



**NARRATIVE INFORMATION SHEET:  
Moving Pillsbury Forward**

**1. Applicant Identification:**

Moving Pillsbury Forward, NFP  
PO Box 404  
Springfield, IL 62705

**2. Funding Requested:**

- a. Grant Type: Single Site Cleanup – Hazardous Substances
- b. Federal Funds Requested: \$2,652,300

**3. Location:**

- a. City: Springfield
- b. County: Sangamon County
- c. State: Illinois

**4. Property Information:**

The former Pillsbury Mills site is a large-scale demolition and redevelopment plan for a significantly blighted, former industrial property in the Pillsbury Neighborhood of Springfield, Illinois. The 18-acre site has been abandoned for several years, is partially demolished, and has become a significant challenge for the surrounding neighborhood and greater Springfield area. The full address for this site is:

- Site Name: Former Pillsbury Mills Site
- Site Address: 1525 E. Phillips Avenue, Springfield, Illinois, 62702

**5. Contacts:**

**a. Project Director:** Mr. Chris Richmond, Board President  
PO Box 404  
Springfield, IL 62705  
Phone: 217-899-2749  
Email: [movingpillsburyforward@gmail.com](mailto:movingpillsburyforward@gmail.com)

**b. Chief Executive:** Mr. Chris Richmond, Board President  
 PO Box 404  
 Springfield, IL 62705  
 Phone: 217-899-2749  
 Email: movingpillsburyforward@gmail.com

**6. Population:** City of Springfield – 114,394 (US Census, 2020)

**7. Other Factors Checklist:**

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less	N/A
The applicant is, or will assist a federally recognized Indian tribe or United States territory	N/A
The priority brownfield site(s) is impacted by mine-scarred land	N/A
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.	N/A
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).	N/A
The priority site(s) is in a federally designated flood plain	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy	2,3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures	2,3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments	2,3
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	N/A

**8. Releasing Copies of Application:**

Not Applicable. This application does not have confidential, privileged, or sensitive information included that cannot be shared.

## **1: PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:**

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### **1.a. Target Area and Brownfields**

#### **1.a.i. Overview of Brownfield Challenges and Description of the Target Area**

The former Pillsbury Mills facility, located at 1525 E. Phillips Avenue on the north east side of the City of Springfield, closed over 20 years ago. Once a vibrant symbol of pride—a sprawling 18-acre complex with rail access, 26 buildings, and 190 massive grain storage silos, the site served as a major employer and a bustling food processing plant. However, following its sale to scrappers, the site deteriorated and became a health and safety hazard, causing concerns for the community. In 2017, U.S. EPA intervened and performed an urgent removal of asbestos-containing building materials at the site resulting from the improper demolition activities. Since it's closing, the 18-acre site has been abandoned, is partially demolished, and has become a significant challenge for the surrounding neighborhood and greater Springfield area. Approximately 12,000 people live within a one-mile radius of the Pillsbury facility, and cleanup of the site will have a broad, positive impact on the northeast Springfield neighborhood where it resides. The property has faced significant legal entanglements and is known to be contaminated with asbestos, asbestos-containing paint, and lead paint, which has completely stalled the future redevelopment of the site. The former Pillsbury site's surrounding neighborhoods are among the most severely impoverished in Springfield. Twenty-five percent of the population does not have a high school diploma, and the median household income is about \$25,000. The Pillsbury cleanup efforts are directly confronting the problem that impoverished communities are more likely to suffer from a lack of clean water and air and a lack of safe housing. These conditions are often the direct result of industrial facilities' frequent proximity to low-income neighborhoods. Removal of the existing structures and redevelopment of the site into a productive end-use will provide the area with significantly greater public safety, health, environmental health, social justice, and economic development benefits. This cleanup grant will be the next meaningful step to overcoming the challenges currently facing the community due to the former Pillsbury Mills brownfields site. The former Pillsbury Mills cleanup site is located near the heart of the City of Springfield, so this site is highly visible to residents and visitors. The area surrounding the former Pillsbury Mills site is diverse and includes residential, commercial, industrial and recreational land uses. The Target Area of this grant application will be the two Census Tracts that encompass the former Pillsbury Mills site: Census Tract 7 (17167000700) and Census Tract 8 (17167000800). These Census Tracts are home to a combined population of 4,328 people, who are home to some of the most impoverished neighborhoods throughout the entire City of Springfield with poverty rates in the 97<sup>th</sup> percentile<sup>1</sup> and a 94.21% low-to-moderate income population<sup>2</sup>. Both Census Tracts in the Target Area have been characterized as Disadvantaged.

Moving Pillsbury Forward, (referred to as MPF) formed as a registered not-for-profit corporation in October 2020 after beginning as a community working group in November 2019 to study the Pillsbury site's public safety, known environmental issues, and to develop recommendations for long-term redevelopment solutions for the site. After a year of study and collaboration with community stakeholders and elected officials, formation of a not-for-profit presented the most viable path for achieving a workable and successful long-term redevelopment solution for the community and the site. In March 2022, MPF took ownership of the former Pillsbury site, moving the group's goals forward in a very compelling way. MPF's purpose is to facilitate community redevelopment efforts to successfully eliminate and prevent blight in and around the former Pillsbury Mills site. Moving Pillsbury Forward is not the first group that attempted to tackle the former Pillsbury Mills site in Springfield. In July 2005, Brownfields Redevelopment Strategy Sessions were initiated by the Western Illinois Regional Council, the Illinois Environmental Protection Agency, the City of Springfield, and the Economic Development Council for Springfield & Sangamon County. These strategy sessions were a place to discuss ideas, strategies and challenges facing the redevelopment of the former Pillsbury Mills site. These strategy sessions resulted in successful and well-attended mini-charrette and reuse strategy sessions that allowed various members of the Springfield community to vet ideas and have a frank discussion regarding the potential for the redevelopment of the former Pillsbury Mills site. While these sessions held great promise, there was no true champion to lead the redevelopment efforts of the site, and eventually, any momentum behind the project died down. This is where the Moving Pillsbury Forward group comes in. The former Pillsbury Mills site is massive, but it is manageable. The MPF group has determined that demolition must be initiated to jumpstart cleanup, remediation, and redevelopment efforts. In order to safely implement demolition plans, the known asbestos, asbestos-containing paint, and lead based paint at the former Pillsbury Mills site

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<sup>1</sup> Climate & Economic Justice Screening Tool - <https://screeningtool.geoplatform.gov/en/#12.07/39.87047/-88.91381>

<sup>2</sup> HUD LMI Mapper - <https://www.arcgis.com/apps/webappviewer/index.html?id=ffd0597e8af24f88b501b7e7f326bedd>

must be addressed. This is why MPF is seeking US EPA Brownfields Cleanup grant funding: to address the known asbestos-containing paint on four buildings on-site: B, C, D, and G.

**1.a.ii. Description of the Proposed Brownfield Site**

The former Pillsbury Mills site is located at the northeast corner of the intersection of East Phillips Street and North 15<sup>th</sup> Street on the north side of Springfield, Illinois. The sprawling 18-acre complex with rail access, 26 buildings, and 160 massive grain storage silos and structures was historically used for grain milling, manufacturing, warehousing, and offices. The area surrounding the Site consists of a large railyard to the north and east, and residential properties to the south and west. Since the closure of the facility, the site has fallen into disrepair. The former Pillsbury Mills site was developed in 1929 as a major flour processing plant operated by Pillsbury Mills. The original facility consisted of two (2) multi-story mill buildings, a warehouse, powerhouse, grain elevator/head house, and numerous grain silos. Expansions to the facility in the 1930s, 1940s, and 1950s resulted in an extensive conglomerate of 26 structures including mills, warehouses, offices, and silos. Cargill Inc. acquired the Site in 1991 and continued limited operations for 10 years until closing the plant in 2001. The Site has been vacant since that time, with successive owners (Ley Properties Management; P Mills LLC) implementing salvage operations. According to complaints filed with the Illinois Environmental Protection Agency (Illinois EPA) in 2014 and 2015 and subsequent Illinois EPA investigations, P Mills LLC completed scrapping and demolition activities without proper abatement of ACBM, resulting in an uncontrolled release of asbestos to the environment. MPF acquired the Site in early 2022 with the intent of pursuing cleanup and redevelopment. The United States Environmental Protection Agency (US EPA) completed an emergency removal action at the former Pillsbury Mills site in 2017 to address the widespread contamination resulting from the release of asbestos during illegal demolition activities. The US EPA cleanup included removal of approximately 2,200 tons of friable asbestos-containing construction debris, 1,160 cubic yards of friable asbestos-containing pipe wrap and boiler insulation, nine (9) 275-gallon totes of waste oil, three (3) 55-gallon drums of waste antifreeze, 3,700 fluorescent light bulbs, and 12 pounds of mercury to mitigate potential risk to human health or the environment. Due to the long-term history of industrial operations and the age of the remaining buildings at the Site, MPF initiated environmental assessment activities to determine the nature and extent of subsurface impacts, lead based paint, and remaining asbestos containing materials. Site characterization activities included a soil and groundwater investigation, asbestos-containing building materials inspection, and lead-based paint inspection. As discussed in the previous section, this cleanup grant is focused on the asbestos and lead based paint abatement, since subsurface impacts are limited and cannot effectively be addressed until the buildings have been demolished or extensively renovated. Asbestos and lead present a risk to human health through inhalation (asbestos) and ingestion (lead) exposure routes. MPF aspires to eliminate and prevent blight in and around the Site by facilitating redevelopment. Addressing the identified asbestos and lead based paint is a critical component to moving forward with the redevelopment strategy. The objective of asbestos and lead based paint remediation and cleanup actions is to protect human health and the environment at the Site during demolition, construction and future use.

**1.b. Revitalization of the Target Area**

**1.b.i. Reuse Strategy and Alignment with Revitalization Plans**

U.S. EPA's Technical Assistance Program provided contractor support and facilitated the involvement of Vita Nuova and GDIT in the project. Vita Nuova helped support the revitalization of this distressed community with a comprehensive reuse assessment, including zoning and funding options, demolition estimates, and concept alternatives for this complex and unique site. Vita Nuova also recognized the need to communicate with stakeholders and understand community needs and concerns; their goal was to catalyze MPF's efforts by clarifying and quantifying the constraints and opportunities for each site reuse alternative. Ultimately, Vita Nuova identified and presented three feasible reuse options to the community and project team. Gaining clarity around the demolition costs and project phasing helped MPF obtain funding for the next steps. After evaluating reuse options, Moving Pillsbury Forward is interested in an industrial reuse and is now engaged in demolition as part of their preparation for marketing the site. With committed stakeholders, active community engagement and support, and a viable option for reuse, MPF is well-positioned to facilitate the redevelopment of the former Pillsbury Mills site, while revitalizing the Springfield area, eradicating blight within the community, and fostering new avenues for growth. Moving Pillsbury Forward is currently aiming to clear the 18-acre site so that it can be redeveloped into a mixed-use property that includes a brightfield. The vision is for the south 10-12 acres to develop a 2-Megawatt solar array that produces clean energy for a light/medium industrial development on the north portion of the property. Moving Pillsbury Forward is also working with the Springfield/Sangamon Growth Alliance (SSGA) to identify the most appropriate industry. The proximity to the Mid-State Medical

District makes the property attractive in supporting Springfield’s growing healthcare industry. A development of this kind fits nicely within the long-range comprehensive plan for Springfield. MPF’s reuse strategy for the former Pillsbury Mills site also aligns directly with the four primary goals of the City of Springfield’s Comprehensive Plan 2017-2037: a more attractive community, a better connected city, a growing city, and a heritage city. The former Pillsbury Mills site is an enormous eyesore and symbol of the rust belt era of Springfield that is far from attractive. Currently, the former Pillsbury Mills site has limited connection with the City and is a major hindrance for growth for a large area of Springfield. Once the revitalization plans are underway, the site will open up this end of the North Grand Avenue in Springfield, better connecting the city. Redevelopment plans for the site will honor the manufacturing heritage of Springfield and project region with details like refurbishing the water tank from the Pillsbury site, while moving the space forward to a more productive end use.

**1.b.ii. Outcomes and Benefits of Reuse Strategy**

Since it’s closing 20 years ago, the 18-acre former Pillsbury site has been abandoned, is partially demolished, and has become a significant challenge for the surrounding neighborhood and greater Springfield area. The property has faced significant legal entanglements and is known to be contaminated with asbestos and lead paint, which has stalled the future redevelopment of the site. The Pillsbury site’s surrounding neighborhoods are among the most severely impoverished in Springfield. Removal of the existing structures and redevelopment of the site into a productive end-use will provide the area with significantly greater public safety, health, environmental health, social justice, and economic development benefits. The remediation plans, once implemented, will also be incredibly impactful to the community. The proposed project will have the capacity to create hundreds of jobs – this includes temporary jobs for demolition and construction, as well as future jobs created when the facility is full redeveloped.

**1.c. Strategy for Leveraging Resources**

**1.c.i. Resources Needed for Site Characterization**

To date, MPF has raised over \$100,000 in private financing to advance the remediation and redevelopment of the former Pillsbury Mills site. A portion of that funding (\$18K) was provided through a grant from the Community Foundation for the Land of Lincoln. That grant paid for a Phase I ESA prior to MPF taking acquisition of the Pillsbury site. In April of 2022, a Congressionally Directed Spending request was applied for through Senator Durbin’s Office. That \$2,000,000 request has advanced through the Senate Appropriations Committee and awaits final passage in the congressional budget process will take place in the coming weeks. In July of 2022, MPF applied to USEPA Region V for technical assistance through the Technical Assistance Services for Communities (TASC) program. That assistance was awarded in October of 2022. If the proposed cleanup site needs additional assessment work, MPF will work with its community partners for the opportunity to utilize their additional funds to complete any additional assessment work. If necessary, MPF will work with the City of Springfield, and the Springfield and Sangamon County Growth Alliance to access TIF or Enterprise Zone funds if they are eligible, and finally, MPF can work with the site developers to ensure that any additional assessment work needed will be financed.

**1.c.ii. Resources Needed for Site Remediation**

The Pillsbury project is a large-scale demolition and redevelopment plan for a significantly blighted, former industrial property in the Pillsbury Neighborhood of Springfield, Illinois. The 18-acre site has been abandoned for several years, is partially demolished, and has become a significant challenge for the surrounding neighborhood and greater Springfield area. MPF has secured acquisition of the site and is now coordinating the remediation, demolition, and redevelopment of the site for the benefit of the neighborhood and our city. As the site is cleaned-up and redeveloped, five areas of community benefit have been identified: public safety, health, social justice, economic development, and environmental safety. A community centered collaborative is the most inclusive process and effective means to generate sustainable improvement in the health, safety, and prosperity of a neighborhood and its residents. The Pillsbury project is anticipated to take five years to complete and will cost millions of dollars in total. MPF is already in the process of seeking funding assistance from state and federal agencies including US EPA Brownfields Program, IEPA Municipal Brownfields Program, Illinois Department of Commerce & Economic Opportunity (DCEO) through the Rebuild Illinois program, US EDA, and HUD. MPF will also tap into local Springfield resources like TIF financing, Enterprise Zone benefits, Special Service Area benefits, Opportunity Zone benefits, and CDBG funding. \$9.1M needed for demolition. To date, \$6.1M has been obtained.

**1.c.iii. Resources Needed for Site Reuse**

As mentioned above, the massive 18-acre site will take years and millions of dollars to move the site towards its reuse strategy. Once site remediation is complete, MPF will tap into the following resources to help prepare the site for its future redevelopment: Springfield CDBG funding, US EDA Public Infrastructure funding, TIF district financing, Enterprise Zone and Opportunity Zone credits, New Market Credits, private investment dollars, local lending dollars, and project donation dollars.

**1.c.iv. Use of Existing Infrastructure**

The planned reuse/redevelopment plans for the cleanup site will primarily utilize existing infrastructure – this includes adaptive reuse plans for utilizing existing building structures on-site for redevelopment, parking lots/facilities, site access roads, local roads, sidewalks, curb and gutters, water, sewer, gas, and electricity infrastructure. The former Pillsbury site is massive enough that, if divided, new infrastructure may be needed to serve the redevelopment. In this case, the existing infrastructure may need to be extended from the City’s right-of-way, and MPF will work with the City of Springfield in those instances. MPF’s redevelopment priority is on infrastructure reuse, but will work with developers when new infrastructure is required. New infrastructure may be required for broadband capabilities or any energy efficiency installations like solar power, as they do not currently exist at the site.

**2: COMMUNITY NEED AND COMMUNITY ENGAGEMENT:**

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**2.a. Community Need**

**2.a.i. The Community’s Need for Funding**

Moving Pillsbury Forward does not have the financial resources to complete the proposed site remediation work described herein for the former Pillsbury Mills site without financial assistance. Moving Pillsbury Forward, (MPF) formed as a registered not-for-profit corporation in October 2020 after beginning as a community working group in November 2019 to study the Pillsbury site’s public safety and known environmental issues and develop recommendations for long-term solutions. After a year of study and collaboration with community stakeholders and elected officials, formation of a not-for-profit presented the most viable path for achieving a workable and successful long-term redevelopment solution for the community. MPF’s purpose is to facilitate community redevelopment to successfully eliminate and prevent blight in and around the former Pillsbury Mills site at 1525 E. Phillips Ave. in Springfield, Illinois. While MPF is leading the redevelopment efforts, they are a not-for-profit entity and cannot finance the remediation and redevelopment efforts on their own.

The former Pillsbury site’s surrounding neighborhoods are among the most severely impoverished in Springfield. The Median Household Income is approximately \$25,000, which is 65% lower than the State of Illinois’s Median Household Income at \$72,205. The Poverty Rate in the site’s project area is a staggering 49%. Per HUD’s LMI mapping tool, the Census Tract has a low-to-moderate income population of 94.21%. The Median Home Value in this area is \$50,000, which is 76% lower than the Median Home Value of the State of Illinois. The Median Age of the Target Area is 22.59 years old, illustrating a vast threat to the health and safety of some of the most sensitive populations of women, children, and women of child-bearing age in the neighborhood. The location of the former Pillsbury Mills site is in a Designated Low Income Community and Designated Opportunity Zone areas. To have these designations, the site location generally represents economically distressed communities that are in need of investment and revitalization.

Removal of the existing structures and redevelopment of the site into a productive end-use will provide the area with significantly greater public safety, health, environmental health, social justice, and economic development benefits. The proposed project and the Moving Pillsbury Forward group have garnered significant community and public/private agency support, illustrating the desire by the immediate neighborhood and community to address the site. MPF has partnered with the City of Springfield, Sangamon County, and the Springfield Sangamon Growth Alliance (SSGA) in redevelopment to keep the public agencies involved. Community support for the project includes the following: Faith Coalition for the Common Good, Illinois Chapter Sierra Club Sangamon Valley Group, Pillsbury Mills Neighborhood Association, Springfield Chapter ACLU, Springfield Inner City Older Neighborhoods (ICON), Southern Illinois University (SIU) School of Medicine, and Springfield Black Chamber of Commerce.

**2.a.ii. Threats to Sensitive Populations**

**(1) Health or Welfare of Sensitive Populations**

Moving Pillsbury Forward has identified the sensitive populations that are being disproportionately affected by the former Pillsbury Mills brownfields site. They include minorities, children, persons living in poverty, and women of child bearing age. Within the Target Area, US Census data shows

that 61% of the population is comprised of minorities, compared to 27.74% citywide. The Median Age of the Target area is 22.9 years old, illustrating a vast threat to the health and safety of the population of women, children, and women of child-bearing age in the neighborhood. Furthermore, more than 45% of the female population in the Target Area is comprised of women of child bearing age. 86% to 97% of the population in the Target Area live below the poverty level. By remediating the environmental contamination issues at the project site with these grant funds, any threat of exposure by nearby sensitive populations to contaminants via direct contact, inhalation, vapor intrusion or ingestion will be reduced or eliminated.

## **(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions**

A review of the Climate & Economic Justice Screening tool shows a number of cumulative environmental issues present in the Target Area that illustrate a greater than normal incidence of disease and adverse health conditions. Per the tool, Census Tract 8 has the following health conditions and percentiles: Asthma – 97<sup>th</sup> percentile, Diabetes – 90<sup>th</sup> percentile, Heart Disease – 76<sup>th</sup> percentile, and a Low Life Expectancy in 92<sup>nd</sup> percentile<sup>3</sup>. Census Tract 7 has the following health conditions and percentiles: Asthma – 79<sup>th</sup> percentile, Diabetes – 69<sup>th</sup> percentile, Heart Disease – 81<sup>st</sup> percentile, and Low Life Expectancy in the 92<sup>nd</sup> percentile. In Census Tract 7, the threat of lead paint is apparent in 91% of the houses and buildings – this information is vital since remediating lead based paint is part of the cleanup plan for the former Pillsbury Mills site. By remediating the environmental contamination issues at the project site with these grant funds and pushing the former Pillsbury site to a more productive end use, the disadvantaged community directly affected in the neighborhood will be the beneficiaries of positive impacts of brownfields redevelopment. This includes blight removal, economic rejuvenation in the neighborhood, and the more development interest in the Target Area.

## **(3) Environmental Justice**

### **(a) Identification of Environmental Justice Issues**

The Climate & Economic Justice Screening Tool showed some dire statistics for the Target Area Census Tracts. Census Tract 8 features the following<sup>4</sup>:

- Census Tract 8 is designated as a Disadvantaged Area
- the Energy Burden on the residents in the Census Tract is in the 95<sup>th</sup> percentile
- the Census Tract has a Low-Income percentile of 98, which means that household incomes in the area are equal to or twice the federal poverty level
- the Higher Education Non-Enrollment is in the 95<sup>th</sup> percentile – this is the percentage of the Census Tract’s population aged 15 or older that is not enrolled in college or graduate school
- the Housing Cost Burden is in the 96<sup>th</sup> percentile – low income household are spending more than 30% of their income on housing
- houses with lead paint in the Census Tract is in the 91<sup>st</sup> percentile
- Unemployment in the Census Tract is in the 87<sup>th</sup> percentile
- Poverty in the Census Tract is in the 97<sup>th</sup> percentile
- 25% of people ages 25+ have an education level that is less than a High School Diploma

Census Tract 7 features the following<sup>5</sup>:

- Census Tract 7 is designated as a Disadvantaged Area
- the Census Tract has a Low-Income percentile of 79, which means that household incomes in the area are equal to or twice the federal poverty level
- the Higher Education Non-Enrollment is in the 95<sup>th</sup> percentile – this is the percentage of the Census Tract’s population aged 15 or older that is not enrolled in college or graduate school
- houses with lead paint in the Census Tract is in the 91<sup>st</sup> percentile
- Unemployment in the Census Tract is in the 87<sup>th</sup> percentile
- Poverty in the Census Tract is in the 86<sup>th</sup> percentile
- 19% of people ages 25+ have an education level that is less than a High School Diploma

### **(b) Advancing Environmental Justice**

The former Pillsbury site’s surrounding neighborhoods are among the most severely impoverished in Springfield. The Pillsbury cleanup efforts are directly confronting the problem that impoverished communities are more likely to suffer from a lack of clean water and air and a lack of safe housing. These conditions are often the direct result of industrial facilities’ frequent proximity to low-income

<sup>3</sup> Climate & Economic Justice Screening Tool - <https://screeningtool.geoplatform.gov/en/#11.96/42.30421/-89.59492>

<sup>4</sup> Climate & Economic Justice Screening Tool - <https://screeningtool.geoplatform.gov/en/#12.07/39.87047/-88.91381>

<sup>5</sup> Climate & Economic Justice Screening Tool - <https://screeningtool.geoplatform.gov/en/#12.07/39.87047/-88.91381>



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neighborhoods. Removal of the existing structures and redevelopment of the site into a productive end-use will provide the area with significantly greater public safety, health, environmental health, social justice, and economic development benefits. Due to these statistics above, throughout their remediation efforts, the Moving Pillsbury Forward team will work to educate stakeholders on the importance of integrating principles of environmental justice and equitable development into the cleanup and redevelopment of the cleanup site, including: ensuring equitable access to amenities such as health clinics and grocery stores, working with minority- and women-owned businesses, ensuring jobs with living wages, partnering with community-based organizations and neighborhood leaders to enhance the understanding of environmental and health-related issues at the community level, creating commercial linkage strategies, and reusing brownfield sites for greenspace and other healthy, safe and walkable areas for the cleanup site. Moving Pillsbury Forward will also work to provide accessible and culturally appropriate opportunities for low-income, minority and linguistically isolated stakeholders to meaningfully participate in decision-making processes on the proposed brownfield cleanup. These principles help to ensure that low-income and minority residents in the project area, which has historically consisted of blighted properties and perceived or known environmental contamination, reap the benefits of this environmental cleanup project.

**2.b. Community Engagement**

**2.b.i. Project Involvement and 2.b.ii. Project Roles**

<b>Name of Organization</b>	<b>Point of Contact (name, phone, email)</b>	<b>Specific Role in the Project or Assistance Provided to the Project</b>
<b>Pillsbury Neighborhood Association</b>	Contact: John Keller, President Email: None Phone: 217-381-3497	Facilitates and coordinates local neighborhood communications and activities with MPF. The Pillsbury Neighborhood Association meets monthly, and members support MPF through active volunteering. Neighbors mow and maintain the Pillsbury site throughout the summer months. Neighbors also provide perimeter security checks of the Pillsbury site. Reports are made to MPF weekly.
<b>Springfield Police Department</b>	Contact: Sargent Matt Doss Email: <a href="mailto:james.doss@springfield.il.us">james.doss@springfield.il.us</a>	Supervisor of Neighborhood Policing Officer (NPO) program for the Springfield Police Department. Coordinates with MPF on strategies for safety and security at the Pillsbury site. Trespassing and metal theft are continuing challenges.
<b>SIU School of Medicine</b>	Contact: Hope Cherry, Instructor, Dept. of Family & Community Medicine Email: <a href="mailto:hcherry@siumed.edu">hcherry@siumed.edu</a>	Coordinates annual spring Day of Service at SIU-Med School. MPF and the Med School have an ongoing partnership that focuses on community health in the Pillsbury Neighborhood. MPF will host our third spring cleanup in the Pillsbury Neighborhood with support from 100 SIU Med School student volunteers on May 5, 2023.
<b>NAACP</b>	Contact: James Johnson, Chair of Springfield Chapter NAACP Environmental Justice Committee Email: [REDACTED]	Coordinates communications, presentations, and periodic Pillsbury Neighborhood actions, with MPF and the local NAACP Chapter. Provides monthly Pillsbury Project updates at NAACP Chapter meetings. The Pillsbury site is in a high minority neighborhood and has a history of environmental justice concerns.
<b>Springfield Inner City Older Neighborhoods</b>	Contact: Mark Mahoney President of ICON Email: <a href="mailto:chair@springfieldicon.org">chair@springfieldicon.org</a>	ICON is a community-based group that meets monthly and includes the Pillsbury Neighborhood as one of ten neighborhoods. It is an advocacy organization. ICON hosts the MPF website and has partnered with MPF for over 3 years. Pillsbury Project activities are reported with regularity at ICON monthly meetings.
<b>Springfield Sangamon Growth Alliance</b>	Contact: Ryan McCrady, Executive Director Email: <a href="mailto:rmccrady@thriveinspi.org">rmccrady@thriveinspi.org</a>	Economic development for the Greater Springfield Area is the focus for SSGA. The SSGA has partnered with MPF in funding various aspects of the Pillsbury Project. This includes over \$200,000 for the Phase II ESA conducted in 2022 at the Pillsbury site.
<b>Sierra Club, Sangamon Valley Group</b>	Contact: Nick Dodson, President Phone: 217.622.9609 Email: [REDACTED]	The Sierra Club, Sangamon Valley Group, focuses on ground water violations and coal ash contamination in the City. SVG activates grassroots groups to pressure elected officials to transition from coal to solar energy. SVG assists MPF with community involvement to advance remediation and a creative solar re-use for the Pillsbury site..



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<b>Faith Coalition for the Common Good</b>	Contact: Tyshianna Bankhead, Executive Director Email: <a href="mailto:Fccg2208@gmail.com">Fccg2208@gmail.com</a>	The Faith Coalition for the Common Good works tirelessly in Springfield for racial and economic equity. They work with MPF walking notifications in the Pillsbury plant area, plus, attend MPF’s community meetings. They volunteer for Pillsbury neighborhood clean ups. They will also monitor prevailing wage compliance on the Pillsbury site
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**2.b.iii. Incorporating Community Input**

Moving Pillsbury Forward is committed to increasing citizen involvement in plans for the remediation and redevelopment of the Pillsbury Mills property. The organization continues to hold informational meetings at public venues, and actively seeks volunteers who assist with mowing and cleaning up brush, small trees and litter at the site. Moving Pillsbury Forward also offers guided tours of the facility. Moving Pillsbury Forward has been incredibly transparent with their goals and role in the redevelopment of the former Pillsbury Mill site. In those efforts, MPF have also been very active in communicating with the public. Whether it’s through their website, community meetings, neighborhood cleanups, radio and television interviews, information featured on their own YouTube Channel, or a feature on PBS’ Illinois Stories program, MPF has been adamant about seeking community input and support for the redevelopment of the former Pillsbury Mills site. A breakdown of their community input efforts and activity just from 2023 listed below:

- **Hosted Public Tours:** Thousands of people have toured the Pillsbury Site grounds to date;
- **Hosted Community Meetings:** Several Community Meetings have been held to keep the public informed and engaged in this vital project. The results of the Phase II Environmental Site Assessment were presented at a Community Meeting;
- **Pillsbury Employee Gathering:** a Pillsbury Employee Gathering was held on April 29, 2023, and 34 retired employees attended and participated in the public tours;
- **Volunteer Opportunities:** MPF seeks volunteers for research, exhibits, oral history projects, tour guides, and site maintenance work activities;
- **Echoes of Pillsbury Event:** held on September 21, 2023, Echoes of Pillsbury was a very special evening of history, art, and storytelling. For the past six months, Moving Pillsbury Forward has been working with archaeologist and artist Robert Mazrin to record, salvage, and recycle not only historic artifacts from the abandoned Pillsbury factory, but also a remarkable range of relics and “ready-made” art objects. Arranged and displayed on-site, this special exhibit was open to the public

As MPF moves forward with the proposed site cleanup, they will hold three (4) public meetings and develop three (4) fact sheets on the status of cleanup activities at important junctures. MPF will post these fact sheets on their website and utilize any necessary social media to notify the public with a link to the MPF website. If MPF is awarded this grant, they will continue with the utilization of diverse notification methods (i.e. social media, website, postings) to ensure that they reach a broad audience. It will also be a priority for MPF to describe the cleanup activities, and progress in ways that are easily understood by its residents, who will most likely be unfamiliar with environmental and scientific terminology. In addition, MPF will seek out translation services for any households directly impacted by any remediation-related work

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS:**

**3.a. Proposed Cleanup Plan**

The proposed cleanup plan is based on the Analysis of Brownfield Cleanup Alternatives (ABCA) prepared for activities associated with the remediation of the Former Pillsbury Mills Plant located at 1525 East Phillips Street in Springfield, Illinois. The tasks and activities described below are eligible uses of funds and are specifically designed to be effectively completed within the four-year period of performance. The proposed cleanup plan is as follows:

Cleanup of the asbestos-containing silver exterior paint on Buildings B, C, D & G. Site preparation and removal of materials will be required to accomplish the remediation operation for each building location. On site air monitoring and collection of confirmation samples from remediated areas to verify successful asbestos cleanup will also be conducted. Moving Pillsbury Forward received a previous cleanup grant to address asbestos and lead based paint within the footprint of buildings known as V, X, W, K, L, R, S, T, M, H, I, F, E, and A, all located within the former Pillsbury Plant facility.

**3.b. Description of Tasks/Activities and Outputs**

<b>Task 1: Program Management</b>
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<p><b>i. Project Implementation:</b> This task includes oversight of the Moving Pillsbury Forward (MPF) Cooperative Agreement with US EPA for this project, ensuring compliance with the Agreement, Work Plan, Schedule, and EPA’s regulations. This task also includes the preparation/submittal of Quarterly and Annual Reports, MBE/WBE reporting, entering information in the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database for the project, procurement of a Qualified Environmental Professional to lead the project, management of the federal grant funds for the project, MPF staff attendance at a US EPA Brownfields Conference, and final project closeout with EPA.</p>
<p><b>ii. Anticipated Schedule:</b> This task will start immediately upon project award and will be ongoing continuously throughout the entire four-year project period. The Work Plan and Cooperative Agreement oversight will start on day of the grant’s project period. MPF will move forward with the procurement of a Qualified Environmental Professional in the first Quarter of the grant. Quarterly Reports will be submitted in their corresponding quarters, starting with Q1 in October of 2025. The Annual Reports will be submitted annually, with the first due in September of 2026.</p>
<p><b>iii. Task/Activity Lead:</b> This task will be led by MPF Board President, Chris Richmond.</p>
<p><b>iv. Outputs:</b> Executed Cooperative Agreement, Contract with Qualified Environmental Professional, 16 Quarterly Reports, 4 Annual Reports, 4 MBE/WBE Reports, Quarterly Updates to ACRES, attendance of Moving Pillsbury Forward Staff at a National Brownfields Conference, and final closeout documentation to US EPA</p>

<p><b>Task 2: Community Involvement</b></p>
<p><b>i. Project Implementation:</b> This task includes cooperation between the MPF staff, Qualified Environmental Professional (QEP), and Project Partners to implement the community involvement plan to inform residents, property owners, and the public about the status of the remediation project. This task also includes website updates and printed public information materials as needed. Public comments, questions, and concerns will be tracked and addressed under this task.</p>
<p><b>ii. Anticipated Schedule:</b> This task will commence immediately upon project award and will continue throughout the entire four-year project period, following the community involvement plan described in this grant application.</p>
<p><b>iii. Task/Activity Lead:</b> This task will be led by MPF Board President, Chris Richmond with assistance from the selected Qualified Environmental Professional and Project Partners.</p>
<p><b>iv. Outputs:</b> 4 Public Meetings and Meeting Minutes, 4 Website Updates, 4 Fact Sheets</p>

<p><b>Task 3: Cleanup Planning</b></p>
<p><b>i. Project Implementation:</b> Prior to site remediation work, the Qualified Environmental Professional will prepare a site-specific work plan including the Health &amp; Safety Plan, Quality Assurance Project Plan, finalize the ABCA, and coordinate with MPF and development professionals to finalize the Cleanup Plan, including selective demolition planning to commence with remediation. MPF, with assistance from a QEP, will secure all necessary permits and prepare bid documents to select a competitive, qualification-based Cleanup Contractor in compliance with federal, state, and local procurement requirements.</p>
<p><b>ii. Anticipated Schedule:</b> This task will commence after MPF selects a Qualified Environmental Professional, approximately 90 days after cooperative agreement award, and will continue through the rest of the four-year project period.</p>
<p><b>iii. Task/Activity Lead:</b> This task will be led by the Qualified Environmental Professional.</p>
<p><b>iv. Outputs:</b> Health &amp; Safety Plan, Quality Assurance Project Plan, finalize the ABCA Decision Document, Plans &amp; Specs, Permits, and selection of Cleanup Contractor to perform site preparation and remediation activities at the project site, and contract documents for the QEP</p>

<p><b>Task 4: Cleanup Activities</b></p>
<p><b>i. Project Implementation:</b> This task includes the cleanup work, including: Cleanup of the asbestos-containing silver exterior paint on Buildings B, C, D &amp; G. Site preparation and removal of materials will be required to accomplish the remediation operation for each building location. On site air monitoring and collection of confirmation samples from remediated areas to verify successful asbestos cleanup will also be conducted.</p>
<p><b>ii. Anticipated Schedule:</b> This task will commence after the first year in the project period and will continue until project closeout.</p>
<p><b>iii. Task/Activity Lead:</b> This task will be led by the Qualified Environmental Professional.</p>
<p><b>iv. Outputs:</b> Pre-Construction Meeting/Minutes, site preparation, asbestos abatement, confirmation air with remediation and sampling, lab reports, a final cleanup report including 4</p>



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buildings with asbestos-containing paint remediated, and Reuse and Development Plans established for site.
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**3.c. Cost Estimates**

Budget Categories		Project Tasks				TOTAL
		Task 1: Program Management	Task 2: Community Involvement	Task 3: Cleanup Planning	Task 4: Cleanup Activities	
Direct Costs	Personnel					
	Fringe Benefits					
	Travel	\$3,250				\$3,250
	Equipment					
	Supplies					
	Construction				\$2,500,000	\$2,500,000
	Contractual	\$10,800	\$6,750	\$27,000	\$104,500	\$149,050
	Other					
<b>Total Direct Costs</b>		<b>\$14,050</b>	<b>\$6,750</b>	<b>\$27,000</b>	<b>\$2,604,500</b>	<b>\$2,652,300</b>
<b>Total Federal Funding</b>		<b>\$14,050</b>	<b>\$6,750</b>	<b>\$27,000</b>	<b>\$2,604,500</b>	<b>\$2,652,300</b>
<b>Total Budget</b>		<b>\$14,050</b>	<b>\$6,750</b>	<b>\$27,000</b>	<b>\$2,604,500</b>	<b>\$2,652,300</b>

**Task 1:** This budget includes \$10,800 of Contractual work time at a blended \$135/hour rate, which will provide approximately 80 hours of QEP time, for bid preparation and cooperative agreement management activities. The remaining \$3,250 is for two (2) MPF Staff to attend the National Brownfield Conference (Airfare at \$800 each, Lodging at \$175 per day for 3 days each (\$1050), Meals \$100 per person for 3 days each (\$600).

**Task 2:** This budget includes \$6,750 of QEP time to help the MPF volunteer group in the development of Fact Sheets, Website updates, and conducting Public Meetings. Contractual work is for support of community meetings and public engagement (50 hours of Qualified Environmental Professional at \$135/hour blended rate x 50 hours = \$6,750).

**Task 3:** The \$27,000 Cleanup Planning Budget will be for the development of the HASP, QAPP, finalization of the ABCA, Plans & Specs and permitting for the project, and assistance with bidding. At a blended \$135/hour, this will provide 200 hours of QEP consultant time for this task.

**Task 4:** The \$2,500,000 Construction Budget will be for mobilization and site preparation, asbestos cleanup, and demobilization. QEP oversight and air monitoring during remediation at a blended \$100/hr for 4 months (800 hours) = \$80,000, 16 weeks of hotel and meals for QEP (80 days of hotel at \$150/night (\$12,000), and 80 days of meals at \$55/day for meals (\$4,400) totaling \$16,400. The amount of time for the remediation is subject to the procured cleanup contractor availability and selective demolition for remediation but is expected to be completed within 4 months during the first year of the grant. Subsequent confirmation sampling and final reporting to follow and will require a blended rate of \$135/hr for 60 hours \$8,100 to provide a final report. Total Contractual costs under this task will be \$104,500.

**3.d. Plan to Measure and Evaluate Environmental Progress and Results**

To ensure that MPF achieves the intended results of the Cleanup Grant and completes the outputs of each task listed above, MPF will carefully track, measure, and report project performance through annual reports, quarterly reports, ACRES reporting, and with the implementation of MPF’s Community Involvement Plan. Quarterly and Annual Reports will cover project progress, any difficulties encountered, a record of financial expenditures, data results, and anticipated further actions. Specific accomplishments, contaminants found, which materials were impacted, and resources required to leverage and complete the planned reuse will all be reported on, and will be posted to the MPF website to keep their community involved on the status of the project. This site will be entered into the ACRES database, which will also be utilized to track job creation and acres of land assessed as part of this grant project. Anticipated quantifiable outcomes from this project include the number of acres of land remediated and the square footage of abatement completed, while other outcomes include liability protection for the site owner, removal of blight, reduction or elimination of future contaminant exposure, improving community health, and the return of the site to a productive mixed use. Periodic meetings with the QEP and the Cleanup Contractor will take place to ensure deadlines and milestones are being met - corrective actions like liquidated damages will go into effect if the project deadlines and milestones are not being met.

**TASK 4: PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:**

**4.a. Programmatic Capability**

**4.a.i. Organizational Structure**

MPF is led by a Board that stands ready to administer and manage brownfield cleanup grant funds when they are awarded. MPF has the ability and capacity to manage this grant. MPF has been awarded

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a previous Brownfields grant, and the Board has extensive experience facilitating and managing redevelopment projects and will utilize that experience to support the most strategic use of the grant funds. If awarded this funding, MPF will effectively manage the grant and successfully perform each phase of work on the project. Board President Chris Richmond will serve as MPF's Project Manager for this project, serving as the primary contact and responsible for submitting quarterly reports, financial reports, progress reports, and the final summary report to EPA Region 5 Staff with the assistance of the selected qualified environmental consultant for the project. Upon award of the cooperative agreement, MPF will prepare a draft Work Plan. After the US EPA approves the work plan, MPF will retain the Qualified Environmental Professional (QEP) in compliance with all applicable federal and local procurement requirements. The QEP will assist with grant and program management and will conduct cleanup planning, cleanup activities and participate in project reporting and community engagement activities. MPF will work with IEPA to provide independent oversight of cleanup activities conducted under this program, to ensure all cleanup and remediation is conducted appropriately and with consideration for public health and welfare.

**4.a.ii. Description of Key Staff**

Mr. J. Chris Richmond, the Board President of Moving Pillsbury Forward, will serve as Project Manager. Mr. Richmond is a retired Springfield Fire Chief and has been involved in the implementation and administration of grants throughout that time, including the previous federally funded grants. He wholeheartedly understands the importance of grant administration and timely recordkeeping. MPF's plan for management continuity in the event of any personnel change relies on an experienced and readily available Project Manager on staff. Mr. Richmond will be assisted by Polly Poskin, Board Vice President, and Tony DelGiorno, Board Secretary/Treasurer – they will both play vital roles in the management and reporting, particularly mapping and GIS work, of MPF's brownfields cleanup grant. Moving Pillsbury Forward Board members have significant experience with State and Federal grant writing and management. Chris Richmond, Board President, retired as Springfield City Fire Marshal in 2019 and managed the grant program for the fire department for 5 years. He wrote several successful FEMA grants during this period. Polly Poskin, Board Vice-President, has extensive experience in State grant oversight and management from her career as Executive Director of Illinois Coalition Against Sexual Assault (ICASA). Tony DelGiorno, Board Secretary and Legal Counsel, is an attorney in private practice entering his 12th year on the Sangamon County Board and has extensive experience with federal grant and loan programs through the USDA Rural Development Office representing rural water utility cooperatives. MPF has received, and successfully managed, a grant from the Community Foundation for the Land of Lincoln. That grant was utilized to conduct a Phase I ESA of the property and prepared for the transfer of the former Pillsbury property into ownership by Moving Pillsbury Forward.

**4.a.iii. Acquiring Additional Resources**

MPF will identify, coordinate and leverage any public and private resources needed to complete the described grant tasks. MPF will follow EPA's procurement policies to hire a Qualified Environmental Professional (QEP) to effectively and efficiently assist MPF in managing the Assessment grant project. The QEP will assist MPF in preparing bid documents needed to select a contractor to conduct the cleanup work, and manage the remediation project as it commences. All procurement will follow federal procurement regulations and any other additional requirements needed for procurement under an EPA Cooperative Agreement. MPF, as a not-for-profit organization, has the ability to procure services/contractors that meets the Federal procurement requirements. MPF will work with its Project Partners to develop a management plan for taking over the grant project if any person serving the major roles were to leave the project.

**4.b. Past Performance and Accomplishments**

**4.b.i. Currently Has or Previously Received an EPA Brownfields Grant**

**1) Accomplishments:** Moving Pillsbury Forward is currently in their first year of their US EPA Brownfields Cleanup Grant Award, and have completed the following to date: obtained an approved Work Plan, completed all required federal forms, and are currently working through the federal procurement process to obtain a Qualified Environmental Professional to oversee the project.

**2) Compliance with Grant Requirements:** While the MPF is in their first year of their current Cleanup Grant, the Board is proving that they are more than capable of managing these Brownfield Cleanup grant funds. MPF's Board has worked extensively with federal funding, making MPF very aware of the programmatic requirements involved in successfully managing a Brownfields grant. MPF will strictly adhere to the workplan and comply with the schedule, terms & conditions, and reporting requirements which include quarterly reports, federal financial reports, ACRES, DBE reports, and where appropriate, HASP and QAPP, and finalizing the Analysis of Brownfield Cleanup Alternative (ABCA) report.

## **THRESHOLD CRITERIA:**

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### **1. Applicant Eligibility:**

Moving Pillsbury Forward NFP is a 501(c)(3) None For Profit organization that was developed with the sole purpose of cleaning up and repurposing the former Pillsbury plant site. MPF NFP has authority to enter into a cooperative agreement for a Cleanup Grant with the United States Environmental Protection Agency as a non-for-profit entity.

### **2. Previously Awarded Cleanup Grants:**

The proposed cleanup site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

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

Moving Pillsbury Forward was not a recipient of any previous or existing Multipurpose Grant Funds.

### **4. Site Ownership:**

Moving Pillsbury Forward NFP is the sole owner of the proposed cleanup grant site.

### **5. Basic Site Information:**

- (a) Site name: Former Pillsbury Plant, Buildings B/C/D/G
- (b) Address: 1525 E. Phillips Avenue, Springfield, IL, 62702
- (c) Current Owner: Moving Pillsbury Forward NFP

### **6. Status & History of Contamination at the Site:**

**(a) Contamination:** The former Pillsbury Mills site is located at the northeast corner of the intersection of East Phillips Street and North 15<sup>th</sup> Street on the north side of Springfield, Illinois, and is comprised of approximately 18 acres of land developed with numerous grain silos and structures historically used for grain milling, manufacturing, warehousing, and offices. The area surrounding the Site consists of a large railyard to the north and east, and residential properties to the south and west. Since the closure of the facility in 2001, the Site has fallen into disrepair.

According to complaints filed with the Illinois Environmental Protection Agency (Illinois EPA) in 2014 and 2015 and subsequent Illinois EPA investigations, P Mills LLC completed scrapping and demolition activities without proper abatement of ACMF, resulting in an uncontrolled release of asbestos to the environment. MPF acquired the Site in early 2022 with the intent of pursuing cleanup and redevelopment. The United States Environmental Protection Agency (US EPA) completed an emergency removal action at the former Pillsbury Mills site in 2017 to address the widespread contamination resulting from the release of asbestos during illegal demolition activities. The US EPA cleanup included removal of approximately 2,200 tons of friable asbestos-containing construction debris, 1,160 cubic yards of friable asbestos-containing pipe wrap and boiler insulation,

nine (9) 275-gallon totes of waste oil, three (3) 55-gallon drums of waste antifreeze, 3,700 fluorescent light bulbs, and 12 pounds of mercury to mitigate potential risk to human health or the environment.

The former Pillsbury Plant site is comprised of 160 grain silos, a head house and grain dryer encompassing approximately 3.6 acres. The Site was historically operated for large-scale grain milling, manufacturing, and warehousing operations from approximately 1929 to 2001. Several of the facility buildings have been demolished since the time of the facility operations; however, a conglomerate of interconnecting structures and numerous grain silos are still present. A Site Layout Map depicting the approximate Site boundary is included as Figure 2. For this grant the grain silos and headhouse buildings are the subject of this effort. These structures are painted with a silver paint that contains asbestos that needs to be remediated.

The silos and headhouse were evaluated for the presence of asbestos-containing building materials (ACBMs) and lead-based paint (LBP) in conjunction with Phase I and Phase II Environmental Site Assessments completed on behalf of MPF in 2022. Asbestos was found in the exterior silver paint.

MPF has been created to promote cleanup and redevelopment of the former Pillsbury plant to provide economic opportunity, public safety, and environmental justice for the impoverished area surrounding the Site. Based on the findings of environmental assessments, redevelopment of the Site will include mitigation of ACBM to protect human health and the environment. This ABCA is provided to outline the alternatives evaluated during the cleanup planning process for the portion of the former Pillsbury Mill with the silos and headhouse.

**(b) Operational History & Current Use of Site:** The former Pillsbury Mills site was developed in 1929 as a major flour processing plant operated by Pillsbury Mills. The original facility consisted of two (2) multi-story mill buildings, a warehouse, powerhouse, grain elevator/head house, and numerous grain silos. Expansions to the facility in the 1930s, 1940s, and 1950s resulted in an extensive conglomerate of 26 structures including mills, warehouses, offices, and silos. Cargill Inc. acquired the Site in 1991 and continued limited operations for 10 years until closing the plant in 2001. The Site has been vacant since that time, with successive owners (Ley Properties Management; P Mills LLC) implementing salvage operations.

**(c) Environmental Concerns:** Due to the long-term history of industrial operations and the age of the remaining buildings at the Site, MPF initiated environmental assessment



activities to determine the nature and extent of subsurface impacts, lead based paint, and remaining asbestos containing materials. Site characterization activities included a soil and groundwater investigation, asbestos-containing building materials inspection, and lead-based paint inspection. In addition, there are significant concerns regarding the asbestos and lead based paint abatement, since subsurface impacts are limited and cannot effectively be addressed until the buildings have been demolished or extensively renovated. Asbestos and lead present a risk to human health through inhalation (asbestos) and ingestion (lead) exposure routes.

**(d) Source of Contamination and Nature and Extent of Contamination:** Due to the long-term history of industrial operations and the age of the remaining buildings at the Site, MPF initiated environmental assessment activities to determine the nature and extent of subsurface impacts, LBP, and remaining ACBM. Site characterization activities included a soil and groundwater investigation, asbestos-containing building materials inspection, and lead-based paint inspection. However, this ABCA is focused on ACBM, since subsurface impacts are limited and cannot effectively be addressed until the buildings have been demolished or extensively renovated. Asbestos presents a risk to human health through inhalation (asbestos) exposure route.

**7. Brownfields Site Definition:** The former Pillsbury Plant site meet the definition of a brownfield. This site is (a) Not listed or proposed for listing on the National Priorities List; (b) Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; (c) Not subject to the jurisdiction, custody, or control of the U.S. Government.

**8. Environmental Assessment Required for Cleanup Grant Applications:**

A written ASTM E1903-11 or equivalent Phase II Environmental Site Assessment report must be completed prior to application submission. A Phase II Environmental Site Assessment conducted on the former Pillsbury Mills site on behalf of MPF in August 2022 identified polynuclear aromatic hydrocarbons (PNAs) and select Resource Conservation and Recovery Act (RCRA) metals in soil and groundwater at concentrations exceeding the applicable Tier 1 remediation objectives (ROs) established in 35 Ill. Adm. Code Part 742, Tiered Approach to Corrective Action Objectives (TACO). In addition, cadmium was identified at concentrations exceeding the toxicity characteristic threshold for hazardous waste under RCRA which requires cleanup under the Illinois Environmental Protection Agency (IEPA) voluntary cleanup program. . Further environmental assessment, completed in October of 2022, identified asbestos-containing building materials (ACBMs), lead based paint, metal plating impacted floor decking, light fixtures with PCB containing ballasts and mercury containing light bulbs.

**8. Environmental Assessment Required for Cleanup Grant Applications:**

Phase II Environmental Site Assessments or Equivalent Reports were completed at the project sites. The Phase II ESA for the Former Pillsbury Mills site was conducted in the summer of 2022 and final report is dated August 11, 2022. The scope of work for this Phase II ESA included the following tasks:

- Ground penetrating radar (GPR) scan to identify potential orphaned USTs or indications of UST excavations.
- 70 soil borings to facilitate the collection of soil samples for laboratory analysis.
  - 15 of the 70 locations to be sampled for asbestos within the first six (6) inches below ground surface.
- Installation of 15 monitoring wells to facilitate the collection of groundwater samples for laboratory analysis.

**9. Site Characterization:**

For an Applicant that is proposing a site(s) that is eligible to be enrolled in a voluntary response program, attach a current letter from the appropriate State Environmental Authority that:

- i. Affirms that the site(s) is eligible to be enrolled in the state voluntary response program
- ii. Indicates whether the site(s) is enrolled, or intends to be enrolled, in the state voluntary response program
- iii. Indicates that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site(s) or indicates that additional assessment is needed to sufficiently characterize the site(s) for the remediation work to begin; and affirms that there will be a sufficient level of site characterization from the environmental site assessment performed by June 15, 2023, for the remediation work to begin on the site

IEPA has provided a Site Characterization letter for the former Pillsbury Mills site, which is attached to this Threshold Criteria.

**10. Enforcement or Other Actions:** The prior owners for the site had illegally demolished a building without proper notification and asbestos abatement. As a result the site was sealed by the IEPA and Illinois Attorney Generals office. Further a USEPA Time Critical Removal Action was completed. Moving Pillsbury Forward worked with the IEPA, AG and EPA to remove all legal issues and liens from the property. There are no longer any enforcement actions on the property.

**11. Sites Requiring a Property-Specific Determination:** The former Pillsbury Mills site does not require a property-specific determinations based on review Section 1.5 in the Information on Sites Eligible for Brownfields Funding under CERCLA 104(k) of the FY20 Guidelines for Brownfield Cleanup Grants. The USEPA lien from the Time Critical Removal Action was released in April 2021.

## **12. Threshold Criteria Related to CERCLA/Petroleum Liability:**

### **a.) Property Ownership Eligibility – Hazardous Substances Sites**

**(1) Exemptions to CERCLA Liability - Property Acquired Under Certain Circumstances by Units of State and Local Government - CERCLA §101(20)(D) Liability:** No exemption is needed. Moving Pillsbury Forward completed a Phase I Environmental Site Assessment prior to taking site ownership.

### **Information on Liability and Defenses/Protections:**

- a. **Information on the Property Acquisition:** Once the IEPA and AG settled the legal matters with the prior owners and the EPA lien was lifted, MPF was able to take ownership, but not before completing a Phase I ESA.
- b. **Date on which the property was acquired:** Moving Pillsbury Forward took ownership of the site on March 22, 2022.
- c. **Contribution Toward Hazardous Substances Disposal:** All hazardous waste and otherwise was generated prior to MPF acquiring the property. MPF has not caused or contributed any release of hazardous substance at the site. MPF has not arranged for any hazardous disposal or transported hazardous substances to the site.
- d. **Affirm that you have you not caused or contributed to any release of hazardous substances at the site:** All hazardous waste and otherwise was generated prior to MPF acquiring the property. MPF has not caused or contributed any release of hazardous substance at the site. MPF has not arranged for any hazardous disposal or transported hazardous substances to the site.
- e. **Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site:** All hazardous waste and otherwise was generated prior to MPF acquiring the property. MPF has not caused or contributed any release of hazardous substance at the site. MPF has not arranged for any hazardous disposal or transported hazardous substances to the site.

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

### **a. Describe how you will oversee the site:**

MPF intends to enroll the site into the Illinois EPA voluntary Site Remediation Program (SRP) in pursuit of a No Further Remediation (NFR) letter relating to the identified subsurface impacts. Accordingly, the numerical cleanup objectives for subsurface contamination are the TACO remediation objectives for residential, industrial/commercial, and construction worker receptors.. We also know that asbestos, and lead based paint exist the buildings. The first priority is to demolish the buildings on-site. The asbestos and lead based paint of big parts of the preparation for demolition and also providing public safety. Once the buildings are removed the SRP work will begin.

**b. Provide your plan to acquire access to relevant adjacent or neighboring properties if necessary:** This is not needed or applicable for this site, as the site would be stand-alone.

#### **14. Community Notification:**

##### **a. Draft Analysis of Brownfield Cleanup Alternatives**

A Draft Analysis of Brownfield Cleanup Alternatives (ABCA) was prepared for the project site. Moving Pillsbury Forward made it available to the public for review and comment on November 1, 2023. The ABCA and DRAFT Cleanup Grant Application were available for review here: <https://pillsburyproject.org/pillsbury-project-news/moving-pillsbury-forward-to-apply-for-brownfield-grant/>) The DRAFT ABCA is included in this grant submittal.

##### **b. Community Notification Ad**

Moving Pillsbury Forward published a community notification ad in the local newspaper, the Daily Gazette, on October 26, 2023. This ad indicated the following:

- that a copy of the City's grant application, including the Draft ABCA, is available for public review and comment;
- how to comment on the draft application;
- where the draft application is located (with the Board Secretary and Legal Counsel and on the Moving Pillsbury Forward website); and
- the date and time of a public meeting (November 6, 2023 at 6:00pm)

The Certificate of Publication from the local newspaper for the community notification ad is included in this grant submittal. In addition, we have included a link to the Moving Pillsbury Forward website (<https://pillsburyproject.org/pillsbury-project-news/moving-pillsbury-forward-to-apply-for-brownfield-grant/>) to illustrate the availability of the draft ABCA and application on MPF's website.

##### **c. Public Meeting**

The MPF held a Public Meeting on November 6, 2023 at 6:00pm to discuss the draft application and consider public comments on the application and project. From the Public Meeting, MPF is including the following in their grant application submittal:

- the comments or a summary of the public comments received;
- the applicant's response to those comments;
- meeting notes or a summary of the public meeting; and
- meeting sign-in sheet

##### **d. Submission of Community Notification Documents**

Moving Pillsbury Forward has included the items listed below in their grant application submittal to US EPA:

**Moving Pillsbury Forwards  
FY24 BROWNFIELDS CLEANUP GRANT**

- a copy of the draft ABCA
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application
- the comments or a summary of comments received
- the applicant's response to those public comments
- meeting notes or summary from the public meeting
- meeting sign-in sheets



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

**Subject: State Acknowledgement Letter for Moving Pillsbury Forward  
FY2024 US EPA Brownfield Cleanup Grant Application**

11/8/2023

Moving Pillsbury Forward  
ATTN: Chris Richmond  
PO Box 404  
Springfield, IL 62705

Dear Chris Richmond,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Cleanup Grant application to U.S. EPA. Moving Pillsbury Forward is applying for a \$2,652,300 Cleanup Grant.

The grant will be a Cleanup Grant for Hazardous Substances and will be used on the former Pillsbury Mills Site located at 1525 E. Phillips Avenue, Springfield, Illinois. The site is currently enrolled in the State of Illinois Site Remediation Program. Based on the current information, there is a sufficient level of site characterization.

Illinois EPA acknowledges Moving Pillsbury Forward's efforts to obtain federal Brownfields funds for this project. If you have any questions, I may be contacted at the above address or telephone numbers below, or at [Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov).

Sincerely,

Jacob Fink  
Brownfield Program Administrator  
Bureau of Land/Office of Site Evaluation  
Office# (217) 785-8726  
Cell# (217) 986-0818  
[Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov)



2125 S. First Street, Champaign, IL 61820 (217) 278-5800  
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120  
9511 Harrison Street, Des Plaines, IL 60016 (847) 294-4000  
595 S. State Street, Elgin, IL 60123 (847) 608-3131

2309 W. Main Street, Suite 116, Marion, IL 62959 (618) 993-7200  
412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760