

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. The town owns the site.

B. Letter from State

A letter from the Commonwealth of Massachusetts Department of Environmental Protection (MassDEP) is attached.

C. Site Eligibility and Property Ownership Eligibility

1) *Basic Site Information:*

- a. 55 School Street parcel (part of the area formerly used by Aztec Industries; now referred to as the North Brookfield Downtown Development Project [NBDDP])
- b. 55 School Street, North Brookfield, MA
- c. The town owns the site (same for d.)

2) *Status and History of Contamination:*

- 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 the downtown area of North Brookfield with a conflux of 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...under CERCLA.
- c. NOT subject to the jurisdiction, custody, or control of the U.S. 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 the SWDA.
- 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 from the LUST fund.

5) *Environmental Assessment*

The following assessment and removal activities have been conducted to date at the former Aztec site (of which the 55 School Street parcel was a part of). 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 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 has been created. EPA findings through test borings in early 2006 showed there were no other contaminants in the soil, thus updating the Phase I and Phase II assessments. Air sampling tests in May 2006 proved that there were no airborne contaminants under the present, unused conditions. The current status is preparation of final plans and specifications for cleanup.

6) *Potential for 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.

7) *Enforcement Actions: (none)*

8) *Information on Liability and Defenses:*

- a. The Town of North Brookfield acquired the property in August 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. SEA 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.
- e. 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. 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.

D. Cleanup Authority and Oversight Structure

1) Town Oversight of Site Cleanup:

Preliminary consultations regarding the remediation process have already occurred with the MassDEP specific to the entire NBDDP site (of which the 55 School Street parcel is a part). There is a working relationship between the town and the state. The remediation plan will become the town's submittal as part of the State's voluntary cleanup process. The town will complete the work under the State's voluntary process under the Massachusetts Contingency Plan (MCP). In addition, the town will retain a qualified environmental consultant (also known as a licensed site professional (LSP) in Massachusetts) to oversee and document remediation activities at the site (per competitive procurement activities). 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 criterion 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 - Massachusetts Development Finance Agency (MassDevelopment). 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. The town is presently in the process of applying for a \$50,000 feasibility study grant provided by the Department of Housing and Community Development. This money can also be contributed to the town's portion of its matching requirement. 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.

RANKING CRITERIA FOR CLEANUP GRANTS

The budget prepared for the cleanup of asbestos at the *55 School 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.

A. Cleanup Grant Budget

Budget Categories	Task 1: Remediation Planning	Task 2: Remediation Activities	Task 3: Project Oversight & Reporting	Task 4: Community Involvement	Total Cost
Personnel	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$2,000	\$2,000
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$1,000	\$1,000
Contractual	\$10,000	\$176,000	\$10,000	\$1,000	\$197,000
Total	\$10,000	\$176,000	\$10,000	\$4,000	\$200,000
Cost Share	\$5,000	\$29,000	\$5,000	\$1,000	\$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 55 School 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, including provisions to meet the EPA’s utilization goals for disadvantaged businesses.

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.

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: Community Involvement: This task includes notifying adjacent land owners and community based organizations of cleanup schedules, and 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. Travel costs are included for attending EPA instructional meetings and conferences.

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.

B. Community Need

1) Description of the Community:

The community that will benefit from this grant includes several groups: the residents adjacent to the site, the downtown business community, and the entire town itself. There are several (over 20) residential houses and apartments within 500 feet of the site boundaries. Businesses, including town offices, include 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.

The Town of North Brookfield is a small rural community approximately 25 miles west of Worcester, MA built years ago on its agricultural resources. It encompasses an area of 21.1 square miles with a landmass of 12,303 acres. It has 70.35 miles of paved roads and 12 miles of dirt roads. The 2005 annual town census reported a population of 4,687 with the most recent growth being in single-family home construction. The median household income as reported by the 2000 US Census was \$44,286, compared with a state-wide median income of \$50,502. The percentage of families living below the poverty level is 4.1%. 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. Only 8% of tax revenue comes from businesses.

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. Also, there are several elderly housing areas adjacent to and near the site. Air borne asbestos can be particularly irritating and potentially life threatening to older individuals with respiratory issues. Asbestos can also be harmful to the many people that live nearby and work and visit downtown.

As the town attempts to maintain its rural character, it has developed a master plan, which includes proposed development and reuse of its brownfield sites. Cleanup at the 55 School Street parcel will benefit the local residents by limiting growth to rural areas benefit its neighbors, including the elderly, by eliminating health concerns and benefit the local businesses by providing another anchor to its downtown business community.

2) Benefit to the Community:

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 proposed 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.

Another benefit is business growth and sustainability of the downtown. 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 customers/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 are major tax and employment benefits 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 8% of its revenue from commercial/industrial sites. 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 55 School Street parcel will also help leverage additional investment and funding for cleanup needs at the remainder of the NBDDP. It is estimated that over \$700,000 is needed for all the cleanup work. Thus, a \$200,000 EPA grant for the 55 School Street parcel, combined with the \$200,000 cleanup grant being used currently for the 10 Grove Street parcel, will enable cleanup of almost two-thirds of the NBDDP. The town is pursuing other sources of funding and believes that this grant will be a major factor in acquiring the remaining resources needed for a completed project.

As mentioned, the town is currently using a brownfields cleanup grant for cleanup at the 10 Grove Street parcel to start the cleanup process for the NBDDP. Although this progress is long overdue, it will still leave over 3 acres of the NBDDP without cleanup. The power of another grant for the town to cleanup the 55 School Street portion of 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.

3) *Impact of Brownfields:*

This 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 other brownfield sites (note that due to the town's 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 brownfields sites have been considered by the Master Plan Committee as a key part of the town's direction in its Smart Growth efforts.

The Master Plan Committee has taken steps towards its Smart Growth program by adopting the state's smart growth policies and modifying the town's master plan to include these measures. These measures include focusing redevelopment at brownfield sites.

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.

C. Sustainable Reuse of Brownfields

Cleanup of the 55 School portion of the NBDDP site will benefit in many ways, including the sustainable reuse of brownfields in the town. The successful completion of the 55 School 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.

1) *Prevent pollution and reduce resource consumption:*

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 over 100 people, based on planning estimates, 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 objectives, 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 55 School 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 fill will not only prevent using clean materials from a clean source, but will also be used as part of the town's cost share.

Other benefits: In conjunction with town ordinances, post-remedial storm water at the site will be naturally infiltrated into the ground by design. Additionally, native plant species will be returned to a portion of the site. 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. These green site improvements will be overseen and monitored by the NBDDP Commission and the Planning Department.

2) *Economic benefits:*

This grant will have a direct impact on the town's economic development. The cleanup of the 55 School Street parcel will enable development on the site 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 added revenues to the existing small businesses, such as adding more customers, (for bank, general store, food services, etc), and general foot traffic for the downtown area. A recent analysis showed that the percent of tax revenue from businesses has decreased from 16% to 8% over the past decade. 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 is cleaned up.

Job creation: With the combination of all parcels into the 5-plus acre NBDDP site, it is anticipated that at least 100 jobs will be created via proposed reuse scenarios of small offices and service centers such as health clinics, pharmacies, sports complex, and the like.

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.

3) *Vibrant Community:*

Because the NBDDP site is located in the heart of the downtown district, it will play a vital role in the success 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. This planning process is expected to be completed 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 maintain the park and pathway linking the park to the downtown area.

Still, other ideas are being generated as a result of community involvement. For instance, one recent meeting included planners from other towns that have initiated smart growth concepts, including staff from 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 conducted a survey, which was sent to all residents. Results have been compiled and reviewed by the Master Plan Committee for integration into the master plan. The development of this site will increase pedestrian traffic and bring more business opportunities to existing businesses.

D. Creation and/or Preservation of Greenspace/Open Space or Other Nonprofit Purpose

The redevelopment of the NBDDP area will preserve open space by cleaning up and developing a site that is located in a developed area. As a result, 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 the town's 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.

E. Pre-Award Community Notification

1) Describe how the targeted community was or will be notified:

The community has been notified of the proposed plans to cleanup and redevelop the site. Firstly, the town has been fortunate to have had assessment conducted at the site and a cleanup grant awarded and started at a neighboring parcel (10 Grove Street). There has been significant press in the local and regional news papers regarding these activities. There have also been several public meetings held to discuss the plans, including town meetings, Master Plan Committee meetings, and selectmen meetings. In addition, 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 (www.Northbrookfield.net).
- At the recent Master Plan Committee meetings (open to the public) in September and October, the project was discussed in detail and comments were solicited (the town selectmen, Jim Foyle, is acting as the collector of comments).
- 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 comments from the public.
- A sign is being constructed and will be placed at the site to identify the, identify the opportunity for development at the site and provide site information including contact information. 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.
- A repository of site information has also been established at the selectmen's office and is maintained by the administrator.

- The NBDDP Commission has advertised for a public meeting on October 25th, 2007 to update residents on the progress and plans for the NBDDP area, including discussion of this grant application.

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 is awarded a cleanup grant for the 55 School 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 55 School Street parcel, and a town bulletin will be distributed to each resident to provide a "fact sheet" with NBDDP progress and upcoming plans for cleanup.

2) Explain why notification method proposed was/is most appropriate:

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 in the NBDDP 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.

3) How long of a comment period did/do you propose:

For the cleanup of the 10 Grove Street parcel, the town issued a 30-day comment period for the grant work plan and cost analysis. Upon award of the grant for the 55 School Street parcel, the town will extend this to 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.

4) What were/are the plans for addressing comments received:

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).

F. Ongoing Community Involvement

1) Plans for involving affected community:

The town has provided opportunities for the citizens to be heard and to be involved since it started work on the 10 Grove Street parcel (See section E.1). 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 currently composed of 3 volunteers, including one selectmen (also volunteering time since town selectmen are not fulltime positions). Community involvement meetings such as the one scheduled for this October 25th will be held to solicit input and questions regarding the site cleanup and development plans. An information repository has been set up at the selectmen's office and is posted in the town's website, and a sign will be placed at the site with contact information.

Based on information received in public meetings attended 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."

A survey was issued to the entire town in 2006. The response was above expectations (35%) and the NBDDP site was listed by a majority of the responders as one of the key opportunities for town growth and improvements.

2) *Partnerships:*

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 grant issued for the 10 Grove Street parcel. Mr. Paul Spano of the MassDEP (508-767-2782) 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; and Ms. Claire O'Neill of the Massachusetts Office of Business Development is providing guidance for tax-increment finance (TIF) programs and tax credits. Ms. Matthews and Ms. O'Neill have confirmed that they will assist the town with its negotiations with the future developer.

The Board of Health has been notified of the project and supports the clean up (it should be noted that the State's cleanup program also mandates that the Board of Health is alerted to site activities). 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).

3) *Communicating progress:*

The town will utilize the NBDDP Commission to record, maintain, and facilitate communications. As mentioned, the community has been notified of the proposed plans to cleanup and redevelop the site (not just the 55 School Street parcel, but the entire 5+ acre NBDDP area). Progress will be communicated as follows:

- The NBDDP Commission will remain as the site cleanup oversight arm, utilizing citizens as part of the commission.

- A dedicated site on the town's website posts recent articles, cleanup plans, and other related information for the NBDDP.
- A sign at the site will be posted and remain until the site is cleaned up. 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.
- A repository of site information will remain available at the selectmen's office.
- Quarterly progress reports will be posted in the local and regional newspapers.
- A town bulletin will be distributed to each resident to provide a "fact sheet" with NBDDP progress and upcoming plans for cleanup.
- The NBDDP Commission will hold periodic public meetings. For instance, a public meeting is scheduled for this October 25th, 2007 to update residents on the progress and plans for the NBDDP area, including discussion of this grant application.

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.

4) *List of Community Based Organizations:*

- North Brookfield Downtown Development Project Commission:
Jim Foyle (508) 867-0200, Jim Metcalf (508)-867-4245, Ray Hebert (617)-482-7080.
- North Brookfield Master Plan Committee:
Mary Walter (508) 867-4763.
- Service Corps of Retired Executives (Worcester, MA chapter):
Jim Metcalf (508)-867-4245.

G. Reduction of Threats to Human Health and Environment

1) *Identification and/or reduction of threats to human health and the environment:*

Asbestos debris and unconsolidated asbestos fibers are present in surface and subsurface soils across the site. 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 adjacent housing and places of business. There is no safe level of asbestos.

Once implemented, the proposed remedy would eliminate the threat of exposure to the asbestos fibers. 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 retail and commercial uses. These uses are beneficial to the remedy because they will not provide excessive 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 construction of building slabs will prevent future exposures to the asbestos in soil at the site.

2) Describe how you are working with the State and Local environmental authorities:

The North Brookfield Downtown Development Project is the focal point of the town's continuing remediation program. In this regard we have kept very close contact with Paul Spano (508-767-2782) of the MassDEP to assure full compliance with State regulations in seeking a clean bill of health for this site. Mr. Spano has committed to continue his role in helping the town meet state requirements for cleanup.

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]) 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.

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.

3) Describe the proposed cleanup plan for the site:

The proposed cleanup plan for the 55 School 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 55 School Street parcel include the following:

Major Task	Estimated Cost
Site preparation , including erosion controls, clearing, and mobilization of equipment and materials	\$50,000
Construction of engineered barrier , including the placement of the geosynthetic layer and 1.5 feet of clean soil and vegetation. The site will be regraded for improved drainage with appropriate storm water controls	\$400,000
Engineering design, oversight, and project management activities	\$50,000
Total anticipated remedy cost	\$500,000

H. Leveraging of Additional Resources

1) *Identify Funds Committed:*

The town is committed to providing resources and leveraging the funds necessary to complete the remediation of the 55 School 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 cancer in the heart of our downtown business district. Therefore all funding needed to put this cancerous site in remediation needs to come 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 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 – including Tax Increment Financing (TIF) and other means to provide buying incentives.

2) *Ability to Leverage Funds:*

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

- MassDevelopment – committed a \$2 million 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 also recently announced that it is applying for a \$50,000 reuse feasibility study from the Department of Housing and Community Development. This study will be used to determine which type of development would be best suited for the site.
- EPA cleanup grant for adjacent parcel – EPA has awarded a cleanup grant for the adjacent parcel, 10 Grove Street. By combining the 10 Grove Street parcel with the 55 School Street parcel, the site (the NBDDP site) becomes a much larger opportunity for a developer, and thus it becomes more likely to be purchased soon. The town has started cleanup of the adjacent parcel and is committed to marketing the NBDDP site for redevelopment.
- Sewer enhancements – the town has committed approximately \$40,000 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 is currently preparing a request for proposal for the property development, which will be based on the anticipated reuse feasibility study from the CMRPC. To help attract a developer, tax-increment finance (TIF) and/or other Federal and State tax credit programs will be offered to enhance interest and investment.

I. Programmatic Capability

1) *Management & Oversight of EPA Cleanup Grant:*

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 the 10 Grove Street parcel. To date, the work conducted has included the development of engineering specifications, development of a quality assurance project plan, community notification, and site preparation. It is anticipated that the isolation barrier for the 10 Grove Street parcel will be completed this fall. This existing EPA grant has helped the town leverage a site reuse feasibility study from the CRMPC and a notice of finance availability (loan) from MassDevelopment for a qualified developer. Still, this EPA cleanup grant will provide a tremendous head start towards the cleanup of the 55 School Street parcel.

2) *History of Managing Federal Funding:*

The town requires the town Treasurer and Accountant to 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.

3) *Compliance with quarterly reports:*

The Town of North Brookfield has recently been awarded a cleanup grant for the adjacent property at 10 Grove 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 it is assumed that full compliance has been met.

4) *Plans for tracking and measuring progress:*

The key output of this grant will be the cleanup of our 55 School Street site, making it and the NBDDP site developer 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. The development will leverage many jobs for construction activities, 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 50 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 consumption of greenspace by providing this brownfield site as a resource for development, rather than existing open space in another area of the town. The reuse of existing, developed properties is part of the town's new master plan and its adoption of Smart Growth concepts.

This relatively small project will result in a big success story for the town, its partners, and EPA.