

Mike Pavey, Mayor

765-932-3735

Ann Copley, Clerk-Treasurer

765-932-2672



City of
Rushville
Indiana

November 13, 2023

R05-24-A-010

Ms. Ashley Green
US EPA Region 5
77 West Jackson Boulevard, Mail Code LP-5J
Chicago, IL 60604-3507

RE: Application for a US EPA FY24 Brownfields Community-wide Assessment
Grant – Rushville, Indiana

Dear Ms. Green,



1. Applicant Identification:
City of Rushville
255 South Main Street
Newport, Indiana 47966
2. Funding Requested:
 - a. Community-Wide
 - b. Federal Funds Requested
 - i. \$450,000.00
3. Location:
 - a. Rushville
 - b. Rush County
 - c. Indiana
4. Target Area and Priority Site Information:
 - a. Rushville and surrounding unincorporated areas
 - i. Laker Building – 300 S. McFarland St.
 - ii. Former School – Block of Perkins to Willow Sts. And 6th to 7th Sts.
 - iii. Vacant Commercial Building – 220 N. Morgan St.
5. Contacts:
 - a. Project Director:
Mr. Kyle Gardner
Special Projects Coordinator, City of Rushville
Phone: (765) 561-0806
Email: specialprojects@cityofrushville.in.gov
300 North Main Street, Suite 200
Rushville, IN 46173

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City of
Rushville
Indiana

- b. Highest Ranking Elected Official:
Mr. Mike Pavey
Mayor, City of Rushville
Phone: (765) 932-3735
Email: mayor@cityofrushville.in.gov
300 North Main Street, Suite 200
Rushville, IN 46173

- 6. Population:
 - a. Rushville, Indiana: 6,008

- 7. Other Factors:

| Other Factor | Page # |
|--|--------|
| Community population is 10,000 or less. | |
| Applicant is, or will assist, a federally recognized Indian tribe or United States territory. | |
| The priority sites are impacted by mine-scarred land. | |
| The priority site(s) is adjacent to a body of water | |
| The priority site(s) is in a federally designated flood plain | |
| The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | |
| The reuse of the priority site(s) will incorporate energy-efficient measures. | |
| The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments. | |
| At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area(s). | |
| The target area(s) is located within a community in which a coal-fired power plant has recently closed. | |

- 8. Letter from State
 - a. The letter from the State is attached.

- 9. Releasing Copies of Applications
 - a. NA

Sincerely,

Mayor Mike Pavey
City of Rushville, Indiana

Letter from the State



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • www.idem.IN.gov

Eric J. Holcomb
Governor

Brian C. Rockensuess
Commissioner

November 3, 2023

Mayor Mike Pavey
City of Rushville
300 N. Main Street, Suite 200
Rushville, IN 46173

Re: IDEM Acknowledgement Letter
U.S. E.P.A. Brownfields Grant Proposal
Community-Wide Assessment
City of Rushville
Rush County

Dear Mayor Pavey:

This letter is provided in support of the City of Rushville (Rushville) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community-Wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that Lake Station is requesting \$450,000 for hazardous substances and/or petroleum assessment.

IDEM understands that Rushville has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program (Program) and that Rushville, based on the information it has provided with its request, believes it has the capability to perform the proposed grant-funded activities. The requested assessment grant funding will help Rushville with community outreach, evaluating and prioritizing brownfield site inventory, cleanup planning, and will primarily be used to fund Phase I and Phase II environmental assessments, including asbestos, and lead-based paint surveys.

The grant, if awarded, will address sites in areas of the City with environmental justice issues or those areas identified by the community that are a priority for revitalization and redevelopment. Many of the potential sites are not secure, located amongst residential neighborhoods, falling over, and could potentially have contamination. Rushville will also secure site structures, demo structures collapsing or in disrepair, and conduct public meetings or planning activities to determine best end use on a site-by-site basis.

Since Rushville has not yet selected/indicated the specific sites that will benefit from U.S. EPA brownfield grant funding, IDEM cannot make site-specific eligibility determinations at this time. However, should Rushville be awarded the requested grant funding, the Program will work together with U.S. EPA and Rushville to determine site eligibility once Rushville has established the sites intended for funding.

IDEM has worked with the City of Rushville on several projects. IDEM recognizes that Rushville is committed to working with the Program and/or the IDEM Voluntary Remediation Program for technical oversight of grant-funded site activities as applicable during the grant project period. The Program and IDEM are committed to continuing to support brownfield redevelopment within Rushville by providing technical and other assistance through the Program.

Based on the information submitted, IDEM considers the City of Rushville an excellent candidate to receive U.S. EPA assessment grant funding to continue its brownfields redevelopment efforts, which support Indiana's brownfields initiative. IDEM looks forward to continuing its partnership with Rushville and its constituent communities. For further assistance, please contact John Morris of the Indiana Brownfields Program directly at (317) 234-0235 and at jmorris@ifa.in.gov.

Sincerely,



Andrea Robertson Habeck
Technical Staff Coordinator
Indiana Brownfields Program

cc: *(via electronic transmission)*
Julie Schilling, V3 Companies
Kyle Gardner, Special Projects Coordinator, City of Rushville
John Morris, Indiana Brownfields Program

Narrative

1. Project Area Description and Plans for Revitalization; 1.a. Target Area and Brownfields; i. Overview of Brownfield Challenges and Description of Target Area: In the heart of Rush County, Rushville shines as a beacon of rural economic prowess and community spirit. Located southeast of Indianapolis at the intersection of State Roads 3 and 44, and US Highway 52, we are located along the banks of the Flatrock River and surrounded by expanses of agricultural land. Rushville was founded in 1838 and graced by the legacy of Dr. Benjamin Rush, a signatory of the Declaration of Independence. Our city stands at a pivotal crossroads—not just the literal intersection of major thoroughfares but also at the cusp of a transformative era. Rushville's commitment to growth and revitalization has not gone unnoticed, we are one of only 17 communities in Indiana earning the Stellar Community Designation from the Indiana Office of Community and Rural Affairs in 2016, a testament to our unwavering dedication to enhancing the quality of life for our citizens.

Despite our storied success, the shadow of industrial decline looms over us. With the development of rail in Southeastern Indiana, Rushville's prime location as a mid-point between Indianapolis and Cincinnati caused a major industrial boom during the turn of the century through the 1960s. Once crossed by the Interurban Rail Line along with three other major rail lines, the city was a natural home for lumber yards and food processing plants. Rushville once had the highest concentration of manufacturing jobs in the state, including operations such as auto parts, furniture, glass jars, and farm equipment manufacturing. Foreign competition and the Great Recession hit these manufacturers hard, resulting in the citizens of Rushville facing significant job loss and economic hardship. Our proud industrial past, which once fueled this manufacturing zenith, has bequeathed a legacy of brownfield sites—a stark reminder of a bygone era of prosperity. These sites, while marking the struggles of our past, now stand as untapped canvases for redevelopment and revitalization.

Encompassing all of Rushville and extending into our Strategic Growth Zone—an area ripe with potential for population and economic expansion—we have identified over 30 brownfields as opportunities for rebirth. The Strategic Growth Zone consists of a 2-mile radius extending beyond the city limits. In collaboration with County officials, a synergy of purpose and planning has emerged, aiming to thoughtfully integrate these areas into the fabric of our city through strategic land use. These are not mere plots of land; they are the keys to our future.

The task before us is monumental, but not insurmountable. We seek to reclaim these spaces, to transform them from symbols of decay into cornerstones of community and prosperity. Through this Brownfield Assessment Grant, we will not only preserve the character of Rushville, but also catapult it into a future where history and progress coalesce, where every resident is a stakeholder in our collective success. This grant is more than funding—it's a catalyst for Rushville's renaissance.

ii. Description of the Priority Brownfield Sites: Since our last brownfields assessment grant (FY15), we have continued to build upon our brownfields inventory, and the current list contains more than 30 sites still in need of funding. Of this extensive list, we chose to highlight the following three sites based on community input, their inclusion in our recent Comprehensive Plan Update as sites within planned developments, and their high potential to negatively impact the environment and the health and welfare of nearby residents.

Laker Building, 300 South McFarland Street – This 2.6-acre property located in a FEMA Flood Plain (Zone AE) consists of a dilapidated two-story 20,000 ft² building near the entrance to Rushville along State Road 44. The structure on this site is not structurally sound and poses a major safety risk due to its current state of disrepair and its location adjacent to the proposed Rails to Trails walk/bike path. The property is adjacent to a former rail line (future trail), Flatrock River, and Riverside Park and is within the proposed City Department Campus. This city-owned property was most recently used for equipment storage by the city and formerly operated as Laker Farm Implements, a farm equipment supply and service company.

Former School, City Block of Perkins to Willow Street and 6th to 7th Streets – This 2-acre site is a vacant city block directly adjacent to at least 20 residential homes. A former school was originally housed in this location, and when the school was demolished in the late 1990s, the demolition debris were simply buried in the school's basement. Some of the buried construction debris are known to be asbestos containing materials (ACMs); however, the extent is unknown and undefined.

Vacant Commercial Building, 200 N. Morgan Street – This 0.19-acre site consists of an 8,200 ft² vacant commercial building constructed in 1927. Past uses include a thrift shop, various retail, and a Mullis Drycleaner from at least 1986 until the late 1990s. The structure is in severe disrepair and poses a safety concern to residents, especially children, due to its proximity to high traffic areas such as the farmers market, trail, library, and church. The site is located with a FEMA flood plain (Zone X), a TIF District, and is bounded by the First Presbyterian Church and the Public Library to the north, commercial and residential structures to the south and west, and the Rushville Farmer’s Market, Wilkie Park, and downtown commercial buildings to the east. The Farmer’s Market/Riverside Trail, which runs from Riverside Park to the south, bounds the site to the west and north.

Known or potential contaminants of concern at these sites include: asbestos containing materials (ACM), lead based paint (LBP), various metals, polychlorinated biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs), especially chlorinated solvents. **Health effects of potential / known COCs:** Respiratory damage; asthma; damage to bone marrow, liver, kidneys and central nervous system; anemia; leukemia; lung and bladder cancers¹. **Proximity to sensitive populations:** These sites are located within high density residential areas where children comprise 21% of the population, over 19% are elderly (over 62), and 22% are disabled (with 70% of those being under the age of 65).²

ii. Identifying Additional Sites: If grant funding remains after assessing eligible sites in our inventory, we will commit funding to request community and stakeholder input via social media outlets and public meetings to expand upon our current brownfield inventory and continue the prioritization process. Prioritization is based on the following criteria: imminent threat to human health or the environment, proximity to disadvantaged citizens, development goals and developer interest, property owner interest / site access attainability, and job creation. This grading metric is used to create a database to be overlain into our current Geographic Information System (GIS) and color coded by priority level (high, medium, low) to quickly identify sites.

1.b. Revitalization of the Target Area; i. Reuse Strategy and Alignment with Revitalization Plans: Rushville’s 2021 Comprehensive Plan Update outlines the importance of community investment and character. We have had many recent successful community investments leading to transformative changes within Rushville. The importance of investing beyond tangible infrastructure projects has been an important factor in the City’s success, and we seek investments that go beyond traditional activities to include factors that provide noticeable improvement in the health and welfare of the entire community. During the 2021 Plan update, the following revitalization goals highlighted by our community align directly with our priority sites reuse strategies: 1) continue placemaking efforts to draw residents and tourism to downtown destinations; 2) continue strategic reinvestment in existing neighborhoods to strengthen community pride; 3) add new quality of life amenities that are connected through a multi-use trail system; 4) recruit and involve residents and community organizations into active leadership roles in planning efforts; 5) redevelop empty or underutilized properties in all areas of the city; and 6) improve the appearance of our rundown and dilapidated city gateways.

Laker Building, 300 South McFarland Street – This site is located within our proposed City Department Campus, designed to consolidate city departments into a single campus that will allow for better coordination and resource sharing. The current structure on this site is irreparable; therefore, the city’s plan proposes to replace this structure with a new, more efficient building for storage. The northern portion of the site is planned to house the new Parks and Street Department Office building and the new Rails to Trails Trailhead, which will traverse the western property boundary to State Road 3 to the south, through downtown to the Rush County Fairgrounds, Memorial Park, and school campus to the north, and through Riverside Park connecting to three additional trail systems to the east. This project aligns directly with the above goals 3, 5, and 6.

Former School, Block of Perkins to Willow Street and 6th to 7th Street – The city would like to use EPA grant funding to complete site planning including community charrettes involving surrounding residents to gather

¹ ATSDR, CDC, 2023

² US Census Bureau, American Community Survey (2021 5-year estimates)

input, ideas, and needs. The city sees a strong potential of repurposing this site as a community park or adding quality, affordable housing. This project aligns directly with the above goals 2, 4, and 5.

Vacant Commercial Building, 200 N. Morgan Street – The recently completed Farmer’s Market has been a huge success in our community and serves as a community gathering spot and venue for various events. The city hopes to transform this property into an extension of the adjacent Farmer’s Market and create an innovative space for small local businesses to thrive. We envision the construction of chalets that can serve as small business incubators or pop-ups, offering aspiring local entrepreneurs a unique opportunity to test the market before committing to a traditional, and costly, brick and mortar store. This project aligns directly with the above goals 1, 2, 3, and 5.

ii. Outcomes and Benefits of Reuse Strategy: Obtaining grant funding will allow the continued assessment of brownfields in the city, identify risks and potential contaminant exposure pathways, and take steps to remediation or mitigate risks utilizing greener remediation methodologies. In addition, environmental assessments and site planning will help facilitate cleanup and reuse that would be otherwise hindered and not materialize without this EPA funding. Demolishing or renovating deteriorating structures will eliminate health and safety hazards for residents and lead to development. During all phases of the revitalization process, it is important to the city and the community that new and renovated structures implement a whole-building energy efficiency approach and utilize strategies and features such as: energy efficient windows, roofs, and HVAC systems, continuous insulation, smart or LED lighting, energy star appliances, etc. Using these strategies will replace old buildings that are beyond their useful lifespan with green buildings that will not drain our local utilities and provide utility cost savings to our impoverished residents.

The reuse strategies for our priority sites, all located in high-density development and downtown areas, will benefit the community by lowering initial infrastructure investments, minimizing environmental footprints, and reducing sprawl and impact to surrounding agricultural land. Additionally, the strategy for our Vacant Commercial Building site benefits our community by creating jobs, adding local entrepreneurial opportunities, increasing the tax base, and increasing tourism.

The proposed assessment and redevelopment of our priority brownfields sites will remove environmental and safety threats, reduce blight, improve the appearance of community gateways, add recreational space, and promote the city as being a unique, safe, and walkable community. This in turn will be linked to successful reuse outcomes, improving the economic competitiveness of our city, leveraging current and future investment, stimulating private sector investments, and improving our resident’s quality of life and economic future.

These projects will improve local climate adaptation resilience by creating new greenspace, reducing carbon emissions, enhancing our trail network, encouraging green transportation, turning idled brownfields into new hubs for local economy growth, and creating energy efficient and sustainable development. With Rush County being a predominantly rural area with a focus on agriculture, we have planned to incorporate rain gardens, bioswales, urban forests and gardens into our parks plan. Not only will this improve our climate adaptation resilience, but also designed to provide learning opportunities for our Future Farmers of America students.

1.c. Strategy for Leveraging Resources; i. Resources Needed for Site Reuse: Securing our FY15 Brownfield CWAG gave us the resources and confidence that we needed to take control of our city’s future and we charged headfirst to create a revitalization strategy centered on brownfield redevelopment and improving our quality of place. These innovative redevelopment approaches and accomplishments that were born from that EPA grant were recognized by OCRA when we were designated the 2016 Indiana OCRA Stellar Community. This prompted our slogan change to “Leading the Way in Rural Indiana,” and it really has become a way of life in our community. Since the adoption of our new motto, we have partnered with communities across the state to assist in lending our experience and, in doing so, learning from theirs.

“From being a Stellar Community Designee in 2016 to a current mentor community in OCRA’s Peer Program, Rushville continues to focus on excellence in their community. I have long said that rural Indiana is the next economic frontier, and leaders like Mayor Mike Pavey are ensuring that is the case, not just in Rushville, but throughout the entire state.”

- Lieutenant Governor Suzanne Crouch

New projects aimed at quality of place, infrastructure improvements, workforce development, and new development have begun to pay dividends for the community in the form of increased outside investment and additional visibility for business prospects. Rushville has a proven track record of leveraging private and public funding, leveraging over \$117 million in local investment since 2017. We believe that the EPA brownfield grant spearheaded these project successes, and without it, this investment would not have materialized. After wrapping up larger undertakings the city needed to address since the closeout of the previous EPA grant, our city now stands poised to re-engage with the ongoing challenge of brownfield sites. Looking ahead with this goal in mind, we crafted a robust strategy for brownfield rejuvenation. This strategy, bolstered by support of this EPA funding, is poised to secure the necessary means to fulfill our ambitious vision and goals.

Funds collected from our TIF Districts will be strategically allocated to address challenges facing our residents due to brownfield sites. We currently have three TIF Districts: the industrial park district; the first housing TIF district in the state; and a downtown TIF district. Our three priority sites all lie within one of these districts, and funding can be used for infrastructure development, façade improvements, environmental remediation, business attraction, community education, and quality of place projects.

Also, funding from IBP allowed us to conduct remediation activities at some of our past brownfield sites. During that process, we developed a strong relationship with IBP and are confident that funding for clean-up will be provided by IBP for any sites assessed as part of this grant. We are also highly adept at utilizing resources including: insurance cost recovery, OCRA funding, USDA funding, INDOT funding, IBP funding including the Phase 1 Site Assessment Initiative, Revolving Loan Fund, the POSI program, Section 128(a) site-specific EPA funding, and EPA-funded Targeted Brownfields Assessment (TBA). The use of EPA brownfield grant funding has the potential to trigger other funding sources. For instance, if brownfield funding is used to assess a property and orphan underground storage tanks (USTs) are discovered, the city can use IBP POSI funding to close the USTs by removal and remediate soil and groundwater as applicable. This type of activity would ultimately lead to the issuance of a Comfort Letter from IBP, creating a shovel-ready site for redevelopment.

ii. Use of Existing Infrastructure: Our priority sites are located in developed areas with established infrastructure like water/sewer, communications, electric, natural gas, and street access. These sites are also located on major corridors, and on or near state and US highways.

2. Community Need and Community Engagement; 2.a. Community Need; i. The Community's Need for Funding: Historically, Rushville was a bustling hub, driven by its robust manufacturing sector. However, the impact of the Great Recession coupled with global competition led many of these enterprises to seek more cost-effective alternatives elsewhere. The resulting void left us grappling with neglected, polluted brownfield sites, a surge in unemployment, and a weakened economy. This, in turn, deterred potential investors, further stymieing economic rejuvenation. With a modest population of 6,008², a constrained city budget, and any surplus being channeled to other critical initiatives, addressing these brownfield areas has been daunting, especially with the pressing need for vital infrastructure and utility repairs.

Recent years have seen our funds being spread thin due to essential infrastructure enhancements, employment generation, and quality of life initiatives. Mandated by the IDEM, Rushville had to invest considerably in rectifying its longstanding sewage overflow issue, culminating in a spend of over \$8M on upgrades and an additional \$9M on utility and road enhancements. Furthermore, the acquisition of \$5.4M in READI Grant funds is earmarked for two pivotal projects. Notably, Diamond Pet Foods' upcoming manufacturing and distribution hub, which will usher in over 170 job opportunities by 2024, has a whopping project outlay of \$223M, with the city pooling in significant grant and municipal funds. Concurrently, the new Community Center, backed by over \$9M from the city for its \$23M budget, is in its construction phase. While these endeavors anchor our hope for a brighter economic horizon, they have exerted immense pressure on our finances, underscoring the need for grant support for our brownfield initiatives.

Moreover, economic challenges are palpable at the household level. The median income for Rushville households stands at \$54,122, noticeably lower than nearby counties and the state average of \$66,785². Our per capita income

is a modest \$27,287, trailing Indiana's \$32,537². In 2021, the child poverty rate was 16.7%, slightly above Indiana's 15.7%³. By 2023, a significant 57% of students in the Rushville School District were beneficiaries of free or subsidized lunches, compared to the state's 47%³.

We are witnessing a rapid decline in our working-age demographic, leading to an increasingly elderly populace, and further dwindling our already modest tax inflow. In stark contrast to Indiana's population growth of 4.2% from 2010-2020, Rush County saw a decline of 5.9%³. Our unemployment rate at 10.2% is over two times that of Indiana's 4.7%². Without proactively addressing quality of life issues and the burgeoning brownfield challenge, we risk alienating younger generations, which are crucial for our community's future vibrancy.

ii. Threats to Sensitive Populations; (1) Health or Welfare of Sensitive Populations: Our target brownfield sites are near residential and downtown areas that have a high concentration of sensitive populations such as low-income residents, children, the elderly, and the disabled. The median household income in Rushville is 23% below the state average, and our unemployment rate is 117% higher than that of Indiana. Only 21% of our population possesses a college degree, in contrast to Indiana's 32%. Over half of Rushville residents have not completed high school. Moreover, 22% of our city's inhabitants are disabled, surpassing both state (14%) and national (12.5%) figures².

Housing quality is a pressing concern in Rushville; over 80% of homes here predate 1970, raising potential risks of asbestos and lead-based paint exposure. Renter occupied households comprise 44% of the occupied housing, an increase of 23% since 2012. And 14% of our homes are vacant. Given the proximity of these homes to potential brownfield contaminants such as metals, petroleum, VOCs, lead paint, and asbestos, it's clear why our median home value (\$86,800) is substantially less than that of the nearest neighboring comparable city, Batesville (\$164,500). Living close to these brownfield sites not only exposes the residents to harmful contaminants, but also to unsecure and unsafe properties.²

The presence of numerous brownfields adjacent to economically challenged areas further depresses property values, deterring business investments and quality employment opportunities, thereby amplifying the hardships faced by our vulnerable residents. This grant's financial support is crucial for initiating site assessments, leading to the eventual cleanup and transformation of these degraded areas into valuable housing, recreational spaces, and business ventures, and integrating them with our expanding trail networks.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: Several health issues linked

| Incidence / Death rates Per 100k unless otherwise noted | Rush County | IN |
|--|----------------|---------|
| Breast Cancer Incidence ¹ | 146 | 121 |
| Lung Cancer Incidence ¹ | 79 | 71 |
| All Cancer ¹ | 522/212 | 467/162 |
| Cardiovascular Disease ² | 487/256 | 462/239 |
| Chronic Lower Respiratory Deaths ² | 86 | 54 |
| Child Asthma ER Visit Rate ¹ per 10,000 | 55 | 34 |
| Premature Deaths (Aged 75 and under) ¹ | 428 | 420 |

¹ Indiana INdicators CDC Data (2023 data); ² CDC Interactive Atlas of Heart Disease and Stroke (2016-18 data).

to exposure to the potential contaminants in our brownfield sites are compounded by our city's substandard housing and the prevalence of former industrial facilities, highways, contaminated waterways, and lack of resources to tackle these issues. As shown in the table, our County's high cancer incidence rates, especially lung and breast, can be directly linked to common contaminants such as VOCs, PAHs, metals, and asbestos, all potentially found in our nearby brownfield sites. Over 22% of the population is disabled, 10% of which have cognitive disabilities² which

are directly correlated to exposure to PCBs, lead, and mercury – common contaminants at brownfield sites. Respiratory and cardiovascular diseases can be attributed to some of these contaminants and are exacerbated by a lack of affordable and easily accessible exercise options. Assessing and cleaning up our priority brownfields will facilitate the identification and reduction of hazardous substances that contribute to these health conditions and allow for needed recreation spaces to provide free local exercise opportunities.

(3) Environmental Justice; (a) Identification of Environmental Justice Issues:

Per the CEJST data, the census tract located in the southwest portion of our city is identified as a disadvantaged census tract, evidenced by three specific burden markers coupled with low-income residents. This area ranks in the 95th percentile for lack of green space, 92nd percentile for lack of indoor plumbing, and 94th percentile for

transportation barriers. This tract and all other Rushville census tracts scored near or over the 80th percentile in the CEJST’s low life expectancy, diabetes, heart disease, asthma, lead paint, underground storage tanks and releases, poverty, unemployment, energy costs, and population loss categories. This shows that environmental justice issues are ubiquitous in Rushville, not just an issue for one side of town.

The EPA EJ Screen Tool reveals that residents near our priority sites fall into the low income (73rd percentile) and elderly (88th percentile) categories who experience a high exposure to particulate matter (63rd percentile), ozone (61st percentile), toxic releases to air (59th percentile), and lead-based paint (87th percentile). These sensitive populations are notably more susceptible to harmful effects due to the brownfield-related contaminants in their communities, reflected by their low life expectancy (94th percentile). Direct contamination exposure can also occur via river pollution and floodwaters, contaminated soil and groundwater, unsafe buildings, and airborne threats (i.e., ACM). Rushville is listed by the IDEM as one of only 14 Indiana counties with over 50 Confined Feeding Operations (CFOs) and Concentrated Animal Feeding Operations (CAFOs). The CDC reports these facilities are a source of nitrogen and phosphorus, *E. coli*, growth hormones, antibiotics, animal blood, and leachate from corn feed. According to the 2020 Indiana 303(d) List of Impaired Waters, the Flatrock River and its nearby tributaries are on the list for contamination of *E. coli*, mercury and PCBs in fish tissue, biological integrity, and nutrients. The EJ Screen lists our target area in the 84th percentile for flood risk. While some of these specific hazards are out of our control, assessing environmental risks at brownfield sites leads to a reduction in the overall threats to our residents’ health and promotes local enterprise growth.

(b) Advancing Environmental Justice: The cornerstone of utilizing grant-driven activities to champion and sustain environmental justice lies in community engagement and equitable development tactics. Prioritizing the input of our marginalized and vulnerable residents in all phases – from site selection to redevelopment – remains crucial to the city and will be implemented using the strategies discussed in Section 1.b. By integrating community feedback, we aim to address the outlined challenges and those that resonate deeply with our citizens. Through collaboration, our objective is to cultivate a more conducive environment for living, working, and raising families. For instance, the creation of additional trails and greenspace is a chief concern for many of these residents, and the transformation of the Laker Building to a trailhead will promote health, increase property values and quality of life and place, and boost community pride in a disadvantaged area. Redevelopment plans of the Former Commercial Building as a community-driven entrepreneurial space will create quality jobs, support local entrepreneurs, support and encourage disadvantaged businesses, and boost community pride and quality of place. The Former School property, depending on community input, is planned as an additional greenspace area adjacent to our sensitive populations or developed with quality, affordable housing. The redevelopment of just these three sites will improve our disadvantaged areas overall air quality, reduce pollution exposure, advance access to housing, promote public facilities, and increase physical activity. Through grant assistance and ongoing community participation, we can bolster these ventures, ensuring they yield immediate and tangible benefits for our populace. Our city’s close-knit rural setting and the brownfield team’s deep-rooted ties to the community uniquely position us to grasp our residents’ needs, essential for cultivating social fairness.

2.b. Community Engagement; i. Project Involvement; ii. Project Roles: The city’s partners identified below understand the value of EPA grants and will support this effort by providing continual community outreach and engagement. We will continue this local outreach to grow our established grassroots community network.

| Partner Name | Point of Contact | Specific Role in the Project |
|---|--|--|
| Rush County Economic and Community Development Corp. (ECDC) | John McCane, 765.938.3735 johnmccane@rushedc.org | Assist with identification and prioritizing brownfield sites; provide input on reuse planning; identify areas suited for industry and development; provide incentives for developers |
| Heart of Rushville, Main Street Program | Mary Ann Bridges, 765.938.4648 heartofrushvillein@gmail.com | Assist with identification and prioritizing brownfield sites; provide input on reuse planning, especially to the Morgan St. site; community engagement / liaison |
| Rush County Health Department | Dr. Russell Daugherty, 765.932.3103 rcdh@rushcounty.in.gov | Community outreach; emergency response; health monitoring of residents affected by contamination |
| Rush County Community Foundation | Chris May, 765.938.1177 cmay@rushcountyfoundation.org | Provide meeting space in downtown Rushville; assist local entrepreneurs with grant funding; assist with site identification |

iii. Incorporating Community Input: At the heart of Rushville’s revitalization strategy lies a steadfast commitment to dynamic and inclusive community engagement. Rooted in our rich tradition of collaboration, as showcased by the remarkable turnout for our 2021 Comprehensive Plan Update, we pledge to galvanize this spirit through the lifeblood of the EPA brownfield grant program. Our proactive engagement framework promises a series of 8-12 strategic public assemblies over the 4-year grant duration. These gatherings are not mere meetings but beacons of active civic participation and innovation, designed to spark sustained enthusiasm, crystallize insights on site selection and cleanup strategies, and co-create a visionary blueprint for land reuse. Recognizing the diverse tapestry of our community, we will deploy a multi-channel outreach campaign. From prominent announcements in our local newspaper, the *Greensburg Daily News*, to targeted digital bursts on city platforms and hands-on distribution through essential community conduits like local food banks and the Booker T. Washington Community Center, our aim is to leave no voice unheard, specifically targeting our sensitive populations. Mobility or distance will not be barriers; we will ensure every session is accessible, with ADA-compliant venues spread across the city’s quadrants—from the emerging Community Center to the heart of civic life at City Hall. Translators, sign language interpreters, and translated documents are available upon request to assist non-English speaking or hearing-impaired residents.

Rushville is at the vanguard of adaptive engagement. Whether navigating social distancing or unforeseen circumstances, we are equipped with a suite of virtual and traditional tools to maintain uninterrupted dialogue, aligning with EPA’s OLEM guidance, *Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants*. We will leverage this adaptability to customize outreach, ensuring that every segment of our population is reached in the most resonant manner. Our completed Stellar projects are not just cultural highlights, but testaments to the power of community-led initiatives. This is evidence of our collective capability to rally the community towards common goals. We plan to channel this same vigor and commitment into the brownfield grant program, ensuring a legacy of engagement that not only meets but even exceeds the expectations of our citizens.

As we embark on this journey of transformation, our approach is not just to consult but to co-create with our community. From the inception of cleanup and reuse plans to the reflection on our journey at the program’s culmination, every step will be marked by transparent communication and collaborative decision-making. We will celebrate our triumphs, learn from our challenges, and together, sculpt a future where Rushville stands as a paragon of community-driven progress. Rushville is more than a locality—it is a living canvas where every resident’s voice adds color and depth to our collective future. With this grant, we are not just cleaning up lands; we are cultivating fertile grounds for our community’s dreams and aspirations to flourish.

3. Task Descriptions, Cost Estimates, and Measuring Progress; a. Description of Tasks/Activities and Outputs:

The city and their partners will determine methods and solutions for major components of the plan and process, evaluate how best to solicit and incorporate community input, and identify critical implementation strategies. This timeline assumes a finalized Cooperative Agreement by October 2024. Grant tasks will be completed as follows:

Task 1 – Programmatic Activities i. Project Implementation: The County has already retained the services of a Qualified Environmental Contractor (QEC) for grant proposal writing and grant services through a dual procurement competitive bidding process, compliant with federal procurement regulations 2 CFR 200.317-200.326. Further details of the solicitation and procurement process are provided as an attachment. Partners listed in **Section 2.b.** have committed assistance and in-kind services for this grant. The QEC and Rushville will perform programmatic activities including managing the project team activities, preparing quarterly reports, annual financial and disadvantaged business enterprise reporting, and all other reporting requirements with EPA (such as ACRES reporting). These reports will highlight the status of completion for tasks, progress made over the reporting period, challenges with project implementation, financial expenditures, preliminary data and findings, anticipated activities in the upcoming reporting period, and any changes in key staff involved.

ii. Anticipated Project Schedule: Attend national/regional brownfield conference(s) – 2025-26; monthly team meetings between QEC and the city; quarterly reports submitted the 30th of each April, July, October, and January (beginning Jan. 2025); financial and DBE reporting submitted annually; updates to ACRES after project milestones and/or quarterly.

iii. Task/Activity Leads: The city and QEC

iv. Output(s): City staff to attend brownfields conference(s); meeting minutes and project performance reviews/reports; quarterly reports submitted via ACRES and financial and DBE reports submitted via email; calls, meetings, and correspondence between team (City, QEC, EPA, and Partners) for grant management.

Task 2 – Community Outreach and Inventory Prioritization, i. Project Implementation: The city will hold at least eight public meetings (one kickoff within the first 6 months of grant period) to educate the community and officials about the brownfield initiative and solicit input regarding sites. Meetings, whether virtual or in-person, will be held to educate brownfield property owners and to secure access agreements. We will request community and stakeholder input to expand upon our current inventory and continue the prioritization process. Prioritization is based on the following criteria: imminent threat to human health or the environment, proximity to sensitive populations, development goals / developer interest, property owner interest / site access attainability, and job creation. This grading metric is used to create a database to be overlain into our current Geographic Information System (GIS) and color coded by priority level (high, medium, low) to quickly identify sites.

ii. Anticipated Project Schedule: Identify additional community partners and stakeholders by Jan. 2025; first public meeting in Quarter 1 and subsequent meetings at least every 6 months thereafter; prioritize inventory (score sites) by Dec. 2024 and review quarterly.

iii. Task/activity Leads: The city, QEC, and Partners

iv. Output(s): Identification of additional partners; meeting minutes; additional sites based on community input; GIS maps / Excel databases of prioritized brownfield sites; informational sheets and maps for public distribution.

Task 3 – Phase I/II Environmental Site Assessments (ESAs)/QAPP, i. Project Implementation: Once sites are selected and site access is granted, eligibility determinations will be submitted to the EPA Project Officer for approval. After approval, the QEC will conduct Phase I ESAs for the selected sites under ASTM Standard 1527-21 and the EPAs “All Appropriate Inquiry” rule. The city, EPA, and QEC will schedule a data management call to discuss quality assurance during the first quarter. The QEC will then prepare a QAPP, which will be reviewed and approved by the EPA before Phase II work can begin. Prior to each Phase II ESA, the city and the QEC will submit a site-specific Sampling and Analysis Plan (SAP) and Health and Safety Plan (HASP) to the EPA Project Officer for approval. Our grant funds focus is on site assessments, and at least 15 sites will be assessed as part of this grant; however, we would like to exceed this goal and assess 20 properties.

ii. Anticipated Project Schedule: The QAPP submittal in Nov. 2023 and updated annually; Phase I ESAs begin upon finalization of Cooperative Agreement and continue as each new site is selected and obtains eligibility approval; Site-specific SAPs and HASPs submittal after Phase I ESA completion (estimated to begin Dec. 2023); Phase II ESAs commence after Phase I completion and SAP/HASP approval; all activities completed by end of Quarter 11 and final contractor invoices submitted at least 45-days to end of grant period.

iii. Task/activity Leads: QEC and the city

iv. Output(s): 15-20 Phase I ESAs; QAPP; 6-10 SAPs/HASPs and Phase II Investigations

Task 4 – Cleanup and Reuse Planning, i. Project Implementation: If sites require planning activities outside of the QEC capabilities, the city and its partners will select a qualified engineering/planning firm following Federal procurement regulations. The QEC/Eng. Firm will conduct cleanup/reuse planning after evaluation of Phase II data for each site based on potential reuse scenario(s) and public input. Each Analysis of Brownfields Cleanup Alternatives (ABCA) / Remedial Action Plan (RAP) will include remedial actions for identified contaminants that exceed IDEM regulatory screening levels. Remedial actions are evaluated on cost, intended use, feasibility, and effectiveness in protecting human health and the environment. Up to 2 public meetings will be held for each site to inform and solicit feedback from the community; the services of the Health Department will be sought, if needed. Reuse planning will dovetail our revitalization strategy and include such outputs as infrastructure evaluations, site reuse assessments, and market analyses.

ii. Anticipated Project Schedule: Cleanup planning for sites commence when contamination is confirmed (est. Fall 2025) and public/stakeholder meetings will be scheduled at the onset and completion of these activities; planning studies completed as needed for site redevelopment and occur after the completion of the site RAP.

iii. *Task/activity Leads:* QEC, Engineering/Planning Firm, and the city

iv. *Output(s):* Remediation Work Plans / ABCAs; planning documents (site specific as warranted)

3.b. Cost Estimates:

| Program Task | Task 1 Programmatic Activities | Task 2 Outreach & Prioritization | Task 3 Phase I / Phase II | Task 4 Cleanup / Reuse Planning | Budget |
|---------------------|--------------------------------|----------------------------------|---------------------------|---------------------------------|------------------|
| Personnel | \$2,000 | \$4,000 | \$2,000 | \$3,000 | \$11,000 |
| Travel | \$3,000 | | | | \$3,000 |
| Supplies | | | | | \$0 |
| Contractual | \$15,000 | \$20,000 | \$221,000 | \$180,000 | \$436,000 |
| Total Budget | \$20,000 | \$24,000 | \$223,000 | \$183,000 | \$450,000 |

Task 1: Programmatic Activities: The \$20,000 budget includes \$15,000 for the QEC (150 hours x \$100/hr) and \$2,000 for the city (40 hours x \$50/hr). City staff will attend at least one national and/or one regional EPA Brownfield Conference for a total of \$3,000. This assumes \$1,500 for registration and fees, a \$500 airplane ticket for the national conference (location TBD) and \$200/night for hotel for 5 days (both conferences combined).

Task 2: Outreach and Inventory Prioritization: The \$24,000 budget includes \$20,000 for the QEC (200 hours at \$100/hr) and \$4,000 for city personnel (80 hours x \$50/hr). The city and their partners listed in *Section 2.b.ii.* will provide meeting space and supplies as in-kind services for grant associated meetings.

Task 3: Phase I/II Environmental Site Assessments (ESAs)/QAPP: The \$223,000 budget includes: 11 Phase I ESAs (15 x \$3,600 average = \$54,000); QAPP (\$7,000 total), 8 Phase II ESAs: (8 x \$20,000 each = \$160,000). Our experience is that individual projects require several meetings with stakeholders or State agencies for Phase I and Phase II ESAs. We anticipate \$2,000 for city personnel time at meetings (40 hours at \$50/hr). These costs are averages only and may vary based on site conditions and complexity.

Task 4: Cleanup and Reuse Planning: The \$183,000 budget includes: 3 ABCAs/Cleanup Plans (3 x \$10,000 = \$30,000), 3 site reuse plans (3 x \$50,000 = \$150,000), and \$3,000 for city personnel (60 hours at \$50/hr).

Any city personnel time invested in this effort above the amounts listed above will be provided as in-kind services throughout the duration of this grant timeline.

3.c. Plan to Measure and Evaluate Environmental Progress and Results: The program manager for the grant will perform monthly grant reviews ensuring sufficient progress is being made and key outputs are on schedule and on track for completion. Corrective actions will be taken immediately to minimize delays, and the program manager will meet quarterly with the team to evaluate and make necessary adjustments to the project. While the number of completed Phase II ESAs and ABCAs/RAPs will also be used as measures of success, their number and cost to complete will be dependent on the outcome of Phase I ESAs. A site-specific “property profile” will be completed in the ACRES database for each parcel that benefits from the use of EPA funds, and a quarterly progress report summarizing project activities will be submitted to the EPA Region 5 Project Officer (via ACRES) within 30 days of the previous reporting period. The city will ensure that the following measures of success are tracked and documented in quarterly reports / ACRES submittals: brownfields assessments started; brownfields assessments completed with expended amounts; properties with brownfields redevelopment activities underway; climate adaption and mitigation strategies incorporated; cleanup & redevelopment dollars leveraged; jobs leveraged; properties with brownfields cleanup activities started; properties with brownfields cleanup activities completed; and those without cleanup.

Quarterly progress reports will include: modifications to the Work Plan; project activities relative to the EPA grant; task progress/schedule; site identification and targeted sites; cleanup redevelopment activity; summary of expenses by category; and other financial assistance leveraged. Electronic copies of all Phase I, Phase II, reuse planning, and ABCA reports completed during the quarter will be forwarded to the EPA Project Officer via ACRES and/or email within a week of completion. All material will also be forwarded to the IDEM and the IBP.

4. Programmatic Capability and Past Performance; a. Programmatic Capability; i. Organizational Capacity, ii. Organization Structure, iii. Description of Key Staff: The city has a brownfields team in place that will

manage this grant and is actively creating opportunities for development within the city. They have previously managed a FY15 EPA brownfields grant as well as managing private, public, and grant funding for 92 projects totaling over \$116M in the last 3 years. **Mayor Mike Pavey**, Rushville Mayor, will serve as the Project Director. Mayor Pavey has a background in economic development and engineering and has served Rushville in various civic leadership roles from 1994 until his election as Mayor in 2011. Mayor Pavey's goal has remained unchanged – he seeks to improve the quality-of-life for his fellow hometown residents. Mayor Pavey will be assisted by **Mr. Kyle Gardner**, Director of Special Projects. Kyle is a long-time resident of Rushville, has served as a county councilman, and has had numerous roles within the financial industry prior to his current full-time role with the city. Mr. Gardner will serve as Project Manager and will oversee grant administration, public outreach efforts, project development, and reporting. **Ms. Ann Copley**, Clerk-Treasurer, will serve as the Project Administer. Ms. Copley has been in her position since 1998, assuring the city's competitiveness in applying for grants, managing and investing the city's funds, and providing annual financial reports to the Indiana State Board of Accounts. Ms. Copley held this same position during the FY15 grant and will conduct draws, disbursements, and establish accounting and tracking systems for this grant.

iv. Acquiring Additional Resources: The City has procured the services of a QEC experienced with EPA and IBP to complete the technical site components of the project. The QEC was selected in compliance with federal procurement requirements (2 C.F.R. 200 and EPA's rule at 2 C.F.R. 1500). Our consultant will prepare all technical documents for EPA submittal. Should staff turnover or additional consultants such as a reuse planning/engineering firm be necessary, the city will be prepared to acquire these services using the same procurement process followed during the initial search for a QEC. In addition, having two dedicated city staff members involved with grant administration will ensure adequate cross-training in the event of staff loss and efficient training of incoming staff. The city will receive support from the community partners listed in section 2.b. and will utilize the services provided by the Technical Assistance to Brownfield (TAB) program.

4.b. Past Performance and Accomplishments; i. Currently Has or Previously Received an EPA Brownfields Grant: 1) Accomplishments: Rushville has a significant track record of securing and successfully administering a variety of financial resources, including EPA Brownfields Assessment grants, EDA Grants, IBP grant funding, Indiana OCRA grants, and litigation proceeds. The city was awarded an EPA Brownfields Community-wide assessment grant (BF00E01535) in 2015 for \$364,000. The city assessed 9 properties under this grant, and 170 temporary and 20 permanent jobs were created. Multiple success stories resulted from this grant, with some still underway, and most notably include the following. The transformation of the Bailey Property to the Rush 2 Work training center – this building has been a great resource to manufacturers in the area to use for employee training and development. The Campaign Quarters and Campaign Flats are two downtown housing projects that leveraged over \$10M in private funding and OCRA Stellar grants. The Campaign Quarters project received the Award for Excellence in Rural Housing from the Lieutenant Governor in 2020. We also removed an unsafe building from an adjacent brownfield site assessed during this grant, Vacant Lot/Old City Hall, and are utilizing this site as parking for Campaign Quarters residents.

(2) Compliance with Grant Requirements: During our FY15 period of performance, the city complied with the work plan, met the terms and conditions of the Cooperative Agreement, exceeded projected outputs, and completed and reported on all work conducted under this grant. All grant funds were expended with over 80% spent on direct assessment (i.e. Phase I/Phase II/cleanup planning). Timely ACRES entries/updates, quarterly and final closeout reports, annual financial reports, and document submittals were a priority for the city and, as such, all were submitted prior to their deadlines and approved by the EPA Project Officer.

Threshold Criteria Response

THRESHOLD CRITERIA RESPONSE

Community-Wide Assessment Proposal

1. Applicant Eligibility

The applicant is the City of Rushville, which is considered a local government as defined by 2 CFR 200.64 and is therefore eligible to apply for and receive U.S. EPA Brownfields Assessment Grant funding.

2. Community Involvement

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3. Expenditure of Existing Grant Funds

The City of Rushville does not have an open EPA Brownfields Assessment or Multipurpose Grant.

4. Contractors and Named Subrecipients

The City of Rushville has selected a consultant in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500.

- The City posted the Request for Qualifications on August 18th, 2023 on the City's Public/Legal Notices Website (<https://www.cityofrushville.in.gov/legal-ads-notices/>), in the local newspaper, Greensburg Daily News, and sent directly to 4 local environmental consulting firms, including one DBE firm. RFQ and posting notice are attached.
- The City's due date for the proposals was September 15th, 2023, giving consultants 4 weeks to submit a response.
- One firm, V3 Companies, Ltd., responded to the RFQ and, after price negotiations, we executed the contract on October 23, 2023. See attached for contract between the City and V3 Companies.