

# CLEANUP WORKPLAN

## Stafford, Town of Workplan for CERCLA Section 104(k) Cleanup Cooperative Agreement Period of Performance: 7/1/2022 – 9/30/2025 with pre-award

### 1. GOAL 1: Core Mission

#### Objective 1.3 Revitalize Land and Prevent Contamination

##### CFDA: 66.818 Assessment, Cleanup, and Revolving Loan Fund Grants

**OBJECTIVE:** The Small Business Liability Relief and Brownfields Revitalization Act (SBLRBRA) was signed into law on January 11, 2002. The Act amends the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by adding Section 104(k). Section 104(k) authorizes the U.S. Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct planning related to, remediate, or capitalize revolving loan funds for, eligible brownfield sites. The Brownfields Utilization, Investment, and Local Development (BUILD) Act of March 2018 reauthorized and amended the Brownfields provisions of CERCLA. Finally, the Infrastructure Investment and Jobs Act (IIJA) of November 2021 provided additional funding and opportunities for communities to address the economic, social, and environmental challenges caused by brownfields sites. Pursuant to these provisions, EPA conducts annual Brownfields grant competitions. Recipients are selected from proposals prepared in accordance with the “Proposal Guidelines for Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Grants,” and submitted in a national competition. The Town of Stafford, as a general purpose unit of local government, was selected for Cleanup funding in the FY 2022 competition.

The Witt School (the “Site”) is located at 20 Hyde Park Road, less than half a mile from the Town Hall in a central area of prime development. As part of Stafford’s Brownfields Initiative, the Town has an active community survey garnering feedback on community development needs and ideas for redevelopment uses of the former Witt School. The town also issued a Request for Interest, Ideas, and Innovation to prospective developers. The most favored redevelopment scenarios derived from community input included improving access to food, public recreational amenities, and affordable senior housing. The project is a mixed-use, mixed-income building utilizing the bottom floors to create a permanent farmers/cooperative market, including a farm-to-table dining experience. The vision appeals to Stafford’s rich agricultural heritage and robust farming community, while generating a hub for social activity to promote economic growth. Given that Target Area is a USDA-designated food desert, the suggested reuse would ameliorate the desert conditions by providing access to affordable and nutritious food. The proposed mixed-use space retains the existing gymnasium and kitchen, developing space for much-needed recreation and entertainment opportunities while providing a legal space for farmers and entrepreneurs to pursue certified food ventures. In addition, and partnership with the Stafford Housing Authority, the upper floor would be converted into affordable senior housing with an adult day care center. Up to 35 units of affordable housing for seniors is envisioned, with shared access to the gymnasium and kitchen to augment activities for the adult day care center.

The goal of the project to be funded by this cooperative agreement is to remediate the subject brownfields property and to facilitate the properties' redevelopment. These goals will be accomplished by performing non-site-specific tasks and site-specific tasks. Non-site-specific tasks include hiring a Qualified Environmental Professional (QEP), obtaining remedial contractor services and performing public outreach. Site-specific tasks include preparing a community relations plan, a QAPP, an ABCA and enrolling in the State Voluntary Cleanup Program (VCP).

Cooperative agreement funding will be used to cover the costs of activities at or in direct support of brownfields sites as defined under CERCLA 101(39). The overall coordination of the cooperative agreement will be carried out by the Town of Stafford, assisted by the Director of Grants & Community Development, Finance Department, and the Town Attorney, with technical assistance and oversight to be performed by a Qualified Environmental Professional (QEP) and the VCP.

**Describe your project and cleanup plan:**

The Site is not suitable for redevelopment and reuse without the removal of asbestos-containing materials (ACM), various PCB-containing hazardous building materials (HBM), and lead-painted surfaces of the building. The proposed cleanup plan is to remove / abate ACM, PCB and lead impacted HBM. Abatement of contaminated building materials will be conducted by a competitively procured, appropriately licensed remedial contractor pursuant to CT Remediation Standard Regulations (RSRs) adopted by the Commissioner pursuant to section 22a-133k of the Regulations of Connecticut State Agencies (RCSA). Licensed, off-Site disposal of contaminated media will be conducted pursuant to the aforementioned regulations and the Connecticut Hazardous Waste Management Regulations [22a-446d]. Additional applicable local, state and federal regulatory requirements will also be adhered to. Asbestos abatement actions will require notification to and coordination with the Connecticut Department of Public Health (CT DPH) and will be conducted in accordance with CT DPH rules and regulations. This cleanup plan effectively removes the contaminant exposure pathways at the facility and allows for the beneficial reuse of a cherished community building that currently lies vacant and deteriorating. The cleanup plan will invigorate the local economy, provide near-term and long-term employment and affordable senior housing opportunities, and provide much needed access to fresh produce in the USDA designated food desert Target Area and local community.

**2. FUNDING: \$650,000**

**3. BUDGET:**

The total costs estimated for the project must agree with the amounts contained in the Application for Federal Assistance Budget Page (Form 424A). (Use amounts from your application, but do not include more than 4 tasks.).

	Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach & Engagement	Task 3 Site Specific Cleanup Activities	Task 4 Site Cleanup Oversight & Cleanup Completion Reports	<b>Total</b>
Personnel	\$3,500	\$3,500	\$0	\$0	<b>\$7,000</b>
Fringe Benefits	\$ -	\$ -	\$0	\$0	<b>\$ -</b>
Travel	\$3,000	\$ -	\$0	\$0	<b>\$3,000</b>
Equipment*	\$0	\$0	\$0	\$0	<b>\$0</b>
Supplies	\$0	\$0	\$0	\$0	<b>\$0</b>
Contractual	\$7,000	\$8,000	\$542,500	\$82,500	<b>\$640,000</b>
Other (specify)	\$0	\$0	\$0	\$0	<b>\$0</b>
Total Direct:	\$13,500	\$11,500	\$542,500	\$82,500	<b>\$650,000</b>
Indirect Costs:	\$0	\$0	\$0	\$0	<b>\$0</b>
<b>Total Federal Funding</b>	\$13,500	\$11,500	\$542,500	\$82,500	<b>\$650,000</b>
<b>Cost Share**</b>	\$ -	\$ -	\$126,500	\$ 3,500	<b>\$130,000</b>
<b>Total Budget</b>	<b>\$13,500</b>	<b>\$11,500</b>	<b>\$ 669,000</b>	<b>\$ 86,000</b>	<b>\$780,000</b>

\* EPA defines equipment as items that cost \$5,000 or more. Items costing less than \$5,000 are considered supplies.

\*\* Cost share must be included as appropriate in any combination of the first six lines of the chart, and not in the "Other" line item.

#### 4. WORKPLAN TASKS:

##### Task 1: Cooperative Agreement Oversight

<b>Task 1 - Cooperative Agreement Oversight Subtasks (Commitments) Pre-Cleanup</b>	<b>Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)</b>	<b>Anticipated Accomplishment Date(s) (Month/Year)</b>	<b>Actual Accomplishment Date(s)</b>
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<p><b>Obtain QEP Services:</b></p> <ul style="list-style-type: none"> <li>• Prepare Request For Proposals/Qualifications, evaluate applications, conduct interviews, hire contractor</li> <li>• Prepare scope of work</li> <li>• Prioritize, track and evaluate contractor products</li> <li>• Conduct periodic project status meetings with contractor to discuss project issues and priorities</li> <li>• Conduct annual performance evaluations for contractor</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>• High quality contractor work products that meet the recipient's and EPA's expectations</li> <li>• Confirmation in quarterly report that contractor selection was completed and made</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• Maintain effective work force to meet workplan commitments</li> </ul>	12/31/22	
<p><b>Reporting:</b></p> <ul style="list-style-type: none"> <li>• Prepare MBE/WBE annually, and FFR annually and at grant closeout</li> <li>• Enter site data in ACRES</li> <li>• Prepare Quarterly Reports via ACRES</li> <li>• Prepare final report and grant closeout material</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>• Quarterly reports and other forms; updated ACRES database; final report and closeout forms</li> <li>• "Success Story" fact sheets</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• Ensures compliance with Terms &amp; Conditions reporting requirements</li> </ul>	1/30/23 ACRES updates and Quarterly Reports every quarter; MBE/WBE forms annually by 9/30; SF425 FFR annually by 10/30	
<p><b>Records:</b></p> <ul style="list-style-type: none"> <li>• Maintain grant files</li> <li>• Maintain site project files</li> <li>• Maintain financial records</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>• Accurate and complete files suitable for audit purposes</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• High quality project records reflective of the work performed</li> </ul>	10/1/22 and thereafter	
<p><b>Request for Reimbursements or Advances:</b></p>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>• Drawdowns from ASAP</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• Reduce unliquidated obligations</li> </ul>	10/1/22 and thereafter	
<p><b>Travel &amp; Training</b></p> <ul style="list-style-type: none"> <li>• Attend brownfields related meetings, training sessions and conferences</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>• Attend Brownfields Conference in Oklahoma City</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• Improve Brownfields knowledge and expand networking opportunities</li> </ul>	8/16-19/22	

**EXAMPLE Task 2: Community Outreach & Engagement**

Task 2 – Community Outreach & Engagement Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
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<p><b>Work with CBOs identified in proposal to ensure commitments are implemented</b></p>	<p>Outputs:  <ul style="list-style-type: none"> <li>• Commitments that were identified in proposal are implemented</li> </ul> Outcomes:  <ul style="list-style-type: none"> <li>• Increase coordination with stakeholders and others</li> </ul> </p>	<p>6/30/23</p>	
<p><b>Prepare Community Relations Plan</b>  <ul style="list-style-type: none"> <li>• Prepare plan to involve public in cleanup activities</li> </ul> </p>	<p>Outputs:  <ul style="list-style-type: none"> <li>• Plan for involving the community in cleanup activities</li> </ul> Outcomes:  <ul style="list-style-type: none"> <li>• Improve understanding and participation in cleanup and redevelopment process</li> </ul> </p>	<p>6/30/23</p>	
<p><b>Establish Information Repository</b></p>	<p>Outputs:  <ul style="list-style-type: none"> <li>• Repository of documents which allows public to review site assessment &amp; cleanup history</li> </ul> Outcomes:  <ul style="list-style-type: none"> <li>• Improve understanding of how cleanup alternative was selected</li> </ul> </p>	<p>9/30/23</p>	
<p><b>Implement 30-Day Public Comment Period on ABCA</b></p>	<p>Outputs:  <ul style="list-style-type: none"> <li>• Allow for review and comment of cleanup related documents</li> </ul> Outcomes:  <ul style="list-style-type: none"> <li>• Allow for consensus on cleanup</li> </ul> </p>	<p>9/30/23</p>	
<p><b>Public Meetings</b></p>	<p>Outputs:  <ul style="list-style-type: none"> <li>• Meetings which inform public of cleanup activities and provide a chance for input &amp; comment</li> </ul> Outcomes:  <ul style="list-style-type: none"> <li>• Improve understanding of cleanup and allow for potential modifications based on public input</li> </ul> </p>	<p>12/31/23</p>	

### Task 3: Site-Specific Activities

Task 3 – Site Specific Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
<b>Hold a kickoff meeting with State, EPA and QEP</b>	Outputs: <ul style="list-style-type: none"> <li>• Held meeting</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Ensure all agencies are in agreement with cleanup plan</li> </ul>	3/31/23	
<b>Ensure Site is Enrolled in VCP</b> <ul style="list-style-type: none"> <li>• Ensure the grantee has enrolled site in the applicable state response program</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Site is enrolled in applicable state response program</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Cleanup is in compliance with state response program</li> </ul>	6/30/23	
<b>Historic Preservation</b> <ul style="list-style-type: none"> <li>• Assist EPA project Officer in collecting information and determining if Section 106 applies</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Information and reports required to comply with Section 106 Historic Preservation requirements</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Compliance with Section 106 Historic Preservation requirements</li> </ul>	12/31/23	
<b>Prepare Analysis of Brownfields Cleanup Alternatives (ABCA)</b>	Outputs: <ul style="list-style-type: none"> <li>• Approved ABCA documenting how and why cleanup alternative was selected</li> <li>• ABCA placed in information repository, etc.</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Ensure proper cleanup alternative is selected and communicated to the public</li> </ul>	9/30/23	
<b>Green and Sustainable Remediation (GSR)</b> <ul style="list-style-type: none"> <li>• Incorporate green and sustainable remediation principles/techniques into your project</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• GSR language in ABCA and RFP</li> <li>• Track and report GSR in quarterly reports</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Greener and more sustainable cleanup</li> </ul>	12/31/23	

<p><b>Prepare Decision Document</b></p> <ul style="list-style-type: none"> <li>Document results of public comment period and public meeting to include comments received, public meeting attendance, response to relevant comments, selection of final cleanup remedy, any changes to the final cleanup remedy, etc.</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>Memo or letter, with appropriate attachments</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>Ensure that public comment process is documented and final cleanup remedy is selected</li> </ul>	3/31/23	
<p><b>Prepare Remedial Design &amp; Engineering Documents</b></p> <ul style="list-style-type: none"> <li>Prepare appropriate remedial design documents for state response program, engineering design documents for cleanup contractors to perform work (including Davis-Bacon requirements), and a budget detailing how EPA funds will be used to cleanup sites</li> </ul>	<ul style="list-style-type: none"> <li>Approved remedial action and engineering/design documents and an approved budget</li> <li>Place documents in information repository, etc.</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>Ensure cleanup will be done in compliance with state response program and EPA funds will be used for eligible costs</li> </ul>	6/30/23	
<p><b>Prepare Site Specific Quality Assurance Project Plan and Health and Safety Plan</b></p> <ul style="list-style-type: none"> <li>Prepare a SSQAPP for any environmental post cleanup sampling to be conducted on sites and submit to EPA for approval</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>EPA approved SSQAPP</li> <li>Place SSQAPP in information repository</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>Ensure proper confirmatory testing methods and analytical data results are achieved</li> </ul>	6/30/23	

#### Task 4: Cleanup Oversight

Task 4 – Cleanup Oversight Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
<p><b>Oversight of cleanup activities</b></p> <ul style="list-style-type: none"> <li>QEP conducts appropriate site inspections during remediation to ensure compliance with cleanup plans</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>Number of inspections</li> <li>Site reports by QEP</li> <li>Documents placed in information repository</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>Ensure cleanup is conducted in compliance with VCP</li> </ul>	12/31/24	
<p><b>Davis-Bacon Documentation</b></p> <ul style="list-style-type: none"> <li>Conduct site inspections to ensure proper wage rates and posters are available to workers on-site</li> <li>Collect, review and maintain payrolls</li> <li>Conduct on-site labor interviews</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>Payrolls, labor interviews, etc.</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>Ensure compliance with Davis-Bacon requirements</li> </ul>	12/31/24	



<b>Collection of post-cleanup samples</b>	Outputs: <ul style="list-style-type: none"> <li>• Number of samples and analytical results</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Ensure cleanup has met VCP cleanup levels</li> </ul>	3/31/25	
<b>Cleanup Documentation</b> <ul style="list-style-type: none"> <li>• Prepare and submit close-out documentation to state indicating that cleanup is complete and protective to human health and the environment and identifies any institutional controls and long-term monitoring</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Final cleanup reports documenting cleanup is complete</li> <li>• Place documents in repository, etc.</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• State approval of cleanup and ensure cleanup is protective of human health and the environment</li> </ul>	6/30/25	
<b>Cleanup Complete Documentation</b> <ul style="list-style-type: none"> <li>• Receive final cleanup complete letter from state or LEP/LSP determination for CT &amp; MA and submit to EPA</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Letter from State/LSP/LEP</li> <li>• Letter submitted to EPA</li> <li>• Placed letter or documentation in information repository, reported in ACRES, and quarterly reports, etc.</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Site is officially clean and ready for reuse</li> <li>• # Estimated number of brownfields property acres available for reuse</li> </ul>	6/30/25	

## 5. QUALITY ASSURANCE

Prior to undertaking confirmatory sampling, the Town of Stafford will prepare and submit a Quality Assurance Project Plan (QAPP) which meets the approval of the U.S. EPA Region I Brownfields Program. The QAPP will describe the sampling and analytical strategies, and the methods and procedures that will be used. QAPP approval will be obtained prior to performing any field activity.

## 6. PRE-AWARD COSTS

Town of Stafford requests the approval of pre-award costs for this cooperative agreement. It is estimated we will need \$10,000 to do the following activities: Hire a Qualified Environmental Professional (QEP).

## 7. BUDGET DETAIL - ATTACHMENT 1