

**City of Barberton, Ohio**

**U.S. Environmental Protection Agency Work Plan  
For Brownfields Assessment Grants  
(Hazardous Substances and Petroleum)**

**Project Contact:**

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**Project Period: October 1, 2019 – September 30, 2022**

This project supports EPA Strategic Plan Goal 1 – Core Mission, Objective 3 – Revitalize Land and Prevent Contamination. Specifically, the recipient will inventory, characterize, assess, plan reuse of brownfields properties and conduct planning and community involvement activities to encourage revitalization and reuse of brownfields sites. Project Period is 3 years.

CFDA: 66.818

CERCLA Authority: 104(k)(2)

DCN: STX

Budget FY: 19

Appropriation: E4

Budget Org: 0500AG7

Object Class: 4114

Program Results Code (PRC): Hazardous Sub 301D79 (Action Code: NY);

Petroleum 301D79XBP (Action Code: OR)

\* Output and Outcome Information can be found in the Environmental Results Table on pg. 10.

## **I. INTRODUCTION AND PROJECT OVERVIEW**

Barberton is an industrial, blue-collar community of 26,120 residents located 40 miles south of Cleveland in northeastern Ohio. Founded in 1891 by the entrepreneur and philanthropist Ohio Columbus (O.C.) Barber, known as the “Match King” because of his controlling interest in the Diamond Match Company, the village of Barberton was sited for its access to the Ohio & Erie Canal system as well as numerous rail lines. By 1906, Barberton boasted the largest match, soda ash, boiler, valve, and sewer pipe factories in the United States. Today it remains home to plants for industrial employers including BWX Technologies, a leading supplier of nuclear components and fuel to the U.S. government; Arconic (formerly ALCOA), a global metals engineering specialist; Preferred Compounding, the second largest custom rubber compounder in North America; Wright Tools, manufactured in Barberton since 1927; and PPG Industries, the second largest coatings company in the world.

Unfortunately, Barberton is struggling to retain its few remaining industrial employers. In 2018, the City’s largest employer, Babcock & Wilcox, announced that its global headquarters would depart the City in 2019, taking with it over 600 jobs and \$1.3 million in tax revenue – 10% of the City’s annual municipal budget. Decades of industrial flight and regional economic decline have left the City with vast tracts of contaminated land, decaying public infrastructure, a depleted tax base, and high unemployment. Brownfields lining the Tuscarawas River and Wolf Creek are a blighting influence on the community and have left a legacy of perceived contamination throughout our City and our watersheds. Through previous planning and inventorying activities, the City has estimated that brownfields cover 16.6% or one-sixth of Barberton’s nine square miles of land. As outlined in the City’s Master Plan, target areas for brownfields assessment include former industrial corridors along the Tuscarawas River and Wolf Creek and the City’s historic downtown commercial properties.

The City intends to use U.S. EPA funds to (1) complete Phase I and II Property Assessments (PAs), remedial plans, associated planning and public outreach and (2) further the work started with prior state and federal money on eligible brownfields properties within the City.

## **II. MANAGEMENT STRUCTURE**

The City of Barberton is able to manage grants and oversee assessment work with internal staff experienced in brownfields activities. The City’s Planning Director and Staff will manage the administration and implementation of the grants with support from the City’s Engineering and Law Departments and the Office of the Mayor. Members of this team have helped to oversee other brownfields projects in the City as indicated below, and are experienced in all aspects of brownfields redevelopment from environmental assessment through remediation and redevelopment. The project management structure for implementation of the grant is as follows:

### **Joseph Stefan, Director of Planning & Community Development**

Mr. Stefan will manage the grant, including all aspects of the grant, from procurement of environmental services from qualified contractors, contract administration, access agreements, contract issues, deadlines and deliverables to the state (including quarterly reporting). He has related experience as being a key part of the City team that successfully implemented and closed out four previous U.S. EPA grants. Mr. Stefan currently administers the City’s CDBG Entitlement grant which includes timely drawing of funds, public outreach and the monitoring of subrecipients. The Planning Director also administers other federal, state, and private grants when funding becomes available. Mr. Stefan holds a bachelor’s degree in Technical Management with a specialization of Project Management. He has over 13 years of experience administering grant funds from federal, state, and local organizations.

### **Michael Vinay, Director of Public Service**

Mr. Vinay will manage the grant in the absence of the Planning Director. Mr. Vinay currently serves as the City’s Director of Public Service. Prior to assuming his current position, Mr. Vinay

served the City in many different capacities as a Building Inspector Sr. Project/grant administration functions include Federal, State, County and private Foundation funded grant activities, including RFPs, RFQs, contract inception/administration, project management, grant reporting, deliverables, reimbursement compliance. Mr. Vinay holds a bachelor's degree in Organizational Supervision and an Associate of Applied Science Degree in Construction Engineering. He has over fifteen years of grant administration experience.

#### **Stacy Carr, Strategic Planner**

Mrs. Carr has been with the City of Barberton for the past 17 years, the past 11 years have been spent in the Planning Department. Mrs. Carr administers the City's Land Bank program that includes identifying and acquiring blighted, abandoned and vacant land to revitalize neighborhoods. She also oversees and coordinates the City of Barberton demolition program. Mrs. Carr has knowledge of and has assisted with administering the City's CDBG Entitlement grant which includes fiscal oversight, public outreach and program monitoring. Mrs. Carr has also assisted with environmental reviews that are required for CDBG projects throughout the City.

The City of Barberton has worked with the Ohio EPA, Ohio Department of Development, U.S. EPA and Ohio Department of Health in previous grant management efforts for brownfield projects. We have worked with Ohio EPA and U.S. EPA to oversee our activities on the previous grants and have participated in its brownfield initiative since 1999. The City utilizes staff in the engineering, planning, health, parks building and legal departments to carry out grants. The Project Manager (Planning Director) has related experience from four previous U.S. EPA grants in procuring and working with consultants, coordinating site access, and managing the financial aspects of the grant.

#### **Advisory Groups Supporting Grant Implementation**

The City of Barberton has developed many partnerships under its previous grants. These partners have expertise in various disciplines and represent various organizations including civic, environmental, governmental, and private business groups. The City will also seek to partner with local developers and owners of potential brownfield properties, and will continue to involve additional stakeholders as opportunities arise. Public outreach events under the grant will be used to assist in the planning and implementation process.

### **III. WORK SCHEDULE**

#### **Task 1: Engage an Environmental Consultant for Grant Deliverables**

The City has systems in place to hire the expertise necessary to implement the U.S. EPA brownfields funding. The City will issue and advertise a Request for Qualifications (RFQ) for an environmental consultant, evaluate the Qualifications received, and select an environmental consultant to perform the work. The City will contract directly with the environmental consultant. The City will select one consultant to perform all of the work specified under the contractual category for this grant.

All work will be completed under the direction of an Ohio Voluntary Action Program (VAP) Certified Professional. In addition, all work will conform to the standards set forth under the Ohio Voluntary Action Program, unless the Certified Professional determines that only an American Society of Testing and Materials (ASTM) E1527-13 Phase I or ASTM E1903-11 Phase II is required. The assessment of sites with underground storage tanks present will be conducted using the ASTM industry-accepted protocols and will comply with the regulatory standards of the State of Ohio Department of Commerce, Division of the State Fire Marshall, Bureau of Underground Storage Tank Regulations (BUSTR). All sites selected by the City for assessment under the petroleum grant program will be submitted to BUSTR for review and approval before

proceeding with the assessment work. As part of this process, City legal staff will assist in preparing site access agreements, reviewing potential liabilities and aiding with other required legal services pursuant to the grants.

Activities	Deliverables	Responsibility	Completed By
Prepare draft RFQ	Submit draft RFQ for USEPA review	City	30 Days
Revise draft RFQ in accordance with USEPA comments	Provide USEPA with copy of final RFQ for approval	City	30 Days
Advertise RFQ (Public Notice and Send to Interested Parties)	Provide USEPA with copy of published RFQ	City	14 Days
Review and evaluate RFQs, Select Consultant	Notify USEPA about selection	City	30 Days
Contract with Consultant	Contract Document	City	After EPA's CA Award (October 1, 2019)

The City's Project Manager will be responsible for coordinating the selection of a qualified environmental consultant to perform the environmental assessments and other CA support functions. The City will solicit qualified consulting firms through an open, competitive public Request for Qualifications (RFQ). The City will select a firm to retain as the qualified environmental consultant using qualifications-based selection criteria in accordance with City's procurement protocols and applicable federal procurement rules (2 CFR 200.317 through 200.326).

The City will work with its consultant to prepare one QAPP for both the petroleum and hazardous substances grants.

Activities	Deliverables	Responsibility	Completed By
Hold pre-QAPP meeting between consultant and US EPA	Meeting Minutes	City/ Consultant	Within two weeks of bid award
Submit Draft QAPP and prepare draft Health & Safety Plan	Draft QAPP and Health and Safety Plan forwarded to US EPA	City	30 days from Pre-QAPP meeting
Submit Final QAPP and Health and Safety Plan	Final QAPP and Health and Safety Plan forwarded to US EPA	City	15 days after comments received from EPA

## Task 2: Phase I Environmental Site Assessments

It is estimated that, based on the prioritization of sites and site conditions, sizes and accessibility, the Consultant will conduct from four to six Phase I Environmental Site Assessments (ESA) under each grant on selected properties. Phase I ESAs will be prepared in compliance with the All Appropriate Inquiries Final Rule (70FR66070), and a minimum of ASTM E1527-13 or equivalent. Prior to initiating any Phase I ESA, the City will confirm site eligibility determination through written response from U.S. EPA or BUSTR.

These assessments may involve necessary activities including, but not limited to: title searches, environmental database searches, a site reconnaissance, interviews, historical database searches, property appraisals, detailed surveys, and increased code enforcement activities.

All Petroleum Environmental Assessments involving underground storage tanks will be conducted using American Society of Testing and Materials (ASTM) industry accepted protocol, meet or exceed the ASTM E1527-13 standard, and adhere to the regulatory standards of the State of Ohio's Department of Commerce, Division of State Fire Marshall and Bureau of Underground Storage Tank Regulation (BUSTR).

Activities	Deliverables	Responsibility	Completed By
Send EPA Project Manager and/or BUSTR Manager Information about Properties as they are selected for Property Specific Eligibility Determination.	Completed Property Specific Eligibility Determination targeted for Phase I or II work	City/ Consultant	Ongoing
Conduct Phase I Assessments	Completed Phase I Assessments	City/ Consultant	Ongoing
Enter property profile information into ACRES Program	Enter appropriate data	City	After Phase I ESA is complete

### Task 3: Conduct Sampling Plans and Phase II Environmental Site Assessments

The City's selected environmental consultant will conduct up to seven Site Sampling and Analysis Plans and Ohio Voluntary Action Program and or ASTM E1903-11 compliant Phase II Environmental Assessments. Prior to initiating any Phase II ESA, the City will confirm site eligibility determination through written response from U.S. EPA or Ohio BUSTR.

Phase II site assessments may include, but are not limited to, magnetometer surveys, trenching to confirm anomalies, soil and groundwater sampling, soil gas sampling, and vapor intrusion sampling. Phase II Assessments for petroleum may also include physical tank removal and other physical work as required in such an assessment. The City understands that securing additional funding for assessments may be necessary based on the amount of properties desired to be assessed and the budget available.

The consultant will be responsible for providing the U.S. EPA with the Sampling and Analysis Plans (SAP) and Health and Safety Plans (HASP) prior to beginning work. All work will be completed in compliance with Ohio EPA VAP, BUSTR Tier 1 and Tier 2, and ASTM evaluation standards.

Activities	Deliverables	Responsibility	Completed By
Determine Site eligibility through USEPA or BUSTR	Submit Eligibility Determination Form to USEPA or BUSTR	City/ Consultant	Ongoing
Prepare Field Sampling Plan	Submit to USEPA for approval at each site	City/ Consultant	Ongoing
Conduct Phase II field work		Consultant	Ongoing
Prepare Phase II Report	Phase II Report finalized	City/ Consultant	Ongoing
Phase II Completed	Submit copy of completed Phase II to USEPA with quarterly reports	City	Ongoing

Enter property profile information into ACRES Program	Enter appropriate data	City	After Phase II field work is complete
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#### Task 4: Remedial Planning and Design

The City and its consultant will author up to seven total Remedial Action Project Plans (RAPs) and/or Risk Assessments for its petroleum and hazardous substance grants. The RAPs will be submitted to Ohio EPA and U.S. EPA for approval. The RAPs and Risk Assessments may be used to help secure future cleanup funding, including U.S. EPA, Jobs Ohio, or other funds. The use of U.S. EPA and/or Ohio EPA Field Support Services for brownfields, such as magnetics, ground penetrating radar and electromagnetics, will be utilized as much as possible to minimize unnecessary expenditures.

Activities	Deliverables	Responsibility	Completed By
Conduct remedial planning for sites with completed Phase II assessments	Submit remedial plan to US EPA for review	Consultant	Ongoing
Apply for Jobs Ohio Revitalization Fund	Grant Application	City/Consultant	Ongoing

#### Task 5: Community Outreach, Programmatic Expenses and Travel

The City intends to conduct public meetings at major project milestones, including: 1) a kick-off meeting at the inception of the project; 2) the completion of Phase I activities; 3) the completion of Phase II activities; and 4) during reuse planning and the development of remedial plans to be used in Ohio Voluntary Action Program. Notice of these meetings will be provided in the local newspapers and on the City website. In addition, the public will be encouraged to participate by submitting comments or questions to the City. Comments received will be discussed openly in public meetings.

To communicate project updates and status to residents, information will be provided through the local newspaper (The Barberton Herald); local radio stations; the City website; posted or provided in municipal buildings; and materials and presentations provided by Brownfield Advisory Committee members to their specific organizations. Specific stakeholders, such as residents adjacent to a targeted site, will also receive information via direct mail or phone. City representatives will also make presentations at City meetings to describe the assessment grant process and address the concerns of local residents and business owners.

In addition to public education and outreach tasks, this task also includes an educational component for City staff to attend brownfields-related conferences and learn more about the latest developments in brownfields redevelopment at the state and local level.

Activities	Deliverables	Responsibility	Completed By
Kick-Off Public Meeting to discuss grant	Determine date and copy of presentation	City/Consultant	Prior to City Signing Cooperative Agreement
Determine communication needs on a site-by-site basis	Determined on a site-by-site basis	City	Ongoing

Post Phase II activity	Inform community of results of Phase II study if necessary. Communicate results through meetings, mailings, internet, etc. Provide documentation to U.S. EPA	City/ Consultant	Ongoing
Enter property profile information into ACRES Program	Enter appropriate data	City	Quarterly
Attend Ohio and National Brownfield Conferences	None	City	As applicable

**Task 6: Quarterly Reporting, Disadvantaged Business Enterprise (DBE) Reporting and Annual Financial Reporting to U.S. EPA**

The City will submit four (4) quarterly reports per the Federal fiscal year to the assigned EPA Project Officer. Quarterly Reports are due thirty (30) days after the end of the quarter. The Quarterly Report will include a cover letter, a title information page, an update on the program processes and activities for the quarter, updates of site prioritization (if applicable), a schedule summary, and a budget summary. The City will also submit Disadvantaged Business Enterprise (DBE) Reports and Federal Financial Reports as required. All Phase I and Phase II assessments finalized during the quarter will be submitted to USEPA either on CD or other electronic method at the time the Quarterly report is submitted.

Activities	Deliverables	Responsibility	Completed By
Prepare Quarterly Reports and enter property profile information into ACRES Program	Quarterly Report submitted to US EPA Project Officer.  Data entered into ACRES	City	30 days from end of Federal Fiscal Quarter: January 30, April 30, July 30, & October 30
Submittal of all Phase I and Phase II assessments	CD-ROM or other electronic method	City	Submitted with Quarterly Reports (will include all Phase I and Phase II assessments finalized during the preceding quarter)
Annual Federal Financial Report (SF-425)	One year from Cooperative Agreement start date	City	Annually
Disadvantaged Business Enterprise Reports		City	Annually

**IV. BUDGET**

The bulk of the grant dollars will be spent on Phase I and Phase II assessments to address hazardous substances or petroleum substances and to complete remedial planning and design. This may include legal services to prepare site access agreements, review potential liabilities, and other required legal services pursuant to the grant.

Budget Categories	Task 1 Programmatic Costs	Task 2 Community Outreach	Task 3 Phase I and II Assessments	Task 4 Cleanup and Reuse Planning	Total
<b>Hazardous Substances Assessment Grant</b>					
Personnel	4,500				4,500
Fringe Benefits					0
Travel	2,500				2,500
Equipment					0
Supplies		500			500
Contractual			88,500	54,000	142,500
Other					0
Subtotal	7,000	500	88,500	54,000	150,000
<b>Petroleum Assessment Grant</b>					
Personnel	4,500				4,500
Fringe Benefits					0
Travel	2,500				2,500
Equipment					0
Supplies		500			500
Contractual			96,500	46,000	142,500
Other					0
Subtotal	7,000	500	96,500	46,000	150,000
<b>Grand Total</b>	<b>14,000</b>	<b>1,000</b>	<b>185,000</b>	<b>100,000</b>	<b>300,000</b>

**Task 1 - Programmatic Costs:** Programmatic costs are included for two staff to attend two EPA Brownfields Conferences and one other brownfields training program (\$1,250 per person, per trip). Costs of \$4,500 (125 hours at an average hourly rate of \$36/hour) are allocated from each budget for staff from the City to support the grant with eligible programmatic management needs such as hiring a consultant, site selection, communicating with public and private owners, and progress and financial reporting. Outputs will include ACRES updates, quarterly and annual reports, continuing staff training, and improved knowledge of both petroleum- and hazardous substances-contaminated brownfields.

**Task 2 - Community Outreach:** Community outreach costs of approximately \$500 from each grant (\$1,000 total) will include supplies for conducting community outreach programs/meetings, drafting press releases, and updating the City website. Outputs include up to four community meetings per year, development of marketing documents, and addition of up to 10 eligible properties to the City's brownfields site inventory.

**Task 3 - Phase I and II Site Assessments:** Sites will be evaluated through performance of Phase I and/or II ESAs conducted in accordance with All Appropriate Inquiries, ASTM E1527-13 and E1903-11 standards, and the Ohio VAP. The costs for completing Phase I and Phase II ESAs will vary depending on the complexity and whether VAP compliance is required. Based on prior brownfield experience, the City estimates Phase I ESAs will cost \$3,000 to \$6,000, and Phase II ESAs will cost \$18,000 to \$25,000. The hazardous substances budget includes contractual costs of \$88,500 based on conducting six Phase I ESAs at an average cost of \$4,500 (\$27,000 total) and three Phase II ESAs at an average cost of \$20,500 each (\$61,500 total). The petroleum budget includes contractual costs of \$96,500 based on four Phase I ESAs at an average cost of \$3,875 (\$15,500 total) and four Phase II ESAs at an average cost of \$20,250 (\$81,000 total). Outputs include completion of up to 10 Phase I and 7 Phase II ESAs.

**Task 4 - Cleanup Planning:** The City will conduct cleanup/redevelopment planning in accordance with the Ohio EPA VAP or Bureau of Underground Storage Tank Regulations (BUSTR) programs, or U.S. EPA Analysis of Brownfields Cleanup Alternatives (ABCA). This may include preparation of cleanup plans, assessment of cleanup/redevelopment alternatives, and evaluation of institutional and engineering controls. Because our target petroleum sites are expected to be smaller and less complex than our target industrial properties, contractual costs for this task are estimated at three hazardous substances plans at an average cost of \$18,000 per plan (\$54,000 total), and four petroleum plans at an average cost of \$11,500 per plan (\$46,000 total). Outputs include up to seven ABCA/RAPs for the seven sites at which Phase II ESAs will be performed.

*(See next page for a table of Project Outputs and Outcomes.)*

**Project Outputs and Outcomes:**

<b>Hazardous Substances Assessment Grant Environmental Results Table</b>					
<b>Stated Objective/ Link to EPA Strategic Plan</b>	<b>Grant Funding</b>	<b>Work Plan Activities &amp; Timeframe for Accomplishment (Commitments)</b>	<b>Results of Activities (outputs)</b>	<b>Projected Environmental Improvement (outcome)</b>	<b>Established Baseline for Measurement</b>
<p>Assessment Grant Section 104(k)</p> <p>Goal 3 Cleaning Up Communities</p> <p>Objective 3.1 Promote Sustainable and Livable Communities</p>	\$150,000 Hazardous Substance	<p>Within grant period, City will review our inventory of brownfields, assess up to 6 properties with suspected contamination and prepare a Remedial Action Plan for up to 3 properties by the end of the grant period (assumed to be July 2022).</p>	<p>Up to 6 Phase I Assessment Reports</p> <p>Up to 3 Phase II Assessment Reports</p> <p>Up to 3 Remedial Action Plan Reports</p> <p>Up to 6 Property Profile Forms (updated periodically); QAPP, HASP, Site-Specific Sampling Plan(s)</p> <p>Conduct up to 4 public meetings</p>	<p>Up to 6 properties assessed and up to 3 remedial action plans developed</p> <p>Up to 10 acres assessed</p> <p>Up to 4 jobs created</p> <p>Up to \$1,000,000 cleanup/ redevelopment funds leveraged</p> <p>Informed community on brownfields issues</p>	<p>Up to 6 assessments completed</p> <p>Up to 10 acres assessed</p> <p>Up to 4 jobs created</p> <p>\$1,000,000 in cleanup/ redevelopment funds leveraged</p>
<b>Petroleum Assessment Grant Environmental Results Table</b>					
<b>Stated Objective/ Link to EPA Strategic Plan</b>	<b>Grant Funding</b>	<b>Work Plan Activities &amp; Timeframe for Accomplishment (Commitments)</b>	<b>Results of Activities (outputs)</b>	<b>Projected Environmental Improvement (outcome)</b>	<b>Established Baseline for Measurement</b>
<p>Assessment Grant Section 104(k)</p> <p>Goal 3 Cleaning Up Communities</p> <p>Objective 3.1 Promote Sustainable and Livable Communities</p>	\$150,000 Petroleum	<p>Within grant period, City will review our inventory of brownfields, assess up to 4 properties with suspected contamination and prepare a Remedial Action Plan for up to 4 properties by the end of the grant period (assumed to be July 2022).</p>	<p>Up to 4 Phase I Assessment Reports</p> <p>Up to 4 Phase II Assessment Reports</p> <p>Up to 4 Remedial Action Plan Reports</p> <p>Up to 4 Property Profile Forms (updated periodically); QAPP, HASP, Site-Specific Sampling Plan(s)</p> <p>Conduct up to 4 public meetings</p>	<p>Up to 4 properties assessed and up to 4 remedial action plans developed</p> <p>Up to 10 acres assessed</p> <p>Up to 4 jobs created</p> <p>Up to \$1,000,000 cleanup/ redevelopment funds leveraged</p> <p>Informed community on brownfields issues</p>	<p>Up to 4 assessments completed</p> <p>Up to 10 acres assessed</p> <p>Up to 4 jobs created</p> <p>\$1,000,000 in cleanup/ redevelopment funds leveraged</p>