



R05-24-C-010

**Cuyahoga County Land Reutilization Corp.**

812 Huron Road E, Suite 800 Cleveland, Ohio 44115

Tel (216) 698-8853 Fax (216) 698-8972

**Narrative Information Sheet**

**1.) Applicant Identification**

Cuyahoga County Land Reutilization Corporation  
812 Huron Road E, Suite 800  
Cleveland, Ohio 44115

**2.) Funding Requested**

- a. **Grant Type** - Single Site Cleanup
- b. **Federal Funds Requested** - \$500,000

**3.) Location**

City of Cleveland, Cuyahoga County, Ohio

**4.) Property Information**

Proposed Hillson Nut Expansion Project  
3203 W. 71<sup>st</sup> Street, Cleveland, Cuyahoga County, Ohio 44102  
Permanent Parcel #006-28-038

**5.) Contacts**

- a. **Project Director**  
Kim Steigerwald, Acquisitions Manager  
216-698-8802  
[KSteigerwald@cuyahogalandbank.org](mailto:KSteigerwald@cuyahogalandbank.org)  
812 Huron Road E., Suite 800, Cleveland, Ohio 44115
  
- b. **Chief Executive/Highest Ranking Elected Official**  
Gus Frangos, President, and General Counsel  
216-698-8616  
[gfrangos@cuyahogalandbank.org](mailto:gfrangos@cuyahogalandbank.org)  
812 Huron Road E., Suite 800, Cleveland, Ohio 44115

**6.) Population**

Population of Cleveland, Ohio is 372,632 (([www.census.gov](http://www.census.gov)) population estimates based on April 1, 2020, U.S. Census)

## Narrative/Ranking Criteria for Cleanup Grants

### 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**

*“Cleveland was yet again the second poorest large city in the US,”* this according to the Center for Community Solutions early analysis of 2022 U.S. Census Bureau data.

The City of Cleveland, Ohio with a population of approximately 370,000, is situated in northeast Ohio; along interstate I-90 and the southern shores of Lake Erie. It is a proud community with a great history of industrial development starting in the early to mid-19th century, led by the iron and steel industries, the petroleum refining industry, and the chemical industry. These industries were pillars of Cleveland from the mid-19th century through the 1950s and 1960s.

However, like many cities in the rust belt, Cleveland experienced a large decline in its industrial and manufacturing sectors beginning with the Steel Recession of the 1970s.

Our target area, and project site, is located in Census Tract 1027, which is part of the Stockyards neighborhood of Cleveland. The neighborhood gets its name from the Cleveland Union livestock yards that thrived there throughout the first half of the 20th Century. At its peak, the area was home to the country’s seventh largest meat slaughtering and packing operations. But by the late 1960s trucking largely replaced shipping by rail and the meat industry moved most of its operations west. In 1968, the stockyards shut down and a large part of the area was redeveloped as a shopping center. The loss of heavy industry impacted the area greatly during the period from 1970 to the mid-1990s.

The Cuyahoga County Land Reutilization Corporation, the City of Cleveland, and the Stockyards neighborhood understand that they cannot rely on heavy industry coming back, therefore it is reinventing the neighborhood with creative economic solutions. An economic solution to the revitalization of Census Tract 1027, the project target area, is the proposed Hillson Nut Company Expansion Project.

The Hillson Nut Company is a small family and female owned company and has been a staple of the west side of Cleveland since 1935. For several years, the Hillson Nut Company had interest in buying vacant parcels next to their facility. The adjoining parcels had historically been an eye sore and overgrown but were also the perfect opportunity to expand their physical footprint. When the Cuyahoga County Land Reutilization Corporation acquired the project site, the Hillson Nut Company, supported by the Cleveland Industrial Retention Initiative, was quick to coordinate a group meeting. Anne Kennedy, president of Hillson Nut Company, shared her vision and need for expansion with the team at the Cuyahoga County Land Reutilization Corporation.

The expansion of the Hillson Nut Company will be the catalyst for a larger transformation within the target area. The site remediation will allow the Hillson Nut Company to expand its current building to increase capacity and allow for additional processing lines, the addition of a café and retail store on the premises and the creation of jobs for local community members. The site for this clean-up grant project is integral to the continued operations and expansion goals of the Hillson Nut Company, the creation of jobs for community members, and the catalyst for additional redevelopment projects in the target area.

##### **1.a.ii Description of the Proposed Brownfield Site(s)**

The Proposed Hillson Nut Company Expansion Project, the Brownfield Cleanup Grant Site, is located at 3203 W. 71<sup>st</sup> Street in Cleveland, Ohio, Cuyahoga County Permanent Parcel

006-28-038, within Census Tract 1027. It is located adjacent to and directly north of the current Hillson Nut Company facility.

The Site is irregular-shaped and comprised of approximately 1.28 acres of vacant industrial land situated on the east side of W. 71<sup>st</sup> Street.

The Site was developed for industrial purposes as early as 1903 with several textile and leather manufacturers. By 1937, the textile and leather manufacturing buildings were razed and by 1950, the Site was developed with a large contractor equipment warehouse and at least three underground storage tanks (USTs). The Site was later utilized as a chemical warehouse from the 1960s through at least the early 1980s. Historical occupants of the Site consist of Hull R.O. Company, Inc. (chemical manufacturing company), Rohco, Inc. (chemical manufacturing company), and various commercial companies. Vendetta Towing, Inc. most recently occupied the Site in 2018. The on-site structure was razed circa 2018 and the Site has been vacant since. Additionally, based on historical environmental assessments, the three USTs still appear to be present within the southwest portion of the Site.

Results of soil and groundwater sampling by environmental consultants indicate that select Resource Conservation & Recovery Act (RCRA) Metals, volatile organic compounds (VOCs), including petroleum constituents, polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPH) are present within the subsurface of the Site and exceed Applicable or Relevant and Appropriate Requirements (Ohio Bureau of Underground Storage Tank Regulations [BUSTR] and Ohio EPA Voluntary Action Program [VAP]). It appears the source of subsurface petroleum impact is from leaking UST components and/or poor operation and maintenance practices of the USTs. Additionally, it appears that the source of non-petroleum related impact to the subsurface is from the historical long-term industrial/manufacturing uses at the Site.

### **1.b Revitalization of the Target Area**

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

Part of the unique redevelopment strategy is two organizations working collaboratively to remediate a brownfield property and redevelopment the Site for the expansion of the Hillson Nut Company, which will eliminate a blighted area and will kick start the target area's economic engine. The Cuyahoga County Land Reutilization Corporation and the Hillson Nut Company are jointly pursuing the development along an approximate half-block corridor of W. 71<sup>st</sup> Street, to further their respective missions, to meet the needs of the community, and establish an attractive, financially viable, and mutually beneficial outlet for the target area.

This development will likely be funded entirely through private contributions at no cost to residents, attracting those who live and work in Cleveland and the Stockyards neighborhood.

According to “**Stockyards Neighborhood Plan Summary**” (January 2, 2007), <https://planning.clevelandohio.gov/cwp/pdf/stockMaps.pdf>, the Stockyards is a neighborhood that faces many challenges. To ensure that the area remains a viable residential neighborhood with retail amenities, significant redevelopment efforts must be undertaken. Chief among the challenges faced by the Stockyards are vacant industrial sites. According to the neighborhood plan summary, the Site is in a light industrial land use area and located within a fragile neighborhood market typology. The redevelopment of vacant industrial sites is listed as one of the chief challenges faced by the Stockyards neighborhood. The proposed Hillson Nut Company Expansion aligns with the January 2007 Stockyards Neighborhood Plan Summary goals.

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

The proposed Hillson Nut Expansion Project, in the heart of Census Tract 1027, located in the Stockyards neighborhood of Cleveland has the capabilities to generate the following economic and social outcomes with assistance from cleanup of the Site:

- Improve the eyesore of the Site and enhance the taxable value of the Site itself, as well as neighboring sites. Add additional tax revenue benefits for the local community through strengthened schools, improved infrastructure, and enhanced quality of life amenities.
- Improvement to community morale due to the remediation and redevelopment of a vacant, blighted property in the neighborhood.
- Improvement to public health by preventing exposure to hazardous substances.
- Approximately 12 new jobs will be created with the expansion of Hillson Nut Company.

### **1.c Strategy for Leveraging Resources**

#### **1.c.i Resources Needed for Site Characterization**

If additional funds are required to further characterize the Site, the Cuyahoga County Land Reutilization Corporation will seek additional funding from the Ohio EPA Targeted Brownfield Assessment (TBA) Program and/or the Ohio Department of Development Brownfield Remediation Program. The Cuyahoga County Land Reutilization Corporation was previously awarded approximately \$50,000 from the Ohio EPA TBA Program which was subsequently used to investigate, assess, and characterize the Site. Due to the current extent of characterization, if additional funding is necessary, we expect that any additional funding will be adequate and sufficient for additional site characterization.

#### **1.c.ii Resources Needed for Site Remediation**

Based on current site characterization and delineation of chemicals of concern, the Cuyahoga County Land Reutilization Corporation fully expects the EPA Cleanup Grant, if awarded, to be sufficient to cleanup and remediate the Site.

#### **1.c.iii Resources Needed for Site Reuse**

The proposed Hillson Nut Company Expansion project, once the site is remediated, will likely be fully funded by private contributions.

#### **1.c.iv Use of Existing Infrastructure**

The existing sewer, water, and electric utilities will be re-used which will eliminate demolition and/or installation costs. Additionally, the Cuyahoga County Land Reutilization Corporation owns a small parking lot to the south of the existing Hillson Nut facility. The parking lot will be resurfaced and made available as off-street parking for Hillson Nut employees.

## **2 Community Need and Community Engagement**

### **2.a Community Need**

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

The Cuyahoga County Land Reutilization Corporation does not have the resources to pay for the cleanup of a property of this magnitude. Additionally, according to data from the United States Census Bureau and 5-year estimates from the 2021 American Community Survey, the median annual household income in Census Tract 1027 (target area) is approximately \$26,000 with an unemployment rate of approximately 7.0%. This compared to the median annual household income and unemployment rate of the City of Cleveland at approximately \$37,000 and 5.2%, the State of Ohio at \$65,000 and 2.3% and the United States at \$75,000 and 3.7%.

This grant will help complete the necessary transformation of the Proposed Hillson Nut Expansion Project, which will directly improve the health and welfare of the area.

**2.a.ii Threats to Sensitive Populations**

**2.a.ii.(1) Health or Welfare of Sensitive Populations**

The welfare of the community in Census Tract 1027 is disturbing. As seen in the table below, the target brownfield area has some staggering demographics including a poverty rate of 44.9%, with 54.9% of children living in poverty. This is over double that of the Ohio and national averages for each demographic.

	Census Tract 1027	Cleveland City	Cuyahoga County	Ohio	National
<b>Population</b>	4,074	372,624	1,264,817	11,655,397	324,697,795
<b>Poverty Rate</b>	44.9%	31.4%	16.4%	13.4%	12.6%
<b>Unemployment Rate</b>	7.0%	8.9%	5.2%	3.7%	4.3%
<b>Percent Minority</b>	55.2%	61.4%	36.9%	19.1%	24.5%
<b>Disability</b>	20.9%	20.5%	15.4%	14.4%	13.4%
<b>Children in Poverty</b>	54.9%	48.2%	24.0%	17.7%	16.3%

All the information for these six areas were found at: <https://factfinder.census.gov> <https://www.census.gov/acs/www/data/data-tables-and-tools/narrative-profiles/2021/report.php?geotype=tract&tract=102700&state=39&county=035> and [www.bls.gov](http://www.bls.gov)

Remediation and redevelopment of the site has the potential to reduce health risks and potential exposure to sensitive populations and others in the area and bring in local markets creating healthier food options. In addition, the area will be made safer.

**2.a.ii.(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions**

*“In 2019, 7.5% of Cuyahoga County adults had been diagnosed with cancer* according to the Cuyahoga County Community Health Needs Assessment for 2022. Cuyahoga County resident’s health related issues are well above that of the state and national averages. While specific statistics could not be found for our target area, it only makes sense to believe the health statistics of the hardest hit residents would be similar at best.

	Cuyahoga County	Ohio	National
<b>Caner Rate per 100,000 people (2014-2018)</b>	479.7	467.5	450.5
<b>Asthma Rates (2005-2009)</b>	10.2%	9.9%	8.8%
<b>Infant Mortality Rates per 1,000 (2020)</b>	7.7	6.7	5.4

The information for these areas were found at: Ohio Department of Health – Cuyahoga County Cancer Profile 2021; Cuyahoga County Board of Health, Prevention Research Center for Healthy Neighborhoods – Asthma in Cleveland; Healthy Northeast Ohio - <https://www.healthyneo.org/indicators/index/view?indicatorId=289&localeId=2112&comparisonId=7227>

**2.a.ii.(3) Environmental Justice**

**2.a.ii.(3a) Identification of Environmental Justice Issues**

Environmental Justice is defined as the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income with respect to the development, implementation and enforcement of environmental laws, regulations, and policies. The EPA’s

EJScreen tool was used to evaluate our target area (Census Tract 1027) and identify if the target area is located within an area that has higher environmental burdens and vulnerable populations. According to the EJScreen tool, the target area ranks in the 90th percentiles in the State of Ohio and National Environmental Justice Indicators for nine of the thirteen environmental justice indicators used by the EJScreen. Additionally, according to the Climate and Economic Justice Screening Tool, the site is identified in a disadvantaged census tract.

<b>Environmental Justice Indicators Percentile</b>	<b>State Percentile</b>	<b>National Percentile</b>
<b>Particulate Matter</b>	91%	93%
<b>Ozone</b>	95%	91%
<b>Diesel Particulate Matter</b>	96%	94%
<b>Air Toxics Cancer Risk</b>	--	49%
<b>Air Toxics Respiratory</b>	91%	74%
<b>Toxic Releases to Air</b>	93%	96%
<b>Traffic Proximity</b>	94%	90%
<b>Lead Paint</b>	96%	97%
<b>Superfund Proximity</b>	74%	56%
<b>RMP Facility Proximity</b>	96%	95%
<b>Hazardous Waste Proximity</b>	95%	94%
<b>Underground Storage Tank</b>	96%	95%
<b>Wastewater Discharge</b>	80%	80%

**2.a.ii.(3b) Advancing Environmental Justice**

Communities of color and low-income families have long suffered disproportionately from environmental pollution left behind in their communities. The cleanup and remediation of the proposed Hillson Nut Expansion Project site will address the longstanding environmental injustices within our target area by removing orphaned USTs and removing and remediating hazardous substance and petroleum impacted soils and groundwater. The cleanup will reduce hazardous substances and petroleum product exposure to community members.

The community will be included in the brownfields reuse process, through community engagement meetings to provide the community with a meaningful role and input on how to minimize displacement through the cleanup and reuse process.

**2.b Community Engagement**

**2.b.i & 2.b.ii Project Involvement & Project Roles**

<b>Partner Name</b>	<b>Point of contact (name, email &amp; phone)</b>	<b>Specific role in the project</b>
Cuyahoga County Land Reutilization Corporation	Kim Steigerwald / 216-698-8802 <a href="mailto:KSteigerwald@cuyahogalandbank.org">KSteigerwald@cuyahogalandbank.org</a>  Doug Sawyer / 216-698-3543 <a href="mailto:dsawyer@cuyahogalandbank.org">dsawyer@cuyahogalandbank.org</a>	Project Manager of cleanup for the proposed Hillson Nut Expansion Project. Grant management abilities.

Hillson Nut Company	Anne Hillson Kennedy / 216-961-4477 anne@hillsonnut.com	President of Hillson Nut Company
Ohio EPA	Roxanne Anderson / 614-644-2938 Roxanne.Anderson@epa.ohio.gov	Provided (TBA program) phase 1 and 2 and "ABCA"

**2.b.iii Incorporating Community Input**

The Cuyahoga County Land Reutilization Corporation’s goals are to help the community understand brownfield project objectives and demonstrate how the process directly improves the future of the community. It is essential to get the neighborhood involved in the project and promote local interest in the proposed Hillson Nut Expansion Project.

Our proven successful community engagement program includes board members and or staff regularly attending community watch/improvement meetings where the discussion usually centers on vacant and abandoned properties and how the Cuyahoga County Land Reutilization Corporation can address these issues. During the initial proposed Hillson Nut Expansion Project public meeting, held November 7, 2023, Mrs. Steigerwald discussed the purpose and objectives of the cleanup project. One person in attendance was encouraged by the public-private partnership between the Cuyahoga County Land Reutilization Corporation and Hillson Nut Company. After the grant award, we will again hold a public kickoff meeting to discuss the remediation scope of work, and the schedule for implementation and completion. We will solicit comments and recommendations. Project information will be posted on our website and provided to the local community development corporation, MetroWest Community Development Organization, as cleanup progresses.

Thereafter, Cuyahoga County Land Reutilization Corporation staff will hold regularly public meetings to provide progress reports to keep ongoing communication, and the public will have an opportunity for comments and/or questions. Six public meetings involving one kickoff event, four cleanup project status meetings including meetings at key points in the cleanup activities, and one final public meeting when the cleanup is complete. Meetings and publications will be conducted in English, and Spanish speaking translators will be on hand to accommodate Spanish speaking residents. Approximately 8.7% of the population of the City of Cleveland speaks Spanish at home.

**3 Task Descriptions, Cost Estimates, and Measuring Progress**

**3.a Proposed Cleanup Plan**

The proposed cleanup plans involve the following: (1) closure and proper removal of USTs and petroleum impacted soils (up to approximately 300 tons of petroleum contaminated soil), under BUSTR guidelines; and (2) proper removal and disposal of approximately 1,000 tons of non-petroleum soil contamination from the east and north-central portion of the Site, under Ohio EPA VAP guidelines.

These cleanup alternatives will remove petroleum contamination in the soil from the southwest portion of the Site (UST area) and reduce groundwater contamination by removing the source of contamination. These cleanup alternatives will also remove non-petroleum contamination in shallow surface soils from the east and north-central portions of the Site. Human health and environmental risks posed by the chemicals of concern will be mitigated and allow for the redevelopment of the Site. These alternatives have the greatest ability to meet the objectives of preparing the Site for the planned reuse.

### 3.b Description of Tasks and Activities

<b>Task/Activity: Task 1 – Final ABCA/QAPP/Remediation Design Plans</b>
<p><b>i. Project Implementation</b></p> <ul style="list-style-type: none"><li>▪ <b>EPA-funded tasks/activities:</b> (1) procure an environmental consultant, prepare documents for the cleanup project. (2) Environmental consultant will finalize the draft Analysis of Brownfield Cleanup Alternatives (ABCA), develop the Quality Assurance Project Plan (QAPP), develop health and safety plans, and develop the cleanup design plans and specification. (3) enroll the site in the Ohio EPA VAP</li><li>▪ <b>Non-EPA grant resources needed to carry out task/activities, if applicable:</b> Not applicable</li></ul>
<p><b>ii. Anticipated Project Schedule:</b> This task will be completed during the first and second quarters of the grant period.</p>
<p><b>iii. Task/Activity Lead:</b> Applicant will procure the environmental consultant. Once procured, the environmental consultant will be the task activity lead due to subject matter experience and expertise.</p>
<p><b>iv. Outputs:</b> ABCA, QAPP, Health and Safety Plans, and design plans and specifications.</p>

<b>Task/Activity: Task 2 – Site Clean Up and NFA Letter(s)</b>
<p><b>i. Project Implementation</b></p> <ul style="list-style-type: none"><li>▪ <b>EPA-funded tasks/activities:</b> (1) Removal of USTs. (2) Removal of petroleum and hazardous substance contaminated soils (approximately 1,300 tons in total). (3) Confirmation soil sampling conducted by the environmental consultant.</li><li>▪ <b>Non-EPA grant resources needed to carry out task/activities, if applicable:</b> Not applicable</li></ul>
<p><b>ii. Anticipated Project Schedule:</b> This task will be completed during the third and fourth quarters of the grant period.</p>
<p><b>iii. Task/Activity Lead:</b> The environmental consultant will be the task/activity lead due to subject matter experience and expertise.</p>
<p><b>iv. Outputs:</b> (1) BUSTR Closure Assessment Report. (2) Ohio EPA No Further Action Letter (NFA) for Ohio EPA's approval to issue a Covenant Not to Sue (CNS)</p>

<b>Task/Activity: Task 3 – Community Outreach</b>
<p><b>i. Project Implementation</b></p> <ul style="list-style-type: none"><li>▪ <b>EPA-funded tasks/activities:</b> (1) Six community outreach / public meetings</li><li>▪ <b>Non-EPA grant resources needed to carry out task/activities, if applicable:</b> Not Applicable.</li></ul>
<p><b>ii. Anticipated Project Schedule:</b> This task will be completed throughout the grant period.</p>



- iii. **Task/Activity Lead:** Cuyahoga County Land Reutilization Corporation (Applicant)
- iv. **Outputs:** Meeting Minutes

<b>Task/Activity: Task 4 – Programmatic Costs</b>
<ul style="list-style-type: none"> <li>i. <b>Project Implementation</b> <ul style="list-style-type: none"> <li>▪ <b>EPA-funded tasks/activities:</b> Not Applicable</li> <li>▪ <b>Non-EPA grant resources needed to carry out task/activities, if applicable:</b> Not Applicable. The Cuyahoga County Land Reutilization Corporation’s staff time and materials will be in-kind and not charged to the cleanup grant.</li> </ul> </li> <li>ii. <b>Anticipated Project Schedule:</b> This task will be completed throughout the first, second, and third quarters of the grant period.</li> <li>iii. <b>Task/Activity Lead:</b> Cuyahoga County Land Reutilization Corporation (Applicant)</li> <li>iv. <b>Outputs:</b> Quarterly and annual progress reports to the USEPA – USEPA Required Reporting</li> </ul>

**3.c Cost Estimates**

Budget Categories	Task 1	Task 2	Task 3	Task 4	Total
	Final ABCA, QAPP & Remediation Design Plans	Site Clean Up	Community Outreach	Programmatic Costs	
Personnel					
Fringe Benefits					
Travel					
Equipment					
Supplies					
Contractual	\$35,000		\$8,400	\$0	\$43,400
Construction		\$456,600			\$456,600
<b>Total Direct Costs</b>	<b>\$35,000</b>	<b>\$456,600</b>	<b>\$8,400</b>	<b>\$0</b>	<b>\$500,000</b>
Indirect Costs	\$0	\$0	\$0	\$0	\$0
<b>Total Fed Fund</b>	<b>\$35,000</b>	<b>\$456,600</b>	<b>\$8,400</b>	<b>\$0</b>	<b>\$500,000</b>
<b>Cost Share</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>
<b>TOTAL BUDGET</b>	<b>\$35,000</b>	<b>\$456,600</b>	<b>8,400</b>	<b>\$0</b>	<b>\$500,000</b>

**Task 1, Final ABCA/QAPP/Remediation Design Plans**

- Contractual Costs: 200 hours of environmental consultant cost, \$175/hr salary = \$35,000

**Task 2, Site Clean Up and NFA Letter**

- Construction Costs: 3 tank pulls at an average cost of \$4,000 (\$12,000); UST dewatering of 20,000 gallons at \$1.50/gallon (\$30,000); Construction Costs (\$370,600); Preparation of a Ohio EPA VAP NFA Letter (\$27,500); UST Closure Assessment & BUSTR Reporting (\$16,500)

**Task 3, Community Outreach**

- Contractual Costs: 48 hours of environmental consultant cost, (travel + meeting time) \$175/hr salary = ~\$8,400

**Task 4, Programmatic Costs**

- No Costs. The Cuyahoga County Land Reutilization Corporation's staff time and materials will be in-kind and not charged to the cleanup grant.

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

The Cuyahoga County Land Reutilization Corporation will track all the progress through ACRES, and provide its results of activities (outputs), milestones, and outcomes in its USEPA quarterly reports, and in its community meetings. Outputs to be measured will include the final ABCA, QAPP, plans and specifications document for contractor bidding, No Further Action Letter for Ohio EPA, BUSTR Closure Assessment Report, and six community meetings. These outputs will be monitored by the Cuyahoga County Land Reutilization Corporation on the Proposed Hillson Nut Expansion Project Brownfield Remediation Grant Chart and used to oversee the remediation contractors. Outcomes to be measured is obtaining a covenant not to sue (CNS) from Ohio EPA, by obtaining a No Further Action letter from BUSTR, putting this brownfield site back to beneficial reuse, and creating jobs on the Site.

**4 Programmatic Capability and Past Performance**

**4.a Programmatic Capability**

**4.a.i Organizational Structure**

The Cuyahoga County Land Reutilization Corporation will effectively manage all facets of the grant and oversee cleanup work with the combination of internal staff and outside consultants experienced in brownfield cleanup activities. The Cuyahoga County Land Reutilization Corporation manager of this grant is Ms. Kimberly Steigerwald, Acquisition Manager of the Cuyahoga County Land Reutilization Corporation. Ms. Steigerwald will oversee and manage this grant - contractor selections, project schedules, task implementation, and USEPA brownfield grant reporting requirements.

**4.a.ii Description of Key Staff**

Kimberly Steigerwald has 33 years of community development experience and has successfully managed both USEPA Brownfield Cleanup Grants and USEPA Assessments Grants for the City of Cleveland Heights and the Cuyahoga County Land Bank. Ms. Steigerwald has knowledge and experience for writing bid specifications and soliciting bids; coordination of public involvement, posting legal notices and working with web-based programs to post updates; tracking schedules for project needs; budgeting and draw-down submissions for payment; and oversight of contractors.

Douglas Sawyer is the Cuyahoga County Land Reutilization Corporation's Assistant General Counsel. Mr. Sawyer manages the day-to-day legal affairs of the Land Bank and provides legal counsel to Land Bank management and staff.

#### **4.a.iii Acquiring Additional Resources**

The Cuyahoga County Land Reutilization Corporation has significant experience hiring contractors and consultants and working with various municipal entities and other non-profit organizations. For this grant, it plans on hiring a contractor to perform the cleanup and serve as the Qualified Environmental Professional (QEP). The Request for Proposal (RFP) for these services will require that the successful contractor have the necessary qualifications to perform cleanups that meet the grant terms and conditions. The Cuyahoga County Land Revitalization Corporation will follow the Six Good Faith Efforts, as defined by the USEPA, to promote the receipt of proposals from Disadvantaged Business Enterprises (DBE), Minority Business Enterprises (MBE), and Women Business Enterprises (WBE).

#### **4.b Past Performance and Accomplishments**

##### **4.b.i Currently Has or Previously Received an EPA Brownfields Grant**

Since 2010, The Cuyahoga County Land Reutilization Corporation has successfully secured and managed multiple USEPA Brownfield Grants, including the following:

- FY2011-USEPA Brownfield Assessment Grant Award. BF-00E00415. Total \$400,000. Term 8/1/2020 – 7/31/2013. Closed.
- FY 2016-USEPA Brownfield Assessment Grant Award. BF-00E02022. Total \$400,000. Term 10/1/2016 – 9/30/2019. Closed.
- FY2020-USEPA Brownfield Assessment Grant Award. BF 00E02732. Total \$300,000. Term 10/1/2019- 9/30/2022. Closed.
- FY 2023-USEPA Brownfield Cleanup Grant Award. BF 00E03571. Total \$500,000. Term 10/1/23-9/30/27. Underway.

##### **4.b.i(1) Accomplishments** The following were achieved under the current/most recent grant(s):

- FY2011-USEPA Brownfield Assessment Grant Award: Completed 14 Phase Is, 8 Phase IIs, 4 Asbestos Surveys, 1 Lead Based Paint Survey, 1 Risk Assessment.
- FY 2016-USEPA Brownfield Assessment Grant Award: Completed 16 Phase Is, 14 Phase IIs, 5 Asbestos Surveys, 1 Risk Assessment, 1 Risk Mitigation Plan, 1 Ground Penetrating Radar Survey.
- FY2020-USEPA Brownfield Assessment Grant Award: Completed 15 Phase Is, 9 Phase IIs, 5 Asbestos Surveys, 1 Lead Based Paint Survey, 2 Neighborhood Brownfield Inventories, 1 Landfill Management Plan.
- FY 2023-USEPA Brownfield Cleanup Grant Award. Recently hired QEP for management of remediation contractors.

##### **4.b.i(2) Compliance with Grant Requirements**

The open grant and all closed grants follow the work plan, schedule, terms and conditions of the agreement. All reporting has been timely and acceptable, and all outcomes/outputs have been met or exceeded.

For all closed EPA Brownfield Grants, the Cuyahoga County Land Reutilization Corporation expended all funds which were awarded except for \$14,894 from the FY2020-USEPA Brownfield Assessment Grant Award. The properties targeted for this grant award were adequately assessed without expending all funds.

No funds have yet been expended for the recently awarded FY 2023-USEPA Brownfield Cleanup Grant Award. The Cuyahoga County Land Reutilization recently procured a QEP. Remediation and cleanup of the property has yet to commence. It affirms that all funds will be expended by the end of the Period of performance as defined in 2 CFR 200.1.

**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 proposed 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 remediation/reuse; secured resources is identified in the Narrative and substantiated in the attached documentation	n/a
The proposed site(s) is adjacent to a body of water (i.e., the border of the 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 proposed site(s) is in a federally designated flood plain.	n/a
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	n/a
The reuse of the proposed cleanup 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.) Releasing Copies of Applications**

Not applicable. This application does not have confidential, privileged, or sensitive information.

### **III.B. Threshold Criteria for Cleanup Grants**

#### **III.B.1a Applicant Eligibility**

Cuyahoga County Land Reutilization Corporation  
812 Huron Road E, Suite 800, Cleveland, Ohio 44115

The Cuyahoga County Land Reutilization Corporation (CCLRC) is a community improvement corporation as set forth in Chapter 1724 of the Ohio Revised Code. It is an instrumentality and agency of the County. USEPA confirmed its eligibility under 2 CRF 200.1 in an email dated October 19, 2023. (Exhibit A)

**III.B.1b** CCLRC is not exempt from Federal Taxation under section 501(c)(4).

#### **III.B.2 Previously Awarded Cleanup Grants**

The Cuyahoga County Land Reutilization Corporation affirms that the proposed Hillson Nut Expansion Project located at 3203 W. 71<sup>st</sup> Street, Cleveland, Ohio 44102 has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

#### **III.B.3 Expenditure of Existing Multipurpose Grant Funds**

The Cuyahoga County Land Reutilization Corporation affirms that we do not have an open EPA Brownfields Multipurpose Grant.

#### **III.B.4 Site Ownership**

The Cuyahoga County Land Reutilization Corporation took ownership of the Site located at 3203 W. 71<sup>st</sup> Street, Cleveland, Ohio, 44102 from the State of Ohio Forfeiture, CV #922832 on July 21, 2022.

#### **III.B.5 Basic Site Information**

- a) Proposed Hillson Nut Company Expansion Project
- b) 3203 W. 71<sup>st</sup> Street, Cleveland, Cuyahoga County, Ohio 44102

#### **III.B.6 Status and History of Contamination at the Site**

- a) The Proposed Hillson Nut Company Expansion Project site (1.28 acres of vacant industrial land) is contaminated with a combination of petroleum products and hazardous substances.
- b) The Site was developed for industrial purposes as early as 1903 with several textile and leather manufacturers. By 1937, the textile and leather manufacturing buildings were razed. By 1950, the Site was developed with a large contractor equipment warehouse and at least three underground storage tanks (USTs). The Site was later utilized as a chemical warehouse from the 1960s through at least the early 1980s. Historical occupants of the Site consist of Hull R.O. Company, Inc. (chemical manufacturing company), Rohco, Inc. (chemical manufacturing company), and various commercial companies. Vendetta Towing, Inc. most recently occupied the Site in 2018. The on-site structure was razed circa 2018 and the Site has been vacant since. Additionally, based on historical environmental assessments, the three USTs still appear to be present within the southwest portion of the Site.
- c) Results of soil and groundwater sampling by environmental consultants and Ohio Environmental Protection Agency (EPA) indicate that select Resource Conservation &

Recovery Act (RCRA) Metals, volatile organic compounds (VOCs), including petroleum constituents, polycyclic aromatic hydrocarbons (PAHs), and total petroleum hydrocarbons (TPH) are present within the subsurface of the Site and exceed Applicable or Relevant and Appropriate Requirements (Ohio Bureau of Underground Storage Tank Regulations [BUSTR] and Ohio EPA Voluntary Action Program [VAP]).

- d) It appears the source of subsurface petroleum impacts are from leaking UST components and/or poor operation and maintenance practices of the USTs. Additionally, it appears that the source of non-petroleum related impacts to the subsurface are from the historical long-term industrial/manufacturing uses at the Site. The petroleum impacts to the subsurface appear delineated to the southwest portion of the Site, proximate to the suspect UST cavity. The non-petroleum impacts to the subsurface appear delineated to the east portion of the Site and to a small area located in the north-central portion of the Site.

### **III.B.7 Brownfield Site Definition**

The Cuyahoga County Land Reutilization Corporation affirms that the Proposed Hillson Nut Expansion Project site located at 3203 W. 71<sup>st</sup> Street, Cleveland, Ohio 44102, is not listed on the National Priorities List, it is 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. It is not subject to jurisdiction, custody, or control of the United States government.

### **III.B.8 Environmental Assessment Required for Cleanup Proposals**

A Phase II ESA was conducted in July 2023 to identify if a release of petroleum products and/or hazardous substances had occurred at the Site. Soil borings were advanced and temporary monitoring wells were installed for the collection of soil and groundwater samples. Results of the sampling and analyses indicated that shallow surface (0-2 feet) soils comprised primarily of fill materials at the Site are impacted by benzo(a)pyrene, lead, arsenic, and/or mercury in excess of Ohio VAP cleanup standards and/or BUSTR Closure Action Levels. Moreover, the results of the sampling and analyses also indicated that groundwater is impacted by arsenic, chromium, and lead in excess of Ohio VAP Unrestricted Potable Use Standards (UPUS).

Based on the analytical results from the July 2023 Focused Phase II ESA, a Supplemental Phase II ESA to adequately assess and delineate subsurface impacts at the Site is on-going and will be completed by June 2024. Although the Supplemental Phase II ESA is not yet complete, preliminary data review indicates that soils near the identified USTs are impacted with petroleum VOC impact (1,2,4-trimethylbenzene) and Total Petroleum Hydrocarbon (TPH) impact (TPH C6-C12 and TPH C10-C20) which exceed applicable BUSTR Action Levels. Moreover, the results of the sampling and analyses also identified additional impacts to groundwater (select metals, VOCs, and polycyclic aromatic hydrocarbons [PAHs]) in excess of applicable VAP UPUS and BUSTR Groundwater Ingestion Action Levels.

It is the opinion of MSG that the impacted area of concern has been identified and defined.

### **III.B.9 Site Characterization**

- a) Not applicable
- b) Please find attached a letter dated November 8, 2023, from Ohio Environmental Protection Agency, acknowledging our intent to apply for FY24 grant funds and conduct cleanup activities. (Exhibit B)
- c) Not applicable

### **III.B.10 Enforcement or Other Actions**

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

### **III.B.11 Sites Requiring a Property-Specific Determination**

The Cuyahoga County Land Reutilization Corporation affirms that the Site does not need a Property-Specific Determination.

### **III.B.12 Threshold Criteria Related to CERCLA/Petroleum Liability**

#### **III.B.12.a.i.1 Indian Tribes**

Not applicable

#### **III.B.12.a.i.2 Alaska Native Village Corporations and Alaska Native Regional Corporations**

Not applicable

#### **III.B.12.a.i.3 Property Acquired Under Certain Circumstances by Units of State and Local Government**

- a) The Cuyahoga County, Ohio Treasurer foreclosed on Permanent Parcel No. 006-28-038 (and other Permanent Parcels not associated with the property), located at 3203 W. 71<sup>st</sup> Street, Cleveland, Ohio for unpaid taxes, assessments, penalties, interest, and other charges (total due \$205,599.42) Case Number CV 922832. The Property was offered for sale by Cuyahoga County Sheriff's department July 7, 2021, and again on July 21, 2021, and did not sell. Therefore, it was forfeited to the State of Ohio on August 30, 2021. On July 18, 2022, the Cuyahoga County Land Reutilization Corporation did request in writing that Permanent Parcel No. 006-28-038 be directly conveyed to the Cuyahoga County Land Reutilization Corporation, the Cuyahoga County Fiscal Officer, acting as an agent of the State of Ohio, then and there conveyed said real estate to the said Cuyahoga County Land Reutilization Corporation as prescribed in ORC 5723.04(B).
- b) Cuyahoga County Land Reutilization Corporation acquired ownership of the property via a deed transfer dated July 21, 2022.
- c) Cuyahoga County Land Reutilization Corporation affirms that we did not cause or contribute to any release of hazardous substances at the site.
- d) Cuyahoga County Land Reutilization Corporation affirms that we did not arrange for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**III.B.12.a.ii Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability**

**III.B.12.a.ii(1) Publicly Owned Brownfield Sites Acquired Prior To January 11, 2002**

Not applicable

**III.B.12.a.iii Landowner Protections from CERCLA Liability**

Not applicable

**III.B.12.b Property Ownership Eligibility - Petroleum Sites**

See the attached letter from BUSTR regarding responsible party viability for the UST petroleum contamination. (Exhibit C)

**III.B.12.b(1) Current and Immediate Past Owners**

The current owner of the Site is the Cuyahoga County Land Reutilization Corporation. The immediate past owner of the Site is Deputy County Fiscal Officer, Cuyahoga County.

**III.B.12.b(2) Acquisition of the Site**

The Cuyahoga County Land Reutilization Corporation acquired the Site through a deed transfer due to tax foreclosure/forfeiture.

**III.B.12.b(3) No Responsible Party for the Cleanup of the Site**

The current and past owner of the Site did not dispense or dispose petroleum or petroleum product contamination, did not exacerbate the existing petroleum contamination at the Site, did not own the Site when any dispensing or disposal of petroleum took place, and is taking reasonable steps regarding the contamination at the site.

**III.B.12.b(4) Cleaned Up by a Person Not Potentially Liable**

The Cuyahoga County Land Reutilization did not dispense or dispose of petroleum or petroleum products or exacerbate the existing petroleum contamination at the site and is taking reasonable steps with regard to the contamination at the site.

**III.B.12.b(5) Judgements, Orders, or Third-Party Suits**

Please find attached a letter dated November 3, 2023, from Ohio Department of Commerce, Division of State Fire Marshal, stating that no viable responsible party has been identified and the parcel is unlikely to be assessed, investigated, or cleaned up by a person that is potentially liable for the contamination on the parcel. (Exhibit C)

**III.B.12.b(6) Subject to RCRA**

The Site is not subject o any order under the Solid Waste Disposal Act.

**III.B.12.b(7) Financial Viability of Responsible Parties**

No responsible party has been identified by BUSTR.



### **III.B.13 Cleanup Authority and Oversight Structure**

- a) The Cuyahoga County Land Reutilization Corporation will oversee the cleanup grant and implementation in consultation with Ohio EPA. The Cuyahoga County Land Reutilization Corporation is working closely with Ohio EPA personnel to ensure we comply with Ohio EPA's VAP in order to receive a Covenant Not To Sue for the Site. This Covenant is vital to our redevelopment plan. The Cuyahoga County Land Reutilization Corporation has experience with federal grants and will use our grant management experience to our advantage.
- b) If off-site access is needed to carry out cleanup activities at the Site, The Cuyahoga County Land Reutilization Corporation will discuss the need for access, scope of work, and duration of work with neighboring properties. If needed, it will prepare a Consent for Access to Property form for the neighboring property owners to review and authorize.

### **III.B.14 Community Notification**

#### **III.B.14.a Draft Analysis of Brownfields Cleanup Alternatives**

##### **BUSTR Regulated Subsurface Contamination (REC-1/IA-1)**

**Option 1:** Do nothing (leaving site contaminated indefinitely)

**Option 2:** Permanent UST Closure & Removal. Proper closure and removal of the petroleum USTs and the removal of up to approximately 300 tons of contaminated soil surrounding the USTs under BUSTR guidelines.

##### **Hazardous Subsurface Contamination (REC-2/IA-2)**

**Option 1:** Do nothing (leaving site contaminated indefinitely)

**Option 2:** Capping. Cap the contaminated area with 2 feet of clean fill material (approximately 1,000 tons) under Ohio VAP guidelines.

**Option 3:** Soil Removal Activities. Includes the removal of shallow surface soils located throughout the Site under Ohio VAP guidelines. Remove approximately 1,000 tons of contaminated soil and replace with clean fill material.

#### **III.B.14.b Community Notification Ad**

##### **PUBLIC NOTICE EPA BROWNFIELDS CLEANUP GRANT PROPOSAL**

##### **Cuyahoga County Land Reutilization Corporation**

The Cuyahoga Land Bank intends to apply for funding under the FY 2024 USEPA Brownfield Cleanup Grant, for the property it owns at 3203 W. 71st Street, Cleveland, Ohio. A public meeting to discuss the draft application and draft analysis of brownfield cleanup alternatives, and consider public comments will be held on Tuesday, November 7, 2023, at 1:00 pm, at the offices of the Cuyahoga County Land Bank, Room 830. A copy of the draft application can be obtained by contacting Acquisitions Manager Kim Steigerwald at [ksteigerwald@cuyahogalandbank.org](mailto:ksteigerwald@cuyahogalandbank.org) or 216-698-8802.

Published on [www.cuyahogalandbank.org/about/public-notices-board-meetings](http://www.cuyahogalandbank.org/about/public-notices-board-meetings) on October 30, 2023.

The notice was also posted as a banner on the land bank's home page. A public notice was also posted at the office of the neighborhood community development corporation, MetroWest Community Development Organization.

**III.B.14.c Public Meeting (Exhibit D)**

See attached documentation from the November 7, 2023, public meeting.

**III.B.14.d Submission of Community Notification Documents (Exhibit E)**

See attached submission of community notification documents.

**III.B.15 Contractors and Named Subrecipients**

Not applicable. No contractors or subrecipients have been procured as part of this application and project.



Department  
of Commerce

Division of State Fire Marshal

Sheryl Macfield, Director



Mike DeWine, Governor  
Jon Husted, Lt. Governor

November 1, 2023

John Jurevis  
U.S. Environmental Protection Agency, Region 5  
77 West Jackson Boulevard  
Mail Code SE-7J  
Chicago, IL 60604-3507

**RE: Cuyahoga County Land Reutilization Corporation's Brownfield Cleanup Grant Proposal**

Dear Mr. Jurevis:

This letter acknowledges that the Cuyahoga County Land Reutilization Corporation notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to use the \$500,000 grant proposal for a brownfield cleanup grant for petroleum and hazardous waste. The target property is the proposed Hillson Nut Company Expansion at 3203 W. 71<sup>st</sup> Street, Cleveland. This property was a former manufacturing facility from the 1960s until 2018, when it was razed. Historically, there were three underground storage tanks on the property. The status of these tanks is unknown. The goal of the grant is to remediate the subsurface contamination to allow for expansion of the facility and add processing capacity, construct retail space and a café and increase job opportunities.

I am pleased to offer BUSTR's support for the Cuyahoga County Land Reutilization Corporation's Brownfield Cleanup Grant proposal. We look forward to working with the Cuyahoga County Land Reutilization Corporation and the U.S.EPA on this project.

Sincerely,

Christine G. Pyscher, P.G.  
Environmental Specialist  
Division of State Fire Marshal  
Ohio Department of Commerce

xc: Site File  
Kim Steigerwald, Cuyahoga County Land Reutilization Corporation