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Revised:

**Work plan for the 104(k)(2) &(3) Assessment Cooperative Agreement
Albion, Michigan
Hazardous Substances**

Albion Brownfield Redevelopment Authority, Michigan
309 N. Superior Street
P.O. Box 725
Albion, MI 49224

This project supports:

- Environmental Results Goal 4:** Healthy Communities and Ecosystems;
- Objective 4.2:** Communities – Sustain, Clean up, and Restore Communities and the Ecological Systems that Support Them
- Sub objective 4.2.3:** Assess, Clean up and Redevelop Brownfields

Specifically, the Cooperative Agreement (CA) recipient will inventory, prioritize, characterize, assess, and conduct planning and community involvement activities to encourage revitalization and reuse of brownfields sites.

The Albion Brownfield Redevelopment Authority will have the following outputs:

- inventory brownfield properties/sites
- conduct up to 10 Phase I Environmental Site Assessments (ESAs)
- complete up to 6 Phase II ESAs
- prepare up to 4 Baseline Environmental Assessments (BEAs), and/or Cleanup and Redevelopment Plans
- Community Participation

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Project Period: October 1, 2009 – September 30, 2012

Program Results Code: Hazardous Substances – 402D79 (Action Code: NY)
CFDA: 66.818 The Small Business Liability Relief and Brownfields Revitalization Act
CERCLA Authority: 104(k)(2)&(3)
DCN: STX
Budget FY: 09
Appropriation: E4
Budget Org: 05F0AG7
Object Class: 4114

I. Introduction and Environmental Outcomes:

The United States Environmental Protection Agency (USEPA) has awarded the Albion Brownfield Redevelopment Authority (the Albion BRA) Brownfields Assessment Cooperative Agreement (CA) funds for the assessment of properties community-wide in the City of Albion (the City). The CA includes \$200,000 for the assessment of sites contaminated by hazardous substances. These funds will be used to inventory and investigate the historic uses of the properties; determine the type, severity, and extent of contaminants; and develop remedial alternatives that will allow for safe and viable reuse of the properties. For those properties where development is pending, Baseline Environmental Assessments, a component of Michigan's Voluntary Cleanup Program, and Brownfield Plans will be prepared to facilitate the transaction. The tasks and budget for the CA is described in the following sections.

The Brownfield Assessment CA will provide for:

- Community Involvement – including meetings and interaction with City-based organizations and stakeholders to solicit nominations for site assessment activities;
- Prioritization of sites identified for assessment activities;
- Development of a city-wide brownfields inventory;
- Performing Phase I and Phase II Environmental assessments at prioritized brownfield sites;
- Preparation of Baseline Environmental Assessments at selected sites as appropriate and in accordance with Michigan law; and
- Preparation of Cleanup and Redevelopment Plans as needed for priority sites having high redevelopment potential.

II. Project Overview

Once the USEPA Assessment CA is executed by both parties, the Albion BRA will identify, evaluate, and select specific properties where it will utilize the CA funds. Site selection criteria will be comprised of several factors, including the following: results of an inventory of brownfield sites within the City; property location within target redevelopment areas; known or suspected past site operations; community input; known or suspected environmental issues; and visual indication of potential contamination.

The Albion BRA will follow Federal procurement rules and retain a qualified environmental consulting firm to assist in developing an inventory of brownfield sites within the community and perform subsequent property information collection, environmental assessment, cleanup and redevelopment planning activities, and other CA support services as requested by the Albion BRA.

The Assessment Grant provides Albion with the funds it desperately needs to begin assessing the numerous brownfields in the City that are limiting redevelopment and contributing to the ongoing deterioration of neighborhoods and commercial and industrial districts. Specifically, the \$200,000 budget for this USEPA Community Wide Hazardous Materials Assessment Grant will be used to assess: all or portions of the large brownfields that are impacting neighborhoods in the City; brownfields that the City has expressed interest in redeveloping for community use; sites along the Kalamazoo River that are both impacting the river and limited residents' access to the river; and various smaller industrial/commercial sites throughout the City proposed for

redevelopment. Currently, a significant number of the large brownfields in the City are disproportionately located in close proximity to residences, community recreation facilities, and area schools. Consequently, the threat of human exposure to potential contaminants is intensified. The Assessment CA monies will allow the Albion BRA to take the first step in addressing the plethora of brownfields that have severely limited redevelopment options. By completing this project, the City will develop its brownfield program so that it can begin to effectively address the brownfields that have become an undesirable feature in its landscape. The City anticipates that the Assessment CA will help spur interest and investment, ideally allowing the City to establish itself as an attractive and healthy place to live, with excellent recreational options, a revitalized downtown area, and a solid, diversified economic base.

III. Management and Coordination

The Albion BRA will manage and administer the CA. The Albion BRA President, Ms. Margaret Meyer Sindt, will serve as Project Manager and will be responsible for all requirements for reporting to the USEPA. Quarterly reports, financial reports, progress of the work plan, and the final summary report will be forwarded to the USEPA Region 5. Due to limited availability of personnel, the Albion BRA and the City will require assistance with CA programmatic requirements and assessment activities. The Albion BRA will work closely with a qualified environmental consulting firm, the City's Planning and Financing Departments, and legal counsel to achieve project objectives, maintain budgets and schedules, and prepare plans and reports. The Project Manager will coordinate the CA activities with the selected consultant and will serve as liaison with the USEPA, the City, and the public at large through community outreach activities.

The Albion BRA Project Manager will be responsible for coordinating the selection of a qualified environmental consultant to perform the environmental assessments and other CA support functions. Qualified consulting firms will be solicited through an open competitive public Request for Qualifications and Proposal (RFQP). A firm will be selected and retained using quality-based selection criteria in accordance with BRA and City procurement protocols and applicable federal procurement rules (40 CFR 31.36).

IV. Work to be Performed

The schedule presented in the task tables below presumes that the cooperative agreement with the USEPA will be completed and approved by September 30, 2009.

TASK 1: Brownfield Inventory and Prioritization

Task I will involve the identification of priority brownfields in the City. The process will start with a review of all known or suspected brownfield sites. These include sites listed in the Michigan Department of Environmental Quality's (MDEQ) database of contaminated sites, illegal dumps, sites that have had a baseline environmental assessment (BEA), and those sites reported to the City from governmental agencies and community stakeholders. The process will also include the identification of sites through ground surveys. A Geographic Information System (GIS) brownfields overlay will be developed and a form will be designed to guide and document data collection. The Albion BRA will develop site prioritization criteria, prioritize sites for assessment activities, and determine the eligibility of prospective sites which will

include meetings with potential brownfield redevelopment site contacts to evaluate eligibility. Prioritization criteria will be based on site characteristics and history, available environmental information, potential threats to public health and the environment, known or potential developer interest, developer demand for specific property types and locations, and other pertinent factors identified during the inventory activities. A task budget of \$5,400 is proposed.

TASK 1: Schedule of Planned Activities – Brownfield Inventory and Prioritization

Activities	Deliverables	To Be Completed By:
Solicit Site Nominations	Begin to build a list of sites for consideration	January 31, 2010
Identify Brownfield Sites and Create Inventory; map locations	<ul style="list-style-type: none"> • Preliminary Inventory List • GIS Overlay 	April 1, 2010 and Ongoing
Prioritization of sites	Database	June 1, 2010
Reprioritize sites based on USEPA eligibility if necessary	<ul style="list-style-type: none"> • List of Prioritized Sites for Assessments 	Ongoing

TASK 2: Phase I Environmental Site Assessments

Funds allocated to this task will be used to complete Site Eligibility Determination Requests and perform Phase I Environmental Site Assessments (ESAs) in accordance with All Appropriate Inquiry and ASTM Practice E 1527-05 “Standard Practice for Environmental Site Assessments” at specific prioritized brownfield properties by a qualified environmental consultant. The budget for this task will include Phase I ESAs at costs proportionate to the number and complexity of sites selected for assessment. For planning purposes, the total task budget of \$28,000 assumes up to 10 Phase I ESAs (at an average cost of \$2,800) will be completed.

TASK 2: Schedule of Planned Activities - Phase I Environmental Site Assessments

Activities	Deliverables	To Be Completed By:
Prepare Site Eligibility Determinations	Individual Property Eligibility Determinations	Ongoing
Conduct Phase I Environmental Site Assessment Activities (ESAs)	<ul style="list-style-type: none"> • Completed Phase I ESAs 	Estimated date for completion of first Phase I ESA is by the end of August 2010 with additional Phase I ESAs completed as needed

TASK 3: Phase II Environmental Site Assessments and Baseline Environmental Assessments

Upon completion of the project activities identified in Task 1 and 2, the Albion BRA anticipates conducting Phase II ESAs where the Phase I ESAs or other available information suggest that additional investigation is warranted. Prior to commencement of the Phase II ESA work, the

Albion BRA and the selected consultant, will participate in a pre-Quality Assurance Project Plan (QAPP) conference call with USEPA. A QAPP will be prepared and submitted to USEPA for approval. A Sampling and Analysis Plan (SAP) will be prepared and submitted to USEPA for approval prior to conducting Phase II ESA field work at each site. In addition, a Health and Safety Plan (HSP), which addresses each property where Phase II ESA work is anticipated, as a whole or individually, will be submitted to USEPA for review. Individual Phase II ESA reports will be prepared for each site upon completion of field activities and receipt of analytical data.

Soil and groundwater data developed from the Phase II ESAs will be used to determine whether the site is a “facility,” pursuant to Part 201, Public Act 451 of 1995, the Michigan Natural Resources Environmental Protection Act. If warranted, the data will be used to develop a Baseline Environmental Assessment (BEA) report for review by the Michigan Department of Environmental Quality (MDEQ). The BEA is required to relieve a Michigan brownfield site developer of cleanup liability for contamination present on the property at time of acquisition. Phase II ESAs may be completed on all sites, and BEAs may be completed on sites/projects with an identified developer. For planning purposes, the total task budget of \$139,600 assumes up to six Phase II ESAs (at an average cost of \$20,500), and up to four BEAs (at an average cost of \$4,150) will be completed.

TASK 3: Schedule of Planned Activities - Phase II Environmental Site Assessments and Baseline Environmental Assessments

Activities	Deliverables	To Be Completed By:
QAPP preparation, pre-QAPP conference call w/EPA and consultant	<ul style="list-style-type: none"> QAPP, as completed 	A Draft QAPP will be sent to the USEPA within three months following agency approval of the Cooperative Agreement.
Prepare Sampling and Analysis Plan(s) <ul style="list-style-type: none"> Draft Final, as needed to incorporate EPA comments 	<ul style="list-style-type: none"> Draft Site-specific plan(s) to EPA Final Site-specific plan(s) to EPA 	On as needed basis throughout CA cycle.
Prepare Health and Safety Plans	<ul style="list-style-type: none"> Site specific Health & Safety Plan 	On as needed basis throughout CA cycle.
Conduct Phase II ESAs at priority sites where the Phase I has indicated further investigation	<ul style="list-style-type: none"> Completed Phase II ESAs Completed Phase II report(s) 	Ongoing/as needed <ul style="list-style-type: none"> Estimated date for completion of first Phase II ESA is October 2010.
Prepare Baseline Environmental Assessments on priority sites where redevelopment is pending and where the completion of	<ul style="list-style-type: none"> Completed BEAs 	On as needed basis throughout CA cycle.

Activities	Deliverables	To Be Completed By:
a BEA under the CA will facilitate the redevelopment		

TASK 4: Cleanup and Redevelopment Planning

Cleanup and redevelopment planning will be conducted for sites where redevelopment is imminent and such activities will assist the developer. Planning may take the form of identifying remedial alternatives; conducting Analysis of Brownfields Cleanup Alternatives (ABCA), developing Interim Response, Remedial Action, and/or Due Care Plans; and/or preparing Brownfield Plans and Work Plans to support acquisition of tax increment financing for environmental response actions under the Michigan Brownfield Redevelopment Financing Act (P.A. 381 of 1996, as amended). Meetings will be held with stakeholders to develop and review the most appropriate and effective remedial options for each selected brownfield site and redevelopment. The Albion BRA and environmental consultant will work closely with the MDEQ and USEPA in considering options for planning.

TASK 4: Schedule of Planned Activities - Cleanup and Redevelopment Planning

Activities	Deliverables	To Be Completed By:
Meeting to discuss possible redevelopment strategies.	None	On as needed basis throughout CA cycle.
Develop Cleanup and Redevelopment Plans.	Draft and Final Plans (to include but not limited to ABCAs, Brownfield Plans, Work Plans, Remedial Action Plans, Due Care Plans) for submittal to MDEQ and/or USEPA.	On as needed basis throughout CA cycle.

TASK 5: Community Involvement

The Albion BRA, and the City, will encourage community participation and provide opportunities for public interaction in the brownfields program. Upon acceptance of the USEPA Cooperative Agreement, the Albion BRA will continually involve community residents and keep citizens informed and involved in this Assessment CA. The Albion BRA has existing partnerships with the Albion Interfaith Ministries, the Forks Initiative, Albion Chamber of Commerce, Albion Community Foundation, Albion College, and the Albion Health Care Alliance. During various phases of the program, the types of community involvement will differ; although the same methods and groups discussed above (plus any other group representing the affected communities geographically proximate to targeted sites) will be involved.

When sites/properties are identified for assessment, the primary information flow will be outward to the community, notifying local stakeholders about assessment activities that will occur, providing results of the assessments, and explaining health and environmental impacts of

findings. If potential health threats to the community are identified, the county health department will become a partner in community involvement and education. When cleanup and/or redevelopment planning is initiated for a site/property, more intensive involvement activities, including explanations of plans and solicitation of feedback on those plans, will be implemented. The intensive “information out, feedback in” process will continue throughout the cleanup and redevelopment decision-making process.

Funds allocated to this task will cover costs associated with: meetings to discuss selection and prioritization of brownfield sites; meetings to discuss Phase I and Phase II findings at selected properties and gain input on potential redevelopment ideas; as well as meetings to discuss potential cleanup options. The total projected budget for this task is \$7,000.

TASK 5: Schedule of Planned Activities - Community Involvement

Activities	Deliverables	To Be Completed By
Update and maintain a Brownfields web page on the EDC's web site regarding USEPA CA activities and progress, with a link for public feedback.	Website address: www.albionedc.org	October 30, 2009
Conduct community informational meeting to introduce CA program and goals.	Introductory presentation Attendee list, meeting minutes	December 31, 2009
Hold/attend meetings, post notices, develop and distribute informational pieces, notices and advertisements.	Fact sheets and other informational pieces on the assessment program; attendee list, meeting minutes	Will continue throughout CA cycle.
Conduct informational meetings on projects.	Attendee list, meeting minutes; will be summarized in quarterly reports.	Will continue throughout CA cycle.

Task 6: Eligible Programmatic Expenses & Travel

CA administration will be the responsibility of the Albion BRA's Project Manager and may include support from the various members of the project team. Progress reports will be prepared and submitted to the USEPA Project Officer on a quarterly basis. These reports will describe the progress on each defined task in this Work Plan and additional information as required in the Terms and Conditions of the Cooperative Agreement. The reports will be submitted electronically unless another arrangement is discussed and approved by the USEPA. Property profiles will be completed and updated quarterly in the Assessment, Cleanup and Redevelopment Exchange System (ACRES) for each property where CA funds are expended. The City also will

prepare annual financial status reports on the program progress for the USEPA. This task includes general communications about the CA with the USEPA.

Records will be created and maintained for each site/property that has received CA funds, i.e. where CA funds have been used. Travel fees will include costs associated with City project staff attending the annual USEPA National Brownfield Conference and participating in other brownfields educational opportunities.

TASK 6: Schedule of Planned Activities - Programmatic Expenses & Travel

Activities	Deliverables	To Be Completed By:
Secure Professional Consulting Services	<ul style="list-style-type: none"> Firm name, address, and contact information for selected company 	November 30, 2009
Prepare Reports; submit property profile forms	Quarterly Reports, Annual Audit Reports, Final Reports, Property Profile forms	First Quarter due by January 31, 2010 and ongoing thereafter
Travel		Community meetings, Annual National Brownfield Conferences and other workshops/training as warranted

V. Budget Summary

The Hazardous Substance Assessment CA award is for \$200,000. The budget for the CA components is provided in detail in Table 1. The following is a brief description of the budget categories.

Personnel: Due to decreased revenue sharing to local units of government from the state of Michigan, significant restructuring and plant closings in the automotive sector, an overall increase in unemployment (currently 12.9% for the state), and decreased tax receipts, the Albion is experiencing a revenue shortfall. As a result of the shortfall, a portion of the personnel programmatic expenses originally proposed to be provided as in-kind services by the grantee must be partially funded with grant money. This condition resulted in reallocation of \$9,300 of CA funds for personnel expenses associated with programmatic costs. Specifically, the funds will be used for community involvement activities, including coordination, outreach meetings, preparation of informational materials, and documentation of public input brownfields database creation, GIS integration, site selection, and project coordination, which represents approximately 310 hours of staff time at an average hourly rate of \$30. No USEPA CA funds will be used for administrative costs or fringe benefits associated with Albion BRA or City staff; the Albion BRA will treat administrative costs and fringe benefits as in-kind contributions.

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Travel: The anticipated travel expenditures will total \$4,000. This figure accounts for the costs associated with attendance at local community outreach meetings, and with attendance at regional and national brownfields conferences and other brownfields educational opportunities by at least one representative of the Albion BRA project staff during the three years of the CA funding cycle. The locations for travel have not been determined at this time. A rate of \$0.505/mile will be used to calculate miles driven.

Supplies: The total anticipated cost for equipment and supplies is \$2,500. The Albion BRA intends to purchase a laptop computer (\$2,000) for support of Tasks 1, 5 and 6. The remaining \$500 cost pertains to the preparation, printing, and mailing of project and site information and pamphlets, documents, etc.

Contractual: The total anticipated cost for contractual services is \$184,200. This figure includes \$2,500 for support of community outreach efforts, \$3,000 for support of inventory activities, and \$4,100 for support of programmatic responsibilities. This figure also includes a budget of \$167,600 for assessment activities, which is based on conducting approximately ten Phase I ESAs at an average cost of \$2,800 each, six Phase II ESAs at an average cost of \$20,500 each; and preparing four BEAs at an average cost of \$4,150 each. The contractual budget also includes \$7,000 for cleanup planning tasks for sites/properties with good potential for redevelopment, or to facilitate proposed projects.

No additional budget categories for the CA have been identified at this time.

TABLE 1 – HAZARDOUS SUBSTANCE ASSESSMENT CA BUDGET ESTIMATES

Budget Categories	Project Tasks						
(Programmatic costs only)	Task 1 Inventory and Prioritization	Task 2 Phase I ESAs	Task 3 Phase II ESAs, and BEAs	Task 4 Cleanup and Redevelopment Planning	Task 5 Community Involvement	Task 6 Programmatic Responsibilities	Total
Personnel	\$2,000	—	—	—	\$4,000	\$3,300	\$9,300
Travel	\$400	—	—	—	—	\$3,600	\$4,000
Supplies	—	—	—	—	\$500	\$2,000	\$2,500
Contractual	\$3,000	\$28,000	\$139,600	\$7,000	\$2,500	\$4,100	\$184,200
Total Grant Budget	\$5,400	\$28,000	\$139,600	\$7,000	\$7,000	\$13,000	\$200,000

PROJECT MANAGER PROFILE

Peggy Sindt

Peggy Sindt is President and CEO of the Albion Economic Development Corporation (EDC), Albion, Michigan. The EDC also administers the Brownfield Redevelopment Authority of the City of Albion and the Tax Increment Finance Authority of the City of Albion. She is responsible for the recruitment and retention of businesses in Albion. Under her management, the EDC has acquired Michigan Economic Development Corporation grants and loans which developed a large addition to Albion's Industrial Park and Michigan Department of Environmental Quality (MDEQ) loan which paid for the demolition of a dilapidated building on a brownfield site. She has also administered a grant which paid for site evaluations on several brownfield sites and partnered with MDEQ on an emergency cleanup and site evaluation of a major brownfield site.

Peggy is active on numerous boards and commissions, including Homestead Savings Bank, Battle Creek Health System (secretary), Albion Health Care Alliance (immediate past chair), Albion College's Planned Giving Advisory Committee, Albion Community Foundation, Calhoun County Land Bank, BC/CAL/KAL Foreign Trade Zone, Michigan Quarter Horse Association, and the Arts and Industry Council. Formerly she has served on such boards as the Michigan Economic Developers board vice chair, Rotary assistant district governor and club president, and the Calhoun County Land Use committee.

She has a bachelor's degree from Albion College and an MBA from The University of Michigan. She also holds the Economic Developers Certificate from the Michigan Economic Developers Association.