

**Work plan for the 104 (k) (2) Brownfields Assessment Grant Cooperative Agreement  
Hazardous Substances and Petroleum**

**Energize-ECI Regional Planning District, Inc.  
ECI Brownfields Coalition Grant**  
345 S. High Street, 2nd Floor  
P.O. Box 1912  
Muncie, Indiana 47308-1912

This project supports:

**Environmental Results Goal 4:** Healthy Communities and Ecosystems;

**Objective 4.2:** Communities – Sustain, Clean up, and Restore Communities and the Ecological Systems that Support Them

**Sub objective 4.2.3:** Assess, Clean up, and Redevelop Brownfields

Specifically, the recipient will inventory, characterize, assess, and conduct planning and community involvement activities to encourage revitalization and reuse of brownfields sites.

**The Energize ECI Regional Planning District (E-ECI RPD) will provide the following outputs as a result of this grant funding:**

- Twenty-two Phase I ESAs completed
- Fourteen Phase II ESAs completed
- Six cleanup plans
- Twelve public meetings and a minimum of ten one-on-one meetings with municipalities/townships and community organizations

**Project Contact:** Brad Bookout  
Director of Brownfield Development  
Energize-ECI Regional Planning District, Inc.  
345 South High Street, Second Floor  
P. O. Box 1912  
Muncie, IN 47308-1912  
[contact@energize-ecirpd.org](mailto:contact@energize-ecirpd.org)  
765-808-1484

**Project Period:** **October 1, 2011 – September 30, 2014**

Program Results Code: Hazardous Substances – 402D79 (Action Code: NY)  
Petroleum – 402D79EBP (Action Code: OP)

CFDA: 66.818 The Small Business Liability Relief and Brownfields Revitalization Act  
CERCLA Authority: 104(k)(2)  
DCN: STX  
Budget FY: 11  
Appropriation: E4  
Budget Org: 05F0AG7  
Object Class: 4114

## I. INTRODUCTION AND ENVIRONMENTAL OUTCOMES

The United States Environmental Protection Agency (U.S. EPA) has awarded the Energize ECI Regional Planning District Coalition a Brownfield Assessment Grant of \$609,000 for the assessment of properties community-wide which may be contaminated with hazardous substances and/or petroleum. These funds will be used to create a list of potential brownfields in the community; investigate the historic uses of properties; determine the type, severity, and extent of contaminants; and to develop remediation alternatives that will allow for safe and viable reuse of the properties. The grant will also enable Energize-ECI Regional Planning District to provide public outreach to encourage and facilitate the identification, remediation, and redevelopment of contaminated properties. The tasks and budget for the grant are described in this work plan.

The region is located in northeast Indiana between Indianapolis and Fort Wayne with the State of Ohio forming the eastern boundary with a land area of 1,356 square miles and a population of approximately 218,156. The City of Marion has a population of 30,418 and is the largest city in the ECI Brownfields Coalition. The remaining region is primarily rural with 7 cities, 18 towns and 95 unincorporated communities.

The region continues to face significant challenges in population growth, wealth, per capita incomes, educational attainment, and employment. The State of Indiana has seen population growth of 5.68% from 1999 through 2008 as opposed to our regional decline in populations in Blackford, Delaware, Grant, and Jay counties at losses of -6.53%, -3.26%, -6.48%, and -2.81%, respectively<sup>1</sup>, primarily due to the loss of manufacturing employment. The percentage of our population in poverty<sup>2</sup> averages 15.8% as compared to the State average of 12.9% and national average of 13.2%. Despite the fact that the region is home to a number of universities, only 17.6% of our region's adults have earned a Bachelor of Arts degree, far behind the state average of 19.75%, and nationally at 21.05%<sup>3</sup>. Our region has incurred a 221% increase in unemployment as compared to the National increase of 135% since 2000<sup>4</sup>.

Faced with a growing number of brownfields and suspect sites, the ECI Brownfields Coalition must begin addressing these sites now. Local meetings that have been conducted by E-ECI RPD over the past two years have generated great community interest in dealing with brownfields now.

The Brownfield Assessment grant will have the following outcomes that will be tracked and reported:

- Number of acres cleaned for redevelopment
- Number of sites submitted to State "shovel-ready" program for redevelopment
- Number of acres prepared for recreation or greenspace
- Redevelopment funding leveraged associated with each site re-use
- Number of jobs created by removal of blighted sites or by redevelopment of sites

---

<sup>1</sup> Regional Economic Information System, table CA05N ; (<http://www.census.gov/population/www/censusdata/density.html>)

<sup>2</sup> US Census Bureau, Small Area Income and Poverty Estimates (<http://www.census.gov/did/www/saie/data/statecounty/data/2008.html>)

<sup>3</sup> U.S. Census 2000, Summary File 3, Table P37 - Sex By Educational Attainment For The Population 25 Years and Over

<sup>4</sup> Bureau of Labor Statistics

## II. MANAGEMENT AND COORDINATION

Energize-ECI RPD will take the lead in implementing and managing the Coalition's U.S. EPA Assessment Grant. Brad Bookout, will be the project manager responsible for preparing and submitting all progress reports to the U.S. EPA Project Officer, specifying assessment tasks completed, financial tracking, and proposed grant activities. Energize-ECI RPD will retain a qualified environmental consultant(s) to assist in managing and performing the activities funded by the Assessment Grant. As Project Manager, Mr. Bookout will be responsible for coordination with the Energize-ECI RPD Board of Directors, individual County Commissioners, Local Economic Development Officials (LEDOs) in each County, as well as Mayors offices and town councils within the Coalition counties. He will oversee the work of the consultant(s) and act as a liaison between U.S. EPA, Coalition members, the Counties, communities, the public, property owners, and other stakeholders involved in projects resulting from this grant.

## III. WORK TO BE PERFORMED

The schedule presented in this work plan assumes that the cooperative agreement with the U.S. EPA will be completed and approved by September 30, 2011.

### Task 1 – \$13,000 Programmatic Activities and Community Outreach

Task 1 activities include program development and community outreach. Program Development will require E-ECI RPD staff to set up accounting and project tracking systems, advertise a Request for Qualifications for a qualified brownfields consultant, select and negotiate contract terms with the contract. Program development will include quarterly reporting, accounting, project and deliverables tracking, overseeing the selected environmental consultant, and identifying opportunities for local, state, and federal funding. Reports will be submitted electronically, unless other arrangements are discussed and approved by U.S. EPA. Property profile and/or reporting information will be completed via the ACRES database system for each property where grant funds are expended. Financial reports will be completed and submitted. This task also includes general communication with U.S. EPA about the grant. Community Outreach includes building upon general awareness of brownfield issues in communities (particularly distressed neighborhoods adjacent to the sites) that have identified brownfields, continuing education of our officials in the region, periodic meetings with our partners and community based organizations and developing presentation materials and media releases for program startup and status updates.

Additionally, it is anticipated that staff will attend and/or participate in state, regional, and national brownfields conferences and/or meetings throughout the life of the grant.

TASK 1 ACTIVITIES	DELIVERABLES	DUE DATE
Submit quarterly reports and other documentation to U.S. EPA as required by the Cooperative Agreement	Quarterly reports and other required documentation	January 31, 2012 and then ongoing during the grant period
Prepare and issue Request for Qualifications/Proposal, review consultant submittals, and select environmental consultant(s)	Request for Qualifications/ Proposal document; signed contracts with selected environmental consultant(s)	October 2011
Development of outreach materials for meetings, mailings, etc.	Outreach materials, PowerPoint presentations, FACT sheets	By October 21, 2011 and ongoing throughout Grant Cycle
Hold a total of 36 public meetings (three meetings per county per year) and 30 one-on-one meetings (10 per year)	Sign-in sheets, agendas and minutes detailing public comments	Initial public meeting by October 31, 2011 and ongoing throughout Grant Cycle

**Task 2 – \$10,000 Inventory and Prioritization**

Task 2 includes an ECI Brownfields Coalition inventory, a system for prioritization, and a listing of prioritized sites. This task includes meetings with coalition member counties to identify sites, E-ECI RPD tours and inspections of the sites, and eligibility requests for sites to be assessed with EPA Brownfields funding. Eligibility requests for potential hazardous sites will be submitted to the EPA and eligibility requests for petroleum will be submitted to Indiana Brownfield Program (IBP). The task will also include research of publicly available materials to compile on each site for prioritization purposes.

<b>TASK 2 ACTIVITIES</b>	<b>DELIVERABLES</b>	<b>DUE DATE</b>
Meet with coalition member counties, Local Economic Development Officials, Health Departments, coalition partners to solicit additional sites into coalition inventory	Coalition inventory list	Ongoing throughout Grant cycle
Collect information on potential brownfield sites	Coalition inventory database	Beginning in October 2011 and then ongoing during the grant period
Prioritize sites based upon criteria: job creation, protection of public health due to contaminant release and unsafe structures, and removal of blight. Projects located in areas with development incentives will rank higher for leveraging purposes.	Site selection process documentation	Beginning in November 2011 and then ongoing during the grant period
Determine eligibility of sites-submit hazardous requests to EPA; petroleum requests to Indiana Brownfields Program	Individual eligibility determinations	By December 1, 2011 and ongoing throughout Grant Cycle

**Task 3 – \$529,000 Phase I and Phase II Environmental Site Assessments**

This task includes the Quality Assurance Project Plan (QAPP) and conducting up to 22 Phase I ESAs (12 for hazardous substances and 10 for petroleum substances) and 14 Phase II ESAs (8 for hazardous substances and 6 for petroleum substances).

Phase I reports will be conducted in compliance with E1527-05 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process" or the ASTM E2247-08 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process for Forestland and Rural Property." Phase II reports will be conducted in compliance with ASTM E 1903-97 and the IDEM Risk Integrated System of Closure (RISC) guidance.

This budget also includes coordinating site access, oversight of consultants, development of strategy for each site, ACRES database entry, individual Sampling and Analysis Plans (SAP), Health & Safety Plans (HASP) for EPA review and approval, and request for Comfort Letters/Site Status letters from the Indiana Brownfields Program.

<b>QAPP Activities</b>	<b>Deliverable</b>	<b>Date to be Completed</b>
Conduct pre-QAPP conference call with US EPA QAPP specialist, EPA Project Manager, and selected consultant.	None	October 2011
Submit QAPP for EPA review, comment, and approval	QAPP	December 2011
Prepare Sampling and Analysis Plans (SAPs) <ul style="list-style-type: none"> <li>• Draft</li> <li>• Final, as needed to incorporate USEPA comments</li> </ul>	<ul style="list-style-type: none"> <li>• Draft Site-specific plan(s) to USEPA</li> <li>• Final Site-specific plan(s) to USEPA</li> </ul>	December 2011 and ongoing throughout grant cycle. Provide to USEPA for approval at least 10 working days before planned field work start
Prepare Draft HASP for submittal to US EPA.	Draft HASP	December 2011 and ongoing throughout grant cycle. Provide to USEPA for approval at least 10 working days before planned field work start
Prepare final HASP for submit to US EPA for approval.	Final HASP	On as needed basis throughout CA cycle.

**Task 4 – Cleanup Planning:** The ECI Brownfields Coalition intends to prepare Remedial Action Plans for approximately three properties contaminated with hazardous substances and for approximately three properties contaminated with petroleum. The sites selected for additional funding will offer a high redevelopment potential combined with significant community health, environmental, and economic benefits. The environmental consultant(s) will perform this work under the supervision of Energize-ECI RPD. Taking the step of preparing Remedial Action Plans for the most promising properties will ensure that these sites are ready for a private entity to perform the necessary remediation and redevelopment or for further applications to the EPA or the Indiana Brownfields Program for assistance.

<b>TASK 4 ACTIVITIES</b>	<b>DELIVERABLES</b>	<b>DUE DATE</b>
Prepare draft Remedial Action Plans (RAP) for submittal to the Indiana Brownfields Program for review and approval	Draft RAP and Final RAP	Beginning in June 2012 and then ongoing during the grant period

#### **IV. PROJECT MANAGER PROFILE**

Brad Bookout is the Director of Brownfield Development for the Energize-ECI Regional Planning District. He is dedicated to managing brownfield redevelopment projects in the four county regional area. Brad has significant experience with brownfield assessment, clean-up, and redevelopment projects; conducting competitive procurements; ensuring contract compliance; and meeting the requirements of cooperative agreements. From 1994 to 2009 he owned and operated a private land development and homebuilding business in East Central Indiana. He served for six years as a Delaware County Councilman, with two years as President of the body; he also has served as a member and acting staff person for the Delaware County Redevelopment Commission and Assistant Director of Business Development for the Muncie-Delaware County Economic Development Alliance. He has extensive grant writing and special project financing experience. Within the last two years, Brad secured over \$51 million in grants and special project financing for East Central Indiana and helped to create over 1,300 new jobs.

**V. BUDGET**

**Table 1. Budget for Hazardous Substances Site Assessments**

Budget Categories	Task 1: Programmatic Costs	Task 2: Inventory, Prioritization	Task 3: Phase I & II ESA	Task 4: Cleanup Planning, RAPs	Total
Personnel	\$ 4,000	\$ 4,000	\$ 5,500		\$ 13,500
Travel	\$ 2,000	\$ 500			\$ 2,500
Supplies					
Contractual	\$ 500	\$ 500	\$ 313,000	\$ 28,500	\$ 342,500
<b>Total</b>	<b>\$ 6,500</b>	<b>\$ 5,000</b>	<b>\$ 318,500</b>	<b>\$ 28,500</b>	<b>\$ 358,500</b>

**Task 1 Programmatic Activities and Community Outreach \$6,500 (Hazardous Budget Detail)**

E-ECI RPD has estimated a minimum of 424 hours over the life of the grant of staff time (\$10,000) required to properly manage the EPA Brownfields Program and is requesting 40% from the EPA - \$4,000 (hourly rate of \$23.58) for Director of Brownfield Development. Tasks to be completed by staff include oversight of the consultant for QAPP drafting and timely submission; arranging site access; meetings and oversight of the consultant's work in the field. Property profile forms will be entered by E-ECI RPD into Assessment, Cleanup and Redevelopment Exchange System (ACRES).

Travel Costs are estimated at \$2,000 and include staff travel in the region for training, workshops, or community outreach for the duration of the grant. E-ECI RPD plans to hold 12 public meetings; three in each of the four counties of our coalition. Travel to each meeting will be time consuming for staff, and an average of 65 miles (round trip) per meeting, at a total of 22 meetings will consume the \$2,000 budgeted for travel.

Contractual Costs are estimated at \$500 for the hazardous budget and includes the development of a minimum of four FACT sheets, educating the Committee on eligibility issues and a minimum of six program updates developed by the environmental consultant chosen by E-ECI RPD.

**\$6,500 Budget Breakdown**

**Personnel costs: \$4,000**

Personnel costs (\$23.58 X 169.5 hours) for Director of Brownfields Development - Program Development and Outreach. Tasks to be completed by staff include oversight of the consultant for QAPP drafting and timely submission; arranging site access; meetings and oversight of the consultant's work in the field. Property profile forms will be entered by E-ECI RPD into Assessment, Cleanup and Redevelopment Exchange System (ACRES).

**Travel costs: \$2,000 for staff training, community outreach travel**

National Brownfields Conference \$1400: (air fare/parking at \$350, meals at \$200 (\$50/day), lodging \$600 (3 nights at \$200) with miscellaneous travel costs at \$250); community outreach travel is estimated to be \$600 at IRS rate for mileage (\$0.50) for 1,200 miles throughout the four county area

**Contractual costs: \$500**

Lump sum for development of a minimum of four program fact sheets and a minimum of six presentations

**Task 2 Inventory and Prioritization of Sites \$5,000**

The total \$5,000 hazardous budget includes: a Coalition inventory, a system for prioritization, and a listing of prioritized sites.

Task 2 Personnel Costs: \$4,000 includes meetings with coalition member counties to identify sites, E-ECI RPD tours and inspections of the sites, and eligibility requests for sites to be assessed with EPA Brownfields funding.

Task 2 Travel Costs: \$500 total for travel includes mileage to attend meetings with coalition members, local economic development officials, community officials, property owners, and tours/site inspections of sites that are identified by the coalition in order to develop a comprehensive coalition inventory.

Task 2 Contractual Costs: \$500 includes preliminary environmental research on sites on the inventory and the completion of technical issues associated with eligibility requests.

**\$5,000 Budget Breakdown**

**Personnel costs:** \$4,000

Personnel costs (\$23.58 X 169.5 hours) for Director of Brownfields Development for preparation and attendance at public and on-on-one meetings (132 hours), inspections of potential sites (30 hours), listing and prioritization process (5 hours) and eligibility requests (2.5 hours)

**Travel costs:** \$500 for travel throughout the four county area for a minimum of 22 meetings and numerous site visits with IRS rate for mileage (\$0.50) for 1,000 miles

**Contractual costs:** \$500

Lump sum for assistance with 12 Inventory hours, prioritization, 12 research hours and up to 12 eligibility requests

**Task 3 Phase I and Phase II Investigations \$318,500**

Personnel costs are estimated at \$5,500 for oversight of the consultant for QAPP drafting and timely submission; arranging site access; meetings and oversight of the consultant’s work in the field. Property profile forms will be entered by E-ECI RPD into Assessment, Cleanup and Redevelopment Exchange System (ACRES). The remaining budget is contractual at \$313,000 for the QAPP, 12 Phase I ESAs, and eight Phase II ESAs.

**\$318,500 Budget Breakdown**

**Personnel costs:** \$5,500

Personnel costs (\$23.58 X 233 hours) for Director of Brownfields Development for consultant oversight (150 Hours), coordination with property owners (25 hours), site access (20 hours), strategy meetings (38 hours)

**Contractual costs:** \$313,000 detailed below

<b><u>Task 3 Contractual Activities</u></b>	<b><u>#</u></b>	<b><u>Average Cost</u></b>	<b><u>Total</u></b>	<b><u>Notes</u></b>
Quality Assurance Project Plan	1	\$ 5,000	\$ 5,000	
Phase I (Hazardous) <sup>5</sup>	12	\$ 2,750	\$ 33,000	
Phase II (Hazardous) <sup>6</sup>	8	\$34,375	\$275,000	Includes SAPs, HASPs <sup>5</sup>
<b><u>Subtotal Hazardous</u></b>			<b><u>\$313,000</u></b>	

**Task 4 Cleanup Planning and Remedial Action Plans \$28,500**

Three Remedial Action Plans will be written to meet EPA standards and the IDEM RISC. E-ECI RPD and each community involved in the cleanup planning will work with our partners at the IDEM, Indiana Brownfields Program, and County Health agencies to address community issues or questions regarding re-use of the site. E-ECI RPD will ensure that notification is provided to neighborhood associations, sensitive populations that may be impacted by the cleanup and other stakeholders so that input will reflect the needs and wishes of area residents most impacted by the Brownfields site. ~~E-ECI RPD is contributing 100% personnel costs required (\$4,000) as in-kind staff time for program activities that include coordinating meetings with area residents to discuss the cleanup planning.~~

**\$28,500 Budget Breakdown**

**Contractual costs:** \$28,500 detailed below

<b><u>Task 4 Contractual Activities</u></b>	<b><u>#</u></b>	<b><u>Average Cost</u></b>	<b><u>Total</u></b>	<b><u>Notes</u></b>
3 Remedial Action Plans	3	\$9,500	\$28,500	

<sup>5</sup> SAPs are Sampling and Analysis Plans, HASPs are Health and Safety Plans

**Table 2. Budget for Petroleum Substances Site Assessments**

<b>Budget Categories</b>	<b>Task 1: Programmatic Costs</b>	<b>Task 2: Inventory, Prioritization</b>	<b>Task 3: Phase I &amp; II ESA</b>	<b>Task 4: Cleanup Planning, RAPs</b>	<b>Total</b>
Personnel	\$ 4,000	\$ 4,000	\$ 5,500		\$ 13,500
Travel	\$ 2,000	\$ 500			\$ 2,500
Supplies					
Contractual	\$ 500	\$ 500	\$ 205,000	\$ 28,500	\$ 234,500
<b>Total</b>	<b>\$ 6,500</b>	<b>\$ 5,000</b>	<b>\$ 210,500</b>	<b>\$ 28,500</b>	<b>\$ 250,500</b>

**Task 1 Program Activities and Community Outreach (Petroleum Budget Detail)**

Director of Brownfield Development for oversight of the consultant for QAPP drafting and timely submission (200 hours); arranging site access (74 hours); meetings and oversight of the consultant’s work in the field (150 hours). Property profile forms will be entered by E-ECI RPD into Assessment, Cleanup and Redevelopment Exchange System (ACRES).

Travel Costs are estimated at \$2,000 and include staff attendance and travel in the region for training, workshops, or community outreach for the duration of the grant.

Contractual Costs are estimated at \$500 for the petroleum budget and includes the development of FACT sheets, educating the Committee on eligibility issues and program updates developed by the environmental consultant chosen by E-ECI RPD.

**\$6,500 Budget Breakdown**

**Personnel costs:** \$4,000

Personnel costs (\$23.58 X 169.5 hours) for Director of Brownfield Development for Program Development and Outreach

**Travel costs:** \$2,000 for staff training, community outreach travel

National Brownfields Conference \$1,400: (air fare/parking at \$350, meals at \$200 (\$50/day), lodging \$600 (3 nights at \$200) with miscellaneous travel costs at \$250); community outreach travel is estimated to be \$600 at IRS rate for mileage (\$0.50) for 1,200 miles throughout the four county area

**Contractual costs:** \$500 Lump sum for development of program fact sheets and presentations

**Task 2 Inventory and Prioritization of Sites \$5,000**

The total \$5,000 petroleum budget includes: an ECI Brownfields Coalition inventory, a system for prioritization, and a listing of prioritized sites.

Task 2 Personnel Costs: \$4,000 includes meetings with coalition member counties to identify sites, E-ECI RPD tours and inspections of the sites, and eligibility requests for sites to be assessed with EPA Brownfields funding.

Task 2 Travel Costs: \$500 total for travel includes mileage to attend meetings with coalition members, local economic development officials, community officials, property owners, and tours/site inspections of sites that are identified by the coalition in order to develop a comprehensive coalition inventory.

Task 2 Contractual Costs: \$500 includes preliminary environmental research on sites on the inventory and the completion of technical issues associated with eligibility requests.

**Task 3 Phase I and Phase II Investigations \$210,500**

A minimum of five Phase I Environmental Site Assessments will be conducted for the coalition, with up to 10 Phase I and six Phase II petroleum investigations will be conducted under this budget.

Personnel Costs are estimated at \$5,500 for oversight of the consultant for QAPP drafting and timely submission; arranging site access; meetings and oversight of the consultant's work in the field. Property profile forms will be entered by E-ECI RPD into Assessment, Cleanup and Redevelopment Exchange System (ACRES). The remaining budget is contractual at \$313,000 for the QAPP, 12 Phase I ESAs, and eight Phase II ESAs.

**\$210,500 Budget Breakdown**

**Personnel costs:** \$5,500

Personnel costs (\$23.58 X 233 hours) for Director of Brownfield Development for consultant oversight, coordination with property owners, site access, strategy meetings

**Contractual costs:** \$210,500 detailed below

<b><u>Task 3 Contractual Activities</u></b>	<b><u>#</u></b>	<b><u>Average Cost</u></b>	<b><u>Total</u></b>	<b><u>Notes</u></b>
Phase I (Petroleum)	10	\$ 2,500	\$ 25,000	
Phase II (Petroleum)	6	\$30,000	\$180,000	Includes SAPs, HASPs <sup>6</sup>
<b><u>Subtotal Petroleum</u></b>			<b><u>\$205,000</u></b>	

**Task 4 Cleanup Planning and Remedial Action Plans \$28,500**

Three Remedial Action Plans for petroleum contaminated sites will be written to meet EPA standards and the IDEM RISC. E-ECI RPD and each community involved in the cleanup planning will work with our partners at the IDEM, Indiana Brownfields Program, and county Health Agencies to address community issues or questions regarding re-use of the site. E-ECI RPD will ensure that notification is provided to neighborhood associations, sensitive populations that may be impacted by the cleanup and other stakeholders so that input will reflect the needs and wishes of area residents most impacted by the brownfields site. E-ECI RPD is contributing 100% personnel costs required (\$4,000) as in-kind staff time for program activities that include coordinating meetings with area residents to discuss the cleanup planning.

**\$28,500 Budget Breakdown**

**Contractual costs:** \$28,500 detailed below

<b><u>Task 4 Contractual Activities</u></b>	<b><u>#</u></b>	<b><u>Average Cost</u></b>	<b><u>Total</u></b>	<b><u>Notes</u></b>
3 Remedial Action Plans	3	\$9,500	\$28,500	

<sup>6</sup> SAPs are Sampling and Analysis Plans, HASPs are Health and Safety Plans