

EPA Brownfields Redevelopment

EPA Brownfields Cleanup Grant Requirements

(Rhode Island DEM)

Overview:

NJIT TAB coordinated and conducted a workshop addressing EPA Brownfields Cleanup Grant Requirements for several EPA Cleanup Grantees in Rhode Island experiencing difficulties implementing their grants. The workshop consisted of presentations from USEPA-Region 1, RIDEM, and NJIT-TAB. The USEPA presentation consisted of an overview of major tasks to be completed for Brownfields Cleanup Grants, and RI DEM provided presentations regarding the State's Voluntary Cleanup Program (VCP) and Brownfield Process as well as Assessment and Cleanup Programs. NJIT-TAB provided an in depth presentation addressing EPA Brownfields Cleanup Grant Requirements relating to grant implementation including programmatic requirements, reporting requirements, eligible activities, and consultant procurement guidance and requirements. Copies of these presentations can be found at <http://www.njit.edu/tab/downloads/index.php>.

Some transferrable topics that emerged during workshop discussions are provided below:

- During consultant procurement a grantee cannot use the fact that a respondent has prepared an approved generic QAPP as criteria for consultant selection, however, can use the consultant's experience in developing approved QAPPs as a selection criteria.
- Documents related to Community Involvement, Public Relations, and site specific records can be made available to the public in an electronic format to satisfy the requirement of maintaining an informational repository.
- Regardless of whether or not any activities occur during a quarter, a quarterly report must be submitted. It is the grantees' responsibility to submit quarterly reports within 30 days of the close of the quarter, however USEPA Region 1 sends reminders to do so each quarter.
- When filling out a Financial Status Report the Unliquidated Obligations row should equal \$0. All obligations must be liquidated before a grant can be closed out.
- When filling out Form 272 the Cash on Hand row, similar to Unliquidated Obligations, is expected to equal \$0.
- To better assist in project identification the grantee should include the site name as well as project number when submitting a quarterly report.
- Quarterly reports can include a narrative regarding non-EPA related activities that are not included under the grant but may have either direct or indirect affects on a project's ability to advance.
- If previous quarterly reports have not been submitted, it is permitted for a grantee to submit one quarterly report to cover the activities of all the previous unreported

quarters; but it is a good idea to discuss this with your EPA project officer in advance.

- Grantees should coordinate with the appropriate USEPA project officer if assistance is needed in coming up with cost share possibilities and ideas.
- Funding partners should be looked at as partners in brownfields redevelopment and included in activities such as ribbon cuttings and publications.
- Participants in RI DEM Brownfields Assessment Program should be aware that RI DEM has a Master Price Agreement for assessment contractors, which is a prequalification of contractors with set rates. RI DEM has a “municipality clause” which allows municipalities to use this master price agreement if so desired. Grantees may solicit three price quotes from this pre-qualified list for any contract less than \$100,000. However, if the resultant contract is anticipated to be greater than \$100,000, per federal procurement regulations, it must be an open competitive bidding process.
- If a grantee would like to obtain environmental insurance to cover possible unanticipated cost overruns associated with cleanup, the cost of that insurance would be considered eligible under the grant.
- Any professional working on site must have appropriate insurance to include pollution liability insurance; professional liability (errors and omissions); workers compensation insurance; and auto insurance; and should have the grantee listed as an “additional insured” on their policy. In addition, anyone entering a brownfield site should be required to have OSHA 40 hour training.