# **COMMUNITY INVOLVEMENT PLAN**

# US EPA REGION 7 BROWNFIELDS ASSESSMENT GRANT BF#:97782001

211 & 213 E Broadway St, Stanwood, Iowa 52337

**Prepared for:** 

CITY OF STANWOOD 209 E Broadway St Stanwood, IA 52337

**Prepared by:** 



East Central Intergovernmental Association 7600 Commerce Park
Dubuque, IA 52002

February 2022

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### 1.0 INTRODUCTION

The City of Stanwood applied for a grant and a loan with East Central Intergovernmental Association (ECIA) to cleanup identified environmental contaminants at 211 & 213 E Broadway St in Stanwood, Iowa (site). ECIA will utilize a U.S. Environmental Protection Agency Brownfields RLF Grant program to evaluate, design and implement a permanent cleanup remedy for the contaminated site. Cleanup of the site will enable the City to make a sound decision regarding the future use of the site and help protect the environment and mitigate the risk of potential human exposure. The City plans to seek a developer to remodel and redevelop the subject property. Redevelopment of the site would eliminate the blight and nuisance.

The CIP has been designed to reach active citizens in the Stanwood community who will provide meaningful input and active involvement on the proposed cleanup and reuse project for 211 & 213 E Broadway St. Outreach is critical for assuring the local investment of public funds is considerate of community priorities, neighborhood livability and environmental justice and equality. The long- term success of the project will be enhanced through a community that has a say during the development phase, and ultimately supports the project mission.

### 2.0 CONTACTS AND INFORMATION REPOSITORY

The City Contact for this project is Stephanie VonBehren, City Clerk who may be contacted at:

City of Stanwood 209 E Broadway St Stanwood, IA 52337 stanwood@netins.net (563) 942-3340

The information repository for this project including the environmental assessments and Analysis of Brownfields Cleanup Alternatives is located electronically at:

https://www.ecia.org/brownfields/brownfields public repositories/stanwood.php

Individuals may view the public repository online 24/7 or for individuals who do not have a computer access to the public repository can be made with public computers at the Stanwood Public Library, 202 E Broadway St, Stanwood, Iowa during normal business hours of Monday: 2-5PM; Tuesday: 2-7PM; Wednesday: 1-6PM; Thursday: 4-6PM; Friday: 9AM-4PM; and Saturday: 10AM-2PM.

The U.S. EPA Region 7 Project Manager is Jennifer Morris, who may be contacted at:

Brownfields and Land Revitalization
Region 7 EPA
11201 Renner Blvd
Lenexa, KS 66219

Morris.jennifer@epa.gov
(913) 551-7341
http://www.epa.gov/region07/

The environmental consultant assisting with this project is Mike Fisher, of Impact7G, Inc. who may be contacted at:

Impact 7G, Inc.
9550 Hickman Rd Ste 105
Clive IA 50325
<a href="mailto:mfisher@impact7g.com">mfisher@impact7g.com</a>
(319)551-1579

The project manager for the ECIA Brownfields RLF program is Dawn Danielson, who may be contacted at:

ECIA
7600 Commerce Park
Dubuque, IA 52002
ddanielson@ecia.org
(563)580-1976

# 3.0 SITE LOCATION AND DESCRIPTION

The Site, was developed with a two-story commercial building approximately 2,080 sf located at 211 E Broadway St and 3,780 sf commercial building located at 213 E Broadway St, Iowa (refer to Appendix A & B). The property consists of approximately 0.12 acres on parcel # is 0460-02-24-308-007-0 & 0460-02-24-308-008-0. The original structures were built circa 1910. The buildings have been primarily vacant for several years.

The Site is located in downtown Stanwood adjacent to the city building at 209 E Broadway St and north of the Union Pacific Railroad tracks in the center of Stanwood. Adjoining Properties consist of

North: a bank and vacant lot

• East: a masonic lodge

South: a vacant lot and railroad tracksWest: Stanwood Municipal building

### 4.0 SITE HISTORY

Based on a Phase I Environmental Site Assessment conducted by Terracon, Consultants, Inc. (Terracon) in July 2021 the site was first developed circa 1910. The 1915 Sanborn map depicts that the site was utilized as an office, city hall/fire department and confectionary (candy store).

Historical city directories and Sanborn maps along with aerial photographs reflect the follow time table for Property use:

Year(s)	Description
1910:	Site undeveloped
1915:	Site utilized as office, city hall/fire department and confectionary candy
	store
1936:	Property used for commercial purposes. No significant changes noted
	between 1915 and 2017 to structures.
1995-2017:	211 E Broadway St: Residential
	213 E Broadway St: Residential and insurance retail lower level
2017 to present	Vacant

Unfortunately, the buildings were not updated or properly cared for over the last decade and the back portion of the structure at 211 E Broadway St has collapsed. The buildings have become unstable and a danger to the public in addition to contributing to the blight in the city. The City of Stanwood acquired the property via Tax Sale Deed (Book 1518 Page 207-213) on April 27, 2020.

### 5.0 ENVIRONMENTAL CONDITION

The buildings are currently unoccupied. Trash and debris including furniture, appliances, and miscellaneous building material are scattered throughout the buildings. There is significant water and structural damage throughout the building. A Phase I was conducted by Terracon on 7/21/21 in general accordance with ASTM E1527-13 to identify recognized environmental conditions (REC) associated with the property. The following RECs were identified during the Phase I ESA:

- A potential release to the groundwater from the former UST on the adjoining west property could have adversely impacted the site and
- Adjoining property to the south identified as having an oil containment system

The Phase I ESA also indicated that the buildings may contain asbestos-containing materials and lead-based paint.

A Phase II Environmental Site Assessment (Phase II) was completed by Terracon on January 14, 2022. The Phase II was performed to address the REC identified in the Phase I ESA. Field activities incudes the advancement of three soil borings for the collection of soil and

groundwater samples. These samples indicated the soil had slightly elevated levels of arsenic and lead. Analytical results of soil samples detected arsenic above the State screening standards (SWS) and a single detection of lead (500 mg/kg) which exceeds the SWS of 400 mg/kg. The City of Stanwood sent the Phase I and Phase II findings to the IA DNR for review and recommendations. The IA DNR replied with a letter to the city indicating that while the levels exceeded state screening standards the site is located in a commercial area and the arsenic and lead levels represent a low risk. The DNR further indicated that the site is deferred from further environmental assessment.

An Asbestos and Lead Based Paint Inspection was completed on July 22, 2021 by Terracon Consultants, Inc. Asbestos-containing materials (ACMs) above statewide standard levels were identified in the samples collected from various areas of the buildings. Below is a table of confirmed asbestos-containing materials by homogeneous area (HA) identified by Terracon.

HA #	HA Material Description	HA Material Location	Percent/Type Asbestos	Friability	Condition	Estimated Quantity (LF)
1	Roof flashing – black, gray, and white coating	Building 213 roof, south end flashing	3% chrysotile	Non-friable	Significant damage	120 LF
2	Build-up roof – black, gray with brownfibrous insulation	Building 213 roof, south end, near roof edge	8-10% chrysotile	Non-friable	Significant damage	900 SF
2	Build-up roof – black, gray, and whitetar coating	Building 211 roof, south end, near roof edge	3% chrysotile	Non-friable	Significant damage	750 SF
3	Window glazing - white	Around the building	3% chrysotile	Friable	Damaged	7 Units
4	Window caulk - white	Around original window openings	3% chrysotile	Friable	Damaged	200 LF
8	Vinyl sheet flooring – brown and tan	Building 211 kitchen, north end apartment	25% chrysotile	Non-friable	Good	70 SF
9	Vinyl sheet flooring – brown square pattern	Building 211 kitchen, north end apartment	25% chrysotile	Non-friable	Good	70 SF
13	Vinyl sheet flooring – off-white/graysquared pattern	Bathroom of apartment 213, 2 <sup>nd</sup> floor	20% chrysotile	Non-friable	Good	70 SF
15	Terrazzo flooring	Building 213, 1 <sup>st</sup> floor paths	3% chrysotile	Non-friable	Good	525 SF
18	Vinyl sheet flooring – off-white/gray with streaks	Building 211, 1 <sup>st</sup> floor bathroom, east side	20% chrysotile	Non-friable	Good	32 SF
21	Vinyl sheet flooring – yellow, pebblepattern	Building 211, west side, middle of 1st floor	20% chrysotile	Non-friable	Good	140 SF

The ACM is considered a Category I nonfriable material and must be removed by a licensed asbestos abatement contractor and disposed of at an approved landfill.

### 6.0 SITE REMEDIATION PROCESS

A structural engineer viewed the property in January 2022 and deemed it unstable. Therefore, the site would require a RACM demolition to safely remove the asbestos contaminants. Given the proximity to neighboring structures and the condition of the buildings, both properties alongside the subject property structures will need to be vacant during the demolition to prevent injury. Terracon is in the process of draft a more specific remediation plan for contractor use during the demolition. Additionally, Terracon will be preparing an analysis of brownfield cleanup alternatives (ABCA) for public review and input. The city will be procuring a contractor who will prepare a site-specific quality assurance project plan (SSQAPP). ECIA will be working with EPA to submit a Site Inventory form to the IA Historic Preservation Office (SHPO) for review. EPA will approve the cleanup plan, ABCA, SSQAPP and SHPO prior to the demolition of the structures.

### 7.0 COMMUNITY PROFILE

The original owners of the village plat of Stanwood were William C., Samuel H. Maley, and William Preston, who obtained a tract of 880 acres of mostly agricultural lands in 1868. By 1869 the first homes, tavern, and church had been erected in the town. By 1870, the population reached 257 people and by the 1920s it nearly doubled again to 556. Below is a table that reflects the population changes from 1980 to 2020 for Stanwood and surrounding cities.

Geography	1980	1990	2000	2010	2011	2012	2013	2014	2015	2016	2017	2018	2019
Stanwood	705	646	680	684	677	673	667	664	662	661	662	662	658
Clarence	1,001	936	1,008	974	967	960	956	957	963	968	968	974	975
Tipton	3,055	2,998	3,155	3,221	3,196	3,184	3,171	3,182	3,180	3,192	3,210	3,227	3,223
Mechanicsville	1,166	1,075	1,173	1,146	1,132	1,123	1,115	1,117	1,113	1,119	1,126	1,130	1,129
Olin	735	663	716	698	695	693	691	691	687	684	689	688	687
Lowden	717	726	794	789	779	772	770	767	765	766	770	776	773

The average household income in Stanwood is \$57,125 with a poverty rate of 4.43%. The median rental costs in recent years comes to \$772/month, and the median house value is \$97,900. The median age in Stanwood is 39.8 years according to the US Census 2019 ACS 5-Year Survey.

The earliest Sanborn fire maps made in 1915 suggest that there was a fairly robust local economy in the early 1900s. Businesses included a confectionary, various grain processing operations, specialty retail stores, and restaurants. Over history, Stanwood population has stayed relatively steady with only minor dips every couple of decades. However, most of the local businesses that were around in the early 1900's left Stanwood.



1Figure 1 Inflows and outflows of workers in Stanwood, IA Source: US Census Bureau, On the map, ACS 2019

Stanwood still has a number of local businesses including local restaurants, manufacturing, and agricultural services among others. Nationwide trends of migration towards large cities and suburbs have worked to diminish the economies of many small towns across America. As shown in Figure 1, we can see that most residents of Stanwood do not work within the city; most workers choose to commute to larger towns that may offer more jobs. Due to the Covid-

19 pandemic these trends may reverse and remote workers may look to move out of cities towards more affordable towns that offer an increased quality of life such as Stanwood.

The largest industries in Stanwood, IA are manufacturing (50 people), health care and social assistance (42 people) and educational services (39 people).

Stanwood is part of Cedar County. Stanwood is approximately 9.7 miles from Tipton, Iowa, the county seat. The community is served by U.S. Highways #30 and #38. Major cities within a 300-mile radius include Chicago, IL, (196 miles east) and Des Moines, IA, (145 miles west).

# 8.0 COMMUNITY INVOLVEMENT

With the assistance of YTT Designs and ECIA, the City is in the process of having a site reuse plan created to aid with decisions regarding future redevelopment/reuse of the site.

The City seeks to engage the community with the Broadway St cleanup project. Many methods of communication will be utilized to keep the community familiar with the status of the project. These methods will offer citizens the chance to ask questions, offer suggestions, and provide comments. The following table summarizes the community involvement activities completed to date:

Date	Description
August 2021 –	City of Stanwood worked with YTT Design and ECIA to create site reuse plan. Public
to Present	engagement/meetings held.
January 2022	City approved submission of ECIA Brownfields Revolving Loan Fund Application

January 2022	City worked with ECIA to create an electronic public repository located at					
	https://www.ecia.org/brownfields/brownfields_public_repositories/stanwood.php					
	This can also be accessed through a link on the City of Stanwood's website page.					
	(www.cityofstanwood.net)					

The following is a list of the current or planned outreach initiatives.

**Online Presence:** A webpage titled Stanwood created under ECIA's Brownfields website located at <a href="https://www.ecia.org/brownfields

**Public Notice:** The City will post a Public Notice of a 30-day comment period and public meeting on the draft Site ABCA. The notice will be published on the city website, the local newspaper and at public buildings (e.g., city office, library).

**30-Day Comment Period:** The City will hold a 30-day comment period to allow the community an opportunity to review and provide feedback on the draft Site ABCA. The draft cleanup plan and related background documents will be available at City office and on the City's website. The City will accept written comments on the ABCA and Cleanup plan and will prepare a written response to significant concerns.

**Public Meetings:** Following the comment period the City plans to host one or more public information meetings regarding the cleanup program. City representatives and/or consultants will be present to fully answer the community's questions. When applicable, public meeting announcements, including date, time, place and purpose of the public meetings will be submitted by press release to appropriate media outlets including the local newspaper.

**Project Signage:** Signage will be posted at city hall located at 209 E Broadway St to direct residents to sources of project information including City representatives and city of Stanwood website.

Meeting Notices and Email Updates: When applicable, public meeting announcements, including date, time, place, and purpose of the public meetings will be submitted by press release to appropriate media outlets, including *The Tipton Conservative*, the local daily newspaper.

Updates on the project will be posted on the ECIA website with a link accessible from the city's website and documents will be added to the information repository, such as public meeting minutes, draft remediation work plan and closure documents.

# 9.0 PROJECT SCHEDULE

The city of Stanwood seeks to abate asbestos of the structures located at 211 & 213 E Broadway St by the close of 2022. In accordance with the city's goals, the following milestones and associated schedule has been developed. The schedule is preliminary and may change based on subcontractor availability, weather conditions, and by turnaround time for review of documents by the city, regulators and other stakeholders, among other factors.

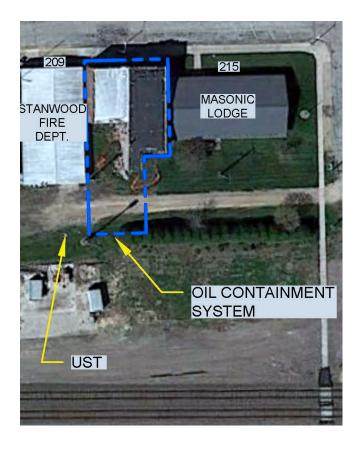
Task	Description	Start Date	End Date
1	Community Involvement Plan (CIP) draft, comment period, final	02/2022	03/31/22
2	Draft of Asbestos Abatement Plan	02/8/22	02/25/22
3	Draft of ABCA	02/25/22	03/15/22
4	Draft General Site Assurance Quality Plan	02/15/22	03/10/22
5	Bid package preparation, bid request, contractor selection	04/2022	
6	Public Notice of draft Cleanup Plan, ABCA for review and available for public comment	04/2022	
7	Public Meeting	04/2022	
8	Draft Addendum for Site Specific Assurance Quality Plan	04/2022	
9	Submit Cleanup Plan, ABCA, CIP, QAPP to EPA for review/approval, if applicable	04/2022	
10	Prepare/Submit SHPO to Iowa Historic Preservation Office	04/2022	
11	Cleanup Implementation	07/18/22	09/01/22
12	Public Outreach meeting/event	09/2022	
13	Closeout Report Completed	09/01/22	10/01/2022

# Appendix A: Site Aerial Map

=St

=Subject property





# Appendix B: Site Vicinity Map



Topographic Site Map from ARCGIS Map Server http://services.arcgisonline.com/ArcGIS/services

# Appendix C: Acronyms

AAI All Appropriate Inquiries

ABCA Analysis of Brownfields Cleanup Alternatives

BFPP Bona Fide Prospective Purchaser

BRF Brownfields Revolving Fund

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act

CPO Contiguous Property Owner

CIP Community Involvement Plan

DBE Disadvantaged Business Enterprise

EPA United States Environmental Protection Agency

ESA Environmental Site Assessment

IA DNR Iowa Department of Natural Resources

ILO Innocent Land Owner

LUST Leaking Underground Storage Tank

NPL National Priorities List

RCRA Resource Conservation and Recovery Act

USEPA United States Environmental Protection Agency

# Appendix D: Glossary

This glossary defines some terms associated with Iowa's Brownfields Cleanup Program.

#### All Appropriate Inquiries (AAI)

Steps a prospective owner must take to qualify for Bona Fide Prospective Purchaser, Contiguous Property Owner, or Innocent Landowner liability protections. A property owner must perform "all appropriate inquiry" into the previous ownership and uses of property before acquisition of the property. EPA published the Final Rule for All Appropriate Inquiries (AAI) on November 1, 2005. This rule became effective on November 1, 2006. The ASTM E1527-13 Phase I Environmental Site Assessment standard is consistent and compliant with the EPA final rule and may be used to comply with the requirements for AAI.

#### **Administrative Record**

A record of all documents (hard copies, electronic files, briefing charts, files, photographs, or other documents and records) relied upon in preparing an EPA document. The administrative record documents the proponent's consideration of all relevant and reasonable factors and should include evidence of diverging opinions and criticisms of the proposed action or its reasonable alternatives.

#### Analysis of Brownfields Cleanup Alternatives (ABCA)

An analysis of various alternative environmental cleanups for the site that meet the targeted cleanup levels.

#### **ASTM International Phase I Environmental Site Assessment**

Provides standards for conducting an environmental site assessment of a parcel of commercial real estate with respect to the range of contaminants within the scope of the Comprehensive Environmental Response Compensation and Liability Act (CERCLA) and petroleum products. Use of this practice permits a user to satisfy one of the requirements to qualify for the innocent landowner, bona fide prospective purchaser, and contiguous property owner, defenses to CERCLA liability: that is, the practices that constitute "all appropriate inquiry into the previous ownership and uses of the facility in accordance with generally accepted good commercial or customary standards and practices" as defined in 42 USC § 9601(35)(B).

#### Beneficial reuse

A use for the property that benefits the community and is the highest, best use of the property.

#### Bona Fide Prospective Purchaser (BFPP)

A CERCLA liability protection for property owners that have acquired property after January 11, 2002. The specific requirements that a landowner must meet to qualify for this liability protection is described in CERCLA § 101(40) and § 107(r).

#### **Brownfield**

Real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant. (CERCLA § 101(39)(A).)

#### **Community Involvement Plan**

Specifies the community involvement activities that the borrower plans to undertake during the cleanup.

#### Compliance

Refers to systems to comply with relevant laws and regulations.

Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Commonly known as Superfund, this law was enacted by Congress on December 11, 1980. CERCLA provides broad federal authority to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment.

#### **Contamination**

Introduction into water, air, and soil of microorganisms, chemicals, toxic substances, wastes, or wastewater in a concentration that makes the medium unfit for its next intended use. Also applies to surfaces of objects, buildings, and various household and agricultural use products.

#### Contiguous Property Owner (CPO)

A CERCLA liability protection that "protects parties that are essentially victims of pollution incidents caused by their neighbor's actions." Contiguous property owners must perform all appropriate inquiry prior to acquiring property to qualify for this protection. Persons who know, or have reason to know, prior to purchase, that the property is or could be contaminated, cannot qualify for the CPO liability protection. A landowner must meet the criteria set forth in CERCLA § 107(q) to qualify. Note that a purchaser who does not qualify as a CPO may still qualify as a bona fide prospective purchaser (BFPP).

#### Data Quality Objectives/Quality Assurance Project Plan (DQO/QAPP)

Data Quality Objectives, or DQOs are qualitative and quantitative statements that specify the quality of data required from a particular activity to support specific decisions. A Quality Assurance Project Plan, or QAPP, is a written document outlining the procedures a monitoring project will use to ensure the data it collects and analyzes meets project requirements and/or DQOs.

#### Greenfields

Greenfields (aka greenspace) are generally parkland, undeveloped open space and agricultural lands located near the outskirts of towns, cities, and larger metropolitan

areas. These areas help delineate one village, city, or town from another, or where development is occurring and where it is not. When they are protected, greenfields can serve to promote growth in already-developed areas and curb urban sprawl. As parks and greenways, they also provide the green infrastructure essential to livable communities.

#### **Exposure**

The amount of pollutant present in a given environment that represents a potential health threat to living organisms.

#### **Hazardous waste**

By-products of society that can pose a substantial or potential hazard to human health or the environment when improperly managed. Possesses at least one of four characteristics (ignitability, corrosivity, reactivity, or toxicity), or appears on special EPA lists.

#### **Information Repository**

A location where all documents related to site activities are stored and made available to the public.

#### Innocent Landowner (ILO)

A CERCLA liability protection for property owners who have performed all appropriate inquiry prior to purchase and who did not know, or have reason to know, of contamination. A person must meet the criteria set forth in CERCLA § 107(b)(3) and CERCLA § 101(35) to qualify as an innocent landowner.

#### Institutional control

A legal or administrative action or requirement imposed on a property to limit or prevent property owners or other people from coming into contact with contamination on the property. Institutional controls may be used to supplement a cleanup (by limiting contact with residual contamination), or may be used instead of conducting a cleanup.

#### Land Recycling Program (LRP)

The Land Recycling Program (LRP) allows owners or other stakeholders of a property to voluntarily assess and implement remedial actions at a site that is contaminated or is perceived to be contaminated. The assessment of the property must address the severity of the contamination problems and the risks associated with the contamination. The Department will provide a No Further Action Certificate for the site following assessment and implementation of appropriate cleanup activities and/or other remedies to assure the protection of public health and the environment. This certificate shall provide limited liability protection from further regulatory action relative to the problem(s) addressed.

#### Licensed Remediation Specialist (LRS)

An individual certified by the WVDEP to perform professional environmental services and to supervise the remediation of contaminated sites through the West Virginia Voluntary Remediation Program.

#### Resource Conservation and Recovery Act (RCRA)

This law was enacted by Congress on October 21, 1976 to address the increasing problems the nation faced from the growing volume of municipal and industrial waste. RCRA gives the U.S. EPA authority to control hazardous waste from "cradle-to-grave." This includes the generation, transportation, treatment, storage, and disposal of hazardous waste. RCRA also sets forth a framework for the management of non-hazardous solid wastes.

#### Resource Conservation and Recovery Act Corrective Action (RCRA CA)

Corrective action is a provision under the Resource Conservation and Recovery Act that requires facilities which treat, store, or dispose of hazardous wastes to investigate and clean up releases into soil, groundwater, surface water, and air. Corrective action is principally implemented through RCRA permits and orders.

#### Revolving Loan Fund (RLF)

RLF is a self-replenishing pool of money, utilizing interest and principal payments on old loans to issue new ones. RLFs are a gap-financing measure primarily used for development and expansion of small businesses.

#### Risk Evaluation and Response Action (RE/RA) plan

Qualitative and quantitative evaluation of the risk posed to human health and/or the environment by the actual or potential presence and/or use of specific pollutants and how that risk can be resolved.

#### **Standards**

Values, which represent concentrations of contaminants in groundwater and soil for which normal, unrestricted exposure is considered unlikely to pose a threat to human health.

# Appendix E: Resources

The following is a list of website links to the agencies, laws, codes, and rules mentioned throughout the document:

U.S. EPA Brownfields Program: <a href="https://www.epa.gov/brownfields">https://www.epa.gov/brownfields</a>

IA Department of Natural Resources: Land Recycling Program: <a href="https://www.iowadnr.gov/environmental-protection/land-quality/contaminated-sites/land-recycling-program-lrp">https://www.iowadnr.gov/environmental-protection/land-quality/contaminated-sites/land-recycling-program-lrp</a>

Comprehensive Environmental Response, Compensation, and Liability Act (Superfund): https://www.epa.gov/superfund/superfund-cercla-overview

Brownfields All Appropriate Inquiries: <a href="https://www.epa.gov/brownfields/brownfields-all-appropriate-inquiries">https://www.epa.gov/brownfields/brownfields-all-appropriate-inquiries</a>

CERCLA Liability and Local Government Acquisitions:

https://www.epa.gov/enforcement/guidance-superfund-liability-protections-local-government-acquisitions

Resource Conservation and Recovery Act (RCRA): <a href="https://www.epa.gov/rcra">https://www.epa.gov/rcra</a>