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R05-24-C-003

NARRATIVE INFORMATION SHEET: **City of Ottawa, Illinois**

1. Applicant Identification:

City of Ottawa
City Hall
301 West Madison Street
Ottawa, Illinois 61350

2. Funding Requested:

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$2,459,639

3. Location:

- a. City: Ottawa
- b. County: LaSalle County
- c. State: Illinois

4. Property Information:

The former Peltier Glass Site (the Site) consists of three (3) polygon-shaped parcels of land encompassing approximately 1.8 acres with an approximate 61,000-square-foot, multi-unit industrial/warehouse building. According to historical records and the Phase I ESAs, the Site was occupied by a glass manufacturing company in 1891 up until the early 2000's. From 1891 to 1979 the industrial structure expanded to the current layout. Currently the site is being used as a staging area for the City of Ottawa Public Works and Streets Department. The full address for this site is:

- o 518 DeLeon Street, Ottawa, Illinois, 61350

5. Contacts:

a. Project Director: Mr. David Noble, Director of Community Development
301 West Madison Street, Ottawa, Illinois 61350
Phone: 815.433.0161
Email: dnoble@cityofottawa.org

b. Chief Executive: Mr. Robert Hasty, Mayor
 301 West Madison Street, Ottawa, Illinois 61350
 Phone: 815.433.0161
 Email: mayor@cityofottawa.org

6. Population: 18,840 (US Census, 2020)

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less	N/A
The applicant is, or will assist a federally recognized Indian tribe or United States territory	N/A
The priority brownfield site(s) is impacted by mine-scarred land	N/A
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.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The priority site(s) is in a federally designated flood plain	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy	N/A
The reuse of the priority site(s) will incorporate energy efficiency measures	N/A
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	N/A
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing	N/A

8. Letter from the State Environmental Authority:

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

9. Releasing Copies of Applications:

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

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION:

1.a. Target Area and Brownfields

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

The City of Ottawa is a community of 18,840¹ residents located in north central Illinois. Positioned at the confluence of the Illinois and Fox Rivers, Ottawa grew around the river and the silica sand deposits surrounding it. The Illinois River is an important conduit connecting Lake Michigan in Chicago to the Mississippi River. This river connection and the rail and road networks throughout Ottawa contributed to its industrial success in the past. Because of the silica sand deposits, Ottawa was an important sand and glass center for more than 100 years. However, much of this industry has left the community, leaving behind in its wake environmental contamination and blight. Ottawa was home to the Radium Dial Company (1918-1936) and Luminous Process, Inc. (1937-1978). Both companies painted watch and clock dials with luminous paints. A 1986 film documented the effects of the radioactive paint on the “radium girls” who worked in the factories painting watch dials. The women had been told the paint was safe, and in fact had been encouraged to lick their paintbrushes to sharpen them. Many suffered ill effects including anemia, bone fractures, and necrosis of the jaw. Many died young. In 1985, the Illinois Department of Nuclear Safety dismantled the Luminous Process building. During that work, they learned that radioactive waste had been used as fill material throughout the Ottawa area. The Ottawa Radiation Sites are still active on the EPA’s National Priority List (ILD980606750)². Ottawa understands that NPL sites are not eligible for brownfields funding, but wanted to note that these facilities were located in the Target Area of this application to illustrate the challenges and impacts that brownfields have made on the City. Former glass production and radium watch dial factories are not the only environmental challenges facing Ottawa. The community is significantly affected by brownfield sites ranging from coal gasification plants to filling stations to railroad sites and more. Ottawa’s initial 2006 brownfields inventory included over 200 sites – this is an overwhelming number for a small city. A large share of these brownfields are disproportionately threatening the health and economic well-being of sensitive populations. Previous assessment funds have helped position a number of sites for cleanup and redevelopment; however, the City is now seeking cleanup grant funding to enable Ottawa to continue their brownfield work and perform remediation activities that will eliminate threats to human health and the environment from the site’s environmental condition, revitalize an underutilized area, stimulate private investment, and create local jobs.

Ottawa’s target area for this cleanup grant project is the Downtown and Marquette District (DMD Target Area). The DMD Target Area starts at the Illinois riverfront, leads through the downtown and some residential neighborhoods, before ending at the commercial/industrial Marquette Street. The DMD Target Area contains two disadvantaged Census Tracts: 17099962600 and 17-99962700³. This cleanup grant will address the impacts and challenges the City is facing due to brownfields, position a priority site for economic redevelopment, and eliminate health and safety threats the adjacent neighborhoods are experiencing due to brownfields. Although there are a number of brownfield-impacted areas in Ottawa, the City has selected the Downtown and Marquette District (DMD) as the targeted area of this application for the following reasons:

- The DMD Target Area has the highest concentration of brownfields in the community. In fact, 76% of the brownfield sites identified in the *Ottawa Brownfields Redevelopment Prioritization Strategy* are located in the DMD Target Area. Fourteen of the top fifteen high priority sites – and 28 of the top 30 – are located within the boundaries of the proposed target area.
- Ottawa is experiencing a new trend of inner-city flight, where residents are selling their downtown residences due to their lower value and higher tax rates to buy houses in a more rural district, which they hope to put a stop to with their brownfield reuse strategies. Inner-city flight is most detrimental to downtown students and schools. When people leave the downtown, they are effectively making school districts that are already struggling more poor.
- The adjacent neighborhoods and census tracts to the DMD Target Area include some of the City’s most economically-distressed areas, thus the disadvantaged Census Tract designations, which stand to gain the most from new employment opportunities in the DMD. In fact,

¹ US Census 2020 <https://www.census.gov/quickfacts/ottawacityillinois>

² National Priorities narrative for this site available at <http://semspub.epa.gov/work/05/633417.pdf>.

³ Climate and Economic Justice Screening Tool (CEJST) - <https://screeningtool.geoplatform.gov/en/#13.48/41.34813/-88.84161>

downtown on the waterfront, neighborhoods contain populations that range between 79% and 87% low-to-moderate income status⁴.

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

The former Peltier Glass Site (the Site) consists of three (3) polygon-shaped parcels of land encompassing approximately 1.8 acres with an approximate 61,000-square-foot, multi-unit industrial/warehouse building. According to historical records and the Phase I ESAs, the Site was occupied by a glass manufacturing company in 1891 up until the early 2000's. From 1891 to 1979 the industrial structure expanded to the current layout. Currently the site is being used as a staging area for the City of Ottawa Public Works and Streets Department. Structures have been added on to the original glass factory building over the years, leaving multiple floor levels and significant deterioration in the oldest portions of the building. The remaining grounds consist of gravel-covered parking lot surrounding and graveled egress and ingress areas off Boyce Lane and Chestnut Street. Landscaped areas are located along the northern and southeastern exterior of the Site. Three (3) parcels make up the Site as PINs 21-02-305-019, 18-02-331-002, and 18-02-331-006. Multiple environmental assessments have been completed at the Site, including an initial Phase I ESA in 2011, a Phase II ESA in 2013, and a second Phase I ESA was completed in 2014 in preparation for site acquisition by the City of Ottawa. Phase I Environmental Site Assessments (ESAs) completed at the Site in 2011 and 2014 identified recognized environmental conditions (RECs) associated with historical glass manufacturing operations conducted on the Site, above ground storage tanks, underground storage tanks, chemical spills, and non-native fill material placement. An initial Phase II ESA was completed in 2013 to determine if contaminants of concern (COC) were present in the subsurface outside of and beneath the building. The 2013 Phase II ESA identified elevated concentrations of SVOC, VOC, and heavy metals (specifically antimony, arsenic, cadmium, chromium, lead, and selenium) contaminants in soil and groundwater from former glass manufacturing operations. Contaminant concentrations were identified above Illinois Environmental Protection Agency (Illinois EPA) Tiered Approach to Corrective Action Objectives (TACO) Tier 1 remediation objectives. U.S. Environmental Protection Agency-led Time Critical Removal actions were completed to address contaminated soils along the exterior of the Site. While most of the exterior soil contamination was addressed through Time Critical Removal action, residual contamination remains under the footprint of the building. Based on the findings of the environmental investigations, the contamination in soil and groundwater directly impacts the Site and any future redevelopment of the Site. As a result, remediation action will be necessary to protect human health and the environment and improve the Site for productive reuse.

1.b. Revitalization of the Target Area

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

The specific reuse strategy and revitalization plan for the former Peltier Glass site is layered, including plans for: mixed-use developments that combine housing and recreational use; greens space development; and the continued use of the site for the Public Works and Streets Department of the City of Ottawa. The City of Ottawa's brownfields program will continue to be led by the "Ottawa Brownfields Redevelopment Prioritization Strategy", which was completed in 2006, but has been updated as the City works on brownfields related projects. To date, the City of Ottawa has conducted assessment or remediation work on 45 properties, 30 of which were listed on the City's Priority site list. Ottawa also utilizes their Downtown Plan and Comprehensive Plan for brownfields redevelopment strategizing. The City's 2014 Comprehensive Plan, which won the Daniel Burnham Award for the Best Comprehensive Plan in the State of Illinois, will also be consulted for revitalization strategies. The City completed detailed sub-area plans of the DMD Target Area in its *2014 Comprehensive Plan*, which was developed using an inclusive community engagement process that elicited a tremendous amount of public input on redevelopment in the DMD, including ideas for major public anchors (amphitheater, harbor and marina, botanical gardens); mixed use redevelopment; hotel and banquet facility; community center; boardwalk; and re-watering of portions of the I&M Canal (which is now half-complete). These plans include the redevelopment of the former Peltier Glass site, which will require remediation prior to any site reuse. Cleanup of the identified soil and groundwater contamination is a critical component to redevelopment, specifically to protect sensitive human receptors at and surrounding the Site. The City of Ottawa will enroll the Site into the Illinois Environmental Protection Agency (Illinois EPA)

⁴ HUD LMI Mapping Tool: <https://www.arcgis.com/apps/webappviewer/index.html?id=ffd0597e8af24f88b501b7e7f326bedd>

Site Remediation Program (SRP). Given the proximity of the former glass manufacturing facility to neighborhoods and residences, more stringent residential reuse standards are proposed for the cleanup effort. Given the nature of remedial injections and/or soil blending, the structure and concrete foundation elements may need to be removed to address the subsurface soil and groundwater contamination.

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

Brownfields redevelopment is crucial to Ottawa's economic growth. Although the City's business incentives will help attract development, the use of Brownfields grant funds will further position environmentally challenged properties for redevelopment and reuse. Redeveloping this site will improve the neighborhood and bring residential and recreational value to local residents, which in turn will bring investors and developers to the City, eager to purchase and redevelop remediated property. Brownfields redevelopment investment in the City will create hundreds of jobs and improve the overall economic quality of the city. Much of the housing stock in the City, particularly in the DMD Target Area where the majority of sensitive populations live, are on the lower end of the home value scale. The only draw to this area now is the lower cost housing, not the quality of life for the immediate area. Ottawa aims to have the housing in the target area, and potentially on the former Peltier Glass site, become desirable not just for the cost, but for the proximity to well-planned and vibrant development that will provide residents with the services they desire and need in walking distance from their homes. As brownfields are redeveloped with mixed-uses, the City will attract residents from surrounding communities, increasing the City's population and diversifying its workforce, rendering it less vulnerable to economic swings like they experienced in the past. If awarded, these cleanup grant funds will also facilitate the development of recreational and public use of the Peltier Glass site.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Characterization

If the proposed cleanup site needs additional assessment or site characterization work, Ottawa will use its current assessment grant and work with its community partners for the opportunity to utilize their additional funds to complete any additional assessment work. The City of Ottawa has demonstrated tremendous commitment and capacity to leverage funding from multiple private and public (Federal, State and local) sources to advance redevelopment projects after they received previous brownfields funding. If additional funds are needed for site characterization, the City will make it happen.

1.c.ii. Resources Needed for Site Remediation

The former Peltier Glass site is a large-scale demolition and redevelopment plan for a significantly blighted, former industrial property in one of the most disadvantaged areas in the City of Ottawa. The 1.8-acre site has been abandoned and underutilized for several years, and has become a significant challenge for the surrounding neighborhood. Ottawa has secured acquisition of the site and is now coordinating the remediation, demolition, and redevelopment of the site for the benefit of the neighborhood and the City. The full remediation of the Peltier Glass site project is anticipated to take five years to complete and will cost millions of dollars in total. Ottawa will seek funding assistance from state and federal agencies including US EPA Brownfields Program, IEPA Municipal Brownfields Program, Illinois Department of Commerce & Economic Opportunity (DCEO) through the Rebuild Illinois program, US EDA, and US HUD. Ottawa will also tap into local resources like TIF financing, Enterprise Zone benefits, Opportunity Zone benefits, and CDBG funding.

1.c.iii. Resources Needed for Site Reuse

The 1.8-acre Peltier Glass site will take years and millions of dollars to move the site towards its eventual reuse strategy. Once site remediation is complete, Ottawa will tap into the following resources to help prepare the site for its future redevelopment: DCEO CDBG funding, US EDA Public Infrastructure funding, private investment dollars, local lending dollars, and project donation dollars.

1.c.iv. Use of Existing Infrastructure

The former Peltier Glass site is located in an area already served with existing infrastructure – rather than greenfield development at the edge of the community which would necessitate extension of physical infrastructure and City services beyond existing boundaries. Ottawa's

existing infrastructure for adapting existing building structures on-site for redevelopment includes parking lots/facilities, site access roads, local roads, sidewalks, curb and gutters, water, sewer, gas, and electricity infrastructure. The City's Brownfields Initiative calls for adaptively reusing existing buildings over new construction, which both preserves historic architectural treasures in our community and reduces construction waste and demolition disposal – the planned reuse plans will incorporate as much adaptive reuse of the building as they can. New infrastructure may be required for broadband capabilities or any energy efficiency installations like solar power, as they do not currently exist at the site. If broadband or renewable energy components are needed, the City will work with the developer to assist in the financing of these infrastructure needs.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

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

Ottawa is a small community with limited resources to draw on to deal with the more than 200 brownfields located in the community. Ottawa has repeatedly demonstrated its willingness to contribute local funds to brownfields assessment and other revitalization efforts; however, the sheer volume of brownfields in the City makes it necessary to seek assistance through the US EPA brownfields program. Ottawa's median household income is 23%⁵ lower than the State of Illinois and Ottawa's Poverty Rate is 15.6%, compared to 11.9% for the State of Illinois. These economic factors impact the City's tax base and ability to generate revenue, causing increasing pressures on the corporate fund. Despite budget pressures, the City must continue to provide for public safety, infrastructure and the basic elements of municipal services, making US EPA brownfields funding even more essential. In 2008, areas of Ottawa along the Fox and Illinois Rivers were heavily damaged by Hurricane Ike. In fact, the Central School site, a former priority brownfield site for the City, was so devastated by the flooding that the local school district abandoned the building and built a new school in a different location. The City of Ottawa received Ike Disaster Recovery funds in 2013 and were able to acquire the Central School property and demolish the structure on it, but other areas damaged were not able to be redeveloped like the Central School site. On February 28, 2017, the City of Ottawa was hit by a massive tornado, causing \$60 Million in damages. The only funding assistance the City received was approximately \$500,000 to repair some streets.

The former Peltier Glass site's surrounding neighborhoods are among the most severely impoverished in Ottawa. Ottawa's DMD Target Area includes two disadvantaged Census Tracts: 17099962600 and 17099962700. To have these designations, the site location generally represents economically distressed communities that are in need of investment and revitalization. The former Peltier Glass site is located in the first listed Census Tract, with a population of 5,675 and 21% of that population comprised of minority residents (12% Hispanic/Latino, 3% Black/African American, and 2% Asian). 15% of this census tract's population is children under the age of 10, and 18% of the population is elderly over the age of 65. The low income percentile for this census tract is 67, the low median income percentile is 76, the poverty percentile is 74, the unemployment percentile is 70, and 13% of this tract's population has an education that is less than that of a High School Diploma. The second disadvantaged Census Tract in the Target Area is 17099967200. This tract has a population of 2,223, with 30% of the population comprised of minority residents (25% Hispanic/Latino), 18% of the census tract's population is elderly over the age of 65, and 10% of this tract's population is children under the age of 10. The low income percentile for this census tract is 85, the low median income percentile is 92, the poverty percentile is 81, the unemployment percentile is 97, and 13% of this tract's population has an education that is less than that of a High School Diploma.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

In the Target Area, the income differential compared to the City as a whole and the State is great –with a median household income of just 54% of the State of Illinois median household income. In addition, low-to-moderate-income rates reach 80% in the downtown neighborhoods. The target area is located in an area of the City with some of the highest levels of poverty (up to 25%, and up to 35% for women in poverty); people who do not speak English well; high minority populations;

⁵ US Census 2020, www.census.gov

and adults with lower levels of educational attainment³. Some of Ottawa's most vulnerable populations live within this area that is highly concentrated with brownfields. By addressing the environmental contaminant issues in the Target Area with these grant funds, any threat of exposure by nearby sensitive populations to contaminants via direct contact, inhalation, vapor intrusion or ingestion will be eliminated.

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

Census Tract 17099962600, where the Peltier Glass site is located, has higher than normal percentiles for the following adverse health conditions: Asthma – 60, Diabetes – 75, Heart Disease – 82, and Low Life Expectancy – 74. Census Tract 17009962700 has higher than normal percentiles for the following adverse health conditions: Asthma – 56, Diabetes – 73, Heart Disease – 81, and Low Life Expectancy – 71⁶. According to US EPA's EJSCREEN tool⁷, due to Ottawa's industrial and manufacturing history, the downtown and target area neighborhoods are located in a higher cancer risk percentile than other areas of the City. The types of site contaminants associated with the priority sites are known carcinogens, and the suite of other health effects associated with chronic exposure to the contaminants listed include respiratory problems, developmental delay, central nervous system effects, and reproductive system effects⁸. Residents located within close proximity to the priority project sites are potentially exposed to potential site contaminants through dermal contact, ingestion, particulate inhalation, and vapor migrations. The following statistics are specifically localized occurrences in the project's Target Areas:

- LaSalle County has a much higher mortality rate from cancer and chronic lower respiratory disease than Illinois as a whole. The LaSalle County cancer mortality rate of 472.59 per 100,000 is 32.6% higher than the State rate of 356.3/100,000. The LaSalle County chronic lower respiratory disease mortality rate of 110.84/100,000 is 42.7% higher than the State rate of 77.66%⁶
- LaSalle County's incidence of children with elevated lead levels was 73.4% higher than the Illinois rate in 2012 and through today, according to the Illinois Department of Public Health⁹. Lead is a known or potential contaminant in several sites throughout the City, but especially in the DMD Target Area.

These grant funds will help address the environmental contaminant issues in the Target Area and at the Peltier Glass Cleanup site by performing remediation activities that will eliminate threats of exposure by nearby sensitive populations to contaminants via direct contact, inhalation, vapor intrusion or ingestion and exasperating these existing health conditions.

(3) Environmental Justice

(a) Identification of Environmental Justice:

The Climate & Economic Justice Screening Tool showed some dire statistics for the Cleanup Site's disadvantaged Census Tract, which features the following environmental justice issues¹⁰:

- Census Tract is designated as a Disadvantaged Area
- Proximity to Superfund Site is in the 97th percentile
- Wastewater Discharge is in the 90th percentile, meaning that modeled toxic concentrations at parts of streams is located within 500 meters
- Census Tract has a Low-Income percentile of 67, which means that household incomes in the area are equal to or twice the federal poverty level
- Houses with lead paint in the Census Tract is in the 53rd percentile
- Unemployment in the Census Tract is in the 70th percentile
- Poverty in the Census Tract is in the 74th percentile
- 13% of people ages 25+ have an education level that is less than a High School Diploma

(b) Advancing Environmental Justice:

The former Peltier Glass Site's surrounding neighborhoods are among the most severely impoverished in Ottawa. The City's cleanup efforts are directly confronting the problem that impoverished communities are more likely to suffer from a lack of clean water and air and a lack

⁶ CEJST - <https://screeningtool.geoplatform.gov/en/#13.48/41.34813/-88.84161>

⁷ <http://ejscreen.epa.gov/mapper>

⁸ Source: Center for Disease Control ATSDR ToxFAQ sheets

⁹ Illinois Department of Public Health, available at http://www.idph.state.il.us/envhealth/pdf/Lead_Surv_Rpt_12.pdf

¹⁰ Climate & Economic Justice Screening Tool - <https://screeningtool.geoplatform.gov/en/#12.07/39.87047/-88.91381>

of safe housing. These conditions are often the direct result of industrial facilities' frequent proximity to low-income neighborhoods. Removal of portions of the existing structures and redevelopment of the site into a productive end-use will provide the area with significantly greater public safety, health, environmental health, social justice, and economic development benefits. Due to these statistics above, throughout their remediation efforts, the Ottawa Brownfields team will work to educate stakeholders on the importance of integrating principles of environmental justice and equitable development into the cleanup and redevelopment of the cleanup site, including: ensuring equitable access to amenities such as health clinics and grocery stores, working with minority- and women-owned businesses, ensuring jobs with living wages, partnering with community-based organizations and neighborhood leaders to enhance the understanding of environmental and health-related issues at the community level, creating commercial linkage strategies, and reusing brownfield sites for greenspace and other healthy, safe and walkable areas for the cleanup site. Ottawa will also work to provide accessible and culturally appropriate opportunities for low-income, minority and linguistically isolated stakeholders to meaningfully participate in decision-making processes on the proposed brownfield cleanup. These principles help to ensure that low-income and minority residents in the project area, which has historically consisted of blighted properties and perceived or known environmental contamination, reap the benefits of this environmental cleanup project.

2.b. Community Engagement

2.b.i. Project Involvement

The City of Ottawa has been fortunate to have a number of community organizations actively engaged in promoting and supporting brownfields redevelopment efforts in the community.

2.b.ii. Project Roles

Project Partner Name	Point of Contact	Specific Role in the Project
Ottawa Area Chamber of Commerce	Julia Petterson, Membership Director Phone: 815-433-0084; Email: J.Petterson@ottawachamberillinois.com	Assist with Community Outreach efforts and help identify/locate developers for the Peltier Glass site.
North Central Illinois Economic Development	Gina Czubachowski, Sites Manager Phone: 815-712-0164 Email: gina@edcNCL.org	Help identify and locate industrial development and redevelopment opportunities at the Peltier Glass site.
North Central Illinois Council of Governments	Kevin Lindeman, CEO Phone: 815-433-5830 Email: klindeman@ncicg.org	Assist in identifying new funding avenues to attract new development and redevelopment at the Peltier Glass site.
Ottawa Industrial Development Corporation	Bill Franklin, President Phone: 815-228-2335 Email: wfranklin@freqdev.com	Provide low-interest gap loans for new development/redevelopment at the Peltier Glass site.
Upper Illinois River Valley Community Development Corp.	John McCormick, President Phone: 815-223-0700 Email: johnm@eurekasavings.com	Provide low-interest gap loans for new development/redevelopment at the Peltier Glass site.
Ottawa Downtown Business Association	Cassie Skoflanc Phone: 815-481-1389; Email: [REDACTED]	Represent concerns of downtown businesses, promote activities to grow business in/around the Peltier Glass site.

2.b.iii. Incorporating Community Input

Since the inception of the City's Brownfields Program, Ottawa has strived to involve the community in a meaningful way. In fact, in 2014, Ottawa hosted community meetings coordinated by Kansas State University to involve the community in reuse planning for the City's Peltier Site, which is a major brownfield site in Ottawa and the subject of this cleanup grant. In the most recent engagement activities, the City has held public presentations, updating the community on the status of their brownfields program and the work that it has done to date to benefit redevelopment in Ottawa. Moving forward, the City of Ottawa will work with their Community Partners to continue communication with the targeted community, including neighborhood organizations, citizens groups, property owners, lenders, business organizations and developers in the development and implementation of the brownfields program. Any concerned citizens or business owners will have the opportunity to express their concerns, identify their needs, and participate in the brownfields project as stakeholders. Since this proposal is site specific to the Peltier Glass site, Ottawa's outreach efforts also will have an extra emphasis on reaching members of the Target Area most directly affected by the site. Ottawa is committed to using diverse notification methods to ensure

that our efforts reach a broad audience. The City also is committed to ensuring that our outreach efforts describe project activities and progress in ways that are easily understood by residents who will most likely be unfamiliar with environmental and scientific terminology. In addition, translation services will be provided by those in our community who do not speak English. There will be 3 Community Meetings and 3 Fact Sheets throughout the project period. Ottawa will ensure that directly affected residents and neighborhoods are well informed and have an opportunity to have questions and concerns addressed as remediation activities take place, and have input into reuse planning for sites in their neighborhoods. Ottawa will seek out the expertise of the LaSalle County Health Department to assist at community meetings to ensure that public health and welfare issues are adequately addressed.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The proposed cleanup plan is based on the Analysis of Brownfield Cleanup Alternatives (ABCA) prepared for activities associated with the remediation of the Former Peltier Glass site located at 518-524 Deleon Street in Ottawa, Illinois. The tasks and activities described below are eligible uses of funds and are specifically designed to be effectively completed within the four-year period of performance. The proposed cleanup plan is as follows:

Asbestos Abatement, Building Demolition, Concrete Foundation Removal, and In-Situ Soil Blending: This cleanup alternative is anticipated to be the most effective in reducing the impact of the contamination from the former glass manufacturing facility at the Site and improving the overall health and safety of the area. By removing the deteriorated portions of the structure, concrete pad and footing, in-situ remediation blending of the soil to a depth of 10 feet will prove to be the most effective method to reduce waste being generated from the Site. This alternative reduces the source of soil to groundwater migration of contaminants through the Site. This cleanup alternative allows for the Site to be redeveloped into residential and/or recreational use.

3.b. Description of Tasks/Activities and Outputs

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

Task 2: Community Involvement	
i.	Project Implementation: This task includes cooperation between the City staff, QEP, and Project Partners to implement the community involvement plan to inform residents, property owners, and the public about the status of the project. This task also includes website updates and printed public information materials as needed. Public comments, questions, and concerns will be addressed under this task. QEP will also prepare a Reuse and Redevelopment Plan for the site for City and public comment to guide future reuse.
ii.	Anticipated Schedule: This task will commence immediately upon project award, and will continue throughout the entire four-year project period.
iii.	Task/Activity Lead: This task will be led by the City’s Brownfields Project Manager, Dave Noble, with assistance from the selected Qualified Environmental Professional and Project Partners.

iv. Outputs: 3 Public Meetings and Meeting Minutes, 3 Website Updates, 3 Fact Sheets, Reuse and Development Plans established for site.

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

Task 4: Cleanup Activities	
i. Project Implementation:	This task includes the cleanup work, including asbestos abatement, demolition of ~11,300 ft ² of deteriorated building, replacement/stabilization of remaining walls, removal of foundational elements in demo area, in situ soil blending, and engineered barrier installation. Remediation will be followed with confirmation sampling and final reporting and cleanup documentation by the QEP.
ii. Anticipated Schedule:	This task will commence after the first year in the project period, and will continue until project closeout.
iii. Task/Activity Lead:	This task will be led by the Qualified Environmental Professional.
iv. Outputs:	Pre-Construction Meeting/Minutes, asbestos abatement, partial building demolition and stabilization, partial foundation removal, in situ soil blending with remediation reagents, confirmation soil sampling with lab reports, a final cleanup report, 1.8 acres of land remediated.

3. c. Cost Estimates

Budget Categories		Project Tasks				TOTAL
		<u>Task 1:</u> Program Management	<u>Task 2:</u> Community Involvement	<u>Task 3:</u> Cleanup Planning	<u>Task 4:</u> Cleanup Activities	
Direct Costs	Personnel					
	Fringe Benefits					
	Travel	\$2,500				\$2,500
	Equipment					
	Supplies					
	Contractual	\$8,625	\$28,975	\$138,375	\$2,281,164	\$2,457,139
	Other					
Total Direct Costs		\$11,125	\$28,975	\$138,375	\$2,281,164	\$2,459,639
Total Federal Funding		\$11,125	\$28,975	\$138,375	\$2,281,164	\$2,459,639
Total Budget		\$11,125	\$28,975	\$138,375	\$2,281,164	\$2,459,639
<p>Task 1: This budget includes \$2,500 is for two (2) City Staff to attend a National Brownfield Conference (Airfare at \$400 each, Lodging at \$175 per day, Meals and Expenses \$325 per person). Contractual work is intended for the QEP to provide backup documentation and support to the City in program management (69 hours at \$125/hour = \$5,625).</p> <p>Task 2: This budget includes \$28,975 in contractual work for development of Fact Sheets, Website updates, and conducting Public Meetings and Public Engagement in addition to developing a reuse plan (232 hours of Qualified Environmental Professional at \$125/hour = \$28,975).</p>						

Task 3: The \$138,375 Contractual Budget will be for the development of the HASP, QAPP, finalization of the ABCA, bench scale testing, Plans & Specs and permitting for the project, architectural planning for building stabilization, and assistance with bidding. At \$125/hour, this will provide 1,107 hours of QEP consultant time for this task.

Task 4: The \$2,281,164 Contractual Budget is separated into procured asbestos abatement, partial building demolition, building stabilization, partial foundation removal, remedial in situ soil blending, and installation of engineered barriers (\$2,149,987), QEP oversight during remediation (\$49,552), Confirmation Sampling and Analysis (\$45,554), and final reporting for the QEP (\$36,101). The amount of time for the remediation is subject to the procured cleanup contractor availability but is expected to be complete within 2 years following procurement. Subsequent confirmation sampling and final reporting to follow.

3.d. Plan to Measure and Evaluate Environmental Progress and Results

To ensure that the City of Ottawa achieves the intended results of the Cleanup Grant and completes the outputs of each task listed above, Ottawa will carefully track, measure, and report project performance through annual reports, quarterly reports, ACRES reporting, and with the implementation of Ottawa's Community Involvement Plan. Quarterly and Annual Reports will cover project progress, any difficulties encountered, a record of financial expenditures, data results, and anticipated further actions. Specific accomplishments, contaminants found, which materials were impacted, and resources required to leverage and complete the planned reuse will all be reported on, and will be posted to the City website to keep their community involved on the status of the project. This site will be entered into the ACRES database, which will also be utilized to track job creation and acres of land assessed as part of this grant project. Anticipated quantifiable outcomes from this project include the number of acres of land remediated and the square footage of abatement completed, while other outcomes include liability protection for the site owner, removal of blight, reduction or elimination of future contaminant exposure, improving community health, and the return of the site to a productive mixed use. Periodic meetings with the QEP and the Cleanup Contractor will take place to ensure deadlines and milestones are being met - corrective actions like liquidated damages will go into effect if the project deadlines and milestones are not being met.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Structure, 4.a.ii. Description of Key Staff

The City of Ottawa, led by the Economic and Community Development Director, Mr. David Noble and a Qualified Environmental Professional (QEP), will continue to progress their brownfields program to support the remediation, and redevelopment/reuse of brownfields. Noble has successfully led Ottawa's brownfields program for seventeen years. City staff will serve on the Brownfields Redevelopment Advisory Committee. The City has extensive experience facilitating and managing redevelopment projects and will utilize that experience to support the most strategic use of the assessment grant funds. Mr. David Noble and the selected QEP will be responsible for day-to-day grant operations including: project tracking, reporting, procurement of contractual services, and managing/tracking all financial transactions. Upon award of the cooperative agreement, City staff will prepare a draft Work Plan. After the US EPA approves the work plan, the City will retain the QEP in compliance with all applicable federal and local procurement requirements. The QEP will assist with grant and program management and will complete remediation plans, assist with hiring of a contractor to complete the remediation work, and participate in program development, project reporting, and community engagement activities. The City will work with Illinois EPA's Voluntary Site Remediation Program to provide independent oversight of remediation activities conducted under this program, to ensure all cleanup activities are conducted appropriately and with consideration for public health and welfare.

Mr. David Noble, the City's Economic & Community Development Director, is now serving in his 17th year with the City of Ottawa and is very committed to the City's brownfields program. As the Economic Development Director, he manages a division charged with administering the planning, sustainability, neighborhood revitalization efforts, neighborhood and building renovation functions of the City, and with managing economic and urban development efforts, in addition to the City's Brownfields efforts. As the Economic Development Director, he is part of an executive team that manages the day-to-day operations for a municipal government of more than 18,000 residents with an annual budget of over \$45 million. The City will follow EPA's

procurement policies to hire a Qualified Environmental Consultant (QEC) to effectively and efficiently manage the City’s cleanup grant project.

4.a.iii. Acquiring Additional Resources

The City of Ottawa will identify, coordinate and leverage any public and private resources needed to complete the described grant tasks. Ottawa has not had any trouble in the past in procuring a capable QEP, and does not foresee issues for this grant project. Project Partners will assist in providing supplies for community outreach activities, and the City will provide in-kind time for extensive GIS mapping, as the information will be an asset to the City as well.

4.b. Past Performance and Accomplishments

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

The City of Ottawa has been awarded four previous Brownfields Assessment grants (2008, 2012, 2014, and 2022). With those funds, Ottawa has implemented a very successful Brownfields Program, positively impacting 277.46 acres (per ACRES database, which is up to date) of land throughout the City. Ottawa has conducted Phase I Environmental Site Assessments (ESA) on 37 sites; Phase II ESAs on 15 sites; cleanup and reuse planning on 7 sites; cooperated with US EPA on private cleanup actions on 2 sites; successfully leveraged millions of private and public funding, turning blighted properties into successful end-uses ranging from a community college campus to park space, and festival grounds to senior housing, restaurants and a market. The list below illustrates \$65.5M in investments that were made possible by the City’s brownfields funding:

Investment	Property	End Use
\$1.6M	Illinois Valley Community College	Ottawa Satellite Campus
\$30+ M	Downtown Waterfront	NFR Received – Utilities Cleaned Up
\$24M	DTW Property – Former MGP site	New YMCA Facility
\$2M	Jordan Block	City Park & Festival Space
\$2M	Little City Building	Mixed Retail/Residential Space
\$500k	620 Court	Court Street Pub; Residential Upstairs
\$300k	622-624 Court	Residential Development - Downtown
\$200k	1206 Fulton	Abandoned Industrial Building – Sold & Repurposed
\$500k	205-207 W. Main Street	Downtown Commercial Property Demolished; New Building in the Works
\$1M	Ottawa River Rescue/Feece Oil	New Facility on former Bulk Oil Plant
\$200k	Gaul Property	Demolished Building; Hollywood Park Playground
\$250k	220 W. Main Street	Rehab of Commercial Building near former Dry Cleaners
\$300k	Former Gas Station	Ottawa Visitor’s Center
\$1.650M	909 Clinton – Jim’s Formal Wear	“Eyesite” Doctor’s Office / Justice Law Center
\$10M	300 W. Madison – Anthony Place	54 Low-Income, Senior Apartments
\$2M	1794 Chessie Lane	NCAT Transit Building
\$65,500,000 in TOTAL BROWNFIELD-RELATED INVESTMENTS MADE		

(2) Compliance with Grant Requirements

Ottawa’s previous grant projects have finished on time, on budget, expended all grant funds, and in a way that fulfilled planned outputs/outcomes while adhering to the Cooperative Agreement. The City has a strong administrative staff with a history of managing a mix of state and federal grant programs who provide any and all necessary support in administration of grants.

THRESHOLD CRITERIA:

1. Applicant Eligibility:

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

2. Previously Awarded Cleanup Grants:

The proposed cleanup site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds:

Not Applicable. The City of Ottawa has not been a recipient of a Multipurpose Grant.

4. Site Ownership:

The City of Ottawa is the sole owner of the proposed cleanup grant site, acquired by the City on December 5, 2014.

5. Basic Site Information:

- (a) Site name: Former Peltier Glass Factory
- (b) Address: 518-524 Deleon Street Ottawa, IL 61350 (3 parcels)
- (c) Current Owner: City of Ottawa, Illinois

6. Status & History of Contamination at the Site:

(a) Contamination: VOCs, SVOCs, and metals (antimony, arsenic, cadmium, chromium, lead, selenium) have been identified in soil and groundwater above the Illinois EPA Tiered Approach to Corrective Action Objectives (TACO) Tier 1 remediation objectives.

(b) Operational History & Current Use of Site: The Site buildings were constructed in approximately 1891. According to historical records and environmental assessments, the Site was occupied by glass manufacturing company between as early as 1891 up until the early 2000's. Following City acquisition, the Site building has been partially used as a staging area for the City of Ottawa Public Works and Police Department. The southeast corner of the building is in highly deteriorated condition and has not been utilized by the City of Ottawa since acquisition in 2014.

(c) Environmental Concerns: Assessment activities conducted on the Site in 2012 and 2013 confirmed that historical glass manufacturing operations, former UST and AST fuel storage systems, onsite disposal of process wastes, and a historical fire event had negatively impacted the soil and groundwater at the Site. The soil on the adjacent right-of-ways to the north and west of the Site were also impacted. Analytical sampling identified characteristically hazardous concentrations of metals in exposed, near-surface soils and beneath the concrete foundation slab of the building. Contaminants of concern include Antimony, Arsenic, Cadmium, Chromium, Lead, Selenium, 2-Methylnaphthalene, and Naphthalene.

The contamination directly impacts the Tiered Approach to Corrective Action Objectives (TACO) soil inhalation and ingestion exposure routes and groundwater ingestion exposure. As a result, soil and groundwater contamination remediation will be necessary to protect human health and the environment and will prepare the Site for future redevelopment.

(d) Source of Contamination and Nature and Extent of Contamination:

Based on assessment work, documented contamination in soil and groundwater is directly related to former glass manufacturing operations. Soil contamination has been identified primarily in shallow soils around and beneath the slab of the building. Residual volatile and semi-volatile petroleum contaminants have been identified in soil and groundwater adjacent to former orphan underground storage tank locations.

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

8. Environmental Assessment Required for Cleanup Grant Applications:

A Phase I ESA was completed by the City of Ottawa on October 17, 2011, to evaluate the presence of Recognized Environmental Conditions (RECs) related to the Site and surrounding properties. The Phase I ESA identified multiple RECs related to former glass manufacturing company operations. A Phase II ESA was completed by the City of Ottawa on February 19, 2013, to evaluate the presence of glass manufacturing contamination at the Site. In preparation for site acquisition, an additional Phase I ESA was completed by the City of Ottawa on November 14, 2014.

9. Site Characterization:

Per Illinois EPA's Acknowledgment Letter on November 9, 2023, which is included in this application submittal, the Illinois EPA states: "The City of Ottawa grant will be a Cleanup Grant for Hazardous Substances and will be used on the former Peltier Glass Factory site located at 518-524 Deleon Street Ottawa, IL 61350. The site is not currently enrolled in the State of Illinois Site Remediation Program but is eligible for the program. Based on the current information, there is a sufficient level of site characterization."

10. Enforcement or Other Actions: The City has owned the Site since 2014. No known enforcement or other actions have been identified during City ownership. A federally-led Time Critical Removal action was completed in 2013; however, the enforcement was completed as 'Removal Only' by the U.S. EPA.

11. Sites Requiring a Property-Specific Determination:

The Peltier Glass Factory does not require a property-specific determination based on review Section 1.5 in the Information on Sites Eligible for Brownfields Funding under CERCLA 104(k) of the FY23 Guidelines for Brownfield Cleanup Grants.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

a.) Property Ownership Eligibility – Hazardous Substances Sites

(iii) (1) Landowner Protections from CERCLA Liability: The site parcel meets the requirements for asserting an affirmative defense to CERCLA liability through bona fide prospective purchaser (BFPP) liability protection per CERCLA §101(40) as demonstrated through the following subsections.

- **Information on the Property Acquisition:** The City acquired the parcels through Warranty Deed (\$10.00) on December 5, 2014. The City of Ottawa is the sole owner of the parcels, acquired from Compatible Glass, LLC. The City of Ottawa holds no familial, contractual, corporate, or financial relationships of affiliations with any prior owners or operators (or other potentially responsible parties) of the property.
- **Pre-Purchase Inquiry:** The City of Ottawa completed a Phase I ESA in accordance with ASTM E1527-13, satisfying All Appropriate Inquiry, on November 14, 2014. The Phase I ESA was conducted by Mr. Christopher Lewis and Ms. Erin Jarrett, Environmental Professionals with Fehr Graham & Associates, LLC.
- **Timing and/or Contribution Toward Hazardous Substance Disposal:** All disposal of hazardous substances and comingled petroleum at the Site occurred prior to the City of Ottawa acquiring the property. The City of Ottawa has not contributed or arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- **Post-Acquisition Uses:** The City of Ottawa Streets Department has stored equipment and City holiday decorations in the Site building since acquisition. No other operations have occurred on the Site, nor has the City of Ottawa allowed operations by others on the Site, since acquisition of the parcel (acquisition date provided above).
- **Continuing Obligations:** Since site acquisition, the City of Ottawa Police Department and City Officials have monitored the site for trespassing, dumping, and littering. The City of Ottawa intends on enrolling the site into the Illinois EPA Site Remediation Program to evaluate contaminant exposure routes in preparation for site remediation.

The City of Ottawa is committed to complying with the following future obligations:

- Compliance with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;

- Assist and cooperate with those performing the cleanup and provide access to the property;
- Compliance with all information requests and administrative subpoenas that have or may be issued in connection with the property, and
- Providing all legally required notices.

13. Cleanup Authority and Oversight Structure:

a. Describe how you will oversee the site:

The City of Ottawa plans to enroll the site into the Illinois EPA voluntary Site Remediation Program (SRP) with the intention of obtaining a No Further Remediation (NFR) letter relating to the identified subsurface impacts. Accordingly, the numerical cleanup objectives for subsurface contamination are the TACO remediation objectives for residential, industrial/commercial, and construction worker receptors.

b. Provide your plan to acquire access to relevant adjacent or neighboring properties if necessary: The City of Ottawa controls a majority of the access to the Site along Boyce Lane and Chestnut Street. The City of Ottawa will coordinate an access agreement with the southern property owner located between the building and Deleon Street. The lot to the north of the Site is a vacant lot and does not pose a problem to the work being done on the Site.

14. Community Notification:

a. Draft Analysis of Brownfield Cleanup Alternatives

A Draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the project site. The City made it available to the public for review and comment on November 1, 2023. The ABCA and DRAFT Cleanup Grant Application were available for review at City Hall and on the City's website: <https://cityofottawa.org/> The DRAFT ABCA is included in this grant submittal.

b. Community Notification Ad

The City of Ottawa published a community notification advertisement in the local newspaper, the Shaw Media, on October 26, 2023. This ad indicated the following:

- that a copy of the City's grant application, including the Draft ABCA, is available for public review and comment;
- how to comment on the draft application;
- where the draft application is located (with City Clerk); and
- the date and time of a public meeting (November 2, 2023, 1:30 p.m.)

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

c. Public Meeting

The City of Ottawa held a Public Meeting on November 2, 2023 at 1:30 p.m. to discuss the draft application and consider public comments on the application and project. From the Public Meeting, the City is including the following in their grant application submittal:

- the comments or a summary of the public comments received;
- the applicant's response to those comments;
- Meeting notes or a summary of the public meeting

d. Submission of Community Notification Documents

The City of Ottawa has included the items listed below in their Cleanup Grant application submittal to US EPA:

- a copy of the draft ABCA
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application
- the comments or a summary of comments received
- the applicant's response to those public comments
- meeting notes or summary from the public meeting
- meeting sign-in sheets

15. Named Contractors and Subrecipients:

Not Applicable.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

217/785-8726

November 9, 2023

City of Ottawa
ATTN: Robert Hasty
301 W. Madison Street
Ottawa, IL 61350

**Subject: State Acknowledgement Letter for the City of Ottawa
FY2024 US EPA Brownfield Cleanup Grant Application**

Dear Mayor Robert Hasty,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Cleanup Grant application to U.S. EPA. The City of Ottawa is applying for a \$2,459,639 Cleanup Grant.

The grant will be a Cleanup Grant for Hazardous Substances and will be used on a site located at 518 Deleon Street, Ottawa, Illinois. The site is not currently enrolled in the State of Illinois Site Remediation Program but is eligible to be, and the city is moving toward enrolment in January to February of 2024. Based on the current information, there is a sufficient level of site characterization.

Illinois EPA acknowledges City of Ottawa's efforts to obtain federal Brownfields funds for this project. If you have any questions, I may be contacted at the above address or telephone numbers below, or at Jacob.fink@illinois.gov.

Sincerely,

Jacob Fink
Brownfield Program Administrator
Bureau of Land/Office of Site Evaluation
Office# (217) 785-8726
Cell# (217) 986-0818
Jacob.fink@illinois.gov



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