



**TOWN OF THOMASTON**  
13 VALLEY STREET  
THOMASTON, MAINE 04861  
TEL: (207) 354-6107

**Narrative Information Sheet**  
**EPA FY2024 Brownfields Community-Wide Assessment Grant Application**  
**Town of Thomaston, Maine**

1. Applicant Identification: Town of Thomaston, Maine  
13 Valley Street  
Thomaston, Maine 04861
2. Funding Requested
  - a. Assessment Grant Type: Community-Wide
  - b. Federal Funds Requested: \$500,000
3. Location
  - a. City: Thomaston
  - b. County: Knox County
  - c. State: Maine
4. Target Area and Priority Site Information
  - a. Target Area(s): Riverfront and U.S. Route One Corridor
  - b. Census Tract Number: Census Tract/Blockgroup 230139704023 and 230139704022
  - c. Address of Priority Sites:
    - i. Kiln Parcel, No Street Address, Intersection of Wadsworth and Water Street, (Lot 55, Map 101), Thomaston, Maine
    - ii. Dragon Cement, 107 New County Road (Route One), Thomaston, ME 04861
5. Contacts:
  - a. Project Director: John Fancy, Project Planner, 13 Valley Street, Thomaston, Maine, 04861; 207-382-8320; [jfancy@thomastonmaine.gov](mailto:jfancy@thomastonmaine.gov)
  - b. Chief Executive/Highest Ranking Official: Kara George, Town Manager, 13 Valley Street, Thomaston, Maine, 04861; 207-354-6107; [kgeorge@thomastonmaine.gov](mailto:kgeorge@thomastonmaine.gov)
6. Population: The Town of Thomaston has a population of 2,739 (2020 Census).



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7. Other Factors:

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	NA
The priority site(s) is impacted by mine-scarred land.	2, 3
The priority site(s) is adjacent to a body of water (i.e., the border of the priority site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1, 2, 3
The priority site(s) is in a federally designated flood plain.	NA
The reuse of the priority site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the priority site(s) will incorporate energy efficiency measures.	3
30% or more of the overall project budget will be spent on eligible reuse/area-wide planning activities, as described in Section I.A., for priority site(s) within the target area.	NA
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	NA

8. Letter from State or Tribal Environmental Authority: Attached

9. Releasing Copies of Applications: Not Applicable - No portions of this application are confidential, privileged or sensitive.

**NARRATIVE INFORMATION SHEET  
ATTACHMENT**

**Letter from State or Tribal Environmental Authority**

**Town of Thomaston, Maine**

**U.S. EPA FY2024 Brownfields Assessment Grant Application**



JANET T. MILLS  
GOVERNOR

STATE OF MAINE  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM  
COMMISSIONER

November 1, 2023

Town of Thomaston  
Attn: Kara George  
13 Valley Street  
Thomaston, ME 04861

Dear Kara George:

The Maine Department of Environmental Protection (Department) acknowledges that the Town of Thomaston plans to conduct assessments of brownfields sites and is applying for an FY24 Environmental Protection Agency (EPA) Brownfields Assessment Grant.

Kara George of the Town of Thomaston has developed an application requesting federal Brownfields Site Assessment Grant funding to assess Brownfields sites in the Town.

If the Town of Thomaston receives funding, the Department will assign project management staff to conduct eligibility determinations and provide review and comment on all assessments, workplans, quality assurance plans, and health and safety plans. For sites where cleanup is pursued, the Department's Voluntary Response Action Program (VRAP) staff will provide review and comment on investigation reports and remedial workplans, and will provide oversight, as necessary, of their contractor's work at the properties. Upon successful completion of remedial activities at a property, the VRAP will provide protections from Department enforcement actions by issuing a Commissioner's Certificate of Completion.

Please feel free to call me directly at (207) 215-8597 should you have any questions regarding this letter.

Sincerely,

Christopher Redmond  
Department Brownfields Coordinator  
Voluntary Response Action Program Manager  
Bureau of Remediation and Waste Management, Division of Remediation  
Maine Department of Environmental Protection

cc: Katy Deng, EPA Brownfields Region 1

AUGUSTA  
17 STATE HOUSE STATION  
AUGUSTA, MAINE 04333-0017  
(207) 287-7688 FAX: (207) 287-7826

BANGOR  
106 HOGAN ROAD, SUITE 6  
BANGOR, MAINE 04401  
(207) 941-4570 FAX: (207) 941-4584

PORTLAND  
312 CANCO ROAD  
PORTLAND, MAINE 04103  
(207) 822-6300 FAX: (207) 822-6303

PRESQUE ISLE  
1235 CENTRAL DRIVE, SKYWAY PARK  
PRESQUE ISLE, MAINE 04769  
(207) 764-0477 FAX: (207) 760-3143

## **1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

### **a. Target Area and Brownfields**

#### **i. Overview of Brownfields Challenges and Description of Target Area**

Thomaston, Maine (population 2,739 per the 2020 census) was settled in 1763 as a trading post and industrial hub along the St. George River. The town prospered in the early 19th century as a port and shipbuilding center, and other industries followed (sawmills, lime kilns, machine shops, etc.). Countless numbers of wooden vessels were launched from our waterfront, and the town's moniker became "the Town That Went to Sea." Shipbuilding made for a prosperous time; the thriving industry caused an influx of tradesmen and families to our small midcoast town. The early to mid-1900's saw a steep decline in wooden shipbuilding when steam replaced wind power, and most of the stately sailing ships were stripped of their spars and rigging and turned into barges for coal and lumber. At that time, many of the boatyards, shipbuilding facilities, and blacksmiths along our waterfront were shuttered, leading to the loss of hundreds of jobs and a steep decline in the Town's population. This caused many shipyards and industrial facilities to be abandoned or demolished, leaving our formerly thriving riverfront in a state of contaminated and underutilized disrepair. ***As such, one of our Target Areas will be the Riverfront***, specifically, a 0.75-mile stretch between Wadsworth Street and Mill River Park which is characterized by ten Brownfield/industrial marine sites, the municipal boat launch, a railroad depot, and the active Lyman-Morse Boatbuilder.

Today, Thomaston's once legendary boatbuilding industry has dwindled to one lone boat builder. Attempts to bring commercial and light industrial businesses back to the town have been stymied by lack of available land, and/or land with inadequate infrastructure. Without industry or good paying jobs, we followed normal development trends during the 20th century, with commercial/automotive development and sprawl along the heavily traveled U.S. Route One corridor that runs through our historic downtown (designated in the National Register of Historic Places in 1974). Noisy and intrusive truck traffic blights this historic residential neighborhood, and automotive Brownfield Sites mar and contaminate the otherwise picturesque downtown. ***A second Target Area will be the Route One Corridor***, which bisects the Town, includes five dilapidated gas stations/auto repair facilities, and contains one of the Town's Priority Sites – the Dragon Cement Plant – who announced their closure in September of 2023 and intent to lay off 75 workers.

This Brownfield Assessment Grant will facilitate the redevelopment and reuse of contaminated and blighted properties in our Target Areas, with the goal of sustainable redevelopment that creates good paying jobs and the development of workforce/affordable housing. We also intend to use Brownfield funds for cleanup and reuse/redevelopment planning to prepare for the inevitable closure of Dragon Cement, the largest employer, biggest landowner, and highest taxpayer in the Town.

#### **ii. Description of the Priority Brownfield Site(s)**

Our Riverfront Target Area includes nearly 30 acres of industrial, shipbuilding, and 10 Brownfield-type Sites; based on historic use, this area may be contaminated with heavy metals, petroleum constituents, PAHs, or PCBs. This Target Area is adjacent to a densely populated residential neighborhood, the municipal boat launch, and the Mill River Park, a popular destination for bird watchers (and historic location of lime kilns, a shipyard, and a burn dump). For this reason, the likely soil contamination present in our Target Area not only impacts our workers, but also nearby residents, sensitive populations, and visitors to these recreational areas. Soil and groundwater contamination also threatens the waters of the St. George River and the associated fisheries. ***A Priority Site in this area is the Town-owned Kiln Parcel***, a one-acre Site with over 300 feet of frontage on the St. George River. The Site formerly maintained lime kilns (the remains of one are still visible) and is valuable due to its river frontage and potential to be redeveloped into a small public boat launch; however, until Brownfield assessment (and potentially cleanup) can occur, the Site remains underutilized and an exposure risk to residents to use the site as an unofficial dog park.

The Route One Corridor Target Area contains ***the Dragon Cement Company***, a Priority Site that holds significance to the Town and the entire Region. Dragon announced in September of 2023 its intent to shut down operations and lay off all of its approximate 75 workers by the start of 2025. Dragon is the Town's largest landowner, holding 2,915 acres of land in Thomaston valued at \$10.3M; Dragon is also the Town's top taxpayer, providing approximately 20% of the town's tax revenues. Its closing will create significant municipal budget challenges. Dragon maintains several

separate parcels of significance in this Target Area: 1) the main manufacturing site that contains the cement manufacturing plant, smokestack, kilns, silos, and cement waste piles that may take centuries to recycle; 2) the 900+-acre mine-scarred quarry; 3) an 88-acre conservation/redevelopment parcel targeted by the Town for redevelopment due to its proximity to infrastructure and prime redevelopment location; and 4) an undeveloped 20-acre parcel adjacent to an existing municipal workforce/affordable housing development (Stoneybrook Subdivision). If the Town/Dragon could confirm this parcel was free from hazards, the Town's municipal housing project could potentially double in size. These four parcels represent nearly 1,500 acres of prime development along Route One, less than one mile from our historic downtown; however, they may be contaminated with heavy metals and petroleum associated with mining and trucking, pH issues associated with limestone and cement kiln, and physical scarring associated with nearly 100 years of active mining. Dragon's unexpected closing announcement has left the Town in dire need of planning and evaluation to assess potential impacts. If things go well, Dragon-owned parcels could be redeveloped for commercial/industrial purposes, solar arrays, or workforce housing; however, if appropriate planning does not occur, these parcels could remain blighted, contaminated eyesores that prevent area-wide redevelopment. Brownfield funds will be used for redevelopment and reuse planning so the Town can manage the challenges and opportunities that will occur when this hulking industrial site closes.

**iii. Identifying Additional Sites**

The Town will develop an inventory of Sites through windshield surveys, public outreach, Site nomination forms, review of state/federal databases, and input from municipal staff and community organizations. We will develop ranking criteria to prioritize Sites that may include proximity to target areas; availability of infrastructure; potential for job creation; likelihood of redevelopment; creation/preservation of green space; potential for housing; benefit to the community and disadvantaged/underserved communities; protection of natural resources; resiliency to climate change; ability to leverage financial resources, etc. U.S. Census data will be used to determine whether a potential site is located in an underserved community or disadvantaged census tract.

**b. Revitalization of the Target Area**

**i. Reuse Strategy and Alignment with Revitalization Plans**

Brownfield assessment and redevelopment aligns directly with the Town's Comprehensive Plan (updated 2020), which identifies the need for economic growth, the need to attract new businesses to expand the workforce, and creation of housing. This Brownfield program will be a catalyst to achieving our community's vision. There is a significant shortage of land in Town for commercial or light industrial use; Thomaston has a waiting list of businesses that are looking for suitable sites. The only nearby industrial park, in the neighboring City of Rockland, is full and cannot be expanded. As such, the Town's goal is to promote the reuse of Brownfield sites for commercial and light industrial use. The Comp. Plan identifies approx. 60 acres of vacant/temporary-use land in the 'highway commercial district', which, if developed, could add up to \$65M in valuation to the town; this is perfectly in line with the Brownfield Program goals of economic development along the Route One Corridor Target Area. Dragon's closing may also be an opportunity for the Town to acquire or market land for reuse/redevelopment to bolster our commercial/industrial presence. Dragon's land is already served by major infrastructure (3-phase power, public water & sewer, broadband, and appropriate zoning). Making it available for commercial and light industrial development would provide jobs and help keep the local tax rate stable. Some of Dragon's other parcels are greenspace/undeveloped parcels; once Brownfield funds have been used to assess and remediate these spaces, they could be redeveloped into workforce/affordable housing. Also, the sheer volume of land owned by Dragon (nearly 3,000 acres) may provide opportunities for major solar development. Solar development is referenced frequently as a goal in the Town's Comp. Plan; however, due to the lack of available land, the current opportunities for solar development are limited.

Thomaston's 2020 Comp. Plan also highlights the need to maintain/increase public access to the St. George River for recreational activities. The assessment and cleanup of the Kiln Parcel in our Riverfront Target Area will achieve our goal of creating community greenspace and enhanced public access to the river. The Site was acquired from the MaineDOT after a bridge replacement project; once environmental issues have been assessed and mitigated, the Town will create a park and small boat launch. This reuse plan also benefits human health by eliminating exposure risks associated

with contaminated soils, protects the environment by preventing soil contamination from impacting the St. George River, and provides reliance to the Site and surrounding areas from climate change.

ii. Outcomes and Benefits of Reuse Strategy

Completing Brownfields assessment and redevelopment activities will revitalize the Target Areas, promote commercial and light industrial redevelopment, create workforce and affordable housing, spur economic growth and community investment, create new jobs, reduce contamination and blight, and increase the Town's tax base. For the Town-owned Kiln Site, assessment and redevelopment of the Site into a public park and boat launch would also create greenspace, improve climate adaptation/mitigation capacity and resilience by preventing contaminated soils from impacting the St. George River through extreme storm events, rising water levels, or increased precipitation (these benefits would be similar for any Brownfield assessment, cleanup, and redevelopment in our Riverfront Target Area). For the Dragon Site, the importance of the reuse and redevelopment planning cannot be overstated. Without significant assessment and evaluation, without community involvement and investment, and without a viable and sustainable plan, the Dragon Site (including the hazardous stockpiles and kilns, the vast mine scarred land and quarry, and the vacant/underutilized parcels) could be abandoned or redeveloped in a manner which is not in line with the Town's vision or goals. However, with appropriate planning provided by the Brownfield program, the Dragon facilities could offer opportunities to the Town by providing land/acreage for sustainable and appropriate development (commercial/light industrial development or solar arrays on the occupied/Brownfield parcels, and residential redevelopment for the currently undeveloped/wooded parcels).

These opportunities may attract younger professionals to Thomaston, who will take advantage of newly created jobs and affordable housing and will contribute to the revitalization of our Town by increasing our tax base. Redevelopment of certain Dragon parcels may also provide the Town with opportunities for municipal solar development; on this Site and others throughout our Target Areas, we will prioritize Sites for inclusion into the program that have redevelopment plans that incorporate renewable energy from wind, solar, or geothermal energy. Our Brownfield program will assess sites and return distressed, blighted, contaminated, or otherwise underutilized properties back to economic viability, will create much-needed housing, and will greenspace for the public's use and enjoyment.

c. **Strategy for Leveraging Resources**

i. Resources Needed for Site Reuse

If additional assessment is needed, we will utilize EPA Assessment Grants and MEDEP Chapter 128A funding. The Town also has a relationship with the Midcoast Council of Governments, a regional planning commission that is applying for a FY2024 EPA Brownfields Assessment grant and may support additional assessment activities. For cleanup, we will assist Site owners obtain funding through EPA Brownfield Grants or Maine DECD RLF grants/loans. For Site reuse/redevelopment, we will leverage resources from the Thomaston Economic Development Committee who has earmarked funds for economic development activities. The Town will encourage redevelopment through Tax Increment Financing (TIF) programs; the Town already maintains TIFs associated with the Dragon Site and the Downtown area. The Town can also leverage redevelopment resources including Community Development Block Grants and/or Congressional Direct Spending.

ii. Use of Existing Infrastructure

Our Target Areas have the infrastructure to support our assessment and redevelopment strategies and are appropriately zoned to support commercial and light-industrial redevelopment, solar development, and/or residential redevelopment (dependent on area). Brownfield sites will be selected for inclusion into the program, in part, due to their proximity to existing infrastructure, utilities, and public transit. The Dragon Site is already provided with infrastructure including access to major roads, public water, public sewer, 3-phase power and broadband internet. Because Dragon is such a significant user of this infrastructure, these utilities are generally underutilized and have the capacity to handle additional customers. The redevelopment options in our Target Area are endless once the environmental stigma associated with Brownfield Sites and industrial contamination is removed.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **a. Community Need**

#### **i. The Community’s Need for Funding**

Thomaston’s population has been declining for several decades; between 2001 and 2020, the ACS estimates that our population declined by 27%. And many of our 2,739 residents are currently living in poverty. According to the 2021 ACS, the median household income in Thomaston is \$55,922, which is 12% lower than the rest of Knox County and represents the second lowest median income in the County. Approx. 7.7% of our population is living in poverty (one of the highest poverty rates in Knox County), and alarmingly, poverty rates for our elderly population (over 65) nearly doubles to 14.5%.

The Town’s small (and decreasing) population, combined with its small footprint (only about 11 square miles) limits its valuation and places pressure on tax rate. The Town’s mil rate of 17.99 is currently 33% higher than the average for Knox County and 42% higher than the rest of the State. These extreme tax rates discourage in migration, home ownership, and economic revitalization. The high mil rate also prevents the Town from undertaking additional debt service obligations, and continued population decline and resident aging will cause an already small tax base to shrink further. Adding to this issue is the looming closure of Dragon Cement, the Town’s largest taxpayer that currently accounts for 22% of the Town’s tax revenues<sup>1</sup>. The loss of Dragon’s revenues will either reduce the services provided to Thomaston’s elderly, low income and disadvantaged residents, or will result in a significantly higher property tax burden for those populations.

Due to these economic hardships and stress on our limited resources, the Town is unable to divert resources to perform Brownfield assessment and redevelopment activities, or to address the potential impacted associated with the inevitable closure of Dragon Cement. Thomaston is not a federal entitlement community, meaning it must compete with other communities for federal economic development money through CDBG programs. This Brownfields program will meet the needs of our Town by leveraging financial assistance to clean up blighted properties, increasing property values in the vicinity of redeveloped Brownfield Sites, and bringing business and good paying jobs to Town.

#### **ii. Threats to Sensitive Populations**

##### **(1) Health or Welfare of Sensitive Populations**

The vulnerable and disadvantaged groups residing in our Target Areas includes the elderly and those living in poverty. Census data shows that our population is aging, with the median age rising from 35.6 years in 1990 to an estimated 55.1 years in 2021; currently, nearly 30% of our population is older than 65. Additionally, 2021 ACS data suggests that approx. 7.7% of our population lives in poverty, and for those older than 65, the poverty rate nearly doubles to 14.5%. An older population, especially those living in poverty, can be a financial burden on a Town, as those populations require additional and specialized health care services, emergency medical services, public transportation, and assisted living and home care services. This consumes a greater portion of the municipal budget than in a larger community. Thomaston currently has no assisted living units nor any housing for middle- to high-income seniors; and the one assisted living facility for low-income seniors is in our Route One Target Area, less than a half mile from Dragon Cement. Due to their low incomes, and the lack of clean and safe housing, these sensitive populations are forced to live in housing units which are in close proximity to hazardous waste and Brownfields Sites. Low-income individuals also pay a disproportionate share of their income toward healthcare; adding environmental contaminants to their healthcare concerns can overly burdensome.

Because of our aging population, the Town will need low-cost housing options as low-income seniors transition out of their homes. Without deliberate investment in affordable senior housing—which can be orchestrated through this Brownfield program—Thomaston is likely to experience an out-migration of older residents seeking alternative housing. Lack of housing stock contributes to this issue. More than 80% of Thomaston’s housing units were built prior to 1900, compared to only 5% built since 2000, and there have been no multifamily housing construction since 2004. Brownfield cleanup and redevelopment can improve the health and welfare of our residents by cleaning up environmental contamination and facilitating the construction of safe and affordable housing units.

##### **(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions**

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<sup>1</sup> Town of Thomaston Comprehensive Plan, 2020



The sensitive populations in our Target Areas (elderly and low-income) are disproportionately impacted by environmental contamination due to Brownfield sites. Due to low incomes and the lack of safe, affordable housing, residents are forced to live in or near historic industrial neighborhoods such as the Riverfront Target Area, along the heavily traveled and petroleum-contaminated Route One Corridor, or in proximity to the Dragon Cement Plant. In particular, the Dragon Site creates concerns about air quality in our Route One Corridor Target Area. Concrete manufacturing can generate dust, respirable crystalline silica (RCS), and airborne metals at hazardous concentrations. OSHA identifies RCS as a carcinogen which can lead to silicosis, chronic obstructive pulmonary disease (COPD), and kidney disease. According to Dragon’s MEDEP Air Emission License<sup>2</sup>, they are categorized as a “Major Source” for hazardous air pollution having the potential to emit more than 100 tons per year (TPY) each of sulfur dioxide, nitrogen oxides, and carbon monoxide; more than 50 TPY of volatile organic compounds; and more than 100,000 TPY of carbon dioxide equivalent. Since 2020, Dragon has been fined more than \$360,000 for safety and health violations<sup>3</sup> and has had numerous air emissions license violations between 2015 and 2021<sup>4</sup>. Violations included exceedances of ammonia emission limits from the manufacturing kiln in 2016, carbon monoxide emissions in 2015 and 2016, particulate releases in 2015, and opacity in 2015, 2016 and 2017<sup>5</sup>.

It is not surprising that EPA EJSscreen reports that individuals in our Target Areas experience higher than average exposures to harmful air quality indexes and exposures (we are in the 87<sup>th</sup> percentile for ozone and 78<sup>th</sup> percentile for exposure to toxic releases to air), and exposures to hazardous materials and sites (63<sup>rd</sup> percentile). According to the MaineCDC, our residents have the highest rate of asthma hospitalizations in Knox County (60.2/10,000 people), which is nearly double the state average (37.1/10,000 people). Thomaston also has COPD hospitalization rates (169.1/10,000 people) that are higher than the state average of 140.8/10,000 people; and the highest rate of heart attack hospitalizations in Knox County (47.5/10,000 people vs. the State average of 45.1/10,000 people)<sup>6</sup>. The Town intends to use Brownfield funds to help guide the reuse and redevelopment of the Dragon Site after its closure in a manner which is sustainable and environmentally conscious, while still providing the Town with much-needed economic development options. Brownfields assessment and redevelopment will improve the health and welfare of the sensitive populations in our Target Area by remediating contaminated media and guiding site redevelopment.

### (3) Environmental Justice

#### (a) Identification of Environmental Justice Issues

Although Thomaston does not contain a disadvantaged census tract (CEJST), the presence of the Dragon Cement Plant and Brownfield Sites creates environmental justice challenges to the sensitive and disadvantaged populations in our Target Areas. Nearly 8% of Thomaston’s population lives in poverty, and that poverty rate nearly doubles to 14.5% for individuals older than 65 (30% of our population is over the age of 65). Our Town currently has only one assisted living facility for low-income seniors, and it is in our Route One Target Area, less than a half mile from the Dragon Cement Plant. Results from a 1996 research journal stated that any area within 2 km of a cement factory would be considered a high danger zone for exposure<sup>7</sup>; this radius represents about 60% of Thomaston’s downtown, and 100% of the Town’s senior living options. Due to the poverty experienced by these sensitive populations, and the lack of clean and safe housing options, they will continue to be forced to live in housing units which are near hazardous waste and Brownfields Sites.

The Maine Housing Authority considers housing “affordable” when a household spends less than 30% of income on housing. The median household income in Thomaston is \$55,922, and the median home price is \$208,000, making home ownership unaffordable to median-income households and most fixed-income seniors. According to Realtor.com, in November 2023, there were only 5 homes for sale in Thomaston; this demonstrates that even if residents could afford to buy a home (which they cannot - none of those homes were “affordable” with the least expensive option at \$279,000),

<sup>2</sup> <https://www.maine.gov/dep/ftp/AIR/licenses/titlev/A0326ERA.pdf>

<sup>3</sup> <https://www.newscentermaine.com/article/news/crime/federal-officials-find-nearly-three-dozen-violations-at-thomaston-cement-company-dragon-products/97-4291ab71-9719-4d87-b720-611d9b11a9a2>

<sup>4</sup> <https://www.penbaypilot.com/article/dragon-plant-closure-harbinger-doom-or-landmark-opportunity/178553>

<sup>5</sup> [https://knox.villagesoup.com/news/state-says-dragon-violated-air-quality-permit-again/article\\_7f4c7de5-af73-5b15-b31d-0ea0dc008f6b.html](https://knox.villagesoup.com/news/state-says-dragon-violated-air-quality-permit-again/article_7f4c7de5-af73-5b15-b31d-0ea0dc008f6b.html)

<sup>6</sup> <https://data.mainepublichealth.gov/tracking/>

<sup>7</sup> <https://scialert.net/abstract/?doi=rjet.2011.203.212>

one would not likely be available. Renting is also not a viable option for our sensitive populations. According to MHA, the average Thomaston rent for a two-bedroom apartment in 2017 was \$958, which was higher than average rents in Knox County; at that time, based on average salaries, any rent above \$812 would have been considered unaffordable. Mirroring the housing shortage, online searches through trulia.com and rentals.com indicate there may only be 4 units available for rent in our Town, with the lowest rent advertised at \$1,200/month. Additionally, the two most “affordable” rental options are located in the Route One Target Area, approximately 1.5 miles from Dragon.

Our residents, especially the elderly and low-income individuals, cannot afford to own homes or rent in Thomaston, forcing them to live in elsewhere, or to pay a much higher percentage of their income towards housing. These impacts have disproportionately impacted low-income families, created a significant environmental justice issue. People are forced to live in the Target Areas, adjacent to contaminated Brownfield Sites, and within a dangerous radius of the emissions from the Dragon Cement plant, because these areas represent a lower cost of living and are some of the only housing options available. Redevelopment and revitalization of our Target Areas, spurred by this Brownfields program will target sites with mixed-use and residential redevelopment potential; will bring good paying jobs, affordable housing, and people back to Thomaston; will spur economic development and improvement of health care services, opportunities, housing, and support amenities.

**(b) Advancing Environmental Justice**

This Brownfield program will promote commercial and light industrial redevelopment to spur economic growth, create workforce/affordable housing, and create new jobs. Sites will be selected for inclusion into the Brownfield program based on their likelihood of successful redevelopment, potential for job creation/retention, potential for housing creation, and benefit to the community and disadvantaged/underserved communities (among other items). The redevelopment of the Dragon Site has the potential to provide the town with much-needed land for commercial and light industrial development reuse, and some of Dragon’s outlying greenspace/undeveloped parcels that could be redeveloped into workforce/affordable housing (including senior assisted living). These redevelopment strategies will bolster the Town’s economy, create jobs, create affordable workforce housing, and provide affordable housing options to low-income seniors. The Brownfield program will not displace any residents or businesses – in fact, the opposite – Brownfields assessment, cleanup and redevelopment will also help keep the local tax rate stable and will allow existing residents and seniors to continue to live in Thomaston due to enhanced safe and affordable housing and senior living options and an increase in the number of jobs.

**b. Community Engagement**

**2.b.i Project Involvement & 2.b.ii Project Roles**

The Town will involve the following community groups in the planning and decision-making process of this Brownfields Program; key members will serve on our Brownfields Advisory Team (BAT).

Name of Organization	Point of Contact	Specific Involvement in the Project
Community Advisory Panel (CAP)/ Georges River Land Trust	Peter Lammert <a href="mailto:plammert@thomastonmaine.gov">plammert@thomastonmaine.gov</a> 207-691-2900	The CAP meets quarterly with officials from Dragon to obtain updates on production plans, safety, issues, and interaction with the community. The CAP in turn, communicates community perspective, issues, and concerns. The CAP will help coordinate with Dragon during reuse planning, will provide feedback on potential Brownfields Sites and outcomes, and will assist with community engagement. Members of the Georges River Land Trust sit on this board and provide input on conservation and water resource protection, as appropriate.
Thomaston Economic Development Committee (TEDC)	Charles Grover [REDACTED] 207-480-0146	The TEDC meets monthly to discuss economic development. Concerns and suggestions are relayed to the Select Board and then discussed during board meetings. The TEDC will assist with Brownfield Site selection, development of Site ranking criteria, and will help guide the Brownfields program in a way that will create economic benefit.

Midcoast Council of Governments (MCCOG)	Mathew Eddy <a href="mailto:meddy@midcoastcog.com">meddy@midcoastcog.com</a> 207-209-4129	The Town is a member of this nonprofit, municipally-driven regional planning and economic development district. MCCOG will assist with community outreach and can advise on redevelopment and reuse strategies, especially for the Dragon Site, since its closing will have regional implications.
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**2.b.iii Incorporating Community Input**

The Town will implement a Community Involvement strategy that involves the targeted community and stakeholders; solicits input from the public; and responds to questions and concerns in a meaningful way. The CAP has years of experience helping Dragon communicate with the community; as such, the CAP will play an integral role in Community Outreach. We will create informational flyers, handouts/brochures, and project summaries to be publicized in the newspaper, our website, and through press releases. We will develop an informational repository on our website which includes outreach materials and updates; this page will include the Town Manager’s and Project Manager’s contact information so the public can ask questions and provide comments. The Town will respond to all emails; responses may also be in the form of face-to-face meetings, targeted marketing materials, or a “Frequently-Asked-Questions” page on our website. The Town publishes a newsletter each month that is posted on our website, Facebook, made available at the Town office, and emailed to citizens. The use of door-to-door visits, community meetings, and flyers will be used to involve our elderly and low-income individuals who may not have internet access. During this Brownfield project, a minimum of four public meetings will be held to present details of the project and to answer questions, receive comments and concerns directly from the public. The Town will translate documents, provide translators, provide document reading services, and providing access to assistive technologies such as teletypewriter relay (TTY) services as needed. We will use the Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants as a resource for alternatives to face-to-face meetings (e.g., zoom meetings, QR codes, flyers, local TV, and radio, as needed).

**3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Description of Tasks/Activities and Outputs**

- i. Project Implementation, 3.b.ii Anticipated Project Schedule, 3.b.iii Task/Activity Lead, & 3.b.iv Outputs

<b>Task/Activity: Cooperative Agreement Oversight (Task 1)</b>
<ul style="list-style-type: none"> <li>i. Project Implementation: <ul style="list-style-type: none"> <li>• EPA-funded tasks/activities: Programmatic oversight; development of a BAT that includes Town, CAP and TEDC members, community organizations, MEDEP, and EPA; developing a request for proposals and selecting a Qualified Environmental Professional (QEP) in accordance with 40 CFR 30; attending the National Brownfield conference; status meetings and communications with project stakeholders; working with the local health agency on health monitoring activities (as appropriate); and tracking grant progress through quarterly reports, MBE/WBE reporting, and the ACRES database. Development of a Brownfields Inventory through public outreach efforts, site nomination forms, review of environmental databases, meetings with community organizations, and windshield surveys; these sites will be prioritized based on their location, potential for economic development, potential for housing, proximity to existing infrastructure, resiliency to climate change, benefit to the community and disadvantaged/sensitive populations, and other criteria with the highest rated sites selected for inclusion into the program.</li> <li>• Non-EPA grant resources needed to carry out task: None</li> </ul> </li> </ul>
<ul style="list-style-type: none"> <li>ii. Anticipated Project Schedule: The BAT will be developed within 1 month; BAT meetings will be held quarterly; a QEP will be selected within 3 months; quarterly reports and ACRES database updates will occur throughout the grant period, and coordination with EPA and MEDEP will be ongoing.</li> </ul>
<ul style="list-style-type: none"> <li>iii. Task/Activity Lead: The Town will oversee this task, with assistance from the BAT and selected QEP. The QEP will prepare quarterly reports and update the ACRES database.</li> </ul>
<ul style="list-style-type: none"> <li>iv. Outputs: A BAT will be developed; a QEP will be selected; QEP contract; regular meetings with the BAT; Brownfields Site inventory; 16 quarterly reports; ACRES inputs/updates.</li> </ul>
<b>Task/Activity: Community Engagement (Task 2)</b>
<ul style="list-style-type: none"> <li>i. Project Implementation:</li> </ul>

<ul style="list-style-type: none"> <li>• EPA-funded tasks/activities: We will develop an informational repository on our website with contact information for the public to ask questions and provide feedback. The Town, BAT, and QEP will hold up to four public meetings - one public meeting will be specific to Dragon Redevelopment planning (Task 4). Meetings will be held with community organizations or individuals, as needed. Meetings will be held in person and via Zoom teleconferencing. We will develop and distribute outreach materials (Site nomination form, informational and outreach brochures, and a FAQ sheet, etc.) to be advertised in the newspaper, on the Town website, Facebook pages, and through press releases.</li> <li>• Non-EPA grant resources needed to carry out task/activity: Community partners will be used to help advertise public meetings and solicit input from the community.</li> </ul>
<p>ii. Anticipated Project Schedule: Community outreach will occur throughout the grant; the first public meeting will occur at project kickoff (Brownfields 101) and to support the Brownfields Inventory. Other public meetings will be held during Sites assessment activities, and during cleanup and reuse planning.</p>
<p>iii. Task/Activity Lead: The Town, with assistance from the BAT/QEP/community partners.</p>
<p>iv. Outputs: Outreach and educational materials, public meeting advertisements, press releases and project update reports, educational materials to support public meetings (PowerPoint presentations and handouts), monthly newsletters. Four public meetings. One-on-one meetings with Site owners/abutters, as needed.</p>
<p><b>Task/Activity: Phase I &amp; Phase II Site Assessments (Task 3)</b></p>
<p>i. Project Implementation</p> <ul style="list-style-type: none"> <li>• EPA-funded tasks/activities: We anticipate up to 8 sites can be entered into the Brownfields Program. For each Site, the QEP will obtain EPA Site eligibility and access agreements from the Site owner; prepare a Phase I ESA in accordance with ASTM E1527-21 and EPA’s “All Appropriate Inquiry”; prepare a SSQAPP for review/approval by the MEDEP and EPA; and conduct a Phase II ESA in accordance with ASTM E1903-11 or equivalent. We anticipate that HBMI’s will be prepared for 5 Sites. Reports/deliverables will be submitted to the Town, EPA, and MEDEP for review and approval. Each site will be submitted to the MEDEP Voluntary Response Action Program (VRAP).</li> <li>• Non-EPA grant resources: None</li> </ul>
<p>ii. Anticipated Project Schedule: Phase I ESAs, SSQAPPs, and Phase II ESAs will be completed throughout the four-year grant cycle. The first Phase I ESA will be completed within 1 month of QEP procurement.</p>
<p>iii. Task/Activity Lead(s): The QEP will oversee this task, with assistance by the Town.</p>
<p>iv. Outputs: 8 EPA eligibility determinations and access agreements, 8 Phase I ESAs, 8 SSQAPPs, 8 Phase II ESAs, 5 HBMI’s, 8 VRAP applications.</p>
<p><b>Task/Activity: Cleanup Planning &amp; Area-Wide Planning/Reuse Planning (Task 4)</b></p>
<p>i. Project Implementation:</p> <ul style="list-style-type: none"> <li>• EPA-funded tasks/activities: Based on results of ESAs, the Town and QEP will determine if cleanup planning is needed; if so, an ABCA/RAP will be prepared which incorporates potential Site reuse and evaluates remedial actions on cost, feasibility, resilience to climate change, and ability to protect human health and the environment. Cleanup costs will be determined. Up to 6 ABCA/RAPs will be prepared. The Town, QEP, and subcontracted planning firms (as needed) will perform Reuse and Redevelopment Planning and conduct a Revitalization Plan for the Dragon Site and/or surrounding areas. During these activities, public outreach will be conducted to solicit input from the public; we envision this meeting as a design charettes to encourage public participation.</li> <li>• Non-EPA grant resources needed to carry out task/activity: None</li> </ul>
<p>ii. Anticipated Project Schedule: ABCA/RAPs will be completed within 1-2 months of final Phase II reports. Reuse and Redevelopment Planning at the Dragon Site will begin immediately once a QEP is selected.</p>
<p>iii. Task/Activity Lead: The QEP will complete ABCA/RAPs. The Town and QEP will oversee the redevelopment and reuse planning, public meetings, and design charettes with assistance from the BAT.</p>
<p>iv. Outputs: Up to six ABCA/RAPs; one public meeting/design charette, associated presentation materials.</p>

**b. Cost Estimates**

A breakdown of cost by task, along with a summary task table, is provided below.

**Task 1 – Cooperative Agreement Oversight:** Includes \$15,730 for program development, reporting/financials, and meetings with stakeholders/BAT (two days per quarter - 256 hours @ \$55/hour = \$14,080) and QEP selection/contracting (30 hours @ \$55/hour = \$1,650); \$1,000 for office/printing supplies; and \$4,800 for two people to attend the National Brownfields Conference (airfare \$500/each, two hotel rooms for four nights @ \$300/night is \$2,400, registration is \$800, and misc. transportation/food is \$600). QEP time estimated at \$9,900, which includes a Brownfields Inventory (\$3,500), quarterly reports and updating ACRES (\$300 per quarter = \$4,800), and meetings with BAT, stakeholders, and regulators (\$1,600). Total Task 1 = \$31,430.

**Task 2 – Community Engagement:** Includes \$10,780 for personnel time for two people to attend quarterly CAP/BAT meetings (96 hours @ \$55/hour = \$5,280), prepare for/attend four public meetings (64 hours @ \$55/hour = \$3,520), and update the website and respond to questions/comments (36 hours @ \$55/hour = \$1,980); and \$1,000 for office/printing supplies. Catering costs (\$200/meeting) and QEP time is estimated at \$12,400, which includes virtual attendance at CAP/BAT meetings (\$300/meeting = \$4,800); preparation/in-person attendance at public meetings (\$900/meeting = \$3,600), and preparation of marketing materials (\$4,000). Total Task 2 = \$28,180.

**Task 3 – Phase I & II Environmental Site Assessments:** Include personnel time to review deliverables (24 hours \$55/hour = \$1,320) and \$640 in office/printing supplies. Includes \$323,900 in QEP time (8 Phase I ESAs @ \$5,000 each; 8 SSQAPPs @ \$3,800 each; 8 Phase II ESAs @ \$28,000 each; 5 HBMIIs @ \$3,500 each; and 8 VRAP applications @ \$1,500 each). Total Task 3 = \$325,860.

**Task 4 – Cleanup/Reuse Planning:** Includes \$14,630 in personnel time for review of ABCA/RAPs (18 hours @ \$55/hour = \$990), two people preparing for/participating in a public meeting/design charette (48 hours at \$55/hour = \$2,640), and leading redevelopment planning for the Dragon Site (200 hours @ \$55/hour = \$11,000). QEP time to complete six ABCA/RAPs (6 x \$8,000/each = \$48,000) and preparing for/attending the public meeting (\$1,900), and \$50,000 for the reuse planning and a subcontracted Revitalization Plan for the Dragon Site. Total Task 4 = \$114,530.

Budget Categories		Project Tasks (\$)				Total
		Task 1 Cooperative Agreement Oversight	Task 2 Community Engagement	Task 3 Phase I & II Assessments	Task 4 Cleanup/ Reuse Planning	
<b>Direct Costs</b>	<b>Personnel</b>	\$15,730	\$10,780	\$1,320	\$14,630	<b>\$42,460</b>
	<b>Fringe Benefits</b>					
	<b>Travel</b>	\$4,800				<b>\$4,800</b>
	<b>Equipment</b>					
	<b>Supplies*</b>	\$1,000	\$1,000	\$640		<b>\$6,640</b>
	<b>Contractual</b>	\$9,900	\$16,400	\$323,900	\$99,900	<b>\$446,100</b>
	<b>Other (specify)</b>					
<b>Total Direct Costs</b>		<b>\$31,430</b>	<b>\$28,180</b>	<b>\$325,860</b>	<b>\$114,530</b>	<b>\$500,000</b>
<b>Indirect Costs</b>		\$0	\$0	\$0	\$0	<b>\$0</b>
<b>Total Budget</b>		<b>\$31,430</b>	<b>\$28,180</b>	<b>\$325,860</b>	<b>\$114,530</b>	<b>\$500,000</b>

**c. Plan to Measure and Evaluate Environmental Progress and Results**

The Town, BAT, and QEP will hold quarterly meetings to review project status, schedule, and budget, and to ensure the overall Brownfield program is on schedule and within budget. The Town and QEP will be in frequent contact with the MEDEP and EPA on Brownfield matters, and all sites selected for the Brownfield program will be entered in the MEDEP VRAP. The Town will oversee the preparation of high-quality Brownfield deliverables (Phase I and II ESAs, SSQAPPs, HBMIIs, ABCA/RAPs, and planning studies) which will be tracked/evaluated by the Town to ensure each deliverable meets stringent QA/QC protocols, and that each is distributed to appropriate stakeholders for review. The ACRES database will be utilized for quarterly reports and to monitor project

progress, deliverables, and outputs (number of sites assessed, acreage, contamination, money spent, leveraged money, job creation, increased tax base, etc.).

**PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

4.a.i Organizational Capacity, 4.a.ii Organizational Structure, & 4.a.iii Description of Key Staff

The Town has extensive experience obtaining and managing federal grants, as well as economic development and infrastructure projects. **John Fancy**, Thomaston Town Planner, has nearly 35 years of experience with the Town, and has managed most of the state/federal grants obtained in this time, including the 2019 construction of a 650,000 kWh, municipally owned, solar array at a cost of \$1,100,000, and an 8-year, \$18M project to construct a new wastewater treatment facility. On these projects, John carried out the programmatic, administrative and financial requirements. Mr. Fancy will act as Program Manager and will have direct oversight and management of this Brownfields Program, ensuring the successful expenditure of grant funds and the completion of deliverables in accordance with EPA requirements. John will be assisted by Jodell Benson, Finance Director, who has handled the finances for all federal municipal grants since 2011, and Kara George, Town Manager, who has 13 years in municipal government experience. She is responsible for overall management of all municipal operations and applied for and managed a recent \$25,000 FEMA Emergency Management Performance Grant to provide a generator for the Emergency Shelter, and a \$5,000 Center for Tech and Civil Life grant for elections.

4.a.iv Acquiring Additional Resources

The Town will utilize a public bidding process to contract an experienced Brownfields QEP to assist with implementation of our Brownfield program. Thomaston routinely performs this type of bidding process, issuing Requests for Proposals/Qualifications, and conducting competitive procurements to obtain resources. The Town and selected QEP will work with the MEDEP and EPA to coordinate and oversee the successful completion of our Brownfield program, and we intend to seek the advice and support of the EPA Project Officers and MEDEP Brownfields Coordinators for direction on programmatic requirements. The Town may also utilize the services of the MCCOG; we are a member and have historically worked closely with them on several projects including community outreach and involvement, grant writing, and review of applications. The Town will also utilize services from our Community Organizations to support grant activities.

**Past Performance and Accomplishments**

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments

In 2019, the Town received a \$450,000 Business Block Redevelopment Grant to convert a dirt parking area in our downtown. The Town leveraged a \$250,000 grant from the Northern Borders Regional Commission (NBRC), and all activity and financial reports were successfully completed, and a final report, with video, was submitted within the project schedule. Four years after completion, the buildings served by this lot were fully occupied with twelve stores/restaurants. Another example of a successful grant was a \$396,000 grant from Rural Development to oversee infrastructure improvements completed by the MaineDOT along Main Street. This Town worked with DOT to avoid conflicts between contractors, keep the project on schedule, and provide updates to funding agencies. These grants were successfully executed and closed out on time and within the projected budget. John Fancy oversaw all aspects of these grants to ensure that work was performed successfully, efficiently, and in accordance with the terms of the grant.

(2) Compliance with Grant Requirements

The Town has successfully managed the grants described above, as well as nearly 20 other state and federal grants in the last 20 years, ranging from a \$3.6M MEDEP grant for sewer replacement in 1993, to a \$25,000 FEMA EMPG grant for a generator replacement in 2021. All grants have been successfully executed, drawn down, and closed out in accordance with applicable and varying grant requirements, within the specified budget, and on schedule. The Town has submitted reports/deliverables and financial statements as needed to successfully execute these funds. No submittal or tracking issues have been identified, and no corrective actions have been taken against the Town.

# **NARRATIVE ATTACHMENT**

## **Threshold Criteria for Assessment Grants**

**Town of Thomaston, Maine**

**U.S. EPA FY2024 Brownfields Assessment Grant Application**

## **Threshold Criteria for Assessment Grants**

### **1. Applicant Eligibility**

- a. The Town of Thomaston, Maine is a municipality (General Purpose Unit of Local Government) eligible to apply for Brownfields Assessment funding from the U.S. Environmental Protection Agency (EPA) Brownfields Grant Program.
- b. Not Applicable

### **2. Community Involvement**

The Town will create informational flyers, handouts/brochures, and project summary documentation to be publicized in local newspapers, on the Town website, and through press releases. The Town will develop an informational repository on our website which will include outreach materials and provide updates on the Brownfield project. This page will include both the Town Manager's and the Project Manager's contact information, with a notice that these officials may be contacted directly with questions, concerns, and comments. It is Town practice to respond to all emails and to continue future communications; response may also be in the form of face-to-face meetings, targeted marketing materials, or a "Frequently-Asked-Questions" page on our website. The Town publishes a newsletter each month that is posted on the Town's website, Facebook, made available at the Town office, and emailed to many citizens. The use of door-to-door visits, community meetings, and flyers will be used to involve our elderly and low-income individuals who may not have internet access.

During the 4-year term of the brownfield project, a minimum of four public meetings will be held to allow Town officials to present details of the project and to answer questions, receive comments and concerns directly from the public. Public meetings are commonly held for all major projects and are often very well attended, and every Select Board meeting has a public comment period when citizens may bring up subjects of concern or interest to them. The Town will translate documents, provide translators, provide document reading services, and providing access to assistive technologies such as teletypewriter relay (TTY) services as needed. We will use the Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants fact sheet as a resource for alternatives to face-to-face meetings (e.g., zoom meetings, QR codes, flyers, local TV, and radio, as needed).

### **3. Expenditure of Existing Grant Funds**

The Town of Thomaston affirms that it does not have an open U.S. EPA Brownfields Assessment or Multipurpose Grant.

### **4. Named Contractors and Subrecipients**

The Town has not procured contractors or subrecipients prior to this application. The Town will select contractors in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500, and the EPA's *Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements*. We do not anticipate subrecipients as part of this grant.