

Funding Opportunity Number: EPA-OLEM-OBLR-25-05

1. Applicant:

Bluegrass Area Development District
699 Perimeter Drive #100
Lexington, KY 40517

R04-26-A-063

2. Website:

URLs for lead and non-lead members:

- a. BGADD (lead): <https://www.bgadd.us>
- b. City of Paris: <https://www.paris.ky.gov/>
- c. Estill County: <https://estillky.com/>

3. Funding Requested:

- a. Assessment Grant Type: Assessment Coalition
- b. Federal Funds Requested: \$1,500,000

4. Location:

Cities of Millersburg, Paris, and Irvine, Kentucky

5. Coalition Members' Target Areas and Priority Site Information: *A map to visually depict the target areas is attached.

- a. *Paris, Kentucky (City of Paris – Coalition Non-Lead Member)*

Priority Site 1: Former Waste Transfer Station

1004 Stewart Street, Paris KY 40361

Census Tract 21017030100

Priority Site 2: Gano Street Landfill

Gano Street, Paris KY (38.21717,-83.2607)

Census Tract 21017030100

- b. *Irvine, Kentucky (Estill County – Coalition Non-Lead Member)*

Priority Site 1: Coal Washing Facility:

Coal Wash Road, Irvine KY 40336 (37.72307,-84.00024)

Census Tract 21197970200

Priority Site 2: Former Broadway Garage

1911 Broadway St, Irvine KY 40336

Census Tract 21065920200

- c. *Millersburg, KY (Bluegrass Area Development District – Coalition Lead Member)*

Priority Site 1: Former Millersburg Military Institute Campus

1025 Main Street, Millersburg KY 40348

Census Tract 21017030500

Priority Site 2: Water Treatment Plant

302 West 2nd Street, Millersburg KY 40348

Census Tract 21017030500

Priority Site 3: Vacant Land

504 Miller Street, Millersburg KY 40348
Census Tract 21017030500

6. Contacts:

- a. Project Director
David Duttlinger
Executive Director, Bluegrass Area Development District (BGADD)
mailing address: 699 Perimeter Drive, Lexington, KY 40517
e-mail: dduttlinger@bgadd.org, phone: 859-489-4921
- b. Chief Executive/Highest-Ranking Elected Official
David Duttlinger
Executive Director, Bluegrass Area Development District (BGADD)
mailing address: 699 Perimeter Drive, Lexington, KY 40517
e-mail: dduttlinger@bgadd.org, phone: 859-489-4921

7. Population:

TARGET AREA 1: City of Paris: 10,171 (2020 Decennial Census)
TARGET AREA 2: City of Irvine: 2,360 (2020 Decennial Census)
TARGET AREA 3: City of Millersburg: 747 (2020 Decennial Census)

8. Other Factors:

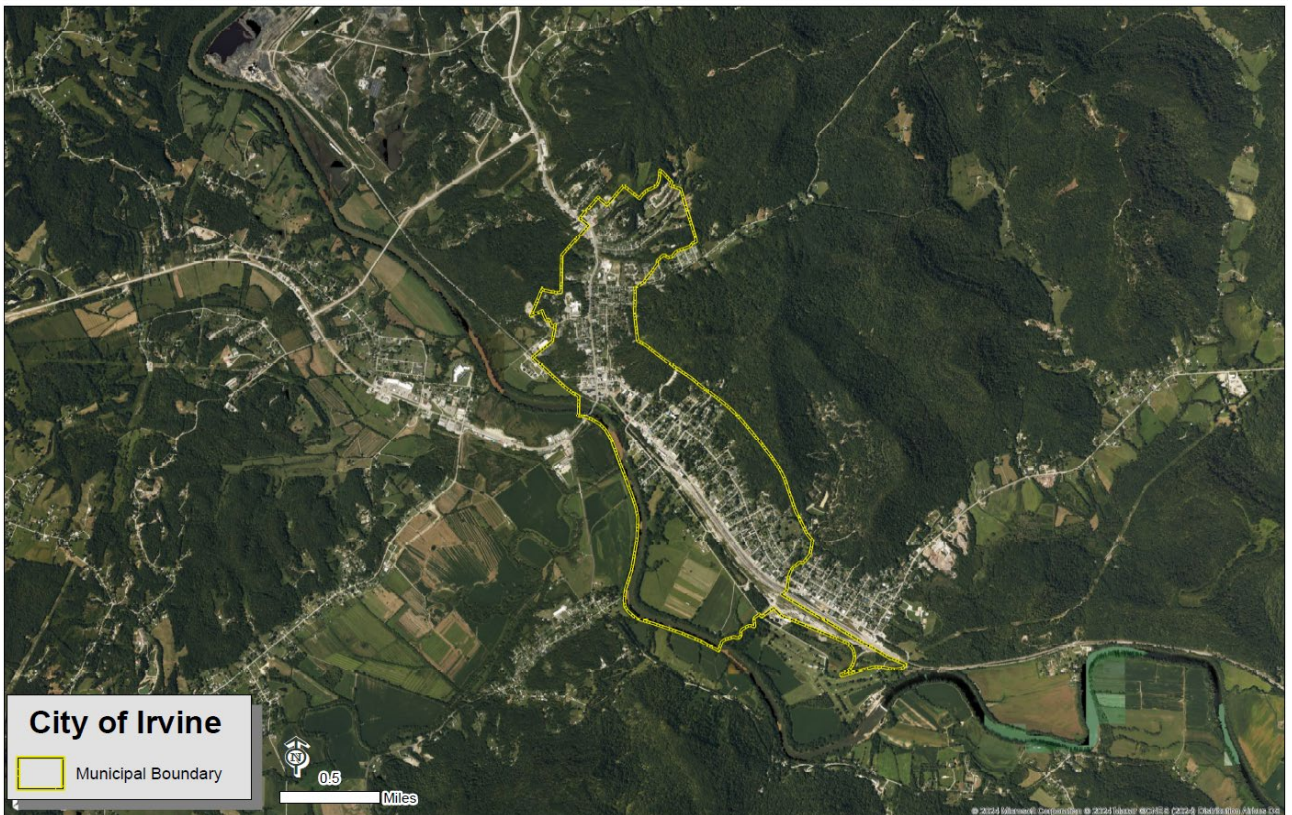
Other Factors	Page #
Community population is 15,000 or less.	7 (section 2a)
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	n/a
The priority site(s) is impacted by mine-scarred land.	1-3 (sections 1b & 1c)
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1-3 (section 1b & 1c)
The priority site(s) is in a federally designated flood plain.	2-3 (section 1c)
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	2, 4-5 (sections 1c, 1e, & 1f)
The reuse of the priority site(s) will incorporate energy efficiency measures.	4-5 (section 1f)
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	4-5 (section 1f)
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section 3.A.(2) , for priority sites within the target areas.	11 (section 3e)
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	n/a

9. Letter from the State or Tribal Environmental Authority:

A letter of acknowledgement and support from the Kentucky Brownfields Coordinator is attached.

10. Releasing Copies of Applications:

N/A





Andy Beshear
GOVERNOR

ENERGY AND ENVIRONMENT CABINET
DEPARTMENT FOR ENVIRONMENTAL PROTECTION

300 Sower Boulevard
Frankfort, Kentucky 40601
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Rebecca Goodman
SECRETARY

Anthony R. Hatton
COMMISSIONER

January 7, 2026

David Duttlinger
Executive Director
Bluegrass Area Development District
699 Perimeter Dr. #100
Lexington, KY 40517

Re: Letter of Support for FY26 Brownfield Assessment Coalition Grant

Dear Mr. Duttlinger:

The Kentucky Department for Environmental Protection (DEP) is supportive of, and committed to, the work of the coalition formed by the Bluegrass Area Development District, the City of Paris, Estill County, Community Ventures, and the City of Millersburg to identify and assess brownfield sites in the community. DEP is the state agency charged by the legislature with the responsibility of implementing the Kentucky equivalent of the federal Superfund program, and as such, is an essential component of any attempt to systematically address brownfields redevelopment. We support your application for a FY26 Brownfield Assessment Coalition Grant and look forward to continuing our work with your community on this important issue.

Sincerely,

A handwritten signature in cursive script that reads "Kiersten O'Leary".

Kiersten O'Leary
Brownfield Coordinator

Cc: Kenneth Logsdon, Division of Waste Management
Richard Thomas, Division of Waste Management, Frankfort Regional Office
Logan Hart, Bluegrass Area Development District

FY26 Assessment Coalition Grant

1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1a. Coalition members: The Bluegrass Area Development District (BGADD) leads the Brownfields Assessment Coalition in partnership with the City of Paris and Estill County as non-lead coalition members. BGADD's regional mission focuses on revitalizing underutilized and environmentally impaired properties to foster sustainable redevelopment and improve quality of life across its 17-county service area in Kentucky. Two of these counties, Bourbon and Estill, are represented in the target area through the participation of the City of Paris and Estill County. While the city and county demonstrate strong grassroots commitment to redevelopment and environmental improvement, they face limited administrative and technical capacity to independently pursue and manage complex federal programs such as the EPA Brownfields Assessment Coalition Grant (EPA Grant). Neither has dedicated staff with specialized experience in federal grant administration, environmental assessment, or compliance reporting. As the lead coalition member, BGADD bridges this capacity gap by providing technical assistance, fiscal management, and regulatory compliance oversight. This collaborative framework strengthens local readiness, builds long-term capacity for redevelopment, and advances economic stability throughout the region. This FY26 application marks the coalition's third consecutive effort to secure EPA Brownfield funding, a reflection of 3 years of sustained planning, partnership building, and community engagement. The coalition's persistence demonstrates its deep commitment to transforming contaminated and underutilized properties into catalysts for environmental resilience, equitable redevelopment, and economic growth.

1b. Overview of Brownfield Challenges and Description of Target Areas: Although the coalition members are in separate cities and counties within BGADD's region, their residents share the same visionary goals to advance health, economic, and environmental vitality for their communities lacking resources and burdened by job loss and pollution by job loss and pollution. The geographic boundary for this grant is the BGADD region itself, which is a 17-county area in central Kentucky. This area encompasses varied land use from urban areas of Lexington to the rural surrounding counties. The target areas are defined as: **The City of Paris Target Area: Paris** (census tract 21017030100), a small rural community northeast of Lexington in Bourbon County, focused on redeveloping its historic core, an area with a legacy of environmental hazards that disproportionately impacted the residents. Paris continues to suffer population decline that initially resulted from the 2008 recession and continued with significant manufacturing job loss in the late 20th century (US Census). Compounding these socioeconomic challenges are long-standing flooding issues associated with Stoner Creek and Houston Creek, which traverse low-lying portions of the city and routinely overtop during heavy rain events. Recurrent flooding has damaged infrastructure, limited private investment, and increased environmental risk by mobilizing contaminants from legacy industrial and waste disposal sites located within designated floodplains. In 1965, a city incinerator was placed in the Westside neighborhood near Riverside Park, a key community space situated along Houston Creek, exposing residents to decades of noise, air pollution, and emissions while also placing waste handling operations directly within a flood-prone corridor. During high water events, floodwaters have the potential to transport contaminants downstream and into adjacent residential areas, increasing exposure risks for nearby households. Adding to these challenges, the Gano Street landfill, a former quarry located within the same watershed and floodplain, represents an additional source of contaminant migration during storm events. Years of underinvestment, combined with flood-related constraints on redevelopment, have left this part of Paris economically vulnerable and environmentally impacted. With limited local resources, the City of Paris requires EPA Brownfields funding to assess floodplain impacted sites, reduce environmental risk, and support resilient redevelopment strategies that restore Riverside Park, protect public health, and rehabilitate the community's long-term climate and economic resilience. **The Estill County Target Area: Irvine** (census tract 21197970200), nestled in the heart of rural Appalachia along the Kentucky River, is defined by extensive mine-scarred land resulting from decades of coal extraction, processing, cleaning, and sorting. For generations, Irvine's residents endured the disproportionate burden inherent in primary coal extraction, pollution, land degradation, and health risks that became a daily reality. The end of coal production brought with it a swift economic decline, shutting not only the mines but also small businesses, retail stores, gas stations, and other essential services that had sustained the local economy. From 2012 to 2019, the number of coal jobs dropped by over 60% (US Census). Today, the small community of Irvine grapples with hundreds of acres of mine-scarred landscapes and forgotten

piles of spent coal materials that continue to impact the community. With a population decline of over 8% since 2010 due to job loss (US Census), Irvine cannot afford to address these brownfield sites and lingering contamination. This area also lacks affordable housing. Despite these challenges, Irvine’s downtown and riverfront areas possess striking potential for economic revitalization. With support from the coalition, Irvine seeks to reclaim and transform these blighted areas, fostering sustainable redevelopment for renewed community life. This effort represents a critical step for Irvine’s residents, who envision a future that celebrates their resilience and the natural beauty of their Appalachian home. The **BGADD Target Area: Millersburg** (census tract 21017030500) is a small rural community in Bourbon County with a rich agricultural and manufacturing heritage that served as the backbone of the town's economy for generations. In the 20th century, as farming declined and younger generations moved away, Millersburg's industrial landscape shifted toward manufacturing. The town was home to Joy Global (formerly Stamler), a manufacturer of mining equipment. In 2013, Joy Global closed its Millersburg facility, leaving 200 local employees without jobs. The population has been in gradual decline since 1990 because of job loss. As a small community with limited resources, the town also endured disproportionate hazards, notably from poorly maintained infrastructure and inadequate waste management practices, impacting both residential areas and farmland. In 2022, a large fire in its historic downtown destroyed several key buildings, exacerbating blight and reducing the area's economic vitality. Today, Millersburg grapples with the legacy of job loss, lack of affordable housing, environmental degradation, and community displacement, leaving scars on both the physical landscape and community spirit. Although the community is resilient, Millersburg requires coalition partnership to assess environmental challenges, support sustainable redevelopment, and reconnect the town with its heritage while building a stronger future for residents.

1c. Description of Priority Brownfield Sites: Area-wide environmental inventories were completed in the three target areas, and a total of 16 brownfield sites were identified. From these properties, each coalition member selected two priority sites based upon the property’s location, suspected presence of environmental contamination, potential impacts to human health and the environment, suitability for planned reuse, and current vacant status, which increases the potential for timely redevelopment. The priority sites are listed below:

Priority Site # Address	Description	Contaminants of Concern
City of Paris		
Priority Site 1: 1004 Stewart St CT 21017030100 *federally designated flood plain	History: The site was historically Riverside Park before the city constructed a municipal incinerator and later operated a waste transfer station on about 25 acres in the Westside neighborhood. The site is bordered on three sides by Houston Creek, lies within a federally designated 100-year floodplain, and is in a residential area. Reuse: Public greenspace to restore Riverside Park, with senior housing on appropriate portions of the property to support community needs and compatible redevelopment.	Polychlorinated dioxins and dibenzofurans (PCDD/Fs), heavy metals, polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), volatile organic compounds (VOCs), ash residue, asbestos, per- and polyfluoroalkyl substances (PFAs), pathogens /biological hazards, mold/ fungal spores, hydrocarbons, oil
Priority Site 2: Gano St 38.21717, -83.2607 CT 21017030100 *federally designated flood plain	History: The site began as a rock quarry and was converted to the City of Paris landfill in 1965. The 4.1-acre site contains waste deposits up to 30 feet deep and is adjacent to Houston Creek in a residential area. Reuse: Public greenspace with passive recreation and environmental buffers along Houston Creek, with evaluation of solar features to support renewable energy and long-term site safety.	Leachate contaminants, methane, heavy metals, asbestos, PCBs, PFAs, pathogens /biological waste, polyvinyl chloride (PVC)
City of Irvine		
Priority Site 1: Coalwash Rd 37.72307,-84.00024 CT 21065920200 *federally designated flood plain	History: The site is a former 500-acre coal washing facility along the Kentucky River within a 500-year floodplain. Past coal processing activities left multiple steel-framed industrial structures, many of which remain structurally sound but are vacant and subject to trespassing. Reuse: Adaptive reuse of existing structures for commercial, light industrial,	PAHs, heavy metals, acid mine drainage (AMD), petroleum hydrocarbons, chemical flocculants /surfactants

or small manufacturing uses, with undeveloped areas evaluated for housing and open space using flood-resilient design and improved site security.

Priority Site 2: 1911 Broadway St CT 21065920200	History: The site is a former vocational training facility used for auto repair and mechanics instruction on about 1 acre parcel, now vacant. Reuse: Renewed vocational and workforce training programs to address educational gaps and support local employment and Irvine’s long-term economic resilience.	Petroleum hydrocarbons, underground storage tanks (USTs), VOCs, semi-volatile organic compounds (SVOCs), heavy metals, PAHs, asbestos, lead-based paint, PCBs, solvents, degreasers
City of Millersburg		
Priority Site 1: 1025 Main St CT 21017030500	History: The site was formerly the Millersburg Military Institute, a historic 21-acre educational campus founded in 1878 that operated as a military boarding school before experiencing long-term vacancy and deterioration. Reuse: Mustard Seed Hill, a mixed-use community destination with a primary purpose of providing senior housing.	Lead-based paint, asbestos, heavy metals, PCBs.
Priority Site 2: 302 West 2 nd St CT 21017030500 *federally designated flood plain	History: The site is a 1960s-era water treatment plant on an about 0.5 acre that served Millersburg until operations ceased following acquisition by Kentucky American Water. It is in a residential area adjacent to the South Fork Licking River near Main Street, with prior site use unknown and historic aerials indicating potential past disturbance. Reuse: Compatible with nearby residential uses and proximity to the river and downtown, potentially including greenspace, river-adjacent open space, or community-serving uses to enhance environmental safety and connectivity.	Chlorine, heavy metals, PFAs, VOCs, PAHs, Petroleum Hydrocarbons
Priority Site 3: 504 Miller St CT 21017030500	History: The site is a vacant 1-acre parcel in a residential area jointly owned by the City of Millersburg and TI Railroad. Prior use is unknown, but proximity to active rail infrastructure indicates potential environmental concerns. Reuse: The site is a vacant approximately one-acre parcel in a residential area jointly owned by the City of Millersburg and TI Railroad. Prior use is unknown, but proximity to active rail infrastructure indicates potential environmental concerns.	Herbicides, pesticides, arsenic, chlorinated pesticides, heavy metals, PCBs, PAHs, dioxins/furans, diesel & petroleum residues

**Source for flood plain designation: FEMA flood map service center*

1d. Identifying Additional Sites: BGADD and non-lead members have identified 10 additional sites in the target areas of Paris, Irvine, and Millersburg that have been prioritized to advance health, economic, and environmental vitality in impoverished populations:

Target Area	Site Address	Description
City of Paris	21 Ardery Place	McGuffey Schoolhouse; historical early 1800s brick building
City of Paris	137 West 7 th Street	Former Bourbon Laundry building
City of Paris	219 East 19 th Street	Bourbon County Recycling Center closing in 2024
City of Paris	301 Pleasant Street	Historic building located in downtown Paris historic district
City of Irvine	799 Kirkland Ave	Estill Co IDA-owned property with multiple former uses including garment, boat assembly, and biofuel production
City of Irvine	1225 Pryse Road	Former site of Texola oil refinery, also used for bulk storage
City of Irvine	369 Carhartt Ave	Former railroad right-of-way with steam locomotive operations
City of Millersburg	201 Main Street	Residential land adjacent to an automotive repair shop with known contaminants of concern
City of Millersburg	306 Main Street	Abandoned gas station owned by a non-profit wishing to locate a farmer’s market on the site
City of Millersburg	501 Trigg Street	Commercial site with junkyard on premises that store coal mining equipment

The coalition Advisory Board will continue to inventory additional sites to support providing 21 Phase I ESAs under this EPA Grant. Prioritization of additional sites will focus primarily on the grant target areas but those in the project geographic area may also be considered. Each potential site will be evaluated using a consistent set of criteria, including community impact, economic impact, environmental risk, and flood risk and resilience. This structured evaluation process ensures transparent and equitable decision-making while aligning site selection with the coalition's redevelopment, public health, and climate resilience goals.

1e. Reuse Strategy & Alignment with Revitalization Plans: The coalition's reuse strategy advances adopted revitalization plans in Paris, Irvine, and Millersburg by linking brownfield redevelopment to public health, housing stability, economic recovery, and environmental sustainability. In **Paris**, redevelopment of the former incinerator and waste transfer station (Priority Site 1) aligns with the [West Side Neighborhood Strategic Action Plan](#), [Envision Bourbon County 2040](#), and Pillars 1 (Clean Air, Land, and Water for Every American), 2 (Restore American Energy Dominance), and 3 (Permitting Reform, Cooperative Federalism, and Cross-Agency Partnership) of EPA's Powering the Great American Comeback (PGAC) initiative which prioritize environmental remediation, expanded greenspace, improved public health, and reinvestment in historically disinvested neighborhoods. Priority Site 2, located in the same West Side neighborhood, complements this effort as a coordinated greenspace and renewable energy opportunity. The City of Paris has collaborated with EPA OBLR, EPA Region 4, and the Kentucky Brownfield Program to advance assessment, cleanup planning, and financial feasibility for parkland and senior housing reuse, supported by ICMA Technical Assistance to Brownfields and the City's Pathway to Progress framework. In **Irvine**, Estill County's reuse strategy leverages existing rail and river infrastructure at Priority Sites 1 and 2 to support commercial reuse, small manufacturing, light industry, data centers consistent with the 2023 City of Irvine Comprehensive Plan and Pillars 1, 2, 3, and 4 (Make the United States the Artificial Intelligence Capital of the World) of EPA's PGAC initiative. These sites are positioned to support mixed-use redevelopment that include affordable, energy-efficient housing, commercial space, green areas, and river-oriented amenities. Irvine's strategy is reinforced by youth-focused placemaking through the Estill Pathfinder Initiative Coalition and long-term sustainability investments, including renewable energy generation at Lock and Dam 12 and expanded vocational training opportunities at the Broadway Street site. In **Millersburg**, reuse planning is aligned with Envision Bourbon County 2040, the City's response to long-term job loss following the closure of Joy Global, and Pillars 1, 2, and 3 of EPA's Powering the Great American Comeback (PGAC) initiative. Priority Sites 1 and 3 address critical housing needs through senior-focused housing and nonprofit-led affordable housing, supporting population stability, aging in place, and workforce retention. These housing strategies complement Community Ventures' ongoing investment in historic preservation, downtown revitalization, and mixed-use redevelopment, ensuring housing growth is integrated with economic recovery. Priority Site 2 further advances Millersburg's revitalization goals through evaluation of a small manufacturing incubator, expanding local employment opportunities and supporting long-term economic resilience. Together, these reuse strategies reinforce each community's comprehensive plans while advancing the coalition's shared goals of equitable redevelopment, housing access, and sustainable economic growth.

1f. Outcomes & Benefits of Reuse Strategy: The coalition's reuse strategy leverages targeted redevelopment efforts in Paris, Irvine, and Millersburg to promote measurable economic revitalization, job creation, and community wellness, aligning with each city's comprehensive revitalization goals. In **Paris**, the brownfield inventory tracker developed with ICMA TAB supports strategic site management and strengthens the City's ability to pursue revitalization funding. Community engagement in the Westside neighborhood identified a strong need for recreational space, environmental restoration, and reduced industrial impacts. As a result, reuse planning for Priority Site 1, the former incinerator site, focuses on converting approximately 25 acres into reclaimed greenspace that supports public health, flood resilience, and neighborhood revitalization. Concept plans developed through a National Park Service grant emphasize native landscaping and riparian buffers along Houston Creek to reduce stormwater runoff and restore ecological function. Priority Site 2, the Gano Street Landfill, is similarly planned for conversion to passive greenspace following assessment and remediation. Reuse of this former quarry and landfill will reduce exposure to legacy contamination, limit development in a flood-prone area, and expand connected open space within the Westside neighborhood. Across both sites, reuse plans include solar opportunities and energy-efficient lighting, advancing renewable energy goals while reducing urban

heat and improving long-term climate resilience and quality of life for residents. In **Irvine**, Estill County’s reuse strategy aims to revitalize sites near existing rail infrastructure, promoting adaptive commercial reuse for data centers, small manufacturing and light industry that incorporates solar and potential geothermal energy installations to offset energy costs. Community feedback emphasized the need for local job opportunities to mitigate the area’s high commuting burden, with 52% of workers traveling over 30 minutes to work and the community ranking above the 92nd percentile for transportation barriers. Adaptive reuse plans include affordable, energy-efficient housing, benefiting a community in the 89th percentile for low-income. Plans also incorporate green infrastructure, such as bioswales, rain gardens, and runoff management with Berea College, furthering extreme weather resilience and water quality. This mixed-use redevelopment will include a river walk for recreation in a community with significant health challenges, with Irvine ranking in the 95th percentile for heart disease. The reuse strategy for **Millersburg** focuses on long-term economic stability and growth while strengthening resilience to extreme weather events. Where feasible, structures will be preserved and retrofitted with energy-efficient systems, maintaining architectural heritage while reducing energy consumption. Solar energy potential and renewable energy installations will be explored to power these repurposed spaces and improve energy reliability during severe weather events. By stabilizing historic structures, improving utility capacity, and reinforcing existing infrastructure, Millersburg aims to reduce vulnerability to flooding, support emergency response continuity, attract new businesses, and mitigate the long-term impacts of Joy Global’s closure. Community Ventures play a central role by investing in the town’s historic and commercial areas, diversifying local economic opportunities and reducing dependency on any single industry. Collectively, these reuse strategies reduce flood risk, manage stormwater, strengthen infrastructure, and improve climate resilience across all three target areas.

1g. Resources Needed for Site Reuse: The coalition’s reuse strategy draws on a diverse array of already secured financial, technical, and community resources to enhance brownfield redevelopment, promote economic growth, and strengthen environmental and social resilience:

Target Area	Leveraged Resource	Value	How Resource Supports or Complements the Project
Paris	HUD Community Development Block Grant (CDBG)	\$2,000,000	Supports relocation of the former incinerator and waste transfer station, enabling assessment, cleanup, and redevelopment of the priority site
Paris	Kentucky House Bill 1	\$1,500,000	Provides funding for site cleanup following assessment
Paris	EPA Region 4 Brownfields	\$321,000	Funded Phase II environmental site assessment to characterize contamination
Paris	Hunt Brothers (Local Business)	\$100,000	Local financial commitment supporting redevelopment readiness
Paris	EPA Office of Brownfields and Land Revitalization (OBLR)	\$50,000	Provided technical assistance for community engagement and preliminary market and financial feasibility analysis
Paris	ICMA TAB	\$40,000	Supported development of a city-wide brownfield inventory and community engagement website
Paris	National Park Service (NPS)	\$13,000	Provides master planning and greenspace design assistance to support reuse planning
Paris	KDEP Energy & Environment Cabinet	\$10,000	Provides technical assistance related to site assessment and cleanup coordination
Irvine	EPA Brownfields Cleanup Grant	\$4,999,520	Cleanup funding supporting adaptive reuse of a rail-adjacent brownfield catalyst site
Irvine	Estill County and Local Government Partners	In-kind	Support planning and implementation of adaptive reuse for rail-adjacent and industrial sites
Irvine	Berea College	In-kind	Supports climate resilience through green infrastructure and stormwater management improvements
Millersburg	Kentucky American Water	\$18,000,000	Infrastructure investment supporting future residential and commercial growth
Millersburg	HUD Community Development Block Grant (CDBG)	\$750,000	Supports stabilization of historic downtown structures and complements brownfield redevelopment efforts

Millersburg Community Ventures (CV)	Financial and in-kind	Supports affordable housing, historic rehabilitation, and commercial redevelopment
Millersburg Community Ventures Mustard Seed Hill Project	Ongoing investment	Supports mixed-use redevelopment and tourism activity that

Additional sources of funding will be obtained through the following (note *= all sites):

- **Kentucky 415 Program (State Brownfield Program):** Offers liability protection to encourage cleanup and redevelopment of contaminated properties, supports projects by reducing legal risks for developers. *
- **KDWM Superfund Branch Tax Incentive Program:** Offers 95% reduction in state property/ad valorem tax and up to \$150k in income tax credits for brownfield cleanup costs for up to 10 successive years. *
- **The Economic Development Administration Economic Adjustment Assistance:** Funds job-creating projects in economically distressed communities with funds for coal-impacted communities. (Irvine Sites)
- **Private Investment:** Private developers can use this brownfield assessment grant to guide cleanup strategies, estimate costs, and leverage incentives to support diverse, goal-aligned redevelopment investments. *
- **USDA Rural Business Loans and Grant:** Provides loans for small business incubation, equipment and supplies. (Priority Site 5; All Non-Priority Sites)
- **USEPA Brownfield Cleanup Grants:** Funds remediation of contaminants. Government and non-profits are eligible to apply. *
- **Cleaner Commonwealth Fund:** Low interest/partially forgivable loans for brownfield cleanup through the EPA-funded revolving loan fund. *
- **HUD Community Development Block Grant:** Economic development and housing projects are eligible as they will benefit low to moderate income persons and/or eliminate slums and blight. (Priority Sites 3,6; Non-Priority Site 201 Main Street, Millersburg, KY)
- **KDEP Small Operators Tank Removal Account:** State reimbursement fund for removal of orphan regulated UST systems (Priority Site 4; Non-Priority Sites 1225 Pryse Street, Irvine KY; 306 Main Street, Millersburg, KY).
- **NPS Land and Water Conservation Grant:** Provides funding for outdoor recreation facilities. (Priority Sites 1,2,3)
- **Community Development Block Grant (CDBG):** CDBG funding is available to eliminate slum and blight and serve low to moderate income communities. (Priority Sites 3,6; Non-Priority Site 201 Main Street, Millersburg, KY)
- **Appalachian Regional Commission (ARC):** Distressed areas are eligible for ARC funding as the strategic Plan is to redevelop and repurpose unused, underutilized, or neglected sites, brownfields, to fuel economic development. (Irvine Sites)
- **Abandoned Mine Lands Economic Revitalization (AMLER) Program:** Offers grants to enhance economic recovery and diversity to coal impacted areas. (Irvine Sites)
- **Kentucky Infrastructure Authority (KIA) Cleaner Water Fund:** American Rescue Plan Act funding to provide clean drinking water and improve water systems for communities across Kentucky. *

1h. Use of Existing Infrastructure: All target areas contain priority sites with existing water, sewer, electric, broadband, and transportation infrastructure that can readily support assessment, cleanup, and reuse activities. In Paris, existing utilities support conversion of brownfield sites into reclaimed parkland and greenspace. In Irvine, rail access, existing structures, and county-supported utilities position the former coal wash site for mixed-use redevelopment, with supplemental infrastructure and green infrastructure improvements, such as bioswales and rain gardens, incorporated to enhance flood resilience. In Millersburg, existing downtown infrastructure supports planned housing and commercial reuse, reinforced by an \$18 million Kentucky American Water investment to upgrade water capacity and support future residential and economic growth. BGADD will coordinate infrastructure use and planning with local partners, ensuring redevelopment efforts to enhance climate resilience, support economic revitalization, and maximize the use of existing public investments.

2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:

2a. The Community's Need for Funding: The need for resources in the target areas exceeds available funding. The target area towns lack the funding due to their small, low-income population. The median household incomes of the target areas are half and, in some cases, less than half that of the nation's median household income, while their poverty rates are more than double. Adults with less than a high school education is higher than the national average and double the national average in some cases. This EPA Grant will address a crucial funding gap, enabling the identification of priority catalyst sites to attract further funds for remediation and adaptive

redevelopment. Currently, neither lead nor non-lead coalition members have dedicated funding for brownfield assessment or community engagement. Vacant buildings and falling property values strain municipal budgets, and census data shows high levels of economic distress with low incomes and high poverty rates. These conditions reduce the local tax base, resulting in lower discretionary income, limited spending, and reduced revenues for local businesses and taxes. Statistics exceeding state and national averages are bolded and shaded in the tables below.

Economic Indicators of Need	Paris	Irvine	Millersburg	Kentucky	USA
Population	10,171	2,360	747	4,526,154	334,914,895
Poverty Rate	16.8%	27.8%	25.8%	16.4%	12.6%
Median Household Income	\$46,464*	\$36,292	\$43,558*	\$60,183*	\$74,755*
Adults with no HS degree	16.6%**	19.8%	26.6%	10.7%*	10.3%*

Source: US Census Bureau 2019-2023 American Community Survey 2023 Data, * indicates a decrease since last year **indicates an increase since last year

2b. Health or Welfare of Sensitive Populations: Paris, Irvine, and Millersburg face significant environmental threats that disproportionately impact vulnerable populations, with higher poverty, disability, young children, and senior rates than state and national averages. Children, seniors, and people with disabilities are particularly susceptible to pollution's harmful effects. In Paris, contaminants from waste transfer and former landfill sites raise respiratory risks. Irvine's groundwater and soil are threatened by residual coal by-products from a former washing facility. Millersburg's historic properties contain asbestos and lead, posing risks to children and seniors. Planned brownfield site remediation and redevelopment, including greenspaces and enhanced water systems, will be essential for reducing these risks and promoting healthier, safer communities. Statistics exceeding state and national averages are bolded and shaded in the tables below.

Sensitive Population	Paris	Irvine	Millersburg	Kentucky	USA
Poverty Rate	16.8%	27.8%	25.8%	16.4%	12.6%
Disabled Under 65	17.7%	15.2%	13.4%	12.9%	8.6%
Age 5 or Under	7.04%	7.54%	2.99%	5.7%	6.0%
Age 65 or Older	17.8%	17.93%	15.95%	17.03%	16.84%

Source: US Census Bureau 2018-2022 American Community Survey 5-Year Estimates

2c. Greater Than Normal Incidence of Disease and Adverse Health Conditions:

The United Health Foundation ranks Kentucky 41st in national health measures, with poor standings of 49th in chronic obstructive pulmonary disease (COPD), 47th in cardiovascular disease, 45th in diabetes and chronic kidney disease, and 44th in high blood pressure and premature death. Life expectancy is 70.6 years in Estill County and 74.1 in Bourbon County, both below the national average of 79.05 years (CDC). Heart disease is the leading cause of death in both counties, causing 1 in 5 deaths (KHFS). Lung and bronchus cancer are the top cancers, with rates of 92.5 per 100K in Bourbon and 105.7 per 100K in Estill (NIH). These chronic conditions are intensified by long-term environmental contaminant exposure. The Paris Riverside incinerator and waste transfer station and nearby landfill sites contain lead, mercury, PCBs, and dioxins—toxic pollutants linked to respiratory illness, cancers, and immune system impairment. The former Irvine coal wash is contaminated with coal dust, heavy metals, and PAHs, which are associated with lung and skin cancer, COPD, and cardiovascular disease. Coal dust particles, especially fine particulate matter, are well-documented triggers for COPD and asthma, and their long-term inhalation can permanently reduce lung function. In Millersburg, the former water treatment plant is suspected to contain VOCs and lead, which can leach into soil and groundwater, contributing to neurological damage, developmental harm in children, and organ disease. The correlation between coal-related pollutants and elevated COPD rates is particularly evident in Irvine, where 12.1% of adults are affected—more than double the national average of 5.9%. Across the coalition's target communities, COPD prevalence ranges from 9.3% to 12.1%, reinforcing that respiratory illness is a leading health risk tied to legacy industrial pollution. Vulnerable groups, including children, older adults, and low-income residents, bear a disproportionate burden of these exposures. This EPA Grant will assess these contaminated sites to allow for appropriate cleanup to reduce direct exposure to airborne and soil-borne toxins, improving respiratory and overall health outcomes for residents.


2d. Economically Impoverished/Disproportionately Impacted Populations: The coalition's target areas are communities where poverty, environmental degradation, and historic underinvestment have intersected for

decades, leaving residents disproportionately burdened by industrial, governmental, and commercial land use decisions. Many priority sites are in flood-prone areas, compounding economic hardship for low-income residents who lack the financial resources to recover from repeated flooding, property damage, and service disruptions. Across all three target areas, cumulative impacts are evident, including disability rates nearly double the national average (39–43%), elevated chronic disease prevalence, and higher levels of food and housing insecurity (21–23%). These conditions reflect long-standing disinvestment and the concentration of environmental hazards in economically vulnerable neighborhoods. The EPA Grant will be used to identify and mitigate site-specific contamination while informing reuse strategies that incorporate greenspace, flood mitigation, and green infrastructure. Through community-driven planning, redevelopment will reduce exposure risks, improve climate resilience, and deliver economic and health benefits to residents most affected by environmental and financial vulnerability.

Health Condition	Paris	Irvine,	Millersburg	USA
COPD	10.5%	12.1%	9.3%	5.9%
Adult Diabetes	13.4%	13.1%	11.8%	10.4%
Adult Obesity	42.4%	43.2%	40.5%	33.4%
Disability	39.2%	43.3%	37.1%	28.3%
Asthma	12%	12.2%	11.4%	9.9%
High Blood Pressure	35.3%	37.7%	35.1%	29.6%
Cancer	7.1%	7.4%	7.6%	6.9%
Heart Disease	7.4%	7.9%	6.9%	5.7%

Source: CDC PLACES Age-Adjusted Data, Red indicates over twice the US average

2e. Project Involvement and f. Project Roles: BGADD will prioritize empowering local entities in decision-making for brownfield site identification and prioritization within the target areas. This will be supported by regular community involvement through quarterly public meetings, which will include virtual attendance options to enhance accessibility. The initial draft of the Community Involvement Plan (CIP) will be prepared within the first quarter of the grant, with quarterly factsheets distributed to keep stakeholders informed. BGADD will also disseminate project updates via their website, local newspapers, social media, and factsheets. The Community Involvement Coordinator, working closely with the project director and stakeholders, will ensure local, state, federal, and community partners remain informed about project developments. Additionally, one of the quarterly public meetings each year will take place in each target area, ensuring local engagement is consistently maintained. The Brownfield Advisory Board, comprising representatives from each coalition member and the Qualified Environmental Professional (QEP), will convene monthly to facilitate ongoing project engagement. The Advisory Board will play a critical role in identifying and prioritizing additional brownfield sites and in securing and implementing other funding sources to further support redevelopment. This structured approach fosters transparency and active participation, driving community-driven engagement and boosting the potential for positive outcomes. BGADD’s leadership and extensive network will be leveraged to bolster revitalization efforts across the target areas. Partnerships with local entities ensure that each community’s unique needs are incorporated into site selection, outreach, and redevelopment planning. The Paris Westside Neighborhood Association and Bourbon County Fiscal Court offer critical insight and support, with the Association playing an active role in engaging residents. Over the past three years, these efforts have included more than 50 meetings aimed at collecting community input on existing conditions and goals for improvement. In Irvine, the Estill Development Alliance and Estill County Fiscal Court address long-standing environmental challenges from legacy coal operations. Millersburg collaborates with CV to plan site reuse and promote economic development. These partnerships, combined with targeted community engagement strategies, will support the coalition's objectives of health and economic revitalization. Attached support letters illustrate the diverse backing that strengthens the coalition and reflects a collective commitment to sustainable progress in each target area.

Organization	Contact Info	Org Mission Statement & Project Role
Paris Westside Neighborhood Association (Paris)	Vanessa Logan, 	Mission Statement: “To revitalize the Westside community by addressing economic needs to enhance residents’ quality of life, and foster a vibrant, inclusive neighborhood.” Role (S,C,R): spearheaded the effort to relocate the former incinerator/current waste transfer station; will organize local surveys and meetings to collect community input on clean-up and reuse plans, distribute data.
Kentucky Steam	Chris Campbell, President	Mission Statement: “Integrating the region’s history, culture and natural beauty into a vibrant rail-centered attraction in order to educate, entertain, and inspire past, current, and future generations by operating historic rail equipment.” Role

Organization	Contact Info	Org Mission Statement & Project Role
Heritage Corporation (Irvine)	chris@kentuckysteam.org (859)619-8841	(R): facilitate collaborative efforts with established partnerships, ensuring that redevelopment projects align with community needs.
Mercy Health Marcum and Wallace Hospital (Irvine)	Trena Stocker, President Tlstocker1@mevcy.com (606)723-2115	Mission Statement: "We extend the compassionate ministry of Jesus by improving the health and well-being of our communities and bring good help to those in need." Role (S,C,R): collect and provide ongoing health statistics to drive prioritization of sites, provide meeting space to communicate cleanup plans to community, distribution of materials to community members regarding reuse plans and their health benefits.
Community Ventures (Millersburg)	Kevin Smith, President, ksmith@cvcy.org (859) 231-0054	Mission Statement: "Dedicated to strengthening communities by helping people achieve their dreams of greater economic opportunity." Role (S,C,R): strategic consultation and planning, site selection, expertise in brownfield redevelopment, community engagement and stakeholder collaboration, technical assistance and capacity building.
Bourbon Christian Academy (Millersburg)	Terry Smith, Director tsmith@bourbonchristianacademy.org (859)749-9566	Mission Statement: "Our mission is to teach students to be successful in the classroom, to teach academic excellence, and upon graduation, be ready to attend college or pursue a career. We hope to instill in each student the desire to seek God's will in their everyday life, no matter whether in school, work, or home." Role (S,C,R): provide meeting space, host events, raise awareness by engaging students and families and educate them on all phases of the project, coordinate student-led initiatives and volunteer opportunities.

Note: S = Role in Site Selection, C= Role in Cleanup, R= Role in Reuse

2g. Incorporating Community Input: Incorporating community input is central to the Coalition's approach and is intentionally structured to shape project decisions throughout the life of the grant. BGADD and its coalition partners will use community feedback not only to guide site selection and reuse priorities but also to measure progress and adjust strategies over time. In Paris, over 300 resident surveys and regular public meetings have already shaped plans for recreational and environmental restoration within the Westside Neighborhood. Building on this foundation, BGADD will continue quarterly public meetings, distribute bilingual fact sheets summarizing assessment findings, and maintain an online project page where residents can track updates, review site data, and submit comments. In Irvine, community input will continue to be gathered through forums, focus groups, and targeted outreach to residents near legacy industrial sites. Feedback will be formally documented and reviewed by the Brownfield Advisory Board to ensure local health and environmental concerns directly inform assessment priorities and reuse planning. In Millersburg, ongoing collaboration with local stakeholders (civic leaders, business owners, residents) will guide the reuse of historic and underutilized properties. BGADD will integrate input received during outreach sessions into meeting summaries shared with the Brownfield Advisory Board and made available on the project website. The Coalition's Brownfield Advisory Board, composed of representatives from each target area, community-based organizations, and local governments, will meet quarterly to review and incorporate community feedback into project decisions related to site prioritization, cleanup planning, and future reuse. Meeting summaries and progress reports will be published online and circulated through partner networks, ensuring transparency and accountability. Through this structure, community input is not a one-time activity but a continuous, documented feedback loop that informs every stage of the assessment and redevelopment process.

3. TASK DESCRIPTIONS, COST ESTIMATES & MEASURING PROGRESS:

3a. Description of Tasks/Activities & Outputs: The Assessment Coalition comprised of BGADD, City of Paris, and Estill County request \$1.5 million in funding to implement this EPA Brownfields Coalition Project based on the priority brownfield sites (as discussed in 1c) and additional brownfield sites in the target areas.

Task 1: Project Management and Reporting

a *Project Implementation* BGADD will oversee the grant implementation and compliance with EPA cooperative agreement schedule, terms and conditions and will be responsible for oversight of the QEP contractor to complete the tasks. BGADD will hold monthly Grant Advisory Board meetings with lead and non-lead members, to review project status and take corrective actions to stay on schedule. With QEP contractor support, BGADD will complete EPA quarterly and yearly reports, forms, and ACRES database entry/reporting. A Final Performance Report will document all grant accomplishments.

b *Anticipated Project Schedule:* ACRES reporting begins in the 1st quarter and quarterly reporting begins in the 2nd quarter and continues throughout the EPA Grant project. Annual reporting and forms will be created in the 5th, 9th, and 13th quarters and during final closeout.

c <i>Task/Activity Lead:</i> QEP will complete all outputs with BGADD oversight
d <i>Outputs:</i> ACRES Database Reporting, 4 Annual Financial Reports, 14 Quarterly Reports
Task 2: Outreach
a <i>Project Implementation:</i> BGADD, non-lead coalition member representatives, and QEP will develop a CIP within 3 months of grant award. Lead and non-lead members will host community meetings to educate the public on brownfield assessment plans, timelines, and progress, with virtual attendance options. Materials and EPA reports will be provided to community members and stakeholders.
b <i>Anticipated Project Schedule:</i> Community education meetings in each target area will begin to be held within 3 months of the grant award. Each non-lead member will hold at least two community education meetings in their target area.
c <i>Task/Activity Lead:</i> QEP will prepare and manage all outputs with BGADD, City of Paris, Estill County, and City of Millersburg input and oversight.
d <i>Outputs:</i> Community Involvement Plan, six community education meetings and minutes; site inventory lists and maps; handouts, brochures, fact sheets, and other meeting materials.
Task 3: Site Assessments
a <i>Project Implementation:</i> The QEP will conduct ESA activities through site mapping, inventory, and prioritization, starting first with the seven priority sites listed in this application. ASTM-AAI compliant Phase I; Generic Quality Assurance Project Plan (QAPP); Phase II ESAs will include the site-specific QAPP. Prior to assessment, site access agreements and property eligibility determination (ED) approval will be obtained
b <i>Anticipated Project Schedule:</i> Assessment activities will begin in the 2nd quarter and continue throughout the grant project.
c <i>Task/Activity Lead:</i> The QEP will implement the technical aspects of the project with oversight from BGADD, City of Paris, Estill County, and City of Millersburg
d <i>Outputs:</i> 30 Phase I ESAs; 21 Phase IIs 1 Generic QAPP; 21 SSQAPPs; 30 HASPs; and 21 EDs
Task 4: Remediation/Reuse Planning
a <i>Project Implementation:</i> The QEP will develop Analysis of Brownfields Cleanup Alternatives (ABCA) reports for sites with contamination. The ABCA will identify potentially applicable remediation alternatives for the site by comparing potential land uses with the environmental impacts associated with properties and steps required to redevelop the property. Reuse assessments and market studies will be performed for each priority site within the target areas. The QEP will also develop abatement designs for ACM. Based on these outputs in coordination with community input and associated master plans, the consultant team will create individual reuse plans and visioning concepts for the sites.
b. <i>Anticipated Project Schedule:</i> October 2026 – October 2030; first ABCA by 5 th quarter
c <i>Task/Activity Lead:</i> QEP team with oversight from BGADD, Cities of Paris and Millersburg, Estill County
d <i>Outputs:</i> 21 ABCAs; 3 Site Reuse Assessments (one each in Estill County, Paris, and Millersburg); and 3 market studies (one each in Estill County, Paris, and Millersburg)

3e. Cost Estimates: BGADD and non-lead coalition members have budgeted to allocate 87% of the funds awarded to tasks directly associated with site-specific work (Phase I and II ESAs and site-specific cleanup planning), with over 30% to be spent on eligible reuse/area-wide planning activities.

OVERALL PROJECT BUDGET TABLE

Budget Categories		Project Tasks					Total
		Task 1 Management/ Reporting	Task 2 Community Outreach	Task 3 Site Assessments	Task 4 Remediation/ Reuse Planning	Admin Costs	
Direct Costs	Personnel	\$ 34,560	\$ 11,520	\$ -	\$ -	\$ -	\$ 46,080
	Fringe	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Travel	\$ 28,920	\$ -	\$ -	\$ -	\$ -	\$ 28,920
	Equipment	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Supplies	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Contractual	\$ 43,750	\$ 54,000	\$ 870,800	\$ 456,450	\$ -	\$ 1,425,000
	Construction	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
	Other	\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Direct Costs		\$ 107,230	\$ 65,520	\$ 870,800	\$ 456,450	\$ -	\$ 1,500,000
Indirect Costs		\$ -	\$ -	\$ -	\$ -	\$ -	\$ -
Total Budget		\$ 107,230	\$ 65,520	\$ 870,800	\$ 456,450	\$ -	\$ 1,500,000

Task 1 Project Management & Reporting (\$107,230): Personnel (\$34,560): BGADD Project Director: 16 hrs/

month for 4 yrs. (768 hrs) at \$40/hr (\$30,720). BGADD Project Manager: 2 hrs/ month for 4 yrs. (96 hrs) at \$40 per hour (\$3,840). **Contractual (\$43,750):** ACRES Database, Yearly Financial, and Quarterly Reporting, MBE/WBE Forms, Programmatic Support for the four-year grant period (\$43,750). **Travel (\$28,920):** Five members to attend three conferences/events with flights at \$700, 3 nights hotel at \$300/night, incidentals and per diem at \$82/day [4 days x 5 attendees x 3 events] (\$28,920). Of the 5 members, 4 non-lead partners will receive stipends to attend EPA brownfield conferences from the travel budget.

Task 2 Community Outreach (\$65,520): Personnel (\$11,520): BGADD Project Director: 4 hrs/ month for 4 yrs. (192 hrs) at \$40/hr (\$7,680). BGADD Project Manager: 2 hrs/ month for 4 yrs. (96 hrs) at \$40/hr (\$3,840). **Contractual (\$54,000):** Community Involvement Plan (\$6,000); Brownfield Website, Outreach Brochure/Handouts, Social Media (\$12,000); 6 Community Education Meetings (\$36,000).

Task 3 Assessment (\$870,800): Contractual (\$870,800): 30 Phase I ESAs \$5,000 each (\$150,000); 1 Generic QAPP (\$6,300); 21 SS-QAPPs with associated HASPs at \$4,500 each (\$94,500); 21 total Phase II ESAs with 18 Phase II ESAs at \$20,000 each (\$360,000); Estill County priority site Phase II ESA at \$150,000; Paris priority site Phase II ESA at \$70,000; and Millersburg priority site Phase II ESA at \$40,000.

Task 4 Remediation/Reuse Planning (\$456,450): Contractual (\$456,450): 21 ABCAs \$7,450 each (\$156,450); 3 Site Reuse Plans at \$50,000 each (\$150,000); 3 Market Studies at \$50,000 each (\$150,000).

3 f. Plan to Measure and Evaluate Environmental Progress and Results: As lead coalition member, BGADD will oversee tracking, measuring, and evaluating progress on the EPA Grant, if awarded. The Brownfields Advisory Board and QEP will meet quarterly to monitor outputs, such as environmental assessments, ABCAs, and redevelopment plans. These meetings will track progress on goals, review project expenditures, and share quarterly EPA reports, ensuring project completion within the 4-year period. Data will be tracked in the ACRES database, while community participation, acres ready for reuse, redevelopment dollars leveraged, in-kind contributions, and job creation will be recorded in Microsoft Project spreadsheets. If needed, BGADD will implement a Corrective Action Plan (CAP) and issue a final report on project outcomes for each community.

4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:

4a. Organizational Capacity, 4b. Organizational Structure, & 4c. Description of Key Staff: BGADD, the primary economic development entity for 17 central Kentucky counties, possesses robust organizational capacity to administer the EPA Grant on behalf of all coalition members. This includes managing programmatic, administrative, and financial aspects; coordinating community outreach; engaging with environmental regulators; and aligning timelines and budgets among partners and contractors. The structure includes a Brownfield Coalition Advisory Board from the coalition, project staff, and community organizations, enabling collaborative governance and effective distribution of funds to meet coalition goals. Key staff members include Project Director David Duttlinger (Executive Director, BGADD), who, with a decade of leadership at BGADD and a background as Rear Admiral in the U.S. Navy Reserve, brings extensive oversight and strategic expertise to ensure compliance and financial accuracy. In his role as Director of Community and Economic Development at BGADD, he spearheaded the extension of public water services, increasing access to public water from 70% to 99.1% in Central Kentucky. David is a Vanderbilt University graduate with a degree in civil engineering, a Master of Science in Environmental Engineering from Stanford University and a Master of Public Administration from the University of Kentucky. Project Manager, Logan Hart (Director of Community Planning, BGADD) has extensive experience securing funding, navigating policy challenges, and bringing projects to life that create lasting, positive change. He has secured and managed over \$13.5 million in federal funding since 2020. He holds a Master of Public Administration with a Certificate in Public Financial Management from the University of Kentucky. Mr. Hart will work closely with designated community coordinators established by the board upon grant award to ensure effective local engagement. This experienced team and structured advisory board will guide the grant's successful implementation and community impact. Building on two previous submissions, the coalition has refined project plans, strengthened technical documentation, and expanded partnerships for environmental remediation and long-term economic development.

4d. Acquiring Additional Resources: BGADD has formal procurement policies and procedures that ensure compliance with EPA regulations, including the requirements in 2 CFR Part 200, 2 CFR Part 1500, and EPA's NOFO clauses on contractor selection. BGADD uses competitive procurement methods for contracting all

cleanup-related services and will follow federal rules for fair and open competition, conflict-of-interest safeguards, and documentation of procurement processes if additional expertise and resources are required to complete the project. As required in FY26 guidelines, BGADD discloses that Tetra Tech was procured prior to application submission through a competitive procurement process. Required elements of the procurement, including advertisement details, selection procedures, number of offers received, and executed contract documentation, are included in the Threshold Criteria attachment as specified in Section 2.B.(15) of the guidelines. Tetra Tech brings extensive QEP experience and decades of Kentucky-based brownfield, environmental, and engineering expertise. The county will also consult the Kentucky Brownfield Program, the EPA Region 4 Technical Assistance to Brownfields (TAB) provider, and other available resources to secure any supplemental technical assistance needed to complete the project.

4f. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements: (1) Purpose and Accomplishments: BGADD and its Coalition Grant Advisory Board possess extensive experience administering federal and state financial assistance agreements comparable in scope, complexity, and compliance requirements to the proposed EPA Grant. Advisory Board representatives bring over 45 years of experience in city planning, local government administration, communications, and public engagement. BGADD has managed more than \$60 million in grant and loan funding (Community Development Block Grants, Appalachian Regional Commission grants, Kentucky State Revolving Loan Funds, FEMA projects, and Economic Development Administration awards) with timely expenditures, compliance, and reporting. BGADD is currently administering \$20 million in American Rescue Plan Act funding and is experienced with federal drawdowns through ASAP.gov and ongoing financial and performance reporting requirements. BGADD has successfully managed over \$100 million in federal funding and as per the coalition assessment grant guidance, the table below provides three recent examples.

Federal Project	Source	Amount
Stanton SSES and I and I	ARC	\$1,312,500
Madison County God’s Outreach	CDBG	\$1,000,000
Stanton Water Improvements Phase 3	Infrastructure	\$750,000

BGADD and its partners supported multiple environmental assessments and planning for brownfield redevelopment. In 2023, the Kentucky Department for Environmental Protection Brownfield

Program completed Phase I ESAs for the former Paris incinerator and landfill. In 2024, EPA Region 4 initiated a Targeted Brownfields Assessment Phase II ESA for the former incinerator and waste transfer station. EPA’s Office of Brownfields and Land Revitalization provided market study and financial planning, while EPA’s Technical Assistance to Brownfields provider supported development of a city-wide brownfield inventory and public engagement website. Groundwork USA contributed outreach, documenting communities with elevated needs in the Paris Westside neighborhood. EPA Region 4 Targeted Brownfields Assessment assistance has also been requested for Phase I and II ESAs at the Irvine coal wash priority site, but TBA resources are not expected to address Phase II needs for the coal wash or Paris landfill. The EPA Grant will build upon these prior efforts by completing remaining Phase II assessments to fully characterize contamination and advance cleanup planning and reuse. **(2) Compliance with Grant Requirements:** BGADD complied with administrative, financial, and reporting requirements of federal and state financial assistance agreements. For all awards, BGADD adhered to workplans, schedules, and terms and conditions, and submitted quarterly and annual performance and financial reports on time. BGADD uses internal controls and financial management systems to track expenditures, ensure eligibility of costs, and support accurate and timely drawdowns through federal systems, including ASAP.gov. BGADD has managed multiple concurrent grants across various federal agencies ensuring funds are expended in accordance with program requirements and within periods of performance. All reporting requirements have been met with no findings related to late submissions, ineligible costs, or noncompliance. When scheduling adjustments were necessary, BGADD coordinated with funding agencies to implement corrective actions and maintain compliance. BGADD’s centralized grant management structure, combined with routine internal reviews and oversight by experienced staff, ensures continued compliance across all coalition activities. This capacity positions BGADD to effectively administer the proposed EPA Grant while ensuring that all coalition members adhere to applicable federal requirements and EPA programmatic standards.



Threshold Criteria

Funding Opportunity Number: EPA-OLEM-OBLR-25-05

1. ELIGIBILITY OF LEAD AND NON-LEAD COALITION MEMBERS:

a. *Applicant Type:*

Member	Entity Type	Eligibility Documentation
BGADD (Lead Coalition Member)	Tax- exempt non-profit organization	501(c)3 By-laws
Estill County, Kentucky (Non-Lead Member)	Governmental Entity	N/A
City of Paris, Kentucky (Non-Lead Member)	Governmental Entity	N/A

The lead coalition member, Bluegrass Area Development District (BGADD), was established as a special purpose unit of government by the Kentucky General Assembly on February 10, 1972 with the enactment of Kentucky Revised Statute 147A.050. BGADD is a 501c(3) entity and, as such, is an eligible applicant. See the attachments for supporting documentation. BGADD affirms that the non-lead coalition members, Estill County and the City of Paris, are eligible to receive EPA Brownfield grant funding as governmental organizations.

- b. *Eligibility:* BGADD affirms it is not exempt from Federal taxation under section 501(c)(4). Estill County and the City of Paris are both government entities eligible for participation without additional documentation. BGADD affirms that neither of the non-lead coalition members, Estill County and the City of Paris, KY are exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. TARGET AREAS:

Member	Target Area Name	Address of Priority Sites
BGADD (Lead Member)	Millersburg, Kentucky	302 West 2nd Street, Millersburg, KY 40348
		504 Miller Street, Millersburg, KY 40348
Estill County (Non-Lead Member)	Irvine, Kentucky	(37.72307,-84.00024) Coal Wash Road, Irvine, KY 40336
		1911 Broadway Street, Irvine, KY 40336
City of Paris, Kentucky (Non-Lead Member)	Paris, Kentucky	1004 Stewart Street, Paris, KY 40361
		(38.21659764053052, -84.26024597878904) Gano Street, Paris, KY 40361

3. NON-LEAD MEMBER(S) THAT NEVER RECEIVED AN EPA MARC GRANT:

BGADD affirms that both non-lead coalition members, the City of Paris, Kentucky and Estill County, Kentucky, have never been awarded a EPA Brownfields MARC Grant.

4. LEGAL AUTHORITY TO EXPEND GRANT FUNDS ON BEHALF OF NON-LEAD COALITION MEMBERS:

The Bluegrass Area Development District (BGADD), as the lead coalition member, hereby attests that it has the legal authority to receive, administer, and expend EPA Brownfields Assessment Coalition Grant funds on behalf of its non-lead coalition members, including the City of Paris and Estill County, for the purpose of carrying out the proposed grant activities. BGADD is a regional council of governments established under Kentucky law and is authorized to enter into cooperative agreements, manage federal grant funds, and provide programmatic, administrative, and financial services for member jurisdictions. Consistent with its statutory mission and longstanding practice, BGADD will serve as the fiscal agent for the coalition and will expend grant funds on behalf of the non-lead members to conduct eligible assessment, planning, community engagement, and reuse-related activities within their respective target areas, in full compliance with applicable federal, state, and local laws and regulations, including 2 CFR Part 200 and EPA cooperative agreement requirements.

Kentucky Revised Statutes Chapter 147A formally establishes Area Development Districts and their authority.

- KRS 147A.050 authorizes Area Development Districts to function as regional planning and development organizations serving multiple local governments.
- KRS 147A.080 authorizes Area Development Districts to enter into contracts and agreements, receive and expend federal and state funds, act on behalf of member local governments, and serve as grant administrators and fiscal agents

5. COALITION AGREEMENT:

Active Memorandum of Agreements for each non-lead member to serve as members of the Coalition are found in the Attachments.

6. COMMUNITY INVOLVEMENT:

To further underscore transparency and engagement, BGADD will establish a dedicated page on its website. This platform will serve as a hub to inform of community events, collect feedback, share comprehensive information about the grant project's development and progress with the broader public. Beyond the digital space, BGADD will employ a multi-channel approach, disseminating key community and project information through local newspapers, social media platforms, and informative fact sheets. Through these concerted efforts, BGADD is committed to making community involvement a central and accessible aspect of the entire initiative.

BGADD places a strong emphasis on community involvement as a cornerstone of its strategy. Each local entity will wield decision-making power concerning brownfield sites and priorities in the target area. Throughout the Coalition Grant process, numerous community/public meetings will be conducted, ensuring that the residents actively contribute to the decision-making process.

The Coalition members are committed to quarterly meetings, actively seeking project input from community stakeholders and residents. Recognizing the importance of inclusive planning, a formal Community Involvement Plan (CIP) will be crafted within the initial quarter of the grant. This plan will be accompanied by quarterly community and public meetings, with the added convenience of a virtual attendance option to maximize

participation.

7. EXPENDITURE OF EXISTING GRANT FUNDS:

BGADD affirms that none of the coalition members have open EPA Brownfield Assessment or Multipurpose Grants.

8. CONTRACTORS AND NAMED SUBRECIPIENTS:

- a. *Contractors:* BGADD has dually procured Tetra Tech, Inc for both grant proposal writing and grant implementation services. The solicitation documentation and signed contract are included in the attachments. The Request for Proposals (RFP) was publicly solicited in the October 6th, 2025 edition of the Lexington Herald Leader, the local newspaper with the largest circulation in the BGADD region. BGADD received one response to the RFP (from Tetra Tech), with the solicitation timeframe being open from October 6, 2025 to November 6, 2025. After reviewing the proposal and ensuring that it met all the requirements outlined in the RFP, BGADD decided to proceed with Tetra Tech. BGADD did receive one inquiry about the RFP from the firm Brownfields Environmental Consulting, but they did not submit a response to the RFP.

- b. *Named Subrecipients:* The named subrecipients, non-lead coalition members Estill County and the City of Paris, are both eligible for a grant subaward as governmental organizations. They will receive stipends for conference travel as discussed in the application.