



Town of Jaffrey, New Hampshire
10 Goodnow Street
Jaffrey, New Hampshire 03452
603-532-7880
603-532-7862 fax

NARRATIVE INFORMATION SHEET Section IV. D.

Response to RFP No.: EPA-OLEM-OBLR-23-15

Town of Jaffrey, NH Clean-up Grant

November 10, 2023

1. Applicant Identification:
Town of Jaffrey
Town Office
10 Goodnow Street
Jaffrey, New Hampshire 03452-5415
2. Funding Requested
 - a. Assessment Grant Type: Single Site Cleanup
 - b. Federal Funds Requested: \$2,019,400
3. Location
 - a. City/Town: Jaffrey, 03452-5415
 - b. County: Cheshire County
 - c. State: New Hampshire
4. Property Information:
 - a. W.W. Cross
 - b. 39 Webster Street, Jaffrey, New Hampshire 03452-5415
 - c. Tax Map 245 Lot 7.2
5. Contacts:
 - a. Project Director (Project Manager):
Jo Anne Carr, Director of Planning & Economic Development
Town Office
10 Goodnow Street
Jaffrey, New Hampshire 03452-5415
Phone: 603-532-7880 x110; Fax: 603-532-7862 (fax)
e-mail: jacarr@townofjaffrey.com
 - b. Chief Executive/Highest Ranking Official:
Jon Frederick, Town Manager
Town Office
10 Goodnow Street
Jaffrey, New Hampshire 03452-5415

The Town of Jaffrey prohibits discrimination on the basis of race, color, national origin, sex, sexual orientation, religion, age, disability, marital or family status.

The Town of Jaffrey is an equal opportunity employer.

Phone: 603-532-7880 x101; Fax: 603-532-7862 (fax)
 e-mail: jfrederick@townofjaffrey.com

6. Population: The Town of Jaffrey has a population of **5,320**
 (Reference: US Census, 2020 Decennial Census)

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	Pg 1
The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.	NA
The proposed brownfield site is impacted by mine-scarred land.	NA
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Pg 3
The proposed site is adjacent to a body of water (i.e., the border of the proposed site 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).	Pg 1
The proposed site is in a federally designated flood plain.	NA
The reuse of the proposed site will facilitate renewable energy from wind, solar, or geothermal energy.	Pg 2
The reuse of the proposed site will facilitate or will incorporate energy efficiency measures.	Pg 2
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Pg 2
The target area is located within a community in which coal-fired power plant has recently closed (2013 or later) or is closing.	N/A

8. Releasing Copies of Applications
 There are no parts of this application which are confidential.



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

EMAIL ONLY

November 6, 2023

Jon Frederick, Town Manager
Town of Jaffrey
10 Goodnow Street
Jaffrey, NH 03452

Subject: Town of Jaffrey
FY24 Proposal for EPA Brownfields Cleanup Grant
W.W. Cross Site, Jaffrey, NH

State Letter of Acknowledgement and Support

Dear Jon Frederick

The New Hampshire Department of Environmental Services (NHDES) acknowledges that the Town of Jaffrey plans to conduct the cleanup of a brownfield site and is applying for a FY24 EPA Brownfields Cleanup Grant.

The Town of Jaffrey has developed an application requesting site-specific federal Brownfields Cleanup funding for the W.W. Cross site located at 39 Webster Street in Jaffrey, NH.

NHDES affirms that the W.W. Cross site:

- i. Is eligible to be enrolled in the NHDES voluntary response program;
- ii. Is currently enrolled in the NHDES voluntary response program;
- iii. Will have a sufficient level of site characterization outside of the footprint of the existing building (which is unsafe to enter) from the environmental site assessment performed by June 15, 2024, for the remediation work to begin on the site. Brownfields Cleanup funding will allow for demolition of the site building and access to contamination located within the building footprint. NHDES understands that limited characterization of the contamination within the building footprint will occur following building demolition and before the soil remediation phase of the site cleanup.

Should your proposal be successful, NHDES will commit to providing a liaison for technical support, facilitate the process of reviewing and approving all cleanup-related submittals to NHDES, and participate in any community outreach efforts.

We look forward to working with the Town of Jaffrey on this important project within your community. Please contact me should you have any questions.

Sincerely,

Scott Drew, P.G.
Brownfields Program
Hazardous Waste Remediation Bureau

Jon Frederick
Town of Jaffrey
November 6, 2023
Page 2 of 2

Tel: (603) 271-2890

Email: Scott.T.Drew@des.nh.gov

cc: Jo Anne Carr, Town of Jaffrey
Dorrie Paar, EPA New England – Region 1
Jeffrey Marts, P.G., Administrator, NHDES-HWRB
Amy Renzi, P.G., State Sites Supervisor, NHDES-HWRB
Melinda Bubier, NHDES-HWRB

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION – (55 points)

a. Target Area and Brownfields (15 points)

i. Overview of Brownfields Challenges and Description of Target Area (5 points)

Jaffrey, NH is located in southwest New Hampshire, a predominantly rural region and home to Mount Monadnock, one of the world’s most climbed mountains. Lying at the intersection of US Route 202 and NH Turnpike 124 and only 80 miles from Boston, Jaffrey was a manufacturing hub in the late 19th to early 20th century. Jaffrey’s population grew to its peak in 2000 at 5,487. Now Jaffrey’s population at 5,320 (U.S. Decennial Census, 2020) is showing a decline overall and a trend to an aging community.

Since the 1970’s employment in low-tech mechanical manufacturing has declined. Downtown businesses such as W.W. Cross, (our target site), Warwick Mills (textiles) and D.D. Bean (paper matches), were rooted along our rail corridor and waterways. Many of the old factories now sit underutilized or vacant, deteriorating, and creating blight in Jaffrey’s downtown, including the W.W. Cross site. It is the legacy of the “old” factories which creates obstacles to attracting “new” industry, to sustainable growth, and to wellness.

According to EnviroAtlas, there are 6 Jaffrey brownfield sites in the ACRES database, 1 NPL SEMS, and 79 inactive and 10 active RCRA sites. Over 90% of which are concentrated in Jaffrey’ Census Data Place (CDP), the Target Area of this grant. This is a very high number of sites for a small, rural community that has limited means to combat the sites’ environmental, health and blight impacts. This grant is crucial to promote the cleanup and redevelopment work that is needed for economic revitalization and to solve our senior and workforce housing needs.

ii. Description of the Proposed Brownfield Site (10 points)

At the east edge of downtown, the circa 1915 W.W. Cross site is an empty vandalized, partially burned, 100,000+ square-foot former tack factory on 11 acres. The Site includes the former waste water lagoons that historically discharged directly to Cheshire Pond, an impoundment to the Contoocook River. The northeastern portion, approximately 5 acres, of the property is subject to a NH Department of Environmental Services (DES) Groundwater Management Permit (GMP) for monitoring an existing closed tack pile landfill and CVOCs and other contaminants related to the prior use. The monitoring is the responsibility of the prior owner.

This grant is for the remaining area, approximately 7 acres, a brownfield that does not have a financially viable entity that can tackle the remaining cleanup needs. Previous environmental assessment work identified CVOCs, PAHs, cadmium and arsenic in soil and groundwater beneath the building’s former plating room; surface soils with creosote and PAH-impacts and suspected leaks from an inactive heating oil tank that is bedded in vermiculite asbestos. Asbestos, lead and PCBs are known to be present throughout the dilapidated building, which pose immediate and long-term health risks to local residents and future site users.

The EPA Emergency Planning and Response Branch (EPRB) became involved at the Site in 2021 due to a building fire which impacted a significant quantity of known asbestos-containing material at the Site causing a threat to public health. EPA partially demolished the building, eliminating imminent risk caused by air-transported debris, but the hazardous building materials persist within the partially burned building, along with other soil and groundwater impacts.

The Town has been actively engaged with NH DES and EPA Region 1 to address clean-up concerns directly related to the building demolition and remediation of building materials, groundwater and soils removal beneath the plating area of the building. *The objective of this grant proposal is to abate hazardous building materials, demolish the building, remove and dispose of contaminated soils and other waste associated with the site.*

b. Revitalization of the Target Area (20 points)

i. Reuse Strategy and Alignment with Revitalization Plans (10 points)

The redevelopment strategy for the Site is for a mixed-use commercial/retail space combined with moderate income residential uses which provides a community gathering space for youth, families and our seniors. Planning and study initiatives guide the downtown revitalization efforts and inform community leadership. Through the current Town’s current Brownfields Assessment Grant, a Real Estate Market Analysis was completed in July 2023. The Market Analysis consisted of public meetings, individual stakeholder interviews and data research through local and regional labor market services and the US Census American Community Survey. The study found, “the W.W. Cross site is a unique opportunity for Jaffrey to be more competitive in the residential, retail, and hospitality market.”

“Downtown Revitalization – Community Conversations” convened in October and November of 2022 gathered public feedback identifying opportunities to engage the tourism trade, address the needs of seniors for housing and social engagement, and young families for grocery shopping and walkability, and grow retail business and restore or redevelop commercial buildings.

The Select Board and Office of Planning and Economic Development embarked on a Community Workshop “Re-Imagining the W.W. Cross Site” June 15, 2019 facilitated by NJIT¹. The primary goal of this workshop was to garner community members’ ideas on the future uses of this Site. Workgroup members solicited feedback from their representative constituencies including conservation, youth sports, recreation, renewable energy interests and those interested in town history. Community reuse interest centered on development incorporating energy efficiencies and renewable energy in a new mixed-use development. The vision is of a community center, small grocer and retail space and housing for our workforce and seniors. The team agreed on the merits of the W.W. Cross site as an anchor site for downtown re-development.

Over the years, Jaffrey has collected public feedback on the use of the site including community meetings and workshops associated with the Downtown Plan (2009), a Community Charrette (2010), a series of Downtown Dialogs (2012) and recent Master Planning updates through 2022. In recent years, community organizations in Jaffrey have focused their efforts on revitalizing the Downtown; *all aspire to turn Downtown Jaffrey into a dynamic and diversified center where business and community can thrive.*

This proposal supports the EPA’s Strategic Plan Goal 6 through safeguarding and driving community revitalization and meets Objectives 6.1 and 6.2 through the cleanup and restoration of land and redevelopment in support of a healthy community.

ii. Outcomes and Benefits of Reuse Strategy (10 points)

This project benefits families seeking affordable, efficient housing and provides much needed commercial space for a small grocery store and restaurant gathering place. At approximately 11 acres, the Site has the largest footprint of potential economic development in the entire Downtown district. Longer term planning includes upgrading the adjacent rail bed as a connector to rail trails to the north and south. Benefits of the reuse strategy includes improved health and nutrition among the downtown population, increased economic development and improved social capital and access to pedestrian amenities.

The Town Code requires that all workforce housing projects be at a minimum, energy star compliant. Jaffrey adopts the State building code as it is updated, which requires energy compliant measures in new construction. This Site is prime for a model mixed use and moderate-income housing development and will be highly visible to residents downtown and traffic moving through Town. In addition, the Town and its project partner, Monadnock Economic Development Corporation (MEDC) will seek funding through the NH Low-Moderate Income Solar Project Funding program to install rooftop solar panels. Given the Site proximity to Cheshire Pond and the Contoocook River, green stormwater infrastructure will be incorporated into the Site design to provide climate resilience.

In keeping with the history of the manufacturing and the former building construction and its location along the former rail line, the rooftop will incorporate design elements such as sawtooth skylights and signage documenting the history of manufacturing and importance of the rail network in delivering goods.

c. **Strategy for Leveraging Resources (20 points)**

i. Resources Needed for Site Characterization (5 points)

The Town is currently utilizing an EPA Brownfield Assessment grant to characterize the extent of contamination and prepare the draft ABCA and Remedial Action Plan. Our QEP has indicated confidence that the extensive assessment activities over 6 years (PH I, II and supplemental ESAs) the extent of cyanide, cadmium and other waste products from the plating operations and hazardous building materials within the building, extents of soil impacts outside the building have been safely characterized for purposes of this cleanup grant and that the requested funding is enough to complete remediation of the Site.

¹ The New Jersey Institute of Technology, Technical Assistance to Brownfields Communities (NJIT TAB) designed and conducted this workshop in partnership with the Office of Planning and Economic Development.

Application for U.S. EPA Brownfields Cleanup Grant - Narrative Criteria

Town of Jaffrey, New Hampshire

A SSQAPP amendment has been authorized to complete soils testing near the perimeter of the building. The Town is confident that any additional assessment activities as necessary will be complete prior to June 15, 2024 and we have sufficiently characterized the Site at this time to pursue this cleanup grant.

ii. Resources Needed for Site Remediation (5 points)

This grant application will address the funding needed for building demolition, hazardous building materials abatement, soil excavation and disposal, and disposal of other wastes. If the Site is enrolled in the NH DES Brownfield permitting program, funding for long-term monitoring costs are expected to be borne through the Downtown Tax Increment Finance District.

As the building is in unstable condition, the Town notes our continuing obligation to secure the Site. The Town remains in close contact with our brownfields partners in the NH DES and Region I EPA keeping all apprised of the situation. Additional resources which may be required post building demolition to further assess soil and groundwater conditions may be sought as necessary through the Southwest Region Planning Commission (SWRPC) and NH DES Brownfields Program.

iii. Resources Needed for Site Reuse (5 points)

Name of Resource	Is the Resource for (1.c.i.) Assessment (1.c.ii.) Remediation (1.c.iii.) Reuse Activities	Is the Resource Secured or Unsecured	Additional Details or information About the Resource.
SWRPC	1.c.i. Assessment	Unsecured	SWRPC Brownfields Assessment Grant. Jaffrey has secured funding in the past for this Site.
NH DES	1.c.i. Assessment	Unsecured	NH DES Brownfields Assessment Program
MEDC	1.c.iii. Reuse	Secured	Agreement to partner on redevelopment planning and implementation and has a Brownfields RLF.
Eversource/electric supplier	1.c.iii. Reuse	Secured	Rebates can be applied for at any time.
Public Utilities Commission	1.c.iii. Reuse	Unsecured	The PUC issues RFPs annually for financing low-moderate income solar projects in multi-family housing.
Tax Increment Financing	1.c.iii. - Reuse	Secured	The Site is within the Downtown TIFD.
Tax Relief District	1.c.iii. Reuse	Secured	The Site is within the Tax Relief District for Community Revitalization. Provides a 5-year property tax hiatus for development and rehab for housing and economic development.
Revolving Loan Fund	1.c.iii. Reuse	Secured	The Town has a USDA/RBEG ² Loan fund to support small business development.
Economic Revitalization Zone	1.c.iii. Reuse	Secured	The Town has adopted the NH BEA ³ program to provide business tax credits for new investment, redevelopment and job creation.
NHHFA ⁴	1.c.iii. Reuse	Unsecured	Housing agency supporting developers, renters and new low- moderate home buyers. Applications are on a rolling basis.

² USDA/RBEG – United State Department of Agriculture Rural Business Development Grant

³ NH BEA –New Hampshire Bureau of Economic Affairs

⁴ NHHFA – New Hampshire Housing Finance Authority

iv. Use of Existing Infrastructure (5 points)

The W.W. Cross site is located in the downtown area where design guidelines inform new development and redevelopment. The Site has close access to U.S. Route 202, the major east/west corridor to our neighboring New England States. Municipal water and sewer, parking and transportation access, and 3-phase power are all in place. The Town also recently implemented a Town wide broadband installation in partnership with Fidium Fiber providing high speed internet service. Reuse of this Site promotes smart growth principles.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (40 points)

a. **Community Need (25 points)**

i. The Community's Need for Funding (5 points)

New Hampshire is without a state income tax, thus relying on local property taxes for much of the state revenues. The Town of Jaffrey is among the top 8 of 260 communities with the highest property tax rates in the State at \$30.98/\$1,000⁵ valuation. We also have the dubious distinction of having some of the highest water and sewer rates in the State. Jaffrey is a small town of 5,320. With extensive indebtedness for our water and wastewater infrastructure, and increasing costs for road maintenance, our citizens are already stretched to cover basic needs. We are a low-income community, with the median income at \$68,222 according to the 2021 American Community Survey, compared to the State median of \$83,449. Without this grant, we do not have the resources to cleanup and redevelop the W.W. Cross site that is much needed to pursue the redevelopment and revitalization of our downtown.

ii. Threats to Sensitive Populations (20 points)

(1) Health or Welfare of Sensitive Populations (5 points)

The Town, due to its low population, does not trigger thresholds using the CEJST screening tool. According to EJSCREEN however, there are several sensitive populations within our Target Area, including low income (65th state percentile), less than high school education (62nd percentile) and over age 64 (69th percentile). The Town also has 8.3% of veteran population, compared to 6.9% nationwide.

The residents in the Jaffrey CDP have a high poverty rate and high number of single head of households who face a myriad of issues, not the least is the rate of opioid addiction, threat of homelessness and lack of access to health care and fresh food.⁶ According to reports from the Jaffrey Public Safety personnel, W.W. Cross has been a magnet for vandals, and as the weather turns cold, those seeking shelter.

Jaffrey is a Main Street Community with reuse at the heart of the revitalization plans. The downtown neighborhood is comprised of multifamily units, predominantly occupied by low/moderate income, single head of household families with young children. By addressing brownfields blight in the mixed-use district, we will promote economic development, housing rehab projects, the creation of affordable housing, and access to local food that will benefit our most vulnerable citizens. The Town seeks assistance in the remediation of the Site so it is no longer a *burden* but an *asset* to the neighborhood and community at large.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 points)

According to EJSCREEN, the Target Area is at the 79th national percentile for asthma and 76th percentile for cancer, both of which are exacerbated by exposure to contaminants. Additional health data at the county level (see table) is representative of these conditions. Many cancer-causing agents (PAHs or solvents) have been identified at W.W. Cross and a nearby former brownfield.

Coal combustion residuals in surface soils at W.W. Cross add to lead burdens; 5 of the 83 children aged 0 – 72 months tested in Jaffrey had elevated blood lead levels measured at 5+ ug/dL⁷ (6.0%). Sadly, testing rates throughout NH have been on the decline since 2019, therefore there is no current data on blood lead levels for children living in Jaffrey. In addition, the failing W.W. Cross building harbors mold and asbestos building products that pose respiratory risks to trespassers, children and the homeless. This grant will reduce exposure to related contaminants by cleaning up the Site and returning it to productive use.

⁵ NH Department of Revenue Property Tax Rates, 2022.

⁶ Personal Communication, Town of Jaffrey Welfare Director.

⁷ NH Division of Public Health Services, Childhood Lead Exposure by Town (Jaffrey), 2018.

Finally, New Hampshire is among the top 17 states with the highest rate of opioid involved deaths. In 2021 statewide, there were 419 drug overdose deaths, age adjusted to 30.7 deaths per 100,000 persons⁸. In Jaffrey, according to our Public Safety personnel, we have had 14 overdoses treated with Narcan and 2 overdoses resulting in deaths this year. This represents an equivalent of 37.6 deaths per 100,000.

Statistic	Cheshire County	State	US
Overall Cancer Incidence (age adjusted rate for 1,000,000) ⁹	480.8	476.0	442.0
Lung Cancer incidence (age adjusted rate per 100,000)	57.9	60.8	54.0

(3) Environmental Justice (10 points)

a. Identification of Environmental Justice Issues (5 points)

In addition to brownfields, the sensitive populations in the Target Area, our CDP, are exposed to multiple other environmental burdens. According to EJSCREEN, Pb paint indicator is at the 68th percent nationally, Superfund proximity at the 76th percentile and Hazardous Waste Proximity at the 61st percentile. Ozone is also at the 55th percentile in the state, despite the rural character of the town. These factors, along with the poverty and welfare status faced by the Downtown residents, constitute Environmental Justice issues.

A recent report delivered to the Town by Southwestern Community Services (SCS)¹⁰ highlights EJ issues, such as children at risk, poverty, as well as lack of access to safe transitional and affordable housing. In addition, the report points to nutritional and health needs for new mothers, children and emergency food assistance in our CDP. It must be noted that the Town’s Head Start program lies directly across the road from the W.W. Cross building. Jaffrey is also a food desert, with no grocery or small market, there is no access to fresh healthy food in our Town. A total of \$959,125 has been delivered by the SCS to our families and individuals in the CDP (population 3,058). A note to this important contribution by SCS is the Town’s overall operating budget of \$7,156,964. Approximately 12% of our budget is supported through our county social services organization for our at-risk residents.

Living and working near derelict properties contributes to long term health and wellness decline. Controlling environmental risk, removing neighborhood blight, and providing opportunity for increased income once reuse plans are realized, will turn the tables for these same disproportionately affected populations, neighborhood children and the homeless.

b. Advancing Environmental Justice (5 points)

Jaffrey’s long-time residents, often on fixed or modest incomes, are suffering increasing rents and property taxes that press them into a housing crisis, already tight with a less than 1% vacancy rate. By providing a small grocery, restaurant and community space, mixed with moderate income housing this project can overcome some of these obstacles. We note that as the blighted property is redeveloped and exposure to hazardous contaminants is removed, the neighborhood becomes far more attractive to additional investment and new development. The proposed reuse strategy incorporates community goals to support our at-risk residents in the target area by providing access to secure affordable housing, a grocery and community space; these end uses will prevent displacement given that they will be financially accessible to existing residents. The W.W. Cross site can be an anchor around which community revitalization can occur.

b. Community Engagement (15 points)

i. Project Involvement (5 points) and ii. Project Roles (5 points)

The project partners will be advisory to the cleanup grant program and form the local Brownfields Advisory Committee (BrAC). They will function as a steering committee reporting and making recommendations to the Town Manager, Project Manager and Select Board. The BrAC represents a wide constituency and will likely include more stakeholders as the program evolves. By expanding the stakeholder representation and

⁸ <https://www.drugabuse.gov/opioid-summaries-by-state/new-hampshire-opioid-summary>

⁹ <https://www.statecancerprofiles.cancer.gov/incidencerates/>

¹⁰ Southwestern Community Services 2023, City/Town Report, October 2023.

membership on the BrAC, we go far to ensure environmental justice issues are addressed for our low-income families, youth and seniors.

Partner Name	Point of Contact	Specific Role in the Project
SWRPC - supports 31 Cities and Towns in the southwest region of NH	Joshua Mack jbmack@swrpc.com	Advise on brownfield cleanup program. SWRPC has led the regional brownfields program for two decades and will help with outreach and communications
MEDC – a regional organization supporting economic development	Cody Morrison codym@monadnockcdc.org	Partner in redevelopment program and Brownfields RLF
Jaffrey Energy Committee – a local Jaffrey committee appointed by the Select Board to promote adoption of energy efficiencies	Kevin Chamberlain Jaffrey.chamberlain@gmail.com	Advise on energy efficiency opportunities through funding and grant programs through the Public Utilities Commission and others.
Jaffrey Climate Initiative – a local organization with a mission to move the Town to 100% renewable	Elizabeth Webster maplewater@aol.com	Advise on renewable energy and sustainable design. Provides educational workshops and training.
TEAM Jaffrey - a member of the National Main Street America	Tarah Castiglioni teamjaffrey@gmail.com	Jaffrey’s Main Street Program; provides small business development & support. TEAM provides access to training, business plans, marketing and public events that highlight our downtown and businesses

iii. Incorporating Community Input (5points)

The BrAC will convene in the first quarter of the grant period and at semi-annual meetings as necessary to take in progress and make recommendations. Each of these members is responsible for reporting back to their constituents and taking feedback. Public input will be solicited, considered and responded to in a meaningful way. Meetings will be public, in person and hybrid, noticed and advertised.

As our impacted population is not tied in to town committees and meetings, we will communicate project progress through multiple platforms. We will utilize a project Facebook page where town staff will post updates regarding project cleanup progress and proposed redevelopment plans. Jaffrey is a community of face to face exchanges, which will be achieved in part through the BrAC committee members. In addition, a regular written update will be posted to the Town website and made available in print at the Town library and Town Office. Periodic press releases will also be submitted to the local newspaper.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS (55 points)

a. Proposed Cleanup Plan (10 points)

The Town’s goal for redevelopment of the W.W. Cross Site is to address the key community needs of housing, and lack of access to local food markets and dining options. The Town recently acquired the Site in October 2023, and intends to further support its clean-up for anticipated mixed-use development. The cleanup effort will include technical assistance and guidance from the New Hampshire DES.

Fire damage to the Site building and its subsequent deterioration have compromised the structural integrity and prevented access to impacted soils beneath the building footprint. In addition, asbestos, lead containing paints (LCP) and PCB-containing paints remain within unstable areas of the buildings, and exposed areas provide a direct pathway for release(s) to the environment. The building cannot be restored and reused for any purpose, therefore demolition and removal of the Site building and associated structures is necessary.

Prior to/during demolition, all ACM will be properly abated. In sections of the Site building which are not safe to access for abatement, that portion of the building will be demolished, and the entire waste stream will be disposed of as asbestos waste. In conjunction with this phase, LCP and PCB coated materials and remaining universal wastes will be segregated and properly handled and disposed of. The remaining 20,000-gallon No. 6 fuel oil AST, and six out of service exterior transformers will also be properly removed and disposed.

Following building removal, impacted soils beneath and in proximity to the building will be excavated for off-site disposal at an appropriately licensed landfill or recycling facility. Once the HBM have been remediated and the dangerous building remnants have been removed, limited soil testing will be performed beneath the building slab, as needed, to complete the delineation and characterization of the soil impacted by releases of wastes from the former plating room, wastewater treatment area, and other potential contaminant source areas. Funding for this assessment work is not part of the cleanup grant and will be secured through the SWRPC and NH DES.

b. Description of Tasks/Activities and Outputs (including 3.b. i., ii., iii., iv.) (25 points)

Tasks are critical to: (1) establishing a successful program, (2) engaging the community, (3) remedial action planning for site cleanup, and (4) cleanup activities and planning for reuse in line with our community vision.

Task/Activity 1: Cooperative Agreement Oversight
i. Project Implementation: Formally assemble and meet with the Brownfield Advisory Committee (BrAC), EPA and DES and establish a meeting schedule Q1, Q2 and Q4 then twice each year, thereafter; select a QEP through a competitive process, per 40 CFR 30 and other applicable federal and state rules and guidance pertaining to procurement Q2; develop, organize and administer Brownfields initiatives including: coordinating public outreach and education Q2; provide ongoing grant management and reporting through Q16. Eligible Town programmatic support (hourly pay rate plus fringe) and QEP services are EPA grant funded; EPA and DES staff assistance are separately funded.
ii. Anticipated Project Schedule: Q1 through Q16.
iii. Task/Activity Lead: Town Project Manager (TPM) with QEP support.
iv. Outputs – Form BrAC, QEP RFQ and contract, ACRES inputs quarterly and MBE/WBE reporting.
Task/Activity 2: Community Outreach and Engagement
i. Project Implementation: Engage stakeholder organizations in semi-annual BrAC meetings; introduce the public to brownfields through an initial Public Outreach Meeting (POM); provide updates at monthly Select Board, Planning Board and Economic Development Council meetings. Provide brochures and program information at the POM and the Town Office. Meeting minutes, responses to enquiries, reports and plans will be available at the Town Office and as PDFs on the Town website; updates and notifications will be posted on the Town bulletin boards and on the Town Facebook page. Public events will be advertised, ADA compliant, and provide language accommodations. Town and QEP services are EPA grant funded; EPA and DES staff are state and federal funded.
ii. Anticipated Project Schedule: BrAC meetings Q1, Q3, semi-annually. POM Q3; additional outreach/updates as needed at monthly Select Board meetings through Q16.
iii. Task/Activity Lead: Town Project Manager (TPM) with QEP support.
iv. Outputs: Community engagement plan, meeting notes, fact sheets, press releases.
Task/Activity 3: Site Specific Activities
i. Project Implementation: Complete final ABCA, SSQAPP and RAP for the Site in accordance with EPA and DES program requirements. Conduct community meetings to confirm RAP. The selected remedial action(s) will be determined based on metrics such as cost, feasibility, and effectiveness in protecting human health and the environment and consider the reuse plans for the site. Prepare bid specifications and competitively bid cleanup activities, prepare cleanup contracts. EPA grant funds will be used. QEP will be directed to investigate additional Brownfields Assessment funds as necessary when supportable/eligible.
ii. Anticipated Project Schedule: The ABCA, SSQAPP and RAP will be completed in Q2, bid specification in Q3 and bidding/contracting in Q4

iii.Task/Activity Lead: QEP with oversight by TPM
iv.Outputs: Final ABCA, SSQAPP, RAP and VCP application bidding documents and contracts.
Task/Activity 4: Oversee Site Cleanup
i. Project Implementation: Oversight of building demolition and hazardous building materials abatement, soils excavation and disposal, and disposal of other wastes. QEP to perform oversight and waste characterization and confirmatory sampling, weekly construction reports, Davis Bacon compliance, and preparation of a Remedial Action Implementation report. Public engagement continues through this phase. EPA grant funds will be used for this task.
ii. Anticipated Project Schedule: Cleanup will begin in Q4 with abatement/demolition, and continue through Q7 with soil remediation (weather dependent).
iii.Task/Activity Lead: QEP for ABCA and RAP. QEP will oversee and direct cleanup to be performed by selected remediation contractor. QEP will coordinate with TPM.
iv.Outputs: Final ABCA and RAP, construction reports, cleanup completion reports VCP and COC.

c. Cost Estimates (15 points)

Task 1 – Cooperative Agreement Oversight –\$8,960 is budgeted for 160 TPM hours at \$40/hour plus fringe (40% of hourly rate). The TPM will attend two EPA national Brownfield conventions; assumed costs for travel, lodging and expenses is \$4,000. Contractual expense is for QEP programmatic support (general assistance, ACRES reporting, etc.) is estimated at \$6,000, 50 hours at \$120/hour.

Task 2 – Community Outreach and Engagement –\$7,280 is budgeted for 130 TPM hours at \$40/hour plus fringe, and include \$600 supplies for outreach materials and mailings for 2 community meetings. QEP support is estimated for described tasks at \$6,000, 50 hours at \$120/hour.

Task 3 – Site Specific Activities –The budget assumes \$28,000 for the QEP at 240 hours \$120/hour to complete final ABCA/RAP, SSQAPP, DES VCP application, bidding plans and specifications, conducted bidding and complete contracting. TPM time for report review and interfacing with DES, EPA is budgeted at \$2,800 for 50 hours at \$40/hour plus fringe.

Task 4 – Oversee Site Cleanup – \$4,480 is budgeted for 80 TPM hours at \$40/hour plus fringe; \$60,480 is budgeted for 504 QEP hours at \$120/hour to oversee site cleanup activities, collect samples, and prepare a remediation report. Laboratory fees are estimated to be approximately \$50,000 (25 waste characterizations at \$1,200 each and 50 confirmatory samples for PAHs/TPH/metals at \$400 each). Based on the draft ABCA and budgetary estimates received from an environmental contractor, we anticipate cleanup costs to include \$550,000 asbestos abatement (approximately 20,000 sqft floor tile and roofing at \$26/sqft, plus 3,000 cf vermiculite at \$10/cf); \$520,000 demolition and disposal of buildings, universal wastes, fuel oil tank, and transformers; \$770,000 soil excavation, transportation, and disposal of soils beneath the building and inclusive of minimally impacted soils adjacent to the building foot print (5,500 tons at approximately \$140/ton).

Our budgets are provided below:

Budget Categories		Project Tasks (\$)				Total
		Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach & Engagement	Task 3 Site Specific Activities	Task 4 Oversee Site Cleanup	
Direct Costs	Personnel	\$6,400	\$5,200	\$2,000	\$3,200	\$16,800
	Fringe Benefits	\$2,560	\$2,080	\$800	\$1,280	\$6,720
	Travel	\$4,000	\$0	\$0	\$0	\$4,000
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$600	\$0	\$0	\$600
	Contractual	\$6,000	\$6,000	\$28,800	\$60,480	\$101,280

	Construction	\$0	\$0	\$0	\$1,890,000	\$1,890,000
	Other	\$0	\$0	\$0	\$0	\$0
	Total Direct Costs	\$18,960	\$13,880	\$32,200	\$1,954,960	\$2,019,400
	Indirect Costs	\$0	\$0	\$0	\$0	\$0
	Total Budget (TDC+IC)	\$18,960	\$13,880	\$31,600	\$1,954,960	\$2,019,400

d. Plan to Measure and Evaluate Environmental Results (5 points)

Consistent with other federally funded grants awarded to the Town, we will manage this project utilizing time-proven techniques to ensure project funds are efficiently expended within the grant period. The TPM and our QEP will meet monthly to review status of project progress, schedule, and budget. We will track key metrics for each Task via EPA quarterly reports and the ACRES online database.

The prepared reports will document progress and program outputs. We will ensure that reports are distributed to DES, EPA for review and approval before finalizing. Outputs from this program include DES correspondence documenting acceptance into the program, RAP approval letters, and ultimately at the clean-up phase “Certificates of Completion” and “No Further Action” letters from the DES. Completing the work described above will transition the Site to reuse as envisioned by the community.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (30 points)

a. Programmatic Capability (15 points)

i. Organizational Structure (5 points)

The Town has successfully dedicated staff time and resources to multiple grant funded projects over time. As a small organization we meet on a bi-monthly basis to coordinate ongoing projects, share resources and expertise. We are a rural town with limited staff, and have to be efficient with our time and resources.

The Town of Jaffrey is well prepared to undertake this Grant Program. From the leadership of the Board of Selectmen providing policy direction by approving staff time and resources for this project, to the Town Manager’s responsibility as senior director for oversight, to financial administration and to project staff. A clear line of responsibility is made to effectively implement this grant with the Town Project Manager (TPM) tasked with grant oversight and enlisting Town senior and support resources as needed.

ii. Description of Key Staff (5 points)

Project staff include: (1) Jo Anne Carr, as TPM is the Director of Planning and Economic Development and manages the day to day operations of grants reporting and billing. Jo Anne has successfully secured funding for and completed projects through US EPA (including a prior brownfield clean-up and community-wide assessment grants), Northern Border Regional Commission (Cold Stone Springs Water Supply), US Economic Development Administration (water mains construction) and US Rural Development (Rural Business Enterprise) among others. (2) Jon Frederick, Town Manager, is the Chief Executive in charge of all aspects of contractual and supervisory roles in project management. (3) Elisa Fitzgerald, Finance Director, manages all grant and loan budgets for the Town and submits annual audits which have met statutory compliance requirements. All individuals have more than 20 years’ experience in their respective roles.

iii. Acquiring Additional Resources (5 points)

The Town of Jaffrey has had numerous successes with State and Federal loan and grant programs for achieving a wide array of community development goals such as housing rehabilitation, water and sewer facility upgrades, recreational facilities, land acquisition and transportation projects. The Town has demonstrated its capacity to manage multiple funding sources, successfully document progress and provide accurate and reliable record keeping for project accounts and in-kind services. We will continue to actively pursue additional funding to support reuse initiatives described herein. In addition, the Town will secure the partnership of the Monadnock Economic Development Corporation in reuse efforts. To this experience we will embrace the assistance of key resources such as the EPA, the DES, our selected QEP, and the Regional Planning Commission.

The Town will prepare RFQs and bid documents and advertise for QEPs and secure legal assistance as may be required. The Town of Jaffrey has standardized competitive procurement policies for acquiring professional

resources and will comply with 40 CFR 30. We will also work with the QEP to advertise employment opportunities to local residents and have fair labor practices as part of our QEP selection process.

b. Past Performance and Accomplishments (15 points)

i. Currently Has or Previously Received an EPA Brownfields Grant (15 points)

(1) Accomplishments (5 points)

Jaffrey is currently enrolled in a Cooperative Agreement with EPA for a Community-Wide Assessment of brownfields which funded the Environmental Assessments for the WW Cross site. Remaining budget for that work stands at \$130,000, further assessment efforts includes our second priority site, the Saint Patrick School which has been recently sold and the developers plan a demolition grant through the NH Bureau of Economic Affairs (BEA). Staff continue coordination on that site and are supporting their grant submission to BEA.

The Town also received a set of 3 clean-up grants in FY 2009 totaling \$600,000 for the remediation at the former Elite Laundry facility. Site conditions and potential risks highlighted the prior use of tetrachloroethylene (PCE) in dry-cleaning operations introduced at site in 1960s.

As part of the GMP for the Elite Laundry site the Town pursued a municipal regulation preventing use of groundwater and the development of wells within the Groundwater Management Zone. The State of NH DES Brownfields regulations require that each property within a GMZ have a note recorded on the deed indicating its location. As the properties within this district were owned by lower income families, or rental properties to low income, there was significant opposition to the proposed action on the deeds. The Town successfully pursued an alternative to the deed recordations, through the adoption of a groundwater management ordinance, the first of its kind in NH.

(2) Compliance with Grant Requirements (10 points)

The Elite Laundry site clean-up proposal involved in-situ chemical oxidation through the injections of permanganate, however an alternative treatment was ultimately chosen and approved by the EPA; in situ bioremediation using anaerobic biochem (ABC⁺)¹¹. This treatment plan was chosen due to the sensitive residential population nearby; ABC⁺ is considered a *green remediation technology* and is cost effective.

For the Elite Laundry cleanup grant all reporting requirements were met, and progress proceeded in accordance with the workplan in the cooperative agreement. ACRES records were updated as required. All three of the Elite Laundry sites were addressed, the Groundwater Management Permit was issued in November of 2016. Records of the clean-up effort, including outputs and outcomes were recorded in ACRES. Outputs included an approved RAP, public outreach meetings and the Certificate of Completion. Outcomes are source reduction and management of groundwater in a GMZ.

Early in the project, the NH DES provided an additional \$200,000 for assessment purposes, to trial a pilot study not eligible under the EPA rules. The Town sought a one-year no-cost extension from the EPA Cooperative Agreement to allow time for the study. The extension was granted and the project was completed according to the revised schedule and on budget.

Our current Assessment grant meets reporting requirements and funds are anticipated to be expended in the terms of the cooperative agreement.

¹¹ Anaerobic Biochem Plus (ABC⁺) is a registered product by Redox Tech, LLC. It works to feed the anaerobic bacteria in place which advance the breakdown of the present VOCs.

THRESHOLD CRITERIA FOR CLEANUP GRANTS

1 Applicant Eligibility

The Town of Jaffrey is an incorporated municipality of the State of New Hampshire and has the authority to enter into a cooperative agreement with US EPA. The Board of Selectmen are further authorized through Town Meeting approval to apply for and accept grants.

2. Previously Awarded Cleanup Grants

This site, known as W.W. Cross, has not received prior brownfields cleanup funding through the State or EPA. EPA did provide support through its Emergency Planning and Response Branch (EPRB) after a fire on June 21, 2020, to assess and remove a large debris pile of primarily asbestos-containing material.

3. Expenditure of Existing Multipurpose Grant Funds

The Town does not have a Multipurpose Grant.

4. Site Ownership

The Town of Jaffrey is the sole owner of the parcel relating to this cleanup grant request. Subject deed is recorded at the Cheshire County Registry of Deeds, Book 3260 Page 1308, dated October 16, 2023.

5. Basic Site Information

The site is located at 39 Webster Street, in Jaffrey, Cheshire County, New Hampshire, 03452. The site is identified as Tax Map 245, Lot 7.2, 39 Webster Street, Jaffrey, New Hampshire. The geographic coordinates are Latitude: 42.81621° North and Longitude: -72.01596° West.

6. Status and History of the Site

The W.W. Cross site is an abandoned former factory that manufactured tacks and fasteners for the upholstery, carpeting and shoe industry from 1916 until the late 1990s. The initial building configuration had the factory occupying the northeastern most portion of the building. By 1941, the Site building had been expanded to the south expanding the factory space and adding additional storage in the southwest. Factory space was further expanded by 1953. These additions created a building footprint similar to today. By 1953, a boiler room was added to the west of the side building. Between 1955 and 1975, a separate aboveground storage tank (AST) structure was built adjacent to the boiler room. Between 1975 and 1999, an eastern portion of the building was demolished.

In 2008, the most recent owners converted the former warehouse and manufacturing space to several separate tenant-occupied spaces, including a warehouse, gym and mailing service. Active business operations ceased in 2012 and the structures fell into disrepair.

In 2017, a Phase I Environmental Assessment (ESA) and a Hazardous Building Materials Inventory (HBMI) was completed ¹. In 2019 a Phase II ESA was completed on behalf of the Town in anticipation of taking the property by tax deed. EPA Removal Actions from October 27, 2021, through May 25, 2022, addressed the response to the 5-alarm fire on June 21, 2020. Subsequent studies, including a-Site Specific Quality Assurance Project Plan, Market Analysis for redevelopment, and the Supplemental Phase II ESA were completed under the Town's EPA

¹ Site Assessments and Studies for the Site can be found on the Town's website here:
<https://www.townofjaffrey.com/home/pages/reports-and-studies>

Brownfields Assessment Grant in November 2023. Following is a summary of the Phase II findings.

- In general, the top 5 feet of soil encountered at the Site consisted of very fine to medium sand and silt, and some fine gravel. Sporadically throughout the Site anthropogenic materials, including layers of crushed asphalt, crushed concrete, clinker, slag, and unknown fill material, were noted. It is unknown how much of the top 5-feet across the site is fill. Soil below 10-feet generally consisted of brown sand with some fine gravel and silt. Groundwater was encountered from 14 to 15 feet bgs.
- New Hampshire Soil Remediation Standard (SRS) exceedances of polycyclic aromatic hydrocarbons (PAHs) were identified in soil samples associated with an area of known creosote-type material impacts.
- NH SRS exceedances of PAHs were also identified in several other soil borings/samples across the site and were assessed to be a background condition associated with anthropogenic fill at the Site.
- Cadmium was identified above the SRC that is associated with a former metal plating area within the building.
- Two plumes of groundwater impacts with exceedances of Ambient Groundwater Quality Standards (AGQS) have been identified at the Site including a plume of tetrachloroethylene (PCE), 1,4-dioxane, cadmium, and PFAS beneath and downgradient of the site building; and a plume of PCE and trichlorethylene (TCE) from an upgradient, offsite location that is migrating onto the Site.
- Previously untested asbestos-containing materials (ACM) and supplemental sampling was completed, although no new asbestos was identified. Previously identified ACMs were confirmed to still remain in the building after the EPA removal actions, and where necessary the quantities of remaining ACM were updated.
- Additional suspect PCB-containing materials were identified and sampled. Three materials were identified above the 1mg/kg threshold to be regulated under the New Hampshire Solid Waste Rules and as an Excluded PCB Bulk Product Waste under TSCA. Three samples required elevated reporting limits due to matrix interference of the sample material. Due to the elevated reporting limit, it is inconclusive if these materials exceed 1 mg/kg. These materials are conservatively considered to contain a concentration of PCBs above 1 mg/kg but below 50 mg/kg.

7. Brownfield Site Definition

This Site meets the definition of “brownfield” per CERCLA §104 (k), is not on the National Priorities List, nor subject to orders under CERCLA, nor subject to jurisdiction, custody or control of the U.S. government.

8.Environmental Assessment Required for Cleanup Grant applications.

Several Studies have been completed since 2017. As follows:

- Hazardous Building Materials Inventory, Ransom Consulting, Inc., September 22, 2017
- ASTM Phase I Environmental Site Assessment, Ransom Consulting, Inc., October 31, 2017
- Site-Specific Quality Assurance Project Plan, Ransom Consulting, Inc., August 2018

- Phase II Environmental Site Assessment, Ransom Consulting Inc., March 19, 2019
- Site-Specific Quality Assurance Project Plan, Ransom Consulting, Inc., May 14, 2019
- Supplemental Phase II Environmental; Site Assessment, Ransom Consulting, Inc., March 31, 2020
- EPA Removal Action Pollution/Situation Reports October 27, 2021 – May 25, 2022
- Site-Specific Quality Assurance Project Plan, Credere, December 19, 2022
- Phase II Environmental Site Assessment, November 2023

9. b. Site Characterization

A letter from the New Hampshire Department of Environmental Services is attached to this application. Due to the instability of the building and contaminants of concern beneath the structure, additional site characterization may be necessary. The applicant is working with our QEP through the current EPA Community Wide Assessment Grant to determine the extent and cost of this work. We affirm this work, if necessary, will be complete by June 15, 2024 in order to begin remediation on the site.

10. Enforcement or Other Actions

There are no ongoing or anticipated enforcement actions on this site.

11. Sites Requiring a Property-Specific Determination

This site is not subject to a property-specific determination in order to be eligible for funding.

12 Threshold Criteria Related to CERCLA/Petroleum Liability

12. a. Property Ownership Eligibility – Hazardous Substances Sites

i. Exemptions to CERCLA Liability

(3) Property Acquired under Certain Circumstances by Units of State and Local Government

- a. The subject property was acquired by the Town through tax foreclosure.
- b. The acquisition was complete on October 16, 2023, the deed is recorded at the Cheshire County Registry of Deeds at Book 3260, Page 1308.
- c. The previous use of the property, a tack shop is believed to be the genesis of the historical contamination. Since acquisition by the Town, the buildings have been vacant and secured against further vandalism and with no additional activity occurring on-site.
- d. The Town affirms that it has not caused or contributed to any release of hazardous substances at the site.
- e. The Town affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site, not transported hazardous substances to the site.

ii. Not applicable

iii. Landowner protections from CECLA Responsibility

The Town of Jaffrey is not subject to liability under CERCLA §107, nor is the Town affiliated with any person or entity potentially liable for contamination at the W.W. Cross site as the Town was not the property owner at the time of disposal of hazardous substances. The Town has and will conduct All Appropriate Enquiry, as necessary, to be deemed an innocent landowner.

12. b. Property Ownership Eligibility

Does not apply.

13. Cleanup Authority and Oversight Structure

The site is currently enrolled in the New Hampshire Department of Environmental Services (NHDES) Hazardous Waste Site Remediation Program. The site is identified as NHDES site

#198708007. The NHDES has and will continue to lead the approval of all remedial activities at the site. The NHDES Site Remediation Project Manager Mr. Scott Drew will provide the Town of Jaffrey with regulatory and technical guidance to ensure the program is conducted in accordance with applicable NHDES regulations. The Town of Jaffrey Planning and Economic Development Department will manage the cleanup program with continued assistance from the Southwest Regional Planning Commission (SWRPC) Brownfields Advisory Committee. Mr. Jon Frederick, Town Manager will oversee the competitive bidding process required by federal law to secure an environmental consultant to undertake the cleanup.

The site is directly accessible by public roadways, bordered to the north by an abandoned railroad spur and elsewhere by residential and commercial properties. To the east is an existing onsite landfill and industrial lagoons subject to a prior Groundwater Management Permit. To the south are residential and commercial properties and a daycare center.

As necessary Access Agreements will be obtained from neighboring properties for additional monitoring. Cleanup activities are anticipated to remain on site. Continued access to neighboring and downgradient commercial and residential properties may be necessary to perform confirmation sampling and off-site monitoring of contamination migration in groundwater and soil vapors.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

The draft ABCA is available on the Town Website

b. Community Notification Ad

Community notification was made through the Town's website and Facebook pages on October 19, 2023.

c. Community Meeting

The Select Board included on their agenda the Notice of Community Meeting on October 23, 2023.

d. Submission of Community Notification Documents

The draft ABCA, posting to the Town website and facebook page, comments and response to comments as well as meeting minutes and sign in sheet are attached to this application.

15. Contractors and named Subrecipients

The Town does not plan to procure contractors or sub-recipients prior to executing a Cooperative Agreement. The Town affirms that it will comply with procurement standards a 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.