R03-23-A-001

November 22, 2022

U.S. Environmental Protection Agency
Office of Grants and Debarment
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Review Committee,

[redacted]

[redacted]

[redacted]

1. Applicant Identification:
   Department of Energy and Environment
   1200 First Street, NE, 5th Floor
   Washington, DC 20002
   Telephone: 202-535-2600
   UEI: FE9RNTYNNKN9

2. Funding Requested
   a. Assessment Grant Type: Community-wide Assessment Grant for States and Tribes
   b. Federal Funds Requested: $1,996,589

3. Location: Washington, District of Columbia

4. Target Area and Priority Site Information
   Target Areas:
   Ward 5 – Census tracts 009400, 009401, 009398, 009399
   Ward 7 – Census tracts 007707, 007709, 007803, 007808,
   Ward 8 – 007503, 007601, 009811, 009804

   Priority Sites:

REAL CLEANERS	1319 GOOD HOPE RD SE
ALLSTATE DRY CLEANING	2026 RHODE ISLAND AVE NE
MASTER CLEANER	2066 RHODE ISLAND AVE NE
COLBERT'S CLEANERS	2129 RHODE ISLAND AVE NE
WOODRIDGE CLEANERS	2212 RHODE ISLAND AVE NE
BETTY BRITE CLEANERS	2223 MINNESOTA AVE SE
WOODRIDGE DRY CLEANING	2308 RHODE ISLAND AVE NE
BUTTERWORTH CLEANER	2310 RHODE ISLAND AVE NE
BERGMANN'S CLEANERS	2318 RHODE ISLAND AVE NE
MINNESOTA CLEANERS	2918 MINNESOTA AVE SE
WASHINGTON DRY CLEANING	332 62ND ST NE
JET CLEANERS	3507 WHEELER ROAD SE
GREENHOUSE CLEANERS	4001 GAULT PL NE
SUPER CLEAN	4415 BOWEN ROAD SE
CHESAPEAKE CLEANERS	605 CHESAPEAKE ST SE

5. Contacts:
   a. Project Director: Kelsey Tharp, (202) 697-0571, kelsey.tharp@dc.gov, Department of Energy and Environment, 1200 First Street, NE, 5th Floor, Washington, DC 20002..
   b. Chief Executive/ Highest Ranking Official: Tommy Wells, Director for Department of Energy and Environment, 202-535-2615, Tommy.wells@dc.gov, Department of Energy and Environment HQ, 1200 First Street, NE, 5th Floor, Washington, DC 20002

6. Population: 689,545 per 2020 Census data.

7. Other Factors: None of the Other Factors listed in the RFA apply to this grant application.

Sincerely,

Tommy Wells
Director

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

The District of Columbia Department of Energy and Environment (DOEE) will assess 15 former dry-cleaning sites with an elevated risk for past releases of hazardous substances to underlying soil and groundwater. Hazardous substances commonly used in dry cleaning include petroleum and chlorinated solvents like perchloroethylene (PCE) that present carcinogenic and non-carcinogenic risks to human health via multiple exposure pathways. Of particular concern for DOEE is the risk that hazardous substances released from these sites may have migrated into indoor air at the former dry cleaning facilities and into surrounding buildings via vapor intrusion. Dry cleaning facilities are often located in mixed use areas, and each of the 15 sites are within 100 feet of a residential property. Additionally, nearly 900 current and former dry cleaning facilities were recently identified throughout the District, indicating that a significant number of citizens could be exposed to these hazardous substances via vapor intrusion. The scale of this problem poses a unique challenge for DOEE, as the cost of investigation, mitigation, and remediation of these sites is profound.

The three target areas selected for this grant are Ward 5, Ward 7, and Ward 8. These wards were selected due to significant environmental justice concerns relative to the District's other five wards as indicated by their higher proportions of black residents, lower median household incomes, lower educational attainment, higher unemployment rates, and elevated poverty rates. Additionally, the target areas have not seen the same pressure for comprehensive redevelopment as other areas of the District, which reduces the likelihood of these sites being enrolled in DOEE's Voluntary Cleanup Program (VCP). While several dry cleaning sites have undergone comprehensive redevelopment under the VCP, the overwhelming majority of these sites are vacant, underutilized, or have been put into reuse without assessing or addressing the environmental risk posed by past use of hazardous substances at the site. For example, two former dry-cleaning sites were rapidly converted into childcare facilities in the last two years and several sites were redeveloped for residential use without regulatory oversight. The District's primary purpose for pursuing this grant is to assess such sites before they are reused or redeveloped without consideration of the aforementioned risks to public health and the environment.

ii. Description of the Priority Brownfield Sites

DOEE has selected 15 former dry cleaning facilities in the three target areas: four sites in Ward 7, four sites in Ward 8 (figure 1) and seven sites in an approximately 1,000-foot segment of Rhode Island Avenue NE in Ward 5 (figure 2). The sites are typical retail dry cleaners on plots of land less than a quarter acre in size. They were primarily selected based on their previous regulation under the Resource Conservation and Recovery Act (RCRA) and their long operational duration as indicated in historical resources. Eight of these sites appeared in the RCRA Biennial Report in 1999 or 2001, indicating that the site was either a Large Quantity Generator of hazardous waste or that solvent reclamation was performed on site. Based on DOEE's experience overseeing the investigation of other dry cleaning sites in the District, this combination of factors makes these sites exceptionally high risk for releasing hazardous substances to soil and groundwater. Two of the priority sites in Ward 7, Washington Dry Cleaning and Minnesota Cleaner, are located in food deserts, and assessment of these sites could potentially facilitate development of grocery stores or small markets.

Figure 1 - Locations of Priority Brownfield Sites

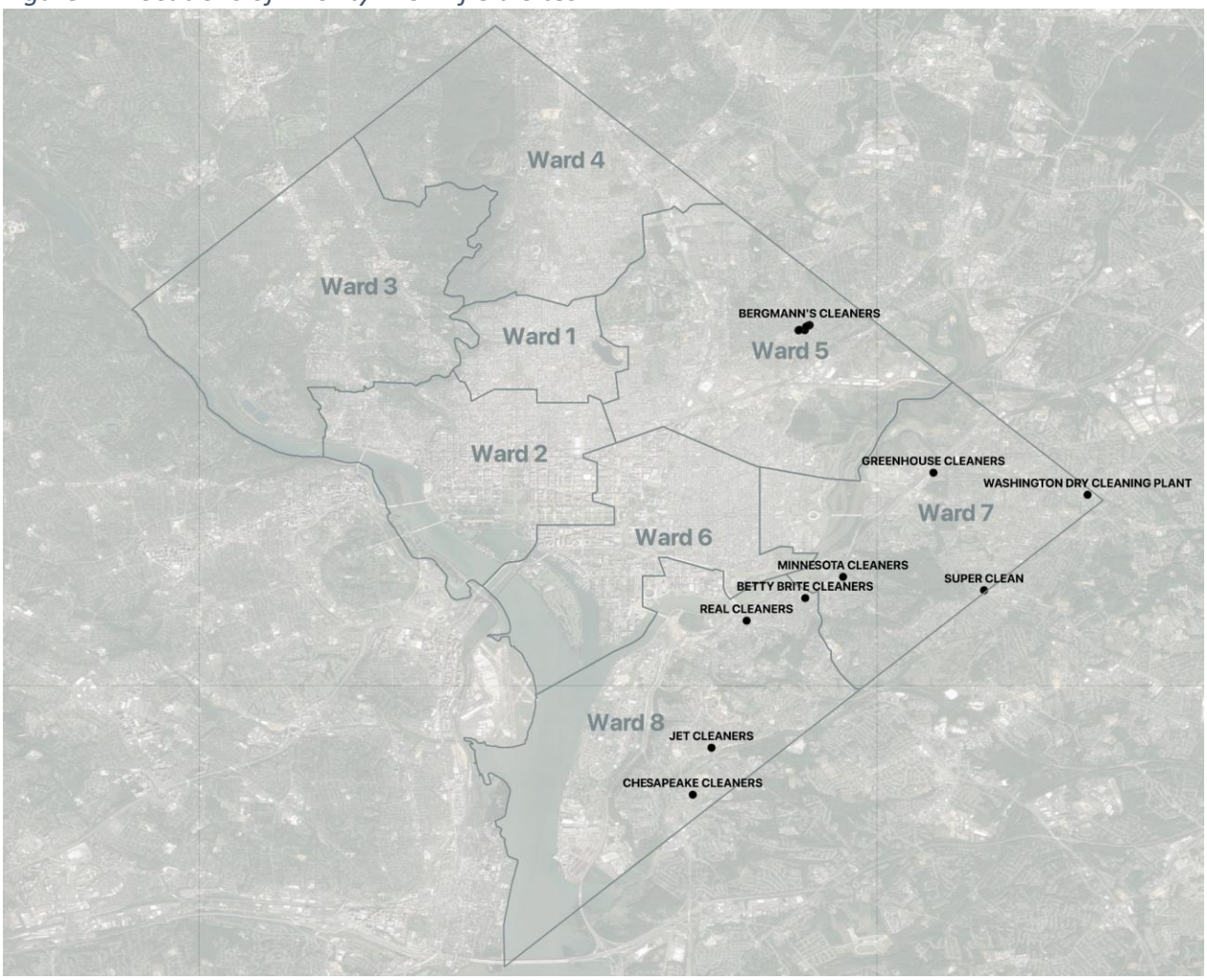

Figure 2 - Priority Brownfield Sites in Rhode Island Avenue NE Corridor

b. Revitalization of the Target Areas

i. Reuse Strategy and Alignment with Revitalization Plans

The former dry cleaning sites described above are located in mixed residential and commercial areas. Assessing and mitigating the environmental and human health risks posed by these sites could allow for the safe transition of these properties from commercial to residential zoning. Demand for housing in the District remains elevated, and several of the former dry cleaning properties are of sufficient size to allow for the construction of small to medium apartment buildings and condominiums. The sites likely to remain zoned for commercial use would make excellent locations for grocery stores, retail shops, or restaurants if potential contamination was adequately addressed. Ward 7 and Ward 8 are the central focus of the District's efforts to deliver government resources equitably. As previously mentioned, these wards have been underserved for decades and are disproportionately burdened by social and economic challenges.

The District government's Sustainable DC 2.0 strategy has set forth the broad goal of making the District the healthiest, greenest, and most livable city in the nation by 2032. A primary objective of this strategy is to "strengthen existing neighborhoods to be vibrant and walkable," and many of the former dry cleaning sites described above represent significant blight in their communities. Sustainable DC 2.0 also aims to "enhance programs to support businesses to open and operate in neighborhood commercial corridors, focusing on vacant and underused spaces." Again, these former dry cleaning sites will be a key component in reaching this goal, as many of the sites are located in existing commercial corridors that have been underutilized for decades. Assessment of the environmental risks associated with these properties under this grant will increase the appeal of these sites to future tenants and developers, as the costs and uncertainty of future regulatory actions associated with contaminated properties present a significant burden to small businesses and developers alike.

ii. Outcomes and Benefits of Reuse Strategy

The primary outcome is identification of complete vapor intrusion exposure pathways that pose a threat to human health. The secondary outcome is to reduce the stigma associated with the past use of these sites and encourage their reuse and redevelopment, as developers will not have to assess the property with their own funding. Additionally, an assessment performed by the regulatory agency drastically reduces the future liability associated with the site, increasing confidence for prospective purchasers. DOEE will further incentivize the reuse and redevelopment of these sites by installing sub-slab depressurization systems to mitigate the vapor intrusion pathway. All sites that pose a risk to human health will receive an Environmental Covenant to ensure site contamination is documented on the deed and ensure that mitigation systems remain in place and operational. Residential use criteria will be used for screening, mitigation, and potential future cleanup to ensure that remedies protect all future uses, allowing the site to be redeveloped for any purpose consistent with zoning.

Because the majority of these dry-cleaning sites are abandoned or underutilized, DOEE does not anticipate the displacement of residents and/or businesses. Investigation and mitigation activities will be performed in a manner that is minimally disruptive at sites with active businesses. DOEE and its contractor have extensive experience performing assessment work on dry cleaning sites in a minimally invasive manner, and DOEE considers it a priority to avoid economic disruption on any of these sites.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

Based on its experience investigating similar sites under previous grants and cleaning up sites under the VCP, DOEE is proposing to increase the availability of funds from fiscal year 2024 to 2028 to supplement funding from grant sources. Funds will be prioritized to mitigate vapor intrusion risks by installing sub-slab depressurization systems at the sites and affected adjacent properties. The remainder of the funds will be used at the most contaminated sites for targeted remedial actions, including targeted excavation, short-term soil vapor extraction, and in-situ chemical oxidation or reduction. For the most severely contaminated properties, the District will consider the purchase of select properties to make them eligible for future Brownfield Cleanup Grant funds. Additionally, the imposition of Environmental Covenants should encourage more sites to be enrolled under DOEE's VCP, meaning that private interests will fund the cleanup. DOEE is pursuing additional grant opportunities from EPA under CERCLA 128(a) and under a Superfund pre-remedial cooperative agreement.

ii. Use of Existing Infrastructure

The location of these sites in a dense urban environment, are typically on major thoroughfares and bounded by sidewalks and alleys, and the existing infrastructure will encourage future revitalization. Most of these sites are located on major bus routes with nearby stops, and one site (Greenhouse Cleaners) is within 300 feet of the Minnesota Avenue Metrorail stop. These sites also have existing water and sewer connections as well as access to high-speed internet. The existing infrastructure at these sites will increase the marketability of these sites to developers and help to promote more sustainable communities once environmental risks are assessed and mitigated.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

DOEE will use this grant to significantly expand its current program, that has historically focused on dry cleaning sites in environmental justice areas and those that have been converted into or are directly adjacent to childcare facilities. These small sites require significant expenditure of government funds due to geological factors that complicate site characterization and the constraints imposed by working within a dense urban environment. The rate of redevelopment at the target sites has resulted in a reduced chance of the site being purchased by an entity with the financial ability to fund assessment and eventual cleanup, leaving surrounding communities with considerable vapor intrusion risk and limited likelihood of these risks being mitigated in the near future.

Assessment of former dry cleaning facilities is not likely to be a primary concern of residents of the target areas, as knowledge of the environmental and human health risk posed by these sites is relatively niche. Further, DOEE is significantly better equipped to pursue and administer a grant than the individual citizens of the neighborhoods surrounding these sites. DOEE is the primary entity responsible for Brownfield assessments and has taken the lead on all activities within the District to date, but is willing to assist and partner with community organizations seeking to apply for Brownfield grants.

ii. Threats to Sensitive Populations

DOEE utilized EJScreen to collect demographic data on all identified dry cleaning sites while building an inventory of these sites within the District. Based on the size of the District and the possibility of significant demographic changes within several blocks of a site, the demographic statistics were based on a buffer area of one-eighth of a mile centered on each site. Percentile scores for asthma, heart disease, and low life expectancy were obtained directly from EJScreen and indicate significantly higher rates of these occurrences within the target areas. The priority brownfield sites described above are also associated with significant environmental justice concerns as evidenced by proportions of people of color and poverty rates that are well above the District-wide average, while per-capita income and educational attainment are well below the District-wide average. Additionally, all but two of the priority sites are located in areas with a higher proportion of children under the age of 5 than the District-wide average. Data from EJScreen for each site relative to the entirety of the District of Columbia is presented in Table 1.

(1) Health or Welfare of Sensitive Populations

The priority sites in Ward 7 and Ward 8 are located in the lowest income areas of the District. Per-capita income in these wards ranges from approximately 28% to 55 % of the District-wide figure of $60,600 per year. More than half of the local population is classified as low income, and the unemployment rate is at least double the District-wide average of 7% at five of the eight sites in these wards. These areas are also home to the highest percentages of people of color, with several sites located in an area where 99 to 100% of citizens are people of color. Seven of the eight priority sites are in communities where at least 95% of the population is comprised of people of color. Additionally, several sites are in neighborhoods with a high percentage of children under the age of 5. Five of the eight priority sites in Ward 7 and Ward 8 have a proportion of children under the age of 5 that is equal to or greater than the District of Columbia average of 6%.

The priority sites in Ward 5 along a corridor of Rhode Island Ave are less than two-thirds the figure for the District as a whole. Similarly, people of color make up 85% or more of the local population, well above the District figure of 63%. However, the percentage of children under the age of five is 50 to 100% higher than the District-wide average at six of the seven sites.

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

Exposure to solvents like PCE has been linked to cancer, reproductive health issues, and birth defects. Ward 7 and Ward 8 exhibit higher rates of cancer incidence and mortality than other Wards in the District, and Ward 5 displays a significantly higher rate of cancer mortality than other wards. Wards 7 and 8 have the highest infant mortality rates in the District, and residents are also known to be afflicted by significantly higher rates of heart disease and asthma. The majority of the census tracts containing these sites are associated with heart disease rates in the 70^{th} percentile or higher. The prevalence of asthma within these tracts is above the 90^{th} percentile. Similarly, low life expectancy scores within these tracts are in the 70^{th} percentile or higher, with areas surrounding several sites scoring in the 95^{th} percentile or higher (dchealthmatters.org). The communities surrounding the priority sites are not only socioeconomically disadvantaged but also disadvantaged in terms of health outcomes.

(3) Promoting Environmental Justice

The target areas have long been home to marginalized and underserved communities that are overwhelmingly comprised of people of color. Like numerous other urban areas, the District has a sordid history in regard to the treatment of citizens of color throughout its history. In the early 1940s, destruction of a historic black neighborhood in Ward 8 known as Barry Farms displaced numerous black families. After World War II, "white flight" saw a significant share of the District's white citizens move to suburban areas, depleting the District's tax base and disrupting the local economy. Urban Renewal efforts that began in the mid-1950s resulted in further destruction of black neighborhoods. Redlining and restrictive housing covenants confined black citizens to specific areas of the District (including wards 5, 7, and 8) and reduced the value of their property, limiting the ability of families to attain wealth across generations. These inequitable policies have contributed to a profound wealth gap between white and black citizens, with the former boasting a median household income of $161,000 per year but the latter only earning $54,000 per year.

Though the District does not have a history of heavy industry like many cities of its age, there were still numerous sources of pollution and contamination beyond dry cleaners and service stations. A former power generation station, trash transfer station, and a landfill that once burned waste in open pits were operated in Ward 7 for decades. Considerable portions of Ward 7 and Ward 8 are also downwind for much of the year from a former manufactured gas plant, the Washington Navy Yard, a power generation station on Buzzard Point, and the former Bolling Air Force Base and Anacostia Naval Air Station (currently Joint Base Anacostia-Bolling), all of which produced considerable air pollution in their operational heyday. Ward 8 is home to the Blue Plains Advanced Wastewater Treatment Plant, the largest facility of its kind in the world. Ward 7 and Ward 8 are also bisected by The Air Toxics Respiratory Hazard Index, which is in the 95th percentile for the entirety of the area surrounding the priority sites in Ward 5 and all but three of the sites in Ward 7 and Ward 8, which still score in the 81st percentile.

While these dry cleaning facilities may have once been a source of employment and consistent income for local residents, these blighted sites have left behind a toxic legacy that exacerbates known health disparities for the local population. Assessing and remediating these sites promotes environmental justice by addressing the long-ignored risks posed to human health in these communities, specifically exposure to hazardous substances via vapor intrusion. Assessment, mitigation, and eventual cleanup of these properties will facilitate redevelopment and improvement of property values in areas where marginalized citizens have historically struggled to attain generational wealth.

Table 1: EJScreen Results for Priority Brownfield Sites

	Site	Population Density (per sq. mile)	People of Color	Low Income	Unemployment Rate	Less Than High School Education	Under Age 5	Per Capita Income	Asthma Preavalence (Percentile)	Heart Disease Prevalance (Percentile)	Low Life Expectancy (Percentile)	Food Desert
WARD 8	**Betty Brite Cleaners** 2223 Minnesota Ave. SE	10,841	95%	23%	4%	10%	9%	$33,287	97	73	99	No
	Chesapeake Cleaners 605 Chesapeake St. SE	28,221	99%	62%	23%	18%	7%	$18,785	99	59	99	No
	Jet Cleaners 3507 Wheeler Rd. SE	15,076	99%	54%	21%	6%	10%	$16,752	99	63	96	No
	Real Cleaners 1319 Good Hope Rd. SE	15,849	87%	50%	5%	9%	17%	$25,887	99	75	99	No
WARD 7	**Greenhouse Cleaners** 4001 Gault Pl. NE	6,899	95%	59%	27%	9%	4%	$31,722	97	70	86	No
	Minnesota Cleaners 2918 Minnesota Ave. SE	20,918	98%	49%	14%	10%	2%	$27,166	97	80	69	Yes
	Super Clean 4415 Bowen Rd. SE	7,676	98%	29%	11%	13%	7%	$30,418	98	87	96	No
	Washington Dry Cleaning 332 62nd St. NE	9,324	100%	60%	29%	21%	3%	$21,146	99	79	98	Yes
WARD 5	**All State Dry Cleaning** 2026 Rhode Island Ave. NE	9,088	86%	22%	2%	8%	10%	$34,081	81	49	58	No
	Bergmann's Cleaners 2318 Rhode Island Ave. NE	9,392	87%	23%	2%	8%	9%	$37,483	81	49	58	No
	Butterworth Cleaner 2310 Rhode Island Ave. NE	9,190	86%	20%	2%	8%	11%	$37,483	81	49	58	No
	Colbert's Cleaners 2129 Rhode Island Ave. NE	8,774	88%	29%	1%	7%	7%	$34,081	89	70	88	No
	Master Cleaner 2066 Rhode Island Ave. NE	9,194	87%	26%	1%	7%	9%	$34,081	81	49	58	No
	Woodridge Cleaners 2212 Rhode Island Ave. NE	9,678	85%	17%	2%	8%	13%	$34,081	81	49	58	No
	Woodridge Dry Cleaning 2308 Rhode Island Ave. NE	9,190	86%	21%	2%	8%	11%	$37,483	81	49	58	No
	District of Columbia	*11,484*	*63%*	*27%*	*7%*	*8%*	*6%*	*$60,600*	--	--	--	*N/A*

b. Community Engagement

i. Project Involvement

At present, DOEE plans to utilize the District's vast network of Advisory Neighborhood Commissions (ANCs) to inform the surrounding communities about planned assessment activities and provide information about public meetings on the agency website. Under the District of Columbia Home Rule Act, each ANC is headed by a democratically elected Commissioner. The ANC Commissioner may advise the District government on a wide variety of issues, including sanitation, planning, public safety, and other matters. By communicating with the relevant ANC commissioners, DOEE will be able to inform the surrounding communities of proposed plans for the site succinctly and effectively. DOEE will also host virtual public meetings to engage residents and other potential stakeholders. These public meetings will present relevant assessment data, proposed plans, and seek community feedback on reuse and redevelopment of the sites. To promote transparency,

DOEE will also publish fact sheets about these assessments on the agency website and deposit printed copies of final reports at the public library nearest the site in question.

ii. Project Roles

As the regulatory agency making binding decisions regarding the future use of the sites, DOEE will render all decisions related to additional site investigation, mitigation, remediation, and future use. However, DOEE considers the public key stakeholders in the brownfield assessment and redevelopment process. ANC Commissioners will have input into these processes as part of their statute-defined responsibilities, and DOEE will engage residents in a manner that encourages them to participate in public meetings, provide comments on proposed plans, and feel that they were meaningfully engaged in the process.

iii. Incorporating Community Input

DOEE will seek comments on site assessment, cleanup, and future reuse for each site from residents and other stakeholders. Community input will primarily be sought through virtual public meetings organized based on target areas. One meeting will be held prior to the beginning of on-site work beginning and will inform residents about the assessment process. A second meeting will be held upon the completion of site investigation activities and will provide key findings as well as an overview of potential next steps with critical input from residents and stakeholders. A third meeting will present the Corrective Action Plan for each site. Public comments for these sites will also be sought through DOEE's website.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Description of Tasks/Activities and Outputs

Task 1: Phase II Environmental Site Assessment

Project Implementation: A Phase II Environmental Site Assessment (ESA) will be performed at each of the 15 sites listed above. Each Phase II ESA will consist of installing a minimum of five soil borings at each site, with each converted into a permanent groundwater monitoring well. A permanent soil vapor well will be installed adjacent to each groundwater monitoring well. Though permanent wells are not typically installed during a routine Phase II ESA, DOEE's experience with similar sites indicates a high likelihood that each site will be underlain by contaminated groundwater and soil vapor. Installing permanent monitoring points at the outset of the investigation is more efficient, as drilling and mobilization costs within the District are high. Additional delineation will likely be required at each site, and sites may remain in monitoring for several years after remedy implementation.

Anticipated Project Schedule: Performance of Phase II ESAs will be completed at all 15 sites within two years of grant award. Phase II ESA reports will be generated within 90 days of the completion of field activities.

Task/Activity Lead: DOEE and consultant

Outputs: Fifteen Phase II ESAs will be completed.

Task 2: Expanded Site Investigation

Project Implementation: An Expanded Site Investigation will be performed at each site, with contamination extending beyond the site property boundary. The Expanded Site Investigation will follow the same scope as the Phase II ESA but will be used to delineate the migration of

contamination away from the site. Performance of Expanded Site Investigations is likely to occur at all 15 sites.

Anticipated Project Schedule: Expanded Site Investigations will begin within one year of completion of the Phase II ESA and may continue through the entire 5-year performance period. An Expanded Site Investigation report will be generated for each site within 90 days of the completion of field activities.

Task/Activity Lead: DOEE and consultant

Outputs: Up to 15 Expanded Site Investigation Reports will be completed.

Task 3: Corrective Action Plan

Project Implementation: A Corrective Action Plan will be prepared for each site after the completion of the Phase II ESA and Expanded Site Investigation (if required) to assess potential remedies. Based on the density of the neighborhoods in which most of these sites are located, intrusive remedies are unlikely beyond targeted soil excavation and installation of vapor mitigation systems with ongoing monitoring. Environmental covenants will be used to ensure appropriate site reuse.

Anticipated Project Schedule: Preparation of Corrective Action Plans are anticipated to begin two years after grant award and will likely continue through the entire 5-year performance period. A Corrective Action Plan will be generated for each site within 90 days of completion of field activities.

Task/Activity Lead: DOEE and consultant

Outputs: Fifteen Corrective Action Plans will be completed.

Identifying Additional Sites

The previously referenced database assembled by DOEE contains several hundred additional sites where dry cleaning likely occurred, including at least 140 additional sites that are already deemed eligible for assessment. The same environmental justice demographics have already been gathered for the sites eligible for assessment, and this data will be used to prioritize additional sites for assessment along with consideration of proximity to sensitive receptors like childcare facilities and schools. Though the entirety of the District is urbanized and population density is high throughout, DOEE will select sites from areas of differing density, similar to the range shown for the fifteen previously described target sites.

b. Cost Estimates

Task 1 – Phase II Environmental Site Assessments

Personnel costs: 15 sites with 40 hours per site at $50/hr = $30,000
Fringe: DOEE's fringe rate is 23.7% of salaries
Contractual costs: 15 Phase II ESAs at $60,000/site = $900,000
Travel costs: to cover attendance of task lead at Brownfield conference = $2,000
Supplies costs: printing and binding of reports and mailers to community = $2,000

Task 2 – Expanded Site Investigation

Personnel costs: 15 sites with 36 hours per site at $50/hr = $27,000
Fringe: DOEE's fringe rate is 23.7% of salaries

Contractual costs: 15 Expanded Site Investigations at $55,000/site = $825,000
Supplies costs: printing and binding of reports and mailers to community = $2,000

Task 3 – Corrective Action Plan
Personnel costs: 15 sites with 20 hours per site at $50/hr = $15,000
Fringe: DOEE's fringe rate is 23.7% of salaries
Contractual costs: 15 Corrective Action Plans at $10,000/site = $150,000
Supplies costs: printing and binding of reports and mailers to community = $2,000

Budget Categories		**Project Tasks ($)**			
		Phase II ESA	Expanded Site Investigation	Corrective Action Plan	TOTAL
Direct Costs	Personnel	$30,000	$27,000	$15,000	$72,000
	Fringe Benefits	$7,110	$6,399	$3,555	$17,064
	Travel	$2,000	--	--	$2,000
	Equipment	--	--	--	--
	Supplies	$2,000	$2,000	$2,000	$6,000
	Contractual	$900,000	$825,000	$150,000	$1,875,000
	Other	--	--	--	--
Total Direct Costs		$941,110	$860,399	$170,055	$1,972,064
Total Indirect Costs		$10,265	$9,128	$5,132	$24,525
Total Budget		$951,375	$869,527	$175,687	**$1,996,589**

c. Measuring Environmental Results

The DOEE will establish a project schedule for the key milestones defined in the Cooperative Agreement. Each task's status and estimated completion dates will be tracked and reported to EPA via Quarterly and Final Performance Reports. Between reports, the following outputs will be tracked on a spreadsheet maintained by DOEE and its consultant, including: (1) the number of Phase II ESAs completed or in progress; (2) the number of Expanded Site Investigations completed or in progress; (3) the number of Corrective Action Plans completed or in progress; and (4) the number of community meetings held, number of fact sheets posted to the DOEE website. The parcels for each site will be maintained in a joint database between DOEE and its consultant, as well as the coordinates for all soil borings and monitoring wells. DOEE and its consultant will jointly manage a database of all laboratory analytical results associated with each site.

The primary outcome of this effort will be the number of sites and adjacent properties where vapor intrusion risks have been mitigated or remediated. DOEE will maintain and report a database of all sites where vapor intrusion risks were identified, assessed, and mitigated or remediated.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Capacity

As a growing agency and recurring recipient of CERCLA 128(a) grants, DOEE is well-positioned to carry out and manage the programmatic, administrative, and financial requirements of the project and grant. Since DOEE last applied for a Brownfields grant, key staff have been added to deal specifically with grants management and chlorinated solvent release sites. The Land Remediation and Development Branch (LRDB) of DOEE has spent the last year inventorying former dry cleaning sites within the District. These sites have historically been omitted from regulatory programs, and LRDB staff initiated the inventorying project with the explicit purpose of obtaining a Brownfields grant as seed money to begin addressing these sites and laying the groundwork for a formal program.

ii. Organizational Structure

Responsibility for the day-to-day management of this grant will lie with the LRDB remedial project manager overseeing chlorinated solvent sites within the District, who reports to the LRDB branch chief and the director of DOEE's Environmental Services Administration. The remedial project manager will also be responsible for all reporting tasks to EPA under the Cooperative Agreement. The deputy director of DOEE will manage the contract with the consultant.

iii. Description of Key Staff

The Project Director for this grant will be Kelsey Tharp, who serves as LRDB's remedial project manager for chlorinated solvent sites and created the database of dry cleaning sites. Mr. Tharp is experienced with soil and groundwater investigation and remediation under a variety of federal and state programs, including several dry cleaners and two chemical production facilities with significant chlorinated solvent impacts. Mr. Tharp will be supported by Renee Mabry, who serves as LRDB's program analyst. Additional assistance on technical matters will be provided by a consultant that has a considerable roster of engineers, geologists, risk assessors, and other technical specialists.

iv. Acquiring Additional Resources

DOEE does not anticipate the need for additional expertise in the management of the grant.

b. Past Performance and Accomplishments

(1) Accomplishments

DOEE has extensive experience managing grants, which included 33 federal grants from 11 funding sources in FY19 alone. DOEE's experience includes management of a CERCLA 128(a) grant since 2004 to fund the District's Brownfield State Response Program. Funding for this program totaled $816,200 from FY19 to FY22. DOEE has successfully performed all phases of work on this grant by consistently complying with work plan, schedule, and ACRES reporting requirements. DOEE has an excellent track record for on-time reporting, tracking, drawdown of funds, and reporting outcomes and outputs. To date, DOEE's VCP has issued 39 certificates of completion and currently manages an additional 36 active site cleanups.

A separate grant in 2012 allowed DOEE to perform Preliminary Assessments at 23 dry cleaning sites near childcare facilities. DOEE performed Site Inspections at nine of these sites and has continued investigation and mitigation activities at three of these sites. Considerable progress has been made

in the last year on pushing these three sites forward. DOEE is currently reevaluating the need for additional investigation activities on three of the sites where Site Inspections were completed. DOEE also administered a Superfund CORE Grant, Brownfields Site Assessment Grant, and Brownfield Job Training Grant from 2003 to 2006.

(2) Compliance with Grant Requirements

Additional examples of DOEE's performance on EPA awards over the last three years include:

Grant 1: PB-993190-19. Multi-year award FY17–FY19. $1,674,992. ***Performance:*** DOEE successfully managed and completed PB-993190-19 and was subsequently awarded BG-99319020. DOEE has had positive performance with BG-99319020. ***Reporting:*** DOEE consistently met quarterly reporting and final technical report requirements by developing each document within a month prior to the deadlines and implementing peer reviews on the data between team members prior to submission to EPA. DOEE provides progress reports on outputs, outcomes, and workload commitments in quarterly and final technical reports, mid-year and final review meetings, and intermediately throughout the fiscal year.

Grant 2: 96333202 Multi-year award FY17–FY19. $823,400. ***Performance:*** The grant was successfully managed, and the program was subsequently awarded a new grant for FY20-FY22. The success of the grant can be attributed to closely monitoring the grant commitments through frequent communications with EPA Region 3. ***Reporting:*** The program submitted mid-year and end-of-year reports for all three years of the grant and met all grant commitments. The program works with an internal team to track deadlines and gather required information.

Grant 3: 97334205. $329,643 FY16-19; Grant 4: X-A 96343202. $120,300. FY14-FY18; Grant 5: 00305517. $3,108,322. FY16–FY19. ***Performance:*** DOEE successfully closed out annual work plans and fulfilled the grant commitments and deliverables under these grants. ***Reporting:*** DOEE submitted semi-annual and annual reports for these grants, reporting on outputs and outcomes.

Based on the extent of contamination and associated investigation costs at other former dry cleaning sites in the District, DOEE anticipates that funds awarded under this grant will be expended well before the 5-year period of performance.