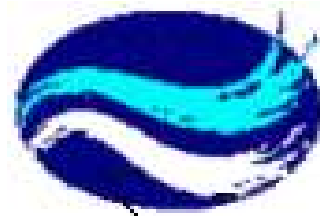


PAUL KAISER, MBA, CPA
Director of Finance



R05-26-C-018

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Winnebago County
Office of the Finance Director
The Wave of the Future

1. Applicant Information Sheet

Applicant Identification

Winnebago County, WI

Unique Entity ID

CLLQHN4SDCS8

Physical Address

112 Otter Avenue
Oshkosh, WI 54901-5008

Mailing Address

PO Box 2808
Oshkosh, WI 54903-2808

Winnebago County, WI will receive the grant and be accountable to EPA for the proper expenditure of funds.

Website URL

<https://www.winnebagoountywi.gov/>

Grant Type

EPA Brownfields Cleanup Grant- Single Site

Federal Funds Requested

Up to \$4,000,000

Brownfield Property Information and Location

American Fibers Site
204 Railroad Street
Menasha, WI 54952
Located in Winnebago County, WI

Project Director Primary Contact

Management Analyst Michael Schuh
Winnebago County Finance Department
(920) 232-3447

maschuh@winnebagocountywi.gov

Mailing Address:

112 Otter Ave, PO Box 2808
Oshkosh, WI 54903-2808

Highest Ranking Elected Official

County Executive Gordon Hintz
Winnebago County Executive's Office
(920) 232-3450

cexec@winnebagocountywi.gov

Mailing Address:

112 Otter Ave, PO Box 2808
Oshkosh, WI, 54903-2808

Population

The American Fibers Site is located in the City of Menasha, Wisconsin, which has a population of 18,433, according to the U.S. Census Bureau.

Other Factors

- The proposed site is adjacent to a body of water (i.e., the border of the proposed site is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them. (Page 4, Narrative)

The American Fibers Site is located within the Menasha Channel corridor. WDNR investigation records confirm that shallow groundwater beneath the Site flows east-northeast toward the Menasha Channel. Although a rail right-of-way separates portions of the parcel from the shoreline, the Site meets EPA's definition of adjacency to a body of water, as the parcel would be contiguous with the Channel but for a public thoroughfare.

WDNR-approved investigation documents further establish that groundwater occurs at shallow depths and that historic site operations resulted in documented contamination in soil and groundwater. The hydrologic connection between the Site and the Menasha Channel underscores the importance of addressing residual contamination under state oversight to protect nearby surface waters and the surrounding community.

Cleanup activities funded through this grant will be implemented in coordination with WDNR and will follow a phased, state-approved approach to ensure that any response actions are protective of human health and the environment, including adjacent surface waters.

Releasing Copies of Applications:

CBI is not applicable

Narrative (SECTION 4C NARRATIVE CRITERIA (SCORING SECTION))
(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

The American Fibers Site is a former industrial property located at 204 Railroad Street in the City of Menasha, Wisconsin, within a historically industrial corridor along the Fox River and Lake Winnebago that supported paper production, warehousing, rail access, and river-based commerce. Properties such as the American Fibers Site were integral to this industrial fabric, supporting regional employment and contributing to the City's economic base during active operation. The Site is located within a developed urban area that includes transportation infrastructure, municipal services, and mixed industrial and commercial uses. Homes, small businesses, and public rights-of-way are situated in close proximity to the Site, and surrounding areas consist of established neighborhoods that rely on municipal water, sewer, and public infrastructure. As a result, environmental conditions at the property affect not only the parcel itself, but also nearby residents, adjacent properties, and public corridors. When operations ceased, the surrounding community was left with underutilized industrial property that continued to shape neighborhood conditions. The closure eliminated long-standing manufacturing jobs, removed a formerly productive parcel from the local tax base, and transformed the Site from an economic asset into an environmental liability that constrains reinvestment and employment within the corridor.

b. Description of the Proposed Brownfield Site(s)

The American Fibers Site, located at 204 Railroad Street in the City of Menasha, Winnebago County, Wisconsin, is a former industrial property with a long history of manufacturing-related use, including fiber processing, warehousing, and associated operations that utilized solvents and other regulated materials. The property is owned by Winnebago County and remains open under Wisconsin Department of Natural Resources (WDNR) Bureau for Remediation and Redevelopment Tracking System (BRRTS) oversight. Environmental investigations conducted over multiple decades and documented in WDNR records have identified contamination affecting soil, groundwater, and vapor intrusion pathways, including volatile organic compounds (VOCs) and metals in environmental media. WDNR-approved investigations confirm that groundwater occurs at shallow depths and flows toward the Menasha Channel, and sampling by WDNR and the U.S. Environmental Protection Agency has identified elevated concentrations of contaminants in both soil and groundwater. Regulatory records conclude that the horizontal and vertical extent of contamination has not been fully defined. Due to the complexity of subsurface conditions—including shallow groundwater, glacial sediments, and proximity to surface waters—the Site remains under active WDNR oversight and is enrolled in Wisconsin's environmental remediation program. WDNR has recommended a phased, state-supervised response approach, reflecting the need for continued regulatory coordination, monitoring, and response actions to ensure protection of human health and the environment. The contamination is of sufficient extent and complexity to require continued regulatory oversight and limits the property's safe reuse without additional cleanup.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

At this stage, Winnebago County has not finalized a specific reuse plan for the Site. Potential future reuse concepts identified through local planning efforts included mixed-use, open space, or

community serving uses, subject to the extent of cleanup achieved and future land use approvals. The County's immediate objective is to address environmental contamination in a manner that protects human health and the environment and restores the property to a condition suitable for future reuse consistent with local land use planning and zoning. This cleanup effort is intended to align with existing community plans and locally adopted land use frameworks, ensuring that future reuse, once determined through standard processes, can reflect established community priorities without being constrained by unresolved environmental conditions.

Reuse planning for the American Fibers Site will occur through the same regulatory frameworks that govern other land use decisions within the City of Menasha and Winnebago County. These include comprehensive planning documents, municipal zoning and land use ordinances, and future policy actions by local governing bodies. Cleanup under this grant is intentionally structured to remove environmental constraints so that these existing planning processes can function without contamination-driven limitations. By separating environmental response actions from land use decision-making, the County ensures that future reuse outcomes remain governed by established municipal and County planning authorities rather than predetermined through the cleanup grant itself.

d. Outcomes and Benefits of Reuse Strategy

Completion of cleanup activities at the American Fibers Site is expected to reduce environmental risk, improve site safety, and remove a significant barrier to future land reuse. Remediation will enhance the Site's suitability for a range of potential future reuses by eliminating contaminant-related health risks, resolving regulatory constraints, and restoring the property to a condition that supports planning, investment and adaptive reuse. Cleanup reduces long-term management needs associated with contamination and removes uncertainty that currently limits the Site's ability to participate in future community and economic development efforts. By removing contamination as the defining constraint, cleanup allows future land use decisions for the Site to occur through the City of Menasha's and Winnebago County's established planning, zoning, and redevelopment processes as applicable, consistent with adopted local plans and standard public review requirements.

Recent WDNR-led groundwater and vapor investigations documented in BRRTS confirm that contamination remains present and requires ongoing state oversight. BRRTS records also document conditions where site-related impacts have been evaluated beyond the parcel boundary (including in off-site and public right-of-way contexts). Cleanup therefore provides a direct public benefit by reducing exposure pathways and addressing conditions that affect the surrounding area while remaining fully aligned with WDNR-approved response actions and standards.

Remediation restores the Site's viability as land capable of supporting productive community purposes within applicable local land use frameworks. For decades, contamination has rendered the property functionally unusable, despite its location in an established industrial corridor and proximity to regional transportation and utility infrastructure that historically supported economic activity. Cleanup removes the sole barrier restoring the Site's ability to participate in the County's planning, zoning, and redevelopment processes and enabling future land use decisions to be made in line with community priorities.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

While the American Fibers Site has been sufficiently characterized to support cleanup under WDNR oversight, limited technical refinement may be required during cleanup design or implementation. Consistent with EPA's FY26 Cleanup Grant guidance, this project does not propose a new assessment phase or general site investigation. Any additional work would be narrowly scoped and occur only as part of cleanup design or implementation to support state-approved response actions, consistent with EPA's Cleanup Grant eligibility requirements. This project does not propose a new assessment phase or general site investigation.

f. Resources Needed for Site Remediation

EPA Brownfields Cleanup Grant funding is being sought to support remediation activities at the American Fibers Site. At this time, no other secured funding sources have been identified to fully complete remediation. The proposed EPA funding would directly support cleanup actions necessary to advance the Site toward closure under WDNR oversight and would serve as the primary catalyst to remove contamination-related barriers, positioning the Site for future public or private investment once remediation is complete.

g. Resources Needed for Site Reuse

At this time, no funding resources have been secured or committed specifically for site reuse activities, such as redevelopment or demolition, at the Site. Decisions regarding future reuse and associated funding will be evaluated following completion of remediation based on County priorities, market conditions, and available public or private funding opportunities. Potential future reuse funding sources may include, as applicable, local capital improvement funds, state redevelopment or economic development programs, federal redevelopment assistance programs, and private investment. Identification and pursuit of such resource is contingent upon successful remediation of the Site and removal of contamination-related barriers. Accordingly, no documentation of secured reuse funding is provided at this stage.

h. Use of Existing Infrastructure

The Site is located within an established urban area with access to existing infrastructure, including roads and utilities. While surrounding infrastructure is currently in use, environmental contamination at the Site limits the property's ability to fully utilize this infrastructure for future development or expanded use. Cleanup of the Site would remove environmental barriers, enabling possible additional safe and appropriate future use of existing infrastructure and reducing constraints associated with contamination.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding

The American Fibers Site represents a long-standing environmental challenge within the City of Menasha and Winnebago County. The County is not the responsible party and does not maintain a fund for cleanup. The Site is subject to WDNR oversight under the State's environmental remediation framework; however, state remediation resources are limited and allocated statewide among numerous priority sites. To date, no local, municipal, or state funding source has been secured that is sufficient to complete remediation at this Site. As a result, the scale, complexity, and

regulatory requirements of cleanup exceed the financial capacity of available local resources. EPA Brownfields Cleanup Grant funding is therefore necessary to advance remediation activities that protect public health and the environment and move the Site toward closure.

b. Health or Welfare of Sensitive Populations

Environmental contamination at the American Fibers Site presents a direct public health concern for nearby residents, workers, and other individuals who may be exposed through soil, groundwater, and vapor intrusion pathways in a mixed residential-industrial area of the City of Menasha. According to the U.S. Census Bureau, 23.0% of Menasha residents are under the age of 18, and 13.8% are age 65 or older. In addition, 12.6% of residents under age 65 report a disability, and 13.7% of the population lives below the poverty level. These demographic characteristics confirm that children, older adults, individuals with disabilities, and economically constrained households are present in the community surrounding the Site and may be disproportionately affected by environmental conditions. These data demonstrate that populations recognized by EPA as potentially sensitive (including children, older adults, individuals with disabilities, and economically constrained households) are present in the community surrounding the Site.

WDNR-led investigations have documented contamination affecting soil, groundwater, and vapor pathways at and beyond the parcel boundary, including off-site and public right-of-way contexts, confirming contamination remains present and subject to ongoing state oversight. These exposure pathways occur near residential areas and sensitive receptors, including nearby residents, workers, children, older adults, and individuals with underlying health conditions identified through U.S. Census and CDC demographic indicators for the surrounding census tracts. While no specific health outcomes are asserted, the presence of these exposure pathways establishes a clear public health rationale for remediation. Cleanup of the Site would reduce potential exposure pathways, improve environmental conditions in the surrounding area, and enhance protection of sensitive populations by addressing conditions that currently require continued regulatory management.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

The proposed cleanup project is intended to reduce potential exposure to hazardous substances associated with historical industrial use of the Site. Environmental investigations have documented the presence of contaminants of concern, including chlorinated volatile organic compounds (CVOCs), within soil, groundwater, and vapor pathways in the vicinity of the Site. Recent vapor intrusion and sanitary sewer gas sampling conducted in public rights-of-way adjacent to residential areas identified compounds such as tetrachloroethene (PCE) and trichloroethene (TCE), which are often associated with adverse health effects under chronic exposure scenarios. Chronic exposure to PCE and TCE has been associated with increased risks of cancer, liver and kidney toxicity, neurological effects, and developmental impacts (e.g., U.S. EPA Integrated Risk Information System; ATSDR Toxicological Profiles).

While site investigations are ongoing, the presence of these exposure pathways near residents and other sensitive receptors indicates the potential for elevated health risks compared to background conditions. Cleanup of the Site would mitigate these exposure pathways, reduce environmental conditions that contribute to adverse health outcomes, and improve community health protections by reducing ongoing exposure to hazardous substances for nearby residents, including children, older adults, and individuals with underlying health conditions.

d. Economically Impoverished or Disproportionately Impacted Populations

Historic industrial land use at the American Fibers Site has resulted in localized environmental conditions that disproportionately affect nearby residents and land uses compared to other areas of the community. The Site is located within a developed urban area with adjacent residential neighborhoods, where contamination in soil, groundwater, and vapor pathways has limited safe reuse and imposed long-term environmental management burdens not experienced elsewhere in the city. These conditions have constrained redevelopment opportunities, reduced land use flexibility, and required ongoing oversight and monitoring, resulting in disproportionate environmental impacts associated with historic industrial operations. Cleanup of the Site could address these legacy conditions, reduce environmental burdens borne by surrounding populations, and support more equitable environmental outcomes by removing contamination-related constraints on future use.

Community Engagement

e. Project Involvement

Winnebago County will implement this project in coordination with the WDNR which maintains regulatory authority over site investigation, remedy selection, and cleanup oversight at the American Fibers Site. WDNR has been actively engaged in site evaluation, groundwater and vapor investigations, and regulatory management of the property, and will continue to serve as the primary state partner throughout the cleanup planning and implementation.

Internally, the project is led by the Winnebago County Finance Department in coordination with the Winnebago County Executive's Office and other internal departments as needed. This collaborative effort will ensure fiscal oversight, grant compliance, and alignment with County policy. Technical cleanup work will be performed by qualified environmental professionals retained by the County and operating under WDNR direction and approval.

The Site is located within the City of Menasha, and County staff coordinate with City officials on regulatory compatibility as needed under existing state and local procedures. Engagement at this stage is structured around regulatory coordination. This approach reflects the project's current phase: implementation of WDNR-approved cleanup actions at a known contaminated site. Broader community or stakeholder engagement regarding future land use will occur, if appropriate, through established local planning and governance processes separate from this Cleanup Grant.

f. Project Roles

Winnebago County will serve as the applicant and lead entity responsible for grant administration and coordination with WDNR in its role providing state regulatory oversight. The County will ensure fiscal oversight, grant compliance, and alignment with County policy. WDNR will maintain regulatory authority over investigation, remedy selection, and cleanup oversight. Technical cleanup work will be performed by qualified environmental professionals retained by the County and operating under WDNR direction and approval. The Site is in the City of Menasha, and County staff will coordinate with City officials if/as needed to ensure regulatory compatibility. No contractors or subrecipients have been selected at this time; procurement will occur in accordance with applicable federal, state, and local requirements following any grant award.

g. Incorporating Community Input

Any public-facing communication related to the Site will occur through existing regulatory and governmental processes applicable to contaminated site cleanup. Winnebago County's community engagement for this project has focused on EPA NOFO requirements including a public notice and public meeting. The EPA Brownfield Cleanup Grant Draft Application and Draft ABCA were presented to the public ahead of time, and the actual Public Notice was the Personnel and Finance Committee Meeting at 9:00 a.m. at the Winnebago County Administration Building, 112 Otter Avenue, Oshkosh, WI 54903 in the Susan T. Ertmer Conference Room (Room 120). This process reflects the current phase of engagement and focuses on transparency.

Engagement activities have included, and will continue to include, public notices, informational updates, and opportunities for community input involving residents, local officials, and state regulatory partners, consistent with EPA Brownfields requirements, state regulatory processes, and current County processes already in place. Community input received will be documented and reviewed as part of cleanup planning and decision-making, consistent with EPA Brownfields Program and WDNR requirements. Opportunities for public input may also occur through established County public processes, such as committee meetings, where applicable. The County will respond to community feedback by incorporating input per any grant agreement requirements and providing follow-up information to explain how comments were considered.

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

a. Proposed Cleanup Plan

The proposed cleanup plan will address contaminated soil, groundwater, and vapor pathways identified at the Site. Consistent with EPA Brownfields Cleanup Grant requirements, the specific cleanup approach, sequencing, and remedial technologies will be selected following grant award based on site specific conditions, evaluation of alternatives, and regulatory requirements with WDNR. The cleanup plan will be consistent with the Draft ABCA and state-approved standards.

Based on existing site investigations and Wisconsin DNR BRRTS recording, cleanup alternatives evaluated in the Draft Analysis of Brownfields Cleanup Alternatives (ABCA) include: 1. No Action; 2. Continued or enhanced monitored natural attenuation with targeted engineering or institutional controls; and 3. Active remedial measures designed to accelerate contaminant reduction, such as targeted soil management or groundwater treatment. Contamination addressed includes impacted soil, groundwater, and vapor intrusion pathways associated with historic industrial use of the Site. Final selection of cleanup methods, sequencing, and disposal requirements will be determined following grant award with additional technical evaluation and coordination with WDNR. All cleanup activities will be designed to be protective of human health and the environment and consistent with state-approved cleanup standards.

b. Project Implementation

EPA Cleanup Grant funds will be used to procure qualified environmental professionals and contractors, in accordance with applicable federal, state, and local procurement requirements, to implement cleanup activities at the Site. Cleanup activities will address contaminated soil,

groundwater, and vapor pathways identified through prior investigations and documented in the Draft Analysis of the Brownfield Cleanup Alternatives (ABCA).

Implementation activities are expected to include final cleanup design, limited cleanup-supporting site characterization as necessary to implement approved remedies, execution of WDNR-approved remedial actions, consistent with EPA Brownfields Cleanup Grant requirements, coordination with WDNR throughout implementation, and documentation of cleanup completion. No contractors or subrecipients have been selected at this time.

Health monitoring activities may be conducted if required by WDNR or the local health agency and, if implemented, would be coordinated in accordance with EPA Brownfields Cleanup Grant requirements. These implementation activities represent a logical and achievable sequence to advance site cleanup while ensuring regulatory compliance and protection of human health and the environment.

c. Anticipated Project Schedule

Cleanup activities are anticipated to occur within the four-year EPA period of performance, subject to WDNR regulatory approvals, procurement timelines, and site conditions encountered during implementation. The project schedule will be refined following grant award and selection of qualified environmental professionals. The anticipated sequencing is:

- **Year 1:** Procurement of qualified environmental professionals; coordination with WDNR; development and refinement of WDNR-approved remedial action work plans; preparation for implementation activities.
- **Year 2:** Initiation of WDNR-approved cleanup actions addressing contaminated soil, groundwater, and vapor pathways, consistent with Draft ABCA and state-approved standards.
- **Year 3:** Continued implementation of remedial actions; performance monitoring as required by WDNR; documentation of progress towards cleanup objectives.
- **Year 4:** Completion of remedial activities; preparation of completion documentation; coordination with WDNR regarding closeout and next regulatory steps, as applicable.

d. Task/Activity Lead

Winnebago County will serve as the lead entity responsible for grant administration, oversight, and coordination with WDNR. Qualified environmental professionals and contractors will be engaged through competitive procurement to perform cleanup activities under County oversight and in compliance with 2 CFR Part 200 and EPA Brownfields requirements for grant requirements and WDNR oversight for clean-up requirements. If required per WDNR, health monitoring activities would be coordinated with the City of Menasha Health Department or WDNR approved department, consistent with existing interagency coordination on the site.

e. Outputs

Anticipated outputs include, but are not limited to:

- Final cleanup plans and supporting documentation
- WDNR-approved remedial action implementation records
- Documentation of cleanup progress and completion
- Updated ABCA documentation, if required
- Administrative and reporting records required under the EPA Brownfields Cleanup Grant

f. Cost Estimates

Cost estimates will be developed based on site-specific cleanup requirements, anticipated remedial approaches consistent with the Draft ABCA, and professional cost estimates developed by qualified environmental professionals. The Draft ABCA is used for planning and grant evaluation purposes only and does not represent a county commitment to a specific remedial action, which will be determined by WDNR approval. EPA grant funds will be used in accordance with applicable program requirements. Final cost allocations will be refined following cleanup design and contractor procurement.

All cost development, unit pricing, and scope refinement will occur only after award and through full and open competition in accordance with 2 CFR 200, and no contractor or consultant has been selected or provided pricing input for this application. All costs will be reviewed for allowability and reasonableness in accordance with EPA Brownfields Cleanup Grant requirements and applicable federal cost principles. Accordingly, the County is intentionally not identifying specific cost categories or line items at the application stage, as doing so would pre-determine scope prior to WDNR approval and required post-award competitive procurement.

g. Plan to Measure and Evaluate Environmental Progress and Results

Project progress will be measured through completion of defined cleanup milestones and associated deliverables. Anticipated outputs include, but are not limited to:

- One finalized, WDNR-approved cleanup plan;
- Implementation and documentation of WDNR-approved remedial actions;
- Documentation demonstrating completion of cleanup activities;
- Updated Analysis of Brownfield Cleanup Alternatives (ABCA) documentation, if required; and
- Administrative and reporting records required under the EPA Brownfields Cleanup Program such as EPA's ACRES system and required quarterly performance reports

Progress will be tracked through EPA-required reporting, contractor deliverables, and WDNR oversight and approvals. Outcomes are expected to include reduced risk to human health and the environment through implementation of approved cleanup actions, improved site conditions consistent with state cleanup standards, and increased readiness of the Site for future reuse consistent with local planning goals. Final outcomes will be evaluated based on compliance with WDNR-approved cleanup standards and completion of required documentation demonstrating risk reduction.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure

Winnebago County has established administrative, financial, and technical systems to manage federal grants and ensure compliance with applicable EPA, state, and federal requirements. The County's Finance Department oversees grant financial management, internal controls, and reporting, while programmatic oversight and coordination with regulatory agencies are conducted in collaboration with appropriate department staff (the main County contact will be the Management Analyst in the Finance Department) and external technical professionals. These systems ensure

separation of duties, compliance with procurement standards, and timely submission of required reports.

b. Description of Key Staff

The grant will be administered through coordinated oversight by Winnebago County's Finance and Administration functions. The Director of Finance and Director of Administration will provide executive and fiscal oversight to support compliance with federal grant requirements, ensure appropriate internal controls, and provide guidance and resources necessary for effective grant administration by the Project Director. A County Management Analyst will serve as the Project Director, responsible for the day-to-day grant coordination, schedule tracking, liaison with regulatory agencies, and coordination with procured environmental professionals. Additional Finance Department staff may provide financial tracking, reimbursement processing, and compliance support as needed. Technical cleanup activities will be performed by qualified environmental professionals and contractors procured in accordance with applicable procurement requirements. The work will be completed under WDNR oversight. County staff involved in grant administration have prior experience managing federal and state grant programs, including financial tracking, compliance monitoring, procurement coordination, and required performance and financial reporting.

c. Acquiring Additional Resources

Winnebago County will acquire additional technical expertise, including qualified environmental professionals and contractors, through competitive procurement in accordance with federal, state, and local procurement requirements. Contractors may be engaged to support cleanup design, implementation, regulatory coordination, and documentation as required by WDNR. The County has established procurement procedures to ensure transparency, cost reasonableness, and compliance with EPA requirements.

Procurement of environmental consultants and contractors will occur after award and following development of WDNR-approved cleanup design parameters and will be conducted in accordance with applicable requirements of 2 CFR Part 200 to ensure open and competitive selection and avoid organizational conflicts of interest.

Past Performance and Accomplishments

e. Has Not Received an EPA Brownfields Grant but Has Received Other Federal or Non-Federal Financial Assistance Agreements

Winnebago County has not previously received an EPA Brownfields grant; however, the County has successfully administered other federally and state-funded financial assistance agreements that are comparable in structure, reporting, and compliance requirements to the proposed EPA Brownfields Cleanup Grant.

(1) Purpose and Accomplishments

American Rescue Plan Act (ARPA) Funding – U.S. Department of the Treasury

Winnebago County received approximately \$33.4 million in federal funding under the American Rescue Plan Act (ARPA) through the U.S. Department of the Treasury. The purpose of this funding was to support COVID-19 response and recovery activities across multiple County departments and eligible program areas. The County successfully administered this assistance agreement through established financial and administrative controls. Required quarterly Project and Expenditure (P&E)

reports were submitted in accordance with U.S. Treasury reporting requirements, and final closeout documentation, including the SF-425 Federal Financial Report, was completed and accepted. All ARPA funds were fully expended within the applicable period of performance, with no remaining unobligated balance at closeout. Outputs under the ARPA agreement included the timely submission of required quarterly P&E reports and completion of all federal financial reporting and closeout requirements. Outcomes included full expenditure of awarded funds within the period of performance, successful closeout of the agreement, and demonstrated compliance with federal financial management and reporting requirements. This experience demonstrates Winnebago County's capacity to administer federally funded projects with rigorous financial controls, compliance monitoring, reporting, and closeout requirements applicable to the proposed EPA Brownfields Cleanup Grant.

Neighborhood Investment Fund (NIF) Grant – State of Wisconsin

Winnebago County received \$10,351,686.15 through the State of Wisconsin's Neighborhood Investment Fund (NIF) program, funded through federal ARPA resources. The purpose of the NIF grant was to support neighborhood revitalization and housing-related improvement activities.

The County participated in ongoing performance and expenditure reporting, coordinated financial review and reconciliation, and supported the preparation of required documentation in collaboration with the County's Housing Grant Specialist and Finance Department. Budget revisions were reviewed, processed, and submitted in coordination with the State to ensure alignment with approved project activities and funding requirements. Outputs under the NIF agreement included required reporting submissions, approved budget revisions, financial reconciliation, and coordination of closeout documentation. Outcomes included continued compliance with State grant requirements, successful administration of a multi-million-dollar assistance agreement, and demonstrated capacity to manage regulated funding involving financial controls, reporting, and interdepartmental coordination.

(2) Compliance with Grant Requirements

For both the ARPA and Neighborhood Investment Fund agreements, Winnebago County complied with approved workplans, schedules, and applicable terms and conditions. The County has a demonstrated history of timely and acceptable reporting, adherence to financial management requirements, and coordination with awarding agencies to ensure compliance. Progress toward achieving expected results was reported within required timeframes. No corrective actions were required due to noncompliance. Where budget modifications or clarifications were necessary, the County coordinated with the awarding agency to ensure documentation and approvals were completed in accordance with program requirements. These agreements demonstrate Winnebago County's ability to successfully manage financial assistance agreements involving reimbursement, reporting, procurement coordination, and closeout capabilities that will be applied to the proposed EPA Brownfields Cleanup Grant.

3. Threshold Criteria

(1) Applicant Eligibility

- a. Winnebago County is an eligible applicant as a general-purpose unit of local government, as defined under Section 104(k) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The County has the legal authority to apply for and, if awarded, accept federal grant funding and to carry out cleanup activities at property it owns.

a. **Document of Applicant Eligibility (if other than a City, County State, or Tribe)**

Not Applicable- applicant is a County Government

b. **A Statement of the Applicant's 501(c)(4) Tax Exempt Status and , if Applicable, Legal Opinion Regarding Lobbying Activities**

Not Applicable-

Winnebago County is a general-purpose unit of local government and a Political subdivision of the State of Wisconsin. As such, it is not a 501(c) tax-exempt entity, and no legal opinion regarding lobbying activities is applicable (the County does not participate in lobbying activities). Because Winnebago County is a county government, documentation applicable to non-governmental entities is not required.

(2) Previously Awarded Cleanup Grants

Affirmation Statement: The American Fibers Site has not previously received an EPA Brownfields Cleanup Grant per communication with EPA Region 5.

Furthermore, based on available internal records and confirmation from EPA Region 5, Winnebago County, Wisconsin, has not previously received EPA Brownfields Cleanup Grant funding.

(3) Expenditure of Existing Multipurpose Grant Funds

The applicant has no open EPA Brownfields Multipurpose Grant. Accordingly, the expenditure and drawdown requirements described in the NOFO do not apply to this application.

(4) Site Ownership

Winnebago County is the current owner of the Site. The County acquired the property by tax deed through involuntary acquisition as a result of tax delinquency, on March 20, 1997, and maintains full ownership and site control. There are no access restrictions that would prevent implementation of cleanup activities.

(5) Basic Site Information

The full Site name is the American Quality Fibers Site located at 204 Railroad Street, Menasha, WI 54952.

(6) Status and History of Contamination at the Site

a. Whether the Site is Contaminated by Hazardous Substances or Petroleum

The American Quality Fibers Site is contaminated by hazardous substances. Environmental investigations documented in WDNR records and consultant-prepared reports have identified contamination affecting soil, groundwater, and the vapor intrusion pathway at the Site.

b. The Operational History and Current Use(s) of the Site

The Site historically supported industrial manufacturing operations associated with fiber and textile production. These operations involved the use of industrial chemicals and solvents typical of the period. The Site is currently vacant as a result of foreclosure and the presence of environmental contamination, and there are no active industrial or commercial operations occurring on the property.

c. Environmental Concerns, if Known, at the Site

Known environmental concerns at the Site include presence of hazardous substances in soil and groundwater and the potential for vapor intrusion. These conditions complicate redevelopment, expansion, and reuse of the property and present barriers to safe occupancy and productive use.

d. How the Site Became Contaminated and, to the Extent Possible, the Nature and Extent of the Contamination

The Site became contaminated because of historical industrial activities that released hazardous substances, including chlorinated solvents, to the environment. These releases resulted in impacts to multiple environmental media. The nature of the contamination includes subsurface solid and groundwater impacts, with associated vapor intrusion concerns. The extent of contamination has been documented through environmental investigations and tracked in the WDNR Bureau for Remediation and Redevelopment Tracking System (BRRTS) under Activity Number 02-71-208585 and CERCLA ID WISFN0507806.

(7) Brownfield Site Definition

The American Quality Fibers Site meets the definition of a “brownfield site” under Section 101(39) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

The Site is tracked in the Wisconsin Department of Natural Resources' Bureau for Remediation and Redevelopment Tracking System (BRRTS) under Activity Number 02-71-208585 and has been assigned CERCLA ID WISFN0507806. The presence of hazardous substances at the Site complicates expansion, redevelopment, or reuse of the property.

The Site is:

- a) not listed or proposed for listing on the National Priorities List (NPL);
- b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c) not subject to the jurisdiction, custody, or control of the United States government.

Accordingly, the Site is eligible for EPA Brownfields Cleanup Grant funding under CERCLA §§ 101(39) and 104(k).

(8) Environmental Assessment Required for Cleanup Grant Applications

Environmental assessment activities completed at the Site include a Phase I Environmental Site Assessment prepared by Winnebago County in January 1998; a Wisconsin DNR Bureau for Remediation and Redevelopment Tracking System (BRRTS) assessment completed in January 1999; and multiple Site Investigation Reports and state-led investigations documenting soil, groundwater, and vapor intrusion conditions.

Subsequent investigations have included subsurface soil and groundwater sampling (2003–present) and indoor air and sub-slab vapor investigations conducted in 2024 and 2025.

These assessments collectively provide a level of characterization equivalent to a Phase II environmental site assessment for purposes of cleanup planning.

The most recent Phase II–equivalent investigation activities occurred in April–June 2025, including indoor air, sub-slab vapor, groundwater, and sanitary sewer vapor sampling.

(9) Site Characterization

(10) Enforcement or Other Actions

There are no known, ongoing, or anticipated environmental enforcement actions, administrative orders, consent decrees, or other regulatory actions in place at the Site related to contamination or cleanup activities.

(11) Sites Requiring a Property-Specific Determination

Winnebago County is not a responsible party for contamination at the Site. Contamination occurred prior to County ownership, and the Site is tracked by Wisconsin DNR as a Local Government Unit (LGU) site with an applicable liability exemption.

The County qualifies for liability protections available to local governments under CERCLA and has not caused or contributed to the release of hazardous substances at the Site. Cleanup activities would be conducted in coordination with, and under the oversight of, the Wisconsin DNR.

The American Fibers Site does not fall within any of the special classes of property identified in the FY26 EPA Brownfields Cleanup Grant NOFO that require a Property-Specific Determination. The site is regulated under Wisconsin's standard environmental remediation framework and is tracked in BRRTS under Wisconsin DNR oversight. Based on available records and the Wisconsin DNR acknowledgement letter submitted with this application, the Site is not subject to a federal removal action, consent decree, or other regulatory status that would trigger a Property-Specific Determination. Therefore, a Property-Specific Determination is not required.

(12) Threshold Criteria Related to CERCLA/Petroleum Liability

The American Fibers Site is contaminated with hazardous substances. Petroleum contamination is not the predominant contaminant driving response actions at the Site.

Winnebago County is not a potentially responsible party under CERCLA §107. Contamination at the Site occurred prior to County ownership, and the County did not cause or contribute to the release or threatened release of hazardous substances at the Site.

Winnebago County is a Local Government Unit (LGU) that acquired the property after contamination had occurred and qualifies for liability protections available to governmental entities under CERCLA and the BUILD Act. The County has not engaged in any activity that would constitute ownership or operation contributing to contamination, nor has it arranged for the disposal or treatment of hazardous substances at the Site.

All investigation and cleanup activities will be conducted in coordination with, and under the oversight of, the Wisconsin Department of Natural Resources.

Accordingly, Winnebago County is exempt from CERCLA §107 liability for the contamination at the Site and is eligible for EPA Brownfields Cleanup Grant funding.

Threshold Criteria Related to CERCLA Liability

a. Property Ownership Eligibility – Hazardous Substance Site

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

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

(CERCLA §104(k)(3)(E))

The American Fibers Site is contaminated with hazardous substances. Petroleum is not the predominant contaminant driving response actions at the Site. Winnebago County qualifies for the statutory exception for publicly owned brownfield sites acquired prior to January 11, 2002, pursuant to CERCLA §104(k)(3)(E).

(a) Describe in detail the circumstances under which the property was acquired.

Winnebago County acquired the American Fibers Site through an involuntary governmental process following tax delinquency and abandonment by the former private owner. The acquisition was not a voluntary market transaction; it occurred pursuant to the County's statutory duties as a local unit of government to take title to tax-delinquent property. The County did not operate the facility prior to acquisition and did not engage in any industrial activity at the Site. The historic industrial uses that caused contamination occurred under prior private ownership.

(b) Provide the date on which the property was acquired.

Winnebago County acquired the property by tax deed on March 20, 1997.

(c) Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.

All disposal and release of hazardous substances at the Site occurred prior to Winnebago County's acquisition. The contamination is associated with historic industrial operations that ceased before County ownership. No disposal of hazardous substances has occurred at the Site since the County acquired title.

(d) Affirm that you have not caused or contributed to any release of hazardous substances at the site.

Winnebago County affirms that it has not caused or contributed to any release or threatened release of hazardous substances at the Site.

(e) Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

Winnebago County affirms that it has not, at any time, arranged for the disposal of hazardous substances at the Site and has not transported hazardous substances to the Site.

(13) Cleanup Authority and Oversight Structure

a. Adequate Oversight of Cleanup Activities

The American Fibers Site is regulated under Wisconsin's environmental remediation framework and is tracked in the WDNR Bureau for Remediation and Redevelopment Tracking System (BRRTS). WDNR oversight governs site investigation, remedy selection, and cleanup implementation.

Environmental assessment and response activities completed to date under WDNR oversight include Phase I and Phase II Environmental Site Assessments, subsurface soil and groundwater investigations, and vapor intrusion evaluation. Furthermore, the County created a Draft Analysis of Brownfields Cleanup Alternatives (ABCA) for this grant application process.

Winnebago County does not plan to enroll the Site in a separate State or Tribal voluntary response program. WDNR regulatory oversight through BRRTS provides the legally binding authority, technical review, and approval structure necessary to ensure that all cleanup activities are protective of human health and the environment and consistent with applicable federal and state requirements.

Cleanup activities funded through this grant will be conducted in coordination with WDNR and in accordance with approved work plans, state remediation standards, and WDNR-approved remedy decisions. Technical oversight will be provided through qualified environmental professionals retained by the County and subject to WDNR review and concurrence at each stage of cleanup implementation.

This structure ensures that cleanup activities are independently reviewed by the State regulatory authority and carried out under enforceable environmental standards, providing adequate oversight throughout the cleanup process.

b. Access to Adjacent or Neighboring Properties

If cleanup response activities require access to adjacent or neighboring properties (e.g., for confirmation sampling, monitoring, or off-site migration evaluation), Winnebago County will obtain access through voluntary cooperation with property owners and, where necessary, through written access agreements or easements.

The County noted that WDNR has letters in BRRTS requesting access for off-site investigations, when necessary and if further access is needed, the County will collaborate with WDNR to ensure these are carried out in alignment with their regulatory framework.

(14) Community Notification

In accordance with EPA Brownfields Cleanup Grant requirements, Winnebago County has provided public notice and an opportunity for community comment prior to submission of this application.

- No public comments related to the EPA Brownfields Cleanup Grant application or Draft ABCA were received during the public comment period.

- Per EPA Brownfields Cleanup Grant NOFO requirements (FY26 Guidelines, pages 20–22), the required community notification materials are included as attachments at the end of this application.

a. Draft Analysis of Brownfields Cleanup Alternatives

- A draft Brownfields Cleanup Grant application and Draft Analysis of Brownfields Cleanup Alternatives (ABCA) were made publicly available in advance of the public meeting. The materials were posted for public review beginning December 29, 2025.

b. Community Notification Ad

- Public notice was provided in accordance with EPA requirements on December 29, 2025 via CivicClerk (our County's standard public facing portal containing information and documents for all public meetings) and included the required statements regarding availability of the draft application and ABCA, how to submit comments, and the date, time, and location of the public meeting.

c. Public Meeting

- A public meeting was held on January 8, 2026, at 9:00 a.m. during the Personnel and Finance Committee meeting in the Susan T. Ertmer Conference Room 120, Winnebago County Administrative Building, 112 Otter Avenue, Oshkosh, Wisconsin. Members of the public were provided an opportunity to review the draft application and ABCA and to submit comments in-person or through Microsoft Teams.

d. Submission of Community Notification Documents

Attached to this application are:

- A copy of the Draft Analysis of Brownfields Cleanup Alternatives (ABCA);
- A copy of the notification on CivicClerk covering the notification ad requirements (that a copy of the grant application and draft ABCA is available, how to comment on the draft application, where the draft application is located, and the date, time and location of the public meeting) as well as soliciting public comments on the proposal
- A copy of the language for offering accommodations including for those with Limited English Proficiency (LEP) and individuals with disabilities
- Meeting notes or a summary of the public meeting.
- A summary of public comments received (if any) and the County's responses; and
- A meeting sign-in sheet or participant list.

(15) Contractors and Named Subrecipients

Not applicable- At the time of application, no contractor or subrecipient is selected for cleanup activities. Procurement will occur following award, in accordance with applicable federal, state, and local procurement requirements.



January 16, 2026

Michael Schuh
Management Analyst
Winnebago County Finance Department
112 Otter Avenue, Fourth Floor
P.O. Box 2808
Oshkosh, WI 54903-2808
Via Email Mail Only to MASchuh@winnebago.wi.gov

Subject: State Acknowledgement Letter for Winnebago County
FY26 EPA Brownfield Cleanup Grant

Dear Mr. Schuh,

The Wisconsin Department of Natural Resources (DNR) acknowledges the application of Winnebago County (the County) for the U.S. Environmental Protection Agency (EPA) brownfield grant identified above.

The DNR is fully committed to a collaborative partnership with the County and is able to support your brownfield assessment and remediation efforts in many ways, including:

- The DNR can identify key state and federal contacts for your specific project and coordinate Green Team meetings with individuals in your community to answer questions and discuss local plans, options and best practices.
- The DNR can assist you in identifying and obtaining additional financial assistance from state-managed grant and loan programs.

Obtaining U.S. EPA funding for this grant application is consistent with community needs, is vital to the local economy and will help bring needed improvements to the quality of life for residents. Federal funding will also help initiate cleanup activities, create jobs and leverage local investments in brownfield redevelopment.

FY26 Cleanup Grant: Site(s) Eligibility, Characterization, and Readiness for Remediation

For FY26, EPA requests that certain applicants for cleanup grants submit a letter from the state describing property eligibility and whether there is a sufficient level of site characterization from the environmental site assessment for the remediation work to begin on the property(ies).

- **Eligibility.** This property is undergoing cleanup under Wisconsin's cleanup program and its governing administrative code, Wis. Admin. Code chs. NR 700-799, and statute, Wis. Stat. ch. 292. The state cleanup program is regulatory and nonvoluntary. This property is eligible for the Voluntary Party Liability Exemption (VPLE) program under Wis. Stat. § 292.15; the County has not enrolled this project in the VPLE program.
- **Site assessment and characterization status.** Site characterization is sufficient to allow remediation work to begin on the site. For the property described in the attached request, dated December 19, 2025, the applicant stated the following:

Based on environmental site assessments performed to date and information provided by the applicant, the site has undergone extensive Phase II-equivalent investigation, including:

- *Indoor air and sub-slab vapor investigations (April 2025)*
- *Groundwater sampling (May–June 2025)*

These investigations provide a sufficient level of site characterization for remediation planning to proceed, subject to DNR review and approval.

The DNR notes that, in addition to recent site characterization activities, the sustained efforts and combined resources of the County and the DNR over time have brought his site to its current status.

Based on the information provided by the applicant, the DNR believes site characterization is complete to an extent that allows remediation work to begin at this site.

Sincerely,



Roxanne N. Chronert, Policy and Program Operations Director
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

Attachment:

Request dated December 19, 2025

cc:

Keld Lauridsen, DNR NER – Keld.Lauridsen@wisconsin.gov

Tauren Beggs, DNR NER – Tauren.Beggs@wisconsin.gov

Denise Danelski, DNR NER – Denise.Danelski@wisconsin.gov