

# Evaluation of the Status of American Recovery and Reinvestment Act-Funded Brownfield Site Cleanups

May 12, 2026 | Report No. 26-E-0030



## Abbreviations

ACRES	Assessment, Cleanup, and Redevelopment Exchange System
ARRA	American Recovery and Reinvestment Act
C.F.R.	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
OIG	Office of Inspector General
Pub. L.	Public Law
U.S.C.	United States Code

## Key Definition

Brownfield	The Small Business Liability Relief and Brownfields Revitalization Act defines a brownfield site as “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.”
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## Cover Image

Broad Avenue brownfield site, Central City, Pennsylvania. The picture shows a grassy area in the foreground and green hills in the background under a blue sky. Where the grassy area meets the hills, a tall flagpole stands flying an American flag. (EPA OIG image)

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# At a Glance

## Evaluation of the Status of American Recovery and Reinvestment Act-Funded Brownfield Site Cleanups

### Why We Did This Evaluation

#### To accomplish this objective:

The U.S. Environmental Protection Agency Office of Inspector General conducted this evaluation to determine whether American Recovery and Reinvestment Act grants for cleaning up brownfield sites achieved the Brownfields Program intent of cleaning up and reusing these sites. A brownfield site is defined as property where the redevelopment or reuse may be complicated by the presence of hazardous substances or pollutants.

In 2002, the Brownfields Program was established via statute “to promote the cleanup and reuse of brownfields.” The EPA established five performance measures for the program, including the number of sites cleaned up and the number made ready for anticipated use. In 2009, the EPA awarded \$7.3 million in American Recovery and Reinvestment Act funds via the Brownfields Program to clean up 38 brownfield sites in 19 states. The EPA’s application ranking system for these grants considered, among other things, the applicants’ ability to leverage non-EPA funds to complete the cleanups, since cleanup costs usually exceed what the EPA can fund by law. During each grant’s period of performance, which was typically three years, the Agency required recipients to enter their performance measures into an EPA database.

#### To support these EPA mission-related efforts:

- *Cleaning up and revitalizing land.*
- *Compliance with the law.*

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### What We Found

As of May 2025, of the 38 brownfield sites that received American Recovery and Reinvestment Act cleanup grants in 2009, 29 sites, or 76 percent, had achieved the Small Business Liability Relief and Brownfields Revitalization Act’s statutory intent of both cleanup and reuse of contaminated sites. Nine sites, or 24 percent, had not achieved that statutory intent. Specifically, five sites either were not fully cleaned up or had not submitted the required cleanup documentation to be designated as fully cleaned up, while four sites had been cleaned up but not yet reused. Of the five sites that were not fully cleaned up, three had nevertheless been reused.

The EPA could improve the internal controls that it uses to weigh and rank grant applicants on their ability to complete brownfield site cleanups. For example, even though the EPA gave one applicant a low score for its ability to leverage non-EPA funds to successfully complete the cleanup, that applicant still received a high enough overall score to be selected for a grant. That applicant’s site is one of the nine not achieving the Brownfields Program’s statutory intent. And although the EPA has no legal authority to require that grant recipients submit cleanup documentation or reuse information after grant closeout, it could improve its internal controls over the closeout phase to help mitigate the risk of unsubmitted documentation and incomplete cleanups.

Finally, the Agency’s database that records and tracks the Brownfields Program’s performance measures does not consistently contain complete information about the status of brownfield site cleanups, particularly about redevelopment activities and outcomes. This lack of complete information hampers the program’s efforts to document, assess, and report its accomplishments.

**If grant recipients do not clean up and reuse their brownfield sites, the full statutory intent of the Small Business Liability Relief and Brownfields Revitalization Act will not be met.**

### Recommendations and Planned Agency Corrective Actions

We make two recommendations to the assistant administrator for Land and Emergency Management: to review the application ranking system used to select brownfield site cleanup grants and to add standardized questions to the grant closeout checklists that address brownfield site status, entry of Brownfields Program information into the EPA database, and submission of required cleanup documentation. The Agency agreed with these two recommendations, which are resolved with corrective actions pending.



**OFFICE OF INSPECTOR GENERAL**  
U.S. ENVIRONMENTAL PROTECTION AGENCY

May 12, 2026

**MEMORANDUM**

**SUBJECT:** Evaluation of the Status of American Recovery and Reinvestment Act-Funded  
Brownfield Site Cleanups  
Report No. 26-E-0030

**FROM:** Nicole N. Murley, Deputy Inspector General performing the duties  
of the Inspector General *Nicole N. Murley*

**TO:** Thomas Croci, Acting Assistant Administrator  
Office of Land and Emergency Management

This is our report on the subject evaluation conducted by the U.S. Environmental Protection Agency Office of Inspector General. The project number for this evaluation was [OSRE-FY25-0052](#). This report contains findings that describe the problems the OIG has identified and corrective actions the OIG recommends. Final determinations on matters in this report will be made by EPA managers in accordance with established audit resolution procedures.

In accordance with EPA Manual 2750, your office provided acceptable corrective actions and estimated milestone dates for Recommendations 1 and 2. These recommendations are resolved. A final response pertaining to these recommendations is not required; however, if your office submits a response, it will be posted on the OIG's website, along with our memorandum commenting on the response. If a response is submitted, it should be provided as an Adobe PDF file that complies with the requirements of section 508 of the Rehabilitation Act of 1973, as amended. It should also not contain data that your office does not want released to the public; if the response contains such data, your office should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at [www.epa.gov/oig](http://www.epa.gov/oig).

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# Chapter 1

## Introduction

### Purpose

The U.S. Environmental Protection Agency Office of Inspector General initiated this evaluation to determine whether American Recovery and Reinvestment Act, or ARRA, grants for cleaning up brownfield sites achieved the Brownfields Program intent of cleaning up and reusing these sites.

### Background

A brownfield site is defined as “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.”<sup>1</sup> According to the Internal Revenue Service, real property is defined as “land and improvements to land.”<sup>2</sup> A site may be classified as a brownfield if it was formerly used in a way that left behind hazardous substances. For example, it may have been an industrial site or mine. An EPA [web page](#) states that cleaning up and reinvesting in brownfield sites reduces risks to public health and the environment.<sup>3</sup> Furthermore, cleaning up and reinvesting in brownfield sites decreases the development pressure on noncontaminated spaces and working lands, while it increases employment opportunities, investments, and tax bases, ultimately benefiting local economies.

### *The EPA’s Brownfields Program*

The U.S. Government Accountability Office reports that there are more than 450,000 brownfield sites in the United States. According to the EPA, it began providing funding to local governments in the mid-1990s to conduct site investigations and assessments of contaminated land; these pilot projects set the stage for the EPA’s current Brownfields Program. Along with this initial funding, the EPA developed guidance and tools for local governments to use when cleaning up and redeveloping the contaminated sites. In 2002, the Brownfields Program was established via the Small Business Liability Relief and Brownfields Revitalization Act, Pub. L. No. 107-118. This Act amended the Comprehensive Environmental Response, Compensation, and Liability Act “to promote the cleanup and reuse of brownfields” by providing funds to eligible recipients to assess and clean up brownfield sites.<sup>4</sup>

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<sup>1</sup> Comprehensive Environmental Response, Compensation, and Liability Act § 101(39)(A).

<sup>2</sup> 26 C.F.R. § 1.856-10(b).

<sup>3</sup> EPA, *Brownfields: About*, <https://www.epa.gov/brownfields/about> (last visited March 12, 2026).

<sup>4</sup> The Comprehensive Environmental Response, Compensation, and Liability Act is codified at 42 U.S.C. §§ 9601–9675. In this report, we use the terms “reuse” and “redevelopment” interchangeably. The Brownfields grant program provisions are codified at 42 U.S.C. § 9604(k).

### What is the Comprehensive Environmental Response, Compensation, and Liability Act?

Commonly referred to as Superfund, the Comprehensive Environmental Response, Compensation, and Liability Act was passed in 1980 and established a federal program to clean up contaminated sites. The difference between Superfund sites and brownfield sites lies in the degree of the contamination, with Superfund sites being more severely contaminated. The federal government is usually directly involved in the cleanup of Superfund sites, while contamination on brownfield sites is often addressed through state and local programs.

As explained in the preamble of the Small Business Liability Relief and Brownfields Revitalization Act, the intent of the Act is:

To provide certain relief for small businesses from liability under the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, and to amend such Act to promote *the cleanup and reuse* of brownfields, to provide financial assistance for brownfields revitalization, to enhance State response programs, and for other purposes. (emphasis added)

Furthermore, the legislative history of the statute conveys the congressional intent of reusing brownfield sites and revitalizing the land and economy. Since the enactment of the Small Business Liability Relief and Brownfields Revitalization Act, the EPA has supported and implemented the Brownfields Program's statutory intent via:

- Agency guidance and planning documents.
- Performance measures tracking the number of dollars and jobs leveraged as a result of the cleanup and redevelopment of brownfield sites.<sup>5</sup>
- Other products, such as informational brochures, brownfields grant application guidelines, and assessments of the program's redevelopment accomplishments.

Appendix A includes a chronological list of the Agency's guidance, actions, and documentation supporting the Brownfields Program's intent, some of which we detail in the following subsections.

By law, the EPA is required to establish a system of ranking grant applications that includes 12 criteria.<sup>6</sup> These ranking criteria ensure that the EPA assesses each brownfield site cleanup grant application based

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<sup>5</sup> According to the EPA's *Brownfields Program Measure Definitions*, dated May 2025, "the term 'leveraged' refers to those non-EPA Brownfields funds and activities that have some link or nexus to the efforts of an EPA cooperative agreement-funded activity. Leveraged activities and accomplishments are results/outcomes where the EPA-funded activity was a catalyst for the leveraged activity or accomplishment."

<sup>6</sup> The Brownfields Utilization, Investment, and Local Development Act, passed as part of the Consolidated Appropriations Act, 2018, Pub. L. No. 115-141, added two criteria to the Small Business Liability Relief and Brownfields Revitalization Act's original ten criteria that the EPA must consider when ranking grant applications.

on a variety of factors. Of particular note, two of the 12 criteria specifically measure how effectively a brownfields project will be able to reuse the contaminated property:

- “The extent to which a grant will stimulate the availability of other funds for environmental assessment or remediation, and subsequent reuse, of an area in which one or more brownfield sites are located.”
- “The potential of the proposed project or the development plan for an area in which one or more brownfield sites are located to stimulate economic development of the area on completion of the cleanup.”

According to the EPA, the Small Business Liability Relief and Brownfields Revitalization Act codified many of the EPA’s brownfields practices, policies, and guidance documents. In addition to establishing the Brownfields Program, the Act clarified Comprehensive Environmental Response, Compensation, and Liability Act liability protections. The Small Business Liability Relief and Brownfields Revitalization Act also provided funds to enhance the EPA’s State and Tribal Response Program, which in turn assists state and tribal voluntary cleanup response programs.

**What are the EPA’s State and Tribal Response Program and the state and tribal voluntary cleanup response programs?**

The EPA’s State and Tribal Response Program provides resources to assist states and tribes with the cleanup and reuse of brownfield sites located within their borders. Under this federal program, states and tribes can establish their own voluntary cleanup programs for brownfield sites. As the name suggests, brownfield sites are not required to enroll in a state or tribal voluntary cleanup response program. However, if they do so, the public is provided “with the confidence” that the EPA and the state “are working in a coordinated manner.” The public also has the assurance that the state will review the cleanup efforts of each enrolled brownfield site to ensure that it “poses no unacceptable risks to human health or the environment” before it is reused.

—EPA’s “State and Tribal Brownfields Response Programs” [web page](#)

Additional statutes increased the funds flowing to and through the Brownfields Program. The Brownfields Utilization, Investment, and Local Development Act of 2018 increased the amount of available grant funds for brownfield sites and expanded eligibility for these funds to nonprofit organizations, among other things. Also, under the 2021 Infrastructure Investment and Jobs Act, Pub. L. No. 117-58, Congress appropriated \$1.5 billion from fiscal year 2022 through 2026 for brownfields revitalization projects.

## ***The EPA Awarded American Recovery and Reinvestment Act Funds to Clean Up Brownfield Sites***

ARRA, Pub. L. No. 111-5, was signed into law in 2009. The law provided \$100 million in stimulus funds to the Brownfields Program for grants under 42 U.S.C. § 9604(k) to evaluate and clean up former industrial and commercial sites. Under ARRA, the EPA provided financial assistance to eligible applicants through four competitive cooperative agreement programs:<sup>7</sup>

- Assessment. Recipients were to use these funds for brownfield site environmental assessments, community involvement activities, and cleanup planning.
- Revolving loan fund. Recipients were to use these funds to carry out cleanup activities at brownfield sites. Revolving loan fund grants enable a grant recipient, such as a state, to capitalize a “revolving” fund that provides loans and subgrants to brownfield site owners to carry out cleanups. The owners repay the money back to the fund, which then provides loans to other borrowers, representing an ongoing source of capital within a community.
- Cleanup. Recipients were also to use these funds to clean up brownfield sites. Cleanup grants provide funds directly to brownfield site owners to carry out cleanup activities.
- Job training. Recipients were to use these funds to provide training in the environmental field to unemployed and underemployed residents in communities impacted by brownfield sites.

For simplicity hereafter in this report, we use the more general term “grants” instead of the term “cooperative agreements.” Our evaluation focuses on the third grant program listed above, specifically the ARRA cleanup grants awarded in September 2009.

By September 2009, the EPA awarded a total of \$7.3 million via ARRA cleanup grants to 31 recipients. These funds supported the cleanup of 38 brownfield sites in 19 states, as shown in Figure 1.<sup>8</sup> In accordance with statutory requirements at that time, the EPA awarded up to \$200,000 per site.<sup>9</sup> The performance period for these grants was up to three years from the date of the award. This means that the recipients had to complete cleaning up these sites by September 2012, except if they had negotiated an extension of this deadline with the EPA.

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<sup>7</sup> According to the EPA’s *American Recovery and Reinvestment Act of 2009: Environmental Protection Agency Recovery Act Program Plan: Brownfields and Land Revitalization*, dated May 15, 2009, cooperative agreements are a type of grant. Typically, for projects funded by cooperative agreements, “the EPA will be substantially involved in the project and will work closely with the recipient.”

<sup>8</sup> Four of the 31 recipients received ARRA grant funds to clean up two or more sites.

<sup>9</sup> The Brownfields Utilization, Investment, and Local Development Act of 2018 raised the cap on cleanup grant amounts from \$200,000 to \$500,000 per site, with the flexibility for up to \$650,000 per site. Also, Infrastructure Investment and Jobs Act funds for certain brownfield activities allowed up to \$5 million per site cleanup.



## **Grant Closeout**

Grant closeout is the systematic process that the EPA uses to determine whether a recipient has completed all required technical work under a grant and to confirm that a grant recipient has met all applicable financial and administrative requirements. The closeout process begins once all work has been completed or the project performance period has expired.<sup>11</sup> Under federal grant regulations contained in 2 C.F.R. § 200.344, grant recipients must submit closeout reports within 120 days of the end of the performance period unless the EPA agrees to a time extension.

The ARRA cleanup grants require recipients to ensure that the successful completion of a cleanup is properly documented. This cleanup documentation can be a final report or letter from a qualified environmental professional, or it can be documentation provided by a state or tribal voluntary cleanup response program that shows the cleanup is complete. The cleanup documentation is included as part of the administrative record.<sup>12</sup> As provided in the ARRA cleanup grant agreement terms and conditions, if a grant recipient is unable or unwilling to complete the cleanup, then the recipient must ensure that the site is secure. For example, the recipient could fence the site off so that the public cannot access it.

The EPA's regional offices are responsible for monitoring and closing out the ARRA cleanup grants. According to the EPA's Office of Brownfields and Land Revitalization personnel, the legal reporting and oversight requirements between the EPA and a grant recipient end when a grant is closed. As a result, the EPA may not be informed of the redevelopment status of a site because the recipient is not required to report this information to the EPA after the grant is closed.

## **Performance Measures for the Brownfields Program**

To meet Government Performance and Results Act requirements,<sup>13</sup> the EPA established five performance measures by which to assess the Brownfields Program. According to the EPA, these performance measures have been in place since at least 2009, and the EPA formally defined them in its *Brownfields Program Measure Definitions*, dated May 2025. Table 1 outlines the five performance measures.

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<sup>11</sup> According to 2 C.F.R. § 200.344, when the recipient or subrecipient fails to complete the necessary administrative actions or the required work for an award, the federal agency or pass-through entity must proceed with closeout based on the information available.

<sup>12</sup> As stated in the applicable terms and conditions for the grants, recipients are required to establish an administrative record containing documents that form the basis for the cleanup plan selection. The terms and conditions specify that documents in the administrative record include "an analysis of reasonable alternatives including no action; site investigation reports; the cleanup plan; cleanup standards used; responses to public comments; and verification that shows that cleanup is complete."

<sup>13</sup> The Government Performance and Results Act requires federal agencies to develop plans for what they intend to accomplish, to measure how well they are doing, to make appropriate decisions based on the information gathered, and to communicate about their performance to Congress and the public.

**Table 1: Brownfields Program performance measures**

Measure	Metric used	Details
<b>Properties assessed</b>	Number of properties that have been environmentally assessed for the first time using EPA Brownfields funding, as reported by cooperative agreement recipients.	—
<b>Properties cleaned up</b>	Number of properties that have been cleaned up using EPA Brownfields funding to a regulatory risk-based standard and have engineering controls in place (as needed), as reported by cooperative agreement recipients.	<p>Cleanup may be considered complete when all on-site property cleanup activities are completed to a regulatory risk-based standard.</p> <p>Cleanup activities are completed in conjunction with one of the following conditions:</p> <ol style="list-style-type: none"> <li>1. A no further action letter (or its equivalent) has been issued by the state or tribe under its voluntary response program (or its equivalent) for cleanup activities at the property; or</li> <li>2. The cooperative agreement recipient, upon the recommendation of an environmental professional, has determined and documented that on-property work is finished. Ongoing operation and maintenance activities or monitoring may continue after a cleanup completion designation has been made.</li> </ol> <p>A property may be considered cleaned up prior to receiving the documentation above, if all physical on-site activities are complete including any required engineering controls.</p>
<b>Jobs leveraged</b>	Number of cleanup and redevelopment jobs leveraged by assessment or cleanup activities conducted with EPA Brownfields funding, as reported by cooperative agreement recipients at a specific property.	These are numbers reported by recipients that are based on actual (not estimated) jobs resulting from environmental work at the site or the redevelopment of the site.
<b>Dollars leveraged</b>	Number of additional committed dollars leveraged by assessment or cleanup activities conducted with EPA Brownfields funding, as reported by cooperative agreement recipients at a specific property.	—
<b>Acres or properties made ready for anticipated use (RAU)</b>	Properties and Acres associated with those properties benefiting from EPA Brownfields funding that have been assessed and determined not to require cleanup, or where cleanup has been completed and any required institutional controls are in place, as reported by cooperative agreement recipients.	For properties that have been cleaned up, the cooperative agreement recipient must have received a No Further Action letter or have equivalent documentation that states any necessary cleanup and institutional controls are complete/in place.

Source: EPA, *Brownfields Program Measure Definitions*, May 2025. (EPA OIG table)

Note: “Cooperative agreement recipients” refers to grant recipients.

To gather metrics about the Brownfields Program, the EPA requires all Brownfields Program grant recipients, including the ARRA grant recipients, to report their assessment, cleanup, and redevelopment activities during the period of performance of the grant. This reporting is done via an online database called the Assessment, Cleanup, and Redevelopment Exchange System, or ACRES. According to the Agency, ACRES is meant to document site-specific work completed using EPA funds during the grant's period of performance. The Agency restricts database users to recipients of brownfields grants and to Brownfields Program staff. Among the data that are reported into ACRES are site location; a list of contaminants at the site; cleanup start and completion dates; whether institutional and engineering controls, if applicable, are in place; whether a site has been made ready for anticipated use; redevelopment start and completion dates; and jobs and dollars leveraged for cleanup and redevelopment. The EPA uploads site-specific data from ACRES to the interactive "Cleanups in My Community" mapping [system](#), which allows the public to view the location and status of sites being cleaned up under EPA programs, including the Brownfields Program.

According to the EPA's *Brownfields Program Measure Definitions*, cleanup activities are completed in conjunction with the issuance of a "no further action letter" or equivalent document from the responsible state or tribal voluntary cleanup response program. Before it issues such a letter, the state or tribal voluntary cleanup response program must be satisfied that the brownfield site was cleaned up to the level deemed necessary for its intended use. According to an EPA [web page](#), state and tribal voluntary cleanup response programs employ a risk-based standard, which considers how the site will be reused, to determine the required cleanup level. For example, residential use would require more cleanup, while industrial use would require less cleanup. Generally, before issuing a no further action letter, state and tribal voluntary cleanup response programs require brownfield sites to submit various documentation, such as remedial action completion reports, that detail the cleanup remedies implemented, including any engineering controls. Some state and tribal voluntary cleanup response programs may also require institutional controls, such as an environmental covenant, to be in place before issuing a no further action letter or an equivalent. In addition, state and tribal voluntary cleanup response programs may condition some "no further action" decisions on ongoing compliance with the engineering or institutional controls that were implemented to prevent exposure to any contaminants left in place.

#### **What is an environmental covenant?**

An environmental covenant is a legal recorded document that limits certain uses of a property, such as drilling a water supply well, disturbing pavement that covers contaminated areas, and residential use of the property.

According to the EPA's *Brownfields Program Measure Definitions*, a site may be considered "cleaned up" prior to receiving a no further action letter or equivalent "if all physical on-site activities are complete including any required engineering controls."<sup>14</sup> However, the document further explains that for a site

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<sup>14</sup> EPA, *Brownfields Program Measure Definitions*, May 2025.

to be reported as “ready for anticipated use” in ACRES, it must have received a no further action letter or an equivalent document from the state or tribal voluntary cleanup response program stating that any necessary cleanup is complete and institutional controls are in place. The “ready for anticipated use” performance measure does not mean that a site has been redeveloped, but rather that the site is ready to proceed to development.

## Responsible Offices

The EPA Office of Land and Emergency Management’s Office of Brownfields and Land Revitalization implements the Brownfields Program. The program provides grants and technical assistance to help various communities, states, and tribes prevent, assess, safely clean up, and sustainably reuse formerly contaminated properties. The EPA’s budget for implementing the Brownfields Program in fiscal year 2025 was \$168.1 million.

## Scope and Methodology

We conducted this evaluation from April 2025 to January 2026 in accordance with the *Quality Standards for Inspection and Evaluation* published in December 2020 by the Council of the Inspectors General on Integrity and Efficiency. Those standards require that we perform the evaluation to obtain sufficient and appropriate evidence to support our findings.

To obtain an understanding of the Brownfields Program, we reviewed the 2002 Small Business Liability Relief and Brownfields Revitalization Act and the 2018 Brownfields Utilization, Investment, and Local Development Act. We reviewed the 2009 ARRA as it pertains to funding for the Brownfields Program. We reviewed EPA program policies, guidance, and performance measures. We also reviewed the *FY09 Proposal Guidelines for Brownfields Cleanup Grants* and *FY25 Guidelines for Brownfield Cleanup Grants*. The fiscal year 2009 proposal guidelines were in effect at the time applicants applied for the ARRA cleanup grants that we assessed.

We identified the recipients of the 2009 ARRA cleanup grants from the EPA’s archived list of recipients of ARRA brownfields grants. We searched the EPA’s internal financial database to determine the amount of ARRA funds disbursed to each identified recipient for each site and to identify other relevant information, such as the performance period of the grants.

We searched ACRES for the 38 brownfield sites that received the 2009 ARRA cleanup grants to determine whether they have been cleaned up; made ready for anticipated use, including how many acres have been made ready for anticipated use; and reused. We researched whether the 38 sites were being used by reviewing the most recent publicly available satellite images and street views of the sites. For those sites that we determined were being used, we reviewed historical satellite images and historical street views to confirm that a transformation or redevelopment of the sites had occurred since 2009, which would indicate *reuse* of the site. If necessary, we also reviewed satellite images and street views prior to 2009. To confirm that the reuse plans outlined in the fact sheet for each ARRA cleanup grant occurred as stated, we searched online resources to determine who owned or occupied the building structures at

the sites. We visited two sites to determine whether they had been reused or to confirm their reuse plans because we could not find sufficient information online about the status of the sites.

We interviewed all ten EPA regional Brownfields Offices to obtain their perspectives on the Brownfields Program intent, the grant recipient selection process, grant monitoring, ACRES reporting, and the status of brownfield sites awarded the 2009 ARRA cleanup grants. As needed, we contacted the state and tribal voluntary cleanup response programs and the grant recipients to confirm whether the 38 brownfield sites had been cleaned up and made ready for anticipated use.

## Prior Reports

In EPA OIG Report No. [12-R-0898](#), *EPA Can Improve Its Reporting of Dollars Leveraged From the American Recovery and Reinvestment Act Brownfields Program*, issued September 27, 2012, we determined whether the results reported for the EPA ARRA brownfields assessment, cleanup, and revolving loan fund grants were timely and accurately reported, as well as whether the grants achieved their intended goals in terms of outputs and outcomes. The report detailed that EPA project officers verified the outputs and outcomes reported by the grant recipients for the ARRA brownfields assessments completed, acres ready for reuse, and cleanups completed but not always for the dollars leveraged. We recommended that the EPA create a checklist for grant recipients and project officers that defines dollars leveraged and identifies specific types of supporting documents needed. We also recommended that the EPA include a letter in grant closeout packages reminding grant recipients of their responsibility to continue to report dollars leveraged as those dollars are realized. The EPA agreed with our two recommendations and completed the corrective actions but emphasized that the EPA's legal relationship with recipients generally ends when the grant performance period expires. We note that this 2012 audit did not determine the cleanup or reuse status of all 38 sites receiving ARRA cleanup grants. Rather, the 2012 audit examined 20 grants that it selected from the 171 ARRA assessment, cleanup, and revolving loan fund grants.

## Chapter 2

### Most ARRA Cleanup Grants Achieved the Statutory Intent of Both Cleanup and Reuse of Contaminated Sites

As of May 2025, of the 38 brownfield sites that received ARRA cleanup grants in 2009, 29 sites, or 76 percent, had achieved the Comprehensive Environmental Response, Compensation, and Liability Act's statutory intent for the Brownfields Program of both cleanup and reuse of contaminated sites. However, nine sites, or 24 percent, had not achieved that statutory intent. Two of these nine sites were not fully cleaned up because they lacked sufficient funds, including one site that was selected for an ARRA cleanup grant despite doubts from two EPA application reviewers that the recipient would have the funds to finish the cleanup. Another three sites did not, by the time their grants closed, submit the required documentation that would allow the responsible state or tribal voluntary cleanup response program to assess the sufficiency of their cleanups and their institutional and engineering controls.<sup>15</sup> As a result, these three sites were never officially designated as cleaned up and ready for anticipated use when their grants closed. Finally, four sites were cleaned up but not reused.

These conditions resulted, in part, from the EPA's need to improve the internal controls used to weigh and rank applicants on their ability to complete brownfield site cleanups. The EPA also has limited ability to ensure that grant recipients either complete their cleanups before or continue reporting on project status after their grants close. If the EPA does not revise the application ranking system for brownfield site cleanup grants, there is a risk that more brownfield cleanup applications will be selected for funding even if application reviewers are concerned about the applicants' ability to leverage sufficient funds for site cleanup and subsequent reuse. Also, if grant recipients do not complete cleanups before the performance period of the grant ends and the grants are closed, oversight of brownfield site cleanups may be impeded.

### Seventy-Six Percent of ARRA Cleanup Grants Have Achieved the Statutory Intent of Cleanup and Reuse of Contaminated Sites

Of the 38 ARRA-funded brownfield site cleanups that we evaluated, 33 sites have been fully cleaned up, and five have not. Of the 33 sites that have been cleaned up, four have not been reused. This means that, a total of nine sites, or 24 percent of the 38 sites receiving ARRA cleanup grants, have not achieved the full statutory intent of both cleanup and reuse of contaminated sites. Appendix B lists the status of all 38 ARRA-funded brownfield site cleanups that we evaluated, while Table 2 provides additional details about the nine sites that have not fully achieved the statutory intent of cleanup and reuse of contaminated sites.

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<sup>15</sup> For purposes of this report, "fully cleaned up" means both cleaned up and ready for anticipated use as supported by a no further action letter or other equivalent.

**Table 2: Status of nine brownfield sites that have not fully achieved the statutory intent of cleanup and reuse of contaminated sites, as of May 2025**

Status*	Brownfield site name	Details
Not fully cleaned up†	<p><b>14 South Common Street</b> North Brookfield, Massachusetts</p>	<p>According to the EPA project officer for this ARRA cleanup grant, the grant recipient did not have sufficient funds to complete the site cleanup and has not been able to secure additional funds since the grant closed in October 2012. In 2018, the Central Massachusetts Regional Planning Commission received a \$300,000 EPA grant to conduct assessments and cleanup planning for eight brownfield sites, including this one. The planning commission completed a limited environmental review and prepared a recreational redevelopment concept for the site. The report has been finalized, but as of April 2025, the cleanup still had not been completed.</p>
Not fully cleaned up	<p><b>Lee Place</b> Plainfield, New Jersey</p>	<p>According to Region 2 Brownfields Program personnel, the recipient of this ARRA cleanup grant did not have sufficient funds to complete the site cleanup and has not been able to secure additional funds since the grant closed in April 2013. After the ARRA grant closed in 2013, the recipient received a \$222,451 grant from the New Jersey Hazardous Discharge Site Remediation Fund to assess and investigate migration pathways and impacts from soil and groundwater contamination that remained on-site. This assessment and investigation resulted in an interim remediation investigation report in 2018. As of May 2025, the report had not been finalized, and the cleanup still had not been completed.</p>
Not fully cleaned up	<p><b>Former H.J. Mills Property, Assessor’s Map 30 Lot 49-50</b> Bristol, Connecticut</p>	<p>This site has been redeveloped into a public parking lot, but according to the Connecticut Department of Energy and Environmental Protection, the recipient of this ARRA cleanup grant has not submitted the required documents so that the state voluntary cleanup response program can designate the site as cleaned up and ready for anticipated use. Specifically, the recipient did not submit:</p> <ul style="list-style-type: none"> <li>• A request for an alternative post-remediation groundwater monitoring program to reduce the monitoring requirements to four events over a one-year period.</li> <li>• An environmental land use restriction to render the remaining soil and groundwater in compliance with remediation standard regulations. Site restrictions include the prohibition of residential use, the prevention of subsurface soil disturbance, and a limit on the construction of buildings.</li> <li>• A site verification report.</li> </ul> <p>According to the EPA project officer for this ARRA cleanup grant, at the time the grant closed, the state voluntary cleanup response program would not sign off on the site as being cleaned up because groundwater monitoring was needed to assess whether the engineering controls were working.</p>
Not fully cleaned up	<p><b>Former H.J. Mills Property, Assessor’s Map 30 Lots 61-1A and 61-2</b> Bristol, Connecticut</p>	<p>The same details for the site listed above, Lot 49-50, apply to this site.</p>

Status*	Brownfield site name	Details
Not fully cleaned up	<b>NSC Plating and Polishing Company</b> Newark, New Jersey	The site has been redeveloped into a Department of Public Works service center for the drop-off of trash, bulk waste, and recycling; however, according to the New Jersey Department of Environmental Protection, the recipient of this ARRA cleanup grant has not submitted any of the required documentation for the state voluntary cleanup response program to assess the sufficiency of the site cleanup. Based on publicly available satellite images and street views, the site was redeveloped in 2019. We note that the recipient submitted documentation for its two other ARRA-funded site cleanups, as detailed in Appendix B.  We reached out to the recipient to inquire whether the site has been cleaned up. The recipient provided us with a copy of the remedial action report that discussed the closure and removal of one 3,000-gallon fuel oil underground storage tank. This report did not discuss the other remediation steps that were noted in the site's ACRES profile, such as the removal of contaminated soil beneath the concrete flooring of the former plating room, groundwater monitoring, and an institutional control to prohibit potable wells in the contaminated plume.
Cleaned up but not reused	<b>Broad Avenue Property</b> Central City, Pennsylvania	The intent was to build homes on this site after cleanup. According to property tax records, at least four parcels of land have been sold since the cleanup was completed, but as of June 2025, no homes had been built in the residential development.
Cleaned up but not reused	<b>Former gas station</b> Newark, New Jersey	According to property tax records, since the cleanup was completed, the recipient of this ARRA cleanup grant sold the property to a developer on June 30, 2017, but as of September 2025, the developer had not redeveloped the site.
Cleaned up but not reused	<b>Fostoria Glass Plant</b> Moundsville, West Virginia	According to modifications to the voluntary remediation agreement with the state voluntary cleanup response program, the recipient of this ARRA cleanup grant transferred ownership of the property to the remediation company that cleaned up the site. Since the cleanup was completed on June 10, 2013, the remediation company has not been able to attract any developers to redevelop the site for nonresidential use. The remediation company is now interested in cleaning up the site further for residential use.
Cleaned up but not reused	<b>Experience Motel</b> West Sacramento, California	According to ACRES, the site was cleaned up on November 5, 2010. The recipient of this ARRA cleanup grant, however, waited until it could acquire additional adjacent properties to accommodate a high-density, mixed-use development project consistent with the city's master plan. The city anticipates construction to begin in 2026 or 2027.

Source: OIG summary of evaluation findings. (EPA OIG table)

*Note:* The yellow shading in the first five rows corresponds to the five sites that have not been fully cleaned up, while the green shading in the last four rows corresponds to the four sites that have been cleaned up but not reused.

\* Regarding sites that have not been fully cleaned up, the reporting and oversight requirements between the EPA and the grant recipient end when a grant is closed. Regarding sites that have been cleaned up but not reused, there is not a statutory requirement for the Agency to ensure that brownfield sites will be reused.

† ACRES and the "Cleanups in My Community" mapping system list the 14 South Common Street site as cleaned up, which is misleading. While a portion of the site was cleaned up, the entire site has not been fully cleaned up.

Of the five sites listed in Table 2 as “not fully cleaned up,” it is important to note that three have nevertheless been reused: the two Former H.J. Mills Property sites in Bristol, Connecticut, and the NSC Plating and Polishing Company site in Newark, New Jersey. Also, we note that two of the 29 remaining brownfield sites not listed in Table 2—Sanford Mill in Sanford, Maine, and Jordan Valley West Meadows Site 4 in Springfield, Missouri—did not file environmental covenants when their cleanups were completed in 2013 and 2011, respectively. After we asked about the institutional controls for these sites, the state voluntary cleanup response programs and grant recipients began the process of establishing the necessary environmental covenants. According to Region 1 staff, on June 17, 2025, Maine provided the EPA with documentation stating that institutional controls are in place at Sanford Mill. According to the Jordan Valley West Meadows Site 4 grant recipient, once the necessary environmental covenant is in place for that site, the state voluntary cleanup response program will issue a certificate of cleanup completion, which was anticipated to occur in August or September 2025.

We also note that of the 32 sites that have been reused,<sup>16</sup> six did not meet the specific reuse plans outlined in the EPA’s fact sheets for the 2009 ARRA grants. These six sites are discussed in Appendix C.

## **Additional Internal Controls in the EPA’s Application Ranking System and Closeout Procedures May Improve the Future Effectiveness of Brownfield Cleanup Grants**

The EPA should improve its internal controls over the pre-award grant phase—which includes the Agency’s assessment and selection of applications for grant awards—to ensure that brownfield site cleanup grants will meet the statutory intent to clean up and reuse brownfield sites. Although the EPA reviews its grant application ranking system regularly, the system may not appropriately weigh applicants on their ability to complete brownfield site cleanups. Given that the EPA is limited by what it can request and track after a grant is closed, strengthening pre-award internal controls would help to ensure that cleanups meet the statutory intent.

The EPA’s existing pre-award procedures may not adequately ensure, to the extent practicable, that grant recipients have the capacity to complete their brownfield site cleanups. For example, the application ranking system for the 2009 ARRA cleanup grants allowed an applicant receiving a significantly lower score for one criterion compared to the other 37 recipients to still receive ARRA funds. This applicant, the Town of North Brookfield, received low marks for its ability to leverage non-EPA funds for the cleanup and subsequent reuse of its 14 South Common Street brownfield site. The maximum ranking score for all criteria was 100 points, with the “leveraging non-EPA funds” criterion worth five points. North Brookfield received an average score of 2.67 for that criterion. Two of the three application reviewers specifically noted that even with the ARRA funds, the town would need to leverage non-EPA funds to ensure the successful cleanup of the site. Moreover, one application reviewer noted that there was no indication that the applicant had a plan to address a \$200,000 funding gap. Despite these concerns and its low score for the leveraging non-EPA funds criterion, North Brookfield’s

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<sup>16</sup> This includes the 29 sites that have been cleaned up and reused, as well as the three sites that were not officially deemed fully cleaned up but that have been reused.

application scored high enough overall to be selected for a grant award. The application reviewers' concerns were borne out: North Brookfield did not fully clean up its brownfield site by the time the grant closed due to insufficient funding.

While our evaluation focused on the 38 ARRA cleanup grants that the EPA awarded in 2009, the EPA has awarded more than 1,600 brownfield cleanup grants since the Small Business Liability Relief and Brownfields Revitalization Act was enacted in 2002. Throughout all these competitions, the EPA was required to rank each application using 12 criteria,<sup>17</sup> although it could weigh those criteria differently each time. For example, in the EPA's fiscal year 2025 brownfield cleanup grant competition, which occurred nearly 25 years after the Act was signed, the maximum ranking score for all criteria was 180 points, with the leveraging non-EPA funds criterion worth ten points. Ultimately, since 2002, the EPA has awarded brownfield cleanup grants for more than 1,600 sites. If we extrapolate the results from the 2009 ARRA cleanup grant application ranking system, where one applicant, or 3 percent of the 38 total applicants, received a low score for the leveraging non-EPA funds criterion, to the entire set of 1,600-plus brownfield cleanup grants, it is likely that more than 48 applicants received a similar low score for that same criterion and were at an increased risk of being unable to fully clean up their sites by the time their grants closed.

The ability of a grant recipient to leverage additional funding from non-EPA sources for cleanup completion and subsequent reuse is important for the following reasons:

- According to a Brownfields Program manager, the cost to clean up a brownfield site usually exceeds the maximum amount that the EPA can fund by law. This remains true even after the Brownfields Utilization, Investment, and Local Development Act increased the maximum amount that the EPA can fund per site from \$200,000 to \$500,000, with the flexibility for up to \$650,000.
- According to a Brownfields Program manager, the EPA does not permit any recipients that previously received a cleanup grant for a specific site to reapply for additional EPA cleanup funds for the same site.
- The Small Business Liability Relief and Brownfields Revitalization Act is limited to providing Brownfields funding for assessment and cleanup activities and does not extend to the costs of project development.

Additionally, the EPA's ability to implement effective internal controls over the grant closeout phase and afterward is, at best, limited. While the EPA does have a grant closeout checklist that it completes to close out grants, this checklist could be improved by identifying the status of the cleanups and whether all required cleanup documentation has been submitted. Beyond that, as described in Chapter 1, the Agency generally cannot collect information after grant closeout on the status of site cleanup and

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<sup>17</sup> As noted in Chapter 1, in 2018, the Brownfields Utilization, Investment, and Local Development Act added two criteria to the Small Business Liability Relief and Brownfields Revitalization Act's original ten criteria. The leveraging non-EPA funds criterion was one of the original ten, however.

redevelopment. After a grant closes, the grant recipient is not required to update the EPA when a site is cleaned up or redeveloped. Furthermore, according to Brownfields Program personnel, the Agency does not have the resources to track brownfield sites after grant closeout. This limits the Agency's ability to track the Brownfields Program performance measures that address redevelopment status, as listed in Table 1, since those measures rely on data that may be available only after grant closeout. As a result, the EPA may not know the cleanup and redevelopment status of all brownfield sites being cleaned up under the Brownfields Program, which means that the Agency may not be able to fully assess the success of the program.

A lack of updated information on cleanup and redevelopment status hinders transparency as to the final outcome of projects using federal funds. As Table 2 previously illustrated, three of the 38 sites that we evaluated were not officially deemed cleaned up. Specifically, the grant recipients cleaning up the two Bristol sites and the Newark site did not submit the required documentation to the state voluntary cleanup response programs before the grants closed, and the state voluntary cleanup response programs were thus not able to assess whether the sites were cleaned up and ready for anticipated use. As of May 2025, these grant recipients still had not submitted this documentation to the state voluntary cleanup response programs, and those sites still had not been officially designated as cleaned up and ready for anticipated use. If grant recipients do not submit the needed documentation to the state or tribal voluntary cleanup response programs before their grants close, the EPA has no oversight capacity to facilitate the submissions. The onus then lies with the grant recipients and the state or tribal voluntary cleanup response programs. Specifically, the grant recipients remain responsible for obtaining no further action letters from the state or tribal voluntary cleanup response programs, and the state or tribal voluntary cleanup response programs can remind the grant recipients of any missing documentation. Without the proper documentation, the state or tribal voluntary cleanup response programs cannot ascertain whether sites are cleaned up appropriately for their intended reuse and that the required institutional controls have been implemented.

There are situations where cleanup documentation may not be immediately available at grant closeout for individual ARRA cleanup grants. For example, according to Office of Brownfields and Land Revitalization personnel, an EPA-funded cleanup may be part of a larger and ongoing cleanup effort, which means cleanup documentation would not be submitted until cleanup of the larger area is completed. Regardless, the Agency's inability to require ARRA cleanup grant recipients to provide updates on cleanup and redevelopment activities after grant closeout means that ACRES may not always reflect the latest status for brownfield sites. Ultimately, because the "Cleanups in My Community" mapping system uploads data directly from ACRES, this hampers the public's ability to access complete information on the status of nearby brownfield sites.

## **Conclusions and Suggestions**

As of February 2026, nearly 17 years after the EPA awarded the 2009 ARRA cleanup grants, more than three-quarters of the 38 brownfield sites that we evaluated had achieved the statutory intent of both cleanup and reuse. The remaining nine brownfield sites, or 24 percent, had not. Of these nine sites,

five were either not cleaned up or not officially deemed cleaned up, while four were cleaned up but not reused. The reasons for this condition stem, in part, from a need for the EPA to improve its internal controls in the pre-award and closeout phases of the grants. If the EPA selects grant recipients that application reviewers are concerned may be unable to leverage sufficient funds for cleanup and subsequent reuse, there is an increased risk that those brownfield cleanup grants may not achieve the full statutory intent of the Brownfields Program. Had the EPA known the sites would not be reused, it may have decided to award the funds to other applicants.

By fiscal year 2026, the Brownfields Program had awarded over 1,600 grants for site cleanups since the Small Business Liability Relief and Brownfields Revitalization Act was signed into law 24 years prior. In 2004, the Government Accountability Office estimated there were more than 450,000 brownfield sites across the United States. We understand that it is infeasible to request the Office of Brownfields and Land Revitalization to track the ultimate end outcomes for every grant, including those funded by ARRA. However, of the 38 sites we evaluated, we determined that three in particular could benefit from follow-up: the two Former H.J. Mills Property sites in Connecticut and the NSC Plating and Polishing Company site in New Jersey. We suggest that the Agency, where information gaps exist, ask that Connecticut and New Jersey obtain the necessary documentation from the grant recipients, assess whether the sites have been cleaned up and made ready for anticipated use, and provide the EPA with the results of their assessments. We also suggest that, in addition to standardizing the grant closeout checklist pursuant to Recommendation 2, the Agency add a checklist item for project officers to remind state or tribal voluntary cleanup response programs of sites that have not been cleaned up or made ready for anticipated use so that those entities can continue to monitor the cleanups.

## Recommendations

We recommend that the assistant administrator for Land and Emergency Management:

1. Review the application ranking system used by the EPA for brownfield site cleanup grants and determine whether it should be revisited, such as reweighting the criterion on leveraging non-EPA funds for cleanup and subsequent reuse. Revising the system, if warranted, would decrease the risk that a selected recipient may not be able to leverage sufficient funds to complete a brownfield site cleanup and facilitate subsequent reuse of the site.
2. Coordinate with EPA regional offices to add standardized questions to their cleanup grant closeout checklists that (a) request the status of each site at the time of grant closeout, including whether the site is being reused; (b) confirm the entry of all available data into the Assessment, Cleanup, and Redevelopment Exchange System; and (c) confirm the submission of all applicable documentation to the appropriate state or tribal oversight entity at the time of grant closeout. Doing so would minimize the risk that the oversight entity is unable to assess whether a brownfield site has met the risk-based cleanup standards for its anticipated use.

## Agency Response and OIG Assessment

The Agency's response to our draft report is in Appendix D. Throughout this evaluation, the OIG and the EPA have held differing interpretations of the statutory intent of the Brownfields Program. Our draft report noted that the statutory intent included reuse, as outlined in the preamble to the 2002 Small Business Liability Relief and Brownfields Revitalization Act. In feedback that the Agency provided prior to submitting its official response to our draft report, the Agency agreed that the ideal outcome for any brownfield site is full cleanup and "productive" reuse, but it stressed that program funding is intended to promote—which it defined as "encourage" or "help foster"—these outcomes by facilitating cleanup and stimulating a brownfield site's reuse. The Agency thus stated that while the statutory intent is to promote the cleanup of brownfields, it is not to ensure both cleanup and redevelopment of brownfields. We agree that the statute itself does not have language requiring the EPA to ensure the redevelopment of brownfield sites, but we maintain that the Agency has an oversight responsibility to ensure that grant recipients are meeting the terms and conditions of the grants, which include cleaning up their brownfield sites for the ultimate purpose of reuse.

Despite our disagreement regarding statutory intent, the Agency agreed with our recommendations. The Agency concurred with Recommendation 1 and plans to conduct an initial review of the application ranking system for cleanup grants by June 30, 2026, and annual reviews thereafter. It also plans to finalize the criteria and ranking system for the fiscal year 2027 cleanup grant competition by September 30, 2026. The Agency's proposed corrective actions and estimated completion dates meet the intent of the recommendation. Therefore, Recommendation 1 is resolved with corrective actions pending.

The Agency also concurred with Recommendation 2. The Agency plans to develop a grant closeout checklist template that incorporates the items listed in Recommendation 2 by December 31, 2026. It also plans to confirm that EPA regional offices have either initiated the use of the template or incorporated its contents into their existing closeout process for all relevant grants by March 31, 2027. The Agency's corrective actions and estimated completion dates meet the intent of the recommendation. Therefore, Recommendation 2 is resolved with corrective actions pending.

During its review of our draft report and before submitting the official response included in Appendix D, the Agency provided us with feedback. Based on this feedback, we removed some recommendations from our report and added suggestions to the "Conclusions and Suggestions" sections in Chapters 2 and 3.

# Chapter 3

## The EPA Does Not Track Complete Information on Cleanup and Redevelopment Measures

ACRES does not consistently contain complete information for Brownfields Program performance measures. Specifically, as of April 2025, ACRES did not have data about the dollars leveraged and jobs leveraged for 20, or 62.5 percent, of the 32 brownfield sites that we evaluated and that were reused, and it did not contain updated data on whether seven, or 22 percent, have been cleaned up, made ready for anticipated use, or both. The EPA also does not, outside of ACRES, track whether brownfield sites have been fully cleaned up and reused.

According to Office of Brownfields and Land Revitalization personnel, ACRES is meant to document EPA-funded, site-specific work during the grant performance period. However, this limits the effectiveness of the five performance measures for the Brownfields Program in sufficiently tracking program activities and outcomes from start to finish, as many related to redevelopment may occur after the grant performance period. According to an EPA training on ACRES,<sup>18</sup> the data in ACRES are used to determine the success of the Brownfields Program and can help stakeholders become aware of the economic impact of brownfields funding. The lack of complete redevelopment information in ACRES thus hampers the program's efforts to document, assess, and report its accomplishments. It also means that the public may not be accessing accurate information about brownfield sites in the EPA's Cleanups in My Community mapping system, which uploads data directly from ACRES.

### ACRES Does Not Contain Data for a Significant Percent of ARRA-Funded Site Cleanups

The EPA does not effectively track cleanup and redevelopment measures for the ARRA-funded site cleanups. In accordance with the Brownfields Program performance measures outlined previously in Chapter 1, the EPA tracks the number of cleanup and redevelopment jobs and the number of additional committed dollars leveraged by assessment or cleanup activities in ACRES. In other words, the EPA tracks how many jobs resulted from a site being cleaned up and reused, as well as how many non-EPA dollars were committed for cleanup and redevelopment. ACRES also has fields for other redevelopment activities for recipients to input, including redevelopment start and completion dates. The EPA does not, however, track the number of properties or acres that have been reused as a specific program measure.

Furthermore, although ACRES provides opportunities to track some redevelopment data, a grant recipient's reporting requirements end when the grant is closed, meaning that no one is mandated to enter this information after the grant's period of performance. In addition, the EPA's oversight for that grant ends upon grant closeout. As a result, the EPA does not routinely follow up to identify data gaps in

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<sup>18</sup> EPA, [Training on Entering Leveraged Dollars and Jobs in ACRES](#) (2025).

ACRES and to obtain complete information from former grant recipients. It is important to note that the EPA is not precluded from tracking EPA-funded cleanup sites after grant closeout. According to Brownfields Program personnel, however, the Agency lacks the resources to track such information after grants close.

As of April 2025, ACRES had incomplete performance measure information about 20, or nearly 63 percent, of the 32 ARRA-funded brownfield site cleanups that resulted in redevelopment. Specifically, ACRES did not have complete information about the jobs leveraged during redevelopment and the dollars leveraged. ACRES also had unreported data regarding two other performance measures for seven, or 22 percent, of the 32 sites: whether they were cleaned up, whether they were made ready for anticipated use, or both. Additionally, ACRES did not include cleanup or made-ready-for-anticipated-use data about another site that we evaluated that had been cleaned up but not reused: the former gas station at 1037 Bergen Street in Newark, New Jersey.

Four of the brownfield sites that were cleaned up using ARRA cleanup grants are highlighted on the EPA's "Success Stories" [web page](#). However, ACRES lacked information about whether three of these four sites were made ready for anticipated use, about their redevelopment, or both. Having incomplete data in ACRES is not unique to brownfield sites cleaned up using ARRA dollars. According to the Office of Land and Emergency Management, of the more than 43,000 brownfield sites reported in ACRES, only about 9 percent had information about jobs leveraged and only about 18 percent had information about dollars leveraged.

Although the legal reporting and oversight requirements of a grant and the EPA end when a grant is closed, entering information in ACRES through project completion would allow the EPA to track whether recipients of all brownfield cleanup grants, including those funded by ARRA, have fully cleaned up and reused the sites. Maintaining complete redevelopment data in ACRES would allow the Agency to effectively track the outcomes of cleanup grants. Obtaining missing ACRES data is possible. To determine the status of sites that received ARRA cleanup funds but that had incomplete ACRES information, we reached out to the regional offices, state voluntary cleanup response programs, or the recipients of the grants. Appendix B documents the results of our outreach.



Broad Avenue Property, Central City, Pennsylvania.  
(EPA OIG image)

Regional Brownfields Program staff stated that their focus is on three performance measures: properties assessed, properties cleaned up, and properties made ready for anticipated use. They do not focus on site redevelopment information. Additionally, EPA personnel across the regions consistently discussed the difficulties of tracking redevelopment information in ACRES. They attributed these difficulties to grant recipients being responsible for entering information into ACRES and to redevelopment typically occurring after the cleanup grants are closed, which ends the requirement for data entry into ACRES. However, when cleanup and redevelopment activities are not tracked for EPA-funded brownfield site cleanups, the EPA cannot accurately inform the public whether Brownfields Program performance measures have been achieved.

## Conclusions and Suggestions

Even if the legal reporting and oversight requirements of a grant recipient and the EPA end when a grant is closed, a best practice would be for the EPA to collect information through project completion, not grant completion, whenever practicable. This would allow the EPA to comprehensively report on the five brownfields performance measures rather than relying on the measures completed before the grants close. More robust data collection would support the statutory intent of the Brownfields Program.

Because of the practical limitations on information collection after grant completion, we are not recommending that the Agency do so. Instead, we suggest that the EPA determine whether it could feasibly implement a process to regularly review a varying subset of closed brownfield cleanup grants; determine whether those sites have been cleaned up, made ready for anticipated use, and reused; and enter any missing information into ACRES. Implementing such a process would enable the EPA to more completely ascertain the success of the Brownfields Program. In addition, by more completely tracking the cleanup and redevelopment status of brownfield sites and by ensuring that ACRES information for each subset of sites reviewed is complete and up to date, the EPA will be able to more accurately inform the public whether sites near them have been cleaned up and reused.

## Status of Recommendations

Rec. No.	Page No.	Recommendation	Status*	Action Official	Planned Completion Date
1	17	Review the application ranking system used by the EPA for brownfield site cleanup grants and determine whether it should be revisited, such as reweighting the criterion on leveraging non-EPA funds for cleanup and subsequent reuse. Revising the system, if warranted, would decrease the risk that a selected recipient may not be able to leverage sufficient funds to complete a brownfield site cleanup and facilitate subsequent reuse of the site.	R	Assistant Administrator for Land and Emergency Management	9/30/26
2	17	Coordinate with EPA regional offices to add standardized questions to their cleanup grant closeout checklists that (a) request the status of each site at the time of grant closeout, including whether the site is being reused; (b) confirm the entry of all available data into the Assessment, Cleanup, and Redevelopment Exchange System; and (c) confirm the submission of all applicable documentation to the appropriate state or tribal oversight entity at the time of grant closeout. Doing so would minimize the risk that the oversight entity is unable to assess whether a brownfield site has met the risk-based cleanup standards for its anticipated use.	R	Assistant Administrator for Land and Emergency Management	3/31/27

\* C = Corrective action completed.

R = Recommendation resolved with corrective action pending.

U = Recommendation unresolved with resolution efforts in progress.

## ***Chronological List of the Agency’s Guidance, Actions, and Documentation Supporting the Statutory Intent of Cleanup and Reuse of Contaminated Sites***

Year	Source	Support
2008	<i>EPA’s Brownfields and Land Revitalization Programs: Changing American Land and Lives</i> <a href="#">EPA-560-F-08-241</a>	This brochure states that one of the four goals of the Brownfields Program is “Sustaining Reuse,” which includes “[r]edeveloping brownfields to enhance a community’s long-term quality of life.”
2008	<i>FY09 Proposal Guidelines for Brownfields Assessment Grants</i> <a href="#">EPA-560-F-08-249</a>	These guidelines state that the EPA’s evaluation of brownfields grant proposals will include these two factors: “a vision for the reuse and redevelopment of brownfield sites and the capability to achieve that vision” and the “economic, environmental, health, and social benefits associated with the reuse and redevelopment of brownfield sites.” Also, the grant ranking process outlined in these guidelines provides up to five points to applicants demonstrating that they meet the “Environmental Benefits from Infrastructure Reuse/Sustainable Reuse” criterion. For this criterion, applicants are asked to “[d]escribe any anticipated environmental benefits, beyond the remediation of contaminants, associated with the sustainable redevelopment of the site cleaned up under this grant, including the use of existing infrastructure, such as utilities and public transit.”
2008	<i>FY09 Proposal Guidelines for Brownfields Cleanup Grants</i> EPA-560-F-08-251	These guidelines state that grant proposals “will be evaluated, among other factors, on the extent to which the applicant demonstrates ... a vision for the reuse and redevelopment of brownfield sites and the capability to achieve that vision; ... partnerships and leveraged resources necessary to complete the project; and economic, health, and social benefits associated with the reuse and redevelopment of brownfield sites.” In addition, the guidelines provide that the “[e]xpected outcomes of brownfields grants include the number of jobs leveraged and other funding leveraged through the economic reuse of sites; the number of acres made ready for reuse or acres of greenspace created for communities; and whether the project will minimize exposure to hazardous substances.”
2013	<i>EPA’s Brownfields and Land Revitalization Program: Previously Used Properties with New Purpose</i> <a href="#">EPA-560-F-13-049</a>	This brochure states, “As part of our mission to protect human health and the environment, the EPA is dedicated to revitalizing all types of contaminated land and returning properties to productive reuses.” It also provides that the “EPA’s land revitalization efforts focus on ... sustainable redevelopment approaches and greener cleanups.”

Year	Source	Support
2020	<i>Environmental Benefits of Brownfields Redevelopment—A Nationwide Assessment</i> <a href="#">EPA 560-R-20-001</a>	This entire assessment, including its title, indicates the EPA's commitment to redevelopment.
2022	<a href="#">FY 2022–2026 EPA Strategic Plan</a> Note: The EPA is no longer using this strategic plan and is developing its <a href="#">FY 2026–2030</a> strategic plan.	This plan states that the “EPA will help build vibrant communities by supporting Tribes, states, local governments, and nonprofit organizations as they assess, cleanup and plan reuse of brownfields properties.”
2021	<i>Revitalization-Ready: A Guide To Revitalizing Land In Your Community</i> <a href="#">EPA-560-F-21-193</a>	This assessment indicates the EPA's commitment to redevelopment by revitalizing land.
2025	<i>FY25 Guidelines for Brownfield Cleanup Grants</i> <a href="#">EPA-I-OLEM-OBLR-24-11</a>	These guidelines for brownfield cleanup grants funded by the Infrastructure Investment and Jobs Act state that “applications will be evaluated based on the extent to which the applicant demonstrates: a vision for the cleanup, reuse, and redevelopment of brownfield sites and a strategy for leveraging resources to help accomplish the vision.” In addition, the guidelines provide that the “[e]xpected outcomes of Brownfield Grants include the number of jobs created and funding leveraged through the economic reuse of sites; the number of acres made ready for reuse; acres of greenspace created for communities; and the minimized exposure to hazardous substances and petroleum contamination.”
2025	EPA <a href="#">web page</a> , “Basic Information about Land Revitalization” (last visited March 12, 2026)	According to this web page, the “Brownfields Program is designed to empower communities to work together to clean up and sustainably reuse Brownfields areas.”
2025	EPA <a href="#">web page</a> , “Land Revitalization” (last visited March 12, 2026)	The content of this web page indicates the EPA's commitment to redevelopment through land revitalization.
2025	EPA <a href="#">web page</a> , “About Brownfields” (last visited March 12, 2026)	In the “Brownfields Now” section, this web page states that the “EPA's Brownfields Program has continued to empower states and communities to work together to prevent, assess, safely clean up and sustainably reuse contaminated properties.” Of the six key ways that the Agency accomplishes those goals, the web page states that one is the EPA's commitment “to helping communities revitalize brownfield properties.”
2025	EPA <a href="#">press release</a> , <i>EPA Announces \$267 Million in Brownfields Grants to Cleanup Communities Across the Country</i> (last visited March 12, 2026)	According to this press release, “[t]he \$267 million in Brownfield Grants will transform contaminated properties into valuable spaces for businesses and housing, creating new opportunities that strengthen local economies and directly benefit American families.”

Year	Source	Support
2025	<i>Brownfields Program Measure Definitions</i>	<p>This document provides official definitions for measures used to gauge achievements under the Brownfields Program, including:</p> <ul style="list-style-type: none"> <li>• <i>Jobs Leveraged</i>,* which is the “[n]umber of cleanup and redevelopment jobs leveraged by assessment or cleanup activities conducted with EPA Brownfields funding, as reported by cooperative agreement recipients at a specific property. These are numbers reported by recipients that are based on actual (not estimated) jobs resulting from environmental work at the site or the redevelopment of the site.”</li> <li>• <i>Dollars Leveraged</i>,* which is the “[n]umber of additional committed dollars leveraged [including for cleanup and redevelopment] by assessment or cleanup activities conducted with EPA Brownfields funding, as reported by cooperative agreement recipients at a specific property.”</li> </ul>

Source: OIG analysis of the Small Business Liability Relief and Brownfields Revitalization Act and EPA guidance, planning, performance measurement documents, and information products. (EPA OIG table)

\* According to the *Brownfields Program Measure Definitions*, “the term ‘leveraged’ refers to those non-EPA Brownfields funds and activities that have some link or nexus to the efforts of an EPA cooperative agreement-funded activity. Leveraged activities and accomplishments are results/outcomes where the EPA-funded activity was a catalyst for the leveraged activity or accomplishment.”










## Status of 2009 ARRA-Funded Brownfield Site Cleanups, as of May 2025

To enable easy identification of incomplete data in ACRES, we marked those cells with the following symbol in black: ⊖. In the “Met reuse plan?” column, a missing data symbol indicates that the site has incomplete information in ACRES about the dollars and jobs leveraged as a result of the redevelopment. To enable easy identification of the sites that did not meet the specified performance measures, we marked those cells with the following symbol in red: ✘. Please see the table headers and notes for more details about the data in this table.

EPA region	State	Site name and address	ARRA grant recipient*	Cleaned up?	Ready for anticipated use? (no. of acres)	Reuse plan†	Current site use	Met reuse plan?	Met Brownfields Program intent?
1	CT	Former H.J. Mills Property, Assessor’s Map 30 Lot 49-50 149-151 Church St., Bristol	City of Bristol	N ✘	N ✘	Community parking lot	Public parking lot	Y	N ✘
1	CT	Former H.J. Mills Property, Assessor’s Map 30 Lots 61-1A and 61-2, 149-151 Church St., Bristol	City of Bristol	N ✘	N ✘	Community parking lot	Public parking lot	Y	N ✘
1	MA	Former Mountain Road Firing Range Parcel 199-00-013, which is near 270 Mountain Road, Holyoke‡	City of Holyoke	Y	Y§ (10) ⊖	15 acres for green space that could be linked to a major national scenic trail and four acres for housing	15 acres used as green space linked to a major national scenic trail; for the remaining four acres, the city has not redeveloped them into housing but remains committed to doing so	N§ ✘ ⊖	Y
1	MA	14 South Common St. Site 14 South Common St., North Brookfield	Town of North Brookfield	N    ✘	N ✘	Municipal and commercial uses	Vacant lot; the site is not cleaned up	N ✘	N ✘

EPA region	State	Site name and address	ARRA grant recipient*	Cleaned up?	Ready for anticipated use? (no. of acres)	Reuse plan†	Current site use	Met reuse plan?	Met Brownfields Program intent?
1	ME	Old Howland Tannery-Lot 37 10 Bridge Rd., Howland	Town of Howland	Y	Y (7.57)	River-related recreation and associated businesses	The town split the lot into two lots. The town redeveloped one lot to house the town office, fire department, and emergency medical services. The town sold the other lot to a private citizen who has not redeveloped the lot.#	N ✗	Y
1	ME	Old Howland Tannery-Lot 76 near 10 Bridge Rd., Howland	Town of Howland	Y	Y (2.39)	River-related recreation and associated businesses	Public park	Y	Y
1	ME	Old Howland Tannery-Lot 77** near 10 Bridge Rd., Howland	Town of Howland	Y	Y (1.14)	River-related recreation and associated businesses	Public park	Y	Y
1	ME	Sanford Mill 61 Washington St., Sanford	Town of Sanford	Y	N ✗	36 housing units	43 residential units and three commercial spaces	Y	Y
1	RI	Former Lafayette Worsted Company Office 148 Hamlet Ave., Woonsocket	City of Woonsocket	Y	Y (1.55)	New middle school campus	Middle school campus	Y	Y
2	NJ	NSC Plating and Polishing Company 242-248 South 12th St., Newark	City of Newark	N ✗	N ✗	Affordable housing and ground-floor retail space	City of Newark Department of Public Works	N <sup>§</sup> ✗ ⊖	N ✗
2	NJ	International Metallurgical Services 190-202 Blanchard St., Newark	City of Newark	Y <sup>§</sup> ⊖	Y <sup>§</sup> (1.62) ⊖	Light industrial or manufacturing	Light industrial and other commercial space	Y <sup>§</sup> ⊖	Y

EPA region	State	Site name and address	ARRA grant recipient*	Cleaned up?	Ready for anticipated use? (no. of acres)	Reuse plan†	Current site use	Met reuse plan?	Met Brownfields Program intent?
2	NJ	Former gas station 1037 Bergen St., Newark	City of Newark	Y <sup>s</sup> ⊖	Y <sup>s</sup> (0.31) ⊖	Commercial uses	Vacant lot	N ✗	N ✗
2	NJ	Lee Place Site 208-222 Lee Place, Plainfield	City of Plainfield	N ✗	N ✗	Affordable housing	Vacant lot; site is not cleaned up	N ✗	N ✗
2	NJ	75 Woodward St. Site 75 Woodward St., Jersey City	Jersey City Redevelopment Agency	Y	Y <sup>s</sup> (1.66) ⊖	Public park	Public park	Y	Y
2	NJ	Garfield Junkyard Site 958-960, 964, and 966 Garfield Ave., Jersey City	Jersey City Redevelopment Agency	Y	Y <sup>s</sup> (0.4) ⊖	Public park	Public park	Y <sup>s</sup> ⊖	Y
2	NJ	JR Transportation Site 1000 Garfield Ave., Jersey City	Jersey City Redevelopment Agency	Y	Y <sup>s</sup> (1.07) ⊖	Public park	Public park	Y <sup>s</sup> ⊖	Y
3	PA	Broad Ave. Property Broad Ave., Central City	Borough of Central City	Y	Y (0.45)	At least 12 housing lots	Vacant parcels	N ✗	N ✗
3	PA	Former Sayre Railyards Site North Thomas Ave., Sayre	Central Bradford Progress Authority	Y	Y (25.04)	Industrial reuse	Railway company	Y	Y
3	PA	Old PECO Building 140 College Dr., Pottstown	Montgomery County Community College	Y	Y (3)	Montgomery County Community College's environmental science program and interpretative visitors' center for the nearby Schuylkill River National and State Heritage Area	The building houses the college's "Challenger Learning Center, which immerses students in space-themed simulated learning environments" and the River of Revolutions Interpretive Center	Y <sup>s</sup> ⊖	Y

EPA region	State	Site name and address	ARRA grant recipient*	Cleaned up?	Ready for anticipated use? (no. of acres)	Reuse plan†	Current site use	Met reuse plan?	Met Brownfields Program intent?
3	WV	Fostoria Glass Plant 1200 First St., Moundsville	City of Moundsville	Y <sup>††</sup>	Y <sup>††</sup> (7.28)	Plaza for the arts, education, and culture	Vacant lot	N 	N 
4	KY	Former Empire Pencil Factory 550 Bourbon St., Georgetown	City of Georgetown	Y	Y (2)	State-of-the-art law enforcement campus	Police station	Y <sup>§</sup> 	Y
5	MN	Bruce Vento Interpretive Center Phase I Site 293 Commercial St. and two adjacent nonaddressed areas, Saint Paul	City of Saint Paul	Y	Y <sup>§</sup> (1.85) 	Interpretive center	Nature and cultural interpretive center; construction to be completed in spring of 2025 with grand opening in October 2025	Y <sup>§</sup> 	Y
5	MN	Minnehaha Lanes Site 955 West Seminary Ave., Saint Paul	Saint Paul Port Authority	Y	Y (4.41)	Light industrial and high-tech manufacturing and office space	Commercial space	Y	Y
5	OH	Pete's Sunoco Site 496 4th St. NW, Barberton	City of Barberton	Y	Y (0.2)	City park and learning lab	Vacant green space lot	N <sup>§</sup>  	Y
5	OH	Former Sandusky Cabinets Site 513 East Washington St. and 430 East Market St., Sandusky	City of Sandusky	Y	Y (2.6)	According to the cleanup grant fact sheet, the cleanup would "help the city move forward with redevelopment of the property"	Housing units	Y <sup>§</sup> 	Y
6	OK	Vintage Lakes Property 10301 North Pennsylvania Ave., The Village	The Village Public Works Authority	Y	Y (17)	Housing, retail-office space, and parks	Housing units, commercial space, and park	Y	Y
6	TX	Throckmorton Service Station 101 West Chestnut St., Throckmorton	Throckmorton County	Y	Y (0.06)	Green space with a monument on it	Green space with a sculpture of cattle on it	Y <sup>§</sup> 	Y

EPA region	State	Site name and address	ARRA grant recipient*	Cleaned up?	Ready for anticipated use? (no. of acres)	Reuse plan†	Current site use	Met reuse plan?	Met Brownfields Program intent?
7	IA	South Main Street Redevelopment Site 129-141 South Main St., Maquoketa	City of Maquoketa	Y	Y (0.48)	National chain retail operation and green space through streetscape	Green space and event space; construction of a permanent stage and restroom facility with amenities began in April 2005	N <sup>s</sup> ✗ ⊖	Y
7	MO	East Village Project, Former Greyhound Bus Terminal 700 East 12 <sup>th</sup> St., Kansas City	City of Kansas City	Y	Y (2.2)	Townhouses, retail and commercial space, or a hotel	Vacant green space lot	N <sup>s</sup> ✗ ⊖	Y
7	MO	Jordan Valley West Meadows Site 4 309 North Main Ave., Springfield	City of Springfield	Y	N (2.69) ✗	To be part of the 300-acre Jordan Valley Park, with recreational activities and open space, along with economic development activities	Public trail	Y <sup>s</sup> ⊖	Y
8	CO	Paxson Building Site 202 Church St., Kit Carson	A Colorado rural development nonprofit organization	Y	Y (0.45)	According to the cleanup grant fact sheet, the cleanup was “expected to serve as a catalyst that will enable the town to redevelop this and other sites in town”	Commercial space and charging station	Y <sup>s</sup> ⊖	Y
8	SD	Tekakwitha Old Orphanage and Boarding School Complex 11950 Bureau of Indian Affairs Highway 700, Sisseton	Sisseton-Wahpeton Oyate	Y	Y (13.54)	Ballparks, recreational areas, and open space	Public park	Y <sup>s</sup> ⊖	Y

EPA region	State	Site name and address	ARRA grant recipient*	Cleaned up?	Ready for anticipated use? (no. of acres)	Reuse plan†	Current site use	Met reuse plan?	Met Brownfields Program intent?
9	AZ	Route 66 Creosote Pit Cleanup and Redevelopment Project 116 West Phoenix Ave., Flagstaff	City of Flagstaff	Y	Y (3.37)	Multimodal transportation hub, retail and commercial space, open-air market, green space, and Route 66 history museum	Bus transfer station and parking lot; construction of a transit hub and civic center ongoing	N <sup>§</sup> ✗ ⊖	Y
9	CA	Trinidad Pier and Harbor One Bay St., Trinidad	Cher-Ae Heights Indian Community of the Trinidad Rancheria	Y	Y (0.33)	New pier	Relatively new pier	Y <sup>§</sup> ⊖	Y
9	CA	Experience Motel 824 West Capitol Ave., West Sacramento	City of West Sacramento	Y	Y (1.11)	Unknown; the grant fact sheet for the recipient did not include the reuse plan	Vacant	N ✗	N ✗
9	CA	Lion Creek Crossings Phase 4 6951 Lion Way, Oakland	Oakland Housing Authority	Y	Y (1.55)	72 units of affordable rental housing	72 affordable housing units	Y	Y
9	CA	Trumble Road and Highway 74 Site 25351 Trumble Rd., Perris	Riverside County Redevelopment Agency	Y	Y (5)	Retail, restaurant, or hotel space	Construction of strip mall and gas station ongoing	Y <sup>§</sup> ⊖	Y
10	WA	Rainier Court Phase III 3605 34th Ave. South, Seattle	A Seattle development nonprofit organization	Y	Y <sup>§</sup> (0.75) ⊖	86 new affordable housing units for low- and moderate-income seniors, green space, and open space	Housing units for low- to moderate-income seniors, inner courtyard, parking spaces, and landscaping with drought-tolerant plants	Y <sup>§</sup> ⊖	Y

Source: OIG summary of the ARRA cleanup grant fact sheets, property profiles in ACRES, other EPA information, publicly available satellite images and street views, information from state and tribal voluntary cleanup response programs, and other publicly available information. (EPA OIG table)

\* The grant award amount for each recipient was \$200,000, except for the City of Bristol's Former H.J. Mills Property, Assessor's Map 30 Lots 61-1A and 61-2; Throckmorton County's defunct Service Station; and City of Flagstaff's Route 66 Creosote Pit Cleanup and Redevelopment Project. These sites received \$145,033; \$32,200; and \$126,900, respectively.

† We obtained the reuse plans from the grant fact sheets, which noted that the plans were subject to change.

‡ The Former Mountain Road Firing Range site consists of Pits 1, 2, and 3. Pit 1 comprises nine acres, while Pits 2 and 3 comprise ten acres, for a total of 19 acres. The City of Holyoke received an ARRA grant to clean up Pits 2 and 3 and another Brownfields Program grant to clean up Pit 1. According to ACRES, cleanup of all three pits was completed on September 26, 2013.

§ ACRES did not contain updated information regarding whether the site was ready for anticipated use. We had to reach out to the regions, state or tribal voluntary cleanup response programs, or grant recipients to obtain this information.

|| ACRES, and subsequently the “Cleanups in My Community” mapping system, list the 14 South Common Street site as cleaned up, which is misleading. While a portion of the site was cleaned up, the entire site has not been fully cleaned up.

# According to the town manager, the private citizen had agreed to redevelop the lot into a grocery store in the lot sales transaction. Since the redevelopment has not come to fruition, the town is in the process of repossessing the lot for breach of contract.

\*\* The town erroneously submitted the grant application for Lot 75. According to publicly available satellite images, Lot 75 has been a playground since at least 1997. The town manager confirmed that the correct lot is Lot 77, which was occupied by the Old Tannery like Lots 37 and 76 were.

†† The ARRA-funded cleanup profile for the Fostoria Glass Plant is not in ACRES. We relied on the ACRES site profile for the Fostoria Glass Plant in association with EPA Cooperative Agreement BF95349201, which was awarded to the Belomar Regional Council in 2024 to assess the site.

## ***Six Reused Sites That Did Not Meet the Reuse Plans Specified in the EPA Fact Sheets***

**Old Howland Tannery-Lot 37 in Howland, Maine.** According to the reuse plan, the site was to be redeveloped to have river-related recreation and associated businesses. The town split the cleaned up site into two lots. It redeveloped one lot to house the town office, fire department, and emergency medical services. The town sold the other lot to a private citizen, who has not redeveloped the lot. According to the town manager, the private citizen agreed to redevelop the lot into a grocery store. Since this redevelopment has not come to fruition, the town is in the process of repossessing the lot for breach of contract.

**NSC Plating and Polishing Company in Newark, New Jersey.** The reuse plan specified that the site would be redeveloped as affordable housing with ground-floor retail space. The site is, however, occupied by a City of Newark Department of Public Works service center for dropping off trash, bulk waste, and recycling.



Once the remediation is complete, the City [Barberton, Ohio] will redevelop the parcel into a new park and learning lab for recreational, education and eco-agricultural uses via collaboration with the Barberton Board of Education.

ARRA-Funded Grant 2B00E95101 (2009)



**Pete's Sunoco Site in Barberton, Ohio.** According to the reuse plan, the site was to be redeveloped into a public park and learning lab. The site is now a vacant green space lot. According to a Barberton city official, the learning lab was incorporated into the new middle school that was being built across the street while the brownfield site was being cleaned up. The city said that it has no intention

of transforming the site into a public park. We note that, according to a historical street view and satellite images of the brownfield site before it was cleaned up, the site appeared very similar to its current state: It was already a green space lot with overgrown vegetation, was not fenced up, and was across the street from a school.

**East Village Project, Former Greyhound Bus Terminal, in Kansas City, Missouri.** The reuse plan said that either townhouses, retail and commercial space, or a hotel would be constructed on the site. The site is now a vacant green space, but it is not a public park. According to a Region 7 Brownfields Program manager, the site is under consideration to become part of a new professional ballpark.

**South Main Street Redevelopment Site in Maquoketa, Iowa.** The reuse plan specified that a national chain retail operation and green space would be developed on the site. While the cleaned-up site has

green space, it has been used as an open-air event space and does not contain any retail operation. Construction of a permanent stage and a restroom facility with amenities began in April 2025.

**Route 66 Creosote Pit Cleanup and Redevelopment Project in Flagstaff, Arizona.** According to the reuse plan, this site would be redeveloped to contain a multimodal transportation hub, retail and commercial space, open-air market, green space, and Route 66 history museum. The cleaned-up site is currently a bus transfer station and parking lot. Construction of a transit hub and civic center is ongoing, however.



waste, based on a misinterpretation of its intended function. Consequently, OLEM and OBLR leadership met with your office to discuss these issues and request revisions.

As a result, the OIG removed four of the six initial recommendations. OLEM and OBLR appreciate the OIG's engagement and willingness to revise the recommendations to support effective, practical change. At this review stage, OLEM has only seen the revised recommendations and submits this response with the understanding that the final report will reflect the concerns raised. OLEM will submit technical comments during the 60-day review period.

**AGENCY'S RESPONSE TO REPORT RECOMMENDATIONS**

<b>No.</b>	<b>Recommendation</b>	<b>High-Level Intended Corrective Action(s)</b>	<b>Estimated Completion Date</b>
1	Review the application ranking system used by the EPA for brownfield site cleanup grants and determine whether it should be revisited, such as re-weighting the criterion on leveraging non-EPA funds for cleanup and subsequent reuse.	1.1 Annual review of national competition ranking criteria and scoring for cleanup cooperative agreements (part of the national review of ranking criteria for all cooperative agreement types offered under the Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Cooperative Agreement assistance listing 66.818).	06/30/2026
		1.2 Finalize FY2027 ranking criteria and scoring for Cleanup Grant applications.	09/30/2026
		1.3 Publish FY2027 Notice of Funding Opportunity (NOFO) for national grant competitions, including Cleanup Grants.	09/30/2026
2	Coordinate with EPA regional offices to add standardized questions to their cleanup grant closeout checklists that (a) request the status of each site at the	2.1 Create a Brownfields Grant Closeout Checklist template that incorporates items (a), (b), and (c) for all Multipurpose, Assessment, Revolving Loan Fund, and Cleanup (MARC) Grants.	12/31/2026

	<p>time of grant closeout, including whether the site is being reused; (b) confirm the entry of all available data into the Assessment, Cleanup, and Redevelopment Exchange System; and (c) confirm the submission of all applicable documentation to the appropriate state or tribal oversight entity at the time of grant closeout.</p>	<p>2.2 Confirm that regional EPA offices have either initiated the use of the template as provided or incorporated its contents into their existing closeout process for all MARC Grants.</p>	<p>03/31/2027</p>
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CONTACT INFORMATION

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