

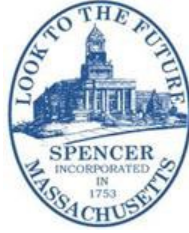
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**TOWN OF SPENCER, MASSACHUSETTS
FY 24 EPA BROWNFIELD CLEANUP GRANT
APPLICATION**

October, 2023

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**Narrative Information Sheet
U.S. EPA Brownfield Cleanup Grant Application**

1. Applicant Identification

Town of Spencer, 157 Main Street, Spencer MA 01562

2. Funding Requested

- a. Grant Type: Single Site Cleanup.
- b. Federal Funds Requested
- c. Amount requested: \$500,000.

3. Location

The Site is in the Town of Spencer, Worcester County, Massachusetts.

4. Property Information

The Site is the Former Lake Street Elementary School, 17 Lake Street, Spencer Massachusetts 01562-2123.

5. Contacts

a. Project Director

Name: Jeffrey K. Bridges, Jr. Town Administrator.
Address: 157 Main Street, Spencer MA 01562-2123.
Phone: 508-885-7500, ext. 132.
Email: JBridges@SpencerMA.gov

b. Chief Executive/Highest Ranking Elected Official

Chief Administrator Officer: Jeffrey K. Bridges, Jr.
Phone Number: 508-885-7500, ext. 132.
Email: JBridges@SpencerMA.gov
Mailing Address: 157 Main Street
Spencer, MA 01562-2123

| | |
|-------------------------|---|
| Chief Elected Official: | John Howard, Chairman Spencer Board of Selectmen 508-885-7500 |
| Phone Number: | 508-885-7500 |
| Email: | JHoward@SpencerMA.gov |
| Mailing Address: | 157 Main Street Spencer, MA 01562-2123 |

Jeffrey K. Bridges, Jr. is the primary contact on the grant.

6. Population

The population of the Town of Spencer is 11,911 as of July 1, 2022, according to the U.S. Census Bureau.

7. Other Factors Checklist

| Other Factors | Page # |
|--|---------------|
| Community Population is 10,000 or less | NA |
| The applicant is, or will assist, a federally recognized Indian tribe or United States territory. | NA |
| The proposed brownfield site(s) is impacted by mine-scarred land | NA |
| 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. | TBD |
| 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). | TBD |
| The proposed site(s) is in a federally designated flood plain. | NA |
| The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | TBD |
| The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures. | TBD |
| The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments. | TBD |
| The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing. | NA |

8. Releasing Copies of Applications

There is no restrictions on the release of this complete application.

FY24 EPA Cleanup Grant Application

Threshold Criteria

1. Applicant Eligibility

The Town of Spencer, Massachusetts is eligible as a Town of the Commonwealth of Massachusetts, a local government entity. This affirms that the Town of Spencer is eligible for funding.

2. Previously Awarded Cleanup Grants

The Town of Spencer, Massachusetts has not received a prior EPA Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The Town of Spencer, Massachusetts does not have an open 14 EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Town of Spencer, Massachusetts is the current owner of the Site. The deeds are attached as Exhibit A.

5. Basic Site Information

The name of the Site is the Former Lake Street Elementary School, located at 17 Lake Street, Spencer, MA 10562-2123. The Town of Spencer, Massachusetts is the owner of the property.

6. Status and History of Contamination at Site

The Site is contaminated with hazardous building materials including asbestos, lead, mercury, and PCB's in the lighting and fixtures. The Site was used as an elementary school from its construction in 1956 to its closure in 2015. The Site is approximately 50,000 square feet. The Site became contaminated by the use of the building materials standard for school construction at the time of construction. The extent of the contamination is in the asbestos containing materials, mercury, lead paint, and PCB's in the lighting and fixtures.

7. Brownfield Site Definition

The Town of Spencer affirms that the Site is not listed or proposed for listing on the National Priorities List; 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 not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Application

A Hazardous Materials Survey was conducted on the Site by Partner Engineering and Science, Inc., in July of 2023.

9. Site Characterization

The Site is not eligible for enrollment in a voluntary response program due to the Site contamination composition of building materials. A letter from David Foss of the Massachusetts Department of Environmental Protection for the required confirmation.

10. Enforcement or Other Actions

There are currently, nor anticipated, enforcement actions on the Site.

11. Sites Requiring a Property-Specific Determination

This Site does not require a property-specific determination.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

- a. This Site is exempt from CERCLA liability due to the CERLCA Asbestos Exclusion. No
- b. The property is publicly owned prior to January 11, 2002.

13. Cleanup Authority and Oversight Structure

- a. The cleanup of the Site will be overseen by a Massachusetts Licensed Hazardous Waste Cleanup Professional. The Site will not be enrolled in a state response program. Competitive purchasing requirements will be overseen by the Project Manager.
- b. There are no impacts to adjacent properties anticipated by the cleanup of the Site. Access to the Site is provided by public street and public property.

14. Community Notification

A notice of the intent to apply for the FY 24 EPA Cleanup Grant for the Former Lake Street Elementary School was published in the October 23, 2023, edition of the Worcester Telegram and Telegram Gazzette newspaper. A public meeting has been scheduled for October 26, 2023, and the public comment period will run through November 10, 2023. Notice of the public meeting is included in the publish notice and online at www.SpencerMA.gov.

a. Draft Analysis of Brownfield Cleanup Alternatives

The Draft Analysis of Brownfield Cleanup Alternatives is attached at Exhibit B.

b. Community Notification Ad.

A notice of the intent to apply for the FY 24 EPA Cleanup Grant for the Former Lake Street Elementary School was published in the October 23, 2023, edition of the Worcester Telegram and Telegram Gazette newspaper.

c. Public Meeting

A public meeting on the FY24 EPA Cleanup Grant Application for the Former Lake Street School will be held on Thursday, October 26, 2023, at 7:00 PM at Spencer Town Hall. This meeting will be held in person and remotely.

d. Community Notification Documents

All community notification documents will be included with the final application.

15. Contractors and Subrecipients

No contractors and / or subrecipients have been selected for the project.

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EPA Cleanup Proposal Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

The Town of Spencer, incorporated in 1753 is a traditional New England Town. Population and growth occurred during the industrial revolution with significant textile industries and then again after World War II as a suburban community to the greater Worcester area. As a result, new elementary schools were developed in the 1950's to accommodate the education of the community's children. The Former Lake Street School opened in 1956 and remained an elementary school until 2015.

The target area for this EPA Cleanup Grant is the center of the Town of Spencer. The Former Lake Street School sits on a 24-acre parcel that is a mixture of the school site and open space adjacent to one of the Town's most significant parks, Luther Hill Park. The area is a combination of single-family homes, duplexes and triplexes, and housing for specific populations including the elderly, special needs, and low income.

The EPA Cleanup Grant will facilitate the redevelopment of the Site into potential mix of open space and new residential housing. A prior proposal with a residential developer to demolish the former school and building new affordable housing for seniors was agreed to but the developer succumbed to the financial impacts of the pandemic and the project did not take place.

By removal of the former school, the 24 acres can be laid out to accommodate new housing and open community space providing which the community needs both of.

ii. Description of the Priority Brownfield Site(s)

The Site is the Former Lake Street Elementary School opened in 1956 and operated as an elementary school until 2015. The building is approximately 50,000 square feet. The Site sits on a 24 acre parcel adjacent to Luther Hill Park, which includes lake front for swimming and water activities. When in operation the school utilized approximately 10 acres of the total site. The remainder of the site was open space.

The cleanup of the former school is in preparation for the demolition of the structure which will lead to redevelopment of the site. Open space will be the immediate use of the 24 acres, however a former proposal for multifamily housing on the site lends itself to utilization by both open / recreation space and new residential housing.

The removal of a 10,000-gallon underground fuel tank was undertaken several years ago under the supervision of licensed personnel. There is no residual fuel contamination on the Site.

A Hazardous Materials Survey conducted on the former school in the summer of 2023 identified the following building material containments: asbestos, lead, mercury, and PCBs in the lighting and fixtures.

The building is vacant, however, and has become an attractive nuisance to the area with people gaining entrance by breaking windows or through boarded up accesses. By removing the hazardous materials and the rest of the building, the potential for the public to encounter these substances is eliminated and they are disposed of properly.

The Site is currently zoned Village Residential which allows for single and two-family housing by right and multifamily housing by special permit of the Zoning Board of Appeals.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Massachusetts General Law 40B requires communities in Massachusetts to have 10% of their housing stock available as affordable which is attainable for a household making no more than 80% of the area median income. The Town of Spencer currently has 5.67% of its housing stock available as affordable. The 2023 Town of Spencer Housing Production Plan has identified the former Lake Street School site as a potential site for additional affordable housing.

The site lends itself to this use in several ways. It is a 24-acre site that would allow for both recreation use and a portion of the site for new housing. The site is served by public water and sewer, it is close to the downtown area where there is shopping and services, and public transportation is available by the Worcester Regional Transit Authority.

A proposal to use a portion of the site for housing was proposed prior to the pandemic but did not survive due to the financial impacts of the pandemic. The proposal at the time was for housing for low to moderate income seniors. The Town of Spencer current population is currently 20% age 65 and above. Addition affordable housing opportunities is critical for these residents to stay in the community.

ii. Outcomes and Benefits of the Reuse Strategy

Currently, the former school is boarded up and is subject to consistent intrusion. Removal of the building will eliminate these instances and provides a clean slate to reutilize the 24 acres. Additional housing with a significant portion of the property reserved as open / recreation space would be a boon to the now very heavily developed downtown area.

The former school has recreation fields for organized sports facilities such as baseball fields. Removal of the building a new master plan for the property could include additional community recreation spaces as well as open / passive recreation uses.

Any reuse of the property would include the most current energy systems which could include solar, energy efficient heating and cooling systems, and building materials in accordance with the Massachusetts Stretch Energy Building Codes.

c. Strategy for Leveraging Resource

i. Resources Needed for Site Characterization

The Town does not feel further characterization for the remediation. A full hazardous materials survey was conducted and a bid process in accordance with Massachusetts purchasing laws took place in the summer of 2023. Unfortunately, due to the amount of hazardous materials to be remediated, the cost of the project exceeded the Town’s available project budget. However, the Town does have additional project funds available for any additional site characterization through the funds provided in the original project budget for demolition.

ii. Resources Needed for Site Remediation

The FY24 EPA Cleanup Grant funds requested (\$500,000) will be sufficient to effectuate the remediation. The Town has \$700,000 available for the demolition and disposal of the rest of the building. The Town’s source of funds is the COVID-19 Federal State and Local Fiscal Recovery Funds.

iii. Resources Needed for Site Reuse

| Name of Resource | Is the Resource for (1.c.i.) Assessment, (1.c.ii.) Remediation, or (1.c.iii.) Reuse Activities | Is the Resource Secured or Unsecured? | Additional Details or Information About the Resource |
|------------------|--|---------------------------------------|--|
| Town of Spencer | Demolition | Secured | Federal SLFRF Funds |
| | | | |
| | | | |

iv. Use of Existing Infrastructure

The Site is served by water, sewer, storm sewer, and paved streets. In addition, public transportation is available by the Worcester Regional Transit Authority.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

The Town allocated \$700,000 of its Covid-19 State and Local Fiscal Recovery Funds to the demolition of the Former Lake Street Elementary School. However, the bids for the project which included the remediation were well over \$1,000,000 with an additional estimate of \$46,000.00 for the LSP services to monitor the project. This grant is necessary for the remediation of the Site to facilitate the demolition of the remaining structure and thus provide for the ability of the resue of the site.

Local governments in Massachusetts are limited in their ability to raise funds through taxation by Proposition 2.5. Without the support of grants such as the FY24 EPA Brownfield Cleanup Grant, the cleanup of this property would be financially out of reach.

ii. Threats to sensitive populations

This information will be included in the application. Information is in development and public comment may add additional information.

(1) Health or Welfare of Sensitive Populations

See comment above.

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

See comment above.

(3) Promoting Environmental Justice

a. Identification of Environmental Justice Issues

See comment above.

b. Advancing Environmental Justice

See comment above.

b. Community Engagement

Our key stakeholders outlined in the table below will be engaged in providing input and facilitating communication with respect to cleanup and redevelopment of the Site:

i. Project Involvement & ii Project Roles

| Name of Organization/Entity/Group | Point of Contact (name, email & phone) | Specific Involvement in the Project or Assistance Provided |
|--|---|---|
| Spencer Board of Selectmen | Jeff Bridges, Town Administrator Jbridges@SpencerMA.Gov | Owner of the Site. Will be responsible for developing and approval of any use plan, also for solicitation of community input. Provide funds for demolition. |
| Spencer Planning Board | Lauren Vivier, Town Planner, Conservation Agent. Lvivier@SpencerMA.gov | Review possible reuse plan and permitting. Hold public hearings on proposed reuses. |
| Spencer Zoning Board of Appeals | Lauren Vivier, Town Planner, Conservation Agent. Lvivier@SpencerMA.gov | Review and permitting of possible reuses. Hold public hearings on proposed reuses. |
| Spencer Parks and Recreation Commission | Jeff Bridges, Town Administrator. | Work with community on potential open / recreational space needs. |

iii. Incorporating Community Input

Community outreach will be performed through postings on the Town’s website; local newspaper articles, and notices on the Community Cable Chanel hosted by Spencer Cable Access. Redevelopment plans will be made available on the Town’s website and hard copies will be available at the Town Administrator’s Office and the Spencer Sugden Public Library.

A public meeting on the grant application is scheduled for Thursday, October 26, 2023, at the Spencer Town Hall, 157 Main Street Spencer and it accessible in person or remotely.

The public input period on the grant application is through November 10, 2023.

Proposed redevelopment discussions with Boards and Committees will also be accessible to the public in person and by remote means. Viewing the meetings is possible on Spencer Cable Access.

Input will be received by the Officer, Board or Committee engaged in the project at the time. Answers to questions would be done by the appropriate board and committee. A Questions and Answers page will be established on the Town’s website as the project begins.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The proposed cleanup activities to remediate the Site is outlined in the Alternative #3 the ABCA. Based upon the findings of the hazardous materials survey, there is a substantial concentration of hazardous materials at the Site including asbestos, lead, mercury, and PCB’s in the lighting and fixtures. A licensed Site Professional will oversee the remediation of the Site. The bid package for the remediation / demolition will require the bidders to provide the necessary permits and disposal plan for the hazardous materials. Once the hazardous materials are disposed of, the remainder of the building will be demolished and properly disposed of.

For the redevelopment of the site, the Former School must be removed to make the most efficient use of the site for housing and / or open space / recreation.

b. Description of Tasks/Activities and Outputs

| |
|--|
| Task/Activity 1: Program Management |
| i. Project Implementation: <i>EPA-funded tasks/activities:</i> Non-EPA grant resources: Town Staff will solicit proposals for a Licensed Site Professional to oversee the remediation of the Site. The bid package will be developed input from the Licensed Site Professional. |
| ii. Anticipated Project Schedule: 1-3 months |

| |
|---|
| iii. Task/Activity Lead: Town Staff, Jeff Bridges, Town Administrator |
| iv. Outputs: Procurement of an LSP and development of a bid package for the project. |
| Task/Activity 2: Community Engagement |
| i. Project Implementation: A public meeting will held on Thursday, October 26, 2023 with a public comment period through November 10, 2023. The draft application will be posted online at www.SpencerMA.Gov and comments will be received to JBridges@SpencerMA.Gov through November 10, 2023. Once the project starts, continuous update through website notices and discussion at public meetings. |
| ii. Anticipated Project Schedule: 1-12 Months. Continuous community notification. |
| iii. Task/Activity Lead: Town Staff. |
| iv. Outputs: Information materials, newspaper articles, reports to boards and commissions. |
| Task/Activity 3: Cleanup Planning |
| i. Project Implementation: Development of the bid package and compliance with EPA Grant requirements. |
| ii. Anticipated Project Schedule: Months 3-9. |
| iii. Task/Activity Lead: Town Staff |
| iv. Outputs: Solicitation of bids for the remediation and demolition of the Site. |
| Task/Activity 4: (*Example: “Cleanup Activities and Reporting”) |
| i. Project Implementation: Select contractor for remediation and demolition of site. |
| ii. Anticipated Project Schedule: 6-13 months |
| iii. Task/Activity Lead: Town Staff / LSP |
| iv. Outputs: Complete remediation of Site with proper reporting for disposal and grant requirements. |

c. Cost Estimates

Sample Format for Budget (do not change Budget Categories)

| Budget Categories | Task 1 | Task 2 | Task 3 | Task 4 | Totals |
|--------------------------|---|---------------|---------------|---------------|------------------|
| Direct Costs | Personnel | | | | |
| | Fringe Benefits | | | | |
| | Travel | | | | |
| | Equipment | | | | |
| | Supplies | | | | |
| | Contractual | | \$50,000 | | \$ 50,000 |
| | Construction | \$450,000 | | | \$450,000 |
| | Other (meeting expenses, participant support cost, subawards) | | | | |
| | Total | | | | |

| | | | | | |
|---------------------------|----------------|---------------|--|--|----------------|
| Total Direct Costs | | | | | |
| Indirect Costs | | | | | |
| Total Budget | 450,000 | 50,000 | | | 500,000 |

| |
|--|
| Cost Breakdown |
| Task/Activity 1: Construction |
| Task 1 Activities include the remediation and disposal of the hazardous materials on the Site. |
| Task/Activity 2: Contractural |
| Task 2 is for contractual costs for project oversight. |

d. Plan to Measure and Evaluate Environmental Progress and Results

The outputs will be the removal and full remediation of the hazardous materials at the Site. The testing of the materials at disposal and transport to a licensed hazardous materials landfill will be the measures.

The outcomes will be measured by the completed remediation of the Site. The proper disposal at a licensed hazardous materials landfill and the certification of the rest of the Site as clean demolition will be the expected outcome.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure

The Town of Spencer will utilize Town Staff including Town Administrator, Jeff Bridges, to oversee the project. Procurement of licensed professionals in accordance with Massachusetts Purchasing Laws will be competed to select professionals with necessary expertise.

The Town’s Accounting Department will provide accounting of the grant funds and pay audited claims for payments. Certified payrolls for compliance with Davis / Bacon and prevailing wage requirements will be conducted by selected consultants.

Remediation activities will comply with all state, local, and federal laws and regulations.

ii. Description of Key Staff

The key staff are:

- Jeff Bridges, Town Administrator
- Susan Maliff, Town Accountant
- Pete Boria, Director of Utilities and Facilities.

iii. Acquiring Additional Resources

The Massachusetts Operational Services Division maintains a list of qualified professional professionals that can provide additional expertise if necessary.

The Commonwealth of Massachusetts requires the payment of prevailing wages which are consistent with best labor practices.

b. Past Performance and Accomplishments

The Town of Spencer has not received a prior EPA Cleanup Grant but has received other federal grants. However, the Town has received federal CARES Act Funds and COVID-19 State and Local Fiscal Recover Funds.

(1) Purpose and Accomplishments

The purpose of these grants was to respond to the public health and economic impacts of the COVID-19 Pandemic. Public Health professionals, contact tracing, and temporary accommodations for the continuity of services were part of the CARES Act Funds.

The COVID-19 State and Local Fiscal Recovery Funds are meant to offset the economic impacts to the community from the pandemic, this includes loss revenue to the local unit of government.

(2) Compliance with Grant Requirements

All grant requirements for the CARES Act Funding have been completed with reports filed.

The COVID-19 State and Local Fiscal Recovery Funds are ongoing. The two required reports have been filed and grant administration continues.

Analysis of Brownfields Cleanup Alternatives – Preliminary Evaluation Remediation and Demolition of the former Lake Street School, Spencer, MA.

Prepared by: Jeff Bridges, Town Administrator

1. Introduction & Background

a. Site Location: The site is located at 17 Lake Street in Spencer, Massachusetts (herein referred to as “the Site”).

b. Previous Site Uses and any previous and any previous cleanup / remediation.

The Site was an elementary school from the time of its construction in 1956, with an addition in 1977, to when it vacated by the School Committee in 2015.

A redeveloper proposed in 2020 to convert the building to affordable housing but the developer was not financially able to undertake the project.

A 10,000-gallon underground fuel tank was removed from the site in 2019. Cyn Environmental performed the removal and Allied Recycling took possession of the cleaned tank. There was no evidence of soil contamination at the site.

c. Site Assessment Findings:

A Hazardous Materials Survey was completed by Partner Engineering and Science, Inc in June of 2023 as part of the bid package for solicitation of bids for the demolition of the building. The survey found concentrations of asbestos (throughout the building,) lead based paint (in the original 1956 addition), mercury (bulbs and thermostats), and universal hazardous waste containing polychlorinated biphenyls (PCBs) (bulbs and fixtures).

As stated above, the underground fuel storage tank was removed and disposed of in 2019.

Although not identifying the specific presence of hazardous materials, the Town commissioned an Existing Building Analysis of the Site through Context Studios, Architects and Garcia, Galuska, Desousa, Consulting Engineers in the Spring of 2016. The conclusion of this study was:

“In the absence of an intended use by the Town or a potential large tenant, either of which will need to expend considerable monies to update the facility, it is the opinion of this office and its consultant’s that the building should be

decommissioned and possibly demolished”. (Context Studies, LLC, 22 March, 2016)

Finally, while the school was open in 2014, the Massachusetts Department of Public Health, Bureau of Environmental Health, Indoor Air Quality Program performed an Indoor Air Quality Assessment at the Lake Street School. A conclusion and recommendation were to replace the entire HVAC system. The school was subsequently closed the following year.

d. Project Goals

The Site is located on 23.4 acres of otherwise vacant land in the center of the Town of Spencer. This location has public water and sewer service, is close to the downtown shopping area, and is close to the Worcester Regional Transit Authority service stops along Rt. 9 in Spencer. It is also contiguous with the Town’s Luther Hill Park, which has lake front access on Lake Whittemore.

At the Annual Town Meeting in 2015, and reaffirmed at the Special Town Meeting in 2018, the Town Meeting authorized the Board of Selectmen to sell or lease the property.

The Spencer Board of Selectmen, after the School Committee turned the Lake Street Elementary School back over to the Town, tasked the Town’s Building Reuse Committee with determining what to do with the building. The Committee in 2018 decided to issue a Request for Proposal for a potential buyer / redeveloper of the site.

In 2019 the Town issued a Request for Proposal for the redevelopment of the former Lake Street School, making the building and ten of the 24+ acres available for a 99-year lease. The Town’s selected developer, the Women’s Institute Realty, Inc. was the successful responder.

As part of the project, the Town would subdivide the ten acres with the school on it and the Women’s Institute Realty, Inc would demolish the structure and replace it with 33 affordable housing units for seniors. Unfortunately, the Women’s Institute Realty, Inc. closed their doors during the COVID pandemic, and the project evaporated.

At the demise of the project, the Building Reuse Committee chose to demolish the building. In the summer of 2023, the Town solicited bids for demolition and the costs exceeded the available resources of the Town. The estimated project cost was \$700,00.00. The lowest responsible bid was \$1,059,000 with an additional cost of \$45,400 for an LSP to monitor and manage the demolition. The most significant cost factor in the demolition was the amount of hazardous materials to be abated and disposed of.

The current intended use of the site once the demolition of the Site is complete is to have it as open space. However, as was contemplated with the proposed affordable housing

project, with the overall size of the parcel, the ability to divide a portion of the land for housing, and provide significant open space is possible. With the building not obstructing the front of the parcel, a better overall land use plan can be developed to better arrange the relationship between the housing and the open space. This parcel is one of the last significant vacant areas of developable ground in the center of the Town of Spencer.

e. Regional Site Vulnerabilities

Increased unpredictable weather and this vacant building deteriorated, near a significant water body, long term makes the site vulnerable to release due to weather damage and structural failure. This site is at the top of the hill and any discharge or release would flow off the site into adjacent parcels and into storm water systems.

Moreover, the Site is subject to consistent vandalism and break ins. Removing the building and the hazardous materials eliminates an attractive nuisance building and the hazardous materials that come with it. Spencer Police and Fire Departments have responded many times to the site, entering the building and its current environment.

II. Applicable Regulations and Cleanup Standards

a. Cleanup oversight responsibilities.

The cleanup will be overseen by a Massachusetts Licensed Hazardous Waste Cleanup Professional hired by the Town of Spencer.

b. Cleanup Standards for major contaminants

The Town currently anticipates that the Massachusetts standards for recreational and residential use will be used as the cleanup standard.

c. Laws and Regulations Applicable to the Cleanup

Laws and regulation that are applicable to this cleanup include the Federal Resource Conservation Act, the Federal Toxic Substance Control Act, Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, Commonwealth of Massachusetts environmental law, and town by-laws. Federal and Commonwealth laws regarding procurement of contractors to conduct the cleanup will be followed. In addition, all appropriate permits (e.g., Dig Safe, soil transport / disposal manifests, local demolition permits) will be obtained prior to work commencing.

III. Evaluation of Cleanup Alternatives

a. Cleanup Alternatives Considered

To address contamination at the Site, three different alternatives were considered including Alternative #1: No Action, Alternative #2: Considering the entire Site hazardous, and Alternative #: Remediation of hazardous materials, then demolition of remaining building.

b. Cost Estimates of Cleanup Alternatives:

To satisfy EPA requirements, the effectiveness, implementable, and cost of each alternative must be considered prior to selecting a commended clean up alternative.

Effectiveness – Including Vulnerable / Resiliency Considerations.

- Alternative #1: No Action is not effective in eliminating risk of release of the hazardous materials from the Site nor eliminating the potential of human interaction with these materials due to unauthorized access to the Site.
- Alternative #2: Considering the entire Site hazardous: Although a sizable portion of the Site is considered hazardous, significant portions, once proper remediation is completed, will not be. By treating the entire Site as hazardous and disposing what could be considered regular construction and demolition debris in hazardous material landfills, only takes up precious space in these specialized disposal sites that could be used for hazardous waste.
- Alternative #3: Remediation of the hazardous materials then demolition and disposal of the remainder of the Site. This option is effective at eliminating risk of hazardous material release, proper disposal of the materials, and demolition of the remaining structure effectively to prepare the site for re-use.

Implementability

- Alternative #1: No action is easy to implement as no actions will be conducted.
- Alternative #2: Treating the entire Site as hazardous increases the amount of monitoring and transporting of materials to hazardous landfills increasing the potential for release of materials combined with regular construction and demolition debris.
- Alternative #3: The most intricate of the options but provides for proper remediation of the hazardous materials and then effective disposal of the remaining construction and demolition debris from the Site.

Cost

- There will be no costs under Alternative #1: No Action other than continued costs of the Town to secure the Site to prevent possible interactions between the public and the hazardous materials on site.

- The cost of Alternative #2: Entire Site as hazardous will be the most expensive in that every square foot of materials will be considered hazardous with higher costs of disposal versus regular construction and demolition debris.
- Alternative #3: Remediation and disposal of the remainder of the site is estimated to cost \$1,200,000. (\$500,000 for remediation (disposal of materials and project oversight) and \$700,000 for Site disposal and project management).

c. Recommended Cleanup Alternative

The recommended cleanup alternative is Alternative #3: Remediation of materials and disposal of remaining site.

Alternative #1: No Action cannot be recommended since it does not address the site risks of the hazardous materials on site and does not provide for reuse of the Site.

Alternative #2: Considering the entire Site hazardous is the most expensive of the options.

Alternative #3: Remediation and demolition of the remainder of the Site provides for the effective remediation of the Site, then disposal of the rest of the Site. Salvage may be possible of some of the remaining Site depending on the extent of destruction necessary for hazardous materials remediation. from a safety and cost perspective and allows for recreational and / or residential reuse of the site.

Green and Sustainable Remediation Measures for Selected Alternative

To make the selected alternative greener or more sustainable, several techniques are planned. Best management practices will be used to prevent any potential ground water or rain event from providing for a potential release of storm water from the site during remediation and demolition. In addition, the Town will require the cleanup contractor to follow an idle-reduction policy and reduce the number of mobilizations necessary to the greatest extent practical. Further, work is planned for the dry-weather months to reduce potential run off impacts to the storm water systems. In addition, the Town plans to ask bidding cleanup contractors to proposal additional green remediation techniques in their response to the Request for Proposals for the cleanup contract.