

CLINTON COUNTY

BOARD OF COMMISSIONERS

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Michael A. Beard

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November 23, 2011

Mr. Don West
Environmental Management Support, Inc.
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Re: FY2012 Brownfields Assessment Grant Proposal
\$200,000 U.S. EPA Hazardous Substances Assessment Grant and
\$200,000 U.S. EPA Petroleum Assessment Grant
Clinton County, Indiana

Dear Mr. West:

Clinton County, Indiana is applying for a U.S. EPA Assessment Grant. Clinton County is submitting the enclosed application for a \$200,000 Community Wide Hazardous Substance Assessment Grant and a \$200,000 Community Wide Petroleum Assessment Grant.

Clinton County (the County) is located in central Indiana, between Indianapolis and Lafayette. Nearly half of the population in the County is centered Frankfort. In the mid 1800s Frankfort became a center for the rail industry and was home to one of the earliest roundhouses in Indiana. With the expansion of rail transportation, Frankfort and the County became the home to various industries that relied on the rail service to move their products and employed thousands of residents, creating a thriving community. In the late 1990s, the roundhouse was closed, thus creating a major brownfield and eyesore in center of the city. On heels of the roundhouse closure, numerous large employers began to close even prior to the current recession and the county has been mired in systemic long-term economic decline. Unemployment and more recently underemployment has caused a spike in poverty rates and a decline in per capita income. The poverty rate for Clinton County is 15.9%, 20% higher than the State of Indiana rate of 13.2% and the City of Frankfort's poverty rate is 17.7%. In addition the per capita income for Clinton County is \$21,067 far below the Indiana average of \$24,044. Frankfort's per capita income (\$17,505) is a staggering 27% less than the state average (*American Community Survey, 2009*). The general downsizing of the manufacturing sector, outsourcing of labor, and plant closures has decimated the once strong economic base of the County and disproportionately impacted the County's impoverished and minority populations. Now acres of vacant industrial plants dominate the landscape, and community leaders are struggling to clean up the environmental fallout and bring employment opportunities back to the County.

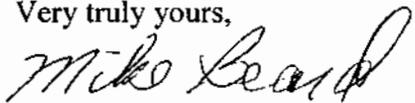
The County is facing the challenge of revitalizing portions of Frankfort where brownfields have disproportionately impacted the health and welfare of minority populations and contaminated area waterways, and addressing deteriorating economic conditions in the smaller communities. The large areas of brownfields and available commercial/industrial space within urban areas of the County are the raw material for sustainable development/redevelopment with mixed-used

developments, high-tech manufacturing, and much needed community amenities. By redeveloping these brownfields, the County hopes to revitalize its urban areas, while maintaining its rural character and abundance of viable farmland. The Assessment Grant will support the key first step towards this managed growth approach, the identification and assessment of brownfields in the urban areas within the County that are impacting the health and welfare of residents and the environment.

The following applicant information is provided as part of the Grant Application:

- a. Applicant Identification: Clinton County
259 East Walnut Street, Frankfort, Indiana 46041
- b. Dun and Bradstreet (DUNS): 831340448
- c. Funding Requested:
 - (i) Grant type: Assessment
 - (ii) Amount: \$400,000
 - (iii) Contamination: \$200,000 Hazardous Substances and \$200,000 Petroleum
 - (iv) Community-wide
- d. Location: Clinton County, Indiana
- e. Not a site-specific proposal
- f. Contacts:
 - (i) **Project Director:** Mr. Shan Sheridan, Economic Development Department
259 East Walnut Street, Frankfort, Indiana 46041
Phone: (765) 654-5507, email: shan@ccinchamber.org
 - (ii) **Highest Ranking Elected Official:** Michael A. Beard
125 Courthouse Square, Frankfort, IN 46041
Phone: (765) 659-6309, email: mbeard@mintel.net
- g. Date Submitted: November 23, 2011
- h. Project Period: Three years
- i. Population: Clinton County: 33,224; (*U.S. Census Bureau 2010*)
- j. Special Considerations: Attached

Very truly yours,



Mr. Mike Beard
President Clinton County Commissioners

Distribution: Ms. Deborah Orr, EPA Region 5 (one photocopy)

**FY 2012 U.S. EPA BROWNFIELDS HAZARDOUS SUBSTANCES AND
PETROLEUM ASSESSMENT GRANT APPLICATION**

CLINTON COUNTY, INDIANA

RANKING CRITERIA FOR ASSESSMENT GRANTS

1. Community Need:

Clinton County (the County) is located between Indianapolis and Lafayette, Indiana, comprising 405 square miles. Frankfort (6.3 square miles) is the county seat and the County has several smaller towns, including Kirklin and Hillisburg. Historically, Clinton County has thrived due to a mix of agricultural, industrial, and rail transportation jobs. Frankfort's railroad history is long and storied, with one of the first railroad roundhouses in Indiana dating back to before 1885. While agricultural farming remains steady, the County residents have struggled with the decline of manufacturing jobs and the negative impact from a decrease in the once thriving rail transportation business. These job-losses have mired the urban areas in a systemic economic crisis, with families struggling to meet their basic needs.

The County desperately needs this grant to improve the economic conditions in the county and recognizes the threats the existing brownfields represent to the most vulnerable citizens living near these sites. The County recognizes that by redeveloping brownfields, they are also protecting the community from urban sprawl, thus helping maintain a stable agricultural economy by preserving undeveloped land. To meet these objectives, the County has made redevelopment of brownfields a top priority. This goal is consistent with the County Comprehensive Plan and is consistent with the citizens' input for the Roundhouse Master Plan (discussed below). The County goals are: embrace "smart growth;" develop a more diverse economy with more high-paying jobs; address unemployment and underemployment; improve the low to moderate income housing conditions and blighted neighborhoods; protect greenspace; and improve/link parks and the city with walking/biking trails. Remarkably, these goals coincide with the U.S. EPA's guiding Livability Principles. Following the desires of the citizens, the County's **Specific Assessment Grant Goals** for this grant are: 1. protecting citizens from direct contact exposures from brownfields, 2. redevelop the roundhouse into a community centerpiece expanding tourism, 3. improve the unacceptable poverty rate by redeveloping brownfields to diversify and create high-paying jobs, 4. revitalize blighted neighborhoods and assess and mitigate unsafe hazards in those areas, and, 5. protect the Wildcat Creek, Prairie Creek, and Sugar Creek watershed ecosystems from impacts from brownfields via uncontrolled runoff and groundwater migration. A majority of the priority sites are within Frankfort, consistent with the fact that 50% of the county population resides in the City. However, because several priority sites in outlying towns represent an imminent threat to life, the County is the applicant to provide assessment to assist smaller communities that do not have the resources available to address these sites, nor the programmatic capability to support an assessment grant.

a. Health, Welfare, and Environment: The cities and towns of Clinton County were constructed at a time when industrial facilities were the focal point of communities. Over 100 years of industrial operations created numerous brownfields and had a cumulative impact to the health and welfare of these communities. With an Assessment Grant, the County can determine the extent of brownfields contamination, control contaminant migration, and protect and improve health and welfare in the communities.

(i) The County has identified over 200 potential brownfields (gasoline stations/automotive repair, former manufactured gas plants, foundries, railroad roundhouse, bulk petroleum plant, machine shops, metal scrap yards, and manufacturing plants) within the County, with the vast majority of these sites a direct threat to impoverished low income and minority neighborhoods and/or either Sugar Creek, Prairie Creek, or Wildcat Creek (Wabash River tributaries). The Clinton County Health Department has identified an additional 41 former drycleaner sites within Frankfort alone. The vast majority of these brownfield and dry cleaner sites have never been assessed. Residents are potentially being exposed to brownfields contaminants via direct



contact, airborne particulates, vapor intrusion, and ingestion. The County desperately needs to enhance its brownfields program, and an Assessment Grant will establish a formal approach to redevelopment of brownfields by providing the required funds to meet the County's **Specific Assessment Grant Goals**. The County's overriding health and welfare concern is the concentration of brownfields in the poor residential neighborhoods of Frankfort and the smaller towns within the County. The Indiana Department of Environmental Management (IDEM) identified over 150 sites of known or suspected environmental contamination (hazardous substances and petroleum products); most located in or around neighborhoods of the urban communities. The overriding health and welfare concerns identified by the County are assessment of five priority brownfield sites due to known risks and redevelopment potential, threats to citizens from hazardous substances, and the environmental threats to the sensitive tributaries to the Wabash River ecosystem. The priority sites are located in close proximity to residential neighborhoods, schools, and/or parks/waterways, and the threat of human exposure to contaminants via direct contact, airborne particulates, and vapor intrusion is intensified. The following table lists the potential health effects associated with the five priority brownfields and the impacted sensitive populations. Demographic data are discussed in Section 1.b.

<u>Site/(Location)</u>	<u>Likely Contaminants</u>	<u>Health Effects¹</u>
Frankfort Westside Redevelopment Initiative (FWRI): Roundhouse, Indiana Brass, salvage yard, Exide Distribution Center, Frankfort Petroleum, auto salvage: 125 acres (Census Tract 9508)	Organic solvents, metals, cyanides, polycyclic hydrocarbons (PAHs), volatile organic compounds (VOCs)	Headaches, poor coordination, respiratory problems, liver/kidney damage, nerve damage
Former Exide Battery Manufacturing Site (Exide): 17 acres (Frankfort – Census Tract 9506)	VOCs, metals, organic solvents, lead, PAHs, sulfuric acids	Respiratory problems, anemia/bone marrow problems, nerve damage, liver/kidney damage
Former Nidec Manufacturing Plant: 38 acres (Frankfort – adjoins Census Tract 9506)	Metals, organic solvents, VOCs, PAHs, polychlorinated biphenyls (PCBs)	Acne/skin irritation, respiratory problems, blood vessel damage, headaches, poor coordination, respiratory problems, liver/kidney damage, nerve damage
Kirklin Auto Repair/Salvage: 2 acres (town of Kirklin)	Mercury, heavy metals, VOCs, lead, PAHs, and chlorinated solvents	Respiratory problems and failure, anemia/bone marrow problems, nerve damage, liver/kidney damage
Hillisburg Hardware/Tractor: <2 acres (town of Hillisburg)	VOCs, PAHs, asbestos	Headaches, confusion, nausea, liver/kidney damage, nerve damage, respiratory damage, lung cancer

¹ Agency for Toxic Substances and Disease Registry (ATSDR), ToxFAQs.

These brownfields, located close to residences, schools, and/or parks, are negatively impacting sensitive populations by potentially exposing them to numerous contaminants via direct contact, airborne particulates inhalation, and vapor intrusion pathways. Lung and bronchus cancer incidence rate (cases per 100,000 population per year) for the County (71.1) are higher than the similar rates for the U.S. (67.9) and leukemia cases in Clinton County are 18.7 the highest in the State of Indiana exceeding the state average of 12.1 by 154% and the U.S. average of 12.4 by 151%. (*State Cancer Profiles, Incidence Rate Report for Indiana by County, 2004-2008*). These elevated incidence rates indicate that residents in the County have likely been impacted by both brownfields and current industrial operations. Asthma prevalence rates for the County have been estimated based on state and national rates and not on actual County data; therefore, the rates of asthma for the sensitive populations in the County are unknown. However, the Indiana State Department of Health found that asthma prevalence in Indiana is higher among adult females, African Americans, Hispanics, and adults with an annual household income less than \$15,000



(*The Burden of Asthma in Indiana, Second Edition, 2011*). This demonstrates that there is likely a disproportionate impact from pollutants associated with industrial operations and brownfields to minority and low-income residents in the County. The May 2005 report, "A Health Needs Assessment Study of the Minority Population in Clinton County" prepared by the Indiana Minority Health Coalition concluded: "Hispanics in Clinton County are disproportionately affected when comparing the health indicators among ethnic groups." The report indicated that lack of health insurance and income disparities were the leading factors.

Two of the listed priority sites, the **Kirklin Auto Repair/Salvage** and **Hillisburg Hardware/Tractor** sites are priorities because they are an imminent threat to health and life. The abandoned **Kirklin Auto Repair/Salvage** site, located in the town of Kirklin is considered an immediate threat to life and environment. The County identified this site as a priority after several middle school students at a bus stop acquired mercury-containing equipment left in an unsecured location in October 2011. The equipment was damaged and subsequently contaminated the Clinton Central Corporation Middle School, a school bus, and multiple student residences. It is estimated decontamination of the school and bus will exceed \$200,000. The County desperately needs the assessment grant to determine the nature and extent of impact from the storage/potential use of materials at this site, and also assess the impact from existing underground storage tanks (USTs) and years of automobile service. The Kirklin Auto Repair/Salvage site is located in a residential neighborhood and adjoins a mobile home park and is located within 600 feet of the Kirklin municipal water well.

The **Hillisburg Hardware/Tractor** site is located in the unincorporated town of Hillisburg. The Clinton County Health Department has received numerous complaints of illegal dumping at the site and drums and containers of unknown content are present. The hardware store also performed light machining and gasoline sales and vehicle repairs were performed at the site. Residents report that used oil and other liquids were "dumped out the back door" and the USTs are still present. The building is partially collapsed and the structure is extremely unsafe. Due to the illegal dumping of chemical containers and the presence of potential asbestos-containing materials (crumbled plaster, etc.) in the debris, safe demolition of the building cannot occur without assessment. To compound the issue, the portions of the building that are still standing are not structurally sound and subject to collapse, so exterior assessment of the USTs and former surface dumping area cannot be safely accomplished. The residents of the town utilize private drinking water wells and the site is adjacent to a tributary to Wildcat Creek. There is a strong potential that impact to private wells and/or the tributary has occurred or will in the near future without action. Furthermore, collapse of the remaining portions of the building is an immediate threat to the neighbors. To prevent a catastrophic loss of life or potential impact to the drinking water wells or surface water, the County plans to selectively demolish and assess the structure (potential ACMs and illegal waste containers) simultaneously to limit the potential of further chemical or asbestos fiber releases. After the building and hazardous materials are removed and properly disposed, the USTs and former surface dumping will be assessed. The County needs this assessment grant to assist in covering the assessment costs.

Another health and welfare concern is migration of contaminants from brownfields to Wildcat Creek, Prairie Creek, and Sugar Creek, tributaries to the Wabash River. There are multiple brownfield sites identified within a ¼ mile threatening these sensitive ecosystems. These streams and connected tributaries have served as the waste conveyance system for industrial operations and urban runoff, resulting in the Wildcat Creek being deemed an "impaired waters" by IDEM (waters that do not meet applicable water quality standards). These conditions present a threat to the viability of the streams and watershed ecosystems, as well as potential exposure of residents and visitors (via direct contact and ingestion) from the waterways' uses for recreation. The Wildcat Creek watershed is home to various species of bird (peregrine falcon), reptile (butler garter snake), and plants (American manna-grass and scarlet hawthorne) that are listed in Indiana's Endangered, Threatened, and Rare Species program. These and many other sensitive species require protection from contaminated run-off and groundwater.

b. Financial Need: Clinton County has been decimated by the economic downturn. In the last five years alone, there has been a 16.4% decline in higher-paying manufacturing jobs, which has



crumbled the economic base and decreased the money available for community investment. Nidec, which historically employed over 600 people, shuttered their factory eight weeks ago. The former Exide Battery plant employed over 600 people and the Norfolk Southern Railroad historically employed over 5,000 people, and Federal Mogul, which at one time, employed close to 1,200, has reduced its current workforce to around 100 people. The County needs funding to assess brownfields that are contributing to the demise of neighborhoods and commercial/industrial zones. Redevelopment of these sites will provide impoverished residents with sorely needed employment and increase the County's property and income tax bases.

(i) The County's primary financial concern is the lack of quality employment opportunities, which is disproportionately impacting impoverished residents. Over the last ten years years, the poverty rate for Clinton County has increased by 91.6%, from 8.3% to 15.9%, while the median income fell by 10.6%. Over the past 30 years, per capita income has only risen a meager 11.5%, ranking Clinton county 90th (lowest increase) out of 92 Indiana counties while during this same period the per capita income rose by 46.7% in the U.S. and 31.9% in Indiana. Unemployment in Clinton County has increased an incredible 267.9% over the last 10 years (*STATS Indiana, Counties in Profile*). As shown in the following tables, the County and its urban areas per capita income and poverty rates are significantly worse than Indiana and the U.S. The towns and neighborhoods of the priority brownfields, (Section 1.a) have the highest numbers of sensitive populations and poverty rates in the County.

	<u>Frankfort</u>	<u>Clinton County</u>	<u>Indiana</u>	<u>National</u>
Population	16,422 ¹	33,224 ¹	6,483,802 ¹	308,745,538 ¹
Unemployment	8.5% ³	8.3% ²	8.9% ²	9.1% ²
Poverty Rate	17.7% ³	15.9% ³	13.2% ³	14.3% ³
Percent Minority	16.1% ¹	9.0% ¹	15.7% ¹	27.6% ¹
Percent Hispanic	25.0% ¹	13.2% ¹	6.0% ¹	16.3% ¹
Per Capita Income	\$17,507 ³	\$21,067 ³	\$24,044 ³	\$26,530 ³

	<u>Kirclin</u>	<u>Census Tract 9506 (Exide)</u>	<u>Census Tract 9508 (FWRI)</u>	<u>Clinton County</u>
Population	788 ¹	3,455 ¹	3674 ¹	33,224 ¹
Unemployment	Not available	15.4% ³	11.2% ³	8.3% ²
Poverty Rate	24.9% ³	23.5% ³	22.9% ³	15.9% ³
Percent Minority	1.5% ¹	12.9% ¹	28.2% ¹	16.1% ¹
Percent Hispanic	1.3% ¹	19.6% ¹	41.7% ¹	13.2% ¹
Per Capita Income	\$19,970% ³	\$14,168 ³	\$14,405% ³	\$21,067% ³

¹Data from 2010 U.S. Census and is available at www.census.gov

²Data from Bureau of Labor Statistics and is available at www.bls.gov

³Data from 2009 American Community Survey and is available at factfinder.census.gov

Compounding the problem is the fact that once manufacturing jobs are lost, replacement jobs are generally lower paying in the service sector. This has been a systemic trend with the low-income residents in the County being hardest hit. In the last 10 years, families receiving food stamps in the County has increased by 266% and students receiving free school lunches have increased by 92.6% (*STATS Indiana, Family and Social Services Data, 2010*).

The second component of the Coalition's financial need is the decrease in available revenue the County has to operate and provide redevelopment support. Indiana recently revised its property tax codes to provide property tax cuts. At the same time, the recession resulted in the reduction of property values, resulting in gross taxing authority of the County (county and local taxes) falling a staggering 27.6% since 2008 (*2010 Property Tax Report, Clinton County*). The revenue



reduction caused elimination of important programs like the unsafe building fund, leaving sites such as the Hillisburg site a continuing threat. As industrial facilities close and are abandoned, the number of brownfields in the County increases and property values are suppressed, further decreasing property tax revenue. This lack of revenue has resulted in loss of government staff as well. For example, Frankfort has reduced employees by over 18% in the last five years. This has further reduced the community's ability to tackle redeveloping these priority brownfields and begin to reverse this downward spiral. Based on the expected assessment scopes, the assessment/cleanup planning costs associated with the priority brownfields are estimated to be at least \$500,000. Without an Assessment Grant, the County will not be able to support the assessment of the priority sites identified in Section 1.a.i or the hundreds of other brownfields.

2. Project Description and Feasibility of Success

a. Project Description

(i) The County is applying for this grant to incentivize brownfields redevelopment in struggling neighborhoods in Frankfort and provide support/mentorship for redevelopment in smaller towns within the County. The County has developed a County-wide brownfields redevelopment strategy to help recover from the economic distress created by the decline in manufacturing only exacerbated by the nationwide recession. The brownfields program approach is directed by the goals of the County's Comprehensive Plan. The goals of the plan were reinforced by the recent Roundhouse Redevelopment Master Plan (discussed below) and it is from community input during meetings associated with development of that plan that the County developed the **Specific Assessment Grant Goals**. The County also desires to improve the citizens' health and welfare; ensure adequate utilities and infrastructure are available; improve existing roadways and develop an appropriate alternative transportation system; diversify the employment base; link existing parks/greenspace and natural amenities; and protect and preserve the rural character of the County. The Assessment Grant will kick start the brownfields program by providing funds to first, assess the nature and extent of contamination at priority high risk brownfields and other community-identified sites to evaluate threats to sensitive populations and ecosystems and support redevelopment, and second, provide support for area businesses who plan to purchase and redevelop smaller sites located throughout the County. This initial approach may be revised as the project progresses if intended outputs/outcomes (Section 2.b.ii) are not being achieved and/or the community concerns arise.

1) Assessment and redevelopment of key brownfields: Because there are so many brownfields in Clinton County, the County simply cannot address them all at once. The County has selected five priority sites in disadvantaged areas of the county; three sites which when redeveloped will provide key public facilities, cultural areas, and manufacturing growth opportunities in impoverished and ethnic neighborhoods, and two known sites that are imminent threats to life and the environment. By assessing these key sites, the County hopes to improve the vitality of existing neighborhoods, create jobs, and limit urban sprawl.

The **Frankfort Westside Redevelopment Initiative (FWRI)** is a top priority for Clinton County. The 125 acre, FWRI area contains five priority sites in one; the former Frankfort Roundhouse, Indiana Brass site, Exide Distribution Center, a metal salvage yard, and the former Frankfort Petroleum site along with multiple smaller sites. The County has been working with the Frankfort Mid-West Rail Heritage (FMRH) community group to redevelop the roundhouse site. The Historic Landmarks Foundation of Indiana lists the roundhouse among the top most endangered sites in the state. Through a planning grant from the Indiana Office of Community and Rural Affairs (OCRA), a master redevelopment plan and feasibility study was developed after numerous community meetings with residents and local leaders. The Roundhouse Redevelopment plans also incorporate the Indiana Brass, former Exide Distribution Center, and existing metal salvage yard sites. The master plan calls for creation of a convention center with hotel and café, banquet center, rail interpretive center and museum, indoor and outdoor community performance centers, and a building for a Community College (a County priority). Norfolk and Southern Railroad, the current owner, **has provided a written offer of donation** of the roundhouse property and the City of Frankfort currently has control of the Indiana Brass site, both required to implement the first two phases of the redevelopment plan. The community



believes redevelopment of the roundhouse sites will catalyze redevelopment of the other large brownfields and the multitude of smaller brownfields in the FWRI. Most of the sites contained with the FWRI are not secured, bordered by poor residential neighborhoods (census tract 9508), and in close proximity to Redman Park. The unsecured sites are accessible to children and residents representing a direct contact threat and a threat of vapor intrusion into nearby residential buildings. The County needs the Assessment Grant to assess the FWRI sites to prepare these properties for redevelopment and evaluate a potential immediate health risk to the local residents. It is anticipated extensive Phase II Environmental Site Assessment (ESA) work will be required to assess the nature and extent of contamination at these sites and develop appropriate remedial planning, including implementation of engineering controls and hazardous building material abatement to allow for safe reuse.

The former **Exide** battery manufacturing plant is located in the northeast section of Frankfort. The plant, which at one time, employed 600 local residents, is vacant surrounded on three sides by low to moderate income residences (census tract 9508). The 17-acre site contains an 187,000 square foot building. This brownfield poses direct contact and inhalation exposure risks from soils and vapor intrusion into adjacent buildings, respectively. Migrating impacted groundwater also represents a direct threat to the flora and fauna of Prairie Creek (located ¼ mile north and west). The size and location of the site, makes the Exide plant a priority site for redevelopment as a potential light manufacturing/assembly plant, business incubator, or mixed use professional commercial/residential site. An extensive Phase II ESA is anticipated to facilitate cleanup planning for removal of impacted soil, groundwater treatment, and implementing exposure controls.

The former **Nidec** Plant is located in the industrial park immediately west of the FWRI. Once employing over 600 people, the plant manufactured electro-magnetic switches. The 191,000 square foot plant is located on 38 acres and was shuttered in late 2011. The County has made attracting another manufacturer to this site a top priority to provide much needed high paying jobs. By determining the nature and extent of the environmental impact created by the former manufacturing activities, the County will be able to determine what cleanup activities will be required to quickly attract an employer that can safely reuse the site. Based on the site's location in the industrial park, this site's reuse will be protective of sensitive populations and ecosystems, preserving greenspace, and providing immediate economic benefit through job creation.

Specific information on the **Hillisburg Hardware/Tractor** site was previously discussed in Section 1. The site will require selective demolition, careful assessment, UST removal, impacted soil removal and characterization, and proper disposal of illegally-dumped materials. Assessment will also include evaluating the risk of impact to adjoining private drinking water wells. The site will likely be developed for residential use, a community garden, or pocket park.

Similarly, the **Kirklin Auto Repair/Salvage** site, previously discussed in Section 1, is an imminent health threat. The greatest concern is properly assessing contamination with a Phase II ESA and disposing of the hazardous materials documented at the site in accordance with a site-specific remediation plan, both of which will be implemented with grant funds. In addition, removal of USTs at this site to remove the exposure risks to neighboring residents and the town's water supply well, will be accomplished through the use of grant funds. Vapor intrusion from this site will also be evaluated. The site could be reused for a commercial enterprise. The County would also like to assess two other brownfields (former Machine shop and former firing range) located within Kirklin that adjoin the town park.

2) Assessment/redevelopment of smaller manufacturing sites and abandoned/underutilized gas stations located in Rossville, Colfax, Mulberry, and Michigantown: These smaller communities have intermingled commercial, industrial, and residential neighborhoods generally concentrated along main streets. Redevelopment of these sites with multi-use developments will remove chemical exposure risks to residents and revitalize downtown districts.

3) Assessment of sites to support additional redevelopment: Sites will be assessed as developer interest occurs during the grant project. These assessments will support smaller



commercial/industrial redevelopments in areas with existing infrastructure, creating local jobs and amenities without infringing on County greenspace.

With this approach, the County will support revitalization of hardest hit urban areas, mitigate two immediate health/environmental threats, and provide support to the rural communities in the County without the resources or experience to implement a brownfields program. Assessment data will determine the extent of brownfields contamination; evaluate exposure pathways and develop mitigation/remediation strategies protective of human health and the environment; and support redevelopment planning and marketing of brownfields. As the grant project progresses, the County will integrate high-risk and developable sites identified by the community members and organizations (Sections 2.b.ii, 3.a, and 3.c) into the project and utilize grant funds to assess these sites. The County will assess a minimum of five sites using the Assessment Grant funds.

Clinton County and a qualified environmental consultant (the project team) will lead the brownfields program (Section 2.c.i). The Clinton County Economic Development (CCED) office will act as lead organization on the project. CCED will manage the day-to-day grant operations including: updating/maintaining the brownfields inventory; distributing project information to the community; assessment site selection; and progress tracking. CCED will be responsible for procuring contractual services and submitting the required reports to the U.S. EPA.

After being awarded the Assessment Grant, the County will prepare a Work Plan with community support (Section 3.a) and secure approval from the U.S. EPA. The project team will focus on expanding the County brownfield inventory. Because of legal issues associated with publicly listing private properties, the inventory will focus on developable sites, securing permission to add these sites to the inventory, and creating a list that includes these approved sites and publicly listed contaminated sites. The County, environmental consultant, and community organizations (Sections 2.b.ii, 3.a, and 3.c) will be involved in the inventory, which will continue throughout the grant period. After being deemed eligible by the U.S. EPA, the community will be notified and the site will be assessed through performance of a Phase I Environmental Site Assessment (ESA) and/or a Phase II ESA. Site Assessment procedures will be instituted to ensure that the community is protected from contaminants during assessment work (Section 4.a). Upon receipt of assessment results, the environmental consultant will work with the County and partners to devise liability management, cleanup, and site use strategies that support redevelopment efforts and improve the health of residents and the environment. After completion of initial assessment activities, investigations may be needed to further define the extent of contamination and design environmental response actions for cleanup and safe reuse of the site. Contaminated sites may be entered into the Indiana Brownfields Program (IBP), Voluntary Remediation Program (VRP), or Underground Storage Tank (UST) Program. The results of assessments will be disseminated to the community via public meetings and notification of community organizations (Section 3.a -3.c). If health threats are identified, IDEM and Clinton County Health Department will be notified (Section 3.b). If needed, the County will seek additional funding from local and state sources and/or the U.S. EPA (Section 2.b.iii) for assessment activities and subsequent environmental response activities.

b. Budget for EPA Funding and Leveraging Other Resources

(i) Budget:

Budget Categories	Hazardous Substances Assessment Grant Project Tasks					Total Budget
	<i>Task 1</i> Programmatic Costs	<i>Task 2</i> Community Outreach	<i>Task 3</i> Site Inventory	<i>Task 4</i> Site Assessment	<i>Task 5</i> Cleanup Planning	
(programmatic costs only)						
Personnel	\$1,500					\$1,500
Travel			\$200			\$200
Supplies		\$500				\$500
Contractual		\$1,000	\$1,000	\$180,300	\$15,500	\$197,800
Total Budget	\$1,500	\$1,500	\$1,200	\$180,300	\$22,500	\$200,000



<u>Budget Categories</u>	<u>Petroleum Assessment Grant Project Tasks</u>					
(programmatic costs only)	<i>Task 1</i> Programmatic Costs	<i>Task 2</i> Community Outreach	<i>Task 3</i> Site Inventory	<i>Task 4</i> Site Assessment	<i>Task 5</i> Cleanup Planning	Total Budget
Personnel						
Travel	\$2,200		\$400			\$2,800
Supplies		\$500				\$500
Contractual		\$1,000	\$2,000	\$177,100	\$16,800	\$196,900
Total Budget	\$2,200	\$1,500	\$2,400	\$177,100	\$16,800	\$200,000

Task 1 Programmatic Costs: Programmatic costs of \$3,700 are included. Clinton County is providing all personnel costs except for \$1,500 (included in the hazardous substances grant budget) for updating and maintaining brownfields information (\$50/hour for 30 hours). The petroleum grant includes one person's attendance at two U.S. EPA Brownfields Conferences (\$1,100 per trip).

Task 2 Community Outreach: Community outreach costs of \$1,500 are included for each grant. This includes contractual costs of \$2,000 for translating services and conducting community outreach meetings, and County costs of \$1,000 for preparing, printing, and mailing project information and marketing documents (\$500 for each grant).

Task 3 Site Inventory and Selection: The County has an initial inventory; the budget includes inventory maintenance costs of \$3,600 which includes travel costs of \$600 for identifying new sites and showing sites to interested parties. The environmental consultant will assist in compiling the list throughout the project at a cost of \$3,000.

Task 4 Site Assessment: Sites will be evaluated through performance of Phase I and/or II ESAs in accordance with All Appropriate Inquiry (ASTM Standard E1527-05) and other ASTM standards. The County will focus assessment funds on determining the nature and extent of the contamination at priority sites where the history is known. For these sites, a Phase I ESA may not be required. For priority sites with an imminent property transaction, a Phase I ESA will be completed regardless of existing historical knowledge. The County also anticipates supporting due diligence associated with sites where business interest occurs during the project. Based on past experience in the County, anticipated Phase I ESA costs will range from \$5,000 to \$8,000, and Phase II ESA costs will range from \$25,000 to \$60,000. The hazardous substances budget includes contractual costs of \$180,300 based on conducting six Phase I ESAs at \$6,000 each (\$36,000 total), and four Phase II ESAs at \$36,075 each (\$144,300 total). The petroleum budget includes contractual costs of \$177,100, based on conducting six Phase I ESAs at \$5,500 each (\$33,000 total), and five Phase II ESAs at \$28,820 each (\$144,100 total). These are averaged costs used for budgeting. The actual costs may vary.

Task 5 Cleanup Planning: The County will conduct cleanup planning as required by the IBP, VRP, or UST programs for brownfields where redevelopment is imminent. This may include preparing Remediation Work Plans (RWPs), assessing brownfields cleanup/redevelopment alternatives, or evaluating institutional and engineering controls. Contractual costs for this task are estimated at \$22,500 (hazardous substances) and \$16,800 (petroleum), based on completing three hazardous substances RWPs at \$7,500 each, and three petroleum RWPs at \$5,600 each.

(ii) Tracking and Measuring: By completing this project, the County hopes to identify the brownfields that are exposing residents and the environment to contaminants, limit exposures associated with these brownfields, and bring these abandoned/underused sites back into productive use, giving residents a chance to find jobs comparable to the ones they lost. In order to evaluate progress, the County will measure and track/document the listed outputs and outcomes. Once a site has been determined to be eligible, it will be entered into the Assessment, Cleanup, and Redevelopment Exchange System (ACRES). The ACRES profiles will be updated following completion of Phase I and II ESAs, remediation, and/or redevelopment activities.



Outputs		Outcomes	
Number of community meetings	Number of RWPs completed	Acres of land assessed	Jobs created/retained and tax revenue generated
Number of brownfields identified	Number sites where cleanup planning was conducted	Acres of property remediated	Other leveraged funding
Number of Phase I and II ESAs completed		Acres of property redeveloped	Redevelopment investment value
			Acres of parks or greenspace preserved/created

The County will evaluate the project progress semi-annually to determine if funds are being expended as anticipated and if the completed assessments are catalyzing remediation and/or redevelopment investment and creating jobs. The County will adjust the approach to selecting sites for funds if it appears that the project is not generating the expected outcomes.

(iii) Leveraging: Assessment Grants can be vital for catalyzing brownfields redevelopment projects because they cover the costs of site assessment needed to support liability management, project design, and remediation planning. This alone is rarely sufficient to ensure a successful redevelopment. The following table identifies local resources that the Coalition can access to support assessment and subsequent cleanup and redevelopment activities.

Source	Resources Leveraged/Role of Resources	Estimated Value	Likelihood
County ¹	1) Meeting rooms, educational materials, and staff needed for press releases, meetings/hearings, Facebook, LinkedIn updates to support outreach. 2) Staff to document site selection process and oversee grant financial transactions to support programmatic activities. 3) Site access support (bush/debris clearing building access, etc.) to support Phase I and II ESA activities.	\$25,000 for outreach/site selection (500 hrs at \$50/hr) \$10,000 for site access (equipment/staff costs for ten days @ \$1,000 per day)	100% County will provide in-kind resources
OCRA	Planning Grant for Roundhouse Master Plan, Feasibility Study, Conceptual Design	\$50,000	100% Grant Complete
Community Matching Funds ¹	Clinton Chamber of Commerce ¹ \$2,000 Clinton County Visitors Bureau ¹ \$2,500	\$4,500	100%, additional funding for remedial planning
Environmental Consultant	Required documentation/reporting including: monthly grant status reports, Quality Assurance Project Plan, Health and Safety Plans, attendance at project administrative/coordination meetings.	\$10,000 (100 hrs at \$100/hr)	100% Consultant required to provide in-kind resources
IU Kokomo ¹	Students and staff to conduct ground surveys of the County to identify and prioritize developable sites.	800 labor-hours (20 students, 16 hours each)	90%-100% student participation dependent
Tax abatement	Property tax abatement on new equipment and real property improvement for periods up to 10 years	Depends on value of redevelopment	100% if eligible

¹ Commitment letters are included in Attachment C.



The following existing state and federal resources are also available by application and may be used following expenditure of grant funds:

- OCRA – Indiana Main Street, Demolition Grants.
- U.S. EPA Clean Water State Revolving Fund and Indian Brownfields Program (IBP) Revolving Loan Fund – loans for cleanup/remediation activities.
- Excess Liability Trust Fund (ELTF) – reimbursement of monies spent to clean up petroleum releases from underground storage tanks.
- State of Indiana Economic Development for a Growing Economy, Headquarters Relocation Tax Credit, Hoosier Business Investment Tax Credit, and Industrial Recovery Tax Credit - tax credits and abatements for redevelopments.
- Additional U.S. EPA Assessment, Cleanup, and Revolving Loan Fund (RLF) Grants – additional Assessment Grants (up to \$1 million per grant), cleanup (\$200,000 per grantee-owned site), and RLF (up to \$1 million).

c. Programmatic Capability and Past Performance:

(i) Programmatic Capability: The County is ready to implement an Assessment Grant and will request to begin community outreach activities prior to Cooperative Agreement (CA) approval. The project team will include representatives from the County, Clinton County Economic Development, City of Frankfort, and an environmental consultant. The experience and qualifications of these key project team members are discussed in the following paragraphs.

Mr. Shan Sheridan, director of the Clinton County Economic Development Department, will serve as the project director. Mr. Sheridan has over 15 years of experience in economic development and has overseen numerous redevelopment projects including the Abilities Services, Inc. redevelopment on a former U.S. EPA Superfund brownfield site. Clinton County staff will support Mr. Sheridan and provide guidance on use of grant funds. The County will endeavor to maintain the grant management team in place during the grant project. The County's management continuity plan, in the event of loss of the project director, relies on the availability of Mr. Mark Mills, County Planner. Mr. Mills is experienced in dealing with grants and intimately familiar with the **Specific Assessment Grant Goals**. Mr. Mills works closely with the Economic Development Department and will be intimately involved with grant operations so he can immediately step in as the replacement project director in case of loss of the active project director. Mr. Mills and the environmental consultant will be responsible for continued operations, selection, and training of a successor project director, should it become necessary. The County's Auditor Office will provide financial tracking and grant documentation support to ensure that grant reporting requirements are met.

The County will retain a highly competent environmental consultant to assist in managing and tracking activities funded by the Assessment Grants and conducting environmental assessments. The environmental consultant will be retained using a Qualifications-Based Selection Process that complies with the applicable federal procurement regulations (40 CFR §31.36). The selected consultant will be experienced in all aspects of U.S. EPA Assessment Grant management, and will have extensive experience with the Indiana Voluntary Remediation Program (VRP), successfully managed at least five U.S. EPA Assessment Grants projects, and at least three successful brownfields redevelopment projects where multiple brownfields redevelopment financing incentives were leveraged.

The Clinton County Economic Development Department (CEDD) works to encourage new and existing businesses in the County and provides access to real estate to support continuing economic growth. The CEDD was instrumental in assisting the LAPD expansion and corporate relocation to the county, and the HNK, Inc. and NTK, Inc. expansions; adding significant employment to the county. The CEDD will market brownfields to businesses and assist developers with site selection, and promote brownfield incentives.

(ii) Adverse Audits: The County has not received adverse audit findings from an OMB Circular A-133 audit or an audit conducted by a federal, state, tribal, or local government inspector or similar organization.



Past Performance: Clinton County has not been a previous recipient of a U.S. EPA Brownfields Assessment Grant. The County has extensive experience managing federal and non-federal assistance agreements, examples of which are listed below:

- Indiana Office of Community and Rural Affairs (OCRA): \$50,000 Planning Grant for Roundhouse Feasibility/Master Plan used to prepare redevelopment plans for a priority redevelopment site.
- OCRA Planning Grant: \$50,000 from OCRA used to develop the County Comprehensive Plan which was utilized as a framework for the **Specific Assessment Grant Goals**.
- Clinton County Emergency Management Agency: \$49,000 annual grant to assist in salary reimbursement and \$3,679 grant to upgrade information technology from the Emergency Management Performance Grant from the U.S. Department of Homeland Security.
- Public Health Preparedness: \$7,129 grant from Centers for Disease Control and Prevention (CDC) for planning and preparing for pandemic response.

The County complied with funds disbursement requirements, financial tracking, reporting requirements, submitting technical documents, documenting project progress, and auditing requirements for the listed grants. The County has the procedural knowledge to successfully disburse Assessment Grant funds and track Assessment Grant expenditures.

3. Community Engagement and Partnerships

a. Community Involvement: As a major partner in the development of both the Roundhouse Master Plan and Comprehensive Plans, the CCED knows the importance of involving the community in planning. During formation of the Roundhouse Master Plan, feedback from the community guided development of the plan's goals. Following notice of an Assessment Grant award, the County will announce the award and the availability of the draft Work Plan to the community through a press release to the local newspaper (*Frankfort Times*), the chamber of commerce weekly newspaper, and by posting a notice on the County's internet website. The County will place advertisements on the local area radio stations (WILO 1570 AM, WILO2 94.1 FM, and WSHW 99.7 FM) to reach the less literate members of the community and send written or electronic notices to local business leaders. The County will establish a Facebook and LinkedIn group for the grant, to allow the community to interact with the County during the entire project. The County will include instructions on reaching these internet forums in the initial press release. As previously referenced, 13.2% of the County, 25.0% of Frankfort, and 41.7% of the FWRI residents are Hispanic; therefore the County will also advertise in *La Comunica* (Spanish community newsletter), on the bilingual radio station serving the area (WSYW 810 AM), and make written materials available in Spanish. Hard copies of the draft Work Plan will be located at the County office and local public libraries to ensure access for those without appropriate information technology availability, knowledge, or experience. The public will be able to provide comments verbally to CCED, electronically (Facebook/LinkedIn), or in writing via email or letters. The comments will be discussed during a public meeting hosted by the CCED. The draft Work Plan will be modified in response to relevant comments.

Following Work Plan approval, the County will schedule kick-off meetings to acquaint the community with the project and goals. The meetings will be held at various locations within the County with at least one of the kick-off meetings broadcast via a webinar for citizens who cannot attend the meetings, with additional meetings scheduled, if needed. The County will ask the public to identify sites they consider to be brownfields and sites they feel are impacting health and welfare. These sites will be added to the inventory of developable sites. The meeting presentation materials and minutes will be posted on Facebook, LinkedIn, and the County website. Sites will be selected for assessment based on community concern, developer interest, and the County's plan to evaluate priority sites. As sites are selected, the County will present the reasoning for the selection at a public meeting and solicit public feedback. The County will use community comments, viability of the project, and compatibility with the Comprehensive Plans as metrics to determine if grant funds will be utilized to assess sites. Project updates will be provided monthly at public County Commission meetings. County project team representatives will also attend city and community organization meetings to discuss the project and/or specific



site assessments. Where appropriate, a translator will be employed to assist the County's Hispanic community in participating in the public process.

After completing an assessment, the primary information flow will be outward to the community, notifying local stakeholders about assessment results, and explaining health and environmental impacts. Assessment results will be posted on the County website, Facebook, and LinkedIn. If health threats are identified, written notices will be sent to impacted citizens, and the Clinton County Health Department will be contacted (Section 3.b). When cleanup and/or redevelopment planning is initiated, explanations of plans and rationales and solicitation of comments on those plans, will be implemented. At project close, the County will hold a final public meeting to notify the community of the project outcomes. The presentation materials and minutes will be archived and placed on the County website, Facebook, and LinkedIn.

b. Agency Partnerships: The County will develop partnerships with local and state environmental/health agencies to ensure that the project is successful. The Clinton County Health Department (CCHD) has been actively involved in education/notification, testing, and monitoring related to septic system concerns, clandestine methamphetamine laboratories, lead poisoning, and groundwater protection. The CCHD provides blood lead testing to children and can provide groundwater testing, if needed. The CCHD has been instrumental bringing dangerous sites, such as the Hillisburg and Kirklin sites, to the forefront of the priority list and took a lead role in assisting with the assessment and public notification to parents of school children regarding the mercury release in the school. The expertise and experience of CCHD will be used to help identify/verify off-site health risks posed by contamination; identify toxicological issues and perform risk evaluations; design and conduct notification/education programs; and coordinate health testing if brownfields contaminant migration is confirmed.

The County will establish a strong partnership with the Indiana Department of Environmental Management (IDEM) to ensure assessment, cleanup, and redevelopment of brownfields is conducted in compliance with the rules and guidance promulgated by the IDEM VRP (Indiana VCP) and/or IDEM UST program, as applicable. Partnering with IDEM and/or Indiana Brownfields Program (IBP), district and headquarters staff will be important for technical support, resolution of regulatory or procedural issues, and interpretation of rules and guidance documents. For petroleum-impacted sites, IDEM will be involved in the site eligibility determination prior to assessment. IDEM will review and approve Remediation Work Plans and Remediation Completion Reports for sites where response actions are completed. If contamination discovered through assessments potentially impacts the health of local populations, IDEM and the CCHD will be notified and brought in as project partners. The cleanup criteria established by IDEM under the Risk-Integrated System of Closure (RISC) will be used to identify and address on-site health and environmental threats.

There are no U.S. EPA Environmental Workforce Development and Job Training programs operating in the County. The County plans to use the local Indiana Region 4 Workforce Board (WorkOne-Frankfort) and the Learning Network (Purdue Extension) to connect with the available workforce and promote local hiring for brownfields assessment and redevelopment activities. The County will use its connection with Indiana University Kokomo (Section 3.c) to link County residents to the required education and training necessary to learn skills needed to secure employment in the environmental field. By using area minority and impoverished students to inventory developable sites, the County will provide students with work experience and spur interest in brownfield redevelopment careers. The County will encourage their environmental consultant to demonstrate Phase I ESAs to students and present interactive summaries of Phase II ESAs.

c. Community-based Organizations: The County has identified the following organizations who will be project partners. The organizations' letters of support are included in Attachment D.

Frankfort Mid-West Rail Heritage (FMRH): The FMRH is a group of County residents committed to restoring and redeveloping the roundhouse property (catalyst for redeveloping the FWRI). The FMRH will assist the County in pursuing additional grant opportunities, marketing the sites, attracting developers, and be a resource for the historic preservation portion of the



proposed project. They will provide community outreach of grant activities through their website.

Healthy Communities of Clinton County Coalition (HCCC): HCCC is an organization dedicated to improving the overall health of Clinton County citizens. HCCC, recent recipient of an Achieve grant (1 of 40 communities nationwide), works in conjunction with the Indiana Minority Health Coalition and will assist the County in communicating exposure hazards and environmental safety to the community via direct communication with coalition members, appearances on local talk radio, and writing newspaper articles, etc.

Indiana University Kokomo (IU): IU will provide students and staff to conduct ground surveys of the County to identify and prioritize developable sites and provide other support, as needed (community and health surveys, etc.). Students will develop conceptual redevelopment designs and participate in brownfields design charrettes to support redevelopment of sites or areas.

Clinton County Chamber of Commerce (Chamber): The Chamber works to represent and promote county businesses and encourage business/industrial investment in the community. The Chamber will assist in identifying additional brownfields, support redevelopment planning, help market assessed brownfields, and inform businesses/developers of the availability of grant funds.

Clinton County Purdue Extension (CCPU): The CCPU currently works closely with the Hispanic populations in the county. The CCPU will serve as a liaison between the County and the Hispanic community, providing translation services, and public notice through *La Communica*. They will also provide workforce development through the Learning Network.

4. Project Benefits: The **Specific Assessment Grant Goals** identifies growth that enhances the quality of life and creates economic vitality while preserving environmental integrity as an objective. With an Assessment Grant, the County can incentivize redevelopment of brownfields and improve health, welfare, economic, and environmental benefits to the community.

a. Welfare and/or Public Health: Redevelopment of brownfields will remove sources of contamination limiting inhalation, ingestion, and dermal exposures protecting and improving health and welfare. The specific health and welfare benefits associated with the priority sites are summarized below. Similar benefits are expected from redevelopment of smaller brownfields.

Priority Site	Redevelopment Plan/Benefits
FWRI	Hazardous building materials (i.e., asbestos and lead-based paint) will be identified and abated, most buildings being historically preserved with portions demolished. Underground storage tanks will be removed. Petroleum, chlorinated solvent and metal impacted soil/groundwater will be identified and remediated to limit vapor intrusion and inhalation concerns for minority/ethnic residents. The site will be redeveloped as previously described.
Exide	Waste/junk materials will be removed and recycled as applicable. The extent of impacted soil and groundwater will be identified and cleaned up to address direct contact and ingestion concerns for low-income residents. If needed, an exposure barrier will be constructed to allow safe reuse of the site as previously described. Contaminated storm water will be eliminated, protecting Prairie Creek.
Nidec	The extent of metals, VOCs and solvent impacted soil and groundwater will be determined. If needed, soil and groundwater cleanup will begin, and barrier systems will be installed to provide safe reuse as a high-tech manufacturing site.
Hillisburg Hardware/ Tractor	Hazardous building materials will be identified and abated, and the building demolished. During demolition illegally dumped materials will be characterized/disposed. The USTs will be removed and waste oil dumping area remediated. Impact will be delineated. Evaluation of threats to private wells and vapor intrusion will be determined. The site will be redeveloped as previously described.
Kirklin Auto Repair/ Salvage	The hazardous materials (including remaining mercury containing equipment) will be characterized and disposed. USTs will be removed. The full extent of impacted soil/groundwater will be determined. If needed, groundwater cleanup will begin, and vapor intrusion threats will be evaluated to nearby residential and commercial properties. The site will be redeveloped as previously discussed.



Redevelopment of these brownfields epitomizes the equitable development principles of utilizing new investment in economically disadvantaged neighborhoods in a way that directly benefits residents. Because this work will be completed on existing industrial sites, residents will reap the benefits without being displaced. These outcomes coincide with the guiding Livability Principles¹ of increasing economic competitiveness, leveraging federal investment, valuing and supporting the community and neighborhoods. The redevelopment of priority brownfields will also limit nonpoint pollution sources and illicit discharges to improve water/sediment quality in the Wildcat Creek, Prairie Creek, and Sugar Creek, resulting in reducing contaminants in the creeks, improving aquatic life and allowing for additional recreational opportunities.

Assessment Grant operating procedures will ensure that the community is protected from contaminants during assessment work. A Health and Safety Plan (HASP) will be completed for each site where intrusive sampling will occur, and access to the site will be controlled with fencing and signage during the assessment. When subsurface samples or hazardous building materials samples are collected, the release of particulates and vapors will be monitored and controlled. Decontamination/purge water will be containerized on-site and appropriately disposed. The County will use the assessment data generated to determine how to protect the community during redevelopment activities.

b. Economic Benefits and/or Greenspace: Brownfield redevelopment will result in job creation, increasing the tax base, and preservation/enhancement of greenspace, all of which will help the County meet its **Specific Assessment Grant Goals**.

(i) Economic Benefits: County residents are concerned about having adequate incentives and amenities to attract redevelopment and new high-paying jobs to counter the devastating job losses. The County believes the increased retail, recreational, and educational options spurred by brownfields redevelopment will improve living conditions and attract additional development, maintaining the vibrancy of its commercial districts and prevent generating new brownfields. Expanded commercial districts will improve the tax base and diversify the work force, rendering it less vulnerable to swings in the economy. These outcomes coincide with the guiding Livability Principles of valuing and supporting the community and its neighborhoods and increasing economic competitiveness. In addition to improving the tax base, the redevelopment of the priority sites will have the following economic benefits:

- **FWRI:** Restoration of a the historic roundhouse (previously described), construction of a new community college, rail interpretive center, hotel, restaurants, and supporting developments will result in private investment of over \$30 million and create a place to meet, mingle, and learn. It is estimated that the FWRI will generate over 500 jobs.
- **Exide:** Mixed-use development or high-tech manufacturing in one of the poorest tracts in Clinton County will create job opportunities with easy access to commercial/retail amenities. Estimated investment of over \$5 million is anticipated, providing over 300 jobs.
- **Nidec:** Redevelopment/reuse of the existing building by attracting a new manufacturing company will result in private investment estimated to be over \$2 million and provide the County with upward of 350 new jobs.
- **Kirklin Auto:** Removing the unacceptable exposure risks through assessment and cleanup planning will eliminate the potential of another Clinton Central School event that cost tax payers an estimated \$200,000 in response costs. The site could be reutilized for a commercial enterprise employing up to 10 people.
- **Hillisburg Tractor:** Removing unacceptable exposure threats and by protecting the drinking water aquifer from contaminants associated with the former activities at the site, would protect taxpayers from having to supply municipal water to a remote location for a small number of residential and commercial properties, at a projected cost of over \$1 million.

¹ Principles adopted by the partnership between the U.S. EPA, United States Department of Transportation, and United States Department of Housing and Urban Development to promote smart growth.



(ii) Greenspace: The redevelopment of priority brownfields will result in creation of additional greenspace. For example, the Roundhouse Redevelopment Master Plan is designed to add over 7 acres of natural greenspace and includes a circular walking and biking path. Also, the Exide redevelopment will include expansion of greenspace for the impoverished neighborhoods. The County has demographics shifting towards an older population and with the economic downturn, residents are turning to community parks as an inexpensive family activity. These changes require a shift towards easily accessible trail and park systems that offer family friendly opportunities. The County must expand and connect its existing greenspace without infringing on the farmland that occupies a majority of the County. By redeveloping brownfields with parks and greenspace, the County can meet these requirements. Parks and urban greenspace along the waterways act as environmental and floodway buffers, keeping industry from infringing on these sensitive ecosystems. The County is planning to create a “river-walk” park through downtown Frankfort along Prairie Creek and assessment of brownfields along Prairie Creek will allow the County to acquire land needed.

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse: Sustainable development principles, including focusing development on existing cities, matching land uses to available infrastructure, and protecting natural resources and greenspace are woven into the Comprehensive Plan. Because most brownfields in the County are abandoned manufacturing buildings located in urban areas served by existing infrastructure, the reuse of these sites epitomizes sustainable redevelopment. The County has decided that Assessment Grant funds and other local programs will only be provided for projects where necessary infrastructure exists or can be upgraded at a reasonable cost. By incentivizing brownfield redevelopment, the County will direct development into areas with existing infrastructure, limiting expenditures on utility extensions, reducing the use of construction materials and reducing air emissions from construction. The County will be involved in brownfield redevelopments and will encourage/require the use of green site investigation (e.g., in-situ data loggers, direct-push drilling) and remediation techniques (e.g., idling reduction plans for equipment, diesel vehicle retrofit technologies) during brownfields site cleanup and redevelopment. The County will encourage incorporating innovative storm water management techniques (rain gardens, bioswales, etc.), and other sustainable design approaches, such as demolition and construction materials recycling, and use of low-volatile materials into brownfields redevelopments. For example, the plans for the roundhouse include stormwater management through rain gardens, use of recycled building products, and a desire for Leadership in Energy and Environmental Design (LEED) certification on the project. When existing buildings must be removed, the County will encourage deconstruction rather than traditional demolition. In addition, Clinton County has a strict light pollution ordinance and is known to have the “darkest skies in Indiana.” This ordinance reduces electricity use and enhances the Prairie Grass Observatory. For the **FWRI, Exide, and Nidec** priority brownfields (as well as other brownfield redevelopment projects), the County will encourage the installation of energy efficient heating/cooling and lighting systems, resulting in a reduction in electricity and natural gas usage and reduced operating costs, and encourage all new developments to pursue LEED certification. These sustainable development approaches will help the County reuse existing resources, reduce fossil fuel use and emissions, and minimize energy use and waste generation during brownfields redevelopment.



ATTACHMENT A
THRESHOLD DOCUMENTATION



**FY 2012 U.S. EPA BROWNFIELDS HAZARDOUS SUBSTANCES AND PETROLEUM
ASSESSMENT GRANT APPLICATION
SUBMITTED BY: CLINTON COUNTY, INDIANA**

THRESHOLD CRITERIA

1. Applicant Eligibility: Clinton County is applying for a Hazardous Substances and Petroleum Assessment Grant. Clinton County is a General Purpose Unit of Local Government in the State of Indiana.
2. Letter from the State or Tribal Environmental Authority: A letter from the Indiana Department of Environmental Management (IDEM) is included in Attachment B.
3. Site Eligibility and Property Ownership Eligibility: This application is for a community-wide Brownfields Assessment Grant. Consequently, site eligibility and property ownership eligibility criteria are not applicable.

ATTACHMENT B
LETTER FROM STATE AUTHORITY





INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

We Protect Hoosiers and Our Environment.

Mitchell E. Daniels, Jr.
Governor

Thomas W. Easterly
Commissioner

100 North Senate Avenue
Indianapolis, Indiana 46204
(317) 232-8603
Toll Free (800) 451-6027
www.idem.IN.gov

November 18, 2011

Shan Sheridan, Director
Clinton County Economic Development
259 East Walnut Street
Frankfort, Indiana 46041

Re: U.S. EPA Brownfields Grant Proposal
Acknowledgement Letter
Clinton County, Indiana

Dear Mr. Sheridan:

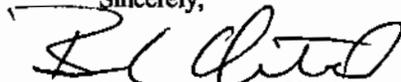
This letter is provided in support of the Clinton County (County) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfield Community-Wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) understands the County's goals and believes that the County has the capability to perform the proposed grant-funded activities based on the information provided.

IDEM confirms that Clinton County is applying for funding totaling \$400,000 (\$200,000 for Hazardous Substances and \$200,000 for Petroleum) to address brownfields identified within the County; a preliminary inventory has already identified approximately 200 brownfield sites within its boundaries. The County intends to use grant funds to conduct Phase I and/or Phase II environmental site assessments of priority brownfield sites, especially in the Westside Corridor. Grant funds will also be used to conduct cleanup and redevelopment planning to support reuse of these sites, as well as outreach activities to inform residents of the availability of grant funds and project progress.

Several sites in Clinton County are enrolled in the Indiana Brownfields Program for financial or technical assistance. The County commits to participating in either the Indiana Brownfields Program and/or the IDEM Voluntary Remediation Program, as applicable, for oversight of Assessment Grant-funded site activities. IDEM and the Indiana Brownfields Program are committed to supporting the County's efforts by continuing to provide technical assistance and program coordination should this grant be awarded by U.S. EPA.

Based on the information submitted, IDEM considers Clinton County a good candidate to receive U.S. EPA grant funding to continue its brownfield redevelopment efforts, which support Indiana's brownfields initiative. IDEM looks forward to continuing its partnership with the County and supports its efforts. For further assistance, please contact Michele Oertel of the Indiana Brownfields Program toll free at (800) 451-6027, ext. 4-0235, or directly at (317) 234-0235.

Sincerely,


Bruce A. Oertel, Chief
Remediation Services Branch
Office of Land Quality

BAO/mmo

cc: Deborah Orr, U.S. EPA, Region 5 (electronic)

ATTACHMENT C
COMMITMENT LETTERS FOR LEVERAGING



CLINTON COUNTY
BOARD OF COMMISSIONERS

125 Courthouse Square
Frankfort, IN 46041

Phone: 765-659-6309
FAX: 765-659-0206

Michael A. Beard

William J. Beard

George F. Evans

November 4, 2011

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue
Suite 500
Silver Spring, MD 20910

Re: Leveraged Local Government Resources for
FY2012 U.S.EPA Brownfields Assessment Grants
Clinton County, Indiana

Dear Mr. West:

Clinton County (the County) is providing this letter as documentation of our commitment to provide in-kind local government staff resources to support implementation of two FY2012 U.S. EPA Brownfields Assessment Grants (\$200,000 for Hazardous Substances and \$200,000 for Petroleum). Specifically, the County will provide up to 500 hours of staff time (includes grant project manager and staff) to support programmatic, community outreach functions and site selection associated with the Assessment Grant Project. These services include preparation of quarterly reports, progress meetings, financial tracking, preparation and distribution of Project information, hosting public meetings, and coordination with U.S. EPA personnel. The value of these in-kind services is approximately \$25,000 (500 hours at an average hourly rate of \$50). In addition the County will provide site access assistance such as clearing brush and debris and building access to support assessment activities. The value of these in-kind services is approximately \$10,000 (10 days at \$1,000 per day).

Very truly yours,



Michael A. Beard, President
Clinton Co. Board of Commissioners

November 18, 2011

Mr Shan Sheridan
Executive Director
Clinton County Economic Development
259 East Walnut Street
Frankfort, IN 46401

Re: Leveraged Funding from Local Government Boards
FY2012 U.S.EPA Brownfields Assessment Grants
Clinton County, Indiana

Dear Mr. Sheridan:

The Clinton County Chamber of Commerce (CCCOC) is pleased to support Clinton County's application for two FY2012 U.S. EPA Brownfields Assessment Grants (\$200,000 for Hazardous Substances and \$200,000 for Petroleum). As President of the Clinton County Chamber of Commerce, I am providing this letter as documentation of our commitment to provide leveraged funding to support the County's Assessment Grant Project. Specifically, the CCCOC will provide the County with \$2,000 to support costs related to Remedial Planning or remedial activities at local brownfield sites targeted for redevelopment, if requested.

The CCCOC is committed to supporting the County's Assessment Grant Project with our funding.

Very truly yours,



Kristi Bledsoe
President
Clinton County Chamber of Commerce

November 18, 2011

Mr. Shan Sheridan
Executive Director
Clinton County Economic Development
259 East Walnut Street
Frankfort, IN 46401

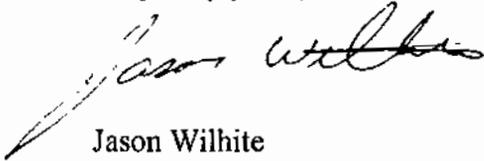
Re: Leveraged Funding from Local Government Boards
FY2012 U.S.EPA Brownfields Assessment Grants
Clinton County, Indiana

Dear Mr. Sheridan:

The Clinton County Visitor's Bureau (CCVB) is excited to support the County's application for two FY2012 U.S. EPA Brownfields Assessment Grants (\$200,000 for Hazardous Substances and \$200,000 for Petroleum). As Assistant Director of the Clinton County Visitor's Bureau, I am providing this letter to document of our commitment to provide leveraged funding to support the County's Assessment Grant Project. Specifically, the CCVB will provide the County with up to \$2,500 to support costs related to Remedial Planning or remedial activities at local brownfield sites targeted for redevelopment, if requested.

The CCVB is committed to supporting the County's Assessment Grant Project with our funding and we are excited to learn that we will finally be able to begin to address and improve some of these blighted areas for the benefit of our community.

Very truly yours,



Jason Wilhite
Clinton County Visitors Bureau



**INDIANA UNIVERSITY
KOKOMO**

OFFICE FOR ADVANCEMENT

November 15, 2011

Mr. Shan Sheridan
Executive Director, Clinton County Economic Development
259 East Walnut
Frankfort, IN 46401

RE: FY 2012 U.S. EPA Brownfields Assessment Grant
Community Organization and Leveraging Support

Dear Mr. Sheridan:

Indiana University (IU) Kokomo understands the need to secure local community support and leverage additional funds/resources in order to apply for a U. S. Environmental Protection Agency (EPA) Brownfields Assessment Grant.

IU Kokomo offers over 70 undergraduate and five graduate programs on a regional campus. IU Kokomo is guided by our three themes: Academic Excellence and Student Success, Building Relationships and Making Friends, and Transforming the Region. Graduates of IU Kokomo find employment in business and industry in Kokomo and surrounding communities.

If the grant is awarded, IU Kokomo would be interested in investigating ways our students could get involved with the project. Potential involvement could include students and staff from IU Kokomo's Arts and Sciences and/or Public Affairs and Environmental Science programs taking part in directing ground surveys of the Coalition communities to identify and prioritize developable sites and provide other support as needed. Students may also get involved in developing conceptual redevelopment designs and participate in Brownfields final design to support redevelopment of specific sites or areas. The students would then present their findings to the Coalition members to support the grant project and to their respective IU Kokomo professors/advisors to support their degree requirements. IU Kokomo anticipates that up to 20 students could potentially participate in the grant project. An estimate of 40-50 hours per student might be expected if participating in the project.

IU Kokomo supports the Coalition as it seeks an Assessment Grant and looks forward to working with the Coalition as it identifies and prioritizes the Brownfields that are adversely impacting its communities.

Sincerely,

Penny Lee

Vice Chancellor for Public Affairs and Advancement

ATTACHMENT D

LETTERS FROM COMMUNITY-BASED ORGANIZATIONS



POWER, LITTLE & LITTLE

ATTORNEYS-AT-LAW

C. DAVID LITTLE
JEFFREY P. LITTLE

(765) 654-4340
(765) 654-5015 FAX

Power & Little Law Building
253 North Jackson Street, Frankfort, Indiana 46041
e-mail: powerlittl@accs.net

KENNETH S. POWER
(1909-1997)

November 17, 2011

Mr. Shan Sheridan
Executive Director
Clinton County Economic Development
259 East Walnut Street
Frankfort, IN 46401

RE: Community Support from the Frankfort Mid-West Rail Heritage Trust, Inc.
(FMWRHTI)
U.S. EPA Brownfields Assessment Grant Project
Clinton County, Indiana

Dear Mr. Sheridan:

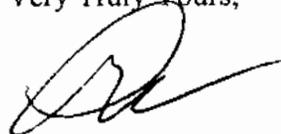
The Frankfort Mid-West Rail Heritage Trust, Inc. whole-heartedly supports your application for two U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grants to assess and promote redevelopment of Brownfield sites within Clinton County.

The Frankfort Mid-West Rail Heritage Trust, Inc. (FMWRHTI) is 501(C) 3 Corporation established over ten years ago dedicated to the preservation and redevelopment of the Frankfort Nickel Plate Roundhouse. We believe the roundhouse redevelopment will be the centerpiece of our community and saving this historic building should be a priority. We also believe that the roundhouse redevelopment will be a catalyst for change in the Frankfort Westside Redevelopment Initiative, improving the quality of life in our county and spurring much-needed economic growth and jobs. Nickel Plate Railroad is very cooperative and has committed to donating 15 acres to this development. The FMWRHTI has worked closely with Frankfort and Clinton County officials to inform and engage citizens in development of a Master Plan for the redevelopment through the OCRA Planning Grant. FMWRHTI believes that this assessment grant will help complete Phase I of the Master Plan and will start the historic preservation and redevelopment of the roundhouse, and will also enable us to tackle other economic challenges within Clinton County.

FMWRHTI's role in the Project will be to assist the County in pursuing additional grants and funding sources for the roundhouse, assist in marketing the site to developers and help the County inform the citizen's of the grant program through our correspondence and website. FMWRHTI will assist the County with community outreach for all

Brownfields within the county, as we realize the best way to save the roundhouse is by improving the economic conditions of the whole community. FMWRHTI is committed to provide its resources to support the County's Brownfield redevelopment efforts.

Very Truly Yours,

A handwritten signature in black ink, appearing to be 'C. David Little', written in a cursive style.

C. David Little
President of the Frankfort Mid-West Rail Heritage Trust, Inc.



Healthy Communities of Clinton County Coalition
Your "Link" to Healthy Living

November 10, 2011

Mr. Shan Sheridan
Executive Director
Clinton County Economic Development
259 East Walnut Street
Frankfort, IN 46401

RE: Community Support from the Healthy Communities of Clinton County Coalition
U.S. EPA Brownfields Assessment Grant Project
Clinton County, Indiana

Dear Mr. Sheridan:

The Healthy Communities of Clinton County Coalition (HCCCC) is excited to support your application for two U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grants to assess and promote redevelopment of Brownfield sites within Clinton County.

The HCCCC has seen first-hand the benefits a grant can have to a community. Through our ACHIEVE grant, which we received through the National Association of Chronic Disease Directors, we have begun to see positive changes being implemented within Clinton County to improve the overall health of our citizens. However, we haven't had the resources or expertise to address the detrimental role that exposure to contaminated sites might be having within our community. We believe that the Brownfield Assessment Grant will greatly assist our efforts in looking at the environment as it affects health and chronic diseases. Our goal is to establish healthy community living in a safe, vibrant community. We are also keenly aware that we must improve some of economic woes to improve the health of the community and safely redeveloping brownfields will eliminate risks that are widely unknown at this time and provide new job opportunities.

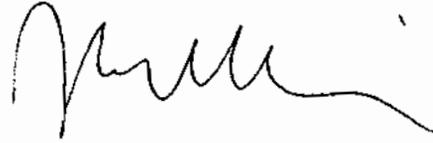
The HCCCC's role in the Project will be to assist the County in community outreach and education through our existing programs. In addition, we plan on coordinating our efforts with the County's brownfield programs in order to dovetail our programs such as the "Safe Routes to School" initiative. We strongly believe that through this type of cooperation we will both be able to leverage our available funding to accomplish far more of our goals.

Partners working along with HCCCC include, but are not limited to St. Vincent Frankfort Hospital and St. Vincent Health in Indianapolis, the Indiana State Department of Health, Purdue University Extension, all four county school districts, Clinton County YMCA, Clinton County Board of Health, American Cancer Society, American Lung Association, Indiana Joint Asthma Coalition and many many others.

Sincerely,

Handwritten signature of Carol J. Price in cursive script.

Carol J Price, Coordinator

Handwritten signature of Kelly Peisker in cursive script.

Kelly Peisker, Co-Chair



**INDIANA UNIVERSITY
KOKOMO**

OFFICE FOR ADVANCEMENT

November 15, 2011

Mr. Shan Sheridan
Executive Director, Clinton County Economic Development
259 East Walnut
Frankfort, IN 46401

RE: FY 2012 U.S. EPA Brownfields Assessment Grant
Community Organization and Leveraging Support

Dear Mr. Sheridan:

Indiana University (IU) Kokomo understands the need to secure local community support and leverage additional funds/resources in order to apply for a U. S. Environmental Protection Agency (EPA) Brownfields Assessment Grant.

IU Kokomo offers over 70 undergraduate and five graduate programs on a regional campus. IU Kokomo is guided by our three themes: Academic Excellence and Student Success, Building Relationships and Making Friends, and Transforming the Region. Graduates of IU Kokomo find employment in business and industry in Kokomo and surrounding communities.

If the grant is awarded, IU Kokomo would be interested in investigating ways our students could get involved with the project. Potential involvement could include students and staff from IU Kokomo's Arts and Sciences and/or Public Affairs and Environmental Science programs taking part in directing ground surveys of the Coalition communities to identify and prioritize developable sites and provide other support as needed. Students may also get involved in developing conceptual redevelopment designs and participate in Brownfields final design to support redevelopment of specific sites or areas. The students would then present their findings to the Coalition members to support the grant project and to their respective IU Kokomo professors/advisors to support their degree requirements. IU Kokomo anticipates that up to 20 students could potentially participate in the grant project. An estimate of 40-50 hours per student might be expected if participating in the project.

IU Kokomo supports the Coalition as it seeks an Assessment Grant and looks forward to working with the Coalition as it identifies and prioritizes the Brownfields that are adversely impacting its communities.

Sincerely,

Penny Lee
Vice Chancellor for Public Affairs and Advancement

November 4, 2011

Mr. Shan Sheridan
Executive Director
Clinton County Economic Development
259 East Walnut Street
Frankfort, IN 46401

RE: Community Support for U.S. EPA Brownfields Assessment Grants
Clinton County, Indiana

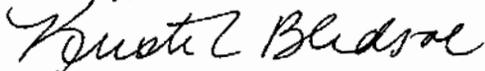
Dear Mr. Sheridan:

The Clinton County Chamber of Commerce (CCCOC) is pleased to support your application for two FY2012 U.S. Environmental Protection Agency (U.S. EPA) Brownfields Assessment Grants to assess and promote redevelopment of brownfield sites within Clinton County.

As you know, the CCCOC is a community resource that assists and strengthens local businesses by providing advertising and networking opportunities, as well as hosting educational seminars. The CCCOC's role in the Assessment Grant Project will consist of coordinating with local governmental units, promoting inter-governmental collaboration, and hosting community economic development forums, advertising the grant program, and helping entrepreneurs in accessing and utilizing the grant funds.

The CCCOC is committed to improving regional economic conditions, and will provide its resources to support Clinton County's brownfield redevelopment efforts.

Sincerely,



Kristi Bledsoe
President Clinton County Chamber of Commerce



Purdue Extension's Learning Network of Clinton County
1111 S. Jackson St., Frankfort, IN 46041
(765) 659-6380
www.LNOCC.org

November 4, 2011

Mr. Shan Sheridan
Executive Director
Clinton County Economic Development
259 East Walnut Street
Frankfort, IN 46401

RE: Community Support from the Purdue Extension's Learning Network of Clinton County
U.S. EPA Brownfields Assessment Grant Project
Clinton County, Indiana

Dear Mr. Sheridan:

The Purdue Extension's Learning Network of Clinton County (PELN) is pleased to support your application for two U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grants to assess and promote redevelopment of Brownfield sites within Clinton County.

Our organization, in partnership with the Indiana Minority Health Coalition, works closely with the Latino population of Clinton County through many educational, workforce development, training, and health programs. The PELN recognizes the opportunity the Brownfield Assessment Grant represents to assist in our efforts to improve the lives and livelihoods of the residents of Clinton County. Assessment and redevelopment of these blighted properties will protect residents from health-threatening exposures, provide job-creation and economic stability, and improve the overall welfare of our neighborhoods.

The PELN's role in this project will be to assist the County in community outreach and education through our existing programs and publications by serving as a liaison between the County and the Latino community (which now makes up about 35% of the population, using the statistics of the Community Schools of Frankfort). If asked, PELN staff can provide interpretation services at meetings and for public announcements. In addition, we can publish information in our bilingual newsletter, *ComunitariaNews*. We understand that \$2,000 will be budgeted in the grant request to cover the cost of staff time (for interpretation) and publication (translation) costs. PELN also envisions playing a role in assisting new employers to find and train qualified employees as part of our workforce development programming that already exists here in collaboration with Work One Frankfort. The PELN is excited to be a community partner with you on this critical endeavor.

Sincerely,

Melinda Grismer
Extension Educator, Economic & Community Development
Coordinator, Purdue Extension's Learning Network
1111 S. Jackson St., Frankfort, IN 46041
(765) 659-6380 (office)/(765) 659-6382 (fax)
mgrismer@purdue.edu

Purdue Extension
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topics at the *Purdue Extension Education Store*.

www.ces.purdue.edu/new

ATTACHMENT E
SPECIAL CONSIDERATIONS CHECKLIST



Appendix 3 Special Considerations Checklist

Please identify (with an **X**) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection of the grant.

- Community population is 10,000 or less
- Federally recognized Indian tribe
- United States territory
- Applicant assisting a Tribe or territory
- Targeted brownfield sites are impacted by mine-scarred land
- Targeted brownfield sites are contaminated with controlled substances
- Community is impacted by recent natural disaster(s)
- Project is primarily focusing on Phase II assessments
- Community demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation
- Community experiencing plant closures (or other significant economic disruptions), including communities experiencing auto plant closures due to bankruptcy
- Applicant is a recipient of a HUD/DOT/EPA Partnership for Sustainable Communities grant