

City of Norwood, Ohio

**U.S. Environmental Protection Agency Work Plan
For Brownfields Assessment Grants
(Hazardous Substances and Petroleum Substances)**

Project Contact:

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Project Period: October 1, 2014 – September 30, 2017

This project supports Environmental Results Goal 3: Cleaning Up Communities, advance sustainable development, and protect disproportionately impacted low-income, minority, and tribal communities, prevent releases of harmful substances and clean up and restore contaminated areas. Objective 3.1: Promote Sustainable and Livable Communities. Strategic measures: Assess and Cleanup Brownfields. Specifically, the recipient will inventory, characterize, assess, and conduct planning and community involvement activities to encourage revitalization and reuse of brownfields sites. Project Period is 3 years. Output and Outcome Information can be found on the Environmental Results Table on pages 10 and 11.

CFDA: 66.818

CERCLA Authority: 104(k)(2)

DCN: STX

Budget FY: 14

Appropriation: E4

Budget Org: 0500AG7

Object Class: 4114

Program Results Code (PRC): Hazardous Sub 301D79 (Action Code: NY);

Petroleum 301D79XBP (Action Code: OR)

I. INTRODUCTION AND PROJECT OVERVIEW

Located in southwest Ohio, the City of Norwood is a small (3.14 mi²) urban community and longtime manufacturing hub of the Cincinnati region. Since 1970, Norwood has faced unique and significant events creating unaddressed environmental concerns and leaving the municipality economically devastated. Norwood's major GM assembly plant shut down in 1986 taking 9,000 jobs, and in 1990, a BASF Chemical plant exploded, resulting in human casualties and property damage along the City's main commercial thoroughfare.

Due to its severe circumstances, Norwood has been recognized by the State of Ohio as one of only five "Situational Distressed Communities," since 2010. This designation is only issued to "a county or a municipal corporation that has experienced or is experiencing a closing or downsizing of a major employer that will adversely affect the county's or municipal corporation's economy." In the last three years, five of Norwood's largest and longest-running businesses announced closures or relocations. These closures resulted in loss of more than 2,000 jobs, including four manufacturers, and decreased City revenues by 20%, and alone created more than 35 acres of brownfields in the City. It is estimated that more than 325 acres or 16% of the City's entire land area are brownfields, and that ALL of Norwood's residents are living within ¼-mile of a known or potential brownfield.

These closures compound the poor local economic conditions and steady decline of Norwood's population. According to the U.S Census Bureau, Norwood has experienced a 36.9% population decline over 40 years. The combination of these factors have placed Norwood near financial ruin, as its current tax revenues and operating budget are at the lowest point since 2005 (Norwood Auditor's Office).

The City of Norwood intends to use U.S. EPA funds to (1) complete Phase I and II Property Assessments (PAs), remedial plans, associated planning and public outreach and (2) further the work started with prior state and federal money on eligible brownfields properties within City's jurisdiction.

II. MANAGEMENT STRUCTURE

The City of Norwood is able to manage grants and oversee assessment work with internal staff experienced in brownfields activities. The City's Economic Development Director, Gerry Stoker, will serve as project manager and will manage the administration and implementation of the grants with support from Assistant Project Manager Greg Orosz, and Assistant Law Director Joe Geers. The role and experience of this team is described below.

Mr. Gerry Stoker, Economic Development Director and Building Commissioner, City of Norwood

Role: Project Manager - Mr. Stoker will manage the grant, including completion of a Cooperative Agreement and Work Plan to the U.S. EPA; enrollment in the Automated Standard Application for Payments system; and submittal of progress reports to the U.S. EPA Project Officer, specifying assessment tasks completed, financial tracking, and proposed grant activities.

Experience: Mr. Stoker has been with Norwood since 2009, and personally managed all aspects of Norwood's Clean Ohio funded-brownfield assessment and cleanup projects. Mr. Stoker is responsible for creating the Community Reinvestment Area designation in Norwood for brownfield and LEED-certified redevelopment projects.

Mr. Greg Orosz, City Planner, City of Norwood

Role: Assistant Project Manager

Experience: Mr. Orosz was instrumental in developing the City's form-based zoning code and working with Xavier University on collaborative projects including the Housing Strategy and

Wasson Way bike trail project. Mr. Orosz will assist Mr. Stoker in preparing project progress reports and will participate in meetings with potential developers to design site plans that maximize the reuse of infrastructure and community assets.

Mr. Joe Geers, Safety Service Director, City of Norwood

Role: Financial Reporting and Compliance

Experience: Mr. Geers has been the director of Public Safety for the City of Norwood since January 2004. Mr. Geers will be responsible for fiscal management of this grant. His duties at the City will also include overseeing the Fire Department, Police Department, Dispatch, Water Department, Building Department, Senior Center, Recreation Department, and the Department of Public Works.

Advisory Groups Supporting Grant Implementation

The City of Norwood has developed lasting relationships with many partners throughout its history of implementing previous Clean Ohio Revitalization Fund (CORF) grants. These partners have expertise in various disciplines and represent various organizations, including civic, environmental, government, private businesses, etc. The City of Norwood has been successful in developing partnerships with several manufacturing entities, local developers, and owners of potential brownfield properties and will continue to seek additional stakeholders as opportunities arise. Community outreach events under the grant will strive to create additional partners and assist in the planning and implementation process as grant proceedings continue.

III. WORK SCHEDULE

Task 1: Programmatic Costs

The City understands that specific technical expertise and resources are needed to effectively perform the project, and will retain a qualified environmental consultant to assist in managing the activities funded by the Assessment Grants. The City will procure the services of the environmental consultant through a compliant competitive bid process, and will include evaluating the consultant's prior U.S. EPA Grant management experience, familiarity with the grant process and deliverables required by U.S. EPA, and their ability to assist in community outreach and education. Firms will also be evaluated on their experience with the following: Ohio EPA's Voluntary Action Program (VAP) regulations, and Ohio EPA requirements and policies; environmental due diligence; transactions of environmentally impaired property; environmental site assessments; and brownfield redevelopment and financing.

The City of Norwood has systems in place to hire the expertise necessary to implement the U.S. EPA brownfields funding. The City of Norwood will issue and advertise a Request for Qualifications (RFQ) for an environmental consultant, evaluate the Qualifications received, and select an environmental consultant to perform the work. The City of Norwood will contract directly with the environmental consultant. The City of Norwood will select one consultant to perform all of the work specified under the contractual category for this grant.

All work will be completed under the direction of an Ohio VAP Certified Professional (CP). In addition, all work will conform to the standards set forth under the Ohio VAP, unless the CP determines that an American Society of Testing and Materials (ASTM) E1527-13 Phase I or ASTM E1903-97 Phase II is appropriate. The assessment of sites with underground storage tanks (USTs) present will be conducted using the ASTM industry-accepted protocols and will comply with the regulatory standards of the State of Ohio Department of Commerce, Division of

the State Fire Marshal, Bureau of Underground Storage Tank Regulations (BUSTR). All sites selected by the City of Norwood for assessment under the petroleum grant program will be submitted to BUSTR for review and approval before proceeding with the assessment work. As part of this process, City of Norwood legal staff will assist in preparing site access agreements, reviewing potential liabilities and aiding with other required legal services pursuant to the grants.

Activities	Deliverables	Responsibility	Completed By
Prepare draft RFQ	Submit draft RFQ for USEPA review	City of Norwood	30 Days
Revise draft RFQ in accordance with USEPA comments	Provide USEPA with copy of final RFQ for approval	City of Norwood	30 Days
Advertise RFQ (Public Notice and Send to Interested Parties)	Provide USEPA with copy of published RFQ	City of Norwood	14 Days
Review and evaluate RFQs, Select Consultant	Notify USEPA about selection	City of Norwood	30 Days
Contract with Consultant	Contract Document	City of Norwood	After EPA's Cooperative Agreement Award (Mid- July)

Norwood's Project Manager will be responsible for coordinating the selection of qualified environmental consultants to perform the environmental assessments and other cooperative agreement support functions. The City of Norwood will solicit qualified consulting firms through an open, competitive public Request for Qualifications and Proposal (RFQP). The City of Norwood will select a firm to retain as the qualified environmental consultants using qualifications-based selection criteria in accordance with City of Norwood's procurement protocols and applicable federal procurement rules (40 CFR 31.36).

The City of Norwood will work with its consultant to prepare one QAPP for both the petroleum and hazardous substances grants.

Activities	Deliverables	Responsibility	Completed By
Hold pre-QAPP meeting between consultant and US EPA	Meeting Minutes	City of Norwood/ Consultant	Within two weeks of bid award
Submit Draft QAPP and prepare draft Health & Safety Plan	Draft QAPP and Health and Safety Plan forwarded to US EPA	Consultant	30 days from Pre-QAPP meeting
Submit Final QAPP and Health and Safety Plan	Final QAPP and Health and Safety Plan forwarded to US EPA	Consultant	15 days after comments received from EPA

In addition to selecting an environmental consultant to perform the work, this task also includes educational programmatic expenses regarding attendance at a U.S. EPA Brownfields Conference as well as a brownfields training program or other local conference. The programmatic costs will be described in further detail in the budget section.

Task 2: Community Outreach

The City of Norwood intends to conduct public meetings at major project milestones, including: 1) a kick-off meeting at the inception of the project; 2) the completion of Phase I activities; 3) the completion of Phase II activities; and 4) during reuse planning and the development of remedial plans to be used in Ohio VAP. Notice of these meetings will be provided in the local newspapers and on the City of Norwood website. In addition, the public will be encouraged to participate by submitting comments or questions to the City of Norwood. Comments received will be discussed openly in public meetings.

To communicate project updates and status to residents, information will be provided through the Norwood Star (the local newspaper of general circulation in the area) and the Cincinnati Enquirer; local radio stations; the City of Norwood website; posted or provided in City of Norwood and municipal buildings; and materials and presentations provided by Norwood's Brownfield Task Force members to their specific organizations. Specific stakeholders, such as residents adjacent to a targeted site, will also receive information via direct mail or phone. City of Norwood representatives will also make presentations at City of Norwood meetings to describe the assessment grant process and address the concerns of local residents and business owners.

In addition to public education and outreach tasks, this task also includes an educational component for City of Norwood staff to attend brownfields-related conferences and learn more about the latest developments in brownfields redevelopment at the state and local level.

Activities	Deliverables	Responsibility	Completed By
Meeting #1	Soliciting Comments on the workplan	City of Norwood/ Consultant	July 15 th
Meeting #2 Kick-Off Public Meeting to discuss grant	Determine date and copy of presentation	City of Norwood	Prior to City of Norwood Signing Cooperative Agreement as required.
Meeting #3	Seek public input regarding brownfield inventory	City of Norwood/ Consultant	When matrix scoring is complete
Meeting #4	Discuss site selection, assessment process, and outline expectations	City of Norwood/ Consultant	Ongoing
Meeting #5	Discuss Phase I assessment findings	City of Norwood/ Consultant	Ongoing
Meeting #6	Discuss Phase II assessment findings	City of Norwood/ Consultant	Ongoing
Meeting #7	Announce project results	City of Norwood/ Consultant	Ongoing
Enter property profile information into ACRES Program	Enter appropriate data	City of Norwood	Ongoing
Attend Ohio and National Brownfield Conferences	None	City of Norwood	As Applicable

Task 3: Site Inventory

Under this task, the City of Norwood proposes to focus inventory related efforts towards two distinct areas. Norwood's largest commercial and industrial enterprises are located along Montgomery Road (US RT 22), and the Norwood Lateral (State Route 562, a major intercity east-west highway connector) with adjacent B&O Railroad. The four Census Tracts directly encompassing these two industrial routes is known as the Montgomery Road/Norwood Lateral Target Area (MR/NL), and generally includes Norwood's most concentrated brownfields clusters. Additionally, the small-scale industries and commercial developments (e.g.: petroleum service stations, tool and die facilities, laundry and dry cleaners, machine shops, etc.) in Norwood's dense residential areas are referred to as Neighborhood Sites (NS). These sites are generally located in Norwood's two southernmost Census Tracts.

Activities	Deliverables	Responsibility	Completed By
Determine site eligibility through U.S. EPA or BUSTR	Submit Eligibility Determination Form to U.S. EPA or BUSTR	City of Norwood/ Consultant	Ongoing

Through the use of the city's existing brownfields inventory and other community outreach measures, the City of Norwood will work in cooperation with the selected consultant to identify and catalogue potential brownfields sites by developing a matrix/method and associated forms in order to prioritize the potential of each site for assessment, remediation, and redevelopment.

Task 4: Site Assessment

It is estimated that, based on the prioritization of sites and site conditions, sizes and accessibility, the Consultant will conduct up to a cumulative total of 16 Phase I Environmental Site Assessments (ESA) and 10 Phase II ESAs, respectively. Phase I ESAs will be prepared in compliance with the All Appropriate Inquiries Final Rule (70FR66070), and a minimum of ASTM E1527-13 or equivalent. Phase II ESAs will be prepared in compliance with ASTM E1903-97 or equivalent and current BUSTR standards if applicable. Prior to initiating any Phase I or II ESA, the City of Norwood will confirm site eligibility determination through written response from U.S. EPA or BUSTR.

These assessments may involve necessary activities including, but not limited to: title searches, environmental database searches, site reconnaissance, interviews, historical database searches, property appraisals, detailed surveys, and increased code enforcement activities. All assessments for the Petroleum and Hazardous Substance Grants will be conducted under the standards of the Ohio EPA's VAP using State of Ohio Certified Environmental Professionals (CP) unless ASTM E1527-13 is recommended by the CP. Ohio VAP standards meet or exceed ASTM standards and it is understood that meeting VAP requirements is necessary for future grant requests through the State of Ohio's Clean Ohio program.

All Petroleum Environmental Assessments involving underground storage tanks will be conducted using ASTM industry accepted protocol, meet or exceed the ASTM E1527-13 standard, and adhere to the regulatory standards of the State of Ohio's Department of Commerce, Division of State Fire Marshall and BUSTR.

Activities	Deliverables	Responsibility	Completed By
Send EPA Project Manager and/or BUSTR Manager Information about Properties as they are selected for Property Specific Eligibility Determination.	Completed Property Specific Eligibility Determination targeted for Phase I or II work	City of Norwood/ Consultant	Ongoing
Conduct Phase I Assessments	Completed Phase I Assessments	City of Norwood/ Consultant	Ongoing
Enter property profile information into ACRES Program	Enter appropriate data	City of Norwood	After Phase I ESA is complete
Enter property profile information into ACRES Program	Enter appropriate data	City of Norwood	After Phase II ESA is complete
Conduct Phase II Assessments	Phase II Report finalized	City of Norwood/ Consultant	Ongoing
Phase II Completed	Submit copy of completed Phase II to US EPA with quarterly reports	City of Norwood	Ongoing

Task 5: Cleanup Planning

The City of Norwood and its consultant(s) will develop up to four Remedial Action Project Plans (RAPs) and/or Risk Assessments for its Petroleum and Hazardous Substance grants. The RAPs will be submitted to Ohio EPA and U.S. EPA for approval. The RAPs and Risk Assessments may be used to help secure future cleanup funding, including U.S. EPA, Jobs Ohio or other Clean Ohio Revitalization Funds. The use of U.S. EPA and/or Ohio EPA Field Support Services for brownfields, such as magnetics, ground penetrating radar and electromagnetics, will be utilized as much as possible to minimize unnecessary expenditures. Sites selected for remedial planning will offer a high redevelopment potential combined with measurable community, health, environmental, and economic benefits.

Activities	Deliverables	Responsibility	Completed By
Conduct remedial planning for sites with completed Phase II assessments	Submit remedial plan to US EPA for review	Consultant	Ongoing
Conduct outreach according to Plan	Public outreach, prioritization of properties	City of Norwood/ Consultant	Ongoing

Task 6: Quarterly Reporting, Disadvantaged Business Enterprise (DBE) Reporting and Annual Financial Reporting to U.S. EPA

The City of Norwood will submit four (4) quarterly reports per federal fiscal year to the assigned EPA Project Officer. Quarterly Reports are due thirty (30) days after the end of the quarter. The Quarterly Reports will include a cover letter, a title information page, an update on the program processes and activities for the quarter, updates of site prioritization (if applicable), a schedule summary, and a budget summary. The City of Norwood will also submit Disadvantaged Business Enterprises (DBE) Reports and Annual Financial Reports as required.

Activities	Deliverables	Responsibility	Completed By
Prepare Quarterly Reports and enter property profile information into ACRES Program	Quarterly Report received by U.S. EPA Project Officer and completed 9130.13 form. Data entered into ACRES	City of Norwood	30 days from end of Federal Fiscal Quarter: January 30, April 30, July 30, & October 30
Annual Financial Report	One year from Cooperative Agreement start date	City of Norwood	Annually
DBE Reports	Submittal to U.S. EPA Project Officer	City of Norwood	Annually

*Reporting costs have been incorporated into costs of the previous five tasks. These costs will be addressed and completed as in-kind services by the City of Norwood.

IV. Budget

The bulk of the grant dollars will be spent on Phase I and II assessments to address hazardous substances or petroleum substances and to complete remedial planning and design. This may include legal services to prepare site access agreements, review potential liabilities, and other required legal services pursuant to the grant.

Hazardous Substances Assessment Grant Project Tasks						
Budget Categories programmatic costs only	Task 1 Programmatic Costs	Task 2 Community Outreach	Task 3 Site Inventory	Task 4 Site Assessment	Task 5 Cleanup Planning	Total Budget
Personnel						
Travel		\$250	\$250			
Supplies	\$1,000	\$750	\$500			
Contractual		\$250		\$181,500	\$15,500	
Total	\$1,000	\$1,250	\$750	\$181,500	\$15,500	\$200,000

Petroleum Assessment Grant Project Tasks						
Budget Categories programmatic costs only	Task 1 Programmatic Costs	Task 2 Community Outreach	Task 3 Site Inventory	Task 4 Site Assessment	Task 5 Cleanup Planning	Total Budget
Personnel						
Travel	\$2,500	\$250	\$250			
Supplies		\$750	\$500			
Contractual		\$250	\$1,250	\$174,500	\$19,750	
Total	\$2,500	\$1,250	\$2,000	\$174,500	\$19,750	\$200,000

Budget Detail

Task 1: Programmatic Costs

The budget includes programmatic costs of \$1,000 (hazardous substances) for materials and printing program materials associated with the grant inventory and assessment functions. The travel budget of \$2,500 (petroleum) is dedicated to attendance of one person at one U.S. EPA Brownfield Conference and one brownfields training program (\$1,250 per trip). Norwood is providing in-kind staff resources (est. \$5,000) related to documenting the brownfield site inventory/selection/assessment process and coordinating/conducting operational meetings.

Task 2: Community Outreach:

The budget includes community outreach costs of \$1,250 for each grant. These costs are based on Contractual costs of \$250 per grant for Spanish-language translation services of documents and at Public Meetings, plus \$750 per grant for City costs to prepare, print, mail, and advertise project information and documents. Travel costs of \$250 per grant are for travel to meetings and community outreach events. The City is providing in-kind staff resources (est. \$5,000) to conduct outreach meetings, update the City website with project updates and details, and undertake other activities in support of the City's outreach program.

Task 3: Site Inventory:

The budget includes site inventory development costs of \$750 for each grant, which will include \$250 per grant for travel costs associated with identifying and cataloguing sites, and \$500 per grant for costs associated with creating a matrix/method and forms to implement site prioritization. These activities will also be supported by the retained environmental consultant(s) for an estimated Contractual cost of \$1,250 (petroleum).

Task 4: Site Assessment:

The budget includes site assessment costs of \$181,500 (hazardous substances) and \$174,500 (petroleum). All are Contractual costs to pay an environmental consultant for these assessments, and are based on an average Phase I ESA cost of \$3,500 each, and average Phase II ESA cost of \$30,000 each. The costs for hazardous substances assessments are based on conducting 9 Phase I ESAs and 5 Phase II ESAs, while costs for petroleum assessments are based on conducting 7 Phase I ESAs and 5 Phase II ESAs. 75% of Assessment Grant funds are dedicated to Phase II ESAs.

Task 5: Cleanup Planning:

Depending upon the nature and complexity of the necessary remediation, Norwood intends to prepare a total of 4 Cleanup Plans – 2 for sites contaminated with hazardous substances, and 2 for sites contaminated with petroleum. Based on an average cost of \$7,750 each, the budget costs are \$15,500 (hazardous substances) and \$15,500 (petroleum), and are Contractual expenses for an environmental consultant to prepare the plans. The task may also include assessment of brownfields cleanup and redevelopment alternatives and evaluation of institutional and/or engineering controls, at a cost of \$4,250 (petroleum), and will be prepared by the environmental consultant. Sites selected for cleanup planning will offer a high redevelopment potential combined with measurable community, health, environmental, and economic benefits.

Hazardous Substances Assessment Grant Environmental Results Table					
Stated Objective/ Link to EPA Strategic Plan	Grant Funding	Work Plan Activities & Timeframe for Accomplishment (Commitments)	Results of Activities (outputs)	Results of Activities (outputs)	Established Baseline for Measurement
<p>Assessment Grant Section 104(k)</p> <p>Goal 4 Healthy Communities & Ecosystems</p> <p>Subobjective 4.2.3 Assess and Cleanup Brownfields</p>	<p>\$200,000 Hazardous Substance</p>	<p>Within grant period, City of Norwood will create an inventory of brownfields, assess up to 9 properties with suspected contamination and prepare a Remedial Action Plan for up to 2 properties by the end of the grant period (assumed to be Sept. 2017)</p>	<p>Up to 9 Phase I Assessment Reports;</p> <p>Up to 5 Phase II Assessment Reports</p> <p>Up to 2 Remedial Action Plan Reports;</p> <p>Up to 9 Property Profile Forms (updated periodically); QAPP, HASP, Site-Specific Sampling Plan(s)</p> <p>Conduct 6 public meetings</p>	<p>Up to 9 properties assessed</p> <p>Up to 2 remedial action plans developed</p> <p>Up to 3 acres assessed</p> <p>Informed community on brownfields issues</p>	<p>Up to 9 assessments completed</p> <p>Complete 1 brownfield tour with interested developers and stakeholders</p> <p>Inform community of possible health effects related to brownfields</p>

Petroleum Assessment Grant Environmental Results Table					
Stated Objective/ Link to EPA Strategic Plan	Grant Funding	Work Plan Activities & Timeframe for Accomplishment (Commitments)	Results of Activities (outputs)	Results of Activities (outputs)	Established Baseline for Measurement
<p>Assessment Grant Section 104(k)</p> <p>Goal 4 Healthy Communities & Ecosystems</p> <p>Subobjective 4.2.3 Assess and Cleanup Brownfields</p>	\$200,000 Petroleum	<p>Within grant period, City of Norwood will create an inventory of brownfields, assess up to 7 properties with suspected contamination and prepare a Remedial Action Plan for up to 2 properties by the end of the grant period (assumed to be Sept. 2017)</p>	<p>Up to 7 Phase I Assessment Reports;</p> <p>Up to 5 Phase II Assessment Reports</p> <p>Up to 2 Remedial Action Plan Reports;</p> <p>Up to 7 Property Profile Forms (updated periodically); QAPP, HASP, Site-Specific Sampling Plan(s)</p> <p>Conduct 6 public meetings</p> <p>One evaluation of institutional/ engineering controls and or redevelopment alternatives</p>	<p>Up to 7 properties assessed</p> <p>Up to 2 remedial action plans developed</p> <p>Up to 3 acres assessed</p> <p>Informed community on brownfields issues</p>	<p>Up to 7 assessments completed</p> <p>Complete 1 brownfield tour with interested developers and stakeholders</p> <p>Inform community of possible health effects related to brownfields</p>