

**BROWNFIELDS CLEANUP REVOLVING LOAN FUND
LOAN PROCESS OUTLINE
NON-TIME CRITICAL REMOVAL ACTION**

TASK	Lead Agency	Borrower	Site Manager	EPA
Pre-Loan Activities				
Certifies that Borrower is not a PRP	✓			
Determines that site & borrower are eligible for EPA funding	✓			✓
Enrolls site in the appropriate State response program		✓		
Designates a Site Manager to prepare and review cleanup plans and actions <ul style="list-style-type: none"> • Must be an independent third-party and cannot be the borrower's environmental contractor • May be an environmental contractor or the State 	✓			
State Approval to Act as Lead Agency				
Prepares letter to State notifying them that they will oversee a NTCRA	✓			
Responds with letter stating they are aware and approve			✓	
Community Relations Requirements				
Designates a Community Relations Spokesperson <ul style="list-style-type: none"> • Informs Community of actions taken • Responds to inquiries • Provides information on removal activities 	✓			
Establishes Information Repository & Administrative Record <ul style="list-style-type: none"> • Inform public of the location of documents • Near site – i.e. Town Hall or public library • Must be established before EE/CA is available for public review 	✓			
Conduct Community Interviews <ul style="list-style-type: none"> • Local officials, residents, public interest groups and other interested parties 	✓			
Community Relations Plan <ul style="list-style-type: none"> • Outline activities Lead Agency will undertake during removal action • Must be completed before EE/CA is complete 	✓			
<ul style="list-style-type: none"> • Reviews and comments on Community Relations Plan 			✓	✓
Loan Documents				
Develops draft loan agreement and submits to EPA for review	✓	✓		
Reviews loan agreement for inclusion of NTCRA and other cross-cutting requirements (such as Davis Bacon)				✓
Engineering Evaluation/Cost Analysis (EE/CA) Approval Memo				
Prepares memo that documents site meets NCP criteria for a removal action and that it is non-time critical <ul style="list-style-type: none"> • Includes detailed information on site background, threats to public health and estimated costs • Must be completed prior to making a loan 			✓	
Reviews and approves Approval Memo	✓			

TASK	Lead Agency	Borrower	Site Manager	EPA
Engineering Evaluation/Cost Analysis (EE/CA)				
Prepares document that identifies objective of the removal action <ul style="list-style-type: none"> Provides analysis of cleanup alternatives <ul style="list-style-type: none"> ✓ Implementability ✓ Effectiveness ✓ Cost Identifies recommended alternative Similar to Feasibility Study or Phase III 		✓		
Reviews EE/CA			✓	✓
Approves EE/CA	✓			
Public Comment Period				
Publishes a Public Notice of availability of draft EE/CA and conducts a 30-day public comment period	✓			
Prepares a written response to significant comments			✓	
Action Memo				
Drafts Action Memo <ul style="list-style-type: none"> Substantiates need for a removal action Identifies the proposed action Explains rationale for selection Contains response to public comments received during EE/CA comment period 			✓	
Signs Action Memo	✓			
Prepares design & construction plans (RAP)		✓		
Reviews & comments on design and construction plans (RAP)			✓	
Quality Assurance Project Plan (QAPP) Requirements				
Prepares quality assurance project plan if environmental sampling is to be conducted and submits to EPA for approval		✓		
Reviews and approves quality assurance project plan				✓
Cleanup Activities				
Conducts periodic site visits during implementation <ul style="list-style-type: none"> Ensures compliance with approved plans 			✓	
Prepares cleanup closeout documentation at the completion of the cleanup and submits to State or Site Manager for review <ul style="list-style-type: none"> Documents that cleanup is complete and is protective of human health & the environment Identifies institutional controls used and long-term monitoring requirements 		✓		
Reviews and comments on cleanup closeout documentation			✓	
Submits copy of State approval letter or completed site closeout documentation	✓			