

Audit of the EPA's Brownfields Program Management and Funding Allocations

July 23, 2025 | Report No. 25-P-0043



Abbreviations

ACRES	Assessment, Cleanup and Redevelopment Exchange System
BUILD Act	Brownfields Utilization, Investment, and Local Development Act
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
C.F.R.	Code of Federal Regulations
EPA	U.S. Environmental Protection Agency
FTE	Full-Time Equivalent
FY	Fiscal Year
GRIP	Grants Research Information Portal
IIJA	Infrastructure Investment and Jobs Act
OBLR	Office of Brownfields and Land Revitalization
OIG	Office of Inspector General

Cover Image

Individuals at an Absentee Shawnee Tribe Brownfields Job Training Program worksite. (EPA image)

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At a Glance

Audit of the EPA's Brownfields Program Management and Funding Allocations

Why We Did This Audit

To accomplish this objective:

The U.S. Environmental Protection Agency Office of Inspector General conducted this audit to determine how the EPA has managed its Brownfields Program and allocated funds under the program since enactment of the Brownfields Utilization, Investment, and Local Development Act of 2018. That Act required the OIG to submit a report to Congress that describes the EPA's management of its Brownfields Program, including the allocation of funds.

Congress formally established the EPA's Brownfields Program by amending the Comprehensive Environmental Response, Compensation, and Liability Act in 2002. This Act defines a brownfield site as "real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant."

The Brownfields Utilization, Investment, and Local Development Act of 2018 amended the Brownfields Program.

To support this EPA mission-related effort:

- *Cleaning up and revitalizing land.*

Address inquiries to our public affairs office at (202) 566-2391 or OIG.PublicAffairs@epa.gov.

[List of OIG reports.](#)

What We Found

The EPA's Brownfields Program is managed through the Office of Land and Emergency Management's Office of Brownfields and Land Revitalization. The program uses funds appropriated annually by Congress to award competitive grants and offer technical assistance to state, local, and tribal governments; nonprofit organizations; and other tax-exempt organizations under section 104(k) of the Comprehensive Environmental Response, Compensation, and Liability Act. The EPA also awards noncompetitive grants and technical assistance to states and tribes under section 128(a) of the Act.

Brownfields funding recipients use EPA grants and technical assistance to conduct site assessments and cleanups, create brownfields inventories, develop site reuse plans, and conduct other brownfields activities. The Office of Brownfields and Land Revitalization distributes funds to the regions, which, in turn, award and monitor the grants.

We found that the EPA provided approximately \$1.26 billion in brownfields grant funding from fiscal year 2017 through 2023. Nearly 93 percent of the total grant funding during this period was allocated to competitive assessment, revolving loan fund, and cleanup grants and to noncompetitive section 128(a) state and tribal response grants. The EPA distributed its brownfields grant funding through the ten EPA regional offices and its headquarters. Grant recipients in EPA Region 1 received the most funding, followed closely by recipients in EPA Region 5. The EPA's brownfields funding allocations for FY 2023 were more than 200 percent higher than the average funding allocations from FY 2017 through 2021 because of increased program funding through the Infrastructure Investment and Jobs Act.

We make no recommendations in this report because of the descriptive nature of our audit objective. However, we identified two areas that may warrant management attention and further research:

- Data inaccuracies in the EPA's Grants Research Information Portal database, which could limit EPA staff's ability to accurately monitor and report on grant funds using the database.
- Increased grant funding due to Infrastructure Investment and Jobs Act appropriations, which could pose challenges for EPA oversight of grant funds and associated results. The EPA will have to monitor a higher number of brownfields projects—including larger, more complex projects—for years after FY 2026 while not receiving additional Infrastructure Investment and Jobs Act appropriations to fund regional oversight staff.

Cleaning up and reinvesting in brownfield sites can reduce public health and environmental risks; increase local tax bases; facilitate job growth; and reduce development pressures on green, noncontaminated spaces and working lands.



OFFICE OF INSPECTOR GENERAL
U.S. ENVIRONMENTAL PROTECTION AGENCY

July 23, 2025

MEMORANDUM

SUBJECT: Audit of the EPA's Brownfields Program Management and Funding
Allocations Report No. 25-P-0043

FROM: Nicole N. Murley, Acting Inspector General *Nicole N. Murley*

TO: Barry Breen, Principal Deputy Assistant Administrator
Office of Land and Emergency Management

This is our report on the subject audit conducted by the U.S. Environmental Protection Agency Office of Inspector General. The project number for this audit was OA-FY24-0106. This report does not contain any findings or recommendations.

A response to this report is not required because the report contains no recommendations. If your office submits a response, however, it will be posted on the OIG's website, along with our memorandum commenting on the response. The response should be provided as an Adobe PDF file that complies with the requirements of section 508 of the Rehabilitation Act of 1973, as amended. The final response should not contain data that your office does not want released to the public; if the response contains such data, your office should identify the data for redaction or removal along with corresponding justification.

We will post this report to our website at www.epaoig.gov.

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Purpose

The U.S. Environmental Protection Agency Office of Inspector General initiated this audit to determine how the EPA has managed its Brownfields Program and allocated funds under the program since the enactment of the Brownfields Utilization, Investment, and Local Development Act of 2018, or BUILD Act. This audit report responds to a mandate in the BUILD Act that the EPA OIG submit such a report to Congress.

Background

A *brownfield site* is defined by the Comprehensive Environmental Response, Compensation, and Liability Act, or CERCLA, as “real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.” A site may become a brownfield because of industrial use, resource extraction, or other uses that leave behind hazardous substances. According to the EPA, cleaning up and reinvesting in brownfield sites reduces public health and environmental risks. In addition, doing so reduces development pressures on noncontaminated spaces and working lands. Further, cleaning up and reinvesting in brownfield sites increases employment opportunities, investments, and tax bases, ultimately benefitting local economies.

A Government Accountability Office [report](#) estimated that there are 450,000 to 1 million brownfield sites in the United States, and the EPA continues to use this estimate. According to the EPA, the Agency provided funding to local governments in the mid-1990s for brownfields pilot projects. Along with this early funding, the EPA developed guidance and tools for local governments to use when cleaning and redeveloping brownfield sites. The 2002 Small Business Liability Relief and Brownfields Revitalization Act amended the CERCLA to provide funds to assess and clean up brownfields. The Small Business Liability Relief and Brownfields Revitalization Act also clarified CERCLA liability protections, provided funds to enhance state and tribal response programs, and codified many of the EPA’s brownfields practices, policies, and guidance documents. The BUILD Act reauthorized the EPA’s Brownfields Program and changed available grant funding, including for the State and Tribal Response Program. Further, under the 2021 Infrastructure Investment and Jobs Act, or IIJA, Congress provided significant funding to support public infrastructure improvements, including brownfields and land revitalization projects.

Scope and Methodology

This was a limited scope audit designed to address a BUILD Act requirement that the EPA OIG report to Congress a description of the EPA’s management of its Brownfields Program, including of the allocation of funds. Our report is descriptive rather than evaluative, and it identifies areas needing further research, which we will consider when planning future audit work.

We conducted this audit from July 2024 to March 2025 in accordance with generally accepted government auditing standards. Those standards require that we plan and perform the audit to obtain sufficient, appropriate evidence to provide a reasonable basis for our findings and conclusions based on

our audit objective. We believe that the evidence obtained provides a reasonable basis for our results and conclusions based on our audit objective.

We assessed the internal controls necessary to satisfy our audit objective.¹ In particular, we assessed the internal control components—as outlined in the U.S. Government Accountability Office’s *Standards for Internal Control in the Federal Government*—significant to our audit objective. Any internal control deficiencies we found are discussed in this report.

Our audit focused on fiscal years 2017 through 2023.² We reviewed congressional budget appropriations for the EPA’s Brownfields Program. We reviewed past OIG reports pertaining to the Brownfields Program, including a 2004 report that responded to the first legislative mandate for the OIG to report on the EPA’s Brownfields Program. We reviewed the BUILD Act amendments to and applicable statutory requirements from CERCLA, the Small Business Liability Relief and Brownfields Revitalization Act, and the IIJA. We also reviewed the Brownfields Program’s website and the Office of Brownfields and Land Revitalization’s, or OBLR’s, organizational structure, staffing levels, and budget appropriations. In addition, we determined the EPA regional offices’ role in managing brownfield funds. Further, we reviewed applicable OBLR program documentation, including grant funding guidelines; frequently asked questions; grant funding opportunity notices; outreach presentations; and funding terms and conditions. We also reviewed the EPA’s brownfields competitive and noncompetitive funding programs and interviewed OBLR staff about accessing brownfields grant funding data using the EPA’s Grant Research Information Portal, or GRIP, and Assessment, Cleanup and Redevelopment Exchange System, or ACRES. We analyzed brownfields grant funding data in GRIP and ACRES to determine the funding allocations from FY 2017 through 2023.

Prior Reports

EPA OIG Report No. [2004-P-0020](#), *Substantial Progress Made, But Further Actions Needed in Implementing Brownfields Program*, issued June 21, 2004, responded to the initial congressional reporting requirement for the Brownfields Program in the Small Business Liability Relief and Brownfields Revitalization Act.³ The report examined how the Brownfields Program’s implementation effort proceeded during the first year and how effective the program had been in instituting major program components. The report concluded that, although stakeholders were generally pleased during the first

¹ An entity designs, implements, and operates internal controls to achieve its objectives related to operations, reporting, and compliance. The U.S. Government Accountability Office sets internal control standards for federal entities in GAO-14-704G, *Standards for Internal Control in the Federal Government*, issued September 2014.

² We included FY 2017 funding allocations in our review because it was the last full fiscal year before enactment of the BUILD Act. Therefore, FY 2017 serves as a baseline for program operations prior to the BUILD Act. We excluded FY 2024 funding allocations from our review because our fieldwork occurred during FY 2024, and brownfields funding data for the full fiscal year were not available.

³ Under the 2002 Small Liability Relief and Brownfields Revitalization Act, Congress mandated that the EPA OIG report to Congress on the EPA’s management of the Brownfields Program, including allocation of funds.

year of the Brownfields Program, the EPA experienced problems with program implementation. Specifically, grant applicants and the EPA regions had the following concerns:

- Guidance to the regions was untimely and unclear.
- Grant applicants needed additional guidance.
- The grant process was too time consuming.
- The application review process limited the regions' abilities to provide feedback.

The report also noted issues that could create challenges in the future if not addressed in a timely manner, including that the applicant and site eligibility determination process lacked documentation; the deadlines for ownership of properties for some cleanup grant applicants were extended three times; the environmental performance data for brownfields grants were not reflected in the Brownfields Program's objectives; and the regions reported a lack of Brownfields Program travel funds. We recommended that the EPA develop a process for sampling a portion of applicants to evaluate the applicants' eligibility for a brownfields grant, not extend ownership deadlines, use data gathered from the Property Profile Form to establish performance goals, and report performance goals and measures for the grants awarded under the expanded program that are separate from the results of the pilot program. We also recommended that the EPA evaluate the current workload model to determine whether the new demands and responsibilities of the expanded program required an updated workload model. The Agency completed all corrective actions for the report recommendations. The report indicated that the OIG anticipated issuing two reports responsive to the Small Business Liability Relief and Brownfields Revitalization Act reporting requirement.

A second brownfields-related report, OIG Report No. [2005-P-00009](#), *Brownfields Competition Process for Awarding Grants Complied With Act*, issued March 7, 2005, did not mention the congressional reporting requirement. We sought to determine whether the Office of Brownfields Cleanup and Redevelopment—which was the EPA's brownfields office at the time—established a competition process that complied with the Small Business Liability Relief and Brownfields Revitalization Act and the EPA's policy and guidance.

Our review found that the EPA's competition process for awarding grants complied with the requirements of the Small Business Liability Relief and Brownfields Revitalization Act, but that EPA staff did not always follow the Agency's cost review policy. We recommended that the EPA remind project officers to document cost reviews, in accordance with EPA policy, prior to the grant award. The Agency agreed with the recommendation and initiated appropriate corrective actions before the final report was issued.

The EPA OIG also recently issued two reports related to brownfield grant oversight:

- Report No. [17-P-0368](#), *Improved Management of the Brownfields Revolving Loan Fund Program Is Required to Maximize Cleanups*, issued August 23, 2017.
- Report No. [22-P-0033](#), *Brownfields Program-Income Monitoring Deficiencies Persist Because the EPA Did Not Complete All Certified Corrective Actions*, issued March 31, 2022.

Report No. 17-P-0368 contains recommendations related to brownfields grant monitoring, which we identify as one area needing further research below. The report recommended numerous actions to improve brownfields revolving loan fund tracking and accountability, including additional staff training and implementing a time frame for recipients to use or return available program funds to the EPA. We followed up on the status of corrective actions from Report No. 17-P-0368 and issued Report No. 22-P-0033. The follow-up report concluded that some of the EPA's corrective actions from the 2017 audit were still incomplete and that the EPA continued to lack the current, accurate, and complete data necessary for effective post-closeout monitoring of program income. We made six recommendations to the Agency, and the Agency has completed corrective actions for all but two of the recommendations. Those recommendations remain open with corrective actions planned to be completed by September 30, 2027.

Results

The OBLR, which is in the Office of Land and Emergency Management, manages the EPA's Brownfields Program. According to a dedicated EPA [webpage](#), the Brownfields Program endeavors to "empower states and communities to work together to prevent, assess, safely clean up and sustainably reuse contaminated properties." The Brownfields Program receives annual funding appropriations from Congress and distributes much of this funding through competitive and noncompetitive grants and technical assistance. According to the OBLR, project officers manage grants in their corresponding EPA region, except for some technical assistance grants. The OBLR distributes funds to the regions, which, in turn, award, oversee, and monitor the grants.

Brownfields Program Appropriations

The EPA's Brownfields Program is funded annually by federal appropriation acts.⁴ The majority of the Brownfields Program's regular funding is from two state and tribal assistance grant appropriations. The largest state and tribal assistance grant appropriation has historically been for implementing CERCLA section 104(k), and most of these funds are awarded as competitive grants. The Brownfields Program also receives state and tribal assistance grant funding for noncompetitive grants authorized under CERCLA section 128(a).

CERCLA section 104(k): Section 104(k) of CERCLA authorizes grants for brownfield revitalization. This section identifies ranking criteria for brownfields grant applications, including the proposed project's potential to stimulate economic development, reduce threats to human health and the environment, and meet the needs of the community.

CERCLA section 128(a): Section 128(a) of CERCLA authorizes the EPA to provide funding to states, U.S. territories, the District of Columbia, and tribes to establish or enhance their environmental response programs. This section also authorizes the EPA to provide funding for other brownfields-related purposes.

Funding for Brownfields Program staff and resources is appropriated through Environmental Programs and Management funds. Most of this funding is used for staff salary and Working Capital Fund needs,

⁴ Appropriations acts are enacted legislation that give federal agencies the authority to incur obligations and to make payments out of the U.S. Department of the Treasury for specific purposes.

such as phones, computers, internet, and security, with the remaining discretionary funds available for additional supplies, training, travel, and contractor support. The OBLR told us that it distributes the majority of discretionary Environmental Programs and Management funding to the regions, with regions often submitting requests for specific support needs, but the EPA Office of the Chief Financial Officer determines the amount of salary and working capital funds to be sent to the regions.

In addition to annually appropriated State and Tribal Assistance Grant and Environmental Programs and Management funds, the Brownfields Program was appropriated \$1.5 billion under the IIJA. The program received \$300 million annually for FYs 2022 through 2025 and the EPA expects to receive \$300 million for FY 2026 to fund additional awards under CERCLA section 104(k) and CERCLA section 128(a). The OBLR told us that it distributes IIJA funds to the regions, and the regions manage the grants in the same manner as awards funded with regular appropriations. The IIJA funding is the largest single investment in the Brownfields Program's history, nearly doubling the program's regular appropriations for FYs 2022 and 2023. The IIJA funds will be available to the Brownfields Program until expended. See Table 1 for a breakdown of program appropriations for FYs 2017 through 2023.

Table 1: Appropriations for the EPA's Brownfields Program, FYs 2017–2023

FY	Environmental Programs and Management funding (\$ in millions)	Funding under CERCLA section 104(k)—primarily for competitive grants and technical assistance (\$ in millions)	Funding under CERCLA section 128(a)—for noncompetitive grants and technical assistance (\$ in millions)	Total (\$ in millions)
2017	25.6	80.0	47.7	153.3
2018	25.6	80.0	47.7	153.3
2019	25.6	87.0	47.7	160.3
2020	23.6	89.0	46.2	158.8
2021	24.0	91.0	46.2	161.2
2022	24.0	92.0	46.2	162.2
2022 IIJA appropriations	—	240.0	60.0	300.0*
2023	26.2	100.0	47.2	173.4
2023 IIJA appropriations	—	240.0	60.0	300.0*
Total	174.6	1,099.0	448.9	1,722.5

Source: Appropriations acts and accompanying explanatory statements for FYs 2017 through 2023 and the EPA. (EPA OIG table)

* According to OBLR staff, a small percentage of the OBLR's IIJA funding is set aside for administrative costs. The OBLR received approximately \$288 million annually for grants and technical assistance—approximately \$230 million in CERCLA section 104(k) funds and approximately \$58 million in CERCLA section 128(a) funds.

Brownfields Program Staffing and Organizational Structure

The OBLR's staffing ceiling is 18.7 full-time equivalent, or FTE, employees to implement the Brownfields Program, but of that number, only 16.6 FTE employees are in the OBLR.⁵ OBLR staff told us that, as of September 30, 2024, the office also had 1.8 IIJA-funded FTE employees for a total ceiling of 20.5 FTE employees, and that the OBLR's regularly appropriated FTE employee count has been 16 to 18 FTE employees since FY 2017. The OBLR has director and deputy director positions—both of which were vacant as of May 202—and three teams:

- The Budget and Management Team.
- The Grants Management Team.
- The Policy, Research, and Outreach Team.

According to the OBLR, the EPA regional offices have a combined ceiling of 108.5 FTE employees through regular appropriations to support the OBLR's brownfields and land revitalization efforts, and the regions received 47.5 FTE employees through IIJA appropriations, for a total regional FTE employee ceiling of 156. The OBLR told us that the Brownfields Program was only projected to occupy 140.14 FTE employees as of September 30, 2024, and that the regions may choose to distribute these FTE employees to other program areas. The OBLR told us that the current regional FTE employee ceiling of 156 will drop back to 108.5 without IIJA funding in FY 2027, unless carryover funds are available to extend these FTE employees. In addition, the OBLR told us that it has discussed using carryover funds to extend regional FTE employees, but that it is unsure of how much carryover funding will be available or how the Office of the Chief Financial Officer will manage such funds. Once the IIJA funding is expended, these positions will not be reallocated to other EPA programs; there will simply not be funding for more than 108.5 FTE employees unless Congress appropriates permanent funding.

OBLR staff told us that the numbers of both OBLR and regional FTE employees funded via regular annual appropriations remained stable from FY 2017 through 2023.

General Roles and Responsibilities for Brownfields Activities

The Brownfields Program awards grant funding; offers technical assistance through EPA contractors, nationwide providers, and other entities; and provides tools and guidance to communities on brownfields and land revitalization topics, including site assessment, cleanup, liability, and reuse planning. The OBLR coordinates grant competitions and announcements with the EPA regions, and the selection official in the Office of Land and Emergency Management makes grant award selections. The EPA's regional grants management offices award the grants. Regional project officers are primarily responsible for grants management and oversight, including grant tracking and monitoring.

⁵ The OBLR assigns 2.1 of its 18.7 FTE employees to other EPA program offices. Specifically, 1.3 of OBLR's FTE employees are in the EPA Office of Communications, Partnerships, and Analysis, while 0.8 of OBLR's FTE employees are in the Office of Land and Emergency Management front office. This leaves the OBLR with 16.6 regularly appropriated FTE employees.

States and tribes set brownfields site cleanup standards, develop brownfields policy, and oversee and approve brownfields site cleanup and reuse plans by administering their state or tribal response program.

Brownfields grantees use EPA grants to conduct brownfields activities, such as assessing and cleaning up sites, creating brownfields inventories, and developing site reuse plans. A grantee may be a state, local, or tribal government; a nonprofit organization; or another tax-exempt organization.

Types of Brownfields Funding

The EPA's Brownfields Program provides competitive and noncompetitive funding for brownfield projects. The majority of the program funding is awarded as competitive grants or cooperative agreements using CERCLA section 104(k) appropriations.⁶ There are five types of competitive grants that are funded using CERCLA section 104(k) appropriations. An EPA [webpage](#) about brownfields funding describes these grants as follows:

- **Assessment Grants** “provide funding for brownfield inventories, planning, environmental assessment, and community outreach.”
- **Cleanup Grants** “provide funding to carry out cleanup activities at brownfield sites owned by the applicant.”
- **Multipurpose Grants** “are appropriate for communities that have identified through community engagement efforts a discrete area (such as a neighborhood, a number of neighboring towns, a district, a corridor, a shared planning area or a census tract) with one or more brownfield sites.”
- **Revolving Loan Fund Grants** “provide funding for a grant recipient to capitalize a revolving loan fund and to provide loans and subgrants to carry out cleanup activities at brownfield sites. Through these grants, [the] EPA strengthens the marketplace and encourages stakeholders to leverage resources to clean up and redevelop brownfields. When the loans are repaid, the loan amount is returned to the fund and re-lent to other borrowers, providing an ongoing source of capital within a community.”
- **Job Training Grants** “provide funding to nonprofits, local governments, and other eligible organizations to provide environmental training for residents impacted by brownfield sites in their communities.”

The EPA also provides funding under CERCLA section 104(k) to organizations that work with communities to address their brownfields challenges through training and technical assistance. Technical assistance programs funded under CERCLA section 104(k) include the Technical Assistance to Brownfields Communities grants, Nationwide Brownfields Technical Assistance grants, Targeted Brownfields Assessment, and Land Revitalization Technical Assistance. Some types of technical

⁶ According to the OBLR, the terms “cooperative agreement” and “grant” are used interchangeably throughout the Brownfields Program and its guidance documents. The EPA sometimes uses the term “cooperative agreement” because the EPA is substantially involved during the performance of the contemplated activities.

assistance funding are awarded competitively whereas other types are offered noncompetitively, according to the EPA. CERCLA section 104(k) appropriations can also be used to noncompetitively recapitalize existing revolving loan funds.

The EPA's Brownfields Program also provides noncompetitive funding to state and tribal response programs using CERCLA section 128(a) appropriations. Noncompetitive grants authorized under CERCLA section 128(a) are available to states, tribal nations, and territories on an annual cycle. The EPA also funds technical assistance grants under CERCLA section 128(a).

According to the OBLR, the total amount of funding for each grant type is decided upon through the consideration of a combination of factors, including regional input, the current administration's priorities, and statutory limitations. See Appendix A for details on the brownfields funding types.

Brownfields Funding Announcements and Applications

According to the OBLR, it announces the availability of brownfields funding opportunities through EPA websites, [Grants.gov](https://www.grants.gov), regional and national outreach webinars, and other relevant communication channels. All entities must apply through [Grants.gov](https://www.grants.gov). To do so, the applicant must have an active [SAM.gov](https://www.sam.gov) account and a unique entity identifier number.⁷ The OBLR told us that this process is not controlled by the EPA but is in place to help ensure that all applicants for federal grants have their organizations' identities verified.

OBLR staff told us that when the EPA receives initial applications from [Grants.gov](https://www.grants.gov), each eligible application is assigned to a panel of reviewers. The panel of reviewers evaluates the application against the ranking criteria outlined in the funding opportunity notice. The OBLR told us that if the application is from an entity that previously received a brownfields grant, someone other than the current or previous project officer reviews the merits of the proposed project to avoid conflict-of-interest concerns.

According to the OBLR, once the selection official in the Office of Land and Emergency Management selects an application, the assigned regional project officer will prepare the application for award by completing the funding recommendation and commitment notice and negotiating the work plan with the selected applicant. Once the project officer finalizes all the paperwork, the regional grants management office awards the grant. The EPA's Brownfields Program webpages contain guidance for applicants on how to apply for the various types of funding.

The Brownfields Program's Management Controls

The EPA has developed reviews and other management controls that, if implemented, should help ensure that brownfields funding and activities adhere to applicable regulations, policies, procedures, and guidance, and should ultimately result in the assessment, safe cleanup, and sustainable use of brownfield sites. The EPA Brownfields Program's management controls include grant application

⁷ SAM.gov is the official U.S. government system for contract opportunities, contract data, wage determinations, federal hierarchy, assistance listings, entity information, and entity reporting.

reviews, cost analysis and budget reviews, quality management plans and quality assurance project plans, work plans, funding recommendations, and grants monitoring. We describe these controls below.

Grant Application Review

Pursuant to 40 C.F.R. §§ 35.110 –11, the EPA must review each complete grant application and may approve an application that, among other things, meets the requirements of applicable federal statutes, regulations, and circulars. The EPA's brownfield grant application guidelines direct applicants to provide information regarding revitalization plans, community funding needs, community involvement plans, and other information. Additionally, applicants must describe the specific sites and target areas that they plan to address with the funding. Applicants must also describe the expected environmental results of work conducted under the grant. A panel of reviewers evaluates the extent to which the application meets the criteria outlined in the guidelines.

Cost Analysis and Budget Review

The EPA's *Cost Review Guidance*, GPI-00-05, provides that, in preparation for award, EPA personnel should review grant applications to ensure that the proposed budget—including the personnel, fringe benefits, travel, equipment, supplies, contractual services, and other costs—is reasonable. The EPA's brownfield grant application guidelines direct applicants to provide a detailed list of tasks to be completed; a description of how the tasks will be funded, including funding outside of the grant; the anticipated task timeline; and an explanation of who will lead these tasks. Applicants must also address how they will procure any needed contractors or qualified environmental professionals. The regional project officer performs the cost analysis and budget review.

Quality Management Plan and Quality Assurance Project Plan

EPA Directive CIO 2105.4, *Environmental Information Quality Policy*, requires that EPA organizations develop a quality management plan and a quality assurance project plan that they will apply to grantees. A quality management plan is a formal document that describes a quality program's organizational structure; management and staff's functional responsibilities; lines of authority; and required engagements for those planning, implementing, and assessing all activities. A quality assurance project plan is a planning document related to a project or program that describes in comprehensive detail the necessary quality assurance and quality control requirements and other technical activities that the grantee must implement to ensure that the results of the work performed will satisfy the stated performance and acceptance criteria. The EPA's brownfield terms and conditions require that the project officer be substantially involved in overseeing the selected recipients. The EPA project officer's involvement may include reviewing and approving the grantee's quality assurance project plans and related documents or verifying that the grantee has met the appropriate quality assurance requirements for quality assurance activities that are conducted pursuant to an EPA-approved quality assurance management plan.

Work Plan

Per 40 C.F.R. § 35.104 and § 35.505, work plans are required as part of grant applications. Further, EPA guidance provides that Agency personnel will review and negotiate the applicant's work plan and ensure that the work plan aligns with the Agency's strategic plan, as required by the Government Performance and Results Act.

Funding Recommendation

EPA Order 5700.7 A1, *Environmental Results under EPA Assistance Agreements*, stipulates that funding recommendations must describe how the project fits within the Agency's strategic plan and identify all applicable EPA strategic goals and objectives. The EPA must ensure that funding recommendations contribute to the Agency's programmatic goals and objectives and demonstrate achievement of environmental results. According to the OBLR, the regional project officer prepares the funding recommendation. Grants offices must return funding recommendations that do not meet the requirements of EPA Order 5700.7 A1.

Grant Monitoring

EPA Order 5700.7 A1 states that post-award monitoring must assess progress in achieving outputs and outcomes in the work plan. The terms and conditions of each grant outline the reporting requirements. Generally, grant recipients are required to submit quarterly or annual reports—usually through the EPA's ACRES database—highlighting work completed using grant funding in the reporting period. Additionally, grant recipients must update ACRES with site-specific details, including sites assessed, contaminants found, sites cleaned up, and other information applicable to their grant. According to the OBLR, the regional project officer holds regular meetings with grant recipients, often conducts site visits, and completes required programmatic monitoring reports.

The EPA Tracks Brownfields Grants and Results in Several Databases

The EPA uses the following databases to track or monitor brownfields grants and results:

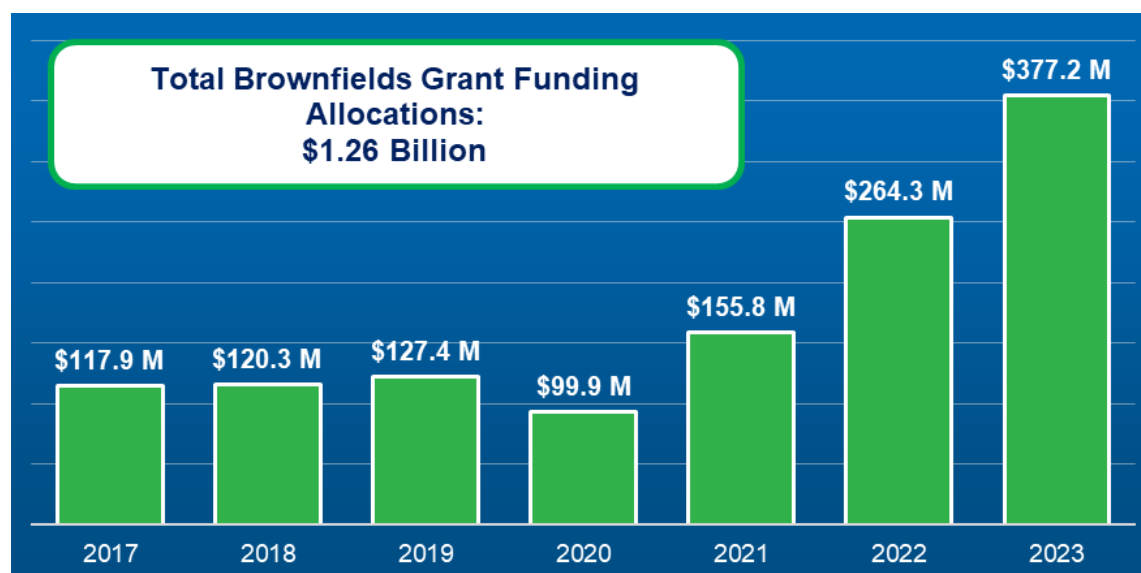
- **The Grant Factsheet Tool:** This public database, managed by the OBLR, shows the selected grant applicants and the anticipated award amounts at the time of selection. The Grant Factsheet Tool is used to announce grant selections to the public but does not track the awarding of grants or the specific dollar amount provided to the recipient.
- **GRIP:** This internal database, managed by the EPA Office of Grants and Debarment, captures grant information for all types of EPA grants. The EPA told us that grants captured in GRIP have been officially awarded.
- **ACRES:** This restricted-access database, managed by the OBLR, tracks specific accomplishments by each grant recipient. Grants without site-specific accomplishments may not be tracked in this database, according to the OBLR.

The Brownfields Program's Funding Allocations

The EPA's Brownfields Program distributes much of its annual appropriations from Congress to fund brownfields activities in communities through grants, including technical assistance grants. We analyzed data in ACRES and GRIP to determine how appropriated funds were allocated among the different types of brownfields grants. Specifically, we determined the (1) total allocations to all types of grants from FY 2017 through 2023, (2) allocations to each type of grant for FYs 2017 through 2023, and (3) total allocations by different EPA offices from FY 2017 through 2023.

As shown in Figure 1, the EPA allocated approximately \$1.26 billion in brownfields grant funding from FY 2017 through 2023.⁸ The funding allocations for FYs 2022 and 2023 were significantly higher than those for prior years because of increased appropriations through the IIJA. The funding allocations for FY 2023 were more than 200 percent higher than the average funding allocations from FY 2017 through 2021.

Figure 1: Total Brownfields Program grant funding allocations, FYs 2017–2023



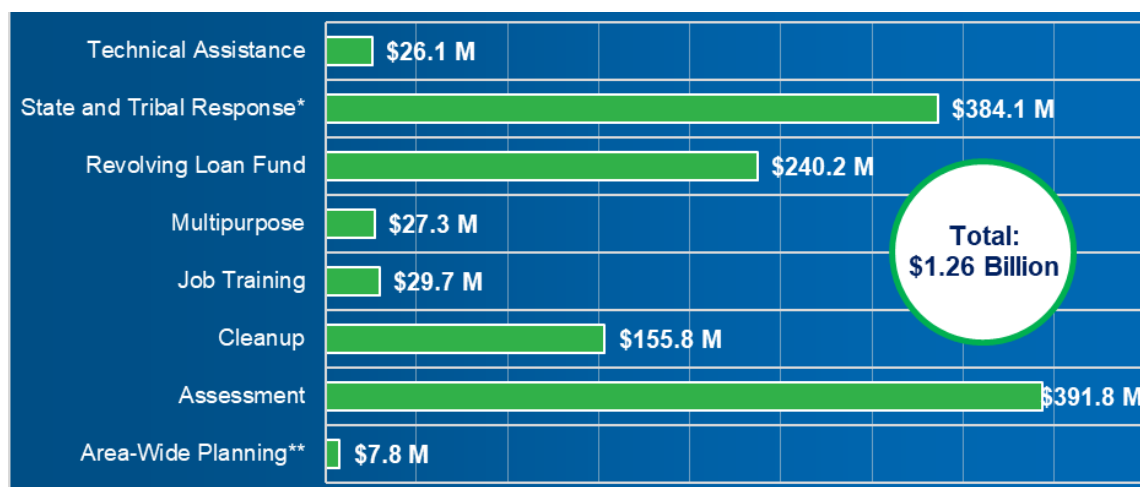
Source: Data from ACRES and GRIP. (EPA OIG image)

Note: M = million.

Figure 2 shows the Brownfields Program allocations by grant type for FYs 2017 through 2023. Of the roughly \$1.26 billion that was awarded during this period, the EPA allocated \$1.17 billion—nearly 93 percent of the funds—to Assessment, Revolving Loan Fund, Cleanup, and section 128(a) State and Tribal Response grants.

⁸ In addition to the grant funding shown in Figures 1–3, the OBLR allocates funding towards contracts and interagency agreements.

Figure 2: Brownfields Program allocations by grant funding type, FYs 2017–2023



Source: Data from ACRES and GRIP. (EPA OIG image)

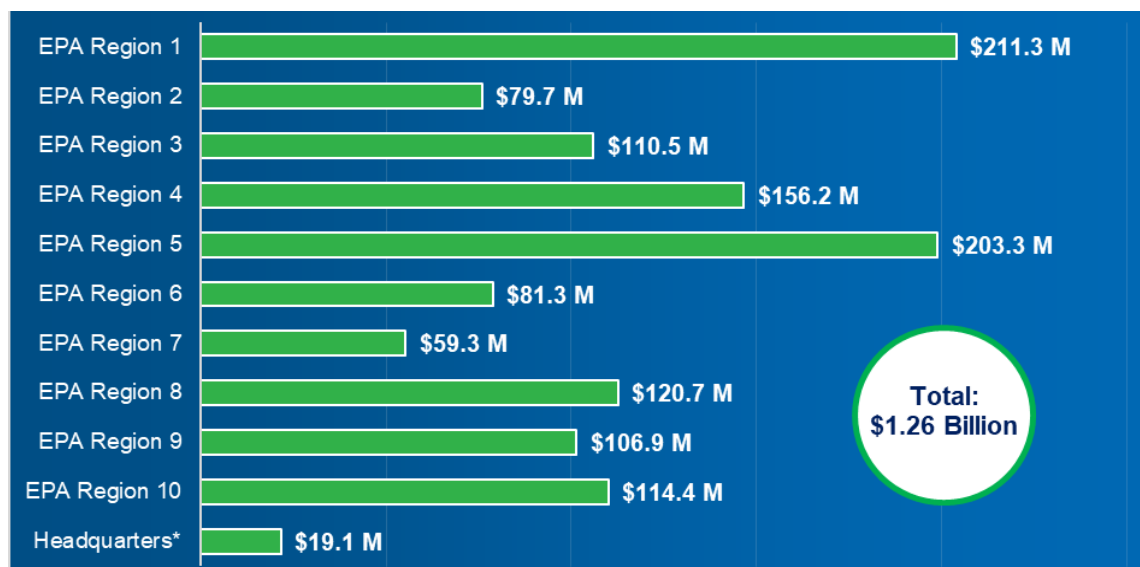
Note: M = million.

* CERCLA section 128(a) state and tribal response programs.

** According to the OBLR, area-wide planning was a grant type awarded in 2010, the grant's pilot year, and then for 2013, 2015, and 2017. The OBLR no longer awards this type of funding.

Figure 3 shows the Brownfields Program's grant funding allocations by EPA office from FY 2017 through 2023. The program distributed the grant funding across each of the ten EPA regional offices and EPA headquarters. Grant recipients in EPA Region 1 received the most funding from FY 2017 through 2023, followed closely by recipients in EPA Region 5.

Figure 3: FYs 2017–2023 brownfields grant funding allocations by EPA office



Source: Data from ACRES and GRIP. (EPA OIG image)

Note: M = million.

* According to the OBLR, "Headquarters" indicates that the project officer resides in the headquarters office and that the OBLR manages the grant. This usually applies to technical assistance grants.

Areas Needing Further Research

During our fieldwork, we identified two areas beyond the scope of our audit objective that may warrant management attention and further research—the EPA’s GRIP database and the monitoring of brownfields grants.

Grants Research Information Portal

The EPA Office of Grants and Debarment developed GRIP to support grants administration and operational reporting. GRIP includes both pre-award and post-award reports data for all EPA grant programs.

Our initial analysis of the EPA’s brownfields grant funding allocations for FYs 2017 through 2023 identified data inaccuracies due to the way GRIP stores and saves data. Specifically, we found problems with GRIP’s date filters, which resulted in our initial analysis missing many grants that were awarded from FY 2017 through 2021. Using GRIP, we found approximately \$900 million in EPA brownfields grant funding allocations for FYs 2017 through 2023 when the actual total using both ACRES and GRIP was more than \$1.26 billion. As a result, GRIP may not be accurate as a stand-alone resource and should be used in combination with ACRES to yield accurate brownfields funding data. We did not analyze other types of EPA grants information in GRIP, but the date filter problems that we identified may impact other grant types and pose difficulties for EPA staff who use the database for grant searches and reporting.

Brownfields Grant Monitoring

As noted earlier, the EPA must monitor grant performance, but this may pose challenges for the EPA given the large increase in funding from the IIJA for brownfields grants. Specifically, the EPA’s brownfields grant funding allocations for FY 2023 were more than 200 percent higher than the average grant funding allocations from FY 2017 through 2021 because of increased program appropriations through the IIJA. But, according to the OBLR, the level of regional FTE employees to oversee and monitor grants has increased by only 44 percent, and this differential will be more pronounced after FY 2026. According to the OBLR, prior to receiving IIJA funding, the Brownfields Program annually managed approximately 1,000 grants nationwide. With additional IIJA appropriations to award more grants, the program anticipates peaking at approximately 1,500 grants annually around FY 2027, and the program anticipates returning to traditional levels around FY 2031.

The OBLR told us that the IIJA funding increased the regional FTE employee ceiling to 156 through FY 2026, and that there is the potential to extend these FTE employees using carryover funds depending on how much IIJA funding is left over and how the EPA Office of the Chief Financial Officer manages these funds. However, the program anticipates having to manage higher workloads from FY 2027 through 2031 with significantly fewer staff due to no longer receiving IIJA funding after FY 2026 but grants remaining open for their full performance period.

As described in Appendix A, grants generally have a performance period of 4–5 years, depending on the grant type. Additionally, the OBLR told us that IIJA funding allowed larger grant awards, enabling

communities to address larger, more complex projects. The OBLR told us that these larger projects may have longer completion times as compared to projects funded at pre-IIJA levels and result in a larger number of recipients requesting period of performance extensions. The OBLR told us that this will add to project officers' annual grant management workloads. As a result, it may be difficult for the regional offices to perform all required grant monitoring activities.

The OIG has initiated audits to look into similar areas of concern. Specifically, the OIG is reviewing post-award oversight of IIJA grants in Project No. OA-FY24-0077 and grant workforce planning efforts in Project No. OA-FY24-0042.

Conclusions

Given the descriptive nature of our objective to address the statutory requirement in the BUILD Act, we do not make any recommendations to the EPA. However, we identified two areas that may warrant management attention and further research.

Agency Response and OIG Assessment

The Agency did not provide a formal response to our draft report, as one was not required. The Agency did, however, provide technical comments and additional documentation to clarify certain aspects of the report. We have reviewed the Agency's technical comments and revised the report where changes were warranted.

Brownfields Program Funding Types

CERCLA section 104(k) Funding Types

Funding type	Description	FY 2017 funding limit and performance period	FY 2023 funding limit and performance period
Assessment grant (competitive)	<p>Assessment grants offer financial support to recipients for tasks such as inventorying, characterizing, and assessing brownfields sites. Assessment grants can also be used for various planning activities, including creating cleanup plans, and for further community engagement for brownfield sites.</p> <p>There are three types of assessment grants:</p> <ul style="list-style-type: none"> • Communitywide. • Assessment coalition. • Communitywide for states and tribes. <p>Communitywide assessment grants are suitable for communities that are beginning to confront brownfields issues or for communities that have already engaged in efforts to transform sites into productive use.</p> <p>Assessment coalition grants enable a lead entity to collaborate with two to four other eligible entities that are incapable of managing EPA cooperative agreements on their own.</p> <p>Communitywide assessment grants are exclusively available to states, tribes, and eligible native corporations in Alaska. The grants enable eligible entities to address brownfield sites across their geographic area of authority.</p>	<p>Communitywide: \$200,000–\$300,000.</p> <p>Assessment coalition: up to \$600,000.</p> <p>Performance Period: 3 years.</p> <p>Note: Communitywide assessment grants for states and tribes were not available in FY 2017.</p>	<p>Communitywide: up to \$500,000.</p> <p>Assessment coalition: up to \$1 million.</p> <p>Performance period: 4 years.</p> <p>Communitywide for states and tribes: up to \$2 million.</p> <p>Performance Period: 5 years.</p>
Cleanup grant (competitive)	<p>Cleanup grants offer financial support to recipients to conduct cleanup activities at brownfield sites they own. The funds can be used to remediate sites contaminated by petroleum, pollutants, or other hazardous substances.</p> <p>Generally, cleanup grant recipients must contribute 20 percent of cleanup costs in a cost-sharing arrangement. The FY 2023 cleanup grant competition did not require cost-sharing due to awards being funded under the IJA.</p>	<p>Up to \$200,000.</p> <p>Performance period: 3 years.</p>	<p>There are three funding tiers for cleanup grants: up to \$500,000 to clean up one brownfield site or to allocate up to \$500,000 among multiple sites, up to \$1 million to clean up one brownfield site or to allocate among multiple sites, and up to \$2 million to clean up one brownfield site or to allocate among multiple sites.</p> <p>Performance period: 4 years.</p>

Funding type	Description	FY 2017 funding limit and performance period	FY 2023 funding limit and performance period
Multipurpose grant (competitive)	<p>Multipurpose grants provide funding for communities to carry out a range of eligible activities in a proposed target area. Examples of eligible activities include cleanup and reuse planning, conducting cleanup activities, and engaging the community.</p> <p>Generally, multipurpose grant recipients must contribute \$40,000 for project activities in a cost-sharing arrangement. The EPA did not require cost sharing for multipurpose grants in FY 2023.</p>	Note: Multipurpose grants were not available in FY 2017.	<p>Up to \$1 million.</p> <p>Performance period: 5 years.</p>
Revolving loan fund grant (competitive)	<p>Revolving loan fund grants allow recipients to establish a revolving loan fund to provide loans and subgrants for brownfield site cleanups.</p> <p>A revolving loan fund grant recipient must use 50 percent or more of the awarded funds for loans.</p> <p>Generally, revolving loan fund grant recipients must contribute 20 percent of project costs in a cost-sharing arrangement. The EPA did not require cost-sharing for revolving loan fund grants in FY 2023 due to awards being funded under the IIJA.</p> <p>Revolving loan fund recipients can request additional funding during the annual supplemental funding process.</p>	<p>Up to \$1 million.</p> <p>Performance period: 5 years.</p>	<p>Up to \$1 million.</p> <p>Performance period: 5 years.</p>
Job training grant (competitive)	<p>Job training grants allow “nonprofits, local governments and other organizations to recruit, train and place unemployed and underemployed residents of areas affected by the presence of brownfields sites,” according to an EPA webpage.</p> <p>These grants support trainings related to brownfields cleanup and remediation, emergency planning and response, stormwater, and environmental health and safety. The grants also enable trainees to obtain full-time positions conducting environmental work.</p> <p>Job training grants are designed to ensure that residents living in their communities benefit from the revitalization and environmental cleanup of brownfields.</p> <p>According to the EPA, as of FY 2023, more than 20,500 individuals completed training and over 15,300 individuals obtained employment in the environmental field, with an average starting wage of nearly \$15 an hour. The cumulative placement rate since inception is 74 percent.</p>	<p>Up to \$200,000.</p> <p>Performance period: 3 years.</p>	<p>Up to \$500,000.</p> <p>Performance period: 5 years.</p>

Funding type	Description	FY 2017 funding limit and performance period	FY 2023 funding limit and performance period
Technical assistance–technical assistance to brownfields communities grant (competitive)	<p>The Technical Assistance to Brownfields Communities Program funds expert organizations from different regions to support communities, states, tribal nations, and other public entities in addressing their brownfield sites. The program also aims to enhance grant recipients' understanding and involvement in brownfields cleanup, revitalization, and reuse. The program complements other initiatives within the Brownfields Program.</p> <p>Technical assistance to brownfields communities grants are offered to eligible entities at no cost. The regionally based expert organizations serve as independent resources to communities, delivering specialized assistance and guidance on topics including:</p> <ul style="list-style-type: none"> • Drafting brownfields grant proposals. • Conducting brownfields site evaluations. • Analyzing historical site data. • Designing site sampling and analysis plans. • Developing cleanup and redevelopment strategies. <p>During FY 2023, five organizations received five-year technical assistance to brownfields communities grants to deliver services directly to communities in their respective geographic regions.</p>	<p>No set funding limit per grant, according to the OBLR. These grants were \$1 million each over 5 years prior to IIJA funding.</p> <p>Performance Period: 5 years.</p>	<p>No set funding limit per grant, according to the OBLR. These grants are for \$5 million over 5 years.</p> <p>Performance Period: 5 years.</p>
Technical assistance–nationwide brownfields technical assistance grant (competitive)	<p>These grants enable nationwide organizations to provide technical assistance to communities. The EPA grantees specialize in topics such as technical assistance to tribes, technical assistance for nonprofits, brownfields land banking strategies, the National Brownfields Training Conference, the Brownfields Revitalization Anti-Displacement Strategies Program, technical assistance to brownfields job training, and brownfields revolving loan fund technical assistance.</p>	<p>No set funding limit or performance period, according to the OBLR.</p> <p>According to the OBLR, these grants vary in amount and performance period based on the nature of the technical assistance, the research being funded, or both the nature of the technical assistance and the research being funded.</p>	<p>No set funding limit or performance period, according to the OBLR.</p> <p>According to the OBLR, these grants vary in amount and performance period based on the nature of the technical assistance, the research being funded, or both the nature of the technical assistance and the research being funded.</p>

Funding type	Description	FY 2017 funding limit and performance period	FY 2023 funding limit and performance period
Technical assistance–targeted brownfields assessment	The Targeted Brownfields Assessment Program assists public entities and nonprofit organizations in assessing potential pollution at brownfield sites, which supports local reuse planning efforts. The program complements other initiatives within the Brownfields Program. An EPA contractor provides targeted brownfield assessment program assistance on behalf of an eligible entity. According to an EPA webpage, the cost of targeted brownfields assessments ranges from \$50,000–\$100,000, but there is no statutory minimum or maximum amount for these assessments. The requester is not responsible for any costs. EPA-contracted environmental consultants, under the oversight of EPA regional targeted brownfields assessment coordinators, conduct the assessments. The program does not provide assistance for cleaning up brownfield sites or razing buildings.	No set funding limit or performance period, according to the OBLR.	No set funding limit or performance period, according to the OBLR.
Technical assistance–land revitalization	Land revitalization technical assistance supports communities by helping them identify viable reuse options for brownfield sites. Potential reuse determinations are based on local conditions, financing resources, and other factors. The community's objectives for site reuse inform decisions regarding assessing, remediating, and safely reusing the brownfield site. Land revitalization technical assistance often complements other types of funding and assistance provided under the Brownfields Program and is provided via an EPA contractor at no cost. Land revitalization technical assistance is intended to assist communities in overcoming brownfield site challenges by gathering information on site and local conditions, designing concepts for revitalization, and identifying resources needed to implement revitalization plans. These site reuse planning activities are used by communities to inform decisions about how to assess and clean up the site.	No set funding limit or performance period, according to the OBLR.	No set funding limit or performance period, according to the OBLR.

Sources: OIG analysis of the following EPA Brownfields Program webpages and documents: the “Brownfields Assessment Grants” [webpage](#), the “Types of Funding” [webpage](#), the *FY2023 Brownfields Grant Guidelines*, the *2023 Brownfields Federal Programs Guide*, the EPA’s cleanup grant [fact sheet](#), the *FY2023 Brownfields Grant Guidelines: A Detailed Review of the Revolving Loan Fund Grant Guidelines* presentation, and the “Brownfields Technical Assistance” [webpage](#). (EPA OIG table)

CERCLA section 128(a) Funding Types

Funding type	Description	FY 2017 funding limit and performance period	FY 2023 funding limit and performance period
State and Tribal Response Program grant	<p>The EPA supports state and tribal response programs through CERCLA section 128(a) funding.</p> <p>According to an EPA webpage, state and tribal response program grants provide financial support to:</p> <ul style="list-style-type: none"> • “Establish or enhance elements of an effective state or tribal response program, as specified in CERCLA Section 128(a). • “Ensure that states and Tribes maintain a public record of sites included in their programs. • “Conduct brownfield site assessments or cleanups that will help establish or enhance the state or Tribe’s environmental response program.” <p>The role of states and tribal nations is to set brownfields cleanup standards and policy and to oversee brownfields site assessment and cleanup activities within their jurisdictions.</p> <p>Pursuant to CERCLA § 128, a state or tribe is permitted to use EPA funds “to capitalize a revolving loan fund for brownfield remediation.”</p>	<p>Up to \$1 million.</p> <p>Performance period: determined by the EPA regional office.</p>	<p>Up to \$1.8 million.</p> <p>Performance period: determined by the EPA regional office.</p>
Technical assistance grant	<p>CERCLA section 128, as amended by the 2018 BUILD Act, authorizes a noncompetitive \$1.5 million technical assistance grant program to assist eligible communities in carrying out brownfield site activities as described in CERCLA section 104(k)(7).</p> <p>CERCLA section 104(k)(7) allows the EPA to fund eligible entities or nonprofit organizations to provide “training, research, and technical assistance to individuals and organizations, as appropriate, to facilitate the inventory of brownfields sites, site assessments, remediation of brownfield sites, community involvement, or site preparation.”</p> <p>The request for funding must be on behalf of a small community, an Indian tribe, or a rural area. One grant can be used to assist multiple eligible communities.</p>	<p>Up to \$20,000 in FY 2019.</p> <p>Performance period: determined by the EPA regional office.</p> <p>Note: Technical assistance grants were not available in FY 2017.</p>	<p>Up to \$20,000.</p> <p>Performance period: determined by the EPA regional office.</p>

Sources: OIG analysis of CERCLA and EPA’s “State and Tribal Response Program” [webpage](#). (EPA OIG table)

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