

# Competitive Brownfields Cleanup Grant

## Threshold Criteria & Narrative Tips



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\*Presentation given using information from the FY26 competition. Guidelines are subject to change



# Before you Begin...

**Active account on SAM.gov:** Provides your organization with a Unique Entity Identifier (UEI)

- Registration can take weeks
- [Register here](#)

**Active account on Grants.gov:** Full application will be submitted here

- Applying requires a UEI
- [Register here](#)



# Components of a Cleanup Application

- **Application Information Sheet**

- Summarize the applicant details and site

- ★ ■ **Threshold Criteria**

- Determine the eligibility of the proposed project, the site, and the applicant

- **Programmatic Criteria**

- Evaluate the applicant's ability to manage the proposed project

- ★ ■ **Narrative Criteria**

- Evaluate the proposed project, described in detail



& EPA Mandatory Forms... but we won't talk about that today 😊



# Threshold Criteria for Cleanup Grants



**\*Community Notification  
must be complete 14 days prior  
to application submittal**

<b>1.</b>	Applicant Eligibility
<b>2.</b>	Previously Awarded Cleanup Grants
<b>3.</b>	Expenditure of Existing Multipurpose Grant Funds
<b>4.-7.</b>	Site Ownership, Information, Status/History, and Site Definition
<b>8.-9.</b>	Environmental Assessments and Site Characterization
<b>10.</b>	Enforcement or Other Actions
<b>11.</b>	Property-specific Determination
<b>12.</b>	Criteria Related to CERCLA/Petroleum Liability
<b>13.</b>	Cleanup Authority and Oversight Structure
<b>14.</b>	Community Notification*
<b>15.</b>	Contractors and Named Subrecipients

# (1) Applicant Eligibility

- “**Indicate** your applicant type and demonstrate how you are an eligible entity (complete list in Section 2.A.).”
  - “For entities that are cities, counties, Tribes, or states, **affirm** that the organization is eligible for funding.”
  - \*Intertribal Consortia are eligible for funding with additional documentation. See NOFO for details



## (2) Previously Awarded 104k Cleanup Grants

- **“Affirm** that the proposed site(s) has not received funding from a previously awarded EPA Brownfields Cleanup Grant.”
  - States & Tribes may apply for a Cleanup Grant for a site on which they have used CERCLA 128(a) funds. *However, the proposed Cleanup Grant must cover different costs than those under the 128(a) grant.*
  - Get creative with how you define your “site”
    - *Designate by parcel no.*



# (3) Expenditure of Multipurpose Grants

- **“Indicate** if the applicant has an open EPA Brownfields Multipurpose Grant.”
  - If so, demonstrate that at least 70% of each multipurpose grant has been drawn down from EPA and dispersed to eligible activities/sources by [October 1, 2025.]
  - Attach a copy of a financial record (i.e., ASAP report) to show the amount of funds drawn down and the corresponding dates



## (4) Site Ownership

- “**Identify** the current owner of the site (if you are not the current owner, **identify** the date you plan to acquire ownership of the site).”
- ***Cleanup applicants must own the site(s) by the application deadline!***
  - *Fee simple title through a legal document (recorded deed)*
  - *Alternate ownership agreement that has been pre-approved by EPA*
  - *Option to discuss site ownership with EPA before applying*

★ *If you are applying for multiple sites, Threshold Criteria 4-13 must be addressed for each site.*



# Site Ownership/Liability FAQs

Do Tribes “own” Tribal trust lands for purposes of Brownfields Cleanup Grants and RLF remediation subgrants?

Generally, EPA believes Tribes have a sufficient ownership interest in Tribal trust lands to “own” such lands for purposes of Brownfields Cleanup Grants and RLF remediation subgrants.

Are Tribes considered “potentially responsible parties” (PRPs)?

EPA has not considered Tribes to be liable as PRPs under CERCLA. Tribes are exempt from demonstrating that they meet the requirements of a CERCLA liability defense and therefore not subject to the prohibition of using Brownfield grant funds to pay for response costs at a site for which they are potentially liable under CERCLA Sec. 107.



## (5) Basic Site Information

- “Identify the name and address of the site, including zip code.”
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## (6) Status and History of Site Contamination

- “Identify:
  - A) Whether the site is contaminated by hazardous substances or petroleum;
  - B) The operational history of the site and current use(s) of the site;
  - C) Environmental concerns, if known;
  - D) How the site became contaminated and, if possible, describe the nature and extent of contamination.”



# (7) Brownfield Site Definition

- “**Affirm** that the site is not (all three must apply):
  - A) Listed or proposed for listing on the National Priorities List
  - B) Subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued or entered into by parties under CERCLA;
  - C) Subject to the jurisdiction, custody, or control of the U.S. government.”
    - *Land held in trust by the U.S. government for an Indian Tribe is eligible for funding*



# (8) Environmental Assessment Required for Cleanup Grant Applications

- “**Describe** the type of environmental assessments conducted at your proposed site (do not attach assessment reports). **Provide** the date of the Phase II or equivalent report.”
  - A written ASTM E1903-19 (or equivalent Phase II report) must be complete before submitting your application
  - A draft Phase II report is acceptable
  - *Equivalent examples: Asbestos surveys, lead paint surveys, physical/safety hazard assessment, etc.*



# (9) Site Characterization: Tribal Authority

- “**Include** a statement affirming that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site(s).”
- “If additional assessment is needed to sufficiently characterize the site(s) for the remediation work to begin, **include** a statement to that effect. **Affirm** that there will be a sufficient level of characterization from the environmental site assessment performed by [June 15, 2026].”



# (10) Enforcement or Other Actions

- “**Affirm** there are no known ongoing or anticipated environmental enforcement or other actions related to the site.”
- “**Identify** known ongoing or anticipated environmental enforcement or other actions related to the site. **Provide** information on any inquiries or orders from federal, State, or local government entities that the applicant is aware of...”



# (11) Property-Specific Determinations

- 1) Subject to planned/ongoing removal actions under CERCLA
- 2) Issued/entered into unilateral administrative order, court order, etc. under RCRA, FWPCA, TSCA, SDWA
- 3) Subject to RCRA corrective action with a corrective action permit or order
- 4) Land disposal units that have submitted a RCRA closure notification or subject to closure requirements
- 5) Release of PCBs and subject to TSCA remediation
- 6) Receiving \$ from a LUST Trust Fund



*If your site(s) requires a Property-Specific Determination, attach the information requested on pg. 58 FY26 FAQs*



# (12) CERCLA Liability: Tribes & Cleanup Grant

- Hazardous Substances: “EPA does not consider Indian Tribes to be liable under CERCLA and, therefore, Tribes are exempt from demonstrating that they meet the requirements of a CERCLA liability defense to be eligible for a Brownfields Grant. Affirm the applicant is an Indian Tribe and is therefore exempt from demonstrating that they meet the requirements of a CERCLA liability defense.”



## (12) CERCLA Liability: Tribes (cont.)

- Petroleum: “**Submit** the information required for a petroleum site eligibility determination as an attachment. EPA will make the petroleum site eligibility determinations for Tribes.”
  - *Demonstrate there is no viable responsible party, applicant is not liable, and site is not subject to RCRA corrective action order.*
- Hazardous Building Materials: “**Affirm** there has been no release and there is no threat of release of the hazardous substance(s) from building materials into the outdoor environment based on the site conditions.”



# (12) Site Eligibility/Liability FAQs

What if EPA determines that my site is only partially eligible?

EPA can provide partial funding for the portion of the site that is determined eligible. The eligible portion of the site will be forwarded for Programmatic and Narrative review, and EPA will notify the applicant which portion is ineligible for funding. Applicants may not substitute sites if EPA determines a site is not eligible.

How does EPA consider eligibility for a site that requires a property-specific determination?

EPA considers eligibility for these sites by considering whether the project will protect human health and the environment and a) promote economic development; or b) facilitate the creation of greenspace, parks, etc. Include the information listed on page 28 of the FAQs.



# (13) Cleanup Authority and Oversight

- “**Describe** how you will ensure adequate oversight of the cleanup at the site(s).”
- “**Indicate** whether you plan to enroll in a State or Tribal response program.”
  - “Or **describe** how you will provide or acquire the necessary technical expertise to conduct and oversee the cleanup.”
- **Provide** a plan to acquire access to neighboring properties, if necessary for cleanup activities.



# (14) Community Notification: ABCA

- “Applicants must allow the community the opportunity to comment on the draft application, which must include an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA).”
  - *Site and contamination issues, cleanup standards applicable laws*
  - *Detailed description of all cleanup alternatives considered*
  - *Proposed cleanup plans*
- **Attach** ABCA to your application. For applications requesting funding for multiple sites, include a draft ABCA for each site.



*Attend the presentation “How to Manage a Cleanup” for more information on ABCAs*



# (14) Community Notification: Public Notice

- **Publish** a community notification ad (or equivalent) about the intent to apply for funding and include notice of a public meeting **no later than 14 days** before the application is **submitted** to EPA.”
  - *Date, time, location of public meeting*
  - *Where the draft application AND draft ABCA are located for public review*
  - *How the public can submit comments*
- **Attach** a copy to your application and include proof of the date it was published



# (14) Community Notification FAQs

examples of “equivalent” notice to an ad in the local newspaper include:

- posting information on a website;
- listserv blast;
- mass mailer;
- television or radio broadcast;
- social media;
- mass message via telephone notification;
- placing an ad on a community bulletin board; and
- notifying affected residents door-to-door.



# (14) Community Notification: Public Meeting

- **“Hold a public meeting to discuss the draft application and consider public comments prior to submitting application.”**
- Applicant must **attach**:
  - *Comments/summary of public comments received*
  - *Applicant’s response to comments*
  - *Meeting notes/summary of public meetings*
  - *Meeting sign-in list*
- Meeting must be held prior to submitting application to EPA



# (14) Community Notification (cont.)

- **Attach:**
  - Draft ABCA(s)
  - Community notification ad (or equivalent)
    - *Proof it was published at least 14 days before submittal*
  - List or summary of public comments
  - Response to public comments
  - Meeting notes or meeting summary
  - Meeting sign-in sheet or participant list

If one or more of the requested attachments are not submitted with the application, explain why it is not included or unavailable.



# (14) Community Notification FAQs

- Are the costs of Community Notification allowable under Cleanup Grants?

No. EPA will not approve pre-award costs for Community Notification due to the limited amount of funding for actual site cleanup work. As a matter of fairness, EPA will not reimburse the selected applicants because it cannot also reimburse unsuccessful applicants for Community Notification.



# (15) Contractors and Subrecipients

- Contractors: “**Disclose** whether applicants have already selected a contractor for the proposed project and the procurement procedures that were followed.”
  - *Tribal entities must follow the policies and procedures they use for procurements with non-federal funds. If such policies and procedures do not exist, they must follow the federal procurement standards at 2 CFR §§ 200.318 - 200.327.*
- Subrecipients: “**Describe** how the named subrecipient is eligible for a subaward.”

State “n/a” if a contractor nor subrecipient has been selected



# Narrative Tips for Cleanup Grants

- Read the entire Guidelines for the grant type for which you're applying.
- Write as though the reader knows **NOTHING** about your community.
- Avoid using acronyms and technical/organizational jargon.
- Respond to the criterion where asked
- Number pages and enumerate/identify the criterion.
- **Address ALL criteria. If a criterion, or part of a criterion, doesn't apply, state that and explain why.**
- The **quality** of the response is extremely important (see Review Criteria in Section 6.B.).



# Narrative Tip: "... the response may only earn..."

## **2.a. The Community's Need for Funding (5 points)**

The extent to which this grant will meet the needs of the community(ies) (i.e., the city(ies), town(s), or geographic area(s) targeted in this application) that have an inability to draw on other sources of funding to carry out environmental assessment or remediation, and subsequent reuse in the target area(s) because the community has a small population and/or is low-income. (Note, if the inability to draw on other sources of funding is not because the community has a small population or is low-income, then the response may only earn up to 2 points.)

*FY26 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS; 6.B Review Criteria*

## **2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 points)**

The extent to which this grant and reuse strategy/projected site reuse(s) will address, or help identify and reduce, threats to populations in the target area(s) with a greater-than-normal incidence of diseases or conditions (including cancer, asthma, or birth defects) that may be associated with exposure to hazardous substances, pollutants, contaminants, or petroleum. (Note, if populations in the target area(s) do not suffer from a greater-than-normal incidence of cancer, asthma, or birth defects, then the response may only earn up to 2 points.)

*FY26 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS; 6.B Review Criteria*



# Narrative Tip: “The extent to which...”

## **2.d. Economically Impoverished/Disproportionately Impacted Populations (5 points)**

The degree to which populations in the target area(s) are economically impoverished and/or disproportionately share the negative environmental consequences resulting from industrial, governmental, and/or commercial operations or policies. **The extent to which this grant and reuse strategy/projected site reuse(s) will address these issues and/or help identify and reduce related threats.**

*FY26 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS; 6.B Review Criteria*

## **1.a. Overview of Brownfield Challenges and Description of Target Area (5 points)**

The extent to which the brownfield challenges are clearly discussed and the degree to which these challenges impact the city(ies), town(s), or geographic area(s) targeted by this application. **The extent to which this grant may help address these challenges and impacts.**

*FY26 GUIDELINES FOR BROWNFIELD CLEANUP GRANTS; 6.B Review Criteria*



# Narrative Tip: Repeat Yourself

*Even if you feel like you've addressed the criteria in another section, repeat yourself anyway*

The extent to which this grant will meet the needs of the community(ies)

The extent to which the brownfield challenges are clearly discussed and the degree to which these challenges impact the city(ies), town(s), or geographic area(s) targeted by this application.

The extent to which this grant and reuse strategy/projected site reuse(s) will address these issues

The extent to which this grant and reuse strategy/projected site reuse(s) will address, or help identify and reduce, threats to populations



# Narrative Tip: Include Data

## Community Need

Applicants are encouraged to include data in the Narrative to help characterize and describe the target area(s) and their community(ies). Data can come from geospatial mapping tools and other sources (e.g., studies, census, and third-party reports).

*FY26 Guideline Outreach Presentation*

**C.13.** For the purposes of the Community Need criterion for Brownfield Grants, what are examples of health, welfare, environmental, and other demographic information I could provide about my community? Where do I find demographic information about my community?

*FY26 FAQs*



# Narrative Tips: Tasks, Costs, & Measuring Progress

- **Proposed Cleanup Plan:**
  - Ensure that sufficient details from the ABCA are included in the narrative. Reviewers cannot use the ABCA for scoring purposes
  - Ensure activities are sufficiently quantified (cubic yards or soil to be removed, cubic yards of backfill needed)
- **Anticipated Project Schedule:** Include sufficient detail in the timeline to demonstrate feasibility to complete in the project period
- **Project Implementation:** Ensure all major milestones are included\*

*Attend the presentation “How to Manage a Cleanup” for more information on major milestones*



# Narrative Tips: Cleanup Cost Estimates

## f. Cost Estimates

Describe how cost estimates for each task were developed per budget category, including direct and indirect administrative costs (if applicable). Present costs per unit where appropriate. *(Note, the total amount of direct and indirect administrative costs cannot exceed 5% of the total EPA-requested funds.)*

- Ensure all costs are sufficiently itemized and quantified (costs per unit, cost per cubic yards of soil to be removed, hourly rate for staff/QEP)
- Explain where the numbers came from (e.g. QEP provided estimate, provided in phase II)
- Ensure what is described in the cleanup plan is also included in the budget



# Cleanup Cost Estimate Example

- **Prog. Mgmt/Personnel: \$24,000** - 480 hrs. Planner/Finance avg rate - \$50/hr (per quarter est: 10-hrs EPA reporting/records management, 10-hrs. Monthly progress meetings, and 20-hrs site-specific and community engagement work). Additional hours required will not be charged to the grant.
- **Travel:** 2 people to attend National Brownfield Conference: **\$3,600** (per person: \$500 airfare, 4 nights hotel \$800, 4 days per diem and incidentals \$500)
- **Site-Specific Cleanup Planning:** \$10,000 (finalize ABCA \$1,000; prepare Remedial Action Plan \$5,000; stormwater management design plans \$3,000; State fee for entering VCP \$1,000)
- **Remediation Contractor (i.e., belongs on Construction line in budget): \$479,800** (excavate/transport/disposal [\$404,600 = 1,700 tons @ ~\$238/ton avg]; dust/erosion controls [\$16,100]; air monitoring [\$21,000]; temporary fencing [\$1,600]; decontamination [\$13,000]; clean backfill [\$23,500 = 855cy x \$27.50/cy]).
- **Direct and Indirect Administrative Costs (not to exceed 5% total grant award):** \$4,200 (30 hrs Project Manager @\$50/hr for Subaward and Executive Compensation Reporting and preparation of amendments such as no-cost time extensions; 45 hrs Planner/Finance avg rate of \$60/hr for preparing ASAP payment requests and annual and final federal financial reports [SF 425's]).



# Resources

- [Kansas State University Technical Assistance to Brownfields/Tribal TAB](#)
- [Multipurpose, Assessment, RLF, and Cleanup \(MARC\) Grant Application Resources](#)
- [EPA's Office of Brownfields and Land Revitalization ListServ](#)
- [EPA Region 5 Brownfields ListServ](#)



# Call Us With Your Threshold Questions!

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