

Former Ohio Leatherworks Narrative/Ranking Criteria for Cleanup Grants (170 pts.)

IV.E.1 Project Area Description and Plans for Revitalization (50 pts.)

IV.E.1.a Target Area and Brownfields (15 pts.)

IV.E.1.a.i Background and Description of Target Area (5 pts.)

The City of Girard is a small community located in the Mahoning River Valley, directly north of Youngstown and approximately halfway between Cleveland and Pittsburgh. Girard is located in the heart of the Valley, and historically, the city's economy and challenges have been closely linked to the other communities along the river and the industries which sprang up along its banks. At one time, the Mahoning Valley region produced the second-highest amount of steel in the U.S., after Pittsburgh. The entire region suffered significant decline following the closure of Youngstown Sheet and Tube in 1977, which resulted in the loss of roughly 50,000 jobs. More recently, the community has suffered due to the 2019 deallocation and subsequent closure of the General Motors Lordstown Assembly Plant, just west of Girard, which employed roughly 5,400, and related supplier companies.

IV.E.1.a.ii Description of the Brownfield Site(s) (10 pts.)

The approximately 11.845 acre former Ohio Leatherworks site's operational processes included washing, fleshing, depilation, bathing, tanning, dying, and tempering animal hides with chemicals including sodium sulfide, sodium chloride, lime, ammonia salts, sulfuric acid, chromium sulfate, and mercury between approximately 1902 and 1972. More recent activities included material storage (e.g., titanium shavings, 55-gallon drums, and totes of high pH solids) from approximately 1974 and through 1994. The Property has been vacant since 1994, incurring a large fire in 1995. The remaining onsite structures are overgrown with vegetation and include an underground hide transport tunnel, a pump house, two lagoons, building foundations and several pits.

The proposed site and adjacent Mahoning River are separated by a transportation thoroughfare.

IV.E.1.b Revitalization of the Target Area (20 pts.)

IV.E.1.b.i Reuse Strategy and Alignment with Revitalization Plans (10 pts.)

The cleanup of this site aligns with three of the six major priorities identified in the City of Girard's 2017 Comprehensive Plan: first, to prepare underutilized former industrial and commercial sites for future redevelopment; second, restore the integrity of the Mahoning River; and third, to connect park and recreational amenities into a cohesive network. The end-use plan for the former Ohio Leatherworks site accomplishes all three of these goals, providing a developable site for future economic growth, remediating a brownfield along the river corridor, and providing a point of access to future recreational use of the Mahoning River corridor.

The bulk of the acreage at the former Ohio Leatherworks site was specifically identified in the comprehensive plan for cleanup and for future light industrial development. Once the site has been cleaned, it will be added to the state of Ohio's economic development site database and

marketed for new investment to site selectors and companies. Future development at the site will be evaluated for assistance from state and local incentives.

The cleanup of this site also aligns with the goals of the US-422 Corridor Redevelopment Plan, adopted in 2015. This multi-jurisdictional effort addresses jobs growth, site development, business support, neighborhood stabilization, and natural resources enhancement.

The City plans to use a portion of the former Leatherworks property as a link to a mixed-use recreational trail along the Mahoning River. The US-422 Plan proposes a trail alignment connecting this spur, tentatively named the Mahoning River Bikeway, south towards Mill Creek Metropark and downtown Youngstown, and north towards the Niles Greenway and Great Ohio Lake-to-River Greenway. Additionally, a new small craft launch, funded by Ohio Department of Natural Resources, was completed on the Mahoning River in Girard in 2017.

A small northern portion of the former Leatherworks site, adjacent to Little Squaw Creek, is located within a federally-designated 100-year floodplain, and this area will not be developed.

IV.E.1.b.ii Outcomes and Benefits of Reuse Strategy (10 pts.)

Redevelopment of the Leatherworks property will provide two important benefits to the residents of Girard: first, a small portion of the property will provide a trailhead location for the planned Mahoning River bikeway, a proposed spur of the Great Ohio Lake-to-River Greenway.

Second, upon completion of the project, the majority of the property (approximately 5-7 acres) will be made available for new commercial/industrial development. Since the Leatherworks property is located within one of the recently designated federal Opportunity Zones (OZ), the site is included in the recently launched regional investment prospectus and will be promoted to local and nonlocal investors looking for OZ projects. The site will also be marketed for redevelopment through Ohio's database of OZ projects, as well as on ZoomProspector, the state of Ohio's database of available properties.

Successful redevelopment of the site will spur needed economic growth in this OZ. For example, construction of a 50,000 SF light manufacturing project could result in the addition of 53 construction and 120 permanent new jobs [direct, indirect and induced], \$2.7M in added construction and \$6.1M in added permanent annual payroll, and an additional \$911,000 per year in state and local taxes. Source for potential job creation and payroll impacts: IMPLAN.

The cleanup of the Leatherworks property also fits into larger regional efforts centering on the Mahoning River. Efforts are underway to remove the 9 legacy industrial dams along the river - 1 project is under construction, 1 is in design, 3 are funded, and the rest are in the planning stage. The removal of the dams and associated sediment will allow the river to flow freely, improving water quality and restoring natural habitats.

IV.E.1.c Strategy for Leveraging Resources (15 pts.)

IV.E.1.c.i Resources Needed for Site Reuse (10 pts.)

Once the cleanup is completed, the site will be marketed for commercial development opportunities by the Youngstown/Warren Regional Chamber, which will create an online profile for the site in ZoomProspector, the state of Ohio's site database. The site will be submitted for all appropriate property searches for which it meets the basic requirements. The YWRC will also

assist potential developers with additional due diligence as necessary to ensure the most appropriate reuse of the site. Once an end user has been identified, additional funding sources to improve the site (through JobsOhio Revitalization funds) will be explored and leveraged.

IV.E.1.c.ii Use of Existing Infrastructure (5 pts.)

The Leatherworks property is located in an industrialized urban area, and all appropriate utilities and infrastructure (4-lane highway, electricity, natural gas, water, sewer, and communications) are available to the site. Future development at the site should not require upgrades except to tie into existing infrastructure.

IV.E.2 Community Need and Community Engagement (35 pts.)

IV.E.2.a Community Need (20 pts.)

IV.E.2.a.i The Community's Need for Funding (5 pts.)

According to the US Census Bureau's QuickFacts Community Profile, approximately half of the land within the City of Girard, including the project site, qualify as possessing greater than 51% of Low to Moderate Income populations, including 16.7% of the population living below the poverty line. Trumbull County has an unemployment rate of 6.1%, which far exceeds the state average of 4.3%. (Ohio Department of Job and Family Services, Ohio Unemployment Rates 2018 Annual Average). The high unemployment and low income limit the income tax collected by the city and hampers the community's ability to pay for brownfield site cleanups of this nature.

IV.E.2.a.ii Threats to Sensitive Populations (15 pts.)

IV.E.2.a.ii.1 Health or Welfare of Sensitive Populations (5 pts.)

According to the US Census Bureau's QuickFacts Community Profile, a number of Sensitive Populations exist within Girard, including:

- Approximately half of the land within the City of Girard, including the project site, qualify as possessing greater than 51% of Low to Moderate Income populations
- Girard's percentage of population 65 years and older, 18.3%, is greater than Ohio's (17.1%) and the USA (16.0%).
- 16.7% persons live in poverty
- 11.8% persons under age 65 have a disability (years 2013-2017)

The Pre-Remedial VAP Phase II Property Assessment conducted in 2016 includes a PROPERTY-SPECIFIC RISK ASSESSMENT (PSRA) that identified complete exposure pathways, such as direct-contact with near surface contaminated soil, that threaten human health. This grant will provide the funding needed to develop and implement remedies that will eliminate these exposures to our sensitive populations.

IV.E.2.a.ii.2 Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 pts.)

The Centers for Disease Control and Prevention's Environmental Public Health Tracking tool collects, analyzes and reports information at the county level and, according to the Trumbull County Combined Health District's Epidemiologist, the findings cannot be attributed to possible effects from pollution at this site. The findings of environmental indicators data generated using

USEPA’s EJSCREEN: Environmental Justice Screening and Mapping Tool show the population of Block Group 391559339001, which contains the project site and is the smallest geographic unit for reporting, do not have health concerns greater than the state, EPA region and USA averages.

The PSRA identified multiple exposure pathways that exceed maximum concentrations or VAP risk goals. Remedies that will eliminate these exposures will minimize the potential of generating a greater than normal incidence of disease and adverse health conditions in the community surrounding the site.

IV.E.2.a.ii.3 Disproportionately Impacted Populations (5 pts.)

The project site is located within OH Block Group 391559339.001. According to the USEPA's Environmental Justice Online Tool, 61% of the population residing in this Block Group are classified as a Low Income Population, compared to 33% for the State of Ohio and also 33% for the USA. There is potential that children from this abutting impoverished neighborhood will trespass on the site and come into direct contact with lead-impacted soil. Preliminary discussions for the reclaimed use include a mixed use commercial/recreation component. The desires of the neighboring population will be incorporated into the reclamation plan.

Dust monitoring will occur during the cleanup to ensure that lead and small particulate air emissions will be controlled and will not adversely impact the surrounding residents.

IV.E.2.b Community Engagement (15 pts.)

IV.E.2.b.i Project Partners (5 pts.) and IV.E.2.b.ii Project Partner Roles (5 pts.)

List of Project Partners		
Partner Name	Point of contact (name, email & phone)	Specific role in the project
Youngstown/Warren Regional Chamber	Lauren Johnson, lauren@regionalchamber.com, 330-744-2131	The Youngstown/Warren Regional Chamber (YWRC) represents the business community of the Mahoning Valley, with over 2500 members, and also serves as the lead organization and state of Ohio's local partner for economic development. YWRC will coordinate business engagement, as well as market the site for new development, and coordinate additional resources that will support reuse of the site.
Trumbull County Planning Commission	Julie Green, pcgreen@co.trumbull.oh.us, 330-675-2480	The Trumbull County Planning Commission (TCPC) provides services to the City of Girard including comprehensive planning, zoning and land use advising, enterprise zone management, floodplain administration,

		park and trail planning, and more. The TCPC will assist with community outreach, grant writing and technical assistance, grant administration, and GIS mapping.
Girard Multi-Generational Center	Laura Carey, lcd@multigen.org , 330-565-6596	The Girard Multi-Generational Center will assist with community outreach and provide meeting space for project updates.
Girard Free Library	Roseann Lubert, 330-545-2508 ext. 105, Lubertr@girardfreelibrary.org	The Girard Free Library will assist with community outreach and provide meeting space for project updates.
Girard 2 nd and 3 rd Ward Block Watch	Mary Ellen Pellegrini, 330-545-0497, mepellegrini@aol.com	The 2 nd and 3 rd Block Watch will assist with community outreach and encourage residents to provide input on the project.

IV.E.2.b.iii Incorporating Community Input (5 pts.)

The project team has sought community input on the former Ohio Leatherworks property at community meetings prior to beginning the grant process, including two meetings in September with City of Girard block watch groups.

The project team will provide quarterly written updates to the community via the City's website, written updates included with City water bills, as well as annual updates to City Council, and periodic updates to interested groups and parties (for example, block watches) by request.

All communications will include a designated point of contact, the project director, to receive and process questions and feedback via phone, email, or in-person updates on the project. The project director will track all comments and questions, will provide a summary of questions to the team, and will ensure that feedback is incorporated into the project where possible and that each inquiry receives an appropriate response.

IV.E.3 Task Descriptions, Cost Estimates, and Measuring Progress (60 pts.)

IV.E.3.a Proposed Cleanup Plan (10 pts.)

The cleanup takes full advantage of the flexibility of the Ohio EPA VAP to meet all applicable environmental laws and regulations, while maximizing protections of human health and the environment, and minimizing the overall cost. The preferred approach will combine source removal and replacement or placement of 2-feet of clean soil over areas impacted by metals and co-mingled petroleum contamination in portions of the site; institute practical land use restrictions (e.g., mandate commercial/industrial land use over portions of the site and prohibit ground water use); and implement a Risk Mitigation Plan (RMP) to protect future construction/excavation workers from potentially impacted soil exceeding direct-contact standards. It is estimated that 8,015 tons of contaminated soil will be required to be removed from the site and disposed of at a properly licensed landfill. Institutional controls consisting of

prohibiting ground water use and limiting specific portions of on-site land use to commercial/industrial activities will also be employed.

IV.E.3.b Description of Tasks/Activities and Outputs (25 pts.)

IV.E.3.b.i Project Implementation (10 pts.)

The EPA-funded activities will include the work of a Qualified Environmental Professional (Certified Professional under the Ohio EPA Voluntary Action Program) who will prepare and implement the Quality Assurance Project Plan and oversee the cleanup activities performed by the Remediation Contractors. The Property cleanup will be conducted under the MOA Track of the Ohio EPA Voluntary Action Program, including necessary health monitoring activities.

IV.E.3.b.ii Anticipated Project Schedule (5 pts.)

Cleanup of the Leatherworks Property will be completed within three years (36 months). Planned and achievable EPA-funded activities include preparation of soil remediation bid documents (3 months), bid solicitation/contractor selection (1.5 months), remedial soil actions (3 months), confirmation sampling/analysis (1 month), remedial action report (2 months), and the no further action letter preparation/covenant not to sue document (2 months).

IV.E.3.b.iii Task/Activity Lead (5 pts.)

Activities will be completed by the Project Team: the City of Girard (Applicant, fiscal agent), the Youngstown-Warren Regional Chamber (reporting and redevelopment) the Trumbull County Planning Commission (reporting, administration, community outreach, mapping), and Environmental Consultant - VAP Certified Environmental Professional (environmental work, monitoring, and reporting to applicable standards). Environmental tasks are as follows:

Task 1: Project Management & Coordination - The Environmental Professional will manage the remedial project tasks and coordinate with Project Team members, the USEPA Project Manager and the Ohio EPA VAP site coordinator. A Quality Assurance Plan (QAPP) for hazardous substances cleanup will be prepared. Following the public comment/response period, the final ABCA document and a Remediation Contractor scope of work for competitive bid will be completed. Entry of the site into the Ohio EPA VAP MOA Track will also be performed under this task.

Task 2: Remedial Actions - The soil Remediation Contractor work will generally consist of the excavation, transportation, and disposal of contaminated soil and the replacement with clean soil under the direction of the Environmental Professional. The Environmental Professional will direct and document the excavation activities to be performed by the Remediation Contractor. The soil Remediation Contractor will be responsible for providing all labor, material, equipment, and any permits that may be required to perform the remedial actions.

Task 3: Confirmatory Sampling - The Environmental Professional will obtain samples for analysis of chemicals of concern along the proposed excavation to confirm that the contamination perimeter meets the appropriate VAP standards (e.g., 800 mg/kg limit for lead within a depth of 0-2 feet). Waste characterization sampling and analysis for toxicity characteristic leaching procedure (TCLP) of soil for disposal must also be conducted prior to off-site disposal.

Task 4: Risk Assessment/Modeling - The Environmental Professional will complete a post-remedial Risk Assessment for the Property to incorporate a Multiple Chemical Adjustment (MCA) into generic VAP standards based on the final residual levels of contaminants in accordance with the Ohio EPA VAP rules. Ground water modeling and contaminant fate and transport modeling will be performed to demonstrate that residual contaminant levels will not adversely impact human health or ecological receptors at the adjacent Squaw Creek and/or Mahoning River.

Task 5: Risk Mitigation Plan - The Environmental Professional will complete a Risk Mitigation Plan (RMP) which will protect workers in the event that future subsurface construction activities encounter contaminated soils. The RMP will also provide guidelines for properly managing contaminated media that may be encountered during construction activities and requirements for restoring any breaches of the point of compliance on the Property.

Task 6: Remediation Report Preparation & Phase I Update -The Environmental Professional will complete a Remediation Report to summarize the remedial actions implemented on this project. The Phase I report will also be updated in accordance with VAP rules which stipulate that a Phase I report must be completed or updated within 180 days of submittal of a No Further Action (NFA).

Task 7: NFA Document Preparation - This task will entail the preparation of the NFA document as well as follow up responses to comments from the Ohio EPA review of the NFA.

IV.E.3.b.iv Outputs (5 pts.)

Specific project outputs will be programmatically required and easily measured because the project will be performed under the Ohio EPA VAP MOA Track. These include the Phase I update, final Remedial Action Plan, Remediation Completion Report, Risk Management Plan, Risk Assessment, and NFA documents. Progress toward project outputs will be measured by monthly progress meetings between the City and the Environmental Professional, regular public meetings and updated ACRES entries.

Budget Categories					
	Proj Mgt. Coordination	Remedial Actions and Confirmatory Sampling	Risk Assessment /Modeling and Risk Mitigation Plan	Remediation Report Prep, PHI Update, NFA Prep	T O T A L
					0
Personnel *					0
Fringe Benefits *					0
Travel *					0
Equipment *					0
Supplies*					0

Contractual*	12,730	416,307	21,420	48,580	499,037
Other*					0
Total Direct Costs	12,730	416,307	21,420	48,580	499,037
Indirect costs					0
Total Federal Funding (=<500K)	12,730	416,307	21,420	48,580	499,037
Cost Share (20% of federal Funds)		100,000			100,000
Total Budget (Total Direct+Indirect+ Cost Share)	12,730	516,307	21,420	48,580	599,037

Cost Basis Notes:

Task 1 – Project Management & Coordination

- 120 hrs. @ \$106/hr. (weighted average rate) = \$12,730.

Task 2 – Remedial Activities and Confirmatory Sampling

- Oversight 200 hrs. @ \$86/hr. (weighted average rate) = \$17,200.
- Soil Removal/Disposal/Replacement 3,430 tons @ \$96/ton = \$329,280.
- Imported clean fill cover soil 3,083 tons @ \$26/ton = \$80,158.
- Related Contractor cost (e.g., mob/demob, site clearing, AST removal) = \$72,409.
- Environmental Geologist 40 hrs. @ \$80/hr. = \$3,200.
- Subcontractors (Drilling and Laboratory) = \$14,060.

Task 3 – Risk Assessment / Modeling and Risk Mitigation Plan

- 158 hrs. @ \$104.56 (weighted average rate) = \$16,520.
- 50 hrs. @ \$98/hr. (weighted average rate) = \$4,900.

Task 4 – Remediation Report Preparation, Phase I Update, NFA Document Preparation

- 116 hrs. @ \$89.14 (weighted average rate) = \$10,340.
- 196 hrs. @ \$93.06/hr./ (weighted average rate) = \$18,240.
- Ohio EPA Filing Fee = \$20,000.

IV.E.3.d Measuring Environmental Results (5 pts.)

Several significant project **outputs** are referenced within the schedule, task descriptions, and cost estimates provided above. These outputs include the following:

- Project Preparation Document Outputs: QAPP, Final ABCA, Scope of Remedial Actions and Bid Specifications
- Project Execution Outputs: Remediation Activities Report, Phase I Update, Risk Assessment Report, Risk Mitigation Plan, and Operation & Maintenance Plan (for engineering controls), ACRES reporting

- Project Close Outputs: No Further Action documentation submitted to the Ohio EPA, Covenant Not to Sue issued by the Ohio EPA, and ultimately a mitigated Site ready for re-development.

As previously noted, these outputs are incorporated in to the project schedule and will be tracked through monthly progress meetings to ensure timely completion. The costs associated with these separate outputs are included in the budget so that the cost of achieving each output can be monitored and corrective action can be taken, as may be necessary, to ensure project completion within the allotted funding.

IV.E.4 Programmatic Capability and Past Performance (25 pts.)

IV.E.4.a Programmatic Capability (15 pts.)

IV.E.4.a.i Organizational Structure (5 pts.)

The Project Team includes the City of Girard as the Applicant, partnering with the Trumbull County Planning Commission, the Youngstown-Warren Regional Chamber and the city's consultant; Brownfield Restoration Group, LLC. Project partners have extensive experience administering a variety of grant programs including Ohio EPA grants and loans such as the Home Sewage Treatment System Reserve Program and the Water Pollution Control Loan Fund. Individual team members have also contributed to developing a successful WRRSP grant application through the Mill Creek Metro Parks. Brownfield Restoration Group, LLC has extensive knowledge and expertise with environmental assessment and implementation of successful remedial strategies. The combined education and experience of the Project Team assures that the proposed Leatherworks Clean-Up Project, if funded, will be successfully completed within 3 years.

IV.E.4.a.ii Description of Key Staff (5 pts.)

Our Team	Responsibilities	Years of Experience
Mayor James J. Melfi, City of Girard	Applicant, Fiscal Agent, Procurement of consultant and remediation contractor	35 Years experience in local government
Councilwoman Lily Martuccio, City of Girard	Applicant, Fiscal Agent, Procurement of consultant and remediation contractor, Community Outreach	23 Years experience in MetroParks operations, trail planning, local government and community development, BA
Lauren Johnson, Youngstown-Warren Regional Chamber	Grant writing and administration (including reporting), Redevelopment of site	4 Years experience in economic and community development, BA in Government
Julie M. Green, Director, Trumbull County Planning Commission	Technical assistance for procurement, Grant writing and administration (including reporting)	20 Years' experience in grants, planning and project management, MS Geography
Nicholas Coggins, Assistant Director, Trumbull County Planning Commission	Technical assistance for procurement, Grant writing and administration, Community	5 Years' experience in grants, BA in Communication Studies, OEPA Granting Writing 101

	Outreach	&102 certifications
Thomas J. Kieran, Trumbull County Planning Commission	Technical assistance for procurement, Grant writing and administration, GIS Mapping	18 Years' experience in land use planning and GIS, BA in Geography

IV.E.4.a.iii Acquiring Additional Resources (5 pts.)

The Team has already acquired additional expertise and resources in procuring through a competitive RFQ process meeting the requirements of 2 CFR 200.317 through 2 CFR 200.326 the services of Brownfield Restoration Group, LLC (BRG) to assist with the successful completion of the project. BRG will provide environmental professional (and VAP certified professional) services, has experience on several previous USEPA Brownfield grants, and will oversee the acquisition of additional resources as necessary, such as qualified remediation contractors, analytical laboratory, and drilling.

IV.E.4.b Past Performance and Accomplishments (10 pts.)

IV.E.4.b.i Currently Has or Previously Received an EPA Brownfields Grant (10 pts.)

IV.E.4.b.i.1 Accomplishments (5 pts.)

IV.E.4.b.i.2 Compliance with Grant Requirements (5 pts.)

IV.E.4.b.ii Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (10 pts.)

IV.E.4.b.ii.1 Purpose and Accomplishments (5 pts.)

The City of Girard has NOT received an EPA Brownfield Grant but has received other federal or non-federal assistance agreements including but not limited to \$2,114,000 in CDBG and HOME funds over the last 10 years through the Ohio Development Services Agency for a number of projects including street and sidewalk improvements, demolitions, fire hydrant replacements, residential rehabilitation and more; \$20,420,351.16 in OEPA OWDA Loans over the last two decades with an open loan in progress for upgrades to the WWTF; \$200,000+ in ODNR funds for a canoe livery and numerous park improvements, and \$4,400,000 in OPWC funds for various public infrastructure projects. Girard's experience administering grants is extensive and the City is confident that it will successfully carry out the USEPA Cleanup Grant if it is awarded.

IV.E.4.b.ii.2 Compliance with Grant Requirements (5 pts.)

The City of Girard has achieved the expected results of the grants described above as identified in the formal grant agreements and tracks these via state audits as well as through monitoring visits conducted by the various agencies. Measured progress is tracked via reports submitted to the various agencies.

IV.E.4.b.iii Never Received Any Type of Federal or Non-Federal Assistance Agreements (5 pts.)

Does not apply.