Assessment Work Plan Template 2019

### SAMPLE OUTLINE For your

## BROWNFIELDS ASSESSMENT COOPERATIVE AGREEMENT WORK PLAN

### [Date] [Revision #\_]

### Submitted by: [COOPERATIVE AGREEMENT RECIPIENT ORGANIZATION NAME and ADDRESS]

### [PROJECT MANAGER'S NAME, TELEPHONE NUMBER and EMAIL ADDRESS]

Cooperative Agreement Number: (provided by the U.S. Environmental Protection Agency) A Brownfields cooperative agreement recipient (CAR) must develop a work plan prior to the award of any funds. The purpose of this work plan is for the CAR to describe the tasks necessary to implement the project(s) identified in the proposal submitted in the Fiscal Year (FY) 2019 competition for Brownfields assessment grants. The work plan should be consistent with the outline below; however, the CAR may modify as appropriate to fit the activities identified in its proposal. The EPA project officer will review and work with the CAR to finalize the work plan and the CAR may not expend any funds to carry out the agreement until the EPA approves the final work plan. Activities may be conducted beginning July 1, 2019, if they are eligible activities necessary to implement the project and incurred directly pursuant to negotiation and in anticipation of an award. EPA anticipates the project and budget period to be from October 1, 2019 to September 30, 2022.

#### **TABLE OF CONTENTS**

#### 1.0 PROJECT OVERVIEW

- 1.1 Project Description
- 1.2 Project Team Structure and Responsibilities
- 1.3 Measuring Environmental Results: Outputs and Outcomes
- 1.4 Budget

#### 2.0 PROJECT TASK DESCRIPTIONS

(These descriptions are examples and should be modified as needed for your project.) Task 1 Project Management and Reporting Task 2 Community Involvement/Engagement Task 3 Site Inventory and/or Characterization Task 4 Site-specific Cleanup Planning and Institutional Controls Task 5 Area Planning Additional Tasks (if needed)

3.0 SCHEDULE

#### Attachments

- 1. Budget Table for Work Plan Tasks
- 2. Schedule of Activities and Deliverables
- 3. Example Quarterly Report Template

4.3. Preparing Your Brownfields Community Plan: Involving Your Community

#### **1.0 PROJECT OVERVIEW**

This section should reflect, not repeat, the description in the CAR's proposal that was submitted for the FY19 competition for Brownfields assessment grants. It should describe the CAR's strategy for implementation of the cooperative agreement over the three-year project period and reflects the commitments made in the proposal.

#### 1.1 Project Description

Describe the overall project including the program objectives for the three-year cooperative agreement period. Describe how this grant fits into a broader vision of Brownfields redevelopment in the target community. This information can come from the project description in the grant proposal. Provide background information, a description of the target community, and future development plans. Maps are useful as attachments to the work plan.

#### 1.2 Project Team Structure and Responsibilities

Describe the lead organization managing the project (i.e., if your organization is a regional planning council, describe the governments within its jurisdiction), its organizational structure, and communication flow, and identify roles and responsibilities of all key personnel involved in the implementation of the grant activities. Include any organizational charts if appropriate.

Describe the project oversight and the administrative, financial, technical and legal support that will be used to manage this cooperative agreement. Describe how you will procure, oversee and direct the environmental contractor. Section 2.0. Task 1.E. below, describes the procurement requirements. The CAR is responsible for ensuring the activities are conducted in adherence with the terms and conditions of the cooperative agreement and within the three-year grant period.

Describe how you will involve the State Brownfields or Voluntary Cleanup Program (VCP) official. The cost to enroll in a State Brownfields or VCP is a grant-eligible cost. The CAR will discuss with the State whether they want to receive copies of grant documents and how they will be notified of the site assessment activities. The CAR will provide the State an opportunity to review all technical reports, including Quality Assurance Project Plans (QAPPs), Analysis of Brownfields Cleanup Alternatives (ABCAs), and cleanup plans. The CAR must request State and/or EPA *petroleum* site eligibility determinations for all petroleum sites.

Describe how the project team will meet and the frequency of those meetings; how the terms and conditions of the cooperative agreement will be made available and discussed among the project team; how the cooperative agreement records and files will be maintained; and the CAR's financial management.

#### 1.3 Measuring Environmental Results: Outputs/Outcomes

Describe the expected outputs and outcomes for this agreement. Describe plans for tracking and measuring progress towards achieving the expected short-term and long-term project outputs and outcomes. Tracking attainment of outputs and outcomes through performance measures will help

you manage your project and assure both you and your EPA Project Officer that you have accomplished the purpose of your project. The measures may be listed in bullet form.

Outputs may be quantitative or qualitative and must be measurable during the project period and may include (but are not limited to) the number of number of Phase I and Phase II Environmental Site Assessments (ESAs) and number of community meetings held.

Outcomes may be environmental, behavioral, health-related, or programmatic and will not necessarily be achieved during the project period. Expected outcomes may include but are not limited to the number of jobs and other funding leveraged; the number of acres made ready for reuse or acres of greenspace created for communities; and whether the project will minimize exposure to hazardous substances.

#### 1.4 Budget

The CAR must provide a budget that reflects the work plan narrative and that is consistent with the budget presented in your original grant proposal and in your Standard Form 424A. CARs receiving both hazardous substance and petroleum funding should provide two separate budget tables, or two separate line items within one budget table, which distinguish hazardous substance funds from petroleum funds. Costs for program management salaries, as long as they are included in budget, materials and supplies for public meetings, necessary travel and transportation expenses are allowable programmatic costs. Your cooperative agreement award terms and conditions will have information on eligible costs. See Attachment 1 for an example format for your Budget.

#### 2.0 PROJECT TASK DESCRIPTIONS

The work plan must include a summary of activities that will be conducted by the CAR to meet the project objectives. Required activities include Project Management and Reporting, Community Engagement, and the development of generic and site-specific QAPPs. Other activities include site inventories, Phase I and Phase II ESAs, cleanup planning activities, area planning activities, and the development of Analysis of Brownfields Cleanup Alternatives (ABCAs). This should be inclusive of sites identified in your grant proposal. <u>IF</u> other sites have been identified, list the name, address, owner, and environmental issues. Identify any sites that will require a petroleum determination. The CAR may continue to identify sites throughout the project period for community wide projects. The project tasks should be consistent with the budget.

#### TASK 1 PROJECT MANAGEMENT AND REPORTING

A. Quarterly Reporting: In accordance with EPA regulations 2 CFR Parts 200 and 1500 (specifically, 200.328 *monitoring and reporting program performance*), the CAR agrees to submit quarterly progress reports to the EPA Project Officer within thirty days after each reporting period. Quarterly progress reports will be due 30 days after the end of each federal fiscal quarter, except for the last quarter of the grant project period when a final performance report must be submitted (see Final Performance Reporting below).

CARs may use the Example Quarterly Report Template provided in Attachment 3. The reportsshould be sent electronically to both the EPA Project Officer and, if requested by the State, to the State Brownfields Coordinator. Do not enter these reports into ACRES. These reports cover work status, work progress, difficulties encountered, financial expenditures, preliminary data results, anticipated activities and any changes of key personnel. For community-wide agreements, a quarterly Site-Specific Budget Summary is required in order to ensure that expenditure on a single site does not exceed the \$200,000 statutory limit.

The CAR shall refer to and utilize the Quarterly Reporting function resident within the Assessment, Cleanup and Redevelopment Exchange System (ACRES) to submit quarterly reports.

#### **B.** Annual Reporting:

- Disadvantaged Business Enterprise Reporting: Minority Business Enterprise/Women- owned Business Enterprise (MBE/WBE) reporting is required for CARs whose total budget funds for procurement, equipment, services and supplies exceed \$150,000. Disadvantaged Business Enterprise reporting must be completed annually using EPA Form 5700-52A. These forms must be sent electronically to the EPA Project Officer and your Grant Specialist from the Grants Management Office (GMO). A link to the form is at: <u>https://www.epa.gov/grants/epa-granteeforms</u>. CARs are encouraged to utilize the services of DBEs, where possible. The CAR must submit the form by October 30 of each project year. *Your award agreement will have further details, including the name of the EPA Grants Specialist in GMO that should receive your report.*
- Federal Financial Reports (FFRs): EPA Standard Form 425 must be submitted annually to EPA by January- December 30 of each project year and at the close of the grant. An electronic copy should be sent to the EPA Project Officer and to the EPA Las Vegas Finance Center (LVFC) via email LVFC-grants@epa.gov or fax at 702-798- 2423. A link to the form is at: <u>http://www.epa.gov/ogd/forms/adobe/SF425.pdf.</u>
- 3. **Projections:** With the quarterly report due April 30 of each project year, the CAR will identify the specific sites where Phase I and Phase II ESAs are expected to be completed in the upcoming year. An example of the annual projection reporting format is provided in Table 1 below.

T1: Example Format for Annual Assessment Projections Due April 30			
Site Name	Site Address	Phase I/II ESA to be	Projected Timeframe for
		Completed	Phase I/II Completion
(ex. Maryann's Gas Station)	(ex. 123 Jane Doe St)	(ex. Phase II)	(ex. August 2016)

- C. Final Performance Reporting: In accordance with EPA regulations 2 CFR Parts 200 and 1500 (specifically, 200.328 *monitoring and reporting program performance*), the CAR agrees to submit to the EPA Project Officer within 90 days after the expiration or termination of the approved project period a final technical report and at least one reproducible copy suitable for printing. This report should summarize the accomplishments (outcomes, outputs, and other leveraged resources) during the entire grant project period, including the last quarter. The Final Performance Report should include
- A table listing all the sites assessed during the grant, the deliverables associated with each site, activities conducted at the site, and the funds expended at each site;
- A list of any other deliverables;
- Site photographs; and
- Lessons learned.
- D. ACRES: Property specific information, including the property address and Phase I and II ESA completions, will be entered electronically in EPA's Assessment Cleanup Redevelopment Exchange System (ACRES) database at: <a href="https://cfext.epa.gov/acres/index.cfm">https://cfext.epa.gov/acres/index.cfm</a>. The information in the quarterly report should correlate with the information in ACRES. ACRES is a national database from which site-specific accomplishments are measured by Congress and the public. ACRES must be updated for each property when the following occur:
- Completion of Phase I
- Completion of Phase II
- Completion of the Project Period
- As significant events occur at the site, but not later than the end of the quarter in which the event occurred
- E. Contractor Procurement: Describe how and when contractors will be procured. The CAR is responsible for ensuring all procurement is in accordance with 2 CFR Parts 200 and 1500, ensuring that contractors comply with the terms of their agreements with the CAR, and that agreements between the CAR and contractors comply with the terms and conditions of the cooperative agreement. Procurement is an activity that is eligible as a pre-award activity. The CAR's contractor procurement language should include a provision to track costs site-specifically, such as for site-specific QAPPs and ESAs, and include an overall programmatic task to include costs that would be shared across all sites, such as generic QAPPs.
- F. Reimbursement Request: While there are two methods for payment, EPA's preferred method of payment for CARs is the Automated Standard Application for Payments (ASAP) through the U.S. Department of Treasury. If your organization uses multiple bank accounts for EPA grants/cooperative agreements, you must enroll in ASAP. Once enrolled, grantees can access ASAP at <u>www.asap.gov</u> to request payments. The ASAP payment process is designed to provide federal funds to a recipient organization within 48 hours. The second method is to submit EPA form 190-F-04-001 via fax or email to the

Las Vegas Finance Center—see contact info under Section 2.0, Task 1, B.2., above. This non-ASAP form can be found at: <u>https://www.epa.gov/financial/payment-request-form-grants-and-cooperative-agreements</u>.

**G. Kick-off Meeting:** The CAR project team, contractor, and EPA and State partners should participate in a project kick-off meeting to review the work plan and terms and conditions of the cooperative agreement. This is an opportunity to review roles, responsibilities, and schedule. The EPA Project Officer will review tools and resources that may be useful for you to implement your grant activities.

**H. Travel:** EPA Region 4's Brownfields Program supports the use of grant funding for travel to local, state and national brownfields-related conferences. CARs may identify and budget for educational/training opportunities that enhance its program development. Travel to brownfields state association meetings, conferences or workshops provide valuable opportunities for networking which can lead to capacity building. EPA is aware of the benefits of this type of outreach travel in moving sites toward and achieving revitalization. Costs for necessary travel and transportation expenses, including local trips, are allowable programmatic costs. Please plan to attend the New Grantee workshop and the annual Southeast Regional Brownfields Conferences and any Brownfield Conference or workshop hosted by your state or state brownfields association. in Birmingham, Alabama on September 26-28, 2018.

- I. Administrative Costs: Grant recipients may use up to five percent of the budget on administrative costs. Administrative costs are direct costs, including those in the form of salaries, benefits, contractual costs, supplies, and data processing charges, incurred to comply with most provisions of the Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards contained in 2 CFR 200 and 2 CFR Subpart E.
- **Task 1 will be primarily conducted by**: (CAR should identify who in the project team is responsible for this task)

#### TASK 2 COMMUNITY INVOLVEMENT/ ENGAGEMENT

The CAR is required to develop a **Community Involvement/Engagement Plan** (CEP) describing processes, activities, and planned outreach materials necessary to implement the grant activities. The plan should describe your community and appropriate methods of seeking input, methods of communicating progress and education/information sharing for that particular community. The CEP should be consistent with the activities mentioned in your grant proposal and include the partners and community-based organizations that were identified in your proposal.

EPA encourages the CAR to begin developing the Plan as soon as possible. Development of a CEP is an eligible and appropriate pre-award activity and Attachment 4 is a resource for you to use entitled *Preparing Your Brownfields Community Plan: Involving Your Community*.

Task 2 will primarily be conducted by: (CAR should identify who in the project team is responsible for this task)

#### TASK 3 BROWNFIELDS SITE IDENTIFICATION AND ASSESSMENTS

This section of the work plan should outline the CAR's plans for identifying properties and conducting assessments. This section must detail the strategy for sequencing the work to achieve the Phase I and Phase II targets presented in the proposal. Generally, after community involvement and the development of an inventory, work plan activities will focus on completing Phase I ESAs, followed by Phase II ESAs. The CAR may also conduct site-specific cleanup planning and other eligible activities as needed.

- A. Site Inventory and Prioritization [Community-Wide Only]: Describe the CAR's site inventory and/or site prioritization plan. In order to identify sites for assessment with petroleum funds, CARs should contact the State UST program official to identify the low- priority petroleum sites within its grant jurisdiction. The State contacts can be found at <a href="https://www.epa.gov/ust/underground-storage-tank-ust-contacts">https://www.epa.gov/ust/underground-storage-tank-ust-contacts</a>.
- B. Site Characterization Phase I ESA: The CAR shall ensure that all Phase I site characterizations and assessments conducted with the grant funding be performed in accordance with EPA's standard for all appropriate inquiries. The CAR shall utilize the practices in ASTM standard E1527-13 "Standard Practices for Environmental Site Assessment: Phase I Environmental Site Assessment Process," or EPA's All Appropriate Inquiries Final Rule. The CAR must complete and sign the "All Appropriate Inquiries Rule: Reporting Requirements Checklist for Assessment Grant Recipients", (Publication Number: EPA 560-R-11-030), for each Phase I ESA conducted with Brownfields grant funds. The fact sheet and checklist is Attachment 5 and it also can be found at: <a href="https://www.epa.gov/brownfields/brownfields-all-appropriate-inquiries-rule-reporting-requirements-checklist-assessment.">https://www.epa.gov/brownfields/brownfields-all-appropriate-inquiries-rule-reporting-requirements-checklist-assessment.</a>

**\*New for 2018\*:** EPA would like to emphasize that the Phase I ESA must inventory known or possible sources of polychlorinated biphenyls (PCB)s, and if present such items must to be documented within the report. Large equipment which contain PCBs or the status is unknown, such as capacitors and transformers, which are not in use should be categorized as a REC due to the material threat of a future release to the environment. In the event such equipment is still in use, the environmental professional should make inquiries into its PCB content status with an appropriate site contact. Such inquiries include, but are not limited to, questioning the future use/need for the equipment, the age of the equipment, and the PCB status of the equipment if not stated.

PCBs are presumed to be present when such equipment is older than 1980 and presumed to not contain PCBs if newer than 1980. The Phase I report should contain photographs, including name plates on the equipment if such exist for PCB and possibly PCB containing equipment. For equipment at the facility be categorized as a REC, the environmental professional should evaluate the need to confirm the presence of PCBs during phase II sampling.

When evaluating the history of PCB use, the following databases may provide some site-specific history:

Useful Links: Registered PCB Transformer Database: <u>https://www.epa.gov/sites/production/files/2015-</u> <u>10/documents/most\_recent\_registrations\_excel\_document.xls\_.pdf</u> PCB Activity Database: <u>https://www.epa.gov/sites/production/files/2017-</u> 01/documents/national\_report\_of\_pcb\_activity\_1-18-17.pdf Note: Phase I ESAs have a limited shelf life particularly if the property has near-term cleanup or development plans. The timing of Phase I completion or update may be sensitive and relate to property acquisition. Keep this in mind when developing the overall site strategy.

- C. Site Eligibility: Prior to spending funds for Phase II ESAs for community-wide grants, the CAR must submit a completed EPA Region 4 Site Eligibility Determination Outline (provided by your Project Officer) to the EPA Project Officer and *receive EPA approval*. In addition, for petroleum sites, the CAR must request a petroleum site eligibility determination from its designated State official. Either the state or the EPA must approve the site as eligible for funding before Phase II work begins. If sites are contaminated with both hazardous substances and petroleum, you may want to consult your EPA Project Officer for assistance; however, below are the guidelines for commingled sites:
- A commingled site at which you have reason to believe only *de minimus* petroleum exists must be processed using the hazardous substances eligibility screening only. The CAR is required to charge activities against hazardous funds only.
- A commingled site at which you have reason to believe hazardous and petroleum contamination exist must go through both a hazardous and petroleum eligibility screening. Once the site is deemed eligible, the CAR may charge activities against both categories of funding. A commingled site at which you have reason to believe only *de minimus* hazardous substances exist must go through the petroleum eligibility screening. The CAR is required to charge activities against petroleum funds only.

It is the CAR's responsibility to obtain site access prior to expending any funds on a brownfields site.

- **D.** Site Characterization Phase II ESA: Once EPA has determined the site to be eligible, Phase II ESA activities can begin. Describe the specific activities that will be performed to complete this task.
- Federal Cross-Cutting Requirements: The recipient must comply with Federal cross-cutting requirements. These requirements include but are not limited to OSHA Worker Health & Safety Standard 29 CFR 1910.120; National Historic Preservation Act; Endangered Species Act; and Permits required by Section 404 of the Clean Water Act; Executive Order 11246, Equal Employment Opportunity, and implementing regulations at 41 CFR 60-4; Contract Work Hours and Safety Standards Act, as amended (40 USC § 327-333) the Anti-Kickback Act (40 USC § 276c) and Section 504 of the Rehabilitation Act of 1973 as implemented by Executive Orders 11914 and 11250.
  - 2.Quality Assurance Project Plans (QAPPs): When environmental samples are collected as part of any brownfields cooperative agreement, recipients shall have in place an EPA- or State-approved QAPP prior to sample collection. The QAPPs must be consistent with the the EPA Region 4 QAPP Toolbox. The documents in the Toolbox can be found at <a href="https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box">https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box</a> <a href="https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box">https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box</a> <a href="https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box">https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box</a> <a href="https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box">https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box</a> <a href="https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box">https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box</a> <a href="https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box">https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box</a> <a href="https://www.epa.gov/brownfields-funded-Projects-plan-qapt-to-box">https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box</a> <a href="https://www.epa.gov/brownfields-funded-Projects-plan-qapt-to-box">https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box</a> <a href="https://www.epa.gov/brownfields-funded-Projects-plan-qapt-to-box">https://www.epa.gov/brownfields-funded-Projects-plan-qapt-to-box</a> <a href="https://www.epa.gov/brownfields-funded-Projects-plan-qapt-to-box">https://www.epa.gov/brownfields-funded-P

requirements for the assessment of lead based paint and asbestos. See the QAPP guidance for more information.

3. **Health & Safety Plans:** The CAR must also prepare and follow an OSHA-compliant Health and Safety Plan (HASP), and place a copy in the Cooperative Agreement file. CARs must also submit these to EPA and the State for the Brownfields project file. EPA approval of the HASP is not required.

Task 3 will primarily be conducted by: (CAR should identify who in the project team is responsible for this task)

#### TASK 4SITE-SPECIFIC CLEANUP PLANNING AND INSTITUTIONAL CONTROLS

This section of the work plan should outline the CAR's plans for cleanup planning and identifying any institutional controls that may be needed. CARs may elect to use assessment grant funds to evaluate and select appropriate remediation strategies. An ABCA or equivalent State-required document describes the findings of the assessment phases, and presents an evaluation of cleanup alternatives. Review by the State Brownfields or VCP project manager will help ensure that your cleanup plans will ultimately be acceptable to the State. Consult with your State representative for any other elements they may require. The ABCA is also a useful communication tool for obtaining public input on the cleanup.

- ABCA: An ABCA briefly summarizes information about the site and contamination issues, cleanup standards, applicable laws, cleanup alternatives considered, and the proposed cleanup. It should include information on the cleanup effectiveness, the ability of the grantee to implement each alternative, the cost of each proposed cleanup alternative and an analysis of the reasonableness of the various cleanup alternatives considered including the one chosen. Further details on the elements of an ABCA can be found in our Frequently Asked Questions (FAQs) for FY 2016 Brownfields Assessment and Cleanup Grants at: <u>https://www.epa.gov/sites/production/files/2015-10/documents/fy16\_faqs.pdf</u> Your EPA Project Officer can also provide an example of an ABCA.
- 2. **Institutional controls (ICs):** ICs are administrative or legal mechanisms that help minimize the potential for human exposure to contamination or protect the integrity of a remedy. While it is EPA's desire to see every site cleaned up to a level that allows for unlimited use and unrestricted exposure, it may not be practical. Zoning changes, easements, etc. generally require both State and local mechanisms and approvals. Property transfers and/or property development often cannot occur until these controls are in place. Anticipate multiple IC jurisdictions and the associated timing requirements in your cleanup planning schedule. Work closely with the State for the approvals.

Note: Only sites owned by local governments or non-profits may apply for EPA cleanup funds; however, cleanup planning done under the assessment grant may be done at any site.

Useful link: http://www.epa.gov/brownfields/tools/tti lucs.htm.

# **Task 4 will primarily be conducted by**: (CAR should identify who in the project team is responsible for this task)

#### TASK 5 AREA PLANNING

Within a well-defined, size appropriate target area, and with consideration of one or more specific catalyst brownfield sites, it may be important to consider area planning for a broader context to site-specific Brownfields Cleanup Planning (Task 4). This may include such considerations as Brownfields economic research and market analysis, assess adequacy of city ordinances, assessment of infrastructure improvements needed to support the Brownfield area revitalization, coordination and alignment with other planning efforts, or other considerations. Additional ideas are available from EPA's Brownfields Area-Wide Planning Grant publications.

Useful link: <u>https://www.epa.gov/sites/production/files/2015-</u>09/documents/epa\_oblr\_awp\_summary\_v4\_508.pdf also,

Useful link: https://www.epa.gov/sites/production/files/2015-05/documents/fresno final report 042215 508 final.pdf

Describing the task in the workplan requires explaining size appropriateness and target area. This grant is not intended, nor is it adequate to substitute for strategic planning for an entire community. Further, it may require expertise not well suited to the QEP retained for the assessment work. Additional contract or subcontract work for this task must be competitively procured, either with or separately from the procurement of the QEP. Don't overlook the many experienced, sometimes non-profit organizations that support community planning efforts.

This task must result in a well-defined plan as a deliverable. That plan may define, specific strategies for Brownfield assessments and cleanup/reuse plans moving forward from this grant, related improvements and investments necessary to advance sustainable and equitable revitalization within the well-defined project area, resources needed, partnerships and leveraging opportunities. It should also include any market-based studies or economic analysis used to help guide redevelopment strategies.

# Modify with other eligible work plan tasks as needed, especially those identified in your assessment grant proposal.

#### 3.0 SCHEDULE

Attachment 2 provides an example table with a detailed guideline for schedule development. Several tasks run concurrently so you may choose to use a Gantt chart or other scheduling software tool that can assist in scheduling. Be sure to include sufficient time for management or governing board approvals as may be necessary at critical points in the project. Schedule development should be discussed with the EPA Project Officer.

### Attachment 1 Budget Table for Work Plan Tasks

Present your budget and ensure it is consistent with Standard Form 424A, the budget justification worksheet, and your work plan tasks. CARs receiving both hazardous substance and petroleum funding should provide two separate budget tables, or two separate line items within one budget table which distinguish hazardous substance funds from petroleum funds. If personnel costs are part of the approved budget, the level of effort related to the tasks should be described in the work plan. Your EPA Project Officer can assist you with questions on eligible activities and costs. This is an example budget table below and the CAR may have different project tasks.

Budget Categories	Project Tasks					
(Programmatic costs only)	Task 1 Project Management and Reporting	Task 2 Community Involvement/ Engagement	Task 3 Brownfields Site Identification and Assessments	Task 4 Cleanup Planning	Task 5 Area Planning	Total
Personnel						
Fringe Benefits						
Travel <sup>1</sup>						
Equipment <sup>2</sup>						
Supplies						
Contractual <sup>3</sup>						
Other – specify						
Total						

<sup>1</sup>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.

<sup>3</sup> The CAR must comply with the procurement procedures contained in 2 CFR 200 and/or 1500.

### Attachment 2 Schedule of Activities and Deliverables

The CAR should use this format for planning their grant activities, but can make modifications as needed appropriate for the project. Consider starting Phase I activities as soon as sites are identified (do not wait for a final site inventory). Conduct community engagement activities throughout the three years. Projects with at least 35% of the funds expended on eligible tasks after 18 months are well positioned to spend all funds by the end of the project period.

	Time and Actions from Notice of Selection to Award				
	0 (1				
Pre-Award	0 month	Notice of Selection: May 2018			
	0-2 months	CAR completes required grant award documents and submits to EPA			
	2 months	EPA works with CAR to finalize grant work plan by Jun-Jul 2018			
	2-4 months	CAR may conduct pre-award activities such as drafting the Community Engagement Plan			
	2.4	and issuing consultant RFP			
Р	3-4 months	EPA executes grant award			
	Time and Actions from Award/Project Start to Project End				
	0 months	Grant award			
	0-3 months	RFP for contractor procurement is finalized (if not completed pre-award) ACRES Training			
	1-4 months	Consultant contract executed and contractor on-board			
		Kick-off meeting held with Contractor, EPA, State and others on the Project Team			
		Complete Community Engagement Plan			
		Plan First Public Meeting			
		Start regular conference call meetings with Project Team			
	4 months	Quarterly Report 1 is due 30 days after 1 <sup>st</sup> quarter ends			
		Reimbursement Request Submitted			
		ACRES Entries			
	4 – 8 months	Develop generic QAPP and submit to EPA/State for approval			
1		Conduct Site Inventory and Prioritization Conduct Limited Site Characterization			
Year 1		Host Public Meeting			
Ye	7 – 8 months	Start Phase I ESA(s)			
		Convene regular conference call meetings with Project Team			
	7 months	Quarterly Report 2 is due 30 days after 2 <sup>nd</sup> quarter ends			
		Reimbursement Request Submitted			
	10 months	Quarterly Report 3 is due 30 days after 3 <sup>rd</sup> quarter ends			
		Reimbursement Request Submitted.			
	8-12 months	Complete Phase 1 ESAs			
		Enter Phase I ESA information in ACRES			
		Submit signed AAI checklist to EPA			
		Submit Site Eligibility Determination forms to EPA			
		Develop site-specific QAPP and submit to EPA/State for approval			
		Start Phase II ESAs			
	12 months	Submit Federal Financial Report (SF425)			
	13 months	Quarterly Report 4 is due 30 days after 4 <sup>th</sup> quarter ends			
		Reimbursement Request Submitted			
		Disadvantaged Business Enterprise (DBE) due with this quarterly report			
	16 months	Quarterly Report 5 is due 30 days after 5 <sup>th</sup> quarter ends			
Year 2		Reimbursement Request Submitted			
eal	18 months	Half of 3 year grant is complete. Check-in with EPA/State for any modifications to			
Υ		work plan budget or scope of work.			
		Make sure accomplishments to date are in ACRES.			

		Make sure all drawdowns possible have been made. 35% of funds should be expended			
		by this time.			
	19 months	Quarterly Report 6 is due 30 days after 6 <sup>th</sup> quarter ends			
		Reimbursement Request Submitted			
		DBE due with this quarterly report			
	22 months	Quarterly Report 7 is due 30 days after 7th quarter ends			
		Reimbursement Request Submitted			
		Participate in regularly scheduled planning/status calls with Project Team			
Ongo	Ongoing Conduct and build on Community Engagement activities				
		Identify financial commitments, developers, cleanup planning activities, etc.			
	25 months	Quarterly Report 8 is due October 30, 2017			
		Reimbursement Request Submitted.			
		DBE due with this quarterly report			
	28 months	Quarterly Report 9 is due 30 days after 9th quarter ends			
		Reimbursement Request Submitted			
	30 months	Six months remain on the grant; Identify any remaining activities that should be completed			
		prior to grant closing			
ut	31 months	Quarterly Report 10 is due 30 days after 10 <sup>th</sup> quarter ends			
seo		Reimbursement Request Submitted.			
clo	34 months	Quarterly Report 11 is due 30 days after 11 <sup>th</sup> quarter ends			
pu		Reimbursement Request Submitted			
ar	Prior to close-	Enter all work in ACRES;			
r 3	out	Prepare and Submit final Phase I or II ESA Reports and draft ABCAs.			
Year 3 and closeout	35 months	Reconcile accounts; collect remaining invoices for submission; gather deliverables for			
		final close-out report			
	36 months	Grant project/budget period closes; no further costs can be incurred after final date			
	37 months	Quarterly Report 12 is due 30 days after 12 <sup>th</sup> quarter ends; May serve as Final Close-out			
		Report if all project documentation is complete and ready. If so, then it is due 90 days			
		after project period ends.			
		MBE/WBE/DBE report due with this quarterly report.			

### Attachment 34

### Preparing Your Brownfields Community Plan: Involving Your Community

This is the suggested format the CAR can use to provide your EPA Project Officer with your quarterly report. Include property names and other details in the appropriate task description of accomplishments. Be descriptive with your reporting.



Page

# Preparing Your Brownfields Community Plan: Involving Your Community

# **Introduction**

The Environmental Protection Agency (EPA) Region 4 Brownfields program has prepared this information to assist Brownfield Grantees and/or their consultants in developing a Community Involvement Plan (CIP). <u>This is not intended to be a template</u>. EPA requires applicants to describe their plans for involving community members and community-based organizations in the site cleanup and reuse decisions. Involving the community and soliciting feedback regarding Brownfields activities and redevelopment plans are essential to a community Brownfields program's success.

This overview does not constitute a rulemaking by EPA.

## **General Overview**

"EPA is committed to community involvement; all citizens play key roles in the success of Brownfields Grants." -Cindy Nolan, EPA Region 4 Brownfields Section Chief

- The (CIP) will describe the Grantee's strategies to inform and motivate local communities for meaningful involvement throughout the project. The CIP should be an evolving document and is most effective when it is updated or revised as your project conditions change.
- A CIP is an effective tool for managing community involvement activities, which involves communicating with citizens, community organizations, and other key stakeholders affected by the project. The CIP will define the roles of the grant recipient, State and Federal representatives, and/ or consultants. The CIP will also help the public understand ways in which they can participate in the decision-making process.
- The level of public involvement will vary from project to project. At a minimum, your plan should demonstrate a commitment to and strategy for two-way communication with people living or

2

- working near the Brownfields site(s) and/or project area. The CIP should discuss what outreach activities will be implemented, and may include a timeline indicating when community outreach activities will occur. Activities may include public meetings, Brownfields 101 workshops, and site visits. The CIP may also discuss the establishment of community groups (e.g. Citizen Steering Committee, Citizens Advisory Board or a similarly-titled group) which can represent a larger community's position and provide input on project decisions from an overall community prospective. Ideally, the Grantee should seek input from all potentially impacted parties and stakeholders.
- The CIP should be one of the first deliverables under a Brownfields grant, as it defines the project area, and details the early steps that will be taken to provide general Brownfields education and site-specific information to the community. EPA Region 4 expects that most Grantees have already taken steps to involve or communicate with their constituents, as this is a key ranking criteria of the grant guidelines. Interested members of the community may have little-to-no knowledge of the full project, but they may have valuable information on the background and history of the community. A critical first step in establishing a meaningful dialogue is providing the community with project background information (such as general Brownfields project goals, and what project-specific decisions have already been made) to help individuals identify issues that are relevant and important to them. Community representatives need this background information in order to be fully involved in the decision-making process. If your program is large, it may be appropriate to set up subgroups to focus on individual topics.
- The ultimate goal is to keep citizens informed and involved so that they remain aware of potential concerns, questions, and solutions. Communication is a two-way process: grant recipients need to provide information to the community, and the community needs to provide information and feedback in return. This informational is intended to help facilitate and open those lines of communication.
- **Note:** Developers and investors are attracted to areas with strong community pride, support and interest, and appreciate predictability. Knowing the Grantees' and community's concerns and expectations early in the plan process helps eliminate surprises that could derail a project.

### **Building Your Plan's Foundation**

EPA Region 4 encourages Grantees to increase their community awareness prior to writing a Community Involvement Plan by conducting a community assessment. Most Grantees have performed a community assessment before writing their Brownfields Grant Application and/or before the award of their Brownfields Grant. Before getting started writing the CIP, you should know the answers to the following:

Who is the Community? What

are the Demographics? Are

there language barriers?

Who are the community leaders?

Are there key community or neighborhood organizations?

Have you defined the project area, geographic boundaries, and history? What

are the community's needs and concerns?

Are there other concerns such as healthcare, crime, access to healthy food or other concerns? How

will you find out what the community's needs and concerns are?

What level of understanding does the community have about Brownfields?

If the community does not understand Brownfields will you conduct a Brownfields 101? Is

the community concerned about any particular sites or properties?

- How does and will the community get information? word of mouth? radio, newspapers, television, church, web sites, social media, etc.
- Are Public Meetings an effective way to communicate with the affected community? What are the potential locations for the public meetings and availability?
- What capabilities does the grantee have to deliver information? What methods are effective in your community?

4

- What outcomes does the community want to see? Or does the community need to develop a vision? What does the community NOT want to see happen?
- How will the community be involved in the site inventory, prioritization and/or the site selection?

### **Building Your Plan**

- Regarding the format, the cover page should identify the CIP as an EPA document with the Brownfields Grant number. Although the CIP is project specific, it should not be about the project. Rather, the CIP should be about how you will involve the community in the project process. It should also be issue specific in that it should identify the community's issues, needs and concerns.
- After identifying community concerns, the CIP should identify specific activities, outreach products, or programs that you will use to address the concerns. In general, at a minimum, the content of the CIP should include:

Overview of the CIP Project

Description

Community Involvement Plan Objectives

Community Involvement Activities and Timing (including your communication strategy) Site(s)

selection process, description, and documentation

Contact List

Location of the Information Repository

Location for Public Meetings

Media Contacts

Glossary of Terms

List of Acronyms

Established Title of Community Group(s), and Map(s)/Figure(s) of

site(s)

## **Community Involvement Plan**

### **SECTION 1**

### **Overview of the Community Involvement Plan**

- Describe how the Community Involvement Plan (CIP) will identify issues of concern and interest to the community potentially affected by the project. How will the Grantee use the information in this CIP to help identify and address current matters of concern, and to review past community involvement efforts as the project progresses. Explain how the CIP will also provide guidance to the Grantee and help to ensure that community needs are addressed throughout the Brownfields project process.
- What is the CIP intended to do? Will the CIP encourage community interest and participation throughout the Brownfields project at the site(s)? How will the Grantee initiate and support two•way communication between Grantee and the community? Would an educational session be beneficial to help ensure that community members understand the Brownfields process, and the opportunities it offers them to participate in the decision•making process regarding the site cleanup?
- **Note:** If the grantee has already identified issues or concerns (either from institutional knowledge, community interviews, or conversations with other interested parties and regulatory authorities), then discuss them here. Whether or not issues have been identified, discuss your plan for soliciting community input (more detail will be included in Section 2). Also include information about the target community. This should be defined in the Brownfields grant application (proposal). You may wish to include the demographics table from your proposal, if it provides useful information for developing the CIP.

### **SECTION 2**

### **Project Description and Definition of Project Area**

Include a discussion of the grant type, project area (e.g., a specific site, a neighborhood, city-wide, county-wide, etc.), time frame (typically three years), and envisioned outcomes, if applicable.

#### **Community Involvement Plan Objectives**

- Include in this section what your objectives are for the CIP throughout the investigation and/or cleanup project. You will need to keep community members informed and involved in the assessment and/or cleanup process.
- **TIP:** The CIP is intended to provide general Brownfields program information to interested community members, as well as help them identify the participation opportunities and options available to them throughout the project. Objectives may include: providing timely, project specific information to community members so that they are able to participate in, or closely follow, project related activities to the maximum extent they desire and the process allows; providing opportunities for community input that are tailored to the needs and concerns of the community; helping ensure that community members are well informed, so that they are knowledgeable about site activities and the Brownfields process; enhancing communications between Grantee and the media to help ensure reporters are provided timely information about site related activities and events and are aware of site related pertinent topics.

### **SECTION 3**

#### **Community Involvement Activities**

- **Tip:** Actual methods and procedures will be based on the level of community interest, identified community issues and concerns, and the complexity and duration of the project's investigation and/ or cleanup. The level of participation sought by communities or individual community members varies.
- This is an overview of your "action plan" for the CIP. Describe or list the planned outreach and community involvement activities. Describe or list how you will gather community information (e.g., interviews, visioning sessions, listening sessions, hold meetings, partner with specific organizations/leaders, etc.)

7

- **Tip:** The community stakeholders may have important information to provide in reuse and/or revitalization for your Brownfields project. By performing your outlined activities, the Grantee can help ensure that community members know about the Brownfields process and the actions taking place concerning the project, and that they are aware of the opportunities for the community to participate in project•related decisions. By providing accurate information about the project investigation, the Grantee will enable interested parties to make recommendations regarding the project that are appropriate for their community.
- **Note:** The following methods are commonly used as community outreach tools. You may wish to use some or all for your project, or you may have other methods that are not listed below. Include a rationale for why you are using these methods.

Assign a Point of Contact

Provide name and contact information for project point of contact. Include address, telephone number, and email information. Describe the point of contact's role. Is the point of contact providing a direct link between the Grantee and the community? How will the point of contact prepare and distribute project related information, including public meetings, data and documents to residents, local officials, local media and interested parties? Will the point of contact provide language translation at the meetings and for any written material? Will the point of contact be responsible for revising or updating the CIP?

Prepare and distribute information to residents and interested parties.

Some Grantees have used fact sheets (also referred to as community updates or newsletters) which are useful when communicating with large groups of people about topics of common interest. For example, fact sheets are helpful for explaining specific events and issues, discussing and dispelling rumors, explaining relevant scientific or technological data, or informing interested parties about progress or problems related to the site(s) or the schedule of work.

Develop and maintain a mailing (and contact) list.

Mailing (and contact) lists are developed and maintained to facilitate distribution of materials, such as fact sheets and meeting notices, to interested and potentially affected community members. The lists also provides a quick reference to key community members, such as local officials and community group leaders. Residents, local businesses, elected officials, and the media are routinely included on mailing and contact lists. Community surveys and local tax maps

8

form the basis of most mailing lists, but the lists are revised to include those who request to be added (or deleted) and those who provide their names and addresses on meeting and event sign in sheets. The Grantee should make every effort to protect the privacy of community residents, which includes denying requests to share personal information, such as names, addresses and individual residential sampling results, with non•government persons. The mailing list will be periodically updated and revised, if necessary, throughout the course of the Brownfields project

Make project related information, including data and documents, available to community members locally.

The grant Terms and Conditions require establishment of an information repository. The Grantee should make project related information available to local residents at easily accessible locations, such as a local library or municipal building. The available information may be in any one of several forms, including paper copies, online (via the Internet), or CD• ROM, electronic copies depending on the capabilities and preferences of the local host facility. The information made available will include project related documents. Specify the name of the local library or municipal building, include how it was established as the local information repository host, and how it will maintain a project file for public review.

Keep local officials well informed about project activities and developments.

By keeping local officials abreast of the work schedule and project related developments, the Grantee can promote a collaborative relationship to help ensure that officials are able to respond knowledgeably to citizens' inquiries. When local officials are well informed, they can enhance the flow of accurate information between the Grantee and concerned community members.

Keep local media well informed about project activities.

By distributing timely and accurate information to the local media, the Grantee can minimize misinformation and speculation about site related activities. News releases, written materials, and direct phone calls are all appropriate ways to provide information to media representatives. The media should always be notified of public meetings and similar events, and may be offered opportunities to participate in news briefings or conduct interviews with the Grantee. Upon request, or when circumstances warrant, special information sessions or news conferences can be useful to ensure that complex situations

9

are understood and can be accurately conveyed to the public. Every effort will be made to address media inquiries quickly.

Conduct Public Meetings and/or Public Availability sessions

When conducted, Public Meetings should be held at a convenient location during evening hours so that most interested parties will be able to attend. Public Availability Sessions are less structured than meetings. Generally, there are no formal presentations. Instead, community members are invited to come at their convenience within the set time frames, and talk one on one with the Grantee and others associated with the site cleanup activities. Public Availability Sessions may include afternoon and evening hours so that interested parties can attend at their convenience.

Place Public Information sometimes known as Public Notices in local publications

Public Notices regarding required and elective activities can be selectively placed the newspapers. To ensure the widest possible exposure, Public Notices about Brownfields activities are often run as retail display ads, rather than in the classified or legal notice sections. Public Notices announce important project related developments, Public Meetings and Availability Sessions, the release of project related documents, or any other information of importance to the community at large.

Provide support for Community Groups

Community Groups are community-led groups that are intended to represent and include all interested members of the community, including other interested representatives. By meeting regularly to discuss the site related activities and the community's issues and concerns, this often helps to keep the community informed and involved in the process. These groups can also provide valuable information to local governments concerning the future use of properties and the communities' collective long term goals. Although these groups are not funded in the Brownfields Grant, the Grantee can assist interested community members in forming groups and provide support services to the groups, such as assistance with production and mailing of newsletters they may develop.

Language Translation

Describe any language translations that will be provided at meetings and for printed information (if necessary).



Revise Community Involvement Plan as Needed

It is important that the CIP is periodically updated to reflect changing concerns of the community as Brownfields related activities progress. The CIP contact list should be revised whenever elections result in a change in elected officials, or when personnel changes affect non• elected official contacts.

Community Involvement Activities to Date

**TIP:** <u>Example below: Include in a table format the community</u> <u>involvement meetings and other activities</u>

D	ate	Event	Representatives

### **SECTION 4**

### **Site or Sites Selection Inventory Process**

Describe how the community was involved or will be involved in the site or sites inventory process. Describe site or sites history and actions to date.

#### Site or Sites Description

Describe the site location or sites locations with intersections, if applicable. Also describe the site and adjoining properties. A map of the site(s) and surrounding area showing streets, homes, businesses, and geographic features may also be provided on a separate page or fold -out.

#### **Site or Sites Documentation**

Provide location of project documents by establishing an Administrative Record (all project records must be made available to the public at a repository local to the project, during normal working hours, throughout the duration of the project). Also include a list of the documents that will be made available for public review (e.g., Phase I and Phase II reports, decision documents, public notices, summary of responses to public comments, and other supporting documents.)

#### Page

# **APPENDIX** A

### **List of Contacts**

### A.1 Federal Elected Officials

Include United States Senators and

Include United States House of Representatives for the Congressional district(s) in which the project is located

### A.2 State Elected Officials

Include Governor

Include State Senators and

State House of Representative member(s) for the District(s) which the project is located

### A.3 Local Officials

List here

### A.4 EPA Region 4 Officials

List here

Other relevant federal agency officials if applicable

### A.5 State Environmental Agency Officials

Include here

### A.6 Media

List Newspapers Name(s) here List

Television Stations here List

Radio Stations here

List other media here such as social media (Twitter or Facebook, etc.)

# **Appendix B**

### **Information Repositories and Potential Meeting Location**

### **B.1** Library or other location(s)

List Here

### **B.2** Potential Public Meeting Location

List Here

# Appendix C

### C.1 Glossary of Terms

List Here

Page

Page 14

Date: January. 2013

# **Appendix D**

# **D.1 List of Acronyms**

List Here

# **Appendix E**

# E.1 Community Group Name

List Here

# Appendix F

# F.1 Maps of site(s)

Include Here

Assessment Work Plan Template 2019