CITY OF CHICOPEE

MAYOR MICHAEL D. BISSONNETTE

November 23, 2011

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

EPA Region 1
Attn: Ms. Diane Kelly
5 Post Office Square, Suite 100
Mail Code OSRRO7-3
Boston, MA 02109-3912

Subject: Former Uniroyal Property Brownfields Cleanup Proposals; Chicopee, MA

Dear Mr. West,

The Uniroyal Site, a portion of 'RiverMills at Chicopee Falls,' represents the largest, most challenging and complex Brownfields redevelopment effort in Chicopee's history. Historically, '...a place of profit where people made things...' these 28 acres were once identified as part of Factory Village, an industrial powerhouse through much of the 19th and 20th centuries.

This complex once employed some 7,000 area residents who worked in armaments, textiles and tires among other industries. Through two centuries of industrial dominance, well-known entities including Savage Arms, Stevens-Duryea Automobiles and Fisk/Uniroyal Tire called Factory Village home. Since the 1980's, the factories stood mostly vacant as Uniroyal Tire minimized and eventually ceased operations.

After the City took ownership, the Site was selected for inclusion in the Commonwealth of Massachusetts' Brownfield Support Team (BST) Initiative. The BST places priority emphasis on selected sites across the Commonwealth concentrating financial, technical and other state level resources to speed redevelopment. Additional emphasis has been placed on the Site by MassDevelopment, the Commonwealth's development and finance authority, with a status designation of Brownfield Priority Project.

The City has made invaluable progress towards achieving aggressive, precedent-setting redevelopment goals. The RiverMills Vision Plan, completed in 2010, reflects not only realistic market conditions but also weaves the neighborhood's desires into an inspiring, viable vision accepted by residents and City officials alike.

This progress has been crucial to preparing the Site for its future, however we now face an uphill struggle that challenges our current momentum; the struggle to identify and secure funds to abate hazardous building materials. With 17 deteriorating structures remaining on-site,

City Hall • Market Square • 17 Springfield Street • Chicopee, Massachusetts 01013
Tel:. (413) 594-1500 • Fax (413) 594-1504 • Email: mbissonnette@chicopeema.gov

totaling over 1.5 million square feet of space, each passing year erodes our ability to abate these buildings safely and cost effectively.

Positive, high levels of energy have been building around this project and we are eager to see this energy continue to grow until the City's collective vision for the Uniroyal property is realized. Therefore, the City of Chicopee respectfully requests a ***$200,000 Cleanup Grant*** to support hazardous building materials abatement.

Required information as follows:

a. ***Applicant Identification:*** City of Chicopee, Office of Community Development
38 Center Street, Chicopee, MA 01013
b. ***Applicant DUNS Number:*** 66981218
c. ***Funding Requested:*** i. Cleanup Grant
ii. $200,000; not requesting a cost-share waiver
iii. Hazardous Substances
d. ***Location:*** Chicopee, Hampden County, Massachusetts
e. ***Property Name & Site Address:*** Former Uniroyal Property: ***Parcel #124-11***
154 Grove Street Chicopee, Massachusetts 01020
f. ***Contacts:*** i. Project Director: Lee M. Pouliot; Planner & Administrator
Office of Community Development
38 Center Street Chicopee, MA 01013
(413) 594-1488 - Fax (413) 594-1495 – lpouliot@chicopeema.gov
ii. Chief Executive: Mayor Michael D. Bissonnette
City Hall, 17 Springfield Street, Chicopee, MA 01013
(413) 594-1500 - Fax (413) 594-1504 - mbissonnette@chicopeema.gov
g. ***Date Submitted:*** November 23, 2011
h. ***Project Period:*** Two years
i. ***Population:*** i. 55,298
ii. The City of Chicopee, Massachusetts is a general purpose unit of local government.
j. ***Special Considerations:*** Please see Attachments.

We are prepared to tackle the challenges associated with realizing a new future for what was the industrial heart of our community. We thank you in advance for taking the time to review our grant application. If you should require any additional information or need clarification regarding any part of our proposal, please feel free to contact us at your earliest convenience.

With Regards,

Michael D. Bissonnette

Michael D. Bissonnette, Mayor

Ranking Criteria for Cleanup Grants

1. *Community Need:*

a. *Health, Welfare and Environment: i. Effect on Targeted Community:* Chicopee's contemporary character is the result of an evolutionary pattern that began in the early 1600's. The City's began as three separate villages: Chicopee Falls, Cabotville and Willimansett. These settlements grew at a reasonable pace but never evolved an economy beyond that of agriculture.

A naturally occurring falls in the Chicopee River garnered attention as the Industrial Revolution took hold in America. In 1822, the Boston Associates realized the value in this resource and purchased water/land rights in Chicopee Falls for mill construction. In an article by John Robert Mullin, this industrial transition is described as, "...if with the coming of the mills, its 170-year dependence on agricultural production, its village character, and its traditional self-governance were simply crushed."

Change was rapid as industrial production increased. Chicopee Falls would become known as Factory Village with housing constructed for an imported workforce. Cabotville and Willimansett developed as similar industrial villages. At the height of production, Factory Village employed some 7,000 area residents. By the end of World War II, however, contracts for products dwindled and so too did Factory Village. Fisk Tire (now known as Uniroyal, Inc.) ceased operations by 1980 and was sold to the neighboring Facemate Corporation, which in vain attempted to create the Chicopee Industrial Park before going bankrupt and closing in 2003. Since the 1980's, the Uniroyal property has sat largely vacant, no longer providing the jobs and economic activity that are responsible for the Falls' development. The deterioration of buildings at the Site was shortly followed by increased economic challenges, dwindling property values and the realization of severe environmental concerns; all compounded by the social implications of a major failure in the City's economic engine.

The impact of Chicopee's industrial heritage is not limited to Chicopee Falls and Factory Village. The industrial complexes of Cabotville and Willimansett have also faded to memory, leaving behind similar areas of concentrated blighted, post-industrial Brownfields and a weak economic outlook unsupportive of visionary redevelopment schemes.

Welfare Concerns – Chicopee Falls is now one of the City's oldest neighborhoods, of a mixed-use character, including low to moderate income residences, commercial, light industrial and public service properties (police & fire services, a district court house and post office). The neighborhood is home to the Church Street Historic District and the Edward Bellamy House; home of the Edward Bellamy Society and Chicopee Historical Society.

Chicopee Falls is divided into two U.S. Census Tracts: 8107 and 8108. The Uniroyal properties are located in Tract 8108. Chart I details basic population data and clearly shows that the populations of the Census Tracts individually and the neighborhood as a whole are composed of significant numbers of both youth and senior citizens. As noted, significant numbers of Veterans also call Chicopee Falls home. Chart II in Section *1.b Financial Information* shows that the neighborhood suffers from significantly higher unemployment and poverty rates while very high percentages of households earn below City, State and national median household income levels.

Table I: Youth & Senior Citizen Populations

	Census Tract 8107	Census Tract 8108	Chicopee Falls
Total Population	6,151	3,823	9,974
Population < 19 years	1,443 ***(23.5%)***	1,008 ***(26.4%)***	2,451 ***(24.6%)***
Population > 65 years	946 ***(15.4%)***	568 ***(14.9%)***	1,514 ***(15.2%)***
Total, Both Categories	2,389 ***(38.8%)***	1,576 ***(41.2%)***	3,965 ***(39.8%)***
Veteran Status	658 **(13.1%)***	375 **(12.9%)***	1,033 **(10.4%)***

(Population percentages based on 2010 U.S. Census data)
(*Estimates based on American Community Survey 5-year Estimates, not accounting for margins of error)

The Massachusetts Office of Environmental Affairs (EOEA) lists portions of both Census Tracts 8107 and 8108 as meeting two of four Environmental Justice population criteria. The criteria met include: households earning 65% or less of statewide household income and 25% or more of residents are minority. The Massachusetts Department of Environmental Protection (MassDEP) has classified Chicopee as an Economically Distressed Area (EDA), defined as areas within the Commonwealth that are eligible for targeted assistance under the Brownfields Act. Further, the Community Development Financial Institutions Fund (CDFI) lists Census Tract 8108 in Severely Distressed Status and Tract 8107 in Eligible Status for the New Market Tax Credit (NMTC) Program which the CDFI administers. Such classifications are based on demographic information, including income, poverty and empowerment zone status.

Chicopee is also a federally designated Empowerment Zone/Entitlement Community per the U.S. Department of Housing and Urban Development (HUD), with all block groups in Tract 8108 and three of the five block groups of Tract 8107 defined as having 51% or greater total number of low to moderate income residents. Chicopee's median household income is $44,018 ± $2,259. Not factoring in the margins of error in American Community Survey 5-year data estimates, approximately 40% of Tract 8107 and 56% of Tract 8108 households live below the City's median income. Approximately 59% and 72% of households, respectively, fall below the Massachusetts median income of $64,081 ± $680.

These data show that Chicopee Falls does contain significant populations of youth, seniors and low to moderate income citizens whose health, welfare and environment are highly impacted by the presence of Brownfields, like the Uniroyal Site, within their neighborhood.

Health Concerns – Chicopee's population is further impacted by higher rates of occurrence for many health issues currently tracked by the Commonwealth. According to MassCHIP (Community Health Information Profile), Chicopee residents suffer from higher rates of the following ailments when compared Massachusetts, overall:

- Asthma;
- Bronchus & Lunch Cancer;
- Cardiovascular Diseases; and
- Diabetes.

In addition to these ailments, 27.6% of Census Tract 8107 and 22.4% of Tract 8108 (25.6% of Chicopee Falls) reported a disability in the 2000 U.S. Census. This was the most recent data available on Disability Status; it is unlikely that this rate has changed based on the presence of specialized housing for the disabled that is located in Chicopee Falls.

The following Hazardous Building Materials, which have been confirmed as present in most of the remaining Uniroyal structures not only compound the above described health issues but have also been linked to additional health complications;

- ***Asbestos*** exposure has been linked to lung cancer, mesothelioma and nonmalignant lung/pleural disorders including asbestosis according to the Agency for Toxic Substance and Disease Registry (ATSDR);
- ***Lead*** exposure has been linked to kidney and nervous/reproductive system damage. The Department of Health and Human Services, the EPA and the International Agency for Research on Cancer have all determined that lead can also reasonably be considered a human carcinogen;
- ***Mercury*** exposure can severely impact the nervous system and permanently damage the brain, kidneys, lungs and developing fetuses according to the ATSDR.
- ***PCB*** exposure has been linked to cancer and immune, reproductive, neurological & endocrine effects according to the EPA;
- **Petroleum hydrocarbon** exposure typically affects the nervous system. These compounds can also affect the immune system, blood, skin, lungs and eyes. According to the ATSDR, some studies have found certain compounds may also be carcinogenic and have effects on developing fetuses;
- ***Pigeon guano & other animal droppings*** exposure can lead to both fungal and bacterial infections if inhaled by humans. Histoplasmosis and cryptococcosis both cause fatigue, fever and chest pains. According to the New York City Department of Health and Mental Hygiene (NYC DOHMH), neither disease is very common however; individuals with compromised immune systems are generally at higher risk for contracting either disease.

Today, the presence of these Hazardous Building Materials places a disproportionate burden on Chicopee's Falls sensitive populations of youth, seniors and low to moderate income residents who already suffer from higher rates of asthma, other respiratory ailments, cardiovascular diseases, diabetes and other disabilities.

Environmental Concerns –
The Uniroyal Site represents 28 acres of Brownfields located at the geographic center of the City. The Site is considered blight on the neighborhood and provides no economic, social or environmental benefits to Chicopee. Most structures have deteriorated beyond economically feasible reuse and structural failures are considered imminent. This threat creates a significant environmental safety risk for the neighborhood and its residents.

The City responded by providing 24-hour security, which was eventually replaced with an alarmed, 12 foot high chain-link fence enclosing the entire Site. Chicopee's Police and Fire personnel monitor the alarm system 24 hours a day and continuously dedicate staff to visiting the Site. An entry protocol was also established and is strictly enforced when Site access is required.

Vacancy raises additional concerns. Civic and neighborhood pride are challenged in the face of such large-scale blight while the Site's appearance creates and aura of danger and disinvestment. Such qualities pose challenges for the City as it strives to re-imagine and re-invest in these properties while identifying avenues for private investment. A lack of interest from the private investment is clear, as evidenced by 30 years of vacancy at a Site with direct river access and stunning views of a rich environmental resource.

Environmental dangers were identified in the Phase I and II Environmental Site Assessments, various structural assessments of the buildings and Pre-Demolition Building Inspections. These reports confirm the buildings' poor structural condition and the presence of asbestos, lead, mercury and other hazardous materials.

Should these hazardous materials be left unabated and structures deteriorate further, the costs associated with demolition and disposal will increase dramatically, while the risk of hazardous materials being released into the atmosphere and exponentially impacting the neighborhood's sensitive populations rises.

Financial Need: The City's financial needs for the remediation and redevelopment of the Uniroyal Site are daunting. Massachusetts municipalities depend on local property taxes to fund local government operations and these 28 acres have provided little if any tax income to the City for a number of years. An estimated $2.9 million in property tax revenue from non-payment of municipal property taxes has already been lost. Additionally, the City has incurred legal, security and planning costs in excess of $400,000 to secure the Site and initiate the redevelopment process. Ongoing costs associated with security and legal issues are estimated at $225,000. To date, a Hazardous Building Material Inspection for Buildings 28, 28 North, 28 Extension and 33 has been completed. This report estimates costs to segregate and manage regulated building materials prior to demolition will total over $2.2 million.

While Chicopee Falls' list of manufacturing milestones is a source of local pride, the legacy of nearly two centuries of industrial dominance is taking its toll on our community. A decline in manufacturing, which is a national phenomenon, has left the City with concentrated areas of vacant industrial complexes that provide no economic benefits. Further, most of the structures remaining on Site have been vacant for over 30 years and have deteriorated beyond any economically feasible reuse. Structural failures and the imminent threat of additional internal collapses increase abatement, demolition and disposal costs.

Further, some two million square feet of industrial space sits idle. Today, there is little demand or interest for production facilities of this scale. As such, a significant burden has been placed on Chicopee's economy and property values, which directly affects the City's tax revenue. To best benefit Chicopee Falls and the City, clean-up efforts must be completed so redevelopment can meet contemporary needs while producing new jobs and amenities for residents and new tax revenue for the City.

The most pressing financial need is for funds to deal with the large quantities of asbestos and other regulated building materials known to exist in the buildings that remain on-site.

Table II: Demographic Information

	Target Community					
	Census Tract 8107	*Census Tract 8108*	*City of Chicopee*	*Hampden County*	*Massachusetts*	*United States*
Population	6,151*	3,823*	55,298*	463,490*	6,547,629*	308,745,538*
Unemployment Rate	25%^	38%^	8.8%†	8.9%†	7.3%†	9.6%†
Poverty Rate	4 - 8 %‡	9 - 21%‡	13 - 18%§	16 - 19%°	10 - 11%°	14.3%°
% Minority	13%*	16%*	14%*	24%*	20%*	26.7%*
Per Capita Income	$24,834 ± $2,238‡	$20,978 ± $2,235‡	$22,481 ± $681§	$24,000 ± $591°	$33,437 ± $339°	$26,530°
Median Household Income	$55,240 ± $7,107‡	$37,361 ± $10,740‡	$44,018 ± $2,259§	$46,809 ± $2,225°	$64,081 ± $680°	$50,221 ± $74°

**Data from the 2010 Census data*

^ Median Percentages based on 5-year ('05-'09) American Community Survey Unemployment Estimates

† Data from the Bureau of Labor Statistics

‡ Based on Margins of Error in 5-year ('05-'09) American Community Survey Estimates

§ Based on Margins of Error in 3-year ('07-'09) American Community Survey Estimates

° Based on Margins of Error in 1-year ('09) American Community Survey Estimates

Currently, the former Uniroyal property represents Chicopee's largest Brownfield poised for redevelopment. Former industrial complexes like Uniroyal pose serious challenges for the neighborhoods they once supported. As the factories closed, a workforce originally brought in to serve Factory Village found employment elsewhere. More recently, between the years of 2005 and 2009, the City's unemployment rate skyrocketed 76%, from 6.5% to 11%. Since 2009, the City's unemployment rate has improved slightly, however, the median estimates presented in the chart above suggest that such an improvement has not occurred in Chicopee Falls, where unemployment may be as high as 25% in Census Tract 8107 and 38% in Tract 8108. These median rates are significantly higher than the City, County and Massachusetts rates. The City has seen an influx in residents of Hispanic heritage in recent years. .

It should also be noted that the Uniroyal properties are located within Census Tract 8108, where the poverty rate is significantly higher than Tract 8107. Using the median household income estimates provided (not factoring in margins of error for the 5-year American Community Survey estimates), the following data suggest a significant portion of both Census Tracts earn well below City, County and State median household income values.

Table III: Estimates of households earning below median household income estimates

	Census Tract 8107	Census Tract 8108
Below Chicopee median household income	39.6%	55.3%
Below Hampden County median household income	43.5%	57.5%
Below Massachusetts median household income	58.7%	72.1%

2. Project Description and Feasibility of Success

Project Description: i. Describe the conditions of the existing property and the proposed or projected redevelopment including the potential site reuse: The 28 acres of Uniroyal property have remained mostly vacant since the early 1980's when Uniroyal Tire ceased operations and sold the property to the neighboring Facemate Corporation. As this application focuses on the abatement of hazardous building materials within existing structures, a discussion of the buildings follows. These summaries are based on a structural analysis completed in May 2010 and a Hazardous Building Material Inspection for Buildings 28, 28 North, 28 Extension and 33 completed in June 2011.

Uniroyal Parcel #124-11 represents 0.349 acres of the total Uniroyal property with one remaining building. The footprint of Building 43 covers 37.2% (0.13 acres) of the parcel and totals 5,550 square feet of vacant industrial space.

- Building 43 is a one-story structure with exterior masonry walls and a structural steel frame system. Rated in fair condition, exterior brick walls exhibit efflorescence and isolated areas where brick appears to have previously failed and been repaired, exhibit signs of new deterioration. Areas of soft, deteriorated brick were also documented.

Redevelopment visioning for the former Uniroyal and neighboring Facemate properties was completed in December 2010. Known collectively as 'RiverMills at Chicopee Falls,' the Vision Plan proposes the creation of an active and passive recreational network that reconnects the neighborhood to the Chicopee River. This network is the armature around which a mixed-use community of residential, commercial and office developments is molded. The first phase of redevelopment begins during fall 2011 when the remaining Facemate buildings (northern portion of RiverMills) will be demolished to prepare for construction of the City's new Older Adult Community Center's (OACC), planned to break ground in late summer 2012. The City anticipates the Center acting as a catalyst, spurring redevelopment efforts on both the Facemate and Uniroyal properties. Additionally, the City has moved forward with Phase II of the Chicopee River Walk, a rail-trail conversion that will link the Uniroyal property to the City's downtown (south-west of the Site).

The redevelopment program for RiverMills is based on extensive market analysis and envisions the following elements:

- active and passive recreational network;
- 33,500 square feet of new commercial/retail space;
- 131,000 square feet of new office space;
- 131 new residential units;
- a 34,500 square foot Recreational Center; and
- a 21,000 square foot Senior Center.

ii. Describe the proposed cleanup plan, including, if applicable, specific engineering and institutional controls: The proposed clean-up plan includes the preparation of specifications for the abatement and removal of regulated building materials and other hazardous substances in Buildings 43. By completing this abatement work, the City will have minimized the potential of having to dispose of larger than necessary quantities of comingled hazardous and

construction/demolition (C&D) debris, which would result in severe increases to disposal costs. Completing abatement activities would also minimize the potential of a hazardous material release should a large structural collapse occur. Completing abatement activities would expedite the demolition of these structures at significantly reduced costs when the City is able to identify and secure funding for such work.

Given the nature of the abatement work to be performed, no institutional or engineering controls would be necessary after abatement completion. All necessary environmental controls will be implemented and properly monitored over the course of the project. All asbestos wastes and other hazardous materials will be properly managed at appropriately licensed off-site disposal facilities.

b. *Budget for EPA Funding and Leveraging Other Resources: i. Budget Table:*

Budget Categories	Project Tasks	Parcel 124-11			
	Task I: Cooperative Agreement Oversight	*Task II: Abatement Design & Procurement*	*Task III: Abatement Activities*	*Task IV: Air Monitoring & Post-Abatement Air Clearance Testing*	*Total*
Personnel		$12,500	$10,000	$7,500	$30,000
Fringe Benefits					
Travel	$2,500				$2,500
Equipment					
Supplies				$1,500	$1,500
Contractual			$85,000		$85,000
Other:		$2,500	$5,000	$1,000	$8,500
Total	**$2,500**	**$15,000**	**$100,000**	**$10,000**	**$127,500**
Cost Share	$417	$2,500	$16,667	$1,667	**$21,251**

Task I: Cooperative Agreement Oversight ($2,500)
Two City Officials will travel to the EPA sponsored Brownfields Conference in 2012. The City will commit CDBG funds to cover staff time related to programmatic costs and to fulfill the necessary reporting requirements to the EPA, allowing more funds to be applied to actual abatement activities. The City of Chicopee will not use any funds for administrative purposes as prohibited by the EPA.

- *Outcomes & Outputs:* Compilation of materials from the Brownfields Conference to share with City Officials and Staff; all required reports for submittal to EPA.

Task II: Abatement Design & Procurement ($15,000)
Professional services related to the pre-demolition abatement design, preparation of bidding documents (including technical specifications) and bidding phase assistance. "Other" costs include limited demolition of portions of the building during supplemental pre-demolition assessment of inaccessible areas. The City will comply with all federal and state procurement requirements in retaining these services.

- *Outcomes & Outputs:* Solicitation of professional services, completion of pre-demolition abatement design documents and bid documents; procurement of contract to complete abatement activities.

Task III: Abatement Activities ($100,000)
Pre-demolition abatement contractor costs for removal and off-site management of regulated building materials in Building 43. Labor costs include professional services oversight and consultation during construction. "Other" costs include contingency for quantity over-runs, if encountered. The City will comply with all federal and state procurement requirements in retaining these services.

- *Outcomes & Outputs:* Complete abatement and off-site management of all hazardous building materials within Building 7 and potentially Building 14, should funds be sufficient.

Task IV: Air Monitoring & Post-Abatement Air Clearance Testing ($10,000)
Includes third party air monitoring during and following completion of asbestos abatement activities. Supply fees include rental costs of air quality sampling equipment. "Other" costs include contingency for quantity over-runs, if encountered.

- *Outcomes & Outputs:* Confirmation that the surrounding environment has been protected from a potential release of asbestos from the Site.

ii. Describe your plan for tracking and measuring progress towards achieving the expected short-term and long-term project outcomes and outputs: The Uniroyal property and the neighboring Facemate property was designated in 2010 as a Commonwealth Brownfield Support Team (BST) project. An initiative of Governor Deval Patrick and Lieutenant Governor Timothy Murray, the BST is tasked with increasing collaboration between state agencies to streamline financial, technical and other resources in support of Brownfields redevelopment across Massachusetts. The BST, which meets bi-monthly, spent considerable time defining the goals of this redevelopment project and tracks progress towards those goals on a master schedule. The abatement activities described in this proposal were identified as a major goal of the BST. Defined outputs and outcomes will be tracked by the BST, should this proposal be successful in securing funding.

Additionally, project outputs and outcomes will be tracked in all quarterly reports submitted by the City's Office of Community Development to the EPA and through input into the ACRES database.

iii. Leveraging: The City has the ability to leverage additional CDBG funds to supplement EPA grant funds during the project should it become necessary to do so. The City has prioritized Uniroyal redevelopment and is committed to realizing the redevelopment Vision Plan. To date the City has invested nearly $2 million in CDBG funds for various aspects of the overall project.

Other leveraged funds include $50,000 from MassDEP via an EPA grant which is being used to fund Hazardous Building Material Inspections on the remaining un-inspected Uniroyal buildings. These inspections are planned to be completed before the end of January 2012. In additional to these funds, MassDevelopment, the Commonwealth's finance and development agency has designated the Site a Brownfield Priority Project. With this designation, MassDevelopment has pledged up to $2 million in funds to further assessment and clean-up efforts. To date the City has utilized approximately $900,000 of that pledge. Further funds that can be leveraged are available from the Pioneer Valley Planning Commission (PVPC) administered Brownfields Revolving Loan Fund (RLF) funded through the EPA. The fund currently has $1.5 million available for sub-grants and loans.

It should also be noted that Michelin North America has invested resources to further assessment and cleanup activities. While MNA is considered the PRP responsible for dealing with residual contamination on the Uniroyal property, MNA is not responsible for hazardous material abatement within buildings or the demolition of any structures. However, as the City has struggled to identify and secure funds to move abatement and demolition work forward, MNA has been limited in their ability to fully assess the environmental issues on site (building footprints cover a significant portion of the property and assessing conditions below foundations is made more difficult and dangerous when considering the poor structural condition of most buildings). If the City can complete abatement activities described in this proposal and fund demolition separately, MNA will be able to move forward with their responsibilities in a more time sensitive manner.

Please see support letters regarding these leveraged resources in the Attachments Section.

c. Programmatic Capability and Past Performance: *i. Programmatic Capability:* The City of Chicopee's Office of Community Development is well versed in the coordination and management of federal grants in support of numerous programs from social services and roadway improvements to larger scale planning projects like the RiverMills Vision Plan. The City of Chicopee has been receiving Community Development Block Grant (CDBG) and HOME funds as an entitlement community for the past 37 years. Staff in the Community Development Office include Carl Dietz, Director of Community Development; Thomas Haberlin, AICP, Director of Economic Development; Kathleen Lingenberg, Director of Housing; Lee Pouliot, Planner & Administrator; Christopher Nolan, Project Manager and Julia Dias, Operations Manager. These six individuals are responsible for the all aspects of the administration of both CDBG and the HOME program.

- *Assigned Staff:* The Community Development Office has served as the lead office controlling assessment, cleanup and redevelopment efforts at the former Uniroyal and neighboring Facemate properties. Under the direct supervision of Carl Dietz and Thomas Haberlin, Lee Pouliot will manage the project should this proposal be funded. Lee is a lifelong resident of Chicopee who completed a Master's Degree in Landscape Architecture at Cornell University in 2010. His final studio project focused on the Uniroyal and Facemate properties, resulting in an in-depth understanding of the challenges and opportunities of assessment and cleanup. He is currently managing the $1.6 million demolition for the former Facemate buildings as well as assisting in the management of the West End's Brownfields Area-Wide Planning Project – funded through a pilot EPA grant program. Lee will have additional support in managing this grant from Chris Nolan, who is currently managing the Older Adult Community Center project.

- *Plan to retain and/or replace leadership:* Lee Pouliot and all Community Development staff are firmly committed to the City of Chicopee and to seeing current redevelopment efforts for the Uniroyal and overall RiverMills project through to completion. We firmly believe this project has the potential to have an invaluable impact on Chicopee Falls while boosting Chicopee's local economy and supporting additional redevelopment needs. Community Development's unique setting within the City allows the Office to interface with a diverse mix of City residents and professionals. Should leadership need to be replaced at any time during the administration of this grant, City Officials would move quickly to identify a qualified and invested individual to step into the position(s). The City is committed to offering opportunities for new individuals to get involved with local government 'on the ground.' The challenges associated with projects like the former Uniroyal property are highly

attractive to young professionals, as is evidenced by Lee's commitment to the project and City following graduation.

- *System to acquire additional expertise:* As discussed in Section 2.b.ii, this project is designated by the Commonwealth as a Brownfield Support Team (BST) project. Any additional expertise required to successfully complete the proposed project can be expedited through the BST. Members of MassDEP, MassDOT, the MA Attorney General's Office, US EPA and MassDevelopment who sit on the BST are committed to the project and have made themselves available to assist with moving any projects at the Site forward. As described in Threshold Criteria, Section 4.a, the City has retained BETA Group, Inc. through an open and competitive procurement process to provide Licensed Site Professional (LSP) services and oversight during the assessment and cleanup phases of redevelopment. BETA Group, through Alan Hanscom (MA License #2152) will provide all required oversight regarding compliance with all applicable environmental and cleanup laws and regulations per BETA's agreed upon Scope of Services with the City of Chicopee. Any other professional expertise related to this project will be retained following all applicable public procurement guidelines.

ii. Adverse Audits: The City of Chicopee received no 'Adverse' Audit findings during the past year.

iii. Past Performance: The City of Chicopee has been a successful grantee during the EPA Brownfields Pilot assessment program, receiving a total of $200,000 beginning in 1996. To the best of our knowledge, the City successfully pursued assessment activities in compliance with all grant requirements and completed all necessary reporting obligations. The grant was closed on January 19, 2001. The projects listed below received funding and are listed as 'Success Stories' on EPA's website.

- ***Former Bay State Wire Company*** – In 1996, an initial Brownfields Pilot Assessment grant of $59,000 was given to the City. Assessment work confirmed the presence of trichloroethylene (TCE), oil, grease and cadmium in the site's soil and groundwater. These activities led to a $310,000 clean-up effort, funded through the Community Development Block Grant (CDBG). Once clean the property was sold to E. Joseph Montemagni, a private developer, for redevelopment as office space.
- ***Former Conway Bedding/Hallahan Lumber*** – Initial success at the former Bay State Wire Company site led to an additional $30,000 in funds in May 1997. Completed assessments led to cleanup and demolition activities supported with CDBG resources. The site was sold to Benedict Broadcasting, an affiliate of CNBC who constructed an $8 million state of the art digital broadcasting station for Channel 22 News.
- ***Former J.G. Roy Lumber*** – In September 1998, the EPA awarded the City with an additional $111,000 in funds. This site received $41,600 for assessment activities. The property was then sold to neighboring J. Polep Distribution Services, who completed remediation activities and demolished existing structures for future expansion. The City assisted with cleanup activities by providing CBDG loan funds to J. Polep.
- ***Former Tri-City Cleaners*** – Taken through tax-foreclosure, this site had a documented 67 year history of contamination. This property received over $35,000 for assessment activities. Assessments were completed by 2000 and with the support of CDBG & other City/State funds the property was redeveloped as a local Department of Motor Vehicle (DMV) branch that has been in operation since 2002.

3. Community Engagement and Partnerships

a. *Discuss your plan for involving the affected community...in site selection for assessments, cleanup decisions or reuse planning, including activities that have already occurred:* Community engagement regarding the Uniroyal and neighboring Facemate properties has been ongoing since the redevelopment visioning process began in February 2010. The planning team, led by VHB, Inc. held three public meetings throughout the process, at which over 50 community members participated. Information gathered from these meetings informed a 'preferred' vision, which was revealed to the community in December, 2010.

Also in February 2010, a team of Cornell Master of Landscape Architecture students initiated a parallel master planning project known as 'H.E.A.L Chicopee: A Strategic Plan for the Uniroyal/Facemate Properties.' The team's extensive community outreach efforts resulted in the participation of over 1,000 community members. The students documented seven oral history interviews, 404 community survey responses and 682 student visioning responses. The students partnered with the Chicopee Public School System, the Chicopee Historical Society/Edward Bellamy Society, the Chicopee Public Library, the Chicopee Senior Center, local businesses as well as the professional team. The data gathered was used to define strategies addressing historic preservation, stormwater/flood management and Brownfields remediation. A redevelopment framework plan was developed that addresses varying market conditions plausible by 2030.

The H.E.A.L team held two community meetings; the first on March 1, 2010 at the Edward Bellamy House; the second on May 26, 2010 at Chicopee High School. Approximately 30 residents attended the first meeting and 40 attended the second. The May 26th presentation was recorded and broadcast on a local cable community access channel.

Efforts to keep the community informed have occurred through numerous avenues. Copies of all presentations and reports have been made available at the Chicopee Public Library and for download from the City's website. Local newspaper and news stations have also covered most activities with reports and articles. The final H.E.A.L presentation was recorded and aired numerous times on the local community access channel. Additionally, the City has created a page off its main website specifically for the Uniroyal/Facemate Site; while VHB has created a similar page with documents related to the master planning process. The H.E.A.L team also utilized the social networking site Facebook to connect with City residents and the online tool Survey Monkey to develop/distribute survey materials.

The City plans to continue communicating with residents through the above mentioned avenues. Should a language barrier be identified, the City will make every effort to procure appropriate interpreters. The City is also prepared to accommodate those with special needs such as the blind and the deaf.

Describe your efforts and/or plans to develop partnerships with your local/state/tribal environmental and health agencies, other relevant governmental agencies and any local environmental job training program to ensure your brownfields project is successful: Partnerships between the City of Chicopee and local/state agencies have been crucial to the work that has been accomplished this far and reaching future goals. The City has formed a strong partnership with MassDEP, the Commonwealth's environmental authority which oversees Massachusetts' cleanup program. This

partnership is strengthened by the Site's designation as a Brownfield Support Team (BST) Project. The BST, which is in its second year of pilot projects, strives to build collaboration between required local, state and federal agencies to streamline the redevelopment process. Dedicated partners who sit on the BST include MassDEP (which chairs the team), MassDOT, MassHistoric, MassDevelopment, the Massachusetts Attorney General's Office and the US EPA.

The City's Health Department has been extremely active on the City's internal Task Force, created specifically to keep all key City Departments informed of assessment and clean-up at the Uniroyal Site. The Health Department has provided oversight of potential health concerns and is responsible for implementing humane solutions to populations of wild animals and stray cats that have become a nuisance to the neighborhood. The City is also collaborating with the Pioneer Valley Planning Commission regarding future connections to the Connecticut River Bikeway project. If successful, the connection would tie the City and the Site into a regional recreation system.

Mayor Michael Bissonnette participated in the Mayors' Institute on City Design (MICD) held in Philadelphia in September 2010. An initiative of the National Endowment of the Arts, the conference was co-sponsored by the Penn Institute of Urban Research, the American Architectural Foundation and the United States Conference of Mayors. The theme of the conference was 'water' and the Mayor presented the Uniroyal/Facemate Site looking for ideas to reestablish connections between the community and the Chicopee River, while addressing challenges such as contamination, stormwater/flood controls and access constraints.

While a local Brownfields Training Program is not active in Western Massachusetts, the City of Chicopee will make every effort to network with other job training programs including the City's High School Vocational Program; CareerPoint, a local work force and economic development career center based on Holyoke, MA and the Westover Jobs Corps located in Chicopee.

c. *Provide a description of, and role of, the key community-based organizations involved in your project:*
The City of Chicopee is pleased to include the following community organizations among those dedicated to the redevelopment of the Uniroyal and neighboring Facemate properties;

- ***Friends of the Chicopee Senior Center***; is a 501(c)(3) non-profit organization dedicated to the construction of the City's new Older Adult Community Center. The group has launched an ambitious fundraising campaign to support design and construction activities as the Center will be placed on a portion of the Facemate property. With this project underway, the group has placed emphasis on supporting the clean-up and redevelopment of the Uniroyal property as the new Center will be located on a ¼ mile from the property;
- ***The Chicopee Council on Aging***; has been an avid supporter of the new Older Adult Community Center, working tirelessly to identify an appropriate site for many years. The Council's mission emphasizes the physical, mental and spiritual well-being of the City's older adults and has a vested interest in seeing the Uniroyal property developed in a way that enhances the activities run through the Older Adult Community Center;
- ***The Edward Bellamy Society/Chicopee Historical Society***; has worked tirelessly to advertise community meetings, disperse/collect community surveys and circulate the H.E.A.L Chicopee document. The group is also working to establish a collection of images, plans,

maps and memorabilia regarding the Uniroyal and Facemate properties and has played a key role in preserving Chicopee's rich industrial heritage;

- ***The H.E.A.L Chicopee team***; Cornell Master of Landscape Architecture students. Lee Pouliot, who is proposed as the project manager of this grant, is one of the H.E.A.L team's members. He is a lifelong Chicopee resident and currently works with the Office of Community Development.

Letters of support from these organizations along with attendance lists from public meetings can be found in the Attachments Section.

4. Project Benefits

a. *Welfare and/or Public Health*: ***Welfare***: Abatement of the proposed Uniroyal buildings would significantly assist in preparing these structures for demolition. In doing so, imminent threats of additional structural failures, collapses and the release of hazardous building materials to the atmosphere will be removed. In the long term, the project initiates the removal of severe blight from the neighborhood which will showcase the City's commitment to redevelopment while bolstering civic pride and incentivizing renewed private investment.

The redevelopment of this property will also provide new construction and full/part employment positions in the neighborhood. Additionally, the proposed green space network will offer residents, the neighboring Older Adult Community Center and youth new modes of safe transportation and recreation along a Riverfront that does not exist today.

All federal and state regulations governing abatement and disposal activities will be followed during this project. Air quality monitoring will be on-going during and after abatement activities to ensure the neighborhood's sensitive populations are projected during the project.

The Vision Plan for redevelopment is based on the neighborhood's desires for the property. Affordable, equitable development including affordable housing was identified as a key component of the plan. This vision is devised to be an extension of the neighborhood that supports existing development and does not over power them to create a gentrification challenge.

Public Health: Hazardous building materials confirmed to be present in the Uniroyal Buildings include asbestos, lead, mercury, petroleum hydrocarbons and excessive animal wastes. According to the Hazardous Material Inspection Report, PCBs may also be present. The abatement of these hazardous materials will remove a significant health hazard from the Site and also allow demolition of these failing structures to occur in a cost efficient manner. Demolition of these structures is the only economically feasible path for removing a major safety hazard and the likelihood of another building collapse. The successful abatement of all hazardous materials and the resulting building demolition are the positive outcomes of this project.

Abatement, eventual demolition and redevelopment of the property will also impact the neighborhood's health statistics. The removal of these hazardous building materials, removes the possibility of them being released to the atmosphere which protects sensitive populations suffering from higher rates of asthma and bronchus/lung cancers. The proposed green network for the

property will offer residents new recreational opportunities that will address cardiovascular ailments, diabetes and obesity. The green network will also provide alternative modes of transportation, reducing automobile emissions thereby creating a healthier overall environment for the neighborhood's sensitive populations.

b. Economic Benefits and/or Greenspace: *i. Economic Benefits:* Area-wide redevelopment visioning has already been completed for the Site. Complete redevelopment of the both the Uniroyal and neighboring Facemate sites hold a number of economic outcomes for Chicopee Falls and the City. The Site's Market Analysis provided evidence that the Site would succeed as a mixed-use development including housing, small commercial establishments and development of the City's office market. The Vision Plan indicates this development scheme will support the creation of 200 new construction jobs and 275 new full/part time jobs within the City while sustaining another 100 existing positions. Private investment at build-out of the Vision Plan will reach $100 million. ***Therefore, in the long-term two economic outcomes are certain: the creation of new jobs & additional business operations and real estate tax revenues for the City and State.***

Short-term economic benefits include preparing the identified buildings for demolition and site preparations for redevelopment. As the City moves forward with construction of the New Older Adult Community Center on the Facemate property, this project would emphasize the City's commitment to redevelopment efforts on the Uniroyal Site as while providing proof of public reinvestment in Chicopee Falls to spur private investment. Further, as a result of abatement, demolition and redevelopment, local property values will increase and further support a renaissance of redevelopment in Chicopee Falls.

ii. Other non-economic benefits: The major benefit of this project is preparing for the demolition of the identified Uniroyal buildings to be abated. Additionally, Site's Vision Plan has already identified new expanses of open space and recreational amenities in high demand within the neighborhood, including an extension of the Chicopee River Walk and Bikeway, additional passive/active recreational spaces such as greenways, nature preserves and habitat areas. Access to the Chicopee River will be restored and existing ecological communities enhanced as a unique natural resource. The City is also committed to Low Impact Development (LID) strategies for storm and flood water management.

Further, the City can explore a variety of opportunities for preserving and retelling Chicopee's industrial history on-site as an 'outdoor' classroom and laboratory specifically for the City's younger generations. Positive outcomes will include improvement to the neighborhood's character and well-being and enhanced access to the Site, surrounding neighborhoods and the River.

c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse: Redevelopment of the former Uniroyal and neighboring Facemate properties will incorporate a number of sustainable practices as were defined in the area-wide planning process that resulted in a final plan for the properties in December 2010. Many ideas generated in H.E.A.L Chicopee have been layered into this Vision Plan. The City has considered how the Site might address MassDEP's 'Sustainable Development Principles' throughout the redevelopment process. To date, the following environmental benefits from infrastructure and sustainable reuse have been identified and considered key characteristics of the Vision Plan:

- Direct environmental improvement for a designated Environmental Justice population;
- Enhanced opportunity for strong public-private partnership to advance public amenity demands that support and incentivize private investment;
- Equitable, mixed-use development based on known market demands for affordable housing for targeted age groups of 35 years & younger and 55 years & older;
- Preservation of the Site's industrial legacy and industrial remnants as social 'connectors;'
- Provide educational opportunities for unveiling Chicopee's rich history, environmental systems and impacts of industry on our landscapes;
- Creation of a new, community-desired green space network, which will provide alternate modes of transportation and crucial recreational opportunities;
- Establish links between Chicopee Falls and surrounding neighborhoods;
- Re-establish access between the City and Chicopee River, enhance the River eco-system;
- Align development with existing Pioneer Valley Transit Authority (PVTA) bus routes while enhancing connections to the Westover Metropolitan Airport;
- Design landscape areas as multi-functional spaces layering recreation with stormwater low-impact design (LID) elements, habitat restoration while aligning the design of these spaces with the objectives of the Sustainable Sites Initiative (SITES);
- LEED Certification for new structures; the City has targeted LEED Silver for its new Older Adult Community Center on the Facemate property and intends this project to set the standard for interested developers;
- Exploration of alternative energy systems, especially geo-thermal on a site-wide scale;
- Preservation of existing wells on the Uniroyal for use as irrigation source in future;
- Building re-use and material salvage for reuse during redevelopment;
- Utilize demolition ABC materials on site to backfill basements (reduce off site trucking of waste and on site trucking of required fill materials);
- Increase the density of the Chicopee Falls neighborhood;
- Reuse existing utilities including electric, water and sewer systems;
- Expand the Chicopee River Walk and Bikeway and connect with the Connecticut River Walk and Bikeway linking the City and Site with a regional recreation resource; and
- Create 'shared' parking areas, to reduce footprint of parking lots.

Attachments Section

Former Uniroyal Tire Complex
City of Chicopee, Massachusetts

- Threshold Criteria for Clean-up Grants
- State Letter of Acknowledgment
- ABCA
- Public Meeting Advertisement & Sign-in Sheet
- Sign-in sheets from previous Community Meetings
- Leveraged Resource Letters
- Letters of Support from Community Organizations
- Special Considerations Checklist

Threshold Criteria for Cleanup Grants

1. ***Applicant Eligibility:***

a. *Eligible Entity:* The City of Chicopee, Massachusetts is a general purpose unit of local government.

b. *Site Ownership:* The City of Chicopee acquired the former Uniroyal Tire Complex properties as a result of a levy and execution on a money judgment on May 11, 2009 as recorded in the Hampden County Registry of Deeds, Book 17783, pages 139 & 142.

2. ***Letter from the State or Tribal Authority:***

See letter from the Massachusetts Department of Environmental Protection (MassDEP) located in the Attachments Section.

3. ***Site Eligibility and Property Ownership Eligibility:***

a. *Basic Site Information:* Former Uniroyal Tire Complex – Parcel #124-11
154 Grove Street
Chicopee, MA 01020
Owner: City of Chicopee

b. *Status & History of Contamination at the Site:* ***The Former Uniroyal Tire Complex*** consists of approximately 28 acres of land, originally developed during the late 1800s. In 1870 the property was used as a lumber yard by the Chicopee Manufacturing Company. From 1896 to 1898 the property was owned by the Spaulding and Pepper Company, who manufactured bicycle tires. The Fisk Rubber Company, which later changed its name to United States Rubber Company and then to Uniroyal, Inc., manufactured bicycle automobile & truck tires and adhesives from 1898 to 1981. Uniroyal Inc. closed their plant in 1980 and sold the property to Facemate Corporation in 1981. Facemate leased portions of the Uniroyal buildings to various companies for manufacturing, printing, machine shops, office, storage and health care facilities. Currently, seventeen (17) vacant buildings, encompassing 1.5 million square feet, remain standing at the Site.

Parcel #124-11 represents 0.349 acres of the Uniroyal property with one remaining building. The footprint of Building 43 covers 37.2% (0.13 acres) of the Site and total approximately 5,550 square feet of vacant industrial spaces.

Former manufacturing operations entailed the use of approximately 22 underground storage tanks (USTs) and five aboveground storage tanks for the storage of various petroleum products and solvents. Twenty-five pad and/or wall mounted transformers were used to distribute electrical power for site operations. Of these, 23 contained PCB-based dielectric fluids. Also, the Boston and Maine Railroad tracks bisect the Site. Railcars historically delivered carbon black to the complex for use in tire manufacturing.

Michelin North America, Inc. (MNA) acquired the assets of Uniroyal, Inc. circa 1990 and is considered the primary responsible party (PRP) dealing with residual contamination at the Uniroyal property. To date, MNA has identified and removed all known USTs on the property and all

e. *Environmental Assessment Required for Cleanup Proposals:* Various consultants have completed environmental studies on the Uniroyal property, dating back to the early 1980's. A Phase I Limited Site Investigation was completed by ECS in March 1991. A Phase II Comprehensive Site Assessment (CSA) was completed by ECS in August 1997. Additional Phase II Investigations were completed by ECS in February 1998. A Supplemental Phase II CSA was completed by Gannett Fleming in June 2005. Gannet Fleming also completed a Phase III Remedial Alternatives Analysis in June 2005 as well as various Phase IV Remedy Implementation Plans from March, 20006 through April 2010. Additional work since that date has been completed by GZA GeoEnvironmental, Inc. and includes a Supplemental Phase II CSA, dated January 2011.

Phase I assessment work was completed in conformance with the American Society of Testing Materials (ASTM) Standard Practice E 1527-05 for Phase I ESAs, which meets Environmental Protection Agency (EPA) Standards and Practices for All Appropriate Inquiries (AAI); Final Rule (40CFR Part 312).

On May 10, 2010, an Existing Conditions Report was completed by Tighe & Bond on some of the remaining Uniroyal buildings. Further, a Pre-Demolition Inspection Report for Hazardous Building Materials in Uniroyal Buildings 28S, 28N, 28N Extension & 33 was completed by Smith & Wessel Associates, Inc. on June 20, 2011. These assessments detail the exceptionally poor condition of the identified buildings and confirm the presence asbestos, lead and other hazardous materials. Further Pre-Demolition Inspections are planned to be completed on the remaining Uniroyal structures during Fall 2011.

Property Ownership Eligibility

f. *CERCLA § Liability: The* City of Chicopee, as the current owner of the Site, is protected from CERCLA § 107 liability as a local government entity that acquired the properties through tax foreclosure.

g. *Enforcement Actions:* No ongoing or anticipated environmental enforcement actions have been issued for the Site. The City is unaware of any inquiries or orders from federal, state or local governmental agencies regarding the responsibility of any party for contamination or hazardous substances on Site. Response actions by MNA that have occurred/are occurring on the Uniroyal properties are not being performed under any order or enforcement action.

h. *Information on Liability and Defenses/Protections:*
i. Information on the Property Acquisition: 1) The City of Chicopee acquired the former Uniroyal Tire Complex properties as a result of a levy and execution on a money judgment.

2) The former Uniroyal Tire Complex properties were acquired on May 11, 2009 as recorded in the Hampden County Registry of Deeds, Book 17783, pages 139 & 142.

3. All properties were acquired from former President Walter F. Mrozinski of the former Facemate Corporation.

4. The City has no current or prior familial, corporate or financial relationships or affiliations with the previous owners of the Uniroyal properties.

cleanup activities are deemed necessary. As defined by the Commonwealth, the LSP "ensures that actions taken to address contaminated property comply with Massachusetts regulations and protect public health, safety, welfare and the environment." In Massachusetts, LSPs are licensed by the state Board of Registration of Hazardous Waste Site Cleanup Professionals.

Following designation as a Brownfield Priority Project by MassDevelopment, the City released a Request for Proposals for Licensed Site Professional Services for the Uniroyal Site. The City followed all federal (40 CFR 31.36) and state public procurement guidelines during the process and has retained BETA Group, Inc. of Norwood, MA to provide LSP services related to oversight, assessment and cleanup of residual contamination and management of hazardous materials at the Site. Alan Hanscom, MA License #2152 – serves as the lead BETA representative to the City. The primary environmental regulations governing cleanup of the Site include the Massachusetts Contingency Plan (MCP), the Wetlands Protection Act (WPA), the Resource Conservation and Recovery Act (RCRA) and the Toxic Substances Control Act (TSCA).

BETA reports directly to the City's Office of Community Development and BETA's services related to subsurface contamination is funded through the MassDevelopment Brownfields Priority Project Fund. Services related to building inspections, demolition and other related services are separately funded. If funding is appropriated under EPA's Cleanup Grants program, BETA would continue to provide LSP and oversight services. Any additional contractors needed to perform the proposed cleanup projects will be retained following all federal (40 CFR 31.36) and state public procurement guidelines.

b. *Provide your plan to acquire necessary access to adjacent/neighboring properties:* In the event access to adjacent properties is required, the City is prepared to execute access agreements with adjacent property owners, including extending 'additional insured's liability coverage, for consultants and/or contractor activities. Such activities may include either short or long term arrangements, leases, easements or some form of deed restrictions or activity and use limitations (AULs). We will involve appropriate legal counsel for any such arrangements, as required.

5. Cost Share:

a. *Statutory Cost Share:*

i. Demonstrate how you will meet the required cost share: The City of Chicopee will meet the 20% cost share through the use of appropriate Community Development Block Grant (CDBG) funds.

ii. The City of Chicopee is not requesting a waiver of the cost share requirement.

6. Community Notification:

The City hosted a public meeting at City Hall on November 17th at 6:00p.m. The public meeting was announced through advertisement in the Republican, the area's newspaper and on the City's website. Proposal drafts, including a draft analysis of brownfield cleanup alternatives (ABCA) were made available at the Chicopee Public Library and for download from the City's website. A representative from the City's Office of Community Development was present, however, no community members attended. No comments were submitted to the Office of Community Development by the November 21st deadline. The required documentation including advertisement and sign-in sheets are included in the Attachments Section.

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

One Winter Street Boston, MA 02108 • 617-292-5500

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

RICHARD K. SULLIVAN JR.
Secretary

KENNETH L. KIMMELL
Commissioner

November 23, 2011

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

RE: **STATE LETTER OF ACKNOWLEDGMENT**
City of Chicopee Application for EPA Cleanup Grant Funds

Dear Mr. West:

I am writing to support the three proposals submitted by the City of Chicopee under the Fiscal Year 2012 U.S. Department of Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program for site-specific hazardous substances cleanup. Funding from EPA will further facilitate efforts by the City to cleanup the Former Uniroyal Complex located at 154 Grove Street. Grant funding would be utilized to perform abatement activities in in and beneath the handful of buildings that are still standing on the three parcels in question (#s 124-03, 124-11 & 147-09).

In 2008, Governor Deval Patrick and Lieutenant Governor Timothy Murray created the Massachusetts Brownfield Support Team (BST) Initiative. This effort further concentrates financial, technical, and other resources at the state level to a select group of challenging, yet promising, brownfield projects. Please note that the City of Chicopee's RiverMills complex was chosen in September 2010 to be part of the next round of BST projects, which ensures any funding provided by EPA will be supported by a focused commitment of state resources.

We greatly appreciate the EPA's continued support of brownfield efforts here in the Commonwealth!

Sincerely,

Kerry Bowie
MassDEP Brownfields Coordinator

Cc: Lee Pouliot, Planner & Administrator, City of Chicopee, Office of Community Development, 38 Center Street, Chicopee, MA 01013
Bernard Fish, MassDEP Western Regional Office

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TDD# 1-866-539-7622 or 1-617-574-6868
MassDEP Website: www.mass.gov/dep
Printed on Recycled Paper

Analysis of Brownfields Clean-up Alternatives

Former Uniroyal Tire Complex – Parcel #124-11
City of Chicopee, Massachusetts

Introduction and Background

Site Location: Former Uniroyal Tire Complex – Parcel #124-11
154 Grove Street
Chicopee, MA 01020
Owner: City of Chicopee

Previous Uses of the Site: *The Former Uniroyal Tire Complex* consists of approximately 28 acres of land, originally developed during the late 1800s. In 1870 the property was used as a lumber yard by the Chicopee Manufacturing Company. From 1896 to 1898 the property was owned by the Spaulding and Pepper Company, who manufactured bicycle tires. The Fisk Rubber Company, which later changed its name to United States Rubber Company and then to Uniroyal, Inc., manufactured bicycle automobile & truck tires and adhesives from 1898 to 1981. Uniroyal Inc. closed their plant in 1980 and sold the property to Facemate Corporation in 1981. Facemate leased portions of the Uniroyal buildings to various companies for manufacturing, printing, machine shops, office, storage and health care facilities. Currently, seventeen (17) vacant buildings, encompassing 1.5 million square feet, remain standing at the Site.

Parcel #124-11 represents 0.349 acres of the Uniroyal property with one remaining building. The footprint of Building 43 covers 37.2% (0.13 acres) of the Site and total approximately 5,550 square feet of vacant industrial spaces.

Former manufacturing operations entailed the use of approximately 22 underground storage tanks (USTs) and five aboveground storage tanks for the storage of various petroleum products and solvents. Twenty-five pad and/or wall mounted transformers were used to distribute electrical power for site operations. Of these, 23 contained PCB-based dielectric fluids. Also, the Boston and Maine Railroad tracks bisect the Site. Railcars historically delivered carbon black to the complex for use in tire manufacturing.

Past Assessment Findings: Michelin North America, Inc. (MNA) acquired the assets of Uniroyal, Inc. circa 1990 and is considered the primary responsible party (PRP) dealing with residual contamination at the Uniroyal property. To date, MNA has identified and removed all known USTs on the property and all transformers have been removed by MNA and the City. MNA has managed transformer fluids and PCB-impacted soils (>50 ppm) at appropriately licensed off-site waste management facilities. In addition, MNA has consolidated PCB-impacted soils (<50ppm) on the Site and has initiated construction of a cap under applicable TSCA regulations.

Currently known residual site contamination includes PCBs, heavy metals, EPH, SVOCs & VOCs in soil and EPH & VOCs in groundwater. PCBs have also been identified in accumulated sediment in on-site stormwater drainage systems and in the toe drain system for the flood control dikes along the westerly boundary of the Site. MNA has executed cleaning of the stormwater and toe drain systems during 2011, under an EPA-approved TSCA Work Plan.

The City is working in cooperation with MNA to help prioritize site cleanup activities, but 'unknown subsurface conditions' remain under existing buildings and related structures. Additional sampling of sediments in the Chicopee River has also been required by Massachusetts Department of Environmental Protection (MassDEP). As additional buildings are demolished at the Site, MNA has indicated they will be implementing supplemental subsurface investigations. It is important to note that MNA's obligation for response actions will not fully achieve redevelopment requirements and that additional environmental cleanup will likely be required.

MNA's responsibilities as a PRP at the Uniroyal property are primarily related to the assessment and remediation of existing environmental contamination under Chapter 21E, the Massachusetts Contingency Plan and the Toxic Substances Control Act regulations. The assessment and abatement of hazardous substances within the on-site buildings, along with actual demolition of most of the buildings, are the City's responsibility and are funded separate from MNA's efforts. To date, the City has demolished only six buildings; 17 structures remain to be abated and demolished.

A structural condition assessment report of the Uniroyal buildings was prepared by Tighe & Bond in May 2011 that documents the very poor structural condition of nine of the eleven buildings on the former Uniroyal property. Subsequently, structural evaluations have identified additional buildings for demolition.

Reference is made to the section of this application entitled "***Summary of Phase I & II Assessment Reports and Other Environmental Investigation"*** for a discussion of the hazardous materials inspection reports completed to date.

Project Goals: The former Uniroyal Tire Complex property is part of a larger redevelopment project known as RiverMills at Chicopee Falls. Situated at the geographical center of the City, these post-industrial lands were once part of Factory Village, a complex of workforce housing, businesses and services that brought industrialization to Chicopee beginning in 1822. Today, RiverMills represents the City's largest Brownfields redevelopment project.

The RiverMills Vision Plan was completed in December 2010. Extensive community outreach resulted in a plan reflecting community desires and endorsed by the City as the official redevelopment guide. The plan proposes the creation of an active/passive recreational network that reconnects the neighborhood to the Chicopee River. This network is the armature around which a mixed-use community is molded. This mixed-used scheme includes 33,500 square feet of new commercial space, 131,000 square feet of new office space, 131 new housing units the City's new Older Adult Community Center and a potential Family Recreation Center. Estimates indicate that this scheme will leverage an estimated $100,000,000 in private investment when full build out is achieved and support the creation of 275 new full and part time, local jobs.

City officials and residents alike have repeatedly underscored the importance of RiverMills redevelopment as the avenue through which the Chicopee's heritage can be preserved. It is hoped that through redevelopment RiverMills can once again be a part of the community it helped to establish. With this in mind the City has established the following vision and objectives to guide redevelopment:

> ***"The City of Chicopee envisions the creation of a mixed-use, energy conscious, walkable community integrated within the historic framework of Chicopee Falls. With expanded business and job opportunities and new living options for residents, redevelopment will re-***

connect the neighborhood to its rich environmental context while re-forging links between Chicopee Falls and Chicopee Center..."

Redevelopment Objectives

- *Mixed Use Redevelopment:* The City is interested in redevelopment schemes that provide a diverse mix of uses on the Site. This mix should preferably include complementary uses that will directly and indirectly enhance the area as a place to live, work, shop, dine, visit and as a place to connect with recreational and environmental amenities. Schemes should provide for high quality improvements with uses that will actively contribute to the economy of the City, provide public access where appropriate and add to the neighborhood's vitality and tax base.

- *Site Legacy:* The City has a vested interest in preserving the site's history as part of the redevelopment process. It is hoped that redevelopment schemes will address how the site's industrial past can be incorporated into its reuse, remembering the site's history.

- *Environmental Connections:* Development schemes should strive to surround proposed buildings with a series of green spaces linked with pedestrian walkways, greenways or trails that also take advantage of the Chicopee River Walk that is currently under development. The entire RiverMills development should strive to be a pedestrian friendly environment, while enhancing the Chicopee River. Redevelopment schemes should propose avenues through which the river can be accessed and utilized from RiverMills by the public.

- *Neighborhood Connections:* The RiverMills property has been inaccessible to the Chicopee Falls neighborhood for nearly thirty (30) years Redevelopment schemes should propose avenues through which the site will be reintegrated into the surrounding neighborhood and enable new connections to Chicopee Center and Memorial Drive's commercial corridor.

- *Green Development:* The City of Chicopee supports of sustainable development practices and plans to pursue LEED certification for the City's new Older Adult Community Center. The use of 'green' development techniques, with respect to energy efficiency, materials, building systems, construction methods, long-term building operations and site planning will be key factors considered during the developer selection and bid process.

- *Effective Public-Private Partnership:* With City, state and federal agency investments of nearly 3 million dollars to date, redevelopment schemes should not place disproportionate requirements on City resources.

Summary of Phase I & II Assessment Reports and Other Environmental Investigations: Numerous environmental site investigations related to the release of oil and other hazardous materials have been performed at the referenced Uniroyal property over the past several years by Gannett Fleming and GZA, on behalf of Michelin North America, the company who acquired the assets of the former Uniroyal Company. With respect to hazardous building materials, two (2) separate assessments have been performed at the subject buildings and supplemental hazardous materials inspections have been scheduled for December 2011, as follows:

- GZA provided a preliminary hazardous materials inspection letter report of all buildings for the City of Chicopee in 2007;
- Smith & Wessel, under subcontract to BETA, completed a more detailed inspection and sampling program of Buildings 28S, 28N, 28N Extension and 33 in June 2011; and
- DEP has agreed to fund a supplemental hazardous materials inspection of the remaining site buildings, with an estimated completion date in late December 2011 or early January 2012.

With the completion of the supplemental asbestos and hazardous building materials inspection, we will have a reasonably comprehensive assessment of the extent and nature of the pre-demolition abatement requirements for the Uniroyal buildings to be demolished to facilitate site redevelopment.

Applicable Regulations and Cleanup

Cleanup Oversight Responsibility: The Commonwealth requires property owners to hire a Licensed Site Professional (LSP) if cleanup activities are deemed necessary. As defined by the Commonwealth, the LSP "ensures that actions taken to address contaminated property comply with Massachusetts regulations and protect public health, safety, welfare and the environment." In Massachusetts, LSPs are licensed by the state Board of Registration of Hazardous Waste Site Cleanup Professionals.

Following designation as a Brownfield Priority Project by MassDevelopment, the City released a Request for Proposals for Licensed Site Professional Services for the Uniroyal Site. The City followed all federal (40 CFR 31.36) and state public procurement guidelines during the process and has retained BETA Group, Inc. of Norwood, MA to provide LSP services related to oversight, assessment and cleanup of residual contamination and management of hazardous materials at the Site. Alan Hanscom, MA License #2152 – serves as the lead BETA representative to the City. The primary environmental regulations governing cleanup of the Site include the Massachusetts Contingency Plan (MCP), the Wetlands Protection Act (WPA), the Resource Conservation and Recovery Act (RCRA) and the Toxic Substances Control Act (TSCA).

BETA reports directly to the City's Office of Community Development and BETA's services related to subsurface contamination is funded through the MassDevelopment Brownfields Priority Project Fund. Services related to building inspections, demolition and other related services are separately funded. If funding is appropriated under EPA's Cleanup Grants program, BETA would continue to provide LSP and oversight services. Any additional contractors needed to perform the proposed cleanup projects will be retained following all federal (40 CFR 31.36) and state public procurement guidelines.

Clean-up Standards for Major Contaminants and Planned Reuse: The various regulated building materials subject to pre-demolition abatement for this project include:

- Asbestos containing building materials, including both friable (easily crumbled, crushed, or pulverized by hand) and non-friable suspect ACBM within the buildings, including the following types of materials:
  - Thermal system insulation, such as pipe, boiler, tank, and duct insulation;

- Surfacing materials, such as fireproofing, acoustical and decorative plasters, or other coatings applied by spray or trowel; and
- Miscellaneous materials, such as floor and ceiling tiles, mastics, roofing materials, and blown-in insulation.

The applicable standards require segregation and off-site disposal of asbestos waste containing greater than 1% asbestos on a weight basis.

Releases of asbestos containing materials to the environment are also regulated under the Massachusetts Contingency Plan.

- Lead based painted surfaces pose a potential risk to the environment due to leaching of lead from wastes placed in a landfill. The primary cleanup standard that drives decision making for lead paint is the Resource Conservation and Recovery Act (RCRA) that regulates hazardous waste management.

  In the case of lead paint, the leachate standard is 5 mg/l for the Toxicity Characteristic Leaching Procedure Test (TCLP) that simulates an acidic environment in a landfill in the laboratory.

  The regulations require that representative sampling and testing be performed on the demolition debris that is to be disposed. In certain cases, exemptions apply when such materials are to be re-used or recycled. In either event, it is our opinion that surfaces with greater than 5% lead content be segregated and disposed as RCRA hazardous waste. That threshold value may vary, depending upon the nature and volume of the lead painted materials with respect to the total volume to be disposed or recycled.

- Polychlorinated Biphenyls (PCBs) are primarily regulated under TSCA, with USEPA maintaining jurisdiction over all PCB releases greater than 50 ppm. The management of most PCB-containing equipment and fluids is also regulated under TSCA, but may also be subject to various regulations under RCRA and the Massachusetts Contingency Plan (MCP). Releases to the environment less that 50 ppm are regulated under the MCP.

Laws & Regulations Applicable to the Cleanup: There are three primary federal regulations that govern the pre-demolition abatement and disposal of regulated building materials:

- Resource Conservation and Recovery Act (RCRA);
- Toxic Substances Control Act of 1976 (TSCA); and
- Asbestos Hazard Emergency Response Act (AHERA) of 1986.

In addition to the regulations promulgated under the referenced laws, the MassDEP and US EPA have provided numerous guidance documents and policies that govern the manner in which the presence of regulated building materials is determined and the manner in which they are removed, handled and disposed. Such regulations are very prescriptive and close adherence to the requirements is required,

except in unusual circumstances when site-specific requirements are waived by state and/or federal regulators.

In this case, the MassDEP has jurisdiction over most activities involving the abatement and off-site management of regulated building materials. Several federal and state solid and hazardous waste regulations, including air and resource protection regulations govern the licensing and permitting of pertinent recycling and disposal facilities.

Specific state regulations that govern pre-demolition abatement and off-site recycling and disposal activities include:

- Solid Waste Regulations, administered through MassDEP (310 CMR 7.000 and 19.0000);
- Air Quality Regulations, Department of Labor Standards, Division of Occupational Safety (453 CMR 6.00);
- Massachusetts Contingency Plan (MCP) at 310 CMR 40.0000; and
- Massachusetts Hazardous Waste Regulations at 310 CMR 30.0000.

There are numerous policy and guidance documents that also regulate the handling, transportation and management of regulated building materials.

Sampling protocols for the inspection and assessment of asbestos containing building materials are based upon the following EPA guidance documents:

- *The Asbestos Hazard Emergency Response Act*, 40 CFR Part 763
- *Asbestos in Buildings: A Simplified Sampling Scheme for Friable Surfacing Materials*, (EPA Document 560/5-85-030a, October, 1985)
- *Asbestos Exposure Assessment in Buildings, Inspection Manual* (Yellow Book)
- *Guidance for Controlling Asbestos-Containing Materials in Buildings* (EPA Document 560/5-85-024)

Evaluation of Clean-up Alternatives

Clean-up Alternative A – No Action

The "no action" alternative is not feasible, since abatement of the regulated building materials is required before building demolition can commence. Therefore, no further consideration of this alternative will be made.

Clean-up Alternative B – Conventional Abatement

As discussed previously, the abatement measures and off-site management requirements for all regulated building materials, including the handling, transportation, disposal and documentation requirements are very prescriptive and there are few opportunities to deviate from those requirements. This alternative includes complete compliance with all of the regulatory requirements.

Clean-up Alternative C – Alternative Work Practices

As a Brownfield Support Team (BST) site, there has been significant discussion and a willingness on the part of the MassDEP to relax certain abatement requirements, given the magnitude of the project and site-specific circumstances that enable abatement to proceed without many of the work zone set-up and monitoring requirements. That is primarily due to the poor structural condition of the buildings to be demolished and, with the exception of asbestos workers; there are no sensitive receptors in the immediate vicinity of the work. A Generic Asbestos Abatement Work Plan, applicable for site-wide demolition work, is under discussion with the Brownfields Support Team, including MassDEP regulatory staff.

Furthermore, a similar initiative related to beneficial reuse of building materials (primarily including coated asphalt, brick and concrete) is underway and we anticipate execution of a Memorandum of Understanding (or similar document) with MassDEP that will result in significant project cost savings.

Cost Estimates for Each Alternative

Clean-up Alternative A – No Action

Not Applicable

Clean-up Alternative B - Conventional Abatement

Conventional abatement will largely be feasible at Building #43; however, as part of the overall planning for the site redevelopment, the Brownfields support Team has laid the groundwork for alternative work practices. This alternative does not include relaxation of any current abatement and waste management requirements. The probable pre-demolition abatement and management cost for regulated building materials at Building #43, including a 20% contingency, is $140,000.

The abatement methods to be involved are routinely provided on similar projects and there would be little concern that they would not be effective.

Clean-up Alternative C – Alternative Work Practices

Alternative work practices for this project are proposed to include relaxation of the pre-abatement work zone preparation requirements and construction of critical barriers at only windows, doors and other means of access and egress.

The estimate of probable costs for implementation of pre-demolition abatement of regulated building materials at Building #43, using MassDEP-approved alternative work practices, is $127,500.

Recommended Clean-up Alternative:

We recommend that Alternative #3, Alternative Work Practices, be the selected clean-up alternative.

City of Chicopee
Office of Community Development

38 Center Street, Chicopee, MA 01013
Telephone (413) 594-1490 ~ Facsimile (413) 594-1495

The Republican, Monday, November 7, 2011

NOTICE OF REQUEST FOR PUBLIC COMMENT & NOTICE OF PUBLIC HEARING

November 7, 2011
CITY OF CHICOPEE -
OFFICE OF COMMUNITY DEVELOPMENT
38 CENTER STREET
CHICOPEE, MA 01013

The City of Chicopee, through its Office of Community Development will conduct a public hearing to receive public input and comment on three (3) 2012 United States Environmental Protection Agency (EPA) Brownfields Cleanup Grant proposals regarding future remediation work planned at the former Uniroyal Tire properties (154 Grove Street) as well as one (1) 2012 EPA Brownfields Assessment Grant proposal for contaminant assessment activities planned for Chicopee Center's West End neighborhood. Copies of the proposals will be available at the Chicopee Public Library's Main Branch (449 Front Street) and digitally from the City's website after November 11, 2011.

Any individual, group or agency wishing to comment on the proposals may do so either through the public hearing or through written comments submitted to the Chicopee Office of Community Development (OCD). All comments received by OCD will be considered prior to finalizing and submitting the proposals to the EPA. Written comments must be received by the Office of Community Development by November 21, 2011 at 5:00p.m. to be considered.

The Public Hearing will be held at 6:00p.m. on Thursday, November 17, 2011 in the Law Conference Room at City Hall, 17 Springfield Street Chicopee, MA.

(November 7)

FY 2012 EPA Brownfields Assessment & Clean-up Grant Proposals
West End & Uniroyal Proposals
Public Meeting
November 17, 2011

Name:	Street:	Contact # or Email
Lee M. Pollitt	Office of Community Development	594-1488

Uniroyal Public Meeting
Thursday, April 22, 2010
6:00 to 8:00 pm
Community Room, Library

Name	Address	Phone	Email
Carol Ladue	8 Valley View Ct.	532-0262	
Marge & Harvey Lafton	3 Cypress Ave	593-9904	
Kate Brown	27 Laurel St	594-1516	kbrown@chicopeema

Uniroyal Public Meeting
Thursday, April 22, 2010
6:00 to 8:00 pm
Community Room, Library

Name	Address	Phone	Email
Carl Dietz	38 Center St	594-1490	Cdietz@chicopee-ma.gov
Al Hanscom	315 Norwood Park St	781/255-1982	Ahanscom@beta-inc.com
~~Zygmunt Wachta~~	Norwood MA		
Zygmunt Wachta	19 Walnut Ave	592-2191	ZYGWA@AOL.COM
Paul + Yvette Courchene	81 Northwood ST	5921214	—
Sandra Lazalle	7 Valley View Ct.	594	
Adele M Tawrel	79 Sunflower Av	592-5637	
Susan Tawrel	79 Sunflower Ave.	5925637	
Sherryl Gelinas	150 Mountainview St	5936054	
Guy Dalton	47 Waterman Ave, E.L.	530-6682	gdalton@gfnet.com
Ann Lutsenvitz	134 Mountainview	593-6077	
Ruth Nawrocki	22 Simonich St.	592-0880	ruthnawrocki@verizon.net
Robert C Kedrowicz	64 Ellerton St	592-0010	
Chris Myhrow	BB&G	272-6281	cmyhrow@Bulkley.com
Fred Krampitz	430 EAST	592-1950	
[illegible]	40 Madison ST	594-6078	
Daniel Nawrocki	22 Simonich St	592 0880	vze3mcw3@verizon.net

VHB *Computations*

Project: | Project #
Location: | Sheet of
Calculated by: | Date:
Checked by: | Date:

SIGN-IN SHEET

Title *Public Meeting #2 4-22-10*

Name	Affiliation	Phone or E-Mail
Ed Starzec	MassDevelopment	estarzec@massdevelopment.com
JEFF GALARNEAU	VHB	jgalarneau@vhb.com
MARIO RIX Harvey LAFLEUR	Senior Center	NONE
WILFRED TISDELL	C.O.A. member	N/A
EULA MOREAU	C.V.N.A	N/A
EDNA DESCOTTE	C.O.A. member	N/A
MARGE WICKSTROM	SENIOR CENTER	
RON ZIEMBA	FORMER RESIDENT	—
Steve Jendrysik	Chic. Hist Com	

Uniroyal/Facemate Redevelopment Plan Meeting
Wednesday, May 26, 2010
6:00pm-8:00pm

NAME	ADDRESS	PHONE#	EMAIL
TOM NALLEN		4135923615	
Maurice Piotte		413 536-7054	
Sandra Rapolle			
Ronald J. Ray		413-5341527	
Sandra A. Pered		413-5946581	
Betty SHREWSBURY			
Donna K. Conroy		5946295	
COURTNEY PATRICIA CONROY	303 E. MAIN	885-3256	
Daniel Laurin	Chicopee	594-5529	
Francis Desmarais	58 Worthington St	534-1497	
Dennis Pauliot	122 Clark St	5332823	
Rudi Swol	160 State St	532-2170	

Uniroyal/Facemate Redevelopment Plan Meeting
Wednesday, May 26, 2010
6:00pm-8:00pm

NAME	ADDRESS	PHONE#	EMAIL
Anthony Resnick	38 Sherwood St	592-9129	
Fran Moreau	40 Chapel St	5345865	
Bill Tindell	40 Chapel St	5345865	
Rick Rege	37 Barbara St.	538-7051	
KEHN W. DELUDE	255 PADGETTE St.	593-6421	
Robert A. Fedorowicz	64 Ellerton St	592-0010	
SUZANNE WRIGHT	184 MOUNTAINVIEW ST	593.3840	
BOB WRIGHT	184 MOUNTAINVIEW ST	593-3840	
BILL ZASKEY	11 LEEDS ST	5925651	WMZ@VERIZON.NET
Bill Robbins	Chicopee Water Sled	594-4195	
MArt Betlt Costello	66 Vuss Ave. Chic	532-975	

Uniroyal/Facemate Redevelopment Plan Meeting
Wednesday, May 26, 2010
6:00pm-8:00pm

NAME	ADDRESS	PHONE#	EMAIL
N. Ewick	153 Jean Cr.	unlisted	ewickne@yahoo
JOE MATHIEU	84 RICH ST.	5979526	
JOHN MORAN	16 Leeds Cr	5946458	
Donald J Lamothe	164 Meadow ST	5321018	
Nicolette Williams	302 Grove St	nicolette.williams@gmail.com	
Stefanie Linderme	59 Taylor St.	459-5167	Slinderm@Student.umass.edu
Steve Jendrysik	215 Newbury St. Chic. MA 01013		
George R. Moran	Councilor W-7.		
Pete Hebert	57 Conrad St.	594-9382	
Bert Pagel		5825088	

Uniroyal/Facemate Redevelopment Plan Meeting
Wednesday, May 26, 2010
6:00pm-8:00pm

NAME	ADDRESS	PHONE#	EMAIL
Ralph Shrewsbury	72 Lauzier Terr	5933861	RShrews38@AOL
Dorothy Moreau	101 Narragansett Blvd.		
Joseph Conroy	302 Grove St	594-6295	
Mark Vickers	170 Grove St	4135945529	
Lorraine Baron	98 Cyman Dr Chic. 01013	413-592-0126	lfbaron17@yahoo.com

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

DEVAL L. PATRICK
Governor

TIMOTHY P. MURRAY
Lieutenant Governor

RICHARD K. SULLIVAN JR.
Secretary

KENNETH L. KIMMELL
Commissioner

Mayor Michael Bissonnette
Town Hall
17 Springfield Street
Chicopee, MA 01013

September 26, 2011

RE: Chicopee-RTN: 1-436
Uniroyal and Facemate Sites
154 Grove Street
Brownfield Assessment Funding

Dear Mayor Bissonnette;

It has come to the attention of MassDEP that the City of Chicopee was unsuccessful in obtaining an EPA Targeted Brownfields Assessment Grant. As you know the Uniroyal complex and adjacent Facemate property is a high priority project for MassDEP as confirmed by Governor Deval Patrick and Lieutenant Governor Timothy Murray's inclusion of the properties in the Brownfield Support Team (BST) Initiative.

MassDEP has secured up to $50,000 in Brownfield Assessment Funding, granted to MassDEP through EPA, which could be used by the City of Chicopee for pre-demolition hazardous-material surveys/assessment. This funding cannot be used for abatement, demolition, and/or cleanup, as it is an assessment-only grant.

If this is of interest to the City, please contact Eva Tor, MassDEP Deputy Regional Director/Bureau of Waste Site Cleanup at (413) 755-2295. The City will be required to submit to MassDEP a detailed scope of work (SOW) detailing what assessment work the funding would be used for. If the proposed SOW is approved by the EPA the assessment work would be completed by a MassDEP state-funded contractor.

Sincerely,

Michael Gorski
Regional Director
Western Regional Office

e-cc: Thomas Haberlin, City of Chicopee, Office of Community Development
Carl Dietz, City OCD
Lee Pouliot, City OCD
Catherine Finneran, MassDEP/Boston Brownfield Coordinator
Ben Fish, MassDEP/WERO Brownfield Coordinator

This information is available in alternate format. Call Michelle Waters-Ekanem, Diversity Director, at 617-292-5751. TDD# 1-866-539-7622 or 1-617-574-6868
MassDEP Website: www.mass.gov/dep
Printed on Recycled Paper

MASSDEVELOPMENT

November 25, 2011

Mr. Donald West, Environmental Management Support, Inc.
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

Re: FY2012 Brownfields Cleanup Grant

Dear Mr. West,

As MassDevelopment's regional administrator for the Massachusetts Brownfields Redevelopment Fund, I am pleased to support the City of Chicopee's application for Brownfield Cleanup funds for the former Uniroyal property in Chicopee. MassDevelopment has designated the Uniroyal and Facemate sites as Brownfields Priority Projects which provides Chicopee access to up to $2 million in MassDevelopment cleanup funding. To date, Chicopee has expended nearly $900,000 on cleanup activities leaving an additional $1.1 million for continued response action requests.

The need for asbestos abatement has significantly hampered the efforts to move the site cleanup activities at Uniroyal forward. Many of the buildings on site have begun to collapse, making it necessary to demolish and remove the building debris in order to perform testing and cleanup necessary to advance the project. Asbestos removal costs have created a real hardship as the legislation creating the MassDevelopment Brownfields Priority funding specifically excluded asbestos remediation from eligibility. MassDevelopment's understanding of the project enables us to attest to the need for asbestos remediation funding. We request EPA support for the Chicopee application so that the good work in progress at the site can continue.

Working with the City of Chicopee, MassDevelopment has collaborated on an extensive redevelopment planning effort for the Uniroyal site, and continues to fund and support remediation work on the site. Without the needed funding for asbestos removal, we are very concerned that cleanup efforts will soon be put on hold at the site.

MassDevelopment supports the Chicopee application for Brownfield Cleanup funding for asbestos abatement at the former Uniroyal site. The funding is crucial to continuing the ongoing cleanup and ready the site for redevelopment. Thank you for your consideration of this grant application.

Sincerely,

Sean Calnan
Vice President, Community Development

Catalyst for Regional Progress

PVPC

Timothy W. Brennan Executive Director

November 28, 2011

Mr. Carl Dietz
City of Chicopee
Community Development Department
38 Center Street
Chicopee, MA 01013

Dear Mr. Dietz,

The Pioneer Valley Planning Commission currently has access to roughly $1.5 million in EPA-provided brownfields revolving loan funds and expects to receive additional funds in loan repayments in the upcoming months. These funds can be used for cleanup planning, remedial activities, and confirmatory sampling at sites that are impacted primarily by hazardous materials.

Depending on project-specific eligibility requirements, these funds are available for use in Chicopee and other Pioneer Valley communities in the form of subgrants and/or low-interest loans. PVPC looks forward to working with the City of Chicopee and Chicopee's development community to protect human health and the environment and to make Chicopee's brownfields ready for productive re-use.

Regards,

Andrew Loew
Senior Planner
Brownfields Revolving Loan Fund Program Manager

Pioneer Valley Planning Commission 60 Congress Street - Floor 1, Springfield, MA 01104-3419
phone 413.781.6045 fax 413.732.2593 TTY 413.781.7168 www.pvpc.org

WIGGIN AND DANA

Counsellors at Law

Wiggin and Dana LLP
Two Stamford Plaza
281 Tresser Boulevard
Stamford, Connecticut
06901-3284
www.wiggin.com

Barry J. Trilling
203.363.7670
203.363.7676 fax
btrilling@wiggin.com

November 22, 2011

Karen Betournay
City Solicitor, City of Chicopee
Chicopee City Hall, 1st Floor
17 Springfield Street
Chicopee, MA 01013

Re: Former Uniroyal Site, Chicopee, MA

Dear Karen:

I understand that The City of Chicopee is in the process of applying for additional grant funds to abate hazards and eventually demolish the Uniroyal buildings at the proposed River Mills site. As the successor to Uniroyal, my client Michelin North America, Inc. has pulled the laboring oar in assessing and remediating the former tire-making facility over the last several years. You have informed me that to support the City's grant applications it seeks to provide evidence to the granting agencies that it has obtained firm commitments from other parties to pay for cleanup activities at the site. As stated in my September 1, 2011 letter to Massachusetts Office of Housing and Economic Development Secretary Gregory Bialecki, a copy of which I've attached to this letter, "Michelin is committed to continue its collaborative efforts with the City of Chicopee towards final clean-up and redevelopment of the former Uniroyal property." This commitment reflects a resource for remedial activities at the site in addition to and beyond the grant funds for which the City is applying to support the proposed project activities.

Please consider this a "letter of support," reflecting Michelin's continuing cooperation with the City and as an indication of Michelin's commitment to continue its assessment and clean-up activities at the Site.

Best regards,

Barry J. Trilling

BJT:cp

16310\1\2630841.1

WIGGIN AND DANA

Counsellors at Law

Wiggin and Dana LLP
Two Stamford Plaza
281 Tresser Boulevard
Stamford, Connecticut
06901-3284
www.wiggin.com

Barry J. Trilling
203.363.7670
203.363.7676 fax
btrilling@wiggin.com

September 1, 2011

Secretary Gregory Bialecki
Executive Office of Housing & Economic Development
One Ashburton Place, Room 2101
Boston, MA 02108

Re: MassWorks Infrastructure Program

Secretary Bialecki:

As attorney for Michelin North America, Inc. (Michelin) concerning the Massachusetts Contingency Plan (MCP) remediation of the former Uniroyal tire manufacture facility in the City of Chicopee (the Site), I write to support the City of Chicopee's MassWorks Infrastructure Grant proposal for the proposed demolition of Uniroyal Building 33 and the remaining Lower Tier buildings.

The City has informed Michelin that it has requested MassWorks funding for demolition and infrastructure projects planned for Site redevelopment as part of the "River Mills at Chicopee Falls." With the oversight of the Massachusetts Department of Environmental Protection (MassDEP) and the U.S. Environmental Protection Agency (USEPA), Michelin's remedial efforts at the Site are progressing. Regrettably, however, the presence of severely deteriorated buildings at the Site presents a major impediment to the prompt and efficient completion of these activities. These poor structural conditions prevent Michelin's environmental consultant, GZA GeoEnvironmental Inc., from safely accessing basements to conduct necessary assessments and, if it may be determined necessary to do so, to conduct remedial actions required by the Massachusetts Contingency Plan (MCP). As indicated on plans appended to the City's MassWorks application, the former Uniroyal buildings cover a significant portion of the Site. Demolition of selected buildings (particularly those in the "lower tier") as proposed in the City's application, would clearly accelerate our safe access and, if needed, remediation of currently inaccessible areas.

Further, the City has informed Michelin that the City's plan for the River Mills redevelopment envisions a final grading plan in the "middle tier" of the Site which is not consistent with Michelin's current USEPA-approved consolidation area in Exposure Unit 5 (between Buildings 8 and 28 South) for soils contaminated with low levels of polychlorinated biphenyls (PCBs). This soil consolidation was undertaken pursuant to the requirements of the federal Toxic Substances Control Act -TSCA.

The City has requested that Michelin move the consolidation area to the basement of Building 33 to accommodate its River Mills grading plan. The City's Licensed Site Professional, Alan Hanscom, has provided the City and Michelin with an opinion stating that the basement of Building 33 has large enough capacity to accommodate the TSCA stockpile, plus additional quantities of contaminated soils which additional remedial activities may potentially generate from other Site locations. This relocation of the consolidation area to the basement of Building 33 could be accomplished, however, only after the demolition (above the basement) of that building. On the condition of Building 33's demolition being assured, Michelin has agreed to evaluate and consider the request, approval of which would also require the approval of USEPA and MassDEP. As noted, the approval of Michelin, MassDEP, and USEPA, would require the completion of demolition activities the funding for which we understand that the City now has requested from MassWorks.

Michelin is committed to continue its collaborative efforts with the City of Chicopee towards final clean-up and redevelopment of the former Uniroyal property. As noted above, demolition of existing structures could facilitate both environmental assessment and potential follow-up remediation, while advancing the City's redevelopment plans. This is a "win-win" proposition to which Michelin lends its support.

Best regards,

Barry J. Trilling
Partner, Wiggin and Dana, LLP
Attorney for Michelin North America, Inc.

BJT:cp

16310\1\2595789.1

Friends of Chicopee Senior Citizens Inc.

c/o Chicopee Council on Aging
7 Valley View Court
Chicopee, MA 01020

November 17, 2011

U.S. EPA
Office of Brownfield and Land Revitalization
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20360

Dear Reader:

The Friends of Chicopee Senior citizens, Inc. is a 501(c)(3) organization dedicated to helping seniors in Chicopee. We have committed to raising 2 million dollars towards the cost of a new facility for us. We are currently involved in that effort and have raised so far over $300,000.

When Mayor Bissonnette first proposed a site for a new center on the Uniroyal property, we were asked to walk the area. While some of us, in our 80s, were not able to walk the entire property, we were able to see the possibilities. Those who did go along the dike talked about how beautiful it is now and how, once cleaned and redeveloped, wonderful it can be.

The new center is now going to be located on the Facemate property. Work has begun on the design for this new facility. It is our hope that with funding from your office, the Uniroyal property will be cleaned and the area can be redeveloped to make it a jewel in the city. Because of our age, we remember when this area was a major manufacturing site. We watched as the buildings were allowed to deteriorate and become a real eyesore. We would like to see the area become what it once was, a place bustling with activity from the new senior center, businesses, housing and green spaces.

We are asking for your support in making these efforts go forth.

Sincerely yours,

Adele Tawrel

Adele Tawrel
President

Chicopee Council on Aging
and Senior Center
7 Valley View Court
Chicopee, MA 01020-1132

Telephone 413.534.3698
FAX 413.534.9046
www.chicopeema.gov

November 18, 2011

U.S EPA, Office of Brownfields and Land Revitalization
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

Dear Sir:

It is with great enthusiasm and excitement that I write this letter of support of our city's pursuit of a 2012 EPA Brownfields Cleanup Up Grant regarding the Uniroyal property. We, of the Council on Aging, recognize that there are many additional steps that must be taken before this site is clean and healthy for those who live and work close by.

The city has taken numerous steps to clean up this piece and the Facemate site. A new 21,000 sq. ft. center for older adults will be built on the latter area.

The Falls currently has a small, but vibrant retail section. In addition to the post office, seniors could and would take advantage of the convenient offerings if the Uniroyal area was cleaned and rebuilt. One can only imagine the possibilities.

The Chicopee River at this location is truly beautiful. The river landscape is unspoiled and would be greatly appreciated by those who have the time and temperament to enjoy its peaceful offerings. Surely, there would be many of our vibrant elderly who would take advantage of the opportunities for fishing, bird watching, walking, and yes, bicycling on a proposed bike path. This area would be a lovely place for our walking group to meet for morning walks from the center.

It is our belief that your support of this effort would really help a blighted area to regain a new life full of new opportunities.

Sincerely yours,

Charles Desmarais, Jr.
Chairperson

Chicopee Council on Aging
and Senior Center
7 Valley View Court
Chicopee, MA 01020-1132

Telephone 413.534.3698
FAX 413.534.9046
www.chicopeema.gov

November 21, 2011

U.S. EPA
Office of Brownfield and Land Revitalization
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460

To Whom It May Concern:

As the Executive Director of the Chicopee Council on Aging and Senior Center, I have often driven past the Uniroyal Building and thought what a tragedy. It is such an eyesore on a main street within the city. Now the city is making progress on the Facemate land where a new multi-purpose senior center will be constructed and completed by the summer of 2013.

Our programming is built upon a holistic approach to health. Two factors that we are concerned with include a natural environment and a connection to others. This location can be a place where people can walk or ride a bike on the proposed bike trail. But with new businesses being attracted to that area, customers would have more choices.

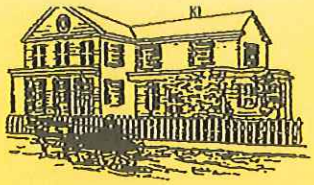
With funding from the 2012 EPA Brownfields Clean-up Grant, the Uniroyal area would be moving closer to the day when redevelopment could become a reality. People have seen the project moving forward with some of the demolition that has taken place. Once the senior center is open at the other end, developers will be interested in pursuing sites on Uniroyal.

It is our hope that this funding will be award to the Office of Community Development, City of Chicopee so that older adults and the residents of that area will have a pleasurable destination and experience new things.

Sincerely yours,

Sandra Lapollo

Sandra Lapollo
Executive Director



THE BELLAMY HOUSE
CHICOPEE'S HISTORIC MUSEUM

November 21, 2011

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

EPA Region 1
Attn: Ms. Diane Kelly
5 Post Office Square, Suite 100
Mail Code OSRR07-3
Boston, MA 02109-3912

Subject: Former Uniroyal Property Brownfields Cleanup Proposals; Chicopee, MA

Dear Mr. West,

The Board of Directors of the Edward Bellamy Memorial Association Incorporated wishes to indicate our wholehearted support for the City of Chicopee's application for a 2012 EPA Brownfields Clean-up Grant.

The Edward Bellamy Memorial Association was founded in 1972. Three years later the organization purchased the Bellamy Homestead, a National Historic Landmark located at 91-93 Church Street in Chicopee Falls, Massachusetts. In 1978, the Church Street Neighborhood was designated a federal historic district.

In 1982, the Association fully restored the world famous author's home. Today the Chicopee Historical Society and the Chicopee Historical Commission are headquartered in the Bellamy Library and Museum. The structure is a community treasure located on a hill overlooking the former Uniroyal and neighboring Facemate properties.

Today our members are active participants in the community wide planning effort to resurrect 'Factory Village." Our people are volunteers working for the new Older Adult Community Center, while advocating for the proposed Chicopee River Walk and serving on the Mayor's RiverMills Task Force for redevelopment of the Uniroyal and Facemate properties.

The location and prompt removal of existing contamination at the site will speed a city-wide effort to reclaim our spectacular river basin while reimagining a historically significant period in Chicopee's industrial past.

Yours Truly,

Stephen R. Jendrysik

Stephen R. Jendrysik
President
s.jendrysik@charter.net – 413-594-6496
cc. (EBMA) Board of Directors

Lee M. Pouliot

mobile 413.265.3706
e-mail lmp227@cornell.edu
web site www.issuu.com/PouliotLM
address 922 dark street chicopee, ma 01013

November 23, 2011

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

EPA Region 1
Attn: Ms. Diane Kelly
5 Post Office Square, Suite 100
Mail Code OSRR07-3
Boston, MA 02109-3912

Dear Mr. West:

As a member of the H.E.A.L Chicopee team and a lifelong resident of Chicopee, I am thrilled to write a letter in support of the City's EPA Brownfields Cleanup proposal for the former Uniroyal property. My team members and I, all Cornell University Master of Landscape Architecture students, hoped our project would have lasting influence during the redevelopment process. Clearly, the pursuance of financing for clean-up activities dictates H.E.A.L Chicopee has had many impacts.

During the planning process, I focused much of my attention on community outreach activities. A portion of these efforts included working to educate City youth about the history of the Uniroyal and neighboring Facemate sites and their importance to the City's development and how sustainability can play a role in re-imagining the Site's future. Our team developed two lessons and a visioning exercise which asked children to imagine Chicopee twenty years in the future. Each student was then tasked with creating a new city shield representing his/her idea.

These activities were presented to the Superintendant of Schools and dispersed to all school principals. **Ten schools participated with 682 total students responding.** Each response was analyzed and classified to build an understanding of how the Uniroyal/Facemate properties could meet the needs of younger generations.

Our efforts spurred a larger conversation regarding how youth may be involved in similar, future projects. Concerns for local history education were voiced and efforts are underway to better expose youth to Chicopee's unique history. Ideas for the preservation of Uniroyal/Facemate structures have been vetted as one avenue to tell the Site's history through preserved artifacts.

I stand by H.E.A.L Chicopee's extraordinary community outreach efforts and feel, as a resident, that this represents one of the most successful efforts recently undertaken. The information garnered from students along with the data collected from 404 community surveys provided the context for subsequent H.E.A.L Chicopee redevelopment suggestions and guidelines.

Should have any questions regarding our outreach efforts or the information we gathered, please feel free to contact me. I am lucky enough to now be working with Chicopee's Office of Community Development and hope to continue seeing progress on a project I am so intimately tied to.

With Regards,

Lee M. Pouliot
Community Development Planner/Administrator
413-594-1488
LPouliot@chicopeema.gov

November 23, 2011

Environmental Management Support, Inc.
Attn: Mr. Don West
8601 Georgia Avenue, Suite 500
Silver Spring, MD 20910

EPA Region 1
Attn: Ms. Diane Kelly
5 Post Office Square, Suite 100
Mail Code OSRR07-3
Boston, MA 02109-3912

Subject: Support Letter for Chicopee's Uniroyal Brownfields Grant Proposal

Dear Mr. West,

My name is Chris Hardy and I was a member of the H.E.A.L Chicopee research team from Cornell University that provided a strategic plan for the landscape program of the Uniroyal and neighboring Facemate Sites. This team worked in parallel to a professional effort led by VHB, Inc. and BETA Group, Inc. who were charged with creating a redevelopment plan and first phase ESA. I understand that the City of Chicopee is applying for EPA Brownfields Cleanup grants and I would like to voice my support of the City's plan for the future. The City's leadership has shown a commitment to cleaning up the Site and promoting appropriate urban infill and is seeking fiscally viable solutions to the urban blight that is challenging the community.

The City of Chicopee is in a unique situation among the rust belt communities of the Northeast. The majority of families who live in the City are descendants and relatives of the original factory workers who moved to Chicopee upon the original construction of the mills. This population in endemic and is invested in living in the city close to family. This population also recognizes the legacy of manufacturing that created their community. Unfortunately, this legacy is also blight for the community – as the Uniroyal Site is just one of many sites that are currently abandoned Brownfields concentrated near the City's center. The loss of industry creates a community malaise, both in the urban fabric and also in the narrative of the City. This is a City of people who are invested in community memory, but also a population that is depressed about the current status of their home.

The citizens of Chicopee also believe this malaise can be changed for the better. In a formal survey, we collected data from 403 adults and almost 700 school children to determine a majority vision for the future. We were consistently surprised by the enthusiasm of the participants, both in their responses as well as the public workshops. We found many unusual conclusions as to the opinions of the population – from demographics revealing that the young adult and high school generations were the most interested in historic preservation, to the revelation that the most popular single landscape program for the site would be a river access pedestrian and bicycle trail.

Due to the location of the site adjacent to the City center, the active investment of many citizens in the urban revitalization, and the relatively low levels of contamination, this site is prime for redevelopment. Unfortunately, the City is not a growing market and the overhead

costs associated with the redevelopment of this Brownfields site pushes local developers into the Greenfields surrounding the City. Public money, well allocated, could close this gap and help restore Chicopee to a green and healthy environment for the families to utilize and share stories about their heritage.

If you have any questions about our work in Chicopee, would like to review any of our documents or need any further information, please feel free to contact me.

Thank you for your time,

Chris Hardy, CA
Landscape Designer
SWA Group
55 New Montgomery Street
Suite 888
San Francisco, CA 94105
415.836.8770 phone

Appendix 3
Special Considerations Checklist

Please identify (with an *X*) if any of the below items apply to your community or your project as described in your proposal. EPA will verify these disclosures prior to selection of the grant.

- ☐ Community population is 10,000 or less
- ☐ Federally recognized Indian tribe
- ☐ United States territory
- ☐ Applicant assisting a Tribe or territory
- ☐ Targeted brownfield sites are impacted by mine-scarred land
- ☐ Targeted brownfield sites are contaminated with controlled substances
- ☒ Community is impacted by recent natural disaster(s)
- ☒ Community demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation
- ☐ Community experiencing plant closures (or other significant economic disruptions), including communities experiencing auto plant closures due to bankruptcy
- ☒ Applicant is a recipient of a HUD/DOT/EPA Partnership for Sustainable Communities grant
- ☒ Community is implementing green remediation plans