

# **Brownfields Assessment Cooperative** **Agreement Work Plan**

for

Coalition Assessment Project (Hazardous)

July 2014

Submitted by

**Northern Kentucky Area Development District**  
**Licking River Greenway Brownfield Coalition**

Prepared by

Northern Kentucky Area Development District  
22 Spiral Drive  
Florence, KY 41042

Elishia Chamberlain (859) 283-1885

## **1. Project Overview**

### **1.1 Project Description**

The Licking River Greenway (LRG) is an area in Northern Kentucky surrounding the Licking River; this specific area is contained within two of the northernmost counties in Kentucky: Kenton and Campbell. The LRG is encompassed within four cities: City of Covington, City of Taylor Mill, City of Newport, and the City of Wilder. The LRG Brownfield Coalition has come together in a concerted effort to help rehabilitate the LRG; this falls in line with a much larger regional plan devised by Vision 2015. The overall goal for the coalition is to eventually clean up and rehabilitate any and all sites within the LRG that may have hazardous substances or petroleum, or to repudiate any perceived notions of hazardous substances or petroleum at sites that are not contaminated. The LRG Brownfield Coalition will have to approach the meeting of this overall goal through various steps and projects. This Community-Wide Hazardous Assessment project will be one of many steps taken by the Licking River Greenway Brownfield Coalition and the Northern Kentucky Area Development District (NKADD) to reach this goal.

The objective of the LRG Brownfield Coalition Community-Wide Hazardous Assessment Project is to identify, assess, and remediate sites for rehabilitation. The coalition members will meet with a consultant for a prioritization and ranking process will occur for the inventory of potential sites located within the LRG. The inventory will come from existing lists of potential sites as well as community input and inferences. The formal prioritization will be based upon the sites' potential for environmental benefit, human health, ecological health, and economic impact. Phase I environmental site assessments (ESAs) will be conducted for selected sites; it is anticipated based upon the grant allocation and average costs that a total of twelve sites will undergo Phase I ESAs. For those sites meeting the criteria, a Phase II ESA will be conducted; it is anticipated that there will be funding for up to five Phase II ESAs. Following the completion of the Phase II ESAs the LRG Brownfield Coalition will work with a consultant in planning for remediation efforts of identified contaminated sites. During the remediation planning, discussions for cleanup will occur including applying for cleanup grants.

Outcomes for LRG Brownfield Coalition Community-Wide Hazardous Assessment Project:

- Complete inventory of potential hazardous sites
- Prioritization of potential sites (with continual updates throughout process)
- Completion of Phase I ESAs on 20-25 sites
- Completion of Phase II ESAs on an estimated 15 sites
- Remediation Planning for sites identified as contaminated (planning will remain in line for LRG Revitalization Plan)

## Background

The City of Covington and the City of Newport are located directly across the Ohio River from Cincinnati Ohio and these communities contain the majority of the population of the urban core in the Northern Kentucky region. The City of Newport (24<sup>th</sup> largest in the state) is located in Campbell County and Covington (fifth largest in the State) is in Kenton County. Both of these communities have the uniqueness of lying at the confluence of the Licking and Ohio Rivers, which has shaped their history; and will play the major role in their future growth and development. Just south of Newport and Covington lie the cities of Wilder in Campbell County and Taylor Mill in Kenton County. Wilder is contiguous to Newport and Taylor Mill to Covington. Three other cities were added to the Licking River Greenway Brownfield Coalition's focus area: the City of Bellevue, City of Dayton, and the City of Ludlow. Though these cities are not contiguous to the Licking River, they are located on the Ohio River and make up the major east to west corridor to the Greenway.

The concept of a Licking River Greenway (LGR) is one of many initiatives to improve the economy and quality of life in Northern Kentucky that were generated by community leaders under the guidance of Vision 2015. Vision 2015 is a ten year strategic plan for the Northern Kentucky region; it is also the name of a community group that governs the strategizing and implementation of the plan. The Licking River Greenway Master Plan goes beyond the initial vision to create a framework for establishing a continuous green corridor threading through the Licking River communities of Covington and Taylor Mill in Kenton County and Newport and Wilder in Campbell County. The plan is multi-faceted, presenting details for developing bicycle and pedestrian trails, creating new river access points, and enhancing habitat along the banks of the Licking River, while making connections with parks, schools and other existing facilities in adjoining neighborhoods. Open spaces and existing street systems near the river's edge have been integrated into the five-mile study corridor. Looking to the near future, the plan recommends ways to connect with other existing or planned pathways and projects along the Ohio River and Banklick Creek. Looking further ahead, implementation of the plan could result in a greenway system that could become an outstanding component of a more comprehensive Northern Kentucky regional park system. This Greenspace vision is the major initiative in the region for preservation of greenspace, especially in the urban core. It identifies that "the future land use of major industrial properties is uncertain' in the study area." The assessment of potential sites in the Licking River Corridor is a vital prerequisite to the implementation of this vision. This project will be a magnet for other development and will play a large role in bringing new city dwellers into the community. Economic Development professionals agree, "walkability" is a big factor in recruiting new people to the urban core.

A great percentage of the urban and minority poor live in the immediate vicinity of the LRG, the focus of this overall project. The distance between the Licking River and Interstate I-75 to the West, is approximately one mile. Within the LRG area in Covington, a major CSX railroad line, prime Ohio River riverfront development areas, most of the schools within the Covington School System, most properties of the Covington Housing Authority, the City's only primary care hospital, many historic districts, an IRS Services Center and U.S. Courthouse, and the bulk of our citizens, especially low income and minority. The distance across the LGA, between I-75 (in Covington) and I-471 in Newport is, approximately 2.5 miles. This 2.5 mile corridor, more

than anywhere else, is the urban core of Northern Kentucky. In Newport, all the schools, the historic district, downtown, riverfront development, government offices, housing authority properties, population, and social services lie in this area. Almost all of Newport lies between the Licking River and I-471 to the east

In this area buffered between I-75 and I-471, in the LRG, lie many potential Brownfields. The area is ripe for potential sites and redevelopment. Located within the LRG are steel plants, abandoned garages and service stations, scrap metal yards, dry cleaners, auto parts plants and other manufacturing plants, rail yards, river barge facilities and docks, and miscellaneous industries (abandoned and in-service). Covington, for example, has approximately 46 manufacturing facilities in the community, a large number of which are in this corridor. Both Covington and Newport were locations for many car dealerships and it is not uncommon to find an old hydraulic lift on sites to be developed. The presence of these environmental issues, whether perceived or real, can greatly limit redevelopment potential. In Covington, the city's minority and low income populations are concentrated in the northern portion of the city where the majority of the Brownfield sites have been identified or expected to be found. The growing Hispanic population can also be found in the area. Covington has the largest percentage of Northern Kentucky's minority population. Over 82% of the Northern Kentucky African American population lives in Covington, and the vast majority of them live in areas of high potential to be Brownfield sites. Back in the 2000 Census, Tract 671 made up 57% of the total minority population. Again, this area of Covington is likely to have the largest percentage of potential Brownfield sites.

The Licking River is adjacent to one of the Covington Housing Authority's family style homes and the site is undergoing a phased redevelopment and the focus of a HOPE VI grant. The Authority is currently developing 20 rental units and 20 home ownership units on vacant lots.

#### Current LRG Brownfield Coalition Perceived Conditions:

- Potential Brownfield sites are located near water intake valves of the Northern Kentucky Water District;
- Banklick Creek is a shallow, highly meandering waterway that flows eastward through Kenton County and Covington and emptying in the Licking River. This Creek is considered an impaired water body, since it is impacted by pollution sources and does not meet its designated use requirements for aquatic life and swimming. It does not meet water quality standards and water quality monitoring in the 1990s confirmed it does not meet these standards in part because of fecal coliform and low levels of dissolved oxygen. Sources include urban runoff, CSOs, sanitary sewer overflows, and upstream agricultural runoff;
- Brownfields pose of a threat to the blighting of the low income neighborhoods of Newport and Covington and reinvestment in these areas will result in significant improvement in the health and development of these neighborhoods;
- Health and safety risks abound in Newport and Covington because of deteriorated structures, which invite crime;
- The presence of hazardous substances in soil and ground water are most likely; and

- Previous grants have identified soil and groundwater risks and as old buildings are torn down, it is not uncommon to encounter across old underground storage tanks or other contaminants that were never known to exist.

A Brownfield Inventory was conducted for the City of Covington by the Northern Kentucky Area Planning Commission. It is estimated there are over 150 potential Brownfield within the LRG, including the main cities of Newport and Covington. Based on the existing inventory some of the potential uses of Brownfields funds and constituents of concern include foundries, rail yard terminals, factories, chemical and bulk oil storage yards, a manufactured gas plant, numerous dry cleaners, several lumber yards, scrap recycling and former gas stations and auto repair businesses.

### **Other Activities and Objectives**

The entire LRG project has been built on community engagement. The LRGC will continue their aspect of the project with community engagement as a building block. There will be an initial Community Engagement meeting held in late summer to bring all the communities together and inform them of the project as well as answer questions. We are asking that representatives from these communities bring input regarding sites for the inventory. Additional meetings will be held as needed in individual communities.

The EPA approved ongoing contract with Linebach Funhouser Inc (LFI) (for all brownfield programs managed by the NKADD) allows the NKADD to continue their work with LFI for the duration of this project. As the primary environmental consultant they will prepare the Generic QAPP for the project. They will be responsible for preparation of site specific QAPPs as well.

It is the hope of the Licking River Greenway that all sites assessed will be fully redeveloped in the near future. For those requiring cleanup, LFI will work with them and draft ABCAs and conduct all cleanup planning activities. All sites requiring remediation will also be briefed on cleanup funds available through the NKADD's BRLF program.

### **1.2 Project Team Structure and Responsibilities**

The Northern Kentucky Area Development District (NKADD) is the lead member of this LRG Brownfield Coalition Community-Wide Hazardous Assessment Project. The NKADD is a government entity created by the state legislature (KRS 147A.050). The NKADD is a means by which local officials and citizens unite to provide for the planned growth of their area. They are therefore a regional organization that assists in the formulation and implementation of human resource and infrastructure related plans. In addition to its regional planning role, the NKADD also provides technical and management assistance to local communities on a broad range of topics. The NKADD currently serves the eight most northern counties in Kentucky. The organization has a long and successful history in working with local governments to implement programs and projects that serve the community.

The City of Covington, Kentucky and the City of Newport, Kentucky are defined by the EPA and CFR Part 31 as units of local government. These two municipalities serve as the other two Coalition members for this project.

The NKADD has been successfully administering federal and state grants for over forty years. The NKADD Community Development Department has a staff of five employees dedicated to writing, strategizing, implementing, and administering these programs. Hence, the NKADD's position as project leader of the LRG Brownfield Coalition; all necessary steps will be taken to implement this program successfully and according to all guidelines set forth by the EPA. The NKADD will work with the environmental consultant and/or a qualified environmental engineer in compliance with EPA Brownfield guideline Section IV.F. The NKADD will work hands on with the consultants and/or the environmental engineer in monitoring of all steps in the assessment process. They will also be the fiscal agent for monitoring all fund expenditures at the discretion of the other two coalition members as well as the partner commission. Both the City of Covington and City of Newport have also successfully administered many federal and state grants. The NKADD will use the knowledge gained from the many successes of the LRGC Petroleum Assessment Project as well as insight from the two member cities to move forward in this new endeavor with success.

Out of the five staff members that the NKADD will be committing to the administration of this project, the two project leaders will consist of Elishia Chamberlain (Senior Community Development Planner) and Sara Jo Shipley (Community Development Planner). They will lead the coalition in the choosing of a qualified environmental engineer and consultant, they will monitor the inventory and prioritization process, provide all financial management (with oversight by the other coalition members), and be responsible for all mandatory reporting. These two staff members will establish the coalition's project files which will be maintained at the NKADD offices.

The LRG Brownfield Coalition members in addition to the multiple partnering agencies will serve as the project team. The team initially met to discuss an overall plan of action for project completion. An inventory meeting will be held to create the first round of sites to be assessed shortly following a community engagement meeting. Following the community engagement meeting another meeting will take place that will include all members, partners, consultant(s), state partners, and Region IV EPA Project Manager. This will serve as the official kick-off meeting. This meeting will serve as a platform for discussion on member roles, responsibilities, and project timeline. Following this meeting the LRG Brownfield Coalition members will meet as needed (most likely every other month) with consistent dialogue taking place via phone and email between meetings. Full meetings with all partners will take place as needed; however, all partners will be updated with pertinent information after each major milestone is completed.

All reports will be prepared and submitted to required state and federal agencies as required by EPA Brownfield guidelines by NKADD staff. The various submission dates are included in the attached 'Guideline for Detailed Schedule Development'.

The Kentucky State Brownfields Office consists of both Herb Pettijean and Amanda LeFevre. They are with the Division of Compliance Assistance and can be reached at 800-926-8111.

The Cooperative Agreement Terms and Conditions will be sent to the two municipalities serving as members of the agreement. All hard copies of contracts, agreements, and reports will be maintained at the NKADD offices, as well as electronic files. Reports can be reviewed by members upon request. Public inquiries about the program can be requested by phone, email, or through the Licking River Greenway Brownfield site ([www.lrgbrownfield.org](http://www.lrgbrownfield.org)).

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

#### **Outputs:**

- Complete inventory of potential hazardous sites
- Prioritization of potential sites
- Completion of Phase I ESAs on 20-25 sites
- Completion of Phase II ESAs on 15 sites
- Remediation Planning for sites identified as contaminated (planning will remain in line for LRG Revitalization Plan)

#### **Outcomes:**

- It is anticipated that multiple sites assessed will be remediated and redeveloped into greenspace or viable businesses lending to the overall vitality of the LRG region.
- Remediation of properties will lead to increased health of the Licking River and the LRG by decreasing contaminated runoff from properties.
- Remediation of properties will directly affect job creation. As properties are redeveloped into viable businesses more jobs will be created. The sites redeveloped into greenspace will serve as an attraction to new business and residents in the area. This will lead to a healthier living space and more job creation.

### **1.4 Measures of Success**

#### **Short Term:**

- Staying on target with Timeline (Attachment 1)
- Community Engagement Meetings well attended by interested parties
- All reports submitted on time
- Completion of Phase I and Phase II Assessments on high ranking sites

- Remediation Planning for assessed sites

Long Term:

- Continuation of NKADD Brownfield Program working with LRGBC
- Full remediation and redevelopment of sites
- Completion of the Licking River Greenway with all Brownfield sites fully remediated
- Maintenance of the inventory list, with continued assessment of additional sites after the current project ends.



## **Project Task Descriptions**

### **Task 1: Project Management and Reporting**

The purpose of this task is to perform project management as required by the Brownfield Assessment Grant Guidelines.

#### **A. Federal Funding Accountability and Transparency Act (FFATA)**

The NKADD staff dedicated to this project will be responsible for all compliance with requirements set forth by the Brownfield Coalition Hazardous Assessment Grant. SAM and DUNS numbers were submitted at the time of application. All further actions will be completed as required by NKADD staff.

#### **B. Quarterly Reporting**

All quarterly reports will be submitted 30 days after the end of each federal fiscal quarter (quarterly performance period):

- October-December (Q1)—Due January 30
- January-March (Q2)—Due April 30
- April-June (Q3)—Due July 30
- July-September (Q4)—Due October 30

#### **C. Annual Reporting**

DBE (MBE/WBE) and the Federal Financial Reports (FFR) will be completed annually by NKADD staff. DBE will be submitted by October 30 of each year for the duration of the project.

1. **Disadvantaged Business Enterprise Reporting:** It is the federal government's goal to support disadvantaged business enterprises with federal funds. State agencies work with each federal agency to establish performance targets for federal funds invested in that State. All CARs are encouraged to utilize the services of DBEs, where possible. The CAR must report DBE activities on an annual basis using EPA Form 5700-52A. The CAR must submit the form with the quarterly report due October 30 of each project year.

a. These forms should be sent electronically in separate attachments along with the corresponding quarterly reports to the EPA Project Officer.

b. The forms must also be mailed via hard copy and electronically to the EPA Grants Office on an annual basis to the following address:

**EPA Region 4  
Grants Management Office (GMO)  
61 Forsyth St., 14th Floor  
Atlanta, GA 30303**

**ATTN:** See EPA Project Officer for the GMO contact's name & email address

Useful link: [http://www.epa.gov/ogd/forms/adobe/5700\\_52a\\_new\\_sec.pdf](http://www.epa.gov/ogd/forms/adobe/5700_52a_new_sec.pdf)

2. **Federal Financial Reports (FFRs):** Federal Financial Reports (EPA Standard Form 425) must be submitted annually to EPA by January 30 of each project year.
  - a. These forms should be sent electronically in separate attachments along with the quarterly reports to the EPA Project Officer.
  - b. The forms must also be mailed via hard copy and electronically to EPA's financial center in Las Vegas on an annual basis and at the close of the grant to the following address:

**U.S. EPA Las Vegas Finance Center  
PO Box 98515  
Las Vegas, NV 89193-8515  
Fax: 702-794-2423  
ATTN: Wayne Taylor  
Taylor.wayne@epa.gov**

Useful link: <http://www.epa.gov/ogd/forms/adobe/SF425.pdf>

#### **D. Annual Projections**

Annual Projections: On April 30 of each project year (i.e., April 30, 2015; April 30, 2016; and April 30, 2017), the CAR will project the specific sites where Phase I and Phase II ESAs are expected to be completed in the upcoming year (see Attachment 3). This Projections list may be submitted with the quarterly report. 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.

#### **E. Final Performance Report**

The Final Quarterly Report may be used as 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 EPA Project Officer electronically or by mail. The report shall contain the same information as the Quarterly Progress Reports, and will also summarize the key deliverables over the life of the grant, including:

- A chart summarizing all sites assessed during the grant, the work completed, and the funds expended at each site;
- A list of all the outreach materials produced;
- Site photographs (on disk), where available; and
- Lessons learned

#### **F. ACRES Property Profile Form**

Property specific information will be submitted and regularly maintained via the on-line ACRES database. The information in the quarterly report should correlate with the information in ACRES. Relevant portions of the database must be updated for each property when the following occur:

- Completion of Phase I (must include site address)
- Start of Phase II
- 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

#### **G. Contractor Procurement**

The Licking River Greenway Brownfield Coalition will be utilizing the services of an environmental contractor/consultant for the bulk of this project. The contractor will conduct the prioritization for the community-wide assessments as well as conduct both Phase I and Phase II ESAs. They will also be used in the remediation planning for any contaminated hazardous sites. The NKADD (the LRGBC grant recipient) has an ongoing Brownfield program. The EPA approved an ongoing contract with the NKADD's current consultant, LFI, with procurement for the NKADD BRLF program. Both the NKADD and LFI have decided to continue use of this ongoing contract for the LRGBC Hazardous Assessment Project. This will save time and money allowing the project to be expedited more quickly. In the event that a secondary consultant is to be brought on, they will be contracted through LFI. If at any time LFI is unable to serve as the full time primary consultant the NKADD will follow all EPA Guidelines with procurement to hire a second consulting firm.

#### **H. Kick Off Meeting**

Once instructed by the EPA Region IV Project Manager, the NKADD will move forward with the Kick-Off Meeting. This meeting will include the CAR partners, state partners, Region IV Project Manager, environmental consultant, and any interested parties. This meeting will detail all expectations for the project and serve as the official starting point for work. The LRGBC has

already had their first partners meeting that included the other two members within the coalition. Roles and responsibilities were discussed at this time. They will be reviewed again at the Kick Off Meeting.

**\*Task 1 will be conducted by NKADD Brownfield Staff.**

## Task 2: Public Involvement

The LRG Brownfield Coalition will be incorporating public involvement into their overall plan for the LRG Brownfield Coalition Community-Wide Hazardous Assessment Project. The LRG Brownfield Coalition will keep the public informed of project progress and results as the project proceeds; public input will be taken during various stages of the project. It is the intent of the coalition to recognize the residents' and business owners' thoughts and concerns on a project that can have a large impact on their day to day lives. The LRG Brownfield Coalition will take multiple steps to ensure that all citizens within the project area are informed of the project, and that all interested parties will have the ability to follow the project throughout its duration. Public notices will be made in various media outlets, community meeting areas, and through the NKADD regional newsletter. The intent of this large array of announcements will be to draw in the citizenry as well as multiple stakeholders including borrowers, redevelopers, and all other stakeholders. Funding has been allocated for supplies and costs associated with the marketing of this project.

### Outreach

The NKADD staff will serve as the designated spokesperson for this project; they will have their contact information available for contact so that any interested persons can contact them with their thoughts or concerns. The NKADD manages a website for this project ([www.lrgbrownfield.org](http://www.lrgbrownfield.org)). This website will contain information from both the past petroleum project as well as all information pertaining to the current program. The information repository will be located at the NKADD offices as well. Any public information requests can be made through the designated NKADD staff, and they will ensure any requests are met within EPA Brownfield guidelines.

### Project Updates and Public Information

As previously mentioned, there will be an information pamphlet that will be distributed to residents and business owners in the project area; this pamphlet will serve as a fact sheet for the project. Upon completion of the project another pamphlet will be distributed noting the results of the assessments as well as remediation planning. During the project implementation other avenues of information distribution (meetings, media events, roundtable discussions, etc...) will occur as needed.

### **Task 3: Site Inventory and Characterization**

#### **Site Inventory**

A site inventory will be composed by the LRG Brownfield Coalition; this inventory will consist of known or perceived hazardous sites. This inventory will include information from existent information pertaining to Brownfield sites in the LRG, public input, and suggestions from the various experts partnering with the coalition. There will be comment periods for the public throughout the process; the LRG Brownfield Coalition partners include several community groups that will assist with outreach and collection of public input.

#### **Candidate Site Identification**

Candidate sites for assessment will be identified as mentioned above. Site eligibility will be verified with the EPA and Kentucky Brownfields Program. The prioritization process will occur with the coalition, expert partners, and a consultant. Phase I ESAs will be conducted on the highest priority sites; with expected cost being \$2,500 per Phase I ESA it is anticipated that there will be an allowance of 20-25 sites to undergo Phase I ESAs. This number may change due to costs of assessments. It is anticipated that there will be a much larger number of sites inventoried than what can be assessed. The prioritization process will allow for a ranking of these sites to ensure that the highest priority sites receive the assessments. The prioritization will be based upon the following criteria:

- Underutilized or abandoned former gasoline stations
- Threat to human health and/or the environment
- Impact on Community
- Potential for redevelopment and/or reuse
- Commitment of site owner to the redevelopment process
- The value of the site to the Licking River Greenway overall plan

#### **Site Characterization—Phase I Assessment**

The Licking River Greenway estimates that they will be able to conduct approximately 20-25 Phase I ESAs for hazardous sites; these will be conducted on their highest ranking sites from the prioritization process. A contractor will be hired to complete Phase I ESAs consistent with all state and federal guidelines, pending EPA approval of site. If any sites have had previous Phase I ESAs completed, all pertinent information will be documented and submitted to the EPA.

## **Site Characterization—Phase II Assessment**

The LRG will use their hired contractor to conduct Phase II ESAs on sites ranked with the highest priority, that are EPA approved, and by community need. The number of sites that will be assessed will be contingent on cost of Phase II assessment. Currently it is estimated that a Phase II ESA will cost between \$25,000 and \$35,000 allowing for roughly 15 Phase II ESAs to be conducted.

The LRG Brownfield Coalition will use their hired consultant/contractor to prepare Quality Assurance Project Plans (QAPPs) and any other necessary plans such as Health Safety Plans (HSPs) or Sampling and Analysis Plans (SAPs) for each site where a Phase II ESA will be performed. These plans will identify and establish practices and procedures to assure that the overall project will be implemented in a manner that provides acceptable, useable results according to the US EPA guidelines and recommendations. The plans will be submitted to the EPA and the Kentucky Brownfield Program for review and approval prior to performance of any sampling.

The CAR recipient will provide information on the location of each Phase II and comply with all ESA, NHPA, and Clean Water Act regulations. The EPA will be informed of an endangered species on the site, any habitat that may be affected by the project, and any historic designations.

**\*\*Task 3 will be conducted by NKADD Staff and environmental consultant, LFI.**

#### **Task 4: Cleanup Planning**

The LRG Brownfield Coalition has allocated funds for remedial planning and design for cleanup of qualified sites. The contractor will prepare an Analysis of Brownfields Cleanup Alternatives (ABCA) and/or equivalent state required documents describing the findings of the assessment phases and presenting an evaluation of cleanup alternatives. This will be submitted to the EPA and Kentucky Brownfield Program.

The ABCA will summarize information about the site and its contaminants. This summary will include exposure pathways, identification of contaminants, contaminant levels and contaminant sources, source volume or other estimates as needed, cleanup standards and applicable laws, alternatives considered, and the proposed cleanup plan.

The proposed cleanup plan will include the cleanup standards to be achieved and any institutional, land use, or engineering controls that will be required as part of the cleanup. The plan will be forwarded to the Kentucky Brownfield Program to ensure it meets all state and federal guidelines.

**\*\*Task 4 will be completed by the environmental consultant with oversight by the NKADD Brownfield Staff.**



## **Attachments**

Attachment 1: Detailed Schedule

Attachment 2: Budget Table for Work Plan Tasks

Attachment 3: Annual Projections

Attachment 4: AAI Reporting Requirements Checklist

Attachment 5: Quarterly Reporting Template

## Attachment 1: Guideline for Detailed Schedule Development - Assessment

- Start approved Phase I activities as soon as sites are identified (no need to wait for a final site inventory).
- Make community engagement a cornerstone of the program; it helps build the site inventory and program commitment.
- 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.

<b>Time from Notice of Selection</b>	<b>Actions</b>
<b>Grant Commitment and Planning Phase</b>	
<b>0 month</b>	Notice of Selection, May 27, 2014; Application Forms Webinar held June 11 & 18, 2014
<b>3 weeks</b>	Grant Application Submitted with Draft Work Plan and detailed schedule CAR Internal Grants Management Team is in place with set roles
<b>2-4 months</b>	CAR pre-award activities such as Community Engagement Plan and consultant RFP (with prior Project Officer approval)
<b>2 months</b>	EPA works with CAR to finalize draft work plan (by August 1, 2014)
<b>3-4 months</b>	EPA executes grant award
<b>Oct. 7-9, 2014</b>	New Grantee Orientation in Atlanta, GA

<b>Time from Grant Award</b>	<b>Actions</b>	
<b>Startup</b>		
<b>Planning</b>	<b>0 months</b>	Grant award
	<b>0-3 months</b>	Work Plan Completed; Move forward with contracted consultant; hold first LRG Meeting
	<b>1 - 4 months</b>	Consultant contract executed and contractor on-board Kick-off meeting held with CAR, Contractor, EPA, State First Meeting with Community, Complete Community Engagement Plan
<b>Grant Specific Schedule</b>		
<b>Year 1</b>	<b>4 months</b>	Quarterly Report 1 is due January 30, 2015 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
	<b>4 - 7 months</b>	Initial Site Inventory activities completed / Site Selection Priority Process established (with input from Community) and implemented
	<b>4 - 7 months</b>	Phase I activities initiated on first priority sites (concurrent with Inventory refinement & Community Input)
	<b>4 - 7 months</b>	Community-wide grant recipients develop generic QAPP (concurrent with Phase I report writing); submit to EPA/State (allow 4 weeks for approval)
	<b>6 - 9 months</b>	Phase I reports are being finalized/ACRES forms are being updated/ Community has been engaged in Phase I findings
	<b>7 months</b>	Quarterly Report 2 is due April 30, 2015 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
	<b>7 months</b>	Submit projections to EPA for Phase I & Phase II ESAs for the next year
<b>8 - 9 months</b>	Submit site eligibility forms to EPA/State (for petroleum sites); obtain site access	

	<b>9 months</b>	Site specific QAPP(s) submitted to EPA/State for each property (allow 2 weeks for approval)
	<b>10 months</b>	Quarterly Report 3 is due July 30, 2015 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
	<b>10 months</b>	Phase IIs initiated
	<b>11 – 13 months</b>	Phase II reports are being finalized; ACRES forms are being updated; Community has been engaged in Phase II findings
	<b>11 -13 months</b>	Assess status to ensure work is on target to meet set year end goals, if not inform PO as soon as possible in writing
<b>Year 2</b>	<b>13 months</b>	Quarterly Report 4 is due October 30, 2015 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted Disadvantaged Business Enterprise (DBE) due with this quarterly
	<b>12 – 24 months</b>	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
	<b>12 – 24 months</b>	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
	<b>16 months</b>	Quarterly Report 5 is due January 30, 2016 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
	<b>18 months</b>	<b>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.</b>
	<b>19 months</b>	Quarterly Report 6 is due April 30, 2016 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
	<b>19 months</b>	Submit projections to EPA for Phase I & IIs for the next year
	<b>22 months</b>	Quarterly Report 7 is due July 30, 2016 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
<b>Year 3</b>	<b>24 months</b>	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 ( <b>No QAPPS will be accepted after month 30</b> )
	<b>25 months</b>	Quarterly Report 8 is due October 30, 2016 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted Disadvantaged Business Enterprise (DBE) due with this quarterly
	<b>26 – 30 months</b>	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.
	<b>26 – 30 months</b>	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
	<b>28 months</b>	Quarterly Report 9 is due January 30, 2017 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
	<b>28 months</b>	Make sure all work has been entered in ACRES so that credit is given for all of CAR's accomplishments
	<b>30 months</b>	6 months remain on the grant; Start winding down activities in preparation for grant closing
	<b>31 months</b>	Quarterly Report 10 is due April 30, 2017 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
	<b>34 months</b>	Quarterly Report 11 is due July 30, 2017 (30 days after 1 <sup>st</sup> quarter ends) Reimbursement Request Submitted
	<b>35 month</b>	Reconcile accounts; collect remaining invoices for submission; gather deliverables for final close-out report
	<b>36 months</b>	Grant project/budget period closes; no further costs can be incurred after final date
	<b>37 months</b>	Quarterly Report 12 is due October 30, 2017 (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 close, or December 30, 2017. Disadvantaged Business Enterprise (DBE) report due with this quarterly report.

	<b>37 – 39 months</b>	Submit final request for reimbursement with Final FFR (Standard Form 425); All Close-out documentation and final deliverables due within 90 days after project end date (December 30, 2017)
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- 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 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**

LRGBC Community Wide Hazardous Assessment Project

<b>Budget Categories</b>	<b>Project Tasks</b>				
	Task 1 Project Management and Reporting	Task 2 Community Involvement/ Engagement	Task 3 Assessment	Task 4 Cleanup Planning	Total
(Programmatic costs only)					
Personnel	\$2,000	\$11,300			\$13,300
Fringe Benefits					
Travel <sup>1</sup>	\$7,000				\$7,000
Equipment <sup>2</sup>					
Supplies		\$2,700			\$2,700
Contractual <sup>3</sup>			\$487,000	\$60,000	\$547,000
Contractual (NKADD)	\$30,000				\$30,000
Other – specify					
<b>Total</b>	<b>\$39,000</b>	<b>\$14,000</b>	<b>\$487,000</b>	<b>\$60,000</b>	<b>\$600,000</b>

### Attachment 3: Annual Projections

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