

Application Information Sheet
FY26 EPA Brownfields Cleanup Grant — Single Site Cleanup
Autonomous Municipality of Ponce, Puerto Rico
EPA-I-OLEM-OBLR-25-07

(1) Applicant Identification

Applicant Name:

Autonomous Municipality of Ponce (Municipio Autónomo de Ponce)

Mailing Address:

PO Box 331709

Ponce, Puerto Rico 00733-1709

The Municipality of Ponce is the legal applicant and will be the grant recipient responsible for the administration, financial management, regulatory compliance, and implementation of all cleanup activities funded under this award.

(2) Website URL

<https://visitponce.com>

(3) Funding Requested

a. Grant Type:

Single Site Cleanup

b. Federal Funds Requested:

\$4,483,740

(4) Location

City: Ponce

County: Ponce Municipality

State/Territory: Puerto Rico (U.S. Territory)

(5) Property Information

Property Name:

Former Lizzie Graham School

Site Address:

Calle Villa #230

Ponce, Puerto Rico 00730

The property is a former public school facility located in an established urban residential neighborhood of the City of Ponce.

(A one-page site location map will be submitted as a separate attachment.)

(6) Contacts

a. Project Director

Name: Keyla Guelén

Title: External Resources Officer

Organization: Municipio Autónomo de Ponce

Mailing Address:

PO Box 331709

Ponce, PR 00733-1709

Phone: 939-579-7743/787-812-3006

Email: keyla.guelen@ponce.pr.gov

b. Chief Executive / Highest-Ranking Elected Official

Name: Hon. Marlese A. Sifre Rodríguez

Title: Mayor

Organization: Municipio Autónomo de Ponce

Mailing Address:

PO Box 331709

Ponce, PR 00733-1709

Phone: 787-284-4141

Email: marlese.sifre@ponce.pr.gov

(7) Population

The City of Ponce has an estimated population of approximately **137,000 residents** according to the most recent U.S. Census data.

(8) Other Factors

The applicant qualifies under the following Other Factors:

Narrative Page #	Other Factor
1	The applicant is a United States Territory (Puerto Rico).
2	The reuse of the proposed site will facilitate renewable energy from solar power.
2	The reuse of the proposed site will incorporate energy efficiency measures.

The proposed reuse concept includes the integration of on-site solar photovoltaic systems, rainwater harvesting cisterns, natural daylighting design, and energy-efficient and environmentally sustainable building systems and materials. These elements will be incorporated during the redevelopment phase following completion of environmental cleanup activities.

(9) Releasing Copies of Applications

The Municipality of Ponce acknowledges that copies of applications submitted under this funding opportunity may be made publicly available on EPA’s Office of Brownfields and Land Revitalization website or other public websites for approximately three months after selected applications are announced.

The Municipality certifies that:

- No confidential business information (CBI) or trade secrets are included in this application.
- No personally identifiable or private information is included.
- No salary data, personal emails, or protected personal information is disclosed.

CBI Statement:

Not applicable.

The Municipality understands that if no CBI is claimed at the time of submission, the application may be made publicly available by EPA in accordance with 40 CFR Part 2.

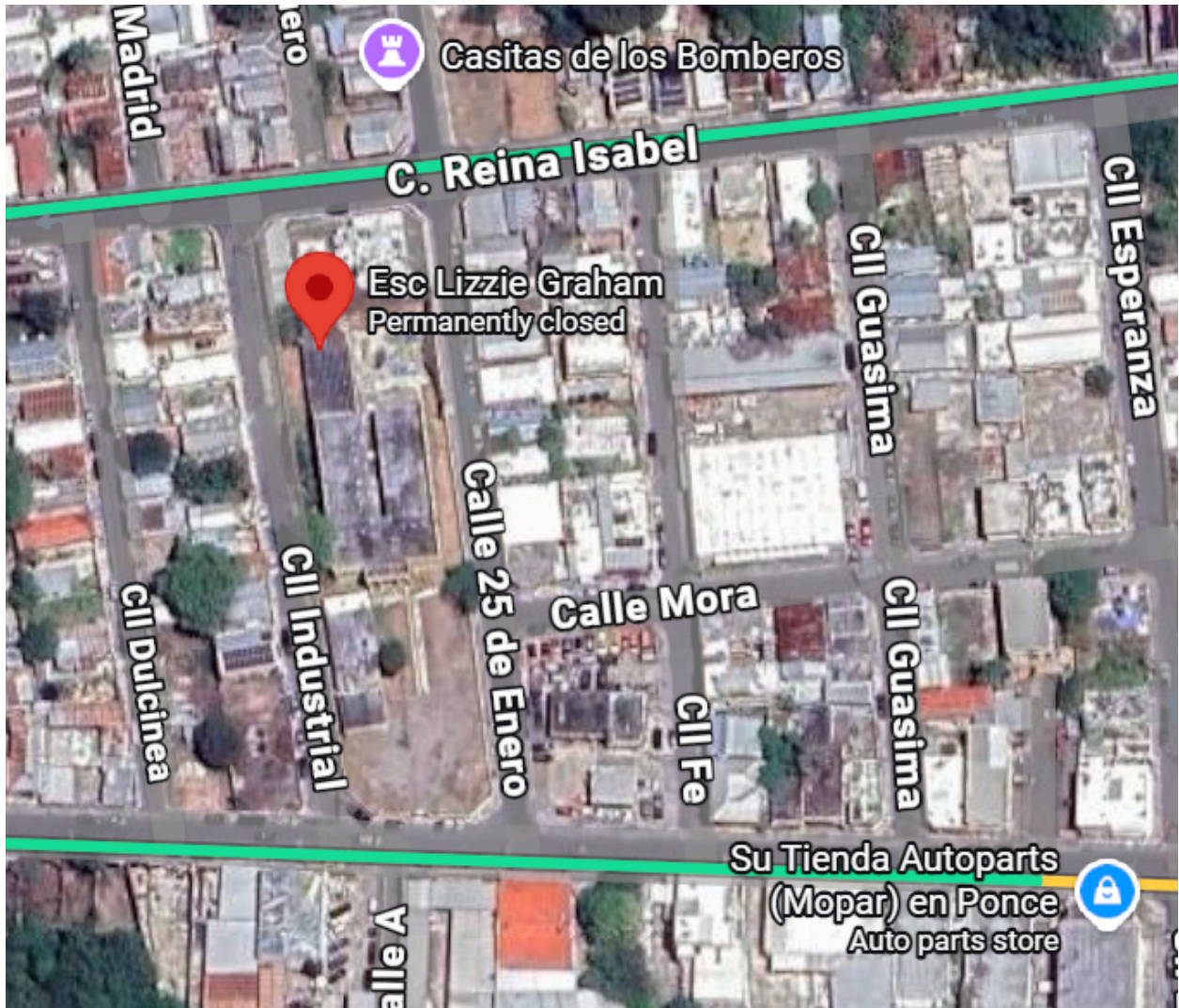
FY26 EPA Brownfields Cleanup Grant

Site Location Map

Applicant: Autonomous Municipality of Ponce, Puerto Rico

Site: Former Lizzie Graham School

Address: Calle Villa #230, Ponce, Puerto Rico 00730



FY26 EPA Brownfields Cleanup Grant

Narrative

Applicant: Autonomous Municipality of Ponce, Puerto Rico

Site: Former Lizzie Graham School

Address: Calle Villa #230, Ponce, Puerto Rico 00730

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

The Former Lizzie Graham School is a municipally owned, vacant facility in central Ponce, Puerto Rico, within a mixed residential and institutional corridor. Hazardous building materials and environmental conditions, confirmed by Phase I/II Environmental Site Assessments (ESA), prevent lawful occupancy or reuse and contribute to blight and underutilization in the surrounding neighborhood. EPA Brownfields Cleanup Grant funding is required to eliminate environmental risks and regulatory barriers, enabling regulatory closure and addressing site-specific challenges affecting the target area.

b. Description of the Proposed Brownfield Site

The 0.87-acre site (within a 1.128-acre parcel) has been vacant since its closure as a public elementary school in 2017 and contains three single-story structures and associated paved areas. Environmental investigations, including a Phase I (March 2022) and a Phase II (April 2025) ESA, confirmed the presence of asbestos-containing materials, lead-based paint, and regulated universal wastes requiring licensed abatement and disposal. Prolonged vacancy and structural deterioration have resulted in site conditions that prevent lawful occupancy or reuse under federal and Commonwealth regulations, requiring regulated remediation to achieve regulatory closure.

Revitalization of the Targeted Area

c. Reuse Strategy and Alignment with Revitalization Plans

Cleanup is a prerequisite for regulatory closure and any future lawful reuse of the Former Lizzie Graham School. Following cleanup, the Municipality intends to pursue reuse of the site as a community-serving educational facility focused on students with disabilities, consistent with identified local needs. All post-cleanup rehabilitation, capital improvements, and operations will be funded separately and are outside the scope of this EPA grant.

The projected reuse aligns with the Municipality of Ponce's Comprehensive Development and Land Use Plan, which prioritizes adaptive reuse of vacant public facilities, neighborhood revitalization, and expanded access to education and health-related services in underserved areas. Community input on future reuse priorities was incorporated through EPA-required public notification and stakeholder engagement activities, including public meetings and document review, as described in Section 2.

The site is not located within a federally designated floodplain; therefore, floodplain considerations do not affect the proposed reuse strategy.

d. Outcomes and Benefits of Reuse Strategy

Cleanup of the Former Lizzie Graham School will deliver measurable outcomes consistent with EPA Brownfields objectives:

Environmental and Health Outcomes

- Elimination of exposure pathways from lead-based paint, asbestos-containing materials, and regulated contaminants.
- 0.87 acres returned to safe, lawful use through regulatory closure.
- Reduced exposure risk for residents and sensitive populations.
- Site restored to EPA and Commonwealth health-based standards prior to any reuse.

Economic and Community Benefits (Post-cleanup, non-EPA-funded)

- Future reuse will create 40–60 permanent jobs and leverage non-EPA funding for rehabilitation and operations.
- Transformation of a long-vacant brownfield into a nonprofit, public-serving facility, supporting neighborhood stability along the Calle Villa corridor.

Resilience and Energy Benefits (Post-cleanup)

- Future facility resilience will be enhanced through energy efficiency, on-site renewable energy, and design for disaster resistance.
- Post-cleanup reuse will reduce operating costs and greenhouse gas emissions.

All post-cleanup employment, infrastructure improvements, and operational activities will be funded through non-EPA sources and implemented only after regulatory closure. These outcomes directly correlate to the proposed reuse strategy and depend on EPA-funded cleanup to remove regulatory barriers.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

Phase II ESA identified the need for limited supplemental site characterization to finalize contaminants of concern, delineate the horizontal and vertical extent of soil and groundwater exceedances, and complete the Analysis of Brownfield Cleanup Alternatives (ABCA) required for cleanup implementation. These activities are necessary to meet remedial objectives for soils exceeding Puerto Rico Soil Standards and groundwater exceeding PRWQS Class SG, EPA MCLs, and vapor intrusion screening levels.

The Municipality has formally requested EPA Region 2 Supplemental Targeted Brownfields Assessment (TBA) assistance to conduct this targeted investigation. If Supplemental TBA support is not available, the Municipality will pursue limited non-EPA municipal or Commonwealth environmental assessment resources solely as a contingency to prevent delays in cleanup implementation.

In addition, limited supplemental characterization (estimated cost \$77,000) has been incorporated into this EPA Cleanup Grant budget and workplan as a contingency. All characterization will be conducted only if necessary and solely to finalize remediation boundaries and remedial design as part of cleanup implementation and regulatory closure, in accordance with the EPA-approved workplan. Identified resources are relevant and sufficient to complete the required characterization without interrupting remediation.

f. Resources Needed for Site Remediation

The Municipality of Ponce requests \$4,483,740 in EPA Brownfields Cleanup Grant funding to implement the ABCA-selected cleanup alternative, including procurement of licensed contractors, hazardous materials abatement, soil remediation, confirmatory sampling, laboratory analysis, regulatory documentation, and EPA-required community notification. The requested amount is based on the Phase II ESA, certified abatement estimate, and ABCA cost analysis, and is sufficient to complete all eligible remediation activities. No non-EPA remediation funding is secured or required.

g. Resources Needed for Site Reuse

All funding for post-cleanup reuse, building rehabilitation, and site operations will be secured and expended only after EPA-funded cleanup and regulatory closure are completed. No reuse or redevelopment funding is requested or included in this application.

Secured in-kind operational resources are in place with the Puerto Rico Department of Education (certified teachers) and the U.S. Department of Transportation (paratransit services). In addition, the Municipality of Ponce participates in the FCC E-Rate Program, which will support broadband and network infrastructure for the site following cleanup.

The Municipality intends to allocate municipal capital funds in Fiscal Year 2026–2027 to support post-cleanup rehabilitation, subject to budget availability and legislative approval.

Additional post-cleanup resources, including USDA Child Nutrition Programs and philanthropic support, will be pursued after regulatory closure.

All reuse-related improvements and services will be financed exclusively with non-EPA funds.

h. Use of Existing Infrastructure

The site contains existing school buildings, paved areas, and public utility connections that cannot be lawfully used due to documented contamination. EPA-funded cleanup will remove environmental hazards and regulatory barriers, allowing reuse of these existing structures and infrastructure without new site development. Any modernization, ADA accessibility improvements, or system upgrades needed for reuse will occur only after regulatory closure and will be funded through non-EPA sources.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community’s Need for Funding

The Former Lizzie Graham School is located in a densely populated, low-income corridor of Ponce, Puerto Rico, with limited local capacity to finance environmental remediation. EPA EJScreen and U.S. Census data show that approximately 85% of residents are low income, unemployment is approximately 20%, and 69% of residents have limited English proficiency, demonstrating constrained fiscal capacity and limited access to private or philanthropic remediation resources.

Environmental indicators further show elevated nitrogen dioxide, toxic air releases, and traffic exposure. Because contamination at the site legally prohibits lawful occupancy or reuse, local or private funding cannot be used to address these conditions.

EPA Brownfields Cleanup Grant funding is therefore the only feasible funding source to remove site-specific hazards and eliminate regulatory barriers preventing lawful reuse of this municipally owned property.

b. Health or Welfare of Sensitive Populations

EPA-defined sensitive populations near the Former Lizzie Graham School include children, older adults, individuals with disabilities, and residents with chronic respiratory and cardiovascular conditions. Asthma rates in Puerto Rico are approximately 16% among children and 14% among adults, adult diabetes prevalence is 16–18%, and adult disability prevalence is approximately 22% [CDC; PR DOH].

The Phase II ESA identified lead-based paint, asbestos-containing materials, petroleum-related contaminants, and regulated wastes that create exposure pathways for these populations. EPA-funded cleanup, as a prerequisite to any future reuse, will remove these hazards, eliminate exposure routes, and achieve regulatory closure, directly reducing threats to sensitive populations.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions

CDC and Puerto Rico Department of Health data show that southern Puerto Rico has higher-than-average rates of asthma and cancer, particularly among children and older adults; 71,769 invasive cancer cases were diagnosed between 2016 and 2020, and lifetime cancer risk is estimated at 41.5% (PR Cancer Registry; CDC). Congenital heart defects occur at approximately 9.5 per 1,000 live births, exceeding U.S. baseline rates.

The Phase II ESA identified site hazards that create exposure pathways for a population already experiencing elevated asthma, cancer, and certain birth defect rates. EPA-funded cleanup will remove these hazards, eliminate exposure pathways, and achieve regulatory closure, thereby reducing localized environmental risk for populations with greater-than-normal incidence of adverse health conditions prior to any lawful reuse.

d. Economically Impoverished/Disproportionately Impacted Populations

The neighborhood surrounding the Former Lizzie Graham School is an economically distressed urban area with poverty and median household income levels significantly below Puerto Rico and U.S. averages (U.S. Census Bureau, ACS). Residents lack the financial capacity to address environmental contamination or pursue private remediation. These conditions have been further intensified by Hurricanes Irma and María (2017) and the 2020 earthquake sequence, which significantly strained municipal and household resources.

EPA Cleanup Grant funding is therefore required to remove environmental threats that would otherwise remain unaddressed and to return the property to a condition meeting regulatory health and safety standards for a population with no alternative means to remediate the site.

Community Engagement

e. Project Involvement and f. Project Roles

The Municipality of Ponce, as property owner and grant applicant, will retain full responsibility for cleanup implementation and compliance with all EPA Brownfields Cleanup Grant requirements. Municipal entities participate directly in cleanup planning, oversight, and public engagement to ensure regulatory compliance, fiscal accountability, and timely execution.

Key participating entities include: the Department of Education (site stewardship and coordination), Mayor’s Office (executive oversight), Infrastructure/Environment/Public Works (technical coordination and contractor interface), Finance Department (grant fiscal management), Legal Services (contract and regulatory compliance), Procurement/Bidding Office (federally compliant contracting), Permitting Office (permit coordination), Planning and Land Use (consistency with land use plans), Health and Wellness (health and risk communication), Police Department (site security), Emergency Management (disaster preparedness), Internal Audit (internal fiscal controls), and Human Resources (project staffing and labor compliance).

The Municipal Legislature participates in its statutory role by approving the resolution required to accept the EPA grant award and by authorizing post-award budgetary actions.

Community representatives participate through EPA-required public meetings, comment periods, and review of key documents (ABCA, Cleanup Plan, and Community Involvement Plan). Each entity’s role is directly tied to cleanup implementation, regulatory compliance, or EPA-mandated public participation. All post-cleanup reuse planning and activities will occur separately and outside the scope of EPA funding.

g. Incorporating Community Input

The Municipality will communicate cleanup progress and schedules through EPA-required public meetings, written notices, and project updates. At least two public meetings per year will be held, supplemented by virtual meetings, bilingual materials, and public comment periods to ensure access for residents unable to attend in person. Community input will be solicited through meetings and written submissions, documented in the administrative record, and addressed through meeting summaries and written responses. This process ensures that community input is meaningfully considered in cleanup decision-making.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan and Description of Tasks/Activities and Outputs

The proposed cleanup plan addresses all environmental conditions identified in the Phase I and Phase II Environmental Site Assessments and evaluated in the Analysis of Brownfield Cleanup Alternatives (ABCA), including contaminated soils, limited groundwater impacts, and hazardous building materials requiring regulated abatement and disposal.

All activities implement the ABCA-selected cleanup alternative and are designed to achieve regulatory closure and protection of human health and the environment in accordance with EPA and Commonwealth requirements.

EPA-funded tasks include:

- Competitive procurement and project management;
- Contingent supplemental site characterization, if required, to support cleanup design;
- Excavation, transport, and disposal of contaminated soils, with grading and stabilization for regulatory closure;
- Certified abatement and disposal of lead-based paint, asbestos-containing materials, fluorescent lamps, and electrical ballasts;
- Confirmatory sampling, air monitoring, inspections, and preparation of regulatory closure documentation; and

- EPA-eligible community health monitoring and cleanup-related outreach, if approved in the final workplan.

Detailed outputs and deliverables are provided in Section 3.e.

b. Project Implementation

The Municipality of Ponce will implement the cleanup through competitively procured, licensed contractors in accordance with all required EPA-approved planning documents. Contractors will perform the ABCA-selected remedial actions, including hazardous materials abatement, soil remediation, regulated waste management, confirmatory sampling, and preparation of regulatory documentation.

Upon completion of field activities, clearance testing will be conducted and a Cleanup Completion Report will be submitted for regulatory review and site closure by EPA Region 2 and the Puerto Rico Department of Natural and Environmental Resources (DNER). Optional community health monitoring and outreach, if approved by EPA, will be limited to non-clinical, cleanup-related activities.

No subawards are included. Municipal in-kind support (e.g., coordination and site access) will not be charged to the EPA grant.

c. Anticipated Project Schedule

The Municipality of Ponce will implement all EPA-funded cleanup activities at the Former Lizzie Graham School under a four-year, milestone-driven schedule designed to ensure completion within the EPA Brownfields period of performance.

Anticipated Cleanup Project Schedule
<p>Pre-Award Programmatic Activities (up to 90 days prior to award): Preparation of procurement documents, regulatory coordination, and initiation of community notification. No field activities will occur prior to award.</p>
<p>Year 1 (Months 1–12): Mobilization and Regulatory Approvals Execution of the cooperative agreement; competitive procurement of qualified contractors; approval of QAPP and RAWP; initial sampling (if required); mobilization and site preparation; project briefing.</p>
<p>Year 2 (Months 13–24): Primary Remediation Activities Implementation of soil remediation and hazardous materials abatement; regulated waste disposal; regulatory inspections; performance and financial reporting; continued community notification.</p>
<p>Year 3 (Months 25–36): Completion of Remediation and Site Restoration Completion of remaining remediation activities; confirmatory sampling and clearance testing; and preparation of regulatory closure documentation;</p>
<p>Year 4 (Months 37–48): Regulatory Closure and Project Closeout Submission of the Final Remedial Action Report and regulatory closure documentation to EPA Region 2 and DNER; completion of final reporting and closeout requirements; and community notification of cleanup completion.</p>

All milestones are achievable, account for potential contingencies, and ensure that cleanup and regulatory closure will be completed within the four-year period of performance.

d. Task/Activity Lead

Task leadership for cleanup of the Former Lizzie Graham School is assigned as follows:

- **Project Administration and Grant Oversight:** Municipality of Ponce (grant recipient, procurement, fiscal compliance, EPA reporting)
- **Technical Oversight:** Qualified Environmental Professional (QEP), procured in accordance with 40 CFR §312.10
- **Remediation and Abatement:** Licensed Environmental Remediation Contractor (under QEP direction)
- **Regulatory Review and Site Closure:** Puerto Rico Department of Natural and Environmental Resources (DNER)
- **Health Monitoring (if implemented):** Puerto Rico Department of Health (EPA-approved, non-clinical only)
- **Community Engagement:** Municipality of Ponce per the EPA-approved Community Involvement Plan

All task leads are appropriate based on statutory authority, technical capacity, and regulatory requirements for cleanup implementation and regulatory closure.

e. Outputs

Anticipated outputs are measurable, EPA- and DNER-verifiable deliverables directly linked to cleanup implementation, regulatory compliance, and site closure, including:

- 1 EPA- and DNER-approved RAWP
- 1 EPA- and DNER-approved QAPP
- 1 HASP and 1 Waste Management Plan
- 1 Supplemental Site Characterization Report (if required)
- Removal and off-site disposal of contaminated soils and hazardous building materials (with disposal manifests)
- 1 Abatement Completion Report
- 1 Final Remedial Action Report
- 1 Regulatory closure certification/concurrence letter
- At least 8 community notices and/or public meetings during cleanup implementation
- Quarterly and annual EPA performance reports for the duration of the grant

All outputs are EPA-eligible and required to document cleanup progress and achieve regulatory closure.

f. Cost Estimates

Cost Estimate Development and Methodology

Cost estimates were developed in accordance with the EPA Brownfields FY26 Cleanup Grant Guidelines using multiple technical and financial reference sources, including the Phase II Environmental Site Assessment, a certified hazardous materials abatement cost estimate prepared by qualified professionals, the Analysis of Brownfield Cleanup Alternatives (ABCA), unit pricing from comparable remediation projects in Puerto Rico, applicable municipal salary benchmarks and fringe benefit schedules, and EPA budget development guidance.

All costs are EPA-eligible and directly attributable to implementation of the ABCA-selected cleanup alternative and achievement of regulatory closure. Major cost categories are calculated using unit-based methodologies tied to verified quantities, including square footage of hazardous

materials requiring abatement, cubic yards of contaminated soil requiring excavation and disposal, and laboratory analytical units for confirmatory sampling and air monitoring. Detailed unit costs and calculations are provided in the Budget Narrative attachment.

Limited supplemental site characterization costs are included only if required to refine remediation boundaries and are restricted to cleanup design and closure activities, consistent with the EPA-approved workplan.

The budget includes only costs necessary for project management, required planning documents, hazardous materials abatement, soil remediation, confirmatory sampling and air monitoring, regulatory reporting, EPA-required community notification, and project closeout. Administrative costs are embedded within task categories and do not exceed 5% of the total EPA funds requested. All proposed costs are reasonable, realistic, and fully correlated to the proposed cleanup tasks and outputs.

g. Plan to Measure and Evaluate Environmental Progress and Results

The Municipality of Ponce will implement a structured and verifiable system to track and evaluate environmental progress and results for the Former Lizzie Graham School cleanup in accordance with EPA Brownfields requirements. Project outcomes will be demonstrated through completion of regulatory cleanup milestones, including elimination of exposure pathways, achievement of regulatory site closure, and compliance with the ABCA-selected remedial alternative.

The Project Manager and Qualified Environmental Professional (QEP) will maintain and validate all performance data related to project outputs and outcomes. Progress will be reviewed internally on a monthly basis and with EPA on a quarterly basis. All required data will be reported through EPA's ACRES system and quarterly and annual grant reports. Any variance from the approved workplan or schedule will be documented and addressed through corrective actions in coordination with EPA.

Detailed outputs and deliverables are provided in Section 3.e.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure

As site owner and grant recipient, the Municipality of Ponce retains authority over project execution, procurement, and compliance. Executive oversight is provided by the Office of the Mayor, with grant administration managed by the Municipal Department of Education through the External Resources Officer.

A project-dedicated, grant-funded Project Manager, supported by an Administrative Assistant, will coordinate cleanup activities, regulatory approvals, and project documentation. A competitively procured Qualified Environmental Professional (QEP) will provide technical direction and coordinate with EPA and the Puerto Rico Department of Natural and Environmental Resources (DNER).

Municipal Finance, Procurement, and Legal offices provide fiscal oversight, procurement compliance, and legal review, ensuring federally compliant internal controls and segregation of duties under 2 CFR Part 200.

b. Description of Key Staff

Brownfields Project Manager (Project-Dedicated, Grant-Funded)

Serves as primary point of contact with EPA and is responsible for day-to-day project implementation, adherence to the EPA-approved workplan, contractor coordination, regulatory compliance, and required performance and financial reporting.

Grant Compliance & Documentation Officer

Ensures compliance with EPA and federal grant requirements; manages project records; supports audit readiness; and coordinates required submissions with Finance and Procurement offices.

Administrative Assistant (Project-Dedicated, Grant-Funded)

Provides administrative support for documentation management, procurement tracking, invoice processing, meeting coordination, and compliance recordkeeping.

External Resources Officer – Municipal Department of Education

Provides institutional continuity and coordinates grant compliance with the Finance Department. Brings over four years of experience managing federal assistance programs, including U.S. Department of Labor Workforce Innovation and Opportunity Act (WIOA) Title II funds as a subrecipient and other competitive federal and Commonwealth grants.

Qualified Environmental Professional (QEP) (Competitively Procured)

Provides technical direction; prepares and implements cleanup plans; oversees field activities; and ensures regulatory compliance. Credentials meet 40 CFR §312.10 requirements.

Municipal Finance, Procurement, and Legal Offices

Provide federal accounting, procurement oversight, and legal review for all cleanup-related activities.

All staff roles directly align with defined cleanup tasks and are supported by demonstrated experience administering federally funded programs, formal internal controls, and clear lines of authority, resulting in strong programmatic capacity and low implementation risk.

c. Acquiring Additional Resources

All external services (QEPs, remediation and abatement contractors, laboratories, and waste vendors) will be obtained through open, competitive procurement in accordance with 2 CFR Part 200, EPA Assistance Regulations, and applicable Commonwealth and municipal laws. No contractors have been preselected. All external entities will serve solely as contractors providing discrete, fee-for-service technical services for cleanup; no subawards are planned.

Procurement will use publicly advertised solicitations, with selection based on qualifications, regulatory compliance history, and cost, and with conflict-of-interest safeguards in place. The Project Manager and QEP will oversee contractor performance through contract administration, milestone verification, and review of EPA-required deliverables for compliance.

Past Performance and Accomplishments

e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Financial Assistance Agreements

While the Municipality of Ponce has not previously received an EPA Brownfields Grant, it has a demonstrated record of successfully managing large-scale federal financial assistance agreements comparable in scope, regulatory complexity, and reporting requirements to the proposed cleanup project. Recent examples include:

1. U.S. DOT – Federal Transit Administration (FTA) – SITRAS System

Funding: Approximately \$40,000,000 (13 federal grants and 6 interagency agreements).

Purpose: Operation and modernization of regional public transportation serving low-income, elderly, and disabled residents.

Accomplishments:

- Operation of fixed-route and demand-response transit services;
- Vehicle acquisition and fleet upgrades;
- Expanded mobility for disadvantaged populations.

Compliance: Maintains approved asset management plans; complies with federal procurement and civil rights requirements; subject to continuous federal oversight and audits.

2. HHS – Office of Head Start (OHS)

Funding: \$39,020,235 (2021–2026); \$8,453,594 in FY26.

Purpose: Early childhood education, health, and nutrition services in 23 communities.

Accomplishments:

- Annual service to 659 children and pregnant women;
- Operation of 45 classrooms/environments;
- Sustained full enrollment and program expansion.

Compliance: Passed federal monitoring and CLASS reviews; five consecutive Single Audits with no findings; continuation funding awarded without re-competition.

3. HUD – Community Development Block Grant (CDBG)

Funding: \$2,362,953

Purpose: Public infrastructure improvements, public services, and housing rehabilitation for low- and moderate-income populations.

Accomplishments:

- Multiple service center grants awarded (including CEP-CEP and Ernestina Center);
- Infrastructure projects completed (e.g., paving and rehabilitation);
- Delivery of housing and community services to eligible households.

Compliance: Program administered in accordance with HUD-approved plans and budgets; subject to federal monitoring and audits with no material findings.

Relevance and Readiness

These programs demonstrate the Municipality’s capacity to administer multi-million-dollar federal awards with strong internal controls, timely reporting, regulatory compliance, and measurable outputs and outcomes. This experience is directly comparable to the proposed Brownfields Cleanup project in terms of procurement, contractor oversight, financial management, performance tracking, and community engagement, and demonstrates readiness to successfully implement the proposed EPA-funded cleanup.

NARRATIVE ATTACHMENT

Documentation of Committed Leveraged Resources

FY26 EPA Brownfields Cleanup Grant – Single Site Cleanup

Applicant:

Municipality of Ponce, Puerto Rico

Site:

Former Lizzie Graham School

Calle Villa #230

Ponce, Puerto Rico

Purpose of This Attachment

This attachment is submitted in response to the FY26 EPA Brownfields Cleanup Grant requirement for:

“Documentation indicating committed leveraged resources, if applicable (see Sections 4.C.(1).f. and 4.C.(1).g.).”

The documentation included herein substantiates **secured, non-EPA resources that will support post-cleanup reuse and operations** of the Former Lizzie Graham School following regulatory closure.

Important Clarifications

- The resources documented in this attachment are **not cost share or match** for this EPA Cleanup Grant.
- These resources will be used **only for post-cleanup reuse and operation**, and **not for remediation or cleanup activities** funded by EPA.
- No EPA Cleanup Grant funds will be used for reuse, redevelopment, or operational costs.
- All cleanup activities will be funded exclusively through the requested EPA Brownfields Cleanup Grant.

Secured Leveraged Resources Documented in This Attachment

This attachment includes documentation of the following **secured leveraged resources**:

1. Puerto Rico Department of Education (PRDE)

In-kind operational commitment

Provision of certified teachers under an existing interagency collaboration framework for future educational use of the site.

2. FCC E-Rate Program (Municipal Participation)

Secured institutional participation

The Municipality of Ponce is an active participant in the FCC E-Rate Program, which will support broadband and network infrastructure at the site after cleanup and reuse implementation.

3. Municipal Paratransit / SITRAS (U.S. DOT / FTA-funded system)

Provision of paratransit transportation services for eligible students to and from the site following cleanup.

4. Planning Resources (Not Secured Funding)

Any documentation related to municipal capital planning or future funding considerations is provided **solely as evidence of planning and intent**, and:

- Does not constitute a legally binding commitment;
- Is subject to budget availability and legislative approval;
- Is not claimed as secured leveraged funding for scoring purposes.

Relationship to Narrative

This attachment supports and is consistent with:

- **Section 1.g – Resources Needed for Site Reuse**
- **Section 4.C – Programmatic Capability**

No resources in this attachment duplicate or replace EPA Cleanup Grant funds requested under this application.

Certification

The Municipality of Ponce certifies that all documentation included in this attachment accurately represents institutional commitments or participation currently in place and is provided solely for EPA reviewer verification.

I. THRESHOLD CRITERIA RESPONSES

FY26 EPA Brownfields Cleanup Grant

Applicant: Autonomous Municipality of Ponce, Puerto Rico

Site: Former Lizzie Graham School

Address: Calle Villa #230, Ponce, Puerto Rico 00730

1. Applicant Eligibility

The Municipality of Ponce is an eligible applicant as a general purpose unit of local government under CERCLA §§101(27) and 104(k). As a political subdivision of the Commonwealth of Puerto Rico, the Municipality is authorized to receive and administer EPA Brownfields funding. The Municipality is not a 501(c)(4) entity.

2. Previous EPA Brownfields Cleanup Grant Funding

The Municipality of Ponce has not previously received an EPA Brownfields Cleanup Grant for the subject site.

3. Open Multipurpose Grant

The Municipality does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Municipality of Ponce is the sole fee-simple owner of the Former Lizzie Graham School located at Calle Villa #230, Ponce, Puerto Rico. Ownership is documented by a recorded deed and Property Ownership Certification issued by the Puerto Rico Property Registry. The Municipality will retain ownership of the site throughout the grant period and any required post-performance duration.

(See attached: Property Ownership Certification)

5. Basic Site Information

- Site Name: Former Lizzie Graham School
- Address: Calle Villa #230, Ponce, Puerto Rico 00730
- Parcel Size: ~1.13 acres
- Current Use: Vacant, former public school
- Zoning: Institutional / Public Use
- Owner: Municipality of Ponce

6. Status and History of Contamination

Environmental assessment has documented site contamination through EPA-funded Phase I (2022) and Phase II (2025) Environmental Site Assessments conducted under the EPA Region 2 Targeted Brownfields Assessment (TBA) Program.

The Phase II ESA identified:

- Lead-contaminated soils
- Polycyclic aromatic hydrocarbons (PAHs) in shallow soils
- Petroleum-related groundwater impacts
- Arsenic exceedances
- Regulated hazardous building materials (lead-based paint, lamps, ballasts)

7. Brownfield Site Determination

The site meets the definition of a brownfield under CERCLA §101(39) and is complicated by hazardous substances and contaminants that prevent lawful reuse without cleanup.

8. Environmental Assessment

- Phase I ESA: 2022 (EPA TBA, ASTM E1527-21-compliant)
- Phase II ESA: 2025 (EPA TBA)
- Supplemental Investigation: Recommended and planned (January 2026)

All assessments conducted per ASTM and EPA Brownfields standards.

9. Voluntary Cleanup Program/State Oversight (NOFO Section 2.B. (9))

The site will be remediated under regulatory oversight by the Puerto Rico Department of Natural and Environmental Resources (DNER) or an equivalent Commonwealth cleanup authority prior to and during remediation. The completed Phase II ESA and planned supplemental investigation provide sufficient basis for cleanup planning.

10. Enforcement or Legal Actions (NOFO Section 2.B. (10))

There are no known federal, Commonwealth, or local enforcement actions, liens, or legal proceedings affecting the site.

11. Property-Specific Determination (NOFO Section 2.B. (11))

No property-specific determination is required for the Former Lizzie Graham School.

12. Property Ownership Eligibility—Hazardous Substances and Petroleum (NOFO §2.B. (12)(a) and (b))

- The Municipality acquired the property prior to the discovery of contamination and did not cause or contribute to the release of hazardous substances.
- The site meets CERCLA §104(k) eligibility for hazardous substance brownfields.
- Petroleum impacts are attributable to an off-site leaking underground storage tank (LUST); the Municipality did not cause or exacerbate petroleum releases.

13. Cleanup Authority and Oversight Structure (NOFO Section 2.B.(13))

Cleanup will be conducted under the oversight of:

- EPA Region 2 Brownfields Program
- Puerto Rico Department of Natural and Environmental Resources (DRNA) Voluntary Cleanup Program (or equivalent regulatory authority)
- A Qualified Environmental Professional (QEP), retained through a federally compliant procurement process
- Licensed environmental remediation and abatement contractors

The Municipality of Ponce will serve as the cooperative agreement recipient and project sponsor, maintaining legal authority and site access throughout the project.

14. Community Notification and Involvement (NOFO Section 2.B.(14))

The Municipality has conducted and will continue to conduct EPA-compliant community notification and public involvement activities, including:

- Community meetings and public briefings
- Posted site and neighborhood notices
- Public comment period for the Draft ABCA
- Documentation of engagement activities and responses
(See attached: Community Notification Documentation)

15. Contractors and Subrecipients (NOFO Section 2.B.(15))

No contractors have been procured and no subrecipients have been named prior to award. All procurement will be conducted post-award in full compliance with:

- 2 CFR Part 200
- 2 CFR Part 1500
- 40 CFR Part 33 (DBE)
- EPA Brownfields Procurement Guidance

If subrecipients are required in the future (e.g., for community-based health monitoring), the Municipality will comply with all federal eligibility, risk assessment, and monitoring requirements.

16. Solicitation Documents and Contracts

No procurement actions or contracts have been executed prior to award. All procurement will occur post-award.

17. Eligible Cleanup Activities

All proposed activities are eligible under CERCLA §104(k) and EPA Cleanup Grant guidelines and include cleanup, abatement, confirmatory sampling, site restoration, community engagement, optional health monitoring, and allowable administrative costs. No ineligible activities are proposed.

18. Administrative Cost Cap and Cost Share

No cost share is proposed or required. All administrative costs are capped below the 5% statutory limit in accordance with CERCLA §104(k) and EPA guidance.

Certification and Attachments

The Municipality of Ponce certifies full compliance with all FY26 EPA Brownfields Cleanup Grant threshold criteria.

Supporting documentation (ownership, ESA reports, community notification, etc.) is included as attachments.

Conclusion

The Municipality of Ponce affirms that this application and all supporting documentation demonstrate complete compliance with every FY26 NOFO Section 2.B Threshold Criterion. This affirmation is provided to enable rapid EPA review and threshold approval, ensuring eligibility for full evaluation and funding consideration.