Brownfields Cleanup Grant Application
Narrative Information Sheet

R07-24-C-001

1. Applicant Identification:	City of Keokuk 501 Main Street Keokuk, Iowa 52632
2. Funding Requested:	
a. Grant Type:	Single Site Cleanup
b. Federal Funds Requested:	$4,485,900.00
3. Location:	
a. City:	City of Keokuk
b. County:	Lee County
c. State:	Iowa
4. Property Inforamtion:	Elkem-Carbide Site Auditor's Parcel 365 Carbide Lane Keokuk, Iowa 52632
5. Contacts:	
a. Project Director:	Cole O'Donnell 501 Main Stret Keokuk, Iowa 52632 319.524.2050 ext. 2205 codonnell@cityofkeokuk.org
b. Chief Executive/Highest Ranking Elected Official:	Kathie Mahoney, Mayor 501 Main Street Keokuk, Iowa 52632 319.524.2050 ext. 2212 mayor@cityofkeokuk.org
6. Population:	9,977

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7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United https://msc.fema.gov/portal/images/fema-logo-main.pngStates territory.	No
The proposed brownfield site(s) is impacted by mine-scarred land.	No
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secure resource is identified in the Narrative and substantiated in the attached documentation.	3
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 with a body of water but for a street, road, or other public thoroughfare separating them).	No
The proposed site(s)is in a federally designated floodplain.	No
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3/4
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3/4
The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures.	3/4
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.	No

8. Releasing Copies of Applications: No applicable (n/a) as the application does not have confidential, privilege or sensitive information.

State Environmental Authority (Iowa Department of Natural Resources) letter is Attachment 4 of attachments.

Brownfields Cleanup Grant Application
Narrative

1. Project Area Description and Plans for Revitalization

a. Target Area and Brownfields: i. Overview of Brownfield Challenges and Description of Target Area: Located in the rural southeast corner of Lee County in the State of Iowa, the City of Keokuk is a small city of 9,977[1] residents. Keokuk is positioned on a high bluff overlooking the confluence of the Mississippi and Des Moines Rivers. In 1871, a railroad bridge was built across the Mississippi River. At the time, Keokuk was home to twenty-one hotels and blossomed as a commercial and industrial center with a large iron and wood manufacturing presence. However, Keokuk's economy was negatively impacted by broader economic trends of the 1970s and 1980s, which led to the closures and significant downsizing of several local manufacturers, and subsequently had a devastating impact on the economy. From 1960 to 2020, the community experienced a 52% decrease in manufacturing jobs, a sector that once made up nearly 40% of the workforce[2]. This led to a large population decline of nearly 40% since 1960, when the city reached its peak population of 16,316[2]. In 2022, Keokuk received another devasting blow with the closure of ADM's 43-year-old mill warehouse and the closure of Blessing Health Keokuk hospital, leaving 216 without jobs. These economic downturns have drastically changed the city's commercial corridors, neighborhoods, and former industrial areas. The once booming downtown is now host to numerous vacant, abandoned, and dilapidated buildings. The economic downturn and declining population have created an overabundance of vacant housing (13%)[3], along with an abundance of abandoned, dilapidated (273,378 square feet of building space and 201.49 acres) and contaminated industrial sites (232 sites)[4]. One such site is the **Auditor's Parcel (Site)**, and this site is targeted for cleanup under this grant application. The target area (Lee County Census Tract 19111490800) and the Site were chosen because of the large low-income population (25.5%[5]), high environmental burden (76th percentile[6]) and status as a disadvantaged community[7].

ii. Description of the Proposed Brownfield Site: This project is focused on cleaning up 9.44 acres of the Site, which was part of the original Elkem Carbide facility, which is owned by the City of Keokuk. The Site is located in an industrial area of the northwest side of city and is bound to the north by Carbide First Additions (Plat 1), Carbide Lane; and beyond by the Amstead Rail; to the west by undeveloped grass and woodland and beyond by Highway 61; to the east by sections of the former Elkem Carbide facility and beyond by commercial properties; and to the south by an abandoned foundry, the former ADM facility and beyond by Johnson Street and residential acreages. The facility was initially planned without municipal oversight and was developed prior to being annexed by the city in the 1950's. The Site once enjoyed manufacturing prominence, robust community development, and significant earnings among workers, until operations ceased, and the Site was vacated in 2007. The Site was part of the original United Lead Co. that operated as a zinc smelter and lead alloying facility. By 1929 the Site was operating as Midwest Carbide Corp. manufacturing carbide in the 1950's the Site transitioned to carbon products which continued until 2007 when facility operations ceased. The Site quickly fell into disrepair and became home to vandals and squatters. In March of 2021, the City of Keokuk took ownership of the entire Elkem Carbide site, (including the Site) through Iowa Code 657A.10B Abandoned and Unsafe Buildings. This area has been identified as a redevelopment priority for the city to secure the site and eliminate the health and safety threat it poses. The Site boasts easy accessibility to U.S. Highway 61 and U.S. Highway 218 and rail lines with utility infrastructure making it ideal for light industrial development. The City of Keokuk received a FY2018 Site Specific Assessment Grant for the entire 79- acre Elkem Carbide site. Activities conducted under this assessment grant included a Phase I Environmental Site Assessment (ESA) for the entire Site as well as Phase II ESAs for portions of the Elkem Carbide site including Auditor's Parcel. Currently the city is working with EPA Region 7's TBA program to conduct Phase II ESAs on the western wooded area and the southern portion containing the old foundry. Recently,

[1] U.S. Census American Community Survey 2021 5-Year Estimate
[2] U.S. 2020 Census
[3] U.S. Census 2020 DEC Redistricting Data
[4] PEER: Platform for Exploring Environmental Records
[5] U.S. Census 2020 American Community Survey (ACS) 5-year estimates
[6] CDC ATSDR Environmental Justice Index Explorer
[7] Climate and Economic Justice Screening Tool

in FY23, the City of Keokuk was awarded a $2 million U.S. EPA Brownfield Cleanup Grant for Plat 1, the northmost portion of the former Elkem Site. An April 2022 Phase II ESA found that the Site is covered with varying thickness of dark gray to black, sand and gravel containing concentrations of polycyclic aromatic hydrocarbons (PAHs) and Resource Conservation and Recovery Act (RCRA) metals such as lead which exceeded the Iowa Department of Natural Resources (IDNR) Statewide Standards (SWO and EPA Regional Screening Levels (RSLs). These materials are typified by crushed coal, coal slag, carbonite, petroleum coke, and coal pitch tar in soil and fills. In August of 2016 Tetra Tech, Inc. through the Superfund Technical Assessment and Response Team (START) commissioned by U.S. EPA Region 7 Superfund Division preformed an Asbestos Containing Materials (ACM), Lead-Based Paint (LBP) Inspection, and a Household Hazardous Waste (HHW) inventory. This inspection found that the buildings on the Site have almost 11,000 square feet of ACM, nearly 11,200 square feet of lead-based paint and several hazardous materials. The City of Keokuk has secured the vacant site; however, visually reminiscent of post Chernobyl, the Site has been subject to vandalism, looting, and decay, increasing the risk of exposure to the various site contaminants. Additional health risks associated with contaminated soil and stormwater runoff continue to be a significant problem and a contributing factor to the area being among the least healthy in the State of Iowa. Lee County was reported in the top three counties with the greatest releases of lead to air[8]. Without remediation, the contaminated soil will continue to represent a threat to human health and the environment, and the Site left in its current state will exacerbate poor economic conditions (third highest city in poverty in the state[9]).

b. Revitalization of the Target Area: i. Reuse Strategy and Alignment with Revitalization Plans: Redevelopment of brownfield sites including the Site is of the utmost priority for the city and has been identified in both the Keokuk Comprehensive Plan and the Great River Region Transportation & Development Plan 2055 (CEDS).The Comprehensive plan identifies the following strategy: "Pursue brownfield remediation projects, to open up land for redevelopment, and enhance the community's aesthetics", and identifies the Elkem Carbide site and the Site as an ideal site to meet this strategy. Redevelopment plans have identified the Site as the ideal location for industrial development, because of its proximity to US Highways 61 and 218 and direct rail access. The CEDS identifies the following strategy: "Pursue brownfield redevelopment opportunities that can serve as an economic catalyst for the community," which can be met once the Site has been remediated. Current trends have businesses locating in areas that offer clean energy alternatives, natural outdoor settings, and shared by-product resources (known as business symbiosis). City leaders have created a redevelopment concept plan for the Elkem Carbide as part of the EPA's FY18 Brownfield Assessment grant for the Site that includes an ecologically friendly sustainable development with natural landscaped areas for inviting work environments. This plan was developed from input from the Elkem Carbide Brownfield Stakeholders Group and presented to the public via City Council Meetings and through the Keokuk Brownfields website (www.keokukbrownfields.com).

ii. Outcomes and Benefits of Reuse Strategy: Performing the environmental cleanup of the Site is an important next step in a multi-phased process to redevelop the overall Elkem Carbide facility. This cleanup considers substantive data collected during prior EPA brownfield grant-funded and Targeted Brownfield Assessment (TBA) activities at the Site. Iowa is a producer state, and with Iowa's freight shipments expected to grow by 30 percent by 2040, which means the freight infrastructure is needed. The Site is ideal for an intermodal logistical warehousing hub, with nearby access to rail, barge terminals, and four-lane highway system and will help meet the increasing demand. Once operational the Site is expected to create 10 to 15 new jobs with an hourly rate of $17.56 to $21.14 providing between $365,248 and $659,568[10] in wages annually. This intermodal logistical warehousing hub will help move freight in an environmentally responsible way. "On average, railroads are more fuel efficient, moving one ton of freight 444 miles on a single gallon of diesel fuel, generating a carbon footprint up to 75 percent less

[8] Scorecard, online 2011
[9] Stacker.com Cities in Iowa with the Most Living in Poverty
[10] Indeed Warehouse Wage Rates

than trucks according to the Association of American Railroads." Standford University's Emissions from Rails vs. Trucking paper concluded that rail is over seven times more energy efficient than trucking in terms of greenhouse gas emissions. Additional intermodal logistical warehousing hubs, like the one proposed at the Site, will provide the necessary freight infrastructure to allow more efficient and environmentally friendly shipping methods to flourish. In addition, warehousing facilities on the Site will be ideal candidates for the implementation of geo-thermal and/or solar.

c. Strategy for Leveraging Resources: i. Resources Needed for Site Characterization/ii. Resources Need for Site Remediation/iii. Resources Needed for Site Reuse: The City of Keokuk, with assistance from the Southeast Iowa Regional Planning Commission (SEIRPC), has been extraordinarily successful in recent years leveraging over **$20 million** in funding for infrastructure improvements, community development, housing and economic development projects benefiting the target area. The table below highlights the available funding sources the city and its partners are eligible for pertaining to assessment, remediation, and redevelopment of the Site and target area. The leveraged funds described will support the renovation/redevelopment of the Site; however, none of these improvements can be fully utilized if the Site remains dilapidated, full of hazardous materials, and generally unsafe for workers. Until the Site is cleaned up, redevelopment cannot be conducted, and many of the target area improvements will be of little consequence.

Resource	Type	Secured	Additional Details
Industrial/Construction Tax Exemption	Reuse	Unsecured	Abated local property tax for the value-added to industrial real-estate
Keokuk RLF	Reuse	Unsecured	Provides low interest loans up to $100,000.
Regional RLF	Reuse	Unsecured	Assists eligible businesses in retaining and creating jobs with low-interest loans up to $250,000.
New Market Tax Credit	Remediation & Reuse	Unsecured	Gap financing for transformative projects that bring new opportunities to low-income and distressed communities.
HUD CDBG	Remediation & Reuse	Secured	Funding to assist in the creation of affordable housing stock and community assets ($2,032,994 secured)
Historic Tax Credits	Reuse	Unsecured	Tax credits to assist in the rehabilitation and preservation of historic buildings within the target area.
Recreational Funding	Reuse	Secured	Funding for recreational projects in the target area ($1,182,371 secured)
Brownfield & Grayfield Tax Credits	Remediation & Reuse	Unsecured	Tax credits for developers to cleanup and redevelop brownfield/grayfield sites.
IDNR Brownfield	Assessment	Secured	$23,570 for assessment of target area brownfield sites.
EPA TBA	Assessment	Secured	Technical service work to conduct assessment on western and southern portions of the former Elkem Carbide site.
State RLF	Reuse	Secured	Low-interest loans to fund drinking water and wastewater projects. ($13,000,000 secured for target area).
Federal Programs	Reuse	Secured	EDA, USDA, SBA, K-State TAB provide support for various site and target area efforts ($3,304,463 secured)
State & Local Programs	Reuse	Secured	Programs to support various site and target area efforts ($2,088,180 secured).

iv. Use of Existing Infrastructure: As the Site is part of the Elkem Carbide facility, the Site has access to existing infrastructure (water, sewer, electricity, and transportation systems). Where possible, recycling and/or repurposing of the existing building structures and/or materials will be explored and encouraged to reduce landfill debris. Green/sustainable building, stormwater, and energy efficiency measures will be required through implemented

language in city land transfer and incentive agreements with prospective developers. Redevelopment in an intermodal logistical warehousing hub provides the opportunity for in-floor geothermal based heat systems as well as photovoltaic solar on the roofs. The developer will be encouraged to apply for energy efficiency tax credits. Currently, the city is working with Alliant Energy to potentially lease the landfill portion of the Site for 1+MW solar photovoltaic project under the Customer Hosted Renewable Pilot Tarriff opportunity.

2. Community Need and Community Engagement

a. Community Need: i. The Community's Need for Funding: Keokuk is limited in its ability to clean up the Site without EPA assistance. Years of declining population, declining tax base, and low wages have created economic hardship for the city. The city had to make some drastic changes for the FY24 city budget. The property tax had to be increased to cover the loss of sewer revenue from the ADM closure. In addition, the property tax rollback, passed by the Iowa legislature, has caused the taxable valuation to decrease in the city by $16 million, resulting in the general fund tax receipts, including the emergency levy, to be reduced by $55,108. To improve water quality and comply with EPA regulations, the city is undertaking a massive sewer separation project to separate all the combined sewer lines into individual stormwater and sanitary sewer lines. The project is estimated to cost $78 million over the 20-year phased construction implementation and should be completed by 2030. To help finance the enormous project cost, the city has had to significantly increase sewer fees, with additional increases planned over time (~5% per year until the separation project is completed). The City of Keokuk is the 34th highest city in Iowa for property tax rates out of 941 communities. With modest growth in property value, an already high property tax rate and being the third most impoverished city in Iowa[11], the city cannot justify additional taxes to raise revenue or to divert funds for brownfield cleanup from existing infrastructure projects.

ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: Lee County Census Tract 19111490800 (target area), has a disproportionate amount of sensitive populations. The area's sensitive population is comprised of children at nearly **25%**. Nearly a **third** of the sensitive population is made up of minorities and over **10%** are disabled[12]. The target area has an extreme poverty rate of **25.5%**, **over double** the state's rate of 11.1%[9]. Another indicator of the extreme poverty experienced in this target area is that almost 30% of all households receive food stamp assistance, which is nearly three times higher than both the city and state[9]. Children are disproportionately impacted by asbestos, hazardous materials, PAHs, petroleum, arsenic, and lead[13]. These environmental pressures create additional burdens as impoverished people are already at an elevated risk due to lack of affordable housing locations and access to healthcare. The closure of Blessing Health System Hospital created another social inequality for the community and sensitive populations. Cleanup and subsequent redevelopment of the Site will directly improve the wellbeing of the area, by creating a cleaner and safer area and by bringing higher paying jobs to the target area. The anticipated redevelopment of Site will help alleviate the extreme poverty, while removing blight and eliminating the contamination, vagrancy, and vandalism at the Site.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Unfortunately, the target area experiences abnormally high incidence of diseases that have been known to be related to exposures from environmental contaminants (asbestos, hazardous materials, PAHs, and lead) which are present on the Site. The area has a high pre-existing chronic disease prevalence sum for asthma, cancer, high blood pressure, diabetes, and poor mental health[14]. The contaminants identified at the Site have been found to cause cancer and could be contributing to Lee County's (smallest data group available) greater than the state rate for both new cancer and cancer deaths[15]. In addition, Lee County ranks 34th out of 99 (1 being the highest) Iowa counties for cancer rate

[11] Stacker.com – Cities in Iowa with the most living in poverty
[12] U.S. Census 2020 ACA 5-year estimates
[13] CDC.gov
[14] CDC ATSDR Environmental Justice Index Explorer
[15] University of Iowa's Cancer in Iowa 2022

and deaths. Lee County also has a cancer incidence rate of 516.1 per 100,000 cases and a death rate of 167.3.[16] Particulate matter (PM10 and PM2.5 specifically) emitted from local industry and asbestos throughout the target area's older building and housing stock is a known contributor to asthma. According to Iowa Department of Public Health (IDPH), Lee County (smallest data group available) found asthma related emergency department visits to have a crude rate (per 10K) of 35.26, nearly thirteen points over the state's crude rate. Children in Lee County were especially susceptible to asthma related emergency department visits with ages 0-4 having a crude rate of 47.75 versus the state's 39.67 and ages 5-14 having a crude rate of 49.90 versus the state's 27.41. In addition to asthma, lead exposure can cause brain and nervous system damage especially in children and premature birth and miscarriage in pregnant women. Nearly 6% of all children in Lee County (smallest data group) tested positive for lead. Lee County also experiences child and infant mortality rates higher than the state average[17]. According to IDPH, 20% of all infant deaths are caused by birth defects. Living near hazardous waste and/or contaminated sites, especially those with lead, have been identified as a possible risk factor for birth defects. The high disease rates identified above are strong indicators of the negative health impacts associated with the presence of asbestos, hazardous materials, PAHs, petroleum, arsenic, and lead contamination. Cleaning up the Site will remove a source of contamination exposure and effectively mitigating potential public health hazards.

Target Area EPA EJScreen	
Environmental Justice Indexes	State Percentile
Particulate Matter 2.5	94th
Ozone	88th
Diesel Particulate Matter	83rd
Air Toxics Respiratory HI	92nd
Traffic Proximity	82nd
Superfund Proximity	87th
RMP Facility Proximity	87th
Hazardous Waste Proximity	86th
Underground Storage Tanks	90th
Wastewater Discharge	95th

(3) Environmental Justice: (a) Identification of Environmental Justice Issues: Not surprisingly, neighborhoods around the Site are chosen by those who cannot afford to live in the "nicer" areas of the city. There is the perception that it is the individual's choice to live in these at-risk areas, but no one chooses to live in a structure close to heavy industry or environmentally contaminated sites. In reality, no families, children, or women of childbearing age would desire to live in this area, unless it offered cheaper housing. Brownfield sites, especially the Site have added to the environmental justice challenges continuing the cycle of disinvestment and poverty for this area. The area has an environmental justice rank of 0.96 which signifies that only 4% of the nation's census tracts likely experience more severe cumulative impacts from environmental justice issues[10]. This is evident through the EPA's EJScreen, where ten environmental justice indexes are over the 75th percentile compared to the state. Unfortunately, the area continues to suffer from economic setbacks.

(b) Advancing Environmental Justice: Environmental cleanup of the Site will function as a catalyst to attract more economic opportunity to the area, creating a prime location for light industrial development with access to existing highway and rail infrastructure. The redevelopment of the Site is anticipated to bring the opportunity for an intermodal logistical warehousing hub that will connect commercial and industrial logistic businesses to the adjacent rail lines. Redevelopment is anticipated to bring jobs to the target area with an hourly rate between $17.56 to $21.14.

b. Community Engagement: i. Project Involvement/ii. Project Roles:

Name of Organization	Point of Contact	Role
Iowa Department of Natural Resources (IDNR), the state agency responsible for	Mel Pins mel.pins@dnr.iowa.gov	The city first began working with IDNR back in 2014 on this

[16] Statecancerprofiles.cancer.gov
[17] County Health Rankings & Roadmap

conserving and enhancing Iowa's natural resources. The IDNR enforces the state and federal laws that protect air, land, water, and administers the Land Recycling Program (LRP) (state's voluntary cleanup program).	515.725.8344	Site. IDNR will continue to provide input on cleanup and additional grant funding, if necessary.
Lee County Health Department (LCHD) will continue its partnership with the City of Keokuk on this brownfields project. LCHD's mission is to protect health, prevent disease, and promote health and well-being for all persons.	Michele Ross lchd@leecountyhd.org 319.372.5225	Answer health related questions about contaminants of concern.
Lee County Economic Development Group (LCEDG) helps shape policies and programs explicitly directed at improving the business climate through specific efforts in business retention and expansion, workforce development, marketing, and new business attraction.	Dennis Fraise President & CEO dfraise@leecountyedg.com 319.463.9030 x1009	Through site selection and analysis services LCDEG will provide businesses expertise regarding land, office, manufacturing, and distribution opportunities, including the Site.
Southeast Iowa Regional Planning Commission (SEIRPC) works with governments, businesses, and citizens to strengthen southeast Iowa.	Zach James Assistant Director zjames@seirpc.com 319.753.4313	Provide grant management and lead community engagement efforts.
Keokuk Community School District (KCSD) provides an educational foundation where students are active participants in becoming adaptable and critical thinkers along with achieving the skills necessary for success.	Kathy Dinger kathy.dinger@keokukschools.org 319.524.1402	Assist in obtaining input from sensitive populations.
General Public – (with focus on the target area) Provide feedback regarding cleanup and redevelopment of the Site.		
Keokuk Area Chamber of Commerce (KACC) works with businesses for the better of the Keokuk area.	Trena Myers director@keokukchamber.com	KACC will continue to assist the city for Site redevelopment.
Keokuk Economic Development Corporation (KEDC) works to better the city's economic conditions.	Kerry Klepfer 319.524.4223	Assist with property redevelopment.

iii. Incorporating Community Input: The city recognizes the importance of community involvement activities as they build social strength and stability. This will be especially true for the area surrounding the Site, which is why the city will continue actively engaging residents. Most recently, on November 2, 2023, the city hosted a public meeting to share and solicit feedback on the draft EPA Cleanup Grant application and the draft ABCA. In addition, the city will actively engage in community participation and involvement in all phases of the redevelopment of the Site. The city intends to provide periodic progress updates to the City Council and the public. This will include information on the project schedule, providing draft and final versions of reports for public review/comment/input and discussing cleanup and redevelopment plans. Progress will be updated on the city's brownfields website at https://www.keokukbrownfields.com. The website will continue to have comments and input section to allow citizens to ask questions and provide feedback on cleanup and redevelopment initiatives. The website highlights how impactful and necessary EPA and DNR funding is in assisting with a redevelopment of this magnitude. As part of the EPA Assessment grant, the city established a "Brownfields Advisory Group" in 2018 that meets regularly to discuss assessments, site cleanup, and future redevelopment. The group consists of representatives

from the city, SEIRPC, EPA Region 7 staff, and LCEDG. This grant will allow the city will host at least two open house events (in person and/or virtual) at various venues throughout the area, such as churches, schools, or non-profits to keep interested citizens apprised about the progress and to solicit additional community input. Input will be recorded at each event and all substantive comments will be considered and presented to decision makers (City Council) so they can make informed decisions. Meeting information will be published in the local newspaper, city's website, brownfields website, and posted on social media and throughout public buildings (city hall and library). The combination of these community input actions will provide an opportunity to update and engage residents on the progress of the city's successful brownfields program.

3. Task Descriptions, Cost Estimates, and Measuring Progress

a. Proposed Cleanup Plan: The entire 9.44-acres Site was found to be covered in varying thicknesses of dark gray to black, sand and gravel containing crushed coal, coal slag, carbonite, petroleum coke, and coal pitch tar containing PAHs, RCRA metals. Lead was detected exceeding the SWS and RSLs. The Site buildings were found to contain 10,800 square feet of ACM, 11,189 square feet of LBP and other HHW that will be removed and disposed of according to state and federal regulations. Prior to the start of cleanup, the city will utilize a competitive procurement process to hire a cleanup contractor that will be tasked with the removal of ACM, HHW, and contaminated soil. The Site buildings will be demolished so that the soil contamination can be adequately cleaned up. Items within the buildings that can be salvaged will be recycled to minimize landfill debris. All contaminated surface soils will be graded, stockpiled, and mechanically sorted to segregate unused combustible coal and petroleum coke from combusted foundry sands, spent foundry sands, and contaminated fine-grained sediments. The recovered coal and petroleum coke may be removed off-site via tractor trailer or rail to its end user for energy production or industrial purposes. Spent foundry sands will be segregated from fine grained materials and may be encapsulated in Portland concrete cement (PCC) within the development area for use as roadway and building subbase. Flexural strength will be incorporated in the PCC design mix given it stimulates flexural stresses that are subjected to loading. Excess contaminated fine-grained sediments will be disposed of at the adjacent landfill on the larger Elkem Carbide site to the east pending regulatory permits and approvals. In the unlikely event that regulatory permits and approvals are not granted, the excess contaminated fine-grained sediments will be stockpiled, sampled for toxicity characteristic leaching procedure (TCLP) analysis, and disposed of at the Lee County, Iowa Landfill in Fort Madison, Iowa if deemed non-hazardous waste. If the materials are determined to be hazardous waste, the stockpiled materials will be transported and disposed of at a designated RCRA hazardous waste landfill.

b. Description of Tasks/Activities and Outputs: i. Project Implementation/ii. Anticipated Project Schedule/iii. Task Lead/iv. Outputs:

Task 1: Cooperative Agreement Oversight
i. Project Implementation: This will include but is not limited to grant oversight, grant management procurement and oversight, QEP procurement and oversight, Cleanup Contractor procurement and oversight, ensuring reporting requirements are met, budget and invoice reconciliation, ACRES reporting, and overall planning and coordination of cleanup activities.
ii. Anticipated Schedule: Quarters 1-12
iii. Task Lead: Cole O'Donnell (City Administrator) with assistance from SEIRPC and QEP
iv. Outputs: • Workplan; • Quarterly, Annual, and Final Reporting, Closeout Reporting; • Monthly Funding Draws Prepared/Reconciled and Submitted to EPA
Task 2: Community Engagement/Outreach
i. Project Implementation: Includes conducting community engagement activities with the purpose to inform the public on cleanup plans and implementation while providing opportunities for the public to provide feedback; outreach with target area; and developing/updating project website and printed materials.

ii. Anticipated Schedule: Quarters 1-12
iii. Task Lead: Cole O'Donnell, SEIPRC, and QEP
iv. Outputs: • Two Public Meetings; • Annual Updates to City Council; • Project Website; • Target Area Meetings; • Print Materials (Program Flyers)
Task 3: Cleanup Planning
i. Project Implementation: Cleanup planning will include finalizing the ABCA document, preparing the Quality Assurance Project Plan for confirmation sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup specification documents will be submitted to EPA and/or IDNR for approval prior to obtaining bids from qualified cleanup contractors. Following the acceptance of these documents, the city will initiate a competitive selection process and contract with a qualified cleanup contractor to implement cleanup.
ii. Anticipated Project Schedule: Quarters 2-4
iii. Task Lead: Cole O'Donnell, SEIPRC, and QEP
iv. Outputs: • Final ABCA; • Quality Assurance Project Plan; • NHPA/Section 106 Compliance; • Technical Specifications for Site Cleanup; • Remediation Contract
Task 4: Site Cleanup
i. Project Implementation: This task includes but is not limited to correspondence with the QEP and cleanup contractor, providing minimal site preparation, providing site security during cleanup, site cleanup and conducting cleanup monitoring.
ii. Anticipated Project Schedule: Quarters 5-8
iii. Task Lead: Cole O'Donnell, SEIPRC, and QEP
iv. Outputs: • Site Cleanup; • Cleanup monitoring of asbestos, hazardous waste, petroleum, and contaminated soil to ensure they are disposed of according to specifications; • Post Contamination Removal Action Report

c. Cost Estimates

Budge Category		Project Tasks				Total
		Task 1 Cooperative Agreement Oversight	**Task 2** Community Engagement	**Task 3** Cleanup Planning	**Task 4** Cleanup	
Direct Costs	Salary[1]	$0	$0	$0	$0	$0.00
	Fringe[1]	$0	$0	$0	$0	$0.00
	Travel[2]	$1,750	$0	$0	$1,750	$3,500.00
	Equipment[3]	$0	$0	$0	$0	$0.00
	Supplies[3]	$0	$0	$0	$0	$0.00
	Grant Administration[4]	$100,000	$55,900	$8,250	$8,250	$171,900
	QEP[5]	$25,000	$10,000	$105,000	$255,000	$395,000
	Cleanup Contractor[6]	$0	$0	$0	$3,915,000	$3,915,000
	Other[7]	$250	$0	$0	$250.00	$500.00
Total Direct Costs		$127,000	$65,900	$113,250	$4,180,000	$4,485,900
Total Indirect Costs[8]		$0	$0	$0	$0.00	$0.00
Total Budget		**$126,750**	**$65,900**	**$113,250**	**$4,180,000**	**$4,485,900**

Budget Justification: **(1)** City staff time will be donated to this project. **(2)** Travel costs are based on the average cost for two city staff to travel for five days from Keokuk to a major city for the National Brownfields Conference. (Airfare - $500 x 2 = $1,000; Hotel - $150 x 5 x 2 = $1,500; Meals $55 (federal per diem for major city) x 5 x 2 = $550; Airport Parking $10 x 5 = $50; Transportation to and from Airport = $150 **(3)** Included in grant administration **(4)** The city will contract with SEIRPC for grant administration. Staff time is $60 per hour with an estimated total hours of 2,800 hours ($168,000) and $3,900 for supplies for community engagement

activities (171,900 total). **(5)** The city will procure a QEP for cleanup planning, NEPA/Section 106, cleanup monitoring. Costs are based on an average of estimates provided by environmental consulting firms. Cleanup Planning - $55,000, NEPA/Section 106 - $50,000, Cleanup Monitoring - $255,000 (includes sampling) **(6)** The city will procure a cleanup contractor, costs are based on an average provided by cleanup contractors: Asbestos Abatement - $139,000, Hazardous Materials and Oil Waste Removal & Regulated Disposal - $36,000; Building Demolition - $1,340,000, Remove & Disposal of Contaminated Soil - $1,340,000, Landfill Cap - $540,00 **(7)** Registration for National Brownfields Conference $250 x 2 = $500 **(8)** The city does not plan to charge any indirect costs to the grant.

d. Plan to Measure and Evaluate Environmental Progress and Results: The city will develop a detailed project workplan for implementing planned outputs under the proposed grant. The workplan will detail key milestones within the grant period documenting and communicating outputs and outcomes to the public, EPA Region 7, IDNR, and other partners with all progress detailed in quarterly reports and on the city's brownfields website. At least monthly and prior to the completion of each quarter, the City Administrator will review and evaluate the project progress and take any necessary corrective actions should the schedule fall behind. Corrective actions may include holding weekly meetings/conference calls to all parties working on the grant as they occur. Lastly, the city will utilize the ACRES database to report, document, and track information such as job creation, dollars leveraged, property cleared for redevelopment, and exposure risks, reduced/eliminated. These statistics will also be communicated to IDNR, project partners, and the public.

4. Programmatic Capability and Past Performance

a. Programmatic Capability: i. Organizational Structure/ii. Description of Key Staff: The City of Keokuk has the requisite skills to satisfy all phases of work under this grant. The city has a team of dedicated and highly qualified staff that will oversee grant management. SEIRPC will serve as a liaison between the EPA Brownfields staff, the City of Keokuk, community partners, community members, and technical contractors. SEIRPC has substantial capabilities and the experience to manage all activities under this grant, having a long record of successfully managing community projects and federal grant programs. SEIRPC has a positive working relationships with federal and state funding agencies involved in any aspect of community development, including USDA, EPA, HUD, EDA, FHWA, FTA, NPS, Iowa Economic Development Authority (IEDA), IDNR, and Iowa Department of Transportation (IDOT). Over the past three years, SEIRPC has secured and administered over $19.12 million of state and federal grant funding for Southeast Iowa communities. Key to the management of this Brownfields grant will be the development of a Community Involvement Plan with established milestones and responsibilities. This will be developed at an initial meeting, which will include participation from SEIRPC Executive Director, SEIRPC Assistant Director, SEIRPC Regional Plans Administrator, SEIRPC Grants Manager, EPA staff, contractors (QEP and cleanup), and key staff from the City of Keokuk. The initial meeting will identify goals, strategies, and responsibilities to be included in the Community Involvement Plan. Performance measures will be established to track progress and ensure that the project is on schedule. In addition, staff will meet regularly with key partners to evaluate progress and keep the project moving forward from "discussion to development." The following individuals will form our Brownfields Program team for the project: **Cole O' Donnell,** Cole has been leading the Elkem Carbide Brownfield Redevelopment effort since 2018 when he was first appointed as the City Administrator. O'Donnell served as City Manager in Dixon, Illinois until August 2017. He previously worked as a city administrator in East Moline, Illinois, Algona, Iowa and Renville, Minnesota. He will continue to supervise administrative and environmental cleanup tasks as needed with assistance from local, regional, and state partners. **Zach James,** SEIRPC's Assistant Director will be assigned EPA management duties. His areas of expertise include transportation planning, community, and economic development, grant writing and administration, and project management. He has assisted the City of Burlington, Iowa with an EPA Region 7 Technical Assistance Grant, EPA Brownfields Assessment Grant, and an EPA Brownfield Area Wide Planning Grant. Additionally, he assisted the City of Keokuk with a Targeted Brownfield Grant for the Elkem Carbide site in 2014. Mr. James also

successfully led and completed an Impervious Surface Mapping Survey within Keokuk in 2017 to be used by the city to create a storm water utility. Under the Brownfields Cleanup Grant, he will lead all the community engagement activities associated with the grant and will be responsible for hiring and managing outside consultants; **Kansha Tiwari** joined SEIRPC in June of 2017 and serves as a Regional Planner. Prior to this position, Ms. Tiwari served as the Brownfields Project Coordinator for the City of Coralville, IA from 2015 – 2016. Ms. Tiwari will serve as a liaison between EPA Region 7, SEIRPC, and local partners. She will also be responsible for ensuring compliance with the administrative and reporting requirements of the cooperative agreement. Her duties will include the administration of grants and loans from IDPH, FHWA, IDOT, EPA, and more. She will assist in the performance of grant administration, specifically dealing with reimbursement requests and financial tracking. She will also provide support with community outreach and will be involved in other administrative tasks as needed.

iii. Acquiring Additional Resources: The city and SEIRPC will prepare a Request for Proposals/Qualifications (RFP/RFQ) to procure a qualified cleanup contractor and a Qualified Environmental Professional (QEP). The focus will be on securing the services of a firm experienced in performing work funded through this program and familiar with the program's requirements. All hiring will follow federal procurement requirements which will also satisfy the Iowa Code. The city will require the QEP and cleanup contractor to have adequate experience as well as hold appropriate state certifications to work on a project involving hazardous materials. The city and SEIRPC have experience with federal procurement and successfully followed all regulatory requirements with the previous EPA Site Specific Assessment Grant. The city promotes strong labor practices, by actively promoting opportunities to Iowa's Targeted Small Business (TSB) Program that is designed to help women, individuals with minority status, service-disabled veterans, and individuals with disabilities over come the hurdles to starting or growing small businesses in Iowa. Secondly, the city encourages selected contractors to hire local residents to meet project needs.

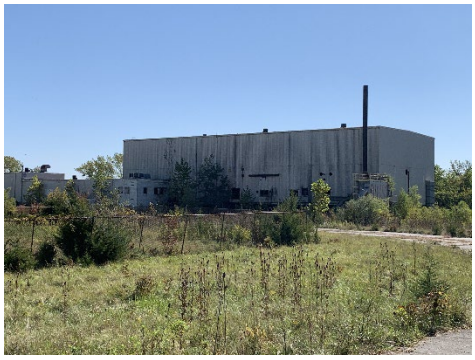
b. Past Performance and Accomplishments: i. Currently Has or Previously Received an EPA Brownfields Grant: The City of Keokuk was the recipient of a 2018 EPA Brownfields Site Specific Assessment grant for the Elkem Carbide site and a 2023 EPA Brownfields Cleanup Grant for Redevelopment Plat 1.
(1) Accomplishments/(2) Compliance with Grant Requirements:
EPA Brownfield Assessment Grant (2018 – 2022):

- A revised Phase I ESA completed on November 3, 2020, was conducted due to the expiration of the March 2, 2016, Phase I ESA and the city taking ownership in March of 2021.
- A Phase II ESA completed on April 18, 2022, confirmed petroleum coke and foundry slag stockpiles were still present on the Site.

Community engagement activities were an extremely valuable part of this project. As a result, a dedicated brownfields program website was created where citizens could view project progress and provide input. The City of Keokuk complied with all grant requirements including ACRES reporting, and quarterly, annual, and closeout reports for the grant. The COVID-19 pandemic caused a delay in the project, and as a result, a one-year grant extension was obtained. The project was able to meet all adjusted milestones and closeout within the adjusted grant period. EPA staff visited the Site on March 23rd, 2022. The Brownfields Advisory Committee, the Mayor and City Council members were present during the visit. Local partners gave an overview of Keokuk and socio-economic demographics along with the history of the Elkem Carbide site and contaminants found. An overview of the history of the Site as well as contaminants found on the Site was presented.
EPA Brownfields Cleanup Grant (2023-2027): The City of Keokuk has procured and selected a QEP for the project. The QEP has begun the QAPP and final ABCA, which are on schedule to be finalized by the end of quarter one or the first part of quarter two. The first round of public input is on track to be held in quarter two. The project is on track to meet the goals and milestones of the project workplan.

Brownfields Cleanup Grant Application
Threshold Criteria

1. **Applicant Eligibility:**



The City of Keokuk is an incorporated municipality in the State of Iowa and is eligible for funding. (See Attachment 1)

2. **Previously Awarded Cleanup Grants:**

No previously awarded EPA Brownfields Cleanup Grant funding has been utilized for Auditors Parcel of the Former Elkem Carbide Site.

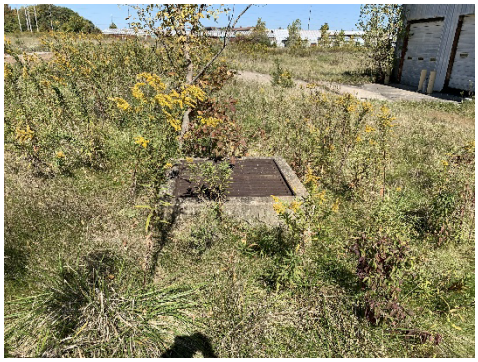
3. **Expenditure of Existing Multipurpose Grant Funds:**

The City of Keokuk, Iowa affirms it does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership:**

The City of Keokuk acquired the property, through 657a of the Iowa Code, on March 31, 2021. The city will retain ownership throughout the period of the grant. (See Attachment 2)

5. **Basic Site Information (See Attachment 3):**



a) *Site Name:* Auditors Parcel
b) *Address:* 365 Carbide Lane
Keokuk, IA 52632

6. **Status of and History of Contamination at the Site:**

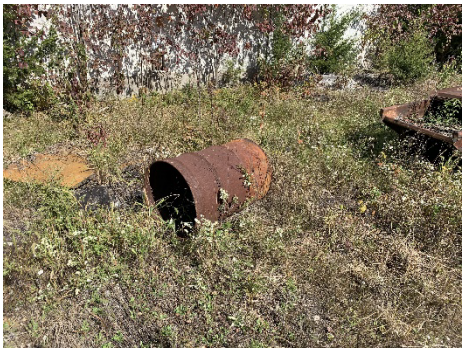
a) *Hazardous Substances or Petroleum:* The site is contaminated by the following hazardous substances:
   i. Polycyclic Aromatic Hydrocarbons (PAHs)
   ii. Resource Conservation and Recovery Act (RCRA) Metals
   iii. Asbestos Containing Materials (ACM)
   iv. Lead-Based Paint (LBP)
   v. Hazard Materials (fire extinguishers, waste drums, fluorescent lamps, thermostats, PCB ballasts, water heaters and fountains, latex solvents, and electronic equipment).

b) *Operational History and Current Uses:* The Site was historically used for industrial operations as part of the original United Lead Co. that operated as a zinc smelter and lead alloying facility, however by 1929 the site was operating as Midwest Carbide Corp. manufacturing carbide. Then in the 1950's the site transitioned to carbon products until 2007 when facility operations ceased. The site has been vacant since 2007.

c) *Environmental Concerns:* A July 15, 2022, Phase II ESA found that Auditor's Parcel was covered with varying thicknesses of dark gray to black, sand and gravel containing crushed coal, coal slag,

carbonite, petroleum coke, and coal pitch tar. These substances contain concentrations of polycyclic aromatic hydrocarbons (PAHs) and Resource Conservation and Recovery Act (RCRA) metals lead and arsenic exceeding the Iowa Statewide Standard (SWS) and EPA Regional Screening Levels (RSLs). In August of 2016 Tetra Tech, Inc. through the Superfund Technical Assessment and Response Team (START) commissioned by U.S. EPA Region 7 Superfund Division preformed an Asbestos Containing Materials (ACM) and Lead-Based Paint (LBP) and a Household Hazardous Waste (HHW) inventory. In addition to LBP, this inspection found the buildings on Auditor's Parcel have ACM and several hazardous materials including fire extinguishers, oil drums, fluorescent lamps, thermostats, PCB ballasts, water heaters and fountains, latex solvents, and electronic equipment. The City of Keokuk has secured the vacant site.

d) *Source, Nature, and Extent of Contamination:* The Property was developed circa 1915 for the purpose of smelting and refining zinc and lead. Other products produced at the Property included electrode paste, tin cans, casting metals, bearings, and various carbide products. The site became contaminated as a result of the dispersion of waste products associated with the industrial activities through the surface of the site. Foundry sand, coal tar, lead and zinc smelting by-products, coal and petroleum coke stockpiles containing high concentrations of PAHs and heavy metals were also used as building subbase and are dispersed throughout the site. The carbide plant ceased operations in the late 1980s and remaining activities at the Property ceased in 2007.



7. Brownfields Site Definition:

The site is (a) not listed or proposed for listing on the National Priorities List; the site is (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 the site is (c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications:

EPA Regional Assessment Grant (2010):

- A Phase I Environmental Site Assessment – dated July 2, 2009
- A Phase II Environmental Site Assessment – dated April 28, 2010

EPA Technical Brownfields Assessment Grant (2016):

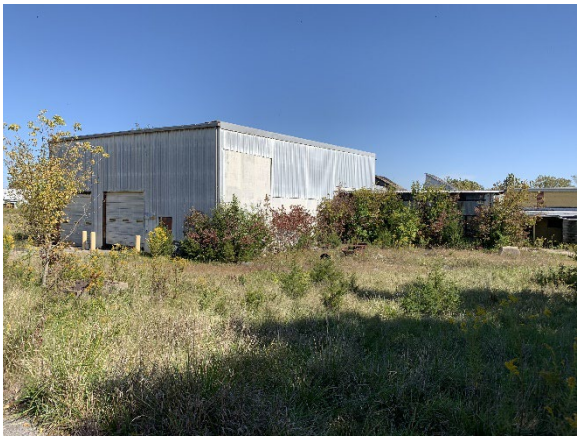
- A Phase I Environmental Site Assessment – dated March 2, 2016
- A Phase II Targeted Brownfields Assessment, August 18, 2016
    - Included Household Hazardous Waste Inventory and Lead-Based Paint Inspection
- A Phase II Environmental Site Assessment – dated September 22, 2016
    - Included an ACM Inspection

Brownfields Cleanup Grant Application
Threshold Criteria

EPA Brownfield Site Specific Assessment Grant (2018 – 2022):

- A revised Phase I Environmental Site Assessment, November 3, 2020 – The property reconnaissance, and interviews indicates that presently there are twenty-six (26) Recognized Environmental Conditions (RECs), one (1) Historical Recognized Environmental Condition (HREC), multiple de minis conditions, one (1) Vapor Encroachment Condition (VEC), and two (2) Non-Scope ASTM Considerations associated with the property. The scope, type, and/or extent of these RECs represent an environmental impact and/or potential risk to the property, which warranted additional investigation to detect the potential presence of hazardous substances or petroleum products.

- Phase II Environmental Site Assessment, July 15, 2022, for Auditor's Parcel- Identified:
    - Concentrations of PAHs as benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, and indeno(1,2,3-cd)pyrene were identified in surficial fill sediments exceeding the Iowa Department of Natural Resources (IDNR) Statewide Standards (SWS) and EPA IRSLs.
    - Concentrations of RCRA metals as arsenic, lead, and cadmium were identified in surficial fill sediments exceeding the IDNR SWS and EPA Industrial DC RCL.
    - PAH and TEH concentrations were detected in groundwater exceeding the IDNR SWS for protected and non-protected groundwater sources receptors at three sample locations; however, the City of Keokuk has a well ordinance (Ordinance No. 1865) which prohibits private water supply wells within 300-feet of a public water line; therefore, the groundwater ingestion pathways are not at risk.
    - Multiple volatile organic compounds (VOCs) were detected in soil gas at concentrations below their respective target sub-slab Vapor Intrusion Screening Levels (VISLs) for commercial use properties.
    - Multiple VOCs were detected at concentrations below their respective target indoor air VISLs risk criteria.

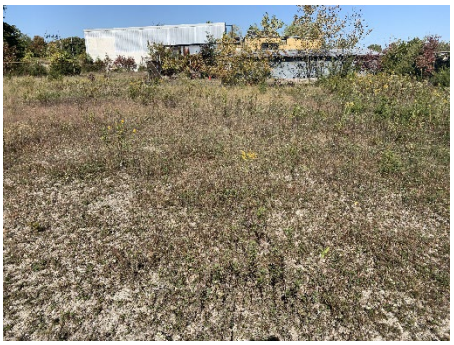


9. <u>Site Characterization:</u>

a) Not applicable

b) i. The City of Keokuk has been in close coordination with the Iowa Department of Natural Resources regarding site cleanup. The city has obtained a letter dated October 27, 2023 (Attachment 4) that the site is eligible to be enrolled in the state's Land Recycling Program (LRP) (the state's voluntary response program). The city intends to enroll the site in the LRP and is working through the application process.
ii. The Site will be enrolled into the Iowa Department of Natural Resources Land Recycling Program (Iowa's Voluntary Response Program).

iii. A sufficient level of assessment has been completed to characterize the site for the contaminants of concern, including asbestos, lead, RCRA metals and polyaromatic hydrocarbons, and the city and its brownfield planning partners have had multiple discussions and meetings with DNR to facilitate their anticipated enrollment in the DNR's voluntary cleanup program, known as the Land Recycling Program (LRP) in Iowa Law. The DNR affirms that the site will be ready for remediation efforts, with all necessary assessments having been completed before June 15, 2024

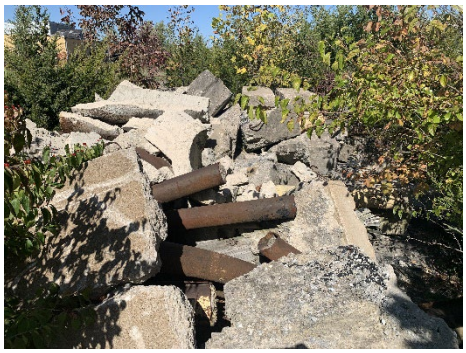


c) Not applicable

10. <u>Enforcement or Other Actions:</u>

The city is unaware of any ongoing or anticipated environmental enforcement or other actions related to this site. The city has been in close coordination with the Iowa Department of Natural Resources (IDNR), the agency that would lead and be aware of such enforcement actions.

11. <u>Sites Requiring a Property-Specific Determination:</u>

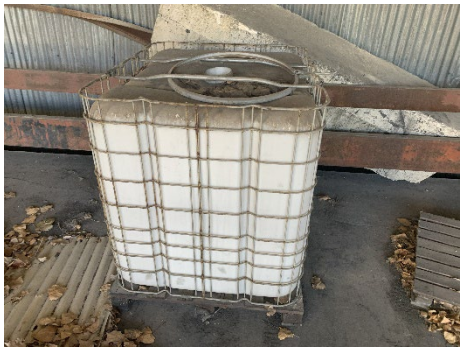


Not applicable

12. <u>Threshold Criteria Related to CERCLA/Petroleum Liability:</u>

a) <u>Property Ownership Eligiblity – Hazardous Substance Sites:</u>

i. (1) Not applicable
(2) Not applicable
(3) Property Acquired Under Certain Circumstances by Units of State and Local Government:
(a) The City of Keokuk Iowa acquired ownership of the site through Iowa Code 675A Abandoned or Unsafe Buildings. This allows for a city in which a building that has been abandoned for at least six consecutive months to petition the court to enter judgement awarding title to the abandoned property to the city. The city was awarded title on March 31, 2021. The site had been abandoned since 2007.
(b) The city acquired the property on March 31, 2021.

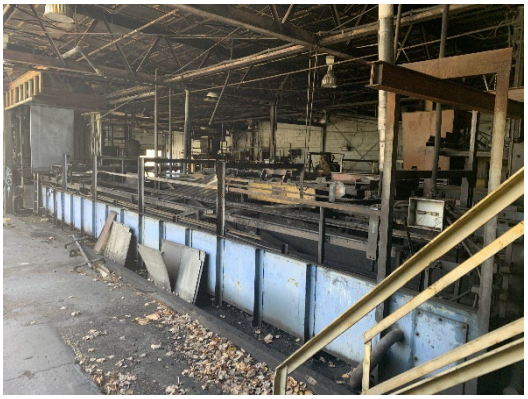


(c) The City of Keokuk affirms that the disposal of hazardous substances at the site occurred before the city acquired the property.
(d) The City of Keokuk affirms that it has not caused or contributed to any release of hazardous substances at the site.
(e) The City of Keokuk affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

ii. Not appliable
iii. Not applicable

13. Cleanup Authority and Oversight Structure:

a) *Oversight:* The city does plan on enrolling the site into the IDNR's LRP (the state's response program). The city will hire, through a competitive bid procurement process, a qualified environmental professional (QEP) to oversee the cleanup process. Through a competitive bid procurement process the city will hire a qualified cleanup contractor to remove and dispose of contaminated soils, ACM materials and hazardous materials. The contractors will be responsible for performance of cleanup activities, complying with all applicable local, State and Federal laws, and will provide full documentation and reporting on all removal activities. The City of Keokuk will comply with competitive procurement provisions of 2 CFR 200.317 through 300.326 and ensure that this technical expertise is in place prior to beginning cleanup activities.



b) *Access:* The city has ample access to all areas of the site necessary for cleanup and does not anticipate impacting adjacent properties.

14. Community Notification:

a) *Draft Analysis of Brownfield Cleanup Alternatives:* The city prepared a Draft Analysis of Brownfields Cleanup Alternatives which met the stated criteria and provided it to the public for comment. The Draft ABCA was completed on October 20, 2023, and updated on October 31, 2023.

b) *Community Notification Ad:* The city published a community notification ad in the local newspaper (*The Daily Nonpareil*) on October 26, 2023 (Attachment 5a). The community notification identified: (1) that a copy of this grant application, including the draft ABCA, was available is located; and (2) how to comment on the draft application; (3) where the draft application is located; and (4) the date and time of a public meeting to discuss and accept comment on the draft application.

c) *Public Meeting:* The city held a public meeting as advertised, on November 2, 2023.

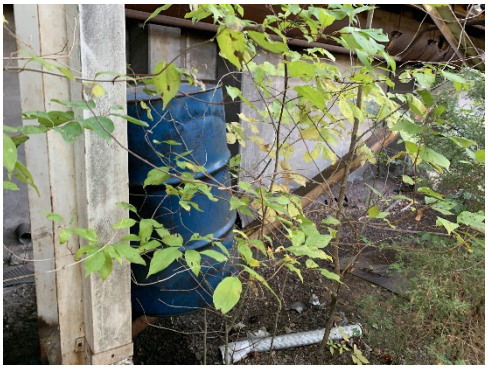
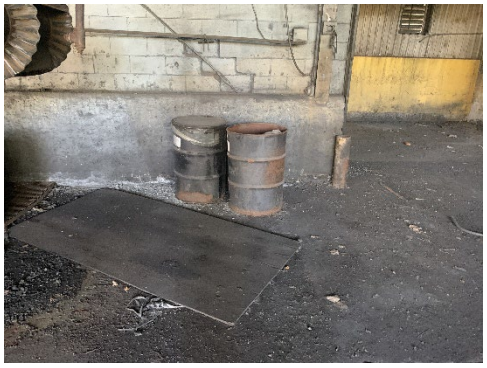
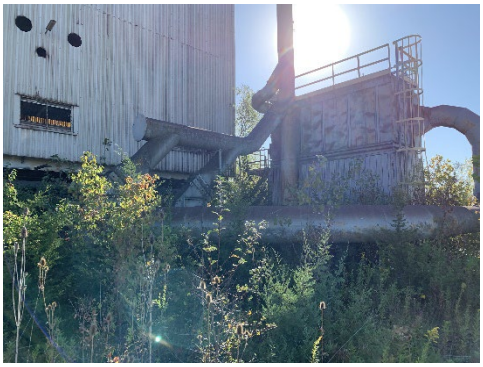
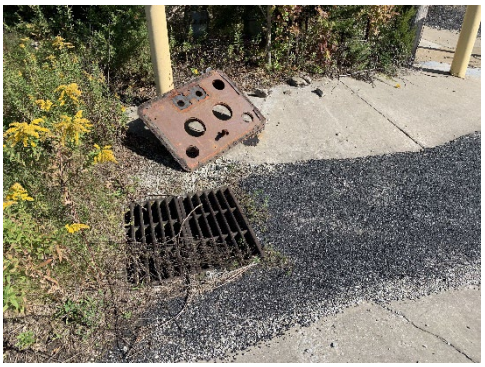
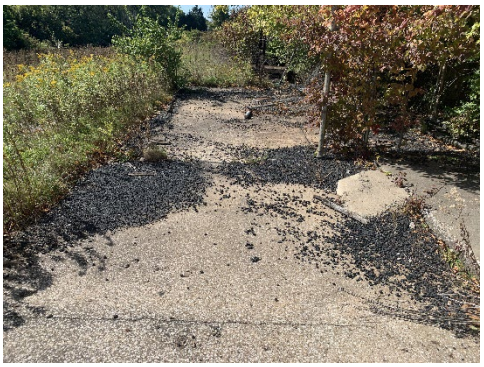
d) *Submission of Community Notification Documents:*

- Attachment 8: Draft ABCA
- Attachment 5a: Community Notification Ad
- Attachment 5b: Public Comments

- Attachment 5c: Response to Comments
- Attachment 5d: Public Meeting Notes/Summary
- Attachment 5e: Meeting Sign-in Sheet and Printed Materials

15. Contractors and Named Subrecipients

The city will utilize the services of Southeast Iowa Regional Planning Commission (SEIRPC) for grant management services. SEIRPC is a council of government that was established under Iowa Code 28H.1 to serve Des Moines, Henry, Lee, and Louisa counties. As such the city does not have to procure to utilize SEIRPC services as they are a governmental entity. The city will acquire additional technical expertise and resources through the service of a qualified EPA brownfield experienced QEP, subject to a competitive selection process. The QEP will assist with project management, cleanup planning, and site cleanup monitoring. The city has implemented this resource acquisition process successfully on previous brownfield grants resulting in the achievement of all cooperative agreement objectives. The city has a significant history working closely with the executive officer of the Iowa Brownfield Program to provide technical expertise and advice. All contracts for this program will be completed and consistent with applicable and competitive Procurement Standards in 40 CFR Parts 30 or 31 and will include guidance to attract and utilize minority- and women-owned businesses, as possible. Resumes are included in Attachment 7.

October 27, 2023

Susan Klein
Regional Brownfield Program
EPA Region VII
1201 Renner Road
Lenexa, KS 66219

RE: FY24 Brownfield Cleanup Grant Application
former Elkem Carbide (Auditor's Plat), City of Keokuk, Iowa

Dear Susan:

This letter is submitted as a statement of acknowledgement, review and support from the Iowa Department of Natural Resources (DNR) for the brownfield cleanup grant being submitted by the City of Keokuk, to conduct environmental cleanup of contaminants on 9.44 acres of land associated with operations of the former Elkem Carbide manufacturing facility in Keokuk, Iowa.

This facility produced carbon products for over 90 years, and included operations for zinc smelting and lead alloy production. Elkem closed the facility in 2007, and the site had sat vacant for more than a decade. The DNR has worked closely with the City of Keokuk, the Southeast Iowa Regional Planning Commission, and EPA Region VII brownfield and RCRA programs and staff, on approaches and processes for the City to acquire the site to facilitate necessary environmental assessment, risk-analysis, cleanup strategies, and ultimately, redevelopment of the site for benefit to the community.

The city acquired the site in compliance with CERCLA provisions for eligibility to be considered for future cleanup grants, and the site has had extensive site characterization work through previous brownfield assessments grants awarded to the community, as well as assistance from EPA Region VII's Targeted Brownfield Assessment (TBA) Program. These assessments were coordinated with the DNR for our input, review, and direction to ultimately facilitate cleanup.

A sufficient level of assessment has been completed to characterize the site for the contaminants of concern, including asbestos, lead, and polyaromatic hydrocarbons, and the City and its brownfield planning partners have had multiple discussions and meetings with DNR to facilitate their anticipated enrollment in the DNR's voluntary cleanup program, known as the Land Recycling Program (LRP) in Iowa Law. The DNR affirms that the site will be ready for remediation efforts, with all necessary assessment having been completed before June 15, 2024.

The DNR has appreciated the opportunity to be a supportive partner for brownfield assessment, risk-review, and cleanup planning for the Elkem Carbide site, and we support the cleanup plan presented within the city's application with the highest degree of endorsement and confidence.

Sincerely,

Mr. Mel Pins
Executive Officer
Iowa Brownfield Redevelopment Program

cc: Cole O'Donnell, Administrator, City of Keokuk, Iowa