

NARRATIVE INFORMATION SHEET

ROI-24-C-010

1. Applicant Identification – The City of North Adams, Massachusetts

2. Funding Requested

- a. Single Site Cleanup
- b. \$1,900,000

3. Location

- a. City: North Adams
- b. County: Berkshire
- c. State: Massachusetts

4. Property Information

Former Tannery Dump
Ashton Ave., Book 1840 Page 1096
North Adams, MA 01247

5. Contacts

a. Project Director
Mike Nuvalle
413-662-3025
mnuvalle@northadams-ma.gov
10 Main Street
North Adams, MA 01247

b. Chief Executive
Jennifer Macksey, Mayor
413-662-3001
MayorMacksey@northadams-ma.gov
10 Main Street
North Adams, MA 01247

6. Population – 12,961

7. Other Factors Checklist

Other Factors	Page #
Community population is 10,000 or less.	4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The priority brownfield site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	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).	1-4, 6 & 8
The priority site(s) is in a federally designated flood plain.	1,2 & 4
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3

The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	1-3 & 5
The target areas(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	

8. Releasing Copies of Applications - Not applicable

RANKING CRITERIA FOR CLEANUP GRANTS

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

The City of North Adams, located in Berkshire County, Massachusetts (the westernmost county in the state), is an historic mill town nestled at the foot of Mount Greylock at the confluence of four mountain ranges. Decidedly rural in nature, it is also the smallest incorporated city in Massachusetts, with a current population just under 13,000. North Adams was a prosperous manufacturing community throughout the 19th and 20th centuries until the 1985 closure of Sprague Electric eliminated 4,000 jobs. Despite this devastating socioeconomic blow, community leaders collaborated with nearby Williams College in the late 1980s to reimagine the Sprague mill as the Massachusetts Museum of Contemporary Art (MASS MoCA). Opened in 1999, the 16-acre MASS MoCA museum and performance complex draws nearly 300,000 visitors each year. However, generational poverty is persistent, the unemployment rate is consistently double that of the State average and North Adams has the lowest median income in Berkshire County.

1.a. **Target Area and Brownfields**

1.a.i. **Overview of Brownfield Challenges and Description of Target Area**

The City of North Adams faces a number of brownfields challenges with a multi-century history of manufacturing visible in the former mill sites throughout the City. Sadly, the City is also impacted by the invisible contamination left behind by these now obsolete industries. This negative environmental legacy must be undone so that the community may move toward its vision for the future centered on culture, economic diversity, and outdoor recreation.

The specific target area where grant activities will be performed includes the federally registered historic mill village of Blackinton within census tract 25003921500. This grant will help to address specific brownfields challenges and the negative impacts of historic industry by remediating an undeveloped, former tannery dumping ground that lies at the center of both a residential neighborhood and multiple, ongoing public and private redevelopment projects that cannot proceed without remediation. The Former Tannery Dump (the Site) currently blocks circulation between the transformative TOURISTS hotel project (touristswelcome.com) and the historic Blackinton Mill, the next redevelopment phase in the TOURISTS resort master plan. Additionally, the route for the North Adams Adventure Trail, the proposed multi-use path connecting existing regional bike paths to the west and south, must run through this tannery dump property. From a broader environmental perspective, the existence of this dump in the Hoosic River flood plain poses an ever-increasing risk to the ecological health and climate resilience of the watershed.

1.a.ii. **Description of the Brownfield Sites**

The Site is listed under the Massachusetts Contingency Plan as “Former Tannery Dump” (RTN-1-20141). The Site was never a formally recognized dump but was rather a dumping ground for the Barber Leather Co. and Widen Tannery that operated in Blackinton in the 19th and 20th century. After an Army Corps of Engineers dam project in the late 1950s cut off the water supply to the tannery and ultimately forced it out of business, piles of spoiled hides and leather scraps, some contaminated with hazardous substances, were dumped on this vacant parcel in the early-mid 1960s. The Site, now re-vegetated, contains a 1.5-acre, 10 foot high mound of contaminated

leather scraps directly abutting the Hoosic River and recent extreme storms have exposed the layers of leather in the riverbank. No longer out of sight and out of mind, the Site must be remediated to achieve forward-looking environmental and economic goals. Comprehensive environmental assessments conducted at the Site identify hazardous materials, primarily identifying arsenic, chromium, and lead in soil and sediments along with the scrap hides.

1.b. Revitalization of the Target Area

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

The primary reuse strategy for the Site focuses on the development and construction of the Adventure Trail – a pedestrian/bike path through the City that will connect to existing regional trails. This 3.3 mile path between Williamstown and downtown North Adams, first contemplated in 1896 (not a typo), will creatively link community assets and increase public access to abundant, yet under-leveraged, natural resources. Addressing community needs of economic vitality, alternative transportation, public wellness, and climate resilience, it will address vital needs of the existing population while also attracting new generations to visit, explore, and settle.

The reuse strategy aligns with and advances the North Adams Comprehensive Plan "Vision 2030" which outlines the historic harm inflicted by deindustrialization, urban renewal, and environmental injustices. The plan identifies increasing outdoor recreation tourism, specifically via a multi-use public trail, in its Economic Development and Open Space/Recreation priorities. The City, with sustained and significant public participation, has been actively pursuing a pedestrian/bike path connecting various neighborhoods, businesses, and visitor attractions for over two decades. The long hoped-for trail is the missing link in a network of existing regional bike paths, most of which are rail-to-trail. However, the rail lines in North Adams remain active, and a more challenging solution is required to establish a path through the City. After 20 years of investment and collaboration by the City *and* the community, a viable route has finally been identified and remediation of the former tannery dump site is critical to make the Adventure Trail a reality. Remediation will not only allow for the development of the Adventure Trail but will also remove the latent risk of exposure to contaminants that threaten public health and the ecological health of the River. Furthermore, the removal of scrap hides and contaminated soils will create additional flood storage capacity in a federally designated flood plain, which is critical as the City – historically prone to flooding – struggles to adapt to the impacts of climate change.

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

As previously stated, the proposed project will facilitate the creation of the Adventure Trail – a publicly accessible greenway – that will create jobs and stimulate economic growth and development in the target area upon completion of the cleanup of the Site. The Adventure Trail is recognized as vital priority project for the Commonwealth of Massachusetts, the Berkshires and the local community. It will reimagine ecological assets, catalyze economic activity and public/private investment, expand opportunities for community recreation and healthy living, and become a powerful attractant to young, talented people considering making Massachusetts and the Berkshires their home. It will serve as an efficient, climate-forward route for visitors and commuters between historically intertwined communities and connect important art and educational institutions to an array of existing and nascent private development.

The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments. The remediation will support community efforts to become more resilient to climate change impacts by incorporating adaptation and mitigation strategies throughout the cleanup and redevelopment process. Specifically, the remediation will remove the layers of leather hides that are currently being exposed along the riverbank and consolidate and cap the hides further inland. As part of the remediation, the riverbank will be stabilized and reinforced, adding flood storage capacity and mitigating ongoing climate change impact, particularly the risk of erosion and additional downstream impacts.

The reuse will not facilitate renewable energy from wind, solar, or geothermal energy; however, the City intends to incorporate the use of field machinery equipped with clean-emission technology for exhaust systems and energy-efficient field equipment.

1.c. Strategy for Leveraging Resources

1.c.i. Resources for Site Characterization

Significant resources have been devoted to site characterization since the 1980s. Both MA DEP and EPA performed testing activities on the site between 1987 and 1996. In 2015, Blackinton Backwoods LLC, a related entity of the adjacent TOURISTS resort, signed an option agreement to purchase the parcel. In 2016, Blackinton Backwoods hired Tighe & Bond to perform a new Phase I, Phase II, Phase III, and IRA Completion Report that was completed in 2017 and provided to the City. Plans to apply for EPA Brownfields funds in 2018 were hindered by the 2018 Federal shutdown. Funding for additional assessment, including a Stage II Environmental Risk Characterization, has been provided by Berkshire Regional Planning Commission (BRPC) in 2023.

1.c.ii. Resources for Site Remediation

Based on abundant available data, it is believed that the funds requested in this application will be sufficient for remediation. In the event that unforeseen additional funds are required, support will be secured from MassDevelopment and/or from BRPC's revolving loan fund.

1.c.iii. Resources for Site Reuse

Remediation will create publicly accessible greenspace and enable two transformative community projects – the long-awaited Adventure Trail and the redevelopment of the adjacent Blackinton Mill as part of the TOURISTS resort. Significant public and private funding and effort is devoted to these two projects. The state has invested in the Adventure Trail and the Mill redevelopment through Historic Rehabilitation Tax Credits, a \$300K MassTrails grant for trail route survey, and \$4.5M in MassWorks infrastructure grants to build a future trailhead and create the unique passage for the trail through the Blackinton Mill campus. The TOURISTS project has invested over \$25M in the existing resort and will invest another \$20M (aided by a secured local TIF) in the Mill. While MA DOT will utilize state and federal funds to construct the Adventure Trail, over \$3M in private funds have been secured to support design/engineering.

1.c.iv. Use of Existing Infrastructure

Additional infrastructure and upgrades are not needed to advance the revitalization plans for the Site. Site reuse centers on the development of a publicly accessible greenway, which does not

require additional infrastructure. Existing public infrastructure is available to support redevelopment projects within the target area.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

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

North Adams is unable to draw on other initial sources of funding to carry out environmental remediation and access future funds for Site reuse. The City has experienced decades of disinvestment and population loss and meets the definition of an Economically Disadvantaged Community using Department of Revenue mapping tools for Historically Disadvantaged Communities. The target area is designated as Extreme Distress with income at 57% of Area Median Income. According to CEJST, the target area is considered disadvantaged because it “meets more than 1 burden threshold and associated socioeconomic threshold”. The target area has a low population of just 2,877 and the target community is within the 72nd percentile where household income is less than or equal to twice the federal poverty level. Generational poverty is persistent, median income is the lowest in the County and in the bottom 5% of the state.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

The target area is an underserved community with identified sensitive populations that include children, women of child-bearing age, people over age 65, and people with disabilities. The welfare of sensitive populations is impacted by lower education levels with 13% of people ages 25 years or older having a high school education or less. Welfare is further impacted by a lack of prosperity evidenced by the fact that the target area is within the 86th percentile for unemployment and the 72nd percentile for income less than or equal to twice the federal poverty level. According to CEJST, the share of homes within the target area that are likely to have lead paint is over the 90th percentile and the EJScreen Tool identifies the target area as a food desert.

Environmental Site Assessments conducted at the Site identify hazardous materials, primarily identifying arsenic, chromium, and lead in soil and sediments along with scrap hides, which are known to cause immune, cardiovascular, developmental, gastrointestinal, neurological, reproductive, respiratory and kidney damage; nausea and stomach pain; blood disorders; nerve damage; skin disease; and cancer. The remediation of the Site will address the risk of exposure and reduce threats to the health or welfare of sensitive populations by permanently removing impacted sediments in the stream channel and flood plain cutting off the exposure pathway. Furthermore, targeted excavation of the buried hides and impacted soil along the bank of the Hoosic River will reduce potential impacts to the river and create needed flood storage capacity.

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

Together this grant and the planned Site reuse will address threats to populations in the target area that suffer from a greater-than-normal incidence of diseases or conditions (including cancer, immune, cardiovascular, developmental, gastrointestinal, neurological, reproductive, respiratory and kidney damage) that may be associated with exposure to metals. According to the health indicators in the EJScreen Tool, the target area is in the 91st percentile for persons with

disabilities, 89th percentile for asthma, 82nd percentile for cancer and 81st percentile for heart disease. The cleanup activities conducted under this grant will protect against exposure and reduce the threats associated with contamination that can lead to adverse health conditions.

(3) Environmental Justice

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

The target area is a disadvantaged census tract that meets more than 1 burden threshold and the associated socioeconomic threshold. The community has historically experienced disproportionate and adverse environmental, human health, climate-related and other cumulative impacts, as well as the accompanying economic challenges of such impacts. These disproportionate and adverse impacts resulted in part from the industrial history of the Site.

(3)(b) Advancing Environmental Justice

This project and the planned reuse will advance environmental justice through the fair treatment and meaningful involvement of all people regardless of race, color, national origin, or income. The reuse will provide a public amenity, an alternative method of travel for residents within the target area to work, medical care and community services, and increased health benefits associated with physical/outdoor activity. The reuse will not displace residents and/or businesses among the underserved communities in the target area. Environmental justice will be supported through an equitable development approach and intentional strategies to ensure that underserved communities, and other communities with environmental justice concerns can participate in and benefit from decisions that shape their neighborhood. The remediation will prioritize local or first-source hiring of contractors or subrecipient employees as allowable by law and by the terms and conditions of the grant. The remediation will also facilitate participation by disadvantaged businesses pursuant to 40 CFR Part 33.

2.b. Community Engagement

2.b.i. Project Partners & 2.b.ii. Project Partner Roles

Northern Berkshire Community Coalition (nbCC): nbCC has a long history of facilitating community-wide meetings and focus groups on topics of interest to the community. Their mission is “to enhance the quality of life through our efforts at connecting, convening and supporting all facets of the community”. nbCC has facilitated listening sessions for the Hoosic River Revival organization in its work with the Army Corps of Engineers on modernization of flood control on the Hoosic River as well as listening sessions for the cleanup of the former Sun Cleaners in North Adams. They are ideally situated to assist the City in community engagement activities for cleanup of the former Tannery Dump and development of the Adventure Trail. nbCC will arrange, host and facilitate community-wide meetings and focus groups to inform and engage the community while also collecting valuable input that will inform the remediation and redevelopment of the Site. Contact - Amber Besaw, abesaw@nbccoalition.org.

Hoosic River Revival (HRR): HRR has worked with engineers and urban planners since 2010 to assess the 70 year old flood control system, and to develop options for system modernization that would ensure flood mitigation but also improve the health of the river and create corridor

enhancements, such as bike paths and accessibility to the river. HRR is a volunteer organization that works to accomplish its mission through advocacy, education, and action in partnership with the City of North Adams and other stakeholders. HRR will continue its partnership with the City through advocacy and education. Contact - Carole Ridley, cr@ridleyandassociates.com.

2.b.iii. Incorporating Community Input

The City will seek active participation and input from the community. The Office of Community Development will be an on-going resource and provides a mechanism with which the community can provide input. Public discussions held as part of regular televised meetings of the City Council, nbCC monthly forums, and other meetings involving members of the public are a tried-and-true method for engaging the community. Public meetings will be held to seek input on the proposed work plan and inform the public about planned activities and their results. Participation will be solicited through various media and outreach through the project partners.

The City has a mailing list of every property owner within the target area and will send mailings regarding upcoming meetings on the project's progress. The City will work in partnership with other organizations and community stakeholders, including nbCC and HRR. Community meetings will include an open dialogue and provide an opportunity for crucial feedback on the remediation strategy and the public objectives of the reuse plan. Community meetings and various media will also keep the community informed with regard to how their input is being incorporated.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The cleanup plan proposed for the Site is targeted excavation with offsite disposal and an AUL. After creating safe access to excavate the sediments in the stream channel and/or wetland areas with the use of fiber mats or similar to provide a safe working base for the excavation equipment, the material would be removed by standard earth-moving equipment (excavator or backhoe). The sediments would likely need to be dewatered prior to disposal.

The soil of the hide mound along the riverbank will include strategic excavation beginning in the south where the existing grade is generally flat leading up to the hide mound and closest to the anticipated access point for excavation equipment via the former sewerage treatment facility adjacent to the east of the Site. Targeted excavation would continue north until the impacted soil is removed along the bank of the Hoosic River. Based upon current estimates, the hide mound along the river is approximately 200 feet long by 25 feet wide, by 8 feet high = 56,000 CF = 2,100 CY. However, the mound isn't rectangular, with varying slopes on each side reducing the overall volume, so it's assumed that three quarters of this volume exists, or approximately 1,575 CY, which will require offsite disposal. We estimate approximately half of the material will be suitable for disposal at an out-of-state landfill as non-hazardous material and the remaining half will be disposed out of state as hazardous waste. The remaining contamination would be consolidated to approximately 60,000 SF and isolated/capped with two feet of clean imported material (or natural vegetation in undisturbed areas).

3.b. Description of Tasks/Activities and Outputs

Task 1: Cooperative Agreement Oversight:
3b.i. Project Implementation: The City has solicited the services of BRPC to serve as grant manger and a Qualified Environmental Professional (QEP) will be procured in accordance with applicable procurement laws. BRPC will ensure that all federal cross-cutting measures are met. Required EPA quarterly reports, updates to the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database and requests for reimbursement will be prepared and submitted by the BRPC with assistance from the QEP. A member of the project team will attend the National EPA Brownfields Conference.
3.b.ii. Anticipated Project Schedule: 10/1/24 – 9/30/28
3.b.iii. Task/Activity Lead(s): BRPC with QEP support
3.b.iv. Outputs: <ul style="list-style-type: none"> • Signed contract with a QEP that meets the recipient’s and EPA’s expectations • 16 quarterly reports and MBE/WBE reporting
Task 2: Community Outreach & Engagement:
3b.i. Project Implementation: The City will engage the community surrounding the Site, local neighborhood groups, lenders, realtors, property owners, developers, community health officials, throughout the cleanup process. The selected QEP will develop a Community Relations Plan (CRP) and prepare and advertise an Analysis of Brownfield Cleanup Alternatives (ABCA). The City will hold a public meeting to discuss the Draft ABCA and solicit comments and encourage participation from the community on the proposed cleanup plan. Supplies will include meeting flyers, handouts for public meetings and site factsheets.
3.b.ii. Anticipated Project Schedule: 10/1/24 – 9/30/28
3.b.iii. Task/Activity Lead(s): The City and BRPC
3.b.iv. Outputs: <ul style="list-style-type: none"> • CRP, Final ABCA, meeting minutes, presentation materials, and fact sheets.
Task 3: Site-Specific Activities:
3b.i. Project Implementation: The QEP to develop site-related documents pertaining to cleanup and costs related to the actual cleanup of the Site. The QEP will prepare a Site-specific Quality Assurance Project Plan (QAPP) and a Health and Safety Plan (HASP) for review and approval by EPA prior to the commencement of work. The QEP will also prepare a Release Abatement Measure (RAM) Plan and Soil Management Plan (SMP) describing proper soil excavation, management, and offsite soil disposal procedures in compliance with the Massachusetts Contingency Plan (MCP) prior to the commencement of cleanup.
3.b.ii. Anticipated Project Schedule: 1/1/25 – 12/31/27
3.b.iii. Task/Activity Lead(s): QEP
3.b.iv. Outputs: <ul style="list-style-type: none"> • Site specific QAPP, RAM Plan, SMP, technical specifications

Task 4: Oversee Site Cleanup:
4b.i. Project Implementation: The QEP will conduct environmental oversight and monitoring during cleanup activities to ensure the cleanup is being conducted according to the technical specifications and all federal, state, and local laws. Upon completion of cleanup, a RAM Completion Report will be submitted to MassDEP.
4.b.ii. Anticipated Project Schedule: 1/1/25 – 8/30/28
4.b.iii. Task/Activity Lead(s): QEP
4.b.iv. Output(s): <ul style="list-style-type: none"> · RAM Completion Report

3.c. Cost Estimates

Only costs to be covered by EPA grant funds are included within the cost estimates and within the budget table. Funding resources that will be leveraged to meet the remediation budget are discussed under Section 1.c.i. and 1.c.ii. *Resources Needed for Site Characterization and Remediation*

Task 1 – Cooperative Agreement Oversight

Contractual: Grant management expenses of \$16,000 plus QEP expenses of \$6,000 = \$22,000.
Travel: A member of the project team will attend the National EPA Brownfields Conference one conference attendee: airfare/lodging/per diem = \$3,000.

Task 2 – Community Outreach & Engagement

Contractual: Grant management expenses of \$15,000 and QEP expenses of \$7,000 = \$22,000.
Supplies: Meeting and informational materials (\$200 per meeting x 5 meetings = \$1,000).

Task 3 – Site-Specific Activities

Contractual: Grant management expenses of \$9,000 to ensure all federal cross-cutting measures are met, assistance to procure cleanup contractors, and conduct Davis Bacon wage monitoring. QEP expenses of \$15,000 to prepare specifications for cleanup, prepare a RAM Plan, and SMP.
Construction: Cleanup expenses of \$1,770,000: \$1,255,650 for transportation and disposal of contaminated sediments and contaminated soils along the southern portion of the hide mound along the bank of the Hoosic River (1,575 CY x 1.5 tons/CY x \$475/ton as a blended rate of non-hazardous and hazardous disposal taking into consideration the expense involved with disposing of waste hides, haz waste fee in MA (\$57/ton x 1,200 tons), and excavation and loading cost (avg \$30/CY x 1,575 CY) and \$337,500 for consolidation and capping of the remaining contamination with two feet of clean imported material (60,000 ft² of area to be capped x 2 ft = 120,000 ft³ = 4,500 CY x 1.5 tons/CY x \$50/ton), \$70,000 for river bank stabilization (e.g., rip-rap stone and native plantings) and a total of \$86,850 for extensive environmental permitting and \$20,000 for implementing an AUL (including licensed land surveyor).

Task 4 – Oversee Site Cleanup

Contractual: Grant management expenses of \$8,000 and QEP expenses of \$50,000 for monitoring and confirmatory sampling (\$40,000) and prepare a RAM Completion Report (\$10,000).

Budget Categories		Project Tasks (\$)				Total
		Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach & Engagement	Task 3 Site- Specific Activities	Task 4 Oversee Site Cleanup	
Direct Costs	Personnel					
	Fringe Benefits					
	Travel	\$3,000				\$3,000
	Equipment					
	Supplies		\$1,000			\$1,000
	Contractual	\$22,000	\$22,000	\$24,000	\$58,000	\$126,000
	Construction			\$1,770,000		\$1,770,000
	Other					
Total Direct Costs		\$25,000	\$23,000	\$1,794,000	\$58,000	\$1,900,000
Indirect Costs						
Total Budget (Total Direct Costs + Indirect Costs)		\$25,000	\$23,000	\$1,794,000	\$58,000	\$1,900,000

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

The City has solicited the services of BRPC for grant management through a competitive procurement process. BRPC will work with the City to track, measure and evaluate progress in achieving project outcomes, outputs and project results. We will develop a Workplan for approval by EPA Region 1 which will outline anticipated outputs and outcomes, which will be tracked in the quarterly and final reports. BRPC will utilize the Assessment, Cleanup and Redevelopment Exchange System (ACRES) to report, document, and track information such as funding received, contamination present, acres cleaned up, acres redeveloped and funds leveraged. The City and BRPC will also work closely with our Project Officer, and selected QEP.

4. Programmatic Capability and Past Performance

4.a. Programmatic Capability

4.a.i.-ii Organizational Structure and Description of Key Staff

The City of North Adams has the structure in which to successfully implement this Brownfield’s project and strongly believes that it has a solid team that has generated a significant and proven track record of performance across many disciplines. The City’s Office of Community Development (OCD) typically secures \$1M to \$2M annually. OCD will be responsible for overseeing contractors to ensure the completion of all requirements of the grant.

The OCD Director acts as the City's principal agent in securing state and federal grants for community development initiatives, supervises the office's professional and administrative staff, initiates, formulates, plans and develops proposals and projects for community development activities, negotiates and coordinates the work of local citizen organizations, private institutions

and official agencies, boards and commissions for maximum effectiveness for the planning and pursuit for all types of community and economic development projects. He is also heavily involved in the daily project management, oversight and reporting for all projects that are awarded funds. The present Director has been with the municipality since 1987.

As stated previously, the City has procured the services of BRPC to serve as the grant manager. BRPC has dedicated and experienced staff responsible for meeting the requirements of state and federal agencies. BRPC has a significant amount of experience working under Brownfields Clean Up and Assessment Grants and has a strong track record. BRPC has provided grant management services for nine Brownfields Clean Up and Assessment Grants and one Brownfields Area-Wide Planning Grant awarded to municipalities within Berkshire County. BRPC has been directly awarded and managed seven EPA Brownfields Assessment Grants. BRPC will assign Melissa Provencher, Environmental & Energy Program Manager to provide grant management and administration services to the City. Ms. Provencher has been with BRPC for 24 years and has managed and grown BRPC's Brownfields Program since 2008.

4.a.iii. Acquiring Additional Resources

As demonstrated above, the City is able to acquire additional resources and has already done so by procuring the services of BRPC. The City will work with BRPC to hire a QEP and a remediation contractor. The City has worked with BRPC to successfully contract with a QEP in the past. The City and BRPC will follow all state and federal procurement laws and regulations.

4.b. Past Performance and Accomplishments

4.b.i. Currently or Has Ever Received EPA Brownfields Grants

(1) Accomplishments

Most recently, the City was awarded a 2017 Brownfields Assessment Grant. In 2008, the City was awarded a Brownfields Cleanup Grant. Hazardous substances grant funds were used to clean up a 1.9-acre former Berkshire Tannery site on Ashton Avenue in the Blackinton neighborhood. The prior cleanup took place on a parcel northwest of the location of the dumping site that is the subject of the proposed project. The 2008 cleanup grant included remediation of soil and groundwater contaminated with metals and volatile organic compounds. This Cleanup Grant was successfully managed with the remedial work being completed in 2010. The grant period was extended from 2010 to 2012 in order to conduct continued ground well monitoring.

(2) Compliance with Grant Requirements

The 2008 cleanup grant was successfully managed and closed in 2012. The 2017 grant was extended due the COVID-19 pandemic. The grant was successfully managed, completed and closed in 2022. The City met the reporting requirements, reported on the expected outputs and outcomes and submitted final technical reports. The City utilized ACRES to document and track funding received and contamination present. There funds remaining when the grant closed (\$7,613.50). The funds remaining were petroleum dollars and we were unable to identify an eligible petroleum site with assessment needs that aligned with our available funds. The City worked closely with our EPA Project Officer on our progress and compliance and work toward expending the remaining funds to the best of our ability.

Threshold Criteria Responses and Attachments

Threshold Criteria for Cleanup Grants

1. **Applicant Eligibility**

The City of North Adams, Massachusetts is eligible for funding and is a General Purpose Unit of Local Government as defined under 40 CFR Part 31.

2. **Previously Awarded Cleanup Grants**

The proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

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

The City of North Adams does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership**

The City of North Adams owns fee simple title to the property located at Ashton Ave., North Adams, MA ("Site"). Book 1840 Page 1096

5. **Basic Site Information**

(a) The name of the Site is "*Former Tannery Dump*"

(b) The address of the Site is Ashton Avenue, North Adams, MA 01247

(c) The City of North Adams is the owner.

6. **Status and History of Contamination at the Site**

(a) The Site is contaminated by hazardous substances.

(b) The property targeted for cleanup is a former dumping site for the Barber Leather Co. and Widen Tannery in the historic village of Blackinton. The Site is currently vacant and there are no structures on the Site.

(c) The environmental concerns include hazardous materials, primarily identifying arsenic, chromium, and lead in soil and sediments along with scrap hides.

(d) The Site contains a ~1.5-acre mound of leather scraps contaminated with heavy metals dumped over a period of time, predominantly in the 1960s. Approximately 10 feet high, the mound abuts the Hoosic River and extreme storms have exposed the layers of leather on the riverbank.

7. **Brownfields Site Definition**

(a) The Site is not listed or proposed for listing on the National Priorities List.

(b) The Site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.

(c) The Site is not subject to the jurisdiction, custody, or control of the United States Government.

8. Environmental Assessment Required for Cleanup Proposals

Initial assessment investigations were performed at the site beginning in 1987 and continued through approximately 1991. Then extensive assessment was performed in 2016/2017 under the Massachusetts Contingency Plan (310 CMR 40.0000) as documented in a Phase I – Initial Site Investigation/Phase II – Comprehensive Site Assessment/Phase III – Evaluation of Remedial Action Alternatives/Immediate Response Action Completion Report, dated December 2017. This comprehensive report documents the assessment of oil and hazardous materials (OHM) at the Site, primarily identifying arsenic, chromium, and lead in soil and in stream and wetland sediments along with scrap hides.

9. Site Characterization

A current letter from the appropriate State or Tribal Environmental Authority is attached.

10. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which brownfields funding is sought.

11. Sites Requiring a Property-Specific Determination

The Site does not require a property-specific determination to be eligible for federal funding.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

12.a.iii.(1) Bona Fide Prospective Purchaser Liability Protection

(a) Information on the Property Acquisition

- (i) The City of North Adams purchased the property from a private party
- (ii) The City of North Adam acquired the property on 11/10/23
- (iii) The City of North Adams holds fee simple title.
- (iv) The parcel was purchased from C.P. Development Corp.
- (v) The City has no relationships or affiliations with any prior owners.

(b) Pre-Purchase Inquiry

- (i) The City of North Adams performed an ASTM E1527-21 Phase I for Site in a Phase I report dated October 27, 2023.
- (ii) The ASTM E1527-21 Phase I was performed by Nicole Hudson and Tom Biolsi of Roux Associates, Inc. Both Ms. Hudson and Mr. Biolsi meet the definition of an Environmental Professional as defined in §312.10 of 40 CFR 312 with 14 years and 26 years of environmental consulting experience, respectively.
- (iii) The ASTM E1527-21 Phase I was conducted within 180 days prior to acquisition of the property.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the site occurred before the City of North Adams acquired the property and the City did not cause or contribute to any release of

hazardous substances at the site. The City has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses

The Site has not been actively used by the City or by any persons or entities since the City acquired ownership on 11/10/23 through the present time.

(e) Continuing Obligations Describe in detail the reasonable steps you took with respect to hazardous substances found at the site to:

- (i) There were no continuing releases at the Site to stop and the City of North Adams is complying with applicable MassDEP and city requirements.
- (ii) Access is controlled via natural barriers (e.g., Hoosic River, steep slope, active rail line, dense vegetation) and ongoing redevelopment work across the rail lines at the Blackinton Mill to prevent any threatened future release; and
- (iii) Exposure to the documented contamination is limited by controlling access via the development of informal walking trails with raised wooden planks in low-lying areas coupled with natural dense vegetation across the remainder of the Site and restricted access via natural barriers (e.g., Hoosic River, steep slope, active rail line).

The City of North Adams is committed to:

- (i) complying with any land use restrictions and to not impede the effectiveness or integrity of any institutional controls;
- (ii) assisting and cooperating with those performing the cleanup and providing access to the property;
- (iii) complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- (iv) providing all legally required notices.

13. Cleanup Authority and Oversight Structure

- (a) The Site is currently enrolled in the Massachusetts Contingency Plan (“MCP”) and will be cleaned up in accordance with the requirements of the MCP. The MCP is the Commonwealth’s cleanup program created under Massachusetts General Law Chapter 21E. Mass DEP oversees the MCP and will provide technical assistance, oversight and review of all cleanup activities at the Site. Release Tracking Number 1-20141 is associated with the site.
- (b) Access through the adjacent property to the northwest (the former tannery property) is not needed as it is owned by the City of North Adams. The owner of the adjacent/neighbor property to the north (the former Blackinton Mill), to the south across the Hoosic River (TOURISTS hotel), and to the east (former wastewater treatment plant) has granted the City of North Adams access to the Site through their property. No additional access is needed.

14. Community Notification

(a) Draft Analysis of Brownfield Cleanup Alternatives

The applicant allowed the community an opportunity to comment on the draft proposal, including an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA). The draft ABCA(s) briefly summarized information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered (for each alternative and the alternative chosen include information on the effectiveness, the ability of the grantee to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness); and
- the proposed cleanup.

(b) Community Notification Ad

The City of North Adams provided the community, including those within the Target Area, with notice of its intent to apply for an EPA Cleanup Grant on October 27, 2023. The notice indicated that the City is seeking public comment on the draft proposal and draft ABCA and that copies of the draft proposal and draft ABCA are available at the Office of Community Development, Room #107 at City Hall and online at the City's website. The advertisement also announced that a public meeting would be held on November 6, 2023 at 6:00PM, during which public comments will be accepted. The public were able to submit comments in person and via email.

(c) Public Meeting

On November 6, 2023 at 6:00PM, the City accepted public comments on the draft proposal and draft ABCA. Representatives of the City and the QEP were present in person and virtually to provide detailed information and answer questions. A Summary of the Community Meeting is attached - one person attended the meeting, no comments were received and no responses were needed. Due to the nature of the hybrid meeting, there was no sign-in sheet. The single person attending was Tammy Daniels representing I-Berkshires News.

(d) Submission of Community Notification Documents

A copy of the draft ABCA, the public notice and solicitation for comments on the proposal, and a Summary of the Community Meeting held on November 6, 2023 is attached and no comments were received.

15. Contractors and Named Subrecipients

The City of North Adams has not named a Qualified Environmental Professional or remediation contractor. The City will follow all state and federal procurement laws to secure these services.

The City of North Adams has procured a contractor for grant management that will be compensated with EPA funds made available under this RFA. The City of North Adams sought quotes through a written Request for Quotes. The Request for Quotes was sent via email to four vendors. Responses to the Request for Quotes were due 1.5 weeks after the Request for Quotes was sent. Three vendors respectfully declined. A response was received from the Berkshire Regional Planning Commission (BRPC). The City awarded the contract to BRPC and an award letter is attached hereto. Please note that the City is not able to enter into an intermunicipal agreement with BRPC before the funds have been awarded. However, we have clearly stated our intention to do so BRPC once funding is awarded. Please note that Massachusetts procurement law has a provision which allows municipalities to enter into intermunicipal agreements with regional planning agencies and governs such agreements.



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

November 3, 2023

Via Email

Mayor Jennifer A. Macksey
City of North Adams
10 Main Street
North Adams, MA 01247

RE: STATE LETTER OF ACKNOWLEDGMENT
City of North Adams – Brownfields Cleanup Grant
Tannery Dump Massachusetts Avenue, North Adams [RTN 1-20141]

Honorable Mayor Macksey:

I am writing to support the application submitted by the City of North Adams under the Fiscal Year 2024 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. We understand that the City of North Adams is proposing to undertake cleanup activities at a portion of the former R.J. Widen Tannery where hides were tanned and occasionally dumped. This cleanup will facilitate the development of the North Adams Adventure Trail, a bike path connecting the Williamstown bike path to downtown North Adams at Mass MoCA.

It is the understanding of the Department that the City is undertaking environmental response actions as the owner of the property, and the property is enrolled in the Massachusetts voluntary cleanup program. According to information provided by the City and their consultant, the level of assessment conducted to date is sufficient to design and initiate the proposed cleanup activities.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available resources and incentives. The Massachusetts Department of Environmental Protection (MassDEP), through our regional offices, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to support the City of North Adams to help make this project a success.

We greatly appreciate EPA's continued support of Brownfield efforts in Massachusetts.

Sincerely,

David Foss, CPG, LSP

Statewide Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Dorrie Paar, US EPA
Katherine Eade, Administrative Officer - City of North Adams
Caprice Shaw, MassDEP Western Regional Office