

FY 2024 UNITED STATES ENVIRONMENTAL PROTECTION
AGENCY BROWNFIELDS CLEANUP GRANT APPLICATION

Narrative Information Sheet

R03-24-C-001

November 10, 2023

1. Applicant Identification

Enterprise Development Center of Erie County
1314 Griswold Plaza
Erie, PA 16501

2. Funding Requested

- a) Grant Type: Multiple Site Cleanup
- b) Federal Funds Requested:
 - i. \$5,000,000

3. Location: a) Erie, b) Erie, and c) Pennsylvania

4. Property Information:

- Former Erie Modern Industries, 603-643 West 12th Street, Erie, PA 16503-1343
- Former Quin T Site, 140 East 16th Street, Erie, PA 16503-1861

5. Contacts:

a) Project Director:

Ti Sumner, Brownfield Consultant/Project & Grant Manager
Enterprise Development Center of Erie County
1314 Griswold Plaza
Erie, PA 16501
Phone: 814-480-0337 ext. 202
Email: tsumner@ecrda.net

b) Chief Executive:

Tina Mengine, Executive Director
Enterprise Development Center of Erie County
1314 Griswold Plaza
Erie, PA 16501
Phone: 814-480-0337 ext. 101
Email: tmengine@ecrda.net

6. Population:

The Enterprise Development Center of Erie County covers the entirety of Erie County, Pennsylvania. The County's population according to the 2022 US Census (estimates) was 267,689.

7. Other Factors

Other Factors	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resources identified in the Narrative and substantiated in the attached documentation.	3
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	
The priority site(s) is in a federally designated flood plain.	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy efficient measures.	2
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	2
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Releasing Copies of Applications

Not applicable

Thank you for your consideration,



Tina Mengine, Executive Director
Enterprise Development Center of Erie County

1.a.i. Overview of Brownfield Challenges and Description of Target Area: Erie County is located in rural northwestern Pennsylvania along the shores of Lake Erie. It has a long and proud history of agriculture and manufacturing and was an important location for the Underground Railroad. Historically, Erie County was a center for shipbuilding, fishing, and a hub for rail commerce. Like much of western Pennsylvania, the county became a center for iron and steel manufacturing which relied heavily on the local coal industry. Steel, heavy manufacturing, and the associated rail industry fueled economic and population growth for most of the 20th Century. However, shifting trends in these industries in the late 20th Century have had negative impacts on the county's economy and quality of life. Industrial manufacturing operations have closed or relocated, rail commerce has declined, and reliance on coal has significantly diminished. These industries were the backbone of the county's economy and with them, so too went the jobs and prosperity that had allowed the county to thrive and prosper. Due to these manufacturing plant closures, since 2001, Erie has experienced an estimated 62% decrease in manufacturing jobs, including nearly 2,000 in the past four years, with hundreds more expected from Wabtec (formerly GE), Erie's #3 employer (PA Department of Labor & Industry). The Enterprise Development Center of Erie County (EDCEC) is committed to re-establishing Erie in the modern economy. However, the deep-rooted legacy of industrial manufacturing has created a landscape of blighted, underutilized, and abandoned properties that represent a disproportionate burden on disadvantaged communities.

The cleanup of two sites targeted for this grant funding, former Erie Malleable Iron (EMI) Site and former Quin T Site, will significantly correct the legacy of environmental impacts not only in the communities most directly affected but also the entire county. The two targeted sites were identified as priority reuse sites in every Erie City and County redevelopment plan. These sites are located in primary commercial corridors within residential neighborhoods tied into the fabric of the City. During the height of their operations, they provided hundreds of good paying jobs and tax revenue to the City and County. The EMI site was a former foundry, and the Quin T site was an asbestos shingle manufacturer. These two brownfield sites are located within Climate and Economic Justice Screening Tool identified disadvantaged communities in close proximity to churches, community centers, and schools. These sites were assessed using EPA Brownfields grant funding, which identified significant impacts to both soil and groundwater from solvents, volatile organic compounds, and metals. EDCEC purchased these sites for the purpose of redevelopment to spur revitalization and has produced redevelopment plans for both sites. While EDCEC has leveraged grant funding from numerous sources in excess of \$16 million for the demolition, architectural design, engineering design, and construction, the significant environmental contamination uncovered during EPA Brownfields grant funded assessment has presented additional financial obstacles. The Quin T site, in which 95% of buildings and smokestacks have been demolished, is slated to be developed into recreational fields for disadvantaged, low-income communities who have lived in close proximity to this vacant and contaminated site for decades. EMI underwent selective demolition, with the remaining structures to be converted into modern, multipurpose workspace and community green space. The cleanup and planned redevelopment of these sites is critical to the revitalization of the City and County redevelopment plans.

1.a.ii. Description of the Brownfield Sites: The former Quin-T facility manufactured asbestos products, including roofing, building, and automotive materials from the mid-1800s until the early 2000s. The site contained a manufactured gas plant and numerous tank farms with several large ($\geq 20,000$ gallons) underground storage tanks, a former asbestos processing building, and a network of wastewater collection features. This brownfield site is located within a disadvantaged community and has long been associated with trespassing, arson, vagrancy, and vandalism. The illegal activities which have been occurring on this vacant site have created a precarious atmosphere for community children and have further depressed housing values in this community. Using US EPA Brownfields Assessment grant funding, environmental assessments were completed. A Draft Phase II Environmental Site Assessment was completed in October 2023 and a remedial strategy was developed for identified environmental impacts, including polycyclic hydrocarbons and metals impacting soils and groundwater. EDCEC has an agreement of sale for this site with a local charter school. The planned redevelopment includes recreational fields for the school. The agreement of sale is pending the appropriate environmental cleanup and closure for recreational use (residential standards) under the Pennsylvania Voluntary Cleanup Program (VCP). The site was entered into the Pennsylvania Department of Environmental Protection (PADEP) VCP in 2023.

The EMI Site is a former iron foundry and manufacturing facility that also operated as an electronics parts facility until the early 2000s, since that time the site sat vacant. Demolition of the site was initiated in 2022 and all buildings except for the eastern office building and former foundry were razed. In 2023 a Phase II ESA, funded by a US EPA Brownfields Assessment grant was completed. Soil results identified the following constituents of concern at concentrations above the Pennsylvania Department of Environmental Protection (PADEP) Soil Standards: tetrachloroethene (PCE), trichloroethene (TCE), and polychlorinated biphenyls (PCBs). Groundwater

results identified PCE concentrations exceeding the PADEP Groundwater Standards. The planned reuse of this site includes modern office space with the potential for LEED certification. The EDCEC has several letters of intent from Erie-based companies to move into this space, including Amicangelo & Theisen (Law Firm), Infinite Erie (Erie Economic Development Non-Profit), and the Erie County Redevelopment Authority. Due to identified contamination, cleanup funding is needed to make this transformation a reality and grow jobs that pay well in Erie. The planned redevelopment of this site will immediately create new jobs, remove blight, and provide safe open recreational spaces for the community. The site was entered into the Pennsylvania Department of Environmental Protection (PADEP) Voluntary Cleanup Program (VCP) in 2023. The targeted sites are both located within 1 mile of Lake Erie and contain identified groundwater impacts. Lake Erie is the sole drinking water source for the community, and cleanup of these sites would remove a known and ongoing source of contamination from Erie County watershed.

1.b.i Reuse Strategy and Alignment with Revitalization Plans: The Erie Refocused (City), Erie Inclusive Reinvestment Playbook, and the Garner Report – Target Industries Strategies, all concluded Erie is grossly lacking office modern workspaces and cannot grow as a region without these resources. These reports further targeted the 12th Street Corridor, where EMI is located, as a major industrial manufacturing hub which had undergone a significant downturn with thousands of layoffs of good paying jobs. Quin T was targeted due to its location near downtown and proximity to residential neighborhoods and schools. These long-term capital improvement, community revitalization, and hazard mitigation plans have all identified brownfields as priority targets to meet their goals. A priority recommendation of these plans is to target the removal or rehabilitation of distressed properties to encourage reinvestment in these communities. These plans were developed by both Erie County and the City of Erie using extensive and targeted input from residents and community organizations that are directly impacted by the blight and environmental legacy of these brownfields, as well as the stakeholder listed herein. Overall, the goals of these plans are to promote responsible development and reuse of existing brownfields sites, protect Lake Erie by mitigating environmental hazards in the coastal zone, encourage sensible growth throughout the county by utilizing existing public utility infrastructure, and to provide greenspace access to disadvantaged and sensitive populations. The cleanup and redevelopment of these two brownfields sites will restore their potential as both economic and community resources and will allow the EDCEC to support goals and objectives outlined in every local revitalization plan. EDCEC’s planned redevelopment of these priority brownfields sites align with the goals and vision of all the various City and County comprehensive plans. While these sites are not located in federally identified flood plains, due to climate change, precipitation events have intensified causing increased localized flooding events.

1.b.ii Outcomes and Benefits of Reuse Strategy: A major goal of the City of Erie’s Comprehensive Plan is to develop the City into a stronger regional core, and to accomplish this, all City communities must benefit from the regional revitalization plans in both economic and non-economic capacities. Redevelopment of the target sites – the former EMI and Quin T – will do just this by mitigating existing hazardous conditions and creating jobs, opportunities, and recreational space for the entire region, and specifically the distressed neighborhoods most directly affected by these sites. The former QUIN-T site, which sits within the city’s Trinity Park neighborhood, is an identified Climate and Economic Justice Screening Tool (CEJST) “Disadvantaged Community.” EDCEC has an agreement of sale with the local Charter School, which plans to utilize this site for the creation of much needed recreational fields for this EJ community. The agreement is dependent on the cleanup of the site, which will remove identified soil and groundwater contamination to facilitate the creation of planned recreation fields. The EMI site was identified in every redevelopment and reuse plan as centrally vital to the overall revitalization of Erie’s workforce, based on location, high visibility, ease of access, current infrastructure, and the identified regional need for modern workspace to attract and retain new businesses. EDCEC has leveraged millions in grant funding for cleanup and restoration of these sites. The planned EMI redevelopment includes energy efficient LEED certified construction practices and the focused attempt to employ local contractors. The benefit of the cleanup of this site will directly follow through on every reuse strategy goal while immediately providing a cleaner, more attractive landscape and business-ready 5-acre, prime City site on Erie’s main thoroughfare. Although EDCEC anticipated some financial burden respective to the cleanup effort at both sites, the extent of identified contamination has presented an obstacle to the clear plans and timelines of both projects. Without EPA Brownfields Cleanup funding, the Charter School and EDCEC will seek other funding sources, which will place several secured grant sources for construction activities in jeopardy of funding loss due to time restrictions. Securing the EPA Brownfields Cleanup Grant will place EDCEC, the Charter School, and the Erie community well being in the best position for project completion and success.

1.c.i. Resources Needed for Site Characterization: Utilizing US EPA Brownfields Assessment grant funding, Phase II ESAs were completed for both the Quin T and EMI sites. Each of the sites targeted for these cleanup

funds have been characterized, with limited data gaps remaining. Funding remains in the current US EPA Brownfields Assessment grant, awarded to the Erie County Industrial Authority (ECIDA). In addition to County-wide assessment activities, ECIDA has committed to utilizing the remaining US EPA Brownfields Assessment grant funds to complete the limited characterization of these sites to support the planned cleanup. To that end, the characterization will be completed for both sites prior to June 15, 2024.

1.c.ii Resources Needed for Site Remediation: Regional long-term capital improvement, community revitalization, and hazard mitigation plans have all identified brownfields as priority targets to meet their goals. EDCEC has a demonstrated record of acquiring the external resources necessary to lead a successful brownfields cleanup/redevelopment program. Two recent examples demonstrating EDCEC’s ability to secure additional resources are summarized below.

- Pennsylvania Office of the Budget, Redevelopment Assistance Capital Program (RACP) – EDCEC secured \$2 million RACP grant in 2020 to fund a priority site previously assessed by a US EPA Brownfields Assessment grant to construct a 90,000-sqft warehouse facility.
- Pennsylvania Department of Community and Economic Development (DCED), Industrial Sites Reuse Program (ISRP) – EDCEC received ISRP funding of \$600,000 for the above-mentioned project, a former scrapyards site within the City of Erie, to remediate environmental impacts in accordance with Pennsylvania Act 2 requirements.

EDCEC recognizes the funding available from the US EPA is not adequate to complete remediation at both sites. Conservative cost estimates for remediation of EMI alone are approximately \$8 million. However, EPA funding will allow for the removal and disposal of soils with the highest levels of contamination and will provide considerable cost match for additional funding sources. The aforementioned funding sources remain available, with matches of 20% and 50%, for ISRP and RACP, respectively. In addition to direct cleanup funding, EPA Brownfields Cleanup funding will therefore provide EDCEC with the means to obtain the additional funding necessary to complete remediation and obtain Act 2 Clearance.

1.c.iii Resources Needed for Site Reuse

Name of Resource	Is the Resource for (1.c.i.) Assessment, (1.c.ii.) Remediation , or (1.c.iii.) Reuse Activities	Is the Resource Secured or Unsecured	Additional Details or Information About Resource
US EPA Brownfields Assessment Grant	1.c.i. Assessment	Secured	Environmental Assessment Completed 2021 EMI - \$33,000 Quin T - \$42,000
US EPA Brownfields Assessment Grant	1.c.i. Assessment	Secured	Environmental Characterization Completed 2023 EMI - \$158,130; Quin T - \$169,660
Erie County American Rescue Plan Funding (ARP)	1.c.ii. Remediation	Secured	Hazardous Waste Removal Completed 2021-2024 EMI - \$207,768; Quin T - \$226,959
Erie County ARP	1.c.iii Reuse Activities	Secured	Design, Engineering, Demolition, & Legal Completed 2021-2024 EMI - \$2,659,247; Quin T - \$579,686
Pennsylvania Redevelopment Assistance Capital Program	1.c.iii. Reuse Activities	Secured	Engineering Design, Architectural Design, and Construction- 2024-2026 EMI - \$7,000,000
Private Funding	1.c.iii. Reuse Activities	Unsecured	Engineering Design, Architectural Design, and Construction 2025 – 2027 Quin T - \$3,500,000

1.c.iv. Use of Existing Infrastructure: EDCEC has evaluated existing physical and utilities infrastructure in the area surrounding the EMI and Quin T sites as part of redevelopment planning. This analysis was conducted using US EPA Smart Growth concepts and data-driven tools such as Geographic Information Systems (GIS) to guide planning and implementation of the cleanup and planned redevelopment of both sites. To mitigate increasing flooding concerns resultant of changing weather patterns, EDCEC will install a modern storm water drainage system as part of the EMI redevelopment. Both sites will otherwise successfully connect to existing infrastructure

and utilities grids. Regarding transportation infrastructure, the evaluation similarly concluded that existing roadways are sufficient for the planned redevelopment of both sites. The redevelopment planning targeting both sites also considered reduction of greenhouse gases and walkability, with both sites located within a block of Erie Metropolitan Bus Lines and walkable to the center City. In the event that additional infrastructure needs are identified, EDCEC has extensive experience in leveraging state funding such as the PA Redevelopment Assistance Capital Program (RACP), which EDCEC has used for such infrastructure and site improvements in the past.

By utilizing existing infrastructure, EDCEC's redevelopment of these sites reduces capital investment, increases recreational/greenspaces (at the Quin T Site), and minimizes greenhouse gas contributions from redevelopment activities. The City of Erie's 2016 Comprehensive Plan emphasizes the need to focus future development around existing transportation and public utility corridors, which these projects do. Similarly, a primary goal of the most recent County Land Use Plan is to promote development across the County in areas with existing sewer and water facilities. Owing to the largely rural nature of the County, access to existing infrastructure and public utilities is paramount to equitable development and is consistent with US EPA Smart Growth approaches to reuse already-developed land. Destination Erie, a 2015 northwestern Pennsylvania regional strategic plan, specifically encourages growth and development in areas served by existing infrastructure. Accordingly, both sites are located in urbanized areas with utility connections to support reuse of existing infrastructure.

2.a.i The Community's Need for Funding: Erie County is primarily a collection of small, rural communities with limited opportunities for employment and economic growth, due in part to their small populations, limited financial resources, and the decades-long decline in industrial manufacturing. The census tracts in which the EMI (42049001400) and Quin T (42049001300) Sites are located are significantly distressed. Based on the Measuring Distress Tool available from the US Economic Development Administration, the 2021 Unemployment Rate (5-Year ACS) is 15.1% and 10.1% for the EMI and Quin T Census Tracts, respectively; versus the United States average of 5.5%.

Additionally, the US Census Bureau's American Community Survey estimates that the population in Erie County decreased 4.6% from 2010 to 2022. This has contributed to a sustained and detrimental reduction in the County-wide workforce, which has effectively decreased the County tax base and placed an increasing and unsustainable reliance on social services and public assistance programs (US Bureau of Labor Statistics, July 2022 data).

Comparative measures of income and wages indicate greater inequality and disproportionately higher impacts to disadvantaged communities in Erie County, which limit their capacity to acquire the resources needed to remove community blight and mitigate environmental hazards to improve public health conditions. According to US Bureau of Labor Statistics (BLS) data (May 2020), the mean hourly wages in Erie County (\$21.65) were 25% lower than national average (\$27.07) and 20% less than Pennsylvania (\$25.94) wages. Moreover, US Census Bureau data (2020 Decennial Census) indicated median household income in Erie County (\$51,818) was 22% less than Pennsylvania's average (\$63,463) and nearly 28% less than national (\$65,712) average. According to the American Community Survey, the census tract data in which the priority sites are located have per capita income for the last 5 years of \$13,939 (EMI) and \$11,576 (Quin T); versus the US average of \$37,638. These income disparities contribute to disproportionately elevated rates of poverty in Erie County. U.S. Census Bureau data from 2022 indicate the overall poverty rate in Erie County (24.7%) is greater than that in Pennsylvania (11.8%) and the U.S. (11.5%). Further, childhood (under age 18) poverty rates in Erie County (23.8%) are higher than in the surrounding counties of Warren (20.8%) and Crawford (21.0%) and higher than that of Pennsylvania (16.3%), indicating the issues of food and housing insecurity are endemic in the most vulnerable populations of Erie County (data provided by the US Census 2021). Overall, the economic dislocations experienced across the county and in the distressed/disadvantaged EJ communities surrounding the target sites severely reduces the availability of local resources to be made available for the remedial actions needed at these sites.

2.a.ii (1) Health or Welfare of Sensitive Populations: Mitigating the persistent detrimental environmental conditions related to these targeted brownfield sites would improve the general welfare of sensitive populations in communities in close proximity to the sites and across Erie County. The EPA EJSCREEN Tool identified significantly higher than national average sensitive populations in the communities surrounding EMI and Quin T suffering from Critical Service Gaps above the 90th percentile for broadband access, housing burden, and location within Food Deserts. The Climate and Economic Justice Screening Tool (CEJST) further shows that negative health-related disparities within the identified Census Tracts reach above the 90th percentile in children under 5, low-income residents, and persons with disabilities. Also above the 90th percentile, according to CEJST, are the following disproportionate socioeconomic disparities that compound factors leading to negative health outcomes: historic under investment, housing cost barriers (92nd percentile), lack of green space (90th percentile), and lead

based paint in homes (94th percentile). Based on census tract data, the communities surrounding EMI and Quin T have long identified as disadvantaged. The vacant, blighted, and contaminated sites at the heart of these communities perpetuate socioeconomic decline in the region. These negative metrics have a disproportionate impact on the welfare of human and environmental health in these communities. The redevelopment of EMI will create modern office and working spaces which will directly support investment, foster new well-paying jobs, revitalization, and social equity. The development of recreational fields at Quin T will aid in improving the welfare of sensitive populations in these communities and across Erie County.

2.a.ii (2) Greater Than Normal Incidences of Disease and Adverse Health Conditions: The environmental conditions associated with brownfields sites in Erie County represent persistent sources of contamination that are adversely impacting the health of county residents. As reported in the most recent Erie County Community Health Needs Assessment (2018), elevated lead levels in children throughout Erie (2.1%) were higher than the Pennsylvania average (1.3%). The same report also found that 2016 Erie County lifetime asthma prevalence was greatest in communities with annual household incomes below \$15,000 (EMI & Quin T Census Tract 5-year median household incomes are below \$14,000), at 18%, compared to 14% County-wide across all income levels and 15% statewide. According to the National Institute of Health "...Lead exposure may be increasing asthma risk and contributing to racial disparities¹." Given the sensitive and disadvantaged populations residing in the communities surrounding the target sites, public-health data suggest hazards at these sites are having measurable and negative impacts on the health of those communities. The EPA CEJST identified significant health disparities above the 90th percentile for low-life expectancy (90th), heart disease (93rd), and asthma (99th), as well as documented "disadvantaged" status in the census tracts for the EMI and Quin T locations. The EPA EJSCREEN additionally identified these census tracts with Cancer rates ranging in the 80-100th percentiles.

The impacts are also found in data from the county versus Pennsylvania. The below table summarizes additional public-health measures for those conditions prevalent in disadvantaged communities and those associated with pollutants commonly related to brownfields.

	Death Rate per 1,000 ^{1,2}	Black Infant Mortality Rate ^{1,2}	Cancer Deaths ^{1,2}	Incidences of Lung Cancer ^{1,2}	Incidences of Prostate Cancer ^{1,2}	Diabetes Deaths ^{1,3}
Erie County	799.3	21.1	164.9	19.8	118.0	23.6
Pennsylvania	762.3	13.1	156.7	14.1	104.0	20.7

Pennsylvania Department of Health, available: <https://www.phaim1.health.pa.gov/EDD/>
²age-adjusted per 100,000 individuals for 2017-2019 ³age-adjusted per 100,000 individuals for 2015-2019

The cumulative impacts of both local and county-wide environmental issues present a significant risk of exposure to local residents, the county, and sensitive natural resources, specifically Lake Erie, which is the city's sole source of drinking water. These exposure risks are a direct result of the impacts from historical operations at the targeted sites. EMI was a foundry and electrical components manufacturer with identified chlorinated solvent impacts in soil, soil vapor, and groundwater. Quin T was an asphalt and asbestos shingle manufacturer with PAHs and heavy metals in soil, soil vapor, and groundwater. Nonpoint source pollution in soil and groundwater from decades of airborne deposition, widespread improper closures, releases, and a history of DEP violations all contribute to the ongoing human health risks present at these sites. The legacy of identified environmental contamination, now quantified, is likely leading to a measurable and disproportionate negative impact on the health conditions of local residents. Remediation of these sites will remove and/or retain the identified environmental health conditions negatively impacting the surrounding communities.

2.a.ii (3) (a) Identification of Environmental Justice Issues: The communities surrounding the two contaminated sites experienced disproportionate and adverse environmental, human health, and other cumulative impacts long before these sites shuttered. The historic environmental legacy of these sites, along with the economic impacts of their closures, have exacerbated the environmental justice issues of these communities. With environmental assessments and characterizations of these sites completed via leveraging America Rescue Plan and US EPA Brownfield Community Wide Assessment grant funding, environmental impacts have been quantified. While direct correlation between industrial toxin contamination and the negative health impacts

¹ Environ Health Perspective, "Blood Lead Level and Risk of Asthma", published 2005 March 3 (<https://www.ncbi.nlm.nih.gov/pmc/articles/PMC1257653/>)

documented above cannot always be proven, Environmental Justice Issues can and have been clearly identified in these areas, with CEJST data clearly indicating a location-based connection between contamination and negative health outcomes within the EMI and Quin T communities. CEJST data shows multiple environmental justice disparities above the 90th percentile in these census tracts, including asthma, lack of green space (91st), household lead paint, low income (99th), energy costs (96th), diabetes (95th), heart disease, low life expectancy, housing costs (92nd), low median income (95th), poverty (98th), and unemployment (96th). In accordance with the Justice40 initiative to remove blight, environmental hazards, and negative human health impacts in disadvantaged communities, 100% of this funding would be used to advance Environmental Justice within these neighborhoods, thereby decreasing the extreme disparities elucidated in the above data.

2.a.ii (3)(b) Advancing Environmental Justice: EDCEC purchased the former Quin T and EMI to advance its mission “to develop real estate to support job creation and business development in Erie County...” and to support disadvantaged and overlooked communities impacted by vacated, blighted, toxic sites. To date, EDCEC has invested more than \$4 million in characterization, remediation, demolition, and redevelopment planning to turn these grossly contaminated sites into safe, usable spaces. Leveraging EPA Brownfields Assessment grant funding with \$3.5 million City and County funding provided for engineering design, legal fees, removal of hazardous waste, and demolition of existing, dilapidated structures, EDCEC has already begun fulfilling City and County redevelopment plans, as well as its own mission, to prioritize blight elimination and job creation along main corridors and within disadvantaged neighborhoods. Both EMI and Quin T are centrally located within CEJST recognized disadvantaged communities. Redevelopment of these sites will advance EJ issues by removing identified environmental contamination, stopping the spread of identified groundwater and soil vapor contamination into the surrounding communities, and providing well-paying jobs and open recreational space. For many communities, the final barrier to correcting years of disproportionate impacts to disadvantaged communities is environmental cleanup, and for most, that requires an EPA grant to make significant advancement. EDCEC will combat potential displacement of existing community members due to potential property increases resultant of planned redevelopment of the high priority sites via ongoing community engagement and working with the City on zoning modifications to maintain the inclusion of low-income housing in the communities targeted for assessment and redevelopment.

2.b.i. and ii. Only by engaging the civic groups, residents, and local organizations representing communities adversely affected by brownfields can a revitalization program be successful and impactful. Below are some of the community partners EDCEC has been working with to support the cleanup and redevelopment of EMI and Quin T sites. Throughout the duration of the program, EDCEC will continue to actively engage additional partners to broaden their community connections and outreach. The stakeholders and community groups listed below are true “grass-roots” local community organizations and have been vital in moving the mission of brownfields redevelopment forward for over 10 years.

Organization Name	Point of Contact	Specific involvement in the project or assistance provided
SONS of Lake Erie	Jerry Skrypzak sonslakerie@aol.com 814-453-2270	Engage membership to identify priority sites along Lake Erie and distribute assessment program announcements
Booker T. Washington Center	Shauntelle Hilliard shilliard@btwcenter.org 814-453-5744	Provide space for public meetings and will coordinate outreach to their members
Union City Pride	David Nothum nothumd627@msn.com 814-746-6668	Engage membership to participate in the program, assist in identifying local priority sites, distribute program information, and solicit site-reuse input
Infinite Erie	Kim Thomas 814-480-0337 kthomas@infiniteerie.com	Economic Development, Environmental Justice Community Engagement, Infrastructure Growth, & Job Training

2.b.iii. Incorporating Community Input: Soliciting, incorporating, and responding to community input is necessary to ensure program success, transparency, and progress toward achieving equitable economic, social, and EJ outcomes. EDCEC has an established community engagement approach as part of their mission to develop real estate to support job creation and business development in Erie County. EDCEC encourages community engagement to facilitate reciprocal, collaborative, and constructive dialogue with the community using targeted, multimodal outreach followed by review and response feedback. To kick off the program, EDCEC will announce

the award to the community through a press release to the local newspapers (*Erie Times News*), local trade and commerce publications (e.g., Erie Regional Chamber & Growth Partnership, Manufacturer & Business Association), local TV stations (e.g., WICU and WJET), and the Erie County Economic Development’s social media pages (Twitter and LinkedIn). Additionally, EDCEC will post announcements on their website (www.ecrda.net) and send program updates as part of their monthly newsletter to their email listserv of over 5,000 recipients. To encourage robust public participation and provide an alternative to in-person community engagement, EDCEC routinely livestreams public meetings and communicates through electronic media. As part of their current redevelopment activities of EMI and Quin T, EDCEC organized press conferences at these sites to announce redevelopment plans for each site, which were attended by local television and print media as well as officials from local, county, and state governments and organizations. As cleanup milestones are achieved, additional press conferences will be organized to actively engage the community through multiple, high-profile media outlets. Community input will be tracked via sign-in sheets and collection of comments as well as from community stakeholders, listed above. Applicable comments will be addressed via follow up meetings and responses on the EDCEC website and social media outlets.

3.a. Proposed Cleanup Plan: The remedial strategy was developed utilizing the ECIDA’s 2019&2022 US EPA Brownfields Assessment grant. Phase I ESAs and Phase II activities were completed and ultimately led to the development of the Remedial Action Plans for both sites using assessment grant funding. The sites have been entered into the PADEP Voluntary Cleanup Program as of October 2023. Draft Analyses of Brownfields Cleanup Alternatives (ABCA) were developed by a qualified environmental professional and submitted for public review and comment. The proposed cleanup plans were developed via consultation with qualified environmental professionals and qualified environmental construction contractors. A summary of the proposed cleanup plans for each site is provided below.

EMI - The proposed cleanup plan includes source soil excavation with offsite disposal, backfilling with certified clean fill, and targeted groundwater in-situ remediation with monitored natural attenuation via top of bedrock groundwater monitoring well installation. This is an effective way to eliminate risk at the site, since contamination will be removed, and the exposure pathways will no longer exist. Groundwater impacts should decrease from a combination of targeted in-situ remediation with natural attenuation as the source material is removed.

Quin T - The proposed cleanup plan includes targeted soil excavation with offsite disposal, backfilling with certified clean fill and installation of groundwater monitoring wells for monitored natural attenuation. This is an effective way to eliminate risk at the site, since contamination will be removed, and the exposure pathways will no longer exist. Groundwater impacts should decrease from natural attenuation as the source material is removed.

3.b Description of Tasks/Activities and Outputs

Task 1: Programmatic
i. <u>Project Implementation:</u>
<ul style="list-style-type: none"> ▪ Overall programmatic and administrative oversight and cooperative agreement compliance ▪ Solicitation, selection, and contracting of qualified environmental professional (QEP) using the EPA’s acceptable procedures. ▪ Annual and quarterly performance reporting (US ACRES), and ASAP accounting management ▪ Travel for applicant attendance at conferences to present program success stories ▪ Development and submission of the Quality Management Plan (QMP)
ii. <u>Anticipated Project Schedule:</u> The solicitation for and selection of the QEP will be completed within 2 months following execution of the cooperative agreement (CA). The QMP will be developed and submitted within 90-days of the beginning of the grant performance period. All other administrative tasks will be completed as required in the CA over the four-year grant performance period.
iii. <u>Task/Activity Lead:</u> EDCEC (Applicant)
iv. <u>Outputs:</u> CA execution, QEP solicitation and contracting, EPA approved QMP, 16 quarterly update reports (US ACRES), accounting updates (ASAP), annual FFR and MBE/WBE reporting, 1 kickoff meeting with US EPA, and travel to up to 5 conferences, and grant closeout reporting.
Task 2: Community Outreach
i. <u>Project Implementation:</u>
<ul style="list-style-type: none"> ▪ Public announcements of grant progress, updates, and public meetings ▪ Project updates through EDCEC social media accounts and email newsletters ▪ Secondary information distribution via EDCEC community engagement partners ▪ Host a kick-off meeting in the EDCEC office building to inform the community. ▪ Outreach to community engagement partners, local governments, and private stakeholders

ii. <u>Anticipated Project Schedule:</u> Initial public meeting will be scheduled during the first quarter following grant award to inform the community. Over the four years of the program, updates, announcements, and milestones will be posted regularly via EDCEC social media accounts and websites and public update meetings will be held quarterly to highlight project milestones.
iii. <u>Task/Activity Lead:</u> EDCEC (Applicant)
iv. <u>Outputs:</u> Host up to 4 public meetings, social media and website updates, creation of marketing materials, press releases, and regular outreach to community engagement partners.
Task 3: Site Specific Reporting
i. <u>Project Implementation:</u> <ul style="list-style-type: none"> ▪ Through the selected QEP, prepare and submit a quality assurance program plan (QAPrP) for the collection of environmental data as part of the remedial site closure activities. ▪ Through the selected QEP, develop final ABCA's, health and safety plan and bidding documents for hazardous soils removal (EMI & Quin T) and disposal consistent with the Pennsylvania Land Recycling Program
ii. <u>Anticipated Project Schedule:</u> The QEP will be tasked with completing the QAPrP within the first month after selection. The final ABCA's, HASP, and bidding documents will be prepared in the first six months after the QEP is selected.
iii. <u>Task/Activity Lead:</u> The selected Qualified Environmental Professional, under the direction of the EDCEC
iv. <u>Outputs:</u> 1 EPA Approved QAPrP, 2 HASP, and two sets (EMI & Quin T) of bid documents for advertisement and procurement of a qualified remediation contractor.
Task 4: Site Cleanup
i. <u>Project Implementation:</u> <ul style="list-style-type: none"> ▪ The selected QEP, under direct supervision of the EDCEC, will coordinate the following remedial activities: all appropriate permits and erosion and sedimentation control; removal and disposal of soils at permitted landfill, post excavation soil sampling, installation of groundwater monitoring wells (EMI & Quin T), oversight of groundwater injection remediation (EMI), groundwater sampling for eight quarters (EMI and Quin T), PADEP VCP coordination, backfilling clean fill, and PADEP VCP reporting.
ii. <u>Anticipated Project Schedule:</u> The remedial activities are anticipated to initiate within 8-months of award and be completed in 3-years, to include 2-years of groundwater monitoring quarterly sampling.
iii. <u>Task/Activity Lead:</u> The selected Qualified Environmental Professional, under direction of the EDCEC
iv. <u>Outputs:</u> Completion of remediation of EMI & Quin T with PADEP VCP closure and approval. Site prepared for office space and public open space (EMI) and recreational fields for local Charter School and public use (Quin T).

3.c. Costs Estimates

Task 1: Programmatic Costs

Personnel – 400 hours at an average rate of \$55/hour = \$22,000; *Travel* - \$800 for EDCEC attendance at five state and one EPA conferences (lodging, conference fees, travel, and food) = \$4,000; *Supplies* - \$2,400 for printing and distribution, website maintenance fees. *Contractual* – The QEP will assist the CAR in development and submission of the QMP = \$2,500.

Task 2: Community Outreach Costs

Personnel - 200 hours at an average rate of \$55/hour = \$11,000; *Supplies* - \$2,000 for newspaper fees, website/social media fees, printing information materials; *Contractual* – 10 days for the QEP to attend and support outreach meetings at an average rate of \$1,750/day = \$17,500.

Task 3: Site Specific Reporting

Personnel - 380 hours at an average rate of \$55/hour = \$26,400; *Contractual* - a QAPrP at a cost of \$5,000, two Final ABCA's at a cost of \$8,000 each, two HASP's at a cost of \$2,000 each, two sets Bidding Documents at a cost of \$10,000 each, and remedial contractor coordination at \$25,000 each.

Task 4: Site Cleanup

Personnel - 240 hours at an average rate of \$55/hour = \$13,200; *Contractual* – **EMI** – costs based on environmental professional costs estimates – approximately 5,950 tons of contaminated soils removal and disposal @\$225 a ton \$1,338,750; backfilling 5,950 tons @ \$50 a ton \$297,500; 183 post excavation samples including waste classification for disposal @ \$265 per sample \$48,495; groundwater remediation via 40 in-situ injections \$279,828; installation of 5 top of bedrock groundwater monitoring wells and sampling for 2-years \$282,305; vapor intrusion abatement @\$83,919 and subcontractor labor costs @ \$427,590 and QEP coordination, implementation, onsite soil and groundwater sampling, oversight and PADEP Act 2 Reporting @ - \$479,818 –

EMI Total of \$3,238,205. **Quin T** – costs based on environmental professional costs estimates – approximately 1,800 tons of contaminated soils removal and disposal @\$225 a ton \$405,000, backfilling 1,800 tons @ \$50 a ton \$90,000, 63 post excavation samples plus waste characterization @ \$569 per sample \$35,900, installation of five top of bedrock groundwater monitoring wells and sampling for 2-years \$282,305, vapor intrusion abatement and risk evaluation @\$247,589 and subcontractor labor costs for above - \$84,953; and QEP coordination, implementation, onsite soil, groundwater sampling, vapor remediation, contractor oversight and PADEP Act 2 Reporting - \$426,648; Quin T Total \$1,572,395.

Budget Categories		Project Task (\$)							Total
		Programmatic	Community Outreach		Site Specific Reporting		Site Cleanup		
			Quin T	EMI	Quin T	EMI	Quin T	EMI	
Direct Costs	Personnel	\$22,000	\$5,500	\$5,500	\$13,200	\$13,200	\$6,600	\$6,600	\$72,600
	Fringe Benefits	\$0		\$0		\$0		\$0	\$0
	Travel	\$4,000		\$0		\$0		\$0	\$4,000
	Equipment	\$0		\$0		\$0		\$0	\$0
	Supplies	\$2,400	\$1,000	\$1,000		\$0		\$0	\$4,400
	Contractual	\$2,500	\$8,750	\$8,750	\$47,500	\$47,500	\$426,648	\$479,818	\$1,021,466
	Construction	\$0	\$0	\$0	\$0	\$0	\$1,145,747	\$2,751,787	\$3,897,534
	Other	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$30,900	\$15,250	\$15,250	\$60,700	\$60,700	\$1,578,995	\$3,238,205	\$5,000,000
Indirect Costs		\$0		\$0		\$0		\$0	\$0
Total Federal Funding		\$30,900	\$15,250	\$15,250	\$60,700	\$60,700	\$1,578,995	\$3,238,205	\$5,000,000
Total Budget		\$30,900	\$15,250	\$15,250	\$60,700	\$60,700	\$1,578,995	\$3,238,205	\$5,000,000

3.d. Plan to Measure and Evaluate Environmental Progress and Results: EDCEC will track, measure, and evaluate the progress of site remediation through monthly reporting from the selected qualified environmental professional. The EDCEC will utilize their current internal management practices for the procurement, selection, and management of a qualified environmental professional, consistent with all applicable state and federal regulations. Additionally, the solicitation for the QEP will require the submission of a project timeline based on the expected outputs identified in Section 3.b to ensure the program schedule is being met and deliverables are being completed in a timely and efficient manner. EDCEC will also submit quarterly progress reports, annual MBE/WBE and FFR documentation, and update ACRES as deliverables are completed and progress is made on programmatic goals. The measurable outcomes will include the following for both EMI and Quin T: volume of impacted soils removed; mass of contaminants removed in soil; reduction of contaminants of concern in groundwater, jobs created and completion of all PADEP reporting for the closure of the sites through the Pennsylvania Voluntary Cleanup Program.

4.a.i. and ii. Organizational Structure & Description of Key Staff: EDCEC possesses the organizational structure necessary to ensure timely and successful expenditure of funds to complete all technical, administrative, and financial requirements of the grant. EDCEC was a coalition partner with the ECIDA on a 2019 US EPA Brownfields Coalition Community Wide Assessment grant and share specialized brownfields staff, while remaining separate legal entities. EDCEC is led by Executive Director, Ms. Mengine, who has over 30 years of community and economic development experience and will oversee the overall administration and management of the assessment grant. Under the guidance of Ms. Mengine, EDCEC has successfully managed and implemented a county-wide brownfields redevelopment program. Ms. Mengine has been responsible for completing assessment activities at more than 10 brownfields sites and has leveraged over \$17 million dollars in additional public funding for assessment, remediation, and redevelopment activities at those sites. EDCEC also has a dedicated CFO, Ms. Linda Robbins, with over 30 years of financial and accounting experience and manages the financial compliance for numerous grant programs. Ms. Robbins also has extensive experience with the ASAP financial accounting program and is familiar with US EPA grant-specific financial compliance requirements. EDCEC will dedicate one staff member, Ms. Ti Sumner, from their brownfields and real estate development team to oversee the day-to-day management of this program and direct the selected QEP throughout the grant

performance period. Ms. Sumner currently serves in a similar role for the ECIDA's US EPA Assessment Grant and has experience simultaneously managing numerous state and federal grant programs for the EDCEC and ECIDA.

Ms. Mengine, Ms. Sumner and Ms. Robbins currently serve in a similar role for the ECIDA's US EPA Assessment Grant and have experience simultaneously managing numerous state and federal grant programs for the EDCEC and ECIDA. Upon authorization of the Cooperative Agreement by the US EPA, EDCEC will issue a request for proposal to select an experienced, qualified environmental professional (QEP). The QEP will coordinate directly with Ms. Sumner on day-to-day activities. Ms. Sumner will coordinate with Ms. Mengine on overall grant program performance and Ms. Robbins on accounting requirements. Ms. Sumner will also coordinate with the QEP throughout the grant performance period to secure additional funding resources to extend the impact and reach of the cleanup grant program. EDCEC was a coalition partner with the ECIDA on a 2019 US EPA Brownfields Coalition Community Wide Assessment grant and share specialized brownfields staff. Their previous US EPA Brownfields Assessment Grant experience and community connections provide the capacity to carry out the programmatic, administrative, and financial requirements to successfully manage and implement the grant program. Further, EDCEC has an experienced, solutions-oriented capital finance and lending team to help bridge the transition from environmental assessment to successful economic and industrial redevelopment. The organizational structure of the EDCEC, along with its dedication to brownfields projects throughout the county, provides it with the capacity and capability to manage and administer all aspects of this grant program and acquire the resources necessary to support all aspects of brownfields revitalization.

4.a.iii Acquiring Additional Resources: EDCEC has a demonstrated record of acquiring the additional resources necessary to lead a successful brownfields assessment program. Together, Ms. Mengine and Ms. Sumner were responsible for soliciting and retaining a QEP to complete technical environmental tasks and reporting required by the grant program. EDCEC has internal processes for the hiring of qualified contractors which adhere to the EPA's Solicitation Clauses. EDCEC does not anticipate any subrecipients as part of this grant program. EDCEC procurement guidelines require that all contractors must make good faith attempts to hire a minimum 10% from local minorities.

4.b.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements : The EDCEC has not received a US EPA Brownfields Grant. The EDCEC has been awarded numerous federal and state assistance agreements to facilitate economic development, job creations, and remove environmental hazards in the County that are similar in scope and purpose to the proposed brownfields cleanup grant program.

4.b.ii. (1) Purpose and Accomplishments:

U.S. American Rescue Plan (ARP) – the EDCEC has leveraged over \$6.5 million in ARP grant funding from the City and County of Erie for the redevelopment of brownfields sites including: removal and disposal of hazardous materials, engineering and design, architectural design, demolition, construction and stormwater management planning and design.

Pennsylvania Office of the Budget, Redevelopment Assistance Capital Program (RACP) – The EDCEC has leveraged over \$9 million from this grant program. The funding was used for commercial and industrial redevelopment, creating and/or retaining hundreds of full-time, well-paying jobs.

U.S. Department of Housing & Urban Development (HUD) – The EDCEC leveraged \$3.5 million in HUD grant funding for urban community redevelopment.

(2) Compliance with Grant Requirements

The EDCEC has complied with all requirements of the above-mentioned assistance agreements, including: reporting, procurement, funds disbursements, financial tracking, submission of technical documents, documentation of project progress, and auditing. The EDCEC complied with all grant specific requirements including: timely development of workplans, schedules, terms and conditions, reporting of quarterly reports, and financial status reports. The EDCEC has the procedural knowledge to successfully utilize, track and effectively report on Cleanup Grant funding.

FY 2024 UNITED STATES ENVIRONMENTAL PROTECTION AGENCY (EPA)
BROWNFIELDS CLEANUP GRANT APPLICATION

Attachment 1 – Applicant Eligibility

1. Applicant Eligibility

The Enterprise Development Center of Erie County (the Applicant) is recognized as an exempt organization under provisions of the Internal Revenue Code and is organized and operated exclusively for charitable and educational purposes within the meaning of Section 501(c)(3) of the Internal Revenue Code of 1986 and meets applicant eligibility requirements for this solicitation (EPA-OLEM-OBLR-21-04). Documentation of the Applicant's eligibility is attached.

2. Information on Previously Awarded Cleanup Grants

The Enterprise Development Center of Erie County affirms it has not previously been awarded a US EPA Brownfields Cleanup grant.

3. Affirmative Statement on Multipurpose Grants

The Enterprise Development Center of Erie County affirms it does not have an open US EPA Brownfields Multipurpose grant nor has it ever previously been awarded as US EPA Brownfields Multipurpose grant.

4. Site Ownership

The Enterprise Development Center of Erie County took ownership of the sites identified in this US EPA Brownfields Cleanup grant on the following dates:

EMI – September 13, 2023

Quint T – September 13, 2023

The Enterprise Development Center of Erie County affirms it will maintain ownership for the duration of time in which the Brownfields Cleanup Grant funds are disbursed for the cleanup of the sites.

Deeds naming the Enterprise Development Center of Erie County as owners of the sites are attached on the following pages.

5. Basic Site Information

- a) Erie Modern Industries (EMI)
603-643 West 12th Street
Erie, PA 16503-1343

- b) Quin T
140 East 16th Street
Erie, PA 16503-1861

6. Status and History of Contamination at the Sites

Erie Modern Industries (EMI)

- a) The EMI site is contaminated by hazardous substances.
- b) The subject site is a former iron foundry and manufacturing facility which also operated as an electronics parts facility until the early 2000s. Active operations ceased in 2001. The site was purchased by the Enterprise Development Center of Erie County on September 13, 2023. The subject site is located along the south side of West 12th Street between Cherry and Poplar Streets in Erie, Pennsylvania. The only remaining structures are the office building along Cherry Street and the adjacent and connected former foundry building. The remainder of the site consists of cleared areas and former building slabs. The site is currently vacant
- c) Environmental concerns at the site include the following; Soil results identified the following constituents of concern at concentrations above the PADEP Non-Use Aquifer Non-Residential Soil-to-Groundwater MSCs: tetrachloroethene (PCE), trichloroethene (TCE), and polychlorinated biphenyls (PCBs). Groundwater results identified PCE concentrations exceeding the PADEP Non-Use Aquifer Groundwater MSC.
- d) The site become contaminated from the previous industrial operations, including a foundry and electronic parts manufacturer. A Phase II ESA, (Draft) utilizing US EPA Brownfields Assessment grant funding was completed in October 2023. All Phase II ESA work was completed in accordance with a U.S. EPA approved Field Sampling Plan. Soil and groundwater samples were analyzed for Target Compound List (TCL) volatile organic compounds, TCL semi-volatile organic compounds, polychlorinated biphenyls (PCBs), and Resource Conservation and Recovery Act (RCRA) 8 metals.

The Phase II ESA was issued as draft in October 2023. The draft Phase II ESA soil results identified the following constituents of concern at concentrations above the PADEP Non-Use Aquifer Non-Residential Soil-to-Groundwater MSCs: tetrachloroethene (PCE), trichloroethene (TCE), and total polychlorinated biphenyls (PCBs). PCE concentrations were identified in soil at above the non-residential direct contact MSCs. Benzene, PCE, toluene, TCE, and vinyl chloride were detected at concentrations exceeding the soil vapor intrusion screening levels. Groundwater results identified PCE concentrations exceeding the PADEP Non-Use Aquifer Groundwater MSC.

Quin T

- a) The site is contaminated with hazardous substances and petroleum products. The site received a Petroleum Site Eligibility Determination from the Pennsylvania Department of Environmental Protection as part of the submission and EPA approval of a Property Approval Questionnaire – Petroleum Products, prior to the initiation of assessment activities funded by an US EPA Brownfields Assessment grant in 2019. The US ACRES Property Identification number is 249324.

- b) The subject site is a currently vacant, former paper and roofing products manufacturing facility that used asbestos in finished products. Manufacturing operations were active from approximately the mid-1880s until 2005/6. Historically, the subject site contained a manufactured gas plant, numerous boilers, rail spurs, large ($\geq 10,000$ gallon) aboveground storage tanks (ASTs), two 30,000 gallon fuel oil underground storage tanks (USTs), more than 15 interconnected buildings, shipping/receiving facilities, and a bank of electrical transformers. An extensive fire destroyed much of the former structures and buildings on the subject site in 2015 and a majority of those buildings were razed in 2016. In 2022, the final standing building, 4-story former manufacturing building, and 100-ft smoke stack were demolished. The site is currently vacant.
- c) Environmental concerns identified at the site include: concentrations of semi-volatile organic compounds (SVOCs) and metals in site soils and SVOCs in groundwater.
- d) A Phase II Environmental Site Assessment (Draft) was completed on the site in October 2023. The Phase II ESA was completed utilizing U.S. EPA Brownfields Community Wide Assessment grant funding. All Phase II ESA work was completed in accordance with a U.S. EPA approved Field Sampling Plan, dated July 2023. A summary of the findings of the 2023 Draft Phase II ESA are presented below.

Soil impacts include concentrations of the following constituents of concerns which exceed the PADEP Residential Direct Contact for Soils; 1,1-Biphenyl, 2-Methylnaphthalene, Benzo(A)Anthracene, Benzo(A)Pyrene, Benzo(B)Fluoranthene, Chrysene, Dibenzo(A,H)Anthracene, Indeno(1,2,3-CD)Pyrene, Naphthalene, lead, chromium, and arsenic. 2-Methylnaphthalene was also found at concentrations in soils which exceed the PADEP Residential Non-Use Aquifer Soil-to-Groundwater MSC. Groundwater impacts were also identified including concentrations of chrysene above the PADEP Residential Non-Use Aquifer MSC. Additionally, the following constituents of concern were identified in soils that exceed the Residential Soil Vapor Screening Criteria; 1,1-Biphenyl, 2-Methylnaphthalene, Benzene, Ethylbenzene, Naphthalene, and Toluene.

7. Brownfield Site Definition

- 1) Erie Modern Industries (EMI) site is eligible for Brownfields Grant funding as it meets the definition of a brownfield. The EMI site is “a property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant.” The site received EPA approval through the submission and approval of a Property Approval Questionnaire – Hazardous Substances, prior to the initiation of assessment activities funded by an US EPA Brownfields Assessment grant in 2019. The US ACRES Property Identification number is 250016.
 - a. EDCEC affirms that the EMI site is not listed or proposed for listing in the National Priorities List.
 - b. The EDCEC affirms the EMI site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
 - c. The EDCEC affirms that the EMI site is not subject to jurisdiction, custody, or control of the U.S. Government.

- 2) Quin T site is eligible for Brownfields Grant funding as it meets the definition of a brownfield. The EMI site is “a property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant or contaminant.” The site received a Petroleum Site Eligibility Determination from the Pennsylvania Department of Environmental Protection as part of the submission and EPA approval of a Property Approval Questionnaire – Petroleum Products, prior to the initiation of assessment activities funded by an US EPA Brownfields Assessment grant in 2019. The US ACRES Property Identification number is 249324.
 - a. EDCEC affirms that the Quin T site is not listed or proposed for listing in the National Priorities List.
 - b. The EDCEC affirms the Quin T site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
 - c. The EDCEC affirms that the Quin T site is not subject to jurisdiction, custody, or control of the U.S. Government.

8. Environmental Assessment Required for Cleanup Grant Applications

a) Erie Modern Industries (EMI) Site

A written Phase II Environmental Site Assessment Report (Draft) was completed for this site in October 2023. The Phase II ESA, utilizing US EPA Brownfields Assessment grant funding, included soil and groundwater sampling was completed in 2023. All Phase II ESA work was completed in accordance with an U.S. EPA approved Field Sampling Plan. Soil and groundwater samples were analyzed for Target Compound List (TCL) volatile organic compounds, TCL semi-volatile organic compounds, polychlorinated biphenyls (PCBs), and Resource Conservation and Recovery Act (RCRA) 8 metals.

The Phase II ESA was issued as draft in October 2023. The draft Phase II ESA soil results identified the following constituents of concern at concentrations above the PADEP Non-Use Aquifer Non-Residential Soil-to-Groundwater MSCs: tetrachloroethene (PCE), trichloroethene (TCE), and total polychlorinated biphenyls (PCBs). PCE concentrations were identified in soil at above the non-residential direct contact MSCs. Benzene, PCE, toluene, TCE, and vinyl chloride were detected at concentrations exceeding the soil vapor intrusion screening levels. Groundwater results identified PCE concentrations exceeding the PADEP Non-Use Aquifer Groundwater MSC.

b)Quin T Site

A Phase II Environmental Site Assessment (Draft) was completed on the site in October 2023. The Phase II ESA was completed utilizing U.S. EPA Brownfields Assessment grant funding. All Phase II ESA work was completed in accordance with a U.S. EPA approved Field Sampling Plan. A summary of the findings of the 2023 Draft Phase II ESA are presented below.

Soil impacts include concentrations of the following constituents of concerns which exceed the PADEP Residential Direct Contact for Soils; 1,1-Biphenyl, 2-Methylnaphthalene, Benzo(A)Anthracene, Benzo(A)Pyrene, Benzo(B)Fluoranthene, Chrysene, Dibenzo(A,H)Anthracene, Indeno(1,2,3-CD)Pyrene, Naphthalene, lead, chromium, and arsenic. 2-Methylnaphthalene was also found at concentrations in soils which exceed the PADEP Residential Non-Use Aquifer Soil-to-Groundwater MSC. Groundwater impacts were also identified including concentrations of chrysene above the PADEP Residential Non-Use Aquifer MSC. Additionally, the following constituents of concern were identified in soils that exceed the Residential Soil Vapor Screening Criteria; 1,1-Biphenyl, 2-Methylnaphthalene, Benzene, Ethylbenzene, Naphthalene, and Toluene.

9. Site Characterization

b. Letter from the Pennsylvania Department of Environmental Protection is provided on the following pages, which affirms:

ii. The sites are enrolled in the State voluntary response program.

iii. Limited additional assessment is need to sufficiently characterizes the sites for the remediation work to begin. EDCEC affirms that there will be a sufficient level of site characterization from the planned site assessments to be performed by June 15, 2024, for the remediation work to begin on the sites.

10. Enforcement of Other Actions

The Enterprise Development Center of Erie County affirms there are no known ongoing or anticipated environmental enforcement actions related to the sites for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The sites for which EPA Cleanup Grant funding is being sought, EMI and Quin T, do not require a “Property-Specific Determination”. Furthermore, both sites have EPA approved Property Approval Questionnaires from a previous US EPA Brownfields Assessment grants and have been updated in ACRES. The Property Identification number from ACRES for EMI is 250016 and the Property Identification Number for Quin T is 249324.

The EDCEC affirms the following is true for both sites:

- The sites are not subject to planned or ongoing removal actions under CERCLA;
- The properties have not been issued or entered into a unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under the Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA);
- The Properties are not subject to RCRA corrective action (§ 300(u) or § 3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures;
- The properties are not land disposal units that have submitted a RCRA closure notification or that are subject to closure requirements specified in a closure plan or permit;
- The properties are not where there has been a release of polychlorinated biphenyls (PCBS) and all, or part of the properties are subject to TSCA remediation; and
- The properties are not facilities receiving monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund.

12. Threshold Criteria Related to CERCLA / Petroleum Liability

Erie Modern Industries (EMI)

a. Property Ownership Eligibility – Hazardous Substances

iii. Landowner Protection from CERCLA Liability

(1) The EDCEC qualifies for Bona Fide Prospective Purchaser Protection based on the details provided below.

(a) Information on the Property Acquisition

(i) The EDCEC acquired ownership of the EMI site via purchase from the Erie Land Bank.

(ii) September 13, 2023.

(iii) Fee Simple Ownership.

(iv) Erie Land Bank

(v) NA

(b) Pre-Purchase Inquiry

(i) An ASTM E1527-21 Phase I Environmental Site Assessment was completed for the Erie County Industrial Development Authority (ECIDA) utilizing a US EPA Brownfields Assessment Grant BF 95301401 after submission of an EPA approved Property Approval Questionnaire. The Phase I ESA was issued as Final on August 17, 2023 with the required All Appropriate Inquiry checklist. The ECIDA is a partner organization to the EDCEC, albeit separate legal entity, both who share the mission of economic redevelopment in Erie County and share resources and personnel.

(ii) The Phase I ESA was completed by a federally procured qualified environmental professional, AMO Environmental Decisions and signed by a principal of the Firm, Gregory M. Firely, BCES. Mr. Firely has over 20-years' experience as an Environmental Scientist and completing ASTM compliant Phase I ESA's.

(iii) The ASTM E1527-21 compliant Phase I ESA was completed and issued Final 27-days prior to the transfer of ownership of the site.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before the EDCEC acquired the property. The EDCEC did not cause or contribute to any release of hazardous substances at the site. The EDCEC affirms that they have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substance to the site.

(d) Post-Acquisition Uses

Since the EDCEC has taken ownership of the site on September 13, 2023, there has been no activity or "uses" of the site. The site is vacant.

(e) Continuing Obligations

(i) Prior to taking ownership to the site all hazardous substances, drums, aboveground storage tanks, etc., were removed and all on site buildings were cleaned out. The hazardous substances were removed by the Erie County Industrial Development Authority which leveraged Erie County and City American Rescue Plan grant funding. The EDCEC has stopped any continuing releases by restricting site access from trespassers via security fencing.

(ii) To prevent any threatened future releases the EDCEC has restricted site access from trespassers via security fencing.

(iii) To prevent or limit exposure to any previously released hazardous substances the EDCEC has restricted site access from trespassers via security fencing.

The EDCEC confirms our commitment to:

- (i) Comply with any land use restrictions and not impeded the effectiveness or integrity of any institutional controls;

- (ii) Assist and cooperate with those performing the cleanup and provide access to the property;
- (iii) Comply with all information requests and administrative subpoenas that have or may be issued in connection to the property; and
- (iv) Provide all legally required notices.

Quin T

- b. Property Ownership Eligibility – Co-mingled with hazardous substances and petroleum contaminant, however after completion of the Phase II ESA (Draft) it has been determined that the predominant contaminant is hazardous substances.

iii. Landowner Protection from CERCLA Liability

- (2) The EDCEC qualifies for Bona Fide Prospective Purchaser Protection based on the details provided below.

(a) Information on the Property Acquisition

- (i) The EDCEC acquired ownership of the EMI site via purchase from the Erie Land Bank.
- (ii) September 13, 2023.
- (iii) Fee Simple Ownership.
- (iv) Erie Land Bank
- (v) NA

(b) Pre-Purchase Inquiry

(i) An ASTM E1527-21 Phase I Environmental Site Assessment was completed for the Erie County Industrial Development Authority (ECIDA) utilizing a US EPA Brownfields Assessment Grant BF 95301401 after submission of an EPA approved Property Approval Questionnaire. The Phase I ESA was issued as Final on August 17, 2023 with the required All Appropriate Inquiry checklist. The ECIDA is a partner organization to the EDCEC, albeit separate legal entity, both who share the mission of economic redevelopment in Erie County and share resources and personnel.

(ii) The Phase I ESA was completed by a federally procured qualified environmental professional, AMO Environmental Decisions and signed by a principal of the Firm, Gregory M. Firely, BCES. Mr. Firely has over 20-years' experience as an Environmental Scientist and completing ASTM compliant Phase I ESA's.

(iii) The ASTM E1527-21 compliant Phase I ESA was completed and issued Final 27-days prior to the transfer of ownership of the site.

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All disposal of hazardous substances at the site occurred before the EDCEC acquired the property. The EDCEC did not cause or contribute to any release of hazardous substances at the site. The EDCEC affirms that they have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substance to the site.

(d) Post-Acquisition Uses

Since the EDCEC has taken ownership of the site on September 13, 2023, there has been no activity or “uses” of the site. The site is vacant.

(e) Continuing Obligations

(i) Prior to taking ownership to the site all hazardous substances, drums, transformers, asbestos, etc., were removed and all on site buildings were cleaned out. The hazardous substances were removed by the Erie County Industrial Development Authority which leveraged Erie County and City American Rescue Plan grant funding. The EDCEC has stopped any continuing releases by restricting site access from trespassers via security fencing.

(ii) To prevent any threatened future releases the EDCEC has restricted site access from trespassers via security fencing.

(iii) To prevent or limit exposure to any previously released hazardous substances the EDCEC has restricted site access from trespassers via security fencing.

The EDCEC confirms our commitment to:

- (v) Comply with any land use restrictions and not impeded the effectiveness or integrity of any institutional controls;
- (vi) Assist and cooperate with those performing the cleanup and provide access to the property;
- (vii) Comply with all information requests and administrative subpoenas that have or may be issued in connection to the property; and
- (viii) Provide all legally required notices.

13. Cleanup Authority and Oversight Structure

- a. The Cleanup of both sites, EMI and Quin T, will be overseen by the Pennsylvania Department of Environmental Protection pursuant PA Code Chapter 250 issued under section 104(a) and 303(a) of the Land Recycling and Environmental Remediation Standards Act, commonly referred to as Act 2.

Both sites, EMI and Quin T, have been entered into the Pennsylvania Department of Environmental Protection voluntary cleanup program. Copies of the Receipts of Notification of entry into the PADEP Voluntary Cleanup Program from the PADEP are attached.

- b. Offsite confirmation sampling is not anticipated for either site. In the event this is deemed necessary we will establish scopes of work and obtain site access agreements with off-site property owners. Additionally, the EDCEC and our federally procured sub-contractors will provide the off-site property owners with certificates of insurance.

14. Community Notification

a. Draft Analysis of Brownfields Cleanup Alternatives

Draft Analysis of Brownfields Cleanup Alternatives (ABCAs) were completed for each site, EMI and Quin T, and are attached.

b. Community Notification Ad

A legal notice notifying the public of the availability of the Draft ABCAs for the EMI and Quin T sites as well as the draft cleanup grant application was published on October 19, 2023 in the Erie Times-News. The legal notice clearly stated:

- That a copy of the draft grant application, including the draft ABCAs are available for public review and comment at the EDCEC offices and available on the website;
- Instruction on how to comment on the draft application and draft ABCAs;
- The location of the draft application;
- The date, time, and location of the public meeting.

A copy of the proof of the legal notice is attached.

c. Public Meeting

A public meeting was held on October 26, 2023 at 11:00 am at the law offices of MacDonald, Illig, Jones & Britton (for potential space issues) at 100 State Street, Suite 700, Erie PA. From the public meeting:

- No public comments were received;
- No response to comments were warranted as no public comments were received;
- The meeting minutes are attached;
- The meeting sign-in sheet is attached.

ci. Submission of Community Notification Documents

The following community notification documents are attached:

- Copies of the Draft ABCAs;
- Copy of the newspaper proof of the legal notice notifying the public of the availability to review and comment and public meeting to discuss the draft ABCAs and draft grant application. The legal notice was posted 23-days before the submission of this application.
- No public comments were received;
- No responses to public comment were generated as no public comments were received;
- The public meeting notes/agenda are attached;
- The public meeting sign in sheet is attached.

15. Contractors and Named Subrecipients

Contractors

The EDCEC has not named federally procured contractor at this time. Upon award the EDCEC will issue a Request for Proposals / Request for Qualifications consistent with the procurement standards of 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

Named Subrecipients

The EDCEC has no named subrecipients as part of this grant application.



November 1, 2023

Ms. Tina M. Mengine, Executive Director
Enterprise Development Center of Erie County
1314 Griswold Plaza, Suite 100
Erie, PA 16501

RE: U.S. EPA Brownfields Grant Proposal | State Letter of Acknowledgement
Enterprise Development Center of Erie County
City of Erie
Erie County, Pennsylvania

Dear Ms. Mengine:

The PA Department of Environmental Protection acknowledges that the Enterprise Development Center of Erie County plans to conduct the cleanup of two brownfield sites and is applying for an FY24 EPA Brownfields Cleanup Grant.

The Enterprise Development Center of Erie County has developed an application requesting site-specific federal Brownfields Cleanup funding for the EMI and Quin T Sites located in the City of Erie.

The PA Department of Environmental Protection affirms that EMI and Quin T Sites:

- i. Are enrolled in the Pennsylvania DEP voluntary response program (Act 2).
- ii. Additional assessment is needed to sufficiently characterize the site(s) for the remediation work to begin. There will be a sufficient level of site characterization from the environmental site assessments performed by June 15, 2024, for the remediation work to begin on the sites.

The DEP supports the Enterprise Development Center of Erie County's application for a US EPA Brownfields Cleanup Grant in the amount of \$5 million to conduct remediation of these two vital sites in the City of Erie.



Both Central Office and Regional Office Staff in the Land Recycling Program look forward to supporting Enterprise Development Center of Erie County and U.S. EPA Region 3 on this project.

If you have any questions, please contact John Gross by email at johngross@pa.gov or by telephone at 717-783-7502.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael Maddigan".

Michael Maddigan
Bureau Environmental Cleanup and Brownfields