

**WORK PLAN
FOR THE CERCLA AUTHORITY 104(K)(2)&(3)
PETROLEUM ASSESSMENT GRANT
COOPERATIVE AGREEMENT**

CALHOUN COUNTY, MICHIGAN

This project supports Environmental Results Goal 4, Healthy Communities and Ecosystems, Objective: 4.2 (Communities - Sustain, Cleanup, and Restore Communities and Ecological Systems that Support Them), Sub Objective: 4.2.3 (Assess, Cleanup and Redevelop Brownfields). Specifically, the recipient will inventory, characterize, assess, and conduct planning and community involvement activities to encourage revitalization and reuse of brownfields sites. The Project Period is three years.

CFDA: 66.818

CERCLA Authority: 104(k)(2)&(3)

DCN: STX

Budget FY: 08

Appropriation: E4

Budget Org: 05F0AG7

Object Class: 4114

Program Results Code (PRC): Petroleum 402D79EBP (Action Code: OP)

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Project Period: October 1, 2008 – September 30, 2011

The expected project outcomes are as follows:

- complete an inventory of Brownfields sites
- conduct up to 8 Phase I Environmental Site Assessments (ESAs)
- conduct up to 5 Phase II ESAs

- prepare up to 3 Baseline Environmental Assessments and/or Brownfields Redevelopment Plans
- conduct community outreach

I. Introduction

The County was previously awarded a U.S. EPA \$200,000 Hazardous Substances Brownfield Assessment Grant during March 2006. Continuation of a county-wide brownfields program is imperative because of anticipated “spin-off” development pressures arising from the imminent construction of a gaming casino in the County. The County is committed to manage that development consistent with its June 2005 Master Plan, which prioritizes preservation of agricultural lands and open space by defining and direction new development to development corridors and developed communities. Since most of the County’s brownfields are located in these corridors and other developed areas in the County’s communities and townships, proactive assessment of brownfields to prepare them for redevelopment will direct development to those locations, thus reducing development pressure on undeveloped areas and controlling sprawl.

In March 2008, the United States Environmental Protection Agency (USEPA) awarded Calhoun County (County) Brownfields Assessment Grant Funds for the assessment of properties community-wide in the County. The grant includes \$200,000 for the assessment of sites contaminated with petroleum. These funds will be used to inventory petroleum brownfield sites within the County, as well as investigate the historic uses of the properties and identify Recognized Environmental Conditions (RECs), determine the type, severity, and extent of environmental contamination, and development liability management and remedial strategies that will allow for safe and viable redevelopment/reuse of the properties.

II. Project Overview and Objectives

Once the USEPA Assessment Grant Cooperative Agreement is executed by both parties, the County will expand the existing brownfield program to include discovered petroleum sites. Specifically, the County will identify, evaluate, and select specific properties where it will utilize the grant monies. Site selection criteria will be comprised of several factors, including the following: results of an inventory of brownfield sites within the County, 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 County will 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, and remedial planning activities. Specifically, the \$200,000 grant budget will be used to achieve the following objectives:

- Complete a prioritized inventory of brownfields within the community to include petroleum sites;
- Conduct assessments of priority sites to prepare them for redevelopment;

- Fully investigate historic uses and identify Recognized Environmental Conditions (Phase I Environmental Site Assessment; ESA); and,
- Assess the nature and extent of potential contamination by hazardous substances (Phase II ESA).
- Conduct Michigan Baseline Environmental Assessments (BEAs) which offer environmental liability protections for future owners;
- Plan for environmental response actions that will allow safe use upon redevelopment (Interim Response Plan, Remedial Action Plan, Due Care Plan); and
- Facilitate ongoing community information and participation programs related to use of the Assessment Grant funds and potential brownfields redevelopment planning in the City.

III. Management and Coordination

The Calhoun County Department of Public Works is in the beginning stages of establishing a Brownfield Redevelopment Authority (BRA) under Michigan Public Act 381 of 1996, as amended. The BRA will have the authority to manage brownfield projects for the County, including conducting assessments, acquiring and remediating property, and authorizing the collection of incremental taxes from a brownfield redevelopment project to reimburse eligible environmental response actions. With direction from the BRA, the Calhoun County Department of Public Works (DPW) will manage and administer this grant. Mr. Kevin Henning, Interim Managing Director/Finance Director, will serve as the Project Contact for purposes of grant administration and implementation. Quarterly reports, financial reports, progress of the work plan, and the final summary report will be forwarded to the EPA Region 5 from the Project Director, Ms. Eichorst. As Project Director, Ms. Eichorst also will be responsible for coordination of grant work with the selected environmental consultant, which will be selected and retained in accordance with County procurement protocols and applicable federal procurement rules (40 CFR 31.36). She will also act as liaison between the EPA, the Calhoun County Department of Public Works, the Calhoun County BRA, the County's communities, the public, and any other stakeholders involved in projects resulting from this grant.

IV. Tasks and Schedule

The tasks described below assume a cooperative agreement between the County and the EPA is in place by the end of September 2008.

Task 1 – Site Inventory and Selection: The first step in the County's petroleum brownfields program will be to identify and inventory petroleum brownfields located within the County and constituent communities and townships. Initially, a form will be developed to guide and document data collection. After preparing the form, sites will be identified through community nominations, ground surveys, and Michigan Department of Environmental Quality (MDEQ) contaminated sites database searches. Applicable data will be collected and entered into the forms for sites. After completion of the forms, data will be entered into a Geographic Information System (GIS) database for sites which was established as part of the Hazardous Substances Assessment Grant the County previously received. Prioritization criteria will be

developed, the sites will be prioritized for assessment, and eligibility determinations will be made.

Task 1: Site Inventory and Selection		
Activities	Deliverables	To Be Completed By:
Develop a form for use in documenting data collection	Develop documentation data collection form	December 31, 2008
Identify and collect available information on sites If necessary, consultant will be contracted to assist.	Visits, tours, meetings with BRA, communities as well as private property owners. Articles in local newspapers, websites, and other information to solicit potential sites.	June 1, 2009
Database and mapping	Develop database of sites, enter information collected, and coordinate with County GIS.	July 1, 2009; however, revisions to the database will continue throughout grant cycle.
Prioritization of sites	Database to be updated with prioritization	August 1, 2009

Task 2 – Phase I ESAs: A brownfield consultant will be retained to provide environmental consulting services including the completion of Phase I ESAs in accordance with 40 CFR 312 (All Appropriate Inquiry) and ASTM Practice E 1527-05 “Standard Practice for Environmental Site Assessments.” The Phase I ESAs typically will be completed on eligible sites identified through the inventory and prioritization process discussed in Task 1. However, site selection may be adjusted to provide Phase I ESA services to support a proposed eminent brownfield redevelopment project. Other factors that may affect completion will be market demand, ability to gain site access, and community interest in the sites. Prior to beginning any Phase I ESA and spending any grant funds, a petroleum eligibility request and/or other necessary documentation will be submitted to the MDEQ for the State to make the eligibility determination. The cost estimate assumes that up to eight Phase I ESAs may be completed. A Property Profile Form will be prepared for each eligible site for which a Phase I is completed, and submitted with the quarterly report for the reporting period in which the Phase 1 was conducted.

Task 2: Conduct Phase I ESAs		
Activities	Deliverables	To Be Completed By:
Retain a brownfield consultant	Request for Qualification Proposal and Consultant Agreement	November 1, 2008
Site eligibility	MDEQ eligibility determination	Will be performed on a site-specific basis as needed throughout the grant cycle.
Conduct Phase I Assessment (completed by	None	Will be performed on a site-specific basis as needed

consultant)		throughout the grant cycle.
Complete Property Profile Form	Property Profile Form	Will continue throughout grant cycle

Task 3 – Conduct Phase II ESAs and Baseline Environmental Assessments

(BEAs): Upon completion of the project activities identified in Task 1 and 2, the County 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 County and the selected consultant will participate in a pre-Quality Assurance Project Plan (QAPP) conference call with USEPA. A QAPP then 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 BEA (Michigan Voluntary Cleanup Program liability protection document) 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. The cost estimate assumes that up to five Phase II ESAs will be completed, and three BEAs, when applicable, may be completed.

Task 3: Conduct Phase II ESAs and BEAs		
Activities	Deliverables	To Be Completed By:
Pre-QAPP conference call with USEPA and consultant. Preparation of a draft QAPP for EPA review (completed by consultant).	Draft QAPP	A Draft QAPP will be sent to the USEPA within two months following agency approval of the Cooperative Agreement.
Submittal of final QAPP incorporating any revisions required by EPA (completed by consultant)	Final QAPP	A Final QAPP will be sent to the USEPA within one month following receipt of USEPA reviewed Draft QAPP.
Submit SAP to EPA for approval (completed by consultant)	SAP	Will be prepared on a site-specific basis as needed throughout the grant cycle.
Prepare Health And Safety Plan(s)	HSP	Will be prepared on a site-specific basis as needed

		throughout the grant cycle.
Conduct Phase II ESAs (completed by consultant)	None	Will be prepared on a site-specific basis as needed throughout the grant cycle.
Phase II ESA Reporting (completed by consultant)	Phase II ESA Report	Will be prepared on a site-specific basis as needed throughout the grant cycle.
Prepare BEAs as appropriate (completed by consultant)	BEA Report	Will be prepared on a site-specific basis as needed throughout the grant cycle.

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 remediation feasibility studies, Interim response and/or Remedial Action Plans, and preparation of Brownfield Plans and Work Plans to support acquisition of tax increment financing for environmental response actions under P.A. Act 381. Meetings will be held with stakeholders to develop and review the most effective remedial options for each selected brownfield site and redevelopment. The County, BRA and brownfield consultant will work closely with the MDEQ and EPA in considering options for cleanup planning.

Task 4: Cleanup and Redevelopment Planning		
Activities	Deliverables	To Be Completed By:
Meeting to discuss possible remedial strategies	None	Will continue on an as needed basis throughout grant cycle
Development of Cleanup and Redevelopment Plans	Plans (to include but not limited to feasibility studies, Brownfield Plans, Work Plans, Remedial Action Plans, Due Care Plans) for submittal to MDEQ and/or EPA.	Will continue on an as needed basis throughout grant cycle.

Task 5 – Community Outreach: This task includes activities that will both initially inform communities, civic organizations, and citizen groups about the goals, objectives and operations of the Calhoun County Assessment Grant Program, and then keep them up-to-date on project progress through environmental outreach meetings, newsletters, and the County’s website, with significant opportunity for public interaction. The County intends to provide opportunities for students and other interested volunteers, as well as the many governmental units within the County, to work together and form a partnership in the inventory process as described in Task 1.

The community will be informed of project developments through the local media, outreach through the Calhoun County Community Development Department, the BRA, press releases, and the County’s website. The County will continue to work with other organizations which are

long-established partners in promoting sustainable growth within the county; such as the United Arts Council of Calhoun County, Albion College, Western Michigan University, and the Nottawaseppi Huron Band of Potawatomi Indians (Huron Band).

Task 5: Community Outreach		
Activities	Deliverables	To Be Completed By:
Update and maintain a link on County's web page regarding progress with the EPA grant, with a link to submit feedback	Improved County webpage, located at www.calhouncrc.net	December 1, 2008
Attend meetings, post notices, develop informational pieces, notices and advertisements and distribute	Brochures, fact sheets, and other information pieces on the program and available sites. Attendee list	Will continue throughout grant cycle.
Conduct informational meetings on projects	Attendee list; meeting minutes.	Will continue throughout grant cycle.
Update local economic development agencies on progress with EPA grant	None. Will be summarized in quarterly reports.	Will continue throughout grant cycle.

Task 6 – Programmatic Responsibilities: Eligible activities identified in this task are expenditures for travel to yearly USEPA brownfield conferences, travel related to project coordination in communities and townships, costs associated with preparing, printing and mailing project documents, preparing and submitting required quarterly and annual reporting documents, and setup and conducting operational meetings.

Task 6: Eligible Programmatic Costs and Travel		
Activities	Deliverables	To Be Completed By:
Attend and report on brownfields related conferences, project related travel, document preparation, and operational tasks.	None. Expenditures and costs will be reported in quarterly and/or financial reports.	Will continue throughout grant cycle.

V. Budget

As stated earlier, the County has received notice of one-\$200,000 grant award for assessment of sites contaminated by petroleum. A budget for the \$200,000 grant is provided in Table 1. The following is a brief description of the budget categories.

Personnel and Fringe Benefits: No EPA funds will be used for fringe benefits of the staff people involved with the administration of the EPA grant; fringe benefits are treated as in-kind contributions by the County. Personnel expenses will total \$7,000 for the project period; Calhoun County anticipates approximately 155 hours of staff time (at an average hourly rate of \$45) associated with eligible programmatic activities. Of the 155 hours, approximately 110 hours will be used in conjunction site inventory and programmatic responsibilities (Tasks 1 and 5), while the remaining approximately 45 hours will be used for preparing, printing and mailing project documents, and setting up and conducting operational meetings, as well as for one county representative to attend three regional and/or national Brownfield conferences (Task 6).

Travel: Total anticipated expenditures for travel is \$3,000. This figure accounts for the costs associated with regional and/or national conference attendance by one representative of the staff involved with the assessment project during the three years of the grant funding cycle. Annual Conferences will be those hosted by the EPA. All conference travel will be authorized with EPA Region 5 staff, prior to registration. Travel costs include airfare, rental car and/or mileage reimbursement, hotel accommodations, and subsistence expenses.

Supplies: The total anticipated cost of supplies is \$1,000. Expenditures for supplies would include costs associated with the publication, preparation, and distribution of community involvement and outreach activities (Task 5). This expenditure category also includes the purchase of consumable supplies for printers and plotters to produce maps, photographs, public notices, advertisements, plans, reports, and other materials and equipment for community involvement activities.

Contractual: The total anticipated cost for contractual services is \$187,000. This figure accounts for the costs associated with the selected environmental consultant for the preparation of a QAPP and the conduct of, and reporting on, the Phase I and Phase II ESAs, and BEAs as appropriate. The cost estimate assumes that up to eight Phase I ESAs will be completed, up to five Phase II ESAs will be completed, and if appropriate up to three BEAs will be completed. The cost estimate also assumes that up to two sites will have imminent development potential and developer interest and will thus require identified investigation and remediation planning services by the brownfield consultant retained through this grant. Also, consultant services costs have been included in the inventory process category, should County staff need assistance with implementation of a GIS database.

Other: The budget also includes \$2,000 for legal fees as necessary. This figure accounts for potential costs associated with gaining access to a site, inclusion of sites into a brownfield plan, and addressing potential liability issues related to a site transaction.

No additional budget categories have been identified at this time.

VI. Project Manager Profile

Kevin Henning, is the Interim Managing Director and Finance Director for the Department of Public Works and Parks and the Calhoun County Road Commission. The Road Commission and Boards of Public Works and Parks are responsible for all transportation, parks and public works functions for the County. The Calhoun County Road Commission, Department of Public Works and Parks use a unified approach for road, public works, planning, parks, and solid waste service delivery. Mr. Henning is responsible for all-financial, personnel, public relations, and operational and administrative functions.

While employed by Calhoun County, the County has received various state and federal grants including:

- Federal Highway and Bridge Grants;
- EPA Brownfield Hazardous Assessment Grant;
- EPA Wastewater Treatment Improvement Grants;

Mr. Henning holds a Bachelor of Business Administration degree from Siena Heights University, and is working towards a Master of Business Administration from Baker College with an expected Graduation date of May 2009. Mr. Henning has also repeatedly served as an instructor Kellogg Community College teaching finance courses. Professional memberships include the Advancing Government Accountability, Michigan Government Finance Officers Associations, and Accounting Manual Sub Committee of County Road Association of Michigan.

**TABLE 1 – BUDGET FOR U.S. EPA ASSESSMENT GRANT - PETROLEUM
CALHOUN COUNTY, MICHIGAN**

Budget Categories	Project Tasks						
(programmatic costs only)	Task 1 Site Inventory and Selection	Task 2 Phase I ESAs	Task 3 Phase II ESAs and BEAs	Task 4 Cleanup and Redevelopment Planning	Task 5 Community Outreach	Task 6 Eligible Programmatic Costs	Total Grant Budget
Personnel	\$2,000				\$3,000	\$2,000	\$7,000
Fringe Benefits							
Travel						\$3,000	\$3,000
Supplies					\$1,000		\$1,000
Contractual	\$13,000	\$28,000	\$135,000	\$7,000	\$4,000		\$187,000
Other (Legal)		\$1,000	\$1,000				\$2,000
Total Grant Budget	\$15,000	\$29,000	\$136,000	\$7,000	\$8,000	\$5,000	\$200,000

