



WHITE MOUNTAIN APACHE HOUSING AUTHORITY

PO BOX 1270 - WHITERIVER, ARIZONA 85941 - PHONE (928) 338 - 4831 - FAX (928) 338 - 4835

1. Applicant Identification
White Mountain Apache Housing Authority
PO Box 1270
50 West Chinatown
Whiteriver, Arizona 85941-1270
2. Funding Requested
 - a. Grant Type: Multipurpose
 - b. Amount Requested: \$800,000
 - c. Contamination Type: Hazardous Substances
3. Location
White Mountain Apache Reservation, Apache, Gila, and Navajo Counties, Arizona
4. Contacts
 - a. Project Director
Bernadette Clarkson, Environmental Compliance/Brownfields Coordinator
White Mountain Apache Housing Authority
PO Box 1270
50 West Chinatown
Whiteriver, Arizona 85941-1270
(928) 338-4831
bclarkson@wmaha.com
 - b. Chief Executive/Highest Ranking Elected Official
Victor Velasquez, Executive Director
White Mountain Apache Housing Authority
PO Box 1270
50 West Chinatown
Whiteriver, Arizona 85941-1270
(928) 338-4831
vvelasquez@wmaha.com
5. Population
15,313
6. Other Factors Checklist

Other Factors	Page #
Community Population is 10,000 or less.	
The applicant is, or will assist a federally recognized Indian Tribe or United States territory.	1
The priority brownfield site(s) is impacted by mine scarred land.	
The priority site(s) is adjacent to a body of water(i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughway separating them).	

The priority site(s) is in a federally designated floodplain.	
The redevelopment of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	
At least 20% of the overall project budget will be spent on eligible site reuse or area-wide planning activities for priority brownfield site(s) within the target area.	

7. Letter from State or Tribal Environmental Authority
WMAHA received letters from Brenda Begay, Manager, White Mountain Apache Tribe, Environmental Protection Office and Travis Barnum, Brownfields Coordinator, Arizona Department of Environmental Quality. These letters are attached to this application,



Douglas A. Ducey
Governor

ARIZONA DEPARTMENT OF ENVIRONMENTAL QUALITY



Misael Cabrera
Director

January 29, 2019
VRP19-143

White Mountain Apache Housing Authority
Attention: Victor Velasquez
PO Box 1270,
Whiteriver, AZ 85941

Re: Letter of Support for the White Mountain Apache Housing Authority Multi-Purpose
Brownfields Grant

Dear Mr. Velasquez,

The Arizona Department of Environmental Quality (ADEQ) Brownfields Program is pleased to provide a letter of support for the White Mountain Apache Housing Authority (WMAHA) Multi-Purpose Brownfields Grant application to the Environmental Protection Agency (EPA) for the assessment of hazardous substances in the White Mountain Apache Tribal lands. This will include conducting property inventories, planning, and Phase I and/or Phase II Environmental Site Assessments in your community.

ADEQ understands with this funding WMAHA will be able to address the leftover effects of clandestine drug labs that manufacture methamphetamine (crystal meth). Priority Brownfields sites for this Multi-Purpose Grant are homes that have become uninhabitable and unavailable to low-income families due to contamination from methamphetamine production. WMAHA has identified 48 homes throughout the community that are currently boarded up and over 113 more that are known to be impacted by methamphetamine. These abandoned homes attract illicit activity, including additional methamphetamine production, and remain dangers to the community. The grant will be used to conduct community outreach and notification; conduct assessment and post-remediation sampling; oversee remediation; collect soil, asbestos-containing materials, lead-based paint, septic system content, and air samples.

ADEQ fully supports the WMAHA and their community with this important Brownfields project and we look forward to providing the community with additional services and funding opportunities as needed.

Sincerely,

Travis Barnum, Brownfields Coordinator
Waste Program Division

Main Office

1110 W. Washington Street • Phoenix, AZ 85007
(602) 771-2300

Southern Regional Office

400 W. Congress Street • Suite 433 • Tucson, AZ 85701
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1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. TARGET AREA AND BROWNFIELDS

i. Background and Description of Target Area

The Fort Apache Reservation covers over 1.6 million acres in portions of Apache, Gila, and Navajo Counties in east-central Arizona. It is the ancestral homeland of the White Mountain Apache Tribe (WMAT), a Federally-recognized Indian Tribe whose members are direct descendants of people who have occupied this land for centuries and have strong ties to this homeland. The Fort Apache Reservation has a population of 15,313¹. Over 95% of the residents of the Fort Apache Reservation are members of the WMAT, who face significant economic, health, and environmental challenges. The poverty rate for all families is 40.5%. The median household income is \$26,120 (compared to the national average of \$57,652), and almost half the population uses Supplemental Nutrition Assistance Program (SNAP) benefits. The unemployment rate is 36.4%, almost nine times the national average. There are slightly more than 4,000 housing units, of which 60% are owner-occupied and 16% are vacant.²

The WMAT Tribal Council established the White Mountain Apache Housing Authority (WMAHA) in 1963 with the mission to provide safe, decent, and affordable housing to Tribal members within the Fort Apache Reservation who face income or other life challenges. The WMAHA has over 1,200 low-income housing units available to its members, but due to the extraordinary economic challenges facing these families, has a waiting list of 1,800 individuals who are seeking safe and affordable housing.

As far back as 2006, the WMAT knew it had a major problem with methamphetamine use. In fact, in May 2006, the White Mountain Apache Tribe testified in front of the Senate Indian Affairs Committee that 30% of their Tribal employees recently tested positive for methamphetamine use.³ This was particularly disturbing because Tribal employees are often the community leaders and the number is actually believed to be an underestimate of use.

Over the last 10 years, prevalence of clandestine methamphetamine labs has escalated and become a social, economic, and public health issue on the reservation. In our community, methamphetamine is usually produced by extracting cold medicines and synthesizing the product with various toxic, caustic, corrosive, flammable, and explosive mixtures. Dangerous residual chemicals from the methamphetamine manufacturing process are dispersed throughout the house and remain in carpet, walls, furniture, drapes, air ducts, and the air where they pose a serious and potentially lethal health and safety danger. Consequently, when a meth-impacted house is discovered, the family is displaced and the temporarily uninhabitable house is either remediated or demolished. In addition, about 3 to 6 pounds of hazardous waste results from every 1 pound of meth produced⁴; this hazardous waste is abandoned in homes or illegally disposed in rivers or forests throughout the community.

ii. Description of the Priority Brownfields Site(s)

Congress made properties contaminated by controlled substances such as methamphetamine eligible for Brownfields funding because of growing national concern with the health and environmental

¹ 2013-2017 American Community Survey 5-Year Estimates

² 2013-2017 American Community Survey 5-Year Estimates

³ Vigil, Donna, Director, Division of Health Programs, White Mountain Apache Tribe. Oral testimony offered to the U.S. Senate Committee on Indian Affairs. "Hearing: Indian Youth Suicide." (May 17, 2006).

⁴ Owens, Clyde V., Mason, Mark M., Marr, David; Remediation of Manufactured Methamphetamine in Clandestine Laboratories. A Literature Review; <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC6262873/>

impacts of clandestine methamphetamine labs. Priority Brownfields sites for this Multi-Purpose Grant are homes that have become uninhabitable and unavailable to low-income families due to contamination from methamphetamine production or use (currently known or to be identified through the use of Brownfields Multi-Purpose Grant funding). The WMAHA has identified 48 homes throughout the community that are currently boarded up and over 113 more that are known to be impacted by methamphetamine. We anticipate 180 priority Brownfields sites will be assessed, and 115 residences will be remediated and redeveloped using this Brownfields Multi-Purpose grant. These abandoned homes attract illicit activity, including additional methamphetamine production, and remain dangers to the community. In addition, for every residence that is deemed uninhabitable due to dangerous and potentially lethal conditions, a family is displaced and a potential home for a family in need is not available.

Known contamination at these sites include hazardous wastes (building materials and residual waste that display one or more of the characteristics of toxicity, flammability, corrosivity, and ignitability), non-hazardous wastes, and secondary remediation wastes containing asbestos or lead-based paint. The Brownfields sites meet the Multi-Purpose threshold criteria because they are and have always been owned by the WMAHA and WMAHA is not responsible for the contamination.

b. REVITALIZATION OF THE TARGET AREA

i. Overall Plan for Revitalization

The overall plan for revitalization centers on assessing at least 180 temporarily-unavailable, methamphetamine-contaminated homes on the Fort Apache Reservation and returning at least 115 of these homes to beneficial use for our Tribal members. These abandoned, boarded-up homes are nuisances that attract additional drug use and manufacturing, trash, graffiti, loitering, and other criminal or disruptive activities. The negative impacts from even one house spreads throughout the surrounding neighborhood and causes further deterioration of the neighborhood.

ii. Outcomes and Benefits of Overall Plan for Revitalization

WMAHA has identified well over 100 residences that are either unsafe for habitation or that have been identified as impacted by methamphetamine. The Brownfields (methamphetamine-impacted residence and properties) once discovered and boarded-up are not only a blight within the neighborhood they are located but also a magnet for illicit activities beyond the eyes of neighbors and law enforcement. The abandoned Brownfields residences continue to be a danger as they become unsafe and uncared for. The neighborhoods suffer, the community suffers, and the methamphetamine epidemic continues.

Assessment and remediation necessary to transform these Brownfields sites into a healthy and safe environment again for needy families gives these families an affordable place to live, it removes blight and dangerous conditions, and allows the WMAHA to collect revenue and potential tax benefits to allow them to expand on other programs to assist the community.

c. STRATEGY FOR LEVERAGING RESOURCES

i. Resources Needed for Site Reuse

Over the past 2 years, the WMAHA has expended almost \$300,000 from its general budget to remediate methamphetamine-impacted houses, and numerous internal resources (personnel, supplies, etc.) to manage methamphetamine-related programs. As a result, much of our budget and time has been diverted to addressing this problem and not on other issues that could address other social and economic issues such as lack of employment options and economic diversity. For example, one of the largest

employers, the Fort Apache Timber Company (FATCO), has been facing financial trouble due to several, highly-destructive forest fires likely resulting from global warming. This has resulted in employee cutbacks not only within the company, but with several other companies that support FATCO.

The WMAHA has identified 48 homes throughout the community that are currently boarded up and over 113 more that are known to be impacted by methamphetamine in a community where there is a waiting list of over 1,800 individuals and families awaiting safe and decent homes. This Multi-Purpose grant will allow us to bring a majority of these homes back to beneficial use and will likely prevent generation of additional methamphetamine-impact homes. In addition to revitalized Brownfields and neighborhoods, the homes will be an important step in allowing our community members to focus on equally-important issues such as employment and economic invigoration.

ii. Reuse of Existing Infrastructure

Returning the Brownfields residences to full and beneficial reuse is the primary goal of the methamphetamine remediation program. This Multi-Purpose Grant is the primary catalyst in the WMAHA's plan to allow for transforming the boarded up Brownfields into a viable homes for community members in need. We assume approximately 180 houses will be assessed and 115 will be remediated and made safe for needy Tribal families, the majority made up that have older adults and children. In addition to these Brownfields residential properties, existing infrastructure that is currently not being used to the fullest potential includes streets, water/wastewater, power, and community amenities such as parks. The reuse by Tribal families allows for stronger neighborhoods, a safer community, and another step in fighting the ravages of Methamphetamine on the community. Additional infrastructure will not be needed to implement the revitalization plans.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. COMMUNITY NEED

i. The Community's Need for Funding

As stated previously, the Fort Apache Reservation population is 15,313 of which over 40% of the families live below the poverty line and over one-third are unemployed. Our small, resource-limited Tribe struggles to meet the basic needs of our members and has very little discretionary funding. As an example, the Tribe can afford to employ only 24 Reservation police to patrol our 2,628 square mile reservation. Restoration of methamphetamine-contaminated residences takes up a very high percentage of our resources, but because of its importance, we have expended a significant amount of our funding resources for testing and cleanup of 53 WMAHA-owned residences that were discovered to be impacted by methamphetamine in the last 2 years. We have used an additional \$600,000 in EPA Brownfields Cleanup grant funding to remediate an additional 33 residences, but still have many other residences that cannot be used due to health and safety concerns.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Almost all residents of the Fort Apache Reservation can be considered to be members of a sensitive population and, because of the prevalence of illicit drug labs, may have been unknowingly exposed to the dangers of these labs. Methamphetamine can cause a variety of cardiovascular problems, including rapid heart rate, irregular heartbeat, and increased blood pressure. Hyperthermia (elevated body temperature) and convulsions may occur with methamphetamine overdose, and if not treated immediately, can result in death. Long-term effects include psychosis, changes in brain structure and function, deficits in thinking

and motor skills, increased distractibility, memory loss, aggressive or violent behavior, mood disturbances, severe dental problems, and weight loss.⁵

Children are especially vulnerable to the acute health and safety risks associated with methamphetamine-contaminated houses. Children are more vulnerable because of their higher metabolic and respiratory rates; developing central nervous system; and their behaviors (such as frequent hand-to-mouth contact and physical contact with their environment) increase the likelihood that they will inhale, absorb, or ingest toxic chemicals, drugs, or contaminated food. Exposure to ongoing environmental exposures from methamphetamine and its precursors before birth places infants at increased risk for neurological abnormalities and respiratory problems. Children may also have a special vulnerability to certain harmful materials that may be present during methamphetamine lab remediation activities, including lead, asbestos, and mercury.

Most people involved in the manufacture of methamphetamine also abuse the drug. As a result, their behavior can be unpredictable unpredictable, abusive, or negligent. Children usually bear the brunt of these behaviors, and are exposed to physical dangers not only from direct exposure to the hazardous chemicals, but also to fire and explosions; filthy and unsanitary living conditions; and physical, mental, and sexual abuse.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

Our community faces significant challenges due to high rates of poverty and unemployment, which have directly contributed to chronic diseases, alcoholism, illicit drug use, suicide, and teen pregnancy. The stark reality is that over 80% of our community members die prematurely, and the infant mortality rate is about three times greater than that of the general Arizona population. The leading cause of death for persons aged 20 to 64 on the Fort Apache Reservation is alcoholic liver disease.⁶ Statistics are not available specifically for the WMAT, but Native Americans in general have about a 14% incidence rate of drug addiction and about 80% of individuals who abuse alcohol also abuse drugs.⁷ It is likely that these statistics are valid within the WMAT and that methamphetamine is one of the primary culprits.

The WMAT has tried to help our people to fight back against these issues, including efforts such as community outreach, increased law enforcement, and cleanup of drug labs using Brownfields funding. However, we have limited and insufficient resources. There are no hospitals or skilled nursing facilities on the reservation, and Indian Health Services (IHS) on the Fort Apache Reservation has limited health and treatment resources which are already overburdened with other issues within the community. This problem is amplified because as law enforcement or intervention efforts increase, there are insufficient treatment resources to absorb or address the increase in individuals wishing to obtain assistance. Furthermore, methamphetamine addiction is substantially more costly than other addiction treatments and takes substantially longer.

Assessment, cleanup, and future prevention of these drug labs can directly reduce disease and adverse health by attacking the root causes contributing to these conditions. First, it can help eliminate the source

⁵ National Institute of Drug Abuse; Research Report Series – Methamphetamine;
<https://www.drugabuse.gov/publications/research-reports/methamphetamine>

⁶ Arizona Department of Health Services, Bureau of Women’s and Children’s Health; *Statistical Profile – 2017, White Mountain Apache Tribe Primary Care Area (PCA)*; April 2018.

⁷ Substance Abuse and Mental Health Services Administration; *Behavioral Health Trends in the United States: Results from the 2014 National Survey on Drug Use and Health*; September 2015.

of methamphetamine, which is a drug of choice because it is relatively inexpensive, accessible, and easy to manufacture. Indirectly, it will also help provide decent housing for individuals and families, who can then focus on keeping or finding meaningful employment and living a healthier life.

(3) Economically Impoverished/Disproportionately Impacted Populations

By any measure, the WMAT is an economically-impooverished and disproportionately-impacted population. The poverty rate for families is 40.5% and jumps to 53.7% for families that have children under the age of 5 years. The median household income is \$26,120 (compared to the national average of \$57,652), and almost half the population (46.4%) supplements this extraordinarily low income with Supplemental Nutrition Assistance Program (SNAP) benefits. The unemployment rate is 36.4%, almost nine times the national average.

In its own description of Brownfields Cleanup grants, EPA states that the "Cleaning up and reinvesting in brownfields protects human health and the environment, reduces blight" and "to put previously contaminated properties back into productive use". This is exactly the mantra that the WMAHA is submitting the Cleanup Grant request for. The housing authority is overly taxed already with its efforts to help the WMAT community with all of the programs it is now responsible for.

There are no funds available from the WMAT to assist the housing authority due to the economic needs for other programs. The WMAT community position is such that funding through taxes or other means is out of the question due to high unemployment and people living in poverty in the community.

b. COMMUNITY ENGAGEMENT

i. Community Involvement

The WMAHA has conducted extensive community involvement to educate and engage the community, WMAT departments, and community organizations regarding our methamphetamine assessment and remediation program. The WMAHA, along with other WMAT departments and Indian Health Services, developed educational materials and tools that were broadcast through the local radio station and distributed to community organizations and members. The main goals of our program are to educate the community members on the signs of methamphetamine manufacturing and usage, the dangers of the drug, and how to properly and safely address these issues. Community partners who we have enlisted for community outreach and engagement include:

- Rainbow Treatment Center – Vangie Natan, Director
- Apache Behavioral Health – Evelyn Emery, Director
- Boys & Girls Club – Sundeigh Walker, Club Manager

In 2016, the WMAHA launched a Meth Awareness Team in response to a high rate of methamphetamine contamination among the 1,300 housing units it maintains across the reservation. Over 100 community members attended the first community meeting held in September 2016. The team's goals are networking with law enforcement, obtaining additional funding, providing drug education training, implementing harsher consequences for offenders, reviving Neighborhood Watch, educating the community on the dangers of methamphetamine, centralizing data collection, seeking confiscated drug money to clean up contaminated housing, and brainstorming with other regional housing authorities for solutions.

The WMAHA continues to reach out to the community members on addressing the illicit use and addiction to methamphetamine by addressing and educating them on the ways to correct this community issue.

We have held several community meetings and gone into the schools to address the dangers of methamphetamine and will continue to develop resources and educational materials while expanding upon our involvement in the community and local schools. Extensive public notification and engagement has been conducted by WMAHA during over the past year, as we have successfully remediated residences throughout the community using Fiscal Year 2017 Brownfields Cleanup funds.

The WMAHA also instituted a Resident Opportunity and Self Sufficiency (ROSS) Service Coordinator Program. The ROSS program uses supportive community organizations and services and activities to help WMAHA housing residents attain economic and housing self-sufficiency. Partnering with local organizations this program is another means used to educate the community by methamphetamine.

ii. Incorporating Community Input

The WMAT Tribal Council has made a strong commitment to enlisting not only WMAT departments, but also the community's support in fighting the methamphetamine problems. As a result, the WMAT Environmental Department has developed radio station programs and offered resources as needed. The WMAT Police Department has committed assistance with training programs, more officer involvement, and help with discovery and obliteration of the Methamphetamine issues. The Indian Health Services has offered services to include education, specifically in the schools and to tribal members on the dangers of Methamphetamine as well as helping the community in identifying the problems early and what to do to help members who accept that help. Other agencies that have offered full commitment and assistance as needed primarily through education of the community on the Cleanup Tasks for the Brownfields are the Rainbow Treatment Center, the Apache Behavioral Health Center, the Boys and Girls Club. The education will describe the tasks be completed and why as well as understanding what Methamphetamine addiction is and positive messages on how you can recognized and head off the addiction.

The WMAHA will continue their role in working with WMAT departments and Outreach programs developing partnerships with them as well as community members. The WMAHA in conjunction with many of the agencies and community groups has offered ways that these groups and community members can learn and better themselves to methamphetamine addiction. This alone will allow community members currently trapped the world of methamphetamine to become valuable living and productive members to their families and the community. The WMAHA is looking to expand its employee base to allow for the development of these educational outreach programs.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. DESCRIPTION OF TASKS AND ACTIVITIES

Task Descriptions

Task 1 - Planning and Preparation

Community Engagement Plan. WMAHA will update its existing Community Involvement Plan and outreach/promotional materials used to support its FY2017 Brownfields Cleanup grants. The plan identifies the community affected by this project and illustrates how WMAHA will encourage means of communication between residents and involved parties as the project progresses. In order to maximize the effectiveness of the Brownfield program and meet the needs of the community, the WMAHA has identified the following actions: continue to make the public aware of project activities, particularly stakeholders and community members who are encouraged to be involved in the project; identify and discuss the needs of the community in order to understand their concerns and vision for the project; and, establish a clear understanding throughout the community of project activities and outcome.

Assessment and Cleanup Plan. WMAHA will prepare an Assessment and Cleanup Plan using appropriate EPA and Arizona Department of Environmental Quality (ADEQ) guidelines for assessment, remediation, and clearance of methamphetamine-impacted properties. The primary guidance document to be used to develop the plan will be EPA's *Voluntary Guidance for Methamphetamine Laboratory Cleanup* (March 2013). The plan will include assessment guidelines, resident relocation plan (temporary or permanent), remediation requirements, closure requirements, project milestones, public health and environment protection procedures, project milestones and schedule, and a budget.

Sampling and Analysis Plan (SAP). WMAHA will prepare a Sampling and Analysis Plan following EPA Region 9 guidance that meets the Quality Assurance (QA) requirements of the Cooperative Agreement. The SAP will address Data Quality Objectives (DQOs), sampling rationale, analytical methods, field methods and procedures, sample documentation and delivery (including chain-of-custody procedures, and quality control. The SAP will be reviewed and approved by EPA prior to conducting any sampling.

Task 2 - Assessment

We anticipate 180 residences will be assessed using Multi-Purpose Grant funding. The initial assessment will be completed by WMAHA security using a sampling kit manufactured by Meth Lab Cleanup of America which is capable of detecting methamphetamine to a level of 0.1 micrograms methamphetamine per 100 square centimeters ($\mu\text{g}/100\text{ cm}^2$) for. This sampling kit was approved for use by EPA for WMAHA's three Fiscal Year 2017 Brownfields Cleanup grants. In addition, if present, the following additional materials and substrates will be sampled prior to intrusive activities in accordance with the procedures outlined in the Assessment and Cleanup Plan: soil, septic system, bulk chemicals or wastes, indoor air, building materials that will be disturbed or demolished that potentially contain asbestos-containing materials and lead-based paint. Only analytical laboratories certified by EPA, the Arizona Department of Health Services, or National Voluntary Laboratory Accreditation Program (NVLAP), as appropriate will be used to conduct wipe sample, soil, air, liquid, or other substrate analysis.

Task 3 – Remediation

The WMAHA will hire a qualified environmental contractor to remediate the methamphetamine-impacted residences. The contractor will be a Registered Contractor with the State of Arizona Registrar of Contractors. The contractor will prepare a Health and Safety Plan (HASP) to ensure the safety of its workers and the public, and all workers will have valid Hazardous Waste Operations and Emergency Response (HAZWOPER) training (40-hour initial and 8-hour refresher). The environmental contractor will be required to work with Tribal Employment Rights Office (TERO) to identify, hire, and train qualified Tribal members to conduct site cleanup and assessment.

Remediation of the methamphetamine-impacted residence will include cleaning, demolition, and/or encapsulation of contaminated substrates (particularly HVAC system, plumbing, ceiling, walls, floor, and counters; removal and disposal of contaminated carpet, window coverings, and furniture; bulk cleaning using a high-efficiency particulate air (HEPA) vacuum; removal of bulk liquids and wastes; removal of septic system contents and impacted soil; and disposal of other materials exceeding the remediation standard or that appear to be impacted. Asbestos-containing materials and lead-based paint will be properly abated prior to disturbance or demolition. WMAHA will attempt to reuse or recycle non-contaminated, salvageable materials in order to reduce waste generation.

Post-remediation confirmation sampling of the residence and associated property will be completed to include interior and possible exterior structural surfaces, indoor air, testing of soil where illicit chemicals

were kept, and septic system and other ancillary areas that were remediated due to production and use of methamphetamine. Post-remediation clearance sampling will be conducted in accordance with EPA's March 2013 guidance document and procedures outlined in the Assessment and Cleanup Plan. A surface cleanup standard of 0.1 micrograms methamphetamine per 100 square centimeters ($\mu\text{g}/100\text{ cm}^2$) for surface wipe sampling will be used to demonstrate adequate remediation of the residence has been completed. Indoor air samples will be collected and analyzed for specific chemicals outlined in the Assessment and Cleanup Plan, and the analytical results will be compared to EPA and California standards (Arizona does not have indoor air quality standards), and State of Arizona Soil Remediation Levels (SRLs).

Bulk chemicals, demolition debris, and remediation-generated wastes (wash water, cleaning materials, HEPA vacuum contents, etc.) will be properly characterized, packaged, transported, and disposed at a facility permitted to accept hazardous waste, non-hazardous waste, or asbestos-containing materials, as appropriate. Profile and disposal documentation will be included in the Site Closeout report (Task 4).

Task 4 – Site Closeout

WMAHA will prepare a Site Closeout report After remediation of a residence is completed that will include the following, at a minimum:

- Remediation description (areas remediated, amount of material disposed)
- Photographs and field notes
- Figures showing remediated areas and sample locations
- Analytical laboratory reports
- Waste disposal documentation

The WMAHA will issue letters or documents for submittal to other WMAT governmental departments and Community outreach programs where needed. These letters will document the methamphetamine cleanup actions and describe other controls or plans that will be instituted due to the cleanup actions. Site Closeout Reports will be provided to EPA, and relevant information will be input into ACRES.

Task 5 – Grant Compliance

The WMAHA will prepare reports and submit information as required by the Cooperative Agreement with EPA. Reports will include Quarterly Progress Reports, Annual Reports (Minority Business Enterprise (MBE)/Woman-Owned Business Enterprise (WBE) Utilization Report), Federal Financial Report (FFR), and Final Reports (Final Report, Final FFR, and Final MBE/WBE Report, as applicable). Property Profiles for residences for which assessment and/or remediation was conducted will be entered into the Assessment, Cleanup, and Redevelopment Exchange System (ACRES) on a timely basis, as applicable.

Schedule

Project milestones for the grant are provided in the table below. As shown in this table, due to the extreme shortage of low-income homes available to our community members and the dangers these homes pose to our community, we plan to expedite this grant so that it will be completed in less than 3 years. We are confident we can meet this aggressive schedule because of our experience with our existing Brownfields grants. All quarterly, annual, and final monitoring will be conducted on schedule.

Milestone	Date Completed
Grant Award Notification	June 2019
Work Plan and other Pre-Award Documentation Completed	August 2019
Funding Available	October 2019

White Mountain Apache Housing Authority
 Fiscal Year 2019 Brownfields Multi-Purpose Grant Application

Milestone	Date Completed
Update Community Engagement Plan	November 2019
Update Assessment and Cleanup Plan	January 2020
Update Sampling and Analysis Plan	January 2020
Develop Inventory and Prioritize Sites	February 2020
Assess 60 residences (first one-third of 180 total to be assessed)	April 2020
Remediate 25 residences	June 2020
Assess 60 additional residences (second one-third of 180 total to be assessed)	September 2020
Remediate 25 additional residences (50 total for program)	October 2020
Assess 60 additional residences (third one-third of 180 total to be assessed)	December 2020
Remediate 25 additional residences (75 total for program)	April 2021
Remediate 25 additional residences (100 total for program)	August 2021
Remediate 15 additional residences (15 total for program)	December 2021
Closeout grant	March 2022

Cost Share

WMAHA will provide a Cost Share of \$119,016, nearly three times the required \$40,000 cost share, in the form of in-kind personnel and fringe benefits. The activities that will be provided by WMAHA personnel include updates of plans used to successfully manage the Fiscal Year 2017 Brownfields Cleanup grants that WMAHA is conducting (Community Engagement Plan, Assessment and Cleanup Plan, SAP); conducting community outreach and notification; conducting assessment and post-remediation sampling; overseeing remediation; collecting soil, asbestos-containing materials, lead-based paint, septic system content, and air samples; preparing Closeout Reports; preparing required quarterly, annual, and final reports; entering data into ACRES; and attending training conferences, including EPA-sponsored National Brownfields conference.

b. COST ESTIMATES AND OUTPUTS

HAZARDOUS SUBSTANCES							
Budget Categories		Project Tasks (\$)					Total
		Task 1 – Planning and Preparation	Task 2 - Assessment	Task 3 – Remediation	Task 4 – Site Closeout	Task 5 – Grant Compliance	
Direct Costs	Personnel	\$0*	\$0*	\$0*	\$0*	\$0*	\$0*
	Fringe Benefits	\$0*	\$0*	\$0*	\$0*	\$0*	\$0*
	Travel	\$0	\$0	\$0	\$0	\$13,200	\$13,200
	Equipment	\$0	\$0	\$0	\$0	\$0	\$0
	Supplies	\$925	\$5,400	\$13,800	\$0	\$930	\$21,055
	Contractual	\$0	\$138,420	\$627,325	\$0	\$0	\$765,745
	Other	\$0	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$925	\$143,820	\$641,125	\$0	\$14,130	\$800,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0	\$800,000
Total Federal Funding		\$925	\$143,820	\$641,125	\$0	\$14,130	\$800,000
Cost Share		\$4,050	\$36,936	\$24,877	\$20,804	\$28,350	\$119,016
Total Budget		\$4,975	\$180,756	\$670,002	\$20,804	\$42,480	\$919,016
* - Personnel and fringe benefits to provided by WMAHA as Cost Share							

Task 1: Planning and Preparation (Federal Funding: \$925, Cost Share: \$4,050)

Supplies: Outreach materials (fliers, handouts) = \$925

Cost Share: Personnel (Brownfields Coordinator) – (120 hours)(\$25/hour) = \$3,000

Cost Share: Fringe Benefit (Brownfields Coordinator) – (35%)(\$3,000) = \$1,050

Task 2: Assessment (Federal Funding: \$143,820, Cost Share: \$36,936)

Supplies: Sampling Kit – (\$7.50/kit)(4 samples per assessed residence)(180 assessed residences) = \$5,400

Contractual: Asbestos Analysis – (\$18/sample)(8 samples per assessed residence)(180 assessed residences) = \$25,920

Contractual: Lead-Based Paint Analysis - (\$22/sample)(5 samples per assessed residence)(180 assessed residences) = \$19,800

Contractual: Soil and Septic Content Analysis (volatile organic compounds and 8 RCRA metals) - (\$170/sample)(2 samples per assessed residence)(180 assessed residences) = \$61,200

Contractual: Indoor Air Analysis (VOCs) - (\$175/sample)(1 sample per assessed residence)(180 assessed residences) = \$31,500

Cost Share: Personnel (Brownfields Coordinator) – (2 hours per assessed residence)(180 assessed residences)(\$25/hour) = \$9,000

Cost Share: Fringe Benefit (Brownfields Coordinator) – (35%)(\$9,000) = \$3,150

Cost Share: Personnel (Security/Maintenance) – (6 hours per assessed residence)(180 assessed residences)(\$17/hour) = \$18,360

Cost Share: Fringe Benefit (Brownfields Coordinator) – (35%)(\$18,360) = \$6,426

Task 3: Remediation (Federal Funding: \$641,125, Cost Share: \$28,877)

Supplies: Sampling Kit – (\$7.50/kit)(16 samples per remediated residence)(115 remediated residences) = \$13,800

Contractual: Environmental Contractor – (\$4,600/remediated residence)(115 remediated residences) = \$529,000

Contractual: Soil and Septic Content Analysis (VOCs and 8 RCRA metals) - (\$170/sample)(4 samples per remediated residence)(115 remediated residences) = \$78,200

Contractual: Indoor Air Analysis (VOCs) - (\$175/sample)(1 sample per remediated residence)(115 remediated residences) = \$20,125

Cost Share: Personnel (Brownfields Coordinator) – (2 hours per remediated residence)(115 remediated residences)(\$25/hour) = \$5,750

Cost Share: Fringe Benefit (Brownfields Coordinator) – (35%)(\$5,750) = \$2,013

Cost Share: Personnel (Security/Maintenance) – (8 hours per remediated residence)(115 remediated residences)(\$17/hour) = \$15,640

Cost Share: Fringe Benefit (Security/Maintenance) – (35%)(\$15,640) = \$5,474

Task 4: Closeout (Federal Funding: \$0, Cost Share: \$20,804)

Cost Share: Personnel (Brownfields Coordinator) – (4 hours per remediated residence)(115 remediated residences)(\$25/hour) = \$11,500

Cost Share: Fringe Benefit (Brownfields Coordinator) – (35%)(\$11,500) = \$4,025

Cost Share: Personnel (Security/Maintenance) – (2 hours per remediated residence)(115 remediated residences)(\$17/hour) = \$3,910

Cost Share: Fringe Benefit (Security/Maintenance) – (35%)(\$3,910) = \$1,369

Task 5: Grant Compliance (Federal Funding: \$14,130, Cost Share: \$28,350)

Travel: (2 people)(2 National Brownfields meetings)(\$1,800/person) = \$7,200

Travel: (2 people)(5 meetings)(\$600/person) = \$6,000

Supplies: Outreach materials (fliers, handouts) = \$930

Cost Share: Personnel (Project Director) – (6 hours/quarter)(25 quarters)(\$40/hour) = \$6,000

Cost Share: Fringe Benefit (Project Director) – (35%)(\$6,000) = \$2,100

Cost Share: Personnel (Brownfields Coordinator) – (24 hours/quarter)(25 quarters)(\$25/hour) = \$15,000

Cost Share: Fringe Benefit (Brownfields Coordinator) – (35%)(\$15,000) = \$5,250

Outputs

WMAHA will prepare a Work Plan in coordination with the EPA Region 9 Project Manager detailing the outputs, milestones, and schedule to guide the successful implementation of this grant. The following outputs, at a minimum, will be attained from use of funding from this Multi-Purpose grant:

- Prepare EPA-approved Sampling and Analysis Plan (SAP) to guide assessment and post-remediation clearance sampling activities
- Assess 180 potentially methamphetamine-contaminated houses
- Prepare inventory of methamphetamine-contaminated houses based on assessment and develop system to prioritize houses for remediation
- Develop Assessment and Remediation Plan
- Remediate 115 methamphetamine-contaminated houses
- Conduct post-remediation clearance sampling of 115 houses
- Prepare 115 Cleanup Reports
- Recycle and/or reuse non-impacted materials
- Hire two community members through TERO
- Update Public Outreach Plan
- Hold 20 public meetings

c. MEASURING ENVIRONMENTAL RESULTS

WMAHA will prepare an EPA-approved Work Plan prior to expending Brownfields Multi-Purpose grant funds. The Work Plan will include the Outputs and Project Schedule listed in Section 3.a. We will track the quantitative outputs and report our progress in meeting the schedule and outputs to EPA in our Quarterly Progress Reports. We will identify any current or anticipated issues or circumstances that may prevent us from achieving our stated goals, and provide resolutions to these issues. We will discuss our project status with our EPA Project Manager at least quarterly, or more frequently if issues or problems arise.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. PROGRAMMATIC CAPABILITY

i. Organizational Structure and Experience

Overall management of the grant will be provided by Mr. Victor Velasquez who has served as WMAHA's Executive Director for 13 years. Mr. Velasquez oversees all matters related to the WMAHA's budget and ensures WMAHA's programs meet all funding, budgeting, and compliance requirements. Ms. Bernadette Clarkson, Environmental Compliance/Brownfields Coordinator, who successfully managed WMAHA's previous three EPA Brownfields Cleanup grant, will be responsible for day-to-day management of contractors and grant administration.

WMAHA has extensive experience with assessment and remediation of methamphetamine-contaminated residences, and has developed specific programs and procedures necessary to successfully complete these projects. Over the past 2 years, we managed the remediation and clearance of over 80 residences using WMAT and EPA grant funding to transform these important community assets from unusable back to viable residences for low-income community members.

In addition to the EPA Brownfields Cleanup grant described below, WMAHA is managing several public and private agency grants: 3-year Resident Service Coordinator Grant (\$478,000, US Department of Housing and Urban Development (HUD)), annual Family Self-Sufficiency Grant (\$59,000, HUD), and Access to Housing and Economic Assistance for Development grant (\$25,000, FHL Bank). WMAHA has received and successfully managed funding for multiple programs over the past several years including:

- **Resident Opportunity Self-Sufficiency Program (ROSS).** \$700,000 to develop two new resident programs.
- **Apache Dawn Homebuyer Education Program.** \$350,000 grant funding to prepare Apache Dawn residents to qualify for mortgage financing, maintain residential market values, and educate potential homeowners.
- **Water Infrastructure Financing Authority.** Two loans (\$5 million total) to finance installation of water and wastewater infrastructure to facilitate construction of 317 homes.

ii. Acquiring Additional Resources

WMAHA supplements its in-house expertise through the use of consultants and contractors. Selection of these services is completed through a competitive proposal process, based on technical skill, past experience, and cost. This process meets applicable federal, state, and local requirements (including consideration for disadvantaged and small businesses).

b. PAST PERFORMANCE AND ACCOMPLISHMENTS

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

WMAHA received three Fiscal Year 2017 Brownfields Cleanup grants to remediate 33 low-income housing units in the communities of Whiteriver, McNary, and Cibeqe. The following outputs were achieved with the grant funding:

- Assessed 90 homes
- Remediated 33 residences
- Completed an EPA-approved Sampling and Analysis Plan (SAP), community involvement, Travel to EPA National Brownfields Conference
- Greater than 20% cost match

(2) Compliance with Grant Requirements

The WMAHA has successfully managed and complied with the requirements of the Cooperative Agreement and our EPA-approved Work Plan with EPA for the three Fiscal Year 2017 Brownfields Cleanup grants. We completed Quarterly Progress Reports, annual reports, MBE/WBE Utilization reports, and ACRES reporting in a timely manner. The grant period start date for the three Brownfields Cleanup grants was October 1, 2017 and the end period is September 30, 2020. The remaining grant funds and plan to expend the remaining funds by the end of the grant period are as follows:

Grant Community	Funds Remaining	Plan to Expend Remaining Funds
Whiteriver	\$0	Grant being closed out
Cibeqe	\$45,204	Expect to close-out grant in 2 nd Quarter of 2019
McNary	\$140,529	Expect to close-out grant in 4 th Quarter of 2019



WHITE MOUNTAIN APACHE HOUSING AUTHORITY

PO BOX 1270 - WHITERIVER, ARIZONA 85941 - PHONE (928) 338 - 4831 - FAX (928) 338 - 4835

THRESHOLD CRITERIA RESPONSE

Statement of Applicant Eligibility

The Fort Apache Indian Reservation, homeland of the White Mountain Apache Tribe, was established by Executive Order in 1871, and is a federally recognized and organized tribe pursuant to Section 16 of the Indian Reorganization Act of 1934.

Description of Community Involvement

The WMAHA has conducted extensive community involvement to educate and engage the community, WMAT departments, and community organizations regarding our methamphetamine assessment and remediation program. The WMAHA, along with other WMAT departments and Indian Health Services, developed educational materials and tools that were broadcast through the local radio station and distributed to community organizations and members. The main goals of our program are to educate the community members on the signs of methamphetamine manufacturing and usage, the dangers of the drug, and how to properly and safely address these issues. Community partners who we have enlisted for community outreach and engagement include:

- Rainbow Treatment Center – Vangie Natan, Director
- Apache Behavioral Health – Evelyn Emery, Director
- Boys & Girls Club – Sundeigh Walker, Club Manager

In 2016, the WMAHA launched a Meth Awareness Team in response to a high rate of methamphetamine contamination among the 1,300 housing units it maintains across the reservation. Over 100 community members attended the first community meeting held in September 2016. The team's goals are networking with law enforcement, obtaining additional funding, providing drug education training, implementing harsher consequences for offenders, reviving Neighborhood Watch, educating the community on the dangers of methamphetamine, centralizing data collection, seeking confiscated drug money to clean up contaminated housing, and brainstorming with other regional housing authorities for solutions.

The WMAHA continues to reach out to the community members on addressing the illicit use and addiction to methamphetamine by addressing and educating them on the ways to correct this community issue. We have held several community meetings and gone into the schools to address the dangers of methamphetamine and will continue to develop resources and educational materials while expanding upon our involvement in the community and local schools. Extensive public notification and engagement has been conducted by WMAHA during over the past year, as we have successfully remediated residences throughout the community using Fiscal Year 2017 Brownfields Cleanup funds.

The WMAHA also instituted a Resident Opportunity and Self Sufficiency (ROSS) Service Coordinator Program. The ROSS program uses supportive community organizations and services and activities to help WMAHA housing residents attain economic and housing self-sufficiency. Partnering with local organizations this program is another means used to educate the community by methamphetamine.

Description of Target Area

The Fort Apache Reservation covers over 1.6 million acres in portions of Apache, Gila, and Navajo Counties in east-central Arizona. It is the ancestral homeland of the White Mountain Apache Tribe (WMAT), a Federally-recognized Indian Tribe whose members are direct descendants of people who have occupied this land for centuries and have strong ties to this homeland. The Fort Apache Reservation has a population of 15,313. Over 95% of the residents of the Fort Apache Reservation are members of the

WMAT, who face significant economic, health, and environmental challenges. The poverty rate for all families is 40.5%. The median household income is \$26,120 (compared to the national average of \$57,652), and almost half the population uses Supplemental Nutrition Assistance Program (SNAP) benefits. The unemployment rate is 36.4%, almost nine times the national average. There are slightly more than 4,000 housing units, of which 60% are owner-occupied and 16% are vacant.

The WMAT Tribal Council established the White Mountain Apache Housing Authority (WMAHA) in 1963 with the mission to provide safe, decent, and affordable housing to Tribal members within the Fort Apache Reservation who face income or other life challenges. The WMAHA has over 1,200 low-income housing units available to its members, but due to the extraordinary economic challenges facing these families, has a waiting list of 1,800 individuals who are seeking safe and affordable housing.

As far back as 2006, the WMAT knew it had a major problem with methamphetamine use. In fact, in May 2006, the White Mountain Apache Tribe testified in front of the Senate Indian Affairs Committee that 30% of their Tribal employees recently tested positive for methamphetamine use. This was particularly disturbing because Tribal employees are often the community leaders and the number is actually believed to be an underestimate of use.

Over the last 10 years, prevalence of clandestine methamphetamine labs has escalated and become a social, economic, and public health issue on the reservation. In our community, methamphetamine is usually produced by extracting cold medicines and synthesizing the product with various toxic, caustic, corrosive, flammable, and explosive mixtures. Dangerous residual chemicals from the methamphetamine manufacturing process are dispersed throughout the house and remain in carpet, walls, furniture, drapes, air ducts, and the air where they pose a serious and potentially lethal health and safety danger. Consequently, when a meth-impacted house is discovered, the family is displaced and the temporarily uninhabitable house is either remediated or demolished. In addition, about 3 to 6 pounds of hazardous waste results from every 1 pound of meth produced; this hazardous waste is abandoned in homes or illegally disposed in rivers or forests throughout the community.

Site Ownership

The WMAHA owns site which meet the definition of a Brownfields site.

Meeting the Cost Share

WMAHA will provide a Cost Share of \$119,016, nearly three times the required \$40,000 cost share, in the form of in-kind personnel and fringe benefits. The activities that will be provided by WMAHA personnel include updates of plans used to successfully manage the Fiscal Year 2017 Brownfields Cleanup grants that WMAHA is conducting (Community Engagement Plan, Assessment and Cleanup Plan, SAP); conducting community outreach and notification; conducting assessment and post-remediation sampling; overseeing remediation; collecting soil, asbestos-containing materials, lead-based paint, septic system content, and air samples; preparing Closeout Reports; preparing required quarterly, annual, and final reports; entering data into ACRES; and attending training conferences, including EPA-sponsored National Brownfields conference.

Application for Federal Assistance SF-424		
* 1. Type of Submission: <input type="checkbox"/> Preapplication <input checked="" type="checkbox"/> Application <input type="checkbox"/> Changed/Corrected Application	* 2. Type of Application: <input checked="" type="checkbox"/> New <input type="checkbox"/> Continuation <input type="checkbox"/> Revision	* If Revision, select appropriate letter(s): <input type="text"/> * Other (Specify): <input type="text"/>
* 3. Date Received: <input type="text" value="01/31/2019"/>	4. Applicant Identifier: <input type="text"/>	
5a. Federal Entity Identifier: <input type="text"/>	5b. Federal Award Identifier: <input type="text"/>	
State Use Only:		
6. Date Received by State: <input type="text"/>	7. State Application Identifier: <input type="text"/>	
8. APPLICANT INFORMATION:		
* a. Legal Name: <input type="text" value="White Mountain Apache Housing Authority"/>		
* b. Employer/Taxpayer Identification Number (EIN/TIN): <input type="text" value="86-0194403"/>	* c. Organizational DUNS: <input type="text" value="1430475330000"/>	
d. Address:		
* Street1: <input type="text" value="P.O. BOX 1270"/>		
Street2: <input type="text" value="50 West Chinatown Street"/>		
* City: <input type="text" value="Whiteriver"/>		
County/Parish: <input type="text" value="Navajo"/>		
* State: <input type="text" value="AZ: Arizona"/>		
Province: <input type="text"/>		
* Country: <input type="text" value="USA: UNITED STATES"/>		
* Zip / Postal Code: <input type="text" value="85941-1270"/>		
e. Organizational Unit:		
Department Name: <input type="text" value="WMAT Housing Authority"/>	Division Name: <input type="text"/>	
f. Name and contact information of person to be contacted on matters involving this application:		
Prefix: <input type="text" value="Mr."/>	* First Name: <input type="text" value="Victor"/>	
Middle Name: <input type="text"/>		
* Last Name: <input type="text" value="Velasquez"/>		
Suffix: <input type="text"/>		
Title: <input type="text" value="Executive Director"/>		
Organizational Affiliation: <input type="text" value="White Mountain Apache Tribe Housing Authority"/>		
* Telephone Number: <input type="text" value="928-338-4831"/>	Fax Number: <input type="text" value="928-338-4835"/>	
* Email: <input type="text" value="vvelasquez@wmaha.us"/>		

Application for Federal Assistance SF-424

*** 9. Type of Applicant 1: Select Applicant Type:**

I: Indian/Native American Tribal Government (Federally Recognized)

Type of Applicant 2: Select Applicant Type:

L: Public/Indian Housing Authority

Type of Applicant 3: Select Applicant Type:

* Other (specify):

*** 10. Name of Federal Agency:**

Environmental Protection Agency

11. Catalog of Federal Domestic Assistance Number:

66.818

CFDA Title:

Brownfields Assessment and Cleanup Cooperative Agreements

*** 12. Funding Opportunity Number:**

EPA-OLEM-OBLR-18-08

* Title:

FY19 GUIDELINES FOR BROWNFIELDS MULTIPURPOSE (MP) GRANTS

13. Competition Identification Number:

Title:

14. Areas Affected by Project (Cities, Counties, States, etc.):

Add Attachment

Delete Attachment

View Attachment

*** 15. Descriptive Title of Applicant's Project:**

White Mountain Apache Housing Authority - Whiteriver
Multipurpose Grant Request to address the Brownfields(residences) where the illicit manufacture
and use of Methamphetamine have made sites unusable

Attach supporting documents as specified in agency instructions.

Add Attachments

Delete Attachments

View Attachments

Application for Federal Assistance SF-424

16. Congressional Districts Of:

* a. Applicant

* b. Program/Project

Attach an additional list of Program/Project Congressional Districts if needed.

Add Attachment

Delete Attachment

View Attachment

17. Proposed Project:

* a. Start Date:

* b. End Date:

18. Estimated Funding (\$):

* a. Federal	<input type="text" value="800,000.00"/>
* b. Applicant	<input type="text" value="119,016.00"/>
* c. State	<input type="text" value="0.00"/>
* d. Local	<input type="text" value="0.00"/>
* e. Other	<input type="text" value="0.00"/>
* f. Program Income	<input type="text" value="0.00"/>
* g. TOTAL	<input type="text" value="919,016.00"/>

*** 19. Is Application Subject to Review By State Under Executive Order 12372 Process?**

a. This application was made available to the State under the Executive Order 12372 Process for review on

b. Program is subject to E.O. 12372 but has not been selected by the State for review.

c. Program is not covered by E.O. 12372.

*** 20. Is the Applicant Delinquent On Any Federal Debt? (If "Yes," provide explanation in attachment.)**

Yes No

If "Yes", provide explanation and attach

Add Attachment

Delete Attachment

View Attachment

21. *By signing this application, I certify (1) to the statements contained in the list of certifications and (2) that the statements herein are true, complete and accurate to the best of my knowledge. I also provide the required assurances** and agree to comply with any resulting terms if I accept an award. I am aware that any false, fictitious, or fraudulent statements or claims may subject me to criminal, civil, or administrative penalties. (U.S. Code, Title 218, Section 1001)**

** I AGREE

** The list of certifications and assurances, or an internet site where you may obtain this list, is contained in the announcement or agency specific instructions.

Authorized Representative:

Prefix: * First Name:

Middle Name:

* Last Name:

Suffix:

* Title:

* Telephone Number: Fax Number:

* Email:

* Signature of Authorized Representative: * Date Signed: