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**City of Perry, Georgia  
EPA Region 4**

**BROWNFIELDS CLEANUP COOPERATIVE AGREEMENT  
WORKPLAN**

Cooperative Agreement Number:

June 6, 2023

Submitted by:  
*City of Perry, Georgia*

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The purpose of this workplan is to describe the tasks necessary to implement the project(s) identified in the City’s proposal submitted in the Fiscal Year 2023 competition for Brownfields cleanup grants. The workplan is consistent with the outline below; however, the City may modify as appropriate to fit the activities identified in its proposal. The proposed project and budget period allowable under this agreement will be between from July 1, 2023, to September 30, 2027; although, the city intends to complete the project prior to the project end date.

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## **PROJECT OVERVIEW**

Founded in 1824, Perry is the county seat of Houston County, Georgia and is home to an estimated 22,029 residents within 27 square miles (US Census, 2021). Perry earned a nickname that holds true today—the crossroads of Georgia—for the two national highways that crossed the town. The importance of Perry (City) revolved around its prime location along major transportation routes (stagecoach, railways, and, later, highways). Post-Civil War, Perry was bustling with textile mills and factories. Twentieth century industrial changes started with construction of nearby Robins Air Force Base in 1941. From 1940 to 1960, The City’s population quadrupled, fueled in part by the base. Completed in the 1960s, I-75 brought a steady stream of companies to Perry’s transportation thoroughfares such as Frito-Lay, Perdue Farms, and PPG Glass, by the 1990s. The textile industry that blossomed in the early 20<sup>th</sup> century waned from the 1970s-1990s. By the mid-1990s, significant and transformative economic changes took hold. Manufacturing plants in Perry shut their doors, victims of offshore outsourcing with vastly cheaper labor and raw material costs.

The target area for this cleanup grant is the Perry Downtown Development District, in which the target site is centrally located; The target area is considered a low-income neighborhood and a food desert with a lack of transportation options (USDA 2019). The City prioritized the target area with community input, and the target site’s assessment was completed as part of its FY18 EPA grant-funded Brownfield Assessment Project. Once the cleanup is complete, this site will be shovel ready to create a public park and recreation area that will revitalize the community, remove blight, and address a Georgia Hazardous Site Inventory property plaguing the community.

This assistance agreement supports the following EPA strategic goals and objectives: Goal 6: Safeguard and Revitalize Communities and 6.1: Clean Up and Restore Land for Productive Uses and Healthy Communities.

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 applications prepared in accordance with the FY 2023 Application Guidelines for Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Grants, and submitted in a national competition. The City of Perry (hereinafter the “Cooperative Agreement Recipient” or the “CAR”) was selected for Cleanup Grant funding in the FY 2023 competition. The EPA anticipates the project and budget period to be from July 1, 2023, through September 30, 2027.

## Project Description

The Stanley Assemblage consists of approximately 1.4-acres across six parcels comprising a water tower and vacant land formerly improved with a shopping center and dry cleaner. Environmental assessments revealed soil and groundwater impacted with chlorinated solvent compounds released from the former on-premises dry cleaner. Situated between Macon Road and Meeting Street, this assemblage is located in downtown Perry at the heavily travelled intersection of Macon Road (also US Highway 41 – highest volume roadway within the City), and GA Highway 127, just north of Main Street.



*Project area map*

The redevelopment strategy for the Stanley Assemblage (Target Site) is to create a recreational and interactive greenspace on the former shopping center portion of the property (approximately 1.4 acres). Specifically, this redevelopment will serve as an extension of the adjoining Perry Arts Center event and educational space, with greenspace to the south, which will include an outdoor classroom space with educational and interactive signs and exhibits. This greenspace may also be location of pocket retail, including food trucks and farm stands, and outdoor event space for community plays, festivals, and music concerts. End uses will be determined with community input. Lining the greenspace along Main Street and Macon Street will be pedestrian safe pathways, connecting the downtown center to the commercial corridor along Main Street and Highways 127 and 341. This redevelopment plan, which has significant public support and has been heavily influenced by community residents, intends to energize Perry's downtown that in turn will spur the local economy with smart infill development.

Given the potential to impact human health and the environment, the selected alternative is excavation, proper disposal (at a Subtitle D landfill) of 1,500 CY of impacted soil, and backfilling and compacting with clean soil. Currently, PCE impacts are primarily located in the upper 3 feet, in an area around the former dry cleaners and extending north onto the Perry Arts Center and water tower areas, with deeper impacts (0-15') at the northwest portion of the former dry cleaners. Confirmatory sampling will be conducted in accordance with state cleanup guidelines to document cleanup compliance with the vertical and horizontal extents of excavated soil. The impacted soil will be excavated; profiled as a documented waste stream; and transported off-site for proper disposal at the approved landfill. If impacts are encountered at depths greater than anticipated based on assessment results, then additional soil excavation may be required to achieve unconditional closure status. To profile for proper disposal, a toxicity characteristic leachate procedure (TCLP) VOC test will be performed on all soil, asphalt parking, and concrete building slab waste removed from the site.

The City will build on its existing community involvement activities to communicate progress and solicit input on cleanup/reuse plans. The current community involvement plans are designed to explain and communicate project activities to the whole target community and interested parties. Information will be distributed to the community through email, neighborhood meetings, and updated on the City website and social media platforms in English and Spanish. Prior to conducting cleanup activities, the City will host a community-wide forum where residents and stakeholders will have the opportunity to learn about proposed cleanup plans and provide input on cleanup decisions and reuse.

### **Project Team Structure and Responsibilities**

The City of Perry has been organized under the Council-Manager form of government, and the City Council is the legislative body of the City and is empowered by the City Charter to make City policy decisions. The City presently has seven operating departments: Administration, Community Development, Economic Development, Fire, Police, Public Works and Recreation. Each department has a director who is responsible to the City Manager.

The City has the internal capability to manage all technical and administrative aspects of the subject grant. Robert Smith, the City of Perry's Assistant City Manager, will serve as Project Director. Mr. Smith has eight years' experience in municipal government and holds a master's degree in public administration. He has successfully administered a wide array of local, state, and federal grants including CDBG, EDA, EPA and DNR grants. Mr. Smith will be assisted by Ansley Fitzner, Public Works Superintendent, who will serve as Project Coordinator. Mr. Mitchell Worthington, Director of Finance, will serve as Financial Director, ensuring compliance with all terms and conditions and financial obligations under this grant. In addition, the City will dedicate an on-staff communications officer to the project. Ms. Tabitha Clark, Communications Manager, will serve as Public Outreach Communications Manager and will be responsible for successful implementation of the City's formal CIP, program materials, newsletters, and media updates.

The City will select a QEP for this cleanup grant project through a fair and open bid process, fully consistent with federal procurement requirements 2 CFR 200 and EPA's

Rule 2 CFR 1500. We will select a QEP with experience in Brownfield Cleanup project implementation who will be responsible for selecting remediation contractors through a process in compliance with federal procurement rules. The City intends to initiate the procurement process in June 2023.

Further, the target site is currently enrolled in the Georgia Brownfields program, which will certify compliance with soil cleanup independent of dissolved groundwater impacts and offers limitation of liability from dissolved phase groundwater impacts to the current owner, the City of Perry. Therefore, no groundwater remediation is necessary under this project. The City will discuss with the State whether they want to receive copies of grant documents and how they will be notified of the site assessment activities. The City will provide the State an opportunity to review all technical reports, including Quality Assurance Project Plans (QAPPs) and Analysis of Brownfields Cleanup Alternatives (ABCA) documents, if produced under this project.

The project team will meet monthly, and the terms and conditions of the cooperative agreement will be reviewed and discussed among the project team members during these meetings to ensure that the project is on time and on budget. The cooperative agreement records, files and project budget will be maintained in the Office of the Assistant City Manager.

The Project team will meet with the EPA Project Officer quarterly, via conference call, to track the project's progress in fulfilling the scope of work, goals, and objectives and to address any issues. Each quarterly report will include an update of project expenditures and track activities and expenses against the project's schedule. Corrective action and work plan modification requests will be identified as appropriate. Specific performance metrics detailed in the Work Plan will be used to summarize project accomplishments. Additionally, site-specific information will be routinely entered and tracked in the online Assessment Cleanup and Redevelopment Exchange System (ACRES) database.

### **Measuring Environmental Results: Outputs/Outcomes**

The Project Director with support from key staff and the contracted QEP will document, track, and evaluate the following outputs and outcomes continually through quarterly progress reports, annual disadvantaged business enterprise reporting, and in quarterly calls with the EPA Project Officer. These meetings will allow the Project Director to track progress, ensure the project remains on schedule, and take corrective measures if needed. The activities and outcomes will be tracked through an Excel project management spreadsheet, invoice management system, through EPA ACRES, and documented in a final closeout report.

#### *Outputs*

Outputs for this project will include the following project deliverables: Community Involvement Plan (CIP), Brownfields program brochure, final ABCA, cleanup design, selection of remedial contractors, completion of soil excavation, quarterly reports, ACRES entries, compliance reports, and overall cleanup completion report.

#### *Outcomes*

The intended outcomes from project activities include the following: Acres of land redeveloped and community benefit from public greenspace positioned for adaptive reuse; amount of private investment and other funding leveraged; jobs created or retained; increased property and sales tax revenue generated; the creation of temporary jobs during cleanup; and improvements in environmental justice concerns (reduction of blight, access to greenspace and food stands, and removal of contaminants from environment).

Most importantly, an overall gauge of success will be acres of land redeveloped or put back into purposeful reuse. The cleanup and redevelopment of the Stanley Assemblage as a public space will serve to further improve the City of Perry’s downtown by providing a venue for all to enjoy.

**Budget**

<b>Budget Categories</b>					
(Programmatic costs only)	Task 1 Project Management	Task 2 Community Involvement	Task 3 Cleanup and Reuse Planning	Task 4 Cleanup Activities	<b>Total</b>
Personnel					
Fringe Benefits					
Travel <sup>1</sup>	\$5,000				\$5,000
Equipment <sup>2</sup>					
Supplies	\$1,000	\$4,000			\$5,000
Contractual <sup>3</sup>	\$20,000	\$20,000	\$75,000	\$40,000	\$155,000
Construction <sup>4</sup>				\$335,000	\$335,000
Other – specify					
<b>Total Budget</b>	\$26,000	\$24,000	\$75,000	\$375,000	\$500,000

**Pre-Award Costs**

The city is requesting \$17,000 in potential pre-award costs (see budget justification worksheet for cost breakdown). The City intends to begin work on the Community Involvement Plan and community meeting planning. The City also intends to host a community meeting in September. Pre-award costs would be associated with planning, promoting and hosting these meetings. The City would also initiate planning activities as the intention is to secure a QEP through procurement process described herein prior to September 2023.

## PROJECT TASK DESCRIPTIONS

### Task/Activity 1: Project Management

Project management activities funded through this cooperative agreement will include the following activities:

- Cooperative agreement oversight
- Budget management
- Scheduling and coordinating of subcontractors
- Monthly team meetings to include City staff and the contracted QEP and other City partners, as applicable
- Quarterly and annual reporting to EPA
- ACRES entries
- Final report and closeout documentation
- Annual reporting
- City staff travel to conferences, workshops for purposes of staff development and improvement of project efficiencies

*Task/Activity Lead (s):* Project Director with support from QEP and project staff

*Anticipated Project Schedule:* Pre-award through closeout in Month 24; Kick-off meeting in October 2023; monthly team meetings (Months 1-23); quarterly reports (Months 4, 7, 10, 13, 17, 21); closeout report in Month 24

Output(s): 6 quarterly reports, ACRES data entry; 23 monthly team meeting notes; Annual financial reporting forms; close-out/final quarterly report

The Project Management task will include the following activities:

**Quarterly Reporting:** In accordance with EPA regulations 2 CFR Parts 200 and 1500 (specifically, 200.329 *Monitoring and Reporting Program Performance*), the City agrees to submit quarterly progress reports to the EPA Project Officer within thirty days after each reporting period. Quarterly progress reports will be due 30 days after the end of each federal fiscal quarter, except for the last quarter of the grant project period when a final performance report must be submitted (see Final Performance Reporting below).

These reports cover work status, work progress, difficulties encountered, financial expenditures, preliminary data results, anticipated activities and any changes of key personnel. Quarterly Reports may be submitted to the Project Officer either electronically using the attached Reporting Template or by using the Quarterly Reporting function in the Assessment, Cleanup and Redevelopment Exchange System (ACRES).

**Annual Reporting:** Annual reporting activities will include the following:

1. Disadvantaged Business Enterprise Reporting: Minority Business Enterprise/Women- owned Business Enterprise (MBE/WBE or DBE) reporting will be completed by the City annually (by October 30 of each project year) using EPA



Form 5700-52A. These forms will be sent electronically to the EPA Project Officer, your Grant Specialist from the Grants Management Office (GMO), to the Region 4 MBE/WBE reporting email at [R4epagrantsmbewbereporting@epa.gov](mailto:R4epagrantsmbewbereporting@epa.gov), and to the EPA Finance Center at [rtpfc-grants@epa.gov](mailto:rtpfc-grants@epa.gov). A link to the form is at: <https://www.epa.gov/grants/epa-grantee-forms>. The City will utilize the services of DBEs, where possible.

2. Federal Financial Reports (FFRs): EPA Standard Form 425 will be submitted annually to EPA by July 30 of each project year and at the close of the grant. An electronic copy will be sent to the EPA Project Officer and to the EPA Finance Center via email at [RTPFC-Grants@epa.gov](mailto:RTPFC-Grants@epa.gov). A link to the form is at: <https://www.epa.gov/grants/epa-grantee-forms>.

**Final Performance Reporting:** In accordance with EPA regulations 2 CFR Parts 200 and 1500 (specifically, § 200.329 Monitoring and Reporting Program Performance), the City agrees to submit to the EPA Project Officer within 90 days after the expiration or termination of the approved project period a final technical report and at least one reproducible copy suitable for printing. This report will summarize the accomplishments (outcomes, outputs, and other leveraged resources) during the entire grant project period, including the last quarter.

The Final Performance Report will include the following:

- A table listing all the sites assessed during the grant, the deliverables associated with each site, activities conducted at the site, and the funds expended at each site;
- A list of any other deliverables;
- Site photographs; and
- Lessons learned.

**ACRES:** Property specific information, including the property address and cleanup completions, will be entered electronically in EPA's Assessment Cleanup Redevelopment Exchange System (ACRES) database at <https://www.epa.gov/brownfields/brownfields-grantee-reporting-using-assessment-cleanup-and-redevelopment-exchange>. ACRES will be updated for each property when the following occur:

- Completion of cleanup (only after consultation with the Project Officer),
- Funds are leveraged and/or jobs created (quantities)
- Completion of the Project Period (or Final Report), and
- As significant events occur at the site, but not later than the end of the quarter

in which the event occurred

**Contractor Procurement:** Under a separate open competitive procurement process, the City will select a QEP for this Cleanup grant project through a fair and open bid process, fully consistent with federal procurement requirements 2 CFR 200 and EPA's Rule 2 CFR 1500. Procurement of any licensed abatement contractors or subcontractor(s) will follow all state and federal fair and open competition requirements as outlined in 2 CFR Part 200 and Part 1500.

The QEP will be responsible for the following project activities:

- Providing technical assistance and performing an advisory role to support successful completion of the project
- Preparing Community Involvement Plan (CIP), Quality Assurance Plan (QAPP), Health and Safety Plan (HASP), Remedial Design; Cleanup/Reuse Plans, final Analysis of Brownfield Cleanup Alternatives (ABCA), and other technical documents
- Monitoring and evaluation of the grantee's fulfillment of all performance and ACRES reporting, record keeping, and other program requirements including compliance with all programmatic terms and conditions

The procurement process will begin in June 2023 and a qualified consultant is expected to be in place by August 2023.

**Reimbursement Request:** The City will follow EPA's preferred method of payment via the Automated Standard Application for Payments (ASAP) through the U.S. Department of Treasury. The City is enrolled in ASAP will access ASAP at [www.asap.gov](http://www.asap.gov) to request payments.

**Kick-off Meeting:** The project director will schedule a project team kickoff meeting to review the workplan and terms and conditions of the cooperative agreement. The meeting will include the following team members in the kickoff call: the contractor, the EPA Project Officer and State representative and other partners as applicable. This will be an opportunity to review roles, responsibilities, and schedule.

**Travel:** The City understands that the EPA Brownfields Program supports the use of grant funding for travel to local, state and national brownfields-related conferences. The City has identified and budgeted for educational/training opportunities to enhance its program development. Costs for necessary travel and transportation are outlined in the budget justification worksheet.

**Administrative Costs:** The City understands that recipients may use up to five percent (5%) of the budget on administrative costs. Administrative costs are direct costs, including those in the form of salaries, benefits, contractual costs, supplies, and data processing charges, incurred to comply with most provisions of the Uniform Administrative Requirements, Cost Principles, And Audit Requirements for Federal Awards contained in 2 CFR 200 and 2 CFR Subpart E.

## **TASK 2 COMMUNITY INVOLVEMENT**

Community involvement activities funded through this cooperative agreement will include the following activities:

- Completion of CIP
- Community meetings/charrettes to provide updates and to solicit input from Target Area community on cleanup process/progress and site reuse
- Preparation of Stanley Assemblage Brownfield Brochures

- Social media or web-based program updates

*Task/Activity Lead (s):* Public Outreach Communications Manager with support from the Project Director, QEP, project staff and community partners

*Anticipated Project Schedule:* Pre-award through Month 21. The CIP and project brochure will be initiated in the first month after the QEP is contracted. Planning for the first community/meetings/design charrettes will be initiated during months 0-3, with the first meeting to be schedule for September 2023 with the remaining three meetings/charrettes during Months 7-21.

Output(s): CIP; 200 copies of Stanley Assemblage Brownfield Brochure; 4 community meetings/charrettes, meeting notices

The City will develop a Community Involvement (CIP) describing processes, activities, and planned outreach materials necessary to implement the grant activities. The plan will describe your community and appropriate methods of seeking input, methods of communicating progress and education/information sharing for that particular community. The CIP will be consistent with the activities mentioned in the grant proposal and will include the following community partners.

Community Based Organization	Contact Information	Role
Faith Bible Fellowship	Willie King, Pastor & Councilmember Willie.king@perry-ga.gov	Outreach to African American Community in the Target Area, Provide Meeting Space, Steering Committee Service.
Central Georgia Technical College	Andrea Griner, VP for ED agriner@centralgatech.edu	Workforce Training Partner
Perry Main Street Advisory Board	Alicia Hartley, Downtown Manager alicia.hartley@perry-ga.gov	Promotion, marketing, and redevelopment of the targeted corridor.
Perry Downtown Development Authority		Marketing, outreach, and information dissemination to Downtown District Steering Committee Service.
Habitat for Humanity	Bill Goggins, Executive Director hocohabitat@att.net	Will commit to service on steering committee
Perry Chamber of Commerce	Maggie Schuyler, President maggie@perrygachamber.com	Moving into project area, Meeting Space & Outreach
Tabitha Clark	tabitha.clark@perry-ga.gov	Communications Manager

### TASK 3 BROWNFIELD CLEANUP AND REUSE PLANNING

Cleanup and reuse planning activities funded through this cooperative agreement will include the following activities:

- Development of the final ABCA
- Development of the QAPP and HASP
- Preparation of Compliance Status Report (CSR) for the EPD Brownfield Program review/approval
- Reuse Planning: Revisions to existing site plan to incorporate additional community feedback and to ensure community benefit

*Task/Activity Lead(s):* QEP with oversight by the City project director

*Anticipated Project Schedule:* *Cleanup Planning:* Months 1-6 (ABCA will be subject to public input); *Reuse Planning:* Months 1-23

*Output(s):* 1 Final ABCA; 1 QAPP and HASP; CSR for Brownfield Program; *Reuse Planning:* Revised site plans per environmental and community input considerations

The City in conjunction with its QEP will prepare a final ABCA, Health and Safety Plan (HASP), and Quality Assurance Project Plan (QAPP). The purpose of the ABCA is to analyze brownfield cleanup alternatives that will remediate or control contaminated media identified at the site to provide protection of human health and the environment while allowing for redevelopment to move forward.

### TASK 4 BROWNFIELD CLEANUP ACTIVITIES

This section of the workplan describes the activities needed for cleanup of the Stanley Assemblage. This section details the strategy for sequencing the work to successfully complete the cleanup within the projected project period.

*Project Implementation EPA-funded activities:*

Soil excavation, confirmatory sampling; disposal at Subtitle D landfill; soil backfill; compliance reporting.

*Anticipated Project Schedule:* Months 2-8 soil excavations, disposal, and backfilling

*Task/Activity Lead(s):* Project Director and the QEP

*Output(s):* Removal of approximately 1,500 CY of soil impacted with PCE

**Site Characterization:** Although a Phase II Environmental Site Assessment or equivalent report was completed prior to proposal submission, further limited site characterization may be necessary to finalize a draft report, refine cost estimates, meet state requirements or aid in remedy selection.

1. **Quality Assurance Project Plans (QAPPs):** The QAPP will be consistent with the EPA Region 4 QAPP Toolbox. The documents in the Toolbox can be found at:

<https://www.epa.gov/brownfields/region-4-quality-assurance-project-plan-qapp-tool-box>.

2. **Health & Safety Plans:** The City with the contracted QEP will prepare and follow an OSHA-compliant Health and Safety Plan (HASP) and place a copy in the Cooperative Agreement file and submit these to EPA and the State for the Brownfields project file. EPA approval of the HASP is not required.
3. **PCBs:** The City understands that EPA R4 Brownfields recommends, but does not require, except as required by federal, state or local regulations, the characterization activities necessary to confirm the presence or absence of polychlorinated biphenyls (PCBs) at sites. In determining the potential reuse or remedial actions necessary, the City will request an inventory of known or suspected PCB containing materials/equipment. When these known or suspected PCB containing materials/equipment meet the definition of a Recognized Environmental Condition (REC), as defined by ASTM E1527-21, the City may consider inclusion in any reuse or cleanup plans as required under 40 CFR 761 – no matter what the subject of the intended remedy. The City understands that the enforcement of PCB regulations is solely the purview of EPA and is not delegated to states.

**Implementation of Cleanup Activities:** It is anticipated that the soil removed from the designated excavation areas will be directly loaded and transported offsite for disposal. Composite waste characterization samples will be collected prior to initiating the excavation to expedite the remedial process. Non-hazardous soil will be transported to a Subtitle D landfill. The backfill will be sampled at the source prior to initiating excavation to document no environmental impacts have been added to the site. The clean fill will be added to the excavation areas and compacted to a condition similar to that encountered prior to excavation.

**Excavation, Disposal, and Backfill (Removal) of Soil:** This cleanup alternative includes the excavation, stockpiling, off-site disposal of impacted soils, and backfilling with clean soils. Additional sampling may be required to confirm that the lateral and vertical depths of impacted soil has been determined. This alternative is an effective way to eliminate risk at the site since contamination and the exposure pathways would be removed. This alternative would comply with the Georgia Brownfield Act and would reduce future risk and expenditure during redevelopment of the property. Additionally, this alternative would remove the source material contributing to the groundwater impact at the site.

Further, source soil removal combined with delineation of groundwater impacts would facilitate regulatory closure through both the Georgia Brownfield and Response and Remediation Hazardous Site Inventory programs. Removal of contaminated materials from the site is typically the most effective type of remediation, regardless of contaminant type.

Many factors affect the implementability of an excavation project. Generally, excavation is limited to materials that are unconsolidated and can be removed using backhoes, excavators, and similar equipment. Source removal of the impacted soils is proposed by

excavating vertically and horizontally based on delineation sampling. Access must be available to bench, remove, and stockpile the impacted soils. Once removed, the impacted soils will be properly disposed, and the excavation will be backfilled with clean soil. Given the limited areas and depths of impact, undeveloped nature of the site, and accessibility, soil removal would be readily implementable.

The primary cleanup objective is the protection of human health and the environment. This objective will be completed by removing the impacted soils located throughout the site. The site end use is anticipated to be a public greenspace with non-residential occupants.

**Federal Cross-Cutting Requirements:** The City will comply with Federal cross-cutting requirements. These requirements include but are not limited to OSHA Worker Health & Safety Standard 29 CFR 1910.120; National 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) the Anti-Kickback Act (40 USC § 276c) and Section 504 of the Rehabilitation Act of 1973 as implemented by Executive Orders 11914 and 11250.

**Other Applicable Federal and State Laws:** The City will comply with Davis-Bacon Wage requirements on all contracts and with all applicable federal and state laws, including the Davis-Bacon Act which requires payment of the prevailing wage rate for construction projects, including cleanup activities. The Davis-Bacon Act also requires reporting, self-monitoring by the City and other requirements. The Davis-Bacon Act applies to all construction, alteration, and repair contracts and sub-contracts awarded with EPA grant funds. Recent and applicable wage rates from the U.S. Department of Labor will be incorporated into construction, alteration, and repair solicitation and contracts as applicable.

**Greener Cleanups:** Assessing and cleaning up contaminated land protects human health and the environment and will enable the City to pursue future beneficial reuse of the assemblage. Cleaning up sites can be viewed as “green” from the perspective of the cleanup improving environmental and public health conditions. However, the City will as applicable and efficient employ greener cleanup activities to achieve cleanup objectives.

**Completion of Cleanup Activities:** Although the Georgia Brownfield Program affords a prospective purchaser liability protection for dissolved phase groundwater impacts, the site is co-enrolled in the EPD Response and Remediation Program Hazardous Site Inventory. As such, the identified dissolved phase groundwater impacts will require further assessment and reporting requirements through the Hazardous Site Inventory program. The City, in conjunction with a Qualified Environmental Professional, will document that onsite work is finished. In the event of an incomplete cleanup, the City shall ensure that the site is secure and notify the appropriate state agency and the EPA Project Officer to ensure an orderly transition should additional activities become necessary.

### 3.0 SCHEDULE

Please see Attachment 2 for a complete project schedule. The project is expected to be completed within two years from the hiring of a QEP.

		<b>Time and Actions from Notice of Selection to Project/Budget Start</b>
	<b>0 month</b>	Notice of Selection: May 2023
	<b>0-3 months</b>	-CAR completes required grant award documents and submits to EPA -EPA works with CAR to finalize draft workplan (June 2023)
	<b>3-4 months</b>	EPA executes grant award
		<b>Time and Actions from Project/Budget Start to Project/Budget End</b>
<b>Year 1</b>	<b>0 months</b>	Grant award
	<b>0-3 months</b>	-RFP for contractor procurement is finalized -ACRES Training
	<b>1-4 months</b>	-Consultant contract executed and contractor on-board -Kick-off meeting held with Contractor, EPA, State and others on the Project Team -Complete Community Involvement Plan (CIP) -Plan First Public Meeting -Host Public Meeting
	<b>4 months</b>	-Quarterly Report 1 is due 30 days after 1 <sup>st</sup> quarter ends -Reimbursement Request Submitted -ACRES Entry
	<b>4 – 8 months</b>	-Develop QAPP and submit to EPA/State for approval -Conduct Limited Site Characterization -Host Public Meeting -Submit Disadvantaged Business Enterprise (DBE) Report (due October 30 annually)
	<b>7 – 8 months</b>	-Finalize ABCA -Provide Public with Opportunity to Review ABCA
	<b>7 months</b>	-Quarterly Report 2 is due 30 days after 2 <sup>nd</sup> quarter ends -Reimbursement Request Submitted.
	<b>8-12 months</b>	-Initiate Cleanup
	<b>10 months</b>	-Quarterly Report 3 is due 30 days after 3 <sup>rd</sup> quarter ends -Reimbursement Request Submitted.
	<b>Year 2</b>	<b>13 months</b>
<b>16 months</b>		-Quarterly Report 5 is due 30 days after 5 <sup>th</sup> quarter ends -Reimbursement Request Submitted - Submit Disadvantaged Business Enterprise (DBE) Report
<b>19 months</b>		-Quarterly Report 6 is due 30 days after 6 <sup>th</sup> quarter ends -Reimbursement Request Submitted
<b>22 months</b>		-Quarterly Report 7 is due 30 days after 7 <sup>th</sup> quarter ends -Reimbursement Request Submitted -Make final draw down
	<b>24 months</b>	- Final Close Technical Report if all project documentation is complete and ready (due 90 days after the project/budget period ends) -Submit Final Disadvantaged Business Enterprise (DBE) Report -Submit Final Federal Financial Report (SF425)

- Quarterly reports are due 30 days after the end of each quarter: Jan 30, April 30, July 30 and Oct 30.
- ACRES data should be entered with each project phase and after significant work completion.
- Draw down expended funds at least quarterly or more frequently as expenditures warrant