

**EPA REGION 4
FY2023 BROWNFIELDS CLEANUP REVOLVING LOAN FUND (RLF)
COOPERATIVE AGREEMENT WORKPLAN**

FOR

Brownfield Revolving Loan Program Louisville Metro

Period of Performance (5 years): October 1, 2023 – September 30, 2028

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Submitted by

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Table of Contents

Section 1.0. – Project Overview	3
1.1 Recipient Name.....	3
1.2 Project Background	3
1.3 Goals and Objectives.....	3
1.4 Project Team Structure & Responsibilities	5
1.5 Pre-Award Costs (if applicable)	6
Section 2.0. - Project Tasks	7
Task 1 - Project Oversight & Fund Management	7
Task 2 – Travel & Training	7
Task 3 – Community Involvement & Outreach	8
Task 4 – Loans & Grants.....	8
Task 5 – Cleanup Oversight.....	9
Task 6 – Project Reporting & Closeout.....	9
Section 3.0. - Schedule of Milestones & Deliverables.....	12
Section 4.0. - Budget Summary and Budget Table	13
Attachment A: EPA Brownfield Program-Specific Budget Notes on Administrative and Programmatic Costs	14
Attachment B: EPA Budget Development, Procurement, & Related Guidance	15

Section 1.0. – Project Overview

1.1 Recipient Name

Louisville-Jefferson County Metro Government

1.2 Project Background

Beginning in 2007, Louisville-Jefferson County Metro Government began its Brownfields Revolving Loan Fund (RLF) program. Applicants and project sites were screened by Louisville Metro's Brownfields Manager. Subgrants to clean up properties being developed by non-profit organizations were awarded directly by departmental staff. Repayable loans were administered through the Metropolitan Business Development Corporation (METCO) Revolving Loan Fund Program. (Louisville-Jefferson County Metro Government serves as fiscal agent of METCO.) METCO administers several, restricted RLFs including those funded by the EDA, DOE, and EPA.

Since 2007, the program has approved three cleanup loans totaling over \$2.4 million. The program has also granted \$864,800 to three non-profit organizations for clean-up activities prior to property development. Program income has been used to fund clean-up activities on properties controlled by the recipient.

Since 2003, Louisville-Jefferson County Metro Government has also received \$1.65 million in EPA Brownfields grant funds for assessment and planning activities.

1.3 Goals and Objectives

a. EPA Strategic Plan

This assistance agreement supports the following EPA strategic goal and objective:

Goal 6: Safeguard and Revitalize Communities and 6.1: Clean Up and Restore Land for Productive Uses and Healthy Communities.

The Brownfields Revolving Loan Fund program supports Goal 6 and Objective 6.1 by remediating contaminated properties and returning them to productive use, while involving people in decisions that affect their environment or health, especially communities with environmental justice concerns.

Outputs:

- Outreach materials: Recipient will provide program information and application materials online.
- Program announcements will be made through Council member newsletters, social media, and earned media.
- Recipient will maintain a pipeline of priority clean-up sites and prospective applicants.
- Relevant staff will participate in Brownfields management and financing training.
- Recipient will enter into at least 2 discount loan or subgrant agreements for brownfield remediation with non-profit organizations.
- Recipient will enter into at least 1 loan agreement for brownfield remediation with a for profit business.
- Recipient will collect and maintain property oversight reports following completion of clean up.

Outcomes:

- A minimum of three (3) brownfield properties will be cleaned up, leveraging additional private investment and job creation.

b. Project Goals

Certain properties within Louisville Metro's urban service district area have been in economic and physical decline for the past 20 years, with the possibility of lingering contamination from former commercial or industrial operations. Remediating brownfield properties in this area will aid the area's redevelopment in accordance with several neighborhood and community plans, the city's comprehensive plan (Plan 2040) as well as the city's 2023 economic development strategy (Growing Louisville Together) and bring about a higher use that is more beneficial to the community.

The goals of the projects are to re-capitalize a revolving loan fund and make loans and subawards to eligible entities for cleanup of sites to facilitate the properties' redevelopment. These goals will be accomplished by site-specific and non-site-specific activities. Non-site-specific tasks include preparing outreach materials relevant to the RLF program, marketing the program to prospective borrowers and sub-awardees, and providing access to brownfields-specific training and continuing education for staff. Site-specific tasks include verifying site and borrower/subaward recipient eligibility, preparing loan documents, preparing Quality Assurance Project Plans (QAPP), conducting site-specific public relations activities, preparing Analyses of Brownfields Cleanup Alternatives (ABCA), and consulting with, and enrolling sites in, the State Voluntary Cleanup Program (VCP). This will be overseen by a specific brownfields project manager employed by Louisville Metro Government.

Cooperative agreement funding will be used to cover the costs of activities at, or in direct support of, brownfields sites as defined under CERCLA 101(39). The overall coordination of the cooperative agreement will be overseen by the Director of the Office of Planning. Use of all grant funds for site-specific activities will require approval by the Metropolitan Business

Development Corporation (METCO) Board. The Metropolitan Business Development Corporation (METCO) is an independent, non-profit entity that manages an \$18 million revolving loan fund portfolio for small business and commercial property improvement use. METCO approves over \$2 million in new loans annually. Louisville Jefferson County Metro Government serves as the fiscal agent of METCO. The use of all METCO lending capital requires approval by the METCO Board. The Director of the Department of Economic Development serves as President and Chair of METCO with six additional board members appointed by the mayor. METCO is administered by staff of the Department of Economic Development.

The METCO Board is responsible for approving all loans and subawards under this grant, as well as authorizing use of program income. Use of program income will be prioritized for assessment and remediation of sites controlled by Louisville Jefferson County Metro Government. The METCO Board and will follow METCO RLF policies and procedures. Program activities will be carried out through a collaboration between the METCO RLF Manager and the Brownfields Project Manager, assisted by the Office of Management and Budget and the Jefferson County Attorney's Office, with technical assistance and oversight to be performed by a Qualified Environmental Professional and the state VCP.

1.4 Project Team Structure & Responsibilities

The Louisville Metro Brownfield Revolving Loan Program (RLF) is coordinated through a collaboration between Metro's Revolving Loan Fund known as METCO, which is administered by the Department of Economic Development, and the Brownfields Management activities which are administered by the Office of Planning. The Office of Economic Development and the Office of Planning are both housed within Louisville Metro's Cabinet of Economic Development.

The Director of the Office of Planning (formerly the Director of Advanced Planning), Michael King, is responsible for:

- Oversight of inter-departmental program coordination;
- Timely implementation of program activities; and
- Successful completion of the cooperative agreement.

Michael has been with Metro Government for 17 years and has a multi-disciplinary skillset that allows for creative strategies to be utilized in the city's brownfields program.

Sara Ellis, the Brownfields Program Manager, is supervised by the Director of the Office of Planning and is responsible for:

- Program marketing;
- Maintaining a pipeline of priority projects, prospective borrowers, and prospective sub-awardees;
- Determining site eligibility;
- Monitoring status of funded clean-up activities; and
- Verifying completion of funded clean-up activities.

The Brownfields Program Manager is solely focused on working with property owners and developers on remediation opportunities. Sara has over 10 years of experience in project management and community, and six years in land use planning.

The METCO RLF Manager, Brenda Hyatt, is supervised by the Director of the Department of Economic Development and is responsible for:

- Maintaining inter-departmental records and communication regarding availability and use/commitment of grant funds and program income;
- Underwriting eligible loan applications;
- Presenting loan applications and sub-award requests for decisioning by the METCO Board;
- Closing approved loans;
- Servicing active loans; and
- Coordinating and submitting all program and financial reporting as required by the EPA.

Brenda Hyatt joined the METCO RLF staff in 2017 as the METCO Manager. Ms. Hyatt holds a B.A. in Economics and Business Administration from Western Kentucky University and previously served as the Vice President of Eclipse Bank from 2006 until 2016.

1.5 Pre-Award Costs (if applicable)

No pre-award costs are required.

Section 2.0. - Project Tasks

Task 1 - Project Oversight & Fund Management

- a. Task Description:** Manage inter-departmental coordination for timely program implementation and effective use of funds. Task activities include:
- Quarterly review and reporting of program implementation, including effectiveness of inter-departmental coordination;
 - Project pipeline development;
 - Verifying completion of funded clean-up activities;
 - Maintaining inter-departmental records and communication regarding availability and use/commitment of grant funds and program income;
 - Coordinating and submitting all program and financial reporting as required by the EPA.

b. Task Lead: Louisville Jefferson County Metro Government

c. Schedule

Task Start Date: 10/1/2023

Task Completion Date: 9/30/2028

d. Outputs/Deliverables

- Marketing materials
- Application Form
- Loan and discount loan agreements
- Subgrantee agreements Quarterly reports on program implementation, financial and site-specific cleanups

Task 2 – Travel & Training

a. Task Description: Increase staff knowledge of how to successfully manage and finance brownfield cleanups.

- Attend brownfields related meetings, training sessions and conferences

b. Task Lead: Louisville Jefferson County Metro Government

c. Schedule

Task Start Date: 10/1/2023

Task Completion Date: 9/30/2028

d. Outputs/Deliverables

- Attend meetings, conferences, training sessions
- Increase knowledge of brownfields issues and programs

Task 3 – Community Involvement & Outreach

a. Task Description: Prepare publicly available program information for dissemination to prospective borrowers, subgrantees, and community. Tasks include:

- Develop informational program materials for use on websites, social media, flyers, and brochures to communicate availability of program to stakeholders
- Targeted outreach to MWBE listservs and organizations to build awareness of program opportunities

b. Task Lead: Louisville Jefferson County Metro Government

c. Schedule

Task Start Date: 10/1/2023

Task Completion Date: 9/30/2028

d. Outputs/Deliverables

- Program outreach and marketing materials
- Community engagement strategy

Task 4 – Loans & Grants

a. Task Description. Capitalize loans, discount loans and subgrants for eligible brownfield clean-up. Tasks include:

- Determining site-specific eligibility of prospective borrowers and subgrantees;
- Revising existing loan, discount loan and subgrantee documents to ensure inclusion of all applicable federal environmental and cross-cutting requirements, such as Prevailing Wage/Davis-Bacon and the National Historic Preservation Act;
- Underwriting eligible loan applications;
- Presenting loan applications and subgrantee requests for decisioning by the METCO Board;
- Approving all loans, discount loans, subgrants, and use of program income;
- Closing approved loans and executing subgrants;
- Managing all loans and grants, including servicing active loans and financial record keeping;
- Monitoring status of clean-up activities and use of loan/subgrant funds;
- Prepare ABCA as needed for public comment;
- Ensure compliance with the Davis-Bacon and the National Historic Preservation Act;
- If funded by EPA, prepare a Sampling and Analysis Plan for post-cleanup sampling, and submit to EPA for approval.

b. Task Lead: Louisville Jefferson County Metro Government

c. Schedule

Task Start Date: 10/1/2023

Task Completion Date: 9/30/2028

d. Outputs/Deliverables

- Documentation of site eligibility approval
- Final loan, discount loan, and subgrant documents
- Documentation of borrower/subgrant recipient enrollment in a voluntary cleanup program (if applicable)
- Documentation of compliance with the National Historic Preservation Act (if applicable)
- Approved Sampling and Analysis Plans (if applicable)

Task 5 – Cleanup Oversight

a. Task Description. Oversee successful completion of funded clean ups. Tasks include:

- QEP conducts site inspections during remediation to ensure compliance with cleanup plans;
- Ensure compliance with Davis Bacon, such as site inspections to ensure proper wage rates and posters are available to workers on-site; collect, review and maintain payrolls and conduct on-site labor interviews;
- Prepare and submit close-out documentation indicating that cleanup is complete and protective to human health and the environment and identifies any institutional controls and long-term monitoring;
- Receive final cleanup complete letter from certified response program.

b. Task Lead: Louisville Jefferson County Metro Government and professional consultants

c. Schedule

Task Start Date: 10/1/2023

Task Completion Date: 9/30/2028

d. Outputs/Deliverables

- Site reports from qualified environmental professional
- Documentation of Davis-Bacon compliance
- Final cleanup reports documenting cleanup is complete
- No Further Action (NFA) Letter from certified response program (if applicable)

Task 6 – Project Reporting & Closeout

a. Task Description: Provide regular reports to EPA including Quarterly Progress Reports, annual Minority Business Enterprise/Women-Owned Business Enterprise (MBE/WBE) Reports, and annual and final Federal Financial Reports. In addition, the recipient will sign and return the RLF Closeout Agreement (COA) to their EPA Project Officer no later than 30 days after award of the cooperative agreement.

Quarterly Reports will include the following elements, which are included in the Quarterly Report template provided by your Project Officer:

1. *Summary of Successes/Challenges over the past quarter.*
2. *Assistance Needed from EPA.*
3. *Narrative Update by Task that follows the format of the approved workplan.*
4. *Progress made by organizations receiving subawards under this grant.*
5. *Cumulative Expenditures to Date, including a cumulative budget table of expenditures to date by project task and budget category. The quarterly budget summaries will include information on recipient's cost share (if applicable) and program income balance.*
6. *Spreadsheet of Site Remediated that received loans and/or subgrants.*

ACRES Reporting. The recipient will be responsible for inputting site assessment and program income balance data into the EPA [Assessment, Cleanup & Redevelopment Exchange System \(ACRES\)](#) database. This database will be updated quarterly.

Final Progress Report. Louisville Metro Government will provide a final summary progress report describing the initial goals and objectives of the brownfields grant, accomplishment of the goals and objectives, and any changes implemented. The report will highlight lessons learned and clearly describe future tasks which will be necessary for redevelopment of the site(s). The report will describe resources leveraged during the project (other than the EPA grant), how they were used, and any resources leveraged to continue the project after the expiration of the brownfields grant. The report will include any supporting assessment documents or summaries not previously provided.

Final Report Outline

1. Overall Project Goals: Provide a summary of the project's overall revolving loan program
2. Successes: In one to two paragraphs, provide a narrative summary description of the project successes. Provide information on sites that were remediated and moved to redevelopment. For site specific successes, provide information on the former use of the site, number of acres, future reuse of the site, and why the site is a priority or catalyst site. Include site photos or schematic images of future reuse plans.
3. Lessons Learned/Best Practices: Identify lessons learned and best practices/materials transferable to other communities; opportunities for sharing information, including how the recipient, EPA, and others can share that information across multiple media types (meetings, conferences, changes to local policy, social media, etc.)
4. Partnering/Leveraging: Identify significant partnering with other organizations and/or leveraging of resources, as well as any resources leveraged to continue the project after the RLF loan or subgrant funds are expended.
5. Workplan Accomplishments: Provide a summary of accomplishments for each of the grant Workplan tasks and/or any tasks that were not completed and why.
6. EPA Acknowledgement: Include information on how EPA has been acknowledged as a funding partner in the project.
7. ACRES/Community Wide Assessment Spreadsheet: Ensure all the site and program income balance entries are up to date in ACRES.
8. Budget: Provide a budget table that compares total budgeted amounts and total

amounts spent; identify whether any funds will be returned to EPA or the amount of program income which will be kept in a separate post-closeout program income bank account and governed under the Terms and Conditions of the recipient's latest signed COA.

Photos – Email high-resolution photos of sites remediated and/or redeveloped, as appropriate.

RLF COA: A COA will be accepted by the recipient as a component of the cooperative agreement's Terms and Conditions. The COA dictates how post-closeout program income will be used for the continued operation of an RLF for brownfields cleanup, and/or other brownfields activities, as well as post-closeout progress reporting and ACRES reporting requirements. This COA is based on the FY22 RLF COA template. EPA plans to modify RLF COA templates every five years. EPA reserves the right to renegotiate the terms of this RLF COA every five years, in conjunction with the template change (e.g., next change will be in FY27). If the recipient agrees to continue to operate the RLF under a COA past FY27, the recipient shall work with EPA's Project Officer to update to the latest COA template.

Cooperative Agreement Administrative Reporting & Closeout - The recipient will need to comply with annual administrative reporting and closeout requirements in the Terms and Conditions of the Cooperative Agreement, including the forms as outlined on the [EPA Grants](#) website and in the Terms and Conditions of the grant. For more on closeouts, refer to the [EPA Grants Frequent Questions about Closeouts](#) webpage.

b. Task Lead: Louisville Jefferson County Metro Government

c. Schedule

Task Start Date: 10/1/2023

Task Completion Date: 9/30/2028

d. Outputs/Deliverables: Project deliverables due to the Project Officer include:

- Quarterly progress reports
- Quarterly ACRES database updates
- Final Progress Report
- Field reports, if applicable
- Annual Federal Financial Report, SF-425
- Annual Disadvantaged Business Reports (DBE or MBE-WBE)
- RLF Closeout Agreement, signed and returned no later than 30 days after award

Administrative deliverables include:

- Annual Federal Financial Reports (FFR, SF-425)
- Final Federal Financial Report
- Disadvantaged Business Enterprise Utilization Reports – Due October 31st, annually

Section 3.0. - Schedule of Milestones & Deliverables

DUE DATE	Project Milestones & Programmatic & Administrative Deliverables	Send to:			
		EPA Project Manager	STATE	EPA Region 4 GRANTS	EPA Research Triangle Park (RTP) FINANCE
Month 1	RLF Closeout Agreement Signed (within 30 days of cooperative agreement award)	X			
Month 1	Select Recipient Project Manager	X			
Month 8	Qualified Environmental Professional Selected	X			
Month 72	Project Website Created/Program Fact Sheet - project starting	X			
Month 8	Community Involvement Plan	X			
Month 8	Marketing Plan	X			
Month 4	Quarterly Progress Report (QPR) 1 & Deliverables	X			
Month 7	Quarterly Progress Report (QPR) 2 & Deliverables - continue with as many quarters as needed	X			
As Needed	Requests for Reimbursement – see Administrative Terms and Conditions				X
	Federal Financial Reports (FFR) (SF425) must be submitted annually within 90 days of the reporting period. Final FFRs are due within 120 days after the end date of the grant. For forms & more information, visit: https://www.epa.gov/grants/epa-grantee-forms	X (copy)			X
	DBE Report (also known as “MBE/WBE”) (DBE = Disadvantaged Business Enterprises) Reports must be submitted annually by October 30th of each year. For forms & more information, visit: https://www.epa.gov/resources-small-businesses	X (copy)		X	

Section 4.0. - Budget Summary and Budget Table

Brownfield Revolving Loan Program Louisville Metro								
Budget Summary								
Budget Categories		Task 1	Task 2	Task 3	Task 4	Task 5	Task 6	Total
		Project Oversight & Fund Management	Travel & Training	Community Involvement	Loans & Subgrants	Cleanup Oversight	Project Reporting & Closeout	
Direct Costs	Personnel							-
	Fringe							-
	Travel ¹		20,000					20,000
	Supplies							-
	Equipment ²							-
	Contractual					50,000		-
	Construction							-
	Other - Loans ³				450,000			450,000
	Other – Subgrants or discount loans				480,000			480,000
	Other - Direct Costs ⁴							-
Total Direct Costs		-	20,000	-	980,000	-	-	1,000,000
Indirect Costs ⁵								-
TOTAL EPA FUNDING			20,000		980,000			1,000,000
Recipient Cost Share								
Total Approved Project Costs		-	20,000	-	980,000	-	-	1,000,000

Attachment A: EPA Brownfield Program-Specific Budget Notes on Administrative and Programmatic Costs

- **Administrative costs** (direct and/or indirect) cannot exceed 5% of the total approved project costs (EPA funding plus cost share, if applicable). Per IV.E. Narrative/Ranking Criteria of the FY2022 Guidelines for Brownfield Revolving Loan Fund Grants, 3. Task Descriptions, Cost Estimates, and Measuring Progress: Cooperative agreements with successful applicants under this solicitation will be subject to the administrative cost limitation described at CERCLA § 104(k)(5)(E). Successful applicants may only use up to 5% of the total approved project costs (EPA funded amount plus the recipient's cost share, if applicable) for their own administrative costs (direct costs for grant administration and indirect costs). For example, if EPA awards \$1,000,000 to an applicant, the applicant's cost share is \$200,000 (20%) and the total award amount is \$1,200,000. Therefore, the 5% cap for administrative costs is based on the \$1,200,000 total award amount and equals \$60,000. The limitation on administrative costs does not apply to otherwise allowable programmatic costs (including indirect costs) charged by procurement contractors. Note that EPA considers costs for performance and financial reporting to be allowable programmatic costs that are not subject to the 5% limitation. Costs must be classified as direct or indirect consistently and applicants may not classify the same cost in both categories.

➤ **Distinctions between administrative and programmatic costs are listed below.**

- Administrative Costs: Costs including salaries, benefits, supplies, etc. for activities that are not directly related to the work conducted under the cooperative agreement.

Please note: For clarity and ease of tracking, we recommend that administrative costs are reflected under the Indirect Cost Budget Category.

- Programmatic Costs: Costs for activities (including the portion of salaries and fringe) that are integral to achieving the purpose of the grant. These include:
 - Cleanup of sites
 - Reports and Deliverables (e.g., Quarterly Reports and Financial Status Reports)
 - Community outreach activities
 - Travel, training, reference materials and contract support

Please note: Programmatic costs should be reflected under one of the Direct Cost Budget Categories.

For more information, please refer to the sample FY2021 RLF Terms and Conditions and the FY2022 Frequently Asked Questions for EPA Brownfields Multipurpose, Assessment, RLF, and Cleanup (MARC) Grants, Section O. Administrative Costs -

https://www.epa.gov/system/files/documents/2021-10/fy22-faqs_10-28-21_0.pdf

Attachment B: EPA Budget Development, Procurement, & Related Guidance

EPA Grants

<https://www.epa.gov/grants>

EPA Grant Forms

<https://www.epa.gov/grants/epa-grantee-forms>

Budget Development Guidance – For information on best practices for preparing budgets for applications for EPA grants, refer to the [Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance](#).

Procurement Guidance – For guidance on complying with competitive procurement requirements, refer to the [Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements](#) (https://www.epa.gov/system/files/documents/2021-10/fy22-fags_10-28-21_0.pdf).

EPA Grant General Terms & Conditions – https://www.epa.gov/system/files/documents/2021-09/fy_2022_epa_general_terms_and_conditions_effective_october_1_2021.pdf

EPA SubAward Policy – <https://www.epa.gov/grants/grants-policy-issuance-gpi-16-01-epa-subaward-policy-epa-assistance-agreement-recipients>

EPA Region 4 Grants Management Guidance on Requirements for Workplan Detailed Budget Narrative:

- A Detailed Budget Narrative is a required part of your complete application package. It goes hand-in-hand with your Workplan, which should discuss the need for each budgeted item.
- It will also provide the essential budget information needed for the Budget Information, Standard Form 424A, which is part of your application.
- Without a Detailed Budget Narrative, EPA will not be able to adequately review your grant application and your application will be delayed.

How Much Detail is Enough?

Please include information that shows how you arrived at your estimated costs, i.e., what is the basis for your calculations? At a minimum, your detailed budget narrative must follow these criteria, using these budget categories:

Personnel - List all staff positions for the project by title. Give annual salary or hourly rate, percentage of time or number of hours allotted to the project, and total cost for the project period. The total for this category will be entered on Standard Form 424A, Section B, Line 6.a.

Fringe Benefits - Identify the percentage used for your calculation, the basis for its computation, and what benefits are included. This amount will be entered on Standard Form 424A, Section B, Line 6.b.

Travel - Indicate the budgeted travel's purpose, the destination of each trip, the duration of the trip and the number of travelers. Specify the mileage, per diem, and other costs for each type of travel, such as lodging, common carrier transportation, etc. If each trip cannot be itemized out, describe how you arrived at your budgeted costs. For example: "Travel costs are based on last year's actual costs for the same work tasks. This year's travel effort is estimated to be the same." This amount will be entered on Standard Form 424A, Section B, Line 6.c.

Equipment - Identify each item to be purchased which has an estimated acquisition cost of \$5,000 or more per unit and a useful life of more than one year. Items with a unit cost of less than \$5,000 are deemed to be supplies, pursuant to 2 CFR 200.94. If applicable, indicate why it is more economical to purchase rather than lease. This amount will be entered on Standard Form 424A, Section B, Line 6.d.

Supplies - "Supplies" means all tangible personal property, other than "equipment". The detailed budget should identify categories of supplies to be procured (e.g., laboratory supplies or office supplies), and their cost. This amount will be entered on Standard Form 424A, Section B, Line 6.e.

Contractual - Identify each proposed contract and specify its purpose and estimated cost. Provide information on how the estimates were arrived at. This amount will be entered on Standard Form 424A, Section B, Line 6.f. If you plan to publish a Request for Proposals to acquire the services of an environmental contractor (also sometimes referred to as an "environmental consultant"), these costs will be shown here. Please be advised that the term "consultant*" has a different meaning under EPA procurement regulations – please see below.

Consultants - *If your project requires the hiring of consultants (individuals with specialized skills who are paid at an hourly or daily rate), the maximum allowable consultant rate cannot exceed the maximum daily rate for a Level IV of the Federal Executive Schedule, adjusted annually.*

You may find the annual salary for Level IV of the Executive Schedule on the [Office of Personnel Management website](https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/EX.pdf), under Executive & Senior Level Employee Pay Tables, "Rates of Pay for the Executive Schedule," and then by selecting "Rates of Pay for the Executive Schedule" by preferred File Type from the Pay Table (<https://www.opm.gov/policy-data-oversight/pay-leave/salaries-wages/salary-tables/pdf/2022/EX.pdf>).

The annual salary is divided by 2087 hours to determine the maximum hourly rate, which is then multiplied by 8 to determine the maximum daily rate. For example, a Level IV Executive Service annual salary of \$172,500 is equivalent to \$82.65 per hour (\$172,500/2087 hours) or \$661.24 per day (\$172,500/2087 hours x 8 hours/day). This

excludes overhead, travel, and subsistence costs for travel. Your detailed budget **MUST** show the hourly or daily rate you are proposing (for example: consultant 24 hours X \$60.00 per hour = \$1440).

Other – This category should include only those types of direct costs that do not fit in any of the other budget categories. Examples of costs that may be in this category include registration fees, state oversight costs insurance and indemnification, rental/lease of equipment or supplies, equipment service or maintenance contracts, printing, or photocopying, and subaward costs. List each item separately and provide sufficient detail for EPA to determine the reasonableness and allowability of its cost. *This amount will be entered on Standard Form 424A, Section B, Line 6.h.*

Subawards - Subawards (e.g., loans and subgrants) are a distinct type of cost under the “Other” category. The term “subaward” means an award of financial assistance (money or property) by any legal agreement made by the recipient to an eligible subrecipient. This term does not include procurement purchases, technical assistance in the form of services instead of money, or other assistance in the form of revenue sharing, loans, loan guarantees, interest subsidies, insurance, or direct appropriations. Subcontracts are not subawards and belong in the contractual category. Applicants must provide the aggregate amount they propose to issue as subaward work and a description of the types of activities to be supported. EPA Project Managers and Grants Specialists will review the [EPA Subaward Policy under Grants Policy Issuance \(GPI\) 16-01](#). This policy establishes the requirements and procedures for Grants Management Offices and Program Offices in making determinations regarding subrecipient eligibility, overseeing pass-through entity monitoring and management of subawards, and authorizing fixed amount subawards under [2 CFR 200.330](#), [200.331](#), and [200.332](#) (“the applicable regulations”).