



**Illinois**  
**Department of Commerce**  
& Economic Opportunity  
**OFFICE OF COMMUNITY DEVELOPMENT**  
Bruce Rauner, Governor

April 26, 2017

**COPY**

Honorable Steve Draege  
County Board Chairman  
Jefferson County  
100 S. 10th Street  
Mt. Vernon, IL 62864

Re: Grant # To Be Determined – For \$629,302.00, to improve approx. 4,450 linear feet (LF) of General Tire Lane in unincorporated Mt. Vernon, Illinois by re-making the roadway into two 13 foot lanes with curb and gutter; install a stop light at its intersection with Illinois Route 142; and add a left turn lane on General Tire Lane at the intersection. The work will allow for a safer truck and worker traffic route into the nearby Continental Tire plant.

Dear Honorable Draege:

This is to inform you that the above-referenced State Community Development Block Grant (CDBG)-Economic Development (ED) applicant community has satisfied the special Grant conditions that would have been identified in its Notice of State Award Finalist (NOSAF) letter regarding environmental review requirements. All conditions regarding compliance with 24 CFR 58 have been met.

If you have any questions, please contact Mr. Kirk Kumerow at (217) 558-2842.

Sincerely,

A handwritten signature in blue ink, appearing to read "David Wortman".

David Wortman, Deputy Director  
Bureau of Community Development

Cc: Cary Minnis, GERPDC

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## DETERMINATION OF LEVEL OF CDBG ENVIRONMENTAL REVIEW

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### PART A

Grantee/Applicant Community: **Jefferson County Illinois** Grant # or Program Year: 2016 ~~Grant #~~ **TBD**

Project Name: Jefferson County Road Construction for Industrial Expansion

Project Location (City, State): Jefferson County Illinois (General Tire Lane, Mt. Vernon IL) Lat 38°17'11.85"N

Project Description Long 88°53'0.03"W

The proposed project would improve approximately 4,450 LF on General Tire Lane, currently an oil and chip surface, with two 13' lanes with curb and gutter and a stop light at the intersection of General Tire Lane and Illinois Highway 142, a left turn lane will also be added to General Tire Lane at this intersection. All components will be built to I.D.O.T specification to serve as a truck route into the nearby Continental Tire Plant. Continental will subsequently use its own funds to install additional production equipment into its plant. Grant and leverage funds from USEDPA and IDOT will also be used for project design and construction engineering and activity delivery costs.

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### PART B

The subject project has been reviewed pursuant to HUD regulations 24 CFR Part 58—*Environmental Review Procedures for Entities Assuming HUD Environmental Responsibilities*, and the following determination with respect to the project, and its component activities, is made (more than one level of review may apply, depending on project's activities):

- Exempt from NEPA review requirements per 24 CFR 58.34(a)(1)(3)(8)( )  
\*See attached Finding of Exempt Activity
- Categorically Excluded NOT Subject to §58.5 authorities per 24 CFR 58.35(b) ( ) ( ) ( )  
\*See attached Finding of Categorical Exclusion Not Subject to §58.5
- Categorically Excluded Subject to §58.5 authorities per 24 CFR 58.35(a) ( ) ( ) ( )  
\*See attached Finding of Categorical Exclusion Subject to §58.5
- An Environmental Assessment (EA) is required to be performed
- An Environmental Impact Statement (EIS) is required to be performed (*Contact DCEO ERO to confirm*)

Grantee Environmental Reviewer

Completed by (signature):



Cary Minnis, Executive Director, Greater Egypt  
Regional Planning and Development

Name, Title, Organization:

Commission

Date: 9/16/2016

**FINDING OF EXEMPT ACTIVITY [24 CFR 58.34(A)]**

- 1. Environmental and other studies, resource identification and the development of plans and strategies [58.34(a)(1)]
- 2. Information and financial services [58.34(a)(2)]
- 3. Administrative and management activities [58.34(a)(3)]
- 4. Public services that will not have a physical impact or result in any physical changes, including but not limited to services concerned with employment, crime prevention, child care, health, drug abuse, education, counseling, energy conservation and welfare or recreational needs [58.34(a)(4)]
- 5. Inspections and testing of properties for hazards or defects [58.34(a)(5)]
- 6. Purchase of insurance [58.34(a)(6)]
- 7. Purchase of tools [58.34(a)(7)]
- 8. Engineering or design costs [58.34(a)(8)]
- 9. Technical assistance and training [58.34(a)(9)]
- 10. Assistance for temporary or permanent improvements that do not alter environmental conditions and are limited to protection, repair, or restoration activities necessary only to control or arrest the effects from disasters or imminent threats to public safety including those resulting from physical deterioration [58.34(a)(10)]
- 11. Payment of principal and interest on loans made or obligations guaranteed by HUD [58.34(a)(11)]
- 12. Any of the categorical exclusions listed in §58.35(a) provided that there are no circumstances which require compliance with any other Federal laws and authorities cited in §58.5 [58.34(a)(12)]

CDBG Environmental Workflow Process (For Grantee Use)

Type of Project: PI, EPI, **ED**, DF, HR (circle one)

Grantee Name Jefferson County, Illinois

Grant #1 Pending State of Illinois CDBG-ED Grant

Grant #2

ERR Prepared By: Cary Minnis

(Printed Name)

Greater Egypt RPDC

(Organization)

Signature:



(Signature)

3/21/2017

(Date)

PROCESS/REQUIRED DOCUMENTATION

HUD LEVEL OF REVIEW INDICATED (may be more than one depending on Grant/Leverage fund activities) and associated Finding form

Determination of Level of Environmental Review form

Exempt per 28 CFR 58.34(a) ( 1 ) ( 3 ) ( 8 ) ( ) ( )

NA Categorically Excluded per 58.35 ( ) ( ) ( ) ( ) ( )

Environmental Assessment

DCEO / HUD CERTIFICATION FORMS

Date

Signature Date of CDBG Environmental Workflow Process sheet

3/21/17

Signature Date of Environmental Review for Activity/Project that is Exempt or Categorically Excluded (Not Subject to 58.5)

9/16/16

NA Signature Date of Environmental Review for Activity/Project that is Categorically Excluded (Subject to 58.5)

Does this review convert to Exempt?  Yes  No If yes, indicate date

Signature Date of Environmental Assessment – Determinations and Compliance Findings for HUD-assisted Projects

3/21/17

NOTE: All boxes and fields on all eight pages must be completed. Omissions may require re-publication.

EIGHT STEP FLOOD PLAIN (FP) REVIEW LOCAL COMMENT PERIODS

Date

Required if FEMA Firmette Indicates 100-Year Flood Plain in Project Area and not protected by an accredited levee system or flood wall. Must be completed prior to signature of either Categorical Exclusion or Environmental Assessment

Date of FP Early Warning Publication

10/15/16

Publisher's/Posting Certification

Local Comment Period (Starts one day after date of publication; lasts 15 full days)

Start Date 3/24/17

End Date 4/7/17

THEN AT LEAST ONE FULL DAY AFTER END OF FLOOD PLAIN EARLY WARNING COMMENT PERIOD

Date

Date of FP Findings Publication

11/8/16

Publisher's/Posting Certification

Local Comment Period (Starts one day after date of publication; lasts 7 full days)

Start Date 11/9/16

End Date 11/15/16

LOCAL AND STATE PUBLIC COMMENT PERIODS

Date

Date

For Categorical Exclusion (Subject to 58.5) not converting to Exempt.

NA NOI/RROF Publication/Posting (Must be at least 1 day later than CE (Subject to 58.5) Signature Date above)

NA Publisher's/Posting Certification

NA Local Comment Period Start Date (At least one day after date of publication/posting)

NA Local Comment Period End Date (Count 7 full days for publication, 10 full days for posting)

For Environmental Assessment

FONSI NOI/RROF Publication/Posting (Must be at least 1 day later than Environmental Assessment Signature Date above)

Publisher's/Posting Certification

Local Comment Period Start Date (At least one day after date of publication/posting)

3/24/17

Local Comment Period End Date (Count 15 full days for publication, 18 full days for posting)

4/7/17

Does Publication/Posting Reference Presidential-Declared Disaster/Combined Comment Period and that Funding is for Disaster Recovery Activities?  Yes  No If yes, Local/State Public Comment Period may be combined.

DATE OF RROF (i.e., 7015.15) Signature (must be at least one day after last day of local comment period)

NOTE: The (up to four) State Environmental Agency Clearance Letters are listed on the "Compliance Documentation Checklist for Categorically Excluded (subject to 58.5) or Environmental Assessment (EA)"

Please scan and email color version of completed ERR to DCEO CDBG ERO. You may mail a colored COPY – Originals will not be returned.



U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
www.hud.gov  
espanol.hud.gov

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**Environmental Review  
for Activity/Project that is Exempt or  
Categorically Excluded Not Subject to Section 58.5  
Pursuant to 24 CFR Part 58.34(a) and 58.35(b)**

**Project Information**

**Project Name:** Activity Delivery and Engineering Costs for Jefferson County Road Construction for Industrial Expansion

**Responsible Entity:** Jefferson County, Illinois

**Grant Recipient (if different than Responsible Entity):** Jefferson County, Illinois

**State/Local Identifier:** Pending State of Illinois CDBG-ED Grant

**Preparer:** Cary Minnis; Executive Director, Greater Egypt Regional Planning and Development Commission

**Certifying Officer Name and Title:** Robert White, Chairman

**Consultant (if applicable):**

**Project Location:** 100 S. 10<sup>th</sup> street, Room 106, Mt. Vernon, IL 62864

**Description of the Proposed Project [24 CFR 58.32; 40 CFR 1508.25]:** Activity delivery and engineering costs for eventual road improvement project in support of factory capacity expansion.

**Level of Environmental Review Determination:**

- Activity/Project is Exempt per 24 CFR 58.34(a): 1, 3, 8
- Activity/Project is Categorically Excluded Not Subject To §58.5 per 24 CFR 58.35(b):  
\_\_\_\_\_

**Funding Information**

Grant Number	HUD Program	Exempt Amount	Categorically Excluded Amount
Pending	State CDBG	\$120,698	NA

**Estimated Total HUD Funded Amount: \$120,698**

**This project anticipates the use of funds or assistance from another Federal agency in addition to HUD in the form of (if applicable):** Grant funding from the U.S. Economic Development Administration. Total estimated USED funding is \$223,896.50.

**Estimated Total Project Cost (HUD and non-HUD funds) [24 CFR 58.32(d)]:** \$540,991, with \$46,515 CDBG and \$ 93,030 EDA and \$ 93,030 IDOT for design engineering; \$51,683 CDBG and \$ 103,366.50 EDA and \$103,366.50 IDOT for construction engineering; and \$22,500 CDBG and \$ 27,500 EDA and \$ -0- IDOT for activity delivery costs.

**Compliance with 24 CFR §50.4 and §58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR 50.4 and 58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR §58.6</b>		
Airport Runway Clear Zones and Accident Potential Zones	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No sale or acquisition of property will occur.
24 CFR Part 51 Subpart D		
Coastal Barrier Resources	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<i>Illinois is not a covered state under these Acts.</i>
Coastal Barrier Resources Act, as		

amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]		
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	<i>The project is exempt pursuant to Section 58.6(a)(3), because it is funded through a HUD formula grant made to a state.</i>

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure

Preparer Signature:  Date: 9/16/16

Name/Title/Organization: Cary Minnis Greater Egypt Regional Planning and Development Commission

Responsible Entity Agency Official Signature:  Date: 9/16/16

Name/Title: Robert White, Chairman

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).

# Request for Release of Funds and Certification

U.S. Department of Housing and Urban Development  
Office of Community Planning and Development

OMB No. 2506-0087  
(exp. 07/31/2017)

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This form is to be used by Responsible Entities and Recipients (as defined in 24 CFR 58.2) when requesting the release of funds, and requesting the authority to use such funds, for HUD programs identified by statutes that provide for the assumption of the environmental review responsibility by units of general local government and States. Public reporting burden for this collection of information is estimated to average 36 minutes per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. This agency may not conduct or sponsor, and a person is not required to respond to, a collection of information unless that collection displays a valid OMB control number.

## Part 1. Program Description and Request for Release of Funds (to be completed by Responsible Entity)

1. Program Title(s) <b>Jefferson County, IL, CDBG Public Infrastructure for Economic Development Grant</b>	2. HUD/State Identification Number <b>TBD</b>	3. Recipient Identification Number (optional)
4. OMB Catalog Number(s)	5. Name and address of responsible entity  <b>Jefferson County, Illinois Jefferson County Courthouse 100 South 10<sup>th</sup> Street Mt. Vernon, IL 62864</b>	
6. For information about this request, contact (name & phone number) <b>Beau Henson 618.997-9351</b>	7. Name and address of recipient (if different than responsible entity)  <b>Same as responsible entity</b>	
8. HUD or State Agency and office unit to receive request  <b>IL Department of Commerce and Economic Opportunity</b>		
<b>The recipient(s) of assistance under the program(s) listed above requests the release of funds and removal of environmental grant conditions governing the use of the assistance for the following</b>		
9. Program Activity(ies)/Project Name(s) Improve an existing roadway to support an eventual major industrial development expansion at Continental Tire.	10. Location (Street address, city, county, State) <b>General Tire Lane Mt. Vernon, Jefferson County, Illinois 62864 Lat 38°17'15.93"N Long 88°52'58.33"W</b>	

### 11. Program Activity/Project Description

The proposed project would improve approximately 4,450 LF on General Tire Lane, currently an oil and chip surface, with two 13' lanes with curb and gutter and a stop light at intersection of General Tire Lane and Illinois 142. A left turn lane will also be added to General Tire Lane at this intersection. All components will be built to Illinois Department of Transportation specifications to serve as a truck route into the nearby Continental Tire Plant. Continental Tire will subsequently install additional production equipment in its plant. The total project construction costs are \$2,584,164, with \$629,302 from State CDBG; \$ 463,681 from US Economic Development Administration; \$ 150,000 from Illinois Department of Transportation (IDOT) TARP; and \$ 1,341,181 from IDOT EDP, all for road construction costs.



**Part 2. Environmental Certification (to be completed by responsible entity)**

With reference to the above Program Activity(ies)/Project(s), I, the undersigned officer of the responsible entity, certify that:

1. The responsible entity has fully carried out its responsibilities for environmental review, decision-making and action pertaining to the project(s) named above.
2. The responsible entity has assumed responsibility for and complied with and will continue to comply with, the National Environmental Policy Act of 1969, as amended, and the environmental procedures, permit requirements and statutory obligations of the laws cited in 24 CFR 58.5; and also agrees to comply with the authorities in 24 CFR 58.6 and applicable State and local laws.
3. The responsible entity has assumed responsibility for and complied with and will continue to comply with Section 106 of the National Historic Preservation Act, and its implementing regulations 36 CFR 800, including consultation with the State Historic Preservation Officer, Indian tribes and Native Hawaiian organizations, and the public.
4. After considering the type and degree of environmental effects identified by the environmental review completed for the proposed project described in Part 1 of this request, I have found that the proposal did  did not  require the preparation and dissemination of an environmental impact statement.
5. The responsible entity has disseminated and/or published in the manner prescribed by 24 CFR 58.43 and 58.55 a notice to the public in accordance with 24 CFR 58.70 and as evidenced by the attached copy (copies) or evidence of posting and mailing procedure.
6. The dates for all statutory and regulatory time periods for review, comment or other action are in compliance with procedures and requirements of 24 CFR Part 58.
7. In accordance with 24 CFR 58.71(b), the responsible entity will advise the recipient (if different from the responsible entity) of any special environmental conditions that must be adhered to in carrying out the project.


As the duly designated certifying official of the responsible entity, I also certify that:

8. I am authorized to and do consent to assume the status of Federal official under the National Environmental Policy Act of 1969 and each provision of law designated in the 24 CFR 58.5 list of NEPA-related authorities insofar as the provisions of these laws apply to the HUD responsibilities for environmental review, decision-making and action that have been assumed by the responsible entity.
9. I am authorized to and do accept, on behalf of the recipient personally, the jurisdiction of the Federal courts for the enforcement of all these responsibilities, in my capacity as certifying officer of the responsible entity.

Signature of Certifying Officer of the Responsible Entity	Title of Certifying Officer <b>Steve Draege, County Board Chairman</b>
	Date signed <b>04/08/2017</b>
Address of Certifying Officer <b>Jefferson County Courthouse, 100 South Tenth Street, Mt. Vernon, IL 62864</b>	

**Part 3. To be completed when the Recipient is not the Responsible Entity**

The recipient requests the release of funds for the programs and activities identified in Part 1 and agrees to abide by the special conditions, procedures and requirements of the environmental review and to advise the responsible entity of any proposed change in the scope of the project or any change in environmental conditions in accordance with 24 CFR 58.71(b).

Signature of Authorized Officer of the Recipient	Title of Authorized Officer
	
	Date signed

Warning: HUD will prosecute false claims and statements. Conviction may result in criminal and/or civil penalties. (18 U.S.C. 1001, 1010, 1012; 31 U.S.C. 3729, 3802)

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\*Duplicate\*

INVOICE FOR LEGAL NOTICE

Jefferson Co. Engineer/Highway Dept. No. \_\_\_\_\_

For \_\_\_\_\_ Notice \_\_\_\_\_ Time \_\_\_\_\_

MORNING SENTINEL

1808 Broadway

Mt. Vernon, Illinois 62864

In Matter of No Significant Impact

THIS LEGAL ADVERTISEMENT WAS PUBLISHED ON FOLLOWING DATES:

Month	1	2	3	4	5	6	7	8	9	10	11	12	13	14	15	16	17	18	19	20	21	22	23	24	25	26	27	28	29	30	31
Mar																							X								

DATE April 10 2017

AMOUNT DUE \$ 93.84

All Publication Fees Payable With Certificate Of Publication

Return This Portion With Your Payment

addressing. ENVIRONMENTAL CERTIFICATION Jefferson County certifies to the State of Illinois DCEO that Steve Draege, in his capacity as County Board Chairman, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. The State's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows Jefferson County to use Program funds.

dressed to Illinois Department of Commerce and Economic Opportunity at 500 East Monroe, 2nd Floor, Springfield, IL 62701. Potential objectors should contact DCEO to verify the actual last day of the objection period. STEVE DRAEGE, CHAIRMAN JEFFERSON COUNTY BOARD

CERTIFICATE OF PUBLICATION

No. \_\_\_\_\_

MT. VERNON, IL, Apr. 20 17  
 The undersigned does hereby certify that he is the publisher, or the authorized agent of the publisher, of the MORNING SENTINEL; that said newspaper is a daily secular newspaper of general circulation which has been published in the City of Mt. Vernon, in Jefferson County, State of Illinois, continuously for a period of more than one year prior to the first date of the publication attached hereto. He further certifies that said newspaper is "a newspaper" as defined in "an Act to revise the law in relation to notices" as amended by Act approved July 17, 1959 — Ill. Revised Statutes, Chap. 100, Paragraphs 1 and 5. He further certifies that the attached notice was published in said newspaper.

DATES OF PUBLICATION

The first publication being in the paper published on the day of March 23, 20 17, and the last publication being in the paper published on the day of

March 23, 20 17.

A total of 1 days.

Publication Fee \$ 93.84

(Signature)  
(Authorized Agent of Publisher)

Advance Payment Received By: \_\_\_\_\_ Date \_\_\_\_\_

NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS

Date of Notice: 03/23/2017

Name of Responsible Entity: Jefferson County, Illinois

Address: Jefferson County Courthouse, 100 South 10th Street City, State, Zip Code: Mt. Vernon, IL 62864

Telephone Number: 618-244-8000

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by Jefferson County.

REQUEST FOR RELEASE OF FUNDS

On or about 4/8/2017, Jefferson County will submit a request to the Illinois Department of Commerce and Economic Opportunity (DCEO) for the release of Com.

OBJECTIONS TO RELEASE OF FUNDS DCEO will accept objections to its release of funds and Jefferson County's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of Jefferson County (b) Jefferson County has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before

1/2

**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS**

Date of Notice: 03/23/2017

Name of Responsible Entity: Jefferson County, Illinois

Address: Jefferson County Courthouse, 100 South 10th Street City, State, Zip Code: Mt. Vernon, IL 62864

Telephone Number: 618-244-8000

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**REQUEST FOR RELEASE OF FUNDS**

On or about 4/8/2017, Jefferson County will submit a request to the Illinois Department of Commerce and Economic Opportunity (DCEO) for the release of Community Development Block Grant-Public Infrastructure funds under Title I of the Housing and Community Development Act of 1974, as amended (42 U.S.C/ 5301et seq.) to undertake a project known as Road Construction for General Tire Lane, located in the Jefferson County, at an estimated cost of \$2,584,164, with \$629,302 from State CDBG funds.

**FINDING OF NO SIGNIFICANT IMPACT**

Jefferson County has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact

**ENVIRONMENTAL CERTIFICATION**  
Jefferson County certifies to the State of Illinois DCEO that Steve Draege, in his capacity as County Board Chairman, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. The State's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows Jefferson County to use Program funds.

**OBJECTIONS TO RELEASE OF FUNDS**

DCEO will accept objections to its release of funds and Jefferson County's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of Jefferson County (b) Jefferson County has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by the State; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be ad-

partment of Commerce and Economic Opportunity at 500 East Monroe, 2nd Floor, Springfield, IL 62701. Potential objectors should contact DCEO to verify the actual last day of the objection period.  
**STEVE DRAEGE, CHAIRMAN JEFFERSON COUNTY BOARD**

\* BOTTOM of COLUMN ONE CAN BE FOUND ON PAGE 2

ment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at Jefferson County Courthouse, 100 South 10th Street, Mt. Vernon, IL 62864, which may be examined or copied Monday through Friday from 9:00 A.M. to 3:00 P.M., and at the Greater Egypt Regional Planning and Development Commission office, 3000 West DeYoung Street, Suite 800 B-3, Marion, Illinois, and may be examined or copied weekdays from 9:00 A.M. to 3:00 P.M.

**PUBLIC COMMENTS**

Any individual, group, or agency may submit written comments on the ERR to the Greater Egypt Regional Planning and Development Commission, 3000 West DeYoung Street, Suite 800 B-3, Marion, IL 62859. All comments received by 4/7/2017 will be considered by Jefferson County prior to authorizing submission of a request for release of funds. Comments should specify which Notice they are

**NOTICE OF FINDING OF NO SIGNIFICANT IMPACT AND  
NOTICE OF INTENT TO REQUEST RELEASE OF FUNDS**

Date of Notice: 03/23/2017

Name of Responsible Entity: Jefferson County, Illinois

Address: Jefferson County Courthouse, 100 South 10<sup>th</sup> Street

City, State, Zip Code: Mt. Vernon, IL 62864

Telephone Number: 618-244-8000

These notices shall satisfy two separate but related procedural requirements for activities to be undertaken by the Jefferson County.

**REQUEST FOR RELEASE OF FUNDS**

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**FINDING OF NO SIGNIFICANT IMPACT**

Jefferson County has determined that the project will have no significant impact on the human environment. Therefore, an Environmental Impact Statement under the National Environmental Policy Act of 1969 (NEPA) is not required. Additional project information is contained in the Environmental Review Record (ERR) on file at Jefferson County Courthouse, 100 South 10<sup>th</sup> Street, Mt. Vernon, IL 62864, which may be examined or copied Monday through Friday from 9:00 A.M to 3:00 P.M., and at the Greater Egypt Regional Planning and Development Commission office, 3000 West DeYoung Street, Suite 800 B-3, Marion, Illinois, and may be examined or copied weekdays from 9:00 A.M to 3:00 P.M.

**PUBLIC COMMENTS**

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## ENVIRONMENTAL CERTIFICATION

Jefferson County certifies to the State of Illinois DCEO that Steve Draege, in his capacity as County Board Chairman, consents to accept the jurisdiction of the Federal Courts if an action is brought to enforce responsibilities in relation to the environmental review process and that these responsibilities have been satisfied. The State's approval of the certification satisfies its responsibilities under NEPA and related laws and authorities and allows Jefferson County to use Program funds.

## OBJECTIONS TO RELEASE OF FUNDS

DCEO will accept objections to its release of funds and Jefferson County's certification for a period of fifteen days following the anticipated submission date or its actual receipt of the request (whichever is later) only if they are on one of the following bases: (a) the certification was not executed by the Certifying Officer of Jefferson County (b) Jefferson County has omitted a step or failed to make a decision or finding required by HUD regulations at 24 CFR part 58; (c) the grant recipient or other participants in the development process have committed funds, incurred costs or undertaken activities not authorized by 24 CFR Part 58 before approval of a release of funds by the State; or (d) another Federal agency acting pursuant to 40 CFR Part 1504 has submitted a written finding that the project is unsatisfactory from the standpoint of environmental quality. Objections must be prepared and submitted in accordance with the required procedures (24 CFR Part 58, Sec. 58.76) and shall be addressed to Illinois Department of Commerce and Economic Opportunity at 500 East Monroe, 2nd Floor, Springfield, IL 62701. Potential objectors should contact DCEO to verify the actual last day of the objection period.

Steve Draege, Chairman  
Jefferson County Board



U.S. Department of Housing and Urban  
Development  
451 Seventh Street, SW  
Washington, DC 20410  
www.hud.gov

RECEIVED APR 10 2007

espanol.hud.gov

## **Environmental Assessment Determinations and Compliance Findings for HUD-assisted Projects 24 CFR Part 58**

### **Project Information**

**Project Name:** Jefferson County Road Construction for Industrial Expansion

**Responsible Entity:** Jefferson County, Illinois

**Grant Recipient (if different than Responsible Entity):**

**State/Local Identifier:** Pending State of Illinois CDBG-ED Grant

**Preparer:** Cary Minnis, Executive Director, Greater Egypt RPDC, Marion, Illinois  
Beau Henson, Economic Development Specialist, Greater Egypt RPDC, Marion, Illinois

**Certifying Officer Name and Title:** Steve Draege, Jefferson County Chairman

**Grant Recipient (if different than Responsible Entity):**

**Consultant (if applicable):** N/A

**Direct Comments to:** Cary Minnis  
Executive Director  
Greater Egypt RPDC  
3000 West DeYoung Street, Suite 800B3  
Marion, IL 62529  
618.997.9351

**Project Location:** General Tire Lane, Unincorporated Jefferson County, IL  
Lat 38°17'11.85"N, Long 88°53'0.03"W

**Description of the Proposed Project** [24 CFR 50.12 & 58.32; 40 CFR 1508.25]:

The proposed project would improve approximately 4,450 LF on General Tire Lane, currently an oil and chip surface, with two 13' lanes with curb and gutter and a stop light at intersection of General Tire Lane and Illinois 142. A left turn lane will also be added to General Tire Lane at this intersection. All components will be built to Illinois Department of Transportation specifications to serve as a truck route into the nearby Continental Tire Plant. Continental Tire will subsequently install additional production equipment in its plant.

**Statement of Purpose and Need for the Proposal** [40 CFR 1508.9(b)]:

The project will support a major industrial expansion at Continental Tire in Mt. Vernon, Illinois. Once road construction is complete, Continental Tire has committed to invest approximately \$10,000,000 and create an additional 50 full-time positions. The roadway improvements will provide direct truck access to the tire factory, while providing the company with the ability to provide employees with a separate employee entrance. The project separates car from truck traffic, improving traffic flow, safety, and efficiency.

**Existing Conditions and Trends** [24 CFR 58.40(a)]:

Existing road condition is an oil and chip roadway, forcing truck traffic towards smaller roads in Mt. Vernon. Project will replace current roadway with a truck separated route meeting IDOT specifications.

Poor economic trends will be partially addressed with the creation of 50 high-paying jobs. The project region (based on manufacturer's worker flow) defined as Franklin, Hamilton, Jefferson, Marion, Washington, and Wayne Counties) in Illinois have a combined 24-month average unemployment rate of 6.84 which is 1.56 higher than the national average of 5.28. The region's 2014 per capita money income (5-year ACS) is \$22,769 which is 79.74% of the U.S. Jefferson County, IL has a 24-month unemployment rate of 6.83 which is 1.55 higher than the national average.



**Funding Information**

Grant Number	HUD Program	Funding Amount
	State CDBG	\$629,302

**Estimated Total HUD Funded Amount: \$629,302**

**Estimated Total Project Cost** (HUD and non-HUD funds) [24 CFR 58.32(d)]: \$2,584,164, with \$629,302 from State CDBG; \$ 463,681 from US Economic Development Administration; \$ 150,000 from Illinois Department of Transportation (IDOT) TARP; and \$ 1,341,181 from IDOT EDP, all for road construction costs.

**Compliance with 24 CFR 50.4, 58.5, and 58.6 Laws and Authorities**

Record below the compliance or conformance determinations for each statute, executive order, or regulation. Provide credible, traceable, and supportive source documentation for each authority. Where applicable, complete the necessary reviews or consultations and obtain or note applicable permits of approvals. Clearly note citations, dates/names/titles of contacts, and page references. Attach additional documentation as appropriate.

Compliance Factors: Statutes, Executive Orders, and Regulations listed at 24 CFR §58.5 and §58.6	Are formal compliance steps or mitigation required?	Compliance determinations
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 and 58.6</b>		
<b>Airport Hazards</b>  24 CFR Part 51 Subpart D	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	No sale or acquisition of property required. See attached AirNav.com map.
<b>Coastal Barrier Resources</b>  Coastal Barrier Resources Act, as amended by the Coastal Barrier Improvement Act of 1990 [16 USC 3501]	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<i>Illinois is not a covered state under these Acts</i>
<b>Flood Insurance</b>  Flood Disaster Protection Act of 1973 and National Flood	Yes No <input type="checkbox"/> <input checked="" type="checkbox"/>	<i>The project is exempt pursuant to Section 58.6(a)(3), because it is funded through a HUD formula grant made to a state</i>

Insurance Reform Act of 1994 [42 USC 4001-4128 and 42 USC 5154a]		
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 &amp; 58.5</b>		
<b>Clean Air</b>  Clean Air Act, as amended, particularly section 176(c) & (d); 40 CFR Parts 6, 51, 93	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See IEPA signoff letter 09/09/2016 and USEPA Non-Attainment areas list for IL and nationwide.
<b>Coastal Zone Management</b>  Coastal Zone Management Act, sections 307(c) & (d)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	N/A, see Illinois Coastal Zone Map. Mt. Vernon is 276 miles from nearest shore of Lake Michigan.
<b>Contamination and Toxic Substances</b>  24 CFR Part 50.3(i) & 58.5(i)(2)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See attached USEPA Envirofacts search results. The Continental Tire Plant has an AFS status of "In Compliance" and no apparent open violations.
<b>Endangered Species</b>  Endangered Species Act of 1973, particularly section 7; 50 CFR Part 402	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See 10/4/2016 IDNR signoff and 09/01/2016 EcoCat and USFW list. There is no tree clearing associated with this project, so the three listed endangered species will not be affected.
<b>Explosive and Flammable Hazards</b>  24 CFR Part 51 Subpart C	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See attached USEPA EnviroFacts search above and HUD Explosive and Flammable Hazards Worksheet.
<b>Farmlands Protection</b>  Farmland Protection Policy Act of 1981, particularly sections 1504(b) and 1541; 7 CFR Part 658	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Please see 09/07/2016 IL Dept of Ag sign- off letter. No farmland will be converted by this project. See attached USDA web soil survey (WSS) search result.
<b>Floodplain Management</b>  Executive Order 11988, particularly section 2(a); 24 CFR Part 55	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	8-Step Floodplain Review is done (see map and review – FEMA Firmette attached. Will develop a stormwater pollution prevention plan for strict control of erosion and sediment prior to start of road construction.
<b>Historic Preservation</b>  National Historic Preservation Act of 1966, particularly sections 106 and 110; 36 CFR Part 800	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	09/21/2016 IHPA sign-off letter and Section 106 Tribal Consultation checklist; and three tribal consultation letters emailed 9/27/2016. No tribal response.
<b>Noise Abatement and Control</b>	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	The project does not involve housing construction or rehabilitation.

Noise Control Act of 1972, as amended by the Quiet Communities Act of 1978; 24 CFR Part 51 Subpart B		
<b>Sole Source Aquifers</b>  Safe Drinking Water Act of 1974, as amended, particularly section 1424(e); 40 CFR Part 149	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Not near Designated Sole Source Aquifer. Please see attached map.
<b>Wetlands Protection</b>  Executive Order 11990, particularly sections 2 and 5	Yes <input checked="" type="checkbox"/> No <input type="checkbox"/>	See 10/04/2016 IDNR sign off. Strict adherence to best management practices for erosion and sedimentation control shall be utilized. Not in wetland on USFWS National Wetland map.
<b>Wild and Scenic Rivers</b>  Wild and Scenic Rivers Act of 1968, particularly section 7(b) and (c)	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	Not near Designated Wild and Scenic River. Please see attached map.
<b>ENVIRONMENTAL JUSTICE</b>		
<b>Environmental Justice</b>  Executive Order 12898	Yes <input type="checkbox"/> No <input checked="" type="checkbox"/>	See attached USEPA EJ View search results

**Environmental Assessment Factors** [24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Recorded below is the qualitative and quantitative significance of the effects of the proposal on the character, features and resources of the project area. Each factor has been evaluated and documented, as appropriate and in proportion to its relevance to the proposed action. Verifiable source documentation has been provided and described in support of each determination, as appropriate. Credible, traceable and supportive source documentation for each authority has been provided. Where applicable, the necessary reviews or consultations have been completed and applicable permits of approvals have been obtained or noted. Citations, dates/names/titles of contacts, and page references are clear. Additional documentation is attached, as appropriate. **All conditions, attenuation or mitigation measures have been clearly identified.**

**Impact Codes:** Use an impact code from the following list to make the determination of impact for each factor.

- (1) Minor beneficial impact
- (2) No impact anticipated
- (3) Minor Adverse Impact – May require mitigation
- (4) Significant or potentially significant impact requiring avoidance or modification which may require an Environmental Impact Statement

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>LAND DEVELOPMENT</b>		
Conformance with Plans / Compatible Land Use and Zoning / Scale and Urban Design	2	Project site use is consistent with industrial zoning, as described in Mt. Vernon 2009 Comprehensive Plan Five Year Review dated 12.10.2014.
Soil Suitability/ Slope/ Erosion/ Drainage/ Storm Water Runoff	2	Existing soil conditions are suitable for project construction (Source: Round Table Design PER, USDA Soil Survey). An erosion control plan will be established during construction of project and after. Vertical alignment of the road will be designed as close as possible to existing alignment. (Source: Round Table Design PER). Also IDOA sign-off 9/7/16 and IEPA sign-off 9/9/2016. NPDES permit to be required.
Hazards and Nuisances including Site Safety and Noise	2	During construction, routine traffic control will be done as required, as well as OSHA requirements are to be met. No housing activities are included in the project. EnviroFacts identified industrial technology, directly supported by the project. Source: Round Table Design PER, EPA EnviroFacts
Energy Consumption	2	During construction, temporary activities will require energy consumption. Industrial expansion utilizes an existing structure. Source: Round Table Design PER

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>SOCIOECONOMIC</b>		
Employment and Income Patterns	1	The project will aid in developing appropriate and functioning infrastructure in an industrial area. High paying job creation will lower unemployment and raise per capita income. Sources: US Census, Round Table Design PER, Greater Egypt CEDS.
Demographic Character Changes, Displacement	1	The project will aid in developing appropriate and functioning infrastructure in an industrial area. High paying job creation will lower unemployment and per capita income. No displacement of people. Sources: US Census, Round Table Design PER, Greater Egypt CEDS.

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>COMMUNITY FACILITIES AND SERVICES</b>		

Educational and Cultural Facilities	2	No educational or cultural facilities within project area. Source: Round Table Design PER, Project Location Maps, IHPA sign-off letter 9/21/16
Commercial Facilities	2	No commercial activity present in project area. Source: Round Table Design PER, Project Location Maps
Health Care and Social Services	1	No direct healthcare or social services in the project area. Traffic safety and accessibility shall be increased. Addition of industrial jobs may lead to lower utilization of social services. Source: Round Table Design PER, Project Location Maps, EJ Report
Solid Waste Disposal / Recycling	2	There are no landfills within the county. Two landfills are available in surrounding counties. Solid waste production will be minimized during construction. Source: Round Table Design PER , IEPA sign-off 9/9/16
Waste Water / Sanitary Sewers	2	Project will comply with IEPA waste separation requirements and requires a NPDES permit. Source: Round Table Design PER
Water Supply	2	No anticipated impact. Project is for road construction only.
Public Safety - Police, Fire and Emergency Medical	1	Police and Emergency operations are not expected to be impacted by the project. Roadway portion of project creates a more controlled traffic pattern, additional access to industrial properties/workplaces, and will meet IDOT requirements. Water extension shall ensures local water supply. Source: Round Table Design PER
Parks, Open Space and Recreation	2	No designated park or open space near project area. Source: Round Table Design PER, Project Location Maps
Transportation and Accessibility	1	Transportation impact will be minimized during construction. Roadway portion of project creates a more controlled traffic pattern, additional access to industrial properties/workplaces, and will meet IDOT requirements. Source: Round Table Design PER, Project Location Maps

Environmental Assessment Factor	Impact Code	Impact Evaluation
<b>NATURAL FEATURES</b>		
Unique Natural Features, Water Resources	2	IEPA sign-off 9/9/16, IDOA sign-off 9/7/16, IDNR sign-off 10/4/16. EcoCat found no record of State-listed threatened or endangered species. USFWS list for Jefferson County found three species, none likely to be encountered during project. No tree-clearing involved in project.

Vegetation, Wildlife	2	IDNR sign-off 10/4/16 calls for strict adherence for best management practices for erosion and sediment control
Other Factors	2	IDNR sign-off 10/4/16 calls for strict adherence for best management practices for erosion and sediment control. 8-Step floodplain assessment

**Additional Studies Performed:** General Tire Lane Improvements: Water Main Extension, Roadway, and Stormwater Preliminary Engineering Report (PER), prepared by Round Table Design for Jefferson County, IL and City of Mt. Vernon, IL. Published 12/16/16.

**Field Inspection** (Date and completed by): Not yet completed.

**List of Sources, Agencies and Persons Consulted** [40 CFR 1508.9(b)]:

1) General Tire Lane Improvements: Water Main Extension, Roadway, and Stormwater Preliminary Engineering Report (PER), prepared by Round Table Design for Jefferson County, IL and City of Mt. Vernon, IL. Published 12/16/16. 2) Jefferson county engineering 3) IEPA 4) IDNR 5) FWS 6) IHPA 7) Dept of Agriculture 8) DCEO 9) Tribal assessment 10) Mt. Vernon 2009 Comprehensive Plan Five Year Review dated 12.10.2014.

**List of Permits Obtained:** None obtained. Anticipated permits include;

- IEPA – NPDES PERMIT (INCLUDES NOI & NOT)
    - TIMELINE – 1 MONTH APPROVAL
    - NEEDED FOR WORK THAT DISTURBS MORE THAN 1 ACRE OF SOIL.
    - SUBMITTED AFTER FINAL PLANS ARE COMPLETE AND BEFORE CONSTRUCTION BEGINS.
- WILL NOT AFFECT THE OVERALL SCHEDULE

**Public Outreach** [24 CFR 50.23 & 58.43]:

Tribal Consultation with three listed tribes completed. 15-Day Notice of Finding of No Significant Impact and Notice of Intent to Request Release of Funds public comment period anticipated to be begin March 24, 2017, which is one day after March 23, 2017 publication date.

Two newspaper publications for an 8-Step Flood Plain Review were respectfully published on 10/15/2016 and 11/8/2016; and the two resulting local public comment periods

ran from 10/16/2016 to 10/30/2016 and from 11/09/2016 to 11/15/2016.

**Cumulative Impact Analysis [24 CFR 58.32]:**

Project is to be completed on footprint of previously disturbed land where current oil-and-chip roadway is located. Project is located out of floodplain and adjacent to wetland. Strict adherence to best management practices for erosion and sedimentation control shall be utilized. Roadway portion of project creates a more controlled traffic pattern, additional access to industrial properties/workplaces, and will meet IDOT requirements. The existing water system supplying the current industrial area was constructed over 50 years ago and has reached the end of useful life. The proposed water main extension provides relief for the aging system and will allow current and future industrial continued access to water.

**Alternatives [24 CFR 58.40(e); 40 CFR 1508.9]**

Relocation of road to west: does not decrease amount of wetland mitigation and adds costs. Alternative rejected.

**No Action Alternative [24 CFR 58.40(e)]:**

No action alternative rejected as no action fails to meet needs of local Continental Tire plant to add additional production equipment.

**Summary of Findings and Conclusions:**

After review of the environmental assessment, it has been determined that the best action is to proceed with the project as proposed, using construction methods that offer minimum impact. Strict adherence to best management practices for erosion and sedimentation control shall be utilized. Completion of project expected to positively impact traffic patterns, vehicle safety, upgrade aging water infrastructure, and increase availability of high-wage jobs.

**Mitigation Measures and Conditions [40 CFR 1505.2(c)]**

Summarize below all mitigation measures adopted by the Responsible Entity to reduce, avoid, or eliminate adverse environmental impacts and to avoid non-compliance or non-conformance with the above-listed authorities and factors. These measures/conditions must be incorporated into project contracts, development agreements, and other relevant documents. The staff responsible for implementing and monitoring mitigation measures should be clearly identified in the mitigation plan.

Law, Authority, or Factor	Mitigation Measure
Farmlands Protection	Contact IDOA if additional right-of-way is required
Wetlands Protection	Adhere to best management practices for erosion and sediment control required
Historic Preservation	Notify law enforcement if human remains discovered during construction
Floodplain Management	Develop a stormwater prevention plan for street control of erosion and sediments

**Determination:**

- Finding of No Significant Impact** [24 CFR 58.40(g)(1); 40 CFR 1508.27]  
The project will not result in a significant impact on the quality of the human environment.
- Finding of Significant Impact** [24 CFR 58.40(g)(2); 40 CFR 1508.27]  
The project may significantly affect the quality of the human environment.

Preparer Signature:  Date: 3.21.17

Name/Title/Organization: Cary Minnis, Executive Director, Greater Egypt Regional Planning and Development Commission

Certifying Officer Signature:  Date: 3.21.17

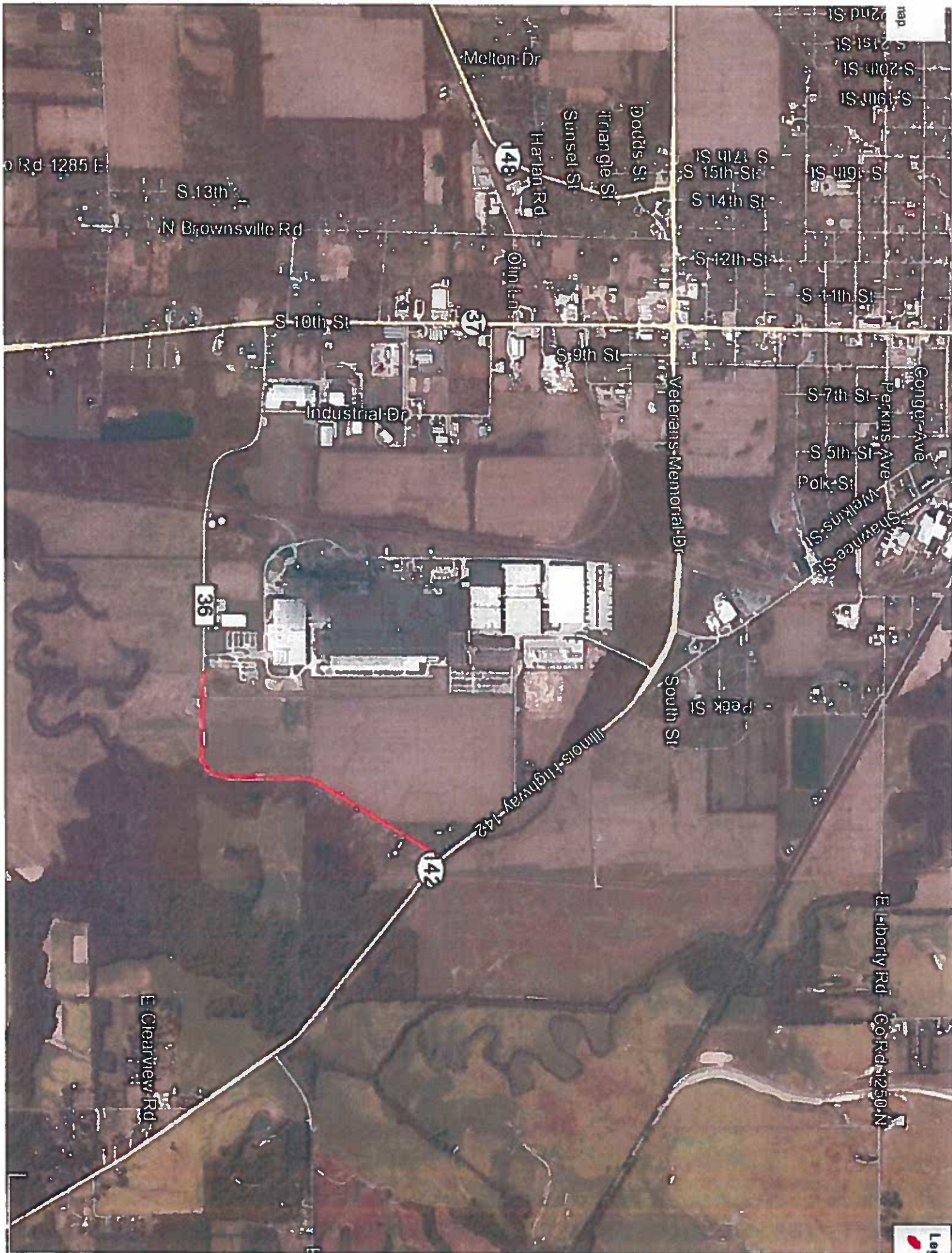
Name/Title: Steve Draege, Jefferson County, IL Chairman

This original, signed document and related supporting material must be retained on file by the Responsible Entity in an Environmental Review Record (ERR) for the activity/project (ref: 24 CFR Part 58.38) and in accordance with recordkeeping requirements for the HUD program(s).



**Compliance Documentation Checklist for Categorically Excluded (Subject to 58.5) or Environmental Assessment (EA)**

<b>Grantee</b>		Jefferson County, IL	<b>Grant # TBD</b>
<b>Compliance Documentation Items and Explanations – Please place items behind completed HUD Environmental Review document for the Categorical Exclusion (subject to 58.5) or the HUD Environmental Assessment (EA), in the order they are listed in either of those documents.</b>			
<b>YES</b>	<b>NO</b>	<b>DOCUMENTATION</b>	
X		Project Location Map	
X		Project Summary (may use application's Project Summary. Must include additional description found at: <a href="https://www.hudexchange.info/environmental-review/orientation-to-environmental-reviews/">https://www.hudexchange.info/environmental-review/orientation-to-environmental-reviews/</a> )	
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 AND 58.6</b>			
<b>Airport Clear Zones and Accident Potential Zones</b>			
X		Airport database search results of project area	
<b>Coastal Barrier Resources</b>			
		Illinois is not covered by this Federal body of Law	
<b>Flood Insurance</b>			
		HUD/HEROS – Flood Insurance (CEST and EA) Worksheet – Not required for funding from HUD formula grant made to a state (e.g., State of IL CDBG).	
<b>STATUTES, EXECUTIVE ORDERS, AND REGULATIONS LISTED AT 24 CFR 50.4 AND 58.5</b>			
<b>Clean Air Act</b>			
X		IEPA clearance letter;	
X		US EPA Illinois (by County by Year) Non-Attainment Status list; and	
X		National Non-Attainment Status list.	
<b>Coastal Zone Management Act</b>			
X		Illinois Coastal Zone Boundaries Map with Grantee's location marked on Illinois inset map to show approximate distance from coastal zone in NE Illinois.	
<b>Contamination and Toxic Substances</b>			
X		Completed US EPA Envirofacts documentation of project area	
X		HUD – Contamination and Toxic Substances (Single Family Properties) Worksheet (CDBG HR Tier 2 Reviews Only) <i>OR If Non-Residential property is being acquired or developed by a CDBG ED or RLF project, complete:</i>	
	X	HUD – Contamination and Toxic Substances (Multi-Family and Non-Residential Properties) Worksheet	
	X	Completed US EPA Envirofacts documentation of project area	
	X	Phase I ASTM Survey by a licensed professional.	
<b>Endangered Species Act</b>			
X		IL DNR EcoCat Endangered Species Release from Consultation	
<b>Explosive and Flammable Hazards</b>			
X		Completed US EPA Envirofacts documentation of project area	
X		HUD – Explosive and Flammable Hazards (CEST and EA) Worksheet (For ED/RLF Projects Only)	
<b>Farmland Protection Policy Act</b>			
X		IDOA Clearance Letter	
<b>Floodplain Management</b>			
X		FEMA Firmette with Project Location clearly marked	
X		HUD – Floodplain Management (CEST and EA) Worksheet	
X		Completed 8-Step Floodplain Review Document (if applicable). Include both publications and publisher's certificates and any comments received. No project activities in a Floodway, unless a DCEO pre-approved functionally-dependent use.	
<b>Historic Preservation</b>			
X		IL Historic Preservation Agency Section 106 Clearance Letter	
X		HUD – Section 106 Tribal Consultation Checklist	
		If required, Tribal Consultation Documentation:	
X		HUD TDAT tribal contact page listing tribes interested in project's county/counties or indicates that no tribes are interested in said county(ies).	
X		Copies of letter(s) signed by Grantee's chief elected official, on Grantee letterhead, addressed to tribal official(s) listed on TDAT;	
X		Fax or e-mail confirmation sheets;	
X		Allow 35 full days if mailed, 30 full days if e-mailed or faxed	
<b>Noise Abatement and Control</b>			
X		PI, EPI, DF, ED or RLF Projects: A statement on the CEST or EA Env. Rev. form that the project does not involve housing construction or rehabilitation.	
X		HUD – Noise Abatement and Control CEST Level Review Worksheet (for CDBG HR Tier 2 Reviews Only)	
<b>Sole Source Aquifers</b>			
X		US EPA Region 5 Sole Source Aquifers Map with Grantee's location marked in relation to the Mahomet Sole Source Aquifer in Central Illinois.	
	X	Note: If community is near or in that designated aquifer, then a copy of the US EPA Mahomet Sole Source Aquifer Project Review Area map must also be included, with community's location marked.	
	X	If any portion of project is in the designated aquifer, then also attach completed US EPA Region 5 clearance documentation.	
<b>Wetland Protection</b>			
X		IL DNR EcoCat Wetlands Release from Consultation	
<b>Wild and Scenic Rivers Act</b>			
X		Illinois Wild and Scenic Rivers Map with Grantee's location marked on Illinois inset map in relation to the Middle Fork Vermilion River, near Danville.	
<b>ENVIRONMENTAL JUSTICE</b>			
<b>Environmental Justice</b>			
X		Completed US EPA EJScreen documentation of project location.	



Co Rd 1285 E

S 13th St

N Brownsville Rd

S 10th St

Industrial Dr

36

142

Illinois Highway 142

Melton Dr

Harlan Rd

Sunset St

Dadds St

Triangle St

S 17th St

S 15th St

S 14th St

S 12th St

S 11th St

S 9th St

S 7th St

S 5th St

Polk St

Shawnee St

Weikens St

Perkins Ave

Conger Ave

Veterans Memorial Dr

South St

Peek St

E Liberty Rd

Co Rd 1250 N

E Clearview Rd





### **PROJECT DESCRIPTION:**

The improvements proposed in this project are essential to the growth of current industries in Mt. Vernon, Illinois. The road improvement will connect an existing truck route, Woodland Drive, running from State Rt 37 to Continental Tire's south receiving entrance, with State Rt 142. It will provide access to a new employee parking lot and give shipping and receiving deliveries access to either State Highway. The new employee parking lot will provide access for employees to the proposed Continental Tire plant expansion on the south side of the existing facility. This road improvement will also serve the businesses of the Fountain Place Industrial Park located north of Woodland Drive and east of State Rt 37. The extension of the truck route along General Tire Lane will allow access to State Rt 142 for employees and deliveries from the Industrial Park. The water main extension will provide additional water to this growing industrial area, while providing relief from the existing water main to better serve the public.

The road improvements will upgrade the existing oil and chip surface of General Tire Lane with a 26' concrete pavement and curb and gutters to match the existing Woodland Drive surface. The pavement and all appertenances will be designed to the Illinois Department of Transportation "Truck Access Route Program" standards. A left turn lane and traffic signals will be added at the intersection of State Rt 142 to control traffic turning onto the state highway at shift changes.

The water main extension will consist of a 10 inch water main from the existing 10 inch water main on Woodland Drive to the existing 12 inch water main serving Continental Tire. Continental Tire recently purchased the trucking facility on its southern border and is in the process of moving a re-tread machine back from Mexico for operation in the newly acquired facility. The new water main will be located immediately west of the new facility.

### **PROJECT MAGNITUDE:**





The proposed project will greatly improve access to allow the current industries to ship and receive goods more efficiently, along with improving water service for the area. Following is a brief summary of the scale of the improvements.

- The road improvement consists of 4,450 lineal feet of 26 foot wide roadway with curbs and gutter.
- The installation of culverts and storm sewer for proper drainage and protection of the proposed roadway.
- Entrances for Commercial and Industrial access.
- Signalized intersection at State Rt. 142.
- 2,800 feet of new 10 inch water main, hydrants and appurtenances.

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## Airport Search Results

### 4 airports found near **CROSSROADS COMMUNITY HOSPITAL HELIPORT**

ID	CITY	AIRPORT NAME	WHERE
 MVN	MOUNT VERNON, IL	MOUNT VERNON AIRPORT	3.7 nm E
 ENL	CENTRALIA, IL	CENTRALIA MUNICIPAL AIRPORT	14.2 nm NNW
 H96	BENTON, IL	BENTON MUNICIPAL AIRPORT	18.2 nm S
 SLO	SALEM, IL	SALEM-LECKRONE AIRPORT	19.9 nm N

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# ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

BRUCE RAUNER, GOVERNOR

ALEC MESSINA, ACTING DIRECTOR

September 9, 2016

Greater Egypt Regional Planning & Development Commission  
3000 West DeYoung St., Suite 800B-3  
Marion, IL 62959

RE: Jefferson County – Improve Roadway to Industrial Plant

Dear Sir or Madam:

The Agency has no objections to the proposed roadway project, however, a construction site activity stormwater NPDES permit will be required for this project. Also, please be advised that any solid or hazardous waste must be properly disposed of or recycled.

Sincerely,

A handwritten signature in cursive script that reads "Alec Messina".

Alec Messina  
Acting Director

RECEIVED

SEP 14 2016

Greater Egypt Regional Planning  
and Development Commission

4302 N. Main St., Rockford, IL 61103 (815) 987-7760  
595 S. State, Dgln, IL 60123 847/608-3131  
2125 S. First St., Champaign, IL 61820 (217) 278-5800  
2009 Mall St., Collinsville, IL 62234 (618) 346-5120

9511 Harrison St., Des Plaines, IL 60016 847/294-4000  
412 SW Washington St., Suite D, Peoria, IL 61602 309 671-3022  
2309 W. Main St., Suite 116, Marion, IL 62959 (618) 993-7200  
100 W. Randolph, Suite 10-300, Chicago, IL 60601



# Green Book Illinois Nonattainment/Maintenance Status for Each County by Year for All Criteria Pollutants

As of September 22, 2016

The 8-hour Ozone (1997) standard was revoked on April 6, 2015 and the 1-hour Ozone (1979) standard was revoked on June 15, 2005.

Listed by County, NAAQS, then Area

Select a State: [AK](#) | [AL](#) | [AR](#) | [AZ](#) | [CA](#) | [CO](#) | [CT](#) | [DC](#) | [DE](#) | [FL](#) | [GA](#) | [GU](#) | [IA](#) | [ID](#) | [IL](#) | [IN](#) | [KS](#) | [KY](#) | [LA](#) | [MA](#) | [MD](#) | [ME](#) | [MI](#) | [MN](#) | [MO](#) | [MS](#) | [MT](#) | [NC](#) | [NE](#) | [NH](#) | [NJ](#) | [NM](#) | [NV](#) | [NY](#) | [OH](#) | [OR](#) | [PA](#) | [PR](#) | [RI](#) | [SC](#) | [TN](#) | [TX](#) | [UT](#) | [VA](#) | [WA](#) | [WI](#) | [WV](#) | [WY](#)

**Important Notes**

County	NAAQS	Area Name	Nonattainment in Year	Redesignation to Maintenance	Classification	Whole or Part County	Population (2010)	State/County FIPS Codes
IL-INDOIS								
Cook Co	1-Hour Ozone (1979)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	92 93 94 95 96 97 98 99 00 01 02 03 04	//	Severe 17	Whole	5,194,675	17/031
Cook Co	8-Hour Ozone (1997)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	04 05 06 07 08 09 10 11	08/13/2012	Moderate	Whole	5,194,675	17/031
Cook Co	8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI	12 13 14 15 16	//	Moderate	Whole	5,194,675	17/031
Cook Co	Lead (2008)	Chicago, IL	11 12 13 14 15 16	//		Part	35,696	17/031
Cook Co	PM-10 (1987)	Southeast Chicago, IL	92 93 94 95 96 97 98 99 00 01 02 03 04	11/21/2005	Moderate	Part	3,117	17/031
Cook Co	PM-10 (1987)	Lyons Twsp., IL	92 93 94 95 96 97 98 99 00 01 02 03 04	11/21/2005	Moderate	Part	111,688	17/031
Cook Co	PM-2.5 (1997)	Chicago-Gary-Lake County, IL-IN	05 06 07 08 09 10 11 12	10/02/2013	Former Subpart 1	Whole	5,194,675	17/031
Cook Co	Sulfur Dioxide (2010)	Lemont, IL	13 14 15 16	//		Part	21,113	17/031
Du Page Co	1-Hour Ozone (1979)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	92 93 94 95 96 97 98 99 00 01 02 03 04	//	Severe 17	Whole	916,924	17/043
Du Page Co	8-Hour Ozone (1997)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	04 05 06 07 08 09 10 11	08/13/2012	Moderate	Whole	916,924	17/043
Du Page Co	8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI	12 13 14 15 16	//	Moderate	Whole	916,924	17/043
Du Page Co	PM-2.5 (1997)	Chicago-Gary-Lake County, IL-IN	05 06 07 08 09 10 11 12	10/02/2013	Former Subpart 1	Whole	916,924	17/043
Grundy Co	1-Hour Ozone (1979)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	92 93 94 95 96 97 98 99 00 01 02 03 04	//	Severe 17	Part	14,735	17/063
Grundy Co	8-Hour Ozone (1997)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	04 05 06 07 08 09 10 11	08/13/2012	Moderate	Part	20,519	17/063
Grundy Co	8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI	12 13 14 15 16	//	Moderate	Part	20,519	17/063
Grundy Co	PM-2.5 (1997)	Chicago-Gary-Lake County, IL-IN	05 06 07 08 09 10 11 12	10/02/2013	Former Subpart 1	Part	20,519	17/063
Jersey Co	1-Hour Ozone (1979)-NAAQS revoked	Jersey Co, IL	92 93 94	04/13/1995	Marginal	Whole	22,985	17/083

County	NAAQS	Area Name	Nonattainment In Year													Redesignation to Maintenance	Classification	Whole or Part County	Population (2010)	State/County FIPS Codes	
			04	05	06	07	08	09	10	11											
Jersey Co	8-Hour Ozone (1997)-NAAQS revoked	St. Louis, MO-IL															06/12/2012	Moderate	Whole	22,985	17/083
Kane Co	1-Hour Ozone (1979)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	92	93	94	95	96	97	98	99	00	01	02	03	04		//	Severe 17	Whole	515,269	17/089
Kane Co	8-Hour Ozone (1997)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN															08/13/2012	Moderate	Whole	515,269	17/089
Kane Co	8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI										12	13	14	15	16	//	Moderate	Whole	515,269	17/089
Kane Co	PM-2.5 (1997)	Chicago-Gary-Lake County, IL-IN															10/02/2013	Former Subpart 1	Whole	515,269	17/089
Kendall Co	1-Hour Ozone (1979)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	92	93	94	95	96	97	98	99	00	01	02	03	04		//	Severe 17	Part	30,355	17/093
Kendall Co	8-Hour Ozone (1997)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN															08/13/2012	Moderate	Part	52,377	17/093
Kendall Co	8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI										12	13	14	15	16	//	Moderate	Part	52,377	17/093
Kendall Co	PM-2.5 (1997)	Chicago-Gary-Lake County, IL-IN															10/02/2013	Former Subpart 1	Part	52,377	17/093
La Salle Co	PM-10 (1987)	Oglesby, IL	92	93	94	95											10/07/1996	Moderate	Part	3,662	17/099
Lake Co	1-Hour Ozone (1979)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	92	93	94	95	96	97	98	99	00	01	02	03	04		//	Severe 17	Whole	703,462	17/097
Lake Co	8-Hour Ozone (1997)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN															08/13/2012	Moderate	Whole	703,462	17/097
Lake Co	8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI										12	13	14	15	16	//	Moderate	Whole	703,462	17/097
Lake Co	PM-2.5 (1997)	Chicago-Gary-Lake County, IL-IN															10/02/2013	Former Subpart 1	Whole	703,462	17/097
Madison Co	1-Hour Ozone (1979)-NAAQS revoked	St. Louis, MO-IL	92	93	94	95	96	97	98	99	00	01	02				05/12/2003	Serious	Whole	269,262	17/119
Madison Co	8-Hour Ozone (1997)-NAAQS revoked	St. Louis, MO-IL															06/12/2012	Moderate	Whole	269,262	17/119
Madison Co	8-Hour Ozone (2008)	St. Louis-St. Charles-Farmington, MO-IL															//	Marginal	Whole	269,262	17/119
Madison Co	Lead (2008)	Granite City, IL															//		Part	36,901	17/119
Madison Co	PM-10 (1987)	Granite City, Nameoh Twsp, IL	92	93	94	95	96	97									05/11/1998	Moderate	Part	35,652	17/119
Madison Co	PM-2.5 (1997)	St. Louis, MO-IL															//	Moderate	Whole	269,262	17/119
Madison Co	Sulfur Dioxide (2010)	Alton Township, IL															//		Part	0	17/119

County	NAAQS	Area Name	Nonattainment in Year												Redesignation to Maintenance	Classification	Whole or Part County	Population (2010)	State/County FIPS Codes																					
			92	93	94	95	96	97	98	99	00	01	02	03						04																				
Mc Henry Co	1-Hour Ozone (1979)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN														//	Severe 17	Whole	308,760	17/111																				
Mc Henry Co	8-Hour Ozone (1997)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN									04	05	06	07	08	09	10	11			08/13/2012	Moderate	Whole	308,760	17/111															
Mc Henry Co	8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI											12	13	14	15	16				//	Moderate	Whole	308,760	17/111															
Mc Henry Co	PM-2.5 (1997)	Chicago-Gary-Lake County, IL-IN																	05	06	07	08	09	10	11	12			10/02/2013	Former Subpart 1	Whole	308,760	17/111							
Monroe Co	1-Hour Ozone (1979)-NAAQS revoked	St. Louis, MO-IL	92	93	94	95	96	97	98	99	00	01	02																		05/12/2003	Serious	Whole	32,957	17/133					
Monroe Co	8-Hour Ozone (1997)-NAAQS revoked	St. Louis, MO-IL																														06/12/2012	Moderate	Whole	32,957	17/133				
Monroe Co	8-Hour Ozone (2008)	St. Louis-St. Charles-Farmington, MO-IL																														//	Marginal	Whole	32,957	17/133				
Monroe Co	PM-2.5 (1997)	St. Louis, MO-IL																														//	Moderate	Whole	32,957	17/133				
Peoria Co	Sulfur Dioxide (1971)	Holt Township, IL	92	93	94																												08/05/1995	Part	2,032	17/143				
Peoria Co	Sulfur Dioxide (1971)	Peoria, IL	92	93	94																													08/05/1995	Part	127,507	17/143			
Peoria Co	Sulfur Dioxide (2010)	Pekin, IL																															//		Part	1,881	17/143			
Randolph Co	PM-2.5 (1997)	St. Louis, MO-IL																															//	Moderate	Part	1,453	17/157			
St Clair Co	1-Hour Ozone (1979)-NAAQS revoked	St. Louis, MO-IL	92	93	94	95	96	97	98	99	00	01	02																					05/12/2003	Serious	Whole	270,056	17/163		
St Clair Co	8-Hour Ozone (1997)-NAAQS revoked	St. Louis, MO-IL																																	06/12/2012	Moderate	Whole	270,056	17/163	
St Clair Co	8-Hour Ozone (2008)	St. Louis-St. Charles-Farmington, MO-IL																																//	Marginal	Whole	270,056	17/163		
St Clair Co	PM-2.5 (1997)	St. Louis, MO-IL																																//	Moderate	Whole	270,056	17/163		
Tazewell Co	Sulfur Dioxide (1971)	Groveland Township (Tazewell County), IL	92	93	94																														08/05/1995	Part	22,991	17/179		
Tazewell Co	Sulfur Dioxide (2010)	Pekin, IL																																	//		Part	39,313	17/179	
Will Co	1-Hour Ozone (1979)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN	92	93	94	95	96	97	98	99	00	01	02	03	04																				//	Severe 17	Whole	677,560	17/197	
Will Co	8-Hour Ozone (1997)-NAAQS revoked	Chicago-Gary-Lake County, IL-IN																																		08/13/2012	Moderate	Whole	677,560	17/197
Will Co	8-Hour Ozone (2008)	Chicago-Naperville, IL-IN-WI																																	//	Moderate	Whole	677,560	17/197	



County	NAAQS	Area Name	Nonattainment In Year													Redesignation to Maintenance	Classification	Whole or Part County	Population (2010)	State/County FIPS Codes		
			05	06	07	08	09	10	11	12	13	14	15	16								
Will Co	PM-2.5 (1997)	Chicago-Gary-Lake County, IL-IN																10/02/2013	Former Subpart 1	Whole	677,560	17/197
Will Co	Sulfur Dioxide (2010)	Lemont, IL																//		Part	147,803	17/197
Williamson Co	Sulfur Dioxide (2010)	Williamson County, IL																//		Whole	68,357	17/199

Important Notes

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# Green Book Summary Nonattainment Area Population Exposure Report

As of September 22, 2016

Ordered by state code(s)

The NO<sub>2</sub> nonattainment area became a maintenance area on September 22, 1998.

All Carbon Monoxide areas were redesignated to maintenance areas as of September 27, 2010.

The 8-hour Ozone (1997) standard was revoked on April 6, 2015 and the 1-hour Ozone (1979) standard was revoked on June 15, 2005.

State(s)	General Area Name (see note)	2010 Population in 1000s (area count)									
		8-Hr Ozone (2008)	PM-2.5 (2012)	PM-2.5 (2006)	PM-2.5 (1997)	PM-10 (1987)	SO2 (2010)	SO2 (1971)	Lead (2008)	Lead (1979)	
AK	Fairbanks			87(1)							
AL	Troy								2(1)		
AZ	Ajo					9(1)					
AZ	Douglas/Paul Spur (Cochise County)					17(1)					
AZ	Hayden/Miami					26(2)	20(2)	5(1)	5(1)		
AZ	Nogales			31(1)		30(1)					
AZ	Phoenix-Mesa	3,850(1)				3,853(1)					
AZ	Rillo (Pima County)					3(1)					
AZ	West Pinal			52(1)		283(1)					
AZ	Yuma					101(1)					
CA	Amador and Calaveras Cos (Central Mountain Cos)	45(1)									
CA	Chico	220(1)		218(1)							
CA	Imperial County	175(1)	154(1)	154(1)		147(1)					
CA	Los Angeles-South Coast Air Basin	15,723(3)	15,716(1)	15,716(1)	15,716(1)				9,437(1)		
CA	Mariposa and Tuolumne Cos (Southern Mountain Cos)	18(1)									
CA	Mono County					0(1)					
CA	Nevada Co. (Western Part)	82(1)									
CA	Owens Valley					7(1)					
CA	Plumas County		6(1)								
CA	Sacramento Metro	2,241(1)		2,208(1)							
CA	San Diego	3,095(1)									
CA	San Francisco-Bay Area	6,573(1)		6,971(1)							
CA	San Joaquin Valley	3,938(2)	3,842(1)	3,842(1)	3,842(1)	126(1)					
CA	San Luis Obispo	2(1)									
CA	Sevier Valley					4(1)					
CA	Southeast Desert Modified AQMA	1,294(2)				495(2)					
CA	Tuscan Buttes	0(1)									
CA	Ventura County	823(1)									
CO	Denver-Boulder-Greeley-Ft Collins-Loveland	3,330(1)									
CT	Greater Connecticut	1,529(1)									
DC-MD-VA	Washington	5,136(1)									
FL	Jacksonville					6(1)					
FL	Tampa-St. Petersburg-Clearwater					17(1)			4(1)		
GA	Atlanta	4,753(1)									
GU	Pfai Power Plant							1(1)			
GU	Tanguisson Power Plant							1(1)			
IA	Council Bluffs								13(1)		
IA	Muscatine County					30(1)					
ID	Pocatello					1(1)					
ID	Shoshone County		7(1)			11(2)					
IL	Peoria					41(1)					
IL-IN-WI	Chicago-Joliet-Napier	9,180(1)				189(1)			36(1)		
IN	Evansville					8(1)					
IN	Indianapolis					410(2)					
IN	Muncie								1(1)		
IN	Terre Haute					54(1)					
KS	Salina								0(1)		
KY-IN	Louisville				1,019(1)	3(1)					
LA	Baton Rouge	733(1)									
LA	New Orleans					36(1)					
MA-NH	Boston-Worcester-Manchester	17(1)				124(1)					
MD	Baltimore	2,883(1)									
MI	Belding								2(1)		
MI	Detroit-Ann Arbor					254(1)					
MN	Minneapolis-St Paul								9(1)		
MO	Iron, Dent, and Reynolds Counties								0(1)		
MO-IL	St Louis	2,571(1)			2,573(1)	62(1)			44(2)	3(1)	
MO-KS	Kansas City					57(1)					
MT	Billings/Laurel							7(1)			
MT	Butte					34(1)					
MT	Columbia Falls (Flathead County)					5(1)					
MT	East Helena							3(1)		3(1)	
MT	Kalispell (Flathead County)					18(1)					
MT	Lame Deer					1(1)					
MT	Libby				9(1)	3(1)					
MT	Missoula					60(1)					
MT	Polson (Lake County)					4(1)					
MT	Ronan (Lake County)					3(1)					
MT	Thompson Falls					1(1)					

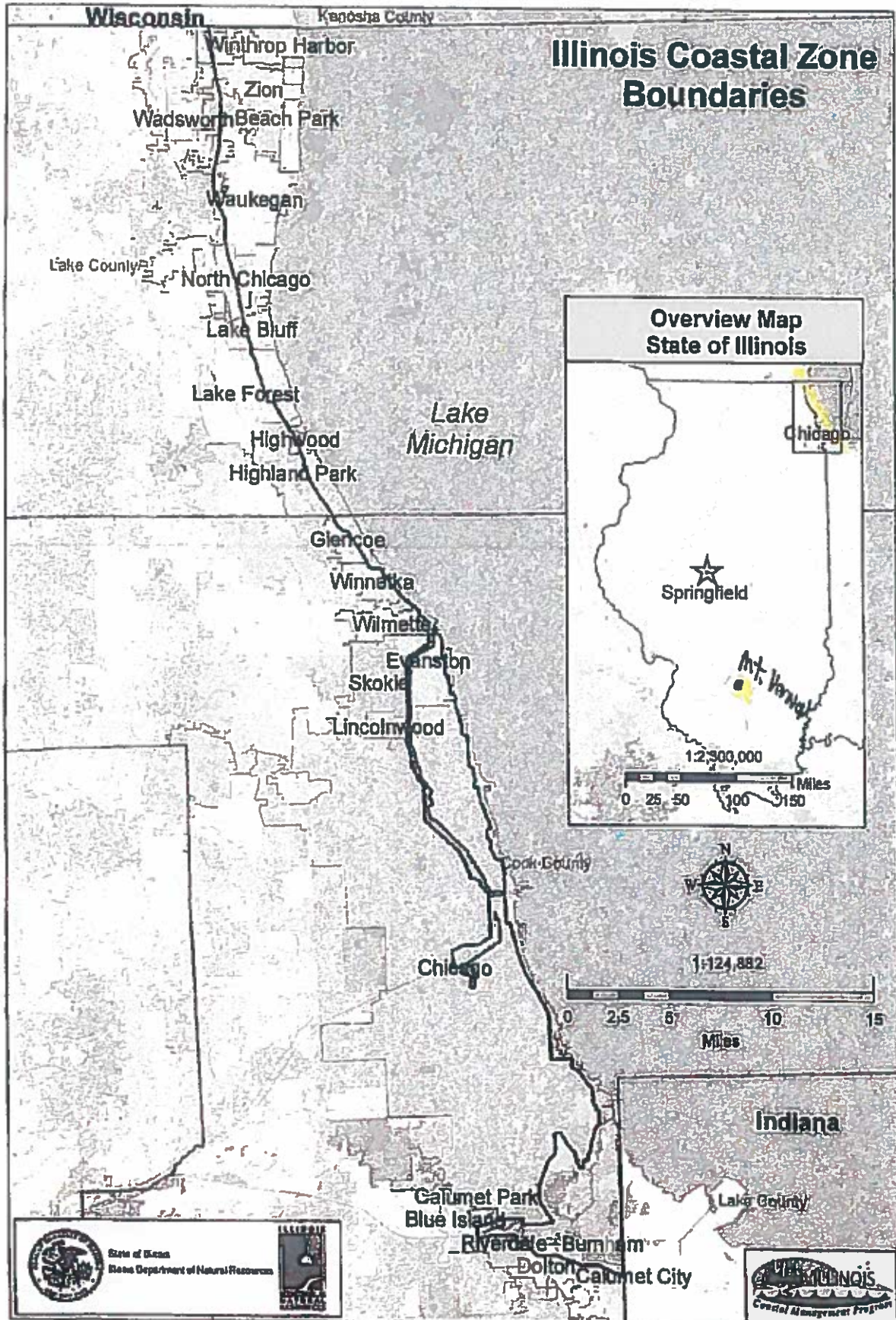
State(s)	General Area Name (see note)	2010 Population in 1000s (area count)								
		8-Hr Ozone (2008)	PM-2.5 (2012)	PM-2.5 (2006)	PM-2.5 (1997)	PM-10 (1987)	SO2 (2010)	SO2 (1971)	Lead (2008)	Lead (1978)
MT	Whitefish (Flathead County)					6(1)				
NM	Anthony					3(1)				
NY	Jamestown	135(1)								
NY-NJ-CT	New York-N. New Jersey-Long Island	20,217(1)				1,586(1)				
OH	Cleveland-Akron-Elyria	2,882(1)	1,581(1)				230(1)		8(1)	
OH	Columbus-Marion-Charles	1,755(1)								3(1)
OH	Deer									
OH-KY-IN	Cincinnati-Middletown-Wilmington	1,989(1)					32(1)			
OH-WV	Steubenville-Weirton						58(1)			
OR	Klamath Falls			47(1)						
OR	Oakridge			4(1)		4(1)				
PA	Clearfield and Indiana Counties						93(1)			
PA	Harrisburg-Lebanon-Carlisle		134(1)							
PA	Lancaster	519(1)								
PA	Pittsburgh-New Castle	2,359(1)	1,223(1)	21(1)	21(1)		142(2)	5(1)	18(1)	
PA	Reading	411(1)							49(2)	
PA	Warren County						18(1)			
PA-NJ	Allentown-Bethlehem-Easton	712(1)						109(1)		
PA-NJ-DE-MD	Philadelphia-Wilmington-Atlantic City	7,834(2)	559(1)							32(1)
PR	Arecibo									
TN	Johnson City-Kingsport-Bristol						15(1)			
TN	Knoxville-Sevierville-La Follette			882(1)	882(1)					
TX	Dallas-Fort Worth	6,280(1)								4(1)
TX	El Paso					649(1)				
TX	Houston-Sugar Land-Baytown	5,892(1)								
UT	Ogden					83(1)				
UT	Provo			518(1)		517(1)				
UT	Salt Lake City		1,665(1)			1,030(1)		1,030(1)		
UT	Tooele County							58(1)		
UT-ID	Logan			125(1)						
WI	Rhineland						18(1)			
WI	Sheboygan	118(1)								
WV-OH	Parkersburg-Marietta						4(1)			
WV-OH	Wheeling						20(1)			
WY	Sheridan					17(1)				
WY	Upper Green River Basin	11(1)								
Total Estimated 2010 Population in Nonattainment Areas (1000's)		2010 Population in 1000s (area count) by Pollutant								
Across All Criteria Pollutants: 126,445		8-Hr Ozone (2008)	PM-2.5 (2012)	PM-2.5 (2006)	PM-2.5 (1997)	PM-10 (1987)	SO2 (2010)	SO2 (1971)	Lead (2008)	Lead (1978)
		119,401 (43)	23,223 (8)	32,339 (16)	23,862 (7)	9,135 (37)	1,921 (28)	1,217 (9)	9,866 (20)	5 (2)

The Summary Population Exposure Report is a summary of the population living in an area that is in nonattainment for at least one of the NAAQS.

Area Name:

The "State(s) Area Name" column contains a common or general name for the nonattainment areas on the row, but may not reflect the exact name of any area on the row. This column cannot be exact since the nonattainment area for one pollutant may not contain the same counties, cities, or states as the nonattainment area for another pollutant on the same row. The abbreviations listed in the "State(s)" column reflect all states identified in row. However, some states on a row may be nonattainment for some pollutants and not for others in the general area. A multi-state area with states that have not all been redesignated to maintenance is counted as a nonattainment area until all of the states in the area are redesignated, with the whole area population displayed.

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# Illinois Coastal Area



Illinois DNR Coastal Management Program

# Coastal Management Program (ICMP)



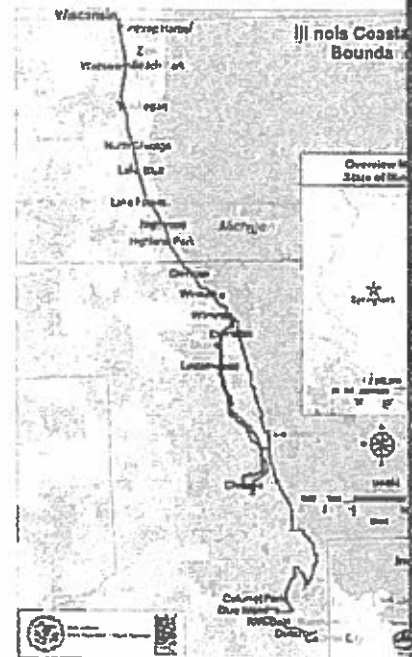
## Overview

On January 31, 2012, the Illinois Coastal Management Program (ICMP) received Federal approval from the National Oceanic Atmospheric Administration, Office of Ocean and Coastal Resources Management. Illinois joins a total of 29 coastal states and five island territories that have developed CZM programs and represent more than 99.9 percent of the nation's 95,331 miles of oceanic and Great Lakes coastline.

Illinois is dedicated to protecting and managing the natural and cultural resources along our magnificent 63 mile stretch of Lake Michigan shoreline. During the last two centuries, Illinois' coast has undergone nearly a complete metamorphosis with its monumental hydrologic modifications, enormous industrial impacts, building of an excellent transportation infrastructure, and creation of skyscrapers that grace our shoreline. With all these changes, it is remarkable that our coastal resources still contain some of the richest, rarest and most diverse complex of plant and animal species and natural habitat areas in the state.

Our shoreline is highly urbanized and has been subject to considerable stress from intense land use and competition to serve the economic and workforce needs and demands of this densely populated area. Lake and Cook counties are currently home to 6 million people and are projected to be home to nearly 6.8 million people by 2030. It is estimated that more than 20 million visitors visit the Lake Michigan shoreline each year. Illinois Beach State Park alone has over 2 million visitors annually. Lake Michigan provides water supply to nearly 7 million Illinois residents (over half of the state's entire population).

The environmental legacy of our industrial sites and the needs and demands of a growing and vibrant urban community create a complex set of issues to balance as we invest in programs that seek to restore our ecosystems and meet the increasing demands for open space, recreation, and public access.



## Coastal Management Program Priorities

The ICMP will initially focus on efforts to address the following program areas which are also outlined in the Great Lakes Regional Collaboration Strategy. The ICMP will describe desired outcomes, prioritize strategies for achieving them, and suggest site specific projects:

- **Invasive Species.** The ICMP will include mitigation and long term sustainable solutions to terrestrial invasive species. Strategies for controlling aquatic invasive species will initially focus on the Chicago and Sanitary Ship Canal hydrologic/ecological separation of the Illinois River basin from the Lake Michigan basin.
- **Habitat, Ecosystems and Natural Area Restoration.** The ICMP will address the undeveloped portions of shoreland in Cook and Lake Counties immediately north of Chicago to the Wisconsin state line. These areas include, North Shore Marina & Illinois Beach State Park including the Dead River & Kellogg Creek Watersheds, Waukegan Beach Bluff forest preserve, and wooded ravines along the Lake Michigan bluffs. The Chicago River & North Shore River Corridors & Wilmette Harbor are increasingly important habitat corridors and will be included in the ICMP. On the South Side of the City of Chicago, the Little Calumet & Grand Calumet River corridors, Lake Calumet, Calumet River and the surrounding wetland areas are an important habitat area but also contain some of the most degraded industrial areas. These areas will also be addressed.
- **Areas of Concern.** Waukegan harbor is the one designated AOC in Illinois. Six of 14 use impairments have been identified for the Waukegan AOC. The impairments include restrictions on fish and wildlife consumption, benthic degradation, restrictions on dredging, beach closings, degradation of phytoplankton populations and loss of fish and wildlife habitat. The ICMP will develop a priority list for projects in Waukegan Harbor, Waukegan Lakefront & Waukegan River Watershed to remove these impairments.
- **Persistent Bio-accumulative Toxins.** Toxic issues in northeastern Illinois are generally legacy issues from our industrial past. They are mostly well documented and tend to be concentrated in the river sediments, brownfields and superfund sites. The ICMP will develop site specific strategies for each property and develop priorities for long term restoration strategies as appropriate.
- **Sustainable Development.** The Illinois coast is primarily urban with the few exceptions mentioned previously. The ICMP will focus on the development of strategies to mitigate and adapt to climate change, including reducing individual carbon footprints, and the expanding the use of our natural resources to act as natural carbon sinks.
- **Non-point source.** Non-point source pollution is primarily related to storm-water management which for the most part is managed, treated and ultimately discharged away from the Lake Michigan Basin. Despite the investment of billions of dollars over the decades, basement flooding, and diversions of untreated sewage into Lake Michigan are not uncommon across the region. The ICMP will facilitate an important discussion of expanding the use of green infrastructure to control storm-water, promote groundwater recharge and reduce flooding.
- **Information and Indicators.** The ICMP will identify existing and ongoing data collections and indicators. It will identify gaps in data and develop priorities for future data collection efforts. The ICMP will also assist in the collaborative development of sustainability indicators for the region.
- **Public Access and Recreation.** Illinois' shoreline is increasingly used for recreation at unprecedented levels. The demand for public access to the lake and recreation resources has outstripped the supply and this demand will continue to grow in the future. There will always be a need for expanded and improved recreational facilities and services. The ICMP will provide technical and financial assistance to acquire new, add or improve public recreation sites and facilities, and to create new or improve public access sites.
- **Economic Development.** Our coastal communities are essential components of a strong Illinois economy. The ICMP will provide assistance to improve management programs and support state and local government efforts to identify and designate areas especially suited for water-related economic development and in redeveloping port and waterfront areas. The ICMP will provide technical and financial assistance in the regional planning process for water transmission and transportation routes.

#### **How can the ICMP benefit coastal communities?**

Illinois is eligible to receive approximately \$2 million per year, which will fund a grants program to implement coastal protection projects. Local and state agencies and non-profit organizations would be eligible to apply for and receive funds. Examples of how other States/communities have used these funds include:

- low-cost construction projects such as dune walkovers and boat launches
- planning and creation of beach access points
- reinvigorating economically depressed waterfront areas
- preventing and monitoring beach erosion
- providing technical assistance on shore protection and bluff stabilization
- providing assistance for local planning in coastal areas

The types of activities that can be funded are broadly defined and will be left to the creativity of state and local governments and organizations, as long as the goals of the ICMP are addressed and the projects occur within the coastal zone.

**Boundary.**

Key IDNR staff who assisted in developing the ICMP and preparing the necessary documents for program approval

Todd Main, Federal Consistency Coordinator

Diane Tecic, Coastal Program Manager

Rachel Sudimack, Green Marinas Program Coordinator

The ICMP will initially focus on efforts to address the following program areas which are also outlined in the Great Lakes Regional Collaboration Strategy. The ICMP will describe desired outcomes, prioritize strategies for achieving them, and suggest site specific projects. Illinois is eligible to receive approximately \$2 million per year, which will fund a program to implement local projects. Local and state agencies and non-profit organizations would be eligible to apply for and receive funds. A few examples of how other States/communities have used these funds include: The types of projects that can be funded are broadly defined and will be left to the creativity of state and local governments and organizations as long as the goals of the ICMP are addressed and the projects occur within the ICMP Boundary. Key IDNR staff who assisted in developing the ICMP and preparing the necessary documents for program approval are:





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FACILITY INFORMATION	AFs	ACRES	BR	SEMS	GHG	PCSICIS	RADInfo	RCRAInfo	TR	1
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CONTINENTAL  
TIRE NORTH  
AMERICA

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#### FACILITY INFORMATION

AFs	ACRES	BR	SEMS	GHG
-----	-------	----	------	-----

VERNON, IL

62864

Latitude: 38.286944

Longitude: -88.887778

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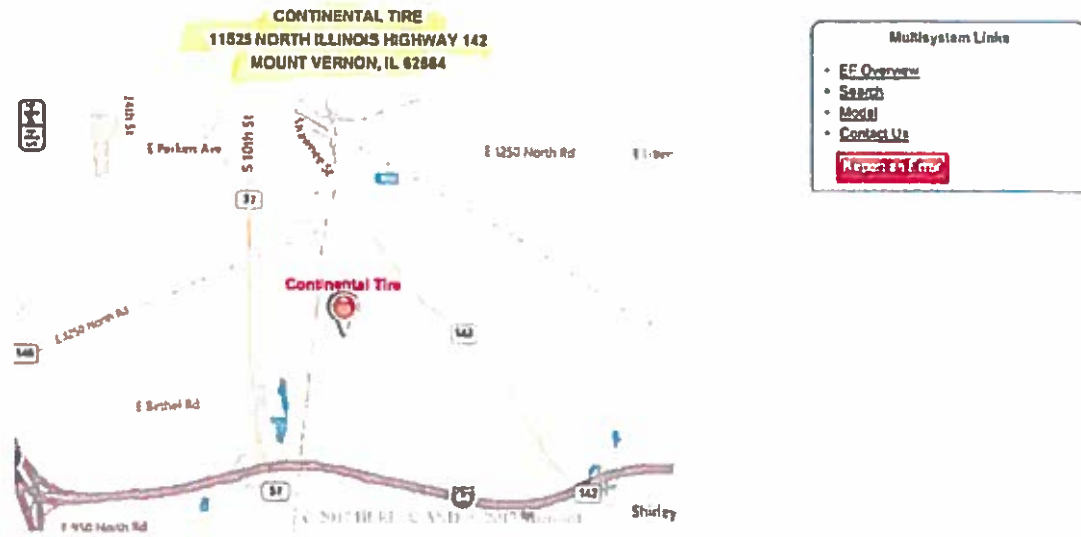
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**EPA Facility Information**

This query was executed on MAR-17-2017

**AFS Information**

<u>Operating Status</u>	O	<u>HPV Flag</u>	
<u>Operating Status Description</u>	OPERATING	<u>State Registration Number</u>	081803AAB
<u>State/County Compliance Source</u>	1708100025	<u>Government Facility Code Description</u>	PRIVATELY OWNED/OPERATED
<u>Region Code</u>	05	<u>Class Code</u>	A
<u>Primary SIC Code</u>	3011	<u>Class Code Description</u>	ACTUAL OR POTENTIAL EMISS
<u>Primary SIC Description</u>	TIRES AND INNER TUBES	<u>Compliance Status</u>	C
<u>NAICS Code</u>	326211	<u>Compliance Status Description</u>	IN COMPLIANCE WITH PROCED
<u>NAICS Code Description</u>	Tire Manufacturing (except Retreading)	<u>Date Plant Information Last Updated</u>	05/16/2014

**Air Program Information**

<u>Air Program Code</u>	<u>Air Program Description</u>	<u>Air Program Status</u>	<u>Air Program Status Description</u>	<u>Air Program Subpart</u>	<u>Air Program Subpart Description</u>	<u>Class Code</u>	<u>Class Code Description</u>	<u>Compliance Status</u>	<u>Compliance Status Description</u>
0	SIP	O	OPERATING			A	ACTUAL OR POTENTIAL EMISS	C	IN COMPLIANCE WITH PROCED
8	PSD	O	OPERATING			A	ACTUAL OR POTENTIAL EMISS	C	IN COMPLIANCE WITH PROCED
V	TITLE V PERMITS	O	OPERATING			A	ACTUAL OR POTENTIAL EMISS	C	IN COMPLIANCE WITH PROCED

**Pollutant Data**

Air Program Code	Pollutant Code / CAS Number	Pollutant / CAS Description	Attain Indicator	Attain Indicator Description	Pollutant Compliance Status	ES Pollutant Compliance Description	Pollutant Class Code	Pollutant Class Description
0	CO	<u>CARBON MONOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	B	POTENTIAL UNCONTROLLED EM
0	FACIL	<u>FACILITY-WIDE PERMIT REQUIREMENTS</u>			C	IN COMPLIANCE WITH PROCED		
0	NO2	<u>NITROGEN DIOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS
0	PM10	<u>PARTICULATE MATTER &lt; 10 UM</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	SM	POT EMISSIONS BELOW MAJR
0	PM2.5	<u>PARTICULATE MATTER &lt; 2.5 UM</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	B	POTENTIAL UNCONTROLLED EM
0	SO2	<u>SULFUR DIOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS
0	VOC	<u>VOLATILE ORGANIC COMPOUNDS</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS
6	CO	<u>CARBON MONOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	B	POTENTIAL UNCONTROLLED EM
6	NO2	<u>NITROGEN DIOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS
6	PM10	<u>PARTICULATE MATTER &lt; 10 UM</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	SM	POT EMISSIONS BELOW MAJR
6	PM2.5	<u>PARTICULATE MATTER &lt; 2.5 UM</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	B	POTENTIAL UNCONTROLLED EM
6	SO2	<u>SULFUR DIOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS
6	VOC	<u>VOLATILE ORGANIC COMPOUNDS</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS
V	CO	<u>CARBON MONOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	B	POTENTIAL UNCONTROLLED EM
V	NO2	<u>NITROGEN DIOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS
V	PM10	<u>PARTICULATE MATTER &lt; 10 UM</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	SM	POT EMISSIONS BELOW MAJR
V	PM2.5	<u>PARTICULATE MATTER &lt; 2.5 UM</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	B	POTENTIAL UNCONTROLLED EM
V	SO2	<u>SULFUR DIOXIDE</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS
V	VOC	<u>VOLATILE ORGANIC COMPOUNDS</u>	A	ATTAINMENT AREA FOR A GIV	C	IN COMPLIANCE WITH PROCED	A	ACTUAL OR POTENTIAL EMISS

Compliance Monitoring System Plan

CMS Start Date	FY2008 CMS Indicator	FY2008 CMS Indicator Description	FY2009 CMS Indicator	FY2009 CMS Indicator Description
01-OCT-01	A	TITLE V MAJOR	A	TITLE V MAJOR

Plant Actions

Action Number	Key Action Numbers	Air Program Codes	National Action Type	National Action Description	Action Type	Action Description	Date Achieved	Penalty Amount	Results Code	Results Code Description	Pollutant Code	Regional Data Element	Regional Data Element
00074		V	SR		SR				MC		N		15

Action Number	Key Action Numbers	Air Program Codes	National Action Type	National Action Description	Action Type	Action Description	Date Achieved	Penalty Amount	Results Code	Results Code Description	Pollutant Code	Regional Data Element	Regional Data Element
				TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL		COMPLIANCE CERTIFICATION STATE REVIEW	21-APR-14			IN COMPLIANCE			15
00073		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CB	TITLE V COMPLIANCE CERT DUE/RECEIVED BY STATE/LOCAL	15-APR-14					N	
00072		O	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	81	STATE CONDUCTED FCE/ON SITE	14-AUG-13						
00071		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	COMPLIANCE CERTIFICATION STATE REVIEW	09-APR-13		MC	IN COMPLIANCE		N	
00070		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CB	TITLE V COMPLIANCE CERT DUE/RECEIVED BY STATE/LOCAL	01-APR-13					N	
00069		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	COMPLIANCE CERTIFICATION STATE REVIEW	13-MAR-13		MC	IN COMPLIANCE		N	
00068		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CB	TITLE V COMPLIANCE CERT DUE/RECEIVED BY STATE/LOCAL	11-MAR-13					N	
00067		E	EX	EPA PCE/OFF-SITE	55	114 REPLY REVIEWED	04-OCT-12						
00067		V	EX	EPA PCE/OFF-SITE	55	114 REPLY REVIEWED	04-OCT-12						
00066		O	EX	EPA PCE/OFF-SITE	55	114 REPLY REVIEWED	04-OCT-12						
00066		V	EX	EPA PCE/OFF-SITE	55	114 REPLY REVIEWED	04-OCT-12						
00065		E	EX	EPA PCE/OFF-SITE	55	114 REPLY REVIEWED	04-OCT-12						
00065		V	EX	EPA PCE/OFF-SITE	55	114 REPLY REVIEWED	04-OCT-12						
00064		E	EX	EPA PCE/OFF-SITE	55	114 REPLY REVIEWED	04-OCT-12						
00064		V	EX	EPA PCE/OFF-SITE	55	114 REPLY REVIEWED	04-OCT-12						
00063		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	COMPLIANCE CERTIFICATION STATE REVIEW	08-FEB-09		MV	IN VIOLATION		Y	
00062		O	EC		54		04-OCT-12						

Action Number	Key Action Numbers	Air Program Codes	National Action Type	National Action Description	Action Type	Action Description	Date Achieved	Penalty Amount	Results Code	Results Code Description	Pollutant Code	Regional Date Element	Regional Data Element 16
				EPA INVESTIGATION CONDUCTED		EPA INVESTIGATION CONDUCTED							
00082		V	EC	EPA INVESTIGATION CONDUCTED	54	EPA INVESTIGATION CONDUCTED	04-OCT-12						
00061		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	COMPLIANCE CERTIFICATION STATE REVIEW	28-MAR-12		MC	IN COMPLIANCE			N
00060		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CB	TITLE V COMPLIANCE CERT DUE/RECEIVD BY STATE/LOCAL	09-MAR-12						N
00058		S	LL	EPA SECTION 114 LETTER	51	114 LETTER SENT	30-AUG-11				NOX		
00056		V	LL	EPA SECTION 114 LETTER	51	114 LETTER SENT	30-AUG-11				NOX		
00037		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	COMPLIANCE CERTIFICATION STATE REVIEW	03-MAR-11		MC	IN COMPLIANCE			N
00054		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CB	TITLE V COMPLIANCE CERT DUE/RECEIVD BY STATE/LOCAL	02-MAR-11						N
00055		0	FS	STATE/LOCAL CONDUCTED FCE/ON SITE	81	STATE CONDUCTED FCE/ON SITE	18-MAR-11						
00054		C	TR	STATE/LOCAL REQ (O/O) STACK TEST/NOT OBSV BUT REVVD	35	STATE REQ (O/O COND) STACK TEST/NOT OBSVD BUT REVVD	29-APR-10		PP	STACK TEST PASSED			
00053		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	COMPLIANCE CERTIFICATION STATE REVIEW	27-APR-10		MC	IN COMPLIANCE			N
00052		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CB	TITLE V COMPLIANCE CERT DUE/RECEIVD BY STATE/LOCAL	16-APR-10						N
00051		V	SR	TV COMPLIANCE CERTIFICATION REVIEW BY STATE/LOCAL	SR	COMPLIANCE CERTIFICATION STATE REVIEW	09-JUN-09		MC	IN COMPLIANCE			N
00050		V	CB	TITLE V ANNUAL COMPL CERT	CB	TITLE V COMPLIANCE CERT	15-APR-09						N

Action Number	Key Action Numbers	Air Program Codes	National Action Type	National Action Description	Action Type	Action Description	Date Achieved	Penalty Amount	Results Code	Results Code Description	Pollutant Code	Regional Data Element	Regional Data Element ID
				DUE/RECVD BY STATE/LOCAL		DUE/RECEIVED BY STATE/LOCAL							
00049		D	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	81	STATE CONDUCTED FCE/ON-SITE	14-MAY-09						
00048		V	CB	TITLE V ANNUAL COMPL CERT DUE/RECVD BY STATE/LOCAL	CB	TITLE V COMPLIANCE CERT DUE/RECEIVED BY STATE/LOCAL	08-JAN-09					N	
00047		D	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	81	STATE CONDUCTED FCE/ON-SITE	22-AUG-07						
00046		V	ER	COMPLIANCE CERTIFICATION EPA REVIEW	ER	COMPLIANCE CERTIFICATION EPA REVIEW	03-JUL-08		MV	IN VIOLATION		Y	
00045		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	24-APR-08						
00044		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	26-APR-05						
00043		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	26-APR-05						
00042		V	ER	COMPLIANCE CERTIFICATION EPA REVIEW	ER	COMPLIANCE CERTIFICATION EPA REVIEW	18-AUG-05		MC	IN COMPLIANCE		N	
00041		D	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	81	STATE CONDUCTED FCE/ON-SITE	08-FEB-05						
00040		V	ER	COMPLIANCE CERTIFICATION EPA REVIEW	ER	COMPLIANCE CERTIFICATION EPA REVIEW	25-MAY-04		MC	IN COMPLIANCE		N	
00039		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	20-APR-04						
00038		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	20-APR-04						
00037		D	FS	STATE/LOCAL CONDUCTED FCE/ON-SITE	81	STATE CONDUCTED FCE/ON-SITE	09-SEP-03						
00036		V	ER	COMPLIANCE CERTIFICATION EPA REVIEW	ER	COMPLIANCE CERTIFICATION EPA REVIEW	21-MAR-03		MC	IN COMPLIANCE		N	
00035		V	CC		CC								

Action Number	Key Action Numbers	Air Program Codes	National Action Type	National Action Description	Action Type	Action Description	Date Achieved	Penalty Amount	Results Code	Results Code Description	Pollutant Code	Regional Data Element	Regional Data Element 16
				TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA		TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	06-MAR-03						
00034		V	ER	COMPLIANCE CERTIFICATION EPA REVIEW	ER	COMPLIANCE CERTIFICATION EPA REVIEW	21-MAR-03		MC	IN COMPLIANCE		N	
00033		V	CC	TITLE V ANNUAL COMPL CERT DUE/RECEIVED BY EPA	CC	TITLE V COMPLIANCE CERT DUE/RECEIVED BY EPA	06-MAR-03						
00032		0	P5	STATE/LOCAL PCE/ON-SITE	03	STATE PCE/ON-SITE	24-JUN-02						
00031		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	19-JUL-01						
00030		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	14-MAR-00						
00029		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	27-JUL-99						
00028		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	22-JUN-98						
00027		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	25-OCT-86						
00026		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	10-APR-98						
00026		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	10-APR-98						
00025		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	05-DEC-88						
00025		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	05-DEC-98						
00024		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	24-JAN-96						
00023		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	24-JAN-96						

Action Number	Key Action Numbers	Air Program Codes	National Action Type	National Action Description	Action Type	Action Description	Date Achieved	Penalty Amount	Results Code	Results Code Description	Polytenu Code	Regional Data Element	Regional Data Element
00022		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	15-MAR-95						16
00021		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	27-JUL-94						
00020		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	01-MAR-94						
00019		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	22-JAN-93						
00019		6	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	22 JAN 93						
00018		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	25-FEB 92						
00018		6	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	25-FEB 92						
00016		6	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	21-NOV 81						
00015		0	5C	STATE INSPECTION LEVEL 2 OR GREATER	79	STATE INSPECTION LEVEL 2 OR GREATER	14-JAN 91						
00015		6	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	14-JAN-91						
00014		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	20-MAR 90						
00014		6	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	20-MAR 90						
00013		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	21-APR 89						
00012		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	15-SEP 88						
00011		0	7C	STATE/LOCAL NOV ISSUED	D4	STATE WARNING LETTER	14-JAN 88						



Action Number	Key Action Numbers	Air Program Codes	National Action Type	National Action Description	Action Type	Action Description	Date Achieved	Penalty Amount	Results Code	Results Code Description	Pollutant Code	Regional Data Element	Regional Data Element 16
00010		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	16-JAN-87						
00009		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	14-MAR-88						
00008		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	24-JAN-85						
00007		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	11-APR-84						
00006		0	7C	STATE/LOCAL NOV ISSUED	04	STATE WARNING LETTER	14-APR-83						
00005		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	12-APR-83						
00004		0			21	PERMIT ISSUED	05-JAN-83						
00003		0			21	PERMIT ISSUED	29-NOV-82						
00002		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	17-MAR-82						
00001		0	5C	STATE INSPECTION - LEVEL 2 OR GREATER	79	STATE INSPECTION - LEVEL 2 OR GREATER	18-MAR-81						

Additional information can be obtained from Air Facility System [AFS](#) Search

**Greenhouse Gas (GHG)**

Latest Reporting Year: 2015  
 NAICS Code: 328211  
 NAICS Description: TIRE MANUFACTURING (EXCEPT RETREADING)

Total Facility Emissions in metric tons CO <sub>2</sub> e (excluding Biogenic CO <sub>2</sub> ):	64580
Total Emissions by Gas in metric tons CO <sub>2</sub> e	
Carbon Dioxide (CO <sub>2</sub> )	64513
Methane (CH <sub>4</sub> )	31
Nitrous Oxide (N <sub>2</sub> O)	38

For reporting year 2015, CONTINENTAL TIRE the AMERICAS LLC has submitted the following subparts (click on the subpart to view the details)

Stationary Combustion

Additional information can be found on the GHG Data Publication Tool 

Integrated Compliance Information System (ICIS)

Facility

<b>FACILITY NAME (1)</b>	CONTINENTAL TIRE THE AMERICAS	<b>NPDES</b>	IL0335017
<b>STREET 1</b>	11525 N IL HIGHWAY 142	<b>SIC CODE</b>	3011 = Tires And Inner Tubes
<b>CITY</b>	MT VERNON	<b>MAJOR / MINOR</b>	
<b>COUNTY NAME</b>	Jackson	<b>TYPE OF OWNERSHIP</b>	Privately Owned Facility
<b>STATE</b>	IL	<b>ACTIVITY STATUS</b>	Admin Continued
<b>ZIP CODE</b>	62864	<b>INACTIVE DATE</b>	
<b>REGION</b>	Region 5	<b>TYPE OF PERMIT ISSUED</b>	NPDES Individual Permit
<b>LATITUDE</b>	36 280333	<b>ORIGINAL PERMIT ISSUE DATE</b>	01-FEB-1988
<b>LONGITUDE</b>	-88 695	<b>PERMIT ISSUED DATE</b>	22-FEB-2012
<b>LAT/LON CODE OF ACCURACY</b>	30	<b>PERMIT EXPIRED DATE</b>	31-JAN-2017
<b>LAT/LON METHOD</b>			
<b>LAT/LON SCALE</b>		<b>USGS HYDRO BASIN CODE</b>	
<b>LAT/LON DATUM</b>		<b>FLOW</b>	
<b>RECEIVING WATERS</b>	CASEY FORK CREEK	<b>FEDERAL GRANT IND</b>	N
<b>PRETREATMENT CODE</b>		<b>SLUDGE CLASS FAC IND</b>	NON POTW
<b>MAILING NAME</b>	CONTINENTAL TIRE-MT VERNON	<b>SLUDGE RELATED PERMIT NUM</b>	
<b>MAILING STREET (1)</b>	11525 N IL HIGHWAY 142	<b>ANNUAL DRY SLUDGE PROD</b>	
<b>MAILING STREET (2)</b>			
<b>MAILING CITY</b>	MT VERNON		
<b>MAILING STATE</b>	Illinois		
<b>MAILING ZIP CODE</b>	62864		
<b>COGNIZANT OFFICIAL</b>	KEITH PEARSON	<b>COGNIZANT OFFICIAL TEL</b>	8182482450

This facility has permits to discharge the following chemical/substances through the points (pipes) listed in the table below

PARAMETER CODE	PARAMETER DESCRIPTION	NUMBER OF DISCHARGE POINTS
7782505	Chlorine, total residual	9
	Solids, total dissolved	3
	Temperature, water den fahrenheit	9
16887008	Chloride (as Cl)	5
14808798	Sulfate, total (as SO4)	5
	pH	10
	Solids, total dissolved, 180 deg C	2
	Oil and grease	4
	Flow, in conduit or thru treatment plant	14
	Solids, total suspended	13
	Oil & Grease	2

Additional Information can be obtained from Water Discharge Permit Information [ICIS](#) Search

Toxic Releases for Reporting Year 2015

TRF Facility Id 62864GNRLTHWY14

There were no SIC Codes reported to EPA for this facility

Chemicals Transferred to other Sites

Chemical Name	TRI Chemical Id	Document Control Number	Total Release	Transfer Basis Est Code	Type Of Waste Management	Off Site Name	City Name
LEAD	007439921	1315213194350	1.05		TRANSFER TO WASTE BROKER - RECYCLING	BUZZI UNICEM USA - CAPE GIRARDEAU	CAPE GIRARDEAU
ZINC COMPOUNDS	N982	1315213194362	65.45		TRANSFER TO WASTE BROKER - RECYCLING	BUZZI UNICEM USA - CAPE GIRARDEAU	CAPE GIRARDEAU

Chemicals Released to Air

Chemical Name	TRI Chemical Id	Document Control Number	Total Release	Release Basis Est Code	Environmental Medium
DIETHANOLAMINE	000111422	1315213194347	5		STACK OR POINT EMISSIONS
DIETHANOLAMINE	000111422	1315213194347	15472.62		FUGITIVE OR NON-POINT EMISSIONS
LEAD	007439921	1315213194350	.000059		STACK OR POINT EMISSIONS
ZINC COMPOUNDS	N982	1315213194362	61.64		STACK OR POINT EMISSIONS

Chemicals Released via Underground Injection

There was no data of this type reported for this facility

Chemicals Released to Land

There was no data of this type reported for this facility

Chemicals Released to Surface Water

There was no data of this type reported for this facility

Additional information can be obtained from the Toxics Release Inventory (TRI) Search

Additional links for TRI:

This information resource is not maintained, managed, or owned by the Environmental Protection Agency (EPA) or the Envirofacts Support Team. Neither the EPA nor the Envirofacts Support Team is responsible for their content or site operation. The Envirofacts Warehouse provides this reference only as a convenience to our Internet users.

- National Library of Medicine (NLM) [TOXMAP \(TRI Discharges\)](#).
- The Environmental Defense Fund's (EDF) Chemical Scorecard has on-line environmental information regarding this facility's [EPA Discharges](#) reported TRI releases.

RCRAInfo

HANDLER ID: LD008558422

LIST OF NAICS CODES AND DESCRIPTIONS

NAICS CODE	NAICS DESCRIPTION
328211	TIRE MANUFACTURING (EXCEPT RETREADING)

HANDLER / FACILITY CLASSIFICATION

HANDLER TYPE	LAND DISPOSAL	INCINERATOR	BOILER AND/OR INDUSTRIAL FURNACE	STORAGE	TREATMENT
Permit Progress					Y

HANDLER TYPE
TSDs Potentially Subject to Corrective Action Under Discretionary Authority
Conditionally Exempt Small Generator
Subject to CA

LIST OF PROCESS UNIT INFORMATION FOR GROUP 01

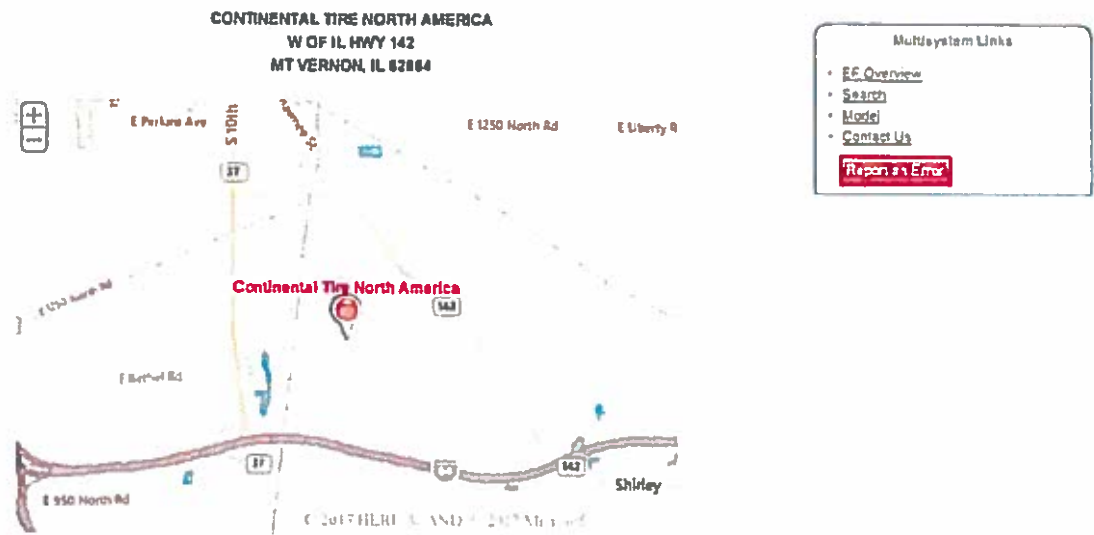
PROCESS CODE / DESCRIPTION	LEGAL OPERATING STATUS	UNIT OF MEASUREMENT TYPE / DESCRIPTION	CAPACITY TYPE / DESCRIPTION	QUANTITY	CAPACITY	EFFECTIVE DATE
S01 - CONTAINER	INTERIM STATUS - CLEAN CLOSED	G - GALLONS		1	3200	09-JAN-87

LIST OF PROCESS UNIT INFORMATION FOR GROUP 02

PROCESS CODE / DESCRIPTION	LEGAL OPERATING STATUS	UNIT OF MEASUREMENT TYPE / DESCRIPTION	CAPACITY TYPE / DESCRIPTION	QUANTITY	CAPACITY	EFFECTIVE DATE
T04 - OTHER TREATMENT	INTERIM STATUS - CLEAN CLOSED	U - GALLONS PER DAY		1	20	09-JAN-87

Additional information can be obtained from Resource Conservation and Recovery Information [RCRAInfo](#) Search

**Envirofacts  
Search Results**



\*You can navigate within the map with your mouse

[EPA Facility Information](#)

This query was executed on MAR 17-2017

**Integrated Compliance Information System (ICIS)**

**Facility**

<b>FACILITY NAME (1)</b>	CONTINENTAL TIRE NORTH AMERICA	<b>NPDES</b>	ILR10H384
<b>STREET 1</b>	OFF OF IL HWY 142	<b>SIC CODE</b>	
<b>CITY</b>	MOUNT VERNON	<b>MAJOR / MINOR</b>	
<b>COUNTY NAME</b>	Jefferson	<b>TYPE OF OWNERSHIP</b>	Privately Owned Facility
<b>STATE</b>	IL	<b>ACTIVITY STATUS</b>	Terminated
<b>ZIP CODE</b>	62864	<b>INACTIVE DATE</b>	
<b>REGION</b>	Region 5	<b>TYPE OF PERMIT ISSUED</b>	General Permit Covered Facility
<b>LATITUDE</b>	38 285944	<b>ORIGINAL PERMIT ISSUE DATE</b>	19-MAR-2007
<b>LONGITUDE</b>	-88 887778	<b>PERMIT ISSUED DATE</b>	19-MAR-2007
<b>LAT/LON CODE OF ACCURACY</b>	30	<b>PERMIT EXPIRED DATE</b>	31-MAY-2008
<b>LAT/LON METHOD</b>			
<b>LAT/LON SCALE</b>		<b>USGS HYDRO BASIN CODE</b>	
<b>LAT/LON DATUM</b>		<b>FLOW</b>	
<b>RECEIVING WATERS</b>	SEVEN MILE CREEK	<b>FEDERAL GRANT IND</b>	N
<b>PRETREATMENT CODE</b>		<b>SLUDGE CLASS FAC IND</b>	NON-POTW
<b>MAILING NAME</b>	CONTINENTAL TIRE NORTH AMERICA	<b>SLUDGE RELATED PERMIT NUM</b>	
<b>MAILING STREET (1)</b>	PO BOX 1029	<b>ANNUAL DRY SLUDGE PROD</b>	
<b>MAILING STREET (2)</b>			
<b>MAILING CITY</b>	MOUNT VERNON		
<b>MAILING STATE</b>	Illinois		
<b>MAILING ZIP CODE</b>	62864		
<b>COGNIZANT OFFICIAL</b>		<b>COGNIZANT OFFICIAL TEL</b>	6182462388

Additional information can be obtained from Water Discharge Permit Information (ICIS) Search

Integrated Compliance Information System (ICIS)

Facility

<b>FACILITY NAME (S)</b>	CONTINENTAL TIRE NORTH AMERICA	<b>NPDES</b>	1LR101698
<b>STREET 1</b>	W OF IL HWY 142	<b>PC CODE</b>	
<b>CITY</b>	MT VERNON	<b>MAJOR / MINOR</b>	
<b>COUNTY NAME</b>	Jefferson	<b>TYPE OF OWNERSHIP</b>	Privately Owned Facility
<b>STATE</b>	IL	<b>ACTIVITY STATUS</b>	Terminated
<b>ZIP CODE</b>	62504	<b>INACTIVE DATE</b>	
<b>REGION</b>	Region 5	<b>TYPE OF PERMIT ISSUED</b>	General Permit Covered Facility
<b>LATITUDE</b>	38.288944	<b>ORIGINAL PERMIT ISSUE DATE</b>	27-SEP-2007
<b>LONGITUDE</b>	-88.887778	<b>PERMIT ISSUED DATE</b>	11-AUG-2008
<b>LAT/LON CODE OF ACCURACY</b>	30	<b>PERMIT EXPIRED DATE</b>	31-JUL-2013
<b>LAT/LON METHOD</b>			
<b>LAT/LON SCALE</b>		<b>USGS HYDRO BASIN CODE</b>	
<b>LAT/LON DATUM</b>		<b>FLOW</b>	
<b>RECEIVING WATERS</b>	SEVEN MILE CREEK	<b>FEDERAL GRANT IND</b>	N
<b>PRETREATMENT CODE</b>		<b>SLUDGE CLASS FAC IND</b>	NON-POTW
<b>MAILING NAME</b>	CONTINENTAL TIRE NA	<b>SLUDGE RELATED PERMIT NUM</b>	
<b>MAILING STREET (1)</b>	PO BOX 1029	<b>ANNUAL DRY SLUDGE PROD</b>	
<b>MAILING STREET (2)</b>			
<b>MAILING CITY</b>	MT VERNON		
<b>MAILING STATE</b>	Illinois		
<b>MAILING ZIP CODE</b>	62504		
<b>COGNIZANT OFFICIAL</b>		<b>COGNIZANT OFFICIAL TEL</b>	6182482398

## Cary Minnis

---

**From:** Kumerow, Kirk  
**Sent:** Friday, November 04, 2016 11:27 AM  
**To:** 'caryminnis@greateregypt.org'  
**Cc:** Goben, David; Wortman, David  
**Subject:** FW: [External] RE: ERR for Pending Jefferson County CDBG-ED Project  
**Attachments:** DCEO 10-31-16.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thanks Carry, and please thank Continental Tire for the added clarification. In my estimation, since the underlying project doesn't include building expansion or new building construction, the project cannot be construed as being "the acquisition or development of non-residential property", and thus a Phase I ASTM Report by a licensed professional will not be a requirement of its EA-level NEPA-compliance ERR.

Please place a copy of this e-mail chain (with Mr. Harmse's statement below highlighted) and the attached letter from Continental in the supporting docs. for the EA, along with the other "Contamination and Toxic Substances" supporting docs.

Thanks, Kirk (217-558-2842).

**From:** Cary Minnis [mailto:caryminnis@greateregypt.org]  
**Sent:** Thursday, November 03, 2016 11:52 AM  
**To:** Kumerow, Kirk  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Kirk,  
I have attached the letter from Continental that you requested and have copied the response to clarify that no new buildings or expansions of the existing building will be built through this project.

We will not be building any additional building in this phase. We will renovate the offices, paint the building etc. but no extension.

Best Regards

Benny

Benny Harmse  
Vice President, Manufacturing  
Mount Vernon, IL  
Continental Tire the Americas, LLC

Thanks,

Cary Minnis

**From:** Kumerow, Kirk [mailto:Kirk.Kumerow@illinois.gov]  
**Sent:** Thursday, November 03, 2016 9:50 AM  
**To:** Cary Minnis

**Cc:** Goben, David; Wortman, David

**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

I'll look at it. Dave Goben briefly showed me a piece of paper from Continental outlining how they're proposing to spend \$10million on the project. Since you are the local environmental reviewer, could you please obtain a copy of that and e-mail it to me? If you could also include confirmation that a new building is not being built through the project, or that the existing buildings aren't being expanded through the project, then I could advise that a Phase I ASTM Survey by a licensed professional would not be required, because the project wouldn't be the acquisition or development of non-residential property.

On an un-related project, could you please give me an approximate date as to when the ERR for Village of Cutler #15-242011 will be submitted for review by the State? I Im with Margie for Beau a couple of days ago, and heard he was out of the office. There are only 3 outstanding PY'15 CDBG PI ERR's, and Cutler's is one of them. We're trying to wrap those three ASAP.

Thanks, Kirk (217-558-2842).

**From:** Cary Minnis [<mailto:caryminnis@greateregypt.org>]

**Sent:** Thursday, November 03, 2016 8:37 AM

**To:** Kumerow, Kirk

**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Kirk,

We are getting ready to publish the final floodplain/wetland notice. I wondered if you would look at this draft. We still have to get the publication date and the County Board Chair name, but the rest should be complete.

Thanks,

Cary

**From:** Kumerow, Kirk [<mailto:Kirk.Kumerow@illinois.gov>]

**Sent:** Wednesday, October 12, 2016 4:41 PM

**To:** 'caryminnis@greateregypt.org'

**Cc:** [beauhenson@greateregypt.org](mailto:beauhenson@greateregypt.org); 'margiemitchell@greateregypt.org'

**Subject:** FW: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Cary: All looked well by me. You even gave the public one extra day of public comment period by giving them until 10/30/16. If published on 10/14/16, the 15 full day comment period would be 10/15 to 10/29.

I would however add Mr. White's Complete title as Jefferson County Board Chairman.

Thanks.

**From:** Cary Minnis [<mailto:caryminnis@greateregypt.org>]

**Sent:** Wednesday, October 12, 2016 9:58 AM

**To:** Kumerow, Kirk

**Cc:** Beau Henson; Margie Mitchell

**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

I had the wetlands in the letter, but I went ahead and added a little more specifics based on the IDNR response. We also have a publication date in this version. For this to be accurate we have to get it to the newspaper by 5:00pm today.



Thanks,

Cary

**From:** Kumerow, Kirk [<mailto:Kirk.Kumerow@illinois.gov>]  
**Sent:** Wednesday, October 12, 2016 10:03 AM  
**To:** Cary Minnis  
**Cc:** Beau Henson  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Cary: Please see my highlighted language below. Since DNR has imposed one of the Wetlands conditions I reference below, you'll need to revised the language to also include Wetlands and send it back to me for review. I didn't review it once I saw you stated Wetlands language had been eliminated.

I reviewed the Toxic and Hazardous Worksheet yesterday, and will send it to you today with corrections. Thanks, Kirk (217-558-2842).

**From:** Cary Minnis [<mailto:caryminnis@greateregypt.org>]  
**Sent:** Friday, October 07, 2016 3:26 PM  
**To:** Kumerow, Kirk  
**Cc:** Beau Henson  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

It appears that this is all that needs to be published. Does this look right? I left wetlands since the letter from IDNR made the statement below. I will add the dates as soon as we know when we can publish.

Thanks,

Cary

**From:** Cary Minnis [<mailto:caryminnis@greateregypt.org>]  
**Sent:** Friday, October 07, 2016 10:16 AM  
**To:** 'Kumerow, Kirk'  
**Cc:** Beau Henson  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

It looks like they did include the statement about best practices.  
"However, strict adherence to best management practices for erosion and sedimentation control should be used to minimize the possibility of any adverse impacts to vicinity wetlands and streams."

**From:** Kumerow, Kirk [<mailto:Kirk.Kumerow@illinois.gov>]  
**Sent:** Friday, October 07, 2016 10:05 AM  
**To:** Cary Minnis  
**Cc:** [beauhenson@greateregypt.org](mailto:beauhenson@greateregypt.org)  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Cary: FEMA FIRMettes are the authoritative source for HUD on whether a proposed project is in a flood plain or not, so I didn't look on the attachment in great detail. Since the previously reviewed FEMA maps showed portions of the project are in a 100-year FP, an 8-step FP review (incl. both FEMA-required publications and local public comment periods) must be performed.

To help guide you, I've attached a sample completed EA-level ERR that included an 8-step FP review. I reviewed and approved that ERR for a PY'15 rural water extension grant earlier this year. Please ignore its Exemption docs, because

they are on the older HUD forms, and not on the current HUD ER for an Exempt-CENST Activity form. I've also attached the current HUD format language for the two FEMA FP publications (they must be published, and not posted). They also include language for Wetlands (if a wetland is impacted). If DNR wholly determined a nearby Wetland wasn't affected, then you'd drop the Wetlands language. If DNR requires 1:1 mitigation or "best management practices for erosion and sedimentation control" to protect a nearby wetland, then you'd have to incl. reference to Wetlands in both FP publications as well.

Here's HUD's Floodplain Management link:

<https://www.hudexchange.info/programs/environmental-review/floodplain-management/>

Where they've listed the why's and how's.

The only other lengthy time period for gathering supporting docs. for an EA level review is the 30 or 35 day tribal consultation period. Since Beau of your staff recently completed one for the Village of Cutler, I'll let him guide you through that process. It's timeframe and those for the 8-step FP review can overlap. The key is that all supporting docs. for the 16 bodies of Federal environmental law (<https://www.hudexchange.info/environmental-review/federal-related-laws-and-authorities/>) that must be satisfied for HUD funding must be completed and documented in their entirety before you and the County Board Chairman sign and date the project's Environmental Assessment (EA) form.

Thanks, Kirk (217-558-2842).

**From:** Cary Minnis [<mailto:caryminnis@greateregypt.org>]  
**Sent:** Thursday, October 06, 2016 2:09 PM  
**To:** Kumerow, Kirk  
**Subject:** [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Kirk,

I am not sure what the next major time consuming clearance will be. My guess is that the 8 step flood plain process is what I should be working on next. I am not familiar with this process so I will have to seek help. I did have a conversation with an engineer that has mapped the flood plain in the area of our project and their actual survey of the flood plain shows that our project is not really in the flood plain as is depicted by the FEMA maps. There are a few areas that appear to perhaps touch the road, but nothing covers the road as was shown in the FEMA maps. Is this data something that could be used and hopefully eliminate the need for the 8 step process.

I do have a much higher resolution file of the attached data, but the file is way too large to email. I would have to figure out another way to share it with you if it is needed. Also the second picture is a crude line that generally marks the road. The road can be seen on the first picture, but it is faint.

Thanks,

Cary

**From:** Kumerow, Kirk [<mailto:Kirk.Kumerow@illinois.gov>]  
**Sent:** Friday, September 16, 2016 11:06 AM  
**To:** 'caryminnis@greateregypt.org'  
**Cc:** [beauhenson@greateregypt.org](mailto:beauhenson@greateregypt.org); Wortman, David  
**Subject:** ERR for Pending Jefferson County CDBG-ED Project

Cary: Glad we talked this morning, and yes, the entire ERR process is something that takes 3 to 4 months, but won't hold up any CDBG-ED Grant award letter. In fact, the ERR requirement would be a "special condition" listed in any CDBG award letter, as a requirement to be satisfied before the eventual Grant Agreement is processed.

Specific to the next few days' tasks, the only two items of Federal environmental law that could possibly be fatal to a potential project, and may be in close proximity to the Continental Tire site and roadway improvements are: Floodways (where HUD funds or associated leverage cannot be committed) and Explosive and Flammable Hazards.

So, sometime next week, please e-mail me the FEMA Firmette and the Google Earth version of it, which the actual project locations (both road and factory improvements) marked on it. If the Google Earth version (instructions attached) clearly shows the project site is outside of the large nearby Floodway, then that hurdle will be removed. At a later date, you'll still have to perform an 8-step combined Floodplain and Wetlands Review (incl. both FEMA-required publications using the attached current version of the language HUD pushed out last Spring), but it wouldn't be Floodway prohibited if outside of it.

I've also attached a list of HUD "Specific Hazardous Substances", a sample completed HUD Explosives and Flammable Hazards (CEST and EA) worksheet, and a blank version for you to save and use. Continental will need to let you know if they "store, handle or process" any of those substances. If so, it must be noted on the worksheet, and you'll have to document that an Acceptable Separation Distance (ASD) is maintained between nearby residences and commercial properties and/or that mitigations are in place if the ASD is not met. Here's the HUD related environmental law web site(<https://www.hudexchange.info/programs/environmental-review/explosive-and-flammable-facilities/>) for that. Please save it to your browser as it will come in handy for this and future projects.

Those are the two items needed to verify upfront whether the project will be environmentally viable or not. All of the other bodies of State and Federal environmental law can then be documented by you and Beau over the next several months.

Unfortunately, my time is taken with other tasks for the rest of the day, but feel free to call or e-mail sometime next week if questions.

Kirk Kumerow  
CDBG Grants Manager/Environmental Review Officer  
Office of Community Development  
Illinois Department of Commerce and Economic Opportunity  
O: 217.558.2842  
[kirk.kumerow@illinois.gov](mailto:kirk.kumerow@illinois.gov)  
[www.illinois.gov/dceo](http://www.illinois.gov/dceo)



**Illinois**  
**Department of Commerce**  
*Illinois Economic Opportunity*  
**OFFICE OF COMMUNITY DEVELOPMENT**  
Bruce Rauner, Governor

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## Cary Minnis

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**From:** Kumerow, Kirk  
**Sent:** Wednesday, October 12, 2016 5:06 PM  
**To:** 'caryminnis@greateregypt.org'  
**Cc:** beauhenson@greateregypt.org; Goben, David; Wortman, David  
**Subject:** HUD Explosive and Flammable Hazards Worksheet for Jefferson County ED Project  
**Attachments:** Jefferson County ED HUD Explosive and Flammable Hazards Worksheet.pdf

**Flag Status:** Flagged

I've finally had time to review the Explosive and Flammable Hazards Worksheet that Continental Tire provided to you. While it contained a detailed listing of 7 types of chemicals/gasses stored and/or processed on-site, it wasn't filled out the right way.

I've attached a copy with my detailed notes, incl. where I circled 4 of the stored/processed substances on HUD's lists of explosive liquids and gases. It was a detailed response by the company, but they/you should really list all 7 of those stored/processed substances in the space under Question 1, answer it as "yes", and then go down to Question 5 (and possibly 6, depending on the answer to 5).

The good news is that after talking with my supervisor, Wendy Bell, she and I concur that if the new equipment to be installed by the company's project phase that will be tied in a Grant Agreement to the road improvements only involves the installation of new equipment in an existing structure, and there is no build footprint change (or other structure additions), then a Phase 1 ASTM survey by a licensed professional wouldn't be required. That is a requirement of HUD's if non-residential property is being acquired or developed with HUD (and/or leverage) funds. Installation of new equipment in an existing unchanged building wouldn't be considered "development".

I believe I'm now caught up on all of your ED ERR questions posed from late last week onwards. So far the road project has passed all of the potentially fatal environmental hurdles.

Kirk Kumerow  
CDBG Grants Manager/Environmental Review Officer  
Office of Community Development  
Illinois Department of Commerce and Economic Opportunity  
O: 217.558.2842  
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[www.illinois.gov/dceo](http://www.illinois.gov/dceo)



**Illinois**  
**Department of Commerce**  
Economic Opportunity  
**OFFICE OF COMMUNITY DEVELOPMENT**  
Bruce Rauner, Governor

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# Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271  
<http://dnr.state.il.us>

Bruce Rauner, Governor

Wayne Rosenthal, Director

October 04, 2016

Cary Minnis  
Greater Egypt Regional Planning and Development Commission  
3000 West Deyoung St. Suite 800B-3  
Marion, IL 62959

**RE: Jefferson County Road Improvements**  
**Project Number(s): 1702473**  
**County: Jefferson**

Dear Applicant:

This letter is in reference to the project you recently submitted for consultation. The natural resource review provided by EcoCAT identified protected resources that may be in the vicinity of the proposed action. The Department has evaluated this information and concluded that adverse effects are unlikely. Therefore, consultation under 17 Ill. Adm. Code Part 1075 and 1090 is terminated.

However, strict adherence to best management practices for erosion and sedimentation control should be used to minimize the possibility of any adverse impacts to vicinity wetlands and streams.

Consultation for Part 1075 is valid for two years unless new information becomes available that was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the project has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary. Consultation for Part 1090 (Interagency Wetland Policy Act) is valid for three years.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database and the Illinois Wetlands Inventory at the time of the project submittal, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, you must comply with the applicable statutes and regulations. Also, note that termination does not imply IDNR's authorization or endorsement of the proposed action.

Please contact me if you have questions regarding this review.

Sheldon Fairfield  
Division of Ecosystems and Environment  
217-785-5500

**Applicant:** Greater Egypt Regional Planning and Development Commission      **IDNR Project Number:** 1702473  
**Contact:** Cary Minnis      **Date:** 09/01/2016  
**Address:** 3000 West Deyoung St. Suite 800B-3  
Marion, IL 62959  
**Project:** Jefferson County Road Improvements  
**Address:** General Tire Road, Mt Vernon

**Description:** This project is located in Jefferson County just outside of the City of Mt. Vernon, Illinois. The project is to improve an existing roadway to serve a new industrial development in the County.

### Natural Resource Review Results

#### Consultation for Endangered Species Protection and Natural Areas Preservation (Part 1075)

The Illinois Natural Heritage Database contains no record of State-listed threatened or endangered species, Illinois Natural Area Inventory sites, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the project location.

#### Wetland Review (Part 1090)

The Illinois Wetlands Inventory shows wetlands within 250 feet of the project location.

An IDNR staff member will evaluate this information and contact you to request additional information or to terminate consultation if adverse effects are unlikely.

#### Location

The applicant is responsible for the accuracy of the location submitted for the project.

**County:** Jefferson

**Township, Range, Section:**

3S, 3E, 4

3S, 3E, 9



**IL Department of Natural Resources**  
**Contact**  
Sheldon Fairfield  
217-785-5500  
Division of Ecosystems & Environment

**Government Jurisdiction**  
IL Department of Commerce and Economic  
Opportunity  
David Wortman  
500 E Monroe Street  
Springfield, Illinois 62701

#### Disclaimer

The Illinois Natural Heritage Database cannot provide a conclusive statement on the presence, absence, or condition of natural resources in Illinois. This review reflects the information existing in the Database at the time of this inquiry, and should not be regarded as a final statement on the site being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are encountered during the project's implementation, compliance with applicable statutes and regulations is required.





U.S. Fish &amp; Wildlife Service

ECOS

[ECOS](#) / [Species Reports](#) / Species By County Report

## Species By County Report

The following report contains Species that are known to or are believed to occur in this county. Species with range unrefined past the state level are now excluded from this report. If you are looking for the Section 7 range (for Section 7 Consultations), please visit the [IPaC](#) application.

County: Jefferson, Illinois

[Download CSV](#)

Need to contact a FWS field office about a species? Follow [this link](#) to find your local FWS Office.

Group	Name	Population	Status	Lead Office	Recovery Plan	Recovery Plan Action Status	Recovery Plan Stage
Birds	Piping Plover ( <i>Charadrius melodus</i> )	Great Lakes, watershed in States of IL, IN, MI, MN, NY, OH, PA, and WI and Canada (Ont.)	Endangered	East Lansing Ecological Services Field Office	<a href="#">Recovery Plan for the Great Lakes population of Piping Plovers</a>	<a href="#">Implementation Progress</a>	Final
Mammals	Indiana bat ( <i>Myotis sodalis</i> )	Wherever found	Endangered	Bloomington Ecological Services Field Office	<a href="#">Indiana Bat (Myotis sodalis) Draft Recovery Plan: First Revision</a>	<a href="#">Implementation Progress</a>	Draft Revision 1
Mammals	Northern Long-Eared Bat ( <i>Myotis septentrionalis</i> )	Wherever found	Threatened	Twin Cities Ecological Services Field Office			

## Explosive and Flammable Hazards (CEST and EA)

General requirements	Legislation	Regulation
HUD-assisted projects must meet Acceptable Separation Distance (ASD) requirements to protect them from explosive and flammable hazards.	N/A	24 CFR Part 51 Subpart C
<b>Reference</b>		
<a href="https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities">https://www.hudexchange.info/environmental-review/explosive-and-flammable-facilities</a>		

1. Does the proposed HUD-assisted project include a hazardous facility (a facility that mainly stores, handles or processes flammable or combustible chemicals such as bulk fuel storage facilities and refineries)?

No

→ Continue to Question 2.

Yes

Explain:

→ Continue to Question 5.

2. Does this project include any of the following activities: development, construction, rehabilitation that will increase residential densities, or conversion?

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below.

Yes

→ Continue to Question 3.

3. Within 1 mile of the project site, are there any current or planned stationary aboveground storage containers:

- Of more than 100 gallon capacity, containing common liquid industrial fuels OR
- Of any capacity, containing hazardous liquids or gases that are not common liquid industrial fuels?

No

→ Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide all documents used to make your determination.

Yes

→ Continue to Question 4.

**4. Is the Separation Distance from the project acceptable based on standards in the Regulation?**

Please visit HUD's website for information on calculating Acceptable Separation Distance.

Yes

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the "assessed tank."*

No

→ *Provide map(s) showing the location of the project site relative to any tanks and your separation distance calculations. If the map identifies more than one tank, please identify the tank you have chosen as the "assessed tank." Continue to Question 6.*

**5. Is the hazardous facility located at an acceptable separation distance from residences and any other facility or area where people may congregate or be present?**

Please visit HUD's website for information on calculating Acceptable Separation Distance.

Yes

→ *Based on the response, the review is in compliance with this section. Continue to the Worksheet Summary below. Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations.*

No

→ *Provide map(s) showing the location of the project site relative to residences and any other facility or area where people congregate or are present and your separation distance calculations. Continue to Question 6.*

**6. For the project to be brought into compliance with this section, all adverse impacts must be mitigated. Explain in detail the exact measures that must be implemented to make the Separation Distance acceptable, including the timeline for implementation. If negative effects cannot be mitigated, cancel the project at this location.**

Note that only licensed professional engineers should design and implement blast barriers. If a barrier will be used or the project will be modified to compensate for an unacceptable separation distance, provide approval from a licensed professional engineer.

**Worksheet Summary**

**Compliance Determination**

Provide a clear description of your determination and a synopsis of the information that it was based on, such as:

- Map panel numbers and dates
- Names of all consulted parties and relevant consultation dates
- Names of plans or reports and relevant page numbers

Eight above-ground storage tank farms are located on the main Continental Tire manufacturing facility and within 1 mile of the PCT project. A summary with locations and ASD for Thermal Radiation is provided here:

1. #2 Fuel Oil Storage Tanks. 38°17'29.0"N 88°53'35.5"W  
Acceptable Separation Distances = 719.19' (people); 144.31' (buildings).
2. North Process Oil Tanks. 38°17'21.5"N 88°53'33.2"W  
Acceptable Separation Distances = 260.42' (people); 47.21' (buildings).
3. South Process Oil Tanks. 38°17'14.0"N 88°53'33.2"W  
Acceptable Separation Distances = 719.19' (people); 144.31' (buildings).
4. Used Oil & Resimene Storage Tanks. 38°17'17.3"N 88°53'33.7"W  
Acceptable Separation Distances = 138.69' (people); 23.54' (buildings).
5. Industrial Solvent (Naphtha) Storage Tank. 38°17'22.9"N 88°53'35.3"W  
Acceptable Separation Distances = 149.57' (people); 25.59' (buildings).
6. Twin 540-gallon Gasoline and Diesel double hull storage tanks. 38°17'32.0"N 88°53'31.3"W  
Acceptable Separation Distances = 213.95' (people); 37.82' (buildings).
7. Four, twinned, 1,000 gallon LP storage tanks. 38°17'20.3"N 88°53'35.6"W and 38.292065, -88.892034  
Acceptable Separation Distances (each)= 276.57' (people); 50.28' (buildings)

- Any additional requirements specific to your region

Are formal compliance steps or mitigation required?

No



All buildings to the north and west of the main Continental Tire manufacturing and warehousing facility house commercial activities with no above ground storage tanks.

**New PCT Manufacturing Facility (ex-Jung Warehouse)  
with 1 mile radius circle.**

Four, twinned, 1,000 gallon LP storage tanks

#2 Fuel Oil Storage Tank

Industrial Solvent (Naphtha) Storage Tank

Four, twinned, 1,000 gallon LP storage tanks

Used Oil & Resimene Storage Tanks

South Process Oil Tanks

PCT Building

Road to be Impro

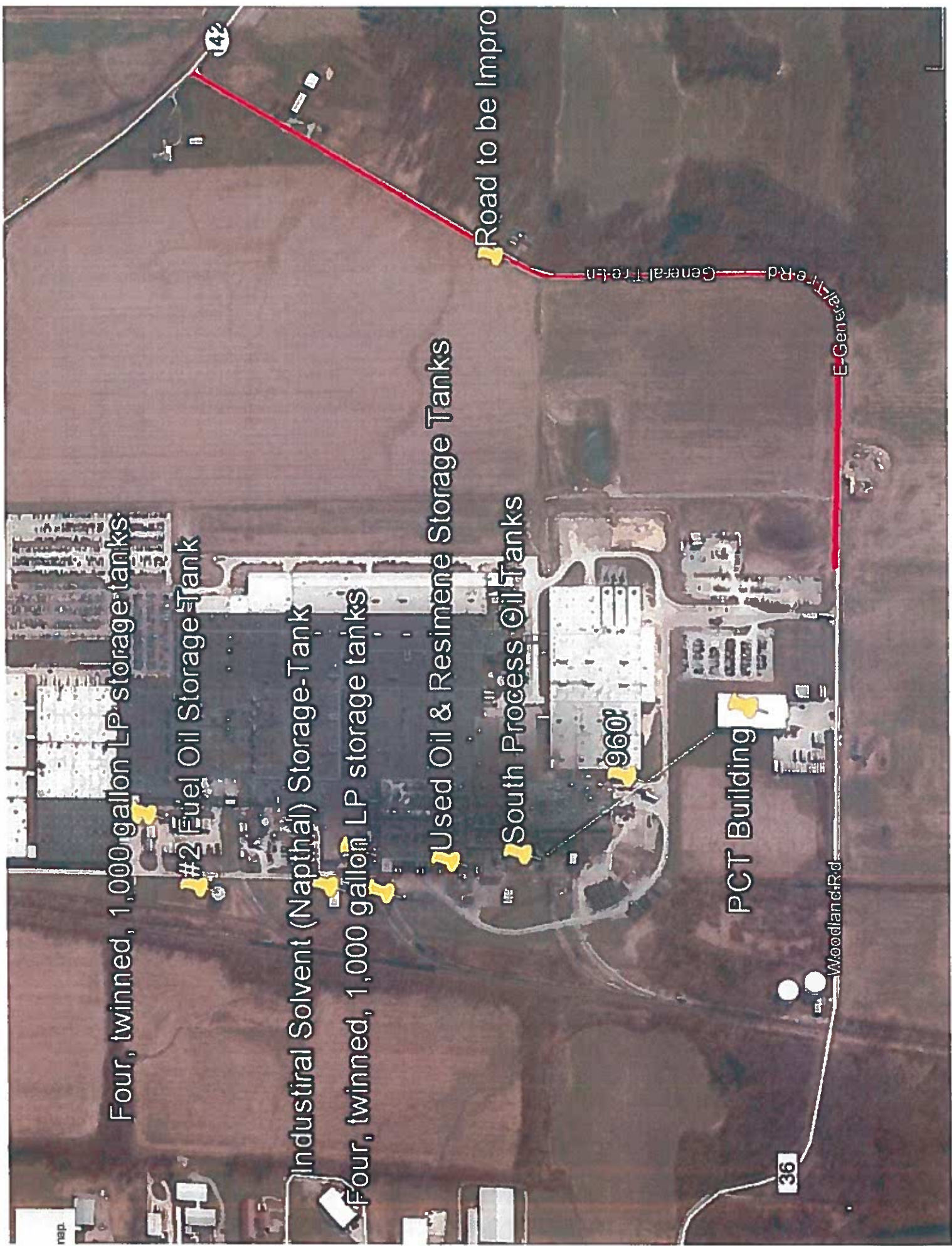
E-General Fre-ln

Woodland Rd

36

142

960'





### Need for Road Improvements

Traffic congestion and safety at the plant are major issues for our company. Depending on the time of day employees and deliveries can be delayed significantly due to the current configuration of the access. The improvements to General Tire lane will allow raw material delivery from route 142. This will give delivery carriers another option for accessing the plant allowing them to avoid congested areas. It will also allow us to disperse the vehicle traffic at shift change allowing employees to exit the plant at multiple locations thereby reducing congestion at the main plant entrance on Route 142. This will allow employees and truck traffic to enter and exit the facility much more efficiently and safely.

As we expand so do the issues related to delivery and employee congestion. Relieving the congestion will result in raw materials being delivered to the plant and our customers on time. If the delays are not addressed our manufacturing could be delayed or the final product could be delayed resulting in our customers not getting their products on time.

This project will also enhance safety by routing trucks away from the school zone at Route 37 and Woodland Drive where the trucks currently travel in addition to providing an alternate and shorter path from Route 142 to route 37 to access interstate 64.

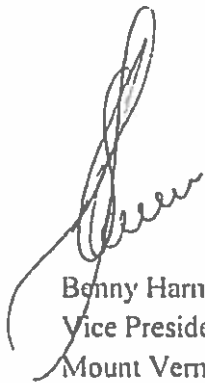
### Capital Expenditure

This latest expansion of the Mt. Vernon site is for a pre-cured tread manufacturing facility. This \$10,000,000 expansion will include making improvements to the existing building as well as purchasing and installing new equipment and other technology for pre-cured tread manufacturing and distribution.

Capital Expenditure Breakdown

The equipment breakdown is as follows:

Tread Press	\$4,857,936
Extruder	\$475,000
Sanding Unit	\$831,055
Conveyor System	\$116,766
Racking	\$221,066
Cooling Line	\$600,000
IT network/software	\$124,941
Mold Cleaning/Storage	\$911,135
Rework/Repair Line	\$92,111
Dust Collection System	\$36,844
Cement Applicator	\$148,955
Packaging unit/Roll/Stretch Wrapper	\$225,425
Electrical Distribution	\$399,147
Compressed Air, Cooling Tower, Oil System	\$386,770
Inspection Line	\$37,172
Other Small Items	\$535,677
<b>Total</b>	<b>\$10,000,000</b>



Benny Harmse  
Vice President, Manufacturing  
Mount Vernon, IL.  
Continental Tire the Americas, LLC

## Cary Minnis

---

**From:** Kumerow, Kirk  
**Sent:** Friday, November 04, 2016 11:27 AM  
**To:** 'caryminnis@greateregypt.org'  
**Cc:** Goben, David; Wortman, David  
**Subject:** FW: [External] RE: ERR for Pending Jefferson County CDBG-ED Project  
**Attachments:** DCEO 10-31-16.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Thanks Cary, and please thank Continental Tire for the added clarification. In my estimation, since the underlying project doesn't include building expansion or new building construction, the project cannot be construed as being "the acquisition or development of non-residential property", and thus a Phase I ASTM Report by a licensed professional will not be a requirement of its EA-level NEPA-compliance ERR.

Please place a copy of this e-mail chain (with Mr. Harmse's statement below highlighted) and the attached letter from Continental in the supporting docs. for the EA, along with the other "Contamination and Toxic Substances" supporting docs.

Thanks, Kirk (217-558-2842).

---

**From:** Cary Minnis [mailto:caryminnis@greateregypt.org]  
**Sent:** Thursday, November 03, 2016 11:52 AM  
**To:** Kumerow, Kirk  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Kirk,  
I have attached the letter from Continental that you requested and have copied the response to clarify that no new buildings or expansions of the existing building will be built through this project.

We will not be building any additional building in this phase. We will renovate the offices, paint the building etc. but no extension.

Best Regards

Benny

Benny Harmse  
Vice President, Manufacturing  
Mount Vernon, IL.  
Continental Tire the Americas, LLC

Thanks,

Cary Minnis

---

**From:** Kumerow, Kirk [mailto:Kirk.Kumerow@illinois.gov]  
**Sent:** Thursday, November 03, 2016 9:50 AM  
**To:** Cary Minnis



**Cc:** Goben, David; Wortman, David

**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

I'll look at it. Dave Goben briefly showed me a piece of paper from Continental outlining how they're proposing to spend \$10million on the project. Since you are the local environmental reviewer, could you please obtain a copy of that and e-mail it to me? If you could also include confirmation that a new building is not being built through the project, or that the existing buildings aren't being expanded through the project, then I could advise that a Phase I ASTM Survey by a licensed professional would not be required, because the project wouldn't be the acquisition or development of non-residential property.

On an un-related project, could you please give me an approximate date as to when the ERR for Village of Cutler #15-242011 will be submitted for review by the State? I'm with Margie for Beau a couple of days ago, and heard he was out of the office. There are only 3 outstanding PY'15 CDBG PI ERR's, and Cutler's is one of them. We're trying to wrap those three ASAP.

Thanks, Kirk (217-558-2842).

---

**From:** Cary Minnis [<mailto:caryminnis@greateregypt.org>]

**Sent:** Thursday, November 03, 2016 8:37 AM

**To:** Kumerow, Kirk

**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Kirk,

We are getting ready to publish the final floodplain/wetland notice. I wondered if you would look at this draft. We still have to get the publication date and the County Board Chair name, but the rest should be complete.

Thanks,

Cary

---

**From:** Kumerow, Kirk [<mailto:Kirk.Kumerow@illinois.gov>]

**Sent:** Wednesday, October 12, 2016 4:41 PM

**To:** 'caryminnis@greateregypt.org'

**Cc:** [beauhenson@greateregypt.org](mailto:beauhenson@greateregypt.org); 'margiemitchell@greateregypt.org'

**Subject:** FW: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Cary: All looked well by me. You even gave the public one extra day of public comment period by giving them until 10/30/16. If published on 10/14/16, the 15 full day comment period would be 10/15 to 10/29.

I would however add Mr. White's Complete title as Jefferson County Board Chairman.

Thanks.

---

**From:** Cary Minnis [<mailto:caryminnis@greateregypt.org>]

**Sent:** Wednesday, October 12, 2016 9:58 AM

**To:** Kumerow, Kirk

**Cc:** Beau Henson; Margie Mitchell

**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

I had the wetlands in the letter, but I went ahead and added a little more specifics based on the IDNR response. We also have a publication date in this version. For this to be accurate we have to get it to the newspaper by 5:00pm today.

Thanks,

Cary

---

**From:** Kumerow, Kirk [mailto:[Kirk.Kumerow@illinois.gov](mailto:Kirk.Kumerow@illinois.gov)]  
**Sent:** Wednesday, October 12, 2016 10:03 AM  
**To:** Cary Minnis  
**Cc:** Beau Henson  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Cary: Please see my highlighted language below. Since DNR has imposed one of the Wetlands conditions I reference below, you'll need to revised the language to also include Wetlands and send it back to me for review. I didn't review it once I saw you stated Wetlands language had been eliminated.

I reviewed the Toxic and Hazardous Worksheet yesterday, and will send it to you today with corrections. Thanks, Kirk (217-558-2842).

---

**From:** Cary Minnis [mailto:[caryminnis@greateregypt.org](mailto:caryminnis@greateregypt.org)]  
**Sent:** Friday, October 07, 2016 3:26 PM  
**To:** Kumerow, Kirk  
**Cc:** Beau Henson  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

It appears that this is all that needs to be published. Does this look right? I left wetlands since the letter from IDNR made the statement below. I will add the dates as soon as we know when we can publish.

Thanks,

Cary

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**From:** Cary Minnis [mailto:[caryminnis@greateregypt.org](mailto:caryminnis@greateregypt.org)]  
**Sent:** Friday, October 07, 2016 10:16 AM  
**To:** 'Kumerow, Kirk'  
**Cc:** Beau Henson  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

It looks like they did include the statement about best practices.  
"However, strict adherence to best management practices for erosion and sedimentation control should be used to minimize the possibility of any adverse impacts to vicinity wetlands and streams."

---

**From:** Kumerow, Kirk [mailto:[Kirk.Kumerow@illinois.gov](mailto:Kirk.Kumerow@illinois.gov)]  
**Sent:** Friday, October 07, 2016 10:05 AM  
**To:** Cary Minnis  
**Cc:** [beauhenson@greateregypt.org](mailto:beauhenson@greateregypt.org)  
**Subject:** RE: [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Cary: FEMA FIRMettes are the authoritative source for HUD on whether a proposed project is in a flood plain or not, so I didn't look on the attachment in great detail. Since the previously reviewed FEMA maps showed portions of the project are in a 100-year FP, an 8-step FP review (incl. both FEMA-required publications and local public comment periods) must be performed.

To help guide you, I've attached a sample completed EA-level ERR that included an 8-step FP review. I reviewed and approved that ERR for a PY'15 rural water extension grant earlier this year. Please ignore its Exemption docs, because

they are on the older HUD forms, and not on the current HUD ER for an Exempt-CENST Activity form. I've also attached the current HUD format language for the two FEMA FP publications (they must be published, and not posted). They also include language for Wetlands (if a wetland is impacted). If DNR wholly determined a nearby Wetland wasn't affected, then you'd drop the Wetlands language. If DNR requires 1:1 mitigation or "best management practices for erosion and sedimentation control" to protect a nearby wetland, then you'd have to incl. reference to Wetlands in both FP publications as well.

Here's HUD's Floodplain Management link:

<https://www.hudexchange.info/programs/environmental-review/floodplain-management/>

Where they've listed the why's and how's.

The only other lengthy time period for gathering supporting docs. for an EA level review is the 30 or 35 day tribal consultation period. Since Beau of your staff recently completed one for the Village of Cutler, I'll let him guide you through that process. It's timeframe and those for the 8-step FP review can overlap. The key is that all supporting docs. for the 16 bodies of Federal environmental law (<https://www.hudexchange.info/environmental-review/federal-related-laws-and-authorities/>) that must be satisfied for HUD funding must be completed and documented in their entirety before you and the County Board Chairman sign and date the project's Environmental Assessment (EA) form.

Thanks, Kirk (217-558-2842).

---

**From:** Cary Minnis [<mailto:caryminnis@greateregypt.org>]  
**Sent:** Thursday, October 06, 2016 2:09 PM  
**To:** Kumerow, Kirk  
**Subject:** [External] RE: ERR for Pending Jefferson County CDBG-ED Project

Kirk,

I am not sure what the next major time consuming clearance will be. My guess is that the 8 step flood plain process is what I should be working on next. I am not familiar with this process so I will have to seek help. I did have a conversation with an engineer that has mapped the flood plain in the area of our project and their actual survey of the flood plain shows that our project is not really in the flood plain as is depicted by the FEMA maps. There are a few areas that appear to perhaps touch the road, but nothing covers the road as was shown in the FEMA maps. Is this data something that could be used and hopefully eliminate the need for the 8 step process.

I do have a much higher resolution file of the attached data, but the file is way too large to email. I would have to figure out another way to share it with you if it is needed. Also the second picture is a crude line that generally marks the road. The road can be seen on the first picture, but it is faint.

Thanks,

Cary

---

**From:** Kumerow, Kirk [<mailto:Kirk.Kumerow@illinois.gov>]  
**Sent:** Friday, September 16, 2016 11:06 AM  
**To:** 'caryminnis@greateregypt.org'  
**Cc:** [beauhenson@greateregypt.org](mailto:beauhenson@greateregypt.org); Wortman, David  
**Subject:** ERR for Pending Jefferson County CDBG-ED Project

Cary: Glad we talked this morning, and yes, the entire ERR process is something that takes 3 to 4 months, but won't hold up any CDBG-ED Grant award letter. In fact, the ERR requirement would be a "special condition" listed in any CDBG award letter, as a requirement to be satisfied before the eventual Grant Agreement is processed.

Specific to the next few days' tasks, the only two items of Federal environmental law that could possibly be fatal to a potential project, and may be in close proximity to the Continental Tire site and roadway improvements are: Floodways (where HUD funds or associated leverage cannot be committed) and Explosive and Flammable Hazards.

So, sometime next week, please e-mail me the FEMA Firmette and the Google Earth version of it, which the actual project locations (both road and factory improvements) marked on it. If the Google Earth version (instructions attached) clearly shows the project site is outside of the large nearby Floodway, then that hurdle will be removed. At a later date, you'll still have to perform an 8-step combined Floodplain and Wetlands Review (incl. both FEMA-required publications using the attached current version of the language HUD pushed out last Spring), but it wouldn't be Floodway prohibited if outside of it.

I've also attached a list of HUD "Specific Hazardous Substances", a sample completed HUD Explosives and Flammable Hazards (CEST and EA) worksheet, and a blank version for you to save and use. Continental will need to let you know if they "store, handle or process" any of those substances. If so, it must be noted on the worksheet, and you'll have to document that an Acceptable Separation Distance (ASD) is maintained between nearby residences and commercial properties and/or that mitigations are in place if the ASD is not met. Here's the HUD related environmental law web site(<https://www.hudexchange.info/programs/environmental-review/explosive-and-flammable-facilities/>) for that. Please save it to your browser as it will come in handy for this and future projects.

Those are the two items needed to verify upfront whether the project will be environmentally viable or not. All of the other bodies of State and Federal environmental law can then be documented by you and Beau over the next several months.

Unfortunately, my time is taken with other tasks for the rest of the day, but feel free to call or e-mail sometime next week if questions.

Kirk Kumerow  
CDBG Grants Manager/Environmental Review Officer  
Office of Community Development  
Illinois Department of Commerce and Economic Opportunity  
O: 217.558.2842  
[kirk.kumerow@illinois.gov](mailto:kirk.kumerow@illinois.gov)  
[www.illinois.gov/dceo](http://www.illinois.gov/dceo)



**Illinois**  
**Department of Commerce**  
*is Economic Opportunity*  
**OFFICE OF COMMUNITY DEVELOPMENT**  
Bruce Rauner, Governor

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## Cary Minnis

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**From:** Kumerow, Kirk  
**Sent:** Wednesday, October 12, 2016 5:06 PM  
**To:** 'caryminnis@greateregypt.org'  
**Cc:** beauhenson@greateregypt.org; Goben, David; Wortman, David  
**Subject:** HUD Explosive and Flammable Hazards Worksheet for Jefferson County ED Project  
**Attachments:** Jefferson County ED HUD Explosive and Flammable Hazards Worksheet.pdf

**Flag Status:** Flagged

I've finally had time to review the Explosive and Flammable Hazards Worksheet that Continental Tire provided to you. While it contained a detailed listing of 7 types of chemicals/gasses stored and/or processed on-site, it wasn't filled out the right way.

I've attached a copy with my detailed notes, incl. where I circled 4 of the stored/processed substances on HUD's lists of explosive liquids and gases. It was a detailed response by the company, but they/you should really list all 7 of those stored/processed substances in the space under Question 1, answer it as "yes", and then go down to Question 5 (and possibly 6, depending on the answer to 5).

The good news is that after talking with my supervisor, Wendy Bell, she and I concur that if the new equipment to be installed by the company's project phase that will be tied in a Grant Agreement to the road improvements only involves the installation of new equipment in an existing structure, and there is no build footprint change (or other structure additions), then a Phase 1 ASTM survey by a licensed professional wouldn't be required. That is a requirement of HUD's if non-residential property is being acquired or developed with HUD (and/or leverage) funds. Installation of new equipment in an existing unchanged building wouldn't be considered "development".

I believe I'm now caught up on all of your ED ERR questions posed from late last week onwards. So far the road project has passed all of the potentially fatal environmental hurdles.

Kirk Kumerow  
CDBG Grants Manager/Environmental Review Officer  
Office of Community Development  
Illinois Department of Commerce and Economic Opportunity  
O: 217.558.2842  
[kirk.kumerow@illinois.gov](mailto:kirk.kumerow@illinois.gov)  
[www.illinois.gov/dceo](http://www.illinois.gov/dceo)



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**Department of Commerce**  
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OFFICE OF COMMUNITY DEVELOPMENT  
Bruce Rauner, Governor

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## Kumerow, Kirk

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**From:** Beau Henson <BeauHenson@greateregypt.org>  
**Sent:** Tuesday, March 21, 2017 2:33 PM  
**To:** Kumerow, Kirk  
**Subject:** [External] Jefferson County - ERR - Part Two  
**Attachments:** No Reply @ Greater Egypt Scans.pdf

attached

-----Original Message-----

**From:** [greateregyptscans@gmail.com](mailto:greateregyptscans@gmail.com) [<mailto:greateregyptscans@gmail.com>]  
**Sent:** Tuesday, March 21, 2017 2:54 PM  
**To:** Beau Henson <[beauhenson@greateregypt.org](mailto:beauhenson@greateregypt.org)>  
**Subject:** No Reply @ Greater Egypt Scans

Please open the scanned document from a Xerox WorkCentre 7535.

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multifunction device Location: machine location not set  
Device Name: Xerox7535