



City Planning and Development Department

Long-Range Planning Division – Brownfields Office

16th Floor, City Hall
414 E. 12th Street
Kansas City, Missouri 64106-2795

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NARRATIVE INFORMATION SHEET

1. Applicant Identification: City of Kansas City, Missouri
414 E. 12th Street
Kansas City, Missouri 64106
2. Website URL: <https://www.kcmo.gov>
3. Funding Requested:
 - a. Grant Type: Multiple Site Cleanup
 - b. Federal Funds Requested \$4,000,000
4. Location:
 - a) City: Kansas City, Missouri
 - b) County: Jackson County, Missouri
 - c) State: Missouri
5. Property Information:

Site 1 - Vacant Lots Site

1822 Agnes Avenue, Kansas City, MO 64127
1824 Agnes Avenue, Kansas City, MO 64127
1826 Agnes Avenue, Kansas City, MO 64127
1832 Agnes Avenue, Kansas City, MO 64127
1834 Agnes Avenue, Kansas City, MO 64127
1844 Agnes Avenue, Kansas City, MO 64127
1846 Agnes Avenue, Kansas City, MO 64127
1903 Agnes Avenue, Kansas City, MO 64127
1905 Agnes Avenue, Kansas City, MO 64127
1907 Agnes Avenue, Kansas City, MO 64127
1909 Agnes Avenue, Kansas City, MO 64127
1911 Agnes Avenue, Kansas City, MO 64127
1913 Agnes Avenue, Kansas City, MO 64127
1915 Agnes Avenue, Kansas City, MO 64127
1917 Agnes Avenue, Kansas City, MO 64127
1919 Agnes Avenue, Kansas City, MO 64127
1912 Walrond Avenue, Kansas City, MO 64127

2000 Walrond Avenue, Kansas City, MO 64127
3005 East 19th Street, Kansas City, MO 64127
3007 East 19th Street, Kansas City, MO 64127
3009 East 19th Street, Kansas City, MO 64127
3009B East 19th Street, Kansas City, MO 64127
3011 East 19th Terrace, Kansas City, MO 64127
3013 East 19th Street, Kansas City, MO 64127
3014 East 19th Terrace, Kansas City, MO 64127
3015 East 19th Street, Kansas City, MO 64127
3017 East 19th Street, Kansas City, MO 64127
3019 East 19th Street, Kansas City, MO 64127
3021 East 19th Terrace, Kansas City, MO 64127
3023 East 19th Terrace, Kansas City, MO 64127
3025 East 19th Terrace, Kansas City, MO 64127
3027 East 19th Terrace, Kansas City, MO 64127
3101 East 19th Terrace, Kansas City, MO 64127
3107 East 19th Terrace, Kansas City, MO 64127
3007 East 20th Street, Kansas City, MO 64127
3009 East 20th Street, Kansas City, MO 64127
3011 East 20th Street, Kansas City, MO 64127
3013 East 20th Street, Kansas City, MO 64127
3015 East 20th Street, Kansas City, MO 64127
3017 East 20th Street, Kansas City, MO 64127
3030 East 20th Terrace, Kansas City, MO 64127
3030A East 20th Terrace, Kansas City, MO 64127
3032 East 20th Terrace, Kansas City, MO 64127
3206 East 20th Terrace, Kansas City, MO 64127
3208 East 20th Terrace, Kansas City, MO 64127
3214 East 20th Terrace, Kansas City, MO 64127
3216 East 20th Terrace, Kansas City, MO 64127
3218 East 20th Terrace, Kansas City, MO 64127

Site 2 - Benson Mfg. Site

3005 East 18th Street, Kansas City, MO 64127
1811 Agnes Avenue, Kansas City, MO 64127

See Project Map, Attached.

6. Contacts:

a. Project Director

Andrew Bracker
Brownfields Coordinator
Department of City Planning and Development
City of Kansas City, MO
414 E. 12th Street, 16th Floor
Kansas City, MO 64106
Phone: (816) 513-3002
Email: Andrew.bracker@kcmo.org

b. Chief Executive/Highest Ranking Elected Official:

Mayor Quinton D. Lucas
City of Kansas City, MO
414 E. 12th Street, 29th Floor
Kansas City, MO 64106
Phone: (816) 513-3500
Email: quinton.lucas@kcmo.org

7. Population:

City of Kansas City, MO: 484,387

8. Other Factors:

Sample Format for Providing Information on the Other Factors	Page #
Community population is 15,000 or less.	
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
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).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2014 or later) or is closing.	

9. Releasing Copies of Applications: Not Applicable

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area:

The Washington Wheatley Target Area is a residential neighborhood of 262 acres located 3 miles east of downtown Kansas City, Missouri. It is challenged by its many vacant brownfield properties which are the direct legacy of racial discrimination. In the 1920s, homes of black families were notoriously bombed when they moved into white blocks. In 1940, Washington Wheatley was home to 11,697¹ residents located in an area of only 2.6 square miles where blacks could live. In the following decades, the neighborhood was systematically depopulated. First, predatory “block-busting” tactics drove whites to sell out when blacks moved in. They left for neighborhoods where blacks were excluded, aided by federal mortgage lending policies, racially restrictive covenants and bank redlining practices. By 1974, most neighborhoods east of Troost Ave., like Washington Wheatley, were **90% or more black**.² In 1956, federal construction of Highway I-70 cut through the neighborhood, isolating residents and subjecting them to noise and pollution while hastening the exit of remaining whites. Meanwhile, blacks were denied access to basic wealth-building tools: higher education, professional jobs and desirable homes. As poverty increased, Washington Wheatley homes and businesses deteriorated. By 2022, **only 2,133³ residents remained**. When residents could finally choose where to live, the neighborhood emptied as it was increasingly exposed trash, traffic, industry, vice and crime.

Today, **46% of Washington Wheatley’s properties are vacant**. Hundreds of derelict houses and industrial buildings were torn down, leaving behind a toxic legacy. Lead contamination has been found on 37 of 44 vacant properties tested and hundreds of other vacant properties in the neighborhood may also be contaminated. Lead’s many destructive outcomes are starkly evident in the neighborhood: poverty, poor health, violence and shortened lives. Close to these vacant lots, former industrial brownfields pose additional health risks and significant contamination has been confirmed on one of many sites. Despite high demand for new affordable housing, developers are wary of buried foundations and hidden lead, asbestos and other contaminants. The grant will remove contamination in soil and buried rubble, and make clean land available for new, safe housing and other investments to help revitalize the neighborhood.

ii. Descriptions of the Proposed Brownfield Sites:

This grant addresses the Vacant Lots Site and the Benson Mfg. Site, located adjacent to each other on opposite sides of east 19th St. (see map). The Vacant Lots Site consists of 47 vacant residential parcels, 46 of which were previously developed. The average lot size is 3,320 square feet (sf) and the total area is approximately 3.66 acres. Many lots contain illegal dumping, dense overgrowth, and several lots have homeless camps. A Phase I environmental site assessment (ESA) in October 2024 identified recognized environmental conditions (RECs) including lead-based paint (LBP), polychlorinated biphenyls (PCBs) in caulk and asbestos-containing materials (ACM) in soils and buried debris; metals, petroleum and volatile organic compounds (VOCs) from the Benson Mfg. Site (discussed below); a printing business; a paint company; a former gas station; and, a drycleaner. A preliminary draft Phase II ESA in October 2024 found **lead contamination on 84% of the vacant lots** above the EPA residential screening level of 200 mg/kg and a maximum concentration of 1,450mg/kg. The percentage of lots contaminated is significantly more severe

¹ Historic 1940 census records compiled by tracts by UMKC Urban Design Studio, 2008.

² Segregation in KC: How the school district helped create the Troost Divide, Martin City Telegraph, 7/19/20.

³ 2018-2022 American Community Survey (ACS) 5-Year Estimates.

than in other neighborhoods. Historic records indicate that all the former houses likely had basements and, based on the City's experience, these basements are probably buried and filled with debris. The former houses were built before 1978, when ACM and LBP were commonly used and allowed by regulations. Permit records indicate that 35 of the demolitions occurred prior to 1998, when pre-demo asbestos inspections and abatement were not required, and therefore may contain buried ACM. All basements potentially contain PCB caulk, LBP and other hazardous wastes.

The Benson Mfg. Site consists of two properties that occupy a city block of 2.68 acres. The parcels are vacant and have no current land use. Past land use was dominated by Benson Manufacturing Co. which produced brass and aluminum products, including aircraft parts, barrels and light fixtures from at least 1936 to the 1970s. The Site also hosted a printer, a lumber yard, a coal company, and a paint company. Soil borings and inspections indicate extensive buried foundations and debris from 0' – 5'. A Phase I ESA identified RECs for past metals manufacturing and printing on site, and three historic garages nearby. A Phase II ESA found severe polycyclic aromatic hydrocarbon (PAH) contamination on approximately **75% of Site** at depths of 0' to 3', including concentrations of benzo(a)pyrene, a known carcinogen, **up to 254 times** the Missouri Risk-Based Target Level (RBTL) for residential use. PAHs were also detected in groundwater above residential RBTLs. One subsurface soil sample was found to contain another known carcinogen, trichloroethylene (TCE), at **nearly 9 times** the residential RBTL for vapor intrusion. Arsenic, barium, chromium (total), cadmium, and lead in groundwater exceed residential RBTLs. A soil gas investigation is recommended to determine if VOCs pose a risk to future occupants.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans:

The Vacant Lots Site will be developed into affordable, single- and multi-family homes through the Kansas City Housing Accelerator program. Approved builders will buy lots for \$1. New units must be compatible with the surrounding neighborhood and employ sustainable building practices. This strategy advances the Heart of the City Area Plan which recommends building neighborhoods in keeping with their historic character and increasing density to support economic development and transportation goals. It also follows guidance in the KC Spirit Playbook 2023 Comprehensive Plan to increase housing near employment centers and reuse brownfield properties.

For the Benson Mfg. Site, the City has an agreement to sell to a developer who has proposed building 32 single-family homes with a shared community building and green space. The neighborhood endorses a 2008 plan by developed University of Missouri-Kansas City (UMKC) students which proposes a business park. Both reuses, with some modifications, are permitted by the Heart of the City Area Plan. The City is committed to working with the neighborhood and the developer to produce a site reuse that is consistent with the Area Plan and supported by residents.

Led by a city councilmember, the neighborhood association president and vice president joined local redevelopment agencies, minority-owned businesses, and other partners (see table below, item 2.b.) to discuss vacant lots and develop the Housing Accelerator program in meetings held on 9/29/23, 12/5/23, 2/5/24 and 3/25/24. Meetings were then held with residents on 5/13/24 and 5/15/24 to introduce program and invite input. The City is currently working with residents on a community plan to identify barriers to new housing and assign action items to overcome them. Residents attended meetings on 9/12/24 and 10/10/24, and another meeting is scheduled 12/12/24.

ii. Outcomes and Benefits of Reuse Strategy:

The cleanup of the Vacant Lots Site will leverage an estimated **\$6.9 million** in new home construction. Developers are required to start building 1/3 of their units within 18 months. Pent up housing demand ensures new units will be sold and occupied quickly, which will help attract commercial/retail services back to the community. For the Benson Mfg. Site, the City issued a Request for Proposals in 2021 seeking light manufacturing, commercial, workforce housing and/or retail uses. Situated close to \$500 million of new and planned development in the 18th & Vine Jazz District, the Site has strong market potential and is the subject of frequent developer inquiries.

The Housing Accelerator program requires “environmentally friendly and sustainable principles in development design and construction wherever possible.” With the adoption of the 2021 International Energy Conservation Code (IECC) and the 2022 Kansas City Climate Protection and Resiliency Plan (CPRP), new development in Washington Wheatley will be: lower in carbon usage; more energy efficient; and more ready for solar, EV and electrical appliances compared to existing residential and commercial buildings. Developers will also be encouraged to use native plants and green infrastructure. Building in Washington Wheatley – close to regional jobs, health care, education and transit centers – will reduce vehicle miles traveled and related greenhouse gas emissions, thereby advancing CPRP climate mitigation goals.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Characterization:

Further assessment of both Sites is needed. A complete Phase II ESA of the Vacant Lots Site by the EPA Region 7 Targeted Brownfields Assessment (TBA) program is funded and expected by March 2025. A soil gas investigation for VOCs is recommended for the Benson Mfg. Site and will be funded by the City’s Brownfields Community-Wide Assessment Grant (4B-97794401). The grant has \$89,281 available for new tasks which is more than enough to complete the site assessment.

ii. Resources Needed for Site Remediation:

If remediation costs for both Sites exceed estimates, the City has identified as additional cleanup funds of \$1,405,207.02 in post-closure program income (PCPI) received on 10/15/24 in repayment of Brownfield revolving loan fund (RLF) loans issued through EPA cooperative agreement No. BF-97700901. See attachment to Narrative Information Sheet. The City is confident that these additional funds will be sufficient to complete remediation of both Sites.

iii. Resources Needed for Site Reuse:

The City has approved a proposed 2024 HUD Annual Action Plan that includes \$300,000 of Community Development Block Grant (CDBG) funds for blight removal in Washington Wheatley to directly support reuse of the Vacant Lots Site. On 10/15/24, the City submitted an application to HUD for a \$7 million PRO Housing grant to remove barriers to affordable housing in several neighborhoods, including Washington Wheatley. Grants from the City’s Central City Economic Development (CCED) sales tax program and Housing Trust Fund (HTF) will also be available to support affordable housing and economic development projects on both Sites.

iv. Use of Existing Infrastructure:

The project will reuse, repair and improve the existing City infrastructure grid serving both Sites. The combined sanitary/stormwater sewer system will be evaluated for service restoration, upgrades or replacement to handle increased demand and to comply with the City’s combined sewer overflow (CSO) plan and 2010 consent decree. Portions of relevant streets and alleyways are impassable and will be rebuilt and repaved. Many sidewalks, curbs and gutters have deteriorated

and will be repaired or replaced. Traffic lights, pedestrian crossings and signage will be brought up to code. This work will be funded with the help of a 1% local sales tax for public infrastructure that provides the City over \$30 million annually.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding:

Washington Wheatley has no significant resources for this cleanup project due to its small population and low income. The neighborhood association is a non-profit and lacks meaningful assets or revenue. The neighborhood cannot draw on other resources to fund cleanup or reuse of the Sites. The **poverty level is 21.8%**, more than double the 10.0% level of the Kansas City metropolitan statistical area (MSA).⁴ The population of 2,133 cannot afford the tax levies that would be needed to create a neighborhood improvement district (NID) to fund the project.

ii. Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations

Children under 5, a highly sensitive group for lead, are 8.1% of residents. Women aged 15-49 who could be pregnant, another high risk group for lead, are 20.6% of the population. The elderly (+65 years) who make up 13.4% of the population are more sensitive to contamination and at further risk as **life-expectancy is only 66 years** in this zip code (64127), nearly 30 years lower than the City's maximum. Houseless persons, identified in the Target Area, are vulnerable due to their chronic exposure to contaminants and environmental stressors. The grant will remove lead, PAHs, and asbestos in the environment which threaten the health of these sensitive populations. New housing will reduce the health risks of indoor lead dust and mold in older housing that impact this vulnerable group. The grant will develop an EJ plan to identify other risks to sensitive populations.

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

The zip code shared by Washington Wheatley (64127) has the City's **highest number of lead-poisoned children** under 6 years old and the 6th highest lead poisoning rate (12.1%), nearly 5 times the national rate (2.5%).⁵ In the census tract shared by Washington Wheatley, the asthma rate is 14.2%⁶, compared to 9.4% in Missouri.⁷ According to EJScreen, particulate matter, a cause of asthma, is above the 93rd percentile in Washington Wheatley. In the county shared by Washington Wheatley (Jackson), the rate of myeloma is 53% higher for men and 40% higher for women than for Missouri.⁸ The grant will directly reduce the risk of child lead poisoning by removing lead from soils. Asthma will be reduced by building new housing. Factors that contribute to a higher incidence of other diseases may be identified by the grant's Environmental Justice Plan.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

According to the Climate and Environmental Justice Screening Tool (CEJST), Washington Wheatley neighborhood is disadvantaged. Thresholds are met in **five environmental justice categories**. The following table shows the severity of these burdens.

⁴ 2018-2022 ACS, Population By Ratio of Income to Poverty Level.

⁵ KC Community Health Assess. <https://storymaps.arcgis.com/stories/83947dae543e4e478b49e582dfe96c81>.

⁶ Ibid.

⁷ Asthma in Missouri 2021 fact sheet, Missouri Department of Health and Senior Services (DHSS).

⁸ Missouri DHSS <https://healthapps.dhss.mo.gov/MoPhims/MOPHIMSHome>.

Burden	Percentile	Detail
Diesel particular matter exposure	92nd	Highway and railroad line proximity
Individuals < 200% federal poverty line	96th	
Energy burden	98th	High particulates + inefficient housing
Housing burden	96th	
Pre-1960s housing (lead paint indicator)	96th	Over 74% pre-1960s
Current asthma among adults	98th	
Diabetes among adults	98th	
Unemployment	96th	17% unemployment v. 3.6% nationally
Low median household income	96th	
Low life expectancy	99th	64.9 years, +30 years below city maximum

Lead contamination, found on 84% of vacant lots tested in Washington Wheatley, has likely contributed to the high rate of child lead poisoning in this neighborhood. Lead in children under 6, at even relatively low levels, lowers IQ, school performance, and lifetime earnings, and increases risks of cardiovascular and neurodegenerative diseases, and criminal arrests, as adults.^{9 10} Many of the burdens noted in Washington Wheatley are consistent with the known effects of lead poisoning.

(b) Advancing Environmental Justice

The cleanup and reuse of both Sites will advance environmental justice by removing dangerous lead, PAHs and other contaminants concentrated in Washington Wheatley by racial discrimination and poverty, thereby breaking the cycle of lives damaged and shortened by lead poisoning and giving new generations of children the chance to reach their full potential. It will address the burden of poor housing by providing new clean and safe units. The grant will help residents develop an Environmental Justice Plan that identifies health, well-being and environmental issues in their community, and assigns roles and responsibilities to address them. The grant will not displace current residents because it only addresses vacant properties.

b. Community Engagement

i. Project Involvement & ii. Project Roles

The following individuals and organizations will be involved in the proposed project.

Partner	Mission	Point of Contact	Project Roles
Washington Wheatley Neighborhood Assn.	Preserve neighborhood integrity by creating an equitable community	Marlon Hammons, Pres. wwnack@gmail.com	Input on cleanup and redevelopment plans
Community Builders of Kansas City	Nonprofit urban core developer, transforming communities.	Emmet Pierson, CEO epierson@cb-kc.org	Development and project consultant
Seton Center	Social services (dental, food, rent, etc.) for families and seniors	Chelsea Fernandez, chelsea.fernandez@setonkc.org	Meeting space; community support
Economic Development Corporation of KC (EDC)	Promoting development, job creation and community investment	Daniel Moye, dmoye@edckc.com	Property tax abatement; incentives
KD Academy	24/7 childcare & learning center for alternative-shift workers	Myron McCant, mmccant62@yahoo.com	Childcare/early learning services

The neighborhood association will be directly involved in shaping and approving Site reuse plans. Seton Center will host community meetings and work to meet the needs of current and future

⁹ Lead Poisoning, Lanphear et al., N Engl J Med 2024; 391:1621-1631.

¹⁰ Association Of Prenatal and Childhood Blood Lead Concentrations With Criminal Arrests In Early Adulthood, Wright et al. Public Library of Science (PLOS) Medicine (2008).

residents. Community Builders and EDC will assist Site developers with advice and incentives.

iii. Incorporating Community Input

The City's plan to communicate project progress to residents and community partners is to:

- 1) provide brief, non-technical summaries of the project and work completed on a quarterly basis;
- 2) make in-depth materials and resources available to those who want a better understanding of the issues and options;
- 3) provide bilingual materials to those who need them; and,
- 4) utilize the normal monthly neighborhood meeting times and place (Seton Center) familiar to residents and partners.

The City will provide a virtual hybrid meeting alternative for those who prefer not to attend in-person, and make recordings and meeting minutes available to those who cannot attend virtually.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

For the Vacant Lots Site, the cleanup will remove contaminated surface soil to a depth of 1 foot, and remove buried foundations and debris, including ACM and other hazardous wastes, to a further depth of up to 5 feet. Excavated materials will be sorted and managed as: (1) special waste containing lead, ACM, PAHs, etc. for disposal at a Subtitle D permitted landfill; (2) construction and demolition (C&D) waste for disposal at a C&D landfill; (3) concrete, limestone, etc. for on-site crushing and reuse to reduce landfill space consumption; (4) recoverable metals and architectural salvage for recycling; and (5) municipal solid waste. A toxicity characteristic leaching procedure (TCLP) test will be performed to verify that special wastes meet disposal facility specifications. Dust will be monitored and controlled with water spray. Air sampling will be performed for asbestos fibers. Soil track-out will be controlled by decontaminating equipment and cleaning streets each workday. Remediation activities will continue until contaminants of concern meet applicable cleanup levels and all buried debris is removed. Aggregate produced by on-site crushing will be used as backfill to the extent allowed by the oversight agency. Backfill will be tested to verify lead is below 100 mg/kg and compacted in lifts. The Site will be seeded and silt fencing installed to prevent erosion. The cleanup plan for the Benson Mfg. Site is the same as above, plus a final site grading will be performed in accordance with a City site disturbance permit. Characterization of both Sites will be completed by June 15, 2025 and may identify VOCs or other contamination that requires additional cleanup. The City has successfully implemented similar cleanup plans for the 63rd & Prospect Avenue Redevelopment Site and the Mattie Rhodes Art Center, both reported in the Assessment, Cleanup and Redevelopment Exchange System (ACRES).

b. Description of Tasks/Activities and Outputs

Task 1: Community Engagement
i. Project Implementation <ul style="list-style-type: none"> • EPA-funded activities for both Sites: <ol style="list-style-type: none"> 1. Host public meetings quarterly at Seton Center 2. Procure EJ community engagement services; develop Environmental Justice Plan 3. Progress reports, ACRES database, grant compliance, track outputs/outcomes. • Non-EPA grant resources needed to carry out task/activity: KCMO staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
ii. Anticipated Project Schedule (for EPA funded Activities Only): Begin quarterly public meetings 1 st quarter. By 3 rd quarter, hire community engagement facilitator. By end of Year 2, approve EJ plan. In Years 3 & 4, present results of both Site cleanups to community.
iii. Task/Activity Lead: City is lead on Task 1.
iv. Outputs: 16 public meetings; one EJ plan; 16 quarterly reports; 2 ACRES property profiles.

Task 2: Cleanup
<p>i. Project Implementation</p> <ul style="list-style-type: none"> • EPA-funded activities (Vacant Lots Site): <ol style="list-style-type: none"> 1. Mobilize equipment and secure areas for excavation, loading and stockpiling activities. 2. Excavate, transport and dispose of contaminated soils and C&D waste. 3. Sort, crush and reuse concrete, limestone, etc.to reduce carbon footprint and landfill use. 4. Control dust with water spray and prevent track-out. 5. Backfill with verified clean soils compacted in lifts. • EPA-funded activities (Benson Mfg. Site): Same as above, plus: <ol style="list-style-type: none"> 1. Grade site per approved site disturbance permit. <p>Non-EPA grant resources needed to carry out task/activity: KCMO staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).</p>
<p>ii. Anticipated Project Schedule (for EPA-funded Activities Only)</p> <p>(Vacant Lots site): Procure bids and sign cleanup contracts by 3rd quarter, Year 1. Conduct cleanup activities, 4th quarter, Year 1 to 2nd quarter Year 2.</p> <p>(Benson Mfg. Site): Same plus site grading by 4th quarter Year 2.</p>
<p>iii. Task/Activity Lead: City is lead on Task 2; Will coordinate site grading with developer.</p>
<p>iv. Outputs (Vacant Lots Site): 47 remediated and ready to reuse properties, 3.66 acres.</p> <p>Outputs (Benson Mfg. Site): 2 remediated and ready to reuse properties, 2.68 acres.</p>
Task 3: Cleanup Oversight
<p>i. Project Implementation</p> <ul style="list-style-type: none"> • EPA-funded activities (Vacant Lots Site): <ol style="list-style-type: none"> 1. Procure QEP, enroll Site in Missouri Brownfields Voluntary Cleanup Program (BVCP). 2. Finalize RAP, develop Quality Assurance Project Plan (QAPP), review work plans. 3. Air monitoring for asbestos, monitor excavation for ACM, TCLP tests for disposal. 4. Prepare closeout report and liaison with BVCP on No Further Action (NFA) letters. • EPA-funded activities (Benson Mfg. Site): Same as above, plus: <ol style="list-style-type: none"> 1. Monitor site grading for ACM and other hazardous wastes. 2. Coordinate with BVCP on groundwater activity and use limitations for site closure. • Non-EPA grant resources needed to carry out task/activity: KCMO staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
<p>ii. Anticipated Project Schedule (for EPA-funded Activities Only)</p> <p>(Vacant Lots Site): Procure QEP 90 days prior to grant award. Enroll Site into BVCP by 1st quarter. Bid specifications, final RAP and QAPP by 2nd quarter. Cleanup Oversight 4th quarter, Year 1 to 2nd quarter, Year 2. NFA letters by 1st quarter, Year 3.</p> <p>(Benson Mfg. Site): Same as above, except Cleanup Oversight 4th quarter, Year 1 to 4th quarter, Year 2. Site Closeout and NFA letter by 3rd quarter, Year 3.</p>
<p>iii. Task/Activity Lead: City is lead on Task 3.</p>
<p>iv. Outputs: Two approved RAPs; two NFA letters.</p>
Task 4: Administrative Costs
<p>i. Project Implementation</p> <ul style="list-style-type: none"> • EPA-funded activities for both Sites: <ol style="list-style-type: none"> 1. Track and ensure compliance with grant terms and conditions. 2. Maintain financial management systems for grant activities and drawdown grant funds. 3. Prepare revisions to budget, scopes of work, program plans, as needed. 4. Submit financial, MBE/WBE, and closeout reports, other than final performance report. • Non-EPA grant resources needed to carry out task/activity: City staff services necessary to perform this task may exceed charges to EPA grant (not counted as cost share).
<p>ii. Anticipated Project Schedule: Start activities 1st quarter and continue through end of term.</p>

iii. Task/Activity Lead: City is lead on Task 4.
iv. Outputs: 8 semi-annual MBE/WBE reports; 4 annual reports and 1 final financial report.

c. Cost Estimates

Grant Budget Table

Budget Categories		Project Tasks (\$)				Total
		Task 1: Community Engagement	Task 2: Cleanup	Task 3: Cleanup Oversight	Task 4: Admin Costs	
Direct Costs	Personnel	11,191	136,716	15,537	74,312	237,756
	Fringe Benefits	4,937	56,988	6,521	30,649	99,095
	Travel	7,124				7,124
	Equipment					
	Supplies	4,111				4,111
	Contractual Vacant Lots Site Benson Mfg Site	20,000		52,500 52,500		125,000
	Construction Vacant Lots Site Benson Mfg Site		1,955,486 1,529,428			3,484,914
	Other: VCP Fees, Ads, Training Fees	14,600		27,400		42,000
	Total Direct Costs	61,963	3,678,618	154,458	104,961	4,000,000
Indirect Costs		0	0	0	0	0
Total Budget		61,933	3,678,618	154,458	104,961	4,000,000

Task 1, Community Engagement (both Sites) - \$61,963

- Personnel: Coordinator (required reporting, community meetings, manage EJ plan) 240hrs x \$46.63/hour (hr) = \$11,191.
- Fringe Benefits: Coordinator, 240hrs x \$20.57/hr = \$4,937.
- Travel: 2 conferences x 2 persons x (\$670 air + \$700 hotel + \$411 per diem) = \$7,124.
- Supplies: 2 laptops @ \$1,100ea. + \$511 meeting supplies + signage \$1,400 = \$4,111.
- Contractual: Community EJ Plan: 200 hours x \$100/hr = \$20,000.
- Other: Ads, 4 meetings/yr x 4ys x \$425/ad x 2 local newspapers = \$13,600.
- Other: conference registration fees, 2 persons x 2 conferences x \$250ea = \$1,000.

Task 2, Cleanup - \$3,678,618 – (Note: crushing and reuse of aggregate is estimated to cost \$75,000 for both Sites, but is expected to save roughly an equal amount in transportation and disposal costs and is therefore not reflected in the following cost estimate detail.)

- Personnel: Coordinator (procurement, cleanup oversight, grant compliance) 1,200hrs x \$46.63/hr = \$55,956; Project Manager (procurement, contract administration, project management) 2,400hrs x \$33.65/hr = \$80,760. Total = 136,716.
- Fringe Benefits: Coordinator 1,200hrs x \$20.57/hr = \$24,684; Project Manager 2,400hrs x \$13.46/hr = \$32,304. Total = \$56,988.

Construction - Vacant Lots Site - \$2,052,338

- Part 1 - Surface soil remediation: 62 contaminated grids (over 37 lots) x 1,660 square feet

(sf) per grid x 1 foot (ft) depth = 102,920 cubic feet (cf) ÷ 27 cf/cubic yard (cy) = 3,811.85 cy x 1.4 tons/cy = 5,336.59 tons x \$108.81/ton = \$580,674.

- Part 2 - Basement removal (with ACM): 30 basements x 166.667 cy buried debris x 1.4 tons/cy = 7,000 tons x \$130.81/ton (ACM) = \$915,670.
- Part 3 - Basement removal (no ACM): 17 basements (estimated without ACM) x 166.667 cy buried foundations & debris per lot x 1.4 tons/cy = 3,966.67 tons x \$115.75/ton (C&D) = \$459,142. Total (1+2+3) = \$1,955,486.

Construction - Benson Mfg Site – \$1,626,280

- Soil and debris remediation - 9,438 cy of PAH contaminated soil (consultant estimate) x 1.4 tons/cy = 13,213.20 tons x \$115.75/ton C&D = \$1,529,428.

Task 3, Cleanup Oversight - \$154,458

- Personnel: Coordinator (QEP management, voluntary cleanup program) 160hrs x \$46.63/hr = \$7,461; Project Manager (QEP procurement /contract admin.) 240hrs x \$33.65/hr = \$8,076. Total = \$15,537.
- Fringe Benefits: Coordinator 160hrs x \$20.57/hr = \$3,291; Project Manager 240hrs x \$13.46/hr = \$3,230. Total = \$6,521.

Vacant Lots Site – \$68,385

- Contract – QEP: 350hrs x \$150/hr = \$52,500.
- Other – VCP: \$200 enrollment fee + \$6,000 oversight fees = \$6,200.

Benson Mfg Site - \$86,073

- Contract – QEP: 350hrs x \$150/hr = \$52,500.
- Other – VCP: \$200 enrollment fee + \$6,000 oversight fees + \$15,000 long-term stewardship fee = \$21,200.

Task 4, Administrative Costs (both sites) - \$104,961

- Personnel: Coordinator (grant compliance, budget revisions, financial reports, closeout) 480hrs x \$46.63/hr = \$22,382; Fiscal Officer (accounting, financial reports, payments, draw downs, grant closeout) 1,500 hrs x \$34.62/hr = \$51,930. Total = \$74,312.
- Fringe Benefits: Coordinator 480hrs x \$20.57/hr = \$9,874; Fiscal Officer 1,500 hrs x \$13.85/hr = \$20,775. Total = \$30,649.

Indirect Costs. Not Applicable.

d. Plan to Measure and Evaluate Environmental Progress and Results

Progress on outputs and outcomes will be tracked in quarterly reports and ACRES. Projects will be reviewed monthly by Office staff and the QEP to identify and resolve any issues impeding performance. Outputs will be evaluated annually against work plan goals for the 4-year period.

Output	Measure	Goal
Community Meetings	Numbers of meeting minutes prepared	16 minutes
Land Cleaned	Acres of cleanups completed	6.34 acres
Properties Ready for Reuse	Number of “No Further Action” Letters	48 letters
EJ Community Plan	Delivery of completed plan	1 plan
Outcome	Measure	Goal
Properties Sold to Developers	Number of properties sold	49 properties
Building Permits Issued	Number of permits issued	30 permits

Redevelopment Leveraged	Amount of Public/Private funds leveraged	\$12,000,000
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4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure & ii. Description of Key Staff:

Grant funds and activities will be managed by the City's Brownfields Office (Office). The Brownfields Manager, Andrew Bracker, will oversee the program and Office to ensure all grant funds are appropriately spent and all work plan objectives and grant terms and conditions are successfully met. Mr. Bracker has 27 years of experience in these roles and has successfully managed over \$27 million of EPA Brownfield funds. Scott Levin, Brownfields Development Specialist, has 28 years of professional environmental experience, and has worked nearly two years performing project management, contract administration, and ACRES database maintenance. The City is currently hiring a Brownfields Fiscal Officer to provide accounting services and ensure compliance with grant financial requirements. The Office will use the City's financial system to administer and track grant funds, manage purchase orders, payments and fund draws. The City will contract with a QEP for technical assistance to help design, procure, and oversee remediation work.

iii. Acquiring Additional Resources:

Remediation contractors will be procured by sealed bids using the City's procurement system to manage the bid process. The City's Department of Civil Rights and Equal Opportunity will assist in maximizing opportunities to hire locally and ensure compliance with wage and labor requirements. Good faith efforts to offer contract opportunities to disadvantaged businesses will be employed and documented. The City will procure QEP services through a competitive solicitation.

b. Past Performance and Accomplishments

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

Accomplishments under the City's current Brownfield grants include: 6 sites assessed, 1 site effectively cleaned up (waiting on NFA letter), 1 site redeveloped, \$44,000,000 of redevelopment leveraged, and 25 jobs created. Not all of these outputs are reflected in the (ACRES). The City plans to reflect all progress in ACRES by the end of 2024.

(2) Compliance with Grant Requirements

For open grants, substantial progress has been made and reported towards meeting all work plan goals in a timely manner, except for a Site-Specific Assessment Grant which was suspended 18 months while EPA and HUD resolved an eligibility issue. A full pipeline of assessment and RLF projects was added in 2023 through a Call for Projects and are currently in process. All quarterly reports have been submitted on time or within an allowed extension. Financial status and MBE/WBE reports have not always been submitted on time but have been submitted when requested. Corrective measures included hiring a Brownfields Development Specialist on 2/12/23 and recruiting a Fiscal Officer to increase institutional capacity. Open grants include: 1) Community-Wide Assessment (4B-97794401), 9/1/22 to 8/31/25; 2) Site-Specific Assessment (4B-97794301), 9/1/22 to 8/31/25; 3) Coalition RLF (BF-97782201), 9/1/20 to 8/31/25; 4) Supplemental RLF (4B-97798101), 9/1/22 to 8/31/29; and, 5) Supplemental Coalition RLF (4B-97798201) 9/1/22 to 8/31/29. Funds remain on all open grants, which the City plans to expend through the completion of existing pipeline projects. Total unspent funds on 17 closed grants = \$128,489 out of \$9,173,826 awarded. \$109,998 unspent ARRA RLF funds were due to a lack of eligible petroleum projects.

THRESHOLD CRITERIA RESPONSES

Item 1 – Applicant Eligibility

Item 2 – Previously Awarded Cleanup Grants

Item 3 – Expenditure of Existing Multipurpose Grant Funds

Item 4 – Site Ownership

Item 5 – Basic Site Information

Item 6 – Status of History of Contamination at the Sites

Item 7 – Brownfield Site Definition

Item 8 – Environmental Assessment Required for Cleanup Grant Applications

Item 9 – Site Characterization

Item 10 – Enforcement or Other Actions

Item 11 – Sites Requiring a Property-Specific Determination

Item 12 – Threshold Criteria Related to CERCLA/Petroleum Liability

Item 13 – Cleanup Authority and Oversight Structure

Item 14 – Community Notification

Item 15 – Contractors and Named Subrecipients

ITEM 1

Applicant Eligibility

The City of Kansas City, Missouri (“Kansas City” or “City”), as applicant, is a general purpose unit of local government and thus is an eligible entity for a Brownfields Cleanup grant.

ITEM 2

Previously Awarded Cleanup Grants

Kansas City affirms that the proposed sites have not received funding from a previously awarded Environmental Protection Agency (EPA) Brownfields Cleanup Grant.

ITEM 3

Expenditure of Existing Multipurpose Grant Funds

Kansas City affirms that it does not have an open EPA Brownfields Multipurpose Grant.

ITEM 4

Site Ownership

Kansas City is the current owner of the Washington Wheatley Vacant Lots Site (Vacant Lots Site) through:

- A) Land Bank of Kansas City, Missouri, an instrumentality of Kansas City funded, staffed and governed by Kansas City.
- B) Kansas City Missouri Homesteading Authority, an instrumentality of Kansas City funded, staffed and governed by Kansas City.

Kansas City is the current owner of the Former Benson Manufacturing Company Site (Benson Mfg. Site).

ITEM 5

Basic Site Information

(Two Sites)

Site 1

a) **Site Name:** Washington Wheatley Vacant Lots Site (Vacant Lots Site)

b) **Site Address(es):** 1822 Agnes Avenue, Kansas City, MO 64127
1824 Agnes Avenue, Kansas City, MO 64127
1826 Agnes Avenue, Kansas City, MO 64127
1832 Agnes Avenue, Kansas City, MO 64127
1834 Agnes Avenue, Kansas City, MO 64127
1844 Agnes Avenue, Kansas City, MO 64127
1846 Agnes Avenue, Kansas City, MO 64127
1903 Agnes Avenue, Kansas City, MO 64127
1905 Agnes Avenue, Kansas City, MO 64127
1907 Agnes Avenue, Kansas City, MO 64127
1909 Agnes Avenue, Kansas City, MO 64127
1911 Agnes Avenue, Kansas City, MO 64127
1913 Agnes Avenue, Kansas City, MO 64127
1915 Agnes Avenue, Kansas City, MO 64127
1917 Agnes Avenue, Kansas City, MO 64127
1919 Agnes Avenue, Kansas City, MO 64127
1912 Walrond Avenue, Kansas City, MO 64127
3005 East 19th Street, Kansas City, MO 64127
3007 East 19th Street, Kansas City, MO 64127
3009 East 19th Street, Kansas City, MO 64127
3009B East 19th Street, Kansas City, MO 64127
3011 East 19th Terrace, Kansas City, MO 64127
3013 East 19th Street, Kansas City, MO 64127
3014 East 19th Terrace, Kansas City, MO 64127
3015 East 19th Street, Kansas City, MO 64127
3017 East 19th Street, Kansas City, MO 64127
3019 East 19th Street, Kansas City, MO 64127
3021 East 19th Terrace, Kansas City, MO 64127
3023 East 19th Terrace, Kansas City, MO 64127
3025 East 19th Terrace, Kansas City, MO 64127
3027 East 19th Terrace, Kansas City, MO 64127
3101 East 19th Terrace, Kansas City, MO 64127
3107 East 19th Terrace, Kansas City, MO 64127
3007 East 20th Street, Kansas City, MO 64127

3009 East 20th Street, Kansas City, MO 64127
3011 East 20th Street, Kansas City, MO 64127
3013 East 20th Street, Kansas City, MO 64127
3015 East 20th Street, Kansas City, MO 64127
3017 East 20th Street, Kansas City, MO 64127
3030 East 20th Terrace, Kansas City, MO 64127
3030A East 20th Terrace, Kansas City, MO 64127
3032 East 20th Terrace, Kansas City, MO 64127
3206 East 20th Terrace, Kansas City, MO 64127
3208 East 20th Terrace, Kansas City, MO 64127
3214 East 20th Terrace, Kansas City, MO 64127
3216 East 20th Terrace, Kansas City, MO 64127
3218 East 20th Terrace, Kansas City, MO 64127

Site 2

- a) Site Name:** Former Benson Manufacturing Company Site (Benson Mfg. Site)
- b) Site Address(es):** 3005 E. 18th Street, Kansas City, Missouri 64127
1811 Agnes Avenue, Kansas City, MO 64127

ITEM 6

Status of History of Contamination at the Sites

Vacant Lots Site

a) Type of Contamination: Hazardous Substances

b) Operational History and Current Use:

The following information is based on a Phase I environmental site assessment (ESA) prepared by Toeroek dated 10/31/2024. The site properties have been used as residential since at least 1936. By 2009 the properties appear as vacant. At present, the site properties are vacant and have no current land use.

c) Environmental Concerns:

Recognized environmental concerns (RECs) on the Vacant Lots Site noted by the Toeroek Phase I ESA report include:

- Based on years during which former subject property structures were constructed (pre-1950s), lead-based paint (LBP) was likely used on building materials during initial construction. Soil on subject property parcels may contain lead in debris or runoff from painted surfaces. The likely presence of lead in soil derived from LBP is a REC.
- Based on years during which former subject property structures were constructed (pre-1950s), polychlorinated biphenyls (PCBs) may have been used in building materials during initial construction (in particular, in caulk). Soil on subject property parcels may contain PCBs in debris. The possible presence of PCBs in soil derived from building materials is a REC.
- The property north of and adjacent to (north of East 19th Street) was occupied by Benson Manufacturing Company (also known as the Granville Woods site), which manufactured aluminum aircraft parts and barrels from at least as early as 1951 until at least as late as 1963 according to Sanborn maps; and from at least as early as 1940 until 1970 according to city directories. The property was occupied by industrial buildings until at least as late as 1979 per aerial photography. A 2024 Limited Phase II ESA conducted at the Benson Manufacturing/Granville Woods site found SVOCs in surface soil at concentrations that exceeded non-residential RBTLS at the boundary between the Benson Manufacturing/Granville Woods site and the subject property. This contamination was likely from airborne deposition from industrial activities at the Benson Manufacturing/Granville Woods site and was likely also deposited on the subject property. Aluminum metal manufacturing operations on this property, with possible historical use of hazardous materials, pose a REC for the subject property.
- The Davis Standard Service site located at 2011 Agnes Avenue, southwest of and adjacent to the subject property, is listed in the EDR Historic Automotive database as operating from at least as early as 1986 until 1996. This facility is

upgradient of the subject property and poses a REC for certain subject property parcels.

- The nearby Liberty One Hour Dry Cleaners site located at 2017 Kansas Avenue, west and southwest of the subject property, is listed in the EDR Historic Cleaner database as operating from at least as early as 1992 to 1994. This facility is upgradient of the subject property and poses a REC for certain subject property parcels.
- The following properties north of the subject property parcels and identified in city directories not listed in the EDR Radius Map Report pose a REC for the subject property parcels:
 - 3013 East 18th Street – Ransom F E Coal & Grain Co. Garage (1930);
 - 3001 East 18th Street – Tiffany Coal & Ice Co. (1920); and
 - 1902 Agnes Avenue – Gress & Co. Sheet Metal (1925).

Vapor Encroachment Concerns (VECs) for the Subject Property:

The following sites with chemicals of concern pose a VEC for select subject property parcels:

- The Davis Standard Service site located at 2011 Agnes Avenue and the Liberty One Hour Dry Cleaners site located at 2017 Kansas Avenue.
- Although not listed on the initial vapor encroachment screening, the historical Benson Manufacturing facility north of East 19th Street also poses a VEC for the subject property based on contamination of soil with TCE, as observed during the 2024 Limited Phase II ESA of the Benson Manufacturing/Granville Woods site.

Business Environmental Risks (BERs) for the Subject Property:

- Based on years during which former subject property structures were constructed (pre-1950s), asbestos may have been used in building materials during initial construction. Soil on subject property parcels may contain asbestos-containing materials (ACM) in debris. The possible presence of ACM in soil derived from building materials is an environmental concern.

d) How the Site Became Contaminated and the Nature and Extent of Contamination:

One or two composite samples of surface soils were collected from the accessible areas of all site properties and analyzed for RCRA-8 metals. A total of 96 samples were collected.

- Lead was detected in all surface soil samples collected at concentrations ranging from 37.8 mg/kg to 1,450 mg/kg. 72 samples exceeded the EPA Regional Screening Level (RSL) of 200 mg/kg, and 55 samples exceeded the Missouri Risk-Based Corrective Action (MRBCA) Risk-Based Target Level (RBTL) of 260 mg/kg. Based on the data provided, 37 of 44 properties sampled (approximately 84%) contained lead concentrations exceeding the EPA RSL.
- Arsenic was detected in all surface soil samples collected at concentrations ranging from 5.7 mg/kg to 20.5 mg/kg. Arsenic was detected at concentrations

exceeding the Jackson County average background concentration (16.603 mg/kg) in 5 samples

- Cadmium was detected in all surface soil samples collected at concentrations ranging from 0.74 mg/kg to 74.0 mg/kg. Cadmium was detected at concentrations exceeding the MRBCA Lowest Default Target Level (LDTL) (9.31 mg/kg) in 5 samples.
- Mercury was detected in all surface soil samples collected at concentrations ranging from 0.062 mg/kg to 10.5 mg/kg. Mercury was detected at concentrations exceeding the MRBCA LDTL (2.19 mg/kg) in 5 samples.
- No other metals analyzed exceeded applicable screening levels.

The Phase II ESA Report does not discuss the source of the contamination. Based on the REC noted in the Phase I ESA Report, it is reasonable to conclude that at least some of the contamination is related to LBP from the former housing structures on the site properties. However, air emissions from leaded gasoline near Interstate I-70 and roadways and historic air emissions from regional lead smelters and industrial sources may also have contributed to lead soil concentrations.

Benson Mfg. Site

a) Type of Contamination: Hazardous Substances

b) Operational History and Current Use:

The following information is based on a Phase I environmental site assessment (ESA) prepared by Tetra Tech dated 1/3/2024. The site was primarily developed for commercial and industrial uses from at least 1909 until the 1970s when the majority of structures were demolished. In 1909 the site was used by a machine shop, carpet shop, two restaurants and a livery. From at least 1936, Benson Manufacturing Co. operated on the west portion of the site. The company manufactured and fabricated brass, aluminum and other metals and alloys for aircraft parts, light fixtures, ornamental work for buildings, appliances, and aluminum barrels for breweries. Benson Mfg. was also a contractor to the U.S. Department of Defense and produced parts for missiles, tanks and other systems. In 1951, a lumber company operated on the east side and a paint company operated on the west side of the Site. By 1963, Benson Manufacturing occupied the entire site with the exception of the southeast corner. City directories indicate other site uses included a coal and ice company (1920), a furniture company (1930), a printing company (1935, 1940), a limousine service (1970) and other commercial businesses. A prior Phase I ESA prepared by Anlab (2014) indicated a service garage was a user of the site in 1923. At present, the site is vacant and has no current land use.

c) Environmental Concerns:

Recognized Environmental Conditions (RECs) on the Benson Mfg. Site noted by the Tetra Tech Phase I ESA report include:

- Based on the review of Sanborn fire insurance maps and city directory data, the subject property was depicted with a metals manufacturing facility with a foundry

and other metalworking operations from 1951 until 1963. The presence of metalworking operations for ten or more years poses a REC to the subject property.

- The 3109-11 AA Auto Garage site at 3109 East 18th Street is adjacent to the east-northeast of the subject property. This site is listed in the EDR Historic Automotive database in 1951. Based on the close proximity to the subject property and operation prior to the implementation of environmental regulations, this site poses a REC for the subject property.
- The David A Wilson Repair Shop site at 2927 East 18th Street is approximately 126 feet west-northwest of the subject property. This site is listed in the EDR Historic Automotive database in 1925. Based on the close proximity to the subject property and operation prior to the implementation of environmental regulations, this site poses a REC for the subject property.
- Evidence of an underground storage tank (UST) described in the Phase I ESA by Anlab May, 2014, existed at 3001 East 18th Street that once contained petroleum was found in a building permit from 1923. Missouri Department of Natural Resources (MDNR) has no records regarding this facility or the UST, meaning it is likely that the UST has not been removed and is still present on the subject property. The possible existence of the UST poses a REC to the subject property.
- Miller HP Printing Company, was listed in the city directory in 1938 at 3017 East 18th Street. This address is currently known as 3005 East 18th Street. Printing companies during this time period used a wide range of hazardous materials such as solvents and volatile organic compounds (VOCs). Based on its operation prior to the implementation of environmental regulations, this site poses a REC for the subject property.

d) How the Site Became Contaminated and the Nature and Extent of Contamination:

Tetra Tech collected surface soil, subsurface soil, and groundwater samples at the site to evaluate the RECs identified during the 2024 Phase I ESA (Tetra Tech 2024a). Analytical results were compared to the applicable screening levels. No surface or subsurface soil and groundwater samples exceeded established MRBCA regulatory levels except for:

- Surface Soil samples were found to have exceedances of polycyclic aromatic hydrocarbons (PAHs) including benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h) anthracene, and indeno(1,2,3-cd)pyrene above established Missouri Risk-Based Corrective Action (MRBCA) Risk-Based Target Levels (RBTLs) for residential, non-residential and construction worker scenarios. Report figures indicate that approximately 75% of the site area is impacted by PAHs at concentrations exceeding residential or higher RBTLs at depths ranging from 0' to 3'.
- No PAHs were detected in subsurface soils.
- Total Petroleum Hydrocarbons (TPH) for Gasoline Range Organics (GRO), Diesel Range Organics (DRO) and Oil Range Organics (ORO) were detected in subsurface soil samples but did not exceed any Lowest Default Target Levels

(LDTLs).

- Surface soils were found to have exceedance of lead and arsenic above established MRBCA RBTLs regulatory levels for residential soils across the Site. However, only three arsenic and lead concentrations exceeded their respective USGS background concentrations for Jackson County, MO.
- In subsurface soils, four lead concentrations exceeded the RBTL and USGS background concentration for Jackson County, MO.
- Subsurface soils were found to have exceedances of VOCs including tetrachloroethylene (PCE) and trichloroethylene (TCE) concentrations exceeded LDTLs and detected concentration of TCE which exceeded its RBTL for residential soils in one boring location.
- Subsurface soils were found to have concentrations of lead, which exceeded the RBTL and USGS background concentration for Jackson County, were detected at several locations across the site.
- Groundwater samples were found to have exceedances of concentration of metals which exceeded RBTLs for the domestic use pathway including arsenic, barium, chromium (total), cadmium, and lead.

The Phase II ESA Report concludes with a recommendation that a soil management plan be developed and a soil gas investigation be performed to determine if VOCs pose a vapor inhalation risk to future site occupants, which may include residential users.

The Phase II ESA Report does not provide information on how the site became contaminated or the source of the contamination. However, based on the history of site uses, it is reasonable to assume that the site contamination is related to former commercial and industrial operations on the site.

ITEM 7

Brownfield Site Definition

Kansas City affirms that the Vacant Lots Site and the Benson Mfg. Site are both:

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

ITEM 8

Environmental Assessment Required for Cleanup Grant Applications

Vacant Lots Site

1. Phase I Environmental Site Assessment (ESA), KCMO Site – Washington Wheatley Neighborhood, Kansas City, Jackson County, Missouri, Targeted Brownfields Assessment (TBA), Toeroek, October 31, 2024.

A Phase I ESA was performed in accordance with ASTM International (ASTM) Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E1527-21) (ASTM 2021), and otherwise in compliance with EPA’s “All Appropriate Inquiries” Rule (40 Code of Federal Regulations [CFR] Part 312).

2. Preliminary Draft Phase II ESA, KCMO Site – Washington Wheatley Neighborhood, Kansas City, Jackson County, Missouri, Targeted Brownfields Assessment (TBA), Toeroek, October 31, 2024.

The Preliminary Phase II ESA was limited to collection of two composite surface soil samples from each of the 47 parcels and analysis of the samples for RCRA-8 metals. Future Phase II work will include additional surface soil, subsurface soil, and groundwater sampling, as needed, to confirm or eliminate recognized environmental conditions (RECs) identified during the Phase I ESA (Toeroek 2024). The Preliminary Phase II ESA Report is consistent with ASTM International (ASTM) Standard E1903-19 for Phase II ESAs (ASTM 2019), and otherwise complies with EPA’s “All Appropriate Inquiries” Rule (Title 40 Code of Federal Regulations [40 CFR] Part 312).

Benson Mfg. Site

1. Phase I ESA, 1810 Agnes Ave, 1811 Agnes Ave., & 3005 E 18th St., Kansas City, Missouri, Anlab Environmental, May 22, 2014.

A Phase I ESA was performed in accordance with ASTM E 1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process which conforms to the standards for All Appropriate Inquiry Rule (40 Part 312).

2. Phase I ESA, 3005 East 18th Street and 1811 Agnes Avenue, Kansas City, Missouri, New Horizons, July 5, 2022.

A Phase I ESA was performed in accordance with ASTM E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and otherwise complies with EPA’s “All Appropriate Inquiries” Rule (40 Part 312).

3. Limited Phase II ESA, 3005 East 18th Street and 1811 Agnes Avenue, Kansas City, Missouri, New Horizons, August 31, 2022.

The limited Phase II ESA was performed in accordance with ASTM Standard E1903-19 for Phase II ESAs. The Limited Phase II ESA was recommended based on information provided and a REC identified in the Phase I ESA completed by New Horizons dated July 5, 2022. The scope of work included nine soil borings and three soil vapor samples on the subject property. The soil boring and soil vapor locations were selected based on information provided in the Phase I ESA regarding historical manufacturing, metal working operations, and reported historical filling station underground storage tank (UST) on the subject property. Surface and subsurface soil samples were analyzed for RCRA 8 metals. Soil vapor samples were analyzed for volatile organic compounds (VOCs).

4. Phase I ESA, Granville Woods Community, 3005 East 18th Street and 1811 Agnes Avenue, Kansas City, Missouri, Tetra Tech, January 3, 2024.

A Phase I ESA was performed in accordance with ASTM E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and otherwise complies with EPA's "All Appropriate Inquiries" Rule (40 Part 312).

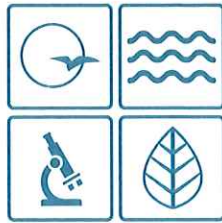
5. Phase II ESA, Granville Woods Community, 3005 East 18th Street and 1811 Agnes Avenue, Kansas City, Missouri, Tetra Tech, September 25, 2024.

A Phase II ESA was performed in accordance with ASTM E 1527-21 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process and otherwise complies with EPA's "All Appropriate Inquiries" Rule (40 Part 312). The scope of work included sampling surface and subsurface soils and groundwater throughout the Site to confirm or eliminate RECs identified during the 2024 Phase I ESA.

ITEM 9

Site Characterization

Attached is a current letter from the Missouri Department of Natural Resources regarding both sites proposed by Kansas City.



MISSOURI
DEPARTMENT OF
NATURAL RESOURCES

Michael L. Parson
Governor

Dru Buntin
Director

October 15th 2024

Andrew Bracker
Long Range Planning and Preservation Division; City of Kansas City
City Hall 16th Floor Suite 1605
414 East 12th Street
Kansas City, MO 65106

Dear Mr. Bracker:

The Missouri Department of Natural Resources Brownfields/Voluntary Cleanup Program (BVCP) acknowledges that the City of Kansas City plans to conduct the cleanup of brownfield sites and is applying for an FY25 EPA Brownfields Cleanup Grant.

The City of Kansas City has developed an application requesting site-specific federal Brownfields Cleanup funding for the Washington-Wheatley Vacant Lots Site which includes 47 vacant properties that need to be remediated for lead contamination as well as the Benson Manufacturing Site located at 3005 E. 18th St. and 1811 Agnes Ave. in Kansas City.

The BVCP affirms that the above-mentioned sites:

- i. Are eligible to be enrolled in the State voluntary response program;
- ii. Are not currently enrolled, but the City of Kansas City intends to enroll the sites in the voluntary response program;
- iii. The Benson Manufacturing Site has had a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on this site. Additional assessment is needed to sufficiently characterize the site for the remediation work to begin on the Washington-Wheatley Vacant Lots Site. There will be a sufficient level of site characterization from the environmental site assessments performed by June 15, 2025, for the remediation work to begin.

For any questions regarding this letter, please contact Sarah Darknell at 573-526-4725.

Sincerely,

Scott Huckstep, Chief
Brownfields/Voluntary Cleanup Program

SH:SDc



ITEM 10

Enforcement or Other Actions

Kansas City affirms that there are no known ongoing or anticipated environmental enforcement or other actions related to either of the two sites for which Brownfields Grant funding is sought.

ITEM 11

Sites Requiring a Property-Specific Determination

Kansas City affirms that no property specific determination is required for either of the two sites for which Brownfields Grant funding is sought.

ITEM 12

Threshold Criteria Related to CERCLA/Petroleum Liability

Vacant Lots Site

a. Property Ownership Eligibility – Hazardous Substance Sites

i. Exemptions to CERCLA Liability

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

(a) Circumstances Under Which the Property Was Acquired

All properties were acquired by either tax delinquency or by intergovernmental transfers through uniquely governmental functions. See below and attached table.

(b) Date on Which the Property Was Acquired

See below and attached table.

(c) Disposal of Hazardous Substances at the Site Occurred Before Acquisition

Kansas City affirms as to all 47 properties of the Vacant Lots Site that the disposal of hazardous substances occurred prior to the city's acquisition of the properties.

(d) Cause or Contribute to the Release of Hazardous Substances

Kansas City affirms as to all 47 properties of the Vacant Lots Site that the city did not cause or contribute to the release of hazardous substances on the properties. For some of the properties, the city cited a former structure on the property as a "dangerous building" and removed the building in accordance with city code provisions. Such removal of dangerous buildings by the city was an obligatory exercise of its police powers to protect public health and safety, and therefore are not actions that caused or contributed to the release of hazardous substances.

(e) Arranged for the Disposal of Hazardous Substances or Transported Hazardous Substances to the Site

The City affirms as to all 47 properties of the Vacant Lots Site that the City did not arrange for the disposal of hazardous substances on the properties or transport hazardous substances to the properties.

Facts Concerning Ownership

Each of the 47 properties that comprise the Vacant Lots Site are owned in the name of one of the following two entities:

- (1) Land Bank of Kansas City, Missouri (Land Bank)
- (2) Kansas City Missouri Homesteading Authority (Homesteading Authority)

As discussed below, both entities are instrumentalities of the applicant City of Kansas City, Missouri.

Land Bank

In 2012 the Missouri Legislature passed House Bill Nos. 1659 and 1116 in 2012, which legislation authorized the City of Kansas City to pass an ordinance to create the Land Bank with respect to properties within the Jackson County portion of Kansas City. The City Council through Committee Substitute for Ordinance No. 120779, passed on September 20, 2012, created the Land Bank.

Land Bank accepts properties that are offered through the tax sale in Jackson County, and are not purchased by third parties at the yearly delinquent tax sale. Under Municipal Code Section 74-73, the Land Bank is governed by a Board of Commissioners consisting of five members. All must be residents of Kansas City. One is appointed by Jackson County, one is appointed by Kansas City Public Schools, and three are appointed by the Mayor. The Land Bank office is located in City Hall and its staff are employees of Kansas City. A majority of the Land Bank operating budget is provided by the City.

Homesteading Authority

The Homesteading Authority is a Missouri non-profit corporation. According to its Articles of Incorporation, as amended, in 2011, the Board of Directors includes seven members, five of whom are city employees appointed by the City Manager and two are current city councilmembers appointed by the Mayor. The Bylaws of the Homesteading Authority, as amended in 2014, provide in Article III that *“the corporation shall pursue activities that are consistent with it being affiliated with the City of Kansas City, Missouri, to enable the corporation to be an “affiliate of a governmental unit” under the IRS regulations, including being supervised by the City and being financially accountable to the City.”* The Homesteading Authority is also officed and staffed by city employees in City Hall and the city funds its operating budget.

Table of Vacant Lots Site Properties

The following table provides information concerning the date, method and circumstances of acquisition for each of the 47 properties in the Vacant Lots Site.

Vacant Lots Site Properties List

Addresss	Owner	Type of Acquisition	Date Acquired
1846 Agnes Ave	Land Bank of Kansas City Missouri	Interagency Transfer - Kansas City Missouri Homesteading Authority to Land Bank of Kansas City, Missouri	5/23/2024
1832 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1824 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1822 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1844 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1826 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1903 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1905 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1907 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1911 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1913 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
3014 E 19th Ter	Land Bank of Kansas City Missouri		5/23/2024
3027 E 19th Ter	Land Bank of Kansas City Missouri		5/23/2024
3025 E 19th Ter	Land Bank of Kansas City Missouri		5/23/2024
3023 E 19th Ter	Land Bank of Kansas City Missouri		5/23/2024
3021 E 19th Ter	Land Bank of Kansas City Missouri		5/23/2024
1915 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1917 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
3007 E 20th St	Land Bank of Kansas City Missouri		5/23/2024
3032 E 20th Ter	Land Bank of Kansas City Missouri		5/23/2024
3030 E 20th Ter	Land Bank of Kansas City Missouri		5/23/2024
3030 A E 20th Ter	Land Bank of Kansas City Missouri		5/23/2024
3009 E 20th St	Land Bank of Kansas City Missouri		5/23/2024
3011 E 20th St	Land Bank of Kansas City Missouri		5/23/2024
3013 E 20th St	Land Bank of Kansas City Missouri		5/23/2024
3017 E 20th St	Land Bank of Kansas City Missouri		5/23/2024
3206 E 20th Ter	Land Bank of Kansas City Missouri		5/23/2024
3007 E 19th St	Land Bank of Kansas City Missouri		5/23/2024
3218 E 20th Ter	Land Bank of Kansas City Missouri		5/23/2024
3216 E 20th Ter	Land Bank of Kansas City Missouri		5/23/2024
3214 E 20th Ter	Land Bank of Kansas City Missouri		5/23/2024
3208 E 20th Ter	Land Bank of Kansas City Missouri		5/23/2024
3013 E 19th St	Land Bank of Kansas City Missouri		5/23/2024
1909 Agnes Ave	Land Bank of Kansas City Missouri		5/23/2024
1834 Agnes Ave	Kansas City Missouri Homesteading Authority	Interagency Transfer - Land Bank of Kansas City, Missouri to Kansas City Missouri Homesteading Authority	8/19/2021
3015 E 20th St	Kansas City Missouri Homesteading Authority		10/14/2020
3011 E 19th Ter	Land Bank of Kansas City Missouri	Tax Foreclosure - Court Administrator for the Circuit Court of Jackson County, Missouri to Land Bank of Kansas City, Missouri	3/2/2015
3019 E 19th St	Land Bank of Kansas City Missouri		3/2/2015
3015 E 19th St	Land Bank of Kansas City Missouri		3/2/2015
3017 E 19th St	Land Bank of Kansas City Missouri		3/2/2015
3009 B E 19th St	Land Bank of Kansas City Missouri		3/2/2015

Addresss	Owner	Type of Acquisition	Date Acquired
1912 Walrond Ave	Land Bank of Kansas City Missouri	Interagency Transfer - Jackson County Land Trust to Land Bank of Kansas City, Missouri	4/11/2013
1919 Agnes Ave	Land Bank of Kansas City Missouri		4/11/2013
3005 E 19th St	Land Bank of Kansas City Missouri		4/11/2013
3009 E 19th St	Land Bank of Kansas City Missouri		4/11/2013
3101 E 19th Ter	Land Bank of Kansas City Missouri		4/11/2013
3107 E 19th Ter	Land Bank of Kansas City Missouri		4/11/2013

Benson Mfg. Site

a. Property Ownership Eligibility – Hazardous Substance Sites

ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

(a) Circumstances Under Which the Property Was Acquired

Both properties were acquired by Quit Claim Deed. See below and attached table.

(b) Date on Which the Property Was Acquired

See below and attached table.

(c) Disposal of Hazardous Substances at the Site Occurred Before Acquisition

Kansas City affirms as to both properties of the Benson Mfg. Site that the disposal of hazardous substances occurred prior to the city's acquisition of the properties.

(d) Cause or Contribute to the Release of Hazardous Substances

Kansas City affirms as to both properties of the Benson Mfg. Site that the city did not cause or contribute to the release of hazardous substances on the properties. The city removed structures on the properties after acquisition and thereafter did not develop or improve the properties.

(e) Arranged for the Disposal of Hazardous Substances or Transported Hazardous Substances to the Site

The City affirms as to both properties of the Benson Mfg. Site that the City did not arrange for the disposal of hazardous substances on the properties or transport hazardous substances to the properties.

Table of Benson Mfg. Site Properties

The following table provides information concerning the date, method and circumstances of acquisition for the 2 properties in the Benson Mfg. Site.

Benson Mfg. Site Properties List

Addresss	Owner	Type of Acquisition	Date Acquired
3005 E 18th St	City of Kansas City, Missouri	Quit Claim Deed - Economic Development Corporation to City of Kansas City, Missouri	12/24/1979
1811 Agnes Ave	City of Kansas City, Missouri		

ITEM 13

Cleanup Authority and Oversight Structure

a. Cleanup Oversight

Kansas City plans to enroll both the Vacant Lots Site and the Benson Mfg. Site into the Missouri Brownfields Voluntary Cleanup Program. Through this program, the Missouri Department of Natural Resources will ensure adequate oversight of the cleanup of the both sites.

b. Plan to Access Adjacent Properties, If Needed

Should access to adjacent or neighboring properties be necessary to conduct the cleanup, perform confirmation sampling, or to monitor offsite migration of contamination, Kansas City will make reasonable attempts to contact the owner or occupants of such properties by registered mail to the address on file for the owner of the property as recorded in the County Recorder of Jackson County or by other appropriate means. Should the owner fail to respond, the city will provide documentation of its attempts to contact the owner and request that the State of Missouri, Department of Natural Resources (MDNR) contact the owner to request site access. Should the owner fail to respond to MDNR, the city will consider whether it has the authority to obtain access to the adjacent property under state law and/or municipal code provisions, and whether the exercise of such authority is appropriate under the circumstances.

ITEM 14

Community Notification Documents

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

The Draft ABCA addressed both the Vacant Lots Site and the Benson Mfg. Site. See Draft ABCA document attached, below.

b. Community Notification Ad

Notice of the public meeting was advertised in two local newspapers with circulation in the Target Area, including a bilingual publication in Spanish and English, on October 31, 2024, 14 days prior to submission of the grant application. Notice of the meeting was also posted on the City's brownfields webpage (www.kcmo.org/brownfields) and distributed by email to public and private stakeholders on the email lists of the Kansas City Brownfields Initiative (KCBI), the public forum for Brownfields grants and activities in the Kansas City metropolitan region. The ads clearly state that a copy of the grant application, including the draft ABCA, was available for public review and comment; how to provide comments by contacting andrew.bracker@kcmo.org; where the draft application could be accessed on-line through a meeting notice and link posted on the City's brownfields webpage; and the date, time, and location of the public meeting(s). See Advertisement Tear Sheets attached below.

c. Public Meeting

A public meeting concerning the proposed EPA Brownfields Cleanup Grant application was held virtually by Zoom Meeting on November 4, 2024 from 1:30 pm to 3:00 pm Central Time. A draft of the application, including the draft ABCA was provided by an on-line link to recipients of the email message, by link in the public notice posted on the city's brownfields webpage, and the same link was provided to attendees of the public virtual meeting.

1. Summary of Public Comments Received &
2. Responses to Public Comments

The only public comments received concerning the draft grant application were in the form of questions asked during the virtual public meeting. The questions and responses are summarized in the meeting notes, attached below.

3. Meeting Notes

Meeting notes are attached.

4. Meeting Sign-In Sheet

The sign-in sheet is included in the last page of the meeting notes. A list of attendees is also provided in the meeting notes.