



**GREATER
LAWRENCE COUNTY
AREA**

LAWRENCE ECONOMIC DEVELOPMENT CORP.

P.O. Box 488
South Point, Ohio 45680-0488
740-377-4550 800-408-1334
FAX 740-377-2091

**NARRATIVE INFORMATION SHEET
LAWRENCE ECONOMIC DEVELOPMENT CORPORATION
FY24 U.S. EPA BROWNFIELD ASSESSMENT GRANT APPLICATION**

1. Applicant Identification:

Lawrence Economic Development Corporation (LEDC)
216 Collins Avenue
South Point, Ohio 45680-0488

2. Funding Requested:

- a) Assessment Grant type: Community-wide
- b) Federal Funds Requested: \$500,000

3. Location: Lawrence County, Ohio

4. Target Area and Priority Site Information:

- Target Area: 3rd Street/Ohio River Corridor
- Target Area Census Tracts: 39087050300, 39087050200, and 39087050100
- Priority Sites:
 - Former Wilson Glove Building
1603 S 3rd Street, Ironton, Ohio
 - The Ironton Machine Shop
1214 S 2nd Street, Ironton, Ohio

5. Contacts:

- a) Project Director:
Jeremy Clay, Associate Executive Director
216 Collins Avenue, South Point, Ohio 45680-0488
Phone: 740.377.4550, Email: jeremy@ledcorp.org
- b) Chief Executive:
Bill Dingus, Ph.D., Executive Director
216 Collins Avenue, South Point, Ohio 45680-0488
Phone: 740.377.4550, Email: dingus@ohio.edu

6. Population: 58,570

(U.S. Census Bureau, census.gov, 2021: American Community Survey 1-Year Estimates Data Profiles)

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	No
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No
The priority brownfield site(s) is impacted by mine-scarred land.	No
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).	1
The priority site(s) is in a federally designated flood plain.	1
The reuse of the priority site(s) will incorporate energy efficiency measures.	5
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	5
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.B., for priority site(s) within the target area(s).	No
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013) or is closing.	No

8. Letter from State or Tribal Environmental Authority: Attached

**SUPPORT LETTERS FROM OHIO ENVIRONMENTAL PROTECTION
AGENCY AND BUREAU OF UNDERGROUND STORAGE TANK
REGULATIONS**

November 1, 2023

U.S. Environmental Protection Agency, Region 5
ATTN: Ashley Green
77 West Jackson Boulevard
Mail Code SB-5J
Chicago, IL 60604-3507

**RE: Lawrence Economic Development Corporation Community Wide Assessment Grant
Proposal**

Dear Ashley Green:

I am pleased to offer Ohio EPA's support for the Lawrence Economic Development Corporation (LEDC) Community Wide Assessment Grant Proposal. LEDC is applying for a community-wide assessment grant with funding totaling \$500,000. We have worked with LEDC in the past and hope to provide support under the Assessment, Cleanup and Revolving Loan Fund Grant program established by the Small Business Liability Relief and Brownfield Revitalization Act (P.L. 107-118).

The funding LEDC is requesting under their community-wide assessment grant proposal will be used to conduct multiple Phase I/II environmental site assessments, hazardous materials (e.g., asbestos) assessments, and preparation of cleanup planning documents. The main target area for the grant was identified due to economic development potential. The former heavily industrialized "3rd Street/Ohio River Corridor" (The Corridor) is in Ironton, which is essentially a four-mile stretch of "industrial brownfields" from the heart of downtown south to the Village of Coal Grove. The Corridor is prime for redevelopment given the number of abandoned industrial/commercial sites along this stretch.

A Priority Site in The Corridor is the former Wilson Glove Building located at 1603 S 3rd Street in Ironton. The multi-story structure was constructed in the mid-1920s by the Selby Shoe Company for manufacturing purposes. The Wilson Athletic Goods purchased the property in the mid-1940s and manufactured sporting goods equipment until the mid-1980s. Since then, the property was acquired by private ownership and fallen into disrepair. Given its prominent location, size (nearly 2.5 acres), and close proximity to residential neighbors, the community would benefit from its revitalization.

Another Priority Site is located at 1214 S 2nd Street in Ironton, owned by J&M Maynard Enterprises, Inc. This property was utilized as a machine shop as early as 1909 through at least the 1960s and was surrounded by industrial properties, a rail line, and residential properties. This 0.85-acres property is situated on a full city block has been underutilized for decades and is ripe for redevelopment. The intent for both sites is to conduct environmental assessments and prepare cleanup planning documents to entice potential investors.

We look forward to working with the Lawrence Economic Development Corporation and U.S. EPA on this project. If you have any questions, please do not hesitate to contact me at 614-644-2295 or via e-mail at Lisa.Shook@epa.ohio.gov.

Sincerely,

Lisa Shook

Lisa Shook, Manager

Ohio Environmental Protection Agency

Voluntary Action Program

cc: Jeremy Clay, Associate Executive Director, Lawrence Economic Development Corporation

Kristy Hunt, Ohio EPA, DERR/SEDO



**Department
of Commerce**

Division of State Fire Marshal

Mike DeWine, Governor
Jon Husted, Lt. Governor

Sheryl Maxfield, Director



October 26, 2023

John Jurevis
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Mail Code SE-7J
Chicago, IL 60604-3507

**RE: Lawrence Economic Development Corporation Community Wide Brownfield Assessment
Grant Proposal**

Dear Mr. Jurevis:

This letter acknowledges that the Lawrence Economic Development Corporation notified the Office of the Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR) of its plans to use the \$500,000 grant proposal for a community-wide brownfield assessment for petroleum and hazardous waste. The targeted area for this grant is the 3rd Street/Ohio River Corridor in Ironton and the village of Coal Grove. These areas have high unemployment and poverty rates, historic manufacturing and industrial brownfields, acres of vacant or underdeveloped properties. Goals of the grant include assessment of blighted areas, improving access to infrastructure, promoting economic growth, and revitalizing neighborhoods.

I am pleased to offer BUSTR's support for the Lawrence Economic Development Corporation's Community Wide-Brownfield Assessment Grant proposal. We look forward to working with the Mid-Ohio Regional Planning Commission and the U.S.EPA on this project.

Sincerely,

Christine G. Pyscher, P.G.
Environmental Specialist
Division of State Fire Marshal
Ohio Department of Commerce

xc: Site File
Jeremy Clay, Lawrence Economic Development Corporation

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

(i) **Overview of Brownfield Challenges and Description of Target Area:** Lawrence County (the County), the southernmost county in Ohio, is in the heart of Appalachia. At the turn of the 19th century, the County became a centerpoint of iron production, with numerous iron furnaces and forges in operation. The iron industry played a crucial role in the County's economy and growth. Mining in the area was lucrative due to the rich iron ore, coal, and the proximity to the Ohio River for transport. By the mid-1800s the region, including the city of Ironton, produced the majority of iron used in the United States, and local foundries were responsible for most of the ordnance used by the Union Army during the Civil War. However, steel rapidly replaced iron in the 20th century, consequently leaving Ironton and the County with little commerce to replace the once booming iron industry.

The 2021 population of the County was 58,570¹ and with a population of 10,647 people¹, Ironton is the county seat and only city in the County; the remaining communities in the County are villages or townships with populations well less than 10,000. The long, heavy manufacturing history has left this small county with three Superfund sites along with numerous vacant or underutilized former industrial sites. Ironton's industrial history is a testament to the rise and fall of the iron and steel industries in the United States. While the city's industrial landscape has changed over the years, the legacy of its iron heritage remains an important part of its identity. However, that identify is expressed by an abundance of blighted brownfield properties. Despite that, Ironton is adapting to a changing economic landscape and highlighting its historical significance .

The Lawrence County Economic Development Corporation (LEDC) is the economic engine for the County and focuses on redevelopment of underutilized/brownfield properties to promote investment and job creation in the County. Revitalization of these formerly industrialized communities proves difficult in this economically depressed part of Appalachia. The region faces economic challenges, including higher poverty rates, lower median household incomes, and higher percentage of SNAP benefits and uninsured individuals compared to the state and federal averages. Historically, the decline of industry and manufacturing in the region has contributed to economic hardships. However, LEDC has an established track record in revitalization and redevelopment projects in the County that will be enhanced by this grant and will attract new businesses, create/retain jobs, and improve quality of life for residents.

The Target Area for the assessment grant was identified due its economic development potential. The former heavily industrialized “**3rd Street/Ohio River Corridor**” (**The Corridor**) in Ironton which is essentially a four mile stretch of industrial brownfields from the heart of downtown, south to the Village of Coal Grove. The Corridor is prime for redevelopment given the number of abandoned industrial/commercial sites along this stretch and their potential, especially given their river frontage. In addition, these industrial sites in The Corridor are adjoined by low-income residences directly impacted (both environmentally and economically) by the multitude of brownfields, literally in their backyards. Based on review of the Climate and Economic Justice Screening Tool (CEJST), **two of the three census tracts (CTs) in The Corridor are identified as disadvantaged** with the burden and socioeconomic thresholds being exceeded for low income, asthma, diabetes, heart disease, low life expectancy, lead paint, proximity to Superfund sites, and educational attainment² (CTs 3087050300 [CT503] and CT39087050100 [CT501]). Ironton is a rivertown; however, the riverfront is entirely occupied by blighted brownfield properties; The Corridor falls almost entirely within the 100-year floodplain. With the mix of larger scale properties along the river and the density of properties along 3rd Street, coupled with the availability of existing infrastructure, environmental assessment of properties in this area can springboard reinvestment and revitalization of the area and connect these parts of Ironton to the Central Business District (CBD).

LEDC focus is on providing business development, innovation, and seeking partnerships around the world to not only bolster the economic fortunes of Southern Ohio, but also to build a better standard of living for our communities. With access to every key mode of transportation – river, road, rail, and air – the County's location gives businesses a strategic and competitive advantage, allowing them to grow and prosper. LEDC

¹Census.gov, 2021: American Community Survey 1-Year Estimates Data Profiles.

² Climate and Economic Justice Screening Tool.

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

has a proven track record of revitalizing large industrial brownfields and putting them back into productive, economic reuse. Examples include: The Point: "South Point's Industrial Park on the Ohio River" which is a 500+ acre former Superfund site that is now ready for reuse. Another is "Southern Ohio's Industrial District" (The District) in Hanging Rock, which is a large brownfield-turned-industrial park and was the result of a joint venture between JobsOhio and LEDC which brought together 400 acres of land that is being revitalized with industrial investment. The jobs already created at The Point and The District are crucially important to the economically distressed residents in the area. With more assessment resources and LEDC's demonstrated redevelopment expertise, we will create a similar economic engine at The Corridor in Ironton.

(ii) **Description of the Priority Brownfield Sites:** As noted above, The Corridor was heavily industrialized and was long the epicenter of industry in the County. Some industry included the New York and Ohio Iron and Steel Works in the north, Kelly Nail & Iron Co. in central Ironton, The Dayton Malleable Iron Co. in southern Ironton, and the Priority Site, the former **Former Wilson Glove Building** located at 1603 S 3rd Street. The multi-story structure was constructed in the mid-1920s by the Selby Shoe Company for manufacturing purposes. Wilson Athletic Goods purchased the site in the mid-1940s and manufactured sporting goods equipment, and later furniture, until the mid-1980s. Since then, the site was acquired by private ownership and has fallen into disrepair. Given its prominent location, size (nearly 2.5 acres), and close proximity to residential neighbors, the community would greatly benefit from its revitalization. The intent is to conduct environmental assessments and prepare cleanup planning documents to entice potential investors in reviving this prime site. Its redevelopment is especially critical as it lies at the southern entrance to the CBD, and its revitalization will leverage additional improvements in the downtown area.

The second Priority Site in The Corridor is located at 1214 S 2nd Street in Ironton, which is situated in a disadvantaged census tract (CT503). This site was utilized as **The Ironton Machine Shop** as early as 1904 through at least the 1960s and was surrounded by industrial properties, a rail line, and residential properties. This machine shop played a crucial role in the industrial landscape of Ironton given its adjacency to rail lines and proximity to several foundries. This 0.85-acre site is situated on a full city block that has been underutilized for decades and is ripe for reinvestment. With this grant, we will conduct environmental assessments and prepare cleanup planning documents for this site to facilitate potential investors in redeveloping this prime site. Several national chain retail companies have expressed interest in the area recently; however, the negative stigma of the brownfields in the area are proving to be a barrier to investment. Alternatively, the site could be redeveloped into several smaller commercial spaces that are a need in the market or mixed-use retail/residential.

(iii) **Identifying Additional Sites:** Community outreach is an important component to the success of this type of grant project to ensure use of the funds in a manner supported by the community. We will incorporate brownfields education and outreach at scheduled public meetings. Brownfield inventorying is a dynamic process and LEDC will work with community stakeholders to develop a prioritization matrix. 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. Prioritization of sites will continue throughout the term of the grant as projects are selected to receive assessment activities and cleanup planning resources.

b. Revitalization of the Target Area

(i) Reuse Strategy and Alignment with Revitalization Plans:

The City of Ironton's CBD is situated in the disadvantaged CT503. The most recent CBD Plan incorporates a vision, purpose and scope that emphasizes: 1) a downtown community that is clean, convenient, safe and a fun place in which to shop, work, live and play, 2) development that capitalizes on unique Rivertown attributes such as juxtaposition of water and land transportation methods, 3) preservation of historical structures with industrial legacy to be included in preservation to the extent feasible, and 4) revitalization following the four forces of real estate value: political, physical, economic and social. Participants in creating the plan included business leaders, community leaders, and residents.

Once Priority Sites have been assessed using grant funds and, if required, remediated and/or mitigated, LEDC will market them aggressively and effectively, similarly to The Point and The District, with customized incentives tailored to job creation and real estate tax revenue enhancement. With **60% of the U.S. population, 80% of U.S. corporate headquarters and 61% of U.S. manufacturing capacity within a day's drive**, coupled with its many modes of existing transportation infrastructure (river, road, rail, and air), the County has a compelling story to tell in marketing its developable land to new industry.

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

(ii) Outcomes and Benefits of Reuse Strategy: Two of the three CTs in The Corridor are identified as disadvantaged with excessive burden and socioeconomic thresholds. Using this grant to remove the stigma of actual or suspected environmental contamination from the Priority Sites and other brownfields that lie in these disadvantaged areas, they can blossom with new investment, jobs, and recreational space.

Assessment of The Corridor Target Area will not only help revitalize the multitude of blighted properties, it will aim to support the community's desire for a bicycle/pedestrian-friendly corridor along S 3rd Street in Ironton and the Oakley Clark Collins Bridge which would further connect the community to neighboring Kentucky. Additionally, revitalization of The Corridor will help create community access to the riverfront that is currently hindered by an abundance of blighted brownfields. This will be modeled after the recent success of the Big Four Bridge that connects Louisville, Kentucky's Waterfront Park with a downtown restaurant and business district in Jeffersonville, Indiana³. It's estimated that the park has 2.2 million visitors per year³.

LEDC's proven approach to redevelopment and marketing of brownfield sites (e.g., The Point and The District) will be employed at The Corridor to attract new business and jobs to the County. This will also be extended to other sites as they are identified and assessed through the grant period. Although many communities can produce creative literature to describe their plans for economic stimulation and revitalization, **LEDC and community stakeholders have a demonstrated, objective track record proving their competency and expertise in leveraging a variety of funding sources and bringing tangible redevelopment results to the community.**

c. Strategy for Leveraging Resources

(i) Resources Needed for Site Reuse: Consistent with the CBD Plan and its recognition of the importance of unique rivertown resources and assets, LEDC has obtained Foreign Trade Zone status for The Point industrial park, affording its businesses a competitive advantage. Similar status is planned for The District and the former Ironton Steel located within The Corridor, and may be sought for other brownfield redevelopments as appropriate to secure tenants and/or purchasers with job-creating end uses. Other incentives provided by the County include grants for infrastructure and partial real estate tax abatements. These County incentives are complemented by state incentive packages through JobsOhio or the Ohio Department of Development (ODOD), including low-interest loans, training grants, access road support, job creation tax credits, and brownfield cleanup grants.

Ohio has several State grants to support **brownfield cleanup** and revitalization. ODOD, through its Brownfield Remediation Program, offers cleanup grants. Petroleum brownfield sites in Ohio can be remediated using ODOD's Abandoned Gas Station Grant. The Ohio EPA's Site Assistance and Brownfield Revitalization (SABR) division offers multiple grant-funded programs including Technical Assistance (TA) for the Voluntary Action Program (VAP). LEDC works closely with JobsOhio who maintains a Revitalization Program Loan and Grant Fund that provides moneys for assessment and cleanup of selected Brownfield sites, with a high priority placed on projects that support *near term* job creation opportunities for Ohioans.

In summary, this grant will provide strategic assessments **to complement the tactical cleanup and infrastructure funding available from ODOD, Ohio EPA, and JobsOhio.**

(ii) Use of Existing Infrastructure: the County has access to every key mode of transportation – river, road, rail, and air. The Ohio River adjoins The Corridor Target Area and rail traverses its length. US Route 52, which in many stretches meets Interstate Highway design criteria, is accessible by numerous exit ramps within ½-mile of The Corridor Target Area. Three airports are located less than 10 miles from the Target Area. The Target Area/Priority Sites have excellent access to existing utilities. All sites have access to electricity, natural gas, sewer, and water. LEDC does not anticipate the need for additional infrastructure improvements in the Target Area beyond the standard tie-ins for new construction. Water availability throughout the Target Area is ample to support industrial and commercial growth. Between the two major water utilities in the area, capacity is 7.2 million gallons per day (MGD), while average consumption currently is 3.58 MGD – less than 50% of capacity. The County and the AEP Ohio grid are well-positioned with respect to current electric power use and capacity, which will be enhanced by several new nearby generating facilities. Finally, in regard to natural gas, distribution systems in the County were designed to satisfy the demanding fuel gas requirements

³ <https://www.courier-journal.com/story/news/local/2023/02/10/big-four-bridge-pedestrian-bridge-louisville-jeffersonville-fun-facts/69887883007/#SnippetTab>

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

of the iron foundry industry, and that now largely-unused capacity remains available throughout the project area so that fuel supply will not constrain future industrial development.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

(i) The Community's Need for Funding: the County, with a 2021 population of 58,570, is a small county in Appalachian Ohio. Two of the three CTs in The Corridor are identified as disadvantaged with excessive burden and socioeconomic thresholds, including low income. Median household income in the County is \$48,947, 23% below Ohio and 34% below national medians⁴. Additionally, the unfortunate economic state of the County is further exemplified by 18.8% of incomes falling below the poverty rate; the state and national averages are 13.4% and 12.6%, respectively⁵.

Although the unemployment rate for the County is on par with the state and national average (~5.3%), the annual mean wage for jobs in the area is 21% lower than the national average⁶. Several CTs have higher unemployment rates, including two in The Corridor with rates of 6.2% and 9.7%⁷. Additionally, the County is losing residents (>6% decrease since 2010⁸). Although we do not know if these are directly related issues, but coupled with the statistics in section 2a.(ii), they are all likely contributing factors. Using this grant to remove the stigma of environmental issues associated with brownfields will aid in attracting new economic investment, development, jobs, and revitalization in the Target Area and the County as a whole.

(ii) Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations: Almost 34% of children in the County live in poverty, compared to the state rate of 21%⁵. Given the proximity of low-income households to the brownfields in The Corridor Target Area, childhood exposure to contamination is likely a contributing factor to the overall poor health in the County. Coupling that with low household income, upward mobility for many of these families is likely very difficult; consequently, we intend to address legacy environmental hazards in the The Corridor target area to give residents a safer, healthy community to age in place.

Greater Than Normal Incidence of Disease and Adverse Health Conditions: Although data are not available for health-related metrics on a Target Area basis, the County is broadly ranked near the bottom (81st of the 88 counties) in Ohio for health outcomes and length of life (81st); the premature death rate is double that of the national average and 31% higher than the state⁹.

From 2016-2020, the County incident rates for the following were higher than both the state and national averages: cancer, lung cancer, breast cancer, leukemia, poor physical health days, physical inactivity, adult obesity, premature death rate, and teen birth rate. It could be argued that many of these are due to legacy environmental issues from the former heavy industry in the County.

Ohio is ranked 47th in the US on health value¹⁰, and the County ranks 81st out of 88 counties for health outcomes and factors⁸; this is likely correlated with limited physical activity (the County rate is 22% higher than the state rate⁹). Currently, the infrastructure for a more-active lifestyle is lacking and limited access to locations for physical activity (the County rate is 66% lower than the state and 69% lower than the national rate⁹). Assessment of the The Corridor Target Area will support the community's desire for greenspace and a bicycle/pedestrian-friendly corridor along the Ohio River and S 3rd Street in Ironton and will help create access to the riverfront that is currently hindered by blighted brownfields¹¹.

(2) Environmental Justice:

(a) Identification of Environmental Justice Issues: EPA's CEJST identifies two of the CTs (CT501 and CT503) in The Corridor Target Area as disadvantaged. Both CTs exceed burden and socioeconomic

⁴https://data.census.gov/table?q=dp03&g=040XX00US39_050XX00US39087_1400000US39087050100,39087050200,39087050300_160XX00US3937464&y=2021

⁵https://data.census.gov/table/ACSDP5Y2021.DP03?q=dp03&g=010XX00US_040XX00US18_050XX00US18007,18015,18027,18073,18111,18131,18149,18177,18181&y=2021

⁶ https://www.bls.gov/oes/current/oes_3900004.htm

⁷ <https://www.census.gov/quickfacts/fact/table/lawrencecountyohio/PST120218>

⁸ County Trends | Development (ohio.gov)

⁹ <http://www.countyhealthrankings.org/app/ohio/2016/rankings/lawrence/county/factors/overall/snapshot>

¹⁰ Archived: 2021 Health Value Dashboard™ - Health Policy Institute of Ohio (healthpolicyohio.org)

¹¹ Activate Ironton, Ironton Bicycle and Pedestrian Master Plan, Burton Planning Services, April 2018

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

thresholds for diabetes, heart disease, proximity to Superfund sites, and educational attainment. Additionally, CT503 (the CT where The Ironton Machine Shop is situated) exceeds the thresholds for low income, low life expectancy, asthma, and lead paint likely to be in homes.

The CT (CT 39087050200; CT502) where the Former Wilson Glove Site is situated is not identified as disadvantaged; however, thresholds were exceeded for low life expectancy, proximity to Superfund sites, lack of indoor plumbing, and lead paint,. Low income in this CT ranked 63rd, which does not exceed the 65th percentile threshold; however, if it did, the CT would be characterized as disadvantaged.

Additionally, EPA's CEJST indicate the following environmental justice indexes: a portion of CT503 is in the 80% for air toxics cancer risk and the entire CT is in the 92% for asthma and CT501 is in the 99% for heart disease and 97% for cancer rate among adults. Additionally, The Corridor falls almost entirely within the 100-year floodplain.

(b) Advancing Environmental Justice: LEDC will utilize this assessment grant to facilitate data collection to further identify environmental disparities and injustices in The Corridor and the County. Assessment focus will be on health and safety of disadvantaged areas and populations and revitalizing brownfields. This data can help advocate for change/cleanup 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 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, flood protection). The Corridor is also a target area for Ironton in Bloom who intends to reestablish an urban tree canopy.

LEDC will be empowered through the strategic funding of this grant project to provide employment opportunities and healthy, active lifestyle infrastructure for the economically disadvantaged and impoverished CTs targeted for this grant project and throughout the County.

b. Community Engagement

(i) Project Involvement and (ii) Project Roles: The partners listed below represent over 50 additional entities who will be engaged in community outreach, economic development, and eligible grant activities.

Partner Name	Point of contact (name, email & phone)	Specific role in the project
City of Ironton	Mayor Sam Cramblit (740) 532-3833 mayorassist@ironton-ohio.com	Support prioritization of assessment activities at The Corridor; interface with general public; outreach and information support.
Lawrence County Chamber of Commerce	Bill Dingus Executive Director (740) 377-4550 dingus@ohio.edu	Outreach to business community (existing and potential) on availability of grant funds and educate on cleanup and redevelopment potential of brownfield sites.
Ironton-Lawrence County Community Action Organization (ILCAO)	Ralph Kline (740) 532-3140 rkline@ilcao.org	Community engagement, outreach, local information support, and assistance in identifying and securing leverage funding for cleanup throughout the County.
Lawrence County Commissioners	DeAnna Holliday (740) 533-4300 dholliday@lawrencegov.org	Interface with general public; outreach and information support through the County Commissioners' Facebook page.
OhioMeansJobs-Lawrence County	Jewell K. Hackworth Director (740) 532-3140 [REDACTED]	Support site reuse by interfacing with employers and job seekers, and on opportunities for development and/or employment in Target Areas/Priority Sites and the entire County.
Ironton aLive	Sam Heighton (740) 532-2269 samheighton@irontonalive.com	Established in 2013, Ironton aLive is a downtown revitalization non-profit that assists with increasing downtown economic development.

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

Input into the most recent CBD plan was provided by, among others, the Greater Lawrence County Area Convention and Visitors Bureau (CVB) the Friends of Ironton (Friends), Ironton aLive, and Ironton in Bloom. These entities will also be engaged in the grant project in addition to the specific involvement outlined above. Additional stakeholders that will utilize this grant to encourage economic investment and jobs include the Lawrence County Port Authority, OhioSE, Ohio Valley Regional Development Commission, and the Kentucky-Ohio-West Virginia Interstate Planning Commission.

(iii) Incorporating Community Input: LEDC is committed to an open and active public outreach effort to support the grant project. We will seek input from the community as to their concerns relative to brownfield sites, sites that the public wishes to have assessed in addition to the Target Areas, and provide general information on the project and on area brownfields. Solicitation of public input will be initiated with a public information meeting in the Target Area. Announcements publicizing the meeting(s) will be published in the local daily newspaper the Ironton Tribune, along with notices on LEDC's and community stakeholder (e.g., ILCAO) websites. Media kits will also be prepared and distributed to television/radio outlets that serve the County. Finally, an executive summary presentation of the grant project goals, work plan and budget breakdown will be made to the Lawrence County Commission at their regularly scheduled meetings, at which input will also be sought from commission and council members and the general public. Meetings of these legislative entities are broadcast live on their Facebook pages, providing the public ongoing opportunities to educate themselves on the progress of the grant project. Following the public meeting(s), outreach will continue via the websites, coupled with PSAs distributed to the media outlets serving the County.

Gathering strong community input at the commencement of the grant implementation is crucial in order to maximize its influence. The intention will be to identify a common goal(s) that resonates with the community, then the assessment grant will be evaluated in hopes it can help springboard the desires to fruition (e.g., recreational path, riverfront park, etc.). Routine public input forums will be held (and online surveys sent) to maintain a direct connection with the community to continue gathering thoughts and ideas in addition to feedback on implementation.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs: Our plan is to use the grant to assess at least 20 sites, including Priority Sites in the Target Area and other high-risk or developable sites identified during the grant period to support redevelopment of these brownfields. To accomplish this plan, we have identified the following five tasks that will be implemented as part of the grant project. Tasks 1-3 are associated with overall grant operations, while Tasks 4 and 5 apply directly to Priority Sites and other sites identified during the grant.

Task 1 – Programmatic

i. Project Implementation

- The Work Plan will be prepared.
- The Cooperative Agreement (CA) will be executed.
- A Qualified Environmental Professional (QEP) will be retained in compliance with applicable federal procurement regulations.
- A project “kick-off” meeting will be hosted by LEDC and QEP.
- LEDC will complete all required quarterly reports; the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) will be updated; and final project closeout documentation will be submitted.
- Staff will attend brownfields training programs.

ii. Anticipated Project Schedule

- The Work Plan will be prepared within one month of receiving notification of the grant award.
- The CA will be executed within three months of award.
- A QEP will be retained within three months of award.
- Quarterly reports will be submitted within 30 days of the end of the quarterly reporting period and ACRES will be updated as Priority and non-Priority Sites are assessed. ACRES will subsequently be updated with cleanup and/or redevelopment information during and/or after the performance period. Final project closeout documentation will be submitted as required once the performance period ends.
- A “kick-off” meeting will be held within 2 months of receiving notification of the award.

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

<p><i>iii. Task/Activity Lead</i></p> <p>LEDC will lead the day-to-day coordination of grant activities, required performance reporting, and ongoing training of staff.</p>
<p><i>iv. Outputs</i></p> <p>Satisfaction of administrative requirements of the grant including the Work Plan, CA, quarterly reports (16); ACRES updates; staff training; public meetings and development of outreach materials; final project closeout documentation.</p>
<p>Task 2 – Community Outreach</p>
<p><i>i. Project Implementation</i></p> <ul style="list-style-type: none">Community outreach and education at public meetings.Correspondence with community stakeholders about assessments will be ongoing.Assistance will be requested from the County health department as appropriate throughout the grant period to understand and prioritize health risks at brownfield sites identified for assessment.LEDC efforts will be conducted as in-kind services.
<p><i>ii. Anticipated Project Schedule</i></p> <ul style="list-style-type: none">An initial public information and input meeting within two months of notification of award.Community outreach activities will continue throughout the performance period.
<p><i>iii. Task/Activity Lead</i></p> <p>LEDC will coordinate/conduct community meetings and community outreach activities in conjunction with the QEP. Frequency of the meetings will be determined based on community engagement.</p>
<p><i>iv. Outputs</i></p> <p>Facebook and website posts, fact sheets, meeting minutes and, more generally, effective communication to the public and stakeholders regarding the objectives and progress of the project.</p>
<p>Task 3 – Site Inventory</p>
<p><i>i. Project Implementation</i></p> <ul style="list-style-type: none">A selection system for assessments will be developed to identify and prioritize sites in addition to the priority sites based on: 1) sites where evident threat to public welfare or the environment exists; 2) sites with real development/job creation potential; and 3) sites identified and prioritized by the community.Non-Priority Sites will be added to the inventory.In-kind staff time and travel will be contributed for amounts over those accounted for in 3.b.
<p><i>ii. Anticipated Project Schedule</i></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.
<p><i>iii. Task/Activity Lead</i></p> <p>LEDC will be the lead and work with the QEP to update and maintain an inventory of brownfield sites.</p>
<p><i>iv. Outputs</i></p> <p>A more complete and comprehensive inventory of Brownfield sites in the County.</p>
<p>Task 4 – Site Assessment</p>
<p><i>i. Project Implementation</i></p> <ul style="list-style-type: none">The selected QEP will prepare a Quality Assurance Project Plan (QAPP) and submit it to the EPA.Priority Sites and additional sites identified during the grant period will be evaluated through performance of Phase I and/or Phase II ESAs, conducted in accordance with All Appropriate Inquiry (ASTM Standard E1527-21) or Ohio EPA Voluntary Action Program (VAP) protocols. Hazardous Materials Assessments will also be conducted. Health & Safety Plans (HASPs) will be prepared prior to each assessment.Assessments on both priority and other sites following securing site access will continue.LEDC and QEP will meet to ensure required site access has been secured, individual assessments are progressing, and the overall project schedule is met.LEDC efforts will be conducted as in-kind services.

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

ii. Anticipated Project Schedule

- Phase I and/or Phase II assessments will continue throughout the performance period.
- Phase II assessments will begin after submission/approval of the QAPP; within three months of QEP selection and grant start date.
- Assessments on both priority and other sites following securing site access will continue throughout the performance period.
- LEDC and QEP will meet monthly, or as needed, to ensure required site access have been secured, individual projects are progressing, and the overall project schedule is met.

iii. Task/Activity Lead

The QEP will lead this task.

iv. Outputs

QAPP, 20 site eligibility determinations, 20 health-and-safety plans (HASPs), 20 Phase I ESA reports, 10 site-specific sampling and analysis plans (SAPs), 10 Phase II ESA reports.

Task 5 – Cleanup Planning

i. Project Implementation

- Cleanup/redevelopment planning as required by various state of Ohio programs for sites where redevelopment is imminent. Assessment of brownfields cleanup/redevelopment alternatives, evaluation of needed institutional and engineering controls, and preparation of cleanup and reuse plans.

ii. Anticipated Project Schedule

Cleanup planning will be conducted at Priority Sites and other sites following completion of the associated assessment activities and will continue throughout the performance period.

iii. Task/Activity Lead

The QEP will lead this task.

iv. Outputs

Based on the Site Assessments, outputs for this task include at least 5 cleanup planning documents (e.g., remedial action plans, risk assessments, evaluation of institutional/engineering controls).

b. Cost Estimates

Task 1 Programmatic: Programmatic costs are \$17,500. LEDC labor costs of \$5,000 (100 hours at \$50/hour) are included for programmatic activities. Contractual costs include \$7,500 for updating/maintaining brownfields information in ACRES, grant management consulting, and assisting with quarterly reporting. The grant also includes costs for LEDC attendance at one National Brownfields Conference and an additional brownfield conference (2 trips at \$2,500/trip).

Task 2 Community Outreach: Community outreach costs are \$5,000. LEDC efforts will be conducted as in-kind services. Included is \$500 for printing and shipping project information and documents to citizens and community stakeholders. Contractual costs of \$4,500 will include QEP support in education of community stakeholders and interested parties.

Task 3 Site Inventory: We have included \$12,500 in the budget for inventory development and maintenance costs, which includes grantee personnel costs of \$1,500 (30 hours at \$50/hr) and travel costs of \$1,000 for identifying and confirming new sites and showing sites to interested parties. The QEP will assist in compiling the inventory list, and potential interactive database, throughout the project at a cost of \$10,000. Output for this task will be a more complete and comprehensive inventory of Brownfield sites in the County.

Task 4 Site Assessment: The majority of the site assessment task budget will be used to conduct ESAs. The costs for completing Phase I and Phase II ESAs will vary depending on the complexity of each site and whether VAP compliance is required. Based on past experience, we estimate Phase I ESAs will cost \$3,000 to \$6,000, VAP Phase I ESAs will cost \$7,000 to \$9,000, and Phase II ESAs will cost \$25,000 to \$60,000 (including the SAPs). The grant budget includes contractual costs of \$428,500 including a QAPP at an estimated cost of \$6,000; 20 Phase I ESAs at \$5,000 each (\$100,000 total), and 10 Phase II ESAs, including site-specific HASPs and SAPs, at \$32,250 each (\$322,500 total). On average, Phase I ESAs will take ~4 weeks and Phase II ESAs will take ~6 weeks. These are average costs and timelines used for budgeting; actual costs and timelines will vary. Assessment of the Target Area/Priority Sites will be the focus to address

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

environmental issues in the economically disadvantaged and impoverished CTs targeted for this grant to be protective of human health and the environment and promote investment and redevelopment.

Task 5 Cleanup Planning: We have included \$36,500 in the budget cleanup planning. Contractual costs for this task are estimated at \$35,000 based on completing five remedial action plans and/or risk assessments at \$7,000 each. LEDC personnel costs are estimated at \$1,500 (30 hours at \$50/hr) and will be expended in identifying land use scenarios appropriate to the intended redevelopment use of sites (i.e., residential, recreational, or commercial).

Budget Table

Budget Categories	Project Tasks (\$)					Total
	Task 1 Programmatic	Task 2 Community Outreach	Task 3 Site Inventory	Task 4 Site Assessments	Task 5 Cleanup Planning	
Personnel	\$5,000		\$1,500		\$1,500	\$8,000
Travel	\$5,000		\$1,000			\$6,000
Supplies		\$500				\$500
Contractual	\$7,500	\$4,500	\$10,000	\$428,500	\$35,000	\$485,500
Total	\$17,500	\$5,000	\$12,500	\$428,500	\$36,500	\$500,000

c. Plan to Measure and Evaluate Environmental Progress and Results

LEDC will diligently track, measure, and report on the success of the project utilizing ACRES to track the following outputs: number of Phase I and II ESAs completed and number of cleanup planning documents. The actual outputs will be compared to the estimated number of outputs listed in Section 3.b. Additionally, we will track, measure, and report the following outcomes in ACRES: 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. LEDC will report outcomes/outputs that cannot be easily entered into ACRES (i.e., website updates, staff training, community outreach/meetings, and brownfields) in quarterly reports. LEDC will also evaluate the extent to which site assessments, cleanup planning, and future redevelopment result in the protection of human health and the environment. We will evaluate the project progress semi-annually against the goals in Section 3.b and, if goals are not being met or are off-schedule, will meet with local stakeholders and the QEP to discuss the shortcomings and adjust the project approach and schedule, as needed.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

(i) Organizational Capacity, (ii) Organizational Structure, and (iii) Description of Key Staff:

LEDC is a non-profit Community Improvement Corporation (CIC) formed under Chapter 1724, Ohio Revised Code and organized under Section 501(c)(3) of the Internal Revenue Code. It was formed in 1983 and was designated the economic development agent for the City of Ironton and Lawrence County. The goal of the agency is job creation and retention as well as to provide assistance in community enhancement projects such as the construction of parks and community centers throughout the County to help the citizens of the County. LEDC is the lead agency for the Intermodal River Port Facility project and the owner of The Point Industrial Park. We collaborate closely with state and local officials in Ohio, Kentucky, and West Virginia on this and many other projects.

LEDC administers a city and County-wide revolving loan fund, as well as a Regional revolving loan fund which supports economic development projects in the area. Its experience with environmentally challenged properties began with its effective administration of the EPA Superfund Redevelopment Initiative Program grant awarded in 2002 to spur redevelopment at the South Point Superfund site, and has continued with its state grant and loan administration most recently through JobsOhio. LEDC is directed by a Board of Trustees composed of local elected officials and local business leaders. LEDC is also in charge of marketing,

NARRATIVE/RANKING CRITERIA FOR LAWRENCE COUNTY ASSESSMENT GRANT

construction of infrastructure, and development of The Point Industrial Park at the South Point Superfund site and The District in Hanging Rock.

Although this will not be a coalition grant, the Lawrence County Port Authority (Port) and ILCAO will be integral in maximizing the economic impact of the grant. The Port is a partnership of governmental organizations organized by resolution of the Lawrence County Commissioners and is a quasi-governmental entity per Ohio Revised Code Chapter 4582. Its service area is the County, and it has forged a long term relationship between LEDC and ILCAO to provide a vehicle to implement programs most appropriate to a port authority. ILCAO is a Community Action Organization established in 1965 and organized under Section 501(c)(3) of the Internal Revenue Code. It carries out the Community Action Program (CAP), which was founded by the 1964 Economic Opportunity Act to fight poverty by empowering the poor as part of the War on Poverty. Its mission is to “**measurably improve the well-being of the residents of Lawrence County, Ohio by providing opportunities for those in need.**” Programs administered by ILCAO include Community Services Block Grants (CSBG), Community Development Block Grants (CDBG), Family Medical Centers, Workforce Development, and Child Development within the ILCAO service area, Home Energy Assistance Program (HEAP), affordable housing projects and many other programs aimed at improving the lives of less fortunate citizens of the County.

Mr. Jeremy Clay, Associate Executive Director of LEDC, will be the project manager and main point of contact for EPA. Mr. Clay has an engineering background and has extensive experience in developing and constructing industrial property within the The Point, The District, The Corridor, and throughout the County. He will work alongside EPA, community stakeholders, and the QEP on all facets of the grant.

Dr. Bill Dingus, PhD., Executive Director of LEDC (and the Port), will serve as the Chief Executive. He will work closely with Mr. Clay and the remaining team to ensure requisite grant compliance. Dr. Dingus and his LEDC organization have many years of experience in identifying and recruiting new and expanding industry in the area, which is key to developing viable re-use of sites assessed through this grant.

Mr. Jesse Layne, Chief Financial Officer of LEDC, will serve as fiscal manager for the grant. He will oversee all day-to-day procurement, grant financial management, including all draws, payments, and reporting to EPA.

Mr. Ralph Kline, of ILCAO, has nearly 40 years of grant management and community development experience for both the County and the City of Ironton. Mr. Kline oversees a community development staff that are certified in Business Development Financing and he will continue his service as a consultant and advisor to LEDC to bring together financing and resources to assure these funds will provide the most economic and environmental impact to the County. Mr Kline's efforts will be conducted as in-kind services.

(iv) Acquiring Additional Resources: Using a Qualifications-Based Selection Process that complies with federal procurement regulations (40 CFR §31.36 and 2 CFR §200.318), LEDC will retain a highly competent QEP to conduct the assessments and assist with project tracking.

b. Past Performance and Accomplishments

(i) Currently Has or Previously Received an EPA Brownfields Grant:

(1) Accomplishments: Using our FY20 Brownfield Assessment Grant, 21 sites have been assessed resulting in the following outputs: 29 assessments completed (compared to the baseline measurement of 15), assessment of ~110 acres of brownfields (baseline was 10), cleanup of these brownfields with \$250,000 in leveraged funding from ODOD, and creation of 22 jobs (baseline was 5). These outputs and outcomes were reported in ACRES.

Also, we will continue leveraging assessment work conducted under our FY20 grant into additional brownfield cleanup funding from ODOD during 2024-25.

(1) Compliance with Grant Requirements: LEDC developed a Work Plan and successfully negotiated a Cooperative Agreement with the EPA for the FY20 grant. We complied with the Work Plan and their associated schedules, terms, and conditions. A QAPP was prepared for the grant. Quarterly reporting, annual financial status reporting, and site information and assessment data for the grant was submitted via ACRES.

The FY20 grant started in October 2020 and ended in September 2023. As of October 1, 2023, we had drawn down \$436,402.83 (~72%) of the FY20 grant. As of the date of this application, we have drawn down \$593,044.37 (~98%) and expect to draw down the full grant with \$0.00 remaining by December 2023.

THRESHOLD CRITERIA

THRESHOLD CRITERIA
LAWRENCE ECONOMIC DEVELOPMENT CORPORATION
FY24 U.S. EPA BROWNFIELD ASSESSMENT GRANT APPLICATION

THRESHOLD CRITERIA

1. **Applicant Eligibility:** The Lawrence Economic Development Corporation (LEDC) is a non-profit Community Improvement Corporation (CIC) formed under Chapter 1724, Ohio Revised Code and organized under Section 501(c)(3) of the Internal Revenue Code. Documentation of the 501(c)(3) status of LEDC is attached.
2. **Community Involvement:** LEDC was formed in 1983 and was designated the economic development agent for the City of Ironton and Lawrence County. The goal of the agency is job creation and retention as well as to provide assistance in community enhancement projects such as the construction of parks and community centers throughout the county to help the citizens of Lawrence County.

The main stakeholders in this grant project will be Lawrence County citizens and employees, employer companies, business organizations, lenders and developers. The partners listed below represent over 50 additional entities who will be engaged in community outreach, economic development, and eligible grant activities.

Partner Name	Point of contact (name, email & phone)	Specific role in the project
City of Ironton	Mayor Sam Cramblit (740) 532-3833 mayorassist@ironton-ohio.com	Support prioritization of assessment activities at The Corridor; interface with general public; outreach and information support.
Lawrence County Chamber of Commerce	Bill Dingus Executive Director (740) 377-4550 dingus@ohio.edu	Outreach to business community (existing and potential) on availability of grant funds and educate on cleanup and redevelopment potential of brownfield sites.
Ironton-Lawrence County Community Action Organization (ILCAO)	Ralph Kline (740) 532-3140 rkline@ilcao.org	Community engagement, outreach, local information support, and assistance in identifying and securing leverage funding for cleanup throughout the County.
Lawrence County Commissioners	DeAnna Holliday (740) 533-4300 dholliday@lawrencegov.org	Interface with general public; outreach and information support through the County Commissioners' Facebook page.
OhioMeansJobs-Lawrence County	Jewell K. Hackworth Director (740) 532-3140 [REDACTED]	Support site reuse by interfacing with employers and job seekers, and on opportunities for development and/or employment in Target Areas/Priority Sites and the entire County.
Ironton aLive	Sam Heighton (740) 532-2269 samheighton@irontonalive.com	Established in 2013, Ironton aLive is a downtown revitalization non-profit that assists with increasing downtown economic development.

Upon grant award, we will issue a press release about the funded initiative in local newspapers throughout our region, to bizjournals.com (publishers of Columbus Business First and Cincinnati Business Courier) and through the Facebook pages of the Lawrence County Commissioners and the City of Ironton, the primary information media used by County residents to stay current on local government actions. Reporting progress to stakeholders will be conducted through the websites of LEDC and the Facebook pages of the County Commissioners and City of Ironton. The quarterly progress report describing grant activities and projects will also be available through a link on the LEDC website. Our community-based organizations and leveraging partners will also be provided quarterly reports and notices of meetings in their service areas to inform and encourage their constituencies to participate. English is our primary language of communication, but translators, sign language interpreters, and translated documents will be made available upon request to assist non-English speaking or hearing-impaired residents. Local dialogue and public input will continue throughout the project.

3. **Expenditure of Assessment Grant Funds:** LEDC was awarded a FY20 U.S. EPA Brownfield Assessment Grant. The grant started in October 2020 and ended in September 2023. As of October 1, 2023, we had drawn down \$436,402.83 (~72.7%) of the FY20 grant. As of the date of this application, we have drawn down \$593,044.37 (98.8%) and expect to draw down the full grant with \$0.00 remaining by December 2023.
4. **Contractors:** N/A. A contractor has not been procured.
5. **Subrecipients:** N/A. LEDC will not utilize a subrecipient.