

Community Relations Plan Former Brookfield Mill Site

59-67 Mill Street
Brookfield, MA
RTN 2-10354

Town of Brookfield, Massachusetts

October 2011



317 Iron Horse Way
Suite 204
Providence, RI, 02908



FUSS & O'NEILL
Disciplines to Deliver

October 21, 2011

Ms. Jerry Minor-Gordon
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OSRR07-2
Boston, MA 02109-3912

RE: Community Relations Plan
Former Brookfield Mill Site
59-67 Mill Street
Brookfield, Massachusetts

Dear Ms Minor-Gordon:

On behalf of the Town of Brookfield, we are pleased to present the enclosed Community Relations Plan for the above-referenced site. The Community Relations Plan documented herein has been developed to present a framework to notify the public and solicit public involvement during the cleanup of the former Brookfield Mill Property.

Please contact us if you require additional information, or if you have any questions.

Sincerely,

Daniel C. LaFrance
Project Engineer

David JP Foss, CPG, LSP
Senior Project Manager

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Attachment: Community Relations Plan

C: Ms. Donna Neylon, Town of Brookfield

Connecticut
Massachusetts
New York
Rhode Island
South Carolina

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Community Relations Plan Town of Brookfield

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1 Introduction

In April 2010, the Town of Brookfield, Massachusetts (Town) was selected for a \$200,000 Brownfields Cleanup Grant by the United States Environmental Protection Agency (USEPA) for the cleanup of the former Brookfield Mill site at 59-67 Mill Street. In accordance with the Cooperative Agreement between the Town and USEPA, the Town is required to prepare a *Community Relations Plan (CRP)* that outlines the Town's plan for involving the public during the cleanup process.

The purpose of this *CRP* is to identify the communication strategies that will address the needs and concerns of the citizens of the Town, particularly the residents of the Town who live in close proximity to the site. This *CRP* describes how the Town has involved and will continue to involve Town Officials, residents, nearby business owners, and local organizations in the decision-making process regarding the environmental remediation efforts at the site.

Active residents and institutions in the community are essential resources for the success of the *CRP*. The Town perceives these citizens and organizations as key stakeholders and points of contact and communication. One measure of success of the environmental remediation will be the involvement of well-informed citizens in the remediation process.

2 Spokesperson and Information Repository

The spokesperson for this project is Ms. Donna Neylon, Assistant to the Board of Selectmen, who may be contacted at:

Brookfield Town Hall
6 Central Street
Brookfield, MA 01506
508-867-2930 ext. 10
dneylon@brookfieldma.us

The Information Repository will be located in the Selectmen's office, located at the above address. Select documents prepared as part of this project will be available in the Information Repository. To conduct a review of the Information Repository, Ms. Neylon should be contacted to make an appointment during normal Municipal Building business hours:

Monday & Tuesday: 9 AM to 5 PM
Wednesday: 9 AM to 8 PM
Thursday: 9 AM to 3 PM

3 Site Description

3.1 Site Location

The subject property, the former Brookfield Mill, is located at 59-67 Mill Street and consists of one rectangular-shaped, 0.667-acre parcel identified as Town Tax Assessor's Map 6C, Block 2, Lot 105. Between 1893 and 2000, the Brookfield Mill, a four-story wooden building, occupied the subject site. In August 2000, the building burned to the ground and was razed into its foundation.

The subject property is bordered to the north by the Town Highway Department Garage, to the south by a railroad operated by CSX and undeveloped wetlands, to the west by the intersection of Mill Street, River Street, and Fiskdale Road, and to the east by another mill complex. The subject property is currently undeveloped. At surface grade, there is visible evidence of the building foundation of the former Brookfield Mill.

The "disposal site" encompasses the majority of the subject property within the former building footprint. The disposal site includes the areas of the subject property where hazardous materials and physical hazards have come to be as a result of releases at the subject site. The disposal site includes soil that contains hazardous materials as the result of the release documented by Release Tracking Number (RTN) 2-10354.

3.2 History of Site Use and Ownership

The Town acquired the subject property in 2003 and is the current property owner. The former Brookfield Mill occupied the site from 1893 until August 2000, when it was destroyed by fire. Businesses that operated in the former mill building included a paper-coating company, a shoe manufacturer, a plastic molding business, and a charcoal filter manufacturer, among other small businesses. Following the August 2000 fire, the building remnants were either razed or collapsed and were used to fill the building basement (Town of Brookfield, 2011).

The site has remained vacant following the fire. The Town intends to redevelop the site as a public park with access to the nearby Quaboag River.

3.3 Nature of Threat to Public Health and the Environment

The following environmental investigations have been conducted at the site:

- *Phase I Limited Site Investigation* by Lycott Environmental Research, Inc.; August 1991
- *Targeted Brownfield Assessment* by Metcalf & Eddy, Inc. (M&E); November 2002
- *Phase I Initial Site Investigation* by M&E in January 2004
- *Phase II Comprehensive Site Assessment Report* by M&E in November 2007

- *Targeted Brownfield Assessment and Phase III Remedial Action Plan* completed by Advanced Environmental Solutions, Inc. (AES) and AECOM Environment (AECOM) in March 2009
- *Release Abatement Measure (RAM) Plan* by Fuss & O'Neill in September 2011

The subject property has been regulated by the Massachusetts Department of Environmental (MassDEP) Bureau of Waste Site Cleanup (BWSC) since March 1995, when RTN 2-10354 was assigned based on conditions identified during the August 1991 *Phase I Limited Site Investigation*. A second RTN (2-14601) was assigned following identification of 120-day Reportable Condition at the subject property during the 2002 *Targeted Brownfield Assessment*. The second RTN was later linked to the original and is currently classified by MassDEP as closed (AES and AECOM, 2009).

The above-referenced investigations documented the presence of solid waste and hazardous materials in soil at the subject property which warrant remediation under the Massachusetts Contingency Plan (MCP; 310 CMR 40.0000) to achieve a condition of No Significant Risk to future users of the property and permanent solution in accordance with the MCP.

The hazardous materials identified in soil at the property generally consisted of metals, polycyclic aromatic hydrocarbons (PAH), and polychlorinated biphenyls (PCBs), which were attributed to the building debris and ash associated with the August 2000 fire. The horizontal extent of the disposal site was generally limited to the former building foundation. The vertical extent of the disposal site was estimated to coincide with the depth of fill and disturbed soil associated within the former building foundation hole, which reportedly extended to between 5 and 10 feet below grade. In addition to soil containing hazardous materials, solid waste, including glass, rusted metal, wood, and wire, and unstable ground slopes were identified as potential safety hazards at the site (AES and AECOM, 2009).

Based on the results of the previous environmental investigations, remedial actions are warranted at the subject property to achieve a permanent solution and bring the site into compliance with the MCP. The primary remedial objectives documented in the March 2009 *Targeted Brownfield Assessment and Phase III Remedial Action Plan* and September 2011 *RAM Plan* were to:

- mitigate the potential for direct exposure to soil and solid waste by property users at the disposal site
- remove unstable slopes at the disposal site

To achieve these remedial objectives, construction of an engineered barrier (a remediation cap) coupled with implementation of an *Activity and Usage Limitation* (AUL) to ensure proper maintenance of the cap, was selected as the most feasible remedial alternative for the disposal site. Though this alternative will not result in establishment of background conditions for the disposal site, it is anticipated to achieve a condition of No Significant Risk and permanent solution in accordance with the MCP.

Fuss & O'Neill, on behalf of the Town, will coordinate, design, and oversee implementation of the selected remedial alternative. The remedial response action will be implemented using funding awarded to the Town by the USEPA Brownfield Program.

4 Community Background

4.1 Community Profile

The Town of Brookfield is a small rural town located approximately 20 miles west of Worcester in central Massachusetts. In 2000, the Census indicated that the town population was 3,051. Of 351 communities in Massachusetts, Brookfield ranks in the bottom third for the following economic indicators:

- Per capita income: 301st
- Median household income: 269th
- Median family income: 266th
- Equalized valuation per capita: 328th
- Average parcel value: 285th

Between 2006 and 2009, the Town's unemployment rate consistently exceeded the aggregate unemployment rate in Massachusetts. The Town's employment base is limited, and only 4.3% of the Town tax base was comprised of commercial and industrial property in 2009. In 2007, the Massachusetts Department of Employment and Training reported that only 463 jobs existed in the Town.

The Town intends to take advantage of its Brownfields revitalization opportunity to provide public access to the nearby Quaboag River. Development of this waterfront access is anticipated to invite increased recreational use of the river, including fishing, canoeing and kayaking. This effort, in concert with a Town Center Revitalization Program in progress, is intended to promote investment in the community and reverse the appearance of blight and neglect.

4.2 Chronology of Community Involvement

To date, efforts to involve the community in the cleanup planning for the site have consisted of the following:

- September 20-25, 2009: The Town placed legal advertisements in the Worcester Telegram & Gazette and Quaboag Current (local newspapers) announcing a public meeting, to be conducted October 6, 2009, to discuss the Town's pending grant application.

- October 6, 2009: Mr. William Scanlan, the Town's Grant Writer, presented the application for the USEPA Brownfields cooperative agreement. Comments were received from the general public.
- April 20, 2010: The Town announced the awarding of the USEPA Brownfields Cleanup Grant for the site at a regularly scheduled Board of Selectmen's meeting that was open to the public.
- November 30, 2010; December 14, 2010; May 31, 2011: The Board of Selectmen discussed the site, and the proposed formation of the Brownfield Steering Committee to oversee the remediation project on behalf of the Town, during a regularly scheduled Board of Selectmen's meeting that was open to the public.
- July 26, 2011: The Board of Selectmen discussed the site and established the Brownfield Steering Committee during a regularly scheduled Board of Selectmen's meeting that was open to the public.
- August 30, 2011: The Board of Selectmen discussed the site, the evaluation of LSP firms, and the selection of Fuss & O'Neill as the LSP Firm to oversee the project during a regularly scheduled Board of Selectmen's meeting that was open to the public.

Additionally, the Town has completed public notice requirements in accordance with the MCP (310 CMR 40.1400) at the appropriate milestones, including the filing of Phase submittals.

4.3 Key Community Concerns

Concerns expressed by local residents during and following the October 2009 public meeting included traffic-related concerns. The site is located in close proximity to Route 148, a heavily-travelled state road. The community concerns included the lack of sidewalks along Mill Street and at the Route 148 crossing over the railway, both of which would see an increase in pedestrian traffic as a result of recreational development at the site.

The Town will continue to seek public input on concerns specific to the site throughout the cleanup process.

4.4 Benefit to Targeted Community

The intended reuse of the site includes development of a public park area, proximal to riverfront access along the Quaboag River. This redevelopment would encourage recreational use of the area, with the goal of attracting boaters and anglers. Additionally, improvements to the site would improve the aesthetics of the site and its surroundings. The Town believes that improvements to the site and its surroundings would foster a sense of pride in the area and promote investment in the community.

Additionally, redevelopment of the site would benefit the Town financially and remove a potential safety hazard at the site in the form of exposed debris and potentially unstable slopes.

5 Continued Community Involvement

In order to solicit public comments on the approach to remediation, a clear understanding of the site background, the existing health and environmental risks, and need for response actions will be provided. Summaries of data and applicable MassDEP and USEPA regulations will be presented for review. An *Analysis of Brownfields Cleanup Alternatives (ABCA)* will be developed to evaluate remedial approaches to environmental conditions at the subject site. The alternatives will be evaluated with details relating to cost and public benefit, among other criteria. In September 2011, the Town will add these materials to the Information Repository and announce a public meeting to present the *ABCA* and solicit public comment. The Town shall place a display advertisement in Quaboag Current with a link on the Town's "Ongoing Events" web page announcing the following:

- A public meeting about the project will be held on November 8, 2011 at 7:15 PM in the Banquet Room at the Brookfield Town Hall, at 6 Central Street in Brookfield.
- The availability of documents regarding the evaluation of cleanup alternatives.
- The availability of the Information Repository for this project, including this *CRP* and environmental assessments, at the Selectmen's Office at the Brookfield Town Hall, for viewing during normal business hours.
- The availability of the Information Repository online, via <http://www.brookfieldma.us/> under the "Town Documents" section, listed under "Brookfield Brownfields Project Documents."

In addition to the display advertisement in the local newspaper, a copy of the display advertisement will be posted at Municipal Building, the Town Library, on the Town website, and other locations typically used by the Town for this purpose. In the Town's experience to date, no particular issues with non-English speaking residents or the hearing impaired have been identified at previous public meetings. However, if requested, the Town will accommodate these residents.

The advertisement will announce the start of a 30-day comment period on the cleanup plan. The Town will accept comments on the cleanup plan during the comment period and, if warranted, will provide written responses that will become a part of the administrative record. Anyone wishing to comment is strongly urged to submit written comments. However, the Town will consider all comments it receives. Comments may be submitted at the meeting or in writing, to the following addresses:

- Mail: Ms. Donna Neylon, Assistant to the Selectmen, Brookfield Town Hall, 6 Central Street, Brookfield, 01506.

- Electronically: dneylon@brookfieldma.us

The Information Repository will be updated with the inclusion of meeting minutes, progress reports, and other communications as they are generated. Information will be specific as it relates to meeting both State and Federal requirements. Upon completion of the 30-day comment period, the Town shall prepare a final *ABCA* that will respond to comments received during the comment period and provide the final analysis of cleanup alternatives. The report will be completed within 60 days of the end of the comment period and will be available in the Information Repository.

When applicable, the Town will communicate project progress status updates to the community through the distribution of progress summaries that will be e-mailed to appropriate personnel and available in the Information Repository. If warranted, project progress will also be reported by the Town's consultant to the Board of Selectmen at public meetings or through press releases to the local media. The Town's consultant responsible for providing technical oversight of the project will work with the Town to ensure that the technical information disseminated through these means is complete and accurate.

Upon completion of the cleanup actions, the Town shall prepare a *Release Abatement Measure (RAM) Completion Report* for submission to MassDEP describing the activities conducted to clean up the site and the final outcome, or additional activities required at the site and a proposed schedule for completion of those activities.

6 Proposed Project Schedule

After the completion of project steps with deliverables, the Information Repository will be updated. The tentative project schedule includes the following steps:

- September 2011 – Complete *RAM Plan* and submit to MassDEP.
- October 2011 – Prepare and submit *CRP* to USEPA for review and approval.
- October 2011 – Town schedules public meeting to present draft *ABCA* and solicit comments. Display advertisement is published in newspaper, marking the beginning of a 30-day public comment period.
- November 8, 2011 – Town holds public meeting to present the plan and solicit comments.
- November 2011 – 30-day Public comment period ends. Respond to public comments on remediation strategy and finalize *ABCA*.
- January 2012 – Complete remediation specifications, and bid documents. Issue notification of public invitation to bid.

- March 2012 – Pre-bid meeting, contractor bids submitted, and bid award. Prepare *Quality Assurance Project Plan (QAPP)* for USEPA comment and approval, if necessary.
- March to May 2012 – Complete site cleanup activities.
- May to June 2012 – *RAM Completion Report* and *Response Action Outcome* Statement, if warranted
- Following RAM Completion submission – Closeout grant