

**FY07 CERCLA Section 128(a) Tribal Response Program
Sac & Fox Nation of Missouri
Revised Approved Work Plan
Cooperative Agreement # RP98761001
05-24-07 Final**

PROJECT SUMMARY

EPA Goal 4: Healthy Communities and Ecosystems
EPA Objective 4.2: Communities (Sustain, Clean Up and Restore Communities and the Ecological Systems that Support Them)
EPA Sub-objective 4.2.3: Assess and Clean Up Brownfields
PERFORMANCE PERIOD: 04/01/06 through 06/30/08

RESOURCES:

- | | | | |
|----|--|----------|--|
| 1. | Sac & Fox Nation FTE: .5 for 15 months | \$46,525 | (Brownfield Technician) |
| 2. | Contracted Support: | \$12,430 | (environmental contractor to provide technical assistance) |
| 3. | Total CERCLA §128(a) FY Funding: | \$82,000 | |

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02/01/06 to 06/30/08 (ver. 03/05/07)**

SCHEDULE MILESTONES:¹

Draft training plan	04/30/07
Outline of inventory & database structure	05/15/07
Final Training plan	05/30/07
1st Quarterly Performance Report	05/30/07
2 nd Quarterly Performance Report	08/30/07
Complete Brownfield Inventory	09/31/07
6 month Performance Review	10/07 (month of)
TRP Fact sheet	10/30/07
3 rd Quarterly Performance Report	11/30/07
Prepare RFP and/or RFQ and start hiring process contractor	12/31/07
Public Record & Notice of Accessibly Published	12/31/07 (no later than 1/31/08)
4 th Quarterly Performance Report	03/02/08
TRP development strategy	03/30/08
Brownfield Determination Requests	03/30/08 (no later than)
12 month Performance Review	04/08 (month of)
TRP webpage	04/30/08
5 th Quarterly Performance Report	05/30/08
Phase I & II Reports	05/30/08
Performance and Budget Period Ends	06/30/08
Final Performance Report	09/28/08 (includes final quarter's performance report)
Final Financial Status Report	09/28/08

EXPECTED ENVIRONMENTAL OUTCOME: Raise awareness of Brownfield and related environmental issues within the community, identify and increase the tribal capacity to address Brownfield and other environmental cleanups in order to demonstrate good stewardship of the tribe's environmental resources and decrease risks to the health and welfare of the Sac & Fox Nation (SFN) and all others living on the reservation. Specifically, the Tribe will begin to establish a Tribal Response Program (TRP) by identifying and inventorying Brownfield properties within the boundaries of the Sac & Fox Nation (SFN), build the Brownfield expertise of tribal government and staff, and conduct preliminary outreach activities to residents of the reservation.

KEY MEASURE: Number of Acres Ready for Reuse

DEMONSTRATION OF INCLUSION OR REASONABLE STEPS TOWARDS INCLUSION OF THE FOUR ELEMENTS IN THE TRIBAL RESPONSE PROGRAM AND ESTABLISHMENT/MAINTENANCE OF PUBLIC RECORD: Not applicable (first CERCLA 128a award)

¹ While this grant was awarded on 1/30/06, this work plan and the task to be accomplished were not approved until this amendment. This amendment will extend the period of performance for 17 months. As a result, EPA acknowledges that quarterly reporting shall resume 30 days after the end of the performance quarter ending 04/30/08.

² The Environmental Director will provide oversight and management under the GAP at no cost to this grant.

A. PROJECT DESCRIPTION

The Small Business Liability Relief and Brownfields Revitalization Act (SBLRBRA) were signed into law on January 11, 2002. The Act amends the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by adding Section 128(a). Section 128(a) authorizes a grant program awarded and administered by the United States Environmental Protection Agency (USEPA) to establish and enhance state response programs that address the assessment, cleanup and redevelopment of brownfield sites and other contaminated sites as defined by the law. One goal of the funding as defined by the guidance is, "to provide funding for other activities that increase the number of response actions conducted or overseen, by a state or tribal response program. This funding is not intended to supplant current state or tribal funding for their response programs. Instead, it is to supplement their funding to increase their cleanup capacity."

The Environmental Department of the Sac & Fox Nation of Missouri (SFN), proposes to implement the work described herein. The project is expected to be implemented as a Tribal Response Program (TRP) cooperative agreement with a performance period of February 1, 2006 through June 30, 2008. The SFN will use this funding to begin to establish a TRP that results in improved environmental conditions and decreased risks to the health and welfare of the Sac & Fox Nation and all others living on the Reservation. The initial goal of the program is to inventory and ultimately assess and cleanup brownfield sites within the boundaries of the SFN Reservation, and allowable brownfields outside those boundaries as appropriate for SFN interests. This goal will be accomplished by taking reasonable steps toward establishing a TRP which includes the required four elements and a public record (see Eligibility Requirements section below). As a result of these initial steps, additional tribal needs and priorities will be defined as part of establishing the TRP. Agreement funding will be used to cover the costs of activities at or in direct support of brownfield sites as defined under CERCLA 101(39). Activities will include non-site specific tasks related to the program planning and management of the agreement and TRP; activities to take reasonable steps toward meeting the required four elements state or tribal response program including: a) the inventory of potential brownfield sites within the reservation boundaries (element 1), b) conducting TRP-related outreach activities, c) identifying the scope of the planned TRP and formulating preliminary strategies to address the required elements; and, c) establishment of the Public Record (including the development and implementation of protocols for its periodic update in accordance with CERCLA Section 128(b)(1)(C). Site-specific activities will be limited to performing a limited number of assessments at properties that EPA determines are eligible brownfields. Implementation of the proposed activities will ultimately benefit the Nation by promoting good stewardship of its resources and assist in determining the Nation's environmental priorities. The SFN Implementation of this agreement will also serve to meet USEPA's strategic goal 4.2.3 Assess and Cleanup Brownfields.

The SFN FY07 General Assistance Program grant (GAP) with EPA Region 7 includes costs and activities in support of the development of a tribal Brownfields TRP. The costs and activities within this agreement compliment but do not duplicate those included in that, or any other grant.

B. ELIGIBILITY REQUIREMENTS:

The USEPA published Grant Funding Guidance for State and Tribal Response Programs (EPA Document Number 560-F-04-266) in October 2004. The Sac & Fox Nation submitted a request for funding In January 2005 pursuant to this guidance. Through this agreement, the Sac & Fox Nation intends to begin to develop a Tribal Response Program including the four elements and public record required under CERCLA §128(a). To be eligible for future funding under Section 128(a) and as described in the guidance, a state or tribe must demonstrate that their response program includes, or is taking reasonable steps to include, the following four elements of a response program:

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1. Timely survey and inventory of brownfield sites in the state;
2. Oversight and enforcement authorities;
3. Mechanisms and resources to provide meaningful opportunities for public participation;
4. Mechanisms for approval of a cleanup plan and verification and certification that cleanup is complete.

These states or tribes must also maintain and make available to the public a record of sites addressed and proposed to be addressed by the TRP in accordance with CERCLA §128(b)(1)(C), including identifying whether the site is suitable for unrestricted use. If the site is not suitable for unrestricted use, the Public Record will identify the institutional controls relied upon in the remedy.

The Sac & Fox Nation expects that the tasks and activities conducted pursuant to this agreement will serve as a demonstration that their program is taking reasonable steps to include the four elements and that the public record requirements have been met. Activities included in this agreement are intended to serve as a basis for determining that the Sac & Fox Nation is

C: FUNDING: \$ 82,000

Funds are 100% federal dollars for the Section 128(a) State Response Program Cooperative Agreement:

The budget for this program is a total of **\$ 82,000**.

This is the first Section 128a cooperative agreement awarded to the Sac & Fox Nation of Missouri. No Superfund VCP Core or Targeted Brownfield funding has been previously awarded to the Nation. Therefore, there are no remaining funds from prior years.

Totals

Personnel	\$36,405
Fringe Benefits (27.8% of personnel costs)	\$10,120
Travel & Training	\$10,500
Equipment	
Supplies*	\$3,050
Contractual	\$12,430
Construction	0
Other	\$9,495
Indirect (%)	
TOTAL	\$82,000.00

*Supplies include office supplies and computer hardware and software purchase less than \$5,000

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Budget Narrative:

Personnel Titles	FTE %	Cost (including fringe)
Brownfields Technician	50%	\$46,525
Total	50%	

Training and Travel: \$10,500

Training: To enhance the capabilities of the tribal staff to conduct inspections and assessments and oversee clean-ups on tribal lands, and obtain training such as; The 40 hour HAZWOPER and 8-hour refresher courses, mold detection & mitigation as well as Freon removal. Staff will gain knowledge of sampling techniques, open dump clean-up methodologies, treatment technologies, restoration of ecosystems, and development of enforceable codes.

Travel: the following are tentative training/travel activities. Specific training events will be approved as part of the training plan and any updates to that plan.

- o Travel to and attendance of: Regional, National, and Tribal trainings/conferences/workshops regarding QA/QC, Tribal environmental issues of concern, Geographic information management. Locations and costs may vary. (5) Out of area trips at an average: \$1500 per trip, per person. The cost includes per diem and lodging.
- o Local travel estimated at 655 miles at \$ 0.485 a mile to reimburse staff for use of personal vehicles when tribal vehicles are not available to attend meetings, conferences, and workshops.
- o Five IROC meetings at a total of \$2500

Equipment: \$0

Supplies: Computer and software \$2,000
 To establish a new workstation with a computer for the Brownfield Tech.
 Consumable office supplies \$1,050
 Pens, paper, ink cartridges, etc...

Contractual:

Hire an environmental professional to mentor and review site-specific environmental assessment activities conducted by the brownfield technician
 Hire a licensed site professional to investigate and propose mechanisms and approaches to establishing a response program that satisfies the four elements and public record. The current cost is an estimate for actual cost, due to the uncertainty of the services needed. \$12,430

Other

- Truck Fuel (forty gallons a week, fifteen months) \$6,000
- Office space and utilities (\$22 a square foot at 60 sq ft) \$1,320
- Internet at \$45 for 15 months for 1 work station \$ 675
- Audit flat fee per grant \$1000
- Records and researching fees \$ 500

D. WORK PLAN ACTIVITIES and TIME FRAME FOR ACCOMPLISHMENT (COMMITMENTS): See Table

Task 1: CERCLA 128a Tribal Response Planning and Management

1. *Objective:* Support development and implementation of the Tribal Response Program by developing and maintaining an effective and knowledgeable workforce, efficiently conducting cross-cutting work plan activities, and managing resources under this agreement to achieve overall work plan and program objectives.
2. *Estimated the cost:* Task 1 is \$12,300
3. *Estimated the work years (FTE):* 0.15
4. *Anticipated Environmental Outcomes:*
 - a. *Short Term:* Build capacity of environmental office and tribe through increased knowledge of brownfield & CERCLA 128a related programs and issues
 - b. *Intermediate:* Establish and improve implementation of the Tribal Response Program
 - c. *Long-term:* Good stewardship of the tribe’s environmental resources and decrease risks to the health and welfare of the Sac & Fox Nation (SFN) and all others living on the reservation.
5. *Activity Matrix:* These charts, below, are intended to illustrate all of the activities for this particular task.

Activity 1.1 Program Management	
Explanation of Activity	<ul style="list-style-type: none"> • Prepare request for proposals/request for qualification (as appropriate) to hire an environmental professional to mentor and review site-specific environmental assessment activities conducted by the brownfield technician • Oversee the contractor • Solicit bids and purchase equipment (as approved in this agreement and in accordance with the award conditions) • Participate in TRP-related coordination calls and meetings with EPA, other Tribal Departments and Programs (both internal and external), the Tribe’s contractor(s) and other partners (including other federal agencies).
Outputs/Deliverables	<ul style="list-style-type: none"> • Prepare RFP and/or RFQ; allow 15 working days for EPA approval of substantive conditions. Provide documentation of the competitive process used to hire contractor (documentation of the three bids. If three bids are not received, documentation of the approaches used to solicit the bids will be necessary). • Qualifications of the Brownfield technician • A description of significant (time intensive, level of effort intensive or issues of significance) calls and meetings including information identifying who attended, when the call/meeting was held, call/meeting purpose and related outputs/outcomes as related to this agreement (include in performance report for the period in which the meeting/call occurred)
Estimated time-frame needed and targeted completion date	<ul style="list-style-type: none"> • Qualifications/Training plan for brownfield technician: submit draft to EPA by April 30th, 2007 • Prepare RFP and/or RFQ, and begin hiring process by 12/31/07
Links to Program Goals	1. Reasonable steps to include the four elements; 2. Establish and/or maintain a public record system; or 3. Other activities that increase the number of response actions conducted or overseen.

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Activity 1.2 Cooperative Agreement (CA) Administration & Reporting (Pre- and Post-Award)	
Explanation of Activity	<ul style="list-style-type: none"> • Ensure that the CA workplan and amendments are developed in accordance with EPA and Tribal policies [funded by 128a] • Ensure that budget and administrative aspects of funding requests and applications conform to Federal and Tribal policies. • Prepare and submit timely, comprehensive, and accurate reports on grant activities. At a minimum, the reports shall include monthly activity, quarterly and final performance reports to EPA (see section E), property profile forms, Financial Status Reports, MBE/WBE utilization reports, and Lobbying and Litigation Certificate.
Outputs/Deliverables	With exception of the monthly report, copies of each of the listed reports, and any other relevant reports prepared under this activity, shall be submitted to EPA as appropriate for each report. The quarterly and final performance reports may be submitted electronically as an attachment to an email directed to the EPA project officer in one of the following formats Microsoft Word, Word Perfect or Adobe Acrobat file. Reports for Tribal Council prepared used funding from this grant, shall be maintained in the Tribe's file pertaining to this grant in accordance with record keeping requirements and be available for review if requested.
Estimated time-frame needed and targeted completion date	<p>Report: Frequency (and/or) due date/Recipient</p> <ul style="list-style-type: none"> • Internal reports prepared, using funding from this grant • Quarterly Performance Report: 30 days after the end of the performance period quarter (with the exception of the final report which may be incorporated into the final performance report)/EPA R7 PO • Final Performance Report: 90 days after expiration or termination of the agreement/EPA R7 PO • Financial Status Reports (FSR): FSR within 90 days after the expiration or termination of grant support/ U.S. EPA - Las Vegas FC • MBE/WBE utilization reports: within 30 days of the end of the Federal fiscal quarter (April 30, July 30 and October 30, January 30, April 30, July 30)/EPA R7 MBE/WBE Coordinator) • Lobbying and Litigation Certificate: 90 days after the end of the project period/EPA Region 7 grant specialist • EPA Property Profiles for site specific assessments & cleanup (EPA Form 6200-03 (9-2006))
Links to Program Goals	1. Reasonable steps to include the four elements; 2. Establish and/or maintain a public record system; or 3. Other activities that increase the number of response actions conducted or overseen.

Activity 1.3 Training, Workshops, Conferences	
Explanation of Activity	<ul style="list-style-type: none"> • Develop and consult with EPA project officer on a training plan for the Brownfield technician • Implement training plan as approved. Seek approval of changes as needed. <p>The following are possible training/workshops/conferences, specific choices must be reflected in the training plan:</p> <ul style="list-style-type: none"> - Denver, CO, USEPA Region 8 Section 128a Tribal Workshop or equivalent): 1 person, brownfield technician - Tucson, AZ Western Brownfield conference (brownfield technician) - Kansas City, MO, USEPA Region 7 Tribal Grants Workshop (brownfield technician) - Detroit, MI Brownfields 2008 Conference : 3 people, ED Director, Tribal Council Member, Brownfield Technician) - TBD, ASTM Phase 1 & 2 Training (2 People) (brownfield technician & director.) - TBD, OSHA 40 hour HAZWOPER & 8 hour refreshers (brownfield technician & director) - ICEHAP web training.
Outputs/Deliverables	<ul style="list-style-type: none"> • Draft and finalized training plan • Description of the event (name, location, date, purpose and number of attendees supported by this agreement) and outputs/outcomes related to the TRP (include in quarterly report for the period in which the event takes place.)
Estimated time-frame needed and targeted completion date	<ul style="list-style-type: none"> • Draft Training plan by 04/30/07 and finalized plan by 05/30/07 • Schedule to be established in EPA approved training plan.
Links to Program Goals	1. Reasonable steps to include the four elements; 2. Establish and/or maintain a public record system: or 3. Other activities that increase the number of response actions conducted or overseen.

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Task 2: Establish the “four elements” (taking reasonable steps toward).

1. *Objective:* Undertake “reasonable steps” toward meeting the four required elements for a tribal response program under CERCLA §128a. Activities include the inventory of potential brownfield sites within the reservation boundaries, conducting TRP-related outreach activities, and, researching and formulating preliminary strategies to develop and implement a TRP appropriate to the SFN needs (include oversight or enforcement mechanisms, community notification and approval of cleanup plans and verification of cleanup completion).
2. *Estimated the cost:* \$41,000
3. *Estimated the work years (FTE):* 0.50
4. *Anticipated Environmental Outcomes:*
 - a. *Short Term:* Develop knowledge of the number/type(s) of brownfields within Tribal jurisdiction. Increased knowledge on behalf Tribal and other community members of good environmental practices.
 - b. *Intermediate:* Decrease in improper disposal or storage of wastes in community.
 - c. *Long-term:* Good stewardship of the tribe’s environmental resources and decrease risks to the health and welfare of the Sac & Fox Nation (SFN) and all others living on the reservation.
5. *Activity Matrix:* These charts, below, are intended to illustrate all of the activities for this particular task.

Activity 2.1: Develop Tribal Brownfield Inventory In order to better understand the scope of the brownfield issues faced by the Tribe an inventory of brownfields will be created. The brownfield inventory will serve as a basis for future Tribal brownfield efforts and will assist in assessing Tribal environmental priorities. This will also satisfy one of the four elements that comprise a CERCLA 128(a) response program. Identify the scope of and types of brownfields under Tribal jurisdiction.	
Explanation of Activity	<ul style="list-style-type: none"> • Outline inventory information to be collected and potential data sources: <ul style="list-style-type: none"> - Review existing Tribal Environmental Inventory and other data sources to identify potential brownfield information already collected; - Prepare outline of additional information to be collected and data source - Identify database structure - Conduct inventory: initiate contact with property owners, if necessary; conduct field work and other research, enter database - Analyze Brownfield inventory - Establish a process for periodic update (if appropriate).
Outputs/Deliverables	<ul style="list-style-type: none"> • Outline of inventory information to be collected and database structure. • Onsite demonstration of completed inventory for EPA. • Inventory report to include percentage of Reservation addressed, number and type of potential Brownfield sites identified.
Estimated time-frame needed and targeted completion date	<ul style="list-style-type: none"> • Outline of inventory information to be collected and database structure by May 15, 2007. • Completed Inventory by September 31, 2007.
Links to Primary Capacity Area (select one)	1. Reasonable steps to include the four elements; 2. Establish and/or maintain a public record system; or 3. Other activities that increase the number of response actions conducted or overseen.

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Activity 2.2 Research and Formulate Preliminary Tribal Response Program scope and strategy for developing the TRP. The TRP will be developed in a manner that satisfies the four criteria and public record requirements of CERCLA 128(a).	
Explanation of Activity	<ul style="list-style-type: none"> • Research other Tribal/State response programs including, types of sites addressed and associated contaminants, site assessment & cleanup authorities; cleanup standards, protocols, and approaches (voluntary, regulatory, etc.) • Identify the scope of the SFN TRP and the Tribe's strategy for meeting the four elements and maintaining the public record, include the estimated number of years before the four elements will be achieved (This will provide the basis for future funding).
Outputs/Deliverables	<ul style="list-style-type: none"> • List of programs researched and summary of any significant output/conclusions from that research (performance reports) • Preliminary strategy for TRP development
Estimated time-frame needed and targeted completion date	<ul style="list-style-type: none"> • List of programs researched and summary of any significant output/conclusions from that research (July 2007 – through 03/30/08) • TRP development strategy by 03/30/08
Links to Primary Capacity Area (select one)	1. Reasonable steps to include the four elements; 2. Establish and/or maintain a public record system; or 3. Other activities that increase the number of response actions conducted or overseen.

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<p>Activity 2.3 Community Education and Involvement. Raise awareness of Tribal members and community of good environmental practices, impacts of poor practices, and available resources to assist with management of waste. When site-specific brownfield assessment or cleanup activities are planned, the SFN will follow the NEPA-style community involvement.</p>	
<p>Explanation of Activity</p>	<ul style="list-style-type: none"> • Community Education • Develop and disseminate outreach materials on brownfields and/or response programs at 4 annual Tribal and community events <ul style="list-style-type: none"> ▪ Respond to community calls and concerns regarding potential brownfields ▪ Respond to Tribal Council's concerns regarding brownfields and the formulation of the TRP. • Community Involvement <ul style="list-style-type: none"> • Issue public notices of site activities & public meetings, written notifications to government agencies, adjacent property owners, etc. <p>The Brownfield technician will also develop a TRP webpage to be added to the tribal website.</p>
<p>Outputs/Deliverables</p>	<ul style="list-style-type: none"> - Track number of residents to whom information is provided (goal: reach 25 % of residents with information – include in performance reports). - Outreach materials including at least one brochure or fact sheet regarding the TRP and public record (drafts should be submitted to EPA for review, final copies to be attached to the subsequent performance report) - Copies of public notices including public notification of the availability of the TRP webpage and the public record.
<p>Estimated time-frame needed and targeted completion date</p>	<p>TRP webpage will be done by 04/30/08 Fact sheet 10/30/07 (at least one) Track number and outreach material will be done on an ongoing basis.</p>
<p>Links to Primary Capacity Area (select one)</p>	<p>1. Reasonable steps to include the four elements; 2. Establish and/or maintain a public record system; or 3. Other activities that increase the number of response actions conducted or overseen.</p>

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Task 3: Establish and Maintain the Public Record

1. *Objective:* Satisfy the requirement to establish a public record in compliance with CERCLA 128(b). The SFN TRP will define response action as clean up.
2. *Estimated the cost:* \$8,200
3. *Estimated the work years (FTE):* 0.1
4. *Anticipated Environmental Outcomes:*
 - a. *Short Term:* Increase the awareness of tribal members and others living on the reservation of brownfield-related activities.
 - b. *Intermediate:*
 - c. *Long-term:* Good stewardship of the tribe’s environmental resources and decrease risks to the health and welfare of the Sac & Fox Nation (SFN) and all others living on the reservation.
5. *Activity Matrix:* These charts, below, are intended to illustrate all of the activities for this particular task.

Activity 3.1 Develop Public Record	
Explanation of Activity	<ul style="list-style-type: none"> -Develop process for identifying and prioritizing sites to be worked on annually <ul style="list-style-type: none"> ➤ -Establish/maintain record with required information. The record will include <ul style="list-style-type: none"> ▪ A record of sites at which response actions have been completed or are planned, and, whether or not the site(s), will be/is suitable for unrestricted use. <ul style="list-style-type: none"> - Copy of the notice, regarding the public records availability and intended contents. - Demonstration of record for the EPA. - Update within no less than annually
Outputs/Deliverables	<ul style="list-style-type: none"> • Copy of notice to public regarding the purpose and availability of the public record. • Public record completed and available to public no later than January 31
Estimated time-frame needed and targeted completion date	<ul style="list-style-type: none"> • Copy of notice to public regarding the purpose and availability of the public record January 31, 2008 • Demonstration of completed record for EPA by January 31, 2008.
Links to Primary Capacity Area (select one)	<ol style="list-style-type: none"> 1. Reasonable steps to include the four elements 2. Establish and/or maintain a public record system; or 3. Other activities that increase the number of response actions conducted or overseen.

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Task 4: Site-Specific Brownfield Assessments

1. *Objective:* Complete up to three ASTM Phase 1 environmental assessments at properties in accordance with the Tribal Response Program's priorities. As funding and time allows, conduct preliminary ASTM Phase 2 environmental assessment activities.
2. *Estimated the cost:* \$20,500
3. *Estimated the work years (FTE):* 0.25
4. *Anticipated Environmental Outcomes:*
 - a. *Short Term:* Identify environmental conditions associated with brownfields to help the Tribe make informed decisions regarding the properties.
 - b. *Intermediate:*
 - a. *Long-term:* Good stewardship of the tribe's environmental resources and decrease risks to the health and welfare of the Sac & Fox Nation (SFN) and all others living on the reservation.
5. *Activity Matrix:* These charts, below, are intended to illustrate all of the activities for this particular task.

Activity 4.1 ASTM Phase I Environmental Assessments. Phase 1 investigations shall be completed in compliance with the American Society for Testing & Materials (ASTM) <i>E1527-05 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process</i> . These activities will be conducted at eligible brownfields and shall be certified by a qualified environmental professional.	
Explanation of Activity	<ul style="list-style-type: none"> - Identify and prioritize properties to be investigated - Submit necessary information to demonstrate that the property is a brownfield, to the EPA PO for approval/determination. Plan the investigation schedule to allow 45 days for EPA's determinations. - After receiving EPA's determination, conduct ASTM Phase I investigations at up to 3 brownfields. The phase I investigations must be approved by environmental professional. - Prepare and submit finalized Phase I report.
Outputs/Deliverables	<ul style="list-style-type: none"> • Tribal approach to strategizing properties • Brownfield Property Determination requests • Phase I Reports & revisions, if necessary • Property profiles for each brownfield property. Per activity 1.2. The initial profile shall be submitted upon receipt of EPA's eligibility determination and shall be updated, as appropriate.
Estimated time-frame needed and targeted completion date	<ul style="list-style-type: none"> • Brownfield Determination Requests by March 30, 2008 • Phase I Reports by May 30, 2008 • Property profiles for each brownfield property. The initial profile shall be submitted within 30 days of receipt EPA's eligibility determination and shall be updated, as appropriate, but no later than 30 days after completion of the Phase I.
Links to Primary Capacity Area (select one)	1. Reasonable steps to include the four elements; 2. Establish and/or maintain a public record system; or 3. Other activities that increase the number of response actions conducted or overseen.

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<p>Activity 4.2 ASTM Phase II Environmental Assessments: These investigations will be completed in accordance with ASTM <i>E1903-97 (2002) Standard Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process</i>. These activities will be conducted at eligible brownfields and shall be certified by a qualified environmental professional. No field investigations shall begin until EPA approves the appropriate Quality Assurance Project Plan (QAPP).</p>	
<p>Explanation of Activity</p>	<ul style="list-style-type: none"> - Submit necessary information to demonstrate that the property is a brownfield, to the EPA PO for approval/determination. Plan the investigation schedule to allow 45 days for EPA's determinations. - Plan investigation, including development of the site-specific sampling and analysis plan (SAP) & QAPP. - Prepare health and safety plan(s). <p><i>If the schedule and funding allow...</i></p> <ul style="list-style-type: none"> - After receiving EPA's determination and approval of the QAPP conduct ASTM Phase II investigations at up to two brownfields. The Phase II investigation should be conducted under the oversight of a qualified environmental professional. - Prepare and submit finalized Phase II report.
<p>Outputs/Deliverables</p>	<ul style="list-style-type: none"> • Brownfield Property Determination requests • Site-specific QAPPs & SAPs • Phase II Reports & revisions, if necessary • Property profiles for each brownfield property. Per activity 1.2. The initial profile shall be submitted upon receipt of EPA's eligibility determination and shall be updated, as appropriate
<p>Estimated time-frame needed and targeted completion date</p>	<ul style="list-style-type: none"> • Brownfield Determination Requests by March 30, 2008 • Site-specific QAPPs & SAPs (allow 30-45 days for review and approval of these documents) • Phase II Reports by May 30, 2008 • Property profiles for each brownfield property. The initial profile shall be submitted within 30 days of receipt EPA's eligibility determination and shall be updated no later than 30 days after completion of the Phase II (as appropriate).
<p>Links to Primary Capacity Area (select one)</p>	<p>1. Reasonable steps to include the four elements; 2. Establish and/or maintain a public record system; or 3. Other activities that increase the number of response actions conducted or overseen.</p>

E. Progress Reports:

The following progress report deliverables will be submitted in a timely fashion to EPA. Should comments requiring a response be received from the EPA project officer on any of the deliverables, a response shall be provided within 2 weeks of the receipt of the comments.

Quarterly Reports (in accordance with 40 CFR 31.40)

Quarterly reports will include both a narrative discussion and performance data related to accomplishments during the quarter. Specifically, the report will include information about

1. The status of tasks and deliverables agreed to in the workplan;
2. Any proposed changes to the workplan or budget (including changes made to the budget by the recipient pursuant to recipient's authority to reprogram up to 10% of the total budget during the agreement);
3. Copies of other deliverables and tangible final products created for the purposes of the funded tasks (i.e., property profiles, outreach/notice materials, copies of final regulations, procedures, forms; videos, presentations, environmental reports etc.) shall be provided as attachments or referenced as stand-alone submittals. For example the appropriate property profiles, copies of final regulations, laws, inventory, environmental reports etc. may be appropriate stand-alone submittals. If an exhibit or slide show was created or an item is too large and/or expensive to duplicate, photos or transcripts of the product may be substituted. Information publicly available on the Tribe's website may be referenced.
4. A budget summary table showing the funds expended and remaining for the reporting period with explanatory notes describing any expenditures

Final performance report (in accordance with 40 CFR 31.40)

The final performance report will provide

1. Quarterly report information for the final quarter of the project period.
2. A summation of the information required in the quarterly performance reports. The final performance report will also clearly address the items below:
 - a. An abstract or overview of the project in terms of its overall process and outcomes. Indicate which eligible activities and/or EPA criteria were addressed and how these were fulfilled;
 - b. Information on the target audience (i.e., local residents, community activists, businesses, etc.);
 - c. Description of evaluation measures and results;
 - d. Plans for dissemination of project results in terms of method of dissemination and target audience (i.e., conference presentations, educator networks, community forums, etc.);
 - e. Any problems encountered that prohibited the completion of the project goals or objectives and how they have been resolved; and,
 - f. Benefits gained by the recipient and their target audience from this program.

F. QUALITY ASSURANCE:

Collection of environmental data will be part of the implementation of the program under this agreement. At the time of this award, there was not an EPA approved Quality Assurance Project Plan (QAPP) for environmental data collection under this cooperative agreement. In compliance with 40 CFR Part 31.45 and as part of the activities necessary to establish the Tribal Response Program, the Tribe will develop and implement quality assurance practices sufficient to produce technically defensible data adequate to meet project objectives. Individual or generic Quality Assurance Project Plans (QAPPs) for activities within the scope of this agreement will be submitted for EPA approval. The tribe shall be in receipt of EPA approval for the relevant QAPP(s) prior to the collection of environmental samples. All QA documents will be prepared in accordance current EPA requirements as defined in *EPA Requirements for Quality Assurance Project Plans: EPA QA/R-5* (EPA/240/B-01/003, March 2001) and *Guidance for Quality Assurance Project Plans: EPA QA/G-5* (EPA/240/R-02/009, December 2002) or their subsequent revisions. The plans will describe the data quality objectives and the measures necessary to achieve them. Criteria will be established in each QAPP for use of field-screening analyses. The Tribe has the option of adopting the USEPA Region 7's approved *Generic Quality Assurance Project Plan for the Superfund Integrated Site Assessment and Targeted Brownfields Assessment Programs* (November 1998; (Updated: July 2005) and all the standards and practices associated with that QAPP. If adopted, site-specific addenda to this generic QAPP must be submitted and receive EPA approval prior to environmental data collection.