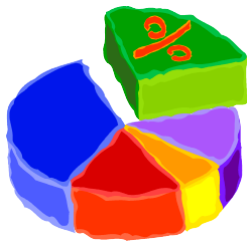
# Brownfield Cost Share

June 2022

EPA BROWNFIELDS AND LAND REVITALIZATION

# Cost Share

- Cleanup and Revolving Loan Fund (RLF) cooperative agreement (CA) recipients are required to provide a 20% cost share.
- The cost share is the portion of your project that is covered under your CA but not funded by EPA.
- The cost share can be met with eligible costs as defined in the CA.



# Statutory Requirement

- The Cost Share is a Brownfields statutory requirement. See CERCLA § 104(k)(9)(B)(iii).
- Cost Share is defined in 2 CFR § 200.306.
- It is in your CA Terms & Conditions
  - ✓ Cleanup – Section IV.A
  - ✓ RLF – Section IV.A

# Meeting the Cost Share

- The cost share must be met with eligible & allowable costs within the period of performance of your CA.
- It must be supported by adequate documentation.
- For RLF CAs:
  - ✓ The CA recipient is required to meet the cost share
  - ✓ It can be passed on to your borrowers & subgrantees

EPA BROWNFIELDS AND LAND REVITALIZATION

# Eligible & Allowable Costs

- The cost share contribution must be:
  - ✓ **Verifiable** from your records
  - ✓ **Non-Federal** (unless authorized by the source such as CDBG)
  - ✓ **Necessary & Reasonable** for project objectives
  - ✓ **Allowable under 2 CFR 200 Subpart E – Cost Principles**
  - ✓ **Not Part** of another grant's cost share
  - ✓ **Identified** in the approved budget
  - ✓ **Allocable** to eligible project activities

EPA BROWNFIELDS AND LAND REVITALIZATION

# Cost Share Resources

- The cost share can be met with contributions of:
  - ✓ Cash
  - ✓ Non-Federal Grants
  - ✓ Labor
  - ✓ Materials
  - ✓ Supplies
  - ✓ Services

# CA Recipient Labor

- Contributions of labor are a great way to help meet your cost share. Keep in mind the:
  - ✓ **Timing** – After CA award unless pre-award costs are approved
  - ✓ **Records** – Need to keep proper records such as time and effort reports

# Volunteer Labor

- Volunteer labor may be used but keep in mind:
  - ✓ **Records** – Same as CA recipient documentation, to the extent feasible
  - ✓ **Value Estimate** (hourly rate)
    - Rate you or a non-profit pays its own workers
    - Rate of pay for similar work in the same labor market
    - You can include fringe benefits
    - Must be fair & reasonable
    - Must show how rate is derived in your records
  - ✓ **Safety & Health Concerns** – Work must be safe for the volunteers

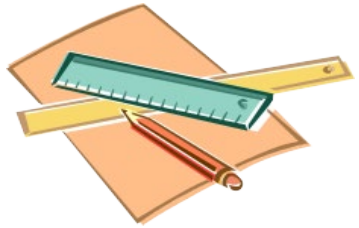
EPA BROWNFIELDS AND LAND REVITALIZATION

# Third Party & Other Labor

- A third party or other organization labor is allowable but keep in mind:
  - ✓ **Must be Verifiable** - documentation in your records
  - ✓ **Value Estimate** (hourly rate)
    - Must be the employee's regular rate
    - You can include fringe benefits
    - No overhead costs
- Examples:
  - ✓ Site Manager
  - ✓ Quality Assurance (QA) Officer
  - ✓ Labor for other programmatic activities

# Donated Supplies & Equipment

- Supplies
  - ✓ Must be market value at the time of donation
  - ✓ Examples:
    - Office supplies
    - Clean fill
    - Containment fabric
- Equipment
  - ✓ Fair rental rate at the time of use
  - ✓ Age & condition can be considered



# Other Services

- Waiving the cleanup waste disposal fee
- Cleanup waste or clean fill transportation
- Site security (such as fencing or signage)
- Dust control
- Clearing & demolition (if essential for cleanup)
- Analytical work (confirmation sampling)
- Outreach (Community notices, meeting space rental)

# Suggestions

- Have a plan to meet your cost share
  - ✓ Who, what, where, when
- Document, Document, Document
  - ✓ Cost, benefit, service, hours, value, rate
  - ✓ Basis for your calculations
  - ✓ Be clear and specific

# Suggestions (Cont.)

- Include your progress in meeting the cost share in your Quarterly Reports
- Monitor the status of your cost share periodically
- Get documentation when the cost share activity occurs!!!

# Questions

- If you have any questions about the cost share requirement or how to meet it, contact:

| Cleanup | RLF |
| --- | --- |
| Jim Byrne<br>617-918-1389<br>byrne.james@epa.gov | Dorrie Paar<br>617-918-1432<br>paar.dorrie@epa.gov |