

**EPA REGION 10
FY22 BROWNFIELDS CLEANUP
COOPERATIVE AGREEMENT
WORK PLAN**

**For
Former Markwardt Brothers Garage**

**Date of Final REVISED: 8/22/2022
Period of Performance 10/1/2022 to 09/30/2025**



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EPA Cooperative Agreement Number: TBD

WORK PLAN FOR BROWNFIELDS CLEANUP COOPERATIVE AGREEMENT

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1. INTRODUCTION

1.1 Project Description, Goals and Objectives

Community Background

Chiloquin, population 767 (2020 Census), is located at the confluence of the Williamson and Sprague Rivers, in the Klamath Basin, 40 miles north of the Oregon-California border and 85 miles east of Medford. Chiloquin epitomizes the high desert area of Southeastern Oregon, and is the gateway to Central Oregon and Crater Lake National Park. The area is home to the Klamath, Modoc and Yahooskin people. This region is still the Treaty territory of the Klamath Tribes for hunting, fishing, gathering, cultural, and sustenance rights. Tribal members make up nearly half of our population.

Trappers from the Hudson's Bay Fur Company first arrived in 1826 with European settlers arriving soon thereafter. A century later, the town of Chiloquin was incorporated in 1926. In its hay day, Chiloquin was a booming timber and lumber town, built quickly and cheaply. In the year of its incorporation, a fire consumed the downtown area. The former Markwardt Brothers building and the adjacent Chiloquin Mercantile building (the subject site of this application), date back to the City's reconstruction after the downtown fire. With its healthy forests and associated economic opportunities, Chiloquin rebounded as a busy and thriving community with grocery stores, a bank, newspaper, hotels, movie house, lawyers, doctors, drug stores, dentists and a passenger railroad depot. Unfortunately, during the century following this period of prosperity, the community was hit hard by a series of political, economic, and natural events, including, termination of the tribes' Federal recognition, closing of the lumber mills, shuttering of the railroad depot, the Great Depression, flooding of the Sprague and Williamson rivers and a series of additional fires. In the 1960s and 1990s, the Sprague River flooded, damaging homes and businesses in the City and surrounding communities.

Most recently, in September 2020 the Two Four Two Fire burned for more than two weeks. It burned southwards towards Chiloquin destroying 8 homes and forcing the evacuation of 482 others. Even with restoration of the Tribe's Federal recognition and the Freedom of Religions Act, permanent social and economic impacts remain. Our community bank, lumber mills, newspaper, movie house, lawyers, drug stores, and dentists are all long gone and our cultural heritage struggles to heal. Our cumulative losses and unique historic challenges, have created blight from deteriorating and vacant structures and properties (including the Target Site for this application), a lack of opportunities for jobs and services, known and suspected contamination from previous industrial and commercial uses and a lack of funds to address these issues.

Target Site

The property targeted for cleanup under this grant is the former Markwardt Brothers Garage and former Chiloquin Mercantile Building (which recently collapsed). The target

site includes two tax parcels located at the northeast corner of West Chocktoot Street and North 1st Avenue in Chiloquin, Oregon (Klamath County Tax Parcels 3407-034DC-00500 and 3407-034DC-00400, census tract 9702, and EPA ACRES Number: 250930). The parcels were acquired on November 30, 2021, by the City of Chiloquin (Chiloquin/City).

The Target Site is situated at the heart of downtown Chiloquin. The former Markwardt Bros building is one of only a handful of historic buildings still standing. Sadly, unless this building can be remediated and restored, it will be demolished. An automotive service garage existed in the former Markwardt Building since 1919, though the current building was built after the 1926 fire. The former uses of this building include a gasoline service station that utilized an underground storage tank system, auto body repair shop, a warehouse, and most recently, a wood products packaging facility. The former Chiloquin Mercantile building was also located on the site, however its brick structure collapsed recently.

Previous Work

Phase I and Phase II Environmental Site Assessments were recently completed on the Target Site using funds from an Oregon Brownfield grant program. An update to the Phase I was completed using Chiloquin's FY21 EPA Community wide Assessment grant. The assessments identified a release of petroleum to the soil associated with the previous gas station, evidence of up to two abandoned underground storage tanks remaining in-ground, asbestos containing materials (ACM) and lead-based paint (LBP), two hydraulic vehicle lifts, and an oil change/vehicle service pit, all present within the historic building footprint. These hazardous materials have the potential to affect the community, with adjacent commercial buildings and single-family residences located within 200 feet. These feature/conditions must also be addressed before the building can be repurposed.

The City has secured \$58,000 in funds from Business Oregon to address ACM associated with the debris remaining from the collapsed Chiloquin Mercantile Building on the target site. The City is in the process of securing additional funds from Business Oregon to cover a gap between the original request for \$58,000 and the anticipated cost of the ACM removal associated with the debris pile.

The City's FY 21 EPA Assessment grant funded the development of a draft Analysis of Brownfield Cleanup Alternatives (ABCA) report which was appended to a FY2022 EPA Cleanup Grant for the Site. This draft ABCA was presented at a community meeting in November 2022 and was available for public review.

Project Objectives

The proposed project will provide environmental due diligence, cleanup planning, and reuse planning services necessary to position the target site for redevelopment. Through ongoing community engagement processes, and most recently in a November 4, 2021, community meeting, the community has expressed an interest in reuse of the Target Site as a year-round farmers market, banking kiosk location, community services office, and

small business incubator. The City will leverage the community engagement and planning efforts funded by its FY2021 EPA Brownfield Assessment coupled with supplemental community engagement efforts funded by this grant to refine a plan for the highest and best use for the Target Site that aligns with community priorities. The cleanup will lend to redevelopment projects that have the potential to bring jobs and community resources with the use of sustainable redevelopment practices, such as the reuse of existing infrastructure while preserving the historic nature of the downtown core.

1.2 Organizational Structure and Responsibilities

City of Chiloquin

As is the case for the City's FY21 Community-wide Assessment Grant, the cleanup grant will be managed by **Teresa Foreman**, City Recorder. Ms. Foreman will serve as financial director and will be assisted by Assistant City Recorder, **Ms. Kimberly Cowie**, who will support all programmatic and community engagement efforts. **Ms. Foreman**, is the chief financial officer for the City and is responsible for maintaining all financials records and reports and fiscal administration of all grant-funded programs.

The project will be directed by Cathy Stuhr of Creekside Consulting, LLC, who is a community resident and independent contractor to the City. The contractual amount for Ms. Stuhr will meet the micro-purchase threshold (defined at 2 CFR 200.1), as described in the EPA's [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#). **Ms. Stuhr** has 25 years of experience in community development, planning, engagement; environmental assessment and remediation; and program management. She will report directly to Ms. Foreman and handle day-to-day operations of the Brownfields program and will oversee the Qualified Environmental Professional (QEP). Should changes in staff occur, the City has processes in place to replace staff without significant project impacts.

Acquiring Additional Resources

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

The QEP will be responsible for the following project activities:

- Providing technical assistance and performing an advisory role to support successful completion of the project
- Preparing Community Involvement Plan (CIP), Quality Assurance Plan (QAPP), Health and Safety Plan (HASP), Remedial Design; Cleanup/Reuse Plans, final Analysis of Brownfield Cleanup Alternatives (ABCA), and other technical documents

- Monitoring and evaluation of the grantee’s fulfillment of all performance and ACRES reporting, record keeping, and other program requirements including compliance with all programmatic terms and conditions

Agency Relationships (USEPA and ODEQ)

The City will work in partnership with EPA Region 10. The EPA Brownfields Project Officer responsibilities will include the following tasks:

- Program monitoring and evaluation
- Reviewing and approving quality assurance project plans, sampling and analysis plans, final ABCA, Cleanup Plans, Remedial Design and Closure Reports
- Ensuring grantee compliance with Federal cross cutter requirements including the National Historic Preservation and Endangered Species Acts
- Providing technical assistance

The City has entered into the Volunteer Cleanup Program (VCP) with ODEQ (Site Inventory #6462). The City will work with ODEQ to ensure that the project's scope of work will achieve environmental compliance and meet the needs of the City and developers based upon the intended end use of the target property to be remediated using grant funds. Cost estimates for ODEQ oversight are included in our budget (see budget section of this work plan). Note the ODEQ project manager for our project has recently changed.

As referenced above, the City has also obtained additional leveraged funds from state-run Business Oregon, which provides services to grow business and communities across the state of Oregon. The EPA Cleanup grant activities described in this work plan will further these leveraged efforts through cleanup planning, design and completion.

If additional funding should become necessary, the City could seek funding from the Oregon State Brownfields Cleanup Fund, which is a state government program that offers low-interest loans and grant financing options for the cleanup of properties impacted by the existence of hazardous substances and for which cleanup is necessary.

Key Project Personnel

Personnel Name & Title	Organization	Contact Info
Blair Kinser Brownfield Project Officer	EPA	206-553-0555 Kinser.blair@epa.gov
Alyssia Leidel, Brownfields Program Project Officer	ODEQ	503-333-2556 Alyssia.leidel@deq.state.or.us
Karen Homolac, Brownfields Program Specialist	Business Oregon	971-239-9951 Karen.Homolac@oregon.gov
Teresa Foreman City Recorder/Project Financial Director	City	541-783-2717 chicityhall@gmail.com
Kimberly Cowie Asst. City Recorder/Project Coordinator	City	541-783-2717 chicityhall@gmail.com
Cathy Stuhr Project Director	City (contractor)	503-702-4974 cathystuhr@gmail.com

1.3 Project Outputs and Outcomes

Pursuant to EPA Order 5700.7, "Environmental Results under EPA Assistance Agreements," The City will track, measure and report, to the extent possible, the appropriate environmental outputs and outcomes associated with this City cleanup project.

The cleanup efforts in this grant will abate the hazardous building materials and equipment associated with the Markwardt Building by properly abandoning the UST(s) in place, abating asbestos containing material and lead based paint, and removing the hydraulic lifts and oil change pit. Following cleanup activities and cleanup documentation, the building and associated property will provide a clean slate for community-driven reuse. Expected outputs and outcomes are summarized below.

Outputs:

Outputs to be tracked and measured include the following:

- 1 Site Specific Quality Assurance Project Plan (QAPP)
- 1 Community Involvement Plan
- 1 Health and Safety Plan
- 1 Cleanup Remedial Design Plan
- 1 Analysis of Brownfield Cleanup Alternatives (ABCA) Final report
- 4 Brownfields Cleanup Specific Community Meetings including visioning for re-use
- 2 Site-specific fact sheet/brochures
- 1 UST Closure Report
- 1 Lift Removal and Oil-Change Pit Removal report
- 1 ACM and LBP Abatement Report
- 1 Final Project Closeout Report
- 10-11 Quarterly reports
- ACRES Property Profile data entries

The City and its QEP will track, measure and evaluate outputs through periodic meetings with the QEP, EPA and ODEQ. Outputs will be reported in quarterly reports and the final project report.

Outcomes:

Projected outcomes of this grant are as follows:

- Remediation of a key brownfield property
- Redevelopment of unused or underutilized lands
- Additional tax revenues including those from adjacent properties and from properties returned to the tax rolls
- Leveraged private and public investment and state grant funds
- Creation of new businesses and jobs
- Increase in the acres of public space and health benefits from removal of pollutant sources.

Outcomes will be tracked and recorded by project staff and through direct measurements tools, such as tax rolls (increases in revenue), new business licenses, etc. Ongoing public participation in our planning processes will also help us to measure and track outcomes.

The Target Site is the gateway to historic downtown and is one of the first buildings you see when you come into town. This project will save the Markwardt building from demolition and transform it from a rundown boarded up structure suggestive of poverty, blight, crime, and depression into an inviting indicator of economic vigor and community pride. Abatement of the hazardous building materials and equipment associated with the Markwardt Building will provide a clean slate for community-driven reuse. Cleanup and redevelopment of the Target Site will result in a cascade of additional redevelopment and reuse that will ensure Downtown Chiloquin will be a safe/walkable community with a thriving business district supplying the jobs and essential services.

2. PROJECT TASK DESCRIPTIONS

2.1 TASK 1 – PROJECT MANAGEMENT AND REPORTING

2.1.1 Project Management

ACTIVITY DESCRIPTION AND OBJECTIVE: Sub-task activities in this category include those necessary to manage the project in accordance with the work plan required statutes, circulars, and terms and conditions (T&Cs), including establishment and maintenance of necessary cooperative agreement records and files. The City will also work with ODEQ to streamline project management and to meet state assessment and remediation standards/requirements. The City has entered into the ODEQ voluntary cleanup program.

LEAD: The day-to-day operations will be conducted by Cathy Stuhr, as project director, with support from the QEP. Ms. Stuhr will also be supported by Ms. Kimberly Cowie, who will support all programmatic and community engagement efforts. Ms. Stuhr will oversee the QEP. Financial management activities including drawdown, invoicing, payment processing and fiscal recording keeping will be conducted by Ms. Foreman, City Recorder.

Ms. Stuhr will provide a written monthly report as well as verbal report to the City Council in person on a bi-monthly basis, as part of a public meeting. The Council will come to a consensus agreement to make decisions related to the project, and, where necessary, the council will make a motion. These items will be noted in the meeting minutes. All financial transactions are also subject to City Council approval.

MILESTONES AND DELIVERABLES: Fund account set up, records and files maintained, ongoing interaction with QEP.

TIMEFRAME: Throughout project performance period.

2.1.2 Project Reporting - Periodic

ACTIVITY DESCRIPTION AND OBJECTIVE: Sub-task activities in this category include those necessary to meet required periodic reports per Terms and Conditions of contract.

LEAD: The task will be conducted by the QEP in conjunction with project staff.

MILESTONES AND DELIVERABLES:

Quarterly Reporting: In accordance with EPA regulations 2 CFR Parts 200 and 1500 (specifically, 200.328 *monitoring and reporting program performance*), the City will submit quarterly progress reports to the EPA Project Officer within 30 days of the end of each federal fiscal quarter ending December, March, June, and September (due by January 30, April 30, July 30, and October 30). The exception will be for the last quarter of the grant project period when a final performance report will be submitted.

Annual Reporting:

1. Disadvantaged Business Enterprise Reporting: Disadvantaged Business Enterprise Reporting (Minority Business Enterprise/Women-owned Business Enterprise (MBE/WBE)) will be completed annually using EPA Form 5700-52A. These forms will be sent electronically to the EPA Project Officer and Grants Management Office (GMO) by October 30 of each project year. The City and its QEP will utilize the services of Disadvantaged Business Enterprises, where ever possible.
2. Federal Financial Reports (FFRs): EPA Standard Form 425 will be submitted annually to EPA by January 30 of each project year and at the close of the grant. An electronic copy will be sent to the EPA Project Officer and to the Research Triangle Park Finance Center (RTPFC) at rtpfc-grants@epa.gov.
3. Projections: The QEP and the City will identify the specific cleanup tasks that are expected to be completed in the upcoming year. This Projections list will be submitted with the quarterly report at the end of project years 1 and 2.

ACRES Reporting: Property specific information, including the property address and Phase I and II ESA and draft ABCA completions, have been entered electronically in EPA's Assessment Cleanup Redevelopment Exchange System (ACRES) database at: <http://www.epa.gov/acres>. The information regarding progress on cleanup tasks will be included in the quarterly report and will correlate with the information in ACRES. ACRES is a national database from which site-specific accomplishments are measured by Congress and the public. ACRES will be updated when the following occur:

- Completion of final ABCA
- Community meetings
- Final design
- Bidding Packages
- Contract award
- Initiation and completion of cleanup activities

- Final Cleanup Reports and to include the following data: Relevant Property Information, leveraged funds, acres cleaned up, number of jobs leveraged, institutional controls implemented, and property highlights upon completion.
- As significant events occur at the site, but not later than the end of the quarter in which the event occurred

TIMEFRAME: Throughout project performance period.

2.1.3 Staff Training/Travel

ACTIVITY DESCRIPTION AND OBJECTIVE: The City has designated a portion of its awarded grant funding for travel to local, state and national brownfields-related conferences in pursuit of educational and training opportunities that will enhance its program development. The City will attempt to send two representatives to the EPA National Brownfield Training Conference, and/or the EPA Western Brownfields Conference within the first 18 months of the project period.

LEAD: Project director

MILESTONES AND DELIVERABLES: One national or regional conference.

TIMEFRAME: Anticipated in 2023 or 2024

2.1.4 Contractor Procurement

ACTIVITY DESCRIPTION AND OBJECTIVE: The City will procure the services of a qualified environmental professional (QEP) experienced in executing Brownfield-related services to carry out tasks associated with this Brownfields cleanup grant in compliance with the Consultants Competitive Negotiation Act (CCNA).

Procuring consultants under the CCNA is consistent with new federal procurement requirements, 2 C.F.R. 200 and EPA's rule at 2 CFR. 1500. Further, the City affirms its responsibility to ensure that selected QEP comply with the terms of this cooperative agreement.

LEAD: City Recorder (Financial Officer)

MILESTONES AND DELIVERABLES: The City will solicit qualified QEPs through an RFQ or RFP and evaluate the responses as noted above. When the City has selected a QEP an agreement will be developed and signed by the City.

TIMEFRAME: This activity will be completed following approval of this work plan.

2.1.5 Final Performance Report

ACTIVITY DESCRIPTION AND OBJECTIVE: In accordance with EPA regulations 2 CFR Parts 200 and 1500 (specifically, 200.328 *monitoring and reporting program performance*), the City agrees to submit to the EPA Project Officer a final performance report. This report will summarize the accomplishments (outcomes, outputs, and other leveraged resources) during the entire grant project period, including the last quarter.

The Final Performance Report will include the following information:

- A table listing all the tasks completed during the grant, the deliverables associated with each task, activities conducted, and the funds expended for each task;
- A list of any other deliverables
- Site photographs
- Lessons learned

LEAD: The task will be conducted by the QEP in conjunction with project staff.

MILESTONES AND DELIVERABLES: A final technical report and at least one reproducible copy suitable for printing.

TIMEFRAME: Within 90 days after the expiration or termination of the approved project performance period.

2.2 TASK 2 – COMMUNITY ENGAGEMENT

2.2.1 Public Outreach and Involvement Plan

ACTIVITY DESCRIPTION AND OBJECTIVE: The community engagement and planning activities funded by this cleanup grant will be presented in a site-specific Community Involvement Plan (CIP) that will focus on the cleanup aspects of the project and complement the CIP prepared in the City’s assessment grant. The objective of the site-specific CIP is to ensure that community concerns are considered in the cleanup planning and execution activities and that community ideas for re-use drive the redevelopment plans for the property. Through this plan, the community will be kept informed of project progress and results and will be given opportunities to be involved in the project.

The following community groups will provide ongoing support of community engagement:

Partner Name	Point of Contact	Specific Role in the Project
Chiloquin Vision In Progress/Chiloquin Community Builders	John Rademacher, Board President haserad@centurytel.net 541-891-4839	CVIP serves the area through projects that result in a healthy social, economic, natural, and cultural environment and will support reuse and redevelopment activities that foster community prosperity, health and well-being by providing community engagement, strategic partnership and reuse planning support
Healthy Klamath/Blue Zone	Kelsey Mueller kelsey.mueller@healthyklamath.org	In support of the Healthiest State initiative, Blue Zones encourage changes that lead to healthier options by bringing residents, worksites, schools, restaurants, grocery stores, and government

Partner Name	Point of Contact	Specific Role in the Project
		together. Healthy Klamath/Blue Zone will help the city with designing and conducting a community engagement program to equitably address the community's quality of life.
South Central Oregon Economic Development	Denise Stilwell 541.884.5593 denise@scoedd.org	SCOEDD is a key conduit for regional economic development assistance and will provide professional staff to support economic redevelopment planning and site selection and prioritization. SCOEDD currently administers the USEPA Assessment Program for Lake County, and will advise and provide resources on Brownfield matters, strategic planning and economic development.
Oregon Health and Outdoors Initiatives	Barton Robison robison@willamettepartner ship.org	HOI is a key member of the Chiloquin Elementary School Green School Yard project and will advise the brownfield team on needs and outdoor recreation opportunities for all community members.
Oregon Main Street (OMS)	Sheri Stuart (503) 986-0679 sheri.stuart@oregon.gov	OMS will provide support to develop a vision for redevelopment planning and then attract the people and financial resources to bring about the desired change. OMS will provide training, technical assistance and networking opportunities
Chiloquin First	Valeree Lane 541-882-8846	This community coalition sponsored by Klamath Tribal Health & Family Services and Klamath County Public Health will work with the project to plan site reuse that will most benefit the community

LEAD: Project staff with the QEP and voluntary community organizations will conduct these activities.

MILESTONES AND DELIVERABLES:

Maintain Point of Contact. The City will designate points of contact for the project and contact information will be updated as necessary and will be provided on all written and electronic information. The community will be notified of any contact information changes.

Maintain Communication with Local Officials, Agencies and Community Residents: Project staff will attend neighborhood and civic organization meetings and provide updates on project activities, as well as answer questions from residents. Meetings with property owners will be held through community engagement activities. A project information sheet will be developed early in the project – projected Month 1.

Prepare a Community Involvement Plan: The QEP with City oversight will develop a written Community Involvement Plan (CIP), specific to the cleanup of the target site, to document and formalize the process to share information and seek public input to decision-making, cleanup alternatives, results and re-use plans . As a small rural community, our entire population is potentially affected by the cleanup activities and will benefit from the reuse opportunities it will provide. Therefore, it is important that the public be given ample opportunity to submit suggested reuse concepts through community meeting participation.

Establish and Maintain a Site-Specific Information Repository: Documents include project fact sheets, technical reports, the Community Involvement Plan (CIP), and other

documents will be kept at a central repository in the project office. Information repositories provide residents with local access to site information in forms that can be easily read and photocopied for future use.

The information repository already established at City Hall and display information at the Library will be updated to include the cleanup program and its relevant documents under this grant.

Conduct Public Meetings and Information Sessions with web-based alternatives due to COVID-19 impacts: A minimum of four public meetings/planning charrettes/information sessions will be held to communicate information and to solicit input from the community. Community comments will be captured in meeting minutes. Responses to comments, when appropriate, will be answered on a one-to-one basis or a response will be added as an addendum to the agenda at the following public engagement meeting. Input will also be addressed in the development/design of project activities.

TIMEFRAME: Outreach ongoing throughout the project. Draft CIP to be prepared pre-award and finalized in Month 2.

2.2.2 Public Notice and Comment

ACTIVITY DESCRIPTION AND OBJECTIVE: The objective of this task is to ensure the community is kept informed of project goals, methods, findings, and progress and to ensure the public has the opportunity for meaningful participation through formal public notice and comment periods.

LEAD: Project staff with the QEP will conduct these activities.

MILESTONES AND DELIVERABLES:

Under the planning components of the City's FY21 Community Wide Assessment grant, the City published a formal notice of the availability of the draft Analysis of Brownfields Cleanup Alternatives (ABCA) for the target site. The public comment period ended in November 2021. The City did not receive specific comments on the draft ABCA during the public meeting nor any comments during the review period.

Because there may be renewed interest in the cleanup project for the Target Site due to the recent award of the grant and because a significant amount of time has passed since the draft ABCA was first available for public review, the City will re-notice and hold a second opportunity for the public to review and comment on the draft ABCA for the target site. The publication of the notice will be pre-award and coincide with a planned community meeting in Chilquin to update the community on the progress of the Community-wide Assessment grant including the draft ABCA.

Under this cleanup grant, the City will also publish notice of availability of the proposed cleanup plan for a public comment period (of at least 30 days), and to summarize any

significant comments received and how they are addressed in the Final Cleanup Plan. With the assistance of the QEP, the City will also prepare and distribute a plain language “fact sheet” to the affected community as part of the public notice for the cleanup plan.

TIMEFRAME: Throughout the project. Notice of additional review/comment period for draft ABCA will be in Month 2.

2.2.3 Project Updates and Other Public Information

ACTIVITY DESCRIPTION AND OBJECTIVE: The objective of this task is to ensure that the community is kept informed of project goals, methods, and progress. We also want to ensure the public is provided opportunity for meaningful participation.

LEAD: Project staff with the QEP and voluntary community organizations will conduct these activities.

MILESTONES AND DELIVERABLES: Update and Maintain a Site Mailing List: A focused mailing list of local residents, organizations, businesses and officials will be established for the project. The site mailing list is used to ensure that those that do not have access to the Internet have a way to receive information (via the U.S. Postal Service).

Prepare and Distribute News Releases, Fact Sheets, Newsletters, Social Media Updates and Site Updates: Fact sheets, newsletters, and site updates summarizing current project information and describing upcoming activities (including public meetings) will be prepared and distributed to those on the project mailing and email lists. These documents are written in non-technical language and are typically prepared to coincide with important project milestones. The City will distribute information to residents through the Klamath Tribe, local associations, social and civic organizations, and churches as these have been successful partners in communicating information to the residents. The City will prepare and release announcements to local newspapers to provide information about events such as opportunities for public input, significant Site investigation findings, completion of major milestones, important scheduling information, and other pertinent Site-related information. Social media outlets, as appropriate, will also be employed to convey these messages.

TIMEFRAME: Project updates and communication with the public will be ongoing throughout the project.

2.3 TASK 3 – CLEANUP PLANNING

2.3.1 Analysis of Brownfields Cleanup Alternative

ACTIVITY DESCRIPTION AND OBJECTIVE: The purpose of the ABCA is to analyze brownfield cleanup alternatives that will remediate or control contaminated media identified at the Site to provide protection of human health and the environment while allowing for redevelopment to move forward. The City has entered the Voluntary Cleanup Program

(VCP) with ODEQ that provides the regulatory framework for assessment and remediation of the target site.

Under the planning components of the City's FY21 Community Wide Assessment grant, the City published a formal notice of the availability of the draft Analysis of Brownfields Cleanup Alternatives (ABCA) for the target site. The public comment period ended in November 2021. The City did not receive comments specifically on the draft ABCA during the public meeting held to discuss the project and ABCA nor any comments during the review period.

LEAD: QEP will conduct these activities in consultation with project staff

MILESTONES AND DELIVERABLES: For this cleanup grant, the City will notice and hold a second opportunity for the public to review and comment on the draft ABCA for the target site. The publication of the notice will be pre-award and coincide with a planned community meeting in Chiloquin to update the community on the progress of the Community-wide Assessment grant including the draft ABCA. A summary of comments received, responses to comments received, and preparation of the final ABCA will be conducted and completed pre-award by the QEP to be selected for this grant.

TIMEFRAME: Month 1.

2.3.2 Integrating Sustainability

ACTIVITY DESCRIPTION AND OBJECTIVE: This project will demonstrate, whenever possible, how aspects of sustainability have been considered or integrated into planning and remedial activities. As an example, sustainable sampling techniques, remedial technologies, and reuse options will be considered with respect to the target site and EPA Cleanup grant funds.

LEAD: This task will be completed by the QEP and oversight of the QEP will be carried out by project staff.

MILESTONES AND DELIVERABLES: There are many ways to reduce the environmental footprint of site work including: utilization of fuel-efficient vehicles; purchase or lease more sustainable equipment, supplies, and services; implementation of sustainable materials management practices (reduce, reuse, recycle); and consideration of other practices that directly reduce water, materials, climate, energy, or air impacts.

In addition, sustainable remediation technologies will be considered and addressed in the final ABCA. When appropriate, in-situ technologies with low energy demands will be considered and specified if justified.

TIMEFRAME: These sustainability initiatives will be reported in quarterly reporting throughout the project timeframe.

2.3.3 Quality Assurance Plan and Health and Safety Plan

ACTIVITY DESCRIPTION AND OBJECTIVE:

Quality Assurance Project Plans (QAPPs): The City in conjunction with its QEP will prepare and follow EPA Region 10 instructions to prepare a project specific QAPP. The plan will be submitted to EPA and ODEQ for the Brownfields project file. The QAPP is a formal document describing in detail the necessary quality assurance (QA), quality control (QC), and other technical activities that will be implemented to ensure that the results of the site work performed will satisfy the stated performance criteria.

Health & Safety Plans: The City in conjunction with its QEP will prepare and follow site specific OSHA-compliant Health and Safety Plans (HASP) and place a copy in the Cooperative Agreement file. The City understands that EPA approval of the HASP is not required however the plan will be submitted to EPA and ODEQ for the Brownfields project file.

LEAD: This task will be completed by the QEP and oversight of the QEP will be carried out by project staff.

MILESTONES AND DELIVERABLES:

When environmental samples are collected as part of the awarded brownfields cooperative agreement, the City shall have in place an EPA/State-approved QAPP prior to sample collection that will include the different requirements for the assessment of hazardous substances and contaminants. The QAPP will be prepared to be consistent with the EPA Region 10 quality assurance requirements. A project specific QAPP will be submitted to EPA and ODEQ for review and approval before any sampling is done. The QAPP shall address confirmation sampling to support cleanup related activities including: Petroleum impacted media and underground storage tank closure, automotive service bay lift and oil change pit closure, abatement of ACM and abatement of lead based paint.

The HASP will be prepared by the QEP and the City will require the QEP to prepare the HASP in compliance with and follow site specific OSHA-compliant Health and Safety Plans.

TIMEFRAME: The draft QAPP will be prepared in Month 2. Final QAPP and HASP will be prepared in Month 3 and prior to any field activities.

2.3.4 Final Clean Up Plan and Remedial Design

ACTIVITY DESCRIPTION AND OBJECTIVE:

After the Public Notice and comment period on the draft ABCA as described above, the City and its QEP will document any significant comments received and how they were/are being responded to in the final cleanup plan. The remedial design (RD) will then be

selected from the alternatives presented in the ABCA and prepared by the QEP with city oversight. The remedial design will present the technical specifications for cleanup remedies and technologies.

The Final Cleanup Plan will include the cleanup standards to be achieved and any institutional, land use or engineering controls that will be required as part of the cleanup. This document will be submitted to the EPA PM and the ODEQ VCP project manager for concurrence that the Cleanup Plan can be expected to meet applicable cleanup requirements.

The City, together with its QEP, will consider the use of institutional controls (ICs) in the cleanup plans, wherever appropriate/necessary to minimize the potential for human exposure to contamination or protect the integrity of a remedy, selected as a part of the ABCA. ICs may include, among others, zoning changes, use restriction and/or easements. The City has anticipated the additional timing requirements that ICs may place upon a project and will work closely with local and state officials in the approval process.

LEAD: These tasks will be completed by the QEP and oversight of the QEP will be carried out by project staff.

TIMEFRAME: The Final Cleanup Plan is projected to be completed in Month 9 and the final Remedial Design in Month 8.

2.4 TASK 4 – CLEANUP PERFORMANCE AND COMPLETION

As part of the City participation in the ODEQ oversight program the ODEQ will provide oversight of plans and reports related to the following tasks:

- Decommissioning of USTs/lifts/oil- change pit
- Soil and groundwater assessment
- Abatement and assessment of ACM and LBP

The estimated \$5,000 cost estimate for ODEQ oversight is included within Task 3 – Cleanup Activities provided in the budget section of this work plan. EPA will also provide guidance and oversight for the cleanup tasks listed above.

2.4.1 Permitting, Planning, Bidding and Design Phase Investigation

ACTIVITY DESCRIPTION AND OBJECTIVE:

Pending preparation of the final cleanup plan and remedial design, a Design Phase Investigation was recommended by the site Phase II Environmental Assessment report to guide cleanup activities specific to the potential UST anomaly identified and the potential additional heating oil UST along the buildings east interior wall as described in the Phase II Environmental Site Assessment for the Former Markwardt Brothers Garage. Following completion of the Design Phase Investigation and the completion of final planning

documents bid documents will be prepared for any subcontracted work required to complete the cleanup activities.

LEAD: These tasks will be completed by the QEP and oversight of the QEP will be carried out by project staff.

TIMEFRAME: The Design Phase Investigation is projected to be completed in Month 6 and the subcontracting bidding documents are anticipated to be completed in Month 9.

2.4.2 Cleanup Activities

ACTIVITY DESCRIPTION AND OBJECTIVE:

Pending preparation of the final ABCA, final cleanup plan and remedial design, the following cleanup activities are proposed for the Target Site:

2.4.2.1 Petroleum Impacted Media and Underground Storage Tank (UST) Closure:

The presence of UST(s) within the building will be confirmed by shallow excavation, then closed-in-place in order to preserve the structural integrity of the historic building. The closure activities will be completed in keeping with Oregon Department of Environmental Quality (ODEQ) guidance. The removal of approximately 100 SF of pavement and soil potentially impacted with petroleum products from top of the UST(s) will be required to confirm their presence, construction materials, and capacity. It is anticipated that approximately two feet of soil with likely petroleum impacts will need to be excavated from top of the UST(s), totaling approximately 7.5 cubic yards (CY). Upon confirmation and access, the USTs will be filled with an inert material, likely foam or flowable fill, to limit the potential for future releases and provide structural stability. An estimated 3,000 gallons of inert materials will be needed. The excavated area above the UST will need to be filled with approximately 7.5 CY of clean fill or gravel suitable to support typical intended uses within the building. Soil sampling will be conducted in accordance with ODEQ UST Decommissioning Guidance.

2.4.2.2 Automotive Service Bay Lifts and Oil Change Pit Closure: The relic hydraulic lifts and oil change pit will be inspected for remnant petroleum products, which if present will be removed for proper off-site disposal prior to removal. The removal will consist of excavating overburden concrete and soils around the installations, extracting the lift mechanisms, assessing soils beneath the lifts and oil change pit, then backfilling excavations. All remnant oils/fluids, concrete, soils, and scrap lifts will be directed for disposal or recycling at appropriately permitted facilities. Excavations will be backfilled with clean fill or gravel suitable to support typical intended uses within the building.

2.4.2.3 Abatement of ACM: In preparation for building renovation, the identified ACM within the building will be abated by a licensed abatement firm in accordance with the EPA Asbestos Hazardous Emergency Response Act (AHERA), ODEQ, and the Occupational Safety and Health Administration (OSHA) regulations. Identified material will be abated by licensed asbestos abatement workers, under the supervision of a licensed asbestos abatement supervisor, and under an approved asbestos abatement design plan. This

design will outline the required personal protection equipment (PPE), negative pressure enclosures, disposal methods, work zones, and decon/clean rooms. Air monitoring will be performed to verify the efficiency of containment areas and to ensure the safety of the public or work personnel not in a designated work zone. Asbestos containing waste material will be double-bagged and labelled appropriately. Asbestos containing waste will be disposed of in keeping with applicable regulations at a licensed disposal facility.

NOTE: The scope of this work plan does NOT include the removal of the asbestos containing pile of debris adjacent to the building. This work is being conducted under a separate grant and contract. It is anticipated this pile will be removed prior to the cleanup activities described in this work plan.

2.4.2.4 Abatement of LBP: Similarly, in preparation for building renovation, identified lead-based paint (LBP) will be abated by a licensed abatement firm in accordance with EPA, Oregon Health Authority, and OSHA regulations. The LBP will be scraped to the substrate and any debris will be collected utilizing a Class H wet/dry shop vacuum equipped with a High Efficiency Particulate Air (HEPA) filter. After all scrapable paint is removed, two coats of a clear lead encapsulate will be applied to stabilize any remaining LBP. The lead encapsulate will be applied using an airless sprayer. A toxicity characteristic leachate procedure (TCLP) lead test will be performed on all waste to determine the proper disposal methods.

LEAD: This task will be completed by the QEP and oversight of the QEP will be carried out by project staff.

MILESTONES AND DELIVERABLES: The milestones and deliverables for this task include the physical activities required to complete the tasks listed above.

TIMEFRAME: It is anticipated that cleanup activities will take place in Month 10 to 16.

2.4.3 Confirmation sampling

ACTIVITY DESCRIPTION AND OBJECTIVE:

The City has entered into the ODEQ Voluntary Cleanup Program (Site Inventory #6462). ODEQ will oversee the decommissioning of USTs/lifts/oil-change pit, further soil and groundwater assessment as needed, and abatement of ACM and LBP associated with the site. Cleanup standards will comply with EPA, ODEQ and local regulations as applicable. Confirmation sampling of various media (soil, groundwater, etc.) will be outlined in the final clean up and remedial design plans to confirm on site conditions following remedial actions comply with the applicable regulations.

LEAD: These activities will be completed by the QEP. Oversight of the QEP will be carried out by project staff.

MILESTONES AND DELIVERABLES:

Details specifying the type, number, location, and analysis for confirmation samples will be included in the Cleanup/Remedial action plans. Samples will be collected during field activities. Sample results will be evaluated and documented in conjunction with the draft and Final Cleanup Report. The results from these samples will be documented in the draft and Final Cleanup Report.

TIMEFRAME: Plans for collecting samples will be completed in conjunction with the Cleanup Plan listed above.

2.4.4 Final Cleanup Report

ACTIVITY DESCRIPTION AND OBJECTIVE: Following completion of cleanup and confirmation activities, the City via its QEP will prepare a final report that confirms the cleanup is complete and meets the cleanup standards identified in the Final Cleanup Plan.

LEAD: These activities will be completed by the QEP. Oversight of the QEP will be carried out by project staff.

MILESTONES AND DELIVERABLES:

Following completion of cleanup and confirmation activities, the City via its QEP will prepare a final report that confirms the cleanup is complete and meets the cleanup standards identified in the Final Cleanup Plan. If any institutional, land use or engineering controls are used they will be identified along with the rationale for their use

TIMEFRAME: The Final Cleanup Report is to be completed by end of year 2.

2.4.5 Federal Cross-Cutting Requirements

The City will comply with Federal cross-cutting requirements. These requirements include but are not limited to OSHA Worker Health & Safety Standard 29 CFR 1910.120; National Historic Preservation Act; Endangered Species Act; and Permits required by Section 404 of the Clean Water Act; Executive Order 11246, Equal Employment Opportunity, and implementing regulations at 41 CFR 60-4; Contract Work Hours and Safety Standards Act, as amended (40 USC § 327-333) the Anti-Kickback Act (40 USC § 276c) and Section 504 of the Rehabilitation Act of 1973 as implemented by Executive Orders 11914 and 11250.

3. SCHEDULE AND DELIVERABLES

DUE DATE	ITEM	Send to:			
		EPA PM	STATE	EPA GRANTS	EPA FINANCE
Pre-award	PRE-AWARD ACTIVITIES <ul style="list-style-type: none"> • None 				
Month 1	Re-notice availability of draft ABCA for public comment and new 30-day review period	X	X		
Month 1	Develop Community Involvement Plan and Prepare Final ABCA	X	X		
Month 1	Property Profile Form Updated in ACRES	X			
Month 1	Fact sheet 1 - project starting	X			
Month 2	Final Community Involvement Plan	X			
Month 2	Draft Cleanup Plan Draft QAPP	X	X		
Month 3	Community Meeting 1 – kickoff	X	X		
Month 3	Final QAPP / Health and Safety Plan	X	X		
Month 3	Endangered Species Act (ESA) & National Historic Preservation Act (NHPA) Letters	X			
Month 6	Design Phase Investigation	X	X		
Month 8	Remedial Design	X	X		
Month 9	Final Cleanup Plan	X	X		

DUE DATE	ITEM	Send to:			
		EPA PM	STATE	EPA GRANTS	EPA FINANCE
Month 9	Community Meeting 2 – upcoming work activities, project status, re use visioning				
Month 10	Begin Cleanup Activities				
Month 16	Complete Cleanup Activities				
Month 19	Draft Final Cleanup Report	x	X		
Month 20	Fact sheet 2 Cleanup Results				
Month 20	Community Meeting 3 - results				
Month 23	Final Cleanup Report	x	X		
Month 24	Community Meeting 4 – project close out and celebration				
Month 4	Quarterly Progress Report (QPR) 1	X			
Month 7	QPR 2 etc. to completion of project	X			
	DBE Report (MBE/WBE) (DBE = Disadvantaged Business Enterprises) Reports must be submitted annually by October 30th of each year.	X (copy)		X	
With Quarterly Progress Reports (QPR)	Photos and Lessons Learned	X			
As Needed	Requests for Reimbursement – see Administrative Terms and Conditions				X

DUE DATE	ITEM	Send to:			
		EPA PM	STATE	EPA GRANTS	EPA FINANCE
Month 36	Final Federal Financial Report (FFR) (SF425) & Final Drawdown Reports must be submitted annually within 90 days after end of reporting period.	X (copy)		X (copy)	X
Month 36	Closeout: Final Project Report with Summary Fact Sheet, Photos, and Lessons Learned	X			
Dates are subject to change pending final Cleanup Work Plan. Conditions encountered in the field and the availability of contractors may also impact schedule projections.					

4. BUDGET

4.1 Budget Table(s)

See attached Table. The City has received a cost share waiver of the 20% cost share. The attached budget table and following narratives have been adjusted to reflect the cost share waiver.

Note Personnel, Fringe Benefits, Equipment, Other, and Indirect Costs not shown as amounts are zero.

FINAL Chiloquin Cleanup Project Budget Table

Budget Category	Task 1 Project Management & Reporting		Task 2 Community Engagement		Task 3 Cleanup Planning		Task 4 Cleanup Performance & Completion		Budget Category Total
	Federal	Cost Share	Federal	Cost Share	Federal	Cost Share	Federal	Cost Share	
Personnel	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	E
Fringe Benefits	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Travel	\$2,300	0	\$0	\$0	\$0	\$0	\$0	\$0	\$2,300
Equipment	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Supplies	\$500	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$500
Contractual	\$16,000	\$0	\$15,000	\$0	\$62,500	\$0	\$305,000	\$0	\$398,500
Construction	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Other	\$1,200	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$1,200
Total Direct Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Indirect Costs	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0	\$0
Task Totals	\$20,000	\$0	\$15,000	\$0	\$62,500	\$0	\$305,000	\$0	\$402,500

Total Federal Costs: \$402,500

Total Cost Share: \$80,500 (Cost share waiver submitted with original application was approved by the EPA Office of Brownfields and Land Revitalization)

Total: \$402,500

4.2 Budget Narrative

The City will conduct the following tasks to achieve project outputs.

Task 1 –Project Management and Reporting \$20,000:

Travel: \$2,300 for two City staff members to attend one National Brownfields Conference in 2023 during the grant period (2 staff @ 1 event @ \$1,500 each. Per event cost breakdown: flight \$400; ground transport/parking \$100; 3 hotel nights at \$150/night = \$450; and 4 days per diem at \$50 = \$200).

Supplies: \$500 includes \$500 for printing materials

Contractual: \$16,000: \$1,500 for kickoff meeting (12 hours @ \$125 for meeting attendees and prep time); \$7,500 for 5 quarterly reports, including ACRES entries and annual forms as-needed (5 @ \$1,500 / 60 hours @ \$125); Davis Bacon and Historic Preservation Division reporting at \$2,000 (16 hours @ \$125); monthly meetings for project team updates at \$3,000 (6 meetings @ \$500 each); and a closeout report for \$2,000.

Other: \$1,200: registration \$350 @ for two participants at conference and \$500 for mailing and other expenses associated distribution of public notices.

Task 2 –Community Engagement \$15,000:

Contractual: \$15,000: A CIP is planned at \$2,500 (set fee); Creation of a brownfields brochure specific to the cleanup and reuse activities at the former Markwardt Brothers Garage for \$2,500; Four community meetings/design charrettes at \$10,000 total (4 @ \$2,500 each) for making the community aware of ongoing cleanup activities and provide opportunities for valuable input into reuse planning activities.

Task 3 – Cleanup Planning \$62,500:

Contractual

Cleanup Planning - \$29,500 - Final ABCA \$4,000 (32 hrs @ \$125); QAPP and H&S Plan will be created by the Qualified Environmental Professional for \$8,000 (64 hrs @ \$125); UST, Hydraulic Lift, and Oil Change Pit Closure Design \$9,500 (76 hrs @ \$125); and ACM and LBP Abatement Design at \$8,000 (64 hrs @ \$125).

Reuse Planning- \$33,000 - Updated site plans, including engineering considerations, will be produced for an estimated cost of \$33,000 (264 hrs @ \$125).

Task 4 – Cleanup Performance and Completion \$305,000:

Contractual

Permitting, Planning, Bidding and Design Phase Investigation - \$65,000 – In preparation of field work, the following will need to be completed: permitting, subcontractor bidding and

coordination, and design phase investigation (240 hrs @ \$125 = \$30,000 plus \$35,000 for sample/lab, drilling sub, survey crew, and investigative waste disposal).

Petroleum Impacted Media; UST, Lift, and Oil Change Pit Abatement - \$80,000 -

Excavation, transport, disposal and backfilling approximately two feet of impacted soil & concrete located on top of the USTs/lifts/oil-change pit, totaling approximately 10 CY @ \$1,000 / CY = \$10,000. USTs filled with an inert material, likely foam, approximately 3,000 gallons @ \$10/gallon = \$30,000. UST closure sampling \$6,000 (\$1,000 sample/lab cost & 40 hours @ \$125). In-ground hydraulic lift removal and sampling \$15,000 (\$5,500 per lift (2) removal and backfill; \$500 = sample/lab cost, & 28 hours @ \$125). Oil change pit abandonment and sampling \$19,000 (\$15,000 pit removal and backfill, \$500 = sample/lab cost, & 28 hours @ \$125)

Asbestos Containing Material (ACM) Abatement - \$67,000 – Abatement mobilization & prep \$6,250 - ACM will be properly abated by a licensed abatement firm. The following materials need to be abated: Interior plaster skim coat 3600 SF @ \$15 = \$54,000; interior wallboard joint compound 800 SF @ \$7.50 = \$6,000; window caulk 30 LF @ \$25 = \$750.

Lead-Based Paint (LBP) Paint Abatement - \$48,000 – LBP will be abated by a licensed abatement firm. The following materials need to be abated: 3,600 SF of exterior cement block paint @ \$10.00 = \$36,000; 1,200 SF of interior wood-paneling paint @ \$10.00 = \$12,000.

Project Oversight & Compliance Reporting - \$45,000 – Engineering oversight & air monitoring will be needed during ACM & LBP abatement for 20 days @ \$1,500/day = \$30,000. An UST Closure report will be completed for \$5,000. A Lift Removal and Oil-Change Pit Abandonment Report will be completed for \$5,000. Abatement Closeout Report will be completed for the ACM & LBP materials for \$5,000. It is estimated the ODEQ oversight costs will be \$5,000. These costs are imbedded in and distributed across the reports listed in this sub task.