

# City of Barbourville

R04-24-M-005

196 DANIEL BOONE DRIVE  
P. O. BOX 1300 • BARBOURVILLE, KENTUCKY 40906  
Phone (606) 546-6197  
Fax (606) 546-4543

## NARRATIVE INFORMATION SHEET

### 1. Applicant Identification

City of Barbourville, P. O. Box 1300, 196 Daniel Boone Drive, Barbourville, KY 40906

### 2. Funding Requested

- a. Grant Type: Multipurpose
- b. Federal Funds Requested: \$1,000,000

### 3. Location

- a. City: Barbourville
- b. County: Knox County
- c. State: Kentucky

### 4. Target Area and Priority Site Information

Target Area: Downtown Business District, defined as a three-block radius around the Knox County Courthouse, 401 Court Square, Barbourville, KY 40906

Census Tract: 21121930500

Priority Sites:

- 116 Knox Street, Barbourville, KY 40906
- 103 Knox Street, Barbourville, KY 40906
- 334 Court Square, Barbourville, KY 40906

### 5. Contacts

Project Director

Corey Moren  
606-546-6197

[cmoren@barbourville.com](mailto:cmoren@barbourville.com)

P. O. Box 1300

196 Daniel Boone Drive  
Barbourville, KY 40906

Chief Executive/Highest Ranking Elected Official

Mayor David Thompson  
606-546-6197

[city@barbourville.com](mailto:city@barbourville.com)

P. O. Box 1300

196 Daniel Boone Drive  
Barbourville, KY 40906

### 6. Population

City of Barbourville population: 3,048  
(source: data.census.gov)

**7. Other Factors**

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	1 and 5
The reuse of the priority site(s) will incorporate energy efficiency measures.	4

**8. Letter from the State or Tribal Environmental Authority**

The Kentucky Department for Environmental Protection letter of support is attached.

**9. Releasing Copies of Applications**

Not Applicable



**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

October 5, 2023

David Thompson  
Mayor, City of Barbourville  
P.O. Box 1300  
Barbourville, Kentucky 40906

Re: Letter of Support for a Brownfield Multipurpose Grant

Dear Mayor Thompson:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the City of Barbourville to identify and clean up brownfield sites in the community. 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. We support your application for a Brownfield Multipurpose Grant and look forward to continuing our work with your community on this important issue.

Sincerely,

Lynn True  
Brownfield Coordinator

Cc: Cliff Hall, Division of Waste Management  
J. Chase Whitis, Division of Waste Management, London Regional Office  
Corey Moren, City of Barbourville

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

### **a. Target Area and Brownfields**

#### **i. Overview of Brownfield Challenges and Description of Target Area**

The 2.72 square miles comprising **the city limits of Barbourville, Kentucky will be the geographic boundary** where eligible activities of this grant may be conducted. Founded in 1799, Barbourville, the seat of Knox County, is a small, rural city located along the Cumberland River in the historic Cumberland Gap area of southeastern Kentucky. In Kentucky, county seats serve as focal points and historically, the commercial centers of the county. County seats typically include a courthouse, jail, and most of the government offices. County seat towns must be maintained for their functional, historical, and cultural value.

The City of Barbourville's predominant economic sectors were coal mining, agriculture, especially tobacco, and manufacturing throughout the 20<sup>th</sup> century. However these industries have severely declined or entirely collapsed. Barbourville, located in the heart of the Blue Gem coal field, was once home to five mines<sup>1</sup>, with many more mines located in Knox and neighboring counties which provided good paying jobs for Barbourville residents. Kentucky coal mining employment has been in freefall for decades. A similar decline in tobacco production, has eliminated what was once a \$1.4 million cash crop for area residents.<sup>2</sup> Another devastating blow to Barbourville's economy has been the outsourcing of manufacturing jobs. During the past 20 years, Barbourville has lost more than 600 jobs with the closure of some of the city's largest manufacturing employers, (Truseal, Warners Warnaco and E.K. Wood Products)<sup>3</sup>. The loss of these jobs was devastating for a town with only 3,048 residents.<sup>4</sup> These critical job losses led to an approximate 20% drop in Barbourville's population and a staggering 35% poverty rate, which is three times the 11.5% national poverty rate<sup>5</sup>.

The **target area** and focus of grant activities will be the **Barbourville Downtown Business District**, defined as a three-block radius around the Knox County Courthouse, and the location of the three priority sites. This target area, located in census tract 21121930502, is a Justice 40 CEJST disadvantaged community. In the late 1990s and early 2000s, Barbourville experienced significant disinvestment in the Downtown Business District as the construction of US Highway 25E, a downtown bypass, became the City's major commercial corridor, leaving many shuttered commercial properties downtown. Barbourville's staggering loss of jobs and population, compounded by the COVID pandemic, led to the closure of many remaining small local businesses, including restaurants, retail stores, gas stations, and dry cleaners, which could no longer sustain themselves. These vacant businesses are falling into severe structural disrepair, contributing not only to blight and lower property values, but leading to dangerous and life-threatening brownfields.

A Multipurpose (MP) grant will help address Barbourville's specific challenges, which are the presence of a structurally deficient building with known hazardous building materials and the presence of vacant commercial properties with potential contamination. Once the nature and extent of contamination is identified, site reuse assessments will determine the most appropriate adaptive reuse of the brownfields and help market them to developers. Additionally, grant funds will be used to develop an overall revitalization plan for the Downtown Business District, focusing on new commercial opportunities and job creation. The revitalization plan will be a valuable tool to create a downtown that is attractive to both investors and residents.

#### **ii. Description of the Priority Brownfield Site(s)**

The key priority brownfield site is known as **The Parker Mercantile Building**, located at 116 Knox Street, on the corner of Knox and Liberty Streets. The Parker Mercantile Building is a 70 x 50 foot, 3-story brick building constructed in 1909 which has historically served as a general store, bank, restaurant, and retail store. At the turn of the century general stores often carried all types of goods including farm chemicals, petroleum products and a wide variety of potentially hazardous chemicals. The property consists of a single

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<sup>1</sup> www.coaleducation.com

<sup>2</sup> Cumberland Valley Area Development District 2022 Five Year Comprehensive Economic Development Strategy

<sup>3</sup> Kentucky Library Research Collections, "Industrial Resources: Knox County – Barbourville."

<sup>4</sup> data.census.gov

<sup>5</sup> data.census.gov

0.08-acre parcel, which is entirely covered by the building's footprint. In late 2021, after being vacant and neglected for many years, the back portion of building suffered a catastrophic collapse with rubble and debris falling onto adjoining Liberty Street, damaging parked cars; it could have easily caused fatalities of local residents.

Action must be taken soon, as the **Parker Mercantile Building** abuts other buildings and may threaten their stability. Following the Phase I and limited Phase II ESA, provided by the Cumberland Valley Area Development District (CVADD) Brownfield Assessment grant, the City of Barbourville acquired the property at a Master Commissioner sale. Due to safety considerations, only a very limited Phase II ESA was conducted which identified lead-based paint (LBP), and mold. A more thorough **Phase II** environmental assessment will be conducted to assess the upper floors, the roof, and the subsurface for asbestos, polychlorinated biphenyls (PCBs), volatile and semi-volatile organic compounds (VOCs and SVOCs), and metals that are commonly associated with chemical and petroleum storage. Community health and safety remain a serious concern.

**Grant funds will be used to further assess and remediate the Parker Mercantile Building.**

The City of Barbourville has identified two additional sites, the former **Blackstone Hotel** and the **Lawson Building**, as priorities for immediate assessment and cleanup. These buildings are strategically situated within the Downtown Business District, are available for purchase, and are showing signs of structural weakness. It is anticipated that these two buildings can be successfully restored if grant funds are awarded. The City intends to purchase both buildings. These three priority properties will serve as catalyst sites for the revitalization plans of the Barbourville Downtown Business District. At a minimum, the following brownfields will be assessed to the greatest extent funding allows, with the **Parker Mercantile Building receiving a Phase II ESA and cleanup**:

- The **Parker Mercantile Building**, located at 116 Knox Street, was constructed in 1909 and has historically served as a general store, bank, and restaurant. Today the building is vacant and nearly collapsed. Known contaminants include LBP, and mold. Suspected contaminants include asbestos, VOCs, SVOCs, metals and PCBs. Further complicating additional assessment, especially subsurface soils is the inability to access any of the site footprint. In accordance with USEPA cleanup grant funding guidance, sites requiring demolition need to be structurally evaluated to confirm that demolition is indeed the only viable means for properly assessing and removing contaminated substances. A licensed Kentucky structural engineer evaluated the building in 2023 and determined that it is not structurally sound and needed to be razed as soon as possible. Subsequently, thru CVADD brownfield grant funds an ABCA was completed confirming that demolition is the best and only site remediation option. The site currently meets all the requirements for USEPA cleanup grant funding.
- The **Blackstone Hotel**, located at 103 Knox Street, (directly across from the Parker Mercantile Building) is a 3-story, approximately 24,000 square foot structure built in the early 1900s. Through the years, it has housed numerous hotels and commercial businesses. Today the upper floors are unusable due to dilapidation and non-repair. The ground floor is divided into different offices; only one is currently occupied. Suspected contaminants include AMC, LBP, and mold.
- The **Lawson Building**, located at 334 Court Square, is a 3-story, 10,200 square foot building constructed in the early 1900s. It has housed different commercial interests over the years, most notably the former Masonic Temple. The building is currently vacant. Suspected contaminants include AMC, LBP, and mold.

iii. Identifying Additional Sites

In the unlikely event that grant funds remain after addressing the three target area priority sites, the City of Barbourville will identify additional sites for eligible activities throughout the geographic boundary. Barbourville is in the process of assembling a Brownfields Advisory Committee (BAC) comprised of community stakeholders and residents. The BAC, with the assistance of the procured qualified environmental professional (QEP), will develop a Brownfield inventory. The services of Environmental Data Resources Inc. will be used to obtain historic Sanborn maps and aerial photographs to identify potential properties of interest or concern. Additionally, aerial drone surveys will be utilized to evaluate current building conditions, including roofs. The sites will be ranked by the BAC for assessment based on several factors, including: 1) eligibility

based on EPA requirements; 2) extent or perception of contamination; 3) redevelopment potential; 4) community input, and 5) location in a disadvantaged or underserved community. According to EPA's EJScreen, the city limits of Barbourville, the geographic boundary of the grant, are located within two census tracts, both of which are classified as Justice 40 CEJST disadvantaged.

**b. Revitalization of the Target Area**

**i. Overall Plan for Revitalization**

The redevelopment of Barbourville's brownfield sites in the Downtown Business District aligns with several regional plans. CVADD's 2022 Five Year Comprehensive Economic Development Plan contains the following related goals and objectives: 1) to preserve and improve the physical environment as a place to live, work, and enjoy life, and 2) to encourage the revitalization and rehabilitation of blighted areas, and 3) to identify and eliminate potential environmental hazards, promote downtown revitalization, and market and upgrade existing buildings for economic growth. The Appalachian Regional Commission's 2022-2026 Strategic Plan, Objective 3.5 "redevelop and repurpose unused, underutilized, or neglected sites, brownfields, and mine-scarred lands to fuel economic and community development" supports the proposed project. Barbourville's redevelopment plans also align with Shaping Our Appalachian Region's<sup>6</sup> Blueprint for the Future of Appalachia, a strategic plan for Eastern Kentucky, goal 7: "Tourism and Downtown Revitalization."

MP grant funds will be utilized to develop a target area-wide Brownfield Revitalization Plan. Revitalization plans are formulated to stimulate economic redevelopment and build a more vigorous Business District with a focus on historical and economic adaptive reuse of legacy Brownfields. Barbourville wishes to refocus development downtown, creating employment opportunities and attracting new, related businesses. Following the demolition of the **Parker Mercantile Building**, the City may use the site to create a small park/greenspace. The former **Blackstone Hotel** and the **Lawson Building** need environmental assessment, but are well suited as first floor commercial space and upper floor residential units. In addition to an overall revitalization plan, grant funds will be used to develop a Site Reuse Assessment of each priority property. Actual reuses will be determined after careful consideration of these plans along with public comments.

The City will properly procure in accordance with Federal Acquisition Requirements (FARs) the services of a professional planning firm to develop the Site Reuse Assessments and Revitalization Plan. The city will work closely with the planners, community members, and the BAC to ensure that the plans result in practical strategies which can be feasibly implemented. The Revitalization Plan will be a valuable tool to map the future redevelopment of the Downtown Business District. The proposed revitalization efforts will not cause business or residential displacement, as the sites are either vacant or severely underutilized. Rather, redevelopment efforts would create an investment-friendly environment to support the revitalization of the Business District and help reverse the job and population loss that Barbourville continues to grapple with.

The target area is in a federally designated Opportunity Zone, which will encourage developers to invest in the remediated brownfields. Additional new businesses in the target area will increase traffic to existing businesses. This reuse plan is in accordance with the City of Barbourville's zoning ordinances.

In summary, an MP is ideal for the City of Barbourville as it has an immediate need for cleanup at the Parker Mercantile Building and has identified two additional priority sites in need of assessment. Additionally, the Brownfield Revitalization Plan will be instrumental in long-term planning by identifying the best adaptive reuse for the priority sites and other target area brownfields to complete the redevelopment of Barbourville's Downtown Business District. MP grant funds will be used for assessment, cleanup, and planning.

**ii. Outcomes and Benefits of Overall Plan for Revitalization**

The EPA MP grant, will have many significant short- and long-term benefits for the small, rural community of Barbourville. The proposed adaptive reuse of the three catalyst sites will spur redevelopment where it is most needed, the Downtown Business District and county seat of Knox County. Over the long

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<sup>6</sup> Shaping Our Appalachian Region is an economic development and community revitalization organization headquartered in Eastern Kentucky. The group meets regularly in Knox and other counties to discuss and implement local and regional plans.

term, a mix of commercial, residential, and public use buildings will be centered around the town square county courthouse. In particular all public-use buildings must be maintained and remain safe. In the short term the **Parker Mercantile Building** must be razed and, based on the Brownfield Revitalization Plan may be developed into greenspace. This building is the most time-sensitive project in Knox County. After it is razed, the community will again feel safe to be downtown which will nearly automatically reinvigorate the business district. Once a liability and safety hazard, the remediated property and possible greenspace/park will serve as a gateway into the business district. Also, in the short term, and after conducting Phase I ESAs, the city plans to purchase the **Blackstone** and **Lawson** buildings for adaptive reuse into commercial and residential units supporting the Knox County courthouse. In the longer term the Brownfield Revitalization Plan will serve as the roadmap to future assessments, cleanups, and development.

The assessment, clean-up, and reuse of identified brownfields along with the anticipated improvement of economic conditions will create local jobs, decrease poverty, increase the declining population, and improve human health and the environment. In the short term, temporary construction, trade, and skilled labor jobs will be created during the remediation and renovation phases. Reuse of the three priority sites will create an anticipated 20 new, permanent jobs, providing residents with employment opportunities, and the City with additional occupational tax revenue. Increased property values will generate increased property taxes for the City. The grant will facilitate the preservation of underutilized properties by repurposing existing buildings. Community brownfield education and environmental stewardship will be both short and long-term outcomes.

Specific anticipated **outcomes** include: 1) a safer Downtown, 2) creation of greenspace, 3) engaged community environmental stewardship, 4) job creation, 5) more vibrant courthouse square, 6) reduced poverty, 7) improved health metrics, 8) additional residential units, 9) increase in population, and 10) new businesses.

With a focus on environmental stewardship, we anticipate that priority site renovations undertaken by Barbourville will implement energy efficiency measures, such as solar panels, LED lighting, and low-flow toilets to the greatest extent feasible. Additionally, the City will help educate developers of the environmental and financial benefits of renewable energy and energy efficiency measures. Utility companies and appliance manufacturers routinely offer rebates. The United States Department of Agriculture (USDA) has offers matching grants for the installation of solar panels which are even available to private business.

### **c. Strategy for Leveraging Resources**

#### **i. Resources Needed for Site Reuse**

The City of Barbourville is fully aware that Brownfield funds can only serve as a starting point for revitalization. With the assistance of the CVADD, Barbourville will apply for various state and federal funds to supplement Brownfield funds. Tying together various funding sources, including private investment, is part of our overall funding strategy. However, critical to this strategy is the Brownfield funds that often serve as the up-front, first-step in redevelopment. Barbourville has carefully evaluated the use of these grant funds and does not anticipate the need for additional funds to complete the environmental site assessments of the priority sites or cleanup of the Parker Mercantile Building. However, if the need arises, the City will apply for Targeted Brownfield Assessments grants through EPA or the Kentucky Brownfields Program. The City of Barbourville and private investors may seek leveraged funds from numerous grants, loans, and incentives for remediation and subsequent reuse. Potential funding sources include the following:

- **Kentucky 415 Program (State Brownfield Program):** Offers liability protection for new owners who have completed a Phase I and Property Management Plan.
- **Cleaner Commonwealth Fund:** Low-interest/partially forgivable loans for brownfield cleanup
- **KDWM Superfund Branch Tax Incentive Program:** Offers 95% reduction in state property/ad valorem tax and up to \$150k in income tax credits for Brownfield cleanup costs for up to 10 years.
- **USEPA Brownfield Cleanup Grants:** Funds remediation of contaminants. Barbourville, as a unit of government, is eligible to apply.
- **Appalachian Regional Commission:** Knox County is classified as “Distressed” which entitles Barbourville to the highest percentage of ARC funding. Brownfields redevelopment is an eligible activity.

- **Economic Development Administration Economic Adjustment Assistance:** Funds job creating projects in economically distressed areas.
- **HUD Community Development Block Grant:** Offers grants for projects that benefit low to moderate income persons and/or eliminate slum and blight.
- **Opportunity Zone Tax Incentive:** Qualified Opportunity Zones (QOZ) offer tax incentives on capital gains invested in economically distressed census tracts. The target area is in a QOZ.
- **Local Tax Incentives:** The City of Barbourville is currently exploring possible incentives to further promote private investment, such as offering a one-year property tax exemption to investors who purchase and renovate brownfields in the Downtown Business District.

In addition to the loans and incentives mentioned above, entities such as the Kentucky Small Business Development Center (KSBDC), Mountain Association for Community Economic Development (MACED), and Southeast Kentucky Economic Development Corporation (SKED) provide valuable services to small businesses. The KSBDC offers one-on-one coaching at no cost to Eastern Kentucky entrepreneurs, and meets the educational needs of the local small businesses by offering a variety of low-cost training programs taught by industry experts. MACED is a community Development Financial Institute and non-profit which lends to those who might not qualify for traditional bank financing. SKED helps large and small businesses with business lending, marketing training, expansion, and recruitment.

ii. Use of Existing Infrastructure

All priority sites are sufficiently equipped with the necessary infrastructure, such as water, sewer, electricity, natural gas, broadband, and access to transportation to support commercial / retail use of the priority sites. Barbourville is protected from flooding by flood gates constructed in 1977. Redevelopment of vacant brownfields will facilitate the use of existing infrastructure by creating new customers which will in turn generate additional revenue to finance future maintenance and improvements. No future infrastructure upgrades will be needed for reuse of the priority sites. Should utility providers choose to make improvements, funding is available through the Kentucky Infrastructure Authority (KIA) State Revolving Loan Fund, KIA Cleaner Water Fund, ARC, and USDA Rural Development.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

i. The Community’s Need for Funding

MP grant will provide the funds necessary to conduct much-needed ESAs, cleanup and long-term reuse planning. The City lacks the financial resources to independently undertake these activities. Barbourville is small, with just over 3,000 residents, 35% of whom are at or below the poverty rate. Jobs losses have reduced the City’s occupational tax revenue to a critical level. Lowered property tax values due to brownfields has reduced revenue received from property taxes. Raising the tax rate to fund a Brownfield program would overburden their small, low-income population. According to EPA’s EJScreen, the Downtown Business District is in a Justice 40 CEJST disadvantaged census tract and an EPA IRA Disadvantaged Community. Barbourville is located in Knox County which is a Persistent Poverty County, defined as a county with a poverty rate of 20% or more for the past 30 years. Additionally, Knox County, including Barbourville, is classified as one of only 82 “distressed” counties out of the 423 counties in the ARC region. The table below illustrates the economic disparity faced by Barbourville residents as compared to the state and nation:

<b>Economic Indicators of Need</b>	<b>Barbourville</b>	<b>Kentucky</b>	<b>U. S.</b>
Population	3,048	4,512,310	333,287,557
2022 Annual Unemployment Rate	5.3%	3.9%	3.6%
Poverty Rate	35.6%	16.5%	11.5%
Median Household Income	\$47,283	\$55,573	\$69,021

Sources: [kystats.ky.gov/KYLM/](http://kystats.ky.gov/KYLM/), [censusreporter.org](http://censusreporter.org), and U. S. Census Bureau Quickfacts



ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Sensitive populations are especially vulnerable to health threats from brownfield contaminants due to other health conditions, compromised immune systems and/or lack access to adequate health care. Knox County is Medically Underserved.<sup>7</sup> As indicated in the table below, the primary sensitive populations in the target area are older adults, adults with less than a high school education, and those in poverty, including a high percentage of children:

<b>Sensitive Population</b>	<b>Barbourville</b>	<b>Kentucky</b>	<b>U.S.</b>
Age 65 or older	21.9%	17.6%	17.3%
High School graduate or more	79.6%	87.7%	88.9%
Poverty Rate	35.6%	16.5%	11.5%
Children under age 18 living in poverty	68.9%	21.4%	16.9%

Sources: *censusreporter.org* and *U. S. Census Quickfacts*

The priority sites are believed to be impacted by PCBs, ACM, LBP, and mold. These toxins are linked to cancer and skin, respiratory and neurological disorders. (Greater detail of health impacts is described in the following section).

Sensitive populations are not only more susceptible to the effects of contaminants, but are more likely to experience exposure through soil, air, and groundwater. For example, Barbourville is ranked at the 71<sup>st</sup> percentile in the state and 58<sup>th</sup> in the nation for lead paint ([www.epa.gov/ejscreen](http://www.epa.gov/ejscreen)). The 68.9% of children living in poverty are more likely to live in the older, pre-1960s homes where lead paint would be found. Lead is extremely dangerous to the neurological development of children.

Assessment of the brownfield sites will identify the nature and extent of contamination so residents can be aware of these risks. Subsequent clean-up will eliminate these adverse health threats. Therefore, this grant will directly facilitate the identification and reduction of threats to the health and welfare of the sensitive population who live, work, or play in the target area.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Due to age and condition of the structures, the primary suspected contaminates in the priority sites are asbestos containing material (ACM), lead based paint (LBP), polychlorinated biphenyls (PCBs) and mold. Assessment provided through this grant may identify additional hazardous substances. Asbestos exposure is linked to asbestosis, pleural disease, mesothelioma, lung and other cancers. In children, there is no identified threshold or “safe” blood lead level without risk of adverse neurological effects. Mold, at a minimum, exacerbates allergies, asthma and other respiratory problems. PCB exposure induces adverse dermal effects, such as folliculitis, dermatitis and chloracne.<sup>8</sup>

Knox County ranks 106<sup>th</sup> out of Kentucky’s 120 counties as the least healthy county according to [countyhealthrankings.org](http://countyhealthrankings.org). EPA EJScreen ranks the target area in the 91<sup>st</sup> percentile in the nation for adult **asthma** and 81<sup>st</sup> percentile for heart disease. Barbourville’s prevalence of lung and bronchus **cancer** at 116 cases per 100,000 people is more than twice the nation’s prevalence of 57.3 cases per 100,000 people.<sup>9</sup>

Remediation of contaminants at the Parker Mercantile Building will reduce the population’s exposure to harmful substances. Assessments of the other priority sites is the essential first-step toward their cleanup. The disproportionate incidences of disease and other poor health outcomes experienced by target area residents will be reduced as exposure to contaminants is reduced.

(3) Environmental Justice

(a) Identification of Environmental Justice Issues

<sup>7</sup> [data.hrsa.gov](http://data.hrsa.gov)

<sup>8</sup> [Atsdr.cdc.gov](http://atsdr.cdc.gov)

<sup>9</sup> [statecancerprofiles.cancer.gov](http://statecancerprofiles.cancer.gov)

The City of Barbourville suffers from multiple environmental challenges. According to EPA EJScreen, the City of Barbourville, including the Downtown Business District and all priority sites, is located in a "Justice40 (CEJST)" disadvantaged community. EJScreen Environmental and Socioeconomic Indicators Data ranks the target area at or above the 50<sup>th</sup> percentile compared to the state and/or nation in the following twelve environmental justice variables:

<b>SELECTED VARIABLES</b>	<b>% TILE IN STATE</b>	<b>% TILE IN USA</b>
Air Toxics Cancer Risk* (lifetime risk per million)	45	<b>52</b>
Traffic Proximity (daily traffic count/distance to road)30	<b>50</b>	30
Lead Paint (% Pre-1960 Housing)	<b>71</b>	<b>58</b>
Underground Storage Tanks (count/km <sup>2</sup> )	<b>56</b>	41
Wastewater Discharge (toxicity-weighted concentration/m distance)	<b>88</b>	<b>81</b>
Demographic Index	<b>57</b>	44
Supplemental Demographic Index	<b>81</b>	<b>83</b>
Low Income	<b>71</b>	<b>80</b>
Unemployment Rate	<b>93</b>	<b>93</b>
Less Than High School Education	<b>73</b>	<b>79</b>
Over Age 64	<b>56</b>	<b>92</b>
Low Life Expectancy	<b>82</b>	<b>92</b>

The reader is reminded of the previous example regarding the 68.9% of children living in poverty who are more likely to reside in the pre-1960s homes where the higher percentile of lead paint would be found, which is not only a sensitive population issue, but an environmental justice issue.

**(b) Advancing Environmental Justice**

This grant, resulting in the cleanup of the Parker Mercantile Building and assessments leading to future remediation, will advance environmental justice by improving environmental conditions and reducing chronic diseases. The development of a revitalization plan will provide the City with tools needed to foster economic development in the Downtown Business District. The creation of small businesses and additional jobs will improve the unemployment rate and poverty rate. As residents’ economic status improves, they will improve their housing conditions, reducing contaminant exposure at home. Reduced exposure to lead will improve neurological development and may even contribute to increased high school graduation rates. An attractive, vibrant downtown will help recruit younger generations to make Barbourville their home.

No businesses or residents will be displaced because of this project. Two of the priority sites are totally vacant. The one active business, a coffee shop, located in an underutilized priority site will benefit from the additional traffic that other businesses will bring to the target area. Creation of safe, affordable housing units will help to retain, rather than displace, residents in the target areas.

**b. Community Engagement**

**i. Prior/Ongoing Community Involvement**

The City of Barbourville widely advertised, through the local newspaper, radio and social media, the availability of the Parker Mercantile Building’s Phase I Environmental Site Assessment Report for public review. Additionally, the public was notified of the City’s intention to apply for an EPA Multipurpose grant. Residents were invited to recommend brownfield sites for assessment or make suggestions regarding potential redevelopment of sites. To make input as convenient as possible, comments are accepted in person, by email, postal mail or telephone. The City is aware that the community involvement is vitally important to the success of this project, and will continue to make every effort to solicit public input.

ii. and iii. Project Involvement and Project Roles

The City of Barbourville will utilize the Brownfields Advisory Committee (BAC) to assist in site selection, and reuse planning of brownfield sites. A diverse group of community stakeholders from the geographic boundary and target area will be involved in the decision-making process, including city officials, business owners, community leaders, property owners, and residents. The primary community partners and their specific roles in the project are listed in the table below:

<b>Name of Organization</b>	<b>Contact Information</b>	<b>Involvement or Assistance</b>
Cumberland Valley Area Development District	Susanna Cornett, 606-864-7391 scornett@cvadd.org	Provide grant management and technical assistance
Knox County Health Department	Rebecca Rains, Director 606-546-3486	Health monitoring as needed and Serve on Advisory Committee
First Baptist Church (community-based organization)	Pastor Tyler Shields 606-546-3636	Will provide meeting space and assist with community outreach
East Barbourville Baptist Church (community-based organization)	Pastor Josh Smith 606-546-5912	Will provide meeting space and assist with community outreach
Barbourville Jr. Women's Club (community-based organization)	Frankie Abner, President 606-546-3171	Serve on Advisory Committee and assist with community outreach
Barbourville Tourism	Marcia Dixon, 606-545-9674 <a href="mailto:mdixon1@barbourville.com">mdixon1@barbourville.com</a>	Serve on Advisory Committee and assist with revitalization planning
Knox County Chamber of Commerce	Claudia Greenwood, Exec. Dir. 606-546-4300	Serve on Advisory Committee and assist with revitalization planning

While their roles are similar, each organization will bring unique perspectives to the Advisory Committee and will connect with different audiences with their community outreach.

iii. Incorporating Community Input

The City of Barbourville will follow the EPA’s Steps for Effective Public Involvement that include conducting outreach activities, reviewing and incorporating public input, and providing feedback. A *Community Involvement Plan* (CIP) will be developed during the first quarter and updated throughout the grant period. The City of Barbourville will use their own and partner agencies’ websites, social media, radio, local newspapers, and informational brochures to convey project progress, advertise public meetings/webinars and solicit input from target area residents. These methods will accommodate those who have visual or hearing impairments. Partner agencies will share project information with their membership which will reach a broad spectrum of community members. The City will make every effort to provide all residents equal access to the decision-making process. BAC meetings will be accessible via Zoom or similar platform for the convenience of those who are unable to attend in person. Letters, phone calls and emails will be accepted methods for receiving input from residents who do not attend BAC meetings. All questions and concerns will receive a considered response within 10 business days. Workplans and quarterly reports will be available to the public upon request. Meetings will be held in American Disabilities Act (ADA) accessible locations. Interpretation services will be provided with advance notice. The City of Barbourville has employed these communication strategies in past, and are assured that this plan is the most appropriate and effective for the its residents.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Description of Tasks/Activities and Outputs**

**NOTE:** The City of Barbourville is aware that Multipurpose grants must be completed within five years. However, due to the degree of prior assessments conducted on the Parker Mercantile Building, the City fully expects to complete the grant in **three** years. Project outputs and schedule reflect a 3-year period.

**Task 1: Project Management & Reporting**

<p>i. Project Implementation: EPA-funded tasks/activities: Grant subrecipient, Cumberland Valley Area Development District (CVADD), will provide primary project management, reporting, and financial administration. The Qualified Environmental Professional (QEP) will assist with compliance reporting (quarterly and final reports, ACRES updates, annual Disadvantaged Business Enterprise [DBE] and Financial Reports, etc.) and other eligible project activities. The City of Barbourville is responsible for EPA Cooperative Agreement and will oversee CVADD and QEP activities. A Barbourville staff person will attend at least three Brownfields conferences.</p>
<p>ii. Anticipated Project Schedule: Activities will be ongoing throughout the project period.</p>
<p>iii. Task/Activity Lead: City of Barbourville with assistance from CVADD and the QEP.</p>
<p>iv. Outputs: 12 Quarterly Reports; 1 Final Performance Report; 3 DBE Utilization Reports; 3 Federal Financial Reports; ACRES updates; 3 brownfield conferences</p>
<p><b>Task 2: Community Involvement</b></p>
<p>i. Project Implementation:                      EPA-funded tasks/activities: The City of Barbourville with significant assistance from CVADD and the QEP will develop a community involvement plan (CIP), prepare outreach materials, convene quarterly Brownfields Advisory Committee (BAC) meetings and develop a brownfields inventory. BAC will distribute brownfields educational material.                      Non-EPA grant resources needed: Meeting space will be provided by community partner organizations.</p>
<p>ii. Anticipated Project Schedule: CIP completed in 1<sup>st</sup> quarter; outreach material distribution and quarterly BAC meetings throughout the project period. Site nominations will be accepted and inventory updated throughout the project term to assist with future brownfield projects</p>
<p>iii. Task/Activity Lead: Barbourville with support from CVADD, QEP and BAC</p>
<p>iv. Outputs: 1 CIP; 1 inventory, 12 RBC meetings; 1,000 Brownfields informational material</p>
<p><b>Task 3: Site Assessments</b></p>
<p>i. Project Implementation:                      EPA-funded tasks/activities: QEP will prepare a Generic Quality Assurance Plan (QAPP), Site Eligibility Determination (SED) requests, conduct 2 Phase I ESAs in accordance with the AAI Final Rule and the ASTM E1527-21, and 3 Phase II ESAs.</p>
<p>ii. Anticipated Project Schedule:                      Year 1: 1 Grant Generic QAPP, 1 Phase II ESAs (Parker Building) with 1 SED                      Year 2: 2 Phase I ESAs (Blackstone and Lawson Buildings)                      Year 3: 2 Phase II ESAs (Blackstone and Lawson Buildings), with 2 SEDs</p>
<p>iii. Task/Activity Lead: QEP will lead all technical activities with oversight by the City of Barbourville.</p>
<p>iv. Outputs: 1 Generic QAPP; 1 HASP, 2 Phase I ESAs; 3 Phase II ESAs (with SEDs)</p>
<p><b>Task 4: Cleanup &amp; Reuse Planning</b></p>
<p>i. Project Implementation:                      EPA-funded tasks/activities: The QEP will prepare two Health and Safety Plans (HASPs) – one for the target area and one specifically for Parker Mercantile remediation. QEP will develop 3 Site Specific QAPPs and 3 Analysis of Brownfields Cleanup Alternatives (ABCAs) for each site selected for a Phase II ESA. A professional planning firm will be procured to compile 3 Site Reuse Assessments, one for each priority site, and an overall target area wide Brownfields Revitalization Plan.                      Non-EPA grant resources needed: government agency and community cooperation and participation</p>
<p>ii. Anticipated Project Schedule:                      Year 1: 1 Brownfields Revitalization Plan, 1 SSQAPP, 1 ABCA (Parker Mercantile Building). 2 HASPs                      Year 2: 1 SSQAPP and 1 ABCA for Blackstone Hotel; 2 Site Reuse Assessments (Parker and Blackstone)                      Year 3: 1 SSQAPP, 1 ABCA, 1 Site Reuse Assessment (Lawson Building)</p>

iii. Task/Activity Lead: QEP and planning firm with oversight from Barbourville and significant assistance and input from target area residents
iv. Outputs: 2 HASPs, 3 SSQAPPs, 3 ABCAs, 1 Brownfield Revitalization Plan, 3 Site Reuse Assessments
<b>Task 5: Remediation</b>
i. Project Implementation: EPA-funded tasks/activities: QEP will prepare plans and technical specifications for public bidding by remedial contractors for the cleanup of the Parker Mercantile Building located at 116 Knox Street, Barbourville, Kentucky. Costs include removal of building structures containing ACM, LBP and other contaminants. Major tasks include remediation activities and soil transportation, disposal costs, backfill, dust and erosion controls and temporary fencing. QEP will provide contractor oversight, conduct personal protection air monitoring and air clearance sampling by related to asbestos abatement.
ii. Anticipated Project Schedule: Year 1: File State Historic Preservation Office (SHPO) No-Significant Impact Request Year 2: (1) Technical Demo Specifications/Bid Package (Parker Mercantile Building), Select Abatement Contractor and complete abatement. <b>(This is a time-sensitive activity due to the building condition).</b> Cleanup activities will begin during the 3 <sup>rd</sup> quarter of year 2 and completed by 4 <sup>th</sup> quarter of year 2.
iii. Task/Activity Lead: Procured remedial contractor with technical oversight by QEP and general oversight by the City of Barbourville
iv. Outputs: 1 Plans and Technical Specifications, daily field logs, oversight reports, Parker Mercantile building site remediation, Cleanup Report and Closure Certification by the QEP.

\*Again, the city anticipates all tasks to completed in a **three-year** project performance period.

**b. Cost Estimates**

Budget Categories	Task 1 Project Management	Task 2 Community Involvement	Task 3 Site Assessments	Task 4 Cleanup & Reuse Planning	Task 5 Remediation	Total
Personnel	\$3,500	\$7,000	\$3,500	\$3,500	\$3,500	\$21,000
Fringe	\$1,500	\$3,000	\$1,500	\$1,500	\$1,500	\$9,000
Travel	\$4,500					\$4,500
Contractual	\$28,600	\$28,150	\$85,000	\$147,000	\$81,750	\$370,500
Construction					\$545,000	\$545,000
Other - CVADD	\$40,000	\$10,000				\$50,000
<b>Total Direct Costs</b>	<b>\$78,100</b>	<b>\$48,150</b>	<b>\$90,000</b>	<b>\$152,000</b>	<b>\$631,750</b>	<b>\$1,000,000</b>
Indirect Costs	0	0	0	0	0	
<b>Total Budget</b>	<b>\$78,100</b>	<b>\$48,150</b>	<b>\$90,000</b>	<b>\$152,000</b>	<b>\$631,750</b>	<b>\$1,000,000</b>

**Task 1 Project Management:** City personnel management oversight is \$50/hour (\$35 personnel and \$15 fringe) X 100 (20 hours per year) = \$5,000. These are programmatic costs which are not included in the 5% indirect cap. Travel expenses are based on one city employee attending three Brownfields conferences at \$1,500 per trip (\$200 registration fees; \$600 lodging for 3 nights @ \$200/night, \$400 roundtrip airfare, and \$300 per diem expenses for 3 days @ \$100 per day = \$1,500 per trip). Contractual in the amount of \$28,600 is allocated for the QEP to assist in drafting reports, updating ACRES, and other project management activities (\$130 per hour for 220 hours over the project period). \$40,000 is allocated for salary/fringe reimbursement for subrecipient, CVADD. **Total: \$78,100**

**Task 2 Community Involvement:** City personnel costs at \$50/hr (\$35 personnel and \$15 fringe) X 200 hours = \$10,000. Detailed contractual costs for this task are drafting the Community Involvement Plan @ \$3,650, developing and updating the inventory @ \$5,000, and preparing for and attending RBC meetings @ \$19,500 (\$130 per hour x 150 hours). CVADD will receive \$10,000 for preparation of Brownfield educational materials and RBC meeting planning and attendance. **Total: \$48,150**

**Task 3 Site Assessment:** City personnel management oversight is \$50/hour (\$35 personnel and \$15 fringe) X 100 hours = \$5,000. Contractual is based on 2 Phase I ESAs at \$5,500 each (\$11,000); one Generic QAPP at \$20,000; and 3 Phase II ESAs at \$18,000 each (\$54,000); **TOTAL: \$90,000**

**Task 4 Site-specific Cleanup and Reuse Planning:** City personnel oversight is \$50/hour (\$35 personnel and \$15 fringe) X 100 hours = \$5,000. Contractual is based on 3 SSQAPPs @ \$5,000 each (total \$15,000); 2 HASPs at \$2,000 each (\$4,000); 3 ABCAs at \$6,000 each (total \$18,000); 3 Site Reuse Assessments at \$20,000 each (\$60,000) and 1 Target Area Brownfields Revitalization Plan (\$50,000). **Total: \$152,500.**

**Task 5 Remediation:** City personnel oversight is \$50/hour (\$35 personnel and \$15 fringe) x 100 hours = \$5,000. Contractual is based on 15% of the remedial contractor's fee for plans and specifications preparation, contractor oversight, personal protection air monitoring and air clearance sampling (\$81,750). \$545,000 is based on demolition of the building as recommended by the structural engineer. If actual remediation is less, the additional funds will be used to conduct more assessments. **Total: \$631,750**

**c. Plan to Measure and Evaluate Environmental Progress and Results**

The City of Barbourville, with assistance from CVADD and QEP will track the project progress, expenditures, and outputs and outcomes through excel spreadsheets and quarterly progress reports. Site-specific information will be tracked in the ACRES database. The outputs to be tracked include the number of meetings held, attendees at meetings, educational materials disbursed, environmental assessments performed, site(s) remediated, site reuse assessments and revitalization plans developed, and acres made ready for reuse. The outcomes to be tracked include redevelopment dollars leveraged, jobs created, increased property and sales tax revenue generated, and improved community health metrics. The ACRES property profiles will be updated beyond the life of the grant to fully capture long-term outcomes. Project expenditures and activities will be compared to the projects schedule to ensure the grant will be completed within the five-year time frame. The City expects the project to be completed ahead of schedule. At the close of the project, a final report summarizing project outputs and outcomes will be provided to EPA and Barbourville residents.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

**i. Organization Capacity; ii. Organizational Structure; iii. Description of Key Staff**

The City of Barbourville will be engaged in every task associated with the project. Mayor David Thomson will be responsible to ensure compliance with the terms and conditions of the cooperative agreement. Corey Moren, who has been employed as the City Administrator for 20 years, will be Barbourville's Brownfields Coordinator.

The Cumberland Valley Area Development District (CVADD), a quasi-governmental regional planning counsel, has agreed to provide financial and programmatic grant management as a subrecipient. CVADD has successfully assisted the local communities in its eight-county jurisdiction with grant preparation and administration for more than 50 years. CVADD's staff is proficient in federal grant administration, including EPA Brownfield grants. Ms. Susanna Cornett will serve as the project manager for the Barbourville's MP grant. She has been employed 4.5 years with CVADD, and is the project manager for CVADD's current Brownfields Assessment grant. Ms. Cornett holds a Master of Science degree from the University of Louisville, and has more than 25 years of federal grant administration. If Ms. Cornett becomes unavailable, Executive Director Whitney Chesnut will assume Barbourville's grant administration. Director Chesnut was the project manager of CVADD's previous Brownfields grant. CVADD's previous grant met all requirements including compliance with the work plan, schedule, and terms and conditions. Progress was reported in ACRES. CVADD's finance officer, Arvin Webb, and his staff manage an annual budget of more than \$8 million with no audit findings.

The City of Barbourville, the QEP, and CVADD will work together to ensure all aspects of the grant are implemented in accordance with the cooperative agreement, and quarterly, annual and MBE/WBE reports are submitted in a timely manner.

**iv. Acquiring Additional Resources**

The City of Barbourville has not procured a Qualified Environmental Professional (QEP). The procurement process will comply with 2 CFR 200. A Request for Proposals will be advertised in the local newspaper and on City’s website. Minority and women owned businesses will be encouraged to apply, and notification will be sent through the Kentucky Procurement Technical Center. Firms will be evaluated based on their experience with EPA Brownfields Assessment and Cleanup grants. The City of Barbourville will use the same methods to procure a professional planning firm to prepare a revitalization for the target area.

The Cumberland Valley ADD has verbally agreed to assist Barbourville with financial and project management. Grant preparation and administration for its constituent cities and counties is a core function of CVADD. A formal legal agreement meeting EPA requirements will be executed after grant award. CVADD will be a subrecipient, offering their services to Barbourville for cost reimbursement and not profit.

Additionally, the Kentucky Brownfields Program staff will be consulted and invited to participate during the project term.

The City of Barbourville will promote strong labor practices by ensuring that construction contracts include prevailing scale wages, and advertise any available employment opportunities to the local community.

**b. Past Performance and Accomplishments**

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments

The City of Barbourville has never received an EPA Brownfields grant. However, Barbourville has received and successfully administered other federal assistance agreements. Public meetings were advertised and held at convenient times and locations to encourage community engagement in each project. The table below lists the City’s most recently completed grants.

Funding Agency	Project	Grant Amount	Accomplishments/Outcomes
USDA Rural Development Community Facilities	Police Department Vehicle Purchase	\$50,000	Purchase two new SUVs for use by the Barbourville Police Department.
Land and Water Conservation Fund (funded by NPS)	Thompson Park Splash Pad Expansion	\$27,304	Make improvements to existing splash pad.
Kentucky Infrastructure Authority (funded by EPA)	Barbourville Sewer Rehab	\$2,380,000	Repair or replace 63,335 linear feet of failing gravity sewer lines.

(2) Compliance with Grant Requirements

All grant agreement terms and conditions were met for the above projects, including financial and progress reports. The grant funds were expended within the original period of performance without an extension. Because goals and outputs were met without incident, no corrective measures were necessary or taken. The City is fully compliant with the terms and conditions of these grant programs.

CVADD, which will be assisting with project management, has been awarded two brownfield grants. The first grant was completed on schedule and in full compliance with the workplan and Cooperative Agreement. The active, ongoing grant that is currently complaint.

**City of Barbourville**  
**Brownfield Multipurpose Grant**  
**Threshold Criteria**

**1. Applicant Eligibility**

- a. The City of Barbourville, a unit of local government, affirms it is eligible for funding.
- b. Not applicable

**2. Community Involvement**

Barbourville is in the process of assembling a Brownfields Advisory Committee (BAC) comprised of community stakeholders and residents. The City of Barbourville will follow the EPA's Steps for Effective Public Involvement that include conducting outreach activities, reviewing and incorporating public input, and providing feedback. The City of Barbourville will use their own and partner agencies' websites, social media, radio, local newspapers, and informational brochures to convey project progress, advertise public meetings/webinars and solicit input from target area residents. These methods will accommodate those who have visual or hearing impairments. Partner agencies will share project information with their membership which will reach a broad spectrum of community members. The City will make every effort to provide all residents equal access to the decision-making process. RBC meetings will be accessible via Zoom or similar platform for the convenience of those who are unable to attend in person. The meetings will be held alternately in the three target areas to ease transportation burdens for residents who wish to attend in person. Letters, phone calls and emails will be accepted methods for providing input from residents who do not attend RBC meetings. All questions and concerns will receive a considered response within 10 business days. Workplans and quarterly reports will be available to the public upon request. Meetings will be held in ADA accessible locations. Interpretation services will be provided with advance notice. The City of Barbourville is confident that this plan will be effective in reaching the majority of its residents.

**3. Target Area**

Downtown Business District, defined as a three-block radius around the Knox County Courthouse located at 401 Court Square, Barbourville.

**4. Affirmation of Brownfield Site Ownership**

The City of Barbourville affirms that it owns a site (116 Knox Street) that meets the CERCLA 101(39) definition of a brownfield and is a) not listed or proposed for listing on the National Priority List; b) 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) not subject to the jurisdiction, custody, or control of the U. S. government.

**5. Use of Grant Funds**

Complete at least one Phase II ESA: pages 2, 9, 10 and 11

Remediate at least one site: pages 2, 10 and 11

Develop an overall plan for revitalization of the target area: pages 1, 3, 9, 10 and 11



**6. Expenditure of Existing Grant Funds**

The City of Barbourville affirms that it does not have an open EPA Brownfields Multipurpose Grant or Assessment Grant.

**7. Contractors and Named Subrecipients**

No contractors have been selected. After the EPA cooperative agreement is awarded, contractors will be procured in full compliance with the procurement standards of 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

Cumberland Valley Area Development District (CVADD) has agreed to assist the City of Barbourville with financial and programmatic grant management. As a quasi-governmental regional planning council created by the Kentucky statute, CVADD is eligible for a subaward.