COMMUNITY DEVELOPMENT
(712) 328-4629

City of Council Bluffs, Iowa Brownfields Cleanup Grant Application
Narrative Information Sheet:

1. Applicant Identification: City of Council Bluffs, 209 Pearl Street, Council Bluffs, IA 51503
2. Funding Request:
   a. Assessment Grant Type: Single Site Cleanup
   b. Federal Funds Requested:
      i. Funding about requested: $500,000
      ii. Cost Share Waiver Request: No
   c. Contamination: Hazardous Substance
3. Location:
   a. City: Council Bluffs
   b. County: Pottawattamie County
   c. State: Iowa
4. Property Information: Reliance Battery Site, 813 22nd Avenue, Council Bluffs, IA 52060
5. Contacts:
   a. Project Director: Courtney Harter, 209 Pearl Street, Council Bluffs, IA 51503, Phone: (712) 328-4629, Email: Charter@councilbluffs-ia.gov
   b. Chief Executive/ Highest Ranking Elected Official: Matthew J. Walsh, Mayor, 209 Pearl Street, Council Bluffs, IA 51503, Phone: (712) 890-5264, mayor@councilbluffs-ia.gov
6. Population: 62,478 (2014-2018 American Community Survey 5-Year Estimate)

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7. Other Factors Checklist:

Other Factors	**Page#**
Community Population is 10,000 or less	**No**
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	**No**
The priority brownfield site(s) is impacted by mine-scarred land.	**No**
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).	**No**
The priority site(s) is in a federally designated floodplain (levee protected)	**1**
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.	**3**

8. Letter from the State or
   Tribal Environmental Authority: Attached

1. PROJECT AREA DESCRIPTION AND PLANS REVITALIZATION

1./1.a.i. Target Area and Brownfields/Background and Description of Target Area: The City of Council Bluffs is a dynamic diverse community of 62,316 people (U.S. Census Estimate, 2017) strategically located on the Missouri River across from downtown Omaha, NE, in Pottawattamie County, Iowa. Council Bluffs has had significant links to agricultural, food production, and heavy manufacturing since its incorporation in 1853. In 1867 railroads came and fostered much of the city's industrial development. The wide availability of access attracted railroad-dependent uses such as foundries, bulk warehousing, general manufactures, grain elevators, rail yards, coal yards, lumber yards, and food processing plans. At the turn of the 20th Century Council Bluffs was a leading industrial city in Iowa. The landscape of the city's economic engine still includes major industries of railroad and food processing, but overall local business and industry has experienced a significant rate of decline leaving well over 100 abandoned and underutilized brownfield properties scattered through the city and especially within the South Expressway Corridor, the target area. The South Expressway Corridor is protected by a levee to reduce the risk of flooding from the Missouri River. Without the levee, approximately 64% of the incorporated city limits would be at risk of extreme flooding. The target area lies within Census Tract 308.

The South Expressway Corridor is a high priority revitalization area that the City is working to redevelop. In the City's recently updated comprehensive plan, *Bluffs Tomorrow 2030*, the South Expressway Corridor is prime for redevelopment based on its proximity to downtown. With the removal of a rail corridor through the South Expressway, traffic conflicts will be greatly reduced allowing for greater access to the area. The Former Reliance Battery Site (the "Site") for which the Environmental Protection Agency (EPA) Cleanup funding is being requested is the Former Reliance Battery Manufacturing Company location within the South Expressway Corridor planning area.

1.a.ii. Description of the Brownfield Site: The Site encompasses approximately one half of the city block and is approximately two acres in size. The Site is surrounded by single-family residential homes. The Site was used for manufacturing, repairing and reconditioning lead acid batteries since the early 1920's through 1974. In 1974 the business was incorporated as the Former Reliance Battery Manufacturing Company (RBMC). In February of 1985, the State of Iowa Department of Natural Resources (IDNR) conducted a preliminary assessment and concluded that there was a potential for soil and groundwater contamination at the Site. In May of 1989, an EPA coordinated site investigation identified soil on the Site and adjoining residential properties that contained elevated concentrations of lead. Additional investigations in 1989 and 1990 were conducted to define the extent of the lead soil contamination on the Site and adjoining properties. Dust and drinking water samples were collected from the interior of the adjoining residential homes. Lead was identified in soil at concentrations of up to 115,000 milligrams per kilogram (mg/kg) at the Property and at concentrations of 2,200 mg/kg from two of the adjoining residential properties. Drinking water samples did not contain lead concentrations exceeding regulatory limits.

In late September of 1990, the EPA discovered that RBCM had excavated soil from the contaminated areas of the Site. RBMC did not notify the EPA that they were conducting an excavation and EPA did not have an opportunity to supervise or document the procedures. RBMC estimated that 700 cubic yards (CY) of soils were excavated and stored in various onsite containers until disposed of by the EPA during subsequent regulated lead contaminated soil excavation procedures. The EPA re-sampled areas of the Site and determined concentrations were not reduced below EPA cleanup levels and that concentrations were substantially higher in some areas. The EPA advised RBMC not to take any further action to remove contaminated soils and determined that an immediate response action was required to mitigate human exposure to elevated lead concentrations in dust and soil. On November 9, 1990, the Regional

EPA Administrator signed an Action of Memorandum selecting excavation areas and an off-site disposal plan for lead contaminated soil at the Site and adjoining properties. Soil excavation were completed in May of 1991. No further EPA Superfund activities were expected at the Site, no further response under CERCLIS was required, and archiving the property was deemed appropriate by the EPA; however, the lead in shallow soil at concentrations of up to 2,400 mg/kg remain at the Site exceeding the current IDNR Statewide Standard (SWS) of 400 mg/kg.

According to the March 9, 1992 EPA Report, potential areas of lead releases at the Site and surrounding properties came from operation of the baghouse, ventilation collection systems, the lead oxide bulk storage tank loading operations and from fugitive emissions from the plant when doors and windows were left open during manufacturing.

On February 19, 1998, the DNR Solid Waste Section responded to the EPA Region 7 Superfund Divisions request for concurrence regarding discontinuing all investigation and/or cleanup activities at the Site and "Archiving" from the active CERCLIS database. The DNR's opinion was that archiving the RBMC was not appropriate and continued EPA oversight was required given that; RBMC has a given history of violations of both environmental and worker safety regulations; continued hazardous material releases had occurred on the Property since the 1991 EPA administrative action, and in April of 1995, an accident occurred at RBMC that resulted in the hospitalization of a worker with a lead blood level of 357 micrograms per deciliter (3.5 times the potential lethal does for lead). Based on the Site history and current operations, some form of continued EPA oversight was requested to prevent future releases in a timely manner. However, the Site was "Archived" on July 5, 2011.

A Phase I ESA was conducted on the Site on April 27, 2020, as part of the City of Council Bluffs' due diligence prior taking ownership of the site. During the Phase I ESA, seven recognized environmental conditions (RECs) were identified, including that the property was utilized as a battery manufacturing facility from circa 1928 through 2019. While three RECs were identified in connection with the adjacent properties. Further investigation is warrant if additional information regarding the identified RECs is desired. On August 17th, 18th, and 19th, 2020, thirty-two soil borings were advanced using a Geoprobe® track-mounted rig with a direct push attachment to a depth of five to 10 feet bgs to evaluated the extent of RCRA metals, specifically lead soil contamination in surface soil throughout the Site . Additionally, nine temporary monitoring wells were advanced to a maximum depth explored of 20-feet bgs to evaluate soil near the soil and ground interface and groundwater conditions at the Site. The results of the sampling are summarized as follows:

- The distribution of concentrations of VOCs, SVOCs and RCRA metals in soil exceeding the SWS have been defined to the Site boundaries. Elevated concentrations of lead and arsenic exceeding the SWSs (400 and 1.9 mg/kg) are confined with surficial, unconsolidated sane, silt and gravel ubiquitous throughout the Site from the top of the ground surface to two to five feet bgs. Lead concentrations of 1.7 to 30 times higher than the SWS of 400 mg/kg are present at the surface and shallow depths and within proximity to single-family residential dwellings. Up to 6,300 cubic yards (yds3) of lead contaminated surficial sediments may be present at the Site.
- Tetrachloroethylene (PCE) chlorinated solvent was identified at soil sample locations SB-5 3-5' bgs (0.0192 mg/kg); SB-16 10-11' bgs (0.0178 mg/kg); SB-25 14-15' (0.0175 mg/kg) near the depth of the soil and groundwater interface zone between 10 and 15 feet bgs.
- The distribution of concentrations of VOCs, SVOCs and RCRA metals in groundwater exceeding the SWS have been defined to the Site boundaries. Dissolved lead was identified at monitoring well location SB-33/TMW-9 on the southwest corner of the building at concentration of 31.7 micrograms per liter (µg/L). The concentration exceeds the SWS for protected groundwater

sources (15 µg/L). The remaining constituents were below the SWS or below the laboratory reporting limits.

- One private well listed as the Council Bluffs Community Schools is located within 1,000 feet of the Site.

Based on the findings and conclusions resultant of data collected during the Site Investigation and Characterization Report (SICR), the detected constituents of lead in surface soil presents a risk to human health and the environment. The SICR recommends a remedial action plan (RAP) and Soil Management Plan (SMP) to address environmental liabilities associated with the Site redevelopment as single and/or multi-family residential and mitigate risk to associated receptors and pathways to human contact (i.e., direct contact and inhalation, ingestion, water main and water service lines, vapor intrusion to sanitary sewers and enclosed space basement receptors). RAP recommendations may include construction of engineered barriers to prevent contact between humans and impacted soil and groundwater; over-excavation of shallow contaminated soils and disposal to a regulated facility; installation of active and passive vapor mitigation systems; construction of chemical resistant water mains and water service lines servicing the development and established environmental covenant or deed restriction prohibiting the construction of water supply wells on the Property.

b/b.i. Revitalization of the Target Area/Reuse Strategy and Alignment with Revitalization Plans: Although this brownfields site has presented its fair share of challenges for the City, it now presents an opportunity. This opportunity will allow for the City to cleanup this Site and add much need affordable housing in an established residential area within the City's urban core. The City's recently updated comprehensive plan, *Bluffs Tomorrow 2030,* has identified the Former Reliance Battery Factory Site area as a prime location for affordable housing. A key component of the City's redevelopment strategy includes mitigating the impacts of commercial and industrial use on neighborhoods within the South Expressway Corridor area. The *Bluffs Tomorrow 2030* plan specifically identifies objectives that form the basis for the City's South Expressway Corridor redevelopment strategy. Specifically, the plan states the following objective: "Minimize the encroachment of and impacts from commercial areas, industrial uses, and rail corridors on adjacent neighborhoods through land use planning, screening, and buffering." The cleanup of the Former Reliance Battery Factory Site will meet this objective by cleaning up the Site to residential standards. It will allow for the creation of much needed affordable housing within the urban core and provide land use uniformity as the Former Reliance Batter Factory Site is surrounded by residential development. The *Bluffs Tomorrow 2020* plan has a neighborhoods and housing goal of "Enhance and maintain the City's neighborhoods to provide the housing, character, and supporting amenities to retain and attract residents to Council Bluffs." The proposed single-family or attached two-family development aligns with the Bluffs Tomorrow 2020 goal while maximize the number of units on the Site. The redevelopment plan calls for eight to twelve units depending on layout. Fifty-one percent of all the units will be marketed to eighty percent of the median family income providing necessary workforce housing. With the development of 8-12 new residential development will provide on the low in $867,600 in new assessed value for the neighborhood.

b.ii. Outcomes and Benefits of Reuse Strategy: The positive impacts of brownfield redevelopment with a residential area residential area regarding environmental, economic, and social effects are immense. The most significant benefits are:

1). Cleanup is necessary to support affordable housing on the Site. Additional affordable housing will increase the housing supply in an area that is desperately in need of housing.

2). Cleanup and redevelopment of the Site will spur additional investment within the Target Area.

3). Cleanup will protect the surrounding single-family development from contamination encroachment

from the Site.

4). Almost $1 million in new assessed value in the Target Area.
5). The residential development will result in high-quality, healthy living environment for residents.
6). With green and sustainable building methods incorporated into the new infill development residents will have lower utility costs, and protection to the environment by conserving energy, water, materials and other resources.

c./c.i. Strategy for Leveraging Resources/Resources Needed for Site Reuse: The City of Council Bluffs has a proven experience with securing funding for successful redevelopment efforts within the Target Area. The South Expressway Corridor is a redevelopment priority for the City and substantial financial and programmatic resources have been and will continue to be allocated to this area. These previous and future resources include both public sector, private sector and foundation funding for assessment, cleanup, and redevelopment. Resources secured and committed to the Target Area to date is as follows:

Southwest Expressway Area Local Leverage (Actual Funding Secured)							
Location	CDBG	NSP	Local	Waterworks	Iowa DOT	IDNR 128(a)	Total
22nd Ave, & S. 6th St.: Acquisition and Demo	$279,217	$225,000	$13,205				$517,422
6th St. Reconstruction (9th to 12th Ave.)			$875,000				$875,000
7th St. fiber optics (10th to 19th Ave.)			$100,000				$100,000
8th St. and 12th Ave. (street, water, sanitary, storm sewer)				$118,246			$118,246
Indian Creek Trail (Sunset Park to South Expressway)			$850,000				$850,000
Levee Accreditation			$10,983,751				$10,983,751
Railroad Track Removal					$150,000		$150,000
813 22nd Ave (acquisition and ESA)	$159,220					16,020	$175,240

c.ii. Use of Existing Infrastructure: The redevelopment of the Site, an infill lot that has provided little economic value for decades, will take advantage of existing public and private infrastructure already serving the Site. It is anticipated that exiting utilities will be able to easily handle the intake from the planned housing development. The City intends to require the demolition contractor to salvage and recycle as much of the non-lead-based-paint affected building materials as possible. The new affordable

housing development will explore incorporating green/sustainable building and stormwater management practices into the redevelopment of the Site.

2. Community Need and Community Engagement

2.a./2.a.i. Community Need/The Community's Need for Funding: With a population under 65,000, Council Bluffs faces the task of handling several urban issues (high poverty, lower household income) while grappling with older housing, commercial and industrial building stock. The City also is contending with aging infrastructure and poor aesthetics of commercial and retail areas which further dampens reinvestment. Due to differences in commercial taxes between Iowa and Nebraska and property taxes between the City and Pottawattamie County, new development must be heavily subsidized to attract investment. The Former Reliance Battery Factory Site desperately needs to be cleaned up. The City has already invested $175,000 for acquisition and environmental site assessments of the Site and has a total City Investment of $500,000 budgeted for the Site. The Site currently sits vacant and poses adverse environmental impacts on the surrounding neighborhood reducing property values and negatively impacting reinvestment, throughout the Target Area.

2.a.ii./2.a.ii.(1). Threats to Sensitive Populations/Health or Welfare of Sensitive Populations: The identified sensitive population (children and seniors) within the Target Area (Census Tract 308) make up 57% of the total population. Seniors make up 29% while children make up 28% of the population (2014-2018 American Community Survey 5-Year Estimates). While only two percent of the population is below the poverty level, over 10% of households within the Target Area are receiving food stamp assistance (2014-2018 American Community Survey 5-Year Estimates). The Target Area is indicated on the USDA Food Access Research Atlas as low-income census tract where a significant number of residents are one mile from the nearest supermarket. This designation indicates reduce access to fresh and healthy food options for the sensitive populations within the Target Area. Additionally, within Pottawattamie County (lowest level of data available), according to the Iowa Public Health Tracking (IPHT) program, roughly 1% of the 1,042 children screened where confirmed to have an elevated blood lead (EBL) level. Therefore, it is estimated that approximately 10 children are EBL cases within the target area. These children will have to continue to experience a disproportionate share of adverse health and environmental effects if conditions remain unchanged. The redevelopment of the Former Reliance Battery Factory into affordable housing will create additional housing and job opportunities within the Target Area. This Site will serve as a catalyst for other redevelopment projects within the Target Area.

2.a.ii.(2). Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to the County Health Rankings & Roadmap program, Pottawattamie County ranked 88th of Iowa's 99 counties in terms of health outcomes (1 best to 99 worst). The rankings include health factors such as high school graduation rates, obesity, smoking, unemployment, access to healthy foods, the quality of air and water, income inequality, and teen births. Potential exposure to numerous contaminants via direct contact, inhalation of airborne particulates, and vapor intrusion pathways negatively impact area individuals. Several recent health studies indicate exposure to carcinogens in the great Council Bluffs area is higher than other communities and counties in Iowa. A University of Iowa study entitled *2018 Cancer in Iowa* report listed Pottawattamie County as being one of the top eight counties in Iowa for estimated number of deaths attributed to cancer. The National Cancer Institute (NCI) lists Pottawattamie County cancer incidence rates (including all races, all ages, and both sexes) in Iowa from 2012-2016 (http://statecancerprofiles.cancer.gov) as 481, which is higher than the U.S. rate of 449 per 100,000. According to the State Health Registry of Iowa, the estimated number of new cancers in Pottawattamie County in 2018 was 530 and estimated number of cancer deaths in the county was 200. According to the EPA EJSCREEN, the Target Area is in the 71st percentile for cancer risk compared to the rest of Iowa.

The proposed EPA cleanup grant funding will allow the City to remediate this contaminated Site that could be contributing to less healthy conditions within the City of Council Bluffs.

2.a.ii.(3). Disproportionately Impacted Populations: The Target area is characterized by a household median income that is over $6,000 lower than the Nation's household income. Within the Target Area 23.5% of households are receiving supplemental social security income, public assistance, or food stamps (2014-2018 American Community Survey 5-Year Estimates). As evident by the data, the Target Area has sensitive populations that may be more susceptible to the hazardous contaminants of this brownfields Site, making it critical for the City to clean it up to protect the health of all the residents living near this Site. The target area population has environmental justice challenges and disproportionately share the negative environmental consequences resulting from this Site. This funding is critical for the reduction of environmental threats at the Site.

2.b./2.b.i. Community Engagement/Project Involvement: The Council Bluffs City Council approved the EPA cleanup grant application process (Resolution #) at the October 12, 2020 City Council meeting. Draft versions of the brownfield cleanup grant application and associated Analysis to Brownfield Cleanup Alternatives (ABCA) were available for public comment. The resolution affirms that the well-being of the community is an important part of the upholding the public interest and trust.

2.b.ii. Project Roles

Name of Organization/Entity/Group	Point of Contact (name/email/phone)	Specific Involvement in the Project or Assistance Provided
Iowa Department of Natural Resources	Name: Mel Pins Email: Mel.pins@dnr.iowa.gov Phone: 515.725.8344	Provide input on cleanup and additional grant funding for cleanup if necessary
Council Bluffs Community Development	Name: Brandon Garrett Email: bgarrett@councilbluffs-ia.gov Phone: 712.890.5356	Lead City engagement in development of affordable housing. Provide and administer CDBG and Home funding for affordable housing.
Pottawattamie County Public Health Department	Name: Matt Wyant Email: matthew.wyant@pottcounty.ia.gov Phone: 712.328.5792	Assist with answering health related questions regarding contaminants of concern.
Neighbor-Works Home Solutions	Name: Leslie Coleman Email: lcoleman@nwhomesolutions.org Phone: 712.328-6602	The City has a long successful partnership with NeighborWorks in creating quality affordable housing. NeighborWorks is a potential developer for the redevelopment of the Site.
General Public – Target Neighborhood around the Former Reliance Battery Factory		Provide feedback regarding cleanup and redevelopment of the Site.

2.b.iii. Incorporating Community Input: The City recognizes the importance of community involvement activities and the role they play in building social strength and stability. This will be especially true for the neighborhood surrounding the Former Reliance Battery Factory, which is why the City has actively been engaging residents throughout the process. Most recently, on October 12, 2020, the City hosted a public meeting to share and solicit feedback on the draft EPA Cleanup Grant application and the draft ABCA. In addition, the City actively engages community participation and involvement in all phases of the redevelopment within the South Expressway Corridor (target area) area. This was especially true during development of the *Bluffs Tomorrow 2030* Plan. As the cleanup moves forward on the Former Reliance Battery Factory Site information on the project schedule, drafts and final versions of reports (including cleanup plan and redevelopment plan), options for comment and feedback will be made available on a created Council Bluffs Brownfields website. This website will also inform citizens how the EPA has positively assisted the City with cleaning up and redeveloping this Site. The City will host at least two open house events to keep interested citizens and neighborhood residents apprised about the project progress and to solicit community input. Input from each open house event will be recorded and incorporated where appropriate. Open house events will be published in the local newspaper and posted on the City's website including the brownfields website as well as posted in public buildings such as City Hall, the public library and at the Site. Social media outlets such as Facebook and Twitter will serve as another forum to keep citizens aware of this important endeavor. The City plans to make available material in other languages as necessary for non-English speaking residents. The combination of these community input actions will provide an opportunity to update and engage residents on the progress of the City's historically successful (i.e., Phoenix Award Winner for International Harvester Loft Cleanup and Redevelopment) and ongoing brownfields program.

3. Task Descriptions, Cost Estimates, and Measuring Progress

3.a. Proposed Cleanup Plan: The Former Reliance Battery Factory Site was found to have high levels of lead contaminated soil throughout the Site, and hazardous materials within the structure. The plans to excavate 7,000 cubic yards of lead contaminated surface soil and dispose of the contaminated soil at an approved facility offsite. The City will utilize a license asbestos contractor to abate 250 square feet of ACM, 10 linear feet of ACM and dispose of the material in an approved facility off site. The City will competitively procure the services of a Qualified Environmental Profession (QEP) in accordance with grant requirements to oversee the response actions of this project. The City will require the QEP to be experienced with EPA Brownfields Cleanup projects and hold State of Iowa asbestos certifications and lead inspection and abatement design credentials.

3.b./3.b.i/3.b.ii./3.b.iii/3.b.iv. Description of Tasks/Activities and Outputs/Project Implementation/ Anticipated Project Schedule/ Task/Activity Lead/Outputs

Task 1: Cooperative Agreement Oversight
i. Project Implementation: Cooperative Agreement Oversight will be conducted by the City of Council Bluffs and will include but is not limited to general grant management, (QEP) procurement and oversight, ensuring reporting requirements are met, and budget and invoice reconciliation, ACRES reporting and overall planning and coordination of cleanup activities.
ii. Anticipated Project Schedule: Quarters 1-12
iii. Task/Activity Lead(s): Courtney Harter with assistance from the QEP
iv. Output(s): • Workplan • Quarterly, Annual and Final Document Closeout Reporting • Monthly Funding Draws Prepared/Reconciled and Submitted to EPA • Project Scopes of Work

Task 2: Community Engagement/Outreach
i. Project Implementation: This task includes conducting community engagement activities to inform the public on cleanup plans and implementation while providing opportunities for the community to provide feedback; outreach with the neighborhood; and developing and updating the project website and printed materials.
ii. Anticipated Project Schedule: Quarters 1-12
iii. Task/Activity Lead(s): Courtney Harter and QEP
iv. Output(s): • Two Public Meetings • Project Website • Neighborhood Meeting • Print Material
Task 3: Cleanup Planning
i. Cleanup planning will include finalizing the ABCA document, preparing the Quality Assurance Project Plan for confirmation sampling, and negotiating and receiving the necessary regulatory approvals. Cleanup specifications documents will be submitted to EPA and/or IDNR for approval prior to obtaining bids from qualified cleanup contractors. Following the acceptance of these documents, the City will initiate a competitive selection process and contract with a qualified cleanup contractor to implement the response activity.
ii. Anticipated Project Schedule: Quarters 3-12
iii. Task/Activity Lead(s): Courtney Harter and QEP
iv. Output(s): • Final ABCA • Quality Assurance Project Plan • SHPO • Technical Specifications for site cleanup • Remediation Contract
Task 4: Site Cleanup
i. This task includes but is not limited to, correspondence with the QEP and cleanup contractor, providing minimal site prep and providing site security during cleanup.
ii. Anticipated Project Schedule: Quarters 12-18
iii. Task/Activity Lead(s): Courtney Harter and QEP
iv. Output(s): • Site cleaned up • Cleanup monitoring of the Site

c. Cost Estimates: The table below shows the budget for the project and is followed by a description of how costs for each task were developed per budget category. As noted, the City will provide a cost share of 20% ($100,000) utilizing Community Development Block Grant Funds designated for this Site. The City will cover any indirect costs. A Cost estimates were developed based on SICR and initial sampling and analysis.

Budget Categories		Project Tasks				Total
		Task 1 Cooperative Agreement Oversight	Task 2 Community Engagement	Task 3 Cleanup Planning	Task 4 Cleanup	
Direct Costs	Personnel	$8,600	$4,000	$2,300	$2,300	$17,200
	Travel	$3,500	$0	$0	$0	$3,500
	Contractual*	$12,300	$7,000	$30,000	$430,000	$479,300
Total Direct Costs		$24,400	$11,000	$32,300	$432,300	$500,000
Total Indirect Costs		$0	$0	$0	$0	$0

Total Federal Funding (Not to exceed $500,000)	$24,400	$11,000	$32,300	$432,300	$500,000
Cost Share (20%)	$0	$0	$0	$100,000	$100,000
Total Budget	$24,400	$11,000	$32,300	$532,300	$600,000

Budget Allocation:

*Please note the City verified contractual cost with QEPs.

• Task 1: Cooperative Agreement Oversight is based off ~151 hours at $56.94/hr. (average salaries of Director and Brownfields Coordinator) = $8,600 (rounded up); Travel will cover airfare and/or mileage, hotel and meals for EPA sponsored brownfield events; Contractor costs will be competitively bid with approved hourly rates.

•Task 2 Community Outreach: Personnel is based of ~70 hours at $56.94/hr. (average salaries of Director and Brownfields Coordinator) = $4,000 (rounded up); Contractor costs will be competitively bid with approved hourly rates.

•Task 3 Cleanup Planning: Personnel cost is based of ~40 hours at $56.94/hr. (average salaries of Director and Brownfields Coordinator) = $4,000 (rounded up); Contractor costs will be competitively bid with approved hourly rates.

•Task 4 Site Cleanup: Personnel cost is based of ~40 hours at $56.94/hr. (average salaries of Director and Brownfields Coordinator) = $4,000 (rounded up); Contractor costs will be competitively bid with approved hourly rates.

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

4. Programmatic Capability and Past Performance

4.a/4.a.i./4.a.ii./4.a.iii. Programmatic Capability/Organizational Structure/Description of Key Staff/ Acquiring Additional Resources: The City has the necessary organizational structure and capacity to successfully administer the grant as demonstrated by the successful implementation of previous brownfield grants. Mr. Brandon Garrett, City of Council Bluffs Community Development Director and Ms. Courtney Harter, City of Council Bluffs Housing and Economic Development Manager, will be responsible for management of the grant. This management team is efficient, and their level of expertise, qualifications, and experience will result in timely successful expenditure of funds completing all technical, administrative, and financial grant requirements, as demonstrated previously. Mr. Garret received his B.A. in Regional and Community Planning from Kansas State University in 2001 and has 17 years of experience in urban planning. In his capacity as the Community Development Director, Mr. Garrett is responsible for the overall administration of the Community Development Department. Ms. Harter received her B.A. in political science from Northwest Missouri State University in 2006 and Master of Public Administration from University of Nebraska at Omaha in 2009. As the Housing and Economic Development Manager, Ms. Harter is the city's Brownfields Coordinator, responsible for administering the City's EPA Brownfields Program and assisting with the management of the Community Development Block Grant and HOME Programs. Ms. Harter has been employed with the City for five

years. The Council Bluffs' Community Development Department has extensive experience in efficiently and effectively managing federal and state grants. This includes$1,400,000 in U.S. EPA Brownfields Grants and approximately $2,000,000 annually in CDBG and HOME funds and program income. In recent years, the city has secured funding from the State of Iowa: $3,000,000 for 125 West Broadway Mixed Use Redevelopment, $2,500,000 for Gunn Elementary School/Linden Place Apartments, and $3,500,000 from the Iowa DOT on three infrastructure grants for S. 24th Street reconstruction, River's Edge Infrastructure, and Gifford Road reconstruction. U.S. Department of Housing and Urban Development has awarded $2,300,000 to the City for programs to protect children and families from lead-based paint and other home health hazards. Finally, this spring the City was awarded a $300,000 U.S. EPA Brownfields Community-Wide Assessment Grant.

The City will acquire additional technical expertise and resources through the service of a qualified EPA brownfield experienced QEP, subject to a competitive selection process. This contractor will assist with project management, community engagement, cleanup planning, and Site cleanup activities. The City has implemented this resource acquisition process successfully on previous brownfield grant resulting in achievement of all cooperative agreement objectives. The City has a significant history working closely with the executive officer of the Iowa Brownfield Program to provide technical expertise and advise.

4.b./4.b.i./4.b.i.(1)./4.b.i.(2). Currently Has or Previously Received an EPA Brownfields Grant/ Accomplishments/Compliance with Grant Requirements: The EPA has awarded the City of Council Bluffs seven Brownfields Grants totaling $1.5 million over twelve year. This includes three Assessment Grants in 2005, 2008, and 2020, a single Cleanup Grant in 2009 and 2011, and a Brownfield Area Wide Planning Grant in 2016. The City has worked diligently to update the ACRES database as additional information has become available. City officials are committed to continuing to report these future accomplishments to the EPA even beyond the grant period to support the EPA Brownfields program. For each of the EPA brownfields grant the City of Council Bluffs was compliant with the grant workplan, schedule and terms and conditions, had a history of timely reporting for quarterly reports and other grant deliverables and was up to date with all ACRES reporting.

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City of Council Bluffs, Iowa Brownfields Cleanup Grant Application
Threshold Criteria

1. **Applicant Eligibility:**

   The City of Council Bluffs is an incorporated municipality in the State of Iowa and is eligible for funding.

2. **Previously Awarded Cleanup Grants:**

   No previously awarded EPA Brownfields Cleanup Grant funding has been utilized at this Site.

3. **Site Ownership:**

   The City of Council Bluffs purchased the property, acquiring fee, simple title on September 14, 2020. The City will retain ownership throughout the period of the grant.

4. **Basic Site Information:**

   a) *Site Name:* Former Reliance Battery Site

   b) *Address:* 813 22nd Avenue
   Council Bluffs, IA 52060

   c) *Current Owner of Site:* City of Council Bluffs

5. **Status of History of Contamination:**

   a) *Hazardous Substances or Petroleum:* The site is contaminated by hazardous substances.

   b) *Operational History and Current Uses:* The Site was historically utilized as a battery manufacturing plant from 1925 through 2019 and is in poor and dilapidated condition. Additional environmental record sources from the EPA Region 7 dated March 9, 1992 and the IDNR Contaminated Sites Section date February 4, 1996 and July 1, 2011 were reviewed to enhance and supplement the standard environmental record sources.

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The following summarizes information obtain from those additional sources. Based on a review of available information reviewed from the IDNR Contaminated Sites Section database, the site was used for manufacturing, repairing and reconditioning lead acid batterie since the early 1920's through 1974. In 1974 the business was incorporated as the Former Reliance Battery Manufacturing Company (RBMC). In February of 1985, the State of Iowa Department of Natural Resources (IDNR) conducted a preliminary assessment and concluded that there was a potential for soil and groundwater contamination at the Site. In May of 1989, an EPA coordinated site investigation identified soil on the Site and adjoining residential properties that contained elevated concentrations of lead. Additional investigations in 1989 and 1990 were conducted to define the extent of the lead soil contamination on the Site and adjoining properties. Dust and drinking water samples were collected from the interior of the adjoining residential homes. Lead was identified in soil at concentrations of up to 115,000 milligrams per kilogram (mg/kg) at the Property and at concentrations of 2,200 mg/kg from two of the adjoining residential properties. Drinking water samples did not contain lead concentrations exceeding regulatory limits.

In late September of 1990, the EPA discovered that RBCM had excavated soil from the contaminated areas of the Site. RBMC did not notify the EPA that they were conducting an excavation and EPA did not have an opportunity to supervise or document the procedures. RBMC estimated that 700 cubic yards (CY) of soils were excavated and stored in various onsite containers until disposed of by the EPA during subsequent regulated lead contaminated soil excavation procedures. The EPA re-sampled areas of the Site and determined concentrations were not reduced below EPA cleanup levels and that concentrations were substantially higher in some areas. The EPA advised RBMC not to take any further action to remove contaminated soils and determined that an immediate response action was required to mitigate human exposure to elevated lead concentrations in dust and soil. On November 9, 1990, the Regional EPA Administrator signed an Action of Memorandum selecting excavation areas and an off-site disposal plan for lead contaminated soil at the Site and adjoining properties. Soil excavation were completed in May of 1991. No further EPA Superfund activities were expected at the Site, no further response under CERCLIS was required, and archiving the property was deemed appropriate by the EPA; however, the lead in shallow soil at concentrations of up to 2,400 mg/kg remain at the Site exceeding the current IDNR Statewide Standard (SWS) of 400 mg/kg.

According to the March 9, 1992 EPA Report, potential areas of lead releases at the Site and surrounding properties came from operation of the baghouse, ventilation collection systems, the lead oxide bulk storage tank loading operations and from fugitive emissions from the plant when doors and windows were left open during manufacturing.

On February 19, 1998, the DNR Solid Waste Section responded to the EPA Region 7 Superfund Divisions request for concurrence regarding discontinuing all investigation and/or cleanup activities at the Site and "Archiving" from the active CERCLIS database. The DNR's opinion was that archiving the RBMC was

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not appropriate and continued EPA oversight was required given that; RBMC has a given history of violations of both environmental and worker safety regulations; continued hazardous material releases had occurred on the Property since the 1991 EPA administrative action, and in April of 1995, an accident occurred at RBMC that resulted in the hospitalization of a worker with a lead blood level of 357 micrograms per deciliter (3.5 times the potential lethal does for lead). Based on the Site history and current operations, some form of continued EPA oversight was requested to prevent future releases in a timely manner. However, the Site was "Archived" on July 5, 2011.

A Phase I ESA was conducted on the Site on April 27, 2020, as part of the City of Council Bluffs' due diligence prior taking ownership of the site. During the Phase I ESA, seven recognized environmental conditions (RECs) were identified, including that the property was utilized as a battery manufacturing facility from circa 1928 through 2019. While three RECs were identified in connection with the adjacent properties. Further investigation is warrant if additional information regarding the identified RECs is desired. On August 17th, 18th, and 19th, 2020, thirty-two soil borings were advanced using a Geoprobe® track-mounted rig with a direct push attachment to a depth of five to 10 feet bgs to evaluated the extent of RCRA metals, specifically lead soil contamination in surface soil throughout the Site . Additionally, nine temporary monitoring wells were advanced to a maximum depth explored of 20-feet bgs to evaluate soil near the soil and ground interface and groundwater conditions at the Site. The results of the sampling are summarized as follows:

- The distribution of concentrations of VOCs, SVOCs and RCRA metals in soil exceeding the SWS have been defined to the Site boundaries. Elevated concentrations of lead and arsenic exceeding the SWSs (400 and 1.9 mg/kg) are confined with surficial, unconsolidated sane, silt and gravel ubiquitous throughout the Site from the top of the ground surface to two to five feet bgs. Lead concentrations of 1.7 to 30 times higher than the SWS of 400 mg/kg are present at the surface and shallow depths and within proximity to single-family residential dwellings. Up to 6,300 cubic yards (yds3) of lead contaminated surficial sediments may be present at the Site.

- Tetrachloroethylene (PCE) chlorinated solvent was identified at soil sample locations SB-5 3-5' bgs (0.0192 mg/kg); SB-16 10-11' bgs (0.0178 mg/kg); SB-25 14-15' (0.0175 mg/kg) near the depth of the soil and groundwater interface zone between 10 and 15 feet bgs.

- The distribution of concentrations of VOCs, SVOCs and RCRA metals in groundwater exceeding the SWS have been defined to the Site boundaries. Dissolved lead was identified at monitoring well location SB-33/TMW-9 on the southwest corner of the building at concentration of 31.7 micrograms per liter (µg/L). The concentration exceeds the SWS for protected groundwater sources (15 µg/L). The remaining constituents were below the SWS or below the laboratory reporting limits.

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- One private well listed as the Council Bluffs Community Schools is located within 1,000 feet of the Site.

Based on the findings and conclusions resultant of data collected during the Site Investigation and Characterization Report (SICR), the detected constituents of lead in surface soil presents a risk to human health and the environment. The SICR recommends a remedial action plan (RAP) and Soil Management Plan (SMP) to address environmental liabilities associated with the Site redevelopment as single and/or multi-family residential and mitigate risk to associated receptors and pathways to human contact (i.e., direct contact and inhalation, ingestion, water main and water service lines, vapor intrusion to sanitary sewers and enclosed space basement receptors). RAP recommendations may include construction of engineered barriers to prevent contact between humans and impacted soil and groundwater; over-excavation of shallow contaminated soils and disposal to a regulated facility; installation of active and passive vapor mitigation systems; construction of chemical resistant water mains and water service lines servicing the development and established environmental covenant or deed restriction prohibiting the construction of water supply wells on the Property.

c) *Environmental Concerns:* The Site became contaminated through its operation as a battery factory. Lead oxide, antimonial lead, and acids utilized in the manufacturing of batteries were deposited into the soil of the Site. The Site structure also contains asbestos building materials.

d) *Source, Nature, and Extent of Contamination:* Soil Assessment: The distribution of concentrations of VOCs, SVOCs and RCRA metals in soil exceeding the SWS have been defined to the Site boundaries. Elevated concentrations of lead and arsenic exceeding the SWSs (400 and 1.9 mg/kg respectively) are is confined within surficial, unconsolidated sand, silt and gravel ubiquitous throughout the Site from the top of the ground surface to two to five feet bgs. Lead concentrations of 1.7 to 30 times higher than the SWS of 400 mg/kg are present at the surface and shallow depths and within proximity to single-family residential dwellings. Up to 6,300 cubic yards (yds^3) of lead contaminated surficial sediments may be present at the Site. Concentrations of tetrachlorethylene (PCE) is present in soil at concentrations below the SWS near the soil and groundwater interface observed between 10 and 15 feet bgs at three locations explored. PCE was also detected in shallow sediments between three and five feet bgs below the SWS on the northwest corner of the site building.

•Lead soil contamination was identified along the northern Site boundary within 70-feet of single-family residential dwellings at concentrations 3.8 to 9.2 times higher than the SWS of 400 mg/kg.

• In the northeast Site boundary adjacent of single-family residential dwelling lead soil contamination was identified 4.4 times higher than the SWS.

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• Lead soil contamination 1.5 times higher than the SWS was identified in the center of the Site.
•Lead soil contamination in surficial sediments was identified along the southern Site boundary, directly adjacent north of a single-family residential dwelling 1.1 to 30 times higher than the SWS.

•Arsenic concentrations exceeding the background concentration were identified on the northwest corner of the Site.

•Arsenic contractions along the north central Site boundary exceeding the background concentrations were also identified.

•Concentrations of SVOC were identified in shallow sediments located on the south side of the lead oxide above ground storage tank. The detected SVOC constituents were below their respective SWS for soil; however, a strong petroleum aroma was sensed from surface samples collected.

•Tetrachloroethylene was identified in several soil samples. Although the concentrations were well below the SWS of 1,500 mg/kg; the potential exist for a vapor intrusion condition into proposed buildings and dwellings at the Site. Further vapor intrusion assessment and/or vapor mitigation engineering controls are recommended for proposed single-family and/or multi-family residential dwellings.

Groundwater Assessment: The distribution of concentrations of VOCs, SVOCs and RCRA metals in groundwater exceeding the SWS have been defined to the Site boundaries. Dissolved lead was identified at the monitoring well located on the southwest corner of the building at a concentration of 31.7 micrograms per liter (µg/L). The concentrations exceed the SWS for protected groundwater sources (15 µg/L). The remaining constituents were below the SWS or below the laboratory reporting limits.

6. <u>Brownfields Site Definition:</u>

The site is (a) not listed or proposed for listing on the National Priorities List; the site is (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and the site is (c) not subject to the jurisdiction, custody, or control of the U.S. government.

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7. Environmental Assessment Required for Cleanup Grant Applications:

- Phase I Environmental Site Assessment, 813 22nd Avenue, April 27, 2020
- Site Investigation and Characterization Assessment, 813 22nd Avenue, conducted on August 17th, 18th, and 19th, 2020.

The Phase I ESA was conducted in accordance with ASTM International (ASTM) E1527-13 Standard Practice (ASTM Standard; ASTM, 2013). The Phase II ESA was conducted in general accordance with ASTM International (ASTM) E1903-11 Standard Practice (ASTM Standard; ASTM 2011) as well as involved extensive on-site sampling and analysis to characterize areas with lead contaminated soils exceeding Iowa's Statewide Standard. The Site Investigation and Characterization Assessment was completed on behalf of the City of Council Bluffs and was conducted in accordance with standard professional practice for site investigations in Iowa.

8. Enforcement or Other Actions:

The City is unaware of any ongoing or anticipated environmental enforcement or other actions related to this site. The City has been in close coordination with IDNR, the agency which would lead and be aware of such enforcement actions.

9. Sites Requiring a Property-Specific Determination:

Not applicable

10. Threshold Criteria Related to CERCLA/Petroleum Liability:

a) Information on Property Acquisition:

i. The City acquired simple title to the property through negotiated agreement with previous owner J S Grant LLC.
ii. The City acquired the site on September 14, 2020. Please see Attachment 7 documentation.
iii. The holds simple title. Please see Attachment 7 for documentation.
iv. The City acquired the property from J S Grant LLC. J S Grant LLC has owned the property since November 20, 2013.
v. The City of Council Bluffs does not have any familial, contractual, corporate, or financial relationships with any prior owners or operators of the property, including J S Grant LLC.

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b) *Pre-Purchase Inquiry:*

i. The City Commissioned a Phase I Environmental Site Assessment that was completed in April 2020 for the Site to provide information for consideration on whether to purchase the Site. The Phase I ESA was conducted in accordance with ASTM International (ASTM) E1527-13 Standard Practice (ASTM Standard; ATSM, 2013). The standard complies with the U.S. Environmental Protection Agency All Appropriate Inquiries Final Rule (40 Code of Federal Regulations [CFR] 312).

ii. The Phase I ESA was conducted fewer than 180 days prior to property acquisition.

c) *Timing and/or Contribution Toward Hazardous Substances Disposal:* Identification of all disposal hazardous substances at the site occurred before the City acquired the property. The City has not caused or contributed to any release of hazardous substances at the site. The City has not, at any time, arranged for the disposal of City-generated hazardous substances at the site or transported hazardous substances to the site.

d) *Post-Acquisition Uses:* Since taking ownership, the City has conducted no business activities at the site, and there is no occupancy. The building always remains closed and locked and is inaccessible to the public.

e) *Continuing Obligations:* Since taking ownership, the City has taken steps to ensure no release or exposure to hazardous substances has occurred or is occurring. The building always remains closed and locked and is inaccessible to the public. The property remains off-limits to the general public.

11. Cleanup Authority and Oversight Structure:

a) *Oversight:* The City does not plan on enrolling the site into the Iowa DNR's Land Recycling Program, or any other state response program. The City will hire, through a competitive bid procurement process, a qualified environmental professional to oversee the cleanup process. A qualified cleanup contractor will be hired through competitive bid process to remove and dispose of lead contaminated soils. The City will also hire, through a competitive bid process a licensed and experienced asbestos abatement contractor. The contractors will be responsible for performance of abatement activities, complying with all applicable local, State and Federal laws, and will provide full documentation and reporting on all abatement and removal activities. The City of Council Bluffs will comply with competitive procurement provisions of 2 CFR 200.317 through 300.326 and ensure that this technical expertise is in place prior to beginning cleanup activities.

b) *Access:* The City has ample access to all areas of the Site necessary for cleanup.

12. Community Notification:

a) *Draft Analysis of Brownfield Cleanup Alternatives:* The City prepared a Draft Analysis of Brownfields Cleanup Alternatives which met the stated criteria and provided it to the public for comment.

b) *Community Notification Ad:* The City published a community notification ad in the local newspaper (*The Daily Nonpareil*) on October X, 2020 and October X, 2020 (Attachment 2). The community notification identified: (1) that a copy of this grant application, including the draft ABCA, was available is located; and (2) how to comment on the draft application; (3) where the draft application is located; and (4) the date and time of a public meeting to discuss and accept comment on the draft application.

c) *Public Meeting:* The City held a public meeting as advertised, on October 12, 2020, on site.

d) *Submission of Community Notification Documents:*

- Attachment 1: Draft ABCA
- Attachment 2: Community Notification Ad
- Attachment 3: Public Meeting Notes; Summary of Comments; Response to Comments
- Attachment 4: Response to Comments
- Attachment 5: Outreach Summation
- Attachment 6: Meeting Sign-in Sheet and Printed Materials

13. Statutory Cost Share:

The City of Council Bluffs will provide the required cost share from Community Development Block Grant funding the City receives annually.