

## BROWNFIELDS CLEANUP REVOLVING LOAN FUND MAJOR TASKS

TASK	LENDER / LEAD AGENCY	BORROWER / SUBGRANTEE	STATE / QEP	EPA
<b>General Requirements</b>				
<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"> <li>■ Must be an independent third-party individual and can not be the borrower's environmental contractor.</li> <li>■ May be an environmental contractor or the State.</li> </ul>	✓			
<b>Plan for Community Involvement</b>				
<i>Designates Community Relations Spokesperson</i> <ul style="list-style-type: none"> <li>■ Spokesperson must be an employee of the lead agency</li> </ul>	✓			
<i>Prepares a draft Community Relations Plan (CRP) and submits to EPA for review</i> <ul style="list-style-type: none"> <li>■ CRP must be prepared before the 'analysis of cleanup alternatives' is made available for public review and comment.</li> <li>■ 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.</li> <li>■ CRP may be prepared by either Lead Agency or Borrower/Subgrantee.</li> <li>■ Lead Agency is responsible for ensuring CRP compliance.</li> </ul>	✓	✓		
<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"> <li>■ The repository must be established before the analysis of cleanup alternatives is made available for public review and comment.</li> </ul>	✓			
<b>Analysis of Brownfields Cleanup Alternatives (ABCA)</b>				
<i>Drafts a remedial planning document that includes an analysis of cleanup alternatives(ABCA)</i> <ul style="list-style-type: none"> <li>■ Identifies the objectives of the environmental response action and provides an analysis of cleanup alternatives.</li> <li>■ Documents that the situation meets the need for an environmental response action.</li> <li>■ Provides information pertaining to site background; threats to public health and/or the environment posed by the site; enforcement activities; and projected costs.</li> <li>■ Identifies the proposed action, and explains the rational for its selection.</li> <li>■ ABCA may be included in remedial design documents (RAP).</li> </ul>		✓		
<b>Conduct Community Involvement</b>				
<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 &amp; comments on the draft ABCA document</i>			✓	✓

TASK	LENDER / LEAD AGENCY	BORROWER / SUBGRANTEE	STATE / QEP	EPA
<b>Decision Document</b>				
<i>Prepares Decision Document identifying the selected cleanup for the site</i> ■ 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.	✓			
<b>Cleanup Plan</b>				
<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> ■ This step may occur simultaneously with the submittal of the ABCA document.	✓	✓		
<i>Reviews State-required remedial design and engineering documents and provides written comments (CT &amp; MA) or approval (ME, RI, NH &amp; VT) per State VCP</i> ■ 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.			✓	
<i>Submits copy of written comments (CT &amp; MA) or State approval letter (ME, RI, NH &amp; VT) to EPA</i>	✓	✓		
<i>Submits budget of proposed cleanup to EPA that details activities to be funded with EPA funds</i>		✓		
<i>Reviews and approves budget of proposed cleanup activities</i>				✓
<b>Quality Assurance Project Plan (QAPP)</b>				
<i>Prepares quality assurance project plan if environmental sampling is to be conducted and submits to EPA for approval</i>		✓		
<i>Reviews and approves quality assurance project plan</i>				✓
<b>Loan/Subgrant Agreement</b>				
<i>Develops draft loan/subgrant agreement and submits to EPA for review</i>	✓			
<i>Reviews loan/subgrant agreement for inclusion of federal environmental and other cross-cutting requirements (such as Davis Bacon, ESA, NHPA, etc)</i>				✓
<b>Cleanup Activities</b>				
<i>Conducts periodic site visits during implementation</i> ■ Ensure compliance with approved plans ■ Ensure compliance with Davis Bacon requirements (payrolls, labor interviews, signage, etc.)	✓		✓	
<i>Prepares cleanup closeout documentation at the conclusion of the cleanup and submits to State or designated QEP for review</i> ■ Documents that cleanup is complete and is protective of human health and the environment. ■ Identifies any institutional controls used and long-term monitoring requirements.		✓		
<i>Reviews and provides written comments (CT &amp; MA) or approval of the cleanup closeout documentation (ME, RI, NH &amp; VT) per requirements of State VCP</i> ■ 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.			✓	
<i>Submits copy of closeout documentation and/or State approval letter to EPA</i> ■ 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.	✓			