

1.PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area

The City of Dixon is situated along the scenic Rock River in northwest Illinois, about 100 miles due west from Chicago. It is hard to mention Dixon without associating the name of the City's most famous son: Ronald Reagan. Today, a number of Reagan sites throughout Dixon are visited by thousands of people each year. This quintessential river city has been a treasure to residents, businesses, and tourists alike since its settlement in the early 1800's. Dixon's historic economic base was comprised of the movement of goods by river and rail, the inception of industrial mills, and construction of various manufacturing facilities located on Dixon's riverfront and throughout the adjacent downtown. Dixon was on a major trade route before and after the Civil War. Dixon soon became the major economic center of Lee County, shaping agriculture, industry, service, retail, and residential growth in the region. With the development of more modern manufacturing and industrial facilities over time, most of the major employers shut down their operations in Dixon, leaving the City's formerly industrial-lined waterfront and downtown vacant and blighted. With the major loss of industry in town, Dixon's working-class population suffered job loss, and neighborhoods outside of the downtown area became disconnected from the heart of the City. Although companies have continued to open and expand over the years, new activity has not been enough to keep pace with the number of factories that have closed their doors and left the area, which has had a negative impact on the local economy. Small, rural communities with economies relying heavily on agricultural and manufacturing activities like Dixon have performed less well than larger urban and metropolitan areas where businesses can access a larger workforce with more up-to-date technical expertise.

The economic downturn described above affected the riverfront/downtown corridor in Dixon the most, which is why Dixon has designated this corridor as the Target Area of their brownfields redevelopment efforts. The riverfront/downtown corridor winds along the riverfront for approximately three miles, and connects the rest of the City to the riverfront/downtown area. Dixon's waterfront, oldest neighborhoods, original downtown, and several long-standing commercial businesses are located within this corridor. Unfortunately, brownfields are also a significant feature of this corridor, illustrated by the presence of vacant and underutilized properties from Dixon's industrial past. When industry left Dixon, the loss of quality jobs within walking distance of neighborhoods not only increased unemployment and poverty in the City, but impacted the connectivity and viability of neighborhood businesses and services that come with a thriving neighborhood economy. With their 2017 Brownfields Assessment Grant funding, the City of Dixon designated five specific priority project sites that they wanted to address in the Target Area. The DIMCO site, the subject of this Cleanup Grant application, was one of the City's priority project sites at that time. The impact of this brownfield site is felt throughout the City, but have been experienced most acutely by the residents of the riverfront/downtown corridor. The demographics of Census Tract 17103000600, the tract that the DIMCO site is located in, speak for themselves: the Median Household Income for this area is \$39,095, which is much lower than that of the City as a whole at \$47,000, Lee County at \$54,000, or the State of Illinois at \$65,886; and the Poverty Rate in this area soars to 23.9%, which is more than double that of the State of Illinois at 11%¹. Now that the DIMCO site has been assessed and partially remediated through agency-led time critical removal action, it is time for remaining cleanup activities to commence so Dixon can continue their downtown riverfront revitalization plans for this area.

1.a.ii. Description of the Proposed Brownfields Site

The Dixon Iron & Metal Company (DIMCO) site, the subject of this Clean-up Grant application, is a former metal scrapyards facility located at 78 Monroe Avenue, which is located directly on the Rock River. The land at this site was once covered in recycling materials and contaminated debris, illustrating the blight and underutilization of this property, particularly due to the site's riverfront location. The former DIMCO site is located on the south side of the Rock River, in a Floodplain, near downtown Dixon, Illinois, and has been vacant since scrap metal recycling operations were discontinued in 2017. The most recent scrapyards operator, Dixon Iron & Metal Company, LLC, was administratively dissolved in 2018. The Property consists of two (2) parcels of land which are transected by a utility corridor/former right-of-way (River Street) and encompass approximately 3.13 acres. Former buildings on the norther parcel have been demolished with slabs left in place. Environmental assessment activities conducted on

¹ Demographic Data for Census Tract 17103000600 found at www.census.gov

behalf of the City of Dixon were initiated with a Phase I Environmental Site Assessment (ESA) in April 2017, which was followed by Phase II investigations between April 2017 and August 2018. The City engaged the assistance of the Illinois Environmental Protection Agency (IEPA) Office of Site Evaluation (OSE) to assess the site during Phase II ESA activities. The Site investigations identified concentrations of total polychlorinated biphenyls (PCBs) and several volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals above the Illinois EPA Tiered Approach to Corrective Action Objectives (TACO) Tier 1 remediation objectives. Furthermore, the investigations revealed the presence of lead at concentrations exceeding the toxicity characteristic threshold for hazardous waste, PCBs in excess of 50 parts per million (ppm), and free product light non-aqueous phase liquid (LNAPL) consisting of diesel fuel and elevated concentrations of PCBs. With consideration for the elevated contaminant concentrations and widespread distribution of PCBs and select metals across the property and the immediate proximity of the Rock River, the City began to seek cleanup assistance from state and federal regulatory agencies. In 2018, the property was referred to the United States Environmental Protection Agency (US EPA) for Time-Critical Removal Action to remediate conditions presenting an immediate threat to human health and the environment. The property was concurrently enrolled into the Illinois EPA Site Remediation Program (SRP) by the City in October 2018 to begin navigating the stringent requirements of the state agency to eventually close the site and obtain a No Further Remediation (NFR) letter. The City of Dixon acquired the property through abandonment proceedings on May 8, 2019. US EPA-led Time-Critical Removal Action was conducted in 2019 and 2020 to address soil and limited groundwater contamination. The time-critical action removed scrapyard debris from the surface in addition to 17,570 tons of nonhazardous metal-contaminated soils and 2,871 tons of TSCA-regulated PCB-contaminated soils. TSCA-approved caps and engineered barriers were installed over excavated areas, followed by clean backfill placement. A groundwater interceptor trench was also installed to mitigate migration of LNAPL to the Rock River. US EPA removal actions continued in summer 2021 to address PCB-impacted sediment in the adjacent Rock River. Overall, the property received a healthy dose of time-critical removal action to address the immediate threats to human health and the environment; however, contamination remains on the property in the form of total petroleum hydrocarbons (TPH), LNAPL, small pockets of untouched contaminated shallow soils. These issues will require further cleanup by the City of Dixon to satisfy the requirements of the Illinois EPA SRP in pursuit of an NFR letter. In addition, the City completed asbestos inspections in March 2020 which identified asbestos-containing building materials (ACBMs) in two (2) of the Property buildings. The proposed Cleanup Activities included in this application will enhance the cleanup efforts completed to date at the DIMCO site, while implementing necessary remediation activities that will end with a site that is ready for redevelopment by the City of Dixon.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

Dixon has identified the riverfront/downtown corridor as the key to Dixon's future success as a community – the focus of economic development, growth, and sense of community. The riverfront/downtown corridor features the space and setting to offer opportunities for park and trail features, world-class outdoor recreation, industrial sector resurrection and associated job growth, and much needed affordable housing opportunities. The pathway to this grand vision is through making Dixon's long-neglected riverfront/downtown neighborhoods more successful. Currently, their success is hindered by the presence of vacant and underutilized industrial properties, outdated infrastructure, lack of housing, and poor connectivity. Brownfields are at the core of each of these barriers. This cleanup grant funding paves the way for Dixon to realize its revitalization goals. Redevelopment of the DIMCO site will contribute to community-wide redevelopment and re-vitalization plans through expansion of the downtown riverfront. The City has received an Illinois Transportation Enhancement Program grant for a recreational path. The recreational path alignment is anticipated to run along the riverfront through the DIMCO site, connecting with the adjacent viaduct/embankment via boardwalk. In addition, Dixon has received a RAISE grant to construct a pedestrian bridge across the Rock River from the adjacent viaduct/embankment. The recreational path and pedestrian bridge will connect citizens living in the southwest and northwest portions of Dixon to the vibrant downtown and riverfront. Brownfield funding is integral for remediation of the DIMCO property, which in turn will lead to successful riverfront redevelopment and a greater community-wide plan. Economic development activities are expected to occur as a result of brownfields funding with anticipated creation of new jobs, addition of potential residential units, increase in property/sales tax base, current downtown business expansion, and attraction of new business to downtown Dixon. The former DIMCO property is also a key component to redevelopment area initiative identified by the City as "Viaduct Point." The Viaduct Point redevelopment area includes thirteen separate parcels and three roads in the riverfront/downtown

corridor. With the City's acquisition of the former DIMCO property, ten of the thirteen key parcels on the Viaduct Point plan have now either been successfully acquired or are under contract to purchase. The Viaduct Point redevelopment area is prime riverfront acreage that connects directly to the existing Heritage Crossing region of downtown Dixon. The project mission includes both land acquisition and then identification and mitigation of any environmental issues to allow for future redevelopment. This project also synergizes with the City's Illinois Transportation Enhancement Program (ITEP) funded trail project, and the Lee County Greenways & Trails Plan. The City of Dixon plans for a recreational path that will run directly through the DIMCO site. Dixon was recently awarded two ITEP Grants totaling \$3.4 million from the Illinois Department of Transportation (IDOT) for the construction of a 1.6 mile recreational path extending in part through the Target Area and DIMCO site. Recreational path construction is scheduled for Summer 2023. Furthermore, the City has relentlessly pursued a RAISE grant for several years for a pedestrian bridge crossing the Rock River immediately adjacent to the DIMCO property, which will provide connection of the new recreational paths to parks and greenspace on the north side of the river. The City received notification of the RAISE grant award in November 2021.

1.b.ii. Outcomes and Benefits of Reuse Strategy

The Dixon community has long expressed a desire for a more publicly accessible riverfront that is complemented by gathering places and recreational opportunities. The Rock River is a unique natural feature that helps define the character of the Dixon Riverfront area. Incorporating additional park and open space can help reinforce the distinctiveness of the area and attract additional visitors. Open and green spaces are needs that makeup significant parts of the mixed-use concept plan that has been developed for the riverfront/downtown properties. The continued planned system of continuous parks, pathways, scenic drives, and fishing sites on both sides of the Rock River could be one of the best examples of an urban greenway in Illinois – or anywhere else in the entire nation. This Brownfields Cleanup Grant funding will be an asset not only to the DIMCO site, but also to the recreational trail project as it will environmentally cleanup the property so it's ready for a productive and environmentally friendly end-use. When completed, the 1.6 mile recreational trail will provide for the much needed and wanted connectivity for the entire City of Dixon. This path will have the capability to connect people to employment opportunities, retail destinations, schools, and existing trail systems in the City. The DIMCO site is also impacted by the recently awarded RAISE grant from the DOT – the RAISE grant will help finance the construction of approximately 2.8 miles of ADA-compliant multi-use path, construct a pedestrian bridge over the Rock River using the abandoned Illinois Central Railroad piers, and resurface approximately 0.8 miles of Page Drive in Page Park. The project is the fourth and final phase of the City of Dixon Riverfront Master Plan. The project will help alleviate safety concerns by providing a new, dedicated pedestrian river crossing. The complete streets elements will improve walkability for high school students traveling to school, provide non-motorized transportation alternatives to employment opportunities and centers and allow for the use of active transportation to access resources and entertainment. The project will allow for increased transportation choice through improved walkability through an economically disadvantaged area and increase accessibility through the ADA improvements. The project will improve the condition of aging and deteriorating facilities by rehabilitating the bridge and resurfacing the pavement.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Characterization

Supplemental capital in many forms will be needed to make a full redevelopment at the DIMCO site economically feasible. Tourism Agencies, both State and Federal, will be a resource for Dixon due to their National Historic Preservation Districts, and many landmarks/museums dedicated to President Ronald Reagan, as Dixon was Reagan's boyhood home. Other funding resources that will be made available for the project include: Dixon TIF funds, Enterprise Zone benefits, Opportunity Zone benefits, New Market Tax Credits, Community Development Block Grant funds ranging from \$550,000 to \$1,000,000, Illinois DNR Recreation grant funding up to \$400,000, and private capital in the millions from the developers involved in the future redevelopment of the riverfront/downtown corridor.

1.c.ii. Resources Needed for Site Remediation

1.c.iii. Resources Needed for Site Reuse

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1.c.iv. Use of Existing Infrastructure

The planned reuse/redevelopment plans for the former DIMCO site will utilize existing water and sewer infrastructure that extend to the property. The redevelopment of the site will primarily utilize new infrastructure – this includes new structures, parking lots/facilities, roads, sidewalks, curb and gutters, internet, and electricity infrastructure. The DIMCO site is large enough that, if divided, new infrastructure may be needed to serve the redevelopment. In this case, the existing infrastructure may need to be extended from the City’s right-of-way. Dixon’s priority is on infrastructure reuse, but will work with developers when new infrastructure is required. New infrastructure may be required for broadband capabilities or any energy efficiency installations like solar power, as they do not currently exist at the site.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

2.a. Community Need

2.a.i. The Community’s Need for Funding

Dixon does not have the financial resources to tackle the remediation work described herein without financial support. Although there are State brownfield grants available, state brownfield funds are not effective enough for Dixon’s cleanup project due to the State program’s funding limitations. Like many municipalities throughout the United States, the City of Dixon has experienced unprecedented fiscal pressure over the past several years. Dixon has faced tremendous challenges to provide funding for basic government services while sales tax revenues, earnings on investments, and other economy driven revenues have remained stagnant or declined. Brownfield sites add to this pressure since they do not generate sales tax for the City. In addition, the City of Dixon was the victim of theft when the City’s long-term comptroller was exposed for stealing over \$53 Million from Dixon over a period of twenty years. The City has safeguards in place now to assure that internal theft will never be an issue for them again, however, they are still financially dealing with the aftermath of those events. Dixon is actively navigating the effects of the economic issues mentioned above and does not have extra funds on-hand to finance brownfield remediation efforts on their own. This cleanup grant will help Dixon jump-start redevelopment on a site that conventional developers would typically ignore. This, in turn, promotes the reuse of abandoned brownfields, while creating an end-use for the site that will provide a better quality of life and create good paying jobs for Dixon residents, while increasing municipal revenues.

The impact of brownfield sites is felt throughout the City, but have been felt most acutely by the residents of the riverfront/downtown Target Area. The demographics of the riverfront/downtown corridor clearly illustrate the need of the area, especially that of Census Tract 17103000600 where the former DIMCO site is located: the Per Capita Income is \$20,779 and the Median Household Income is \$39,095 – both of which are drastically lower than that of the State of Illinois at \$36,038 and \$65,886 respectively - and the Poverty Rate soars to 23.9% in the Target Area². Per the US Department of Housing & Urban Development’s Low and Moderate Income Mapping tool, the former DIMCO site is located in an area where the population is comprised of 59.63% low-to-moderate income persons³. The impact of job loss and other economic factors are felt throughout the City of Dixon, but have been felt more acutely by the residents of the riverfront/downtown corridor Target Area. The loss of quality jobs within walking distance of developed neighborhoods not only increased unemployment and poverty in the Corridor, but impacted the connectivity and viability of neighborhood businesses and services that come with a thriving economy. Brownfields are not the sole cause of impoverishment and unemployment in the City of Dixon, however, their heavy concentration in the Corridor complicates the many avenues available to solving these problems. The acres of identified brownfield land in the City represent a lost opportunity to generate property tax for the City. Without remediation, these sites also represent lost opportunity for the development of new job creation. In turn, the redevelopment of these sites would expand the workforce and lift the housing market needed to support job growth. Existing brownfields in the City, and particularly throughout the riverfront/downtown Corridor contribute to blight and vacancy, and serve as barriers to needed infrastructure improvements. The heavily traveled Interstate-88 and State Route 26 that currently travel through the riverfront/downtown corridor leads to heavy industrial traffic that bisects the adjacent residential neighborhoods and severs any connection between these neighborhoods and the Rock River. These roads also face reconstruction issues need to be addressed, however, the necessary construction efforts of the roads would encounter several former rail and industrial brownfields properties, and the added expense and uncertainty is an additional barrier to project initiation. This grant funding could help keep vital redevelopment projects moving forward, not impede them.

² US Census Data – www.census.gov

³ US HUD Low & Moderate Income Mapping - <https://hud.maps.arcgis.com/apps/webappviewer/index.html?id=ffd0597e8af24f88b501b7e7f326bedd>

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

According to US EPA's EJView, the City of Dixon has over 30 Air Emissions sites (AFS), over 25 Water Dischargers (PCS/ICIS), and dozens of facilities that have Toxic Releases per the Toxic Releases Inventory (TRI). There are also dozens of active air discharge permits in the City. Each of these environmental issues occur heavily in the targeted riverfront/downtown corridor. Dixon's downtown and riverfront are also susceptible to heavy truck traffic, due to the City being the crossroads busy highways including Interstate-88, Illinois Route 26, Illinois Route 38 and Illinois Route 52. Average Daily Traffic Counts for these highways range from 4,950 to 21,000, further illustrating the heavy traffic in the area⁴. Low-income residents, people in poverty, and minorities live in greater percentages in the Target Area than elsewhere in the City. These sensitive populations are thus disproportionately impacted by the number of unaddressed brownfield sites in the riverfront/downtown corridor. Dixon is home to many sensitive populations, including children, senior citizens over the age of 65, minorities, and women of child-bearing age. According to 2020 US Census data, 19% of Dixon's population is children under the age of 18 years old, with 7% of them being ages 0-5. Women of child-bearing age make up 33% of the City's population, and 14.5% of the population are made up of senior citizens over the age of 65. These statistics are even more significant in the Target Area. 22% of the population are under the age of 18 in the riverfront/downtown district, with 8% of those being under the age of 5. The poverty rate in this area ranges from 15% to 25.28%, drastically higher than that of Dixon as a whole, Lee County, the State of Illinois, and the Nation's respective levels. In addition, 10% of the population in the City's priority project area are disabled in some capacity⁵. EPA's EJScreen shows that the downtown/riverfront neighborhood that the DIMCO site is located in has an Air Toxics Cancer Risk in the 54th percentile, a Particulate Matter Levels in the Air in the 52nd percentile, Diesel Particulate Matter in the Air in the 50th percentile, and the presence of Lead Paint in the 93rd percentile⁶. This data helps to make the case that the former DIMCO site, and other potential brownfield sites in the adjacent area, are a direct health and safety threat to the sensitive populations in the area. The types of site contaminants associated with the DIMCO site are known carcinogens, and the suite of other health effects associated with chronic exposure to the listed contaminants include respiratory problems, developmental delay, central nervous system effects, and reproductive system effects. Residents within close proximity to the former DIMCO site and adjacent sites in the riverfront/downtown corridor are potentially exposed to site soil contaminants through dermal contact, ingestion and inhalation of particulates and vapors.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions

According to US EPA's EJView⁷, the City of Dixon has over 30 Air Emissions sites (AFS), over 25 Water Dischargers (PCS/ICIS), and dozens of facilities that have Toxic Releases per the Toxic Releases Inventory (TRI). There are also dozens of active air discharge permits in the City. Each of these environmental issues occur heavily in the targeted riverfront/downtown corridor, affecting these residents more directly. The DIMCO site is an abandoned and blighted property, which directly relates to increased levels of crime and deteriorating conditions of the site itself, as well as the surrounding properties and neighborhoods. In addition to the perceived contamination already existing at the DIMCO site, many other sites in the Target Area are also hot spots for illegal dumping due to their vacancy and blight. The surrounding residential neighborhoods and the Rock River are susceptible to this contamination as well, especially with the project located in a Floodplain. Dixon is a historic city, and per the Census, 33.5% of houses in the City were built before 1939, illustrating the presence of asbestos and lead paint in residences throughout Dixon. The high rate of older housing in the Target Area, combined with low income, high poverty, and long-term disinvestment, all exacerbate the property maintenance issues at the DIMCO site and other sites in the target area. A comprehensive revitalization program is needed to arrest this decline. This cleanup funding is an important part of Dixon's revitalization plans in the Target Area.

(3) Promoting Environmental Justice

Throughout their remediation efforts, the City of Dixon will work to educate stakeholders on the importance of integrating principles of environmental justice and equitable development into the cleanup

⁴ IDOT Traffic Count - <https://www.arcgis.com/apps/webappviewer/index.html?id=3bea9453ab3d41b18eb5691e6084f9e5>

⁵ www.uscensus.gov

⁶ EPA's EJ Screen - <https://ejscreen.epa.gov/mapper/>

⁷ <http://epamap14.epa.gov/ejmap/ejmap>

and redevelopment of the DIMCO site, including: ensuring equitable access to amenities such as health clinics and grocery stores, working with minority- and women-owned businesses, ensuring jobs with living wages, partnering with community-based organizations and neighborhood leaders to enhance the understanding of environmental and health-related issues at the community level, creating commercial linkage strategies, and reusing brownfield sites for greenspace and other healthy, safe and walkable areas like Dixon has planned for the DIMCO site. Dixon will also work to provide accessible and culturally appropriate opportunities for low-income, minority and linguistically isolated stakeholders to meaningfully participate in decision-making processes on the proposed brownfield cleanup. These principles help to ensure that low-income and minority residents in the project area, which has historically consisted of blighted properties and perceived or known environmental contamination, reap the benefits of this environmental cleanup project.

2.b. Community Engagement

2.b.i. Project Involvement and 2.b.ii. Project Roles

The City of Dixon has partnered with numerous grass-root and community organizations that will serve vital and meaningful roles in the Brownfields Program. The City’s Brownfields partners include the Dixon Park District, Dixon Area Chamber of Commerce & Industry, Lee County Industrial Development, Blackhawk Hills Regional Council, Blackhawk Waterways CVB, and Lee County Tourism Council.

Will anyone be providing funding for site redevelopment?

Community Partner	Organization Description	Role
Dixon Park District	The Dixon Park District maintains a high standard of leadership and competency in the promotion of sound environmental practices and lifestyles, and to maintain a creative and efficient park and recreation system.	Recreational Reuse Opportunities Consultant & Partner; BRAC Member
Dixon Area Chamber of Commerce & Industry	The Dixon Area Chamber of Commerce is an organization of business and professional men and women who have joined together for the solution of their mutual business and community problems.	Property Owner Liaison; Planning; Community Engagement; BRAC Member
Lee County Industrial Development Association	An Economic Development organization committed to building a better and stronger regional economy.	Partner on Viaduct Point Redevelopment project; Community Engagement; BRAC Member
Blackhawk Hills Regional Council	As northwest Illinois’ regional planning commission, providing resources throughout the region on issues like community and economic development, land use, and natural resource conservation.	Regional Economic Development Consultant; BRAC Member; Funding Assistance
Blackhawk Waterways CVB	Blackhawk Waterways Convention & Visitors Bureau (CVB) is a non-profit CVB, dedicated to promoting the Illinois counties of Carroll, Lee, Ogle, and Whiteside as a tourism destination.	Recreational Reuse Opportunities Consultant; Tourism Consultant for Redevelopment Opportunities
Lee County Tourism Council	County-wide organization dedicated to promoting the social, recreational, historical, and quality of life facets of Lee County.	Community Engagement and Outreach; BRAC Member

2.b.iii. Incorporating Community Input

The City of Dixon will include the affected neighborhood and their respective residents, property owners, and business owners as vital partners in their cleanup and reuse plans. Neighborhood organizations and citizen’s groups listed above will have the opportunity to express their concerns, identify their needs, and create and implement reuse plans. The City of Dixon will utilize their Project Partner organizations to assist with community notification efforts. As Dixon moves forward with the cleanup, the City will hold two (2) public meetings and develop two (2) fact sheets on the status of Brownfield cleanup activities at important junctures like prior to remediation commencing, during, and when the cleanup work is complete. Public meetings will be held in-person, but will have an option for remote participation due to COVID-19. Dixon will post the fact sheets on their website and utilize any necessary social media to notify the public with links directly to the City webpage. If the City is awarded this

grant, they will continue with the utilization of diverse notification methods (i.e. social media, website, postings) to ensure that they reach a broad audience. It will also be a priority for Dixon to describe their activities, and progress in ways that are easily understood by their residents, who will most likely be unfamiliar with environmental and scientific terminology.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS:

3.a. Proposed Cleanup Plan

The proposed Cleanup Plan is based on the Analysis of Brownfield Cleanup Alternatives (ABCA) prepared for this specific property. The tasks and activities described below are eligible uses of funds and are specifically designed to be effectively completed within the three-year period of performance. The proposed cleanup plan is as follows:

- **In Situ Chemical Oxidation of TPH and LNAPL Recovery:** LNAPL containing diesel fuel mixed with PCBs has been documented on the water table in the northwest corner of the site. The cleanup plan will include conducting in situ chemical oxidation via injections of a liquid reagent to rapidly oxidize total petroleum hydrocarbons (TPH) and induce conditions favorable for long-term biodegradation of residual contamination. Following injection activities, confirmation soil sampling will be completed to verify that the TPH concentrations are below the soil attenuation capacity approved by the Illinois EPA. LNAPL monitoring and recovery will be accomplished using active skimmer pump systems, passive recovery canisters, or absorbent socks, depending on the thickness and recovery time of LNAPL in monitoring and recovery wells.
- **Engineered Barrier Placement over Contaminated Soils:** Install an engineered barrier in the portions of the Site not already covered in geotextile or a TSCA-approved cap during previous US EPA Time-Critical Removal Action. The cleanup plan includes relying on the existing building slabs as engineered barriers and add approved barriers to the appropriate remaining areas on the site. Engineered barriers will consist of woven geotextile fabric overlain by at least two (2) feet of clean backfill and vegetation, consistent with the barriers installed by US EPA. Limited shallow excavation may be required to allow for placement of the barriers and proper Site grading. This component of the Cleanup Plan includes the installation of monitoring wells near the down-gradient Site boundary to complete further evaluation for potential groundwater and/or surface water impacts resulting from the contaminated soils left in place.
- **Asbestos Abatement:** Buildings 3 and 5 will be abated of asbestos containing building materials to prepare the site for future reuse as open public space.

3.b. Description of Tasks/Activities and Outputs

3.b.i. Project Implementation

Task 1: Program Management
i. Project Implementation: This task includes oversight of the City’s Cooperative Agreement with US EPA for this project, ensuring compliance with the Agreement, Work Plan, Schedule, and EPA’s regulations. This task also includes preparation/submittal of Quarterly and Annual Reports, MBE/WBE reporting, entering information in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database for the project, procurement of a Qualified Environmental Professional to lead the project, and City of Dixon staff attendance at a US EPA Brownfields Conference, and final closeout.
ii. Anticipated Schedule: This task will start immediately upon project award, and will be ongoing continuously throughout the entire four-year project period.
iii. Task/Activity Lead: This task will be led by the City Manager and the Public Works Director for the City of Dixon.
iv. Outputs: Executed Cooperative Agreement, Contract with Qualified Environmental Professional, 12 Quarterly Reports, 3 Annual Reports, 3 MBE/WBE Reports, Quarterly Updates to ACRES, attendance of City Staff at a National Brownfields Conference, and final closeout documentation to US EPA

Task 2: Community Involvement
i. Project Implementation: This task includes cooperation between the City staff, Qualified Environmental Professional (QEP), and Project Partners to implement the community involvement plan to inform residents, property owners, and the public about

the status of the project. This task also includes website updates and printed public information materials as needed. Public comments, questions, and concerns will be addressed under this task.
ii. Anticipated Schedule: This task will commence immediately upon project award, and will continue throughout the entire four-year project period.
iii. Task/Activity Lead: This task will be led by Dixon’s City Manager and Public Works Director, with assistance from the selected Qualified Environmental Professional and Project Partners.
iv. Outputs: 3 Public Meetings and Meeting Minutes, 3 Website Updates, 3 Fact Sheets

Task 3: Cleanup Planning
i. Project Implementation: Prior to site remediation work, the Qualified Environmental Professional will prepare a site-specific work plan including the Health & Safety Plan, Quality Assurance Project Plan, finalize the ABCA, finalize the cleanup plan, and develop Cleanup Plans & Specs. The City will secure all necessary permits and prepare bid documents to select a competitive, qualification-based Cleanup Contractor in compliance with federal, state, and local procurement requirements.
ii. Anticipated Schedule: This task will commence after the City selects a Qualified Environmental Professional, approximately 90 days after award, and will continue through the rest of the four-year project period.
iii. Task/Activity Lead: This task will be led by the City and the Qualified Environmental Professional.
iv. Outputs: Health & Safety Plan, Quality Assurance Project Plan, finalize the ABCA Decision Document, Cleanup Plans & Specs, Permits, and selection of Cleanup Contractor to perform remediation activities at the project site, and contract documents for the QEP

Task 4: Cleanup Activities
i. Project Implementation: This task includes the cleanup work, including: LNAPL monitoring and removal; conducting in-situ chemical oxidation via injections to address TPH; post-remediation soil confirmation sampling, remaining engineered barrier installation, post-remediation groundwater monitoring, and asbestos abatement
ii. Anticipated Schedule: This task will commence after the first year in the project period, and will continue until project closeout.
iii. Task/Activity Lead: This task will be led by the Qualified Environmental Professional.
iv. Outputs: Pre-Construction Meeting/Minutes, removal of contamination, lab reports, a final cleanup report, 3.13 acres of land remediated under institutional controls, alternative and engineered barriers.

3.c. Cost Estimates

Budget Categories		Project Tasks				TOTAL
		Task 1: Program Management	Task 2: Community Involvement	Task 3: Cleanup Planning	Task 4: Cleanup Activities	
Direct Costs	Personnel	\$6,000	\$3,000	\$1,200	--	\$10,200
	Travel	\$2,700	--	--	--	\$2,700
	Contractual	\$5,000	\$2,500	\$37,500	\$690,000	\$735,000
	Other	--	--	--	\$20,000	\$20,000
Total Direct Costs		\$13,700	\$5,500	\$38,700	\$710,000	\$767,900
Total Federal Funding		\$13,700	\$5,500	\$38,700	\$710,000	\$767,900
Cost Share		--	--	--	--	--
Total Budget		\$13,700	\$5,500	\$38,700	\$710,000	\$767,900

3.c.i. Development of Cost Estimates
Task 1: This budget includes \$6,000 of City personnel time at ~\$60/hour, this will provide approximately 100 hours of City staff time for all reporting and cooperative agreement management activities. Travel costs include \$2,700 for two (2) City Staff to attend a National Brownfield Conference (Airfare at \$500 each, Lodging at \$175

per day per staff member, Meals and Expenses \$325 per person). Contractual work is intended for the QEP to provide backup documentation and support the City in program management (40 hours at \$125/hour = \$5,000).
Task 2: This budget includes \$3,000 of City personnel time at ~\$60/hour, this will provide approximately 50 hours of City staff time for the development of Fact Sheets, Website updates, and conducting Public Meetings. The \$2,500 for contractual work is for 20 hours of Qualified Environmental Professional assistance in development of fact sheets and public meeting attendance (\$125/hour x 20 hours = \$2,500).
Task 3: The budget includes \$1,200 of City personnel time at \$60/hour, this will provide approximately 20 hours for City staff time for bidding coordination and deliverable review. The \$37,500 Contractual Budget will be for the development of the HASP, QAPP, finalization of the ABCA, Cleanup Plans & Specs and permitting for the project, and assistance with bidding. At \$125/hour, this will provide 300 hours of consultant time for this task.
Task 4: The \$710,000 Contractual Budget is separated into procured services for in situ chemical oxidation and LNAPL recovery (\$340,000), Engineered Barrier installation (\$130,000), and Asbestos Abatement (\$28,000). \$192,000 will be for confirmation sampling, down-gradient groundwater monitoring, oversight of cleanup activities, and final reporting by the QEP. The amount of time for the oversight and reporting will be a function of the schedule provided by procured cleanup contractors. The remaining \$20,000 will be used to pay Illinois EPA Site Remediation Program review fees incurred for interim agency review.

3.d. Measuring Environmental Results

To ensure that the City of Dixon achieves the intended results of the Cleanup Grant and completes the outputs of each task listed above, the City will carefully track, measure, and report project performance through annual reports, quarterly reports, ACRES reporting, and with the implementation of the City’s Community Involvement Plan. Quarterly and Annual Reports will cover project progress, any difficulties encountered, a record of financial expenditures, data results, and anticipated further actions. Specific accomplishments, contaminants found, which materials were impacted, and resources required to leverage and complete the planned reuse will all be reported on. This site will be entered into the ACRES database, which will also be utilized to track job creation and acres of land assessed as part of this grant project. Anticipated quantifiable outcomes from this project include the number of acres of land remediated and the square footage of the installed engineered barrier, while other outcomes include liability protection for the site owner, removal of blight, reduction or elimination of future contaminant exposure, improving community health, and the return of the site to a productive mixed use.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4.a. Programmatic Capability

Dixon has the ability and capacity to manage this grant. If awarded this funding, Dixon will effectively manage the grant and successfully perform each phase of work on the project. City Manager Danny Langloss and Public Works Director Matt Heckman will serve as the City’s Project Managers for this project, serving as the City’s primary contacts and responsible for submitting quarterly reports, financial reports, progress reports, and the final summary report to EPA Region 5 Staff with the assistance of the City’s Qualified Environmental Professional. The City has extensive experience facilitating and managing redevelopment projects and will utilize that experience to support the most strategic use of the grant funds. Upon award of the cooperative agreement, City staff will prepare a draft Work Plan. After the US EPA approves the work plan, the City will retain the Qualified Environmental Professional (QEP) in compliance with all applicable federal and local procurement requirements. The QEP will assist with grant and program management and will conduct cleanup planning, cleanup activities and participate in project reporting and community engagement activities. The City will work with IEPA to provide independent oversight of cleanup activities conducted under this program, to ensure all assessment is conducted appropriately and with consideration for public health and welfare.

4.a.i. Organizational Structure

The City will procure a brownfields consultant that has a proven track record with programmatic reporting with EPA Brownfields grants. The City will adhere to their work plan, schedule, and all terms and conditions required by US EPA. The selected Qualified Environmental Professional will work closely with IEPA and the assigned US EPA Grant Manager to oversee and approve remediation activities. Dixon will follow all federal procurement procedures when hiring a brownfields consultant and remediation contractor. Specifically, this project will be led by Dixon’s City Manager and Public Works Director/Assistant City Manager, with assistance from the Mayor and Director of Finance.

4.a.ii. Description of Key Staff

The City of Dixon will identify, coordinate and leverage any public and private resources needed to complete the described grant tasks. The City will follow EPA’s procurement policies to hire a Qualified

Environmental Professional (QEP) to effectively and efficiently assist the City in managing the Cleanup grant project. The QEP will assist the City in preparing bid documents needed to select a contractor to conduct the cleanup work, and manage the remediation project as it commences. All procurement will follow the City's processes along with all additional requirements needed for procurement under an EPA Cooperative Agreement. This project will be led by City Staff including Danny Langloss and Matt Heckman. Mr. Danny Langloss, City Manager, is now serving in his 25th year with Dixon and is very committed to the City's Brownfields program. As the City Manager, he oversees a staff charged with administering the planning, sustainability, neighborhood program, neighborhood and building inspection functions of the City, and with managing economic and urban development efforts. As the City Manager, he is part of an executive team that manages the day-to-day operations for a municipal government representing more than 15,000 residents with an annual General Fund budget of approximately \$10 million. Mr. Matt Heckman, Public Works Director and Assistant City Manager, is now serving in his 30th year with Dixon and is also very committed to the City's Brownfield program. Other key staff will include Mayor Liandro Arellano, Jr. and Director of Finance Becky Fredericks. The Mayor will assist the City Manager and Public Works Director with Community Involvement and Reuse efforts. The Director of Finance will be responsible for receiving, tracking, and payment on all financial aspects of the grant project.

4.a.iii. Acquiring Additional Resources

This cleanup grant will be a catalyst for brownfields redevelopment projects along the riverfront and in the Target Area. The City realizes that this funding alone is rarely sufficient to ensure a successful redevelopment project, which is why Dixon will leverage the resources indicated below to maximize the benefits of this grant directly in the project area:

- **City of Dixon and Illinois Transportation Enhancement Project (ITEP) Grant Funding:**
The City of Dixon was recently awarded two ITEP Grants from the Illinois Department of Transportation (IDOT) for the construction of a 1.6 mile recreational path located directly throughout the Target Area. IDOT will be providing approximately \$3.4 million in grant funding for this project, while the City of Dixon will be putting forth at least \$400,000 for the project. This funding will provide for the much needed and wanted connectivity for the entire City. This path will have the capability to connect people to employment opportunities, retail destinations, schools, and existing trail systems in the City.
- **DOT RAISE Grant (Rebuilding America's Infrastructure with Sustainability and Equity):**
The City of Dixon was recently awarded \$11,911,769 in RAISE grant funds from DOT for a project will construct approximately 2.8 miles of ADA-compliant multi-use path, construct a pedestrian bridge over the Rock River using the abandoned Illinois Central Railroad piers, and resurface approximately 0.8 miles of Page Drive in Page Park. The project is the fourth and final phase of the City of Dixon Riverfront Master Plan. The project will help alleviate safety concerns by providing a new, dedicated pedestrian river crossing. The complete streets elements will improve walkability for high school students traveling to school, provide non-motorized transportation alternatives to employment opportunities and centers and allow for the use of active transportation to access resources and entertainment. The project will allow for increased transportation choice through improved walkability through an economically disadvantaged area and increase accessibility through the ADA improvements. The project will improve the condition of aging and deteriorating facilities by rehabilitating the bridge and resurfacing the pavement.

4.b. Past Performance and Accomplishments

4.b.i. Previously Received an EPA Brownfields Grant

The City of Dixon was awarded US EPA Brownfields Assessment Grant funding in 2017, BF 00E02297-0. The major accomplishments completed with these grant funds includes the following:

(1) Accomplishments

The City of Dixon prepared an approved Quality Assurance Project Plan (QAPP) and Health and Safety Plan (HASP) for assessment activity. In total, seven (7) Phase I ESAs, six (6) Phase II ESAs, and three (3) cleanup planning documents have been developed through the City's previous Brownfields Assessment Grant. The DIMCO site utilized prior grant funds, and the City has moved this project through to remediation and redevelopment.

(2) Compliance with Requirements

CITY OF DIXON, ILLINOIS
FY23 Brownfields Cleanup Grant Proposal

The City of Dixon has maintained compliance with their Cooperative Agreement, Work Plan, project schedule, and has abided by all terms and conditions of previous US EPA grant funds. The City of Dixon met all reporting requirements in a timely and efficient manner. Dixon has been compliant with all special grant conditions and closed out the project in a successful manner.

DRAFT