



### Applicant Information Sheet

Applicant Identification	City of Streator 204 South Bloomington Street Streator, IL 61364
Website URL	<a href="https://www.ci.streator.il.us/">https://www.ci.streator.il.us/</a>
Funding Requested	a) Assessment Grant Type: Community-wide b) Federal Funds Requested: \$500,000
Location	a) Streator b) LaSalle and Livingston Counties c) Illinois
Target Area and Priority Site Information	<ul style="list-style-type: none"> <li>• The target area discussed in the Narrative consists of the entirety of municipal limits based on its extremely limited size (7.3 square miles); however, proposed assessments will focus on a 99-acre portion of the larger 124-acre former Smith-Douglas, Inc. fertilizer manufacturing plant property.</li> <li>• The priority sites proposed in the Narrative do not have an assigned address. Livingston County identifies the priority sites as being entirely within the following Parcel Identification Numbers (PINs), although their borders do not directly align: <ul style="list-style-type: none"> <li>• 020207101002</li> <li>• 020207101005</li> <li>• 020207101004</li> <li>• 020207176001</li> <li>• 020207176002</li> <li>• 020207176007</li> </ul> <p>The center of the priority sites are further identified by the approximate latitude 41.0875° North and longitude -88.8079° West.</p> </li> <li>• A map visually depicting the target area and priority sites is included as an attachment to this Applicant Information Sheet.</li> </ul>

<p>Contacts</p> <p>a) Project Director:  Mr. Jeremy Palm, P.E., City Engineer  Phone: (815) 822-0335  E-mail: <a href="mailto:j.palm@cityofstreator.org">j.palm@cityofstreator.org</a>  Mailing Address:  City of Streator  204 South Bloomington Street  Streator, IL 61364</p>	<p>b) Chief Executive/Highest-Ranking Elected Official  Ms. Tara Bedei, Mayor  Phone: (815) 672-2517  E-mail: <a href="mailto:t.bedei@cityofstreator.org">t.bedei@cityofstreator.org</a>  Mailing Address:  City of Streator  204 South Bloomington Street  Streator, IL 61364</p>
<p>Population</p>	<p>12,500 (2020 Decennial Census)</p>
<p>Other Factors</p>	<p>The City is claiming the following Other Factors as part of this proposal:</p> <ul style="list-style-type: none"> <li>• Community population is 15,000 or less (Page 1)</li> <li>• The priority site(s) is impacted by mine-scarred land (Pages 1 and 2)</li> <li>• The priority site(s) is adjacent to a body of water (Pages 1 and 2)</li> <li>• The priority site(s) is in a federally designated flood plain (Page 1)</li> <li>• The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy (Page 3)</li> </ul>
<p>Letter from the State Environmental Authority</p>	<p>A letter from the State Environmental Authority is attached to this Applicant Information Sheet.</p>
<p>Releasing Copies of Applications</p>	<p>Not applicable</p>

**APPLICATION INFORMATION SHEET ATTACHMENT:**

1. LETTER FROM STATE ENVIRONMENTAL AUTHORITY
2. TARGET AREA AND PRIORITY SITES MAP



# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2520 WEST ILES AVENUE, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JAMES JENNINGS, ACTING DIRECTOR

217/785-8726

1/23/2026

City of Streator  
ATTN: Mayor Tara Bedei  
204 South Bloomington Street  
Streator, IL 61364

**Subject: State Acknowledgement Letter for the City of Streator  
FY2026 US EPA Brownfield Community Wide Assessment Application**

Dear Mayor Tara Bedei,

The Illinois Environmental Protection Agency (Illinois EPA) has received your request for a letter of acknowledgement for an upcoming Community Wide Assessment Grant application to U.S. EPA. The City of Streator is applying for a \$500,000 Community Wide Assessment Grant.

The grant will be a Community Wide Assessment Grant for both Hazardous Substances and Petroleum.

Illinois EPA acknowledges City of Streator's efforts to obtain federal Brownfields funds for this project. The city of Streator has also received TBA funds from Illinois EPA for a portion of the site, but the data generated from the TBA's will be used to delineate the contamination found on site and the TBA funding is limited and will not support exhaustive cleanup or delineation on a site of this size. If you have any questions, I may be contacted at the above address or telephone numbers below, or at [Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov).

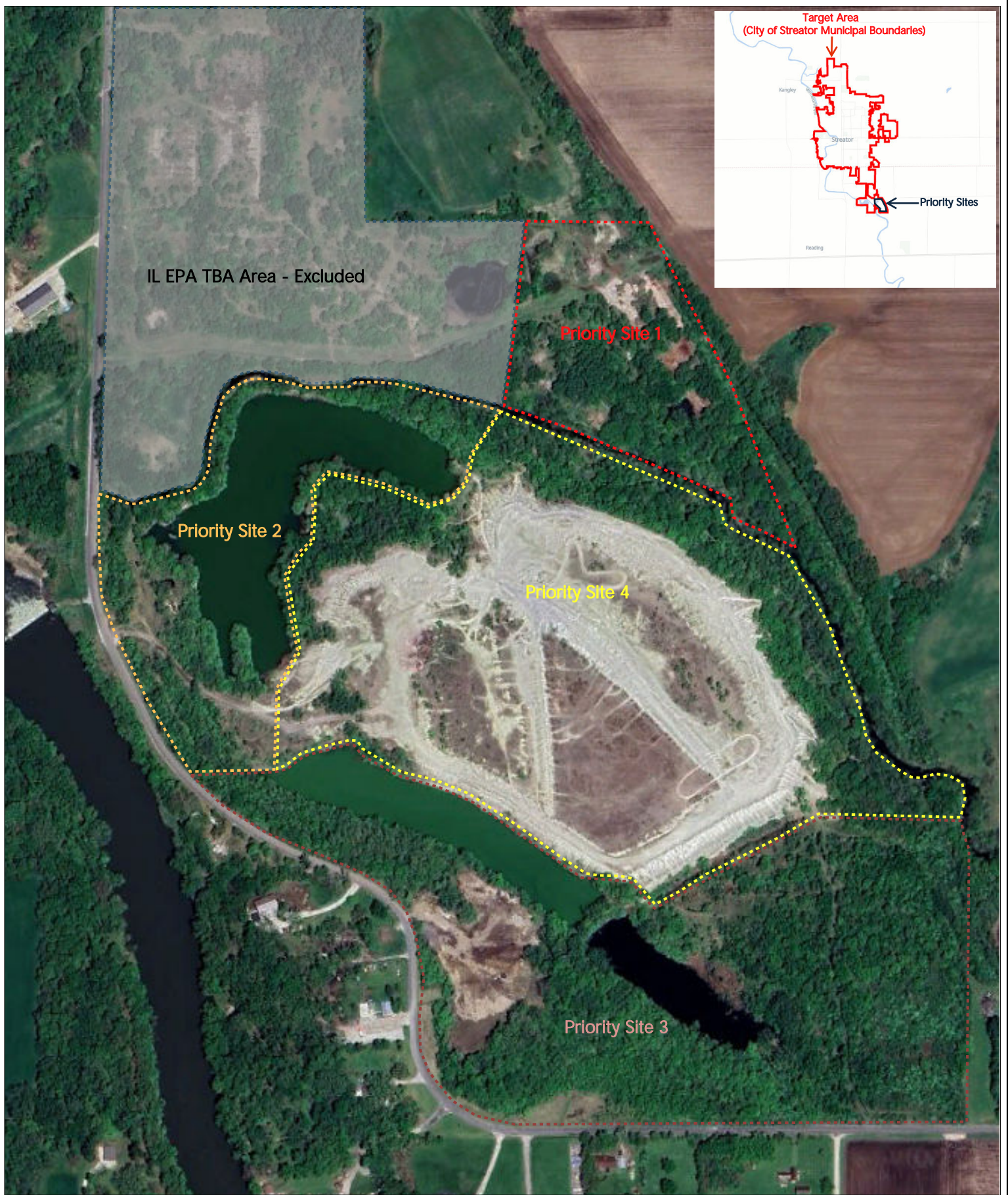
Sincerely,

Jacob Fink  
Brownfield Program Administrator  
Bureau of Land/Office of Site Evaluation  
Office# (217) 785-8726  
Cell# (217) 986-0818  
[Jacob.fink@illinois.gov](mailto:Jacob.fink@illinois.gov)



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412 SW Washington Street, Suite D, Peoria, IL 61602 (309) 671-3022  
4302 N. Main Street, Rockford, IL 61103 (815) 987-7760



IL EPA TBA Area - Excluded

Priority Site 1

Priority Site 2

Priority Site 4

Priority Site 3

Target Area  
(City of Streator Municipal Boundaries)

Kangley

Streator

Reading

Priority Sites



### Target Area Location Map

Smith-Douglas Site  
Smith-Douglas Road, Streator, IL 61364

#### Legend

- - - - - IL EPA TBA Area (Excluded Area)
- - - - - Priority Site 1
- - - - - Priority Site 2

- - - - - Priority Site 3
- - - - - Priority Site 4



Not To Scale

## **NARRATIVE**



## Narrative Criteria

### I. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

#### Target Area and Brownfields

a) Overview of Brownfield Challenges and Description of Target Area- Streator is a rural community of 12,500 located along the banks of the Vermillion River in north-central Illinois. Incorporated in 1882, labor-intensive industries historically shaped the area's physical landscape. Coal extraction, glass manufacturing, clay product development, brick and tile production, and railroad operations supported thousands of stable, well-paying jobs in the community for most of the late 19<sup>th</sup> and early 20<sup>th</sup> centuries. In fact, Streator was widely recognized as the "Glass Bottle Manufacturing Capital of the World" thanks to its abundant coal and silica sand supplies. The City's industrial capacity expanded to include fertilizer manufacturing by the mid-1940s, capitalizing on the region's agricultural enterprises. This milestone unfortunately coincided with the closing of two foundational area industries- coal mining and brick and tile manufacturing. These setbacks resulted in the loss of hundreds of jobs and important economic diversity.

More foreboding signs of Streator's instability and overdependence on a narrow employment foundation emerged in the early 1960s. Factors such as automation and increased national competition gradually reduced labor demand, leading to more company downsizing over the following decades. These vulnerabilities became especially acute in the 1980s. Thatcher Glass Manufacturing Company and Smith-Douglas Company, founded in 1905 and 1945, respectively, each filed for bankruptcy and ceased operations in 1985. Anchor Glass Container Company, founded in the early 1900s, added to the shock when it permanently closed in 1992. An estimated 1,000 jobs were eliminated in less than a decade as the sharp downturn saddled Streator with discarded industrial properties and no clear plan for cleanup.

The 124-acre former Smith-Douglas plant has remained abandoned for over forty years. Characterized by partial standing structures, radioactive waste, acid pools, mine-scarred land, and piles of gypsum, the site remains an enigma for local officials. Perimeter fencing installed to prevent unauthorized access is often damaged or removed. The police department routinely receives trespassing complaints as individuals indiscriminately use the property for riding dirt bikes, hiking, and fishing, thus unknowingly exposing themselves to contamination. **This proposal represents a culmination of efforts to transition the challenging industrial wasteland into a productive reuse that protects the long-term health of Streator residents.**

Although assessment activities will focus on the Smith-Douglas site along a bend of the adjoining Vermillion River in the southeast corner of the community within a federally designated floodplain (Zone A- 1% annual chance of flooding or the 100-year floodplain)<sup>1</sup>, this application considers all of Streator the target area due to its limited geographical extent (7.3 square miles) and population.

b) Description of the Priority Brownfield Site(s)- The priority brownfields sites (see table below) initially developed as two coal mines in the late 19<sup>th</sup> century before transitioning to tile and brick manufacturing in the early 1900s. Smith-Douglas Company later operated the land as a fertilizer plant from the mid-1940s through 1985. The intensive process required importing enormous quantities of phosphate ores for mixing to make the finished goods. Byproducts included a highly acidic and radioactive sludge irresponsibly stored in strip-mined areas across the site, as well as a significant amount of acidic water runoff channeled to onsite ponds. The operation also involved extensive, undocumented landfilling along the eastern portion of the site north of Phillips Creek. Suspected buried materials include solid and chemical waste generated at the main plant, sulfuric acidic water runoff, and spent process filters used during manufacturing which contain radium 226. Additionally, a reported bunker was used to store reactive and potentially explosive materials.

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<sup>1</sup> Federal Emergency Management Agency Flood Zone Map Panel 17105C0050E (effective 12/18/2007)



The plant’s closure left acid ponds, manufacturing waste, mine-scarred land, gypsum stockpiles, raw fertilizer products, and numerous other hazardous conditions completely unattended. The Illinois Environmental Protection Agency (IL EPA) sealed the site from the public on September 29, 1988 and later managed the removal of three underground tanks, 3,200 linear feet of asbestos pipe wrap, 1,000 containers of laboratory chemicals, 72,800 gallons of acidic liquids, 6,200 gallons of flammable liquids, 340 gallons of polychlorinated biphenyl liquid, 60 cubic yards of petroleum hydrocarbon contaminated soil, inorganic lab packs, 30 drums of vanadium pentoxide, 1,160 cubic yards of neutralized phosphoric acid, and 14 drums of water treatment chemicals in 1989. A Potentially Responsible Party (Borden) was identified in 1997 that signed an EPA Agreement Order to fund a Preliminary Facility Assessment. Borden also made repairs to the Fresh Pond berm tasked with holding tens of millions of gallons of highly acidic wastewater in 1999 based on concerns regarding structural integrity. To prevent a breach and subsequent ecological catastrophe, IL EPA forced authorized dewatering through 2015 that resulted in tens of millions of gallons of water being pumped to the Gypsum Stack and into Phillips Creek, approximately 250 feet upstream. Since that time, no further actions have been performed to address this berm.

Realizing the former Smith-Douglas plant would likely remain in its decades-long purgatory status, the City proactively acquired the entire site in 2018 after satisfying EPA’s All Appropriate Inquiry (AAI) rule.<sup>2</sup> Officials later partnered with IL EPA in securing Targeted Brownfields Assessment (TBA) technical and financial assistance to investigate a specific 20-acre portion of the former plant in 2025 (the attached map depicts the area in relation to the priority sites).

As outlined above, state and federal environmental agencies have spent considerable resources at the former Smith-Douglas site to address past and threatened releases of hazardous substances into the environment; however, the efforts were very targeted and primarily occurred within the 20-acre area currently being further investigated by the IL EPA. The absence of a thorough subsurface assessment on the remaining 99-acres, which also included operations that utilized and stored hazardous materials and have documented structural integrity concerns related to the acid pond berm designed to control the migration of known contaminants into the local environment, represent exposure risks to the community. Assessment is an imperative first step to begin mitigating these risks. The City has divided the balance of the former plant into the following four priority sites for investigation.

Priority Site <sup>3</sup>	Past Uses	Env. Issues	Current Use/Cond.
1. Landfill- 9 acres	Plant runoff, landfilling, explosives storage, & coal mining	IL EPA Target Compound List <sup>4</sup> , nitrates, phosphates, sulfuric acids, anhydrous ammonia, & radioactive waste	Abandoned landfill with runoff pond and mine-scarred land
2. Berm and Fresh Pond- 14 acres	Acid production runoff & assoc. waste storage at Gypsum Stack	IL EPA Target Compound List, nitrates, phosphates, and sulfuric acids	Berm preventing a breach from Fresh Pond
3. Cole’s Pond & New Pond- 35 acres	Acid production runoff & assoc. waste storage at Gypsum Stack & mining	IL EPA Target Compound List, nitrates, phosphates, and sulfuric acids	Two ponds containing runoff from Gypsum Stack and mine-scarred land
4. Gypsum Stack- 41 acres	Phosphate import, acid production, waste storage in strip-mining	IL EPA Target Compound List, nitrates, phosphates, and sulfuric acids	Gypsum stockpiles and storage of acid production waste in mine-scarred land

c. Identifying Additional Sites- The City does not anticipate expending any grant funding beyond the 99-acre portion of the former Smith-Douglas plant based on the extensive scope of work being

<sup>2</sup> Midwest Environmental Consulting Services, Inc., Phase I Environmental Site Assessment, Former Smith-Douglas Fertilizer Plant, 2065 N. 15<sup>th</sup> Road, Streator, IL 61364, July 18, 2018.

<sup>3</sup> None of the priority sites have an assigned address.

<sup>4</sup> IL EPA Target Compound List includes VOCs, SVOCs (w/ PAHs), PCBs, metals, and pesticides/herbicides.



proposed; however, the City will encourage citizens to identify additional sites within the target area for eligible activities at outreach events and via comment cards permanently available at City Hall and on the project website. Should funding remain following completion of investigations at the priority sites, city staff and project partners will prioritize suggestions based on reuse potential, job creation, blight elimination, and compliance with adopted plans. A direct response will be provided to individuals by e-mail or phone explaining whether the site was approved for use of funds. The City will create an inventory and explore future funding opportunities if unable to investigate each potentially qualifying brownfields site due to budget constraints.

#### Revitalization of the Target Area

d) Reuse Strategy and Alignment with Revitalization Plans- Reuse of the former Smith-Douglas plant has been a priority for the City since taking ownership in 2018, but its massive footprint proves challenging. Elected officials have adopted a process for tackling the site incrementally with the ultimate goals of 1) mitigating environmental risks and 2) facilitating long-term redevelopment opportunities. The City has already entered into a land lease option agreement for the reuse of the Gypsum Stack, priority site #4. AC Power, a trusted brownfields solar developer with similar projects on closed landfills, Superfund sites, and reclaimed mines in New York, New Jersey, and Illinois, has committed to installing and operating an approximately 7.5 MW-dc solar facility across 30-acres of the abandoned site. Approved by City Council Resolution 2024-54 on October 16, 2024, the agreement leases the property to the company for up to 25 years with two, five-year renewal options. Terms for the deal are \$13,500 per Megawatts of Direct Current (MW-DC) installed with a 3% annual escalation factor; however, the project viability hinges on the City's ability to remove lingering environmental uncertainties.

The City has not formally included the former Smith-Douglas site in any of its adopted long-range planning documents beyond the comprehensive plan's future land use map which tabbed it for agricultural use. Requested grant funding is thus critical to advancing the community's vision for the former plant. Specifically, the City will allocate a portion of the grant for a Site Reuse Assessment (see Section 3 below) to help identify potential reuse assets and barriers, as well as understand the range of sustainable reuse options for the priority brownfields sites. The inclusive process will offer an important voice for the most impacted target area residents.

e) Outcomes and Benefits of Reuse Strategy- Repurposing the Gypsum Stack will stimulate tremendous economic benefit to the community. Projected revenues earned by the City over the base length of the lease agreement with AC Power are estimated to exceed \$2.7 million. This figure will increase to approximately \$4.6 million should both five-year renewal options be exercised. More importantly, **any revenue generated by the renewable energy project will be directly invested back into the larger former Smith-Douglas property to address lingering contamination concerns.** The Streator City Council unanimously agreed to "...using these revenues towards completing future investigations and cleanup necessary to redevelop the remaining 85-acre portion of the property as determined by state and federal agencies" via Resolution 2025-44 on November 12, 2025. This commitment by elected officials demonstrates Streator's incredible resolve to protect its citizens and return this once productive site back into a community asset.

The proposed solar array will enhance Streator's resilience to the impacts of extreme weather events as part of a larger effort to deploy carbon-free, electricity-generating assets. The Site Reuse Assessment plan highlighted above will also intentionally study incorporating additional long-term resiliency measures at the priority sites as a specific chapter in the document.

#### Strategy for Leveraging Resources

f) Resources Needed for Site Reuse- The City is eligible to access funding from a variety of resources to supplement its environmental site assessment, remediation, and subsequent reuse efforts at its priority brownfields sites. The City already leveraged TBA assistance from IL EPA



in 2025 to supplement historical sampling activities across 20 acres of the former Smith-Douglas plant adjoining the four priority brownfields sites. The City will again utilize this source to satisfy eligible site-specific assessment as needed. Further, as detailed above, the City will have access to a stream of revenue dedicated to advancing the eventual reuse of its priority brownfield sites once the gypsum stockpile area and mine-scarred land is cleared for construction of the solar array. Streator City Council allocated the funds for future assessment and remediation as determined by state and federal agencies.

g) Use of Existing Infrastructure- The priority sites are located within an urbanized area of the community, meaning gas, electricity, water, sewer, and streets are available to serve the property. Should additional infrastructure needs or upgrades be required to support future revitalization of the priority site, the City will fund improvements through local funding options (general obligation bonds, tax increment financing, etc.) and state revolving loan funds offered by the IL EPA for wastewater/stormwater and drinking water projects, as available.

2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a) The Community’s Need for Funding- Streator does not have the financial capacity to pursue a comprehensive approach to addressing brownfields concerns within the community. A limited population of 12,500 and small tax base hinder the City’s ability to complete environmental assessment and/or remediation activities that stimulate reuse projects in the target area- especially considering the magnitude of the former Smith-Douglas plant. The City’s most recent audit from FY24 identified a surplus of only \$70,151 when considering the recorded general fund revenues and expenditures. The audit for FY25 is underway but projects to identify a similar surplus of ~\$75,000 against a budget of \$13.2 million.

The City is fully committed to investigating and redeveloping the 124-acre former Smith-Douglas property in its entirety, but the remaining need is on a much larger scale than its budget can absorb. In the absence of this EPA grant, the community cannot allocate enough funds to fully assess, characterize, and conduct cleanup planning on the four priority sites totaling 99-acres described above due to competing needs for extremely limited local resources.

b) Health or Welfare of Sensitive Populations- The target area is characterized by elevated levels of sensitive populations when contrasted with Illinois and the United States. The most recent American Community Survey (ACS) 5-Year Estimate (2023) with data available for Streator indicates the percentage of young children, defined as 5 years old or younger, residing within the community (6.0%) exceeds both the state (5.6%) and U.S. (5.7%) levels. Similarly, the presence of individuals aged 65 or older in Streator (21.2%) is several percentage points higher than the cohort’s makeup in Illinois (16.6%) and United States (16.8%). This situation is concerning as the pervasive historical use of hazardous substances and petroleum products at the former Smith-Douglas plant creates exposure concerns for Streator’s residents. Previous investigations at the 124-acre property have already documented media impacted by volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) including polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, herbicides, heavy metals, nitrates, phosphate, potash, sulfuric acid, anhydrous ammonia, sulfur, uranium isotopes and radium 226. Sensitive populations, especially young children, are often more susceptible to impacts from exposure to contaminants. The table below provides perspective on potential health effects.

Contaminant	Potential Health Effects
VOCs	Known carcinogen. Possible cardiovascular, organ growth, liver, immune problems.
SVOCs	Possible birth defects and liver/blood problems.
PAHs	Known carcinogen. Possible birth defects and liver/blood problems.
Heavy metals	Probable carcinogen. Cardiovascular, organ growth, digestive, hematological, musculoskeletal, neurological, ocular, urinary systems or kidneys, reproductive prob.



<b>Contaminant</b>	<b>Potential Health Effects</b>
PCBs	Probable carcinogen. Suspected immune, reproductive, nervous, endocrine impacts.
Pesticides and herbicides	Known carcinogen. Neurological, developmental, respiratory, immune, and hormonal problems.
Nitrates	Probable carcinogen. Exposure can lead to serious oxygen deprivation as well as developmental, thyroid, and gastrointestinal problems.
Sulfuric acid	Probable carcinogen. Severe respiratory, skin, eye, and gastrointestinal problems.
Anhydrous ammonia	Exposure can cause rapid and severe injury to the respiratory system, eyes, and skin.
Radiation	Known carcinogen. Exposure can lead to low bone density, skeletal deformities, bone marrow damage, and increased lifetime cancer risk of bone and blood cancers.

These circumstances are even more problematic when impacted populations lack the financial resources to relocate to areas experiencing fewer environmental impacts. Information from the 2023 ACS 5-Year Estimate indicates the target area is economically depressed. Median household income statistics portray the financial inequality as the figure (\$54,953) is 30.0% less compared to the U.S. (\$78,538) and 32.7% less than Illinois (\$81,702)<sup>5</sup>. Food insecurities also plague the target area due to limited earnings. To this point, three of the target area census tracts encompassing Streator (17099963700, 17099963800, and 17099964300) are defined as areas of persistent poverty meaning their respective rates have exceeded at least 20% over the proceeding 30 years<sup>6</sup>.

Public health benefits associated with the proposed grant project are clear: assessing and characterizing priority brownfields sites creates healthier neighborhoods by reducing risks to sensitive populations through the gathering of vital information and formulating appropriate responses. This is especially critical as it relates to the potentially failing earthen berm on priority brownfields site #2 that is designed to prevent acidic runoff onto neighboring properties and the nearby Vermillion River. Proposed investigations using a more comprehensive approach (i.e., sampling off all suspected contaminant constituents based on Phase I Environmental Site Assessment (ESA) findings, as opposed to historical investigations limited to known immediate releases to the environment) will also help officials make better-informed decisions relating to the potential need to safeguard human health through cleanup. This work ultimately culminates in improved local air, land, and water quality. Without intervention, the sensitive populations outlined above will continue to bear a disproportionate burden of environmental and health risks.

c) Greater Than Normal Incidence of Disease and Adverse Health Conditions- Health studies specific to the target area are not available; however, county-level health studies suggest the City’s brownfields may already be affecting residents<sup>7</sup>. Interaction with contaminants via direct contact, inhalation of airborne particulates, and/or vapor intrusion pathways expose individuals to known carcinogens or other health impairments.

National Cancer Institute (NCI) lists Livingston County’s cancer incidence rate (including all races, all ages, and both sexes) from 2017-2021 as 478.8 per 100,000 people<sup>8</sup>. This figure was dramatically higher than the U.S. and Illinois rates of 444.4 and 459.2, respectively. The NCI also listed the county death rate resulting from cancer (including all races, all ages, and both sexes) from 2018-2022 as 171.6 per 100,000, which exceeded the Illinois (150.2) and U.S. mortality rates (146.0), and placed its rate near the bottom third of Illinois counties (39 of 102). Past sampling activities at the former Smith-Douglas plant noted the presence of carcinogens that could be contributing to the raised cancer incidence and mortality rates.

<sup>5</sup> <https://data.census.gov/> (Accessed 12/16/2025)

<sup>6</sup> <https://maps.dot.gov/BTS/GrantProjectLocationVerification/> (Accessed 12/16/2025)

<sup>7</sup> Streator, IL falls within Livingston and LaSalle counties. This application uses the former as each priority brownfields site is located within it.

<sup>8</sup> <http://statecancerprofiles.cancer.gov> (Accessed 01/14/2026)



Proposed funding will allow the City to assess the sources of contaminants, quantify the presence of pollutants, and develop a suitable remedy to reduce exposure concerns. The City will facilitate enrolling sites requiring corrective action into IL EPA's Site Remediation Program (SRP). The program utilizes Risk Based Corrective Action levels based on EPA's cumulative increased cancer risk evaluations and requires public notification for all corrective actions.

d) Economically Impoverished/Disproportionally Impacted Populations- The target area faces numerous challenges that prevent it from being a healthy community. Streator's industrial past has created a legacy of negative environmental consequences for its residents. The Agency for Toxic Substances and Disease Registry (ATSDR)'s Geospatial Research, Analysis, and Services Program indicates two target area census tracts rank within the "high" quartile for environmental burden indicators when compared to the rest of the United States. This poor standing can primarily be attributed to the following per census tract: 17099963800- Toxic Release Inventory (TRI) sites (83<sup>rd</sup> percentile), Risk Management Plan sites (87<sup>th</sup> percentile), and potentially hazardous and toxic sites (88<sup>th</sup> percentile) and 17099964300- potentially hazardous and toxic sites (71<sup>st</sup> percentile), Treatment, Storage, and Disposal sites (84<sup>th</sup> percentile), and TRI sites (86<sup>th</sup> percentile)<sup>9</sup>.

Current conditions at the priority sites threaten local groundwater and thus the water wells used by target area residents for drinking water. The acidic pond located directly south of the former main plant is contained by a berm which exhibits significant integrity concerns. Both the U.S. Army Corps of Engineers and IDNR agreed a breach was impending in a 2006 *Health Consultation* study, and that it could cause an environmental disaster. Although dewatering activities were authorized in 2015 to prevent a flood event from Fresh Pond into public waterways, no further actions have been performed to address this berm. Documented historical floods in the area have inundated the City's water plant directly west of the former Smith-Douglas plant. IL EPA performed an inspection of the site in 2016 and observed evidence that the embankment of Phillips Creek had breached, resulting in flooding. These recorded flooding events demonstrate that even if the unstable berm were to hold, an upstream breach of Phillips Creek or a flood originating from the Vermillion River is possible. These flooding events have the potential to destroy the berm resulting in floodwater entering Phillips Creek, the Vermillion River, and washing out into the nearby residential homes to the south as well as the surrounding agricultural fields. This floodwater would contain high concentrations of nitrates, phosphates, and sulfuric acid which would readily leach into the subsurface soil and eventually into the groundwater.

As evidenced above, target area neighborhoods are comprised of comparatively higher concentrations of low-income residents often forced to live near facilities with documented environmental concerns. Historical investigations at the former Smith-Douglas plant demonstrate that impacted media is already present at priority sites thus potentially exposing economically impoverished individuals to known carcinogens and other harmful impacts at a disproportional rate. The requested funds are crucial to helping correct this injustice as additional sampling is necessary to better understand remaining challenges facing human health and the environment. Once contaminants are identified, quantified, and delineated, an appropriate response will be devised to reduce exposure (e.g., deed restrictions, remediation, etc.). Further, citizens most impacted by priority brownfields sites will directly benefit through 1) the known redevelopment project which will facilitate the creation of a renewable energy source for the community and 2) the yet-to-be determined project that they can help shape with meaningful input opportunities as the City and its partners develop the proposed Site Reuse Assessment outlined below (Task 4).

### Community Engagement

e and f) Project Involvement and Project Roles- Streator received commitments from three citizens to form a project partner committee and assist with the brownfields project. The City chose the community leaders as they represent various professions and organizations and boast intimate

<sup>9</sup> <https://www.atsdr.cdc.gov/place-health/php/eji/eji-explorer.html> (Accessed 01/14/2026)



knowledge of the area’s demographics, economy, and market conditions. City staff will coordinate with the stakeholders annually as part of the decision-making process for the outreach events, reuse planning activities outlined in task 4 in Section 3 below, and selection/prioritization of brownfields identified by the public for future investigation should funding remain after the four priority sites. The following table summarizes the individuals and their roles:

Partner	Point of Contact	Specific Role in Project
Streator Chamber of Commerce	N:Derek Barchello E: derek.b@streatorchamber.com	<ul style="list-style-type: none"> <li>• Marketing brownfields sites for reuse</li> <li>• Coordinate securing public meeting facilities</li> </ul>
Area business representative	N: Steve Broadus E: sbroadus@taylorcorp.com	<ul style="list-style-type: none"> <li>• Assist with identifying reuse opportunities</li> <li>• Spread project awareness to area businesses</li> </ul>
Area realtor representative	N: Patrick Chismarick [REDACTED]	<ul style="list-style-type: none"> <li>• Provide market conditions info during reuse</li> <li>• Market brownfields sites for reuse</li> </ul>

g) Incorporating Community Input- A robust outreach effort will regularly convey progress to the local community, project partners, and residents living near the priority brownfields sites. The City is using a variety of communication strategies to ensure equal access to information and make certain participant representation mirrors impacted populations (see table below). For instance, the City will provide interpreting services at public events to assist households that primarily speak Spanish. Materials (e.g., notices, comment forms, and brochures) will also be made available bilingually. Further, outreach meetings will occur in public facilities (e.g., cultural events center, school, etc.) at varying times to accommodate non-traditional work schedules. Approaches like posting investigation reports on a website will also improve project transparency, while using traditional mediums (e.g., a newspaper) better ensures older populations receive the information.

Mechanism	Frequency	Summary
Outreach Meetings	Annually	Interactive presentation to create dialogue with citizens and gather input. Held at public facilities at varying times for better attendance.
Proj. website/ social media	Continuous	Provides project transparency by posting environmental reports, news, photographs, and success stories. Comment forms offered.
Brochure	Continuous	Summarizes brownfields program. Available at City Hall and online.
Press Release	Annually	Provides update to a wide audience (internet, TV, radio, and newspaper).
Depository	Continuous	Public able to review copies of documents. Available at City Hall.

This project also provides an opportunity to empower people in taking control of their environment. The City will offer active (e.g., annual meetings) and passive (e.g., comment forms) opportunities for citizens to give meaningful input on preferred redevelopment alternatives for the priority brownfields sites as part of preparing a Site Reuse Assessment described below and in identifying additional sites for potential investigation in the target area should funds remain. City staff and its project partners will review all site selection feedback in accordance with the process outlined in the Identifying Additional Sites section above.

The City will utilize online audio/video conferencing like Zoom or Microsoft Teams during outreach meetings as an alternative to in-person community engagement. This will work seamlessly as the City routinely uses these platforms for both internal and external meetings.

### 3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

#### Description of Tasks/Activities and Outputs

Task/Activity: <b>Program Management (Task 1)</b>
a) Project Implementation: Task 1 involves satisfying the grant’s programmatic requirements such as procuring and overseeing a Qualified Environmental Professional, producing quarterly and annual reporting documentation, processing asap.gov drawdowns, attending meetings with regulatory agencies, and attending a national brownfields conference.
b) Anticipated Project Schedule: City will dedicate the grant’s 1 <sup>st</sup> quarter to issuing a request for qualifications (RFQ) and hiring a qualified contractor via federal procurement guidelines. City to



submit drawdowns monthly and reports as required (quarterly or annually) and meet with regulatory agencies as needed during project period. One city staff person to attend a brownfields conference.
c) Task/Activity Lead: City will procure a qualified contractor, assist contractor with preparing required documentation (i.e., quarterly progress reports or QPRs, grant closeout report, federal financial reports, and MBE/WBE forms), attend meetings with EPA/IL EPA, and manage project finances (e.g., process drawdowns). A staff member will also attend a brownfields conference. Contractor will help produce the required documents referenced above and lead EPA/IL EPA coordination efforts based on their technical expertise and knowledge of reporting expectations.
d) Outputs: 16 QPRs, 1 grant closeout report, 4 annual federal financial reports, and 4 annual MBE/WBE forms, as well as staff attendance at 1 national conference

<b>Task/Activity: Community Involvement (Task 2)</b>
a) Project Implementation: Task 2 involves informing and meaningfully engaging the public through the hosting of meetings, creation of outreach tools, and project partner coordination.
b) Anticipated Project Schedule: City will host an outreach meeting during the 2 <sup>nd</sup> quarter of Year 1 to inform residents of the project. End of Year 2 and 3 meetings will summarize investigation results while the latter will also seek public feedback as part of developing the Site Reuse Assessment. The last meeting in quarter 3 of Year 4 will cover project highlights and again seek public feedback to help finalize the Site Reuse Assessment. The City will create a project website and brochure during quarter 2 of Year 1 and issue press releases at the end of each year. City to engage project partners annually.
c) Task/Activity Lead: City staff will lead outreach meetings, prepare annual press releases, and coordinate project partner meetings. Contractor activities include preparation and attendance at 4 outreach and 4 project partner meetings and creating a project website and brochure based on their ability to communicate technical concepts regarding brownfield assessment and reuse to the public.
d) Outputs: 4 partner and 4 outreach meetings, 4 annual press releases, 1 brochure, and a project website

<b>Task/Activity: Site Assessment (Task 3)</b>
a) Project Implementation: Task 3 focuses on completing Phase I and II ESAs consistent with EPA’s All Appropriate Inquiry and current ASTM standards. The City will conduct ESAs on each priority site listed above, as well as at additional brownfields identified by the public if funding remains.
b) Anticipated Project Schedule: City will submit a Quality Assurance Project Plan (QAPP) and eligibility requests during the 2 <sup>nd</sup> quarter of Year 1. City will complete Phase I ESAs and Sampling Plans during 2 <sup>nd</sup> -4 <sup>th</sup> quarters of Year 1, Phase II ESAs during the 1 <sup>st</sup> -3 <sup>rd</sup> quarters of Year 2, and submit IL EPA SRP enrollment packages in the 4 <sup>th</sup> quarter of Year 2. The City will receive IL EPA approval of the Supplemental Phase II ESA Sampling Plans in the 1 <sup>st</sup> quarter of Year 3, conduct Supplemental Phase II ESAs in 2 <sup>nd</sup> -4 <sup>th</sup> quarters of Year 3, and submit SRP reports in the 1 <sup>st</sup> -2 <sup>nd</sup> quarters of Year 4.
c) Task/Activity Lead: City will submit eligibility requests, review report results, and vet brownfields sites identified by the public if funds remain. Contractor will prepare the QAPP, Phase I and II ESAs, ACRES Work Packages, and Phase II Work Plans and communicate ESA findings to EPA/IL EPA as necessary, based on their technical expertise and knowledge of the EPA Brownfields Program.
d) Outputs: 1 QAPP, 4 Phase I ESAs, 4 Phase II ESAs, 4 SRP enrollment packages, 4 Supplemental Phase II ESAs, and 4 SRP combined reports, with Work Packages and sampling plans (as applicable)

<b>Task/Activity: Reuse Planning (Task 4)</b>
a) Project Implementation: Task 4 involves completing an Analysis of Brownfields Cleanup Alternatives (ABCA) at each priority site complimented by reuse planning exercises designed to identify a productive redevelopment project(s) consistent with community desires.
b) Anticipated Project Schedule: City to complete the ABCAs and Site Reuse Assessment for the priority brownfields sites during Year 4.
c) Task/Activity Lead: Contractor to prepare the ABCAs and Site Reuse Assessment report with city staff/project partner assistance and feedback provided by an engaged citizenry.
d) Outputs: 4 ABCAs and 1 Site Reuse Assessment report



e) Cost Estimates- All cost estimates outlined below are based on staff conversations with environmental contractors experienced in assisting grantees implement Assessment Grants, as well as guidance on eligible planning activities obtained from EPA’s official website. Contractor costs cited below are estimated at an average hourly rate of \$130 to complete the task activities.

Task 1 (Program Management)- Contractor costs: \$27,400- complete programmatic documentation (\$14,400 for 16 QPRs, 4 Annual Federal Financial Reports, 4 MBE/WBE, and 1 FPPR) and lead project coordination with IL EPA and EPA (\$13,000). Travel Costs: \$2,350- A city staff person to attend a National Brownfields Conference (\$800/flight, \$750/hotel, \$400/car rental, and \$400/meals).

Task 2 (Community Involvement)- Contractor costs: \$44,500- preparation and attendance at four outreach meetings (\$4,500/event) and four project partner committee meetings (\$2,500/event) and creating a brownfields project website (\$13,000) and brochure (\$3,500). Supplies: \$300- printing costs for the brochure (200 color copies at ~\$140 and 20 outreach meeting posters at ~\$160).

Task 3 (Site Assessment)- Contractor costs: \$385,450- develop QAPP (\$10,000); conduct 4 Phase I ESAs (\$20,000 at \$5,000/report which includes eligibility requests and ACRES Work Packages), 4 Phase II ESAs (\$120,000 at \$30,000/report which includes Sampling Plans), 4 IL EPA SRP enrollment packages (\$40,000 at \$10,000/package which includes enrollment fees and Sampling Plans), 4 Supplemental Phase II ESAs (\$120,000 at \$30,000/report which includes Sampling Plans), and 4 SRP combined reports (\$75,450 at \$18,862.50/report which includes the site investigation completion report, remedial objectives report, and remedial action plan report)

Task 4 (Reuse Planning)- Contractor costs: \$40,000- 4 ABCAs (\$5,000/report) and 1 Site Reuse Assessment report (\$20,000).

<b>Budget Categories</b>	[Task 1] Pro. Man.	[Task 2] Com. Inv.	[Task 3] Site Ass.	[Task 4] Reuse Plan.	Total
Travel	\$2,350	-	-	-	\$2,350
Supplies	-	\$300	-	-	\$300
Contractual	\$27,400	\$44,500	\$385,450	\$40,000	\$497,350
<b>Tot. Direct Costs/Budget</b>	<b>\$29,750</b>	<b>\$44,800</b>	<b>\$385,450</b>	<b>\$40,000</b>	<b>\$500,000</b>

Streator officials understand the unique opportunity these funds represent to transform the community; thus, the City will not request budget to offset staff time or indirect administrative costs to maximize its award. **Staff-led activities will be donated in-kind at an estimated value of \$55,473** calculated using a \$100.86 hourly rate for the City Engineer- 400 (\$40,344) and City Administrator- 150 (\$15,129).

f) Plan to Measure and Evaluate Environmental Progress and Results- The City will develop a detailed work plan to track, measure, and evaluate progress in achieving expected project outputs, overall results, and eventual outcomes. This includes associating milestone dates and metrics with specific tasks. The document will serve as a framework for conveying information in QPRs submitted to EPA Region 5. Staff will also conduct monthly phone calls with their EPA Project Officer and contractor to ensure work plan compliance. This approach allows the City to monitor progress towards achieving its goals and devise an appropriate plan to correct unanticipated deficiencies, if identified. Further, the City will maintain ACRES to reflect its accomplishments and report future achievements beyond the grant period to support the EPA Brownfields Program.

4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a-c) Organizational Capacity, Organizational Structure, and Description of Key Staff- The City has the organizational capacity to oversee grant tasks/activities and carry out and manage the



programmatic, administrative, and financial requirements of the grant. Based on conversations with contractors experienced in helping implement Assessment Grants, city staff estimates it will devote about 550 hours, or about 137.5 annually, to its brownfields efforts. This equates to 2.6 hours/week amongst two employees which can be easily supported based on historical workloads.

The City has the processes, procedures, and systems in place to ensure the timely and successful expenditure of funds and completion of all technical, administrative, and financial requirements of the grant. Mr. Jeremy Palm, P.E., City Engineer, will serve as the project's day-to-day contact. His role will include ensuring cooperative agreement compliance, managing grant finances, interfacing with the EPA Project Officer and IL EPA officials, and overseeing the contractor. Mr. David Plyman, City Manager, will support these efforts, as well as lead public outreach activities.

Mr. Palm has 26 years of professional experience and has been with the City since 2006. He manages the Engineering Department that offers project planning, project design, and construction supervision services. He earned a bachelor's degree in civil engineering from the University of Illinois and is a licensed professional engineer. Mr. Plyman has undergraduate and graduate degrees from Northern Illinois University in public relations, city management, and political science and has been with the City for 7 years. He advises City Council and advances their goals and policies; oversees the delivery of public services; and prepares and manages the budget.

d) Acquiring Additional Resources- The City will acquire additional expertise and resources to successfully complete the project. Subject to a competitive selection process consistent with federal procurement guidelines, the City will hire a contractor skilled in grant management, environmental investigation, community outreach, and redevelopment planning activities. The City will issue an RFQ with each response reviewed and scored by a cross-section of staff representing various departments. Their preferred selection will be provided to City Council members for consideration. The proposed project will not involve any subrecipient awards.

#### Past Performance and Accomplishments

##### f) Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Assistance Agreements

1) Purpose and Accomplishments- City staff have requisite experience in managing state and federal funds necessary to administer the proposed project (see recent award bullet points below).

- U.S. EPA (Community Grant) – The City secured \$1.2 million in 2023 to replace aging and obsolete equipment and building roofs at the municipal wastewater treatment plant. All project work is complete, and U.S. EPA has accepted grant closeout documentation.
- U.S. EPA (Community Grant) – The City secured \$400,000 in 2024 to fund storm sewer improvements, roadway repairs, and concrete construction for the LeRoy/Milner Area Sewer Project. All project work is complete with grant closeout documentation submitted.
- IDNR (Open Space Lands Acquisition and Development Grant) – The City secured \$219,900 in 2024 to construct picnic shelters, sidewalks, and bank stabilization measures. The project is complete and grant closeout documents will be submitted by March 2026.

2) Compliance with Grant Requirements- The City has successfully complied with each assistance agreement's respective work plan, schedule, and terms and conditions and completed all reporting, both quarterly and annually, in a timely manner. The City has also achieved all expected results, with no adverse audits or deficiencies noted.

## **THRESHOLD CRITERIA RESPONSES**



## **Threshold Criteria**

### 1. Applicant Eligibility

- a. The City of Streator, IL (City) is an eligible entity for an Assessment Grant as a General-Purpose Unit of Local Government.
- b. Not applicable- the City is a General-Purpose Unit of Local Government.

### 2. Community Involvement

The City understands the importance of engaging residents throughout the project period. The bullet points below summarize the proposed method of informing and actively involving the community and other key stakeholders during the planning, implementation, and other brownfield assessment activities described in the attached application:

- The City will host annual outreach meetings at varying locations near the priority sites within the target area (e.g., school, religious place of worship, etc.) to keep the public informed about project progress and to seek input from interested citizens. The City will hold the events at different times (e.g., afternoon and night) to ensure all individuals have an opportunity to attend. A Spanish interpreter will be available for non-English speaking participants.
- The City will meet with its project partners on an annual basis. Individuals representing the Streator Chamber of Commerce, area real estate agents, and local business community have already committed to assisting with the project's public outreach and reuse planning activities.
- The City will create a project website that explains the EPA Brownfields Program, highlights success stories, summarizes the City's use of leveraged funds, announces cooperative agreement milestone accomplishments, and lists city staff contact information for feedback opportunities such as reuse planning and general questions. Most importantly, the website will include electronic copies of all environmental investigation reports completed during the project period to enhance public transparency.
- The City will generate English and Spanish versions of a brochure that explains the EPA Brownfields Program, offers a brief history of targeted brownfields priority sites, summarizes the environmental investigation process, answers frequently asked questions, and provides contact information for city staff tasked with implementing the grant. Both physical and electronic copies will be available for public consumption.
- The City will issue annual project update press releases to area media outlets including the local newspaper (*The Times*), television stations (ABC, NBC, CBS, and FOX affiliates), and radio stations (WSPL, WSTQ, and WYYS).
- The City will maintain and promote the availability of project files such as quarterly progress reports, annual financial status reports, annual MBE/WBE statements, Final Programmatic Performance Report, Generic Quality Assurance Project Plan

(QAPP), environmental investigation reports, Work Plans, redevelopment planning documents, etc. for public inspection in a repository located at City Hall. This provides citizens with another opportunity to review brownfields documents if they are unable to attend public outreach meetings or lack dedicated internet access.

3. Expenditure of Existing Grant Funds

The City does not have an open EPA Brownfields Assessment Grant or Multipurpose Grant.

4. Subcontractors and Named Subrecipients

Contractor- Not applicable; the City has not selected a contractor that will be compensated with EPA funds made available from this Notice of Funding Opportunity (NOFO).

Named Subrecipients- Not applicable; the City is not naming any subrecipients as part of this proposal.