

## **THRESHOLD CRITERIA FOR CLEANUP GRANTS:**

### **A. Applicant Eligibility**

The Town of North Brookfield is an open town meeting unit of local government. North Brookfield is eligible to apply and receive EPA funding for Brownfields Cleanup activity. The Town owns the site.

### **B. Letter from State**

A letter from the Commonwealth of Massachusetts Department of Environmental Protection Agency is attached acknowledging the Town of North Brookfield's intent to submit the EPA Clean Up grant proposal and to conduct clean up activities for the 14 South Common Street parcel.

### **C. Site Eligibility and Property Ownership Eligibility**

#### **1) Basic Site Information:**

- a.** 14 South Common Street parcel (now part of the North Brookfield Downtown Development Project)
- b.** 14 South Common Street, North Brookfield, MA 01535
- c.** The Town of North Brookfield, Massachusetts owns the site.

#### **2) Status and History of Contamination at the Site:**

- a.** The site is contaminated by hazardous substances (asbestos).
- b.** This site was formerly part of Aztec Industries, an asbestos product manufacturer for over 60 years that abruptly closed its doors in the mid 1980s. The company filed for bankruptcy protection in 1988, and Town acquired the property by tax taking in 2000. Over the years, with the assistance of state and federal funding, the Town has demolished the buildings that were located on the site, removed underground storage tanks, and cleaned up petroleum contaminated soil. The site is currently unused (fenced off).
- c.** The remaining contamination of concern is asbestos in the soil.
- d.** Former manufacturing activities at the site have resulted in extensive contamination of the site with asbestos. Asbestos-containing debris and asbestos-contaminated soils are located at the ground surface across the site. The site is located within downtown area of North Brookfield with a conflux business and residential homes located adjacent to the site. Remedial actions are needed in order to eliminate potential exposures to asbestos.

#### **3) The Town of North Brookfield affirms that the Site is:**

- a.** NOT listed or proposed for listing on the National Priorities List.
- b.** NOT subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CDRCLA.

- c. NOT subject to the jurisdiction, custody, or control of the United States government.

4) The Town of North Brookfield affirms that the site is:

- a. NOT subject to a CERCLA planned or ongoing removal action
- b. NOT the subject of a unilateral administrative order, court order, or administrative order that has been issued to or entered into by the parties
- c. NOT subject to corrective action under RCRA
- d. NOT a land disposal unit
- e. NOT a portion of a facility at which there have been any releases per TSCA
- f. NOT a portion of a facility for which assistance for response activity has been obtained

5) Environmental Assessment:

The follow assessment and removal activities have been conducted to date:

The EPA Region 1 Emergency Response and Cleanup Services provided building demolition and hazardous materials removal actions in the mid to late 1990s. The EPA under the Superfund Technical Assistant and Response Team activities between October 1996 and January 1997 documented investigative activities and removal actions in various reports.

A Phase I/II environmental site assessment was conducted, in accordance ASTM E1527-97 (equivalent to ASTM E1527-00), in August 1999 for the entire area on which the site is located. This included soil sampling with analysis for asbestos and several other parameters by the Town's licensed environmental consultant (SEA Consultants). At that time, asbestos sample results indicated that the State's reportable quantity of 1 pound of asbestos had been exceeded at the site. Additional test pits in 2003 further delineated the extent of asbestos contamination.

Presently under the coordinated efforts of the EPA and MassDEP, a draft of a Release Abatement Measure Plan (Massachusetts' form of a remedial action plan) has been created. EPA findings through test borings and monitoring well installation and sampling in early 2006 showed there were no other contaminants in the soil or groundwater, thus updating the Phase I and Phase II assessments. Air sampling tests in May of 2006 proved that there were no airborne contaminants under the present, unused conditions. This current status is to determine the most prudent and economical implementation of the cleanup plan.

6) Potential for CERLA §107 Liability:

The Town of North Brookfield acquired the property in August of 2000 through a tax-title foreclosure. Massachusetts General Laws c.21E exempts a municipality from liability when property is acquired in this manner, provided that it did not cause or contribute to the contamination. And, in this case, the Town did not cause or contribute to the contamination, and the Town has maintained the site in a secure manner.

7) Enforcement Actions:

There are no current enforcement actions.

## 8) Information on Liability and Defenses/Protections:

- a. The Town of North Brookfield acquired the property in August of 2000 by a tax taking from the former Aztec Industries, Inc. The Town is the sole owner and there are/were no formal affiliations with the former owners.
- b. All disposal of hazardous substance occurred before the Town acquired the property, and the Town did not cause or contribute to any release of hazardous substances at the site. The Town has not arranged for the disposal nor transported hazardous substances at the site.
- c. The Town of North Brookfield is fully aware of the previous ownership and uses of the property. The Town, with the help of state and federal funds, undertook extensive demolition and cleanup operations (in the buildings) at the site prior to demolition. On behalf of the Town, SEA Consultants of Cambridge, Massachusetts conducted a Phase I Site Assessment in August of 1999, and another report done by SEA in June of 2003 documented the asbestos distribution within the soil (Phase II). SEA has extensive experience with environmental assessment in the State. Additionally, Metcalf & Eddy worked to complete an assessment of the ambient air and to develop remediation action plans. These activities were completed in Spring 2006 under contract to EPA.
- d. The property has remained unused since the Town took ownership in 2000. The Town of North Brookfield has completely enclosed the site with a chain link fence to limit access to the site, and avoid disturbing any asbestos on the surface. No use of the site has been allowed other than access to the town's sewer line and manholes.
- e. As stated above, the Town has taken measures to prevent future releases and limit exposures (fencing, vegetative cover, prohibited use). The Town also confirms our commitment to comply with all land use restrictions and institutional controls; to assist and cooperate with those performing the cleanup and to provide access to the site; comply with all informational requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.

## 9) Petroleum Sites:

This section is not applicable to the 14 South Common Street parcel.

### D. Cleanup Authority and Oversight Structure

#### 1) *Town Oversight of Site Cleanup:*

Preliminary consultations with the remediation process specific to the entire NBDDP site (of which the 14 South Common Street is a part of) have already occurred with the MassDEP. A very positive working relationship has been established with the MassDEP and this was utilized during the creation of the general remediation plan for the entire NBDDP site. The NBDDP site entered into the State of Massachusetts's Voluntary Cleanup Program (VCP) on June 3<sup>rd</sup>, 2008 and was assigned the Release Tracking Number (RTN) 2-0017122. The Town will complete the work under the State's voluntary process under the Massachusetts Contingency Plan (MCP). In addition, the Town has retained a qualified environmental consultant (also known as a licensed site professional (LSP)

in Massachusetts) to oversee and document remediation activities at the site. A LSP is needed for making the necessary submittals under the State program.

## **2) *Adjacent Land Owners:***

Access to other properties is not a concern for this cleanup project. Site control of adjacent properties is held by the town and private property owners who are most favorable towards the remediation of this site and the overall beautification of this section of North Brookfield.

### **E. Cost Share**

The Town is seeking \$200,000 in EPA funding and will match these funds with \$40,000. Due to the size of the Town (less than 5,000 people) and economic needs, it will actively seek other sources of funding to meet this matching criteria and other costs associated with this project. The State of Massachusetts has several programs for which the Town to apply, including a brownfields redevelopment loan program. In conjunction with the above the Town has applied for and successfully achieved a Notice of Funding Authority (NOFA) from the state agency of Massachusetts Development. This \$2,000,000 funding authority is predicated on the ability of the Town to attract legitimate developers that have solid development projects. The funding provided by MassDevelopment can be counted towards the Town's matching criteria as required by the EPA. At a minimum, the Town will take any proceeds from the sale of NBDDP property to fulfill its obligation in meeting the EPA's matching funds requirement. Other sources include in-kind services from its cleanup committee, clean fill being provided by the highway department, and other site work by the town departments.

### **F. Community Notification**

The Town submitted a public notification to the Worcester Telegram & Gazette on October 31, 2008 announcing the review period, comment submittal instructions, and location of this EPA Brownfield's Cleanup grant proposal, as well as the time and location of the public meeting in which the proposal was to be presented and reviewed. A copy of this notification is included in Attachment 1. The grant application was also announced at the Selectmen's meeting held on October 28<sup>th</sup>, 2008; and earlier at the open meeting regarding the feasibility study for the site on August 27, 2008.

The Town held a community meeting on November 10, 2008 at the Senior's Center to present and discuss this Cleanup grant proposal. Public comments solicited from the proposal and the Town's responses to the comments are included in Attachment 1. Notes from the public meeting and the sign-in sheet are also included in Attachment 1.

The Town's website has also contained information specific to site progress including the application (<http://www.northbrookfield.net/nbddp.htm>).

## **RANKING CRITERIA FOR CLEANUP GRANTS:**

The budget prepared for the cleanup of asbestos at the 14 South Common Street parcel of the North Brookfield Downtown Development Project (NBDDP) is partly based on information provided during the preparation of an EPA Targeted Brownfield Assessment. Overall, the cleanup is anticipated to include the placement of an isolation barrier across the site to eliminate potential exposures and migration of asbestos in soil. The funding will be used to support community involvement activities, environmental compliance planning and professional oversight of the remediation, cleanup activities including cap construction, and management of the remedial activities.

### **1. COMMUNITY NEED**

#### **a. Health, Welfare and Environment (8)**

##### Effect of Brownfield on Community:

The 14 South Common Street parcel is a part of the North Brookfield Downtown Development Project (NBDDP) site, which includes the 55 School Street and 10 Grove Street parcels. Together the three parcels compose the NBDDP brownfields site. The Site was formerly home to an asbestos manufacturing plant that employed approximately 50 to 100 people many of which were residents of North Brookfield. This is the Town's largest and most needy brownfields site.

Beyond the NBDDP site, North Brookfield is home to approximately [#] brownfields site, totaling [#] acres. Within a 20-mile radius of the site there are over [#] brownfields site, which includes the communities of Worcester, Palmer, Barre, [more].

##### Health & welfare of sensitive populations in community:

The contaminant of concern at the 14 South Common Street parcel is asbestos. Asbestos fibers remain in the surface and subsurface soil from past manufacturing operations located on the parcel. Asbestos is highly hazardous to human health when inhaled. There are currently no controls other than vegetation and fencing to prevent possible airborne asbestos fibers and direct contact with contaminated soils. Exposure to asbestos can be harmful to human health if asbestos fibers are released into the air when asbestos is disturbed or in poor condition, and these fibers are inhaled into the lungs. Asbestos exposure has been associated with a number of serious health problems and diseases, including asbestosis, lung cancer, and mesothelioma. Potential exposure exists to local adult and child residents, adult workers nearby, and adult/child trespassers since the site is located in the downtown area, with housing and places of business adjacent. There is no safe level of asbestos.

The sensitive populations in the community being most affected by this brownfield site will also benefit the most when the site is cleaned up and redeveloped. The sensitive populations include the residents adjacent to the site (particularly children and the elderly) and the downtown business community, who pass the site on a daily basis. There are several (over 20) residential houses and apartments within 500 feet of the site boundaries. Businesses, including town offices, employ over 500 full and part time workers in nearby buildings, such as the town's main business – a rubber sole factory immediately adjacent to the site with almost 300 workers. The site is located in downtown, literally.

There is a significant number of elderly living in North Brookfield, with the 2000 US Census listing 25.3% of households include at least one individual over the age of 65. And, there are several elderly housing areas adjacent to and near the site. Air borne asbestos can be particularly irritating

(and worse) to older individuals with respiratory issues. Still, asbestos can be harmful to the many people that live nearby and work and visit downtown.

**b. Financial Need (7)**

Brownfields impact on community:

The 2006 US Census reported a population of 4,694 in North Brookfield with the most recent growth being in single-family home construction. Demographic and economic data for the Town is presented in the table below. The median household income in North Brookfield is 12% lower than that for the State of Massachusetts. Currently, the community is comprised of mostly Caucasian race and there are very few people that do not speak English, mostly as a result of North Brookfield remaining a rural town with deep roots back to the first European settlers. However, compared to surrounding communities, the town’s wealth and resources are low as it has a small population and has had limited business growth opportunities.

	North Brookfield	State of Massachusetts	National
% Unemployment	#	5.3	6.1
Median Household Income (2000 census)	\$44,286	\$50,502	\$41,994
% Living Below Poverty Line	4.1 %	#	#
% Non-white	2.35 %	15.5 %	24.6 %
% Renter Occupied Housing Units	29.8 %	35.7 %	30.8 %

Factors Why Additional Resources are Unavailable:

Within the Town there are only two manufacturing activities, one is the world renowned Quabaug Manufacturing Company, makers of the Vibram™ soles used by the United States military for its combat boots. The second major manufacturer is the Chase Precast Corporation, a manufacturer of concrete forms. There are a few other smaller manufacturing entities with the vast majority of remaining businesses being service oriented convenience stores and small restaurants. The addition of new business at the NBDDP will provide additional support to the smaller businesses in the downtown area by increasing the downtown work force and by bringing more costumers/clients to the downtown area. The cleanup of this blighted site will also have a profound effect on the use of the downtown area, as the entire impacted area of 5.35 acres is an eyesore since vegetation has overgrown the dirt, debris, and rusting fence left behind.

There is a major tax benefit to cleanup and redevelopment of the site. The former Aztec Asbestos Manufacturing Company employed approximately 50 to 100 people. Since its closing the Town has lost close to \$10,000 per year in tax revenue and sewer and water charges. This is a large amount of money since the Town only receives only 4% of its revenue from commercial/industrial sites, compared to the average Town in Massachusetts which receives over 26% from commercial/industrial sources. The potential for the development of this site is the creation of new jobs and the rejuvenation of the tax base, which is estimated to replace 2 times the job loss mentioned above, and close to the same tax revenue or more due to higher valuations. There is also the rippling effect on other businesses as the new business brings in people from outside of the community. Located in

the heart of the downtown, this one site and the opportunity to turn it into a viable piece of useable property will have a deep and profound impact on the entire community of North Brookfield.

The cleanup of the 14 South Common Street parcel will also help leverage additional investment and funding for cleanup needs at the remainder of the NBDDP. It is estimated that over \$800K is needed for all the cleanup work within the NBDDP area if it is incorporated into development and construction appropriately. Thus, a \$200K EPA grant for the 14 South Common Street parcel, combined with the cleanup grants being used currently for the 10 Grove Street parcel and 55 School Street parcels, will enable cleanup of almost the entire NBDDP. The town is pursuing other sources of funding and believes that this grant will be a major factor in acquiring the last bit of resources needed for a completed project.

The Town recently voted to construct a much needed Police Station on a section of the NBDDP area. The Police Station is designed to fill almost 1½ acres of the area, leaving 3 to 4 acres undeveloped and still in need of cleanup. Securing funding for the remaining area within the NBDDP is immeasurable, as a mostly cleaned up, larger available area will be much more attractive to developers and yield a greater sale and tax base for the town than would a smaller portion. Additionally, securing funding to clean-up the remaining portion of the NBDDP will save the Town in cleanup costs as the entire area, all three parcels, can be remediated simultaneously. For example, the Town will save on permit costs, contractor fees, and management and oversight by remediating all three parcels at once.

This one major brownfield site has been a long-time health concern and has created an economic lull in the community. The town has worked several years using its resources and those of the state and federal governments to conduct initial cleanups at the site. Because of the positive start to the redevelopment of the NPDDP with recent grants from EPA (Targeted Brownfield Assessment grant) and from regional resources (Central Massachusetts Regional Planning Commission feasibility study), momentum has built in the town for addressing its brownfields. The town's NBDDP Commission has identified and listed a dozen multiple other brownfield sites (note that due to its small size and mostly rural type activities the total number of brownfields are far less than larger communities – but the impact is still high). These have been considered by the Master Plan Committee as a key part of the Town's direction in its Smart Growth efforts.

## **2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS**

### **a. Project Description (10)**

Remediating the 14 South Common Street parcel will turn the unused, undeveloped downtown parcel into a clean, marketable, centrally located real estate property. By cleaning up the parcel first, the parcel will be more attractive to potential developers and will bring new development in North Brookfield sooner. New development into the downtown will yield additional tax revenue for the Town, new jobs for area residents, a renewed sense of community success, and most importantly, a more vibrant downtown community. Having a vibrant downtown area will keep people shopping locally giving them the opportunity to walk more and drive less.

The proposed cleanup plan for the 14 South Common Street parcel includes the placement of an engineered, or isolation, barrier (soil cap) across the site. This remedy was selected as part of a feasibility study prepared by an environmental professional. Site preparation activities would include clearing and grubbing to remove existing vegetation followed by re-grading of the site to fill low spots, evenly distribute future storm water runoff/infiltration, and upgrade the existing sewer line that runs north-south through the property. No excavation is needed, except where large

concrete or wood debris exists and needs to be removed to provide a smoothly graded surface. Limited excavation will also be needed to upgrade existing utilities on the site. Excavation will be conducted in controlled manners as follows: dust controls (water spray) will be applied, dust will be monitored, and excavated materials will be covered until placed back into the excavation. No soil is scheduled for off-site disposal as the isolation barrier will cover the entire site without need for soil removal.

The isolation barrier will consist of various layers such as a geotextile material to prevent deep erosion and act as a future barrier to resist digging, clean gravel and soil to eliminate contact to and releases of asbestos in existing soil, and a vegetative cover to stabilize the soil portion of the cap. Other cap elements will be worked into the remedy during future site development: asphalt pavement and concrete building slabs will become part of the overall cap.

Dust control measures, such as water spray or foams, will be utilized during any activities that cause potential disturbance of asbestos-contaminated soils. Additionally, personal air monitoring will be utilized to protect on-site workers and perimeter air monitoring will be conducted to identify any fugitive emissions of asbestos fibers that could impact workers or residents in the area of the site. Cleanup costs for the entire NBDDP Site may exceed \$800,000, depending on how well the remedy is coordinated with site development. For the 14 South Common Street parcel, costs are anticipated as follows:

Because of its rural location North Brookfield does not have multiple applicants vying for limited land resources, such as in a city environment. Therefore when the opportunity for development of our brownfield site comes along we must grasp it immediately because the next opportunity could be years away. That is why it is so vital to make the NBDDP site useable as soon as possible. This cleanup will provide the momentum needed for North Brookfield to identify and assess other potential brownfield sites.

**b. Budget for EPA Funding and Leveraging Other Resources (10)**

The budget prepared for the cleanup of asbestos at the 14 South Common Street parcel of the North Brookfield Downtown Development Project (NBDDP) is partly based on information provided during the preparation of an EPA Targeted Brownfield Assessment. Overall, the cleanup is anticipated to include the placement of an isolation barrier across the site to eliminate potential exposures and migration of asbestos in soil. The funding will be used to support community involvement activities, environmental compliance planning and professional oversight of the remediation, cleanup activities including cap construction, and management of the remedial activities.

Cleanup Grant Budget:

<b>Budget Categories</b>	<b>Task 1: Remediation Planning</b>	<b>Task 2 Remediation Activities</b>	<b>Task 3: Project Oversight &amp; Reporting</b>	<b>Task 4: Community Involvement</b>	<b>Total Cost</b>
Personnel	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$2,500	\$2,500
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$1,000	\$1,000

Contractual	\$10,000	\$175,000	\$10,000	\$1,500	\$196,500
<b>Total</b>	<b>\$10,000</b>	<b>\$175,000</b>	<b>\$10,000</b>	<b>\$4,500</b>	<b>\$200,000</b>
Cost Share	\$5,000	\$25,000	\$5,000	\$5,000	\$40,000

The following is a description of each task that will be conducted under the cleanup program:

**Task 1: Remediation Planning.** A site remediation plan for the entire NBDDP site has been developed and will be modified for the 14 South Common Street parcel as necessary. Final plans and specifications will be prepared by an environmental professional and will address specific development plans for the NBDDP site. A competitive bidding process will be accomplished to acquire a remedial contractor.

**Task 2: Remediation Activities.** This task includes the anticipated remediation contractor costs for the remediation activities, such as site contouring, placement of the isolation barrier, and site monitoring. Based on a review of other options, the engineered barrier is effective and is the least costly and least intrusive remedy available. Included in the Town's cost share is approximately \$10,000 worth of fill materials to be used for the project.

**Task 3: Project Oversight and Reporting:** Costs are included for this task for having an environmental professional (licensed in Massachusetts) oversee the remedy. It is expected that the environmental professional will also provide support for remedy documentation and guide the Town through the state's voluntary cleanup program.

**Task 4: Public Meetings and Community Involvement:** This task includes notifying adjacent land owners and community based organizations of cleanup schedules, holding an additional public meeting to educate and update the community regarding cleanup and proposed redevelopment activities. It also means holding a final closeout meeting to share the results of the remediation effort. Two meetings in North Brookfield are included in this task. Travel costs are included for attending one EPA instructional meetings and/or conference.

The **cost share** will be provided by the town in the following manners: services and materials. The town has formed a commission (the NBDDP commission) to oversee the cleanup activities, address community relations, and assist with site development and planning needs. The town will also provide clean fill materials that are necessary to help construct the isolation barrier. Together, these efforts are expected to meet or exceed the cost share value. In fact, the NBDDP commission has already been established and is working, and the source of clean fill has been identified.

Leveraging of Additional Resources:

The Town is committed to providing resources and leveraging the funds necessary to complete the remediation of the 14 South Common Street parcel of the NBDDP site. As an entity the Town does not have the financial resources necessary to complete a project as complex and vast as this. When Aztec Industries abruptly closed it left the Town with comparable medical problem to a growing cancer. The Town has an annual budget of just over \$12 million dollars, half of which supports the school system with the rest going to support basic infrastructure Town services. The Town inherently does not have the financial resources to eliminate this burden and health risk without support from outside sources.

The town has committed other resources. These have included the time and expertise of citizens and town officials that serve on the NBDDP Commission and the Master Plan Committee. These

groups have spent countless hours helping to develop cleanup plans, marketing strategies, and community awareness that will ultimately lead to success at this site.

The town has also started to accumulate clean fill from its roadway improvements, construction and highway projects. The fill material has already tested for both chemical contamination and geotechnical characteristics so it is ready to be used in the design of the cap system. The fill will amount to tens of thousands of dollars in resources needed to cap the site.

Additionally, the town is working with the Massachusetts Office of Business Development. This office has committed to assisting the town with the development of incentives for prospective buyers – include tax-increment finance (TIF) and other means to provide buying incentives.

Town has applied for and received additional financial funding from the following sources:

- MassDevelopment – committed a \$2M low interest loan to a qualified developer that the town is actively pursuing. This loan can be used to finalize remediation and start site development.
- Central Massachusetts Regional Planning Commission – the CMRPC has dedicated staff to help the town market the site and open opportunities for development. The CMRPC applied and received \$50,000 for a reuse feasibility study from the Department of Housing and Community Development. This study was used to determine which type of development would be best suited for the site.
- EPA cleanup grant for adjacent parcels – EPA has awarded a cleanup grant for the adjacent parcels, 10 Grove Street and 55 School Street. By combining the 10 Grove Street and 55 School Street parcels with the 14 South Common Street parcel, the site (the NBDDP site) becomes a much larger opportunity for a developer, and thus more likely to be purchased soon. The town has started cleanup and development of the 55 School Street parcel into the new North Brookfield police department building. The NBDDP committee is dedicated to marketing the remaining 2 parcels for redevelopment.
- Sewer enhancements – the town has completed approximately \$40K for the improvements of the sewer line that crosses the site, and serves the general area.

Lastly, it is anticipated that complete cleanup and development will require significant private investment from the future developer. The town has engaged in significant discussions with the neighboring property, Quabaug Corporation, to expand its existing business onto this site. As the largest employer in town, they have indicated their willingness to lease and develop additional business space on the 14 South Common Street parcel.

To help attract a developer such as Quabaug or another company, tax-increment finance (TIF) and/or other Federal and State tax credit programs will be offered to enhance interest and investment.

### **c. Programmatic Capability (20)**

The town will manage the EPA cleanup grant by two means. The NBDDP commission has been established to oversee the grant on the local level. This commission includes personnel with experience in town financing, grant management, business development and engineering. The town has also, through an RFP process, hired a qualified environmental professional. The professional

firm has several years experience with grant management and many years experience with remediation and state regulations.

The town is currently managing an EPA cleanup grant for both the 10 Grove Street and 55 School Street parcels. To date, the work conducted has included the development of engineering specifications, development of a quality assurance project plan, community notification, and site preparation. Once this cleanup grant funding is secured remediation construction activities will begin at the NBDDP site. Working on the three parcels simultaneously will save the Town significant amounts of grant money on project management. The existing EPA grants have helped the town leverage a site reuse feasibility from the CRMPC and a notice of finance availability (loan) from MassDevelopment for a qualified developer.

The Town requires the Town Treasurer and Accountant establish recording and reporting procedures for the management of Federal and State funding. The results have been very positive in producing timely and accurate financial statements and reports required by the funding agencies. The Town has successfully managed two recent Community Development Block Grants, which are federally funded programs administered by the Massachusetts Department of Housing and Community Development. The Town has not received adverse audit findings nor required to comply with special high risk terms and conditions. The town has not been required to comply with special high risk terms and conditions regarding OMB Circular A-102.

The Town of North Brookfield has recently been awarded a cleanup grants for the adjacent properties at 10 Grove Street and 55 School Street. To date, the town has issued several quarterly reports, including the property profile form on the ACRE system. No negative feedback has been received on the quarterly reports, thus is it assumed that full compliance has been met.

### **3. COMMUNITY ENGAGEMENT AND PARTNERSHIPS**

#### **a. Community Engagement Plan (5)**

The town has provided opportunities for the citizens to be heard and to be involved as it has started work on the current NBDDP grants for 10 Grove Street and 55 School Street. The NBDDP Commission will continue to provide means for the community to stay aware of progress, ask questions, provide input, and be involved. For instance, the NBDDP commission is composed of 2 volunteers, plus one selectmen (also volunteering time since town selectmen are not fulltime positions). An information repository has been set up at the selectmen's office and is posted in the town's website, and has been discussed in several open meetings. There is also a committee for the design and construction of the new Police Station that will be placed on part of the site. This committee includes a dozen citizens.

Information will be supplied in English, as it is the primary language of the majority of residents, but translated materials will be available upon request. Two public meetings at the North Brookfield Senior Center are budgeted as part of Task 4 to get the North Brookfield community involved in the cleanup process and reuse planning. The Senior Center is located downtown, just one block away from the NBDDP site.

Based on information received in public meetings attending by the selectmen, the NBDDP Commission and the Master Plan Committee, the entire community of North Brookfield is completely in favor of the rejuvenation of this site as part of a downtown revitalization. An overall unanimous enthusiasm is spurred by parents wanting their children to grow up in a hazard free

environment. This positive attitude is bolstered by both community and business leaders who want to see the Town grow and not have as its moniker “the town with the asbestos dump in it.”

The community has been notified of the proposed plans to cleanup and redevelop the site. Firstly, the town has been fortunate to have assessment conducted at the site and a cleanup grant awarded and started at a neighboring parcels (10 Grove Street and 55 School Street). Thus, there has been significant press in the local and regional news papers for these planning efforts, as well as the planning efforts for the new Police Station that will be integrated into this site. There have also been several public meetings held to discuss the plans, at town meetings, Master Plan Committee meetings, and selectmen meetings. Still, the town has conducted other measures of communication and involvement as follows:

- A dedicated site on the town’s website posts recent articles, cleanup plans, and other related information for the NBDDP;
- The NBDDP Commission was formed and is comprised of one selectman and two town residents (volunteers) to help coordinate the cleanup efforts, property transfer and solicit comments from the public;
- A repository of site information has also been established at the selectmen’s office and is maintained by the administrator;
- Recent articles posted in the area newspapers are posted in the NBDDP portion of the North Brookfield Town website ([www.Northbrookfield.net](http://www.Northbrookfield.net));
- The NBDDP Commission held a public meeting on **November 10<sup>th</sup>, 2008** to discuss this grant application, solicit comments, and update residents on the progress and plans for the NBDDP site.

The method of using multiple means of communication (newspapers, public meetings, website postings, visual sign, and fact sheet distribution) helps deliver the word to more people than using just one method. In a small town like North Brookfield, involving key residents such as those on the NBDDP Commission, the Police Building Committee and the MPC go a long way towards getting the word out and soliciting comments. The younger residents tend to use the internet, thus the website postings provide means to share information with that group. The elder residents use the internet less, on average, and thus newspaper articles and town bulletins provide a means to deliver information to them. The placement of the sign at the site will provide notice to almost all residents, since it is highly likely that most will drive by the site on a daily or weekly basis. Still, progress with work and plans at the site are discussed in public town-related meetings.

The public may issue comments at any time verbally, via mail, or via email to the selectmen’s office. Comments will be addressed via mail or email to record each response. Although the town has a very low number of non-English speaking residents, it will provide interpretation of documents if requested. The same is true for visually-impaired persons.

If the town should be fortunate to be awarded a cleanup grant for the 14 South Common Street parcel, additional community notification will be conducted as follows: articles in the local and regional newspapers will announce the award and provide contact information, a meeting time will be announced to provide a forum for public comment and input, the repository established already will be updated with new information such as updated cleanup plans for the 14 South Common Street parcel, a town bulletin will be distributed to each resident to provide a “fact sheet” with NBDDP progress and upcoming plans for cleanup.

If the Town is awarded this clean up grant, the cleanup work plan and cost analysis for the 14 South Common Street parcel will be available for public comment for 45 days. It should be noted that the town will accept comments at any time, as it advertises the contact information on its website and on the sign to be placed at the site. Comments received on work plans will be responded to in writing by the NBDDP Commission. The responses will be posted on the website and delivered by mail to the commenter. An additional comment period will be initiated for comments on the responses. Additional comments will be addressed until reasonable responses are generated and accepted by the commenter(s).

#### **b. Local, State, & Tribal Partnerships (5)**

The North Brookfield Downtown Development Project is the focal point of the Town's continuing remediation program. Both the Region 1 office of the EPA and the Massachusetts Department of Environmental Protection (MassDEP) have provided tremendous support. Mr. James Byrne of the EPA (617-918-1389) has provided the lead for a Targeted Brownfield Assessment and project guidance regarding the cleanup grants issued for the 10 Grove Street and 55 School Street parcels. Mr. Paul Spano of the MassDEP has provided state regulatory guidance, and has confirmed that he will continue to provide assistance and oversight of work as it progresses under the State's voluntary cleanup program. Also supporting the project are Ms. Shyla Matthews, VP of Community Development for the Massachusetts Development and Finance Agency (MassDevelopment) by providing development assistance in marketing the property; Ms. Claire O'Neill of the Massachusetts Office of Business Development is providing guidance for TIF programs and tax credits. The latter two have confirmed that they will assist the town with its negotiations with the future developer.

The state's program also requires communication with the local Board of Health, thus the local health official involvement is imminent. Each submittal (notification, cleanup plans, semi-annual status reports) is required by these regulations to be copied to the selectmen and the health agent.

The North Brookfield Master Plan Committee also provides guidance in respect to the Town's commitment for planned growth (Mary Walters at (508)-867-4566). This committee, and the cleanup and development of the NBDDP, is also supported further by the Central Massachusetts Regional Planning Commission, who recently offered to assist the town by providing a reuse feasibility study (contact is Tim Hanson at 508-459-3339).

Ultimately, the Town will submit cleanup plans to the State as part of the voluntary cleanup program, guided by the Massachusetts Contingency Plan, or MCP. This program also requires the Town to hire an environmental professional (called a Licensed Site Professional [LSP] in Massachusetts) to oversee the cleanup and documentation of cleanup at the site. The town recently hired an environmental firm with an LSP to assist with the cleanup planning.

#### **c. Community-Based Organizations (5)**

- North Brookfield Downtown Development Project Commission:  
Dave Harris: (508) 867-8692
- North Brookfield Master Plan Committee:  
Mary Walter (508) 867-4763
- North Brookfield Police Building Committee  
Eric Hevy: (508) 854-1998
- CMRPC

#### **4. PROJECT BENEFITS**

##### **a. Welfare and/or Public Health (10)**

One major benefit is site cleanup - the elimination of the threat of release of asbestos fibers to the ambient air. Asbestos is a major contributor to respiratory diseases and cancer, and this site has asbestos across the ground surface and in the soils – which have not been addressed for decades. The cleanup will eliminate the risks associated with the site, and also reduce the concerns that nearby residents and workers have about being near the site. There is no safe level of asbestos.

Potential exposure exists to local adult and child residents, workers nearby, and trespassers since the site is located in the downtown area, with housing and places of business adjacent. Protection of the community and on-site workers during construction is a primary concern. Health and safety measures will be implemented during construction to limit asbestos exposure to workers and the community. All subsurface soil excavations will be thoroughly wetted to limit dust creation. Personal and perimeter air monitoring for dust and asbestos fibers will be undertaken by the remediation contractor for the duration of the onsite construction work. This will ensure that onsite workers, nearby and sensitive populations are protected any airborne asbestos fibers during cleanup activities. The NBDDP site is currently fenced and the fence will be maintained through the use of temporary fencing during all cleanup activities. All unremediated areas will stay fenced until the cleanup is completed. The sign will be 8 feet by 12 feet in size, placed at the corner of the lot facing the street with the most traffic and includes contact information.

Once implemented, the proposed remedy would eliminate the threat of exposure to the asbestos fibers, particularly to sensitive populations like children and the elderly. The cleanup includes placing an isolation barrier across the site, which will include a combination of geotextile materials and clean fill. When future development is implemented, the newly constructed buildings and parking areas will be incorporated into the barrier since concrete slabs and pavement provide acceptable barriers to prevent exposure to the underlying asbestos.

The future uses are anticipated to include municipal (Police Station) and commercial uses. These uses are beneficial to the remedy because they will not provide exurbanite wear of the barrier. That is, parking will be limited to paved areas, and unpaved areas will be limited to walking/sitting uses. By deed transfer, the engineering controls will be maintained by the new owner and overseen by the town. This requirement will also be recorded in the registry of deeds per state remediation requirements. The combination of maintenance of the earthen isolation barrier, maintenance of pavement, and building slabs will prevent future exposures to the asbestos in soil at the site.

Because the NBDDP site is located in the heart of the downtown district it will play a vital role in the present creation of the North Brookfield master plan. The NBDDP Commission and the town's Master Plan Committee has been working to include this site in the Town's master plan, and is expected to complete this planning process within the next several months and includes Smart Growth principles. One current proposal includes a walking path and small park area to link the site to the nearby downtown public park, a requirement that the town will include in its RFP process for future property transfer. The town also plans to use a portion of the property taxes to upkeep the park and pathway linking the park to the downtown area. One parcel within the NBDDP site has been selected for the site of the new North Brookfield Police Station. With the construction of the new police station, and the development of the remaining parcels, multiple new jobs will be created

in the short and long term. Short-term job opportunities include site cleanup and construction; long-term job opportunities include police officers, administrative positions, retail jobs, etc.

Still, other ideas are being generated as a result of interaction by these committees with the public. For instance, one recent meeting included invited planners from other towns that have initiated smart growth concepts, including the Central Massachusetts Regional Planning Commission. Comments have been recorded by the NBDDP Commission. As another example of addressing public desires for improvements, the town recently completed a survey sent to all residents. Results have been compiled and reviewed by the MPC for integration into the master plan. Presently visitors and residents can walk the downtown area in approximately 15 minutes. The development of this site will increase pedestrian traffic and bring more business opportunities to existing businesses, easily accessed from most of the downtown and near downtown residents.

## **b. Economic Benefits and/or Greenspace (5)**

### Economic Benefits

This grant will have a direct impact on the Town's economic development. The cleanup of the 14 South Common Street parcel and the remainder of the NBDDP Site will enable development to occur. The NBDDP site redevelopment will provide the underlying support to create new smaller businesses on the site in conjunction with the cornerstone developer. More business to this site will bring more business to the entire downtown area, which will provide support added revenues to the existing small businesses, such as adding more bank customers, general store, and food services, and general foot traffic for the downtown area. Other benefits are as follows:

Expanded tax base: new development on a cleaned-up site will help return the nearly \$10,000 tax base that the former site users brought to the town. There will also be an increased investment, as shown through interest with existing business owners. For instance, one business owner offered to expand its business onto a portion of the site once it's cleaned up.

Job creation: With the combination of all parcels into the 5-plus acre NBDDP site, it is anticipated that at least 20 jobs will be created via proposed reuse scenarios of the North Brookfield police department and new businesses that may be situated there, such as the neighboring business interested in expansion.

Enhanced property values: With the continued blight of the overgrown abandoned site, and the potential health impacts, there is no worse impact on nearby property values. A cleaned-up site will increase value tremendously, and a redeveloped site will provide even greater benefit. Still, with expansion of business and residential units into vacant land space, the site development will reduce the need for over 5 acres of new space, thus keeping more of the town green. The new master plan also addresses plans to monitor and maintain greenspace in the future.

### Non-Economic Benefits

The redevelopment of the NBDDP area will also have non-economic impacts for the Town. Beyond economic inputs to the Town, the redevelopment of the NBDDP Site will preserve open spaces in this small New England town. Additionally, the construction of the new North Brookfield Police department will make North Brookfield a stronger community through an increased sense of public safety and community programming.

Preserving Open Space: The redevelopment will preserve open space by cleaning up and developing on a site that is located in a developed area. Less space will be needed for development in the more rural, or green areas of the town. The Master Plan Committee will track the development of future projects in an effort to meet smart growth ideals, including the maintenance of green space throughout the town. As noted by responses to the town survey, residents feel compelled to limit development to the downtown area to maintain its rural, New England character as much as possible. The Town is also committed to working with the future developer of this site to include public, open space as part of the future site layout, including a walking path linked to the existing public park. The site management will be required as part of site use limitations ultimately borne by the site developer/manager. The RFP process of property transfer will include such a provision.

Enhancing Public Safety and Programming: The construction of the new North Brookfield Police Station on the NBDDP site will not bring additional tax revenue to the Town, instead it will have a much larger and broader impact on the Town. The primary purpose of the Police Department is to provide a high level of safety, security, and service for all members of the community. The Police Department has the direct responsibility for the preservation of the public peace; for the reduction of the opportunity to commit crime; and for the effective delivery of a wide variety of police services. The new, larger Police Department building will allow the department to expand through the creation of more jobs, better facilities, and increased community programming such as providing a training facility and command center if needed. Using this space eliminates the need for the town to purchase new land for the station.

### **c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse (10)**

Cleanup of the 14 South Common portion of the North Brookfield Downtown Development Project site will benefit in many ways, including the sustainable reuse of brownfields. The successful completion of the 14 South Common Street parcel will be a success story for EPA because it will be a showcase for EPA on how brownfields development make big impacts in small towns.

This grant will enable the town to prevent pollution and reduce resource consumption through the site cleanup and the momentum gained by the site development. Examples follow:

Prevent pollution: The site cleanup approach itself will prevent pollution in several ways. The proposed isolation barrier (or cap) will prevent pollution from migrating off-site and prevent people from exposure to asbestos. Also, the cap construction will prevent the unnecessary need to truck thousands of tons of soil to a landfill, by allowing the waste to stay in place, under cover. In addition, the decreased trucking eliminates the fuel consumption otherwise needed to haul away the impacted soil. Under future use, the site will employ many people, and provide services to countless others in the downtown area. Thus, it is figured that the site development will reduce commuting time and fuels used by those town residents employed at the new site, plus save time by adding services to the downtown area – allowing people to “park once” for multiple needs.

Prevent brownfields: This successful cleanup will demonstrate that brownfields redevelopment works, providing the momentum and encouragement to develop the other identified brownfield sites in town. Currently, the Master Plan Committee is completing its new master plan that integrates smart growth concepts with the town’s growth direction, including the reuse of brownfield sites. The new master plan provides a new model that will prevent future property abandonment by maintaining a better structured approach to project approvals. The Planning Department will continue to maintain the brownfields inventory to monitor the progress in this regard.

Infrastructure reuse: The 14 South Common Street parcel as well as the entire NBDDP area is located within the reach of many utilities, including sewer and water that already serve the site (for the former buildings that once stood at the site). No new utilities will be required in the street. Thus, little infrastructure updates are needed and no additional maintenance will be required since this area is already serviced by the town.

Fill reuse: No additional fill will be required to be removed from the site based on the preliminary design for an isolation barrier across the site. In fact, the barrier will require materials and thus the town has started to accumulate reusable fill from its road projects to reuse at the site as needed. The reusable, clean fill will not only prevent using clean materials from a clean source, but will be used as part of the town's cost share.

Green Building and Low-Impact Landscaping: The Town will further enhance its resource consumption awareness by requiring green building requirements for any site development forecasted, as outlined in the new master plan with the adoption of smart growth ideas including the construction of the new Police Department building. The Town has hired a licensed architect to design and oversee construction of the police station. Alternative energy uses are being evaluated. In conjunction with Town ordinances, post-remedial storm water at the site will be naturally infiltrated into the ground by design. Low-impact landscaping techniques will be employed in the design, including native plant species and storm water infiltration basins. These green site improvements will be overseen and monitored by the NBDDP Commission and the Planning Department.

#### **d. Measuring Progress (5)**

The key output of this grant will be the cleanup of our 14 South Common Street site, making it and the entire NBDDP site ready and safe for reuse. Progress will be tracked using the work plan developed and submitted to EPA and via the quarterly reports and updated property profile forms. The cleanup will be documented by a remedial action report, which will describe the remediation in detail. This cleanup report will be submitted to the EPA and to the MassDEP as required by the State regulations. This report will also be made available to the public for review and comments in accordance with the community relations plan.

The outcome from this grant will include the eventual development of the entire NBDDP site. Construction of the new police station is slated to start in the spring of 2009. The Town aims to complete remediation of the NBDDP site by September 2010. The remediation will leverage many jobs for construction activities. The redevelopment of the site is aimed to be nearly complete by May 2011 and the facilities constructed will realize local jobs for the community. These jobs will be tracked and reported by the NBDDP commission and eventually the Selectmen's office. The expected number of jobs and tax revenue will exceed what was lost from the previous site use: over 100 new jobs and over \$10,000 in taxes per year. In addition, the eventual site development will increase the revenue to existing downtown businesses by providing more foot traffic, providing more customers from employees and users of the new site, and providing more reasons for people to use and stay in the downtown area.

In addition, another outcome of the EPA cleanup grant will include less greenspace used by providing this brownfield site as a resource for development, other than existing open space in another area of the town. The reuse of existing, developed properties are part of the town's new master plan.