

On September 24, 2024, EPA's Office of Brownfields & Land Revitalization held a live webinar to assist applicants with preparing the Narrative portion of their application for the Fiscal Year 2025 **Cleanup Grants and RLF Grants**. Below is a transcript of questions submitted by participants and EPA's response. Responses below may include additional information than what was provided during the webinar.

Note that **general application submission, the Narrative Information Sheet, and Threshold requirements**, were covered in the recording available on the [MARC Grant Application Resources – "Open Solicitations"](#) webpage under Pre-Recorded Videos on Minimum Grant Requirements.

If you have general questions about EPA's Brownfields Program, the content of the pre-recorded videos, or questions about a specific site for which you're seeking funding, please contact your Regional Brownfields Contact listed in Section VII. of the Guidelines. If you have questions on how to submit an application through www.grants.gov, please visit the "APPLICANTS" tab on the grants.gov website for information.

GENERAL QUESTIONS & ANSWERS
<p>Q: Where can I find the recording and the presentation?</p> <p>A: The webinar recording and a copy of the presentation are available on the MARC Grant Application Resources – "Open Solicitations" webpage (see Grant Guideline Outreach Webinars - Narrative Ranking Criteria).</p>
<p>Q: The project period is "up to" 4 years. Does this mean shorter periods will be issued?</p> <p>A: Yes, shorter periods may be issued if proposed by an applicant. Cleanup Grant applicants can propose a project period of up to 4 years, and RLF Grant applicants can propose a project period of up to 5 years.</p>
<p>Q: If a community has a cleanup need that is anticipated to be greater than \$500K but less than \$2M, which grant should they apply for and will they be penalized if they don't utilize all of the grant funding should they opt for the higher amount?</p> <p>A: No, applicants who request less than the maximum amount of funding will not be penalized. For selection purposes, EPA will prepare three ranked lists of applications. One list will be comprised of applicants requesting up to \$500,000. EPA expects to select approximately 30 applications in this category. A second list will be comprised of applicants requesting between \$500,001 and \$2,000,000. EPA expects to select approximately 23 applications in this category. A third list will be comprised of applicants requesting between \$2,000,001 and \$4,000,000. EPA expects to select approximately 10 applications in this category. For example, a request for \$1,000,000 will be included in the list of applications requesting between \$500,001 and \$2,000,000 and will not by default be evaluated less favorably.</p> <p>Note, under criterion 3.c. Cost Estimates, applicants will be evaluated on including cost estimates that are reasonable and realistic to implement the grant, so applicants should apply for a funding amount that they anticipate using.</p>

Cleanup Grants – General Questions/Eligibility

Q: Must an applicant own the site before the application submission deadline or is there any way to get an extension if the applicant is working to get ownership through the foreclosure of a brownfield?

A: Yes, to be eligible to receive a Cleanup Grant, the applicant must own the site that is the subject of its Cleanup Grant application by November 14, 2024. EPA will not allow an extension of time to meet the site ownership requirement for Cleanup Grants.

Q: If a facility has a consent order for cleanup, will it be eligible for a Cleanup Grant?

A: It depends. Facilities subject to an administrative or judicial order or consent decree are excluded from the definition of a brownfield site but may be eligible for funding if EPA makes a property-specific determination. Please review the FAQs in Section I. on property-specific determinations. Please contact your Brownfield representative listed at the end of the presentation or in Section VII. of the Guidelines for pre-application assistance on site eligibility.

Q: Does the Cleanup Grant application have to include a Phase II Environmental Site Assessment (ESA) or can the applicant include a statement that the results of the Phase II ESA will be in hand before the grant is awarded?

A: Yes, the Cleanup Grant application must include a Phase II environmental site assessment draft or final report. Per threshold criterion 8 under Section III.B. of the Cleanup Grant guidelines, a written ASTM E1903-19 or equivalent Phase II environmental site assessment report (a draft report is sufficient) must be completed prior to application submission. A statement that the Phase II will be complete before the grant is awarded is not sufficient. Refer to threshold criterion Section III.B.8. of the Cleanup Grant guidelines for additional information.

Q: As it relates to the site characterization letter required for Cleanup Grant applications, how do you determine if your site is eligible for the voluntary response program?

A: Please contact your State or Tribal Environmental Authority for information on their voluntary response program. The Brownfield representative listed at the end of this presentation or in Section VII. of the Guidelines can provide their contact information to you and can help answer additional questions on threshold requirements.

Q: For Cleanup Grants, are sites that require additional site characterization reviewed less favorably than those that are fully characterized?

A: No, whether a site requires additional characterization (beyond the required Phase II) does not by default mean the application will be evaluated less favorably. Per Threshold criterion 9, applicants selected for funding that indicate that additional assessment is needed to sufficiently characterize the site(s) for the remediation work to begin must provide EPA with information that demonstrates compliance with this requirement by June 15, 2025. If applicants do not meet this requirement by June 15, 2025, EPA may not make the award due to a failure to meet this requirement. For additional questions on threshold requirements, please contact the Brownfield representative listed at the end of this presentation or in Section VII. of the Guidelines.

RLF Grants – General Questions/Eligibility

Q: It appears in the guidelines that the maximum funding/timing is the same for both an individual entity applying for an RLF Grant vs. an RLF Coalition, but the coalition would require additional attachments. Can someone touch on the benefit of pursuing an RLF Grant as an RLF Coalition vs an individual entity?

A: That is correct that the maximum funding amount and period of performance are the same for an RLF managed by a coalition and by an individual entity. RLF Coalitions have a few additional requirements in both the threshold and narrative/ranking criteria. Applying as a coalition with another one to two entities can potentially help with broadening the geographic boundary where the RLF can operate and/or the coalition member may have skills and experience to manage a successful RLF that the lead does not have.

Q: Would an eligible entity that has an active RLF grant be able to separately act as a fund manager for a new RLF applicant?

A: Yes, an entity with an open RLF Grant could receive a subaward to act as a Fund Manager for another entity applying for a new RLF Grant. However, the entity with an open RLF Grant cannot be included as a non-lead member of the new RLF applicant's coalition or obtain additional funding through the new RLF Grant for loans and subawards for site cleanup.

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS & ANSWERS

Q: Can a targeted geographic area be an entire municipality or do applicants need to be more specific and identify a neighborhood and/or specific properties?

A: Yes, a geographic boundary can be an entire municipality. In response to criterion 1.a.i. Overview of Brownfield Challenges and Description of Target Area, RLF Grant applicants are asked to identify both the geographic boundary(ies) where they propose to conduct activities and their target area(s). The geographic boundary may be the jurisdiction of a unit of government. The specific target area(s) is where the applicant plans to focus grant activities, such as a neighborhood, district, corridor, or census tract.

COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS & ANSWERS

Q: Is it required that an applicant use CJEST?

A: No, however, for the Identification of Environmental Justice Issues criterion only, applications may only potentially earn full points if at least one of the priority/proposed sites is located in a disadvantaged community **as identified by CEJST**. Note that this does not apply to applications from Tribes, eligible Tribal entities, or territories.

In response to the Threats to Sensitive Populations subcriteria, applicants are encouraged to use EJScreen or CEJST to better understand the communities that may be adversely and disproportionately affected by environmental or human health harms and risks.

**TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS
QUESTIONS & ANSWERS**

**Q: Are Vapor Intrusion Mitigation Systems an allowable expense under a cleanup grant?
This was suggested in the closeout report by the oversight agency.**

A: It depends. If the selected remedy from the Analysis of Brownfield Cleanup Alternatives requires a Vapor Intrusion Mitigation System, then it is an eligible expense. Brownfield Grant recipients must ensure that cleanups meet all applicable federal and state laws and regulations, per the terms and conditions of the cooperative agreement.

**PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS & ANSWERS – no
questions were submitted for this criterion.**