



# Memo

To: Jenny Picciano

From: Michele Christina, BRS

CC: Laura Burnham, BRS

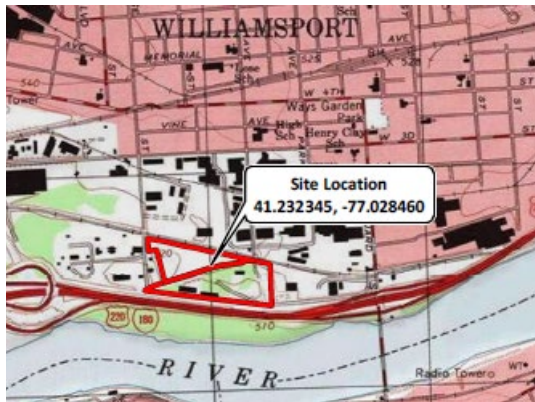
Date: October 9, 2024

**Subject: Brownfields RLF Application Technical Review  
Williamsport Ballpark Inc. Redevelopment Site**

Dear Ms. Picciano,

Please be advised that Brownfield Redevelopment Solutions, Inc. (BRS) has reviewed the above-mentioned application to the Lycoming County and offers the following comments:

**Project Overview:** The Old Williamsport Landfill is located at 2 Rose Street in the City of Williamsport, Lycoming County, Pennsylvania (Site). The Site is approximately 28.43 acres in area comprised of two contiguous parcels. From approximately 1960 to 1978, the Site was utilized for unregulated landfill operations. Wastes that were disposed include: incineration residue, commercial waste, construction and demolition waste, domestic/household waste, industrial waste, park and beach waste, patient care institution waste, septic tank waste, landscaping waste, and hazardous wastes including paint thinner, organic chemicals, and pathological and biological wastes (Converse, 2005). During its use as a landfill, and for a period of time after, waste oils were used for dust control. After the landfill operations concluded, the site was still used for the minor disposal of tree and roadway wastes through the 1980s, and for the storage of road salt and cinders until the early 2000s. Since that time, the northern portion of the Site, known as the Danneker property has been vacant and is currently vegetated. The southern portion of the Site was utilized by Susquehanna Supply Company, a construction services company specializing in bridge and road construction. Many of the previous property buildings on this parcel have been razed and only concrete slabs and a single building remain on the property.



Williamsport Ballpark Inc. (WBI), the property owner and prospective borrower, proposes to redevelop the site into a complex of six turf athletic fields with surrounding outbuildings. The scope of work proposed for EPA funds will entail the installation of stormwater management systems to manage runoff (e.g., drainage controls to mitigate the threatened release of hazardous substances).

**Site Eligibility:** The Site, also known as Property ID: 66-019-102 and 66-019-200 received EPA site eligibility approval on February 8, 2023.

**Borrower Eligibility:** WBI, the proposed non-profit borrower acquired the site through direct purchase on December 13, 2019. An Environmental Due Diligence Assessment was completed on November 12, 2019 prior to acquisition by Rettew Associates.

**Existing Environmental Assessment Reports/Nature and Extent of Contamination:**

Phase II ESA – Williamsport Landfill (October 20, 2005) – Converse Consultants: The Phase II ESA was performed to assess historical landfill operations conducted at the Danneker property from 1960 to 1978 and the use of waste oils for dust control during and after this period. Landfill materials were encountered from 2 to 36 feet below ground surface. Converse Consultants concluded that both soil and groundwater were impacted by historical landfill activities with contamination concentrations exceeding State Act 2 Statewide Health Standards (SHS) Medium Specific Concentrations (MSCs), and that fill materials were generating landfill gas.

Phase I ESA – Rose Street Property (March 3, 2016) – Pennsylvania Tectonics, Inc.: Pennsylvania Tectonics concluded that Recognized Environmental Conditions (RECs) existed for the Danneker Property relative to historical landfill activities. They also stated that a vapor intrusion investigation would be warranted for any proposed inhabitable structures based on the conclusions of the Converse Consultants 2005 Phase II ESA.

Environmental Due Diligence Assessment and Hazardous Material Survey (November 12, 2019) - Rettew: The hazardous materials survey conducted by RETTEW identified limited areas of Asbestos Containing Materials (ACM) and Lead-based Paint (LBP) contained in the former dump. The assessment concluded that there was a potential for encountering impacted media during redevelopment activities. It was recommended that a waste management plan be developed to maintain worker safety and appropriately manage wastes generated during construction activities.

**Existing Remedial Action Workplan/Contamination to be Addressed:** This project is focusing on installing a stormwater management system designed to protect the institutional control (cap) implemented after closure of the landfill (e.g., drainage controls to mitigate the



threatened release of hazardous substances). EPA funded work is to do site preparation and regrading to support eventual installation of drainage system.

**Consultation with Project's Consultant:** BRS will serve as Lycoming County's On-Site Coordinator for this site. Given the EPA funded activities do not entail conducting active remediation of a release, the borrower does not have a traditional Qualified Environmental Professional for the project.

**Estimate for Remediation / Project Expense Eligibility:** The borrower is proposing soil grading for erosion and other activities to support stormwater controls. The proposed use of funding is therefore eligible under the Brownfields RLF program. This contract is valued at \$1,114,726.91, inclusive of a 4% contingency. RLF financing contribution is a loan of \$670,000, match of \$160,000, for a total of \$830,000. Of the \$670,000 loan, \$190,000 is principal forgiveness.

**Project Schedule:** It appears that the borrower is in a position to complete the proposed project in a timely manner. Work should be able to begin and be completed within 45 calendar days after receipt of notice to proceed.

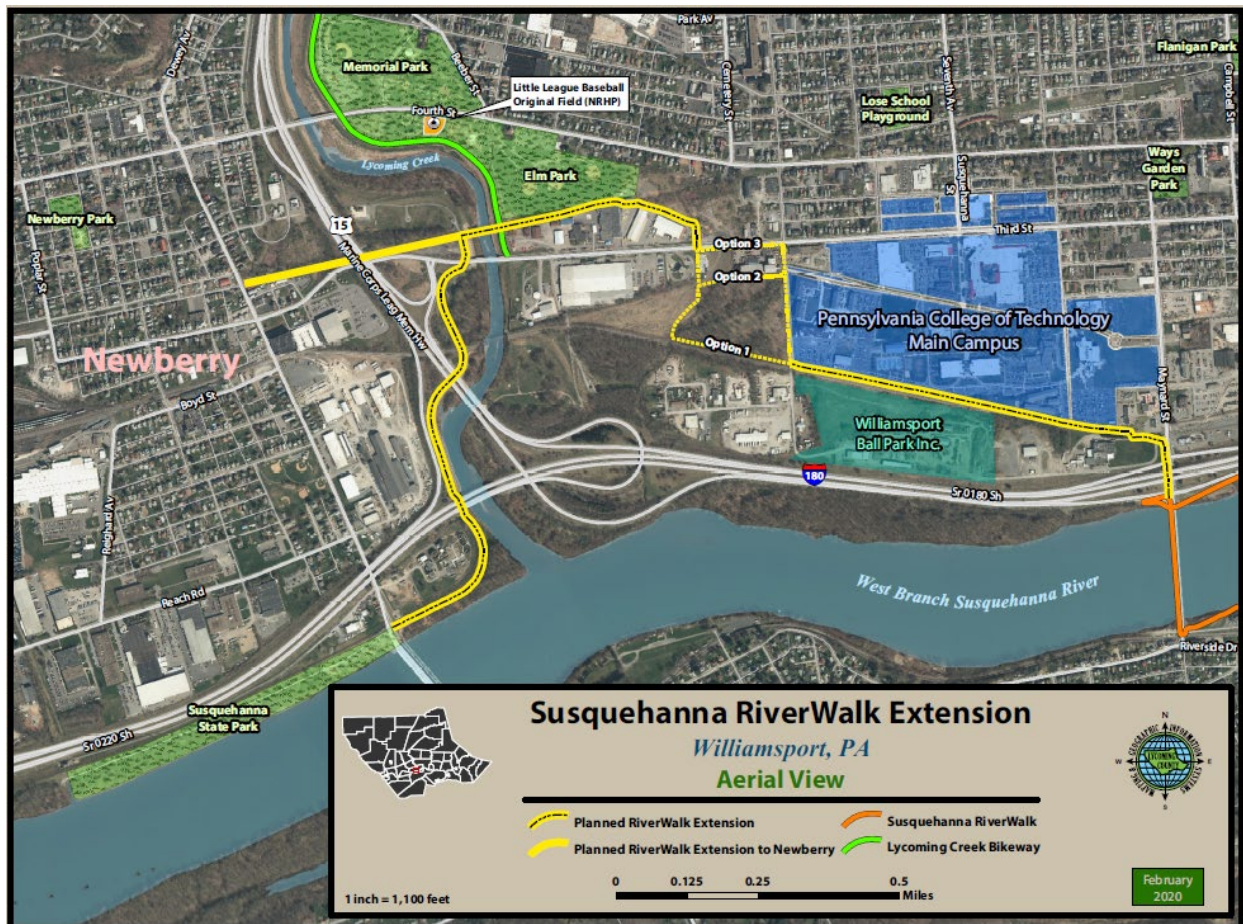
**Needed Permits and Permit Status:** The project has been coordinated with PA DEP to maintain engineering controls and eliminate potential pathways to impacted media per Environmental Covenant pursuant to Act 2 and other regulations. The departments of NPDES (wetlands discharge), Land Use and Waste reviewed the construction plans and, after several additional submittals, provided letters of approval for the project. A NPDES permit approval letter was issued by PADEP on 5/1/2024. The RI Report/Act 2 Cleanup Plan approval was issued by PADEP on 9/13/2024. The Waste Management Work Plan was issued 9/16/2024 and caveated a condition to submit a Preparedness, Prevention, and Contingency Plan (PPC Plan). The PPC Plan was submitted to PADEP on 10/4/2024.

**Federal Cross-cutting Requirements- National Historic Preservation Act (Section 106) /Endangered Species Act/Clean Water Act (Section 404):** The Site has no known historic assets and fish, wildlife or plants that will be threatened by the proposed construction. PA DEP has reviewed the construction documents and provided an approval for the NPDES permit modification on 5/1/2024.

**Proposed Reuse:** The site is to be redeveloped into an athletic complex of Little League and college baseball fields with supporting infrastructure. Development of the complex is not part of the remediation effort being funded with EPA RLF monies.



**Applicable Local Planning Compliance:** This project aligns with the County’s 2018 Comprehensive Plan citing brownfield redevelopment as a priority to overcome the effect of these properties on economic growth and reinvestment. The plan suggests that some properties such as the former Williamsport Landfill will require public/private partnership to reach their full potential. Furthermore, a feasibility study has shown that the complex has the potential to attract close to 400,000 people to the city, including teams and tournaments attracted to play at the home of Little League World Series Baseball. This would provide an important tourist destination with the capacity to spur economic development for the city and county.



**Additional Funding (EPA, HDSRF, etc.) Previously or Proposed for Assessment / Remediation:** The Chamber of Commerce, affiliated with WBI, receives funding from local hotel tax and will be providing \$160,000 in match from their annual funding allocations.

**Redevelopment Funding Sources Attained / Applied For:** The Chamber of Commerce who is managing the redevelopment of the Site has received over \$5 million from various state grant



programs, including \$2 million in RACP funds (awarded in 2020) and funds from the PA Department of Community and Economic Development's blight remediation program. The County approved an additional \$1 million in American Rescue Plan Act (ARPA) funds for the ballpark in March 2024. The City of Williamsport has committed \$1 million, in addition to \$1 million annually for debt service.

***EPA Requisite Benefits for Subgrant Projects:***

While not technically a subgrant project, there will be principal forgiveness associated with the loan. As such, the project does provide for realized subgrant project benefits.

1. The extent to which the grant will facilitate the creation of, preservation of, or addition to a park, greenway, undeveloped property, recreational property, or other property used for nonprofit purposes;

*The EPA funded work will prepare the site for its targeted reuse.*

2. The extent to which the grant will meet the needs of a community that has the inability to draw on other sources of funding for environmental remediation and subsequent redevelopment of the area in which a brownfield site is located because of the small population or low income of the community.

*Williamsport is an economically distressed small city of 27,068 within a rural county that has experienced significant job and 40% population loss since the 1960s. The current poverty rate is 25.42% and the median household income is only \$48,388 - 33% lower than the Pennsylvania median income of \$73,170. The resulting declining tax base (-60%) makes EPA support critical to the funds the county needs to move this promising project forward.*

3. The extent to which the grant will facilitate the use or reuse of existing infrastructure.

*The WBI Site is located in downtown Williamsport, adjacent to I-180, a spur highway that travels south along the Susquehanna River to I-80 the major transcontinental freeway that runs from NY to CA. The proposed redevelopment will also benefit from easy access to the utilities and infrastructure of Williamsport. The Susquehanna RiverWalk extension is planned to border the Site, providing bike and pedestrian access to it, downtown, the river and other outdoor recreation opportunities.*

4. The benefit of promoting the long-term availability of funds from a revolving loan fund for brownfield remediation.

*The project will use 100% of the loan/subgrant funding available. While a small percentage of the loan will be forgiven, the majority of Lycoming County's EPA RLF award will be used for a single loan; no outright subgrants are to be awarded*



*in this program. Moreover, the proposed term for the loan repayment is six years. Both of these considerations will promote the County's long-term availability of funding to revolve and be used on future remediation projects.*

**Overall Sense of Readiness/Issues to be Noted:** Given the above-mentioned eligibility of the both the subject site and the borrower, this project appears to be ready to receive funding with work that can begin immediately once the notice to proceed is issued. In conclusion, we note the following:

- *Potential Funding Gap:* The scope of work proposed for this remediation phase is fully funded.
- *Committed Non-Federal Match:* WPI has committed funding the requisite match not only for this project, but also for the entirety of Lycoming County's Cooperative Agreement. Funding for the \$160,000 match is to come from non-federal hotel tax revenues.
- *Procurement Review:* The associated bid specifications were provided by the owner for a pre-solicitation review for prevailing wage/Davis Bacon Act requirements.
- *Ability to Complete Remediation:* The possibility exists that unforeseen underground conditions will be encountered during the installation of the stormwater management system and additional funds may be required.
- *Regulatory Approvals:* All three outstanding PADEP approvals have been provided.

