

# CLEANUP WORKPLAN

## City of Caribou Maine Workplan for CERCLA Section 104(k) Cleanup Cooperative Agreement Period of Performance: 7/1/2023 - 9/30/2026

### 1. GOAL 1: Core Mission

#### Objective 1.3 Revitalize Land and Prevent Contamination

##### CFDA: 66.818 Multipurpose, Assessment, Cleanup, and Revolving Loan Fund Grants

**OBJECTIVE:** The Small Business Liability Relief and Brownfields Revitalization Act (SBLRBRA) was signed into law on January 11, 2002. The Act amends the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by adding Section 104(k). Section 104(k) authorizes the U.S. Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct planning related to, remediate, or capitalize revolving loan funds for, eligible brownfield sites. The Brownfields Utilization, Investment, and Local Development (BUILD) Act of March 2018 reauthorized and amended the Brownfields provisions of CERCLA. Finally, the Infrastructure Investment and Jobs Act (IIJA) of November 2021 provided additional funding and opportunities for communities to address the economic, social, and environmental challenges caused by brownfields sites. Pursuant to these provisions, EPA conducts annual Brownfields grant competitions. Recipients are selected from applications prepared in accordance with the “Application Guidelines for Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Grants,” and submitted in a national competition. The City of Caribou Maine, as a municipal unit of local government, was selected for Cleanup funding in the FY 2023 competition.

Currently an eyesore and target for vandalism and unsafe shelter for the homeless, the site is a reminder of the blight and economic challenges the community has experienced in the last quarter century. According to local police and adjacent landowners, the power plant and outbuildings are blighted, nuisance structures that attract vandals and homeless persons. City efforts to secure the site and repeated patrols have not deterred adverse activities. Removal of this obsolete, blighted facility will restore the natural riverfront, increase public safety, and remove an eyesore visible at the international gateway to the city. The projected re-use for the remediated diesel power plant site is a riverfront greenspace/park, in alignment not only with its location in a federally designated floodplain, and but also with community goals, future visions, and adjacent land use.

A 2009 Downtown Revitalization Plan, and the 2014 Comprehensive Plan discuss the need for removal of blight and revitalization of Caribou’s Aroostook riverfront. A Caribou Riverfront Revitalization Committee (CRRC) was officially established by the Council in 2020 to evaluate and plan for cleanup and development of the riverfront. The Planning Board is actively rezoning the area to promote mixed use and recreation. FEMA Flood Maps indicate that the eastern property boundary and structures are located within the 100-year floodplain (Zone A8).

General surface topography of the area is flat with a steep embankment to the Aroostook River. The primary soils type in the area is till, a heterogenous mixture of sand, silt, clay and

stones; there are no mapped wetlands within the property boundaries of the Site. The structures that need remediation include a 12,200-square foot brick and steel diesel electrical power plant operated from 1949 through 2012 and several outbuildings, including an oil tank building, oil storage building, pump station, pump house and two storage buildings. The identified contaminants at the site are waste oil, hazardous waste, and ACM: asbestos-containing materials (roofing, window glaze, floor tile, mastic, and stored materials).

To kick off the 2024 Comprehensive Planning process, an October 2022 visioning session attended by over fifty residents was a great success. Many younger citizens attended and contributed; much positive social media attention occurred. It was acknowledged that riverfront redevelopment is overdue, and the consensus was, “We need to keep the momentum going.” This brownfields proposal and its public hearing are catalysts for discussion leading to increased enthusiasm for redevelopment and removal of blight, and to reduce public safety concerns. Caribou’s sustainable brownfield reuse strategy has already been welcomed by citizens and provides the perfect opportunity to highlight riverfront revitalization efforts and increase community pride and sense of place for residents. We look forward to more public input during the formal Community Relations Plan for this Brownfields action.

Not only will remediation of contamination make possible a new community greenspace with a scenic view of the river, but the reuse plan is a first step and needed symbol of transformation, community pride, environmental stewardship and health and welfare. The international gateway to Caribou will become more scenic. Blighted structures and crumbling pavement will become a grassy park, restoring the natural landscape. Opportunities abound for historical and cultural education, such as an informational kiosk about the past importance of the site to the community and potential reuse and/or education about renewable hydropower at the dam. The primary benefit will be an overall increase in sense of place - the feeling of community connectedness - for improved well-being and community investment, as well as social resilience in times of economic and pandemic stress.

Cooperative agreement funding will be used to cover the costs of activities at or in direct support of brownfields sites as defined under CERCLA 101(39). The overall coordination of the cooperative agreement will be carried out by the Penny Thompson Project Manager, assisted by Carl Grant, the Finance Director, Richard Solman, the City Attorney, and Karen Gorman, Special Projects Coordinator with technical assistance and oversight to be performed by a Qualified Environmental Professional (QEP) and the VCP.

### **Describe your project and cleanup plan:**

This grant will provide the funds needed for cleanup of the Caribou Diesel Power Plant and associated outbuildings. Additional unforeseen remediation costs can be covered by Maine Department of Environmental Protection Brownfields funds, among other sources.

Demolition not necessary to cleanup will be funded/contracted by the City. The City of Caribou Public Works Dept will prepare the site for recreational reuse. Applicant expects to produce proposed leveraging consistent with terms of the announcement and narrative. The grant will stimulate the availability of potential additional resources.

Existing infrastructure includes electricity, and municipal water/sewer. Electricity will be used for efficiently lighting the area at night. Currently, no additional infrastructure needs are foreseen. An adjacent railroad right of way and unpaved roadway allow pedestrian and vehicle access to the site and an upstream recreational boat landing.

The proposed cleanup plan for the site is to remove all waste oil, hazardous substances, asbestos-containing materials (ACM) and hazardous waste. The identified contaminants at the site are waste oil, diesel, lube oil, antifreeze, degreaser/solvent, asbestos, mercury, lead, PCBs, and other hazardous materials. For this cleanup plan, waste oil refers to diesel, lube oil, waste oil, waste oil-contaminated water and sludge. The cleanup goal for the waste oil and hazardous substances is to eliminate the risk of a release to the environment, especially to adjacent Aroostook River. The cleanup goal for the identified ACM and hazardous waste is to eliminate the risk of human contact to asbestos, mercury, lead, PCBs, and other hazardous materials.

All waste oil and hazardous substances at the site will be removed for off-site disposal by a Maine licensed Hazardous Waste Transporter. All identified ACM and hazardous waste at the site will be removed for off-site disposal by a Maine licensed Asbestos Abatement Contractor. Removal of asbestos roofing at the diesel plant and diesel pump house includes demolition. All waste oil, hazardous substances, ACM, hazardous waste, and demolition debris will be properly removed, transported, and disposed in accordance with state and federal regulations, including but not limited to OSHA Hazardous Waste Operations and Emergency Management standards and Maine Waste Oil Management, Universal Waste, and Solid Waste Management Rules. Where possible, waste volume will be reduced by recycling. It is expected that the project will be completed over two years.

**2. FUNDING:       \$900,000**

**3. BUDGET:**

	Task 1 Cooperative Agreement Oversight	Task 2 Community Engagement	Task 3 Cleanup Planning & Reporting	Task 4 Cleanup Activities	<b>Total</b>
Personnel					0
Fringe Benefits					0
Travel	\$5,000				\$5,000
Equipment*	0	0	0	0	0
Supplies		\$2,000			\$2,000
Contractual	\$25,000	\$8,000	\$25,000	\$835,000	\$893,000
Other					0
Total Direct:					0
Indirect Costs:					0
<b>Total Budget</b>	<b>\$30,000</b>	<b>\$10,000</b>	<b>\$25,000</b>	<b>\$835,000</b>	<b>\$900,000</b>

\* EPA defines equipment as items that cost \$5,000 or more. Items costing less than \$5,000 are considered supplies.

**4. WORKPLAN TASKS:**

### Task 1: Cooperative Agreement Oversight

Task 1 - Cooperative Agreement Oversight Subtasks (Commitments) Pre-Cleanup	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
<b>Obtain QEP Services:</b> <ul style="list-style-type: none"> <li>• Prepare Request For Proposals/Qualifications, evaluate applications, conduct interviews, hire contractor</li> <li>• Prepare scope of work</li> <li>• Prioritize, track and evaluate contractor products</li> <li>• Conduct periodic project status meetings with contractor to discuss project issues and priorities</li> <li>• Conduct annual performance evaluations for contractor</li> </ul>	<b>Outputs:</b> <ul style="list-style-type: none"> <li>• High quality contractor work products that meet the recipient’s and EPA’s expectations</li> <li>• Confirmation in quarterly report that contractor selection was completed and made</li> </ul> <b>Outcomes:</b> <ul style="list-style-type: none"> <li>• Maintain effective work force to meet workplan commitments</li> </ul>	7/31/23	
<b>Reporting:</b> <ul style="list-style-type: none"> <li>• Prepare MBE/WBE annually, and FFR annually and at grant closeout</li> <li>• Enter site data in ACRES</li> <li>• Prepare Quarterly Reports via ACRES</li> <li>• Prepare final report and grant closeout material</li> </ul>	<b>Outputs:</b> <ul style="list-style-type: none"> <li>• Quarterly reports and other forms; updated ACRES database; final report and closeout forms</li> <li>• “Success Story” fact sheets</li> </ul> <b>Outcomes:</b> <ul style="list-style-type: none"> <li>• Ensures compliance with Terms &amp; Conditions reporting requirements</li> </ul>	9/30/23 ACRES updates and Quarterly Reports every quarter; MBE/WBE forms annually by 9/30; SF425 FFR annually by 10/30	
<b>Records:</b> <ul style="list-style-type: none"> <li>• Maintain grant files</li> <li>• Maintain site project files</li> <li>• Maintain financial records</li> </ul>	<b>Outputs:</b> <ul style="list-style-type: none"> <li>• Accurate and complete files suitable for audit purposes</li> </ul> <b>Outcomes:</b> <ul style="list-style-type: none"> <li>• High quality project records reflective of the work performed</li> </ul>	9/1/23 and thereafter	
<b>Request for Reimbursements or Advances:</b>	<b>Outputs:</b> <ul style="list-style-type: none"> <li>• Drawdowns from ASAP</li> </ul> <b>Outcomes:</b> <ul style="list-style-type: none"> <li>• Reduce unliquidated obligations</li> </ul>	9/1/23 and thereafter	
<b>Travel &amp; Training</b> <ul style="list-style-type: none"> <li>• Attend brownfields related meetings, training sessions and conferences</li> </ul>	<b>Outputs:</b> <ul style="list-style-type: none"> <li>• Attend Brownfields Conference in Detroit, MI</li> </ul> <b>Outcomes:</b> <ul style="list-style-type: none"> <li>• Improve Brownfields knowledge and expand networking opportunities</li> <li>• Attend New England Brownfields Summit</li> <li>• MAINE All Grantees Meeting</li> </ul>	8/7-11/23  2024 9/2023	

## Task 2: Community Engagement

Task 2 – Community Engagement Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
<b>Prepare Community Relations Plan</b> <ul style="list-style-type: none"> <li>• Prepare plan to involve public in cleanup activities</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Plan for involving the community in cleanup activities</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Improve understanding and participation in cleanup and redevelopment process</li> </ul>	8/31/23	
<b>Establish Information Repository</b>	Outputs: <ul style="list-style-type: none"> <li>• Repository of documents which allows public to review site assessment &amp; cleanup history</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Improve understanding of how cleanup alternative was selected</li> </ul>	8/31/23	
<b>Implement 30-Day Public Comment Period on ABCA</b>	Outputs: <ul style="list-style-type: none"> <li>• Allow for review and comment of cleanup related documents</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Allow for consensus on cleanup</li> </ul>	9/30/23	
<b>Public Meetings</b>	Outputs: <ul style="list-style-type: none"> <li>• Meetings which inform public of cleanup activities and provide a chance for input &amp; comment</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Improve understanding of cleanup and allow for potential modifications based on public input</li> </ul>	8/01/23	

### Task 3: Cleanup Planning and Reporting

Task 3 – Cleanup Planning and Reporting Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
<b>Hold a kickoff meeting with State, EPA and QEP</b>	Outputs: <ul style="list-style-type: none"> <li>Held meeting</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>Ensure all agencies are in agreement with cleanup plan</li> </ul>	8/31/23	
<b>Ensure Site is Enrolled in VCP</b> <ul style="list-style-type: none"> <li>Ensure the grantee has enrolled site in the applicable state response program</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>Site is enrolled in applicable state response program</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>Cleanup is in compliance with state response program</li> </ul>	8/31/23	
<b>Historic Preservation</b> <ul style="list-style-type: none"> <li>Assist EPA project Officer in collecting information and determining if Section 106 applies</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>Information and reports required to comply with Section 106 Historic Preservation requirements</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>Compliance with Section 106 Historic Preservation requirements</li> </ul>	8/31/23	
<b>Prepare Analysis of Brownfields Cleanup Alternatives (ABCA)</b>	Outputs: <ul style="list-style-type: none"> <li>Approved ABCA documenting how and why cleanup alternative was selected</li> <li>ABCA placed in information repository, etc.</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>Ensure proper cleanup alternative is selected and communicated to the public</li> </ul>	8/31/23	
<b>Resilient and Greener Cleanups</b> <ul style="list-style-type: none"> <li>Evaluate the climate change vulnerability of a site and potential cleanup alternatives</li> <li>Include climate change vulnerability in the effectiveness evaluation of cleanup alternatives.</li> <li>Incorporate resilient and green remediation principles/techniques into the cleanup plan for your project</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>Climate resiliency and greener cleanup language in ABCA and RFP</li> <li>Track and report climate resiliency and greener cleanup actions in ACRES</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>Resilient and more sustainable cleanups</li> </ul>	Before, during, and after remedial activities	

<p><b>Prepare Decision Document</b></p> <ul style="list-style-type: none"> <li>• Document results of public comment period and public meeting to include comments received, public meeting attendance, response to relevant comments, selection of final cleanup remedy, any changes to the final cleanup remedy, etc.</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>• Memo or letter, with appropriate attachments</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• Ensure that public comment process is documented and final cleanup remedy is selected</li> </ul>	10/15/23	
<p><b>Prepare Remedial Design &amp; Engineering Documents</b></p> <ul style="list-style-type: none"> <li>• Prepare appropriate remedial design documents for state response program, engineering design documents for cleanup contractors to perform work (including Davis-Bacon requirements), and a budget detailing how EPA funds will be used to clean up sites</li> </ul>	<p>• Approved remedial action and engineering/design documents and an approved budget</p> <ul style="list-style-type: none"> <li>• Place documents in information repository, etc.</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• Ensure cleanup will be done in compliance with state response program and EPA funds will be used for eligible costs</li> </ul>	9/30/23	
<p><b>Prepare Site Specific Quality Assurance Project Plan and Health and Safety Plan</b></p> <ul style="list-style-type: none"> <li>• Prepare a SSQAPP for any environmental post cleanup sampling to be conducted on sites and submit to EPA for approval</li> </ul>	<p>Outputs:</p> <ul style="list-style-type: none"> <li>• EPA approved SSQAPP</li> <li>• Place SSQAPP in information repository</li> </ul> <p>Outcomes:</p> <ul style="list-style-type: none"> <li>• Ensure proper confirmatory testing methods and analytical data results are achieved</li> </ul>	9/30/23	

## Task 4: Cleanup Activities

Task 4 – Cleanup Activities Subtasks (Commitments)	Anticipated Outputs (projected activities, deliverables, reports) and Anticipated Outcomes (projected results, effects, improvements)	Anticipated Accomplishment Date(s) (Month/Year)	Actual Accomplishment Date(s)
<b>Oversight of Cleanup Activities</b> <ul style="list-style-type: none"> <li>• QEP conducts appropriate site inspections during remediation to ensure compliance with cleanup plans</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Number of inspections</li> <li>• Site reports by QEP</li> <li>• Documents placed in information repository</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Ensure cleanup is conducted in compliance with VCP</li> </ul>	1/31/24	
<b>Davis-Bacon Documentation</b> <ul style="list-style-type: none"> <li>• Conduct site inspections to ensure proper wage rates and posters are available to workers on-site</li> <li>• Collect, review and maintain payrolls</li> <li>• Conduct on-site labor interviews</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Payrolls, labor interviews, etc.</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Ensure compliance with Davis-Bacon requirements</li> </ul>	01/31/24	
<b>Collection of Post-Cleanup Samples</b>	Outputs: <ul style="list-style-type: none"> <li>• Number of samples and analytical results</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Ensure cleanup has met VCP cleanup levels</li> </ul>	7/31/24	
<b>Cleanup Documentation</b> <ul style="list-style-type: none"> <li>• Prepare and submit close-out documentation to state indicating that cleanup is complete and protective to human health and the environment and identifies any institutional controls and long-term monitoring</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Final cleanup reports documenting cleanup is complete</li> <li>• Place documents in repository, etc.</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• State approval of cleanup and ensure cleanup is protective of human health and the environment</li> </ul>	7/31/24	
<b>Cleanup Complete Documentation</b> <ul style="list-style-type: none"> <li>• Receive final cleanup complete letter from state and submit to EPA</li> </ul>	Outputs: <ul style="list-style-type: none"> <li>• Letter from State</li> <li>• Letter submitted to EPA</li> <li>• Placed letter or documentation in information repository, reported in ACRES, and quarterly reports, etc.</li> </ul> Outcomes: <ul style="list-style-type: none"> <li>• Site is officially clean and ready for reuse</li> <li>• 3.2 Brownfields property acres available for reuse</li> </ul>	7/31/24	



## **5. QUALITY ASSURANCE**

Prior to undertaking confirmatory sampling, the City of Caribou will prepare and submit a Quality Assurance Project Plan (QAPP) which meets the approval of the U.S. EPA Region I Brownfields Program. The QAPP will describe the sampling and analytical strategies, and the methods and procedures that will be used. QAPP approval will be obtained prior to performing any field activity.

## **6. PRE-AWARD COSTS**

The City of Caribou requests the approval of pre-award costs for this cooperative agreement. It is estimated that we will need \$4,000 to do the following activities: participate in National Brownfields Training Conference (August 2023), and participate in the Maine All Grantees meeting (September 2023).

## **7. BUDGET DETAIL - ATTACHMENT 1**

## 2023 Workplan Budget Detail for Cleanup Grants

### Personnel (Should not exceed 10% of total federal funds):

Item	Rate/Hour	Hours	Request from EPA
<b>Total</b>		<b>0</b>	<b>\$0</b>

### Fringe Benefits:

Rate/Base/Composition	Request from EPA
	\$0
<b>Total</b>	<b>\$0</b>

### Travel:

Item	Request from EPA
Travel to 2023 National Brownfields Conference including lodging, air, per diem, and registration fees for 2 employees	\$3,000
Travel to 2023 Maine All Grantees Meeting ( <i>Applicable to Maine grantees only</i> )	\$1,000
Travel to 2024 Region 1 Summit	\$1,000
<b>Total</b>	<b>\$5,000</b>

### Supplies:

Item	Request from EPA
Postage for community meeting flyers	\$1,000
Brochures for public outreach	\$1,000
<b>Total</b>	<b>\$2,000</b>

### Contractual:

Item	Request from EPA
Qualified Environmental Professional / Media Consultant / Licensed Hazardous Waste Transporter / Licensed Abatement / Demolition Contractor	\$893,000
<b>Total</b>	<b>\$893,000</b>

### Other:

Item	Request from EPA
	\$0
	\$0
<b>Total</b>	<b>\$0</b>

### Indirect Administrative Costs (This amount plus any direct administrative costs shall not exceed 5% of total federal funds):

Item	Request from EPA
Maximum allowable Indirect costs =	\$45,000.00
<b>Total</b>	<b>\$0</b>

### Total Budget Summary:

Item	Request from EPA
Personnel	\$0
Fringe Benefits	\$0
Travel	\$5,000
Supplies	\$2,000
Contractual	\$893,000
Other	\$0
Indirect Costs	\$0
<b>Total</b>	<b>\$900,000</b>

### Notes:

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