

PUEBLO BROWNFIELDS ASSESSMENT WORK PLAN
City of Pueblo, Colorado
EPA Grant Period October 1, 2020 – September 30, 2023
Revised – January 20, 2023

The Pueblo Brownfields Assessment Work Plan (the Work Plan) supports the United States Environmental Protection Agency (U.S. EPA) Strategic Plan,¹ per the CERCLA² Section 104(k) Assessment Cooperative Agreement, and CFDA³: 66.818 Assessment, Cleanup, and Revolving Loan Fund Grants.

While sites may be considered anywhere within Pueblo County, determination of priority sites will gravitate to the target area. Pueblo's downtown and riverfront – the oldest area of the city – is the target area for this project. This target area has a long and diverse industrial past including power plants, rail industry, coal yards, filling stations, printing companies, and more. These historic uses indicate potential environmental contamination.

Within downtown Pueblo lie three sub-areas of focus, as follows.

The heart of downtown, rich with historic assets and prime opportunities for historic adaptive redevelopment and reuse. Home to beautiful historic buildings, recreational assets like the Riverwalk, a walkable retail and entertainment district, and a convention center. These features make redevelopment of properties in the target area – once environmental issues are addressed – both attractive and feasible.

The western section of downtown, which has historically been home to industrial and rail sites and holds promise for mixed-use infill development, including much-needed new housing. The 400 blocks of West 2nd and 3rd Streets are situated along former rail lines. The 1905 Sanborn maps show uses including the Pueblo Lumber & Coal Yard, the Double Dick Mine Coal Yard, a filling station, and a motor freight station. Environmental concerns include the potential for both petroleum and hazardous substances contamination

The decommissioned Pueblo Power Plant and surrounding sites, which are of interest to create an industrial heritage destination including a rail-themed hotel, expansion of Pueblo's Historic Arkansas Riverwalk, restaurants, shops, offices, and housing. The Pueblo Power Plant is situated on West D Street northwest of South Victoria Avenue. The 1883 and 1886 Sanborn Fire Maps show uses as Continental Oil & Transport and Sheldon Lumber Yard. The 1905 Sanborn Map shows Southern Colorado Power company on the property. Environmental concerns include the potential for both petroleum and hazardous substances contamination.

This revision of the Pueblo Brownfields Assessment Work Plan was prompted by an opportunity to work in cooperation with the Black Hills Energy (BHE), the owner of the decommissioned Pueblo Power Plant (the Property) to prepare a redevelopment plan for the Property and adjoining parcels. The Property is within one of the Target Areas and is a Priority Site in Pueblo's original grant application, and is in the downtown business district and adjoins the Historic Arkansas Riverwalk of Pueblo (HARP).

The revision of the Work Plan includes the reassignment of \$69,900 of grant funds from the Environmental Assessments Task (Task 3) to a new task for Redevelopment Planning (Task 5) that will be undertaken by Partners Environmental Consultants, Inc. (Partners) and their sub-consultant for planning, Connect One Design (C1D). The purpose of the reassignment of funds is to complete a Brownfield Master Plan for the Property which will consider realistic reuse, the community vision, economic impacts, the real estate market, economic and environmental conditions. The Master Plan will

¹ U.S. EPA. (2019.) FY 2018-2022 Strategic Plan. Retrieved June, 2020: <https://www.epa.gov/sites/production/files/2019-09/documents/fy-2018-2022-epa-strategic-plan.pdf>

² CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act, known also as Superfund.

³ CFDA: Catalog of Federal Domestic Assistance

also be used to support later efforts to pursue additional funding from the US EPA for a Brownfield Cleanup grant at some future time.

Furthermore, after a great deal of public involvement, the Power Plant 5 & 6 buildings were designated a Local Historic Landmark in 2018. BHE is working with the City of Pueblo to explore redevelopment opportunities that would facilitate the energy provider’s desire to relocate their operations in a responsible way and consistent with the requirements of the Public Utilities Commission of Colorado. Repurposing this property has proven to be a challenge to the City with several failed attempts. BHE and the City hope that this new public/private partnership to develop a feasible area-wide plan for the site will facilitate its eventual redevelopment. Although the public has been significantly involved in prior development efforts and through the completion of extensive planning projects in adjoining areas like the HARP, a public meeting will be conducted as part of this effort to present the 90% Master Plan to the Community and obtain feedback to be included in the final version of the Master Plan.

The revision of the Pueblo Brownfields Assessment Work Plan also includes the reassignment of \$18,950 of grant funds from the Environmental Assessments Task (Task 3) to the Community Engagement Task (Task 1). The purpose of the reassignment is so the City can enlist the help of Partners in identifying and contacting candidates for stakeholders to participate in a Brownfields Advisory Committee (BAC). Over the course of the coming year, Partners will prepare agendas, attendance sheets, schedule, and participate in meetings of the BAC every two (2) months, while assisting the City with scheduling, publicizing, and presenting two (2) semi-annual meetings that are open to the public.

1. GOAL: A CLEANER, HEALTHIER ENVIRONMENT

2. OBJECTIVE: REVITALIZE LAND AND PREVENT CONTAMINATION

The City of Pueblo will launch a comprehensive Brownfields program, evenly focused on hazardous substances and petroleum sites, for assessment within key areas of downtown. The purpose of this work is to create a healthier and more economically viable Pueblo, and to eliminate blight. The areas have potential value to the economic development of the city. Western downtown, with its former industrial and rail sites, would be ideal for mixed-use redevelopment. The adjacent central business core, with its historic buildings, would be attractive and feasible for renovation and occupancy. Large vacant schools just outside the downtown core often present a significant safety hazard in their current condition but offer a significant redevelopment opportunity that will benefit the community. Tasks will include community engagement, inventory, environmental site assessment, remedial planning, and program management.

3. FUNDING:

Total funding of the program is \$300,000. That includes \$150,000 for Hazardous Substances and \$150,000 for Petroleum.

4. BUDGET:

The total costs estimated for the project must agree with the amounts contained in the Application for Federal Assistance Budget Page (Form 424a).

Table. Budget
Hazardous Substances and Petroleum

Budget Categories	Project Tasks						Total
	Community Engagement	Brownfields Inventory	Environmental Assessments	Remedial Planning	Redevelop. Planning	Program Mgmt/Reporting	

Budget Categories		Project Tasks						Total
		Task 1	Task 2	Task 3	Task 4	Task 5	Task 6	
Direct Costs	Personnel							
	Fringe Benefits							
	Travel ⁴						\$3,110	\$3,110
	Equipment ⁵							
	Supplies							
	Contractual	\$26,150	\$9,600	\$159,240	\$32,000	\$69,900		\$296,890
	Other							
Total Direct Costs ⁶		\$26,150	\$9,600	\$159,240	\$32,000	\$69,900	\$3,110	\$300,000
Indirect Costs								
Total Budget		\$26,150	\$9,600	\$159,240	\$32,000	\$69,900	\$3,110	\$300,000

⁴ Travel to Brownfields-related training conferences is an acceptable use of these grant funds.

⁵ EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for Brownfield Grants.

⁶ Administrative costs (direct and/or indirect) for the Assessment Grant applicant itself cannot exceed 5% of the total EPA-requested funds.

5. WORK PLAN TASKS

Anticipated Project Schedule (Revised January 2023)														
Tasks and Activities	Quarters													
	1	2	3	4	5	6	7	8	9	10	11	12		
<i>1 Community Involvement</i>														
<i>1.1 ID stakeholders</i>														
<i>1.2 Establish and Convene BAC</i>														
<i>1.3 Develop and deploy communications plan</i>														
<i>2 Brownfields Inventory</i>														
<i>2.1 Build inventory</i>														
<i>2.2 Prioritize sites</i>														
<i>2.3 Re-evaluate priorities</i>														
<i>3 Site Assessments</i>														
<i>3.1 Phase I ESAs</i>														
<i>3.2 Phase II ESAs</i>														
<i>4 Remedial Planning</i>														
<i>4.1 Remedial and reuse plans</i>														
<i>4.2 Cost estimates</i>														
<i>5 Brownfield Redevelopment Planning</i>														
<i>5.1 Gather Data and Input from Stakeholders</i>														
<i>5.2 Prepare Master Plan</i>														
<i>6 Program Management</i>														
<i>6.1 Issue RFP/select QEP</i>														
<i>6.2 Quarterly reports</i>														
<i>6.3 Financial reports</i>														
<i>6.4 Final report</i>														
<i>6.5 ACRES entries</i>														

The following tables contain three columns:

1. Tasks descriptions.
2. Anticipated Outputs (projected activities, deliverables, reports), and Anticipated Outcomes (projected results, effects, improvements).
3. Anticipated Accomplishment Date(s) (Quarter(s)).

Task 1: Community Engagement

Task 1 – Community Engagement	Outputs and Outcomes	Anticipated Date(s)
<p>These activities will be monitored by the City of Pueblo’s community engagement planner and conducted by a qualified environmental professional.</p>		
<p>Identify Key Stakeholder Groups and Leaders:</p> <ul style="list-style-type: none"> • Deploy methods from the 2017 Public Participation Plan, (which was adopted by the Pueblo Area Council of Governments for Transportation projects but can serve as guidelines for any project). 	<p>Outputs:</p> <ul style="list-style-type: none"> • A Brownfields Advisory Committee (BAC) will be formed from the Key Stakeholders that will meet every two (2) months generating meeting agendas, attendance lists, and meeting notes. • The BAC meetings will be hosted in person and remotely by the City and the City’s environmental consultant. <p>Outcomes:</p> <ul style="list-style-type: none"> • An active and motivated work group driving Brownfields initiatives. • Meaningful community engagement that is effective without being over-complicated. • Meaningful participation from members underrepresented and from hard-to-reach groups/communities. 	<p>Q10</p>
<p>Establish and Convene a Brownfields Advisory Committee (BAC):</p> <ul style="list-style-type: none"> • Select certain stakeholders for BAC; invite Historic Arkansas Riverwalk of Pueblo (HARP) Authority, Pueblo Department of Public Health & Environment, Pueblo Downtown Association, Pueblo Historic Preservation Commission, Latino Chamber of Commerce, Iron Phoenix Corporation, and Rocky Mountain Realty. • Hold local public meetings to discuss Phase I site identification and assessments, Phase II site results, and potential cleanup and redevelopment plans. • Ensure that commitments made by the BAC in proposal are implemented. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Assemble a BAC represented by broad, inclusive stakeholders, including residents, property owners, and business owners in the target areas; real estate, lending, economic development, and public health professionals; environmental and watershed organizations; and neighborhood organizations. • Hold BAC meetings every two (2) months generating meeting agendas, attendance lists, presentations, and meeting notes. • The City will publicize and host semi-annual public meetings (two [2]) assisted by the City’s environmental consultant. The public meetings will generate agendas, attendance lists, presentation materials, and meeting notes. <p>Outcomes:</p> <ul style="list-style-type: none"> • Engage an active and motivated work group driving Brownfields initiatives. • Encourage public participation and support of related projects. 	<p>Q10-Q12</p>

<p>Develop and Deploy Communications Plan:</p> <ul style="list-style-type: none"> • Create Internet site to involve private and public property owners, lenders, and developers. • Create fact sheets and Frequently Asked Questions (FAQs). • Update project Internet site. • Meet with local community organizations and inform elected officials. • Publish program information in local papers and post notices in town halls and community centers. 	<p>Outputs:</p> <ul style="list-style-type: none"> • An easy to navigate and attractive website, fact sheets on major sites, FAQs. • Communications Plan. • Commitments from Community-Based Organizations (CBOs), • Social media (e.g., Facebook page). • Presentations at semi-annual meetings hosted at a variety of locations, including the affected neighborhoods. • A minimum six rounds of ads/postings in local target areas. <p>Outcomes:</p> <ul style="list-style-type: none"> • Methods deployed from the Pueblo Area Council of Governments (PACoG) 2017 Public Participation Plan. • Up-to-date engagement tools to educate about project work, disseminate information, and involve stakeholders. • Property owners knowledgeable about Brownfields process and benefits. • Translation services offered upon request. • Improved community knowledge on related issues and identification of potential sites. • Direct effort to meet needs and desires of community. 	<p>Q10-Q12</p>
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Task 2: Brownfields Inventory

Task 2 - Brownfields Inventory	Outputs & Outcomes	Anticipated Date(s)
<p>These activities will be monitored by the City of Pueblo’s project manager and conducted by a qualified environmental professional.</p>		
<p>Build Brownfields Inventory Based on Community Engagement and Input:</p> <ul style="list-style-type: none"> • Begin with priority sites identified in grant application: Pueblo Power Plant, 400 blocks of West 2nd and 3rd Streets along former rail lines, and redevelopment of historic downtown buildings. • Identify recognized and potential Brownfields sites in target areas. • If necessary, gather additional sites in the City and County of Pueblo. • Enter sites on Geographic Information Systems (GIS) mapping tool and the Brownfields Inventory Tool (BiT). 	<p>Outputs:</p> <ul style="list-style-type: none"> • Spreadsheet and map of potential sites. <p>Outcomes:</p> <ul style="list-style-type: none"> • BiT utilized. • Graphical capturing of sites for planning and marketing work. 	<p>Q2-Q3</p>

Task 2 - Brownfields Inventory	Outputs & Outcomes	Anticipated Date(s)
<p>Prioritize Brownfields Sites with Community Input:</p> <ul style="list-style-type: none"> • Advise property owners who are interested in property assessments. • Convene BAC and public meetings to rank and prioritize sites. • Choose initial sites for Phase I investigation. • Evaluate site access issues. • For each selected site, provide site eligibility information to EPA (or State for petroleum sites) for review. • Obtain EPA (or State) site eligibility approval document for Phase I. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Planning and open-house meetings; have nine eligible sites identified in initial inventory search. • Six (6) or more additional eligible sites identified during remainder of grant. <p>Outcomes:</p> <ul style="list-style-type: none"> • Fifteen or more Brownfields sites identified eligible with the highest redevelopment and community benefit potential in target area(s). 	Q3
<p>Re-Evaluate Priority List:</p> <ul style="list-style-type: none"> • Identify a brownfield-impacted area (neighborhood, district, city block, etc.). • Have public engagement identify additional sites as funds allow. • Develop strategies for the reuse of existing infrastructure in the area(s). 	<p>Outputs:</p> <ul style="list-style-type: none"> • Produce a plan for the brownfield impacted area. • Create a set of scalable strategies for assessment, cleanup, and reuse measures for targeted sites and other sites. • Create a map and list of prioritized sites. <p>Outcomes:</p> <ul style="list-style-type: none"> • Identification of future uses of at least nine (9) properties in the area-wide plan. • Identification of next steps to implement the plan, including clean-up appropriate for alternate land uses. 	Q7, Q11

Task 3: Environmental Site Assessments

Task 3 – Environmental Site Assessments	Outputs and Outcomes	Anticipated Date(s)
<p>These activities will be monitored by the City of Pueblo’s project manager and conducted by a qualified environmental professional.</p>		
<p>Phase I ESAs:</p> <ul style="list-style-type: none"> • Conduct planning meeting to discuss approved sites. • Obtain access agreement and perform Phase I investigation. • Submit draft Phase I report to project manager. • Review/comment on draft Phase I. • Prepare Phase I AAI Checklist for EPA. • Submit final Phase I report to project manager. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Planning meetings. • Ten Phase I Reports. • Updated Assessment, Cleanup, and Redevelopment Exchange System (ACRES) database. <p>Outcomes:</p> <ul style="list-style-type: none"> • Ten high potential Brownfields sites assessed through Phase I. • Noted number of acres assessed through Phase I. 	Q2-Q12

Task 3 – Environmental Site Assessments	Outputs and Outcomes	Anticipated Date(s)
<p>Phase II ESAs:</p> <ul style="list-style-type: none"> • Meet with BAC to review Phase I results and project direction. • Proceed with Phase II based on QEP’s findings and recommendations • Plan Phase II. • Maximize efficiencies and minimize negative impacts of site assessments by incorporating Green and Sustainable Remediation (GSR) techniques that are applicable to Phase II assessment activities. • Submit draft site-specific Quality Assurance Project Plan (QAPP) addendum to project manager for review and comments. • Obtain EPA/State approval for final site-specific QAPP. • Perform field work according to plan. • Project manager monitors site work and communicates any concerns with EPA/State. • Project manager tracks GSR site assessment efforts used during Phase II investigations. • Submit draft Phase II report to project manager for review and comments. • Submit final Phase II report to project manager. • BAC evaluates Phase II findings and decides on appropriate path forward, (options may include supplemental assessment if warranted, remedial planning, land-use restrictions without cleanup, etc.). 	<p>Outputs:</p> <ul style="list-style-type: none"> • Project planning meetings. • One approved generic QAPP. • Three (3) or more sites approved for Phase II Investigation. • Approved site-specific QAPP Addenda (delineating extent of site contamination on one Brownfield site) for each site approved for Phase II investigation. • Phase II report(s) documenting the results. • Updated ACRES database. • GSR efforts reported in quarterly reporting. <p>Outcomes:</p> <ul style="list-style-type: none"> • Three (3) or more high priority sites identified for further investigation and potential redevelopment. • Three (3) or more high priority sites with complete Phase II assessments that are ready for cleanup and reuse planning. • GSR sustainable site assessment techniques. 	<p>Q4-Q12</p>

Task 4: Remedial Planning

Task 4 – Remedial Planning (Commitments)	Outputs and Outcomes	Anticipated Date(s)
These activities will be monitored by the City of Pueblo’s project manager and conducted by a qualified environmental professional.		
<p>Complete remediation and reuse plans and cost estimates:</p> <ul style="list-style-type: none"> • Throughout Phase II process, strategize with BAC on reuse plans for the site. • Conduct further stakeholder outreach to leverage developer/lender interest in the property. • Develop draft cleanup alternatives and remediation plans for the site. • Perform public outreach and involvement in cleanup and reuse planning. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Three (3) or more internal cleanup and reuse planning meetings. • At least three (3) draft cleanup alternative plans with cost estimates. • GSR language in cleanup plan. • Updated ACRES database. • One of the public meetings (Task 1) will include a summary and discussion of the cleanup plans, findings, and recommendations. • Potential for developer/lender workshop and transaction forum. <p>Outcomes:</p> <ul style="list-style-type: none"> • Three (3) or more properties assessed through cleanup and reuse planning and ready for cleanup and redevelopment. • Land or buildings ready for cleanup and infill or redevelopment using available economic incentives. • Sustainable redevelopment encouraged to use clean energy and efficiency. 	Q6-Q12

Task 5: Redevelopment Planning

Task 5 – Redevelopment Planning (Commitments)	Outputs and Outcomes	Anticipated Date(s)
These activities will be monitored by the City of Pueblo’s project manager and conducted by a qualified environmental professional.		
<p>Complete remediation and reuse plans and cost estimates:</p> <ul style="list-style-type: none"> • Identify and hire a professional planning firm to work with the environmental consultant. • Meet with City of Pueblo planning staff and the representatives from BHE (stakeholders) separately to review and obtain background documents, GIS data, and establish document sharing and communication strategies. Listen to and discuss initial re-use programming ideas and interests. • Review background documents from previous planning efforts. 	<p>Outputs:</p> <ul style="list-style-type: none"> • One remediation and reuse plan with cost estimates for one site. • A GIS aerial base map with historic and present day conditions and a remediation overlay. • Meeting minutes from separate meetings with stakeholders. • A draft 60% Master Plan and Phasing Strategy. • Meeting minutes from presentation of 60% Master Plan. • 90% Master Plan and 90% Master Plan Report. 	Q6-Q12

Task 5 – Redevelopment Planning (Commitments)	Outputs and Outcomes	Anticipated Date(s)
<ul style="list-style-type: none"> • Identify historic and existing buildings/structures on the Property and prepare a list of such buildings and equipment as well as the estimated extent of remediation to be considered in the master plan. • Conduct a site walk of the Power Plant 5 & 6 Building to view the current condition of the Property as it pertains to making a decision between the demolition or renovation of interior structures and the building at the Property. • Compile a 60% Master Plan that represents the ideal development plan with full consideration of the environmental assessment for stakeholder review, discussion, and revision. • Address comments and concerns pertaining to the 60% Master Plan. • Create a 90% illustrative Master Plan that highlights the proposed land use opportunities and provide the public access to the 90% Master Plan via the City’s website. • Conduct one (1) public meeting (independent of Task 1) that provides an overview of the 90% Master Plan and opportunity for discussion and for public input. • Incorporate public input as appropriate in the final version of the Master Plan. 	<ul style="list-style-type: none"> • Review 90% Master Plan and Report with stakeholders. • The City will host a public meeting (independent of Task 1) to review the 90% Master Plan and solicit input from the community. • Updated ACRES database. <p>Outcomes:</p> <ul style="list-style-type: none"> • Plan for site redevelopment to form basis of conducting additional assessments. • Position the site for a site assessment or cleanup grant in future US EPA or CDPHE funding rounds. • Consolidate past planning efforts in a single document. • Incorporate public input into final Plan. 	

Task 6: Program Management and Reporting

Task 6 – Program Management and Reporting (Commitments)	Outputs & Outcomes	Anticipated Date(s)
<p>These activities will be conducted by the City of Pueblo’s project manager, with assistance from a qualified environmental professional.</p>		
<p>Issue Request for Proposal (RFP) and select Qualified Environmental Professional (QEP):</p> <ul style="list-style-type: none"> • Prepare RFPs, evaluate applications, conduct interviews, hire a licensed QEP) familiar with the Brownfields program and requirements to assist the City through the project. • Conduct annual performance evaluations of the QEP. 	<p>Outputs:</p> <ul style="list-style-type: none"> • RFP, documentation of meeting of open competition, award and contract for scope of services. • Performance evaluation reports and applicable corrective actions. <p>Outcomes:</p> <ul style="list-style-type: none"> • High quality products and services to meet project needs. 	<p>Q1-Q2</p>

Task 6 – Program Management and Reporting (Commitments)	Outputs & Outcomes	Anticipated Date(s)
	<ul style="list-style-type: none">• Maintaining a high level of work effort.	

<p>Complete quarterly program reports and submit to EPA:</p> <ul style="list-style-type: none"> • Prepare quarterly reports. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Accurate and complete files suitable for program evaluation. <p>Outcomes:</p> <ul style="list-style-type: none"> • Regular communication of project status and next steps. • Documented community involvement. • Adherence to environmental justice goals of fair treatment and meaningful involvement of all people regardless of race, color, national origin, sex, disability, age, sexual orientation, veteran status, or income. 	<p>Beginning Q2</p>
<p>Complete annual financial reports and submit to EPA:</p> <ul style="list-style-type: none"> • Maintain grant files. • Establish and maintain administrative record. • Maintain financial records. • Complete Federal Financial Report (FFR) form. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Accurate and complete files suitable for audit purposes. <p>Outcomes:</p> <ul style="list-style-type: none"> • High quality project records reflective of the work performed. 	<p>Q5, Q9, Q13</p>
<p>Complete comprehensive final report:</p> <ul style="list-style-type: none"> • Prepare final report describing how each item in the work plan was addressed and including grant closeout material. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Final report and closeout forms. 	<p>Q13</p>
<p>Complete ACRES database entries for all assessment activities undertaken in the project:</p> <ul style="list-style-type: none"> • Maintain site project files. • Enter site data in ACRES database. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Quarterly reports and other forms; updated ACRES database. <p>Outcomes:</p> <ul style="list-style-type: none"> • Current database for congressional reporting. 	<p>Q2-Q13</p>
<p>Requests for Reimbursements or Advances</p>	<p>Outputs:</p> <ul style="list-style-type: none"> • Forms submitted for payment <p>Outcomes:</p> <ul style="list-style-type: none"> • Reduce unliquidated obligations 	<p>Q2-Q13</p>
<p>Training</p> <ul style="list-style-type: none"> • Attend EPA Brownfields Conferences and other related workshops. 	<p>Outputs:</p> <ul style="list-style-type: none"> • Attend Brownfields Conferences. <p>Outcomes:</p> <ul style="list-style-type: none"> • Improve Brownfields knowledge and expand networking opportunities. 	<p>Q3-Q13</p>

6. QUALITY ASSURANCE

Prior to undertaking Phase II assessments, the City of Pueblo, Colorado, assisted by the qualified environmental professional, will prepare and submit a Quality Assurance Project Plan (QAPP) which meets the approval of the U.S. EPA Region VIII Brownfields Program. A draft will be submitted early for review. The QAPP will describe the project, the sampling and analytical strategies, and the methods and procedures that will be used in all Phase II assessments. The Region VIII EPA crosswalk shall be submitted with each site-specific QAPP. QAPP approval will be obtained prior to performing any field activities. (Refer to QAPP flyer for additional information.)

7. PRE-AWARD COSTS

The City of Pueblo, Colorado will not request approval of pre-award costs for this cooperative agreement. It will not be necessary to execute work before City Council approval of a grant-funded qualified environmental professional contract before October 1, 2020.

8. COMPLIANCE WITH OTHER FEDERAL REQUIREMENTS

The grantee will comply with other requirements including but not limited to the following: Disadvantaged Business Enterprise (DBE) requirements found at 40 CFR Part 33; OSHA Worker Health & Safety Standard 29 CFR 1910.120; Uniform Relocation Act; Historic Preservation Act; Endangered Species Act; permits required by Section 404 of the Clean Water Act; Executive Order 11246, Equal Employment Opportunity; regulations at 41 CFR 60-4; Contract Work Hours and Safety Standards Act, as amended (40 USC 327-333); Anti-Kickback Act (40 USC 276c); and Section 504 of the Rehabilitation Act of 1973 as implemented by Executive Orders 11914 and 11250.