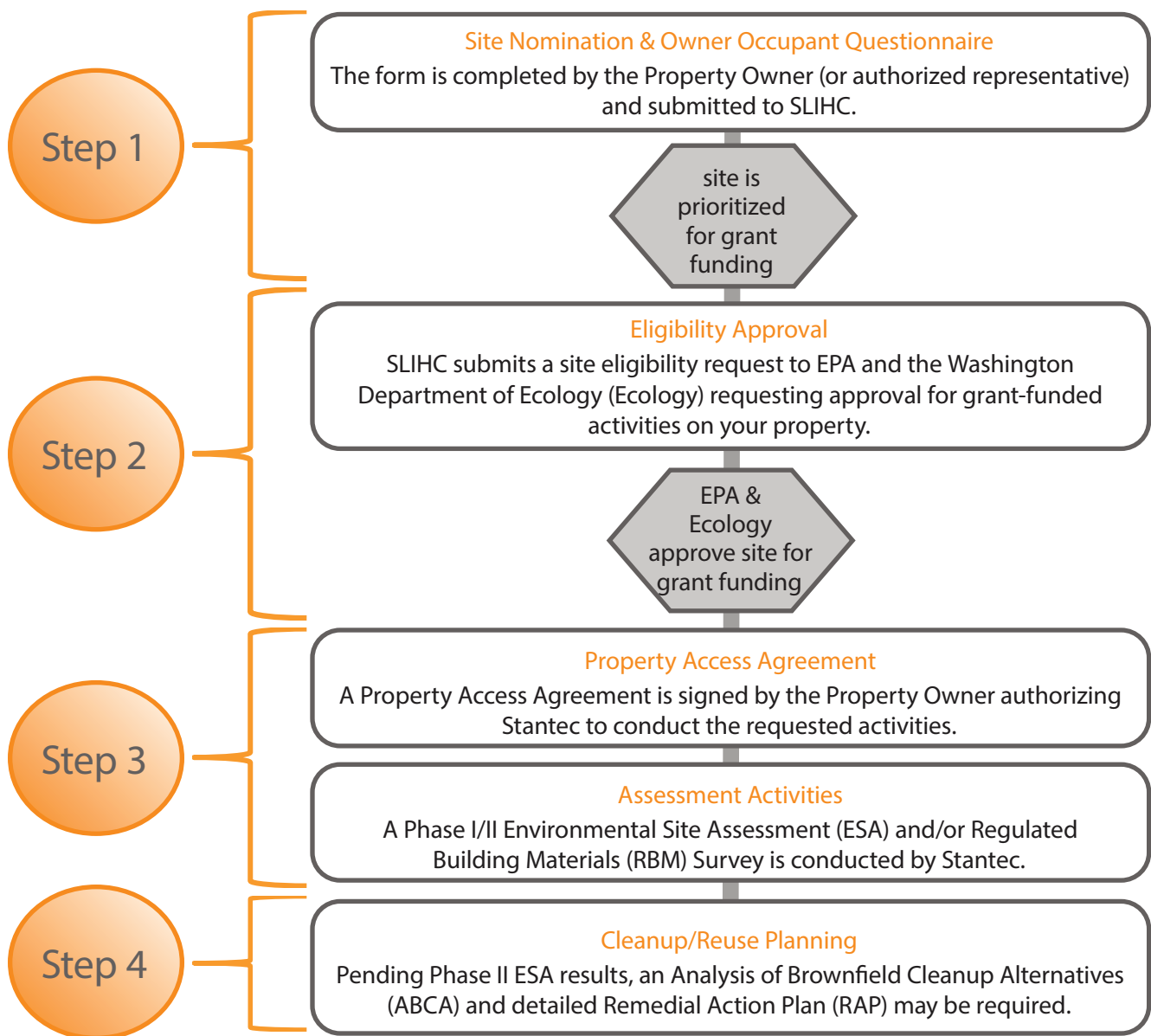


Process Guide for Property Owners & Stakeholders

Brownfield Site Reuse & Revitalization Program

Spokane Low Income Housing Consortium

This Process Guide provides an overview of key activities involved the Brownfield Site Reuse and Revitalization Program. The Program is funded by an Environmental Protection Agency (EPA) Brownfields Assessment Grant awarded to the Spokane Low Income Housing Consortium (SLIHC). The program is managed by SLIHC with support from an environmental consulting team led by Stantec Consulting Services Inc. (Stantec). The figure below outlines the key steps involved in the assessment and cleanup planning process. Descriptions of each step are provided on the following pages.



Key Steps

1 Site Nomination & Owner Occupant Questionnaire

A Site Nomination and Owner Occupant Questionnaire is filled out by the property owner (or authorized representative) and submitted to the SLIHC for review to confirm the property meets baseline eligibility and community benefit (or prioritization) criteria. Generally, to be considered eligible for grant funding, the following criteria must be met:

1. the property is vacant, underutilized, or undergoing transition;
2. the property has potential impacts from petroleum and/or hazardous substances;
3. the property exhibits high potential for redevelopment and/or other opportunities to benefit the community; and
4. the property is not included on the EPA National Priority "Superfund" List, under a Consent Order with Ecology, or targeted for any federal or state enforcement action.

Properties that are nominated and meet the baseline eligibility criteria will be prioritized based on several factors, including greatest need and potential for community benefit. Site Nomination and Owner Occupant Questionnaires can be obtained from <https://my.spokanecity.org/udcoalition> or by emailing Ben Stuckart (benstuckart@gmail.com).

2 Eligibility Approval

The information provided on your Site Nomination and Owner Occupant Questionnaire will be used to prepare a Site Eligibility Determination Request ("ED Request"). The ED Request will be prepared by SLIHC and Stantec for submittal to the EPA and Ecology on your behalf to obtain approval for the requested grant-funded activities on your property.

Estimated Timeline: 4-6 weeks

Note: Please let us know if your request for assessment activities is related to due diligence for a property transaction already underway as there may be options to submit an expedited ED Request.

3 Property Access Agreement & Assessment Activities

Property Access Agreement

Prior to initiating assessment activities, we must receive approval from you (in the form of a Property Access Agreement that will be provided for your review and signature), authorizing our environmental consultant (Stantec) to perform the requested activities on your property.

Estimated Timeline: 2-4 weeks

Phase I Environmental Site Assessment (ESA)

A Phase I ESA is a research study intended to assess the environmental condition of a property and identify potential areas where petroleum or hazardous substances may have been released. A Phase I ESA determines if any recognized environmental conditions (“RECs”) exist on the property; however, it does not involve collecting physical samples to confirm if there are actual impacts to the property.

Purpose of a Phase I ESA:

- Assess potential impacts from petroleum or hazardous substances that may impede redevelopment.
- Establish baseline conditions for liability protection.
- Support property sale/acquisition activities.
- Provide documentation typically required by lenders to secure loans.
- Update an existing Phase I ESA that is out of date (the reports have a shelf life of one year)

The Phase I ESA is comprised of the following:

- 1. Kick-off Meeting:** If needed, a kick-off meeting will be scheduled with the property owner (or authorized representative), SLIHC, and Stantec to discuss the Phase I ESA process
- 2. Site Visit and Interview:** After you sign the Property Access Agreement, Stantec will schedule a site visit and interview(s) with the property owner, current occupant(s), and/or other authorized representatives who are knowledgeable about the site. Site visits typically take two hours to complete and interviews are generally limited to 30 minutes.
- 3. Desktop Study:** Stantec will complete a comprehensive property background check that includes reviewing current and historical documents and regulatory databases to determine if any potential environmental concerns/RECs exist that may impact property reuse.
- 4. Prepare Report:** A Phase I ESA Report will be prepared to summarize the findings of the site visit, interviews, and desktop study. A digital copy of the report will be provided to you and shared with the SLIHC, Ecology and EPA.

Shelf Life: 180 days (Phase I ESA ideally completed within 180 days of transaction)

Estimated Timeline: 1-2 months

Phase II ESA

A Phase II ESA involves a physical study where environmental samples are collected and analyzed to characterize the type, distribution and extent of substances in the environment (if present).

Purpose of a Phase II ESA:

- Evaluate the findings of the Phase I ESA (if RECs are identified).
- Support the identification of environmental impediments to redevelopment or reuse of a property.
- Identify whether a release has occurred.
- Support efforts to obtain regulatory closure from Ecology.

The Phase II ESA is comprised of the following:

1. **Kick-off Meeting:** If needed, a kick-off meeting will be scheduled with the property owner (or authorized representative), SLIHC, and Stantec to discuss the Phase II ESA process.
2. **Work Plan:** Stantec will prepare a Sampling and Analysis Plan (SAP) for submittal to EPA and Ecology for approval prior to initiating sampling activities.
3. **Fieldwork:** After the SAP is approved, environmental samples (i.e. soil, groundwater, soil vapor, etc.) will be collected and analyzed. The study will characterize the type, distribution, and extent of petroleum or hazardous substances (if present).
4. **Prepare Report:** A Phase II ESA Report will be prepared to summarize the work performed, analytical results, and conclusions. A digital copy of the report will be provided to you and shared with SLIHC, Ecology and EPA.

Shelf Life: Indefinite (+/- changes in site conditions, sampling methods, regulations, etc.)

Estimated Timeline: 2-3 months

Regulated Building Materials (RBM) Survey

A RBM survey involves a physical study where samples of potentially hazardous building materials are collected and tested to confirm if regulated substances are present. Surveys can be conducted concurrently with a Phase I/II ESA (if desired).

Purpose of a RBM Survey:

- Determine if asbestos containing materials (ACM), lead-based paint (LBP), Polychlorinated Biphenyls (PCBs), or other hazardous substances are present in building materials.
- Evaluate regulations that apply to the disturbance or disposal of confirmed hazardous materials before undertaking a building remodel, renovation or demolition.

The RBM survey is comprised of the following:

1. **Work Plan:** Stantec will prepare a SAP for submittal to EPA and the Washington Department of Health (DOH) for approval prior to initiating sampling activities. (Note: A cursory review of exterior and interior building conditions may be necessary to aid in developing a sampling strategy.)
2. **Fieldwork:** After the SAP is approved by EPA and DOH, building material samples will be collected and submitted to a laboratory for analysis.
3. **Prepare Report:** The RBM Survey Report will be prepared to summarize the work performed, testing results and conclusions. A digital copy of the report will be provided to you and shared with SLIHC, DOH, Ecology and EPA.

Shelf Life: Indefinite (+/- changes in site conditions, sampling methods, regulations, etc.)

Estimated Timeline: 2-3 months

4 Cleanup/Reuse Planning

Analysis of Brownfield Cleanup Alternatives (ABCA)

An ABCA is an analysis of remedial options and methods potentially capable of achieving the required level of cleanup.

Purpose of an ABCA:

- Evaluate technical and economic feasibility of cleanup alternatives with reuse plans and redevelopment strategies.
- Evaluate and select preferred alternative.
- Satisfies EPA requirements.
- Support efforts to apply for an EPA Cleanup Grant.

An ABCA is comprised of the following:

- 1. Kick-off Meeting:** If needed, a kick-off meeting will be scheduled with the property owner (or authorized representative), SLIHC, and Stantec.
- 2. Prepare Report:** A digital copy of the draft report will be provided to you, SLIHC, Ecology, and EPA for comments prior to finalizing the document. A digital copy of the final report will also be shared with all parties.

Shelf Life: Indefinite (+/- changes in site conditions, sampling methods, regulations, etc.)

Estimated Timeline: 6-8 weeks

Remedial Action Plan (RAP)

A RAP is a detailed plan to implement the preferred remedial option to achieve the required level of cleanup.

Purpose of a RAP:

- Detailed implementation plan for selected cleanup alternative.
- Detailed cost estimate for selected cleanup alternative.
- Support efforts to apply for an EPA Brownfield Cleanup Grant.

A RAP is comprised of the following:

- 1. Kick-off Meeting:** If needed, a kick-off meeting will be scheduled with the property owner (or authorized representative), SLIHC, and Stantec.
- 2. Prepare Plan:** A digital copy of the draft plan will be provided to you, the SLIHC, Ecology, and EPA for comments prior to finalizing the document. A digital copy of the final plan will also be shared with all parties.

Shelf Life: Indefinite (+/- changes in site conditions, sampling methods, regulations, etc.)

Estimated Timeline: 6-8 weeks

Frequently Asked Questions

Which sites are eligible for grant funds?

In general, the property must be potentially impacted by petroleum or hazardous substances, underutilized or undergoing transition, and meet the following criteria:

- Exhibits high potential for redevelopment and/or other opportunities to benefit the community.
- Is not included on the EPA National Priority "Superfund" List, under a Consent Order with Ecology, or targeted for federal or state enforcement action.

How long is grant funding available?

Grant funding is committed through Summer 2022 and is available for approved sites on a first-come first-served basis.

Will the grant pay for cleanup activities?

No. Under this program, grants funds can be used to conduct assessments and develop cleanup plans but cannot be used to implement a cleanup plan. Please reach out to SLIHC to discuss funding sources for cleanup activities.

Can I be reimbursed for previous assessment activities?

No. Grant funds are not retroactive and cannot reimburse you for past assessment or related activities.

Are grant funds given to me to pay for the consultant?

No. The grant is administered by the SLIHC who will pay the consultant (Stantec) directly for approved assessment and/or related activities on your property.

Do I enter a contract with the environmental consultant?

No. If your property is approved for grant funding, you will be required to sign a Property Access Agreement that permits SLIHC's consultant (Stantec) access to the site to perform the requested activities.

Will an assessment affect my property value?

It depends. An assessment itself does not directly affect property value. Property values are often negatively affected by uncertainty regarding site history and the financial and legal risks of potential environmental impacts. ESAs allow property owners to quantify the amount of contamination (or lack thereof) on a

property. For properties with little to no contamination, this knowledge may increase marketability. For sites with significant contamination, having an assessment completed using EPA funding removes this as a potential cost to be paid for by the property owner or an interested buyer as part of their due diligence process. Having assessments completed can help to better position properties for grants or tax incentives that can be used to pay for cleanup and support redevelopment.

Is the project limited to a specific area?

The project will prioritize properties located in the Spokane University District.

How will decisions be made on whether work at a specific site will be funded?

In general, all sites that are nominated will be given consideration for funding. Upon receipt of a nomination form, an initial review will be conducted by SLIHC, EPA and Ecology to determine whether the site is a good fit for the program (based on its potential to support economic, environmental, or community goals), as well as the likelihood it will meet EPA's site eligibility requirements. Sites/projects will also be evaluated on the likelihood that they will be deemed eligible for use of funding, the certainty of securing site access to perform assessment activities, and other factors.

How do I obtain additional information?

For more information or to submit a site for grant funding consideration, please contact SLIHC or visit our project webpage:

<https://my.spokanecity.org/udcoalition>.

Contact Information:

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Disclaimer: Although this project has been funded wholly or in part by the EPA, the contents of this document do not necessarily reflect the views and policies of the EPA.