



217 Elm St., Oil City, PA 16301-1412 / 814.677.3152 / OilRegion.org

R03-24-C-002

IV.A. Narrative Information Sheet

Oil Regional Alliance (ORA) Cleanup Grant – Narrative Information Sheet

1. Applicant Identification
Oil Region Alliance of Business, Industry & Tourism (ORA)
217 Elm Street
Oil City, PA 16301
2. Funding Requested
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$999,730
3. Location: Oil City, Venango County, Pennsylvania
4. Property Information
Kraft Dahlstrom Site: 58 Spruce Street, Oil City, PA 16301
eFacts Site ID: 867225
5. Contacts
 - a. Project Director
Debra Sobina, Executive Vice President
(814) 677-3152, Ext. 109
dsobina@oilregion.org
217 Elm Street
Oil City, PA 16301-1412
 - b. Chief Executive/Highest Ranking Elected Official
John R. Phillips II, President/COO
Phone (814) 677-3152 ext. 108
jphillips@oilregion.org
217 Elm Street
Oil City, PA 16301
6. Population
The Kraft Dahlstrom Site is located in the City of Oil City which has a population of 9,685 (2017- 2021 American Community Survey).

7. Other Factors Applicants claiming one or more of the other factors below must provide a summary in the Narrative on the applicable other factor(s). Please identify which of the below items apply to your community/proposed project by noting the corresponding Narrative page number. **If none of the Other Factors apply to your community/proposed project, please provide a statement to that effect.**

Sample Format for Providing Information on the Other Factors	Page #
Community population is 10,000 or less.	1
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	NA
The proposed brownfield site(s) is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	NA
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The proposed site(s) is in a federally designated flood plain.	NA
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
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.	NA

1. Releasing Copies of Applications
NA

Oil Regional Alliance PA – Cleanup of the Kraft Dahlstrom Site

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Targeted Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area: The targeted area is Oil City, Venango County, Pennsylvania and the Kraft Dahlstrom brownfield site. Oil City is in Northwest Pennsylvania, 93 miles north of Pittsburgh and 60 miles south of Erie. The region’s manufacturing boom, fueled by the oil and gas industries, created a vibrant community which once housed the national headquarters for Pennzoil, Quaker State, and Wolf’s Head. With the decline of the oil and manufacturing industries in PA, all three companies moved their headquarters by the 1990s, leaving Oil City to struggle with poverty, population loss, and the poor health outcomes that are the legacy of brownfields. The population in Oil City peaked in the 1970s (15,033) and has since declined by 37% to 9,459 residents in 2022. The Kraft Dahlstrom site, with its salvage material and decrepit buildings, has created a barrier that physically separates the “Polish Hill” neighborhood from the rest of the community, resulting in significant disinvestment in the neighborhood and severe negative impacts to its residents. As compared to residents within the US, Polish Hill residents are in 91st percentile for low life expectancy, 96th percentile for heart disease, and 92nd percentile for asthma (USEPA EJSCREEN), and are disadvantaged according to Justice 40 CEJST criteria. USDA classifies Oil City as a food desert since residents lack access to healthy food, contributing to poor health. The distressed neighborhood in which this Kraft Dahlstrom brownfield is located must access its only food, a Dollar General, by lowering themselves down and climbing up by ropes on a steep dirt incline just yards from this target redevelopment area.

To improve economic and health outcomes for residents, the regional economic development non-profit Oil Region Alliance (ORA) is working with partners to redevelop brownfields throughout Venango County, including the Kraft Dahlstrom site. ORA successfully applied for a 2020 USEPA Community-wide Assessment Grant and a 2022 USEPA Community-wide Assessment Grant. Support from USEPA has enabled ORA to create a vision for redevelopment of the Kraft Dahlstrom site that includes the expansion of manufacturing, job training and job creation, a maker space/business incubator, access to fresh and healthy food, a path for a regional pedestrian/cycling trail, and enhanced and equitable recreational opportunities.

ii. Description of the Proposed Brownfield Site(s): The Kraft Dahlstrom site is located at 58 Spruce Street and is a combined parcel. ORA purchased and combined the Gil E Dahlstrom Iron & Metal site with the Kraft Concrete Products site to create a continuous 3.79-acre brownfield property. The Kraft Dahlstrom site is within the core of downtown Oil City and runs adjacent to the Western New York and Pennsylvania Railroad (WNYP), and Oil Creek, which flows into the Allegheny River about a half mile from the project site. The parcel is next to manufacturing space, office buildings, residential homes, and small retail/restaurants in what is known as the “Polish Hill” neighborhood. The property was developed as early as 1886 and over the years has been used for railroad operations, lumber supplies, concrete block manufacturing, cigar manufacturing, dry cleaning, and as a scrap yard.

ORA acquired the Kraft property on December 18, 2020, and the Dahlstrom property on July 8, 2022. EPA Community-wide Assessment funds supported Phase I and Phase II ESAs of both sites. A recently completed Phase II ESA found a heavy concentration of metals in soils on the Dahlstrom parcel, including antimony, arsenic, copper, lead, nickel, zinc, and mercury, in addition to arsenic on the Kraft parcel, all above regulatory action levels. ORA found organic constituents above regulatory action levels in soils underneath a removed Underground Storage Tank (UST), and also found organic constituents above regulatory action levels in soils and groundwater at the location of a former UST area. ORA is currently using the property for non-hazardous storage of supplies

that support the Oil City Main Street Program. The property also has remnants of scrap yard operations and two vacant buildings. The first is a former dry-cleaning building, and the second is the former scrapyards office and scale house. A homemade smelter has since been removed, as well as three other buildings that were demolished in 2021 as part of assessment and remedial measures. A Phase II ESA included the removal of scrap piles and debris to ground surface; demolishing and removal of a concrete block manufacturing building; installing 10 monitoring wells to characterize subsurface soils and groundwater; sampling groundwater; boring three additional soil sites; collecting 12 surface soil samples; digging trenches to locate potential USTs; removal of 2 unregulated USTs and soil testing; and X-raying surface soils.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans:

The Kraft Dahlstrom site is in downtown Oil City, next to thriving manufacturing, an active rail yard, small restaurants and shops, and housing. A mixed-use revitalization strategy aligns with the historical development patterns and current land use plans and requirements of Oil City. To achieve the reuse vision, ORA worked with a regional Steering Committee comprising dedicated residents, business owners, organizational representatives and elected officials who oversaw a robust public outreach process. To ensure that the reuse strategy aligns with market realities, ORA used EPA brownfield reuse planning funds to undertake a real estate market assessment which evaluated commercial opportunities for reuse at several brownfields in the region, including the Kraft Dahlstrom site. The market study pointed out a need for light industrial/flex space suitable for smaller businesses. In a nod to its manufacturing past, ORA intends to incorporate the existing scale house into the project, enabling the Webco Industries plant located on the adjacent property, to decrease truck traffic and resulting emissions as trucks must currently travel 6 miles to a similar facility. A parking lot will support this use, while safely capping contamination.

Beyond the site's reuse to support manufacturing, ORA plans to create a maker space and job training facility, a fresh foods market, new retail and commercial businesses, and park and outdoor recreational space. For the maker space and entrepreneurial center, ORA is partnering with local leaders and educational institutions to create a job training and placement program with a focus on brownfield assessment and cleanup, expanding economic opportunity where almost none exists today. While the initial emphasis of training and job placement will be on brownfield redevelopment, ORA will grow its partnerships to include a maker space/business incubator that focuses on research, training, and innovation for cradle-to-cradle manufacturing. The site is not in a federally designated flood plain.

For the fresh food market in this food desert, ORA is partnered with Core Goods, a small business that supports family farms, to place an indoor market offering fresh affordable foods at the future Kraft Dahlstrom site. To expand small business opportunities, ORA will work with the Venango County Redevelopment Authority to help community members open small retail and restaurants that will be supported by workers who can access the redeveloped property through the relocation of the Erie-to-Pittsburgh Rail Trail that currently runs on the roadway system in Oil City. The region has dreamed and planned for almost 20 years for the completion of the 270-mile rail trail. To increase access to outdoor recreation, ORA will build a playground and provide open green spaces for the community to enjoy that also act as stormwater infrastructure. This mixed-use emphasis on job creation, job training, and outdoor equitable recreation will complement and strengthen Oil City's CDBG Program for this Polish Hill neighborhood, the lowest income census tract in Venango County.

New construction at the site will also focus on improving economic opportunity and health outcomes for residents. ORA will explore the installation of micro-solar technology at the site, reducing the energy burden and carbon footprint of the new development.

ii. Outcomes and Benefits of Reuse Strategy: Oil City and Venango County will benefit from USEPA's investment in the remediation and upcoming reuse of the Kraft Dahlstrom site by expanding job training and increasing local job growth; providing healthy foods to residents currently in a food desert; improving access to small retail and restaurants; and decreasing truck traffic and resulting emissions by allowing Webco Industries access to a scale house across the street from its plant. ORA predicts 50 new family-wage jobs created at this future, revitalized brownfields. The project also boosts Oil City further into the outdoor recreation economy by integrating a segment of the Erie-to-Pittsburgh Trail onsite, which currently runs along unprotected roadways. Users of the trail must share the road with industrial and vehicle traffic and an active rail line. The relocated trail will create a walkable path for residents to access the redeveloped site with its expanded job training, new jobs, and fresh food where little exists today. Community members will also gain safe access to the 270-mile trail system, with its stunning rivers, vistas, and exemplary recreational opportunities. Following the remediation of the property, ORA will work with partners to construct a playground for the youths that live around the site, who comprise 19% of Census Tract 2007. The closest park is 1.4 miles away, along roadways lacking safe pedestrian facilities, with gaps in sidewalks. Increased recreational opportunities combined with access to fresh, healthy food will reduce the epidemic of obesity in Venango County. According to the Pennsylvania Department of Health, 31% of local residents are obese while 69% are overweight.

The project will integrate the installation of a micro-solar system to reduce the burden of the new development on the local electric infrastructure and reducing greenhouse gases. Increasing this benefit, all new construction will incorporate the latest energy efficiency measures and the remediation will use the Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups. While the property is not in a federal flood zone, integrating stormwater BMPs will also protect the property and surrounding properties from flooding, which climate change will increase in the coming years.

c. Strategy for Leveraging Resources i. Resources Needed for Site Characterization: With USEPA Community-wide Assessment funds, ORA has undertaken characterization and remedial planning work at the site. ORA does not expect needing additional funding for site characterization if the requested amount under the EPA Cleanup grant application is awarded and will be able to proceed with remediation by June 1, 2024, as affirmed by PADEP.

ii. Resources Needed for Site Remediation: ORA is completing site characterization and its remedial cleanup plan using its EPA grant, allowing the Kraft Dahlstrom site to be formally entered into the PA Voluntary Cleanup Program on September 27, 2023. With EPA support, ORA has also completed an ABCA, identifying the most cost-effective remedial approach to support the planned redevelopment effort at the site. If USEPA Cleanup funds are awarded, ORA does not anticipate needing further funding support to complete site remediation. If additional funds are required, ORA will apply to Pennsylvania's Industrial Sites Reuse Program (ISRP), which ORA has successfully leveraged at other sites. The PA Department of Community and Economic Development (PADCED) provides grants and low interest loan financing to perform environmental site assessment and remediation work at former industrial sites.

iii. Resources Needed for Site Reuse: ORA has significant experience leveraging local, state, federal, and philanthropic funds due to its designation(s) as the administrator of the Oil Region

National Heritage Area and the administrator of the Pennsylvania Oil Region Heritage Park. USEPA has supported the project with two Community-wide Assessment Grants, which enabled both a Phase I and Phase II assessment of the site. Working with Oil City, remedial planning and cleanup funds will support applications to the PA Department of Community & Economic Development (PADCED) and PA Department of Conservation and Natural Resources (PADCNR) for funding to implement the redevelopment plan and recreational features. EPA Cleanup funds will be utilized as a match for the PADCNR and PADCED grant applications. ORA is developing a robust “Resource Roadmap” for brownfields revitalization, which includes federal, state, and nonprofit grant funding. Funding opportunities include:

Name of Resource	Resource for (1.c.i) Assessment, (1.c.ii) Remediation, or (1.c.iii) Reuse	Secured or Unsecured	Additional Details or Info About Resource
PA Industrial Site Reuse Program grants/Loans	Assessment & Remediation	Unsecured	For brownfield cleanup
PA Redevelopment Assistance Capital Program (RCAP)	Reuse	Unsecured	For brownfield economic development projects
US EPA Job Training Grants	Reuse	Unsecured	For job training opportunities in brownfields
USDA Farmer’s Market Promotion Grants	Reuse	Unsecured	To expand access to healthy foods
National Park Service – Land & Water Conservation Grants	Reuse	Unsecured	To improve outdoor recreational opportunities
PA DNCR Regional Trail Grants	Reuse	Unsecured	For construction of trails
PennDOT Transportation Alternatives	Reuse	Unsecured	For development of bicycle/pedestrian facilities

iv. Use of Existing Infrastructure: The Kraft Dahlstrom site is located in downtown Oil City and is fully serviced by water, sewer, electric, and gas, avoiding the need for costly new infrastructure investments. The City of Oil City provides water, sewer, garbage and recycling services. Natural gas is provided by National Fuel Gas, electricity by Penelec/First Energy Corporation, and there are a variety of cable and internet providers. Direct road access exists along Spruce Street, which connects into State Highway 8 (Mainstreet). A key goal of redevelopment, however, is to develop on-site stormwater facilities to avoid placing extra strain on municipal infrastructure, as well as on-site energy generation, including micro-solar installations. ORA expects that the solar microgrid will require upgrades to energy infrastructure and will invite Penelec/First Energy Corporation to partner in the reuse strategy to ensure the electric utility has adequate infrastructure in place.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT a. Community Need

i. The Community’s Need for Funding: Oil City lacks the internal resources to clean-up the Kraft Dahlstrom site because of the decline in the oil manufacturing industry, depopulation, and generational poverty. As previously discussed, Oil City lost 37% of its residents from 1970 to 2022 and now is a small city of 9,459 residents. The community has a significant poverty rate, with 1,550 or 16.5% of its residents considered impoverished and 5.5% at 50% of the poverty level. Median household income is \$44,272, just under 60% of the US median household income (2021 American

Community Survey). The population continues to decline as young people move away, seeking employment. This contributes to the shrinking tax base, leaving few hands and little municipal funding available for the expertise to remediate and redevelop brownfield sites. Funding assistance is needed to jumpstart economic revitalization, provide job training and job opportunities, and create positive health outcomes with access to fresh healthy food and outdoor recreation. The oil manufacturing industry forgot Oil City, but cleanup funding from the USEPA will bring lasting, equitable, beneficial change.

ii. Threats to Sensitive Populations: (1) Health or Welfare of Sensitive Populations: According to USEPA's EJ Screen, residents are regularly exposed to pollution. Community members that live in the neighborhood surrounding the Kraft Dahlstrom site (Census Tract 2007) are in the 98th percentile for toxic releases to the air, 90th percentile for lead paint, 76th percentile for proximity to a RMP facility, 71st percentile for proximity to a hazardous waste facility, and 78th percentile for USTs as compared to other United States residents. The Climate and Economic Justice Screening Tool (CEJST) highlights that residents are disadvantaged according to health outcomes, income levels, lack of education, poverty, and presence of lead paint in their homes. According to the CDS/ATSDR Social Vulnerability Index, generational poverty and exposure to toxins have left residents highly vulnerable with a 0.84 ranking on its Social Vulnerability Scale, where 0 is the lowest vulnerability and 1 is the highest.

The remediation of this brownfield site will aid the health of the community. The site is a threat to public health through the exposure of residents to contaminated soils that are deposited into Oil Creek and by a total absence of stormwater management. Under current conditions, risk pathways include ingestion and inhalation of potentially hazardous materials and substances by site visitors and/or trespassers and downstream users of the creek. Project activities will effectively and safely remove and manage these contaminants, eliminating any potential impacts on human health and the environment. ORA's focus on redevelopment, job training, and job creation during reuse will increase resident's economic opportunity, breaking the cycle of poverty.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the Pennsylvania Department of Health's Profile for Venango County, residents suffer disproportionately from several health conditions compared to the state as a whole, largely attributed to the high prevalence of the oil and manufacturing industries and the significant number of contaminated sites in the area. Venango County has higher age-adjusted rates of all causes of death (822 per 100,000 vs. 788), heart disease (209 vs. 176), chronic lower respiratory diseases (42.3 vs. 35.3), diabetes mellitus (26.4 vs. 21.1) and female urinary bladder cancers (15.8 vs 10.1). According to the CEJST Tool, the community surrounding the Kraft Dahlstrom site is disadvantaged because of health outcomes, with residents being in the 93rd percentile for asthma and the 94th percentile for heart disease in the United States. Cleaning up these contaminated sites and creating new job opportunities will eliminate direct health risks to Oil City residents, reduce the overall amount of environmental toxins negatively affecting human health, and improve overall prosperity.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: When the oil and manufacturing boom ended in rural Northwestern PA, it left behind poverty and poor health outcomes. The residents around the Kraft Dahlstrom site live in a federally designated Opportunity Zone, are classified as a food desert by the USDA, and are in the poorest Census Tract (2007) in Venango County with 56.3% of the population considered low-to-moderate income (USHUD). Residents of this community are disadvantaged according to the CEJST Tool due to:

- **Health:** Percent of residents with asthma (93rd percentile) and heart disease (94th percentile).
- **High School Education:** Percent of people ages 25 years or older whose high school education is less than a high school diploma (10%).

- **Poverty:** Share of people in households where income is at or below 100% of the Federal poverty level (92nd percentile) and percent of people whose high school education is less than a high school diploma (10%).
- **Housing:** Share of homes that are likely to have lead paint (97th percentile).

(b) Advancing Environmental Justice: Cleanup funding from the USEPA will reduce the health impacts of the existing brownfield sites by removing contaminated soils, monitoring water quality, and implementing green stormwater management to reduce residents’ exposure to contaminants and protecting Oil Creek from polluted runoff. Project reuse will include a small produce market that will provide access to fresh, healthy food. Future site reuses will also include a playground for youths and the relocation of the Erie-to-Pittsburgh Trail, a 270-mile corridor of connected trails, increasing equitable access to recreation which will improve long-term health outcomes. Partnering with the Keystone Community Education Council, local school districts, higher educational institutions, and local business leaders to build a job training program and create a maker space/business incubator will provide economic opportunity where almost none exists today. By focusing educational and business opportunities on the local community, ORA will ensure that residents and local businesses benefit from federal investment and are not displaced.

b. Community Engagement i. Project Involvement and ii. Project Roles: The Kraft Dahlstrom project will build on the robust community engagement that ORA has conducted over the past three years with support of EPA Community-wide Assessment Grant funding. This engagement effort has resulted in the development of strong partnerships with entities within Oil City, throughout Venango County, and with Pennsylvania State Agencies. Organizations that will play a role in the execution of this cleanup grant include:

Supporting Organization	Contact – E-Mail	Role
City of Oil City	Mark G. Schroyer, manager@oilcity.org	Work with ORA to attract reuse to the site, and public outreach.
PA DCED	Jessica Trimble, jtrimble@pa.gov	Reuse planning assistance and financial support
PA DCNR	Erin Wiley Moyer, NW PA Rep, ewiley@pa.gov	Recreational planning and DCNR funding assistance
PA Department of Transportation	Brian McNulty, PE, brmcnulty@pa.gov	Transportation planning and funding assistance
Venango Economic Development Authority	Emily Lewis, elewis@co.venango.pa.us	Economic development expertise and support, county liaison
PADEP NWRO	Kimberly Yeakle, kyeakle@pa.gov	To support cleanup oversight
Erie-to-Pittsburgh Trail Alliance	Courtney Mahronich Vita courtney@friendsoftheriverfront.org	Facilitate the relocation of the trail onto the site and public outreach.
Venango Chamber of Commerce	Susan Williams, swilliams@venango.pa.us	Community engagement and insight
Keystone Community Education Council	Lance Hummer, lhummer@keystoneceec.org	Insight and partner for Job Training Program

iii. Incorporating Community Input: ORA will build upon the success of its current Steering Committee, which is overseeing community outreach in the assessment phase. The Steering Committee consists of dedicated residents, business owners, organizational representatives and elected officials, plus county-level and specialty advisors in economic and community development, sustainability, education, culture, and community resilience. The Steering Committee and ORA currently take public input and update the public through public meetings, weekly coffee chats,

neighborhood association gatherings, speaker bureaus, newsletters, dedicated web sites, social media, and the production of print materials. ORA understands that the residents, neighbors, and businesses in a proposed project area are the most socially vulnerable, least likely to interact with local initiatives, and will be the most impacted by the activities undertaken under this grant. ORA is committed to equitable community involvement, making authentic, effective, and meaningful public participation a key component of the project process. Towards this end, the project team will document public comments, respond as necessary, and highlight how community input has shaped the cleanup project and related development efforts. Meetings and events are regularly held in remote or hybrid form and in-person. English is currently the only language needed to communicate within the target area, though several members of ORA and partner organizations do speak and write in other languages should the need arise to communicate with anyone not proficient in English.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS a.

Proposed Cleanup Plan: Cleanup Plan: ORA proposes to remediate the site by demolishing and removing or capping all contaminated materials, while monitoring air and water quality throughout the process. The remedial cap will be either clean soil or asphalt, depending on the reuse in particular areas of the site. Project activities will include the development of a health and safety plan, project oversight during remediation, revegetation, and storm water improvements for the site following removal. Contaminated media to be removed include tires, soil contaminated with antimony, arsenic, copper, lead, nickel, and zinc, and other yet-to-be-identified substances. Where levels of metals current do not exceed regulatory action levels, the project will address metals through qualitative risk assessment since direct contact will not have unacceptable risk to future users of the site. This will effectively address the heavy concentration of metals in soils found during a Phase II Environmental Assessment.

b. Description of Tasks/Activities and Outputs

<p>Task 1 – Programmatic Management: ORA, led by the Project Manager, will be responsible for programmatic oversight throughout the project. The Project Manager will oversee the process to ensure selection of a Qualified Environmental Professional (QEP) and a Grant Manager, by competitive RFQ. The QEP will assist the Project Manager in competitively procuring a remediation contractor to complete cleanup activities. The project team, consisting of the Project Manager, QEP, and remediation contractor, will have regular meetings for the remainder of the period of performance to ensure the project remains on schedule and within budget.</p>
<p>i. Anticipated Schedule: Grant Term</p>
<p>ii. Task/Activity Lead(s): Project Manager and QEP</p>
<p>iii. Outputs:</p> <ul style="list-style-type: none"> • Project Manager competitively procures QEP and Grant Manager; Project Kick-off Meeting, including Competitively Procured QEP; Monthly Project Update Meetings • Personal: 1,154 hrs of ORA staff/Project Manager over 2 years to provide project oversight, \$38.22/hr salary = \$44,106. • Fringe: 1,154 hrs of ORA staff/Project Manager at \$5.09 per hour = \$5,874. Grant Management - Project Meetings: \$2,400; 8 Quarterly Reports: \$4,800; 2 Sets of Annual & DBE Reports: \$800; 1 Closeout Report: \$800 = \$8,800 – Contractual.
<p>Task 2 – Health & Safety Plan: The QEP will oversee the development of a HASP in accordance with relevant OSHA guidelines to ensure that all work by the Remediation Contractor and their subcontractors is done in a manner that protects on-site workers and the public.</p>
<p>i. Anticipated Schedule: Month 1</p>
<p>ii. Task/Activity Lead(s): QEP</p>
<p>iii. Output: Site Specific HASP: 33 hours @ \$150 an hour = \$4,950 Contractual</p>

Task 3 – Procurement of Remediation Contractor: The Project Manager, assisted by the QEP, will manage the procurement process in accordance with applicable local, state, and federal laws and regulations. The Project Manager and QEP will hold a public meeting to explain and accept public input on the remediation plan. The QEP will prepare project-specific bid specifications and bid documents, oversee a mandatory pre-bid site meeting, provide written answers to written questions provided by the bidders, evaluate and rank bids received, and present professional opinions regarding bid scopes and costs to the Project Manager for consideration and selection of the Remediation Contractor.

i. Anticipated Schedule: Months 4 - 12

ii. Task/Activity Lead(s): Project Manager and QEP

iii. Outputs:

- Public Meeting
- Bid Specifications/Bid Documents; Public Bid Announcement (Request for Bids)/ Pre-bid meeting log and notes; Bidder Questions and Answer Documents; Award of Contract
- Contractual = 100 hours @ 150 an hour = \$15,000

Task 4 – Removal of Soil and Other Debris: The selected remediation contractor will be responsible for all demolition, waste management, waste removal, waste transportation and disposal, site restoration, associated permits and approvals, air monitoring, health and safety of its employees and subcontractors, provision of financial assurance, and adherence to all bid specifications. The QEP will provide field oversight, ensure all bid requirements are satisfied, review contractor invoices, review change orders, and act as the owner representative throughout the contracted work. At the conclusion of the work, the QEP will create contract closeout documents for execution by the owner and contractor.

i. Anticipated Schedule: Months 12 - 18

ii. Task/Activity Lead(s): QEP, Contractor, and Project Manager

iii. Outputs:

- Survey/Design: 114 hours @ 150/hr = \$17,100 and QEP Oversight: 23 hours @150/hr = \$3,900 **Total Contractual = \$21,000**
- Surface Debris/Tire Removal = \$14,750; Grading and Leveling = \$65,000; Erosion and Sedimentation Control = \$30,000; Building Demolition = \$11,000; Hot Spot Excavation/Landfilling: 25 Ton @ 300 /Ton = \$7,500; Soil Cap: 2 ft clean fill 2450@ \$75 per CY = \$183,750; Asphalt Cap: 4 Inch Asphalt Cap – 31,000 SQFT @\$10/SQFT = \$310,000; Stormwater Management/Green Infrastructure: \$155,000; Revegetation/Stabilization of Cap: 31,000 SQFT @\$3/SQFT = \$93,000
- Total Construction for Remediation Contractor = **\$870,000**

Task 5 – Project Closure Report and Regulatory Coordination: At the conclusion of the project, the QEP will create a project closure report that will document the remediation activities conducted and gain Act 2 approval. This report will be retained by the Project Manager and may be shared with the Pennsylvania Department of Environmental Protection to document the removal of waste from the property. The QEP will finalize all intuitional controls, deed restrictions, and environmental costs.

i. Anticipated Schedule: Months 18-24

ii. Task/Activity Lead(s): QEP

iii. Outputs: Project Closure/Regulatory Coordination: 200 hours @ 150/hr = \$30,000 Contractual

c. Cost Estimates:

Budget Categories	Project Tasks				Project Closure Report/Regulatory Coordination	Total
	Programmatic Management	Health & Safety Plan	Procurement - Remediation Contractor	Removal of Soil and Other Debris		
Personnel	\$44,106					\$44,106

Fringe	\$5,874					\$5,874
Travel						
Equipment						
Supplies						
Contractual	8,800	\$4,950	\$15,000	\$21,000	\$30,000	\$79,750
Construction				\$870,000		\$870,000
Other – Administrative						
Total Direct Costs	\$58,780	\$4,950	\$15,000	\$891,000	\$30,000	\$999,730
Indirect Costs						
Total Federal Funding	\$58,780	\$4,950	\$15,000	\$891,000	\$30,000	\$999,730
Total Budget	\$58,780	\$4,950	\$15,000	\$891,000	\$30,000	\$999,730

d. Measuring Environmental Progress and Results The Project Manager, working closely with the QEP, will systematically track and measure progress and will appoint a staff member dedicated to ensuring that project outputs and outcomes are accurately tracked, analyzed, and reported. Internal and/or consultant project management software will be used to confirm that the Kraft Dahlstrom cleanup activities are moving along, and that project outputs and outcomes are being achieved. Output and outcome data will be routinely entered into ACRES. The project team will ensure that the project is meeting its schedule milestones and actions will be taken to correct and steer lack of progress.

4. PROGRAMMATIC ABILITY AND PAST PERFORMANCE a. Programmatic Capability

i. Organizational Structure and ii. Key Staff: A 16-member Board, which includes representation from the City of Oil City, governs ORA. John R. Phillips, II has been the President and CEO of ORA for 13 years. He has overseen the expansion of ORA’s mission to include brownfield redevelopment. He works closely with Debra Sobina, the Executive Vice President. Ms. Sobina will be the Program Manager for ORA. Throughout the years, she served numerous ORA board terms and offices, including that of Treasurer, where she oversaw ORA’s financial reporting, including grant awards. ORA is designated by federal legislation as the administrator of the Oil Region National Heritage Area and regularly manages federal funding. These funds are subject to all federal procurement requirements, and Debra is responsible for bidding, awarding, and managing these contracts. To ensure the successful grant management of EPA Cleanup funding, ORA will competitively procure a grant management professional.

iii. Acquiring Additional Resources: With EPA funding, ORA will release a publicly advertised RFQ for a Qualified Environmental Professional (QEP), rank responses based on experience and skills, and select a QEP. ORA will use this same process to obtain a professional Grant Manager. Because of its lean structure, ORA can act quickly to advertise for consultants, review qualifications, and make final selections. ORA will require that the QEP and Grant Manager have extensive experience with USEPA’s Cleanup Grant Program. The Grant Manager and QEP will assist in fulfilling the protocol and reporting requirements under the Cleanup Grant. This includes developing the Community Relations Plan, managing environmental consultants, managing public comment, quarterly reporting, ACRES reporting, and close-out reports. ORA will fulfill federal bidding and minority business/women business reporting requirements. The project team (Program Manager, Grant Manager, and QEP) will meet monthly to review project costs relative to budgets,

pursue leveraged resources, and monitor all project activity and review the overall status of the project quarterly to submit the Quarterly Report.

To ensure that the residents of Oil City benefit from the federal investment of the Cleanup Grant, ORA will advertise the project with a preference for local DBEs and include opportunities for minority-owned businesses to compete for the work in the bidding process. ORA will require companies that bid on its remediation contract allow free and fair choice to join a union. To create meaningful employment opportunities for low-income residents, ORA will seek Brownfields Job Training (JT) Grants, in partnership with the Keystone Community Education Council to provide brownfield assessment and cleanup skills training. Keystone Community Education Council works with educational organizations and technical centers to bring Technical Certificate Programs that address the “skills gap” problem to the underserved rural counties of Northwest PA, including Oil City.

a. Past Performance and Accomplishments i. Currently Has or Previously Received an EPA Brownfields Grant (1) Accomplishments: ORA was awarded and successfully managed a 2020 Community-wide Assessment Grant which closed out on April 21, 2023. Funds supported a redevelopment vision for an eight-mile stretch of the Allegheny River in Northwestern PA, including the Kraft Dahlstrom site. At the Dahlstrom Kraft site, the Assessment Grant resulted in a Phase I ESA, which led to the determination that additional assessment and future remediation would be required. With EPA’s continued support, ORA removed two USTs, installed 10 monitoring wells, undertook extensive groundwater and the soil sampling, performed XFR screening, and demolished one building to better characterize existing soils. All while undertaking community outreach and a regional market analysis, including a conceptual reuse plan. ORA used this EPA funding to conduct a Phase II Assessment, install monitoring wells, and conduct groundwater and soil sampling at the Fuchs site. ORA was able to leverage \$1 million in remediation funding for the Fuchs site, using Brownfield Assessment funding as match for the PA ISRP grant. The 2022 Community-wide Assessment Grant allowed ORA to move forward with a Phase I ESA at the Kraft Eclipse Site and a Phase II Assessment of the Kraft Dahlstrom site, the findings of which were presented to PADEP on September 29, 2023 and enable us to move the site into the state’s VRP. All achievements have been accurately reported in ACRES.

(2) Compliance with Grant Requirements: ORA has a successful, nearly 20-year history of managing federal grants from the National Park Service, the Department of Labor, Department of Transportation, Department of Housing and Urban Development, Department of Agriculture, and Small Business Administration, as well as state level and local grants. ORA has added the successful management of USEPA grants to its track record of success with its timely reporting and effective management of its 2020 EPA Community-wide Assessment Grant and its current management of a 2022 Community-wide Assessment Grant. ORA’s first assessment grant (BF96377801) closed out in March 2023, six months ahead of its period of performance. The funds were all expended in accordance with the workplan. All quarterly and annual reports were submitted on time and site information was updated in ACRES throughout the grant period. All closeout reporting was completed as required. ORA's current grant (4B95301801) started 10/1/2022 and ends 9/30/2025. The project is currently meeting all workplan targets, all quarterly and annual reporting has been submitted on time, and all site information is up to date in ACRES. All fiscal activity is managed in-house and is tied into the organization’s electronic accounting system, which is audited annually. The ORA has two close-out specialists to ensure that grants are closed out on time and within the budget with grant funds expended. All requirements are satisfied, including timely filing of quarterly reports and financial status reports. ORA will successfully complete its workplan and expend funding on time by using its proven project and management policies and practices.

***CITY OF OIL CITY, PENNSYLVANIA
KRAFT DAHLSTROM SITE CLEANUP GRANT
APPLICATION THRESHOLD CRITERIA***

Name of Applicant: Oil Regional Alliance of Business, Industry & Tourism (ORA)

1. Applicant Eligibility:

- a. Incorporated in 2005, the Oil Region Alliance of Business, Industry & Tourism (ORA) is a private Pennsylvania non-profit corporation under the laws of the Commonwealth of Pennsylvania and a 501 (c) (3) under the United States Internal Revenue Service. ORA is eligible to be a recipient of U.S. EPA Brownfield Cleanup funding. Please see attachments.
- b. ORA is a 501 (c) (3) under the United States Internal Revenue Service, not a 501 (c) (4).

2. Previously Awarded Cleanup Grants: ORA has not previously received a Cleanup Grant for the Kraft Dahlstrom Site.

3. Expenditure of Existing Multipurpose Grant Funds: ORA does not have an open U.S. EPA Brownfields Multipurpose Grant.

4. Site Ownership: The Oil Region Alliance of Business, Industry & Tourism (ORA) is the sole owner of the proposed site seeking U.S. EPA Cleanup Grant funding. ORA acquired the combined site of Kraft Dahlstrom in two different transactions. The Dahlstrom parcel was deeded to the Oil Region Alliance by the Estate of Gilbert E. Dahlstrom, Jr. for one dollar on July 8, 2022. The Kraft parcel was purchased from Kraft Concrete Products, INC. for \$18,000 on December 16, 2020. Proof of ownership is attached. ORA has since legally merged the two properties into one property. ORA intends to own the Kraft Dahlstrom Site for the duration of the time in which U.S. EPA Brownfield Cleanup Grant funds are disbursed for the cleanup of the property.

5. Basic Site Information:

- a. **Site Name:** Kraft Dahlstrom Property
- b. **Address:** 58 Spruce Street, Oil City, PA 16301
- c. **Current Owner:** Oil Region Alliance of Business, Industry & Tourism (ORA)

6. Status and History of Contamination at the Site:

- a. Contaminants: The site is contaminated by hazardous substances.
- b. Operational History and Current Use: Oil City's manufacturing history started in

1824. While currently a combined site, the original Kraft parcel was owned by Kraft Concrete Products and the Dahlstrom site was owned by Gil E Dahlstrom Iron & Metals. The site was developed as early as 1886 and was historically used for railroad operations, lumber supplies, concrete block manufacturing, cigar manufacturing, dry cleaning, and as a scrap yard. The parcel currently has the remnants of the scrap yard operations along with vacant buildings. The existing Erie-to-Pittsburgh Rail Trail currently cuts through Oil City on nearby surface roads, but ORA intends to move that Rail Trail onto the Kraft Dahlstrom site, as part of the remedy and redevelopment, to increase safety and recreational access.

- c. **Environmental Concerns:** Based on a 2020 Phase I ESA and 2023 Phase II ESA conducted using U.S. EPA Brownfields Community-Wide Assessment resources, ORA has determined that there are known hazardous substances at the site including a heavy concentration of metals in soils on the Dahlstrom parcel. Metals which exceed Pennsylvania regulatory threshold levels include antimony, arsenic, copper, lead, nickel, zinc, and mercury. Arsenic above regulatory threshold levels is also present on the Kraft parcel. Organic constituents were found above regulatory action levels in soils underneath a removed Underground Storage Tank (UST), and organic constituents were also found above regulatory action levels in soils at a former UST with reported levels above regulatory action in groundwater. At a September 29, 2023, Pennsylvania Department of Environmental Protection (PADEP) meeting, PADEP requested further characterization work on groundwater, but no additional site characterization work was proposed or requested for soils.
 - d. **How the Site Became Contaminated:** The site has historically been used for railroad operations, lumber supplies, concrete block manufacturing, cigar manufacturing, dry cleaning, and as a scrap yard. Contamination at the site was a result of the heavy industrial past use of the site including former USTs, the possible disposal of dry-cleaning products, and the haphazard nature of the previous scrap operations including uncontained storage of batteries, drums, gasoline tanks, heavy metals and the use of homemade smelters on the site.
7. **Brownfields Site Definition:** The Kraft Dahlstrom Site is a “Brownfield” under CERCLA Section 101(39) as already determined by PADEP when it accepted ORA’s Notice of Intent to Remediate (NIR) on September 27, 2023, and also as confirmed by U.S. EPA Region 3 when it approved the use of ORA’s EPA Community-Wide Assessment grant to conduct assessment activities at this site. The site is not listed or proposed for listing on the National Priorities List; is not subject to any unilateral administrative orders, consent orders, administrative orders on consent, or judicial consent decrees issued to or entered into parties under CERCLA or any other law, regulation or judicial process; and is not subject to the jurisdiction, custody or control of the U.S. government.
 8. **Environmental Assessment Required for Cleanup Grant Applications:** ORA worked with the environmental professional firm Moody and Associates to conduct and prepare an ASTM Phase I Environmental Assessment dated December 18, 2020, which complied with ASTM 1527-13 standards. ORA presented the findings of a Phase II Assessment to PADEP

on September 29, 2023. The draft Phase II Assessment was written to ASTM E1903-19 standards and included the removal of scrap piles and debris to ground surface; demolishing and removal of a concrete block manufacturing building; installing 10 monitoring wells to characterize subsurface soils and groundwater; sampling groundwater; boring three additional soil sites; collecting 12 surface soil samples; digging trenches to locate potential USTs; removal of 2 unregulated USTs and soil testing; and X-raying surface soils.

9. **Site Characterization:** ORA attaches a current letter from PADEP that affirms that the Kraft Dahlstrom site is eligible to be enrolled in the state response program and that PADEP formally entered the Kraft Dahlstrom site into the PA Voluntary Cleanup Program on September 27, 2023. The letter also affirms that there is a sufficient level of site characterization for remediation work to begin at the Kraft Dahlstrom site by June 15, 2024, or as soon as remediation funding becomes available.
10. **Enforcement or Other Actions:** There are no known ongoing or anticipated environmental enforcement or other actions related to the Kraft Dahlstrom site.
11. **Sites Requiring a Property-Specific Determination:** The Kraft Dahlstrom brownfield does not require a property specific determination from U.S. EPA to be fundable with this Cleanup grant.
12. **Threshold Criteria Related to CERCLA/Petroleum Liability:** The Kraft Dahlstrom site is contaminated with hazardous substances.

Pursuant to CERCLA Section 104(k)(3)(E), ORA is eligible for U.S. EPA Brownfield Cleanup grant funding under bona fide prospective purchaser liability protection.

- (a) **Information on Property Acquisition:** The Dahlstrom parcel was deeded to the Oil Region Alliance (ORA) by the Estate of Gilbert E. Dahlstrom, Jr. for one dollar on July 8, 2022. ORA now has fee simple ownership and is the sole owner of the parcel that comprises the site. ORA affirms that there are no familial, contractual, corporate, or financial relationships or affiliations with the prior owners, operators, or other potentially responsible parties for the property.

The Kraft parcel was purchased from Kraft Concrete Products, INC. for \$18,000 on December 18, 2020. ORA now has fee simple ownership and is the sole owner of the five parcels that comprise the site. ORA affirms that there are no familial, contractual, corporate, or financial relationships or affiliations with the prior owners, operators, or other potentially responsible parties of the property.

- (b) **Pre-Purchase Inquiry:** A Phase I Environmental Site Assessment (ESA) was completed by Moody and Associates on December 18, 2020, for the Kraft site. The Phase I ESA was conducted in conformance with the scope and limitations of ASTM Standard E 1527-13 and consistent with the All-Appropriate Inquiries Final Rule at 40 Code of Federal Regulations (CFR) Part 12. The Moody and Associates team was led by environmental professional Mark Miller, P.G., Vice President/Senior Associate, who brings 34 years of

experience managing environmental liability, risk assessment, remediation, and regulatory compliance. He is a seasoned brownfield development consultant, having represented economic development agencies and municipalities throughout Pennsylvania in the acquisition and implementation of state and federal Brownfield Assessment and Cleanup Grants. Through these grants, Mr. Miller has overseen assessment, demolition, remediation, removal of underground storage tanks, installation and testing of monitoring wells, state superfund site work, and provided expert testimony in the fields of geology and hydrology. He is a subject expert in Pennsylvania environmental laws and regulations, including the Land Recycling and Remediation Standards Act (Act 2), Clean Streams Law, and the Storage Tank and Spill Prevention Act. Mark led the Phase I ESA, which was conducted less than 180 days prior to the date ORA acquired the Kraft Site on December 18, 2020.

A Phase I ESA was completed by Moody and Associates on December 18, 2020 for the Dahlstrom site. ORA affirms that it conducted the appropriate updates in the original assessment within 180 days prior to its acquisition of the property to take advantage of the bona fide prospective purchaser provision due to the following:

- i. Under the U.S. EPA All Appropriate Inquiries Rule at 40 CFR Section 312.20(g), “[t]o the extent that there are data gaps . . . in the information developed as part of the inquiries . . . that affect the ability of persons (including the environmental professional) conducting all appropriate inquiries to identify conditions indicative of releases or threatened releases . . . Sampling and analysis may be conducted to develop information to address data gaps.”
- ii. ORA decided to get more information beyond the Phase I to address data gaps as part of its All Appropriate Inquiries (AAI), given the historical uses of the Dahlstrom site for scrapyard, dry cleaning, and industrial uses. In April 2022, U.S. EPA Region 3 approved allowing ORA to move forward with additional assessment activities at the Dahlstrom site using ORA’s EPA Brownfield Community-wide Assessment Grant. On May 6, 2022, ORA’s environmental professional Moody submitted a Sampling & Analysis Plan for the Dahlstrom site to U.S. EPA which was approved. Additional soil samples were conducted, and analytical results came into Moody for review starting June 30, 2022 through July 7, 2022.
- iii. Based on these sampling results, ORA determined that the future remedy of these contaminants would be manageable with U.S. EPA and other support and determined to close on the acquisition of the Dahlstrom property. That property transaction took place on July 8, 2022.

Thus, ORA conducted AAI before its July 8, 2022 purchase of this Dahlstrom property, and this was conducted up to just before the site purchase.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal: All disposal of hazardous substances at the Kraft Dahlstrom Site occurred before ORA acquired the properties on December 18, 2020 and July 8, 2022. ORA affirms that it has not caused or

contributed to any release of hazardous substances at the site at any time, nor since December 18, 2020 for the Kraft Site and July 8, 2022 for the Dahlstrom Site. ORA affirms that it has not, at any time before, on or since December 18, 2020 for the Kraft Site and July 8, 2022 for the Dahlstrom Site, ever arranged for the disposal of hazardous substances at the site, transported hazardous substances to the site.

- (d) **Post-Acquisition Uses:** The site has remained idle since the ORA's acquisition of the property and has had no uses by persons or entities other than ORA which is using the property for non-hazardous storage of a supplies that support the Oil City Main Street Program.
- (e) **Continuing Obligations:** Since taking ownership of the site, ORA has conducted no activities at the site that would disturb or exacerbate the existing conditions. To prevent any threatened future release of containments, ORA removed scrap piles and debris to ground surface on the Dahlstrom parcel and disposed of this non-hazardous debris offsite. In addition, ORA identified, excavated, and disposed of two unregulated tanks offsite.

ORA confirms its commitment to complying with any land use restrictions and not impeding the effectiveness or integration of any institutional controls; assisting and cooperating with those performing the cleanup and providing access to the property; complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and providing all legally required notices.

13. Cleanup Authority and Oversight Structure:

- a. **Site Cleanup Oversight:** ORA, led by the project manager, will be responsible for programmatic oversight throughout the project. The Project Manager will procure a Qualified Environmental Professional (QEP) through a competitive bid process. The QEP will assist the Project Manager in competitively procuring a remediation contractor to complete cleanup activities. Following procurement, an initial meeting will be held to kick off the project. The project team, consisting of the Project Manager, QEP, and remediation contractor, will collaborate with U.S. EPA OBLR and the Pennsylvania Department of Environmental Protection (PADEP) to ensure effective implementation and oversight of the Kraft Dahlstrom brownfield cleanup.

ORA enrolled the Kraft Dahlstrom site in the Pennsylvania Voluntary Cleanup Program on September 27, 2023.

- b. **Adjacent or Neighboring Site Access:** Based on the extensive assessment and remedial planning already conducted by ORA with the support of environmental professionals, it is not anticipated that the cleanup response at the Kraft Dahlstrom site will impact adjacent properties or neighboring sites for any reason.

14. Community Notification: The greater Oil City community was given the opportunity to comment from the dates beginning on October 25, 2023, and ending on November 9, 2023,

with a Community Meeting held specifically to discuss the application on November 8, 2023.

- a. **Draft Analysis of Brownfields Cleanup Alternatives:** A draft ABCA was presented at the community meeting held on November 8, 2023, and notice was given to the public that the ABCA could be made available to anyone upon request.
- b. **Community Notification Ad:** The Community Notification Ad, which was published on October 25, 2023, in the local newspaper the Oil City Derrick, which is over two full weeks before the November 13, 2023, submission of this grant application to U.S. EPA, and also more than two weeks before the community meeting on November 8th.
- c. **Public Meeting:** A public meeting to discuss the draft application and consider public comments prior to the submittal of this application was held at 2:00pm on November 8, 2023. This meeting was held at the Oil City Pulaski Club building located at 52 Spruce Seneca Street, Oil City PA, 16301. A summary of the public comments received, the applicant's response to those comments, meeting notes, and a meeting sign-in-sheet are attached here.
- d. **Submission of Community Notification Documents:** see attached supporting documents including the draft ABCA, copy of the newspaper ad regarding public comment and a public meeting, the summary of the public comments received, ORA's response to the public comments, meeting notes from the public meeting, and the meeting sign-in sheet/participant list. No public comments were received outside of the public meeting.

15. Contractors and Named Subrecipients

Contractor: N/A

Subrecipient: N/A



October 25, 2023

Mr. John R. Phillips, II
President/CEO
Oil Regional Alliance of Business, Industry and Tourism
217 Elm Street
Oil City, PA 16301-1412

RE: US EPA Brownfields Cleanup Proposal/State Letter of Acknowledgement
Oil Region Alliance of Business, Industry and Tourism
Kraft Dahlstrom Site – eFacts ID 867225

Mr. Phillips:

The Pennsylvania Department of Environmental Protection (PA DEP) is pleased to support your efforts to redevelop brownfield properties in your community. Returning environmentally challenged and underutilized land and buildings to productive use improves our environment, safeguards residents, and helps boost Pennsylvania's economy.

The PA DEP supports the Oil Region Alliance of Business, Industry and Tourism's (ORA) application for a US EPA Brownfields Cleanup grant to remediate the Kraft Dahlstrom site located at 58 Spruce Street, Oil City, PA 16301. The site was formerly used for concrete manufacturing and as a scrapyard.

As required for an application for Brownfield Cleanup funding from the US Environmental Protection Agency, this letter serves to acknowledge that the ORA will have adequately characterized the site in preparation for remediation once funding is secured. To that end, PA DEP confirms the following:

1. A pre-application meeting was held with PA DEP's Northwest Regional Office (NWRO) staff on September 29, 2023, to review site characterization information, to discuss potential remediation approaches and for ORA to express their intention to enter the site into the Land Recycling Program which is PA's Voluntary Cleanup Program (VCP).
2. PA DEP NWRO reviewed available data and agreed that enough information was available to develop an Analysis of Brownfield Cleanup Alternatives and identify a preferred remedial approach. PA DEP advised ORA as to requested additional characterization to be conducted prior to submitting the PA DEP-required Final Remedial Investigation Report as part of the VCP process.
3. ORA already has an EPA-approved Sampling and Analysis Plan allowing them to conduct the requested additional characterization immediately using their current US EPA Brownfield Assessment grant funds. It is our understanding that the additional site

characterization at the Kraft Dahlstrom site will be completed during the next 6 months if not sooner.

4. Based on the understanding and commitment of next characterization steps, ORA has submitted and PA DEP has accepted the Notice of Intent to Remediate (NIR) which formally entered the Kraft Dahlstrom site into the PA VCP as of September 27, 2023.
5. PA DEP concurs that ORA will have a sufficient level of site characterization for the remediation work to begin at the Kraft Dahlstrom site by June 15, 2024 or as soon as remediation funding becomes available.

Both Central Office and Regional Office Staff in the Land Recycling Program look forward to supporting Oil Regional Alliance 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 J. Maddigan". The signature is fluid and cursive, written over a light blue horizontal line.

Michael Maddigan

Land Recycling Program Manager

Bureau Environmental Cleanup and Brownfields