



CASTLO Community Improvement Corporation
US EPA Brownfield Hazardous and Petroleum Cleanup Proposal
EPA-OLEM-OBLR-18-07

Narrative Information Sheet

1. **Applicant Identification:** CASTLO Community Improvement Corporation
100 South Bridge Street
Struthers, OH 44471
Phone: (330) 750-1363
e-mail: slown@westernreserveport.com
2. **Funding Requested:**
 - a. Single Site Cleanup
 - b. Federal Funds Requested:
 - i. requested amount: \$492,000
 - ii. cost share: \$99,000
 - c. Contamination Indicate: “hazardous substance and petroleum”
3. **Location:** City of Struthers, Mahoning County, Ohio
4. **Property Information:** CASTLO Industrial Park, Area A,
100 South Bridge Street,
Struthers, Ohio 44471
5. **Contacts:**
 - a. **Project Director:** Sarah Lown, Executive Director
 - b. **Chief Executive Officer:** Randall Partika, Chairman of the Board
6. **Population:** 10,111 (US Census 2019)
7. **Other Factors:**
 - ✓ Community Population is 10,000 or less
 - ✓ Secured firm leveraging commitment tied directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation
 - ✓ The proposed site is adjacent to two bodies of water –Yellow Creek and the Mahoning River.
 - ✓ Project is located in a federally designated flood plain.
 - ✓ The proposed clean-up will facilitate renewable energy from wind, solar, or geothermal energy; or will incorporate energy efficiency measures.
8. **Letter for the Ohio Environmental Protection Agency**
On the following page

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. **Background and description of target area** begins in 1977 when Youngstown Sheet and Tube closed the doors of its plants in Struthers, Campbell and Youngstown leaving 27,000 workers unemployed and gutting out the economic base of the region. The City of Struthers grew with the steel industry. Mills flanked the Mahoning River Valley with company-owned row housing along the slopes, front doors all facing the River. Those homes were all occupied by families employed at the steel mills. They walked down the hill to work every day. They stopped at the bar, or the pizza joint in downtown Struthers before heading back up to home at the end of the shift. Now residents are employed primarily in health care, manufacturing and construction. Most work out of town, with an average twenty-four-minute commute each day (US Census 2010).

The target area is the CASTLO Industrial Park, which sits in the heart of downtown Struthers. A group of state and local leaders came together to form the *CASTLO Community Improvement Corporation* in response to the economic blow from the steel mills. The CASTLO CIC acquired the abandoned property and sought to retrofit its land and buildings into an industrial park that enhances the historic downtown and affords job opportunities.

The CASTLO Industrial Park's 120 acres houses 10 businesses and employs more than 140 people. The remaining undeveloped acreage in CASTLO is the only portion available to the city for new economic development. The primary barrier to redevelopment at CASTLO relates to the environmental concerns.

ii. **The brownfield site can be described** as 8.5 acres on the main street of the downtown, with a 60,000 square foot, century-old brick mill building overlooking Bridge Street, the main thoroughfare through downtown. It was once the warehouse and distribution site for Youngstown Sheet and Tube, now it is used for industrial storage.

Yellow Creek serves as the eastern boundary of Area A. The Creek has a metropark adjacent to the CASTLO Industrial Park, which is a popular destination for fishing and hiking.

Seven on-site remediation areas have been delineated and are ready for mitigation or removal. The onsite chemical of concern which exceed applicable standards include arsenic, lead, cadmium, mercury and total petroleum hydrocarbons. The situation is severe because two of the remediation areas are within 200 feet of two surface water bodies, the Mahoning River and Yellow Creek. The remaining five remediation areas are located upgradient of the surface water bodies.

b. Revitalization of the Target Area

i. **Reuse strategy and alignment with revitalization plans:** The reuse strategy is to enhance connections between the downtown, the River, the recreational amenities and park space. The plan was developed by city officials, citizens, business leaders, university partners and residents as documented in the *Connectivity Struthers Plan*, the City's downtown development plan. This plan optimizes use of the River for canoes and kayaks, while mitigating flood plain risks through storm water management flood protection measures. CASTLO partnered with the local metropolitan planning organization, the City, business and educational



leadership to optimize downtown development opportunities and deploy local and state incentives to create new economic and recreational opportunities for residents.

ii. The outcomes and benefits of reuse strategy can stimulate the economic development in the target area upon completion of the project by partnering with developers to develop an event center, artisan incubator and through the clean-up and revitalization of an important district, improving property values of the target site and surrounding properties. It will also extend the existing metropark district by extending parklands along the Yellow Creek corridor, adding a canoe launch, walking paths, gathering space, fishing holes, and picnic spaces.

The proposed project sits within an Opportunity Zone, where investors are already considering making an investment in the target area and in other projects underway within the CASTLO Industrial Park, including a galvanizing mill and light manufacturing operations.

The proposed project will promote the sustainable reuse of existing buildings by restoring an historic mill building, installing energy upgrades to the building, and remediating the natural habitats along the riparian corridor of Yellow Creek.

The reuse of the proposed site will facilitate renewable energy from solar to offset electric consumption, through the installation of solar panels on the roof of the 60,000 square foot building.

1.c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse become more accessible when the target area is fully remediated through US EPA clean-up funding. CASTLO will pursue funding from the US Economic Development Administration and Historic Tax Credits for building restoration, the Ohio Department of Transportation Jobs and Commerce Program for repaving, Ohio's Department of Natural resources for park space and a canoe launch, the Ohio Employment Training program, which provides training funds for new employees, and Jobs Ohio, which assists in financing private business expansion.

Funding resources secured to support the completion of remediation and reuse for the proposed brownfield site include private investment from the CASTLO CIC and \$225,000 from the Appalachian Regional Commission for utility upgrades at the target area. Documentation is attached.

ii. Use of existing infrastructure, including the existing entryway and interior roadway will see greater traffic volumes with added industry and recreational activity to the target site. With 480 Kv electric service, the existing building has broad capacity to supply the energy needs of any industry wishing to locate operations in the target area. Natural habitats and parklands will become enhanced through clean-up and restoration.

Expansion and improvements to the existing parking area are the only infrastructure enhancements that will be needed to the target area. The existing Appalachian Regional Commission grant will enable utility extension work to be completed.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a.i. Community's Need for funding in City of Struthers gets more critical each year as the last decennial population shrinks 1.5% annually (US Census 2019). This steady decline results in a steady 2% annual reduction in the tax base to the City according to the Struthers City Auditor.



The population base is aging and becoming more low income at \$20,722 per capita (US Census 2018, ACS). The median household income is \$39,055, which is 28% below the national median. Opportunities for growth are not possible with the shrinking economic base because the City is built out. The CASTLO Industrial Park is one of the last areas where development could take place. By remediating and redeveloping this area, new economic horizons open up.

a.ii. Threats to Sensitive Populations exist due to contaminants found in the soil, including arsenic, lead and mercury discovered in phase 2 investigations.

(1) Threats to health of welfare experienced by sensitive populations in the target areas include women of child-bearing age being impacted by the existence of heavy metals and petroleum contamination in the soil. These contaminants are known risks to fetal health. Children playing along the banks of Yellow Creek risk exposure to lead, petroleum-related chemicals, mercury and arsenic.

(2) Greater than normal incidence of disease and adverse health conditions in the target area is found in extremely high infant mortality rates, high incidence of asthma and high number of deaths of despair. Infant mortality rates have been 8.8 per 1,000 for the past five years, according to the Mahoning County Health District). That is 57% above the national average of 5.3 per 1,000 (US CDC). This is largely due to premature birth and congenital anomalies or birth defects (Mahoning County District Board of Health, 2016). Further, The Ohio Department of Health reports asthma rates of 17.3%, fully 9% higher than the national average. Environmental clean-up will reduce risk of contaminated airborne particulate matter containing lead, arsenic and mercury contributing to the problem. Deaths of despair in Mahoning County reach an astonishing 80.5 per 100,000, compared with the national average of 45 per 100,000. According to Well Being in the Nation, a think tank on public health, this is due to lack of opportunity, economic, community vitality and it is exacerbated when people feel helpless about their lives. Opportunities for improved quality of life and economic opportunity as are proposed at CASTLO promise to help mitigate this problem.

(3) Disproportionately impacted populations experience negative environmental consequences resulting from heavy industrial steel operations historically concentrated in the central business district in the heart of the Mahoning River Valley. Decades of restrictive uses on brownfields, barriers to financing, lack of funding and disinvestment in former manufacturing centers have resulted in economic devastation. Residential populations occupying homes along the hillsides adjacent experience higher levels of poverty and unemployment because the economic opportunities dried up after the mass closing of the steel industry in the 1970s. This project opens 8.5 acres to new development and job-creation. It also transforms the manufacturing character of the community into a walkable, healthy and vibrant downtown.

B. Community Engagement

i. Project Involvement

The CASTLO Community Improvement Corporation is the primary community-based organization that catalyzes change. This entity was formed in response to the closing of the steel industry in the region in 1978. Since that time it created the Mahoning River Corridor Initiative, which brings together all the relevant industry leaders, academic institutions, planning organizations, conservation groups and recreational associations for the purpose of cleaning up the brownfields along the Mahoning River Corridor and repurposing them for public and private



use. CASTLO also initiated the Mahoning River Corridor Mayors Association, which provides leadership in revitalizing all the urban centers along the former industrial cities in the region. These entities serve as vital partners in coordinating all initiatives to clean up, revitalize and repurpose the former industrial sites. CASTLO established a Community Fund, which is invested in the Youngstown Foundation. Each year CASTLO distributes scholarships, funds civic enhancements, and supports other community-based initiatives.

CASTLO is governed by 24 board members who represent a balanced mix of professionals who are elected leaders, business owners, university faculty, financiers and community leaders. In over 40 years, they have served as the primary force for economic development and community revitalization.

ii. Project Roles

The organization/entity/group identified below is on the front lines of revitalizing brownfields in Struthers and in the Mahoning River Corridor, where the of former steel mills are located. This is the social infrastructure established by CASTLO’s board in order to effect region-wide transformation from an industrial hub to a diverse economy with varied and rich quality-of-life amenities.

COMMUNITY PARTNER	POINT OF CONTACT	SPECIFIC INVOLVEMENT IN THE PROJECT OR ASSISTANCE PROVIDED
City of Struthers	Mayor Catherine Cercone Miller Mayor@cityofstruthers.com 330.519.2931	Assist in roadway construction, parking area to cap identified area of concern, build safety service boat launch, and build park & gathering space
Irons Mills Inc.	Stacy Milliron stacy@ironsmills.com 724.816.0137	Locate event center and artisan incubator in Area A.
Struthers Rotary	Jennifer Johnson JJohnson@aqu.com 330.397.7597	Assist in developing community gathering areas, constructing fishing holes and parks along Yellow Creek
Mahoning River Corridor Initiative	Zach Svette, Chairman mposvette@co.trumbull.oh.us 330.675.3072	Coordinate the clean-up of the dams along the River and brownfield clean-up proposals to promote cooperation over competition among regional partners.
Mahoning River Corridor Mayors Association	Mayor James Melfi, Chairman koleary@cityofgirard.com 330.545.3306	Advocacy for brownfield cleanup and economic revitalization of the Mahoning Valley’s legacy cities. It includes Mayors from the nine (9) cities located along the Mahoning River

iii. Incorporating Community Input

CASTLO board and staff serve on boards of community-based organizations/entities and groups, including Rotary, City Council, School Board, Mahoning River Corridor Initiative, and Mahoning River Corridor Mayors Association. CASTLO meetings include community input on each agenda where each member of the board is invited to share and apprise the CASTLO Community Improvement Corporation about ongoing initiatives, happenings and areas of concern.



3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The remedial approach preferred for this site incorporates a combination of alternatives selected to tailor the mitigation efforts to the specific site conditions and cleanup objectives for each area requiring a remedy. For example, source removal via ‘excavation and disposal’ will be performed in Remediation Areas R-1 through R-5 and an asphalt pavement engineering control will be used to block the direct-contact exposure pathway in Remediation Areas R-6 and R-7. Source removal and disposal offers a significant benefit in that the contaminated soil would no longer be available at the site to be a source of potential human health risk, environmental harm, or an impediment to future development plans. However, source removal and disposal is a more costly approach than utilizing a pavement engineering control as a barrier to the direct-contact exposure pathway. This is especially true in Remediation Areas R-6 and R-7 where development plans already call for the installation of a parking lot. Therefore, in R-6 and R-7, the selected remedial approach consists of implementing an engineering control (i.e., parking lot pavement and associated clean fill for landscaped areas). This approach also has the added benefit of providing the required grant matching funds and incorporating community involvement into the cleanup project because the City has already committed to the pavement/landscape area using funding outside of the USEPA grant funds.

The selected combination of remedial alternatives also provides a degree of flexibility with respect to overall project cost controls. For example, if an unexpectedly large amount of the contaminated soil in R-1 through R-5 is determined to be hazardous or if the contaminated soil volume exceeds the amount that can be cost-effectively removed and disposed, engineering controls can be implemented in these Remediation Areas, as required, to complete the remedy within the available budget. The preferred cleanup approach will maximize the benefits of the remedial actions toward project objectives while maintaining good use of required resources (e.g., energy needed for remedial actions and prudent use of limited landfill space).

3b. Description of Tasks and Activities (12 points)

A *Request for Qualifications (RFQ)* will be prepared, issued, and legally advertised by CASTLO to initiate a competitive process for the selection of a Qualified Environmental Professional to guide, oversee, document, and certify the remedial work to be performed under the USEPA Cleanup grant. The remediation will be conducted in conformance with the Ohio Voluntary Action Program (VAP), which is the regulatory program for brownfield cleanup in the State of Ohio. As such, the Environmental Professional Work shall be a VAP Certified Professional.

Under the guidance of CASTLO and the USEPA Project Manager, the selected Environmental Professional will prepare a *Quality Assurance Project Plan (QAPP)* for hazardous substance cleanup because lead, arsenic, and mercury are primary contaminants of focus in addition to other metals and petroleum compounds). The QAPP will be submitted for USEPA comment and approval and will be implemented to ensure that grant-funded work achieves intended goals within acceptable standards.



The following tasks will be implemented by the selected Environmental Professional and the competitively bid and selected remediation contractor under the direction of CASTLO:

Task 1: Project Management & Coordination

The Environmental Professional will manage the remedial project tasks and coordinate with CASTLO, the USEPA Project Manager and the Ohio EPA VAP site coordinator. A Property Survey will be performed under this task to provide legal descriptions for the engineering controls and the environmental covenant that stipulates the land use restrictions in accordance with the Ohio EPA VAP. Preparation of project management documents such as the QAPP, community involvement plans, the Final Analysis of Brownfields Cleanup Alternative (ABCA) document, and the Remediation Contractor detailed scope of work for competitive bid solicitation will also be performed under this task

Task 2: Remedial Actions

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

- Prepare and implement a site-specific Health & Safety Plan. The soil Remediation Contractor will be responsible for the health and safety of its workers and for securing the work site with respect to health and safety matters (e.g., providing a security fence and warning signs around all open excavations).
- Obtain the necessary permits for this project.
- Properly characterize (waste profile) the excavated material for disposal.
- Excavate the contaminated material (e.g., soil and concrete) in the Remediation Areas R-1 through R-5 as directed by the Environmental Professional.
- Load, transport, and dispose of the excavated material at a facility licensed for the treatment and/or disposal of the contaminated soil. It is estimated that 1,731 tons of soil will be removed and disposed of from Remediation Areas R-1 through R-5.
- Provide signed manifests and weigh tickets for each load of excavated material removed from the site and disposed of at a licensed disposal facility.
- Transport, backfill and tamp the clean fill into the excavation sufficient to return the excavation to the surrounding grade using suitable and clean material from an off-Property source area approved by the VAP Certified Professional.
- Provide an affidavit certifying the source of any off-site fill to be brought onto the site is clean with respect to environmental contamination. The source of clean fill to be used at the site is subject to approval by the Environmental Professional. If there is any reason to believe, at the sole discretion of the Certified Professional, that the source of clean fill may have been impacted by petroleum or hazardous substances, the source will be rejected for use on this project.



Confirmatory sampling at the Property will be conducted by the Environmental Professional, as may be required, for the purpose of determining that project objectives are met. Pre-characterization sampling and analysis (TCLP) of soil for disposal must be conducted so that “live loading” can occur. If pre-characterization sampling profiles the on-site contaminated soil as hazardous waste, the soil must be stabilized within the footprint of the contaminated area prior to removal and disposal at a properly licensed landfill.

The Environmental Professional will also interface with the Development Contractor responsible for the construction of the planned asphalt-paved parking lot and associated landscape area (Remediation Areas R-6 and R-7). The Environmental Professional will ensure that the specifications and construction of the pavement and landscaped areas will meet the objectives to serve as engineering controls to block the soil direct-contact exposure pathways.

Task 3: Confirmatory Sampling and Monitoring Well Abandonment

The Environmental Professional will obtain samples for analysis of chemicals of Concern (COCs) along the proposed excavation to confirm that the contamination perimeter meets the appropriate VAP standards (i.e., 800 mg/kg limit for lead within a depth of 0-2 feet). The Environmental Professional will perform aquifer sampling and testing prior to abandoning the project monitoring wells. Following the receipt of laboratory analytical and final affidavits, the project monitoring wells will be properly abandoned based on local, state, and federal guidelines.

Task 4: Risk Assessment/Modeling

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

Task 5: Risk Mitigation Plan and Operation and Maintenance Plan Preparation

Soil in some portions of the Property within and below 0 to 2 foot commercial/industrial point of compliance exceeds generic standards applicable to construction/excavation worker exposures. The Environmental Professional will complete a Risk Mitigation Plan (RMP) which will protect workers in the event that future subsurface construction activities encounter contaminated soils. The RMP will also provide guidelines for properly managing contaminated media that may be encountered during construction activities and requirements for restoring any breaches of the point of compliance on the Property. The Environmental Professional will complete an Operation & Maintenance Plan (O&M) in accordance with Ohio EPA VAP rules for engineering controls implemented on any portion of the Property.

Task 6: Remediation Report Preparation & Phase I Update

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

Task 7: No Further Action (NFA) Document Preparation

This task covers the preparation of the NFA document, the filing fee charged by the Ohio EPA, as well as follow up responses to NFA comments with the Ohio EPA.



The CASTLO Directors who will provide administration of the grant and oversight of the Environmental Professional and Remediation Contractor have successful grant management experience on other portions of the industrial park. This experience includes brownfield assessment, cleanup, and site redevelopment grants. CASTLO members have provided engineering expertise to oversee demolition and contaminated material removal on previous environmental restoration projects with in the industrial park.

The source of the cost share match for this grant will be from the City of Struthers. The City will receive a portion of the target Property for use as a City parking area and greenspace with access to Yellow Creek and the Mahoning River. Paving and landscaped areas that the City will construct on the Property will serve as the engineering controls required for Remediation Areas R-6 and R-7. The estimated cost of the 30,295 sq. ft. of asphalt pavement at \$5.00 per sq. ft. equates to \$151,475 of the overall cleanup estimate. The City has committed to providing at least \$100,000 toward this engineering control cost which will cover the 20% cost share match for the grant. Using this source of match funding from the City creates community involvement in the project, community use of the end result (i.e., parking and greenspace access to Yellow Creek and the Mahoning River), and benefit to the environment by creating an engineering control of an otherwise complete exposure pathway.

3.c. Cost Estimates and Outputs

The breakdown of estimated costs associated with each identified task for this project is provided in the following table:

Budget Categories (program)	CASTLO 5% Admin.	Task 1 Mgt. & Coord.	Task 2 Remed. Actions	Task 3 Confirm. Sampling	Task 4 Risk Assess.	Task 5 RMP O&M Prep	Task 6 Report Prep	Task 7 NFA Prep &Cont.
Personnel	\$23,472							
Fringe Benefits								
Travel								
Equipment								
Supplies								
Contractual		\$16,130	\$358,204	\$23,970	\$14,880	6,840	\$17,840	\$31,580
Other								
Total Federal Funding (< \$500,000)	\$23,472	16,130	258,204	23,970	14,880	6,840	17,840	31,580
Cost Share (20% of requested federal funds)			\$100,000					
Total Budget (Total Direct Costs + Indirect Costs+ Cost Share)	\$23,472	\$16,130	\$358,204	\$23,970	14,880	\$6,840	\$17,840	\$31,580

The following unit rates were used in the calculation of the estimated cost for each task in the above budget table:

Labor

- Certified Professional \$140 per hour
- Senior Project Manager \$110 per hour

- Staff Geologist \$80 per hour
- Draftsperson \$65 per hour
- Clerical Office Support \$40 per hour

Direct Costs / Expenses

- Travel Mileage \$ 0.52 per mile
- Contractor Mobilization/Demobilization \$ 3,500 est.
- HASP & Permits \$ 6,500 est.
- Excavate/Transport/Dispose contaminated soil (non-haz) \$ 70 per ton
- Clean Fill Acquire/Transport/Place/Seed \$ 26 per ton
- Installation of Asphalt Pavement/Sub-Base \$ 5.00 per sq. ft.
- Laboratory Analysis Budget (Confirmatory Samples) \$ 5,100 est.
- Drilling Contractor (Sampling/Well Abandonment) \$ 9,500 est.
- Ohio EPA No Further Action – VAP Filing Fee \$20,000

3.d. Measuring Environmental Results

Based on our past experience with brownfield cleanup and redevelopment projects of this nature, we believe that the following represents pertinent project milestones and realistic completion timelines for this project:

<u>Task Description</u>	<u>Duration</u>	<u>Completion Time from Start Date</u>
Prepare RFQ and Solicit Qualifications	2.0 months	2.0 months
Select Environmental Professional	1.5 months	3.5 months
Prepare/Submit/Approve QAPP	2.0 months	5.5 months
Prepare Soil Remediation Bid Documents	3.0 months	8.5 months
Solicit Bids & Select Contractor	1.5 months	10 months
Soil Remedial Actions	3.0 months	13 months
Confirmation Sampling/Analysis	1 month	14 months
Remedial Action Report	2.0 months	16.0 months
NFA Preparation	2.0 months	18.0 months

We intend to hold monthly meetings with the Environmental Professional selected to implement the cleanup grant in order to track progress toward project milestones, identify issues that may cause delays, evaluate solutions to challenges that may arise, and measure overall performance toward meeting the schedule and remedial objectives. The above schedule provides for significant latitude to complete the project well within the grant performance period, even after allowing for some additional time to overcome unexpected project challenges and rectify situations that may impact the anticipated schedule.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

*Has Not Received an EPA Brownfields Grant
but has Received Other Federal or Non-Federal Assistance Agreements*

(1) Purpose and Accomplishments:



An Ohio Department of Development *Clean Ohio* grant of \$188,000 was awarded to assess and remediate the park's eastern acreage to State and Federal Voluntary Action Plan standards. The grant was administered by CASTLO, commissioning Ohio Certified Environmental Professionals to undertake assessment and remediation work. The grant was completed within one year with expenditures that came in under budget.

An Ohio Department of Development *Job Ready Site* grant of \$3,500,000 from the State of Ohio to conduct site preparations, grade 68 acres, relocate a small area of wetlands within the 120 acre industrial park, and renovate a building for a new company to locate operations at CASTLO. The grant took 18 months from the date of the award to complete the bidding process, secure contracts, complete all phases of work. Additional work –beyond the scope of the agreement—was possible because of cost containment and new revenues obtained from scrapping a building. The additional scope was renovation of a former storage building for Industrial Pipe and Supply, who created 25 new jobs as a result of the grant project. The project was done within the time line and under the budget awarded by the grant.

The Appalachian Regional Commission and the Ohio Department of Transportation Jobs and Commerce program awarded CASTLO a \$100,000 grant to extend the roadway and upgrade the park's rail line to serve a second new company to locate operations at CASTLO. The grant award came to CASTLO who leveraged the funds from the Jobs Ohio program to afford access to open acreage. This resulted in the establishment of two additional new businesses to the CASTLO Industrial Park.

Outputs accomplished with the three grants were the assessment and remediation, site preparation and infrastructure development of 68 acres. Outcomes realized were the attraction of three new companies into the Industrial Park, along with additional investment of other tenants in the Park into building renovations and creation of 53 new jobs.

(2) Compliance with Grant Requirements CASTLO met and exceeded the goals of its workplans for all four funding assistance programs on time and under budget. CASTLO meets its annual reporting requirements for all the grants awarded. Items identified in all four workplans were completed ahead of schedule and under budget, enabling additional items to be added to the scope of work with the written approval of the funder, which is the State of Ohio.

The CASTLO Industrial Park's eastern acreage is fully remediated with new infrastructure serving three new businesses as a result of the grant. Additional outcomes were realized, like attracting three new industries to the industrial park as a result of the grant awards. Annual reports were filed with the State of Ohio as required.

