

ATTACHMENT E: WORKPLAN

ASSESSMENT WORKPLAN
Big Sky Economic Development
Workplan for
CERCLA Section 104(k) Community Wide Assessment Cooperative Agreement
October 1, 2022 – September 30, 2026

The activities to be funded under this award support EPA’s FY 22-26 Strategic Plan Goal 6: Safeguard and Revitalize Communities; and the corresponding Objective 6.1: Clean Up and Restore Land for Productive Uses and Healthy Communities.

All workplan activities must reflect the application originally submitted in response to Funding Opportunity Notice: EPA-OLEM-OBLR-21-04_Assessment 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. 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. Big Sky Economic Development (BSED) was selected for Assessment funding in the FY 2022 competition.

BSED will focus on assessment and reuse planning of former industrial properties in downtown Billings and the East Billings Urban Renewal District (EBURD). This encompasses most of census tracts 4.02 and 2.00 and covers an area of approximately two miles by one-half mile. We will continue work started under our current Brownfields grant on a couple larger projects, initiate work on some identified priority sites, and determine other project opportunities through community outreach.

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 Thom MacLean, Big Sky Economic Development Project Manager assisted by Shanna Zier, BSED Controller and Kevin Heaney, BSED Counsel, with technical assistance and oversight to be performed by a Qualified Environmental Professional (QEP) and the VCP.

Describe your project and cleanup plan:

Big Sky Economic Development (BSED) will use this community-wide assessment grant to maintain the momentum developed in previous Brownfield grant cycles in the East Billings and Downtown Billings Urban Renewal Districts. These adjacent districts include industrial, commercial, professional, and residential properties that are ripe for investment and redevelopment especially given the assessment and reuse planning tools available through the EPA Brownfield program.

BSED and our community partners have identified eight possible priority projects in this area, including:

- SOCO Property – a 1.3-acre commercial property in the East Billings URD (EBURD)
- Pub Station Pavilion – a city block in the EBURD transitioning to an outdoor event venue
- Rimrock Foundation – 5 acres in the EBURD being converted into a mental healthcare facility
- Empire Steel – 6.7-acre former industrial area
- Schnitzer Steel – 7.4-acre steel manufacturing and recycling facility
- Billings Gazette Building – newspaper headquarters with redevelopment potential
- Elevation Church – former industrial building in EBURD
- Lewis & Clark Inn – older motel with redevelopment potential

These properties and others that will be identified through the course of the assessment grant period offer prime locations for redevelopment to housing, commercial, professional, and industrial purposes. Many are adjacent to the Fifth Avenue Corridor, a linear park connecting Downtown Billings to MetraPark (Montana’s largest events venue) through the East Billings Urban Renewal District. These projects will provide the catalyst needed to drive beneficial reuse, expansion, and redevelopment of blighted and underutilized land throughout Downtown and East Billings.

BSED has established a trust with community members and property owners regarding the ESAs. These connections and partnerships will help our efforts to promote and utilize this EPA Brownfield Assessment grant to improve our community by continuing our work with interested property owners to move forward projects otherwise delayed because of environmental concerns.

1. FUNDING: \$500,000 Hazardous Substances/Petroleum (these are now combined into one budget per the 2018 BUILD Act)

2. 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 proposal. If requesting different budget line-item amounts, a new 424a must be submitted)

BUDGET DETAIL

HAZARDOUS & PETROLEUM	Task 1 Program Management	Task 2 Community Outreach	Task 3 Site Assessment	Task 4 Cleanup/Reuse Planning	Total
Personnel	\$34,080	\$12,480	\$0	\$0	\$46,560
Fringe Benefits	\$10,224	\$3,744	\$0	\$0	\$13,968
Travel	\$7,600	\$700	\$0	\$0	\$8,300
Equipment*	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0
Contractual	\$0	\$10,000	\$326,172	\$95,000	\$431,172
Other: Specify	\$0	\$0	\$0	\$0	\$0
Total	\$51,904	\$26,924	\$326,172	\$95,000	\$500,000

* Per 2CFR200 equipment is defined as per unit cost \$5000 or more. Items costing less than \$5000 are considered supplies.

4. WORKPLAN TASKS

Task 1: Cooperative Agreement Oversight (*Utilize task descriptions from proposal.*)

Task 1 - Cooperative Agreement 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)
Obtain QEP services: <ul style="list-style-type: none"> • Prepare Request for Proposals and/or Qualifications, evaluate applications, conduct interviews, hire qualified environmental contractor • Conduct annual performance evaluations on contractor • Obtain legal services for title searches, regulation interpretations, etc. 	Outputs: <ul style="list-style-type: none"> • RFP/RFQ; documentation of meeting of open competition; contract for scope of services • Performance evaluation reports, and applicable corrective actions Outcomes: <ul style="list-style-type: none"> • High quality products and services to meet project needs • Maintain a high level of work effort 	October – November 2022 Annual Evaluations Legal services as needed	
Reporting: <ul style="list-style-type: none"> • Prepare quarterly reports, MBE/WBE semi-annually, and FFR form at the end of the reporting period • Enter site data in ACRES • Prepare final report describing how each item in the workplan was addressed and grant closeout material 	Outputs: <ul style="list-style-type: none"> • Quarterly reports and other forms; updated ACRES database; final report and closeout forms Outcomes: <ul style="list-style-type: none"> • Regular communication of project status and next steps; current database for congressional reporting 	Quarterly reports every quarter; MBE/WBE forms 3/30 & 9/30; ACRES updated when site activities occur	
Records: <ul style="list-style-type: none"> • Maintain grant files • Establish and maintain administrative record • Maintain site project files • Maintain financial records 	Outputs: <ul style="list-style-type: none"> • Accurate and complete files suitable for audit purposes Outcomes: <ul style="list-style-type: none"> • High quality project records reflective of the work performed 	Continuously throughout grant period	
Requests for Reimbursements via ASAP payment system	Outputs: <ul style="list-style-type: none"> • Forms submitted to RTP- EPA Finance Center for payment Outcomes: <ul style="list-style-type: none"> • Reduce unliquidated obligations 	Continuously/as needed throughout grant period	
Training: <ul style="list-style-type: none"> • Attend EPA Brownfields Conferences and other related workshops 	Outputs: <ul style="list-style-type: none"> • Attend Brownfields conference Outcomes: <ul style="list-style-type: none"> • Improve Brownfields knowledge and expand networking opportunities 	Dependent on timing of training offered	

Task 2: Community Involvement

Task 2 - Community Involvement 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)
<ul style="list-style-type: none"> Establish Brownfields steering committee Ensure that commitments made by stakeholders in proposal are implemented. 	<p>Outputs:</p> <ul style="list-style-type: none"> In-person meetings as needed with agenda, notes, and attendance; electronic updates as needed Commitments from CBOs <p>Outcomes:</p> <ul style="list-style-type: none"> An active and motivated workgroup driving Brownfields initiatives, comments/recommendations of projects 	<p>October 2022</p> <p>At least quarterly</p>	
<p>Develop Outreach Materials:</p> <ul style="list-style-type: none"> Create brochure targeting private & public property owners, lenders and developers Create FAQ fact sheet Update website 	<p>Outputs:</p> <ul style="list-style-type: none"> 300 brochures/FAQ factsheet; create an easy to navigate and informative website to engage public <p>Outcomes:</p> <ul style="list-style-type: none"> Up-to-date outreach tools to promote project work and disseminate information 	<p>Continual/as needed throughout grant period</p>	
<p>Implement outreach strategy in target areas:</p> <ul style="list-style-type: none"> Meet w/ local community organizations and inform elected officials Publish program info in local papers and post notices in town halls & community centers 	<p>Outputs:</p> <ul style="list-style-type: none"> Give BF presentations at 4 meetings, Minimum Two rounds of ads/postings in target areas <p>Outcomes:</p> <ul style="list-style-type: none"> Improve community knowledge on BF issues and identify potential BF sites Direct effort to meet needs and desires of community 	<p>Continual throughout grant period</p>	
<p>Hold local public meeting on Phase I and Phase II sites:</p> <ul style="list-style-type: none"> Discuss ESA results, and potential cleanup and redevelopment plans 	<p>Outputs:</p> <ul style="list-style-type: none"> Minimum 4 local public meetings with presentation materials, attendance list <p>Outcomes:</p> <ul style="list-style-type: none"> Encourage public participation and support of BF project(s) going forward 	<p>As needed and available throughout grant</p>	

Task 3: Site Inventory and Phase I Assessments

Task 3 - Site Inventory & Phase I Assessments 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)
Site inventory: <ul style="list-style-type: none"> Gather recognized and potential brownfields sites in target areas Enter sites on GIS mapping tool 	Outputs: <ul style="list-style-type: none"> GIS map of potential BF sites Outcomes: <ul style="list-style-type: none"> Graphical capturing of BF sites for planning and outreach work 	Initial mapping – February 2023; Final map – September 2025	
Site prioritization and eligibility determination: <ul style="list-style-type: none"> Convene steering committee meeting to rank and prioritize sites Choose initial sites for Phase I investigation Evaluate site access issues For each selected site, provide site eligibility information to EPA (or State for petroleum sites) for review Obtain EPA (or State, if petroleum determination is required) signature for site eligibility determination 	Outputs: <ul style="list-style-type: none"> Planning meetings; 5 eligible sites identified in initial inventory search Estimate 5 additional eligible sites identified during remainder of grant Outcomes: <ul style="list-style-type: none"> 10 Brownfield sites identified with the highest redevelopment and community benefit potential in target area(s) 	Initial Steering cmtte meeting – October 2022 Continual communication and identification throughout grant period	
Area-Wide Planning: <ul style="list-style-type: none"> Identify a brownfield-impacted area (neighborhood, district, city block, etc.) Develop strategies for the reuse of existing infrastructure in the area 	Outputs: <ul style="list-style-type: none"> Produce an area-wide plan for the brownfield impacted area Create a set of area-wide strategies for assessment, cleanup, and reuse measures Outcomes: <ul style="list-style-type: none"> Future uses of at least 10 properties in the area wide plan has been identified Next steps to implement the plan have been identified 	June 2023 June 2023	
Phase I investigations: <ul style="list-style-type: none"> Conduct planning meeting with contractor to discuss approved sites Contractor obtains access agreement and performs Phase I investigation Contractor submits draft Phase I report to project team members Team reviews/comments on draft Phase I Preparation of Phase I AAI Checklist for EPA Contractor submits final Phase I report to project team members 	Outputs: <ul style="list-style-type: none"> Planning meetings 10 1 Phase I Report updated ACRES database Outcomes: <ul style="list-style-type: none"> 10 High potential Brownfields site assessed through Phase I Total acres assessed through Phase I 	Quarterly Phase I assessments will be completed within 90 days.	

Task 4: Site-Specific Activities

Task 4 – Phase II Assessments & Cleanup Planning 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>Phase II preparation:</p> <ul style="list-style-type: none"> • Meet with steering committee to review Phase I results and project direction • Obtain EPA approval to conducting Phase II • Meet with contractor to Plan Phase II • Encourage contractor to maximize efficiencies and minimize negative impacts of site assessments by incorporating green and sustainable remediation (GSR) techniques that are applicable to Phase II assessment activities 	<p>Outputs:</p> <ul style="list-style-type: none"> • Project planning meetings • 1 approved generic QAPP • 4 sites approved for Phase II investigation <p>Outcomes:</p> <ul style="list-style-type: none"> • 4 high priority sites identified for further investigation and potential redevelopment 	<p>As needed June 2023</p> <p>June 2023 December 2023 April 2024 December 2024</p>	
<p>Phase II investigation:</p> <ul style="list-style-type: none"> • Contractor submits draft site-specific QAPP addendum to project team for review and comments • EPA/state approval is obtained for final site-specific QAPP • Contractor performs field work according to plan • Grantee monitors site work and communicates any concerns with EPA/state • Grantee tracks green and sustainable site assessment efforts used during Phase II investigations • Contractor submits draft Phase II report to project team for review and comments • Contractor submits final Phase II report to project team • Project team & steering committee evaluate Phase II findings, and implement additional Phase II investigations as appropriate to delineate extent of contamination 	<p>Outputs:</p> <ul style="list-style-type: none"> • 4 approved site-specific QAPP Addenda (delineating extent of site contamination on 1 Brownfield site) • Phase II report(s) documenting the results • Updated ACRES database • Green and sustainable efforts reported in quarterly reporting <p>Outcomes:</p> <ul style="list-style-type: none"> • 4 high priority sites with complete Phase II assessments that are ready for cleanup and reuse planning • Total acres assessed through Phase II • Greener and more sustainable site assessment techniques utilized 	<p>August 2023 February 2024 July 2024</p> <p>Phase II assessments will be completed within 180 days.</p>	
<p>Cleanup & reuse planning:</p> <ul style="list-style-type: none"> • Throughout Phase II process, strategize with steering committee on reuse plans for the site • Conduct outreach to leverage developer/lender interest in the property • Meet with contractor to develop draft cleanup alternatives and remediation plans for the site 	<p>Outputs:</p> <ul style="list-style-type: none"> • 3 or more internal cleanup and reuse planning meeting(s) • 2 draft cleanup alternatives plan • 2 draft remedial action plan • GSR language in ABCA • updated ACRES database • 1 public meeting on project results 	<p>May 2023 November 2023 February 2024</p> <p>February 2024 September 2024</p> <p>Meeting</p>	

Task 4 – Phase II Assessments & Cleanup Planning 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)
<ul style="list-style-type: none"> • Incorporate GSR principles/techniques into Analysis of Brownfields Cleanup Alternatives (ABCA) • Perform public outreach and involvement in cleanup and reuse planning 	<ul style="list-style-type: none"> • Potential for developer / lender workshop and transaction forum Outcomes: <ul style="list-style-type: none"> • 2 Properties assessed through cleanup and reuse planning, and ready for cleanup and redevelopment • Acres ready for cleanup & redevelopment • Greener and more sustainable plans for cleanup 	April 2024 February 2024 ongoing	
Etc.			

5. QUALITY ASSURANCE

Prior to undertaking Phase II assessments, Big Sky Economic Development will prepare and submit a Quality Assurance Project Plan (QAPP) which meets the approval of U.S. EPA Region 8 Brownfields Program. The QAPP will describe the project, the sampling and analytical strategies, and the methods and procedures that will be used in all Phase II assessments. The Region 8 EPA QA crosswalk shall be submitted with each site-specific QAPP. QAPP approval will be obtained prior to performing any field activities.

6. PRE-AWARD COSTS

Big Sky Economic Development respectfully requests to spend up to \$2000 pre-award for costs related to procuring Request for Proposals to expediate the Brownfield process and be ready to start assessments as soon as possible.

7. COMPLIANCE WITH OTHER FEDERAL REQUIREMENTS

Big Sky Economic Development will comply with Federal requirements including but not limited to the following: Disadvantaged Business Enterprise (DBE) requirements found at 40 CFR Part 33; OSHA Worker Health & Safety Standard 29 CFR 1910.120; the Uniform Relocation Act; 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) and the Anti-Kickback Act (40 USC 276c) and Section 504 of the Rehabilitation Act of 1973 as implemented by Executive Orders 11914 and 11250.