

**Attachment A – Southern Windsor County Brownfields Revolving Loan Fund
Eligible Project Costs**

1. Eligible Costs – Eligible project costs, as designated by the U.S. EPA’s Administrator, are for cleanup only and must be associated with removal activities. Eligible project costs include the following:

- Costs associated with removing, mitigating, or preventing the release or threat of release of hazardous substance, pollutants or contaminant, including:
 - Fences, warning signs, or other security or site control precautions;
 - Drainage control;
 - Stabilization of berms, dikes, or impoundments or drainage or closing lagoons;
 - Capping of contaminated materials;
 - Using chemicals and other materials to retard the spread of the release or mitigate its effects;
 - Excavation, consolidation or removal of highly contaminated soils from drainage or other areas;
 - Removal of drums, barrels, tanks or other bulk containers that contain or may contain hazardous substances, pollutants or contaminants;
 - Containment, treatment, disposal or incineration of hazardous materials; and
 - Provision of alternative water supply where necessary immediately to reduce exposure to contaminated household water and continuing until such time as local authorities can satisfy the need for permanent remedy.
- Site monitoring costs, including sampling and analysis that are reasonable and necessary during the cleanup process, including determination of the effectiveness of a cleanup.
- Costs associated with meeting the public participation, worker health and safety and interagency coordination requirements.
- Costs associated with removal activities, including demolition and/or site preparation that are part of site cleanup.
- Environmental Insurance Premiums.

3. Restrictions

The SWCBRLF cleanup loan or subgrant may not be used for:

- Pre-cleanup environmental response activities (i.e. planning, inventory, site assessment, identification, or characterization). However, the Lead Agency may request EPA approval for limited site assessment on a case-by-case basis when necessary to ensure protection of the environment and public health through cleanup actions.
- Monitoring or data collection necessary to apply for, or comply with environmental permits under other state and federal laws unless such a permit is required as a component of the cleanup action;

- Development activities that are not removal actions (e.g. construction of a new facility or marketing of property);
- Job training unrelated to performing a specific cleanup at a site covered by a loan or subgrant;
- To pay for a penalty or fine;
- To pay a federal cost share requirement (for example, a cost-share required by another Federal grant) unless there is specific statutory authority;
- To pay for response costs at a brownfields site for which the recipient of the subgrant or loan is potentially liable under CERCLA Section 107;
- To pay a cost of compliance with any federal law, excluding the cost of compliance with laws applicable for cleanup;
- Unallowable costs (e.g. lobbying and fund raising) under applicable OMB Circulars.

4. Administrative cost prohibition

Borrowers are prohibited from using loans financed with EPA funds for administrative costs. These include the following:

- a. Salaries, benefits, contractual costs, supplies, and data processing charges incurred for loan administration and overhead costs;
- b. Direct costs for loan administration, even if the borrower is required to carry out the activity under the loan agreement. Ineligible loan administrative costs include expenses for:
 - Preparation of applications for loans and loan agreements
 - Preparing revisions and changes in the budget, work plans, and other documents required under the loan agreement;
 - Maintaining and operating financial management and personnel systems;
 - Preparing payment requests and handling payments; and
 - Audits.