



**Jay Pateakos**  
*Executive Director*

# ***CITY OF TAUNTON***

## **OFFICE OF ECONOMIC AND COMMUNITY DEVELOPMENT**

15 Summer Street, Suite 302  
Taunton, MA 02780  
Phone: 508-821-1030

R01-24-C-012

**Jim Howland**  
*Assistant Director*

### **City of Taunton, Massachusetts - Narrative Information Sheet USEPA FY24 Brownfields Cleanup Grant Application**

1. Applicant Identification: City of Taunton  
15 Summer Street  
Taunton, Massachusetts 02780
2. Funding Requested:
  - a. Cleanup Grant Type: Single Site Cleanup
  - b. 395 West Water Street Taunton, MA
  - c. Federal Funds Requested: \$1,000,000
3. Location: Taunton, Bristol County, Massachusetts
4. Property Information: Bacon Felt Manufacturing, 395 West Water Street,  
Taunton, Massachusetts 02780
5. Contacts:
  - a. Project Director: Jay Pateakos, Executive Director  
City of Taunton, OECD  
15 Summer Street, Suite 302  
Taunton, Massachusetts 02780-3056  
Telephone: 508-821-1030  
Email: [JPateakos@taunton-ma.gov](mailto:JPateakos@taunton-ma.gov)
  - b. Chief Elected Official: Shaunna O'Connell, Mayor  
City of Taunton  
15 Summer Street, Suite 400  
Taunton, Massachusetts 02780  
Telephone: 508-821-1000  
Email: [soconnell@taunton-ma.gov](mailto:soconnell@taunton-ma.gov)
6. Population: 59,922 (Census.gov)

7. Other Factors Checklist:

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	<i>N/A</i>
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	<i>N/A</i>
The proposed brownfield site(s) is impacted by mine-scarred land.	<i>N/A</i>
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse: secure resources is identified in the narrative and substantiated in the attached document.	<i>N/A</i>
The proposed 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).	<b>2,5-6</b>
The proposed site(s) is in a federally designated flood plain.	<b>2,5-6</b>
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	<i>N/A</i>
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	<b>4</b>
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	<b>4</b>
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	<i>N/A</i>

8. Releasing Copies of Applications. Any statements on the tax-delinquency status of certain properties is considered confidential.

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

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

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

Founded in 1639, the City of Taunton, Massachusetts is among the oldest municipalities in the United States. Located approximately 40 miles south of Boston, and 18 miles east of Providence, Rhode Island, the city spans across 47.29 square miles, making Taunton the largest city by land area in Massachusetts<sup>1</sup>. Taunton has been designated one of Massachusetts' 26 'Gateway'<sup>2</sup> cities. Gateway cities are so named because they provided communities with good jobs and a "gateway" to the American dream during the industrial age. Taunton was once a regional and national leader in many industries including bog iron, shipbuilding, textiles, stoves, locomotives, and perhaps most notably, silver. Taunton, like the rest of the Gateway Cities, has faced extreme challenges in both rebounding economically, as well as coping with the environmental footprint, stigma, and contamination left behind from this era of industry, which hinders and impedes redevelopment and revitalization.

Our target area is within the Weir Village, an urban neighborhood with a mix of residential, commercial, and industrial properties in a relatively dense area. Residents in the target area are considered Environmental Justice (EJ) Communities, representing racial and ethnic minorities and individuals who live in households that have a median household income of 65% or less than the state median household income.<sup>3</sup> The census tracts in our target area have also been identified as having more the 100 households without access to a vehicle and are more than ½ mile from the nearest supermarket.<sup>4</sup> With an abundance of land available for remediation and redevelopment, the Weir Village is poised to be an up and coming neighborhood.

Funding to clean up the priority site would allow for the City of Taunton to safely remove the hazards which exist in the neighborhood, their impact on abutting properties and waterways, and determine the best and safest course of remediation, giving way to planning for clean-up and eventual economic redevelopment, job creation, housing, repurposed buildings and infrastructure, and recreational space in this community. As a community, with limited transportation access, walkability to nearby grocery stores and other amenities is crucial for the health and wellbeing of its residents.

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

For over 200 years, the Weir has been home to a variety of industrial sites including Yankee Chemical, Sheridan Silversmiths, Robertson Curtain Factory, F.B. Rogers Silversmiths, Staples Coal, Weir Stove Corporation, Bacon Felt and Nu-Brite Paint and Chemical. Many of these sites have been determined to have air, water, and soil contaminants including lead paint, asbestos, cyanide and heavy metals such as copper, silver and zinc, and various volatile organic compounds linked to adverse health impacts. The Weir Village Riverfront Park was constructed

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<sup>1</sup> Secretary of the Commonwealth of Massachusetts: "Information and Historical Data on Cities, Towns and Counties in the Commonwealth of Massachusetts". <https://www.sec.state.ma.us/cis/cisctlist/ctlistidx.htm>

<sup>2</sup> A Gateway city is defined by the Commonwealth of Massachusetts as being mid-sized urban centers with populations between 35,000 – 250,000, with an average household income below the state average, and an education attainment rate (bachelors or above) that is below the states average.

<sup>3</sup> <https://www.mass.gov/info-details/environmental-justice-populations-in-massachusetts#interactive-maps-about-environmental-justice-populations>

<sup>4</sup> <https://www.ers.usda.gov/data-products/food-access-research-atlas/go-to-the-atlas/>

on the site of the former F.B. Rogers Silver and Weir Stove factories on West Water Street in 2017 as part of a successful Brownfield remediation project, but the Weir Village has additional properties threatening the health and economic vitality of the neighborhood.

**The priority site is Bacon Felt (395 West Water Street)**, a four-acre parcel of land occupied with a three-story brick mill building. The site is vacant and encompasses an entire block between Fourth and Fifth Streets. It is currently tax-delinquent and under site control by the City. The parcel is located in the FEMA 1% annual chance flood zone<sup>5</sup>. This is the former location of the Bacon Felt manufacturing facility. The Site has had a long history of prior industrial use including felt product production from wool, bronze manufacturing, and stove lining. The Site was developed prior to 1888. With the existing site building being built around 1900. A recent (October 2023) Hazardous Building Material Investigation identified asbestos-containing materials (ACM), lead-based paint (LBP), possible polychlorinated biphenyl (PCB) containing materials, drums and tanks with hazardous waste, and other regulated materials. The ACM include approximately 80,000 square feet of pipe fitting and insulation debris; 4,000 square feet of floor tile, mastic, concrete and wallboard; 535 windows with impacted glazing/caulking materials; 55,000 square feet of roof flashing; 110 linear feet of caulking and mastic, and 500 linear feet of pipe conduit impacted with asbestos. According to the LBP testing, all 18 samples collected had a detectable level of lead, which according to the Occupational Health and Safety Administration (OSHA) Lead in Construction Standard 29 CFR 1926.62 is a potential for exposure if dust is generated from disturbances of surfaces coated with paint containing lead. In addition, electrical ballasts, associated with fluorescent lighting fixtures and several wall-mounted mercury thermostats, storage tanks, drums, fire extinguishers, waste chemicals and air conditioners/refrigerators were observed throughout the site buildings.

## **b. Revitalization of the Target Area**

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

In the City's most recent Master Plan, *Taunton Tomorrow (2018)*, facilitated by the City's Office of Economic and Community Development (OECD), one of the plan's goals is to maintain a diverse stock of affordable housing for individuals and families of varying ages, incomes, and needs including the identified underserved low-income communities in our target area. One of the action items for this goal is to "continue to use the city's brownfields program to promote adaptive reuse of former industrial sites"<sup>6</sup>. The plan also states that "the city has a larger percentage of brownfield/contaminated sites than comparison cities and towns, and a lower share of greenfield sites suitable for development". The Master Plan notes that since many of Taunton's brownfield sites are in older neighborhoods, they would make great candidates for conversion to affordable residential housing or mixed-use because of their "walkable village character".

The Weir Village is the prime example of impacted Brownfields land that is impeding economic redevelopment thus remediation is pertinent. The City is looking to have a site reuse market study for revitalization of the Weir Village to help ensure the development avenues, such as

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<sup>5</sup> FEMA Flood Map Service Center: Search by Address. <https://msc.fema.gov/portal/search#searchresultsanchor>

<sup>6</sup> *Taunton Tomorrow*: City of Taunton Comprehensive Master Plan, 2019-2040, page 84. [https://www.taunton-ma.gov/sites/tauntonma/files/uploads/taunton\\_comprehensive\\_master\\_plan\\_-\\_optimized.pdf](https://www.taunton-ma.gov/sites/tauntonma/files/uploads/taunton_comprehensive_master_plan_-_optimized.pdf)

affordable housing and commercial redevelopment that create good paying jobs are the most successful for the identified underserved populations. There is currently a high need for affordable housing, phasing out industrial use of these parcels could help pave the way to private development. The Bacon Felt site has been identified as high-priority target site because of its promising reuse potential as private developments in the Weir's walkable village neighborhood. The priority site is industrial-zoned and, could be on a path to remediation, reuse, and returned to the tax rolls. With the assistance of clean-up funding could turn a blighted former mill into a vibrant, productive, attractive, and revenue-producing mixed-use complex.

ii. Outcomes and Benefits of Reuse Strategy

First and foremost, the remediation of the priority site Bacon Felt will eliminate public access to hazardous materials, asbestos, and lead paint, and address heavy metals and volatile organic compounds in soils and groundwater, mitigating pollution to the Taunton and Mill Rivers. This cleanup will allow the City to identify and eliminate (I&I) sources into the municipal sewer system in accordance with 314 CMR 12.04(2), the state law governing wastewater treatment and discharge standards.

Activities for cleanup on the priority site can begin immediately, following the proper permitting. There is no foreseen displacement of residents or businesses in the remediation and redevelopment activities. The Office of Economic and Community Development, will work with any neighboring business to mitigate challenges associated with clean-up. The immediate benefit of a City-owned brownfield site cleanup is the subsequent sale and reuse of the property to the private sector. Not only does this remove the burden of maintenance from the City but also generates new tax revenue since the properties will be in private hands. The target area is currently an eye sore for the city, dilapidated buildings in an aged industrial district, in desperate need of attention and redevelopment to promote health and safety, while providing a sustainable neighborhood.

In the long term, the potential reuse or rezoning of Bacon Felt for housing will make great strides in addressing the current shortage of affordable and market-rate rental housing in the region. The Master Plan notes that Taunton's zoning codes in the last half century have discouraged the development of all housing types other than single family detached and that this has led to suburban sprawl and a shortage of quality rental housing in older, more walkable neighborhoods. Today, however, that trend is reversing and many young adults and senior citizens are actively seeking residence in a walkable, urban settings. Fortunately, Taunton has the bones to accommodate this demand and is working to make adjustments so that the redevelopment of sites in the Weir Village like Bacon Felt can capitalize on this emerging market.

To encourage this development, a 2013 city zoning ordinance change created incentives for the redevelopment of old mill buildings by offering a 15% density bonus for developments "on a brownfield site and/or the renovation and reuse of a building more than 50 years old"<sup>7</sup>. Rehabilitated or newly constructed properties including the priority site will also be required to implement climate resilient building and redevelopment techniques particularly along the watershed of the Taunton River, which is susceptible to flooding from increased weather events. Redevelopment of the priority site will also be required to meet the MA Energy Code and will be

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<sup>7</sup> City of Taunton Zoning Ordinance, Section 10.4.6: Development Density.

encouraged to meet the LEED standards for energy conservation. In 2021, Taunton voted to adopt the state’s Property Assessed Clean Energy Program, which allows property owners to finance solar and energy efficiency investments to existing commercial, industrial and multifamily buildings over twenty years through a betterment on their tax bill. This is a valuable tool available to developers and property owners in Taunton looking to make cleaner energy investments in their buildings and help combat impacts from climate change.

**c. Strategy for Leveraging Resources**

i-iii. Resources Needed for Site Reuse

The City is currently engaged in Mass-Development’s Brownfields Program, where we are currently **remediating** another site for redevelopment into much needed housing units. Within the program, the City is eligible for \$250,000 of **assessment** funding and \$500,000 in **clean-up**. Mass-Development funding could also be utilized as gap funding for additional assessment and cleanup of the target area. In addition, the city has a Housing Development Incentive Program zone which allows new market-rate housing developments in that zone to petition the City Council for a reduced tax rate on incremental increased value. An incentive used by the City in recent years for the **reuse** of industrial development is Tax Increment Financing (TIF), where a developer petitions the City Council for a reduced tax rate for a fixed term of years on the increase in taxable value from their project.

The City needs this unsecured Brownfields clean up funding to first protect the health and wellbeing of its residents, and secondly help secure commitments with private developers and to realize the full value/success of these supplemental funding resources. We will also continue to seek other funds, such as HUD, EDA, CDBG, historic tax credits and we will advocate for potential funding for developers/owners through federal, state, and local grants/loans.

iv. Use of Existing Infrastructure

Existing city infrastructure including public water, sewer, electricity and high-speed internet has the capacity to serve and is already available at Bacon Felt and is sufficient to support the reuse of the priority site. The increased usage that will result from the reuse of these sites will add more water and sewer ratepayers to the system as well as additional tax revenue for better upkeep of the existing infrastructure and roads that already provide access to the priority site.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

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

Compared to the state average, Taunton residents face a higher rate of poverty (13.5% v 10.4%) and have a lower median household income (\$66,787 v \$89,026).<sup>8</sup> This economic disadvantage associated with low-income communities can result in “higher levels of violence, discrimination, and material deprivation—including the lack of housing, heat, water, and electricity. These communities have more environmental pollutants, under resourced schools, and higher rates of unemployment and incarceration.”<sup>9</sup> The Bureau of Labor Statistics estimated in August 2023

<sup>8</sup> <https://www.census.gov/quickfacts/fact/table/MA,tauntoncitymassachusetts/HSG650221#HSG650221>

<sup>9</sup> <https://www.healthaffairs.org/doi/10.1377/hpb20180817.901935/#:~:text=The%20communities%20in%20which%20low,rates%20of%20unemployment%20and%20incarceration.>

that the unemployment rate in the Taunton-Middleboro-Norton area were in fact higher than the state (3.2% v 2.6%).<sup>10</sup>

If challenges of unemployment were not enough to impede income, Taunton is further restricted in its revenue-generating capacity by Proposition 2 ½, a Massachusetts statute which limits a municipality's ability to increase property taxes. The name of the law refers to the maximum 2.5% annual limit on the increase of both the levy limit and ceiling that the municipality is permitted. Most of the city's infrastructure and public buildings were constructed at a time before modern environmental protection and human accessibility laws were in place, rendering many of its facilities out of compliance with today's standards. The Americans with Disabilities Act (ADA) mandates that public facilities be accessible to people of all abilities. The city has spent millions of dollars of its allotment of transportation funds from the state towards making repairs to all of its buildings, schools, and public properties to make them ADA-accessible. These mandatory expenses have detracted from the city's available road and sidewalk maintenance funds.

Since 2003, the City has completed at least one major (I&I)<sup>11</sup> reduction contract annually totaling over \$55M spent on I&I removal since that time. The City is currently under an administrative consent order from MA DEP and an order of compliance from US EPA, both of which mandate the City to reduce I&I in the municipal sewer system. It costs the City over \$500K per year to pump and treat I&I products, leaving little budgetary space for additional brownfield remediation.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Using the EJSCREEN tool and examining a one-mile radius of The Bacon Felt property, the area exceeds the state average in 7 out of 8 socioeconomic indicators. The number of children under age five in the area ranks in the 79<sup>th</sup> percentile of Massachusetts and the 74<sup>th</sup> percentile nationally. Another particularly high indicator is limited English speaking households, which ranks in the 83<sup>rd</sup> percentile in the US. The number of adults in the study area with less than a high school education as well as those unemployed are both overrepresented compared to state and national level. In addition to socioeconomic barriers, the target area contains 15 water dischargers, 17 air pollutants, 3 brownfields and 4 toxic release inventories that are report to EPA. Remediation of the priority site will protect nearby water ways (natural resources) and mitigate human exposure, particularly vulnerable children, to identified COCs.

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

The City of Taunton is designated as one of the higher risk communities by the Massachusetts Department of Public Health's Childhood Lead Paint Poisoning Prevention Program. Of the 23,844 housing units in Taunton, 16,367 (71.5%) were built prior to the ban of lead paint (Census 2010). As a result, the state rate of elevated blood lead levels for children between 6 months and 5 years of age is 0.3, while the Taunton area rate is 0.4. The actual rate of lead

<sup>10</sup> [https://www.bls.gov/eag/eag.ma\\_taunton\\_nd.htm](https://www.bls.gov/eag/eag.ma_taunton_nd.htm)

<sup>11</sup> Infiltration and Inflow is extraneous water (groundwater, rainwater, etc.) which enters a sewer system. Infiltration is typically groundwater that enters the system through defective pipes, pipe joints, service connections, and manhole defects. Inflow is rainwater entering a system through direct connections such as catch basins, roof leaders, cellar and yard drains, and foundation drains.

poisoning cases for the same age group for the state is 0.3, while the Taunton area is almost three times higher at 0.8.<sup>12</sup>

According to the Morton Hospital Community Health Needs Assessment (CHNA) of 2021, lung cancer death was the highest level of mortalities compared to other types of cancer. Massachusetts Department of Health reports indicate that between the years of 2008 and 2015, the City of Taunton has seen a significant increase in the expected and observed incidences of cancer. In particular, Thyroid cancer, melanoma and lung and bronchus cancers.<sup>13i</sup> Asbestos (a priority site COC) and cancer have been linked<sup>14</sup>. Further air pollutants from such COC's could be linked to other air-related health concerns. A Massachusetts Department of Public Health report states that as of December 2018, Taunton has an asthma emergency department visit rate of 97.2 for every 10,000 people, in comparison to the state average of 70.9. The prevalence of pediatric asthma in Taunton is 14.2%, above the state's 12.1%.<sup>15</sup>

### *(3) Environmental Justice*

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

The priority site is located in an EJ area based on income and the number of households that are of racial, ethnic or linguistic minority. This means that at least 25% of households in that tract earn 65% or less than the state median income and that 20% or more of households speak a language other than English. The residents of the Weir target area face disproportionate environmental pollution issues. According to EJSCREEN, 11 out of 12 EJ indices exceed the state average and 8 exceed the national average, with air quality indicators being particularly high.

Cleaning the priority site would make environmental conditions safer for residents who live nearby, as they may be currently exposed to contaminants in their soils, air, and groundwater. The site is located in 1% annual chance flood zones. Flood events, which are becoming increasingly more common due to climate change, heighten the risk of contaminants being released from this site into the Department of Interior's designated as a Wild and Scenic Taunton River and Cobb Brook; this risk would ultimately be eliminated following the proper cleanup of this site.

#### *(b) Advancing Environmental Justice*

Clean up of the priority site would provide residents with a safer environment to live, work and play. Individuals living in the Weir target area are already at a disadvantage due to poor diet, lack of access to services such as health care, transportation, and opportunities for exercise via green spaces. By remediating the Weir Village, the city can help address the welfare of its residents.

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<sup>12</sup> Massachusetts Department of Public Health, Massachusetts Community Health Information Profile (MassCHIP), Kids Count Profile, June 4, 2013.

<sup>13</sup> <https://www.mass.gov/lists/cancer-incidence-city-town-supplement>

<sup>14</sup> <https://www.cancer.gov/about-cancer/causes-prevention/risk/substances/asbestos/asbestos-fact-sheet>

<sup>15</sup> Massachusetts Department of Public Health: Environmental Health Tracking. Community Profile for Taunton. Report created December 4, 2018. <http://www.mass.gov/dph/mattracking>



## **b. Community Engagement**

### **i. and ii. Project Involvement and Roles**

- *The Taunton Diversity Network*, spearheaded by April Funches ([tauntondiversitynetwork@gmail.com](mailto:tauntondiversitynetwork@gmail.com), 774-218-4657) will provide outreach to diverse and disproportionately impacted populations.
- *Taunton Redevelopment Authority*, spearheaded by OECD's Executive Director will help with for receiving, redeveloping, and selling real estate on behalf of City.
- *Taunton Housing Authority's* Residence Services Department (508-824-0315) Provide outreach to residents in public housing.
- *Taunton River Watershed Alliance* overseen by Joe Callahan, [trwa\\_staff@verizon.net](mailto:trwa_staff@verizon.net), 508-828-1101 Provide biological and environmental consultation regarding the rivers adjacent to both target sites.
- *Barrett Planning Group LLC* Judi Barrett, [judi@barrettplanningllc.com](mailto:judi@barrettplanningllc.com) (781) 934-0073 ext. 07 Ms. Barrett is currently contracted with the city for a housing production plan, we will consult for possible reuse of parcels for housing development

### **iii. Incorporating Community Input**

Upon notice of award, a core team will be convened which will include OECD staff, the City Planner, a City Building official and representatives from the aforementioned partner entities. The core team will immediately look to plan and schedule a public meeting with a Zoom attendance option to present the grant guidelines and solicit feedback on priority brownfield site. In addition, the City will offer a brief online survey to local residents that will request feedback on the priority site and gain an understanding of what members of the immediate neighborhood would like to see. The meeting and survey option will be advertised by way of circulars posted at local shops and community centers, social media outlets, the City website, and formal notifications in the local newspaper. Notifications will be translated into Spanish and Portuguese and translators will be available at the meeting. Translated paper copies will be available through community partners such as the Taunton Housing Authority and the Taunton Diversity Network.

As key milestones are reached, these items will be updated on the City website and various community partners will post updates to their social media outlets. The OECD will further serve as the primary repository for all program documents.

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

### **a. Proposed Cleanup Plan**

The cleanup plan for the priority site is full abatement (removal) of widespread hazardous building materials (ACM, LBP, and PCBs) with off-site disposal and building demolition. Since the current site buildings are in imminent danger of collapsing the abatement and demolition would allow safe access to the priority site for the public and for additional assessment of the soil and groundwater. This cleanup plan is practical, implementable, and a cost-effective way to protect human health and the environment. It is also an effective way to prevent future receptors and site occupants (including residential use) from coming into direct contact with hazardous building materials.

The cleanup would include the following:

**ACM** - 80,000 square feet of pipe fitting and insulation debris; 4,000 square feet of floor tile, mastic, concrete and wallboard; 535 windows with impacted glazing/caulking materials; 55,000 square feet of roof flashing; 110 linear feet of caulking and mastic, and 500 linear feet of pipe conduit impacted with asbestos.

**LBP** - All 18 samples collected had a detectable level of lead, which according to the Occupational Health and Safety Administration (OSHA) Lead in Construction Standard 29 CFR 1926.62 is a potential for exposure if dust is generated from disturbances of surfaces coated with paint containing lead. All painted surfaces are estimated to contain LBP.

**PCBs** – As part of the hazardous building material survey materials containing suspect PCB. 535 windows with impacted glazing/caulking materials were assumed to contain PCBs.

**Waste Drums & Tanks** – Seven unmarked drums and two unmarked tanks were assessed for disposal during site assessment. The drums contain various chemicals and materials which require special handling and disposal. Drums contents include alkaline and acidic solutions (pH range 3.82 to 13.51), VOCs, SVOCs, petroleum and metals in solid waste The tanks contain (H) alkaline solids with petroleum and metals, and (v) solids with elevated petroleum and metals.

Cleanup activities would include hiring a QEP and licensed abatement and demolition contractors. The abatement contractor would prepare a non-traditional asbestos abatement work plan (NTWP) for approval by the City, QEP, and MassDEP, the abatement and demolition contractor will create an abatement/demolition plan for approval by the City, QEP, and EPA; all hazardous and regulated materials will be disposed of off-site at licensed receiving facilities; conduct abatement and demolition with QEP oversight, prepare closeout documents for the cleanup activities.

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

<b>Task I: Cooperative Agreement Oversight</b>
i. Project Implementation: Core project team will be established; Formal site access agreements will be prepared by the City Attorney. Community Input. Hire LSP/QEP. ACRES & MBE/WBE reporting. City personnel 320 hours at \$125/hour = \$40,000; QEP will assist with quarterly MBE/WBE reporting, QEP ACRES quarterly reporting 6 quarters x \$650 = \$ 3,900 <b>Total: \$43,900</b>
ii. Anticipated Project Schedule: <6 months
iii. Task/Activity Lead: Executive Director, OECD/ QEP
iv. Outputs: Authorization of EPA/Municipal cooperative agreements; procurement of LSP/QEP; preparation of quarterly reports.
<b>Task II: Community Outreach &amp; Engagement</b>
i. Project Implementation: ABCA and CIP preparation and 2 public meetings. OECD staff 290 hours at \$125/hour = \$36,250; \$900 x 2 public meetings= \$1,800 and ABCA & CIP = \$4,000 <b>Total: \$42,050</b>
ii. Anticipated Project Schedule: <6 months
iii. Task/Activity Lead: City of Taunton OECD, Procurement,
iv. Outputs: ABCA & CIP reports, 2 Public meetings
<b>Task III: Site-Specific Activities</b>
i. Project Implementation: OECD conduct procurement process for LSP/QEP/Abatement/Demo contractors; MassDEP Cleanup/Abatement plan preparations; cleanup/abatement activities MCP Cleanup Plan = \$4,750; ACM, LBP, & PCB abatement and demo \$799,250 <b>Total: \$ 804,000</b>

ii. Anticipated Project Schedule: < period to begin after completion of tasks I and II.
iii. Task/Activity Lead: Project Manager, OECD
iv. Outputs: MassDEP Cleanup/Abatement plans, Completed Cleanup of Priority Site
<b>Task IV: Oversee Site Cleanup</b>
i. Project Implementation: QEP Oversight and MCP Site closure OECD staff 90 hours at \$125/hour = \$1,211,250, QEP Oversight = \$90,000, QEP Closure reporting = \$9,800 <b>Total: \$111,050</b>
ii. Anticipated Project Schedule: Throughout the grant performance period.
iii. Task/Activity Lead: Executive Director, OECD/ QEP
iv. Outputs: Closure reports

**c. Cost Estimates**

<i>Budget Categories</i>	<i>Cooperative Agreement Oversight Task I</i>	<i>Community Outreach and Engagement Task II</i>	<i>Site Specific Activities Task III</i>	<i>Oversee Cleanup Task IV</i>	<i>Total</i>
<i>Personnel</i>	\$ 40,000	\$ 36,250	\$ 0	\$ 11,250	\$ 87,500
<i>Contractual</i>	\$ 3,900	\$ 4,800	\$ 4,750	\$ 99,800	\$ 113,250
<i>Construction</i>	\$ 0	\$ 0	\$ 799,250	\$ 0	\$ 799,250
<i>Total</i>	\$ 43,900	\$ 41,050	\$ 804,000	\$ 111,050	\$ 1,000,000

Note: A breakdown of costs is presented in the task descriptions under 3.a. above.

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

Our anticipated outputs will be technical and quantitative reports that will provide the City with certification that the priority site is remediated. Outcomes will include developer purchase of the priority site for reuse. All data shall be entered into the ACRES reporting database as quarterly reports. The City will track the outcomes of these projects beyond the limits of the EPA clean up grant by measuring and documenting increases in tax revenue, housing units, jobs created, and the development of open space. Additionally, progress will be measured and tracked through the approved work plan to ensure milestones are met.

**4. PROGRAMMATIC CAPACITY AND PAST PERFORMANCE**

a. Programmatic Capability

i.-iii. Organization Capacity, Structure, and Key Staff

This grant will be managed through the City’s Office of Economic and Community Development. The current staff of five full-time employees have managed EPA Assessment and RLF grants for the City for over twenty years and multiple grant awards. Staff roles include Executive Director Jay Pateakos, Assistant Director Jim Howland, Grants Manager Heather Rios, Fiscal Manager Radka Barter, and Principal Clerk Tori Carter. This municipal department administers \$1.5 million annually in HUD block grants as well as many state and federal competitive grants. The Executive Director will convene and drive the core team, the Assistant Director will oversee the clean-up of Bacon Felt, the Grants Coordinator will file quarterly reports and the Fiscal Manager will perform the fund drawdowns. All staff work in the same office suite and maintain a team environment through daily communication, planning, and visioning.

iv. Acquiring Additional Resources

The City of Taunton has a dedicated Procurement Department that handles all bids and purchasing for the entire organization. This Department has standard operating procedures that conform to federal, state, and all applicable procurement laws and regulations. If additional resources are required, OECD staff will work closely with Procurement to obtain what is needed in an efficient and compliant manner. The City will follow a competitive procurement process to select a QEP to assist with the cleanup.

**b. Past Performance and Accomplishments**

**i. Currently Has or Previously Received an EPA Brownfields Grant**

(1) Accomplishments

Using federal EPA grants, as well as HUD funding, state grants and municipal resources, the City of Taunton and its community partners have successfully completed site assessments of nine properties covering 30.32 acres. The City has assisted with a number of assessment and clean-up actions. Five (5) properties totaling 15.13-acres were completed through our RLF/Sub-grant program. The outputs/outcomes are accurately reflected in ACRES.

Examples of major clean-up projects include:

Nu-Brite Paint and Chemical Plant – City provided assessment and RLF sub-grant funding to our non-profit community partner The Neighborhood Corp to perform the assessment and remediation of the 2.7-acre site, resulting in the construction of eight affordable housing units.

Robertson on the River Mill – The City provided assessment and RLF sub-grant funding to the non-profit Neighborhood Corporation to clean and redevelop the 6.6-acre former Robertson Curtain Factory site, resulting in the development of 64 affordable residential units and 18,000 square feet of commercial space for small businesses.

F.B. Rogers Silver Mill – The City, using EPA Assessment, RLF loan funding and other state and municipal funding sources performed the demolition and cleanup of the 2.26-acre site along the Wild and Scenic Taunton River resulting in the development of the Weir Village Riverfront Park.

(2) Compliance with Grants Requirement

Taunton has been in full compliance with current and past work plans, quarterly reports, financial status reports, and property profile forms to our EPA Project Manager and completed Assessment, Cleanup and Redevelopment Exchange System (ACRES) and, the Automated Standard Application for Payments (ASAP) system reports on a timely basis. Our previous compliance with four Revolving Loan Fund awards (*BF 97180001*: totaling \$2,300,000) and one Assessment for Hazardous Substances award (*BF 00A00083*: \$200,000) can showcase Taunton's ability to successfully implement and close an award in line with standards set by the EPA and other stakeholders.

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# **ATTACHMENT A**

## **Threshold Criteria for Cleanup Grants**

**City of Taunton, MA**

**Bacon Felt Site, Taunton, MA**

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

## Attachment A - Threshold Criteria for Cleanup Grants – City of Taunton, MA

### 1. Applicant Eligibility

The City of Taunton, Massachusetts (City) affirms that it is a municipality (General Purpose Unit of Local Government) eligible to apply for Brownfields Cleanup funding from the U.S. Environmental Protection Agency (EPA) Brownfields Grant Program.

### 2. Previously Awarded Cleanup Grants

The City of Taunton affirms that the Bacon Felt property in Taunton, Massachusetts has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

### 3. Expenditure of Existing Multipurpose Grant Funds

The City of Taunton affirms that it does not have an open EPA Brownfields Multipurpose Grant.

### 4. Site Ownership

The City of Taunton affirms that it is the sole owner of the site under fee simple title.

### 5. Basic Site Information

a) *Site Name:* Bacon Felt

b) *Site Address:* 395 West Water Street, Taunton, Massachusetts 02780

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

a) *Type of Contamination:* Hazardous Substances.

b) *Operational History and Current Uses:* The Site consists of two parcels (Parcel 1 and Parcel 2) with two buildings. Parcel 1 is approximately 1.00 acres of land and Parcel 2 is approximately 1.83 acres of land for a total of approximately 2.83 acres. Building 1 is located on Parcel 1 and is a four-story brick, masonry, and wooden framed structure and Building 2 is located on Parcel 2 and is a single-story brick, concrete block, and wooden framed structure. The Site has had a long history of prior industrial use including felt product production from wool, bronze manufacturing, and stove lining. The Site was developed prior to 1888. With the existing site building being built around 1900. The Site was in continuous use through 2008, when it became a vacant building and the location of numerous trespassing events. The City of Taunton acquired the property from 395 West Water Street, LLC. on August 3, 2022, due to non-payment of taxes and remains vacant today, awaiting proper cleanup and redevelopment, pending much-needed funding assistance.

c) *Environmental Concerns:* As noted below, multiple investigations have been conducted to characterize the site between 2008 and 2023. Green Seal Environmental, Inc. (GSE), conducted a limited subsurface investigation of soil and groundwater at the Site in 2007. This investigation determined that there were detections of cadmium, lead, zinc, and

## Attachment A - Threshold Criteria for Cleanup Grants – City of Taunton, MA

extractable petroleum hydrocarbon (C11-C22 aromatics), and six polycyclic aromatic hydrocarbons (PAHs) in soil at concentrations above the MCP Method 1 Reportable Concentrations.

A release was reported to Massachusetts Department of Environmental Protection (MassDEP) on May 29, 2008, and assigned a Release Tracking Number (RTN) 4-21242 under the Massachusetts Contingency Plan (MCP). A Phase I Initial Site Investigation and Tier Classification Submittal was submitted to MassDEP on June 2, 2009. The Tier Classification was reestablished on November 7, 2011. In February 2015, a Notice of Noncompliance (NON) was issued to the previous property owner (395 West Water LLC c/o Providence Realty Corp), which indicated that the Subject Property is not in compliance with the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000). MassDEP has no record for the completion of response actions required under the MCP to address the release. Furthermore, no abatement of hazardous building materials or other remedial actions have occurred at the site to date.

A supplemental Phase I ESA was completed on behalf of the City in 2022, and a Hazardous Building Materials Inventory (HBMI) was completed in 2023. The results of the HBMI study identified hazardous building materials including asbestos-containing materials (ACM), lead-based paint (LBP), components potentially containing polychlorinated biphenyls (PCBs) or mercury, and other universal wastes throughout the site buildings.

***Contaminant Sources and Extent:*** Due to the types of building materials used in the original construction and maintenance, repairs, and various renovations over the years by prior owners, hazardous building components have been identified throughout the site building, including asbestos-containing materials (ACM); lead-based paint (LBP); components potentially containing polychlorinated biphenyls (PCBs), such as light ballasts; mercury-containing lamps; fluorescent light bulbs; thermostat switches; and other universal wastes.

Specifically, the October 2023 Hazardous Building Material Investigation identified asbestos-containing materials (ACM), lead-based paint (LBP), possible polychlorinated biphenyl (PCB containing materials, drums with hazardous waste, and other hazardous/regulated materials. These ACM include approximately 80,000 square feet of pipe fitting and insulation debris; 4,000 square feet of floor tile, mastic, concrete and wallboard; 535 windows with impacted glazing/caulking materials; 55,000 square feet of roof flashing; 110 linear feet of caulking and mastic, and 500 linear feet of pipe conduit impacted with asbestos. According to the LBP testing, several all 18 samples collected had a detectable level of lead, which according to the Occupational Health and Safety Administration (OSHA) Lead in Construction Standard 29 CFR 1926.62 is a potential for exposure if dust is generated from disturbances of surfaces coated with paint containing lead.

In addition, electrical ballasts, associated with fluorescent lighting fixtures and several wall-mounted mercury thermostats, storage tanks, drums fire extinguishers waste chemicals and air conditioners/refrigerators were observed throughout the site buildings.

## Attachment A - Threshold Criteria for Cleanup Grants – City of Taunton, MA

In accordance with local, State, and Federal laws and regulations, these hazardous building materials, that will be disturbed or impacted by future building renovation and/or demolition activities, will be properly abated and cleaned up prior to or during future Site redevelopment in accordance with local, State, and Federal regulations. The 2009 Initial Site Investigation Report identified impacted soil, which will likely be addressed through other response actions in accordance with the MCP.

### 7. Brownfield Site Definition

The Bacon Felt site is an eligible site for Brownfields funding. Furthermore, the City of Taunton affirms that the site is:

- a) not listed or proposed for listing on the National Priorities List;
- b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c) not subject to the jurisdiction, custody, or control of the United States government.

### 8. Environmental Assessment Required for Cleanup Grant Proposals

The following environmental assessments have been completed for the site:

- Phase I Initial Site Investigation and Tier Classification, Former Bacon Felt Building, 395 West Water Street, Taunton, Massachusetts, DEP RTN 4-21242, Green Seal Environmental, Inc., May 25, 2009.
- LSP Opinion Relative to Tier Classification, Conceptual Phase II Scope of Work, 395 West Water Street, Taunton, MA. RTN 4-21242, Action Environmental, November 7, 2011.
- Phase I Environmental Site Assessment Report, Former Bacon Felt Company, 395 West Water Street, Taunton, Massachusetts, Weston & Sampson, October 2022.
- Report of Hazardous Building Materials Investigation, Bacon Felt Property, 395 West Water Street, Taunton, Massachusetts, Weston & Sampson, October 13, 2023.

The 2023 Phase I ESA was completed in accordance with ASTM International Designation: E 1527-21, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process*, which meets the requirements of the United States Environmental Protection Agency (USEPA) All Appropriate Inquiry (AAI), 40 CFR Part 312. In addition, the subsequent investigations including Phase I ISI and the HBMI were generally completed in accordance with ASTM International Designation E1903-19 and constitute equivalent Phase II ESAs for investigation of the site, in accordance with the MassDEP and Massachusetts Contingency Plan (MCP) Regulations.

### 9. Site Characterization

- b. A current letter from the MassDEP is attached to this Threshold Criteria (*Attachment B*).



## **Attachment A - Threshold Criteria for Cleanup Grants – City of Taunton, MA**

This letter clearly indicates that the information is for the FY24 Cleanup Grant application and includes the following:

- i.** Affirms that the site is eligible to be enrolled in the state or Tribal voluntary response program (MassDEP MCP);
- ii.** Indicates that the site(s) is enrolled, or intends to be enrolled, in the state or Tribal voluntary response program (MassDEP MCP); and
- iii.** Indicates that there is a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

### **10. Enforcement or Other Actions**

There are no ongoing or anticipated environmental enforcement actions, other actions, orders, or local, state, or federal inquiries for the site. Furthermore, the applicant is not aware of any current records of judgments, liens, or other enforcement actions regarding this site.

### **11. Sites Requiring a Property-Specific Determination**

The applicant affirms that a property-specific eligibility determination is not required.

### **12. Threshold Criteria Related to CERCLA/Petroleum Liability**

#### **a. Property Ownership Eligibility – Hazardous Substance Sites**

##### **i. EXEMPTIONS TO CERCLA LIABILITY**

#### **(3) Property Acquired Under Certain Circumstances by Units of State and Local Government**

- (a)** The City of Taunton acquired the Bacon Felt site through Tax Delinquency.
- (b)** August 3, 2022
- (c)** The City of Taunton affirms that all disposal of hazardous substances at the site occurred before the City acquired the property through Tax Lien.
- (d)** The City of Taunton affirms that it did not cause or contribute to any release of hazardous substances at the site.
- (e)** The City of Taunton affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

### **13. Cleanup Authority and Oversight Structure**

- a. *Cleanup Oversight Plan:*** The City of Taunton will ensure that the cleanup of hazardous substances at the site will comply with applicable local, state, and federal laws and regulations, and that the cleanup actions will be protective of human health and the environment. The City will competitively bid and retain a qualified environmental

## Attachment A - Threshold Criteria for Cleanup Grants – City of Taunton, MA

professional (QEP) and a Massachusetts Licensed Site Professional (LSP), in accordance with competitive Federal procurement provisions. Our procurement process will be conducted in accordance with 2 CFR Part 200, 2 CFR Part 1500, 40 CFR Part 33, and as provided in EPA guidance and other applicable state and federal laws. The QEP/LSP will work with City to design, prepare specifications and bidding documents, and oversee and document remediation activities at the site, as well as to assist with the interface between the target community, MassDEP, and EPA. The QEP/LSP will also assist with the competitive bid process for selecting an environmental cleanup contractor to perform the proposed cleanup actions. The City will contract with the selected QEP/LSP and environmental cleanup contractor(s) prior to initiating cleanup activities. The site has also been enrolled/registered with the MassDEP under the MCP.

- b. *Access Plan for Adjacent or Neighboring Properties:*** The City views the adjacent property owners as project stakeholders and cooperative partners in the proposed cleanup actions at the site. The City will be in frequent communication with these property owners prior to and during cleanup activities. At this time, the proposed cleanup activities are limited to the site and are not anticipated to extend to adjacent properties. However, if the proposed cleanup or confirmatory sampling/monitoring requires access to the adjacent properties, a formal written access agreement will be obtained from the adjoining property owners, if necessary. Furthermore, the City and the MassDEP have the regulatory authority to access adjacent properties for emergency situations.

### **14. Community Notification**

The City of Taunton has fulfilled the community notification requirements for the site.

- a. *Draft Analysis of Brownfields Cleanup Alternatives:*** An Analysis of Brownfields Cleanup Alternatives - Preliminary Evaluation (which includes a description of the site, contamination, and cleanup standards/laws; a description of cleanup alternatives evaluated; and a description of the proposed cleanup) was prepared prior to the public notice and public meeting. The draft ABCA and draft grant proposal were made available for public review at City Hall offices during regular business hours.
- b. *Community Notification Ad:*** The City published a community notification ad on October 26, 2023 (at least 14 days prior to submittal of the grant application to EPA, per grant guidelines) in the *Taunton Daily Gazette*, a local daily newspaper. This advertisement stated that a copy of the draft ABCA and draft grant application were available for public review and comment; provided instructions for commenting on these draft documents; identified the location where the draft documents were located for review; and presented the date and time of the public meeting.
- c. *Public Meeting:*** The City subsequently held a public meeting at 6:00 p.m. on Monday, October 30, 2023. The public meeting was held in-person at Taunton City Hall. The purpose of the meeting was to discuss the draft grant application, draft ABCA, and consider and responds to public comments prior to submittal of this grant proposal.

## Attachment A - Threshold Criteria for Cleanup Grants – City of Taunton, MA

d. *Submission of Community Notification Documents:* The following items are included in *Attachment C:*

- 1) A copy of the draft ABCA-Preliminary Evaluation;
- 2) A copy of the newspaper advertisement demonstrating notification to the public and solicitation for comments on the proposal;
- 3) A summary of the public meeting minutes with any questions/comments received, responses to the questions/comments, and applicable meeting notes from the public meeting; and
- 4) A list of attendees from the public meeting (sign-in sheet).

### 15. Contractors and Named Subrecipients

- **Contractors:** Not Applicable
- **Named Subrecipients:** Not Applicable

# **ATTACHMENT B**

**Acknowledgment Letter from MassDEP**

**City of Taunton, MA**

**Bacon Felt Site, Taunton, MA**

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



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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

Maura T. Healey  
Governor

Kimberley Driscoll  
Lieutenant Governor

Rebecca L. Tepper  
Secretary

Bonnie Heiple  
Commissioner

November 3, 2023

*Via Email*

Heather Rios, Grant Manager  
Office of Economic and Community Development  
City of Taunton  
15 Summer Street  
Taunton, MA 02780

**RE: STATE LETTER OF ACKNOWLEDGMENT**  
City of Taunton – Brownfields Cleanup Grant  
395 West Water Street, Taunton [RTN 4-21242]

Dear Ms. Rios:

I am writing to support the application submitted by the City of Taunton under the Fiscal Year 2024 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. We understand that the City of Taunton is proposing to undertake cleanup activities including the abatement of hazardous building materials and remediation of contaminated soil.

Based on information provided by the City of Taunton, the City took ownership of the property through tax taking 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 Taunton 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  
Jim Howland, Assistant Director – Taunton OECD  
Angela Gallagher, MassDEP Southeast Regional Office  
Kathryn Carvalho, MassDEP Southeast Regional Office

This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.  
TTY# MassRelay Service 1-800-439-2370  
MassDEP Website: [www.mass.gov/dep](http://www.mass.gov/dep)

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