

**BROWNFIELD ASSESSMENT
COOPERATIVE AGREEMENT DRAFT WORK PLAN**

FOR

The City of Orlando, Florida
Community-Wide Brownfields Assessment Grant
For Hazardous and Petroleum Products Project

June 21, 2012
(revised October 1, 2013)

Submitted by:
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Economic Development Department
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Cooperative Agreement Number: BF95498212

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1.0 PROJECT OVERVIEW

- **Project Description**

The City of Orlando (City) requested \$400,000 in assessment funding to provide support in the City's efforts to perform community-wide hazardous substance and petroleum assessments on multiple brownfields located within the historic Parramore neighborhood, a predominately African-American low-moderate income community. The requested funding will support economic development projects generating living-wage and high-wage jobs, community development projects including affordable and workforce housing, recreational projects and other community-driven projects in the Parramore Community. One of these projects, the Creative Village redevelopment, is currently underway.

The 68-acre Creative Village project involves the replacement of aging and obsolete public infrastructure to create a live, work, learn and play mixed-use community built around a foundation of technology-based employment and educational opportunities, mixed-income and attainable housing, neighborhood commercial and public open spaces. The technology-based employment and educational opportunities at Creative Village will help expand greater Orlando's economic cluster of tech-based, digital media production, modeling and simulation industries.

Job creation analyses project over 4,800 permanent jobs at full build-out. The City estimates the redevelopment efforts will result in a substantial increase to its tax base. At completion, it is anticipated that the Creative Village project will result in a high-quality, new urban neighborhood to support a diverse and dynamic mix of uses, including 900,000 – 1,000,000 square feet of office space, 300,000 – 500,000 square feet of higher education space, 25,000 square feet of K-12 education space, 1,200 – 1,500 affordable residential units, 125,000 – 150,000 square feet of retail space, 150-200 hotel rooms and six parks providing public space for hosting civic events, festivals and community markets. The City is confident that the Creative Village redevelopment will serve as an economic catalyst and result in the improvement of environmental quality in one of its oldest, most historic communities, making it more sustainable and attractive to future developments of equal caliber.

To support this effort, the City plans to conduct extensive public outreach and community involvement to area residents, businesses and other stakeholders.

Key to the success of this project is a public-private partnership which includes the Banc of America Community Development Corporation, the nation's largest community development corporation among financial institutions, and Ustler Development, a pioneering and highly successful Orlando-based developer, to partner in this development. This development team includes a highly qualified team of experts and includes brownfield assessment and remediation work.

The City anticipates a three-year time frame in which to complete the assessment portion of its brownfields program. The City plans to accomplish the following over the three year time period of this award:

- A complete inventory of regulatory sites within Parramore,
 - Public Health Monitoring Plan,
 - 20 Phase I Environmental Site Assessments (ESAs),
 - 1 Generic Quality Assurance Project Plan (QAPP),
 - 8 Site-Specific QAPPs,
 - 8 Phase II Assessments, and
 - 4 Analyses of Brownfield Cleanup Alternatives (ABCAs).

The City will track outcome and output measures in the EPA Assessment, Cleanup and Redevelopment Exchange System (**ACRES**) database for progress in achieving the expected outcomes on a quarterly and cumulative basis.

Program Objectives

1. Complete an inventory of regulatory listed sites within the Parramore community,
2. Complete a Public Health Monitoring Plan,
3. Complete 1 Generic QAPP,
4. Perform 20 Phase I ESAs,
5. Complete 8 Site-Specific QAPPs,
6. Perform 8 Phase II ESAs, and
7. Complete 4 ABCAs.

Program Outcomes

1. Environmental conditions within the community are evaluated,
2. Environmental risks associated with brownfields are understood by community members,
3. Assessment of environmental conditions is completed on sites within the community,
4. Assessed properties are ready for cleanup and/or redevelopment,
5. Environmental Justice is implemented in the target community.

• **Project Team Structure and Responsibilities**

The City has the technical and legal support needed to execute this cooperative agreement, oversee and direct the contractor(s). The City may also coordinate with the Orange County Health Department on health issues as warranted.

The City will provide project updates to the Florida Department of Environmental Protection (FDEP) Brownfields Redevelopment Program contact on a regular basis – FDEP Central District, George Houston II, P.G., Brownfields Coordinator, 3319 Mcguire Blvd., Suite 232, Orlando, Florida 3280.-3767, Phone: 407.897.4322, Fax: 850.412.0465, Email: George.houston@dep.state.fl.us.

Where applicable, the City will make FDEP aware of all site-specific assessment activities to be initiated and will provide FDEP an opportunity to review and comment on all technical reports, including QAPPS, sampling plans, ABCAs, cleanup plans, and other technical reports. Where applicable, FDEP will be specifically notified for Phase II activities, and will be involved in any site eligibility determinations for community-wide grants.

Team members will include Mr. Dean Grandin (Orlando’s Planning Official and City Planning Division Manager) as Brownfields Director, Mary Stewart-Droege (City Planner) as Brownfields Coordinator, the City’s selected consultant, and others as appropriate.

Dean Grandin has been working for the City of Orlando for over a decade, and currently serves as the Planning Official and City Planning Division Manager within the Economic Development Department. Dean brings thirty-five years of professional planning experience to the City. Prior to Orlando, he held the position of Planning Director/Deputy Director of Development for the City of Miami Beach, Florida. Before that he was the Planning Director/Deputy Director of Development for the City of Yonkers, New York. Dean’s professional affiliations include, but are not limited to, membership in the American Institute of Certified Planners (AICP), the American Planning Association (APA) and the

Florida Chapter of the APA, the National Trust for Historic Preservation, the Congress for the New Urbanism and the Urban Land Institute. He has held many other professional affiliations throughout his career and currently serves as the Chairman of the UCF Planning Advisory Board. He has served as the City's past Brownfield Advisory Board Liaison and is intimately familiar with the technical, environmental and social aspects of brownfield redevelopment.

Mary Stewart-Droege has been a planner for over 10 years with the City of Orlando. Ms. Droege has a background in health and federal funds administration as it relates to community redevelopment and is a true champion of the Brownfields Program and Creative Village redevelopment project. Possessing both LEED-AP and AICP certifications, she is also the Physical Environment and Policy Committee Chairperson for Get Active Orlando (GAO), a successful and innovative City initiative which serves to implement policies and practices that will strengthen community capacity to support healthy lifestyle behavior.

The Brownfields team will work closely together and on a continual basis throughout the grant period meeting at least monthly initially to discuss strategies, plans, and results of Orlando's Brownfields Program.

- **Kick-off Meeting**

The Orlando Brownfields Project team, EPA and State partners will have an on-site project kick-off meeting to orient all the partners to project expectations upon final award. Roles and responsibilities, as well as project schedules, will be reviewed at this kick-off meeting. Further, Cooperative Agreement Terms and Conditions will be distributed to each team member and discussed at this meeting.

2.0 PROJECT TASK DESCRIPTIONS

TASK 1 SITE INVENTORY AND/OR CHARACTERIZATION

A. Inventory of Regulatory Listed Sites. The City will utilize environmental database searches of potential hazardous substance and petroleum product sites within the project area(s). This research will establish the number/type of potential hazardous substance and petroleum product brownfield sites within the project area(s). This task will assist stakeholders in determining which properties should be targeted for Phase I, Phase II and additional site assessment activities. This inventory will set a baseline of regulatory-listed hazardous substance and petroleum product sites within Orlando than can be measured during the development and implementation of their Brownfields Program. This task is a critical part of their community involvement and outreach/education program to be developed under this grant; the City will seek input from community-based organizations on potential brownfield sites for redevelopment.

TASK 2 PHASE I & II SITE ASSESSMENTS

A. Candidate Site Identification. Orlando is committed to redevelopment of contaminated and potential contaminated sites into viable economic and community development projects. The City will perform community-wide hazardous substance and petroleum assessments on multiple properties within the City's Parramore community. The City will utilize the data collected from Task 1 along with community and stakeholder input to identify and prioritize properties for assessment.

B. Site Characterization – Phase I Site Assessment. The City will conduct up to 20 Phase I ESAs in accordance with ASTM E1527-05 “Standard Practices for Environmental Site Assessment: Phase I Environmental Site Assessment Process” and EPA’s All Appropriate Inquiries Final Rule (70 CFR 66070).

C. ESA and NHPA. The City will comply with applicable requirements under the Endangered Species Act and the National Historic Preservation Act. As required, the City will screen sites for any threatened or endangered species or habitat which may be affected by the projects. The City will seek guidance from the EPA Project Officer concerning the applicability of these requirements on a case by case basis. The City will contact the appropriate State Historic Preservation officer for sites with potential national historic significance.

D. Quality Assurance & Health and Safety Plans. The City will develop a Generic QAPP document for their Brownfields Program. Upon successful completion of Phase I ESAs, the City will provide Site-Specific QAPPs and Health and Safety Plans (HASP) conducted in accordance with EPA requirements and terms and conditions. For sites requiring further investigation which may include soil and groundwater sampling, Orlando will submit up to 8 Site-Specific QAPPs for review, comment, and ultimate approval. In the event that modifications are required to the QAPPs that have been submitted, the City will submit QAPP addenda as requested by EPA. The City will also prepare and follow an OSHA-compliant HASP for the sites requiring further investigation: the City will place copies of QAPPs and OSHA-complaint HASPs in the required Informational Record for the project.

E. Site Characterization – Phase II Assessment. The City of Orlando will conduct up to 8 Phase II ESAs in accordance with ASTM E1903-97 or equivalent and EPA terms and conditions. These Phase II ESAs will result from recommendations made by qualified environmental professionals as a result of Phase I ESAs.

Prior to spending any funds for Phase II ESAs, the City will submit and obtain approval of an EPA Region 4 Site Eligibility Determination Outline from the EPA Project Officer.

TASK 3 REMEDIATION & REUSE PLANNING

In the event that selected sites require remediation, the City may provide remediation and reuse planning to facilitate the productive reuse of environmentally-impaired properties. The City will work cooperatively with FDEP to determine necessary remedial activities, as applicable. The City will complete necessary remediation planning under the EPA terms and conditions but recognizes that FDEP’s requirements also must be met. The City may also utilize funding under this task to perform reuse plans to determine the potential for reuse of brownfield sites and the feasibility of proposed end uses for brownfields properties. Basically, this funding is interchangeable, i.e., this funding can be used for either ABCSs/equivalent documents of Brownfields Reuse Plans as appropriate.

A) Analysis of Clean up Alternatives. The City will conduct up to 4 ABCAs resulting from recommendations from Phase II ESAs completed by qualified environmental consultants. The ABCAs will also serve as the framework for remedial action plans required under Florida’s Chapter 62-785 (Brownfield Cleanup Criteria Rule). Sites undergoing remedial planning through the City’s Brownfield

Program will be encouraged to evaluate entering into a Brownfield Site Rehabilitation Agreement (BSRA) with FDEP that provides the regulatory framework for assessment and remediation and potential redevelopment of environmentally impacted sites within Florida.

The ABCA or its equivalent will include:

- 1) Information about the site and contamination issues (i.e. exposure pathways, identification of contaminants, contaminant levels and contaminant sources, source volume of other estimates as needed to compare relative costs between remedies).
- 2) Identification of the contaminants of concern.
- 3) A summary of cleanup/protectiveness standards, applicable laws and regulations.
- 4) A description of the remedial alternatives considered.
- 5) Assessment of the effectiveness, implementability, and the cost of each alternative. As part of the evaluation of effectiveness, discuss whether/how each alternative would achieve cleanup/protectiveness standards and would comply with applicable laws and regulations.
- 6) A comparative analysis of the alternatives considered.
- 7) A selected or proposed alternative.

In consultation with the City, the City's environmental consultant will consider the use of institutional controls, as well as engineering controls, as a part of the analysis of Brownfields cleanup alternatives.

B) Brownfields Reuse Plans. The City may also utilize funding under this task to perform up to 4 Reuse Plans to determine the potential for the reuse of brownfields sites and the feasibility of proposed end uses of brownfields properties.

C) Final Cleanup Plan. In the event that the proposed budget can accommodate additional remedial planning, the City may provide assistance to eligible sites to complete Remedial Action Plans (RAPs) under Florida Chapter 62-785 and executed BSRA's. As mentioned above, the ABCAs completed to meet EPA terms and conditions will provide the framework for RAPs required under the FDEP Brownfields Program.

TASK 4 PUBLIC OUTREACH/INVOLVEMENT

The City will perform public involvement, consistent with the Assessment Grant Proposal requirements, to ensure that community concerns are considered in assessment planning and execution, and the public is kept informed of project progress and results and to encourage public involvement in the project.

The City will develop a Community Engagement Plan (CEP) to further identify mechanisms the City intends to utilize over the life of the grant in order to support community outreach. Presently, the City utilizes their web site and local newspapers to keep interested stakeholders informed of the City's redevelopment and revitalization activities. City staff will attend brownfields related training conferences/workshops to obtain training and share progress as their Brownfields Program develops.

TASK 5 PROGRAMMATIC SUPPORT

A) Federal Funding Accountability & Transparency Act (FFATA). The City is registered with Central Contractor Registration, www.CCR.gov and will comply with further reporting requirements of FFATA as applicable.

B) Quarterly Reporting. The City will submit Quarterly progress reports 30 days after the end of each federal fiscal quarter, or:

<u>Performance Period</u>	<u>Report Date</u>
October - December	January 30
January - March	April 30
April - June	July 30
July - September	October 30

The quarterly reports will be completed in the format required and copies will be sent to the following three email addresses, as applicable:

1. EPA Region 4 Project Officer – Brian Gross (gross.brian@epa.gov)
2. EPA’s Brownfields Data Manager (bf_forms@epa.gov)
3. State Brownfields Coordinator (George.houston@dep.state.fl.us)

C) Semi-Annual Reporting. To support the federal government’s goal of supporting disadvantaged business enterprises with federal funds, the City will seek opportunities to participate in the goal where possible. The City acknowledges that participation is not mandatory, but reporting is. The City will use EPA Form 5700-52A for this reporting, and will submit this form and Financial Reimbursement Forms with the quarterly report to:

EPA Region 4
Grants Management Office
61 Forsyth St., 14th Floor
Atlanta, GA 30303
Attn: Keva Lloyd

The City will submit WBE/MBE utilization information semi-annually as required by April 30th and October 30th during each reporting period.

D) Annual Reporting (Federal Financial Reports (FFRS)). The City will submit a Federal Financial Report EPA Standard Form 425 on an annual basis by January 30th of each reporting year. The FFR will be submitted to the EPA Project Officer both electronically and by hard copy to:

U.S. EPA Las Vegas Finance Center
PO Box 98515
Las Vegas, NV 89193-8515
Attn: Sharen Rheinhardt

-and-

Rheinhardt.Sharen@epa.gov

E) Annual Projections. The City will make projections on an annual basis and provide these projections to the EPA Project Officer by the 30th day of April every year during the grant period. The projections will include the anticipated number of Phase I and Phase II ESAs that are expected to be completed in the upcoming year. The listed sites will be a subset of the total number of sites where Phase I and II ESAs will be conducted during the entire project performance period.

F) Final Performance Report. The City's Final Quarterly Report will become the Final Performance Report. It will be submitted to the EPA Project Officer within 90 calendar days after the expiration or termination of the award. The report may be provided to the Project Officer electronically or by mail. The report shall generally contain the same information as in the Quarterly Progress Reports but will include a chart summarizing all site assessed during the grant, a summary of outreach materials produced, and site photos of the assessment site(s). In addition, the Final Performance Report will specifically address lessons learned during the project both by the City and contractor(s) in implementing the Brownfields assessment as well as successes achieved.

G) ACRES/Property Profile Form. (<http://www.epa.gov/brownfields/pubs/acres/acresinfo.htm>)

The City will submit/maintain property specific information via the on-line ACRES database. The information in the quarterly report will correlate with the information in ACRES< a national database from which project status information is extracted and reported to Congress and the public. Relevant portions of the database will be updated for each property when the following occur:

- a. Within 30 days of the cooperative agreement award for site-specific assessments, or selection of the assessment property for community-wide assessments
- b. Completion of Phase I ESAs
- c. Completion of Phase II ESAs and Phase II ESA Addenda and Limited Site Assessments
- d. Completion of the grant

H) Contractor Procurement. Due to the specialized/technical skills needed for this project, the City will procure Brownfields Consulting Services and Environmental Engineering Services from an experienced brownfields firm to carry out the tasks for this grant and for future EPA Brownfields Grants. The City's procurement procedures fully comply with all State and Federal purchasing requirements and procedures including 40 CFR Part 30 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-profit Organizations of 40 CFR Part 31 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments.. The City anticipates that procurement will occur within 60-90 days.

The City will include a Site-Specific Budget Summary in order to demonstrate that expenditures on a single site do not exceed the \$200,000 statutory limit. Additionally, procurement language will include a provision to invoice costs site-specifically and include an overall programmatic task to include costs that would be shared across all sites, such as the generic QAPP development. Site-Specific sampling and analysis plans will be accounted for site-specifically.

I) Kick-off Meeting. Upon award, the Orlando Brownfields project team, environmental contractor, EPA and State partners will have an on-site project kick-off meeting to orient all the partners to project

expectations. Roles and responsibilities, as well as project schedules, will be distributed to each team member and discussed at this meeting.

TASK 6 PUBLIC HEALTH MONITORING

The City will develop a public health monitoring plan and will coordinate with the Orange County Health Department and a health care provider network to implement public health monitoring activities within the City. The City plans to address issues such as negative environmental impacts to public wells, groundwater, surface water, soil and other contaminated media. The intent is to address potential lead-based paint issues due to the age of some of the City's housing stock and the substantial population of children in the community.

3.0 DETAILED SCHEDULE DEVELOPMENT (ATTACHMENT 1)

4.0 BUDGET TABLE FOR WORK PLAN TASKS (ATTACHMENT 2)

5.0 ANNUAL PROJECTS (ATTACHMENT 3)

6.0 AAI REPORTING REQUIREMENTS CHECKLIST FOR PHASE I ESAS (ATTACHMENT 4)

Attachment 1: Guideline for Detailed Schedule Development - Assessment

Time from Notice of Selection		Actions
Grant Commitment and Planning Phase		
0 month	Notice of Selection, May 24, 2012: Application Forms Webinar held June 6 & 8, 2012	
3 weeks	Grant Application Submitted with Draft Work Plan and detailed schedule CAR Internal Grants Management Team is in place with set roles	
2-4 months	CAR pre-award activities such as Community Engagement Plan and consultant RFP (with prior Project Officer approval)	
2 months (Submitted June 21, 2013)	EPA works with CAR to finalize draft work plan (by August 1, 2012)	
3-4 months	EPA executes grant award	
September 26 & 27, 2012	New Grantee Orientation in Atlanta, GA	
Time from Grant Award		Actions
Startup		
Planning	0 months	Grant award
	0-3 months	Request for Proposal (RFP) for contractor procurement is finalized
	1-4 months (April 23, 2013) (May 30, 2013)	Consultant contract executed and contractor on-board Kick-off meeting held with CAR, Contractor, EPA, State First Meeting with Community, Complete Community Engagement Plan
Grant Specific Schedule		
Year 1	4-7 months	Initial Site Inventory activities completed / Site Selection Priority Process established (with input from Community) and implemented
	4-7 months	Phase I activities initiated on first priority sites (concurrent with Inventory Refinement & Community Input)
	4-7 months (submitted Sept. 18, 2013)	Community-wide grants develop generic QAPP (concurrent w/Phase I report writing); submit to EPA/State (allow 4 weeks for approval)
	6-9 months	Phase I reports are being finalized/ACRES forms are being updated/Community has been engaged in Phase I findings
	7 months	Submit projections to EPA Phase I & Phase II ESAs for next year
	8-9 months	Submit site eligibility forms to EPA/State (for Petroleum Sites); obtain site access
	9 months	Site-Specific QAPPs submitted to EPA/State for each property (allow 2 weeks for approval)
	10 months	Phase IIs initiated
	11-13 months	Phase II reports are being finalized; ACRES forms are being updated; Community has been engaged in Phase II findings
	11-13 months	Access status to ensure work is on target to meet set year end goals, if not inform EPA Project Officer as soon as possible in writing
Year 2	12-24 months	Phase I planning to Phase II initiation cycle for community-wide grants repeats year one cycle, but it should be shorter/faster in repetitive cycles for subsequent properties
	12-24 months	Begin clean-up planning (ABCA) on sites where cleanup funds may be desired Submit to EPA/State for review/comment/public involvement

		Begin securing/seeking financial support for cleanup
	18 months	Half of 3 year grant is complete; check-in with EPA/State for any modifications to work plan budget or scope of work. 35% of funds should be expended by this time.
	19 months	Submit projections to EPA for Phase I & IIs for the next year
Year 3	24 months	One year left on grant; concrete plans should be in place to accomplish CAR's goals for the grant and to spend remaining grant funds. All or most site specific QAPPs for Phase IIs should be submitted. (No QAPPs will be accepted after month 30)
	26 - 30 months	Phase I planning to Phase II initiation cycle for community-wide grants repeats year one cycle, but it should be shorter/faster in repetitive cycles for subsequent properties. Continue public involvement
	26 - 30 months	Clean-up planning (ABCA) on sites where cleanup funds may be desired Submit to EPA/State for review/comment/public involvement Begin securing/seeking financial support for cleanup
	28 months	Make sure all work has been entered in ACRES so that credit is given for all of CAR's accomplishments
	30 months	6 months remain on the grant; Start winding down activities in preparation for grant closing
	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 October 30, 2015 (30 days after 12 th 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 close, or December 30, 2015. Disadvantaged Business Enterprise (DBE) report due with this quarterly report.
	37 - 39 months	Submit final request for reimbursement with Final FFR (Standard Form 425); All Closeout documentation and final deliverables due within 90 days after project end date (December 30, 2015)

- Quarterly reports are due 30 days after the end of each quarter: Jan. 30, April 30, July 30 and Oct. 30.
- DBE/MBE reports are due with the April and October quarterly reports.
- ACRES data should be entered with each project phase and after significant work completion.
- Draw down expended funds at least quarterly or more frequently as expenditures warrant.

Attachment 2: Budget table for work plan tasks

Hazardous Substances							
	Inventory	Phase I/II Assessments	Remediation/Reuse Planning	Outreach	Programmatic Support	Public Health Monitoring	Total
Personnel	0	0	0	\$2,500	\$2,500	0	\$5,000
Travel	0	0	0	\$2,500	0	0	\$2,500
Supplies	0	0	0	\$2,500	0	0	\$2,500
Contractual	\$7,500	\$145,000	\$15,000	\$2,500	\$10,000	\$10,000	\$190,000
Total	\$7,500	\$145,000	\$15,000	\$10,000	\$12,500	\$10,000	\$200,000
Petroleum Products							
	Inventory	Phase I/II Assessments	Remediation/Reuse Planning	Outreach	Programmatic Support	Public Health Monitoring	Total
Personnel	0	0	0	\$2,500	\$2,500	0	\$5,000
Travel	0	0	0	\$2,500	0	0	\$2,500
Supplies	0	0	0	\$2,500	0	0	\$2,500
Contractual	\$7,500	\$145,000	\$15,000	\$2,500	\$10,000	\$10,000	\$190,000
Total	\$7,500	\$145,000	\$15,000	\$10,000	\$12,500	\$10,000	\$200,000
Grand Total							
	\$15,000	\$290,000	\$30,000	\$20,000	\$25,000	\$20,000	\$400,000

Attachment 3: Annual Projections

Draft Table Template

<u>Property/Site Name</u>	<u>Activity</u>	<u>Start Date</u>	<u>Completion Date</u>

**Attachment 4: AAI Reporting Requirements Checklist for Phase I Site Assessments
Conducted using EPA Brownfields Assessment Grant Funds**

Contact Information

Grantee Name: _____

Grant Number: _____

ACRES Property ID: _____

Program Manager Name: _____
(Point of Contact)

Contact Phone Number: _____

Name/Address of Property Assessed: _____

Checklist

Please indicate that each of the following All Appropriate Inquiries documentation requirements were met for the Phase I assessment conducted at the above listed property:

- An Opinion as to whether the inquiry has identified conditions indicative of releases or threatened releases of hazardous substances, and as applicable, pollutants and contaminants, petroleum or petroleum products, or controlled substances, on, at, in, or to the subject property.
- An identification of **“significant” data gaps** (as defined in §312.10 AAI final rule and §12.7 Of SATM E1527-13), if any, in the information collected for the inquiry, as well as comments regarding the significance of these data gaps. Significant data gaps including missing and unattainable information that affects the ability of the environmental professional to identify conditions indicative of releases or threatened releases of hazardous substances, and as applicable, pollutants and contaminants, petroleum or petroleum products, or controlled substances, on, at, in, or to the subject property.
- Qualifications and signature** of the environmental professional(s). The environmental professional must place the following statements in the document and sign the document:
 - “[I, We] declare that, to the best of [my, our] professional knowledge and belief, [I, We] meet the definition of Environmental Professional as defined in §312.10 of this part.”*
 - “[I, We] have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. [I, We] have developed and performed the all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.”*

Note: Please use either “I” or “We.”
- In compliance with §312.31(b) of the AAI final rule and §12.6.1 of ASTM E1527-13, the environmental professional must include in the final report an **opinion regarding additional appropriate investigation**, if the environmental professional has such an opinion.

Signature of Grantee Program Manager

Date