



Charles D. Baker, Governor
Karyn E. Polito, Lieutenant Governor
Stephanie Pollack, MassDOT Secretary & CEO
Brian Shortsleeve, Chief Administrator and Acting General Manager



December 6, 2016

Environmental Protection Agency
Office of Brownfields and Land Revitalization
Mail Code 5105 T
1200 Pennsylvania Ave. NW
Washington, DC 20460

**Re: DRAFT Proposal for FY 2016 Brownfields Site-Specific Cleanup Grant
Ball Square Station Site (five parcels)
Broadway and Boston Avenue
Somerville and Medford, Massachusetts**

The MBTA has acquired five contiguous parcels in Ball Square on the border of Medford and Somerville, Massachusetts with the plans to develop a new light rail station along the proposed Green Line Extension (GLX) project. The 4.3-mile extension is intended to improve mobility and regional access for residents in the densely populated municipalities of Somerville and Medford, two cities currently underserved by the MBTA relative to their population densities, commercial importance, and proximity to Boston.

These parcels have over 100 years of commercial and industrial history, including such uses as a railroad station, coal storage facility, automobile and motorcycle repair shops, and even a bowling alley. These types of commercial and light industrial uses are typical in Ball Square, which has lagged behind other “urban villages” in Somerville like Davis Square that have enjoyed the benefits of access to light rail transit.

a. Applicant Identification

Massachusetts Bay Transportation Authority
10 Park Plaza
Boston, MA 02116

b. DUNS Number: 176621

c. Funding Requested:

- i. Grant Type: Cleanup
- ii. Federal Funds Requested: \$200,000. No cost share waiver is requested.
- iii. Contamination: Hazardous Substances
- iv. Site-Specific

d. Location:

City of Somerville and City of Medford, Middlesex County, Massachusetts



e. Property information:

- 0 Boston Ave, Somerville, MA/Off Broadway, Medford, MA, 02144
- 675 Broadway, Somerville, MA/0 Broadway, Medford, MA, 02144
- 662 Boston Ave, Medford, MA/664 Boston Ave, Somerville, MA, 02155
- 646 Boston Ave, Medford, MA, 02155
- 642 Boston Ave, Medford, MA, 02155

f. Contacts:

i. Project Director:

Andrew D. Brennan
Director of Environmental Affairs
Massachusetts Bay Transportation Authority
10 Park Plaza, Boston, Massachusetts 02116
Phone: 617-222-3126
Email: ABrennan@MBTA.com

ii. Chief Executive:

Stephanie Pollack

g. Date Submitted: December 20, 2016

h. Project Period: 18-24 Months

i. Population: The population of Medford is 56,173 and the population of Somerville is 78,901. The population of the Ball Square Census Tract is 5,568. The MBTA Service District population is estimated as 4,663,565.

j. Regional Priorities Form/Other Factors Checklist: Please see attached.

The MBTA is excited about the opportunity that this grant will provide to our organization and our community, which includes the ridership of our regional transit system and revitalization of the Cities of Somerville and Medford.

Sincerely,

Brian Shortsleeve
Chief Administrator &
Acting General Manager

CC: Frank Gardner, Regional Brownfields Coordinator, EPA Region 1

MASSACHUSETTS BAY TRANSPORTATION AUTHORITY
US ENVIRONMENTAL PROTECTION AGENCY
SITE-SPECIFIC CLEANUP GRANT PROPOSAL
BALL SQUARE STATION SITE
December 6, 2016

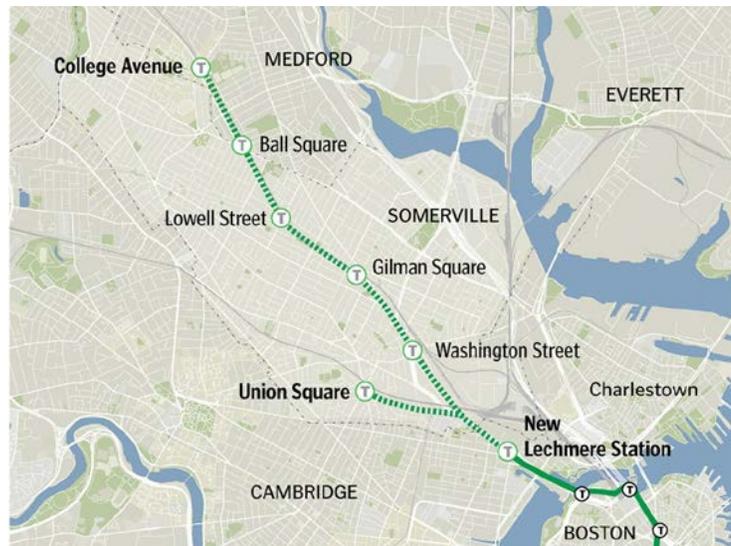
The Green Line Extension (GLX) Ball Square Station project is located at the intersection of Boston Avenue and Broadway in Somerville and Medford, Massachusetts (the Site). The Site includes five contiguous industrial parcels that have been acquired by the Massachusetts Bay Transportation Authority (MBTA) for redevelopment to support a planned 4.3-mile extension of their rapid transit system through Somerville and Medford.

1. Community Need

a. Targeted Community and Brownfields

- i. Targeted Community Description: Ball Square is a neighborhood primarily in Somerville, Massachusetts, but also extending into Medford, at the intersection of Boston Avenue and Broadway. The area is currently mostly residential with commercial and light industrial businesses located along Broadway. This area is located adjacent to the lower income areas of East Somerville and Everett. This area also lacks access to rapid transit. For these reasons, the Ball Square area business economy and real estate market have lagged behind other neighborhoods in Somerville such as Davis Square and Porter Square.

The proposed cleanup activities will include the remediation of former and current commercial/industrial properties, including automobile repair shops. The properties will be redeveloped as a light rail train station as part of a new rail line (the Green Line Extension or GLX). The GLX rail line will connect Ball Square with the rest of Greater Boston via the fourth largest rapid transit system in the U.S. This project is expected to attract redevelopment and drive the local economy and real estate market.



ii. Demographic Information:

	Ball Square Area (Census Tract 3504)	Somerville	Massachusetts	National	Davis Square (Census Tract 3508)
Population	5,568 ²	78,901 ¹	6,745,408 ¹	318,857,056 ¹	2,046 ²
Unemployment	5.9% ²	5.3% ²	6.0% ²	6.0% ²	5.5% ²
Poverty Rate:	11.0% ²	14.8% ²	11.4% ²	15.4% ²	8.4% ²
Percent Minority:	11.85% ²	26.1% ³	19.6% ³	22.6% ³	22.04% ²
Median Household Income:	\$80,091 ²	\$67,118 ²	\$66,866 ²	\$53,046 ²	\$94,531 ²
Use of Public Transportation to Work	33.2% ²	31.0% ²	9.3% ²	5.0% ²	48.6% ²
Drove to Work	47.1% ²	50.0% ²	80.0% ²	86.1% ²	36.9% ²
¹ Data are from the 2014 US Census Population Estimate available on American FactFinder at http://factfinder.census.gov/faces/nav/jsf/pages/community_facts.xhtml ² Data are from the 2009-2013 American Community Survey 5-year Estimates US Census data available on American FactFinder at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?src=CF ³ Data are from the USA State and County QuickFacts available on United States Census Bureau http://quickfacts.census.gov/qfd/states/00000.html?cssp=SERP					

The table above summarizes the demographic information for the Ball Square Census Tract as compared to the rest of the City, State, and Country. In addition, to provide a better apples-to-apples comparison, the Census Tract information for Davis Square is provided. As demonstrated above, Ball Square has a higher unemployment rate, a higher poverty rate, and a lower median household income than Davis Square. In addition, only about 33% of Ball Square residents rely on public transportation to get to work, while Davis Square residents use of public transportation is significantly higher at approximately 50%.

iii. Description of Brownfields

The five parcels have over 100 years of commercial and industrial use. The 0 Boston Avenue and 675 Broadway parcels were reportedly used as a railroad station from approximately 1910 to at least 1971. The 662-664 Boston Avenue parcel was most recently used as an automobile repair facility and there are reports of an underground storage tank (UST) at the property. The 642 and 646 Boston Avenue parcels have operated as motorcycle and/or automobile repair facilities since approximately 1930, and were reportedly a coal storage garage in approximately 1911.

The historical use of the Site has resulted in petroleum and hazardous substance contamination of soil and groundwater.

iv. Cumulative Environmental Issues

This area of Somerville and Medford was historically filled tidal lands. The material used to fill this land typically contained lead and polycyclic aromatic hydrocarbons (PAHs) as well as other metals and contaminants. Although this fill material is widespread and can be considered background, this fill material needs to be managed during redevelopment projects to mitigate risk exposure.

b. Impacts on Targeted Community

The historical commercial and industrial use (and the real and perceived contamination) of these brownfield properties have limited the redevelopment of this area. The shallow historical fill material typically limits the use of these areas to commercial and industrial. Significant remediation is typically required to reuse the properties as mixed-use residential or other uses with high-frequency and high-intensity use by children (i.e. yards, schools and playgrounds).

As discussed in section 1.a.ii. the demographics of this area are generally more economically depressed than a comparable neighborhood (Davis Square) located in a more upland area that has less brownfield impacts.

c. Financial Need

i. Economic Conditions:

While GLX was first planned in 1990, the project has proceeded in fits and starts. Construction finally broke ground in 2012, with service targeted to begin in 2020. In August 2015, the MBTA disclosed that the project would cost approximately \$3 billion, a \$1.08 billion increase from previous estimates. These increased costs were related to several factors, including; increased construction costs and the acquisition and remediation of redevelopment properties. Since that time, the MBTA has considered scaling back the project to meet budget constraints. The possible cuts include reducing the size of stations and reducing other ancillary benefits, such as a planned extension of the Somerville Community Path.

The MBTA is seeking this brownfields funding (as well as other sources of funding) in an effort to maintain the scope of the GLX project. Specifically, these funds will be used to remediate the 5 parcels acquired for the Ball Square Station. Savings to the overall project budget could be applied to the Community Path and/or other community benefits.

ii. Economic Effects of Brownfields:

The economic development of Ball Square has lagged behind other neighbors in Somerville, such as Davis Square. One of the reasons that Ball Square has not prospered is the historical use of the area as a rail yard and the real and perceived (stigma) of contaminated properties. One of the reasons that Davis Square has prospered is that the MBTA Red Line station was built in this neighborhood in 1983.

As demonstrated in the demographic table above, Ball Square has a higher unemployment rate, a higher poverty rate, and a lower median household income than

Davis Square. The remediation and redevelopment of the brownfields parcels in Ball Square would likely improve the economy of this area including: decreasing unemployment; decreasing poverty; increasing household median income, and; increasing property values.

2. Project Description and Feasibility of Success

a. Project Description

- i. Existing Conditions: The MBTA has acquired five contiguous parcels totaling 39,429 square feet in Ball Square on the border of Medford and Somerville, Massachusetts (the Site). These properties were acquired for the purposes of developing a new light rail station as part of the MBTA GLX Project. The Site is a triangular property located at the intersection of Boston Avenue and Broadway. These Site parcels have over 100 years of commercial and industrial history, including such uses as a railroad station, coal storage facility, and automobile and motorcycle repair shops. Descriptions of each parcel, including most recent use and existing buildings, are detailed below:

Parcel 1: 0 Boston Ave, Somerville and Off Broadway, Medford

Parcel 1 is a 3,250 sf parcel located on the northeastern portion of the Site along the former railroad right-of-way. This parcel is currently vacant (a slab foundation remains) but was formerly used for the North Somerville Railroad Station. Only limited surface sampling has been performed at this parcel, specifically, one soil sample. Although reportable concentrations of petroleum and hazardous substances were not detected in the sample, there is a high likelihood of impacted subsurface soil at Parcel 1 as a result of automotive service facilities and gasoline stations with petroleum storage that have historically been located to the southeast and northwest of the parcel.

Parcel 2: 675 Broadway, Somerville, 0 Broadway, Medford

Parcel 2 is an 11,546 sf triangular parcel located on the eastern portion of the Site along Broadway. This parcel is currently improved by a one-story concrete foundation, wood frame, office-type building located on the western portion of the parcel. This building was reportedly most recently used by a veterinary practice and by Sako Auto Body for storage of auto parts and miscellaneous items. The building was constructed in approximately 1910 and was formerly used for the North Somerville Railroad Station and a restaurant. A limited subsurface sampling program was performed as part of an ASTM Phase II investigation at this parcel in 2011 to support the acquisition of the parcel by the MBTA. This program included the advancement of four soil borings and the installation of four monitoring wells. Nickel and polycyclic aromatic hydrocarbons (PAHs) were detected in soil at concentrations above the reportable concentrations. Groundwater analysis did not identify contaminants above the applicable reporting thresholds. The MBTA acquired the property on March 22, 2014. As the property owner, the MBTA notified the Massachusetts Department of Environmental Protection (MassDEP) of the

reportable conditions on July 10, 2015. Release Tracking Number (RTN) 3-32975 was assigned to the release. The notification linked this release to a Special Project Designation (SPD) RTN (3-30620) that covers multiple MCP release sites along the GLX project.

Parcel 3: 662 Boston Avenue, Medford, 664 Boston Avenue, Somerville

Parcel 3 is a 12,449 sf parcel located on the central portion of the Site along Boston Avenue. This parcel is occupied by two commercial operations located in two adjacent buildings. Ball Square Auto Repair is located on the parcel with an address of 664 Boston Avenue. A bowling alley is located on the parcel at 662 Boston Avenue. The parcel has been developed since 1910, although the historical uses are not known at this time. The businesses are in the process of being relocated. A UST was reportedly located at the 664 Boston Avenue property as early as 1934; however, no closure documentation regarding this UST was identified. Four soil borings and monitoring wells were advanced at the parcel as part of ASTM Phase II activities conducted to support the GLX project. Nickel, lead, chromium and PAHs were detected in soil at concentrations above reporting thresholds. Groundwater analyses identified dissolved lead and C5-C8 aliphatics above applicable reporting thresholds. In addition to the subsurface soil and groundwater issues, a heating oil UST was identified at the bowling alley and several hydraulic lifts and vaults were located at the former automobile repair operations. These will need to be remediated as part of Site cleanup. The MassDEP was notified of these concentrations on July 10, 2015 and RTN 3-32975 was also assigned to this release along with the release notification for 675 Broadway.

Parcels 4/5: 642-646 Boston Avenue, Medford, MA

Parcels 4 and 5 are 8,991 sf and 3,193 sf, respectively. These parcels are occupied by a one-story brick building and a one-story concrete building. These buildings were formerly occupied by an automotive body repair and painting shop. The property has operated as an automotive repair shop and/or sales business since at least 1930 and was reportedly a garage for a coal company circa 1911. An AST and a floor drain (reportedly connected to an oil/water separator) were identified at the property. No environmental sampling has been conducted at the property as part of the GLX Project. However, given the current and historical use of the property, there is a high likelihood of petroleum contamination at Parcels 4 and 5.

The cleanup of these five parcels will make possible the redevelopment of the property as a Ball Square light rail station as part of the GLX Project. The new station at Ball Square will provide fast, reliable, and affordable transportation for area residents to get to work and other places. The train station will also lead to the revitalization of the area with new planned Transit Oriented Development (TOD) projects. These TOD projects provide the extended benefit of a sustainable work, live, and play community that is interconnected to other communities. Additional benefits of a TOD project typically include improved quality of life and increased economic vitality and jobs. New light rail service will also

provide direct environmental benefits by reducing the number of buses and cars on the road. In addition, the Ball Square station design is integrated into the planned Somerville Community Path to facilitate additional use of non-automobile travel through coordination of transit and bicycle pedestrian facilities.

The MBTA will work with our local, state, and federal partners to clean-up the Site and redevelop a light rail station that will revitalize the center of Ball Square. These partners include the Massachusetts Department of Environmental Protection (MassDEP) and the U.S. Environmental Protection Agency (USEPA). The MBTA will also competitively select strategic consultants and contractors, including a Massachusetts Licensed Site Professional (LSP), to manage and oversee the clean-up efforts.

ii. Proposed Cleanup Plan:

The proposed Site cleanup will include a coordinated and comprehensive assessment and removal of ASTs, USTs, other petroleum-filled equipment (i.e. hydraulic lifts and oil/water separators) and related contaminated soil across all five parcels. The cleanup will also involve the removal of contaminated fill material to support the installation of subsurface foundations, piles, and/or utilities.

As initial remediation activities, an inventory of ASTs and other aboveground petroleum-filled equipment will be performed by the MBTA and their team. This equipment will be removed and properly disposed of offsite. The removal will include the assessment of environmental media and removal of impacted soil in the area of the equipment.

To address subsurface impacts, a Site-wide ground-penetrating radar (GPR) assessment will confirm the location of suspected USTs and other subsurface structures. A comprehensive subsurface drilling program will identify the lateral and vertical extents of related soil and groundwater contamination. The data from these assessments will be used to prepare a targeted UST removal and soil excavation plan. The removal of UST(s) and excavation of soils will be performed under applicable state (MassDEP) and local (Fire Department) permit approvals.

In addition to the UST removal, the characterization and removal of contaminated fill will be performed during the subsurface excavation to support redevelopment activities. The contaminated fill will be excavated to a depth of approximately 3-feet in future landscaped areas that may pose risk exposure to adults and children at the future train station.

During the excavation activities, institutional controls such as dust suppression and temporary fencing will be used to protect the public. Residual contamination in soil and groundwater will be managed under the Massachusetts Contingency Plan (MCP) and may include the placement of clean soil, pavement, and/or a vapor barrier to reduce future exposure. In addition, an activity and use limitation (AUL) property deed restriction will be required to maintain the conditions of limiting exposure to residual impacted soils in the future.

b. Task Descriptions and Budget Table

i. Task Description:

Task 1: Program Management, Planning and Design: Includes costs for the planning, engineering, design, procurement and oversight of cleanup activities as well as programmatic management of the grant. The budget of this task is broken down as follows:

- \$2,000 for programmatic management of the grant, including reporting.
- \$25,000 for the planning, design, and procurement support of the cleanup activities.
- \$15,000 for oversight and documentation of cleanup activities and reporting.

Task 2: Community Involvement: Includes the development of a Community Relations Plan (CRP) and refining an Analysis of Brownfields Cleanup Alternatives (ABCA), submitting a Quality Assurance Project Plan (QAPP) and preparing and submitting an MCP RAM Plan to the MassDEP. The budget for this task breaks down as follows:

- \$17,000 for preparation of the ABCA, CRP, QAPP, and RAM Plan.
- \$3,000 for the advertising and attending public meetings

The deliverables for this task include the final ABCA, CRP, QAPP, and RAM Plan.

Task 3: Cleanup Activities: The initial cleanup activities will include the GPR survey of the undeveloped portions of the five parcels to identify/confirm the location of USTs and other subsurface structures. In addition to the GPR survey, a subsurface drilling program will be performed to evaluate the nature and extent of contamination in support of the remedial planning and design. The cleanup activities will also include the assessment and removal of the aboveground petroleum-filled equipment including the heating oil AST, the hydraulic lifts, and the oil/water separator(s). The excavation of USTs and related petroleum-impacted soils will also be included in this task. Post-excavation confirmatory sampling will be performed to document the results of the cleanup. The budget breakdown for this task includes the following:

- \$25,000 for GPR survey and pre-characterization program
- \$35,000 for removal of aboveground petroleum-filled equipment
- \$50,000 for excavation of USTs and petroleum-impacted soil, including confirmatory sampling and analytical testing
- \$50,000 for targeted excavation of impacted-fill material to support development

Deliverables for this task include the UST closure permits, waste disposal manifests, and laboratory reports. These documents will be included in the final reports prepared in Task 4.

Task 4: Coordination and Final Reporting: Includes consultant costs for ongoing coordination with the EPA Brownfields Program and the MassDEP. Subtask includes communications, submittal of status reports, and remediation summary report (RAM Completion Report). A Permanent Solution Statement Report will also be prepared to

close out the Site under the MassDEP MCP Program. The costs associated with this task are budgeted as \$30,000. The AUL deed restriction including a land survey of the AUL limits will be an additional \$20,000.

ii. Budget Table:

Budget Categories	Project Tasks (\$)				
	Task 1	Task 2	Task 3	Task 4	Total
Personnel	\$3,000	\$2,000	\$4,000	\$1,000	\$10,000
Fringe Benefits					
Travel ¹	\$500		\$1,000		\$1,500
Equipment ²					
Supplies	\$1,000		\$2,000		\$3,000
Contractual	\$37,500	\$17,000	\$153,000	\$49,000	\$256,500
Other (Specify)					
Total Federal Funding (not to exceed \$200,000)	\$32,000	\$15,000	\$115,000	\$38,000	\$200,000
Cost Share ³	\$10,000	\$4,000	\$45,000	\$12,000	\$71,000
Total Budget	\$42,000	\$19,000	\$160,000	\$50,000	\$271,000
¹ Travel to brownfields-related training conferences is an acceptable use of these grant funds. ² EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies. Generally, equipment is not required for grants. ³ Applicants must include the cost share in the budget even if applying for a cost share waiver. If the applicant is successful and the cost share waiver is approved, it will be removed in pre-award negotiation.					

c. **Ability to Leverage**

The current cost estimate for the GLX project is \$2.3 billion. In January 2015, the Federal Transit Administration issued a Full Funding Grant Agreement (FFGA) in which it agreed to pay \$996 million toward the project. The balance of the costs will be paid by a combination of sources:

- \$158 million in federal highway funds (via the CMAQ program)
- \$75 million from the cities of Cambridge and Somerville
- Available grants and funds (like this brownfield cleanup grant); and
- the balance from Commonwealth Revenue Bonds, provided to the MBTA via MassDOT.

3. **Community Engagement and Partnerships**

The MBTA has a dedicated website for the GLX project (<http://greenlineextension.org>) in order to keep the community engaged and informed. In addition to the website, the MBTA holds regular public meetings to inform the community and solicit feedback and comments. The MBTA is working closely with the Cities of Somerville and Medford in partnership to develop this important project.

a. Plan for Involving Targeted Community & Other Stakeholders; and Communicating Project Progress

As discussed above, the MBTA has already setup a structure for engaging stakeholders and communicating GLX project updates, including; a website, email distribution lists, and regular public meetings. The MBTA proposes to communicate brownfield project updates through this existing structure. Specifically, MBTA will use the public meeting forum to seek out and consider concerns that local residents may have with regard to health, safety, and community disruption potentially posed by the proposed cleanup activities. By soliciting public comments and stakeholder feedback, the MBTA can ensure that the proposed cleanup activities are conducted in a manner that is protective of sensitive populations and nearby residents.

b. Partnerships with Government Agencies

The MassDEP is the state agency that will regulate the remediation of the Site under the Massachusetts Contingency Plan (MCP) regulations. The MCP relies on a privatized Licensed Site Professional (LSP) program to remediate sites similar to the Ball Square Station parcels. The required Release Abatement Measure (RAM) Plan will be prepared to meet the requirements of the MCP and to be protective of human-health and the environment. The MBTA will provide regular updates to the Cities of Somerville and Medford during the remediation of these properties. In certain cases where the property involves a City-owned property, the City will be engaged during the remediation activities.

c. Partnerships with Community Organizations

- i. Community Organization Description & Role: The MBTA is working closely with the Cities of Somerville and Medford on the GLX Project and the brownfields cleanup and redevelopment efforts will be part of the coordination.
- ii. Letters of Commitment: Attached are commitment letters from the Cities of Somerville and Medford in support of the MBTA GLX Ball Square Station brownfield cleanup grant proposal. These letters should discuss their support for the project, and describe and affirm their roles and commitments to the planning and implementation of the project. More broadly, these municipalities recognize the benefits of the GLX project that will bring to their communities, including improved public transportation and new investment in the form of mixed-use redevelopment.

4. Project Benefits

a. Health and/or Welfare and Environmental Benefits

- i. Health and/or Welfare Benefits: The cleanup and redevelopment in Ball Square will provide a reduction in potential exposure to Site soil contamination, which includes

carcinogens. These protections will be provided long-term with the application of a land use deed restriction (AUL). As discussed below in Section 4.b.i., the redevelopment as a light rail train station and community path will have the additional health benefits of a more walkable community and less automobiles on the road.

- ii. Environmental Benefits: The cleanup and redevelopment in Ball Square will reduce the existing and potential soil contamination resulting from over 100 years of commercial and industrial use. By removing USTs and contaminated soil, the existing and potential groundwater contamination will be mitigated, thereby limiting the potential migration of contamination offsite.

b. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse

Policies, Planning, and Other Tools: The MBTA is working closely with the municipalities to foster and implement sustainable development outcomes, including the reuse of existing infrastructure and promoting redevelopment of TOD projects. These TOD projects provide the extended benefit of a sustainable work, live, and play community that is interconnected to other communities. Additional benefits of a TOD project typically include improved quality of life and increased economic vitality and jobs.

- i. Integrating Equitable Development or Livability Principles: The new GLX light rail service will also provide direct environmental benefits by reducing the number of buses and cars on the road. In addition, the Ball Square station design is integrated into the planned Somerville Community Path to facilitate additional use of non-automobile travel through coordination of transit and bicycle pedestrian facilities.

c. Economic and Community Benefits (long-term benefits)

- i. Economic or Other Benefits: As discussed, the proposed GLX project will provide an economic benefit to the areas of Somerville and Medford in the form of increased development, more businesses and jobs, increased property values. The rapid transit will provide an alternative mode of transportation and will reduce personal vehicle emissions and traffic congestion in these areas. The GLX will also promote walking with the expansion of the Community Path.
- ii. Job Creation Potential: Partnerships with Workforce Development Programs: The MBTA will work to promote local hiring and procurement or link members of the community to potential employment opportunities related to brownfield cleanup or redevelopment.

5. Programmatic Capability and Past Performance

a. Programmatic Capability

The MBTA has both the administrative capacity to implement the project and the technical capacity to manage it. The MBTA staff's capability will be supplemented through the assistance of professional design and construction management services of the type that are typically brought under the contract for a specific project. Alternatively, the MBTA may use the design experience of an on-call consultant. The MBTA is an experienced Federal grantee and has the systems and internal controls needed in place to separately track and report on the funding under this grant.

b. Audit Findings

The MBTA participates in the Triennial Reviews conducted by the Federal Transit Administration. The Triennial Review is one of the Federal Transit Administration's (FTA) management tools for examining grantee performance and adherence to current FTA requirements and policies. Mandated by Congress in 1982, the Triennial Review occurs once every three years. It examines how recipients of Urbanized Area Formula Program funds meet statutory and administrative requirements. The review currently examines 17 areas. The last Triennial Review of the MBTA occurred in FY 2016. All findings have been successfully closed out by the MBTA.

c. Past Performance and Accomplishments

i. Currently or Has Ever Received an EPA Brownfields Grant:

This section is not applicable to the MBTA.

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

1. Purpose and Accomplishments:

The MBTA has been awarded Federal Grants in the past, including the following:

In April 2009, the United States Department of Environmental Protection Agency (USEPA) awarded the Massachusetts Department of Environmental Protection (MADEP) with a grant from the State Clean Diesel Grant Program. With this \$1.1 Million Dollars in grant funding the MBTA with to repower 11 MBTA locomotives with new Head End Power (HEP) Units.

Also in 2009, the MBTA received \$2.5 Million in grant award from the Federal Transit Administration (FTA) in Transit Investments for Greenhouse Gas and Energy Reduction (TIGGER) funds for the development of wind turbine projects.

2. Compliance with Grant Requirements:

The MBTA routinely complies with the work plan, schedule and terms and conditions of grant funded projects. The MBTA has a history of timely and acceptable reporting, as required by the awarding agency/organization.

- iii. Has Never Received Any Type of Federal or Non-Federal Assistance Agreements:
This section is not applicable to the MBTA.