



Narrative Information Sheet

1. Application Identification
 Kentucky Steam Heritage Corporation, 501c(3)
 Chris Campbell, President, Kentucky Steam Heritage Corporation
 499 Kirkland Avenue, Irvine, KY 40336
 DUNS Number: 080446745
2. Funding Requested
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$4,999,520
3. Location:
 - a. City: City of Irvine
 - b. County: Estill County, in the foothills of Appalachian Mountains
 - c. State: Kentucky
4. Property Information: located at 503 Kirkland Avenue, Irvine, Estill County, Kentucky 40336. It is a 26.96-acre tract of land with two structures including a 13,960-square-foot, one-story rail car repair shop and a 1,311-square-foot rail car utility shop.
5. Contacts:
 - a. Project Director:
 Chris Campbell, President, KSHC
 499 Kirkland Avenue, Irvine, KY 40336
 Phone: 859-619-8841
chris@kentuckysteam.org
 - b. Chief Executive:
 Joseph Crawford, Estill County 21st Century, Inc. dba, Estill Development Alliance
 P O Box 421, 177 Broadway, Irvine, Kentucky 40336
 Phone: 606-643-5902
Joe@Estill.org
6. Population: 2,360 - City of Irvine, KY An area of persistent poverty for the past 30 years
 (source: U.S. Census Bureau - <http://www.census.gov/>)
7. Other Factors:

Other Factors	Page number
Community population is 10,000 or less	Narrative Information Sheet, Page 1 (Section 1.a.i.)
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	No
The proposed brownfield site(s) is impacted by mine-scarred land.	Page 1 (Section 1.a.i.), Pages 5 & 6 (Section 2.a.ii.)
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Pages 3, 4 (Sections 1.c.ii., 1.c.iii., 1.c.iv) & within Narrative Attachments
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of	No



water or would be contiguous or partially contiguous with a body of water but for a street, road or other public thoroughfare separating them).	
The proposed site(s) is in a federally designated flood plain.	No, but does reside in a special flood hazard area. Page 1 of Narrative (Section 1.a.i.)
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Page 2 (Section 1.b.ii.), Page 4 (Section 1.c.iv.)
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Page 2 (Section 1.b.ii.), Page 4 (Section 1.c.iv.)
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Page 2 (Section 1.b.ii.)
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	No
EPA Additional Considerations	Page #
Whether applicant’s jurisdiction is located within, or includes, a county experiencing “persistent poverty” where 20% or more of its population has lived in poverty over the last 30 years, as measured by the 1990 and 2000 decennial censuses and the most recent Small Area Income and Poverty Estimates.	Narrative Information Sheet, Page 1 (Section 1.a.i.)



1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

This section describes the plans to revitalize the target area in the community of Irvine, KY. Realization of revitalization plans will create a tourist destination for the region and the state providing for jobs and revenue that are needed in Appalachia today.

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area: The target area for brownfield cleanup is the former CSX Ravenna Rail Yard, which is now owned and under planning for revitalization by The Kentucky Steam Heritage Corporation (KSHC). Located directly across from the downtown economic center in the City of Irvine, the EPA brownfield site at 503 Kirkland Avenue will serve community members and visitors alike in this area of blight. The site was historically purposed with coal production, cleaning, and sorting because of the Appalachian Region's past coal mineral wealth. The approximately 26.96-acre site is in a special flood hazard area of the southern portion of the City of Irvine in a commercial/light industrial district encompassing buildings and heavily wooded areas. Estill County is located in the foothills of the Appalachian Mountains along a portion of the Kentucky River. Like much of Appalachia, hundreds of acres in Estill County continue to be mine-scarred by the stockpiling of spent coal materials, creating areas of blight. The City of Irvine has a small population of 2,360 people, with only 14,163 residents in the county as a whole. Although they have strong community volunteer support, KSHC and the City of Irvine have small operating budgets and limited staff and resources. They lack the capacity and funding to clean up the brownfield site at 503 Kirkland Avenue. Estill County is identified as an area of "persistent poverty" because 26.1-29% of residents have lived in poverty over the last 30 years, as measured by the 1990 and 2000 decennial censuses (www.census.gov). The Appalachian Regional Commission (ARC) classifies Estill County as distressed. The KSHC was founded as a non-profit charity in 2015 to promote tourism in Estill County and the State of Kentucky through rail-related activities and to provide job training and educational opportunities for Estill County residents. Its location is about 50 miles southeast of metropolitan Lexington and adjacent to the natural beauty of the Daniel Boone National Forest, creating tourism potential. The Kentucky Rail Heritage Center (KRHC) economic redevelopment adaptive reuse project is a community-backed redevelopment and reuse project through the partnership of KSHC and CSX Transportation Inc. (CSX). This partnership will have a transformative impact on a county whose Appalachian past is steeped in coal but whose future lies in the creative reuse of contaminated, mine-scarred land.

1.a.ii. Description of the Proposed Brownfield Site(s): The 26.96-acre site has two structures: a 13,960-square foot, one-story railcar repair shop and a 1,311-square-foot rail car utility shop. Phase I and II environmental site assessments (ESAs) were conducted under EPA's Targeted Brownfields Assessment (TBA) program in 2018 when the site was associated with 499 Kirkland Avenue; Phase I and II ESAs were conducted in 2023 specifically for 503 Kirkland Avenue. Based on the results of the Phase I, Phase II activities included a lead-based paint (LBP) survey and multi-media sampling. Results of the Phase II revealed LBP exists in various areas associated with the railcar repair shop. The soil, groundwater, surface water, sediment, and soil gas all contain volatile organic compound (VOC), semi-volatile organic compound (SVOC), total petroleum hydrocarbon (TPH), metal, and radionuclide contaminants exceeding their federal comparison criteria.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: The KRHC has partnered with CSX and Estill County to redevelop the former CSX Ravenna Rail Yard at 503 Kirkland Avenue, Irvine, Kentucky. The adaptive reuse project will utilize property in an area where land use has not always been beneficial to the environment or the health of its people. The redevelopment goals of KSHC are directly in line with Estill County and the Bluegrass Area Development District (BGADD) comprehensive land use and economic development plans: the cultural heritage is derived from both



coal mining and the associated rail infrastructure will spur and the redevelopment goals promote Estill County and eastern Kentucky as a tourist destination. The combined goals of this project will help to spur tourism and economic self-sufficiency for the City of Irvine, Estill County, and the surrounding counties through tourism dollars. A 10.62-acre former brownfield parcel, adjacent to the current KRHC site, is being redeveloped and marketed as “The Yard: Irvine’s Gateway to Appalachia.” KRHC’s revitalization plans will utilize the 26.96-acre brownfield parcel of land to maximize crowd capacity and tourism opportunities by providing 10 acres for picnic and campsites/RV parking working in tandem with the adjacent 10.62-acre former brownfield site. The combined sites serve as multi-use, multi-faceted attraction for tourists and the community, including a 5,000-person capacity amphitheater/concert venue, a climate-controlled exposition building capable of hosting large events, a restaurant/brewery, the historic rail museum and gift shop, a historic tourist steam locomotive rail experience, technical skill center, railroad memorial, picnic/camping areas, green scape, fitness and biking trail, and solar farm.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The redevelopment of the former CSX Ravenna Rail Yard by the KSHC is critical to reversing the negative impacts of blight on Irvine’s economic downtown corridor. The adaptive reuse will allow the site to serve as a place where this Appalachian community can restore a positive identity based on re-envisioning the use of historic coal and rail infrastructure. The population of the City of Irvine is small and largely consists of children and elderly residents. The reuse planning will not result in the displacement of residents or businesses. The KRHC project will act as a catalyst in providing economic and educational opportunities for young adults so they can have pride and purpose in remaining to strengthen and sustain the City of Irvine. The development of the KRHC project is a key component of the overall redevelopment plan for Estill County. The KRHC project will directly supplement economic enhancement already under development with an onsite restaurant, museum, and concert/event venue on the adjoining 10.62-acre former brownfield site completed in 2023. The 26.96-acre brownfield grant site will work in tandem by providing 10 acres for picnic and campsites/RV parking. Currently, attendees to KRHC events must seek accommodation away from the City of Irvine depriving the county of possible and much needed revenue. The KRHC site is projected to attract over 100,000 visitors annually, provide 25 permanent jobs, and significantly increase revenue by the second year of operation. Onsite workforce betterment programs in the revitalized rail shop will educate local job seekers and unemployed in technical skills including welding, machining, fabrication, and other infrastructure maintenance specialties, preserving railroad heritage, and supporting community growth and innovation while caring for this important investment over the long-term. With the support of Berea College (located just 25 miles from Irvine) and the State of Kentucky, KRHC will take advantage of site topography to create an 8-acre solar farm for renewable energy. Further efforts by KRHC to address climate adaptation and mitigation include making older technology more efficient by repurposing the train locomotive’s coal-reliant technology to burn waste fuel oil as well as incorporating energy efficiency improvements in existing structures. The needs of the community will be further served through the extension of a fitness walking/biking path as a route for sustainable transportation and to increase opportunities for health and wellness. Berea College will support the KRHC project by analyzing the existing tree canopy to determine how best to landscape to manage runoff from parking and sidewalk hardscape, to increase stormwater infiltration, and improve water quality. The rest of the acreage will be dedicated to a railroad memorial and green infrastructure designed by students from the Sustainability and Environmental Studies Department at Berea College. The department has a mission to help communities coexist in a manner that maintains social justice, environmental integrity, and economic well-being. The KRHC adaptive reuse plan will help this impoverished Appalachian community thrive once again by coordinating and leveraging federal policies and investments and enhancing their economic competitiveness.



1.c. Strategy for Leveraging Resources

1.c.i Resources Needed for Site Characterization: The EPA Brownfield and the Kentucky Brownfields Program were instrumental in getting the site, formerly known as 499 Kirkland Avenue, assessed with both a Phase I and Phase II ESA of the area, dating back to 2018. In October 2023, Phase I and II ESAs were conducted to support this new parcel, known as 503 Kirkland Avenue. The ABCA that resulted reflects the current market prices and Davis Bacon Wage rates. No further need for assessment or characterization is anticipated. If during remediation and development there are previously unknown site conditions identified that require assessment, that KSHC will work with the town, county, BGADD, etc. to find the resources for further assessment.

1.c.ii Resources Needed for Site Remediation: Remediation of the site is estimated at just under \$5M, and without EPA Brownfields Cleanup Grant funding, the project will not be attainable. The amount of funding requested will cover the proposed cleanup activities needed to complete revitalization of the entire property. With its clear vision and plans for the site, KSHC has received \$1.9M in grant funding from the Abandoned Mine Land Economic Revitalization (AMLER) program to help fund the infrastructure of the project. KSHC has received a \$120,000 loan through the States Brownfield Revolving Loan Fund (RLF) to support cleanup on the adjacent property associated with the redevelopment. An EPA TBA (Phase I and II ESAs and ABCA) were completed when site address was associated with 499 Kirkland Avenue valued at \$162,500; pro bono Phase I and Phase II ESAs and ABCA for the site at 503 Kirkland Avenue valued at \$20,000; and a KDEP grant of \$2,500 to cover Kentucky Brownfield Program application fee. However, despite all these resources amassed to date, a budget gap remains and funding the remediation with additional loan money would not be feasible for the city. The funds obtained are not enough to complete the cleanup. Thus, 2024 EPA Brownfields Cleanup Grant funding is imperative to the project's success as it will work in tandem with AMLER and state RLF funding and the in-kind resources. Cost estimates for remediation were developed based on the findings of the Phase I and II ESAs for 503 Kirkland Avenue.

1.c.iii. Resources Needed for Site Reuse: As evidenced by the Narrative attachments, an excess of \$3.5 million has been leveraged to date for this project that is not dependent on the award of this grant, including: Brownfield RLF loan valued at \$120,000. The KSHC's corporate partners CSX, Norfolk Southern, and R.J. Corman have donated more than \$1M of in-kind equipment and services. KSHC has also obtained significant support and leveraging through in-kind labor, historic train railcars, other equipment, and supplies it has gathered from community and industry to enrich this adaptive reuse project. In addition, KRHC has received grant funding from other sources, including \$1.9M in AMLER Grant funds for the ARC partnership with Berea College for construction of an 8-acre solar farm on site. An additional \$511,150 of in-kind and monetary donations have been gifted through private and local business donations (see attachments) for purposes such as site renderings and a diorama; property, equipment, and rail car purchase; electrical plans; clearing and grubbing the site; and transportation. This significant amount demonstrates that others in the region feel this project holds promise and is a worthy investment of public resources.

1.c.iv. Use of Existing Infrastructure: An EPA Brownfields Cleanup Grant is needed to work in tandem with an AMLER Grant secured by KSHC. This redevelopment will make use of existing infrastructure (buildings, roads, utilities, telecommunications, etc.). The secured AMLER Grant redevelopment plans include clean up, restoration, adaptation of existing infrastructure, and installation of new infrastructure to create attractions for both locals and tourists. KRHC owns an adjacent former brownfield parcel that has been redeveloped into a concert venue that, combined with KRHC green space, can serve up to 5,000 people. However, to access the buildings and sites planned for economic redevelopment, the public must travel over contaminated land. The adjacent 10.62-acre former brownfield parcel site will not hold the projected crowd capacity in the adaptive reuse plans. The AMLER Grant provides for adaptive reuse of existing infrastructure improvements include a new roof



and brick repointing for the historical rail building dating from 1914; fuel yard maintenance; moving and reconstruction of a glasshouse on site; installation of energy-efficient HVAC so the glasshouse could be used as a climate-controlled event space; and grading and connecting donated rail to existing track infrastructure. Cleanup and reuse of this site adds site capacity for visitors to the adjacent venue that the EPA already helped clean up. The proposed rail that serves as a featured tourist attraction is planned for the EPA brownfield site identified in this application at 503 Kirkland Avenue. Achieving the economic goals for tourism and community benefit embodied in the AMLER Grant relies heavily on EPA brownfield site cleanup funding. EPA funding will be used to complete cleanup for planned land uses, such as camping, picnic shelters, walking and bike paths, and green space. Existing power infrastructure has been refurbished and with support from Berea College and the State of Kentucky, the power infrastructure will be supplemented with an 8-acre solar array on site. Roadway entry and egress and internal thoroughfares will be preserved but bioswales will be added. Existing water supply connections are in good condition and will be modified to accommodate additional use at the redeveloped site, eliminating the need to install infrastructure that the KSHC cannot afford.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i The Community's Need for Funding: The KRHC project is in Irvine, which is a small, underserved city in Estill County that faces many environmental, economic, and social challenges. The scope of the KRHC project is focused on addressing those challenges and bringing new life and economic activity to Irvine and the Eastern Kentucky region. The site will also serve as a bridge to a brighter future for Estill County residents with new opportunities for revitalization, job growth, and connectivity to other portions of Kentucky. While in operation, the CSX Ravenna Rail Yard employed a vast number of people as Irvine was built to serve the coal rail operations. Its closure hastened the loss of disposable income for community residents and increased their travel distances for employment. Population decreases have continued to plague Estill County, resulting in a lower tax base and unusually high unemployment compared to other parts of Kentucky and the nation. The median income in Irvine is \$35,462 compared to the median income of KY at \$59,341 ([Irvine city, Kentucky - Census Bureau Profile](#)). Estill County and the City of Irvine continue to be plagued by high unemployment rates and persistent poverty. The American Community Survey (ACS) indicated that Irvine has 37.4% employment rate, which is much lower than the rate for KY at 56.8%. According to 2021 ACS data the priority tract is in the 91st percentile for unemployment; 27.3% of the population in Irvine lives below the poverty line; and the poverty rate for the priority tract is 41%. Additionally, Estill County residents who remain now travel outside the county for employment, entertainment, and basic needs with a mean travel time to work for persons over the age of 16 is 33.4 minutes, compared to 26.4 minutes nationally. The travel of residents outside of Estill County enables the spending of their recreational dollars in Madison, Clark, and Fayette Counties. While out of the county, they also spend disposable income on essential items such as food, clothing, and household products. The KRHC is envisioned to be a unique mixture of a museum, rail-related business incubator, vocational learning location, and anchor site for tourist/ passenger train operations. As such, the KRHC project is important to conserving, celebrating, and leveraging the railroad heritage that has been a part of Irvine's identity for more than a century. The KRHC project is also important for leveraging its ideal location between the junction of Interstates 64 and 75, less than an hour drive from the large metropolitan population in Lexington, adjacent to the Daniel Boone National Forest and near Red River Gorge, both areas of great natural beauty. While the Irvine area itself exhibits a geographic benefit as one of the most accessible 'gateways' to Eastern Kentucky, lack of amenities and access to tourist-friendly areas has been a barrier to developing an economic tourism base in Estill County. The KRHC project, which aims to address many of these challenges at once, has the support of the local community, regional stakeholders, and state government, as evidenced by letters of support attached.



2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: The presence of contaminants confirmed by site ESAs, as well as the physical conditions of the buildings, pose significant health and environmental justice challenges to area residents especially those living in poverty. Exposure to VOCs, SVOCs, TPH, metals, LBP and asbestos contaminants can cause several health issues, including cancer, respiratory disease, organ failure, and developmental brain damage. Approximately 74% of residents in Irvine are younger than 18 or over the age of 65. Elders in the area are at particularly high risk of premature death at a rate of 14,500, which is nearly 3 times the rate of healthiest counties in the U.S.(5,500), and well over the state average of 9,700 according to the 2020 County Health Rankings

(CHR) data. The CHR cites the leading causes of premature death in Estill County as cancer, heart disease, respiratory disease, and liver disease, which correlate with the environmental contaminants found on the property. Safety risks are also a concern as the unused buildings create opportunities for vandalism, illicit drug use, and other crimes. Youth in the community are particularly drawn to these areas and therefore increase the exposure risk to the population. A 2022 ARC report revealed a 37% higher mortality rate in the Appalachian Region from the diseases of despair (overdose from alcohol, prescription-drug, illegal-drug; suicide; cirrhosis of the liver) than in the non-Appalachian U.S. ([ARC](#)).

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Environmental contaminants, as well as impacts from when the coal industry was in its prime, are known to cause illnesses in vulnerable groups, especially children 6 years old and under and adults over 65. In 2007, the Kentucky Institute of Medicine published a health assessment that evaluated and ranked all counties within the state. Of the 120 counties in Kentucky, Estill County ranked 89th. Based on the study, the most prevalent and pressing health issues in Estill County are smoking, oral health, cardiovascular deaths, lung/bronchus cancer, and colorectal cancer. The study concluded that on a long-term basis, an effort to improve the health status can be expected to elevate the county's economic status. Lack of access to primary care physicians is a key issue affecting the health of the county. Estill County has a primary care physician to population ratio of 3,672:1, as compared to 1,588:1 in Kentucky and 1,098:1 nationally. Redevelopment and reuse of this blighted and vacant property will stimulate a variety of businesses, improvements, and employment throughout the county, and therefore increase opportunities for available healthcare.

(3) Promoting Environmental Justice

(a) Identification of Environmental Justice Issues & (b) Advancing Environmental Justice:

Because Irvine and Estill County are small, environmentally and economically disadvantaged Appalachian communities, federal assistance through this EPA Brownfields Cleanup Grant is needed to ensure environmental justice outcomes. The Federal Justice 40 initiative identifies remediation and reduction of legacy pollution as a funding goal because disadvantaged communities are marginalized, underserved, and overburdened by pollution. According to CEJST, the Target Area is within a disadvantaged tract for 5 of the 8 burden thresholds. Irvine and Estill County have experienced a legacy of mine-scarred land from previous coal sorting and cleaning operations on the CSX rail line along the Kentucky River. When coal production and cleaning ceased, the people of Irvine were left with a disproportionate share of the negative environmental and economic consequences resulting from the former commercial coal operations. In addition, the rural nature of Irvine and Estill County and other factors affect KRHC's ability to generate the funds needed to conduct the cleanup of the former CSX Ravenna Rail Yard, including low levels of educational attainment with 24.8% of residents dropping out and another 34.0% seeking a high school diploma/GED. The Irvine brownfield site is in a tract in which the unemployment rate is in the 91st percentile nationally (2021 ACS). Other contributing factors include the shuttering of local businesses; lack of accessible transportation; lack of community services; and lack of disposable income. Residents without a high school diploma are more likely to have low-paying jobs or be unemployed, thereby affecting their ability to provide for themselves. The 2021 ACS Census data indicated that 27.3% of residents in Irvine live below the



poverty line and 41% of residents in the priority tract live in poverty. The grant funding for this adaptive reuse will remediate mine-scarred land, create over 25 jobs at the property, provide trade education, improve access to transportation, jumpstart local tourism creating 100+ jobs, increase the tax base, and invest in the physical and biological well-being of the community.

2.b. Community Engagement

2.b.i. Project Involvement & 2.b.ii. Project Roles: The KRHC has sought input by regional community leaders in the adjoining counties of Clark, Lee, Breathitt, and Perry, as well as state and federal leaders. In addition, KRHC has hosted events to provide the community with meaningful opportunities for participation in the planned redevelopment. The KRHC will include a working train restoration and maintenance shop that benefits the local educational community through relationship with Estill County Public Schools and Estill County Career and Technical School to build curriculum around the many systems of a steam locomotive; the new career and technical school in Estill County will allow local vocational students to practice skilled trades while working on heritage rail equipment. KSHC has partnered with Estill Development Alliance, Eastern Kentucky Railway Company, Indiana Transportation Museum, Estill County Fiscal Court, CSX, the Kentucky Department for Local Government, and the Kentucky Railway Museum. These organizations have donated or will donate property, in-kind services and equipment, marketing, public meeting support, and educational services.

2.b.iii. Incorporating Community Input: KRHC has the full support of the community, as evidenced by the turnout at the October 7, 2023, community meeting, announcing our intent to apply for an EPA Brownfields Cleanup Grant for the 26.96-acre parcel of land and mitigation in the two buildings on the parcel. Every meeting attendee (100%) was in support of the KRHC and look forward to the opportunities that will follow during and after redevelopment. KRHC continually posts information about planned activities through their official website, Facebook, and other social media outlets. Flyers will be posted in community centers and shared on church message boards. KRHC will leverage these platforms to effectively reach out to local community members for feedback and input. If awarded an EPA Brownfields Cleanup Grant, KRHC will prepare a Community Involvement Plan (CIP) that will outline community involvement activities for the duration of the 4-year project. These activities will include preparing data factsheets, distribution/ mailing lists, open houses, community meetings, and social media posts. KSHC understands the importance of meaningful, community participation in the brownfield cleanup process. Therefore, KSHC will work closely with our partner organizations and community members to ensure the success of the cleanup project. Information gathered from community outreach will be compiled for consideration as a part of the redevelopment and reuse plan. Community involvement coordinators will ensure public comments are captured and directly followed up on in an efficient and effective manner. The CIP will be updated with community concerns and will include responses to those concerns.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING SUCCESS

3.a. Proposed Cleanup Plan

The Phase II ESA identified VOCs, SVOCs, TPH, metals, and radionuclides in the soil, groundwater, sediment, surface water, and waste pile samples above EPA screening levels. In addition, LBP was identified in building materials. KSHC will procure a qualified contractor to prepare and submit a cleanup plan for remediation of environmental hazards, and appropriate recycling or disposal of remediation wastes and debris. The proposed cleanup plan for the site will expand on the attached, draft ABCA and will provide detailed remedial activities and cleanup costs. Multiple options for addressing each of the environmental hazards were evaluated during the ABCA, and the feasible, cost-effective, remedial options, based on our planned redevelopment as the KRHC, were identified. Our proposed cleanup plan will include the following activities in accordance with a Kentucky Department for Environmental Protection (KDEP) approved cleanup plan:



- Managing contaminated soil on site by installing geotextile liner and 1 foot of clean cap material;
- Preparation of an environmental covenant and deed restriction to address managed on-site soil and groundwater contamination;
- Leveling the depressed area that seasonally holds water with on-site materials and installing 1 foot of clean cap material in preparation for the solar farm installation; and
- LBP encapsulation on surfaces associated with the railcar repair shop.

The proposed cleanup plan for the site will discuss the recognized environmental conditions (RECs) identified and evaluated in the ESAs and ABCA. In addition, the cleanup plan will identify the nature and extent of environmentally impacted areas on the site; the site preparation work needed to prepare for remediation; the remedial activities needed to implement corrective measures and protect site workers, visitors, and the environment during planned future land uses; and the inspection and maintenance requirements to maintain any long-term site controls installed or implemented during the remedial action. The cleanup plan will also identify the permits required to complete remediation, the project stakeholders, the chain-of-authority, and communication and reporting procedures.

3.b. Description of Tasks/Activities and Outputs

3.b.i. Project Implementation (10) & ii. Anticipated Project Schedule

Task 1 – Project Management and Reporting KSHC is a 501(c)3 nonprofit organization that will provide project management and programmatic support. Tasks will include contractor procurement and management oversight of all consultant and contractor involvement; attending and hosting meetings with EPA, KDEP, and community stakeholders; and quarterly and annual reporting of project progress and costs to EPA. KSHC anticipates about \$50,000 in project management labor costs; \$9,000 in travel for national brownfield conference, regional brownfield conferences, and new grantee workshop; and \$5,000 in supplies. We anticipate that our consultant will incur about \$60,000 in costs preparing quarterly and annual project management reports. This task will begin immediately upon award and will continue throughout the 4-year duration of the project. Monthly project team meetings will occur to ensure successful management of time and budget. This task will be co-led by Chris Campbell (Project Director) and Joe Crawford (Executive Officer).

Task 2 – Community Involvement and Engagement KSHC will work with the BGADD, Berea College, Estill Development Alliance, Estill Action Group, and other community action groups to hold several community/public meetings throughout the duration of the project, ensuring that all project stakeholders are afforded meaningful participation in all aspects of the cleanup and redevelopment processes. In addition, KSHC will distribute pertinent project information in local newspapers, social media platforms, and factsheets. The estimated budget for community involvement is \$60,000 in labor and \$5,000 in supplies to support materials needed for community events. Community involvement activities will include preparing a draft CIP within the first quarter of the grant, community/public meetings held quarterly with a virtual attendance option, and preparation/update of factsheets quarterly to be shared at public meetings. A consulting firm will be hired, and the firm's community involvement coordinator will work with the project director and project stakeholders to ensure that local, state, federal, and community stakeholders are kept informed of project activities. We anticipate that our consultant will incur about \$50,000 preparing the CIP and factsheets and assisting with community/public meetings over the project duration.

Task 3- Planning, Cleanup, and Final Reporting Task 3 will include finalizing the ABCA and preparing a site cleanup plan and health & safety plan (HASP) that will be reviewed and approved by EPA and KDEP. The site cleanup plan will provide the detailed procedures and schedule of activities for the cleanup alternative selected in the final ABCA. Cleanup planning is anticipated to begin by quarter two of the cleanup grant and cleanup will be conducted in a phased approach. The estimated



budget for KSHC to support cleanup planning and final reporting is \$75,000 in labor. The major aspects and timeline of site cleanup include:

- Quarter 1 and 2, Year 1 – Procurement of a consultant to manage cleanup activities, preparation of final ABCA, site cleanup plan, and HASP. Anticipated cost is \$25,000.
- Quarters 3 & 4, Year 1 – Leveling the depressed area with on-site soils in preparation for surface soil capping activities and conducting confirmatory sampling of clean fill source prior to transportation to the site and removal and disposal of waste piles. Anticipated cost is \$25,000.
- Quarters 3 & 4, Year 1 – LBP abatement in accordance with applicable regulations associated with the rail shop in preparation for redevelopment. Anticipated cost is \$60,000.
- Quarter 1-4, Year 2 – Oversight and Installation of geotextile liner across the surface of the site, transportation and installation of clean fill soil with topsoil, seed, and straw across the property. Anticipated cost is \$4,520,520.
- Quarter 1, Year 3 – Environmental covenants and property management plans will be prepared and supplemented to place restrictions or prohibitions on the use of groundwater and soil in contaminated areas; groundwater at the property will not be used for drinking water. This task includes inspection/maintenance for 2 years. Anticipated cost is \$30,000.
- Quarter 2, Year 3 – At the completion of the cleanup, a summary of activities will be prepared for inclusion in a final cleanup closure report. KSHC anticipates that KDEP and EPA will review each phase of the cleanup process and a final report will be prepared at the completion of the cleanup and grant period of performance. Anticipated cost is \$25,000.

3.b.iii. Task/Activity Lead: The KSHC has identified a team of qualified personnel to manage and implement the EPA cleanup grant. All activities under the grant will be managed and overseen by the Project Director, who will ensure that the team conducts all tasks under the cleanup grant in accordance with applicable EPA brownfields requirements and other state and federal laws. Our project leads by task and a summary of their qualifications are presented below. **Project Director** – Mr. Chris Campbell, President of KSHC, will lead Task 1, overseeing the grant and all project activities. He has over 10 years of experience managing redevelopment projects and spearheaded bringing the KRHC to Irvine. **Community Involvement Coordinator (CIC)**– Joe Crawford (Executive Officer), will lead Task 2 and serve as the CIC. He will work with BGADD Community Development Specialist, Greyson Evans, the Project Director and the QEP. The team will gather information from the stakeholders and prepare a CIP that outlines KSHC’s plan for meaningful community involvement throughout the 4-year grant and cleanup process. KSHC will procure a **Qualified Environmental Professional (QEP)** through a competitive bid process to oversee the technical aspects of the cleanup grant. The QEP will lead Task 3 and have experience with grant management, remedial investigation, environmental cleanup, and redevelopment and reuse. The QEP will procure an experienced remedial subcontractor through a competitive bid process. The subcontractor will report directly to the QEP.

3.b.iv. Outputs: The project team will meet on a monthly basis throughout the 4-year duration of the cleanup grant to monitor progress for all outputs. KSHC anticipates the following outputs for the cleanup grant: Procurement of a QEP will occur in Quarter 1 of Year 1, followed by: site cleanup plan outlining tasks, activities, how they will be implemented, and milestones; final ABCA submitted with the site cleanup plan. A community involvement plan (CIP) describing how project stakeholders (local, state, and federal entities, residents, businesses, and community groups) will be involved, provide meaningful input, and receive progress updates throughout the 4 years. Factsheet distribution at community meetings and to all stakeholders on the mailing list will occur quarterly throughout the 4 years. The ACRES database will be updated quarterly, throughout all 4 years and duration of redevelopment. Reports to the EPA project officer to provide updates on the outputs and costs



expended will be submitted quarterly for the 4-year cleanup grant period. In Quarter 4 of Year 4, final cleanup reporting to EPA and KDEP for review and approval will occur, followed by processing a deed restriction and updating a property management plan with KDEP for areas where contamination may be managed in place. A final report upon completion of all cleanup grant activities will be provided to the EPA project officer in Quarter 4 of Year 4.

3c. Cost Estimates

The budget table below provides a breakdown of how the \$4,999,520 cleanup funding will be utilized and estimates costs for each task associated with the successful implementation and completion of the EPA Cleanup Grant. As noted in the table, KSHC is requesting a Cleanup Grant in the amount of \$4,999,520. The preceding sections describe the tasks.

Budget Categories	Project Tasks			
Programmatic Costs	Task 1: Project Management & Reporting	Task 2: Community Involvement & Engagement	Task 3: Planning, Cleanup & Reporting	Totals
Personnel	\$50,000	\$60,000	\$75,000	\$185,000
Travel	\$9,000	\$0	\$0	\$9,000
Supplies	\$5,000	\$5,000	\$0	\$10,000
Contractual*	\$60,000	\$50,000	\$4,685,520	\$4,512,520
Total Direct Costs	\$124,000	\$115,000	\$4,760,520	\$4,716,520
Indirect Costs	\$0	\$0	\$0	\$0
Total Budget	\$124,000	\$115,000	\$4,760,520	\$4,999,520

3d. Measuring Environmental Results

The environmental results will be measured by evaluating the following anticipated outcomes of site cleanup activities: an estimated 26.96 acres of formerly contaminated or impacted property will be remediated to cleanup levels acceptable for use as education sites, fitness trails, picnic areas and campsites. Permanent jobs will be generated, including on-site maintenance staff, technical educators, museum staff, retail workers, and restaurant workers at the property, as well jobs at supporting businesses in the surrounding areas.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

4.a.i. Organizational Structure & 4.a.ii. Description of Key Staff: The KSHC is a non-profit 501(c)3 organization that promotes vocational education and restoration of rail equipment, including the restoration to operation of Chesapeake and Ohio Railway Steam Locomotive 2716. Site restoration will prove to be living history and will serve as an educational tool, enhancing heritage, tourism, and stimulating economic growth. The KSHC is undertaking the community-backed redevelopment and reuse of the CSX Ravenna Rail Yard as the KRHC project and has formed partnerships with CSX and Estill County to bring the project to fruition. Chris Campbell, President of KSHC, will serve as **Project Director**. Mr. Campbell has a degree in Business Administration and extensive experience in project management and fundraising. He has served as executive director and chief financial officer on several projects in Irvine and Estill County including as project manager for the \$500,000 EPA Brownfields Cleanup Grant awarded to KSHC for the 10.62-acre property at 499 Kirkland Avenue that supported the cleanup and redevelopment of the current amphitheater. The previous cleanup grant is now going through closeout and was successfully completed ahead of schedule. Mr. Campbell will oversee the overall project activities and performance and will be responsible for reporting to the EPA.



Joseph Crawford will be the **Executive Officer** for this KHSC Brownfields Cleanup Grant. He served successfully as the Executive Officer for the former EPA Brownfields Cleanup Grant on the 499 Kirkland Avenue amphitheater property. For the last 15 years, Mr. Crawford, a native of Estill County, has served as the Executive Director for Estill Development Alliance (EDA). He has a Bachelor of Science degree in economics and recently served as project manager for the EPA Brownfield Cleanup Grant awarded to The River City Players, a division of the EDA, for the cleanup and redevelopment of the Mack Theater. Mr. Crawford oversaw the project and successfully led the \$200,000 grant to completion several months ahead of schedule. He also will serve as the **Community Involvement Coordinator** (CIC) for the KRHC project and will ensure that all project stakeholders are afforded meaningful participation in grant activities. Greyson Evans, Bluegrass Area Development District (BGADD) Community Development Specialist, will serve as **Project Coordinator** for the CSX Ravenna Rail Yard project. He will assist with fostering regional strategies, solutions, and partnerships that improve the overall quality of life for the citizens in the BGADD area. Mr. Evans has a BA degree in Politics/Government, a Master of Public Administration, and has administered multi-million-dollar projects with multiple funding sources on several occasions. He is familiar with large renovation projects and will bring leadership, and full resources of the Community Planning Department to support this project by ensuring we appropriately acquire additional resources, as needed, to successfully complete the project. In addition, Estill Development Alliance has several members available to assist with operations of the grant, as appropriate, and has grown substantially in engagement capacity and service provision since its inception in 1995. The Estill Development Alliance has evolved from a stand-alone community development nonprofit into a dynamic, multi-faceted hub improving the quality of life for all residents within Irvine and Estill County.

4.a.iii. Acquiring Additional Resources (5): KRHC has policy and procedures in place to properly procure contracted assistance for the cleanup grant. KRHC will follow all appropriate procurement processes per EPA policy and associated provisions in EPA's Solicitation Clauses. KRHC is committed to economic development within the community and will provide careful consideration to local, small, disadvantaged, minority, and woman-owned businesses with expertise in related remedial management of the site.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Cleanup Grant: The KSHC received a \$500,000 EPA Brownfields Cleanup Grant. KSHC also received a \$120,000 loan/grant from the KDEP CCF through their EPA RLF. All requirements of both were successfully completed including preparation and implementation of the Corrective Action Plan, CIP, ABCA, and QAPP.

(1) Accomplishments: Operating under the Brownfield Cleanup Grant and the CCF Brownfield Grant, KSHC has made the following accomplishments thus far: completed cleanup in tandem with private developer invested amphitheater infrastructure that is now in operation and generating revenue within budget and ahead of schedule; conducted project management including required reporting and funding management; prepared operated under an approved ABCA; prepared and is operating under an approved Property Management Plan with KDEP Brownfield Program; prepared and operated under a CIP; prepared and operated under an approved QAPP; prepared and operated under an approved Corrective Action Plan. The ACRES database reflects the outputs of this grant and will be updated throughout the redevelopment process.

(2) Compliance with Grant Requirements: KSHC has complied with the work plan, schedule, all terms and conditions, and reporting requirements for all past grants, including the recent \$500,000 EPA Brownfields Cleanup Grant and the \$120,000 RLF loan. KSHC expended all the funds from the previous \$500,000 EPA Brownfields Cleanup Grant and the \$120,000 RLF loan before the end of the period of performance for that grant, which completed the cleanup of the 10.62-acre area designated for redevelopment of "The Yard" onsite amphitheater with restaurant/brewery and concert/event venue that is now operational and generating revenue.

**Documentation of All Applicable Threshold
Criteria and Other Attachments**

Threshold Criteria

1. Applicant Eligibility:

- a. Eligible Entity: KSHC is a 501(c) 3 non-profit corporation in good standing with the Commonwealth of Kentucky. Non-profit documentation is presented in the attachments.

2. Information on Previously Awarded Cleanup Grants:

- a. KSHC affirms that the proposed site (503 Kirkland Avenue, Irvine, Kentucky) has not received funding from a previously awarded EPA Brownfields Cleanup Grant.
- b. KSHC received a \$100,000 Cleaner Commonwealth Fund loan from KDEP through their RLF Brownfield Grant for a site located at 499 Kirkland Avenue, Irvine, Kentucky. The loan requirements mirror that of a Brownfield Cleanup Grant and was successfully managed with no adverse audit findings.
- c. KSHC was awarded a \$500,000 Brownfield Cleanup Grant for a site located at 499 Kirkland Avenue, Irvine, Kentucky. The Grant was successfully managed with no adverse audit findings and is currently being closed out.

3. Expenditure of Existing Multipurpose Grant Funds:

- a. KSHC affirms it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership: KSHC is the sole owner of the proposed site at 503 Kirkland Avenue. 503 Kirkland Avenue was sub parceled from a larger property owned by KSHC on October 31, 2023.

5. Basic Site Information:

- a. Name of Site: Kentucky Steam Heritage Corporation Economic Redevelopment Adaptive Reuse Project
- b. Address: 503 Kirkland Avenue, Irvine, Estill County, Kentucky 40336
- c. Current Owner of Site: Kentucky Steam Heritage Corporation (The Applicant)

6. Status and History of Contamination at the Site:

- a. Site Contaminants: The Phase II ESA conducted at the property documented hazardous substances on the site.
- b. Operational History and Current Use: The property operated as a railyard for over 100 years. Currently, the KSHC is planning for multipurpose adaptive redevelopment and reuse of the site. The building on the property was erected with standard building materials used at the time of construction.
- c. Environmental Concerns: Environmental threats include hazardous substances, which are known to cause human health issues.
- d. Causes of Contamination and Nature and Extent: The railyard performed maintenance on railcars that transported coal. Railyard maintenance activities historically involved the use of hazardous materials. The buildings were constructed with building materials deemed acceptable at the time of construction. Based on historical activities associated with the property, it is expected that residual analytes related to railcar repair and coal would be found in areas throughout the property.

7. Brownfields Site Definition:

- a. Is not listed or proposed for listing on the National Priority List;
- b. Is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c. Is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications: For the larger property that 503 Kirkland Avenue was historically associated with, a Final Phase I report (dated July 27, 2018), Final Phase II ESA report (dated July 27, 2018), and the final ABCA were prepared by a qualified environmental professional. For the proposed site at 503 Kirkland Avenue, a Final Phase I report (dated October 16, 2023), Final Phase II ESA report (dated October 26, 2023), and the draft ABCA (dated November 3, 2023) were prepared by a qualified environmental professional.

9. Site Characterization

- a. N/A
- b. Current letter from the Kentucky Department for Environmental Protection is attached. KSHC is currently in the process of enrolling the proposed site into the Kentucky Department for Environmental Protection Brownfield Program. The

Kentucky Department for Environmental Protection certifies in the attached letter that there is sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.

c. N/A

10. Enforcement or Other Actions: There are no known past or current enforcement or other actions related to the proposed site. Freedom of Information Act (FOIA) review of historical files do not reveal any non-compliance issues with KDEP or EPA. KSHC is not responsible for contamination at the proposed site. Furthermore, there were no established Phase I ESA standards when the railyard began operation over 100 years ago.

11. Sites Requiring a Property-Specific Determination: A property-specific determination is not required for the proposed site.

12. Threshold Criteria Related to CERCLA/Petroleum Liability:

(a) Property Ownership Eligibility-Hazardous Substance Sites

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

a. Information on Property Acquisition:

i. How property was acquired: Property was purchased

ii. Date property was acquired: The larger property that 503 Kirkland Avenue was historically associated with was purchased in October 2018. 503 Kirkland Avenue was sub parceled as a separate property with no ownership change on October 31, 2023.

iii. Nature of ownership: Purchased under land contract in October 2018. KSHC has sole ownership.

iv. Party from whom property was acquired: CSX Transportation Inc.

v. Relationships or affiliations with prior owners: None

b. Pre-Purchase Inquiry:

i. The Kentucky Steam Heritage Corporation was awarded a TBA grant by EPA and Phase I and II reports were prepared July 27, 2018, and an ABCA was also prepared for the larger property that 503 Kirkland Avenue was historically associated with. Prior to sub parceling 503 Kirkland Avenue from the larger property, a qualified environmental professional per the AAI standards prepared a Phase I ESA report October 16, 2023, a Phase II ESA October 26, 2023, and prepared an ABCA for the 503 Kirkland Avenue property on November 3, 2023.

ii. Under the TBA grant, an EPA contractor managed the grant for EPA on the larger property. Prior to sub parceling 503 Kirkland Avenue from the larger property, a qualified environmental professional per the AAI standards conducted Phase I and II ESAs and prepared an ABCA for the 503 Kirkland Avenue property in October 2023.

iii. N/A. The Phase I ESAs were not conducted more than 180 days prior to the date the larger property was acquired in 2018 or when the 503 Kirkland Avenue was sub parceled from the larger property in 2023.

c. Timing and/or Contribution Toward Hazardous Substances Disposal: No disposal of hazard substances has occurred at the site since KSHC acquired the property. KSHC has not caused or contributed to any release of hazardous substances at the site. KSHC affirms that we have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

d. Post-Acquisition Uses: Uses since acquisition include maintenance activities for upkeep of the site.

e. Continuing Obligations:

i. No releases are occurring;

ii. The site will not be disturbed to threaten a future release. KSHC will operate under a property management plan in accordance with the KDEP Brownfield program that is currently under development.

iii. Limiting access to the property will prevent exposure to any previously released hazardous substance. KSHC confirms our commitment to:

- i. Comply with land-use restrictions and not impede the effectiveness or integrity of any institutional controls;
- ii. Assist and cooperate with those performing cleanup and providing access to the property;
- iii. Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- iv. Providing legally required notices.

13. Cleanup Authority and Oversight Structure:

- a. Cleanup Oversight: KSHC is currently in the process of entering the proposed site into the Kentucky Brownfields Program and will work with KDEP and EPA to ensure a suitable cleanup is completed. KSHC will acquire the appropriate technical expertise to ensure that cleanup is consistent with competitive procurement provisions of 2 CFR §§ 200.317 through 200.327. KSHC will ensure technical expertise is in place prior to the beginning of cleanup activities.
- b. Access: Access to neighboring properties will not be necessary to carry out the anticipated response activities.

14. Community Notification: The following documents are contained as Attachments:

- a. Copy of the draft ABCA.
- b. Copy of the Community Notification, which was posted to the KSHC's Website and Facebook on October 5, 2023.
- c. Summary of meeting notes from the public meeting held on October 7, 2023 at the proposed site.
- d. Submission of Community Notification Documents and draft ABCA.



Andy Beshear
GOVERNOR

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 Sower Boulevard
Frankfort, Kentucky 40601
Phone: (502) 564-2150
Fax: 502-564-4245

Rebecca Goodman
SECRETARY

Anthony R. Hatton
COMMISSIONER

November 9, 2023

Chris Campbell
President
Kentucky Steam Heritage Corporation
499 Kirkland Avenue
Irvine, Kentucky 40336

Re: Letter of Support for a Brownfield Cleanup Grant

Dear Mr. Campbell:

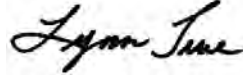
The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the Kentucky Steam Heritage Corporation (KSHC) to remediate and manage the environmental hazards associated with the property located at 503 Kirkland Avenue, Irvine, Kentucky. DEP is the state agency charged by the legislature with the responsibility of implementing the Kentucky equivalent of the federal Superfund program, and as such, is an essential component of any attempt to systematically address brownfields redevelopment.

DEP issues this letter to acknowledge your proposed cleanup project and to affirm the following:

- Based on supporting documentation, KSHC is eligible to enroll in the Kentucky Brownfield Redevelopment and Reuse Program, known as the 415 Program.
- The property located at 503 Kirkland Avenue, Irvine, KY is currently not enrolled in the 415 Program; however, DEP acknowledges that KSHC intends to submit an application for enrollment.
- Based on supporting documentation and upon DEP's approval of a cleanup plan prior to conducting remediation activities, it would be reasonable that the site will be fully characterized to the extent practicable or necessary for the development of an appropriate site remediation plan, and ready to begin remediation by June 15, 2024.

DEP supports your application for a FY24 EPA Brownfields Cleanup Grant and we look forward to continuing our work with your community on this important issue.

Sincerely,

A handwritten signature in black ink that reads "Lynn True". The signature is written in a cursive style with a large initial "L".

Lynn True
Brownfield Coordinator

Cc: Cliff Hall, Division of Waste Management
Richard Thomas, Division of Waste Management, Frankfort Regional Office