**EPA BROWNFIELD CLEANUP GRANT NARRATIVE INFORMATION SHEET**

| 1. Applicant | City of Fort Wayne, Department of Redevelopment  
| | Citizens Square, 200 East Berry Street - Suite 320  
| | Fort Wayne, Indiana 46802 |

| 2. Funding Requested | a. Grant Type  
| | Single Site Cleanup  
| b.i./ii./iii. Federal Funds Requested and Waiver Request  
| | i. Requested amount: $500,000  
| | ii. We are not requesting a cost share waiver.  
| | iii. We are requesting a waiver increase of $650,000. |

| 3. Location | City of Fort Wayne, Allen County, Indiana |

| 4. Property Information | Former OmniSource Property (AKA North River Development)  
| | Western 8.16-Acre Portion  
| | 1610 North Calhoun Street  
| | Fort Wayne, Allen County, Indiana 46808 |

| 5. Contacts | **Project Director** | **Chief Executive** |
| Name and Title | Jonathan Leist  
| | Deputy Director of Redevelopment |
| Address | Citizens Square  
| | 200 East Berry Street - Suite 320  
| | Fort Wayne, Indiana 46802 |
| Phone Number | (260) 427-1323 |
| Email Address | Jonathan.Leist@cityoffortwayne.org |

| 6. Population | 263,886 (City of Fort Wayne; 2020 Census) |
## 7. Other Factors

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page No.</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
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<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>N/A</td>
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<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
<td>N/A</td>
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<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>N/A</td>
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<tr>
<td>The proposed site(s) is adjacent to a body of water.</td>
<td>Narrative Section 1.b.i Page 3</td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>Narrative Section 1.b.i Page 3</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>
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<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures</td>
<td>Narrative Section 1.b.ii Page 3</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 a letter dated December 1, 2021 from the Indiana Department of Environmental Management (IDEM) acknowledging and endorsing our intent to apply for FY22 grant funds and conduct cleanup activities.

## 9. Releasing Copies of Applications

No confidential, privileged, or sensitive information is being claimed for redaction as part of this application.

N/A = Not Applicable
NARRATIVE INFORMATION SHEET ATTACHMENT

Letter from State Environmental Authority
December 1, 2021

Ms. Nancy Townsend, Director
City of Fort Wayne - Community Development Division
200 East Berry Street, Suite 320
Fort Wayne, Indiana 46802

Re: IDEM Acknowledgement Letter
U.S. EPA Brownfields Grant Proposal
City of Fort Wayne Cleanup Grant
Former OmniSource Property – a.k.a North River Development
1610 North Calhoun Street
Fort Wayne, Allen County, Indiana
UST FID #5531
LUST #2000-05511
EPA ID #IND016319345 & #IND000038067
Brownfield Site #4180207

Dear Ms. Townsend:

This letter is provided in support of the City of Fort Wayne Community Development Division (City) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Cleanup Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that the City of Fort Wayne is requesting an allowable waiver of the $500,000 limit (additional $150,000) for a total of $650,000. IDEM understands that this funding will be utilized to conduct hazardous substances remediation at the Former OmniSource (a.k.a. North River Development) Site which is owned by the City.

It is IDEM's understanding that the City has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered by U.S. EPA (grantee) and by the Indiana Brownfields Program (participant with several sites enrolled for a variety of assistance). IDEM believes the City has the capability to perform the proposed grant-funded activities based on the information provided, noting the following:
The 28.85-acre Site was occupied by a wood products manufacturer, a railroad roundhouse, and a junk yard in 1902. Sanborn® Fire Insurance Maps (Sanborn Maps) identified the construction of a railroad freight station on the area of the junk yard on the southeast corner of the Site by 1918. City directories indicate the railroad roundhouse and locomotive repair facility occupied the central portion of the Site through the early 1950s. Other Site occupants during that time period included an engineering and manufacturing company, a sand and gravel company, a truck equipment and oil company, an auto wrecking yard, an iron and metal company, a pump manufacturer, and a wholesale liquor distributor. Sanborn Maps depict a transformer manufacturer on the west-central portion of the Site from 1950 through the mid-1960s. Superior Waste Material and Tri-State Scrap Baling were listed in city directories on the southwest portion of the Site in 1950. Superior Waste continued to be listed on the Site under varying company names through the 1980s. Sanborn Maps indicate the area of the roundhouse was occupied by an auto parts warehouse, an auto wrecking yard, and a junkyard in the 1960s. Superior Waste Material was replaced by OmniSource Corp, a scrap iron and metals dealer, in city directories in the 1990s. From circa 1950 through circa 1990, several warehouse facilities, an automobile paint and body shop, and retail facilities were located on the northern portion, while properties on the southwestern portion of the Site, west of Calhoun Street, were primarily residences. Most of the residences had been removed as of 1980. OmniSource occupied the properties west of Calhoun Street for additional storage space/retail operations. All buildings are demolished, and currently the Site is vacant.

The City has committed to participating in the Indiana Brownfields Program for grant-funded cleanup oversight. The remediation proposed is soil removal by excavation and off-Site disposal of heavy metals and polychlorinated biphenyls (PCB)-contaminated soil identified through U.S. EPA grant assessment activities.

Located along the St. Mary's River, the Site is anticipated to be developed in phases and will include residential, commercial, recreational (soccer stadium), an event center, and a hotel. A developer has been retained to complete the design and construction and to invest up to $150 million.

IDEM is familiar with this Site which received U.S. EPA assistance through the Indiana Brownfields Program and appreciates the City’s continued efforts to remove environmental barriers in order to facilitate the redevelopment of this brownfield Site. IDEM staff are committed to supporting this project by providing technical assistance and coordination through the Indiana Brownfields Program as applicable.

Based on the information submitted and experience, IDEM considers the City an excellent candidate to receive U.S. EPA grant funding again to continue its brownfields redevelopment efforts, which support Indiana’s brownfields initiative. IDEM looks
forward to continuing its partnership with the City and supports its efforts. For further assistance, please contact Ken Coad of the Indiana Brownfields Program directly at (317) 233-8409 and at kcoad@ifa.in.gov.

Sincerely,

[Signature]

Kevin Davis, Chief
Remediation Services Branch
Office of Land Quality

KD/arh/mmo

cc: (via electronic transmission)
Lindsey L. Maksim, City of Fort Wayne
1 PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Background and Description of Target Area: Fort Wayne, Indiana (“City”), with a population of 265,000, is the 2nd largest city in the state, 77th nationally. Located in the northeast corner of the state, it is the economic engine for 1.5 million people who live within a 60-mile radius. The City’s origin and history are built upon its iconic three rivers: the St. Marys, St. Joseph, and Maumee, which served as a natural transportation system for Native Americans and, beginning in the 1600s, by traders and soldiers as a means of transport from Canada to the Gulf of Mexico. By the mid-19th century, a canal and railroads provided transportation for people and freight, which made the City a center of regional industry. Heavy manufacturing flourished around the periphery of downtown, anchored by magnet wire production, lumberyards, creameries, auto parts manufacturing, and electric power generation.

Like many cities in the Rust Belt, by 1980, the manufacturing foundation had eroded, leading to the exodus of tens of thousands of jobs and leaving behind large buildings and sites on the periphery of downtown. Many of these sites have become vacant and blighted, restricting economic redevelopment and posing health risks to residents in adjacent neighborhoods. Approximately 80-acres of underutilized and/or vacant legacy industrial sites lie along the St. Marys River on the northern edge of downtown. Although the City has largely diversified its economy and is currently experiencing unprecedented revitalization, the effects of legacy industrial sites continue to be one of the most chronic barriers to redevelopment that the City faces.

The Target Area (“TA”) consists of three (3) Census Tracts: Allen County Census Tract 5 (18003000500), Tract 6 (18003000600), and Tract 7.01 (18003000701) and all three are federally designated Opportunity Zone (OZ) census tracts. The TA contains the city’s largest brownfield property, a 29-acre piece of vacant land locally known as North River (“North River”) and its adjacent neighborhoods. It has suffered from significant economic strain and a legacy of industrial job disinvestment. The per capita income ranges from $17,836 - $22,115, poverty rates reach up to 35.7% and home values are 45% of the value of the typical home in the Metropolitan Statistical Area (“MSA”). The abandonment of the industrial and commercial use of North River, left a large portion of the TA vacant, contaminated and underutilized, continuing the downward economic cycle in these neighborhoods. The EIG’s 2020 DCI for the site’s zip code (46808) was 74.8 (at risk, approaching distressed), up from 65 (at risk, near mid-tier) in 2000, indicating that the site area is becoming increasingly more economically disadvantaged compared to the city- at large. The Economic Innovation Group’s (EIG’s) 2016 Distressed Communities Index (DCI) Report ranked Fort Wayne as the 5th most unequal of the largest 100 cities in the U.S. in terms of economic growth and opportunity as it relates to distressed communities.

1.a.ii Description of the Proposed Brownfield Site(s): The subject site (“the site”) that the EPA grant will address, comprises the western 8.16-acres of the vacant North River property. It is situated on the west side of Clinton Street, which is the primary northern gateway into downtown. It is bounded on the south by the St. Marys River, to the west by the Bloomingdale Neighborhood, and to the north by the St. Vincent Villas Local Historic District, which currently accommodates Headwaters Church. It is located at the nexus of Allen County’s 110-mile trail system, adjacent to the central riverfront, and surrounded by amenities and assets like the eclectic Wells Street corridor and Science Central, a STEM museum.

From approximately 1902 through the 1960s, the site has been occupied by manufacturers, a junk yard, a sand and gravel company, a truck equipment and oil company, an auto wrecking yard, an iron and metal company, a pump and air compressor manufacturer, a wholesale liquor distributor, a transformer manufacturer, an auto parts warehouse, bus garages, warehouse facilities, an automobile paint and body shop, and retail facilities. Superior Companies conducted scrap and warehousing operations on site from the mid-1950s through the mid-1980s, until OmniSource Corporation (“OmniSource”) acquired the property. OmniSource, a scrap iron and metals recycling company, most recently occupied the site. Historical aerial photographs show buildings and piles of scrap/debris

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on the site, while the eastern portion of North River was vacant land covered with piles of debris and utilized for scrap storage and processing. Scrap metal processing was discontinued by the mid-1990s and the site was used only for administrative offices. OmniSource moved all operations off-site by 2006 and it has been vacant since. All buildings were removed by 2012. In 2017, the City purchased the site, recognizing that its location was key to catalyzing connections between the riverfront, downtown and surrounding neighborhoods.

Environmental conditions at the site have been assessed numerous times between 1994 and 2021. Most recently, a Hazardous Substances Site Assessment (ASTM E1903-9 equivalent Phase II) was completed utilizing FY19 Brownfields Coalition Assessment Grant funds (CA# BF00E02708). Fill material overlies the majority of the site and varies across the site, averaging 1 to 4-feet, with some areas up to 8.5-feet. Soil analytical results indicate that arsenic exceeding its Indiana Department of Environmental Management (IDEM) Remediation Closure Guide (RCG) Residential Direct Contact Screening Level (RDCL) appears to be extensive and prevalent in the fill material. Arsenic exceeds its RCG Commercial/Industrial Direct Contact Screening Level (IDCSL) on the northernmost and southernmost portions of the site. The northernmost portion of the site is contaminated with lead and mercury exceeding their RCG RDCLs, IDCSLs, and/or Excavation Worker Direct Contact Screening Levels (EX DCCLs); polynuclear aromatic hydrocarbons (PAHs) meeting or exceeding their RCG RDCLs and/or IDCSLs; and volatile organic compounds (VOCs) exceeding their respective RCG RDCLs, IDCSLs, and/or EX DCCLs in isolated areas. No polychlorinated biphenyls (PCBs) were detected in any of the soil samples collected during a recent assessment exceeding their respective RCG RDCLs. Groundwater sampling at the site ceased in 2020. Groundwater samples collected from two (2) locations in October and November 2020 on the north-central portion of the site contained trichloroethene (TCE) exceeding its RCG Residential Tap Groundwater Screening Level (Res TAP GWSL), one (1) of which exceeded its RCG Residential Groundwater Vapor Exposure Screening Level (Res VE GWSL). TCE and naphthalene was also historically detected in isolated groundwater locations and hexavalent chromium (Cr VI) was historically detected in groundwater samples collected from isolated locations on the northernmost and south-central portions of the site. Groundwater impacts beneath the site appear to be limited. No contaminants have been detected in groundwater samples collected from the site at concentrations exceeding commercial/industrial screening levels.

1.b Revitalization of the Target Area. 1.b.i Reuse Strategy and Alignment with Revitalization Plans: As Fort Wayne’s downtown has recovered from years of disinvestment, strategic public-private partnerships have accelerated growth, community pride, investment, and regional attention, which has reversed decades of outmigration. The key to its growing revitalization is bold visioning and strategic implementation. Beginning in 2015 and culminating with the 2021 adoption of the Riverfront Development Implementation Framework (the “Riverfront Plan”)5, residents, local government, businesses and community partners worked together to create a vision that aimed to rediscover the central riverfront of the St. Marys River through the creation of public space and access points along the river, blending seamlessly and purposefully with private development at a public investment in excess of $100 million. The initiative seeks to extend downtown’s reach by redeveloping legacy industrial sites along the central riverfront into a vibrant mixed-use district through increased density, diverse housing opportunities, employment opportunities, and by connecting existing assets, hubs and neighborhoods to each other and to the riverfront.

A key concept of the Riverfront Plan (“Riverfront”) is creating development opportunities for the private sector. Phase I of Riverfront public space opened in 2019 with the unveiling of the award-winning $20 million Promenade Park, which sparked an immediate $90 million private investment (The Riverfront at Promenade Park, 6-story multi-use building) on an adjacent site, as well as a $67.5 million mixed-use project located nearby poised to break ground in 2022. Phase II of Riverfront public space, expected to break ground in 2022, is adjacent to the site. Phase II will include a tree canopy trail, park space, wetland boardwalk, open air pavilion, streetscape, and boat docks and is anticipated to catalyze more investment.

Over the past year, the City has worked with a development team to revision the 8.16-acre site as a mixed-use commercial and residential district ($63 million investment) consisting of approximately 43 townhomes, 96 multi-

5 https://www.fwcommunitydevelopment.org/images/reports_studies/riverfront_plan_reduced.pdf
family residences, and 113,100 ft² of mixed-use space for retail and offices. The project includes connections to adjacent trails, parks and Riverfront public space. This district is just Phase I of reactivating the entire 29-acre North River property. The remaining tract will be developed into a professional soccer stadium, hotel, event center and athletic fieldhouse ($237 million investment). The addition of the office, retail space, residences, park access and other quality of life amenities supports the City’s goal of fostering cohesive neighborhoods where residents can live, work and play. It will also diversify the types of available housing and add to a market segment that is short supply, according to a 2021 housing study completed by Zimmerman-Volk. The southern portion of the site will accommodate two mixed-use buildings that have already attracted the interest of several local and regional businesses. New office space is critical to address downtown’s continued growth, as recent surveys of the downtown office market show historically low vacancy rates (under 10%). Greater Fort Wayne, Inc., the City’s Local Economic Development Organization, consistently notes that the lack of available downtown office space has been a significant detriment to attracting businesses to the region. Their research showed that existing Class A space, with 50,000 ft² contiguous space (typically sought by small to medium sized businesses), is particularly in short supply.

The development team has worked closely with neighborhood leaders, City staff, stakeholders, architects, engineers, and regulatory agencies to create a development that aligns with community planning efforts and that is embraced by city residents. The scale and proposed uses for the site will serve as a buffer and transition area between the adjacent Bloomingdale neighborhood to the west and the more intensively used recreational uses of the future event center and soccer stadium. The site is well-served by public transportation, and is within walking distance of many amenities and jobs located downtown and along the nearby Wells Street corridor that further support activation of the TA.

In order for the site to be safely utilized for residential and commercial purposes, overlying, contaminated fill material on the site must be addressed. The southern portion of the site lies adjacent to the St. Marys River and is located in Federal Emergency Management Agency (FEMA) floodplain Zone X, which is outside of the “100-year floodplain.”

**1.b.ii Outcomes and Benefits of Reuse Strategy:** Currently, the site is a large vacant property with hazardous substance contamination that prohibits commercial and residential development. It contributes to the blight of the TA and brings in no tax revenue. The site’s redevelopment is just phase I of the larger North River development. Both are expected to bring substantial social and economic benefits to the disadvantaged TA, the City as a whole, and the greater region. In May 2021, Applied Economics, a national consulting firm, completed an economic impact analysis of the entire $300 million, 29-acre North River redevelopment plan. The mix of uses are projected to bring in over 500,000 annual visitors, $72.1 million in direct labor earnings, $178 million direct economic impact, $134,600,000 indirect impact and add 1,433 permanent jobs. The full plan is expected to generate $24.28 million in tax revenue over 10 years. Although the site constitutes only a portion of the above study, its redevelopment contemplates a $63 million private investment and supports the larger economic initiatives and mixed-use design of the full North River redevelopment plan. The private investment will bring 8.16 acres of active use back to the taxing rolls. Increased access to downtown trails promotes greater walkability and encourages investment within and surrounding the TA.

Currently, the median home value of the TA is only 69.5% of the Fort Wayne MSA average home value⁶ and 92.4% of the residences were constructed in, or prior to, 1979⁷. Existing residents in the TA will benefit from increased property values and the addition of homes with less maintenance costs and more energy efficiency. The new residential units are planned to be built according to the ICC-700 National Green Building Standard to comply with HUD requirements and will have electric vehicle charging stations. New sidewalks constructed as part of the development will provide residents with better connectivity to the adjacent park and trails encouraging walkability, access to fresh air, physical activity, outdoor engagement and activities. Healthy, cost effective housing and access to the outdoors increases the quality of life in a currently blighted area. The mixed-use

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⁷ US Census American Community Survey (ACS) 2019 5-year estimates.
buildings support use by retail and restaurants that would encourage constant activity and keep eyes on the street. They also have the potential of holding up to 450 office employees, creating additional capacity for small and medium-sized businesses which brings new job opportunities and spending consumers to the TA. One use of a mixed-use building will be the relocation of the regional headquarters of a national organization serving at-risk children. Approximately ¾ of their building users are spending consumers 7 days-a-week. They believe the site is important because its access to the riverfront and downtown will excite existing staff and volunteers but also encourage new people to join the organization. The direct access to trails, further supported with their expanded bike fleet, will encourage cost effective and outdoor play for their volunteers and participating youth. Construction, expected to start within 6 months of gaining the regulatory approval letter, will add 535 local construction jobs ($26,917,990 in direct wages). The new buildings are expected to open following 18-24 months of construction. This thoughtfully-conceived development is pivotal to bringing economic investment, jobs and housing to the TA and city.

1.c Strategy for Leveraging Resources. 1.c.i Resources Needed for Site Reuse: The City has a proven track record of leveraging local and grant funds to catalyze private investment, bringing in over $1.1 billion in downtown investment since 2004. The $650,000 cleanup grant will be used to leverage $63 million in private and $4.9 million in public funding. The construction of the project will be funded by the private developer with a $3 million READI grant (through the State of Indiana), and lines of credit from two local banks that have expressed interest in financing the project. The City expects to participate financially through real estate donation, environmental remediation ($810,776), relocating existing infrastructure such as power lines ($1.5 million), reimbursement for the cost of public infrastructure ($2.25 million). The Allen County Capitol Improvement Board provided the funds for the City to purchase the $1.83 million acreage allowing more City resources to be dedicated to other site costs. The City is also applying for a $3 million US Economic Development Administration Grant towards the riverfront public space, freeing up further city funds to be used for site prep and remediation. The City has also completed the environmental assessments leveraging $113,000 from their current EPA Assessment grant towards the total assessment costs spent of $296,000 in preparation for this development. The rest of the assessment costs were financed through the County Economic Development Income Tax (CEDIT) Brownfield Fund. Annually, $200,000 is allocated towards brownfield assessment and remediation. This fund will also be used towards the 20% remediation match. Outside of the CEDIT brownfield funds, the site is in a Tax Increment Financing (“TIF”) district, which captures incremental increases in property tax attributable to the project and uses them to pay back the cost of public infrastructure (streets, trails, sidewalks and storm sewers) and any additional remediation that might be needed. Outside of TIF, the City anticipates using Local Income Tax revenue, a portion of which is specifically dedicated to economic development in the Riverfront district. Not only will EPA grant funds be used as leverage to unlock this site’s development, the success of this project brings in tax dollars that will be used towards the completion of the North River development ($237 million).

1.c.ii Use of Existing Infrastructure: The site is located in a long-established City neighborhood and in an area fully served by existing infrastructure, including sanitary sewer, water, natural gas, electric, high speed internet and paved streets. Given the dense and mixed uses of the site, ease of transportation is critical. The site is easily accessible from Interstate-69 (with access ramps located 2¾-mile to the north), and it is located on the main corridor into downtown Fort Wayne. The site is directly serviced by the local Citilink 8 bus route, with an approximately 10-mile span. Finally, the site is optimally located adjacent to a multi-purpose pedestrian and bicycle transportation corridor (the “Rivergreenway”) along the southeast boundary of the site. The availability of multiple forms of transportation is exceptionally aligned with the needs of the community that will be served by the development.

While the City’s existing infrastructure supports the development, there are additional needs specific to the site design. New sewers, water connections and surface parking will be needed while new sidewalks and streetscapes connect the site directly to the Rivergreenway and Riverfront. The development team has agreed to pay for the infrastructure through their loans under an agreement that the City will reimburse with TIF funds.

2 COMMUNITY NEED AND COMMUNITY ENGAGEMENT 2.a Community Need. 2.a.i The Community’s Need for Funding: The opportunity to develop this site and enhance the TA is a tremendous
opportunity to benefit a marginalized area. On a citywide basis, the City has committed unprecedented investment in sewers, streets and public safety reducing its ability to invest funds into sites with particular challenges such as hazardous soils. This grant will help meet the needs of a low-income community which lacks the initial funding to address known contamination and redevelop the site without Environmental Protection Agency (EPA) assistance. Two of the three Census Tracts (CTs 5 and 6) which comprise the TA are designated “Qualified Census Tracts” by the U.S. Department of Housing and Urban Development (HUD), where 70% or more of the families have an income which is 80% or less of the statewide median family income. The combined per capita income of the TA is about three-quarters that of the city and two-thirds that of the state. The poverty rate among the TA is more than double that of the county and the state. Childhood poverty in the TA is more than double the rate of the greater Fort Wayne area and more than 2.5-times the national average. The poverty and low-income issues of the surrounding TA negatively affect the tax rolls of the community, leaving little to no funds for brownfield cleanup. Brownfield properties cause continued disinvestment leading to greater health, safety, economic and environmental problems. This grant will help us convert a blighted property into a community asset.

### Data

<table>
<thead>
<tr>
<th>Data¹</th>
<th>Surrounding Neighborhoods²</th>
<th>Fort Wayne</th>
<th>Allen County</th>
<th>Indiana</th>
<th>U.S.</th>
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<tr>
<td>Per Capita Income</td>
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<td>$26,970</td>
<td>$29,160</td>
<td>$29,777</td>
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<td>Poverty Rate</td>
<td>29.9%</td>
<td>16.0%</td>
<td>13.3%</td>
<td>13.4%</td>
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<tr>
<td>Childhood Poverty Rate (&lt;18)</td>
<td>48.3%</td>
<td>24.1%</td>
<td>19.6%</td>
<td>18.5%</td>
<td>18.5%</td>
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</table>

¹ACS 2019 5-Year Estimates; ²Combined and weighted data for CTs 5, 6, and 7.01

### 2.a.ii Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: Impoverished and sensitive populations bear the disproportionate impact of brownfields, representing an ongoing environmental justice concern for area residents. As indicated in the table below and in the previous section, the proportion of children, women of child-bearing age, people without a high school diploma or equivalent, disabled, and/or impoverished residents in neighborhoods surrounding the site, exceed the populations found in the city, state, and country. Almost half of children residing in the TA qualify as impoverished, as opposed to less than a quarter of those in the City. According to the Centers for Disease Control and Prevention (CDC) National Environmental Public Health Tracking Network (NEPHTN) database², the Social Vulnerability Index for Socioeconomic Percentile Vulnerability Rank for the TA ranges from moderate to high at 0.582 to 0.801, while the county has a low to moderate ranking at 0.43. This grant will help the City provide more efficient and safe housing, job opportunities, and increase economic investment back into their neighborhood.

<table>
<thead>
<tr>
<th>Data¹</th>
<th>Surrounding Neighborhoods²</th>
<th>Fort Wayne</th>
<th>Allen County</th>
<th>Indiana</th>
<th>U.S.</th>
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<tr>
<td>Minorities²</td>
<td>25.4%</td>
<td>26.6%</td>
<td>21.1%</td>
<td>16.7%</td>
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<tr>
<td>Children (&lt;18)</td>
<td>26.5%</td>
<td>25.3%</td>
<td>25.8%</td>
<td>23.6%</td>
<td>22.6%</td>
</tr>
<tr>
<td>Children (&lt;5)</td>
<td>7.6%</td>
<td>7.5%</td>
<td>7.2%</td>
<td>6.4%</td>
<td>6.1%</td>
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<tr>
<td>Women 15-44</td>
<td>41.8%</td>
<td>39.9%</td>
<td>39.1%</td>
<td>38.4%</td>
<td>38.7%</td>
</tr>
<tr>
<td>Elderly (&gt;65)</td>
<td>14.5%</td>
<td>14.0%</td>
<td>14.2%</td>
<td>15.4%</td>
<td>15.6%</td>
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<tr>
<td>Adults &gt;25 w/o high school diploma</td>
<td>21.5%</td>
<td>11.5%</td>
<td>10.6%</td>
<td>11.1%</td>
<td>12.0%</td>
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<td>Public Assistance Income</td>
<td>3.1%</td>
<td>2.4%</td>
<td>2.1%</td>
<td>1.6%</td>
<td>2.4%</td>
</tr>
<tr>
<td>% Housing ≤1979</td>
<td>92.4%</td>
<td>65.9%</td>
<td>59.6%</td>
<td>58.6%</td>
<td>53.6%</td>
</tr>
<tr>
<td>With a disability</td>
<td>14.7%</td>
<td>13.6%</td>
<td>12.5%</td>
<td>13.7%</td>
<td>12.6%</td>
</tr>
</tbody>
</table>

²Combined and weighted data for CTs 5, 6, and 7.01; ¹ACS 2019 5-Year Estimates; "Total population - % “white”

² https://ephtracking.cdc.gov/DataExplorer/
suffer from more chronic diseases. The site’s reuse supports healthy, safe and active living reducing the prevalence of disease. It’s connection between public space and the adjacent neighborhood will contribute to more physical activities and fresh air in the riverfront parks and trails away from the heavily trafficked streets that surround the TA. The new homes will also be free of the environmental hazards associated with older homes.

(3) Promoting Environmental Justice: As a significantly contaminated property, centered within a densely residential TA, this site presents a major and long-term contributor to Environmental Justice (EJ) concerns. In addition to the contaminated site, the surrounding neighborhoods are bordered by heavily trafficked streets and 92.4% of homes constructed in 1979 or earlier. The EPA’s EJ Indexes\(^{11}\) was calculated on the site comparing the “community”, as defined by being within ½ mile to the site, to rates in Indiana, EPA Region 5 and the US. The index demonstrates that low-income residents living within ½-mile of the site are disproportionately exposed to contaminants, where ten (10) of eleven (11) variables exceed the percentile for the state, EPA Region 5, and the U.S. The index also shows that residents within ½ mile to the site experience more health impacts than most residents of the State and EPA Region 5., these populations are more at risk of exposure to lead paint than 88% of the residents in the State. The Indiana State Department of Health has identified the lead exposure risk in the surrounding area as moderate to high\(^{9}\). According to the CDC NCHS 2000 database\(^{10}\), the incidence of chronic obstructive pulmonary disease (COPD), asthma, obesity and kidney disease in the TA is all higher than the rest of Allen County indicating that they have a shorter life span and

<table>
<thead>
<tr>
<th>Health Measure</th>
<th>TA Average</th>
<th>County Rate</th>
</tr>
</thead>
<tbody>
<tr>
<td>COPD</td>
<td>10.5%</td>
<td>8.7%</td>
</tr>
<tr>
<td>Asthma</td>
<td>11.5%</td>
<td>10.3%</td>
</tr>
<tr>
<td>Obesity</td>
<td>41.8%</td>
<td>38.0%</td>
</tr>
<tr>
<td>Kidney Disease</td>
<td>3.2%</td>
<td>2.8%</td>
</tr>
</tbody>
</table>

\(^{A}\) Combined and weighted data for CTs 5, 6, and 7.01 (2018)

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the CDC National Center for Health Statistics, the average life expectancy for residents living in the TA is 73 years yet 77.4 years in the state.\(^{9}\) According to the CDC NCHS database\(^{10}\), the incidence of chronic obstructive pulmonary disease (COPD), asthma, obesity and kidney disease in the TA is all higher than the rest of Allen County indicating that they have a shorter life span and

Environmental Justice Indexes Summary

<table>
<thead>
<tr>
<th>Variable</th>
<th>Community %ile in State</th>
<th>Community %ile in EPA Region 5</th>
<th>Community %ile in Nation</th>
</tr>
</thead>
<tbody>
<tr>
<td>EJ Index for Particulate Matter (PM 2.5)</td>
<td>82</td>
<td>80</td>
<td>66</td>
</tr>
<tr>
<td>EJ Index for Ozone</td>
<td>82</td>
<td>80</td>
<td>67</td>
</tr>
<tr>
<td>EJ Index for NATA Diesel PM</td>
<td>84</td>
<td>82</td>
<td>71</td>
</tr>
<tr>
<td>EJ Index for NATA Air Toxics-Cancer Risk</td>
<td>83</td>
<td>80</td>
<td>65</td>
</tr>
<tr>
<td>EJ Index for NATA Respiratory Hazard Index</td>
<td>83</td>
<td>80</td>
<td>65</td>
</tr>
<tr>
<td>EJ Index for Traffic Proximity and Volume</td>
<td>91</td>
<td>89</td>
<td>80</td>
</tr>
<tr>
<td>EJ Index for Lead Paint Indicator</td>
<td>88</td>
<td>84</td>
<td>81</td>
</tr>
<tr>
<td>EJ Index for Superfund Proximity</td>
<td>84</td>
<td>86</td>
<td>77</td>
</tr>
<tr>
<td>EJ Index for RMP Proximity</td>
<td>92</td>
<td>91</td>
<td>87</td>
</tr>
<tr>
<td>EJ Index for Hazardous Waste Proximity</td>
<td>85</td>
<td>84</td>
<td>77</td>
</tr>
<tr>
<td>EJ Index for Wastewater Discharge Indicator</td>
<td>92</td>
<td>92</td>
<td>91</td>
</tr>
<tr>
<td>Demographic Index</td>
<td>82</td>
<td>79</td>
<td>67</td>
</tr>
<tr>
<td>Low Income Population</td>
<td>87</td>
<td>88</td>
<td>87</td>
</tr>
<tr>
<td>Linguistically Isolated Population</td>
<td>85</td>
<td>81</td>
<td>68</td>
</tr>
</tbody>
</table>

10 https://epitracking.cdc.gov/DataExplorer/
11 https://ejscreen.epa.gov/mapper/
12 https://gis.in.gov/apps/isdh/lead/risk.htm
2.iii Incorporating Community Input: The City has a Community Relations Plan (CRP) in-place from a previous RLF Subgrant issued by the Indiana Brownfields Program (IBP). The CRP established an Administrative Index/Information Repository and outlined the previous and future methods of community involvement, including posting legal notices, holding public meetings, and engaging local leaders to inform the community. The CRP also provided contact information for questions and comment submittals. Due to its success, the City plans to update and follow the CRP for this project. The City will update the repository with grant and cleanup information and continue to provide updates to the community via press releases, public meetings, website updates and news interviews on both development and cleanup of the site while adding online public meetings and social media exchanges as popular ways to gain input on the remediation and redevelopment. The development team has already gained the input and support of the adjacent business district and neighborhood association. The City will join their ongoing conversations to ensure that their concerns are addressed and there is open communication on the remediation workplan and ABCA. The City anticipates having a minimum of three public meetings pertaining specifically to this cleanup project. A meeting will be held after the grant award notification, another immediately prior to starting the cleanup, and lastly after cleanup completion. Formal and informal project meetings will be conducted through project planning, approval, and construction to ensure that the public continues to be aware and supportive of redevelopment efforts. An initial public meeting, conducted on November 17, 2021, was held at the city’s offices to discuss the remediation efforts. The sole attendee was a reporter with the Journal Gazette, the area’s daily newspaper, who discussed the proposed cleanup activities with City staff. To date, no comments or questions have been received.

3 TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a Proposed Cleanup Plan. It is estimated that approximately 18,000 tons of impacted surface and near surface soils must be excavated and disposed offsite at an approved landfill in order to mitigate the threat to future site occupants and construction workers. These activities are easy to implement and will expeditiously addresses the environmental concerns with respect to the hazardous substances adsorbed to the surface and near surface soils. The soils will be characterized for disposal and stabilized with Blastox® at up to 5% if found to qualify as hazardous prior to disposal. The excavation areas will focus on areas with the highest contaminant concentrations and will alleviate any long-term effects from direct contact with the surface and near surface soil. The cleanup activities are expected to be completed within 18 months of being awarded the grant and the regulatory approval letter is expected to be received within 3-6 months of completing the cleanup activities.
### 3.b Description of Tasks/Activities and Outputs

**3.b.i Project Implementation, Anticipated Project Schedule, Task Activity Lead, and Outputs:** The scope of work has been organized into three tasks, for which the specific activities, deliverables, and roles are summarized below.

<table>
<thead>
<tr>
<th>Task 1 – Program Outreach/Management</th>
</tr>
</thead>
</table>
| **i. Task/Activity Description:** This task will include management of all programmatic tasks (progress and financial) associated with this cleanup project, including public outreach (meetings and media), issuing and evaluating requests for qualifications (RFQs) from potentially qualified contractors, procuring a Qualified Environmental Professional (QEP), quarterly reporting to the EPA, updating the site status in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES), final grant closeout documentation, and updating/finalizing the Analysis of Brownfield Cleanup Alternatives (ABCA) and Community Relations Plan (CRP).  
*Non-EPA grant resources will include 300 hours ($12,000) of in-kind City personnel, $500 of in-kind supplies (paper/fliers/postage, etc.), and costs (airfare, lodging, per diem, and registration fee) for City personnel to travel to one national conference ($2,500).* |
| **ii. Anticipated Schedule:** RFQ issued once Cooperative Agreement is finalized. QEP selected beginning of Quarter 1. ABCA/CRP finalized in Quarter 1; quarterly and annual reporting throughout grant period; ACRES update when cleanup is complete & redevelopment is initiated; closeout reporting at completion of cleanup. Two public meetings in Year 1, upon grant award and prior to initiating cleanup, and one public meeting in Year 2 following cleanup and prior to initiating redevelopment. |
| **iii. Task/Activity Lead:** This task will be led by the City, with support from the QEP. |
| **iv. Outputs:** Attendance of 1 national conference, finalized ABCA and CRP, quarterly progress reports with budget and schedule status, annual financial reports, 3 public meetings with notes/presentation materials developed, outreach media and/or website(s), ACRES reporting, and grant closeout report. |

<table>
<thead>
<tr>
<th>Task 2 - QAPP/Reporting</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>i. Task/Activity Description:</strong> This task includes all anticipated subcontractor costs associated with preparing, submitting, and obtaining regulatory approval of the site-specific Quality Assurance Project Plan (QAPP), Health and Safety Plan (HASP), Remediation Work Plan (RWP), and RWP Completion Report and Data Evaluation (RCR). All field work will be completed within 1 year of QAPP approval so no updates required.</td>
</tr>
<tr>
<td><strong>ii. Anticipated Schedule:</strong> The QAPP, HASP, and RWP will be developed by the QEP within three months of being procured by the City, completion date 2nd Qtr. Year 1, approval date 3rd Qtr. Year 1. The RCR will be completed by the QEP upon successful cleanup of the site and likely issued in 2nd Qtr. of Year 2.</td>
</tr>
<tr>
<td><strong>iii. Task/Activity Lead:</strong> This task will be led by the QEP, with oversight by the City.</td>
</tr>
<tr>
<td><strong>iv. Outputs:</strong> 1) QAPP x 1, 2) HASP x 1, 3) RWP x 1, and 4) RCR x 1</td>
</tr>
</tbody>
</table>

<table>
<thead>
<tr>
<th>Task 3 - Soil Excavation &amp; Disposal</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>i. Task/Activity Description:</strong> This task includes subcontractor costs associated with waste characterization &amp; landfill profiling, and overseeing excavation, soil mixing (with Blastox®, if necessary), loading, transporting, and disposing of the contaminated soil, as well as confirmation sampling and analysis.</td>
</tr>
<tr>
<td><strong>ii. Anticipated Schedule:</strong> This task will be initiated within three (3) months of approval of the QAPP and RWP, is expected to take 3-6 months to achieve, depending on subcontractor availability and accounting for any unforeseen complications (i.e. weather, special waste disposal considerations, etc.). Start date by early 4th Qtr. Year 1, completion by end of 1st Qtr. Year 2.</td>
</tr>
<tr>
<td><strong>iii. Task/Activity Lead:</strong> This task will be led by the QEP, with oversight by the City.</td>
</tr>
<tr>
<td><strong>iv. Outputs:</strong> Contractor bids, laboratory analytical reports, and disposal manifests</td>
</tr>
</tbody>
</table>
**Former OmniSource Property, Fort Wayne, Indiana**  
**FY2022 US EPA Brownfield Cleanup Grant Application**

### Budget Categories

<table>
<thead>
<tr>
<th>Personnel</th>
<th>Task 1</th>
<th>Task 2</th>
<th>Task 3</th>
<th>Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>Travel</td>
<td>12,000</td>
<td>12,000</td>
<td></td>
<td></td>
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<tr>
<td>Supplies</td>
<td>2,500</td>
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<td></td>
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<tr>
<td>Contractual</td>
<td>500</td>
<td>500</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Other (include subwards, specify type)</td>
<td>1,500</td>
<td>14,500</td>
<td>779,776</td>
<td>795,776</td>
</tr>
</tbody>
</table>

**Total Direct Costs**: 16,500 + 14,500 + 779,776 = 810,776

**Indirect Costs**: 0

**Total Federal Funding**: 0

**Cost Share**: 0

**Total Budget**: 16,500 + 14,500 + 779,776 = 810,776

*No funding is being requested for fringe benefits or equipment. Therefore, these budget categories are not shown.

**Task 1 ($16,500)**: All of the City staff time, supplies, and travel are Non-EPA grant resources (i.e. in-kind services) that apply to the 20% match requirement. The in-kind City personnel time totals $12,000 ($40/hr. x 300 hrs.), the in-kind supplies (paper/fliers/postage, etc.) total $500, and the travel costs for one City personnel to travel to and attend one national conference totals $2,500 (airfare ($750), lodging ($750), per diem ($500), and registration fee ($500)). Contractual costs for QEP to support during public meetings (1 hr./mtg. x 3 mtgs. x $100/hr. = $300), quarterly reporting (1 hr./rpt. x 6 rpts. X 100/hr. = $600) to the EPA, and updating/finalizing the CRP and ABCA (6 hrs x $100/hr. = $600) are also included in this task. **Task 2 ($14,500)**: The contractual cost estimates for Task 2 ($14,500) are broken out as follows: QAPP - $3,500; HASP - $2,000; RWP - $4,000; and RCR - $5,000. **Task 3 ($150,100)**: The contractual cost estimates for Task 3 include all subcontracted costs associated with excavating, mixing, loading, transporting, and disposing of the contaminated soil (18,000 tons @ ~$34.83/ton = $626,946) at an approved landfill, and backfilling and compacting clean fill within the excavation (~$75,600), and conducting the necessary characterization and compliance soil sampling activities (~$52,312) and oversight (~$24,918). The City will cover a portion ($145,776) of the total estimated costs as part of the 20% match and any excess costs beyond the Grant and cost share.

**3.d Measuring Environmental Results**: The following information summarizes the expected short- and long-term outcomes and outputs. **Expected Output(s): Successful cleanup of the Site**: Short term, including receipt of a regulatory approval letter from the Indiana Brownfields Program. Intermediate steps towards this output will be tracked in a spreadsheet and will include: (i) solicitation and selection of a qualified contractor; (ii) development, regulatory approval, and implementation of the remediation work plan; (iii) successful and timely notification of the status of the cleanup project pursuant to the CRP; (iv) successful notification of the cleanup project status to the EPA through quarterly reporting and updating ACRES; (v) volume of contaminated soil removed; (vi) land area prepared for redevelopment **Expected Outcome(s): Successful Redevelopment of the Site & Job Creation**: The expected outcome of the cleanup project is to successfully redevelop the site into a mixed-use residential and commercial district that will connect to the riverfront and parks system and serve as a buffer and transition to the future recreational uses in the area. Measurement toward this outcome will be tracked in a spreadsheet and based upon the following documentation: (i) completion of the construction activities and absorption of the units/commercial space; (ii) job creation- both temporary and permanent; (iii) funds leveraged; (iv) level of additional investment catalyzed by the successful cleanup and redevelopment of the site; and (v) median house value in the TA.

**4 PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### 4.a Programmatic Capability

**4.a.i/ii Organizational Structure and Description of Key Staff**:
The City of Fort Wayne has extensive experience managing successful EPA brownfields grants. Key project team members include Deputy Director of Redevelopment Jonathan Leist, Redevelopment Specialist Lindsey L. Maksim, and Director of Finance Gail A. Bradley. Mr. Leist, (Master’s in Public Administration, Indiana State
University) has 18 years of experience in state and local government management including city planning, redevelopment, hazardous materials management, and municipal financial management and will lead the team. Ms. Maksim (BA, History, University of Saint Francis) has over ten years of experience in Community Development, including six years as coordinator of the City’s Brownfields Program and will be responsible for all grant operations, and management of the environmental consultant. Ms. Bradley (BS, Accounting, University of Evansville) has thirteen years of experience with the City’s Accounting and Finance systems. She will be responsible for establishing and managing the program’s financial accounts and payment requests and transfers. As needed, the City Controller’s Office will also provide financial management support. This experienced project team will be able to quickly and effectively complete all administrative and financial requirements for the grant to ensure the project is successfully completed within the 3-year period. Additional team members, if necessary, would be appointed from within Redevelopment staff involved in the site planning.

4.a.iii Acquiring Additional Resources: To complete the project, the City will require a qualified environmental consultant, who will be selected in compliance with state and federal procurement requirements which includes guidance to attract and utilize women- and minority- owned businesses, when possible. The City has a procurement process in place and has managed the procurement of contractors for multiple state and federal grant projects. Within one month of securing the grant, the City will prepare a Request for Qualifications, direct and oversee the procurement process and select a consultant within three months of the award. The selected consultant will be experienced with the EPA and Indiana Brownfields Program, have the capacity to complete the project in 3 years, be familiar with all programmatic requirements and have a proven track record of success with EPA Brownfields projects.

4.b Past Performance and Accomplishments. 4.b.i Currently Has or Previously Received an EPA Brownfields Grant: (1) Accomplishments: The City has successfully administered the following EPA Grants:

- **BP98533701** (09/01/1998 to 08/31/2000): $200,000 Hazardous Substances Assessment Pilot. Bowser Pump Plant Property has been redeveloped as a YMCA, senior apartments, and a single-family housing neighborhood.
- **BF00E43901** (10/01/2007 to 07/31/2010): $200,000 Petroleum Assessment Grant. 7 Phase I ESAs, 9 Phase II ESAs entered into ACRES during the project period.
- **BF00E00396** (09/01/2010 to 08/31/2013): $200,000 Cleanup Grant for the former Hubcap Express site. The Cleanup was completed and institutional controls are in place. $15.8M was leveraged to redevelop the site as the Headwaters Park near the Riverfront.
- **BF00E00883** (9/1/2011 to 8/31/2014): $400,000 Petroleum and Hazardous Substance Community Wide Assessment Grant ($200,000 Hazardous, $200,000 Petroleum). City wide Public Involvement, 6 Phase I ESAs, 8 Phase II ESAs, 2 Supplemental Assessments, and 4 Cleanup Plans entered into ACRES during the project period. The Former Canton Laundry was developed as a commercial space for a local boutique, with $43,000 leveraged. The former Coca Cola has been redeveloped as a Housing project. Many redevelopment projects are currently occurring and should be complete by 2022.
- **BF00E02708** (10/1/2019 through 9/30/2022): $455,625 Petroleum ($189,125) and Hazardous Substance ($266,500) Community-Wide Coalition Assessment Grant. 10 Phase I ESAs, 6 Phase II ESAs, 2 Supplemental Assessments, 2 Cleanup Plans under development and entered into ACRES. Requests for Proposals for two (2) Riverfront sites (Norfolk Southern and the Former Fort Wayne Police K-9 Training Center) have been distributed.

(2) Compliance with Grant Requirements: The City developed Work Plans and successfully negotiated Cooperative Agreements (CAs) with the U.S. EPA. They complied with the Work Plans and their associated schedules, terms, and conditions. The also submitted and received approval for project Quality Assurance Project Plans (QAPPs) and associated updates, complied with quarterly reporting and annual financial status reporting requirements, and submitted to the U.S. EPA, via the ACRES database, the site information and assessment data for each grant during the respective grant periods. Grant BP98533701 was a pre-law cooperative agreement and tracked by the EPA. All grant funds for the closed projects discussed above were expended within their respective project periods. For active grant BF00E02708 (10/1/2019 through 9/30/2022), despite encountering delays due to the COVID-19 pandemic, approximately 75% of the grant funds have been expended to date and expenditure of the remaining funds is planned.
1. Applicant Eligibility

The City of Fort Wayne, Department of Redevelopment (“City”) is an eligible “General Purpose Unit of Local Government” per CFDA 66.814, and an eligible division of a “local government” under 40 CFR Part 31.3.

2. Previously Awarded Cleanup Grants

The City affirms that the proposed Site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The City affirms that it does not have an active EPA Brownfields Multipurpose Grant.

4. Site Ownership

The City is the current owner of the Site and acquired the Site on November 30, 2017 via warranty deed. The City will retain ownership of the Site throughout the period in which grant funds are dispersed.

5. Basic Site Information

Site Name: Former OmniSource Property (AKA North River Development)
Site Address: 1610 North Calhoun Street, Fort Wayne, Indiana 46808
Current Owner: City of Fort Wayne, Department of Redevelopment

The Site for which cleanup grants fund are being requested is the west 8.16-acre portion of a larger 29-acre tract (“Former OmniSource Property” or “North River Development”) and is comprised of the following parcels of land:

02-12-02-204-004.000-074, 02-12-02-204-009.000-074, 02-12-02-203-009.000-074,
02-12-02-203-010.000-074, 02-12-02-203-011.000-074, 02-12-02-203-012.000-074,
02-12-02-203-013.000-074, 02-12-02-203-014.000-074, 02-12-02-203-015.000-074,
02-12-02-203-016.000-074, 02-12-02-203-017.000-074, 02-12-02-203-018.000-074,
02-12-02-202-011.000-074, 02-12-02-202-012.000-074, 02-12-02-202-013.000-074,
02-12-02-202-014.000-074, 02-12-02-202-015.000-074, 02-12-02-202-016.000-074,
02-12-02-202-017.000-074, 02-12-02-202-018.000-074, 02-07-35-456-008.000-074,
02-07-35-456-001.000-074, 02-07-35-456-002.000-074, 02-07-35-456-003.000-074,
02-07-35-456-004.000-074, 02-07-35-456-005.000-074,

and the northwest 4.99-acres of 02-07-35-457-003.000-074.

6. Status and History of Contamination at the Site

The approximately 8.16-acre Site is contaminated by hazardous substances primarily associated with historical manufacturing and/or scrap metal processing operations at the Site. The soil and groundwater at the Site has been characterized during numerous investigations completed between 1994 and 2021, and most of the contamination on the Site appears to be heavy metals in soil/fill material with thicknesses averaging 1 to 4-feet, with some areas up to 8.5-feet, overlying the majority of the Site. Arsenic at
concentrations exceeding Indiana Department of Environmental Management (IDEM) Remediation Closure Guide (RCG) Residential Direct Contact Screening Levels (RDCSLs) appears to be pervasive, while some locations are also impacted with lead, mercury, and/or polynuclear aromatic hydrocarbons (PAHs) at concentrations exceeding IDEM RCG RDCSLs and/or Commercial/Industrial Direct Contact Screening Levels (IDCSLs).

7. Brownfields Site Definition

The City affirms the Site subject to this application 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; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Applications

A Hazardous Substances Site Assessment (ASTM E1903-19 equivalent Phase II), draft dated November 11, 2021, was completed at the Site in June and July 2021 under the oversight of the Indiana Brownfields Program (IBP) and the IDEM Office of Land Quality (OLQ) Risk Section utilizing Assessment Grant funds (EPA Cooperative Agreement #BF-00E02708-0). The assessment included the advancement of 184 soil borings and the collection of 273 soil samples to characterize the fill material at the Site and to determine whether the underlying native soil was impacted. The results of the assessment were utilized for completion of a draft Analysis of Brownfield Cleanup Alternatives (ABCA).

9. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the Site.

10. Sites Requiring a Property-Specific Determination

The Site does not require a Property-Specific Determination according to Section 1.5 of the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k).

Further, the Former OmniSource Property/North River Development Site was previously determined to qualify as a Brownfields by the IBP and as a Hazardous Substances Site by the EPA for the current EPA Cooperative Agreement discussed above.

11. Threshold Criteria Related to CERCLA/Petroleum Liability

The Site is primarily contaminated with hazardous substances.
11.a. Property Ownership Eligibility - Hazardous Substance Sites

11.a.i. Exemptions to CERCLA Liability

11.a.i.1. Indian Tribes
   Not applicable.

11.a.i.2. Alaska Native Village Corporations and Alaska Native Regional Corporations
   Not applicable.

11.a.i.3. Property Acquired Under Certain Circumstances by Units of State and Local Government
   Not applicable.

11.a.ii. Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability
   Not applicable.

11.a.iii. Landowner Protections from CERCLA Liability

11.a.iii.1. Bona Fide Prospective Purchaser Liability Protection

11.a.iii.1.a. Information on the Property Acquisition

   The Site was acquired by the City of Fort Wayne, Department of Redevelopment as a negotiated purchase from Calhoun Investments LLC on November 30, 2017. The City has fee simple ownership of the Site and there were no, and are no, familial, contractual, corporate, or financial relationships or affiliations with the prior owner.

11.a.iii.1.b. Pre-Purchase Inquiry

   Phase I Environmental Site Assessments (ESAs) of the Former OmniSource Property/North River Development Site were completed by IWM Consulting for the City of Fort Wayne, Department of Redevelopment and the Fort Wayne Redevelopment Commission, respectively, in 2013 and 2017. The Redevelopment Commission was formed under the Department of Redevelopment pursuant to Indiana Code Section 36-7-14 and is responsible for implementing projects and programs to encourage economic development within the City. Specifically, the Phase I ESAs were completed by Mr. Mark Anderson and Mr. Hugh Smith, with over 50-years of combined experience in environmental consulting at the time. The Phase I ESA reports were issued on February 25, 2013 and December 1, 2017.

11.a.iii.1.c. Timing and/or Contribution Toward Hazardous Substances Disposal

   All disposal of hazardous substances at the Site occurred before the City acquired the property and the City did not cause or contribute to any release of hazardous substances at the Site. The City has not, at
any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

11.a.iii.1.d. Post-Acquisition Uses

The City acquired the Site in 2017 for the specific purpose of holding the property for future redevelopment. The Site was vacant and unoccupied upon acquisition and has remained that way since the Site was acquired. The Site has not been utilized for any reason, other than some portions being used as a parking lot, since it was acquired in 2017.

11.a.iii.1.e. Continuing Obligations

As part of the City’s efforts to expand upon its efforts to prevent or limit exposure to previously released hazardous substances, the City has taken several steps prior to, and subsequent to, acquiring the Site. All structures were removed from the Site prior to the City's acquisition of the Site, and no known off-site impacts have occurred since acquisition of the Site in 2017. In fact, the City has taken great lengths to assess the Site, and has partially remediated the Site under supervision of the IBP and the IDEM.

Reasonable steps completed since the City acquired the property in 2017 include further characterization of hazardous substance contamination on the Site, removal by excavation the most contaminated soils of full North River Development Site utilizing RLF-subgrant funding, and installation of fencing to limit access to the Site.

Although the City has made significant progress with respect to characterizing and remediating the Site since it was acquired in 2017, additional cleanup activities are still warranted. As such, the Department of Redevelopment is applying to the EPA for this Brownfields Cleanup Grant for funds to address the contaminants remaining on the west portion of the Site which pose potential threats to human health and the environment and to further prepare the Site for residential and commercial reuse. The City remains committed to:

i. complying with any land-use restrictions and will not impede the effectiveness or integrity of any institutional controls;
ii. assisting and cooperating with those performing the cleanup and providing access to the property;
iii. complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
iv. providing all legally required notices.

11.a.iii.2. Non-Publicly Owned Sites Acquired Prior to January 11, 2002

Not applicable; the Site is owned by the City of Fort Wayne, Department of Redevelopment, and was acquired in 2017.

11.b. Property Ownership Eligibility - Petroleum Sites

Not applicable; co-mingled hazardous substance and limited petroleum contamination may be present at the Site, but the predominant contamination is from hazardous substances.
12. Cleanup Authority and Oversight Structure

12.a. Cleanup Oversight

The City has historically worked with representatives from the IFA, IBP and the IDEM OLQ Risk Section regarding this Site and will continue to work with them during the cleanup phase of this project. The IBP is very familiar with this Site since the City has previously corresponded with them regarding the contamination present at this Site and discussed potential cleanup alternatives. The IBP and OLQ Risk Section have been integral to providing regulatory and technical oversight, especially during the 2021 Hazardous Site Substances Assessment. The IBP will continue to be intimately involved in the Site cleanup activities. All of the future reports and work plans will be submitted to the IBP for their review and the work plans will satisfy the cleanup requirements outlined by the IBP.

The City will also contract with a qualified environmental contractor which employs a licensed professional geologist, licensed professional engineer, or another similar type of qualified professional. The selected contractor will be experienced with respect to remediating these types of properties, understand the requirements of the IBP, and be familiar with the U.S. EPA Grant program. The selected contractor will be responsible for developing and implementing the appropriate remedial work plan.

The City’s Department of Redevelopment Deputy Director, Mr. Jonathan Leist, will also provide oversight with respect to ensuring that all of the tasks are completed on time and submitted to the appropriate agency. The City Brownfields Coordinator, Ms. Lindsey Maksim, will be the primary technical contact for the selected environmental contractor and oversee expenditures associated with the project. Ms. Maksim will also assist in tracking the progress of the project, submit the quarterly updates to the EPA, and work with the other City staff to ensure the competitive procurement process satisfies the 40 CFR requirements.

12.b. Access to Adjacent Properties

In this instance, contamination appears to be defined within the current Site boundaries and an off-site access agreement is not expected to be required for the cleanup project. However, the adjacent property owner to the west of the north portion of the Site (Alliance Property Management LTD) supports this cleanup and proposed redevelopment project and should provide access to their properties if warranted. The City has extensive experience in gaining Right of Entry agreements from property owners for environmental investigation. The City already has a standard Right of Entry request form that it has successfully employed with its EPA-funded Phase I ESA and Phase II ESA projects. The City would employ the same techniques of advising adjacent property owners of the benefits of assisting the City with remediation of environmental contamination, describing the process to be undertaken, and demonstrating the benefits to the property owner. The Brownfields Coordinator is also skilled at obtaining right of way encroachment licenses and permits for investigation on public right of ways in the event that private property owners are not forthcoming with access. Lastly, if necessary, the Indiana Brownfields Program (IBP) and the Allen County Department of Health can assist the City in gaining access to sites for the protection of human health and environment.
13. Community Notification

13.a. Draft Analysis of Brownfields Cleanup Alternatives (ABCA)

The draft EPA application and ABCA, along with the proposed redevelopment and cleanup activities, were presented and discussed with the attendee of the public meeting held on November 17, 2021.

13.b. Community Notification Ad

The City published a Public Meeting Notification advertisement in the regional newspaper, the Journal Gazette, on November 16, 2021. The newspaper advertisement mentioned that a copy of the draft application and ABCA would be available for review during the public meeting; the date, time, and location of the public meeting; where the documents were located for public review; and how to comment on the draft application. The community notification information, including the newspaper advertisement, and a copy of the draft ABCA are included as an Attachment to this Proposal.

13.c. Public Meeting

The public meeting was held on November 17, 2021 at 8:30 a.m. at the Citizens Square community meeting room, located approximately 0.5-miles south of the Site. Representatives from the City of Fort Wayne and IWM Consulting Group, LLC, the environmental contractor awarded the Assessment Grant discussed above, were available for questions/comments. The meeting was attended by a reporter, Ms. Rosa Salter-Rodriguez, with the Journal Gazette, Fort Wayne’s daily newspaper. No other local organizations or neighborhood residents attended the meeting. Since the sole attendee of the public meeting is a member of the press, she could not provide any comments; therefore, a summary of comments and responses from the public meeting is not provided.

13.d. Submission of Community Notification Documents

A copy of the draft ABCA and a copy of the affidavit for publishing a newspaper ad that demonstrates solicitation for public comments on the application that occurred on November 16, 2021, at least 14 calendar days before the application was submitted to EPA, is attached. One (1) person attended the public meeting, Ms. Rosa Salter-Rodriguez, reporter with the Journal-Gazette, Fort Wayne’s local newspaper. No comments were received from the public at the physical or email addresses provided in the Notification. Since the sole attendee of the public meeting is a member of the press, she could not provide any comments; therefore, a summary of comments and responses from the public meeting is not provided.

14. Statutory Cost Share

The City of Fort Wayne annually devotes $200,000 of its County Economic Development Income Tax (CEDIT) to Brownfield redevelopment efforts, which will be utilized to meet the statutory cost share amount of $100,000 to $130,000, dependent on whether a waiver is granted.
15. Waiver of the $500,000 Limit

Please see the attached waiver request for up to $650,000.

16. Name Contractors and Subrecipients

Not applicable.