



Request for Bids

BID #2025-19

for

**Demolition and Asbestos Abatement Services of Former
Pool 13 Building Located at 613 Broderick Drive**

Contact:

Jeff Griswold

Public Works Superintendent

815-273-2251

j.griswold@savanna-il.us

Bid Number: 2025-19

Bid Issue Date: March 20th, 2026

Bid Due: Tuesday, April 7th, 2026, at 10:29am (CT)

Bid Opening Date: Tuesday, April 7th, 2026, at 10:30am (CT)

INVITATION TO BID
Demolition and Asbestos Abatement of Building
Located at 613 Broderick Drive
CITY OF SAVANNA, IL

Sealed bids must be marked “Bid #2025-19 – Demolition and Asbestos Abatement of Building Located at 613 Broderick Drive” and submitted to City Hall, City of Savanna, 333 Chicago Ave, Savanna, Illinois 61074, by 10:30 a.m., Tuesday, April 7th, 2026, for the demolition and asbestos abatement services of form Pool 13 Building at 613 Broderick Drive in the City of Savanna, after which, at 10:30 a.m. bids will be opened publicly and read aloud. Expected bid award at City Council meeting on April 14, 2026 at 6:00pm. The bid documents may be obtained from the City of Savanna, Public Works Department located at 333 Chicago Ave, Savanna, Illinois 61074, Monday through Friday, 8:30am to 4:30pm or online at https://www.savannail.us/city_of_savanna/bid_rfp_opportunities.php.

The City of Savanna reserves the right to waive any informality or technicality and to reject any or all bids. All work must be done in accordance with all City of Savanna Ordinances.

Expected Notice to Proceed upon approval of demolition permit, performance bond, and after completion of mandatory pre-demolition meeting with City of Savanna Public Works Superintendent.

Bidders will be required to comply with the Prevailing Wage Act (820ILCS 130/0.01 et seq.). The Act requires contractors and subcontractors to pay their laborers and mechanics employed under the contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area. Therefore, the contractor and each subcontractor shall pay as a minimum the wages set forth as indicated on the Illinois – Carroll County Prevailing Wage Rates.

Questions about the project, specifications, gaining access to the project, or the bidding process may be directed to Jeff Griswold, Public Works Superintendent, (815) 273-2251.

GENERAL INSTRUCTIONS TO BIDDERS

GENERAL STATEMENT

It is proposed under the specifications herein to provide for furnishing and delivering all necessary equipment, material and/or labor as set forth in the attached specifications.

PURPOSE OF SPECIFICATIONS

The purpose of these specifications is to require the furnishing of highest quality equipment, material, and/or workmanship in accordance with these specifications and best practice. If any bidder submitting a proposal believes, from his or her experience, that the specifications are not consistent with this intent, he or she shall submit an alternate proposal on the part or parts of the proposal which he or she believes to be contrary to the best practice. The City, in allowing this, in no way infers that such deviations shall be accepted. However, consideration will be given.

TERMS DEFINED

Whenever in these specifications the term "City" is employed, it is understood to refer to the City of Savanna. Whenever the term "Contractor" is employed, it is understood to refer to the person, partnership, or corporation that may have entered into a contract with the City to furnish the equipment, material, and/or labor specified herein.

BIDS:

Bids shall be made by filling out the proposal form attached to these specifications in detail and delivering to the City all the all the specifications in a sealed envelope, marked with Bidder's name and "Bid #2025-19– Demolition and Asbestos Abatement of 613 Broderick Drive" on the cover. Each bid must be headed by the name of the Bidder and his or her mailing address, signed by said Bidder, and in case the bid is made by a corporation, the same shall be signed by a legally authorized agent of the corporation. The City reserves the right to reject any and all bids. The City also has the ability to "pick and choose" bids as it sees fit.

Bidders are instructed to familiarize themselves with the work contemplated in order that the true spirit and intent of the specifications may be fulfilled. In the case where the Bidder feels the specifications are deficient or not clearly defined, the parties submitting proposals must request from the City any necessary additional information.

USE OF SEPARATE BID FORMS:

The Contract Documents include a complete set of Bidding and Contract forms which are for the convenience of Bidders and are not to be detached from the Contract Documents or filled out or executed. Separate copies of the Bidding and Contract forms are furnished for that purpose.

WITHDRAWAL OF BID:

No Bidder may withdraw his or her bid for a period of fifteen (15) days from the date of opening bids.

PREVAILING WAGE:

Bidders will be required to comply with the Prevailing Wage Act (820ILCS 130/0.01 et seq.). The Act requires contractors and subcontractors to pay their laborers and mechanics employed under the

contract no less than the locally prevailing wages and fringe benefits for corresponding work on similar projects in the area. Therefore, the contractor and each subcontractor shall pay as a minimum the wages set forth as indicated on the Illinois – Carroll County Prevailing Wage Rates.

STATEMENT OF BIDDER'S QUALIFICATIONS:

Each bidder shall submit on the form furnished for that purpose, a copy of which is included in the contract documents, a statement of Bidder's qualifications, his or her demolition experience, and his or her organization and equipment available for the work contemplated. The City shall have the right to take such steps as it deems necessary to determine the ability of the Bidder to perform his or her obligations under the Contract, and Bidder shall furnish all information requested by City for this purpose as it may request. The right is reserved to reject any bidder where an investigation of available evidence or information does not satisfy the City that the Bidder is qualified to carry out properly the terms of the Contract.

CORRECTIONS OR CHANGES:

Errors or other changes in bid must be explained and noted over each signature bidder.

AWARD OF CONTRACTS/REJECTION OF BIDS:

The Contract will be awarded to lowest responsible bidder complying with all Bidding Documents. The City reserves right to reject any and all bids and to waive any informality in bids received whenever such rejection or waiver is in its interest. The Bidder whom award is made will be notified at earliest practicable date.

DETAILED INSTRUCTIONS TO BIDDERS:

SCOPE:

It is the intent of these instructions to provide for the demolition and site clearance of the identified structure. See **Appendix C** for Site Plan.

EXTENT OF CONTRACT:

The Successful Bidder shall furnish all supervision, labor, tools, equipment, and local permits necessary to complete the project to the satisfaction of the City. As previously stated, all Bidders should visit the job site at Contractor's risk and expense to familiarize themselves with the job.

COMPLETION TIME:

All demolition and site clearance activities shall be completed within sixty (45) working days, beginning from Contractor's receipt of an approved City Demolition Permit. There are no permit fees being charged to contractors in association with bid awarded projects.

LIQUIDATED DAMAGES:

There is a fee in this project. In the event that Contractor exceeds completion time stated above, there shall be assessed against Contractor liquidated damages in the amount of \$1,000.00 per day for each calendar day or portion thereof until work is completed. The Contractor may request an extension from the City if project can not feasibly be completed within sixty (60) working days. The Contractor must submit a written request to the City, noting the length of the extension necessary to complete the project and reason for the need of an extension.

ACCIDENT PREVENTION: The Contractor shall always exercise proper precaution for safety on or near work sites during operations or performance under this agreement. All operations shall be conducted so there is no unnecessary interference with access to buildings adjacent to or within areas where work is being performed. Contractors need to coordinate heavy equipment transportation on local roads and side streets with the Public Works Superintendent.

All contractors must submit with their bids a certificate of insurance in the following amounts:

Manufacturer's and Bidder's Public Liability Insurance

| | |
|-----------------------|-------------|
| Bodily Injury | \$1,000,000 |
| Property Damage | \$1,000,000 |

Additionally, proof of Worker's Compensation Insurance must be submitted with the bid.

DETAILED SCOPE OF WORK:

The successful Bidder shall abate asbestos containing material and completely dismantle or demolish the entire structure down to the existing foundation grade. The Contractor shall remove all yard debris and excavation shall be filled to level of existing ground at existing foundation grade.

All foundation/concrete must be removed completely according to local ordinance with exception of the foundation pilings below grade level. Finished grade shall be seeded.

SEDIMENT CONTROL FENCE/SILT FENCE:

Sediment control fence shall be made of Mirafi 100 sediment control fabric, backed by industrial polypropylene netting, manufactured by Dominion Textile Company, or equal. The fabric shall come in rolls of 3' width. Posts used to support the fabric shall be at least 2" x 2" in cross-section. Silt Fence may also be accepted according to ILDOT Article 280.

ASBESTOS REMOVAL:

As part of the bid documents, the City of Savanna has completed an asbestos survey. The asbestos inspection reports are included with this bid. Prior to demolition, the successful contractor is responsible for any required asbestos abatement from the structure, as required under state and federal law. All related EPA notices and the 10-day notification of demolition required by the EPA must be sent to the Illinois Environmental Protection Agency at the contractor's own expense, and a copy provided to the City before demolition. A fee of \$150 is to be paid by the contractor to the Illinois EPA with each initial 10-working day notice required to be filed to perform demolition of asbestos containing structures. When asbestos abatement is required, confirmation must be provided to the City, by the licensed asbestos abatement contractor, that the abatement has been completed prior to the beginning of any demolition. The licensed State of Illinois Asbestos Abatement Contractor shall remove and dispose of any identified asbestos in accordance with OSHA, EPA, DNR, Federal, State and local requirements. The City may request, and the bidder must furnish, proof of current state license and necessary insurance for the selected Asbestos Abatement Contractor. All contractors are required to submit (when applicable) copies of the EPA 10-day notice, the EPA Hazardous Waste Shipment/Asbestos Manifest, Asbestos Waste Dump Receipts, and the Dump Receipts for the demolition debris.

Refer to the NESHAP regulation 40 CFR 61 subpart M and OSHA 29 CFR 1926.1101 for rules concerning renovation and demolition activities. Any questions should be directed to the NESHAP coordinator at the Illinois EPA (217) 785-2011 in Springfield, the Region 5 USEPA (312) 353-2000 in Chicago or the Illinois Department of Public Health (217) 782-3517 in Springfield.

In the event of a complex demolition, asbestos abatement and demolition may occur simultaneously provided proper safety procedures are followed and no asbestos containing materials are demolished prior to abatement.

REMOVAL OF DEBRIS:

All rubbish and debris found on the lot at the start of work as well as that resulting from the demolition activities or deposited on the site by others during the duration of the Contract shall be removed and legally disposed of by the Contractor, who shall always keep the lots and public rights-of-way reasonably clear. Upon completion of the work, the Contractor shall remove any and all temporary construction equipment and debris of all kinds leaving each lot in a neat condition. Trash burning is not permitted. Perishable materials must not become a part of any fill placed or

left on the site. The bidder shall use an approved dumpsite for depositing of all inert materials. Dump receipts must be retained and submitted to the City of Savanna prior to any pay requests being processed.

DISPOSAL OF MATERIAL:

Each bidder shall provide within their bid, the location where the debris from this demolition will be dumped. State licensed site(s) for dumping rubble or any other private site where clean debris will be accepted shall be listed. The bidder shall leave the premises in such condition that it will not constitute a public nuisance.

UTILITIES:

Prior to the beginning of all demolition work, the contractor shall work with the city and await confirmation through the city permit approval process, that all utilities have been disconnected to the structure. Contractors will be responsible for locating and capping residential service sewer laterals. Capping methods used must meet city code requirements.

TREES:

With preapproval, small trees, shrubs, or bushes that interfere with demolition work may be removed by the contractor and taken to a drop site within city limits. If large tree removal is required, the city will contract tree removal directly with a 3rd party contractor specialized in tree removal. Bids for demolition work should not include costs for tree removal.

PROPERTY ACCESS:

The city requests preapproval for all instances of contractors running heavy equipment on city streets. The city acknowledges that some locations may be difficult to access with heavy equipment. To minimize damage to local roads, it is the city's charge to keep heavy equipment off the local roads. However, when requested, special circumstances can and will be approved on a case-by-case basis.

DEPARTMENT REVIEW AND INSPECTION:

The City, its authorized representatives and agents shall, at all times, have access to and be permitted to observe and review all work, materials, equipment, payrolls, employment conditions, and other relevant data pertaining to the contract.

Prior to Notice to Proceed, a Pre-Demolition Meeting is to be held with the City of Savanna's Public Works Superintendent.

FILL:

All basements, hole excavation, or ruts no matter what the cause shall be filled with "select fill"; to be secured by the Contractor and subject to the following:

- a. Concrete blocks, masonry or other rubble from the demolished structures or any organic materials may not be used as fill within the lots.

b. All foundation/concrete must be removed completely or according to local ordinance (with exception of foundation material in the riverbank). All lots will be graded level with the remaining lot area. All basements or other depressions, holes, excavations, or ruts shall be cleared of all debris before filling operations are undertaken and the floors of basements, wells, cisterns, septic tanks and laterals, or similar installations shall be thoroughly broken up and removed. As noted, all structures of any nature shall be demolished on the sites and the rubbish and debris therefrom removed from the sites for disposal to a point outside the project sites. Dump tickets from the approved EPA landfill shall be required as proof of legal dumping, prior to payments. Removal of such demolition material, equipment, rubbish, and debris shall be done as orderly and rapidly as conditions will permit. If necessary, all trucks will be covered to prevent excessive dust or falling litter. The Contractor shall execute the work in such a manner as to avoid unnecessary interference with the use of the public of the adjacent sidewalks, streets, alleys, and other public rights-of-way. If the dust raised by the demolition is excessive, a stream of water shall be sprayed on the structure(s) during the demolition. The Contractor shall be responsible for obtaining consent of the appropriate agency if a fire hydrant is utilized to supply water.

SPECIFICATIONS FOR SEEDING

1. GENERAL

Seeding as described below shall be performed as soon as the ground is prepared. Not earlier than twenty-four (24) hours before seeding, the soil surface shall be worked to a depth of not less than 2 inches with a weighted disk road tiller, pulvimixer, rake or other suitable equipment until the surface is smooth and free from debris, washed, gullies, clods and stones and shall be in such smooth condition at time of seeding.

2. FERTILIZING

Fertilizer containing 12 percent nitrogen, 12 percent phosphorus and 12 percent potash (12-12-12 analysis) shall be applied to the area to be seeded at the rate of 25 pounds per 1,000 square feet.

3. SEED SOWING

The area to be seeded shall be smoothed by dragging with an approved type of plank drag or rake and shall be sown at a mowable grade. As soon as the area is smooth, the permanent turf crop shall be sown.

The permanent turf crop shall be sown with Kentucky Blue Grass at four (4) pounds per 1,000 square feet. Use only in entophyte free.

4. MULCHING

Within twenty-four (24) hours from time of seeding, the seeded area shall be given a covering of straw at the rate of approximately 100 pounds per 1,000 square feet. The straw shall be loose enough to permit air to circulate but compact enough to reduce erosion. Care should be taken that the material is in a loosened condition and contains no lumps or knots of compacted material.

The Contractor shall be responsible for the proper care of the seeded area during the period of when the grass is becoming established-any seeded area that does not produce a suitable stand of grass shall be re-seeded as specified above.

On completion of all seeding operations, the Contractor shall remove all debris, excess materials, etc., as caused by his work and leave the premises neat and clean.

WORK TIME:

All work **shall** be performed during the hours of 8:00a.m. - 5:00p.m., Monday through Friday. **No** work will be approved if conducted before 8:00a.m., or after 5:00p.m. or on weekends, or on the following holidays:

| | |
|------------------------|-----------------------------------|
| New Year's Day | Independence Day |
| Martin Luther King Day | Labor Day |
| Presidents' Day | Veteran's Day |
| Good Friday | Thanksgiving Day |
| Memorial Day | Friday Following Thanksgiving Day |
| Juneteenth | Christmas Day |

Contractors will not be compensated for any and all unapproved work.

CITY INSPECTOR:

Contractors are required to cooperate with the City Public Works Superintendent who may from time to time determine and require the use of a stream of water if the dust is excessive, the use of a covering over the trucks as well as other matters relating to the demolition project.

SUBMISSION INSTRUCTIONS:

Sealed bids should be submitted no later than **10:29am on, Tuesday, April 7th, 2026**, to:

City of Savanna
Bid #2025-19
Attention: Public Works Superintendent
333 Chicago Ave,
Savanna, Illinois 61074

**CITY OF SAVANNA BID #2025-19 – DEMOLITION AND
ASBESTOS ABATEMENT OF BUILDING LOCATED AT 613
BRODERICK DRIVE
COVER SHEET/CHECK LIST**

BIDDER _____

BUSINESS NAME _____

BUSINESS EMAIL _____

BUSINESS PHONE _____

IMPORTANT:

BIDS WILL NOT BE RECEIVED WITHOUT THIS CHECKLIST COMPLETED THERE WILL BE NO EXCEPTIONS!

1. ___ Cover Sheet/Check List (attached)
2. ___ Proposal Sheet (attached)
3. ___ Bid Bond (for 5% of bid amount)
4. ___ Statement of Bidder's Qualifications (attached)
5. ___ Certificate of Insurance (with required levels)
6. ___ Bid Sheet (attached)

I hereby certify that the above items are included in this bid packet as submitted on this ____ day of _____ 20____

Signature of Bidder with demolition contractor's name

_____ Date _____

Above items 1-6 must be submitted in the sealed envelope per instructions. Any questions should be directed To: Jeff Griswold at j.griswold@savanna-il.us.

To Be Submitted After Award and Prior to Notice to Proceed

___ Proof of **ALL** local permits

___ Performance Bond (For 100% of bid amount)

PROPOSAL

City of Savanna, Illinois

To furnish as specified herein;

The demolition of structures for the **City of Savanna – BID #2025-19 – Demolition and Asbestos Abatement of Building Located at 613 Broderick Drive**

For the City of Savanna, State of Illinois

Name of Bidder: _____

Street Address of Bidder: _____

(NO P.O. Boxes)

To City of Savanna:

The undersigned as a bidder declares: That he or she has been regularly engaged in contract work of the class required by the specification for _____ years and hereby submits this proposal.

Signature of Bidder: _____

Print Name of Demolition Contractor/Company: _____

The undersigned submits with this proposal all information as called for. The undersigned, as a Bidder, hereby declares that the only person or persons interested in the proposal as principal or principals is or are named herein and that person herein mentioned has any interest in this proposal of the contract to be entered into: that this proposal is made without connection with any other person, company, or parties making a bid proposal; and that it is in all respects fair and in good faith without collusion or fraud.

If written notice of the acceptance of this bid is mailed, telegraphed, or delivered to the undersigned within thirty (30) days after the date of the bid is mailing, telegraph, or delivery of such notice, execute and deliver a Contract attached.

The undersigned designates as his office to which such notice acceptance may be mailed, faxed or delivered:

This Bid may be withdrawn at any time prior to the scheduled time for the opening of the Bids or any authorized postponement thereof.

Signature of Bidder: _____

By: _____ (Please print)

Title: _____

Street Address of Bidder: _____

(NO P.O. BOXES)

Date: _____

BID SHEET

COST FOR CITY OF SAVANNA BID #2025-19 – Demolition and Asbestos Abatement of Building Located at 613 Broderick Drive.

| PROPERTY ADDRESS | PIN | PRICE |
|------------------------------------|--------------|-------|
| 613 Broderick Dr Savanna, IL 61074 | 080704403005 | \$ |

*CONTAINS ASBESTOS (SEE APPENDIX B)

Name of Disposal Site: _____

Location of Disposal Site: _____

Name of Licensed Asbestos Contractor: _____

SIGNED: _____

TITLE: _____

DATE: _____

COMPANY: _____

STATEMENT OF BIDDER'S QUALIFICATIONS

All questions must be answered and the data given must be clear and comprehensive. This statement must be notarized. If necessary, questions may be answered on separate attached sheets. The Bidder may submit any additional information he/she desires.

1. Name of Bidder.
2. Permanent main office address, including City, State, and Zip Code.
3. When organized.
4. If a corporation, when incorporated.
5. How many years have you been engaged in demolition under your present firm or trade name?
6. Contracts on hand at present time.
7. General character of work performed by your company.
8. Have you ever failed to complete any work awarded to you? If so, where and why?
9. List your major equipment currently available for this Contract. Includes equipment that is owned outright or leased.
10. Experience in demolition and site clearance work similar in importance to this project.
11. Has Bidder or any of its principals, owners, officers, agents, or employees, within five (5) years prior to the date hereof, been found guilty in any Court, or by any governmental agency, of any violation of any local, county, state or federal law, statute, rule, regulation or order prohibiting discrimination or involving or related to environmental protection, or is any proceeding now pending in any court or any governmental agency against bidder or any of its principals, owners, officers, agents, or employees on account of any thereof? If "yes", attach a separate page setting forth complete details.
12. Have you ever been a defendant, i.e. charged with discrimination, in any action or legal proceeding, including any proceeding related to or before any Federal Agency, involving matters related to race, color, nationality, or religion? If so, give full details.

Dated this ____ day of _____, 202_

Name of Bidder _____

By _____

Title _____

State of _____

County of _____

_____ being duly sworn, deposes and says
that he/she is the _____ of _____
the foregoing questions and all statements therein contained are true and correct.

Subscribed and sworn to before me this ____ day of _____, 202_

(Notary Public)

My commission expires _____

APPENDIX A: SITE PHOTOS
613 Broderick Drive











APPENDIX B: ASBESTOS SURVEY RESULTS



CMM Environmental
 415 N 3rd Street
 Rockford, IL 61107
 Phone: (815) 968-1266 Fax: (877) 314-4319
 www.cmmenvironmental.com

7/16/25

City of Savanna
 333 Chicago Ave.
 Savanna, IL 61074

Re: Asbestos Sampling 613 Broderick.

Dear City of Savanna,

On June 24, 2025, CMM Environmental conducted limited asbestos sampling at the above referenced location. During the inspection it was noted that the building may contain mercury switches, light ballasts and other hazardous materials that should be addressed prior to demolition.

CMM’s sampling of suspect asbestos containing materials were limited to the following:

- Floor Tile
- Drywall
- Baseboard & Mastic
- Ceiling Texture

The sampling of suspect materials was limited to amounts determined to be efficient to identify their asbestos content.

Table 1 – Asbestos Containing Materials

| Material Description | Material Location | Asbestos Type | Material Condition | Quantity |
|----------------------|-------------------|---------------|--------------------|----------|
| Floor Tile | Upstairs | 3% Chrysotile | Good | TBD |
| Floor Tile | Kitchen | 3% Chrysotile | Good | TBD |
| | | | | |
| | | | | |

- All quantities are estimated and any contractor should field verify quantities prior to bidding on this work.



CMM Environmental
415 N 3rd Street
Rockford, IL 61107
Phone: (815) 968-1266 Fax: (877) 314-4319
www.cmmenvironmental.com

77 Illinois Administrative Code Chapter I Section 855.345 references sampling Miscellaneous Materials "...in a manner sufficient to determine whether material is asbestos containing materials (ACM) or not asbestos containing materials." CMM has determined this to be interpreted as the generally accepted industry standard protocol of "three (3) samples to make a negative result for asbestos and one (1) sample to make a positive result for asbestos," however sampling protocols are sometimes varied due to the limited amounts of suspect materials present.

A group letter or combination of letter and number was assigned to each Homogenous Material. This combination serves as a prefix to identify materials of similar composition, texture, color, and date of installation. Each sample was then assigned a sample number such as 01, 02, 03, etc.

All samples were identified on a signed and dated Chain-of-Custody document, which accompanied the samples to the laboratory.

To ensure both quality and objectivity, an independent laboratory was used. Laboratories are selected based on their current accreditations. The laboratory chosen participates in the National Voluntary Laboratory Accreditation Program (NVLAP) for quality control procedures (NVLAP Lab Code: 200399-0). As specified in 40 CFR Chapter I (1-1-87 edition) Part 763, Subpart F, Appendix A. Please feel free to contact the laboratory directly with any questions.

Suspected asbestos samples were analyzed using polarized light microscopy (PLM) / dispersion staining techniques in accordance with the EPA Method documents "US EPA 600/M4-82-020, 1982" & "US EPA 600/R-93/118, 1993". Detection limits for this type of analysis are approximately one percent (by volume).



CMM Environmental
415 N 3rd Street
Rockford, IL 61107
Phone: (815) 968-1266 Fax: (877) 314-4319
www.cmmenvironmental.com

FRIABLE ASBESTOS – material can be crumbled, pulverized, or reduced to powder by hand pressure; these materials must be removed prior to demolition activities and should be addressed during renovation activities that would disturb the material, such as thermal system insulation. The following friable asbestos containing materials were identified:

- None

CATEGORY 1 NON-FRIABLE – material is pliable (not brittle), breaks by tearing rather than fracturing and does not easily release asbestos fibers upon breaking; these materials should be addressed during renovation activities that would disturb the material, but do not need removal prior to demolition activities (handled as demolition material at a certified landfill) if they are in good condition and not rendered friable during handling, transporting, and disposal. However, most asbestos containing building materials on concrete substrate are removed prior to demolition activities to reduce the overall cost due to landfill charges and the fact that concrete cannot be left on site or recycled with these materials in place. Category I Non-Friable materials include resilient floor coverings, asphalt roofing materials, gaskets, and packing. The following types of Category I Non-Friable asbestos were identified:

- Floor Tile (upstairs, kitchen)

CATEGORY II NON-FRIABLE – material is not pliable, breaks by fracturing rather than tearing, and does release some asbestos fibers upon breaking; these materials should be addressed during renovation activities that would disturb the material and are removed prior to demolition activities since they are normally rendered friable during demolition and/or handling, transporting and disposal. Category II Non-Friable materials include any non-friable asbestos containing material that is not in Category I (i.e. transite siding). The following types of Category II Non-Friable asbestos were identified:

- None

NON ASBESTOS CONTAINING MATERIALS – The following materials were tested and found to contain *no* asbestos (or less than 1%):

- Floor Tile (mechanical)
- Drywall
- Baseboard & Mastic
- Ceiling Texture



Recommendations / Directions / Instructions

If a material is analyzed, by any method, and is found to contain any amount of asbestos, personnel disturbing the material should at a minimum, wear personnel protection such as NIOSH approved respirators and full body protective clothing. It is further recommended that the building and its occupants be protected against the possible exposure of airborne asbestos fibers.

If the asbestos content is less than 10 percent as determined by a method other than point counting by polarized light microscopy (PLM), verify the asbestos content by point counting using PLM (USEPA Method 198.1). The owner/operator of the building may (1) elect to assume the amount to be greater than 1% and treat the material as asbestos-containing material or (2) require verification of the amount by point counting. If a result obtained by point count is different from a result obtained by visual estimation, the point count result shall be used. Point counting shall be conducted only by direction of the client at the client's expense. The client assumes and retains all responsibility and authority to conduct point counting at their expense.

Contractors should use caution and be advised and directed that during renovation or demolition of a structure that concealed materials may be discovered, therefore, should suspect materials not identified in this inspection become exposed or made aware, you should cease operations that may disturb, dislodge or disrupt the material until it is sampled and analyzed for its possible asbestos content.

Samples were collected at the request of our client in a manner that should identify suspect areas as being asbestos containing or not, however, sample collection strategies may not satisfy the appropriate structure's governing agency's rules or policies. The results in this report are intended for the sole use of our client for their personnel's safety and should not be considered as an asbestos inspection. Should the client intend to submit these sampling results to the structure's governing agency, then CMM will need to extend our services to include compliance with the governing agency's policies / rules at an additional expense.

CMM Environmental recommends the use of certified and licensed asbestos personnel for **all** planned disturbance of known and suspect asbestos containing products. In accordance with IDPH, IEPA, U.S.EPA and OSHA regulations asbestos containing materials must be removed by and disposed of by a certified/licensed asbestos abatement personnel/contractor.

Definitions

Asbestos Containing Products means, according to the U.S. EPA Method 600/R-93/116, Regulated Asbestos Containing Materials (RACM) are those materials found to contain greater than 1% asbestos per volume of bulk material sampled, by PLM. The term is not intended to include *de minimis* or inaccessible materials that do not present a risk of harm to public health and that generally would not be the subject of enforcement actions if brought to the attentions of appropriated regulatory agencies.

Asbestos Types are Chrysotile (white asbestos making up approximately 95% of all asbestos used in the United States), Amosite (brown asbestos making up approximately 5% of all asbestos used in the United States), Crocidolite (blue asbestos making up approximately less than 5% of all asbestos used in the United States), and rarely found in buildings are Anthophyllite, Tremolite & Actinolite.

Friable Asbestos Material means any material containing more than 1 percent asbestos as determined using the method specified in appendix E, subpart E, 40 CFR part 763 section 1, Polarized Light Microscopy, that, when dry, can be crumbled, pulverized, or reduced to powder by hand pressure.



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Homogeneous Material -- an area or group of Surfacing Materials, Thermal Systems Insulation, or Miscellaneous Materials that is uniform in color & texture and has the same installation date.

Polarized Light Microscopy (PLM) means an optical microscopy technique for analyzing bulk samples for asbestos in which the sample is illuminated with polarized light (light which vibrates in only one plane) to distinguish between different types of asbestos fibers by their shape and unique optical properties.

Transmission Electron Microscopy (TEM) means a method of microscopic analysis, which utilizes an electron beam that is focused onto a thin sample. As the beam penetrates (transmits) through the sample, the difference densities produces an image on a fluorescent screen from which samples can be identified and counted. Also used for analyzing air samples for asbestos.

Conclusion

The conclusions of this report are CMM's professional opinions, based solely upon visual site observations and interpretations of laboratory analyses, as described in this report. The opinions presented herein apply to the site conditions existing at the time of CMM's investigation and interpretation of current regulations pertaining to asbestos. Therefore, CMM's opinions and recommendations may not apply to future conditions that may exist at the site, which we have not had the opportunity to evaluate. It should be noted that conditions change and that materials constantly degrade. All applicable federal, state and local regulations should always be verified prior to any work that will disturb or dislodge materials confirmed, assumed or presumed to contain asbestos.

CMM's assessment was limited to observation, sampling and the analysis of suspect asbestos containing products in accessible portions of the area(s) covered by this survey. Materials in the building that are not considered building materials, are unusual or *de minimis*, or were inaccessible, due to common construction techniques, to the inspector were excluded from the inspection. As a result, additional asbestos containing building materials may be present in inaccessible areas (e.g. between walls, ceiling spaces enclosed by wallboard, interior of fire doors, below grade exterior piping and sealants, etc.) of the structure that were not observed during the survey.

This inspection report is designed to assist the client in the understanding of the regulations regarding asbestos, however, it should not be used as a substitution for obtaining and familiarizing yourself with, including the compliance of, all asbestos related regulations including, but not limited to, 40 CFR, Chapter 61, Subpart M (National Emission Standard for Asbestos) prior to the start of any renovation or demolition activity that will disturb or dislodge asbestos containing materials or suspect/assumed asbestos containing materials.

This report has been prepared for the exclusive use of the intended client, for the specific application to the defined property as addressed in this report. Any additional user of this report shall determine the suitability of the material contained herein for their intended use, and any such user assumes all risks and liability in connection therewith. No claim is made that these findings will remain applicable to future site activities and conditions. Interpretations by any such user from information contained in this report or the drawing of conclusions by any such user from information contained in this report shall be undertaken solely at the risk of said party.

At all times during the performance of the inspection, safety was a priority. Due to the emphasis on safety, there were no injuries, there was no building contamination, and there were no asbestos exposures to either CMM personnel or building occupants.



CMM Environmental
415 N 3rd Street
Rockford, IL 61107
Phone: (815) 968-1266 Fax: (877) 314-4319
www.cmmenvironmental.com

This report remains the sole property of CMM. The contents herein cannot be copied, scanned, duplicated, disclosed or distributed in whole or in part until complete and full payment has been received, or arraigned, for the complete services rendered, expenses incurred and/or, all legal, collection, and judgment fees afforded to CMM. either by contractual agreement or satisfactory judgments.

CMM. would like to thank you for the opportunity to be of service to you on this project. We hope that our performance has warranted the opportunity to work with you on future projects.

I hereby certify that all documents and work products prepared hereunder comply with all applicable laws and regulations, including, but not limited to, 105 ILCS 105, 225 ILCS 207 and 77 Ill. Adm. Code 855."

Signed,

A handwritten signature in dark ink, appearing to read 'Chris Manuel', is written over a light blue horizontal line.

Chris Manuel
President
Inspector # 100-20143



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Appendix A (Lab Report)



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EMSL Analytical, Inc.

4140 Lift Drive Hillside, IL 80182
 Tel/Fax: (773) 313-0099 / (773) 313-0139
<http://www.EMSL.com> / chicagolab@emsl.com

EMSL Order: 262506058
 Customer ID: CMM75
 Customer PO:
 Project ID:

Attention: Chris Manuel
 CMM Environmental
 415 N 3rd St
 Rockford, IL 61107
 Project: SAVANNA-813 BRODERICK

Phone: (815) 218-3784
 Fax:
 Received Date: 07/07/2025 11:40 AM
 Analysis Date: 07/11/2025
 Collected Date:

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E
 Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

| Sample | Description | Appearance | Non-Asbestos | | Asbestos |
|----------------------------------|------------------------------|---|---------------|--------------------------|------------------------------|
| | | | % Fibrous | % Non-Fibrous | % Type |
| 001 262506058-0001 | DW-HALL | Brown/White Non-Fibrous Homogeneous | 10% Cellulose | 90% Non-fibrous (Other) | None Detected |
| 002 262506058-0002 | DW-HALL | Brown/White Non-Fibrous Homogeneous | 10% Cellulose | 90% Non-fibrous (Other) | None Detected |
| 003 262506058-0003 | DW-HALL | Brown/White Non-Fibrous Homogeneous | 10% Cellulose | 90% Non-fibrous (Other) | None Detected |
| 004-Floor Tile 262506058-0004 | FT-UPPER | Beige Non-Fibrous Homogeneous | | 97% Non-fibrous (Other) | 3% Chrysotile |
| 004-Mastic 262506058-0004A | FT-UPPER | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 005-Floor Tile 262506058-0005 | FT-UPPER | | | | Positive Stop (Not Analyzed) |
| 005-Mastic 262506058-0005A | FT-UPPER | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 006-Floor Tile 262506058-0006 | FT-UPPER | | | | Positive Stop (Not Analyzed) |
| 006-Mastic 262506058-0006A | FT-UPPER | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 007-Cove Base 262506058-0007 | BASE & MASTIC -UPSTAIRS | Brown Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 007-Mastic 262506058-0007A | BASE & MASTIC -UPSTAIRS | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 008-Cove Base 262506058-0008 | BASE & MASTIC -UPSTAIRS | Brown Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 008-Mastic 262506058-0008A | BASE & MASTIC -UPSTAIRS | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 009-Cove Base 262506058-0009 | BASE & MASTIC -UPSTAIRS | Brown Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 009-Mastic 262506058-0009A | BASE & MASTIC -UPSTAIRS | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| 010-Texture 262506058-0010 | CEILING TEXTURE -BASEMENT | White Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |

Initial report from: 07/11/2025 13:23:31



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<http://www.EMSL.com / chicagolab@emsl.com>

EMSL Order: 262506058
 Customer ID: CMM75
 Customer PO:
 Project ID:

**Test Report: Asbestos Analysis of Bulk Materials via AHERA Method 40CFR 763 Subpart E
 Appendix E supplemented with EPA 600/R-93/116 using Polarized Light Microscopy**

| Sample | Description | Appearance | Non-Asbestos | | Asbestos |
|---|------------------------------|-------------------------------------|---------------|--------------------------|------------------------------|
| | | | % Fibrous | % Non-Fibrous | % Type |
| D10-Tape 1 262506058-0010A | CEILING TEXTURE -BASEMENT | White Fibrous Homogeneous | 98% Cellulose | 2% Non-fibrous (Other) | None Detected |
| D10-Joint Compound 1 262506058-0010B | CEILING TEXTURE -BASEMENT | White Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D10-Tape 2 262506058-0010C | CEILING TEXTURE -BASEMENT | White Fibrous Homogeneous | 98% Cellulose | 2% Non-fibrous (Other) | None Detected |
| D10-Joint Compound 2 262506058-0010D | CEILING TEXTURE -BASEMENT | White Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D11 262506058-0011 | CEILING TEXTURE -BASEMENT | White Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D12 262506058-0012 | CEILING TEXTURE -BASEMENT | White Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D13-Floor Tile 262506058-0013 | FT-MECH | Beige Non-Fibrous Homogeneous | | 97% Non-fibrous (Other) | 3% Chrysotile |
| D13-Mastic 262506058-0013A | FT-MECH | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D14-Floor Tile 262506058-0014 | FT-MECH | | | | Positive Stop (Not Analyzed) |
| D14-Mastic 262506058-0014A | FT-MECH | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D15-Floor Tile 262506058-0015 | FT-MECH | | | | Positive Stop (Not Analyzed) |
| D15-Mastic 262506058-0015A | FT-MECH | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D16-Floor Tile 262506058-0016 | FT-KITCHEN | Beige Non-Fibrous Homogeneous | | 97% Non-fibrous (Other) | 3% Chrysotile |
| D16-Mastic 262506058-0016A | FT-KITCHEN | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D17-Floor Tile 262506058-0017 | FT-KITCHEN | | | | Positive Stop (Not Analyzed) |
| D17-Mastic 262506058-0017A | FT-KITCHEN | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |
| D18-Floor Tile 262506058-0018 | FT-KITCHEN | | | | Positive Stop (Not Analyzed) |
| D18-Mastic 262506058-0018A | FT-KITCHEN | Tan Non-Fibrous Homogeneous | | 100% Non-fibrous (Other) | None Detected |

Initial report from: 07/11/2025 13:23:31



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<http://www.EMSL.com> / chicago@emsl.com

EMSL Order: 262506058
 Customer ID: CMM75
 Customer PO:
 Project ID:

Analyst(s)

Mazen Elkhatib (7)
 Rachelle Cullen-Reavill (21)

James Hahn, Laboratory Manager
 or Other Approved Signatory

EMSL maintains liability limited to cost of analysis. Interpretation and use of test results are the responsibility of the client. This report relates only to the samples reported above, and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. The report reflects the samples as received. Results are generated from the field sampling data (sampling volumes and areas, locations, etc.) provided by the client on the Chain of Custody. Samples are within quality control criteria and meet method specifications unless otherwise noted. The above analyses were performed in general compliance with Appendix E to Subpart E of 40 CFR (previously EPA 800/M4-82-020 "Interim Method") but augmented with procedures outlined in the 1995 ("Final") version of the method. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-fluorine organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Estimation of uncertainty is available on request.

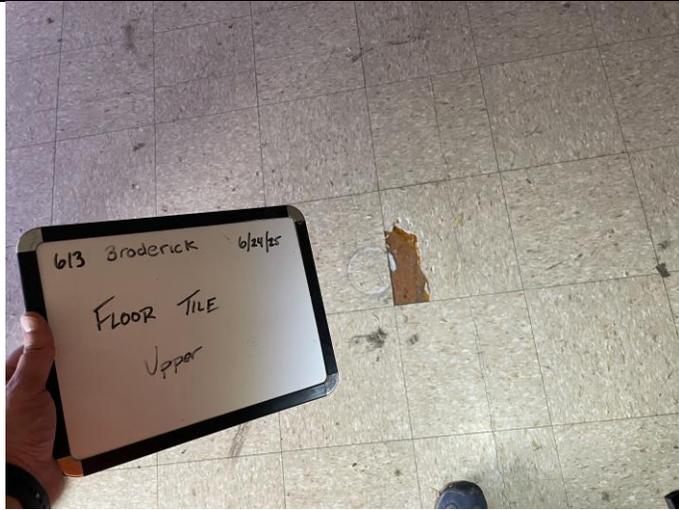
Samples analyzed by EMSL Analytical, Inc. Hillside, IL NVLAP Lab Code 200399-0

Initial report from: 07/11/2025 13:23:31

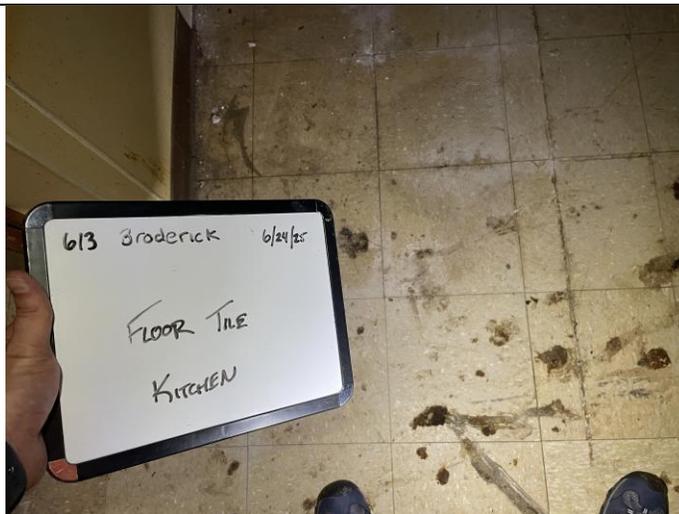


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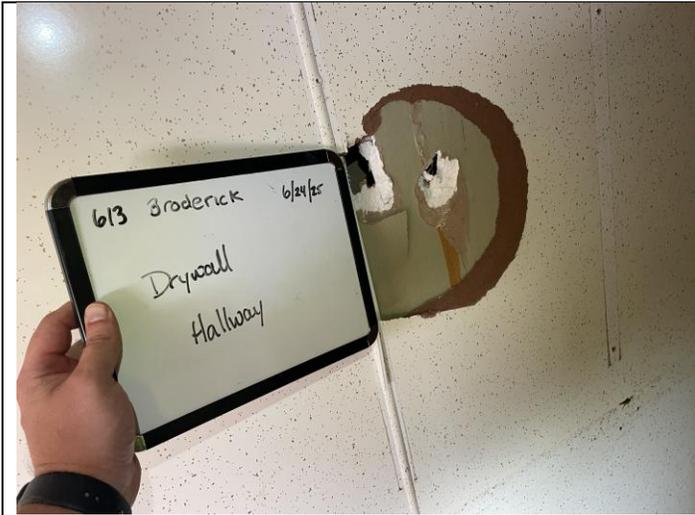
Appendix B (Pictures)



Date: 6/24/25
Location: Upper Level
Description: Floor Tile



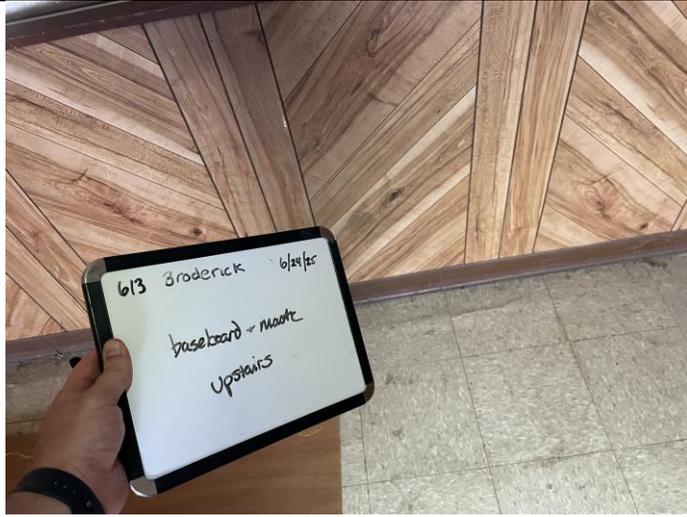
Date: 6/24/25
Location: Kitchen
Description: Floor Tile



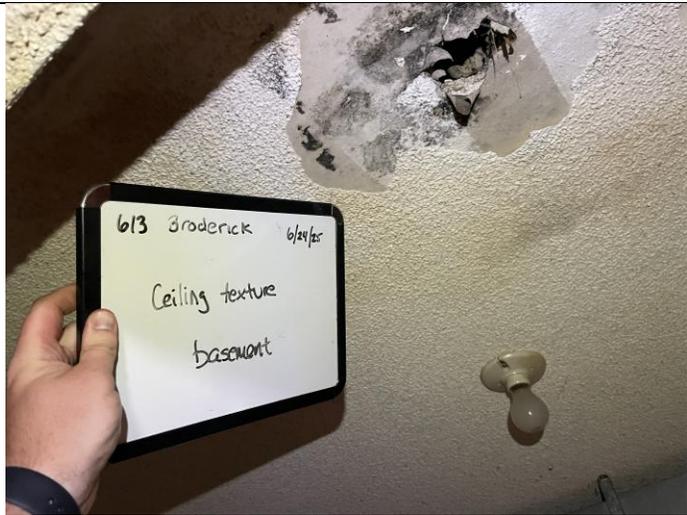
Date: 6/24/25
Location: Hallway
Description: Drywall



Date: 6/24/25
Location: Mechanical Room
Description: Floor Tile



Date: 6/24/25
Location: Upstairs
Description: Baseboard & Mastic



Date: 6/24/25
Location: Basement
Description: Ceiling Texture



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Appendix C (Certifications)



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United States Department of Commerce
 National Institute of Standards and Technology




Certificate of Accreditation to ISO/IEC 17025:2017

NVLAP LAB CODE: 200399-0

EMSL Analytical Inc.
 Hillside, IL

*is accredited by the National Voluntary Laboratory Accreditation Program for specific services,
 listed on the Scope of Accreditation, for:*

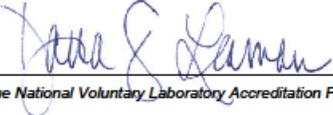
Asbestos Fiber Analysis

*This laboratory is accredited in accordance with the recognized International Standard ISO/IEC 17025:2017.
 This accreditation demonstrates technical competence for a defined scope and the operation of a laboratory quality
 management system (refer to joint ISO-ILAC-IAF Communique on ISO/IEC 17025).*

2025-04-01 through 2026-03-31

Effective Dates





For the National Voluntary Laboratory Accreditation Program



CMM Environmental
 415 N 3rd Street
 Rockford, IL 61107
 Phone: (815) 968-1266 Fax: (877) 314-4319
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IDPH ASBESTOS PROFESSIONAL LICENSE

| | | |
|---------------------------------|---------------------------|------------------------------|
| ID NUMBER 100 - 20143 | ISSUED 4/8/2025 | EXPIRES 05/15/2026 |
|---------------------------------|---------------------------|------------------------------|

CHRISTOPHER M MANUEL
 415 N 3RD STREET
 ROCKFORD, IL 61107
 Environmental Health



| ENDORSEMENTS | TC EXPIRES |
|--------------|------------|
| INSPECTOR | 1/10/2026 |

Alteration of this license shall result in legal action
 This license issued under authority of the State of Illinois
 Department of Public Health
 This license is valid only when accompanied by a valid
 training course certificate.

IDPH ASBESTOS PROFESSIONAL LICENSE

| | | |
|---------------------------------|----------------------------|------------------------------|
| ID NUMBER 100 - 20379 | ISSUED 4/16/2025 | EXPIRES 05/15/2026 |
|---------------------------------|----------------------------|------------------------------|

ZACK W MCINTYRE
 1615 WESTCHESTER DR
 ROCKFORD, IL 61107
 Environmental Health



| ENDORSEMENTS | TC EXPIRES |
|--------------------|------------|
| INSPECTOR | 1/10/2026 |
| MANAGEMENT PLANNER | 2/20/2026 |

Alteration of this license shall result in legal action
 This license issued under authority of the State of Illinois
 Department of Public Health
 This license is valid only when accompanied by a valid
 training course certificate.



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CERTIFICATION

This Certificate is given to

CMM ENVIRONMENTAL

*In recognition of being Certified as a Women Business Enterprise with the
 City of Rockford*

John W. Wirth

 John Wirth, Contract and Grant Compliance Officer

Thomas P. McNamara

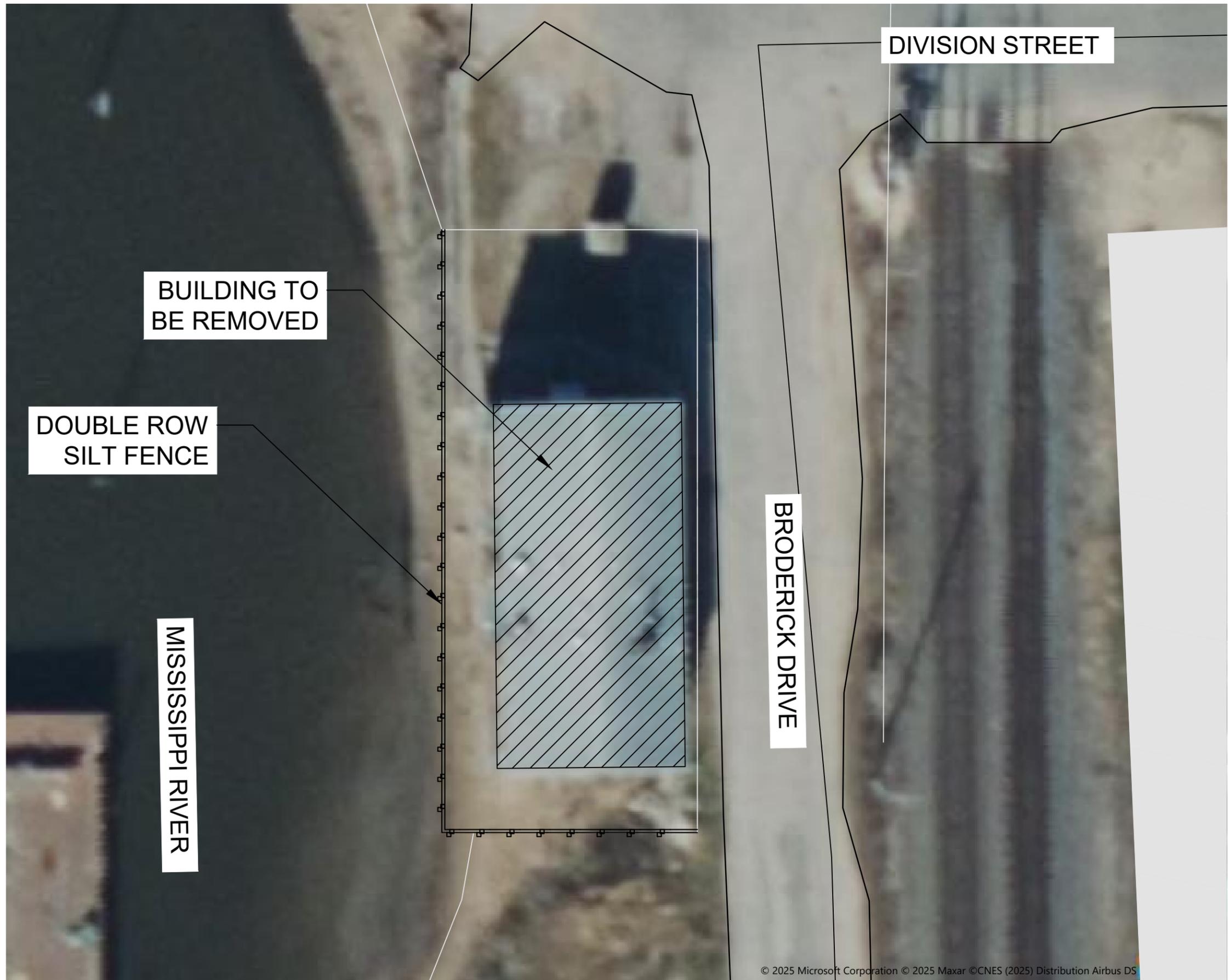
 Thomas P. McNamara, Mayor of the City of Rockford

September 17, 2024

Expiration Date

APPENDIX C: SITE PLAN

EXISTING BUILDING TO BE REMOVED TO TOP OF FOUNDATION AND DISPOSED OF OFF-SITE. THE FOUNDATION SHALL REMAIN. FLOATING SILT FENCE TO BE USED IF WATER LEVEL IS CLOSER THAN 15 -FOOT FROM FOUNDATION.



| PROJECT DATE: | DRAWN BY: | NO. | DATE | REVISION | BY |
|---------------|-----------|-----|----------|--------------------------|-----|
| | amj | 1 | 10/17/25 | JOINT PERMIT APPLICATION | AMJ |
| | Init | - | - | - | - |
| | Init | - | - | - | - |

PLOT DATE: 1/14/2026 11:50 AM, G:\00\00452\00452017\Pool 13 Building\CADD\Exhibits\00452017 - Pool 13 Site Plan.dwg

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 FUNDING | PLANNING | ENVIRONMENTAL
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POOL 13 - BUILDING REMOVAL
 CITY OF SAVANNA
 SAVANNA, ILLINOIS

BUILDING DEMOLITION PLAN



January 28, 2026

SUBJECT: Application for Permit No. S20260007
Project Title: 613 Broderick Drive Building Demolition
Mississippi River
Carroll County

Attn: Mayor Jeff Griswold
City of Savanna
333 Chicago Avenue
Savanna, Illinois 61074

Dear Mayor Griswold:

Thank you for the submittal of the subject application, for an Illinois Department of Natural Resources, Office of Water Resources (IDNR/OWR) permit to perform demolition of a building in the Southwest $\frac{1}{4}$ of Section 4 of Township 24 North, Range 3 East of the 4th Principal Meridian in Carroll County.

The act of demolition does not meet the definition of construction as defined under section 3700.20 of the rules for Construction in Floodways of Rivers, Lakes, and Streams (17 IAC Ch. I, Sec. 3700). Considering this and so long that all materials are removed from the mapped floodway, an IDNR/OWR permit is not required in accordance with 17 IAC Ch. I, Sec. 3700.

If any changes to the project will cause any work to be performed in the mapped floodplain, revised plans should be submitted to this office for review. This letter does not supersede any other federal, state, or local authorizations that may be required for the project. Please feel free to Kristian Peterson at 217/558-4532 or kristian.peterson@illinois.gov if you have any questions or comments concerning this matter.

Sincerely,

William B. Milner Jr, P.E., CFM
Section Chief, Downstate Regulatory Programs

WBM: KAP: EW

cc: City of Savanna (Jeremy Hughes)
MSA Professional Services (Angel Jacobs)
IDNR, NFIP Coordinator (Erin Conley)



DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ROCK ISLAND DISTRICT
PO BOX 2004 CLOCK TOWER BUILDING
ROCK ISLAND, ILLINOIS 61204-2004

[CEMVR-RD]

January 22, 2026

MEMORANDUM FOR RECORD

SUBJECT: US Army Corps of Engineers (Corps) Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), MVR-01059 (MFR 1 of 1)

BACKGROUND. An Approved Jurisdictional Determination (AJD) is a Corps document stating the presence or absence of waters of the United States on a parcel or a written statement and map identifying the limits of waters of the United States on a parcel. AJDs are clearly designated appealable actions and will include a basis of JD with the document.¹ AJDs are case-specific and are typically made in response to a request. AJDs are valid for a period of five years unless new information warrants revision of the determination before the expiration date or a District Engineer has identified, after public notice and comment, that specific geographic areas with rapidly changing environmental conditions merit re-verification on a more frequent basis.² For the purposes of this AJD, we have relied on section 10 of the Rivers and Harbors Act of 1899 (RHA),³ the Clean Water Act (CWA) implementing regulations published by the Department of the Army in 1986 and amended in 1993 (references 2.a. and 2.b. respectively), the 2008 *Rapanos-Carabell* guidance (reference 2.c.), and other applicable guidance, relevant case law and longstanding practice, (collectively the pre-2015 regulatory regime), and the *Sackett* decision (reference 2.d.) in evaluating jurisdiction.

This Memorandum for Record (MFR) constitutes the basis of jurisdiction for a Corps AJD as defined in 33 CFR §331.2. The features addressed in this AJD were evaluated consistent with the definition of “waters of the United States” found in the pre-2015 regulatory regime and consistent with the Supreme Court’s decision in *Sackett*. This AJD did not rely on the 2023 “Revised Definition of ‘Waters of the United States,’” as amended on 8 September 2023 (Amended 2023 Rule) because, as of the date of this decision, the Amended 2023 Rule is not applicable in Iowa due to litigation.

1. SUMMARY OF CONCLUSIONS.

- a. The review area is comprised entirely of dry land (i.e., there are no waters such as streams, rivers, wetlands, lakes, ponds, tidal waters, ditches, and the like in

¹ 33 CFR 331.2.

² Regulatory Guidance Letter 05-02.

³ USACE has authority under both Section 9 and Section 10 of the Rivers and Harbors Act of 1899 but for convenience, in this MFR, jurisdiction under RHA will be referred to as Section 10.

[CEMVR-RD]

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), [MRV-066]

the entire review area and there are no areas that have previously been determined to be jurisdictional under the Rivers and Harbors Act of 1899 in the review area).

The proposed 613 Broderick Drive Building Demolition takes place along the Mississippi River. The city plans to demolish and remove the two story metal structure and leave the concrete foundation in place, and will be utilizing a floating silt fence to minimize any sediment disturbance. As there will be no fill or dredging occurring, there will be no effects to the surrounding area.



2. REFERENCES.

- a. Final Rule for Regulatory Programs of the Corps of Engineers, 51 FR 41206 (November 13, 1986).

[CEMVR-RD]

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), [MRV-066]

- b. Clean Water Act Regulatory Programs, 58 FR 45008 (August 25, 1993).
- c. U.S. EPA & U.S. Army Corps of Engineers, Clean Water Act Jurisdiction Following the U.S. Supreme Court's Decision in *Rapanos v. United States & Carabell v. United States* (December 2, 2008)
- d. *Sackett v. EPA*, 598 U.S., 143 S. Ct. 1322 (2023)

3. REVIEW AREA.

This 0.015-acre project, located in Section 04, Township 24N, Range 03 E, Savanna, Carroll County Illinois, at 42.096918 -90.158925. The review area is next to the Mississippi River, with a river view public area and small industrial businesses in the surrounding area.



[CEMVR-RD]

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), [MRV-066]

4. NEAREST TRADITIONAL NAVIGABLE WATER (TNW), INTERSTATE WATER, OR THE TERRITORIAL SEAS TO WHICH THE AQUATIC RESOURCE IS CONNECTED.

N/A

5. FLOWPATH FROM THE SUBJECT AQUATIC RESOURCES TO A TNW, INTERSTATE WATER, OR THE TERRITORIAL SEAS

There are no aquatic resources present in the review area.

6. SECTION 10 JURISDICTIONAL WATERS⁴: Describe aquatic resources or other features within the review area determined to be jurisdictional in accordance with Section 10 of the Rivers and Harbors Act of 1899. Include the size of each aquatic resource or other feature within the review area and how it was determined to be jurisdictional in accordance with Section 10.⁵ N/A

7. SECTION 404 JURISDICTIONAL WATERS: Describe the aquatic resources within the review area that were found to meet the definition of waters of the United States in accordance with the pre-2015 regulatory regime and consistent with the Supreme Court's decision in *Sackett*. List each aquatic resource separately, by name, consistent with the naming convention used in section 1, above. Include a rationale for each aquatic resource, supporting that the aquatic resource meets the relevant category of "waters of the United States" in the pre-2015 regulatory regime. The rationale should also include a written description of, or reference to a map in the administrative record that shows, the lateral limits of jurisdiction for each aquatic resource, including how that limit was determined, and incorporate relevant references used. Include the size of each aquatic resource in acres or linear feet and attach and reference related figures as needed.

a. TNWs (a)(1): N/A

b. Interstate Waters (a)(2): N/A

c. Other Waters (a)(3): N/A

⁴ 33 CFR 329.9(a) A waterbody which was navigable in its natural or improved state, or which was susceptible of reasonable improvement (as discussed in § 329.8(b) of this part) retains its character as "navigable in law" even though it is not presently used for commerce, or is presently incapable of such use because of changed conditions or the presence of obstructions.

⁵ This MFR is not to be used to make a report of findings to support a determination that the water is a navigable water of the United States. The district must follow the procedures outlined in 33 CFR part 329.14 to make a determination that water is a navigable water of the United States subject to Section 10 of the RHA.

[CEMVR-RD]

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), [MRV-066]

- d. Impoundments (a)(4): N/A
- e. Tributaries (a)(5): N/A
- f. The territorial seas (a)(6): N/A
- g. Adjacent wetlands (a)(7): N/A

8. NON-JURISDICTIONAL AQUATIC RESOURCES AND FEATURES

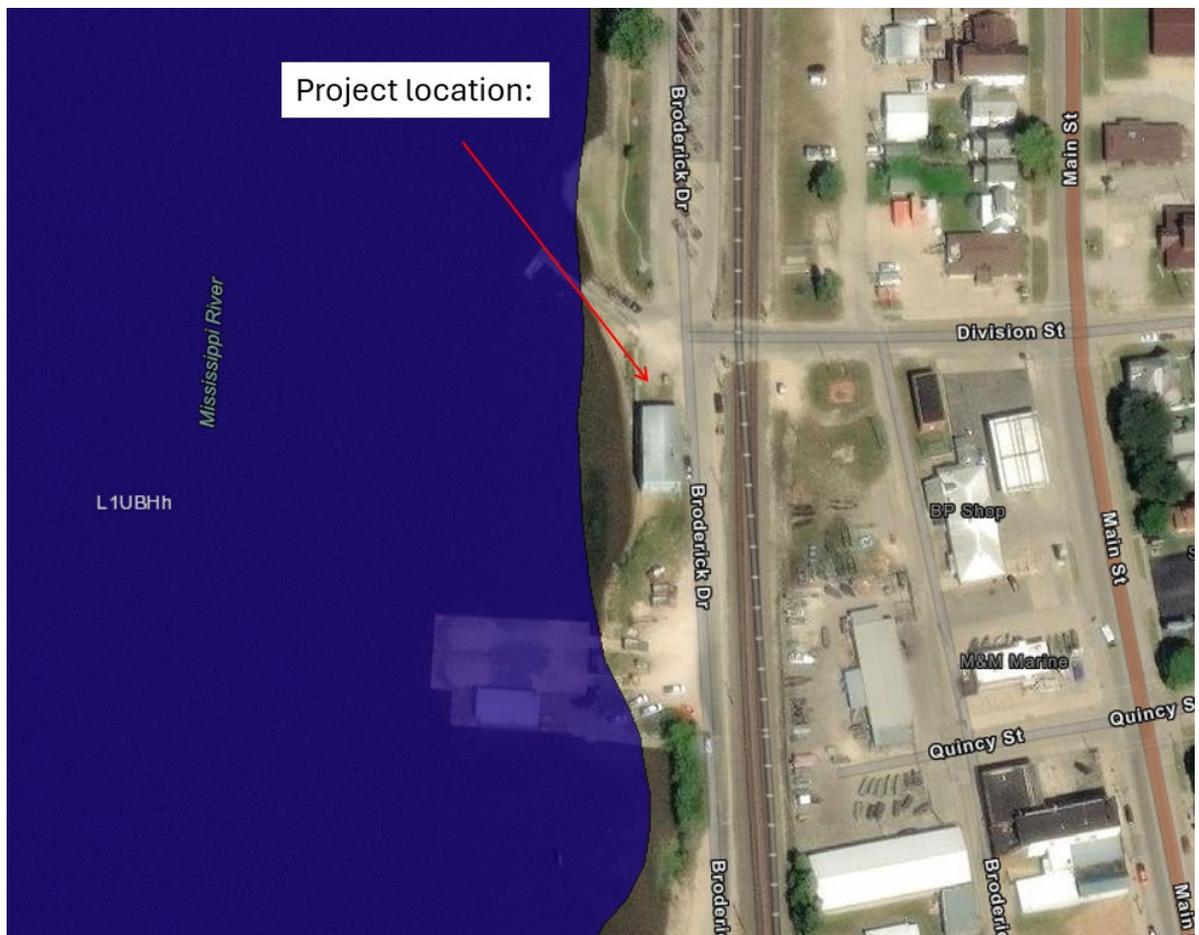
- a. Describe aquatic resources and other features within the review area identified as “generally non-jurisdictional” in the preamble to the 1986 regulations (referred to as “preamble waters”).⁶ Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA as a preamble water. N/A
- b. Describe aquatic resources and features within the review area identified as “generally not jurisdictional” in the *Rapanos* guidance. Include size of the aquatic resource or feature within the review area and describe how it was determined to be non-jurisdictional under the CWA based on the criteria listed in the guidance. N/A
- c. Describe aquatic resources and features identified within the review area as waste treatment systems, including treatment ponds or lagoons designed to meet the requirements of CWA. Include the size of the waste treatment system within the review area and describe how it was determined to be a waste treatment system. N/A
- d. Describe aquatic resources and features within the review area determined to be prior converted cropland in accordance with the 1993 regulations (reference 2.b.). Include the size of the aquatic resource or feature within the review area and describe how it was determined to be prior converted cropland. N/A
- e. Describe aquatic resources (i.e. lakes and ponds) within the review area, which do not have a nexus to interstate or foreign commerce, and prior to the January 2001 Supreme Court decision in “*SWANCC*,” would have been jurisdictional based solely on the “Migratory Bird Rule.” Include the size of the aquatic resource or feature, and how it was determined to be an “isolated water” in accordance with *SWANCC*. N/A

⁶ 51 FR 41217, November 13, 1986.

[CEMVR-RD]

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), [MRV-066]

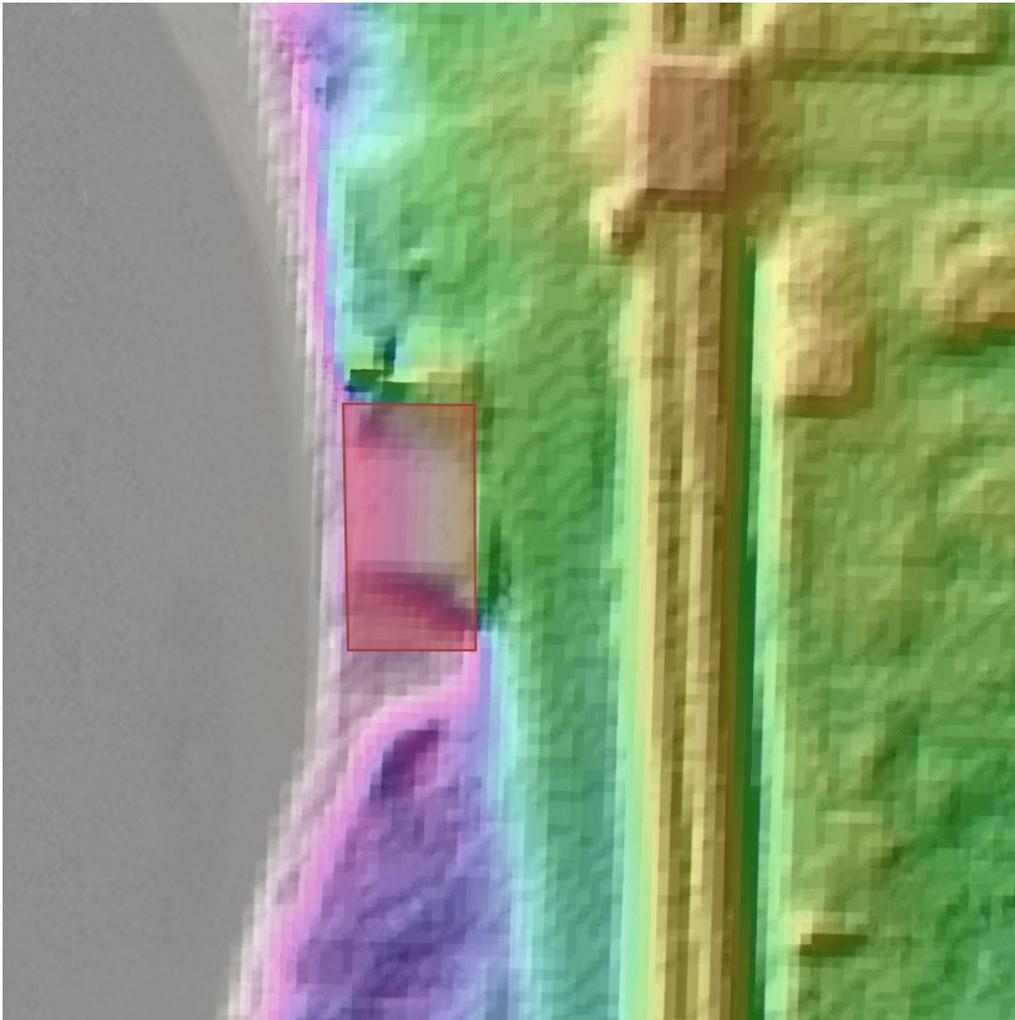
- f. Describe aquatic resources and features within the review area that were determined to be non-jurisdictional because they do not meet one or more categories of waters of the United States under the pre-2015 regulatory regime consistent with the Supreme Court's decision in *Sackett* (e.g., tributaries that are non-relatively permanent waters; non-tidal wetlands that do not have a continuous surface connection to a jurisdictional water). N/A
9. DATA SOURCES. List sources of data/information used in making determination. Include titles and dates of sources used and ensure that information referenced is available in the administrative record.
- a. National Wetland Inventory, January 22, 2026.



[CEMVR-RD]

SUBJECT: Pre-2015 Regulatory Regime Approved Jurisdictional Determination in Light of *Sackett v. EPA*, 143 S. Ct. 1322 (2023), [MRV-066]

b. Lidar – Illinois Regulatory Viewer, January 22, 2026.



10. OTHER SUPPORTING INFORMATION. N/A

11. NOTE: The structure and format of this MFR were developed in coordination with the EPA and Department of the Army. The MFR's structure and format may be subject to future modification or may be rescinded as needed to implement additional guidance from the agencies; however, the approved jurisdictional determination described herein is a final agency action.



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS, ROCK ISLAND DISTRICT
PO BOX 2004 CLOCK TOWER BUILDING
ROCK ISLAND, ILLINOIS 61204-2004

January 22, 2026

Regulatory Division

SUBJECT: CEMVR-RD-2026-066

Jeff Griswold
City of Savanna IL
333 Chicago Ave
Savanna IL, 61074
815-273-2251

Dear Jeff Griswold

Our office has reviewed your application received January 17, 2026, concerning the proposed 613 Broderick Drive Building Demolition, located in Section 04, Township 24N, Range 03 E, Savanna, Carroll County Illinois, at Lat: 42.096918, Long: -90.158925.

We have determined that your project, as proposed, by only taking down the main building structure, but leaving the concrete foundation in place, does not occur in a Water of the United States and therefore does not require a Department of the Army (DA) Section 404 permit. The decision regarding this action is based on information found in the administrative record which documents the District's decision-making process, the basis for the decision, and the final decision.

This letter contains an Approved Jurisdictional Determination (AJD) for the subject site. If you object to this jurisdictional determination, you may request an administrative appeal under Corps regulations found at 33 CFR Part 331. Enclosed is a Notification of Appeal Process (NAP) fact sheet and Request for Appeal (RFA) form. If you request to appeal this approved jurisdictional determination, you must submit a completed RFA form to the Mississippi Valley Division Office at the following address:

Brian Oberlies
Regulatory Appeals Review Officer
Mississippi Valley Division
1400 Walnut Street
Vicksburg, Mississippi 39180

In order for an RFA to be accepted by the Corps, the Corps must determine that it is complete, that it meets the criteria for appeal under 33 CFR Part 331.5, and that it has been received by the Division Office within 60 days of the date of the NAP. It is not necessary to submit an RFA form to the Division Office if you do not object to the AJD contained in this letter.

You are advised that this determination for your project is valid for five years from the date of this letter. If the project is not completed within this five-year period or your project plans change, you should contact our office for another determination.

Although a DA permit will not be required for the project, this does not eliminate the requirement that you must still acquire other applicable Federal, state, and local permits.

The Rock Island District Regulatory Division is committed to providing quality and timely service to our customers. In an effort to improve customer service, please take a moment to complete our Customer Service Survey found on our web site at <https://regulatory.ops.usace.army.mil/ords/f?p=136:4> (Be sure to select "Rock Island District" under the area entitled: Which Corps office did you deal with?).

Should you have any questions, please contact our Regulatory Division by letter, email savanah.l.meyne@usace.army.mil or telephone Savannah Meyne at 563-723-9167

Sincerely,

Abby Steele
Chief, Western Branch
Regulatory Division