



MARTY HEFFNER, PRESIDENT
COMMISSIONERS OF CLAY COUNTY
609 EAST NATIONAL AVE, ROOM 6
BRAZIL IN 47834

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) Clay County,
Indiana

Dear Riley Jenkins,

Clay County, Indiana, appreciates this opportunity to submit the enclosed application to the US EPA for a combined \$400,000 hazardous substances/petroleum Brownfields Community-wide Assessment Grant. Funding will support a coordinated effort by the County and community stakeholders and residents to assess and eventually cleanup and reuse our local brownfield sites.

- 1) Applicant Identification:
Clay County Commissioners
609 E National Ave., Room 6
Brazil, IN 47834
- 2) Website URL:
 - a. <https://www.in.gov/counties/clay/>
- 3) Funding Requested:
 - a. Assessment – Community-wide
 - b. Federal Funds Requested: \$400,000
- 4) Location:
Clay County, Indiana

5) Target Area and Priority Site Information:

- Brazil, Clay City, and Knightsville
- Former Motor Court – 1350 East US Highway 40, Knightsville
- Hughes Property – 549 E. Jackson St., Brazil
- Downtown Clay City Site – 714 Main St., Clay City

6) Contacts:

- a. Project Director and Highest Ranking Elected Official:
 Marty Heffner, Clay County Commissioner President
 609 E National Ave., Room 6
 Brazil, IN 47834
 Phone: 812-446-5500
 Email: heffnerm@frontier.com

7) Population:

- 25,637 (Clay County); 7,935 (Brazil); 488 (Knightsville); 1,189 (Clay City)

8) Other Factors:

Other Factor	Page #
Community population is 15,000 or less.	1, 4
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority sites are impacted by mine-scarred land.	1, 4, 5, 6
The priority site(s) is adjacent to a body of water	
The priority site(s) is in a federally designated flood plain	
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the priority site(s) will incorporate energy-efficient measures.	2, 3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters	2, 3
At least 30% of the overall project budget will be spent on eligible reuse/area-wide planning activities for priority site(s) within the target area(s).	9
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closi	

9) Letter from State is attached

10) Releasing Copies of Applications:
 Not applicable

We thank you in advance for considering our grant application. If you have any questions or require clarification on elements of this proposal, please call me at (812) 446-5500.

Marty Heffner
 County Commissioner President



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

Marty Heffner
Clay County Commissioners
609 East National Avenue, Suite 105
Brazil, Indiana 47834

Re: IDEM Acknowledgement Letter
U.S. E.P.A. Brownfields Grant Proposal
Community Wide Assessment Grant
Clay County Commissioners
Clay County

Dear Mr. Heffner:

This letter is provided in support of the Clay County Commissioners (Clay County) 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 Clay County is requesting \$400,000 for hazardous substances and/or petroleum assessment.

IDEM understands that Clay County has demonstrated its commitment to redeveloping brownfields by taking advantage of financial and technical assistance offered through the Indiana Brownfields Program (Program) and that Clay County, 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 Clay County 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 County with those areas identified by the community that are a priority for revitalization and redevelopment which also aligns with the Clay County Community Plan. Redevelopment plans for the target sites/areas include: continued development along Main Street in downtown Brazil; Clay City has many dilapidated and vacant downtown structures that need environmental assessments and the County plans to work with Clay City USA, a local grassroots organization, to determine best use future plans for revitalization of this downtown area; the Knightsville property has an interested developer (Timberland) who would like to redevelop this site as multi-family affordable homes but the site has a potential for on-

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

We appreciate your input!



site USTs and needs an environmental assessment. These sites are located within close proximity to residential homes and could be a danger to the community.

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

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

IDEM considers Clay County a good 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 Clay County 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

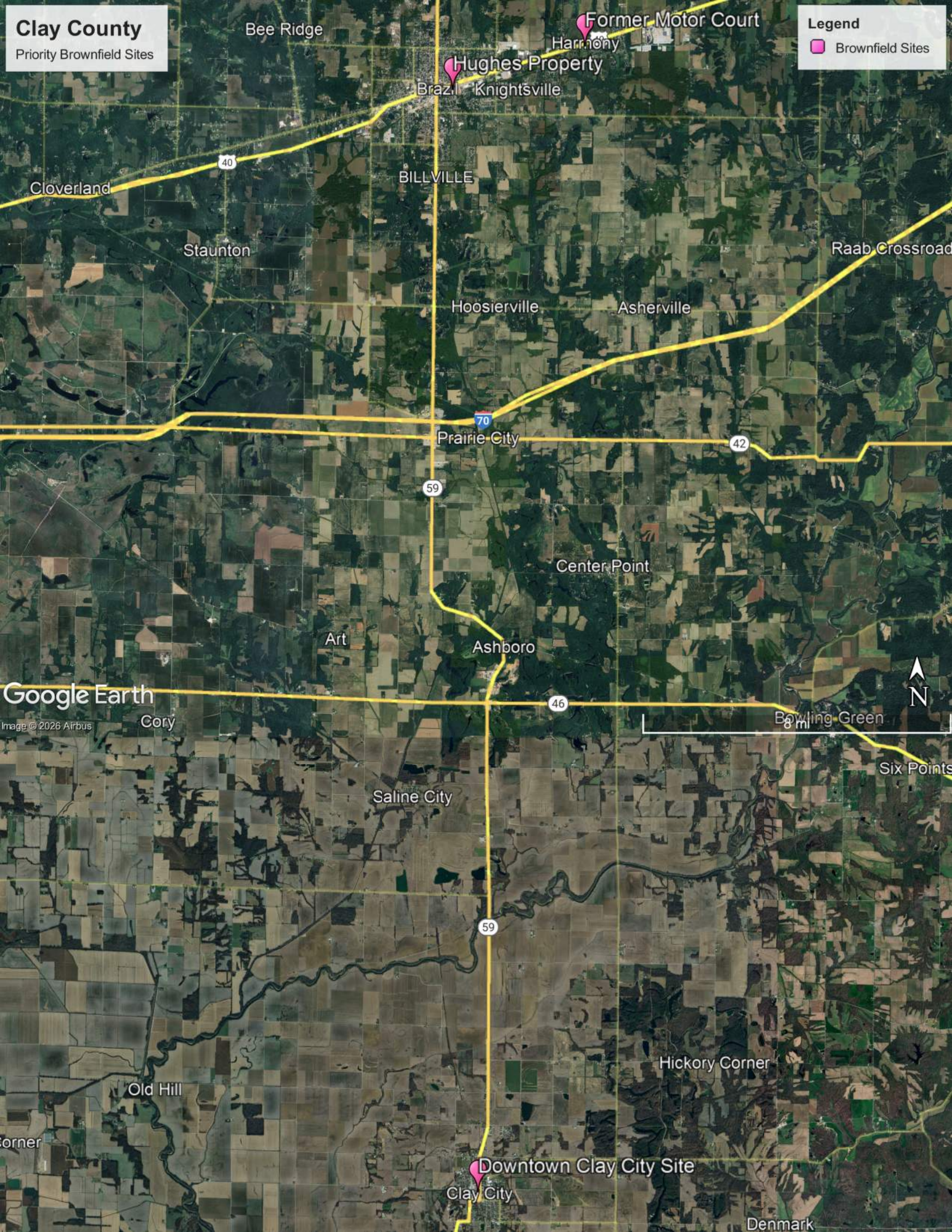
cc: *(via electronic transmission)*

Julie Schilling, V3 Companies
John Morris, Indiana Brownfields Program

Clay County

Priority Brownfield Sites

Legend
Brownfield Sites



Bee Ridge

Former Motor Court

Harmony

Hughes Property

Brazill Knightsville

BILLVILLE

Cloverland

Staunton

Raab Crossroad

Hoosierville

Asherville

70

Prairie City

42

59

Center Point

Art

Ashboro

46

Google Earth

Cory

Bowling Green

Six Points

Saline City

59

Hickory Corner

Old Hill

Downtown Clay City Site

Clay City

Denmark

corner

Image © 2026 Airbus

1. Project Area Description and Plans for Revitalization: 1.1 Target Area and Brownfields; a. Overview of Brownfield Challenges and Description of Target Area: Clay County, a historic gem in the Crossroads of America, is ripe for a transformative journey. Our strategic location along key arteries such as US 40 (National Road), Interstate 70, and vital rail networks has been a catalyst for growth since our establishment in 1825. The county's early settlements thrived due to coal and clay mining industries and their locations near major railways and roadways. This brought about iron and steel mills, fostering a surge in population and local economic growth. However, by the 1890s, these mills relocated to East Chicago, causing an economic downturn in Clay County. While the county continued to capitalize on its clay and coal resources, boosting the local economy, many of the mines were closed by the 1980s. The economic downturn forced many businesses to close, leaving hundreds unemployed and a multitude of vacant buildings.

Our advancement is curtailed by the shadows of our industrial past: abandoned mines and neglected properties. These brownfields are not just eyesores; they are barriers to progress. Except for Brazil, our communities have modest populations under 1,000 residents and are particularly vulnerable, lacking the resources to combat these blights on their own. Without these vital funds, our inventory of brownfields has languished, growing to over 40 in our current inventory.

We prioritize Brazil, Downtown Clay City, and Knightsville, where the brownfield presence is severely impacting these communities. These brownfield impacts include businesses and residents relocating causing a loss of tax revenue, lack of quality housing, exposure to contamination causing detrimental health problems, and blighted communities that scare away developers and residents. **Our target areas are occupied by our most sensitive and disadvantaged populations that are disproportionately affected by these brownfield sites. These areas consist of 29% children (<18), 19% elderly, up to 24% disabled, and 42% of the households are considered low-income¹.** Redevelopment of sites in this area will have the greatest impact on our disadvantaged residents and most sensitive populations, will stimulate private investment, and create safe and attainable housing options and quality jobs.

After brownfield sites in our target communities are addressed, remaining grant funding will be judiciously allocated across the County to other sites primed for redevelopment. Through this grant funding, we will not only preserve the character of Clay County but also catapult our community into a future where history and progress coalesce, and where every resident is a stakeholder in our collective success.

b. Description of the Priority Brownfield Sites: County officials have been compiling a county-wide brownfields inventory since our first EPA Brownfield Grant application was submitted in 2017 and the current list contains **over 40 sites** still in need of funding. Relying on community input received during the recent county-wide planning effort (see *Section 1.d.*), 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, benefits to our sensitive populations, and their alignment with our Comprehensive Plans.

Hughes Property, 549 E. Jackson St., Brazil – This 0.25-acre property is improved with a vacant 4,740 ft² former auto repair facility located a few steps away from the Clay County Courthouse and sheriff's office, Second Baptist Church, and multiple residential homes. The on-site building is unsecured and in a state of disrepair, with many of the windows boarded up or open to the elements. The location of this site one block south of a major thoroughfare (National Rd./US 40) and near our county offices makes it a high priority for redevelopment. Residential homes border the property to the north and south and there is a potential that the **past use of this site as an auto repair facility (1950s through the 1980s) could be negatively impacting those nearby residents.**

Downtown Clay City Site, 714 Main Street – Known as the Mayberry of the Midwest, Clay City is small community nestled near Shakamak State Park. Approximately **60% of the buildings located along our downtown Main Street are in severe disrepair and are unsecured**, with collapsed roofs, potentially allowing asbestos fibers to be released to the environment and adjacent residential properties. Our target site was identified

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

in the Clay City Downtown Plan and is located at 714 Main Street, in the center of the downtown district. The building on this site has been demolished due to its state of disrepair, and the site is currently vacant land situated between two-story downtown buildings. The former building housed auto repair facilities and garages, and various commercial retailers, yet no environmental assessments have been completed to date. **Because of the location downtown and near the library, the community would like to redevelop this space as an active recreation green space.**

Former Motor Court, 1350 E. US 40 East, Knightsville – Formerly used as a motor court with on-site fueling operations, this 5-acre site has been abandoned and vacant for decades. The site is located along the highly traveled National Road (US 40) and is adjacent to residential homes on all sides. Multiple suspected unregistered USTs are on-site. A developer, who has previously redeveloped another brownfield in the county, is interested in this site to develop a plaza-based, energy-efficient multi-family housing development with greenspace.

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). **Health effects of potential / known COCs:** Respiratory damage; asthma; damage to bone marrow, liver, kidneys and central nervous system; anemia; leukemia; lung and bladder cancers². **Proximity to sensitive populations:** These sites are located in high density residential areas where children comprise 29% of the population and over 19% of the population is disabled and/or elderly³.

c. Identifying Additional Sites: If grant funding remains after assessing eligible sites in our inventory, we will 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 and site access attainability, and location within a disadvantaged and / or underserved community.

1.2 Revitalization of the Target Area; d. Reuse Strategy and Alignment with Revitalization Plans: The reuse strategies for our priority sites directly advance the core goals of our 2023 Regional Plan (Thrive), 2025 County-wide Community Plan, and 2019 Clay City Downtown Revitalization Plan, which emphasize 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 each 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 community services and housing opportunities. These priorities are reflected clearly in the projected reuse of each priority site.

Hughes Property – Brazil’s goal is to first remove the environmental threat this site is posing to our nearby sensitive populations. The County wishes to purchase this site from the current property owner and establish a county Welcome Center with greenspace where residents and visitors can access valuable information about Clay County, its events, attractions, and services and the county can host community events such as farmers markets and festivals. The site is not located within a FEMA-designated floodplain, making it a safe and appropriate location for reinvestment in accordance with sustainability and resiliency considerations. This development supports the County Community Plan’s goal to create a Welcome Center while advancing our objective to revitalize the Courthouse Square as an active, welcoming community gathering space.

Downtown Clay City Site – This vacant site sits along Main Street in the center of downtown Clay City and near established neighborhoods, making it highly visible and influential to surrounding community

² ATSDR, CDC, 2023

³ US Census Bureau, American Community Survey (most recent 5-year estimates)

character. Clay City is near the entrance to Shakamak State Park and downtown is primed to be a recreational anchor that enhances regional tourism, directly elevating this site as a priority. The reuse plan for this site is to redevelop this space as a community recreational space that could provide opportunities for social engagement and recreation, supporting the County's goals to enhance the appearance of downtown and establish a strong identity and sense of arrival. Due to its location on SR-59 and near the proposed trail, this space could be used for programs such as the annual tree lighting or casual social activities. Plans are to improve the space with landscaping, a mural, seating and lighting fixtures, and activities such as chess and cornhole. This redevelopment plan aligns with our Regional and Downtown Plans goals to continue placemaking efforts to draw residents and tourism to downtown destinations; enhance quality of life through community beautification and improved amenities; and identify, assess, and promote the redevelopment of brownfield sites.

Former Motor Court – This site currently has the interest of a local developer, Emmert Property Management, who would like to purchase the property for the redevelopment of quality affordable multi-family housing. Emmert completed a similar development, Vanes Apartments, on a brownfield property assessed during the FY09 Brownfield Assessment grant in the City of Brazil, leveraging over \$2M. The plans for the Motor Court property are very similar to the Vanes 20-unit, energy-efficient complex and will provide much needed quality, affordable housing to our Knightsville, and nearby Brazil and Harmony residents. This project aligns directly with our County Community Plan's actionable goal of promoting the 'Homes for the Future' initiative that is a partnership between the County and Thrive, our regional planning commission, to promote the creation of sustainable housing solutions for low- and middle-income families. This site is not located within a FEMA Special Flood Hazard Area, making the proposed redevelopment into affordable multi-family housing a safe and appropriate reuse that supports community goals for housing choice, density near existing infrastructure, and reinvestment in underutilized corridors. Under this grant, if awarded, the City will conduct environmental due diligence, develop preliminary site layouts and building envelope studies, evaluate infrastructure and utility needs, and work with the redeveloper to ensure reuse concepts align with environmental findings and community priorities.

e. Outcomes and Benefits of Reuse Strategy: We live in a very rural county with tight-knit relationships, and our brownfield team members, being lifelong residents of these communities, engage with citizens in the rhythms of everyday life, at the local diner, post office, or place of worship. It is this very fabric of close-knit relationships that positions us uniquely to translate this grant into tangible, life-changing progress for our county. We are dedicated to transforming concerns into actions, addressing the challenges highlighted above, and prioritizing the health and vitality of our community.

Redevelopment will not displace residents or businesses, rather it will provide a vibrant environment, reduce blight, and improve business. Our redevelopment strategy of the three target areas (*Section 1.d*) will help provide localized quality jobs and promote businesses with potential to increase incomes of our sensitive populations, expand our community services offerings, improve quality of place, and eliminate substandard, hazardous housing and sources of potential contamination. Besides assessment and cleanup of sites, creation of park and trail space and quality housing is a chief concern for many of these residents. The transformation of the Downtown Clay City site to greenspace will foster wellness, quality of life, and social connection.

These projects will improve local resilience to the impacts of extreme weather events by creating new greenspace and will also reduce carbon emissions, enhance our trail network / encourage green transportation, turn idled brownfields into new hubs for local economy growth, and create energy-efficient and sustainable development. With Clay County being a predominantly rural area with a focus on agriculture, we plan to incorporate rain gardens, bioswales, urban forests and gardens into our parks plan. This improves our resilience to extreme weather events while providing learning opportunities for our Future Farmers of America students. The assessment and eventual redevelopment of 15–20 brownfield sites will have a transformative, community-wide impact. In these small communities, funding of this scale will positively affect virtually every resident, demonstrate exceptional return on investment and ensure no segment of the population is left behind.

1.3 Strategy for Leveraging Resources; f. Resources Needed for Site Reuse: The Commissioners have utilized thousands of dollars of funding from the Indiana Brownfield Program (IBP) and Office of Community and Rural Affairs (OCRA) in the past for site assessments and cleanup (IBP) and reuse (OCRA). Funding from IBP has allowed us to slowly chip away at a few sites in our brownfield inventory through assessment and remediation. OCRA has provided the county funding for blight clearance (demo and cleanup), planning, and infrastructure upgrades. In this process, we have developed strong relationships with IBP and OCRA and are confident that funding will be provided by these entities for any sites assessed as part of this grant. The county and each community are eligible for other funding sources that they either currently have, and/or will continue to pursue and utilize. These resources include insurance cost recovery, USDA funding, INDOT funding, IBP funding including the Phase 1 Site Assessment Initiative, Revolving Loan Fund, the POSI program, Section 128(a) site-specific EPA funding, and EPA-funded Targeted Brownfields Assessment (TBA). The use of brownfield grant funding has the potential to trigger these other funding sources. For instance, if brownfield funding is used to assess a property and orphan underground storage tanks (USTs) are discovered, we can apply for IBP POSI funding to close the USTs by removal and remediate soil and groundwater as applicable. This type of activity would ultimately lead to the issuance of a Comfort Letter from IBP, creating a shovel-ready site for redevelopment. We have also devised a plan and incentive program for brownfield sites. We can use grant funding to assess environmental risks associated with the properties, use funds collected from our TIF districts for façade and/or infrastructure improvements, create/utilize economic revitalization areas for tax abatements, make use of the county economic development budget, or procure OCRA funding for large-scale planning projects, demolition and cleanup, and encourage and support residents with development incentives for the creation of a new and locally owned viable business.

Amidst this backdrop of need, Clay County has been fortunate to receive \$5 million in ARPA funding, \$1M from INDOT, and \$500,000 from OCRA for essential utility and infrastructure improvements. We believe that with the strategic application of EPA grant funds, in concert with these financial injections, we can catalyze new development, beckon investors, and revitalize our communities in line with our Comprehensive Plans.

g. Use of Existing Infrastructure: The target areas and priority sites are located in areas where water and sewer, fiber optics, electric and gas are readily available for immediate access. In addition, these brownfield sites have easy accessibility to major highways, National Road (US 40) or US 59. Funding from this grant will also be used to complete site-specific infrastructure evaluations to determine utility and infrastructure availability, age, capacity, and condition.

2. Community Need and Community Engagement; 2.1. Community Need; a. The Community's Need for Funding:

Once the pulsing heart of industrial vigor, Clay County's legacy is etched into the very seams of coal and clay that run deep beneath its soil. Our forebears bore witness to a boom of extraction that left a patchwork of brownfields in its wake as stringent IDEM regulations ushered in an exodus of mining firms seeking less costly ventures.

Our only city within the county, Brazil, has a population of 7,935, whereas the remaining towns all have populations under 1,000. With these small populations, limited municipal budgets, and lack of outside grant money or funding, our county struggles to address brownfield sites as ongoing repairs to the aging infrastructure have become a dire economic drain. The paucity of our tax base has left us ill-equipped to mend the crumbling arteries of our infrastructure; many of our roads are in severe disrepair, gravel, or simply dirt. The need to return our brownfield sites to the tax rolls is even more critical to provide funds needed for essential services to our residents, of which, **42% are considered low-income.**

Our smaller communities, like Clay City, bear the scars of this industrial retreat most profoundly. Here, the specter of abandonment looms large, casting a gloom over once-bustling streets. In downtown Clay City, **vacant storefronts outnumber thriving businesses; over 60% are shuttered.** Across the county, the landscape is pocked with the remnants of mining; land stripped of its vitality, daunting investors with its tainted legacy. Since

the departure of our industries, we have endured a consistent loss of revenue and experienced severe population decline from which we have not recovered.

In stark contrast to Indiana's population growth of 4.2% from 2010-2020, Clay County saw a decline of 6.9%³. Without a concerted effort to revitalize and reconstruct, our communities risk becoming relics of time, bereft of the vibrancy and opportunity necessary to retain and attract the promise of new generations. The provision of brownfield grant funding is more than an economic incentive – it's a lifeline. It represents hope for property owners, present and prospective, to ignite the flames of redevelopment and breathe new life into these dormant spaces.

When a FEMA-declared natural disaster occurs, as did in 2023 and 2024 after extreme storm events, our county must scramble to find resources and funding from an already depleted supply. Flooding of waterways near brownfield sites, such as the Hughes Property, causes harmful pollutants to travel through the area, further exposing residents to health hazards. Such events underscore the critical nature of restoring these sites to productive use, not merely for economic rejuvenation but also for the wellbeing and safety of our people. Without assistance from government programs, our communities lack local resources to tackle the brownfields crisis.

b. Health or Welfare of Sensitive Populations: Our target brownfield sites are in residential and downtown areas with high concentrations of sensitive populations: low-income residents, children, the disabled, and the elderly. Approximately **29% of Clay County residents are children (<18 years) and, in Brazil, 23% of those children live in poverty.** We have a higher percentage of elderly (19%) compared to the state and U.S. (14.5% and 13.4%, respectively)³. **Over 19% of our county population has a disability, which is higher than the state (14%) and U.S. (12%); and Brazil's disabled population exceeds 24%³.** Brownfields adjacent to these economically challenged areas depress property values, deter business investments and quality employment opportunities, and amplify the hardships faced by our impoverished and disproportionately impacted residents (see *Section 2.d*).

Our sensitive populations, especially children, are also at a greater health risk of suffering from environmental factors and exposure because they are more likely to live in older, substandard housing units, coupled with being exposed to brownfield site contaminants and abandoned mines. According to the US Census Bureau, greater than **65% of Clay County homes were built prior to 1980**, which is an indicator for ACM and LBP exposure. According to the Indiana Geological Survey, over 275 former shafts were used to mine 10 different areas of coal seam throughout the county. Surface and underground coal mining was prevalent during the late-1800s through the mid-1900s and predates the reclamation regulatory action of 1977. The northern portion of the county, including Brazil and Knightsville, and central and southern portions near Clay City were heavily mined by various companies throughout this time. Mining predominantly ceased during the latter half of the 1900s, and no known reclamation efforts were completed. Health concerns stemming from contamination at mine sites span the range of human pathology which includes neurological diseases, heart diseases, liver and kidney concerns, and cancer⁴.

Given the proximity of these homes to potential brownfield sites and their contaminants, it's clear why our residents also face health conditions and disease. This grant's financial support is crucial for initiating site assessments, leading to the eventual cleanup and transformation of these degraded areas into valuable housing, recreational spaces, and business ventures, as well as integrating them with trail networks.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: As shown in the table, our county's high incidence rates for colorectal and lung cancer can be directly linked to common contaminants such as VOCs, PAHs, PCBs, metals, ACM, and LBP, all potentially found in our nearby brownfield sites.

⁴ Agency for Toxic Substances and Disease Registry

Further, when compared to other Indiana counties, **Clay ranked first for the highest brain cancer incidence rate and 12th for digestive system cancers⁵**. These health issues are compounded by the prevalence of nearby industrial facilities and abandoned mines, highways and interstates, contaminated waterways, and lack of

Incidence / Death rates (per 100k)	Clay County	State
Colorectal Cancer ¹	46	42
Lung Cancer ¹	89 / 52	72 / 41
All Cancers ¹	489 / 212	470 / 180
Heart Disease Deaths ²	240	182
Chronic Lower Respiratory Deaths ¹	79	54
Child Mortality Rate ³	80	60
Premature Deaths (Aged 75 and under) ¹	435	420

¹IN Indicators (2016-2020 CDC data); ²CDC Interactive Atlas of Heart Disease and Stroke (2016-18 data); ³CDC Wonder (2017-20)

resources to tackle these issues (see Section 2.b). Respiratory related diseases and cancer rates are shockingly high in our county. The major polluters discussed above may be a key source of these lung conditions. **The child mortality rate in our county (80) is much higher than the State (60) and Nation (50).** Our county has one of the highest heart disease and chronic lower respiratory hospitalization and death rates in the State, and premature deaths within our senior community are much higher than that of the State.

d. Economically Impoverished / Disproportionately Impacted Populations: Our brownfield sites were selected based on their location in communities that lack funding for community resources and within economically impoverished areas. The median income for Clay County families stands at \$68,087, which is noticeably lower than the state average of \$75,688². And over half (53.9%) of children living in the Clay Community School District are eligible to receive a free or reduced lunch, in comparison of 49.1% for the State⁶. **Further, 42% of Brazil residents are low income, compared to 32% for the state, with 7% unemployed (state = 5%).** Our per capita income is much lower than Indiana’s (\$56,497) at only \$44,878.²

Our residents, particularly sensitive populations living near these brownfield sites, continue to bear the disproportionate environmental and health burdens of past mining activities, contaminated waterways, and substandard housing. Because these are small, rural communities, even a single contaminated site can affect a large share of the population, amplifying negative health and environmental consequences for nearly every household. EPA funding will allow us to assess these sites and identify harmful contaminants that are directly linked to documented adverse health conditions in our economically distressed communities.

Redevelopment of these brownfields will produce outsized benefits, improving air quality, reducing pollution exposure, expanding access to safe housing and public facilities, and creating spaces that encourage physical activity. In communities with limited population and resources, these improvements do not impact a few residents; they protect entire neighborhoods. By reducing environmental hazards at their source, this project will meaningfully decrease negative health outcomes and create healthier environments for residents and their children, especially those living adjacent to these sites.

2.2 Community Engagement; e. Project Involvement; f. Project Roles: Since 2015, the commissioners have been meeting with county, city, and town representatives to discuss the brownfields initiative to community leaders and stakeholders. Through these ongoing engagements, the community leaders expressed their support and identified abandoned industrial properties and vacant, rundown buildings for consideration under this EPA grant proposal. This early and continual involvement provides significant outreach opportunities to discuss potential site reuse with developers, property owners, and prospective purchasers. The commissioners also serve as members of steering committees in the Revitalization Plans efforts. We will continue this local outreach to grow the established grassroots community network within our area. To engage our targeted communities, we will rely on our partners, listed below, to assist in gathering input on sites.

Partner Name	Point of Contact	Specific Role in the Project
Thrive West Central	Ryan Keller, 812.248.1561 rkeller@thrivewestcentral.com	Will provide EPA grant experience to guide the grant process; assist with securing additional funding for cleanup and redevelopment and advertise sites to potential investors and developers.

⁵ National Cancer Institute (2016-2019 data). www.surveillance.cancer.gov, retrieved November 2, 2024.

⁶ IN Dept. of Education, Kids Count, 2022 data

Clay City USA Foundation	David Schuck, 812.939.3517 David.schuck@amwater.com	Assist with identification and prioritizing brownfield sites; provide venue for public meetings; community outreach.
Clay County Health Department	Dr. Camillo Mendoza, 812.448.9021 mendozac@claycountyin.gov	Community outreach; emergency response; health monitoring of residents affected by contamination.
IN Brownfields Program	John Morris, 317-234-0235, jmorris@ifa.in.gov	Assistance with site closure; provide remediation funding; property owner meetings and remediation guidance.

g. Incorporating Community Input: Upon grant award, the commissioners will host a kickoff meeting and will provide updates, progress reports and solicit input throughout the grant term during our monthly County Commissioners’ meetings. Monthly commissioners’ meetings will become hubs of collaboration and innovation, where we will not only update the community on our strides but also actively seek their wisdom and input. Public and stakeholder meetings will predominantly be held in the Commissioner’s meeting room on the first floor of the Clay County Courthouse, located in Brazil; however, venues such as Clay City USA office or religious institutions will be utilized for site-specific meetings in their town for maximum participation by local residents.

We recognize that every voice matters. Our senior and disabled citizens will have seamless access to these discussions with ADA-compliant venues and virtual alternatives. To ensure inclusivity, translators and sign language interpreters will be available upon request, alongside translated documents, welcoming our non-English speaking and hearing-impaired residents into this vital conversation.

Our commitment to keeping the community informed and involved doesn't stop at meetings. We will harness the power of local media, distributing press releases and informative fact sheets through newspapers, such as the Brazil Times, and key community organizations, including the county health department. We will galvanize local organizations to amplify our message, using their networks to ensure that every citizen has a say in shaping our site selection, prioritization, and reuse strategies. Their outreach, tailored to their community’s unique preferences, be it public meetings, digital blasts, bulletin boards, or social media, will enrich our project with diverse perspectives.

Our outreach is multifaceted, employing traditional print and social media channels to foster participation and transparently report our journey. As we progress into clean-up and redevelopment phases, our engagement will intensify, with specialized public meetings and charrettes that not only inform but also invite invaluable community feedback. As our project reaches its culmination, we will hold a final public meeting – a moment to reflect on our shared challenges and triumphs and to gather final thoughts and insights from our community.

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

The county and its partners will determine methods and solutions for major components of the plan and process, evaluate how to best solicit and incorporate community input, and identify critical implementation strategies. Grant tasks will be completed as follows:

Task 1 – Programmatic Activities; a. Project Implementation: During the first quarter, the county will retain the services of a Qualified Environmental Contractor (QEC) through a competitive bidding process compliant with federal procurement regulations 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33. Partners listed in **Section 2.e-f.** have committed assistance and in-kind services for this grant. The QEC and the county 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 any changes in key staff involved.

b. Anticipated Project Schedule: QEC procurement process and selection in first quarter; monthly team meetings between QEC and the county; quarterly reports submitted the 30th of each April, July, October, and January (beginning Jan. 2027); financial and DBE reporting submitted annually; updates to ACRES after project milestones and/or quarterly; 1-2 commissioners to attend national/regional brownfield conference(s) in 2027.

c. Task/Activity Leads: Clay County and QEC

d. Output(s): Commissioner(s) to attend brownfields conference(s); meeting minutes and project performance reviews/reports; quarterly reports submitted via ACRES and financial and DBE reports submitted via email; calls, meetings, and correspondence between team (county, QEC, EPA, and partners) for grant management.

Task 2 – Community Outreach and Inventory Prioritization; a. Project Implementation: Site selection and prioritization will begin in November 2026 with outreach to stakeholders and residents to seek input on opportunities, with particular emphasis on the targeted populations. The county will hold at least six public meetings (one kickoff within the first 6 months of the grant period) to educate the community and officials about the 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. We will request community and stakeholder input 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 proximity to sensitive populations. This grading metric will create a database to integrate with our current GIS maps and color coded by priority level (high, medium, low) to quickly identify sites.

b. Anticipated Project Schedule: Solidify community partners and stakeholders by Jan. 2027; first public meeting in Quarter 1 and subsequent meetings at least every 6 months; prioritize inventory (score sites) by December 2026 and review quarterly.

c. Task/activity Leads: County, QEC, and Partners

d. Output(s): Identification of additional partners; meeting minutes; additional sites based on community input; GIS maps and databases of prioritized brownfield sites; informational sheets and maps for public distribution.

Task 3 – Phase I/II Environmental Site Assessments (ESAs)/QAPP; a. Project Implementation: Once sites are selected and 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. After the data management call with the EPA Project Officer, the QEC will prepare a QAPP, which will be reviewed and approved by the EPA before Phase II work can begin. Prior to each Phase II ESA, the county and QEC will submit a site-specific Sampling and Analysis Plan (SAP) and Health and Safety Plan (HASP) to the EPA Project Officer for approval. The county’s grant funds focus is on Phase II ESAs, and at least 9 sites will be assessed as part of this grant; however, we would like to exceed this goal and assess 12 properties.

b. Anticipated Project Schedule: The QAPP submittal in Nov. 2026 and updated annually; Phase I ESAs begin upon finalization of Cooperative Agreement and continue as each new site is selected and obtains eligibility approval; Site-specific SAPs and HASPs submittal after Phase I ESA completion (estimated to begin Dec. 2026); Phase II ESAs commence after Phase I completion and SAP/HASP approval; all activities completed by end of Quarter 11 and final contractor invoices submitted at least 45-days to end of grant period.

c. Task/activity Leads: QEC and the County

d. Output(s): 9-12 Phase I ESAs; QAPP; 7-10 SAPs/HASPs and Phase II Investigations

Task 4 – Cleanup and Reuse Planning; a. Project Implementation: If sites require planning activities outside of the QEC capabilities, the county and its partners will select a qualified engineering/planning firm following Federal procurement regulations. The QEC/Eng. Firm 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) / 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. Up to 2 public meetings will be held for each site to inform and solicit feedback from the community; the services of the Health Department will be sought, if needed. Reuse planning will dovetail our revitalization strategy and include such outputs as infrastructure evaluations, site reuse assessments, and market analyses.

b. Anticipated Project Schedule: Cleanup planning for sites commences when contamination is confirmed (est. Summer 2027) and public/stakeholder meetings will be scheduled at the onset and completion of these activities; planning studies completed as needed for site redevelopment and occurring after the completion of the site RAP.

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

d. Output(s): 2-3 Remediation Work Plans / ABCAs; 3 site specific reuse planning documents

3.e. Cost Estimates

Program Task	Task 1 Programmatic Activities	Task 2 Outreach & Prioritization	Task 3 Phase I / Phase II	Task 4 Cleanup / Reuse Planning	Budget
Personnel	\$2,000	\$6,000	\$2,000	\$6,000	\$16,000
Travel	\$3,000				\$3,000
Supplies					0
Contractual	\$15,000	\$40,000	\$192,000	\$134,000	\$381,000
Total Budget	\$20,000	\$46,000	\$194,000	\$140,000	\$400,000

Task 1: Programmatic Activities: The \$20,000 budget includes \$15,000 for the QEC (150 hours x \$100/hr) and \$2,000 for the county (40 hours x \$50/hr). County staff will attend one national and one regional EPA Brownfield Conference for a total of \$3,000. This assumes \$1,500 for registration and fees, \$500 airplane ticket to the national conference (Salt Lake City) and \$200/night for hotel for 5 days (both conferences combined). We anticipate that the county staff will spend much more time than listed above throughout the duration of the grant; however, these hours will be provided as in-kind services.

Task 2: Outreach and Inventory Prioritization: The \$46,000 budget includes \$40,000 for the QEC (400 hours at \$100/hr) and \$6,000 for county personnel (6 public meetings @ 5 hours per meeting = 30 hours; 90 hours for inventory and meeting prep; total of 120 hours x \$50/hr). The county and Clay City USA have committed to provide meeting space and supplies as in-kind services for grant associated meetings.

Task 3: Phase I/II Environmental Site Assessments (ESAs)/QAPP: The \$194,000 budget includes: 9 Phase I ESAs (9 x \$5,000 each totaling \$45,000); QAPP (\$7,000 total), and 7 Phase II ESAs: (7 x \$20,000 each totaling \$140,000). We anticipate \$2,000 for county personnel time at meetings (40 hours at \$50/hr). These costs are averages only and may vary based on site conditions and complexity.

Task 4: Cleanup and Reuse Planning: The \$140,000 budget includes: 2 Remedial Action Plans/Analysis of Brownfields Cleanup Alternatives (2 x \$7,000 each totaling \$14,000), further reuse planning for at least 3 sites (3 x \$40,000 totaling \$120,000), and \$6,000 for county personnel for guidance and review (120 hours at \$50/hr). **Any county staff time invested above the amounts listed above will be provided as in-kind services throughout the duration of this grant timeline.**

3.f. Plan to Measure and Evaluate Environmental Progress and Results: The program manager for the grant will perform monthly grant reviews ensuring sufficient progress is being made and key outputs are on schedule and on track for completion. A summary will be reported monthly to the program director. Corrective actions will be taken immediately to minimize delays and grant progress and activities will be reported to and monitored by county commissioners. Commissioners will update the public as progress is made during their monthly public meetings. The program manager will meet quarterly with the team to evaluate and make necessary adjustments to the project. While the number of completed Phase II ESAs and ABCAs/RAPs will also be used as measures of success, their number and cost to complete will be dependent on the outcome of Phase I ESAs. 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 Commissioners 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 & 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 relative 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 via email within a week of completion. All material will also be forwarded to the IDEM and the IBP.

4. Programmatic Capability and Past Performance; 4.1. Programmatic Capability; a. Organizational Capacity, b. Organization Structure, c. Description of Key Staff: If awarded, the three-member Commissioner staff will oversee the grant implementation. The county is fully capable of successfully implementing this assessment grant as evidenced by their performance during past federal and state grants. The successful completion of the proposed assessments will be accomplished with a robust team of experienced and motivated individuals and will include a Program Manager, a Program Director, a Program Administrator and county support staff.

Program Director: Mr. Marty Heffner, Commission President, will serve as the Program Director. Marty has served as a commissioner since 2018 and played a major role in managing OCRA grants, ARPA funds, and various state funding and grants. Marty will help to ensure that project milestones are being met in a timely manner and will inform residents of the progress and accomplishments of the grant activities.

Program Manager: Mr. Bryan Allender, Commissioner, will serve as the Program Manager. Bryan has served two terms as a Clay County commissioner and is a local business owner. Bryan assisted with the FY09 Coalition Brownfield Assessment grant, has helped the county secure over \$1 million in grant funding for road improvements, and oversees the County’s READI grant. Bryan will oversee grant administration, public outreach efforts, project development, and reporting.

Program Administrator: Ms. Patricia Foxx, Controller, will serve as the Program Administrator. Ms. Foxx has overseen the county’s financial affairs since 2012. Patricia specializes in working with the financial components of numerous state and federal grants and will serve as the financial manager for this EPA grant. She will conduct draws, disbursements, and establish accounting and tracking systems.

d. Acquiring Additional Resources: The Clay County Commissioners will procure the services of a QEC experienced with EPA and IBP processes to complete the technical site components of the project. The QEC will be selected in compliance with federal procurement requirements (2 CFR Parts 200 & 1500 and 40 CFR Part 33). Should staff turnover or additional consultants be necessary, the county will be prepared to acquire these services using the same procurement process followed during the initial search for a QEC. In addition, having three commissioners involved with grant administration ensures adequate cross-training in the event of staff loss and efficient training of incoming staff. The county will receive support from the community partners listed in *Section 2.f* and will continue to utilize the services provided by the IBP and KSU TAB program.

Past Performance and Accomplishments: e. Currently Has or Previously Received an EPA Brownfields Grant:

(1) Accomplishments: Clay County was a coalition member of the FY09 \$894,000 EPA Brownfields Assessment grant (petroleum – BF00E94801; hazardous – BF00E94401) awarded to Thrive West Central (formerly West Central IN Economic Development District) which included the coalition partners of Clay, Putnam, Sullivan, Vermillion, and Vigo counties. Grant details are further discussed in the following table.

Grant Type	Grant Term	% Funding Utilized	ACRES Status
\$894,000 FY09 Coalition Assessment	10/1/2009 – 9/30/2012	92%	Complete
Outputs: 28 Sites were identified and prioritized during grant implementation, and 9 of these sites were located in Clay County. One QAPP was developed, submitted, and approved. Over \$200,000 of the total grant funds were utilized on Clay County sites. In sum, 80% of grant funding was utilized for site assessments (Phase I/Phase II/Cleanup Planning).			
Outcomes (Clay County only): The Vanes Property was redeveloped as a 20-tenant, energy-efficient, affordable housing complex. Two other sites were redeveloped as locally owned light warehouse businesses. Over 70 temporary jobs and 100 full-time jobs were created for these three projects. Further, over \$25M of private funding was leveraged for these projects.			

(2) Compliance with Grant Requirements: The coalition met the terms and conditions of the work plans and Cooperative Agreements, exceeded projected outputs, and completed all work within grant timeframes. Over 90% of the total grant funds were expended and over 80% was spent on direct assessments (i.e., Phase I/Phase II/Cleanup Planning). Quarterly reports and the final report were submitted on time and approved by the EPA project manager. Project information was promptly entered in ACRES after the web-based program was integrated into the EPA Brownfields Protocol and at the request of EPA.

Threshold Criteria Response

THRESHOLD CRITERIA RESPONSE

Community-Wide Assessment Proposal

1. Applicant Eligibility

The applicant is Clay County, 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.

2. Community Involvement

Upon grant award, the commissioners will host a kickoff meeting and will provide updates, progress reports and solicit input throughout the grant term during our monthly County Commissioners' meetings. Monthly commissioners' meetings will become hubs of collaboration and innovation, where we'll not only update the community on our strides but actively seek their wisdom and input. Public and stakeholder meetings will predominantly be held in the Commissioner's meeting room on the first floor of the Clay County Courthouse, located in Brazil; however, venues such as Clay City USA office or religious institutions will be utilized for site-specific meetings in their town for maximum participation by local residents.

We recognize that every voice matters. Therefore, we will ensure that our senior and disabled citizens have seamless access to these discussions, with ADA-compliant venues, and provide virtual alternatives. To ensure inclusivity, translators and sign language interpreters will be available upon request, alongside translated documents, welcoming our non-English speaking and hearing-impaired residents into this vital conversation.

Our commitment to keeping the community informed and involved doesn't stop at meetings. We will harness the power of local media, distributing press releases and informative fact sheets through newspapers and key community organizations, including the county health department. We will galvanize local organizations to amplify our message, using their networks to ensure that every citizen has a say in shaping our site selection, prioritization, and reuse strategies. Their outreach, tailored to their community's unique preferences, be it public meetings, digital blasts, bulletin boards, or social media, will enrich our project with diverse perspectives.

Our outreach is multifaceted, employing traditional print and modern social media channels to foster participation and transparently report our journey. As we progress into clean-up and redevelopment phases, our engagement will intensify, with specialized public meetings and charrettes that not only inform but invite invaluable community feedback. As our project reaches its culmination, we will hold a final public meeting, a moment to reflect on our shared challenges and triumphs, and to gather final thoughts and insights from our community.

3. Expenditure of Existing Grant Funds

The County does not have an open EPA Brownfields Assessment or Multipurpose Grant.

4. Contractors and Named Subrecipients

To date, the County has not procured contractors nor have we named any subrecipients.