

US EPA ARCHIVE DOCUMENT

**BROWNFIELDS CLEANUP REVOLVING LOAN FUND
MAJOR TASKS**

TASK	LENDER / LEAD AGENCY	BORROWER / SUBGRANTEE	STATE / QEP	EPA
General Requirements				
<i>Seeks approval from EPA that site and borrower/subgrantee are eligible to receive EPA brownfields loan funds</i>	✓			
<i>EPA reviews site and borrower/subgrantee for eligibility (State does petroleum determination where applicable)</i>				✓
<i>Assist EPA in complying with Historic Preservation Act for site cleanup</i>	✓	✓		
<i>Site must be enrolled in the appropriate State response program to be eligible to receive federal brownfields cleanup funds</i>		✓		
<i>Designates an environmental project manager to review the proposed cleanup plans and actions</i> <ul style="list-style-type: none"> ■ Must be an independent third-party individual and can not be the borrower's environmental contractor. ■ May be an environmental contractor or the State. 	✓			
Plan for Community Involvement				
<i>Designates Community Relations Spokesperson</i> <ul style="list-style-type: none"> ■ Spokesperson must be an employee of the lead agency 	✓			
<i>Prepares a draft Community Relations Plan (CRP) and submits to EPA for review</i> <ul style="list-style-type: none"> ■ CRP must be prepared before the 'analysis of cleanup alternatives' is made available for public review and comment. ■ CRP outlines steps to provide reasonable notice of proposed cleanup, opportunity for involvement, response to comments, and administrative records that are available to the public. ■ CRP may be prepared by either Lead Agency or Borrower/Subgrantee. ■ Lead Agency is responsible for ensuring CRP compliance. 	✓	✓		
<i>Reviews and comments on draft CRP</i>			✓	✓
<i>Establishes information repository and maintains administrative record for the site</i> <ul style="list-style-type: none"> ■ The repository must be established before the analysis of cleanup alternatives is made available for public review and comment. 	✓			
Analysis of Brownfields Cleanup Alternatives (ABCA)				
<i>Drafts a remedial planning document that includes an analysis of cleanup alternatives(ABCA)</i> <ul style="list-style-type: none"> ■ Identifies the objectives of the environmental response action and provides an analysis of cleanup alternatives. ■ Documents that the situation meets the need for an environmental response action. ■ Provides information pertaining to site background; threats to public health and/or the environment posed by the site; enforcement activities; and projected costs. ■ Identifies the proposed action, and explains the rationale for its selection. ■ ABCA may be included in remedial design documents (RAP). 		✓		
Conduct Community Involvement				
<i>Provides public notice of availability of draft ABCA document and conducts a 30-day public comment period</i>		✓		
<i>Conducts a public meeting during the 30-day public comment period to inform public of the proposed cleanup plans and to solicit comments</i>	✓	✓		
<i>Reviews & comments on the draft ABCA document</i>			✓	✓

TASK	LENDER / LEAD AGENCY	BORROWER / SUBGRANTEE	STATE / QEP	EPA
Decision Document				
<p><i>Prepares Decision Document identifying the selected cleanup for the site</i></p> <ul style="list-style-type: none"> ■ Includes response to all relevant comments during the public comment period. ■ Documents any changes to the final cleanup plan. ■ Can be included in final remedial action plan. ■ Usually in the form of a memo. 	✓			
Cleanup Plan				
<p><i>Develops and submits State-required remedial design and engineering documents (i.e., RAM, RAP, HASP, etc.) to the State or the designated environmental project manager for review</i></p> <ul style="list-style-type: none"> ■ This step may occur simultaneously with the submittal of the ABCA document. 	✓	✓		
<p><i>Reviews State-required remedial design and engineering documents and provides written comments (CT & MA) or approval (ME, RI, NH & VT) per State VCP</i></p> <ul style="list-style-type: none"> ■ In CT & MA, review & comments will be provided by the LEP or LSP. ■ In ME, RI, NH & VT, review & comments will be provided by the State. 			✓	
<p><i>Submits copy of written comments (CT & MA) or State approval letter (ME, RI, NH & VT) to EPA</i></p>	✓	✓		
<p><i>Submits budget of proposed cleanup to EPA that details activities to be funded with EPA funds</i></p>		✓		
<p><i>Reviews and approves budget of proposed cleanup activities</i></p>				✓
Quality Assurance Project Plan (QAPP)				
<p><i>Prepares quality assurance project plan if environmental sampling is to be conducted and submits to EPA for approval</i></p>		✓		
<p><i>Reviews and approves quality assurance project plan</i></p>				✓
Loan/Subgrant Agreement				
<p><i>Develops draft loan/subgrant agreement and submits to EPA for review</i></p>	✓			
<p><i>Reviews loan/subgrant agreement for inclusion of federal environmental and other cross-cutting requirements (such as Davis Bacon, ESA, NHPA, etc)</i></p>				✓
Cleanup Activities				
<p><i>Conducts periodic site visits during implementation</i></p> <ul style="list-style-type: none"> ■ Ensure compliance with approved plans ■ Ensure compliance with Davis Bacon requirements (payrolls, labor interviews, signage, etc.) 	✓		✓	
<p><i>Prepares cleanup closeout documentation at the conclusion of the cleanup and submits to State or designated QEP for review</i></p> <ul style="list-style-type: none"> ■ Documents that cleanup is complete and is protective of human health and the environment. ■ Identifies any institutional controls used and long-term monitoring requirements. 		✓		
<p><i>Reviews and provides written comments (CT & MA) or approval of the cleanup closeout documentation (ME, RI, NH & VT) per requirements of State VCP</i></p> <ul style="list-style-type: none"> ■ In CT & MA, review & comments will be provided by the LEP/LSP. ■ In ME, RI, NH & VT, review & comments will be provided by the State. 			✓	
<p><i>Submits copy of closeout documentation and/or State approval letter to EPA</i></p> <ul style="list-style-type: none"> ■ In CT & MA, closeout documentation or RAO will be provided by the LEP/LSP. ■ In ME, RI, NH & VT, cleanup complete letter will be provided by the State. 	✓			