

**IMPLEMENTATION WORK PLAN**  
**United States Environmental Protection Agency Cooperative Agreement for a Brownfield  
Cleanup Grant**

**Grant Recipient: Community Development Authority of the City of Manitowoc, Wisconsin  
June 11, 2024**

Community Development Authority  
City of Manitowoc  
900 Quay Street  
Manitowoc, WI 54220

**Project Contact:**

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Project Period: **October 1, 2024 – September 30, 2028**

66.818; Brownfields Assessment, Cleanup and Multipurpose Agreements  
EPA-I-OLEM-OBLR-23-15, Request for Applications for Brownfields Cleanup Grants

This project supports the following goals or objectives in EPA's 2022-2026 Strategic Plan:

**Goal 6** – Safeguard and Revitalize Communities.

**Objective 6.1** – Clean Up and Restore Land for Productive Uses and Health Communities of EPA's Strategic Plan

## **1.0 PROJECT**

The Community Development Authority of the City of Manitowoc (CDA) was awarded a grant for the cleanup of the Phase I Redevelopment Area at 1512 Washington Street to support multi-family reuse of the area. Work under the grant will consist of the demolition/crushing of the remaining concrete slab, removal and disposal of hazardous substances from the site as well as the importation of clean fill into the area to serve as an engineered barrier.

## **2.0 INTRODUCTION AND PROPOSED OUTPUTS AND OUTCOMES**

The Small Business Liability Relief and Brownfields Revitalization Act was signed into law on January 11, 2002. The Act amends the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), as amended, by adding Section 104(k). Section 104(k) authorizes the U.S. Environmental Protection Agency (EPA) to provide funding to eligible entities to inventory, characterize, assess, conduct cleanup, and reuse planning, remediate, or capitalize revolving loan funds to remediate eligible brownfields sites. The Brownfields Utilization, Investment and Local Development (BUILD) Act was enacted on March 23, 2018 as part of the Consolidated Appropriations Act, 2018. The BUILD Act reauthorized EPA's Brownfields Program and made amendments to the 2002 Small Business Liability Relief and Brownfields Revitalization Act. Authorized changes affect brownfields grants, ownership and liability provisions, and state and tribal response programs. Finally, the Infrastructure Investment and Jobs Act (IIJA) of November 2021 provided additional funding and opportunities for communities to address the economic, social, and environmental challenges caused by brownfields sites. Pursuant to these provisions, EPA conducts annual Brownfields grant competitions. Recipients were selected from applications prepared in accordance with the "Application Guidelines for Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Grants," and submitted in a national competition. The CDA as a quasi-governmental entity that operates under the supervision and control of, and as an agent of, the City of Manitowoc, which is a general-purpose unit of local government, was selected for Cleanup funding in the FY 2024 competition.

The CDA will use the funding provided by this grant to complete the following items: (1) The demolition of the remaining concrete building slab to access subsurface for cleanup; (2) The excavation, transportation, and offsite disposal of soil from two comingled VOC/PCB source areas per USEPA and WDNR requirements to reduce contaminant mass; (3) The abandonment of an existing utility tunnel network to prevent vapor migration; (4) The excavation and offsite disposal of contaminated soil not suitable for reuse onsite; (5) The importing of clean fill to construct sitewide engineered barriers per WDNR specifications to mitigate the potential for direct contact with residual soil impacts and reduce the risk for mobilization of soil impacts to groundwater; (6) The design of a sub-slab depressurization system (SSDS) to mitigate the risk for vapor intrusion; and (7) Establish institutional controls to provide for long-term control of residual soil and groundwater impacts post-construction along with the preparation of a Construction Documentation Report (CDR) following completion of active remediation.

The City of Manitowoc Comprehensive Plan, the Manitowoc River and Trail Corridor Plan, the Tax Increment District No. 16 and No. 19 Project Plans, the Downtown Master Plan, and the Downtown Parking Analysis will guide reuse of the Property. Equitable and sustainable redevelopment are central to the Plans guiding this project, which are in direct alignment with the USEPA/HUD/DOT *Livability Principles*. This reuse strategy is in direct alignment with community priorities and needs, as expressed by underserved community members and members

of the Brownfields Advisory Committee (BAC) during public meetings/charettes held during development of the Plans. The underserved community struggles with a severe lack of housing in the downtown area; therefore, the proposed reuse of the Target Property is targeted to work force and low-income multi-family reuse.

### **3.0 MANAGEMENT AND COORDINATION**

The Manitowoc Brownfields Advisory Committee (BAC) was established 11 years ago to provide significant oversight/input on the City's Brownfields program. The City of Two Rivers and Progress Lakeshore were added to the BAC through the award of a coalition site assessment grant in 2021. The general public and property owners near the subject property will be engaged in collaboration with the BAC and the grantee's ongoing outreach efforts.

Current members of the BAC include:

- James Lemerond – Lakeshore Technical College
- David Diedrich – Retired Community Banker
- Abbey Quistorf – The Chamber of Manitowoc County
- Mike Huck – Consultant to Non-Profits
- Jamie Zastrow – Progress Lakeshore
- Terrance Fox – Lambert, Fox & Glandt LLP
- Dennis Tienor – Bank of Luxemburg
- Elizabeth Runge – City of Two Rivers
- Adam Tegen – City of Manitowoc

The BAC and coalition members will collaboratively oversee the implementation of the workplan for the grant.

The cornerstone of the City's Brownfields Program is enhancing public education/communication through continued workshops, resident questionnaires, and web-based engagement. Within one month of award, the CDA will develop a Community Involvement Plan (CIP) to leverage the expertise and networks of the BAC. The CIP will be designed specifically to engage and inform the community members and to provide an avenue for feedback from the community. The approved CIP will be implemented in Fall 2024 to integrate community involvement utilizing the BAC to engage the community and local businesses in the cleanup of the Target Property.

Project meetings targeted at community involvement will be held in the evenings to accommodate work schedules of stakeholders. In addition, meetings will be held at a location served by the mass transit system and within walking distance of the target property. Meeting facilities will be ADA compliant to accommodate needs of sensitive populations (i.e. disabled or elderly). Hard copies of all project outputs will be made available through the CDA to ensure access to stakeholders with limited access. Meetings of the BAC are likely to be held on a monthly basis for the first year and bi-monthly thereafter, or as needs arise. Another method used to communicate progress will be the creation and regular updating of a project webpage on the City's website. The webpage will include project updates, fact sheets and meeting announcements, as well as links to project documents and deliverables (as a means of maximizing transparency). The webpage will also

include a mechanism for soliciting project input. The CDA will compile community input on a quarterly basis and circulate the summary to the BAC to develop response options. Public input and the response will be summarized in the quarterly project progress reports and on the project webpage.

Paul Braun, City Planner, for the City of Manitowoc, will serve as the Project Manager and primary point of contact for the Project. Mr. Braun will be responsible for implementing grant funded activities in accordance with the approved Work Plan. He will also approve all contracts and reports; coordinate meetings; manage the public outreach; secure assistance from coalition members as needed, and oversee work by the environmental and other contractors, as well as manage project finances. Mr. Braun has worked on the City’s FY18 USEPA CWA grant and FY13 RLF grant and a FY18 USEPA SSA grant, and most recently a FY21 USEPA Coalition Assessment grant and FY22 USEPA Cleanup grant. Mr. Braun has served in planning, zoning, and economic development for over 30 years as a municipal staff member.

#### 4.0 PROJECT DESCRIPTION

The CDA has developed the appropriate tools and procedures to immediately begin implementation of this grant and execute key project activities within the performance period. The CDA is the current owner of the Target Property, therefore an access agreement is not needed. As such, the CDA is able to begin work immediately. The CDA has internal procedures and experience to retain a QEP and remedial contractors per the requirements of 2 CFR 200.317 - 200.326 to perform the environmental assessment tasks. If needed, additional contractors can be procured following these methods. The CDA will utilize the expertise of the BAC, to provide additional guidance on use of grant funds to complete the project. The following table summarizes the timing of key project activities and responsibilities that will take place to address the Target Property.

<b>Task 1 - Activity: Program Management</b>
<u>i. Project Implementation:</u> Manage QEP, prepare Quarterly Reports, Annual Financial Reports, and MBE/WBE Reports; update ACRES database; prepare Grant Closeout Report
<u>ii. Anticipated Project Schedule:</u> Quarterly progress reports will be submitted by Jan. 30th, Apr. 30th, Jul. 30th, and Oct. 30th of each year, with the first due on Jan. 30, 2025. Annual DBE reports will be submitted by Oct. 30th, with the first due on Oct. 30, 2025. Grant closeout expected Q1 FY26
<u>iii. Task/Activity Leads:</u> CDA Project Manager and CDA Project Coordinator (with input from QEP)
<u>iv. Outputs:</u> Admin Records; Contractor Procurement Documentation; (4) Quarterly Reports; (1) Annual Financial Reports; (1) MBE/WBE Reports; (1) Grant Closeout Report. (# of outputs assumes schedule holds)
<b>Task 2 - Activity: Cleanup Oversight</b>
<u>i. Project Implementation:</u> Finalize ABCA, abandon monitoring wells, and complete waste characterization sampling to develop waste profiles and prepare RAP/MMP. Develop bid specifications, retain remedial contractor, oversee cleanup activities and Davis-Bacon Act compliance, and prepare CDR. Assist EPA with NHPA Section 106 Compliance.
<u>ii. Anticipated Project Schedule:</u> Finalize ABCA, abandon monitoring wells, complete waste characterization sampling (Q1 FY25), develop waste profiles and RAP/MMP for WDNR and landfill approvals (Q1 FY25). Develop bid specs, retain remedial contractor, and implement cleanup plan (Q1 FY25). Complete Davis Bacon Act (DBA) compliance documentation concurrent with Task 3. Prepare CDR and design sub-slab depressurization system (SSDS) (Q3-Q4 FY25). If early work request granted, schedule will shorten by (1) quarter

iii. <u>Task/Activity Leads</u> : CDA Project Manager (PM), QEP, with input from WDNR and USEPA PMs
iv. <u>Outputs</u> : ABCA; waste profiles; RAP/MMP; bid spec; DBA Summary; Construction Documentation Report, SSDS design; documents and reports for NHPA compliance.
<b>Task 3 - Activity: Cleanup (Remediation Contractor Only)</b>
i. <u>Project Implementation</u> : Implement cleanup plan described in Section 3.a
ii. <u>Anticipated Project Schedule</u> : Q1 FY25 through Q4 FY25
iii. <u>Task/Activity Leads</u> : CDA PM, Remedial Contractor(s) PM(s) (to be retained in Q1 FY25), and QEP PM
iv. <u>Outputs</u> : Daily construction logs; landfill tickets
<b>Task 4 - Activity: Community Outreach</b>
i. <u>Project Implementation</u> : Prepare and implement a Site-Specific CIP. Host quarterly public meetings to discuss Target Property cleanup and redevelopment plans; community events; present at National Brownfield Conference
ii. <u>Anticipated Project Schedule</u> : First meeting Q1 FY25, then quarterly; Brownfield Conference in 2025
iii. <u>Task/Activity Leads</u> : CDA PM and BAC, with input from QEP
iv. <u>Outputs</u> : CIP, meeting deliverables, reuse plans, presentation materials

## 5.0 BUDGET

A summary of the overall budget for grant funded activities is provided below, followed by an explanation for how cost estimates were developed and applied, with unit costs as applicable.

Budget Categories	Task 1	Task 2	Task 3	Task 4	Total
	Program Management	Cleanup Oversight	Cleanup	Community Outreach	
Personnel	\$3,952	\$3,800		\$1,824	\$9,576
Fringe	\$1,248	\$1,200		\$576	\$3,024
Supplies				\$2,450	\$2,450
Contractual	\$6,000	\$195,400		\$5,500	\$206,900
Construction			\$1,730,600		\$1,730,600
Other (WDNR Fees, Printing, Mailings)		\$5,850			\$5,850
<b>TOTAL BUDGET</b>	<b>\$11,200</b>	<b>\$206,250</b>	<b>\$1,730,600</b>	<b>\$13,450</b>	<b>\$1,961,500</b>

Descriptions and budget justifications below are based on costs incurred by the City during past similar brownfield cleanup projects. By State statute and local ordinance, the City of Manitowoc Department of Community Development serves as the fiduciary and managing agent of the CDA (the grant applicant). Personnel (\$38/hr) and fringe (\$12/hr) are an average of City staff. Contractual estimates are based on recently bid cleanup work in Manitowoc that was compliant with the Davis Bacon Act.

<b>Task 1 – Program Management: Total Budget = \$11,200</b>
<b>Cost Basis and Assumptions:</b> Personnel/Fringe Costs of \$5,200 are budgeted for an estimated 104hr (@\$50/hr) of work by the CDA PM and staff to manage the cooperative agreement as follows: manage QEP activities (5hr/month*12 months=60hr), preparation of quarterly reports and maintenance of the ACRES database (5hr/quarter*4 quarters=20hr), annual financial and disadvantaged business enterprise reporting (8hr/year), prepare grant closeout report (16hr).

Contractual Costs of **\$6,000** are budgeted for an estimated 48hr (@ \$125/hr) of work by QEP in providing assistance in completing various required reports.

**Task 2 – Cleanup Oversight: Total Budget = \$206,250**

**Cost Basis and Assumptions:** Personnel/Fringe Costs of **\$5,000** are budgeted for an estimated 100 hr (@\$50/hr) of work by the CDA PM and staff for developing and issuing bid specs (40hr); review project deliverables (20hr); and coordination during onsite field work (40hr). Other “WDNR fees” for regulatory oversight reviewing project deliverables is **\$5,850**.

Contractual Costs of **\$195,400** are budgeted for the following work to be performed by the QEP: complete pre-design waste characterization sampling (\$36,900, includes driller and lab costs); seal monitoring wells (25 wells @ \$700 per well); finalize the ABCA, develop landfill waste profiles and prepare a Remedial Action Plan / Material Management Plan (100hr @ \$150/hr); prepare two bid specs and assist City in bidding (120hr @ \$150/hr); securing appropriate permits (40hr @ \$150/hr); remedial contractor oversight and DBA documentation (50 days @ \$1,500/day); preparing a construction documentation report (100hr @ \$150/hr); designing a Sub-Slab Depressurization System (SSDS; 80hr@ \$150/hr).

**Task 3 – Cleanup: Total Budget = \$1,730,600**

**Cost Basis and Assumptions:** Construction Costs of **\$1,730,600** are budgeted for demolition/crushing of the remaining concrete building slab to create an engineered barrier (104,000 ft2 @ \$3/ft2); excavation and offsite disposal of PCB- and VOC-impacted soils into TSCA landfill (2,000 yd3 @ average \$440/yd3); demolition and abandonment of utility tunnel network to prevent vapor migration (1,500 ft at @ \$20/ft); place/compact crushed concrete and construct engineered barrier in parking lot (33,800 ft2 @ \$3/ft2); excavation and offsite disposal of contaminated soil into a solid waste landfill (2,800 yd3 @ \$90/yd3); import clean fill to construct engineered barriers (2,800 yd3 of clay and topsoil for greenspace @ \$19/yd3; 3,400 yd3 of granular fill for building/sidewalks/playground @ \$30/yd3).

**Task 4 – Outreach: Total Budget = \$13,450**

**Cost Basis and Assumptions:** Personnel/Fringe Costs of **\$2,400** are budgeted for an estimated 48 hr (@\$50/hr) of work by the CDA PM and staff for planning/hosting (4) outreach activities (12hr/quarter @ \$50/hr). Supply Costs of **\$2,450** are budgeted for printing costs (\$1,500) and mailing costs for public notices (\$950). Travel Costs of **\$3,100** are for (2) City staff to attend the three-day National Brownfield Conferences in 2025 [\$1,560 for meals and for lodging (@\$260/person/night); \$700 for registration (@\$350/person); \$700 for air travel (@\$350/person); and \$140 for ground transportation (@ \$70/person)]. Contractual Costs of **\$5,500** are budgeted for an estimated 44 hr of work by the QEP (@ \$125/hr) to prepare a site-specific CIP and assist with outreach activities.

## 6.0 MEASURES OF SUCCESS

The CDA will track project outputs and schedule continuously to ensure the grant funds are expended in a timely and efficient manner to the greatest benefit of the community. Outputs will be compared to the project schedule; if a deviation of more than one fiscal quarter is reached, interventions (ex. increased team meetings) will be implemented to maintain the project schedule. Project outcomes and accomplishments, including project milestones/ deliverables, and leveraged resources will further be tracked on a monthly/quarterly basis in the ACRES database. Overall project outcomes will be tracked/quantified in the final progress report by comparing future community demographics/welfare

characteristics to current conditions and will include: (1) increase in shovel-ready portions of the Target Property suitable for multi-family residential, (2) leveraged investment in the Target Property. Outcomes advancing the City's Brownfield Objectives include (3) increase in developer interest in the adjoining Phase II Redevelopment Area of the former Mirro Plant 9, and more broadly, (4) increase in property values in the vicinity of the Target Property. If the timelines for advancing one or more phases of work at the Target Property are not well-aligned with the USEPA grant project period, then the CDA and QEP will work with WDNR/USEPA to adjust the approach to maintain progress on achieving the project outcomes. Outcomes will be tracked long term on a five-year basis by the CDA and reported in future brownfield conferences, fact sheets and/or the City website.

## **7.0 QUALITY ASSURANCE**

Waste characterization sampling and confirmation sampling will be performed under the oversight of the Wisconsin Department of Natural Resources. As such, a new QAPP will not be utilized for the project.

## **8.0 PRE-AWARD COST AUTHORIZATION**

Although the grant may not be awarded until October 1, 2024, The CDA is requesting pre-award cost approval for project related and scoped work activities to be completed up to 90 days prior to award. To accommodate the pre-award costs, the performance and budget period will start July 1, 2024. This will include portions of Task 2 as outlined and detailed in the attached Request for Pre-Authorization and Details for July-September 2024 dated June 11, 2024. All pre-award activities funded through the agreement will be eligible expenses conducted in accordance with this work plan and the CDA understands that these costs would be fronted by the City with payment or reimbursement via the EPA grant coming only after October 1, 2024; or when the cooperative agreement is in place.



# CITY OF MANITOWOC

WISCONSIN, USA  
[www.manitowoc.org](http://www.manitowoc.org)

June 11, 2024

Attention: Mr. Eric Knapke  
Program Officer Brownfields Program  
United States Environmental Protection Agency Region 5  
77 West Jackson Blvd.  
Chicago, IL 60604-3590

**Re: Request for Pre-Authorization and Details for July-September 2024  
FY 2024 USEPA Brownfield Cleanup Grant for the Phase 1 Redevelopment Area at 1512  
Washington Street  
City of Manitowoc, Wisconsin**

Dear Mr. Knapke:

The Community Development Authority (CDA) of the City of Manitowoc (City) is submitting this pre-authorization request for early implementation of the brownfield cleanup grant awarded to the CDA by the United States Environmental Protection Agency (USEPA) in 2024 for cleanup in the Phase 1 Redevelopment Area at 1512 Washington Street (herein referred to as the Property). The work plan and associated forms (ex. SF-424) were submitted to you on June 11, 2024 via email. We anticipate receiving the cooperative agreement in October 2024 and continuing implementation of the grants at that time. This request includes a description of the proposed scope of work; a budget; and a schedule for work to be initiated on July 9, 2024.

## **PROPOSED SCOPE OF WORK**

As described in our grant application and the Stantec (2023) DRAFT Analysis of Brownfield Cleanup Alternatives (ABCA), we have an immediate and urgent need to begin implementation of the grant to prepare the Property for multi-family redevelopment in Spring 2025. The grant workplan describes four tasks to be implemented during the grant performance period:

- Task 1 – Program Management
- Task 2 – Cleanup Oversight
- Task 3 – Cleanup
- Task 4 – Community Outreach

As the Wisconsin Department of Natural Resources (WDNR) confirmed the approach described in the Stantec (2023) ABCA is ready to begin, we are requesting pre-authorization for the following scope of work to be completed under Task 2 between July 9 and September 30, 2024. This will allow remediation work to begin in early Q1 of FY25, with the goal of finishing all intrusive remediation work by January 1, 2025.



### Task 2.2 – WDNR Oversight

Stantec will work with the Wisconsin Department of Natural Resources to ensure agency review/approval of the project deliverables described under Task 2.3.

### Task 2.3 – Remedial Planning

Stantec will complete pre-design waste characterization sampling of impacted soils requiring active remediation to confirm appropriate handling, transportation, and disposal options. Stantec will work to develop the necessary landfill waste profiles and prepare a combined Site Investigation (SI) and Remedial Action Plan/Material Management Plan (RAP/MMP). Stantec will finalize the ABCA based on the approach defined in the RAP/MMP. Stantec will work with the City to prepare a minimum of two bid specifications while assisting the City in the bidding process. The final ABCA will be published for public comment (30 days) concurrent with publication of the bid spec. A decision memorandum will be prepared following the public comment period. All proposed work will be reviewed and the necessary permits will be secured by the City with the assistance of Stantec. Finally, Stantec will coordinate the removal and sealing of existing monitoring wells located on the subject property expected to be impacted by the proposed remedial scope of work.

## BUDGET

The following pre-authorization budget for Task 2 summarized below are based on the proposed pre-authorization scope of work using estimates provided in the work plan and detailed previously.

<b>Budget Categories of Pre-Award Costs</b>	<b>Total</b>
Task 2.2 – WDNR Oversight	\$5,850 (agency review fees)
Task 2.3 – Remedial Planning	\$93,400 (see details below)
<b>Total Budget of Pre-Award</b>	<b>\$99,250</b>

The contractual budget under Task 2.3 pre-award costs include:

<b>Contractor</b>	<b>Task</b>	<b>Description of Work</b>	<b>Cost Estimate</b>
Stantec	2.3	Complete pre-design waste characterization sampling (includes driller and lab costs)	\$36,900
	2.3	Develop landfill waste profiles and prepare Combined SI and RAP/MMP; Finalize the ABCA; and Prepare Decision Memorandum (100 hours @ \$150/hr)	\$15,000
	2.3	Prepare two bid specifications and assist with bidding (120 hours @ \$150/hr)	\$18,000
	2.3	Securing appropriate permits (40 hours @ \$150/hr)	\$6,000
	2.3	Seal monitoring wells (25 wells @\$700 each)	\$17,500
<b>Total</b>			<b>\$93,400</b>

## SCHEDULE

The following schedule summarizes work to be completed under this request between July 9 and September 30, 2024. The compressed schedule below will allow the City to award the remediation contract in early October 2024, with onsite remediation work beginning within 30-days of award.

Task	Subtask	Milestone / Deliverables	Date*
	2.3	Complete pre-design waste characterization sampling	July 19, 2024
	2.3	Develop Landfill Waste Profiles and Prepare a Combined SI and RAP/MMP	August 16, 2024
	2.3	Finalize ABCA and Publish for Comment	August 23, 2024
	2.3	Prepare and Issue Bid Specs	August 30, 2024
	2.3	Secure Appropriate Permits	September 13, 2024
	2.3	Seal Monitoring Wells	September 23, 2024
	2.3	Prepare Decision Memorandum	September 27, 2024

\* Completion dates assume a July 9, 2024 start date.

If you have any questions, or require any additional information, please contact me. As summarized herein, we have an immediate and urgent need to begin implementation of the grant to complete remedial work at the Property.

We look forward to collaborating with you on this project.

Sincerely,



Adam Tegen  
Community Development Director

### References

Stantec, 2023, [Draft] Analysis of Brownfield Cleanup Alternatives, Phase 1 Redevelopment Area, 1512 Washington Street, Manitowoc, Wisconsin, October 26, 2023.