

**CITY OF LENOIR, NORTH CAROLINA**  
**BROWNFIELDS ASSESSMENT COOPERATIVE**  
**AGREEMENT WORK PLAN**

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Revision  
Number 0

Submitted by:  
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Cooperative Agreement Number:

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## **1.0 PROJECT OVERVIEW**

### **1.1 Project Description**

The City of Lenoir (City) is centrally located in Caldwell County, North Carolina, 65 miles northwest of Charlotte and 61 miles northeast of Asheville, North Carolina at the foot of the Blue Ridge Mountains. Named after Revolutionary War hero William Lenoir, the City was established by the NC Legislature as the County seat in 1841 and incorporated in 1851. Lenoir has historically been a furniture manufacturing community, especially with the opening of the Chester-Lenoir Railway in 1884. With the extension of the Chester & Lenoir Railway into Caldwell County, Lenoir quickly became a leader in furniture manufacturing, which created many stable, but blue collar jobs. Lenoir Furniture, started in 1889, was followed by Broyhill, Fairfield, Bernhardt and Kincaid Furniture companies.

The City is a charming small community located in the Piedmont region of North Carolina. We are a family-oriented community with great pride, but a tour of the City quickly demonstrates its economic decline. Numerous vacant commercial and industrial structures exist along its main corridors, largely within the 3.15 square mile area of Census Tract 301 (CT-301), our primary Brownfields target area, which includes the Larinco, Fairfield South neighborhoods and Lenoir's Central Business District (CBD). The Larinco and Fairfield South neighborhoods lie in the southwestern portion of CT-301, with the CBD adjacent to and northeast of these neighborhoods.

Our primary redevelopment target properties lie in this tract, adjacent to the Larinco and Fairfield South neighborhoods, whose residents historically supplied the labor for these businesses.

Furniture's decline through the 1980s and 1990s left a cultural, economic and employment void in the region. Lenoir, long the leader in the industry, suffered greatly as plants were shuttered and employees, many whose families had been employed by the furniture industry for generations were let go. The significant manufacturing plant closings Lenoir suffered in the past have created many vacant industrial buildings throughout the City.

Blight and underutilization of these properties reduces the overall community appearance. The Larinco and Fairfield South neighborhoods are located directly adjacent to our target sites. The City has been actively targeting redevelopment and revitalization of this area by identifying properties, engaging property owners and developing a comprehensive redevelopment vision. We have already identified 19 properties encompassing over 77 acres and 465,025 square feet of unused and/or underutilized space that are potential candidates for redevelopment. Details of our 5 strategic properties within CT-301 are provided in the table below. We have secured site access to all of these properties.

**Priority Properties in CT-301 – Lenoir’s Brownfield Target Area**

<b>Property Name &amp; Past Land Use</b>	<b>Current Condition</b>	<b>Acreage</b>	<b>Anticipated Reuse*</b>	<b>Estimated COCs</b>	<b>Environmental Issues/Concerns/Comments</b>
Virginia Street Property	Vacant – wood waste from former failed recycling facility	15 acres	Call and/or Data Center	Petroleum Metals, SVOCs	Known petroleum contamination. Extensive wood debris has made a portion of the site inaccessible for complete assessment.
Former C&NW Railroad Depot	Fair Condition but unsecured, use for surface storage	5.6 acres	Commercial – Brewery or Restaurant	Solvents & Petroleum VOCs, SVOCs, Heavy Metals,	Located along a proposed greenway, the site will be accessible to families and small children. The site is unsecured creating a vandalism and safety hazard.
Former City Service Cleaners	Very Poor and unsafe; roof collapse	0.14 acres	Commercial parking for adjacent restaurant	Solvents & VOCs, Asbestos & Lead Paint	Redevelopment to surface parking will give the adjacent restaurant room to expand by using site for parking.
Former Blue Bell Mill	Fair – partially utilized for storage and a flea market	8.23 acres	Multi-family	Petroleum VOCs, SVOCs, Heavy Metals, Asbestos & Lead Paint	Developers have expressed interest in redeveloping the mill building into apartments if the environmental risk can be addressed.
Former Bost Lumber	Fair – partially used for an automobile towing and storage facility	3.2 acres	Commercial Use	Petroleum VOCs, SVOCs, Asbestos	Good location adjacent to both the C&NL Rail Depot and Blue Bell Mill property and adjacent to a planned rails to trails greenway.

We plan to use these grant funds for assessment of selected Brownfield properties to support our central business district. The former Bost Lumber, C&NW Rail Depot and Blue Bell Mill are adjacent to a planned greenway project that is part of the congressionally-funded 330 mile Overmountain Victory National Historic Trail (OVNHT). The City has acquired the former rail line property as part of the OVNHT, which will eventually connect a 20-mile segment of the trail. Trail construction is ongoing and completion of the OVNHT through our target Brownfield area will offer a tremendous potential for linking these properties to our CBD. These properties and the OVNHT are located directly adjacent to the Larinco and Fairfield South neighborhoods.

The proposed development will stimulate economic renewal and growth by promoting tourism, preserving open space and providing enhanced opportunities for physical activity, which will

ultimately serve to improve the overall fitness and mental health of the targeted communities. We have emphasized our commitment to this area by allocating funds to improve water and sewer infrastructure to support redevelopment consistent with our Lenoir Comprehensive Plan and Fairfield South Plan.

The City has been proactive in kick-starting redevelopment in this area by acquiring the 15-acre Virginia Street property, which is been determined to be eligible for a North Carolina Brownfield Agreement. A portion of our brownfield funding is proposed to be used to complete the North Carolina Brownfield process, which will provide regulatory certainty for this property along with property tax incentives that will spur redevelopment. We are also pursuing an ARC grant to address other non-environmental challenges with this property. A combination of funding will provide an immediately developable 15-acre property that lies less than one-half mile from Google's new data center. Developers have expressed interest in this property, given its proximity to Google for a compatible use.

The City has already taken major steps to revive the downtown area through its establishment of the Downtown Economic Development Department, which administers the City's Main Street Program and promotes downtown revitalization through retail and small commercial development programs, grants and incentives. These are carried out through the department's Build Program, Main Street Program and Special Downtown District designation, which covers approximately 20 blocks of downtown Lenoir. One of our priority projects is located here, and our other priority projects are located adjacent to the district, all within CT-301.

The City will use the Environmental Protection Agency (EPA) Community-Wide Brownfield Assessment grant funds for community involvement, site inventory, site characterization, and cleanup/redevelopment planning activities to support the redevelopment of these targeted brownfields properties in the city as well as others if funding allows. The City will conduct Phase I and Phase II ESAs on the key brownfield sites that are of the highest concern to city residents as well as those that have the highest redevelopment potential. The preliminary site inventory was completed via a joint effort between the existing Business Growth Committee and the City's consultant. To encourage additional community participation and involvement, residents, community groups, and other economic development organizations will be asked to bring additional sites of concern to the table via a group of stakeholders that will be assembled to identify needs, establish priorities, and develop consensus on site selections. Clarifying the environmental issues on the properties will be the key to facilitating redevelopment efforts. The City will work closely with NCDEQ to ensure proper liability protections are in place for any property they consider purchasing or otherwise taking title to, as well as private entities who might not be aware of the protections offered by NCDEQ's Brownfields Program. The City currently has one 15-acre site that has been determined eligible for the NC Brownfields Program within our target area.

Should the Phase II ESAs determine impact that requires action, different remedial options will be researched and discussed in an Analysis of Brownfields Cleanup Alternatives Document (ABCA.) Finally, redevelopment planning will take place so that the next steps towards actual reuse of the property can be determined.

Lenoir anticipates the following health and welfare benefits to result from this project: protection of the public from exposure to contaminants at or emanating from the former mills (i.e. PCE, petroleum, asbestos and lead) resulting in decreased deaths from cancer; increased recreational use of new greenspace via connectivity of the rails-to-trails in our target area to the OVNHT, providing opportunity for exercise and physical activity and reduction of our high rates of obesity, heart disease and respiratory disease; removal of blight which will eliminate safety issues and continued expenditure of limited city resources (fire, police) to secure these sites, improve our sense of community and increase the attractiveness of our community to others (population and business growth); increased property values (particularly adjacent to our mills); and more job opportunities (temporary and permanent) to combat our unemployment, poverty and low income. Using these funds to assess the actual conditions at these sites will allow the City and property owners to take steps necessary to remove sources or put systems in place to mitigate exposure, increasing the safety of our community.

We anticipate the following environmental benefits from our project: Removal of contamination will help us address previously unstudied and undocumented health conditions caused by industrial uses adjacent to the Larinco and Fairfield South neighborhoods. Providing recreational, educational, and economic opportunities by redeveloping Brownfields will enhance the community's quality of life. A high percentage of low income individuals living near Brownfields in our target area develop chronic illnesses, such as lung diseases, heart disease, and cancer. Lenoir will focus on providing facilities for wellness care and health education for vulnerable populations and low-income citizens. Residents in these communities, particularly sensitive populations such as the children, women of child bearing age and the elderly are potentially exposed to contamination risk from these Brownfield sites. Typical contamination from these properties includes a mixture of VOCs, SVOCs, PAHs, heavy metals, petroleum constituents, and asbestos/lead-based paint. Removal of blight will increase property values and help mitigate current vagrancy and vandalism on these properties. Demolition of unsafe structures will benefit the public health of the immediate communities by proactively addressing environmental questions associated with these properties. Residents of the Larinco and Fairfield South communities will see improved air quality as older structures containing asbestos, lead and other contaminants are demolished and the properties redeveloped. The quality of surface water from surface run-off from these properties towards Lower Creek, Spainhour Creek and eventually the Catawba River will be improved as contaminants are identified, and plans developed for mitigation and remediation.

We anticipate that the redevelopment of our three adjacent target properties (former Blue Bell textile mill, Bost Lumber and the C&NW Railroad) will create additional recreational, residential and commercial job opportunities, thereby decreasing unemployment and poverty, and increasing our tax base and resident's access to basic amenities. Additionally, housing in these areas should improve, increasing property values and our property tax base. There has been preliminary interest in redeveloping the Blue Bell Mill facility into much needed multi-family housing. The same benefits hold true as we address the brownfields in our downtown area and add additional commercial/retail businesses. By expanding our greenway along the former C&MW rail line, we will create connectivity between this recreational resource and our downtown area. We believe this will ultimately improve the health of our community and their sense of community pride.

## 1.2 Project Team Structure and Responsibilities

The City is the lead organization managing the project. Mr. Radford Thomas is Lenoir's Public Utilities Director. The Public Utilities Director reports to the City Manager, Scott Hildebran. The City Manager reports to the City Council. Radford Thomas, Public Utilities Director, will serve as the Brownfields Project Director. Mr. Thomas will report to Mr. Hildebran and the Brownfields Steering Committee.

We have already retained an experienced brownfield consultant in accordance with the City's standard procurement process and the procurement procedures contained in 2 CFR 200.317-326 to assist us. As such, our project team has the capabilities to hit the ground running immediately upon grant award. The City will monitor the progress of the consulting group in meeting program deadlines to ensure that the project is completed on time and within budget. The consulting group will report to Radford Thomas. The City recognizes that it is ultimately responsible for following the project schedule and achieving the project objectives.

NCDEQ actively participates with EPA Brownfields Grantees in providing advice, involvement, and technical reviews of documents generated with grant funds. The City will contact Bruce Nicholson, Manager of the Brownfields Section, at NCDEQ and work with the various project managers for sites that enter their program. A copy of all technical documents generated on sites that enter the program will be provided to the NCDEQ Project Manager. A NCDEQ review of technical documents will be requested, including Site-Specific Quality Assurance Project Plans. The NCDEQ Project Manager will be notified prior to beginning a Phase II ESA. Further, the City will request State petroleum site eligibility determinations for all petroleum sites.

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Thus, the project team will be comprised of Radford Thomas, the City Brownfields Project Manager, Scott Hildebran, City Manager, Brian Gross, the EPA Project Manager, the NCDEQ Project Manager, and the consulting group. In order to ensure project performance accountability, the City will evaluate the progress of the project in achieving the stated goals. The City and project team members will meet monthly, either in person or by telephone conference call, to discuss current and future project activities. At its Kick-off meeting, the team will be provided with the terms and conditions of the cooperative agreement, and these terms and conditions will be reviewed and discussed. The City anticipates an in-person meeting with the project team on an approximate quarterly basis. The original Cooperative Agreement records and files will be maintained at the City Planning Department's Office with copies being maintained in the selected consulting group's office. In addition, the City is in the process of developing a Brownfield webpage that will be linked to the City's main website. The community will be able to access important project files on the webpage and will be able to track project activities, meeting dates and accomplishments.

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

Grant progress will be tracked, measured and reported by Radford Thomas. Mr. Thomas will also use EPA’s Assessment, Cleanup, and Redevelopment Exchange System (ACRES) along with the Steering Committee to assist with tracking and measuring grant progress. He will communicate frequently with the EPA Project Manager and quarterly reports will be submitted to EPA. The following is a list of anticipated outcomes and outputs for our project. Anticipated outputs for this project include: a completed Community Engagement Plan; number of Steering Committee Meetings; number of public meetings; number of attendees; number of outreach materials distributed; number of sites inventoried; number of Phase I and II ESAs; number of sites entered into the NCDEQ Brownfields Program; number of ABCAs completed; number of redevelopment/concept plans completed; and number of mitigation measures implemented. Anticipated outcomes include: number of new community members engaged through project activities; a comprehensive brownfields inventory; number of acres assessed; number of acres entered into the NCDEQ Brownfields Program; number acres redeveloped; number acres ready for reuse; number of jobs created and amount of dollars leveraged.

### **1.4 Budget**

The budget for our project is outlined in Attachment 1.

## **2.0 PROJECT TASK DESCRIPTIONS**

This section includes a summary of activities that will be conducted to meet our project objectives.

### **TASK 1 PROJECT MANAGEMENT AND REPORTING**

#### **A. Quarterly Reporting:**

In accordance with EPA regulations 2 CFR Parts 200 and 1500 (specifically, 200.328 *monitoring and reporting program performance*), we will submit quarterly progress reports to the EPA Project Officer (Brian Gross) within thirty days after each reporting period. Quarterly progress reports will be due 30 days after the end of each federal fiscal quarter, except for the last quarter of the grant project period when a final performance report must be submitted (see Final Performance Reporting below). The reports will be sent electronically to the EPA Project Officer and, if requested by the State, to the NCDEQ Brownfields Program. These reports will cover work status, work progress, difficulties encountered, financial expenditures, preliminary data results, anticipated activities and any changes of key personnel. A quarterly Site-Specific Budget Summary will be included to ensure that expenditures do not exceed the statutory limits.

#### **B. Annual Reporting:**

1. Disadvantaged Business Enterprise Reporting: Minority Business Enterprise/Women- owned Business Enterprise (MBE/WBE) reporting is required

since Lenoir’s total budget funds for procurement, equipment, services and supplies exceeds \$150,000. Disadvantaged Business Enterprise reporting will be completed annually using EPA Form 5700-52A. These forms will be sent electronically to the EPA Project Officer and the Grants Management Office (GMO) by October 30 of each project year.

2. Federal Financial Reports (FFRs): Lenoir will submit EPA Standard Form 425 annually to EPA by January 30 of each project year and at the close of the grant. An electronic copy will be sent to the EPA Project Officer and to the EPA Las Vegas Finance Center (LVFC) via email LVFC-grants@epa.gov or fax at 702-798-2423.
3. Projections: On April 30 of each project year, Lenoir will identify the specific sites where Phase I and Phase II ESAs are expected to be completed in the upcoming year. This Projections list will be submitted with the quarterly report.

**C. Final Performance Reporting:**

In accordance with EPA regulations 2 CFR Parts 200 and 1500 (specifically, 200.328 *monitoring and reporting program performance*), Lenoir will submit to our EPA Project Officer within 90 days after the expiration or termination of the approved project period a final technical report and at least one reproducible copy suitable for printing. This report will summarize the accomplishments (outcomes, outputs, and other leveraged resources) during the entire grant project period, including the last quarter. The Final Performance Report should include

- A table listing all the sites assessed during the grant, the deliverables associated with each site, activities conducted at the site, and the funds expended at each site;
- A list of any other deliverables;
- Site photographs; and,
- Lessons learned.

**D. ACRES:**

Property specific information, including the property address and Phase I and II ESA completions, will be entered electronically in EPA’s Assessment Cleanup Redevelopment Exchange System (ACRES) database. The information in the quarterly report will correlate with the information in ACRES. ACRES will be updated for each property when the following occur:

- Completion of Phase I
- Completion of Phase II
- Completion of the Project Period
- As significant events occur at the site, but not later than the end of the quarter in which the event occurred
- Leveraged dollars at the site (additional assessment, cleanup, and/or redevelopment)

**E. Contractor Procurement:**

We have already retained an experienced brownfield consultant in accordance with the City's standard procurement process and the procurement procedures contained in 2 CFR 200.317-326. We will ensure that our contractor complies with the terms of our contract and that the contract complies with the terms and conditions of the cooperative agreement. Our contractor will track costs site-specifically, such as for site-specific QAPPs and ESAs, and include an overall programmatic task to include costs that would be shared across all sites, such as generic QAPPs.

**F. Reimbursement Request:**

Lenoir plans to use EPA's Automated Standard Application for Payments (ASAP) through the U.S. Department of Treasury for reimbursement. If ASAP is not feasible, we will submit EPA form 190-F-04-001 via fax or email to the Las Vegas Finance Center.

**G. Kick-off Meeting:**

Our project team, consultant, EPA and State partners will participate in a project kick-off meeting to review the work plan and terms and conditions of the cooperative agreement. During this meeting we will review roles and responsibilities for the project and go over the project schedule. The EPA Project Officer will review tools and resources that may be useful for you to implement your grant activities.

**H. Travel:**

We plan to attend the EPA New Grantee workshop in Birmingham from September 26-29, 2018 and the National Brownfields Conference when scheduled.

Task 1 will be primarily conducted by Radford Thomas and Western Piedmont Council of Governments with assistance as needed from our consultant.

**TASK 2 COMMUNITY INVOLVEMENT/ ENGAGEMENT**

The City recognizes the importance of community involvement in brownfields projects. As such, the City is committed to continuing the community outreach and involvement activities that it initiated prior to the assessment grant application.

- A. Community Engagement Plan:** The City with the assistance of the selected consultant(s) will develop a Community Engagement Plan (CEP) to ensure that community concerns are considered in the assessment of brownfields properties in the City. The CEP will be submitted in accordance with the schedule provided in this work plan. The CEP will ensure that the public is kept informed of project progress and results and will encourage public involvement in the project. The Plan will detail the activities and efforts the City is planning, including:

**Outreach/Awareness:**

1. The City will appoint a spokesperson to respond to public, media, or other information

requests about the assessment grant activities.

2. The City is establishing a webpage for Lenoir's Brownfields Program. The webpage will be updated periodically with project activities and accomplishments, project files and meeting schedules.
3. The City will establish an Information Repository (IR) at the City Hall, specifically the City Planner's Office, to include project documents. The IR will be updated as additional documents are generated. Also, the City will include links to these documents on the project webpage.
4. The City has established a Brownfields Steering Committee within the larger Business Growth Committee. Those serving on the Task Force include the project team members as well as those groups and individuals who provided letters of support during the grant application process. Additional community members, organizations, developers, and stakeholders will be contacted to participate in the Brownfields Steering Committee. The committee will meet quarterly to discuss project activities and provide direction and recommendations for future project activities.

**Project Updates and other Public Information:**

1. The City will hold public meetings, as needed, to ensure community involvement.
2. The City will prepare and distribute information sheets to the community in understandable, non-technical language on an as needed basis.
3. Upon request, the City will attend the meetings of community groups to present information on the project, update them on progress, and invite participation.
4. When the City develops an Analysis of Brownfield Cleanup Alternatives (ABCA) for a site, the ABCA will be public noticed and the City will hold a public meeting during the public comment period.

Task 2 will primarily be conducted by Radford Thomas, our Steering Committee and our consultant.

**TASK 3 BROWNFIELDS SITE INVENTORY**

In addition to the already identified sites, the City and consultant will gather information on other potential brownfield sites throughout the city by working closely with the Brownfields Steering Committee as well as other community groups and individuals. Additional sites for the inventory will all be identified via several sources including, but not limited to state and federal regulatory databases, historical records, county and tax and property records. The City recognizes that its long-time residents hold the keys to deciphering the past uses of properties that might otherwise be missed. It is the intention of the City to update the site inventory using geographic information system (GIS) software to create a brownfield database of the properties. If the information is available, the GIS database will include land use information, historical status of the property, tax value, acreage, and environmental history. The inventory will be updated as new properties are added or new information is gathered.

Task 3 will primarily be conducted by our consultant.

## TASK 4 SITE CHARACTERIZATION

**A. Site Characterization:** Phase I and Phase II ESAs will be focused on the target properties identified above and other sites which are found to be a high priority for citizens and local leaders. Clarifying the environmental issues on these sites will provide the much-needed qualification and quantification of environmental concerns to move redevelopment forward and remove the obstacles for redevelopment. The City and its consultant will also work closely with NCDEQ and EPA to ensure that properties considered for assessment are eligible under the grant's terms and conditions. We will comply with Federal cross-cutting requirements. These requirements include but are not limited to OSHA Worker Health & Safety Standard 29 CFR 1910.120; National Historic Preservation Act; Endangered Species Act; and Permits required by Section 404 of the Clean Water Act; Executive Order 11246, Equal Employment Opportunity, and implementing regulations at 41 CFR 60-4; Contract Work Hours and Safety Standards Act, as amended (40 USC § 327-333) the Anti-Kickback Act (40 USC § 276c) and Section 504 of the Rehabilitation Act of 1973 as implemented by Executive Orders 11914 and 11250.

**B. Phase I Assessments:** The City anticipates completing eight Phase I ESAs with grant funding. Our four high priority sites will be completed initially. Other sites selected for Phase I ESAs will be determined by community input, access, and funding availability. All Phase I ESAs will follow procedures specified in the American Society for Testing & Materials (ASTM) Standard Practice for Environmental Site Assessment (E-1527-13) and the EPA approved All Appropriate Inquiry Rule (AAI). The primary goal for this activity is to make an “appropriate inquiry into previous ownership and use of the property consistent with good commercial or customary practice.” There are four (4) primary components to the Phase I ESA: Records Review, Site Reconnaissance, Interviews, and Report Preparation. The final report will include a statement as to evidence of recognized environmental conditions. Property profile information will also be entered into ACRES with the final Phase I ESA report for each property.

**C. Candidate Site Identification:** Several high priority sites have already been identified. The Brownfields Steering Committee will set the priorities for assessments of other properties. Sites will be identified, selected, and priorities will be set based on the following criteria:

- Level of perceived contamination and threat to human health and environment;
- Potential of the site for redevelopment and job creation;
- Level of community support for a redevelopment model for the site;
- Level to which redevelopment of the property will alleviate blight at the site and to the surrounding areas;
- Lack of viable or liable parties to conduct cleanup activities (site eligibly according to EPA and state guidelines);
- Proximity of the sites to sensitive populations; and
- Willingness of current property owner to sell and participate in the negotiation of a mutually beneficial transaction with potential end-users.

Prior to spending any funds for Phase II ESA on a site, the City will submit an EPA Region 4 Site Eligibility Determination Outline the EPA Project Officer and receive approval that the site is eligible for grant funds to be expended for Phase II activities. For properties suspected to be contaminated with petroleum, the City may also request a petroleum site eligibility determination from NCDEQ to assist with the eligibility determination. If the suspected contamination is a co-mingled plume of hazardous and petroleum substances, the City will work with the EPA Project Officer to make the funding determination using the following guidelines:

- A commingled site where we have reason to believe only *de minimis* petroleum exists must be processed using the hazardous substances eligibility screening only (and only use hazardous funds):
- A commingled site where we have reason to believe hazardous and petroleum contamination exist must go through both a hazardous and petroleum eligibility screening and once deemed eligible both funding sources (petroleum and hazardous) may be used; and
- A commingled site where we have reason to believe only *de minimis* hazardous substances exist must go through the petroleum eligibility screening (and use petroleum funds only).

**D. Phase II Assessment:** The City anticipates completing 6 Phase II ESAs. Several of the high priority mill sites will likely need some level of Phase II ESA. Phase II ESAs will be decided on for other properties dependent on the results of the Phase I ESAs and community input. Site-specific sampling and analyses will be performed as part of Phase II ESA in an effort to characterize the occurrence, distribution, nature and extent of contamination in soil and groundwater at a property. Phase II ESAs will be conducted in accordance with ASTM E-1903 (2011). Site assessment reports will be prepared and submitted to EPA and NCDENR summarizing results of Phase II ESA activity. The updated property profile information will be entered into ACRES with the final Phase II ESA report.

**E. Generic Quality Assurance Project Plan (QAPP):** The purpose of the Quality Assurance Project Plan (QAPP) is to outline procedures to ensure that the appropriate levels of data quality are obtained during field sampling, testing, and analytical activities during Phase II ESAs. A QAPP describes the organizational objectives, functional activities, and quality control (QC) activities designed to achieve the data quality objectives (DQOs) for the project. The City will have its consultant(s) develop a Generic QAPP that will combine all of the common and standard practices of Phase II ESA sampling. The Generic QAPP will be submitted to EPA for review and approval prior to the initiation of any Phase II ESA sampling.

**F. Site-Specific QAPP Addenda:** Once sites are identified as eligible for a Phase II ESA, a Site-Specific QAPP Addendum that will include the sampling and analysis plan will be developed and submitted to EPA and NCDEQ (as appropriate) for review and approval. Information specific to the property being evaluated (e.g., definition of the problem, description of the property, and project schedule) will be included in the Site-specific QAPP addendum. If Phase II sampling results suggest that a site cleanup will

be necessary and if grant funding is available, the City may propose additional sampling on the same property(ies) to sufficiently characterize the site to reasonably determine the costs of cleanup.

**G. Health & Safety Plans:** Subsequent to, or in conjunction with the Site-specific QAPP Addendum, the City will require its consultant(s) to prepare and submit an Occupational Health and Safety Administration (OSHA) compliant site specific Health & Safety Plan (HASP). An Environmental HASP establishes the work practices necessary to help ensure protection of field personnel performing environmental assessment/remedial activities. These activities may include, but are not limited to, drilling, monitoring well installation, soil, ground water, surface water, and sediment sampling, removal activities, capping activities, etc. The objective of the HASP is to provide a mechanism for the establishment of safe working conditions for the project. The safety organization and procedures will be established following an analysis of potential hazards at the site. Specific hazard control methodologies will be evaluated and selected in an effort to minimize the potential for accident or injury. All site operations will be performed in accordance with applicable federal, state, and local regulations. The HASP will be submitted to EPA.

Task 4 will primarily be conducted by our consultant.

## **TASK 5 CLEANUP PLANNING**

The ultimate goal for redevelopment is to provide potential site developers and/or other stakeholders with documents that quantify and qualify the environmental risks on a particular property. Subsequent to assessment activities, the City will develop remediation and cleanup plans on property(ies) determined to be the highest priority. These activities will include the development of an Analysis of Brownfield Cleanup Alternatives (ABCA) by identifying potentially applicable remediation alternatives and estimating the nature, extent, duration, and cost of implementing site remediation activities. Data from Phase II ESAs in conjunction with any other data from environmental assessments available for the property(ies) will be used as the basis for evaluating potential remedial alternatives. ABCA(s) developed for properties assessed under this grant will be submitted to EPA and NCDEQ (for sites in their program) for review and approval. Also, the ABCA(s) will be public noticed for a thirty (30) day period with a public meeting being held during the comment period. If an ABCA is developed, it will include the following:

- Information about the site and contamination issues (i.e. exposure pathways, identification of contaminants, contaminant levels and contaminant sources, source volume or other estimates as needed to compare relative costs between remedies);
- Identification of the contaminants of concern.
- A summary of Cleanup / protectiveness standards, applicable laws and regulations.
- A description of the remedial alternatives considered.
- Assessment of the effectiveness, ability to implement, and the cost of each alternative. As part of the evaluation of effectiveness, discuss whether/how each alternative would achieve cleanup / protectiveness standards and would comply with applicable laws and regulations.

- A comparative analysis of the alternatives considered.
- A selected or proposed alternative, noting any engineering controls that would be anticipated.

As a part of the redevelopment planning, the City may hold one or two visioning or redevelopment workshops to gather community input on redevelopment options for selected properties. Properties selected for redevelopment will be based on reuse alternatives identified through public involvement activities. The City will compare the potential land uses with the environmental impacts associated with the properties and the steps required to redevelop the property. The level of remedial action can then determine how to best meet the needs of the community. Consultants will also assist the City in negotiating brownfields agreements with NCDEQ, if needed.

The City recognizes that it may not be practical to clean up the properties assessed to allow for unrestricted use. Institutional controls may be an alternative. If so, the City will consider the requirements that accompany applying institutional controls to properties in its redevelopment planning.

In North Carolina, many sites are entered into the NC Brownfields Program and using risk-based techniques, cleanup requirements are lessened. Depending on the results of assessment activities, an area planning approach may be more appropriate. This would most likely be conducted within a well-defined, size appropriate target area, and with consideration of one or more specific catalyst brownfield sites. This may include such considerations as Brownfields economic research and market analysis, assess adequacy of city ordinances, assessment of infrastructure improvements needed to support the Brownfield area revitalization, coordination and alignment with other planning efforts, or other considerations. Any use of this approach would be considered in conjunction with our EPA Project Officer. It would most like require expertise not well suited for our staff or our chosen consulting firm. This task will result in a well-defined output as a deliverable such as defined, specific strategies for Brownfield assessments and cleanup/reuse plans moving forward from this grant, related improvements and investments necessary to advance sustainable and equitable revitalization within the well-defined project area, resources needed, partnerships and leveraging opportunities. It could also be market-based studies or economic analysis used to help guide redevelopment strategies.

Task 5 will primarily be conducted by Radford Thomas and our consultant.

### **3.0 SCHEDULE**

Attachment 2 provides a table with a detailed schedule for the project.

**Attachment 1**  
**Budget Table for Work Plan Tasks**

<b>Budget Categories</b>	<b>Project Tasks – Hazardous Grant</b>					
(Programmatic costs only)	Task 1 Project Management and Reporting	Task 2 Community Involvement & Engagement	Task 3 Site Inventory	Task 4 Site Characterization	Task 5 Cleanup Planning	Total
Personnel						
Fringe Benefits						
Travel <sup>1</sup>	\$4,136					\$ 4,136
Equipment <sup>2</sup>						
Supplies		\$ 4,400				\$ 4,400
Contractual <sup>3</sup>		\$10,000	\$4,500	\$146,631	\$5,000	\$166,131
Other – Grant Management Brownfield Fees	\$20,000 \$ 5,333					\$ 25,333
<b>Total</b>	<b>\$29,469</b>	<b>\$14,400</b>	<b>\$4,500</b>	<b>\$146,631</b>	<b>\$5,000</b>	<b>\$200,000</b>

<b>Budget Categories</b>	<b>Project Tasks – Petroleum Grant</b>					
(Programmatic costs only)	Task 1 Project Management and Reporting	Task 2 Community Involvement & Engagement	Task 3 Site Inventory	Task 4 Site Characterization	Task 5 Cleanup Planning	Total
Personnel						
Fringe Benefits						
Travel <sup>1</sup>	\$2,069					\$ 2,069
Equipment <sup>2</sup>						
Supplies		\$2,200				\$ 2,200
Contractual <sup>3</sup>		\$5,000	\$1,500	\$74,064	\$2,500	\$83,064
Other – Grant Management Brownfield Fees	\$10,000 \$ 2,667					\$ 12,667
<b>Total</b>						<b>\$100,000</b>

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

<sup>2</sup> EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year.

<sup>3</sup> Items costing less than \$5,000 are considered supplies.

<sup>4</sup> Applicants must comply with the procurement procedures contained in 2 CFR 200 and/or 1500.

## Attachment 2

### Schedule of Activities and Deliverables

- Start approved Phase I activities as soon as sites are identified (no need to wait for a final site inventory).
- Make community engagement a cornerstone of the program; it helps build the site inventory and program commitment.
- Projects with at least 35% of the funds expended on eligible tasks after 18 months are well positioned to spend all funds by the end of the project period.

<b>Time and Actions from Notice of Selection to Award</b>		
<b>Pre-Award</b>	<b>0 month</b>	Notice of Selection: May 2018
	<b>0-2 months</b>	City completes required grant award documents and submits to EPA
	<b>2 months</b>	EPA works with CAR to finalize grant work plan by July 2017
	<b>2-4 months</b>	City may conduct pre-award activities such as drafting the Community Engagement Plan
	<b>3-4 months</b>	EPA executes grant award
<b>Time and Actions from Award/Project Start to Project End</b>		
<b>Year 1</b>	<b>0 months</b>	Grant award
	<b>0-3 months</b>	RFP for contractor procurement is finalized (if not completed pre-award)
	<b>1-4 months</b>	Consultant contract executed and contractor on-board Kick-off meeting held with Consultant, EPA, State and others on the Project Team Complete Community Engagement Plan Plan First Public Meeting Start regular conference call meetings with Project Team
	<b>4 months</b>	Quarterly Report 1 is due 30 days after 1 <sup>st</sup> quarter ends Reimbursement Request Submitted ACRES Entries
	<b>4 – 8 months</b>	Develop generic QAPP and submit to EPA/State for approval Conduct Site Inventory and Prioritization Conduct Limited Site Characterization Host Public Meeting
	<b>7 – 8 months</b>	Start Phase I ESA(s) Convene regular conference call meetings with Project Team
	<b>7 months</b>	Quarterly Report 2 is due 30 days after 2 <sup>nd</sup> quarter ends Reimbursement Request Submitted
	<b>10 months</b>	Quarterly Report 3 is due 30 days after 3 <sup>rd</sup> quarter ends Reimbursement Request Submitted.
	<b>8-12 months</b>	Complete Phase I ESAs Enter Phase I ESA information in ACRES Submit signed AAI checklist to EPA Submit Site Eligibility Determination forms to EPA Develop site-specific QAPP and submit to EPA/State for approval Start Phase II ESAs
	<b>12 months</b>	Submit Federal Financial Report (SF425)
	<b>Year 2</b>	<b>13 months</b>
<b>16 months</b>		Quarterly Report 5 is due 30 days after 5 <sup>th</sup> quarter ends Reimbursement Request Submitted
<b>18 months</b>		<b>Half of 3 year grant is complete. Check-in with EPA/State for any modifications to work plan budget or scope of work. Make sure accomplishments to date are in ACRES.</b>

		<b>Make sure all drawdowns possible have been made. 35% of funds should be expended by this time.</b>
	<b>19 months</b>	Quarterly Report 6 is due 30 days after 6 <sup>th</sup> quarter ends Reimbursement Request Submitted DBE due with this quarterly report
	<b>22 months</b>	Quarterly Report 7 is due 30 days after 7 <sup>th</sup> quarter ends Reimbursement Request Submitted
<b>Ongoing</b>		Participate in regularly scheduled planning/status calls with Project Team Conduct and build on Community Engagement activities Identify financial commitments, developers, cleanup planning activities, etc.
<b>Year 3 and closeout</b>	<b>25 months</b>	Quarterly Report 8 is due October 30, 2017 Reimbursement Request Submitted. DBE due with this quarterly report
	<b>28 months</b>	Quarterly Report 9 is due 30 days after 9 <sup>th</sup> quarter ends Reimbursement Request Submitted
	<b>30 months</b>	6 months remain on the grant; Identify any remaining activities that should be completed prior to grant closing
	<b>31 months</b>	Quarterly Report 10 is due 30 days after 10 <sup>th</sup> quarter ends Reimbursement Request Submitted.
	<b>34 months</b>	Quarterly Report 11 is due 30 days after 11 <sup>th</sup> quarter ends Reimbursement Request Submitted
	<b>Prior to close-out</b>	Enter all work in ACRES; Prepare and Submit final Phase I or II ESA Reports and draft ABCAs.
	<b>35 month</b>	Reconcile accounts; collect remaining invoices for submission; gather deliverables for final close-out report
	<b>36 months</b>	Grant project/budget period closes; no further costs can be incurred after final date
	<b>37 months</b>	Quarterly Report 12 is due 30 days after 12 <sup>th</sup> quarter ends; May serve as Final Close-out Report if all project documentation is complete and ready. If so, then it is due 90 days after project period ends. MBE/WBE/DBE report due with this quarterly report.
	<b>37 – 39 months</b>	Submit final request for reimbursement with Final FFR (Standard Form 425) All Close-out documentation and final deliverables due within 90 days project end date.

## Attachment 3

### Example Quarterly Report Template

This is the suggested format the City of Lenoir can use to provide your EPA Project Officer with your quarterly report. Include property names and other details in the appropriate task description of accomplishments. Be descriptive with your reporting.

CAR Name: Cooperative Agreement Number: Date Quarterly Report Submitted: Quarterly Report Number:			
<b>Task 1: Project Management and Reporting</b>			
Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date <sup>a</sup>	Lead Party
A. Assemble internal team, including technical, financial, managerial. Establish project schedule.	Team established, agreement written. Schedule developed.	Qtr. 1	PM, team
B. Prepare bid documents for procuring contractor support.	Bid package complete.	Qtr. 1	City
C. Select contractor.	Contractor selected	Qtr. 2	PM
D. Kick-off meeting held.	Kick-off meeting complete	Qtr. 2	Team
E. Grant Project Reporting and Performance Evaluation:			PM
a. Quarterly Progress Reports to EPA & State	Quarterly Progress Reports (10 days after end of qtr.)		PM, team
b. Final Grant Reporting	Final Report (90 days after grant)		PM
F. Attend Regional & National Brownfields workshops			
<b>Cost Estimates for Task 1:</b> 1) Travel to Grantees' Workshop: Flight: \$600 Hotel: \$120/day x 2 night = \$240 Per diem: \$60/day x 3 = \$180 Total: \$1,030 x 2 people = \$2,040 2) Local site related travel: \$0.54/mi = \$150/yr x 3 years = \$450			
Actual Accomplishments and Progress Reporting for <i>(fill in the blank)</i> Reporting Period: <i>Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.</i>			
<b>Task 2: Community Involvement/Engagement</b>			
Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date	Lead Party
A. Setup Information Repository for Public Information	Files made publicly available.	Qtr. 1	PM, team
B. Detailed demographic assessment	Assessment complete, part of Plan.	Qtr. 1	Team
C. Community Engagement Plan Developed	Plan complete.	Qtr. 1	Contractor

D. Media, Electronic & Social Networking Systems Updated	Radio, TV, flyers newspaper, etc.	Every Qtr.	Team PM, Team
E. Meetings to describe project/schedule and/or updates Kick-off meeting Update after Phase I Update after Phase II Project completion with ABCA	Meetings conducted.	Qtrs.: 2, 4, 8, 10	

**Cost Estimates for Task 2:** (include cost estimates here)

Actual Accomplishments and Progress Reporting for *(fill in the blank)* period: Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.

**Task 3: Brownfields Site Identification and Assessments**

Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date	Lead Party
A. Develop Site Inventory	Site List	Qtr 3	Contractor
B. Site Prioritization and Selection	Phase I ESA Phase II ESA		
C. Develop Generic and Site Specific QAPPs	Site Eligibility Determinations		
D. Conduct Assessments	AAI checklist Draft and Final QAPPs		

**Cost Estimates for Task 3:** (include cost estimates here)

Actual Accomplishments and Progress Reporting for *(fill in the blank)* period: Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.

**Task 4: Cleanup Planning and Institutional Controls**

Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date	Lead Party
A. Develop Cleanup Plans	Draft and Final ABCA	Qtr 7	

**Cost Estimates for Task 4:** (include cost estimates here)

Actual Accomplishments and Progress Reporting for *(fill in the blank)* period: Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.

**Task 5: Area Planning**

Subtask / Activity	Deliverable/ Outputs / Milestone	Target Date	Lead Party

A. Procure Planning Organization	Procurement complete	Qtr 2	PM
B. Meet with Planning Team	Meeting Held	Qtr 2	PM, team
C. Conduct Market Survey for likely re-use options	Survey complete	Qtr 6	PM, market contractor
D. Assess Infrastructure	Assessment complete	Qtr 9	PM, contractor
<b>Cost Estimates for Task 5: (include cost estimates here)</b>			
Actual Accomplishments and Progress Reporting for <i>(fill in the blank)</i> period: <i>Use this area to provide a description of the progress made during the reporting period for this task. Be detailed and descriptive.</i>			

**Quarterly Expenditure Reporting**

Budget Categories	Costs Incurred This Quarter						
	Task 1	Task 2	Task 3	Task 4	Task 5	Total Spent this Quarter	Remaining Budget
	<b>Project Management and Reporting</b>	<b>Community Involvement/ Engagement</b>	<b>Brownfields Site Identification And Assessments</b>	<b>Cleanup Planning</b>	<b>Area Planning</b>		
<b>Personnel</b>							
<b>Fringe Benefits</b>							
<b>Travel</b>							
<b>Equipment</b>							
<b>Supplies</b>							
<b>Contractual</b>							
<b>Other (describe in Report)</b>							
<b>Total</b>							

Quarterly Site Specific Reporting for Community-Wide Assessment Grants

Site Name	Current Quarter Costs	Cumulative Costs Incurred to Date