

On October 24th, 2019, EPA Office of Brownfields & Land Revitalization held a webinar to assist applicants with preparing the Fiscal Year 2020 Assessment, Revolving Loan Fund, and Cleanup Grant applications. All questions posed by participants were responded to by an EPA representative. The recorded webinar is available at <https://epawebconferencing.acms.com/pv71tprvnhwt/>.

If you have general program questions or questions about a specific site, please contact your Regional Brownfields Contact list in Section VII. of the Guidelines. If you have specific questions on how to submit an application through www.grants.gov, please visit the grants.gov website for helpful information to guide you through the process, under the "Applicants" tab.

GENERAL QUESTIONS AND ANSWERS

Q: We have 2 specific sites we wish to assess. Would we apply under the site-specific category or community-wide?

A: A Site-specific Assessment Grant is for one (1) site, so you would be looking at a Community-wide Assessment Grant if you'd like to address more than one site.

Q: Can you apply as part of a coalition AND on your own as a specific site or community initiative?

A: No, if you apply as an Assessment Coalition (or as part of an Assessment Coalition), you may not apply for a Community-wide Assessment Grant or Site-specific Assessment Grant. Please see page 5 of the Assessment Grant Guidelines for a summary of available funding options.

Q: If 3 valid entities submit an Assessment Coalition Grant proposal, yet only need \$300,000, would they be better off going community-wide? Are the benefits and contributions of each coalition partner "worth" more by being an official part of a coalition, or can their value be captured as partners to the community-wide applicant?

A: The partners of a coalition are not judged for the grant, only the lead. A coalition does not have to apply for the entire \$600,000 – we encourage all applicants to request the amount of funding that is needed for the project. One benefit of forming a coalition is to serve communities for which your organization does not have jurisdiction. If you apply for and are selected for an Assessment Coalition Grant, you will be required to assess at least one property in each member's jurisdiction and a total of 5 sites. You will have to determine if \$300,000 is enough money to meet the Assessment Coalition Grant requirement, or if it's best to request \$300,000 for a Community-wide Assessment Grant.

Q: Is there a requirement for retaining ownership of site post Assessment Grant completion?

A: There is no requirement for site ownership in Assessment Grants, as a matter of fact, often the purpose of the Phase I Environmental Site Assessment is to provide due diligence for a prospective purchaser.

Q: Can a property be submitted for an assessment grant by an entity that does not own the property - ex. tenant/prospective buyer?

A: An assessment can be conducted on behalf of the property owner (who is not the recipient of the grant). The entity that submits the application must be eligible to receive Brownfields Grant funding (see Section III.A. of the guidelines).

Q: If you apply for Community-wide Assessment Grant for \$300,000 can that all be allocated to hazardous? And do you need to allot the amount to multiple sites? i.e. can you use \$250,000 on one site and \$50,000 on another site?

A: You may apply for up to \$300,000 in hazardous substance funds. Please see the *Task Descriptions, Cost Estimates, and Measuring Progress* criterion on allocating funding to the tasks and activities needed to implement your project.

Q: What is the ideal number of sites if a COG or regional commission is submitting an RLF for a region that includes 75 communities

A: There is no ideal number of sites, however, applicants should consider how many sites they can reasonable can be discussed within the 12-page limit.

Q: Can you still apply for a Cleanup Grant if the subject parcel is not in an Opportunity Zone?

A: Yes. Opportunity Zones are one small factor in the ranking (scoring) criteria, but it is not required in order to apply.

Q: During WWII debris cleanup there was an asbestos dump area left on our village corporation lands by the government contractor. Can we use brownfields funds to clean this area since it is a good location for future housing development?

A: We would need to know more details in order to adequately answer this question. Please contact the regional Brownfields representative for your region. The list of contacts is in Section VII. of the guidelines.

Q: Can a site be used for future commercial use if it was assessed as a green zone site and cleaned that way?

A: The reuse/end use of the site will be determined by city zoning and any restrictions placed on the property/site after cleanup.

Q: Is there a project that is too small to apply for the grant?

A: That really depends on the project, there are several other questions that need to be asked in order to give you an adequate answer. Please contact your regional Brownfields representative; listed in Section VII. of the guidelines.

Q: Applicants should avoid using abbreviations and technical jargon. Is that the case even if you define the abbreviation upon its first use? Will reviewers be reading sections out of order?

A: I think that is fine, however, remember that reviewers may not be as familiar with your terminology and if it is very important, you might spell out several times, where it is really important!

Q: Can color and maps be included in the narrative?

A: Please don't, we discourage it because they don't come out in the final copies and it takes up valuable space.

Q: Would a sub-State organization formed under State statute need to submit support documentation?

A: It depends on what the organization is. If it's has a formal charter that designates it as a unit of government or some other type of eligible entity, then it may be eligible. You should discuss this with your Regional point of contact to determine eligibility.

Q: I keep seeing that letters of support should not be attached, is there a list of what letters of support are acceptable to attach for a Community-wide Assessment grant?

A: Please see Section IV.C. of the guidelines - it's the checklist of information that must be included in your application package.

Q: The published guidelines do not include the 1-inch margins requirement. Was this in error or was the 1-inch margin omitted intentionally?

A: The 1-inch margin is advised to help ensure applicants are not circumventing the page limit.

Q: If an applicant wants to do a "test run" of grants.gov, are they able to send a "dummy application" and submit a final at a later date?

A: **Yes. You can, but please be sure to make clear that the "dummy application" is not what you intend EPA to review.**

Q: What is the order of obtaining Sam.gov and grants.gov accounts. Do I need a Sam.gov account before registering for grants.gov?

A: I'm not sure if it matters, but I suggest obtaining a sam.gov account and then a grants.gov account. Please contact sam.gov and/or grants.gov for an official answer.

Q: How do we find out who is the AOR? Can we login into Sam.gov?

A: **You can contact the grants.gov Help Desk to find out who the AOR is for the organization.**

Q: Should the AOR also be listed under the "Government Business POC" in sam.gov?

A: Please see either Grants.gov or Sam.gov. They will be able to explain this to you answer your question according to what THEY require.

Q: The Summary of Changes on p. 2 states that "the entity's AOR must submit the application". If the grants.gov account is owned by someone else in the entity other than the AOR but is within the same department as the AOR, can that grants.gov account be used to apply for the grant, or must the AOR open his own grants.gov account?

A: The AOR should open his/her own grants.gov account.

THRESHOLD CRITERIA QUESTIONS AND ANSWERS

Q: What division should applicants request the State/Tribal letter from? Your state's Brownfield Program?

A: Yes, your State's brownfields program or the agency that provides environmental oversight for projects.

Assessment Grants

Q: Can you apply for assessment funding on a site that's already had a previous assessment if the assessment was done several years ago?

A: Yes.

Q: Do assessment grant applicants have to publish a notice in the newspaper by 11/19/19?

A: No, that requirement is only for Cleanup Grant applicants.

Q: Does CERCLA only apply to site-specific applicants? Section 3.C in RFA?

A: That's correct! After selection of a community-wide Assessment or RLF grants, EPA will ask for details about the site in question and determine if it's eligible per CERCLA.

RLF Grants

Q: For an RLF grant proposal, are priority sites identified in the proposal required to meet the site-specific criteria for cleanup (owned, Phase II ESA available, etc.)?

A: RLFs are community-wide and you do not have to include any site-specific threshold criteria at the time of application. If selected for funding, EPA will ask you to provide information on each site to determine if it is eligible before expending grant funds.

Cleanup Grants

Q: If a site only received \$200,000 for a cleanup - and they need more? Can they ask for \$150,000 or \$300,000 (because the Cleanup Grants are now \$500,000)?

A: No - sites that have previously received funding through an EPA Brownfields Cleanup Grant are not eligible to receive a new Cleanup Grant.

Q: What was the cut off community engagement date for a Cleanup Grant?

A: The notification ad must be published by Nov 19, 2019. And the community meeting must occur before the application is submitted.

Q: The notification has to be before the meeting and publication BUT the meeting can be after the 19th?

A: The community must be notified in advance of the meeting and no later than Nov 19, 2019. The community meeting must occur after the community notification ad was published and before the application is submitted.

Q: Does the meeting have to be conducted before December 3rd and the meeting notification has to be NLT November 19th, but the actual meeting can be conducted after the 19th but BEFORE the 3rd? Or does the meeting notification and meeting both before November 19th?

A: Yes, the meeting has to be conducted before December 3rd and the meeting notification has to be NLT November 19th. The community meeting must occur after the community notification ad was published and before the application is submitted.

Q: Does the public meeting need to occur before November 19?

A: The notice must be posted no later than 11/19/19, but the meeting itself can occur after that (but before December 3rd).

Q: It is acceptable if the public notification and meeting occurred prior to the guidelines being released. For example, is the notification and meeting requirement per calendar year?

A: The community must have an opportunity to provide feedback on THIS YEAR'S draft application. Therefore, public notification should occur after the guidelines are released since the application could not have been written prior to October 9, 2019.

Q: If you haven't had an assessment completed within one year, you can't apply for Cleanup Grant funds?

A: The timing is related to when you acquired the site. A Phase I Environmental Site Assessment must be completed with one year (and some portions within 6 months) before acquisition. In order to apply for a Cleanup Grant, you must have completed a draft Phase II (two) Environmental Site Assessment and include the date of the report in your response to the Cleanup Grant threshold criteria.

Q: How recent must an environmental site assessment be for a Cleanup Grant? We have some sites that may have been previously assessed.

A: The draft Phase II Environmental Site Assessment does not have a time limit, but if you have concerns about the date, please discuss it with the EPA Brownfields representative in your area – contacts are listed in Section VII. of the Guidelines.

Q: In order to apply for a Cleanup Grant is it required that you had already completed an assessment grant?

A: You will need to have assessed the property/site that you wish to clean up. The source of the funding could have been through an EPA Assessment Grant or some other non-EPA funding.

Q: If a 3-parcel site is owned by a community and the parcels were acquired in 1995, 1998 and 2004 without due diligence and the community didn't cause or exacerbate the contamination, are the three parcels eligible for grant funding?

A: Potentially. Please respond to all of the threshold criteria in Section III. of the guidelines so that EPA can determine if the sites are eligible for funding.

Q: Does a legal document need to be provided to show ownership for a cleanup grant?

A: No, you must, however, describe in detail the circumstance under which the property was acquired.

Q: Will multiple sites require multiple ABCAs?

A: Yes, applicants requesting funding for multiple sites must include a draft ABCA for each site.

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION QUESTIONS AND ANSWERS

Q: Will applicants be penalized if the community does not have an OZ in its jurisdiction?

A: Only because a priority site is located in an Opportunity Zone does not guarantee the response will receive full points. Please focus on providing a good response to the first part of the criterion re: Outcomes and Benefits of the Reuse Strategy.

Q: Do we need to identify all 5 sites from the cost section as a coalition applicant in Section 1 of the narrative under Target Sites?

A: For a robust response, we recommend that you provide information that demonstrates that a site in each coalition member's jurisdiction will be assessed and a minimum of a total of 5 sites.

Q: What's the definition of "near" a body of water in terms of specific distance?

A: The priority site(s) is adjacent to a body of water (i.e., the border of the priority 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).

Q: Are there any grants that can be used for an assessment of brownfield opportunities for solar energy across a geography?

A: Assessment grants can be used to assess properties where renewable energy development is the envisioned reuse.

COMMUNITY NEED AND COMMUNITY ENGAGEMENT QUESTIONS AND ANSWERS

No questions received.

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

Q: For the task description section, what's an example of an activity that's specific to a priority site vs. a non-priority site?
A: Eligible activities can apply to both the priority and non-priority site. EPA is looking to understand which of your sites are a priority and how you will use the funding. Similarly, if you have sites that are NOT a priority, we want to know how you will use the EPA funds.
Q: In order to be eligible for petroleum funding, does the site(s) have to have exclusive petroleum product? For example, for assessment, based on information available, we may assume that petroleum is the main contaminant, but we not be sure, how should this be handled?
A: If you're not sure what the predominant contaminant is, you can use hazardous substances funding. However, if there is a reason to suspect petroleum-related contamination (e.g., old gas station), then you should request petroleum funding.
Q: Is the anticipated schedule of tasks to be put into a table only?
A: No - you can present it in narrative format if you prefer.
Q: The 50% to loans for RLFs includes both loans AND Subgrants?
A: No, only loans. 50% of the budget must be used for tasks associated with executing and issuing loans.
Q: Can you use program income from a closed RLF for match on a new one?
A: Program Income that is a principal loan repayment cannot be used to meet the match/cost share requirement. Program Income derived from other means, such as interest accrued, may be used to meet the cost share. (Answer revised after the webinar)
Q: Can we delete rows in the Budget table (e.g. Equipment) if no funding is being requested for that line?
A: Yes, you can delete the rows.
Q: Should health monitoring and admin costs be included in the cost estimate?
A: Health monitoring cost estimates should be included if you're conducted health monitoring activities. Direct administrative costs should be explained and included in the cost estimates. Indirect administrative costs do not require a full break down - just a statement of your organization's rate as reflected in the budget table.
Q: These cost estimate examples take up a lot of narrative space availability - doesn't seem reasonable.
A: Please do the best you can to provide enough information for EPA to evaluate the response.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE QUESTIONS AND ANSWERS

Q: For coalition assessment grants, do you need to cover programmatic capabilities and past performance of all coalition partners or only the lead applicant?

A: Please only provide a response for the lead organization that is applying for funding.

Q: If we were selected by EPA for a Brownfields Assessment Demonstration Pilot in 2001, would we respond to i. or ii.?

A: Please respond to section i. (Currently Has or Previously Received an EPA Brownfields Grant).

Q: A 128(a) tribal response program counts as a BF grant, correct?

A: Yes, a 128(8) Grant counts as Brownfields Grant under section i. of Past Performance and Accomplishments (Currently Has or Previously Received an EPA Brownfields Grant).