



**City of Toledo, Ohio  
One Government Center  
Suite 2200  
Toledo, Ohio 43610**

**U. S. Environmental Protection Agency Work Plan  
For the Brownfield Cleanup Program at 3199 Maplewood Avenue**

**Cleanup grants:**

This project supports Environmental Results Goal 3: Cleaning Up Communities, advance sustainable development, and protect disproportionately impacted low-income, minority, and tribal communities. Prevent releases of harmful substances and clean up and restore contaminated areas. Objective 3.1: Promote Sustainable and Livable Communities. Strategic measures: Assess and Cleanup Brownfields. Specifically, the recipient will carry out cleanup activities to encourage revitalization and reuse of brownfields sites. Project Period is 3 years.

CFDA: 66.818  
CERCLA Authority: 104(k)(3)  
DCN: STX  
Budget: FY 14  
Appropriation: E4  
Budget Org: 0500AG7  
Object Class: 4114  
Program Results Code (PRC): Hazardous Sub 301D79 (Action Code: OQ),  
Petroleum 301D79XBP (Action Code: OT),

**City of Toledo  
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**Project Period: 10/01/1019 - 09/30/2022**

### **Proposed Outputs and Outcomes:**

The primary expected output is the following: the grant funds will be used to complete environmental remediation of petroleum contamination at the former Chevy Transmission Plant, a 5.5-acre Site located at 3199 Maplewood Avenue in the City of Toledo.

The primary expected outcome is the eventual cleanup and redevelopment of this property, as this property is just across the railroad tracks from Overland Industrial Park (the former Jeep Assembly Plant). Plans for this 111-acre industrial park include five to seven Class A manufacturing buildings totaling 930,000 square feet. This area was the subject of an intense U.S. EPA/DOT/HUD study through the Partnership for Sustainable Communities involving a variety of public and private partners to identify and pursue opportunities this new industrial park development presents to catalyze change throughout the nearby residential and business districts

### **I. Introduction and Environmental Results**

The United States Environmental Protection Agency (U.S. EPA) has awarded the City of Toledo, Ohio, a Brownfields Petroleum Cleanup Grant to conduct remediation activities associated with the 5.5-acre former Chevy Transmission Plant located at 3199 Maplewood Avenue in Toledo. The \$127,825 grant will be dedicated to removing petroleum contamination from the Site.

This property was determined to be eligible for U.S. EPA funding through a property-specific determination made by Vern Ord, Assistant Chief, BUSTR, in a letter dated December 26, 2013. His letter stated, "At this time, under current property conditions, and based on information provided to BUSTR, the parcels appear to be eligible for Brownfield funding and the City of Toledo has the full support of the Division of State Fire Marshal – BUSTR." Mr. Ord also provided an eligibility determination in July 2013 for this same property that allowed the City to dedicate U.S. EPA Coalition Assessment grant funds to prepare the Phase I Assessment update, Phase II Assessment, and draft Analysis of Brownfield Cleanup Alternatives (ABCA) for this property.

A Phase I Property Assessment was completed in July and August 2013. This assessment was conducted in a manner consistent with the Ohio Voluntary Action Program (VAP) codified in Ohio Administrative Code (OAC) 3745-300-061 and consistent with the American Society for Testing and Materials (ASTM) Standard E 1527-05, which satisfies the All Appropriate Inquiry (AAI) Final Rule of November 1, 2005, 40 CFR Part 312. This Phase I was an update to the original Phase I prepared in 2001. A VAP Phase II Property Assessment was completed in October through December 2013.

The City of Toledo will ensure that this environmental cleanup is completed in conjunction with all applicable state and federal regulations. The Site will enroll in the Ohio BUSTR closure requirements, which has specific guidelines regarding remediation activities conducted at brownfield Sites and specific risk-based remediation goals.

The budget for this grant includes tasks for a hired environmental professional. The City will comply with the competitive procurement provisions of 40 CFR 31.36 and the City of Toledo's procurement requirements to determine the contract award for these activities. A proposed budget, including a detailed description and narrative of each task, is included with this work plan.

### **II. Project Overview**

U.S. EPA has awarded the City of Toledo \$127,825 for the cleanup of petroleum substances at the former Chevy Transmission Plant. The following tasks comprise the City of Toledo's Cleanup Grant project:

1. Procuring Environmental Consulting Services
2. Preparation of Community Involvement Plan and Implementation
  1. Preparation Final ABCA, Remedial Action Plan (RAP) Preparation, OEPA Approval and Cleanup Reporting
3. Procuring Contractor Services for UST Removal and Disposal of Petroleum Impacted Soils
4. Grant Management

### III. Management and Coordination

Marc Gerdeman will be the Project Manager for this grant. Marc has worked at the Toledo Division of Environmental Services for 8.5 years and is a trained environmental professional with experience in brownfield assessment and remediation activities, procurement for professional services and contractors, project oversight, document management, and public outreach activities.

### IV. Work to be Performed

The schedule presented in the task tables below assumes that the cooperative agreement with U.S. EPA will be executed by August 1, 2014.

#### *Task 1: Procuring Environmental Consulting Services*

The City of Toledo has the ability and professional expertise to manage this grant through its use of City staff, hired consultants, and support from U.S. EPA. The City will complete competitive procurement practices compliant applicable federal procurement rules (2 CFR part 200) and in accordance with the City's procurement process, to solicit and secure a qualified environmental consultant to oversee remediation activities. The City will require that the selected consultant has previous experience implementing U.S. EPA cleanup grants.

<b>Task 1: Procuring Environmental Consulting Services</b>		
<b>Activities</b>	<b>Deliverables</b>	<b>To be Completed by</b>
Prepare Request for Qualifications (RFQ) for qualified consultant	Submit RFQ to USEPA review	30 days after Cooperative Agreement award (10/1/19)
Advertise RFQ (Public Notice and send to interested parties)	Provide USEPA with a copy of published RFQ	
Review and evaluate RFQs, select consultant	Notify USEPA about selections	
Contract with consultant	Signed contract from City	
Prepare QAPP Equivalency Memo	Provide USEPA with a copy of QAPP Memo	

#### *Task 2: Preparation of Community Involvement Plan and Implementation*

A community involvement plan will be prepared to establish a process to gain public input, share project updates and to establish a public repository for project documents that are part of the Administrative Record. The City will seek input from the community about the draft ABCA and planned activities and will incorporate appropriate considerations into plans.

<b>Task 2: Community Involvement Plan and Implementation</b>		
<b>Activities:</b>	<b>Deliverables:</b>	<b>To be Completed by:</b>
Designate a community relations spokesperson	Report to USEPA contact information	
Prepare Community Relations Plan (CRP) and submit to USEPA	Provide USEPA a copy of the CRP	
Finalize and implement CRP and establish an Administration Record (AR) repository (library)	Quarterly progress report	

***Task 3: Preparation of Final ABCA, Remedial Action Plan Preparation and Cleanup Reporting***

A draft ABCA will be prepared that identifies the objectives of the environmental response action and provides an analysis of cleanup alternatives. This report will document that the situation meets the need for an environmental response action and will provide information on the site background, threats to public health and/or the environment posed, and projected costs. It will identify the proposed action and explain the rationale for its selection. Following the public comment period, incorporation of public feedback, and review/approval of the final ABCA by U.S. EPA, the City and its consultant will develop and submit a Remediation Plan to U.S. EPA for approval. This plan will specify activities to remove two USTs and impacted soils, to establish confirmatory sampling requirements, and to require integration of offsite borrow material. These details will be incorporated into bid specifications for use in contractor procurement. A site-specific health and safety plan (HASP). The consultant will work under a U.S. EPA-approved QAPP. Once cleanup is completed, the consultant will prepare a report documenting cleanup activities and verifying that cleanup is complete and protective of human health and the environment. If appropriate, it will identify whether institutional controls were used and any long-term monitoring requirements. This closeout documentation will be submitted to U.S. EPA for review/approval.

<b>Task 3: Preparation of ABCA, RAP, OEPA Approval and Cleanup Reporting</b>		
<b>Activities:</b>	<b>Deliverables:</b>	<b>To be Completed by:</b>
Prepare draft ABCA and RAP (enroll site in OEPA MOA track)	Notification	
Submit draft ABCA to USEPA for review/comment and RAP to OEPA for review/comment	Copy of ABCA sent to USEPA and any remedial design documents submitted to OEPA for review	
Issue public notice of availability of draft ABCA and RAP documents and start 30-day comment period	Copy of public notice sent to USEPA	
Host public meeting to discuss proposed cleanup plans and to solicit comments	Sign in sheet for public meeting sent to USEPA	
Revise ABCA and RAP as necessary based on comments. Receive OEPA approval letter. Include in AR	Submit copies to USEPA	
Prepare bid specifications	Submit copy to USEPA	

**Task 4: Procuring Contractor Services for UST Removal and Disposal of Petroleum Impacted Soil**

Contractors will be selected in accordance with the City’s procurement practices. The construction manager will oversee activities to ensure that work progresses as planned, develop punch lists, and perform contract closeout. The budget assumes: (1) Removal, transport and disposal of 810 tons of petroleum-impacted soils from four areas; (2) Removal, transport, disposal and reporting of the 12,000 gallon tank (\$30,000) and 500 gallon tank; removal, transport and disposal of an estimated 325 tons of petroleum impacted soils from UST areas; (3) Removal/management of concrete foundation to allow access to remediation areas, transport clean material to the property, backfill excavated areas with clean soil, and complete grading/compaction activities for filled areas. (4) Complete remediation oversight and confirmatory sampling activities at excavated areas; (5) Secure contracts, manage project, oversee activities, and complete reports for U.S. EPA.

<b>Task 4: Procuring Contractor Services for Remediation</b>		
<b>Activities</b>	<b>Deliverables</b>	<b>To be Completed by</b>
Prepare draft Request for Quotations for Contractor Services (RFQ)	Notification	
Advertise RFQ (Public Notice and send to interested parties)	Provide USEPA with a copy of published RFQ	
Review and evaluate RFQ. Select contractor(s)	Notify USEPA about selection	
Award Contract(s)	Signed contract from City	
Develop Health and Safety Plan	Copy sent to USEPA for review/approval	
Successfully complete all remedial activities (Cleanup)	Updates will be listed in the quarterly report	
Complete cleanup closeout documents and receive completion notification from OEPA	Submit documents to state and USEPA	

**Task 5: Grant Management**

Marc Gerdeman, the City’s Project Manager, will oversee grant management tasks. However, report preparation and routine communication with the U.S. EPA project manager will be assigned to the environmental consultant selected for the project.

Quarterly reports for quarters will be prepared. The quarterly reports will describe progress on each defined task in this Work Plan. The Annual Financial Report and the Annual Disadvantaged Business Enterprise (DBE) Report will be prepared in October of each year.

This task also includes general communication with U.S. EPA about the grant.

<b>Task 5: Grant Management</b>		
<b>Activities</b>	<b>Deliverables</b>	<b>To be Completed by</b>
Prepare Quarterly Reports	Quarterly Reports submitted to EPA via email	Within 30 days of end of each quarter: April 31, July 31, October 31, and January 31.

Prepare Annual Federal Financial Reports.	Annual Financial Reports	October 31 of each year
Prepare Annual DBE Report	Annual DBE Reports	October 31 of each year
Enter site specific cleanup info into EPA ACRES Database	Complete ACRES Work Package	Enter data upon initiation of cleanup and update as necessary

**Remediation Goals for the Project**

Phase II investigations identified the presence of two underground storage tanks (USTs) estimated at 12,000 gallons and 500 gallons. Three concentrations of total petroleum hydrocarbons exceeded residual soil saturation values. One concentration of lead exceeded its respective VAP direct contact standard for construction/excavation activities. The City’s consultant estimates that 1,135 tons of petroleum and lead impacted soils within the two UST areas and four separate areas need to be removed and appropriately disposed of to meet Ohio VAP standards and to protect human health and the environment. A combination of generic numerical standards and risk-derived standards will be used to demonstrate that post-remedy conditions meet the applicable standards for commercial/industrial property use for all complete and potentially complete on-property and off-property exposure pathways.

**V. Budget**

	Task 2: Community Involvement	Task 3: Final ABCA/ Cleanup Plans	Task 4: Remediation	<b>Total</b>
Personnel	\$0	\$0	\$0	\$0
Equipment	\$0	\$0	\$0	\$0
Supplies	\$500	\$500	\$0	\$1,000
Contractual	\$6,000	\$27,500	\$93,325	\$126,825
Federal Funding	\$6,500	\$28,000	\$93,325	\$127,825
Cost Share	\$1,000	\$1,000	\$28,100	\$30,100
Total Budget	\$7,500	\$29,000	\$121,425	\$157,925

**Task 2: Preparation of Community Involvement Plan and Implementation**

We budgeted \$6,000 for consulting time to assist with plan preparation and implementation and \$500 in supplies to help cover the costs of public notices in the local newspaper. *The City’s in-kind cost to help prepare the plan and to implement outreach activities (\$1,000).*

**Task 3: Preparation of Final ABCA, Remediation Plan Preparation and Cleanup Reporting**

The breakdown for consultant costs for these activities is: ABCA (\$9,000), Remedial Work Plan (\$4,000), bid specifications (\$6,500), SWPPP and HASP preparation (\$5,000), and cleanup reporting (\$3,000) = \$27,500 for contracted services. It includes \$500 in supplies to help cover costs to publish public notices. *The City’s in-kind cost to oversee this process and review documents (\$1,000).*

#### ***Task 4: Remediation***

The budget assumes: (1) Removal, transport and disposal of 810 tons of petroleum-impacted soils from four areas at the local market rate of \$35/ton = \$28,350 contractor costs; (2) Removal, transport, disposal and reporting of the 12,000 gallon tank (\$30,000) and 500 gallon tank (\$16,000); removal, transport and disposal of an estimated 325 tons of petroleum impacted soils from UST areas at \$35/ton = \$11,375; \$57,375 contractor costs; (3) *Removal/management of concrete foundation to allow access to remediation areas (\$1,000), Cleanup of the Former Chevrolet Transmission Plant in Toledo, Ohio Former Chevrolet Transmission Plant transport clean material to the property, backfill excavated areas with clean soil, and complete grading/compaction activities for filled areas. Backfill material management activities assume equipment and personnel costs rolled into a local market rate of \$20/ton (includes the value of the clean material sourced from other city activities) for 1,255 tons (810 tons from four cleanup areas, 325 tons from UST excavated areas and 120 tons from UST void areas) = \$25,100; \$26,100 for match-dedicated City-owned equipment and personnel time;* (4) Complete remediation oversight and confirmatory sampling activities at excavated areas = \$7,600 contractor costs (5) *Secure contracts, manage project, oversee activities, and complete reports for U.S. EPA the City's in kind cost (\$2,000).*