Applicant Identification: The City of Lorain, Ohio
City Hall, 200 W. Erie Avenue
Lorain, Ohio 44052

Funding Requested:
a. Grant Type: Single Site Cleanup
b. Federal Funds Requested: $438,210 grant requested,
   with no request for waiver of 20% cost share,
   and no request for waiver of the $500,000 limit

Location: City of Lorain, Lorain County, Ohio

Property Information: Stove Works Western Parcel
1200 Long Avenue
Lorain, Ohio 44052

Contacts:
a. Project Director: Max Upton
   City Director of Building, Housing and Planning
   City Hall, 200 W. Erie Avenue
   5th Floor
   Lorain, Ohio 44052
   Phone: 440.204.2085
   Max_Upton@CityofLorain.org

b. Chief Executive: Jack Bradley
   Mayor
   City Hall, 200 W. Erie Avenue
   7th Floor
   Lorain, Ohio 44052
   Phone: 440.204.2002
   Jack_Bradley@CityofLorain.org

Population: 63,855
Other Factors:

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Narrative Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lorain has secured firm leveraging commitment tied directly to the project and will facilitate completion of the project/reuse.</td>
<td>5</td>
</tr>
<tr>
<td>The targeted Stove Works brownfield site is located within an 8-mile, 15 minute drive of the Avon Lake Generating Station, a coal-fired electric power plant, which shut down permanently in September 2021.</td>
<td>6</td>
</tr>
<tr>
<td>Project located in Census tract with &gt;20% of population living below the national poverty level (2019 ACS estimates): 38.7% of the residents of Lorain Census Tract 973 live below the federal poverty line, almost double this EPA Other Factor rate.</td>
<td>1, 4</td>
</tr>
<tr>
<td>Persistent Poverty: This project is located in Census Tract 973, an area that has been in persistent poverty for 30+ years.</td>
<td>1, 4</td>
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Acknowledgement Letter from Ohio Environmental Protection Agency: Enclosed

Releasing Copies of Application / Confidential, Privileged or Sensitive Information: N/A
November 30, 2021

U.S. Environmental Protection Agency, Region 5
ATTN: Matt Didier
77 West Jackson Boulevard
Mail Code SB-5J
Chicago, IL 60604-3507

RE: City of Lorain Cleanup Grant Proposal

Dear Mr. Didier:

I am pleased to offer Ohio EPA’s support for the City of Lorain (City) Cleanup Grant Proposal. The City is applying for the cleanup grant totaling $438,210.

The funding the City is requesting under their cleanup grant proposal will use a combination of remedies including soil excavation and disposal, engineering controls through asphalt parking caps and other measures, targeted phytoremediation and in-site remediation, Administrative Controls, activity use limitations, environmental restrictive covenants regarding groundwater extraction and use, soil risk management planning, and other measures. These remedies will support the revitalization of the former Stove Works site. This 7.9-acre site located at 1200 Long Avenue, in the heart of the community, was originally developed in 1894 by the National Vapor Stove and Manufacturing Company as a production site for heaters, stoves and furnaces, and subsequently occupied and operated by several different industrial users and tenants until 1981 – after which it became a blighted dumping ground.

The benefits for the Lorain community from this U.S. EPA Brownfield Cleanup grant will be tremendous, allowing Lorain to remediate and revitalize one of the worst 8-acre blights in the area, cleaning up an old industrial site in the middle of a neighborhood that is impacted with multiple hazardous contaminants, and producing 70 new owner-occupied affordable homes for middle-class families, workers, seniors, and others who need better housing options in this neighborhood.

We look forward to working with the City of Lorain and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2295 or via e-mail at Lisa.Shook@epa.ohio.gov.

Sincerely,

Lisa Shook
Lisa Shook, Manager
Ohio Environmental Protection Agency
Voluntary Action Program

cc: Mayor Jack Bradley, City of Lorain
    Natalie Oryshkewych, Ohio EPA, DERR/NEDO
The City of Lorain, Ohio seeks a $438,210 EPA Brownfield Cleanup Grant which, together with $109,553 in local match resources, will enable Lorain to clean up and revitalize the 7.9-acre “Stove Works” property, a former stove-making and furnace-making factory that closed after 100 years of manufacturing, and then became a blighted and unsafe dumping ground. Acquired by the City of Lorain through a nuisance condemnation in 2016 and fully prepared now for remediation through the Ohio EPA Voluntary Action Program, Stove Works is located in an area of high and persistent poverty and socio-economic distress where nearly 60 percent of residents are people of color. Lorain seeks to move forward on its vision to create 70 owner-occupied, affordable homes in a new sustainable and safe neighborhood at this long-blighted Stove Works brownfield site.

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Background and Description of Target Area: Located where the Black River meets Lake Erie 30 miles west of Cleveland, Lorain was once a mighty steel and manufacturing hub for the nation, but has suffered terrible economic declines in recent decades leading to substantial socio-economic challenges, including the rust belt legacy of 250 vacant and contaminated brownfields and blighted properties. The Ford Assembly Plant – gone. The National Gypsum Plant – gone. Johnson Metals – gone. The iconic Lorain Yard shipyard of the massive American Ship Building Company – long gone. In 2015, Lorain’s two largest employers shuttered, U.S. Steel and Republican Steel, the end of a 15,000 job decline from steel’s peak in Lorain. The closure of dozens of smaller manufacturing companies and the resulting loss of jobs included the shuttering of the Stove Works stove-making and furnace-making factory in 1954 after 64 years of operation, resulting in 500 jobs gone.

With all this loss, the population of Lorain has dropped by 20% in recent decades. The nearly 64,000 people of Lorain now have a poverty rate over 25%, unemployment more than 45% higher than state and national levels, more than three times the rate of people on public assistance as compared to state and national levels, and a median family income of $36,162 that is only 55% of national family income and 62% of Ohio levels. A third of Lorain’s residents are minorities, and more than two-thirds of the residents of Census Tract 973 where the targeted Stove Works brownfield site is located are people of color. In this Stove Works Census Tract 973, unemployment is 66% higher (at 6%) than Ohio and national levels, over 25% of families and 38.7% of individuals are living in poverty that has risen 114% for Blacks in the past decade), and median family income at $19,919 is only 32% of national, 35% of state, and 52% of overall City family incomes (in this tract, median incomes have dropped over 12% in the past decade and over 34% for Blacks in that time). Per capita income of residents in this tract is only $12,908, and more than 44% of people are on SNAP public food assistance. More than 34% of residences in Lorain and 17% of housing units in this targeted tract are vacant, which is more than double the vacancy rate in the State of Ohio and 60% more than the national rate. More than two-thirds of households are rental units, contrasted to the rates of owner-occupied housing units at 56% in the City of Lorain, 66% owner-occupied in Ohio, and 64% owner-occupied in the United States. This area of Lorain is struggling. In Census Tract 973, homeownership levels over the past decade have dropped over 17% for Hispanics and over 76% for Blacks.

Lorain is now seeking to reinvent itself, with a focus on brownfield and blight elimination; the diversification of the economy and jobs base with a focus on health care, education, tourism and the arts; and the stabilization of struggling neighborhoods. That neighborhood stabilization is the focus of the initiative to revitalize the contaminated Stove Works brownfield with new, affordable family housing. As Lorain Mayor Jack Bradley (first inaugurated on January 1, 2020 just as COVID started) testified to the U.S. House of Representatives Select Committee on Economic Disparity and Fairness in Growth in October 2021:

"Housing abandonment coupled with shuttered neighborhood level manufacturing facilities wreak havoc on once stable middle class communities. These ‘forgotten’ brownfields and abandoned homes are situated in the middle of neighborhoods that are consisting of poorer and predominately minority residents that are more often than not renters. As the data indicates, many social issues stem from unstable, unaffordable and poor quality housing. In Lorain, at the median, the rents are unaffordable and home ownership is nearly unattainable for those living at the median. . . . For families in Lorain to access economic opportunities, housing matters. To more fully realize the American Dream home..."
ownership matters. . . . The housing ecosystem only works when all of the pieces work, and it is clear that for some parts of our City the current system is not working. It is therefore imperative that a new economic agenda must provide communities like Lorain the resources necessary to combat blight and abandonment head on.

ii. Description of the Stove Works Brownfield Site: After decades of blight and abandonment at Stove Works since the stove-making manufacturing company closed in 1954 and noxious uses and illegal dumping marked the property, since then, the City of Lorain brought serious focus on the “Stove Works” site beginning in 2014. Lorain is now poised to move forward on cleanup and revitalization of a 7.9-acre portion of Stove Works which the city now owns, if Lorain can secure EPA grant funding to leverage local resources for this project.

This Stove Works neighborhood is a mostly working-class and middle/low-income residential area south of downtown and the Lake Erie waterfront, and west of the Black River. The population of Census Tract 973 is more than 33% Hispanic/Latino and 27% African American. There are 21 single-family, workforce and middle-income homes immediately adjacent to and surrounding the Stove Works site, which is bordered on the east by Long Avenue, on the south by W. 13th Street, on the west by Washington Avenue, and on the north by an active Norfolk Southern freight rail track (which used to serve rail spurs on the Stove Works property). Also to the west of the Stove Works site is the 5.6-acre Pawlak Park owned and operated by the City and, just across the railroad tracks to the northeast of Stove Works, the city’s 4.2-acre Streeter Park includes a beautiful, restored 1903-era Carnegie Library which now is the headquarters and museum for the Lorain Historical Society.

This 7.9-acre “Stove Works Western Parcel” site located at 1200 Long Avenue in Lorain, OH 44052 in the center of the community, was originally developed in 1894 by the National Vapor Stove and Manufacturing Company as a production site for heaters, stoves and furnaces, with as many as 500 factory workers at its peak, many of whom lived in the surrounding neighborhood housing. Known manufacturing uses and activities on the Stove Works site included stamping, pickling, enameling, japanning, metal stripping, a burner room, a carpenter shop, a sandblasting operation, an assembling and shipping structure, a die house, a finished products warehouse, a former oil tank area, a former gasoline tank area, an iron oil tank storage building, railroad spurs, printing and crating activities, and various other factory buildings and uses. However by 1954, the Magic Chef Company, successor to the National Vapor Stove Company, determined to close the Stove Works plant. Despite efforts by the then-Lorain mayor to negotiate with Magic Chef about keeping the operation from moving offshore, the Stove Works site was permanently closed. Stove Works was subsequently occupied and operated by several different industrial users and tenants until 1981 – after which it became a blighted dumping ground.

In 2014, the City of Lorain sued the then-owner of the Stove Works property, Lorain Properties Co., LLC, in a nuisance condemnation action for illegal dumping and unsafe conditions on the site. The City and its economic development authority the Lorain Port Authority worked with Ohio EPA to retain the firm Hull & Associates and its environmental professionals, who in 2014 conducted a Phase I Environmental Site Assessment on the private owner’s site which was compliant with ASTM E1527-13 and Ohio EPA VAP requirements. In July 2015, Hull conducted a limited Phase II environmental site assessment on the Stove Works Western Parcel. Then the City of Lorain announced in January 2016 a settlement of the nuisance condemnation with Lorain Properties Co., under which Lorain Properties agreed to transfer the site to the City of Lorain, agreed to provide funding to Lorain for environmental conditions, abated asbestos containing materials from the Stove Works site, and demolished a decrepit building there. On May 20, 2016, the City of Lorain acquired the Stove Works Western Parcel site consisting of 7.9 acres, based on this condemnation suit. Since that 2016 acquisition, the Stove Works Western Parcel site has remained vacant, unoccupied, unused, and secured by fencing.

Lorain contracted the firm TRC Environmental and its environmental professional to conduct an Asbestos Survey in May 2018. In June 2018, the City of Lorain completed a study recommending that the Stove Works property could be deemed “spot blight” under standards established by the U.S. Department of Housing & Urban Development’s Community Development Block Grant (CDBG) regulations, as Stove Works constituted a threat to human health, safety, and public welfare. On June 18, 2018, the Lorain City Council deemed Stove Works a place of spot blight, and allocated $241,000 of the City’s allocation of HUD CDBG funding that was used to remove piles of construction and other debris which had been dumped by previous owners at the site, under supervision by TRC Environmental. Also, Lorain utilized TRC
Environmental to conduct an updated and revised Phase I assessment in March 2019, and an updated and more complete Phase II assessment in August 2019, as well as a Geophysical Survey from another contracted firm in October 2018.

Based on these environmental investigations, Lorain has determined that there are known hazardous substances found at the site including the following chemicals of concern and media above applicable Ohio EPA VAP residential standards: antimony, arsenic, chromium, copper, lead, and PAHs which exceed the direct contact residential VAP standards for soil; and arsenic and PAHs which exceed the direct contact standards for commercial/industrial end-use. Further, concentrations of chlorinated VOCs in soil gas in some portions of the parcel are above screening values for Vapor Intrusion to indoor air. There have been no contaminants of concern have been detected in the five groundwater monitoring wells that were placed on the Stove Works Western Parcel as part of the Phase II investigation. While one groundwater monitoring well outside of the Western Parcel boundary on an adjacent property detected exceedances of unrestricted potable use standards (UPUS) for benzo(a)pyrene, the Phase II at the Western Parcel has determined that contaminants of concern above UPUS in groundwater are not migrating beyond the adjacent property boundaries; demonstrated that the affected shallow groundwater will not migrate and contaminate the underlying saturated zones; and determined that there is not a complete drinking water pathway to affected groundwater. Further, Lorain has determined through its assessments and asbestos survey that all asbestos containing materials known to be present within structures and demolition debris piles at the site was mitigated and disposed of by late 2018.

Lorain has been conducting environmental due diligence and investigations of the Stove Works site for years and, indeed, now has a full and complete draft of a Remedial Action Work Plan compliant with Ohio EPA Voluntary Action Program requirements, prepared now for the Stove Works Western Parcel. The City will enter the Western Parcel into the Ohio VAP to reach residential cleanup standards as soon as it leverages the funding needed for remediation (through this EPA grant!).

Please note that the City has not yet acquired, and is not seeking U.S. EPA Brownfield Cleanup Grant funding at this time, for a separate, adjacent parcel that had been part of the original Stove Works factory complex, the 1.7-acre “Stove Works Eastern Parcel.” The private sector owner of that site, Old Lake Properties, has left the site vacant and unused for years, and the City of Lorain is now in the process of negotiating for the acquisition of that site from the current owner, and preparing to update environmental assessments to endure All Appropriate Inquires are fully conducted. For that Eastern Parcel, Lorain plans to apply for grant funding from the newly-enacted Ohio Brownfields Remediation Grant program funded through the Ohio Department of Development Services, which is expected to open that grant process in 2022. Lorain will also take that Eastern Parcel through the Ohio VAP. The cleanup of the Eastern Parcel will allow Lorain to consolidate the entire Stove Works complex into one property for the development of a sustainable, planned neighborhood with new affordable, owner-occupied homes.

b. Revitalization of the Target Area
i. Reuse Strategy and Alignment with Revitalization Plans: As noted in Mayor Bradley’s recent testimony to a House Committee, the lack of affordable housing that is safe and acceptable in Lorain is a major challenge for the neighborhood and the future of the community. This is why Lorain is squarely focused on the dual approach of eliminating blight while fostering the development of affordable, sustainable housing and neighborhoods.

That is the revitalization strategy for Stove Works. After significant input from the neighborhood residents and organizations including El Centro De Servicios Sociales and the Lorain Urban League, the Lorain City Council in June 2021 voted unanimously 11-0 to proceed with a plan to partner with the private sector to revitalize the Stove Works property with development of 70 new, owner-occupied affordable housing units, with mortgages that allow families to spend 30% or less of their income on housing. The City’s plans is to couple this housing development with broader neighborhood efforts already underway, to boost community-supported agriculture, walkability and connectivity, code compliance and neighborhood upgrades, poverty reduction, and other place-making efforts at Stove Works and the surrounding area. A concept plan for the new Stove Works neighborhood combines 70 houses with a Community Resource Center, a mix of new retail, and a large park and promenade along with several pocket parks and recreational courts, all connected by green infrastructure to manage stormwater and boost the aesthetic and sidewalks throughout the grid-street neighborhood pattern.
This approach for neighborhood blight elimination, affordable housing development, and placemaking at Stove Works fulfills key revitalization plans which are guiding the Lorain community. The 2019 City of Lorain Comprehensive Plan (www.cityoflorain.org/DocumentCenter/View/1700/Comprehensive-Plan) calls for demolition or rehabilitation of abandoned properties and vacant buildings, and construction of new infill residential for both seniors and millennials, flavored by fostering a culture-rich environment that prioritizes artists and the arts, and with greater multi-modal connections among neighborhoods and key city hubs. See Lorain Comp Plan at p. 26, “Issues, Opportunities & Big Ideas”. The Comprehensive Plan at pp. 56-58 devotes an entire chapter to the priority of stabilizing vacant properties.

Likewise, this Stove Works project will support and boost other Lorain initiatives to create sustainable, high-quality neighborhoods. The cleanup of this blighted site and the deployment of green infrastructure to manage stormwater runoff from the site will help protect the Black River ecosystem, now thriving and healthy after years of cleanup and green infrastructure deployment, after being designated as an Area of Concern by the U.S. EPA and informally dubbed the “River of Fish Tumors” in the 1980’s, when children were told to stay clear of the river entirely. Note that Stove Works is not in a floodplain. Likewise, the connected streets and sidewalks of the future Stove Works neighborhood will promote better connectivity and walkability in a neighborhood marked with childhood obesity and medical disparities, which is a key goal of the “Lorain Active Transportation Plan” initiative launched in 2018 and maintained by the City of Lorain, Lorain County Public Health, and the Ohio Department of Transportation.

The revitalization of Stove Works is also consistent with, and will connect to, the “Revitalizing and Reconnecting Lorain” EPA Brownfield Areawide Plan unveiled in May 2018 to upgrade the Black River corridor through Lorain in the area just east of the Stove Works brownfield, which calls for the elimination of blight and the upgrade of housing in order to attract new, diversified economic development to catalyst brownfield sites.

**ii. Outcomes and Benefits of Reuse Strategy:** The proposed cleanup and revitalization of Stove Works will boost both economic development and community park and recreational space in a highly disadvantaged community.

First, Stove Works will provide 70 new, quality, affordable houses (serving those making 80% of AMI) for working class families, millennials and seniors. Stove Works will provide affordable owner-occupied homes in a Census tract where more than 17% of residences are vacant structures and 66% of homes are rentals, in a city that has identified the lack of quality homeownership opportunities as a threat to Lorain’s future economic viability and community wealth-building. The 2018 Lorain study which led to the designation of Stove Works as an area of spot blight under HUD standards shows that the houses immediately surrounding this brownfield have depressed values and serious tax delinquency, likely exacerbated by the blighted conditions here.

Second, design of the Stove Works neighborhood will provide a new community promenade and gathering spaces, a new park and recreational area, several pocket parks, a basketball court, and a community resource center for nonprofit and community functions, with walkable connections to the broader community including nearby Pawlak Park, Streater Park, and the Lorain waterfront revitalization area.

Third, this revitalization will all take place in a severely disadvantaged and distressed neighborhood which, as described already, is in a Census tract with median family income at a level only half of the overall city level, 35% of Ohio’s level, and 32% of national incomes, and with 38.7% of people living in persistent, long-term poverty. This is one of the neighborhoods that was identified in redlining maps a century ago, and remains a majority-minority community today. In this Census block, the cost of housing plus transportation for residents is a difficult 46% of total household income, according to the Center for Neighborhood Technology’s “Housing + Transportation Affordability Index Tool”. New, affordable housing in a high-quality Stove Works neighborhood will clearly help uplift families in this struggling area.

c. Strategy for Leveraging Resources

**i. Resources Needed for Site Reuse:** Lorain has continued to develop a solid track record to leverage resources for brownfield assessment, remediation, and reuse and is committed to working with its stakeholders and partners to take advantage of all available resources to support successful reuse of brownfields properties within its jurisdiction, including the Stove Works site. Other potential funding resources have also been identified to leverage and complement cleanup funds to stimulate additional resources for design and engineering, remediation, and subsequent reuse at Stove Works and other
brownfield sites. In Fall 2021, the City of Lorain made use of the U.S. EPA OBLR Land Revitalization tool the “Resource Roadmap”, and established a comprehensive funding and resource leveraging strategy for key city projects including Stove Works.

Already, the City of Lorain has allocated $400,000 of its HUD CDBG resources toward cleanup of Stove Works West Parcel, acquisition of the adjacent Stove Works East Parcel site, and pre-construction design, planning, and infrastructure upgrades for the envisioned affordable housing and sustainable neighborhood revitalization there. Lorain has also secured an additional $100,000 for these Stove Work purposes from the Nord Family Foundation.

Lorain is also prepared to apply for additional grant funding for Stove Works revitalization from the Ohio Department of Development Services when that state agency unveils the Clean Ohio Revitalization Fund in early 2022, which was resurrected by the Ohio legislature and Governor with new law passed this year which puts $350 million into brownfield grants and infrastructure upgrades, and another $150 million into blight elimination projects. Lorain’s priority for that Ohio application will be cleanup of Stove Works Eastern Parcel, and infrastructure upgrades for the entire redevelopment planned there.

Further, the City of Lorain is ready to leverage other resources for Stove Works revitalization, which could include a portion of the City’s $32.5 million in Lorain’s allocation of ARPA Local Fiscal Recovery Funds in this qualified census tract, or further allocations of the City’s annual HUD CDBG allocation for infrastructure upgrades at the site. Lorain will also be ready to work with one of the many private sector development firms who have already conveyed strong interest in competing for the opportunity to be the housing and neighborhood developer for the future, cleaned Stove Works site. The City will utilize its substantial expertise in leveraging private sector equity and debt investment (which could include Opportunity Zone investments in this qualified OZ), Low Income Housing Tax Credits, Tax Increment Financing (a tool Lorain uses well), and other resources to put the Stove Works plans into implementation.

ii. Use of Existing Infrastructure: The Lorain Stove Works site sits on useful established infrastructure that has been in place for more than a century. Three sides of the property are on fully functional city streets, and the site is already served by sewer and water infrastructure. Site upgrades will require the design and deployment of green infrastructure and other stormwater management infrastructure, the cost of which can be handled through allocations from the Ohio Clean Water and Drinking Water State Revolving Loan Fund programs (which received a mighty boost in the Infrastructure Investment and Jobs Act of 2021), through Lorain ARPA Recovery Fund investment, and through private developer contributions. Likewise, as the City of Lorain works with regional, state and federal agencies to seek resources for improved broadband infrastructure access for all citizens and families of Lorain, the city will identify how to use ARPA Recovery Funds, U.S. Department of Commerce NTIA grants, and other sources to bring high-speed broadband to the future residents of Stove Works.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
   a. Community Need
      i. The Community’s Need for Funding: The has already expended over $1.3 million of dollars in acquiring, cleaning, improving, and planning for a better future for Stove Works – and is willing to spend more – but is limited in its financial capacity to handle the entire costs of cleanup of this long-contaminated site, and also retain some level of resources to spark the infrastructure and revitalization upgrades needed to bring private sector development to Stove Works. The City of Lorain has already described the challenging socio-economic factors facing the city as it has lost manufacturing, jobs, and population over the past decades – more than 25% of people in poverty, unemployment at double the national rate, median family income at 60% of the national level, double the number of people on SNAP and cash assistance, low homeownership rates, and so on. Lorain has also described the terrible economic and demographic status of Census Tract 937 where Stove Works is located in Sections 1(a)(i) & (ii) above. Lorain also emphasizes that the community has 250+ brownfields and blighted properties (37% of all residences and 18% of all properties in Lorain are vacant) which the City is working to address slowly and surely, including large catalytic identified as top priorities in the Lorain EPA Areawide Plan. All of these significant factors demonstrate the strong community need in Lorain for support at Stove Works.

      ii. Threats to Sensitive Populations
         (1) Health or Welfare of Sensitive Populations: Again, the City of Lorain overall and Census Tract 973 neighborhood in particular are areas of persistent poverty and low income with a concentrated minority
population. Since the 1970’s and in more recent years, Lorain overall and Census Tract 973 have also struggled with higher prevalence of poverty, crime, vacancy, drug use and population decline as a result of lack of economic opportunity, outmigration, and disinvestment. This impacts the health and welfare of sensitive populations such as children under 5 years old, an age group which has increased by over 26% in the past 10 years (the City has a population of these young children at a rate 18% higher than the State of Ohio, and Census Tract 973 has a population over 8% higher than the state). Lorain County overall ranks poorly in childhood poverty, access to primary care physicians, and premature deaths, according to the County Health Rankings & Roadmaps evaluation tool.

EPA’s EJScreen 2020 tool shows the pollution impacts suffered in Lorain Census Tract 973 targeted here: This Lorain area ranks in the worst quartile in both the State of Ohio and EPA Region 5 for every measure in EJScreen, and mostly in the worst 10 percentile – 97th worst in the state for wastewater discharges, 94th worst for lead paint exposure, 94th worst for proximity to RMP sources, 91st for ozone, 90th for PM2.5, and in the worst 80th percentile for respiratory hazards, air toxics cancer risk, diesel PM, proximity and volume of traffic, and proximity to hazardous waste and Superfund sites. All of those values are in the worst 79-95th percentile in EPA Region 5. The impacts of pollution, and the loss of economic base in Lorain, has been exacerbated by operation of the 680 megawatt, coal-fired Avon Lake Generating Station just eight miles from Lorain, and its permanent shuttering in September 2021.

All of this can be exacerbated by toxic contamination and blight at former factories like Stove Works in Lorain, and all of this could be improved by remediation of contamination, removal of blight, and deployment of healthy, sustainable, connected, and walkable neighborhoods at places like Stove Works, with the support of U.S. EPA.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the EPA Toxics Release Inventory (TRI) and EPA EnviroFacts reporting tool, in the Lorain zip code 44052 where Stove Works is located, there are six major sources of air emissions, 31 brownfields reported in ACRES, two large quantify hazardous waste generators, and 65 RCRA generators of hazardous waste.

These pollution impacts may exacerbate difficult health conditions in Lorain County, including 38% obesity for adults, a high 29% rate of asthma for people under 30, and a higher cancer rate than the U.S. rate and the Healthy People 2020 target objective, according to the Lorain County 2019 Community Health Assessment. Life expectancy in Lorain Tract 973 is significantly shorter (74.7 years) than lifespans in Ohio (77.75) and the U.S. (78.86), based on the Centers for Disease Control and Prevention’s U.S. Small-area Life Expectancy Estimates Project (USALEEP). In Lorain, Blacks have higher death rates from chronic disease and from cancer, and Black/African American infants have nearly the triple the deaths at the time of birth as compared to White infants, while Hispanic/Latino infants have nearly double the deaths, according to County Health Assessment data.

(3) Promoting Environmental Justice: These health, environmental, and social determinant challenges are particularly significant for minority populations in Lorain. According to the EPA EJScreen tool, 72% of the population in this Stove Works Census Tract are people of color. Both the City of Lorain and Lorain County have declared racism to be a public health crisis. According to the August 2021 report “Racial Disparities in Lorain” issued by the Center for Community Solutions and backed by the Nord Family Foundation, children are the most diverse population in Lorain, and children are the highest concentration of Hispanic /Latino people in the county. Black/African American children are 4x more likely than white children to be living in poverty, and Hispanic/Latino more than 3x more likely. Black/African American households in Lorain County are 2.5x more likely to rent than own compared to Whites. With respect to health disparities in Lorain County, Black/Latino populations are 2.4x more likely to be uninsured when compared to White populations.

Stove Works has sat idled and blighted in the heart of a community that is largely African American and Latino, for decades – leading many to believe that their well-being has likewise been abandoned. Lorain’s new Mayor Jack Bradley, the new Councilwoman-elect from this Lorain council ward along with the whole Council, and Lorain’s community development officials are determined to make progress now at Stove Works. This project will remove hazardous substances and blight from the neighborhood, enable the development of 70 new all-affordable owner-occupied houses, and improve the neighborhood with new walkable connections, community parks, and community gardens at the future Stove Works.
b. Community Engagement

i. Project Involvement: This project has been a priority for the community and this South Lorain neighborhood since 2014, many stakeholders are keenly interested in this Stove Works revitalization project, and many key organizations will be involved in implementation. The City of Lorain, the Lorain Port Authority, and the Lorain Fair Housing Board convened the neighborhood and broader community after Lorain acquired Stove Works for 2020 community workshops and input sessions under the umbrella of “2nd Ward Speaks”, the community group for this area of Lorain. This community input effort resulted in a robust action plan, set of neighborhood objectives, and preliminary site plans for the future Stove Works revitalization. This Action Plan galvanized the City Council to support this redevelopment vision in a unanimous vote in June 2021, the plan will guide implementation efforts, and the community convening that produced the plan will foster the continuing involvement of key stakeholders and organizations. ii. Project Roles: Those key organizations for Stove Works cleanup and revitalization will include:

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<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Specific role in the project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Lorain Port Authority</td>
<td>Tom Brown, Executive Director, 440.204.2265, <a href="mailto:brown@lorainportauthority.com">brown@lorainportauthority.com</a></td>
<td>Lead economic development entity in Lorain, will help recruit retail/mixed-use development to future Stove Works</td>
</tr>
<tr>
<td>Lorain Fair Housing Board</td>
<td>Martin Leibas, Chairperson via Matt Kuznir, at 440.204.2304 or <a href="mailto:Matt_Kuznir@cityoflorain.org">Matt_Kuznir@cityoflorain.org</a></td>
<td>Key role to ensure that future Stove Works provides affordable homeownership options</td>
</tr>
<tr>
<td>Ohio EPA, Division of Environmental Response and Revitalization</td>
<td>Chelsea Lamoreaux, VAP Coordinator, 614.644.2285 or <a href="mailto:Chelsea.Lamoreaux@epa.ohio.gov">Chelsea.Lamoreaux@epa.ohio.gov</a></td>
<td>Ohio EPA will oversee the resolution of remedial and liability issues through its Voluntary Action Program, and may support Lorain at Stove Works through its “grant funded technical assistance” program</td>
</tr>
<tr>
<td>Lorain County NAACP</td>
<td>Earl Head, President, Lorain NAACP, 440.989.2339 or <a href="mailto:LorainNAACP@gmail.com">LorainNAACP@gmail.com</a></td>
<td>The NAACP will continue its ongoing role in supporting cleanup, and design of the future Stove Works development, ensuring African American participation and benefits.</td>
</tr>
<tr>
<td>Lorain County Urban League</td>
<td>Parris Smith, President &amp; CEO, 440.323.3364 or <a href="mailto:psmith@lcul.org">psmith@lcul.org</a></td>
<td>The NAACP will continue its ongoing role in supporting cleanup, and design of the future Stove Works development, ensuring equitable participation and benefits for all citizens.</td>
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<tr>
<td>El Centro de Servicios Sociales</td>
<td>Victor Leandry, Executive Director, 440.240.7026, <a href="mailto:vleandry@lorainelcentro.org">vleandry@lorainelcentro.org</a></td>
<td>The NAACP will continue its ongoing role in supporting cleanup, and design of the future Stove Works development, ensuring Hispanic/Latino participation and benefits.</td>
</tr>
<tr>
<td>Lorain County Public Health</td>
<td>Kat Bray, Health Education Specialist, 440.322.6367 or <a href="mailto:kbray@loraincountyhealth.com">kbray@loraincountyhealth.com</a></td>
<td>The County Health Department, which leads the “Lorain Active Transportation Project”, will ensure that the future Stove Works provides options and connections for walkability and biking in and around the new neighborhood.</td>
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iii. Incorporating Community Input: The Stove Works property been the focus of very robust community collaboration, visioning, planning and input already, and the City of Lorain will continue to seek community input throughout the cleanup and site redevelopment process. The City of Lorain convened a robust stakeholder process called “2nd Ward Speaks” to plan for this Stove Works revitalization effort, and held a public meeting solely to discuss the site, in person and via Zoom to accommodate coronavirus concerns, on November 29, 2021. All feedback received during this meeting was positive and supportive of planned reuse activities.

The City will also provide timely updates on project progress via its website, www.CityofLorain.org, and plans to ensure open communication, outreach, and engagement with the citizens who live and work around the Stove Works site through the creation of a designated webpage for the Stove Works cleanup activities with information on opportunities to participate, plans developed with funds, timelines for cleanup activities, and contact information of each project team member. The project team will also connect with the public through regular public meetings, neighborhood association gatherings, social media, print materials, and other outreach strategies designed to gather public input on Stove Works Site Reuse activities and provide opportunities to provide public comment. Project progress and successes will be reported at quarterly City Council meetings and formal minutes will be kept and made available for review on the dedicated webpage.
3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: The City of Lorain and its environmental professionals have already completed a draft Remedial Action Work Plan compliant with the Ohio VAP, which includes expert environmental professional estimation based on consultations with vendors in late 2021. This cleanup plan for Stove Works (Alternative 6 in the attached ABCA) calls for excavation under a worker Health & Safety Plan of approximately 7,300 cubic yards of contaminated surface soil up to four feet below ground surface, screening and manifesting of collected soils to determine appropriate disposal, and off-site disposal of these soils in a register landfill or registered hazardous waste landfill as appropriate, followed by backfilling with clean borrow material from on-site. Some areas of the site may be capped with asphalt (serving as parking facilities and a basketball court) to be further protective and/or to reduce dig-and-haul costs. Although there have been no monitored groundwater exceedances (after substantial monitoring) of Ohio VAP residential standards detected at this Stove Works Western Parcel, Lorain will nonetheless use a deed restriction and other institutional controls to prohibit groundwater extraction or use (all development in Lorain must use city public water). Soil vapor intrusion will be further evaluated before the construction of any occupiable structures in order to determine whether vapor barriers should be designed into such construction. The Lorain environmental professional will conduct confirmatory sampling. All of this will be conducted through the Ohio Voluntary Action Program.

These activities would effectively address the elevated concentrations of antimony, arsenic, chromium, copper, lead, and PAHs which exceed the direct contact residential VAP standards for soil, and arsenic and PAHs which exceed the direct contact standards for commercial/industrial end-use, as well as potential vapor intrusion from chlorinated VOCs.

b. Description of Tasks/Activities and Outputs: Lorain will take the following key steps to ensure the project achieves intended outputs and meets intended goals at the Stove Works brownfields site:

<table>
<thead>
<tr>
<th>i. Task 1—Project Setup, Management &amp; Kickoff:</th>
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<tbody>
<tr>
<td>The Project Manager will be responsible for</td>
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<tr>
<td>programmatic oversight through the</td>
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<td>establishment and staffing of the project</td>
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<tr>
<td>team. The City Lorain, led by the</td>
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<tr>
<td>project manager, will hire an Ohio VAP</td>
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<td>certified environmental professional</td>
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<td>through a competitive bid process</td>
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<td>who will then be responsible for</td>
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<tr>
<td>competitively procuring an environmental</td>
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<td>remediation contractor(s) to complete</td>
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<tr>
<td>cleanup activities. Following procurement,</td>
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<tr>
<td>an initial meeting will be held to kick</td>
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<td>off the project. The project team,</td>
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<td>consisting of the Project Manager,</td>
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<td>the environmental professionals,</td>
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<tr>
<td>and contractor, will proceed to have</td>
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<td>monthly meetings for the remainder of</td>
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<td>the period of performance to ensure the</td>
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<td>project continues to move forward on</td>
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<td>schedule and in a timely manner. During</td>
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<td>this period, Lorain will enter the site</td>
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<td>into the Ohio VAP, and upon acceptance,</td>
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<tr>
<td>submit a Remedial Action Work Plan</td>
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<td>for Ohio EPA review. The Lorain project</td>
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<td>manager will also convene the “2ndWardSpeaks”</td>
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<td>advisory committee and key stakeholder</td>
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<td>organizations for regular periodic</td>
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<td>reviews and input on the revitalization.</td>
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<tr>
<th>ii. Anticipated Project Schedule:</th>
<th>Months 1-3 and ongoing</th>
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<table>
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<tr>
<th>iii. Task/Activity Lead(s):</th>
<th>Project Manager and environmental professional</th>
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<tr>
<th>iv. Output(s):</th>
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<tbody>
<tr>
<td>Project team determined</td>
<td></td>
</tr>
<tr>
<td>Environmental professional procured and remediation contractor procured</td>
<td></td>
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<tr>
<td>Kick-off meeting held</td>
<td></td>
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<tr>
<td>Remedial Action Plan established</td>
<td></td>
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<tr>
<td>Community stakeholders and organizations further engaged in process</td>
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<tr>
<td>Site entered into Ohio VAP</td>
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<tr>
<td><strong>Personnel Costs:</strong> 234 hrs of city staff/project manager, $40/hr salary = $9,240</td>
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<tr>
<th>i. Task 2 – Earthwork:</th>
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<td>The EP will oversee work by the environmental contractor to remove specified contaminated materials totaling approximately 7,300 cubic yards of soil, and placement of clean fill over contaminated soil with backfill, as identified in the Remedial Action Plan. Excavated materials will be manifested and transported to permitted landfill(s) for final disposal.</td>
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<tr>
<th>ii. Anticipated Project Schedule:</th>
<th>Months 4-9</th>
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<tr>
<th>iii. Task/Activity Lead(s):</th>
<th>Environmental Professional and Environmental Contractor</th>
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<tr>
<th>iv. Output(s):</th>
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<tbody>
<tr>
<td><strong>Contractual:</strong> 7,300 square yards of soil excavated, screened, transported and disposed at $50 per cubic yard = $350,000</td>
<td></td>
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<tr>
<td><strong>Personnel Costs:</strong> 110 hrs of city staff/contractor, $40/hr salary = $4,400</td>
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8
i. Task 3: Hardscaping & Paving: The EP will oversee work by the environmental contractor to undertake hardscaping including placement of asphalt parking and basketball court caps, and other hardscaping features.

ii. Anticipated Project Schedule: Months 9-20

iii. Task/Activity Lead(s): EP, Environmental Contractor, and potentially chosen private developer

iv. Output(s): 
   - **Contractual:** Asphalt parking lots and basketball court as caps = $84,000

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**Programmatic Capability and Past Performance**

a. Programmatic Capability

i. Organizational Structure: The project will be managed by the City of Lorain, Director of Building, Housing & Planning with support from staff involved in planning, fair housing, and administrative matters. The manager will also be supported by the City’s Director of Safety & Services and staff from the engineering and public properties departments, as well as the City’s Auditor’s Office, municipal legal counsel (including contracted attorney support), and the Office of the Mayor. This city team will be supported by a procured environmental professional firm to supervise the remediation, manage the remediation contractor, and take the Stove Works site through the Ohio VAP, among other matters.
ii. Description of Key Staff:
The Lorain Stove Works project will be managed by Max Upton, MPA, the City’s Director of Building, Housing, and Planning. Max has years of brownfields and community revitalization experience, and substantial experience in managing federal funding awards and projects including substantial HUD community revitalization funding in his current role. Previous to this Lorain role, he was the Director of Economic Development for Mid-Town Cleveland, a nonprofit organization providing community and economic development, blight prevention and reduction, and other support for the core of that city. He also previously served as Development Coordinator for the firm Pirhl, a brownfield redevelopment firm, where Max led the successful project to convert the closed Carlisle Tire & Wheel factory into workforce housing units as part of the award-winning Carlisle, PA Brownfields Areawide Plan. Max has a Master in Public Administration as well as a graduate certificate in Urban Economics from Cleveland State University, and currently serves as an Adjunct Professor in Economic Development Finance at his alma mater.

The project will be supported by the City of Lorain’s Director of Safety & Services Sanford Washington, whose department includes Building/Housing/Planning as well as Engineering, Public Properties, Utilities and other functions. Mr. Washington served for more than 30 years as President & CEO of an environmental and brownfield cleanup consulting firm. Sanford was an inside linebacker on the legendary football team Michigan Wolverines led by Bo Schembechler from 1978-1982. We hope this does not bother any EPA grant reviewers in the Big Ten Conference.

iii. Acquiring Additional Resources: Lorain will conduct a competitive procurement process to contract with highly qualified environmental professionals to undertake proposed cleanup activities and address the technical requirements of the project. The project team will ensure that contracts for services, including consultant contracts, and conduct cost and price analyses, are completed to the extent required by the procurement provisions of the regulations at 2 CFR Part 200 as well as procurement standards mandated by Ohio and Lorain code. Lorain also expects to receive significant technical assistance and support from the Ohio EPA Office of Environmental Response & Revitalization.

b. Past Performance and Accomplishments
i. Currently Has or Previously Received an EPA Brownfields Grant:
(1) Accomplishments: The City of Lorain was awarded a $400,000 Petroleum Assessment Grant in 2007, a $1,000,000 Cleanup RLF in 2009, and a $400,000 Assessment Grant in 2010. Although these were closed long before any of the current City officials, managers, or staff were with the city, Lorain is pleased to report that the city used these grants effectively. Lorain conducted six Phase I Environmental Site Assessments, five Phase II ESAs, and two remedial plans, at targeted closed steel plants and an abandoned hospital complex. RLF funding went into one key project, the revitalization of a 350 acre former steel/coke works, leveraging $11.54 million in additional resources, creating space for a new municipal waste water treatment plant, and restoring important habitat along the Black River including 52 acres of riparian lands, 23 acres of wetlands including heron rookeries, and creating 600 new fish habitat shelves. See, e.g., www.epa.ohio.gov/portals/30/Brownfield_Conference/docs/Presentations/5A-From%20Brown%20to%20Green.pdf.

Current Lorain officials understand that these EPA grants were all conducted according to the project workplans, schedules, terms and conditions of the EPA agreements; closed out successfully with no funding left/returned; and the outcomes of these grants were all accurately reflected in ACRES.

Lorain also has numerous other federal awards which have been successfully managed and which have produced important outputs and outcomes, including U.S. EPA Great Lakes Initiative grants to restore the polluted Black River watershed, a variety of HUD community revitalization grants, and others.

(2) Compliance with Grant Requirements: Lorain’s history of timely reporting and effectiveness has been borne out through successful federal single audit and EPA specific audits for both programs identified above as well as audits for other federal and non-federal grants including the Department of Housing and Urban Development and the Justice Department. Lorain has consistently followed workplans, stayed on schedule, met milestones, submitted reporting, met all grant terms and has never been cited for any adverse audit findings.
CITY OF LORAIN, OH
STOVE WORKS SITE CLEANUP GRANT APPLICATION
THRESHOLD CRITERIA

Name of Applicant: The City of Lorain, Ohio

1. **Applicant Eligibility:** Incorporated as the Village of Lorain in 1874 and then as the City of Lorain in 1896, the City of Lorain is a unit of local government under the laws of the State of Ohio. Lorain is eligible to be a recipient of EPA Brownfield Cleanup funding.

2. **Previously Awarded Cleanup Grants:** The site proposed for EPA Brownfield Cleanup Grant funding, located at 1200 Long Avenue in Lorain, OH, has not previously been awarded or utilized an EPA Brownfield Cleanup grant.

3. **Multipurpose Grant Funds:** The City of Lorain affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership:** The City of Lorain, OH is the sole owner of the proposed Stove Works Western Parcel site for which it seeks EPA Cleanup Grant funding, and has owned the property in fee simple since 2016, as demonstrated in the attached site deed. The City of Lorain intends to own this site for the duration of the time in which EPA Brownfield Cleanup Grant funds are disbursed for the cleanup of the Stove Works Western Parcel site.

5. **Basic Site Information:**
   a. **Site Name:** Stove Works, Western Parcel
   b. **Address:** 1200 Long Street, Lorain, OH 44052
   c. **Current Owner:** City of Lorain, OH

6. **Status and History of Contamination at the Site:**
   a. **Contaminants:** The site is contaminated primarily by hazardous substances.
   
b. **Operational History and Current Use:** This 7.9-acre “Stove Works Western Parcel” site located at 1200 Long Avenue in Lorain, OH 44052 in the center of the community, was originally developed in 1894 by the National Vapor Stove and Manufacturing Company as a production site for heaters, stoves and furnaces, with as many as 500 factory workers at its peak, many of whom lived in the surrounding neighborhood housing. Known manufacturing uses and activities on the Stove Works site included stamping, pickling, enameling, japanning, metal stripping area, a burner room, a carpenter shop, a sandblasting operation, an assembling and shipping structure, die
house, a finished products warehouse, a former oil tank area, a former gasoline tank area, an iron oil tank storage building(s), railroad spurs, and various other factory buildings and uses including printing and crating activities. However by 1954, the Magic Chef Company, successor to the National Vapor Stove Company, determined to close the Stove Works plant. Despite efforts by the then-Lorain mayor to negotiate with Magic Chef about keeping the operation from moving offshore, the Stove Works site was permanently closed. Stove Works was subsequently occupied and operated by several different industrial users and tenants until 1981 – after which it became a blighted dumping ground.

In 2014, the City of Lorain brought legal condemnation action in court against the then-owner of the Stove Works property, Lorain Properties Co., LLC for illegal dumping on the site, unsafe conditions, and other nuisance complaints. As part of this nuisance condemnation action, the City of Lorain worked with the Ohio EPA to identify the environmental conditions and concerns that may have impacted the Stove Works site. The City worked with the Port Authority of Lorain, an economic development entity created by the Lorain City Council, which used more than $200,000 of its EPA Brownfield Community-Wide Assessment grant, to retain the firm Hull & Associates and its environmental professionals. In August 2014, Hull completed a draft Phase I Environmental Site Assessment on the private owner’s site compliant with ASTM E1527-13 and Ohio EPA VAP requirements. In July 2015, Hull conducted a limited, draft Phase II environmental site assessment on the Stove Works Western Parcel. Hull professionals also participated in the nuisance condemnation litigation action by the City, to testify regarding contaminants of concern and pollution conditions at the site.

The result of the nuisance condemnation action by the City of Lorain was an agreement with the private owner to transfer the site to the City of Lorain, provide funding to the City to cover a portion of expected contamination remediation, demolish a decrepit building, and remove a portion of the debris on site. Lorain took steps to finalize the Phase I environmental site assessment report conducted by Hull as part of this process and, on May 20, 2016, the City of Lorain acquired the Stove Works Western Parcel site consisting of 7.9 acres. Since that 2016 acquisition, the Stove Works Western Parcel site has remained vacant, unoccupied, unused, and secured by fencing.

c. Environmental Concerns / Nature and Extent of Contamination: Lorain’s knowledge and understanding of environmental concerns and contamination is based on a number of environmental site assessments conducted at the site, both before the 2016 city acquisition and more recently. Lorain contracted the firm TRC Environmental and its environmental professional to conduct an Asbestos Survey in May 2018. In June 2018, the City of Lorain completed a study recommending that the Stove Works property
could be deemed “spot blight” under standards established by the U.S. Department of Housing & Urban Development’s Community Development Block Grant (CDBG) regulations, as Stove Works constituted a threat to human health, safety, and public welfare. On June 18, 2018, the Lorain City Council deemed Stove Works a place of spot blight, and allocated $241,000 of the City’s allocation of HUD CDBG funding that was subsequently used to remove piles of construction and other debris which had been dumped by previous owners at the site. Also, Lorain utilized TRC Environmental to conduct an updated and revised Phase I assessment in March 2019, and an updated and more complete Phase II assessment in August 2019, as well as a Geophysical Survey from another contracted firm in October 2018.

In August 2019, TRC Environmental completed a full and complete draft Remedial Action Work Plan (RAP) in order to for the City of Lorain to enter the Stove Works site into the State of Ohio Environmental Protection Agency’s (Ohio EPA) Voluntary Action Program (VAP).

Based on these investigations and remedial plans, Lorain has determined that there are known hazardous substances found at the site including the following chemicals of concern and media above applicable Ohio EPA VAP residential standards: antimony, arsenic, chromium, copper, lead, and PAHs exceed the direct contact residential VAP standards for soil, and arsenic and PAHs exceed the direct contact standards for commercial/industrial end-use. Further, concentrations of chlorinated VOCs in soil gas in some portions of the parcel are above screening values for Vapor Intrusion to indoor air. There have been no contaminants of concern have been detected in the five groundwater monitoring wells that were placed on the Stove Works Western Parcel as part of the Phase II investigation. While one groundwater monitoring well outside of the Western Parcel boundary on the Eastern Parcel detected exceedances of unrestricted potable use standards (UPUS) for benzo(a)pyrene, the Phase II has determined that contaminants of concern above UPUS in groundwater are not migrating beyond the property boundaries; demonstrated that the affected shallow groundwater will not migrate and contaminate the underlying saturated zones; and determined that there is not a complete drinking water pathway to affected groundwater. Further, Lorain determined through its assessments, asbestos survey, and RAP that all asbestos containing materials known to be present within structures and demolition debris piles at the site was mitigated and disposed of by late 2018 under the supervision of environmental professionals at TRC Environmental.

d. **How the Site Became Contaminated:** These hazardous substances are believed to have resulted from stovemaking and furnacemaking manufacturing operations over many decades beginning in 1894 and lasting through 1954. Other industrial users occupied
and used the site through 1981, when it was purchased by Lorain Properties Co., LLC and used for various purposes including dumping of construction and other debris. All contamination of Stove Works Western Parcel too place prior to the 2016 acquisition of the site by the City of Lorain.

7. **Brownfields Site Definition:** The Stove Works Western Parcel site is a “Brownfield” under CERCLA Section 101(39). Lorain affirms that the Site is not listed or proposed for listing on the National Priorities List; is not subject to any unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into parties under CERCLA or any other law, regulation or judicial process; and is not subject to the jurisdiction, custody or control of the U.S. government.

8. **Environmental Assessment Required for Cleanup Grant Applications:** On May 9, 2019, the City of Lorain through its certified environmental professional contractor employed at TRC, conducted a Phase II Property Assessment compliant with ASTM E1903-11, Chapter 3746 of the Ohio Revised Code, and Ohio Administrative Code Rule 3745-300-07. The Phase II sampling consisted of the collection and submittal of soil and ground water samples to an Ohio EPA VAP-certified laboratory for analysis of Identified Area-specific contaminants of concern (COC). The Phase II sampling activities confirmed the presence of COCs in soil and ground water above applicable VAP standards.

Subsequent to that in August 2019, the City of Lorain through TRC conducted a full and complete “Ohio Voluntary Action Program (VAP), Remedial Action Work Plan (RAP), Former Stove Works, 1200 Long Avenue, Lorain, Lorain Count, Ohio 44052”. This RAP has not been submitted to the Ohio EPA VAP, as the City of Lorain must first raise sufficient funding to conduct the remediation.

Previous to the May 9, 2019 Phase II and August 2019 RAP, the City of Lorain through TRC conducted a Phase I Property Assessment in March 2019 at Stove Works, which was compliant with ASTM E1527-13, Chapter 3746 of the Ohio Revised Code, and Ohio Administrative Code Rule 3745-300-06. Lorain through TRC also conducted an Asbestos Survey Report in May 2018. Lorain through Grumman Exploration conducted a Geophysical Survey including Electromagnetic Induction and Ground Penetrating Radar, which determined that there were no potential USTs on the site, which had been suggested by the Phase I investigation.

Previous to these investigations described above, the City of Lorain through a certified environmental professional at Hull & Associates, conducted an Ohio VAP Phase I environmental site assessment in 2014, and a limited Phase II ESA in July 2015 prior to acquiring the project in May 2016, which were finalized in early 2016 as part of an All Appropriate Inquiries process. After acquisition of the site, Lorain had Hull conduct further
site investigations including a revised Phase I ESA focused on five Identified Areas on the Western Parcel, which were completed in February 2017.

9. **Enforcement or Other Actions:** The City of Lorain affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to the Stove Works Site.

10. **Sites Requiring a Property-Specific Determination:** This Stove Works Western Parcel brownfield site does not require a property specific determination from U.S. EPA to be fundable with this Cleanup grant.

11. **Threshold Criteria Related to CERCLA/Petroleum Liability:** The Stove Works Site is contaminated with hazardous substances.

**Landowner Protection from CERCLA Liability – Hazardous Substances:** The applicant City of Lorain is exempt from CERCLA liability and thus eligible for this grant funding through two reasons: First, the City obtained this property by virtue as its function as a sovereign through a nuisance condemnation action undertaken to protect public health and welfare from contamination and unsafe conditions at Stove Works, pursuant to CERCLA Section 101(20)(D). Second, as part of this governmental action to take the site, Lorain also conducted All Appropriate Inquiries and other requirements to qualify for CERCLA liability protection as a bona fide prospective purchaser, as follows:

**Acquisition as a Sovereign through Seizure:** The blighted and unsafe conditions at the Stove Works property were so serious and unaddressed by the then-owner Lorain Properties Co., LLC that the City of Lorain undertook governmental action in its function as a sovereign under its statutory nuisance and code enforcement authorities to ensure that environmental contamination, asbestos-containing debris, illegal dumping, and non-compliant blighted conditions were ceased and removed. To support this enforcement effort, the City of Lorain worked with the Ohio EPA and the Lorain Port Authority (an EPA Brownfield Community-Wide Assessment grantee at the time) to retain certified environmental professionals at the firm Hull & Associates to conduct Phase I, Phase II, and asbestos survey assessments at the Stove Works site.

As the City’s code enforcement orders did not achieve compliance by the private owner of the site, the City brought legal nuisance condemnation action in Ohio state court against Lorain Properties Co., LLC on [date?]. This action included expert testimony from Hull & Associates as to the contaminants of concern at the Stove Works site. As a result of this enforcement action, Lorain Properties, LLC agreed with the City of Lorain to transfer the site to the City, provide monetary compensation to the city to help address pollution conditions, to demolish a decrepit building, and to remove significant portions of illegally dumped debris and materials, all of which happened. The City took title ownership to the property as a result of this nuisance enforcement action on May 20, 2016.
**Acquisition Qualifying Lorain as a Bona Fide Prospective Purchaser**

Although the City of Lorain seized this property through nuisance enforcement action, Lorain nonetheless was determined to understand the pollution conditions at the Stove Works site prior to obtaining this property. Lorain’s environmental due diligence and conduct of All Appropriate Inquiries prior to acquiring the site on May 20, 2016 and its other actions, also qualifies Lorain as exempt from CERCLA liability as a bona fide prospective purchaser, pursuant to CERCLA Section 101(40) and 107(r)(1):

(a) **Information on the Property Acquisition:** The City of Lorain obtained the Stove Works Western Parcel site from private sector party Lorain Properties Co., LLC on May 20, 2016 as a result of a nuisance condemnation action, and has since then until now been the sole owner of the site, in fee simple ownership. There are no familial, contractual, corporate, or financial relationships or affiliations which the City of Lorain had with previous owner/transferor Lorain Properties Co., LLC at the time of the May 20, 2016 acquisition, or before or since that date. Nor does the City of Lorain have any familial, contractual, corporate, or financial relationships or affiliations with any other potentially responsible party with respect to Stove Works West Parcel contamination.

(b) **Pre-Purchase Inquiry:** The City of Lorain conducted All Appropriate Inquiries at the Stove Works site by partnering with the Lorain Port Authority, a municipal economic development entity founded by the City Council of Lorain in 1964. (i) The Lorain Port Authority conducted a Phase I environmental site assessment (ESA) specifically for the City of Lorain, which met the standards of ASTM E1527-13 and the State of Ohio Voluntary Action Program, utilizing a U.S. EPA Brownfield Assessment Grant which had been previously awarded to the Port Authority. This Phase I ESA at Stove Works was completed in draft in August 2014 by Hull & Associates, and then finalized after the condemnation agreement was achieved, within 180 days prior to the May 20, 2016 acquisition by the City of Lorain. (ii) the Phase I ESA at Stove Works conducted for the City of Lorain was prepared by Scientist I Lindsay Crow, supervised by Project Manager Karyn Selle, P.G., both environmental professionals at the environmental and engineering firm Hull & Associates, which is the firm which was procured by the Lorain Port Authority for the Stove Works assessment. (iii) the AA1 investigation by Lorain and the Phase I ESA were completed within 180 days prior to the May 20, 2016 acquisition of the Stove Works Western Parcel site by the City of Lorain.

(c) **Timing and/or Contribution Toward Hazardous Substances Disposal:** All disposal of hazardous substances at the Stove Works Western Parcel site occurred before the City of Lorain acquired the property on May 20, 2016, and in no way or manner has the City of Lorain caused or contributed to any release of hazardous substances at the site, before or after that May 20, 2016 acquisition. The City of Lorain has abated asbestos containing materials and removed construction and other debris from the Stove Works site, but this was done under the direct supervision of certified environmental professionals at the firm.
TRC Environmental, and in no way caused or contributed to a release of pollutants. The City of Lorain affirms that it has not, at any time, arranged for the disposal of hazardous substances at the Stove Works site, or ever transported hazardous substances to the Stove Works site.

(d) Post-Acquisition Uses: The Stove Works Western Parcel site has remained vacant, unoccupied, unused, and secured by fencing since the City of Lorain acquired ownership on May 20, 2016, through to now (December 1, 2021). In June 2018, the City of Lorain received a study from a firm contracted by the City (Lenz Planning & Development Services, of Westlake OH) recommending that the Stove Works property could be deemed “spot blight” under standards established by the U.S. Department of Housing & Urban Development’s Community Development Block Grant (CDBG) regulations, given that the report evidenced findings that Stove Works constituted a threat to human health, safety, and public welfare. On June 18, 2018, the Lorain City Council deemed Stove Works a place of spot blight, and allocated $241,000 of the City’s allocation of HUD CDBG funding that was subsequently used to remove piles of construction and other debris which had been dumped by previous owners at the site.

In June 2021, the Lorain City Council voted unanimously 11-0 to proceed with a plan to partner with the private sector to revitalize the Stove Works property with development of 70 new, owner-occupied affordable housing units (with mortgages that allow families to spend 80% or less of area median income), along with broader neighborhood efforts to boost poverty reduction, community-supported agriculture, walkability and connectivity, code compliance and neighborhood upgrades, and other place-making efforts at Stove Works and the surrounding area. None of these uses have yet commenced, given the need to clean up the site.

There is no need to describe current or prior users at Stove Works Western Parcel during the time of the City of Lorain’s ownership, as there have been no such users.

(e) Continuing Obligations: The City of Lorain has taken reasonable steps to prevent continuing releases or threatened future release of a hazardous substances, and to prevent or limit exposure to previously released hazardous substances at the Stove Works West Parcel. This includes procuring and working with certified environmental professionals at TRC to conduct an additional and updated Phase I environmental site assessment, to conduct a Phase II environmental site assessment, to conduct an asbestos survey, and to draft a full and complete remedial action work plan at the Stove Works Site (as well as obtain a Geophysical Survey from another firm). These additional environmental investigations confirm that there is no indication of any migration of contaminants by soil, groundwater, or other exposure pathways to off-site locations.
Further, the City of Lorain allocated $241,000 in its HUD CDBG resources to the abatement, removal, and property disposal of debris and asbestos containing material that had been left at the site by previous owner(s). In addition, the City of Lorain has maintained fencing around the Stove Works Western Parcel, worked with adjacent residential neighbors, and provided police patrols at and around the Stove Works site to prevent trespassers or other unauthorized persons from entering the property.

The City of Lorain confirms its commitment to comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls at the Stove Works Western Parcel; to assist and cooperate with those performing the cleanup of Stove Works Western Parcel including by providing access to the property; to comply with all information requests and administrative subpoenas that have or may be issued in connection with the Stove Works Western Parcel property; and to provide all legally required notices with respect to the Stove Works Western Parcel property.

12. Cleanup Authority and Oversight Structure:

a. Site Cleanup Oversight: The City of Lorain’s officials managing the Stove Works project will put their significant experience in brownfield revitalization including collaboration with U.S. EPA OBLR and state environmental agencies, as well as specific oversight standards and protocols, into place to ensure effective implementation and oversight of the Stove Works brownfield cleanup. These oversight standards and protocols will include:

i. State Voluntary Cleanup Program: Lorain will enroll the Stove Works Western Parcel site into the Ohio Environmental Protection Agency’s (Ohio EPA) Voluntary Action Program (VAP) to ensure an adequate Remedial Action Workplan and adequate cleanup that will be protective of human health and the environment. The City of Lorain has already conducted significant planning and discussion with Ohio EPA for entry of Stove Works into the OH EPA VAP, including working with certified environmental protections to develop a full and complete VAP Remedial Action Work Plan. Lorain expects to enter the Stove Works Western Parcel site in the Ohio VAP as soon as it secured an EPA Brownfield Cleanup grant cooperative agreement for the grant award sought here, and a notice to proceed.

ii. Environmental professionals: The City of Lorain already utilizes highly-skilled environmental professionals to support brownfields assessment, remedial planning, reuse planning, and redevelopment efforts. These environmental professionals, certified under the State of Ohio EPA’s certified professional program, and others competitively procured to support the City of Lorain in the implementation of its EPA Cleanup program, will boost the City’s capacity and expertise to conduct its
brownfields work. The City expects to competitively procure environmental professionals who are certified to conduct cleanup projects under the Ohio EPA VAP to oversee Stove Works’ remedial planning and cleanup under the VAP. Lorain’s procurement of environmental professionals for its Stove Works brownfield cleanup will be conducted competitively in a process which is compliant with 2 CFR Secs 200.317-200.327.

The City of Lorain is also assisted in the Stove Works project by a practicing environmental attorney at the firm Sustainable Strategies DC who has significant experience in the U.S. EPA Brownfields Program dating back to 1996.

b. **Adjacent or Neighboring Site Access:** Based on extensive assessment and remedial planning already conducted by the City of Lorain with the support of environmental professionals, there is no expectation that cleanup response at the Stove Works site will impact adjacent properties or neighboring sites for any reason.

13. **Community Notification:** The greater Lorain community was given the opportunity to comment from the dates beginning on October 29, 2021 and ending on November 30, 2021, including at a Community Meeting held specifically to discuss the Stove Works cleanup application on November 29, 2021.

a. **Draft Analysis of Brownfields Cleanup Alternatives:** A draft ABCA was available for review and copy to any requestor (no requests were made), and was presented at the community meeting held on November 29, 2021.

b. **Community Notification Ad:** The Community Notification Ad was published on October 29, 2021 on the City of Lorain’s web site front page under its “News Flash” section, which is the normal method used by the City of Lorain for important community notifications and public meetings. The front page of the City’s web site with the announcement link to this Stove Works grant meeting, and the full announcement of that Stove Works meeting, are both enclosed with this Threshold Criteria as part of Lorain’s EPA application. In addition, on November 21, the main public newspaper, the Lorain Morning Journal, published a full story (enclosed) about the Stove Works site plans, including the plan to seek U.S. EPA grant funding for remediation.

c. **Public Meeting:** A public meeting to discuss the draft applicant and consider public comments prior to the submittal of this application was held from 4:30-5:30pm on Monday, November 29, 2021, with the option to participate both in-person and by Zoom. Other than City officials, two citizens including the Lorain City Councilwoman-elect from the council ward where Stove Works is located, attended this public meeting.
d. **Submission of Community Notification Documents**: see attached supporting documents including the draft ABCA; copy of the City web-based announcement regarding public comment and a public meeting; the story about the Cleanup Grant in the Lorain Morning Journal; the meeting sign-in sheet/participant list; a summary of the public meeting; notes with a summary of verbal comments from the public received during the November 29 meeting (there have been no written comments submitted); and a summary of the responses from the City of Lorain to those public comments.

14. **Statutory Cost Share**: The City of Lorain intends to meet its 20% cost share for the EPA Brownfield Cleanup Grant, and requests no waiver. The total of eligible costs of the Lorain Stove Works Western Parcel Cleanup project is $547,763. Of that amount, Lorain requests 80% from a U.S. EPA Brownfield Cleanup Grant, equaling $438,210. Lorain will meet its match with a mix of cash and in-kind match:

   a. **Sources of Funding**:
      i. $72,790 in City of Lorain HUD CDBG Funds or general funds
      ii. $27,388 by City waiving/assuming allowable Administrative Costs (5% of total project cost)
      iii. $9,375 by City waiving/assuming personnel salary and fringe costs for professional staff time provided by assigned city officials to conducting eligible programmatic grant costs.
   
   b. No hardship waiver is requested by the City of Lorain.

15. **Waiver of the $500,000 Limit**: No waiver requested by Lorain.

16. **Named Contractors and Subrecipients**: No contractors or subrecipients are named in this Cleanup application.