

K-IRPC***Kankakee-Iroquois Regional Planning Commission***

115 East Fourth Street, P.O. Box 127, Monon, Indiana 47959-0127



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** Economic/Community Development*** Arrowhead Country Public Transit*** K-IRPC Head Start Program*** Rural Transportation Planning*

**NARRATIVE INFORMATION SHEET
KANKAKEE IROQUOIS REGIONAL PLANNING COMMISSION
FY2023 U.S. EPA BROWNFIELDS HAZARDOUS SUBSTANCES AND PETROLEUM
ASSESSMENT GRANT APPLICATION**

1. Applicant Identification:

Kankakee Iroquois Regional Planning Commission (KIRPC)
115 E. Fourth St
Monon, Indiana 47959

2. Funding Requested:

- a) Assessment Grant type: Community-Wide
- b) Federal Funds Requested: \$300,000 (Hazardous Substances and Petroleum)

3. Location: City of Monon, White County, Indiana4. Target Area and Priority Site/Property Information: Target Areas are comprised of sites in Monon, Monticello and Delphi, Indiana. Priority site addresses/Census Tracts:

- a) Former Agricultural Feed Store and Fertilizer Plant, 213 Middlestadt Street, Monon, IN/18181958200
- b) Former Chicago Thread Factory, River St, Monticello, IN/18181958600
- c) *Former Dump, North 625 West, Delphi, IN/18015959600

5. Contacts:

a) Executive Director:

Mr. Edwin Buswell
KIRPC
White County, Indiana
PO Box 127
Monon, IN 47959
Phone: 219-253-6658 ext. 303
Email: elb@kirpc.net

b) Community Development Planner:

Ms. Emily Albaugh
KIRPC
White County, Indiana
PO Box 127
Monon, IN 47959
Phone: 219-253-6658 ext. 302

Email: emily@kirpc.net

6. Population: **Counties:** Benton (8,714), Carroll (20,444), Jasper (33,091), Newton (13,808), Pulaski (12,339), Starke (23,372), Warren (8,475) and White (24,651)

7. Other Factors Checklist:

Other Factors	Page #
Community Population is 10,000 or less (6 rural communities with less than 2,300 population may take advantage of the grant funds)	Page 1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority brownfield site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	Pages 1, 2, 3
The priority site(s) is in a federally designated flood plain (Levy Protection Zone).	Page 2
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	Page 3
30% or more of the overall project budget will be spent on eligible reuse planning activities for priority brownfield site(s) within the target area.	N/A

8. Letter from State of Tribal Environmental Authority: *Attached

9. Releasing Copies of Application: N/A

*Please note that the Starke County Gas Station/Auto Repair Target Area was replaced with the Delphi Former Dump Target Area after receipt of the IDEM Acknowledgement Letter dated November 8, 2023 and it is noted here within per discussion with Mr. John Morris, Indiana Brownfields Program.



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

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Eric J. Holcomb
Governor

Bruno L. Pigott
Commissioner

November 8, 2023

Mr. Edwin Buswell, Executive Director
Kankakee-Iroquois Regional Planning Commission
P.O. Box 127
Monon, Indiana 47959

Re: IDEM Acknowledgement Letter
U.S. E.P.A. Brownfields Grant Proposal
Community Wide Assessment Grant
KIRPC
Benton, Carrol, Jasper, Newton, Pulaski,
Stark, Warren, and White Counties

Dear Mr. Buswell:

This letter is provided in support of the Kankakee-Iroquois Regional Planning Commission (KIRPC) 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 KIRPC is requesting \$300,000 for hazardous substances and/or petroleum assessment.

IDEM understands that KIRPC has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program (Program) and that KIRPC, based on the information it has provided with its request, believes it has the capability to perform the proposed grant-funded activities. The requested coalition assessment grant funding will help KIRPC with community outreach, evaluating and prioritization of site inventory, conducting Phase I and Phase II Environmental Site Assessments and developing site-specific cleanup and reuse plans.

The focus of this initiative is to identify and assess potentially contaminated properties within the eight-county area, specifically focusing on the Town of Monon (Monon), White County targeted area (TA) including Former Agricultural Feed Store and Fertilizer Plant, Monticello, White County TA, River Road Properties, City of Knox (Knox), Starke County Gas Station/Auto Repair, and the Carrol County TA. The funds will directly improve the quality of life in the TAs by minimizing health risks and removing barriers to redevelopment which will spur much-needed economic growth. KIRPC has

numerous impoverished neighborhoods that contain numerous unsafe and underutilized brownfields.

Knox and Monon, Indiana (TA locations) suffer from poverty rates more than double the State rate at 31%. Minorities of Hispanic descent make up over half of Monon's population living in these conditions. Nearly 1 in 4 living in Monon has less than a 9th grade education. The most vulnerable, children under 5 years and under 18 years living in Knox suffer from poverty rates of 58% and 37%, respectively. The average Median Household Income (MHI) for the TA's is nearly 20% less the State of Indiana MHI (\$58,235). In Knox, the MHI is more than 30% less than the State MHI. Additionally, the ongoing opioid crisis in the KIRPC region and stagnant tax revenues have triggered a loss of money available for community reinvestment, including the redevelopment of brownfield sites.

Since KIRPC 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 KIRPC be awarded the requested grant funding, the Program will work together with U.S. EPA and KIRPC to determine site eligibility once KIRPC has established the sites intended for funding.

IDEM has worked with KIRPC on several projects. IDEM recognizes that KIRPC 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 KIRPC by providing technical and other assistance through the Program.

Based on the information submitted, IDEM considers the KIRPC 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 KIRPC 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

ARH/JTM

cc: (via electronic transmission)
Mr. Stephen Zins, SME

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i Overview of Brownfield Challenges and Description of Target Area: The Kankakee-Iroquois Regional Planning Commission (KIRPC) is a regional and economic development organization that encompasses 3,367 square miles and includes the eight west-central rural Indiana counties of Benton, Carroll, Jasper, Newton, Pulaski, Starke, Warren and White. KIRPC unifies the region with economic and community development services including brownfields redevelopment based upon the region's Comprehensive Economic Development Strategy (CEDS). KIRPC provides a voice to the 38 micro-communities (each with populations <10,000) and rural townships that comprise the eight counties (*total population for all 8 counties is 144,894; 2021 population estimate American Community Survey (ACS)*). The largest town has a population under 5,800 and two counties qualify as micro communities with total county population of less than 10,000 residents (*2021 population estimate ACS*). While KIRPC's region is rural, cumulatively problems created by brownfields rival that of a large city. The Great Recession of 2008 hit the region hard leaving the communities with the loss of major employers, tax revenues and creating abandonment of facilities and buildings that became brownfields. Furthermore, in 2018, St. Joseph College in Jasper County closed eliminating over 400 jobs. Two industrial facilities (Toll Integrated and Sabre Manufacturing) in Starke County closed between 2019 and 2020 further devastating local jobs. Overall, KIRPC's labor force employment dropped by over 5,000, doubling the unemployment from 2019 to 2020. Currently, unemployment is higher than the State level for over half of the KIRPC counties. Finally, an ongoing opioid crisis has gripped the KIRPC area costing the area millions of dollars in economic damages.

KIRPC previously used funds from their FY2015 U.S. EPA Assessment Grant to begin assessing brownfields across the region, assessing over 30 sites and successfully stimulating 19 brownfields redevelopments. Multiple brownfields in each of the counties, including 15+ sites from the 2015 inventory, have been identified and are now an endangerment to adjacent impoverished neighborhoods, many of which are home to minority populations. In the past five years, the immigrant population has doubled in many of the target area (TA) communities exacerbating environmental justice concerns. Grant funds will provide outreach, assessment, and cleanup planning needed to address individual priority brownfields. Area-wide nonpriority sites will be addressed in smaller towns if funding allows. KIRPC, in collaboration with their Environmental Justice Steering Committee will utilize this assessment grant to facilitate data collection to further identify sites with environmental disparities and injustices within the KIRPC region. Assessments will focus on the health and safety of disadvantaged areas and populations and revitalizing brownfields. This data can help advocate for cleaner and safer neighborhoods and make progress of environmental justice remedies. Additionally, knowing the intended reuse (e.g., recreational, residential, commercial) of properties being assessed will allow grant funds to be most effective and protective of all the end users. Cleanup planning funds can be utilized to support community stakeholders with future land use planning (e.g., riverfront recreational facilities, transportation equity) and climate resilience (e.g., solar arrays, EV charging and flood protection). KIRPC and its partners will be empowered through the strategic funding of this grant to provide employment opportunities for the economically disadvantaged and impoverished TAs and throughout the KIRPC region. In collaboration with their Environmental Justice Committee (EJC), KIRPC has chosen to focus on the following TAs.

Town of Monon TA has a population of 1,695, 55% of which are minorities (2022 Decennial Census), with disadvantaged neighborhoods adjacent to brownfields. The low household income and environmental justice issues due to susceptibility to potential contaminants emanating from brownfields will be a focus area of KIRPC and the EJC.

Monticello Downtown River Area TA is the heart of the City of Monticello, population 5,508 (2022 ACS). In 1974, Monticello experienced the most significant tornado in Indiana history. The tornado destroyed much of downtown and as a result many of the buildings were abandoned and pushed onto the banks of the Tippecanoe River. Although decades ago, many of the derelict buildings and foundations remain with potential contaminants impacting adjacent neighborhoods and the City's most-precious natural resource, the Tippecanoe River.

Delphi Former Dump TA is located adjacent to the Indiana Packers plant, one of the Midwest's premier food companies. The plant has exceeded their current footprint and needs to expand. However, the current plant is landlocked by surrounding industrial facilities and a roadway. The former dump, located on the north side of the current plant, serves as the ideal location for expansion and will ensure the longevity of the plants future plans to remain in the area.

1.a.ii Description of the Priority Brownfield Sites(s): The first Priority Site is 3-acre property consisting of a former agricultural feed store, fertilizer plant, and farm equipment/repair shop located at **213 N Middlestadt St Monon, IN** that operated along the Monon Railroad from the late 1950s to the early 1990s in the heart of downtown. The site is *abandoned, not fenced* and contains three industrial buildings (some with basements) that are deteriorated and collapsing. **The site presents high potential of off-site hazardous materials releases and vapor intrusion to adjacent homes. The unsecured property poses on-site exposure risk to children and invites illicit activities.** Suspected contaminants are metals, chlorinated solvents, and VOCs. Based on the age of the buildings, asbestos and lead-based paint are likely present. This site is a top priority due to the immediate needs to protect children and minority populations living alongside this unrestricted facility.

The second Priority Site is located within the **Monticello Downtown River Area**- which consists of over 0.75 miles along the Tippecanoe River. The +2.5-acre site, Chicago Thread factory, began operating in 1920's near the entrance to the Monticello Downtown River Area. Bryants, a subsidiary of Essex wire, operated at the site from 1944 until 1980 manufacturing vehicle wiring harnesses. In 1983, a portion of the property was used for storage and a wood pallet reconditioning business until the building was destroyed by fire in 2009. Remains of the building were demolished and buried on site. Most of the site is currently abandoned. **Based on the historical operations at this site, it is expected that soil and groundwater impacts are likely including VOCs, PAHs, PCBs and metals.** This site is a priority focus because of its long history of neglect, impacts to the Tippecanoe River and its planned redevelopment as part of the Monticello Redevelopment Commission's (MRC) Monticello Riverwalk project into a community greenspace walkway with much-needed housing and retail spaces for downtown. The third Priority Site is an approximately 45-acre **former dump**, located at **North 625 West, Delphi**, that ceased operations circa 40 years ago. The property is located along the north side of the Indiana Packers plant. Records were not available on the Indiana Department of Environmental Management (IDEM) Virtual File Cabinet (VFC) which is concerning as environmental conditions are assumed to be poor. Contaminants from historical operations likely include solid wastes, and construction and demolition materials. This site was chosen as a priority site because of its prime location and it is the only avenue for the expansion of the one the area's premier food production facilities. The lack of assessment of this site could lead to the lack of plant expansion or even relocation of the plant further restraining the area with the loss tax revenue and local jobs.

1.a.iii. Identifying Additional Sites: KIRPC's continuing commitment to community outreach is an integral part of this type of grant project to ensure use of the funds in a manner supported by the entire community. Due to the current inventory of brownfield sites and demand for assessment beyond the TAs, high priority will be placed on sites that can create near-term community investment and job creation; additionally, priority will be given to sites that can leverage state cleanup funding and will continue throughout the term of the grant.

1.b. Revitalization of Target Area

(i) Reuse Strategy, Alignment with Revitalization Plans: KIRPC's CEDS details a cohesive vision for livable rural communities through creation of new job opportunities; reinvesting in older downtown areas; and the prioritization of redevelopment and infill development of brownfields over development of prime agricultural land.

1. Town of Monon TA The very visible location of the former agricultural feed store and fertilizer plant in downtown Monon, adjacent to a residential neighborhood, makes this site prime for redevelopment. In fact, the Monon City Council is working with a national discount retail store chain pending site assessment. However, lack of funding for environmental assessments to determine the acceptable end-use of the site will be required.

2. Monticello Downtown River Area Neighborhood TA MRC's 2021 Monticello Riverwalk Plan details future goals of sitting areas along the Tippecanoe River, a Historical Society Plaza and a gazebo with seating. The MRC's expansion plans are in their third design phase and include affordable housing and shops along the walkway. MRC is currently working with multiple partners including the White County Historical Society, White County Tourism Authority and the Indiana Housing and Community Development Authority to match funding for this phase of this project. The Indiana Department of Natural Resources (IDNR) is assisting with floodway permitting within the TA. The reuse clearly aligns with all CEDS elements, especially encouraging economic development and enhancing attractiveness of a distressed area of Monticello on the Tippecanoe River. However, the abandoned factories and onsite burial of unknown materials are impeding further development and are in dire need of environmental assessment funding.

3. Former Dump, Delphi, IN TA The reuse of the former dump will provide Indiana Packers with the required space for expansion of a new cold-storage facility that is needed due to the recently added production and improvements to the plant. Unfortunately, the plant is landlocked by industrial users, a roadway and the former dump located adjacent to the north. Carroll County's EDC is currently working to assist the plant with much needed space for further expansion. However, due to the likelihood of contaminants within soil and groundwater this property will require assessment and likely remedial action and permitting.

(ii) Outcomes and Benefits of Reuse Strategy:

Town of Monon TA Although the unsecured, abandoned buildings at the former fertilizer facility and farm equipment/repair shop have become a danger to the eastern-adjointing neighborhood, this property is desirable for retail developers due to its size and downtown location. Retail operations in the neighborhood and town would fill a substantial need of shopping within walking distance for the community. Results from assessment activities will provide information needed by developers for mitigating building materials and site contamination. Besides removing an eyesore and *dangerous* building conditions, redevelopment of this site will secure economic benefits and include potential for up to **+20 local job opportunities** for the under/unemployed neighborhood residents and much-needed **tax revenue (approximately \$200,000/year)** generation for the town. The proposed retail store will use all LED lighting systems, on-site solar technology and Energy Star-rated refrigeration units.

Monticello Downtown River Area TA The EPA Assessment activities will provide information on continuing obligations required for prospective property owners to facilitate redevelopment that is already underway in portions of the TA. Project outcomes include evaluating and removing environmental risks to the adjacent residents and the Tippecanoe River. In 2022, the city applied for a \$1.5M Land and Water Conservation Grant that the city was to match \$500,000; however, the grant was not awarded due to the lack of available funding. The Tippecanoe River has been defined as, "one of the nation's most biologically diverse rivers, and the last stronghold of the federally endangered clubshell mussel". (Brent Frakes, U.S.F. & W.S, 2019), thus environmental assessment along the river is imperative. Economic benefits are increasing tax revenues and property values, and providing affordable housing, a community center, amenities, jobs for nearby residents and greenspace for the entire area. The overall redevelopment of this area will **exceed \$15M**. The goal of the community for the proposed greenspace is to utilize the most-effective and energy-efficient materials available. As such, photosensitive lighting is planned along the entire trail system and the trail itself will be composed of repurposed concrete removed from clean demolition projects within the area. Benches for the trail will consist of recycled plastics.

Former Dump, Delphi, IN TA Site investigation, cleanup and redevelopment are a priority to Delphi, a designated Stellar Community, for this site. With the assessment funds, they can conduct due diligence, soil and groundwater investigation and understand continuing obligations. The site is the only option available for the much-needed expansion of the Indiana Packers plant. This will be an opportune development not only for the plant but will bring immediate revenue to the area with construction costs **exceeding \$5M**. The expansion will create over **150 new jobs** and provide much-needed tax revenue to the local community. In anticipation of the expansion and need for additional housing, the City of Delphi recently broke ground on a **\$12.5M 68-unit apartment building**. Finally, with the planned expansion of the plant, Carroll County is planning a new correctional facility on a nearby parcel east of the current plant parcel. This facility will be strategically placed to provide work release options, expanding jobs, opportunities, and partnerships for the area. Due to the expanse of the dump, solar power is anticipated for much of the planned development needs.

1.c. Strategy for Leveraging Resources

1.c.(i) Resources Needed for Site Reuse: Assessments conducted during the FY2015 Grant allowed KIRPC communities to leverage **over \$56M** in private development and over **\$200K in Indiana Brownfields Program (IBP) Petroleum Orphan Sites Initiative (POSI)** funds to remove USTs. And, over **\$600K in Indiana's Office of Community & Rural Affairs (OCRA)** funds were used for streetscape improvements on the Jasper County train depot corridor (Section 4.b.i). These sources will be applied for, as appropriate, for assessed sites as part of FY2024 Assessment Grant. Furthermore, KIRPC will assist the TAs with accessing the IBP Revolving Loan opportunities (up to \$500,000) for cleanup grants. Additionally, each of the KIRPC counties currently operate Economic Development Income Tax (EDIT) funds for economic development and Pulaski County currently manages a Revolving Loan Fund (RLF) for new investment of capital assets in small businesses in the county.

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1.c.(ii) Use of Existing Infrastructure: KIRPC has access to all necessary infrastructure, roads, sewer, utilities which will be reused throughout the area. All modes of transportation – river, road, rail, and air, including the Tippecanoe River which is an essential part of a Monticello Downtown Riverwalk Area TA are available within the area. Multiple Class I and II railroads traverse through each of the KIRPC counties. US Interstate 65 dissects the eastern and western portions of KIRPC. In addition, multiple State Roads are present east and west of I65. South Bend International Airport is located within 40 minutes of the KIRPC area and six regional airports are located throughout the area. In 2021, the City of Delphi completed a \$13M water improvement project to prepare for current and future development in the industrial park. In 2022, NIPSCO completed a major overhaul of the gas line, increasing size of infrastructure to increase gas availability in this area. In 2024/2025, Delphi will be undertaking a \$30M wastewater improvement project to double the wastewater capacity to assist industrial growth which includes the Former Dump TA.

2.a. COMMUNITY NEED

2.a.i The Community’s Need for Funding: The EPA grant will provide assessment/cleanup planning funds that are not available in our TAs and if funding allows, nonpriority brownfields in other rural small towns. Monon residents suffer from poverty rates that exceed both state and federal levels at 20%. Minorities make up 60% of Monon’s population with poverty rates of nearly 50%. Nearly 1 in 4 living in Monon has less than a 9th grade education. The most vulnerable, children under 18 years, living in Delphi suffer from poverty rates of 45% with a quarter of them being children. The average Median Household Income (MHI) for the TAs is 20% less the State MHI. Over 65% of the residents in Delphi travel outside the county for work. Additionally, the ongoing opioid crisis in the KIRPC region and stagnant tax revenues have triggered a loss of money available for community reinvestment. Starke County ranks in the top 10 of 92 Indiana counties exceeding \$10,000 per capita cumulative economic damages arising from opioid epidemic. Three other KIRPC counties ranked in the top 50% of Indiana’s most financially impacted counties (*Indiana University, 2018*). In addition, KIRPC communities have experienced long-term funding challenges since 2010, when the State’s Constitutional Amendment to cap property tax rates went into effect. The EPA assessment grant will provide funds not otherwise available to help begin site assessment and cleanup planning efforts.

Table 1 summarizes demographics for the TAs compared to Indiana and the US.

TABLE 1: DEMOGRAPHICS: Census 2021	TA¹	TA²	TA³	Indiana	US
Population	1,695	5,508	3,691	6.6M	326.5M
% Minority	55.5	11.0	8.4	16.7	27.5
% Individuals income below 50% poverty level	15.5	7	31.2	12.9	12.8
% < 18 yrs. living below poverty level	23.4	4.9	36.8	17.0	17.4
% Unemployment	8.7	9.0	8.9	4.8	5.4
%Less than 9 th grade	23.8	4.5	10.66	3.6	4.9
Per Capita Income	\$19,619	\$24,953	\$19,196	\$32,537	\$37,638
Median Household Income	\$51,818	\$46,487	\$51,263	\$61,944	\$69,021

¹ *Town of Monon*, ² *Monticello Riverwalk Area*, ³ *Town of Delphi*

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: The TAs include communities with high concentrations of impoverished and underemployed residents. The percentage of minority populations (predominantly Hispanic residents) is nearly 60% in some TAs. More than 1 in 5 residents living in the TAs live *below* the poverty level in areas where lead paint in homes ranks in the 80-90 percentile. And, the most susceptible population, elderly and children, are present in these households at rates almost double those of the State and US levels. Poverty rates for children under 18 years in the TAs range from 14.1% to 37.3% compared to the State rate, 15.7%, (2021 ACS). These same residents also required food stamps and Cash Public Assistance Income at rates two to four times the State average. Over a quarter of the residents in Monon have less than a 9th grade education (Census 2021) and 25 to 42% of the residents in the TAs are female householders with no spouses. Due to these dismal statistics, our sensitive populations lack higher education, live in poverty and are impoverished children, elderly, and single-mother families.

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

The rates of incidence and mortality associated with cancer and respiratory diseases in TA counites (Carroll and White) are elevated. Cancer incidence and death rates, and chronic lower respiratory deaths for Carroll

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and White Counties, along with comparison to Indiana and national incidence and rates are presented below in Table 2 (data are not available below the County level.)

Indicator	White Co.	Carroll Co.	Indiana	U.S.
All cancer deaths ^{1,3}	175.0	465.2	167	149.4
Lung/Bronchus cancer incidence ^{1,3}	68.1	100.5	55.6	54
Lung/Bronchus cancer deaths ^{1,3}	50	66.3	45	35.0
Chronic Lower Respiratory deaths ^{2,3,4}	65.3	45.5	55.2	49

¹ statecancerprofiles.cancer.gov (2016-2020); ² CDC Wonder; ³ Indiana Dept. of Health⁴ cases per 100,000 population

White County ranks 11th out of 92 counties where Lung/Bronchus cancer incidence rate exceed the State incidence rate. Lung cancer incidence and deaths, and chronic lower respiratory deaths exceed U.S. rates for both Carroll and White County. Lung/Bronchus cancer deaths and chronic lower respiratory deaths in Carroll County are nearly twice the U.S. rate. The assessment grant will support characterizing threats the priority brownfields pose to human health and the environment.

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

The range of EJ Index percentiles for our TAs were: Particulate Matter 14 to 44; Diesel PM 56 to 60; Lead Paint 83-86; Superfund Proximity 64 to 66; RMP Facility Proximity 46 to 78; Hazardous Waste Proximity 17 to 81; and USTs 64 to 90. Overall, these indexes are higher than 60% of all block groups in Indiana. The KIRPC region contains seven disadvantage tracts, which encompass each of the TAs, due to exceedance of burden and socioeconomic thresholds. The average MHI for the TAs is \$49,856 compared to the State MHI of \$61,944 and U.S. MHI \$69,021 (See Table 1). The presence of brownfields in the KIRPC region creates areas of blight and decreases property values; as such median home values in the TAs range from \$111K to \$119.2K compared to the Indiana and U.S. median values of \$158.5K and \$229.7K, respectively (2016-2021 ACS). Target area homes built prior to 1970 range from 72% to 89% of the housing stock with potential health exposures to friable asbestos and lead paint.

(3)b. Environmental Justice: Advancing Environmental Justice

KIRPC will utilize this assessment grant to facilitate data collection to identify environmental disparities and injustices. KIRPC’s EJC is comprised of local community leaders that will focus on health and safety of disadvantaged areas and populations and revitalizing brownfields to advocate for change/cleanup and make progress of environmental justice planning for all KIRPC residents. Through research, we will initiate cleanup planning funding for those most in need and to make them the most effective and protective of the end users. Cleanup planning funds can be utilized to support community stakeholders with future land use planning (e.g., riverfront recreational facilities, transportation and affordable housing equity) and climate resilience (e.g., solar arrays, flood protection, etc.). KIRPC’s EJC will be empowered through the strategic funding of this grant to provide employment opportunities and healthy, active lifestyle infrastructure for the economically disadvantaged and impoverished.

2.b. Community Engagement

2.b.i Project Involvement and (ii)Project Roles: The partners listed below represent entities who will be engaged in eligible grant activities. KIRPC collaborates with these partners to assist communities throughout their 8-County region.

Partner Name	Point of contact (name, email & phone)	Specific involvement in the project
EJ Committee	Rosemary Cooley, Town Council President [REDACTED] 219-863-0367	Coordinate with KIRPC officials to address EJ concerns of TA residents. They will ensure involvement of all community members with respect to assessment, development, implementation of sites within the TAs and other brownfield sites.
	Edgardo Martinez Iganna, Business Owner/Resident [REDACTED]	

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<p>City of Monticello</p> <p>Monticello Next Generation Youth Advocates</p>	<p>Cathy Gross, Mayor mayor@monticelloin.gov 574-583-9889</p> <p>Carol Conrad cconrad@twinlakes.k12.in.us 574-583-7211</p>	<p>Coordinate public involvement & solicit input regarding assessment & redevelopment planning for the Riverwalk priority site.</p> <p>Community planning and fundraising for community-based projects</p>
<p>Carroll County Economic Development Foundation</p> <p>Carroll County Community Leadership</p>	<p>Jake Adams, Executive Director jadams@carrollcountyedc.com 765-432-4224</p> <p>Julia Leahy, Carroll Co. Chamber of Commerce, Executive Director 765-564-6757</p>	<p>Inform local residents of the planned assessment and cleanup planning of the Former Dump priority site.</p> <p>Community engagement, outreach and support.</p>
<p>Local Economic Development Organizations (LEDOs)</p>	<p>Randy Strasser, White County LEDO rstrasser@whiced.com 765-421-8191</p> <p>LEDOs for Benton, Carroll, Jasper, Newton, Pulaski, and Warren Counties, as appropriate</p>	<p>Inform LEDOs of businesses of grant availability, future cleanup & redevelopment potential of the priority sites in White & other assessed sites in the 8-County region. Gather input from LEDOs to identify non-priority sites to be assessed; identify & leverage other funding programs.</p>

2.b.iii Incorporating Community Input: KIRPC is supported by a 45-member board of directors consisting of town and county elected officials, economic development professionals, EJC members and representatives from private businesses/nonprofits. The EJC community leaders will ensure meaningful involvement and input of all people within the KIRPC community regarding environmental justice. All tasks and prioritization activities will be shared with the board on a monthly basis which provided a unique opportunity for widespread outreach through board members across the region. The plan to involve stakeholders will include three primary efforts: **1)** KIRPC and the 8 County LEDOs will announce the Grant award in press releases to local newspapers and in ads placed on local radio stations and local Public Access Television stations to reach residents at all education and access levels. The announcement will also be posted on KIRPC’s website and social media (Facebook) page. Key community organizations (Section 2.b.i) will be given information for distribution. KIRPC will work with the EJC and individual community associations to develop a pipeline for resident input and concerns to share with KIRPC. Individual communities can identify sensitive populations and non-English speaking residents for development of outreach materials. **2)** KIRPC will host an initial outreach and “kick-off” meeting to acquaint LEDOs, the EJC, key community organizations, environmental organizations, educational institutions, and the media with the grant project. KIRPC will ask stakeholders to identify additional brownfields they feel are impacting their health and welfare. Meeting outcomes will be distributed as described above **3)** KIRPC will continue communication with stakeholders. Additional public meetings and presentations will be coordinated by KIRPC and applicable LEDOs as requested by community organizations. At the close of the project, KIRPC will hold a final public meeting to share project outcomes. Presentation materials and minutes will be archived and placed on the KIRPC’s website and social media pages. KIRPC will request input from the general public.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Description of Tasks/Activities and Outputs: KIRPC will use the grant to assess priority sites in the TAs and other high-risk and developable sites (i.e., non-priority sites) identified during the 4-year performance period and support cleanup and redevelopment of these brownfields. Project implementation, schedule, and costs are based upon KIRPC’s FY2015 EPA Grant experience. The following four tasks will be implemented to accomplish this plan.

<p>Task 1 – Programmatic</p> <p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • The Work Plan will be prepared and the Cooperative Agreement (CA) will be executed. • A Qualified Environmental Professional(s) (QEP) will be retained in compliance with applicable federal procurement regulations. • Quarterly reports will be submitted to the U.S. EPA; the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) will be updated; and MBE/WBE/DBE and final project closeout documentation will be submitted. • Staff will attend brownfields training programs. • Project “kick-off” meetings will be hosted by KIRPC for each TA. <p><u>ii. Anticipated Project Schedule</u></p> <ul style="list-style-type: none"> • The Work Plan will be prepared within 1st month and QEP will be retained before 3rd month of award. • Quarterly reports will be submitted within 30 days of the end of the quarterly reporting period, beginning in January 2024. ACRES will be updated as sites are assessed. ACRES will be updated with cleanup and/or redevelopment information during and/or after the performance period. MBE/WBE/DBE reports will be submitted annually. Final project closeout documentation will be submitted once the performance period ends. • Staff will attend brownfields training programs as available during the grant period. <p><u>iii. Task/Activity Lead</u></p> <p>KIRPC will conduct programmatic oversight and outreach activities during the performance period.</p> <p><u>iv. Outputs</u></p> <p>Work Plan, CA, quarterly reports (16); ACRES updates; MBE/WBE/DBE reports; final project closeout documentation; and staff training.</p>
<p>Task 2 – Community Outreach</p> <p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • Community Outreach Activities include press releases, updating KIRPC’s website and social media as well as community-based partners’ websites, and conducting site specific meetings. • Assistance will be requested from applicable County health departments as appropriate throughout the performance period to understand and prioritize health risks at brownfield sites identified for assessment. <p><u>ii. Anticipated Schedule</u></p> <ul style="list-style-type: none"> • A project “kick-off” meeting held within one month of receiving notification of the grant award. • Community outreach activities will continue throughout the performance period. <p><u>iii. Task/Activity Lead</u></p> <p>KIRPC will be the lead and work with EJ committee, LEDOs and QEP(s) on outreach activities during the performance period.</p> <p><u>iv. Outputs</u></p> <p>Updated websites and social media and site meetings to develop outreach materials for stakeholders.</p>
<p>Task 3 – Site Inventory</p> <p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • Soliciting input for sites region-wide; interviewing stakeholders and visiting sites to determine if projects meet eligibility and prioritization scoring criteria. Non-priority sites will be evaluated and added to the inventory. TA-related sites will receive higher prioritization ranking. <p><u>ii. Anticipated Schedule</u></p> <ul style="list-style-type: none"> • The prioritization system will be developed within three months of grant award. • Non-priority sites will be added to the inventory throughout the 4-year performance period.

NARRATIVE/RANKING CRITERIA: FY 2023 KIRPC ASSESSMENT GRANT

<p><u>iii. Task/Activity Lead</u> The KIRPC will be the lead and work with EJ members, LEDOs and QEP(s).</p>
<p><u>iv. Outputs</u> An updated and comprehensive inventory of brownfield sites within the KIRPC region.</p>
<p>Task 4 – Site Assessment</p>
<p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • Priority sites and non-priority sites identified during the performance period will be evaluated through performance of Phase I and/or Phase II assessments, conducted in accordance with All Appropriate Inquiry (ASTM Standard E1527-21) and other ASTM standards/practices. Health & Safety Plan (HASP) will be prepared prior to each Phase II assessment. • QEP(s) will prepare a Quality Assurance Project Plan (QAPP) and submit it to the U.S. EPA for approval. • Assessments on both priority and other sites following securing site access will continue. • KIRPC will coordinate activities with stakeholders/TAs/Board/Partners. <ul style="list-style-type: none"> • KIRPC and QEP(s) will meet to ensure required site access has been secured, individual assessments are progressing, and the overall project schedule is met.
<p><u>ii. Anticipated Schedule</u></p> <ul style="list-style-type: none"> • Phase I and/or Phase II assessments will begin within one month of approval and continue throughout the term. • Phase II Assessments will begin once the QEP(s) receives U.S. EPA approval of their Quality Assurance Project Plan (QAPP) (anticipated to be accomplished within three months of QEP selection). • Assessments on both priority and non-priority sites after securing site access will continue throughout the performance period. • KIRPC staff will meet with prospective purchasers/developers to determine specific project needs. • KIRPC and QEP(s) will meet monthly to ensure required site access have been secured, individual projects are progressing, and the overall project schedule is met.
<p><u>iii. Task/Activity Lead</u> The QEP will lead this task. The QEPs have the specific educational and experience required for complying with All Appropriate Inquiry.</p>
<p><u>iv. Outputs</u> Outputs include one QAPP and an anticipated 8 Phase I, 4 HMA, and 6 Phase II ESA reports.</p>
<p>Task 5 – Cleanup Planning</p>
<p><u>i. Project Implementation</u></p> <ul style="list-style-type: none"> • Cleanup/redevelopment planning as required by various state of Indiana programs for sites (priority and non-priority sites that are assessed using the grant) where redevelopment is imminent. Assessment of brownfields cleanup/redevelopment alternatives, evaluation of needed institutional and engineering controls, and preparation of cleanup and reuse plans.
<p><u>ii. Anticipated Schedule</u> Cleanup planning for selected sites will continue throughout the performance period. Site status and Comfort Letter requests submitted to IBP for prospective purchasers/developers/owners. State Letters issued after state-determined waiting period.</p>
<p><u>iii. Task/Activity Lead</u> The QEP will lead this task. QEPs have the educational and technical experience required for evaluating/mitigating hazardous/petroleum releases to the environment.</p>
<p><u>iv. Outputs</u> Outputs include at least four cleanup planning documents.</p>

b. Cost Estimates: Approximately 91% of the \$300,000 budget will go directly to site assessment and cleanup planning activities and none to direct administrative costs or indirect costs. No expenses will be incurred for equipment or fringe benefits. Costs are based on KIRPC’s experience with the FY2015 Assessment Grant.

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Task 1 – Programmatic:

- **Personnel costs: \$12,000;** 240 hours at \$50/hour for procurement, tracking outputs, program reporting, financial tracking (100 hrs.); QEP and KIRPC monthly progress meetings and outreach activities outlined above (190 hrs.)
- **Travel costs: \$4,000;** Two people to attend National Brownfield Conference: (\$2,000 per person: \$700 Airfare, three nights hotel \$700, four days per diem and incidentals \$600)
- **Contractual: \$4,000; \$1,200-**technical summaries for 16 quarterly reports; **\$2,800-** attendance at monthly progress meetings and stakeholder meetings throughout term of grant

Task 2 – Community Outreach:

- **Personnel costs:** Community outreach costs of **\$2,500** include contractual costs of \$2,000 for coordinating/conducting community involvement and outreach meetings and City costs of \$500 (supplies) for preparing, printing, and mailing project information and marketing documents.

Task 3 - Site Inventory

- **Personnel costs: \$2,000;** 40 hrs.@ 50.00/hour for prioritization of sites, stakeholder interviews and meetings, project site visits throughout the grant term
- **Contractual: \$2,500-** to assist in site selection and prioritization

Task 4 – Site Assessment:

- **Personnel costs: \$2,000;** 40 at \$50/hour for meetings with stakeholders regarding site eligibility and site access prior to assessment.
- **Contractual:**
 - 8 Phase I ESAs at average cost of \$4,000 = **\$32,000;** 6 Phase II ESAs at average cost of \$5,333 = **\$32,000** = **\$192,000;** 4 Hazardous Materials Assessments at average cost of \$6,000 = **\$24,000;** 1 QAPP = **\$2,000**

Task 5 – Cleanup Planning:

- **Personnel: \$5,000-**100 hrs. @ \$50.00/hour for contractor oversight, report review, and stakeholder meetings
- **Contractual costs:** 4 cleanup and reuse plans at average cost of \$4,000 = **\$16,000**

KIRPC EPA Brownfields Assessment Budget Request						
Program Tasks	Programmatic	Outreach	Site Inventory	Site Assessments	Cleanup Planning	Budget
Budget Categories						
Personnel-(non-admin) ²	\$12,000		\$2,000	\$2,000	\$5,000	\$21,000
Travel	\$4,000		\$0	\$0	\$0	\$4,000
Supplies		\$500				\$500
Contractual	\$4,000	\$2,000	\$2,500	\$250,000	\$16,000	\$274,500
Total Direct Costs¹	\$20,000	\$2,500	\$4,500	\$252,000	\$21,000	\$300,000

¹No indirect costs will be incurred; ² In-kind KIRPC staff time will be contributed for amounts over those accounted for under personnel.

c. Measuring Environmental Results KIRPC will diligently track, measure and report outputs (e.g., the number of Phase I and Phase II assessments, cleanup plans, and meetings) and outcomes (e.g., acres of land assessed; land remediated and redeveloped; acres of parks and greenspace preserved or created; number of jobs created or retained; tax revenue generated; redevelopment investment value; and other funding leveraged) in ACRES. The actual outputs will be compared to the estimated number of outputs listed in Section 3.a. KIRPC will document outcomes/outputs that cannot be easily entered into ACRES (i.e., website updates, staff training, outreach/meetings) in quarterly reports. KIRPC will also evaluate the extent to which the outputs result in the protection of human health and the environment. KIRPC will evaluate the project progress semi-annually and, if goals are not being met, will meet with local stakeholders and the QEP to discuss the shortcomings and adjust the project approach.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability; 4.a.i Organizational Capacity; and 4.a.ii Organizational Structure: KIRPC has been in operation for over 49 years and has an experienced team well-versed at the implementation of

NARRATIVE/RANKING CRITERIA: FY 2023 KIRPC ASSESSMENT GRANT

state and federal grant programs (over \$100M) including the most recent FY2015 EPA Brownfields Grant. Their guiding principles are in their CEDS, a document that unifies the region and defines the regional strategy to improve and strengthen community and economic conditions and opportunities. KIRPC will execute the CA and ensure compliance, as well as be responsible for financial tracking, outreach to stakeholders and liability management. Representatives (e.g., EJC, LEDOs; Section 2.b.i) and each of the member counties and TA stakeholders will provide input on site selection/prioritization, land assembly, and other regional economic impacts throughout performance period. Procurement of a QEP, site selection, prioritization of sites and other key decisions to be made by KIRPC staff will be overseen and approved by the KIRPC Board (includes all TAs).

4.a.iii Description of Key Staff: Mr. Edwin Buswell, AICP, KIRPC's Executive Director, has been with KIRPC for over 28 years and managed nearly \$50M in federal and state grants, will be the project manager. Ms. Emily Albaugh, Community Development Planner for KIRPC, for over 10 years, will use her network of community contacts in the region to generate community outreach opportunities. Ms. Lynette Carpenter, CPA for over 20 years with KIRPC, will provide financial tracking and documentation requirements. As KIRPC's legal counsel for over 20 years, Mr. Daniel Blaney, will assist KIRPC with liability management issues.

4.a.iv. Acquiring Additional Resources: KIRPC has managed the procurement of contractors for multiple state and federal grant projects in compliance with federal procurement regulations (40 CFR §31.36) and includes guidance to attract and utilize minority- and women-owned businesses, as possible. As the Grantee, KIRPC will use their established procurement process to retain a highly competent QEP to assist in managing and tracking the activities funded by the grant. The QEP will be experienced in all aspects of U.S. EPA Assessment Grant management and will have demonstrated extensive experience with, and understanding of, the Indiana Voluntary Cleanup Program (VCP), POSI and U.S. EPA Assessment Grant programs, and will have managed at least three successful brownfields redevelopment projects where multiple brownfields redevelopment financing incentives were leveraged.

4.b. Past Performance and Accomplishments

4.b.i Currently has or Previously Received an EPA Brownfields Grant

(1) Accomplishments: KIRPC was the recipient of a FY2015 Brownfields Assessment Grant for hazardous substances (\$300K) and petroleum (\$200K). Outputs included a brownfields inventory, community outreach meetings, 20 Phase I ESAs, 10 Phase II ESAs, 2 Hazardous Materials Reports, 1 UST Closure Report, and 1 State Closure Letter. To date, KIRPC communities have leveraged over \$56M in private development. Three success stories are presented below.

- The Sweetener Supply Company expanded their operations into a former brownfield site in White County investing \$26M in capital improvements and providing 35 local full-time jobs.
- Remington (Jasper County) assessed a former train depot using grant funding, acquired and leveraged \$450K in private investment to redevelop the site. In, 2021/2022, the town updated the streetscape through a \$600K grant from Indiana's OCRA and \$1.0M in local tax increment financing.
- The Vanguard National Trailer Corporation invested \$30M into a new 250,000 square foot refrigerated trailer manufacturing facility at a former brownfield in Monon. To date over 75 full-time jobs have been created.

(2) Compliance with Grant Requirements: The FY2015 assessment grant, which closed September 30, 2018, was managed in compliance with grant requirements. KIRPC developed a Work Plan and successfully executed the CA with the U.S. EPA. KIRPC conducted community engagement programs, complied with financial status reporting requirements, and successfully updated ACRES throughout the performance period and continues to update ACRES with cleanup, investment and redevelopment data as appropriate. Of the \$500,000 in FY2015 assessment grant funding, \$2,820.81 (0.5% of the total budget) in the contractual budget was unspent at the end of the performance period. At the time of the grant completion, the remaining funds were not adequate for further assessment at other sites.

THRESHOLD CRITERIA

**FY2024 USEPA BROWNFIELDS
HAZARDOUS SUBSTANCES AND
PETROLEUM ASSESSMENT GRANT APPLICATION**

Kankakee-Iroquois Regional Planning Commission

RESPONSES TO THRESHOLD CRITERIA

1. Applicant Eligibility: The Kankakee-Iroquois Regional Planning Commission (KIRPC), grantee for this assessment grant, is a Regional Council created under Indiana Code 36-7-7 (attached).
2. Community Involvement:

Partner Name	Point of contact	Specific involvement in the project
Environmental Justice Committee	Rosemary Cooley, Town Council President [REDACTED] 219-863-0367 Edgardo Martinez Iganna, Business Owner/Resident [REDACTED]	Coordinate with KIRPC officials to address EJ concerns of all TA residents and assist in redevelopment efforts by marketing the priority sites and other assessed sites.
City of Monticello	Cathy Gross, Mayor mayor@monticelloin.gov 574-583-9889	Coordinate public involvement & solicit input regarding assessment & redevelopment planning for the Riverwalk priority site.
Monticello Next Generation Youth Advocates	Carol Conrad cconrad@twinlakes.k12.in.us 574-583-7211	Planning and fundraising for community-based projects
Carroll County Economic Development Foundation	Jake Adams, Executive Director jadams@carrollcountyedc.com 765-432-4224	Inform local residents of the planned assessment and cleanup planning of the Former Dump priority site.
Carroll County Community Leadership	Julia Leahy, Carroll Co. Chamber of Commerce, Executive Director 765-564-6757	Community engagement, outreach and support.
Local Economic Development Organizations (LEDOs) attract, retain and expand businesses in Indiana. The LEDOs, one in each county,	Randy Strasser, White County LEDO rstrasser@whiced.com 765-421-8191 LEDOs for Benton, Starke, Jasper,	Inform businesses of grant availability, future cleanup & redevelopment potential of the priority sites in White & other assessed sites in the 8-County region. Identify non-priority sites to be assessed;

promote local economic issues to help businesses succeed.	Newton, Pulaski, and Warren Counties, as appropriate	identify & leverage other funding programs.
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KIRPC is supported by a 45-member board of directors. The board members consist of town and county elected officials, economic development professionals, EJC Steering Committee members and representatives from private businesses/nonprofits. All tasks and prioritization activities associated with the FY2015 EPA Brownfields Grant were shared with the board on a monthly basis which provided a unique opportunity for widespread outreach through board members across the region. KIRPC will continue this successful community input strategy and work with LEDOs, individual TA leadership, residents/property owners, community/citizens groups, community-based partners, and the lenders and developers conducting or supporting the actual work.

As with the FY2015 Assessment Grant, the plan to involve stakeholders will include three primary efforts: 1) KIRPC and the 8 County LEDOs will announce the Grant award in press releases to local newspapers and in ads placed on local radio stations and local Public Access Television stations to reach residents at all education and access levels. The announcement will also be posted on KIRPC’s website and social media (Facebook) page. Key community organizations (Section 2.b.i) will be given information to distribute and place on their websites. KIRPC will work with the EJC and individual neighborhood associations to develop a pipeline for resident input and concerns to share with KIRPC. Individual neighborhoods can identify sensitive populations and non-English speaking residents for development of outreach materials. 2) KIRPC will host an initial outreach and “kick-off” meeting to acquaint LEDOs, the EJC, key community organizations, environmental organizations, educational institutions, and the media with the grant project. KIRPC will ask stakeholders to identify additional brownfields they feel are impacting their health and welfare. These sites will be added to KIRPC’s list of potential sites for funding. Meeting outcomes will be distributed through KIRPC and LEDO websites and community social media pages and a newsletter. 3) KIRPC will continue communication with stakeholders. Additional public meetings and presentations will be coordinated by KIRPC and applicable LEDOs as requested by community organizations. At the close of the project, KIRPC will hold a final public meeting to share project outcomes. Presentation materials and minutes will be archived and placed on the KIRPC’s website and social media pages. Social media, community websites and newsletters will be used to reach out to and gather input from the general public. Meeting outcomes will be distributed through such means as posting on websites and social media pages, distribution of newsletters, and distribution of press releases

Named Contractors and Subrecipients: NA

3. **Expenditure of Assessment Grant Funds:** KIRPC does not have an active EPA Brownfields Assessment Grant. Their FY2015 U.S. EPA Coalition Assessment grant expired on September 30, 2018.