



**City of Brillion**  
201 N. Main Street  
Brillion, WI 54110  
Phone (920) 756-2250  
Fax (920) 756-2351

**RE: Grant Proposal by the City of Brillion for a Brownfield Cleanup Grant for  
Redevelopment Area 4 of the Brillion Iron Works Redevelopment**

The City of Brillion, Wisconsin (City) is pleased to submit the enclosed proposal to the United States Environmental Protection Agency (USEPA) for a cleanup grant for \$500,000 as part of the USEPA Fiscal Year (FY) 2024 Brownfield Grant Competition.

Per grant application requirements, the following identifies the applicant and contact for communication with USEPA:

**1. Applicant Identification**

- a. Name of Applicant: City of Brillion, Wisconsin
- b. Address of Applicant: 201 N. Main Street; Brillion, WI 54110

**2. Funding Requested**

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

**3. Location**

- a. City: City of Brillion
- b. County: Calumet County
- c. State: State of Wisconsin

**4. Property Information:**

- a. Property Name: Redevelopment Area 4 of the Brillion Iron Works Redevelopment
- b. Property Address: Park Avenue and North Parkway Drive; Brillion, Wisconsin 54110
- c. Property Coordinates: 44.178046, -88.060033

**5. Contacts**

- a. Project Director - City of Brillion:  
Name: Patricia Schreiber, Administrator Clerk/Treasurer  
Phone: 920-756-2250  
Email address: admin@brillionwi.gov  
Mailing address: 201 N. Main Street, Brillion, WI 54110

- b. Chief Executive/Highest Ranking Elected City Official  
 Name: Mike Smith, Mayor of the City of Brillion  
 Phone: 920-756-2250  
 Email address: msmithbrillion@gmail.com  
 Mailing Address: 201 N. Main Street; Brillion, WI 54110

**6. General population (2021 US Census Bureau Estimate)**

- a. City of Brillion = 3,262  
 (Source: policymap.com, with subscription)

**7. Other Factors**

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	Page 1
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Pages 2-3 Attachment A1
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	Page 1
The proposed site(s) is in a federally designated flood plain.	Page 2
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Page 2
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Page 2
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.	

**8. Releasing Copies of Applications**

Not Applicable

## **1.a. Project Area Description and Plans for Revitalization – Target Area and Brownfields**

**(i) Overview of Brownfield Challenges and Description of Target Area.** The City of Brillion (Pop. 3,262) has a long and storied history of providing a unique combination of hometown warmth, community sharing, emphasis on science, technology, engineering and math (STEM) education for students of all ages and backgrounds, bountiful recreation, and industrial opportunity. The City and surrounding region was settled by European farmers and entrepreneurs in the mid-to-late 19th Century focused on the area’s abundant natural resources; trees for lumber and limestone for lime. The early economy grew based on the exceptional agricultural fertility of the region’s soils, complemented by industrial manufacturing of farm implements to further increase agricultural outputs. Industrial development in the City was largely centered in the **Target Area** (Census Tract CT-55015020100; abbreviated CT-201) due to ease of railroad access and an abundant workforce. Although banners throughout downtown Brillion read “Small City, Big Heart”, the story of Brillion is sadly one played out in many small rural communities. The 20-parcel, 145-acre Brillion Iron Works foundry (**Target Brownfield**) which had once served as the City’s economic powerhouse through the 20th Century closed its doors in 2016, leaving only memories of a once-vibrant past and burdening the community with substantial loss and a massively blighted property as they look to reinvent themselves for a modern 21st Century. The failing industrial sector and collapse of supporting commercial operations created 172 potential brownfields in the City, the largest by far being the former Brillion Iron Works foundry. Prolonged former industrial operations have resulted in considerable need for USEPA funding to clean up environmental contamination at brownfields within the City, including the Target Brownfield. The greatest needs to be addressed with cleanup and redevelopment are (1) increased residential/worker housing options to support rebuilding the industrial sector and adjacent downtown commercial district, and (2) reducing flooding by expanding greenspace and restoring floodways at the Target Brownfield. The cleanup and redevelopment of the Target Property is consistent with community needs and will bring catalytic improvements to the quality of life in the City to address significant blight, poor economic conditions, and welfare discussed in Section 2.a.

**(ii) Description of the Proposed Brownfield Site.** Farmers in the 19<sup>th</sup> Century found the ground in the region excessively difficult to cultivate, which was met with ingenuity by a young blacksmith in Brillion who built a forge and developed the first plow specifically designed to break these hard regional soils. The blacksmith operation went bankrupt and was sold in the 1930s to Brillion Iron Works, who successfully overhauled the operations and subsequently redeveloped/expanded the business through the 20<sup>th</sup> Century to encompass 145 acres of land, with “Brillion Iron Works” operating four foundries at the Target Brownfield. At the height of operation, the foundries employed well over 1,000 people and produced up to 1,000 tons of grey ductile iron per day. Brillion Iron Works abruptly closed in 2016, vacating 145 acres of land and sending massive shockwaves through the City, Target Area, and surrounding communities. Supporting industries and a once-vibrant downtown commercial district collapsed virtually overnight. The City involuntarily acquired the Target Brownfield in 2018 and entered into a redevelopment agreement with Brillion Works, LLC (BW, LLC; herein the “developer”) with a vision to breathe new life into this blighted property. The Target Brownfield is currently vacant, and the City removed all the remaining hazardous wastes and razed the former buildings by Fall 2022.

The developer divided the Target Brownfield into six Redevelopment Areas based on the *2023 Brillion Works Reuse Plan*. The **Target Property** (“Redevelopment Area 4”) is the southern 6.3-acres of the greater 145-acre Target Brownfield. The Target Property is uniquely situated along existing roadways/infrastructure fitting for multi-family redevelopment to address housing insecurity and is located adjacent to an area ideal for reuse as greenspace to mitigate existing flooding issues in the City. The severity of subsurface impacts is defined, and in summary, soil and groundwater constituents warranting cleanup include heavy metals, polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), and polychlorinated biphenyls (PCBs). The risks to human health from identified contaminants include birth defects, cancer (liver, brain, lung), and nervous system and reproductive system damage.<sup>1</sup> The Target Property is bordered to the west by Spring Creek, which discharges to the Brillion State Wildlife Area (a 4,800-acre wetland) which drains to the Manitowoc River and ultimately flows to Lake Michigan. The proximity of contaminants at the Target Property (e.g., PCBs, metals) to the creek puts surface water quality at continued risk until cleanup occurs.

## **1.b. Project Area Description and Plans for Revitalization – Revitalization of the Target Area**

**(i) Reuse Strategy and Alignment with Revitalization Plans.** The cleanup and redevelopment of the Target Property for multi-family residential reuse is in direct alignment with community priorities and needs identified in the *2023 Brillion Works Reuse Plan* and the City’s *City of Brillion Comprehensive Plan* (collectively referred to as the “Plans”) for the Target Brownfield. The Plans were developed with input from community members during public meetings/charettes. Citizens indicated that there is a severe lack of housing in the City significantly impacting the underserved community; therefore, the proposed reuse of the Target Property is targeted towards workforce multi-family reuse. Additionally, the

<sup>1</sup> Health impacts per [www.atsdr.cdc.gov/toxfaqs/index.asp](http://www.atsdr.cdc.gov/toxfaqs/index.asp)

Select acronyms: Target Area= Block Group 2 in Census Tract 201; Target Brownfield= former Brillion Iron Works foundry; Target Property= Redevelopment Area 4 of the Target Brownfield; BAC = Brownfield Advisory Committee; RAP/MMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; [blue text](#) = hyperlinks to source material

Target Property is located in a **federally designated floodplain** and the west-adjointing Spring Creek historically floods; therefore, additional redevelopment of the Target Property for greenspace will allow for expansion of flood storage areas to mitigate flooding risk while providing expanded recreation opportunities for residents, visitors, and citizens. Multi-family residential development at the Target Property will catalyze infrastructure investment and commercial growth in downtown Brillion. In broader context, the *2023 Brillion Works Reuse Plan* includes eight large parcels targeted for commercial redevelopment. This reuse is anticipated to leverage **\$128,000,000** in private development, generate an increase of **\$2,700,000** in annual tax base, and generate 850 full-time jobs plus 640 temporary construction jobs.

**(ii) Outcomes and Benefits of Reuse Strategy.** This redevelopment will be shovel-ready following cleanup, and the Target Property is appropriately zoned for the proposed reuse. BW, LLC has executed a development agreement with the City and has completed four very successful redevelopment projects in other Redevelopment Areas of the Target Brownfield that have generated 111 full-time jobs in the Target Area since 2020: 1) a multi-story office complex (**\$3,378,486** private investment), 2) a next-generation healthcare clinic (**\$5,600,000** private investment), 3) a childcare facility (**\$3,510,119** private investment), and 4) an industrial research and design and manufacturing facility (**\$10,950,000** private investment).

With this inspirational track record of accomplishments, BW, LLC will construct a new apartment complex with 48 modern and ADA-compliant multi-family apartments at the Target Property (**\$6,500,000 to \$7,500,000** private leverage [Attachment A1] with renderings included in the Analysis of Brownfield Cleanup Analysis [ABCA] in Attachment B2). Redevelopment of the Target Property is in direct alignment with the reuse strategies outlined in the *Plans*. Construction will begin in Q1 FY2025 and incorporate energy efficiency in the building and mechanical designs, with the goal of having the buildings qualify for Leadership in Energy and Environmental Design (LEED) status. A recent study found that buildings constructed to LEED standards contributed 50% fewer greenhouse gases compared to conventional construction.<sup>2</sup> This increase in energy efficiency is an added benefit of this reuse strategy. Increased residential density will create a demand for supporting commercial uses in other portions of the Target Area. Planned future development at the greater Target Brownfield includes restaurants, industrial manufacturing, retail, and additional multi-family redevelopments. Based on USEIA’s 2021 employment estimates, redevelopment at the Target Property is estimated to generate **35 construction jobs** (five jobs per \$1,000,000 investment). The Target Property is located in a federally designated floodplain and the west-adjointing Spring Creek frequently floods; therefore, additional redevelopment of the Target Property for greenspace will allow for expansion of flood storage areas to mitigate flooding risk while providing expanded safe/healthy recreation opportunities for future residents. Climate change is expected to increase heavy rainfall events in Wisconsin; therefore, added flood storage space at the Target Property will improve local climate adaptation and resiliency.

### 1.c. Project Area Description and Plans for Revitalization – Strategy for Leveraging Resources

The City and BW, LLC have leveraged **\$632,027** in local and private funds to demolish the former buildings and complete the environmental investigation at the Target Property. USEPA cleanup grant funding in addition to the leverage described below **will be sufficient** to complete the proposed reuse of the Property. The City is eligible for and will pursue the following; the City will also support BW, LLC in pursuing external funding, where eligible:

<b>Name of Resource:</b> WDNR Wisconsin Assessment Monies	<b>Purpose:</b> 1.c.i – Site Characterization / Planning <b>Additional Details:</b> Although not anticipated, if needed, the City could secure additional grant-funded assessment work through the WDNR Wisconsin Assessment Monies program.	<b>Status:</b> Eligible; Unsecured
<b>Name of Resource:</b> Insurance Recovery	<b>Purpose:</b> 1.c.i, 1.c.ii – Remediation <b>Additional Details:</b> The City is searching old general liability insurance policies issued to a prior operator to confirm if insurance recovery could fund Remediation at the Target Property.	<b>Status:</b> Eligible; Unsecured
<b>Name of Resource:</b> BW, LLC	<b>Purpose:</b> 1.c.iii – Reuse (Construction) <b>Additional Details:</b> The developer is securing \$7,500,000 from internal funding, private investors, and a bank loan. The capital stack will be fully assembled by January 1, 2024.	<b>Status:</b> Secured (Attachment A1)
<b>Name of Resource:</b> WDOT-TEA	<b>Purpose:</b> 1.c.iii – Reuse (Construction of New Roads) <b>Additional Details:</b> A \$3,372,466 grant is earmarked from the Wisconsin DOT-Transportation Economic Assistance (TEA) program for funding to build new roads at the Target Brownfield.	<b>Status:</b> Eligible; Secured
<b>Name of Resource:</b> City of Brillion Environmental TID	<b>Purpose:</b> 1.c.iii – Reuse (Cleanup/Reuse) <b>Additional Details:</b> The City established an Environmental TID to facilitate cleanup of the Target Brownfield. The TID will start generating income, which can be used to fund future projects.	<b>Status:</b> Eligible; Applied

<sup>2</sup> <https://escholarship.org/uc/item/935461rm>

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<b>Name of Resource:</b> Fund for Lake Michigan	<b>Purpose:</b> 1.c.iii – Reuse (Reuse in Greenspace) <b>Additional Details:</b> A \$150,000 grant was awarded to the City to enhance ecosystem services of Spring Creek in the greenspace area of the Target Property.	<b>Status:</b> Secured
<b>Name of Resource:</b> Community Foundation	<b>Purpose:</b> 1.c.iii – Reuse (Reuse in Greenspace) <b>Additional Details:</b> A \$150,000 grant was awarded to the City to enhance construction of greenspace/parkland at the Target Property.	<b>Status:</b> Secured

(iv) Use of Existing Infrastructure. As a former foundry, significant electrical and natural gas infrastructure exists at the Target Brownfield. For example, the local electrical utility installed a **\$14,000,000** substation in 2016 to supply power to the former foundry. This substation has sufficient capacity to serve the proposed multi-family apartment complex for the Target Property, in addition to all the proposed reuses at the greater Target Brownfield. As noted above, the WDOT-TEA has earmarked a **\$3,372,446** grant to fund new road work at the Target Brownfield. This grant would fund the construction of 3 miles of new road infrastructure and facilitate the installation of new water and sewer utilities beneath the new roadways to satisfy the needs of the redevelopment and generate additional utility revenue for the City.

## 2.a. Community Need and Community Engagement – Community Need

(i) The Community’s Need for Funding. This grant will meet the needs of a community that has an inability to draw on other sources of local funding to conduct cleanup due to its small population and low income which is attributed to job losses and exacerbated by limited/restricted state/ local funding. The proposed City budget for 2024 is \$3.2MM. At an estimated cost of \$20,000 per acre of

	City of Brillion	City of Sherwood	Calumet County	State of WI	US
Population	3,262	3,271	52,442	5.9m	331.4m
Percent Poverty Rate (change since 2000)	<b>14%</b> (+482%)	2% (-49%)	6% (71%)	11% (27%)	12.8% <i>na</i>
Median Household Income (change since 2000 in 2023 \$\$)	<b>\$65,262</b> (-23%)	\$112,663 (-3%)	\$78,453 (-18%)	\$67,080 (-16%)	\$64.0k <i>na</i>
Single Parent Families in Poverty	<b>71%</b>	25%	31%	25%	<i>na</i>
Single Mothers in Poverty	24%	32%	30%	30%	<i>na</i>
Percent Minority (change since 2000)	6% (161%)	2% (-25%)	10% (168%)	20% (58%)	42% <i>na</i>
Percent Hispanic or Latino	4%	0.6%	5%	7%	19%
High School Graduate (only)	<b>44%</b>	27%	32%	30%	<i>na</i>
Bachelor’s Degree or Higher	<b>18%</b>	40%	30%	31%	<i>na</i>

assessment, the 145-acre Target Brownfield redevelopment would comprise almost the entirety of the City’s annual budget. Further, these municipal funds are restricted-by-law for designated purposes, and lenders would not loan for remediation without egregious interest rates/terms, creating the inability for the City to fund cleanup at this scale. Key indicators of disproportionately impacted populations compared to the County, the State, and a nearby community of similar size (City of Sherwood, 12 miles west of Brillion) are summarized on **Table 1** and reflect a steep decline in economic conditions since the first decade of the 21<sup>st</sup> Century when manufacturing was the City’s economic foundation. Specifically, largely due to the collapse of the foundry, the Target Area experienced a **23% decrease in average income, a 23% increase in single mothers in poverty, and a 482% increase in the poverty rate<sup>3</sup>** which is why this area is critical for redevelopment to address community need. Together these factors indicate a much lower than average discretionary income, which has resulted in less spending and decreased economic growth for the community. Despite the economic decline, minority populations are increasing, and the Latino population is expected to keep growing due to a relatively sizeable percentage of young persons and higher rates of immigration into the community.

**Small Population Size.** A limiting economic factor is the City’s lack of “entitlement status”; therefore, the City does not receive an annual allocation of Community Development Block Grants funds that could be a key source of cleanup funding. With a population of only 3,262 and a proposed annual (2024) budget of only \$3.2MM, the City cannot reasonably raise capital to self-fund necessary cleanup.

**Loss of Jobs.** Brillion has experienced many economic challenges over recent decades associated with globalization and its impact on the manufacturing sector, which previously provided the foundation for the City’s prosperity and main source of local jobs. Rising global competitiveness and offshoring to reduce labor costs resulted in major job losses. When the Target Property closed, the initial economic impact was the immediate loss of \$20,000,000<sup>4</sup> in tax base and

<sup>3</sup> Data from [policymap.com](http://policymap.com) based on ACS, 2017 - 2021. **Bold** indicates worse conditions than WI/US; **RED** is worse than or equal to WI/US and the County. *na* = data not available

<sup>4</sup> <https://www.calumetcounty.org/AgendaCenter/ViewFile/Minutes/05112017-761>

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the loss of the City’s largest public water user. The regional economic impact (outside of the City) of closing the foundry was conservatively estimated at a \$27,000,000 loss.<sup>5</sup> This loss in economic strength resulted in decreases in local tax revenue that would otherwise be available to assist the necessary cleanup at the Target Property.

**Poor Economic Condition.** The vast majority of households in the City rent. The average income of renters in the City is \$32,082 (compared to \$34.5k in Sherwood and \$39k in the County) and renters in the City are using 27% of their income to pay rent. With the average rent increasing 26% in the past five years<sup>3</sup> combined with high food costs (estimated \$1,050 for a family of 4), it is clear that the housing burden is a significant contributor to the skyrocketing poverty rates in the Target Properties (especially for single mothers and elderly).

**Limited City/State Funding.** To date, the City has spent **\$3,000,000** (including fully spending a \$2MM Environmental TID) on acquisition, asbestos abatement, building demolition, and environmental assessment work at the Target Brownfield. For scale, this investment is equal to the **entire** City budget for a year; as such, the City simply does not have capacity to self-fund the necessary cleanup to facilitate the proposed reuse at the Target Property. Directly impacting local tax revenue, the fair market value of residential properties in the City within 1,000 feet of a brownfield have **decreased by 21%**. The decrease in property value due to the presence of brownfields undoubtedly reduces tax revenue that could be used to fund brownfield assessment and cleanup. Due to extraordinarily complicated eligibility thresholds, the project is not eligible for a grant under the State brownfield cleanup program. As such, the City desperately needs cleanup funding through the USEPA Brownfield program to facilitate multi-family and greenspace reuse of the Target Property.

(ii.1) Threats to Sensitive Populations – Health or Welfare of Sensitive Populations. There are **numerous** residential parcels within 500 feet of the Target Property. The Brillion Public Library, Horn Park, a daycare, and a health clinic are also located within 500 feet of the Target Property, which puts sensitive groups more susceptible to impacts at substantial risk from brownfields. As noted in Section 2.a.i and further summarized on **Table 2**, the USEPA Environmental Justice Screening (EJScreen) tool noted the demographic index of the Target Area ranks in the upper 63<sup>rd</sup> percentile compared to the State due largely to the high percentage of low-income populations, suggesting a high exposure risk to sensitive populations. EJScreen indicates the Target Area ranks in the 77<sup>th</sup> percentile in the State for low income, and in the 91<sup>st</sup> percentile for low education level<sup>3</sup>. As noted on **Table 1** in Section 2.a.i, the rate of children in poverty in the Target Area is double the rate of the rest of the County and higher than the State. Single parents with children in the Target Area are likely to be living in poverty and multi-generational poverty is difficult to overcome. Further, 27% of people over 65 live in poverty, which is a 295% increase since 2000<sup>3</sup> and more than triple the County and State poverty rates for the elderly (**Table 3**). Key welfare issues to the sensitive populations include: lack of affordable and safe/healthy housing; lack of diverse commercial amenities providing jobs and contributing to the community; and the quality of life for children and the elderly.

Table 2. Sensitive Population <sup>6</sup>	Target Area (%ile in State)
Demographic Index	63
Low Income	77
< HS Education	<b>91</b>
Under 5 Years Old	71
Over Age 64	68

Table 3. Sensitive Population <sup>3</sup>	City of Brillion	City of Sherwood	Calumet County	State of WI
Elderly (65 and older)	<b>19</b>	14	15	17
Elderly in Poverty	<b>27</b>	1	8	8
Disabled	<b>9</b>	7	9	12
Disabled in Poverty	<b>24</b>	0	22	20
Children (< 5 years)	<b>6</b>	6	5	5
Poverty rate for children	5	15	7	15

**Lack of Healthy Housing:** A significant need in the region is healthy workforce and LMI housing. Housing stock is very old in the Target Areas (74% of homes constructed prior to the ban on consumer lead paint in 1978) which impacts children in the area and complicates finding healthy housing. Further, the median home value in CT-5 (\$135k) is 2/3 of the State median confirming that finding healthy housing, especially for single mothers with children in poverty, is an unsurmountable challenge. The Census Bureau estimates that upwards of 40% of homeowners and 60% of renters are burdened by housing costs. This unfortunately forces sensitive populations to residential areas similar to those adjacent to the priority sites where lead based paint is present.

**Improve Welfare.** Cleanup and redevelopment of the Target Property for residential and green space will improve welfare conditions by increasing healthy housing, decreasing contaminant source areas, and making the surrounding neighborhoods safe and walkable. Overall well-being will be increased by increased recreation in new greenspace areas.

<sup>5</sup> <https://www.postrescent.com/story/news/local/2016/10/04/outreach-iron-works-workers-full-swing/91470464/>

<sup>6</sup> <https://ejscreen.epa.gov/mapper/>. **RED** indicates greater than the 90<sup>th</sup> Percentile & **BOLD** indicates greater than 70<sup>th</sup> Percentile compared to the State of Wisconsin. Select acronyms: Target Area= Block Group 2 in Census Tract 201; Target Brownfield= former Brillion Iron Works foundry; Target Property= Redevelopment Area 4 of the Target Brownfield; BAC = Brownfield Advisory Committee; RAP/MMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; [blue text](#) = hyperlinks to source material

(ii.2) Threats to Sensitive Populations – Greater than Normal Incidence of Disease and Adverse Health Conditions.

**Asthma.** The 2022 USEPA Toxics Release Inventory for the City indicates 71,000 pounds of toxic chemical waste was generated at 2 regulated facilities.<sup>7</sup> Air quality is significant, and although no monitoring locations are located in the County, data from the American Lung Association *State of the Air* (2023) report gives an adjacent county an “C” for air quality due to ozone<sup>8</sup>. Although data is not available for the Target Area, the percentage of children in Calumet County with asthma is slightly less than the National Average<sup>9</sup>; however, the adult rate of asthma is **55% greater** in Calumet County compared to the National average.<sup>9</sup> Undoubtedly, poor air quality has a disproportionate impact on sensitive populations (**Table 7**), and with the change in weather patterns in Calumet County due to climate change, poor air quality days are increasing yearly.

**Childhood Disabilities.** Although data is not available for the City, the US Census Bureau<sup>10</sup> notes the rate of childhood (age <18 years) cognitive disability in the County is more than double (11.3%) the rate in Wisconsin (4.4%) and in the US (4.1%) and the overall rate of disability in the Target Areas (19%) exceeds the rate in Wisconsin (12%). Although the precise cause/source of cognitive disabilities in children is likely due to a multitude of factors, known/suspect contaminants of concern identified at the Target Property (Section 1.a.ii) are known to cause severe neurological damage and birth defects. Children could be exposed to these constituents through consumption of impacted groundwater (in both public and private wells), which is known to be an issue in the County.

**Birth Defects.** Birth defect rates are not available for the Target Area. Wi. Dept of Health County Profile indicates the rate of congenital anomalies in the County is 0.6%, which is greater than the adjacent County. The March of Dimes indicates County is a “maternity desert”<sup>11</sup> as there are no hospitals providing obstetric care, no birth centers, no OB/GYN and no certified nurse midwives in the County, indicating expecting mothers must travel long distances access healthcare.

**Overall Health and Cancer Rates.** Although data for the City is not available, the 2021 Population Health Institute at the University of Wisconsin<sup>12</sup> ranked Calumet County 53 out of 72 Counties in the State for overall health based on characteristics associated with sensitive populations: morbidity (which included self-reported fair or poor health, poor mental health days, and percent of births with low birth weight); social and economic factors (which included measures of education, employment, income, family and social support, and community safety); and physical environment (which included many EJ parameters). Obesity remains a significant challenge in Calumet County and the City, with 18% of the low-income preschool children considered obese and 36% of the adult population considered obese, which places the County in the highest quartile compared to other counties in the State. The most current report from the Population Health Institute at University of Wisconsin<sup>12</sup> indicates the County ranks below the State for health based on characteristics associated with sensitive populations: lower number of primary care physicians, dentists, and mental health providers, higher healthcare costs and increased rates of adult obesity, physical inactivity, excessive drinking and alcohol-impaired driving deaths. The EJScreen tool ranks the Target Area in the upper 65<sup>th</sup> percentile for cancer risk due to inhalation of air toxics, which could partially explain why the Wisconsin Dept. of Health County Profile indicates the upper confidence interval for age-adjusted cancer rates in the County for female breast, melanoma, colorectal, lung and bronchus, and prostate cancers are all greater than the State. Further, as described in 2.a.ii.1, poor groundwater quality is a known risk in the community which could also explain the poor health outcomes of the population.

**Reduction of Health Risk.** Cleanup and redevelopment of the Target Property will mitigate these health conditions by decreasing contamination mass and source areas; improving ground water quality; and increasing opportunities for healthy living as summarized in Section 1.b(ii) by creation of bike trails, river access, increased healthy housing; and increased alternative energy/transportation options.

(ii.3.a) Environmental Justice (EJ) - Identification of EJ Issues. In combination with zoning, persistent policies and questionable industrial operators have historically disproportionately impacted the community. The City’s legacy of heavy industrial activity and associated pollution has resulted in a disproportionate burden to sensitive populations (women, elderly, and children). Those lacking formal education, single mothers in poverty, and children in poverty are especially threatened. **Table 4** summarizes EJ negative impacts in the Target Area and in a community disproportionately burdened with poor air quality (e.g., National Air Toxics Assessment [NATA]; particulate, and ozone indices), increased risk to children from lead exposure in housing (lead paint indicator), and abundant risks to water quality (wastewater discharge indices).

<sup>7</sup> <https://www.epa.gov/toxics-release-inventory-tri-program>

<sup>8</sup> <https://www.stateoftheair.org/city-rankings/states/wisconsin/calumet.html>

<sup>9</sup> <https://www.cdc.gov/asthma/national-surveillance-data/asthma-prevalence-state-classification.htm> and <https://www.cdc.gov/asthma/nhis/default.htm>

<sup>10</sup> <https://data.census.gov/cedsci/>

<sup>11</sup> <https://www.marchofdimes.org/research/maternity-care-deserts-report.aspx>

<sup>12</sup> <https://uwphi.pophealth.wisc.edu/>

<b>Table 4. EJ Index Percentile (CT-201 compared to State)</b> (% in WI with lower risk vs. target neighborhoods) <sup>5</sup>	<b>Target Property</b>
EJ Index - Air Toxics Respiratory Hazard Index	60
EJ Index - NATA Air Toxic Cancer Risk	65
EJ Index – Toxic Releases to the Air	53
EJ Index - Particulate Matter	54

<b>Table 4. EJ Index Percentile (CT-201 compared to State)</b> (% in WI with lower risk vs. target neighborhoods) <sup>5</sup>	<b>Target Property</b>
EJ Index - Ozone	56
EJ Index - Lead Paint Indicator	69
EJ Index – Superfund Proximity	54
EJ Index - Wastewater Discharge	78

**Climate and Economic Justice.** Environmental justice issues facing the Target Area are summarized on **Table 4**, and when considered in light of the community need/demographics summarized in Section 2.a.ii.1, it is surprising that the Climate and Economic Justice Screening Tool<sup>13</sup> (CEJST) does not identify the Target Area (CT-201) as disadvantaged for sustainable housing. And given that flooding is a significant risk/cost to the community combined with the anticipated increase in flooding due to climate change, it is surprising CT-201 is not identified as such on the CEJST tool. This lack of acknowledgement is likely due to the abundant agricultural land in CT-201 (calculated to be 87% of developed land)<sup>14</sup>, which has biased the statistics used to calculate this metric. As such, the CEJST tool is not adequately diagnosing the need in the community. Although data is not available for CT-201 or the City, given the abundance of agricultural land uses, it is not surprising that the percent of wells with significant nitrate contamination in the County is 10-times that of the adjacent county, which is a significant EJ issue. The frequency of emergency room visits due to carbon monoxide poisoning in the County is double the rate of the adjacent county, which could be due to lack of maintenance of home heating systems due to limited personal finances. Given the economic condition of the community (**Table 1**), the challenges of the sensitive population (**Table 2** and **Table 3**) in combination with the EJ Index (**Table 4**), the City is clearly an example of a rural community facing significant climate and economic justice issues.

(ii.3.b) **EJ – Advancing EJ.** Legacy immigration and minority housing policies (e.g., redlining) created highly segregated communities in the upper Midwest.<sup>15</sup> Cleanup and redevelopment of the Target Property will advance the *Path to Achieving Justice40 Initiative* in the disproportionately impacted underserved community by creating healthy livable/walkable neighborhoods with increased healthy housing and promoting alternative transportation, which will improve air quality by decreasing diesel particulates, air toxins, and ozone. Increasing housing security and building healthier communities are directly associated with decreased crime rates and increase in quality of life. In addition, cleanup at the Target Property will include climate resilient remedial solutions to preserve flood storage while mitigating subsurface impacts to Spring Creek, which is a tributary to the Manitowoc River. Redevelopment is specifically targeted to multi-family housing; therefore, displacement of the underserved community is not anticipated; however, the City will work to minimize displacement through multiple problem solving meetings and a Community Benefit Agreement.

## 2.b. Community Need and Community Engagement – Community Engagement

(i) **Project Involvement and (ii) Project Roles.** The Brillion Brownfields Advisory Committee (BAC) has been developed to provide oversight/input on the City’s Brownfields program. BAC members will bring important community voices to the table and were selected to address needs discussed in Section 2.a. The general public and those affected directly by the Target Property will be engaged through a Community Involvement Plan (CIP) to be developed in Fall 2024 in collaboration with the BAC, as described in 2.b.iii. Members on **Table 5** affirm their commitment to serve on the BAC.

**Table 5. Members of the Brillion Brownfields Advisory Committee**

<b>Organization (focus)</b>	<b>Point of Contact</b>	<b>Partner Role / Specific Expertise on BAC</b>
Brillion Chamber of Commerce	Tami Gasch, President 920-427-9926 info@brillionchamber.com	Facilitate successful reuse of the Target Property by identifying and finding resources to encourage commercial businesses to locate/build at the Brillion Iron Works property to create jobs.
Habitat for Humanity (non-profit)	Amy McGowan; Director of Development; 920-954-8702	Provide guidance on redeveloping brownfields in Target Area for residential reuse.
Sarah Pielhop (Community Member At Large)	920-756-2102; sarah@pielhopwieting.com	Local business owner and Brillion resident with experience acquiring and redeveloping brownfields in Brillion; provide community input
Community Foundation for the Fox Valley Region (non-profit)	Ann Engelhard; 920-702-7627; aengelhard@cffoxvalley.org	Community outreach organization working with families on health/well-being issues
USEPA and WDNR Project Managers	<b>To Be Determined</b> - Provide technical assistance and review of work products in Tasks 1, 2, and 3; outlined in Section 3; (e.g., QAPP, SSSAP, RAP/MMP, Construction Documentation Report)	

<sup>13</sup> <https://screeningtool.geoplatform.gov/>

<sup>14</sup> USDA, National Land Cover Data Set (NLCD), 2019

<sup>15</sup> <https://mapmaker.nationalgeographic.org/map/10f16803d86a4e3d94966ca4659caac0?lat=30.7639&lon=-105.2984&zoom=3>

Select acronyms: Target Area= Block Group 2 in Census Tract 201; Target Brownfield= former Brillion Iron Works foundry; Target Property= Redevelopment Area 4 of the Target Brownfield; BAC = Brownfield Advisory Committee; RAP/MMP = Remedial Action Plan/Material Management Plan; ABCA = Analysis of Brownfield Cleanup Alternatives; CIP = Community Involvement Plan; WDNR = Wisconsin Department of Natural Resources; [blue text](#) = hyperlinks to source material



Organization ( <i>focus</i> )	Point of Contact	Partner Role / Specific Expertise on BAC
The Health Officer of the Calumet County Health Department. (Zak Van Ooyen; 920-849-1432) will attend BAC meetings and community outreach meetings to answer any health-related questions/concerns related to the cleanup.		

(iii) Incorporating Community Input. Community outreach activities were bolstered during preparation of the 2023 *Brillion Works Reuse Plan* through workshops and questionnaires. Within one month of award, the City (grantee) will develop a site-specific CIP to leverage the expertise and networks of the BAC (members listed in 2.b.i and 2.b.ii). The CIP will be designed specifically to engage and inform the community members and to provide an avenue for input/feedback from the community. The CIP will also discuss how community input will be considered and responded to. The approved CIP will be implemented in Fall 2024 to integrate community involvement utilizing the BAC to engage the community and local businesses in the assessment, cleanup, and overall redevelopment of the Target Property. The timeline for community meetings will be outlined in the CIP. The City (grantee) will hold at least one meeting per quarter and at key points during the project, including: (A) a meeting after grant award to discuss the project/grant with the community, the project process and expectations, and timeframe of key activities; (B) a meeting upon posting of the final ABCA; (C) a meeting when cleanup activities begin; (D) periodic meetings during active cleanup; and (E) a final meeting when cleanup is complete.

In-person and virtual outreach options will be provided and are well-accepted by the community. Community meetings will be held in the evenings to accommodate work schedules of stakeholders. In addition, meetings will be held at City Hall, which is within walking distance of the Target Property. The meeting facility will be ADA-compliant to accommodate needs of sensitive populations (i.e., disabled or elderly). Hard copies of all project outputs will be made available at City Hall.

The CIP will include a variety of socially-distanced engagement practices, including expanding virtual tools (e.g., online meeting platforms, social media, and webpage/email updates). As renderings are developed, the local newspaper will likely be a significant source of information dissemination. Displays of Target Property renderings at the summer farmer's market will also allow socially-distanced feedback. QR Codes on posters will allow for direct, immediate feedback on the project.

Although it is anticipated that most communications will be in English, it is important that non-English speaking households are aware of environmental activities that directly impact them. Thus, the City will work with the project partners to develop and distribute information in Spanish, as well as offer translation and interpretation services as needed. Spanish speakers will be reached through the regional Spanish radio station (92.7 FM) and translated materials provided through local retailers frequented by these target groups (e.g., churches, laundromats, and retail outlets).

### **3.a. Task Descriptions, Cost Estimates, and Measuring Progress – Proposed Cleanup Plan**

Contaminated Media to be Addressed: Hazardous substances (e.g., VOCs, PAHs, PCBs, and heavy metals) were detected in soil, fill and/or groundwater at the Target Property at concentrations significantly greater than applicable health-based direct contact soil quality standards, rendering the Target Property unsuitable for multi-family redevelopment until appropriate cleanup activities occur. Soil impacts targeted for active remediation are associated with use of foundry sand and slag as fill at the Target Property, and from apparent discrete liquid releases during prior industrial operations. Associated impacts to soil vapor are imminent and will require mitigation to prevent vapor intrusion into the multi-family residential buildings. This cleanup plan is consistent with the reuse *Plans* guiding redevelopment.

Reuse Plan. As WDNR has previously approved the RAP/MMP for the Target Property, work can begin immediately upon award. Initial tasks will be adapt, update and finalize the Quality Assurance Project Plan (QAPP), and complete waste characterization sampling to develop waste profiles for landfill concurrence for offsite disposal. The selected remedial approach to be completed by appropriately licensed/certified remedial contractors, with work overseen by the Qualified Environmental Professional (QEP) firm and regulatory agencies (USEPA and WDNR) under this grant include: (1) Excavation and offsite disposal of impacted foundry sand/slag fill and impacted soil from the public greenspace area; (2) Importing clean fill and constructing a vegetated engineered barrier spanning the public greenspace area; (3) Establishing institutional controls/continuing obligations in the public greenspace area; (4) Importing clean fill and constructing a soil engineered barrier in the multi-family residential area; and (5) Designing sub-slab depressurization systems (SSDSs) for the multi-family buildings. Construction of the SSDSs, establishing institutional controls, and implementing plans to provide for long-term control of residual soil, groundwater and/or soil vapor impacts at the multi-family redevelopment area will be the responsibility of the developer post-cleanup.

Disposal Requirements: Impacted soil/fill will be reused onsite to the greatest extent possible. Soil unsuitable for reuse onsite passes TCLP and can be managed as a solid waste and transported/disposed of at a local licensed solid waste landfill. The scope and budget described in Section 3.b - 3.c assume the majority of removed soil can be used by the landfill for beneficial reuse.

This proposed cleanup plan is designed to execute the vision of the *Plans* for the Target Area by addressing the contaminated media present on the Target Property to prepare it for multi-family redevelopment and public use/flood water storage in a manner that is economical and promotes environmental/community health and quality of living.

**3.b.i – 3.b.iv Task Descriptions, Cost Estimates, and Measuring Progress – Description of Tasks/Activities and Outputs.** The City has developed the appropriate tools and procedures to immediately begin implementation of the grant. The City will retain a QEP consulting firm per 2 CFR 200.317-200.326 and 2 CFR 1500. This shovel-ready cleanup project will be completed in 24 months (estimated Q4 FY2026), as reflected in the task descriptions below.

<b>Task 1 - Activity: Program Management</b>	
i. <b>Project Implementation:</b>	Procure QEP; prepare Quarterly Reports, Annual Financial Reports, and MBE/WBE Reports; update ACRES database; prepare Grant Closeout Report.
ii. <b>Anticipated Project Schedule:</b>	QEP procured by Nov 1, 2024. Quarterly Reports will be submitted by Jan. 30th, April 30th, July 30th, and Oct. 30th of each year, with the first due on Jan. 30, 2025. Annual Disadvantaged Business Enterprise (DBE) reports will be submitted by Oct. 30th, with the first due on Oct. 30, 2025. Grant closeout expected Q1 FY2027.
iii. <b>Task/Activity Leads:</b>	City Project Manager (PM) and City Project Coordinator (with input from QEP).
iv. <b>Outputs:</b>	Admin Records; Contractor Procurement Documentation; (4) Quarterly Reports; (1) Annual Financial Report; (1) MBE/WBE Report; (1) Grant Closeout Report. # of outputs assumes schedule holds.
<b>Task 2 - Activity: Cleanup Oversight</b>	
i. <b>Project Implementation:</b>	Finalize ABCA; adapt QAPP for the project; complete waste characterization sampling to develop waste profiles; develop bid specifications, retain remedial contractor, oversee cleanup activities, design SSDS, Davis-Bacon Act (DBA) compliance, prepare Construction Doc. Report (CDR) following completion of Task 3.
ii. <b>Anticipated Project Schedule:</b>	Finalize ABCA, adapt QAPP, and complete waste characterization sampling (Q1 FY2025) to develop waste profiles for WDNR and landfill approvals (Q1FY2025); develop bid specifications, retain remedial contractor, and implement cleanup plan (Q1 FY2025); complete DBA compliance documentation concurrent with oversight of Task 3 (Q3 FY2025 – Q4 FY2026); prepare CDR and design SSDS (Q4 FY2026).
iii. <b>Task/Activity Leads:</b>	City PM and QEP, with input from WDNR and USEPA PMs.
iv. <b>Outputs:</b>	ABCA; QAPP; waste profiles; bid specifications; DBA Summary; CDR; SSDS design.
<b>Task 3 - Activity: Cleanup (Remediation Contractor Only)</b>	
i. <b>Project Implementation:</b>	Implement cleanup plan described in Section 3.a.
ii. <b>Anticipated Project Schedule:</b>	Q1 FY2025 through Q4 FY2026.
iii. <b>Task/Activity Leads:</b>	City PM, remedial contractor(s) PM(s) (to be retained in Q1 FY2025), and QEP PM.
iv. <b>Outputs:</b>	Daily construction logs; landfill tickets.
<b>Task 4 - Activity: Community Outreach</b>	
i. <b>Project Implementation:</b>	Prepare and implement a Site-Specific CIP. Host quarterly public meetings to discuss Target Property cleanup and redevelopment plans; community events; present at National Brownfield Conference.
ii. <b>Anticipated Project Schedule:</b>	First meeting Q1 FY2025, then quarterly; Brownfield Conference in 2025.
iii. <b>Task/Activity Leads:</b>	City PM and BAC, with input from QEP.
iv. <b>Outputs:</b>	CIP, meeting deliverables, reuse plans, presentation materials

**3.c. Task Descriptions, Cost Estimates, and Measuring Progress – Cost Estimates.** Personnel (\$38/hr) and fringe (\$12/hr) are an average of City staff. Contractual and construction estimates are based costs realized under the City's FY19 USEPA Brownfield cleanup grant, which was subject to DBA requirements. This shovel-ready project will be complete in 24 months (estimated Q4 FY26), as reflected in the budget below.

Budget Categories		Task 1	Task 2	Task 3	Task 4	Total
		Program Management	Cleanup Oversight	Cleanup	Community Outreach	
Direct Costs	Personnel	\$5,776	\$3,800		\$3,648	\$13,224
	Fringe	\$1,824	\$1,200		\$1,152	\$4,176
	Supplies				\$2,450	\$2,450
	Travel				\$3,100	\$3,100
	Contractual	\$6,000	\$ 97,700		\$5,500	\$109,200
	Construction			\$362,000		\$362,000
	Other (WDNR Fees)		\$5,850			\$5,850
<b>TOTAL BUDGET</b>		\$13,600	\$108,550	\$362,000	\$15,850	\$500,000

**Task 1 – Program Management: Total Budget = \$13,600**

**Cost Basis and Assumptions:** Personnel/Fringe Costs of \$7,600 are budgeted for an estimated 152 hours (@ \$50/hr) of work by the City PM and staff to manage the cooperative agreement as follows: procure QEP and manage QEP activities (4hr/month=96hr); preparation of quarterly reports and maintenance of the ACRES database (3hr/quarter=24hr); annual financial and DBE reporting (8hr/year=16hr); and prepare grant closeout report (16hr). Contractual Costs of \$6,000 are budgeted for an estimated 48hr (@ \$125/hr) of work by QEP in providing assistance in completing various required reports.

**Task 2 – Cleanup Oversight: Total Budget = \$108,550**

**Cost Basis and Assumptions:** Personnel/Fringe Costs of \$5,000 are budgeted for an estimated 100hr (@\$50/hr) of work by the City PM and staff for developing and issuing bid specs (40hr); reviewing project deliverables (20hr); and coordination during onsite field work (40hr). Other “WDNR fees” for regulatory oversight reviewing project deliverables is \$5,850. Contractual Costs of \$97,700 are budgeted for: finalizing ABCA, adapting QAPP, and completing pre-remedial design waste characterization sampling (\$19,700, includes driller and lab costs); design and bid specs (120hr @ \$150/hr); contractor oversight (20days @ \$1,500/day); preparing a CDR, institutional controls, and continuing obligations in the public greenspace area (100hr @ \$150/hr); and SSDS design for multi-family residential buildings (100hr @ \$150/hr).

**Task 3 – Cleanup: Total Budget = \$362,000**

**Cost Basis and Assumptions:** Construction Costs of \$362,000 are budgeted for: excavation and offsite disposal of foundry sand from the greenspace area (3,000 yd<sup>3</sup> @ \$60/yd<sup>3</sup>); construction of an engineered barrier in the greenspace area (5,400 yd<sup>3</sup> @ \$20/ yd<sup>3</sup>); and construction of an engineered barrier at the apartment project (3,700 yd<sup>3</sup> @ \$20/ yd<sup>3</sup>).

**Task 4 – Community Outreach: Total Budget = \$15,850**

**Cost Basis and Assumptions:** Personnel/Fringe Costs of \$4,800 are budgeted for an estimated 96hr (@\$50/hr) of work by the City PM and staff (12hr/quarter @ \$50/hr) for planning/hosting outreach activities. Supply Costs of \$2,450 are budgeted for printing costs (\$1,500) and mailing costs for public notices (\$950). Travel Costs of \$3,100 are for (2) City staff to attend the three-day National Brownfield Conferences in 2025: \$1,560 for meals and for lodging (@\$260/person/night); \$700 for registration (@\$350/person); \$700 for air travel (@\$350/person); and \$140 for ground transportation (@ \$70/person). Contractual Costs of \$5,500 are budgeted for an estimated 44hr of work by the QEP (@ \$125/hr) to prepare a site-specific CIP and assist with outreach activities.

**3.d. Task Descriptions, Cost Estimates, and Measuring Progress – Plan to Measure and Evaluate Environmental Progress and Results.** Project results/outputs and outcomes will be tracked, and progress measured/evaluated **weekly** using existing tools developed by the City and summarized in quarterly progress reports and annual financial reports prepared during the project under Task 1 described in Section 3.b-3.c. Project **outputs, progress, and schedule will be tracked continuously using Microsoft Project** to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. For measuring and evaluating progress, outputs will be compared to the project schedule proposed in Section 3.b; if a deviation of more than one fiscal quarter is reached, interventions (ex. increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones, deliverables, and leveraged resources will further be tracked on a **monthly/quarterly** basis in the ACRES database to further measure progress. Project-specific outcomes will be tracked/quantified in the final progress report by comparing future community demographics/welfare characteristics to current conditions and will include: (1) increase in shovel-ready portions of the Target Property suitable for multi-family residential redevelopment and (2) leveraged investment in the Target Property. Outcomes advancing the City’s *Plans* and Target Brownfield objectives include: (1) increase in developer interest in other portions of the Target Brownfield, and more broadly, (2) increase in property values in the vicinity of the Target Property. If the timelines for advancing one or more phases of work at the Target Property are not well-aligned with the USEPA grant project period, the City and QEP will work with USEPA and WDNR to adjust the approach to maintain progress on achieving the project outcomes. Outcomes will be **tracked long-term** on a five-year basis by the City and reported in future brownfield conferences, fact sheets and/or on the City website.

**4.a. Programmatic Capability and Past Performance – Programmatic Capability**

**(i) Organizational Structure.** This grant will be managed by the same high-performing team of City staff members who established the City’s Brownfields program and **timely and successfully** expended USEPA FY2019 cleanup grant funds through technical, administrative and financial prowess. The City will retain a QEP consulting firm per the requirements of 2 CFR 200.317 - 200.326, if the grant is funded. The City will also use the expertise of the BAC, WEDC, and USEPA to provide guidance and marketing to promote reuse of the Target Property.



(ii) Description of Key Staff.

**Ms. Patty Schreiber**, Administrator Clerk/Treasurer, served as the Brownfield Project Manager for the City’s high performing and highly successful FY2019 USEPA Brownfield Cleanup Grant, which leveraged over \$10,000,000 in private investment in Redevelopment Areas 1, 2, and 3 at Target Brownfield. Ms. Schreiber will serve as the Brownfield Project Manager for this project to leverage lessons learned while ensuring the timely and successful expenditure of funds to complete all technical, administrative, and financial requirements of the grant. In this role, Ms. Schreiber will be responsible for project performance and coordination with USEPA and WDNR and will provide financial tracking and grant documentation support to ensure that grant requirements are met. Ms. Schreiber has over 10 years of business and municipal project/financial management and is well-suited to continue to lead redevelopment efforts at the Target Brownfield.

**Mr. Andrew Maertz**, Public Works Supervisor, will function as the Brownfield Project Coordinator for this project and will support Ms. Schreiber in coordinating work with the QEP and other City departments. As a lifelong resident of the area, Mr. Maertz is deeply committed to the community. Mr. Maertz has served on the Reedsville Public School Board since 2008, as well as the board of control for The Cooperative Educational Service Agency #7, Wisconsin Association of School Boards, Wisconsin School Music Association, and serves as a director of numerous other regional and statewide associations.

In the event of future personnel turnover, the planned “team” approach will prevent any interruptions with the implementation of the project. Mr. Maertz will be involved in daily grant operations and can immediately step in as either interim or replacement project manager in the case of loss/reassignment of the active Brownfield Project Manager. Ms. Schreiber and Mr. Maertz will be supported by the City administrative support staff.

(iii) Acquiring Additional Resources. The City routinely hires subcontractors and consultants to support municipal projects and will continue to do so in support of cleanup and redevelopment at the Target Property. As a small community, the City does not have a program to specifically promote local hiring/procurement to directly link members of the community to brownfield redevelopment work. However, the City will retain a remedial contractor under this grant per 2 CFR 200.317 - 200.326 and 2 CFR Part 1500. The City will additionally utilize the support of local community members comprising of the BAC, as well as the WEDC and USEPA for guidance throughout the course of the project.

**4.b. Past Performance and Accomplishments – Previously Received a USEPA Brownfields Grant.**i) USEPA Brownfield Cleanup Grant for Hazardous Substances (FY2019; \$500K)

1. Accomplishments: The City exceeded performance expectations by making 13.2 acres ready for reuse while leveraging \$10,000,000 in private investment at three Redevelopment Areas in the Target Brownfield. Work included remedial design sampling, construction of 2 acres of soil engineered barriers, remedial/reuse planning, and removal of a large underground storage tank formerly abandoned in place. These accomplishments were critical for the community by removing contamination, preventing contact with contamination, and providing a seed for future development interest by making these areas shovel-ready. Achievements are accurately reflected in ACRES.

2. Compliance with Grant Requirements: The City maintained compliance with the workplan/schedule and the terms/conditions of the cooperative agreement. The City submitted the required annual financial reports, quarterly reports, and project deliverables in a timely manner per the workplan and cooperative agreement schedule. The City kept the ACRES database up to date during the grant performance period. The closeout report was submitted on schedule. No funds remained when the final report was submitted.



## ATTACHMENT B: THRESHOLD CRITERIA RESPONSES

**Name of Applicant:** City of Brillion, Wisconsin

### 1. Applicant Eligibility

The City of Brillion, Wisconsin (City) is a “general purpose unit of local government” as that term is defined in 2 CFR 200.64 and is therefore eligible to receive a USEPA cooperative assessment agreement.

### 2. Previously Awarded Cleanup Grants

Redevelopment Area 4 of the Brillion Iron Works Redevelopment (the proposed Target Property) has not received funding from a previously awarded USEPA brownfields cleanup grant.

### 3. Expenditure of Existing Multipurpose Grant Funds

The grant applicant does not have an open USEPA Brownfields Multipurpose Grant; therefore, this threshold criteria does not apply.

### 4. Site Ownership

The Target Property was acquired by the City on October 2, 2018 for the purpose of blight elimination. If awarded, the City will retain ownership of the Property for the duration of the time in which Brownfield cleanup grant funds are disbursed.

### 5. Basic Site Information

**Property Description:** The Target Property is the fourth redevelopment area delineated within the Brillion Iron Works Redevelopment Project and consists of all or portions of three contiguous parcels (Parcels 15009, 15095, and 15310) of land totaling 6.3 acres.

**Property Name:** Redevelopment Area 4 of the Brillion Iron Works Redevelopment

**Property Address:** Park Avenue and North Parkway Drive; Brillion, Wisconsin 54110

**Property Coordinates:** 44.178046, -88.060033

### 6. Status and History of Contamination at the Site

(a) Site Contamination: The Target Brownfield Property is impacted by hazardous substances associated with the placement/burial/use of foundry sand and slag as fill in addition to discrete liquid spills of hazardous substances and petroleum associated with prior industrial operations.

(b) Operational History and Current Use of the Site:

**Historical Property Uses of the Brillion Iron Works Redevelopment Area (19<sup>th</sup> Century through 2016).** Brillion was first settled in the mid-to-late 19th Century, with municipal services (including electricity, telephone, water works and plumbing) introduced in the late 19th Century and early 20th Century. Brillion was incorporated as a village in

1844 and then as a city in 1944 (Legacy Architecture, Inc., 2019). Rail services were first introduced to Brillion in 1872, and a spur through the Brillion Iron Works Redevelopment area (through PIN 153102) was constructed when the Chicago and Northwestern Railroad purchased the railroad in 1893 (Legacy Architecture, Inc., 2019). The rail line within the Brillion Iron Works Redevelopment area was removed by 2001.

The Brillion Iron Works Redevelopment was first developed with a 1.5-story machine shop and forge near the intersection of Park Avenue and North Francis Street in 1900 with immediate access to the Chicago and Northwestern Rail line (Legacy Architecture, Inc., 2019). Brillion Iron Works (as it was named for much of its history under varying ownership) expanded through the 20th Century to include several distinct plants (Plant 1 through Plant 4), along with the acquisition of several smaller outbuildings across the 145-acre property, including a former cannery on the north end of the site along Highway 10 and a former milk condensery at the target Property. Though repurposed through the years, general operations at these plants are summarized below (Legacy Architecture, Inc., 2019):

At its peak in the late 20th Century, Brillion Iron Works employed over 1,000 people and produced up to 1,000 tons of iron per day (Legacy Architecture, Inc., 2019). The foundry closed in 2016.

**Historic Property Uses of the Target Property; 19<sup>th</sup> Century through 2016.**  
Railroad Use (Parcel 15310). As noted previously, a rail spur was constructed through the Brillion Iron Works Redevelopment area via PIN 15310 by the Chicago and Northwestern Railroad in 1893. The spur was subsequently removed by 2001.

Condensery and Truck Scale (Parcel 15095 and 15009). A condensery serving 125 dairy farms in the area was built on the northeastern portion of the Property on parcel 15095 by Nestle Foods Company in 1922. Brillion Iron Works purchased the condensery in 1953 and subsequently used it as a small maintenance/storage facility (Legacy Architecture, Inc., 2019). By 2001 an asphalt parking lot was constructed in the central portion of the Property, and by 2006 a truck scale was constructed on the north end of the Property on parcel 15009.

Electrical Substation (Parcel 15095). An electrical substation operated by Wisconsin Public Service (WPS) was constructed on the southwest portion of the Property by 1966 and appears to have decommissioned/razed and the area graded/vegetated by 2017.

### **Current Property Ownership and Use.**

Ownership. The Target Property was acquired by the City on October 2, 2018 for the purpose of blight elimination.

Current Use. The asphalt paved parking lot, the truck scale, and former condensery building were demolished in Fall 2022 to prepare the Property for non-industrial reuse. The Property was grubbed and trees removed and finished in turf grass as an interim measure until non-industrial redevelopment begins in 2024.

(c) Environmental Concerns: Multiple phases of due diligence have occurred at the Site and have confirmed the presence of hazardous substances (PAHs, Metals, PCBs, VOCs) at concentrations greater than health-based soil and/or groundwater standards. Remediation of these impacts is necessary to facilitate the non-industrial redevelopment of the Target Property. The following is a listing of the capstone reports associated with the Property.

- Ayers, 2018a. Phase I Environmental Site Assessment ASTM Practice E1527-13, Brillion Iron Works, 200 Park Avenue, Brillion, WI, June 2018.
- Ayers, 2018b. Site Investigation Report, Brillion Iron Works, 200 Park Avenue, Brillion, WI 54110, June 2018.
- Ayers, 2019a. Brillion Iron Works – Redevelopment, NR 716 Site Investigation Work Plan, BRRTS No. 02-08-581658, Brillion Iron Works, 200 Park Avenue, Brillion, WI 54110, November 2019.
- Ayers, 2019b. Limited Sampling, soil and groundwater data collected by Ayers dated November 2019 and May 2020 received by Stantec in May 2022.
- Legacy Architecture, Inc., 2019. Wisconsin Historical Society Nomination Questionnaire, Brillion Iron Works, July 24, 2019.
- Stantec, 2021, Review of Historic Property Deeds, Former Brillion Iron Works Property, 200 Park Avenue; Brillion, Wisconsin, November 2, 2021.
- Stantec, 2022a, Site Investigation Workplan, Brillion Works, LLC, Multi-Family Residential Development, Park Avenue & North Parkway Drive, August 24, 2022.
- Stantec, 2022b, NR 716 Site Investigation Report, Brillion Works, LLC, Multi-Family Residential Development, Park Avenue & North Parkway Drive, October 27, 2022.
- Stantec, 2022c, Remedial Action Plan, Materials Management Plan, and NR 718 Exemption Request, Multi-Family Residential Development, Park Avenue & North Parkway Drive, November 7, 2022.
- Stantec, 2022d, Addendum to the NR 716 Site Investigation Report, Multi-Family Residential Development, Park Avenue & North Parkway Drive, November 10, 2022.
- Stantec, 2022e, Historic Fill Exemption, Multi-Family Residential Development, Park Avenue & North Parkway Drive, November 14, 2022.
- Stantec, 2022f, Waste Characterization of Fill, Multi-Family Residential Development, Park Avenue & North Parkway Drive, November 28, 2022.
- Stantec, 2022g, Emerging Contaminant Scoping Statements, Multi-Family Residential Development, Park Avenue & North Parkway Drive, December 9, 2022.
- Stantec, 2023, Brillion Works Redevelopment Plan, February 17, 2022.

The target Property is ideal to combat housing insecurity in Brillion. The extraordinary subsurface contamination summarized above is prompting the current owner to apply for this cleanup grant.

Soil. Site investigation work confirmed the presence of a contiguous sitewide foundry sand fill with slag extending from the ground surface downward, up to 6.5 feet below grade (fbg). A spatial model estimates there are of 15,000 cubic yards (yd<sup>3</sup>) of foundry sand fill at the Property. Confirmed hazardous substances and/or petroleum constituents were

detected in soil/fill at concentrations greater than health-based ch.720 Wisconsin Administrative Code (WAC) residual contaminant levels (RCLs) for direct contact at non-industrial properties and/or migration of soil impacts to groundwater. Constituents of concern (COC) associated with the foundry sand fill include polycyclic aromatic hydrocarbons (PAHs) and resource conservation and recovery act (RCRA) metals. COCs associated with apparent releases/spills identified in the soil include volatile organic compounds (VOCs) and polychlorinated biphenyls (PCBs).

Groundwater. Groundwater sampling confirmed the presence of dissolved arsenic and selenium at the Property at concentrations greater than the ch.NR140 WAC Preventative Action Limit (PAL).

Vapor Intrusion. As suggested by Stantec (2022c), vapor intrusion concerns will be further addressed as part of the planned future use of the Property due to soil and/or groundwater with residual VOC impacts onsite which may extend beneath areas of proposed redevelopment. Depending on final reuse plans and building alignments, residual VOC impacts could pose a threat to indoor air quality due to vapor intrusion.

As discussed in the Stantec (2023) ABCA, Remedial action activities to be funded in this grant are warranted to facilitate redevelopment at the Property and include:

- Excavation and offsite disposal of impacted foundry sand/slag fill and impacted soil from the public greenspace area;
- Importing clean fill and constructing a vegetated soil engineered barrier public greenspace area;
- Establishing institutional controls/continuing obligations in the public greenspace area;
- Importing clean fill and constructing a soil engineered barrier in the multi-family residential area; and
- Design sub-slab vapor mitigation systems for the multi-family buildings.

(d) How the Site Became Contaminated and Nature/Extents of Contamination: The Target Brownfield Property is impacted from hazardous substances associated with the placement/burial/use of foundry sand and slag as fill in addition to discrete liquid spills of hazardous substances and petroleum associated with prior industrial operations. The proposed cleanup project will focus on addressing comingled residual impacts associated with heavy industrial uses of the property dating back to the late 19<sup>th</sup> Century described previously.

## 7. Brownfield Site Definition

Site is real property, the expansion, redevelopment, or reuse of which is being complicated by the presence or potential presence of hazardous constituents associated with previous Site operations. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and Appendix 1, the property targeted for this site-specific assessment is (a) **not** listed or proposed for listing on the National Priorities List; (b) **not** subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) **not** subject to the jurisdiction, custody, or control of the U.S. government.



## 8. Environmental Assessment Required for Cleanup Grant Applications

Following acquisition, the City continued environmental assessment activities as documented in the reports outlined in Section 6(e). The Phase II ESAs (Ayres, 2018b and 2019b) were all completed per ASTM E1903-19 with subsequent Site Investigations (Stantec, 2022) conducted under state cleanup program oversight.

## 9. Site Characterization

A letter from the Wisconsin Department of Natural Resources is provided in **Attachment B1**.

## 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.

## 11. Sites Requiring a Property-Specific Determination

The following provides details of the Target Property.

- (a) CERCLA Planned or Ongoing Removal Action: None currently under oversight by USEPA.
- (b-i) Unilateral Administrative Order: No orders are known.
- (b-ii) Court Order: No orders are known.
- (b-iii) Administrative Order on Consent: No orders are known to exist.
- (b-iv) Judicial Consent Decree: No orders are known.
- (b-v) Permit issued under RCRA, FWPCA, TSCA, and SWDA: No permits or corrective actions are known.
- (c) RCRA-Permitted facility on the Site subject to corrective action: No facilities are known.
- (d) Properties that are land disposal units that have submitted a RCRA closure notification: No closure notifications are known.
- (e) PCB Release Subject to Remediation Under TSCA: None currently under oversight by USEPA. PCB impacts to soil will remain under the jurisdiction of WDNR with coordinated approval by WDNR/USEPA per the WDNR/USEPA OCP MOA.

- (f) Assistance for Response Activity at the Site has Been Obtained for A Portion of the Site under Subtitle I of the SWDA from the LUST Trust Fund Established under Section 9508 if the IRS Code 1986: No portions are known.

## 12. (a) Threshold Criteria Related to CERCLA

iii. Landowner protections from CERCLA Liability. A Phase I ESA was completed by Ayres (2018b) per the All Appropriate Inquiries rule detailed in 40 CFR §312.21 utilizing ASTM E1527-13 on behalf of the City (current owner and grant applicant) in June 2018. The Target Property was acquired by the City on October 2, 2018 for the purpose of blight elimination and slum clearance. The City subsequently secured a liability exemption for local governmental units (LGUs) from WDNR per ch. 292.11(9) of the Wisconsin Administrative Code. Since taking ownership, the City has maintained compliance the required continuing obligations and no records have been identified indicating the City is considered potentially liable or known to be affiliated with any other person that is potentially liable for contamination at the Target Property (Stantec, 2021).

### (1) Bona Fide Prospective Purchaser Liability Protection

#### a. Information on Property Acquisition

- i. The Target Property was acquired by the City on October 2, 2018 from the previous owner (Brillion Iron Works Inc.) for the purpose of blight elimination and slum clearance.;
- ii. The City acquired the Property on October 2, 2018
- iii. The nature of ownership is fee simple.
- iv. The City acquired the property from Brillion Iron Works Inc.
- v. No records have been identified indicating the City is or was affiliated or related to prior owners or operators of the Target Property through familial, contractual, corporate, or financial relationships (Stantec, 2021).

#### b. Pre-Purchase Inquiry

- i. A Phase I ESA was completed by Ayres (2018b) per the All Appropriate Inquiries rule detailed in 40 CFR §312.21 utilizing ASTM E1527-13 on behalf of the City (current owner and grant applicant) in June 2018. The Target Property was acquired by the City on October 2, 2018 for the purpose of blight elimination and slum clearance. The City subsequently secured a liability exemption for local governmental units (LGUs) from WDNR per ch. 292.11(9) of the Wisconsin Administrative Code. The Stantec (2016b) Phase I ESA was completed by registered Professional Engineers, Professional Geologists, and environmental professionals (collectively ‘qualified environmental professionals’) as those terms are defined and required per § 312.10 of 40 CFR 312.
- ii. The Phase I ESA was completed in June 2018 and ownership transfer occurred on October 2, 2018. Therefore, the Ayres (2018b) Phase I ESA is considered valid for the purpose of establishing CERCLA liability defense.

- c. Timing and/or Contribution Toward Hazardous Substances Disposal. Disposal of all hazardous substances at the Target Property occurred before the property was acquired by the City. The current owner has not caused or contributed to any release of hazardous substances at the site. Further, the current owner has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- d. Post-Purchase Uses. The Target Property has remained vacant since ownership was transferred to the City. The subsurface investigation and remedial planning activities were completed by Stantec (2022b-2022g, 2023). The former condensery building and adjoining asphalt paved parking area were recently demolished to prepare the Target Property for non-industrial redevelopment.
- e. Continuing Obligations. The following provides a summary of activities conducted after October 2018 related to continuing obligations.
  - i. Stop continuing releases. As noted in the Stantec (2022b) no previously undocumented potential source areas (i.e. tanks/pits) were identified during the site-wide geophysical survey. Therefore, no sources of continuing subsurface release were thought to be present at the time of property transfer. Following completion of the site investigation, the former condensery building was razed. With the completion of the site investigation and demolition of the former condensery building, the City has taken all reasonable steps to stop a possible continued release.
  - ii. Prevent threatened future release. With the completion of the site investigation and demolition of the former condensery building, the City has taken all reasonable steps to prevent a threatened future release.
  - iii. Prevent or limit exposure to previously released hazardous substances. The Site is currently vegetated providing a barrier to impacted soil/fill. Signage provides for additional Site control. City police staff drive by the Site during regular patrols of the area to further control Site access and prevent illicit dumping. With the completion of the site investigation and demolition of the former condensery building, the City has taken all reasonable steps to prevent or limit exposure to previously released hazardous substances.

The City will continue to (i) comply with all land-use restrictions and institutional controls; (ii) assist and cooperate with those performing the assessment and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and (iv) provide all legally required notices.

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

- a. The Property is enrolled in the Wisconsin Department of Natural Resources (WDNR) Environmental Repair Program (ERP) and is being tracked in the Bureau for Remediation and Redevelopment Tracking System (BRRTS) under case number 02-08-590613 (**Attachment B2**). All subsurface environmental assessment work completed at the Site to date by Ayres and Stantec has been reviewed and approved by the WDNR project manager. WDNR will provide oversight of the cleanup proposed under this grant to ensure that the project protects human health and the environment.

The City will issue a RFQ to retain a QEP in compliance with 2 CFR Part 200 and 2 CFR Part 1500, if this grant is awarded. The QEP will assist the City in retaining the services of remedial contractors per the requirements of 2 CFR 200.317 through 200.327.

- b. As described in the Stantec (2023) ABCA, the proposed cleanup will not directly impact adjacent or neighboring properties.

#### 14. Community Notification

- a. Draft ABCA. Revision 0 of the Stantec (2023) ABCA was prepared on October 20, 2023 and made available for public comment on October 20, 2023.
- b. Community Notification Ad. The applicant published a community notification ad in the local newspaper on October 26, 2023.
- c. Public Meeting. A public meeting was held to discuss the draft application and consider public comments. The meeting was held on November 6, 2023.
- d. Community Notification Documents. Per the grant guidelines, the following is attached:
  - The draft Stantec (2023) ABCA (**Attachment B2**)
  - A copy of the newspaper ad (**Attachment B3**)
  - A summary of the comments received (**Attachment B4**)
  - The applicant’s response to those public comments (**Attachment B5**)
  - Meeting notes or summary from the public meeting (**Attachment B6**)
  - Meeting sign-in sheet/participant list (**Attachment B7**)

#### 15. Contractors

Not Applicable. The City will issue a RFQ to retain a QEP in compliance with 2 CFR Part 200 and 2 CFR Part 1500, if this grant is awarded. The QEP will assist the City in retaining the services of remedial contractors per the requirements of 2 CFR 200.317 through 200.327.



# Attachment B1 - Letter from WDNR

State of Wisconsin  
DEPARTMENT OF NATURAL RESOURCES  
101 S. Webster Street  
Box 7921  
Madison WI 53707-7921

Tony Evers, Governor  
Adam N. Payne, Secretary  
Telephone 608-266-2621  
Toll Free 1-888-936-7463  
TTY Access via relay - 711



November 8, 2023

Mike Smith, Mayor  
City of Brillion  
201 North Main Street  
Brillion, Wisconsin 54110  
*Via Email Mail Only to msmithbrillion@gmail.com*

**Subject: State Acknowledgement Letter for City of Brillion  
FY24 EPA Brownfield Cleanup Grant**

Dear Mayor Smith:

The Wisconsin Department of Natural Resources (DNR) acknowledges the application of the city of Brillion (the City) for the U.S. Environmental Protection Agency (EPA) brownfield grant identified above.

The DNR is fully committed to a collaborative partnership with the City, and is able to support your brownfield assessment and remediation efforts in many ways, including:

- The DNR can identify key state and federal contacts for your specific project and coordinate Green Team meetings with individuals in your community to answer questions and discuss local plans, options and best practices.
- The DNR can assist you in identifying and obtaining additional financial assistance from state-managed grant and loan programs.

Obtaining U.S. EPA funding for this grant application is consistent with community needs, is vital to the local economy and will help bring needed improvements to the quality of life for residents. Federal funding will also help initiate cleanup activities, create jobs and leverage local investments in brownfield redevelopment.

## **FY24 Cleanup Grant: Site(s) Eligibility, Characterization, and Readiness for Remediation**

For FY24, EPA requests that certain applicants for cleanup grants submit a letter from the state describing site eligibility and whether there is “a sufficient level of site characterization from the environmental site assessment performed to date (or will be by June 15, 2024).”

- **Eligibility.** This property is undergoing cleanup under Wisconsin’s cleanup program and its governing administrative code, Wis. Admin. Code chs. NR 700-799, and statute, Wis. Stat. ch. 292. The state cleanup program is regulatory and nonvoluntary. This property is eligible for the Voluntary Party Liability Exemption (VPLE) program under Wis. Stat. § 292.15; however, it is not enrolled in the VPLE program.
- **Site characterization status.** The applicant’s consultant submitted a site investigation and addendum, remedial action plan, material management plan and soil management exemption request, historic fill exemption, and emerging contaminants statement to the DNR. The DNR approved these submittals prior to the date of this letter. Site characterization is complete.

- **Timeframe.** For the property described in the attached request, dated October 27, 2023, the applicant stated that all required reports have been submitted and approved by the DNR, and that cleanup work may begin upon grant award.

Based on this representation, regulatory timeframes, and review timeframes, the DNR believes that site characterization has been completed.

Sincerely,

A handwritten signature in black ink that reads "Christine Sieger". The signature is written in a cursive, slightly slanted style.

Christine Sieger, Director  
Remediation and Redevelopment Program  
Wisconsin Department of Natural Resources

Attachment:  
Request dated October 27, 2023

cc:  
Kevin McNight, DNR NER – [kevin.mcknight@wisconsin.gov](mailto:kevin.mcknight@wisconsin.gov)  
Tauren Beggs, DNR NER – [tauren.beggs@wisconsin.gov](mailto:tauren.beggs@wisconsin.gov)  
Madeline Edwards, Stantec – [madeline.edwards@stantec.com](mailto:madeline.edwards@stantec.com)  
Patty Schreiber, City of Brillion – [clerk@brillionwi.gov](mailto:clerk@brillionwi.gov)