Brownfields 2024 Assessment and Cleanup Breakout Session

Mike Kennedy—Assessment Coordinator

Paul Johnson—Cleanup Coordinator

FY25 Assessment and Cleanup Agenda

- FY25 Anticipated Offerings

- Assessment Key Documents

- Assessment General Requirements

- Assessment Process

- Cleanup Key Documents

- Cleanup General Requirements

- Cleanup Process

- Environmental Justice and Climate Change

- Other "GO TO" Resources

Grants versus Cooperative Agreements

*The purpose of a **Grant** is to provide assistance; there is generally little involvement by the sponsor, and the award instrument refers to general terms and conditions. **Cooperative Agreements (CA)** also provide assistance, but with <u>substantial involvement</u>, typically described in a set of specific terms and conditions.*

EPA

FY25 Assessment Grant offerings

- Community-wide Assessment Grants for States and Tribes
  - 5-year period of performance
  - Up to $2 million

- Assessment Coalitions
  - 4-year period of performance
  - Up to $1.2 million

- Community-wide Assessment
  - 4-year period of performance
  - Up to $500,000

EPA

FY25 Cleanup Grant offerings

- Three funding amount options
  - All have 4-year period of performance
  - $500,000
  - $2 million
  - $4 million

Assessment Grants

Key Documents

- Award Documents—Workplans—budgets & milestones; Key Contact Form

- Assessment Requirements

- Read your Terms and Conditions carefully and refer back to them regularly.
  - Substantial involvement
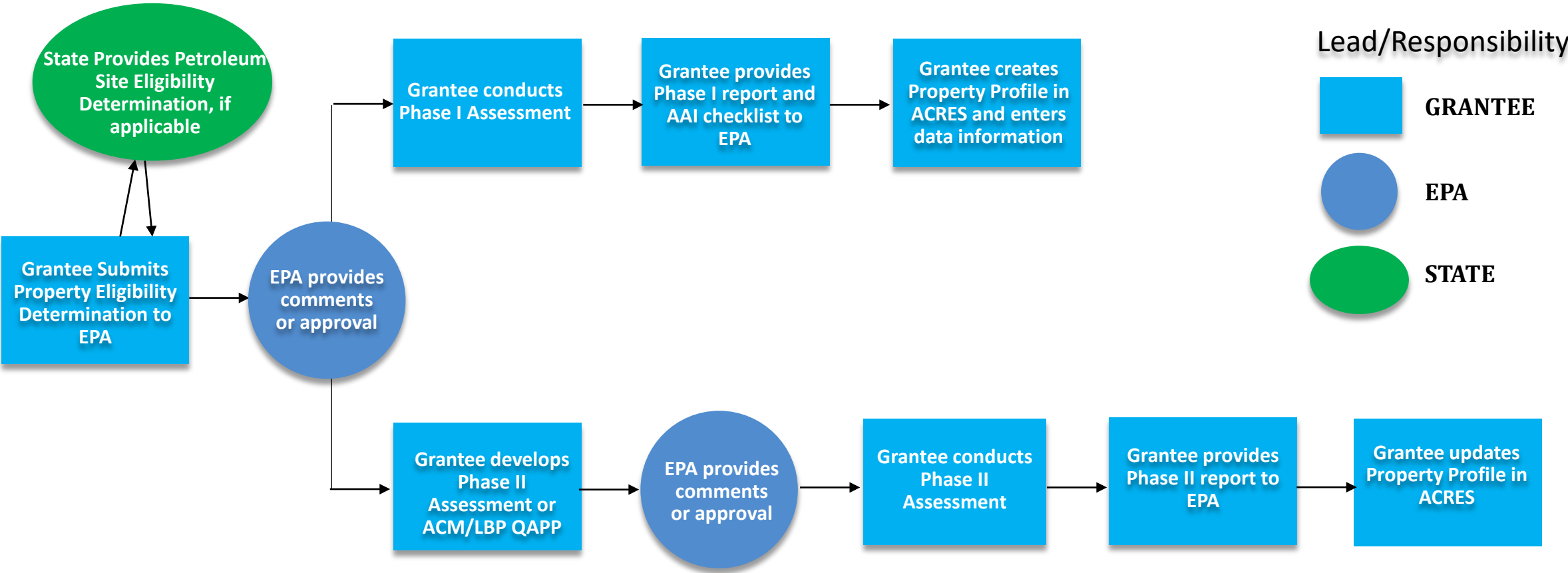 - 35% drawn down within the first 18 months

Requirements

Refer to the [Assessment Requirements](#) Document for dates and submission details for:

- Quarterly Reports
- Annual Financial Reporting
- Annual MBE/WBE Reporting
- Annual QMP Updates—New QMP Standard
- Reporting your accomplishments in ACRES database—Assessment, Cleanup, Redevelopment Exchange System

Additionally, you will have a Monthly Check-in Call with your Project Officer, a Quarterly Assessment Call with the Assessment Coordinator, Assessment Project Officers, and all Assessment Grantees; Regional and National Brownfields Conferences; and Quality Assurance Training in which you should/must participate.

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Process

State Provides Petroleum Site Eligibility Determination, if applicable

Grantee Submits Property Eligibility Determination to EPA

EPA provides comments or approval

Grantee conducts Phase I Assessment

Grantee provides Phase I report and AAI checklist to EPA

Grantee creates Property Profile in ACRES and enters data information

Grantee develops Phase II Assessment or ACM/LBP QAPP

EPA provides comments or approval

Grantee conducts Phase II Assessment

Grantee provides Phase II report to EPA

Grantee updates Property Profile in ACRES

Lead/Responsibility

GRANTEE

EPA

STATE

Notes

QAPP—Quality Assurance Project Plan
ACRES—Assessment Cleanup & Redevelopment Exchange System
ACM/LBP—Asbestos Containing Material/Lead Based Paint

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Process continued...

- Submit PED (Property Eligibility Form) to Project Officer for review; if the funds will be used for a petroleum site, request a State Letter, stating eligibility of the site and submit with PED. Be as complete and thorough as possible.
- For Phase I Environmental Site Assessments and Cleanup Plans (sometimes called a Phase III), the approval of the PED, is a GO!
- For Phase II Environmental Site Assessments, ACM/LBP (Asbestos Containing Materials/Lead-Based Paint) Surveys, the approved PED is contingent on submitting a QAPP (Quality Assurance Project Plan) or FSP (Field Sampling Plan) to your Project Officer for approval. This should be final when submitted. The signature of the Project Officer is your authorization to begin sampling. By law, we have a 30-day review period. A tracking number (QTRAK) will follow.

Environmental Justice and Climate Change

As a part of the Agency's Strategic Plan, EPA is committed to protecting human health and the environment for all, with an emphasis on historically overburdened and underserved communities. Part of that commitment will include addressing climate change and advancing environmental justice efforts.

Resources:
- Climate Smart Brownfields Manual
- EJ Screen
- Climate and Economic Justice Screening Tool

EPA REGION 6 CONTACTS

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List of EPA Region 6 Brownfields Contacts

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Cleanup Grants

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Key Documents

- Community Relations Plan (CRP)

- Analysis of Brownfields Cleanup Alternatives (ABCA)

- Quality Assurance Project Plan (QAPP)

- Cleanup Plan

- Award Documents—Workplans—budgets & milestones; Key Contact Form

- Read your Terms and Conditions carefully and refer back to them regularly.
  - Substantial involvement
  - 35% drawn down within the first 18 months

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Requirements

- Quarterly Reports (ACRES) **NEW**

- Annual Deliverables (MBE/WBE/DBE, FFR) Update QMP

- ACRES (Assessment, Cleanup and Redevelopment Exchange System) Data Entries

- Follow Workplan Milestones

- Regular Financial Drawdowns (quarterly if possible)

- Final Cleanup Report

- Refer to the Deliverables Requirements Document for dates and details

Requirements Continued
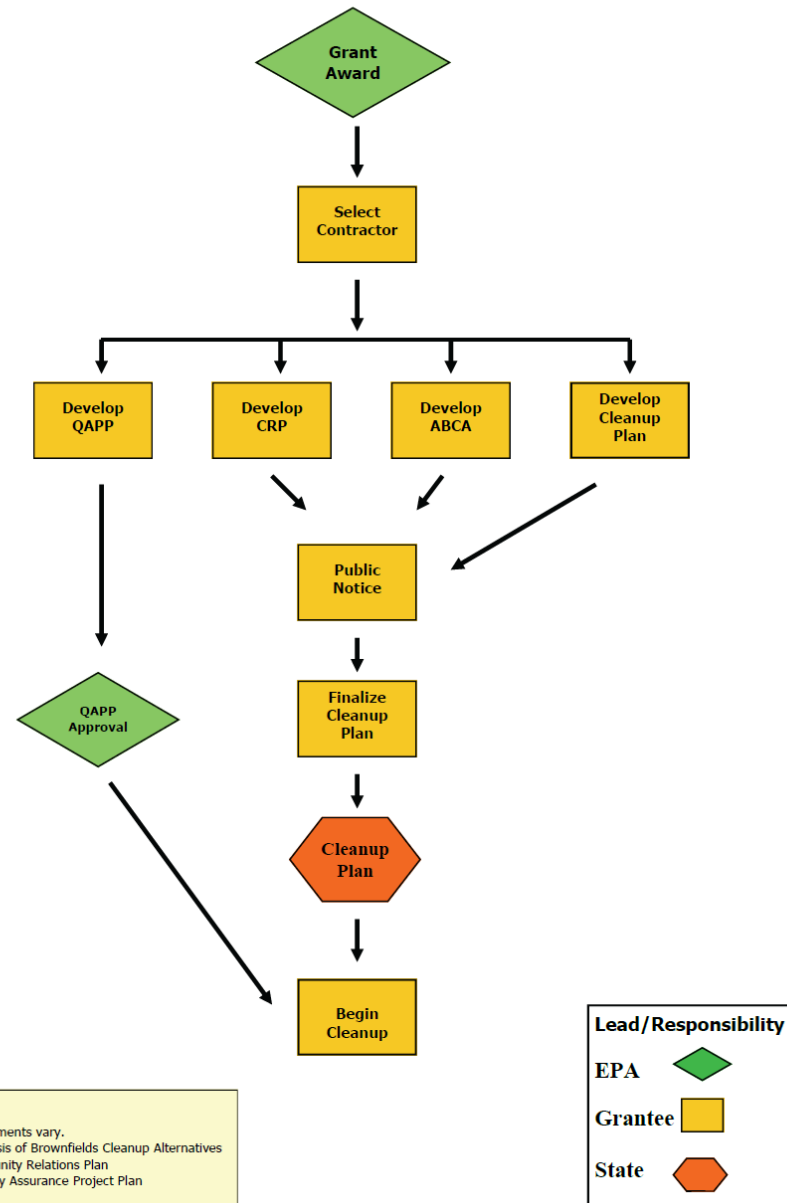
Monthly Check-in Calls with your Project Officer

Quarterly Cleanup Grantees Call

Regional and National Brownfields Conferences

Quality Assurance Training (PM & QM must take within first year of grant)

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Brownfields Cleanup — Flow Chart

Grant Award

Select Contractor

Develop QAPP

Develop CRP

Develop ABCA

Develop Cleanup Plan

Public Notice

QAPP Approval

Finalize Cleanup Plan

Cleanup Plan

Begin Cleanup

NOTES:

State requirements vary.
ABCA—Analysis of Brownfields Cleanup Alternatives
CRP—Community Relations Plan
QAPP—Quality Assurance Project Plan

Lead/Responsibility

EPA

Grantee

State

GRANTEE	STATE	EPA
APPROVAL— Who approves what? • Adherence to Davis-Bacon • Analysis of Brownfields Cleanup Alternatives • Compete for selection of contractor	• Cleanup Plan • Public Comment/Public Notice • Issue Certificate of Completion, No Further Action Letters • Institution Controls • Cleanup Report	• Quality Assurance Project Plan for cleanup
REVIEW— Who reviews what? • Site Manager reports • Cleanup contractor invoices • Davis-Bacon compliance by cleanup contractor – at least once • General liability/property insured • Subcontractor(s) and all other allowable/allocable cleanup contractors payment received/releases	• Confirmatory sampling • Site cleanup inspection during cleanup • Quality Assurance Project Plan for cleanup	• Community Relations Plan • Cleanup Plan
RECORD—Who maintains what records? • Community Relations Plan • Public Notice (affidavit), public comments • Analysis of Brownfields Cleanup Alternatives • Invoices/payments authorized for reimbursement against either grant • Loan recipient's cleanup & site manager contracts • Site Manager reports • Draw down documentation • Certification of Completion, No Further Action Letter, or Self-certification documentation • Site environmental condition characterization (opt.) • Institutional Control documentation • Quality Assurance Project Plan for Cleanup • Cost Share documentation	• Site environmental condition characterization report • Voluntary Cleanup Program application for site • Waived State VCP fees • Cleanup Plan • Public Notice (affidavit), public comments • Institutional Control documentation • Confirmatory sampling report • Certificate of Completion and/or No Further Action Letter	• Community Relations Plan • Quality Assurance Project Plan • Analysis of Brownfields Cleanup Alternatives • Public Notice (copy of notice is sufficient) • Approved Cleanup Report • Certificate of Completion, No Further Action Letter and/or self-certification documentation

This document is intended to help stakeholders be aware of key processes and milestones for cleanups with EPA grants. State specific requirements or cleanups not overseen by state (self certification cleanups) may cause variations from this matrix. This basic information relates to a typical process from grant award to cleanup. For more detail, please review the grant terms and conditions.

Brownfields Cleanup Cheat Sheet

Environmental Justice and Climate Change

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Resources:

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BROWNFIELDS RESOURCES

- Programmatic Requirements
- All Appropriate Inquires
- Best Practices for Procuring Services, Supplies, Equipment
- Guidance on Competitively Procuring a Contractor
- BF QAPP Roadmap
- Types of BF Grants

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BROWNFIELDS RESOURCES

- Subscribe to EPA Region 6 Weekly Brownfields Newsletter
    (email: Wendy.Ervin@epa.gov)
- Sign up with KSU-TAB (Technical Assistance to Brownfields grantee)
    website: ksutab.org
- Land Revitalization Technical Assistance
- Smart Growth
- Know your state regulators or your tribal environmental team
state contact list: https://www.epa.gov/brownfields/region-6-epa-and-state-brownfields-and-land-revitalization-contacts#State%20Contacts

We are all here to help you achieve your goals!!!

QUESTIONS?

EPA REGION 6 PROJECT OFFICER CONTACTS

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- Michael Kennedy (Kennedy.Michael@epa.gov) –Assessment Coordinator

List of EPA Region 6 Brownfields Contacts

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