

CLEANUP WORKPLAN

Oil Regional Alliance

Workplan for CERCLA Section 104(k) Cleanup Cooperative Agreement

(October 1, 2024, thru September 1, 2027)

1. CFDA 66.818 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. Entities are selected from proposals prepared in accordance with the “Proposal Guidelines for Brownfield Assessment, Revolving Loan Fund, and Cleanup Grants,” and submitted in a national competition. Oil Regional Alliance, as a non-profit was selected for Cleanup funding in the FY 2024 competition.

The Kraft Dahlstrom brownfield site is located in Oil City, Pennsylvania. The community has been in decline since the 1980s due to the loss of major oil and manufacturing industries. The Kraft Dahlstrom site, with its salvage material and decrepit buildings, has created a barrier that physically separates the “Polish Hill” neighborhood from the rest of the community, resulting in significant disinvestment in the neighborhood and severe negative impacts to its residents. The goal of the project to be funded by this cooperative agreement is to remediate the Kraft Dahlstrom site and to facilitate its redevelopment. Remediating the project site will improve public health and economic outcomes by expanding job training and increasing local job growth; providing healthy foods to residents currently in a food desert; improving access to small retail and restaurants; and decreasing truck traffic and resulting emissions by allowing Webco Industries access to a scale house across the street from its plant.

These goals will be accomplished by performing non-site-specific tasks and site-specific tasks. Non-site-specific tasks include hiring a Qualified Environmental Professional (QEP), obtaining remedial contractor services and a grant manager, and performing public outreach. Site-specific tasks include the creation of a Health & Safety Plan (HSP), removing contaminated materials and capping the property to prevent further contamination, and creating project closure report. 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 ORA’s Executive Vice President, the Project Director and assisted by the Chief Executive with technical assistance and oversight to be performed by an environmental consultant.

Describe your project and cleanup plan: The Kraft Dahlstrom site is located at 58 Spruce Street and is a combined parcel. ORA purchased and combined the Gil E Dahlstrom Iron & Metal site with the Kraft Concrete Products site to create a continuous 3.79-acre brownfield property. A recently completed Phase II ESA found a heavy concentration of metals in soils on the Dahlstrom parcel, including antimony, arsenic, copper, lead, nickel, zinc, and mercury, in addition to arsenic on the Kraft parcel. The property also has remnants of scrap yard operations and two vacant buildings. The first is a former dry-cleaning building, and the second is the former scrapyard office and scale house.

ORA proposes to remediate the site by demolishing and removing or capping all contaminated materials, while monitoring air and water quality throughout the process. The remedial cap will be either clean soil or asphalt, depending on the reuse in particular areas of the site. Project activities will include the development of a health and safety plan, project oversight during remediation, revegetation, and storm water improvements for the site following removal. Contaminated media to be removed include tires, soil contaminated with antimony, arsenic, copper, lead, nickel, and zinc, and other yet-to-be-identified substances. Where levels of metals current do not exceed regulatory action levels, the project will address metals through qualitative risk assessment since direct contact will not have unacceptable risk to future users of the site. This will effectively address the heavy concentration of metals in soils found during a Phase II Environmental Assessment.

2. FUNDING \$999,730 (Federal Funds)

3. BUDGET

Budget Categories	Project Tasks				Project Closure Report/Regulatory Coordination	Total
	Programmatic Management	HSP	Procurement - Remediation Contractor	Removal of Soil and Other Debris		
Personnel	\$44,106					\$44,106
Fringe	\$5,874					\$5,874
Travel						
Equipment						
Supplies						
Contractual	8,800	\$4,950	\$15,000	\$21,000	\$30,000	\$79,750
Construction				\$870,000		\$870,000
Other – Administrative						
Total Direct Costs	\$58,780	\$4,950	\$15,000	\$891,000	\$30,000	\$999,730
Indirect Costs						
Total Federal Funding	\$58,780	\$4,950	\$15,000	\$891,000	\$30,000	\$999,730
Total Budget	\$58,780	\$4,950	\$15,000	\$891,000	\$30,000	\$999,730

* EPA defines equipment as items that cost \$5000 or more. Items costing less than \$5000 are considered supplies

4. WORKPLAN TASKS

Task 1 - Programmatic Management: 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)
Oversee the process to ensure selection of a Qualified Environmental Professional (QEP) and a Grant Manager	Outputs: - Bid documents for a QEP - Bid documents for a Grant Manager Outcomes: - ORA contracts with highly qualified QEP - ORA contracts with highly qualified Grant Manager	October 2024	
Hold regular meetings for the remainder of the period of performance to ensure the project remains on schedule and within budget	Outputs: - Project Kick-off Meeting - Monthly Project Update Meetings Outcomes: - Project remains on time and within budget	December 2024 and Ongoing monthly	

Task 2 – Health & Safety Plan: 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)
Qualified Environmental Professional (QEP) will oversee the development of a HASP in accordance with relevant OSHA guidelines	Outputs: - Site Specific HASP Outcomes: - On-site workers and the public are protected from environmental hazards during cleanup.	January 2024	

Task 3 – Procurement of Remediation Contractor 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)
The Project Manager and QEP will hold a public meeting to explain and accept public input on the remediation plan.	Outputs: - Hold a public meeting to obtain public input Outcomes: - Ensure that public comment process is documented and final cleanup remedy is selected	March 2025	
The QEP will prepare project-specific bid specifications and bid documents	Outputs: - Bid Specifications/Bid Documents Outcomes: - A competitive bid package is assembled	April 2025	
The QEP will oversee a mandatory pre-bid site meeting and provide written answers to written questions provided by the bidders, evaluate and rank bids received, and present professional opinions regarding bid scopes and costs to the Project Manager for consideration and selection of the Remediation Contractor.	Outputs: - Pre-Bid meeting is held - Written answers to bid questions are provided - QEP provides professional recommendation to Project Manager to assist in selection of a Remediation Contractor Outcomes: - ORA receives knowledgeable and competitive bids - ORA awards a responsive and competitive bid	May 2025	

Task 4 – Removal of Soil and Other Debris 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)
Cleanup activities by Remediation Contractor including • Demolition • Waste management • Waste removal • Waste transportation and disposal • Site restoration	Outputs: • Survey work completed • Site Grading • Tons of contaminated soil removed and disposed • Number of buildings demolished • Amount of clean soil deposited • Amount of asphalt used to cap site Outcomes: • Site is fully remediated	October 2025-March 2026	
Remediation Contractor will implement HSAP including • Obtaining associated permits • Air monitoring • Protecting the health and safety of its employees and subcontractors	Outputs: • Permits obtained from PA DEP • Number of days without a health or safety incident Outcomes: • Employee health is safeguarded • Community health is protected	October 2025-March 2026	
QEP will act as the owner representative • Provide field oversight • Ensure all bid requirements are satisfied • Review contractor invoices • Review change orders	Outputs: • Number of inspections • Site reports by QEP • Documents placed in information repository Outcomes: • Ensure cleanup is conducted in compliance with VCP	October 2025-March 2026	
Task 5 – Project Closure Report and Regulatory Coordination 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)
QEP will collect and analyze post-cleanup samples	Outputs: • Number of samples and analytical results Outcomes: • Ensure cleanup has met VCP cleanup levels	April 2026-September 2026	

Cleanup Documentation • The QEP will prepare and submit close-out documentation to PA DEP indicating that cleanup is complete and protective to human health and the environment and identifies any institutional controls and long term monitoring	Outputs: • Final cleanup reports documenting cleanup is complete • Place documents in repository, etc. Outcomes: • PA DEP approval of cleanup • Ensure cleanup is protective of human health and the environment	April 2026-September 2026	
Cleanup Complete Documentation • Receive final cleanup complete letter from QEP and submit to EPA	Outputs: • Letter from QEP • Letter submitted to EPA • Placed letter or documentation in information repository, reported in ACRES, and quarterly reports, etc. Outcomes: • Site is officially clean and ready for reuse • Estimated number of brownfields property acres available for reuse	April 2026-September 2026	

5. QUALITY ASSURANCE

When environmental sampling is to be conducted as part of a cleanup grant funded wholly or in part with EPA funds, a Quality Management Plan and either site specific Quality Assurance Project Plan (QAPP) or Quality Assurance Program Plan (QAPrP) must be prepared and submitted to EPA for review and approval 45 days prior to performance of any sampling. A cleanup cooperative agreement should result in either a site-specific QAPP and field sampling plan (FSP) developed together and in the same document OR a QAPrP with FSPs for each property addressed under a cleanup. *[Note: sampling performed without an approved QAPrP, QAPP and FSP is not an allowable cost]*. The recipient can receive guidance on preparing Quality Assurance documents from their project officer. Additional guidance will be issued by EPA.

Prior to undertaking activities involving the collection of environmental samples, the Oil Regional Alliance will prepare and submit a Quality Management Plan and either a Quality Assurance Project Plan (QAPP) and field sampling plan (FSP) combination OR a Quality Assurance Program Plan (QAPrP) along with field sampling plan (FSP) which meets the approval of the U.S. EPA Region III Brownfields Program. The QAPP/FSP or QAPrP with FSP for each site will describe the sampling and analytical strategies, methods and procedures approved by EPA that will be used in all sampling activities. The QAPP/QAPrP/FSP will be submitted at least 45 days prior to the initiation of field activities and approval will be obtained prior to performing any field sampling.

6. SCHEDULE AND DELIVERABLES

Covered by Section #4.

7.0 LEVERAGING

Firm commitments of leveraged funding described in the applicant's proposal are referenced below. These commitments must be tracked in the quarterly progress reports as well as ACRES leveraged funds. Since these commitments can come from public or private sources, there is the possibility that the commitments might not materialize through no fault of the grantee. Since there is an uncertainty about these funds, they are not included on the SF424, SF424A, and budget detail.

The recipient agrees to provide the proposed leveraged funding, including any voluntary cost-share contribution or overmatch that is described in its application dated month/day/year. If the proposed leveraging does not materialize during the period of award performance and the recipient does not provide a satisfactory explanation, the Agency may consider this factor in evaluating future proposals from the recipient. In addition, if the proposed leveraging does not materialize during the period of award performance, then EPA may reconsider the legitimacy of the award. If EPA determines that the recipient knowingly or recklessly provided inaccurate information regarding the leveraged funding that the recipient described in its application dated November 13, 2023, EPA may take action as authorized by 40 CFR Parts 30 or 31 and/or 2 CFR Part 180, as applicable.

- A. The Oil Regional Alliance did not have firm commitments of leverage in its application.

8.0 PRE-AWARD COSTS

The grantee is not requesting Pre-Award Costs.