

THRESHOLD CRITERIA

A. Applicant Eligibility: The Kansas Department of Health and Environment (KDHE) was created by the Kansas Legislature in 1974 when the Kansas State Department of Health became the Department of Health and Environment. KDHE is a duly authorized agency of the State of Kansas, created by act of the legislature. KDHE oversees air, water, solid waste, hazardous waste, and radiation regulatory programs. KDHE's Bureau of Environmental Remediation, through cooperative agreements with EPA Region 7, functions as the lead agency responsible for assessment and cleanup of CERCLA –related contamination (nonfederal lead sites).

B. Letter: A letter from Roderick L. Bremby, Secretary, Kansas Department of Health and Environment, has been provided as a cover letter to this grant application.

RANKING CRITERIA

A. Budget: Since the program's inception in 1998, KDHE's Brownfields Targeted Assessment program has grown successfully to a level that resources need to be carefully allocated for equitable distribution to all Kansas communities. In an effort to obtain funding for a specific targeted area within the state that has demonstrated a willingness to promote Brownfields redevelopment, KDHE has requested additional funding earmarked for these counties. KDHE requires financial assistance from EPA as:

Project Tasks	Task 1	Task 2	Task 3	Task 4	Task 5	
<i>Budget Categories</i>	<i>Site Inventory, Eligibility Screening & Prioritization¹</i>	<i>Community Outreach & Engagement²</i>	<i>Phase I Assessment³</i>	<i>Phase II Assessment⁴</i>	<i>Cleanup & Strategic Planning⁵</i>	<i>Totals</i>
Personnel	\$3,000	\$3,000	3,000	3,000	\$3,000	\$15,000
Travel⁶	\$2,500					\$2,500
Training⁷	\$1,500					\$1,500
Equipment⁸						
Supplies⁹		\$2,000				\$2,000
Contractual¹⁰	\$17,000	\$6,000	\$42,000	\$104,000	\$10,000	\$179,000
Totals	\$24,000	\$11,000	\$45,000	\$107,000	\$13,000	\$200,000

Notes:

- ¹ Development of target area inventories within each county, GIS database, and scoring template for prioritization
- ² Coordination of public meetings, interactive workshops, and various distribution materials.
- ³ Conduct approximately 16 to 20 Phase I assessments based on inventory and prioritization findings.
- ⁴ Conduct approximately five to six Phase II assessments based on Phase I findings.
- ⁵ Electronic document management system and two to three Analysis of Brownfield Cleanup Alternative studies.
- ⁶ Travel to National Brownfields Conference and attendance at regional Brownfields training for RC&D staff.
- ⁷ Registration fees for relevant local and regional training.
- ⁸ To be provided by KDHE as in-kind contribution.
- ⁹ Media production expenses, hall rentals, and potential software upgrades to support electronic media.

¹⁰ Environmental consulting and engineering support through existing KDHE federally procured vendors.

In-kind: KDHE realizes no in-kind match is required for assessment grants, however, KDHE will augment assistance from EPA with staff resources and equipment (wherever possible) for the duration of the grant activity.

Task 1. Site Inventory, Eligibility Screening and Prioritization: The first step in the grant process will be to coordinate with each county to develop a preliminary site inventory of targeted areas identified within each county. This may involve retaining one of KDHE's contractors to meet with each county and conduct a "windshield survey" of areas that may require the most assistance. Next, the eligibility of the sites as brownfields will be determined. KDHE will coordinate screening of sites prioritized by the Counties under the Plan for eligibility relative to "liable & viable", unique to petroleum assessments under the Revitalization Act. This will be done through KDHE's staff working in coordination with the KDHE Underground Storage Tank Section. Consistent with Appendix 3, section 3.3.2 of the guidelines, KDHE elects to use existing screening procedures set forth in Kansas laws and regulations and in use statewide. Once the initial inventory has been completed, prioritization criteria will be developed and then the sites will be prioritized. This task will also include travel of up to two key community staff to national Brownfields and annual EPA regional Grantees workshops and conferences.

Task 2. Community Outreach and Coordination: Stakeholders identified by efforts on the part of both KDHE and the Central Prairie Resource Conservation and Development (RC&D) will be incorporated into all outreach efforts throughout the grant period. Outreach will need to build public confidence against "fear of government" and promote access to properties for assessment. This may include opening communication channels between citizens and KDHE. Task 2 will produce fact sheets educating citizens about Brownfields development in general, as well as five fact sheets on grant-specific activities. Information reporting the progress of the grant will be added to KDHE's website repository of current and previous assessment reports. KDHE will convey to rural communities and owners of petroleum-related properties an understanding that grant funds can be used by the community to evaluate reuse of eligible leaking underground storage tank (LUST) properties that have met their base regulatory obligations. A theoretical example of this might be a corner lot with a now-closed service station having had a previous release of petroleum from an underground storage tank (UST). The owner may have cleaned up to commercial risk-based standards and reduced exposures by fencing the site and conducting long-term monitoring. Should the community view the location as having a higher and better use as a community park or service building requiring more stringent risk protection than required of the current owner, grant funding could potentially be used to evaluate the feasibility of cleanup for the better community good.

Task 3. Phase I Assessments: This task will likely not begin until after November 1, 2008. All Phase I Assessments will be conducted in accordance with 40 CFR Part 312 - Standards and Practices for All Appropriate Inquiries (AAI). KDHE will conduct Phase I

assessments on properties prioritized by the efforts expended in Task 1. Phase I assessments will identify recognized environmental conditions (RECs).

Task 4. Phase II Assessments: For Phase II Assessment activities, KDHE contractors will operate under KDHE's approved Quality Management Plan. Site-specific Quality Assurance Project Plans (QAPP) will be adopted for each property to be assessed. Some minor programmatic efforts (i.e., completion of property profile forms) will be done by contractors and are built into respective task budgets. Phase II Environmental Assessments will address identified RECs through sampling and analysis. Assessments will be designed and conducted under KDHE's existing Brownfields Targeted Assessment program. KDHE will review and approve sampling plans submitted by KDHE contractors. Phase II sampling will incorporate ASTM standards and the TRIAD approach as applicable to individual sites. Chemical concentrations in soil and ground water will be evaluated using KDHE's Risk-based Standards for Kansas (RSK) using the most current version of the RSK Manual. If deemed necessary by KDHE and the rural community, reports may include a preliminary cost-to-remedy analysis to support redevelopment planning and lay the ground work for an Alternative Brownfields Cleanup Analysis if a future EPA Brownfields cleanup or revolving loan fund grant is pursued. Phase II Assessments will be conducted by federally procured contractors already on contract with KDHE. Special KDHE evaluations relative to the theoretical example above in Task 2 would be conducted herein.

Task 5. Cleanup Planning: It may be necessary to conduct additional assessment activities at properties prior to initiating cleanup activities. These sampling activities will be conducted by either KDHE or a KDHE contractor. KDHE will provide technical expertise to these rural communities and guide them to the appropriate KDHE cleanup program.

B. Community Need:

1) This assessment grant will address Brownfields issues specific to rural counties currently within the Central Prairie RC&D Council. These counties include: Barton, McPherson, Rice, Pawnee, Stafford, Reno, Ellsworth, and Edwards counties. These counties are located in rural central Kansas, where populations are decreasing and communities are approaching the "ghost town" -like setting seen in many Wild West movies.

As the interstate highway system was developed in the United States, many previously utilized Kansas highways began to suffer from lack of use as Americans migrated to the newer interstate system. Within this eight county district, many gas stations that had depended on cross country travelers along US Highways 56 and 281 began to notice the financial ramifications of travelers utilizing the more popular interstate system. Throughout the years these gas stations began to disappear, leaving a legacy of abandoned property, often in prime central locations within many Kansas communities. Gone were the days of full service stations in small towns where gas station attendants would fill up your tank, wash your windshield, and provide directions to the local popular restaurant in a leisurely fashion. According to the KDHE Underground Storage Tank

(UST) database, the number of identified USTs currently in each respective county are: Barton County 167, Edwards County 37, Ellsworth County 55, McPherson County 115, Pawnee County 41, Reno County 238, Rice County 73, and Stafford County 43. Although many of these have been listed in the KDHE database, these only include UST sites that have been identified. Releases from abandoned, unregistered gas stations may not be included.

As Americans move to the more traveled interstate system, the younger generations of these smaller Kansas towns migrate to larger Kansas cities. Communities in these small towns struggle to maintain a vibrant community with a mix of old and young, traditional and modern, and maintain unique community features. Populations in these Kansas counties decrease and the number of vacant properties in downtown areas increases.

The US Census 2000 and information outlined in the Central Prairie RC&D 2006 Annual Report show the following demographic statistics for the area:

County	Total Population	Population over Age of 65	Median Household Income	Individuals Below Poverty Level	Real County Revenues Per Capita*	Employer Establishments*
Barton	28,205	18%	32,176	3,536	\$447	1,046
Edwards	3,449	21%	30,530	351	\$916	109
Ellsworth	6,525	20%	35,772	410	\$787	194
McPherson	29,554	17%	41,138	1,855	\$498	947
Pawnee	7,233	19%	35,175	793	\$731	193
Reno	64,790	16%	35,510	6,714	\$418	1,723
Rice	10,761	18%	35,671	1,049	\$628	302
Stafford	4,789	21%	31,107	555	\$727	151
<i>State Average</i>	<i>2,688,418</i>	<i>13%</i>	<i>40,624</i>	<i>257,829</i>	<i>\$807</i>	<i>709</i>

*1999 Data

The table above clearly illustrates the disproportionate number of senior citizens compared to the rest of the state, further illustrating the recent trend of younger generations migrating to more populated areas of the state. Additionally, median household incomes in six of these eight counties are at least 5,000 dollars below the state average.

2) This grant will allow KDHE and the RC&D Council to complete an inventory and characterization of the sites, determine the environmental condition of these properties, and plan the cleanup of the sites. This grant will provide the necessary assessments prior to a development organization or municipal entity acquiring the properties. Identifying the contaminants will also verify the suitability of the intended end-use. The degradation of abandoned service stations is an issue that will hopefully be further identified through this Brownfields Grant for the assessment of these clearly degraded and potentially contaminated areas. This grant will provide the assessments and cleanup planning

necessary to encourage developers in efforts to attach development in these floundering communities.

By identifying and addressing potential petroleum contamination from abandoned gas station properties, especially along historic Highway 56 and Highway 81, these corner properties in prime locations will be returned to productive use.

3) There are currently the following number of identified USTs sites in each respective county: Barton County 167, Edwards County 37, Ellsworth County 55, McPherson County 115, Pawnee County 41, Reno County 238, Rice County 73, Stafford County 43. This list only includes UST sites that have been identified in the KDHE database. These numbers may not reflect releases from abandoned, unregistered gas stations. Human health issues specific to petroleum contamination in these rural communities will be mitigated through appropriate Brownfield assessment activities.

KDHE staff was interviewed and confirmed these figures to be consistent with state records. Existing technical reports on file with KDHE will need to be reviewed to determine Phase II needs for eligible properties or for clearance on contiguous properties. Without further assessment, it is unknown if the sites are eligible or have petroleum contamination associated with each property or impacts to contiguous properties.

C. Site Selection Process:

1) Initially, each community partner within the RC&D will be asked to provide potential target properties for consideration under the grant. This may involve retaining one of KDHE's contractors to meet with each county and conduct a "windshield survey" of areas that may require the most assistance. Project area properties identified by the RC&D will be initially screened to determine the potential for the property to meet the definition of a Brownfield site based on historical property uses and eligibility criteria as well as public health and safety concerns and potential for reuse. Once screened, Phase I Assessments that comply with the All Appropriate Inquiry Standard will be conducted for these projects. Results from the Phase I Assessment will determine which properties require Phase II Assessments. In addition, KDHE will conduct "liable and viable" petroleum screenings for property eligibility as required by Kansas statute. This means that Phase I Assessments will include a determination of the corporate status of owners and previous owners. Throughout the assessment process KDHE will actively solicit input from project partners, stakeholders, and citizens, particularly in the affected neighborhoods, during the site selection task. KDHE will also create an evaluation matrix with weighting of the various evaluation criteria for potential Brownfield sites.

2) Although no specific inventory activities have been conducted for the grant area, the Central Prairie RC&D has conducted an initial in-house survey in an effort to identify potential candidates for activities under this grant. Also, several individual assessments have been completed for communities within the grant area including:

- The McPherson Museum Committee in McPherson County applied for KDHE assistance to conduct a Phase I Environmental Assessment in October 2002. The property had been utilized as a nursing facility since the 1940s. The former

owner of the facility donated the building to the McPherson Museum and Arts Foundation for use as the city's museum. A Phase I Assessment was required to complete the transaction.

- A non-for-profit organization, Inman Industrial, Inc., in McPherson County, applied for KDHE assistance to conduct a Phase I Environmental Assessment in August 2007. The property was utilized as a wheat milling facility from 1908 to 2001. The property has been donated to the Inman Historical Museum, which would like to return it to productive use.
- In April 2007 KDHE conducted a Phase I Brownfields Targeted Assessment (BTA) at the 624 7th Street BTA Property in Great Bend, Barton County, Kansas. The BTA was conducted for the city to evaluate a property they are proposing to sell for the purpose of redevelopment.
- KDHE conducted Phase I and II BTAs at the City of Lyons BTA Property in Lyons, Rice County, Kansas. The subject property occupies approximately 2.7-acres and has formerly been utilized as a truck stop/gasoline service center and restaurant. Based on information collected during the Phase I report, it appears that the all appropriate inquiry as a prospective purchaser has been completed with no significant data gaps. Based on data collected during the Phase II BTA, no significant environmental impacts were identified at the property. With the exception of removing the four USTs remaining on site, no further environmental action is necessary at the property.

3) Private land owner cooperation to provide access to properties and pertinent historical information is essential for success of the planned assessment activities. Access will be sought on private properties by meeting with owners, inviting owners to participate in redevelopment planning, working with owners to address concerns about liability and cost, and whenever possible, assisting them in identifying alternatives for reuse and financing.

D. Sustainable Reuse of Brownfields:

1) The commitment of the Central Prairie RC&D for proposed grant activities can best be described by their Purpose Statement on the RC&D website, "The purpose of the Resource Conservation and Development (RC&D) program is to accelerate the conservation, development and utilization of natural resources, improve the general level of economic activity, and to enhance the environment and standard of living in designated RC&D areas. It improves the capability of State, tribal and local units of government and local nonprofit organizations in rural areas to plan, develop and carry out programs for resource conservation and development. The program also establishes or improves coordination systems in rural areas. Current program objectives focus on improvement of quality of life achieved through natural resources conservation and community development which leads to sustainable communities, prudent use (development), and the management and conservation of natural resources. RC&D areas are locally sponsored areas designated by the Secretary of Agriculture for RC&D

technical and financial assistance program funds.” By addressing current conditions at potential Brownfields sites within the project area, future Brownfields will be prevented. The development plans can be made to reuse properties in such a manner as to improve the environment and reduce pollution and resource consumption. Simply by reuse of Brownfields property, KDHE is preventing the consumption of valuable greenspace – usually utilized for agriculture in this agriculturally-based state. Since potential petroleum Brownfields properties are often located along highway systems within affected communities, existing infrastructure is in place for redevelopment, eliminating the need to create new infrastructure.

Many rural communities within the grant area have active recycling programs. All counties within the project area have active Household Hazardous Waste disposal programs and recycling centers.

2) A portion of the purpose of the RC&D is to “improve the general level of economic activity” within the targeted communities. Since it is anticipated, primarily due to the RC&D’s communication with KDHE, most Brownfields properties to be assessed in the grant are abandoned properties, reuse of these properties will generate taxes for affected communities whereas before there was none. Reuse of these abandoned properties will provide jobs within the local communities as well as increase property values once properties have been updated to modern standards.

3) For many towns in Kansas, much of the commercial district is centered on primary highways running through the center of town. These corridors are often gateways to communities and the heart and soul of each small town. As highway traffic on these highways decreased through time smaller gas and service stations, often located at the entrance to a community, are left sitting idle. Lack of use has created eye sores at the entrances to many cities in Kansas. Reuse of these properties promotes a vibrant community.

E. Creation and/or Preservation of Greenspace/Open Space or Nonprofit Purpose):

Parks and open space can help promote an area in terms of economic vitality. The RC&D Council strives to preserve or create greenspace wherever possible. In illustration of this is a modern constructed wetland project completed by the RC&D. "Odin Store" is the site of Kansas' first modern constructed wetland. Revised from old designs, this rock-plant filter system in Odin, Kansas, is replacing field line septic outlets with a protective liner filled with wash gravel and hydric plants that absorb polluted water and nutrients while protecting ground water from the contaminants. This project is the catalyst for community wide systems. Wherever possible, green areas will be encouraged during redevelopment planning.

F. Pre-Award Community Notification:

1) KDHE has discussed the grant project with many members of the RC&D. A draft copy of this grant application is available on KDHE's Brownfields website. At the local level, copies of the application were made available at public libraries in the county seat of each county identified in this application. These documents were publicly available for review on October 2, 2007. The RC&D discussed this grant application at the August County Advisory Meetings held in Lyons, Rice County, on September 8, 2007; South Hutchinson, Reno County, on September 9, 2007; Stafford, Stafford County, on September 14, 2007; Barton County on September 15, 2007; Pawnee and Ellsworth Counties on September 16, 2007; Edwards County on September 29, 2007; and McPherson County on September 30, 2007. Four of the council leaders for the RC&D participated in the EPA sponsored brownfields grant training on September 2, 2007 in Salina, Kansas. The RC&D Council held their area meeting September 20th in Lyons, Rice County. During the Area Meeting the evening on September 20, 2007, the Brownfield Assessment Grant was an agenda item. The Council identified the grant as a major topic area for the Area Plan revision meetings in each County during January and February of 2008.

KDHE plans to attend either the January or February meeting of the RC&D to discuss specifics of the application. Throughout the grant, KDHE plans to provide local rural communities updates on the progress of the grant. Once award notification has been made, KDHE will begin to notify communities within the grant area of the funding award and, if requested, schedule a public meeting to discuss proposed activities under the grant.

2) Since many rural communities in Kansas still have a significant "fear of government", KDHE has discovered, through outreach efforts for the Brownfields program, that partnering with another entity at a more local level has been an excellent form of reaching citizens in the smaller communities. Often these local partners are in touch with key people within each town and can make introductions necessary to alleviate this fear. By communicating progress of this grant opportunity through the RC&D, KDHE has been able to put a local face on the project, reducing fear of "big government".

3) KDHE will make the initial comments period for the draft application approximately one week. Any comments received during the draft comment period will be considered upon completion of the final grant application. Once the grant application has been submitted in its final form, KDHE will make the application available for public viewing for an additional two week period. KDHE intends to issue a Press Release announcing the availability of the application for public viewing. KDHE also intends to participate in one RC&D meeting to discuss proposed activities in the plan.

4) KDHE will respond to all comments received in writing and make a copy of these responses available for viewing in the KDHE Brownfields Program website. All responses will be mailed to various entities including the individual who made comments on the plan, the RC&D, and any other entity who has shown interest in the project.

G. On-going Community Involvement:

1) Because KDHE is a governmental entity, all documents generated during the project are available for public viewing under the Kansas Open Records Act. Therefore, any member of the public can request information on the project at any time. KDHE plans to involve rural communities extensively during the site selection process. Based on community input, sites that are identified by community stakeholders will be assessed first. Once assessments have been completed, potential cleanup or reuse options for each project will be discussed with members of the community through stakeholders meetings.

2) KDHE already has an established relationship with the RC&D Council. KDHE also has established relationships with the City of McPherson, City of Inman, City of Lyons and the City of Great Bend through previous Brownfields Targeted Assessments conducted through the program. During the grant progress, KDHE intends to meet with representatives of rural communities within the grant area in the form of local meetings or by hosting one of KDHE's annual Brownfields workshops. An invitation to the workshop will be issued to representatives in these communities along with an informational flyer describing the grant. KDHE will encourage property owners to participate in the KDHE LUST Trust Fund or KDHE Voluntary Cleanup Program as sites enter the cleanup phase.

KDHE also plans to participate and communicate progress through the processes established for communicating with communities through the RC&D. There are usually at least three special scheduled meetings in each of the eight counties, involving presentations by the County Advisory Committees: The Conservation District's Annual Meetings, the County Commission Meetings, and special Public Input Meetings for listening to the public and embracing their priorities into the Central Prairie RC&D's five year long range planning effort.

3) As shown in the budget, KDHE has allowed for development of informational fact sheets to report the progress of the grant to citizens within each community. KDHE intends to make these fact sheets available in city and/or county offices. KDHE has also allowed for outreach events (most likely to occur during Tasks 4 and 5) to discuss results of the assessments and potential cleanup and/or property reuse options. KDHE is prepared to have all fact sheets translated, if necessary, for non-English speaking people.

4) The following organizations have agreed to support this grant and participate in decision making during the grant process.

Organization	Contact Person	Phone Number	General Responsibilities
Barton Conservation District	Pam Tucker	620-792-3002	County Chairperson
Edwards County/ Central Prairie RC&D	Stacy Neilson	620-659-3242	Council President
Ellsworth Conservation District	Pamela Hays	785-472-3161	District Manager
McPherson Conservation District	Ken Branch	785-906-0465	County Chairperson
Pawnee County	Kathy Bowman	620-285-6916	County Executive Director
Reno County	Curt Miller	620-459-6693	County Chairperson
Rice County	Ron Klein	620-257-3645	District Conservationist

Central Prairie RC&D	Dan Curtis	620-792-6224	Project Coordinator
Ellsworth County	Kenton Janzen	620-792-6224	County Chairman
City of Lyons	John Sweet	620-257-2320	City Administrator
Pawnee Co. Conservation Dist.	Jane Zook	620-285-2167	County Chairperson
West Wind Energy, LLC.	Dr. Scoot Brantley	620-793-5588	CEO/Owner

H. Reduction of Threats to Human Health and the Environment

1) The primary goal of the grant, beyond even the aesthetic, economic, and civic goals of Brownfield redevelopment, is to assess and remove public health and environmental threats that may linger from past releases of petroleum products. As previously discussed, with the development of the interstate highway system many previously utilized Kansas highways appear to have suffered from lack of use. Within the grant area, many gas stations that had depended on cross country travelers along US Highways 56 and 281 began to notice the financial ramifications as travelers began to utilize the more popular interstate system. Throughout the years, these gas stations began to disappear, leaving a legacy of abandoned property, often in prime central locations within many Kansas communities. According to the KDHE Underground Storage Tank (UST) database, there are currently the following number of identified USTs in each respective county: Barton County 167, Edwards County 37, McPherson County 115, Pawnee County 41, Reno County 238, Rice County 73, and Stafford County 43. Although many of these have been listed in the KDHE database, these only include UST sites that have been identified, these numbers often don't reflect releases from abandoned, unregistered gas stations.

Often it is only the identified and registered gasoline station sites that have been addressed, while the abandoned gas stations remain idle. Lack of economic development at these properties has not required potential property owners to undergo the All Appropriate Inquiry process – a process by which environmental contamination is often found. By assessing these sites, the true environmental condition of these properties can be established.

Typical contamination problems associated with abandoned gas stations in the State of Kansas include soil and ground water contamination of the BTEX (benzene, toluene, ethyl benzene, and xylenes) compounds. The United States Environmental Protection Agency states that benzene is found in the air from emissions from burning coal and oil, gasoline service stations, and motor vehicle exhaust. Acute (short-term) inhalation exposure of humans to benzene may cause drowsiness, dizziness, headaches, as well as eye, skin, and respiratory tract irritation, and, at high levels, unconsciousness. Chronic (long-term) inhalation exposure in occupational settings has caused various disorders in the blood, including reduced numbers of red blood cells and aplastic anemia, in occupational settings. Reproductive effects have been reported for women exposed by inhalation to high levels, and adverse effects on the developing fetus have been observed in animal tests. Increased incidence of leukemia (cancer of the tissues that form white blood cells) have been observed in humans occupationally exposed to benzene. EPA has classified benzene as a Group A human carcinogen.

Toluene is added to gasoline, used to produce benzene, and used as a solvent. Exposure to toluene may occur from breathing ambient or indoor air. The central nervous system (CNS) is the primary target organ for toluene toxicity in both humans and animals for acute (short-term) and chronic (long-term) exposures. CNS dysfunction and narcosis have been frequently observed in humans acutely exposed to toluene by inhalation; symptoms include fatigue, sleepiness, headaches, and nausea. CNS depression has been reported to occur in chronic abusers exposed to high levels of toluene. Chronic inhalation exposure of humans to toluene also causes irritation of the upper respiratory tract and eyes, sore throat, dizziness, and headache. Human studies have reported developmental effects, such as CNS dysfunction, attention deficits, and minor craniofacial and limb anomalies, in the children of pregnant women exposed to toluene or mixed solvents by inhalation. Reproductive effects, including an association between exposure to toluene and an increased incidence of spontaneous abortions, have also been noted. However, these studies are not conclusive due to many confounding variables. EPA has classified toluene as a Group D, not classifiable as to human carcinogenicity.

Commercial or mixed xylene usually contains about 40-65% *m*-xylene and up to 20% each of *o*-xylene and *p*-xylene and ethylbenzene. Xylenes are released into the atmosphere as fugitive emissions from industrial sources, from auto exhaust, and through volatilization from their use as solvents. Acute (short-term) inhalation exposure to mixed xylenes in humans results in irritation of the eyes, nose, and throat, gastrointestinal effects, eye irritation, and neurological effects. Chronic (long-term) inhalation exposure of humans to mixed xylenes results primarily in central nervous system (CNS) effects, such as headache, dizziness, fatigue, tremors, and incoordination; respiratory, cardiovascular, and kidney effects have also been reported. EPA has classified mixed xylenes as a Group D, not classifiable as to human carcinogenicity.

During the Phase I Assessment, environmental concerns for each property will be identified. Environmental risks will be characterized during the evaluation and assessment process, while sites that pose the most risk will be given priority to be fully characterized and remediated. To fully assess all potential environmental risks during the site characterization, an EPA-approved Sampling and Analysis Plan, Quality Assurance Project Plan, and Health and Safety Plan will be developed and utilized. All Phase II Assessments will attempt to verify the existence of any perceived threats and to determine the type and extent of any contamination. For eligible properties, Phase II assessments which identify petroleum contaminants will develop a site conceptual model of potential exposures using ASTM E1689-95(2003). Phase II reports will make comparisons to risk-based levels of protection for soil and ground water and discuss specific petroleum contaminants above these levels, including public health summaries from the Agency for Toxic Substance and Disease Registry. In addition to chemical characterization, Phase II reports could include considerations for redevelopment such as construction worker protections, risk management practices, and interim land stewardship prior to redevelopment.

KDHE will encourage projects requiring cleanup to be enrolled in the Kansas Voluntary Cleanup and Property Redevelopment program (VCPRP) or in the State Underground

Storage Tank Trust Fund, as appropriate. For both programs, KDHE's project manager will oversee the planning and cleanup phases of the project. Contamination through all media will be addressed. All planned cleanups will be engineered and implemented according to the Risk Based Standards for Kansas for the intended end-use. If necessary, institutional controls will be placed on impacted properties during cleanup activities and enrolled in KDHE's Environmental Use Controls (EUC) program. Protection from exposure to hazardous substances, pollutants, contaminants, and/or petroleum will be evaluated for the sensitive populations including children and women of childbearing age due to the close proximity of Brownfields properties in residential neighborhoods. Throughout the project, careful consideration of potential health risks to residents will be given. If specific hazardous substances are identified through the assessment activity, KDHE will share data with health officials to discuss human health concerns, including the local Health Departments.

2) The Central Prairie RC&D has engaged the state in the most direct manner possible by asking KDHE to manage and implement assessments. If Phase I and/or Phase II Assessments determine the property has not been impacted by petroleum contaminants, the grant assessment manager will be able to immediately and directly write a Brownfields Assessment Determination indicating no further action is necessary at the property. Sites with identified contamination would be managed by KDHE's LUST Trust Fund or the VCPRP. Typically, further assessment is necessary prior to development of the Voluntary Cleanup Plan. However, it is anticipated that Phase II Assessment activities will adequately characterize environmental impacts and further assessment activities will not be required once these properties enter the VCP. Cleanup actions conducted under the VCPRP are driven by comparison of environmental impacts to KDHE's RSK numbers. These RSK values account for future residential and non-residential land use scenarios.

I. Leveraging of Additional Resources

1) As stated previously, the targeted rural communities have accessed KDHE's Brownfields Targeted Assessment Program to utilize funding available to conduct Phase I and Phase II activities within project areas. KDHE has provided over \$40,000 in assessments for these areas. An additional illustration of the RC&D's commitment to leverage resources within the community can be shown through the efforts taken throughout the RC&D counties. In all RC&D has brought into the region nearly a million dollars in federal assets with the Memorandum marrying the Council to USDA's Natural Resource Conservation Service. Over two hundred projects, some large, some small, some involving significant time from Council members and some simple coordination. For the first three years Barton, Edwards, McPherson, Pawnee, Reno, Rice, and Stafford Counties have contributed \$16,800 in dues and with Ellsworth's annexation into the Council Area in 2004 another \$6,400 has brought the non-federal dues total to \$23,200 over the council's history.

Thousands of dollars are being saved in Edwards County with recycling efforts moving forward. Over 4500 bicycles have been moved to Ellsworth Correctional Facility where inmate repair efforts have put 3800 bicycles back out to needy kids. Not just kids in

central Kansas, but with the help of sister RC&D Councils throughout Kansas, five other states, and even some going overseas where a smile is priceless. The Council initiated a mature process for the Wildlife Feeding the Hungry Program where deer meat is donated and processed with no delays, so that the less fortunate can have meals. Last year this program resulted in over 1000 pounds of deer meat in one county. This year by searching out and making agreements, the RC&D is on a pace right now to place a couple of tons of deer meat on the tables of the needy. The RC&D has assisted in the development of recycling, tourism, historical reenactments, trail rides, grant building training, theater restoration, outdoor classrooms, and economic development.

Another key area of assistance to rural Kansas is RC&D's leadership in establishing constructed wetland demonstrations to exhibit protection from ground water contamination from conventional on-site waste water treatment systems in rural areas. The Council has also worked very hard to get a \$164,000 KDHE grant to establish an engineering study directing the Council to phase III. Phase III of the plan will see the installation of constructed wetland cells that will lead the Council to assist in building more constructed wetland in Odin. The Council has assisted in the establishment of two more constructed wetland demonstrations and has about five pending on the future workload.

For the Rice County Community Center the Council was able to assist in the construction of a 20,000 square foot building completed in 2007 with a cost of over a \$500,000, primarily from tax credits over two previous years in excess of \$300,000 each. The building provides meeting rooms, a full-service kitchen, and a large community room. The enclosed arena building will offer 4-H facilities and a place for Reins of Hope therapeutic activities. Nature trails, lighted sidewalks entwined with plants, benches, and trees have been in use by area residents.

2) Projects in which Central Prairie RC&D Council has partnered in or has directly received grants, cash or material donations since 2004 include:

Project:	Funding Source:	Amount Leveraged:
Odin Engineering Study	KDHE-EPA	\$162,000.00
Frank Klaus Filter System	State Cons. Comm.	\$4,500.00
Upland Gamebird Habitat Enhance '05	Ks Wildlife & Parks	\$17,000.00
Upland Gamebird Habitat Enhance '06	Ks Wildlife & Parks	\$37,000.00
Small Business Development	State Agencies	\$24,000.00
Pretty Prairie Community Found.	Cash Donations	\$50,000.00
South Hutch Salt Fest '06	Cash Donations	\$55,000.00
Clafin Playground	Grants/Donations	\$70,000.00
St. Jo Fire Station	Reno Co./Ks. Dept Comm	\$70,000.00
Fire Safety Education Trailer	Ks Forest Service	\$55,000.00
Four Master Fire Plans	Ks Forest Service	\$20,000.00
St. John Pride	Donations/Fundraising	\$132,000.00
Edwards County Recycling	KDHE-Solid Waste Grants	\$56,000.00
Wildlife Feeding the Hungry'06-'07	Donations	\$24,000.00
Camp Pawnee	County/State	\$12,000.00

Larned Outdoor Classroom & Rec area	Donations/local mini-grants	\$32,500.00
Pretty Prairie Theater	Donations/local mini-grants	\$36,500.00
Stafford Mainstreet Rehabilitation	Dept of Commerce/Trans	\$35,000.00
Weyrich Playground Area	Grants/Donations	\$17,500.00
Kinsley Community Theater	Donations	\$45,000.00
Ethanol Feasibility Study	Dep. of Commerce	\$75,000.00
BioDiesel Feasibility Study	Dep. of Commerce	\$42,000.00
Smokey Hill Wraps	KDHE-EPA	\$35,000.00
Upland Gamebird Habitat Enhance '07	Ks. Wildlife & Parks	\$78,500.00
West Wind Energy	Donations	\$50,000.00
Stafford Chamber of Commerce Office	Cash Donations	\$16,000.00
South Hutch Salt Fest '07	Cash Donations	\$75,000.00

J. Programmatic Capability

1) KDHE possesses sufficient capabilities and experience to manage all assessment activities that would be conducted if awarded an assessment grant. KDHE successfully managed a Brownfields Targeted Assessment (BTA) grant from 1998-2004. KDHE has also managed the EPA-awarded State Response Grant since 2003. KDHE has an established system to track and report grant activities on all EPA grants. KDHE has staff consisting of geologists, environmental scientists, environmental technicians, attorneys, and engineers that are experienced in environmental investigations and cleanup activities. KDHE has demonstrated that KDHE's contractors are adequate, qualified, and trained environmental consulting firms hired to perform sampling and investigatory procedures. These consulting firms were acquired according to federal procurement procedures.

2) KDHE/BER's Remedial Section has managed several EPA grants. Current EPA grants managed within the section include: the Superfund Consolidated Grant (\$770,160) that currently includes Core, Pre-NPL, and Management Assistance Grants; and the State Response Grant (\$5,056,270). Historically, KDHE/BER has managed the Brownfields Targeted Assessments (\$1,441,000) and Enforcement Negotiation Grant, (\$383,000).

KDHE maintains an Accounting Services department which oversees all of KDHE's accounting requirements. Accounting Services tracks the expenses of all the Federal Programs implemented by KDHE and reports these on a quarterly basis to EPA. KDHE will report all activities and expenditures regarding the implementation of the assessment grant to EPA on a quarterly basis. All fund management for the Brownfields program is currently managed pursuant to procedures outlined in 40 CFR Part 35 Subpart O. KDHE will follow these same procedures to manage funds for an assessment grant. As with other EPA funded programs within KDHE, KDHE will utilize the Automated Clearing House Electronic Funds Transfer (ACH/EFT) system to obtain funds from EPA. KDHE has not had any adverse audit findings from an OMB Circular A-133 audit.

Financial staff have extensive experience in the financial management of other grant programs such as: Underground Storage Tanks, Leaking Underground Storage Tanks, Formerly Used Defense Sites, Defense/State Memorandum of Agreement, Abandoned Mine Lands, and Administration and Enforcement of Mine Lands. In addition, financial staff occasionally provide assistance to other organizational units within the agency with

the financial budgeting, tracking, reporting of other environmental programs in the Bureau of Waste Management, Bureau of Water, and the Bureau of Air and Radiation, and multi-million dollar health grants.

In addition to federal grant programs, Bureau staff have extensive experience in managing state programs such as the State Water Plan program, the State Cooperative program, the State Voluntary Cleanup program, the Drycleaner Trust Fund program, the Above Ground and Underground tank programs, the Landfill remediation program, the Emergency Response program, the Clandestine Drug Lab program, the Environmental Use Control program, and Natural Resource Damages program. The current year Bureau budget for State programs totals in excess \$25 million.

3) KDHE has been a recipient of EPA Brownfields Cooperative Agreement #BF98726202-02. KDHE has complied with requisite reports and reporting measures through the period of grant and closeout.

4) KDHE was awarded a Brownfields Revolving Loan Fund grant in 2002. Of the \$1 million that was awarded to KDHE, approximately \$3,670 were expended establishing the program. KDHE's Brownfields Cleanup Revolving Loan and Grant Fund (BCRLGF) grant was transitioned under the new Brownfields Law in the first quarter of federal fiscal year 2005. KDHE made the decision to transition to provide opportunities for loan applicants for sub grants under the rules of the new Brownfields Law.

Four separate cost accounts have been established to manage the BCRLGF program. The initial account was established for funds deposited prior to making BCRLGF loans. An administrative account was established to track administrative costs associated with the BCRLGF. A loan repayment and principal account was established to track all loan principal repayments. The final account established is the loan interest account necessary to track all interest made on loans as well as all loan-processing fees.

Program guidelines and an application have been developed for potential applicants. However, KDHE was unsuccessful at obtaining municipalities to utilize the program. At EPA's suggestion, KDHE was in the process of returning these funds to EPA in October 2005. In 2007 KDHE received an application from the City of Leavenworth to utilize this funding source. To date, KDHE has received one BCRLGF application and is in the process of reviewing the application.

5) As stated above, KDHE was in the process of returning funds associated with the Revolving Loan Fund until an application from the City of Leavenworth was received in 2007. This application is in the process of being reviewed by KDHE. KDHE funds expended for the BCRLGF project have been limited to program development activities, outreach to potential borrowers, and the development of loan guidance documents.