



CITY OF LAWRENCE

OFFICE OF THE MAYOR

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DANIEL RIVERA
 Mayor & CEO

12 December 2016

Frank Gardner
 US EPA Region 1
 5 Post Office Square
 Suite 100, Mail code: OSRR7-2
 Boston, MA 02109-3912

Subject: Cover Letter, Brownfield Site Specific Grant Proposal, Lawrence, MA

Mr. Gardner:

I am pleased to submit this application for a Brownfield Site Specific Assessment grant that will further Lawrence's commitment to public health and economic revitalization. The City of Lawrence has utilized previous grants as important tools in our redevelopment efforts. We look forward to additional funding so that we can continue successful Brownfields redevelopment, such as the national award winning Manchester Street Park, the Spicket River Greenway, and the recently completed Union Crossing affordable housing development.

A. Applicant Identification:

City of Lawrence
 Lawrence City Hall
 200 Common St.
 Lawrence MA 01840

B. Funding Requested:

- i. Grant type: Assessment
- ii. Assessment Grant Type: Site-specific
- iii. Federal Funds Requested: \$350,000 Yes, we are requesting a waiver. Please see the page titled, "Waiver Request" included in this application package.
- iv. Contamination: Hazardous Substances

C. Location: City of Lawrence, Essex County, MA

D. Property Information: for Site-Specific Proposals:

Tombarello Site Lot #2, 207 Marston St., Lawrence, MA 01841

E. Contacts:

i) Project Director:

Name: Abel Vargas, Business and Economic Development Director

Telephone: 978-620-3015

Fax: 978-722-9430

E-mail: avargas@cityoflawrence.com

Mailing Address: City of Lawrence Community Development Department,
225 Essex Street, Third Floor, Lawrence, MA 01840

ii) Chief Executive/Highest Ranking Elected Official:

Name: The Honorable Mayor Daniel Rivera

Telephone: 978-620-3010

Fax: 978-722-9200

E-mail: MayorRivera@cityoflawrence.com

Mailing Address: Office of the Mayor, City Hall, 200 Common St.,
Lawrence, MA 01841

F. Population:

i) Population of Lawrence, MA per the U.S. Census 2010: 76,377

ii) Lawrence is a municipal form of government.

iii) No Lawrence is not located within a county experiencing "persistent poverty."

G. Regional Priorities/Other Factors Checklist: Attached Appendix 3

H. Letter from the State or Tribal Environmental Authority: Attached

Thank you for your consideration of our proposal.

Sincerely,



Daniel Rivera
Mayor & CEO

1. COMMUNITY NEED

1.a. Target Community and Brownfields

1.a.i. Community and Target Area Descriptions: The City of Lawrence (30 miles north of Boston, MA) was created at the height of the Industrial Revolution as a fully planned city whose dams and canals took advantage of water power provided by the nearby Merrimack River. Massive textile mills flourished, providing jobs to immigrants that flocked to the city. When the majority of textile mills began leaving in the 1940s-50s, it precipitated a disinvestment in the city, leaving behind an impoverished, mostly immigrant, population living in neighborhoods experiencing environmental contamination due to a century of unregulated industrial development. Numerous abandoned mills and contaminated properties are part of city life and more recent industrial operations that included trash incinerators, landfills, automotive and body repair shops and other operations typically found in low income, minority communities have added to the burden. This industrial legacy resulted in the State identifying 273¹ brownfield sites in Lawrence, prompting EPA to designate Lawrence a **Making a Visible Difference** community.

Lawrence is an Environmental Justice (EJ) Community and a MA Economically Distressed Area (EDA). EDAs areas are eligible for targeted assistance under the MA Brownfields Act based on **economic distress** criteria including **unemployment, poverty, job loss and commercial vacancy**. Lawrence has not experienced any significant revitalization in over three decades, and remains the poorest in the Commonwealth and among the highest in crime rates. The **global economic downturn of 2008 hit this area particularly hard** and the **downsizing or closing of several manufacturing plants since then has resulted in the loss of over 500 jobs**.

Lawrence has the largest Latino population in New England (75.7 % Lawrence/10.2% MA²). Many residents face language/educational barriers, low wage employment opportunities and difficulty accessing medical and other services. Brownfields are part of neighborhood life, there is limited green space and access to healthy foods and quality recreational areas are limited.

The former Tamborello Property (the Site), is in the densely-populated Prospect Hill neighborhood (census tract 2508). The neighborhood is a mixed-use area with residential, institutional, educational, commercial and light industrial uses. There are 51 distressed properties in the neighborhood standing vacant and in disrepair. Stately single family houses on large lots, once occupied by mill merchants and managers, have now been divided into smaller apartments. Fifty five percent of the houses in the neighborhood were built in 1939 or earlier and 68% are renter-occupied³. A **high percentage of female headed households with children under 18 live in the neighborhood**. The **unemployment rate is high with more than 40% of households receiving SNAP benefits**. The Prospect Hill neighborhood is **located in a food desert with limited green space**. Traffic congestion and unsafe walking conditions exist and a previous road safety audit designated it a “high crash” area. Eleven residential properties closely abut the north end of the property along Hoffman Ave. To the west, across Marston St, lies Parthum Elementary/Middle School, Lorenz ball field and a 144-unit condo complex. To the south is an automobile dealership (formerly a waste recycling facility) and 400 feet to the east lies the Merrimack River and I-495.

1.a.ii. Demographic Information and Indicators of Need

¹ EPA Brownfields 2007 Grant Fact Sheet, Lawrence MA; 2007 Lawrence Brownfield grants/historical facts.png

² Data are from the 2010-2014 American Community Survey (ACS) 5 year estimates, DP05 <http://factfinder.census.gov>

³ Source: 2010-2014 American Community Survey 5 year estimates, DP04 at <http://factfinder.census.gov>

Targeted Community	CT 2508	Lawrence	MA	National
Population:	6,525 ¹	77,364 ¹	6,657,291 ¹	314,107,084 ¹
Unemployment: (Sept 2016)	N/A	6.4% ²	3.3% ²	5.0% ³
Poverty Rate:	22.4% ⁴	28.5% ⁴	11.6% ⁴	15.6% ⁴
Percent Minority:	68.8% ¹	82.3% ¹	25.0% ¹	37.2% ¹
Median Household Income:	\$34,111 ⁴	\$34,496 ⁴	\$67,846 ⁴	\$53,482 ⁴
Language Other than English	63.4% ⁵	76.6% ⁵	22.2% ⁵	20.9% ⁵
Female headed household children <18	12.7% ⁵	20.0% ⁵	6.9% ⁵	7.3% ⁵
Households with SNAP benefits	43.5% ⁴	40.9% ⁴	12.4% ⁴	13.0% ⁴
¹ Source: 2010-2014 American Community Survey 5 year estimates, DP05 at http://factfinder.census.gov ² MA Exec Office of Labor & Workforce Development DUA http://lmi2.detma.org/lmi/town_comparison.asp ³ Bureau of Labor Statistics; http://data.bls.gov/timeseries/LNS14000000 ⁴ Source: 2010-2014 American Community Survey 5 year estimates, DP03 at http://factfinder.census.gov ⁵ Source: 2010-2014 American Community Survey 5 year estimates, DP02 at http://factfinder.census.gov				

1.a.iii. Brownfields and their Impacts: The industrial legacy of Lawrence left 273 Brownfields in a densely-populated city that is only 7.4 square miles. The majority of the identified brownfield sites in the city lie north of the Merrimack River, in the canal district and surrounding neighborhoods, and the Tombarello site is located in this area. The poverty rate, income levels and sensitive populations within these areas are drastically higher than the rest of the state. Most residents live near multiple brownfields risking exposure to lead and asbestos from former residential sites and polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), heavy metals, chlorinated solvents, volatile organic compounds (VOCs) and other toxins from former industrial sites, gas stations and auto body shops. Exposure pathways can be either through direct contact or inhalation of vapors via soil or groundwater migration into indoor air. The Marston St. corridor where the Tombarello Site is located has a long history of contamination including a landfill, trash to energy incinerator, compressed natural gas facility and auto-related businesses. Currently a MA DOT yard is located less than a city block from Parthum school where road salt is stored. It contributes truck traffic and diesel fumes to an already highly traveled area. Two auto mechanic shops are located within a 1/2 mile from the Site.

The 14 acre Tombarello Site is the largest brownfield in the Prospect Hill neighborhood. It is an abandoned former scrap metal recycling facility near the Merrimack River and sensitive populations such as school aged children, low income families, and a high percentage of women of child bearing age. The site was owned and operated by John C. Tombarello & Sons, Inc. as a scrap metal recycling facility from 1941-1998. The southern end was once a soap manufacturer. In December 1998, the Site was sold to American Recycling, Inc. which accepted scrap metal including crushed automobiles, storage tanks, machinery and computer parts. Precious metals from the computers were extracted using cyanide. American Recycling abandoned the Site and First Lawrence Financial, LLC became the mortgage holder. A truck driving school operated on the Site in 2006. In May 2016, the City acquired the Site through tax taking. Two former industrial buildings, a former residential building and several building foundations are on Site.

Soil piles are scattered throughout and a 10-20-foot-high earthen berm is on the eastern and southern borders from pushing surface soils toward the property boundaries.

Environmental analysis of surface soil, subsurface soil and soil stockpiles at the Site indicate contaminants including PCBs, heavy metals (arsenic, chromium, mercury, lead), semivolatile organic compounds (SVOCs) and PAHs. PCB contamination exceeds 10 mg/kg and would constitute an Imminent Hazard/2-hour reporting condition if not for the fence around the Site.

In 2006, citizen complaints about dusty conditions and public health concerns sparked EPA and MA Department of Environmental Protection (MA DEP) to conduct site visits where scrap metal reclamation activities posed Immediate Hazard conditions. In 2010, EPA and START (Superfund Technical Assessment and Response Team) conducted surface and subsurface soil samples at residential properties on Hoffman Ave. finding high concentrations of contaminants including PCBs, lead, chromium and SVOCs. In 2011, EPA removed contaminated soil and conducted restoration activities from 4 abutting residential properties.

1.b Welfare, Environmental, and Public Health Impacts

1.b.i. Welfare Impacts: *Crime:* Abandoned vacant lots and weedy brownfields encourages crime and zip code 01841 where the Prospect Hill neighborhood is located, is rated 89/100 for violent crime (1: lowest; 100 highest). This mirrors the City (88.7) and is much higher than the State (41.4). Property crime also shows a similar trend with 01841 and Lawrence having a score of 75 compared to only 43.5 State.⁴ The Tombarello Site has been vandalized by arsonists who set fire to an abandoned house and brick building resulting in property destruction and neighborhood disruption. *Public Safety:* Arson at the Site places a burden on firefighters and public safety personnel and risks their exposure to contaminants. *Quality of Life:* The Tombarello Site has a long history of problems impacting the peace of mind of residents nearby: they worry about possible health impacts, are disrupted by vandalism, and their property values are negatively affected. *Blight:* Besides the large vacant Tombarello property, the neighborhood has 51 unoccupied distressed properties that add to a feeling of neglect. *Community Disinvestment:* Brownfields have created disincentives for external investments and contributed to unemployment, poverty and loss of tax revenue. *Food Security:* Prospect Hill is a food desert but brownfield sites are not desirable for developers who might locate a grocery store in the area. *Transportation:* Per 2010- 2014 ACS 5-year estimates, 20.8% percent of residents in CT2508 do not have access to a car and rely on walking, biking, and public transportation. Since the neighborhood abuts a busy commercial corridor, walking is unsafe with no dedicated bike lanes.

1.b.ii. Cumulative Environmental Issues: 100% of Lawrence is classified as an EJ community compared to 12.1% average for all MA communities. Within 3 miles of the Site are multiple environmental issues. The adjacent I-495 is heavily traveled with annual average daily traffic count for 2015 = 114,452.⁵ Morning/evening rush hour traffic is a source of gas and diesel emissions. The Marston St. corridor has a steady traffic flow increasing mobile source emissions and noise levels. A 2008 MA DPH report “Air Pollution and Pediatric Asthma in the Merrimack Valley” pointed to emission exposure at higher traffic volume areas a likely contributing factor to the high asthma rates among children. A former closed landfill is located southeast of the Site which is now a park. The area around the Site contains auto sales and mechanic businesses and a former waste transfer station abuts the property. Across I-495 and the Merrimack River is a

⁴ Sperling’s Best Places: <http://www.bestplaces.net/crime/zip-code/massachusetts/lawrence/01841>.

⁵ Mass DOT: <http://mhd.ms2soft.com/tcds/tsearch.asp?loc=Mhd&mod=> Local ID:5071

wastewater treatment facility and Lawrence Municipal Airport, further impacting pollution and noise levels. A former natural gas storage facility, and two incinerators are within 3 miles.

According to MA DEPs Waste Site/Reportable Release Look Up, Lawrence has 7 Tier 1 sites (most hazardous) and the Tombarello Site is one of these. The Toxics Action Center's April 2010 Report, *Toxics in Massachusetts: A Town-by-Town Profile*⁶, indicates Lawrence has 10 large quantity hazardous waste generators (facilities generating more than 1,000 kg of hazardous waste and/or more than 1 kg of acutely hazardous waste/month) as well as 2 capped landfills.

Compared to the State, Lawrence has 4.5 X less green space (16.5% Lawrence/74.8% State).⁷ The Merrimack River, is an impaired waterway and despite 150 years of waste discharges into the River, it is still used for sustenance fishing and drinking water for the City of Lawrence.

1.b.iii Cumulative Public Health Impacts: Brownfields, cumulative environmental issues and adverse social determinants negatively impact the health of Lawrence residents with young children, low income residents and elders particularly affected. Chronic conditions such as overweight and obesity were top health concerns identified in a 2016 Community Health Needs Assessment. Residents cited the lack of accessibility and crime as barriers to eating healthy and being physically active. Per MA Community Health Information Profile (MA CHIP), the prevalence of diabetes in Lawrence is higher (12.8%) compared to the State (7.5%) and the difference in diabetes prevalence rates is particularly striking in the 45-64 age group (24.2% Lawrence/9.3% State) and 65+ age group (33.7% Lawrence/ 17.9% State).⁸ Studies have pointed to a link between PCB exposure and a higher risk of diabetes (Carpenter 2008). Overweight and obesity statistics among youth are also notable: Overweight: 22.2% Lawrence/17.1% State; Obese: 25.4% Lawrence/16.3% State.⁹ Unsafe walking/biking conditions and fear of personal safety around the abandoned brownfield contribute to the lack of exercise.

Young children and elders are particularly sensitive and adversely affected by poor outdoor and indoor air quality. The older housing stock and emissions from high traffic areas puts children at disproportionate risk for lead poisoning and asthma. The MA Department of Public Health's Childhood Lead Poisoning Prevention Program (MA CLPPP) ranks Lawrence #5 out of 20 high risk communities in MA (high risk scores: 14.7 Lawrence/9.4 all high-risk communities/2.8 State).¹⁰ This risk is exacerbated by brownfields, many of which are contaminated with lead and other heavy metals. PCB's have been linked to respiratory problems (ATSDR). Pediatric asthma prevalence in Lawrence among K-8 students is about 1.5 X higher than the State (rate per 100 K-8 students: 18.1 Lawrence vs 12.4 State).¹¹ SVOCs from brownfield sites such as the Tombarello Site, can leach into indoor air amplifying poor indoor air quality. PCBs and lead in soil near hazardous waste sites can affect children if they play in contaminated soil or put dirty toys, hands or other objects in their mouths. Another health concern, because of the high number of women of child bearing age in the area, is the relationship between PCB's to low birth weight babies.

⁶ Toxics Action Center: <http://www.toxicsaction.org/sites/default/files/tac/information/TAC-toxics-in-massachusetts.pdf>

⁷ MA Environmental Public Health Tracking: Community Profile for Lawrence; <http://www.mass.gov/dph/matranking>

⁸ MA CHIP Diabetes Report: www.mass.gov/eohhs/docs/dph/masschip/diabetes/h-o/diabetescity-townlawrence.rtf

⁹ MA CHIP Youth Weight Status Report: <http://www.mass.gov/eohhs/researcher/community-health/masschip/youth-weight-status-2010.html>

¹⁰ MA CLPPP: www.mass.gov/dph/clppp

¹¹ MA Department of Public Health, Bureau of Environmental Health: <https://matranking.ehs.state.ma.us>

1.c. Financial Need

1.c. i. Economic Conditions: The over 1,000 vacant lots/underutilized spaces in Lawrence coupled with a largely low-income population results in a limited tax base and inadequate funding for environmental remediation. The City is owed \$21 million in back taxes on multiple properties.¹² Lawrence does not have the funds to clean up the Site. It has a legacy of outflow, not reinvestment, of capital: lost financial capital (manufacturing/ business profits), and lost human capital (individual/ civic/ business sector leadership). The weakened tax base strains an already tight municipal budget to keep up with critical public services. In 2010, it had a \$27 million operating deficit prompting the State to appoint a fiscal overseer. The demographic upheaval and church divestment of recent decades took a toll on social safety nets; **the 2008 national recession** further weakened the remaining manufacturing sector, eroding many recent Latino family economic gains. In the past year, the loss of two local businesses (Lawrence Pumps and Polartec) was announced (cumulative loss: 285 manufacturing jobs¹³). Other recent local factory shutdowns/downsizing include Microsemi Corporation (over 100 jobs lost) and a General Mills yogurt factory (144 jobs lost).¹⁴ The heavy snowfall in 2014-2015 resulted in the City spending \$3M more than budgeted for road salting, snow plowing and removal. Recent extreme rain events have led to flooding of large sections of neighborhoods straining city funds.

1.c. ii. Economic Effects of Brownfields: Declining property values and economic distress caused by the many high-priority brownfields debilitates Lawrence's long-term economic recovery. The significant remediation places a heavy burden on local government. Prospective residents and developers are looking for better neighborhoods and housing opportunities causing out-migration of the very residents best equipped to stimulate growth. The Tombarello Site is located on prime development property near the highway with 500+ feet of visible highway frontage. It has tremendous redevelopment potential. Developers have inquired about the Site but contamination is a barrier to positive reuse. Comparing 14 acres of active-use sites nearby, the Economic Development Director estimated that by sitting idle, the Tombarello Site is lost opportunity for the City of about \$260,000/year in tax revenue.

2. PROJECT DESCRIPTION AND FEASIBILITY OF SUCCESS

2. a. Project Description, Timing and Implementation

2.a.i. Project Description and Alignment with Revitalization Plans

Project Description: The cleanup and redevelopment of the 14 acre vacant Tombarello Site will be conducted in two phases which take into account the differing contamination levels between Lot #1 and Lot #2. The smaller Lot #1, located along Marston St, is less contaminated and ready for cleanup and redevelopment. **Lot #2, the focus of this site specific assessment,** is 11.4 acres and located east of Lot #1 and parallel to I 495 and the Merrimack River. Lot #2 has shown heavy contamination and this assessment funding will allow for further risk assessment to delineate a safe and cost effective cleanup and redevelopment approach.

Alignment with Revitalization Plans: Lawrence's Urban Renewal Plan, generated with robust community input, identifies four key areas important to Lawrence's revitalization: 1) Economic Development, 2) Job Creation, 3) Quality of Life and 4) Municipal Fiscal Stability. The proposed redevelopment of the Tombarello Site aligns with each of these goals and has great

¹² Communication with City of Lawrence Economic Development Director

¹³ Eagle Tribune, Thursday, September 29, 2016; <http://www.eagletribune.com/news>

¹⁴ Eagle Tribune, Friday, September 29, 2014; <http://www.eagletribune.com/news>

potential to be a lynchpin in the economic revitalization of the City. Since it is the largest brownfield in the Prospect Hill neighborhood, its cleanup and redevelopment will have profound benefits to the neighborhood and positively impact and address community needs. During the development of this proposal, the City engaged developers, key stakeholders, residents, and the Lawrence Partnership, a private/public sector collaboration focused on the City's economic development, that includes the leaders of most of the banks in Lawrence. Feedback from these groups has been included in the phasing and marketing strategy developed by the city.

REDEVELOPMENT PLAN: Phase I: Cleanup and Redevelopment of Lot #1. This 2.6-acre lot along Marston St. will include neighborhood amenities (bank and pharmacy);

Phase II: Cleanup and Redevelopment of Lot #2. A large anchor store that sells food is desired for this 11.4-acre lot behind Lot #1. Additional Site development includes a **green buffer zone and walking path**, planned between Hoffman St. homes and the Site's northern boundary. This portion was partially cleaned up by EPA during the removal action in 2011.

Integration with transit: Marston St. is a priority for Lawrence's **Complete Streets** projects and includes a road safety audit and assessment for public transit adequacy to the neighborhood.

Use of existing infrastructure: Utilities and telecommunications service are currently available along Marston St. and can be easily connected to the Site through underground utility corridors.

Integrating Equitable and Sustainable Development and Livability Principles: Lawrence's low income, majority Latino population, high unemployment rate and high incidence of obesity, asthma and other chronic diseases make health equity and sustainability important considerations into Site design. For instance, **providing more transportation options along Marston St.** will decrease household transportation costs, improve air quality, create a safer, more walkable, bikeable neighborhood and promote public health. **Improving economic competitiveness of Prospect Hill** by bringing in services that provide residents with healthy, affordable and cultural options (ie pharmacy, store that sells fruits and vegetables) will contribute to employment opportunities and health. **Enhancing the neighborhood with a green buffer zone and walking path** will help with noise/air pollution, reduce the heat island effect, help mitigate stormwater flow, and provide opportunity for physical activity. **Low Impact Development approaches** and the city's **stormwater ordinance** will help prevent pollution of the Merrimack River. The City will encourage development that integrates **LEED certification and green building design**.

2.a.ii. Timing and Implementation

(a) Contractor Procurement: The Mayor heads all City departments. The City follows MA procurement laws. The Office of Planning and Development (OPD) will manage the grant. The **Manager of Finance and Admin.** ultimately oversees the procurement process. Public procurement announcements are published in local newspapers (English and Spanish) targeting local contractors. The Project Manager and the Finance Manager evaluates bids based on established criteria, awarding the contract to the lowest bidder meeting program requirements. The Qualified Environmental Professional (QEP) will be procured using this process.

(b) Existing Conditions: Existing conditions described below are based on several field investigations conducted between 1998-2016. Prior environmental assessment was undertaken for both Lot #1 and Lot #2. **The existing conditions provided herein focus on Lot #2 only.**

Lot #2 is occupied by three buildings and three concrete slabs that are remnants of past operations as a scrap metal recycling facility. One building is a wood-framed former residence that has

suffered structural damage due to a fire, the other two buildings are former industrial use structures that are steel-framed with concrete block and brick construction. The concrete slabs are reported to have been used for baling and shearing during metals recycling operations.

Fill material containing metal, brick, ash, slag, glass, and other man-made debris have been encountered in nearly every subsurface exploration. The depth of fill material varies widely across the Site ranging from 2 to 15 feet below ground surface (bgs), with an average fill thickness of 4 to 6 feet. Contaminants detected in Site soils are likely associated with historical operations as a burn dump/landfill and scrap metal/salvage yard. Native sands were encountered in deeper soil borings performed for monitoring well installations.

A prominent feature on Lot #2 is a soil berm that is present along the southern and eastern property boundaries. This berm is 15 to 20 feet high, and was reportedly created by pushing surface soils from the interior to the perimeter. Additionally, there are several soil and debris piles located on the site. Measurements made during a 2016 assessment indicated the volume of soil present above grade at the site (between berms and soil piles) is approximately 25,000 cubic yards. Soil samples have revealed concentrations of PCBs, PAHs, and heavy metals above risk-based screening thresholds. The following sections summarize the extent of soil contamination:

PCB Contamination in Soil: PCBs have been detected throughout the Site in both surface (0-1 foot bgs) and subsurface soils (greater than 1 foot bgs). The vast majority of contaminated soil is located within 5 feet of the ground surface. The primary exception to this rule is the berm, where contaminated soils have been identified up to 15 feet below the top of the berm. PCB concentrations have ranged from non-detect to 1,300 mg/kg. In most areas, soils contain less than 50 mg/kg PCBs, but portions of the soil berms and several stockpiles contain PCBs above 50 mg/kg. **Metals Contamination in Soil:** Arsenic, chromium and lead have been detected throughout at concentrations that exceed their respective Massachusetts Contingency Plan (MCP) Method 1 risk assessment soil standards. The heavy metal most frequently is lead with concentrations that have exceeded standards in most of the soil samples collected, with a maximum concentration of 10,000 mg/kg. **PAH Contamination in Soil:** PAHs have been detected throughout above applicable MCP Method 1 S-1 Soil Standards. PAHs were detected above Method 1 standards in most of the soil samples during a 2016 investigation. **Groundwater Contamination:** Low concentrations of VOCs and SVOCs have been detected in groundwater samples collected from on-site monitoring wells. The only contaminant present above risk-based screening values in groundwater is lead.

The assessment strategy for Lot #2 includes extensive characterization of soil and sampling and analysis of building materials to facilitate the demolition and off-site reuse/disposal of debris. Additional soil sampling will be performed to delineate the extent of PCBs, PAHs, and metals. Emphasis will be placed on characterization of the soil berms, as these soils appear to contain the highest levels of contamination and represent a visual barrier between the site and I-495. A hazardous building materials survey will be performed of the three existing buildings to evaluate for the presence of, and provide quantities, of asbestos, lead-based paint, PCBs, and other universal wastes present on and within these structures. This survey will enable the development of abatement and demolition costs for these structures. Oil staining has been observed on the concrete slabs remaining on site. Characterization of the presence of contamination on these concrete slabs is warranted to evaluate whether this material can be recycled or whether it must be managed as a contaminated, or even hazardous, waste. PCB concentrations greater than 50 mg/kg

have been detected in soil samples, triggering notification and remediation requirements under the Toxic Substances Control Act (TSCA). Cleanup and redevelopment of the site will be performed under the oversight of EPA's TSCA program. A "risk-based" cleanup plan will need to be developed to gain EPA approval of the cleanup plan. Assessment funding is required to perform risk assessment work and prepare the cleanup plan. The site is also regulated by MassDEP due to the concentrations of PCBs, PAHs, and metals detected in environmental media. The City has an obligation to perform Comprehensive Response Actions in accordance with the Massachusetts Contingency Plan (MCP-Massachusetts environmental regulations) to address the release of contaminants to the environment. Assessment funding will be required to fulfill the obligations of the MCP which include a Phase II Comprehensive Site Assessment, Phase III Remedial Action Plan, Phase IV Remedial Implementation Plan. These planning documents will prepare the site for remediation.

The tasks outlined are necessary for the City to adequately characterize the site in preparation for abatement, demolition, and remediation. The following is the task timeline:

0-6 Months- QAPP approved; **6-18 Months-** Phase II Assessment; **18-24 Months-** Phase III Remedial Action Plan and Phase IV Remedial Implementation Plan; **24-30 Months-** TSCA Risk-based Cleanup and Disposal Plan; **30-36 Months-** Remedial Action Plan.

(c) Obtaining and Securing Access: Adjacent property access is not anticipated, but if needed, the City has an access agreement template from past brownfield projects. The City has been in conversation with abutters who enthusiastically support the project. The City has secured the perimeter of the Site with a locked chain link fence with warning signs posted and a camera. City staff are driving by the Site 3X/week to check on the integrity of the fence and if there are problems, they are reported to the DPW for remediation. This will continue throughout the project.

2.bi. Task Descriptions and Budget: Due to parcel size of the parcel and widespread contamination, both below ground (soil) and above ground (building materials), assessment of this site is costlier than is typical. The City is requesting \$350,000 grant funding of which \$292,745 is needed for assessment. The following are tasks, activities, person responsible, outputs, and costs.

TASK 1 - COOPERATIVE AGREEMENT OVERSIGHT: Task Focus- Programmatic grant management. Expenses: Staff time: The *Project Manager (PM)* will coordinate efforts between the City, LSP***, grant partners, and EPA Project Officer, and attend EPA National Brownfield Conf. The *Mgr of Finance and Admin.* will provide financial oversight, process invoices, submit monthly billing, procure LSP. The *Economic Development Officer* will prepare quarterly reports and ACRES documentation. **Outputs:** Timely completion of tasks/ expenditures, conference attended, LSP secured, EPA reports and ACRES updated, Closeout of Cooperative Agreement.

***In MA, the Brownfields Program is a privatized waste site assessment and cleanup program. Site assessments are done by Licensed Site Professionals (LSPs) rather than MassDEP. LSPs are State licensed and develop and execute a scope of work that will satisfy State requirements to address contaminated property (MA General Law c.21E and the MA Contingency Plan).

1) Personnel Costs: \$16,428

PM -100 hours at \$41.18/hour incl. tax and fringe = \$4,118

Mgr of Finance and Admin -75 hours at \$54.61/hour incl. tax and fringe = \$4,096

Economic Development Officer- 200 hours at \$41.07/hour incl. tax and fringe = \$8,214

2) **Travel Costs:** \$1,000 for PM to attend EPA Conference includes Airfare/lodging/per diem will be paid for out of our current Area Wide Planning Grant.

TASK 2 - COMMUNITY OUTREACH AND ENGAGEMENT: Task Focus- Stakeholder engagement. **Expenses:** staff time, outreach supplies, contractual. **Staff:** The PM will prepare a Community Relations Plan and related materials, attend public meetings and interface with local businesses, residents, elected officials. The City's *Neighborhood Planner* will attend neighborhood association meetings, engage with school personnel/parents. **Contractual:** LSP will educate residents/stakeholders about assessment findings. GWL will assist with outreach and organizing public meetings **Outputs:** Community Relations Plan developed, 2 public meetings held, handouts produced, meeting minutes/public comments documented, interaction with City Councilors/ businesses/school community, 12 neighborhood meetings attended.

1) Personnel Costs: \$6,188

PM -100 hours at \$41.18/hour incl. tax and fringe = \$4,118

Neighborhood Planner -50 hours at \$41.40/hour incl. tax and fringe = \$2,070

2) **Supplies: \$645** for placing advertisements in the newspaper and printing outreach materials

3) Contractual: \$22,000

LSP - 20 hours at \$100/hr = \$2,000

GWL- \$20,000 GWL rates/hour estimates include: *Project Director* 20 hours \$105/hour = \$12,540; *Community Engagement Manager*- 50 hours at \$50/hour = \$2,500; *Deputy Director*- 50 hours at \$94/hour = \$4,675 *Finance Director*-5.7 hours at \$50/hour= \$285

TASK 3 - SITE-SPECIFIC ASSESSMENT ACTIVITIES: Task Focus: Quality Assurance Project Plan, QAPP submission, and implementation of site assessment tasks. **Expenses:** Contractual, LSP will finalize QAPP, implement field investigations, prepare project planning documents, interact with regulatory agencies (MassDEP/ EPA). **Outputs:** Finalized QAPP, MCP Phase II Comprehensive Site Assessment, MCP Phase III Remedial Action Plan, MCP Phase IV Remedial Implementation Plan, TSCA Risk-Based Cleanup/Disposal Plan and Remedial Action Plan.

1)Contractual: \$292,000

Subcontractors= \$102,000 Driller \$52,000; Lab \$40,000; Waste Management \$10,000

LSP- 1900 hours at \$100/ hour = \$190,000 time estimates: QAPP100hr; MCP Phase II Assessment 750hr; MCP Phase III Remedial Action Plan200hr; MCP Phase IV Remedial Implementation Plan 500hr;TSCA Risk-Based Cleanup/Disposal Plan 200hr; Remedial Action Plan 150hr.

TASK 4 - OVERSEE SITE ASSESSMENT: Task Focus: Project monitoring, closeout, redevelopment planning. **Expenses:** staff time and contractual. **Staff:** The PM will meet with LSP regularly to ensure assessment is progressing according to project plans, work with developers on site redevelopment plans and City Departments to coordinate Complete Street efforts. The *Economic Development Officer* will provide field inspections to ensure safety, site security and efficiency. **Contractual:** LSP will update PM on operations, coordinate with Mass DEP and EPA, assure all required paperwork and documentation is completed. **Outputs:** Field operations meetings, remediation plans developed and approved by regulatory agencies, closeout reports generated.

1) Personnel Costs: \$4,939

PM -100 hours at \$41.18/hour incl. tax and fringe = \$4,118

Economic Development PO -20 hours at \$41.07/hour incl. tax and fringe = \$821

2) **Contractual: \$15,000 EPA Grant: \$15,000 Cost Share: \$0**

LSP- 78 hrs at 100/hour = \$7,800

2bii Budget Table	Project Tasks (\$)				
Budget Categories	1. Grant Oversight	2 Community Outreach	3. Assessment Activities	4. Oversee Assessment	Total
Personnel inc. Fringe	\$16,428	\$ 6,188	\$ 0	\$4,939	\$27,555
Supplies	\$ 0	\$ 645	\$ 0	0	\$ 645
Contractual	\$ 0	\$22,000	\$292,000	\$7,800	\$321,800
Total Budget	\$16,428	\$28,833	\$292,000	\$12,739	\$350,000

2.c. Ability to Leverage: The Tombarello Site has already received approximately \$150,000 in Targeted Brownfield Assessment funds and \$1.2 M in 2010 to clean up Hoffman St. house lots. We anticipate funds generated from the sale and redevelopment of Lot #1 will assist with future cleanup of Lot #2. For this project, the City has already secured the following leveraged fund commitments: (See Attached Documentation of Leveraging.)

Organization	Source/ Use	Value (\$)	Status
MA Development	BF Redev Fund; T/A for Mkt and Transit Eval	\$50K estimated	secured
City DPW	Chapter 90-Roadwork, sidewalks	\$100K	secured
City OPD	HUD CDBG Infrastructure/utility connections	\$50K	secured
MA DOT	Marston's Complete Streets	\$400K	seeking

COMMUNITY ENGAGEMENT AND PARTNERSHIPS

3.a. Engaging the Community:

3.a.i. Community Involvement Plan: The City of Lawrence and its project partners are committed to thoughtfully engaging all potential stakeholders throughout the remedial planning and cleanup process and will implement an engagement plan that focuses on equity and inclusion.

Prior to submitting this proposal, the City engaged the community through a public meeting at the Redeemer Lutheran Church, located less than 1/2 mile from the Site. The project team presented the findings of the recent assessment work, discussed the analysis of brownfield cleanup alternatives and presented redevelopment options. Prior to the meeting, outreach staff from the City and Groundwork Lawrence (GWL) canvassed neighborhoods adjacent to the site to promote the meeting and answer any questions residents had. The project team attended at the Prospect Hill and the District A Neighborhood Associations to review the project and promote the public meeting. The meeting was attended by nearly 40 residents. Feedback from residents is included in this proposal and will continue to inform during the project implementation.

Engaging the neighborhood in the project requires working at multiple levels to ensure equity and inclusion. These stakeholders strongly support the city taking ownership of the property because they have long wanted previous property owners to implement remedial actions and commence reuse planning. Primary stakeholders will have direct contact with the City's PM to ensure they feel included and allay any concerns about the risks to public health and safety. Contact will be established through direct outreach and will include door knocking, literature distribution,

social media and updates at neighborhood association meetings. The city will implement two public meetings at project milestones to ensure transparency, equity, and inclusion. The PM has an established rapport with local businesses and developers interested in the Site. As the project progresses, he will continue this communication and expand this outreach to other potential developers who align with redevelopment strategies.

3.a.ii. Communicating Progress: The PM will be a continual point of contact with the public to address any on-going concerns. All communication will be in Spanish and English using multiple medium. Besides public meetings, the City commits to using social media and a project website to broadcast project updates and provide links to assessment and remedial planning documents. A Facebook page has been created and will be used ongoing to share information.

Safety is a prime consideration since the site is located across from a school and many single mothers with children live in the area. Public meetings will address citizen concerns around health, safety, and community disruption and educate the public about methods implemented to ensure safety. To ensure activities are conducted in a manner protective of the sensitive populations identified, the following strategies will be used: LSP oversight, fence and camera around property, warning signs in multiple languages, and monitoring of fugitive dust emissions.

3.b. Partnerships with Government Agencies

3.b. i. Local/State/Tribal Environmental Authority: The **Massachusetts Department of Environmental Protection (MassDEP)** is the state agency that runs the Brownfield Program. The City has established a strong partnership with MassDEP and has met with officials to develop a strategy ensuring the project meets all applicable standards and is protective of environment and human health. MassDEP will continue to advise and provide technical assistance and is currently working with the City to provide fencing around the Site and a survey of existing conditions. The LSP will coordinate with MassDEP to ensure all requirements are met.

3.b.ii. Other Governmental Partnerships: **EPA** has a long history with the Tombarello Site and will continue to interact with the PM and LSP to ensure that project progress is protective of human and environmental health. Cleanup and redevelopment of this site will have to be performed under the oversight of EPA's TSCA program. Several years ago, the Agency implemented an emergency response action to minimize threats to public health along the north side of the Site. After the City took ownership of the property, EPA implemented a Targeted Brownfield Assessment project to help the City develop a strategy for the project. **EPA's Making a Visible Difference team** has a strong presence in Lawrence working collaboratively to address a broad range of local issues. This partnership builds upon the City's already strong relationship with EPA brownfield staff and will be important for this project.

Partnerships with other State and Federal agencies will provide leveraged funds to ensure its success: 1) HUD CDBG funds will be utilized for infrastructure and utility connections; 2) **MA Development** will provide Brown-field Redevelopment Funding to assist with market feasibility and transit planning; 3) MA DOT Complete Streets funding is anticipated and Marston St. is a priority area; and 4) the City's Chapter 90 funds will be used for roadwork and sidewalks.

These partnerships align with the **EPA Region 1 priority of Coordinated Public Funding for Brownfields**. Lawrence has a history of successful brownfields redevelopment, leveraging funding and building strong partnerships with EPA, MassDEP and other Federal, State and local agencies. Examples include the award-winning Manchester Street Park, the Spicket River

Greenway and the Union Crossing affordable housing development. This funding request, will “fill the gap” allow for the necessary assessment work to redevelop this prime site for commercial use, put it back on the tax rolls and remove a long-time eyesore and public health threat.

3.c. Partnerships with Community Organizations

3.c.i. Community Organization Description & Role:

Merrimack Valley Planning Comm: Regional Planning Agency providing brownfield redevelopment financing. Role: Assistance with reuse planning and recruitment of companies.

Groundwork Lawrence (GWL): Community-based organization with expertise in community engagement, transforming brownfields, workforce development. Role: Assist with outreach, community engagement, organize public meetings, contribute to assessment, planning, and implementation of the project. The City has an existing Cooperative Agreement with GWL to conduct these activities. Contact: Heather McMann, Executive Director, 978-974-0770x7009.

Neighborhood Associations (District A and Prospect Hill): Two resident led groups. Role: Provide time and space during monthly meetings for project updates and resident input. Contact: District A- Maria De La Cruz 978-303-7243/ Prospect Hill- David Struffolino 978-688-3446

3.c. ii. Letters of Commitment: Please see Attachment

3.d. Partnerships with Workforce Development Programs

Efforts are made to enlist remediation contractors that are local, minority and/or women owned and employ Lawrence residents. Procurement announcements are published in local newspapers (English/ Spanish). The City will work in collaboration with GWL and Merrimack Valley Workforce Investment Board (WIB) who is a recipient of a 2015 EPA Job Training Grant. WIB offers an Environmental Technical Training Program in the fields of Brownfield Remediation and Hazardous Materials Handling. The 2017 Spring training will be conducted in Spanish. WIB will track participant’s hiring and make graduates aware of local job opportunities.

4. PROJECT BENEFITS

4. a. Welfare, Environmental and Public Health Benefits

WELFARE BENEFITS: 1) ***Increase in quality of life:*** Assessment of Lot #2 is the first step to making this heavily contaminated brownfield repurposed. The eventual cleanup and redevelopment of the entire project will mean residents no longer have to worry about possible exposure to contaminants and their health effects, nor disturbed by arson/vandalism. The green buffer/ walk path will add green space to the neighborhood and decrease noise and pollution.

2) ***Increase in food security:*** A large anchor store that offers food in this food desert will benefit all residents especially sensitive populations (single mothers with children and residents receiving SNAP benefits) by increasing access to nutritional sources locally. 3) ***Supports all modes of transportation:*** Redevelopment will be coordinated with traffic studies on Marston St. to assess congestion and improve traffic flow/safety. Marston St. is a priority area for City’s Complete Streets projects integrating safety and accessibility for all users and increasing walkability and bikeability. This will particularly benefit children, elders and the 21% of neighborhood residents that do not own a car. 4) ***Increase employment options:*** The projected redevelopment will include an anchor store that can create many jobs of varying skill levels with career advancement opportunities thus reducing unemployment and increasing family income.

ENVIRONMENTAL BENEFITS: 1) ***Increase in air quality:*** Exposure to SVOCs will be eliminated and the green buffer will help remove airborne particulates and reduce heat island effect.

- 2) **Increase in water quality:** Low Impact Development approaches and application of the stormwater ordinance will capture stormwater and prevent pollution of the Merrimack River.
- 3) **Overall reduction in contamination:** Removal of PCB and heavy metal hotspots will reduce overall contamination and capping/cover will prevent exposure to contaminants left on-site.

PUBLIC HEALTH BENEFITS: 1) **Reduced exposure to site contaminants:** Residents and safety personnel will no longer risk exposure by soil or air to PCBs, heavy metals, SVOCs, PAH's and other contaminants. Children's potential exposure to lead and PCBs will be reduced and potentially help with a reduction in diabetes, improved breathing and reduced blood lead levels.

2) **Improvement in chronic disease outcomes:** The Complete Streets and the walking path will promote physical activity and help decrease the rate of overweight/obesity and diabetes in neighborhood residents. Improvement in air quality will benefit asthmatics.

3) **Increase in fresh fruits and vegetable access:** An anchor store offering fresh fruits and vegetables will provide healthy lifestyle choices and greatly improve nutritional quality by decreasing access barriers- especially important to the nearby single mothers with children.

4) **Improved mental well-being** from no longer living near a blighted brownfield site.

4.b. Economic and Community Benefits

The site-specific assessment will result in 11.4 acres of highly contaminated brownfield made ready for cleanup, reuse and redevelopment. The following plans will be developed: MCP Phase II Comprehensive Site Assessment; MCP Phase III Remedial Action Plan; MCP Phase IV Remedial Implementation Plan and TSCA Risk-Based Cleanup and Disposal Plan. The project will economically benefit the City by refining remedial cost estimates and help attract developers. The project will leverage a total of \$600K to: Conduct a marketing analysis and plan; Integrate Complete Streets and upgrade sidewalks and roads in the neighborhood thus making it more walkable and safe. An anchor store that sells food is desired for the Site increasing access to food and jobs.

Completion of Phases I and II will turn a 14-acre brownfield into an economically viable community asset, generate an estimated \$260,000/ year in tax revenue and add approximately 300 retail /service jobs with the potential for career ladders. Benefits include: needed services added to the neighborhood; reduction in contaminant exposure; improved ability to sell homes along Hoffman Ave; and green space and a walking path introduced to the area.

5. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

5.a. Audit Findings: The City of Lawrence has had no adverse audit findings nor has it been designated a high-risk grantee by the EPA related to any Brownfield grants the City has received.

5.b. Programmatic Capability: Organizational structure: The Mayor is in direct charge of all municipal offices. Lawrence's EPA Brownfield Site Specific Assessment grant will be managed by the Office of Planning and Development (OPD). Regular status reports will be provided to the Mayor. OPD has an existing and experienced staff with capacity to ensure timely and successful expenditure of funds and completion of all technical and administrative financial requirements. OPD is experienced with managing multiple Federal and State grants and has financial management systems in place to allocate grant funds to appropriate costs. Key staff identified for this grant are currently involved with a 2015 AWP grant. Their roles and experience include:

Business and Economic Development Director- Abel Vargas: **Role- Project Manager (PM):** Overall responsibility to assure partner and sub-recipient commitments are being met; Coord-

inate with City Departments and internal team; Interface with local businesses and developers; Manage relationships with key stakeholders and point of contact for the community; keeps the Mayor informed; and Coordinates with the EPA Program Officer. *Experience:* **Successfully administered EPA Area Wide Planning Grant**; developed work relationships with Mass Development, EPA Region I staff; leveraged \$750K from the EPA for Brownfield assessment.

Manager of Financial & Administrative Services -Susan Fink: *Role-* **Financial oversight** of grant; oversee bid process. *Experience* -Overseen the administrative and financial requirements of most of recent EPA Brownfield grants. Employed by the Community Development Department since 1995 and manages numerous Federal, State and Foundation grants.

Economic Development Officer II -Francis O'Connor: *Role* -Prepare EPA quarterly **reports and ACRES updates**, document Davis-Bacon Wage Act compliance. *Experience*- 10-year experience with EPA ACRES reporting and with the City of Lawrence.

Neighborhood Planner- Wendy Luzon: *Role-* Responsible for **communicating project and outreach** to neighborhood associations, neighborhood school and other community groups. *Experience* - In her role as Neighborhood Planner builds upon her strong community ties gained by 15 years as a community activist and co-founder of non-profit focused on domestic violence.

The OPD is poised to work with a qualified LSP and a strong team of community partners. The LSP will be acquired through a procurement process conducted by the **Manager of Finance and Admin** following Commonwealth of Mass. Procurement Laws. The City will utilize GWL as the primary outreach and educational partner. The City has a Cooperative Agreement with GWL and can directly contract with them for projects that fit under the terms of the Agreement.

5.c. Measuring Environmental Results: Anticipated Outputs/Outcomes:

Task 1- Cooperative Agreement Oversight: **Progress Measures:** Procurement for LSP; # meetings with LSP; LSP reports to assure workplan goals met; Expenditures and invoices aligned with work completed. **Outputs:** LSP secured; EPA quarterly reports and ACRES updated; Conference attended. **Outcomes:** work completed and funds spent on time; Successful grant closeout

Task 2- Community Outreach & Engagement: **Progress Measures:** # of residents attending public meetings and neighborhood association meetings; Followers on social media; Contacts with stakeholders. **Outputs:** Community Relations Plan/ outreach materials produced; Meeting minutes filed. **Outcomes:**Community engaged and input integrated into redevelopment plan.

Task 3- Site-Specific Assessment Activities: **Progress Measures:** **Measures of Progress:** Relevant documents produced; Field work follows work and safety plans. **Outputs:** Final QAPP; MCP Phase II Comprehensive Site Assmt; MCP Phase III Remedial Action Plan; MCP Phase IV Remedial Implementation Plan; TSCA Risk-Based Cleanup/Disposal Plan; Remedial Action Plan. **Outcomes:** Comprehensive Assmt. of 11.4 acres of brownfield; Site ready for cleanup.

Task 4- Oversee Site Assessment: **Progress Measures:** # of meetings with LSP; # of meetings with developers; # of meetings with City Depts. to coordinate Complete Streets work; # field inspections. **Outputs:** Field visits; Remediation plans approved; Closeout reports submitted. **Outcomes:** Efficient, safe Site Assmt; Site remediation plans and Redevelopment plans in place.

5.d. Past Performance and Accomplishments / Currently has an EPA Brownfields Grant

5.d.i. 1. Accomplishments: The City has successfully completed and closed out several EPA Brownfield grants and has one currently ongoing. Accomplishments in ACRES, include:

1) **2015 Area Wide Planning grant (TR96192401) Current Grant- To date, Outputs:** Two public meetings held; One rail trail walk with 40 stakeholders; **Outcomes:** a) Florence St. lots

(24,000 square feet) along RR corridor planned for housing; b) Covanta Property: parking lot planned and \$1.2 M leveraged to fund 100% of rail trail construction design.

2) **2012 Assessment grant (BF96170001)** **Outputs:** 8 Phase I, 1 Phase II ESA **Outcomes:** a) Assessment work of Ferrous Site led to a \$2.3M Gateway City Parks grant to transform area into a park; b) 9 Osgood property sold to minority business owner for \$500K AND 20 jobs produced; c) Public safety/ training facility planned at 41 & 55 Lowell St; d) Assessment work at 100 Parker St. assisted with air quality determinations relating to remnants of an underground storage tank allowing Habitat for Humanity leveraging \$2M for 10 first time home buyer condos; e) Portion of 20-30 Island St. incorporated into Ferrous park and onsite building demo planned.

3) **FY08 - Cleanup grant (BF 97197301)** **Outputs:** One Phase III ESA **Outcomes:** Covanta Site developed into a 5-acre riverfront park with community gardens and walking trails along the Spicket River. Over \$1.1M leveraged fund by City partner GWL. Awarded the 2011 Gabe Zimmerman Public Service Award from National Community Development Assoc. for outstanding use of CDBG funds and 2010 Brownfield Renewal Award for Social Impact.

4) **FY 07 Assessment grant (BF 97185301)** **Outputs:** 9 Phase I, 5 Phase II, 2 Phase III **Outcomes:** 5.5 acre former foundry redeveloped into 60 affordable rental units, retail space, and energy efficient facilities with playground, community gardens, financial literacy center, and green space with access to Merrimack river and future Riverwalk.

5) **FY07 Cleanup grant (BF 97185201)** **Outputs:** One Phase III ESA **Outcomes:** Project in conjunction with the Gateway Parking Lot and an adjacent brownfield redevelopment project resulted in a 850 space parking lot and passive recreation park.

5.d.i 2. Compliance with Grant Requirements: Since 1996 the city has received \$2.1 M in EPA Brownfields grants. For all open and closed grants the City has complied with grant requirements including workplan, schedule, terms and conditions, quarterly and financial reports and timely ACRES updates. The history of Lawrence's EPA Brownfield's grants include:

History	Term	Type	Amount	Status	Funds Left
FY15 TR96192401	10/1/15 – 9/30/18	A.W. Plan	\$200K	Open	\$57,735
FY12 BF96170001	10/1/12 - 9/30/15	Assess	\$400K	Open	\$8.56
FY08 BF97197301	9/1/08- 8/31/11	Clean up	\$150K	Closed	\$0.00
FY07 BF97185301	10/1/07- 10/1/10	Assess	\$400K	Closed	\$0.00
FY07 BF97185201	10/1/07- 10/1/10	Clean up	\$200K	Closed	\$0.00

Open grants progress: **FY15** TR96192401- Ahead of schedule for program goals and financial expenditures. Final Public Meeting to present Draft Area Wide Plan scheduled for 12-7-16.

FY12 BF96170001- We were given a one year extension until Sept, 30, 2016 and are in the 90 day close out period which ends on Dec, 30, 2016. All funds except \$8.56 expended.

Appendix 3

Appendix 3 - Regional Priorities Form/Other Factors Checklist

Name of Applicant: CITY OF LAWRENCE, MA

Regional Priorities Other Factor

If your proposed Brownfields Assessment project will advance the regional priority(ies) identified in Section I.F., please indicate the regional priority(ies) and the page number(s) for where the information can be found within your 15-page narrative. Only address the priority(ies) for the region in which your project is located. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal, it will not be considered during the selection process.

Regional Priority Title(s): ERA Region 1
COORDINATED PUBLIC FUNDING FOR BROWNFIELDS.

Page Number(s): 12

Assessment Other Factors Checklist

Please identify (with an **X**) which, if any, of the below items apply to your community or your project as described in your proposal. To be considered for an Other Factor, you must include the page number where each applicable factor is discussed in your proposal. EPA will verify these disclosures prior to selection and may consider this information during the selection process. If this information is not clearly discussed in your narrative proposal or in any other attachments, it will not be considered during the selection process.

Other Factor	Page #
<i>None of the Other Factors are applicable.</i>	
Community population is 10,000 or less.	
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Target brownfield sites are impacted by mine-scarred land.	
Project is primarily focusing on Phase II assessments.	
Applicant demonstrates firm leveraging commitments for facilitating brownfield project completion by identifying amounts and contributors of funding in the proposal and have included documentation. <i>DOCUMENTATION of Leveraging</i>	<i>p 10 X</i>
Recent (2008 or later) significant economic disruption has occurred within community, resulting in a significant percentage loss of community jobs and tax base.	<i>p 1, 5 X</i>
Applicant is one of the 24 recipients, or a core partner/implementation strategy party, of a "manufacturing community" designation provided by the Economic	<i>Waiver</i>

Attached

Development Administration (EDA) under the Investing in Manufacturing Communities Partnership (IMCP). To be considered, applicants must clearly demonstrate in the proposal the nexus between their IMCP designation and the Brownfield activities. Additionally, applicants must attach documentation which demonstrate either designation as one of the 24 recipients, or relevant pages from a recipient's IMCP proposal which lists/describes the core partners and implementation strategy parties.	
Applicant is a recipient or a core partner of HUD-DOT-EPA Partnership for Sustainable Communities (PSC) grant funding or technical assistance that is directly tied to the proposed Brownfields project, and can demonstrate that funding from a PSC grant/technical assistance has or will benefit the project area. Examples of PSC grant or technical assistance include a HUD Regional Planning or Challenge grant, DOT Transportation Investment Generating Economic Recovery (TIGER), or EPA Smart Growth Implementation or Building Blocks Assistance, etc. To be considered, applicant must attach documentation.	
Applicant is a recipient of an EPA Brownfields Area-Wide Planning grant.	Xp 14, 15

**LETTER FROM THE STATE
ENVIRONMENTAL
AUTHORITY**



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

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

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

November 28, 2016

U.S. EPA New England
Attn: Frank Gardner
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

RE: STATE LETTER OF ACKNOWLEDGMENT
City of Lawrence, Application for EPA Assessment Grant Funds, Lot #2, Former Tombarello & Sons, Inc.

Dear Mr. Gardner:

I am writing to support the proposal submitted by the City of Lawrence (City) under the Fiscal Year 2017 U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant Program. The City is seeking funding to conduct assessment of Lot #2, Former Tombarello & Sons. Lot #2 comprises a portion of the larger former Tombarello & Sons, Inc. property that has documented releases of hazardous material and is listed with the Massachusetts Department of Environmental Protection (MassDEP) under Release Tracking Number (RTN) 3-0018126. Documented contamination consists of volatile organic compounds, semi-volatile organic compounds, metals and PCBs. The lot consists of 11.7 acres of land and the City hopes to secure a large anchor grocery store after assessment and redevelopment.

On January 23, 2015 Governor Baker signed his first Executive Order, creating the Community Compact Cabinet, in order to elevate the Administration's partnerships with cities and towns across the Commonwealth. Lieutenant Governor Polito chairs the cabinet, which concentrates financial, technical, and other resources at the state level to a select group of projects, including Brownfields. The City's compact was signed on September 23, 2015, ensuring any funding provided by EPA will be supported by a focused commitment of state resources.

We greatly appreciate EPA's continued support of Brownfield efforts here in Massachusetts.

Sincerely,

Rodney Elliott
Brownfields Coordinator, Bureau of Waste Site Cleanup

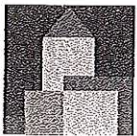
cc: Abel Vargas, Business and Economic Development Director, City of Lawrence
Joanne Fagan, Brownfields Coordinator, MassDEP Northeast Regional Office
Angela Gallagher, Assistant Brownfields Coordinator, MassDEP Southeast Regional Office

NARRATIVE PROPOSAL ATTACHMENTS

- Documentation of Committed Firm
Leveraged Resources
- Letters of Commitment from
Community Organizations

DOCUMENTATION OF COMMITTED FIRM LEVERAGED RESOURCES

- MA Development
- City DPW- Chapter 90
- City OPD- HUD CDBG (2019)



MASSDEVELOPMENT

99 High Street
Boston, Massachusetts
02110

December 14, 2016

Tel: 617-330-2000

800-445-8030

Fax: 617-330-2001

www.massdevelopment.com

Mr. Daniel Rivera
Mayor
City of Lawrence
200 Common Street
Lawrence, MA 01840

RE: 207 Marston Street (former Tombarello Junkyard), Lawrence, Massachusetts

Dear Mayor Rivera:

I am writing this letter to support the City of Lawrence's efforts to obtain \$200,000 in FY17 Brownfields Remediation grant funding in the hazardous materials category from the U.S. Environmental Protection Agency. As an Agency that frequently partners with you on advancing economic development projects on Brownfield sites, I am confident that you will use these funds to effectively advance the work needed to conduct additional environmental assessment and ultimately redevelop the long-blighted and fallow site at 207 Marston Street, Lawrence into an economic generator for the City.

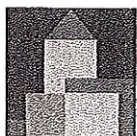
CHARLES D. BAKER
Governor

KARYN E. POLITO
Lieutenant Governor

JAY ASH
Chairman

MARTY JONES
President and CEO

As you are aware, MassDevelopment invested funds for site assessment and redevelopment concepts for this property beginning in 2003, when it was privately owned. We have continually maintained a high interest in redeveloping this key parcel and were enthusiastic to join the multi-agency working group that you convened in 2015 to initiate taking the property by tax title, outlining the steps required to advance comprehensive site assessment, and start building a framework to redevelop the site. In our role as the Commonwealth of Massachusetts' economic development agency and administrator of its Brownfield Redevelopment Fund (BRF), we are committed to leveraging our combined resources to assist the City with turning this 13 acre eyesore into a transformative development for the area. Our Real Estate Services Division is currently preparing a scope of work on behalf of the City that will provide technical assistance in determining highest and best uses, market valuation and evaluate transportation improvements that will eventually be required; we anticipate that this work will commence in early January 2017.



MASSDEVELOPMENT

99 High Street
Boston, Massachusetts
02110

Tel: 617-330-2000
800-445-8030

Fax: 617-330-2001

www.massdevelopment.com

Critical to the parcel's successful renewal is remediation funding. MassDevelopment has deployed over \$78 million in funds since the BRF was created in 1998 but recapitalization remains flat while demand for remediation funds continues to grow, requiring Agency to look to partners like the City and other regional agencies to provide additional capital for project work. Together, we can ensure that scarce dollars have a multiplier effect and seed future development. Our ability to jointly contribute funds and technical expertise will ensure that the City has the capacity to lay the groundwork for future development opportunities on the 207 Marston Street site.

We fully support your efforts to secure these much needed remediation funds so that our Brownfield partnership can advance this project for the residents of Lawrence.

Sincerely,

Eleni Varitimos

Vice President
Community Development

CHARLES D. BAKER
Governor

KARIN E. POUTO
Lieutenant Governor

JAY ASH
Chairman

MARTY JONES
President and CEO



12-14-16

Mayor Daniel Rivera
City of Lawrence
200 Common St.
Lawrence, MA 01840

Subject: Commitment Letter for Brownfield Site Specific Assessment Grant
Tombarello Site Lot #2

Dear Mayor Rivera,

The Department of Public Works (DPW) is pleased to support the City's FY2017 Brownfield Site Specific Assessment application to the EPA and commits \$100,000 of Chapter 90 funds toward roadwork and sidewalk improvements.

The Marston St. corridor is in need of infrastructure improvements and is a priority for the City's Complete Streets projects. Residents of the neighborhood chief complaint, in addition to the blighted brownfield site, is the heavily congested and unsafe road and walking conditions along Marston St. By coordinating our roadwork and sidewalk improvements with the assessment of the Tombarello Site, we will be able to efficiently create a safer, more walkable neighborhood for residents and prepare the area for increased traffic flow that will result from the redevelopment.

We look forward to working with you on this important project and believe our work will contribute to its overall success.

Sincerely,

Lance Hamel
Acting Director of Public Works



CITY OF LAWRENCE
Office of Planning & Development

DANIEL RIVERA
Mayor & CEO

19 Dec. 2016

—
THERESA PARK
Planning Director

Mayor Daniel Rivera
City of Lawrence
200 Common St.
Lawrence, MA 01840

ABEL VARGAS
Business & Economic
Development Director

Subject: Commitment Letter for Brownfield Site Specific Assessment Grant
Tombarello Site Lot #2

225 Essex Street
Third Floor
Lawrence, MA 01840
978-620-3510

Mayor Rivera,

—
PASCUAL "PAT" RUIZ
Inspectional Services
Director

The Office of Planning and Development (OPD) fully supports the City's application to EPA for FY2017 Site Specific Assessment funding for Tombarello Site Lot #2. Toward this effort, we commit \$50,000 of HUD CDBG funds in FY2019 to be used toward infrastructure improvements and utility connections.

PETER BLANCHETTE
Building Commissioner

As you know, the OPD team is committed to the economic and community revitalization of our City and the Marston Street commercial corridor is one of our primary focus areas. The assessment and eventual redevelopment of the Tombarello Site will further efforts already underway in the area, including traffic studies already done in this part of Lawrence.

200 Common Street
Room 210
Lawrence, MA 01840

OPD staff is poised to assist with this exciting project and anticipate that the assessment and eventual redevelopment of this site will be a lynchpin in the successful revitalization of our city.

—
www.cityoflawrence.com

Sincerely,


Theresa Park, Director
Office of Planning and Development

LETTERS OF COMMITMENT FROM COMMUNITY ORGANIZATIONS

- Merrimack Valley Planning Commission
- Groundwork Lawrence
- Neighborhood Associations
 - District A
 - Prospect Hill



Merrimack Valley Planning Commission

*plan * develop * promote*

December 14, 2016

The Honorable Daniel Rivera
City of Lawrence
200 Common Street
Lawrence MA 01840

RE: EPA Community-Wide Brownfields Assessment EPA-OLEM-OBLR-16-08

Dear Mayor Rivera:

The Merrimack Valley Planning Commission is pleased to support and commit coordination, outreach and administrative assistance in implementation of program resources for Brownfields assessment and redevelopment.

MVPC began as the Central Merrimack Valley Regional Planning District in 1959, and was established as a corporate public body in accordance with Section 3, Chapter 40B of the Massachusetts General Laws. Progressively over the years, town by town and city by city was added to our charter, until we became the Merrimack Valley Planning Commission (MVPC) in 1971, encompassing 15 constituent communities across the Merrimack region which includes Lawrence, MA.

MVPC with EPA Brownfields funding resources makes available Brownfields redevelopment financing through the regional Brownfields Assessment Program and Merrimack Valley Revolving Loan Fund. We commit, with continued EPA funding assistance, to target Lawrence identified sites as priorities for redevelopment assistance

As a member of EPA's Making a Visible Difference Initiative, the MVPC supports Lawrence's efforts in bringing additional resources for planning and assessment of Brownfield sites in Lawrence. In addition to targeting RLF funds, the MVPC will provide meeting space as needed, assist in reuse planning and recruitment of companies to move into these Brownfield sites which will be assessed with this EPA assessment grant.

MVPC looks forward to working with the City of Lawrence in this cooperative Brownfields initiative among the state, city and regional partners.

Sincerely,



Joseph Cosgrove
Environmental Program Manager

160 Main Street, Haverhill, MA 01830

phone - 978-373-0549 • fax - 978-372-4890

Serving the communities of:

Andover, Amesbury, Andover, Boxford, Georgetown, Groveland, Haverhill, Lawrence, Merrimack, Methuen,
Newbury, Newburyport, North Andover, Roxbury, Salisbury, West Newbury



December 14, 2016

Mayor Daniel Rivera
City of Lawrence
200 Common Street
Lawrence MA 01840

RE: EPA Targeted Assessment Grant for the Tombarello site

Dear Mayor Rivera,

Groundwork Lawrence (GWL) has been making change happen since its beginnings in 1999. Through our environmental and open space improvements, healthy food access programs, youth education, employment initiatives, community programming and events, GWL creates the building blocks of a healthy community and empowers Lawrence residents to improve their quality of life.

As you know, GWL has a long history of partnering with the City of Lawrence on brownfield revitalization work which has resulted in over \$21 million invested in place-based projects. As we work together to complete the current EPA brownfield area-wide planning project for the Manchester Lawrence railroad corridor, we look forward to our next brownfield partnership with the City revolving around the Tombarello Site and the Merrimack Street corridor improvement project. We strongly support the City's application to EPA for the FY2017 Targeted Assessment funding so that this long-time contaminated eyesore can begin to contribute positively to the economic and community revitalization of our City.

As a partner with the City, GWL will assist with outreach and community engagement, help organize public meetings and contribute to assessment, planning and implementation phases of the project. Through our Environmental Technical Training Program, offered in partnership with the Merrimack Valley Workforce Investment Board, we will work with the City to connect graduates of the EPA funded program with contractors working at this site.

GWL is enthusiastic about partnering with the City in the Targeted Assessment and redevelopment of the Tombarello property. Please contact me at 978-974-0770 x7009 or hmcmann@groundworklawrence.org if you have any questions or if I can be of further assistance as the project moves forward.

Sincerely,

Heather McMann, Executive Director

District A Neighborhood Association
Lawrence, Massachusetts

7 December 2016

Dear Mayor Rivera,

On behalf of the District A Neighborhood Association, I want to let you know how pleased we are that the City is applying for EPA FY 2017 Brownfield Assessment funds to further assess the Tombarello Site. Our members want this Site cleaned up and redeveloped and believe it's important to know more about the contaminants on the Site. Our Neighborhood Association will support this effort by inviting the Neighborhood Planner and other City officials to our monthly meetings, keeping our membership aware of the project and promoting the public meetings.

District A Neighborhood Association is made up of diverse community members of the City of Lawrence dedicated to improve and promote the image of our city and neighborhood. We connect with residents both in English and Spanish at our monthly meetings where all are welcome.

The Tombarello Site needs to be addressed immediately. For too long, the neighborhood has had to deal with this hazard. We are supportive of the project to assess the site because it will accelerate the process to make Lawrence better.

Our association fully supports this application. We want this site assessed for cleaned up and redeveloped so that we no longer have a public health threat and eyesore in our neighborhood. If you have any questions, please contact me at (978) 303-7243.

Sincerely,



Maria De La Cruz, President
District A Neighborhood Association
MariaDLC@yahoo.com



The Prospect Hill and Back Bay Neighborhood Association Inc.

It was, it is, and it will be a great place to live



December 14, 2016

Dear Mayor Rivera,

The Prospect Hill/Back Bay Neighborhood Association wholeheartedly supports the City's efforts to cleanup and redevelop the Tombarello Site and we support its FY2017 EPA Brownfield Assessment application. We want to know more about the contaminants on the Site so that the eventual cleanup can occur effectively and safely. Our membership wants to support this effort and pledges to make our monthly meetings open to the Neighborhood Planner and other officials and to encourage attendance at the public meetings to be held about the project. We also will keep our members updated on project progress.

The Prospect Hill/Back Bay Neighborhood Association is made up of a wide variety of neighbors that believe our neighborhood is and will always be a great place to live. We connect with residents by hosting events that allow us to share foods, cultures, concerns and ways to keep making Lawrence better.

The Tombarello Site has been a major concern for too long. Cleaning and improving the site will have a beneficial impact for our neighborhood and its children. For these simple reasons, we support the project.

Our members have long wanted this vacant, abandoned eyesore redeveloped so that it becomes a positive asset in our neighborhood. We are happy that the City is outreaching to us about this project and strongly hope that this application is funded. If you have any questions, please contact me at 978-688-3446.

Sincerely,

David Struffolino, President
Prospect Hill/Back Bay Neighborhood Association

DOCUMENTATION OF ALL APPLICABLE THRESHOLD CRITERIA

- Justification of Requested Waiver

III. B. Threshold Criteria for Assessment Grants

1. Applicant Eligibility

The City of Lawrence is a General Purpose Unit of Local Government and is therefore an eligible applicant for this grant. It was chartered as a City in 1853 and the present municipal charter was adopted on October 17, 1983.

2. Community Involvement

The City of Lawrence and its project partners are committed to thoughtfully engaging all potential stakeholders throughout the assessment process and remedial planning and will implement an engagement plan that focuses on equity and inclusion.

Prior to submitting this proposal, the City engaged the community through a public meeting at the Redeemer Lutheran Church, located less than 1/2 mile from the Site. The project team presented the findings of the recent target brown fields assessment work, discussed safety and health, the goals of the proposed Site specific assessment, discussed redevelopment options. Prior to the meeting, outreach staff from the City and Groundwork Lawrence (GWL) canvassed neighborhoods adjacent to the site to promote the meeting and answer any questions residents had. The project team attended the Prospect Hill and the District A Neighborhood Associations to review the project and promote the public meeting. The meeting was attended by nearly 40 residents. Feedback from residents is included in this proposal and will continue to inform during the project implementation.

Engaging the community in the Tombarello Site project will require working at multiple levels to ensure equity and inclusion for those who live and work nearby. Many of these stakeholders have expressed strong support for the city taking ownership of the property because they have long wanted previous property owners to implement remedial actions and commence reuse planning. These primary stakeholders will have direct contact with the City's PM to ensure they feel included and allay any concerns about the risks to public health and safety. The PM will be a continual point of contact with the public to address any on-going concerns. All communication will be in Spanish and English using multiple medium. Contact will be established through direct outreach and will include door knocking, literature distribution, and updates at neighborhood association meetings. The City commits to using social media and a project website to broadcast project updates and provide links to assessment and remedial planning documents. A Facebook page has been created and will be used ongoing to share information. The city will implement two public meetings at project milestones to ensure transparency, equity, and inclusion.

The PM has an established rapport with local businesses and developers interested in the Site. As the project progresses, he will continue this communication and expand this outreach to other potential developers who align with redevelopment strategies.

Safety is a prime consideration since the site is located 500 ft. from a school, adjacent to housing and many single mothers with children live in the area. Public meetings will address citizen concerns around health, safety, and community disruption and educate the public about methods implemented to ensure safety. To ensure activities are protective of the sensitive populations identified, the following strategies will be used: QEP oversight, fence and camera around property, warning signs in multiple languages, and monitoring of fugitive dust emissions.

III. C. Additional Threshold Criteria for Site-Specific Proposals Only

1. Basic Site Information

- (a) Name: Tombarello Site Lot #2
- (b) Address: 207 Marston St., Lawrence, MA 01841
- (c) Current Owner: City of Lawrence

2. Status and History of Contamination at the Site

- (a) The site is contaminated by hazardous substances.
- (b) Currently the property is vacant. From about 1941-December 1998, the site was owned and operated by John C. Tombarello & Sons, Inc. as a scrap metal recycling facility. Prior to 1935, the southern portion was the site of a soap manufacturer. In December 1998, the site was sold to American Recycling, Inc. which continued to operate under the name Tombarello & Sons. It accepted a wide variety of scrap metal including crushed automobiles, storage tanks, machinery, and computer parts. In order to extract precious metals from the computers, an extraction process using cyanide was used. Eventually, the Site was abandoned by American Recycling, the mortgage foreclosed and First Lawrence Financial, LLC became the mortgage holder. A truck driving school operated on the Site for a short time in 2006. In 2016, the City of Lawrence acquired the Site through tax taking since American Recycling of Massachusetts owed \$1.4 million in back taxes. Lot #2 is occupied by three buildings and three concrete slabs that are remnants of past operations as a scrap metal recycling facility. One building is a wood-framed former residence that has suffered structural damage due to a fire, the other two buildings are former industrial use structures that are steel-framed with concrete block and brick construction. The concrete slabs are reported to have been used for baling and shearing during metals recycling operations. A prominent feature on Lot #2 is a soil berm that is present along the southern and eastern property boundaries. This berm is 15 to 20 feet high, and was reportedly created by pushing surface soils from the interior to the perimeter. Additionally, there are several soil and debris piles located on the site. Measurements made during a 2016 assessment indicated the volume of soil present above grade at the site (between berms and soil piles) is approximately 25,000 cubic yards.
- (c) **PCB Contamination in Soil:** PCBs have been detected throughout the Site in both surface (0-1 foot bgs) and subsurface soils (greater than 1 foot bgs). The vast majority of contaminated soil is located within 5 feet of the ground surface. The primary exception to this rule is the berm, where contaminated soils have been identified up to 15 feet below the top of the berm. PCB concentrations have ranged from non-detect to 1,300 mg/kg. In most areas, soils contain less than 50 mg/kg PCBs, but portions of the soil berms and several stockpiles contain PCBs above 50 mg/kg. **Metals Contamination in Soil:** Arsenic, chromium and lead have been detected throughout at concentrations that exceed their respective Massachusetts Contingency Plan (MCP) Method 1 risk assessment soil standards. The heavy metal most frequently is lead with concentrations that have exceeded standards in most of the soil samples collected, with a maximum concentration of 10,000 mg/kg. **PAH Contamination in Soil:** PAHs have been detected throughout above applicable MCP Method 1 S-1 Soil Standards. PAHs were detected above Method 1 standards in most of the soil samples during a 2016 investigation. **Groundwater Contamination:** Low concentrations of VOCs and SVOCs have been detected in groundwater samples collected

from on-site monitoring wells. The only contaminant present above risk-based screening values in groundwater is lead.

(d) The Site became contaminated through its use as a scrap metal recycling facility. In 1998, about 20-30 gallons of heat transfer oil were released to soils at the Site from a scrap heat exchanger that was being delivered to the Site. Metal contamination comes from anthropogenic materials that became commingled with soils during historical Site operations. SVOCs and EPH contamination can be attributed to smaller localized petroleum releases and/or anthropogenic materials that became commingled with soils during historical Site operations. When surface soils were pushed to the eastern and southern property lines, contamination was spread throughout the area.

3. **Brownfields Site Definition**

- (a) The Tombarello Site is not listed nor proposed for listing on the National Priorities List.
- (b) The Site is not subject to unilateral administrative orders, court orders or administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
- (c) The Site is not subject to the jurisdiction, custody, or control of the United States Government.

4. **Enforcement or Other Actions**

The City of Lawrence is not aware of any outstanding environmental enforcement actions related to the Tombarello Site. The City is not aware, or received or been furnished copies, of any inquiries or orders from any state or federal agencies related to the contamination of, or hazardous substances at, the subject property. There is a United States CERCLA lien dated January 4, 2011, on the property that remained undisturbed by the Final Judgment in the tax lien case between the City of Lawrence and American Recycling of Massachusetts, Inc. However, the statute of limitations freed the City unless there is a windfall. According to EPA Region I there is no lien on the property that EPA plans to pursue.

5. **Sites Requiring a Property-Specific Determination**

Based on our review of the Property-Specific Determination criteria and with consultation from EPA Region I, the Tombarello Site is not subject to this determination.

6. **Site Eligibility and Property Ownership Eligibility**

(a) **Property Ownership Eligibility - Hazardous Substance Sites**

(1) **CERCLA §107 Liability**

The City of Lawrence is eligible for one of the liability defenses under CERCLA under the local government exclusion for involuntarily acquiring the property for owed taxes.

(2) **Information on Liability and Defenses/Protections**

Applicant owns the site

(a) **Information on the Property Acquisition**

- i. The property was acquired through tax foreclosure.

- ii. The property was acquired on 5/9/2016.
- iii. The property was acquired from American Recycling of Massachusetts, Inc.
- iv. The City of Lawrence has no affiliation with American Recycling of Massachusetts, Inc. or with any other previous owners or operators.
- b. Timing and/or Contribution Toward Hazardous Substances Disposal
All disposal of hazardous substances occurred prior to the City's acquisition of the Site and the City did not cause or contribute to any release of hazardous substances at the Site. The City has never arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.
- c. Pre-Purchase Inquiry
 - i. The City acquired the property involuntarily through tax taking and therefore this question is not applicable.
 - ii. The City acquired the property involuntarily through tax taking and therefore this question is not applicable.
 - iii. The City acquired the property involuntarily through tax taking and therefore this question is not applicable.
- d. Post-Acquisition Uses
The property has been vacant since the City acquired it in May 2016.
- (e) Continuing Obligations
 - i. *Continuing Releases*: The City of Lawrence is not aware of any continuing releases from the Site. Groundwater beneath the Site is not used as a source of drinking water and the Targeted Brownfields Assessment Report dated September 2016 did not detect significant groundwater contamination.
 - ii. *Future Releases*: All contaminants of concern are contained within the Site boundaries and no significant groundwater contamination has been detected to date. The Site is secured by a locked chain link fence.
 - iii. *Prevent or Limit exposure to any previously release hazardous substances*: The City of Lawrence has secured the perimeter of the Site with a locked chain link fence with warning signs posted. A City staff person is driving by the Site 3X/week to check on the integrity of the fence and if there are problems, they would be reported to the DPW for remediation.

The City of Lawrence commits to:

 - i. Complying with all land-use restrictions and institutional controls;
 - ii. Assisting and cooperating with those performing the cleanup and provide access to the property;
 - iii. Complying with all information requests and administrative subpoenas that have or may be issued in connection with the property and
 - iv. Providing all legally required notices.

Tombarello Site Lot #2 is a 11.4-acre parcel involuntarily owned by the City of Lawrence through tax taking. It is a former scrap metal recycling facility abandoned since 2001 that left behind extensive soil contamination. PCB contamination is present in soil throughout the Site in excess of 1 mg/kg, which is the default State and Federal threshold for unrestricted use. Over approximately half of the site, the concentration of PCBs in soil exceeds 10 mg/kg. This would constitute an Imminent Hazard as defined by the Massachusetts Contingency Plan (MCP) and 2-hour reporting condition if not for the fence around the property since PCB contamination is in surface soils and the Site is located within 500 feet of residential dwellings and a school. Historical relocation of surface soils to create berms on the eastern and southern property boundaries has spread PCB and other contamination throughout the site.

A 2016 Targeted Brownfields Assessment (TBA) Report identified five “hot spots” where PCB contamination is 100+ mg/kg, 14 samples with a PCB concentration range of 50-100 mg/kg and 41 samples where PCB contamination was 10-50 mg/kg. In addition, five samples collected during the 2016 investigation revealed lead contamination above MCP Upper Concentration Limit (UCL) and three samples exhibited chromium concentrations that exceeded MCP UCLs.

The TBA identified data gaps which will be assessed with this grant to help characterize the extent of contamination in order to refine remedial cost estimates. These include: 1) PCB, PAH, and metals; 2) Hazardous building materials survey of three existing structures to identify and quantify asbestos, lead-based paint, PCBs, and other universal wastes present in these structures; 3) Sampling of concrete slabs located throughout the Site for PCBs and petroleum hydrocarbons to determine proper off-site reuse/disposal options; 4) Identification of outfall/discharge points and collection of samples for PCB analysis to determine the potential for contamination to migrate off-site via drainage structures or surface runoff features; 5) Human health and environmental risk assessment work to facilitate and inform risk management decisions so that a presumed containment remedy is verified to be protective of human health and the environment; and 6) Preparation of project planning documents to comply with MCP and TSCA requirements for response actions and cleanup plans.

Due to the size of the parcel and the fact that contamination is widespread, present both below ground (soil) and above ground (building materials), includes a wide range of contaminants, and is being regulated under both State and Federal programs, assessment of this site is expected to be costlier than is typical. The City anticipates approximately \$292K for field investigations to collect the data necessary to support risk assessment and remedial design, and approximately \$58K for environmental consulting, data management, risk assessment, risk management, regulatory compliance reporting, and remedial design.

Lawrence is a MA Economically Distressed Area based on high poverty, unemployment, job loss and commercial vacancy. The global **economic downturn of 2008 hit this area particularly hard** and the **downsizing or closing of several manufacturing plants since then has resulted in the loss of over 500 jobs**. In 2010, it had a \$27 million operating deficit prompting the State to appoint a fiscal overseer. Lawrence has not experienced significant revitalization in over three decades and recent industry closings have exacerbated the problem. It is the poorest City in MA. It's high poverty rate, vacant commercial sites and 273 unmarketable brownfield sites results in a very limited tax base. The City is owed \$21 million in back taxes on multiple properties and cannot come up with the extra funding necessary to thoroughly assess Tombarello Site Lot #2.