



1. Applicant Identification: The Caleb Foundation, 270 Broadway, Lynn, Massachusetts 01904
2. Funding Requested:
 - a. Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$500,000
3. Location: Oxford, Oxford County, Maine
4. Property Information: Robinson Manufacturing Mill, 283 King Street, Oxford, Maine 04270
5. Contacts:
 - a. Project Director: Suzanne Decavèle, Director of Acquisitions, 270 Broadway, Lynn, Massachusetts 01904; Telephone: (781)595-4665 ext 106; and email: sdecavele@thecalebgroup.org
 - b. Chief Executive: Debbie Sawyer Nutter, President & CEO/Co-Founder, The Caleb Group, 270 Broadway, Lynn, Massachusetts 01904; Telephone: (781) 595-4665 ex 100; and email: dnutter@thecalebgroup.org
6. Population:
 - a. Population of the Town of Oxford according to the 2020 American Community Survey (ACS) via Census.gov: 4,229
7. Other Factors:

Other Factors	Page #
Community population is 10,000 or less	1
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the 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 & 3
The proposed site is in a federally designated flood plain.	3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.	2 & 3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation and/or mitigation capacity and resilience to protect residents and community investment.	2 & 4
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.	N/A

8. Releasing Copies of Application: N/A; No confidential, privileged, or sensitive information included.



1.0 PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

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

The Caleb Group/The Caleb Foundation (TCF) is a regional nonprofit affordable housing organization founded in 1992. The founders believe that everyone, including residents of affordable housing, need resources and support beyond stable housing to thrive. TCF believes a clean, safe living environment is integral to a stable life and that by working with residents through our resident service coordinator program, a community of people can be fostered in which housing is a positive, supportive factor in helping people stabilize and thrive. Our first property was acquired and opened in 1994. Since that time, we have steadily grown to include 36 properties home to approximately 4,900 people.

The target area for the proposed grant activities is Oxford Village located at the outlet of Thompson Lake along the Little Androscoggin River, which has a long industrial history. This portion of the Town of Oxford was developed in the early 1800s and was known as Craigie Mill where a sawmill, gristmill, woolen mill and other trades were established. Oxford Village, once the thriving industrial center of town, has suffered from lack of investment since the final closure of the anchor Robinson Manufacturing Mill in 2003. The mill represented a large area of the Village and is an environmental challenge to redevelop. As a result, this Brownfield has inhibited investment in the remainder of the village.

The Town of Oxford's economic center is now located along the bustling Route 26 where sprawling commercial development has taken over and left the Village center disconnected from the majority of activity, furthering the disparity. Properties like Robinson Mill deter migration to the area as the Brownfield is an example of the lack of investment. The surge in housing stock nearly 40 years ago combined with the low income statistic suggests the housing in Oxford to be dated. Housing costs related to income are only within the 46th percentile, indicating relatively low value housing. There is no investment in the target area residences due to the proximity to Robinson Mill as the investment value is diminished by the Brownfield. With saturated housing and skyrocketing costs in the nearby Portland, Lewiston/Auburn, and suburbs, towns like Oxford have huge potential to absorb populations displaced and outpriced from nearby Cities.

This grant will eliminate potential risks to human health and the environment and clear the way for redevelopment of a major brownfield site within the target area. The redevelopment will contribute to revitalization of this blighted Village, add 70+ new residents to the village and will reopen the bridge connection between the east and west sides of the village to improve community walkability. The final redevelopment will provide much needed housing that is new and desirable for existing local and incoming population.

1.a.ii. Description of the Proposed Brownfields Site

The Robinson Manufacturing Mill makes up a 5-acre central portion of Oxford Village and includes title to the land adjoining the bridge that formerly connected the east and west sides of the village. The mill complex is a prime example of a blighted property in the central portion of a small, rural residential community. Robinson Manufacturing began operation in the 19th century and became well known for developing a fade-resistant shade of blue wool known as Oxford Blue, which was used during the Civil War to produce uniforms for the Union Army. Between 1960 and 1993, the mill saw major expansion, including construction of a building that cut off access to the bridge. However, Robinson Manufacturing closed its doors in 2003 and the building has remained vacant and in a state of increasing deterioration since. Conditions during pre-acquisition property



due diligence indicate occasional trespassing, which represents a physical public safety hazard and health hazard due to the residual presence of acids, volatile vapor phase chemicals, deteriorating asbestos, flaking lead paint, and PCB-containing building materials. Recent environmental assessment of the property indicated the presence of polycyclic aromatic hydrocarbons (PAHs), arsenic, lead, chromium, with comingled areas of petroleum in soil throughout the property, evidence of the release of acids associated with historical dye processes, vapor intrusion exposure concerns, and hazardous building materials that are currently compromised by the degraded state of the building. Further, the unmaintained and degrading state represents an environmental hazard due to the runoff proximity to the adjoining river/lake and potential for vandalism and further release of hazardous materials from the building. Since 2003, several attempts to redevelop the mill have been unsuccessful but the Town has incentivized the redevelopment in an effort to remove this Brownfield and revitalize Oxford Village.

1.b. Revitalization of the Target Area

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

The State of Maine is experiencing a housing crisis. It has the oldest population in the nation with a median age of 44.8 years. The senior population will rise by more than a third by 2030 to just shy of 400,000 people, according to projections from the state economist. The redevelopment of the Robinson Mill would address those needs locally by adding 77 rental units of affordable housing for older adults (62+). The adaptive reuse of the building and the addition of housing for older adults is in line with the Town of Oxford's Comprehensive Plan of 2007, which includes the Demographics goal to encourage and promote affordable, decent housing opportunities and the long-term housing goal to meet the housing needs of Oxford residents, including safety and affordability, while recognizing the importance of natural resources and preserving the rural character of the community. This will be achieved by maintaining, upgrading and expanding the traditional village area, in which the Robinson Mill is located. To that effect, as part of the implementation strategies, the Zoning Ordinance was reviewed and amended to create the Mill Redevelopment district.

The proposed redevelopment is meeting the Town's Comprehensive Plan Historic Preservation goal to maintain its historic and cultural heritage by encouraging the maintenance of its historic building and sites; and maintaining and enhancing the traditional village areas. The Robinson Mill buildings date back to the 1890's. The planned adaptive reuse of the Mill buildings and the boiler house with Historic Tax Credits will restore the use of these current vacant structures.

Lastly, the development meets the Town's Comprehensive Plan Natural Resources long term goals to maintain the high quality of its natural resources, or to improve the quality if it has been diminished. The Town's surface water policies place a high priority on maintaining the significant natural resource values of Thompson Lake and its adjacent shorelines, and participating in a joint effort with affected municipalities to maintain the lake level. We started conversations with the Town to discuss the creation of a TIF district, which would benefit the Town by providing additional funding resources needed to maintain the dam located next to the Mill. Dam maintenance contributes to climate resiliency efforts not just for the new development but for all of Thompson Lake. Land Use long term goals include directing new development and land use change in such a way that community characteristics are maintained, public facilities are used efficiently, development sprawl is prevented, and unreasonable demands are not placed upon the community as the result of that development. The Town's policies to support that goal include encouraging new residential development to locate in those areas where municipal services can be the most efficiently



provided; assuring that new residential development is located on or served by roads that have the capacity to handle the cumulative traffic caused by such development; requiring new residential development, which locates along existing public roads, to maximize shared access points; and encouraging new residential development to occur in areas of Town where existing residential development is already concentrated.

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

The successful cleanup of the mill will make way for the construction of 77 rental units of affordable housing for older adults (62+) revitalizing the Village and reconnecting two parts of town currently blocked by one of the warehouses. The cleanup will help decrease the fear of contamination along the Thompson Lake and ensure the safety of the water system in town, as well as provide a healthy neighborhood in which to live and walk. The majority of the warehouses will be demolished to make room for greenspace. Cleanup will help to prevent leaching of contaminants to the groundwater, and most importantly for this site, to prevent disturbance and erosion of contaminated soil to Thompson Lake both now and in a future changing climate. With a portion of the project located in the flood plain, this stabilization will benefit the longevity of this integral area on Thompson Lake adjacent to the dam.

The development will leverage a portion of some of the warehouse additions (6, 10 and a portion of 5) and adaptively reuse the two historic mill buildings and boiler house. The Town of Oxford and Maine’s Department of Economic and Community Development are motivated to see this site redeveloped as it has sat vacant for years. As stated in the previous section, the Town and the State would greatly benefit from added housing units in this time of housing crisis. The proposed housing project will be all electric using heat pumps for heating, cooling and hot water. The redevelopment will be carbon-neutral with all building systems solely running off electricity with the help of roof mounted solar. The buildings will also benefit from a tight envelope. We plan on installing energy STAR appliances and heat vents as well as low flow devices.

1.c. Strategy for Leveraging Resources

1.c.i, ii, iii. Resources Needed for Site Characterization Remediation, and Reuse

Name of Resource	For	Secured/Unsecured?	Details/Information
None needed	Assessment	NA	NA
EPA Brownfields Assessment (AVCOG and Maine DEP)	Assessment	Previously completed	~\$35k
CDBG*	Remediation	Unsecured	\$500k, demolition
Maine DECD Brownfields RLF	Remediation	Unsecured	\$500k, cover system and vapor mitigation
Senator Susan Collins Office	Remediation	Unsecured	TBD
Genesis Fund/CEI	Reuse	Secured	\$650k, purchase of Site
Low Income Housing Tax Credits (LIHTC)	Reuse	Unsecured (apply Spring 2024)	\$11.5M
State & Federal Historic Tax Credits	Reuse	Unsecured	\$6.8M, designated eligible
Maine Housing Subsidy & Mortgage	Reuse	Unsecured	\$8M
Deferred Developer Fees	Reuse	Unsecured	\$3M
Energy rebate	Reuse	Unsecured	\$500k

*Community Development Block Grant - This source of funding is complimentary to Brownfields funding as it addresses ineligible portions of the initial Site work needed to initiate redevelopment (i.e., demolition).



To date the Town of Oxford has also made commitments to the redevelopment through establishing the Site as a special zoning district to promote redevelopment and providing a tax abatement status. To mitigate cleanup costs relative to overall development, efficient use of materials for the future cover system design will be coordinated with the Site design such that portions of the redevelopment such as sidewalks, parking lots, new foundations and landscaping will be designed to serve as the soil cover system. Therefore, although this grant can't fund the full spectrum of cleanup needed for the mill, these efficiencies will keep environmental costs down by using design elements already planned for exposure prevention.

1.c.iv. Use of Existing Infrastructure

Recent development in Oxford has focused on sprawling commercial development along Route 26. This sprawling development has resulted in Oxford being in the 95th percentile for expected agricultural loss. Therefore, it is imperative in Oxford and the surrounding region, to preserve potential farmland and put Brownfield properties such as the Robinson Mill site back into productive use and to ensure anti-displacement policy. The proposed redevelopment plans to remove the majority of the circa-1980s warehouse style structures and reuse the original brick mill structures to restore the historic feel of the neighborhood. TCF is working with the Town of Oxford to establish a new TIF for the project to allocate funds for the maintenance of the onsite dam. The dam has been in severe disrepair since the 1990s preventing control of the water level of the adjoining Thompson Lake and threatening property values along the whole of Thompson Lake. This long-time need will finally be addressed through the redevelopment of the Mill.

The village is equipped with existing infrastructure to provide water capacity, sewer capacity, roads, telephone and electricity. Any improvements related to this redevelopment will benefit the surrounding community for generations to come.

2.0 COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

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

Oxford is a rural small town with population well under 10,000 (4,229, CENSUS 2020). Oxford (census tract 23017966400) is identified as disadvantaged because it meets several burden thresholds and is low income with a higher poverty rate than most of the state. The Town of Oxford relies on seasonal tourism for a large portion of the local economy; however, seasonal fluctuation and impacts on tourism in recent years (i.e., fuel prices and the pandemic) have impacted the flow of income to the community.

Targeted Area	Oxford	Oxford County	Maine
Population	4,229	57,777	1,362,359
Poverty Rate	14.1%	14.0%	10.8%
Median Household Income	\$52,368	\$51,384	\$69,543

The cost of housing has skyrocketed over the past decade making housing costs unaffordable for many people. In order to provide affordable housing, the use of grant funds and federal and state support is required to make a senior housing project like this viable. This property has sat vacant for several years and therefore the market alone has demonstrated that it cannot successfully redevelop this property. Therefore, additional grant funding and other subsidies are required in order to maintain affordability of the project. TCF is a small non-profit organization that has allocated all it existing available funds to other projects. The above statistics exemplify the need for organizations like TCF to assist in redevelopment; however, these cleanup funds are required to make this project a reality.



2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations: According to the Climate and Economic Justice Screening Tool, the Target Site is located within a disadvantaged Census tract (Tract 23017966400), as the population is at the 77th percentile for low-income combined with high energy costs, high incidences of asthma, transportation barriers, and 12% of the population without a high school education (in persons 25 years or older). Of the 2,929 residents over the age of 25, 12.4% have no high school diploma, and only 586 (or 20%) have a college degree, furthering the economic disparity. In addition, over 18% of Oxford residents are under 18 and nearly 29% are over 60, meaning that almost half of the population is either children or seniors, exceeding national averages in both respects. Further the Oxford household median income of \$52,368 is less than 75% of the state's (\$69,543). Similar statistics apply to the larger Oxford County. Oxford is also on the boundary between Oxford and Cumberland County, which is by contrast a much more densely populated and affluent county in Maine. Gentrification and migration of new residents from other parts of the country is pushing the lower income to middle class out of Cumberland County into Oxford County putting stress on the rural housing stock. The Town of Oxford had nearly double the housing stock constructed from 1970-1989 than it did in the combined 30 years since. Of these housing units, only 16% are rentals and with a substantial aging population potentially looking to downsize, there is a need for investment in affordable rental housing.

According to the 2012 County Health Rankings & Roadmaps for Maine, Oxford County ranks 15th for Health Outcomes (mortality and morbidity) and 13th for Health Factors out of 16 counties in Maine. This low ranking within the state indicates higher incidence of poor health behavior, lack of clinical care, poor socioeconomic conditions and limited access to recreational facilities and healthy foods. In contrast, the adjoining Cumberland County ranks in the top three for both categories. Therefore, with the migration of lower income population out of Cumberland County to Oxford County, they are also losing access to health resources. TCF's focus on creation of community within the proposed development that will be enabled by this grant will ensure some of these lifestyle characteristics can be maintained such as providing walking paths, a community room for socialization, and clean stable housing to minimize the stresses that often lead to poor lifestyle choices. Stable living in a well maintained environment greatly deter illicit activities both immediately within the new development and in the surrounding village.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: The Climate and Economic Justice Screening Tool (CEJST) indicates annual energy costs for the tract to be in the 94th percentile, suggesting supplemental wood heating is likely to be used in most homes. These socioeconomic constraints, poor Health Factors ranking, and frequency of supplemental wood heating are factors in the frequency of the population with asthma (91st percentile), which is the highest of all surrounding towns. Oxford county also ranks 5th of 16 counties in Maine for incidents of COPD emergency visits, the highest of the southern counties. These conditions are exacerbated by environmental contaminants to be addressed by this grant.

(3) Environmental Justice: (a) Identification of EJ issues: Oxford meets the definition of a disadvantaged community according to the Justice40 Initiative/EJScreen and CEJST. According to EJSCREEN, there are several additional environmental burdens on our sensitive populations, resulting in several EJ indices above the state average (particulate matter, air toxics cancer risk, traffic proximity, RMP facility proximity, USTs). These burdens are compounded by the Robinson Mill blight and pollution that depreciates the surrounding property value and propagates the inability to improve surrounding socioeconomic status. (b) Advancing EJ: The Brownfields grant



will initiate redevelopment into a modern and well maintained property adding 70+ new residents to the immediate community (the opposite of displacement). Further, by reoccupying the property, the public safety hazard is eliminated and illicit activity is discouraged. The revitalization will dramatically improve the character of the immediate community of which the dilapidated Robinson Mill makes up approximately half of the developed area.

2.b. Community Engagement

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

To date, TCF has engaged with the Town Manager, Adam Garland, and Planner to discuss our plans for the site and determine/confirm how to proceed. The process for creation of a TIF District has been initiated by the Town with the first step of presenting to the planning board in November 2023. The TIF will provide funds for the maintenance of the dam and provide the housing development a real estate tax break. The Town is also working to initiate zoning changes for increased density allowed in Redevelopment district. TCF has also engaged with finance partner Genesis Loan Fund to acquire the property.

As the Grist Mill dates to the earliest establishment of the village, the Historical Society is engaged in discussions on methods for preservation of this structure. The Historical Society will also be the recipient of historical equipment and any artifacts remaining in the mills for incorporation into the Oxford Historical museum collection. They are also supportive of redevelopment of the remainder of the mill.

2.b.ii. Incorporating Community Input

To date, TCF have met with the above listed Town officials to share our vision, seek community need, ask for guidance on zoning, and discuss creation of a TIF district. Next, TCF will be presenting the project at a public meeting to the Select board and obtaining their permission to work with the Town Manager on the creation of a TIF district. The Town advised that once the permission has been issued, we will be in a position to more officially engage with the citizens of Oxford by organizing community meetings to present the cleanup plan and project, provide updates and seek feedback.

Specifically for this grant application, a public notice was issued requesting public input and interest on the project. On November 7, 2023, TCF held a virtual public meeting for the community's input on this application. No comments or questions from the public were received on the grant/project; however, as part of the grant process TCF will develop a Community Involvement Plan and will continually incorporate community input into the project beginning with cleanup design. Another public meeting will be hosted to go over the cleanup plan with a goal of educating future target occupants and the surrounding village on the EPA Brownfields process so that community members can understand what is happening to the property, what it may mean for them, and engage in questions and feedback. During cleanup and redevelopment, we will have two public meetings, one during draft ABCA to solicit feedback on remedial options selected and one during cleanup to update the community on the progress. We will also continually post project progress on our social media outlets so local followers can be kept up to date with news, photos, and a timeline. The project team will be available to answer any queries at all times to provide responses via email or telephone.

3.0 TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The first step in the cleanup plan is to contract with a Qualified Environmental Professional (QEP). Early grant activities will include finalizing the draft ABCA included in this application for



approval by the Maine DEP/EPA, application to the Maine DEP Voluntary Response Action Program (VRAP), preparation of a Quality Assurance Project Plan (QAPP), and community meetings/involvement. Once approved plans are in place, the cleanup grant will be used to support the beginning phase of the project that includes hazardous building material abatement and removal of universal and hazardous waste prior to demolition. Early Site work and soil management such as regrading, removal of excess soil and stabilization of Site soil after demolition will also be completed using the grant. Other activities for later phases of cleanup anticipated to occur after use of the grant and will be incorporated as part of the redevelopment include additional soil management, installation of the soil engineered barrier system, and installation of the vapor mitigation system beneath the buildings to be rehabilitated.

Hazardous building materials abatement will include asbestos abatement from the entire complex of buildings. Lead and PCB-containing paint will be removed from the mill building components planned for reuse to ensure the longevity of the cleanup and prevent future lead/PCB dust. After asbestos abatement, lead and PCB-containing materials from the remaining portion of the building that will not be reused will be completed by abatement by demolition and proper disposal of the construction wastes.

Based on the long history of industrial use and frequent reconfiguration and expansion of the mill, soil contamination is generally considered ubiquitous across the developed portion of the Site. It is impractical and not cost effective to remove all contaminated soil (estimated at up to \$2.5M); therefore, proper soil management is imperative to prevent exposure to the widespread contamination. Erosion and sedimentation control and compliance with an EMMP will prevent exposure to contaminated soils during construction and will protect the adjoining Thompson Lake and Little Androscoggin River from erosion from the Site considering climate change and flooding. Results of the Phase II suggest acid impacted soil beneath the current building foundation in the area of former sulfuric acid baths. Targeted removal of acidic soil will mitigate metals dissolution to groundwater and subsequent discharge of these metals to the river. During cleanup and reuse, engineering controls including dust suppression during site work and the use of temporary fencing will be utilized to protect the public and site workers. See attached preliminary ABCA for the discussion of cleanup alternatives and rationale for the selected cleanup approach.

3.b. Description of Tasks/Activities and Outputs

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

Task Activity: 1. Cooperative Agreement Oversight	
i.	Project Implementation: TCF has a dedicated position for management of project funding during redevelopment. Therefore, the following tasks are NON-EPA funded in-kind tasks. EPA-funded activities will be limited to minor QEP support for ACRES reporting. <ul style="list-style-type: none"> a. Prepare the Cooperative Agreement Work Plan b. Establish administrative time tracking to ensure adequate documentation for drawdown requests. c. Competitively Procure Qualified Environmental Professional (QEP) d. ACRES updates and Annual MBE/WBE Reports
ii.	Project Schedule: Fall 2024 and ongoing throughout grant
iii.	Task/Activity Lead(s): The Caleb Foundation and QEP support
iv.	Outputs: Grant Work Plan, EPA Quarterly Reports, MBE/WBE Reports, RFP, QEP contract
Task Activity: 2. Community Involvement	
i.	Project Implementation: The following EPA-funded activities will be performed to continually



- involve the public and our project partners in the cleanup of the site:
 - a. Enroll site in Maine DEP VRAP
 - b. Finalize CIP and Establish Information Repository
 - c. Host Public Meeting for Draft ABCA and solicit public interest
 - d. Notify and Update Immediate Community of Cleanup Schedule
- ii. Project Schedule: Fall 2024 – Summer 2025
- iii. Task/Activity Lead(s): TCF w/ QEP Support
- iv. Outputs: CIP, ABCA, Public Notices, Sign in Sheets, Meeting Minutes, Handouts, News Articles, Mailings

- Task Activity: 3. Cleanup Activities**
- i. Project Implementation: The following EPA Funded Cleanup activities are planned:
 - a. Finalize ABCA plan and prepare VRAP Work Plan and Environmental Media Management Plan (EMMP) and receive No Action Assurance Letter (NAAL) from Maine DEP
 - b. Prepare Site-Specific Quality Assurance Project Plan (SSQAPP)
 - c. Prepare/Finalize Bid Specifications and select contract through public competitive bid
 - d. Abatement of hazardous building materials and offsite disposal of contaminated building demolition debris
 - e. Soil Management - Consolidation/re-grading of soils meeting final site design
 - f. Non-EPA activities – Installation of the engineered barrier systems and vapor mitigation. To be funded in later phase of project with resource identified for Reuse (see Section 1.c)
 - ii. Project Schedule: Winter/Spring 2025 – Summer 2025
 - iii. Task/Activity Lead(s): QEP with support from the TCF project manager and construction team
 - iv. Outputs: VRAP Work Plan, EMMP, NAAL, SSQAPP, Bid Specifications, Remediation Contractor contract, Certified Payrolls, Davis-Bacon Interviews, Disposal Documentation, Abatement Notifications, Waste Profiles and Disposal Facility Approvals, Photos

- Task Activity: 4. Coordination and Final Reporting**
- i. Project Implementation: The only EPA funded activity that will occur for final reporting will be the Grant Closeout Report. Again, TCF labor will be in-kind with support from the QEP.
 - a. Later phase coordination with regulatory agencies and final VRAP reporting will be funded with resources for Reuse or with future DECD RLF funding during later phases of the project (if available)
 - ii. Project Schedule: Fall/Winter 2025
 - iii. Task/Activity Lead(s): TCF with support from QEP
 - iv. Outputs: Grant Closeout Report

3.c Cost Estimates

The proposed tasks and associated budgets are included in the following table and the basis for these budgets is summarized below:

Budget Categories		Project Tasks (\$)				Total
		Coop. Agreement Oversight	Community Involvement	Cleanup Activities	Coordination and Final Reporting	
Direct Costs	Personnel	0	0	0	0	0
	Fringe Benefits	0	0	0	0	0
	Travel	0	0	0	0	0
	Equipment	0	0	0	0	0
	Supplies	0	1,000	0	0	1,000
	Construction	0	0	445,500	0	445,500



	Contractual	5,000	5,000	42,000	1,500	53,500
	Other					
	Total Direct Costs	5,000	6,000	487,500	1,500	500,000
	Indirect Costs	0	0	0	0	0
	Total Budget	5,000	6,000	487,500	1,500	500,000

Task I: Cooperative Agreement Oversight: As indicated above, no grant funds will be used for TCF’s grant administration. The contracted QEP will support ACRES reporting on a quarterly basis (Approx. 35 hrs \$140/hr).

Task II: Community Involvement: TCF community outreach and involvement will also be provided in-kind. \$5,000 for QEP time to finalize the ABCA and prepare the Community Involvement Plan, assist in community outreach, and participate at the BAC/public meetings (40 hours at \$120/hour on average); \$1,000 in supplies that will comprise a project sign, newspaper advertising, and presentation materials.

Task III: Cleanup Activities: TCF will coordinate with the QEP and facilitate a public bidding process at an estimated cost of \$4,000 (28 QEP hours at \$140/hr). Preliminary estimates for the cleanup include \$506,000 in asbestos abatement and hazardous building materials disposal (contractor estimated), \$346,000 in initial soil management indicating sufficient eligible cleanup activities to utilize the construction budget. Additionally, \$40,000 in contractual costs for application to the Maine DEP VRAP (including ~\$6,650 application fee), SSQAPP, engineering, design, bidding, and performing on-site oversight, clearance sampling, and documentation during cleanup (~230 hours at \$100/hr) plus \$10,000 in laboratory expenses.

Task IV: Coordination and Final Reporting: Final VRAP reporting will largely occur after completion of the EPA grant during future phases of the project. Under this grant, TCF will prepare the Final Grant Closure Report with support from the QEP at an estimated amount of \$1,500 (10 hours at \$140 per hour).

3.d Plan to Measure Environmental Progress and Results

During grant implementation, the mechanism for tracking, measuring, and evaluating progress (short and long-term) is measured through our quarterly EPA reports in the EPA ACRES database. Environmental results will be closely measured as part of monthly progress meetings with the full design and construction team. Grant drawdowns and review of the Cooperative Agreement Work Plan will ensure project schedule, project budget, identify various work tasks, benchmarks, and milestones are documented. Tangible outcomes of the Brownfields grant program will also be recorded in ACRES.

4.0 PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

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

TCF’s Project/Grant oversight will be performed by Suzanne Decavèle, TCF's Director of Acquisitions. Suzanne has overseen the development of multiple multi-family housing projects and brings over 10 years’ experience managing successful multi-million dollar projects. Suzanne will manage the project with support from TCF’s Development consultant, Andy Jackson and TCF’s construction manager Matt Sawyer. Wendy Thomas, TCF’s Finance Director, will perform financial management of the grant. She has worked in residential, commercial and construction accounting for over 30 years.

TCF has been in existence for over 30 years developing and managing 1,900 units of affordable housing across New England and has a few more projects in the pipeline, the Robinson



Mill included. Its model is such that the Director of Acquisitions develops the project. Once financing is lined up, the construction manager oversees the construction. Finance processes the requisitions and payments, with assistance from the Director of Acquisitions who prepares them and files all necessary paperwork for loan/cooperative agreement compliance.

4.a.iii. Acquiring Additional Resources

TCF will competitively bid QEP and construction resource in accordance with 2 CFR 200.319 to receive multiple proposals, evaluate them based on criteria and award the contract to the firm that best meets those criteria. TCF has extensive experience in procuring subcontractors from prior development projects throughout New England. RFPs will be carefully worded for compliance with 2 CFR 200.319 and will work with EPA so they have substantial involvement in the contractor selection process. TCF is also supported by a local Development Consultant well versed in the contractors and available resources in Maine.

4.b. Past Performance and Accomplishments

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

4.b.ii.(1) Purpose and Accomplishments

The Caleb Foundation (TCF) received a Brownfields Revolving Loan Fund (RLF) subgrant, in the amount of \$200,000, for the Old Woolen Mill in North Berwick, ME that led to the development of 40 affordable housing rental units for individuals over the age of 55. This grant experience is reciprocal to that of this Site specific EPA Cleanup grant.

TCF has extensive experience managing real estate developments projects and the tax credits and grants that allow them to come to life. The majority of our project portfolio is financed with Low Income Housing Tax Credits and subsidies (federal and state) awarded by the states indicating TCF to be well versed in obtaining this type of funding that represent the bulk of funding for the target project (see Section 1.c). FHLB Boston also has contributed substantially to past projects. These projects require compliance with the cooperative agreement, quarterly reporting of progress, documentation for drawdowns (including Davis Bacon). Therefore, this extensive experience directly parallels that of the EPA Brownfields grant administration.

4.b.ii.(2) Compliance with Grant Requirements

TCF keeps a strict watch on projects. We have not had any issues with compliance for any of our grants. Past projects ran on time and on budget. Throughout phased work plans, TCF holds public meetings to keep the community updated on how every phase of a project is going, if there are any bumps, if we are on budget, if we aren't; how we plan to fix it, and so on. We have a history of receiving grants. We follow the reporting requirements of the various grants in a timely fashion. We strive on keeping our funders informed in all aspects of a project as we move forward.

THRESHOLD CRITERIA DOCUMENTATION

1. Applicant Eligibility

Eligible Entity: The Caleb Foundation is 501(c)(3) tax exempt non-profit organization (See **Attachment 1**)

2. Previously Awarded Cleanup Grants

The Caleb Foundation has never received an EPA funded Brownfields Cleanup Grant and this site has not received funding from a previously awarded cleanup grant.

3. Expenditure of Existing Multipurpose Grant Funds

We affirm it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Caleb Foundation obtained ownership of the Site via fee simple title on November 9, 2023

5. Basic Site Information

(a) Name of Site: Robinson Mill

(b) Address of Site: 283 King Street, Oxford, Maine 04270

6. Status and History of Contamination at the Site

(a) Type of Contamination: Hazardous Substances

(b) Operational History and Current Uses: By at least 1795 the Site was developed with a dam, woolen mill, sawmill, and gristmill. Periods of fire and industrial redevelopment occurred through the 1800s until 1865 when the earliest of the existing mill buildings was constructed and operated by Robinson Manufacturing, a woolen mill. The second original mill building was constructed in 1898. Robinson Manufacturing continued operation into the 20th century with a period of expansion between 1960 and 1993 and then closure of the mill in 2003. The mill has remained vacant since that time and is currently degrading and a public safety concern.

(c) Environmental Concerns: Based on due diligence and environmental sampling conducted to date, the primary environmental concerns at the property include the presence and potential exposure to hazardous building materials, contaminated soil including potential acidic soil, and vapor intrusion to future residential buildings.

(d) How the Site Became Contaminated: Through the long history of industrial use and frequent fires during the early mill use in the 1800s, the Site has ubiquitous PAHs and metals across the Site. Historical woolen mill operations utilized and stored bulk quantities of acids, oils, and xylenes in USTs and ASTs, as well as smaller quantities of many other hazardous materials (primarily solvents for cleaning) through interior storage areas. Metals in groundwater are suggestive of a release of acid to soil beneath the sulfuric acid bath in the northern portion of the mill. Additionally, Phase II ESA results indicated the presence of VOCs beneath the foundation exceeding the Maine DEP soil vapor screening levels indicating vapor intrusion concerns for future Site buildings. Additionally, considering the timeline of the building construction and expansion, hazardous building materials,

including asbestos, lead in paint, and polychlorinated biphenyl (PCB)-containing materials, are present throughout the building(s).

7. Brownfields Site Definition

- (a) The Site is not listed or proposed to be listed on the National Priority List
- (b) The Site is not currently 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 jurisdiction, custody, or control of the United States Government

8. Environmental Assessment Required for Cleanup Grant Applications

Several Environmental Assessment have been completed at the Site including the following:

- May 18, 2022, Phase I Environmental Site Assessment prepared by Ransom Consulting, LLC
- November 9, 2022, Phase II Environmental Site Assessment prepared by Ransom Consulting, LLC
- January 15, 2023, Site Specific Quality Assurance Project Plan prepared by Credere Associates, LLC
- May 30, 2023, Supplemental Phase II Environmental Site Assessment prepared by Credere Associates, LLC
- October 19, 2023, Phase I Environmental Site Assessment prepared by Credere Associates, LLC

9. Site Characterization

The Site has been adequately characterized and is eligible for, and an application is intended to be submitted to, the Maine DEP Voluntary Response Action Program (VRAP) for Maine DEP's approval, if awarded the grant. A letter from the Maine DEP is included as **Attachment 2**. A sufficient level of characterization has been performed to allow for remediation work to begin on the site following VRAP approval.

10. Enforcement or Other Actions

We affirm there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. Sites Requiring a Property-Specific Determination

The Site does not require a property-specific determination. This Site is not considered part of a special class as defined below:

- properties subject to planned or ongoing removal actions under CERCLA
- properties with facilities that have been issued or entered into a unilateral administrative order, a court order, an administrative order on consent, or judicial consent decree or to which a permit has been issued by the United States or an authorized state under the Resource Conservation and Recovery Act (RCRA), the Federal Water Pollution Control

Act (FWPCA), the Toxic Substances Control Act (TSCA), or the Safe Drinking Water Act (SDWA)

- properties with facilities subject to RCRA corrective action (§3004(u) or §3008(h)) to which a corrective action permit or order has been issued or modified to require the implementation of corrective measures
- properties that are land disposal units that have submitted a RCRA closure notification or that are subject to closure requirements specified in a closure plan or permit
- properties where there has been a release of PCBs and all or part of the property is subject to TSCA remediation
- properties that include facilities receiving monies for cleanup from the Leaking Underground Storage Tank (LUST) Trust Fund (see Appendix 1 for a definition of LUST Trust Fund sites)

12. Threshold Criteria Related to CERCLA/Petroleum Liability

(a) Property Ownership Eligibility - Hazardous Substance Sites

iii. Landowner Protections from CERCLA Liability

(1) Bona Fide Prospective Purchaser Liability Protection

- a. Information on the Property Acquisition: The Caleb Foundation acquired the property by negotiated purchase from a private entity, Oxford Revitalization LLC, by fee simple title on November 9, 2023. The Caleb Foundation has no familial, contractual, corporate, or financial relationship or affiliations with Oxford Revitalization LLC.
- b. Pre-Purchase Inquiry: The Caleb Foundation procured an Environmental Professional to perform an ASTM E1527-21 Phase I Environmental Site Assessment. The Phase I ESA was completed by Credere Associates, LLC and dated October 19, 2023.
- c. Timing and/or Contributions toward Hazardous Substance Disposal: All hazardous substance disposal occurred prior to The Caleb Foundation acquiring the property.
- d. Post Acquisition User: The Site has not been used since acquisition and will not be used until redeveloped.
- e. Continuing Obligation: There are no continuing releases known to be occurring at the Site. To prevent future release, the property has been resecured to prevent unauthorized access and vandalism until the remaining containers of waste can be removed from the structure. This will also prevent exposure to trespassers. The Site will otherwise remain unoccupied until redevelopment occurs. To prevent the spread of contamination during redevelopment, construction will follow approved plans and specifically an Environmental Media Management Plan to be prepared as part of finalization of the ABCA and application to the Maine DEP VRAP. The Caleb Foundation confirms they will:
 - i. Comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;

- ii. Assist and cooperate with those performing the cleanup and provide access to the property;
- iii. Comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- iv. Provide all legally required notices.

(b) Petroleum Sites: Not Applicable

13. Cleanup Authority and Oversight Structure

- (a) Cleanup Oversight: Per Criteria 9 above, through participation in the Maine DEP VRAP, Maine DEP will provide technical review and comment on all plans, reports, and activities pertaining to cleanup of the Site. If awarded, EPA will also have substantial involvement in the approval process and review of technical documents including the ABCA and any Quality Assurance Project Plans (QAPPs). The Caleb Foundation will competitively procure a Qualified Environmental Professional (QEP) according to provisions of 2 CFR §§ 200.317 through 200.327 as one of the first steps in the grant process prior to implementing remediation activities at the Site. The QEP will prepare programmatic plans including the ABCA, VRAP Application, QAPPs, and Community Involvement Plans (CIPs), supporting preparation of bid documents, obtain and evaluate remediation contractor bids, coordinate and oversee remediation activities, perform any confirmatory/clearance sampling, and document the remedial actions pertinent to the VRAP No Action Assurance Letter and Brownfields Program, ABCA/RAP, and other cleanup documents.
- (b) Adjacent Property Access: The site is bordered on all sides by residential properties with the exception of the Marina to the south. The Site has sufficient perimeter buffer to be able to access all areas of the Site for remedial activities without access to adjacent properties. The Caleb Foundation will work closely with the Post Office that adjoins the grist mill to ensure work does not impact their operations; however, access to the property will not be necessary.

14. Community Notification

- (a) Draft ABCA: A draft Analysis of Brownfields Cleanup Alternatives (ABCA) has been prepared for public review and is included in **Attachment 3**.
- (b) Community Notification Ad: A Public Notice was posted in the local Advertiser Democrat newspaper as well as in the consolidated Maine Press Association notices board on October 19, 2023, notifying that a copy of the grant proposal and draft ABCA were available for public review and comment between October 25 and November 8, 2023, how to comment on the drafts, where the drafts could be reviewed, and the date and time of a public meeting.
- (c) Public Meeting: The Caleb Foundation conducted a public meeting on Tuesday, November 7, 2023, at 5:00 PM to gather comments on the draft Brownfields Cleanup Grant application being submitted to the EPA and the draft Analysis of Brownfields Cleanup Alternatives (ABCA) for the cleanup of the Site. The meeting was held remotely via a Zoom link provided to any persons. No comments or questions from the public were

received on the grant/project. It is anticipated that more public interest will occur now that the property has been acquired and activity will be reinitiated at the property.

(d) Submission of Community Notification Documents: The required documentation including a copy of the Public Notice (from two locations), a meeting sign in sheet, and confirmation of no public interest to date are included in **Attachment 4**.

15. Contractors and Named Subrecipients

N/A – a contractor has not been procured and no subrecipients are planned.



JANET T. MILLS
GOVERNOR

STATE OF MAINE
DEPARTMENT OF ENVIRONMENTAL PROTECTION



MELANIE LOYZIM
COMMISSIONER

October 11, 2023

The Caleb Foundation
Attn: Suzanne Decavèle
270 Broadway
Lynn, MA 01904

Dear Suzanne Decavèle:

The Maine Department of Environmental Protection (Department) acknowledges that The Caleb Foundation plans to conduct the cleanup of a brownfield site and is applying for a FY24 EPA Brownfields Cleanup Grant.

The Caleb Foundation has developed an application requesting site-specific federal Brownfields Cleanup funding for the Robinson Mill Site, located at 283 King Street, Oxford, Maine.

The Department affirms that the Robinson Mill Site:

- i. Is eligible to be enrolled in the Department’s voluntary response program;
- ii. Is not currently enrolled, but The Caleb Foundation intends to enroll the site in the voluntary response program; and
- iii. Has had a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

For any questions regarding this letter, please contact me at 207-215-8597.

Sincerely,

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

cc: Katy Deng, EPA Brownfields Region 1

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