

**BROWNFIELDS ASSESSMENT
COOPERATIVE AGREEMENT WORK PLAN**

**Gautier Brownfields Assessment Project
July 1, 2014**

Submitted by:
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**ASSESSMENT COOPERATIVE AGREEMENT WORK PLAN
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1.0 PROJECT OVERVIEW

This portion of the narrative work plan should correspond with the approved proposal (without reciting all sections of the proposal). It should describe the City of Gautier's strategy for implementation of the cooperative agreement over the three-year project period, reflect the commitments made in the proposal, and include a schedule for completing all work within the three year period.

1.1 Project Description

The City of Gautier, Mississippi is located along the Mississippi Sound of the Gulf of Mexico, at the mouth of the West Pascagoula River, known locally as the "Singing River". The City covers approximately 32 square miles. It is located one hour west of Mobile, Alabama and less than two hours east of New Orleans, Louisiana, in the center of Jackson County on the Mississippi Gulf Coast. Gautier is centrally located between Pascagoula, the largest industrial area of Mississippi and the Biloxi-Gulfport area with a high concentration of tourism related jobs, many in the gaming industry. Gautier is situated adjacent to a rich estuary that provides valuable habitat and a nursery for many species of marine life in the Mississippi Sound. The estuary and its bayous represent invaluable habitat for migratory birds and many endangered species. Fishing and water activities are an integral part of Gautier life. On its northern fringes, Gautier encompasses a portion of the Mississippi Sandhill Crane National Wildlife Refuge, the last native population of this endangered bird. Gautier is a unique community with a State Park for campers from all regions, particularly during the winter months when "snow birds" escape severe temperatures up north.

Lumber and timber industries provided the basis for the area's growth through the earlier part of the twentieth century. The opening of the L & N Railroad Creosote Plant in 1874 was a major boost to the expansion of the settlement. Shipbuilding is another major industry in the area, recorded as early as 1838. This and other early shipyards were precursors of the state's largest existing private employer, Ingalls Shipbuilding (formerly Northrop Grumman Shipbuilding and Litton Industries). These historic industries have utilized contaminants that have the potential to impact the environment. Historic uses such as the rail lines that pass through the community, the local sawmill, creosote plant and shipbuilding industries that dot the City's landscape have left their environmental mark.

More recent development includes marinas with associated boat repairs and fueling, and the petroleum sites and drycleaners present at many commercial properties. Unfortunately much of Gautier's industry was located along the coast and impacted the fisheries of the region. With the devastating storms and hurricanes that inundate these waterside industries, contaminants may be carried not only into waters near the industries but also much further away.

The Brownfields Assessment Project fits into the City's overall plan for re-development and revitalization. Factors such as the devastation of Hurricane Katrina, the national economic downturn that began in 2008, and the BP Deepwater

Horizon Oil Spill in 2010 have all had major impacts on the Gulf Coast. The City of Gautier has several vacant strip malls and abandoned commercial properties that the City would like to see put back into use. A comprehensive plan was developed following Hurricane Katrina that included a \$6 million streetscape project to create a downtown area since the City lacked a true central business district. The Brownfields Assessment Project fits with this plan to identify and characterize potential contaminated sites so that they can be appropriately re-developed. The Singing River Mall built over thirty years ago is currently being demolished and will then be re-built with a private investment of \$90 million. It is expected that this new retail development will spur other development in the City, and City leaders feel that this Brownfields Assessment Project will facilitate the redevelopment and reuse of properties that need remediation or help rule out the possibility of contaminants in identified sites.

Potential Brownfields sites within the City that are of concern to the community and contained in the known inventory of sites that may be recommended include: dry cleaners, landfills, salvage yards, railroad facilities and lines, paint and body shops, automotive repair shops, marinas and fueling operations, car dealerships, wood product and lumberyards, creosote operations, boat supply and repair facilities, fuel facilities/petroleum sites, dental facilities, welding repair facilities, small engine repair facilities, and storage yards.

The City intends to accomplish major tasks over the next three years with Brownfields Assessment Grant funding. These include:

- A Community Engagement Plan and corresponding activities
- A complete inventory of regulatory sites
- 25 Phase I Assessments and 1 generic Quality Assurance Plan (QAPP)
- 4 site specific QAPPs
- 8 Phase II Assessments
- 4 Analysis of Brownfield Cleanup Alternatives (ABCAs) Reports
- Public Health Initiative

1.2 Project Team Structure and Responsibilities

The City of Gautier is the lead organization that will manage this project. The City of Gautier has a City Manager form of government. The City Manager, Samantha Abell, has the authority to obligate the City contractually following approval by the Mayor and City Council. The Economic Development and Planning Director, Chandra Nicholson, P.E. will be the Project Manager for this initiative. She will be assisted by the Building & Zoning Administrator, Lee Bond who will help with outreach and procuring site access, and the Grants and Projects Manager, Patty Huffman who will be responsible for grant administration. The City's Comptroller Teresa Montgomery will be responsible for the project budget and will assist with pay requests. The City of Gautier will obtain consultants as needed for the administrative, financial, technical and legal support needed to execute and manage this cooperative agreement. The City of Gautier will also procure, oversee and direct an environmental contractor. The Project Team has the qualifications to review and approve contractor documents and make the necessary site-specific decisions. The

City of Gautier will ultimately be responsible for following the project schedule and achieving the project objectives.

The City of Gautier's team will provide project updates to the State of Mississippi's Brownfields contact (Trey Hess at MDEQ) on a regular basis (at least quarterly). The City will make the State aware of all site-specific assessment activities to be initiated and will provide the State an opportunity to review and comment on all technical reports, including Quality Assurance Project Plans (QAPPs), sampling plans, Analysis of Brownfields Cleanup Alternatives (ABCAs), cleanup plans, and other technical reports. The team will also specifically notify the State for Phase II activities and will also request State and/or EPA *petroleum* site eligibility determinations for all petroleum sites. The State of Mississippi's Petroleum Contact at MDEQ will also be Trey Hess who can be reached at 601-961-5654 or by email at Trey_Hess@deq.state.ms.us.

The team members identified above will plan to meet at least twice per month for the first six months and monthly thereafter. The Cooperative Agreement Terms and Conditions will be distributed to the team participants prior to a kick-off meeting (if the documents are available). The Cooperative Agreement records will be maintained by the City's Grants & Projects Manager in the Economic Development & Planning Office. The Department Director will provide project oversight and the City's Comptroller will oversee the financial management of the project.

While the bulk of the budget will be used for the environmental consultant, the City has budgeted some City staff time for outreach activities, recruitment of potential sites, site access permission, project management and oversight, and administrative tasks. More specifically, the city staff budget includes activities such as: Project Team meetings, development of outreach materials and website/media press releases and updates, community outreach meetings, advisory group meetings, obtaining site access permission, and preparation of required reports and reimbursement requests in addition to contractor and overall project oversight. Two staff members have made reservations to attend the New Grantee Workshop in Atlanta in October 2014, and the budget includes an additional Brownfield-related conference or workshop during the three year grant period. Some mileage reimbursement is also included for outreach activities and site visits. Basic office supplies and printing costs are included in the budget as well as a laptop computer and software to be used for outreach presentations/information sharing. It is anticipated that a contractual arrangement will be made with the local Jackson County Health Department for assistance with health-related data collection and information sharing.

1.3 Measuring Environmental Results: Outputs

- Development of an area-wide plan based on community involvement
- Advisory board established
- 4 or more community involvement meetings to gather public input
- Semi-annual outreach reports produced for general public distribution
- Project Team meetings held twice a month for first 6 months and monthly thereafter

- 25+ sites identified through community involvement/team suggestions and database searches of regulatory site lists
- 25 Phase I environmental site assessments
- 8 Phase II environmental site assessments
- 1 Generic QAPP
- 4 Site-specific QAPPs
- 4 ABCAs

Outcomes

- Increased awareness by the general public about brownfields and remediation methods are expected as measured by community meeting involvement, social media responses, and other feedback from the community.
- It is anticipated that at least five (5) of the 25 sites identified for this project will ultimately be made ready for reuse either through remediation or due to correcting an incorrect perception regarding contaminants.
- The five (5) sites made ready for reuse are expected to result in at least ten (10) new jobs and an increased tax base for the City.

1.4 Measures of Success

Success for this project will be measured through tracking the expected short-term and long-term project outputs and outcomes. This will be accomplished by tracking the following:

- Advertisement for and procurement of Environmental Consultant using required procurement procedures
- Kick-off meeting documentation
- Agendas and minutes from Project Team meetings (held twice per month during the first 6 months and monthly thereafter)
- Agendas, minutes and sign-in sheets from Community Involvement meetings (4 or more) and Advisory Group meetings
- Media coverage, social media posts, City website announcements, press releases
- Copies of information provided to community stakeholders at least every 6 months
- Attendance at Brownfields Conference in Atlanta (October 2014) and other related Brownfields conference/workshop during the grant period
- Project documents submitted timely and accurately including Work Plan, Quarterly Reports, Phase I and II Reports, QAPPs, Health and Safety Plan, ACRES forms, ABCAs, Annual Projections, Reimbursement Requests, Annual Reports, Final Report, and any other required documents
- Documentation of reuse of identified/assessed sites and new job creation (long-term)

2.0 PROJECT TASK DESCRIPTIONS

Outlined below are a number of common tasks for Brownfields Assessment projects, including certain required tasks described in the Cooperative Agreement Terms and Conditions. A project may require the inclusion of tasks in addition to those included below:

TASK 1 PROJECT MANAGEMENT AND REPORTING

A. Federal Funding Accountability & Transparency Act (FFATA): This is a new reporting requirement which occurs early in the grant. The Cooperative Agreement Recipient (CAR) is required to:

- a. Complete the System for Award Management registration (SAM) at the time of application (www.sam.gov). First tier subgrantees must register before receiving the subaward. A Data Universal Numbering System (DUNS) number from both entities (CAR and subgrantee) is required.
*The City of Gautier is already registered in the System for Award Management Registration (SAM).
- b. Register for the FFATA Subaward Reporting System (www.FSRS.gov) for first tier subawards. For CARs, this must be completed by the end of the month in which this award is made (generally by October 30, 2014), and, annually (by January 30) thereafter. Subawardees should register by the end of month following the month in which award for over \$25,000 is made (i.e., awards in October must be reported by November 30).

Significant limitations apply to this requirement. See the Administrative Terms and Conditions for more information.

B. Quarterly Reporting: Quarterly progress reports will be due 30 days after the end of each federal fiscal quarter (quarterly performance period):

<u>Quarterly Performance Period</u>	<u>Report Due</u>
October – December	January 30
January – March	April 30
April – June	July 30
July – September	October 30

Quarterly reports (see Attachment 5) should be sent electronically to both the EPA Project Officer and the State Brownfields Coordinator. Please send high resolution site/project photographs electronically (in a common format, such as JPEG), as well. These images may be used in EPA and State outreach materials and transferred to poster boards or other media.

C. Annual Reporting: Disadvantaged Business Enterprise (DBE) Reporting (also known as Minority Business Enterprise/Women-owned Business Enterprise (MBE/WBE)) and the Federal Financial Reports (FFR) must be completed annually.

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 City of Gautier must report DBE activities on an annual basis using EPA Form 5700-52A. The City of Gautier 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

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:** On April 30 of each project year (i.e., April 30, 2015; April 30, 2016; and April 30, 2017), the City of Gautier 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 Assessment Cleanup Redevelopment Exchange System (ACRES) database. The information in the quarterly report should correlate with the information in ACRES. ACRES is a national database from which project status information is extracted and reported to Congress and the public. 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

Useful link: https://cdx.epa.gov/SSL/cdx/EPA_Home.asp

G. Contractor Procurement: *Procurement must be done in accordance with 40 CFR Part 30 Uniform Administrative Requirements for Grants and Agreements with Institutions of Higher Education, Hospitals, and other Non-profit Organizations or 40 CFR Part 31 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments.*

The City of Gautier will procure an environmental contractor in accordance with 40 CFR Part 31 Uniform Administrative Requirements for Grants and Cooperative Agreements to State and Local Governments and will to the maximum extent practical, ensure open and free competition in our purchasing. The City will follow EPA's Grant Recipient Purchasing Requirements which can be found at: <http://www.epa.gov/ogd/recipient/procurement.htm>. The Gautier City Council approved advertising for environmental consultant professional services at its July 1st City Council meeting. City staff will advertise a Request for Qualifications in the month of July using the EPA's sample template. It is expected that a contractor will be approved by City Council during late August or early September.

Useful Link: <http://www.epa.gov/ogd/recipient/procurement.htm>

Since the City of Gautier applied for a community-wide agreement, a quarterly Site-Specific Budget Summary is required in order to ensure that expenditures on a single site do not exceed the \$200,000 statutory limit (see the Quarterly Reporting Summary and Template). The City of Gautier's contractor 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 generic quality assurance project plan development. Site-specific sampling and analysis plans will be accounted for site-specifically.

H. Kick-off Meeting: Once the contractor has been selected, the City of Gautier project team, EPA and State partners should participate in a project kick-off meeting. This will allow the team to establish goals and familiarize the partners with the project expectations. This will be a good opportunity to review roles and responsibilities, project schedules, and ensure that all committed team members have what they need to execute the project roles effectively.

Task 1 will be conducted by: City of Gautier's Grants & Projects Manager, Patty Huffman will be responsible for ensuring that each of the activities listed in Task 1 Project Management and Reporting are completed in a timely manner with assistance from other team members as needed.

TASK 2 COMMUNITY INVOLVEMENT / ENGAGEMENT

The purpose of community engagement is to involve the target community in meaningful ways to ensure the success of the project. This will include involvement in the decision-making process under the grant (such as site selection and prioritization; cleanup and reuse planning) as well as to share basic information about the progress of the project.

The City of Gautier is required to develop a **Community Engagement Plan (CEP)** covering processes, activities (e.g., public meetings), and planned deliverables (e.g., fact sheets, web page) over the life of the grant. The CEP will be an outline of planned activities and is expected to evolve based on project needs and community feedback. The plan will include components such as identifying our communities (neighborhoods, business community, property owners, etc.), timing and methods of seeking input, methods of communicating progress and education/information sharing. The CEP will be based on, and be consistent with, the plan outlined in our grant proposal, and should include the partners and key community-based organizations that were identified in our proposal.

Advantages of meaningful community engagement at the assessment stage include education and community support to facilitate property access and to obtain buy-in and active community assistance toward achieving the goals of the project. EPA encourages each Cooperative Agreement Recipient to begin developing the Plan as soon as possible. The Plan outlined in the grant proposal is a good start. Development of a CEP is an eligible and appropriate "pre-award" activity, and the City of Gautier plans to start work on Plan development as soon as possible during the 90 days prior to the October 1st award date.

Specifically, the City of Gautier has chosen a path of community involvement that began with a PowerPoint presentation at a City Council meeting to inform the community of the City's intention to seek EPA assistance through a Brownfields Assessment Grant and to begin the engagement process. The City of Gautier also posted a Brownfields Fact Sheet on its social media site, and the Mayor filmed a TV news interview at a closed service station. The City will continue to utilize these media to reach the public. Gautier will continue to provide routine updates concerning project progress during City Council meetings. The City of Gautier website will allow for public participation for anyone with computer access. Newsletters, fact sheets, web postings, e-mail distribution list updates, and media announcements will provide the public with information and encourage comments by the community. Presentations at four community meetings are planned to gather public input (i.e., Gautier Business Association meetings, Gautier Pride meetings, Rotary meetings, neighborhood association meetings, or faith based community meetings). The City will provide outreach materials in Spanish for the Spanish-speaking segment of the population. The City's Brownfields Program will implement environmental justice (fair treatment and meaningful involvement of all people regardless of race/color/national origin or income). A primary outcome of the City's Brownfields Program will be to implement environmental justice through the brownfields redevelopment in historically underserved low-income areas. The Brownfields Program will identify redevelopment opportunities in these areas to provide direct benefits to residents and business owners. The City's Brownfields Program will support community-based and community-driven brownfields redevelopment projects.

In addition, the City of Gautier plans to seat an Advisory Board to help ensure that public concerns are addressed. Several community-based organizations, businesses, and residents have already volunteered to serve in this capacity. Contact was made during the application process with representatives of the Mississippi Sandhill Crane National Wildlife Refuge in Gautier, the nearby Pascagoula River Audubon Center, Jackson County Economic Development Foundation, the Mississippi Department of Environmental Quality, Gautier Pride, the Jackson County Chamber of Commerce and other important organized stakeholders to ensure that community involvement is effective and achieves the best results for the City of Gautier. The City also hopes to recruit students from the MS Gulf Coast Community College to assist in outreach activities. These avenues of outreach will help ensure public participation. The community is engaged and their continued support will be led by numerous outreach activities, public interchanges, and stakeholder participation.

Community engagement (including a public meeting) is required if the City of Gautier develops a draft or final Analysis of Brownfields Cleanup Alternatives (ABCA) under this grant and intends to use the ABCA in applying for future Brownfields Cleanup agreements.

The City of Gautier will contact our EPA Project Officer for further guidance on developing the CEP.

Task 2 will be conducted by: City of Gautier's Grants & Projects Manager, Patty Huffman will be responsible for ensuring that each of the activities listed in Task 2 Community Involvement/Engagement are completed in a timely manner with assistance from other team members as needed.

TASK 3 ASSESSMENTS OF TARGETED PROPERTIES

This section of the work plan will outline the City of Gautier's plans for identifying properties and conducting assessments. This section will 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 one or more Phase II ESAs. This cycle can repeat as funds allow. The City of Gautier may also opt to conduct site specific cleanup planning and other eligible activities as needed.

The City of Gautier understands that the FY 2014 Brownfields Assessment Programmatic Terms and Conditions dictate that 35% of the City's awarded funds must be expended on eligible activities no less than 18 months after the project start date. Historically, Cooperative Agreement Recipients performing at a slower pace have had difficulty expending the designated cooperative agreement funds before the end of the project period.

A. Site Inventory and Prioritization [Community-Wide Only]:

The community engagement phase will be used to identify potential sites and to prioritize these sites, if needed. The Project Team will gather information from database searches and public input through community meetings and advisory group meetings. The site selection process will identify an inventory of potential sites. New sites will be added to the inventory whenever they are identified even toward the end of the cooperative agreement period. At the close of the grant, all potential sites are inventoried. Sites will be prioritized based on potential environmental impact, potential for timely reuse, and economic impact of redevelopment.

B. Site Characterization – Phase I Assessment:

It is anticipated that most of the sites making up the site inventory will be identified during the first six months of the Cooperative Agreement period. A series of goals will be set for site selection with at least ten (10) sites identified, access acquired if necessary, and assessments initiated within the first eight months. An additional ten (10) sites will be identified and work initiated after sixteen months, if a sufficient number of sites is not identified in the first round.

Inventory of Regulatory Listed Sites - Environmental database searches of potential hazardous substance and petroleum products sites will be conducted for the entire City. These database searches will consist of research of all regulatory lists and will be consistent with database research conducted as a part of the normal ASTM Designation E1527-05 Phase I Environmental Site Assessment. The purpose of this research is to establish the number and type of potential hazardous substance and petroleum product brownfield sites within the City. This task will also assist all stakeholders in determining which properties within these areas should be targeted for Phase I, Phase II and additional site assessment activities. The inventory will set a baseline of hazardous substance and petroleum product sites within Gautier that can be measured. This task is a critical part of the community involvement and outreach/education program to be developed under this grant; additionally, the City will seek input from the public and community-

based organizations on other potential brownfields.

EPA requires that all sites assessed with EPA Cooperative Agreement funds meet the All Appropriate Inquiry (AAI) standards established in the Brownfields Law (see the FY 2014 Brownfields Assessment Terms and Conditions). The City will complete the AAI Reporting Requirements Checklist (Attachment 4) for each AAI conducted with Brownfields grant funds.

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. The City will keep this in mind when developing the overall site strategy and will adhere to the AAI standards.

C. Candidate Site Eligibility: Prior to spending any funds for Phase II ESAs for community-wide grants, the City of Gautier will submit an EPA Region 4 Site Eligibility Determination Outline to the EPA Project Officer and *receive EPA approval*. The City will complete a hazardous SED and obtain EPA approval for a site believed to be contaminated with **hazardous substances**; the City will request a petroleum site eligibility determination from its designated State official and obtain approval for sites that are believed to be contaminated with **petroleum**. This may involve judgment calls for sites believed to be contaminated with both hazardous substances and petroleum. The City may consult our EPA Project Officer for clarification; however, below are the guidelines for such commingled sites:

- A commingled site at which the City has reason to believe only *de minimus* petroleum exists must be processed using the hazardous substances eligibility screening only. The City is required to charge activities against hazardous funds only.
- A commingled site at which the City has 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 City 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 City is required to charge activities against petroleum funds only.

Useful link for site eligibility forms:

<http://www.epa.gov/region4/rcra/bflr/documents/eligibilityscreensiteassess.doc>

Site Access: The City will obtain EPA site eligibility determination approval and site access prior to expending any funds on a given site. The City will plan accordingly to negotiate site access.

D. Site Characterization – Phase II Assessment: Once EPA has determined the site to be eligible, phase II assessment activities can begin. Phase II assessments must have access agreements to be performed. Only willing participants will have phase II assessments. Sites for Phase II assessment will also be prioritized based on environmental impact, potential for timely reuse, and economic impact of redevelopment. No site sampling will be conducted until the QAPP is approved. If there are more potential cleanup sites, this prioritization may identify more sites for phase II assessment than there are grant funds to assess. The first 2 Phase II assessments will be identified and initiated 10 months after beginning assessment activities. The third Phase II assessment will be initiated 15 months after the grant award. It is anticipated that one generic QAPP will be completed by the 7th month and one site specific QAPP will be completed by month 9. A total of four site specific QAPPs is planned. No QAPPs will be submitted after month 30.

- a. **ESA, NHPA and Clean Water Act Section 404 Permitting:** EPA has certain requirements related to the Endangered Species Act (ESA), National Historic Preservation Act (NHPA), and Clean Water Act Section 404 which must be met before EPA gives approval to proceed with field work under the Cooperative Agreement (see FY 2014 Brownfields Programmatic Assessment Terms and Conditions). Therefore, the City must provide EPA with information on the location of the project; any threatened or endangered species or habitat which may be affected by the project; whether the site is considered to be of concern by the State Historic Preservation officer; and, a list of Tribes who may believe the site or project could disturb cultural resources. The City must also identify if there are any waters subject to Clean Water Act Section 404 that may be affected by the project.

NOTE: This may be particularly relevant during cleanup planning.

- b. **Quality Assurance Project Plans (QAPPs):** Prior to undertaking ANY sampling on site, the CAR shall prepare and submit a Quality Assurance Project Plan (QAPP). QAPP approval by EPA is required prior to sample collection. The QAPP should be consistent with the EPA Region 4 “*Interim Generic & Site Specific Quality Assurance Project Plan Guidance for Brownfield Site Assessments and/or Cleanups,*” July 2010, and later revisions (see FY 2014 Brownfields Terms and Conditions). Request the QAPP instructions from your EPA Project Officer. [*Note: costs incurred for sampling performed without an approved QAPP are not eligible for reimbursement.*]

NOTE: There are different requirements for the assessment of lead based paint and asbestos. See the QAPP guidance for more information.

- c. **Health & Safety Plans:** The City must also prepare and follow an OSHA-compliant Health and Safety Plan (HASP), and place a copy in

the Cooperative Agreement file. The City 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 be conducted by: City of Gautier's Economic Development & Planning Director, Chandra Nicholson, P.E. will be responsible for ensuring that the activities listed in Task 3 Assessments of Targeted Properties are completed in a timely manner by the environmental consultant.

TASK 4 CLEANUP PLANNING AND INSTITUTIONAL CONTROLS

This section of the work plan should outline the City's plans for cleanup planning and identifying any institutional controls that may be needed. The City 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. The ABCA is also a useful communication tool for the public and such input into the cleanup is recommended. Review by the State Brownfields or VCP project manager will help ensure that our cleanup plans will ultimately be acceptable to the State.

The ABCA or its equivalent generally should include*:

- 1) Information about the site and contamination issues (i.e. exposure pathways, identification of contaminants, contaminant levels and contaminant sources, source volume or 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; and
- 7) A selected or proposed alternative, noting any engineering controls.

* NOTE: State requirements may differ.

The City will consult with our EPA Project Officer for an example, if needed.

Institutional controls (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 requires no further action, for some sites, 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. The City will anticipate multiple IC jurisdictions and the associated timing requirements in our cleanup planning schedule. We will work closely with the State for the approvals.

Most activities for evaluating cleanup alternatives will be completed and findings provided during the last two years of the project. The City of Gautier plans to develop four (4) ABCA documents at two (2) hazardous substance sites and two (2) petroleum sites. These plans will identify the exposure pathways of concern, site specific contaminants and locations and levels as compared to screening values utilized by EPA and the State of Mississippi. These sites will be discussed with Mississippi DEQ to ensure that their input is included in the consideration of remedial options. Based on the information provided in the Phase II assessments, a variety of remedial options will be considered to help identify potential remedial approaches for each of the four sites. While these documents will not include information concerning public perceptions about the cleanup process, it will be a starting point for consideration of the cleanup processes available for consideration for each of the four sites. These documents will be a valuable tool in moving each of the respective sites forward toward reuse. The ABCAs will document the potential for exposure from various constituents at the sites so that any necessary steps can be reasonably made to limit exposure. For example, prior to cleanup, certain institutional controls may be recommended to curtail groundwater use near a contaminated site. Limiting access to areas that are contaminated may also be recommended. Useful link: http://www.epa.gov/brownfields/tools/tti_lucs.htm.

Task 4 will be conducted by: City of Gautier's Economic Development & Planning Director, Chandra Nicholson, P.E. will be responsible for ensuring that the activities listed in Task 4 Cleanup Planning and Institutional Controls are completed in a timely manner by the environmental consultant.

TASK 5 PUBLIC HEALTH INITIATIVE

Develop a public health initiative for identifying priority health issues that may be related to Brownfield sites and then following up with review of these assessments to determine which sites have the greatest concern from health perspectives. The City has budgeted \$5,000 from hazardous substances funding and \$5,000 from petroleum product contamination funds for this work. The City will coordinate with the Jackson County Health Department/State Health Department to evaluate and provide input on site selections and to identify health issues that may be site related. This work is envisioned as evaluating assessment results from a health perspective and evaluating which sites may be of higher priority for cleanup from a health perspective.

Task 5 will be conducted by: City of Gautier's Economic Development & Planning Director, Chandra Nicholson, P.E. along with other members of the team will be responsible for ensuring that the activities listed in Task 5, if needed, are completed in a timely manner.

3.0 DETAILED SCHEDULE DEVELOPMENT (Attachment 1)

Attachment 1 provides a detailed guideline for schedule development. Several tasks run concurrently. For that reason, a Gantt chart or some other scheduling software tool will help make the schedule into a useful visual aid as well. The City will include sufficient time for management or governing board approvals as may be necessary at critical points in the project. Schedule development will be discussed with the EPA project officer.

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.

Time from Notice of Selection	Actions	√
Grant Commitment and Planning Phase		
0 month	Notice of Selection, May 27, 2014; Application Forms Webinar attended June 11 2014	
3 weeks	Grant Application Submitted with Draft Work Plan and detailed schedule by July 2, 2014 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 Project Officer prior approval) City Council authorization to advertise a consultant RFP given on July 1, 2014 Advertise a consultant RFP in July 2014	
2 months	EPA works with CAR to finalize draft work plan (by August 1, 2014)	
3-4 months	EPA executes grant award Consultant contract approved by City Council & executed and contractor on-board Begin work on Community Engagement Plan	
Oct. 7-9, 2014	New Grantee Orientation in Atlanta, GA	

Time from Grant Award	Actions	√
Planning	Startup	
	0 months	Grant award
	0-3 months	Request for Proposal (RFP) for contractor procurement is finalized (only if not completed pre-award)
	1 - 4 months	Kick-off meeting held with CAR, Contractor, EPA, State First Meeting with Community, Complete Community Engagement Plan
Grant Specific Schedule		
Year 1	4 months	Quarterly Report 1 is due January 30, 2015 (30 days after 1 st quarter ends) Reimbursement Request Submitted
	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	Community-wide grant recipients develop generic QAPP (concurrent with 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	Quarterly Report 2 is due April 30, 2015 (30 days after 2 nd quarter ends) Reimbursement Request Submitted		
	7 months	Submit projections to EPA for Phase I & Phase II ESAs for the next year		
	8 – 9 months	Submit site eligibility forms to EPA/State (for petroleum sites); obtain site access		
	9 months	Site specific QAPP(s) submitted to EPA/State for each property (allow 2 weeks for approval)		
	10 months	Quarterly Report 3 is due July 30, 2015 (30 days after 3 rd quarter ends) Reimbursement Request Submitted		
	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	Assess status to ensure work is on target to meet set year end goals, if not inform PO as soon as possible in writing		
	Year 2	13 months	Quarterly Report 4 is due October 30, 2015 (30 days after 4 th quarter ends)	
		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	
		16 months	Quarterly Report 5 is due January 30, 2016 (30 days after 5 th quarter ends) Reimbursement Request Submitted	
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		Quarterly Report 6 is due April 30, 2016 (30 days after 6 th quarter ends) Reimbursement Request Submitted		
19 months		Submit projections to EPA for Phase I & IIs for the next year		
22 months		Quarterly Report 7 is due July 30, 2016 (30 days after 7 th quarter ends) Reimbursement Request Submitted		
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)		
		25 months	Quarterly Report 8 is due October 30, 2016 (30 days after 8 th quarter ends) Reimbursement Request Submitted Disadvantaged Business Enterprise (DBE) due with this quarterly	
	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	Quarterly Report 9 is due January 30, 2017 (30 days after 9 th quarter ends) Reimbursement Request Submitted		
	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		

Year 3	31 months	Quarterly Report 10 is due April 30, 2017 (30 days after 10 th quarter ends) Reimbursement Request Submitted	
	34 months	Quarterly Report 11 is due July 30, 2017 (30 days after 11 th quarter ends) Reimbursement Request Submitted	
	35 month	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, 2017 (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, 2017. 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 Close-out documentation and final deliverables due within 90 days after project end date (December 30, 2017)	

- 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 Tables for Work Plan Tasks

Hazardous Substances Budget Categories	Project Tasks					
	Task 1 Project Management & Reporting	Task 2 Community Involvement/ Engagement	Task 3 Assessment	Task 4 Cleanup Planning	Task 5 Public Health Initiative	Total
(Programmatic Costs Only)						
Personnel	\$5,977.50	\$2,128.00	\$0.00	\$0.00	\$0.00	\$8,105.50
Fringe Benefits	\$1,395.50	\$521.50	\$0.00	\$0.00	\$0.00	\$1,917.00
Travel ¹	\$2,102.50	\$125.00	\$0.00	\$0.00	\$0.00	\$2,227.50
Equipment ²	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Supplies	\$2,100.00	\$150.00	\$0.00	\$0.00	\$0.00	\$2,250.00
Contractual ³	\$11,000.00	\$2,500.00	\$153,000.00	\$14,000.00	\$0.00	\$180,500.00
Other – Health Dept.	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Total	\$22,575.50	\$5,424.50	\$153,000.00	\$14,000.00	\$5,000.00	\$200,000.00

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

² EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies.

³ Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48.

Petroleum Budget Categories	Project Tasks					
	Task 1 Project Management & Reporting	Task 2 Community Involvement/ Engagement	Task 3 Assessment	Task 4 Cleanup Planning	Task 5 Public Health Initiative	Total
(Programmatic Costs Only)						
Personnel	\$5,977.50	\$2,128.00	\$0.00	\$0.00	\$0.00	\$8,105.50
Fringe Benefits	\$1,395.50	\$521.50	\$0.00	\$0.00	\$0.00	\$1,917.00
Travel ¹	\$2,102.50	\$125.00	\$0.00	\$0.00	\$0.00	\$2,227.50
Equipment ²	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Supplies	\$2,100.00	\$150.00	\$0.00	\$0.00	\$0.00	\$2,250.00
Contractual ³	\$11,000.00	\$2,500.00	\$153,000.00	\$14,000.00	\$0.00	\$180,500.00
Other – Health Dept.	\$0.00	\$0.00	\$0.00	\$0.00	\$5,000.00	\$5,000.00
Total	\$22,575.50	\$5,424.50	\$153,000.00	\$14,000.00	\$5,000.00	\$200,000.00

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³ Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48.

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 of AAI final rule and §12.7 of ASTM E1527-05), 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 E1527-05, 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

Attachment 5: Example Quarterly Reporting Template – Assessment

CAR Name: City of Gautier, MS Cooperative Agreement Number: Date Submitted: Quarterly Report Number:			
Task 1: Project Management and Reporting			
Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date ^a	Lead Party
A. Assemble internal team, including technical, financial, managerial. Establish project schedule.	Team established, agreement written.	Qtr. 1	PM, team
B. Prepare bid documents for procuring contractor support.	Schedule developed.	Qtr. 1	PM
C. Select contractor.	Bid package complete.	Qtr. 1	PM
D. Kick-off meeting held.	Contractor selected	Qtr. 2	Team
E. Grant Project Reporting and Performance Evaluation:	Kick-off meeting complete		PM
a. Quarterly Progress Reports to EPA & State	Quarterly Progress Reports (10 days after end of qtr.)		PM, team
b. Final Grant Reporting	Final Report		PM, GPM
F. Attend Regional & National Brownfields workshops	(90 days after grant)		
Cost Estimates for Task 1:			
Actual Accomplishments and Progress Reporting for <i>(fill in the blank)</i> Reporting Period: <i>Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.</i>			

CAR Name: City of Gautier, MS Cooperative Agreement Number: Date Submitted: Quarterly Report Number:			
Task 2: Community Involvement/Engagement			
Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date	Lead Party
A. Setup Information Repository for Public Information	Files made publicly available.	Qtr. 1	PM, team
B. Detailed demographic assessment	Assessment complete, part of Plan.	Qtr. 1	Team
C. Community Engagement Plan Developed	Plan complete.	Qtr. 1	Contractor
D. Media, Electronic & Social Networking Systems Updated	Radio, TV, flyers newspaper, etc.	Every Qtr.	Team

^a The project schedule needs to be more detailed and specific than the overall completion quarter represented here.

E. Meetings to describe project/schedule and/or updates Kick-off meeting Update after Phase I Update after Phase II Project completion with ABCA	Meetings conducted.	Qtrs.: 2, 4, 8, 10	PM, Team
Cost Estimates for Task 2: (include cost estimates here)			
Actual Accomplishments and Progress Reporting for <i>(fill in the blank)</i> period: <i>Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.</i>			

CAR Name: City of Gautier, MS Cooperative Agreement Number: Date Submitted: Quarterly Report Number:			
Task 3: Assessments of Targeted Sites			
Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date	Lead Party
A. Site Inventory	Inventory List	By 3 rd Qtr.	Contractor
B. Characterization (Phase I, Phase II) Ongoing	Reports (25 sites)	Quarterly	Contractor
C. Generic QAPP	Report	By Qtr. 4	Contractor
D. Site Specific QAPPs	Report	By Qtr. 4	Contractor
Cost Estimates for Task 3: (include cost estimates here)			
Actual Accomplishments and Progress Reporting for <i>(fill in the blank)</i> period: <i>Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.</i>			

CAR Name: City of Gautier, MS Cooperative Agreement Number: Date Submitted: Quarterly Report Number:			
Task 4: Cleanup Planning and Institutional Controls			
Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date	Lead Party
A. ABCAs	ABCAs completed	Year 2	Contractor
B.			
C.			

Cost Estimates for Task 4: (include cost estimates here)			
Actual Accomplishments and Progress Reporting for <i>(fill in the blank)</i> period: <i>Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.</i>			

CAR Name: City of Gautier, MS Cooperative Agreement Number: Date Submitted: Quarterly Report Number:			
Task 5: Public Health Initiative			
Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date	Lead Party
A. Initiate discussion with Jackson County Health Dept. regarding contractual services related to site selection and evaluating assessment results	Contact Made	Qtr. 1	PM, team
B. Agreement signed with Health Dept. to perform services above.	Contract	Qtr. 2	PM
C. Health Dept. reports received	Reports	Quarterly	HD
Cost Estimates for Task 5: (include cost estimates here) \$10,000 contractual fee			
Actual Accomplishments and Progress Reporting for <i>(fill in the blank)</i> period: <i>Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.</i>			

Budget:

Budget updates template included here is for quarterly reporting only. SF424 budget forms suffice for final work plan budget documentation. Community-wide quarterly budget reporting must be site-specific (separate from this chart).

Hazardous Substance Budget				
Budget Update:				
Expense Category	Current Approved Budget (from work plan)	Costs Incurred This Quarter	Costs Incurred To Date	Total Funds Remaining
Personnel	\$10,022.50			
Travel	\$2,227.50			
Equipment	\$0.00			
Supplies	\$2,250.00			
Contractual	\$180,500.00			
Other	\$5,000.00			
Total	\$200,000.00			

Petroleum Substance Budget				
Budget Update:				
Expense Category	Current Approved Budget (from work plan)*	Costs Incurred This Quarter	Costs Incurred To Date	Total Funds Remaining
Personnel	\$10,022.50			
Travel	\$2,227.50			
Equipment	\$0.00			
Supplies	\$2,250.00			
Contractual	\$180,500.00			
Other	\$5,000.00			
Total	\$200,000.00			

Site Specific Community-Wide Quarterly Budget Summary:

Site Name	Current Quarter Costs	Cumulative Costs Incurred to Date