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October 10, 2007

Environmental Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Dear Mr. West:

Southeast Iowa is an economically depressed region in Iowa, with a rich history in industry and transportation. Situated along four lane highways, the Mississippi River and two major rail lines, the region is ripe for redevelopment, but has been struggling to recover after major job losses, mostly in the manufacturing sector.

The proposed project is a community wide (on a regional scale) hazardous substance assessment program, targeting properties suspected of hazardous contamination in southeast Iowa. This project will follow the success of the Southeastern Iowa Brownfields Initiative, a region-wide hazardous and petroleum substance assessment grant proposal funded by EPA in 2004.

The past assessment initiative has been a success, and the success has increased public demand for additional EPA assistance in assessing properties. SEIRPC has spent 100% of its assessment funding and has met all EPA requirements; furthermore its six site assessments, Phase I and II, are completed. SEIRPC has shown its capability in managing the EPA funding and its effectiveness in completing its stated work plan.

Recently, the Phase I and II assessments at the former Ferro-Sil site in Keokuk, IA, has facilitated the purchase and beginning redevelopment of the 80-acre site along the Mississippi River. SEIRPC strongly believes that with another EPA Assessment grant, successes like this can be replicated in the future.

SEIRPC seeks \$200,000 in community-wide hazardous substance assessment funding to continue in the economic redevelopment of the southeast Iowa region.

Sincerely,

D. Brian Tapp
Executive Director

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U.S. EPA BROWNFIELDS ASSESSMENT GRANT APPLICATION



SOUTHEASTERN IOWA BROWNFIELDS REDEVELOPMENT INITIATIVE

PREPARED BY:

SOUTHEAST IOWA REGIONAL PLANNING COMMISSION



OCTOBER 2007

REQUIRED INFORMATION

1. APPLICANT IDENTIFICATION:

Southeast Iowa Regional Planning Commission
200 Front St, Suite 400
Burlington, IA 52601
Ph: 319.753.5107
Fax: 319.754.4763
Web: www.seirpc.com

2. FUNDING REQUESTED

- a. Grant Type: Assessment
- b. Amount: \$200,000
- c. Contamination: Hazardous
- d. Community Wide (southeast Iowa region)

3. LOCATION

The location of the proposed project is the southeast Iowa region, consisting of the four southeastern-most counties in Iowa: Des Moines, Henry, Lee and Louisa. The region contains 33 municipalities and approximately 110,000 people. Although eligible sites from the entire region will be considered, the assessment program will be focused on the cities of Mount Pleasant, Keokuk, Fort Madison and Burlington.

4. CONTACTS

Organization executive:

D.Brian Tapp, Executive Director
Southeast Iowa Regional Planning Commission
200 Front St, Suite 400
Burlington, IA 52601
Ph: 319.753.5107 x204
Fax: 319.754.4763
Email: btapp@seirpc.com

Project manager:

Mike Norris, Assistant Director
Southeast Iowa Regional Planning Commission
200 Front St, Suite 400
Burlington, IA 52601
Ph: 319.753.5107 x210
Fax: 319.754.4763
Email: mnorris@seirpc.com

5. DATE SUBMITTED

October 12, 2007

6. PROJECT PERIOD

Three years from the date of grant award

7. POPULATION

- a. General population of jurisdiction: 110,000
- b. SEIRPC serves a four county area with a total population of 110,000, which is the subject of this proposal.

8. OTHER

The southeast Iowa region has several Enterprise Zones, including in Keokuk, Fort Madison and Burlington. Southeast Iowa is also an Economic Development District, under the Economic Development Administration.

9. COOPERATIVE PARTNERS

- Lee County Economic Development Group: Mr. Tim Gobble, Vice President
319.463.5599
- Grow Greater Burlington (Burlington/West Burlington Chamber of Commerce), Mr. Dennis Hinkle, President and CEO, 319.752.6365
- Fort Madison Chamber of Commerce, Mr. Tracy Vance, Executive Director,
319.372.5471
- Keokuk Economic Development Corporation, Mr. Allen Zastrow, President,
319.463.5599
- Fort Madison Economic Development Corporation, Mr. Robert Winkler, President,
319.463.5599
- Keokuk Chamber of Commerce, Ms. Katie O'Brien, Director, 319.524.5055
- Alliant Energy, Mr. Gary Williams, Economic Development Manager, 319.786.4277
- Mid American Energy, Mr. John Wetzel, 563.333.8810

THRESHOLD CRITERIA

A. APPLICANT ELIGIBILITY

SEIRPC is an eligible entity to receive this grant, as it is an intergovernmental association formed under Chapter 28H of the Iowa Code and is a not for profit 501 (6) c entity. Please see Exhibit A. at the end of the application for Chapter 28H.1 of the Iowa Code which details the formation of the Southeast Iowa Regional Planning Commission, a government entity created by the Iowa State Legislature, and thus an eligible entity for EPA Assessment funding.

B. LETTER FROM STATE OR TRIBAL ENVIRONMENTAL AUTHORITY

Please see Exhibit A

C. SITE ELIGIBILITY AND PROPERTY OWNERSHIP ELIGIBILITY

SEIRPC is applying for a community-wide hazardous substance assessment grant and therefore criteria C. does not apply to this application.

RANKING CRITERIA

A. ASSESSMENT GRANT PROPOSAL BUDGET

The budget summarized below reflects how funds would be committed to implement the EPA Brownfields Assessment Grant for those sites believed to be adversely impacted by hazardous substances. SEIRPC will work with representatives from the cities of Burlington, Fort Madison, Keokuk, Mount Pleasant and Mediapolis to distribute funds equitably and consistent with regional goals to facilitate the revitalization of targeted brownfield properties in southeast Iowa.

Budget Categories (Programmatic)	Project Tasks					Total
	Task 1	Task 2	Task 3	Task 4	Task 5	
Personnel	\$ 10,000	\$ 2,000	\$ 2,000	\$ 2,000	\$ 1,000	\$ 17,000
Travel	\$ 5,000					\$ 5,000
Equipment						\$ -
Supplies	\$ 2,500	\$ 2,000	\$ 400	\$ 400	\$ 200	\$ 5,500
Contractual		\$ 5,000	\$ 20,000	\$ 135,000	\$ 12,500	\$172,500
Other						\$ -
Total	\$ 17,500	\$ 9,000	\$ 22,400	\$ 137,400	\$ 13,700	\$200,000

BUDGET KEY:

Task 1: Program Implementation – This task includes expenses incurred for activities integral to achieving the purpose of the grant including reports, conferences, meetings and coordination.

Task 2: Community Outreach – This task includes coordination and implementation of a "Public Outreach Day" concurrent with a Phase II field assessment. It also includes website development for community communication purposes.

Task 3: Phase I Assessments – This task consists of conducting ASTM E 1527-05 site assessments on targeted properties, including obtaining site access agreements and report submittal. It is estimated that three properties will undergo Phase I assessments at an estimated cost of \$5,000each, including programmatic costs, contractual costs, and supplies.

Task 4: Phase II Assessments – Based on the Phase I Assessment results, conduct Phase II Assessments on the targeted properties including obtaining additional site access agreements if necessary, collecting soil and groundwater samples, laboratory analysis and a summary report. It is estimated that three new properties will undergo Phase II assessments, and two properties previously assessed will go through expanded assessment including programmatic costs, contractual costs and supplies.

Task 5: Work Plans – Development and approval of program quality assurance documents and cleanup planning.

B. COMMUNITY NEED

1. Southeast Iowa remains one of the most economically distressed areas in Iowa due to its high unemployment rate, job loss and demographic trends. The counties of Des Moines, Henry and Lee reflect the pronounced adverse impacts of brownfields sites and economic decline. For these reasons, SEIRPC is focusing on the following cities: Burlington (Des Moines Co); Fort Madison and Keokuk (Lee Co); and Mount Pleasant (Henry Co). The summary below highlights region- and city-wide characteristics associated with the targeted communities that the project will benefit.

- Targeted communities have lost a total of 7.5% of their population from 1990 to 2000 (2000 US Census).
- Southeast Iowa has lost 14% of its manufacturing payroll value from 1998 to 2004, putting the region in economic distress (Iowa Workforce Development).
- The targeted cities have a combined 5.5% unemployment rate, 49% higher than the state rate of 3.7% (Iowa Workforce Development).
- Des Moines, Henry and Lee counties combined have an average poverty rate of 9.6%, 6% above the state average of 9.1% (2000 US Census).
- Des Moines, Henry and Lee counties combined have a 15% higher percentage of disabled individuals compared to the statewide average (2000 US Census)
- Des Moines, Henry and Lee counties have lost 11% of their labor force between 1993 and 2004 while the US and Iowa have had gains of 15% and 5%, respectively (Iowa Workforce Development).
- Des Moines, Henry and Lee counties have 60% of their residents aged 20-29 years leave the region (2000 US Census).
- The Southeast Iowa region receives the most Trade Adjustment Assistance in Iowa, which gives job training to employees whose manufacturing jobs have left the country (Iowa Workforce Development).

2. Securing EPA assessment funds will enable SEIRPC and participating communities to mitigate the adverse impacts associated with the large number of brownfield properties located in southeastern Iowa. Previous environmental site assessments have only scratched the surface for the potential to assess and redevelop properties. New funds will help communities and SEIRPC facilitate the acquisition of targeted sites knowing the significance of environmental impairment and the cost implications of these environmental concerns. Results of the assessments will assist redevelopment efforts within these communities, ensuring that plans envisioned for these areas eliminate or manage the environmental concerns while integrating land use concepts that are consistent with market needs and sensitive to the surrounding environment. These concepts may include mixed-use developments that feature energy saving technology and buildings using native and recycled materials.

Southeast Iowa previously received (2004) and completed an EPA Brownfield Assessment grant. The assessment grant has educated targeted areas and demonstrated how effective EPA grants can be in facilitating redevelopment for properties. For example, the former Ferro-Sil site in Keokuk, IA was assessed using the 2004 grant. The site is an 80-acre brownfield property formerly used in ferro-alloy manufacturing. It was recently purchased

and is now undergoing redevelopment planning as a trans-loading facility from barge to truck and as a wind power manufacturing site. This education and demonstration has in fact created more demand for the assessment funding from public and private entities, resulting in this application submission.

3. The southeast Iowa region, and the targeted communities in particular, have a high number of brownfield sites. EPA and INDR databases indicate that among the four largest cities in the southeast Iowa region, Burlington, Fort Madison, Keokuk and Mount Pleasant, there are approximately 263 EPA regulated facilities, 179 RCRA Hazardous Waste Generators, 94 Air Emissions sites, 40 NPDES sites, 37 Toxic Release Inventory sites, 37 Toxic Release Inventory sites, 8 CERCLA (superfund) sites and 4 sites with violations in the past 3 years. Additionally, the region also has 41 NRC spill sites and 8 IDNR hazardous waste sites.

Historically in the targeted communities, industrial facilities were often constructed in and near residential areas so that the workers could easily commute to work. As a result, many of the brownfield sites are located in predominately older residential areas where citizens are exposed to a disproportionate share of adverse conditions frequently associated with environmentally impaired properties. For example, exposure to airborne contaminants due to broken windows, diminished property valuations brought on by proximity to underdeveloped/blighted sites and a general lack of security around these facilities makes them predisposed to incidence of crime, temporary housing for homeless people and dangers for children in surrounding areas.

C. SITE SELECTION PROCESS

1. SEIRPC plans to use the grant to refine the assessment conducted on one larger property assessed using the 2004 EPA funding. Additional assessment on the Keokuk Prototype Foundry, a former site of alloy manufacturing, would be the main focus. Located in a prime industrial area in Keokuk, IA, the primary Phase II found elevated levels of chromium. More assessment needs to be performed on this substance to gain a more complete environmental snap shot of the property. These sites were determined eligible during the previous grant process.

New sites will be added to the hazardous assessment grant by way of a region-wide selection process focused on five cities in the region with the most perceived brownfield sites: Burlington, Fort Madison, Keokuk, Mediapolis and Mount Pleasant. The Task Force has been contacted and an initial scan of potential sites will be conducted during the grant evaluation period so that if the grant is awarded, the highest priority sites of the initial scan can be selected for assessment.

SEIRPC proposes the new sites for the assessment grants be prioritized with the following criteria (in no particular order):

- Proximity to residential areas
- Proximity to schools
- Proximity to public and/or private wells
- Potential for contamination
- Potential for environmental justice issues to surrounding residents

- Potential reuse of the site for economic development
- Potential reuse of the site for open/green space areas
- Potential for sustainable reuse, including redevelopment associated with renewable energy
- Current and historical use of the property
- Future or anticipated land use of the affected property
- Access to utility services
- Ability to secure access and/or access agreements on privately owned sites
- Threats to human health—either as an attractive nuisance or as threat for potential release of contaminants to the environment
- Status of property tax and/or municipal utility fee delinquencies

SEIRPC will determine, with assistance from and consultation with the EPA, the eligibility of specific sites that are identified by the task force.

2. Previous inventory activities centered around community input, solicited through the Southeast Iowa Brownfields Taskforce, formed to implement the Southeast Iowa Brownfields Initiative. SEIRPC also took the responsibility of obtaining insurance maps and maps from EPA and IDNR to establish locations and histories of potential brownfield sites. SEIRPC will continue to monitor brownfield sites consistent with these activities.

3. SEIRPC has negotiated seven separate access agreements using its 2004 EPA assessment grant, with four of those agreements being with private entities. SEIRPC has an access agreement template for brownfield assessment and experience gaining access to privately owned sites. A signed agreement example is included in Exhibit B from work under the 2004 EPA Assessment Grant.

Although SEIRPC would emphasize securing access agreements on an amicable basis, it would not rule out pursuing more involuntary means of securing access (i.e. condemn for temporary access). In the event that the agency would choose to pursue this alternative, SEIRPC would work closely with the city council or county board to determine what would be the most appropriate course of action.

D. SUSTAINABLE REUSE OF BROWNFIELDS

1. Redevelopment of urban brownfields reduces pollution and resource consumption by combating urban sprawl. Redevelopment of these properties supports infill development within existing urban infrastructure. These activities limit consumption of undeveloped land on the urban fringe and reduce oil consumption and air pollution by limiting the need for and length of automobile trips by co-locating housing, employment, and shopping in areas well-served by transit and amenable to walking and bicycling.

Redevelopment of brownfield sites also offers a unique opportunity for a community to redevelop sites in an environmentally friendly manner through green building techniques, storm water management, recycling of materials, reuse of infrastructure and energy efficient building techniques. One of the factors that SEIRPC will use to target sites for assessment is the potential for sustainable reuse of the brownfields sites. For instance, sites that leverage state and federal sources, like Iowa Department of Economic Development and USDA Rural

Development incentives for energy-efficient building and design, will be given extra weighting. Other project-specific factors that will influence a site's selection included the following.

- Conserving natural resources by minimizing the consumption of land (through compact development for example) and maintaining and restoring existing environmental attributes of development sites;
- Developing sites and designing buildings to reduce the consumption of energy and nonrenewable materials and the production of waste, toxic emissions, and pollution;
- Using existing and renewable urban resources such as underused buildings and sites, infrastructure systems already in place, and historic neighborhoods and structures;
- Designing developments to enhance a community's sense of place, livability, and social and economic interaction;
- Choosing and designing development sites in ways that increase access to jobs, affordable housing, transportation choices, and recreational facilities; and
- Creating developments that expand the diversity, synergism and use of renewable resources in the operation and output of local economic activities.

Specific to the area, Southeast Iowa is currently undergoing a biofuels and renewable energy boom, primarily associated with windmill manufacturing and biodiesel/ethanol facilities. Its proximity to large-scale agricultural production makes it an especially important area for biodiesel/ethanol. The area is uniquely poised with several mainline railroads, the Mississippi River and four lane highways to transport these products after manufacture. These new developments would be likely candidates for redeveloped brownfield properties.

2. As mentioned in section B.1., southeast Iowa has been subject to severe economic and demographic distress. The main focus of local governments and SEIRPC is economic development in the region. Many economic development programs have been established in the region over the past four years, including, but not limited to: Tax abatements, Enterprise Zones, Tax Increment Financing, the regional marketing initiative "Synergy Southeast Iowa", Vision Iowa Community Attraction and Tourism projects, trails and recreation areas, regional revolving loan funds for small businesses, and access to multiple state and federal programs.

Typically, brownfields in southeast Iowa are located in the most advantageous locations for commerce or recreation, as many sites to be redeveloped are near the Mississippi River or near transportation or business corridors. It greatly benefits the region to make these properties active once again. Redeveloped properties produce jobs, increase tax base, generate community investment and establish positive economic linkages. The type of redevelopment should be the highest and best use of the land; sometimes this is industrial, sometimes residential, sometimes parkland. It is probable that current industrial property

will remain industrial with the presence of infrastructure and utilities. However, one of the criteria for targeting sites is the creation of green space and public areas. For instance, a proposed project that includes reuse of a former riverfront industrial property as a park or public trail will receive extra weighting.

3. Southeast Iowa has some environmental justice concerns with some of its poorest and older population being located near brownfield sites, typically old industrial areas or gas stations. Redevelopment of the sites reduces the health risks associated with these areas and gives the surrounding disadvantaged residents the same opportunity for recreation, new affordable housing or other beneficial development. In redeveloping these brownfield sites, local governments in southeast Iowa often place an emphasis on projects that maintain, and often times enhance, an area's historic "feel." In this way, reuse of these brownfield sites results in vibrant communities with ties to their historic roots.

E. CREATION AND/OR PRESERVATION OF GREENSPACE/OPEN SPACE OR NONPROFIT PURPOSE

1. As mentioned in section D.3, some of southeast Iowa's poorest residents live adjacent to perceived brownfield areas, typically close to the Mississippi River or downtowns. The older housing stock correlates with lower rents and purchase prices, thus attracting lower income residents. These areas often serve as de facto buffers to newer residential and commercial areas. It would be a direct benefit to these residents to assess nearby brownfields with the possibility they would be redeveloped into greenspace areas. This is a distinct possibility with the criteria from C.1 "Potential reuse of the site for open/green space areas" being part of the site selection criteria.

The creation of greenspace along the Mississippi and near downtowns is slowly occurring with such initiatives as the Mississippi River Trail that connects 13 states from Minnesota to Louisiana, and traverses the downtowns and riverfronts of Burlington, Fort Madison and Keokuk. The potential for current brownfields to be used as greenspace is high given the right conditions, like availability of assessment funding. The redevelopment of brownfields also saves current greenspace from being developed, which is key in this agricultural area where arable land is the most valuable resource.

If any brownfields were developed into greenspaces and trail areas, they will be preserved and managed long-term by local interest groups and local governments. Several area trail groups are partnering with county conservation boards to establish greenspace areas already in southeast Iowa, such as the 15-mile Des Moines County Trail, which starts on the Burlington Riverfront, near several perceived brownfield sites. These areas would be managed by a public agency, with volunteers filling in with maintenance and creation of amenities to assure long term management and preservation of the areas.

F. PRE-AWARD COMMUNITY NOTIFICATION

1. SEIRPC will notify the region of the proposed assessment project during the pre-award period. SEIRPC will conduct the following operations to notify the community of its plans.

- Post the assessment application on the SEIRPC website (www.seirpc.com) in the brownfields section, established for the 2004 assessment grant;

- Include a story about the proposed assessment application in the SEIRPC quarterly newsletter, including information on how to access it;
- Post the application at regional libraries in Burlington, Fort Madison, Keokuk, Mount Pleasant and Mediapolis for public view
- Publish a public notice in regional newspapers to further notify the public of the assessment application

Each of these notification methods will provide a means of providing comment back to SEIRPC regarding its plans (typically a phone number and contact person).

2. The methods described above are believed to be effective ways to reach the southeast Iowa community because it relies on several media outlets to provide information to the general public. It also enables people that may or may not have internet access or newspaper subscriptions to access the application. These methods have also successfully solicited public input during the 2004 EPA assessment project.

3. A comment period of 30 days will be proposed to give the community ample opportunity to comment on the proposed plans. It will be specifically mentioned that comments are acceptable at any time, as well. The bullet-point plan listed above will be utilized to spread information on the comment period to the region. Any comments outside of this time period will also be documented and addressed.

4. Any comments received will be documented and posted on the SEIRPC website and distributed to area libraries mentioned in F.1. This information will be passed on to communities, if directed specifically at one, with a recommendation from the Brownfields Task Force on how to address the comment.

G. ONGOING COMMUNITY INVOLVEMENT

1. SEIRPC will inform the regional communities about brownfields in general and assessment projects. The plan will generally follow the bullet point plan below:

- Conduct outreach meetings in brownfield communities with prior advertisement on radio and in print media; the outreach meetings will focus on brownfield education and current assessment grant information;
- Include a section on brownfields in every SEIRPC quarterly newsletter, sent out to hundreds of entities in southeast Iowa, in the state of Iowa, federal and state elected officials and federal and state agencies;
- Maintain the brownfields section of the SEIRPC website with information on brownfields in general, resources and create descriptions of current assessment projects;
- Advertise all Taskforce Committee meetings to the general public via the SEIRPC website and public notices in a regional newspaper.

The following activities will be conducted if an assessment grant is awarded:

- Each of the Taskforce meetings is advertised to the general public;

- In addition to the initial comment period after the grant was awarded, outreach meetings will be held in targeted cities in southeast Iowa;
- Develop print media and radio media opportunities to market and educate the region on the assessment project;
- Conduct presentations to brownfield sites' city councils during Earth Week;
- Hold school outreach events to educate K-8 children on brownfields and brownfield cleanup activities;

2. Due to the success of the current assessment grant, quality partnerships have been forged at the state and federal level with Region 7 EPA and IDNR. This is evidenced by a letter from IDNR supporting an RLF project in southeast Iowa and continuing support from Region 7 EPA. During or after any activities resulting from an assessment, SEIRPC will consult early and often with IDNR and EPA Region 7 to ensure that any cleanup or redevelopment is done in a sustainable manner.

Further partnerships have already been established with current SEIRPC Taskforce Committee members who will have a direct effect on the knowledge of the brownfields assessment program within the region.

SEIRPC plans to keep communications open and discuss in detail its communities' plans for redeveloping brownfield with local, state and federal agencies. Communications with local interest groups, like Sierra Club, Izaak Walton League, and trail groups will be kept open and initiated to garner participation.

3. It will be necessary to keep citizens involved on a regular time-interval instead of as-needed. Residents whose primary languages are not English, or those that have disabilities, must also be kept informed. In addition to the bulleted items in G.1, the following activities will be performed to keep residents informed of brownfield progress:

- Hispanic translations will be on request, given the very small percentage of Hispanic speakers in the region (less than 2% in the targeted communities according to the 2000 US Census). There are no other significant percentages of non-English speakers, but requests for information will be handled with due diligence and full practical accommodation;
- Other persons with sight and hearing disabilities will be accommodated as well, with large print documents available and audio recordings of meetings or of spoken documents, on request

4. Community-based organizations:

- Lee County Economic Development Group: Mr. Tim Gobble, Vice President, 319.463.5599
 - o LCEDG is charged with developing new economic opportunities in Lee County, with the most focus being towards attracting new businesses to the county.
- Grow Greater Burlington (Burlington/West Burlington Chamber of Commerce), Mr. Dennis Hinkle, President and CEO, 319.752.6365

- These organizations serve the business community in Burlington and greater Des Moines County. The most common activities are business attraction and retention, legislative and lobbying services and community development.
- ☐ Fort Madison Chamber of Commerce, Mr. Tracy Vance, Executive Director, 319.372.5471
 - The Fort Madison Chamber serves the business community in greater Fort Madison and provides business and legislative services.
- ☐ Keokuk Economic Development Corporation, Mr. Allen Zastrow, President, 319.463.5599
 - KEDC is charged with granting money sourced from riverboat gambling operations as well as developing incentives for prospective businesses.
- ☐ Fort Madison Economic Development Corporation, Mr. Robert Winkler, President, 319.463.5599
 - FMEDC is the sister organization to KEDC but in Fort Madison.
- ☐ Keokuk Chamber of Commerce, Ms. Katie O'Brien, Director, 319.524.5055
 - The Keokuk Chamber serves the greater Keokuk business community and provides business and legislative services.
- ☐ Alliant Energy, Mr. Gary Williams, Economic Development Manager, 319.786.4277
 - Alliant Energy is one of two large energy companies serving southeast Iowa and is a critical economic development partner for the region.
- ☐ Mid American Energy, Mr. John Wetzel, 563.333.8810
 - MidAmerican Energy is one of two large energy companies serving southeast Iowa and is a critical economic development partner for the region.

H. REDUCTION OF THREATS TO HUMAN HEALTH AND THE ENVIRONMENT

1. If awarded this grant, SEIRPC will expend the majority of the funds to investigate (Phase I and Phase II) former commercial and/or industrial properties with hazardous substance assessment funds where environmental conditions of the soil, buildings and groundwater are not known or, in the case of sites previously assessed, are not known sufficiently to make a determination regarding human health and the environment. For sites not assessed using the 2004 grant, environmental professionals hired to conduct assessment will be required to adhere to ASTM E 1527-05 and the federal All Appropriate Inquiries Final Rule to ensure that the highest degree of environmental due diligence is conducted.

Once data is available and analyzed as part of a Phase II assessment, more will be known about the site and the potential health risks it poses to human health and the general environment. Not only will information regarding the presence and levels of contamination, if present, provide property owners with the information necessary to obtain environmental closure, but it will also identify potentially serious environmental risks that may be affecting community residents, and disproportionately affecting residents of adjacent neighborhoods. If immediate threats are found, SEIRPC will notify the IDNR and take the steps necessary to have the appropriate local government secure the site and limit access. Local health departments will also be consulted on next steps to prevent any adverse effects from the hazardous substances. If these types of threats are identified on sites near or adjoining the Mississippi River, the Corps of Engineers may also be consulted regarding the risks posed to this major water body. Additionally and if warranted, SEIRPC may draw on the resources of

members of the Southeast Iowa Brownfields Taskforce, which represent business-based organizations (e.g., chambers of commerce) in the communities served.

SEIRPC, through an environmental consultant, will evaluate assessed properties consistent with the IDNR's Land Recycling Program, a voluntary cleanup program that establishes standards and methods that are protective of varying land uses and populations. For instance, separate cleanup levels are established for residential and commercial/industrial populations. The Land Recycling Program also includes procedures to establish cleanup levels for other types of land use, such as public use. The IDNR program also takes into account engineering and institutional controls when developing standards. Maintenance of these controls is ensured through an environmental covenant process whereby the IDNR is made a party to the control(s).

2. As stated earlier in the proposal, representatives from county health agencies will be kept in communication as results of assessments become available. Moreover, SEIRPC will solicit the involvement of county health agencies in meeting the requirements of the National Contingency Plan and providing input in the preparation of the Land Recycling Program application(s). The IDNR Land Recycling Program Cleanup Standards are based on risk-based exposure and would be closely followed as part of any cleanup effort. IDNR Contaminated Sites Bureau staff will also be closely involved to ensure the protection of public health and that appropriate regulations are followed.

I. LEVERAGING ADDITIONAL RESOURCES

1. In SEIRPC's experience with the 2004 EPA Assessment grant, the money provided to perform Phase I and II assessments was adequate for a limited number of sites. Therefore, this application is requesting additional funds to perform more assessments to facilitate redevelopment and/or mitigation in Southeast Iowa, due to the additional demand the initial grant has caused for such activities. However, the funding shortfalls that were covered by local sources lie mostly in personnel costs.

SEIRPC does pledge that it will have the available staff to perform the duties central to the execution and administration of the grant, and some of these activities will not necessarily be paid for by the grant. SEIRPC will not charge (since it is not an allowable cost) indirect activities to this grant; SEIRPC will pull from local funding sources to cover this shortfall, which come from cities and counties, and is used as local match for various grants and activities. In-kind labor will be in the form of the Brownfields Task Force, which does not receive any direct compensation for conducting the duties of the task force. Therefore, significant local contributions from SEIRPC in the form of local cash and from Task Force members in the form of in-kind labor will make this grant financially successful.

As an example of local commitment, the Keokuk FerroSil site in the 2004 EPA Assessment grant assessment program has required further Phase II analysis, outside of what was budgeted in the EPA Assessment. Local sources have covered the cost, coming from the municipal general fund and the county economic development group budget, and also local general fund revenue. Local sources covered the cost because of a unique development opportunity that would greatly benefit the community, in a proposed wind turbine tower

manufacturing. SEIRPC believes that other cities and counties would do the same in a similar situation or to further the redevelopment of a property.

2. SEIRPC and current brownfield communities have already leveraged local funds to identify the brownfield sites assessed with the 2004 EPA Assessment grant. SEIRPC also has vast experience in using local, state or federal dollars to leverage other dollars for economic development, community development, transportation and infrastructure projects. SEIRPC is the stop in southeast Iowa for communities seeking grant money or financing proposals to make projects happen. However, to continue the progress of brownfield redevelopment, many funding and incentives sources will be available to be leveraged.

Some examples include:

- Enterprise Zone tax incentives: Targeted communities in southeast Iowa have at least one Enterprise Zone that covers most typical brownfield areas; two communities have Transportation Enterprise Zone designation along with the typical Enterprise Zone designation. These zones allow for tax deductions and credits for job creation and investment in these areas; At least \$5 million in potential benefits are available
- Tax Increment Financing/Urban Renewal Areas: Brownfield communities also have this incentive available for their use to encourage redevelopment or further assessment; recently, approximately \$2 million was leveraged by a TIF district in Fort Madison to attract a manufacturing facility;
- Surface Transportation Program funds from the Federal Highway Administration will be pursued to develop corridor reuse plans that will leverage off of existing trail and greenway corridors to encourage sustainable redevelopment; Approximately \$1.5 million is available annually;
- SEIRPC also administers and promotes a Revolving Loan Fund to provide low-cost gap financing at favorable lending terms to qualified businesses that want to expand or locate in the region. SEIRPC will encourage the use of this fund to assist in the assessment and redevelopment of brownfield sites; the current loan portfolio is approximately \$2 million;
- SEIRPC will also encourage and facilitate use of the Iowa DNR Brownfield Revolving Loan Fund to encourage redevelopment;
- Economic development funding: Through the Economic Development Administration and the Iowa Department of Economic Development, not to mention the USDA, SEIRPC has experience accessing funds from programs administered by these state and federal agencies. Brownfield redevelopment will no doubt include a component of economic or open space development, which these agencies are specifically involved in.

J. PROGRAMMATIC CAPABILITY

1. SEIRPC has 33 years of grant management and administration experience. SEIRPC has managed grants from federal and state governments total in the tens of millions of dollars. SEIRPC was awarded an EPA Assessment grant in 2004, and has successfully managed the \$400,000 of funding allocated for hazardous substances and petroleum assessment. SEIRPC completed the prior assessment grant consistent with EPA guidelines and has had a successful relationship with EPA Region 7. SEIRPC completed all of the

assessments within the allotted time period. SEIRPC also has never had an adverse finding on an annual audit, including federal, state and self-imposed audits.

Significant accomplishment during the prior EPA assessment grant award:

- Forming a regional Brownfields Taskforce when none had ever been attempted;
- Gaining buy-in from cities and counties on the project where no brownfields projects had ever been attempted;
- Signing access agreements with seven entities that had never dealt with EPA Brownfields projects before;
- Successfully procuring a consultant consistent with federal rules and working successfully with the consultant to keep the project on time and on budget;
- Meeting and exceeding all EPA reporting requirements and public outreach (we have received only positive feedback from EPA Region 7 on quarterly reports or public outreach efforts);
- Successfully educating the southeast Iowa area about Brownfields enough so that additional demand has been created for new assessment funding
- Using assessment information to facilitate the sale and imminent redevelopment of the Ferro-Sil property in Keokuk, IA, formerly used in the manufacture of ferrous metals for use in metal alloys;

SEIRPC will keep its current brownfields project manager, Mike Norris, to manage the proposed EPA Assessment grant and direct its development. Mike has EPA grant implementation experience from working on the 2004 EPA assessment grant awarded to SEIRPC along with three and a half years of other state and federal grant management.

2. As described above, SEIRPC has 33 years of managing federal funding. SEIRPC has experience with Federal Transit Administration, Federal Highway Administration, Economic Development Administration, Dept of Housing and Urban Development, the Homeland Security Administration, US Dept of Agriculture, and others. In its 33 year history, SEIRPC has never been found to have an adverse audit findings or adverse findings from OMB Circular A-133 audits. SEIRPC has an excellent and demonstrated history of managing pass through and direct grant dollars. SEIRPC also has never been asked to comply with any "high risk" terms and conditions under agencies implementing OMB Circular A-102. SEIRPC has managed tens of millions of dollars in its history of state and federal funding. In FY2005, SEIRPC managed or administrated over \$4 million in state and federal funding. Over 50% of this figure is federal funds from a variety of agencies.

3. Since it was granted EPA funding for FFY 2004, SEIRPC has complied with every reporting and compliance regulation governing its award. Quarterly progress and financial reports along with annual reports have all been filed on time and in their entirety.

SEIRPC asked for an extension on its 2004 grant award due to the unique site conditions present at a very large brownfield site and the initial difficulty in educating persons and entities in southeast Iowa about the EPA brownfield assessment program. However, SEIRPC was persistent and successful in securing seven access agreements to sites for Phase I and II assessments. The projects were completed well before the extension deadline. This

information demonstrates that SEIRPC makes good on its assessment projects; especially for an assessment project in a rural region of Iowa that has had little prior brownfields exposure.

4. SEIRPC will track and measure progress during the proposed assessment grant by evaluating its progress every quarter with all measurable aspects of its project, including: public outreach, site access agreements, completion of Phase I and II assessments, number of acres ready for development and percentage of funding spent. These are all measurable items and will provide the most accurate picture of the project's progress.



STATE OF IOWA

CHESTER J. CULVER, GOVERNOR
PATTY JUDGE, LT. GOVERNOR

DEPARTMENT OF NATURAL RESOURCES
RICHARD A. LEOPOLD, DIRECTOR

September 17, 2007

Susan Klein
EPA Region VII
901 N. 5th St.
Kansas City, KS 66101

RE: Southeast Iowa Regional Planning Commission (SEIRPCO), Iowa
Community-wide Brownfield Hazardous Substance Assessment Grant Application

Dear Susan:

This letter is submitted as a statement of acknowledgement, review and support for the Southeast Iowa Regional Planning Commission's (SEIRPCO) community-wide brownfield assessment grant application, through funding authorized by §104(k) of CERCLA. This application and brownfield assessment initiative is designed to address hazardous substances at former industrial and commercial properties in the multi city-county region of SEIRPCO's community planning and development area.

SEIRPCO's region, population 113,000, has seen a downward trend in many demographics that monitor community vitality. Over the past 4 years, approximately 25% of the jobs within the region's manufacturing sector have been eliminated, due to downsizing, buy-outs, and other outsourcing of jobs and production. Unemployment has dramatically increased, and many former industrial and commercial sites have been left vacant. Overall population in the region has had a negative growth rate over the last 10 years.

The perception of environmental contamination has been a deterrent to redevelopment at many sites within SEIRPCO's region, and a grant-funded assessment would assist SEIRPCO in facilitating the proper environmental evaluation and cleanup of these properties, and stimulate positive redevelopment and reuse options in this region.

The department appreciates the opportunity to have reviewed this project and its goals, and we support the brownfield assessment and redevelopment strategies as presented in this application.

Sincerely,

A handwritten signature in black ink, appearing to read "Mel Pins", written in a cursive style.

Mel Pins
Executive officer
Iowa Brownfield Redevelopment Program
Geological Survey and Land Quality Bureau



200 Front Street, Suite 400
Burlington, Iowa 52601

Tel: 319.753.5107
Fax: 319.754.4763
Website: www.seirpc.com

Temporary Site Assessment Access Agreement

THIS ACCESS AGREEMENT (the "Agreement"), dated as of May 2, 2005, made and entered into by and between Twin Rivers Holdings, LLC, a Delaware limited liability company having an address at c/o Glencore Ltd., 3 Stamford Plaza, 301 Tresser Boulevard, Stamford, CT 06901-3244, hereinafter referred to as the "GRANTOR" and the Southeast Iowa Regional Planning Commission, a general purpose unit of local government, 200 Front Street, Suite 400, Burlington, Iowa, hereinafter referred to as the "SEIRPC."

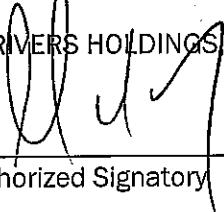
FOR THE PARTIES' JOINT AND MUTUAL CONSIDERATION IT IS HEREBY AGREED AS FOLLOWS:

1. That the undersigned GRANTOR is the lawful possessor of certain real estate of the former Keokuk Ferro-Sil, Inc., the owner of certain real estate is generally located at, (2301 Twin Rivers Drive, Keokuk, Iowa 52632), hereinafter referred to as the "Property".
2. The GRANTOR hereby conveys to the SEIRPC, its employees, representatives, agents, contractors, access to the PROPERTY identified in section 1 of this Agreement, for the purpose of conducting reconnaissance, owner or key site manager interviews, and/or environmental sampling activities (collectively, the "Activities"). These Activities may include the collection of surface and subsurface soil and water samples. Access to subsurface samples may be through drilling holes, removing soil, installation of monitoring wells, removal of groundwater, and removal of well materials. The ground surface will be restored to substantially the same condition prior to sampling, except for reasonable and customary condition associated with such testing. Such Activities shall be limited in purpose and scope to the least amount of access which is required to undertake and complete the aforesaid Activities.
3. That the individual or individuals executing this Agreement on behalf of the GRANTOR has/have no objection to grant the access rights conveyed to the SEIRPC herein.
4. SEIRPC hereby assumes any and all risks associated with the Activities to be conducted by SEIRPC at the Property and shall indemnify, defend and hold harmless the GRANTOR from and against any and all liabilities, claims, demands, suits, administrative proceedings, causes of action, penalties, fines, liens, fees, costs (including reasonable attorney's fees and costs), damages at law or in equity ("Claims") arising from the SEIRPC'S presence of Activities on the Property, unless such Claims are caused by the negligence or willful misconduct of the GRANTOR. SEIRPC shall maintain for the term of this Agreement and for one (1) year thereafter, insurance policies covering all Activities at and related to the Property of the type and minimum amounts as shall be reasonably required by GRANTOR with GRANTOR being named as an additional insured on the aforementioned policies.
5. That the SEIRPC shall access the Property during regular business hours, unless otherwise agreed to by the GRANTOR

6. SEIRPC shall use best efforts to avoid disrupting any activities on the Property while the SEIRPC conducts the aforementioned site assessments.
7. Access granted and conveyed herein to the SEIRPC shall automatically expire upon completion of the Activities on the Property.
8. ALL COSTS AND EXPENSES FOR COMPLETION OF THE ENVIRONMENTAL SITE ASSESSMENT ACTIVITIES OR ENVIRONMENTAL SITE ASSESSMENTS SHALL BE THE SOLE RESPONSIBILITY OF THE SEIRPC.

Dated this 2nd day of May, 2005.

TWIN RIVERS HOLDINGS, LLC



An Authorized Signatory

An Authorized Signatory
(If applicable)

SOUTHEAST IOWA REGIONAL PLANNING
COMMISSION



Executive Director

An Authorized Signatory
(If applicable)

Iowa Code, 2005 Merged Supplement

28H.1 Councils of governments established.

For purposes of this chapter, a council of governments includes the following areas established by executive order number 11,1969 or a chapter 28E agreement:

1. Upper explorerland **regional** planning commission serving Allamakee, Clayton, Fayette, Howard, and Winneshiek counties.
2. North **Iowa** area council of governments serving Cerro Gordo, Floyd, Franklin, Hancock, Kossuth, Mitchell, Winnebago, and Worth counties.
3. Northwest **Iowa** planning and development commission serving Buena Vista, Clay, Dickinson, Emmet, Lyon, O'Brien, Osceola, Palo Alto, and Sioux counties.
4. Siouxland interstate metropolitan planning council serving Ida, Monona, Plymouth, Woodbury, and Cherokee counties.
5. MIDAS council of governments serving Calhoun, Hamilton, Humboldt, Pocahontas, Webster, and Wright counties.
6. Region six planning commission serving Hardin, Poweshiek, Tama, and Marshall counties.
7. **Iowa** northland **regional** council of governments serving Black Hawk, Bremer, Buchanan, Butler, Chickasaw, and Grundy counties.
8. East central intergovernmental association serving Cedar, Clinton, Delaware, Dubuque, and Jackson counties.
9. Bi-state metropolitan planning commission serving Scott and Muscatine counties.
10. East central **Iowa** council of governments serving Benton, **Iowa**, Johnson, Jones, Linn, and Washington counties.
11. Region twelve council of governments serving Audubon, Carroll, Crawford, Greene, Guthrie, and Sac counties.
12. Southwest **Iowa** planning council serving Cass, Fremont, Harrison, Montgomery, Page, and Shelby counties.
13. Southern **Iowa** council of governments serving Adair, Adams, Clarke, Decatur, Madison, Ringgold, Taylor, and Union counties.
14. Area fifteen **regional** planning commission serving Appanoose, Davis, Jefferson, Keokuk, Lucas, Mahaska, Monroe, Van Buren, Wapello, and Wayne counties.
15. **Southeast Iowa regional** planning commission serving Des Moines, Henry, Lee, and Louisa counties.
16. Metropolitan area planning agency serving Mills and Pottawattamie counties.

90 Acts, ch 1157, §1; 90 Acts, ch 1262, §40

Boone, Dallas, Jasper, Marion, Polk, Story, and Warren counties, or combinations of these, may form councils of governments or associate with any existing councils of governments; 90 Acts, ch 1157, §6; 90 Acts, ch 1262, §41