

Department of Environmental Protection

100 Cambridge Street Suite 900 Boston, MA 02114 • 617-292-5500

Application for Brownfields Community-wide Assessment Grant for States and Tribes Massachusetts Department of Environmental Protection (MassDEP)

Narrative Information Sheet

1. Applicant Identification

Massachusetts Department of Environmental Protection (MassDEP) 100 Cambridge Street, Suite 900 Boston MA, 02114

2. Funding Requested

a. Assessment Grant Type

Community-wide Assessment Grant for States and Tribes

b. Federal Funds Requested

- i. Requested Amount \$2,000,000
- ii. Federal Funds Requested Waiver Not applicable

3. Location

[State] Commonwealth of Massachusetts (state-wide)

4. Target Area and Priority Site/Property Information

Please note that the entirety of the Commonwealth of Massachusetts (with the exception of Nantucket and Martha's Vinyard) is within a Metropolitan Statistical Area. Three of the Target Areas listed below are within higher population density areas and the Town of Brimfield is located in a low density, low-population area.

Target Areas:

City of Holyoke, MA Town of Brimfield, MA City of Leominster, MA City of Chelsea, MA

Priority Sites:

195 Appleton Street, Holyoke, MA (*RTN 1-00656 & 1-11119)

400 Palmer Road, Brimfield, MA (RTN 1-00564 & 1-17451)

139 Seventh Street, Leominster, MA (RTN 2-19097)

152 Main Street, Leominster, MA (RTN 2-11935)

110-200 Marginal Street, Chelsea, MA (RTN 3-35988 & 3-35968 & 3-35533)

5. Contacts

a. Project Director

David Foss, Statewide Brownfields Coordinator MassDEP, Bureau of Waste Site Cleanup 100 Cambridge Street, Suite 900, Boston MA, 02114

Phone: 774-991-5996

E-Mail: David.Foss@Mass.Gov

^{*} RTN – MassDEP Release Tracking Number (included to indicate previously documented presence of contamination)

b. Chief Executive/Highest Ranking Elected Official

Bonnie Heiple, Commissioner

MassDEP

100 Cambridge Street, Suite 900, Boston MA, 02114

Phone: 617-292-5956

E-Mail: Bonnie.Heiple@Mass.Gov

6. Population

<u>Commonwealth of Massachusetts</u> – 7,029,917

Holyoke, MA: 37,720 Brimfield, MA 3,694 Leominster, MA: 43,782 Chelsea, MA: 38,637

7. Other Factors

Other Factors				
Page No Town	wn Description			
p. 1 Brimfield	Community population is 10,000 or less.			
NA	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			
p. 2 Holyoke p. 2 Brimfield	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			
p. 2 brillineia	or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).			
p. 2 Brimfield p. 3 Chelsea	The priority site(s) is in a federally designated flood plain.			
p. 4 Holyoke p. 5 Brimfield	The reuse of the priority site(s) will facilitate renewable energy from wind, solar, hydroelectric, or geothermal energy.			
NA	The reuse of the priority site(s) will incorporate energy efficiency measures.			
NA	30% or more of the overall project budget will be spent on eligible reuse/areawide 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.			

8. Letter from the State or Tribal Environmental Authority

Not applicable – applicant is a state.

9. Releasing Copies of Applications

Not applicable.

Narrative/Ranking Criteria (and Evaluation Criteria) for Assessment Grants

1. Project Area Description and Plans for Revitalization

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Areas

The geographic boundary of this grant is the Commonwealth of Massachusetts. The entire state (excepting the islands of Nantucket and Martha's Vineyard) is all within a Metropolitan Statistical Area. Massachusetts has many urban areas that are densely populated and a rich history of industrialization that has left a disproportionate number of contaminated sites including brownfields, many of which are concentrated in disadvantaged communities with Environmental Justice (EJ) populations. The national EPA Cleanup in My Community map illustrates the high density of contaminated properties across the Commonwealth. The 2018 MassDEP brownfields inventory documents over 1,300 known brownfield sites, and many more exist. The environmental, health and economic effects associated with brownfields disproportionately burden the most sensitive communities that continue to struggle to address them while facing staff and budget shortages at the municipal level. This grant will allow MassDEP to assist communities that are most in need.

This grant focuses on target areas that represent distinct categories of geography and demographics representing the Commonwealth of Massachusetts, including: the Holyoke, Leominster and Chelsea Target Areas are within higher population density areas and the Town of Brimfield is located in a low density, low-population area.

Two of the Target Areas (Holyoke and Brimfield) are located in Hampden County, which is the most populous of the four western counties of Massachusetts. It borders the state of Connecticut on the south and is bisected by the Connecticut River. The City of Holyoke (pop. 37,720), located on the Connecticut River in west central Massachusetts, is one of the most economically distressed areas of the state. Holyoke's economic development was rapid starting in 1850. Canals were dug through the lower wards, supporting a wide variety of manufacturing industries. By 1900, it was recognized as the "Paper City of the World". Paper manufacturing grew as the dominant force in the city, and at one time over 25 paper mills were in operation. From a peak in the 1920s, local industry gradually declined as companies moved overseas or migrated to the South and West, leaving contamination and blight. Economic stressors in Holyoke include high rates of poverty (median household income [MHHI] is 17% of the state median), unemployment (60% higher than the state), and high rates of English Language Isolation (64% of households where adults lack English language proficiency). According to EPA EnviroAtlas, the City of Holyoke has 24 sites listed in acres and 97 inactive RCRA sites. MassDEP has identified 34 Brownfields sites (with documented contamination). The economic decline in the area has resulted in a broad range of sites requiring Brownfields assessment and redevelopment.

The rural Town of **Brimfield** (pop. 3,694) is located within the Quabog River valley. The Town relies completely on private drinking water supply wells, and there are approximately 100 residential homes and small business properties with private wells located within a ½-mile radius of the priority site, Trant Equipment and Scrap Iron site (**Trant Iron**). Brimfield does not have a significant EJ population, however, the small number of contaminated sites can have an out-sized impact on natural resources and drinking water aquifers. The Town does not have the technical or financial resources to conduct response actions to address impacts from Brownfields.

The City of **Leominster** (pop.43,782), target area is in the north central part of the state in the Nashua River valley, where historic industry has left a legacy of abandoned properties and contaminated sites along rivers subject to increased flooding. Based on this legacy, for the first much of the 20th century, before industry shifted overseas, Leominster was an industrial powerhouse known as the "Pioneer Plastics City." Stark evidence of climate change risks includes catastrophic flooding from historically high rainfall that damaged roadways and infrastructure in Leominster in September 2023. Economic stressors include high rates of poverty (MHHI is 22% of the state median), and energy costs [92nd percentile (Pi)] for average energy costs relative to household income. Other indicators of economic decline include numerous vacant storefronts and underutilized mill buildings. According to the EnviroAtlas data, the City of Leominster has 5 sites listed in ACRES and 88 inactive RCRA sites, and MassDEP has identified 15 Brownfields sites. The economic decline in the area has resulted in a significant number of sites contaminated with petroleum and hazardous materials that would benefit from Brownfields assessment and redevelopment.

The City of **Chelsea** (pop. 38,637) is a dense city located along Chelsea Creek immediately to the north of Boston, and one of the most severely economically distressed areas of the state. Chelsea is in the Boston metropolitan area, where there is insufficient affordable housing, clean energy, and publicly accessible greenspace to support the environmental justice (EJ) population. Economic stressors in Chelsea include high rates of poverty (MHHI is 42% of the state median), high rates of English Language Isolation (53% of households where adults lack English language proficiency), and low levels of educational attainment (adults with a college degree at 46% of the state average). According to the EnviroAtlas data, the City of Chelsea has 1 site listed in ACRES and 59 inactive RCRA sites, and MassDEP has identified 8 Brownfields sites. The economic decline in the area has resulted in a broad range of sites requiring Brownfields assessment and redevelopment. The presence of contaminated waste sites in areas subject to flooding and sea level rise is a significant concern.

1.a.ii. Description of the Priority Brownfield Site(s)

All four Target Areas face brownfield challenges that are disproportionate to the resources of the communities to address them. The sites described below are the priority sites chosen for this grant application; however, there are several other potential properties within each target area and other parts of the state. Given space limitations, our proposal will focus on the following sites:

The 5.3-acre **American Thread Mill** site at 195 Appleton Street is a priority of the City of **Holyoke** because of health hazards associated with documented contamination and hazardous building materials (the building is in disrepair and open to the elements). The property is on a canal linked to the Connecticut River and has deeded water rights to the Holyoke industrial canals and a currently unused generator capable of generating 1 megawatt of hydroelectric power. The site has a deed restriction due to petroleum and chlorinated volatile organic compound (CVOC) contamination.

The 17-acre **Trant Iron** site at 400 Palmer Road is a priority of the Town of **Brimfield** because significant soil and groundwater contamination has been documented at the property, the responsible party is deceased, and the Estate is financially unable to perform response actions. The property, much of which is within a mapped 100-year flood plain, is bordered by Foskett Mill Brook, a tributary of the Quabog River, and was operated as an automotive and tire salvage and junkyard from the 1930s until approximately 2007. Scrap metal, including discarded automobiles, automobile parts, and used tires are located at the Site. Several drums, tanks and other containers of oil also remain on site. Soil and groundwater assessment was conducted by the Pioneer Valley Planning Commission and the Town of

Brimfield between 2007 and 2009. Contaminants identified in groundwater and soil include petroleum, VOCs, metals, and polychlorinated biphenyls (PCBs). The site is a priority based on the prevalence of PFAS associated with landfills and properties similar to **Trant Iron**, the previous detection of other groundwater contaminants, and the location of this site in close proximity to a residential neighborhood with private drinking water wells.

The 0.35-acre property at **139 Seventh Street** in **Leominster** was the location of a light industrial facility that operated for several decades, beginning before 1936. In January 2014 (while the building was abandoned) there was a report of strong fuel odors from the site building. A release of No. 2 fuel oil was identified in the basement that resulted in oil draining into the basement floor space and a nearby sump. Booms were deployed by MassDEP personnel into the sump and approximately 8-inches of oil was recovered; however, it is unknown how much oil drained into the soil at the bottom of the sump. The City of Leominster foreclosed on the property for back taxes and the on-site building was demolished because it was a risk to public safety, making the site a key priority of the City for assessment, cleanup and redevelopment.

The 0.40-acre property located at **152 Main Street** in **Leominster** was the location of a former gas station which operated from the 1930's through 1998. The Property is currently occupied by a single-story, slab on grade automobile garage, though no repair work is occurring. The property is under-utilized as a parking lot. Evidence of a release of petroleum to the environment was observed during the removal of Underground Storage Tanks (USTs) in 1997. USTs previously operated at the site included one 1,000-gallon waste oil UST and four 4,000-gallon gasoline USTs. Documented contamination at the site includes gasoline and petroleum constituents. The site is located in a mixed residential and commercial district and is a priority of the City of Leominster for assessment and commercial redevelopment.

The 3.6-acre former **Boston Hides & Furs** industrial site is located at 110-200 Marginal Street, a portion of which is in a mapped 100-year flood plain and is a priority redevelopment site for the City of **Chelsea**. Historic operations at the property include the Austin and Graves Cracker Factory and the White-Holman Furniture Company from at least 1889 until sometime after 1911 when the Beacon Wiper Company, a firm that recycled rags into various wiping products, began operations at the Site. The historical operations of the property by Beacon Wiper Co. raise the concern of possible use of chlorinated solvents as part of their rag cleaning processes. Since 1985, the property has been occupied and operated by the Boston Hides and Fur Company. Reports documented the presence of a 5,000-gallon petroleum UST that appears to have been removed in 1975. Previous assessment documented contamination at the site includes metals (lead), asbestos, and petroleum. The current owner is planning to vacate the property and additional assessment is needed prior to the City acquiring the property for redevelopment.

1.a.iii. Identifying Additional Sites

MassDEP will perform additional outreach in the target communities to provide information to community members on brownfields topics and solicit their input regarding how best to utilize grant funds for the benefit of their communities. We will also reach out all 14 regional planning agencies across the state (and their member communities) to solicit interest from other towns and cities that were not initially identified as target areas. We will focus on communities that may not have the capacity to administer their own grant, low-population rural communities, and disadvantaged communities consistent with US EPA and Commonwealth of Massachusetts EJ guidance and criteria. It is a primary objective of this program to identify new communities that have not previously benefitted from

Brownfields grant resources. We will prioritize priority sites that communities identify as having the greatest potential that to achieve the community's vision for equitable and sustainable growth.

1.b. Revitalization of the Target Areas

1.b.i. Reuse Strategy and Alignment with Revitalization Plans

In 2020, the City of **Holyoke** updated its Urban Renewal Plan, the primary goals of which include: promote private investment and create new jobs; improve housing options; rehabilitate or remove blighted properties; upgrade public infrastructure; create a sustainable community; improve quality of life; and increase the tax base in the Center City area. The assessment, cleanup, and planned reuse of the **American Thread Mill** property as a mixed-use ground floor commercial with affordable and work force housing on upper levels, supports and addresses many of these goals. The potential for increased hydroelectric capacity in the region will help the City of Holyoke promote sustainability within and beyond the city limits. Reference: https://www.holyoke.org/the-urban-renewal-plan/

The Town of **Brimfield** is located within the Quinebaug and Shetucket Rivers Valley National Heritage Corridor. Heritage landscapes are special places created by human interaction with the natural environment that help define the character of a community, reflect its history, and have scenic qualities. This wealth of landscapes is central to each community's character, yet heritage landscapes are vulnerable. The presence of the **Trant Iron** site and the documented contamination located proximal to the Foskett Mill Brook threatens the community character. Assessment, cleanup, and redevelopment of a portion of the site as open space (conservation land) and a portion of the site as a solar photovoltaic array. These reuse options will mitigate impacts to natural resource areas and drinking water supplies in the area and meet the objectives of the Town. Reference: https://www.mass.gov/doc/brimfield/download

Consistent with their 1998 Growth Management Plan, the City of **Leominster** developed an Open Space & Recreation Master Plan in 2021, that prioritized the range of recreational space, trail networks, and green space in the city. The assessment, remediation, and redevelopment of Brownfields sites, including **139 7th Street** and **152 Main Street**, will support the City's goals, and will mitigate contamination in these mixed residential and industrial areas. Reference: https://www.leominster-ma.gov/DocumentCenter/View/1049/2021-to-2028-Open-Space-and-Recreation-Plan-PDF

In 2022, the City of Chelsea updated its Chelsea Creek Municipal Harbor Plan to promote public access, economic development, infrastructure, and mitigation measures to address climate change. As documented therein, **Chelsea**'s industrial history has resulted in over 530 known MassDEP-regulated release sites. Nearly half of the sites along Chelsea Creek have environmental property restrictions in the form of institutional controls, that signify the presence of concentrations of oil and hazardous substances contamination remaining at properties after a cleanup under the state's environmental cleanup program (Response Program). The assessment, cleanup, and reuse of the **Boston Hides & Furs** as a mixed-use open space and high-density affordable housing project is in full alignment with Chelsea's redevelopment and revitalization strategy. Reference:

https://www.chelseama.gov/departments/housing and community development/workforce economic development.php

1.b.ii. Outcomes and Benefits of Reuse Strategy

The redevelopment of the **American Thread Mill** property will create an anchor property in the middle of **Holyoke**'s canal district, will promote sustainable energy, and will be a catalyst for private development in the neighborhood. The City's planned reuse includes redevelopment of the large commercial property as mixed use commercial (ground floor) with affordable and workforce housing on the upper levels.

The natural and historic resources within and near the Town of **Brimfield** (including trails, rivers, and more) have driven increased visitation to the region, including biking, hunting, fishing, boating, and birding. The presence of a grossly contaminated site is a constraint on the Town's ability to capitalize on these visitors. Remediation and redevelopment as open space and solar development will eliminate blight, protect drinking water and wetland resource areas.

Redevelopment of the **Boston Hide and Furs** property as mixed-use commercial, affordable housing, and workforce housing will have significant economic benefits for the City of **Chelsea** through increased jobs, promoting public access to waterfront resource areas, and increase property tax revenue.

The target projects in the **City of Leominster** have a strong potential to become community assets, following decades as liabilities, providing limited property tax revenue, while draining police, fire and public works budgets to keep the properties safe and secure.

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Reuse

In addition to the national grant competition held annually by EPA, MassDevelopment (state economic development and finance agency) holds a Brownfields Remediation Fund Grant competition every other year. Sites that are in economically distressed areas and are positioned for assessment and/or cleanup may be eligible to apply for this financing. Some sites are eligible for Brownfields Tax Credits, issued by the Massachusetts Department of Revenue. The tax credits are available where an eligible person (as defined by M.G.L. Ch. 21E) performs response actions sufficient to achieve a permanent solution. Brownfields Tax Credits are only available following completion of all required assessment and remedial response actions. To position sites for an EPA cleanup grant or private investment, MassDEP proposes to conduct assessments with the Brownfields Community-Wide Assessment Grant to facilitate the cleanup and redevelopment plans in the target areas and across the state. Maximizing the number of sites assessed with the CWAG-ST grant will allow MassDEP to prioritize site-specific cleanup activities with the 128(a) BIL funding.

1.c.ii. Use of Existing Infrastructure

By strategically investing brownfields funds, along with other sources of capital, including those identified above, MassDEP will facilitate the reuse of sites in areas served by existing infrastructure including sewer, water, broadband, 3-phase power, and roads, will promote renewable energy development, green space and recreational activity, and build resiliency in areas near existing rail trails and rivers. All of the priority sites identified, except the Brimfield site, have access to municipal sewer and water. As a result of previous industrial uses and higher population in Holyoke, Leominster, and Chelsea, existing infrastructure capacity is more than adequate to support the redevelopment plans. While the **Trant Iron** site does not have sewer and water, there are adequate community services and existing infrastructure to support development of a solar photo voltaic facility and open space.

2. Community Need and Community Engagement

2.a. Community Need

2.a.i. The Community's Need for Funding

Throughout the state, small cities and rural towns often lack the experienced staff and capacity of their larger urban counterparts to initiate projects and navigate complicated federal grant programs. Many rural communities have a small number of dedicated staff fulfilling multiple roles and duties and insufficient time and funding to tackle Brownfields projects. By providing a statewide source of

Brownfields services over five years, MassDEP staff can support these communities and work directly with local staff and other stakeholders to provide expertise and meaningful support of assessment, cleanup planning, and reuse planning activities.

The Town of **Brimfield** (pop.3,694) qualifies as small population, has limited town staff and limited town hall hours. Planning and strategic decisions are the responsibility of volunteer or elected board members. Economic development and many other projects are addressed on an as-needed basis.

As summarized in the following table, the cities of Chelsea, Holyoke and Leominster all have significant populations that meet the Massachusetts EJ criteria and exhibit evidence of economic need including some of the lowest Median Household Income (MHHI) statistics in the state.

		City	Census Block	% of State	% in	Minority	
City	Address	МННІ	МННІ	МННІ	Poverty	(%)	% LEP
Chelsea	Marginal St	64,782	35,069	39	22.5	90	53
Holyoke	Appleton St	45,045	14,385	16	26.5	87	64
Leominster	Seventh St	69,525	18,563	21	7.9	51	20
Mass State	-	89,026 (state)	89,026 (state)	100	10.4	20.6	10
Source: MassGIS EJ Viewer MHHI: Median Household Income LEP: Limited English Proficiency							

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

According to data from MassGIS, EPA EJ Screen, and Climate and Economic Justice Screening Tool (Council on Environmental Quality), the Target Areas include the following sensitive populations: Holyoke linguistic isolation (99th Pi), poverty (97th Pi), unemployment (92nd Pi) and low attainment of a high school education (33rd Pi); Leominster unemployment (90nd Pi) and low attainment of a high school education (20th Pi); Chelsea linguistic isolation (97th Pi), low attainment of high school education (38th Pi), diesel particulate matter exposure (91st Pi), historic under investment, housing cost (90th Pi), lack of green space (95th Pi), low income (69th Pi), proximity to hazardous waste facilities (98th Pi), proximity to risk management facilities (90th Pi), and low attainment of a high school education (33rd Pi); and Brimfield relies on use of private residential and commercial drinking water supply wells located within 1,000-feet of a contaminated waste site. Adverse health and welfare conditions are potentially exacerbated by exposure to pollutants found at the priority sites including petroleum, lead, asbestos and VOCs. This grant will facilitate the assessment and cleanup of these contaminants, directly reducing the health burdens to the sensitive populations.

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

The contaminants at the target brownfields sites include petroleum, PAHs, metals (including lead), and PCBs in soils; and CVOCs and VOCs in soil and groundwater. These contaminants may be linked to high rates of respiratory disease, preterm births, and other health issues, and some are known or suspected carcinogens. According to data from the Center for Disease Control and Prevention and EPA's EJ Screen the **Holyoke** priority site is in a census tract with elevated rates of asthma (93rd Pi), diabetes (93rd Pi), heart disease (95th Pi) in a low-income area (94th Pi). According to data from the CDC and EPA's EJ Screen the **Leominster** priority site is in a census tract with elevated rates of asthma (93rd Pi) in a low-income area (78th Pi). According to data on the Massachusetts Environmental Public Health Tracking website, the rates of childhood Hodgkin- and non-Hodgkin lymphoma in both **Chelsea** and **Holyoke** are more than

150% of the standardized incidence ratio for the Commonwealth of Massachusetts. Elevated rates of disease and negative health outcomes often correlate with proximity to Brownfields and contaminated waste sites. The described target areas have demonstrated sensitive populations with low income and higher than average rates of poverty which can also contribute to many health risks including cancer. This grant will support the identification, mitigation, and eventual cleanup of contaminants at the priority sites, reducing exposure and associate risks to the sensitive populations.

(3)(a) Identification of Environmental Justice (EJ) Issues

Sensitive Populations in four of the Target Areas (excluding Brimfield) face significant environmental burdens in addition to brownfields, including air pollution, proximity to hazardous waste sites, lead paint exposure and others. As indicated by the EJ indices in EJSCREEN. In **Chelsea**, 10 out 13 EJ indices exceed the 90th national percentile and all 13 exceed the 60th. In **Holyoke**, 5 indices exceed the 90th percentile nationally and 5 additional ones the 70th. In **Leominster**, 4 indices exceed the 70th percentile nationally and 5 exceed the 60th state level percentile. The table presented above in Section '2.a.i. The Community's Need for Funding' presents the demographic criteria established by the Commonwealth of Massachusetts to meet the state definition of an EJ population. Each of the Cities and priority site census tracts meet the State and Federal criteria for EJ areas.

(3)(b) Advancing Environmental Justice

In addition to identifying and assessing sources of contamination which may be linked to potential health risks, improving the economic quality of the residents in the target communities of Holyoke, Leominster, and Chelsea will have a direct impact on improving their quality of life by providing opportunities to increase the median income and lessen the tax burden on residents, providing more income for them to reduce food insecurity, and access to health care. The development in Chelsea will improve access to the City's waterfront. In addition, residents in Holyoke and Chelsea, and other low lying riverine areas are disproportionately impacted by EJ issues associated with the priority brownfields sites including a water quality and flooding issues related to increased precipitation events. EPA funding will contribute to addressing these conditions through equitable development approaches, building community resiliency, and thoughtful engagement of vulnerable populations as identified in this proposal. The redevelopment of the priority site in Holyoke will facilitate hydroelectric power generation, decreasing the greenhouse gas emissions for development in the area. The successful redevelopment of the **Brimfield** priority site will position the property for potential development of a solar photovoltaic project in that community. To the extent feasible, MassDEP will work with the Target Communities to minimize the potential for displacement of overburdened populations, including the use of tools like Community Partnership Agreements. The Cities of Chelsea and Holyoke have prioritized the development of affordable housing in their reuse plans, this is consistent with the objectives of the executive branch of Massachusetts' state government. Where feasible, Brownfields funding will be utilized to leverage funding promoting the development of affordable housing.

2.b. Community Engagement

2.b.i. and ii. Project Involvement and Roles

MassDEP conducted four Brownfields Roundtable outreach meetings between March and September 2023, with over 200 attendees, from which we built a list of contacts and potential priority sites. In preparing this application, MassDEP has communicated with planners and municipal leaders across the state, with a focus on communities that could benefit from brownfields assistance but may not have the capacity to apply for and manage their own grant. We identified the target areas and priority sites

included in our grant application and we have points-of-contact in each target area that will facilitate communication with community stakeholders, identify community needs/priorities, and assist with site access. Upon being awarded a grant, MassDEP will reach out to solicit interest from other communities that were not initially included as identified target areas. We intend to focus on communities that may not have the capacity to administer their own grant, rural towns including disadvantaged communities, consistent with US EPA EJ guidance and the Commonwealth of Massachusetts EJ criteria.

a. Community Engagement

i. Project Involvement and ii. Project Roles

Name of organization/ Office	Point of Contact (name, email, & phone)	Specific involvement in project/assistance provided		
Town of Brimfield	Anthony Soto, Select Board			
Select Board	SelectBoard5@BrimfieldMA.org			
	(413) 330-9722			
City of Holyoke	Alicia Zoeller, Director	Site selection; community		
Community Development	Zoellera@holyoke.org	outreach; host for public		
	(413) 322-5610	meetings; future reuse input;		
City of Leominster	Elizabeth Wood, AICP, Director	potential developer or		
Planning & Development	Ewood@leominster-ma.gov	responsible for finding a		
	(978) 962-3542	potential developer.		
City of Chelsea	Alexander Train, AICP, Director			
Dept. of Housing &	atrain@chelseama.gov			
Community Development	(617) 466-4192			
Montachusett Reginal	Karen Chapman, Director	Will provide input and support		
Planning Commission	kchapman@mrpc.org	on community outreach; host		
(Planning & Development)	(978) 798-6168	for public meetings; and will		
Pioneer Valley Planning	John O'Leary, Principal Planner	assist in promoting		
Commission	JOleary@pvpc.org	environmental justice.		
(Hampden County)	(413) 781-6045			

In addition to the entities listed above, MassDEP will conduct a campaign to engage additional municipalities, local organizations, and groups via emails and phone calls, public meetings or webinars involving community organizations, and through our Brownfields Webpage to be involved in projects as additional target areas and priority sites are identified.

2.b.iii. Incorporating Community Input

MassDEP's initial engagement with communities is typically through community leaders as they can best gauge needs and what actions would be of greatest benefit to their communities. After that, it is important to also engage community members and stakeholders. The purpose of outreach meetings is not only for educating the public but also to solicit input in identifying properties that could benefit from brownfields assistance, and to learn how distressed properties impact the community and what is appropriate reuse of these properties. Community engagement in reuse planning is a key element for the planners and the community to envision the future of their community. During this engagement, MassDEP will consider all community questions, comments, concerns, and recommendations when identifying and planning for additional sites to be assessed. Comments or questions that warrant a response will be addressed by the Statewide Brownfields Coordinator and site-specific community liaison. MassDEP will host regional Brownfields roundtables in each of the four regions of the state. To the extent feasible, we will hold these meetings in-person within the Target communities and invite

neighborhood stakeholders proximal to the priority sites. We will adjust meeting formats to take into consideration the municipality's protocols and COVID-19 related precautions as appropriate. This includes providing a remote option (e.g., Zoom) and following any Center for Disease Control (CDC) guidelines for group meetings. Additional methods of communication will include MassDEP and local websites, one-on-one conversations, local news sites, MassDEP social media, and e-mail.

3. Task Descriptions, Cost Estimates, and Measuring Progress

3.a. Description of Tasks/Activities and Outputs

Task 1: Cooperative Agreement Oversight

<u>i. Project Implementation</u>: Administrative oversight of grant including, but not limited to, quarterly performance reports, ACRES updates, and coordination of internal meetings with regional staff and community-based organizations. Attendance at the National Brownfields Conference(s). Procurement of QEP for the duration of the grant has already been completed with alternative funding sources (details in Section IV.E.4.a.iv, below) The state's procurement process places a priority on strong labor practices and promotes local hiring for statewide contracts.

ii. Anticipated Schedule: Throughout grant period iii. Task Activity Lead: MassDEP

iv. Outputs: 20 quarterly performance reports, 1 final report, ACRES data, and conference attendance.

Task 2: Community Outreach

<u>i. Project Implementation</u>: Outreach meetings to educate the public, discuss the status of identified priority sites, identify potential new priority sites, and solicit community input. Via other communication methods (e.g., website, social media, e-mail, in-person or remote meetings with community leaders and stakeholders, etc.), solicit interest from communities that may not have benefitted from brownfields funding in the past. The primary criteria for identifying additional sites include: 1) sites in communities that do not have the capacity to administer their own grant; 2) rural communities; and 3) sites in disadvantaged communities including those with EJ populations.

<u>ii. Anticipated Schedule</u>: Throughout the grant period, including quarterly Brownfields roundtables, site-specific meetings prior to Phase II ESAs, prior to preparing ABCAs or reuse plans, and following the completion of assessment to present investigation findings to inform stakeholders about next steps.

iii. Task Activity Lead: MassDEP and community partners

<u>iv. Outputs</u>: Community meetings – At least one in each community where priority sites are located, and at least two Brownfields Roundtable meetings in each of the four MassDEP regions, (i.e., minimum of 13 meetings). Update MassDEP website (on-going) and social media (twice per month) to promote Brownfields community engagement. The majority of priority sites will be in communities with EJ populations. The MassDEP EJ outreach coordinator will work with the Brownfields team to facilitate engagement documents (e.g. Site-specific hand-outs or FAQs) in languages specific to the target community. Charettes are anticipated for each site that progresses to the reuse planning stage.

Task 3: Phase I and Phase II Environmental Site Assessments (ESA)

<u>i. Project Implementation</u>: Securing site access. Preparation of Phase I and Phase II ESAs including: work scope approvals, site-specific quality assurance project plans (SSQAPPs), field work, report preparation, report reviews and approvals. Depending on site requirements, field work may include (but not limited to): geophysical surveys, soil sampling, sediment sampling, ecological risk assessments, test borings, bedrock drilling, test pits, monitoring well installation, groundwater monitoring, pumping tests,

hazardous building material surveys, indoor air monitoring, private well monitoring, background determinations, and statistical analyses/evaluation. All necessary field methods will be used to conduct the site-specific assessment. MassDEP project oversight and any legal assistance required for securing site access will be performed utilizing alternative funding sources.

<u>ii. Anticipated Schedule</u>: Throughout the grant period <u>iii. Task Activity Lead</u>: MassDEP and QEP(s) <u>iv. Outputs</u>: 12 Phase I ESAs with AAI checklists, 10 Phase II ESAs, 4 Supplemental Phase II ESAs, including SS-QAPPs for all Phase II sampling activities. If the regulatory status of a project site warrants it, then project deliverables will include state-specific regulatory submittals (e.g. MCP Tier Classifications and/or Permanent Solution Statements).

Task 4: Cleanup and Reuse Planning

<u>i. Project Implementation</u>: For sites with adequate assessment data, MassDEP will work with communities to position them for future cleanup funding by assisting in the preparation of cleanup and/or reuse plans, including ABCAs, Remedial Action Plans, and redevelopment plans. MassDEP project oversight will be performed utilizing alternative funding sources.

<u>ii. Anticipated Schedule</u>: Throughout the grant period <u>iii. Task Activity Lead</u>: MassDEP and QEP(s) <u>iv. Outputs</u>: 5 Remedial Action Plans (RAP)/Assessment of Brownfields Cleanup Alternatives (ABCA). Note: MassDEP typically requests that RAPs and ABCAs be prepared as a single document. 5 Reuse (i.e., visioning) Plans or planning charrettes.

3.b. Cost Estimates

Task 1: Cooperative Agreement Oversight: This task includes primarily administrative costs. Personnel costs are calculated based on 7% of MassDEP's Statewide Brownfields Coordinator's time (136.5 hours/year x \$65/hour x 5 years). Travel costs based on 3 individuals attending 1 National Brownfields Conference held during the grant period (3 x \$1,800 per person for airfare, hotel, meals, and registration fees). Supply costs (supplies, materials, and/or allowed refreshments for meetings) are estimated. Fringe and indirect costs are a calculated percentage of personnel cost per the EPA-approved cooperative agreement.

Task 2: Community Outreach: These costs are for reaching out to the communities identified in this application to provide education regarding all things brownfields and to solicit their input regarding how best to spend grant funds for the most benefit within their communities. Funds will also be used to reach out state-wide to solicit interest from other communities that were not identified as target areas. QEP(s) contractor assistance at an estimated \$30,000 per year. Personnel costs are based on assuming 18% of MassDEP's Project Manager time (351 hours/year x \$27.50/hour x 5 years). Fringe and indirect costs are a calculated percentage of personnel cost per the EPA-approved cooperative agreement. Travel costs are for instate travel for various outreach efforts (approx. 985 miles/year x \$0.62/mile x 5 years).

<u>Task 3: Phase I and Phase II Environmental Site Assessments</u>: All costs under this task are Contractual for our QEP(s) to complete 12 Phase I Environmental Site Assessments (ESAs) at \$10,000 each; 10 Phase II ESAs at \$65,000 each; and 4 Supplemental Phase II ESAs at \$122,000 each. MassDEP oversight and legal assistance required for site access will be funded from alternative sources.

<u>Task 4: Cleanup and Reuse Planning</u>: All costs under this task are Contractual for QEP to complete 5 Remedial Action Plans (RAPs)/Assessment of Brownfields Cleanup Alternatives (ABCA) at \$50,000 each; and prepare 5 Reuse Plans or coordinate 5 planning charrettes at \$30,000 each. MassDEP project oversight will be funded from alternative sources.

	Costs Ov				
Budget Categories	1. Cooperative Agreement Oversight	2. Community Outreach	3. Phase I & Phase II ESAs	4. Cleanup & Reuse Planning	TOTAL
Personnel	\$ 44,365	\$ 48,263			\$ 92,628
Fringe Benefits	\$ 19,279	\$ 20,885			\$ 40,164
Travel	\$ 5,400	\$ 3,053			\$ 8,453
Equipment					-
Supplies	\$ 1,000	\$ 3,000			\$ 4,000
Contractual		\$ 150,000	\$1,258,000	\$ 400,000	\$1,808,000
Other (Specify)					-
Indirect Costs	\$ 22,442	\$ 24,313			\$ 46,755
Total Budget	\$ 92,486	\$ 249,514	\$1,258,000	\$ 400,000	\$2,000,000

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

MassDEP will track and report the progress in implementing our work plan through quarterly performance reports and keeping ACRES up to date with respect to the projects we have taken on. MassDEP's primary objective in implementing this grant is to position sites for cleanup (and cleanup funding) with the ultimate goal of getting sites redeveloped and put back into productive use while being protective of human health and the environment. The MassDEP Bureau of Waste Site Cleanup holds quarterly advisory committee meetings. The program outputs (number of community meetings, Phase I and II ESAs, SS-QAPPs, ABCAs, etc.) will be tracked annually and reported to the advisory committee in addition being included in the state's Project Activity Level report submitted to EPA.

4 Programmatic Capability and Past Performance

4.a. Programmatic Capability

4.a.i., ii, and iii Organizational Capacity, Structure, and Key Staff

The assessment and cleanup of sites contaminated with oil and/or hazardous materials (OHM) is overseen by MassDEP's Bureau of Waste Site Cleanup (BWSC). BWSC has the technical and staffing resources to successfully implement this grant. Financial administration tasks will be performed by the Technical and Financial Services (TFS) Division which will be responsible for financial tracking and reporting. MassDEP's attorneys in the Office of General Counsel (OGC) provide legal guidance and advice to address legal matters in the performance of Brownfields projects.

MassDEP's Brownfields Program resides within BWSC. David Foss serves as the Statewide Brownfields Coordinator (since 2022) and will serve as the Project Director for this grant. David has over 29 years of experience as a qualified environmental professional [hydrogeologist, Certified Professional Geologist (CPG), and Massachusetts Licensed Site Environmental Professional (LSP)]. The MassDEP Regional Brownfields Coordinators in each of MassDEP's four regions work with the Statewide Brownfields Coordinator and serve as liaisons between MassDEP and Massachusetts Brownfields grantees where they provide technical support, serve as non-voting members of their advisory committees, help vet proposed sites, and provide technical reviews of the various documents prepared pursuant to their grants. MassDEP maintains a highly qualified staff of environmental professionals (i.e., engineers and scientists) who will serve as project managers for the oversight of sites addressed pursuant to this grant including the following regional coordinators, each with between 20 to 35 years of experience as QEPs:

Caprice Shaw (Env. Scientist), Amy Sullivan (Env. Scientist), Kevin Daoust (Env. Engineer), Joanne Fagan (Env. Engineer), and Angela Gallagher (Env. Scientist).

4.a.iv. Acquiring Additional Resources

MassDEP will utilize the support of QEP to implement much of the technical work required under the grant. The QEP available to work under this grant will be selected from MassDEP BWSC's current Site Assessment Remediation Support Services (SARSS) contractors. These contractors were selected through a competitive procurement process that promotes strong labor practices. The most recent contract, SARSS VII was executed in Spring 2023 and will be in effect for the duration of the proposed FY2024 Brownfields grant period. The Commonwealth of Massachusetts is an Equal Opportunity Employer and does not discriminate on the basis of race, religion, color, sex, gender identity or expression, sexual orientation, age, disability, national origin, veteran status, or any other basis covered by appropriate law.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant

MassDEP has successfully administered EPA Brownfields State Response Program Grants (i.e., CERCLA 128(a) grants) since their inception through to the present.

(1) <u>Accomplishments</u>: Since 2005, Massachusetts has received over \$30M in 128(a) grants. These funds have been an invaluable resource for enhancing and maintaining Massachusetts' statutorily mandated release prevention and response program (Response Program). In recent years, 128(a) funds have been used for increasing MassDEP's capacity to oversee the assessment and cleanup of contaminated properties, maintaining a robust publicly accessible database of Massachusetts' contaminated sites and their status in the State Response Program, and updating regulations, standards, and policies. Since the initiation of the Bipartisan Infrastructure Law (BIL), supplemental BIL 128(a) funds have been allocated to MassDEP for site-specific cleanup and assessment. In the first year of funding (January to September 2023) response actions were initiated at six sites representing all four regions of Massachusetts. Five of the six sites are located in communities with EJ populations and the sixth is in a low-population town.

ACRES data for projects funded at the time individual grants were active is up to date. Data for non-site-specific work completed are reported as part of our 128(a) progress performance reports.

(2) <u>Compliance with Grant Requirements</u>: MassDEP has successfully administered EPA Brownfields Grants for the past 20+ years. During that time, MassDEP has fully complied with the conditions of our Cooperative Agreements and the scope of the Work Plans for each of our grants. MassDEP has completed and submitted all required performance reports to EPA. When delays in reporting have occurred, these were typically due to not having financial information available in a timely manner. In addition, for the past two 128(a) grants, the semi-annual performance reports due after the first six months of the grant period were not submitted as a result of the challenges associated with gathering the information needed for the reports while working remotely due to the COVID-19 pandemic. All final performance reports have been submitted as required.

For all 128(a) grant funding administered by MassDEP, we have expended the full grant fund amount.

ATTACHMENT

B. Threshold Criteria for Assessment Grants

1. Applicant Eligibility

The Massachusetts Department of Environmental Protection (MassDEP) is a state agency and is therefore an eligible applicant.

2. Community Involvement

In preparing this application, MassDEP has reached out to leaders in various Massachusetts communities that, based on our experience, could benefit from brownfields assistance, but may not have the capacity to apply for and manage their own grant. Based on this effort, the target areas and priority sites included in the grant application were identified. Upon award of the grant, MassDEP will perform additional outreach in the target communities to provide information to community members on brownfields topics and solicit their input regarding how best to utilize grant funds for the benefit of their communities. We will also reach out to solicit interest from other communities that were not initially identified as target areas. We intend to focus on communities that may not have the capacity to administer their own grant, rural communities, and disadvantaged communities consistent with US EPA and Commonwealth of Massachusetts EJ guidance and criteria.

MassDEP's initial engagement with communities is typically through community leaders, as they are generally the ones who can best gauge needs and what assistance would be of greatest benefit to the communities they represent. After that, it is important to also engage the members of the community themselves. MassDEP plans to hold outreach meetings for the purpose of educating the public and soliciting input in identifying properties that could benefit from brownfields assistance and for MassDEP to learn how distressed properties impact the community and how assessing these properties may help toward the betterment of the community in which they are located. All community questions, comments, concerns, and recommendations will be taken into consideration when planning for additional sites to be addressed pursuant to this grant.

MassDEP intends to hold meetings in-person within the various communities but will adjust as necessary to take into consideration COVID-19 related precautions as appropriate. This includes providing a remote option (e.g., Zoom) and following any Center for Disease Control (CDC) guidelines for group meetings. Additional methods of communication will include MassDEP and local websites, local newspapers, MassDEP newsletters, social media, and e-mail.

3. Named Contractors and Subrecipients

MassDEP's Bureau of Waste Site Cleanup, which includes our Brownfields Program, goes through a competitive procurement process as prescribed by the Massachusetts law, to solicit bids for the Site Assessment Remediation Support Services (SARSS) contract. The most recent contract, SARSS VII was executed in Spring 2023 and will be in effect for the duration of the proposed FY2024 Brownfields grant period. The procurement process publicly bid as CommBuys Bid#: BD-23-1045-BWSC0-BWSC1-78199, and Agency Document Number: BWSC-2023-SARSS VII-MSA that was posted on CommBuys on September 1, 2022. These contractors were selected through a competitive procurement process that promotes strong labor practices. The most recent contract, SARSS VII was executed in Spring 2023 and will be in effect for the duration of the proposed FY2024 Brownfields grant period. The Commonwealth

of Massachusetts is an Equal Opportunity Employer and does not discriminate on the basis of race, religion, color, sex, gender identity or expression, sexual orientation, age, disability, national origin, veteran status, or any other basis covered by appropriate law.

This contract engages QEP contractors for professional environmental services in support of the Massachusetts Release Prevention and Response Program regulations (MCP; 310 CMR 40.0000) and the Massachusetts Solid Waste regulations (310 CMR 16.00 and 310 CMR 19.00).

There will be no subrecipients for this grant.

4. Expenditure of Assessment Grant Funds

MassDEP does not have an open EPA Brownfields Assessment or Multipurpose Grant.

C. Additional Threshold Criteria for Site-Specific Applications Only

Not applicable

D. Additional Threshold Criteria for Community-wide Assessment Grants for States and Tribes

1. Target Areas and Priority Sites

The four (4) target areas and five (5) priority sites identified in Section IV.D.4 of the Narrative Information Sheet include:

Target Areas:

City of Holyoke Town of Brimfield City of Leominster, MA City of Chelsea, MA

Priority Sites:

195 Appleton Street, Holyoke, MA (*RTNs 1-00656 & 1-11119) Seventh Street, Leominster, MA (RTN 2-19097) 152 Main Street, Leominster, MA (RTN 2-11935) 400 Palmer Road, Brimfield, MA (RTN 1-00564 & 1-17451) 110-200 Marginal Street, Chelsea, MA (RTN 3-35988 & 3-35968 & 3-35553)

*RTN: MassDEP Release Tracking Number (included to indicate previously documented presence of contamination)

A minimum of ten (10) sites in total will be addressed during the grant period.