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E dwarren@Lebanon.IN.gov

One Municipal Plaza
401 S. Meridian St.
Lebanon, IN 46052

January 27, 2026

Riley Jenkins
US EPA Region 5
77 West Jackson Boulevard, Mail Code LP-5J
Chicago, IL 60604-3507

RE: Application for a US EPA Brownfields Assessment Grant (FY26) Lebanon, Indiana

The City of Lebanon, Indiana, appreciates this opportunity to submit the enclosed application to the US EPA for a \$500,000 Brownfields Community-Wide Assessment Grant. Funding will support a coordinated effort by the City and community stakeholders and residents to assess and eventually cleanup and reuse our local brownfield sites. Below is the narrative information.

1. Applicant Identification:
The City of Lebanon
Planning Department
401 South Meridian Street
Lebanon, IN 46052
2. Website URL:
 - a. <https://lebanon.in.gov/>
3. Funding Requested
 - a. Community-Wide
 - b. Federal Funds Requested
 - i. \$500,000.00
4. Location
 - a. Lebanon, Boone County, Indiana
5. Target Area and Priority Site Information
 - a. South Street & Main Street corridors from I-65 east to Downtown Lebanon
 - b. Census Tract 18011810400
 - c. Priority Sites (map attached):
 - i. **IMI** – 416 S. West Street
 - ii. **Former Lenox Lincoln-Mercury Dealership** – 328, 322, and 316 W. South Street
 - iii. **Gabriel Metals, Inc.** – 1010 and 1020 W. Main Street



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6. Contacts

- a. Project Director: Derek Warren, Deputy Director of Planning, City of Lebanon
(765) 482-8844
Email: dwarren@lebanon.in.gov
401 South Meridian Street
Lebanon, IN 46052

- b. Highest Ranking Elected Official: Mayor Matthew Gentry, City of Lebanon
(765) 482-1201
Email: mayorgentry@lebanon.in.gov
401 South Meridian Street
Lebanon, IN 46052

7. Population

- a. City of Lebanon, Indiana: 16,662

8. Other Factors Checklist

Other Factors	Page #
The reuse of the priority site(s) will incorporate energy efficiency measures.	2, 3, 4
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	2, 3, 4
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority sites within the target areas.	8, 9

9. Letter from State

- a. The letter from the State is attached.

10. Releasing Copies of Applications

- a. N/A

Sincerely,

Derek Warren
City of Lebanon
Deputy Director of Planning

Attachment A

Letter from the State Environmental Authority



INDIANA DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

100 N. Senate Avenue • Indianapolis, IN 46204
(800) 451-6027 • (317) 232-8603 • Fax (317) 233-6647 • www.idem.IN.gov

Mike Braun
Governor

Clint Woods
Commissioner

January 13, 2026

Mayor Matt Gentry
City of Lebanon
401 South Meridian Street
Lebanon, Indiana 46052

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

Dear Mayor Gentry:

This letter is provided in support of the City of Lebanon (Lebanon) proposal to the U.S. Environmental Protection Agency (U.S. EPA) for Brownfields Community Wide Assessment Grant funding. The Indiana Department of Environmental Management (IDEM) acknowledges that Lebanon is requesting \$500,000 for hazardous substances and/or petroleum assessment.

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

The focus of this initiative is to identify and assess potentially contaminated properties within the target areas including the historic downtown area and area west of I-65. The Irving Materials Inc. (IMI) property, the former Lenox Lincoln Mercury Dealership, and Gabriel Metals have been identified as priority sites within the South Street corridor target area based on their likelihood of contamination and redevelopment potential. New industrial developments secured by the Boone County Economic Development Commission (EDC) will provide thousands of new jobs, many of which are automobile manufacturing-based, and will be providing opportunities for the existing population and those looking to relocate to Lebanon. A major need for this potential influx of residents will be housing, a chief issue identified by the City. The IMI site is an ideal location for an affordable housing complex

Visit on.IN.gov/survey or scan the QR code to provide feedback.

We appreciate your input!



given its location within a residential area and the proximity to the proposed developments discussed above.

Lebanon and Boone County were battered by tornados in 2013 and again in 2016, causing an estimated \$35 million in damages. Many of the City's brownfield sites, already in severe disrepair, were further distressed causing potential contaminants to be released into the environment and creating increased blight and unsafe conditions for our residents. The Lenox site, for example, was already mostly vacant and in disrepair prior to these storms and is now posing a health and safety hazard to the community.

Lebanon has not yet selected specific sites to benefit from U.S. EPA brownfield grant funding. If Lebanon is awarded the requested grant funding, the Program will work with U.S. EPA and Lebanon to determine site eligibility once specific sites are identified.

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

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

Sincerely,



Mitchell Smith
Technical Staff Coordinator
Indiana Brownfields Program

MS/JTM

cc: (via electronic transmission)

Julie Schilling, V3 Companies
Derek Warren, City of Lebanon
John Morris, Indiana Brownfields Program

Narrative

1. Project Area Description and Plans for Revitalization: 1.1 Target Area and Brownfields; a. Overview of Brownfield Challenges and Description of Target Area: The City of Lebanon, Indiana, also known as the "Friendly City," was founded in 1832 and is in Boone County, just north of Indianapolis along Interstate 65. According to the 2020 US Census, Lebanon has population of 16,662 residents. With its location near Indianapolis, the Crossroads of America, Lebanon enjoyed a rich railroad history, and its chief industries were located near these rail corridors. Prior to WWII, industries included sawmills, furniture manufacturing, canning and glove factories, dairies, steel wheel works, and bus manufacturing. Post WWII, industry transitioned to electrochemical plating, printing, and plastics. Over time, these industries relocated as modes of transport began to shift away from rail; however, due to our convenient access to Interstate 65 and having three highway exits, Lebanon is beginning to see a renewed interest from industrial companies.

Our target area is Census Tract 18011810400, a 2-mi² low-income community with a population of 5,700 located in west-central Lebanon. Specifically, we are targeting the Highway 32/South Street and Main Street corridors, an area that is book-ended to the west by three planned large-scale developments and downtown to the east. The target area is bisected by the Big 4 Trail, a trail system to eventually connect Indianapolis to Chicago, and has a large inventory of brownfield sites. This corridor was primarily developed for commercial and industrial use after the construction of I-65 in the 1960s but has since deteriorated as time, natural disasters, and fluctuation in the local economy took their tolls. This area still has many unassessed brownfield sites that have resulted in multiple impacts to our community. These impacts include the relocation of businesses and residents causing a loss of tax revenue, lack of quality housing, exposure to contamination causing detrimental health problems, and blighted areas that scare away would be developers and residents. Our most sensitive population, children, are the most economically impoverished and disproportionately impacted in this area. **At the Census tract level, 14% of the children are in households with income below the federal poverty level, compared to 9.5% in the County¹. Further, almost 50% of these children are eligible for free/reduced lunches and 25% are served by Head Start, compared to only 2.6% in Boone County and 5.7% in the State².**

Redevelopment within this area will yield the greatest benefit to our most vulnerable residents by reducing documented health and environmental risks, catalyzing private investment, expanding housing options, and strengthening opportunities for quality jobs, recreation, and community amenities.

The city has received three EPA Brownfield Assessments grants (FY14, FY19, and FY22) and would like to continue the momentum of assessing and redeveloping our remaining brownfield sites. Because of our experience with past EPA grants, community involvement and excitement, and our new revitalization strategy, we are confident that remaining sites, many of which have signed site access agreements, can be successfully assessed with funding from this EPA grant and eventually redeveloped in line with the city's Comprehensive Plan.

b. Description of the Priority Brownfield Sites: The city has chosen the South/Main Street corridor (Census Tract 18011810400) as the target area due to community input received during a recent area-wide plan (see *Section 1.2d.*) and its location in an economically impoverished and disproportionately impacted neighborhood. This census tract is the only designated Opportunity Zone in Boone County. This corridor is just east of three planned and in-progress developments: the 9,000-acre manufacturing and R&D area, known as the Lebanon LEAP district, the Eli Lilly "medicine foundry", and the Hickory Junction Sport Complex. Main and South Streets lead Lebanon visitors from the highway straight into downtown, and the anticipated Big 4 Trail (former railroad) intersects the central portion of this target area. The city has identified over a dozen brownfield sites in this area, and three priority sites were selected based on their likelihood to be an immediate threat to human health and the environment, secured site access, potential for reuse, priority of the community, needs of residents, and alignment with redevelopment plans.

Irving Materials, Inc. (IMI), located at 416 S. West Street, consists of an approximate 10-acre concrete plant with associated outbuildings and offices. This site is located one block west of City Hall, adjacent to a trailer park to the south, residential homes to the west and southeast, and another brownfield site (a junkyard) followed by South St. to the north. Prior uses include a rail switch yard/freight station with reported

¹ US Census Bureau, American Community Survey (2023, 5-year estimates)

² Indiana Department of Education, 2015 Data

underground storage tanks and a concrete block factory (1948/1963 fire insurance maps).

Lenox Lincoln Mercury Dealership, located at 328, 322, and 316 W. South Street, consists of a one-acre lot with a vacant 17,752 square foot building and associated asphalt parking. The most recent use was a new and used car dealership and, prior to this, it was an auto service shop and junk yard. The building is in severe disrepair and is a safety hazard for the community. The Lebanon Boys and Girls Club and residential homes adjoin the site to the north, a drycleaner followed by a daycare and a previously assessed brownfield are west, commercial property is south, and the downtown area is east.

Gabriel Metals, Inc., located at 1010 and 1020 W. Main Street, consists of a 0.76-acre lot with two light industrial buildings and asphalt parking lots. One building is currently an automotive repair shop, the other is vacant. Historically the site operated as a metal fabrication shop. This site is currently for sale and is along the path of the Big 4 Trail. Residential homes are located to the south and west, The Arc of Boone County is to the east, and a former bulk oil plant followed by a previously assessed and contaminated brownfield site is located north.

Known or potential contaminants of concern at these sites include: asbestos containing materials (ACM), lead based paint (LBP), various metals, polychlorinated biphenyls (PCBs), polynuclear aromatic hydrocarbons (PAHs), and volatile organic compounds (VOCs), especially chlorinated solvents. A brownfield 200 feet west of the Lenox Dealership site was assessed in 2016 (Former Chemical Company) and chlorinated solvents were identified in the soil, groundwater, and soil vapor. A chlorinated plume, originating from a former drycleaner adjacent to the west of the Lenox property, is currently being delineated and is in the State Cleanup Program. The lots to the north of Gabriel Metals were formerly a Standard Oil Bulk Facility and Gasoline Station, Stewart Warner Factory, and a coal yard (1948/1963 fire insurance maps), and have known volatile organic compound (chlorinated solvent) contamination in the groundwater, soil, and soil gas. The bulk oil facility and junkyard sites have not been assessed to date and are additional brownfield sites in our inventory that will be assessed once site access and funding is secured.

Health effects of potential/known COCs include: respiratory damage; asthma; damage to bone marrow, liver, kidneys, and central nervous system; anemia; leukemia; lung and prostate cancers³.

c. Identifying Additional Sites: The remaining South Street corridor has sites of concern that will be assessed as part of this grant and include at least two former gasoline stations, vacant commercial/light industrial buildings, and a former drycleaner. Site access has either already been obtained or is highly likely; however, not all have been secured as of the date of this grant application. If grant funding remains after assessing these eligible sites in our inventory, we will commit funding to request community and stakeholder input via social media outlets and public meetings to expand upon our current brownfield inventory and continue the prioritization process. Prioritization is based on the following criteria: imminent threat to human health or the environment, sites within the target areas, development goals and developer interest, property owner interest/site access attainability, and location within an economically impoverished community.

1.2 Revitalization of the Target Area; d. Reuse Strategy and Alignment with Revitalization Plans: Lebanon's Comprehensive Plan (Plan) was last updated in 2023. The Plan centers on strengthening community character, encouraging strategic investment, and fostering resilient neighborhoods supported by a thriving local economy, strong infrastructure, and healthy, safe living environments. Community input gathered during the Plan's development through public workshops, online surveys, neighborhood meetings, and stakeholder forums consistently underscored the need to reinvest in historically burdened areas, restore aging corridors, expand recreational and natural amenities, and promote mixed-use and housing opportunities near the city's core. One focus of the Plan is to improve the South and Main Street corridors, our target area. This corridor extends from I-65 to the east and ends at the center of downtown. Addressing the brownfield sites along these main corridors is key to revitalizing this neighborhood. Redevelopment plans include commercial businesses (Lenox Dealership), housing and greenspace (IMI Site), and mixed-use development (Gabriel Metals) providing a direct benefit to the residents in this area. These sites are not located within a FEMA-designated floodplain and plans include the addition of greenspace, making these safe and appropriate locations for reinvestment in accordance with sustainability and resiliency considerations.

The city recently invested \$15,000 into an Urban Land Institute (ULI) Technical Assistance Panel (TAP)

³ ATSDR, CDC, 2021

assessment that evaluated the **IMI and Lenox** area and its future redevelopment opportunities. This assessment was conducted by a small panel of ULI member experts that investigated current area conditions, interviewed local business owners and neighborhood residents for their input, and analyzed the challenges along this corridor, essentially providing us with a Master Reuse Plan for the area. The panel recommended that the City position this area as an extension of downtown, create a unique neighborhood identity, establish family-oriented park space, invest in trail and greenspace connectivity, and pursue creative strategies for adaptive reuse and attainable housing for our residents. This proposed redevelopment into a mixed-use residential community with greenspace and trail connections creates a safe and appropriate reuse that supports community goals for housing choice, density near existing infrastructure, and reinvestment in underutilized corridors riddled with brownfield sites.

Our city's past brownfield grants have been instrumental in our recent success in attracting large companies to our area. One such success is the development of the Lebanon LEAP district, which will be home to hundreds of companies and employ over 50,000 employees. Eli Lilly has begun construction on their \$9 billion "medicine foundry," and four other major employers have invested, bringing the total to over \$13 billion. The LEAP district and our historic downtown area bookend our target areas. These jobs will provide above-average wages, and comparable housing and an attractive community will be paramount in retaining this workforce within our city. Currently, most employees at our major employers live in nearby Marion County or south of the city, as Lebanon does not provide the housing needs or convenient amenities that support these employees, let alone the influx of the 50,000 workers expected over the next several years.

Our updated Comprehensive Plan highlights the need to retain these workers, and it is crucial to attract these potential residents by offering quality housing along with a vibrant and healthy community stocked full of popular amenities such as homegrown breweries, shops, and restaurants. The redevelopment plan for **Gabriel Metals** includes splitting this property into multiple parcels and repositioning them for development of community services and commercial businesses that support the influx of workers and the surrounding neighborhood.

In addition to the LEAP district, the west adjacent development, **Hickory Junction**, will serve as a catalyst for the redevelopment of the priority brownfield sites into affordable housing and mixed retail. Hickory Junction is a 95-acre masterplan private development consisting of indoor sports park facilities and commercial, medical, and residential areas. Development of this site is currently underway, and the indoor sports park opened in 2025. Funding from previous EPA grants was instrumental in making this deal happen and was used to assess this property (Old Holiday Inn – ACRES ID 205107). State funding was leveraged to further assess and mitigate environmental impacts identified at this site.

Funding from this grant will allow the assessment of brownfields that are hindering or negatively impacting these projects while allowing the city to use their revenue for developer incentives. The city is providing incentives and infrastructure upgrades for these three developments, a \$52 million investment. The TIF district was expanded to include these properties and our target area for critical on- and off-site infrastructure improvements.

e. Outcomes and Benefits of Reuse Strategy: The reuse strategies for our priority sites, all located in high-density development and downtown areas, benefit the community by lowering the need for initial infrastructure investments, minimizing environmental footprints, creating jobs while adding entrepreneurial opportunities, generating tax revenue, increasing tourism, and reducing sprawl and impact to surrounding agricultural land. We project that the reuse or redevelopment of our target brownfield sites could create **up to 500 temporary/construction jobs and up to 250 permanent jobs, generating more than \$1.4M in annual income tax revenue.** Additionally, these projects are anticipated to produce up to \$700,000 in new TIF revenue. This revenue will be reinvested into community improvements, including the development of over 2 miles of trails and 5 acres of publicly accessible green space.

Local entrepreneurs are critical to our success as a community, and our priority sites are sought after by some of our local talents. The current owner of the IMI facility has been in talks with the city and has agreed to give this property to the city in return for another parcel of property in the industrial area of town. The city is currently investigating potential sites for IMI's relocation but is hesitant to take over this property due to potential environmental concerns. IMI has agreed to site access to the property for assessment activities. The city feels that this property is prime for a residential development featuring attainable homes coupled

with green space and retail services. The Lenox Dealership site is privately owned, currently for sale, and a local investor has indicated interest in purchasing the property for a mixed-use development. Acquiring owner access to this property for assessment purposes is likely as the current owner is motivated to sell the property. The Gabriel Metals site is currently for sale and, with the demolition of the existing structures, would be an ideal site for affordable housing and commercial development.

The redevelopment of these sites, along with the planned developments in our target area, will provide more jobs, attainable housing, and amenities near quality jobs and planned developments. The city encourages new and renovated structures to implement a whole-building energy efficiency approach and utilize strategies and features that improve local resilience to the impacts of extreme weather events and natural disasters. These strategies and features include such things as: energy efficient windows, roofs and HVAC systems, continuous insulation, smart or LED lights, energy star appliances, etc. Using these strategies will replace blight with energy efficient buildings, prevent excessive drain on our local utilities/resources, and provide utility cost savings to our impoverished residents. Furthermore, the assessment and eventual redevelopment of these sites will be a catalyst for urban reinvestment and draw additional residents, thereby increasing the city's tax base.

The proposed assessment and redevelopment of our priority sites will **remove environmental and safety threats, turn idle brownfields into new hubs for economic growth, improve the appearance of community gateways, add or improve recreational space and encourage green transportation, add safe and attainable housing for impoverished residents, and create energy efficient and sustainable development.** Not only will this improve our climate resiliency, but it will also be linked to successful reuse outcomes, improve the economic competitiveness of our city, leverage current and future investment, stimulate private sector investments, and improve our residents' quality of life and economic future.

1.3 Strategy for Leveraging Resources; f. Resources Needed for Site Reuse: Our experience with our recently closed EPA grant has allowed us to be innovative and knowledgeable in our approach to secure funding and resources needed for site remediation and/or reuse after the initial assessment. Our target area is located within a recently expanded Tax Increment Funding (TIF) area, and funding is secured through our Redevelopment Commission (RDC). Approximately \$1,000,000 in TIF are available for use in the target area. Our Lebanon Community Development Council (LCDC) is a functioning commission that does not have a budget but receives funding from the RDC on an as-needed basis.

The RDC is currently funding downtown building renovations for qualifying buildings in the Historic District, which is essentially a nine-block radius around the town square and within our target area. Funding for this program began in 2018 and totals \$1.2 million (\$250,000 per year for five years). To date, the program has seen 27 applications awarded, for a total amount of \$894,000. The final year for the program was 2022; however, the RDC and City staff created an extension to the program that will run through 2027. The redevelopment projects (*Section 1.d.*) within our target area will effectively complement brownfield redevelopment that is accomplished with this grant funding. Our LCDC also has non-TIF funding available for these sites. The City of Lebanon receives \$60,000 per year from Indiana's Riverboat Fund that can also be used towards remediation, site planning, and site development.

The city is also eligible for other funding sources that they will continue to pursue and utilize when needed for site cleanup and reuse. These resources include the Office of Community and Rural Affairs (OCRA) grant funding for building demolition or renovations and site/area planning; Indiana Brownfields Program (IBP) grant funding such as the Phase I Site Assessment Initiative and the Petroleum Orphan Sites Initiative (POSI) program (tank removal, site remediation); and Housing and Urban Development (HUD) low-income housing tax credits (LIHTC) to incentivize housing development.

While leveraged funding from private investors is not guaranteed, this type of resource is likely. As new industry is developed in and around our city, the influx of residents will lead to the inevitable need for redevelopment, be it housing, amenities, or otherwise. The target area for this application is located in a prime area for these types of redevelopments. During our previous grants, the **city successfully leveraged \$1.3M in public funding, \$64M in public/private partnerships, \$700,000 in private funding, and over \$750,000 in remediation funding from the IBP.** Examples of additional funding leveraged for sites assessed with prior grants include \$10 million in Food & Beverage Tax funding that will go toward the

construction of Westside Park (Former Street Garage) and the use of \$500,000 in ARPA funding for façade improvements on two previously assessed sites.

g. Use of Existing Infrastructure: Our sites are in developed areas with established infrastructure like water/sewer, communications, electric, natural gas, and street access; our utility capacity in these areas is sufficient for future reuse. Using this existing infrastructure has many benefits, including cost, time, and energy savings.

2. Community Need and Community Engagement; 2.1. Community Need; a. The Community's Need for Funding: Lebanon has a constrained budget that is being channeled to other critical initiatives and addressing brownfield sites is daunting, especially with the pressing need for vital infrastructure and utility repairs to support the large developments discussed above. Some recent financial drains on the City include infrastructure upgrades, construction of a new water and sewer treatment plant, and the recent passing of state legislature that severely constricts our property tax revenue. These endeavors have exerted immense pressure on our finances, underscoring the need for grant support for our brownfield initiatives.

With our already strained city budget compounded by state legislation that has led to a loss of residential tax revenue and our impoverished residents not being able to pay more in taxes, our funding to assess and redevelop key sites in our community is severely limited.

Compounding our revenue strains, Boone County has seen a 22% increase in population since 2000; yet, **Census Tract 18011810400 has seen only 3.5% in population growth over the same period⁴**. And when geographic areas are compared, economic disparities are noted to be the greatest in our target area. Compared to the rest of the city and the county, our target area residents experience the lowest median household income (MHI) and the highest percentage of people living below the poverty level, especially children and minorities (*Section 2.d*).

Additionally, our city and county were battered by tornados in 2013 and again in 2016, causing an estimated \$35 million in damages. Many of our brownfield sites, already in severe disrepair, were further distressed causing potential contaminants to be released into the environment, creating increased blight and unsafe conditions for our residents. The Lenox site, for example, was already mostly vacant and in disrepair prior to these storms and is now posing a health and safety hazard to the community. Past grant funding gave us the ability to incentivize some of the costs related to the reuse and/or redevelopment to developers and, with this funding, we hope to use this process again for our target area redevelopments.

b. Health or Welfare of Sensitive Populations: The groups at most risk for exposures and health risks associated with the brownfield sites in our target area are among the most sensitive: children and the impoverished. In Census Tract 18011810400 (target area) children account for 26% of the population (compared to 24% in the City) and **14% of children under 18 are in households with income below the federal poverty level, compared to 9% in the County⁴**. Housing conditions can pose serious health threats – 62% of the homes in our target area were constructed prior to 1980 which may be an indicator for asbestos and lead-based paint exposure⁵. Children exposed to lead in their homes are more at risk from environmental lead exposures due to the cumulative effects of lead poisoning⁵. In 2024, 58% of children screened for blood lead in Boone County showed levels above 3.5 µg/dL⁶. Even small amounts of lead have severe effects on a child's nervous system and can cause brain damage, hearing loss, learning disabilities, and other negative developmental effects. **In the target area, 12% of children are disabled compared to 6% in the county and 8% in the state⁵**.

Not only do our brownfields exacerbate welfare concerns of our residents, but they also pose serious health and safety risks. Sites such as the Lenox property are safety concerns as children and teenagers frequently use these properties as makeshift playgrounds or attempt to break into or vandalize the on-site buildings. This strains our police department and our city's revenue, and it exposes our sensitive populations to a myriad of contaminants, some potentially airborne due to the building conditions. Brownfield funding is a major step in the reduction of pollutant sources and the construction of affordable, safe housing, thereby helping to eliminate the need to rent substandard homes near brownfields, both of which expose our sensitive

⁴ ACS, 2023

⁵ ATDSR CDC, 2018

⁶ Boone County Health Department, 2025

populations to health hazards.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: These same residents suffer from high rates of adverse health conditions. As shown in the table, our County’s high cancer incidence (CI) rates, lung disease, and health disease can be directly linked to common contaminants such as VOCs, PAHs, PCBs, metals, ACM, and LBP; all of which have the potential to be found in our brownfield sites. **When compared to the other Indiana counties, Boone ranks 9th highest for prostate CI, 12th highest for endocrine system CI, and 4th highest for brain CI.** Nearly 12% of our population is disabled, 6% of which have cognitive disabilities, which are directly correlated to exposure to PCBs, lead, and mercury, all common contaminants at our brownfield sites⁷. Mortality rates are especially high in our County due to the lack of nearby hospitals and medical centers or the lack of insurance. EPA funding will allow us to assess these sites

	Boone Co.	Indiana
Adults w/heart disease ¹	5.7%	6.2%
Cancer Incidence (CI) ²	481	468
Prostate CI ²	125	106
Endocrine System CI ²	17	7
Brain CI ²	10	8
Heart Disease Mortality ¹	112	51
Lung Disease Mortality ¹	60	13

¹CDC, Additional data analysis by CARES (2022);
²Nat’l Cancer Inst. (2016-19).
 All rates per 100,000 population

and remove harmful contaminants directly linked to the adverse health conditions affecting our sensitive populations. In doing so, we will reduce the occurrences of negative health impacts associated with those hazards and create a healthy environment for our residents and their children, especially those near these potentially contaminated sites.

d. Economically Impoverished / Disproportionately Impacted Populations: The average household income of our target area is \$63,272, compared to \$104,869 in Boone County and \$70,051 in Indiana⁷. The target area has a **higher low-income population (32%) than the State and U.S. (both ~26%),**

and over 10% of the households have incomes below the Federal Poverty Level, compared to only 5% in Boone County⁷. Prioritizing the input of our economically impoverished and disproportionately impacted residents in all phases, from site selection to redevelopment, remains crucial to the city and will be implemented using the strategies discussed in *Section 1.d*. Funding from the EPA allows us the opportunity to begin the revitalization of this historically overlooked corridor that contains a disproportionate amount of brownfield sites. These revitalization goals include the development of quality affordable housing and greenspace, rezoning to support strategic and inclusionary economic development, and an overall focus on applicable and new market sectors. The creation of new affordable housing options near our planned development areas will create a mix of housing types accessible across a range of incomes, promote inclusionary zoning, healthy food options, and more convenient access to higher paying job opportunities. These goals will help provide localized quality jobs and businesses that have potential to increase incomes of our economically impoverished and sensitive populations, improve quality of place, and eliminate substandard, hazardous housing and sources of potential contamination exposure.

2.2 Community Engagement; e. Project Involvement; f. Project Roles: The city will utilize the successful community engagement process (outlined in *Section 2.g.*) used in our prior EPA grants. The city, with help from the LCDC, RDC, and Boone County EDC will continue to: 1) identify opportunities to leverage additional resources; 2) monitor alignment with existing planning efforts; and 3) include target area residents, landowners, business owners, minority groups, and local leaders in the grant implementation process. Meetings will be coordinated for project stakeholders, as needed. These local organizations will identify and engage other organizations and neighborhood groups with interest in brownfield redevelopment. The key organizations that currently partner with the city for brownfield projects include the following:

Partner Name	Point of Contact	Specific Role
LCDC	Corey Kutz, [REDACTED]	Assist with identification of priority brownfield sites in Lebanon; provide input on reuse planning.
RDC	Dr. Robert Taylor, (765) 482-1201, TaylorB@leb.k12.in.us	Oversee TIF districts within the city; disburse additional redevelopment funding.

⁷ ACS 2023

Boone County EDC	Molly Whitehead, (317) 719-5268, mwhitehead@boonecdc.org	Assist with identification of priority brownfield sites; provide input on reuse planning; identify areas suited for industry.
Boone County Health Dept.	Lisa Younts, (765) 482-3942, lyounts@co.boone.in.us	Provide health data, consult on specific health issues, and assist with public meetings related to environmental cleanups.

g. Incorporating Community Input: The city’s community engagement strategy includes the announcement of the grant award and all major grant events to the community through a press release to the Lebanon Reporter, the local newspaper. The city will meet with community partners and their constituents to invite public input and maintain dialogue regarding our brownfields initiative. We have listened to public input when selecting sites and taken their requests into consideration when prioritizing sites selected for assessment. We also utilize social media to reach the public efficiently, have a monthly e-newsletter, and an improved city website, which will also be used to inform the community. The city will create flyers describing the project and opportunities for public engagement for distribution at community facilities. By including organizations that serve our low-income neighborhoods in outreach efforts, we will ensure that our targeted population and community have the opportunity to be involved in the project.

Our proactive engagement framework promises a series of 8-12 strategic public assemblies over the 4-year grant duration. These gatherings are not mere meetings, but beacons of active civic participation and innovation, designed to spark sustained enthusiasm, crystallize insights on site selection and cleanup strategies, and co-create a visionary blueprint for land reuse. In addition, we will conduct public engagement at highly attended community events and meet residents where they are, such as at high school football games and the annual Mischief on Main event. Recognizing the diverse tapestry of our community, we will deploy a multi-channel outreach campaign that will outline planned community engagement activities, provide a project schedule, summarize the project background, and identify key organizations and stakeholders. The city will evaluate the information and prioritize the projects to best address community concerns with priority given to projects that provide the most benefit to our sensitive populations. Community outreach will encourage target area residents to suggest additional sites that can be added to the brownfield inventory, based on community need and the overall program goals.

Translators/translated documents are made available upon request to assist non-English speaking residents or those with hearing/reading impairments, which ensures full participation in the city’s brownfields projects. Assistance is available to those whose physical disabilities would otherwise prohibit them from participating in project-related meetings. Hard copies of the post-award grant Work Plan and final budget are to be available at City Hall to ensure access for those who lack information technology. We also host direct-invitation open houses (and provide food and refreshments) to educate private brownfield property owners about the program and have found this method successful in securing site access, especially for petroleum sites, during previous grants.

3. Task Descriptions, Cost Estimates, and Measuring Progress; 3.1 Description of Tasks/Activities and Outputs:

Upon grant award announcement, the City will begin compiling documents needed for the Cooperative Agreement such as the Work Plan and supporting forms. Once the Work Plan and applications materials are approved by the EPA, the City will begin the Qualified Environmental Contractor (QEC) procurement process following federal procurement regulations 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33. Grant tasks will be completed as follows:

Task 1 – Programmatic Activities, a. Project Implementation: The QEC and the city will perform programmatic activities including managing the project team activities, preparing quarterly reports, annual financial and disadvantaged business enterprise reporting, and all other reporting requirements with EPA (such as ACRES reporting). These reports will highlight the status of completion for tasks, progress made over the reporting period, challenges with project implementation, financial expenditures, preliminary data and findings, anticipated activities in the upcoming reporting period, and changes in key staff involved.

b. Anticipated Project Schedule: Procurement of QEC – October 2026; attend national/regional brownfield conference(s) – 2027; monthly team meetings between QEC and city; submit quarterly reports prior to the 30th of each April, July, October, and January (beginning Jan. ‘27); submit annual financial and DBE reports; provide updates via ACRES quarterly and after project milestones.

c. Task/activity Leads: City and QEP

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

Task 2 – Community Outreach and Inventory Prioritization, a. Project Implementation: The city and its partners will determine strategies for major components of the plan, evaluate how to incorporate community input, and identify critical implementation strategies. Partners listed in *Section 2.e.* have committed to provide assistance as in-kind services for this grant. The city will hold at least six public meetings (one kickoff within the first 6 months of grant period) to educate the community and officials about our current brownfield initiative and solicit input regarding sites. Meetings, whether virtual or in-person, will be held to educate brownfield property owners and to secure access agreements. Prioritization is based on the criteria discussed in *Section 1.c.*

b. Anticipated Project Schedule: Identify additional partners by Jan. '26; host first quarter public meeting and hold subsequent meetings at least every 6 months; prioritize inventory by Dec. '26 and review quarterly.

c. Task/activity Leads: City, QEC, and partners

d. Output(s): Identification of additional partners; meeting minutes; additional sites based on community input; GIS maps, Excel databases of prioritized brownfield sites; information sheets/maps for public issue.

Task 3 – Phase I/II Environmental Site Assessments (ESAs)/QAPP, a. Project Implementation: Once sites are selected and site access is granted, eligibility determinations will be submitted to the EPA Project Officer for approval. After approval, the QEC will conduct Phase I ESAs for the selected sites under ASTM Standard 1527- 21 and the EPAs “All Appropriate Inquiry” rule. Following selection of the environmental consultant, the City, EPA, and QEC will schedule a data management call to discuss quality assurance. The QEC will then prepare a QAPP to be reviewed and approved by the EPA before Phase II work can begin. Prior to each Phase II ESA, a site-specific Sampling and Analysis Plan (SAP) and Health and Safety Plan (HASP) will be submitted to the EPA Project Officer for approval. The city is focusing grant funds on assessments and at least 10 sites will be assessed.

b. Anticipated Project Schedule: Submit QAPP in Dec. '26 and update annually; begin Phase I ESAs immediately - continue as each new site is selected and obtains eligibility approval; submit site specific SAPs and HASPs after Phase I ESA completion (estimated to begin in Jan. '27); begin Phase II ESAs after Phase I completion and SAP/HASP approval; complete all activities by Quarter 15 and ensure final contractor invoices are submitted at least 45 days before grant period ends.

c. Task/activity Leads: QEC and City

d. Output(s): 10 Phase I ESAs; one QAPP (annual update); 10 SAPs/HASPs and 10 Phase II ESAs

Task 4 – Cleanup and Reuse Planning, a. Project Implementation: The QEC will conduct cleanup/reuse planning after evaluation of Phase II data for each site based on potential reuse scenario(s) and public input. Each Analysis of Brownfields Cleanup Alternatives (ABCA) or Remedial Action Plan (RAP) will include remedial actions for identified contaminants that exceed IDEM regulatory screening levels. Remedial actions are evaluated on cost, intended use, feasibility, and effectiveness in protecting human health and the environment. We will hold up to 2 public meetings for each site to inform and solicit feedback from the community. Reuse planning will dovetail our revitalization plan and include infrastructure evaluations, site reuse assessments, and market analyses.

b. Anticipated Project Schedule: Cleanup planning begins after a Phase II determines that contamination is present and occurs for each site meeting criteria; complete planning studies as needed for redevelopment.

c. Task/activity Leads: QEC, Planning/Engineering Firm, and City

d. Output(s): 3 Remediation Work Plans (ABCAs) and planning documents (site specific and as warranted)

3.e. Cost Estimates:

As shown in the table below, **60% of grant funding is allocated to site assessments and 30% of funding is allocated to cleanup and reuse planning.**

	Program Task	Task 1 Programmatic Activities	Task 2 Outreach & Prioritization	Task 3 Phase I / Phase II	Task 4 Cleanup & Reuse Planning	Budget
Direct Costs	Personnel	–	–	–	–	See below*
	Travel	\$4,000	–	–	–	\$4,000
	Supplies	–	–	–	–	–
	Contractual	\$20,000	\$30,000	\$296,000	\$150,000	\$496,000
	Totals	\$24,000	\$30,000	\$296,000	\$150,000	\$500,000

Task 1: Programmatic Activities: Contractual: The \$24,000 budget includes \$20,000 for the QEC (200 hours x \$100/hr). Travel: City staff will attend one national EPA Brownfield Conference (FY27) for a total of \$4,000. This assumes \$2,000 for registration and fees, \$800 airfare for the national conference (Salt Lake City), and \$300/night for hotel for 4 days.

Task 2: Outreach and Inventory Prioritization: Contractual: The \$30,000 budget includes \$30,000 for the QEC (300 hours at \$100/hr). The city/partners will provide space and supplies as in-kind services for meetings.

Task 3: Phase I/II Environmental Site Assessments (ESAs)/QAPP: Contractual: The \$296,000 budget includes: 10 Phase I ESAs (10 x \$5,000 each totaling \$50,000); QAPP (\$6,000); and 10 Phase II ESAs (10 x \$24,000 each totaling \$240,000). These costs are averages and based on typical local consultant fees. Actual costs may vary based on site conditions and complexity.

Task 4: Cleanup and Reuse Planning: Contractual: The \$150,000 budget includes: 3 Remedial Action Plans/Analysis of Brownfields Cleanup Alternatives (3 x \$10,000 each totaling \$30,000); and 3 site reuse assessments, market analyses, infrastructure analyses, or master site plans (3 x \$40,000 each totaling \$120,000).

***Based on past grant experience, City staff will provide all personnel time invested in this effort as in-kind services.** Estimated value, based on EPA grant experience, is \$20,000 throughout the life of the grant and includes such activities as administration tasks, community meeting planning and attendance, regulatory (EPA/IDEM) meetings, document review, and property owner meetings.

3.f. Plan to Measure and Evaluate Environmental Progress and Results: The Project Director will perform monthly reviews ensuring sufficient progress is made and key outputs are on schedule and on track for completion. Corrective actions will be taken immediately to minimize delays, and grant progress and activities will be discussed during monthly brownfield team meetings. The brownfields team and stakeholders will meet quarterly to evaluate and make necessary adjustments to the project.

A site-specific “property profile” will be completed in the ACRES database for each parcel that benefits from the use of EPA funds, and a quarterly progress report summarizing project activities will be submitted to the EPA Region 5 Project Officer (via ACRES) within 30 days of the previous reporting period. The city will ensure that the following measures of success are tracked and documented in quarterly reports/ACRES submittals: brownfields assessments started; brownfields assessments completed with expended amounts; properties with brownfields redevelopment activities underway; cleanup and redevelopment dollars leveraged; jobs leveraged; properties with brownfields cleanup activities started; properties with brownfields cleanup activities completed; and those without cleanup. Additionally, the quarterly progress reports will include modifications to the Work Plan; project activities related to the EPA grant; task progress/schedule; site identification and targeted sites; cleanup redevelopment activity; summary of expenses by category; and other financial assistance leveraged. Electronic copies of all Phase I, Phase II, and ABCA/RAP reports completed during the quarter will be forwarded to the EPA Project Officer email within a week of completion, and the information will be added into the ACRES database. All material will also be forwarded to the Indiana Brownfields Program for inclusion in the Virtual File Cabinet (publicly searchable database).

4. Programmatic Capability and Past Performance; 4.1. Programmatic Capability; a. Organizational Capacity, b. Organization Structure, c. Description of Key Staff: If awarded, the city of Lebanon’s Planning Department

would oversee the grant implementation. The city is fully capable of successfully implementing this funding as evidenced by their performance during the past three EPA Community-Wide Brownfield grants. The successful completion of the proposed assessments will be accomplished by the same robust team of experienced and motivated individuals that managed previous grants and additional city employee support staff.

Project Director: Mr. Matthew Gentry, Mayor of Lebanon, will serve as the Project Director. Mayor Gentry has been in his position since 2015 and served a major role managing the FY14, FY19, and FY21 grants. He will ensure that project milestones are met in a timely manner and will inform residents of the progress and accomplishments of the grant activities.

Project Manager: Mr. Derek Warren, Deputy Director of Planning, will serve as the Project Manager upon award of grant funding. From 2015-present, he implemented and administered three successful EPA Community-wide Assessment Grants for the City. He will be responsible for day-to-day project operation, and duties will involve public outreach, project development, timely reporting, and program management.

Project Administrator: Ms. Tonya Thayer, City of Lebanon's Treasurer, will serve as the Project Administrator. Ms. Thayer has served as the City's and County's Treasurer for seven years. Tonya has overseen the coordination of funding and generally handled financial aspects for city and county projects. Ms. Thayer specifically oversaw financial aspects of the previous brownfield assessment grants and processed payments on the ASAP system.

d. Acquiring Additional Resources: The city will require the services of a QEC to assist with project implementation, and this QEC must have extensive experience managing EPA brownfields assistance grants. The QEC will be selected in compliance with federal procurement requirements. Our consultant will prepare all technical documents to be submitted to EPA and will guide the city through the environmental review stages. Should staff turnover or additional consultants or subcontractors be necessary, the city will be prepared to acquire services of additional consultants or subcontractors, as necessary, using the same procurement process followed during the initial search for a QEC. The city will also receive support from the previously mentioned community partners in *Section 2.f* and the Indiana Brownfields Program.

4.2 Past Performance and Accomplishments; e. Currently Has or Previously Received an EPA Brownfields Grant: The City of Lebanon received a FY14 EPA Brownfields Assessment Grant (BF00E01379) for \$400,000 (\$200,000 each for petroleum/hazardous sites), a \$300,000 FY19 Assessment Grant (BF00E02495), and a \$150,000 FY22 Assessment Grant (4B00E03204). The city was able to successfully utilize 100% of the funding from these grants to assess multiple brownfield sites.

(1) Accomplishments: A total of 30 Phase I ESAs and 28 Phase II ESAs have been completed for the FY14, FY19, and FY22 grants. Funding was also used for the authoring of a QAPP for each grant, grant progress and annual reporting, and to send the City's Brownfield Program Manager to three EPA Brownfields conferences in Los Angeles, Oklahoma City, and Detroit. **As a result of these grants, \$750,000 in clean-up funding and \$66.3M of private/public funding was leveraged or is in the works.** As much of this investment has occurred during our most recent grant funding, we are in the process of updating ACRES with this information.

Of the 30 total sites assessed during the past three grants, 26 have been redeveloped or are currently under construction for new development, sold to new owners with plans for redevelopment, or part of larger scale developments planned for the City. We have found that this is a great program to encourage development at brownfield sites that investors commonly overlook and have had great success promoting brownfields this way.

(2) Compliance with Grant Requirements: The city complied with the work plan, schedule, and terms and conditions of these grants in a timely manner. Timely ACRES updates, quarterly reporting, and document submittals were a priority for the city. **All FY14, FY19, and FY22 grant funds were expended,** and the City invested a **cash contribution of \$20,000 and in-kind services contribution of \$60,000** total for all three grants.

Threshold Criteria Response

THRESHOLD CRITERIA RESPONSE

Community-Wide Assessment Application

1. Applicant Eligibility

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

2. Community Involvement

The city's community engagement strategy includes the announcement of the grant award and all major grant events to the community through a press release to the Lebanon Reporter, the local newspaper. The city will meet with community partners and their constituents to invite public input and maintain dialogue regarding our brownfields initiative. The city has listened to public input when selecting sites and took their requests into consideration when prioritizing sites selected for assessment. The city also utilizes social media to reach the public efficiently, has a monthly e-newsletter, and an improved city website, which will also be used to inform the community. The city will create flyers describing the project and opportunities for public engagement for distribution at community facilities. By including organizations that serve our low-income neighborhoods in outreach efforts, we will ensure that our targeted population and community have the opportunity to be involved in the project.

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3. Expenditure of Existing Grant Funds

N/A

4. Contractors and Named Subrecipients

N/A