

Eligible and Ineligible Costs for Tax Base Revitalization Account (TBRA) Cleanup Grants

(Note: The eligible costs listed here are for environmental investigation associated with TBRA **cleanup grants**. Please see the appropriate listing for eligible costs related to **cleanup-site investigation grants**.)

Eligible costs are those associated with the development and implementation of a response action plan (RAP) in order to protect the public health or welfare or the environment. This typically includes work conducted as part of the following categories environmental investigation, RAP preparation, soil remediation, soil vapor mitigation, and hazardous substance abatement (i.e., asbestos-containing materials and lead-based paint) as part of the cleanup of a site. Grantees may request reimbursement of costs that meet the terms and conditions of the grant agreement as outlined and defined in the Project Summary. The lists below provides examples of [eligible](#) and [ineligible](#) costs.

Applicants with questions about eligibility should contact the [TBRA Program Coordinator](#), and grantees with questions about active grants should contact the [LCA Grant Administrator](#) if they have any questions related to eligibility.

Eligible Costs for TBRA Cleanup Grants

- I. Environmental Investigation
 - A. Hazardous materials survey
 1. Sampling (i.e., bulk and air)
 2. Chemical analysis
 3. Documentation
 - B. Phase I Environmental Site Investigation
 - C. Phase II Environmental Site Investigation
 1. Drilling
 2. Test pits
 3. Water sampling (e.g., drilling new or using existing wells, sealing wells)
 4. Chemical analysis
 5. Documentation report
- II. RAP Preparation
 - A. Documentation report
 - B. Soil vapor system design
 - C. Review by the Minnesota Pollution Control Agency (MPCA)
- III. Cleanup
 - A. Demolition (as necessary to access contamination **ONLY**)
 1. Building demolition (pro-rated for the portion of the building that is covering contaminated soil)
 2. Explosive or implosive demolition

3. Demolition of building footings and foundations
 4. Removal of:
 - a. Existing fencing around the eligible structures to be demolished;
 - b. Concrete pavement through hydrodemolition;
 - c. Catch basin or manhole frames and covers;
 - d. Roadside delineators;
 - e. Guide posts;
 - f. Fire hydrants;
 - g. Masonry walls, block or tile, brick or stone;
 - h. Median barriers;
 - i. Sewer/water pipe;
 - j. Railroad tracks; and/or
 - k. Bituminous sidewalks.
 5. Slab-on-grade
 6. Selective demolition
 - a. Gutting existing structures; or
 - b. Saw and torch cutting.
 7. Pest control (prior written approval from the Council required)
 8. Videotaping (prior written approval from the Council required)
 9. Security fencing used to limit exposure to exposed pollutants while remediation is in process
 10. Utility disconnection
 11. Disposal charges
 12. For demolition in asbestos-contaminated areas only:
 - a. Demolition of ceiling, including suspension system, plaster and lath;
 - b. Non-load bearing partitions; and/or
 - c. Respirator equipment.
- B. Site preparation as necessary to access contamination or accomplish cleanup only
1. Site clearing and grubbing
 - a. Cut and chip trees
 - b. Stump removal
 - c. Brush clearing
 - d. Selective clearing and tree removal
 - e. Stripping and stockpiling of soil
 2. Dewatering
 - a. Drainage ditch excavation
 - b. Pumping
 - c. Sump hole construction
 - d. Wells for dewatering
 - e. Wellpoints
 3. Shoring and underpinning
 - a. Pressure grouting
 - b. Sheet piling
 - c. Shoring
 - d. Underpinning

- e. Vibroflotation
4. Excavation support/protection
 - a. Cofferdams
 - b. Rock bolting
5. Earthwork
 - a. Equipment mobilization or demobilization
 - b. Interim grading
6. Excavation and fill
 - a. General and structural backfill
 - b. Structural compaction
 - c. Drilling and blasting rock
 - d. Bulk bank measure excavating
 - e. Bulldozer or scraper excavating
 - f. Structural excavation
 - g. Hauling
 - h. Fill and fill-by-borrow
 - i. Trench excavation
 - j. Utility trench excavation
 - k. Utility bedding
- C. Soil remediation
 1. Mobilization / demobilization
 2. Soil sampling
 3. Contaminant stabilization (e.g., metals)
 4. Excavation (including environmental oversight at project site)
 5. Shoring to access contamination
 6. Soil segregation
 7. Loading
 8. Hauling
 9. Disposal
 10. Capping or confinement of contaminants
 11. Removal of leaking above-ground or underground storage tanks (unless eligible for Petrofund reimbursement)
 - a. Off-site disposal of sludge
 - b. Hauling tank to certified salvage dump
 - c. Disposal of contaminated soil to landfill or bituminous concrete batch plant
 - d. Decontamination of soil on site including poly tarp on top and bottom
 12. Collection and treatment of leachate or runoff
 13. Incineration of petroleum-impacted soil
 14. Backfill
 15. Grading
- D. Soil vapor mitigation
 1. Mobilization / demobilization
 2. Excavation
 3. Loading

4. Hauling
 5. Disposal
 6. Installation of soil vapor extraction system (e.g., drilling, trenching)
 7. Operation of soil vapor extraction system (e.g., carbon filter cartridges, air sparging, utility costs associated with operation of the soil vapor extraction system, periodic checks and maintenance)
 8. Vapor barrier or clay liner
 9. Depressurization systems
 10. Backfill
 11. Grading
 12. Abandoning sample well (e.g., sealing wells)
- E. Asbestos abatement work
1. Separation barriers
 2. Personnel decontamination chamber
 3. Personnel sampling pump
 4. Whole body worker protection unit
 5. Shower unit
 6. Set up and removal of decontamination facilities
 7. Waste decontamination chamber
 8. Polyethylene sheeting surface covering
 9. Sealing floor penetrations with foam firestop
 10. Caulking seams with latex
 11. Air filtration devices
 12. Vacuum loader
 13. Water atomizer unit
 14. Disposable fiber drums
 15. Spraying exposed substrate with surfactant (bridging)
 16. Fine cleaning substrate
 17. Rental of equipment, such as airless sprayer units or vacuum loaders (note that the purchase of fixed assets that could be re-used on subsequent work by the contractor is ineligible)
 18. Final cleaning of protected surfaces
 19. Lead paint removal or stabilization

- IV. Monitoring, maintenance and environmental assurance
 - A. MPCA Review (fee for service program, includes preparatory work for the Letter of Assurance)
 - B. Operation and maintenance of a soil vapor extraction system
 - C. Operation, sampling and maintenance of water quality (typically, ground water)
 - D. Implementation documentation (e.g., RAP, Implementation Report, or the Final Asbestos Report)
 - E. Institutional control (negotiating and drafting environmental covenants – e.g., deed restriction)
- V. Other costs
 - A. Public acquisition *may* be eligible
 - B. Project oversight costs by consulting staff (including environmental engineering, on-site project management, production of environmental documentation [e.g., RAP, system designs, RAP amendments, technical documents for bid preparation], etc.)
 - C. Utility costs (e.g., electrical power, water) to conduct pre-demolition abatement
 - D. Removal of or cleaning (e.g., sandblasting) petroleum-impacted concrete
 - E. Personal protective equipment (e.g., gloves, masks, respirators, etc.)

Ineligible Costs for TBRA Cleanup Grants

“Soft costs”— costs not necessary or essential to completing the project activity for which funding was awarded— are not eligible for reimbursement from Livable Communities grant funds. Following are some of the soft costs ineligible for reimbursement. **Please consult with Livable Communities Grant staff regarding questions about costs not listed.**

1. Demolition costs *not associated with accessing contamination*.
2. Erosion and sedimentation control that are typically considered project costs, not clean up costs, including rip-rap and rock lining and synthetic erosion control, such as jute mesh, hay bales, silt fencing, stapled plastic netting, etc.
3. Geotechnical investigation and geotechnical work (e.g., installation of Geocopiers, compaction, etc.)
4. Hazardous material removal, such as removal of assorted hazardous (e.g., switches, ballasts, compact florescent light bulbs, acids, etc.) or regulated materials (e.g., bulk cooking oils, molasses, etc.)
5. Health and safety plans, even if they are specific to the contamination.
6. Site acquisition costs incurred by a private party.
7. Site surveys (usually incorporated into excavating and grading costs already)
8. Solid waste removal and construction debris (e.g., tires, appliances, construction waste, household waste)
9. Administrative overhead: the typical costs of doing business, including administrative staff salaries, project management, project coordination, oversight activity, office equipment, printing, copying, faxing, meetings, mailing, delivery, courier, etc.
10. Operating expense: day to day expenses, including but not limited to salaries and wages, insurance costs, maintenance contracts, space rental, etc.
11. Salaries that are a part of the administrative overhead or operating expense.
12. Architect, developer, legal or other fees.
13. Marketing costs.
14. Costs associated with master plans or redevelopment plans, design workshops, design standards, market studies, zoning and land use implementation tools.
15. Leases for trailers or space.
16. Bonds and insurance: including all forms of bonds and insurance fees.
17. Eminent domain: costs associated with exercising eminent domain authority. (Note: see <http://www.metrocouncil.org/services/livcomm/EminentDomainPolicy.htm> for information regarding restrictions on grants for projects using eminent domain for economic development).
18. Food and beverage: All costs incurred for food and beverages.
19. Legal fees: attorney fees, including administrative costs, legal assistance to prepare proposals, requests for proposals, bids, oversight, document review, etc.
20. Licenses/authorization fees associated with any license or authorization, including costs to hire people with licenses or authorization.

21. Permits, including but not limited to building permits, construction, redevelopment, equipment use, special use, grading, excavation, etc.
22. Planning costs, including comprehensive planning costs and all other planning and plan preparation costs.
23. Travel costs incurred by any employees, project staff, contractors, project managers, and/or consultants traveling to and from the project site or meeting sites, etc.; includes costs such as lodging, parking fees, per diem costs, other allowances, etc.
24. Site assembly of land to be used for transit infrastructure or capital improvements, such as transit stations, station platforms, park-and-ride facilities (unless park-and-ride spaces will be used for shared parking).
25. Activities after the expiration date of the grant agreement or, with the exception of activities specifically noted in Attachment A to the Grant Agreement, activities prior to the date of the award.