



RHODE ISLAND  
DEPARTMENT OF ENVIRONMENTAL MANAGEMENT

235 Promenade Street, Providence, RI 02908-5767

TDD 401-222-4462

October 11, 2007

Ms. Diane Kelley  
Regional Brownfields Coordinator – Region 1  
U.S. Environmental Protection Agency (Mail Code: HIO)  
One Congress Street, Suite 1100  
Boston, MA 02114-2023

RE: FY 2008 Brownfields Assessment Grant for Petroleum

Dear Ms. Kelley:

On behalf of the Rhode Island Department of Environmental Management ("RIDEM"), enclosed is a proposal for US Environmental Protection Agency ("US EPA") FY 2008 Brownfields Assessment Grant for petroleum assessment funding for use on a *community wide* basis. RIDEM is the proud recipient of a 2007 hazardous substance assessment grant for these same Targeted Communities, and this petroleum funding will allow RIDEM to further collaborate with the seven (7) Targeted Communities in Rhode Island addressed by this proposal. This application for 2008 funding is necessary to keep the momentum moving forward on assessment and redevelopment activities, both planned and underway.

RIDEM continues to recognize the increased challenges that these municipalities face, and the importance of transforming brownfields sites in these riverfront communities into productive properties in ways that provide both immediate and long-term economic and environmental benefits for residents. Through the information presented in this application, we hope it becomes abundantly clear that the successful relationships RIDEM's brownfields program has fostered with municipalities are real, measurable and highly valued by the entire brownfields redevelopment community in Rhode Island. The funding RIDEM has been able to provide to communities across the state for brownfields assessments has helped eliminate public health concerns, create new greenspace and recreational opportunities, and provide new jobs and housing for local residents. However, there is a great unmet funding need for assessment work in numerous Rhode Island communities. This grant award will help RIDEM continue to close this unfortunate gap between "high demand" and "available resources for assessments" in seven key communities that are working diligently to revitalize one of their most limited and precious resources – clean and usable land.

The seven Rhode Island municipalities addressed by this application include three (3) in the Blackstone River corridor – Woonsocket, Pawtucket and Central Falls – and four (4) in the Pawtuxet River basin – Warwick, West Warwick, Cranston and Coventry. (Hereafter, these seven (7) communities will collectively be called the "Targeted Communities.") These rivers are the two most heavily industrialized rivers flowing into Rhode Island's most important natural resource - Narragansett Bay. Each of these communities has their own ongoing revitalization programs. Many highly recognized brownfields projects have begun or been completed in these communities, and in many cases these projects have served as catalysts for further redevelopment planning. RIDEM feels it is critical for these communities to take advantage of these "catalyst" redevelopment projects – and in order to do so, additional funding for assessment projects must be identified. Based on the response we received from the Targeted Communities, we expect to receive approximately 15 applications for hazardous substance brownfield sites, many of which may include eligible petroleum release sites. This proposal represents a crucial way in which RIDEM can ensure that the momentum of assessment

and development projects funded through our 2007 grant evolves into new projects that further benefit these communities.

Woonsocket, Pawtucket, and Central Falls are located in the historic Blackstone River Valley in northeastern Rhode Island. Having played a central role in the Industrial Revolution, these three communities are now scattered with numerous abandoned, distressed, and underutilized mill properties, many of which may contain abandoned underground petroleum storage tanks. The major issue inhibiting redevelopment and reuse of these old mill sites is the lack of a complete understanding of the various environmental problems that may exist. The future economic prosperity of these riverfront communities is contingent upon the reuse and redevelopment of brownfields sites.

Similarly, the communities of Warwick, West Warwick, Cranston and Coventry in the Pawtuxet River basin in central Rhode Island are known for their distinguished mill sites and for the numerous manufacturing establishments, past and current, erected on their banks. Strong efforts to create greenways, river access and historic trails have occurred in these communities along the Pawtuxet River in recent years. Unfortunately, the economic burden of underutilized or abandoned properties in these communities has fallen on local government and the communities which they serve. Through this grant, RIDEM hopes to continue assisting these communities in assessing properties that hold the potential to be successfully recycled and put back into use for the betterment of the communities.

RIDEM was able to make this grant application available to officials in the seven Targeted Communities, and our cooperative partners for review and comment prior to October 11, 2007. Suggested changes were incorporated and RIDEM feels this proposal adequately represents the critical assessment needs of each of these seven communities. We also received a total of twelve (12) letters of strong support from municipalities and cooperative partners (*See Appendix A*).

The following is the specific information requested in the proposal guidelines:

1. Applicant Identification: RI Dept. of Environmental Management, 235 Promenade Street, Providence, RI 02908
2. Funding Requested:
  - a) Grant Type: *Assessment*
  - b) Amount: *\$200,000*
  - c) Contamination: *Petroleum*
  - d) Scope: *Community wide*
3. Location: This petroleum assessment grant will target seven (7) communities in Rhode Island:

City/Town	Contact & Title*	Address	Phone#/Fax#
Warwick	Scott Avedisian, Mayor	3275 Post Road Warwick, RI 02886	Ph: (401) 738-2000 (x6200) Fax: (401) 738-6639
Coventry	Paul Sprague ( <i>interim</i> ) Town Manager	1670 Flat River Road Coventry, RI 02816	Ph: (401) 822-9185 Fax: (401) 822-9139
West Warwick	Wolfgang Bauer, Town Manager	1170 Main Street West Warwick, RI 02893	Ph: (401) 822-9219 Fax: (401) 822-9252
Cranston	Michael Napolitano Mayor	869 Park Avenue Cranston, Rhode Island 02910	Ph: (401) 780-3110 Fax: (401) 780-3113
Woonsocket	Susan Menard, Mayor	169 Main Street Woonsocket, RI 02895	Ph: (401) 767-9205 Fax: (401) 765-4569
Pawtucket	James Doyle, Mayor	137 Roosevelt Avenue, 2 <sup>nd</sup> Floor Pawtucket RI, 02860	Ph: (401) 728-0500 (x281) Fax: (401) 723-8620
Central Falls	Charles Moreau, Mayor	580 Broad Street Central Falls, RI 02863	Ph: (401) 727-7474 Fax: (401) 727-7476

\* Current as of September 2007.

4. Contacts:

*Project Contact:* Cynthia M. Gianfrancesco, Principal Environmental Scientist  
RIDEM, Office of Waste Management  
235 Promenade Street, Providence, RI 02908  
Ph: (401) 222-4700 (x7126) / Fax: (401) 222-3812  
[Cynthia.Gianfrancesco@dem.ri.gov](mailto:Cynthia.Gianfrancesco@dem.ri.gov)

*Chief Executive:* W. Michael Sullivan, PhD, Director  
RIDEM  
235 Promenade Street, Providence, RI 02908  
Ph: (401) 222-2771 / Fax: (401) 222-6802  
[Michael.Sullivan@dem.ri.gov](mailto:Michael.Sullivan@dem.ri.gov)

5. Date Submitted: October 11, 2007 (via US Mail)

6. Project Period: Three (3) years from date of Cooperative Agreement with EPA

7. Population:

City/Town	Population *
Woonsocket	<u>43,224</u>
Pawtucket	<u>72,958</u>
Central Falls	<u>18,928</u>
Warwick	<u>85,808</u>
Coventry	<u>33,668</u>
West Warwick	<u>29,581</u>
Cranston	<u>79,269</u>

*\* From the RI Economic Development Corporation RI Databank –2000 Census data.*

8. Other/Special Considerations:

- Cranston, West Warwick, Central Falls, Pawtucket and Woonsocket comprise 5 of the 10 State Designated Enterprise Zones (encourages workforce development in facilities located in these communities).
- Cranston, Pawtucket Woonsocket and Warwick are Community Development Block Grant (CDBG) Program Entitlement Communities.
- Recognizing its national significance, Congress established *the John H Chafee Blackstone River Valley National Heritage Corridor Commission* in 1986 to assist in protecting and celebrating the Birthplace of the American Industrial Revolution. Woonsocket, Central Falls and Pawtucket are all member communities within the Blackstone River Valley National Heritage Corridor.
- Woonsocket, Central Falls, Pawtucket, Warwick, West Warwick and Cranston are considered Environmental Justice Areas as defined in RIDEM's "Policy for Considering Environmental Justice in the Review of Investigation and Remediation of Contaminated Properties" (July 2007).

9. Cooperative Partners: The following is a list of cooperative partners who we expect to continue to be involved in the implementation of this 2008 Brownfields Assessment Grant:

<b>Organization</b>	<b>Contact</b>	<b>Phone #</b>
NeighborWorks Blackstone River Valley	Margaux Morriseau	(401) 762-0993
Grow Smart RI	Scott Wolf	(401) 273-5711
Pawtuxet River Authority and Watershed Council	Robert Nero	(401) 615-7039
John H. Chafee Blackstone River Valley National Heritage Corridor Commission	Jan Reitsma	(401) 762-0250
Northern RI Chamber of Commerce	David Carlin	(401) 334-1000 x107
RI Historic Preservation and Heritage Commission	Edward Sanderson	(401) 222-4130
Northern RI Conservation District	Gina Demarco	(401) 949-1480
RI Rivers Council	Sharon Pavignano	(401) 741-8569
Pawtucket Citizens Development Corporation	Richardson Odigan	(401) 726-1173 x116
RI Department of Health	Robert Vanderslice	(401) 222-7766
City of Warwick	Daniel Geagan	(401) 738-2000 x6295
Town of Coventry	Paul Sprague	(401) 822-9182
Town of West Warwick	Wolfgang Bauer	(401) 822-9219
City Cranston	Peter Lapolla	(401) 780-3136
City of Woonsocket	Catherine Ady	(401) 762-6400
City Pawtucket	Michael Cassidy	(401) 724-5200
City of Central Falls	Arthur Hanson	(401) 727-7480

Please contact me if you have any questions or need further information concerning this proposal. We look forward to a continued successful partnership with EPA towards the completion of this project.

Thank you.

Sincerely,

Cynthia M. Gianfrancesco  
Principal Environmental Scientist  
Rhode Island Department of Environmental Management  
Office of Waste Management

*cc: Mr. Don West, Environmental Management Support, Inc.*



## EPA Brownfields Assessment Grant FY 2008 for Petroleum

*RI Department of Environmental Management*

### THRESHOLD CRITERIA FOR ASSESSMENT OF GRANTS

- A. Applicant Eligibility: The Rhode Island Department of Environmental Management ("RIDEM") is a government entity created by the RI General Assembly and is eligible to apply for funding through EPA's Brownfields Assessment Grant Program. RIDEMs enabling statute can be found at R.I. Gen. Laws Chapter 42-17.1.
- B. Letter from State or Tribal Environmental Authority: Not required. Applicant is the Rhode Island state environmental authority. Implementation by RIDEM will ensure efficient compliance with state regulations and will facilitate interactions with other state programs to support redevelopment.
- C. Site Eligibility and Property Ownership Eligibility: This is an application for community-wide assessment funding; therefore information on site eligibility has not been included. Eligibility determinations will be made, subject to EPA review and approval, as sites are identified.

### RANKING CRITERIA FOR ASSESSMENT GRANTS

#### A. Assessment Grant Proposal Budget

RIDEM intends to utilize this grant in carrying out a total of 9 site assessment tasks, including three Phase I site assessments, three Phase II site assessments, and three cleanup planning tasks. Due to the fact that we are able to significantly leverage other funding sources, only direct contractor expenses will be paid for under this grant. All other expenses, such as oversight, travel and supplies will be paid for out of other funding sources (See Section I.1. below). Therefore, 100 percent of this grant award will be utilized directly for site assessments and cleanup planning. Utilization of these funds will help to continue the successful progress of the RIDEM Brownfields Assessment program, which has been ongoing since 1996. Communities have come to depend on the RIDEM Brownfields Assessment program to provide assessment funding and expertise which they otherwise would not be able to obtain. To date, RIDEM has completed 33 brownfields assessments with the help of federal funding, the majority of which have been redeveloped or are in the process of being redeveloped.

All site assessment activities will be carried out by an experienced, qualified environmental consulting firm that has been pre-qualified through a public bidding process which complies with the Federal procurement procedures contained in 40 CFR 31.36, and has been awarded an agreement under a State of Rhode Island Master Price Agreement (#309). These contractors have received awards for both assessment and remedial planning activities and all have at least 5 years experience operating in Rhode Island (*See Appendix B*). Cost estimates are based upon estimates which have been awarded for similar work conducted under existing Targeted Brownfields Assessment (TBA) contracts.

Budget Categories	Project Tasks			
	Task I Phase I	Task II Phase II	Task III Cleanup Planning	Total
<i>Programmatic Costs</i>				
<i>Personnel</i>	-	-	-	-
<i>Fringe Benefits</i>	-	-	-	-
<i>Travel</i>	-	-	-	-
<i>Equipment</i>	-	-	-	-
<i>Supplies</i>	-	-	-	-
<i>Contractual</i>	\$ 15,000	\$ 155,000	\$ 30,000	\$ 200,000
<i>Other</i>	-	-	-	-
<b>Total</b>	<b>\$15,000</b>	<b>\$155,000</b>	<b>\$30,000</b>	<b>\$200,000</b>

## **Task Descriptions:**

**Task I – Phase I Site Assessment:** RIDEM proposes conducting three Phase I site assessments, conducted in accordance with EPA's All Appropriate Inquiry requirements and as such will meet all ASTM E 1527-05 requirements.

**Task II – Phase II Site Assessment:** RIDEM proposes to conduct three Phase II site assessments, conducted in accordance with an EPA Region I approved Quality Assurance Project Plan and RIDEM *Rules and Regulations for the Investigation and Remediation of Hazardous Materials, as amended February 2004* and will result in a final TBA report submittal to EPA Region I.

**Task III – Cleanup Planning:** RIDEM proposes to conduct cleanup planning at three sites. Cleanup planning may include the following:

- Abutter Notification/Public Notice
- Public meeting and 30 day public notice period
- Limited remedial design investigation and report
- Remedial Action Work Plan and Remedial Planning
- Remedial Soil Management Plan
- Environmental Land Usage Restriction draft
- Post-remedial Soil Management Plan

## **B. Community Need**

### **B.1 Target Community & Demographics**

Community	Population	Per Capita Income	% of Families Below Poverty	Unemployment Rate	% Non White	Population Change (+/-) 1990- 2000	Env. Justice Community
Woonsocket	43,224	\$16,223	16.7%	4.0%	20.2%	-1.49%	Yes
Central Falls	18,928	\$10,825	25.9%	4.6%	60.0%	+7.32%	Yes
Pawtucket	72,958	\$17,008	14.9%	4.5%	30.8%	+0.43%	Yes
Cranston	79,269	\$21,978	5.6%	2.9%	3.0%	+4.22%	Yes
West Warwick	29,581	\$20,250	9.2%	3.7%	7.9%	+1.07	Yes
Warwick	85,808	\$23,410	4.2%	2.7%	5.7%	+0.45	Yes
Coventry	33,668	\$22,091	3.6%	2.6%	2.5%	+8.32	No
Statewide	1,048,319	\$21,688	8.9%	3.6%	18.1%	+4.5%	N/A

**SOURCE** 1) *Population*; and 2) *Population Change (+/-) Since 1990-2000*: From 2000 RI Census Data - RI Economic Development Corporation.

**SOURCE** 1) *Per Capita Income*; 2) *% Families Below Poverty*, 3) *Unemployment Rate*; and 4) *% Non-White*: From 2000 Census Data – RI 2000 Census, RI Statewide Planning Program, RI Department of Administration and Census 2000 Summary File 3 (SF3) Data for Each Community.

**SOURCE** *Environmental Justice Community*: Based upon definition of Environmental Justice Area as defined in RIDEM's "Policy for Considering Environmental Justice in the Review of Investigation and Remediation of Contaminated Properties" (July 2007) as found at: <http://www.dem.ri.gov/envequity/pdf/outline.pdf>

Rhode Island is ideally situated in southern New England and is a state well-known for its seaside location on the Atlantic Ocean, historic architecture and wide-ranging educational, cultural and recreational assets. Communities in and around Rhode Island's urban core have received national recognition for their remarkable physical and economic revitalization. However, many pressing challenges continue to exist for this "Smallest State in the Union" – the pressing need to develop affordable housing, sustainable growth management (e.g. reducing urban sprawl), bringing underutilized sites back to productive reuse, and preserving the state's historic and cultural resources.

The seven (7) Rhode Island communities showcased in this proposal have long and interesting histories – unique to each community, yet many similarities exist.

The communities of Woonsocket, Central Falls and Pawtucket are all ideally situated along the historic Blackstone River in Northeastern RI along the state's border with Massachusetts. Rich in economic and cultural history, all are considered part of RI's urban core and were part of the heart and soul of the American Industrial Revolution beginning in the late 1700's. America's first textile mill could have been built along practically any river on the eastern seaboard, but in 1790 the forces of capital, ingenuity, mechanical know-how and skilled labor came together at Pawtucket, Rhode Island where the Blackstone River provided the power that kicked off America's drive to industrialization. The river, the mill villages and many of the old mills are still here – part of the living landscape of Woonsocket, Central Falls and Pawtucket in the Blackstone River Valley. The legacy of this industrial past in Woonsocket, Central Falls and Pawtucket remains with us today in the form of brownfields sites scattered throughout all three communities. Not only do these communities face the incredible challenge of designing intelligent land-use policies and practices to revitalize abandoned or underutilized properties, they also must grapple with problems of poverty and lower than average per capita incomes. In these three communities, per capita income ranges from \$10,825 to \$17,008 (the state average is \$21,688) and the % of families living in poverty range from 14.9% to 25.9% (the state average is 8.9%). Unemployment rates are consistently above the state average and portions of all three communities are considered environmental justice (EJ) areas of concern. *(Specific data for each community is located in the chart above.)*

The communities of Cranston, West Warwick, Warwick and Coventry are all located along the banks of the Pawtuxet River in central Rhode Island. Abundant supplies of water power enabled these four communities to enter the Industrial Revolution and emerge as major manufacturing centers. The "Fruit of the Loom Company" was founded in Warwick at the B.B. & R. Knight Mill on the Pawtuxet River. In the early 1800s in Cranston, the Rhodes family formed the textile manufacturing firm which controlled the prosperity and swayed the destiny of Pawtuxet Village for more than half a century. West Warwick has an interesting past as a thriving mill town located almost entirely in the valley carved out by the Pawtuxet River and continues to be home to one of the world's finest soap manufacturers, Bradford Soap in West Warwick's historic Valley Queen Mill. Coventry, like many towns along the Pawtuxet River and Rhode Island's other major rivers, grew around its mills and continues to retain many of the old textile mill villages. While the western end of the town is still rural in nature, the eastern section is one of the most rapidly growing residential communities in Rhode Island. *(Specific data for each community is located in the chart above.)* The communities of Cranston, West Warwick, Warwick and Coventry face the challenge of ensuring that new development (residential, commercial and industrial) is adequately balanced with the basic needs of each community, demands for open space, and the character of their historic villages and neighborhoods. This "balance" within these communities can begin to be met by re-directing growth into already populated areas of these communities – and in many instances, this corresponds to the re-use and revitalization of brownfields sites. In addition, portions of Warwick, West Warwick and Cranston are considered environmental justice (EJ) areas of concern.

RIDEM has been conducting TBA work in many of these Targeted Communities. The success of the program is reflected in the number of qualified applications received over the past two years but diminished by RIDEM's inability to fund all the projects. With the additional funding from this grant, RIDEM will be able to initiate high-priority projects in these communities which otherwise would not be funded. We anticipate receiving at least 15 applications for sites from these Targeted Communities for our 2007 hazardous substance assessment grant, many of which may include eligible petroleum release sites.

## **B.2 Community Benefits**

The need to properly assess and begin remediation of brownfields sites in the seven communities highlighted in this proposal far outweighs the resources available to RIDEM and all seven communities through EPA grants and other state/local sources. This Brownfield Assessment Grant will help further connect RIDEM staff, and their collective expertise, with local officials in such a way that fosters cooperative relationships focused on issues of the utmost important to leaders in these communities: community development, job creation, growth of the local tax base, the

creation of new open space, greenspace and recreational opportunities, and the elimination of environmental blight. These seven Targeted Communities, which once relied on the Blackstone River and Pawtuxet River only for power and waste disposal, are working to reclaim these key resources for their scenic and recreational values.

These seven communities struggle from the same economic and environmental problems facing many of New England's older urban centers. It became even more apparent to RIDEM during our 2007 Assessment Grant Pre-Award Community Notification period that these Targeted Communities are keenly aware of the number of Brownfield sites in their towns, as is evidenced by response we received and the number of applications we anticipate receiving. We believe that the only way to have a positive impact in these communities is to continue to utilize brownfields assessment funding, and this can only be accomplished by acquiring additional funding. Additional funding in the form of this Petroleum Brownfield Assessment Grant will play a key role in allowing RIDEM to continue the work we have started in order to address the accelerated sprawl development and land consumption resulting from the presence of environmentally contaminated sites. Similar benefits for the residents of these seven riverfront communities include:

Protection of Public Health & the Environment – By investing in the restoration of brownfields, RIDEM and the communities highlighted herein can investigate and remediate strategic petroleum contaminated properties that are of key importance to municipal leaders and residents that otherwise would continue to threaten public health and safety, and the environment.

Environmental Justice – The communities of Woonsocket, Central Falls and Pawtucket along the Blackstone River corridor contain some the largest number of brownfields sites in the state and highest concentrations of low incomes and minority residents. All are state designated Enterprise Zones. Assessment grant funds play a big role in returning underutilized properties to productive use thus addressing the economic, environmental and public health concerns facing the residents of Woonsocket, Central Falls and Pawtucket.

Capitalize on Locational/Infrastructure Advantages – The seven Targeted Communities are served by an array of utility and transportation infrastructure. Assessment activities in these communities, which are already served by utility and transportation infrastructure (with the exception of far western Coventry), makes redevelopment activities less costly and minimizes the need to expand utilities into underdeveloped greenspace. Incorporating this key principle of “smart growth” into the development decisions of all seven communities will help foster the type of forward thinking and progressive leadership communities need to help revitalize brownfields.

### **B.3 Impact of Brownfields on Target Communities**

The industrial past of Rhode Island, as the home of the American Industrial Revolution, has saddled these seven communities with hundreds of historic mill complexes, all with extensive environmental concerns that impede economic development and prevent the creation of plentiful greenspace and recreational opportunities. These overall impacts can be summed up as follows:

Economic Impacts – The impact that brownfield sites have on the surrounding neighborhoods in terms of visible blight is substantial. One need only to travel the riverfront leading down the Blackstone River and Pawtuxet River in these seven communities to see the effect that disinvestment and underutilized sites have on the communities. RIDEM, in cooperation with municipal officials in the seven Targeted Communities, is committed to the redevelopment of brownfield sites and will have the opportunity through this Brownfield Assessment Grant to continue the process of assessing sites that may bring much needed housing and community-oriented businesses and services to neighborhoods in need.

Health/Safety Impacts – Abandoned and run-down structures, open foundations, other infrastructure or equipment that may be compromised due to lack of maintenance, vandalism, and deterioration all pose health and safety risks for community residents.



Environmental Impacts – Potential environmental dangers associated with century old mill complexes can be biological, physical, or chemical, and can be the result of abandoned underground tanks, site contamination, groundwater impacts, surface runoff, migration of contaminants, or wastes dumped on site. Remediating and converting these old mill buildings for productive reuse and preventing the further destruction of “greenfields” is one of the most important positive impacts this Brownfields Assessment Grant will have these seven communities.

## **C. Site Selection Process**

### **C.1 Site Selection Process &Criteria**

Site selection criteria has been and will continue to be determined based upon the RIDEM TBA application which is currently in use (*See Appendix C*). The RIDEM TBA program provides assistance to municipalities, tribes and non-profit organizations only. The TBA application requires information necessary to determine if a site is eligible to receive assistance (questions 12, 13 and 14) based on all of EPA’s eligibility requirements. The application process is a competitive process and sites are scored based upon numerous factors used to determine the extent to which a property is underutilized, assessment costs, development of a reuse plan (which includes sustainable redevelopment), financial incentives offered by the applicant, leveraging of funds for cleanup, creation of open space, and the applicants community involvement process. The State of Rhode Island requires that each municipality prepare a Comprehensive Plan and Affordable Housing Plan, which must be updated through a stakeholder process every 5 years. Sites which have been identified in the Comprehensive Plan for a target community will receive higher points. Applications with the highest scoring sites will be selected for assessment activities under this grant. Applications received by RIDEM from the Targeted Communities during the 2007 assessment grant application period will be held for further consideration and prioritized along with new applications received.

### **C.2 Previous Inventory Activities**

Town Comprehensive Plans have identified and inventoried areas they wish to prioritize for redevelopment. RIDEM will continue discussions with municipal officials to update and prioritize areas which have been identified, including those sites they have previously submitted applications for, and encourage communities to include this information in the next Comprehensive Plan update.

### **C.3 Access to Privately Held Sites**

RIDEM has an access agreement process which it has successfully been carrying out since the inception of the TBA program. This includes a three party access agreement which we provide to the applicant to be signed by the applicant, the private site owner, and RIDEM. Signature of the three party access agreement is required prior to initiating site assessment activities. RIDEM works with the applicant and the property owner to resolve any potential concerns they may have, and discusses with the property owners the benefits and risks of entering the program. In the event that the applicant is unable to obtain the necessary signatures from the private owner within a reasonable period of time, the applicant will be notified that the application is being withdrawn from consideration. Of all the TBAs that RIDEM has conducted, this has resulted in the withdrawal of only one application due to an uncooperative owner.

## **D. Sustainable Reuse of Brownfields**

### **D.1 Pollution Prevention & Reducing Resource Consumption**

Sustainable reuse of brownfields sites is an important goal of RIDEM. The RIDEM TBA and Voluntary Cleanup Programs’ goals incorporate sustainable reuse objectives through regulation and policy. The Rhode Island *Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases* require reduction of threats to human health and the environment based on future use of the property, community involvement, and prevention of future brownfields. Stormwater management on sites is regulated through the RIDEM *Regulations for the Rhode Island*

*Pollutant Discharge Elimination System.* This proposal has also targeted areas identified at Environmental Justice areas and will attempt to select sites under this grant that are within these areas.

The RIDEM TBA program encourages and supports sustainable reuse whenever possible. The RIDEM TBA application specifically addresses sustainable reuse by requesting applicants to consider or plan for sustainable reuse in the early stages of site investigation, and awards more points to sites when sustainable reuse is being proposed, particularly when sustainable reuse is incorporated into a community's Comprehensive Plan. Redevelopment options are frequently only conceptual during the assessment phase. Sustainability becomes more important in remedial phases. By requiring applicants to consider sustainable reuse during the assessment phase, we believe it will result in a higher level of sustainable reuse at more sites. We will also encourage applicants to take advantage of informational resources and training workshops available through one of our partners, Grow Smart RI, whose goal is to promote sustainable reuse.

RIDEM has historically supported various sustainable reuse projects at brownfields sites. RIDEM worked very closely through the State Voluntary Cleanup Program on the Save the Bay Center, a green building which received a 2005 Phoenix Award from EPA (*See Appendix D*). RIDEM is also working on several brownfield redevelopment projects which plan to incorporate hydroelectric generation, innovative stormwater management and open space preservation. The majority of brownfield redevelopment projects must also be approved by the RIDEM Office of Water Resources to insure proper management of stormwater. Of the 16 TBA projects RIDEM is currently conducting, 8 are entirely for open space and parks, and we intend to continue to support the establishment of open space projects such as these.

## **D.2 Promotion of Economic Benefits**

One of the primary goals of the assessment will be to continue to expand economic development opportunities within these seven Targeted Communities by encouraging private sector development (e.g. development of affordable housing) and continued public investment in recreational opportunities (e.g. river walkways and greenspace). Investing grant funds in underutilized properties in these seven communities will help identify and/or dispel a perception of contamination that may exist as a result of decades of industrial activities in these riverfront communities. Heightened knowledge about the status of brownfields in industrial areas will be an important component in these communities' ability to assess the potential strength of future redevelopment of such properties. This knowledge must be grounded in a sense of stewardship of natural/cultural resources in our state and an understanding that economic development must enhance and complement those resources, not weaken them.

Investing these grant funds in these seven Targeted Communities holds the potential to allow communities to take greater advantage of Rhode Island's Historic Preservation Investment Tax Credit Program (created in 2002). This established program, which is strongly backed by the development community, housing advocates and the state's very strong "smart growth" movement, allows owners of historic properties to earn state income tax credits equal to 30% of qualified rehabilitation expenditures. For the 277 projects already enrolled in the program, the State's expense is estimated at \$460.16 million. The State's investment has been leveraged with private financing and equity investments as well as federal historic tax credits. Each \$1.0 million of State tax credits leverages \$5.35 million in total economic output. This program has been considered an enormous success for brownfields revitalization in many RI communities, and all seven of the communities addressed in this proposal have redevelopment projects (in-progress or planned) taking advantage of this tax credit program.

RIDEM is committed to help demonstrate the impact in these communities of assessing and cleaning up brownfields by measuring accomplishments consistent with metrics adopted by the national EPA Brownfields and Land Revitalization programs, including, the quantity of land on which environmental threats have been determined, risks that have been addressed, and the number of acres made ready for reuse and revitalization.

### **D.3 Promotion of A Vibrant, Equitable, & Healthy Community**

This assessment grant will assist the State of Rhode Island and the communities of Cranston, Warwick, West Warwick and Coventry (in the Pawtuxet River basin) and Woonsocket, Central Falls and Pawtucket (in the Blackstone River corridor) to continuously promote the core principles of “smart growth” at a time when a number of these communities are facing a severe shortage of affordable housing and growing demand for creating/preserving greenspace. The past successes and ongoing efforts highlighted below promote sustainable redevelopment for the betterment of residents in these seven communities and will be greatly bolstered by this grant opportunity.

→ One of the primary goals of the Pawtuxet River Authority and Watershed Council (a cooperative partner to this grant), which includes the communities of Cranston, Warwick, West Warwick and Coventry, is to stimulate preservation, protection and ecological enhancement by acquiring open space for public use and working with state and local government as well as private agencies to promote responsible/affordable residential and industrial uses of the watershed waters of the Pawtuxet River system. The Council and the Town of West Warwick recently (August 2007) celebrated the opening of a 1.3 mile portion of the West Warwick Riverwalk (multi-use pedestrian/bikeway path in the heart of West Warwick).

→ The John H. Chafee Blackstone River Valley National Heritage Corridor (a cooperative partner to this grant) works in partnership with a variety of federal/state/local agencies, along with many non-profit and private organizations, to protect not only the sites and resources of the Blackstone Valley, but to maintain the spirit of innovation and ingenuity that makes each of the communities in the Blackstone River corridor a special place. To reach these goals, the Heritage Corridor and their partners have undertaken a variety of tasks including working with local communities on restoring “Main Streets” and protecting open space. Of great interest to the residents of Woonsocket, Central Falls and Pawtucket is the ongoing development of a new bikeway, eventually to link Worcester and Providence, along the banks of the Blackstone River.

→ *Land Use 2025: State Land Use Policies and Plan* (produced by the RI Statewide Planning Program as an element of the RI State Guide Plan) is a comprehensive plan for better utilizing existing assets, safeguarding the environment and strengthening the state’s economic competitiveness. This plan (updated April 2006) places particular emphasis on using incentives to steer future growth to those places that need and can best accommodate such sustainable growth -- our urban, town and village centers. 6 of the 7 seven communities highlighted in this proposal are included as targeted Urban Centers for sustainable growth and redevelopment in Land Use 2025: State Land Use Policies and Plan.

→ In 2006, Rhode Island voters overwhelmingly approved a \$50 million statewide bond for affordable housing production. This investment will help many communities, such as the seven targeted by this proposal, meet or exceed RI’s legally mandated affordable housing policy goal that 10% of the housing in each community in the state should be affordable to low-and-moderate income households. This grant will assist in determining the best way to target the approved bond funding in ways that link safe, clean affordable housing with the sustainable reuse of brownfields and the creation/preservation of open space.

### **E. Creation and/or Preservation of Greenspace/Open Space or Non-Profit Purpose**

The state of Rhode Island has a strong commitment to preservation of open space. Historically, open space bonds, sponsored by RIDEM, have been overwhelmingly approved by voters who realize the importance of preserving open space. Most recently, in 2004 RI voters approved a \$43 million bond for open space, farmland preservation, and recreational development to be allocated between 2005 and 2008. Through these approved bond referendums, RIDEM has been able to offer numerous opportunities for communities to apply for and obtain grant funding for the development of recreational parks and preservation of open space (*See Appendix E*).

RIDEM’s TBA program encourages applications for redevelopment of properties for open space, recreational facilities and for nonprofit purposes and awards extra points for recreational and open space projects. RIDEM recognizes the

fact that these types of revitalization projects catalyze further revitalization in surrounding communities. This proposal targets communities that fall within two major river watersheds, the Blackstone River and the Pawtuxet River. These rivers are intertwined with numerous brownfields due to the historic location of mills along their banks. These communities recognize the importance of access to these natural resources and have embraced the incorporation of greenspaces into redevelopment. Under RIDEMs current TBA program, 8 of the 16 projects initiated over the past 3 years include open space for active and passive recreation for the entire property. An additional 3 of the 16 projects are for non-profit groups who are proposing community projects (senior center, animal shelter, and affordable housing). The work done as part of the TBA program has provided these applicants with the information they need to continue planning these open space and community projects, and we intend to continue to facilitate the creation of open space under this grant.

RIDEM has proposed to partner with several nonprofit organizations, the Pawtuxet River Authority and Watershed Council and the John H. Chafee Blackstone River Valley National Heritage Corridor Commission, whose main objectives are to preserve and protect these rivers, and make them accessible to the general public. Each Rhode Island community is required by State Law to develop a Comprehensive Plan which includes development and maintenance of open space as one of its planning elements, and each of these communities has identified this element as a priority. Several communities in the target area also have zoning laws that require redevelopment projects to set aside a percentage of the property for open space. Through this grant, RIDEM hopes to facilitate the creation of additional greenways for active/passive recreational use, and increase access to natural resources.

Long term care of these properties is held with the individual municipalities or non-profit groups and frequently includes an Environmental Land Usage Restriction (institutional controls) which mandates long term care and maintenance, and annual inspection reports to RIDEM in accordance with the remedy, and is audited by RIDEM on a periodic basis. In addition, municipalities typically receive RIDEM Open Space Bond funding to assist with the development of these parks, and a stipulation of the bond funding is that long-term care and maintenance must be carried out in order to not incur repayment of the grant.

## **F. Pre-Award Community Notification**

### **F.1 Notification of Targeted Communities**

RIDEM is fully committed to developing all appropriate avenues to ensure community involvement in the execution of this grant award. Community outreach and stakeholder involvement will be essential to the success of this funding opportunity. RIDEM will aim to take advantage of the state's very small size and strong communication opportunities/resources to ensure the development of partnerships and comprehensive community involvement. RIDEM, in partnership with the seven communities highlighted in this proposal and identified cooperative partners, plans to inform and educate residents and various stakeholders of the process for expending funds in order to prioritize and assess potential brownfield properties. Comments which are received during the community notification process will be reviewed and, as appropriate, incorporated into the decision making process. RIDEM, in cooperation with the target communities, may use a combination of the following multi-media approaches for community notification:

- Direct letters and/or phone calls to key municipal officials and listed cooperative partners;
- Posting the grant application, award announcement and other project specific information on RIDEM's website. Will encourage the 7 communities highlighted in this application to do the same.
- RIDEM press release (aimed at newspapers). Approach primary RI news sources active in 7 target communities.
- Take advantage of on-going partnership with WJAR-TV/Channel 10 that features and promotes the environment and the work of RIDEM in a Sunday morning short newscast called "Earthwatch".
- Plan to attend and/or host meetings to announce award and solicit feedback from community officials.

- Investigate the possibility of creating a formal stakeholder group with community partners and officials for on-going discussion about the grant award and subsequent projects.
- Identify specific point-of-contact within RIDEM that will field questions/comments about the project.

RIDEM is sensitive to the fact that not all persons interested in and affected by this proposal have regular access to a computer and/or the internet, and as such, will make every attempt to not over-rely on web based notification efforts.

## **F.2 Appropriateness of Reaching Target Community**

RIDEM will be sensitive and accommodating to cultural/language differences that may necessitate the production of documents and notifications in multiple languages. RIDEM intends to incorporate the recommendations/work products of an on-going public RIDEM Stakeholder Process on Environmental Equity in the Cleanup & Reuse of Contaminated Properties on communication and outreach in environmental justice areas in the implementation of this grant. The product of this stakeholder group was a *Guidance Policy for Considering Environmental Justice in the Review of Investigation and Remediation of Contaminated Properties (July 2007 Draft)*. Many of the recommendations found in this policy focus on creating clear and effective processes for on-going two-way communication during brownfields assessment and redevelopment projects. RIDEM brownfields/site remediation staff have been implementing this draft policy since August 1, 2007 (See Appendix F).

RIDEM feels this is the most appropriate way to provide an open, non-threatening environment in which to discuss the redevelopment potential priorities of participating communities. RIDEM also feels the notification method described in F.1 above takes advantage of RI's small geographic size (roughly 30 by 40 miles) and ability to quickly communicate with major news outlets in the state (1 major newspaper, 3 major local news channels and local newspapers covering the project area(s) which RIDEM has established relationships with). RIDEM feels the notification method described in F.1 above takes advantage of the many relationships and partnerships we have built through the years with communities and organizations interested in land revitalization and brownfields redevelopment. In addition, RIDEM will be sensitive to disabled members of the public who want to participate in the execution of this project.

## **F.3 Length of Comment Period & Forms of Outreach to be Employed**

Consistent with the "Environmental Equity and Public Participation" amendments to Rhode Island's brownfields law (RIGL §23-19.14-5) in 2006 for sensitive re-use scenarios (daycares, schools and recreational facilities), the public comment period will be 20 days. RIGL §23-19.14-5 also requires that a public meeting shall be held in the city/town in which the site is located and public notice shall be given of the meeting at least 10 days prior. Following the meeting, the record shall be open for a period of not more than 20 days for the receipt of public comment. The results of all appropriate inquiries analysis and the public meeting, including the comment period, shall be documented in a written report submitted to RIDEM.

## **F.4 Plans for Addressing Comments Received**

RIDEM will proactively collaborate with community leaders and identified stakeholders to help ensure each has a voice in the project and that comments are being provided in a manner that is helpful to the general public, interested parties and municipal officials. As part of this comment period, all comments will be documented in writing and made available to the public. Consistent with how RIDEM currently prepares "response to comment" documents as part of the public rule making process, these comments will be posted on RIDEM's website and distributed as necessary to interested members of the public.

RIDEM will identify one point person to handle inquiries (US Mail, email or phone communication) about the project from beginning to end. The primary goal of this public comment period will be to facilitate continuing, on-going open lines of communication between RIDEM and any member of the public about the grant award or specific project. In addition,

RIDEM will attempt to identify any special needs (e.g. multiple languages) that might be needed in the notification and comment process.

## **G. Ongoing Community Involvement**

### **G.1 Plans for Involving the Affected Community in Cleanup Decisions or Reuse Planning**

As the leading state agency for environmental affairs in the State of RI, RIDEM is accustomed to and comfortable with the process of notifying and engaging the public in high-priority environment and land use decisions/projects which will have significant impacts on local neighborhoods. RIDEM plans to work through an ongoing stakeholder process and public meetings, as necessary, to discuss plans for assessment and thoughts on redevelopment. RIDEM expects that the cities and towns impacted by the project(s) will serve as partners with RIDEM in communicating/engaging the public in this process. Updated information will be disseminated (in as many medias as possible) to impacted communities in a timely manner so as to ensure the public is fully aware of the progress of the project. In the process of establishing an open dialogue, environmental justice will be a key objective to provide improved lines of communication with harder-to-reach individuals in the seven Targeted Communities. In addition, it is RIDEM's desire to match this Brownfields Assessment Grant with on-going master planning efforts in each community.

### **G.2 Explanation of Efforts and/or Plans to Develop Partnerships With Other Stakeholders**

RIDEM's long standing and well-established brownfields program has developed cooperative partnerships with numerous organizations, communities and other state entities focused on brownfields revitalization and environmental issues associated with brownfields reuse. *Many of these entities are identified in section G.4 below as cooperative partners for this Brownfields Assessment Grant.* We have focused on organizations active within the seven communities targeted by the Brownfields Assessment Grant and those with a broader statewide interest in brownfields and environmental/land use issues. Given RI's very small size (only 39 municipalities total), there is a broad-ranging group of entities which RIDEM can and will draw into this Brownfield Assessment Grant to determine the most beneficial use of this funding. In addition, partnerships with organizations like GrowSmart RI and other parties working for sustainable redevelopment are encouraged and applicants are awarded more points in the site selection process.

### **G.3 Specific Plans for Communicating Progress of Project(s) to Citizens/Targeted Community**

In close coordination with municipal officials, RIDEM's plans for communicating the progress of the specific projects (once sites have been identified) may include:

- Factsheets for notification and soliciting continued community engagement.
- Open stakeholder meetings with municipal officials, interested members of the public and project partners.
- Local media (newspaper & TV) will be updated periodically with press releases and official notices.
- Key websites (through RIDEM and municipalities) will be kept up-to-date with the latest information on the progress of the Brownfields Assessment Grant.
- A single point of contact within RIDEM to ensure continuous engagement with the public.
- Utilize RIDEM's full time Press & Communications Office to notify and engage the public.

When it is determined that there is a significant (greater than 10%) non-English speaking population within the area of a specific project, RIDEM will make plans with municipal officials to translate notices/advertisements and provide translation services.

## **G.4 Community-Based Organizations Involved in This Project**

<b>Organization</b>	<b>Description</b>	<b>Contact</b>
NeighborWorks Blackstone River Valley	Private non-profit community development corporation that focuses on rehabilitation construction of affordable housing & community development initiatives.	Margaux Morriseau (401) 762-0993
Grow Smart RI	Statewide public interest group representing a broad coalition of partners fighting sprawl & leading the charge for better-managed growth through innovative policies/programs. Brownfields is a priority issue for Grow Smart RI.	Scott Wolf (401) 273-5711
RI Department of Health	Primary statewide health agency in RI. A diverse and interactive state agency with broad-ranging public health responsibilities, including, but not limited to, environmental health.	Robert Vanderslice, PhD (401) 222-7766
Pawtuxet River Authority and Watershed Council	Watershed organization covering Cranston/Warwick/West Warwick/Coventry - specific interest in long-term land preservation efforts.	Robert Nero (401) 615-7039
John H. Chafee Blackstone River Valley National Heritage Corridor Commission	Congressionally created National Heritage Corridor as an affiliate of the National Park focused on the management of cultural/natural resources available to the Blackstone River Valley.	Jan Reitsma (401) 762-0250
Northern RI Chamber of Commerce	Multi-community chamber of commerce that covers the communities of the Blackstone River Valley with a vision of community development and prosperity.	David Carlin (401) 334-1000 x107
RI Historic Preservation & Heritage Commission	Rhode Island Historical Preservation & Heritage Commission is the state agency for historical preservation & heritage programs and a strategic partner with RIDEM on many brownfields projects.	Ted Sanderson (401) 222-4130
Northern RI Conservation District	Non-profit, quasi-public organization that functions as a facilitator for meeting the needs of the local land user in the conservation of soil, water and other related natural resources.	Gina Demarco (401) 949-1480
RI Rivers Council	An entity created by the RI General Assembly with the primary goal of river/watershed protection.	Sharon Pavignano (401) 741-8569
Pawtucket Citizens Redevelopment Corporation	Private non-profit community development corporation that focuses on rehabilitation construction of affordable housing & community development initiatives.	Richardson Ogidan (401) 726-1173 x116

## **H. Reduction of Threats to Human Health and the Environment**

### **H.1 Identifying and/or Reduce Threats to Human Health & the Environment**

The seven Targeted Communities are located along two of Rhode Island's major rivers, the Blackstone River and the Pawtuxet River, which were heavily industrialized during the American Industrial Revolution of the 1800's and 1900's. These heavily industrialized areas contain many old mill structures. Historically, petroleum contaminated soil, groundwater and surface water, and abandoned underground tanks, have been identified at these old mill structures. Due to the fact that these sites are adjacent to/upgradient from rivers, impacts to these rivers may be ongoing. These sites may not only impact river ecosystems, but residents who continue to utilize these waters as fisheries and for recreation. In addition, these areas are frequently located adjacent to residential neighborhoods which may also be impacted from the sites through direct exposure. RIDEM intends to utilize 100 percent of grant funding in an attempt to identify and eliminate these threats. RIDEM will initiate Phase I assessments at selected sites and will identify

recognized environmental concerns which may pose environmental or human health threats in or around the site. Phase II site assessments will then be conducted in an effort to determine the nature and extent of both on-site and off-site potential contamination at selected sites. RIDEM works closely with applicants at this phase to establish remedial alternatives that factor in the proposed end use. Providing this assessment information to applicants is the first step to cleanup and redevelopment of these properties, and reduction of human health and environmental threats in these neighborhoods. Upon completion of the Phase II assessments, RIDEM will continue to work closely with applicants throughout the cleanup planning phase to establish criteria and remedial activities needed to reduce exposure and threats from these sites, based upon the proposed future use of the site. Cleanup activities frequently require monitoring and long term maintenance of engineering controls and institutional controls in the form of an Environmental Land Usage Restrictions (*See Appendix G*). RIDEM has a successful history in incorporating institutional controls into remedies, requiring annual compliance reports from the property owners, and carrying out audits on an annual basis. RIDEM requirements include public notice requirements throughout the investigation and remediation process to keep the community informed of the findings and allow for public notice and comment of the proposed remedy at the site.

## **H.2 Cooperation With Local, State, or Tribal Health Agencies**

RIDEM is the primary state agency which holds jurisdiction over protection of human health and the environment in the state of Rhode Island, and as such has a great deal of expertise in this area. Due to Rhode Island's small size, there are no local or county environmental or health agencies. The Rhode Island Department of Health is frequently asked to become involved in specific projects where human health issues are complex and additional information needs to be disseminated to the general public. The two (2) agencies routinely cooperate in public outreach efforts, the creation of stakeholder groups, and the promulgation of new environmental and/or public health regulations.

All assessment and cleanup planning activities conducted under this grant will be conducted in accordance with the *State of Rhode Island, Department of Environmental Management, Office of Waste Management Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases* (Remediation Regulations) (*See Appendix H*) and other applicable regulations. The purpose of the Remediation Regulations is to create an integrated program requiring reporting, investigation and remediation of contaminated sites in order to eliminate and/or control threats to human health and the environment, both on and off of the site, in a timely and cost-effective manner. To ensure consistency and certainty in the process, cleanup objectives for soil and groundwater have been developed to manage the risks to human health and the environment, and are to be applied in a manner consistent with the current and expected future use of the contaminated property

All investigation and cleanup activities will be conducted under the oversight of the RIDEM Office of Waste Management under the RIDEM Voluntary Cleanup Program (*See flow chart in Appendix I*). Sites proceed through the TBA program in a slightly different manner than when under the Voluntary Cleanup Program due to the fact that it is actually the RIDEM who is conducting the assessment. Under the TBA program, at the completion of the Phase I assessment by RIDEM, a RIDEM Technical Assistant Contractor will prepare a Site Specific Quality Assurance Project Plan (QAPP) Addendum for EPA review and approval. In the event that the proposed future use of the site is for a school, a daycare facility or a recreational use facility, the applicant is required under the Rhode Island *Industrial Property Remediation and Reuse Act*, to hold a 20 day public comment period and hearing at the completion of the Phase I prior to the completion of the Site Specific QAPP Addendum. Upon approval of the Site Specific QAPP, RIDEM will issue a public notice informing the public of what assessment work will be conducted and when. Upon completion of the investigation, a draft TBA report will be prepared which will include the results of the investigation, and include at least three proposed remedial alternatives (including cost estimates) which will be based upon the future use of the property (i.e. residential, industrial, commercial, mixed use). RIDEM will then meet with the applicant to further discuss the proposed future use and select a preferred remedial alternative. The preferred remedial alternative will be incorporated into the final TBA report and the RIDEM will issue a Program Letter, advising the applicant that the investigation is complete and is in concurrence with the preferred remedial alternative. A second public notice will then be issued, including a fourteen (14) day public comment period, advising the public that the TBA report is complete, the nature of the proposed remedial alternative, and soliciting comments on the technical feasibility of the selected remedy. After any comments received are sufficiently



addressed, RIDEM then issues a Remedial Decision Letter advising the applicant to proceed with completion and submittal of the Remedial Action Work Plan. The RIDEM will then work with the applicant through the cleanup planning phase and complete the Remedial Action Work Plan. The Remedial Action Work Plan must detail a remedy which addresses the requirements of Section 8.00 Risk Management and Section 9.00 Remedial Action Work Plan, of the Remediation Regulations, and specifically address every contaminated media to assure that the remedial objectives are protective of human health and the environment. Upon approval of the Remedial Action Work Plan, the RIDEM issues a Remedial Approval Letter which advises the applicant to proceed with remediation at the site. Remediation and redevelopment is then under the close oversight of RIDEM's Voluntary Cleanup Program until completion, at which time a Letter of Compliance is issued.

## **I. Leveraging of Additional Resources**

### **I.1 Identification of Funds Already Committed or Will Be Committed**

RIDEM currently has the ability to utilize CERCLA Section 128 (a) Subtitle C funding through an EPA Cooperative Agreement. All personnel oversight for previous and future assessment grants will be paid for out of the 128 (a) grant and state allocated funding, allowing allocation of the full amount of the Section 104 (k) grant to be directed to contractual assessment work in its entirety. In addition, the current Section 128 (a) grant (Federal Fiscal Year 2008) has authorized an additional \$100,000 for contractual expenses to conduct TBAs. This funding is currently earmarked for existing TBA projects; however, we anticipate that through a similar cooperative agreement in Federal Fiscal Year 2009, RIDEM will have equivalent or additional funds to utilize for assessment work not met through this grant.

In addition, RIDEM has various sources of funding available from Natural Resource Damage Claim settlements which have specifically been earmarked to be used for brownfields assessments within the Woonasquatucket and Pawtuxet River watersheds, which totals \$200,000, to be spent over the next 2-3 years.

### **I.2 Demonstration of Ability to Leverage Funds**

The RIDEM is committed to working with the Targeted Communities to help ensure the success of projects initiated under this grant. We intend to work with the communities to identify funding sources available to them in order to complete these redevelopment projects. RIDEM has limited cleanup funds available to communities (limited to \$50,000 per project) through our Section 128 (a) grant. Additional funding sources available to applicants currently include EPA Cleanup Grants and Revolving Loan Funds, Rhode Island Economic Development Corporation Revolving Loan Fund, Housing and Urban Development grants, Community Development Block Grants, US Department of Agriculture, and US Economic Development Administration funding.

## **J. Programmatic Capability**

### **J.1 Demonstration of Ability to Manage This Grant & Successfully Perform All Phases of Work**

RIDEM's Office of Waste Management (OWM) has been managing EPA Brownfields cooperative agreements since the inception of the Brownfields Pilot program in 1996, including the Brownfields Showcase Community Pilot from 1998 through 2002. OWM has also been the recipient of EPA's Section 128(a), Subtitle C grant since 2003 and currently receives over \$1million annually to support our brownfields programs. OWM has also managed nearly \$1 million dollars in TBA grants since 1999. OWM FY 2007 TBA budget is currently \$100,000 , all of which has been allocated to 3 ongoing assessment projects. Each of these grants has met its grant commitments and has successfully completed all phases of work. To date, RIDEM has completed 33 brownfields assessments with the help of federal funding, the majority of which have been redeveloped or are in the process of being redeveloped. Successful projects include the Woonasquatucket River Greenway, the T.H. Baylis/Train Station at TF Green Airport, and Buttonhole Golf Course (See Appendix J).

There are currently 16 OWM employees that support the RIDEM brownfields program. The TBA and Assessment Grant Program Manager, Cynthia Gianfrancesco, has worked for RIDEM for 19 years in hazardous waste and site remediation programs. Ms. Gianfrancesco has been managing EPA funded programs since 1990, including the Superfund Pre-Remedial Program (1999 to present), the TBA program (January 2005 to present), and Assessment Grant program (June 2007 to present) all of which the majority of funding is dedicated to carrying out site assessments. Other OWM staff responsible for day to day project management activities are engineers and environmental scientists who have years of experience in site assessment activities. Compilation of the Phase I assessments, QAPPs, Phase II assessment field work and Targeted Brownfields Assessment Reports is conducted by RIDEM Technical Assistance Contractors. The Technical Assistance Contractors are qualified environmental professionals who are selected to participate in a State Master Price Agreement for site assessment and remediation activities after going through a public bid process which complies with the Federal procurement procedures contained in 40 CFR 31.36, and are selected for a period of 3 years with 3 annual renewals. These Contractors were pre-qualified for technical capability and rates have been approved (*See Appendix B*). As a cost saving measure, these Technical Assistance Contractors have been required by RIDEM to provide a Generic QAPP which has been approved by EPA, so that each project only needs a Site Specific QAPP Addendum. RIDEM staff and the RIDEM Technical Assistance Contractors will be dedicated to carrying out assessment activities under this grant.

## **J.2 History of Managing Federal Funds**

RIDEM currently manages over 70 federal grants annually. The RIDEM Office of Management Services is responsible for all accounting pertaining to federal grants. Based on information from the Office of Management Services, there have been no adverse audit findings reported. The OWM has been managing EPA Cooperative Agreement grants since 1985 with the first Superfund Pre-Remedial Multi-Site Cooperative Agreement. Since that time, OWM has managed numerous cooperative agreements, including Superfund National Priority List (\$263,000 annually), CORE (\$238,000 annually), Superfund Pre-Remedial (\$280,000 annually), Brownfields (currently \$1,000,000), and is currently managing a site specific NPL cooperative agreement of \$5,000,000 for the Rose Hill Regional Landfill Superfund Site, for which the RIDEM is the lead agency.

## **J.3 Recipients of Brownfields Cooperative Agreements – Compliance with Reporting Measures**

RIDEM is in the process of preparing the year end report for 2007 for its Brownfields Sub C grant and anticipates submitting the required semi-annual reports in a timely manner thereafter. Property Profile forms have been and will continue to be submitted through ACRES on a quarterly basis. RIDEM has consistently submitted its quarterly reports and annual financial status reports on time for the Superfund NPL, Pre-Remedial and CORE grants, and results for each of these grants has been consistently achieved.

## **J.4 Plans for Tracking & Measuring Progress – Achieving the Expected Outputs/Outcomes**

In order to determine if the work conducted under this grant is achieving the expected outputs and outcomes, RIDEM intends to continue using the Property Profile forms to track and measure progress. RIDEM recognizes the importance of meeting expected outputs and outcomes and the ability to track and measure these is a reflection of the success of the program. As such, RIDEM intends to complete Property Profile forms on a quarterly basis and track not only each element to be carried out under this grant, but future elements as a result of the work completed under this grant. Grant elements which may be tracked include the number of acres assessed and the associated deliverables, such as the number of Phase I assessments completed, the number of Phase II assessments completed, and the number of cleanup plans completed. Future elements to be tracked may include the number of acres cleaned up and put back to reuse, number of jobs created, and number of acres of greenspace created.