



Community Development Department

1. Applicant Identification

City of Galesburg
55 W Tompkins St
Galesburg, Illinois 61401-4400

2. Website URL: www.ci.galesburg.il.us

3. Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$713,600

4. Location

a) City of Galesburg, b) Knox County, c) Illinois

5. Property Information

Former Knox Laundry – 57 North Kellogg Street / 332 East Ferris Street, Galesburg, Illinois 61401-4400

6. Contacts

a. Project Director

Steve Gugliotta, Director of Community Development
309-345-3637
steveg@ci.galesburg.il.us
55 W Tompkins St
Galesburg, Illinois 61401-4400

b. Chief Executive/Highest Ranking Elected Official

Peter Schwartzman, Mayor
309-877-1988
pschwart@ci.galesburg.il.us
55 W Tompkins St
Galesburg, Illinois 61401-4400

7. Population

City of Galesburg, Illinois: 29,923 (US Census: 2018–2022 American Community Survey)



Community Development Department

8. Other Factors

Other Factors	Page #
Community population is 15,000 or less.	3
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed 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 proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	N/A
The proposed 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.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	N/A
The target area(s) is impacted by a coal-fired power plant has recently closed (2014 or later) or is closing.	NA

9. Releasing Copies of Applications

Not Applicable.



**City of Galesburg, IL
FY25 Brownfields Cleanup Grant
Narrative**

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields i. Overview of Brownfield Challenges and Description of Target Area: The City of Galesburg (City) was founded in 1837 in Knox County. The population boomed in the mid-1850s with the addition of a new Chicago, Burlington, and Quincy railroad line. With the later addition of the Sante Fe Railroad, the City, previously known for agriculture, attracted numerous commercial and manufacturing companies like Purington Brick Company, Admiral Midwest, Maytag, and others. Housing, businesses, and the local economy soared. During the World Wars, Galesburg prospered as its plants provided essential military supplies. With a consistent economic downturn beginning in the early 2000s, industries began closing their doors, creating **significant brownfield challenges**. The City's largest employer, Maytag, left a huge employment gap when it moved all operations to Mexico. As local industry left, many buildings were vacated, dilapidated, and engulfed with potential environmental hazards, hindering revitalization efforts.

The cleanup site is located in **Climate and Environmental Justice Screening Tool (CEJST) Justice40 disadvantaged community census tract 17095000800**, which is part of the **Downtown Corridor (DC) target area**. The **target area** is in the heart of the city and for generations has hosted shops, restaurants, upper-level offices, and residential spaces. The northern section of the corridor is characterized by warehouses. Over the last 20 years, the closing of major manufacturers, warehouses, and the loss of large employers has devastated the area, causing small businesses to shut down due to a lack of family income to support these local businesses. This economic collapse has resulted in abandoned, aged, and dilapidated buildings, such as the cleanup site, causing significant **brownfield challenges** affecting this **Justice40 community** and the sensitive populations of the **impoverished** (41% of all people) and **minorities** (15% Black).¹ The EPA Brownfield funding will be instrumental in assisting with pivotal revitalization efforts by remediating the Former Knox Laundry site, a property with significant residual contamination. This contamination makes private investment in site improvement unlikely, which in turn reinforces the cycle of stagnation and decline in this important corridor of the city. Addressing the contamination and installing much-needed parking infrastructure will address potential health issues posed by the contamination and remove the stigma of this highly visible and underused property in the City's target area.

ii. Description of the Proposed Brownfield Site(s): The **Former Knox Laundry** site located at 57 North Kellogg Street / 322 East Ferris Street is a vacant 0.55-acre site located in the center of the target area. Knox Laundry has been used for retail laundry since at least 1898 ("Steam Laundry" on a Sanborn Map). By the 1990s/2000s, the site had become a significant operation that included a multistory dry cleaning "plant" with a basement, a smokestack, and large dry-cleaning machines. The business ceased operations in the early 2000s, and the buildings, which were in a state of disrepair and neglect, were demolished in 2006/2007 due to safety concerns. The site is adjoined by two churches, with other development in the area consisting of shops and restaurants along with some upper-floor office and residential spaces.

Significant research, assessment, and evaluation of site conditions have taken place using a combination of State of Illinois brownfield funding (Municipal Brownfields Redevelopment Grant Program, Illinois Revolving Loan) and targeted brownfield assessments completed by the Illinois EPA and EPA Region 5. In addition to the dry-cleaning operations, the assessments also evaluated potential contamination due to former oil tanks and nearby auto repair businesses. On-site tetrachloroethylene (PCE), a dry-cleaning compound) had concentrations as high as 1,600

¹ US Census 2018–2022 American Community Survey.

milligrams per kilogram (mg/kg) in soil (compared to the statewide remediation objective of 0.3 mg/kg) and 180 milligrams per liter (mg/L) in groundwater (statewide remediation objective of 0.025 mg/L). Other PCE breakdown (“daughter”) chemicals, like trichloroethylene (TCE), are also present at levels exceeding the statewide remediation objectives by orders of magnitude. Other contaminants from other uses (e.g., former oil tanks, auto repair) were not identified at levels requiring remediation.

Previous investigations from 2008 to 2014 were completed with oversight by Illinois EPA’s Site Remediation Program (SRP). The vertical and lateral extents of contamination were identified at that time, and site-specific remediation objectives were developed. The portion of the site requiring physical remediation consists of an area of soils measuring about 1,000 square feet at a depth of approximately 20 feet below ground surface (bgs). The area is located near the bend of the “backwards L” and along the site boundary with the Trinity Lutheran Church building, which adjoins the site to the northwest. The soil at depth in this area exceeds a site-specific soil saturation concentration (Csat) calculated during previous SRP investigations and approved by the Illinois EPA.

A remedial action plan prepared in 2014 proposed in-situ chemical oxidation combined with engineered barriers supporting site-specific remediation objectives. In 2023, in anticipation of this application, the City requested an investigation from the Illinois EPA’s targeted brownfield assessment team to confirm conditions had not changed significantly. In 2024, the Illinois EPA, through additional investigation activities, concurred conditions had not changed significantly to alter the previously approved remedial approach.

b. Revitalization of the Target Area i. Reuse Strategy and Alignment with Revitalization Plans: The 2019 **Galesburg Comprehensive Plan** (GCP) has individualized plans for each section of the City, labeled as Framework Areas, including the **DC target area**. The GCP describes a detailed vision for the community through 2033 focusing on growth, affordable housing, parks and recreation, economic and workforce development, community health and food sources, **blighted properties and maintenance**, and transportation and **infrastructure**. The City has worked directly with residents and community partners to develop this long-term vision and plan of reinvestment in and redevelopment, showing its dedication and commitment to a successful future for this once-thriving **disadvantaged** area.

The GCP lays out the redevelopment plans for the DC target area with the goals of growing the community’s economy, generating local job opportunities, and revitalizing the downtown. Economic growth begins with sound infrastructure to encourage access to commerce. Redevelopment plans for the **Former Knox Laundry** site include much-needed downtown parking infrastructure enhancements, which have been specifically requested by the adjoining churches and local businesses. As remediation is completed, the required engineered barrier will serve as a parking area for the downtown and provide safe, well-lit parking for families attending services at the two adjoining churches and for downtown businesses and events when church is not in service. Like all City parking lots, the parking created at this site will be free. This vision of needed parking infrastructure is written out in the GCP Goal: **Maintain and promote a positive image and identity for the City** – Objective: “**Support the rehabilitation of older industrial buildings ... including improvements to ... parking areas to accommodate more appropriate and market viable uses.**”

ii. Outcomes and Benefits of Reuse Strategy: The City’s GCP lays out a vision for revitalization and redevelopment efforts through community planning and partnerships. Removal of the blight and redevelopment of the site will have a multitude of positive impacts, with both **noneconomic**

and economic benefits for this designated **Justice40 disadvantaged community** of underserved residents. The new lighting and paved parking infrastructure at the Former Knox site will increase accessibility to downtown businesses and places of worship, allowing for an influx of patrons to increase revenues throughout the City as they visit downtown businesses. **Redevelopment of the site into parking will greatly expand resident access to jobs downtown, which will address the unemployment and low-income issues within the community.** This redevelopment plan will also benefit community health by increasing the City’s foot traffic and walkability.

The City will prioritize **energy-efficient** redevelopment in all aspects of brownfield redevelopment by encouraging **green infrastructure, climate-resilient landscaping, energy-efficiency lighting, and more.** The remediation method selected, in-situ chemical oxidation, is a cleaner and “greener” cleanup method than traditional “dig-and-haul” (excavation and disposal of contaminated soil in a landfill and backfilling with clean soil). With in-situ oxidation, chemicals are injected into the ground to react with the contamination and convert it into harmless byproducts. In contrast, traditional dig-and-haul involves heavy machinery and trucks, typically burning fossil fuels, and takes up limited landfill space.

c. Strategy for Leveraging Resources i. Resources Needed for Site Characterization: As part of previous site investigations under the State of Illinois brownfield funding (Municipal Brownfields Redevelopment Grant Program, Illinois Revolving Loan) and targeted brownfield assessments completed by the Illinois EPA and EPA Region 5, the overall extent and degree of contamination was sufficiently characterized to develop a draft Analysis for Brownfields Cleanup Alternatives (ABCA) with a preferred cleanup approach. The City does not anticipate needing more funding for further characterization of the site and is ready to proceed to cleanup; however, should additional assessment funding be deemed necessary, the City will work with the state programs once again to conduct the additional assessments.

ii. Resources Needed for Site Remediation: EPA Grant funding requested in this application will be sufficient to complete the remediation of the Former Knox Laundry. The City will spearhead the cleanup process and hire an environmental contractor to manage and implement remediation efforts. The cost of the required cleanup does not fit into the City’s limited available funding for site redevelopment. The partnership with the EPA will fulfill the City’s goal of remediation and allow it to move on to the reuse phase of development.

iii. Resources Needed for Site Reuse: The redevelopment of the Former Knox Laundry site into a paved parking area in the heart of downtown will be funded by this Cleanup Grant. The required barrier that will be put in place as part of the remediation will serve as the parking lot. Additional paving of the site over “clean” areas plus the lighting, landscaping, and striping needed to complete the site-reuse vision will be funded via the TIF District and Public Works Department budgets.

iv. Use of Existing Infrastructure: The City intends to use existing infrastructure at the cleanup site, including water/sewer, transportation, and power. The City has the necessary infrastructure to fully support the proposed redevelopment of the target-area cleanup site. Additional funding needed for the installation of lighting and pavement will be funded through the TIF District.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need i. The Community’s Need for Funding: The cleanup site is in one of three CEJST Justice40 census tracts that make up the City’s **Downtown Corridor (DC)** target area. The DC cleanup target area has a **small population of 2,513** with extremely low incomes.² The **median household income is 4.5 times less than the national average at \$16,683 (US \$75,149) and the per capita income is \$11,911 (US \$41,261).**² On average, **41% of target-area residents fall**

² US Census: 2018–2022, American Community Survey.

below the poverty line, more than three times the US rate (13%).³ According to the CEJST, the target area is in the **90th percentile where the share of people in the household's income is at or below 100% of the federal poverty level**. The City recognizes the need to address the cleanup site due to public health and environmental concerns that have already been identified. However, the City's operating budget is focused on other necessary expenditures and services for residents, such as police, fire department, and water services. The City's water infrastructure has been draining the City budget recently because the City owns its water system and is working to make upgrades throughout the city. Assistance from the EPA Brownfield Cleanup Grant will allow the City to remediate the confirmed contaminants at the site and make way for redevelopment within the city center core.

ii. Threats to Sensitive Populations (1) Health or Welfare of Sensitive Populations: The **target area** faces many welfare challenges, including blight, low income, high unemployment rates, and environmental concerns. **Sensitive populations within the target area include Black minorities and those living below the poverty line**. The sensitive population averages show the vulnerability of the target-area population: **Black minorities (15%, US 13%), female led households in poverty (97%, US 24%), and all families with kids under the age of 18 (54%, US 14%)**.³ On average, **45% of people within the target area received food stamps/SNAP benefits in the last 12 months (US 12%)**.³

The target area also suffers from several wellness issues such as high unemployment, low educational attainment, and the need for local job opportunities. Within the target area, the number of **unemployed residents is in the 81st percentile** per CEJST and the **78th percentile for individuals without high school diplomas** per the EJ Screening Tool. Low education levels can equate to higher crime rates. The City ranks **higher than average for violent (24.5, US 22.7) and property (42.7, US 35.4) crimes** compared to the nation.⁴ The addition of safe parking infrastructure will allow underserved residents better access to employment opportunities downtown. Further revitalization of the DC target area will **create jobs, grow small businesses, and protect property values**, all while cleaning up the blighted and abandoned areas and contributing to an increase in the overall health of the City's impoverished population.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Residents of the target area are economically distressed and live with a greater risk of health issues caused by negative environmental conditions and **disinvestment in their underserved communities**. The target area has sensitive populations who face **cancer and asthma** risks due to the related environmental concerns and hazards prevalent in its brownfield sites. Confirmed contaminants at the site, **volatile organic compounds (VOCs)**, are causes for concern that can affect the residents' health as they are known carcinogens. Specifically, PCE, the primary contaminant, is a probable carcinogen and has noncarcinogenic neurotoxic effects as well as negative impacts to the liver and kidneys. Its breakdown products, which are also present at the site, include known carcinogens like trichloroethylene (TCE) and vinyl chloride, as well as toxic noncarcinogens like cis-1,2-dichloroethylene. The PCE remediation will also address residual concentrations of these breakdown products.

The **target area** faces daily challenges from asthma-related illnesses, shown by their ranking in the **95th percentile for people who have been told they have asthma**.⁵ Asthma prevalence in women is nearly two times higher than in males (11.1% vs. 6.3%), highest in the non-Hispanic

³ US Census: 2018–2022, American Community Survey.

⁴ www.bestplaces.net/crime/city/illinois/galesburg.

⁵ EJ Screening Tool.

Black population (14.4%), and highest among those in low-income brackets (13.5%).⁶ The target area also demonstrates extreme health concerns with a **92nd percentile ranking for low life expectancy and 70th percentile for heart disease.**⁷ The risk of cancer is also elevated in the target area. The county (target-area data not available) has an **elevated cancer mortality rate of 473/100k** compared to the Illinois rate of 459/100k (US 442/100k).⁸ The cancer rate among men was even higher at 483/100k per the Illinois Department of Public Health in Knox County. **Birth defects within the county are also a concern.** The rate of **major central nervous system birth defects** (56/100k) and **genitourinary tract birth defects** (56/100k) are higher than the state rates (24/100k, 45/100k).⁹ Contaminants found at the cleanup site can have a great impact on these lingering health issues. Without the EPA Brownfield Grant funding for remediation, contaminants will magnify these health conditions. However, by addressing the site and the environmental concerns, the revitalization process will spur generations of healthier growth for these sensitive populations.

(3) Environmental Justice (a) Identification of Environmental Justice Issues: The cleanup site is located in a **Justice40 disadvantaged community as defined by CEJST**. The City understands that to address the Justice40 Initiatives in these **CEJST disadvantaged census tracts** that make up the **DC target area**, it must address the underinvestment in abandoned, vacant brownfield properties. These properties have been vacant for many years, which has led to the need for cleanup due to environmental and health concerns in the area. An EPA Brownfield Grant will improve conditions in the area and provide a brighter future for the target area, which suffers from **persistent poverty, high unemployment rates, and extremely low incomes**. It's clear this **distressed** community deserves a brighter future. The **EJ Screening Tool** shows the target area ranks in the **97th percentile for low income, 82nd in unemployment, and 76th percentile for less than a high school education**, demonstrating the extreme socioeconomic conditions in this community. Add in the target area's environmental issues, such as **86th percentile for lead paint, 93rd percentile for underground storage tank proximity, 91st percentile for Superfund proximity, and 92nd for wastewater discharge**, and the remediation need becomes even more evident for this disadvantaged community.⁷ Galesburg has the opportunity to address these needs by using the grant money to spur economic development within the DC target area, which will then help inject growth back into the community.

(b) Advancing Environmental Justice: The **DC target area** is identified as part of the **Justice40 Initiative** and is home to **stressed minority and other sensitive populations** with high levels of poverty and environmental burdens. The planned redevelopment of the cleanup site into a safe, paved parking lot in the heart of downtown will enhance the health and well-being of **disadvantaged and underserved** residents and remedy many environmental and socioeconomic justice issues affecting them. The cleanup site is currently abandoned and vacant; therefore, **no displacement of businesses or residents will occur**.

b. Community Engagement i. Project Involvement & ii. Project Roles

Name of Organization & Mission	Point of Contact	Specific involvement or assistance provided
Galesburg Chamber of Commerce, 501(c)(3) – Support regional economic vitality and	Pam Gaither Exec. Director	Assisting/Decision Making: future reuse planning

⁶ Illinois Asthma State Plan.

⁷ EJ Screening Tool.

⁸ National Cancer Institute: www.statecancerprofiles.cancer.gov.

⁹ Knox Co Health Improvement Plan <https://cms5.revize.com/revize/knox/Knox%20County%20Health%20Improvement%20Plan%202021-2026.pdf>.

development by promoting the health and growth of business	pgaither@galesburg.org	
Downtown Community Partnership, 501(c)(3) – Build bridges of collaboration between small businesses, local organizations, and residents for inclusive progress, innovation, and community engagement	Kate Bullis President president@dcpofgalesburg.org	Assisting/Decision Making: future reuse and community outreach and education
Knox County Area Partnership for Economic Development – Foster a diversified and resilient economy by launching, locating, and growing businesses in the county	Ken Springer President ken@knoxpartnership.com	Assisting/Decision Making: future reuse planning
Galesburg Rotary Club – Provide service to others, promote integrity, advance world understanding, goodwill, and peace through fellowship of business, professional, and community leaders	Tom Simkins Lead, Community Service Projects [REDACTED]	Assisting/Decision Making: community outreach
Trinity Lutheran Church, 501(c)(3) – Work hand in hand with the Galesburg community sharing God’s grace and reaching out to welcome, encourage, and serve all	Carrie Carnes Pastor pastor@trinitygalesburg.org	Assisting/Decision Making: meeting space, community outreach

iii. Incorporating Community Input: The City informed the public of their intent to pursue an EPA Brownfield Cleanup Grant for the Former Knox Laundry site at the City Council meeting held on August 5, 2024. Galesburg understands working closely with community members is the key to implementing a successful Brownfield Program. A public meeting to fulfill the community notification requirements of the EPA Brownfield Cleanup Grant was publicized on September 18th and held in the evening on October 1, 2024, to solicit community feedback on the draft grant application and draft ABCA. The City will cultivate productive and thought-provoking interactions between target-area residents and community organizations. The City will continue to seek valuable input from residents and community organizations, as they are the most aware of where its most important needs lie. Upon receiving a grant award, the City will create a Community Involvement Plan (CIP) that will provide an event schedule, an outline of planned community engagement activities, a project background, and a list of key players. The CIP will be made available for review at City Hall and on the City’s website and will ensure engagement with the underserved community.

The City will perform community outreach through educational meetings, project partners, social/digital media, and local news and radio outlets. The Brownfield Project Team will review and evaluate comments received from the community during quarterly meetings, record all community member suggestions and information in the minutes, and post them on the City’s Brownfield Program webpage. The City will respond to comments received from the community during their next planned community meeting. Depending on the nature of the comment, the City may supplement its response with additional information on its program webpage.

The City’s CIP will incorporate several forms of media. Brownfield Program updates will be posted to the City’s Facebook page in addition to the City’s Brownfield Program webpage. The City will provide resident **interaction via website and social media as a supplement to in-person community engagement**. The City will disseminate Brownfield Project information through signage in government buildings, press releases, email blasts, and local newspapers for those without access to the internet. Citizens and project partners will be updated during City Council meetings, community education meetings held throughout the target area, and

charrettes/visioning sessions. All promotional materials and the names and contact information of the City's Brownfield Program Team will be posted on the City's brownfield webpage, facilitating community-members contact with Brownfield Project Team members.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: The Illinois EPA-approved remedial action consists of the injection of a sodium permanganate solution (40%) into the ground in the area of impacted soil (above the soil saturation concentration). The solution would be injected over the 17- to 23-foot depth interval using 45 injection wells installed for this purpose. When the treatment chemicals contact contaminated soil or groundwater, a chemical reaction occurs, with byproducts of heat and nonhazardous chemicals (carbon dioxide (CO₂), water (H₂O), and inorganic chloride). The treatment includes two follow-up treatments to help ensure effective dispersal of the treatment chemicals throughout the impacted area.

Confirmation sampling consisting of at least three soil borings, with sampling in the previously impacted zone, is a required element of the Remedial Action Plan (RAP). The soil samples will be collected from a depth of 20 feet bgs and analyzed for PCE. The concentrations will be compared to the approved site-specific remediation objective of 1,441 mg/kg PCE. The borings will be converted to soil-gas monitoring wells in order to evaluate post-remediation considerations of the vapor intrusion pathway into the Trinity Lutheran Church. Samples will be collected 6 months and, if needed, 12 months and 18 months (if follow-up treatments are necessary) after the remediation activities. After completion of the injection activities and confirmation sampling, the area will be paved as required for an engineered barrier and as planned by the City for redevelopment. Approximately 2,500 square feet of pavement is required for an engineered barrier.

b. Description of Tasks/Activities and Outputs

Task 1: Outreach	
i	<i>Project Implementation:</i> The City's Brownfield (BF) Project Director will develop a Community Involvement Plan (CIP), outreach materials, BF Project website, and social media posts with the assistance of the environmental contractor (EC). City staff will lead the community meetings to keep the public informed on project plans and updates. Supplies are budgeted for the printing of outreach materials (brochures/handouts), notebooks, paper, pens, other miscellaneous office supplies to manage the grant.
ii	<i>Anticipated Project Schedule:</i> CIP created Q1. Community educational meetings held Q2 Y1-4. Website/outreach materials created Q1 and posted quarterly throughout the grant.
iii	<i>Task/Activity Lead:</i> City: Steve Gugliotta, Director of Community Devp., BF Project Director
iv	<i>Outputs:</i> CIP, Brownfield website, 4 community meetings, brochures/handouts, social media posts, summary of community meetings in EPA-required quarterly reports.
Task 2: Programmatic Support	
i	<i>Project Implementation:</i> The City will procure an EC to assist with the BF Grant Project. The City's BF Project Manager oversees grant implementation and administration to ensure compliance with the EPA Cooperative Agreement Work Plan, schedule, and terms and conditions. The EC will assist the City in completing ACRES database reporting, yearly financial reporting, quarterly reporting, MBE/WBE forms, and all additional programmatic support for the four-year term of the grant. City staff travel budget allows for two staff to attend two brownfield training conferences/workshops.
ii	<i>Anticipated Project Schedule:</i> EC procured Q1. ACRES & quarterly reporting begins Q1 and continues throughout the grant. Annual reporting and forms created Q5, Q9, Q13 and final closeout.

iii	<i>Task/Activity Lead:</i> City: Eric Heiden, Code Compliance Supervisor, BF Project Manager
iv	<i>Outputs:</i> ACRES database reporting, 4 annual financial reports, 16 quarterly reports, 4 MBE/WBE forms, programmatic support for the grant period. Two staff to attend two conferences.
Task 3: Cleanup/Reuse Planning	
i	<i>Project Implementation:</i> The City's BF Project Director will oversee the EC as they finalize the ABCA and prepare the QAPP and Health and Safety Plan (HASP). National Historic Preservation Action Section 106 consultation will be addressed when applicable. The BF Project Director will participate in the visioning session with the EC to determine landscaping and the final layout of the redeveloped site.
ii	<i>Anticipated Project Schedule:</i> The finalized ABCA and approved QAPP/HASP are anticipated within six months of procuring/contracting with an EC. The visioning session will occur within six months following issuance of a No Further Remediation (NFR) letter from the Illinois EPA.
iii	<i>Task/Activity Lead:</i> The EC will handle the technical aspects of the project with oversight from City: Steve Gugliotta, Director of Community Development, BF Project Director.
iv	<i>Outputs:</i> 1 ABCA, 1 Site-Specific QAPP & HASP, 1 vision session
Task 4: Cleanup	
i	<i>Project Implementation:</i> The City's BF Project Director will oversee the EC as they manage the proposed site-cleanup activities including contractor mobilization, contractor oversight, cleanup reporting, and post-remediation confirmation sampling.
ii	<i>Anticipated Project Schedule:</i> Cleanup activities are anticipated to begin within 3 months of EPA Region 5 approval of the QAPP/HASP. In-situ injection, construction of the engineered barrier (pavement/lot), and confirmation sampling is anticipated to require up to 12 months to complete. The project is expected to require up to 24 months.
iii	<i>Task/Activity Lead:</i> The EC will handle the technical aspects of the project with oversight from City: Steve Gugliotta, Director of Community Development, BF Project Director.
iv	<i>Outputs:</i> 1 site ready for reuse, 1 Remedial Action Completion Report, 5 remediation jobs for the duration of the activities
Task 5: Cleanup Oversight	
i	<i>Project Implementation:</i> The City's BF Project Director will oversee the EC as they conduct post-remediation confirmation soil sampling and reporting to the Illinois EPA.
ii	<i>Anticipated Project Schedule:</i> The EC will conduct confirmation sampling approximately six months following injection activities. If the results indicate that second, and potentially third, injection events are required, the EC will conduct confirmation sampling approximately six months following each injection event. Closure documentation is expected to be submitted to the Illinois EPA within two months of confirmation sampling meeting site-specific objectives, with an NFR letter issued within two months of approval of the Remedial Action Completion Report.
iii	<i>Task/Activity Lead:</i> The EC will handle the technical aspects of the project with oversight from City: Steve Gugliotta, Director of Community Development, BF Project Director.
iv	<i>Outputs:</i> 1 NFR letter for the site, 1 Remedial Action Completion Report

c. Cost Estimates: The following are the anticipated cost estimates for this project *based on past brownfield projects as determined by local market standards with contractual hourly rates based on the skills needed for the specific tasks*. The budget for this project includes travel, supplies and contractual costs only. All work will be conducted in adherence with Davis Bacon guidelines.

Task 1 Outreach: Contractual: Community Involvement Plan \$3,900 (26 hrs x \$150), Brownfield website, outreach brochure/handouts, social media posts \$3,000 (20 hrs x \$150), 4 Community

education meetings \$5,400 (36 hrs x \$150; \$1,350/meeting). Supplies: \$2,000 (printed brochures \$900 [900 x \$1.00]; printed display boards \$600 [10 x \$60]; notebooks, paper, pens, other office supplies \$500). **Task 2 Programmatic Support:** Contractual: ACRES database reporting, yearly financial reporting, quarterly reporting, MBE/WBE forms, programmatic support for the four-year grant period \$9,900 (66 hrs x \$150). Travel: Two staff to attend two conferences \$8,400 (flights at \$800, 3 nights in hotel at \$300 each, incidentals and per diem at \$100 per day x four days for 2 attendees x 2 conferences). **Task 3 Planning:** Contractual: 1 ABCA \$7,500; 1 Site-Specific QAPP \$5,500; 1 vision session \$3,000. **Task 4 Cleanup:** Construction: \$580,000 total for three rounds of in-situ chemical oxidation injection and pavement \$295,000 (\$130,000 for remediation chemicals and delivery, \$145,000 for field labor, \$20,000 for specifications and installation of pavement [2,500 square feet at \$6/sf and \$5,000 for pavement cross section design]) and \$285,000 for mobilization and operation of injection equipment, installation safety fencing, and field expendable supplies. **Task 5 Cleanup Oversight:** Contractual: \$85,000 (\$60,000 for three post-confirmation sampling events [3 events, each with 2 days sampling rig at \$2,800/day, 3 staff and 2 days per diem at \$100/day/person, 12 samples at \$250/sample, 72 hrs fieldwork and reporting at \$150/hr], \$7,500 for Remedial Action Completion Report [50 hrs at \$150/hr], \$17,500 for Illinois EPA program fees and closeout documentation [\$2,500 NFR Letter Fee, 100 hrs at \$150/hr]).

Category	Tasks					Totals
	<i>Outreach</i>	<i>Programmatic Support</i>	<i>Planning</i>	<i>Cleanup</i>	<i>Cleanup Oversight</i>	
Travel		\$8,400				\$8,400
Supplies	\$2,000					\$2,000
Contractual	\$12,300	\$9,900	\$16,000		\$85,000	\$123,200
Construction				\$580,000		\$580,000
Total Budget	\$14,300	\$18,300	\$16,000	\$580,000	\$85,000	\$713,600

d. Plan to Measure and Evaluate Environmental Progress and Results: To ensure this EPA Brownfield Cleanup Grant is on schedule, the City's Brownfields Team, which will include the EC, will meet quarterly to track all **outputs identified in 3.b.** using an Excel spreadsheet. The City will report progress to the EPA via quarterly reports, and project expenditures and activities will be compared to the project schedule to ensure the project will be completed within the four-year time frame. Site information will be entered and tracked in the ACRES database. Outputs to be tracked include QAPP, ABCA, contractor procurement, quarterly, annual, and closeout reports, and the number of community meetings. The outcomes to be tracked include community participation, acres ready for reuse, redevelopment dollars leveraged, and jobs created. In the event the project is not progressing efficiently, countermeasures are in place to address the problem, which include making monthly calls to the EPA Project Officer and, if needed, revising the existing Work Plan to get back on schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability i. Organizational Structure & ii. Description of Key Staff: The City operates under a mayor-council form of municipal government. The City has the organizational capacity to handle a project through the office of the City Administrator with the support from the City's government officials (City Council) led by the mayor. The City's Community Development office will handle the grant and has a long, successful history of grant and project management for the City. The Community Development office manages 25-plus grants a year, from federal, state and local entities. The Director of Community Development, **Mr. Steve Gugliotta**, will be the **Brownfield Project Director**. Mr. Gugliotta has been with the City for over 26 years but has been

the Director of Community Development since 2021. He is responsible for overseeing economic development, zoning, historic preservation, public transit, construction inspections, and housing grants. In Mr. Gugliotta's previous roles with the City, he was a Planning Manager, Associate Planner, and Building Inspector. **Mr. Eric Heiden**, Code Compliance Supervisor, will be the **Brownfield Project Manager**. Mr. Heiden has served in his role as Code Compliance Supervisor for almost 3 years. In his current role, his responsibilities include grant management, supervision of Construction Inspectors, and buildings and grounds oversight. Mr. Gugliotta and Mr. Heiden will be assisted by **Ms. Jennifer O'Hern**, Director of Finance and City Treasurer, who will serve as the **Brownfield Finance Director**. Ms. O'Hern has over 16 years of experience in all areas of governmental finance. Ms. O'Hern will be responsible for managing the finances of this grant as well as draw downs through ASAP.gov. A qualified environmental contractor will be used to ensure technical and reporting aspects of the grant implementation are completed accurately.

iii. Acquiring Additional Resources: Using local contracting requirements and procurement process, the City will procure a qualified environmental contractor to assist with technical and reporting portions of the Brownfield Cleanup, in addition to any other contractors needed to complete the project. The City will ensure compliance with the EPA's "Professional Service" procurement process. Redevelopment will emphasize the growth in the DC target area, creating local jobs for residents. During redevelopment activities, temporary construction jobs will be created and available to residents who work in that field. The City recognizes the importance of ensuring that the benefits of this grant extend beyond environmental improvement to meaningful economic and social impacts for the community. The City is committed to fostering strong labor practices, supporting local hiring and procurement by partnering with local hiring organizations, and creating educational and workforce opportunities for all.

b. Past Performance and Accomplishments ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (1) Purpose and Accomplishments: In January 2020, the City received a \$175,000 grant from the Illinois Housing Development Authority (IHDA) Strong Communities Program that funded 12 city-initiated demolitions of blighted buildings. The grant was fully drawn down and successfully completed in December 2021. In March 2023, the City was awarded \$400,000 from IHDA's Home Repair and Accessibility Program. This grant has funded five residential home renovation projects and will assist in at least four more before grant closeout in March 2025. Renovations bring the homes up to code and add improved basic living conditions for residents. This grant will assist at least nine local families. The City was awarded \$562,000 by the IHDA Strong Communities Program in November 2023. The grant will fund at least 22 city-initiated demolitions of blighted buildings before grant closeout. The grant will closeout in November 2025.

(2) Compliance with Grant Requirements: The City has a history of compliance with grant work plans, schedules, and terms and conditions, and has an excellent history of timely reporting with all award agencies. The City successfully completed the 2020 IHDA grant on time and in full compliance. The City is on schedule with all current grants, including both of the IHDA demolition and renovation grants, which are scheduled to close out in 2025. The Brownfield Project Team is skilled in project management and will monitor all grant activities to ensure compliance with all financial reporting requirements.



**City of Galesburg, IL
FY25 Brownfields Cleanup Grant
Threshold Criteria**



Threshold Criteria

1. Applicant Eligibility

- a) The City of Galesburg, Illinois, is eligible to apply for the EPA Brownfields Cleanup Grant as a unit of local government as defined under 2 CFR § 200.1.
- b) The City of Galesburg, Illinois, is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The City affirms the Former Knox Laundry site, located at 57 North Kellogg Street / 332 East Ferris Street, has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The City affirms it does not have an open Multipurpose Grant.

4. Site Ownership

The City acquired the property through purchase on **August 6, 2024**, and has fee simple title through recorded deed.

5. Basic Site Information

- a) Site Name: Former Knox Laundry
- b) Site Address: 57 North Kellogg Street / 332 East Ferris Street, Galesburg, Illinois 61401-4400

6. Status and History of Contamination at the Site

- a) The site is contaminated with hazardous substances.
- b) Portions of the site have been used for retail laundry since at least 1898 (“Steam Laundry” on a Sanborn Map). By the 1990s/2000s, the site had become a significant operation that included a multistory dry-cleaning “plant” with a basement, a smokestack, and large dry-cleaning machines. The business ceased operations in the early 2000s, and the buildings, which were in a state of disrepair and neglect, were demolished in 2006/2007 due to safety concerns. The gravel- and grass-covered site currently sits vacant and is occasionally used for parking by churchgoers and downtown visitors.
- c) Significant research, assessment, and evaluation of site conditions have occurred using a combination of State of Illinois brownfield funding (Municipal Brownfields Redevelopment Grant Program, Illinois Revolving Loan) and targeted brownfield assessments completed by the Illinois Environmental Protection Agency (IEPA) and EPA Region 5. In addition to the dry-cleaning operations, the assessments also evaluated potential contamination due to former oil tanks and nearby auto repair businesses. On-site tetrachloroethylene (PCE, a dry-cleaning compound) concentrations are as high as 1,600 milligrams per kilogram (mg/kg) in soil (statewide Tier 1 remediation objective is 0.3 mg/kg) and 180 milligrams per liter (mg/L) in groundwater (statewide Tier 1 remediation objective is 0.025 mg/L). Other PCE breakdown (“daughter”) chemicals, like trichloroethylene (TCE), are also present at levels exceeding the remediation objectives by orders of magnitude.



- d) Contamination at the site is due to historical releases (over many decades) from past dry-cleaning operations. The overall vertical and lateral extents of contamination have been identified and are widespread over most of the site. Risk-based controls proposed in a Remedial Action Plan (RAP) approved by the Illinois EPA have resulted in a smaller area requiring treatment: an area of deep (approx. 20 feet) soils with PCE impact above soil saturation levels.^{1,2}

7. Brownfields Site Definition

The City affirms the site is:

- a) NOT listed (or proposed for listing) on the National Priorities List (NPL);
- 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
- c) NOT subject to the jurisdiction, custody, or control of the US government.

8. Environmental Assessment Required for Cleanup Grant Applications

Many reports have been prepared for the site. The following are the primary reports containing the complete history and data for the site.

- Phase I Environmental Site Assessment (ESA) – December 5, 2007
- Comprehensive Site Investigation Report—Remediation Objectives Report—Remedial Action Plan – July 7, 2014
- Brownfield Site Reevaluation – October 27, 2023
- Phase I ESA – April 19, 2024

9. Site Characterization

a) Not Applicable.

b) The Former Knox Laundry site located at 57 North Kellogg Street / 332 East Ferris Street is currently enrolled in a state voluntary response program (Illinois EPA Site Remediation Program, or SRP). A letter from the SRP is included in this application that:

- i. affirms that the site is eligible to be enrolled in the SRP;
- ii. indicates that the site can remain enrolled in the SRP for brownfield regulatory oversight purposes; and
- 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.

c) Not Applicable.

10. Enforcement or Other Actions

The City affirms there are not any ongoing or anticipated environmental enforcement actions relating to the property at 57 North Kellogg Street / 332 East Ferris Street.

¹ Terracon (July 2014). Comprehensive Site Investigation Report-Remediation Objectives Report-Remedial Action Plan, Former Knox Laundry, Galesburg, Illinois. July 7, 2014.

² Illinois EPA (October 2023). Brownfield Site Reevaluation, Knox Laundry, Galesburg, Illinois. October 27, 2023.



11. Sites Requiring a Property-Specific Determination

The City affirms that the Knox Laundry site located at 57 North Kellogg Street / 332 East Ferris Street does not require property-specific determination to be eligible for EPA Brownfields Grant funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a) Property Ownership Eligibility – Hazardous Substance Sites

i. **EXEMPTIONS TO CERCLA LIABILITY** – Not Applicable.

ii. **EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY** – Not Applicable.

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition

- (i) The City acquired the property by negotiated purchase from the Knox County Trustee.
- (ii) The City acquired the property on **August 6, 2024**.
- (iii) The City is the sole owner of the property and has fee simple title.
- (iv) The City purchased the property from the previous owner: Knox County Trustee.
- (v) The City does NOT have familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators of the site.

(b) Pre-Purchase Inquiry

- (i) Several environmental site assessments were performed prior to the City's purchase of the property. The following are the primary documents detailing and summarizing the prior assessments. Each of these assessments were performed directly for the City.
 - Phase I ESA – December 5, 2007
 - Comprehensive Site Investigation Report—Remediation Objectives Report—Remedial Action Plan – July 7, 2014
 - Brownfield Site Reevaluation – October 27, 2023
 - Phase I ESA – April 19, 2024
- (ii) Terracon Consultants, Inc., performed the most recent Phase I ESA. The Phase I ESA was performed under the supervision/direction of Brian Porter (Senior Engineer), who meets the definition of Environmental Professional as defined in Section 312.10 of 40 CFR at the time of the report.
- (iii) Not Applicable.

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

All disposal of hazardous substances at the site occurred before the City acquired the property. The City has not caused or contributed to the release of any hazardous substances on the property. The City has not, at any time, arranged for the disposal of hazardous substances at the property or transported hazard substances to the property.



(d) Post-Acquisition Uses

The property has not been used by the City since taking ownership on August 6, 2024. The gravel- and grass-covered site currently sits vacant and is occasionally used for parking by churchgoers and downtown visitors.

(e) Continuing Obligations

(i) There are no known continuing releases at this time. Based on the planned cleanup and reuse of the site and typical SRP requirements, any residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions, thus fulfilling the City's continuing obligations regarding current releases of known hazardous substances found at the site.

(ii) The City will exercise appropriate care with hazardous substances found at the site by taking reasonable steps to prevent any future releases. No business operations have taken place at the site since the former business tenant (Knox Laundry) ceased operations at the site in 2007. The City demolished and removed all structures from the site later the same year. No chemicals are currently stored at the property, and the property is vacant and without structures. Terminating business operations and removing former structures from the site has stopped the potential for any continuing releases, prevents any threatened future releases, and prevents exposure to the previously released hazardous substances below the surface. The planned cleanup activities will further prevent exposure to contaminants by users of the site and adjoining properties. The City intends to use Cleanup Grant funds to treat impacted soils contaminated above the soil saturation limit, require vapor mitigation systems for any future buildings constructed on the site (currently not planned), and to install an engineered barrier (pavement) over portions of the site to effectively limit exposure potential and the potential for future releases associated with impacted site media. Based on the planned reuse of the site and typical requirements of the SRP, residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions, thus fulfilling the City's continuing obligations regarding future releases of known hazardous substances found at the site.

(iii) By preventing excavations at the site and through the City's groundwater use ordinance, the City has prevented or limited exposure to any previously released hazardous substances. The planned cleanup activities will further prevent and limit exposure to previously released hazardous substances. The City intends to use Cleanup Grant funds to treat impacted soils contaminated above the soil saturation limit, require vapor mitigation systems for any future buildings constructed on the site (currently not planned), and to install an engineered barrier (pavement) over portions of the site to effectively limit exposure potential and the potential for future releases associated with impacted site media. Based on the planned reuse of the site and typical requirements of the SRP, residual impacts to soil and groundwater remaining after cleanup activities will be managed through deed restrictions, thus fulfilling the City's continuing obligations regarding preventing and limiting exposure to past releases of known hazardous substances found at the site.



The City confirms its commitment to:

- (i) comply with any necessary land use restrictions and not impede the effectiveness or integrity of any institutional controls;
- (ii) assist and cooperate with those performing the cleanup and provide access to the property;
- (iii) comply with information requests and administrative subpoenas that may be issued in connection with the property; and
- (iv) provide all legally required notices.

iv. SITES WITH HAZARDOUS BUILDING MATERIAL THAT IS NOT RELEASED INTO THE ENVIRONMENT – Not Applicable.

13. Cleanup Authority and Oversight Structure

The City will comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment.

a) The City intends to maintain enrollment in the SRP, through which the Illinois EPA will provide cleanup authority and oversight to ensure the remediation is protective of human health and the environment. The City will hire a qualified environmental contractor prior to implementing remediation activities. The contractor will provide the technical expertise required to conduct, manage, and oversee the cleanup. The City will comply with competitive procurement provisions of 2 CFR §§ 200.317 through 200.327 and ensure that this technical expertise is in place prior to beginning cleanup activities.

b) The site is bounded to the west by the Trinity Lutheran Church, a historic structure with a basement. Because the church has worked with the City and allowed access for sampling within the basement during previous assessment activities, the City does not anticipate difficulty obtaining access to the property for these purposes. Other off-site remediation or assessment activities are not proposed or anticipated based on the Remedial Action Plan approved by the Illinois EPA (Terracon, 2014).

14. Community Notification

a) Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

The City announced their intent for cleanup funding for the Knox Laundry site located at 57 North Kellogg Street / 332 East Ferris Street and the proposed redevelopment on **September 18, 2024**. A draft ABCA for the site and a draft application were made available at that time for public review and comment. These documents summarize information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered; and
- the proposed cleanup.

b) Community Notification Ad

A request for public input was published on **September 18, 2024**, in the *Galesburg Register-Mail*. A copy of this grant application and a draft ABCA was made available for public review and comment.



c) Public Meeting

The draft application and ABCA were discussed during an in-person public hearing on **October 1, 2024, at 6:00 p.m. Central Time**. The City documented participant attendance at the meeting.

d) Submission of Community Notification Documents

The following community notification documents are included as an attachment to this proposal:

- a copy of the draft ABCA;
- a copy of the ad that demonstrates notification to the public and solicitation for comments on the application and that notification to the public occurred at least **14 days** before the application was submitted to the EPA.
- a copy of the meeting attendance sheet and meeting agenda.
- The City received one public comment during the public meeting. The meeting sign-in sheet and notes recorded by the City Clerk are attached. The one commenter indicated that he would prefer alternative redevelopments other than the parking feature currently proposed.

15. Contractors and Named Subrecipients

Not applicable.



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217/785-8726

10/2/2024

City of Galesburg
ATTN: Steve Gugliotta
Director of Community Development
55 W. Tompkins St.
Galesburg, IL 61401-4400

**Subject: State Acknowledgement Letter for the City of Galesburg
FY2025 US EPA Brownfield Cleanup Grant Application**

Dear Mr. Gugliotta,

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. The City of Galesburg is applying for a \$713,600 Cleanup Grant.

The grant will be a Cleanup Grant for Hazardous Substances and will be used on a site located at 332 East Ferris Street, Galesburg, IL. 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 City of Galesburg'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.

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



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PLEASE PRINT ON RECYCLED PAPER