



Brownfield Remediation Grant Program

Fiscal Year (FY) 2024-2025 Second Award Period

Frequently Asked Questions (FAQs)

Project/Applicant Eligibility

1. Q: Who should submit the projects into the application portal?

A: Previously designated Lead Entities must submit the application. The list of approved Lead Entities can be found on [Development's Brownfield Remediation Program Webpage](#).

2. Q: Would a property with a prior remediation grant be eligible for remediation on a separate part of the property, or parcel unrelated to the prior grant or as part of a different regulatory program?

A: Previously awarded projects are not eligible to receive funding in this application period. Development would require additional information in order to appropriately determine the eligibility of this property.

Match Funds

3. Q: Do assessment applications require 25% match?

A: Yes, all applications for FY25 Brownfield Remediation Program funding must provide 25% match.

4. Q: What are acceptable forms of match?

A: Match can be for allowable costs incurred within the lookback window (on or after July 1, 2022). See Program Guidelines for other examples of eligible match documentation.

5. Q: Would costs to secure the property be eligible for match?

A: Temporary property security measures are eligible costs.

Application Requirements

6. Q: What documentation is required to apply for asbestos abatement?

A: An Asbestos Survey is required to prove and document the presence of asbestos in a building.

7. Q: Do all projects with underground storage tanks (BUSTR) need to be categorized as assessment grants?

A: If the site has a BUSTR approved RAP, then it may be appropriate to apply under the cleanup grant type. Projects that have begun assessment but have not yet had their RAP approved by BUSTR should apply under the assessment grant type.

Project Deliverable Requirements

8. Q: When should a grantee provide identified project deliverables for cleanup/remediation?

A: If a project is awarded a grant, certain project deliverables are required before closeout. Documentation of these deliverables depends on the type of award and project scope. Development may request additional documentation as is reasonable and necessary to demonstrate project completion. Previously cleanup/remediation projects are not eligible for this round of funding.

Grant Terms and Conditions

9. Q: With the lower \$2.5 million grant limit, is it still expected that projects that are awarded get fully remediated as a result of the grant project?

A: The expectation of the program is to have a fully remediated site.

10. Q: Why is the grant agreement start date July 1, 2024 and not July 1, 2025?

A: Ohio's Fiscal Year (FY) runs from July 1 through June 30. Since this second award period falls within FY25 (July 1, 2024 – June 30, 2025), the grant agreement start date will align with the start date of this current FY. Eligible costs for approved projects that are incurred after that date will be eligible for reimbursement.

11. Q: When does the application portal open?

A: The application portal will open at 10:00 am on Wednesday, February 19, 2025.

12. Q: Could a previous assessment grant recipient apply for a remediation grant even though the site will still be in the middle of assessment at time of application?

A: To be eligible to apply for cleanup funds, assessments must be complete.



Previous Applicable FAQs

The following questions were included in the 2024 FAQs.

Project/Applicant Eligibility

1. **Q: Would a property that will be redeveloped into residential use, but the contamination occurred because of its past industrial/commercial use, qualify under the Brownfield Remediation Program (Brownfield Program)?**

A: Yes, it would be considered an eligible property; cleanup would have to meet residential standards.

2. **Q: If we applied for the Demolition and Site Revitalization Program not knowing that remediation was necessary, may we apply for Brownfield Program funding for the same property?**

A: Brownfields are not eligible for the Demolition and Site Revitalization Program. If Development determines a project is ineligible for the Demolition Program, the applicant must withdraw the project, and submit a new application for the Brownfield Program.

3. **Q: Can these funds be spent on asbestos abatement of a school building and demolition of the building?**

A: Yes, asbestos abatement and building demolition are eligible expenses. A school building is considered an eligible institutional building.

4. **Q: Is federal property eligible for this funding when partnering with private and/or non-profit partners?**

A: The Lead Entity would need to agree to submit the project. The Lead Entity would need to receive an access agreement with the federal property owner, and the private and/or non-profit partner could participate as a redevelopment partner.

5. **Q: Are remediation projects involving polychlorinated biphenyls (PCBs) eligible for funding?**

A: Yes, PCBs are considered a hazardous substance.

6. **Q: For asbestos projects that involve demolition, is going through the Voluntary Action Program (VAP) a requirement?**

A: The VAP is not required for asbestos-only projects that involve demolition.

7. Q: If a private party owns property and is seeking funding, does the private party need to transfer title to the property to the Lead Entity to be eligible?

A: No, except per Page 2 of the program guidelines: “If the entity that caused or contributed to the contamination is the property owner, a purchase agreement transferring the property to the applicant or non-liable third party must be included in the application.” Regardless, the private party would need to get their county’s Lead Entity to agree to submit this application to Development.

8. Q: Can work be done on government-owned buildings?

A: Yes, government buildings are considered eligible institutional buildings.

9. Q: Is abatement of known asbestos an eligible use of funds at a site where a Phase I has not been completed?

A: A Phase I is required to demonstrate there is no other contamination at the site.

10. Q: Can an application be submitted for assessment, then later for cleanup in the same round on the same site?

A: Applications must be submitted for either assessment or cleanup/remediation. Funds are limited and awarded based on the provisions in Ohio Revised Code (ORC) section 122.6511.

11. Q: Does a formal VAP Phase II report have to be done if Phase I is done and testing/sampling has already been completed?

A: If you are planning to apply for cleanup funds, it would depend on the scope of the project and what was discovered during the Phase I. If the Phase I recommends a Phase II, then the Phase II would also need to be completed prior to applying for remediation funds.

12. Q: Must a Phase II assessment be completed in advance of applying for a Cleanup/Remediation grant, or can an assessment in support of a VAP No Further Action (NFA) Letter/ Covenant Not to Sue (CNS) be included as a component of the Cleanup/Remediation grant?

A: Confirmation sampling can be included in a cleanup/remediation grant application, but generally, the site needs to be fully assessed.

13. Q: If contamination of a property is highly likely, can a Lead Entity ask for funding for Phase I and Phase II in the same request?

A: Yes, a VAP Phase I and a Phase I can be applied for in the same request under the assessment application.

14. Q: Where the intended reuse is as a public tourism amenity, are brownfield remediation projects, in support of economic redevelopment, eligible for funding?

A: Eligibility does not depend on the anticipated end use but whether the property meets the definition of a brownfield and is an eligible property type.

15. Q: Can the Brownfield funding be used on a previously funded BUSTR petroleum site to complete the property clean up?

A: Generally, yes, if the site has been fully assessed.

16. Q: Can an Abandoned Gas Station (AGS) site apply for the Brownfield Program?

A: Yes. The application for the AGS program has closed. All projects that qualify for the AGS program are eligible to apply for Brownfield Program funds.

Eligible Costs/Reimbursement

17. Q: Are Infrastructure costs capped at 20% of the total requested amount per project?

A: Infrastructure costs above 20% of a project's total request amount will be reviewed by program staff on a case-by-case basis. Lead Entities will need to provide a detailed justification for the request.

18. Q: Would the replacement of the roof verified to have asbestos-containing material (ACM) be considered an eligible Infrastructure cost?

A: If ACM is verified to be present throughout the roof, the removal of the roof is an eligible demolition expense.

19. Q: What about piping inside a building that is lead and ACM-wrapped considered an eligible Infrastructure cost?

A: Yes, water piping replacement would be considered an eligible infrastructure cost under water utilities.

20. Q: Is storm water remediation considered an eligible infrastructure cost?

A: Yes, storm water would be considered an eligible cost under water infrastructure.

21. Q: For asbestos-only remediation projects, is interior demolition an eligible cost (not only full-building demolition), for existing buildings with redevelopment planned within the structure?

A: Interior remediation and interior demolition would be an eligible cost under the Brownfield Remediation Program.

22. Q: Would underground mine mitigation be eligible under this program?

A: Yes, it is considered eligible.

23. Q: Are costs for removal of surface material, for example concrete or asphalt, eligible if its presence inhibits redevelopment?

A: If it inhibits remediation of the site, yes, it is an eligible cost. If it solely inhibits redevelopment, it is an ineligible cost.

24. Q: Is there a citation or reference related to "uniform cost guidance"?

A: The uniform cost guidance refers to the Grant Reimbursement Manual, which lists verified and signed timesheets. Administrative costs reimbursed with grant funds must list the hourly pay rates, the number of hours billed, the name of the employee, the dates the costs were incurred, and the type of work completed.

25. Q: Is the removal of a building foundation as a stand-alone project an eligible cost?

A: Demolition/removal as part of a remediation at a brownfield is an eligible cost. Removal of a building's foundation as the sole activity would not be expected to remediate a brownfield, nor would it be expected to comply with or achieve an applicable remediation program standard.

26. Q: We are looking at demolition of two schools where the asbestos abatement exceeds the actual cost of demolition. Could we request Brownfield Program funding for these projects rather than the Demolition Program?

A: Asbestos abatement and demolition are eligible costs under the Brownfield Program.

27. Q: Can you submit for partial reimbursement in lieu of waiting for the project's total completion?

A: Reimbursement for costs incurred can be requested once per month. The project does not need to be completed to submit a request.

28. Q: Does "sewer," as an eligible infrastructure item, mean storm *and* sanitary sewer?

A: Yes, the sewer category includes storm and sanitary sewers an eligible infrastructure expense.

Match Funds

29. Q: Can you clarify future in-kind costs that can be considered as an eligible expense for match? For FY 2024, eligible expenses that were incurred on or after July 4, 2021 may be used as match. Do these future in-kind costs include costs expended outside of a 2022 or 2023 Brownfield Remediation Program grant award?

A: This would be things like administrative in-kind costs. These expected in-kind costs could be eligible to be considered match in your application. If the project was approved, these costs would need to be documented and confirmed to have been incurred and reported as match in your request for reimbursement. This is how Development ensures the commitment outlined in your application is fulfilled.

30. Q: Can an FY24 assessment grant count as match for an FY 2025 remediation grant application?

A: No, grant funding from previously awarded Brownfield or the Demolition program projects cannot count as match for the FY24 or FY25 solicitation.

31. Q: Are infrastructure improvement costs eligible as match funds where the infrastructure improvement is happening at a brownfield site?

A: Yes, these would count as match.

32. Q: Are funds committed for the anticipated end use of a project eligible to count toward match as a future in-kind contribution?

A: Yes, if they occur within the timeframe of the grant and are reported as such.

33. Q: Is environmental insurance considered an eligible match item?

A: Yes.

Application Requirements

34. Q: Is local government support resolution still required even though the lead applicants are land banks?

A: Yes, this is still required. Development will also accept a letter of support from the unit of local government in lieu of a resolution.

35. Q: Does a subrecipient agreement need to be in place at the time of application, or can that be entered into upon award to the Lead Entity?

A: A memorandum of Understanding (MOU) is acceptable to submit with the application; however, the subrecipient agreement must be in place prior to execution of grant agreement. Development will not execute the grant agreement until the subrecipient agreement is in place.

36. Q: What is an example of a deliverable if applying under the Resource Conservation and Recovery Act (RCRA) assessment?

A: Sample results or other reports received back from the labs you contracted with. Development will work with Ohio EPA to review reports.

VAP/CNS Requirements

37. Q: If a site is eligible for the VAP, is it a requirement that it pursue an NFA Letter? And does it have to pursue a CNS, or can the process stop at the NFA Letter?

A: Development prefers to see the CNS pursued. CNS fees are also eligible expense for reimbursement. If the applicant/property owner wants to expose themselves to potentially being sued and does not want to receive a CNS, that is at their discretion.

Lead Entity

38. Q: Can the lead entities designate another user to submit applications on their behalf on the OH|ID portal?

A: Lead Entities may amend their user list to add or remove access for individuals by sending an email to Redevelopment@development.ohio.gov. Users listed on the access form should use the FEIN number of the Lead Entity when they make a submission. Lead Entities should be cognizant of who they authorize to be on that list, as they are giving those listed the ability to submit an application. If an application is submitted by a person not listed on the Lead Entity's access list, that application will not be accepted.

39. Q: As a private developer/applicant, how do we contact the Lead Entity for the county?

A: A list of selected Lead Entities by county is posted on the Brownfield Remediation Program [webpage](#). Development encourages you to find them via the organization's website and reach out directly, but if you are having trouble finding contact information, please contact our email address and make a request.

40. Q: As a local government or private party, do I apply in conjunction with my Lead Entity, or do I apply separately to the State?

A: The Lead Entity applies. Local governments do not apply directly. The Lead Entity may authorize additional users to their access list and those users can apply. The Lead Entity sets the authorized list, so they can add or remove individuals as needed. Lead Entities should be careful who they list. All authorized users should coordinate with the Lead Entity to ensure that the priorities of the Lead Entity are reflected in its submissions.

Application Process

41. Q: Can you provide more info on what the "asbestos abatement" option is under Cleanup Standards? Is that administered by an agency (like a VAP) or just overseen by a third-party professional?

A: Documentation from a certified or licensed professional or demolition contractor clearly stating that all such material was properly handled and disposed of. A Development Compliance Form is available through that Demolition program that can be used and is found [here](#).

42. Q: If an application is submitted, but needs a cure, will it remain in the current spot in the queue or will it be moved to the end?

A: An application will not lose its place in the queue during the curing process, as long as the applicant is responsive to Development's requests within the 10-day timeframe stipulated in the program guidelines.

Grant Terms and Conditions

43. Q: Will Development grant extensions due to complicated remediation project timelines or unforeseen circumstances?

A: Extensions will be considered on a case-by-case basis.

44. Q: Does the grant work on a reimbursement basis or can all the funds be disbursed at the start of the project?

A: Reimbursements are approved as costs are incurred. Please note, the final 10% of the award is held until documentation that the match commitment (if applicable) has been fulfilled.
