1. **Applicant Identification:**
   City of Dixon
   City Hall
   121 West Second Street
   Dixon, Illinois 61021

2. **Funding Requested:**
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested:
      i. $435,000 in Federal Funds Requested
      ii. Dixon is not requesting a Waiver of the 20% Cost Share Requirement
      iii. Dixon is not requesting a Waiver of the $500,000 limit

3. **Location:**
   a. City: Dixon
   b. County: Lee County
   c. State: Illinois

4. **Property Information:**
   Property Name: Former Dixon Iron & Metals Company (DIMCO) Site
   Property Address: 78 Monroe Avenue
   Dixon, Illinois 61021

5. **Contacts:**
   a. **Project Director:** Mr. Matt Heckman, Public Works Director/Assistant City Manager
      121 West Second Street, Dixon, IL 61021
      Phone: 815.288.1485
      Email: matt.heckman@discoverdixon.org
   
   b. **Chief Executive:** Mr. Liandro Arellano, Jr., Mayor
      121 West Second Street, Dixon, IL 61021
      Phone: 815.288.1485
      Email: liandro.arellano@discoverdixon.org

6. **Population:** 15,274 (US Census, 2020)
7. **Other Factors Checklist:**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less</td>
<td>N/A</td>
</tr>
<tr>
<td>The applicant is, or will assist a federally recognized Indian tribe or United States territory</td>
<td>N/A</td>
</tr>
<tr>
<td>The priority brownfield site(s) is impacted by mine-scarred land</td>
<td>N/A</td>
</tr>
<tr>
<td>Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.</td>
<td>3, 10</td>
</tr>
<tr>
<td>The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or world be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
<td>1, 2, 3, 5, 4, 10</td>
</tr>
<tr>
<td>The priority site(s) is in a federally designated flood plain</td>
<td>1, 5</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy</td>
<td>N/A</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures</td>
<td>N/A</td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing</td>
<td>N/A</td>
</tr>
</tbody>
</table>

8. **Letter from the State Environmental Authority:**

   Please find attached the Letter of Acknowledgement from the Illinois Environmental Protection Agency regarding Dixon’s Cleanup Grant Application.

9. **Releasing Copies of Applications:**

   Not Applicable. This application does not have confidential, privileged, or sensitive information included that cannot be shared.
November 22, 2021

City of Dixon
Attn: Mr. Matt Heckman, Public Works Director/Assistant City Manager
121 West 2nd Street
Dixon, IL 61021

Dear Mr. Heckman,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Cleanup Grant application to U.S. EPA. The City of Dixon is applying for a $435,000 Brownfields Cleanup Grant for hazardous substances.

The focus of the grant will be to conduct cleanup activities at the former Dixon Iron and Metals Company (DIMCO) site. DIMCO is a former metal recycling facility located directly on the Rock River.

Illinois EPA acknowledges the City of Dixon’s efforts to obtain federal Brownfields funds for this project. If you have any questions, I may be contacted at the above address or telephone number, or at Jenessa.N.Conner@illinois.gov.

Sincerely,

Jenessa Conner

Jenessa Conner, Project Manager
Voluntary Site Remediation Unit
Remedial Project Management Section
Division of Remediation Management
Bureau of Land
1.PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:

1.a. Target Area and Brownfields
1.a.i. Background 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 neighbourhoods, 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%. 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 scrapyard 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 scrapyard 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

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1 Demographic Data for Census Tract 17103000600 found at www.census.gov
On 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 (ACBM) 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 and growth. 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 proposed cleanup grant project will also allow Dixon to move forward with their development strategies, focusing more on quality of life aspects to retain existing residents and businesses, as well as attract new residents, visitors, and businesses to call Dixon home.

1.c. Strategy for Leveraging Resources
1.c.i. Resources Needed for Site Reuse
The City of Dixon will be providing $86,000 in funding towards the proposed project. These funds come from the City’s Capital fund. 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. 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 Area.2 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 persons.”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 Route26 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.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 area.4 Low-income residents, people in poverty, and minorities live in greater percentages in the

2 US Census Data – www.census.gov
4 IDOT Traffic Count - https://www.arcgis.com/apps/webappviewer/index.html?id=3bec9453ab3d41b18eb5691e60849e5
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 capacity.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions
According to US EPA’s EJView6, 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
By utilizing US EPA’s online EJScreen program, potential Environmental Justice areas are easily identifiable in Dixon. For instance, 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 percentile7. 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. Dixon will seek to promote environmental justice with this grant funding by: collaborating with community partners to address environmental and health-related challenges featured above; work with our community partners and neighborhood leaders to enhance the understanding of environmental and health-related issues at the community level; and by providing 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.

2.b. Community Engagement
2.b.i. Project Involvement
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

5 www.uscensus.gov
6 http://epamap14.epa.gov/ejmap/ejmap
7 EPA’s EJ Screen - https://ejscreen.epa.gov/mapper/
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.

### 2.b.ii. Project Roles

<table>
<thead>
<tr>
<th>Community Partner</th>
<th>Organization Description</th>
<th>Role</th>
</tr>
</thead>
<tbody>
<tr>
<td>Dixon Park District</td>
<td>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.</td>
<td>Recreational Reuse Opportunities Consultant &amp; Partner; BRAC Member</td>
</tr>
<tr>
<td>Dixon Area Chamber of Commerce &amp; Industry</td>
<td>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.</td>
<td>Property Owner Liaison; Planning; Community Engagement; BRAC Member</td>
</tr>
<tr>
<td>Lee County Industrial Development Association</td>
<td>An Economic Development organization committed to building a better and stronger regional economy.</td>
<td>Partner on Viaduct Point Redevelopment project; Community Engagement; BRAC Member</td>
</tr>
<tr>
<td>Blackhawk Hills Regional Council</td>
<td>As northwest Illinois’ regional planning commission, providing resources throughout the region on issues like community and economic development, land use, and natural resource conservation.</td>
<td>Regional Economic Development Consultant; BRAC Member; Funding Assistance</td>
</tr>
<tr>
<td>Blackhawk Waterways CVB</td>
<td>Blackhawk Waterways Convention &amp; Visitors Bureau (CVB) is a non-profit CVB, dedicated to promoting the Illinois counties of Carroll, Lee, Ogle, and Whiteside as a tourism destination.</td>
<td>Recreational Reuse Opportunities Consultant; Tourism Consultant for Redevelopment Opportunities</td>
</tr>
<tr>
<td>Lee County Tourism Council</td>
<td>County-wide organization dedicated to promoting the social, recreational, historical, and quality of life facets of Lee County.</td>
<td>Community Engagement and Outreach; BRAC Member</td>
</tr>
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</table>

### 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

<table>
<thead>
<tr>
<th>Task 1: Program Management</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. <strong>Project Implementation:</strong> 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, management of the City’s required 20% matching funds for the project, and City of Dixon staff attendance at a US EPA Brownfields Conference, and final closeout.</td>
</tr>
<tr>
<td>ii. <strong>Anticipated Schedule:</strong> This task will start immediately upon project award, and will be ongoing continuously throughout the entire three-year project period.</td>
</tr>
<tr>
<td>iii. <strong>Task/Activity Lead:</strong> This task will be led by the City Manager and the Public Works Director for the City of Dixon.</td>
</tr>
<tr>
<td>iv. <strong>Outputs:</strong> 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</td>
</tr>
</tbody>
</table>

**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 three-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.

<table>
<thead>
<tr>
<th>ii. Anticipated Schedule</th>
<th>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 three-year project period.</th>
</tr>
</thead>
<tbody>
<tr>
<td>iii. Task/Activity Lead</td>
<td>This task will be led by the City and the Qualified Environmental Professional.</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>Health &amp; Safety Plan, Quality Assurance Project Plan, finalize the ABCA Decision Document, Cleanup Plans &amp; Specs, Permits, and selection of Cleanup Contractor to perform remediation activities at the project site, and contract documents for the QEP</td>
</tr>
</tbody>
</table>

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

<table>
<thead>
<tr>
<th>ii. Anticipated Schedule</th>
<th>This task will commence after the first year in the project period, and will continue until project closeout.</th>
</tr>
</thead>
<tbody>
<tr>
<td>iii. Task/Activity Lead</td>
<td>This task will be led by the Qualified Environmental Professional.</td>
</tr>
<tr>
<td>iv. Outputs</td>
<td>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.</td>
</tr>
</tbody>
</table>

3. c. Cost Estimates

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1: Program Management</th>
<th>Task 2: Community Involvement</th>
<th>Task 3: Cleanup Planning</th>
<th>Task 4: Cleanup Activities</th>
<th>TOTAL</th>
</tr>
</thead>
<tbody>
<tr>
<td>Personnel</td>
<td>$6,000</td>
<td>$3,000</td>
<td>$1,200</td>
<td>--</td>
<td>$10,200</td>
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<tr>
<td>Travel</td>
<td>$3,000</td>
<td>--</td>
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<tr>
<td>Contractual</td>
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<td>$2,750</td>
<td>$45,000</td>
<td>$453,050</td>
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<td>$7,000</td>
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<tr>
<td>Total Direct Costs</td>
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<td>$46,200</td>
<td>$460,050</td>
<td>$521,000</td>
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<tr>
<td>Total Federal Funding</td>
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<td>Cost Share</td>
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<tr>
<td>Total Budget</td>
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<td>$5,750</td>
<td>$46,200</td>
<td>$460,050</td>
<td>$521,000</td>
</tr>
</tbody>
</table>

3. c.i. Development of Cost Estimates

Task 1: This budget includes $6,000 of City personnel time, and at ~$60/hour, this will provide approximately 100 hours of City staff time for all reporting and cooperative agreement management activities. The remaining $3,000 is for City Staff to attend a National Brownfield Conference. The cost share of $6,000 would be in-kind city staff time and/or cash towards management of the Cooperative Agreement.

Task 2: This budget includes $3,000 of City personnel time, and 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 $3,000 cost share under this task will go towards community outreach supplies for printing, meetings, fact sheets, and website updates. The $2,750 for contractual work is for 22 hours of Qualified Environmental Professional assistance in development of fact sheets and public meeting attendance ($125/hour x 22 hours = $2,750).

Task 3: The budget includes $1,200 of City personnel time, and at $60/hour, this will provide approximately 20 hours of City staff time for bidding coordination and deliverable review. The $45,000 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 360 hours of consultant time for this task. The City’s $9,240 cost share for this task will be a combination of City funds and City staff time for time spent selecting the qualified environmental contractor to complete the remediation work.

Task 4: The $453,050 Contractual Budget will be for the oversight of the cleanup by the QEP and the actual cleanup work completed by the procured cleanup contractor(s). The amount of time for the oversight will be a function of the schedule the selected cleanup contractor provides. $7,000 will be used to pay Illinois EPA Site.
3.c.ii. Application of Cost Estimates
The cost estimates and breakdowns provided above were developed by the City, along with a QEP. These figures are reasonable and realistic, positioning the City to effectively and efficiently accomplish the goals of their cleanup grant project.

3.c.iii. Eligibility of the Cost Share
The City of Dixon will be providing $86,000 towards the project as a cost share. The City will be providing their cost share in the form of a monetary contribution which will be used for eligible and allowable expenses under the grant.

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**
   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.
THRESHOLD CRITERIA:

1. Applicant Eligibility:
The City of Dixon, Illinois is an incorporated municipality of the State of Illinois and has the authority to enter into a cooperative agreement for a Cleanup Grant with the United States Environmental Protection Agency.

2. Previously Awarded Cleanup Grants:
The proposed cleanup site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds:
Not Applicable. The City of Dixon has not been a recipient of a Multipurpose Grant.

4. Site Ownership:
The City of Dixon is the sole owner of the proposed cleanup grant site.

5. Basic Site Information:
   (a) Site name: Dixon Iron & Metal Company (DIMCO) Site
   (b) Address: 78 Monroe Avenue, Dixon, Illinois 61021
   (c) Current Owner: City of Dixon, Illinois

6. Status & History of Contamination at the Site:
   (a) Contamination: Polychlorinated biphenyls (PCBs), several volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), and metals (primarily antimony, arsenic, lead, and mercury) have been identified in soil above the Illinois EPA Tiered Approach to Corrective Action Objectives (TACO) Tier 1 remediation objectives. Environmental investigations have also revealed the presence of lead at concentrations exceeding the toxicity characteristic threshold for hazardous waste, PCBs in excess of 50 parts per million (ppm), free product light non-aqueous phase liquid (LNAPL) consisting of diesel fuel and PCBs, and Total Petroleum Hydrocarbons (TPH). Asbestos containing building materials also exist in remaining buildings on the Site.
   (b) Operational History & Current Use of Site: The Site was first developed for industrial purposes in the late 1890s, with historical uses including carpentry, lumber, coal, gravel, warehousing, and junkyard. The Site was operated as a junkyard/scrap metal recycling facility from approximately 1910 to 2017 and was most recently identified operated by DIMCO. There have been no active operations on the Site since DIMCO scrapyard operations were discontinued in 2017.
   (c) Environmental Concerns: Threshold exceedances of LNAPL and TPH contamination in soil and groundwater immediately adjacent to the Rock River. Human exposure through inhalation and ingestion pathways to remaining/uncontrolled PCB and metal contamination in soils on the Site. Exposure to asbestos-containing building materials in structures.
(d) **Source of Contamination and Nature and Extent of Contamination:**
Based on assessment work, results of time critical removal actions, and the historic operations at the Site, we know that vehicles, electrical transformers, and other miscellaneous equipment had been salvaged at the Site historically. Remnants of salvage debris was found distributed across the site with bermed materials located along the Rock River and east Site boundary. In addition, a diesel underground storage tank was historically present on the Site. PCBs, metals, VOCs, and SVOCs have been found in soil; PCBs and manganese in groundwater; and PCBs in sediments of the Rock River. US EPA-led Time Critical Removal Action in 2019 and 2020 removed scrapyard debris and highly contaminated soils from the Site. Residual contaminated soils and groundwater remain on the Site. Highly PCB-contaminated river sediment was also removed through US EPA Time Critical Removal Action in 2021. Asbestos has been identified in transite asbestos cement panels on Building 3 and in roofing materials on Building 5. Asbestos materials will require abatement prior to adaptive reuse of the building.

7. **Brownfields Site Definition:** The former Dixon Iron & Metals Company site meets the definition of a brownfield. This site is (a) Not listed or proposed for listing on the National Priorities List; (b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; (c) Not subject to the jurisdiction, custody, or control of the U.S. Government.

8. **Environmental Assessment Required for Cleanup Grant Applications:**
A written ASTM E1903-19 or equivalent Phase II Environmental Site Assessment Report (a draft is sufficient) must be completed prior to application submission. Describe the type of environmental assessments conducted at your proposed site and provide the date of the Phase II (or draft report) or equivalent report.

Multiple Phase II Environmental Site Assessments have been completed on the DIMCO Site by the City of Dixon. The first Phase II ESA was completed August 17, 2017 to verify the presence of and preliminary magnitude of contamination as a result of April 2017 Phase I ESA findings that documented scrapyard operations. A subsequent Focused Phase II Environmental Site Assessment was completed in August 2018 to further evaluate the distribution of contaminants across the Site. The Phase II investigations identified concentrations of several VOCs, SVOCs, metals, and PCBs exceeding TACO Tier 1 remediation objectives. The greatest distribution and highest-level impacts were identified for PCBs and select metals, primarily antimony, arsenic, lead, and mercury. Chemical concentrations identified at the Site exceed the soil ingestion and inhalation exposure route for residential and construction worker receptors, the indoor inhalation exposure route for residential receptors, and the soil and groundwater components to the groundwater ingestion exposure route. In addition, select soil samples contained TCLP lead exceeding the
toxicity characteristic threshold and PCBs exceeding 50 ppm, and free phase LNAPL was observed in one (1) monitoring well location. All Phase II ESA findings have been included and summarized in the Comprehensive Site Investigation Report (October 24, 2018). The CSIR (October 24, 2018) was prepared and submitted for enrollment into the Illinois EPA Site Remediation Program (SRP). Supplemental Site Investigation activities were completed in April 2020 to address Illinois EPA review comments of the CSIR. Subsequent CSIR Addendum No. 1 was submitted to the Illinois EPA on October 28, 2021. The CSIR Addendum included results and remaining contamination concentrations following US EPA Time Critical Removal Actions.

9. Enforcement or Other Actions: Dixon Iron & Metal closed down their operations in 2017 and administratively dissolved in 2018. The City of Dixon involuntarily took ownership of the Site on May 8, 2019 through abandonment proceeding. US EPA-led Time Critical Removal Action took place in 2019 and 2020 to remove scrapyard debris and soils harboring contaminants posing an immediate threat to human health and the environment from the Site. A groundwater interceptor trench was also installed to capture LNAPL diesel fuel with PCBs. US EPA Time Critical Removal Action continued in 2021 to remove contaminated river sediments from the immediately adjacent Rock River.

10. Sites Requiring a Property-Specific Determination:
The DIMCO Site does require a property-specific determination based on review of Section 1.5 in the Information on Sites Eligible for Brownfields Funding under CERCLA 104(k) of the FY22 Guidelines for Brownfield Cleanup Grants. The property-specific determination is attached to the Threshold Criteria.

11. Threshold Criteria Related to CERCLA/Petroleum Liability:
a.) Property Ownership Eligibility – Hazardous Substances Sites
(1) Exemptions to CERCLA Liability - Property Acquired Under Certain Circumstances by Units of State and Local Government - CERCLA §101(20)(D) Liability: The City of Dixon acquired the DIMCO property through abandonment proceedings on May 8, 2019. The petition to declare the DIMCO property abandoned was filed in the Fifteenth Judicial Circuit Court in Lee County, Illinois on May 8, 2019. The defendants include Dixon Iron & Metal Company, LLC, a dissolved limited liability company, James A. Pitchford, William A. Pitchford, The First National Bank in Amboy, United States Department of the Treasury – Internal Revenue Service, Illinois Department of Employment Security, State of Illinois – Department of Revenue, Lawrence Bruckner, and Commonwealth Edison Company. Dixon Iron & Metal closed operations in 2017 and administratively dissolved in 2018. None of the defendants appeared or defended the petition. The court entered an order finding that the property was abandoned and on May 8, 2019, entered an order authorizing the court to sign a judicial deed vesting title in the property to the City of Dixon, excepting therefrom the interests of Commonwealth Edison Company for utility easements.

Information on Liability and Defenses/Protections:
a. **Information on the Property Acquisition:** The City of Dixon acquired the DIMCO property through abandonment proceedings on May 8, 2019. The petition to declare the DIMCO property abandoned was filed in the Fifteenth Judicial Circuit Court in Lee County, Illinois on May 8, 2019. The defendants include Dixon Iron & Metal Company, LLC, a dissolved limited liability company, James A. Pitchford, William A. Pitchford, The First National Bank in Amboy, United States Department of the Treasury – Internal Revenue Service, Illinois Department of Employment Security, State of Illinois – Department of Revenue, Lawrence Bruckner, and Commonwealth Edison Company. Dixon Iron & Metal closed operations in 2017 and administratively dissolved in 2018. None of the defendants appeared or defended the petition. The court entered an order finding that the property was abandoned and on May 8, 2019, entered an order authorizing the court to sign a judicial deed vesting title in the property to the City of Dixon, excepting therefrom the interests of Commonwealth Edison Company for utility easements. The judicial deed was recorded with Lee County on May 13, 2019.

b. **Date on which the property was acquired:** The City of Dixon took ownership of the property via abandonment proceedings on May 8, 2019.

c. **Contribution Toward Hazardous Substances Disposal:** All hazardous waste and otherwise was generated prior to the City acquiring the property. The City has not caused or contributed any release of hazardous substance at the site. The City has not arranged for any hazardous disposal or transported hazardous substances to the site.

d. **Affirm that you have not caused or contributed to any release of hazardous substances at the site:** All hazardous waste and otherwise was generated prior to the City acquiring the property. The City has not caused or contributed any release of hazardous substance at the site. The City has not arranged for any hazardous disposal or transported hazardous substances to the site.

e. **Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site:** All hazardous waste and otherwise was generated prior to the City acquiring the property. The City has not caused or contributed any release of hazardous substance at the site. The City has not arranged for any hazardous disposal or transported hazardous substances to the site.

12. **Cleanup Authority and Oversight Structure:**

a. **Describe how you will oversee the site:**

The City of Dixon enrolled the DIMCO site into the Illinois EPA voluntary Site Remediation Program (SRP) on November 5, 2018 with the intention of obtaining a No Further Remediation (NFR) letter relating to the identified subsurface impacts. Accordingly, the numerical cleanup objectives for subsurface contamination are the TACO remediation objectives for residential, industrial/commercial, and construction worker receptors. TACO regulations stipulate certain threshold criteria must be met the concentration of any PCBs in soil shall not exceed 50 parts per
million without approved control. Therefore, PCBs remaining in soil on site will be addressed through installation of engineered barriers. In addition, TACO regulations stipulate that contaminant source materials (free product) in soil and groundwater may not remain on site in concentrations above the soil attenuation default values. As such, total petroleum hydrocarbons (TPH) and diesel fuel LNAPL will be removed as a primary cleanup objective. In addition, soils remaining on site cannot contain metals (primarily lead) exceeding the toxicity characteristic threshold. Therefore, soils exhibiting the characteristic of toxicity based on TCLP analysis must be remediated as a primary cleanup objective.

b. Provide your plan to acquire access to relevant adjacent or neighboring properties if necessary: This is not needed or applicable for this site, as the site would be stand-alone. The City of Dixon controls all current site access.

13. Community Notification:
   a. Draft Analysis of Brownfield Cleanup Alternatives
      A Draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the project site. The City made it available to the public for review and comment on November 8, 2021. The ABCA and DRAFT Cleanup Grant Application were available for review at City Hall and on the City’s website: https://www.dixongov.com/news/city-of-dixon-brownfield-clean-up-narrative-draft.html. The DRAFT ABCA is included in this grant submittal.

   b. Community Notification Ad
      The City of Dixon published a community notification ad in the local newspaper, the Dixon Telegraph, on October 28, 2021. This ad indicated the following:
      - that a copy of the City’s grant application, including the Draft ABCA, is available for public review and comment;
      - how to comment on the draft application;
      - where the draft application is located (with City Clerk and on the City’s website); and
      - the date and time of a public meeting (November 15, 2021, 5:30 p.m.)

      The Certificate of Publication from the local newspaper for the community notification ad is included in this grant submittal. In addition, we have included a screenshot of the City’s website to illustrate the availability of the draft ABCA and application on the City’s website.

   c. Public Meeting
      The City of Dixon held a Public Meeting on November 15, 2021 at 5:30 p.m. to discuss the draft application and consider public comments on the application and project. From the Public Meeting, the City is including the following in their grant application submittal:
      - the comments or a summary of the public comments received;
      - the applicant’s response to those comments;
• meeting notes or a summary of the public meeting; and
• meeting sign-in sheet

d. Submission of Community Notification Documents
The City of Dixon has included the items listed below in their Cleanup Grant application submittal to US EPA:
• a copy of the draft ABCA
• a copy of the ad that demonstrates notification to the public and solicitation for comments on the application
• the comments or a summary of comments received
• the applicant’s response to those public comments
• meeting notes or summary from the public meeting
• meeting sign-in sheets

14. Statutory Cost Share
The City of Dixon will be providing a 20% cost share for the proposed project in the amount of $86,000. The City will be providing their cost share in the form of a monetary contribution.

15. Waiver of the $500,000 Limit:
Not Applicable.

16. Named Contractors and Subrecipients:
Not Applicable.
PROPERTY SPECIFIC DETERMINATION:

A Property-Specific Determination is requested for the Former Dixon Iron & Metal Property to receive brownfields funding for cleanup activities, which will aid in the protection of human health and the environment and promote the expansion of downtown riverfront development.

The Property falls under the following funding exclusion:
“Properties where there has been a release of PCBs and all or part of the property is subject to TSCA remediation.”

As such, the Property-Specific Determination is required due to the known PCB contamination in soil and groundwater which is, in part, subject to TSCA remediation. Although excluded from the definition of a brownfields site by the stated condition, the Property meets the criteria set forth in the statute and the goals of the brownfield program, as demonstrated below:

1. Basic Site Information:
   a) Site Name: Former Dixon Iron & Metal
   b) Site Address: 78 Monroe Avenue, Dixon, Lee County, Illinois 61021. The Property is a former scrapyard consisting of two (2) parcels and totaling 3.13 acres. The parcel IDs are 07-08-05-131-015 and 07-08-05-127-005.
   c) Ownership: The City of Dixon acquired the Property through abandonment proceedings on May 8, 2019.

2. Circumstance Requiring Property-Specific Determination:
   a) Circumstance of Exclusion: The DIMCO Property is a site where there has been a release of PCBs and all or part of the Property is subject to TSCA remediation.
   b) Environmental Conditions Related to Circumstance of Exclusion: The Property has been impacted as a result of historical scrapyard operations, including the historical operation of hydraulic balers and cranes, storage of various hazardous substances and petroleum products, and PCB-containing scrap components. Phase II environmental assessments identified concentrations of several VOCs, SVOCs, metals, and PCBs exceeding Illinois Administrative Code Part 742 TACO Tier 1 remediation objectives. The greatest distribution and highest-level impacts were identified for PCBs and select metals exceeding remediation objectives for soil ingestion and inhalation exposure, construction worker receptor, indoor inhalation exposure, and the soil and groundwater components to the groundwater ingestion exposure. Select soil samples contained PCBs exceeding 50 ppm. In addition, free phase diesel fuel LNAPL mixed with PCBs at 370 ppm was observed in a monitoring well located in the northwest corner of the site. The City of Dixon received assistance from US EPA-led Time Critical Removal between 2019 and 2021. Time Critical Removal actions primarily addressed soils and debris with PCB contamination over 50 ppm. A groundwater interceptor trench was also installed to mitigate free phase LNAPL migration to the immediately adjacent Rock River. While the Time Critical Removal actions helped clear the site of debris and immediate threats to human health and the environment, the free phase diesel fuel LNAPL with PCBs at 370 ppm remains on the groundwater table on the northwest portion of the Property. In addition, several small areas of soil remain where PCBs <50 ppm have not been
addressed. Considering remaining PCB concentrations in soil and free phase LNAPL, it is anticipated that the site will be subject to TSCA regulation and remediation.

3. Criteria Meeting Eligibility for Funding:
   a) Protection of Human Health and the Environment: Prior environmental assessment at the Property identified PCB contamination in soil, groundwater, and free phase diesel fuel LNAPL. US EPA-led Time Critical Removal actions in 2019-2021 were completed to primarily address contaminated media posing an immediate threat to human health and the environment. Under current conditions following time critical removal actions, there remains the potential for residential, industrial, and construction worker receptors to be exposed to site contaminants through ingestion or inhalation. This risk is amplified by the near-surface depths of the remaining uncontrolled soil impacts. In addition, there is material threat for human and aquatic exposure through migration of groundwater and free phase diesel fuel LNAPL impacts to the immediately adjacent Rock River. Proposed activities to be funded under a brownfield cleanup grant would mitigate human health risks associated with exposure to the PCB contaminated soils through installation of engineered barriers. A brownfield cleanup grant would also be used to remove the free phase diesel fuel LNAPL containing PCBs at 370 ppm, thereby mitigating further contaminant migration to the Rock River. The Property is currently enrolled in the Illinois EPA Site Remediation Program to pursue regulatory closure which will ensure long-term protection of human health and the environment with consideration to remaining PCB contamination and other contaminants previously identified during environmental assessments. The remedial action plan will rely on barriers and TSCA-approved caps previously installed during time critical removal, in addition to barriers and controls implemented through the brownfield cleanup grant. Prior to any regulatory closure, the Illinois EPA will require TSCA division approval of barriers installed to control PCB-contaminated soils. Remedial planning will take into account the intended redevelopment/reuse of the Property for downtown riverfront improvements, including a recreational path and potential mixed-use commercial and residential development to the south.

b) Promote Economic Development: Redevelopment of the Property 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 redevelopement 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.
c) Creation of, Preservation of, or Addition to Parks, Greenways, Undeveloped Property, other Recreational Property, or Other Property Used for Nonprofit Purposes:
Redevelopment of the northern portion of the Property will include an extension of a recreation/bike path along the Rock River, west of Peoria Avenue. The southern parcel of the Property is anticipated to be greenspace for general public use. The rejuvenation of the Property from scrapyard to recreational/park land will enhance the Riverfront and allow citizens of Dixon to access the vibrant downtown and use the space for outdoor gatherings, exercise, and recreation. Recreational paths extending south along the viaduct and north on the future pedestrian bridge crossing the Rock River will connect with the riverfront recreational path on the DIMCO property. The City has long term plans for extending the recreational path to the west along the Rock River and eventually connecting with regional pedestrian and recreational paths leading to nearby attractions.

4. Availability of Other Funding:
The City of Dixon has leveraged several resources for the cleanup and redevelopment of the DIMCO property. The City funded initial Phase I ESA and focused Phase II ESA activities in 2017 to determine the environmental challenges related to redevelopment. Supplemental Phase II ESA activities were partially funded through a community-wide brownfields assessment grant and assisted by the Illinois EPA Office of Site Evaluation. DIMCO was referred to US EPA for Time Critical Removal Action, which took place in 2019-2021 to address immediate threats to human health and the environment posed by significant contamination from former scrapyard operations. The City of Dixon is applying for Brownfield Cleanup grant funding through US EPA to assist in remaining cleanup of the Property following agency-led Time Critical Removal Action. The City will explore Revolving Loan Fund grants through Illinois EPA to supplement cleanup of the Property as necessary. To advance riverfront development, the City of Dixon has applied for and received an Illinois Transportation Enhancement Program grant for constructing a recreational path aligned along the Rock River and the DIMCO property. 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. Brownfield Cleanup grant funding is integral in supporting remediation efforts in preparation for the upcoming riverfront improvements. Alternative funding sources are not readily available outside of the Brownfield Cleanup grant to support the redevelopment endeavor.

5. Information on Applicant Liability:
- The City of Dixon acquired the Property through abandonment proceedings on May 8, 2019. The previous and most recent scrapyard operator, Dixon Iron & Metal Company, LLC, closed operations in 2017 and administratively dissolved in 2018.
- The City of Dixon has not caused or contributed to any releases of hazardous substances at the Property.
- The City of Dixon has not arranged for the disposal of hazardous substances at the site or transported hazardous substance to the Property.