



## CITY OF NEW BEDFORD

SCOTT W. LANG, MAYOR

November 28, 2011

Environmental Management Support, Inc.

Attn: Mr. Don West

8601 Georgia Avenue, Suite 500

Silver Spring, MD 20910

Phone 301-589-5318

RE: Application for Brownfields Cleanup Grant – 480 Union Street, New Bedford, MA

Dear Mr. West:

On behalf of the City of New Bedford, I am pleased to submit the grant proposal referenced above. In this transmittal letter, you will find the information required in the grant guidelines.

- a. Applicant Identification: City of New Bedford, Massachusetts
- b. Applicant DUNS number: 075719187
- c. Funding Requested: \$200,000
  - i) Grant type: Cleanup
  - ii) Federal Funds Requested: \$200,000; The City is requesting a cost-share waiver (refer to funding limitations for cleanup grants)
  - iii) Contamination: Petroleum
- d. Location: New Bedford (Bristol County), Massachusetts
- e. Property name and complete site address, including zip code: 478 to 480 Union Street, New Bedford, MA 02740
- f. Contacts
  - i) Project Director:  
Cheryl Henlin, Environmental Planner  
phone: (508) 961-4576 fax: (508) 961-3045  
email: [Cheryl.henlin@newbedford-ma.gov](mailto:Cheryl.henlin@newbedford-ma.gov)  
mailing address: 133 William Street, New Bedford, MA 02740

ii) Chief Executive/Highest Ranking Elected Official:  
Scott W. Lang, Mayor  
phone: (508) 979-1410 fax (508) 991-6189  
email: [scott.lang@newbedford-ma.gov](mailto:scott.lang@newbedford-ma.gov)  
mailing address: 133 William Street, New Bedford, MA 02740

g. Date Submitted: November 28, 2011

h. Project Period: October 1, 2012 to September 30, 2015

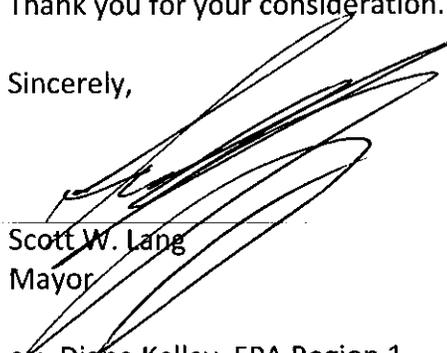
i. Population:

i) general population of City of New Bedford: 95,138

j. The "Special Considerations" Checklist is attached and identifies items that are applicable to this proposal.

Thank you for your consideration.

Sincerely,



Scott W. Lang  
Mayor

cc: Diane Kelley, EPA Region 1

## **1. Community Need**

### **a. *Health, Welfare, and Environment***

#### **i) *Effect of Brownfields on the community***

The City of New Bedford's industrial history has left a legacy of environmental contamination threatening human and environmental health and impeding economic development. New Bedford is burdened with two large and complex Superfund sites. The New Bedford Harbor Superfund site is highly contaminated with PCBs that have jeopardized public health, forced the closure of all harbor fisheries, denied citizens access to this important natural resource, and stymied economic development, especially that associated with port infrastructure maintenance and expansion.

New Bedford is equally challenged by the presence of at least 557 sites where a release of oil or hazardous materials to the environment has occurred, according to the Massachusetts Department of Environmental Protection (MassDEP) database. Of the 557 releases, 81 have not yet achieved a "permanent solution," the final stage in the cleanup process under the state's voluntary cleanup program. Brownfield sites range in size and complexity, from a 10-acre site of a former capacitor manufacturer, so heavily contaminated with PCBs that the building is not usable and is being demolished, to parcels less than one-quarter of an acre where contamination issues are unknown. A majority of sites are concentrated in the City's urban core, which accounts for nearly half of the land area in the City and is home to more than half of its population. However, suburban areas of the City's far north end are also impacted by the presence of Brownfields, including two sites located in the New Bedford Business Park, home to more than 40 businesses employing approximately 4,500 workers.

Contamination and blight from Brownfields sites has the potential to impact the health of residents. In February 2011, Dr. John Levy, a professor at Boston University's School of Public Health, began a three-year study of New Bedford to evaluate trends and patterns of attention deficit hyperactivity disorder (ADHD) and cardiovascular disease. This study will examine risk factors that include exposure to lead and PCBs, both contaminants which are prevalent in New Bedford, as well as family history and socioeconomic status ("BU professor undertakes New Bedford-wide public health study," Dan McDonald, *Standard-Times*, 2/13/11).

Blighted Brownfields also affect the social health of a community and adversely impact property values. Residential property values in urban core communities where most Brownfield sites are located in New Bedford are lower than those suburban areas lacking Brownfield sites. The presence of these sites exacts a toll on community pride.

Certain populations in New Bedford may be particularly sensitive to contamination. According to the 2010 American Community Survey conducted by the U.S. Census Bureau (US Census ACS), 27% of the population of the City consists of women of childbearing age (ages 15 to 50) who gave birth in the last year. Forty-six percent of those women were grouped in the 35-50 year-old category. Studies in New Bedford (Miller, Condon, et al. 1991) and nationally (U.S.

CDC, 2009, Fourth National Report on Human Exposure to Environmental Chemicals) have shown that concentrations of PCBs in blood serum generally increase with age.

The Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA) developed an "Environmental Justice (EJ) Policy" that defines *Environmental Justice Populations*. EOEEA has determined these populations to be most at risk of being unaware of or unable to participate in environmental decision-making or to gain access to state environmental resources.

*Environmental Justice Populations* are defined as neighborhoods (U.S. Census Bureau census block groups) that meet one or more of the following criteria: 1) The median annual household income is at or below 65% of the statewide median income for Massachusetts; 2) 25% of the residents are minority; 3) 25% of the residents are foreign born; 4) 25% of the residents are lacking English language proficiency. The EJ Population maps prepared by EOEEA show the Site is located in an area containing *Environmental Justice Populations*.

The population of New Bedford has historically been and remains diverse. Roughly one half of the population is Portuguese or of Portuguese descent. According to 2010 US Census ACS results, a significant percentage of the City's population are minority:

- 23 percent of the population is "non-white";
- 16.7 percent of the population is comprised of Hispanic or Latino persons;
- 9.6 percent of the population is black (up from 7.8% in 2006).

In summary, New Bedford remains a historically diverse city with a disproportionately high "environmental justice population."

**b. Financial Need**

**i. Economic Impact of Brownfields on New Bedford**

TABLE 1				
	Target Community/ Census Tract	New Bedford	Massachusetts	National
Population	4,137	95,138	6,557,254	309,349,689
Unemployment	(not available)	12.6%	10.2%	6.9%
Poverty Rate (all people)	12.58%	37.1%	11.4%	15.3%
Percent Minority (non-white)	31.11%	22.7%	18.9%	25.8%
Per Capita Income (Median Household)	\$58,244.00 <sup>1</sup>	\$31,616.00	\$62,072.00	\$50,046.00

income)				
<b>Bachelor's Degree</b>	(not available)	9.6%	22.3%	17.7%
<b>Speak English less than "very well" (age 14 and over)</b>	(not available)	9.7%	8.8%	8.7%
<b>Foreign-born</b>		16.0%	15.0%	12.9%
Data is from the U.S. Census Bureau, 2010 American Community Survey Data, and is available at <a href="http://www.census.gov/acs/www/">www.census.gov/acs/www/</a>				
1. 2011 Est. Tract Median Family Income				

New Bedford is largely “built out” with little remaining undeveloped land. Economic development efforts are focused primarily on Brownfield sites. Additional costs and challenges associated with redeveloping Brownfield sites without assistance or incentives put the City at a disadvantage when competing for jobs with other communities. Brownfields account for most of the land available for commercial and industrial development in the City.

The presence of City-owned Brownfields represents lost revenue for the City. Approximately 36 acres of former industrial land is now owned by the City as a result of foreclosure. This represents an estimated loss of over \$184,000 annually, based on City of New Bedford assessment of similar fully developed commercial and industrial properties. Of this foreclosed land, approximately 25 acres have been assessed and are known to be Brownfields, representing an estimated loss of almost \$102,000 annually.

The City’s economy has also been hit especially hard by new rules aimed at regulating commercial fishing. New Bedford is the number one fishing port in the United States. The new regulation system set up last year is creating unprecedented economic losses and threatening the industry. These regulations would have a minor impact on the local economy in communities where commercial fishing is a small component of the local economy. But in New Bedford, where the fleet’s catch is valued at over \$300 million and has a \$1 billion impact on the local economy (New Bedford Master Plan, 2011, Figure 5.4), the impacts will be disastrous. Fish landings in New Bedford plummeted 20% in the last year (Total Commercial Fishery Landings At An Individual U. S. Port For All Years After 1980, NOAA). It is estimated that up to 50% to 75% of the fishing fleet will be lost as a result of the regulations. This year, 56% of Massachusetts’ groundfishing vessels have been inactive, as opposed to 46% last year, representing a significant loss of productivity and profit for many small, independent fishermen (testimony of New Bedford Mayor Scott W. Lang, before the Senate Homeland Security and Governmental Affairs Committee, Subcommittee on Federal Financial Management, Government Information, Federal Services, and International Security, June 20, 2011). As a

result, Massachusetts Governor Deval Patrick has called for a federal disaster declaration and \$21 million in relief assistance.

Manufacturing continues to be a major industry in the Greater New Bedford area; 16% of employment in these 10 towns and cities is in manufacturing, compared to 10% in the state and 12% in the nation. Between the third quarters of 2008 and 2009, manufacturing employment in the Greater New Bedford area declined by 10%<sup>1</sup>. For New Bedford, most, if not all, of these job losses occurred in industries which once filled the City's over 12 million square feet of mill space. Many of these mills, which were once the engines of the City's economy, are now Brownfields sites.

Continued job loss in New Bedford has resulted in lower income and educational attainment levels and high poverty and unemployment rates. According to the 2010 US Census ACS, the median household income of \$31,616 in New Bedford is 51 % of the Massachusetts average of \$62,072 and 63 % of the national average of \$50,046. Over 37 percent of the population of the City has income below the poverty level, compared to 11.4 % for the Commonwealth as a whole.

According to the 2010 US Census ACS, 26.3% of households with children are headed by females in New Bedford. Thirty-four percent of all families with related children under age 18 in New Bedford live below the poverty level, compared to the national average of 17.9% and the state average of 12.8%. In families with a female householder (no husband present), 52.2 % with related children under age 18 live below the poverty level, compared to 34.9% state and 39.6% national. Thirty-five percent of all children under the age of 18 live below the poverty level, over two times the state average of 14% and higher than the national average of 22%.

The number of students who live in low-income households in New Bedford is more than double the state average, according to the Massachusetts Department of Education. The percentage of students in New Bedford who live in low-income households increased from 65.7% in school year 2006 to 71.2% in school year 2010. This compares to a statewide increase over this period from 28.2% to 34.9%.

The City of New Bedford is saddled with chronically high unemployment rates, low educational attainment, and a relatively unskilled labor force. According to the 2010 US Census ACS, New Bedford's unemployment rate was 12.6%, higher than both the Massachusetts average of 10.2% and the national average of 6.9%. The high school dropout rate for the New Bedford School Department was 20.8% in 2010/2011 school year, more than twice the state average of 8.2% (Massachusetts Department of Education). Only 9.6% of the city's 18-and-older population holds at least a bachelor's degree. This figure trails far behind 22% figure for the Commonwealth and 18% nationally.

---

<sup>1</sup> Massachusetts Dept. of Workforce Development Regional Labor Market Information profile (Greater New Bedford), [http://lmi2.detma.org/lmi/pdf/profiles/Gr\\_NewBedford\\_Regional\\_Profile.pdf](http://lmi2.detma.org/lmi/pdf/profiles/Gr_NewBedford_Regional_Profile.pdf), accessed 11/2/11.

New Bedford is defined as an “Economically Distressed Area” (EDA). EDAs are areas that are currently an Economic Target Area or that would otherwise qualify to be an Economic Target Area and receive priority for Brownfields funding awarded by the state. The City is also a Massachusetts “Gateway City”. Gateway Cities have a population between 35,000 and 250,000, with an average household income below the state average and an average educational attainment rate (Bachelor's or above) below the state average. It is one of the 11 cities named in a 2007 report co-authored by the Brookings Institution and the Massachusetts Institute for a New Commonwealth. *Reconnecting Massachusetts Gateway Cities: Lessons Learned and an Agenda for Renewal* revealed how these communities, which all had a legacy of economic success, struggled as the state's economy shifted toward skills-centered knowledge sectors, which increasingly cluster in and around Boston.

The City is moving forward aggressively in its Brownfields efforts with projects that are remaking the City. However, continued progress will require immense resources. Hence, it is imperative that New Bedford receives assistance to cleanup sites being assessed.

## **2. Project Description and Feasibility of Success**

### ***a. Project Description***

#### ***i) conditions of the existing property***

The Site is a vacant parcel of land in a vibrant residential and commercial area. Asphalt and concrete surfaces remain on the northern portion of the Site. A single story building was located on the property and appeared to be a former auto body repair shop. The building was vacant and in poor structural condition. To stabilize the site and facilitate access for Phase II investigation, the City demolished the building in 2011.

Union Street is located north of the Site; facilities along this street include a residence, a church and a medical supply office. Residential properties border the Site to the east, south and west. A school is located northwest of the Site across Union Street.

### ***Proposed or Projected redevelopment***

To maintain compatibility with surrounding neighborhood, the City seeks to redevelop the site for residential use. Portions of the site would be offered to abutting property owners to increase lot sizes and provide more greenspace for residents now living on lots as small as 3,500 square feet.

### ***Previous Activities to Investigate, Secure, Stabilize, and Clean Up the Site***

The Site was the former location of a gasoline filling station and automobile service garage that operated at the Site between 1915 and the late 1970s. The garage building occupied the majority of the area of the Site. Numerous gasoline and fuel oil underground storage tanks (USTs) were historically located at the Site. Information regarding the assessment and closure of the USTs is very limited. A previous investigation performed at the Site in 1992 identified petroleum impacted soil and groundwater above applicable MassDEP release notification criteria. Although a regulatory closure report was submitted to MassDEP for the identified

impacts in 1997, soil and groundwater sampling performed in support of regulatory closure did not include sampling in the area of many of the historic UST locations

In August and September 2010, the City conducted an ASTM Phase I Environmental Site Assessment (ESA) for the Site using EPA Brownfields Assessment Grant funds. The Phase I ESA identified the following Recognized Environmental Concerns (RECs) for the Site: 1) the historic use of the Site as a gasoline filling station and automobile service garage with numerous gasoline and fuel oil USTs; 2) dumped debris, two rusted and corroded fuel oil above ground storage tanks (ASTs), a possible catch basin and automotive lift; and 3) the identification of impacted soil and groundwater at the Site during previous subsurface investigations.

In the spring of 2011, the City conducted Phase II ESA activities using EPA Brownfields Assessment Grant funds. The Phase II ESA evaluated the above RECs and assessed the extent of contamination remaining at the Site. The Phase II ESA included the performance of a geophysical survey, excavation of 9 test pits, advancement of 11 soil borings, and installation of 8 groundwater monitoring wells at the Site. Soil and groundwater samples were collected from the test pits, borings and monitoring wells and submitted for varying analysis including petroleum hydrocarbons, volatile organic compounds metals, and/or polychlorinated biphenyls in accordance with USEPA and MassDEP approved procedures.

Results of the geophysical and test pit investigation did not identify any abandoned underground storage tanks. Soil sample analysis identified petroleum and/or lead impacted soil on the northern and western portions of the Site above applicable MassDEP reportable soil standards and MassDEP direct contact standards for unrestricted Site use. The release was reported to the MassDEP in October 2011. The impacted soils are located in the area of former gasoline and fuel USTs that were located on the northern and western portions of the Site. Analysis of groundwater samples did not identify concentrations above applicable standards.

### ***ii) Proposed Cleanup Plan***

The City proposes remediation of the soil surrounding the former gasoline and fuel oil USTs. Excavation with off-site disposal is an effective way to eliminate risk at the Site, since contamination will be removed and the exposure pathways will no longer exist. Excavation with off-site disposal is moderately difficult to implement. Health-protective measures (e.g., dust suppression and monitoring) during cleanup activities and short-term disturbance to the community (e.g., trucks transporting contaminated soils and backfill) are anticipated. However, ongoing monitoring and maintenance will not be required following excavation and offsite disposal. No restrictions are planned or likely to be necessary following remediation, allowing an unrestricted use of the Site.

## ***b. Budget for EPA Funding, Tracking and Measuring Progress, and Leveraging Other Resources***

### ***i) Budget***

Task 1 – Cooperative Agreement Management and Oversight – The City will maintain

compliance with the Cooperative Agreement for the project. This includes procuring necessary consultant and contractor services, preparing a Community Relations Plan, reporting progress on the project, and maintaining financial records. The City estimates 30 hours of staff time, 18 hours of consultant/contractor costs, plus funds for supplies and travel to accomplish this task.

Task 2 – Report/ Plan Preparation – The City will oversee the preparation of a Quality Assurance Project Plan and status reports required by MassDEP. The City estimates 8 hours of staff time, 60 consultant person hours, plus funds for supplies to complete this task.

Task 3 – Soil Excavation and Disposal – The City will contract with and oversee a qualified contractor to perform soil removal and disposal at an appropriately licensed facility. The work will be performed in accordance with a cleanup plan prepared and submitted to MassDEP. The City will conduct post excavation soil monitoring to demonstrate the completeness of cleanup activities. All excavated areas will be backfilled with certified clean backfill material. Disturbed areas will be stabilized to minimize the potential for erosion. The City estimates 15 hours of staff time for this task. The City will contract for soil excavation, disposal, backfill, stabilization, laboratory services and project oversight.

Task 4 – Post Excavation Monitoring - The City will conduct post excavation groundwater monitoring to demonstrate the completeness of cleanup activities. All required information regarding cleanup and post cleanup activities will be incorporated into final closure documentation sufficient to achieve regulatory closure under the Massachusetts cleanup program. The City estimates 17 hours of staff time, 100 consultant person hours, plus laboratory services and supplies for this task.

Budget Categories	Project Tasks				Budget Category Totals
	Task 1 Cooperative Agreement Oversight	Task 2 Report/Plan Preparation	Task 3 Soil Excavation and Disposal	Task 4 Closeout Reporting	
Personnel	\$1,400.00	\$280.00	\$720.00	\$800.00	\$3,200.00
Fringe Benefits	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Travel	\$600.00	\$0.00	\$0.00	\$0.00	\$600.00
Equipment	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
Supplies	\$200.00	\$100.00	\$0.00	\$100.00	\$400.00
Contractual	\$1,800.00	\$6,000.00	\$175,000.00	\$13,000.00	\$195,800.00
Other (specify)	\$0.00	\$0.00	\$0.00	\$0.00	\$0.00
<b>TOTAL</b>	<b>\$4,000.00</b>	<b>\$6,380.00</b>	<b>\$175,720.00</b>	<b>\$13,900.00</b>	<b>\$200,000.00</b>

***ii) tracking and measuring progress***

The City will track outcomes and outputs of the tasks described in Section 2.b.i. The City will track as “outputs”: the quantity of soil removed and disposed. The City will track as “outcomes”: the construction man hours associated with the cleanup activities; the number of acres made ready for reuse; the area (in square feet) of vacant land converted to green space; the estimated annual tax revenue from the site.

### ***iii) Leveraging***

New Bedford has aggressively sought and built a solid track record of maximizing Brownfields assistance, incentives and investment. The City intends to continue to pursue funding for redevelopment of the Site after cleanup.

The City's Office of Housing and Community Development (OHCD) will play a key role in redevelopment of the Site. The OHCD engages residents, non-profit organizations, developers and the general public in articulating the City's needs and priorities for expanding the stock of safe, decent and affordable housing and revitalizing neighborhoods. OHCD administers federal funding resources helping low and moderate income residents achieve their vision of a healthy and viable community. From individual projects to large-scale development, housing programs administered by the OHCD are funded by an annual entitlement of roughly \$1.3 million from the HOME program geared toward housing low and moderate income populations.

The City is considering redeveloping a portion of the site for infill affordable housing (i.e. development of a vacant lot for affordable housing in an otherwise developed area) for first time home buyers after remediation is complete. One potential option is for the City to use federal HOME funds administered by OHCD to develop residences on the Site. The second option is for the City to issue a Request for Proposals for redevelopment of the Site. The RFP would include restrictive guidelines to ensure the property is developed according to guidelines established by the City.

The City has successfully redeveloped other properties for affordable and first time home buyer programs and has leveraged funding for these projects. Potential sources of funding include the Federal Home Loan Bank funds and Mass Housing, the non profit organization which serves as the State's affordable housing bank.

The City is firmly committed to disposition of portions of the Site to abutters to increase residential lot size and ensuring the redevelopment of the remaining portion of the Site. The City will utilize its past experiences on similar residential infill projects to realize the goal of infill housing development at the Site.

## ***c. Programmatic Capability and Past Performance***

### ***i) Programmatic Capability***

The City has existing staff capable of managing all aspects of the grant, from procurement to oversight of contractors. The City's Environmental Stewardship Department employs a full time Director and a full time Environmental Planner. The Environmental Planner will serve as Project Manager and has extensive experience overseeing environmental consultants and managing complex environmental assessment and remediation projects. The Environmental Stewardship Department also has a full time Administrative Specialist to oversee administrative functions, such as accounts payable, financial reporting and reimbursement requests. The City's full time Chief Procurement Officer is certified as a Massachusetts Certified Public Purchasing Official and has over 12 years of procurement experience in Massachusetts. The Chief Procurement

Officer would manage the procurement of services under this grant. A Grants Auditor in the City's Auditing Department ensures full compliance with the terms of cooperative agreements between the City and granting agencies. The City has extensive experience procuring and overseeing professionals conducting assessment and cleanup under the state's voluntary cleanup program.

The City experiences very little turnover in professional positions. In the event of a vacancy of a key member of the project team, the City maintains up-to-date job descriptions, including requirements for education and professional experience, that are used to advertise vacancies as they become available.

**ii) Adverse Audits**

The City has never received an adverse audit finding for any of the existing grants and has not been required to comply with special "high risk" terms and conditions under EPA regulations.

**iii) Past Performance**

Table 2 summarizes the City's performance on the five most recent EPA Brownfields Grants received.

<b>TABLE 3</b>			
<b>Grant</b>	<b>Project Period</b>	<b>Balance (as of 9/30/11)</b>	<b>Status</b>
Brownfields Assessment Grant (Hazardous Waste)	8/3/2009 to 8/2/2012	\$33,719.10	The City is in compliance with the workplan, schedule, terms and conditions, quarterly and financial status reports, ACRES reporting as well as the reporting requirements of American Recovery and Reinvestment Act. The City has completed one Phase I assessment, two Phase II assessments, used Phase II data to perform a risk assessment at one site, and prepared documentation to close out two sites. Accomplishments have been reported in ACRES and the outputs and outcomes are generally consistent with the workplan.
Brownfield Assessment Grant (Petroleum and Hazardous Waste)	10/1/2008 to 9/30/2011	\$283,167.56	The City is in compliance with the workplan, schedule, terms and conditions, and quarterly and financial status reports. The City has completed a Phase I and Phase II assessment of 480 Union St.; Supplemental Phase II Assessment and Cleanup Planning for Reliable Truss, and Cleanup Planning for Payne Cutlery. The City is currently contracting for additional petroleum and hazardous waste assessment for remaining funds. Accomplishments have been reported in ACRES and the outputs and outcomes are generally consistent with the workplan.
Brownfields Cleanup	10/1/2007 to	\$198,914	The City is in compliance with the workplan, schedule, terms and conditions and quarterly and financial status

Grant - Payne Cutlery	9/30/2010		reports. There have been modifications to the schedule due to the identification by the City's consultant of the need for additional assessment prior to the completing cleanup planning. The change in schedule has been communicated to EPA. The City is planning additional assessment activity and cleanup.
Brownfields Cleanup Grant Reliable Truss	8/1/2004 to 9/30/2009	\$0	The City completed this project in compliance with the workplan, schedule, terms and conditions and quarterly and financial status reports. There were modifications to the schedule due to the identification by the City's consultant of the need for additional assessment prior to the completing cleanup planning and the change in schedule was communicated to EPA. Cleanup was completed and a park is currently under construction at the site.
Brownfields Assessment Grant (Petroleum and Hazardous Substances)	10/1/2003 to 9/30/ 2008	\$0	The City completed the grant in compliance with the workplan, schedule, terms and conditions and quarterly and financial status reports. The City completed the assessments included in the workplan. Of the properties assessed: two were sold; one was redeveloped into a ball field; two were redeveloped for commercial use; one was prepared for cleanup and one still requires additional assessment.

**3. Community Engagement and Partnerships**

***a. plan for involving the affected community and communicating progress***

To provide opportunities for broad public involvement for this project, the City will conduct comprehensive community outreach.

Brownfields stakeholders in New Bedford have formed the Brownfields Task Force. Coordinated by the City of New Bedford and the New Bedford Economic Development Corporation (NBEDC), the Brownfields Task Force is made up of business, community, Brownfields redevelopment, economic development and City representatives. The Brownfields Task Force focused on identifying key sites in New Bedford for assessment, cleanup and subsequent redevelopment. The Task Force held two public meetings in 2010 to select sites, including the 480 Union Street site, for assessment. It is planning to meet again in December 2011 to review site assessment progress and identify next steps.

The City works closely with its economic development partner, NBEDC, on Brownfields redevelopment projects. NBEDC has been a leader in preparing four requests for proposals for redevelopment of Brownfield sites and actively pursues leads.

The City sought input from residents of the target area regarding the residential use. A portion of the site was previously zoned commercial. The City proposed a zoning change to rezone the

property as Residence B, which is consistent with abutting uses and zoning. The zoning change was heard at publicly advertised meetings of the Planning Board, City Council Ordinance Committee and the New Bedford City Council. Proponents of the residential use included neighborhood residents and abutters, who were recorded as in favor of the residential use.

In the project area, the City will continue to perform community outreach to describe proposed cleanup activities, solicit public comment, and communicate progress. The City plans to use neighborhood and community groups to assist with this effort. These groups will be responsible for assisting with the organization and outreach for public meetings, and disseminating information about cleanup.

The City will report progress at key milestones to stakeholders. Summary reports will be translated into multiple languages and distributed. Meetings to describe the proposed cleanup activities and results of the activities will be held in the evenings at locations that are accessible by public transportation. Notice of the meetings will be published in local English, Portuguese, and Cape Verdean newspapers. Use of these local newspapers will help ensure that the City maximizes notification to its diverse population. Based on 2000 U.S. Census data, roughly one half of the population of New Bedford is Portuguese or of Portuguese descent. *El Latino Expreso*, a Spanish newspaper that was previously circulated in New Bedford, was discontinued in 2010.

The City recently began using social media (Facebook, Twitter and YouTube) to communicate information to subscribers. On our newly launched Facebook page, we have 145 followers, 175 monthly active users, and over 23,000 total post views. On Twitter, we have 65 followers, many of which are organizations representing larger constituencies. Overall, we see social media as a way to reach underrepresented constituencies, based on research presented in a Pew Research Center report in 2010. Social media is proving to be an effective tool for reaching segments of the population that may not be reached through other outreach methods.

***b. efforts and/or plans to develop partnerships with local/state health agencies***

The City's Department of Health plays an important role in Brownfields cleanup and redevelopment projects. With oversight from its three-member board, the Health Director has been involved in a major Brownfields assessment and cleanup project and petitioned the Massachusetts Department of Public Health (MDPH) to undertake serum testing in response to public concern over exposures at a property in the City. The MDPH's involvement in the serum testing at this site has led to their review of other assessment activities to ensure adequate public health protection. This relationship with DPH and their interest in New Bedford projects will be beneficial to this cleanup project.

The City's organizational structure allows for Health Department input, through its Director, at any phase of redevelopment planning. The City has adopted a formal site plan review process by which developers must submit redevelopment plans for review by various City departments. The Health Department is notified of all applications for site plan review and provides input and

comments on projects. Ultimately, the Health Department must issue its approval on building and occupancy permit applications prior to the issuance of a permit.

The project is consistent with the City's Mass in Motion project, a public-private partnership between the MDPH and the City of New Bedford (currently housed at the New Bedford Health Department). The project's primary focus is reducing childhood obesity through numerous policy, systems and environmental strategies (in schools, worksites, health centers and the community-at-large). Development in areas of the City which provide residents pedestrian access to work and service opportunities are included in New Bedford Mass in Motion's Community Action Plan in an effort to raise awareness of environmental changes needed for healthier communities.

As a recipient of Brownfields Job Training Grant, the City plans to continue its partnership with New Directions and Bristol Community College (BCC) on this project. From 2009-2011, BCC was contracted by the City to offer job training programs using the City's Brownfields Job Training Grant. Twenty participants graduated from OSHA 40-hour (HAZWOPER) certification classes offered at BCC during the grant period. Nineteen participants completed OSHA 30-hour (Supervisory level) training, and 12 participants completed OSHA 10-hour training. All graduates were assigned an Employment Specialist at New Directions, and 21 obtained at least part-time employment at an average hourly wage of \$14.84 (*Brownfields Job Training Cooperative Agreement Final Technical Report*, Michael Travers, Sept. 2011). The City intends to continue to work with New Directions to promote the hiring of local workers on Brownfields sites as part of future Requests for Proposals.

New Bedford has developed partnerships with MassDEP on several Brownfields redevelopment projects. These have been the foundation of partnerships with other state agencies (MassDevelopment, Attorney General's Office, Department of Housing and Community Development) that have played a role in past Brownfield redevelopment efforts. The City anticipates ongoing involvement from all of its partners in future efforts, including site selection and redevelopment.

***c. description of, and role of, the key community-based organizations***

The City's key partners and their role are described below. Letters affirming their roles are included in Attachment iii).

The **New Bedford Economic Development Council, Inc.** (NBEDC) is a 501c3 organization governed by a nine-member board of directors and consists of 250 successful leaders in the community, business, academia and government. NBEDC helps facilitate the Brownfields Task Force and will support the City's efforts to communicate about the project and seek input from the community.

For over a decade, **Old Bedford Village Development Corp.** has advocated for the assessment, cleanup and redevelopment of Brownfields, including the Morse Cutting Tools site. As a result,

their group has extensive experience conducting meetings and community outreach regarding Brownfields assessment, cleanup and reuse. Old Bedford Village Development would provide the City with a conduit to neighborhood residents, would help sponsor meetings regarding sites in the targeted neighborhood, and assist with education and outreach.

The **Inter-Church Council of Greater New Bedford (ICC)** consists of member congregations, 22 of which are located in New Bedford and 14 within two miles of the Site. ICC has committed to assisting with project outreach by working with member congregations to include informational notices in bulletins and promote community involvement in the project.

#### **4. Project Benefits**

##### ***a. Welfare and/or Public Health***

The project will provide significant health, environmental and economic benefits to the City. Cleanup of the site will reduce the potential for health impacts resulting from potential exposure to contamination remaining on the site. The potential for exposure is minimal to neighbors and trespassers since contamination is at depth. However, the proposed residential use and resulting site development will likely require grading and excavation, increasing exposure potential for construction workers and neighbors.

During cleanup, work will be conducted to protect public health and safety. Dust suppression and monitoring will be utilized to ensure no impact to neighbors as a result of the cleanup work. All materials excavated will be transported in compliance with applicable transportation requirements for the material to appropriately permitted disposal facilities. Trucks will be required to follow a prescribed haul route to major highways to transport material to disposal sites or deliver clean material for backfill. All disturbed areas will be stabilized to prevent the potential for erosion or dust.

The proposed redevelopment will integrate equitable development by making portions of the site available to Site abutters through the City's "Abutters Lots Program". Under the program, abutters will have the opportunity to submit proposals to the City to acquire and reuse a portion of the site abutting their property. A City selection committee will review proposals and make determinations based on the highest and best use of the property. The land will then be transferred to the successful proposer at significantly reduced rate.

##### ***b. Economic Benefits and/or Greenspace***

###### ***i) Economic Benefits***

The cleanup will return vacant, underutilized land back into productive and sustainable use. Redevelopment reduces the tax burden on City residents and the strain on City resources that results from vacant and underutilized properties, which are generally an attractive nuisance for vagrancy, vandalism and dumping. In addition, redevelopment will generate additional tax revenue.

The City has sought to use Brownfields redevelopment as a tool for boosting property values.

One example is the renovation of the Ropeworks building on Sawyer Street into an artist condominium live/work space, which has increased the property value from \$274,600 to \$2,720,600 (*City of New Bedford Historic Mill Inventory 2008*).

***ii) non-economic benefits for greenspace or other not-for-profit activities***

Cleanup funding will transform the site from one that is largely occupied by pavement or brick into greenspace for residential use. The project has the potential to increase at least five small lots (ranging in size from approximately 3,100 square feet to 5,700 square feet) in a very densely developed area of multifamily homes by as much as 1700 square feet. This creates opportunities for gardens and other greenspace which is often not feasible in densely developed areas of the City.

In addition, the cleanup creates an opportunity for new multifamily residential development on a newly created 10,000 square foot lot. The size of the lot will allow for adequate greenspace despite the multifamily use.

***c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse***

Cleanup and redevelopment of a site in a densely developed, predominantly residential area for residential use embodies sustainable development. New Bedford is heavily urbanized and the site is serviced by existing infrastructure, including water, sewer, electric, gas, telephone and cable, roads and public transit. Redevelopment in urban areas capitalizes on investments already made in infrastructure, and reduces the impacts and costs that result from constructing new infrastructure in undeveloped areas. The Site is easily accessible to all amenities (grocery, medical, health clubs, employment centers, major parks) and is within walking distance (less than ¼ mile) from downtown New Bedford, home to 626 business establishments, employing 6,214 workers and generating approximately \$500 million in annual sales. Redevelopment will provide opportunities for residents to live where they work, shop, eat and play.

The City has sought to incorporate innovative stormwater management into Brownfields redevelopment. The City requires that post development runoff from new developments be managed on-site and not result in any increase in off-site runoff. This approach would be incorporated into planning and design for reuse of this site.

The City has continuously sought to beneficially reuse material from Brownfield redevelopment sites and minimize the amount of material managed off-site. In general, the City seeks to beneficially reuse contaminated material, processed asphalt, brick and concrete from Brownfields redevelopment. For example, the City often works with a regional lined landfill to reuse moderately contaminated soil for cover material in accordance with a MassDEP policy. It is anticipated that some of the soil from this project will be suitable for disposal in this lined landfill. Using contaminated soil for cover instead of disposing of it in a landfill increases the life of the landfill and reduces the need to purchase cover material.

## ***Attachment i)***

### **Threshold Documentation (Section III.B and C of Guidelines)**

#### ***III.B. Site Eligibility***

1. *Basic Site Definition*  
The Site meets the definitions of Brownfields Site under CERCLA §104(k).
2. *Property Specific Determination*  
The Site does not require a Property Specific Determination
3. *Hazardous Substances, CERCLA Liability and Demonstration of Bona Fide Prospective Purchaser*  
The Site is not known to be contaminated by hazardous substances
4. *Petroleum Site Eligibility*  
The MassDEP Petroleum Site Eligibility Determination is contained in Attachment x).

#### ***III.C. Threshold Criteria for Cleanup Grants***

1. *Applicant Eligibility*
  - a. *Eligible Entity*  
The applicant is a municipality and is an eligible applicant
  - b. *Site Ownership*  
The City acquired ownership of the property through tax foreclosure process on July 31, 2008.
2. *Letter from State or Tribal Authority*  
A letter from the Massachusetts Department of Environmental Protection acknowledging that the City intends to conduct cleanup activities and apply for a federal grant is contained in Attachment ii).
3. *Site Eligibility and Property Ownership Eligibility*
  - a. *Basic Site Information:*
    - (a) *Name of Site:* 478 to 480 Union Street
    - (b) *Address of Site (including zip code):* 478 to 480 Union Street, New Bedford, MA 02740
    - (c) *Current Owner of Site:* City of New Bedford
    - (d) *If you are not the current owner, date you plan to acquire ownership:* N/A
  - b. *Status and History of Contamination at the Site*
    - (a) *Whether site is contaminated by petroleum or hazardous substances:* Site is contaminated by petroleum
    - (b) *Operational history and current use(s):* The Site was the former location of a gasoline filling station and automobile service garage that operated at the Site between 1915 and the late 1970's. The garage building occupied the majority of the area of the Site. The Site is currently vacant.
    - (c) *Environmental concerns, if known:* 1) the historic use of the Site as a gasoline filling station and automobile service garage with numerous gasoline and fuel oil USTs; 2) dumped debris, two rusted and corroded fuel oil above ground storage tanks (ASTs), a possible catch basin and automotive lift; and 3) the identification of impacted soil and groundwater at the Site during previous subsurface investigations.

- (d) *How the site became contaminated/ nature and extent of contamination:* Numerous gasoline and fuel oil underground storage tanks (USTs) were historically located at the Site. Soil sample analysis identified petroleum and/or lead impacted soil on the northern and western portions of the Site above applicable MassDEP reportable soil standards and MassDEP direct contact standards for unrestricted Site use. The impacted soils are located in the area of former gasoline and fuel USTs that were located on the northern and western portions of the Site. Analysis of groundwater samples did not identify concentrations above applicable standards.
- c. *Sites ineligible for funding.*
- (a) The Site is not listed or proposed for listing on the National Priorities List
- (b) The Site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA not subject to the jurisdiction, custody, or control of the United States government.
- d. *Sites Requiring a Property-Specific Determination.* The Site does not require a Property Specific Determination.
- e. *Environmental Assessment Required for Cleanup Proposals*  
The following reports have been prepared for the Site:
- previous investigation performed at the Site in 1992
  - Phase I and Phase II Environmental Site Assessment (ESA), 478 - 480 Union Street New Bedford, MA August 2011

---

#### *Property Ownership Eligibility*

- f. Not applicable to Petroleum Cleanup Grant
- g. Not applicable to Petroleum Cleanup Grant
- h. Not applicable to Petroleum Cleanup Grant
- i. *Petroleum Sites*
- i) *Current and Immediate Past Owners*  
The City of New Bedford is the current owner. The immediate past owners of the Site were George M. and Karen M. Martins.
- ii) *Acquisition of Site*  
The City acquired the Site through the tax foreclosure process on July 31, 2008.
- iii) *No Responsible Party for the Site*
- (1) The City of New Bedford (current owner) and the immediate past owner did not dispense or dispose of petroleum or petroleum product contamination, or exacerbate the existing petroleum contamination at the site.
- (2) The City of New Bedford (current owner) or the immediate past owner did not own the site when any dispensing or disposal of petroleum (by others) took place
- (3) The City of New Bedford (current owner) or the immediate past owner took reasonable steps with regard to contamination.

- iv) *Cleaned Up by a Person Not Potentially Liable*  
The City of New Bedford did not dispense or dispose of petroleum or petroleum product, or exacerbate the existing petroleum contamination at the site, and has taken reasonable steps with regard to the contamination at the site.
- v) *Relatively Low Risk*  
The Site is a "relatively low risk" site as defined by the EPA. This location is not currently being assessed or cleaned up using Leaking Underground Storage Tank (LUST) funds, nor is it subject to a response under the Oil Pollution Act.
- vi) *Judgments, Orders, or Third Party Suits*  
No responsible party (including the City of New Bedford) is identified for the Site through, either:
- A judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or
  - An enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the site; or
  - A citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.
- vii) *Subject to RCRA*  
The site is not subject to any order under section 9003(h) of the Solid Waste Disposal Act.
- viii) *Financial Viability of Responsible Parties*  
The City of New Bedford (current owner) or immediate past owners have not been identified as responsible for the contamination at the site. In addition, the immediate past owners are not likely to have the financial capability to satisfy any obligations they may have under federal or state law to assess, investigate, or clean up the site, since they were unable to pay real estate taxes for the Site.

#### 4. *Cleanup Authority and Oversight Structure*

Please note that you will be required to comply with all applicable federal and state laws and ensure that the cleanup protects human health and the environment.

a. *Describe how you will oversee the cleanup at the site.*

The cleanup will be overseen by a State of Massachusetts Licensed Site Professional (LSP) under the guidelines of Massachusetts' response program, the Massachusetts Contingency Plan (MCP): 310 CMR 40.0000. The City will use procurement procedures which reflect applicable Massachusetts laws and regulations, provided that the procurements conform to applicable federal law and standards, to ensure that any needed technical expertise is in place prior to beginning cleanup activities.

b. *Plan to acquire access to neighboring properties, if necessary*

Access to neighboring properties to conduct cleanup is not anticipated.

#### 5. *Cost Share*

a. *Statutory Cost Share*

- i) The City is requesting a hardship waiver of the cost share.
- ii) The "Hardship Waiver Request" is submitted as a separate Attachment viii).

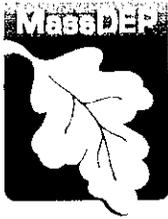
6. *Community Notification*

- A copy of the draft ABCA is contained in Attachment v).
- A copy of the ad and screen shot of the City's website demonstrating notification to the public and solicitation for comments on the proposal is contained in Attachment iv).
- A summary of the public meeting, comments received, and response to comments is contained in Attachment iv)

***ATTACHMENT ii)***

***Letter from state environmental authority (Massachusetts Department of Environmental Protection) – (Section III.C.2 of Guidelines)***

---



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

# Department of Environmental Protection

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

LEVA PATRICK  
Secretary

RICHARD K. SULLIVAN, Jr.  
Secretary

EMILY M. LAW  
Executive Director

KENNETH J. SMELL  
Coordinator

November 24, 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 New Bedford Application for EPA Cleanup Grant Funds*

Dear Mr. West:

I am writing to support the proposal submitted by the City of New Bedford under the Fiscal Year 2012 U.S. Department of Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program for petroleum cleanup at 478 to 480 Union Street. The City intends to use grant funds to remediate the petroleum contaminated soil surrounding the former gasoline and fuel oil underground storage tanks (USTs) via excavation and offsite disposal. Ongoing monitoring and maintenance will not be required following excavation and offsite disposal and no restrictions are planned or likely to be necessary following remediation, allowing an unrestricted use of the Site. To maintain compatibility with the surrounding neighborhood, the City seeks to redevelop the site for residential use. Portions of the site would be offered to abutting property owners to increase lot sizes and provide more greenspace for residents now living on lots as small as 3,500 square feet.

In Massachusetts our state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking brownfield projects have access to available incentives. The Massachusetts Department of Environmental Protection (MassDEP), through our regional offices, provides technical support to brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to provide the support to the City that will be needed to help make this project a success.

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

Sincerely,

Kerry Bowie  
MassDEP Brownfields Coordinator

Cc: Scott Lang, Mayor, City of New Bedford, 133 William Street, New Bedford, MA 02740  
Scott Alfonse, Department of Environmental Stewardship, City of New Bedford, Room 304  
Gerard Martin, MassDEP Central Regional Office

**ATTACHMENT iii)**

***Letters of Support from Community Based Organizations (Section V.B.3 of Guidelines***

New Bedford Economic Development Council  
Uniting New Bedford's economic strengths

1213 Purchase Street  
3rd Floor  
New Bedford, MA 02740  
www.nbedc.org

---

November 21, 2011

Mr. Scott Alfonse  
City of New Bedford  
Dept. of Environmental Stewardship  
133 William Street  
New Bedford, MA 02740

**RE: City of New Bedford Brownfields Cleanup Grant Proposal for 478 – 480 Union Street**

Dear Mr. Alfonse:

On behalf of the New Bedford Economic Development Council, I am expressing our support for the Brownfields Cleanup Grant Proposal for 478 – 480 Union Street submitted by the City of New Bedford.

The New Bedford Economic Development Council (NBEDC) is a 501c3 organization governed by a nine-member board of directors and consists of a 250 successful leaders in the community, business, academia and government. In conjunction with the Mayor's Office, the NBEDC guides the agenda for the city's strategic economic development growth.

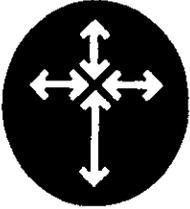
Our efforts to promote New Bedford to new and existing companies as a location for business growth and expansion are often focused on Brownfields. We work closely with the City to identify Brownfields and characterize site conditions to determine the best opportunities for reuse. The results of this Brownfields partnership include the successful redevelopment of the former Fairhaven Mills into a retail destination, and the redevelopment of former industrial mills into light manufacturing and housing.

The NBEDC can provide financial assistance and tax incentive packages to promote redevelopment at the site once cleanup is complete. We also facilitate introductions to other federal, state and local support agencies, and provide technical assistance for project development. These services can provide critical assistance for future redevelopment of 478-480 Union Street.

Cleanup will help transform a blighted site surrounded by residential use into an opportunity for residents to live within walking distance to employment opportunities and services. The NBEDC strongly supports the City's application for the Brownfields Cleanup Grant for this site.

Sincerely,

  
Matt Morrissey  
Executive Director



## Inter-Church Council of Greater New Bedford

---

412 County Street ✦ New Bedford MA ✦ 02740  
508-993-6242 ✦ 508-991-3158 facsimile  
Web-Site: [www.iccgnb.org](http://www.iccgnb.org)  
E-Mail: [Connie@iccgnb.org](mailto:Connie@iccgnb.org)

Mr. Scott Alfonse  
City of New Bedford  
Department of Environmental Stewardship  
133 William Street, Room 304  
New Bedford, MA 02740

November 18, 2011

Dear Scott,

I am writing on behalf of the Inter-Church Council of Greater New Bedford (ICC) to express ICC's support of the City of New Bedford's application to EPA for a Brownfields Cleanup Grant.

The mission of the ICC is to promote Christian unity through a common ministry of loving service, public witness, and building community. Twenty-two of the ICC's 47 member congregations are located throughout New Bedford; 14 churches are within 2 miles of 478-480 Union Street. The ICC would welcome the opportunity to support New Bedford's Brownfields program by including meeting or other Brownfields-related announcements in our weekly e-newsletter. We can also contact specific churches on behalf of the City to ask if they would be willing to include an insert about Brownfields activities in their Sunday bulletin to promote better awareness of public engagement activities regarding Brownfields identification and cleanup. We are confident that redeveloping these properties will provide tangible benefits not only to immediate neighbors but also to all community members.

The ICC supports the City's efforts to secure funding to clean up these properties, and looks forward to working with the City to promote community engagement in the remediation and redevelopment of Brownfields in New Bedford.

Sincerely,

Rev. David A. Lima  
Executive Minister

Old Bedford Village Development, Inc.  
181 Hillman Street Bld. 9 Room 109  
P. O. Box 7559  
New Bedford, Ma. 02740

November 25, 2011

Mr. Scott Alfonse  
City of New Bedford  
Department of Environmental Stewardship  
133 William Street  
New Bedford, MA 02740

Dear Scott:

Please accept this letter of support from the Old Bedford Village Development Corporation for application to EPA for a Brownfields Cleanup Grant for 480 Union Street.

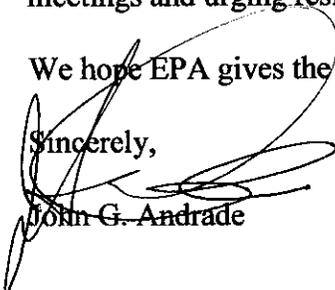
Old Bedford Village Development Corporation's involvement with Brownfields in New Bedford dates back over a decade to its efforts to force the demolition and cleanup of Morse Cutting Tools. During that time, we have often disagreed with local, state and federal officials and responsible parties about the process and schedule. However, we continued to work towards our goal of a clean Morse site. Today, we are close to realizing our goal.

Our role throughout this process has been to educate, facilitate and advocate for economic opportunities for people in the south central community, as well as in other communities impacted by Brownfields. Our organization is one of the most visible and most vocal when it comes to advocating for Brownfields assessment, cleanup and redevelopment, while creating employment opportunities during and after these processes are complete.

Our organization's experience with Morse is being put to use at other sites in New Bedford. We have taken an active role in discussions about the cleanup of New Bedford Harbor Superfund. If New Bedford is successful in its application to EPA, we anticipate assisting the City with education and outreach efforts regarding cleanup. We would apply the same techniques as we did with Morse, organizing and promoting public meetings and urging residents to play a role in the process.

We hope EPA gives the City's application careful consideration.

Sincerely,

  
John G. Andrade

## **ATTACHMENT iv)**

### ***Documentation of community notification, copies of ads, comments received, responses, meeting notes, sign in sheet (Section III.C.6 of Guidelines)***

#### Summary from the public meeting and comments received

The City scheduled a public meeting on November 14, 2011 from at 6:30 p.m. to 8:00 p.m. at the Main Branch of the New Bedford Public Library, 613 Pleasant Street, New Bedford, MA to present an overview of the application and to receive questions or comments. The meeting began at approximately 6:35 p.m. In attendance were the Director and an Environmental Planner from the City of New Bedford Department of Environmental Stewardship, and three members of the general public. City staff presented a brief overview of assessment performed to date, findings of the assessment, alternatives for cleanup, the preferred alternative, and instructions on how to comment on the City's proposal. A hard copy of the instructions was also provided to attendees. The City staff then opened the meeting to questions and comments. The following **questions and/or comments** were received.

- The proposal should include information about how the City plans to create employment opportunities for local residents, local qualified contractors and trainees of the City's Brownfield Job Training grant program.
- The 480 Union Street Cleanup proposal includes information about how the City plans to leverage other resources for funding. The City proposes a residential use at the site. Some of the proposed resources may not be applicable for residential redevelopment. The City should explore other opportunities for funding, including Mass Housing.

Without there being any further questions, the meeting ended at 7:20 p.m.

#### Other comments

In addition to comments received at the meeting, the City received the following comment:

- New Jersey Institute of Technology provides technical assistance to communities on Brownfields issues. City should look into this program.

#### Response to Comments

The City intends to follow applicable procurement requirements for consultants and contractors for the project. Requests for Proposals and/ or Invitation for Bids will be published in local newspapers. The City has a local hiring goal that is included in Invitation for Bids. The City's final proposal to EPA states that the City intends to work with New Directions, the City's job training agency, to notify trainees about employment opportunities on the project.

The City's final proposal does not include potential funding resources that are not applicable to residential redevelopment. The final proposal states that Mass Housing is one of the potential funding sources being considered for residential redevelopment.

If the project is funded, the City will contact New Jersey Institute of Technology to see what assistance may be available or provided on the project.



**City of New Bedford  
Notice of Intent to Apply for a  
US EPA Brownfields Cleanup Grants**

The City of New Bedford intends to submit proposals for US Environmental Protection Agency Brownfields Cleanup Grants to conduct environmental cleanup activities at the following locations:

- 480 Union Street
- North Side (rear) Manomet Street (Map 105 Lots 208 and 209)(behind former Cliftex building)

Draft proposals, which include a general description of cleanup alternatives to be considered if the projects are funded, are available for public review and comment **beginning on November 9, 2011**. The draft proposals are available on the City of New Bedford Environmental Stewardship website at

<http://www.newbedford-ma.gov/Environmental/EnvironmentalStewardshipMain.html>

Click on the link to DRAFT Brownfields Cleanup Grant Applications. A hard copy of the proposals are available for review at the City's Environmental Stewardship Department, City Hall Room 304, 133 William Street, New Bedford, MA, Monday through Friday between 8:00 a.m. and 4:00 p.m.

The City will hold a **public meeting on November 14, 2011 from at 6:30 p.m. to 8:00 p.m. at the Main Branch of the New Bedford Public Library, 613 Pleasant Street, New Bedford, MA** to present an overview of the applications and to receive questions or comments. The City will accept comments on the draft applications **until 4:00 p.m. on November 21, 2010**. Comments should be submitted in writing to the City's Environmental Stewardship Department, 133 William Street, New Bedford, MA 02740 or by email to: [scott.alfonse@newbedford-ma.gov](mailto:scott.alfonse@newbedford-ma.gov)

Environmental Stewardship  
 City Hall, Room 203  
 133 William Street  
 New Bedford, MA 02740

Tel: 508-991-6188  
 Fax: 508-961-3045  
 Business Hours: 8:00 am - 4:00 pm



Environmental Stewardship

Our Dept. | Site Assessment & Cleanup Projects | Recycling | Links

Department Head: **Scott Alfonse**  
 Director  
 Wed, November 16, 2011

Created in 2003, the Office of Environmental Stewardship is responsible for maintaining the City's compliance with environmental laws and regulations, and administering the Wetlands Protection Act and wetlands regulations.

Department Staff  
 Sarah Porter, Conservation Agent  
 Sandy Douglas, Administrative Specialist  
 Cheryl Henlin, Environmental Planner

Conservation Commission  
 John P. Gurney, Chairman  
 Dr. Bonita Cade  
 Kenneth Motta  
 Robert Morris  
 John Radcliffe

Energy Office  
 Scott Durkee, Energy Director

**Brownfields Cleanup Grant DRAFT Applications Available for Public Comment**

The City of New Bedford intends to submit proposals for US Environmental Protection Agency Brownfields Cleanup Grants to conduct environmental cleanup activities at 480 Union Street and the North Side (rear) Manomet Street (Map 105 Lots 208 and 209)(behind former Cliftex building). Draft proposals, which includes a general description of cleanup alternatives to be considered if the projects are funded, are available for public review and comment.

The City will hold a public meeting on **November 14, 2011 from at 6:30 p.m. to 8:00 p.m. at the Main Branch of the New Bedford Public Library, 613 Pleasant Street, New Bedford, MA** to present an overview of the applications and to receive questions or comments. The City will accept comments on the draft applications **until 4:00 p.m. on November 21, 2011**. Comments should be submitted in writing to the City's Environmental Stewardship Department, 133 William Street, New Bedford, MA-02740 or by email to: [scott.alfonse@newbedford-ma.gov](mailto:scott.alfonse@newbedford-ma.gov)

- \* Brownfields Cleanup Grant DRAFT Application - 480 Union Street
- \* Brownfields Cleanup Grant DRAFT Application - North Side (rear) Manomet Street (Map 105 Lots 208 and 209)(behind former Cliftex building)

Conservation Forms

Administrative Checklist



New Bedford Wetland Photo Contest - [click here for more info](#)

Conservation Commission and Coastal Zone Management

- \* Introduction to No Adverse Impact Land Management in the Coastal Zone
- \* Raise your Home, Lower your monthly payments - Protect buildings and reduce monthly expenses with freeboard
- \* Landscaping to protect your coastal property from storm damage and flooding

City of New Bedford Wetlands Ordinance

- \* City of New Bedford Wetlands Ordinance

The Massachusetts Wetlands Protection Act

- \* How it Protects Our Wetlands, Floorplains and Riverfront Areas

Asian Longhorned Beetle

- \* Asian Longhorned Beetle Information

Sassaquin Pond:

PUBLIC MEETING SIGN IN SHEET

City of New Bedford

Brownfields Cleanup Grant Proposals for 480 Union Street and Map 105 Lots 208 and 209

November 14, 2011

NAME	ADDRESS	Email
OSVDC John C. Andrade	151 Hillman St	OSVDC@yahoo.com
M. Frazier	615 Parkside Hilltop	KFRauktion@FrankCopp.com

**ATTACHMENT v)**

***Analysis of Brownfields Cleanup Alternative (Section III.C.6 of Guidelines)***

**Former Gasoline and Service Station Site  
478-480 Union Street, New Bedford, MA  
MADEP Release Tracking Number (RTN): 4-23596**

**I. Introduction & Background**

**a. Site Location**

The site is located at 478-480 Union Street in the City of New Bedford, Massachusetts (herein referred to as "the Site").

**b. Previous Site Use(s) and any previous cleanup/remediation**

The Site was the former location of a gasoline filling station and automobile service garage that operated at the Site between 1915 and the late 1970s. The garage building occupied the majority of the area of the Site. Numerous gasoline and fuel oil underground storage tanks (USTs) were historically located at the Site. Information regarding the assessment and closure of the USTs is very limited. A previous investigation performed at the Site in 1992 identified petroleum impacted soil and groundwater above applicable Massachusetts Department of Environmental Protection (MADEP) release notification criteria. The release was subsequently reported to the MADEP and RTN 4-1265 was assigned to the Site. Although a regulatory closure report was submitted for the identified impacts in 1997 and RTN 4-1265. Soil and groundwater sampling performed in support of regulatory closure did not include sampling in the area of many of the historic UST locations.

**c. Site Assessment Findings**

In July 2010, the City hired Weston & Sampson Engineers to conduct an ASTM Phase I Environmental Site Assessment (ESA) for the Site. The assessment was performed in August and September 2010. The Phase I ESA identified the following Recognized Environmental Concerns (RECs) for the Site: 1) the historic use of the Site as a gasoline filling station and automobile service garage with numerous gasoline and fuel oil USTs; 2) dumped debris, two rusted and corroded fuel oil above ground storage tanks (ASTs), a possible catch basin and automotive lift; and 3) the identification of impacted soil and groundwater at the Site during previous subsurface investigations.

In the spring of 2011, Weston & Sampson conducted Phase II ESA activities to evaluate the above RECs and to assess the extent of contamination remaining at the Site. The Phase II ESA included the performance of a geophysical survey, excavation of 9 test pits, advancement of 11 soil borings, and installation of 8 groundwater monitoring wells at the Site. Soil and groundwater samples were collected from the test pits, borings and monitoring wells and submitted for varying analysis including petroleum hydrocarbons, volatile organic compounds

metals, and/or polychlorinated biphenyls in accordance with USEPA and MADEP approved procedures.

Results of the geophysical and test pit investigation did not identify any abandoned USTs. Soil sample analysis identified petroleum and/or lead impacted soil on the northern and western portions of the Site above applicable MADEP reportable soil standards and MADEP direct contact standards for unrestricted Site use. The release was reported to the MADEP in October 2011 and RTN 4-23596 was assigned to the Site. The impacted soils are located in the area of former gasoline and fuel USTs that were located on the northern and western portions of the Site. Analysis of groundwater samples did not identify concentrations above applicable standards.

#### **d. Project Goal**

The planned reuse for the Site is residential development. The Site is zoned for residential use.

## **II. Applicable Regulations and Cleanup Standards**

### **a. Cleanup Oversight Responsibility**

The cleanup will be overseen by a State of Massachusetts Licensed Site Professional (LSP) under the guidelines of the Massachusetts Contingency Plan (MCP): 310 CMR 40.0000. It is expected that remedial cleanup will be performed under a Release Abatement Measure (RAM) Plan. In addition, required regulatory documents prepared for this Site will be submitted to the MADEP electronically and tracked under RTN 4-23596.

### **b. Cleanup Standards for major contaminants**

As residential use is planned for the Site and in order to avoid the need for any use restrictions, the MADEP standards for unrestricted use will be used as the cleanup standards. However, it is possible that Site specific risk-based cleanup standards may be generated for compounds of concern, in accordance with state regulations.

### **c. Laws & Regulations Applicable to the Cleanup**

Laws and regulations that are applicable to this cleanup include the Federal Small Business Liability Relief and Brownfields Revitalization Act, the Federal Davis-Bacon Act, the Massachusetts Contingency Plan (MCP), and City by-laws. Federal, state, and local laws regarding procurement of contractors to conduct the cleanup will be followed.

In addition, all appropriate permits (*e.g.*, notify before you dig, soil transport/disposal manifests) will be obtained prior to the work commencing.

## **III. Evaluation of Cleanup Alternatives**

### **a. Cleanup Alternatives Considered**

To address contamination at the Site, three different alternatives were considered, including Alternative #1: No Action; Alternative #2: Air Sparging (AS) / Soil Vapor Extraction (SVE); and Alternative #3: Excavation with Off-Site Disposal.

## **b. Cost Estimate of Cleanup Alternatives**

To satisfy EPA requirements, the effectiveness, implementability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

### Effectiveness

- Alternative #1: No Action is not effective in controlling or preventing the exposure of receptors to contamination at the Site.
- Alternative #2: AS / SVE is an effective remedial technology for gasoline and fuel oil UST release sites and if implemented at the Site, could be successful in reducing concentration to below unrestricted use direct contact standards. However, the remediation of the Site utilizing AS / SVE could take years and may not be very effective due to Site geology and the location of impacted soils beneath the water table.
- Alternative #3: Excavation with Off-Site Disposal is an effective way to eliminate risk at the Site, since contamination will be removed and the exposure pathways will no longer exist.

### Implementability

- Alternative #1: No Action is easy to implement since no actions will be conducted.
- Alternative #2: AS / SVE is difficult to implement. This alternative requires field pilot studies, remedial design, the installation of numerous well points and the capitalization and installation of equipment for AS / SVE operation. This alternative also requires on-going monitoring and maintenance and close monitoring of field conditions to ensure vapor control and limit migration.
- Alternative #3: Excavation with Off-Site Disposal is moderately difficult to implement. Coordination (e.g., dust suppression and monitoring) during cleanup activities and short-term disturbance to the community (e.g., trucks transporting contaminated soils and backfill) are anticipated. However, ongoing monitoring and maintenance will not be required following excavation and offsite disposal.

### Cost

- There will be no costs under Alternative #1: No Action.
- The estimated cost for Alternative #2: AS / SVE is \$ 350,000.
- The estimated cost for Alternative #3: Excavation with Off-Site Disposal is \$ 200,000.

## **c. Recommended Cleanup Alternative**

The recommended cleanup alternative is Alternative #3: Excavation with Offsite Disposal. Alternative #1: No Action cannot be recommended since it does not address site risks. Alternative #2: AS / SVE is more expensive than excavating soils and disposing them off-site. Additionally, Alternative #2: AS / SVE may not be effective in reducing concentrations to levels below unrestricted use direct contact standards, would be difficult to implement and would require on-going monitoring and maintenance. Petroleum impacted soils that are excavated under Alternative #3: Excavation and Off-

Site Disposal could be transported to an asphalt batch facility for reuse as asphalt and/or could be reused as daily cover at a Massachusetts landfill. For these reasons, Alternative #3: Excavation with Off-Site Disposal is the recommended alternative.

***(no ATTACHMENT vi) through vii)***

---

**ATTACHMENT viii)**

***Justification for cleanup cost-share waiver (Section III.C.5 of Guidelines)***

The City of New Bedford is saddled with chronically high unemployment rates, low educational attainment, and a relatively unskilled labor force. According to the 2010 US Census ACS, New Bedford's unemployment rate was 12.6%, higher than both the Massachusetts average of 10.2% and the national average of 6.9% (2010 US Census ACS). The high school dropout rate for the New Bedford School Department was 20.8% in 2010/2011 school year, more than twice the state average of 8.2% (Massachusetts Department of Education). Only 9.6% of the city's 18-and-older population holds at least a bachelor's degree. This figure trails far behind the 22% figure for the Commonwealth and 18% nationally.

Underemployment is a continuing struggle for New Bedford. According to New Directions Southcoast, Inc., a career center that serves the city as well as surrounding towns, the number of full-time employment placements decreased from 1,177 in fiscal year (FY) 2010 to 905 in FY2011. In the first four months of FY 2012, New Directions has only made 228 full-time placements. Part-time placements (defined by New Directions as a maximum of 28 hours per week) increased from 138 in FY 2010 to 358 in FY 2011; there have been 82 part-time placements so far in FY 2012. In a city with 12.6% unemployment, the small successes represented in these placements are vastly overshadowed by the almost 12,000 workers who are without a job.

In 2010, the Crittenton Women's Union, an organization based in Boston, MA, reported on the costs of basic needs in the state using a methodology called the Massachusetts Economic Independence Index 2010 (Mass. Index). The Mass. Index was used to estimate the income level required for various family types in different areas of the state to meet expenses including housing, utilities, food, transportation, child care, health care, clothing, essential personal and household items, and taxes without public or private assistance. The Mass. Index for New Bedford (representative of Bristol County) was reported as follows:

<b>Family Type<sup>1</sup></b>	<b>Hourly wage required (2010)<sup>1</sup></b>	<b>Annual wage required (2010)<sup>1</sup></b>
1 Adult	\$11.25	\$23,753
1 Adult, 1 Preschooler	\$19.97	\$42,178
1 Adult, 1 Preschooler, 1 School-age child	\$25.59	\$54,037
2 Adults, 1 Preschooler, 1 School-age child	\$14.38	\$30,366

<sup>1</sup>Source: [http://www.liveworkthrive.org/research\\_and\\_tools](http://www.liveworkthrive.org/research_and_tools) (accessed November 23, 2011)

In New Bedford, New Directions reported that the average hourly wage for full-time placements in FY 2010 was \$13.57, and for part-time placements, the average hourly wage was \$11.40. At 40 hours a week for full-time jobs and a maximum estimate of 28 hours per week for part-time jobs, the annual wages of \$28,226 and \$16,598, respectively, fall short of the income level required to sustain any kind of family beyond a single-adult working full-time. While average wages have realized a modest increase for the start of FY 2012 (\$13.63/hr. for full-time placements, and \$12.20/hr. for part-time placements), annual income would still be insufficient to support the majority of New Bedford residents independently.

On September 3, 2011, Governor Deval Patrick declared a major disaster for the state in the wake of Tropical Storm Irene. Over \$3.4 million dollars in individual assistance has been approved, and almost \$524,000 has been obligated in public assistance grants ([www.fema.gov](http://www.fema.gov)). Strong winds in New Bedford and surrounding areas resulted in power outages, localized flooding, structural damage, and extensive tree damage.

Governor Patrick has claimed for the second year in a row that the fishing industry in Massachusetts, particularly along the southern coast, has suffered as a result of the regulatory switch to sector management and catch shares and has applied for \$21 million in federal disaster assistance. Fishing is the leading industry in New Bedford, where it continues to constitute the highest percentage of the city's annual revenues of any port in the nation. Thus, New Bedford's economy as a whole has been disproportionately impacted by altered fishing regulations. During the week of November 14, 2011, Mayor Scott Lang called on the New England Fisheries Management Council to reexamine the management structure of fishing stocks, while scores of local and regional commercial fisherman appealed to New England's Senators and Congressmen to further examine the litany of unfair flaws in restrictive fisheries management policies. Steve Urbon, a reporter with the *Standard-Times*, reported on the following studies in his November 16, 2011, article:

*The state Department of Fish and Game...studied Sector 10, which is mainly along the South Shore, and documented a 61 percent drop in groundfish landings between 2009, under the old days-at-sea system, and 2010, under catch shares. That resulted in a 52 percent drop in revenue among 27 boat owners, or \$1.5 million....Overall, total revenues were down \$11 million for 12 of the 17 sectors and the common pool, said the report. Another analysis by the state, the National Oceanic and Atmospheric Administration and the UMass School of Marine Science and Technology, confirmed that the state's groundfish fleet shrank 24 percent, and 45 percent of the remaining boats failed to break even. A third report by NOAA found increased and accelerating consolidation of the industry as small boats are being pushed out of business.*

Manufacturing is another major industry in the Greater New Bedford area; 16% of employment in these 10 towns and cities is in manufacturing, compared to 10% in the state and 12% in the nation. Between the third quarters of 2008 and 2009, manufacturing employment in the Greater New Bedford area declined by 10%<sup>2</sup>.

This continued job loss in multiple sectors has resulted in lower income and higher poverty rates. According to the 2010 US Census ACS, the median per capita family income of \$18,640 in New Bedford is 56% of the Massachusetts average of \$33,203 and 72% of the national average of \$26,059. Over 37% of the population of the City has income below the poverty level, compared to 11.4% for the Commonwealth as a whole and 15.3% for the nation.

The City budget has been impacted by reductions in state aid to New Bedford. New Bedford receives nearly half of funds for its City budget from state aid. Since 2008, state aid has decreased nearly 5%, while employee health care costs have skyrocketed. The result has been significant reduction in the City's workforce, including layoffs of teachers, fire fighters and police officers. Several hundred City employees were furloughed every week for four hours between September 2009 and July 2011.

While New Bedford has not exhausted its borrowing capacity, it continues to invest a significant portion of its resources in addressing environmental contamination. Since 2005, the City has spent over \$33.4 million in remediating one of its larger sites (Parker Street Waste Site), and expects to spend several million more before achieving a Condition of No Significant Risk under the Massachusetts Contingency Plan.

Given the City's current fiscal position and bleak economic forecast, it is unlikely the project would proceed if the cost share was not approved.

---

<sup>2</sup> Massachusetts Dept. of Workforce Development Regional Labor Market Information profile (Greater New Bedford), [http://lmi2.detma.org/lmi/pdf/profiles/Gr\\_NewBedford\\_Regional\\_Profile.pdf](http://lmi2.detma.org/lmi/pdf/profiles/Gr_NewBedford_Regional_Profile.pdf), accessed 11/2/11.

**(no ATTACHMENT ix)**

**ATTACHMENT x)**

***Petroleum Eligibility Determination (Section III.C.3.a through III.C.3.e and III.C.3.i of Guidelines)***



Commonwealth of Massachusetts  
Executive Office of Energy & Environmental Affairs

## Department of Environmental Protection

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

EWAL / AFF / CA  
Covers

ENVIRONMENTAL  
LIFE SCIENCE

REHARD / SULLIVAN /  
Sullivan

KENNEDY / HANSEN  
Kennedy

November 24, 2011

U.S. EPA New England  
Brownfields Project Officer  
Attn: Mr. Joseph Ferrari  
5 Post Office Square, Suite 100  
Mail Code: OSRR07-2  
Boston, MA 02109-3912

Subject: **STATE PETROLEUM ELIGIBILITY DETERMINATION**  
478-480 Union Street, New Bedford, Massachusetts  
(RTN: 4-1265)

Dear Mr. Ferrari:

The Massachusetts Department of Environmental Protection (MassDEP) has been requested by the City of New Bedford to make a determination as to whether the property listed above meets the definition of a Brownfield site and whether it is eligible to use U.S. Environmental Protection Agency (EPA) Brownfield petroleum cleanup grant funding, which is being applied for in this current, FY12, grant round. The City intends to use grant funds to perform cleanup of petroleum contamination of soil and groundwater.

The Site is a vacant parcel of land in a vibrant residential and commercial area. Asphalt and concrete surfaces remain on the northern portion of the Site. A single story building was located on the property and appeared to be a former auto body repair shop; the building was demolished by the City in 2011. In the spring of 2011, the City's consultant conducted Phase II environmental site assessment (ESA) activities to evaluate the Recognized Environmental Concerns that were identified in the Phase I ESA and to assess the extent of contamination remaining at the Site. Results of the investigation did not identify any abandoned underground storage tanks (USTs) or groundwater samples at concentrations above applicable standards; however, soil sample analyses identified petroleum and/or lead impacted soil on the northern and western portions of the Site - the area of former gasoline and fuel USTs. The City proposes remediation of the soil surrounding the former gasoline and fuel oil USTs. Excavation with offsite disposal is an effective way to eliminate risk at the Site, since contamination will be removed and the exposure pathways will no longer exist. Ongoing monitoring and maintenance will not be required following excavation and offsite disposal and no restrictions are planned or likely to be necessary following remediation, allowing an unrestricted use of the Site.

To maintain compatibility with surrounding neighborhood, the City seeks to redevelop the site for residential use. Portions of the site would be offered to abutting property owners to increase lot sizes and provide more greenspace for residents now living on lots as small as 3500 square feet.

The EPA requires that the MassDEP make a determination that any petroleum contaminated site seeking to use EPA Brownfield cleanup grant funding meets certain eligibility requirements. MassDEP is following EPA guideline criteria for eligibility determinations. After a review of MassDEP records and the information provided by the City of New Bedford for this property, MassDEP has determined that:

1. The subject property (478-480 Union Street) is contaminated with petroleum or petroleum products from historical storage of petroleum products. This property is a "relatively low risk" site as defined by EPA. This location is not currently being assessed or cleaned up using Leaking Underground Storage Tank (LUST) funds, nor is it subject to a response under the Oil Pollution Act.
2. The City of New Bedford is concerned about contamination at this site. The City acquired the property through tax foreclosure on July 3, 2008 from Karen M. Martins and George M. Martins. Since the property was acquired as a result of non-payment of real estate taxes, the former owners are not considered a viable party for performing assessment or response actions at the site. There are no viable past owners of this property.
3. The City of New Bedford has never conducted any activities or otherwise contributed to the historic petroleum contamination at this property.
4. EPA Brownfield funding will be used for assessment activities by a party (the City of New Bedford) that is not potentially liable for the petroleum contamination on this property.
5. There are no Judgments, Orders, or Third Party Suits that identify and require a responsible party to assess, investigate, or cleanup this property.
6. This property is not subject to any order under §9003(h) of the Resource Conservation and Recovery Act (RCRA).

I hope that this information is helpful, and please feel free to contact me directly at 617-556-1007 if you have any questions or concerns.

Sincerely,



Kerry Bowie  
MassDEP Brownfields Coordinator

Cc: Scott Lang, Mayor, City of New Bedford, 133 William Street, New Bedford, MA 02740  
Scott Alfonse, Department of Environmental Stewardship, City of New Bedford, Room 304  
Gerard Martin, MassDEP Central Regional Office

ATTACHMENT xi)

Special Considerations Checklist

Items below that apply to the City of New Bedford or the project as described in the 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) - *Tropical Storm Irene*
- Project is focusing primarily on Phase II assessments
- 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 (*Significant economic disruptions due to impacts of regulations on commercial fishing industry and plant closures*)
- Applicant is a recipient of a HUD/DOT/EPA Partnership for Sustainable Communities grant
- Community is implementing green remediation plans – *The City will adhere to the Recommended Elements for Greener Cleanup Environmental Footprint Assessments and Best Practices published by OSWER. At a minimum, the City will Reduce, Reuse and Recycle Material and Waste by beneficially reusing suitable excavated soil as daily landfill cover and by using local material for backfill.*