

November 7, 2023

Anthony Geiger
 EPA Region 3
Geiger.Anthony@epa.gov
 Mail Code 3LD50
 Philadelphia, PA. 19103

Dear Mr. Geiger:

This is to serve as the cover letter to our application for funding from the U.S. Environmental Protection Agency's Community Wide Assessment Grant.

1. Applicant Identification: Lawrence County Economic Development Corporation

2. Funding Requested:

a. Assessment Grant Type: Community Wide

b. Federal Funds Requested: \$500,000

3. Location:

New Castle, PA. as well as
 Lawrence County, PA.

4. Target Area and Priority Site Information:

New Castle, PA.- Census Tracts: 42973000100 – 200 - 300 – 400 - 600 - 700 - 800 – 900.
 West Pittsburg, PA. – Census Tract: 42073011100

Priority Site Addresses:

Site #1 - Former Hospital 1000 S. Mercer, New Castle. 16101	42973000900
Site #2 - Former Drug Store, 119 E. Washington, New Castle 16101	42973000400
Site #3 - Remacor Site, Route 168, West Pittsburg, PA. 16160	42073011100

5. Contacts:

a) Project Director:
 Benjamin Bush
 724-658-1488
bush@lawrencecounty.com
 325 East Washington St.
 New Castle, PA. 16101

PARTNERS:

Lawrence County Regional Chamber of Commerce
 Lawrence County Economic Development Corporation
 325 East Washington Street, New Castle PA 16101 ▪ 724-658-1488 ▪ bush@lawrencecounty.com

b) Chief Executive/Highest Ranking Elected Official:
Benjamin Bush – Chief Executive Officer

6. Population:

Lawrence County, PA.	84,849
New Castle, PA.	21,532
West Pittsburg, PA.	808

7. Other Factors Checklist: (Note – these factors are highlighted in *Italics* in the Narrative).

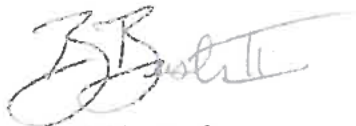
- Community population is 10,000 or less – West Pittsburg – **Site #3**. Page 1.
- Priority sites are adjacent to a body of water – see **Sites #3, 4, 7**. Pages 1.
- Priority sites are in a federally designated floodplain– see **Sites #3, 4, 7**. Page 1.
- Reuse of priority site will facilitate renewable energy. See **Site #1**. Page 1 &3.
- Reuse of priority sites incorporates energy efficiency measures– **Sites #1,2,3**. Pages 1&3.
- Proposed project will improve climate adaptation and resilience– **Sites #1-10**. Pages1&4.

8. Letter from the State or Tribal Environmental Authority – Attached.

9. Releasing Copies of Applications.
Not Applicable.

Thank you for your consideration.

Sincerely,
Lawrence County Economic Development Corporation



Benjamin Bush,
Executive Director

PARTNERS:

Lawrence County Regional Chamber of Commerce
Lawrence County Economic Development Corporation

325 East Washington Street, New Castle PA 16101 • 724-658-1488 • bush@lawrencecounty.com



October 31, 2023

Mr. Benjamin G. Bush
Chief Executive Officer
325 East Washington St.
New Castle, PA 16101

RE: U.S. EPA Brownfields Grant Proposal | State Letter of Acknowledgement
Lawrence County Economic Development Corporation
Lawrence County, Pennsylvania

Dear Mr. Bush:

The Pennsylvania Department of Environmental Protection is pleased to support your efforts to redevelop brownfield properties in your regional area. Returning environmentally challenged and underutilized land and buildings to productive use improves our environment, safeguards our residents, and helps boost Pennsylvania's economy.

The DEP supports the Lawrence County Economic Development Corporation's application for a US EPA Brownfields Community-Wide Assessment Grant in the amount of \$500,000 to conduct Phase I and Phase II Environmental Assessments, as well as develop reuse plans on selected sites in Lawrence County.

The corporation's efforts to examine the redevelopment potential of aggregated, underutilized sites to create renewed neighborhoods and business districts in Pennsylvania is a worthwhile endeavor.

Both Central Office and Regional Office Staff in the Land Recycling Program look forward to supporting Lawrence County Economic Development Corporation and U.S. EPA Region 3 on this project.

If you have any questions, please contact John Gross by email at johngross@pa.gov or by telephone at 717-783-7502.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Maddigan".

Michael Maddigan
Land Recycling Program Manager
Bureau Environmental Cleanup and Brownfields

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a.Target Area and Brownfields (i) Background and Description of Target Area:

Lawrence County sits along the Western border of Pennsylvania about 45 miles north of Pittsburgh and just east of Youngstown, OH. It is in the heart of the rust belt, and has suffered the impacts of the decline of the steel industry in this region. Lawrence County is small, somewhat rural, with a population of 84,849. Our County seat and largest city is New Castle, also our manufacturing hub. New Castle has suffered a slow population decline from a peak in the 1950s of almost 50,000 to its current population of 21,562. Twelve years ago, the City was officially declared a Distressed Community under PA ACT 47, a designation where the Commonwealth oversees the finances of a municipality in order to ensure fiscal solvency. Since 2013 alone, the County has lost six major employers (Ellwood City Community Hospital, Liberty Mutual customer service center, ESB Bank headquarters, PA Youth Detention Center, and two major retailers: Kmart and Sears) prompting a loss of nearly 1,100 jobs. See Section 2 for additional demographic data on New Castle and Lawrence County, also identifying New Castle as a distressed community under EPA’s Climate and Economic Justice Screening Tool (“CEJST”).

The Lawrence County Economic Development Corporation (“LCEDC”) is under new leadership, with a mission to revitalize the County including its manufacturing and employment hub, New Castle. Manufacturing, construction, and distribution are still key components of our economy and account for over 23% of our direct jobs, compared to the State average of 16%. We have excellent transportation access via Interstates 376, 79, and 76. Many of our brownfield sites are candidates for business expansion and relocation, once we address the environmental legacy. With this Assessment Grant, LCEDC will assess sites, repurpose them for job creating uses, and reinvest in the urban core of New Castle, including an incubator/makerspace and cultural center on **Site #2** (below) in New Castle.

1(a) ii. Description of Lawrence County Priority Brownfield Sites: Our priority sites are focused on various aspects of economic revitalization, as described in Section 1.b. **Site #1** is a vacant hospital in a residential area, built in the 1930’s. **Site #2** is a former drug store vacant for several years in downtown New Castle. Based on their age, both sites most likely have asbestos throughout. **Site #3** is a larger facility that produced magnesium granules, highly flammable and hazardous, with a large fire occurring in 2005. **Sites #4-6** are former manufacturing facilities in New Castle. Melting and fabricating metals along with the use of industrial chemicals, resulted in potential contamination at these sites. **Sites #7-9** are disposal or landfill sites, in use long before there were environmental regulations. **Site #10** is a former hotel in New Castle, and based on age, most likely has asbestos throughout.

	Priority Sites	Size		Past/Current Land Use	Site Conditions	Environmental Issues
1	St. Francis Hosp. New,C.	7	1000 S. Mercer	hospital-vacant since 07	residential/nuisance	asbestos exposure
2	Rite Aid, New Castle	2	119 E. Wash.	drug store -vacant	impact bus. District	asbestos, lead paint
3	Remacor, W.Pittsburg	45	Route 168	rare earth metals process	demolished/ hazardous	heavy metals/ Beaver R.
Other New Castle Sites						
4	Former N.C. Foundry	5	400 Hobart	foundry / now storage	vacant/Shenango R.	heavy metals/VOCs/
5	City Trailer	10	1220 Frew Mill	truck trailer manuf.	vacant / blighted / unsafe	heavy metals / sludge
6	Nail Manufacturer	3	539 Cascade	now vacant	vacant / blighted	industrial solvents
7	New C Foundry disposal	8	Riverbank	disposal site	vacant/near River	pathways to River
8	New C. Municipal dump	8	427 S. Cascade	Former mun. dump	vacant	heavy metals, PCBs
9	Construction Landfill	18	Frew Mill Rd.	construction land fill	vacant	asbestos exposure
10	Former Days Inn	4	304 E.North St.	hotel/banquet	partial demo after fire	asbestos/haz. conditions
	TOTAL	110				

1.a.(iii) Identifying Additional Sites. The LCEDC together with its partners has a vast network of contacts with the business, educational, government, non-profit, and general public. Through these networks, we have identified the properties listed in this inventory and will identify others throughout the life of this prospective grant period. We met and will continue to meet one-on-one with site owners. We weigh such factors as whether the owner or buyer is cooperative, the reuse potential of the site, access to transportation and infrastructure, and environmental threats including adjacencies to residents. *We also will prioritize sites from the distressed census tracts in New Castle.* From our experience with managing previous Assessment Grants, the cooperation of the owner is critical to both the completion of the environmental assessment, and the reuse of the site. Consequently, we will only proceed where we can develop a cooperative relationship with the owner/buyer or own the site directly. Since this is a voluntary program, the owner must come to trust us that through the Assessment Grant, we can resolve environmental issues, not just identify them. In turn, we must develop trust in the owner, that they are willing to improve their property and create value such as investment, jobs, or other public benefits.

1. b. Revitalization of the Target Area (i) Reuse Strategy & Alignment with Revitalization Plans

Environmental assessments of these properties combined with Reuse Plans on several priority sites will make them attractive for investment by owner operators and investors. An environmental assessment is an initial step in the process of moving the property back into productive use. In turn, the redevelopment of our priority properties and others in our inventory aligns with our recently updated **Lawrence County Comprehensive Plan** as well as the vision outlined in a 2021 countywide economic development action plan, **Forward Lawrence**. Specifically,

- The **Comprehensive Plan** identifies *brownfield redevelopment* as a high priority for the County and identifies New Castle and the highway entrances to New Castle as growth corridors. It further *prioritizes the urban core of New Castle for reinvestment*, as this takes advantage of existing grids and infrastructure, minimizes sprawl and preserves farmland in our rural areas.
- The **Forward Lawrence Plan** outlines the many strategic advantages of Lawrence County for industrial development including: access to three Interstates, rail access, a one-hour drive to an international airport, and a skilled labor force. It further documents the need for *quality modern industrial/flex space and office space*, and identifies targeted industries including distribution, fulfillment centers, metalwork, plastics, building materials, agribusiness, and *experiential entrepreneurship* such as the craft work and food processing by the local Amish community.

The inventoried brownfield sites informed the development of these Plans and now these Plans advance the development of our **Sites**. **Site #1** provides the land for modern headquarters office space, and we are working closely with a prospective user. **Site #2** is the site for a “Hometown Square” that will feature incubator and makerspace for the local entrepreneurial community, as well as cultural events. **Sites #3–9** are for prospective manufacturing/distribution uses. **Site #3** in particular provides easy access to the Interstate System, and we are planning a modern industrial park. **Site #10** is a possible conversion into low-moderate income housing near the urban core.

(b) ii. Outcomes and Benefits of Reuse Strategy

Brownfield redevelopment was a central principle in both the County Comprehensive Plan and Forward Lawrence. It is also a critical tool toward achieving the goals underlined above and detailed below:

Reinvest in the Urban Core of New Castle. The hospital at **Site #1** is deteriorating and most likely beyond repair. The land, however, is a valuable resource with existing infrastructure and we anticipate

using the Assessment Grant to develop a Reuse Plan for this site. There is strong interest in the property by a regional company that is looking to develop its office headquarters on this site. We project the creation of 100 jobs and an investment of \$10 million. **Site #2** is the focal point for our “Hometown Square” project. The building is a three-story, 40,000 sq.ft. structure with plans to develop the first floor as an incubator/maker space where entrepreneurs can develop products and sell directly to the public. We project the creation of 30 jobs and an investment of \$3 million. It will also bring foot traffic to revitalize the City Center. **Site #10** may be repurposed for housing in the downtown urban core, and we project 40 units and an investment of \$11 million.

Develop Quality Modern Industrial/flex space and Office Space. **Site #3** is the largest of our inventoried sites with good highway and Interstate access. We anticipate using Assessment Grant funds for a Reuse Plan as a multi-site modern industrial park that would house 4 to 5 companies and create over 160 jobs at a total investment of \$20 million. **Sites #4-6** all provide opportunities for a manufacturer/distributor, and we project 50 jobs and \$8 million investment on these sites. **Sites #7-9** are former disposal sites, and our first priority here is to address any contamination and pathways of exposure. Once that is accomplished, we can then focus on future use of these sites, most likely for industrial purposes or solar farms.

In summary, with this Assessment Grant, we project the creation of over 300 jobs at an investment of over \$40 million on our initial inventory of sites. These investments will strengthen the urban core of New Castle, modernize our industrial real estate, and protect public health. We will also encourage development of all properties to high energy efficient standards. This includes using R-20 insulation on exterior walls and up to R-30 for the ceiling and using double or triple pane windows with a low E-factor to further conserve energy. We also encourage energy efficient heating and cooling systems and renewable energy. *For example, on **Site #1** we will work with the future owner to install solar panels as part of the new roof.*

1. c. Strategy for Leveraging Resources (i) Resources Needed for Site Reuse

Over the last ten years, LCEDC has raised over \$40 million in federal and state resources to leverage an additional \$60 million of private investment. With a hopeful 2024 EPA Community Wide Assessment Grant, we will continue this success. In order to attract private investment, LCEDC will pursue the many Federal and State resources available as outlined below:

- Federal Opportunity Zone Tax Incentive – All New Castle **Sites**.
- U.S. Economic Development Administration (“EDA”)– Economic Adjustment Assistance Program – infrastructure in support of re-development of priority **Sites #1-3**.
- New Market Tax Credits — 20-24% credit. – all **Sites** are eligible
- U.S. Appalachian Regional Commission – POWER Grants – another source for infrastructure improvements on Priority **Sites**.
- U.S. Department of Housing and Urban Development – funding through the Community Development Block Grant Program received by New Castle.
- State Enterprise Zone Tax Credits – New Castle **Sites**.
- Redevelopment Assistance Capital Program – can provide grants of up to 50% for development projects – potential source for all Priority **Sites**. – **Site #2** has received a \$500,000 award
- Pennsylvania Industrial Development Authority(“PIDA”) loans to owner/occupied businesses **Sites #3-9**.
- PA. Industrial Site Reuse Program (“ISR”) –funds are currently not available.
- Keystone Communities – potential source of funding for **Site #2**.

1. 1.c.(ii) Use of Existing Infrastructure As part of the planning process leading up to the submission of this application, we targeted sites in areas with infrastructure necessary to support redevelopment. All of our sites are “in-fill”, and serviced by existing water, sewer, electric, and gas, along with public roads. These redevelopment projects will avoid costly public infrastructure. New private laterals may have to be extended to the site from the public road and grids for **Sites #3,7-9**, however, the cost of these laterals will be absorbed by the private development and paid for through the programs described above. The State also provides a PENNVEST loan program for this public infrastructure, with low interest loans available. *The redevelopment of the sites in our inventory will not destroy any greenspace, will not destroy trees or habitat and create jobs while improving the resilience of our local economy and climate by investing in the urban core.* These sites are also walkable from the residential community in New Castle, and this will reduce the dependance on a car to get to work.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need (i) The Community’s Need for Funding –

	New Castle	Lawrence County	PA	US
Population 2022 *	21,532	84,849	12,972,008	333,287,557
Population Change 2010-2020 *	-7.5%	-6.9%	2.4%	7.4%
Unemployment Rate **	12.3%	4.5%	3.5%	3.8%
Poverty Rate *	26.2%	8.5%	11.8%	11.5%
Median Household Income *	\$36,595	\$53,106	\$67,587	\$69,021

* Data are from the U.S.Census American Community Survey available at www.factfinder.2.census.gov/

**Data from the PA. Ctr. Workforce Info. at www.dli.state.pa.us/ New Castle data from CEJST - <https://screeningtool.geoplatform.gov/en/downloads>

As indicated above, both the City of New Castle as well as all of Lawrence County experienced a declining population over the last ten years. In addition, New Castle suffers from a poverty rate that is 2.5 times the state and national average and median family income that is half the national average. Neither the City nor its residents have resources or the expertise to redevelop these brownfields, because of this poverty and declining population. These factors, in turn, impact real estate values and the tax base of New Castle. As mentioned, New Castle had to enter the State’s Distressed Community Program under PA ACT 47 and lacks the resources to address brownfield redevelopment.

2.a. (ii) Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations – Over 19,000 of New Castle’s 21,500 residents are in census tracts identified as disadvantaged by the EPA’s CEJST for purposes of Justice40. Over 40% of these residents are either the young (18 or less) or the elderly (65 and over), who are particularly sensitive to environmental factors such as exposure to contamination from asbestos, lead paint, heavy metals and volatile organic compounds such as those we anticipate finding on **Sites #1-10**. These sensitive residents have an increased risk of exposure as they live in close proximity to these sites. They are exposed to these substances by ingestion or by simply breathing it in, and as indicated below are experiencing increased occurrences of asthma, heart disease, cancers, and premature births among other symptoms. The EPA Brownfields Assessment grant will help us identify and reduce these threats by funding Environmental Phase I and II investigations, which would otherwise not be funded by local government, and then advancing the cleanup and reuse of these sites. In addition, several rivers run through our County including the Beaver, Shenango, and Mahoning Rivers. Consequently, migration of industrial contaminants also moves beyond the boundaries of groundwater plumes. As a result, the PA Department of Environmental Protection has for the past six years posted a “DO NOT EAT” advisory for all fish

species caught in the Shenango River at any point in Lawrence County due to extremely high levels of polychlorinated biphenyl (“PCB”). PCBs cause a wide range of adverse health effects and cancer affecting the immune system, reproductive system, nervous system, endocrine system and other organs. Recent fish tissue samples show more than 10 times the “NO CONSUMPTION” advisory level.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions – Poverty combined with the blighting impact of vacant brownfields have led to higher rates of chronic illness and other adverse health conditions. Based on the most recent PA. Department of Health Data (<https://www.health.pa.gov/topics/HealthStatistics/VitalStatistics/CountyHealthProfiles/Pages/county-health-profiles.aspx>), residents of Lawrence County:

- had higher rates of preterm births compared to the State average (11 per 1,000 versus 9)
- had higher rates of heart disease (210 per 100,000 compared to 176 for the State)
- had higher rates of cancer (170 per 100,000 compared to 158 for the State)
- had higher rates of respiratory disease (42 per 100,000 compared to 35 for the State)
- had higher rates of male cancer (521 per 100,000 compared to 494 for the State) including lung cancer and bladder cancer
- ranked 2nd in Pennsylvania in the rate of inpatient hospitalization with asthma– at 23 per 10,000.

Within the City of New Castle, according to the EPA EJScreen, residents:

- experience low life expectancy in the 90-100 percentile
- suffer asthma in the 90-100 percentile
- suffer heart disease in the 95-100 percentile
- suffer disabilities in the 95-100 percentile
- suffer rates of cancer in the 90-95 percentile.

Again, with the Grant, we will identify environmental threats on targeted sites, eliminate these threats through remediation, and redevelop them. For example, redeveloping **Site #1**, will eliminate the threat of asbestos exposure and add over 100 direct jobs in New Castle, impacting both asthma conditions and unemployment that contributes to stress which heightens the above health conditions.

(3) Environmental Justice (a) Identification of Issues (b) Advancing Justice The inventoried sites are located almost exclusively in the City of New Castle, a disadvantaged, low-income community. A data sample from EPA’s EJ Screen, shows our New Castle neighborhoods are in the:

- 95-100 percentile for toxic air releases
- 80-90 percentile for particulate matter
- 90-95 percentile for lead paint
- 90-95 percentile for wastewater discharge
- 80-90 percentile for hazardous waste and proximity to underground storage tanks.

Along with environmental contamination, there is also public safety risk. The 2018 crime index for the City of New Castle, as reported in www.city-data.com is 342, which is 1.2 times greater than the U.S average, higher than 87.3% of other U.S. cities. Poverty, lack of opportunity, and blight also contribute to crime via drug addiction and opioid use. In a 2017 study, Lawrence County, according to www.dea.gov, ranked sixth in the state for drug-overdose deaths.

With our Assessment Grant, we will directly address such issues as lead paint, hazardous waste and underground storage tanks through the assessment and remediation process. In addition, through our working relationships strengthened by this Assessment Grant with the PA DEP and EPA, we will also address issues of toxic air releases and wastewater discharges among the violators. We will communicate

with both PADEP and EPA to understand when release violations occur and bring it to the attention of the community, thereby advancing environmental justice in New Castle and Lawrence County.

By our reuse planning and redevelopment of these sites as described in Section 1.b., we will create jobs and economic opportunity and eliminate the blighting influences of these properties. It will also create new wealth among the elderly homeowners in the community, so they can recoup equity when they sell their home and not retire in poverty. Throughout this process, we recognize the importance of input and ownership from people living in the neighborhoods directly affected by these brownfields. As discussed, residents will become an integral part of the redevelopment through outreach and community forums.

2. b. Community Engagement (i) Project Involvement (ii) Project Roles

Name	Point of Contact	Role/Involvement
Property Owners	Various	Cooperation with LCEDC, site access, sales agreement or investment in remediation /reuse.
PA Dept of Env. Protection	Eric Gustafson, Regional Manager 814.332.6648 egustafson@state.pa.us	Review FSPs and Phase IIs, access remediation funding, Secure Act 2 Liability Release.
City of New Castle	Chris Frye, Business Manager 724.656.3510 cfrye@NewCastlePA.org	Outreach to owners, contribute to inventory and planning process and Reuse Plans.
Borough of Ellwood City	Kevin Swogger, Borough Manager 724.758.7777 kwogger@ellwoodcitybrough.org	Outreach to owners, contribute to inventory, and planning process. (in preparation likely for a future Community Wide Assessment Grant).
W.Pittsburg/Taylor Township	Joe Pauletich, Chairman 724.535.4627 [REDACTED]	Communication with owner of Site #3 -Remacor site, assist with planning process.
New Visions of Lawrence County	Angie Urban, Director 724-510-1410 [REDACTED]	CDC Director that will assist with engagement, community meetings, and provide progress reports.
Downtown Business Association	Pat Amabile, President 724.856.3347 info@shippingdepotplus.com	Association that will assist with engagement, meetings, progress reports w/ N. Castle businesses.

2.b.(iii) Incorporating Community Input It is important to not only inform, but to encourage involvement and feedback so the community understands the value of their input and develops a spirit of ownership in these efforts. The community has been involved in prior brownfield assessments and cleanup efforts in the area and was involved in the selection of this inventory. We will continue with those alliances. As the LCEDC itself is a community, based non-profit, we will also work closely with our membership throughout this process. Our Community Involvement Plan is outlined below:

- (1) Quarterly public sessions to both educate and gather feedback. Invitations will be distributed using our community partners and via public media outlets. We will also arrange an option to attend virtually. We will respond to comments received at these meetings both in person at the meeting and in writing, and will incorporate these comments into decision making on sites.
- (2) Community Visioning Events (both in-person and virtual) regarding the Reuse Plans. Using our partners and consultants, we will reach out to the residents of sites that are the focus of our Reuse Plans. Similarly, we will respond to comments received at these meetings both in person and in writing and will consider these comments in preparation of the final Reuse Plan document.
- (3) Regular, close communication with the staff and leadership with PA DEP, PA DCED, City of New Castle, and other public officials needed to support sustainable brownfield redevelopment.
- (4) Regular issuance of printed and digital marketing campaigns such as press releases, progress reports, and fact sheets to post on websites and in area newspapers.

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

3. a. Description of Tasks/Activities and Outputs (i) Project Implementation.

TASK 1 - Program Management - Cooperative Agreement Oversight and Consultant Selection.

LCEDC will establish a Steering Committee consisting of our staff and consulting team and meet monthly. Before hiring the consulting team, we will publicly solicit Qualifications in the local newspaper, rank responses according to those Qualification, and select consultants that score highest. The team will consist of a Qualified Project Manager (“QPM”) to assist with reporting & managing consultant contracts; Qualified Environmental Professionals (“QEPs”) to conduct environmental assessments; and Qualified Design Firms (“QDFs”) to develop Reuse Plans. The QEP will prepare a Quality Assurance Program Plan (“QUAPrP”) & Quality Management Plan (“QMP”).

TASK 2 -Community Engagement/Site Selection. Many of our prospective properties are already in our inventory, consequently the anticipated focus of this Task is community engagement and reuse planning. This includes meetings/communications with our Partners described above including with the community and individual site owners. We will only proceed where we have a cooperative relationship with the owner/buyer. *Please NOTE: LCEDC will assess a minimum of 5 sites.*

TASK 2(a) - Obtaining and Securing Site Access. On priority Sites, either the LCEDC or a cooperative owner will have site control, by acquisition if needed. LCEDC will communicate regularly with these owners. Our consulting team will not just identify potential environmental issues, but resolve them through Pennsylvania’s Land Recycling (“Act 2”) voluntary program. For Phase IIs environmental assessments (“ESAs”), the owner/buyer will execute the site access documents of the appropriate QEP.

TASK 2(b) - Reuse Planning. For Sites #1 &3, we anticipate developing appropriate Reuse Plans. Working with our QDFs, this would include a Market Analysis, a Reuse Vision, Resource Roadmap, and Revitalization Plan. Our goal is to generate Reuse Plans that will attract private investment and other resources. These Revitalizations Plans will include renderings and site improvements that create vision and assist in attracting leveraged resources.

TASK 3 - Phase I – On our selected Sites, our QEPs will conduct Phase I ESAs according to the All-Appropriate Inquiry Final Rule at 40 CFR Part 312. In addition, all appropriate inquiries will be conducted in compliance with ASTM E1527-13 Standards to obtain protection for our property owners and purchasers from liability under CERCLA.

Task 4 Phase II & Cleanup Plans – When our QEPs find Recognized Environmental Conditions as part of the Phase I ESA, our Steering Committee will consider Phase II ESAs. On selected Sites, the appropriate QEPs will conduct Phase II ESAs according to ASTM E1903-19. Moreover, on selected Sites, we will proceed with Cleanup Plans and where appropriate guide the project to obtain the PA. Act 2 Liability Release. Together with our consulting team, we will coordinate Cleanup Plans with appropriate Reuse Plans, working with appropriate staff at EPA, PADEP, and PA Health Department.

3.a. (ii) Anticipated Project Schedule (iii) Task/Activity Lead

Key Project Activities	Schedule	Responsibility
TASK 1 – PROGRAM MANAGEMENT		
Completion of Work Plan	Pre – Award	LCEDC
Public Ad & select QPM & QEPs	2 Month of Award	LCEDC
Prepare QUAPrP and QMP	4 Months of Award	QEP, QPM, LCEDC
ACRES & Quarterly Reports	Ongoing	LCEDC & QPM
Close-Out Report	36 months by September 2027	LCEDC & QPM
TASK 2–COM. ENGAGEMENT, SITE SELECTION, AND REUSE PLANS	Ongoing	LCEDC & Partners
Community Outreach	Ongoing	LCEDC & Partners
Site Selections	3 months of Award & Ongoing	LCEDC & Steering Committee

Reuse Plans – site selections	6 months of Award	LCEDC & Steering Committee
Reuse Plans – select QDFs	8 months of Award	LCEDC & Steering Committee
Complete Reuse Plans	9-24 months of Award	Steering Committee & QDFs
TASK 3 – PHASE I ASSESSMENTS	4 months of Award & ongoing	QEPs
Access to sites for Phase II	6 months of Award	QEPs
TASK 4 – PHASE II ASSESSMENTS/Cleanup Plans	8 months of Award & ongoing	QEPs

3(a)(iv) Outputs

We will generate outputs as we proceed with grant implementation, as follow:

- *Program Management:* 12 Quarterly Reports, ACRES Reporting/updates, Close-out report.
- *Community Engagement:* Regular meetings w/ Partners, regular site-specific neighborhood meetings by Partners.
- *Site Selection/Reuse Planning:* complete site inventory, select 10 sites, complete 2 Reuse Plans.
- *Phase I Assessments:* complete 10 Phase I ESAs.
- *Phase II ESAs and Cleanup Plans:* complete 6 Phase II ESAs, complete 3 Cleanup Plans.

3. b. Cost Estimates

LCEDC Budget Categories	Task 1 Management Reporting	Task 2 Community Inv. Selection & Reuse	Task 3 Phase I Assessment	Task 4 Phase II & Cl.-Up Plans	TOTAL
Personnel	\$17,663	\$16,062			\$33,726
Fringe	\$7,065	\$6,425			\$13,490
Travel	\$2,800				\$2,800
Equipment					\$0
Supplies					\$0
Contractual	\$36,484	\$125,000	\$50,000	\$238,500	\$449,984
Other					\$0
TOTAL Direct	\$64,012	\$147,487	\$50,000	\$238,500	\$500,000
Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total Budget	\$64,012	\$147,487	\$50,000	\$238,500	\$500,000

Note: LCEDC is forgoing the 5% administration fee, and only charging for billable hours as described.

Task 1. Program Management and Reporting. Our Chief Executive Officer (“CEO”) will oversee the management and reporting of the Assessment Grant with assistance from our Assistant Director (“AD”). Their billable rates are \$62.21/hour and \$40.30/hour respectively (plus fringe benefits of 40%), and we have budgeted them for 4 and 6 hours/month respectively for 36 months to this Task. Because they have many other responsibilities, we have also budgeted QPM consulting time of \$31,484 to assist with reporting and managing contracts and budgeted QEP consulting time of \$5,000 for completion of the QUAPrP and QMP. We also budgeted \$2,800 for travel to two EPA Brownfield Conferences ((1 attendee * (\$400 airfare + \$1,000 for 2 days lodging, food, and registration))). Our Board overseeing this grant also will provide in-kind services in reviewing Quarterly budgets and reports.

Task 2. Community Engagement/Site Selection/Reuse Planning. Our CEO will oversee Community Engagement, Site Selection and Reuse Planning with assistance from our AD and Business Outreach Specialist, whose billable rate is \$27.67/hour. We have budgeted them for 3, 3 and 5 hours/month respectively for 36 months to this Task. This includes regular communication with our Partners and public meetings. Working with our Partners and other owners is critical to our success; we have

budgeted \$25,000 of consulting time under this Task, which also includes managing the reuse planning consultants and studies. We budgeted \$100,000 for Reuse Plans on 2 select sites/areas. This will include developing Reuse Strategies and related documents such as Site Reuse Vision, and Resource Roadmap. Our Partners will attend the public meetings and their time is an in-kind contribution.

Task 3. Phase I Assessments: We anticipate selecting 10 sites for Phase I ESAs at an average cost of \$5,000. Our CEO and appropriate Partners will also review the Phase Is and their time shall be an in-kind contribution.

Task 4. Phase II Assessments & Clean-Up Plans: We anticipate selecting 6 sites for Phase II ESAs, at an average cost of approximately \$37,500 along with 3 cleanup plans at an average cost of \$4,500 per Plan. We also hope to leverage State ISRP funds when available for Phase IIs where the cost exceeds \$40,000, thus lowering the average cost to LCEDC and stretching EPA funds. Again, our CEO and Partners shall review these Phase II reports and contribute this time in-kind. *Over 50% of this Assessment Grant will be spent on Phase I & II ESAs & Cleanup Plans.*

3.c. Measuring Environmental Results Our Steering Committee will meet monthly to track each project through milestones in a timely manner. Our Executive Director will address any lack of progress through establishing team assignments and deadlines and holding team members accountable at the next monthly meeting. We will develop an Excel spreadsheet that tracks Outputs: Phase I start, Phase I completion, Field Sampling Plan (FSP) submission to EPA, FSP approval, Phase II start, Phase II completion, cleanup plan (if necessary), and Pennsylvania ACT 2 (Liability Release) Status, redevelopment start and completion. Moreover, during and after the environmental assessment process, we will also track the redevelopment effort and the “Outcome” data. We will reach out to supporting organizations, owners, and others to track such Outcomes as site development status, private investment, public investment, jobs created, blight eliminated, and reduction in public health threats. Using these tracking mechanisms, we will file timely Quarterly Reports and Property Reports using ACRES. Within the three-year grant period, we will generate the Close-Out Report and continue to track outcomes in ACRES after closing out of the Grant.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability – (i) Organizational Capacity (ii) Organizational Structure

The LCEDC is the State-Certified economic development organization for Lawrence County. We also work cooperatively and share staff with the Lawrence County Chamber of Commerce and the Lawrence County Chamber Foundation. While each organization maintains its separate legal and financial status, the merger of staff in 2017 has made us more efficient and effective. We now promote and implement a single, actionable county-wide vision. The LCEDC board is comprised of representatives from the local business, government, educational, foundation, and workforce community. The LCEDC staff have decades-long experience in successfully administering and managing state and federal grant programs. Over the last ten years, LCEDC has accessed over \$36 million in public funding from sources described in Section 1.c., leveraging over \$60 million in private investment. In addition, under contract with Lawrence County, the LCEDC has most recently managed a 2018 EPA Assessment Grant.

4.a.(iii) Description of Key Staff – Benjamin Bush is the new CEO of the LCEDC, and will have overall management responsibility for this Assessment Grant. Ben was recruited by the Board to implement Forward Lawrence, discussed in Section 1.b., the 2021 countywide economic development action plan. Ben has a Master’s in Public Administration from the Indiana University of Pennsylvania and is an Army

veteran. Diane Richardson, our AD, will assist Ben particularly with grant reporting and fiscal management. Diane has thirty years of experience in grant management, and financial recordkeeping, and has managed many of the state and federal grants received by the LCEDC or its partners. Paul Bucciarelli, our Business Outreach Specialist, will assist Ben with outreach to property owners and the community at large. Paul has several decades of experience working with small businesses and the community, most recently with the Small Business Development Center at Duquesne University and has an MBA from Youngstown State University.

4.a.(iv) Acquiring Additional Resources – Upon award, LCEDC will publicly advertise for a QPM and QEPs. All public advertisements will include the criteria for the selection of these consultants. We will then rank the responses according to each criteria, and select the consultants with the highest ranking. We anticipate selecting one QPM and three QEPs. We anticipate selecting **Sites #1&3** for Reuse Plans and will select appropriate QDFs after publicly advertising. Our Board is also responsive and will generate timely approvals of these contracts leading to rapid implementation of the Grant. As part of the selection of consultants, LCEDC will include criteria for minority business/women business (MWBE) participation and report on MWBE participation through the Federal reporting requirements.

4.b. Past Performance & Accomplishments -- ii. Has Not Received EPA Brownfield Grant but has Received Other Federal & State Assistance Agreements. (1) Purpose and Accomplishments

LCEDC has secured and managed a broad range of economic development assistance agreements over the last ten years, totaling over \$36 million. Accomplishments include:

- Secured \$5 million from the State Redevelopment Assistance Capital Program (RACP) for Steelite, a pottery and dishware maker, for construction of production facilities, leveraging \$10 million of private investment and the creation of 100 jobs. For this and the next two listed below, LCEDC managed the construction, disbursement, & reporting process to the PA. Budget Office.
- Secured \$3 million of funding from the RACP for the International Brotherhood of Electrical Workers for the construction of a new training center, leveraging \$6 million of investment.
- Secured \$1.5 million of funding from the RACP for Keystone Compliance for the expansion of their facility, leveraging another \$1.5 million.
- Manage an Enterprise Zone Revolving Fund that has loaned approximately \$1 million to six local companies in recent years, leveraging \$3.8 million of investment and secured State PIDA funding of over \$3.5 million for two companies, leveraging and additional \$3.5 million.
- Secured State Multi-modal funding of \$1 million for road and infrastructure improvements in New Castle, leveraging \$3.8 million of private investment.
- Secured funding from the ARC for the planning of the incubator/maker space on **Site #2**.

(2) Compliance with Grant Requirements.

LCEDC has met all program compliance requirements for the State and Federal funding received. We provide timely interim reports and close-out reports, and as evidence, our grant commitments continue to grow with over \$11 million secured in the last year. As mentioned, under contract with Lawrence County, LCEDC also managed a 2018 Community Wide Assessment Grant of \$200,000 and completed all reporting and close out requirements on a timely basis. We also learned a valuable lesson on the importance of a cooperative, motivated owner to the success of the Assessment Grant. We devoted much of the proceeds of the 2018 Grant to a large site (Shenango China) with significant environmental issues. As of today, we have not been able to either secure site control or cooperation from an absentee owner to reinvest in the site. Consequently, this lesson will drive our decision making on a hopeful 2024 Assessment Grant. With this Grant, we are prepared to deliver the outputs and outcomes outlined above and revitalize the urban core of New Castle and the industrial base of Lawrence County. Thank you.

THRESHOLD RESPONSE CRITERIA

1. Applicant Eligibility

The applicant, Lawrence County Economic Development Corporation (“LCEDC”), is a non-profit, tax-exempt organization certified by the Commonwealth of Pennsylvania, more specifically the PA. Industrial Development Authority (“PIDA”), as an “industrial development company” as defined by the PIDA Act of 1956. This Certification is included in the Attachments, along with our Articles of Incorporation and our IRS Tax Exemption Letter. As such, LCEDC is a Government Entity Created by the State Legislature, and is eligible for the Assessment Grant.

2. Community Involvement

(i) Project Involvement (ii) Project Roles

Name	Point of Contact	Role/Involvement
Property Owners	Various	Cooperation with LCEDC, site access, sales agreement or investment in remediation /reuse.
PA Dept of Env. Protection	Eric Gustafson, Regional Manager 814.332.6648 egustafson@state.pa.us	Review FSPs and Phase IIs, access remediation funding, Secure Act 2 Liability Release.
City of New Castle	Chris Frye, Business Manager 724.656.3510 cfrye@NewCastlePA.org	Outreach to owners, contribute to inventory and planning process and Reuse Plans.
Borough of Ellwood City	Kevin Swogger, Borough Manager 724.758.7777 kswoegger@ellwoodcitybrough.org	Outreach to owners, contribute to inventory, and planning process. (in preparation likely for a future Community Wide Assessment Grant).
Taylor Township	Joe Pauletich, Chairman 724.535.4627 [REDACTED]	Communication with owner of Site #3 - Remacor site, assist with planning process.
New Visions of Lawrence County	Angie Urban, Director 724-510-1410 [REDACTED]	CDC Director that will assist with engagement, community meetings, and provide progress reports.
Downtown Business Association	Pat Amabile, President 724.856.3347 info@shippingdepotplus.com	Association that will assist with engagement, meetings, progress reports w/ N. Castle businesses.

(iii) Incorporating Community Input It is important to not only inform, but to encourage involvement and feedback so the community understands the value of their input and develops a spirit of ownership in these efforts. The community has been involved in prior brownfield community-wide assessments and cleanup efforts in the area and was involved in the selection of this inventory. We will continue with those alliances. As the LCEDC itself is a community-based, non-profit, we will also work closely with our membership through this process. Our Community Involvement Plan is outlined below:

- (1) Quarterly public sessions to both educate and gather feedback. Invitations will be distributed using our community partners and via public media outlets. We will also arrange an option to attend virtually. We will respond to comments received at these meetings both in person at the meeting and in writing, and will incorporate these comments into decision making on sites.
- (2) Community Visioning Events (both in-person and virtual) regarding the Reuse Plans. Using our partners and consultants, we will reach out to the residents of sites that are the focus of our Reuse Plans Similarly, we will respond to comments received at these meetings both in person and in writing, and will incorporate these comments into the Reuse Plan document.

(3) Regular, close communication with the staff and leadership with PA DEP, PA DCED, City of New Castle, and other public officials needed to support sustainable brownfield assessment remediation if needed and redevelopment of priority sites and all sites selected by the Grant..

(4) Regular issuance of printed and digital marketing campaigns such as press releases, progress reports, and fact sheets to post on websites and in area newspapers.

3. Documentation of Available Balance on current Assessment Grant.

Not applicable. No current Assessment Grants or Multipurpose Grants.

4. Contractors or Subrecipients.

Not applicable. Contractors have not been procured and subrecipients have not been named.