



BROWNFIELDS ADVISORY COMMITTEE

Meeting Agenda

Thursday, July 23, 2026, 10-11 am

**Physical Location: Central Vermont Regional Planning Commission Conference Room
located at 29 Main Street, Suite 4 Montpelier, VT 05602**

Participation via Zoom¹

<https://us02web.zoom.us/j/88055614529?pwd=c2dVaTMvUnc0VU55bUd1TEhTWjkzUT09>

Dial in via phone: +1 929 436 2866 | Meeting ID: 880 5561 4529 | Passcode: 215936

Download the app at least 5 minutes before the meeting starts: <https://zoom.us/download>.

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Page #

1	<u>AGENDA</u>
	10:00² Recording Reminder & Adjustments to the Agenda
	10:05 Roll Call
	10:10 Public Comment
2-4	10:15 Review and Approval of Draft Minutes from 6/5/26 Meeting (Action possible - enclosed)³
	10:20 Voting of officers (Action possible - enclosed)⁴
5-7	10:30 Projects and Requested Actions (Action possible - enclosed)⁵ • Warren Town Garage/119 School Road, Warren – Phase I ESA
8-37	10:45 Revolving Loan Fund Program Manual (Action possible - enclosed)⁶
38-46	10:55 Debrief of Grow America Revolving Loan Fund Conference Program Updates and Budget Review
	11:00 Adjourn

¹ Dial-in telephone numbers are “Toll” numbers. Fees may be charged to the person calling in dependent on their phone service.

² All times are approximate unless otherwise advertised

³ Anticipated action item.

⁴ Anticipated action item.

⁵ Anticipated action item.

⁶ Anticipated action item.

CENTRAL VERMONT REGIONAL PLANNING COMMISSION

Brownfields Committee Meeting – MINUTES

June 5, 2026

Present:

X	Janet Shatney, Chair, Barre City Commissioner
X	Don LaHaye, Vice Chair, Waitsfield Commissioner (Alternate Seat)
X	Peter Carbee, Washington Town Commissioner
X	Ron Krauth, Middlesex Town Commissioner
X	Fred Kenney, CVEDC
X	Joan Marie Misek, VT Dept of Health
-	Nicola Anderson, Downstreet Housing and Community Development
-	Liz Scharf, Capstone Community Action
-	Kevin Casey, Hickok and Boardman
-	Vacant, (environment or finance organization)
-	Vacant (environment or finance organization)

Staff present: Christian Meyer, CVRPC Executive Director and Eli Toohey, CVRPC Planner

Consultants present: Chris Gdak, Onterris, Andrea Pederson, Onterris, Dan Voisin, Stone Environmental

Members of the Public: Stephen Whitaker, Montpelier

Call to Order: Chair Janet Shatney called the meeting to order at 1:04 pm.

Roll Call

Adjustments to the Agenda: None

Public Comment: Stephen Whitaker (Montpelier) read his prepared comments into the record. A copy of these comments was sent to the Brownfields Advisory Committee and are filed titled *June5_Whitaker_Memo*. This public comment raised concerns of conflict of interest, governance concerns and assessment process and content flaws related to

an item on the agenda. The Chair stated time would be allowed during the agenda item for comment.

Review and Approval of Draft Minutes of 3/19/26 Meeting

The meeting minutes were not addressed during this meeting and will be on the agenda for the next Brownfields Advisory Committee meeting.

Review of Memo by Montpelier Community Member and Onterris Response, re:203 Country Club Road

Concerns by Montpelier community member, Stephen Whitaker, were further heard by the Brownfields Advisory Committee and guests. These comments are submitted as *June5_Whitaker_Memo* and were distributed to the Brownfields Advisory Committee immediately after the BAC meeting adjourned. Joan Marie Misek asked about the Work Plan and the inputs and process of the Work Plan in relation to assessment. Dan Voisin of Stone Environmental responded with the process for developing a SSI Work Plan and that they haven't been authorized to develop that Work Plan yet and that the development of the Work Plan and Data Gaps are what this funding request would fund. Dan Voisin, Stone Environmental further explained that a Site-specific Conceptual Site Model was developed during the Phase II assessment which is the mechanism to capture all available data and how the site is to be managed and what the recommendations of the Phase II are. He went on to state that the Work Plan is the development of a good and reasonable approach to fill data gaps. He went on to explain that the cost estimate we have is a budgetary placeholder for what is estimated needs to be done to develop a Work Plan and fill data gaps. Dan stated that he's been in this business for 25 years and that he does many of these to the requirements of DEC and EPA. Chris Gdak, Onterris, stated that the next steps would be to draft a Supplemental Site Investigation Work Plan and to work through CVRPC to submit this to VT DEC and EPA for review and comment. If the costs deviate from what has been estimated, then it would come back to CVRPC.

Chair asked what the action is and staff responded that there was no specific action, that there was action possible noted on the agenda if it should come up.

Projects and Requested Actions

Site summaries were given for each site by CVRPC staff, Eli Toohey. Janet asked the consultants how quickly this would move once approved and if they have built it into budget and time constraints. Onterris' Andrea Pederson responded that they have and stated that within the timeline allowed with the DEC process including review periods of 30 days and EPA including up to 60 days. She also added to previous conversation that all Work Plans have 2 EPA and 1 DEC reviewers signing off on those. Fred Kenney

asked if the sequence of tasks was the same as for any other project for 203 Country Club Road. Onterris' Andrea Pederson responded that the sites were different assessment Phases. Chris Gdak, Onterris, said that essentially the process is the same for each phase.

Work Plan Development for a Phase II ESA - 143 N. Main Street, Barre City

Move to recommend the CVRPC Board of Commissioners' Executive Committee approve funding of up to \$4,000 for Onterris to do a Work Plan Development for a Phase II Environmental Site Assessment Work Plan for 143 North main Street, Barre City

Peter Carbee made Motion, seconded by Joan Marie Misek, passed unanimously.

Phase I ESA – 150 Ayers Street, Barre City

Move to recommend to the CVRPC Board of Commissioners' Executive Committee to approve funding of \$5,500 for Onterris to do a Phase I Environmental Site Assessment for 150 Ayers Street in Barre City.

Motioned by Peter Carbee, seconded by Janet Shatney, passed unanimously.

Supplemental Site Investigation for 707 Stonecutters Way in Montpelier.

Move to recommend to the CVRPC Board of Commissioners' Executive Committee to approve funding of up to \$55,203.35 (estimates plus a 20% contingency) for a Supplemental Site Investigation for 707 Stonecutter Way in Montpelier.

Motioned by Peter Carbee, seconded by Janet Shatney, passed unanimously.

Supplemental Site Investigation for 203 Country Club Road in Montpelier

Move to recommend to the CVRPC Board of Commissioners' Executive Committee to approve funding of up to \$86,928.85 (estimates plus a 20% contingency) for a Supplemental Site Investigation for 203 Country Club Road in Montpelier.

Motioned by Peter Carbee, seconded by Fred Kenney, passed unanimously.

Program Updates

Will be addressed at next Brownfields Advisory Committee meeting.

Meeting Adjournment: Motion to adjourn was made by Don LaHaye and seconded by Peter Carbee and passed unanimously. Meeting adjourned at 1:51.



MEMO

Date: July 9, 2026

To: Brownfields Advisory Committee

From: Eli Toohey, Planner

Re: Project Review Memo

119 School Street, Warren VT

☒ **ACTION REQUESTED:** *move to recommend the CVRPC Board of Commissioners' Executive Committee approve sending application for site eligibility for 119 School Street to EPA.*

This site is owned by the Town of Warren. It has been used as a town garage since the 1960s and is currently used as town garage. The town garage is relocating, and the intended reuse is for affordable housing, 8-10 lots, up to 16 units.

SMS #:	2025-5540
Reuse:	Affordable Housing
Owner:	Town of Warren
Prospective Owner:	TBD
Developer:	TBD
Assessment Activity:	Site nomination form is requesting a Phase I & II
Assessment Status:	TBD
Funds recommended:	TBD
Contractor:	TBD
BRELLA status:	Not BRELLA enrolled, CVRPC Brownfields has recommended they enroll

Warren Town Garage, 119 School Road, Warren VT
Site Scoring Matrix
Central Vermont Regional Planning Commission

Factor	Criteria	Points	Score
Ownership	Publicly owned or access secured from private owner	25	25
	Private ownership but owner cooperative	10	
	Owner non-responsive and no access	0	
Redevelopment Potential	Clearly defined reuse plan	20	10
	Conceptual reuse plan or general community support	10	
	No clear reuse plan or barriers exist to reuse	5	
Equitable Housing Potential	Provide safe & affordable housing for diverse social and income groups	20	20
	Provide housing options above market value	10	
	Not a housing project	0	
Flood Resiliency Potential	Development outside of floodplain OR supports protection/restoration of floodplain	20	20
	Project located in floodplain but will not exacerbate flooding & fluvial erosion	10	
	Project located in flood hazard area & lacking clear plans for resiliency measures	0	
Community Benefit	Creation of new jobs, green space, and/or healthcare or other essential services	15	10
	Community benefits are expected but intangible or not easily quantified	10	
	No specific community benefit	5	
Disadvantaged or Overburdened Community	Site is located in a low income, area of negative socioeconomic outcomes, or historically overburdened area	15	5
	Moderately low income, moderately poor negative socioeconomic outcomes, or somewhat overburdened area	10	
	Limited alignment with the above criteria	5	
Environmental or Health Risks	Documented contamination with high potential exposure pathway	15	5
	Suspected contaminated with potential high or medium potential exposure pathway	10	
	Low likelihood of contamination	5	
Readiness to Proceed	Site is, "shovel ready" for assessment to begin	10	5
	Site groundwork or clearing is needed for assessment	5	
	Site has limited safe access or requires extensive preparations to investigate	2	
Priority and Planning Alignment	Site is in an adopted land use plan, AWP area, or is prioritized by local government	5	5
	General alignment with land use plans but not explicitly prioritized	3	
	No known alignment with existing plans	1	
Displacement	Reuse plans will not displace existing tenants or residents	5	5
	Potential to displace existing tenants or residents	3	
	Tennants or residents will be displaced	0	
	Zoning Compatibility: Sites located in areas zoned or planned for residential or mixed-use development	5	5
	Not compatibly zoned.	1	-
	Proximity to Services: Within ½ mile of transit, schools, or essential services to support workforce and affordable housing.	+1	1

State Planning Goal #11: Housing	Infrastructure Readiness: Access to water, sewer, and broadband to reduce development costs	+1	1
	Affordability Leverage: Potential to support income-qualified or workforce housing through public-private or nonprofit partnerships	+1	1
	Reuse Potential: Vacant or underutilized sites within existing settlement areas (to prevent sprawl).	+1	1
State Planning Goal #14: Flood Resilient Communities	Flood Hazard Avoidance: Outside mapped floodways and special flood hazard areas (SFHAs).	5	5
	Inside a mapped floodway or special flood hazard area	0	0
	Elevation and Drainage: Sites that allow safe building elevations or low-cost mitigation.	+1	-
	Natural Buffer Preservation: Maintains riparian buffers or wetlands that reduce downstream flood risks.	+1	0
	Stormwater Management: Opportunities for green infrastructure or flood storage enhancement.	+1	1
	Community Resilience Value: Supports relocation or redevelopment of vulnerable properties.	+1	1

Total Score (out of 160 points): 126



Central Vermont Regional Planning Commission Brownfields Revolving Loan Fund Program Manual

EPA Cooperative Agreement Number: 4B-00A01670

Prepared by:

Central Vermont Regional Planning Commission

29 Main Street, Suite 4

Montpelier, VT 05602

March 2026 | Version 1

Effective March 2026

This manual establishes the framework, procedures, and requirements for the administration of the Brownfields Revolving Loan Fund (BRLF) operated by the Central Vermont Regional Planning Commission (CVRPC). It is based on the authorities and requirements set forth in the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) Section 104(k), the Fiscal Year (FY) 2025 EPA General Terms and Conditions, Programmatic Terms and Conditions, and guidance provided by the U.S. Environmental Protection Agency (EPA) Brownfields Program, including the Updated BRLF Program Frequent Asked Questions (June 30, 2025).

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Figure 2	BRLF Process Flowchart

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Appendix A	Site Nomination Form
Appendix B	Funding Application
Appendix C	Loan Agreement Template
Appendix D	Project Evaluation Criteria
Appendix E	FY2025 EPA Brownfield RLF Terms and Conditions

Acronyms & Abbreviations

ABCA	Analysis of Brownfield Cleanup Alternatives
ACRES	Assessment, Cleanup and Redevelopment Exchange System
AAI	All Appropriate Inquiries
ASTM	American Society for Testing and Materials
BABA	Build America, Buy America Act
BFPP	Bona Fide Prospective Purchaser
BIL	Bipartisan Infrastructure Law
BRELLA	Brownfields Reuse and Environmental Liability Limitation Act
BRLF	Brownfields Revolving Loan Fund
CA	Cooperative Agreement
CACCR	Corrective Action Construction Completion Report
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	Code of Federal Regulations
COC	Certification of Completion
CPO	Contiguous Property Owner
CVRPC	Central Vermont Regional Planning Commission
DEC	Vermont Department of Environmental Conservation
ECAA	Evaluation of Corrective Action Alternatives
EPA	U.S. Environmental Protection Agency
ESA	Environmental Site Assessment
FUSRAP	Formerly Utilized Sites Remedial Action Program
FUDS	Formerly Used Defense Sites
ILO	Innocent Landowner
LUST	Leaking Underground Storage Tank
MIA	Made in America
NHPA	National Historic Preservation Act
NPL	National Priorities List
PCBs	Polychlorinated Biphenyls
PO	Project Officer
QAPP	Quality Assurance Project Plan
RCRA	Resource Conservation and Recovery Act
REC	Recognized Environmental Condition
RLF	Revolving Loan Fund
SAP	Sampling and Analysis Plan
SDWA	Safe Drinking Water Act
SF-425	Federal Financial Report Form SF-425
SSQAPP	Site-Specific Quality Assurance Project Plan
TSCA	Toxic Substances Control Act

1.0 Introduction

The Central Vermont Regional Planning Commission (CVRPC) Brownfields Revolving Loan Fund (BRLF) Program is a financial assistance initiative funded by the U.S. Environmental Protection Agency (EPA) under Section 104(k) of Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). The BRLF helps towns, nonprofits, and private entities clean up contaminated sites so they can be safely reused. The fund is supported by a \$1 million EPA award through the Bipartisan Infrastructure Law (Cooperative Agreement BF-00A01669) with a project period of May 16, 2025 – September 30, 2030. Loan repayments will be reinvested in new cleanup projects to build a sustainable BRLF program and keep funds circulating in the region.

The CVRPC's BRLF serves municipalities, nonprofit organizations, and private entities undertaking eligible cleanup projects within its jurisdiction (see **Figure 1**). Funds revolve as loan repayments and interest income are returned to the program and reinvested into additional cleanup projects. EPA Region 1 provides technical oversight and ensures the program's compliance with federal requirements. The Vermont Department of Environmental Conservation (DEC) is also involved in providing technical oversight.

2.0 Governance, Roles, and Responsibilities

CVRPC (the Grantee) serves as the lead agency for BRLF administration. The program is governed by policies established in this manual and the conditions of the cooperative agreement with EPA. The following groups work together to run the BRLF Program effectively:

- **Brownfield Advisory Committee** – Reviews applications, evaluates funding recommendations, and ensures equitable distribution of funds.
- **CVRPC's Board of Commissioners** – Provides oversight and adopts policies for BRLF implementation.
- **CVRPC Executive Committee** – Reviews income and authorizes expenditures for BRLF implementation.
- **RLF Fund Manager** – Handles all financial operations such as underwriting, tracking loan repayments, and preparing reports.
- **Loan Servicer** – Supports the RLF Fund Manager by tracking and managing repayments.
- **Qualified Environmental Professional (QEP)** – Ensures cleanups comply with federal and state technical requirements and assists with work plan and Site-Specific Quality Assurance Project Plan (QAPP) preparation.
- **Borrowers and Subgrantees** – Implement cleanup activities, comply with loan or subgrant terms, and report progress to CVRPC.
- **EPA Region 1** – Provides oversight and reviews site eligibility, QAPPs, and cleanup completion documentation.

3.0 Eligibility Requirements

3.1 Who Can Apply?

Applicants must demonstrate that both the organization and the site meet EPA's eligibility rules. Eligible entities include municipalities, regional planning commissions, nonprofit organizations, and private for-profit entities that are not potentially responsible parties under [CERCLA Section 107](#). The table below further describes the type of funding different entities are eligible to request.

Table 1: Eligible Loan and Subgrant Applicants

Type of Entity	Loan Eligible	Subgrant Eligible
For-Profits	X	
General purpose unit of local government (as defined in 2 CFR 200.1)	X	X
Land clearance authority or other quasi-governmental entity	X	X
Government entity created by a state legislature	X	X
Regional council or group of general-purpose units of local government	X	X
Redevelopment agency that is chartered or otherwise sanctioned by a state	X	X
State	X	X
Non-Profit Organizations (with or without 501(c)(3) tax exemption)	X	X
Non-Profit Organizations with 501(c)(4) tax exemption that do not lobby	X	X
Non-Profit Organizations with 501(c)(4) tax exemption that <u>do lobby</u> (Not eligible for loans or subgrants)		
Limited liability corporation or limited partnership comprised of 501(c)(3) non-profits	X	X
Qualified community development entity under Section 45(D)(c)(1) of Internal Revenue Code	X	X
Central Vermont Regional Planning Council	X	
Coalition Members	X	X

3.2 Which Sites Qualify?

Eligible sites must meet the definition of a brownfield as defined by [CERCLA Section 101\(39\)](#) and receive approval from the CVRPC's EPA Project Officer (PO). Excluded sites include properties listed or proposed for listing on the National Priorities List (NPL), properties subject to CERCLA enforcement actions, and federally owned facilities. For petroleum-contaminated sites, eligibility must be confirmed by DEC or approved by EPA Region 1 if DEC declines to make a determination.

Applicants must also document landowner liability protections (Bona Fide Prospective Purchaser, Contiguous Property Owner, or Innocent Landowner) and complete All Appropriate Inquiry (AAI) in accordance with American Society for Testing and Materials (ASTM) Standard E1527-21 prior to property acquisition. In the Brownfields Law, there are defenses to potential liability under CERCLA § 107 that are important in determining whether a potential borrower or subgrantee may use brownfield funds to clean up a site. The Brownfields Law specifies the following three categories of liability protection defenses:

- Bona fide prospective purchaser (BFPP),
- Contiguous property owner (CPO), and
- Innocent landowner (ILO).

Borrowers and subgrantees who are eligible, or wish to become eligible, to receive a loan or subgrant based on liability protection from CERCLA in one of these three categories must meet certain criteria and comply with any continuing obligations to maintain their status as an eligible borrower or subgrantee. These include, but are not limited to, the following:

- All borrowers and subgrantees asserting a BFPP, CPO, or ILO limitation on liability must perform (or have already performed) AAI as provided for in CERCLA §101(35)(B), before acquiring the property.
- Under 40 CFR 312.20, AAI must be conducted “within one year prior to the date of acquisition of the subject property”, but certain time critical elements must be updated within 180 days prior to acquisition.

The most common way of demonstrating an affirmative defense to CERCLA liability is completing a Phase I Environmental Site Assessment (ESA) prior to acquisition of the property. Common elements of the BFPP, CPO, and ILO defense can be found [here](#).

3.3 Subgrant Eligibility Considerations and Restrictions

In addition to a defense to liability identified above, the CVRPC must take into consideration and document the extent to which a subgrant will:

- Facilitate the creation of, preservation of, or addition to a park, greenway, undeveloped property, recreational property, or other property used for nonprofit purposes.
- Meet the needs of a community that has the inability to draw on other sources of funding for environmental remediation and redevelopment because of small population or low income.
- Facilitate the use or reuse of existing infrastructure.
- Promote the long-term availability of BRLF funds.

The subgrantee must retain ownership of the site throughout the cleanup. For the purposes of this type of agreement, the term “ownership” means fee simple title unless EPA approves of a different arrangement. Once the terms of the subgrant are met and the agreement ends, the statutory ownership requirement also ends. CVRPC may not provide a subgrant to itself or another component of its own unit of government or organization.

3.4 Eligible Sites

A site must meet the definition of a “brownfield site” provided in [CERCLA § 101\(39\)\(A\)](#) to be eligible for funding. Brownfield sites are defined as “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.” For a site to be eligible, the definition considers the primary contaminants to be hazardous or petroleum. These can be contamination from manufacturing sites, automotive body shops, dry cleaners, gas stations, or regulated building materials containing asbestos or lead paint.

3.4.1 Other Eligible Sites

Less common than sites contaminated with hazardous substances or petroleum, the types of sites described in the following subsections are considered brownfields by EPA and generally eligible for BRLF funding from CVRPC.

3.4.1.1 Sites Contaminated by Controlled Substances

BRLF funds may be used to cleanup sites contaminated by controlled substances unless other factors make the site ineligible. A “controlled substance” is defined under the Controlled Substances Act as “a drug or other substance, or immediate precursor, included in Schedule I, II, III, IV, or V of Part B of this title 21 USC § 802). The term does not include distilled spirits, wine, malt beverages, or tobacco.”

These sites may include private residences, formerly used to manufacture or distribute methamphetamines or other illegal drugs, where there is a presence or potential presence of controlled substances or pollutants, contaminants, or hazardous substances (e.g., red phosphorus, kerosene, acids).

3.4.1.2 Mine-Scarred Land

BRLF funds may be used to clean up mine-scarred lands. Mine-scarred lands include the land, associated waters, and surrounding watersheds where extraction, beneficiation, or processing of ores and minerals (including granite quarries) has occurred. Mine-scarred lands may include but are not limited to:

- abandoned surface and deep mines;
- abandoned waste rock or spent ore piles;
- abandoned roads constructed wholly or partially of waste rock or spent ore;
- abandoned tailings, disposal ponds, or piles;
- abandoned ore concentration mills;
- abandoned smelters;
- abandoned cyanide heap leach piles;
- abandoned dams constructed wholly or partially of waste rock, tailings, or spent ore;
- abandoned dumps or dump areas used for the disposal of waste rock or spent ore;
- acid or alkaline rock drainage; and
- waters affected by abandoned metal mine drainage or runoff, including stream beds and adjacent watersheds.

3.5 Sites Not Eligible for Brownfield Funding

The following sites are excluded from the general definition of a “brownfield site” by statute and under no circumstance can receive funding from CVRPC:

- Sites listed, or proposed for listing, on the National Priority List (NPL) (Superfund Sites).
- Sites subject to unilateral administrative orders, court orders, administrative orders on consent or judicial consent decrees issued or entered into by parties under CERCLA.
- Sites that are subject to the jurisdiction, custody, or control of the United States government, except for land held in trust by the United States government for an Indian tribe. Facilities owned by, or under the custody or control of, the federal government are not eligible for brownfields funding. EPA’s view is that this exclusion may not extend to:
 - privately-owned, Formerly Used Defense Sites (FUDS);
 - privately-owned, Formerly Utilized Sites Remedial Action Program (FUSRAP) properties; and
 - other former federal properties that have been disposed of by the United States government.

3.6 Sites Requiring a Property Specific Determination

Certain sites *may* be eligible for funding from CVRPC, but under [CERCLA § 101\(39\)\(C\)](#), these types of properties require a special approval from EPA.

- Properties subject to planned or ongoing removal actions under CERCLA.
- Properties with facilities that have been issued or entered into a unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution Control Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA).
- Properties with facilities subject to RCRA corrective action (§3004(u) or §3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures.
- Properties where there has been a release of Polychlorinated Biphenyls (PCBs) and all or part of the property is subject to TSCA remediation.
- Properties that include facilities receiving monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund.

3.7 Site Eligibility FAQ

Q: I completed a Phase I ESA on the property I own, is it eligible?

A: Maybe. If the time sensitive elements of the Phase I ESA were completed within 180 days *prior* to closing, the owner may qualify as a Bona Fide Prospective Purchaser (BFPP). If the time sensitive elements of the Phase I ESA were not updated within 180 days *prior* to closing, if the report was over a year old, or if the Phase I ESA was completed after acquisition, the site is not eligible for funding under the BRLF.

Q: If an NPL site is deleted from the list, will the site or parts of the site become eligible for a property specific determination?

A: Yes, subject to eligibility approval by EPA.

Q: If a site has only hazardous building materials and there has been no release to the environment, is this site eligible for funding?

A: Yes, subject to eligibility approval by EPA.

4.0 Eligible and Ineligible Use of Funds

The BRLF can cover most reasonable costs needed to clean up a site. Common examples include the following but other cleanup-related costs may also qualify:

- Removing, mitigating, or preventing the release or threat of a release of a hazardous substance, pollutant, contaminant, petroleum product, or controlled substance into the environment.
- Using chemicals and other materials to retard the spread of the release or mitigate its effects.
- Oversight of cleanup activities.
- Excavation, consolidation, or removal of contaminated soils.
- Installation of fences, warning signs, or other security or site control precautions.
- Removal of drums, barrels, tanks, or other bulk containers that contain or may contain hazardous substances, pollutants, or contaminants, including petroleum.
- Installation of drainage controls.
- Removal of source materials, including free product recovery.
- Stabilization of berms, dikes, or impoundments; or drainage or closing of lagoons.
- Containment, treatment, or disposal of hazardous materials and petroleum products.
- Cleanup planning/design, to include development and implementation of institutional controls (ICs).
- Site monitoring activities, including sampling and analysis that are reasonable and necessary during the cleanup process, including determination of the effectiveness of a cleanup.
- Sampling as related to design and implementation (confirmatory sampling) of a selected cleanup plan.
- Minor structural repairs to buildings if integral to clean-up health and safety protocols for workers on site.
- Demolition of structures if the activity is integral to the cleanup.
- Cleanup or decontaminating drug labs.
- Immediate provision of alternative water supply, where necessary, to reduce exposure to contaminated household water and continuing until such time as local authorities can satisfy the need for a permanent remedy.
- Purchasing environmental insurance.

Below is a list of expenses that will not be considered eligible or reimbursed under a BRLF loan or subgrant. (Note, this list is not exhaustive.)

- Property acquisition.
- Purchasing equipment.
- Construction and demolition NOT required to access contamination.
- To pay for a penalty or fine.

- Phase I and II ESAs.
- Pre-cleanup costs (e.g., site assessment, identification, and characterization except for site monitoring activities).
- Plaques and signage for historic sites.
- Costs associated with complying with federal or state laws not required for the clean.
- Federal cost share requirements unless statutorily allowed.
- Paying for a cleanup where the property owner or borrower is potentially liable.
- Lobbying activities.
- Job training.
- Unallowable costs under 2 CFR Parts 200 and 1500.

4.1 Eligibility Use of Funds FAQ

Q: If additional activities are required by DEC for a cleanup, are they eligible expenses?

A: Yes, with the exception of site characterization activities, required by the state are usually eligible expenses for the BRLF. For example, monitoring costs are eligible if that is required by DEC to work toward a Certificate of Completion (COC) for the site cleanup (e.g., multiple years of groundwater monitoring may be required by the state). Similarly, activities required by the state to achieve closure on a tank removal are eligible expenses.

Q: Does CVRPC offer discounted loans or loan forgiveness?

A: Yes, as a matter of policy, EPA allows grantees to offer discounted loans as published in the [October 28, 2005 Federal Register Notice](#). CVRPC may offer discounted loans (i.e., loans where a portion of the principal is forgiven when the terms of the loan agreement are satisfied) to states, political subdivisions, as well as nonprofit organizations. Private, for-profit entities are not eligible for discounted loans. In addition, the above referenced 2005 policy specifies that a discounted loan may not be used in combination with a subgrant at the same site. Current EPA program policy limits the forgiveness on an individual loan to no more than 50% of the principal, but not to exceed \$500,000.

Q: Are sampling costs related to the design and implementation of a selected cleanup plan eligible?

A: No.

Q: If DEC requires placement of clean fill after removal of an UST, is the acquisition and placement of the clean fill an eligible expense?

A: Yes.

Q: Can funds be used to record a deed restriction on a property title?

A: Yes.

5.0 Loan and Subgrant Application Process

5.1 Pre-Application

Interested applicants must submit a completed Site Nomination Form to the CVRPC. A copy of the form is attached as **Appendix A**. Montrose Environmental Solutions, Inc. (Montrose), CVRPC's Qualified Environmental Professional (QEP), will review the funding request and background environmental reports with CVRPC, discuss the project with DEC and EPA, and provide a recommendation for next steps or identify missing information needed from the applicant to process the funding request. Upon issuance of a site eligibility determination from EPA (and DEC, if applicable), the applicant will be notified of eligibility.

5.2 Loan Application

If eligible, the applicant will be asked to complete a Funding Application. A copy of the form is attached as **Appendix B**. An analysis and evaluation of each loan application will be made by the BAC and Executive Committee to determine the level of risk based on the applicant's ability to repay the loan and the value of collateral. Once an applicant is deemed eligible, CVRPC and its review committee will evaluate the project's financial and environmental readiness. The CVRPC Executive Committee will make the final funding decision. Final approval of eligibility must be made by EPA.

If the funding request is declined by the CVRPC Executive Committee, the applicant is notified in writing and CVRPC staff will review the project to determine if restructuring and resubmission of the application is appropriate. If the funding request is approved, a commitment letter will be sent to the applicant that includes the amount, rate, terms, and primary conditions for the loan. CVRPC staff will work with the applicant and CVRPC's legal counsel to facilitate loan closing.

5.3 Subgrant Application

If eligible, the applicant will be asked to complete a Funding Application. A copy of the form is attached as **Appendix B**. An analysis and evaluation of each subgrant application will be made by the BAC and Executive Committee to determine the level of risk. Once an applicant is deemed eligible, CVRPC and its review committee will evaluate the project's financial and environmental readiness. The CVRPC Executive Committee will make the final funding decision. Final approval of eligibility must be made by EPA.

If the funding request is declined by the CVRPC Executive Committee, the applicant is notified in writing and CVRPC staff will review the project to determine if restructuring and resubmission of the application is appropriate. If the funding request is approved, a commitment letter will be sent to the applicant that includes the amount, rate, terms, and primary conditions for the subgrant. CVRPC staff will work with the applicant and CVRPC's legal counsel to execute the subgrant agreement.

6.0 Loan and Subgrant Terms

The terms outlined in this section are effective as of **March ##, 2026** and are subject to change at the discretion of the CVRPC Executive Committee.

Table 2 below provides an overview of EPA programmatic requirements by funding type. Additional information is provided in the subsections that follow the table.

Table 2: Key Differences in Funding Types			
Requirements For:	Loan Eligible	Discounted Loan	Subgrant
Site Ownership	Not Required	Not Required	Required
Intra-Governmental	Allowed In Specific Circumstances	Not Allowed	Not allowed
Can be awarded to for-profit entity	Allowed	Not Allowed	Not Allowed
Federal Procurement Standards at 2 CFR 200.317 through 200.327	Not Required	Not Required	Required
Consultant fee cap 2 CFR 1500.10	Not Required	Not Required	Required
Indirect Costs	Not Allowed	Not Allowed	Allowable, 5% administrative cost cap.

6.1 Loan Agreements

The Loan Agreement between CVRPC and the Borrower shall dictate the loan terms and conditions and control the promissory note, and such other documents as may be necessary to complete the particular loan. Final lending decisions and loan negotiations will be conducted by CVRPC with the advice of Legal Counsel. Once the Loan Agreement has been negotiated and agreed upon, a Closing Date will be scheduled.

The Fund Manager shall work with Legal Counsel and the Loan Servicing Agent to prepare draft loan documents for review by CVRPC's BAC and Executive Committee, EPA and the Borrower.

- 1) **Loan Amount.** There is no minimum or maximum loan amount at this time. The value of the loan amount will depend upon the amount of funding available in the BRLF. However, the loan amount may not exceed **90%** of the total approved cleanup cost.
- 2) **Interest Rates.** The BRLF is intended to be a flexible financing tool. The interest rate may be as low as **0%** for non-profits and municipalities or as high as the prime rate, dependent upon the loan term and other project characteristics.
- 3) **Terms.** Loans for environmental remediation typically have terms up to **ten years**. The actual term is negotiable, but the deal must justify the maximum term if requested. **CVRPC will give priority to short term (6-24 months) "bridge" style loans. Interest only payments may be made available for the first year; however, all loans will be fully amortized by a daily rate.**
- 4) **Loan Discounts.** At the discretion of the CVRPC's BAC and Executive Committee, loans for non-profits and municipalities may be discounted up to **fifty percent (50%)** but not to exceed \$500,000. The discount will only be applied upon the site receiving a Certificate of Completion (COC) or equivalent from the DEC Project Manager. Per EPA rules, discounted loans cannot be given to private or for-profit entities.

- 5) **Security.** CVRPC will utilize prudent lending practices to evaluate whether sufficient and adequate collateral is available to secure all BRLF loans. It will usually be in the form of liens on the assets financed, including fixed assets such as machinery and real estate, accounts receivable, inventory and lease assignments. Liens upon other non-project assets of the Borrower or personal guarantees may also be used to secure the loan. CVRPC's preference is to have first mortgage on property. If asked to subordinate, CVRPC will seek additional collateral including liens on real or personal property.
- 6) **Promissory Note.** BRLF programs are to provide for the recapture of BRLF funds to be returned for future loan awards. The loan principal and interest of a BRLF loan shall be paid in accordance with any and all applicable loan documents. The entire amount of principal outstanding shall be due and payable in full together with any applicable accrued interest no later than on the expiration of the loan term. Loan agreements are to provide for equity participation on behalf of the Borrower if deemed possible.
- 7) **Cost Share Requirement.** Evidence of a cost share of at least 10% of the loan amount may be required of all Borrowers. The cost share contribution must be for costs that are eligible and allowable under the Cooperative Agreement between CVRPC and EPA and must be supported by adequate documentation. The cost share may be in the form of a contribution of money, labor, materials, or services from a non-federal source. Additionally, a "hardship" waiver may be considered for municipalities and non-profit corporations on a case-by-case basis.
- 8) **Fund Disbursements.** CVRPC will provide funding using an "actual expense" disbursement approach requires the borrower to submit documentation of the expenditures to CVRPC in order for CVRPC to request payment from EPA. This includes submittal of invoices describing the work completed as well as proof of payment for the invoices. Upon invoice approval, CVRPC will process the disbursement and typically provide payment within 30-45 days. Disbursement requests may be made by the borrower to CVRPC no more once per month.
- 9) **Completion Date.** All BRLF projects shall be completed in a timely manner (preferably with a maximum remediation project duration of eighteen [18] months). A remediation project is considered "complete" once a Corrective Action Construction Completion Report (CACCR), or equivalent, has been submitted and approved by the DEC Site Manager and a COC, or equivalent, is provided by DEC. If circumstances require additional time for completion, a memorandum shall be written and placed in the loan file explaining the reasons for the delay. With the approval of DEC and EPA, CVRPC may extend the deadline for completion. It is within CVRPC's discretion to suspend or end additional funding if a project is unreasonably delayed. If the BRLF funds are not expended within the allocated time, the amount of the loan not expended may be reallocated to the BRLF to loan to other applicants.
- 10) **Closing the Loan.** The closing date will be scheduled at the convenience of all parties. A list of items necessary for closing will be provided to the Borrower prior to closing.

6.2 Subgrant Agreements

The Subgrant Agreement between CVRPC and the subrecipient shall dictate the grant terms and conditions. Final funding decisions and negotiations will be conducted by CVRPC with the advice of the BRLF Executive Committee and Legal Counsel.

The Fund Manager shall work with Legal Counsel to prepare draft subgrant documents for review by CVRPC's BAC, Executive Committee, EPA and the subrecipient.

- 1) **Grant Amount.** There is no minimum grant award at this time. A maximum grant award of up to \$500,000 may be requested by municipalities and non-profit corporations. The value of the grant amount approved will depend on the amount of funding available in the BRLF. However, the grant amount may not exceed 90% of the total approved cleanup cost.
- 2) **Cost Share Requirement.** Evidence of a cost share of at least 10% of the grant amount may be required of the subrecipient. The cost share contribution must be for costs that are eligible and allowable under the Cooperative Agreement between CVRPC and EPA and must be supported by adequate documentation. For municipalities and non-profit corporations, the cost share may be in the form of a contribution of money, labor, materials, or services from a non-federal source. Additionally, a "hardship" waiver may be considered for municipalities and non-profit corporations on a case-by-case basis.
- 3) **Completion Date.** All BRLF projects shall be completed in a timely manner (preferably with a maximum remediation project duration of eighteen [18] months). A remediation project is considered "complete" once a CACCR, or equivalent, has been submitted and approved by the DEC Site Manager and a COC, or equivalent, is provided by DEC. If circumstances require additional time for completion, a memorandum shall be written and placed in the loan file explaining the reasons for the delay. With the approval of DEC and EPA, CVRPC may extend the deadline for completion. It is within CVRPC's discretion to suspend or end additional funding if a project is unreasonably delayed. If the BRLF funds are not expended within the allocated time, the amount not expended may be reallocated to the BRLF to award to other applicants.

7.0 Community Involvement Requirements

Community involvement is an essential component of the BRLF. Through this process, the public has an opportunity to provide input on the proposed site cleanup and plans for redevelopment, to comment on the required documents drafted in preparation for the environmental cleanup and to have these comments considered in part of the final cleanup decision.

Community involvement activities must be initiated prior to the cleanup of a site and continue throughout cleanup. Final cleanup decisions must not be made prior to carrying out the required community involvement activities. BRLF loan or grant funds may be used to support cleanup planning and community involvement activities. All environmental cleanups require a site-specific Community Involvement Plan (CIP) that includes providing reasonable notice, and the opportunity for public involvement and comment on the proposed cleanup options under consideration for the site. All information, including responses to public comments and administrative records, may be made available to the public to the extent consistent with 2 CFR § 200.338 and applicable state, tribal, or local law. Requirements for cleanup planning and community involvement are summarized below. A CIP template can be provided to the subrecipient upon request.

7.1 Preparing the Cleanup Plan

7.1.1 Analysis of Brownfield Cleanup Alternatives / Evaluation of Corrective Action Alternatives (ABCA/ECAA)

An ABCA or ECAA is required for all cleanup response actions funded by the BRLF, including lead and asbestos abatement. The ABCA or ECAA must consider the site characteristics, surrounding environment, land-use restrictions, potential future uses, and cleanup goals in order to document that the appropriate type of cleanup is selected to address the site. The ABCA or ECAA must include the following elements:

- Information about the site and contamination issues (i.e., contaminants of concern, exposure pathways, contaminant sources, etc.); cleanup standards; applicable laws; alternatives considered; and the proposed cleanup.
- A comparative analysis of the alternatives being considered using the criteria of effectiveness, implementability and the cost of each alternative. At a minimum, the ABCA or ECAA must include a comparison of the proposed cleanup action and the “no action” alternative. As appropriate, additional cleanup alternatives may be included in the analysis. The ABCA or ECAA should discuss whether/ how each alternative would achieve cleanup standards and applicable laws.
- Cleanup method chosen must be based on this analysis.

DEC and EPA must approve the ABCA or ECAA, except for lead and asbestos abatement projects which only require EPA approval.

7.1.2 Corrective Action Plan (CAP)

A DEC- and EPA-approved CAP is required for all cleanup response actions funded by the BRLF, except for lead and asbestos abatement which only requires EPA approval. The CAP and ABCA/ECAA may be completed as one document providing they satisfy the requirements of the DEC and the EPA, or as separate documents.

7.2 Facilitating Community Involvement

The Subrecipient must designate a community relations spokesperson that is the responsible for establishing the Administrative Record (described below), hosting a public meeting, and responding to any comments received regarding the proposed cleanup alternatives.

The loan or grant Subrecipient must prepare a Community Involvement Plan (CIP) for EPA approval. The CIP should outline the steps to provide notice of proposed cleanup, opportunities for public involvement, process for responding to public comments, and the administrative records that are available to the public.

7.3 Establishing the Administrative Record

CVRPC will maintain an Administrative Record (also referred to as an “information repository”) for the site. The Subrecipient, through a term in the loan/subgrant documents, shall be required to provide the documents to CVRPC. The Administrative Record includes all relevant site information and documents such as site investigation reports, the ABCA or ECAA, and the CAP. The administrative record may also include appropriate sections of loan or subgrant documents necessary to ensure that cleanup requirements are met.

The Administrative Record must be available for review at a location convenient to the public (such as CVRPC’s BRLF project webpage) and will be specified in the CIP and must include:

- The name of the Subrecipient and the proposed cleanup activities.
- An ABCA or ECAA (or equivalent).
- A site-specific CIP for involving and informing the community during the cleanup process.
- Documents or other information that form the basis for selection of a cleanup. Such information may include sampling data, quality control and assurance documentation, site investigation reports, Phase I and Phase II ESA Reports, public health evaluations or risk assessments, and other technical and engineering documents as deemed appropriate by CVRPC or the Subrecipient.
- Documentation of community involvement activities (i.e. meeting agendas and/or meeting minutes).
- Documenting responses to public comments via the Decision Document (described in Section 5.4).
- Verification that cleanup is complete in the form of a Corrective Action Construction Completion Report (CACCR) and/or Certificate of Completion (COC) issued by DEC.

Prior to selecting the final cleanup action for the site, the loan or grant Subrecipient is required to make the ABCA or ECAA available for public comment for a minimum of 30 days and a public meeting must be held during the public comment period to discuss the proposed cleanup and solicit comments from interested parties. The meeting shall be publicly advertised with at least 15 days notice. The Subrecipient may request to include the public comment forum as an agenda item of the local Town’s regularly scheduled SelectBoard meeting. Publishing one public notice in the local newspaper is sufficient advertising for the public meeting provided it is advertised at least 15 days prior to the date of the meeting.

Written comments received as well as oral comments received (via the public meeting or other means), must be documented and responded to within two weeks by the community relations spokesperson.

If the CAP is a separate document, public comment requirements shall be solicited as dictated by DEC. Typical requirements include posting the CAP on DEC’s Environmental Notice Bulletin (ENB) for a minimum of 30 days.

7.4 Issuing the Decision Document

The Decision Document shall include a response to all relevant written and oral comments received during the public comment period and document any change(s) to the final cleanup plan based on the comments received. A Decision Document template can be provided to the subrecipient upon request.

8.0 Environmental Cleanup and Oversight

Each cleanup must follow federal and state environmental standards. Projects require an EPA and DEC-approved ECAA which must also meet EPA's requirements for an ABCA, as well as a Site-Specific Quality Assurance Project Plan or Sampling and Analysis Plan (SSQAPP or SAP). If these documents do not exist, CVRPC and its environmental consultant may assist with preparing them at no cost to borrowers.

Cleanups, if eligible, should be conducted under the oversight of DEC through enrollment in the Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) Program. All activities must comply with applicable federal cross-cutting requirements, including (but not limited to) the Non-Discrimination under Title VI of the Civil Rights Act, prohibitions on covered telecommunications equipment, the Endangered Species Act, National Historic Preservation Act (NHPA), Davis-Bacon Act, and the Build America Buy America Act (BABA). Cleanups not regulated by DEC will be reviewed by the EPA to ensure the protection of human health and the environment.

8.1 Environmental Cleanup and Oversight FAQ

Q: If my site was already cleaned up to commercial/industrial standard and received a COC, can I use BRLF funds to complete additional remediation to a residential standard?

A: Yes. If the proposed reuse requires additional cleanup the BRLF can be used to help.

Q: What happens if a BRLF Loan must be terminated and the cleanup is not complete?

A: If the cleanup is not complete at the time of termination, CVRPC will:

- Document the difference between the amount loaned to the borrower and the cost of cleanup that took place prior to the default;
- secure the site to ensure public safety; and
- inform EPA and DEC.

9.0 Cross-Cutting Federal Requirements

Projects funded through the BRLF are subject to federal cross-cutting requirements in [EPA's General Terms and Conditions](#). These include, but are not limited to, Non-Discrimination under Title VI of the Civil Rights Act, prohibitions on covered telecommunications equipment, the Endangered Species Act, National Historic Preservation Act, Davis-Bacon Act, and the Build America Buy America Act described below. For additional information on cross-cutting requirements visit <https://www.epa.gov/grants/epa-subaward-cross-cutter-requirements>.

- **Non-Discrimination under Title VI of the Civil Rights Act:** Non-discrimination refers to the legal requirement that no person in the United States may be excluded from participation in, denied benefits of, or subjected to discrimination on the basis of race, color, or national origin in any program or activity that receives federal financial assistance.
- **Prohibitions on Covered Telecommunications Equipment:** All projects funded by EPA grants must follow federal rules that restrict using or obtaining certain telecom or video-surveillance equipment made by specific, high-risk foreign vendors.
- **Endangered Species Act:** All projects funded by EPA grants must complete Section 7 consultation requirements before cleanup may begin.
- **National Historic Preservation Act (NHPA):** All projects funded by EPA grants must complete Section 106 consultation requirements before cleanup may begin. CVRPC must consider the effect of grant-funded cleanup activities on any historic properties included on or eligible for inclusion on the National Register of Historic Places (NRHP) or "cultural resources." The Section 106 of NHPA process includes the following steps:
 - Step 1: Initiate Review.
 - Step 2: Determine if the undertaking has the potential to cause an effect.
 - Step 3: Determine if the property is historically or culturally significant.
 - Step 4: Mitigate, if necessary.
- **Davis-Bacon Act of 1931:** CERCLA § 104(g) requires that Subrecipients comply with the prevailing wage rate requirements under the Davis-Bacon Act of 1931 for construction, repair or alteration contracts "funded in whole or in part" with funds provided under the RLF agreement. The Subrecipient must obtain recent and applicable wage rates from the U.S. Department of Labor and incorporate them into the construction, alteration or repair contract. The Subrecipient shall certify that all solicitations and contracts contain the clauses required by the Davis Bacon Act (29 CFR 5.5) and will submit payroll information and "Statement of Compliance" regarding payment of Davis-Bacon wages on a weekly basis to CVRPC's QEP.
- **Build America, Buy America (BABA):** BRLF-funded cleanup activities that involve construction (such as soil removal, barrier installation, backfill, lead and asbestos abatement, etc.) are most likely to trigger BABA. Effective May 14, 2022, the funds made available under federal financial assistance programs for infrastructure may, "be obligated for a project unless all of the iron, steel, manufactured products, and construction materials used in the project are produced in the United States," where the "project" means, "any activity related to the construction, alteration, maintenance, or repair of infrastructure, buildings, or real property in the United States." Waivers may be permitted under certain circumstances approved by EPA. (Note: Made in America [MIA] and BABA are related but not the same. MIA is applicable to federal contracting. BABA applies to federal financial assistance recipients. Additional information is available at <https://www.epa.gov/baba>.)

10.0 Reporting, Monitoring, and Recordkeeping

Borrowers and subgrantees must submit quarterly progress reports to CVRPC showing cleanup spending and progress. CVRPC compiles these reports for EPA using its ACRES database and financial reporting forms. All project records must be kept for at least three years after the grant closes.

All project related records for BRLF activities must be retained for at least three years by the borrower or subgrant recipient, or longer if required by federal regulations. CVRPC will maintain all project files for a minimum of three years after the Cooperative Agreement closes.

Figures

- Figure 1 CVRPC Jurisdiction
Figure 2 BRLF Process Flowchart

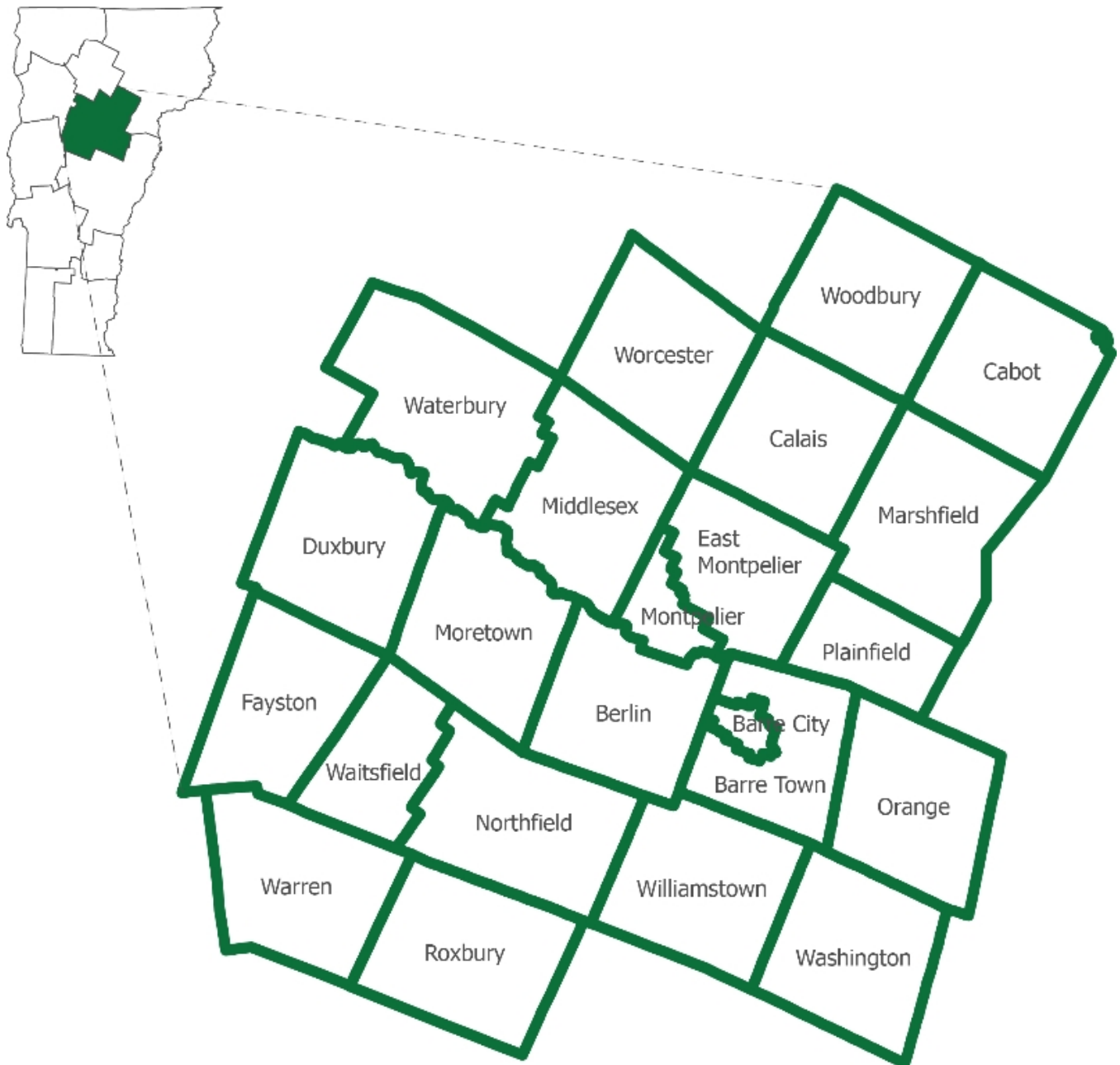
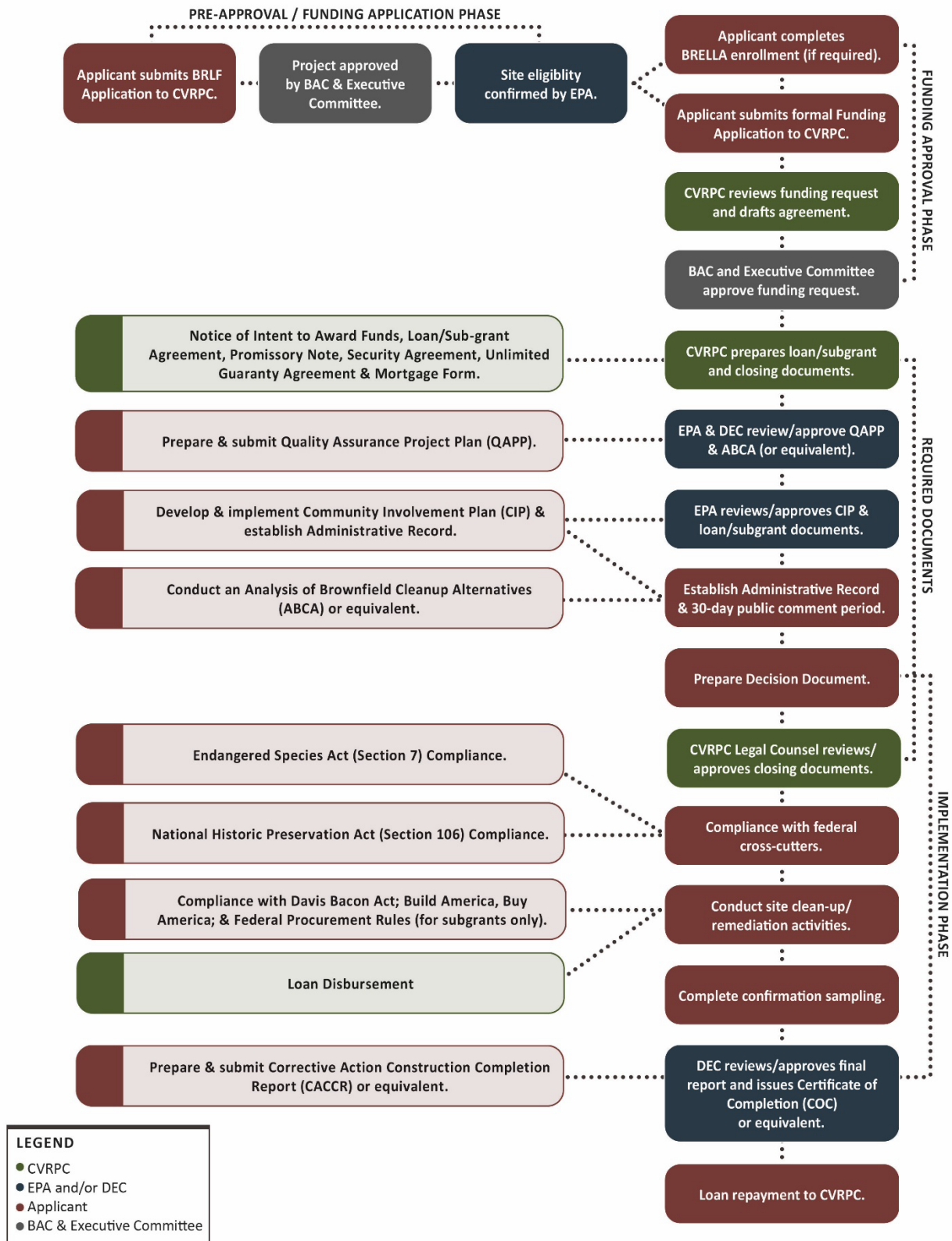
Figure 1 - CVRPC Jurisdiction

Figure 2 - BRLF Process Flowchart



APPENDIX A

Site Nomination Form

APPENDIX B

Funding Application

APPENDIX C

Loan Agreement Template

APPENDIX D

Project Evaluation Criteria

APPENDIX E

EPA Brownfield RLF Terms & Conditions

CVRPC BROWNFIELD PROGRAM UPDATES

July 16, 2026

These updates keep the Brownfields Advisory Committee informed about programming activities, potential modifications to state and federal programs and practices, and other news that may be of interest. CVRPC Brownfields Program receives funding from Mount Ascutney Regional Planning Commission through a subgrant agreement for assessments. This subgrant agreement is active through June 30, 2026. The program also received funding through EPA Brownfields Assessment Grant and an EPA Brownfields Revolving Loan Fund grant. The project period for the Brownfields Coalition Assessment Grant is 5/16/2025 - 09/30/2029. The project period for the Brownfields Revolving Loan Fund is 05/16/2025 - 09/30/2030. Acronyms and brownfield-related terms are defined at the end of this document. Please feel free to share additional acronyms or terms you would like explained.

Attended Workshops and Conferences

Vermont Environmental Consortium (VEC) Spring Conference. April 30th, 2026, at the Film House @ Main Street Landing, Burlington. The last session of the day includes *Brownfield Funding Stack* and *CHIP and Brownfields*. More information can be found here: [Events — Vermont Environmental Consortium](#)

Grow America - **RLF Essentials: Lending Basics**. March 5, 2026

Grow America - **RLF Essentials: Understanding the Development Process**. April 7, 2026

Maryland Department of Planning – **Brownfield Planning Principles for Sustainable, Equitable Growth**. April 14, 2026

Grow America Revolving Loan Funds Workshop was in Portland, Maine May 28-29, 2026. Peter Carbee and Eli Toohey attended.

Brownfields Coalition of the Northeast (BCONE) is hosted a Northeast Sustainable Communities Workshop in Springfield, Massachusetts on June 16-17, 2026. Information can be found here; nscwonline.com

Upcoming Workshops and Conferences

Many free Grow America office hours and workshops can be found here; [The Grow America EPA-supported Technical Assistance for Brownfields Collaboration – Grow America EPA RLF TAB](#) – signed up for **RLF Essentials: Basic Real Estate Finance & Underwriting**. July 21, 2026

Brownfields Advisory Committee

The Revitalizing New England Brownfields Summit 2026 is December 9th and 10th @ the Newport Marriot in Newport Rhode Island. More information can be found here; [2026 Brownfields Summit](#)

The next National Brownfields Conference is May 25-28, 2027 in Salt Lake City, Utah. Find more information on that here; [2027 National Brownfields Training Conference](#)

Consultant Update

On April 22nd, 2026 (aligned with Earth Day) Montrose Environmental Solutions changed its name to Onterris. The name change is coupled with an entire rebranding of our company's look that you can see by viewing their new [website](#). To be clear, this is not a new company. We are the same company with a new name. Our new name combines *On*, motion and intent, with *terris*, meaning Earth. The name reflects finding science-based solutions that are also practical and locally rooted. The company mission is simple – we are for planet and progress. Our rebranding was inspired by the “pale blue dot” image captured by NASA's Voyager, four billion miles away. While our rebranding has been planned for over a year, the recent images from the Artemis II of our home Earth reinforce this same perspective and responsibility.

Importantly – their contract terms and payment instructions do not change with this new name. They have set up a [resources webpage](#) on their website to support our clients through this transition and have made available copies of their name change documentation, insurance, and tax information. (Note: Their ownership, tax identification number and address remain the same.) We checked in with the EPA and this name change does not impact our grant agreements or terms and conditions.

Active Sites

EPA Brownfields Assessment Coalition Grant Sites

707 Stonecutters Way, Montpelier

This site is located at 707 Stonecutters Way (the old RK Myles lo, next to the Hunger Mountain Coop). In December 2025 the Coop submitted a site nomination form requesting funding of a Supplemental Phase II ESA (AKA Supplemental Site Investigation). The project is BRELLA enrolled, had a Phase I done prior to the transfer to the Hunger Mountain Coop and a Phase II done by Stone Environmental in June 2025. Exceedances of VOCs, PAHs and heavy metals were found, and a Supplemental Site Investigation was recommended. The Brownfields Advisory Committee passed a motion to recommend to the CVRPC Board of

Brownfields Advisory Committee

Commissioners' Executive Committee to fund the Supplemental Phase II. The site has been approved by the EPA.

SMS #:	2025-5528
Reuse:	TBD
Owner:	Hunger Mountain Coop
Developer:	TBD
Assessment Activity:	Requested Supplemental Site Investigation
Assessment Status:	Phase I ESA was completed in April 2025, Phase II ESA completed in June 2025. Site eligibility approved by EPA as of April, 2026.
Funds recommended:	Estimate \$55,203.35, estimates plus 20% contingency is on agenda for 6/5/26 BAC meeting.
Contractor:	Onterris/Stone Environmental
BRELLA status:	Enrolled

Update: 707 Stonecutters Way has completed Phase I and Phase II ESAs and is BRELLA enrolled. During the January 15, 2026 Brownfields Advisory Committee the advisory committee recommended a Phase II Supplemental for the site. The site has been approved by the EPA as of April, 2026. The recommendation to fund with the estimate plus contingency is on the agenda for the June 5, 2026 BAC meeting.

Next Steps: Include the project in the next CVRPC Board of Commissioners' Executive Committee meeting. Work with Onterris, Stone Environmental, DEC and EPA to get Supplemental Phase II ESA completed.

203 Country Club Road, Montpelier

SMS #:	2022-5116
Reuse:	Housing and Community Center
Owner:	City of Montpelier
Developer:	TBD
Assessment Activity:	BAC made the recommendation for the CVRPC Board of Commissioners to fund a Supplemental Phase II ESA (12-18-2025 Meeting).
Assessment Status:	Awaiting EPA Site eligibility approval prior to CVRPC Board of Commissioners' Executive Committee approval.
Funds recommended:	\$86,928.85, estimates plus 20 % contingency is on agenda for 6/5/26 BAC meeting.
Contractor:	Onterris/Stone Environmental
BRELLA status:	Enrolled

Brownfields Advisory Committee

Update: 203 Country Club Road has completed the site nomination form and gone through site selection process. During the 12/18/25 Brownfields Advisory Committee the committee made the recommendation to the CVRPC Board of Commissioners to fund a Phase II Supplemental ESA. The Site Eligibility has been approved by the EPA after changes were made and it was resubmitted in March, 2026. The recommendation to fund with the estimate plus contingency is on the agenda for the June 5, 2026 BAC meeting.

Next Steps: Include the project in the next CVRPC Board of Commissioners' Executive Committee meeting. Work with Onterris, Stone Environmental, DEC and EPA to get Supplemental Phase II ESA completed.

150 Ayers Street, Barre City

This site is a new project located at 150 Ayers Street in Barre City (a lot adjacent to Spaulding High School and the current Central Vermont Technical Career Center). In January 2026 CVTCC submitted a site nomination form requesting funding of Phase I ESA. They are not yet BRELLA enrolled but have been advised to apply. The intended reuse is for Central Vermont Technical Career Center programming. The site has been approved by the EPA as of April, 2026.

SMS #:	TBD
Reuse:	TBD, Programming for Central Vermont Career Center
Owner:	Allen Jones & Sons, prospective owner CVTCC
Developer:	TBD
Assessment Activity:	Requested Phase I
Assessment Status:	No known prior assessment
Funds recommended:	\$5,500, estimate plus 10% contingency, is on agenda for 6/5/2026 BAC meeting.
Contractor:	Onterris/Stone Environmental
BRELLA status:	Pre-application, not eligible unless 2 owners removed from responsible party

Update: 150 Ayers Street has completed the site nomination form and gone through site selection process. During the 2/19/26 Brownfields Advisory Committee, the committee made the recommendation to the CVRPC Board of Commissioners to fund a Phase I ESA. The Site Eligibility Checklist form has been approved by the EPA as of April, 2026. The recommendation to fund the estimated amount is on the agenda for the June 5, 2026 BAC meeting. Onterris will do the Phase I.

Brownfields Advisory Committee

Next Steps: Include the project in the next CVRPC Board of Commissioners' Executive Committee meeting. Work with Onterris, Stone Environmental, DEC and EPA to get Supplemental Phase II ESA completed.

143 North Main Street, Barre City

This is a new site that has been vacant for a long time ~15 years. Barre Area Development Corporation hired Weston & Sampson to do a Phase I which was finalized January 8, 2026. Findings of that report included;

- Petroleum-impacted soils left in place at the Subject Property associated with SMS #1996-2006.
- Likely impacts associated with the historical presence of several dry cleaning and auto repair facilities in the vicinity and upgradient of the Subject Property.
- Likely impacts associated with a drum in the basement of the Subject Property.
- Documented petroleum and chlorinated-solvent impacts to the Subject Property associated with the adjoining property (SMS #2014-4500).
- The likely presence of arsenic, lead, and PAHs in soil based on the Subject Property's location in a VTDEC-designated Urban Background Area.
- The likely presence of hazardous building materials associated with the Subject Property building.
- Portions of the Subject Property could not be observed due to flooding and structural issues, precluding full evaluation of potential RECs in these areas.

BADC helped raise funds for Barre City to purchase which they did on 1/16/2026. Weston & Sampson's Phase I Report recommends a Phase II.

SMS #:	2025-5540
Reuse:	Mixed Use
Owner:	Barre City
Prospective Owner:	TBD
Developer:	City is pursuing RFQ to identify potential developers
Assessment Activity:	Site nomination form requesting a Phase II
Assessment Status:	Site was recommended to send application for eligibility to the EPA during their 3/19/26 BAC meeting. Site was approved by the EPS as of April, 2026
Funds recommended:	Estimate \$4,000 for Work Plan development (estimate for Phase II will come out of this)
Contractor:	Onterris
BRELLA status:	BRELLA enrolled

Brownfields Advisory Committee

Update: 143 N. Main Street, Barre has completed the site nomination form and gone through site selection process. During the 3/19/26 Brownfields Advisory Committee the committee made the recommendation to apply for EPA Brownfields site eligibility for a Phase II ESA. The Site Eligibility has been approved by the EPA as of April, 2026. The recommendation to fund the estimated Phase II Work Plan Development is on the agenda for the May 21, 2026 BAC meeting and the recommendation to fund the estimated amount was approved during the June 5, 2026 BAC meeting.

Next Steps: Include the project in the next CVRPC Board of Commissioners' Executive Committee meeting. Work with Onterris, Stone Environmental, DEC and EPA to get Phase II ESA completed.

Mount Ascutney Regional Commission Assessment Funds FY24 Sites

Our Mount Ascutney Regional Commission Assessment Funds FY24 have been closed. We ended up funding 5 projects through 4 contracts as follows;

Assessment Phase	Project Name	Project Address	Amount Funded
Phase II	Country Club Road	203 Country Club Road, Montpelier	\$62,984.95
Supplemental Site Investigation	Quality/Speranza Inn	173 South Main Street, Barre City	\$13,372.42
Corrective Action Plan Planning	CVSWMD Administrative Offices and Hazardous Waste Depot	300-302 Granger Road, Berlin	\$8,275
Phase Is	Waterbury FEMA Buyouts	33 & 35 North Main Street, Waterbury	\$2,000

Program Outreach

Continue to outreach to prospective sites, finance partners, real estate partners, and municipal leaders about CVRPC Brownfields Program and current funds available.

Work Plan and Budget

Mount Ascutney Regional Commission Assessment Subaward - FY24

Closed out in April/May 2026

EPA Brownfields Coalition Assessment and Revolving Loan Fund Grants

<u>Grant</u>	<u>Available Balance</u>	<u>Drawdown Amount requested</u>	<u>Period of Funding</u>
<u>Coalition Assessment</u>	<u>\$1,173,154.73</u>	<u>\$26,845.27</u>	<u>May 1, 2025- March 31, 2026</u>
<u>Revolving Loan Fund</u>	<u>\$985,423.55</u>	<u>\$14,576.45</u>	<u>May 1, 2025- March 31, 2026</u>

We have submitted our first drawdown for both Coalition Assessment Grant and Revolving Loan Fund Grant Funds (as noted in table above). Funding through EPA Brownfields Assessment Grant and an EPA Brownfields Revolving Loan Fund grant is for the following periods, 5/16/2025 - 09/30/2029 and 05/16/2025 - 09/30/2030, respectively.

Program updates

Ongoing EPA Coalition Assessment Grant Work:

- Sites recommended for assessment being monitored
 - 203 Country Club Road, Montpelier – During the 12/18/25 Brownfields Advisory Committee the committee made the recommendation to the CVRPC Board of Commissioners’ Executive Committee to fund a Phase II Supplemental ESA. Property Access Agreement has been completed, and Supplemental Phase II is being reviewed by the EPA for site eligibility. Site Eligibility Checklist was resent as it was originally sent as co-mingled which is not eligible. The new Site Eligibility Checklist was approved in April, 2026 and the recommendation to the CVRPC Executive Committee to fund the estimated amount for a Supplemental Site Investigation (plus a 20% contingency) is a requested for the June 5, 2026 BAC meeting. Stone Environmental and Onterris will be the environmental consultants doing the assessment.
 - 707 Stonecutters Way, Montpelier – BAC made the recommendation to fund during the 1/15/26 meeting. The site eligibility checklist has been approved as of April, 2026. Property Access Agreement has been completed. The recommendation to the CVRPC Executive Committee to fund the estimated

Brownfields Advisory Committee

amount for a Supplemental Site Investigation (plus a 20% contingency) is on the agenda for the June 5, 2026 BAC meeting. Stone Environmental and Onterris will be the environmental consultants doing the assessment.

- 150 Ayers Street, Barre City – BAC made the recommendation to fund to the CVRPC Board of Commissioners’ Executive Committee a Phase I during their 2/19/26 meeting. Site eligibility checklist has been approved by the EPA as of April, 2026. Property access agreement is being prepared. The recommendation to the CVRPC Executive Committee to fund the Phase I is on the agenda for the June 5, 2026 BAC meeting. Onterris will be the environmental consultant doing the assessment.
- 143 Main Street, Barre City – BAC recommended to send application for site eligibility to the EPA during their 3/19/26 BAC meeting. Site eligibility checklist has been approved as of April, 2026. The recommendation to the CVRPC Executive Committee to fund the Phase II SSI is on the agenda for the June 5, 2026 BAC meeting. Onterris will be the environmental consultant doing the work plan development.
- Outreach for potential site nominations

The owner of Slopestyle reached out about the potential purchase of the House of Tang Building at 114 River Street in Montpelier. I shared information about the Brownfields program and the process.

Ongoing Revolving Loan Fund Work:

- Request for Proposals for Financial Services to help manage the CVRPC Brownfields Revolving Loan Fund has been reposted and were due July 14, 2026. We received two proposals, one from Adaapta and one from Vermont Economic Development Authority (VEDA). We will be reviewing these proposals and choosing a financial services provider for BRLF program.
- Draft of Revolving Loan Fund Program Manual has been presented to BAC (3/19/26 meeting), terms, process and decision trees as well as recommended changes to RLF Program Manual Draft will be on the agenda for July’s BAC meeting.
- The goal is to have the Revolving Loan Fund active by September, 2026

Brownfield Assessment Activities		
Acronym	Assessment Activity	Description
Phase I ESA*	Phase I Environmental Site Assessment	-Background information gathering and historical records review -Visual site inspections -Other requirements according to ASTM standards

Phase II ESA	Phase II Environmental Site Assessment	-Subsurface Soil Sampling -Groundwater Sampling -Ecological Assessment (if necessary) -Quality Assurance Project Plan (QAPP) required by EPA
Supplemental Phase II ESA	Supplemental Phase II Environmental Site Assessments	-Subsurface soil sampling and groundwater sampling to determine the extent of contamination found in the initial Phase II ESA
SSQAPP**	Site Specific Quality Assurance Project Plan	- a document that outlines the procedures that those who conduct a monitoring project will take to ensure that the data they collect and analyze meets project requirements. - invaluable planning and operating tool that outlines the project's methods of data collection, storage and analysis
HBM	Hazardous Building Materials Assessment	- Assessments for the hazardous materials that impact building use, renovation or demolition. - Determines if hazardous substances are present and in what quantities, and then develop options and costs for management or removal.
ECAA	Evaluation of Corrective Action Alternatives	- Evaluation of remediation options and associated costs, while balancing environmental protection and site redevelopment goals - Identification of redevelopment scenarios - Identification of remedial alternatives - Engineering evaluation of remedial alternatives and selection of preferred alternative - Required by DEC to be included in all DEC approved Corrective Action Plans
CAP	Corrective Action Planning Activities	A plan detailing the specific remedial actions necessary to implement the preferred alternative selected in the ECAA process.
Notes: *Phase I ESAs for current owners of a property may be eligible projects. This would be reviewed by DEC on a project basis as this funding is not intended to benefit potentially liable parties. **This is State funding so SSQAPPs are not needed. However, the expense may be eligible if a SSQAPP is needed, such as if state funding is partnered with federal funding for the project. This can be determined on a project basis.		