



Lynda Ludwig, President

R05-24-C-015

RE: Narrative Information Sheet – FY2024 USEPA Brownfields Cleanup Grant Application, Former Lionite Mill Property, 115 Depot Road, Phillips, Wisconsin

Price County United Limited (PCUL) is pleased to submit this application for United States Environmental Protection Agency (USEPA) Fiscal Year (FY) 2024 Brownfields Cleanup Grant funding. Information requested in the grant guidelines is provided below.

1. Applicant ID: Price County United Limited, N9751 Bass Lake Road, Phillips, Wisconsin 54555

2. Federal Funds Requested

a. Grant Type: Single Site Cleanup

b. Federal Funds Requested: \$1,677,894

3. Location: City of Phillips, Price County, State of Wisconsin

4. Property Information: Former Lionite Mill Property, 115 Depot Road, Phillips, Wisconsin 54555

5. Project Contacts

Role	Project Director and Chief Executive
Name	Dr. Lynda Ludwig
Title	President
Phone #	[REDACTED]
Email Address	[REDACTED]
Mailing Address	[REDACTED]

6. Population: City of Phillips (Census Tract 55099970500): 1,569 people.

7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	Narrative (page 1)
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Narrative (pages 3-4) and Narrative Attachment A
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Narrative (pages 1, 2)
The proposed site(s) is in a federally designated flood plain.	Narrative (page 2); ABCA – Appendix B



Other Factors	Page #
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures	Narrative (page2)
The proposed project will improve local climate adaption/mitigation capacity and resilience to protect residents and community investments.	Narrative (page 2)
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

N/A = not applicable

8. Releasing Copies of Applications: The leveraged commitment presented as Narrative Attachment A is confidential business information.

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a. Target Area & Brownfields/1.a.i. Overview of Brownfield Challenges & Description of Target Area:

The City of Phillips (population 1,569) was founded in 1879 in the center of vast forests that originally covered northern Wisconsin, and still do today. The Target Area is the downtown of the City of Phillips, the county seat of Price County, Wisconsin (Census Tract ([CT] Number: 55099970500). Phillips is isolated from urban areas as the nearest cities with at least 5,000 residents (Rhineland and Merrill) lie nearly 70 miles away, and the nearest cities with over 100,000 residents (Duluth and Green Bay) are over a 3-hour drive away. The City is situated on the north-south running Highway 13 and bordered by Elk and Duroy Lakes, part of the Phillips Chain of Lakes.

The Ojibwe people had an established trading empire in Northern Wisconsin along the waterways when American settlers started arriving in the 1800s. Through treaty after treaty the Ojibwe were forced to cede their land until by 1854, the people were restricted to living on the Bad River, Red Cliff, Lac du Flambeau, and Lac Courte Oreilles Reservations. From the newly depopulated forests the almost perfect rectangle of Price County was carved out in the same year that Phillips was founded – 1879 and named for a logger and President of the Wisconsin Senate W. T. Price. The County seat, the City of Phillips, was built at the nexus of forest, rail, and water which allowed for the efficient processing of lumber. Due to this efficiency the white pine forests were logged out in 25 years and then logging shifted to the hardwood forests. The Phillips location proved so suitable that it continued to mill and then to manufacture wood products such as plywood, at the site for >100 years.

Main industries in Price County today include logging, manufacturing, and tourism. Many people visit Phillips to enjoy outdoor recreational activities. However, the City has suffered serious economic declines in recent years. There are numerous vacant or partially occupied buildings in the City's downtown, many of which are in disrepair. Along the main commercial corridor there are three former gas stations, a former Ford Dealership, and numerous small buildings. The slow decline in the City's population (which peaked in 1920) limit the types/numbers of commercial businesses that can profitably operate in the downtown, adding to the challenge of redevelopment. The City's largest brownfield challenge is the property that is the focus for this grant application – the former Phillips Lionite hardboard manufacturing facility, which closed in 2015, partially collapsed in 2023, but which, together with earlier lumber manufacturing facilities, has occupied a one-half mile section of the City's downtown waterfront for over 140 years, physically separating the downtown from the waterfront.

The Target Area for the Grant is Downtown Phillips. This area stretches from the southern City limits along Highway 13 to the northern city limits. This area was selected based on stakeholder interest and the economic potential of this highly visible transportation corridor. Price County United Limited (PCUL) is the applicant for this grant.

1.a.ii. Description of the Proposed Brownfield Site(s): The Phillips Lionite Mill property occupies 26.2 acres and consists of two parcels – a 25.5-acre parcel where the former mill buildings are located, and a 0.7-acre vacant parcel to the south. The property is located along the western shore of Duroy Lake and is bordered to the north by County Highway H (aka Depot Street), and to the southwest by an active railroad corridor operated by Fox Valley and Lake Superior Railroad. The main commercial corridor (and the historic downtown business blocks) lies on the western side of the railroad corridor.

Use of the property as a sawmill dates back to 1883. These mills operated for 50 years and included sawmills, planing mills, wood fiber mills, dry kilns, box factories, tramways, machine shops, refuse burners, engine houses, ash houses, oil houses, offices, a mill pond, and sawdust and lumber storage. By midcentury, the facility shifted from milling to the production of wood products. Various owners operated the facility between 1958 and 2015 to produce wood paneling for interior walls. The former mill includes 41 distinct buildings or building areas with a combined floor area of 173,378 square feet. The current production facility includes a boiler house, saw building, warehouses, mill buildings, the hardboard production area, maintenance shop, a print plant, and miscellaneous storage buildings. Other equipment includes truck scales, debarkers, chip silos, conveyor belts, dust collectors, silos, maintenance shops, dryers, cyclones, humidifiers, and a paint room.

The "Site" for this application is limited to the 9.2-acres occupied by the current plant buildings. Environmental records for document the historic presence of 16 aboveground storage tanks (ASTs) and 7 underground storage tanks (USTs) to store fuel oil, diesel fuel, leaded gasoline, and xylenes. The USTs appear to have been closed/removed although two fuel oil USTs (15,000 and 28,000-gallon) were abandoned in place. Several of the USTs had documented releases which were assessed, remediated and closed by the Wisconsin Department of Natural Resources (WDNR) in 1999 and 2002. Six spills were reported at the property, but these were also all closed by WDNR by 2000. According to the Flood Insurance Rate Map 550345, the property is partially located in Zone C (areas of minimal flooding) and is partially located in Zone A.

The primary environmental concerns associated with the property are asbestos containing materials (ACMs) and restricted wastes that are present within the current facility buildings and documented through a pre-demolition assessment completed in October 2023. The survey documented extensive ACMs throughout the buildings. Extensive materials requiring abatement or management were identified as a result of this inspection and form the basis for the proposed environmental cleanup activities to be funded from the EPA grant, if awarded.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy & Alignment with Revitalization Plans: The (2013) *City of Phillips Comprehensive Plan (Comprehensive*

Plan) accepts the environmental liabilities/challenges at the former Phillips Lionite Mill property while acknowledging the need to increase residential and recreational redevelopment in the City. The proposed reuse will address the need for healthy housing while reconnecting the community to the Lake and providing expanded recreational opportunities for the community. Project partners were involved in design charettes related to the reuse plan.

Increased Housing Development. Construction of the former Phillips Lionite Mill along Lake Duroy effectively segregated the City from the Lake. Conceptual reuse plans include mixed use multi-family residential and commercial uses supplemented by significant public greenspace to reconnect the link between the City and regional waterways. The residential developments envisioned for the Property will consist of (4) 16-unit apartments aligned around a public park; (14) 4-unit village homes along a lakefront trail, and (12) small homes adjacent to public small craft docks along the Lake.

Shoreline and Wetland Restoration. Shoreline and inland wetland restoration will be completed during redevelopment to restore ecological function decimated by prior industrial activities. As called out in the *Comprehensive Plan*, restoration/preservation of wetlands is directly related to groundwater and surface water quality. The redevelopment will include public green seam corridors reconnecting the downtown street grid to the Lakefront trail network. Increased recreational opportunities will further address community priorities identified in the *Price County Community Health Needs Assessment Survey (2019-2022)*. The eastern edge of the Site is located in a federally designated flood plain; therefore, shoreline/wetland restoration activities will mitigate flood risk to the community.

Expanded Recreational Options. This summer, PCUL began working with an urban planning firm on developing possible redevelopment concept plans. The plans include publicly accessible outdoor recreational amenities such as a universal playground, trails, boat launches, and public parking. An accessible playground will provide recreational facilities to relatively high numbers of City residents that are afflicted with a broad range of disabilities (as detailed on **Table 3** in Section 2.a.ii). The nearest accessible or universal playground is a 2-hour drive to Stevens Point. In addition, one plan includes the incorporation of a recreational facility, perhaps with a climbing gym. The temperature in Phillips is regularly below freezing from November to March. This recreational space would give residents access to recreation year-round which could potentially improve health outcomes. The *Comprehensive Plan* calls for an increase in expanded recreational activities to increase the health of the community, in response to a community survey in which 88% of the participants said that "*Recreation/Cultural Opportunities needs a little/lot of improvement.*" This community need and priority will be significantly addressed through the reuse plans.

1.b.ii. Outcomes & Benefits of Reuse Strategy: The EPA Grant will transform the footprint of the derelict and decaying former mill into a safe, lakeshore greenspace that is accessible to city residents and visitors alike. The redevelopment concepts that have been created include a 3,000-foot extension of a planned City trail system along the lakefront, one or more boat launches for public use as well as a swath of greenspace encircling the lake. In accordance with EPA guidelines for climate adaptation the Site would likely include stormwater management measures, and landscaping that would help to mitigate stormwater runoff. As part of this urban redevelopment energy **efficient lighting** (i.e., solar-powered LED lights) will be installed along the redeveloped lakefront. The benefits of deindustrializing the Site include recreational opportunities such as an accessible/universal playground and ecological benefits. Additionally, the element of affordable housing for residents, a small commercial development (such as a lakefront restaurant) would stimulate the downtown economy.

Currently the site is depressing land value and impeding economic opportunity for tourism and recreation on Duroy Lake. Instead of being a blighted and contaminated area it will become a community asset like the adjacent Elk Lake Park. The largest private investment component of the project will be constructing the residential structures. Reuse plans include construction of (132) dwelling units. Assuming an average unit size of 1,200 square feet and a construction cost of between \$175 and \$215 per square foot, the reuse will leverage between **\$28,000,000** and **\$34,000,000** in private investment. **Non-Profit Investment.** Non-profit investment will focus on constructing shared amenities, including the accessible playground, indoor recreational facility, climbing walls, and event center (estimated cost between **\$5,000,000** and **\$7,000,000**). Non-profit investments will include shoreline/wetland restoration (estimated **\$500,000**); greenspace enhancements (estimated **\$300,000**); and construction of boat docks (estimated **\$100,000**); and installation of a 3,000-linear foot bi-modal trail (estimated cost **\$194,000**).

1.c. Strategy for Leveraging Resources: We have been working for nearly 2 years to identify resources to assist with assessment, remediation, and subsequent reuse of the Phillips Lionite site, as well as four other brownfields sites located in downtown Phillips. These efforts have included the attendance by our executive director, Lynda Ludwig, at the last two EPA National Brownfields Training conferences where discussions were held with consultants, EPA staff, staff from other federal agencies, private developers, and staff from Kansas State University (KSU) and other technical service providers. Multiple meetings have also been held with staff from the Wisconsin Economic Development Corporation (WEDC), the City, the County, the Northwest Wisconsin Regional Planning Commission (NWRPC), the Park Falls Area Community Development Corporation (PFACDC), and the WDNR regarding funding and technical assistance that may be available for Phillips Lionite Mill property and other sites. Finally, PCUL has expended over \$25,000 on consultants within the past one-year period for assistance in identifying resources that can be leveraged for these properties.

1.c.i. Resources Needed for Site Characterization: Potential sources of funding or technical assistance for further assessing the property include: 1) EPA Region 5 Targeted Brownfields Assessments (TBAs), 2) Wisconsin Department of Natural Resources - Wisconsin Assessment Monies (WDNR WAM) which utilizes assessment grant funding secured by WDNR from EPA, 3) Wisconsin Economic Development Corporation (WEDC) Site Assessment Grants (SAG), and 4) EPA Community-Wide Assessment (CWA) and Site-Specific Assessment Grants. The EPA Brownfield CWA grants would be an ideal resource to fund potential future assessment activities at the Site as well as other brownfield sites located in the Target Area. However, as a relatively new not-for-profit organization, with limited grant experience, we would be unable to put together a competitive application for this funding. We have approached three other entities on our region that could be competitive for EPA Assessment Grants and able to use funding on our site and other in Phillips – the NWRPC, the PFACDC, and the Lake Flambeau Band of Lake Superior Chippewa Indians. We have offered to collaborate with these organizations, including sharing the cost of retaining a grant-writing consultant that could assist with one or more applications. We will also utilize our own funding as needed to pay for assessment activities, as was the case with the pre-demolition assessment that needed to be completed on the site for this application.

1.c.ii. Resources Needed for Site Remediation: The EPA Cleanup Grant, if secured, will be sufficient to complete what is overwhelmingly the most important initial step in cleaning up the Property, abating hazardous materials present within the buildings, safely removing and disposing of the large quantities of universal wastes identified within the buildings, and removing the buildings that have already collapsed or are in danger of collapsing. We anticipate that the grant will be sufficient to leave the portions of the property with the current plant complex, in a cleared condition, with any impacted soil either removed or covered with an initial cap. Although there are no current data documenting significant impacts in other areas of the property, there is evidence of significant thickness of sawdust and other fill in certain areas of the property. Removal of these materials could be required in the future for geotechnical reasons as well as potential contamination concerns. Therefore, we have purposely defined the “site” for this application as the 9.2-acres of the property occupied by the current plant buildings, to leave open the possibility of applying for a second EPA cleanup grant for the remaining 17-acres of the property once those areas are further assessed, redevelopment plans further defined, and potential cleanup costs known. PCUL is committing to providing 500 to 1,000 cubic yards (CY) of topsoil for use in constructed the engineered cap once the buildings are demolished (see Attachment A to the Narrative Information Sheet [NIS]).

1.c.iii. Resources Needed for Site Reuse: Securing the grant and demolishing the building will be of tremendous importance in helping to position PCUL to successfully pursue other funding. Many investors/donors have difficulty seeing the potential of the site and seeing past (both figuratively and literally) the massive, blighted, and partially collapsed buildings obstructing the view of Lake Duroy. We have approached several developers and local foundations regarding investing in future projects on the property and secured a commitment on one confidential private investor to develop up to a 20,000-ft² customer support and/or network monitoring center, that would employ up to 50 people (only 3 fewer than were employed at the Mill when it closed) and include a \$1-4 M investment in the building. Other commitments include a commitment from The Hive (a local adventure sports sales and rental business owned by our executive director) to supply six bike racks, one bike repair station, and a paddleboard rack for use in the future lakefront trail and waterfront areas with a combined value of \$8,000. Meadows of the North, an affiliated organization that works with the Phillips School District on student engagement, has committed to securing in-kind work from students in performing planning, design, and physical labor for future improvements at the Property once cleanup is completed. These in-kind services are estimated to include 1600 hours of work by students (valued at \$15/hour) and 80 hours of work by adult instructors (valued at \$25/hour). We are planning to pursue a \$250,000 WEDC Community Development Investment Grant, which can be used for infrastructure and new construction, a WDNR Knowles-Nelson Stewardship Grant which can provide funding for the waterfront trail and other waterfront improvements, a Wisconsin DOT Transportation Alternative Program Grant for trail construction, and a number of USDA grant programs that appear to be applicable to project components.

A “natural capital assessment” was completed for the property and identified the potential to secure up to \$70,000 per acre for any portions of the property that are restored to serve as a wetland. We believe this would be feasible for up to five acres of the property in areas bordering Lake Duroy. This funding could then be used to support development of other portions of the property. As detailed in Section 1.b.i, reuse for the site envisions commercial and residential development on portions of the property. This not only recognizes the need for this type of development in the community, but is also critical to the overall funding strategy, as use of the site solely for non-profit purposes would make it ineligible for use of tax incremental financing (TIF) to pay for required infrastructure within the site, as well as a potential source of funding for additional cleanup. TIF is overwhelmingly the most important source of funding in Wisconsin that supports redevelopment of brownfield sites¹. The public components of the project will also potentially become eligible for use of TIF funding if they are part of a larger development project that complements the private development areas.

1.c.iv. Use of Existing Infrastructure: The Site is located on an active railroad line, with a dedicated spur serving the property.

¹ <https://dnr.wisconsin.gov/sites/default/files/topic/Brownfields/bsq/uuwreport.pdf> TIF funding accounted for 42% of public investment in 703 sites, versus 34.2% for all State programs, 12.5% for EPA and other federal brownfields funding, and 11.0% for other local funding.

Furthermore, Highway 13 is only a block or so from the subject property and serves as a good transportation route through portions of northern Wisconsin. The site is serviced by high voltage electric lines, as well as municipal water, sewer, and natural gas. Due to the high loads for these utilities associated with the operation of a major industrial facility, they should be sufficient to serve any future envisioned residential, commercial, community, and recreational uses. New roads, sidewalks, and utility service lines will be required within the interior of the property to support the envisioned redevelopment plans. As detailed in Section 1.c.iii, it is anticipated that these can be paid for through use of TIF. By developing the site in phases, starting at the northern portion of the property next to Highway H, it will be possible to construct the infrastructure in phases as development extends to the south through the property, enhancing the economic feasibility of gaining support for use of TIF.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT

2.a. Community Need: Table 1. Economic Distress Data (American Community Survey [ACS] 2021 5-Year Estimates²)

Income & Poverty	Phillips	Price County	State of WI	United States
Median household income ^A	\$40,982	\$52,052	\$67,080	\$69,021
Per capita income ^A	\$21,887	\$30,997	\$36,754	\$37,638
Unemployment rate ^B	5.3%	2.5%	3.5%	5.5%
Households w/ food stamp/SNAP benefits ^C	21.2%	12.5%	10.2%	11.4%
Poverty rate for all people	22.0%	13.2%	10.7%	12.6%
Poverty rate for under 18	33.7%	20.9%	13.5%	16.3%

A) In 2021 inflation adjusted dollars. B) Civilian population in labor force ≥16 years. C) Past 12 months. SNAP = Supplemental Nutrition Assistance Program.

2.a.i. The Community’s Need for Funding: The City of Phillips has a population of only 1,569 residents, and as detailed on **Table 1**, is a community in which poverty rates are approximately double those for the State and the US, and where the median and per capita incomes are about 40% lower than those for the State and the US. As such, EPA Cleanup Grant funding if awarded will be used to benefit a community that is both very small and low income, factors that contribute significantly to the challenges of trying to cleanup a massive brownfield site with significant liabilities. As a not-for-profit organization, PCUL is also entirely reliant on donations, grants, and time donated by volunteers to implement its projects, and therefore has a greater need for grant funding than many other types of applicants.

The closure of the Phillips Lionite facility in 2015 was also a significant financial blow to the community. At the time of its closure, the mill employed 53 local residents and had a combined payroll of ~ \$3.5 M in compensation and benefits to its employees annually. It was also one of the largest payers of user fees to the City-owned wastewater treatment facility.

2.a.ii. Threats to Sensitive Populations/ 2.a.ii(1) Health or Welfare of Sensitive Populations:

Our community suffers greatly from the health and welfare threats that exist here. Drawing on the Climate and Economic Justice Screening (CEJST) Phillips, WI (Tract Number: 55099970500) is a disadvantaged community due to heart disease, low life expectancy, and low income. A significant number of our residents can be classified as members of sensitive populations. As shown in **Table 2** below, our residents are skewed both younger 25.9% and older 23.8% than the population of Wisconsin and the Nation.

Table 2. Sensitive Populations in the Target Area (ACS 2021 5-Year Estimates)

Sensitive Populations	Phillips	Price Co.	State of WI	US
Children under 18 years (% of total population)	25.9%	18.2%	22%	22.5%
Woman 15-44 years (% of total population)	31.5%	26%	37.5%	20%
65 and over (% of total population)	23.8%	26.1%	17%	16%

The Centers for Disease Control and Prevention (CDCP) have detailed estimates for the percentages of residents with seven different types of disabilities. Data for the Target Area CT are summarized on **Table 3** below, together with data for the US as a whole, and the percentile in comparisons to all Wisconsin CTs. A disproportionate number of residents suffer from a hearing, mobility, or vision disability.

Table 3. Disabled Residents in the Target Area CT³

Disability Category ¹	Prevalence in Target Area CT ²	Average Prevalence in the US	Percentile Among All WI CTs ³	Disability Category ¹	Prevalence in Target Area CT ²	Average Prevalence in the US	Percentile Among All WI CTs ³
Any Disability ⁴	30.4%	28.3%	88.2%	Mobility Disability ⁴	16.3%	13.5%	93.2%
Cognitive Disability ⁴	12.8%	12.4%	69.8%	Self-Care Disability ⁴	4.8%	3.9%	86.2%

² Notes for Table 1. Data downloaded on 10/18/2023. All data are 5-year estimates for 2017-21.

³ Notes for Table 3. A) Data accessed from the CDC website on 10/28/2023. B) The target area CT is 55099970500. C) Estimated crude prevalence.

Hearing Disability ⁴	9.6%	6.9%	99.0%	Vision Disability ⁴	5.5%	5.0%	83.0%
Independent Living Disability ⁴	8.8%	7.4%	83.2%				

Notes: 1) All data are for 2020-21. 2) Census Tract (CT) 55099970500. 3) Percentiles are based on the average prevalence rates for the Target Area CT versus those for all 1,392 CTs in Wisconsin. A percentile value of 88.2 means that the average prevalence in the Target Area is higher (worse) than that in 88.2% of all Wisconsin CTs. 4) Rates are for adults ≥ 18 years.

Part of the site reuse envisions the construction of a community accessible and inclusive playground. The playground design will integrate play experiences for adults and children with physical, cognitive, and/or developmental disabilities into fun, social interactions between adults and children with and without disabilities. As shown on **Table 3**, our Target Area has a much higher prevalence of disabled individuals than most of Wisconsin. The playground will have soft surfaces to allow children with mobility challenges to move around the playground easily, wheelchair accessible ramps will allow users to reach all of the park’s features and reach panels will provide tactile stimulation for users with cognitive disabilities. The playground will also provide physical opportunities to our residents with heart disease. All onsite signs will incorporate braille and sign language displays. The playground will provide a safe recreational area to our residents as well as Wisconsin residents that are located in areas that do not have accessible playgrounds.

2.a.ii(2) Greater Than Normal Incidence of Disease & Adverse Health Conditions: Price County has the **5th highest rate of cancer of the 72 counties in Wisconsin (National Cancer Institute)⁷**. The Wisconsin Environmental Public Health Tracker (WEPHT) indicates that **Price County has an age-adjusted rate (per 100,000 population) of 13.1 for nervous system cancers** (compared to the state average of 6.9); **cancer of the larynx is 6.2%** (compared to the state average of 3); **lung cancer is 59.1** (compared to the state average of 57.1); **pancreatic cancer is 18.5** (compared to the state average of 14). This is a very high rate of cancers for our sparsely populated county.

Data for 12 chronic disease and health indicators for the Target Area, based on estimates developed by the Centers for Disease Control and Prevention (CDCP)⁴ are provided in **Table 3** below. Prevalence rates for the Target Area are compared to those for the US as a whole. In addition, the table shows the percentile ranking for the Target Area CT relative to all 1,392 CTs in Wisconsin. A percentile value of 97.6 means that the average prevalence in the Target Area is higher (worse) than that in 97.6% of all Wisconsin CTs.

Table 4. Health Measure Estimates for Target Area Census Tract (CT)⁵

Health Measure ¹	Prevalence in Target Area CT ²	Average Prevalence in the US	Percentile Among All WI CTs ³	Health Measure ¹	Prevalence in Target Area CT ²	Average Prevalence in the US	Percentile Among All WI CTs ³
Asthma ⁴	10.6%	9.7%	61.0	Diagnosed Diabetes ⁴	11.7%	11.3%	88.7
Arthritis ⁴	35.1%	25.2%	97.6	High Blood Pressure ⁴	37.4%	32.7%	90.1
Cancer (excluding skin) ⁴	9.4%	7.0%	95.2	High Cholesterol ⁴	40.0%	36.4%	94.1
Kidney Disease ⁴	4.0%	3.1%	95.8	Obesity ⁴	35.0%	33.0%	45.3
COPD ^{4,5}	8.6%	6.4%	95.0	Stroke ⁴	4.3%	3.3%	94.0
Heart Disease ⁴	8.5%	6.1%	97.9	All Teeth Lost ⁶	15.4%	13.4%	78.7

Notes: 1) All data are for 2020-21. 2) Census Tract (CT) 55099970500. 3) Percentiles are based on the average prevalence rates for the Target Area CT versus those for all 1,392 CTs in Wisconsin. A percentile value of 97.6 means that the average prevalence in the Target Area is higher (worse) than that in 97.6% of all Wisconsin CTs. 4) Rates are for adults ≥ 18 years. 5) COPD = Chronic obstructive pulmonary disease. 6) Rates are for adults ≥ 65 years.

The Target Area has higher prevalence rates for every health outcome measure than the US as a whole, and scores exceptionally poorly on eight health outcome measures where the Target Area ranks between the 90.1 and 97.9th percentile among all CTs in Wisconsin. Exposure to airborne ACMs and other regulated building materials influence COPD, asthma and cancer rates. Underground chemical releases influence cancers, kidney disease rates. **The extremely poor health for residents in the Target Area is likely responsible for an overall low life expectancy, which based on the CEJST tool ranks in the 97th percentile.**

2.a.ii(3) Environmental Justice:/ 2.a.ii(3)(a) Identification of Environmental Justice Issues: The Site and property are located in CT55099970500, which is classified as disadvantaged by the CEJST tool primarily as a consequence of the relative high poverty rates, and very poor rankings for several health measures considered by the tool including heart disease (90th percentile) and low life expectancy (97th percentile). As detailed in Section 2.a.ii(2), the CT scores extremely poorly not only on these health measures but on nearly every major health outcome measure. Based on review of data for the City on the EPA EJScreen Tool, the supplemental indices document the City as being at the 59th percentile relative to Wisconsin as a whole for traffic proximity, the 73rd percentile for exposure to lead based paint, the 66th percentile for hazardous waste proximity, the 71st percentile for USTs, and the 80th percentile for wastewater discharge. The former Lionite Mill property, with its buildings that have partially collapsed, and which are documented to contain large quantities of ACMs and other restricted waste, is arguably one of the most significant environmental justice (EJ) concerns on the City. Only limited

⁴ <https://chronicdata.cdc.gov/500-Cities/500-Cities-Census-Tract-level-Data-GIS-Friendly-Fo/k86t-wqhb/data>

⁵ Notes for Table 3. A) Data accessed from the CDC website on 10/28/2023. B) The target area CT is 55099970500. C) Estimated crude prevalence.

environmental assessment activities have been performed areas underlying the existing buildings (which lie closest to the downtown) and areas adjacent to Lake Duroy. Therefore, the potential impacts of the Site on critical local water resources used for recreation, fishing, and by the Lake Flambeau Band of Lake Superior Indians for harvesting of wild rice and other resources under treaty rights, is largely unknown.

2.a.ii(3)(b) Advancing Environmental Justice: Displacement Avoidance: The project is located on a large vacant parcel and will not displace any existing residents or businesses. We are working with the current owner to find an alternative building in the Price County area where they can relocate equipment from the plant and utilize for a new wood products business. We will provide flexibility to the previous owner in removing their equipment to maximize the possibility retaining this type of business in our area. The Site is located in a disadvantaged CT according to the CEJST tool, with this status being attributable to the relatively high poverty rates in the City and CT55099970500, in combination with poor ratings on two measures (life expectancy and heart disease).

Informing and Engaging Residents in Decision Making: As a not-for-profit organization whose mission is to support community and economic development through community engagement, we are committed to guiding the redevelopment and reuse of the property and Site in a manner that will effectively engage and inform the community as a whole, and utilize their input into the Site reuse.

Addressing and Reducing Threats: The EPA Cleanup Grant will initially help reduce the threats to human health and safety by removing ACMs and restricted wastes from the buildings. Demolition of the buildings will enable contaminated soil beneath the buildings to be safety assessed and hotspot areas of contamination subsequently removed and landfilled. An engineered cap of clean soil and/or crushed concrete will be constructed as needed in select areas of residual contamination to leave the Site in a safe condition where any residual contamination in soil is not exposed to potential direct contact nor to possible erosion and discharge to Lake Duroy. These completed activities will greatly accelerate transformation of the Site from a 140-year source of pollution and blight, to quality healthy affordable housing, commercial uses that will help more residents achieve economic stability, and trails and recreational uses that will provide greater for physical activity that will help reduce rates for chronic health conditions.

2.b. Community Engagement/ 2.b.i/ii. Project Involvement/Project Roles: Information on five project partners is provided on the table below. If funding is awarded, we will form a Brownfields Advisory Committee (BAC) to facilitate involvement by these partners in making decisions with respect to cleanup and future reuse of the Site.

<p>Phillips Area Chamber of Commerce (PACC) and Price County Tourism (PCT). (Laura Palzkill, Executive Director, 715-339-4100, chamber@phillipswisconsin.net). The PACC will engage with the business community and provide detailed surveys about reuse and redevelopment of the property. The PCT will coordinate the marketing and tourism of the property helping to see how it fits into the region from an arts and cultural perspective.</p>
<p>Price County Area Trail Hub (PATH) (Ron Kendziera, 715-820-1567) and Price Area Trail Hub, Inc. (PATHI) (Christy Speer, info@priceareatrailhub.org). PATH and PATHI will assist with planning and funding for the 3,000-foot section of trail along the east edge of the property that will be one of the key recreational amenities to be created.</p>
<p>Lac du Flambeau Tribe (LDFT) (Kristen Hansen, Brownfields Coordinator, 715-588-3303, khanson@ldftribe.com). focs@pctcnet.net). The LDFT will provide input on restoration of the lakefront areas, as well as serve as potential partner/applicant for an EPA FY2025 Assessment Grant.</p>
<p>Park Falls Area Community Development Corporation (PFACDC) (Shannon Greenwood, 715-744-4700, pfacdc@pctcnet.net). The PFACDC will assist with communicating with stakeholders about business funding and will potentially pursue and EPA FY2025 Brownfields Assessment Grant that could be used on the site.</p>
<p>North Central Technical College (NCTC) (Diana Kilinski, kilinskid@ntc.edu). The Phillips campus offers over 120 program options ranging from associate degrees to technical diplomas and certificates. We are in discussions with NCTC about the possibility of having them provide training courses for asbestos workers and HAZWOPER to facilitate work by local residents. They will also aid in training for the planned customer support and/or network monitoring center on the site.</p>

2.b.iii. Incorporating Community Input: The plan to communicate project progress within our community will have the following goals: 1) Encourage public understanding and contribution to the decision-making process during cleanup, and the community’s role in that process; 2) give the public accessible, accurate, timely, and understandable information about the cleanup project as it moves forward; 3) ensure adequate time and opportunity for the community and community groups to provide informed and meaningful participation and for that input to be considered; 4) reflect community concerns, questions, and information needs; and 5) request and include public input in the redevelopment planning process. The process for communicating and engaging with the community will be spearheaded by the BAC.

3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS

3.a. Proposed Cleanup Plan: Cleanup activities at the “Site” will be focused on a 9.2-acre area within the northcentral portion of the property where the current buildings and structures are located. Cleanup will address three contaminated media: 1) ACM present throughout the buildings, as well as within select materials and equipment inside of the buildings, 2) at least

40 types of restricted waste materials documented within the buildings, and 3) contaminated soil hotspots underlying the floor slabs in some areas of the buildings. ACM and restricted waste materials will be managed and disposed of in accordance with federal/state requirements. Removal of these materials is necessary for building demolition which is necessary as ACMs are integral with the roof and other structural building components. Removal of floor slabs will also be necessary to access soil hotspots for removal and landfilling. Based on the predominant use of steel for construction of the buildings, and the lack of LBP on any of the cement surfaces, it is anticipated that metal not incorporated with ACMs will be recycled and that concrete will be crushed and stockpiled for cap construction or as geotechnical fill materials to be used during redevelopment. Based on environmental testing, it is anticipated that the primary contaminants in soil will be PAHs, petroleum VOCs, lead and select other metals. There are no data to suggest that any of the soils will be hazardous, and it is assumed that all contaminated soil that is excavated can be landfilled as a non-hazardous solid waste at a licensed sanitary landfill. Before the concrete floor slabs are removed, remedial sampling will be conducted through the slabs to further delineate the soil removal areas. Portions of the slab may be left in place if either there are no impacts present in those locations, or if contamination is so extensive that it cannot be fully removed until other funding is secured. This will provide flexibility in the final cleanup approach, while staying within the project budget, maximizing the amount of contaminated soil removed, completing the cleanup to avoid leaving areas of exposed soil with contaminant concentrations that exceed levels safe for direct contact, while complying with EPA rules regarding use of cleanup grant funds for demolition activities.

3.b.i/ii/iii/iv. Project Implementation, Schedule, Task/Activity Leads, and Outputs: No subawards, subgrants, or participant support costs are anticipated. The project scope has been organized into five tasks as detailed below. It is anticipated that the project will be completed within the first two years of the project period, and schedules below are based on this assumption.

Task 1 – Outreach, Grant Management, and Reporting
<p>i. Activities: Outreach activities will include: 1) public meetings, 2) BAC meetings, 3) providing updates on the PCUL website, 4) preparation of fact sheets and mailers, and 5) other outreach activities as detailed in Section 2.b.iii. Grant management activities will include: 1) biweekly calls with the EPA Project Officer, and 2) procurement of a QEP firm through a qualifications-based procurement (QBP) process compliant with procurement standards in 2 CFR Part 200, 2 CFR Part 500, and 40 CFR Part 33. Reporting activities will include: 1) quarterly progress reporting, 2) annual disadvantaged business enterprise (DBE) reporting, 3) Property Profile Form submission and updates in the Assessment, Cleanup and Redevelopment Exchange System (ACRES), and 4) preparation of a final project report. Other activities: PCUL staff will also attend two national brownfields training conferences. The QEP will prepare an updated ABCA.</p>
<p>ii. Schedule: PCUL is in the process of updating its policies and procedures in order to be fully prepared for the pre-award compliance review and to be in a position to complete procurement of the QEP by the anticipated project start date of 10/1/2024. Community outreach is on-going and will accelerate once the EPA grant project officially begins and be on-going throughout the project. Progress reports will be submitted on or before January 30th, April 30th, July 30th, October 30th of each year. Annual DBE reports will be submitted on or before October 30th. Updates will be entered into ACRES following execution of the cooperative agreement, and upon completion of milestones related to remediation, WDNR approvals, and as redevelopment milestones are achieved or leveraged funding secured.</p>
<p>iii. Leads: PCUL staff (Lynda Ludwig, with support from Cheryl Moore and Blake Pluemmer) will lead this task, with support from the QEP on reporting and outreach activities.</p>
<p>iv. Outputs: 1) Outreach meetings (3 to 4 total) with notices, agendas, presentations, sign-in sheets, and meeting notes. 2) BAC meetings (up to 8 over 2 years) and associated materials. 3) Outreach materials (fact sheets; results summary sheets; website updates with all materials prepared in both Spanish and English). 4) Quarterly progress reports, annual DBE reports, final closeout report, ACRES updates. 5) Procurement documentation for the QEP. 6) Updated ABCA.</p>
Task 2 – Hazardous Materials Removal
<p>i. Activities: 1) PCUL staff (with support from the QEP) will complete EPA required threatened or Endangered Species Act (ESA §7(a)(2)) and National Historic Preservation Act (NHPA §106) review activities, as appropriate for both the abatement work and subsequent demolition and soil remediation activities. 2) The QEP will prepare bid specifications for the hazardous materials removal activities and assist PCUL in retaining one or more contractors to perform and oversee this work, following the applicable procurement standards in 2 CFR Part 200, 2 CFR Part 500, and 40 CFR Part 33. 3) A contractor will remove restricted wastes present throughout buildings on the Site and remove and dispose of these materials in accordance with federal and state requirements. 4) An abatement contractor will remove ACM throughout the buildings including the roofs and electrical panels, and appropriately dispose of these materials. 5) The removal of ACM and restricted wastes will be overseen and documented by a certified asbestos inspector, who will prepare report documenting this work when complete.</p>
<p>ii. Schedule: PCUL will seek approval from EPA to begin work on the ESA/NHPA reviews as a pre-award activity, to help minimize delays to the overall project schedule. It is anticipated that the QEP will be under contract by 10/1/2024 and will assist initially in helping PCUL to retain an oversight contractor for the abatement work by 12/1/2024. Bidding for the abatement and restricted waste removal contractors will be completed by 1/1/2025. We anticipate having the abatement and restricted waste removal activities completed by 5/1/2025, and the documentation report by 6/1/2025. All equipment in the building that was owned by the previous owner is required to be removed by 6/1/2024.</p>

iii. Leads: PCUL staff (Lynda Ludwig) will lead this task, with support from the QEP.
 iv. Outputs: 1) ESA/NHPA Screening Documentation. 2) Procurement documentation for the abatement oversight contractor, the asbestos abatement firm, and the restricted waste management firm (assumed to be three separate firms). 3) Full abatement, removal, and appropriate disposal of ACMs throughout the buildings. 4) Full removal and appropriate management, disposal, and recycling of restricted wastes throughout the buildings. 5) Documentation report (including documentation of appropriate disposal or recycling of all ACM and restricted wastes removed). 6) WDNR Permits and approvals. 7) Davis-Bacon Act documentation.

Task 3 – Demolition

i. Activities: 1) The QEP will prepare bid specifications for the demolition activities and assist PCUL in a demolition contractor, following the applicable procurement standards in 2 CFR Part 200, 2 CFR Part 500, and 40 CFR Part 33. 2) All buildings at the Site will be demolished down to the floor slabs. 3) The fuel oil USTs (15,000- and 28,000-gallon) that were abandoned in place will be removed to enable assessment in these areas. 4) The floor slabs will be removed in select areas where necessary to access underlying contaminated soil for removal. 5) The removed floor slabs and other concrete or cement materials generated during demolition work will be crushed on-site and stockpiled for future use. 6) The demolition activities will be overseen and documented by a certified asbestos inspector, who will also prepare a documentation report for demolition once complete.

ii. Schedule: Bidding and contracting for the demolition work will be completed during 1/1/2025 to 4/1/2025. Work will begin as soon as abatement activities are completed (anticipated to be by 5/1/2025). The initial phase of demolition is anticipated to take 14 weeks, and to be completed by 8/10/2025. Removal of the floor slabs and crushing on-site will occur after the completion of Task 4 below but is anticipated to be completed by 9/15/2025.

iii. Leads: PCUL staff (Lynda Ludwig) will lead this task, with support from the QEP.

iv. Outputs: 1) Procurement documentation for the demolition contractor. 2) Full demolition of all above grade buildings and structures, with landfilling of some materials but recycling of all metal and cementitious materials which are expected to represent 80-90% or more of the building construction materials. 3) Removal and appropriate decommissioning of the two USTs. 4) Removal of up to 35,000 ft² of floor slabs from areas where soil is to be removed. 5) Documentation report. 6) Permits and approvals. 7) Davis-Bacon Act documentation.

Task 4 – Remedial Design Sampling

i. Activities: 1) The QEP will prepare a combined Sampling and Analysis Plan (SAP) and Quality Assurance Project Plan (QAPP) in accordance with EPA requirements, which will be submitted for review and approval to EPA. 2) Sampling will be conducted to identify and delineate areas beneath the floor slabs where impacts are suspected to be present. 3) A report will be completed summarizing the findings and detailing areas that should be prioritized for removal as part of the grant.

ii. Schedule: Preparation of the SAP/QAPP will begin as demolition work is underway, with a goal of getting approvals in place by the time above grade demolition work is completed (i.e., by 8/10/2025). Field work and sampling will require 2 weeks, lab analyses an additional 2 weeks, and data evaluation and reporting 3-4 weeks.

iii. Leads: The QEP will lead this task.

iv. Outputs: 1) SAP/QAPP. 2) Remedial Design Report.

Task 5 – Soil Remediation/Capping

i. Activities: Task 5 activities will include: 1) preparation of bid documents and bidding, 2) excavation and landfilling of contaminated soil hotspots containing up to 3,200 tons of soil, 3) grading /backfilling of the excavation areas, 4) placement of top soil and seeding of select areas.

ii. Schedule: Bidding will be completed in November 2025 through January 2026. Excavation work likely be scheduled for late Spring (i.e., May 2026). The excavation work will likely take 3-4 weeks to complete and will be coordinated slab removal and concrete crushing included under Task 3. The final remedial documentation report will be completed in early summer 2026.

iii. Leads: The QEP will lead this task.

iv. Outputs: 1) Removal and disposal of an estimated 3,200 tons of impacted soil, 2) capping and seeding of excavation area, 3) bid specifications, 4) procurement documentation, 5) final remedial documentation report.

3.c. Cost Estimates: PCUL is requesting \$1,677,894 in funding as detailed below.

Line #	Budget Categories	Task 1	Task 2	Task 3	Task 4	Task 5	Totals
		Outreach, Grant Mgmt., & Reporting	Hazardous Materials Removal	Demolition	Remedial Design Sampling	Soil Remediation/Capping	
1	Personnel & Fringe	\$63,600	\$0	\$0	\$0	\$0	\$63,600
2	Travel	\$3,600	\$0	\$0	\$0	\$0	\$3,600
5	Contractual	\$33,000	\$82,500	\$39,700	\$74,750	\$38,500	\$268,450
6	Construction	\$0	\$452,850	\$607,500	\$0	\$198,000	\$1,258,350
8	Total Direct Costs	\$100,200	\$535,350	\$647,200	\$74,750	\$236,500	\$1,594,000
9	Indirect Costs	\$5,274	\$28,176	\$34,063	\$3,934	\$12,447	\$83,894
10	Total Federal Funding	\$105,474	\$563,526	\$681,263	\$78,684	\$248,947	\$1,677,894

Note: 1) No equipment, supplies, or other costs are requested. 2) All construction costs assume payment of prevailing wages under the Davis-Bacon Act. 3) All contractual and construction costs are estimated, and actual costs will be subject to bids and proposals received.

Development and Application of Cost Estimates:

<p>Task 1 – Outreach, Grant Management, and Reporting: Total Budget = \$105,474</p> <p>Personnel and fringe costs of \$63,600 are budgeted for grant management, coordination, outreach, and reporting activities to be performed by PCUL staff. It is assumed these activities will require an average of 12 hours per week over the anticipated approximate two years required to complete the project, at an average combined salary + fringe cost of \$53/hour (12 hrs/week X 50 work weeks/year X 2 years = 1,200 hours). Travel costs of \$3,600 are included for the PCUL project manager to attend two national brownfields training conferences, with estimated costs of \$600 per conference for airfare, \$800 per conference for hotel rooms, and \$400 per conference for registration fees and incidentals. Contractual costs of \$33,000 are budgeted and include: 1) <u>\$5,000</u> for a qualified environmental professional (QEP) to prepare an update to the ABCA, 2) <u>\$14,000</u> for the QEP to provide assistance with required grant reporting activities (estimated at 80 hours at \$175/hour), and 3) <u>\$14,000</u> for the QEP to provide assistance with community engagement activities (also estimated at 80 hours at \$175/hour). Indirect costs of \$5,274 are included equal to 5% of the total task budget.</p>
<p>Task 2 – Hazardous Materials Removal: Total Budget = \$563,526</p> <p>Contractual costs of \$82,500 are budgeted and include: 1) <u>\$7,500</u> for a consultant to prepare bid documents and assist with bidding for ACM abatement and restricted waste removal management activities, 2) <u>\$70,000</u> for a consultant to oversee abatement and restricted waste removal activities (based an estimated 16 weeks to complete hazardous materials removal, an assumption that the consultant would be on-site four days per week and up to 10 hours per day, an a daily cost of \$1,250 provided by a potential consultant for this work), and 3) <u>\$5,000</u> for a consultant to complete an abatement documentation report. Estimated construction costs of \$452,850 include: 1) <u>\$118,500</u> for abatement of ACMs in roofing materials, 2) <u>\$45,000</u> for abatement of ACMs in electrical panels, 3) <u>\$199,350</u> for abatement of other identified ACMs within the building or equipment, and 4) <u>\$90,000</u> for removal, management, and disposal/recycling of restricted wastes. Construction costs assume payment of prevailing wages under the Davis-Bacon Act. Indirect costs of \$28,176 are included equal to 5% of the task budget.</p>
<p>Task 3 – Demolition: Total Budget = \$681,263</p> <p>Contractual costs of \$39,700 are budgeted and include: 1) <u>\$7,500</u> for a consultant to prepare bid documents and assist with bidding for demolition activities, 2) <u>\$27,200</u> for a consultant to oversee demolition activities (based an estimated 14 weeks to completion demolition activities, an assumption that the consultant would be on-site two days per week and up to 5 hours per day, and a cost estimate by a consultant of \$850/day), and 3) <u>\$5,000</u> for a consultant to complete a demolition documentation report. Estimated construction costs of \$607,500 include: 1) <u>\$480,000</u> for demolition of above grade structures, 2) <u>\$52,500</u> for partial removal of floor slabs as necessary to access and remove underlying contaminated soil (estimated at 35,000 ft² and a unit cost of \$1.5/ft²), 3) <u>\$50,000</u> for removal and 15,000 and 28,000-gallon fuel oil USTs that were abandoned in place and filled with inert materials in 1988 and 1994, and 4) <u>\$25,000</u> for crushing and on-site stockpiling of an estimated 5,000 CY concrete and cement block walls, and floor slabs to be removed during demolition. Construction costs assume payment of prevailing wages under the Davis-Bacon Act. Indirect costs of \$34,063 are included.</p>
<p>Task 4 – Remedial Design Sampling: Total Budget = \$78,684</p> <p>Contractual costs of \$74,750 are included for a QEP to perform remedial design sampling throughout the floor slab areas once the building is removed, and include: 1) <u>\$7,500</u> for preparation of a SAP/QAPP, 2) <u>\$20,000</u> for an estimated 8 days of work by a GeoProbe subcontractor (at \$2,500/day), 3) <u>\$16,000</u> for 100 hours of field oversight and sampling by the QEP (@ \$160/hour), 4) <u>\$18,750</u> for lab analyses of an estimated 50 soil and 15 groundwater samples for VOCs, and 150 soil and 15 groundwater samples for PAHs, 5) <u>\$2,500</u> for equipment, vehicle, and expenses for the QEP at \$250/day, and 6) <u>\$10,000</u> for preparation of a report by the QEP. Indirect costs of \$3,934 are included equal to 5% of the total task budget.</p>
<p>Task 5 – Soil Remediation/Capping: Total Budget = \$248,947</p> <p>Contractual costs of \$38,500 are budgeted and include: 1) <u>\$5,000</u> for a QEP to prepare bid documents and assist with bidding for soil remediation activities, 2) <u>\$18,500</u> for a QEP to oversee soil remediation activities (assumed to require 10 days of oversight at an average cost of \$1,850/day), and 3) <u>\$15,000</u> for a QEP to complete a remedial documentation report. Estimated construction costs of \$198,000 include: 1) <u>\$160,000</u> for excavation, loading, trucking, and landfilling of up to 3,200 tons of contaminated soil at an estimated unit cost of \$50/ton, and 2) <u>\$38,000</u> for limited grading and subsequent seeding of areas disturbed during demolition and remediation activities. Construction costs assume payment of prevailing wages under the Davis-Bacon Act. Indirect costs of \$12,447 are included equal to 5% of the total task budget.</p>

3.d. Plan to Measure and Evaluate Environmental Progress and Results: We will closely track and monitor progress on Site cleanup through the grant period. Upon notification of grant award, tasks, milestones and reporting requirements will be integrated into a master project schedule. **Short-term cleanup outputs and outcomes** for the project will be tracked and documented and include: 1) the technical documents that are completed for the project (including the CIP, SAP/QAPP, procurement and bidding documentation, remedial documentation report, Davis Bacon Wage compliance documentation, and WDNR permits and approvals), 2) the quantity and types of ACM and restricted wastes removed and disposed or recycled, 3) the volume/weight of building materials landfilled, recycled, or crushed and stockpiled for on-site reuse, 4) the mass of contaminated waste/soil/fill removed and landfilled, 5) the estimated mass of contaminants removed, and 6) the area of land made safe for reuse through soil removal, engineering cap construction, and other remedial measures.

Funding: As we continue to gather input from the community and refine our reuse plans, we also be working to develop a “resource roadmap” that will define our strategy and desired timeline for various grant and funding programs that will be needed to accomplish the long-term desired project outcomes. As funding is secured and utilized, it will be documented in ACRES. **Longer-term redevelopment outcomes** will also be tracked and measured and will include: 1) the acres of land developed for parks, greenspace or other public use, 2) the acres of land restored for enhanced ecological use, 3) the feet of trails or public walkways created, 4) the number of affordable and other housing units created, 5) the square footage of commercial space created and associated number of jobs and annual wages, 6) the amount of public and private funding leveraged, and various sources from which it was obtained, and 7) the use of the various community amenities by area residents or visitors.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE

4.a. Programmatic Capability/4.a.i/ii. Organizational Structure and Description of Key Staff: PCUL is a grass roots community organization established in 2023, but a leadership team with strong business backgrounds and experience managing complex technical and construction projects. One of our volunteers is an environmental consultant for over 30 years prior to retirement, based in Price County and has a deep knowledge the hydrogeologic conditions in Price County as well the contamination and other environmental issues associated with former lumber manufacturing businesses which predominated in this region. We have the capacity to manage this project as it will be a primary focus for our organization over the next several years.

Project Director: Lynda Ludwig will serve as project director. She has created, run, and managed two veterinarian practices, was the general construction project manager for one of the two veterinarian hospitals that she designed and built in the last 15 years. She has other business and community associations, such as Connect Communities/Main Street America lead for Phillips and helped establish others for local communities. She has connections with the technical college, private Northland College in Ashland, WI, and personal startups with multiple partner agencies and organizations to deliver economic/business development. Her experience has included running local, national, and international businesses, and collaboration with local organizations and work force.

Project Controller: Ms. Cheryl Moore will be responsible for fiscal management of the grant. She has 35 years of experience in public finance including 30 years as an accounts payable supervisor and interactional accountant. She has been the secretary/treasurer for the Kennan/Catawba joint sewage commission for 20 years, the president of the Village of Catawba for 20+ years and has spearheaded and managed grant and community development projects in the area of sewer infrastructure projects in Kennan and Catawba, WI using USDA and CDBG funding.

Technical Coordinator: Blake Pluemer will serve as Technical Coordinator. Blake Pluemer is an engineer, and currently works as VP of sales and previously as VP of operations for a major corrugated international business. He has 38 years in the packaging industry. The team will participate in monthly project meetings and offer ongoing input in decision making.

4.a.iii. Acquiring Additional Resources: As a grass roots organization, we rely significantly on expert consultants to provide the technical and legal expertise needed to successfully implement revitalization projects. In order to be in a position to apply for this grant, PCUL retained consultants to perform initial reuse planning, advise on acquisition of the property, perform environmental due diligence, conduct the pre-demolition testing, and to assist with preparation of the grant application and supporting documentation including the ABCA. We are experienced in hiring the types of consultants, contractors, and other professionals needed for this type of project and are in the process of updating our policy and procedures manual to comply with the additional federal and EPA requirements that will be applicable for any purchases or contracts funded by the grant, and to be fully compliant with 2 CFR Part 200, 2 CFR Part 500, and 40 CFR Part 33. We will comply fully with the Six Good Faith efforts in our procurement practices and included WBE and MBE firms in those we contacted for assistance in developing cost estimates for the project. We will keep the community informed regarding the project and the opportunities will generate related initially to abatement and demolition activities, followed by opportunities in construction and site redevelopment, and finally in businesses that will be located in the commercial portion of the project. We have been proactive in working with the immediate past owner, who will be removing the manufacturing equipment remaining in the building and relocating this equipment to a facility in Price County that is better suited for his business, which will provide a significant number of well-paying local jobs. We will work with NCTC to provide training programs that could enhance the ability of local residents to perform work related to abatement, remediation, and demolition.

4.b. Past Performance & Accomplishments

4.b.iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements

PCUL is a newly formed nonprofit and has not received prior grant funding.

Application by Price County United Limited for an FY2024 USEPA Brownfield Cleanup Grant for the Former Lionite Mill Property, Phillips, Wisconsin

THRESHOLD CRITERIA FOR BROWNFIELD CLEANUP GRANTS

1. Applicant Eligibility

Price County United Limited (PCUL) is a not-for-profit organization. It initially registered as a non-profit corporation with the Wisconsin Department of Financial Institutions on 3/4/2022, for its stated purpose being “economic development, place making, and collaborative activities in the County.” According to its by-laws, it is organized exclusively for charitable and educational purposes within the meaning of section 501(c)(3) of the Internal Revenue Code. As such, it is eligible for a United States Environmental Protection Agency (USEPA) Brownfields Cleanup Grant.

2. Previously Awarded Cleanup Grants

The Site has not received funding from a previously awarded USEPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

PCUL does not have an open USEPA Brownfields Multipurpose Grant.

4. Site Ownership

PCUL is the sole owner of the Site. PCUL acquired the property that contains the Site on November 13, 2023, and if awarded a Cleanup Grant, will retain ownership of the Site for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the Site.

5. Basic Site Information

Name of Site: Former Lionite Mill Property

Site Address: 115 Depot Rd, Phillips, WI 54555

6. Status and History of Contamination at the Site

The contamination at the site is hazardous substances. Use of the Site as a wood products production facility dates back to 1883, approximately four years after the City of Phillips was founded. The Site was largely cleared of buildings sometime between 1932 and 1939. In 1945, the office building was constructed near the south end of the Property. The initial section of the current production facility was constructed by the Wisconsin Wood Products company in 1957 and began operations in 1958. Major expansions were completed in 1965-66 and 1980-81, with smaller additions occurring until 1988. Wisconsin Wood Products operated the mill from 1958-1969, followed by Evans Product Company, Boise Cascade Corporation, and Koch Industries (which purchased Georgia-Pacific and its subsidiaries in 2005, but continued operating the plant under the Georgia-Pacific Wood Products LLC name until the plant closed in 2015). The northern portion of the main mill buildings collapsed on April 5, 2023. The site is now vacant and fenced-off.

The materials requiring abatement were identified by Price County United Limited through contracting with NorthStar Environmental Testing LLC, which completed a pre-demolition inspection for asbestos, lead-based paint, and restricted wastes on October 2-13, 2023, as summarized in a report dated October 19, 2023. Extensive materials requiring abatement or management were identified as a result of this inspection

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and form the basis for the proposed environmental cleanup activities to be funded from the USEPA grant, if awarded.

The site includes at least 41 building areas with a combined floor area of 173,378 square feet, which were constructed between 1945 and 2008. The average clearance height is near 17 feet and most of the buildings are metal sided. Based on review of historic maps, industrial areas or equipment associated with the first 50-years of development included sawmills, planing mills, wood fiber mills, dry kilns, box factories, tramways, machine shops, refuse burners, blacksmiths, carpentry shops, engine houses, ash houses, oil houses, offices, a mill pond, and massive areas of sawdust and lumber storage. Industrial areas or facilities associated with the current plant include warehouses, offices, loading docks, truck scales, debarkers, chip silos, conveyor belts, dust collectors, silos, maintenance shops, dryers, cyclones, humidifiers, and a paint room. During this time, regulatory databases and prior investigations have documented the storage, handling, and use of a variety of hazardous wastes and petroleum products. With respect to bulk storage, (7) removed/closed USTs, (2) closed ASTs, and 10 in-use ASTs containing these materials have been identified in these databases. In addition, there are records for at least six spills that were reported to WDNR and cleaned up. Although there may be residual soil and groundwater contamination associated with these past industrial activities, there is currently no contamination that is known that would require response actions – in particular – if the site remained in industrial use.

7. Brownfields Site Definition

The Site is real property, for which reuse is significantly complicated by the presence of hazardous constituents associated with previous uses and activities. Per CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and “Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k),” the Site is: (a) not listed or proposed for listing on the National Priorities List; (b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and (c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

A Phase II environmental site assessment for the property was completed in 2022 for the previous owner. The report was dated December 9, 2022. USEPA Brownfields Cleanup funding is being requested to address asbestos and other hazardous building materials contained in buildings at the property. An asbestos, lead-based paint, and regulated building materials survey of the buildings was completed by NorthStar Environmental during October 2023. The report is dated October 19, 2023.

9. Site Characterization

Attachment A provides a letter from WDNR affirming that the abatement activities for which Cleanup Funding will be utilized are not subject to the WDNR’s voluntary response program. An Environmental Professional (as defined in 40 CFR § 312.10) has certified that there is a sufficient level of site characterization of hazardous materials performed to date for abatement of these materials to begin on the buildings at the site.

Application by Price County United Limited for an FY2024 USEPA Brownfield Cleanup Grant for the Former Lionite Mill Property, Phillips, Wisconsin

10. Enforcement or Other Actions

There are no ongoing or anticipated enforcement actions at the property.

11. Sites Requiring a Property-Specific Determination

PCUL affirms that the property does not need a property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

As described in the response to Criterion No. 6, contamination at the Site is associated with hazardous substances. Therefore, per the guidelines, responses are provided only for items under “12.a” below which pertain to hazardous substance sites.

12.a. Property Ownership Eligibility – Hazardous Substance Sites

PCUL asserts that it has liability protection from CERCLA as a bona fide prospective purchaser, and therefore per the instructions, is providing responses below only for “12.a.iii – Landowner Liability Protections from CERCLA Liability.”

12.a.iii. Landowner Protections from CERCLA Liability

(1) Bona Fide Prospective Purchaser Liability Protection

a. *Information on the Property Acquisition:*

The property was acquired by PCUL from Phillips Lionite Wood Products LLC on November 13, 2023. The type of ownership is fee simple. PCUL has no known familial, contractual, corporate, or financial relationships or affiliations with any prior owner or operator of the property, or any potential responsible parties.

b. *Pre-Purchase Inquiry:*

A Phase I ESA of the property was completed by Stantec Consulting Services, Inc. (Stantec) for PCUL on November 9, 2023, prior to acquisition of the property by PCUL on November 13, 2023. The Phase I ESA was prepared per the All-Appropriate Inquiries rule in accordance with ASTM Standard E1527-21 and completed by staff who meet the definition of an Environmental Professional as defined in 312.10 of 40 CFR Part 312 and ASTM E1527-21. The firm conducting work documented in the Phase I ESA was a qualified, professional engineering firm that was selected to perform the work based on their relevant experience and credentials.

c. *Timing and/or Contribution toward Hazardous Substances Disposal:*

All disposal of hazardous substance at the property occurred prior to acquisition by PCUL. PCUL did not cause or contribute to any releases of hazardous substances at the property. Furthermore, PCUL has not at any time arranged for the disposal of hazardous substances at the property or transported hazardous substances to the property.

d. *Post-Acquisition Uses:*

There are no current active uses of the property by PCUL or other entities. The property is currently fenced, locked, and secured from access by the public.

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e. Continuing Obligations:

No contamination has been identified at the property for which continuing obligations would apply.

PCUL affirms its commitment to: (i) comply with all land use restrictions and institutional controls; (ii) assist and cooperate with those performing the cleanup and provide access to the property; (iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property, and (iv) provide all legally required notices.

12.b. Property Ownership Eligibility – Petroleum Sites

Not applicable.

13. Cleanup Authority and Oversight Structure

13.a. Cleanup Oversight:

Abatement projects in Wisconsin are overseen by staff at the Wisconsin Department of Natural Resources (DNR). PCUL will rely on outside consultants procured in accordance with procurement provisions of 2 CFR §§ 200.317 through 200.326 to provide necessary oversight and technical expertise necessary for cleanup.

13.b. Access to Neighboring Properties (if required):

Not applicable. No cleanup activities will be performed using USEPA funds will require access to neighboring properties.

14. Community Notification

a) Draft Analysis of Brownfield Cleanup Alternatives

The draft ABCA and application narrative were made available for public review at a public meeting hosted by PCUL on November 8, 2023. Copies of the draft ABCA and narrative were posted on the PCUL website on November 8, 2023. A copy of the draft ABCA, as updated in response to public comments, is provided as **Attachment B1**.

b) Community Notification Ad

A community notification ad was placed on the PCUL website on October 29, 2023 and a notice for the meeting was also posted on the City of Phillips public library notice board on October 29, 2023. A copy of the community notification documentation is provided as **Attachment B2**.

c) Public Meeting

A public meeting was held on November 8, 2023. The meeting was hosted by PCUL. Documentation for this meeting is attached. A meeting summary (which includes public comments and PCUL's responses) is provided as (**Attachment B3**). Attendees at the meeting are identified in the meeting summary. No additional questions or comments regarding the grant and/or draft narrative or ABCA beyond those at the meeting on November 8, 2023.

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d) Submission of Community Notification Documents

The following required community notification documents are provided as attachments:

Attachment	Description
B1	A copy of the draft ABCA, as updated in response to public comments received.
B2	Documentation of community notification to the public and solicitation for comments on the proposal, including a printout/screenshot of the notification posted on October 29, 2023.
B3	A meeting summary, including public comments regarding the application and ABCA, and the responses provided by the PCUL.

15. Contractors and Named Subrecipients

PCUL has not retained a contractor for work that will be paid for by the grant if awarded.

There are no subrecipients named in the grant application.



November 8, 2023

Lynda Ludwig, President
Price County United Limited
N9751 Bass Lake Lane
Phillips, Wisconsin 54555
Via Email Mail Only to [REDACTED]

**Subject: State Acknowledgement Letter for Price County United Limited
FY24 EPA Brownfield Cleanup Grant**

Dear Lynda Ludwig:

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

The DNR is fully committed to a collaborative partnership with PCUL, 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.

FY24 Cleanup Grant: Site(s) Eligibility, Characterization, and Readiness for Remediation

For FY24, EPA requests that certain applicants for cleanup grants submit a letter from the state describing site eligibility and whether there is “a sufficient level of site characterization from the environmental site assessment performed to date (or will be by June 15, 2024).”

- **Eligibility.**
 - The applicant states that there is currently no known hazardous substance discharge that requires response actions if the site remains in industrial use. This site is the location of multiple activities that were previously regulated under the state’s response program and are now closed. These closed activities include six spill cases and two instances of petroleum discharges from leaking underground storage tanks.
 - The proposed activities explained by the applicant are not subject to regulation under Wisconsin’s response program; while the activities are regulated under other sections of state law, they are not part of the Wisconsin’s cleanup program and its governing administrative code, Wis. Admin. Code chs. NR 700-799, and statute, Wis. Stat. ch. 292.

- As an inactive cleanup site, this site is not currently eligible for enrollment 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. The activities proposed for grant funding would also not be eligible for the Voluntary Party Liability Exemption (VPLE) program under Wis. Stat. § 292.15.
- ***Environmental Professional (as defined in 40 CFR § 312.10) Certification of Site Characterization Status.*** David Holmes of Stantec Consulting Services submitted a request, dated Nov. 7, 2023, for an acknowledgement letter from DNR on behalf of PCUL, and certifies the following in the request letter (attached):

I am a professional geologist in Wisconsin, have over 35 years of experience as an environmental professional, and am an environmental professional as defined under 40 CFR 312.10. I certify that there has been a sufficient level of characterization from the environmental site assessment performed to date for remedial work to begin on the site. This certification is specific to asbestos, lead-based paint, universal wastes and other regulated building materials and equipment that are the focus for this specific application and the proposed cleanup activities to be funded by the grant.

Sincerely,

Christine Sieger

Christine Sieger, Director
Remediation and Redevelopment Program
Wisconsin Department of Natural Resources

Attachment:
Request dated November 7, 2023

cc:
Phillip Richard, DNR Northern Region – phillip.richard@wisconsin.gov
Barb Herbst, DNR Northern Region – barbara.herbst@wisconsin.gov
David Holmes, Stantec – david.holmes@stantec.com