EPA New England FY2019 Brownfields Grant Guidelines Workshop

CLEANUP GRANT SESSION





Purpose of this Session

- Provide an overview of the FY2019 Brownfields Cleanup Grant Guidelines.
- Review the Cleanup Grant proposal submission process, threshold criteria & ranking criteria.
- Provide an opportunity for Q&A.
- Should any information provided in the following slides or by the presenters differ from the Guidelines, the language written in the Guidelines shall prevail.

EPA Region 1 Brownfields

Section I.A Description of Grant

Provides funds to carry out Brownfield cleanup activities at a specific site or multiple sites owned by the applicant.

- An individual applicant can apply for:
 - One cleanup proposal up to \$500,000.
 - Address a single site or multiple sites.
- Period of performance is 3 years.





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Section I.A Description of Grant

- Administrative costs (direct costs and indirect costs) are allowed up to 5% of the requested funds. See FY19 FAQs N.1-12.
- Property Ownership
 - The applicant must be the sole owner of the subject property(ies) by January 31, 2019, the proposal due date.
 - For purposes of eligibility determinations in these guidelines only, the term "own" means fee simple title through a legal document, such as a recorded deed.



Section I.A Description of Grant

- Hazardous Substances & Petroleum
 - If you are cleaning up hazardous substances and petroleum at the **same site**, you must respond to the eligibility criteria for both types of funding.
 - Sites where petroleum contamination is co-mingled with hazardous substances are considered hazardous substances sites.
 - Call or email Jim Byrne at (617) 918-1389 or <u>byrne.james@epa.gov</u> if you need advice regarding whether your site is considered petroleum or co-mingled.

Section I.A Description of Grant

EPA Region 1 Brownfields

Cost Share

- Applicants must provide a 20% cost share. A \$200,000 proposal will require a \$40,000 cost share and a \$500,000 proposal will require a \$100,000 cost share.
- The cost share may be in the form of a contribution of money, labor, material or services and must be for eligible and allowable cleanup costs and cannot include administrative costs.
- Applicants with populations of 50,000 or fewer may request a waiver of the cost share requirement. EPA will consider hardship waiver requests on a case-by-case basis.
- Instructions for applying for a waiver are on pages 25-26 of the guidelines. This is an allowable attachment.
- See FY19 FAQs M.1-4.

- 1. Grant funds can be used for direct programmatic costs such as performance reporting and environmental oversight consistent with the requirements at 2 CFR Part 200, Subpart E.
- 2. Local governments may use up to 10% of their grant funds for (see <u>Health Monitoring</u> fact sheet & FY19 <u>FAQs</u> R.1):
 - a. Health monitoring of populations exposed to hazardous substances, pollutants, or contaminants from a brownfield site; and
 - b. Monitoring and enforcement of any institutional control used to prevent human exposure to any hazardous substance, pollutant, or contaminant from a brownfield site.
- 3. Grant funds may be used to purchase environmental insurance. (See FY19 FAQs F.5-6.)

Section III.A Who Can Apply

- General Purpose Unit of Local Government
- Land Clearance Authority or a quasi-governmental entity
- Government Entity Created by State Legislature
- Regional Council or group of General Purpose Units of Local Government
- Redevelopment Agency that is chartered or otherwise sanctioned by a state
- State
- Indian tribe other than in Alaska

Section III.A Who Can Apply

- Nonprofit organization described in section 501(c)(3) of the Internal Revenue Code.
- Limited liability corporation in which all managing members are 501(c)(3) nonprofit organizations or whose sole members are 501(c)(3) nonprofit organizations.
- Limited liability partnership in which all general partners are 501(c)(3) nonprofit organizations or whose sole members are 501(c)(3) nonprofit organizations.
- Qualified community development entity as defined in section 45D(c)(1) of the Internal Revenue Code of 1986.

Section III.A Who Can Apply

EPA Region 1 Brownfields

▶ Other nonprofit organizations. (For the purposes of the Brownfields Grant Program, the term "other nonprofit organization" means any corporation, trust, association, cooperative, or other organization that is operated mainly for scientific, educational, service, charitable, or similar purpose in the public interest and is not organized primarily for profit; and uses net proceeds to maintain, improve, or expand the operation of the organization. The term includes nonprofit colleges, universities, and other educational institutions.)

Section III.B Threshold Criteria

EPA Region 1 Brownfields

- Threshold Criteria are on pages 12-26 of the Cleanup Guidelines. These criteria are pass/fail.
- The Cleanup Grant Guidelines have multiple Threshold Criteria. Make sure you respond to all criteria or you may be eliminated from the competition. Be careful here.
- While EPA may seek clarification of a response, if you did not respond, it's impossible to seek clarification.
- Reponses must be included as an attachment to your Narrative Proposal.



You must pass these criteria to move forward in the competition!

EPA Region 1 Brownfields

- Applicant Eligibility
- Previously Awarded Cleanup Grants
- 3. Site Ownership
- Basic Site Information
- Status & History of Contamination at the Site
- Brownfields Site Definition
- Environmental Assessment Required for Cleanup Grant Proposals
- **Enforcement or Other Actions**
- Sites Requiring a Property-Specific Determination
- 10. Threshold Criteria Related to CERCLA/Petroleum Liability
- 11. Cleanup Authority and Oversight Structure
- 12. Community Notification
- 13. Statutory Cost Share

If you have multiple sites, you must include this information for each site.

Threshold Criteria 1. Applicant Eligibility

- Provide information that demonstrates how you are an eligible entity as specified in Section III.A.
 - If you are a Municipality, State or Tribe, affirm that you are an eligible entity.
 - If you are Other Than a municipality, state or tribe, attach eligibility documentation such as resolutions, statutes, articles of incorporation, etc.
 - If you are a section 501(c)(3) Non-Profit organization or organizations comprised of nonprofit organizations, attach documentation demonstrating tax-exempt status under section 501(c)(3) of the Internal Revenue Code.

1. Applicant Eligibility

Threshold Criteria

- If you are a nonprofit organization not exempt from taxation under section 501(c)(3) of the Internal Revenue Code, you need to submit other forms of documentation of nonprofit status such as certificates of incorporation as a nonprofit under state or tribal law.
- If you are a Community Development entity, attach documentation certifying your organization's eligibility.
- If you are an other nonprofit organization, attach
 documentation that demonstrates you are an eligible entity
 such as certificates of incorporation under state or tribal law.
- See FY19 FAQs E.1-4.

2. Previously Awarded Cleanup Grants

- Applicants that were previously awarded a Brownfields Cleanup Grant for a site may not request an additional Cleanup Grant for the same site(s). See FY19 FAQs K.3.
- Affirm, in this criterion, that you have not received a previous Cleanup Grant for this site(s).



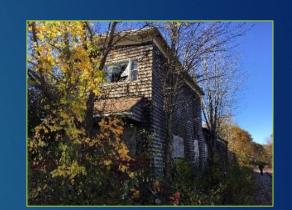
Threshold Criteria 3. Site Ownership



- You must be the sole owner of the property by the time you submit your proposal. The term "own" means fee simple title through a legal documents such as a recorded deed.
- This means that you must own the site by January 31, 2019 and retain ownership while grant funds are being dispersed for the cleanup of the site.
- ► See FY19 FAQs K.2.
- Affirm, in this criterion, that you own the site.

4. Basic Site Information

- Identify for your site(s):
 - a. The **name** of the site(s);
 - b. The address of the site(s), including zip code;
 - c. The current owner of the site(s);
 - d. If you are not the current owner, the date you plan to acquire ownership. This date must be before the proposal due date of January 31, 2019.



5. Status & History of Contamination at the Site

- Identify for your site(s):
 - a) Hazardous Substances and/or petroleum contamination;
 - b) Operational history and current uses;
 - c) Known environmental concerns; and
 - d) How the site(s) became contaminated and the nature and extent of the contamination.



6. Brownfields Site Definition



- Affirm that your site is:
 - a. Not listed or proposed for listing on the National Priorities List (Superfund Site);
 - b. Not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued under CERCLA; and
 - c. Not subject to jurisdiction, custody, or control of the U.S. government.



7. Environmental Assessment Required for Cleanup Grant Proposals

- A written ASTM E1903-11 or equivalent Phase II report (draft is ok) must be completed prior to proposal submission.
- Describe the type of environmental assessments conducted and provide the date(s) of the ASTM E1903-11 or equivalent Phase II report(s).
- Equivalent reports can include site investigations or remedial action plans developed for state cleanup programs. See FY19 FAQs K.15.
- Do not attach assessment reports.

8. Enforcement or Other Actions

- Identify any ongoing or anticipated enforcement actions on your site(s).
- Describe any inquiries or orders from federal, state or local enforcement entities, including any liens.
- Information you provide may be verified and EPA may conduct an independent review of your responsibility for the contamination at this site.

9. Sites Requiring a Property-Specific Determination

- See list on page 14-15 in the guidelines and Section 1.5 in Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k) to see if your site needs a property-specific determination.
- A property-specific determination describes how cleaning up your site will protect human health and the environment and either
 - Promote economic development, or
 - Enable the property to be used for parks, greenways, recreational or non-profit purposes.

9. Sites Requiring a Property-Specific Determination

- For information on how to prepare a property-specific determination, see See FY19 FAQs H.7.
- Contact Jim Byrne at 617-918-1389 if you think your site requires a Property-Specific Determination.
- If **not required**, affirm that the site(s) do not need a property-specific determination.
- ► The Property-Specific Determination is an attachment to your proposal.



9. Sites Requiring a Property-Specific Determination

- These sites are usually:
 - Subject to planned or ongoing removal actions under CERCLA;
 - Have been issued unilateral administrative orders, court orders, administrative orders on consent, judicial consent decree or permits under RCRA, FWPCA, TSCA or SDWA;
 - Subject to RCRA corrective action (§3004(u) or §3008(h));
 - Have submitted a RCRA closure notification or subject to closure requirements;
 - Where a release of PCBs is subject to remediation under TSCA;
 - Receiving funds from the LUST Trust Fund.



10. Threshold Criteria Related to CERCLA/Petroleum Liability

Threshold Criteria

- If your site is a hazardous substances site, you must respond to the items in section (a).
- If your site is a petroleum site, you must respond to the items in section (b).
- If your site is a co-mingled hazardous substances and petroleum site, you must determine which one is predominant and respond to the appropriate section.
- If your site has both hazardous substances and petroleum contamination, you must respond to all items in sections (a) & (b).

10. Threshold Criteria Related to CERCLA/Petroleum Liability

EPA Region 1 Brownfields

a. Property Ownership Eligibility - Hazardous Substances Sites

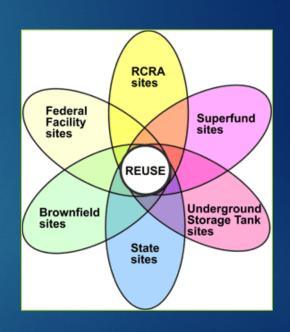
- Read the supporting information on page 15-16 pertaining to property ownership and liability defenses.
- You must demonstrate that you:
 - Are exempt or excluded from CERCLA liability; or
 - Qualify for funding because the property was purchased by a governmental entity prior to January 11, 2002; or
 - Meet the requirements for an affirmative defense to CERCLA liability.

10. Threshold Criteria Related to CERCLA/Petroleum Liability



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- a. Property Ownership Eligibility Hazardous Substances Sites
 - You must respond to the appropriate item:
 - i. Exemptions to CERCLA Liability
 - ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability
 - iii. Landowner Liability Protections from CERCLA Liability





You need to respond to only one of these items.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

EPA Region 1 Brownfields

a.i Exemptions to CERCLA Liability

- 1) Indian Tribes
 - Tribes are considered exempt from CERCLA liability.
 - To respond to this criterion, you need to affirm that you are an Indian tribe and are exempt from demonstrating that you meet the requirements of a CERCLA liability defense.
- 2) Alaska Native Village Corporations & Alaska Native Regional Corporations
 - Not applicable to New England.



10. Threshold Criteria Related to CERCLA/Petroleum Liability

EPA Region 1 Brownfields

a.i Exemptions to CERCLA Liability

- 3) Property Acquired Under Certain Circumstances by Units of State & Local Government
 - If you did not cause or contribute to contamination at the site and acquired the property as indicated below, you are exempt from CERCLA liability.
 - Seizure or in connection with law enforcement activity
 - Bankruptcy
 - Tax delinquency
 - Abandonment
 - Other circumstances where property was acquired by virtue of your function as sovereign

10. Threshold Criteria Related to CERCLA/Petroleum Liability

- a.i Exemptions & Exclusions to CERCLA Liability
 - 3) Certain Circumstances for State & Local Government
 - To respond to this criterion, you need to:
 - a) Describe in detail the circumstances of the acquisition.
 - b) Provide date of the acquisition.
 - c) Identify whether all disposal of hazardous substances occurred before you acquired the site and if you caused or contributed to any release of hazardous substances at the site.
 - d) Affirm that you have not arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

10. Threshold Criteria Related to CERCLA/Petroleum Liability



- a.ii Exemptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability
 - 1) Publicly Owned Brownfields Sites Acquired Prior to January 11, 2002
 - Under Section 7 of the BUILD Act, if you (state or local government) acquired a property prior to January 11, 2002, you are eligible even if you do not qualify as a bona fide prospective purchaser, provided you did not cause or contribute to the contamination at the property.

10. Threshold Criteria Related to CERCLA/Petroleum Liability



- a.ii Exemptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability
 - 1) Publicly Owned Brownfields Sites Acquired Prior to January 11, 2002
 - To respond to this criterion, you need to:
 - a) Describe in detail the circumstances of the acquisition.
 - b) Provide date of the acquisition.
 - c) Identify whether all disposal of hazardous substances occurred before you acquired the property and if you caused or contributed to any release of hazardous substances at the site.
 - d) Affirm that you have not arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

EPA Region 1 Brownfields

a.iii Landowner Liability Protections from CERCLA Liability

- State, local governments, and non-profit organizations must show they are a bona fide prospective purchaser (BFPP), contiguous property owner (CPO), or innocent landowner (ILO).
- This is required if you do not qualify for one of the prior exemptions.
- The BFPP defense is the most common.
- BFPP compliance requirements are on pages 18-19 of the Cleanup Guidelines.

10. Threshold Criteria Related to CERCLA/Petroleum Liability



EPA Region 1 Brownfields

a.iii Landowner Liability Protections from CERCLA Liability

- 1) Bona Fide Prospective Purchaser Defense
 - a) Information on the Property Acquisition
 - b) Pre-Purchase Inquiry
 - c) Timing and/or Contribution Toward Hazardous Substances Disposal
 - d) Post-Acquisition Uses
 - e) Continuing Obligations



10. Threshold Criteria Related to CERCLA/Petroleum Liability

EPA Region 1 Brownfields

a.iii.a) Information on the Property Acquisition

- To respond to this criterion, you need to:
 - i. Describe how you acquired or will acquire the property;
 - ii. Provide the date you acquired the property;
 - iii. Describe the nature of your ownership (fee simple title);
 - iv. Provide the name and identity of the party from whom you acquired ownership; and
 - v. Describe all relationships you have or had with all prior owners or operators.

10. Threshold Criteria Related to CERCLA/Petroleum Liability



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a.iii.b) Pre-Purchase Inquiry

- To respond to this criterion, you need to:
 - Describe the types of site assessments performed
 - ✓ ASTM Phase I or AAI.
 - The dates of each assessment.
 - The entity the assessments were completed for.
 - ii. Describe who performed the AAI or Phase I investigation and identify their qualifications to perform such work.
 - iii. If your original Phase I or AAI investigation was performed more than 180 days prior to your acquisition of the property, affirm that you conducted the appropriate updates.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

EPA Region 1 Brownfields

a.iii.c) Timing and/or Contribution Toward HazardousSubstances Disposal

- To respond to this criterion, you need to:
 - ✓ Identify whether all disposal of hazardous substances at the site occurred before you acquired the property **and** whether you caused or contributed to any release.
 - ✓ Affirm that you have not arranged for the disposal of or have transported hazardous substances to the site.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

EPA Region 1 Brownfields

a.iii.d) Post Acquisition Uses

- To respond to this criterion, you need to:
 - Describe all uses of the property since you acquired ownership, including any uses by persons or entities other than you.
 - ✓ Provide a time-line with the:
 - Names of all current and prior users during the time of your ownership;
 - Dates of all uses;
 - Details of all uses; and
 - Your relationship to all users.

10. Threshold Criteria Related to CERCLA/Petroleum Liability



EPA Region 1 Brownfields

a.iii.e) Continuing Obligations

- To respond to this criterion, you need to:
 - Describe in detail the specific reasonable steps that you took with respect to hazardous substances found at the site to:
 - Stop any continuing releases;
 - ii. Prevent any threatened future release; and
 - iii. Prevent or limit exposure to any previous releases.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

EPA Region 1 Brownfields

a.iii.e) Continuing Obligations

- To respond to this criterion, you need to: (continued)
 - Confirm your commitment to:
 - Comply with all land-use restrictions and not impede the effectiveness or integrity of any institutional controls;
 - ii. Assist and cooperate with those performing cleanup and provide access to the site;
 - Comply with all information requests and administrative subpoenas; and
 - iv. Provide all legally required notices.

10. Threshold Criteria Related to CERCLA/Petroleum Liability



EPA Region 1 Brownfields

b. Property Ownership Eligibility – Petroleum Sites

- Read the supporting information on pages 21-22 and Section
 1.3.2 in Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k) pertaining to petroleum site eligibility.
- See FY19 FAQs Q.1-8 for additional information.
- You must submit the requested information to your state Brownfields Coordinator to make the petroleum determination.
- Attach the state's petroleum determination letter to your proposal.
- For Tribes: Submit the required information as an attachment to your proposal. EPA will make the petroleum determination.

10. Threshold Criteria Related to CERCLA/Petroleum Liability

- b.i Information Required for a Petroleum Site Eligibility Determination:
 - 1) Current & Immediate Past Owners
 - 2) Acquisition of Site
 - 3) No Responsible Party for the Site
 - 4) Cleaned Up by a Person Not Potentially Liable
 - 5) Judgments, Orders, or Third Party Suits
 - 6) Subject to RCRA
 - 7) Financial Viability of Responsible Parties



- a. Describe how you will oversee the cleanup
 - Discuss who will oversee the cleanup (QEP, LSP, LEP, State)
 - Indicate that you will enroll the site in your state response program.
 - If you plan to procure a Qualified Environmental Professional (QEP) to oversee the cleanup of your site, explain how you will ensure they are in place before cleanup begins and that they will be acquired consistent with the applicable competitive procurement provisions (See 2 CFR 200.317-326).

Threshold Criteria 11. Cleanup Authority & Oversight Structure

- b. Plan to acquire access to adjacent properties
 - Cleanup response activities often impact adjacent or neighboring properties. If this type of access is needed, provide your plan to acquire access to the relevant properties.



Threshold Criteria 12. Community Notification

- ➤ You must provide the community with notice of your intent to apply for an EPA Cleanup Grant and an opportunity to submit comments on your draft grant proposal. You must provide a summary of the comments and your responses to those comments to EPA.
- You must do these activities prior to submittal of your proposal. If you do not do them, you will be disqualified from the competition.
- If you are including multiple sites in your proposal, one notification ad & meeting are acceptable as long as all target communities are involved.

- a. Draft Analysis of Brownfields Cleanup Alternatives
- b. Community Notification Ad
- c. Public Meeting
- d. Submission of Community Notification Documents



Threshold Criteria 12. Community Notification

- a. Draft Analysis of Brownfields Cleanup Alternatives (ABCA)
 - You must attach a Draft ABCA to your proposal.
 - Your ABCA must briefly summarize information about:
 - The site, contamination issues, cleanup standards, and applicable laws;
 - ✓ The cleanup alternatives considered and for each alternative:
 - Its effectiveness,
 - Your ability to implement it,
 - Its resiliency to potential impacts form extreme weather events,
 - Its cost and reasonableness.
 - ✓ The proposed cleanup.

Threshold Criteria 12. Community Notification

- a. Draft Analysis of Brownfields Cleanup Alternatives (ABCA)
 - Content requirements are in Section VI.D.3.a & FY19 FAQs K.16-17. An example ABCA template is available on our website to help you with this requirement.
 - The information in your ABCA should be coordinated with your response to Ranking Criterion 2.a.ii – Proposed Cleanup Plan.
 - If you have a multi-site proposal, you must include a draft ABCA for each site.

b. Community Notification Ad

- You must publish an ad in your local newspaper or an equivalent means at least two weeks prior to the submittal date and no later than January 17, 2019.
- Your ad must clearly indicate:
 - ✓ That a copy of this grant proposal, including the draft ABCA, is available for public review and comment;
 - How to comment on the draft proposal;
 - Where the draft proposal is located (e.g. town hall, library, website, etc.); and
 - The date and time of a public meeting you will hold prior to submittal of this proposal.

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b. Community Notification Ad

- Make sure all targeted communities receive notification and have an opportunity to provide comments.
- If you are proposing more than one cleanup site, you may prepare a single community notification ad and conduct one meeting.
- See FY19 FAQs K.12-13 for examples of acceptable community notification methods.



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Threshold Criteria 12. Community Notification

EPA Region 1 Brownfields

c. Public Meeting

- You must hold a public meeting to discuss the draft proposal and consider public comments prior to submittal of your proposal. A regularly scheduled community meeting is sufficient if enough time is provided to discuss the draft proposal.
- From the meeting, you must produce:
 - The comments or a summary of the public comments received;
 - ✓ Your response to those comments;
 - Meeting notes or a summary of the public meeting(s); and
 - ✓ Meeting sign-in sheets.

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d. Submission of Community Notification Documents

- You must attach the following to your proposal:
 - A copy of the draft ABCA(s);
 - A copy of the ad (showing the date of publication) that demonstrates notification to the public and solicitation of comments;
 - The comments or a summary of the comments received;
 - Your response to the public comments;
 - Meeting notes or summary from the public meeting(s); and
 - Meeting sign-in sheets.

Threshold Criteria 13. Statutory Cost Share

- Cleanup grant recipients are required to provide a 20% cost share.
- This is \$40,000 for a \$200,000 grant or \$100,000 for a \$500,000 grant.
- Cost share must be in the form of a contribution of:
 - Money
 - Labor
 - Materials
 - Services from a non-federal source
- Cost share must be incurred for eligible and allowable cleanup costs and may include administrative costs.
- See FY19 FAQs M.1-4. for more information.
- ► Tribes, nonprofit organizations, and government with a population of 50,000 and fewer may petition EPA to waive the cost share.

Threshold Criteria 13. Statutory Cost Share

- a. Describe your plans for meeting the cost share, including the sources of the funding and/or services.
 - Refer to FY19 FAQs F.10-11 for prohibited costs.
 - Refer to this link for additional information on providing your cost share: http://www2.epa.gov/brownfields/cost-share-brownfields-and-land-revitalization-new-england



b. Hardship Cost Share Waiver

- If you are requesting a hardship waiver of the cost share, provide an explanation for the basis of your request as part of your proposal.
- This explanation must be submitted on a separate page, titled "Hardship Waiver Request", as an attachment to your proposal.
- The requirements for requesting this waiver are on page 26 of the Cleanup Guidelines.
- If you are concerned about meeting the cost share, don't hesitate to ask for the waiver.

- Your Authorized Organization Representative (AOR) must submit your proposal via <u>www.grants.gov</u>.
- Proposals must be received no later than 11:59 pm ET on January 31, 2019.
- In order to submit a proposal via www.grants.gov, you must:
 - Have an active DUNS number,
 - Have an active System for Award Management (SAM) account in www.sam.gov,
 - Be registered in <u>www.grants.gov</u>, and
 - Be designated a your organization's AOR.



- Data Universal Numbering System (DUNS)
 - ✓ DUNS information is located at http://www.dnb.com/.
 - Your organization must have a unique DUNS number.
- System for Award Management (SAM)
 - ✓ SAM information is located at: https://www.sam.gov.
 - Make sure you are active in SAM <u>before</u> submitting your proposal.
 - ✓ You must maintain an <u>active SAM registration</u> during the application, award and cooperative agreement time frames.



- Grants.gov
 - You must apply electronically through www.grants.gov.
 - ✓ See Appendix 1 on pages 51-55 of the Cleanup Guidelines.
- Your Organization's AOR
 - ✓ You must have your Authorized Organization Representative
 (AOR) submit your proposal via www.grants.gov.
 - Make sure your AOR is available to submit your proposal by the due date.

- Make sure your organization's information is consistent with EPA, DUNS and SAM.
- The registration process for www.sam.gov and www.grants.gov can take up to a month or more.
 - Register ASAP.
- Make sure you allow enough time to successfully submit your proposal and to fix unexpected errors.
- Proposals received after the due date will not be considered.
- See page 27 of the Cleanup Guidelines and FY19 FAQs B.5-10 for more information.

- Your Proposals must:
 - ✓ Be in English.
 - ✓ Be typed, single-spaced, on letter sized paper (8 $\frac{1}{2}$ x 11).
 - Use standard Times New Roman, Ariel or Calibri fonts with a
 12 point font size.
- Proposals should not include color printing, photos and graphics.



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Section IV.C Content & Form of Proposal Submission

- Checklist
 - A list of all required items is located on pages 27-28.
 - Make sure you have included and attached all required and applicable items to your proposal in www.grants.gov.
- Pages in excess of page limits will be removed and not evaluated.
- Limit number of attachments to Threshold Criteria and required items. No other attachments will be considered!

- Application Materials (see Appendix 1 on page 53)
 - Application for Federal Assistance (SF-424)
 - Narrative Information Sheet (2 Pages) + Required Attachments
 - Narrative Proposal/Ranking Criteria (10 Pages)
 + Required Attachments
 - Threshold Criteria Responses
- See FY19 <u>FAQs</u> B.1-13.



You must include all 4 items for a complete proposal!



- The Narrative Information Sheet identifies you as the applicant, what you are applying for, and provides your contact information.
- The Narrative Information Sheet shall not exceed 2 single-spaced pages and must be on your organizations official letterhead.
- Narrative Information Sheet must address all of the requested items.
- ► See FY19 FAQs B.3.

- 1. Applicant Identification: Your entity's name & address
- 2. Funding Requested
 - a. Grant Type: Single Site Cleanup or Multiple Site Cleanup
 - b. Federal Funds Requested:
 - i. \$____ (requested amount)
 - ii. Indicate if waiver of cost share is being requested
 - c. Contamination: Hazardous Substances, Petroleum or Both. Note: If both, provide a breakdown of the amount of funding your are requesting per contaminant type.

- 3. Location:
 - a) Your City
 - b) Your County
 - c) Your State





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5. Contacts:

- a. Project Director: Name & contact information for the person who is the main point of contact and will be managing this grant if selected
- b. Chief Executive/Highest Ranking Official: Name & Contact information for the Mayor, Chief Executive or President of your organization

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6. Population:

- City or Town: Provide the population of your jurisdiction
- County/State/Regional Organization: Provide the population of each city/town within your jurisdiction
- Nonprofit or Community Development Entity: Provide the population of the city/town where you are located
- Tribe: Provide the number of tribal/non-tribal members effected.

Note: Population data is available at <u>www.census.gov</u>.



EPA Region 1 Brownfields

7. Other Factors Checklist: Identify items below that apply to your proposal

Other Factor	Page #
Community population is 10,000 or less.	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/redevelopment; secured resource is identified in the Narrative and substantiated in the attached documentation.	
The proposed site(s) is adjacent to a body of water (i.e., the border of the site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them.)	
The proposed site(s) is in a federally designated flood plain.	
The redevelopment of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	

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Section IV.D Narrative Information Sheet

EPA Region 1 Brownfields

7. Other Factors Checklist

- Make sure you put the page number(s) next to the factors you are addressing in your proposal. Be kind to your reviewer!
- If none of these factors are applicable to you, make sure you provide a statement to indicate that they do not apply.
- See FY19 FAQs C.4.



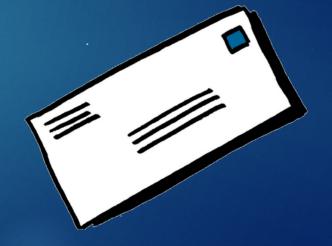
- 8. Letter from the State or Tribal Environmental Authority
 - Attach a current letter from your state or tribal environmental authority acknowledging that you plan to conduct cleanup activities and apply for grant funds.
 - If you are applying for multiple types of grants, you need to get only one letter from the state acknowledging the relevant grant activities. However you must provide the letter as an attachment to each proposal.
 - General letters of correspondence and documents evidencing state involvement are NOT acceptable.

- 8. Letter from the State or Tribal Environmental Authority
 - To request a letter from your State Brownfields Program Contact, please email the following information:
 - The grant(s) for which you are applying;
 - The site(s) for which you are applying, if site specific; and
 - To whom the letter should be addressed.



Section IV.D

You must get a new letter this year. Do not use last year's letter.



- 8. Letter from the State or Tribal Environmental Authority
 - Please give your State Brownfields Program Contact at least 2 weeks before the grant submittal deadline to provide you the letter.
 - For CT, information on how to request a letter is at:
 http://www.ct.gov/deep/cwp/view.asp?a=2715&q=489004&deepNav GID=1626#state.
 - For VT, when requesting your letter via email, please include in the subject line "State Letter for EPA Brownfields Grant."

Section IV.D Narrative Information Sheet

EPA Region 1 Brownfields

8. Letter from the State or Tribal Environmental Authority



Mark Lewis <u>mark.lewis@ct.gov</u> CT Department of Energy and Environmental Protection Office of Constituent Affairs & Land Management Hartford, CT 06106-5127 860-424-3768



Nick Hodgkins (nick.hodgkins@maine.gov) ME DEP, Brownfields Program 17 State House Station Augusta, ME 04333-0017 207-592-0882

TO STATES TO STATES

Section IV.D Narrative Information Sheet

EPA Region 1 Brownfields

8. Letter from the State or Tribal Environmental Authority



Angela Gallagher (angela.gallagher@state.ma.us)
Massachusetts Department of Environmental Protection
Bureau of Waste Site Cleanup
20 Riverside Drive
Lakeville, Massachusetts 02347
508-946-2790



Michael McCluskey (michael.mccluskey@des.nh.gov)
NH Department of Environmental Services

Hazardous Waste Remediation Bureau 29 Hazen Drive - PO Box 95 Concord, NH 03302-0095 603-271-2183

8. Letter from the State or Tribal Environmental Authority



Rachel Simpson (rachel.simpson@dem.ri.gov)
RI DEM - Office of Waste Management
235 Promenade Street
Providence, RI 02908-5767
401-222-2797 Ext. 7105



Patricia Coppolino (coppolino.patricia@vermont.gov)
VT Dept. of Environmental Conservation
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
802-249-5822

Section IV.E

Narrative Proposal/Ranking Criteria

- Includes responses to all Ranking Criteria found in Section IV.C.3 on pages 31-38.
- Evaluation Criteria (how your proposal will be evaluated and point scores) are in Section V.A on pages 40-45.
- The Narrative Proposal shall not exceed 10 single-spaced pages. Pages over the 10-page limit will not be evaluated.
- You must include page numbers, criteria numbers and titles in your narrative.
- If you are applying for multiple sites within the same proposal, your ranking criteria responses must include information on each site.

- 1. Project Area Description & Plans for Revitalization (30 points)
- 2. Community Need & Community Engagement (20 Points)
- Task Descriptions, Cost Estimates, & Measuring Progress (35 points)
- 4. Programmatic Capability & Past Performance (15 points)



Be sure to read each criterion carefully and make sure you respond to all sub-criteria.

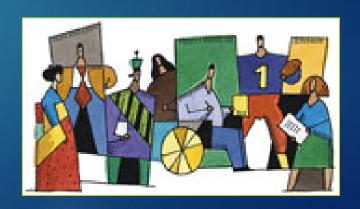
- a. Target Area & Brownfields (8 points)
 - i. Background & Description of Target Area (3 points)
 - ii. Description of the Brownfield Site(s) (5 points)
- b. Revitalization of the Target Area (12 points)
 - i. Redevelopment Strategy & Alignment with Revitalization Plans (7 points)
 - ii. Outcomes & Benefits of Redevelopment Strategy (5 points)
- c. Strategy for Leveraging Resources (10 points)
 - i. Resources Needed for Site Reuse (7 points)
 - ii. Use of Existing Infrastructure (3 points)

- i. Background & Description of Target Area (3 points)
 - You need to:
 - Include a brief description of your city, town, or geographic area to provide background on its cultural and industrial history that establishes your brownfield challenges and their impact on the community.
 - Identify and describe the specific target area(s) where you plan to perform the cleanup activities, such as a neighborhood, district, corridor, or census tract. Depending on the scope and design of your project, one or more target areas may be presented.

- i. Background & Description of Target Area (3 points)
 - You will be evaluated on:
 - The extent to which the description provides context of the brownfields challenges and the degree to which the challenges impact the community.
 - ✓ The extent to which a specific target area(s) is clearly defined.
 - The degree to which the project scope is conducive to carrying out the proposed project for the amount of funding being requested.

Narrative Proposal/Ranking Criteria 1.a Target Area & Brownfields (8 points)

- Background & Description of Target Area (3 points)
 - Think about:
 - ✓ Your <u>overall area/community</u> & <u>target area(s)</u> may contain:
 - Signs of distress, blight or neglect
 - Known or potential brownfields sites
 - Sensitive or vulnerable populations
 - Need for cleanup and redevelopment
 - Your property(ies) to be cleaned up



- ii. Description of the Brownfield Site(s) (5 points)
 - You need to:
 - Describe the property(ies) targeted for cleanup, characterizing known contamination and site conditions (including structures), and relative past and current land use.
 - If applicable, describe whether the proposed site(s) is located adjacent to a body of water or is in a federally designated flood plain.

- ii. Description of the Brownfield Site(s) (5 points)
 - You will be evaluated on:
 - The extent to which the description of the property(ies) targeted for cleanup provides clear information on the known contamination, the land uses, and site condition, and the degree of severity of the conditions.
 - When applicable, the extent to which the proposed site(s) is adjacent to a body of water or is in a federally designated flood plain.

- ii. Description of the Brownfield Site(s) (5 points)
 - Think about:
 - If the border of your proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them. Don't forget to note this on the Other Factors Checklist.

- i. Redevelopment Strategy & Alignment with Revitalization Plans (7 points)
 - You need to:
 - Describe the redevelopment strategy, or projected redevelopment, for the brownfields site(s) to be remediated in the target area.
 - Discuss how the redevelopment strategy/plans(s) aligns with the local government's land use and revitalization plans.



- Redevelopment Strategy & Alignment with Revitalization Plans (7 points)
 - You will be evaluated on:
 - The extent to which a redevelopment strategy is clearly identified for the proposed brownfield site(s).
 - The extent to which the redevelopment strategy/plan clearly aligns and advances the local government's land use and revitalization plans.

- Redevelopment Strategy & Alignment with Revitalization Plans (7 points)
 - Think about:
 - Referencing your current land use and revitalization plans and how your proposed site(s) fits into the overall vision.



- ii. Outcomes & Benefits of Redevelopment Strategy (5 points)
 - You need to describe:
 - The potential of the proposed project and revitalization plans to stimulate economic development in the target area upon completion of the cleanup of these properties, and/or
 - ✓ How the grant will facilitate the creation of, preservation of, or addition to a park, a greenway, undeveloped property, recreational property, or other property used for nonprofit purposes.
 - If applicable, describe how the redevelopment of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.

- ii. Outcomes & Benefits of Redevelopment Strategy (5 points)
 - You will be evaluated on:
 - The degree to which the proposed project and revitalization plans will substantially stimulate economic and/or noneconomic development in the target area.
 - The degree to which these outcomes correlate with the redevelopment strategy.
 - When applicable, the extent to which the redevelopment of the proposed site(s) will facilitate renewable energy or energy efficiency improvement projects.

- Outcomes & Benefits of Redevelopment Strategy (5 points)
 - Think about:
 - **Economic benefits**, such as:
 - Increased employment
 - Expanded tax base
 - Increased property values
 - ✓ See FY19 **FAQs S.1-4**.



- ii. Outcomes & Benefits of Redevelopment Strategy (5 points)
 - If applicable, think about:
 - Greenspace, such as:
 - Parks
 - Recreation areas
 - Greenways
 - Wetlands & open space



- ii. Outcomes & Benefits of Redevelopment Strategy (5 points)
 - If applicable, think about:
 - ✓ Non-Profit & Charitable Reuse such as:
 - Affordable housing
 - Community centers
 - Local governmental uses
 - How economic development and greenspace are not mutually exclusive.



Narrative Proposal/Ranking Criteria 1.b Revitalization of Target Area (12 points)

- ii. Outcomes & Benefits of Redevelopment Strategy (5 points)
 - If applicable, think about:
 - Renewable energy opportunities for your proposed site(s).



Narrative Proposal/Ranking Criteria 1.c Strategy for Leveraging Resources (10 points)

Resources Needed for Site Reuse (7 points)

You need to:

- Describe your eligibility for monetary funding from other resources and how the grant will stimulate the availability of additional funds for environmental assessment or remediation, and subsequent reuse (e.g. demolition, redevelopment activities, etc.) of the proposed site(s).
- Identify key funding resources that have been secured for use in the remediation and revitalization strategy for the proposed brownfield site(s).
- Attach documentation that substantiates secured commitments of leveraged funding. (Do not duplicate sources discussed in Description of Tasks and Activities or sources used to meet the cost-share.)

1.c Strategy for Leveraging Resources (10 points)

EPA Region 1 Brownfields

Resources Needed for Site Reuse (7 points)

Narrative Proposal/Ranking Criteria

You will be evaluated on:

- ✓ The extent the applicant is eligible for monetary funding from other sources, and the extent to which the grant will stimulate the availability of additional funds for environmental assessment or remediation, and subsequent reuse of the proposed site(s).
- The relevancy and degree to which the identified funding resources will substantially advance the current state of the proposed site(s) toward completed remediation and/or revitalization.

- Resources Needed for Site Reuse (7 points)
 - You will be evaluated on: (continued)
 - ✓ The degree to which attached documentation substantiates secured commitments discussed in the Narrative.
 - ✓ Note: A response may not earn full points if the applicant duplicates sources that are listed in Description of Tasks and Activities or sources used to meet the cost share. Additionally, responses may only earn full points when the applicant has resources that are secured, significant, and relevant to the cleanup project.

- Resources Needed for Site Reuse (7 points)
 - Think about:
 - ✓ Your eligibility to obtain funds from other resources for project related costs.
 - Clearly identifying the sources of these resources.
 - Secured funding sources for your proposed site(s). Attach appropriate documentation. Make sure you indicate this on the Other Factors Checklist.



- Resources Needed for Site Reuse (7 points)
 - Examples of secured commitments:
 - Other grant awards you have already received.
 - Firm commitment from a developer.
 - ✓ Loan or subgrant commitment from an RLF.
 - If documentation is missing, you may not receive full points.

Resources Needed for Site Reuse (7 points)

Narrative Proposal/Ranking Criteria

- **Examples of potential resources:**
 - Other grants
 - Historic tax credits
 - Federal (HUD HOME, HUD CDBG, EDA, DOI, TBA, Brownfields Tax Incentive)

1.c Strategy for Leveraging Resources (10 points)

- State (State TBA, Tax Credits, RLF)
- Local (TIF, Tax, Bond)
- Private (Foundation, Investors, Donations)





- ii. Use of Existing Infrastructure (3 points)
 - You need to:
 - Describe how this grant will facilitate the use of existing infrastructure at the proposed site(s) and/or within the target area(s).
 - If additional infrastructure needs are key to the revitalization plans for the proposed site(s), describe the infrastructure needs and funding resources that will be sought to implement that work.





- Use of Existing Infrastructure (3 points)
 - You will be evaluated on:
 - ✓ The extent to which this grant will facilitate the use of existing infrastructure for the proposed site(s) and/or target area(s).
 - If additional infrastructure needs are key to the revitalization plans for the proposed site(s), the extent to which the identified resources are relevant to the project.





- ii. Use of Existing Infrastructure (3 points)
 - Think about:
 - ✓ Water & Sewer
 - Power
 - Transportation
 - ✓ High Speed Internet
 - Continue the story from the previous criterion.



Narrative Proposal/Ranking Criteria 2. Community Need & Community Engagement



- a. Community Need (12 points)
 - i. The Community's Need for Funding (3 points)
 - ii. Threats to Sensitive Populations (9 points)
 - 1) Health or Welfare of Sensitive Populations (3 points)
 - 2) Greater Than Normal Incidence of Disease & Adverse Health Conditions (3 points)
 - Economically Impoverished/Disproportionately Impacted Populations (3 points)
- b. Community Engagement (12 points)
 - i. Community Involvement (7 points)
 - ii. Incorporating Community Input (5 points)

Narrative Proposal/Ranking Criteria 2.a Community Need (12 points)



- i. The Community's Need for Funding (3 points)
 - You Need to describe how this grant will meet the needs of the community that has an inability to draw on other initial sources of funding to carry out environmental remediation and subsequent redevelopment of the target area because of the small population and/or low income of the community.
 - You will be evaluated on the degree to which the community that will benefit from this grant is of small population and/or is low-income, and the extent either of these characteristics limit the community's ability to obtain initial funding to carry out environmental remediation and subsequent redevelopment.

Narrative Proposal/Ranking Criteria 2.a Community Need (12 points)



- i. The Community's Need for Funding (3 points)
 - Think about:
 - ✓ If the target community(ies):
 - Are of small population (10,000 or less) and/or
 - Have low income residents.
 - How this impacts the community's ability to obtain initial funding for your project.



- ii. Threats to Sensitive Populations (9 points)
 - 1) Health or Welfare of Sensitive Populations (3 points)
 - You need to describe how this grant will address or facilitate the identification and reduction of threats to the health or welfare of children, pregnant women, minority or low-income communities, or other sensitive populations in the target area(s).
 - You will be evaluated on the severity of the health or welfare issues experienced by the sensitive populations in the target area(s), and the extent to which this grant will address or facilitate the identification and reduction of those threats.
 - Refer to FY19 FAQs D.6 for information on health & welfare issues & FY19 FAQs R.3 for information on sensitive populations.



- ii. Threats to Sensitive Populations (9 points)
 - 1) Health or Welfare of Sensitive Populations (3 points)
 - For Health Issues, think about:
 - Health issues that are impacting your sensitive populations.
 - ✓ The availability of health department statistics.
 - Potential contamination pathways.
 - How this grant will help to reduce these threats.





- ii. Threats to Sensitive Populations (9 points)
 - 1) Health or Welfare of Sensitive Populations (3 points)
 - For Welfare Issues, think about
 - Social negatives such as blight, crime, vandalism, illegal dumping, people moving out, lack of neighborhood upkeep, and lack of prosperity.
 - Abandoned properties
 - Community disinvestment
 - Burden on municipal services
 - Other impacts specific to your targeted community(ies)



- ii. Threats to Sensitive Populations (9 points)
 - Greater Than Normal Incidence of Disease & Adverse Health Conditions (3 points)
 - You need to describe how this grant will address or facilitate the identification and reduction of threats to populations in the target area(s) that suffer from a greater-than-normal incidence of diseases or conditions (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum.



Narrative Proposal/Ranking Criteria 2.a Community Need (12 points)



- ii. Threats to Sensitive Populations (9 points)
 - Greater Than Normal Incidence of Disease & Adverse Health Conditions (3 points)
 - You will be evaluated on:
 - The degree to which populations in the target area(s) suffer from a greater-than-normal incidence of diseases or conditions (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum.
 - ✓ The extent to which this grant will address or facilitate the identification and reduction of those adverse health conditions.

Narrative Proposal/Ranking Criteria 2.a Community Need (12 points)



EPA Region 1 Brownfields

- ii. Threats to Sensitive Populations (9 points)
 - 2) Greater Than Normal Incidence of Disease & Adverse Health Conditions (3 points)
 - Think about:
 - ✓ The potential contaminants that may be connected to your site(s).
 - The potential health threats that may affect your community such as:
 - Cancer rates

Blood lead levels

Asthma rates

- Obesity
- Birth defect rates



Narrative Proposal/Ranking Criteria 2.a Community Need (12 points)



EPA Region 1 Brownfields

- ii. Threats to Sensitive Populations (9 points)
 - 3) Economically Impoverished/Disproportionately Impacted Populations (3 points)
 - You need to describe how this grant will address or facilitate the identification and reduction of threats to the populations in the target area(s) that are economically impoverished and/or disproportionately share the negative environmental

consequences resulting from industrial, governmental, and/or commercial operations or policies.

Narrative Proposal/Ranking Criteria 2.a Community Need (12 points)



- ii. Threats to Sensitive Populations (9 points)
 - Economically Impoverished/Disproportionately Impacted Populations (3 points)
 - You will be evaluated on:
 - ✓ The degree to which populations in the target area(s) are economically impoverished and/or disproportionately share the negative environmental consequences resulting from industrial, governmental and/or commercial operations or policies.
 - ✓ The extent to which this grant will address or facilitate the identification and reduction of those threats.

Narrative Proposal/Ranking Criteria 2.a Community Need (12 points)



- ii. Threats to Sensitive Populations (9 points)
 - Economically Impoverished/Disproportionately Impacted Populations (3 points)
 - Think about:
 - ✓ Lack of job opportunities
 - ✓ Lack of access to services
 - ✓ Lack of public transportation
 - Zoning issues
 - ✓ Food deserts

- Loss of population
- Air pollution
- Drinking water & soil issues
- Low property values
- Disinvestment

Narrative Proposal/Ranking Criteria 2.b Community Engagement (8 points)



- Community Involvement (5 points)
 - You need to:
 - Identify the local community partners that will be involved in the project.
 - Describe the role each identified partner will have in the project and how it will be involved in making decisions with respect to site selection, cleanup, and future redevelopment of the proposed brownfield site(s). See suggested table format below.
 - The local community partners may include community organizations (e.g., neighborhood groups, citizen groups, business organizations, etc.), as well as property owners, lenders, developers, and the general public.



- Community Involvement (5 points)
 - Sample Format for List of Project Partners

Partner Name	Point of contact (name, email & phone)	Specific role in the project	
Add rows as needed			

Narrative Proposal/Ranking Criteria 2.b Community Engagement (8 points)



- Community Involvement (5 points)
 - You be evaluated on:
 - The degree to which each entity is a local community partner and the degree to which each community partner is relevant to the proposed project.
 - ✓ The degree to which each identified community partner will have meaningful involvement in the site selection, cleanup, <u>and</u> future redevelopment of the brownfield sites, including the proposed site(s).



Narrative Proposal/Ranking Criteria 2.b Community Engagement (8 points)



- Community Involvement (5 points)
 - Think about:
 - Your community partners and how they are relevant and meaningful to your project.
 - ✓ How will they be involved in the cleanup & future redevelopment?
 - ✓ This is much more than just support, it's active participation!
 - ✓ See FY19 FAQs D.4-5.

Community Involvement (5 points)

Examples of Community Partners

- Environmental non-profits (i.e. rail to trail type organizations)
- Economic development organizations
- Community Development Corporations (CDCs)
- Social services providers
- Downtown development committees
- Chambers of Commerce
- ✓ Churches
- ✓ Property Owners

- Revitalization committees
- Affordable housing organizations
- Land trusts
- Neighborhood associations
- Regional economic strategy groups
- Health organizations
- Education institutions
- ✓ Historic and cultural organizations
- Lenders
- Developers

- Community Involvement (5 points)
 - Examples of Community Partner Roles
 - Participate on the cleanup project committee
 - Become involved in the cleanup/reuse planning process
 - Talk to their constituency about the site or the role of brownfields redevelopment in the targeted community

- Host public meetings
- Host design charrettes
- Help to post community outreach material on web and/or in newsletters
- Provide financial or legal advice
- Provide technical assistance

Narrative Proposal/Ranking Criteria 2.b Community Engagement (8 points)



EPA Region 1 Brownfields

ii. Incorporating Community Input (3 points)

You need to:

- Discuss your plan to communicate project progress to the local community including the frequency and by what method(s) you will use.
- ✓ How their input will be solicited, considered, and responded to.

You will be evaluated on:

- The extent to which the plan will be effective and appropriate to communicate project progress.
- The extent to which community input will be solicited, considered, and responded to in a meaningful way.

- ii. Incorporating Community Input (3 points)
 - Think about:
 - How these plans are appropriate for your targeted community.
 - ✓ How to convince the reviewer that your plan is effective.
 - Your sensitive and disproportionately impacted populations and how to accommodate them.



- The cost-share is calculated as 20% of the total EPA funds requested must only include costs associated with eligible activities under the grant.
- Local government applicants may use up to 10% of the total grant award for health monitoring activities. The health monitoring activities must be associated with brownfield sites at which at least a Phase II environmental site assessment is conducted and is contaminated with hazardous substances. Partnership with the local health agency is required. Please review the <u>Health</u> <u>Monitoring</u> fact sheet for more information.

Narrative Proposal/Ranking Criteria 3. Task Descriptions, Cost Estimates & Measuring Progress



- Administrative costs (direct costs for grant administration and indirect costs) may not exceed 5% of the total requested EPA funds. Note that EPA considers costs for performance and financial reporting to be allowable costs that are not subject to the 5% limitation. Costs must be classified as direct or indirect consistently and applicants may not classify the same cost in both categories.
- Do not include activities that are ineligible uses of funds under EPA's Cleanup Grant (e.g., land acquisition; building demolition that is not necessary to remediate contamination at the site; building construction for future redevelopment).

Narrative Proposal/Ranking Criteria 3. Task Descriptions, Cost Estimates & Measuring Progress



EPA Region 1 Brownfields

 Please refer to the FY19 FAQs for additional examples of eligible and ineligible uses of funds (including administrative costs). For questions not covered by the FY19 FAQs, contact your Regional Brownfields Contact listed in Section VII.

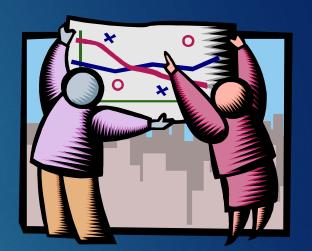


- a. Proposed Cleanup Plan (8 points)
- b. Description of Tasks & Activities (12 points)

Narrative Proposal/Ranking Criteria

3. Task Descriptions, Cost Estimates & Measuring Progress

- c. Cost Estimates & Outputs (10 points)
- d. Measuring Environmental Results: Anticipated Outputs/Outcomes (5 points)



Please refer to the FY19 FAQs for additional examples of eligible and ineligible uses of funds (including administrative costs). For questions not covered by the FY19 FAQs, contact your Regional Brownfields Contact listed in Section VII.



You need to:

- ✓ Outline the cleanup plan(s) proposed for the site(s).
- Briefly describe the contaminated media to be addressed, cleanup method(s) and disposal requirements.
- ✓ This description can use the same language as submitted in the draft ABCA attachment(s).

You will be evaluated on:

✓ The quality and reasonableness of the proposed cleanup plan(s), including the appropriateness of the cleanup methods being considered.

- When preparing your Proposed Cleanup Plan, think about:
 - ✓ The overall redevelopment vision for your target area.
 - Your vision for the site(s) funded by this grant.
 - The steps necessary to implement your project.
 - Making sure your project is going to benefit your target area.
 - Making sure you emphasize that your project is ready to go once you receive the grant!



You need to:

- Provide a list of tasks/activities required to implement the proposed project. For each task/activity identify the lead entity(ies) overseeing the various activities (i.e., the applicant, qualified environmental professional, or other identified entity).
 - Discuss the EPA-funded activities that will take place to address the brownfield site(s), and the anticipated schedule for those activities during the 3-year period of performance. Examples include:
 - Procuring a Qualified Environmental Professional
 - Submitting and obtaining approval of Quality Assurance Project Plan
 - Enrollment of site in the State's Voluntary Cleanup Program
 - Certifying cleanup is complete
 - Coordination with the local health agency on health monitoring activities, etc.

Narrative Proposal/Ranking Criteria 3.b Description of Tasks & Activities (12 points)

- You need to: (continued)
 - Discuss how the required 20% cost-share will be met.
 - If applicable, identify tasks and/or activities that are necessary to carry out the grant that will be contributed by sources other than the EPA grant; such as in-kind resources or funding contributed by your organization. (For example, you do not charge the EPA grant for salary dollars and therefore contribute its own resources to carry out programmatic over sight activities or grant administration. Do not duplicate sources listed in Resources Needed for Site Reuse or sources used to meet the cost-share.)

Narrative Proposal/Ranking Criteria 3.b Description of Tasks & Activities (12 points)



EPA Region 1 Brownfields

You will be evaluated on:

Project Implementation (6 points)

- ✓ The extent to which tasks and activities are eligible.
- ✓ The degree to which the tasks/activities are specific and appropriate to the goals of the proposed project.
- ✓ The degree to which the response demonstrates a sound plan to address the proposed site(s).
- ✓ The degree to which the approach demonstrates the applicant's readiness to achieve the project goals in an efficient manner.

- You will be evaluated on: (continued)
 - Project Implementation (6 points)
 - ✓ The extent to which the scheduled milestones are achievable, and the likelihood of the activities will be completed within the 3-year period of performance.
 - ✓ When applicable, the extent to which other resources (e.g. in-kind resources) will bridge the gap between the EPA grant and activities necessary to bring the grant to successful completion. Note: A response may not earn full points if the applicant duplicates sources that are listed in Resources Needed for Site Reuse or sources used to meet the cost share.

- Think about doing it this way:
 - Project Implementation (6 points)
 - ✓ Identify Task 1 as "Cooperative Agreement Oversight" and include such items as grant management, and your travel and supply costs.
 - ✓ Include the most common major tasks:
 - Task 1 Cooperative Agreement Oversight
 - Task 2 Community Outreach & Engagement
 - Task 3 Site-Specific Activities
 - Task 4 Oversee Site Clean



- Think about doing it this way: (continued)
 - Project Implementation (6 points)
 - ✓ Do not include tasks for activities that are ineligible uses of funds. See FY19 FAQs F.10-11.
 - ✓ Stick to a total of 4 Tasks.
 - ✓ DO NOT include any equipment costs.
 - ✓ DO NOT use the term 'consultant'.
 - Do not allocate more than 10% of funds toward personnel costs. If your estimate of these costs is higher than 10%, explain why and who is doing what to justify your costs.

- Think about doing it this way: (continued)
 - Project Implementation (6 points)
 - ✓ If applicable, describe any additional funding your organization will provide, such as in-kind services (e.g. personnel), that will help carry out this grant. Be careful not to duplicate sources you described in Resources Needed for Site Reuse.
 - ✓ If applying for both hazardous substances and petroleum funding, clearly differentiate both sources of funding in your task descriptions.
 - Go into greater depth when describing your tasks and linking it to a realistic schedule within the grant period of performance.

Examples of EPA Funded Activities

- Procuring a Qualified Environmental Professional (QEP)
- Preparing Quality Assurance Project Plan (QAPP)
- Public meeting for ABCA
- State-required documents
- Procuring a cleanup contractor
- Other eligible cleanup activities that are needed to accomplish your project goals.



- You will be evaluated on: (continued)
 - Task/Activity Lead (3 points)
 - ✓ The extent to which the entity overseeing each task/activity is appropriate.
 - The degree to which the applicant will direct grant activities.
 - ✓ When applicable, the degree to which the local health agency is involved in health monitoring activities.



- You will be evaluated on: (continued)
 - Cost Share (3 points)
 - ✓ The extent to which the entire cost share will be met with eligible activities.

Think about:

- ✓ In-kind services (police details, DPW assistance, supplies, personnel time to manage the grant, etc.)
- Provide the source and for what task.
- Third party contributions (from a developer, etc.)

You need to:

- You may use the sample table format on **page 35** to present how you plan to allocate grant funds for tasks/activities described in **Section IV.E.3.b.** by budget category. Replace the task number heading in the sample table with the actual title of the task.
- ✓ Only include EPA grant funds and the required cost share in this table. Leveraged resources should not be included in the budget table.

You need to: (continued)

- ✓ If you are requesting hazardous substances and petroleum funding, provide either woo separate line items within one budget table, which distinguish hazardous substances funds from petroleum funds.
- ✓ If you are seeking funding to remediate **multiple sites**, provide either a <u>separate budget table for each site</u>, or <u>separate line</u> items within one budget table, which distinguish each site.

Narrative Proposal/Ranking Criteria 3.c Cost Estimates & Outputs (10 points)

EPA Region 1 Brownfields

- You need to: (continued)
 - Describe how costs for <u>each</u> task were developed (per budget category; including the cost share), and, where appropriate, present costs per unit and the anticipated outputs/deliverables.
 - Examples of costs per unit may include:

Task 2, Tank Removal

- Personnel Costs: 20 hours at average rate of \$50/hr = \$1,000
- Contractual Costs: 5 tank pulls at cost of \$13,000 per tank pull = \$65,000
- Outputs may include, but are not limited to, cleanup plans, community involvement plans, final ABCA documents, administrative records, and cleanup completion report or letter. (Refer to **Section I.D.** for an explanation of outputs.)

Narrative Proposal/Ranking Criteria 3.c Cost Estimates & Outputs (10 points)

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EPA Region 1 Brownfields

Sample Format for Budget

Budget Categories		Project Tasks (\$)					
		(Task 1)	(Task 2)	(Task 3)	(Task 4)	Total	
Direct Costs	Personnel						
	Fringe Benefits						
	Travel ¹						
	Equipment ²						
	Supplies						
	Contractual						
	Other (include subawards) (specify)						
Total Direct Costs ³							
Indirect Costs ³							
Total Federal Funding (not to exceed \$500,000)							
Cost Share (20% of requested federal funds) ⁴							
Total Budget (Total Direct Costs + Indirect Costs + Cost Share)							

¹ Travel to brownfields-related training conferences is an acceptable use of these grant funds.

² EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for Brownfields Grants.

³ Administrative costs (direct and/or indirect) cannot exceed 5% of the total EPA-requested funds.

⁴ Applicants must include the cost-share in the budget even if applying for a cost share waiver. If the applicant is successful and the cost-share waiver is approved, it will be removed in pre-award negotiation.

Narrative Proposal/Ranking Criteria 3.c Cost Estimates & Outputs (10 points)



EPA Region 1 Brownfields

You be evaluated on:

Cost Estimates (7 points)

- ✓ The extent to which <u>each</u> cost is eligible, appropriate, reasonable, and realistic to implement the project.
- ✓ The degree to which costs clearly correlate with the proposed tasks and activities.
- ✓ The degree of clarity on how <u>each</u> cost (including the cost share) was developed and the extent to which costs per unit are presented in detail.
- When applicable, the degree to which hazardous substance and petroleum funds are distinguished, and the degree to which costs for individual sites are distinguished.

Narrative Proposal/Ranking Criteria 3.c Cost Estimates & Outputs (10 points)



EPA Region 1 Brownfields

Examples of Cost Estimates

- ✓ <u>Personnel costs grant funded</u>: Be precise in explaining what your personnel cost will be who is doing what. Project Manager at \$xx/hr times xx hours = \$xx. Describe what each person is going to do.
- Personnel costs cost share: Include a statement that describes where the funds are coming from; e.g., town funds, organization budget (you are not required to break down costs.)

Examples of Cost Estimates

- ✓ <u>Travel costs grant funded:</u> 2 people to 1 Brownfields conference, estimate \$xx Airfare/lodging/per diem for each = \$xx; \$xx set aside for local travel (estimate xx miles at \$0.55/mile).
- ✓ <u>Supplies grant funded:</u> Provide a list of supplies reflective of cost in table.
- Contractual grant funded: Estimate soil removal at \$xx/ton x 30 tons + placement of cap material = \$xx total contractual cost in task.

- Think about:
 - Cost Estimates (7 points)
 - Including some personnel, supplies, or travel costs in your budget. In other words, do not put all your dollars on the "Contractual" line.



148

- You will be evaluated on:
 - Outputs (3 points)
 - ✓ The quality of the specific outputs and the extent to which the outputs correlate with the proposed project, and the likelihood the outputs will be achieved within the 3-year period of performance.



Think about:

Outputs (3 points)

- ✓ Fully describing the outputs/deliverables you will achieve in the 3-year grant period (explanation in **Section I.D**).
 - Cleanup Plans
 - Community Involvement Plans
 - Final ABCA
 - Administrative Records
 - Cleanup Completion Reports or Letter



Narrative Proposal/Ranking Criteria 3.d Measuring Environmental Results (5 points)



EPA Region 1 Brownfields

 You need to discuss how you plan to track, measure and evaluate your progress in achieving these project outputs, overall project results, and eventual project outcomes to ensure the grant funds are expended in a timely and efficient manner. (Definitions of outputs and outcomes are provided in Section I.D.)

Narrative Proposal/Ranking Criteria 3.d Measuring Environmental Results (5 points)



EPA Region 1 Brownfields

You will be evaluated on:

- The extent to which the plan and mechanism to track, measure and evaluate project progress in achieving expected outputs, outcomes, and results are reasonable and appropriate.
- ▼ The degree to which the applicant can easily identify when the project is or is not on schedule.
- ✓ The extent to which project goals will be achieved in an efficient manner.

Think about:

- ✓ A reasonable plan to track, measure, and evaluate your project progress via:
 - ACRES
 - Quarterly Reporting
 - Work Plans/Project Schedule
- Do you have a system in place to monitor progress?
- ✓ What you will do if your project is not on schedule?
- How project goals will be achieved in an efficient manner.

Narrative Proposal/Ranking Criteria

4. Programmatic Capability & Past Performance (15 points)



EPA Region 1 Brownfields

- a. Programmatic Capability (9 points)
 - i. Organizational Structure (5 points)
 - ii. Acquiring Additional Resources (4 points)
- b. Past Performance & Accomplishments
 - i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (6 points)
 - iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements (3 points)



Note: This must be from the applicant's perspective



- i. Organizational Structure (5 points)
 - You need to:
 - Describe the organizational structure you will utilize to ensure the timely and successful expenditure of funds and completion of all technical, administrative and financial requirements of the project and grant.
 - Include a brief discussion of the key staff including their roles, expertise, qualifications, and experience.



- i. Organizational Structure (5 points)
 - You will be evaluated on:
 - The degree to which the applicant's organization has the programmatic and administrative capacity to successfully manage and complete the grant within the 3-year period of performance.
 - The degree of efficiency and effectiveness of the organizational structure to ensure the timely and successful expenditure of funds to complete all technical, administrative and financial requirements of the grant.
 - ✓ The degree of expertise, qualifications, and experience of key staff that will result in the successful administration of the grant.

- i. Organizational Structure (5 points)
 - Think about:
 - Your ability to manage and complete your cleanup in 3-years.
 - ✓ Your project management team (technical, financial & administrative) and how they will manage this grant.
 - Name names and discuss the experience and qualifications of your key staff members.



- ii. Acquiring Additional Resources (4 points)
 - You need to describe the system(s) you have in place to appropriately acquire any additional expertise and resources (e.g. contractors or subrecipients) required per grant requirements to successfully complete the project. (Refer to Section IV.G. regarding the difference between contractors & subrecipients.)
 - You will be evaluated on the degree to which the applicant's
 organization has the ability to acquire any additional expertise
 and resources (e.g. contractors or subrecipients) required to
 successfully complete the project.

- ii. Acquiring Additional Resources (4 points)
 - Think about:
 - Your organization's competitive procurement methods to acquire needed expertise and resources (State & Federal procurement requirements).
 - Qualified Environmental Professional (QEP)
 - Cleanup contractors



59 NATES STATES

EPA Region 1 Brownfields

- Currently Has or Previously Received an EPA Brownfields Grant (6 points)
- ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (6 points)

Narrative Proposal/Ranking Criteria

4.b Past Performance & Accomplishments

iii. Has Never Received Any Type of Federal or Non-Federal Assistance Agreements (3 points)



You must respond to only one of these criteria. Be careful which one you respond to!

- If you have ever received an EPA Brownfields Assessment, Cleanup, Revolving Loan Fund Grant, and/or 128(a) Grant please respond to item i. (Do not include information on Targeted Brownfields Assessments, Area-Wide Planning grants, Environmental Workforce Development & Job Training grants, and subawards from another Brownfield grant recipient.)
- If you have never received an EPA Brownfields Grant, but have received other federal or non-federal assistance agreements (such as a grant or cooperative agreement), please respond to item ii.
- If you have never received any type of federal or non-federal assistance agreements, please indicate this in response to item iii.

- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - Identify and provide information regarding each of your current and/or most recent EPA Brownfields Grant(s) (No more than three).
 - Demonstrate how you successfully managed the grant(s), and successfully performed all phases of work under each grant by providing information on the items listed below.
 - 1) Accomplishments (3 points)
 - 2) Compliance with Grant Requirements (3 points)

- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - Accomplishments (3 points)
 - You need to:
 - Describe the accomplishments (including specific outputs and outcomes) of the current/prior grant(s), including at a minimum, the number of sites assessed and/or cleaned up.
 - Discuss whether these outputs and outcomes were accurately reflected in the Assessment, Cleanup and Redevelopment Exchange System (ACRES) at the time of this proposal submission, and if not, please explain why.

- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - Accomplishments (3 points)
 - You will be evaluated on:
 - The quality of the accomplishments (including specific outputs and outcomes) under current/prior grant(s), including at a minimum, the number of sites assessed and/or cleaned up.
 - The extent to which outputs and outcomes were accurately reflected in the ACRES at the time of this proposal submission.





- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - Accomplishments (3 points)
 - Think about:
 - Looking in ACRES for your past accomplishments.
 - ✓ If you have reported accomplishments in ACRES and are up to date as of the time you submit your proposal.

- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - 2) Compliance with Grant Requirements (3 points)
 - You need to:
 - Discuss your compliance with the workplan, schedule, and terms and conditions under the current/prior grant(s). Include whether you have made and have reported on, or are making and reporting on, progress towards achieving the expected results of the grant in a timely manner. If not, discuss what corrective measures you took, or are taking, and how the corrective measures were effective, documented and communicated.
 - Discuss your history of timely and acceptable quarterly performance and grant deliverables, as well as ongoing ACRES reporting.

Narrative Proposal/Ranking Criteria 4.b Past Performance & Accomplishments

- Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - Compliance with Grant Requirements (3 points)
 - You need to: (continued)
 - ✓ For all open EPA Brownfields grant(s) indicate the grant period (start and end date), if there are funds remaining, and the plan to expend funds by the end of the grant period.
 - For all closed EPA Brownfields grant(s), indicate if there were funds remaining when the grant closed, the amount of remaining funds, and a brief explanation of why the funds were not expended.



- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - Compliance with Grant Requirements (3 points)
 - You will be evaluated on:
 - ▼ The extent of compliance with the workplan, schedule, and terms and conditions under the current/prior grant(s).
 - The degree to which progress was made (and reported on), or was being made, towards achieving the expected results of the grant(s) in a timely manner.
 - ✓ If expected results were not being reported on, the extent to which the measures taken to correct the situation were reasonable and appropriate or there is an adequate explanation for lack of reporting.

- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - 2) Compliance with Grant Requirements (3 points)
 - You will be evaluated on: (continued)
 - A demonstrated history of timely and acceptable quarterly performance and grant deliverables, as well as ongoing ACRES reporting.
 - The extent to which funds from any open EPA Brownfield grant(s) are committed to ongoing eligible grant activities or will support the tasks/activities described in this proposal.
 - The likelihood of all grant funds being expended by the end of the period of performance.

- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - 2) Compliance with Grant Requirements (3 points)
 - You will be evaluated on: (continued)
 - For all closed EPA Brownfields grants, the extent to which there is a reasonable explanation of why funds remained when the grant closed, and the degree to which the applicant made every effort to spend the remaining funds within the grant period of performance.



- i. Currently Has or Previously Received an EPA Brownfields Grant (6 points)
 - Compliance with Grant Requirements (3 points)
 - Think about:
 - Checking in with your Project Officer.
 - If you owe us reports, get them done ASAP! Update your quarterly report submissions and do your ACRES data input!

- ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (6 points)
 - Identify and describe each of your current and/or most recent federally or non-federally funded assistance agreements (no more than three) that are most similar in size, scope, and relevance to the proposed project.
 - Demonstrate how you successfully managed the agreement(s), and successfully performed all phases of work under each agreement by providing information.
 - Purpose & Accomplishments (3 points)
 - 2) Compliance with Grant Requirements (3 points)

- ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (6 points)
 - Purpose & Accomplishments (3 points)
 - You need to:
 - Describe the awarding agency/organization, amount of funding, and purpose of the assistance agreement(s) you have received.
 - Discuss the accomplishments (including specific outputs and outcomes) of the project supported by these assistance agreement(s), including specific measures of success for the project supported by each type of agreement received.

- ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (6 points)
 - Purpose & Accomplishments (3 points)
 - You will be evaluated on:
 - The extent to which similar past federal or non-federal assistance agreement(s) is identified (in terms of size, scope, and relevance to the proposed project) and the degree to which sufficient information is provided to make that determination.
 - The quality of the accomplishments (including specific outputs and outcomes) of the project supported by the assistance agreement(s), including specific measures of success for the project supported by each type of agreement received.

- ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (6 points)
 - Compliance with Grant Requirements (3 points)
 - You need to:
 - Describe your compliance with the workplan, schedule, and terms and conditions under the current/prior assistance agreements.
 - Include whether you have made and have reported on, or are making and reporting on, progress towards achieving the expected results of the agreement in a timely manner. If not, discuss what corrective measures you took, or are taking, and how the corrective measures were effective, documented and communicated.
 - Discuss your history of timely and acceptable reporting, as required by the awarding agency/organization.

- ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (6 points)
 - Compliance with Grant Requirements (3 points)
 - You will be evaluated on:
 - ✓ The extent of compliance with the workplan, schedule, and terms and conditions under the current/prior assistance agreement(s).
 - ✓ The degree to which progress was made (and reported on), or was being made, towards achieving the expected results of the agreement(s) in a timely manner. If expected results were not achieved, the extent to which the measures taken to correct the situation were reasonable and appropriate.
 - A demonstrated history of timely and acceptable reporting, as required by the awarding agency/organization.

- iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements (3 points)
 - You need to affirm that your organization never received any type of federal or non-federal assistance agreement (grant or cooperative agreement). (Applicants that indicate they do not have a history of performing assistance agreements will receive a "neutral" 3-point score. However, failure to indicate anything in response to this subcriterion may result in zero points.)
 - You will be evaluated on the extent to which it is clearly affirmed that
 the organization never received any type of federal or non-federal
 assistance agreement. [These applicants will receive a "neutral"
 score of 3-points.]

- Draft your proposal!
- Use THIS year's guidelines!!
- Contact us with eligibility questions!
- Contact partners for assistance in preparing and/or reviewing your proposal!
- Plan for your public notice and meeting!
- Get new State acknowledgement letter!
- Get a petroleum eligibility letter from your State for petroleum sites!



- Make sure your <u>www.SAM.gov</u> registration in active.
- For www.grants.gov:
 - Register now if you are not already registered.



Regional Courtesy Copy (Requested)

- We request you to send an email (PDF) of your proposal to the EPA Regional Brownfields Contact. For New England:
 - Frank Gardner
 - R1Brownfields@epa.gov
- The Regional courtesy copy is not the official proposal submission.

Grant Guidelines

- FY2019 MAC Proposal Announcement Page
 - Multi-Purpose Guidelines
 - Assessment Guidelines
 - Cleanup Guidelines
- FY2019 Frequently Asked Questions (FAQs)
- ► <u>FY2019 Summary of Changes</u>
- Grants.gov Tip Sheet
- Eligible Planning Activities

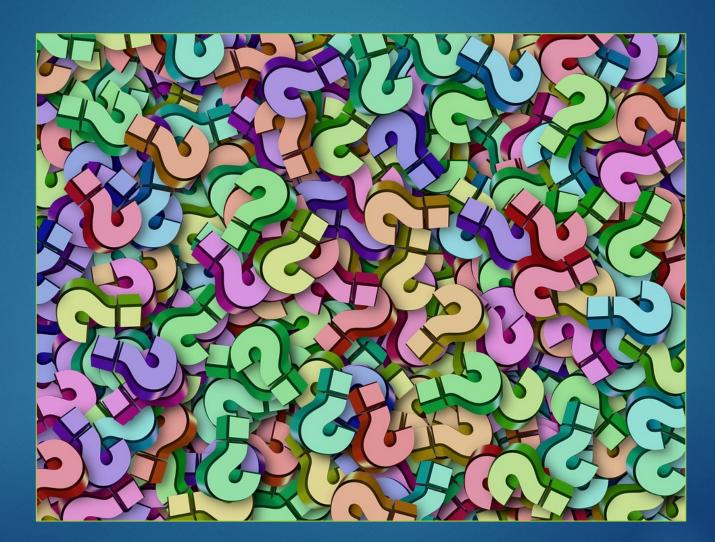


181

- EPA Brownfields Page
- EPA Region 1 Brownfields Page
- NJIT TAB Program
- Build Act Summary
- Cleanups in My Community
- Environmental Data
 - MyEnvironment
 - EPA EnviroAtlas







WYROMMENTAL PROTECTION EPA Region 1 Brownfields