

REVOLVING LOAN FUND WORKPLAN

City of Belfast, Maine

Workplan for CERCLA Section 104(k) Revolving Loan Fund Cooperative Agreement

Period of Performance: 7/1/2022-9/30/2027 (includes 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 brownfield 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 City of Belfast, Maine, as a general purpose unit of local government, was selected for a Revolving Loan Fund grant in the FY 2022 competition.

The City of Belfast will utilize this EPA Brownfields Revolving Loan Fund grant funding to establish, implement, and manage an impactful program to provide funding in the form of loans and subgrants, to be primarily used to remediate brownfields located within the City of Belfast. Specifically, the City will use this funding to maintain cooperative agreement-related files; reconstitute City’s existing Brownfields Selection Committee; attend and/or participate in conferences, trainings, courses, and workshops; obtain qualified professional services; develop loan and subgrant procedures; create and submit requests for reimbursements; conduct reporting; confirm commitments made by local community partners in original grant application; provide individual confidential responses to questions and/or concerns posed by residents, current property owners, prospective property purchasers, and/or prospective developers; develop new community outreach and engagement deliverables; prepare site-specific Community Involvement Plans; establish site-specific information repositories on the City’s website; implement 30-day public comment periods on Analyses of Brownfields Cleanup Alternatives (ABCAs); conduct public site-specific cleanup meetings; confirm site and borrower/subgrantee eligibility; ensure that borrowers/subgrantees have their sites enrolled in the Maine Department of Environmental Protection (MEDEP) Voluntary Response Action Program (VRAP); assist the EPA project officer in collecting information and determining if Section 106 reviews apply to site cleanups; conduct ABCA activities; incorporate green and sustainable remediation principles/techniques into cleanups; document results of public comment periods and public meetings; prepare appropriate remedial design documents for the MEDEP VRAP, engineering design documents for cleanup contractors to perform work, and a budget detailing how EPA funds will be used to clean up sites; prepare Site-Specific Quality Assurance Project Plans (SSQAPPs) and Health and Safety (H&S) Plans; conduct oversight of cleanup activities; conduct site inspections, conduct on-site interviews, and collect payroll documentation for Davis-Bacon Act compliance; collect post-cleanup samples; prepare and submit close-out documentation to the MEDEP VRAP; and receive Certificates of Completion (CoC) from MEDEP VRAP and submit them to EPA.

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 City of Belfast's Economic Development Director will serve as Project Manager and will carry out overall coordination of the cooperative agreement, assisted by other City of Belfast personnel, including but not limited to its Finance Director, its City Planner, and its City Attorney, with technical assistance and oversight to be performed by a Qualified Environmental Professional, and additional technical assistance and oversight to be provided through the MEDEP VRAP.

Describe your RLF Program:

The City of Belfast's Revolving Loan Fund Program will place an emphasis on identified priority sites (126 Church Street, 1 Miller Street) and on sites located within identified target areas (Census Block Groups 230270430001 and 230270430003). The City of Belfast's jurisdiction does not extend beyond its existing municipal boundaries, and as such, any and all sites (priority and non-priority) that will be assisted through this program will be located entirely within the City of Belfast.

The City of Belfast has, and will continue to have, the organizational capacity to effectively carry out all of the programmatic, administrative, and financial requirements of this grant. This program and grant will be directly managed by the Belfast Economic Development Director Thomas Kittredge. During his fifteen-year career in economic development, Mr. Kittredge has secured and implemented \$1,699,994, and has secured on behalf of other applicants an additional \$1,550,000, in EPA Brownfields Assessment and Cleanup Grants, and has served as the director of the City's Brownfields Assessment Program since its inception in 2011. He will be supported by the City's existing Brownfields Selection Committee, which has existed since 2011 when the City received its first EPA Brownfields Assessment Grant. If Mr. Kittredge were to leave his employment with the City of Belfast, direct management of the program and grant would pass to Jon Boynton, Belfast's City Planner and another active member of the Brownfields Selection Committee. The City's Finance Director, Theresa Butler, who possesses more than 20 years of progressively responsible experience in municipal finance, will serve as the financial manager of the grant, including tracking of expenditures, draw downs, and loan repayments. Ms. Butler and the rest of the City's Finance Department has experience in executing and managing a wide variety of financial agreements with outside entities. For legal assistance, including access agreements, the City will rely upon City Attorney Kristin Collins, who has practiced law since 2005 and currently practices with the Municipal Law and Finance Group of Preti Flaherty. Ms. Collins has a Bachelor of Arts from Colgate University and a Juris Doctor from the University of Maine School of Law, and is admitted to practice in Maine and the US District Court, District of Maine. The structure and the capacity of this team will ensure that this grant and revolving loan fund program will be successfully implemented within its period of performance.

Contact information for above identified personnel:

Thomas Kittredge (Project Manager): (207) 338-3370, extension 116; economicdevelopment@cityofbelfast.org
Jon Boynton: (207) 338-3370, extension 118; jboynton@cityofbelfast.org
Theresa Butler: (207) 338-3370, extension 111; financedirector@cityofbelfast.org
Kristin Collins: (207) 791-3292; kcollins@preti.com

Contact information for local community partners identified in original grant application (who are currently believed to still be at their positions):

Cloe Chunn (Board Member, Belfast Bay Watershed Coalition): (207) 338-1147; cloechunn@gmail.com
Susan Dupler (Belfast Public Health Nurse); (207) 505-4940; sdupler@wcgh.org
Donna Kelley (President and CEO, Waldo Community Action Partners); (207) 338-6809; dkelley@waldocap.org;
Brian Sites (VP, Business Development and Implementation, Volunteers of America Northern New England); (207) 373-1140; brian.sites@voanne.org

2. FUNDING

\$1,000,000

3. BUDGET

Budget Category	Task 1: Cooperative Agreement Oversight Activities	Task 2: Community Outreach and Engagement Activities	Task 3: Loan and Subgrant Activities	Task 4: Site Cleanup Oversight Activities	Totals
Personnel	\$1,264	\$1,634	\$6,428	\$1,264	\$10,590
Fringe Benefits	\$316	\$390	\$632	\$316	\$1,654
Travel	\$15,416	\$0	\$0	\$0	\$15,416
Supplies	\$4,400	\$200	\$200	\$40	\$4,840
Contractual	\$10,000	\$5,000	\$27,500	\$30,000	\$72,500
Other: Loans	\$0	\$0	\$500,000	\$0	\$500,000
Other: Subgrants	\$0	\$0	\$395,000	\$0	\$395,000
Equipment	\$0	\$0	\$0	\$0	\$0
Indirect Costs	\$0	\$0	\$0	\$0	\$0
Total Budget	\$31,396	\$7,224	\$929,760	\$31,620	\$1,000,000
Total Federal Funding	\$31,396	\$7,224	\$929,760	\$31,620	\$1,000,000
Cost Share	\$0	\$0	\$200,000	\$0	\$200,000

4. WORKPLAN TASKS

Task 1: Cooperative Agreement Oversight Activities

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)
Project Manager maintains cooperative agreement-related files	<p><i>Outputs:</i></p> <p>Accurate and complete files.</p> <p><i>Outcomes:</i></p> <p>Progress on the cooperative agreement will be able to be easily monitored; information that is required for audits will be able to be easily generated; and should turnover amongst City personnel occur during the cooperative agreement period, a smooth transition of Project Manager responsibilities to other City personnel will be facilitated.</p>	7/2022 and ongoing thereafter	

<p>Project Manager reconstitutes City’s existing Brownfields Selection Committee (this committee is the entity that will be involved in both the City’s Brownfields Assessment Program and its Brownfields Revolving Loan Fund Program)</p>	<p><i>Outputs:</i></p> <p>Reconstituted Brownfields Selection Committee; Brownfields Selection Committee meetings, meeting agendas, and meeting minutes.</p> <p><i>Outcomes:</i></p> <p>The Brownfields Selection Committee will remain an active and motivated working group that will now help to drive the City’s Brownfields Revolving Loan Fund Program, and will continue to include representatives of allied local community partners.</p>	<p>8/2022</p>	
<p>Project Manager, City personnel, and Brownfields Selection Committee members attend and/or participate in conferences, trainings, courses, and workshops:</p> <p>1) attend and/or participate in additional brownfields-related conferences, trainings, courses, and workshops</p> <p>2) attend and/or participate in National Brownfields Training Conferences</p> <p>3) attend and/or participate in New England/EPA Region 1 Brownfields Summits/Conferences</p>	<p><i>Outputs:</i></p> <p>Attendance and/or participation at National Brownfields Training Conference(s) and at additional brownfields-related conferences, trainings, courses, and workshops.</p> <p><i>Outcomes:</i></p> <p>City personnel and Brownfields Selection Committee members will improve their brownfields-related knowledge and expertise, and will develop relationships with developers of brownfields.</p>	<p>10/2022 and ongoing thereafter: additional brownfields-related conferences, trainings, courses, and workshops</p> <p>2023 and 2025: anticipated future National Brownfields Training Conferences</p> <p>2024 and 2026: anticipated future New England/EPA Region 1 Brownfields Summits/Conferences</p>	
<p>Obtain qualified professional services:</p> <p>1) Project Manager and a working group (comprised of a portion of, or the entirety of, the membership of the Brownfields Selection Committee) to conduct/oversee process and make recommendations to City Council</p> <p>2) Project Manager and the working group creates and issues requests for qualifications and/or proposals for: 1) a Qualified Environmental Professional (QEP); and 2) a financial manager/underwriter</p> <p>(For legal services, the City will utilize its existing City Attorney, Kristin Collins. Ms. Collins is not a typical City of Belfast employee, as she is contracted to provide legal services to the City, but for budgetary purposes,</p>	<p><i>Outputs:</i></p> <p>Requests for qualifications and/or proposals; documentation of processes with fair and open competitions; contracts for services.</p> <p><i>Outcomes:</i></p> <p>The City will obtain access to the necessary expertise; the City will ensure that EPA’s requirements for fair and open competitions are met.</p>	<p>11/2022: QEP</p> <p>12/2022: financial manager/underwriter</p>	

<p>her time will be tracked under personnel, as opposed to contractual.)</p> <p>3) City Council approves/modifies/rejects the Project Manager’s and the working group’s recommendations</p> <p>4) City enters into contract(s) for services</p>			
<p>Project Manager, Brownfields Selection Committee, and QEP develop loan and subgrant procedures:</p> <p>1) develop loan and subgrant processes</p> <p>2) develop loan and subgrant evaluation criteria</p> <p>3) develop loan and subgrant documents (applications, agreements, promissory notes, etc., that include all applicable federal environmental and cross-cutting requirements (i.e., Davis-Bacon))</p>	<p><i>Outputs:</i></p> <p>Loan and subgrant processes, evaluation criteria, and documents.</p> <p><i>Outcomes:</i></p> <p>There will be an increased probability that the most promising brownfields will be able to participate in the City’s Brownfields Revolving Loan Fund Program.</p>	<p>1/2023</p>	
<p>Project Manager creates and submits requests for reimbursements</p>	<p><i>Outputs:</i></p> <p>Requests for reimbursement submitted to, and reimbursements received from, EPA.</p> <p><i>Outcomes:</i></p> <p>Unliquidated obligations will be reduced; and the City’s cash flow will be protected.</p>	<p>10/2022 and ongoing thereafter (typically on a monthly basis, as City pays invoices from QEP and financial manager/underwriter</p>	
<p>Reporting by QEP and Project Manager:</p> <p>1) prepare, review, and submit quarterly reports to the Assessment, Cleanup and Redevelopment Exchange System (ACRES)</p> <p>2) prepare, review, and submit additional site information to ACRES</p> <p>3) prepare, review, and submit Minority-Owned Business Enterprises/Woman-Owned Business Enterprises (MBE/WBE) Forms</p> <p>4) prepare, review, and submit SF-425 Federal Financial Reports</p>	<p><i>Outputs:</i></p> <p>20 quarterly reports; 5 MBE/WBE reports; 5 SF-425 Federal Financial Reports; final report; other grant closeout materials.</p> <p><i>Outcomes:</i></p> <p>ACRES will be kept current, providing valuable and timely information to multiple stakeholders.</p>	<p>1/2023, 4/2023, 7/2023, 10/2023, 1/2024, 4/2024, 7/2024, 10/2024, 1/2025, 4/2025, 7/2025, 10/2025, 1/2026, 4/2026, 7/2026, 10/2026, 1/2027, 4/2027, 7/2027, and 10/2027: quarterly reports</p> <p>2/2023 and ongoing thereafter: additional site information</p> <p>9/2023, 9/2024, 9/2025, 9/2026, and 9/2027: MBE/WBE Forms</p>	

5) prepare, review, and submit final report and grant closeout materials		10/2023, 10/2024, 10/2025, 10/2026, and 10/2027: SF-425 Federal Financial Reports 1/2028: final report and grant closeout materials	
--	--	--	--

Task 2: Community Outreach and Engagement Activities

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)
Project Manager confirms commitments made by local community partners in original grant application	<i>Outputs:</i> Specific listed commitments. <i>Outcomes:</i> Clear expectations will be established between the City and its local community partners regarding responsibilities associated with the City’s Brownfields Revolving Loan Fund Program.	7/2022	
QEP and Project Manager provide individual confidential responses to questions and/or concerns posed by residents, current property owners, prospective property purchasers, and/or prospective developers	<i>Outputs:</i> Phone conversations; e-mails. <i>Outcomes:</i> Residents, current property owners, prospective property purchasers, and/or prospective property developers will receive targeted expert information that will inform their decisions and/or effectively address their concerns.	11/2022 and ongoing thereafter	
Develop new community outreach and engagement deliverables: 1) Project Manager writes and issues news release 2) Project Manager places program information on portion of City’s website 3) QEP and Project Manager develop informational brochure	<i>Outputs:</i> News release; public service announcement; interview; program information on City’s website; informational brochure; frequently-asked questions; public informational meeting; Facebook posts; e-newsletters and e-mails; participation in informational meetings. <i>Outcomes:</i>	1/2023: news release 1/2023 and ongoing: program information on City’s website 2/2023: informational brochure; frequently-asked questions	

<p>4) QEP and Project Manager develop frequently-asked questions</p> <p>5) QEP and Project Manager develop and host public informational meeting</p> <p>6) City and local community partners create and promote Facebook posts</p> <p>7) local community partners create and distribute e-newsletters and e-mails</p> <p>8) QEP and Project Manager participate in informational meetings of area real estate professionals, banking professionals, and/or other brownfield-aligned groups (at least 2)</p>	<p>The community will have access to current and correct information regarding the City's Brownfields Revolving Loan Fund Program. There will be a higher likelihood of new little-known or unknown brownfields being brought forward for consideration to enter the City's Brownfields Revolving Loan Fund Program; there will be increased awareness throughout the community regarding brownfields and the City's Brownfields Revolving Loan Fund Program.</p>	<p>3/2023: public informational meeting</p> <p>3/2023 and ongoing thereafter: Facebook posts; e-newsletters and e-mails</p> <p>5/2023 and ongoing thereafter: informational meetings of area real estate professionals, banking professionals, and/or other brownfield-aligned groups</p>	
<p>Prepare site-specific Community Involvement Plan</p>	<p><i>Outputs:</i></p> <p>Site-specific community involvement plans.</p> <p><i>Outcomes:</i></p> <p>Improved understanding and participation in cleanups and in the redevelopment process.</p>	<p>2/2023 and ongoing thereafter, as projects go through program</p>	
<p>Establish site-specific information repository on City's website</p>	<p><i>Outputs:</i></p> <p>Information repository.</p> <p><i>Outcomes:</i></p> <p>Improved understanding of how cleanup alternatives were selected.</p>	<p>2/2023 and ongoing thereafter, as projects go through program</p>	
<p>Implement 30-day public comment period on Analyses of Brownfields Cleanup Alternatives (ABCAs)</p>	<p><i>Outputs:</i></p> <p>Number of public comment periods implemented.</p> <p><i>Outcomes:</i></p> <p>Allow for review and comment on cleanup related documents, and for consensus on cleanups.</p>	<p>2/2023 and ongoing thereafter, as projects go through program</p>	
<p>Conduct public site-specific cleanup meetings</p>	<p><i>Outputs:</i></p> <p>Number of public site-specific cleanup meetings conducted.</p> <p><i>Outcomes:</i></p>	<p>2/2023 and ongoing thereafter, as projects go through program</p>	

	Improved understanding of cleanups, allowance for modifications based on public input.		
--	--	--	--

Task 3: Loan and Subgrant Activities

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)
Confirm site and borrower/subgrantee eligibility	<p><i>Outputs:</i></p> <p>Number of sites and borrowers/subgrantees with confirmed eligibility.</p> <p><i>Outcomes:</i></p> <p>Maintaining efficiency of City of Belfast Brownfields Revolving Loan Fund Program.</p>	2/2023 and ongoing thereafter, as projects go through program	
Ensure that borrower/subgrantee has enrolled site in Maine Department of Environmental Protection Voluntary Response Action Program (MEDEP VRAP)	<p><i>Outputs:</i></p> <p>Number of sites with confirmed enrollment.</p> <p><i>Outcomes:</i></p> <p>Assurance that cleanup is in compliance with MEDEP VRAP.</p>	2/2023 and ongoing thereafter, as projects go through program	
Assist EPA project officer in collecting information and determining if a Section 106 review applies to site cleanup	<p><i>Outputs:</i></p> <p>Information and reports required to comply with Section 106 historic preservation requirements.</p> <p><i>Outcomes:</i></p> <p>Compliance with Section 106 historic preservation requirements.</p>	2/2023 and ongoing thereafter, as projects go through program	
<p>ABCA activities (if ABCA is to be developed by the QEP):</p> <p>1) Brownfields Selection Committee (with assistance from QEP) reviews and decides upon request from current property owner, prospective property purchaser, and/or prospective property developer to conduct ABCA</p> <p>2) QEP develops ABCA</p> <p>3) QEP submits draft ABCA report to Project Team</p>	<p><i>Outputs:</i></p> <p>ABCAs for the 2 priority sites (126 Church Street and 1 Miller Street); ABCAs for non-priority sites; requests reviewed and approved/denied; Brownfields Selection Committee meetings, meeting agendas, and meeting minutes; final ABCAs for the 2 priority sites (126 Church Street and 1 Miller Street) and for non-priority sites placed on the City’s website.</p>	2/2023 and ongoing thereafter, as projects go through program	

<p>4) Project Team reviews draft ABCA report and provides comments to QEP</p> <p>5) QEP finalizes and submits ABCA report</p> <p>ABCA activities (if ABCA is to be developed by the subgrantee's representative):</p> <p>1) QEP reviews ABCA for adequacy and compliance with EPA rules and regulations</p> <p>ABCA activities (whether ABCA is developed by QEP or by subgrantee's representative)</p> <p>1) QEP, Project Manager, and if applicable, City personnel, discuss final ABCA report findings and possible next steps with current property owner, prospective property purchaser, and/or prospective property developer</p> <p>2) Project Manager places final ABCA report on the City's website</p>	<p><i>Outcomes:</i></p> <p>Brownfields that have the highest potential will be most likely to undergo an ABCA and be well positioned for cleanup and site reuse/redevelopment.</p>		
<p>Incorporate green and sustainable remediation (GSR) principles/techniques into cleanups</p>	<p><i>Outputs:</i></p> <p>GSR language in ABCAs.</p> <p><i>Outcomes:</i></p> <p>Greener and more sustainable cleanups.</p>	<p>2/2023 and ongoing thereafter; before, during, and after remedial activities</p>	
<p>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.)</p>	<p><i>Outputs:</i></p> <p>Public comment and meeting documentation.</p> <p><i>Outcomes:</i></p> <p>Ensure that public comment process is documented and final cleanup remedy is selected.</p>	<p>2/2023 and ongoing thereafter, as projects go through program</p>	
<p>Prepare appropriate remedial design documents for MEDEP VRAP, engineering design documents for cleanup contractors to perform work (including Davis-Bacon requirements), and a budget detailing how EPA funds will be used to clean up sites</p>	<p><i>Outputs:</i></p> <p>Approved remedial action and engineering/design documents; approved budget.</p> <p><i>Outcomes:</i></p>	<p>2/2023 and ongoing thereafter, as projects go through program</p>	

	Ensure cleanup will be done in compliance with MEDEP VRAP; ensure that EPA funds will be used for eligible costs.		
Prepare Site-Specific Quality Assurance Project Plan (SSQAPP) and Health and Safety Plan	<p><i>Outputs:</i></p> <p>Number of approved SSQAPPs and Health and Safety Plans.</p> <p><i>Outcomes:</i></p> <p>Ensure proper confirmatory testing methods and analytical data results are achieved.</p>	2/2023 and ongoing thereafter, as projects go through program	

Task 4: Site Cleanup Oversight Activities

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)
QEP conducts oversight of cleanup activities	<p><i>Outputs:</i></p> <p>Site reports.</p> <p><i>Outcomes:</i></p> <p>Appropriate site inspections conducted during remediation will ensure compliance with cleanup plans and with MEDEP VRAP.</p>	2/2023 and ongoing thereafter; during remediation of sites	
QEP conducts site inspections, conducts on-site interviews, and collects payroll documentation for Davis-Bacon Act compliance	<p><i>Outputs:</i></p> <p>Payrolls; labor interviews.</p> <p><i>Outcomes:</i></p> <p>Ensure compliance with Davis-Bacon Act requirements.</p>	2/2023 and ongoing thereafter; during remediation of sites	
QEP and/or subgrantee's representative collects post-cleanup samples, as necessary	<p><i>Outputs:</i></p> <p>Number of samples and analytical results.</p> <p><i>Outcomes:</i></p> <p>Ensure cleanup has met MEDEP VRAP cleanup levels.</p>	2/2023 and ongoing thereafter; when remediation activities are complete	
QEP or subgrantee's representative prepares and submits close-out documentation to MEDEP VRAP	<p><i>Outputs:</i></p> <p>Final cleanup reports.</p> <p><i>Outcomes:</i></p>	2/2023 and ongoing thereafter; when remediation activities are complete	

	MEDEP VRAP approval of cleanup; assurance that cleanup is complete and protective to human health and the environment; identification of any required institutional controls and/or long-term monitoring.		
Receive Certificate of Completion from MEDEP VRAP and submit to EPA	<p>Outputs:</p> <p>Certificate of Completion from MEDEP VRAP; estimated number of brownfield property acres available for reuse.</p> <p><i>Outcomes:</i></p> <p>Site is officially clean and ready for reuse.</p>	2/2023 and ongoing thereafter; when remediation activities are complete	

5. QUALITY ASSURANCE

Prior to undertaking confirmatory sampling, the City of Belfast will ensure that borrowers and subgrantees prepare and submit a Quality Assurance Project Plan (QAPP) which meets with the approval of the U.S. EPA Region I Brownfields Program. The QAPP will describe the sampling and analytical strategies, methods and procedures approved by EPA that will be used in all project data collection.

6. PRE-AWARD COSTS

The City of Belfast requests the approval of pre-award costs for this cooperative agreement. It is estimated that the City will need \$2,000 to do the following activities: maintaining of cooperative agreement-related files (by Project Manager); and reconstituting City’s existing Brownfields Selection Committee (by Project Manager).

7. BUDGET DETAIL

Accompanying this workplan please find a spreadsheet providing budget details.

8. RLF COA

A COA will be accepted by the recipient as a component of the cooperative agreement’s Terms and Conditions. The COA dictates how post-closeout program income will be used for the continued operation of an RLF for brownfields cleanup, and/or other brownfields activities, as well as post-closeout progress reporting and ACRES reporting requirements. This COA is based on the FY22 RLF COA template. EPA plans to modify RLF COA templates every five years. EPA reserves the right to renegotiate the terms of this RLF COA every five years, in conjunction with the template change (e.g., next change will be in FY27). If the recipient agrees to continue to operate the RLF under a COA past FY27, the recipient shall work with EPA’s Project Officer to update to the latest COA template. The City of Belfast affirms that it understands this requirement and that the signed agreement will be returned to the Project Officer within 30 days of the grant award.