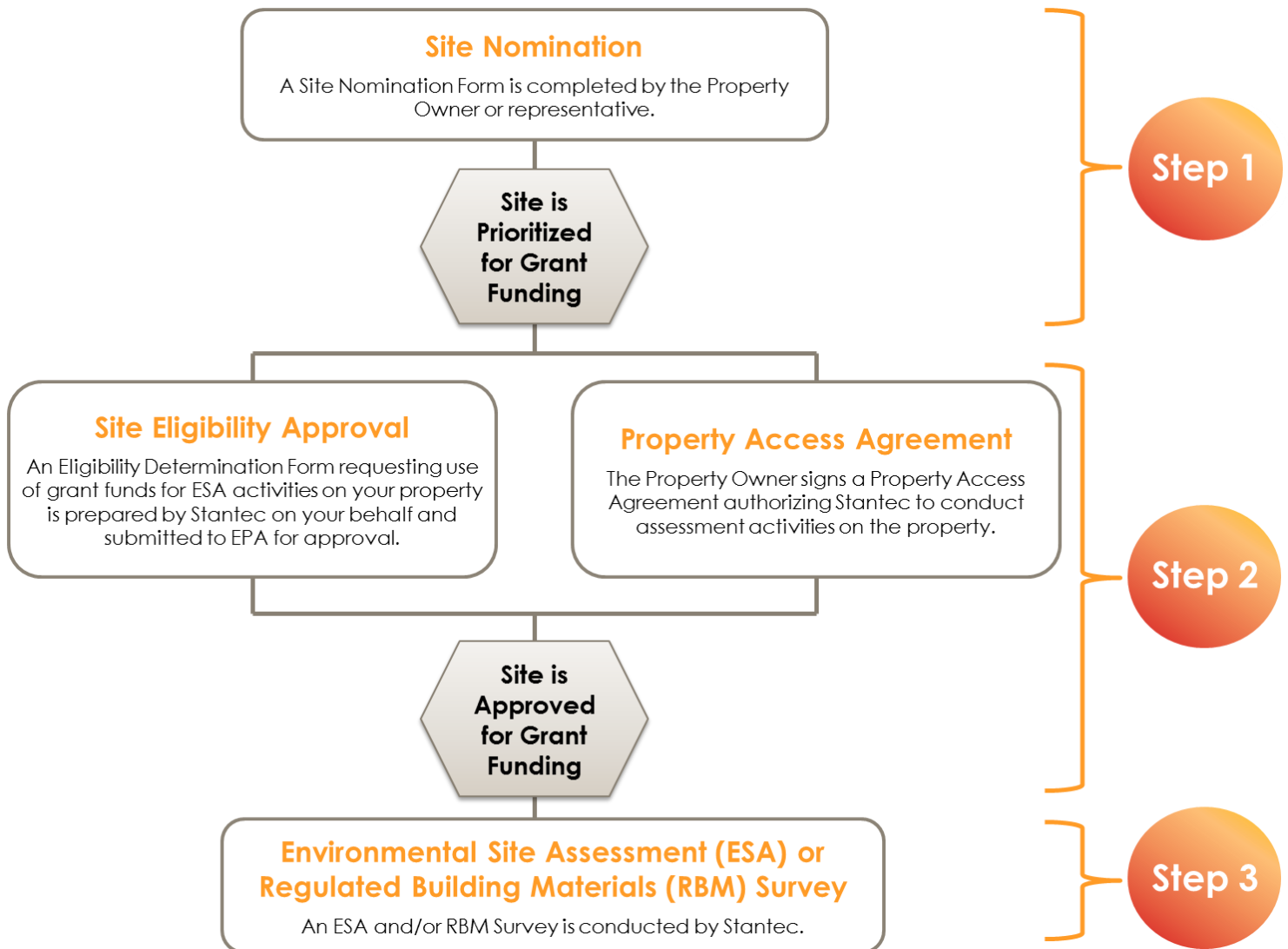


Process Guide for Property Owners & Stakeholders

This Process Guide was developed to provide an overview of the key steps and activities involved in the Community-Wide Brownfields Assessment Grant Implementation Program.

The program is funded by two U.S. Environmental Protection Agency (EPA) Brownfields Assessment Grants awarded in 2018 to a coalition led by Prairie Hills Resource Conservation and Development, Inc. (PHRCD) that includes Fulton, Knox, McDonough, and Warren Counties, and the Cities of Macomb and Monmouth. The program is managed by PHRCD with support from an environmental consulting team led by Stantec Consulting Services Inc. (Stantec).

The figure below outlines the key steps involved in the Environmental Site Assessment (ESA) process. Detailed descriptions of each step are provided on the following pages.



KEY STEPS

Below are descriptions of the steps required to obtain grant funding for ESA activities.

1 Site Nomination

A Site Nomination Form prepared by the property owner/representative is submitted to PHRCd for review to confirm the property meets baseline eligibility criteria. Generally, to be considered eligible for grant funding, the following criteria must be met:

- 1) the property is vacant or underutilized,
- 2) the property has potential impacts from petroleum or hazardous substances,
- 3) the property exhibits high potential for redevelopment and/or other opportunities to benefit the community, and
- 4) the property is not included on the EPA National Priority "Superfund" List, under a Consent Decree, or targeted for any federal or state enforcement action.

Properties that are nominated and meet the baseline eligibility criteria will be prioritized based on several factors, including greatest need and potential for economic development. Site Nomination Forms can be obtained from <http://www.prairiehillsrcd.org/resources--forms.html> or by emailing David King at david.king@prairiehillsrcd.org

2 Site Eligibility Approval & Access Agreement

Site Eligibility Determination Request

The information provided on your Site Nomination Form will be used to prepare a Site Eligibility Determination Request ("ED Request"). The ED Request will be prepared by Stantec and submitted on your behalf to the EPA and the Illinois Environmental Protection Agency to obtain approval for using grants funds for Environmental Site Assessment (ESA) activities on your property.

Estimated Timeline: 2-4 weeks

Note: Please let us know if your request for an ESA is related to due diligence for a property transaction already underway as there may be options to submit an expedited ED Request.

Property Access Agreement

Prior to initiating ESA activities, we must receive approval from you (in the form of a Property Access Agreement that will be provided for your review and signature), authorizing our environmental consultant (Stantec) to perform ESA activities on your property. The Property Access Agreement can be completed while waiting for site eligibility approval.

Estimated Timeline: 1-2 weeks



3 Environmental Site Assessment (ESA) or Regulated Building Materials (RBM) Survey

PHASE I ESA

A Phase I ESA is a research study intended to assess the environmental condition of a property and identify potential areas where substances may have been released. A Phase I ESA determines if any recognized environmental conditions ("RECs") exist on the property; however, it does not involve collecting environmental samples to confirm if there are actual impacts to the property.

Purpose of a Phase I ESA:

- Assess potential impacts from petroleum or hazardous substances.
- Establish baseline for liability protection.
- Support property sale/acquisition activities.
- Provide documentation typically required by lenders for securing loans.

Estimated Value: \$5,000+ | Estimated Timeline: 1-2 months

The Phase I ESA is comprised of three parts:

Part 1 – Site Visit and Interview (or Survey): After you sign the Access Agreement, Stantec will schedule a site visit and interview(s) with the property owner, current occupant(s), and/or other authorized representatives who are knowledgeable about the site. Site visits take an average of 2 hours and interviews are generally limited to 30 minutes. In situations where an in-person interview is not feasible, Stantec will conduct phone interviews and/or provide a survey form.

Part 2 – Desktop Study: Stantec will complete a comprehensive property background check that includes reviewing historical documents and regulatory databases to determine if any potential environmental concerns/RECs exist that may impact property reuse.

Part 3 – Final Report: A Phase I ESA Report will be prepared to summarize the findings of the site visit, interviews, and desktop study. A digital copy of the report will be provided for your review an prior to finalizing the document.

NEXT STEPS:

If **no RECs are identified**, additional action is not necessary.

If **RECs are identified**, Stantec will discuss the findings and provide recommendations for performing a Phase II ESA that will confirm if any environmental impacts exist on the property. If a Phase II ESA is recommended and you provide approval to proceed, Stantec will discuss the pros and cons associated with potential outcomes.

PHASE II ESA

A Phase II ESA involves a physical study where environmental samples are collected and analyzed to characterize the type, distribution and extent of substances in the environment (if present).

Purpose of a Phase II ESA:

- Evaluate the findings of the Phase I ESA (if RECs are identified).
- Determine if a release has occurred.
- Delineate the extent of contamination (if any).
- Support efforts to obtain regulatory closure from the state environmental agency.

Estimated Value: \$15,000-30,000+ | Estimated Timeline: 2-3 months

The Phase II ESA is comprised of three parts:

Part 1 – Work Plan: If you would like to move forward with a Phase II ESA, Stantec will prepare a Sampling and Analysis Plan (SAP) for your review and approval prior to submitting the document to EPA.

Part 2 – Fieldwork: After the SAP is approved by EPA, environmental samples (i.e. soil, groundwater, sediment, soil vapor) will be collected and analyzed. The study will characterize the type, distribution, and extent of potentially hazardous substances (if any) in the environment.

Part 3 – Final Report: A Phase II ESA Report will be prepared to summarize the work performed, analytical results, and conclusions. A digital copy of the report will be provided for your review prior to finalizing the document. Information collected during a Phase II ESA is typically not reported to regulatory agencies unless environmental impacts above acceptable regulatory levels are identified (in which case, the owner may be required to report the results).

NEXT STEPS:

If **contamination is below applicable regulatory limits**, additional action is not necessary.

If **contamination exceeds applicable regulatory limits**, Stantec will discuss the findings and available options. A summary of cleanup options, costs and risks can be included in the Phase II ESA Report or under a separate cover, depending on your preference.

REGULATED BUILDING MATERIALS (RBM) SURVEY

A RBM survey involves a physical study where samples of potentially hazardous building materials are collected and tested to confirm if regulated substances are present.

Purpose of a RBM survey:

- Determine if asbestos, lead-based paint, or other regulated hazardous substances are present in building materials.
- Evaluate regulations that apply to the disturbance or disposal of confirmed hazardous



materials before undertaking a building remodel, renovation or demolition.

Estimated Value: \$5,000+ | Estimated Timeline: 1-2 months

The RBM survey is comprised of three parts:

Part 1 – Work Plan: If you would like to move forward with a RBM survey, Stantec will prepare a Sampling and Analysis Plan (SAP) for your review and approval prior to submitting the document to EPA. A cursory review of exterior and interior building conditions may be necessary to aid in the formulation of a survey and sampling strategy.

Part 2 – Fieldwork: After the SAP is approved by EPA, building materials samples will be collected and submitted to a laboratory for analysis.

Part 3 – Final Report: A RBM Survey Report will be prepared to summarize the work performed, testing results and conclusions. A digital copy of the report will be provided for your review prior to finalizing the document.

NEXT STEPS:

If **no hazardous substances are confirmed**, no additional action is necessary. (Note: Worker protections based on local, state or Occupational Safety and Health Administration [OSHA] requirements may still apply.)

If **hazardous substances are confirmed**, Stantec will discuss the findings and available abatement options. A summary of cleanup options, cost estimates and risks related to the disturbance or disposal of confirmed substances can be prepared in a separate Analysis of Brownfield Cleanup Alternatives (ABCA) document.

FREQUENTLY ASKED QUESTIONS

What are the program's timeline and requirements?

Grant funding is committed until September 2021 and can be used to conduct ESAs, RBM surveys and related activities on eligible sites.

Will an ESA affect the value of my property?

It depends. An assessment itself does not directly affect property value. Property values are often negatively affected by uncertainty regarding site history and the financial and legal risks of potential environmental impacts. ESAs allow property owners to quantify the amount of contamination on a property (if any). For properties with little to no contamination, this knowledge may increase marketability. For sites with significant contamination, having an assessment completed using EPA funding removes this as a potential cost to be paid for by the property owner or an interested buyer as part of their due diligence process. Having assessments completed can help to better position properties for grants or tax incentives that can be used to pay for cleanup and support redevelopment.



Will I have control over the work done through this program?

You will have the right to stop participation in the program at various phases of the assessment process. You will be asked to grant property access to Stantec (the environmental consultant who will perform all work as directed). You will receive final reports throughout the assessment process.

Is the project limited to a specific area?

Both privately and publicly owned sites throughout the six-county area served by PHRCDC (Fulton, Hancock, Henderson, Knox, McDonough, Warren Counties) are potentially eligible for use of funding. It is anticipated that approximately 50% of funding will be allocated to sites within the four largest cities (Canton, Galesburg, Macomb, and Monmouth) and the remaining funding allocated to sites in smaller municipalities and unincorporated areas throughout the six-county area.

How will decisions be made on whether work at a specific site will be funded?

In general, all sites that are nominated will be given consideration for funding. Upon receipt of a nomination form, an initial review will be conducted by PHRCDC and Stantec to determine whether the site is a good fit for the program (based on its potential to support economic, environmental, or community goals), as well as whether it likely to meet the EPA site eligibility requirements. The site will then be "scored" based on a set of economic, environmental, and community benefit criteria established by a Brownfields Advisory Committee (BAC) that includes representatives from the PHRCDC, the six counties, and the four largest cities. Sites/projects will also be evaluated on the likelihood that they will be deemed eligible for use of funding, the certainty of securing site access to perform assessment activities, and other factors. The BAC will make decisions as a group on allocation of funding to individual sites and to specific requested assessment or remedial/reuse planning activities.

What's the catch?

There is no catch and participation is voluntary! Phase I/II ESA and related activities can be conducted on eligible sites using grant funds. Submit a Site Nomination Form (described under Step 1 of this Process Guide) to find out if your property is eligible for grant funding.

CONTACT INFORMATION

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