



EPA New England

BROWNFIELDS COST SHARE



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 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 <u>CERCLA § 104(k)(9)(B)(iii)</u>.
- Cost Share is defined in <u>2 CFR § 200.306</u>.
- 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

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 <u>2 CFR 200 Subpart E Cost</u> <u>Principles</u>
 - **Not Part** of another grant's cost share
 - ✓ **Identified** in the approved budget
 - ✓ **Allocable** to eligible project activities



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



Third Party & Other Labor

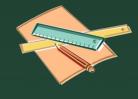
- A third party or other organization labor is allowable but keep in mind:
 - ✓ **Must be Verifiable** documentation in your records
 - ✓ Value Estimate (hourly rate)
 - Must be the employee's regular rate
 - You can include fringe benefits
 - No overhead costs
- Examples:
 - Site Manager
 - Quality 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
 - \checkmark 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
 - \checkmark Who, what, where, when
- Document, Document, Document
 - ✓ Cost, benefit, service, hours, value, rate
 - Basis for your calculations
 - ✓ Be clear and specific





Suggestions (continued)

- Include your progress in meeting the costs 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 | Dorrie Paar |
| 617-918-1389 | 617-918-1432 |
| byrne.james@epa.gov | paar.dorrie@ |
| | epa.gov |