



**Executive Department**

**Joshua Reny  
Assistant City Manager**

**Narrative Information Sheet  
EPA FY2022 Brownfields Community-Wide Assessment Grant Application  
City of South Portland, Maine**

1. Applicant Identification: City of South Portland, Maine  
25 Cottage Road  
South Portland, Maine 04106
2. Funding Requested
  - a. Assessment Grant Type: Community-Wide
  - b. Federal Funds Requested
    - i. Amount Requested: \$500,000
    - ii. Site-Specific Assessment Grant Waiver: Not Applicable
3. Location
  - a. City: South Portland
  - b. County: Cumberland County
  - c. State: Maine
4. Target Area and Priority Site/Property Information (Community-Wide Assessment Grant Application)
  - a. Target Area(s): Fore River Waterfront & Main Street Corridor
  - b. Census Tract Number: Maine Census Tract 31, 32 and 35 (Fore River Waterfront) and Maine Census Tract 30.01 and 33 (Main Street Corridor)
  - c. Address of Priority Site(s): Liberty Shipyard at 110/120 Breakwater Annex and 149/159 Front Street (Fore River Waterfront Target Area) and the Rigby Auto Site at 205 Lincoln Street (Main Street Corridor Target Area)
5. Contacts:
  - a. Project Director: Joshua Reny, Assistant City Manager, 25 Cottage Road, South Portland, Maine 04106; 207-767-7606; 207-767-7629 (fax); jreny@southportland.org
  - b. Chief Executive/Highest Ranking Official: Scott Morelli, City Manager, 25 Cottage Road, South Portland, Maine 04106; 207-767-3201; 207-767-7629 (fax); smorelli@southportland.org
6. Population: The City of South Portland has a population of 26,498 (2020 Decennial Census).

7. Other Factors:

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The priority site(s) is impacted by mine-scarred land.	N/A
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1, 2
The priority site(s) is in a federally designated flood plain.	N/A
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.	N/A
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	N/A

8. Letter from State or Tribal Environmental Authority: Attached

9. Releasing Copies of Applications: Not Applicable - No portions of this application are confidential, privileged or sensitive.

# **Narrative Information Sheet Attachment**

**Letter from State or Tribal Authority  
Maine Department of Environmental Protection**

**City of South Portland, Maine  
EPA FY2022 Brownfields Assessment Grant Proposal**



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM  
COMMISSIONER

November 17, 2021

Ms. Dorrie Paar  
EPA Region 1  
5 Post Office Square  
Suite 100, Mailcode: OSRR7-2  
Boston, Massachusetts 02109-3912

Dear Ms. Paar:

The Maine Department of Environmental Protection's ("Department") Bureau of Remediation and Waste Management acknowledges that the City of South Portland plans to conduct site assessments and is applying for federal Brownfields grant funds.

Josh Reny of the City of South Portland has developed an application requesting federal Brownfields Site Assessment Grant funding to assess Brownfields sites in the city.

If the city receives funding, the Department will assign project management staff to conduct eligibility determinations and provide review and comment on all assessments, workplans, Quality Assurance Plans, and Health and Safety Plans. For sites where cleanup is pursued, the Department's Voluntary Response Action Program ("VRAP") staff will provide review and comment on investigation reports and remedial workplans, and will provide oversight (as necessary) of contractor's work at the properties. Upon successful completion of remedial activities at a property, the VRAP will provide protections from Department enforcement actions by issuing a Commissioner's Certificate of Completion.

Please feel free to call me directly at (207) 592-0882 should you have any questions regarding this letter.

Sincerely,

Nicholas J. Hodgkins  
Voluntary Response Action Program  
Division of Remediation  
Maine Department of Environmental Protection

Pc: Josh Reny, City of South Portland

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826

BANGOR  
106 HOGAN ROAD, SUITE 6  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769  
(207) 764-0477 FAX: (207) 760-3143

# **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

## **a. Target Area and Brownfields**

### **i. Background and Description of Target Area**

The City of South Portland was incorporated in 1898 and is Maine's fourth largest City with a population of 26,498 (2020 Decennial Census). Due to our City's history as a working-class community and its proximity to air, marine, rail, and highway transportation, it has been a center for industry for nearly 200 years. In the late 1700's, shipyards and trade ports were developed along the Fore River, and during the 1800's and early 1900's, industrial and commercial development expanded across South Portland spurred by the construction of Rigby Rail Yard, which at the time was the largest rail yard in New England. During World War II, the U.S. Government financed mass development along the Fore River waterfront to facilitate construction of large shipbuilding complexes that manufactured the famed "Liberty Ships". More than 10% of all Liberty Ships were built in the City, and at its peak, the shipyard employed over 30,000 people<sup>1</sup>. Thousands of housing units were built for workers and their families. South Portland's contribution to the war effort did not end with ships, and due to its deep-water berthing, became the northernmost and largest-volume oil ports on the Eastern Seaboard. The Portland-Montreal Pipeline was constructed in the 1940's and since then, has pumped over 5 billion barrels of oil to Canadian refineries. During this time, 120 large bulk oil storage tanks were constructed throughout the City.

The City's industrial prominence proved fleeting. The end of World War II triggered closure of the Liberty Shipyard, the loss of thousands of jobs, and left the City with unused industrial and shipbuilding facilities, empty storefronts, and hundreds of vacant houses. These Brownfield Sites, combined with their legacy of contamination, left our waterfront and nearby residential neighborhoods in a state of blighted, contaminated disrepair. The **Fore River Waterfront** is the core of this historic working waterfront of shipbuilding, boatyards, and petroleum facilities, and is one of two Target Areas for this Brownfield Assessment Program. This was also the Target Area for the City's FY2019 Brownfield Assessment Grant and includes the 30-acre former Liberty Shipyard site, 39 bulk oil storage tanks, portions of the Portland Pipeline, a dilapidated housing stock, and 35 "Priority Petroleum/Brownfield Sites" as identified in our previously completed Target Area Inventory. This area is located north of Broadway, and includes the neighborhoods of Cushing's Point, Ferry Village (the oldest neighborhood in the City), Knightville, and portions of Pleasantdale and Ligonias (Census Tracts 31, 32 and 35).

Our FY2019 Brownfield Assessment Program identified a substantial need for environmentally-responsible redevelopment and revitalization in the Fore River Waterfront Target Area. However, based on input from the public and changing socio-economic conditions caused by the COVID-19 pandemic, and an influx of immigrants and refugees to our City, we can't ignore the environmental justice issues that have become prevalent in the vicinity of Main Street and the Rigby Railyard, the industrial sector of our City where many low-to-moderate income and "new Americans" reside. The **Main Street Corridor will be the second Target Area for our Brownfield Program**. This target area covers the area between Main Street and the Boston and Maine Railroad, from the Maine Street Interstate 95 interchange to the Fore River. This area includes the 200-acre Rigby Railyard (highlighted in a 2009 article entitled "That's My Dump"<sup>2</sup>), 72 bulk oil storage tanks with 62.5M gallons of petroleum storage, active and historic gas stations and automotive repair facilities, and dozens of industrial properties covering 220 acres in the center of our City (Census Tracts 30.01 and 33). The nearly 500 acres of current and historic industrial activities in this Target Area have caused such significant environmental contamination from releases of hazardous substances and pavement runoff that Barberry Creek, an Urban Impaired Stream which runs through this target area, is on Maine's 2004 §303(d) list for non-attainment of Class C aquatic life standards, which means that the stream is incapable of supporting the life stages of any indigenous fish.

### **ii. Description of the Priority Brownfield Site(s)**

As part of our FY19 Brownfield Assessment Grant, we identified 35 "Priority Petroleum/Brownfield Sites" during a Petroleum Corridor Inventory completed in the Fore River Waterfront Target Area. These sites were listed in regulatory databases, had historic petroleum use or storage, and/or were identified as having current operations that could potentially cause impacts to the environment. These 35 sites illustrate the need for continued and significant Brownfield investment in the Fore River Waterfront Target Area. The City plans to continue its investment in the assessment and redevelopment of the FY2019 Priority Site, the **Liberty Shipyard** (inclusive of seven separate parcels of land per the ACRES database), located

<sup>1</sup> <https://www.mainememory.net/sitebuilder/site/856/page/1266/display>  
<sup>2</sup> <https://thebollard.com/2009/07/04/thats-my-dump-16/>

off Madison Street in the **Fore River Waterfront Target Area**, by performing ABCA/RAPs and remedial planning. Based on results of Phase II ESAs conducted in our FY2019 program, we know that soils, groundwater, and soil vapor at this 30-acre site is contaminated with petroleum compounds, heavy metals, PCBs, and chlorinated solvents, and that hazardous building materials are present in the four on-site buildings. The owners of this Site have begun redevelopment planning; however, the presence of known environmental contamination is a complicating factor which could be mitigated through ABCA/RAPs with engineering-based remedial strategies and construction cost estimating.

Another Site identified during our FY2019 Brownfield Inventory was the **Rigby Auto Site** located at 205 Lincoln Street in the Ligonía neighborhood of the City; this 1.7-acre property is the “Priority Brownfield Site” in our **Main Street Corridor Target Area**. Rigby Auto is improved with a 12,000 square foot, single story structure with overhead doors that has historically been an auto repair facility. It formerly maintained underground storage tanks containing #2 fuel oil and waste oil UST, and several MEDEP spill reports have been filed for the property documenting gasoline and oil contamination on-Site. The Site is directly on the border between an industrial area of the City characterized by 19 bulk oil storage tanks and a residential neighborhood. The South Portland Housing Authority (SPHA) has expressed interest in acquiring the Site and redeveloping with safe and affordable housing units; this plan has been delayed in part by the historic environmental conditions at the Site. The City intends to use Brownfield funds to assist the SPHA conduct due diligence and cleanup planning in order to convert this contaminated industrial site into much-needed housing for the City’s disadvantaged populations.

## **b. Revitalization of the Target Area**

### **i. Reuse Strategy and Alignment with Revitalization Plans**

Brownfield redevelopment in the Target Areas aligns directly with South Portland’s Comprehensive Plan (amended in 2019) that serves as a guide for growth, development, redevelopment, and change in the City. Our plan was developed by a committee of City residents, who engaged the community and sought feedback throughout the entire process. The Comprehensive Plan is widely regarded as a plan written by, and for the benefit of, the community. Key goals of the plan, as they relate to Brownfield, include creation of additional affordable and diverse housing options; infill residential development; encouraging commercial development along major traffic corridors such as Main Street (with access to public transportation); promoting redevelopment of the Fore River Waterfront/Eastern Waterfront as a mixed-use area; and providing high-quality recreational facilities and open space. The City has also prepared Master Plans for neighborhoods in our Fore River Waterfront Target Area, including Ferry Village, Knightville, and Mill Creek, all of which echo sentiments on sustainable mixed-use development with preservation/improvements of residential neighborhoods and greenspace.

Our Brownfield program and the redevelopment/reuse of Brownfield Sites will revitalize our Target Area and be a catalyst to achieving our community’s vision. The City’s Brownfield Assessment Program has been, and will continue to be, organized such that Site selection is based on potential for achieving community vision. These selection criteria include likelihood of successful redevelopment; potential for affordable residential redevelopment (like our Priority Site, the former Rigby Auto property which has potential to be redeveloped by SPHA); proximity to transportation corridors and public transit, such as our Main Street Corridor Target Area; potential for mixed use redevelopment of waterfront areas (such as the redevelopment of the Liberty Shipyard); revitalization of blighted, contaminated areas of the City, and improving the health and safety and quality of life of at-risk populations living in our Target Areas.

The goals of the Brownfield program are directly in line with the City’s goals to eliminate blighted properties and environmental risks; support new mixed use development that protects the history and character of our neighborhoods, allows new and improved land uses, and conforms to the area; prioritize investments in affordable housing that serves the working class neighborhoods in, and adjacent to, our Target Areas; creation of quality jobs that pay a living wage within walking distance of the residential areas; improve the health of the community and environment; and help attain greenspace/park areas.

### **ii. Outcomes and Benefits of Reuse Strategy**

South Portland will utilize Brownfield funds to update and expand our inventory of Brownfield Sites; prioritize and select sites for inclusion to the program; conduct community engagement activities; and begin conducting thorough and redevelopment-focused Brownfield assessments. As part of our FY2019 Assessment Grant, we spent time identifying and prioritizing sites, conducting public outreach, and planning for redevelopment. On this grant, we intend to continue to build on those efforts, and we are ready to “hit the ground running” by immediately conducting broad owner outreach and public

involvement to get more sites entered into the program. Owner outreach can be vital to the program by providing information on how, and why, owners should consider entering their sites into the program.

The goal of our Brownfield program will be to assess sites and return distressed, blighted, and otherwise underutilized properties back to economic vitality or for the public's use and enjoyment, utilizing green construction and renovation principals including sustainable and green energy efficiency measures as outlined in the City's One Climate Future Plan. These benefits are not only expected for the sites entered into the Brownfield program, but also for nearby properties that have been impacted by their proximity to these Brownfield sites. The eventual remediation of Brownfield sites will minimize risk of exposure to human health and the environment both at the selected Brownfield Sites and also for nearby properties that have been impacted by their proximity to these Brownfield sites. The eventual remediation of Brownfield sites will also minimize risk to waterways adjacent to our Target Area, such as the Fore River, Portland Harbor and its fisheries. Additional expected outcomes of completing remedial activities of select Brownfields sites will be the new investment that occurs, creation of new jobs, as well as the increased tax base accompanying the revitalization and redevelopment within the waterfront areas.

We will also include creation/preservation of greenspace as a factor for Site selection. We will solicit input from the City's Open Space Committee and the South Portland Land Trust (a member of our Brownfield Advisory Committee [BAC]) on properties which have greenspace potential. We will also explore a proposed expansion of the Greenbelt Multi-Use Trail through the Liberty Shipyard to Bug Light Park (our Fore River Waterfront Area), and from the Veterans' Memorial Bridge to our Main Street Corridor Target Area, by performing assessments and remedial planning for land acquired by the City.

### **c. Strategy for Leveraging Resources**

#### **i. Resources Needed for Site Reuse**

If additional assessment work is needed, the City will seek funding through the EPA Brownfield Assessment program and MEDEP 128A funding. We also have a long-standing relationship with the Greater Portland Council of Governments (GPCOG) and will leverage their Brownfield Assessment Program, as necessary. The City is well-versed in using these resources; as part of our FY2019 Brownfield Assessment Grant, the City leveraged approximately \$12,000 from the MEDEP 128A through in-kind assessment services, and \$39,700 from GPCOG for assessment tasks. The City also intends to utilize municipal Tax Increment Financing (TIF) funds; Brownfield activities have already been approved by the City Council and Maine DECD as an eligible use of those funds. Once a Site has been assessed through our Program, and if Site remediation is needed, the City will assist site owners obtain funding through EPA Brownfield Cleanup grants, Maine DECD Brownfield RLF grants and loans, and GPCOG Brownfield RLF cleanup funds. A site that was assessed through our FY2019 Assessment Grant (Yard South at the Liberty Shipyard) was awarded \$400,000 from the Maine DECD to perform necessary cleanup. The City will also utilize City CDBG funds for redevelopment and cleanup activities.

Our Brownfield program includes ABCA/RAPs with cleanup cost estimates that provide potential Site developers with a clearer understanding of potential Brownfields hazards (and associated cleanup costs) at Brownfield Sites. This information eliminates uncertainty and makes Brownfield Sites vastly more desirable to Site developers. The Knightville and Mill Creek Master Plan (neighborhoods in our Fore River Waterfront Target Area) envisions future mixed-use commercial redevelopment, including housing. Thorough Brownfield assessment in this area could help catalyze private investment of approximately \$15-20M to redevelop key commercial areas into mixed-use commercial and residential development. Likewise, continued redevelopment of the Liberty Shipyard site, which is, and will continue to be assessed through the City's program, is estimated to result in a private investment of \$80-100M for mixed use development in the Fore River Waterfront Target Area.

#### **ii. Use of Existing Infrastructure**

Our Target Areas have all the infrastructure in-place to support our assessment and redevelopment strategy. Both the Fore River Waterfront and the Main Street Corridor are serviced by high-speed internet, power, public transportation, and are connected to municipal water and sewer utilities. Because one of the goals of our Brownfield Assessment Program will be to develop affordable housing opportunities and encourage economic growth through infill of vacant buildings, Brownfield sites will be selected for inclusion into the program, in part, due to their proximity to existing infrastructure. Both Target Areas are poised to be redeveloped with safe and affordable housing options for our sensitive populations and have the infrastructure required to support this development, along with light industrial, manufacturing, and service-based industries that will provide jobs to the citizens of South Portland. The Fore River

Waterfront Target Area also has the benefit of being located directly on the waterfront in Casco Bay, making it an attractive geography for development. The redevelopment options available to our Target Areas are endless, and the infrastructure is in place to support the desired development options.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **a. Community Need**

#### **i. The Community's Need for Funding**

In recent years, the City of South Portland has experienced significant population growth (over a 9% increase from 2000-2019)<sup>3</sup> from domestic in-migration and from refugees and immigrants; from 2018 to 2019, the foreign-born population increased from 9% to over 12%<sup>4</sup>. Cumberland County is significantly more racially and ethnically diverse than other Maine counties, and our foreign-born population is almost 3x the State average. These population increases and diversification of our City has led to a tightening in the local housing market and a dramatic increase in demand for affordable workforce housing (as of 11/23/2021 the South Portland Housing Authority has 1,119 applicants for affordable housing on waiting lists); and has also placed a significant strain on City and school resources as we assist our immigrant population with language training, vocational training, job placement, and transportation needs.

Over 12% of City residents are living below the poverty line; this increases to nearly 20% for children under the age of 18, and 11.6% of South Portland households reported annual incomes less than \$15,000<sup>2</sup>. An estimated 30.6% of households rely on Social Security income, 5.4% on Supplemental Security Income, 2.6% on cash public assistance, and 12.6% on Food Stamp/SNAP benefits. The U.S. Census also reports that poverty in the City is increasing; from 2010-2017, the percentage of residents in poverty rose from 6.7% to 12.4%. Census Tract 30, which runs along the northern side of Main Street in our Main Street Corridor Target Area is a Low-Income Community Opportunity Zone. This Census Tract has a median household income of approx. \$54,000, which is 8% lower than the state of Maine (\$59,000) and also has the percentage of households below the poverty at 14%, which is 3% higher than the rate for the State (11%)<sup>5</sup>. The City's three census tracts with the highest Low and Moderate-Income (LMI) populations are located on the waterfront, including Pleasantdale, Ferry Village, and much of the Main Street Corridor.

South Portland's immigrant population and low-income residents, combined with the large number of contaminated and blighted industrial Brownfield Sites, places strain on the City's annual municipal budget. Pressures to keep local tax burdens low, partly based on shrinking wages and declining quality of life, limit the City's funds for economic development. As such, the City relies on grant funding and limited Tax Increment Financing (TIF) Districts; while some TIF-funded revitalization has occurred, in general, the City does not have the capacity to fund the numerous environmental cleanups which would be necessary for revitalization of our Target Areas. Meanwhile, recent gains in community development are threatened by a weakening tax base and cuts in City spending forced by reductions in state support for roads and schools, resident's reliance on vanishing jobs, and economic shifts from manufacturing/professional jobs to a shrinking service sectors that provide lower wages and less job security. Brownfield funds will inject much-needed capital specifically earmarked for assessment, cleanup, and reuse of Brownfield and contaminated sites in Target Areas; areas which the City has identified as targeted redevelopment areas. Without these funds, the City fears that the Target Areas will continue to remain underutilized, undervalued, and contamination risks to the sensitive populations that live and work within them.

#### **ii. Threats to Sensitive Populations**

##### **(1) Health or Welfare of Sensitive Populations**

The vulnerable and disadvantaged residents of the Fore River Waterfront Target Area include immigrants, children (16% of the Target Area population), and the elderly (nearly 20% of the Target Area population). These sensitive populations (children and the elderly) are common in the City; however, there is significant population of at-risk individuals that are unique to our Main Street Corridor Target Area: as of November 2021, there are 437 homeless and/or asylum-seeking immigrant individuals (across 137 families) in transient housing. Health and homelessness are inextricably linked; according to the U.S. Department of Housing and Urban Development, people in shelters are more than twice as likely to have a disability, and in 2017, they estimated that 20% of any homeless population has mental illness and 16% have conditions related to chronic substance abuse. These at-risk and vulnerable populations live in our Target Areas due to the two main reasons: presence of an aging and dilapidated housing stock; and reduced property values due

<sup>3</sup> American Community Survey, census.gov

<sup>4</sup> <https://datausa.io/profile/geo/south-portland-me>

<sup>5</sup> <https://opportunitydb.com/zones/23005003000/>

to historic industrial and Brownfield contamination, blight, and disinvestment. Brownfield Sites and bulk oil storage tank facilities have made our Target Areas undesirable and potentially hazardous places to live. Houses in our Fore River Waterfront Target Areas are the oldest in the City; EPA EJScreen reports that up to 77% of the homes in our Fore River Waterfront Target Area were constructed prior to 1950. These aging structures are often characterized by asbestos, lead paint, and 75+ years of heating oil use and storage. The Main Street Corridor Target Area was identified in the 2008 HUD Neighborhood Stabilization Program due to excessive mortgage foreclosure rates. According to HUD CPD Systems data, up to 39% of residents in this census tract were low income and up to 61% of those residents faced “severe housing cost burden”. Further devaluing residential properties in our Target Area is the fact that they abut Brownfield/industrial sites and are located in the shadows of the City’s multiple bulk petroleum facilities which are known to contribute to air pollution in the Target Area. Brownfield Sites in our Target Area have resulted in soil and groundwater impacted by lead, petroleum, and heavy metals. These industrial relics abut residential areas and create exposures and health risks to sensitive populations; they also discourage and limit growth and redevelopment in two areas (the Fore River Waterfront and the Main Street Corridor Target Areas) that the City has prioritized for sustainable mixed-use redevelopment. This has contributed to urban sprawl and greenfield development on the outskirts of our City.

Brownfield assessment and redevelopment in our Target Areas will reduce environmental contamination and blight, increase property values, and encourage sustainable development. We will prioritize Sites for inclusion into the program on their likelihood of creating safe and affordable housing; creating jobs; and providing amenities, restaurants, and greenspace that will make the neighborhood safer and livable for the sensitive populations that live therein.

## **(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions**

The disadvantaged and LMI populations in our Target Areas are disproportionately impacted by environmental contamination due to Brownfield sites like the Liberty Shipyard and Rigby Railyard, bulk oil tanks, and industrial contamination. Compared to the rest of the nation, individuals in our Target Areas are at higher exposure risk due to their proximity to Risk Management Plan (RMP) Facilities (our Target Areas are in the 96<sup>th</sup> and 98<sup>th</sup> percentile, respectively) and hazardous waste sites (census tracts in our Target Areas are in the 92<sup>nd</sup> percentile) (EPA EJScreen). The Target Areas also contains dozens of bulk petroleum storage tanks with millions of gallons of storage (regulated through more than 20 EPA emissions licenses); these tanks are a significant contributor to air pollution. The EPA is currently in a lawsuit against some of these petroleum facilities, including Sprague Energy and Global Partners, for exceeding emission standards, and to force them to reduce emissions of volatile organic compounds from bulk tanks storing No. 6 fuel oil. VOCs, some of which are known carcinogens, have been detected at alarming concentrations in air throughout the residential neighborhoods of our Target Areas; when odors are present, people complain of headaches and say the air stings their noses<sup>6</sup>. Health impacts from the cancerous volatile organics emitted from bulk petroleum tanks in the Target Area are compounded by the fact that Maine is situated in the nation’s “tail-pipe,” where the Jet Stream deposits smog, smoke, and ozone. The Maine CDC states that 12.8% of adults in this area suffer from asthma compared to 8.9% nationwide.

The aging housing stock in our Target Areas also represents a health concern to our residents. EPA EJScreen estimates that up to 77% of the homes in our Target Areas were constructed before 1950, versus 57.7% for Maine or 54.8% for the United States<sup>7</sup>. *This means 3 of 4 individuals, many of whom are elderly, immigrants, and low-income, are living in aging homes which may have lead and asbestos impacts and poor indoor air quality, and may be contributing to asthma and cancer rates.* Not surprisingly, that some of the individuals in our Target Areas fall in the 98th percentile for exposure to lead based paint compared to the rest of the nation<sup>7</sup>. According to the Maine Center for Disease Control (CDC), Greater Portland has twice the state average of children with elevated blood lead levels (5.4% vs. 2.9% respectively); this is due in part to our aging and dilapidated housing stock. and highlights the need for safe and affordable housing. Brownfield assessment, redevelopment and revitalization will reduce health threats to our community by evaluating and quantifying environmental threats at Brownfield sites, performing remedial planning to eliminate hazardous environments in the Target Area, contributing to the revitalization of our Target Areas, and supporting creation of safe and affordable housing for all people, regardless of income, race, or status.

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<sup>6</sup> <https://insideclimatenews.org/news/07122019/south-portland-oil-tank-farm-air-pollution-health-hazard-asthma-testing>  
<sup>7</sup> American Community Survey, 2017 ACS 5 Year Estimates Data Profile

### (3) Promoting Environmental Justice

Both of our Target Areas have experienced historic environmental justice issues. During World War II, the U.S. Government acquired large tracts of land by eminent domain at Cushing’s Point along the waterfront in our Fore River Waterfront Target Area to facilitate the construction of the Liberty Shipyard. Hundreds of working-class residents were soon displaced to make room for the new industrial buildings. Then, to support the estimated 30,000 employees who worked at this facility, thousands of new housing units were quickly and cheaply built in less-desirable areas of the City for workers and their families. In this same era, the Rigby Rail Yard was expanded in our Main Street Corridor Target Area to support the City’s industrial efforts, and quickly became the busiest New England rail yard north of Boston. In conjunction with these war-time efforts, 120 massive bulk oil storage tanks were constructed throughout the City the majority of which are located in one of the City’s two Target Areas. When the war ended, the support and need for the Liberty Shipyard faded. Buildings at and surrounding the shipyard were shuttered, the area became dilapidated and abandoned, and people left the area to find new jobs. The Waterfront Target Area was left with hulking industrial relics, vacant and deteriorated homes, 120 bulk oil petroleum storage tanks, and widespread industrial contamination of the soils, groundwater, and air.

The environmental concerns in our Target Area disproportionately impact the sensitive populations that live here. As detailed by the U.S. Census, the City’s census tracts with the lowest-income populations are located on our Target Area. Additionally, due to COVID restrictions at homeless shelters in nearby Cities and the influx of refugees to our state, our Target Areas have become the home for many “New Mainers” and unfortunately, a large homeless population. These individuals have settled in our Target Areas due to low property values and low-rent motels and apartments. The City views this as a troubling issue of environmental injustice. People are forced to live in the Target Area, in the shadows of the bulk storage tanks, and adjacent to industrial-contaminated land, because these areas represent a lower cost of living compared to more prosperous neighborhoods in the City. We wish to advocate for these residents in the pursuit of fairness and equity as it relates to public health, quality of life, economic opportunity, and environmental justice. This will be accomplished, in part, by cleaning up contamination at Brownfield sites and providing safe and affordable housing options in the Target Areas.

#### b. Community Engagement

##### i. Project Involvement and ii. Project Roles

The BAC includes community planning groups and other stakeholders; this group assists in Site selection, with public education and outreach (by helping advertise public meetings and outreach materials on their website and distribution lists), and for soliciting and responding to public input.

Organization	Point of Contact	Involvement in the project/assistance provided:
South Portland Housing Authority (SPHA)	Michael Hulsey Executive Director mhulsey@spha.net 207-773-4140	The mission of the SPHA is in-line with the goals of our Brownfield program: to provide safe and affordable housing for lower-income, elderly, or disabled individuals/families. SPHA has experience with Brownfield cleanup and redevelopment through their FY19 EPA Cleanup Grant for the Thornton Heights Housing Project in our Main Street Corridor Target Area. They will serve on the BAC and provide guidance for housing at Brownfield redevelopment sites.
South Portland Community Chamber of Commerce	Alice Goodwin President 207-772-2811	The Chamber of Commerce promotes business development in our region and will help advertise the program and disseminate outreach materials. They will work with local businesses to identify redevelopment opportunities, and with owners who may have interest in the City’s program. BAC Member.
South Portland Land Trust	Richard Rottkov President rrottkov@yahoo.com,	This nonprofit is committed to the preservation of open space, creating a City-wide network of trails, land stewardship, and acquisition of open spaces. They will assist in site solicitation and prioritization and will serve on the BAC.

##### ii. Incorporating Community Input

The City has been conducting public outreach since 2017, PRIOR to our first Brownfield Assessment Grant. At that time, the City Council and the public identified redevelopment of the waterfront as one of the highest priorities. This input was the cornerstone of our FY2019 Brownfield grant application and continues to define the Target Areas of these Brownfield Assessment Programs. The City has always been, and continues to be, committed to the idea that community input is the cornerstone of any successful and long-standing Brownfields program. As part of our previous Brownfield Assessment

Grant, we developed a comprehensive information repository on our municipal website, developed public outreach materials, and held four outreach meetings with the public and municipal officials.

The City will publish an announcement in a local newspaper (the Sentry), on our website and social media platforms, and through community organizations. This announcement will provide info on the new program, direct the public to our information repository, and advertise [our Brownfields@southportland.org email address](mailto:our.Brownfields@southportland.org) as a way for the public to contribute ideas and ask questions regarding the program. We will update existing public outreach materials (informational brochure, Site Owner information sheet, and Site nomination form), and intend to create a Frequently Asked Questions handout that highlights questions and comments which have (and will be) received by the public during the assessment process.

The City proposed to conduct up to three public education and information meetings throughout the project. One will be held at the onset of the project, and the remaining meetings will likely be held during assessment and/or remedial and reuse planning phases of work. Quarterly BAC meetings will also be open to the public and advertised. Meetings will be held at City Hall and via Zoom teleconferencing. Project stakeholders include site owners, neighbors, developers, community organizations, citizen groups, lenders, EPA, and the MEDEP will be encouraged to attend and provide input on the project. We intend for these meetings to be community planning charrettes to solicit direct public involvement and develop cleanup and reuse options that incorporate green space, recreational activities, and architectural options for the reuse of existing buildings, as well as any community needs for the proposed site redevelopment. We will advertise these meetings publicly via e-mail, a legal announcement in the local newspaper(s), and on the City’s website, and will make meeting minutes publicly available. The City Clerk will maintain regular status updates; make reports available for review at City Hall; issue press releases, legal ads, and other public notices as needed; and, inform local news outlets of public meetings.

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Description of Tasks/Activities and Outputs**

<b>Task/Activity: Cooperative Agreement Oversight</b>
i. Project Implementation: The City will conduct programmatic oversight; develop a request for proposals and hold interviews to select a QEP per the City’s competitive bid/purchasing policy; attend the National Brownfield conference and regional EPA/MEDEP trainings as available. We will re-convene the BAC from our FY2019 grant, which consists of municipal officials, partner organizations, QEP, MEDEP, and EPA. The City and QEP will communicate with regulatory personnel, community officials, and the public; and will complete quarterly reports, financial reports, and ACRES updates on a regular basis. - Tasks/Activities for the Priority Site(s): Not Applicable - Tasks/Activities for Non-Priority Site(s): Not Applicable - Non-EPA Grant Resources Needed: None
ii. Project Schedule: The BAC will meet in the first month, and quarterly thereafter to ensure that the priorities and direction of the Brownfields program are being met. QEP selection within three months of funding award. Quarterly reports and ACRES updates performed throughout the grant period.
iii. Task/Activity Lead: City lead with BAC assistance on QEP selection. The QEP will perform quarterly reports and ACRES updates.
iv. Outputs: Our BAC will be re-established; competitive RFP for QEP selection; quarterly meetings with the BAC; 12 quarterly reports; ongoing ACRES input/updates.
<b>Task/Activity: Community Engagement</b>
i. Project Implementation: The City will update the existing information repository and advertise the <a href="mailto:Brownfields@southportland.org">Brownfields@southportland.org</a> email address as a way for the public to contribute ideas and ask questions. We will update public outreach materials (informational brochure, Site owner information sheet, and Site Nomination Form) and create an FAQ sheet to answer questions received from the public. We will provide notice in the newspaper, and on our website and social media platforms that the Brownfields program has been refunded. The City will hold at least three public meetings to educate local officials and citizens about the Brownfields process, provide program updates, and to solicit input from the public. Meetings will be held at City Hall and via Zoom teleconferencing. The City and QEP will hold one-on-one meetings with property owners as needed. City staff and the QEP will also conduct site or area-specific outreach, public meetings, and communications, as necessary and requested from the public and/or project stakeholders. - Tasks/Activities for the Priority Site(s): Public meetings will include discussions about our Target Sites, potential assessment tasks, and reuse/remedial strategies. Owner outreach will be conducted. - Tasks/Activities for Non-Priority Site(s): Site nomination forms will be distributed, and public input will be solicited during public meetings and via the website to identify potential Sites for the program.

- Non-EPA Grant Resources Needed: Community partners will be used to help advertise public meetings and solicit input from the community.
ii. Project Schedule: Community outreach will occur continuously throughout the 3-year grant period. The first public informational meeting is anticipated to be held in the first three months after QEP selection. Public outreach materials will be updated within 1-2 months of QEP selection.
iii. Task/Activity Lead: City and QEP, with assistance from the BAC.
iv. Outputs: Updated information repository, Brownfields@southportland.org email address; updated outreach materials (brochures, forms, handouts) and FAQ sheet; at least 3 public meetings and associated informational material; and a news article in the local paper. Meetings with site owners as needed.
<b>Task/Activity: Phase I and Phase II Assessments</b>
i. Project Implementation: The City has an inventory of Brownfields sites and has identified 35 “Priority Petroleum/Brownfield Sites”. Inventories will be updated, and sites will be prioritized based on the goals of the City and the Brownfields Program. - Tasks/Activities for the Priority Site(s): The QEP will obtain Site eligibility and access agreements, and will conduct Phase I ESAs, SSQAPPs and Phase II ESAs for Priority Sites. - Tasks/Activities for Non-Priority Site(s): When the BAC has approved a site for inclusion into the program (priority will be given to sites that support the goals outlined in our Comprehensive and Master Plans), the QEP will prepare a Site Eligibility Form for EPA approval. South Portland and its QEP will prepare and obtain site access agreements. In addition to the priority sites, up to 11 additional Brownfields Sites will be assessed through this grant (13 total sites). For each site, we assume that the QEP will conduct a Phase I ESA in accordance with the ASTM E1527-13/21 and EPA’s “All Appropriate Inquiry”, a SSQAPP, and a Phase II ESA in accordance with ASTM E1903-11 or equal. We have assumed that a Hazardous Building Materials Inventory will be prepared for 8 of these Sites. Reports/deliverables will be submitted to the City, EPA, and MEDEP for review and approval - Non-EPA Grant Resources Needed: None
ii. Project Schedule: The City and QEP will obtain site eligibility and access agreements for the Priority Sites in the first month. The site inventories will be updated within 2-3 months of QEP selection. Phase I ESAs, SSQAPPs, Phase II ESA, and HBMI will be completed throughout the grant period
iii. Task/Activity Lead: The QEP will lead site assessments with City assistance.
iv. Outputs: EPA/MEDEP eligibility determinations, site access agreements, revised site inventory, 13 Phase I ESAs, 13 SSQAPPs, 13 Phase II ESAs, 8 HBMI.
<b>Task/Activity: Cleanup Planning &amp; Area-Wide Planning</b>
i. Project Implementation: - Tasks/Activities for the Priority Site(s): Once Phase I, Phase II ESAs, and HBMI are complete, ABCA/RAPS will be completed for Priority Sites, as described below. ABCA/RAPs will be prepared for the Liberty Shipyard parcels based on information obtained during our FY19 Assessment Grant. - Tasks/Activities for Non-Priority Site(s): The City and the QEP will review Phase II ESA data for each Site and will develop an ABCA/RAP, utilizing reuse input from the public and/or site developers, if applicable. We have assumed that 8 sites (inclusive of the Priority Sites) will require preparation of ABCA/RAPs. The ABCA/RAP will include remedial actions for identified contamination that exceeds applicable MEDEP cleanup standards. Remedial alternatives will be evaluated on cost, feasibility, and effectiveness in protecting human health and the environment. Based on this analysis, a proposed remediation plan will be developed based on potential reuse scenario(s) for the site. We may develop reuse alternatives on select sites using planning techniques like the ones described in the Comprehensive Plan and the neighborhood Master Plan for the Knightville and Mill Creek areas. We anticipate that each Site that requires an ABCA will be submitted to the MEDEP Voluntary Response Action Program (VRAP). - Non-EPA Grant Resources Needed: None
ii. Project Schedule: ABCA/RAPs and VRAP Applications for the selected sites are anticipated to be completed throughout the grant period, after completion of Phase II ESAs.
iii. Task/Activity Lead: QEP with City assistance.
iv. Outputs: Outputs include 8 ABCA/RAPs and 8 VRAP submittals

**b. Cost Estimates**

A breakdown of costs by task, along with a summary cost table, is provided below.

**Task 1: Cooperative Agreement Oversight:** \$5,000 for City personnel to oversee the program (100 hours @ \$50/hour); \$5,300 travel total (\$1,600 airfare + \$1,600 hotel + \$1,200 food for 2 City staff to attend 1 EPA National Brownfields conference and 1 EPA/MEDEP-training seminar, plus \$900 local travel to

meetings); \$1,000 for supplies (copies, phone calls, contract documents); and \$9,500 contractual for QEP to assist the City with cooperative agreement oversight. Total Task 1 = \$20,800.

**Task 2: Community Engagement:** \$11,000 for City personnel to oversee the program (220 hours @ \$50/hour); \$2,500 for supplies (copies, brochures, outreach, mailings); and \$13,500 contractual for QEP to assist the City on public outreach and educational efforts. Total Task 2 = \$27,000.

**Task 3: Phase I & II Site Assessments:** \$5,000 for South Portland personnel for site selection, interfacing with site owners, and overseeing ESAs (100 hours @ \$50/hour); and \$382,000 contractual for QEP services (13 Phase I ESAs @ \$4,000 = \$52,000; 13 SSQAPPs @ \$3,600 = \$46,800; 13 Phase II ESAs @ \$19,200 = \$249,600; and 8 HBMI's @ \$4,200 = \$33,600). Total Task 3 = \$387,000.

**Task 4: Cleanup Planning & Area-Wide Planning:** \$8,500 for City personnel to assist with reuse/redevelopment planning, coordinating with Site owners and potential Site redevelopers, and review of ABCA/RAPs (170 hours @ \$50/hour); \$1,500 in supplies (letters/correspondence with Site owners, meeting materials for redevelopment charettes, brochures, and marketing materials) and \$55,200 contractual for QEP to conduct 8 ABCA/RAPs @ \$4,400/each = \$35,200, and 8 VRAP Applications and submittals @ \$2,500/each = \$20,000. Total Task 4 = \$65,200.

Budget Categories		Project Tasks				Total
		Task 1: CA Oversight	Task 2: Community Engagement	Task 3: Phase I & II Assessments	Task 4: Cleanup/Area-Wide Planning	
Direct Costs	Personnel	\$5,000	\$11,000	\$5,000	\$8,500	\$29,500
	Fringe Benefits	--	--	--	--	--
	Travel	\$5,300	--	--	--	\$5,300
	Equipment	--	--	--	--	--
	Supplies	\$1,000	\$2,500	--	\$1,500	\$5,000
	Contractual	\$9,500	\$13,500	\$382,000	\$55,200	\$460,200
	Other	--	--	--	--	--
<b>Total Direct Costs</b>		<b>\$20,800</b>	<b>\$27,000</b>	<b>\$387,000</b>	<b>\$65,200</b>	<b>\$500,000</b>
<b>Indirect Costs</b>		--	--	--	--	--
<b>Total Budget</b>		<b>\$20,800</b>	<b>\$27,000</b>	<b>\$387,000</b>	<b>\$65,200</b>	<b>\$500,000</b>

**c. Measuring Environmental Results**

The City will manage this project utilizing time-proven techniques to ensure project funds are expended timely and efficiently, similar to our successful management of the FY2019 EPA Assessment Grant. The City along with its QEP will hold monthly status meetings to review priority sites, schedule, and budget. We will utilize our Quarterly Reports and ACRES to monitoring project progress.

Our expected outcomes are to return the selected Brownfield sites and nearby areas impacted by the stigma of perceived proximity to contamination and tangible blight back to economic vitality. Remediating the Brownfield sites will minimize exposure at the site and adjacent properties and, just as importantly, impacts to our Target Area and Casco Bay. Additional expected outcomes of completing Brownfields site assessment, remedial planning, and eventual cleanup will be job creation, infill development, creation of safe and affordable housing, an increased tax base accompanying revitalization and redevelopment, and community reinvestment in our Target Areas.

Our completion of prepared environmental reports (i.e., Phase I and Phase II ESAs, SSQAPPs, ABCA/RAPs) will document progress at each site and will also be outputs of our program. We will track the reports internally and make sure that each is distributed to our stakeholders for comments before finalizing. Sites will be entered into the MEDEP VRAP; outputs of this assessment step will include obtaining “No Action Assurance” letters and “Certificates of Completion” from MEDEP. Successful VRAP completion will ensure necessary remedial actions were conducted to eliminate contamination and protect human health and the environment. We will track the number of sites assessed and the particulars of the assessed sites (i.e., acres of site, contaminants found, assessment money spent, leveraged money, job creation, etc.) via quarterly reports and the EPA ACRES online database. Completing the work described above will help transition these properties to the next step of redevelopment and reuse. These documents and work products will provide the liability protections (Phase I/VRAPs) required to stimulate redevelopment, as tools like ABCA’s will help determine cleanup costs and attract developers.

## **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

### **a. Programmatic Capability**

#### **i. Organizational Capacity, ii. Organizational Structure, and iii. Description of Key Staff**

The City of South Portland employs hundreds of people, with fully-staffed planning and development, finance, and engineering departments. Our employees have the knowledge to manage community development programs of similar size and complexity to the EPA Brownfields program. **Joshua Reny**, the Assistant City Manager, will act as Project Director and will have direct oversight of the management of this program. Josh managed the FY19 Brownfield Assessment Grant for the City and has extensive experience working with the business community, property owners, and developers. In addition to Brownfields, he has administered a variety of grants for redevelopment projects, including Small Harbor Planning Grants and Community Development Block Grants (CDBG).

Mr. Reny will be assisted by **Milan Nevajda**, the Planning and Development Director. Milan's experience includes development review, long-range and master planning, economic development strategic planning, and environmental protection. Milan previously led the Sonoma County Planning Division, covering a 1,770 square mile region, and he also previously worked as a planning consultant; first in Maine then in the Bay Area, California. As a consultant Milan worked on South Portland's Mill Creek master plan. He has experience completing comprehensive, master, neighborhood, and open space plans. Mr. Reny and Mr. Nevajda will be further assisted by South Portland City Manager Scott Morelli; Mr. Morelli is the former City Manager for the City of Gardiner, Maine, and in that role, facilitated numerous Brownfields Programs, including \$600,000 in EPA assessment grants, and \$600,000 in EPA, DECD, and KVCOG Cleanup grants.

#### **iv. Acquiring Additional Resources**

Similar to our FY2019 EPA Brownfield Assessment Grant, the City intends to contract with an experienced QEP to assist facilitate our Brownfield program. The City routinely creates requests for proposals and qualifications and conducts competitive procurements to obtain appropriate resources for proposed projects throughout South Portland, and the Assistant City Manager works closely with South Portland Public Works on many of these projects. We will also utilize the BAC, MEDEP, and when necessary, the EPA to design, coordinate, and oversee the successful completion of the Brownfield Assessment Program, and for assistance with programmatic requirements. All City projects are publicly bid and advertised. Other City staff members who will likely assist with the Brownfield Program include employees of the Planning and Development Department, Finance Department, and City Engineer.

### **b. Past Performance and Accomplishments**

#### **i. Currently Has or Previously Received an EPA Grant**

##### **(1) Accomplishments**

The City successfully managed a \$300,000 FY2019 EPA Brownfield Community-Wide Assessment Grant (BF00A00518). Through these funds, we developed a comprehensive information repository on our municipal website; developed public outreach materials; and held four outreach meetings with the public and municipal officials. We completed a Brownfield inventory of Site and prepared a Petroleum Corridor Study that identified 35 "Priority Petroleum/Brownfield Sites" in our Target Areas. As shown in ACRES, eight properties were successfully entered into the Program, and Phase I ESAs were performed for all 8 sites. For 7 sites associated with the Liberty Shipyard, we also completed a SSQAPP, Phase II ESA, HBMI, and remedial planning. Notably, the City leveraged significant funds to support their FY2019 Assessment Grant, including: \$13,000 in municipal in-kind service; \$39,700 from GPCOG for assessment tasks; \$10,800 in municipal TIF Funds; approximately \$12,000 in assessment from the MEDEP 128A Brownfield program; and \$400,000 from the Maine DECD RLF Cleanup Grant for cleanup activities at the Liberty Shipyard. The FY2019 grant was completed one year ahead of schedule, and to date, is 100% drawn down with funds expended. The City has achieved significant results in a short period of time, highlighting the need for additional Brownfield funds to keep our momentum going.

##### **(2) Compliance with Grant Requirements**

Throughout our FY2019 Brownfield Assessment Grant, the City submitted quarterly reports, deliverables, and ACRES updates on-time and in accordance with EPA requirements. No submittal or tracking issues were identified for this cooperative agreement, and the Assessment Grant was completed in accordance with our approved work plan, schedule, and terms and conditions with no corrective actions issued. All financial statements were properly submitted. The grant period for this Brownfield Assessment Program was July 1, 2019 to September 30, 2022; however, funds were fully expended, the grant was completed, and appropriate closeout documents were completed one year ahead of schedule, in September of 2021.

# **ATTACHMENT A**

## **Threshold Criteria for Assessment Grants**

**City of South Portland, Maine  
EPA FY2022 Brownfields Assessment Grant Proposal**

## **Threshold Criteria**

### **1. Applicant Eligibility**

The City of South Portland, Maine is a municipality (*General Purpose Unit of Local Government*) eligible to apply for Brownfields Assessment funding from the U.S. Environmental Protection Agency (EPA) Brownfields Grant Program.

### **2. Community Involvement**

The City of South Portland will hold up to three public meetings during the grant period. We will advertise meetings through advertisements in the local newspaper, on the City's website, and through social media outlets. We may also target select property owners in our Target Area (identified during prior Brownfield Inventories) and send direct invitations via mail or email. At these meetings, we will provide general information on the Brownfield program, solicit comments and feedback from the public, and respond to any public comments which have been received. Responses to questions will be assembled in a Frequently Asked Question document that can be distributed with other community outreach materials such as tri-fold brochures and handouts. The City will use the COVID-19 PPE and the Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants fact sheet (August 2020) as a resource for alternatives to face-to-face meetings; we anticipate all public meetings will also be broadcast via Zoom teleconferencing. The majority of our community speaks English, but we will provide interpreters and/or language translations and accommodate any special needs, as needed.

We will communicate the progress of our Brownfield assessment program to citizens through regular status updates and meeting minutes which will be available on the City's website (the City has an established online information repository). The City will prepare press releases, legal ads, and other public notices, as needed. The City also intends to solicit local news coverage of public meetings and Brownfield events, such as public outreach and education meetings, Site walks, and redevelopment/reuse planning charettes. The City intends to update existing outreach material and prepare new material as part of this grant, based on input from the public. We are also excited to advertise and implement our newly-developed "[brownfields@southportland.org](mailto:brownfields@southportland.org)" email address as a way to solicit input from the public.

### **3. Named Contractors and Subrecipients**

The City chooses not to name procurement contractors, consultants, or subrecipients as part of this application. The City will select contractors in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500, and the EPA's *Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements*. We do not anticipate subrecipients as part of this grant.

### **4. Expenditure of Assessment Grant Funds**

The City of South Portland received a \$300,000 U.S. EPA Brownfield Assessment Grant in FY2019. The entirety of those funds were drawn down, payment was received from the EPA, and drawn down funds were disbursed prior to October 1, 2021. A copy of the City's Payment Transaction Confirmation (ASAPGov Confirmation, dated September 15, 2021) has been attached to this document.

# **Threshold Attachment**

**Payment Transaction Confirmation / Expenditure of FY2019 Assessment  
Grant Funds**

**City of South Portland, Maine  
EPA FY2022 Brownfields Assessment Grant Proposal**

## Payment Transaction Confirmation

Payment Request Sequence Number : 09-15-2021 90210353

Payment Request Type :	Individual
Payment Method :	ACH
Bank Relationship :	211274450****3980
Requested Settlement Date :	09/17/2021
Requested Date and Time :	09/15/2021:09:27
Total Items :	1

**Recipient : CITY OF SOUTH PORTLAND (1149519)**

**Federal Agency : RTPFC-Grants (68128933)**

**Cash On Hand : Total :\$300,000.00**

Seq # / Item #	Account ID	Account Status	Request Reference Number	Available Balance	Remittance Code	Remittance Amount	Amount Requested	Payment Request Status
00000/1	BF00A00518	Open		\$0.00				Warehoused
	BF00A00518-G100NY00	Open					\$300,000.00	

## Jaime L. Madore

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**From:** Reny,Joshua <jreny@southportland.org>  
**Sent:** Monday, November 22, 2021 12:49 PM  
**To:** Sanborn,Ellen; Madden,Parker; Jaime L. Madore  
**Subject:** FW: EXTERNAL: EPA Award BF-00A00518: Closeout Notification

FYI – Confirmation of close-out of the Brownfields Assessment grant.

Thank you,  
Josh

Joshua Reny  
Assistant City Manager  
City of South Portland  
Tel. (207) 767-7606

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**From:** Culhane, Diane <culhane.diane@epa.gov>  
**Sent:** Friday, November 19, 2021 2:13 PM  
**To:** Reny,Joshua <jreny@southportland.org>  
**Cc:** Peterson, Alan <Peterson.Alan@epa.gov>  
**Subject:** EXTERNAL: EPA Award BF-00A00518: Closeout Notification

**CAUTION:** This email originated from outside of the City of South Portland Mail System. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Dear Authorized Representative:

The Environmental Protection Agency (EPA) has received all required final reports and necessary forms to close-out the above-referenced award. Based upon administrative, programmatic and fiscal reviews, all documents have been deemed acceptable, the terms and conditions satisfied, and has been financially closed. Please note, any adjustments made by the recipient to the final Federal Financial Report during the approval process have been documented in Agency records.

This email constitutes the final action on this agreement and officially closes this award. However, the close-out of this award does not affect the right of EPA to disallow costs and recover funds on the basis of a later audit or other reviews. Information regarding record retention, property disposition in accordance with EPA regulations, and other frequently asked questions can be accessed through <https://www.epa.gov/grants/frequent-questions-about-closeouts>

If further assistance is required regarding this award, please contact the Grant Specialist or Project Officer, copied on this message.

Sincerely,  
EPA Grants Office