

1. Project area description and plans for revitalization

1.a. Target Area and Brownfields

1.a.i.: Background and Description of Target Area The target brownfield site is Parcel 3 of Detroit's Riverside Park, located on the Detroit River adjacent to the Ambassador Bridge, which connects the US to Ontario Canada. Riverside Park is within and adjacent to some of the most polluted zip codes in Detroit. The area is plagued by vacant blighted properties, high poverty, and high unemployment. The properties surrounding Riverside Park have primarily been used for commercial/industrial activities. Residential properties exist northwest along West Grand Boulevard and north of the Site. Adjacent uses historically included tobacco processing, auto parts manufacturing, lumber, rail and cement yards, steel factory, soap works, a incinerator and Detroit Sanitary Works. Residents are exposed to sources of particulate matter (PM 2.5) more here than any other area in the city due to traffic density and industrial facilities. Several nearby projects (e.g. Detroit Intl Freight Terminal, Gordie Howe International Bridge, and the Gateway, a combination of I-96 and I-75) aimed at reducing traffic congestion and minimizing additional air quality concerns have been developed or are under construction. These projects, along with the remediation and re-opening of Riverside Park, will spur economic development in this rapidly growing section of the city.

Detroit has historically been considered a major industrial hub in Southeast Michigan, hosting large and small industries. However, the last 50 years have seen an overall decline. Industries that once prospered have all declined contributing to odors, contaminated land, property abandonment and an abundance of brownfield sites. An average brownfield site in this area can range anywhere from the size of a residential lot to an industrial factory of many acres. The majority of site impacts are due to historical industrial activities resulting in contamination from the use of hazardous substances, such as, toxic metals, volatile organic compounds (VOCs), and semi-volatile organic compounds (SVOCs).

1.a.ii: Description of the Brownfields Site(s): Riverside Park is located on West Jefferson Avenue, adjacent to the Detroit River and Ambassador Bridge, within a commercial/industrial setting. A very small area in the southwest corner of Riverside Park's Parcel 3 is in the 100-year (AE) flood plain. Historically, the 19 acre Riverside Park had been made up of three parcels. Parcels 1 (5 acres), 2 (4 acres) and 3 (10 acres). In March 2012, the City of Detroit closed Riverside Park due to soil contamination. The City and residents are anxious to have the park restored and reopened as a key recreational venue that gives residents access to the Detroit River. Though the focus is on remediating contamination in Parcel 3, the history of all three parcels is relevant to understanding the sources of Parcel 3's contamination. A coal gas manufacturing plant (MGP) operated at Parcels 1 and 2 from 1867 to 1954. These parcels were acquired by the City and became part of Riverside Park in 1978-79. Parcel 3 (donated to the city in 1919) was an open body of water connected to the Detroit River and sometime between 1906 and 1928 the site was filled-in. The origin of the fill material is unknown but is thought to be construction debris and waste material from nearby industrial/commercial sites mixed with urban fill. The focus of this grant proposal is restricted to hazardous materials on Parcel 3 of Riverside Park. Parcel 3 is ten acres bounded by 24th Street, CSX Railroad, 3801 West Jefferson (soon to be incorporated as part of the park) and the Detroit River. Parcel 1 (northeast of the targeted brownfield site) was remediated in 2016 by DTE (local utility) and restoration by the Detroit General Services Department (GSD) is nearly complete. The remediation of Parcel 2 by DTE is expected to be completed in 2019 with GSD restoration by 2020.

Between 2002 and 2018, multiple environmental assessments (i.e., investigation, Phase II, RI/FS, etc.) were conducted at Parcel 3, including a USEPA FY15 Brownfield Site-Specific Assessment grant that identified levels of contaminants above MDEQ Part 201 cleanup criteria. Assessments have identified the presence of VOCs, SVOCs, and metals within soil and/or groundwater at various depths ranging from 0 – 33 ft below ground surface. Offsite migration onto the sites from various historic northerly adjoining and nearby operations, as well as, unknown sources of fill placed at the site, is likely to have contributed to the impacts identified at the site. Due care concerns addressed for Parcel 3 will target lead, 1,2,3-trichloropropane and cyanide concentrations in surface soils that exceed Michigan Generic Cleanup Criteria, regional background, or site specific clean-up criteria and present a potential dermal contact risk.

1.b.i Revitalization of Target Area The Detroit Parks Strategic Master Plan sees Riverside Park as offering a balance of active and passive recreational activities to the surrounding neighborhood. It will allow for residents to enjoy this venue within walking distance of their homes. The park will serve as the western terminus of the Detroit International Riverwalk, which connects recreational and economic hubs along the Detroit River. The Detroit Parks and Recreation Improvement Plan describes public green space as critical to the strength of every neighborhood. Parks promote healthy lifestyles, crime reduction, community interaction, climate change management, and educational opportunities. In areas of growth, parks serve as catalysts for economic development. In areas of decline, parks can provide an essential stabilizing effect. In short, the importance of Detroit's parks and recreation system cannot be overstated, and the City is committed to revitalizing these assets. Riverside Park falls into this commitment. To date, the City has invested \$6 million into this park, with plans for more future investment.

In January 2019, the City's Planning Department began the process of creating a framework for improvements to Detroit's Delray neighborhood, which surrounds Riverside Park. This is part of the Detroit's City-wide Strategic Neighborhood Initiative to improve economic conditions and quality of life for the citizens of southwest Detroit. Framework strategies include vegetative buffering, land assembly, industrial and commercial development, zoning and land use, streetscapes and connectivity. This framework was created with extensive community engagement, seeking input from community members throughout the process. Detroit's Recreation Department has worked closely with the Riverside Park Advisory Group, other organizations and community residents develop and implement plans for Riverside Park's redevelopment. The plan will engage residents to prioritize investments and then align city services and resources around those priorities to achieve greater neighborhood revitalization with in the communities. The City also plans to expand the 19 acre park to 30 acres. The reopening of the park is a much anticipated event for the City, especially the underserved Delray Community.

1.b.ii. Outcomes and Benefits of Redevelopment Strategy The City is currently in the process of executing a five phase revitalization of Riverside Park that aligns the City's Plan for Parks and Recreation Improvement with the city's revitalization plan for the Delray neighborhood.

Cleaning up Parcel 3 will enable the City to undertake Phases 4 of Riverside's revitalization plan. Environmental remediation of the site will allow for the creation of a unique, much needed picnic location along the Detroit River. Implementation of the revitalization plan for Riverside Park has already begun, with two phases nearly complete. Once finished, Riverside Park will become a recreation destination that includes: sports fields, picnic areas, performance shelters, a boat launch, a skate park, a dog park, horseshoes courts, fishing access, playgrounds, a splash pad, and restroom/concession buildings. Redevelopment of Parcel 3 also includes energy efficiency lighting project to include LED lighting throughout the park. Access to the park's boat

launch will be re-opened. Ultimately, this park plan will restore the recreational opportunities to citizens of Detroit, and give better access to the Detroit River. The Remedial Action Plan (ResAP) developed with guidance from the Michigan Department of Environmental Quality will be used to clean up the portions of the park for this disproportionately impacted low-income, minority community. Riverside Park will become an anchor for renewal and sustainable development of the targeted community by increasing the quality of life and providing walkable, bike-able green space for all residents to enjoy, especially those in southwest Detroit. It will also provide one of the few spots where Detroiters can access to the Detroit River for recreation. The expectation is that reopening the park, and the existing and planned redevelopment projects will spur economic development in the target community.

1.c Strategy for Leveraging Resources

1. c. i. Resources needed for Site Reuse: The State of Michigan has developed a \$1.6 billion plan to transform Detroit into the logistics capital of the Midwest. The new Gordie Howe International Bridge, the new Detroit Intermodal Freight Terminal, and the I-96/I-75 Gateway Project are located in southwest Detroit and are crucial economic development elements of this plan, expected to accrue multibillion-dollar benefits to the area. Included in this plan is the creation of a special logistics district and redevelopment of the Delray neighborhood, in which Riverside Park is situated. (*Detroit Free Press* 9/5/2015) The City of Detroit's 2017 Park and Recreation Improvement Plan to allocate \$6 million to restore Riverside Park's recreational amenities together with the Detroit general-funded Delray Strategic Neighborhood Plan effort to spend \$400,000 and the over \$25 million private funds invested by DTE to remediate Riverside Park Parcels 1 and 2, greatly expands the investment in economic viability for the Delray community. The five-phase Riverside Park project, including sports fields, a restroom facility, a dog park and a skate park that is under construction. An EPA Clean Up grant will enable the City to prepare Parcel 3 for investments in unique recreational amenities. Parcel 3 is located directly along the Detroit River. Restoration will provide a beautiful, unique space for picnics and gatherings. There will also be a playground, walking path, and concessions/comfort station on this portion of the property.

1.c. ii. Use of Existing Infrastructure: Riverside Parcel 3 is located near several major neighborhoods in the City of Detroit, including Southwest Detroit, Corktown, and Downtown. The current deteriorated state of the park has prevented its full use by citizens. It is the City's goal to take advantage of the existing location and infrastructure present at Riverside Park. The park is located near major highways and roads, and is serviced by all necessary utilities. DTE Energy provides electrical services to the area with no active lines on the Subject Property. The City of Detroit Public Lighting Department has underground electrical lines connected to light pole on the western portion of the site. No drinking water wells or septic systems are present on the site. However water mains are in the adjacent street and can be easily tapped into. The site's storm water disposal needs are served by the City of Detroit. Where necessary, new amenities will tap into existing utilities, including water, electric, and sewer connections for a proposed bathroom facility on the property.

2. a. Community Need

2.a.1: Community's need for funding: The communities adjacent to Riverside Park (zipcodes 48209 & 48217) are primarily low-income neighborhoods. A staggering 44% of the population and 62% of the children in these communities are considered to be living below the poverty level. More than 60% of residents are Hispanic and 23% are African American. Outdoor recreational opportunities for both children and adults in the community are limited. They

became even more limited in 2012 when the City of Detroit closed Riverfront Park due to soil contamination. Cleaning up these environmental hazards is a significant unusual expense that will further the City's efforts to create opportunities for residents to enjoy outdoor sports and experience nature along the Detroit River. In spite of Detroit's waterfront location, most residents have limited opportunities to experience fishing, boating, swimming and other water-related recreation. When improvements are complete, Riverside will be an ideal place to fish, launch a boat, play ball, or relax and read by the waterfront.

2. a.1i: Threats to sensitive populations:

1. **Health or Welfare:** In 2012, the City of Detroit closed Riverside Park due to soil contamination. In a 2017-18 environmental assessment, lead, cyanide and 1,2,3-Trichloropropane were found in surface soils and that could have adverse effects on both children and adults participating in recreational activities at Riverside. Health in southwest Detroit (zip codes 48217 & 48209) is already impacted by high levels of greenhouse gas (GHG) emissions and the highest concentration of PM2.5 in areas with the highest Latino population. Elimination of soil contamination could reduce the cumulative effects of air pollution combined with soil contaminant effects on health.

2. **Greater than normal incidents of disease and adverse health conditions.** Contamination in southwest Detroit soils is a factor in numerous health issues, including respiratory and cardiovascular issues, kidney problems and cancer. Asthma hospitalization rates in southwest Detroit and surrounding areas are almost triple the state of Michigan average. The potential of exposure was so dire that the City closed the Park in 2012.

3. **Economically Impoverished/Disproportionately Impacted Populations:** Communities adjacent to Riverside Park are primarily low-income, minority communities with multiple health challenges due in large part to environmental issues. Cleaning up environmental contamination in Riverside Park will not only limit exposure but also set the stage for the installation of recreational amenities that studies have indicated will benefit community health.

2. b i. Community Engagement

Community Engagement has been a critical element in shaping its vision for Riverside Park. For example, in 2017 when the City began to consider plans to expand 19 acre park to 30 acres, it published its plans for property acquisition, held a community meeting attended by 105 residents, and offered stakeholders other ways to submit comments.

A similar process has been undertaken in engaging residents in preparing the 2019 EPA Clean-Up proposal. The following partners have been actively engaged:

Partner Name	Point of Contact (name, e-mail, phone)	Specific Role in Project
Riverside Park Advisory Committee	Mini Ramirez, 313 - 680 - 4137 ; ramirezmi@hotmail.com	The Advisory Committee helped convene residents and create the vision and plan for Riverside Park's revitalization
Southwest Detroit Business Association	Robert Dewalsche, President 313-842-0986 x 1001; robertd@southwestdetroit.com	Conducted outreach to business and community outreach for Community outreach. Business and resident involvement
Community Push	Derrick Dykas derrickdykas@gmail.com 3130515-6626	Skateboarding organization that provided input on the skate park and other aspects of Riverside Improvements

2.b.ii. Incorporating Community Input: Input on the City of Detroit’s EPA proposal was obtained from the Riverside Park Advisory Group and other stakeholders at a meeting held on January 23, 2019 at Detroit’s Roberto Clemente Center near Riverside Park. The availability of the proposal to review and this were advertised in the *Detroit Free Press* and *Detroit News* on 1/15/2019 along with how to obtain copies of the proposal and submit comments. Flyers advertising the meeting were circulated in English and Spanish by members of the Riverside Park Advisory Committee, Recreation and Department of Neighborhoods’ staff, the office of Councilwoman Lopez and other community partners. Flyers were posted at recreation centers, libraries, schools and offices of partners and other neighborhood organizations. Copies of the proposal were available at the Robert Clemente Center, the City’s Building Safety and Engineering Department, and via a web link cited in the ads and on the flyer.

(after the meeting on the 23rd, insert info about how many people attended, feedback obtained and how valuable the feedback was in)

3. Task Descriptions, Cost Estimates, and Measuring Progress

3. a. Proposed Cleanup Plan The remedy selected will remove thirteen (13) “hot spot” areas of contaminated soils (0-1.5’) impacted with unacceptable levels of total cyanide, lead and 1,2,3-trichloropropane at Parcel 3 above the current and proposed state Generic Residential Cleanup Criteria (GRCC) for Direct Contact (DC). This involves excavation of 3,168 CY of soil posing a potential direct contact hazard and disposal of the excavated soils at a licensed landfill. Seven (7) of the “hot spots” are within the grassy areas of the park and six (6) of the “hot spot” areas are located below the existing Parking Lot. As detailed in the April 2018 RIDGTM (Remedial Investigation and Data Gap Tech Memo), the site soil profile has been divided into six distinct geological units. The uppermost layer referred to as the “sand fill” layer extends from 0-7’ below ground surface over the entire site. This “sand fill” layer is relatively “clean” fill and with the exception of the “hot spot” areas and the area under the parking lot, provides a clean minimum (as directed by MDEQ) 18” cover to protect park users from contamination located at deeper depths. Because this protective layer is missing under the paved parking lot, additional backfill material will need to be imported under the areas of the existing parking lot area that will be reduced and left to grass following restoration of the site in order to create an 18” cover and protect park users from exposure to impacted soils below 18.” The total amount of clean soil that will need to be imported, placed and compacted onsite to cover the exposed parking areas and the “hot spot” areas is approximately 7000CY. Disposal location is assumed to be a non-hazardous/Type II landfill; however, waste characterization testing will be conducted to determine the appropriate landfill type. Following removal of contaminated soils and appropriate verification sampling, the excavation will be backfilled with clean, imported sand and topsoil. The site will be stabilized by proper grading and seeding for soil erosion and sedimentation control.

Green remediation BMPs will be employed to the extent possible. Solicitation materials will include requirements to minimize total energy use, increase overall efficiency where possible, minimize emission of air pollutants and greenhouse gases; ensure adequate protection of natural resources and to conserve material resources and minimize waste. Community outreach and education will be an integral part of the cleanup grant project with ongoing periodic outreach throughout the grant period.

The ABCA was based on a Focused Feasibility Study (FFS) as informed by the RIDGTM and the Remedial Response Plan (ASTI June 2018) with an addendum (August 2018) for a soil delineation study prepared on behalf of the City of Detroit as part of their USEPA funded Site

Assessment Grant (Grant Number: BF00E01519-1) awarded September 2015 (the Grant). The City of Detroit worked closely with the Michigan Department of Environmental Quality (MDEQ) to develop the Remedial Action Plan (ResAP) that will guide the cleanup of Parcel 3. Based on the evaluation of potential relevant pathways for soil and groundwater reported in the ResAP and the stated goal for clean-up, the shallow soil direct contact (upper 1.5 feet) pathway will be addressed during the remedial activities. The remedy selected is appropriate to meet the required Michigan Natural Resource and Environmental Protection PA 451, Part 201 “due care” requirements related to protection of human health (per Part 201, Section 20107a(1)(b)), to reach the stated goal for the city to meet due care obligations in order to protect human health and re-open the park.

3.b. Description of Tasks and Activities

Task 1 – Cleanup Planning. Clean up planning will include finalizing the ABCA document, developing the cleanup work plan, fugitive dust plan, preparing the Quality Assurance Project Plan (QAPP) and permitting and development of a health and safety plan to protect workers. The cleanup work plan will be prepared based on the proposed cleanup alternative identified within the feasibility study and other documents developed during the FY15 Assessment Grant. Prior to site cleanup activities, the work plan and QAPP will be submitted to EPA for review and approval. The city will consult with MDEQ with regards to work activities. The QAPP will apply to all cleanup activities conducted under the grant. The City will procure a qualified environmental consultant through a professional services contract to carry out this work, working closely with the City to accomplish this task. Selection of an environmental professional consultant/contractor for brownfield assessment and cleanup will comply with the procurement procedures contained in 40 CFR 31.36.

Supplies (\$500) will be used for reference materials to help keep city personnel apprised of latest brownfield guidance and regulations, industry trends and recent research and legislation.

Cleanup work plan (ResAP), final ABCA, QAPP, H&S, fugitive dust plan – Contractual – \$12,000; City overview and participation in planning meetings with consultant and MDEQ and review of contracted documents; bid preparation for site cleanup activities, evaluation of bids, and selection of contractor. Travel for two BSEED-EA personnel to attend the National Brownfields meeting (\$2500 includes M&I, airfare, hotel and registration) is requested, as well as, travel for four (4) BSEED-EA personnel to attend the Michigan Environmental Compliance Conference (\$1000 includes and registration). The anticipated schedule for this task: Consultant procurement by April 30, 2020, all preliminary documents completed by Summer 2020.

Task 2 - Outreach Activity. Community outreach will be conducted by City personnel as lead and the qualified environmental consultant to present environmental assessment results and cleanup alternatives implemented at the site. The city will develop an outreach plan working closely with community leaders/groups in order to reach as many citizens as possible. This will include development of signs, flyers, attending community and district meetings, providing information via email and phone, etc. BSEED-EA will work closely with the Department of Neighborhoods and the Media Services Department to develop quality graphic materials for outreach activities. Complaints regarding cleanup activities will also be logged and addressed. Copies of meeting notes, presentations, and flyers will be added to the grant file and shared with USEPA and community members. Contractor will compile data, create presentations, handouts, and attend a minimum of 3 public meetings. The City anticipates a public kick-off meeting by late summer 2020. We will attend community meetings throughout the project year ending with a closeout meeting by late spring-early summer 2022.

Task 3 – Cleanup Action. Total requested EPA funds: \$436,742; Total Project costs: \$524,090; Cost Share: \$87,348. The qualified environmental consultant will lead the efforts to conduct cleanup activities with City personnel oversight. Site cleanup will be conducted in accordance with approved Cleanup ResAP. Contractual - \$496,590, has been allocated for cleanup activities as outlined below. This task will include verification sampling after soil removal activities are completed which will be analyzed for VOCs, SVOCs, and Michigan 10 metals. The analytical results from verification samples will be compared to applicable Part 201 Cleanup Criteria to determine whether the site cleanup objectives have been met. The city will provide quarterly reporting, MBE/WBE reporting, assistance with financial reporting, correspondence with EPA project manager and state agencies, updating ACRES, etc. Based on our estimates the cleanup budget is as follows (contractual):

\$41,470 for site preparation (includes fence \$26,000 and SESC \$5470), engineering design and permitting (\$10,000); \$15,000 for Excavation Oversight; \$5000 Excavation mobilization/demobilization/prep; \$72,900 Removal/disposal of asphalt from Parking Lot “hot spots” only, 29,160 SF @\$2.50=\$72,900; \$142,560 for soil removal, transport and landfill disposal (3168 cubic yards [CY] of contaminated soil removal at unit price \$45/CY, including excavation and landfill disposal, and granular material backfill, assuming a Type II landfill for disposal); and waste characterization for disposal (\$5000); Demarcation barrier, 57,024 SF at \$0.38/SF, \$21,641; \$140,027 for Backfill imported low permeability soil for hot spots and uncovered parking area (7001 CY of clean fill material at a unit price of \$20.00/CY, including transport, emplacements, compaction); \$8000 Post-clean up maintenance elevation survey; Post-remediation site stabilization (grading/seeding/mulch) 304,920 SF@\$0.10/SF=\$30,492.00; \$15500 Overall grant - Project Management. Estimates for soil, excavation, asphalt removal and backfill are assessed a 20% contingency. The total cost share for the Riverside Park Parcel 3 cleanup grant will be for \$87,348 and will be provided from the Detroit Parks General Fund. The full 20% cost share will be expended for this Task and will include the City removing asphalt over the hot spots in the parking lot and stabilizing the site after removal of the hot spots to prevent soil erosion. The schedule for task 3 is anticipated from August 2020 - April 2021 (this allows time for implementation of all activities, up to and including site stabilization and allows for any delays).

Task 4 – Cleanup Reporting and Closeout. Total: \$6,500. This includes the preparation of quarterly, annual financial, final cleanup action, and closeout reports. Following cleanup activities, the selected consultant will update ACRES and will be required to develop a Closure Report. \$3000 DDCC preparation and submittal to MDEQ; \$3500 Final grant report and closeout. Close out will include final report, WBE/MBE and financial closeout and will be completed as specified in the cooperative agreement by late May 2022. This also allows time for the Documentation of Due Care Compliance to be reviewed, discussed with DEQ and responses to be addressed.

3c. Cost Estimates and Outputs Cost estimates were developed based on experience with other remediation projects, literature-reported case studies, and contractor-provided estimates.

	Project Tasks for Cleanup				
Budget Categories	Task 1 – Work Plan	Task 2 - Outreach Activity	Task 3 – Cleanup Action	Task 4 – Reporting and Closeout	Total
Personnel					
Fringe Benefits					\$0

Travel	\$3500				\$3500
Equipment					\$0
Supplies	\$500	\$500	\$500		\$1,500
Contractual	\$12,000	\$3,000	\$497,590	\$6,500	\$519,090
Other					
Total Direct Costs					
Total Indirect Costs					
Total Fed Funding	\$16,000	\$3500	\$410742	\$6500	\$436742
Cost Share (20%)			\$87348		\$87348
Total Budget	\$16,000	\$3500	\$498090	\$6500	\$524090

3d. Measuring Environmental Results The City will realize the goal of this Cleanup project on the day of the ribbon cutting for this much loved community asset revitalizing a contaminated site and restoring a beautiful park for its people. The park has been closed since 2012 and public demand to re-open incentivizes the city to complete the remediation in a timely manner. BSEED-EA will measure grant progress by participating in regular meetings with the qualified environmental consultant and key city personnel; monthly progress reports will be provided to the city by the qualified environmental consultant and will track percent budget completed against percent schedule completed. BSEED will track and measure number of acres of contaminated area that are cleaned up, amount of money invested into the project and surrounding area, acres of greenspace properties created and/or preserved. BSEED will hold public comment periods during the life of the grant period to allow for community feedback regarding the progress of the grant. Progress will be measured against the outputs and milestones identified in the work plan developed under the cooperative agreement. This will be the key document in identifying outputs and the timing of those outputs. Milestones may include but are not limited to selection of consultant, development of workplan and QAPP, public meetings for project kickoff/closeout, and project closeout report. All of this information will be tracked and documented in quarterly reports to the USEPA Project Manager.

4. Programmatic Capability and Past Performance

4.a Programmatic Capability

4.a.i Organizational Structure Detroit's BSEED-Environmental Affairs project team members are highly trained, technical professionals with many years of experience. Each individual has experience with grant management, has been well trained in environmental sciences or engineering practices and participates in continuous educational opportunities to remain up to date on grant and environmental matters at the local, state and federal levels. The team has deep experience in managing EPA Brownfield Grants including workplan development, reporting and closeout protocols. Support will be contributed from other members of Environmental Affairs, associated departments and our administrative staff, as needed.

Environmental Specialist Anita Harrington will serve as the Project Manager. As Project Manager, Ms. Harrington will ensure the performance of all grant activities, professional contract services solicitation for a qualified environmental consultant, funding, reporting and environmental compliance. Key responsibilities will include day-to-day operations and project management, budget, scheduling and tracking, community outreach coordination, routine inspections, progress reporting, workplan review and updates to ACRES. Ms. Harrington will develop a programmatic workplan and schedule with other project team members' consultation. Ms. Anita Harrington is an environmental specialist with more than 25 years of professional

experience in the management of natural resource protection, environmental compliance, assessment and remediation projects.

BSEED General Manager, Mr. Paul T. Max brings more than 33 years of environmental health and industrial hygiene experience to BSEED. He has an environmental compliance background and was a RCRA compliance specialist for many years. Mr. Max will provide the expertise to assure conformance with current environmental laws, regulations and standards. Mr. Max will provide oversight of this project to ensure that all technical, administrative and financial requirements are complete within the grant timeline.

Ms. Rickelle Winton, Environmental Specialist, will assist with development of workplans, review technical reports and other technical documents, assist with public outreach, quarterly reports and ACRES. Ms. Winton is experienced in reviewing ESAs. Her background is in Chemical Engineering and she has excellent organizational skills. She will be principally responsible for cataloging and maintaining all grant associated documentation

The City of Detroit has implemented internal financial control mechanisms in order to meet or exceed all federal and state grant guidelines regarding funding allocation. By utilizing an Oracle-based financial system, we are able to track and manage all fiscal activities. Working with the Office of Departmental Financial Services and the Office of Development and Grants, BSEED will initiate the payment process beginning with the Federal Automated Standard Applications of Payment (ASAP) system and follow it through Oracle to the issuance of a check. Internal controls within the system prevent overpayments and provide various approvals to ensure appropriate spending.

4.a.ii Acquiring Additional Resources BSEED will select a Qualified Environmental Consultant in accordance with the City's approved procurement process and the competitive procurement provisions 2 CFR 200.317-200.326, as appropriate to conduct assessment activities. BSEED's overall organizational structure to manage the grant will include the project manager, project team, a Qualified Environmental Consultant, and administrative staff. BSEED's tasks will include, but is not limited to: reviewing all project reports and budgets, schedules, site inspections, field monitoring and all financial requirements of the project and grant. BSEED will also partner with the City of Detroit's General Service Department to keep the Riverside Park Advisory Board informed on cleanup activities. The Environmental Consultant will be the lead for the cleanup tasks, will assist with community meetings, and grant reporting.

4.b Past Performance and Accomplishments

4.b.i Currently Has or Previously Received an EPA Brownfields Grant BSEED is in compliance with all grant requirements, work plan, schedule and all terms and conditions of the current grant. Past grants include two FY2007 Cleanup grants which funded remediation activities at the former Sears Retail Store and Auto Service Center (Assistance #BF00E40101-01) and at former Globe Building site (Assistance #BF00E40001-0). The cleanup consisted of soil remediation through excavation and backfilling. BSEED completed cleanup activities at both sites within the schedule and budget. All of our submittals were provided on time, accepted and approved by our Region 5 project manager. BSEED expended the majority of the grant funds and achieved the expected results of the grant in a timely manner. The project was updated in ACRES and Property Profile Forms were completed and submitted at the close of the grant. Of the \$200,000 award for the Sear's site cleanup, \$199,610.17 was expended on the project. Site work was complete and the remaining funds in the amount of \$389.83 was returned to EPA. Of the \$200,000 award for the Globe Building site, \$199,843.54 was expended on the project. Site work was complete and the remaining funds in the amount of \$156.46 was returned to EPA.

BSEED was also awarded a FY15 Site-Specific Assessment Grant for Riverside Park Parcel 3 in the amount of \$350,000. With the award of this grant, assessment work was completed at Parcel 3 in 2018, additional funding in the form of a USEPA cleanup grant is being requested to remediate the site. The outputs for this grant included a Response Activity Plan (ResAP) and a Focused Feasibility Study (FFS) that will be used to guide the cleanup at the site for shallow soil impacts. Because of new state policies and approaches to address the vapor intrusion pathway, the City requested an extension for the Riverside Grant to July 2019 to allow for extension requests by MDEQ to review the final ResAP and provide approval. The City met with MDEQ in mid-December to finalize requirements for approval of the ResAP though the state's self-implementation rules do not require MDEQ approval. Based on the assessment data collected, volatilization of chemicals of concern from soil is below criteria and therefore, the ambient air inhalation pathway is not considered relevant. As an extra precaution, MDEQ requested that we provide a third ambient air pathway review using a flux chamber sampling event which will occur in summer 2019. Given the proximity to the river and associated air currents, we anticipate the results to show non-exceedance as before. No additional USEPA funds were requested. Currently, 97% of the funds have been expended and the final 3 % has been obligated.

4.b.i.1 Purpose and Accomplishments As a result BSEED's cleanup activities, Detroit Economic Development Corporation (DEGC) has implemented the Dequindre Cut Greenway through the eastern lot of the Globe Building Site. The Globe Building has been redeveloped and is operating as a State of Michigan Department of Natural Resources Outdoor Resource Center. The Sears Retail Store project cleanup was completed in less than one year of the grant cycle.

4.b.i.2 Compliance with Grant Requirements BSEED is in compliance with all grant requirements, work plan, schedule and all terms and conditions of the current grants. Past grants include two FY2007 Cleanup grants which funded remediation activities at the former Sears Retail Store and Auto Service Center (Assistance #BF00E40101-01) and at former Globe Building site (Assistance #BF00E40001-0). The cleanup consisted of soil remediation through excavation and backfilling. BSEED completed cleanup activities at both sites within the schedule and budget. All of our submittals were provided on time, accepted and approved by our Region 5 project manager. BSEED expended the majority of the grant funds and achieved the expected results of the grant in a timely manner. The project was updated in ACRES and Property Profile Forms were completed and submitted at the close of the grant.

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BSEED was also awarded a FY15 Site-Specific Assessment Grant for Riverside Park Parcel 3. This grant enabled the city to complete assessment work Riverside Park in 2018, moving the city closer to being able to remediate and reopen the park. The outputs for this grant included a Remedial Investigation and Data Gap Technical Memorandum, Response Activity Plan (ResAP), and a Focused Feasibility Study (FFS) that will be used to guide the cleanup at the site. Because of new state policies and approaches to address the vapor intrusion pathway, the City requested an extension for the Riverside Site-Specific Assessment Grant to July 2019 to allow for extension requests by MDEQ to review the final ResAP and provide approval. The grant extension was approved by EPA.