



FY 2024 U.S. EPA Brownfield Cleanup Grant Application
Narrative Information Sheet

R01-24-C-025

1. Applicant Identification

City of Somersworth
One Government Way
Somersworth, NH 03878

2. Funding Requested

- a. Grant Type Single Site Cleanup
- b. Federal Funds Requested
 - i. \$727,800
 - ii. Requesting a waiver of the 20% cost share requirement.
 - iii. Requesting a waiver of the \$500,000 limit. (\$727,800)

3. Location- City of Somersworth, NH

4. Property Information

261 Main Street Somersworth, NH 03878

5. Contacts

- a. Project Director
Michelle Mears, AICP Director of Planning and Community Development
City of Somersworth
One Government Way
Somersworth, NH 03878
(603)692-9517 mmears@somersworthnh.gov

Chief Executive/Highest Ranking Elected Official
Robert M. Belmore, City Manager
City of Somersworth
One Government Way
Somersworth, NH 03878
(603)692-9503 rbelmore@somersworthnh.gov

6. Population

11964 (U.S. Census 2020)

7. Other Factors Checklist

Applicants claiming one or more of the other factors below must provide a summary in the Narrative on the applicable other factor(s). Please identify which of the below items apply to your community/proposed project by noting the corresponding Narrative page number. If the factors do not apply, state N/A.

Other Factors

Other Factors	Page #
Community Population is 10,000 or less	N/A
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.	2-3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed 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).	N/A
The proposed site(s) is in a federally designated flood plain.	N/A
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	N/A
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	2
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	N/A

8. **Letter from the State or Tribal Environmental Authority:**

State: Attached New Hampshire Department of Environmental Services Letter.

9. **Releasing Copies of Applications**

Not applicable.



The State of New Hampshire
DEPARTMENT OF ENVIRONMENTAL SERVICES



Robert R. Scott, Commissioner

EMAIL ONLY

November 8, 2023

Michelle Mears
Director of Planning & Community Development
City of Somersworth
1 Government Way
Somersworth, NH 03878

Subject: City of Somersworth
FY24 Proposal for EPA Brownfields Cleanup Grant
Prince's Garage, Somersworth, NH

State Letter of Acknowledgement and Support

Dear Michelle Mears:

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

The City of Somersworth has developed an application requesting site-specific federal Brownfields Cleanup funding for the property known as Prince's Garage, located at 261 High Street in Somersworth, New Hampshire.

NHDES affirms that Prince's Garage:

- i. Is eligible to be enrolled in the NHDES voluntary response program;
- ii. Is currently enrolled in the NHDES voluntary response program;
- iii. Has a sufficient level of site characterization from the environmental site assessments performed to date for the remediation work to begin on the site.

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 City of Somersworth on this important project within your community. Please contact me should you have any questions.

Sincerely,

Melinda S. Bubier
Brownfields Program
Hazardous Waste Remediation Bureau
Tel: (603) 271-1169
Email: Melinda.S.Bubier@des.nh.gov

Waste
Management
Division

Digitally signed by Waste
Management Division
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1.a Targeted Area and Brownfields:

1.a.i Community and Target Area Descriptions:

Somersworth has the smallest area and third lowest population of the State's 13 cities. It is a small working class city located in the southern portion of Strafford County and across the Salmon Falls River from Berwick, Maine. Somersworth began as a grist and sawmill-centric community in the early 1800s. In 1822, Great Falls Manufacturing Company, a textile business with 3 mills, was established and other expansive brick mill buildings were later erected beside the river. Brick tenement row houses were erected for the immigrant workforce, and a thriving downtown emerged adjacent to the mills. Somersworth's downtown is populated by underutilized brick mill buildings, some in converted-reuse and many dilapidated and abandoned. The loss of the GE Plant, which once employed 2,500 workers, has had a detrimental effect on our downtown which now has many empty storefronts and derelict, multi-story former GE employee housing units within walking distance to the plant and downtown along Main Street. In addition, our downtown is home to a riverfront, 5 story, art deco, 563,409 square foot, former General Electric (GE) electric meter plant. The GE plant was the center of downtown for many decades; with housing, shops, and infrastructure constructed around it. At its heyday, GE employed close to 2,500 people. The building was sold in 2016 to a solar meter company, who only occupies 2 of the 5 floors and employs only 10 people. The Great Falls Manufacturing Company's largest mill was renovated for other uses in the 1980's, but then burned in a 2003 fire. The current (2021 ACS) manufacturing employment in the City is 1,228, about half its peak in 1990.¹

Somersworth's current economic conditions coupled with the loss and replacement of jobs with low paying wages has further eroded our ability to respond to the effects of the Brownfields in our community without outside assistance. The target area for this grant (Census Block Group 083001-2), where downtown businesses suffer, and there are vacant or severely underutilized spaces and substandard housing. Prime Tanning also owned a significant mill complex across the River in Maine that is currently undergoing brownfields cleanup thanks to EPA Brownfields Grants. The 200,000-sf structure, when it finally shuttered in 2008, included the loss of 150 jobs, some of which were residents of Somersworth. That site and the Prince's Garage Site is within close proximity to one another on either side of the Salmon Falls River. The closing of mills and loss of workforce on either side of the river has led to a lull in economic activity and the loss of investment downtown. The presence of underutilized and unmaintained buildings then drags down the adjacent buildings and leads to the perception that this community can be bypassed and is not worth future investment. The revitalization of this property will be the spur that the area needs for property owners to invest in their downtown properties.

1.a.ii. Description of the Proposed Brownfield Site: The J.A. Prince and Sons Garage site (Site) was initially part of a sawmill operation in the downtown among tenement housing and other industrial operations. The site was developed as an automotive service station in the 1940's and is one of the buildings from Somersworth's industrial past that was neglected and later abandoned. Located within blocks of the downtown core, this vacant site is suitable for redevelopment once the hazardous substances are removed. The City is working with a private developer that has a vision for the reuse of this property once the hazardous materials are removed.

The Site is comprised of a 0.737-acre lot identified on Somersworth Tax Map 9 as Lot 217, with once a 2,400 square foot commercial building with a slab-on-grade foundation. In November 2021, the building was demolished and all hazardous materials were removed and disposed. The Site was developed and

¹ New Hampshire Employment Security

utilized as a family-owned gasoline and services station from 1920 until 2015. when business operation ceased and the property was foreclosed by PNF Realty, Inc. the mortgage note holder. Currently, the City-owned Site is vacant and unutilized. Three gasoline underground storage tanks (USTs) installed in 1968 at the property were closed in 1988. Assessment of subsurface conditions during the closure indicated the presence of petroleum contamination from historical gasoline releases. A stockpile of petroleum impacted soil excavated during UST closure activities was aerated to reduce volatile compounds and then disposed off Site. The petroleum contamination was investigated and remediated in accordance with requirements of the New Hampshire Department of Environmental Services (NHDES) at the time. The Site was issued a Certificate of No Further Action; however, the Site continued to be utilized for automotive repair with use of solvents and possible waste streams containing metals and polychlorinated biphenyls (PCBs). Building disrepair, as well as release from storage drums, is recorded in City records and observations made during a 2020 site visit. The Site was also classified as an unlawful junkyard, with documented corrective action required.

1.b. Revitalization of the Target Area:

1.b.i. Reuse Strategy and Alignment with Revitalization Plans The cleanup of the Site, and the repurposing of the land into a mixed-use residential development component fits perfectly into the overall economic redevelopment plans for the downtown. These plans are supported by decades of visioning sessions, charettes, and master plans which have continuously called for mixed use development and public access to the Salmon Falls River. The City recognizes that many factors can change over a 5–10-year period. It is possible some of the project site might be needed for a mixed-use development that will help provide the necessary tax revenue to support the City in future years, as well as needed housing options.

The City has envisioned the Site to be redeveloped into mixed use property that takes advantage of its downtown location. The developer is also committed to reuse of the site with energy efficient building materials and ADA living units with the first-floor space for the physically disabled that incorporates a commercial workspace to be used. The developer is committed to creating an energy efficient project incorporating geothermal into the plans. This property is located in the Business Zoning district which allows restaurants as well as office and retail uses (which could occupy the second and/or third floors). In addition, the City is planning the extension of the Riverwalk from the downtown to the western residential neighborhood which would pass right by this property and connect to the downtown south of the Site.

This project aligns perfectly with the Livability Principles by improving economic conditions, investing in the health and safety of our community’s residents, and investing in rural downtown New England landscapes. Cleanup of this Site is also in keeping with the City’s Master Plan and Vision 20/20 which advocates for “continued revitalization of downtown”. It also is in line with a 2009 planning Charrette the City did for the downtown that envisioned a Riverwalk and “streetscape to capture 1 in 20 cars to stop/shop downtown” and a 2017 planning Charrette conducted for the nearby “Plaza Property” that will directly affect businesses all along Main and High Streets in the downtown. Existing utilities including City Water and Sewer and natural gas will be reused for onsite redevelopment, and public parking is available next to the Site.

1.b.ii. Outcomes and Benefits of the Reuse Strategy: Important outcomes and benefits of the reuse strategy include:

- a) The cleanup of the Site and the creation of new residential opportunities will eliminate one of the most blighted areas of the downtown and will thus act to incentivize other developers and investors to become more interested in being part of the City’s revitalization through creating new development and the repurposing of other structures in the historic downtown.
- b) This will result in new, upgraded, and energy efficient mixed-use structures which will benefit the City for many years.
- c) The cleanup and the creation of these incentives will be carried out without causing any displacement of, or adverse impacts to, any residents in this area. The proposed project will improve local climate adaptation/mitigation capacity by creating a modern and energy efficient development. The cleanup of the site will allow for redevelopment of the site under current regulations. These regulations consider stormwater treatment, how it flows from the site and affects surrounding properties and the community.

1.c.i-iv. Strategy for Leveraging Resources: It is important to take note of the fact EPA has already contributed significant assessment funds work. Strafford Regional Planning Commission (SRPC) allocated assessment funding through their EPA Brownfields Assessment program from 2020 through 2022. An initial Phase I ESA identified RECs at the Site that were confirmed in a Phase II ESA, with cleanup planning in a RAP/ABCA prepared for the site. These assessments make it possible for the City to seek and utilize these requested clean up funds. Specific to Brownfields, the City has previously leveraged NHDES Brownfields program to perform the environmental assessments and provide guidance to the City prior to Site acquisition. Below are the specifics:

Source	Purpose/Role	Amount (\$)	Status
SRPC Brownfields Assessment – Hazardous Building Materials	Identification of asbestos, PCBs, and lead containing building materials	\$10,000	Completed 5/24/21
SRPC Brownfields Assessment - Phase I	Assessment for potential RECs for prospective purchaser. Updated Phase I ESA for City acquisition	\$4,000	Completed 5/24/21 & 10/20/22
Private Investment	Building materials abatement and demolition of unoccupied auto service station	\$49,901	Completed 11/22/21
SRPC Brownfields Assessment – Phase II, RAP/ABCA	Evaluation of identified RECs and cleanup alternatives for verified impacts	\$75,000	Completed 9/16/22
Private Investment	Redeveloped Site Cost Estimate	Approx. \$2,000,000	Pending cleanup of site

Developer based private/public partnership; Reuse Activities [1.c.iii]; Unsecured; The City is actively working to be business friendly, and these partnerships are important to the future of the City. The partnerships can be used for small projects such as the preparation of a viable plan for the redevelopment of the site. If any utility upgrades are needed, they can be funded through the off-site improvement requirements per the Planning Board.

Criteria 2 Community Needs and Community Engagement

2a.i. The Community’s Need for Funding: This EPA Brownfields funding is critical to the ability of the City of Somersworth to proceed to the remediation and revitalization phase. Just as importantly, the

funding will help move the economic redevelopment of the target's core downtown area forward. The inability of the City to draw on other funding sources for this project is due to a combination of forces:

- a. Somersworth is the 3rd smallest city in the State of New Hampshire. The population estimate, per the US Census ACS 2021, is 11,964 persons.
- b. Somersworth is a struggling blue-collar community with mainly service sector jobs. While the unemployment rate is low, our residents are underemployed taking the only available service sector jobs resulting in median household income of \$68,762 for the City and only \$33,977 per capita income in the downtown target area. Individuals living below the poverty level in Somersworth is 10.9%. Somersworth's median household income was \$68,762. This compares to the State average of \$83,449.
- c. Somersworth is a small City both geographically and economically. It only has approximately \$1.134B in valuation (as opposed to Dover to our south with \$5.066B in valuation and Rochester to our north with approximately \$2.833B in valuation) yet still needs to provide the services of most larger cities. This results in a tax rate higher by a double-digit percentage than either of these neighboring towns.
- d. The property values throughout the City don't support the funding of an ongoing Capital Improvement Program [CIP] which addresses infrastructure problems in the downtown.

The economic well-being of the City of Somersworth suffered when the mills closed, and social and economic downward slide began. The downtown of the City was once regionally important, and it will be even more so today as positive change occurs. In the last decade, great strides have been made to change that historic reputation. The cleanup of the Site that will be facilitated by this grant, and the incorporation of that property into a refreshed City that sits adjacent to a great natural resource in the Salmon Falls River, is an important component of that revitalization opportunity. The City has a developer who is committed to redevelop the Site.

2.a.ii. Threats to Sensitive Populations:

(1) Health or Welfare of Sensitive Populations: A variety of indicators point to sensitive populations in Somersworth and the challenges that confront those populations. Low educational attainment, high reliance on food stamps, and the number of individuals living with disabilities emphasize the severity of the challenges faced by the population. The number of Somersworth families that have received Food Stamp / SNAP benefits in the past 12 months is 11.8% (and 14.98% in Census Tract 083001), Statewide it is 7.8%. The total minority population is 14.5%. The number of individuals in Somersworth with a bachelor's degree or higher is 25.1% of the population [25 years or older] while Statewide, it is 38.2%. The total population of persons with a disability in Somersworth is 14.67% compared to the NH state average of 8.9%². The cleanup of the Site, which will be facilitated by this grant, will eliminate the risk of exposure of Site contaminants to children and other sensitive populations and will help to incentivize overall economic growth in the downtown target area. Added growth means more property tax revenues [the primary revenue source for the City], which can help provide better municipal support systems for all residents.

(2) Greater than Normal Incidence of Disease and Adverse Health Conditions: The densely settled downtown Somersworth experiences high levels of traffic congestion. Air quality mitigation projects associated with a major expansion of NH Route 16 (which runs through Somersworth outside the downtown) have been completed in the region. The median housing age in the downtown area is 1939 which indicated likely

²Community Profile, Strafford Regional Planning Commission (2017-2022 ACS)

impacts from lead which can cause permanent neurological damage in children. EPA's Environmental Justice (EJ) mapper shows that Somersworth ranks in the: 90th for air toxic risk, the 94 percentile nationally for lead paint; and 95-100 percentile for superfund proximity. Many existing public health impacts increase the population's vulnerability to area environmental issues. Air quality impacts can have profound, systemic impacts on sensitive populations in particular. Compared to other states, New Hampshire experiences some of the highest rates of asthma. In Strafford County, 10.6% of both adults and children have asthma compared to 7% and 8.3% nationally.³ In NH, the asthma hospitalization rate for children under 4 and adults over 65 years is 188 and 127, respectively, per 100,000 persons. In 2010, 24,349 children with asthma were treated in NH. Researchers estimate that the environmentally attributable fraction for asthma to be 30%.

In addition to the former Prince's Garage, Somersworth is home to a municipal landfill Superfund site, many old mill complexes along the river, abandoned gas stations, aging auto repair shops, and an older housing stock. Known contamination at the Prince's Garage site, likely not yet discovered contamination at the 1950s era former GE plant where mills once stood and the abandoned gas stations/auto repair facilities, and likely lead contaminated soil from the older housing stock (i.e., lead paint) within the downtown each have a cumulative environmental impact, in particular to the Salmon Falls River. An active railroad passes through downtown and commuter traffic congestion also contribute to PAH and other carcinogenic pyrogenic contaminants in downtown.

(3) Promoting Environmental Justice: In addition to the environmental burden that sensitive populations suffer due to exposure to contamination and the presence of large, dilapidated mills, there are additional environmental injustices as indicated by EJSCREEN⁴. The Lead Paint indicator is at the 79th percentile statewide and 75th percentile nationwide, within the census tract 90-95th despite the rural character of the State. To bring a specific example of environmental justice associated with the Site to the forefront, there are several duplexes and multifamily rental units that abut the Site, and are predominately renters. There is a real benefit for these residents through the remediation of the site. Being low-income renters, they stay quiet and live thinking that this is acceptable. It is not acceptable! With the removal and cleanup of the garage, which will be facilitated by this grant, the lives of these residents will be drastically improved by reducing potential health risks and increasing the overall value of the neighborhood, and the associated environmental justice burdens for the surrounding community alleviated. While the Site has a fence, clear evidence of trespassing is observable. The risk of direct exposure of children to contaminants is particularly high due to the Site's status as an attractive nuisance and the presence of contamination in soil at the ground surface. It is also close to residential neighborhoods where kids may climb the fence and "explore" the derelict Site which is a danger to the neighborhood and the welfare of the residents, but risk of exposure to contaminants will remain until additional funding (i.e. this grant) can be obtained.

2b. Community Engagement:

2.b.i & ii Project Involvement and Roles: The entities listed below [Name; Point of Contact; Specific Involvement / Assistance] have significant interest in the improvements downtown and have participated in the strategic planning and oversight work in the past decade.

³ New Hampshire Division of Health and Human Services

⁴ EJSCREEN

Partner Name	Point of Contact (name, email & phone)	Specific role in the project
Strafford Regional Planning Commission	Lisa Murphy lmurphy@strafford.org 603-994-3500	Communication throughout the remediation process.
Somersworth Housing Authority	Deb Evans dievans@somersworthhousing.org 603-692-2864	Assistance with community engagement, communication throughout the remediation process.
Somedowntown LLC	David Baker [REDACTED] 617-695-2123	Partner to support the redevelopment and help with leveraging resources
City of Somersworth Developmental Services Department	Michelle Mears mmears@somersworthnh.gov 603-692-9517	Assist with grant management; consultant on the project; conduct community outreach; leverage financial and technical resources.

2.b.iii Incorporating Community Input: Community and public input will play a vital role in this remediation project. Comments received via any of the communication avenues mentioned below will be discussed and considered by staff and members of the economic development team. The plans to establish and maintain this input will include the following: public meeting on the proposed grant application with comment period. Updates at the monthly meetings of the City Council. These meetings are held in person and by televised live and available for viewing on the City website. In addition, meetings will be held via Zoom if required. Regularly updating the project entities listed above. Updates of project information will be posted to the City website, Facebook page, Newsletter, and Channel 22 which would broadcast updates about the project. Use of local news outlets [newspaper, radio], especially for all required meetings/hearings. Should interpreters for our immigrant residents or communication aids (visual aids for deaf/hard of hearing, etc.) be required the City will provide those at appropriate meetings. Should any issue arise that is deemed unsafe for residents, business owners, or sensitive populations the City will immediately halt work until the QEP, environmental contractor, and NHDES can be conferred to determine a resolution and it is determined to be safe to continue. The Somersworth Housing Authority (SHA) represents one of the closest residential abutters. SHA will act as a liaison to this residential population conveying information regarding the cleanup and collecting concerns from residents to bring to the City. They have agreed to distribute information and meeting notices to their residents both at the Bartlett and at other SHA locations around the City.

Criteria 3 Task Descriptions, Cost Estimates, and Measuring Progress

3.a. Proposed Cleanup Plan: The assessment activities revealed various contaminants that exceed Remediation Standards at the Site. Extensive soil delineation efforts indicate total petroleum hydrocarbons (TPH), polycyclic aromatic hydrocarbons (PAHs), and 3 types of metals [arsenic, barium, and lead] exceed cleanup and risk base standards. Soil contamination is present from the ground surface to depths up to 8 ft below surface attributed to poor automotive waste management, discharges to the ground surface, and former presence of a hydraulic lift system. To maximize the protection of public health, safety, and welfare, and to provide for the broadest reuse options of the project site, soil source removal has been selected. This work will involve the excavation of approximately 3,400 tons of soil exceeding applicable

remedial standards, short-term groundwater monitoring well replacement and remedial performance sampling, and all required sampling and reporting programs. All disturbed areas will be restored using clean fill, and all excavated materials will be stockpiled and transported to appropriately licensed off-Site disposal facilities.

3.b. Descriptions of Tasks/Activities and Outputs [i. Project Implementation; ii. Anticipated Project Schedule; iii. Task / Activity Lead; iv. Outputs]

Task/Activity 1: Program Management	
i. Project Implementation: EPA Funded:	The contracted QEP will prepare technical reports such as reports for updating ACRES and MBE/WBE reporting; maintain all files and records associated with the overall QEP project management work. Non-EPA Funded: City staff will: conduct the process of procuring a QEP; submit all required quarterly and financial reports; submit all Cooperative Agreement forms; oversee and manage all steering committee meetings; travel & attend EPA Brownfields Conference.
ii. Anticipated Schedule:	Formal funding will be available 10/1/24, but the City will initiate activity for the procurement of the QEP as soon as possible after the grant award is issued. Overall program management will run through the end of the grant period, by 9/30/26, or sooner if remediation and restoration work is completed sooner.
iii. Task/Activity Lead(s):	The City will lead all Non-EPA Funded Activities described above. The QEP will lead all the EPA Funded Activities outlined above.
iv. Outputs:	All required EPA reporting [ACRES, Quarterly and Financial Reports; M/W/DBE; Close Out report; RFQ for, and procurement of, QEP; regular Steering Committee meetings; general Cooperative Agreement oversight; attendance at National Brownfields Conference; grant drawdown requests.

Task/Activity 2: Community Outreach and Engagement	
i. Project Implementation: EPA Funded:	The QEP will: update to the ABCA, and associated presentation materials for the ABCA hearing; coordinate with the City on the preparation of the Community Relations Plan [CRP], which acts as a critical outreach and engagement tool; and provide technical updates for inclusion on the website. Non-EPA funded: City staff will: prepare information update; prepare correspondence to specific abutters when needed; work with the QEP on the CRP; coordinate all work associated with the ABCA update hearing; and perform overall coordination and management of this community-based program consistent with the CRP.
ii. Anticipated Schedule:	These tasks and activities will be performed during the entire grant period [10/2/24 to approximately 12/31/26].
iii. Task/Activity Lead:	The City will lead all community engagement meetings, activities, and website updates; QEP will coordinate with the City on all technical and engineering related issues.
iv. Outputs:	Community Relations Plan; updated ABCA; website updates throughout the entire grant period; public notice for meetings & hearings; open and transparent coordination and communications with all parties.

Task/Activity 3: Site Specific Cleanup Activities

<p>i. Project Implementation: EPA Funded: The QEP will: prepare all documents related to clean up [including final ABCA, QAPP, plans and preparation for bidding of contractors, updates, and reports]; support the City during the bid analysis process; obtain all necessary permits, oversee all phases of the cleanup activities; ensure contractor’s compliance with applicable rules, project design and specifications, and contractual obligations; perform all required confirmatory sampling throughout the cleanup work including PAH, metals, air monitoring and fugitive dust controls; monitor and ensure compliance with approved ABCA; maintain communications with EPA and NHDES staff throughout the cleanup. Non-EPA funded: The Project Manager will: monitor all phases of the cleanup work and coordinate with the QEP on a regular basis; act as the liaison between the contractor and any impacted city departments relative to road closures or other public safety measures; keep records of progress of the cleanup to be used for reporting to EPA or the State; provide updates for the website and City Council.</p>
<p>ii. Anticipated Schedule: These tasks will commence in early 2025; some site mobilization work could commence in late 2024; cleanup work would continue into 2025.</p>
<p>iii. Task/Activity Lead: The QEP will be responsible for all technical and engineering based cleanup activities; the City’s project manager will manage the flow of general information, project updates, and internal coordination with other City staff.</p>
<p>iv. Outputs: Updated ABCA, QAPP, bid specifications, and all written technical reports, maintenance of work sign-in sheets for all contractors, completion of cleanup activities and stabilization of site for eventual repurposing.</p>

<p>Task/Activity 4: Cleanup Close-out and Final Reporting</p>					
<p>i. Project Implementation: EPA funded: The QEP will: perform final inspections, communicate with State and EPA offices; prepare all close-out reports. Non-EPA Funded: The City will coordinate with and support all project management performed by the QEP and incorporate all relevant information into the Quarterly and Final reporting due to EPA.</p>					
<p>ii. Anticipated Schedule: Late fall of 2024 and through 2025-2026.</p>					
<p>iii. Task/Activity Lead: The QEP will manage all the technical cleanup matters, and the City will manage information flow for all community reporting and EPA reporting.</p>					
<p>iv. Outputs: Final cleanup and closure reports; all final reporting to EPA; ACRES; timely engagement and reporting to the community and all stakeholders; site work finished to allow for the next step of construction of the public park components.</p>					

3.c. Cost Estimates: The City is seeking \$727,800 in cleanup funding from EPA. These estimates were generated based Phase II Environmental Site Assessment and Remedial Action Plan dated September 13, 2022 with input from environmental professionals, and related experiences of the City with the previous cleanup grant. [Note: some minor rounding included, and adjustment for inflation]

	Task 1 Program Management	Task 2 Community Outreach & Engagement	Task 3 Site Specific Cleanup	Task 4 Close-out & Final Reporting	Totals
Direct Costs					
Personnel	\$3,500	\$3,500	\$0.00	\$0.00	\$7,000
Fringe Benefits	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00

Travel	\$3,500	\$0.00	\$0.00	\$0.00	\$3,500
Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Supplies	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Contractual	\$12,500	\$9,300	\$0.00	\$15,000	\$716,800
Construction	\$0.00	\$0.00	\$680,500	\$0.00	\$0.00
Other	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Total Direct Costs	\$19,500	\$12,800	\$680,500	\$15,000	\$ 727,800
Indirect Costs	0.00	0.00	0.00	0.00	0.00
Total Budget	\$19,500	\$12,800	\$680,500	\$15,000	\$727,800

*this accounts for a 15% inflation since finalization of the Former Prince’s Garage Phase II Assessment and RAP/ABCA

Cost Breakdown
Task/Activity 1: Program Management
Travel: Personnel=\$3,500 (70 hrs x \$50/hr);Brownfields Conference [airfare, meals, hotel] (\$3500); Contractual: QEP 80 hours @ \$155/hr. [\$12,500] for preparation of reports/documents [ABCA, update Work, Plan/QAPP, ACRES updates, and reporting, MBE/WBE certifications, etc.] throughout the grant period; bid specs and hiring of contractors, engineering design, and permitting for specific site cleanup components.
Task/Activity 2: Community Outreach and Engagement
Personnel= (70 hrs x \$50/hr); Contractual: QEP: 60 hours @ \$155/hr. [\$9,300] for ABCA public meeting / CRP work / monthly technical updates and related outreach for the public throughout the grant period.
Task/Activity 3: Site Specific Cleanup
Contractual: QEP: 216 hours @ \$125/hr. [\$27,000] for sampling, monitoring, and cleanup oversight. Confirmation and waste characterization analyses [\$11,500]. Excavation Contractor Mobilization and Demobilization [\$5,000]; Excavation and backfill 15 days at \$5,000/day [\$75,000] Transport/disposal 3,428 tons contaminated soil [\$515,000]; engineering support and QEP management [\$47,000]; cost have been adjusted 15% due to inflation since completion of the RAP/ABCA
Task/Activity 4: Cleanup Close-out / Final Reporting
Contractual: QEP: final inspections; ensure compliance with ABCA and all State/EPA requirements; final reporting and all close-out documents; complete ACRES management; 97 hours @ \$155/hr. [\$15,000]

3.d. Measuring Environmental Results: The City will measure and report on overall project performance through the required Quarterly and Financial Reports; updates to the City website, City staff, and to the elected City Council members and to the public by ways of meeting postings. The QEP will update the ACRES sites as the cleanup progresses. The EPA approved cleanup/work plan will act as the yardstick for all measurements. If there are delays in the project due to various outside issues, then these will be referenced in the Quarterly reports.

Criteria 4. Programmatic Capability and Past Performance

4.a. Programmatic Capability

4.a.i & ii. Programmatic Capacity and Key Staff: The City has substantial experience in grant administration. Oversight is a cooperative effort, and these key staffers will work together to manage and implement the EPA grant through to a successful end. City Manager, Robert M. Belmore is qualified to oversee the management of this Grant. He is the chief administrative official in Somersworth. Mr. Belmore has successfully assisted in the management of many City Grants, and has worked with NHDES and EPA Region 1 staff on past Brownfields Cleanup projects. Michelle Mears, AICP Director of Planning & Community Development, will serve as the project manager for this Grant. She has directed several other federally funded grants. The financial management of all Grants administered by the City is done by Scott S. Smith who serves as the Deputy City Manager/Finance Director. Mr. Smith has been working in this capacity since 2006. Legal Counsel will be provided by City Attorney, Laura Spector-Morgan as well as special Environmental Legal Counsel.

4.a.iii. Regarding Additional Resources: In the case where additional expertise is required, the City utilizes a competitive procurement process. This includes public solicitation of proposals, receiving proposals from multiple firms, evaluating the firms based on established criteria, and awarding a contract to the firm that best meets those established criteria.

4.b. Past Performance and Accomplishments

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant: The City of Somersworth has received a Federal Brownfields Grant for 1 Winter Street (\$200,000), and from various state and federal agencies totaling more than \$1M dollars. In all cases we have complied with all grant requirements, completed the grant on time, and met all reporting requirements. Hilltop School Brownfields which included 2015 SRPC EPA Assessment Grant Funds of \$12,625, clean up grant cost of \$30,000. The total invested to redevelopment of the site was \$3,850,000 which is now 22 residential apartments and six commercial spaces which are all occupied. EPA's investment of \$12,625 in grant funds helped spur an almost \$4,000,000 investment. 2017 NHDES - Brownfields Cleanup Revolving Loan Fund (RFL)–Cleanup Subgrant for Former Police Station in the amount of \$178,000 for building materials abatement and a temporary engineered barrier system. NHDES additional funding of \$97,450 RLF 2021. This project has been purchased by a private developer which is seeking approval for 6 residential units and 2 commercial spaces (the amount invested is to be determined).

4.b.i(1) Accomplishments: The former Breton's Cleaners project involved the cleanup of various contaminants [comingled TPH and PAH compounds in exterior debris piles, PCBs in the stained concrete in the garage, lead, asbestos, etc.] The remediation work plan included the following tasks: site characterization work; communication between the QEP and EPA and NH Dept. of Environmental Services offices; an ABCA was prepared and later amended to address significant mold and mildew problems in the garage building; the debris piles on the site were properly disposed of; all hazardous materials in the garage and the burned out former apartment building were collected and disposed of; and, the lead contaminated wood siding on the garage was removed and disposed at a site in western NY. Reporting to ACRES was completed in a timely fashion, and all outcomes were achieved.

4.b.i(2) Compliance with Grant Requirements: All required tasks were completed. The QEP submitted the required updates and reports, including ACRES updates. The City's project manager submitted all the required Quarterly and Financial Reports and the Final Project Report, and maintained regular communications with the EPA Project Manager. The City complied with all meeting and public involvement requirements.

City of Somersworth – Application for EPA Brownfields Cleanup Grant
In Response to Section III.B, Threshold Criteria for Cleanup Grants

1. **Applicant Eligibility:** The City of Somersworth affirms that it is a duly established and authorized general-purpose unit of local government within the State of New Hampshire.
2. **Previously Awarded Cleanup Grants:** The City of Somersworth affirms that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.
3. **Expenditure of Existing Multipurpose Grant Funds:** The City of Somersworth affirms that it has not received any Multipurpose Grant Funds from the EPA, and that there is no open Multipurpose Grant.
4. **Site Ownership:** The City of Somersworth purchased the subject property on March 27, 2023. The acquisition was carried out through a standard transfer of ownership and deeding process, with the purchase price being \$1.00. Prior to that purchase, the property was owned by 261 Main Street, LLC.
5. **Basic Site Information:** The property is referred to as Prince’s Garage, and the address is 261 Main Street, Somersworth, New Hampshire, 03878
6. **Status and History of Contamination at the Site:**
 - a) The site is contaminated with hazardous materials, with no known petroleum products.
 - b) The Site is comprised of a 0.737-acre lot identified on Somersworth with one 2,400 square foot commercial building with a slab-on-grade foundation. The Site has been developed and utilized as a family-owned gasoline and services station since circa 1920. The Site was purchased by the Prince family in 1947 and operation continued under family ownership until 2015 when business operation ceased and the property was foreclosed by PNF Realty, Inc. the mortgage note holder. Currently, the Site is vacant and unutilized. Three gasoline underground storage tanks (USTs) installed in 1968 at the property were emptied of product in 1980 and closed by removal in 1988. Assessment of subsurface conditions during the closure indicated the presence of petroleum contamination from historical gasoline releases.
 - c) Recognized Environmental Concerns have been identified in Phase 1 and 2 reports generated between 2020 and 2022, and the 2022 Targeted Brownfields Assessment / Remedial Action Plan report. The contamination is linked to buried industrial waste, buried materials, and dumped liquids into the soils and groundwater, and buried metals, and hazardous building materials.
 - d) Three gasoline underground storage tanks (USTs) installed in 1968 at the property were closed in 1988. Assessment of subsurface conditions during the closure indicated the presence of petroleum contamination from historical gasoline releases.
 - e) The contaminations occurred between 1968- 1988. The contaminants include: buried solid and dumped waste; presence of heavy metals (arsenic, barium, and lead), total

petroleum hydrocarbons (TPH), and polycyclic aromatic hydrocarbons (PAHs) at concentrations exceeding applicable standards.

7. **Brownfields Site Definition:** The subject property, with known and unknown environmental hazardous is considered a Brownfields site as defined in CERCLA section 101(39) as real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substances, pollutants, contaminants, controlled substances, petroleum, or petroleum products, or is mine-scarred land. Further, the City affirms that the property is a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. Government.
 8. **Environmental Assessment Required for Cleanup Grant Applications:** The site was the subject of a Phase I and a Phase II report performed in 2022. Further, the site was the subject of a Targeted Brownfields Assessment [TBA] and Remedial Action Plan [RAP] issued February 2022. [Remedial Action Contract No NHDEAS Site No. 198808013; Project Number 39526.] The report detailed the procedures and protocols for the soil and groundwater sampling and analysis work. The findings from this sampling work were integrated into the discussion of the 3 alternatives and helped to define Alternative 3 [full remediation] as the appropriate approach. The Assessment report and the RAP were discussed in a noticed public meeting. This document constitutes an equivalent to an Analysis of Brownfield Clean up Alternatives [ABCA]. The TBA report and the associated Remedial Action Plan were submitted to NH Department of Environmental Services and the regional EPA office.
 9. **Site Characterization:** Based on all available information, the City of Somersworth affirms that there is a sufficient level of site characterization from the environmental site assessment performed to date for the remediation work to begin on the site.
 10. **Enforcement or Other Actions:** The City of Somersworth finds that there are no known ongoing or anticipated environmental enforcement of any other action related to the site for which Brownfields Grant funding is sought.
 11. **Sites Requiring a Property-Specific Determination:** Based on a review of the document titled, "Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k), the City of Somersworth affirms that the site does not need a Property-Specific Determination.
 12. **Threshold Criteria Related to CERCLA / Petroleum Liability:** The City of Somersworth's response to this criteria relate to the fact that the site is contaminated with hazardous substances.
- Section 12.a: **Property Ownership Eligibility – Hazardous Substance Sites:** The City is not exempt from CERCLA liability since the acquisition did not meet the specified circumstances.

The project does not qualify for funding, since the property was not acquired prior to January 11, 2002. The City does affirm, as outlined below, that the project is eligible for a Brownfields Grant since it meets the requirements for asserting an affirmative defense to CERCLA liability through one of the landowner liability protections, as outlined below.

Section 12.iii (1) **Bona Fide Prospective Purchaser Liability Protection** applies to the circumstances presented by the City of Somersworth. The City claims that it satisfies the liability requirement to qualify as a Bona Fide Prospective Purchaser [BFPP]. This claim is supported by the following responses:

12.iii (1) (a): **Information of the Property Acquisition:**

(i – v) The City acquired the property through a negotiated purchase from a private individual. The date of the deed was March 27, 2023. The City owns the property through a fee simple purchase. There are no co-owners of the property. The property was purchased from the 261 Main Street, LLC, with an ownership address of 98 Fairview Ave Portsmouth, NH 03801.

The City had no familial, contractual, corporate, or financial relationships or affiliations with the seller, or with any previous owner or operator, of the property.

12.iii (1) (b): **Pre-Purchase Inquiry:**

(i) Prior to the purchase of the Property, a Phase II assessment was prepared. The report was prepared by the Nobis Engineering Group and was dated September 13, 2022. The City ordered the assessment with the Strafford Regional Planning Commission Brownfields Assessment and the City was the sole client for the work performed.

(ii) The Phase I assessment was prepared by Nobis Engineering, out of their office in Concord NH. The work was overseen by Clarence “Tim” Andrews, P.G., Senior Project Manager of Nobis Engineering. Mr. Andrews was also the Senior Project Manager of the Targeted Brownfield Assessment for the subject property; that amendment was issued October 7, 2022.

(iii) The Phase I assessment was prepared within 180 days of the deed of the property to the City.

12.iii (1) (c): **Timing and/or Contributions Toward Hazardous Substances Disposal:**

As is outlined in the Targeted Brownfields Assessment report, three gasoline underground storage tanks (USTs) installed in 1968 at the property were emptied of product in 1980 and closed by removal in 1988. Assessment of subsurface conditions during the closure indicated the presence of petroleum contamination from historical gasoline releases.

The City has not encouraged, participated in, contributed to, or ordered the disposal of any contaminants on the site. The City Affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

12.iii (1)(d): **Post-Acquisition Uses:**

There are no substantive uses being conducted on the property since the City purchased the site on March, 27, 2023. Prior to the purchase by the City, the former owner, 261 Main Street, LLC agreed to put fencing to secure the site with chain link fencing per the Remedial Alternative #1 fencing and signage.

12.iii (1) (e): **Continuing Obligations:**

- (i) Since the property was acquired by the City, it has taken measures to stop any suspected releases of any additional hazardous materials or substances. The site has restricted access with fencing around the entire perimeter. The City of Somersworth has no intent to allow anyone to use the property, in such a manner, as to cause any additional contamination or releases of any hazardous materials. The Somersworth Police Department makes regular trips to 261 Main Street to ensure public safety, and performs regular visual inspections of the property as well.
- (ii) As noted above, the City Police regularly patrols the area and keeps an eye out for overall public safety. Additionally, the Somersworth Department of Public Works team makes regular visits to the property.
- (iii) One key step in preventing or limiting exposure to any previously released hazardous substance will be through the pursuit of grant funds to remediate the property.

The City of Somersworth Affirms and Confirms their commitment to the following requirements:

- (i) The City will comply with any land use restrictions and will not impede the effectiveness or integrity of any institutional controls;
- (ii) The City will assist and cooperate with those performing the cleanup and provide access to the subject property. It is the goal and intent of the City that it will be the entity initiating and performing all cleanup work and remediation of the property.
- (iii) The City will comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and,
- (iv) The City will provide all legally required notices, especially those associated with the cleanup of the property.

13. Cleanup Authority and Oversight Structure:

- a. The oversight work will be managed by the environmental engineering firm hired by the City of Somersworth, through it's codified procurement process. The City and the Selected firm will comply with the State of New Hampshire Code of Administrative Rules [Env-OR-660] and will coordinate work with the NH Department of Environmental Services. The selected firm will perform daily, or as needed, inspections to ensure the protection of public health and safety. The firm performing tasks, such as excavation /trucking, soils movement and management, and related construction-type work, will have to provide a work plan that document how they, and their work, will provide appropriate safeguards.
- b. The City has already been working with that property owner on a variety of permits, approvals, and some public/private partnerships, as the plan for remediation work is prepared.

14. Community Notification

- a. **Draft Analysis of Brownfield Cleanup Alternatives:** As noted above in item 8, the Targeted Brownfield Assessment, and the Remedial Action Plan, function as an equivalent assessment document. Critical excerpts from this document [hundreds of data tables were excluded] were made available to the public for review and comment. A copy of these critical excerpts is attached to this application.
- b. **Community Notification Ad:** A copy of the ad is attached. Also attached is the notice that was placed on the City website [Somersworthnh.gov]. The ad includes all the required information related to the availability and location of the assessment document, comment period, and the time / date / location of the meeting.

- c. **Public Meeting:** Attached are all the required documents associated with the public meeting, held on Tuesday ,October 31, 2023. The Public Comment period ended November 10, 2023 and no comments were received. The document package includes: summary of public comments, and the City’s response to the comments; summary of the public meeting; and the sign-in / participant sheet.
 - d. **Submission of Community Notification Documents:** All of the required documents, as detailed in Section III.B.14.d, are attached to this outline of the Threshold Criteria document.
- 15. Contractors and Named Subrecipients:** This item is Not Applicable, as the City of Somersworth has not procured a contractor or any subrecipient.