



**Remediation and Redevelopment of Brownfields Sites
at the Ludlow Mills Complex, Hampden County, Massachusetts**

Submitted by Westmass Area Development Corporation, November 16, 2022

- 1. Applicant Identification:** Westmass Area Development Corporation
One Monarch Place, Suite 1350
Springfield, MA 01144
413-593-6421
www.westmassdevelopment.com

- 2. Funding Requested:**
 - a. Grant Type:** Multiple Site Cleanup
 - b. Federal Funds Requested:** **\$740,000.00**

- 3. Location:** Town of Ludlow, Hampden County, Massachusetts

- 4. Property Site-Specific Information:**

Site 1: The 300 Series Warehouse Mill Buildings
Ludlow Mills, 100 State Street
Ludlow, Massachusetts 01056

Site 2: Mill Buildings 46 & 58
Ludlow Mills, 0 Riverside Drive
Ludlow, Massachusetts 01056

- 5. Contacts:**
 - a. Project Director:** Sarah la Cour, Vice President of Operations
Westmass Area Development Corporation
One Monarch Place, Suite 1350
Springfield, Massachusetts 01144
413-386-3124 (p)
s.lacour@westmassdevelopment.com

 - b. Chief Executive:** Jeffrey Daley, President & CEO
Westmass Area Development Corporation
One Monarch Place, Suite 1350
Springfield, Massachusetts 01144
413-593-6421 (p)
j.daley@westmassdevelopment.com

- 6. Population:** Town of Ludlow: 21,002 (2020 Census)
Census Tract 8104.03: 4,413 (2020 Census)

7. Other Factors Checklist:

Other Factors	Page #
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	N/A
The proposed brownfield(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	5
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	3
The proposed site(s) is in a federally designated flood plain.	4
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	4
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	4
The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures.	4
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2012 or later) or is closing.	N/A

Regarding the N/A items above, the Community contains a population greater than 10,000; Westmass Area Development Corporation is not, nor will assist, a federally recognized Indian tribe or US territory; the proposed brownfield sites are not impacted by mine-scarred land and the target area is not located within a community in which a coal-fired plant has recently closed.

8. Releasing Copies of Applications. Not applicable because this application does not contain confidential, privileged, or sensitive information.

Should you require further information, please do not hesitate to contact either Sarah la Cour or myself (contact information above).

Sincerely,



Jeffrey Daley
 President/CEO

PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

Located in the Town of Ludlow in Western Massachusetts, the 630-acre, Ludlow Mill Village Target Area¹ has an over 100-year history of textile manufacturing that sustained the local livelihood but has more recently served as a reminder of lost jobs with vacant, decrepit buildings and crime and contamination. The Town suffers from a large number of brownfields and hazardous waste sites; which include 190 waste sites identified by MassDEP and 30 inactive RCRA sites identified by EnviroAtlas, in addition to known brownfields and the vast Ludlow Mill complex. Owned by Westmass Area Development Corporation (Westmass), since 2011, the Ludlow Mill Complex is located within the heart of the target area and within a federally designated **Opportunity Zone**. The Mill Complex once employed over 5,000 people for the production of jute and was one of the primary economic generators for the target area and broader region. It is now a haven for trespassers, crime and contamination threats to current occupants and the surrounding receptors in the target area. The area continues to experience extreme economic hardship, compared to the region and state, as well as a continued downward trend of economic and demographic indicators.² The cleanup of the **300s Warehouses and Mill Buildings 46 & 58** is a critical step in combating the brownfield challenges of the target area by eliminating the hazardous materials in these buildings and allowing for significant economic redevelopment.

Description of the Proposed Brownfield Site(s)

The entire 30-building Ludlow Mills complex is approximately 52 acres and runs along almost 1.5 miles of the Chicopee River, located in a **FEMA Special Flood Hazard Area**³. Most of the mill buildings were constructed at the turn of the 20th century and include several 1 to 8 story, brick and masonry buildings containing approximately 1.2 million square feet (SF). The Mill Complex was historically utilized for various manufacturing operations but primarily textiles and jute. There are currently a mix of manufacturing and entrepreneurial tenants within the complex with businesses ranging from metal fabrication to brewing. Despite continuous clean-up activities, the Mill Complex still has several buildings that remain contaminated with asbestos and lead paint. This includes the two sites identified in this request: **The 300s Warehouse Buildings (Site 1)** where jute was stored and **Mill Buildings 46 & 58 (Site 2)** which were part of the historic railroad infrastructure. Although still containing hazardous materials, these buildings are sound and secure.

The 300s Warehouses: Located adjacent to Mill #11, these are a series of buildings that include a 125,300 SF, 8-story warehouse building and 2, one-story, 22,700 SF warehouses. The 300s Warehouses were constructed between 1910 and 1930 and are concrete and brick construction. They were historically used for storing jute but currently only have a commercial tenant on the first floor. The upper 7 floors are vacant. Asbestos-containing materials (ACM) have been identified in 41,500 SF of roofing and wood deck; in the caulk and glazing of 425 windows and 45 doors; and 2,000 LF of pipe insulation. In addition, ACM and other hazardous materials are contained in 1,500 SF of floor tiles and 600 SF of concrete/cement products.

Mill Buildings 46 & 58: Mill building #46 is the former Locomotive Barn that housed the engines serving the historic mill operation. Built in 1915, the one-story, 2,800 SF, brick structure includes a dirt floor where the rail engines were stored and large windows on the north and south facades. The east side of the building shares a wall with building #58 which was also built in 1915. This two-story, 7,800 SF building was formerly the machine shop and maintenance building. Both buildings are currently vacant. ACM was detected in 4,500 SF of roofing materials on Building 46 and in the exterior glazing of all 10 windows, 30 SF of floor tiles and in 50 SF of corrugated siding. ACM was also detected in the exterior glazing of 20 windows in Building 58. In addition, lead was found in the interior paint of both buildings.

¹ Census Tract 8104.03

² EPA EJScreen: In comparison to State- Low Income 73rd percentile; Unemployment 64th percentile; Limited English Speaking 89th percentile; Less than a high school education 86th percentile.

³ US EPA 2020 Brownfields Success Story (EPA 560-F-20-011)

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

The cleanup work proposed under this EPA grant is a necessary first step of the redevelopment of Mill #11, which is anticipated to leverage up to \$100 million in future private investment. Throughout Brownfields site remediation and redevelopment projects at the Mill Complex, the Town of Ludlow has been a fully supportive partner and continues their involvement. Prior to the purchase of the property by Westmass, the **Ludlow Town Master Plan**, prepared in 2009, identified redevelopment of the historic Ludlow Mills complex as a priority goal for economic development, housing, and land use. Many strategies, including rezoning, indicated that providing continued support for developer investment at the mills was imperative to the local economy and future of the town and region. In 2012, the Town of Ludlow Planning Board granted Westmass a Special Permit for the **Comprehensive Plan for the Ludlow Mills Preservation and Redevelopment Project** in accordance with the revised **Town Mill Redevelopment District** within the Zoning Bylaw. The Comprehensive Planning process included significant public participation and that feedback was incorporated into the final Plan. Also, the complex is located in a federally designated floodplain and floodplain specific redevelopment practices are utilized. In addition, in 2013, the Town approved a **Chapter 40R Smart Growth Overlay District Bylaw** and created a specific Ludlow Mills Mixed-Use Sub-district. This significant zoning change allowed residential uses in the formerly industrially zoned area. Also, the Ludlow Mills Brownfields Redevelopment project has been identified as a regional "High Priority Project" by the **2019 Comprehensive Economic Strategy (CEDS)** prepared by the regional planning agency, Pioneer Valley Planning Commission. The Mill Complex is located within a US Economic Development Administration Economic Distress Criteria.

The 300s Warehouses: Demolition of these buildings is necessary given the 6' ceilings and uneven concrete floors making redevelopment of these buildings unfeasible. Furthermore, their proximity to Mill 11 significantly hinders its future development, which is anticipated to be the largest single-building adaptive reuse project within the historic complex. The footprint of the **300s Warehouses** will be converted into a parking area and future access to maximize Mill 11's reuse potential. This parking area and access will incorporate low-impact development components, including green infrastructure as well as create recreational opportunities via connectivity with the town park and Riverwalk located within the surrounding mill complex and along the adjacent Chicopee River.

Mill Buildings 46 & 58: These attached buildings are currently vacant and underutilized due to the environmental constraints and necessary cleanup. Located at the entry to the Ludlow Mills, near the iconic clocktower, these buildings are anticipated to be adaptively reused as restaurant/retail and associated office space. Their proximity to the public parking associated with the Town-owned Riverwalk and the Chicopee River provides access to recreational opportunities as well as an improved pedestrian connections to downtown Ludlow. The reuse of these buildings will provide increased economic activity for the local community with increased jobs and tax revenue.

ii. Outcomes and Benefits of Reuse Strategy

Developer Reinvestment: The cleanup and reuse of the Ludlow Mills is projected to result in up to \$300 million in private investment and increase the local annual tax revenue by \$2 million. **Job creation:** Over 100 new jobs are expected to be part of the redevelopment of Mill 11 and Buildings 46 & 58 as well as the potential for over 150 new housing units. **Improved health:** Cleanup will remove the threat of hazardous friable ACM and Lead Paint issues for the seniors and children that reside in the target area. **Sustainability and Green Energy:** Westmass will strive to meet the standards of Enterprise Green Communities (EGC), an environmental certification program for affordable housing that includes milestones for water conservation, energy efficiency, healthy materials, and green operations and management. The cleanup and subsequent demolition of the **300s Warehouses** allows for a new parking area and access for Mill 11 which will incorporate low-impact development components, including green infrastructure. As part of redevelopment, rooftop solar on **Mill Buildings 46 & 58** will be considered along with other energy efficiency and climate mitigation measures.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Characterization

No further resources are needed for site characterization at this time. If additional resources are needed for assessment as the project progresses, Westmass will pursue funding through **MassDevelopment** or **US EPA** grant funds or private funds as necessary.

ii. Resources Needed for Site Remediation

The funding being requested in this application is believed to be sufficient to complete the cleanup activities as described. If additional funds are needed, Westmass will pursue other avenues for funding including the **Massachusetts Brownfield Program** through MassDEP which provides technical assistance and financial incentives for cleanup and redevelopment of contaminated properties. In addition, MassDevelopment offers remediation funds through the **Brownfields Redevelopment Fund**.

iii. Resources Needed for Site Reuse

For over a decade, Westmass has a proven track record of leveraging funds from a variety of sources for the assessment, cleanup and successful redevelopment of the historic Ludlow Mills. Since taking ownership of the Mills in 2012, Westmass has secured a variety of State and Federal funding for cleanup activities as well as significant private investment for redevelopment including **MassDevelopment FY23 Site Readiness Funds** for improved electrical systems. Westmass lacks significant resources to commit to large-scale cleanup projects but uses funds as necessary to leverage additional funding to advance redevelopment efforts and will secure the funding package necessary for the demolition of the 300s Warehouses once abated. Private investment opportunities will be pursued through advertising of building sites ready for redevelopment along with incentive programs – e.g. the Massachusetts **Brownfields Tax Credit Program** or the **Brownfields Redevelopment Access to Capital (BRAC) Program** – that may help facilitate site reuse. Additional resources will be pursued including **New Market Tax Credits** for commercial redevelopment. In addition, to further advance the mill complex’s redevelopment, the Town of Ludlow has established a **District Improvement Financing (DIF)** district around the Mills to leverage future tax revenues for short-term infrastructure needs. Several funding sources are currently being utilized for infrastructure and redevelopment activities around these specific sites. (See ATTACHMENT A for documentation of secured funding).

The 300s Warehouses

Source	Purpose	Amount	Status
MA ARPA-DHCD	Mill 11 Roof Replacement	\$1,000,000	Secured- In progress
US EPA	Mill 11 Phase II	\$17,000	Pending

Mill Buildings 46 & 58

Source	Purpose	Amount	Status
MA ARPA- DEP	New Water & Sewer Infrastructure	\$1,000,000	Secured- In progress
MassDevelopment Site Readiness Program	New Electrical Service to Buildings 46/58	\$500,000	Secured- In progress
Westmass Area Development Corp	Buildings 46/58 Phase II Assessment	\$3,500	Secured- Complete
Westmass Area Development Corp	Building 46/58 Adaptive Reuse Conceptual Designs	\$11,900	Secured- Complete

iv. Use of Existing Infrastructure

Redevelopment activities at and around these Brownfields sites within the Mill Complex, will be critically supported by infrastructure upgrades that were recently designed using \$300,000 from MassDevelopment FY22

Site Readiness funds, including new water and sewer and upgraded electrical systems. These improvements are currently being implemented as noted above. Also, in 2012, the Town of Ludlow completed extensive state-funded reconstruction of public water and sewer infrastructure and roadway pavement and sidewalk surfaces along State Street bordering the 300s Warehouses and the Mill Complex. In 2019, the Town of Ludlow, in partnership with Westmass, received \$6.6 million in grant funds from the MassWorks Infrastructure Program and the US Department of Commerce Economic Development Administration (EDA) to construct a 4,200 linear foot roadway and associated water and sewer infrastructure within the mill complex to advance revitalization efforts. Completed in October 2022, Riverside Drive is a public way and provides key frontage, access and infrastructure for the continued redevelopment of the property. This road now provides direct, public access to Mill Buildings 46 & 58. In addition, the Ludlow Mills complex is served by Eversource Electric and Gas and Verizon and Charter Communications.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

The underutilization of the Mill Complex for decades has negatively affected the local community and surrounding area. Following the closure of the Mill Complex in the mid-20th century and the subsequent loss of employment and tax revenues, the target area has become incredibly strained to maintain municipal services. The financial burden of such a large (and predominantly vacant) mill property continues to pose economic challenges to both Westmass and the Town of Ludlow. Combining the reduced tax revenue with the increased cost burden of necessary municipal services, the Town of Ludlow continues to struggle to make large financial investments in the target area. The median household income for the target area is just \$50,417 compared to \$73,516 in the Town of Ludlow and \$84,385 in Massachusetts. In addition, at 9.4%, the number of families living in poverty is higher than that of Massachusetts (6.6%) with children under 5 at a significantly higher rate of 32.2% and 15.7% of seniors over 65 in the tract are living below the poverty level.⁴ The presence of hazardous materials on the sites further compounds the challenges to the adjacent low-income neighborhoods where there is a high rate of unemployment and 59% of the residents are living in rental housing built prior to 1960. The cleanup, and ultimate demolition, of the **300s Warehouses** will allow for significant redevelopment opportunities for Mill 11 into a mix of much-needed, elderly/affordable housing. The current waiting list for affordable housing units in the Mill 10 redevelopment at the Ludlow Mills is 5-8 years. The cleanup of **Buildings 46 and 58** is essential to the increased economic benefit of activated commercial space within the Mills and provides benefits to the residents of the mills and the broader community.

ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations

Asbestos and other toxins such as lead paint, present at these sites in the Ludlow Mills, represent a clear health risk to the children and seniors living in the mill complex and in the adjacent neighborhoods including the former mill village which is 64% low-income with a significant portion living below the poverty level. 16.6% of the population of the target area are children under 15 and 17.4% are seniors over the age of 65. Other disadvantaged populations include 92nd percentile of limited English speaking and 81st percentile of population with less than high school education compared to nationwide data.⁵ In addition, 26.7% of the households in the target area are receiving SNAP compared to 11.6% Statewide.⁶ Removal of the hazardous materials at these sites will mitigate a direct health threat to workers, the senior residents living on site, children in the surrounding residential neighborhoods, workers and patients at the Encompass Rehabilitation Hospital, patrons of the new Ludlow Senior Center on former mill property and those visiting the Riverwalk for recreation and

⁴ American Community Survey and 2020 Census data

⁵ EPA EJScreen Data

⁶ 2020 US Census data

working in the downtown area. The successful redevelopment of the mill complex hinges on this grant that will allow for the cleanup of all hazardous materials that contribute to airborne toxins and air quality issues.

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

In 2019, Health New England completed its Community Health Needs Assessment which included Ludlow in its service area. Ludlow was found to have the second highest rate of **premature birth** and **low birth weight**, just behind the neighboring City of Springfield. Air pollution impacts the morbidity of several chronic diseases that have a high prevalence in Hampden County, including asthma and **cardiovascular disease**, which recent studies have suggested is associated with poor air quality in the region. Mesothelioma, which is linked to asbestos exposure, is 100% more than expected in the community.⁷ Additional health disparities in the target area include 93rd percentile nationwide for Asthma prevalence and 84th percentile in terms of Heart Disease⁸, which can be exacerbated by asbestos exposure. In addition, the target area is 99th percentile for Air Toxics Cancer Risk as well as 75th percentile for Lead Paint as compared to the State.⁹ As roofs and building elements at these sites continue to deteriorate, the emission of toxins related to asbestos and lead contamination could rise. Increased vandalism in the form of regularly broken windows, additionally increases the potential release of toxins into the air causing air-borne health risks. This grant will remove these contaminants, decreasing the exposure of the surrounding residents and mitigating associated health risks.

(3) Promoting Environmental Justice

Located within Block Group 3, Census Tract 8104.03, the Ludlow Mills complex has been identified as a Massachusetts **Environmental Justice Population** based on low-income characteristics according to 2020 data¹⁰. The once significant **disinvestment** in the target area, including the closure of the Mills several decades ago, has contributed to the ongoing issues of low property values and access to well-paying jobs. To help promote environmental justice, Westmass continues to try to attract new investment into the historic mill property including elderly housing developments. Since acquiring the property in 2011, Westmass has worked hard to attract women- and minority-based enterprises to the complex, promote the adaptive reuse of mill buildings for affordable housing (including Mills #8 and 10), and has increased recreational opportunities for nearby residents, in the form of a town park and the heavily used public Riverwalk along the Chicopee River. **Air pollution** is shown to have a significant impact on Ludlow and across Hampden County due to a variety of mobile and point sources; EJScreen related indicators are extremely high (**Air Toxics Cancer** risk 99th percentile in the State and **Ozone** 89th percentile in the State). In addition, the target area is in the 75th percentile for the EJScreen **Lead Paint** Indicator statewide. The target area population will be served and supported by the continued cleanup and redevelopment efforts through the improvement of environmental quality and the creation of new jobs and affordable housing opportunities within Mill 11 and Buildings 46 and 58.

b. Community Engagement

i. Project Involvement and ii. Project Roles

Westmass is a community-based, business organization committed to improving the economy of the Pioneer Valley in Western Massachusetts. Together we work with many local community partners on the cleanup and redevelopment of the Ludlow Mills, including the following:

Project Partner	Point of contact	Specific Role in the Project
Town of Ludlow	Marc Strange, Town Administrator (413) 583-5600 ext. 1201	The project would require approvals from the Town Building Inspector, Fire Department, Department of Public Works, the Historical Commission and the Conservation Commission.

⁷ Mesothelioma for males and females Combined in Ludlow for 2011-2015. Mass. Dept. of Public Health.

⁸ EPA EJScreen Data

⁹ EPA 2017 Pollution Sources Data

¹⁰ The identified EJ Population is 48% of the Massachusetts Median Income compared to the Town of Ludlow which is 85%

Ludlow Council on Aging/ Ludlow Senior Center	Jocelyn Zepke, Director (413) 583-3564	The organizations assist with outreach to the elderly residents of the neighborhood and community.
MassHire Workforce Board	David M. Cruise (413) 755-1362	MassHire assists with tracking benefits of the project in the form of job creation and retention.
Pioneer Valley Planning Commission (PVPC)	Becky Basch, Senior Planner (413) 781-6045	PVPC provides regional social, economic, and health data and assists with monitoring the regional impacts of redevelopment.
Local Elected Officials	Congressman Richard Neal <u>(413) 785-0325</u> Eric Lesser, State Senator <u>(413) 526-6501</u> Jake Oliveira, State Representative <u>(617) 784-5151</u>	Westmass is fortunate to have the continued support of our local elected officials. The Ludlow Mills project has received continuous broad support at the local, state and federal levels. Our consortium of elected officials are valuable advocates for Westmass' work and will continue to help identify funding sources to supplement all cleanup activities and marketing of these sites for redevelopment.

iii. Incorporating Community Input

Westmass will involve the community by: (1) preparing a plan to involve key stakeholders in cleanup activities where appropriate; (2) establishing an information repository at the Ludlow Mills with backup at the Corporate office in Springfield and on the westmassdevelopment.com website; (3) engaging the tenants and residents within the Ludlow Mills Complex, downtown Ludlow and the adjacent neighborhoods; (4) posting public notices in various locations, including online, to gather community input; (5) continue to meet with Town Boards and Commissions to provide updates and solicit feedback; and (6) holding a public meeting remotely to convey information and answering questions regarding all cleanup activities. All community participation methods are designed to ensure remote participation access and safe social distancing protocols per current COVID guidelines. Throughout the process, input and comments will be gathered via a link on the website and through direct contact with Westmass personnel. We will publicize our intent to seek EPA Brownfields Cleanup funding at the Ludlow Mills in both the local newspaper and on its website. Upon award, Westmass will hold a post-award public meeting to solicit comments, distribute the cleanup plan and request input by businesses and residents as well as other stakeholders including the MassDEP, MDOS, Ludlow Board of Health and Ludlow Building Commissioner. All comments and feedback gathered will be carefully considered by Westmass and the QEP and incorporated into the clean-up plan as appropriate. Westmass will respond directly with commentors as necessary for clarification and specific questions or concerns.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Grant funds are being requested for the cleanup of ACM and other hazardous materials within two specific sites at the Ludlow Mills, **the 300s Warehouses and Mill Buildings 46 & 58**, to further revitalization activities at these locations. As part of the overall **Comprehensive Plan for Preservation and Redevelopment** for the Ludlow Mills, the cleanup of these sites is integral to securing private investment for redevelopment. Cleanup for this project involves Westmass procuring a QEP and abatement contractor with the appropriate qualifications to prepare an Asbestos Removal Cleanup Plan including a Health & Safety Plan which will meet all EPA and MassDEP requirements. An Asbestos Notification will be submitted to MassDEP and we will apply for an Asbestos Blanket Notification Approval. The prepared Cleanup Plan will follow current EPA standards for a QAPP and a draft will be submitted to the EPA and the MassDEP for review and approval. Copies of all documents will be placed in a Project Information Repository accessible to the Public. The state-

licensed abatement contractor will remove all ACM and other hazardous materials, for disposal to a licensed receiving facility under a Mass. Asbestos Waste Shipping Record. Monitoring will be performed by a state-licensed asbestos inspector. Removal of the **300s Warehouses** is consistent with the long-term vision for the Ludlow Mills and substantial redevelopment of Mill 11 and the adaptive reuse of **Buildings 46 & 58** reflect the clean-up and preservation of an iconic mill building. Based on the Draft ABCA, the most effective method to eliminate risk at these sites is the complete removal and proper offsite disposal of all hazardous materials. This will eliminate exposure pathways during demolition and redevelopment work and for current tenants and senior residents of the Mills, visitors and workers in downtown Ludlow, residents of the adjacent neighborhoods, and recreational users of the site.

b. Description of Tasks/Activities and Outputs

i. Project Implementation/ii. Anticipated Project Schedule/iii. Task/Activity Lead/ iv. Output

All activities described below are EPA funded.

Task 1: Cooperative Agreement Oversight	
i. Project Implementation	<ul style="list-style-type: none"> Westmass will be responsible for overall project coordination and oversee the Cooperative Agreement with EPA and will conduct a competitive selection process, following public bidding rules, for the procurement of a Qualified Environmental Professional (QEP). The QEP will prepare all cleanup plans; develop an EPA standard QAPP, abatement and post abatement demolition scope, prepare a Public Bid package, with specifications, and conduct the competitive Process for Abatement Contractor selection.
ii. Schedule	Cooperative Agreement Oversight will occur throughout the duration of the grant. Procurement of the QEP will be completed by 9/31/23 with a project kick off in January 2024. The Abatement Contractor will be competitively procured by 4/30/24.
iii.Task Lead	Sarah la Cour, Westmass Project Manager and QEP
iv. Outputs	Final executed Cooperative Agreement; Quality Assurance Project Plan (QAPP); procure QEP and Abatement Contractor; and prepare project progress reports submitted to ACRES database.
Task 2: Community Outreach & Engagement	
i. Project Implementation	<ul style="list-style-type: none"> Westmass will hold a pre-project public meeting with the QEP present to prepare the Community Involvement Plan and notify all appropriate parties of the scheduled cleanup. The QEP will conduct frequent visits, engage in public outreach particularly with the businesses and residents at the Ludlow Mills and surrounding neighborhoods and finalize ABCA with community input.
ii. Schedule	Pre-Project Public Meeting will be held in January 2024. Meetings with community and site stakeholders will be ongoing throughout the tenure of the grant.
iii.Task Lead	Sarah la Cour, Westmass Project Manager and QEP
iv. Outputs	Public meeting; Creation of a Community Involvement Plan and Final ABCAs.
Task 3: Site-Specific Activities	
i. Project Implementation	<ul style="list-style-type: none"> The state-licensed abatement contractor will execute all cleanup activities; follow the approved plan; isolate where the asbestos removal is taking place; and will provide all appropriate measures to

	<p>prevent contamination of workers, disposal and building demolition after abatement. All work will be completed in accordance with state and federal requirements.</p> <ul style="list-style-type: none"> • Air quality monitoring on-site will be conducted during cleanup.
ii. Schedule	Cleanup will start by 5/30/24 and continue through to 4/30/25.
iii. Task Lead	Abatement Contractor with oversight and independent monitoring to be overseen by the QEP and Westmass Project & Construction Managers.
iv. Outputs	Full asbestos and hazardous materials abatement of the two sites.
Task 4: Oversee Site Cleanup	
i. Project Implementation	<ul style="list-style-type: none"> • Westmass will track and report the outputs and outcomes of the cleanup; the amount of private investment made in the site once the asbestos is removed; the amount of tax revenues raised as a result of the reuse of this historic mill complex; and the number of jobs created. All reporting will be made available on the EPA's ACRES database. • Cleanup Oversight will be performed by the QEP
ii. Schedule	Concurrent with Task 3 (5/30/24 - 4/30/25)
iii. Task Lead	Sarah la Cour, Westmass Project Manager and QEP
iv. Outputs	Cleanup Completion Reports & other data submitted to ACRES database

c. Cost Estimates

i. Development of Cost Estimates/ ii. Application of Cost Estimates

Task 1: Cooperative Agreement Oversight:

Personnel: Project Manager at \$100/hr for 70 hours = **\$7,000**- Prepare procurement documents and overall project coordination.

Contractual: Total cost of **\$10,000**

Qualified Environmental Professional (QEP) at \$200/hr for 50 hours - preparation of asbestos removal plans, QAPP, and procurement of abatement contractor.

Task 2: Community Outreach & Engagement:

Personnel: Project Manager at \$100/hr for 60 hours = **\$6,000**– Prepare public meetings, Community Involvement Plan, and engagement with the QEP and stakeholders at the project sites.

Qualified Environmental Professional (QEP) at \$200/hr for 45 hours = **\$9,000.00** for regular site visits, public outreach, and the finalization of the two ABCAs with input from the public.

Task 3: Site-Specific Activities:

Personnel: Project Manager at \$100 /hr for 20 hours = **\$2,000** & Construction Manager at \$100/hr for 90 hours = **\$9,000.00** - Project oversight and coordination with project partners, businesses, and other affected stakeholders, as well as reporting on project activities.

Qualified Environmental Professional (QEP) at \$200/hr for 175 hours = **\$35,000** - Oversight of all cleanup activities by the licensed abatement contractor include monitoring and reporting.

Abatement Contractor: Total contract of **\$644,000**

The 300s Warehouses: \$560,000

- ACM in **41,500 SF** of roofing and decking at \$10 p/SF = **\$415,000**
- ACM in window and door caulking and adhesives in **425 windows and 45 doors** = **\$47,000**
- ACM in **2,000 LF** of pipe insulation, **1,500 LF** of floor tiles and mastic and **600 SF** of concrete/cement products = **\$71,000**

- Regulated hazardous materials including bulbs, ballasts and mercury switches = **\$27,000**
Mill Buildings 46 & 58: \$84,000
- ACM in **4,500 SF** of roofing and wood decking in Bldg 46 at \$4 p/SF = **18,000**; ACM in exterior window glazing in **20 windows** = **\$6,000**; ACM in 80 SF of floor tiles and corrugated siding = **\$4,000**
- LBP in **4,100 SF** throughout interiors = **\$41,000**
- Presumed PCBs in 3 Transformers = **\$6,000**
- Universal wastes/Lights and ballasts = **\$9,000**

Task 4: Oversee Sight Cleanup:

Personnel: Project Manager at \$100/hr for 80 hours = **\$8,000.00** -Tracking and reporting outputs and outcomes of all cleanup activities to EPA’s ACRES database.

Qualified Environmental Professional (QEP) at \$200/hr for 50 hours = **\$10,000** for the remainder of project oversight and closeout of cleanup activities.

Budget Categories		Project Tasks (\$)				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel	\$7,000	\$6,000	\$11,000	\$8,000	\$32,000
	Fringe Benefits	\$0	\$0	\$0	\$0	\$0
	Travel	\$0	\$0	\$0	\$0	\$0
	Equipment	\$0	\$0	\$0	\$0	\$0
	Supplies	\$0	\$0	\$0	\$0	\$0
	Contractual	\$10,000	\$9,000	\$679,000	\$10,000	\$708,000
	Other	\$0	\$0	\$0	\$0	\$0
Total Direct Costs		\$17,000	\$15,000	\$690,000	\$18,000	\$740,000
Indirect Costs		\$0	\$0	\$0	\$0	\$0
Total Federal Funding		\$17,000	\$15,000	\$690,000	\$18,000	\$740,000
Total Budget		\$17,000	\$15,000	\$690,000	\$18,000	\$740,000

d. Measuring Environmental Results

Anticipated environmental results of the project include all sites included in this application being free from hazardous materials, thereby supporting a cleaner, healthier environment within the target area. By cleaning the **300s Warehouses** in preparation for demolition, Westmass is positioning Mill #11 for future redevelopment by remediating a deteriorating, hazardous structure and cleaning **Buildings 46 & 58** for adaptive reuse that contributes to the economic vitality of the target area. Outside of the regular reporting, Westmass will comprehensively assess costs and potential outcomes, including improved health statistics, of this Cleanup Plan. Progress toward achieving outcomes at the proposed sites will be tracked and evaluated by measurable indices including outreach associated with the Community Involvement Plan, investigating future, feasible adaptive reuse opportunities, a final inventory to identify all hazardous materials on the total floor areas, a cost estimate for the Cleanup Plan, and significant public input and reporting in ACRES throughout the project.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure/ ii. Description of Key Staff

Westmass has a long and successful history of utilizing federal and state grant funding to complete cleanup and redevelopment projects and the team collectively has over 40 years of experience in redevelopment projects, finance, and project management. The company has accounting and project management systems in place to track current projects and will separately track all expenditures for the EPA cleanup grant. Westmass has experience with Request for Proposals (RFP) to procure a QEP via a competitive procurement process in

accordance federal regulations and will hire a state-licensed asbestos abatement contractor in accordance with local, state and federal regulations. **Sarah la Cour, VP of Operations**, will serve as the Project Manager for this cleanup grant. Sarah has over 25 years of experience as a project manager and is proficient in all aspects of project management and planning including knowledge of regulations related to development and permitting at the municipal, state, and federal levels. **Jeff LeSiege, VP of Facilities and Construction** will serve as Construction Manager for onsite coordinator of clean-up activities. Jeff has over 20 years of experience in construction supervision and general contracting. **Jeff Daley, President/CEO** will provide corporate oversight but will be funded by Westmass. Jeff has over 15 years of experience in real estate development, public-private partnership development, construction project development, and government relations. In the case of staff turnover, Westmass is confident that the necessary processes and protocols are in place for successful project oversight and accounting.

v. [Acquiring Additional Resources](#)

Westmass has a proven procurement process already in place that has been utilized on four previous rounds of EPA Brownfield Cleanup grants. Westmass will hire a QEP within the first quarter of this award. Procurement will include the preparation and distribution of a Request for Proposals (RFP), ranking of the proposal by Westmass staff, and interview with candidates as part of the hiring process. The QEP as well as licensed abatement contractor(s) will be procured following all state and federal procurement requirements.

b. **Past Performance and Accomplishments**

i. [Currently Has or Previously Received an EPA Brownfields Grant](#)

(1) **Accomplishments**

Westmass was awarded an **EPA FY21 Brownfields Cleanup Grant** to remediate several stockhouses and the former carpentry building that contained ACM in roofing materials and window glazing. This current remediation effort will leverage **\$16.5** million in private development in the form of a restaurant and increased marketability of the mill complex for commercial and manufacturing space. The construction of the \$28,500,000 LEED Gold Certified Encompass Rehabilitation Hospital at Ludlow Mills is a direct result of previous EPA funding for the **Phase I & II ESAs**. Westmass efficiently and successfully expended the funds from an **EPA FY12 Brownfield Cleanup Grant** for the abatement and removal of the discontinued, oil-fired steam heating system. Westmass was also successful in receiving two \$200,000 **FY13 EPA Brownfield Cleanup Grants** for Transite Abatement and Removal projects from buildings #286-291 & #292-296. In addition, Westmass secured grant funding of \$1.5 million for environmental remediation from the state of Massachusetts to remediate 43 areas of Recognized Environmental Concern (RECs) at the Ludlow Mills. In the **FY15 Brownfield Cleanup Grant** round, Westmass was awarded funds for the abatement and removal of asbestos in two connecting structures of Mill #10, which led to its redevelopment into 75 senior housing units. Cleanup efforts as part of the Ludlow Mills Preservation and Redevelopment project have so far generated approximately **\$87,000,000** in private and **\$20,000,000** in public investments. All grant funds were expended and project outputs and outcomes were accurately reported in the ACRES database through project completion.

(2) **Compliance with Grant Requirements**

Westmass has successfully completed four EPA funded Brownfields Cleanup Grants (FY12, two in FY13, and FY15) which involve timely reporting compliant with the approved work plans, schedule, and executed terms and conditions. The US EPA awarded grant funds for these projects have been fully expended. Westmass has a solid history of timely and acceptable quarterly reports and other grant deliverables as well as continuing to update the ACRES reporting database. In addition, Westmass entered into a Cooperative Agreement in August 2021 for an EPA FY21 Brownfields Cleanup Grant and is currently working on those cleanup activities in connection with our Region 1 Project Manager and Coordinator. The EPA portion of this grant has been fully expended and only the cost-share funds remain to complete the project. Project completion will be before the end of the period of performance.

ATTACHMENT A: Documentation of Leveraged Resources

**Department of Housing and Community Development (DHCD)
Earmark – Statement of Work
Attachment A**

Vendor/Grantee:	Westmass Area Development Corporation
State Fiscal Year:	FY2022 – FY2023
Legislative Language:	provided further, that not less than \$2,000,000 shall be expended for the Westmass Area Development Corporation for redevelopment and expansion of properties for continued predeveloped expenses associated with additional growth opportunities of affordable housing at the Ludlow Mills
Briefly describe work to be completed:	<ul style="list-style-type: none">• Re-roof (rip and replace) 73,450 sq. ft. of a roof on Mill #11 at the Ludlow Mills<ul style="list-style-type: none">○ Cost is \$1.05M• Prepare an onsite parking area for the build out of 95 housing units in Mill #8 at the Ludlow Mills<ul style="list-style-type: none">○ Cost is \$600,000• Relocate and replace Water & Sewer piping to support housing in Mill #8 at the Ludlow Mills – currently 2 other mill buildings water & sewer are piped through Mill #8 which will be sold for the development of housing.<ul style="list-style-type: none">○ Cost is \$75,000

ATTACHMENT A - SCOPE OF SERVICES AND ADDITIONAL TERMS AND CONDITIONS

INSTRUCTIONS: In order to ensure that the Department and the Contractor have a clear understanding of their respective responsibilities and performance expectations, the following attachment shall contain a specific detailed description of all obligations, responsibilities and additional terms and conditions between the Contractor and the Department which do not modify the Contract boilerplate language. *Attach as many additional pages as necessary.*

ARPA UNIQUE I.D. 10020.10145.750

Grant Description:

Line item 1599-2032 in Section 2A of Chapter 102 of the Acts of 2021 states, in part, “provided further, that not less than \$1,000,000.00 shall be expended to the Westmass Area Development Corporation for new water and sewer infrastructure for the Ludlow Mills redevelopment located within an environmental community. In satisfaction of this provision, the Department of Environmental Protection (“DEP”) hereby awards a grant of \$1,000,000.00 to the Westmass Area Development Corporation for costs associated with the development of the new infrastructure.

This project includes the construction of approximately 1400 linear feet of new water and sanitary sewer infrastructure through the central core of the mill complex, with connections to the historic stock houses and other mill buildings. This new internal system will be connected to the new public water and sewer lines that were recently constructed as part of a new road built to the south of the mill complex. This new system would entirely replace the century-old lines.

Replacing antiquated and deteriorated water and sewer lines is beneficial to both the environment and public health. Old water lines can contain lead and asbestos as well as other toxins that can contaminate the water supply both for public use through domestic taps and by leaking into the ground water. Sewer systems past their useful life are also environmental and public health hazards due to the potential for overflows which can contaminate both ground and surface water. Replacing the ancient water and sewer lines in the core of the mill complex will reduce or eliminate these concerns by providing new, environmentally- friendly construction materials and best practice construction standards.

Design, engineering and the preparation of construction documents for the new water and sewer system at the Ludlow Mills is underway and should be complete by summer, 2022. A general contractor will be hired over the summer and construction is expected to begin by fall 2022. Construction is expected to be complete by spring, 2023.

Grant Terms:

Payments from DEP to the Westmass Area Development Corporation shall be solely on a cost reimbursement basis for costs incurred between the official start date of the contract and June 30,2024.

The Town shall submit all invoices for grant cost reimbursement on or before 08/01/2024. Such invoices must be accompanied by sufficient supporting documentation, including: contractor invoices and receipts; municipal receipts; canceled municipal checks or other appropriate evidence of payment.

DEP does not guarantee reimbursement of any cost outside the approved scope of the grant.

ATTACHMENT B - BUDGET AND APPROVED EXPENDITURES

(The Department and Contractor may complete this format or attach an approved alternative Budget format or invoice.)

Items identified below which are not part of the Contract should be left blank.

Attach as many additional copies of this format as necessary, Maximum obligation should appear as last entry.

Cost Category/Description	Unit Rate (per unit, hour, day)	Number of Units	Other Fees or Charges (specify)	TOTAL
Westmass Area Development Corporation/ Water and sewer infrastructure/ Ludlow Mills	NA	NA	NA	\$1,000,000.00
SUBTOTAL (this page)				\$1,000,000.00
MAXIMUM OBLIGATION				\$1,000,000.00



99 High Street
Boston, MA 02110

Main: 617-330-2000
Fax: 617-330-2001

massdevelopment.com

VIA Electronic Mail [s.lacour@westmassdevelopment.com]

October 17, 2022

Sarah la Cour
Westmass Area Development Corporation
One Monarch Place, Suite 1350
Springfield, Massachusetts 01144

RE: Application: 00395

Dear Ms. la Cour:

Thank you for submitting this application to the FY2023 Community One Stop for Growth. The Executive Office of Housing and Economic Development (EOHED), Department of Housing and Community Development (DHCD), and Massachusetts Development Finance Agency (MassDevelopment) worked together to evaluate all eligible applications and recommended the most ready and highest-impact projects for a grant. This application from Westmass Area Development Corporation was reviewed by the program(s) that could best serve the project's funding needs.

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Mike Kennealy
*Secretary of Housing &
Economic Development*
Chairman

Dan Rivera
President and CEO

On behalf of Governor Charlie Baker, Lt. Governor Karyn Polito and the Chair of our Board of Directors, Secretary Mike Kennealy, I am pleased to inform you that a grant in the amount of \$500,000 from the Site Readiness Program has been approved to support your project.

The next step is to work with our staff to confirm the scope for your project and finalize a grant agreement. Please review the accompanying sample Grant Agreement carefully. The specifics of this document will be identified during the scoping process. Once agreed upon, Westmass Area Development Corporation and MassDevelopment will sign the agreement to effectuate the project scope, schedule, and budget. Please note, this grant is recoverable if the site, or any portion thereof, is sold, conveyed, gifted, demised, ground leased, otherwise transferred, or refinanced within thirty (30) years of the execution of the Agreement. Please see Section 2(f) of the Agreement for additional information.

If you have any questions do not hesitate to contact the Site Readiness Program Manager, Amanda Gregoire, at agregoire@massdevelopment.com or at (617) 947-6368.

Finally, please note that public announcement of this award is embargoed until the Administration has had the opportunity to formally announce it through a local event and/or media release. Please refrain from sharing or publicizing news about this award outside of your organization until it is officially announced.

Sincerely,

A handwritten signature in blue ink, appearing to read "D. Rivera".

Dan Rivera
President and CEO

ATTACHMENT B: FY23 Brownfield Cleanup Grant -Threshold Criteria Response

1. Applicant Eligibility

Westmass Area Development Corporation, (Westmass), the grant applicant, is a 501c(6) non-profit community development organization created by the Commonwealth of Massachusetts in 1960. Our mission is to promote, stimulate, develop, and advance the business prosperity and economic welfare of the western Massachusetts region and its citizens. As a non-profit economic development organization sanctioned by the Commonwealth, Westmass is eligible to receive EPA Brownfield Cleanup Grant Funding. (ATTACHMENT C)

2. Previously Awarded Cleanup Grants

The sites at the Ludlow Mills complex proposed for cleanup under this US EPA Brownfield Cleanup Grant application have not been the recipient of US EPA Cleanup Grant funds in the past. However, Westmass received four previous Brownfield Cleanup Grants for several other sites within the historic mill complex property that include mill buildings and associated infrastructure.

A detailed listing of sites included in previous grants is as follows:

- A. EPA FY12 Brownfields Cleanup grant funds were used to abate and remove hazardous materials, including asbestos, for the decommissioned central steam heating system at the mills specifically located in Mill buildings numbered 101-132 and the basement of Mill #8;
- B. EPA FY13 Brownfield Cleanup grant funds were used for the abatement and removal of hazardous materials, including asbestos, on two, multiple-unit Storehouse buildings numbered 286-291 & 292-296;
- C. EPA FY15 Brownfield Cleanup grant funds were used for the abatement and removal of hazardous materials, including asbestos, in two connecting structures between Mill #8 and Mill #10 and between Mill #10 and Mill #11.
- D. EPA FY21 Brownfields Cleanup grant funds are currently being used for the abatement of and removal of hazardous materials in the roofing and floor and ceiling tiles in Stockhouse numbers 158/258, 160/260, 162/262, 164/264, 165/265, 167/267, and Mill building #44.

3. Expenditure of Existing Multipurpose Grant Funds

Westmass does not currently have a Multipurpose Grant.

4. Site Ownership

The Ludlow Mills complex was purchased by Westmass from Ludlow Industrial Realities, Inc. on August 24, 2011. At that time, the property was registered land in the Massachusetts Land Court, Hampden County Registry of Deeds, document #189050 in certificate #34897. The property is no longer registered land but is under a deed recorded on May 9, 2012, in Book 19251 Page 44. This ownership is the same for all sites under this application.

5. Basic Site Information

- A. **Site 1: The 300 Series Warehouses (300s Warehouses)-** located in the central

portion of the mill complex fronting State Street and directly north of Mill #11 and east of Mill #10.

Site 2: Mill Buildings 46 & 58- located in the western portion of the mill complex fronting the newly constructed Riverside Drive, directly south of Mill #9.

B. Address: 100 State Street, Ludlow, MA 01056 (Hampden County)- for the entire mill complex.

C. Current Owner: Westmass Area Development Corporation.

6. Status and History of Contamination at the Site

A. Hazardous Substances: Both sites are impacted by Hazardous Substances.

B. Operational History and Current Use: The sites have been used for various manufacturing operations over the past 150 years to create textiles and jute. The historic mill buildings remaining on the property were part of the Ludlow Mills jute manufacturing company that operated on the premises from the late 19th century until the middle of the 20th century. The **300s Warehouses** were used to store the manufactured jute prior to being shipped off property and are vacant except for the first floor. **Mill Buildings 46 & 58** were used to house the locomotive engines and as a machine and maintenance shop supporting the historic rail system within the complex and are both vacant. Redevelopment of the mill complex is a top priority for Westmass and is one of the largest mill redevelopment projects in New England. The mill complex is currently utilized by a mix of small light industrial companies, storage warehouse operations and brewery operations that lease space from Westmass.

C. Known Environmental Concerns: Phase I and Phase II Environmental Site Assessments (ESA) were completed in 2009 and 2011 for the historic mill complex. The Phase II ESA identified 18 locations of Recognized Environmental Concerns (REC's) within the historic mill complex. While the majority of these REC's were cleaned up under previous US EPA grants and a Massachusetts Office of Energy and Environmental Affairs remediation grant, environmental issues remain in the sites that are the subject of this US EPA Cleanup Grant application.

Hazardous substances in the **300s Warehouse buildings** identified in a 2018 Assessment Report prepared by Nobis include:

- ACM in black number plate adhesive, 9"x9" red floor tile, black eggshell roof sealant, upper roof tar, parapet flashing and sealant, pipe insulation, lower roof tar, cement panelboard, white caulking on cement panel board, exterior door and window caulking, and exterior window glaze.
- Lead Based Paint (LBP) (i.e. lead at a concentration greater than 0.5% by weight) in/on green metal doors, yellow/green painted wood, white painted panelboard, and grey painted brick.
- PCBs in black floor sealant and white caulk on exterior cement board detected above the TSCA 1.0 ppm cleanup standard for "high occupancy areas" in 5 of the 15 samples submitted for analysis.
- Universal wastes that include fluorescent light tubes, fluorescent light ballasts, lead acid batteries, metal halide/HID light bulbs, mercury switches, Freon containing air conditioning units, hydraulic doorstops, suspect PCB-containing pad-mounted transformers fire extinguishers, and various containerized waste.

Hazardous substances in **Mill Building 46** identified in the 2018 Nobis Assessment Report include:

- ACM in 4,500 Square Feet of roofing materials

Hazardous substances in **Mill Buildings 46 & 58** identified in a September 2022 Assessment Report, prepared by O'Reilly, Talbot & Odun Engineering include:

- ACM in exterior window glazing and floor tiles.
- LBP in the interior of both buildings.
- Universal wastes including presumed PCB-containing light fixtures and ballasts and 26, 55-gallon drums, most of which contain solid waste.

D. Extent of Contamination: The ACM and other hazardous materials that are the subject of the sites in this EPA Brownfield Cleanup Grant application are within the roofing materials, floor and ceiling tiles and window caulking.

- The **300s Warehouses** – ACM was detected in 41,500 SF of roofing and wood deck; in the caulk and glazing of 425 windows and 45 doors; and 2,000 Linear Feet of pipe insulation. In addition, ACM and other hazardous materials are contained in 1,500 SF of floor tiles and 600 SF of concrete/cement products.
- **Mill Buildings 46 & 58** - ACM was detected in 4,500 SF of roofing materials on Building 46 and in the exterior glazing of all 10 windows, 30 SF of floor tiles and in 50 SF of corrugated siding and was also detected in the exterior glazing of 20 windows in Building 58. In addition, lead was found in the interior paint of both buildings.

7. Brownfields Site Definition

Westmass affirms the following:

- A. The sites are not listed or proposed for listing on the National Priorities List;
- B. The sites are not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA;
- C. The sites are not subject to the jurisdiction, custody, or control of the United States government.

8. Environmental Assessment Required for Cleanup Grant Applications

A Phase II ESA, dated June 2011, was conducted by Advanced Environmental Solutions, Inc. (AES) for US EPA Region 1. The ESA involved on-site and records investigations as well as soil and ground water sampling and analytical laboratory testing. A Remediation Plan (excluding asbestos contamination) meeting Massachusetts Contingency Plan cleanup requirements was prepared by O'Reilly, Talbot and Okun Associates, Inc. (OTO) for the REC's identified in the Phase II report.

In June 2018, Nobis Engineering, Inc. prepared a Targeted Brownfields Assessment Report (EPA Task Order No. 0108-SI-BZ- 0010) to assess hazardous and/or regulated materials that would require abatement or special handling prior to building renovation or demolition. The **300s Warehouses** were included in the list of buildings with ACM and other hazardous materials and **Mill Buildings 46 & 58** were included in the roofing assessments. In addition, in 2021, OTO provided an updated opinion of costs for the abatement of the **300s Warehouses**

which closely correlates with the estimates provided in the Nobis Report.

In September 2022, O'Reilly, Talbot & Okun Engineering prepared an Asbestos and Hazardous Materials Assessment Report for **Mill Buildings 46 & 58** to assess hazardous and/or regulated materials that would require abatement or special handling prior to adaptive reuse.

9. Site Characterization

C. The sites are not eligible to be enrolled in the Massachusetts Contingency Plan Program (MA VCP) because they are contaminated with hazardous building materials which is excluded from program eligibility.

- i. A letter from the Massachusetts Department of Environmental Protection (MA DEP) dated November 7, 2022 confirms that the sites are not eligible for the State's brownfield enrollment program. (ATTACHMENT D)
- ii. O'Reilly, Talbot & Okun, Westmass' Environmental Professional, has certified that there is a sufficient level of site characterization from the assessments that have been performed to date for the remediation work to begin.

10. Enforcement or Other Actions

There are no known enforcement actions associated with the **300s Warehouses** or **Mill Buildings 46 & 58**.

11. Sites Requiring a Property-Specific Determination

No property specific determination is required. Westmass affirms that these are not:

- Listed or proposed to be listed as a property subject to CERCLA;
- Subject to administrative or judicial orders or consent decrees issued by the US or Massachusetts under RCRA, FWPCA, TSCA or SDWA;
- Subject to RCRA corrective actions;
- Subject to RCRA closure or to closure requirements specified in a closure plan or permit;
- Subject to PCBs that are subject to TSCA remediation; or
- Receiving clean up funding from the LUST program.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

A. Property Ownership Eligibility: Hazardous Substance Sites

iii. Landowner Protections from CERCLA Liability

Westmass purchased the property after the completion of a AAI-ASTM Phase I ESA meeting All Appropriate Inquiry Standards and a ASTM Phase II ESA. Westmass did not contribute to and is not liable for any contamination on either of the project sites.

1) Bona Fide Prospective Purchaser Liability Protection

a. Information on the Property Acquisition

Westmass acquired the Ludlow Mills property, including the two grant project

sites, from a private entity known as the Ludlow Industrial Realities, Inc. on August 24, 2011. The premises were registered land in the Massachusetts Land Court. The sale was negotiated between the private parties which lead to Westmass acquiring fee simple title to the premises and being sole owner through a Massachusetts quitclaim deed at closing. Westmass and the former owner, Ludlow Realities, Inc. has had no familial, contractual, corporate, or financial relationships prior to this acquisition. As part of Westmass' acquisition of the premises, Ludlow Realities, Inc. has provided Westmass with a mortgage on the property.

b. Pre-Purchase Inquiry

- AAI ASTM Phase I ESA, completed in August of 2011, was conducted by Advanced Environmental Solutions, Inc. (AES). This document was prepared for Westmass. That document updates an AAI ASTM Phase I ESA previously prepared for the US Environmental Protection Agency (US EPA) dated March 2009. In addition, AES prepared a Phase II ESA in June 2011. The Phase II ESA was prepared for US EPA Region 1 as well.
- The Phase I ESA activities were conducted in accordance with Code of Federal Regulation (40 CFR) part 312 for All Appropriate Inquires (AAI) and ASTM Standard Practice E1527-05 (“Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process”).
- The Phase II ESA activities were conducted in accordance with ASTM Standard Practice E1903-97 (“*Standard Guide for Environmental Site Assessments: Phase II Environmental Site Assessment Process*”).
- The Phase II completed in June 2011 as well as the Initial Phase I issued dated March 2009 was prepared for the US EPA Region 1 as part of an EPA Targeted Brownfield Technical Assessment.
- US EPA Region 1 provided significant technical assistance in support of Westmass' efforts. Information and findings contained in these technical reports greatly assisted the evaluation / decision process by Westmass to acquire the property and undertake the adaptive use and redevelopment of this regionally significant Brownfields site.
- Advanced Environmental Solutions, Inc. (AES) performed the Phase I and Phase II ESA's. AES is a qualified Environmental Engineering firm selected by US EPA Region 1. AES conducted the ESA's and prepared reports in accordance with the Massachusetts Contingency Plan and EPA requirements.
- The Original Phase I Environmental Site Assessment (ESA) dated March 2009 was updated in August 2011. This update occurred within 180 days prior to Westmass' acquisition of the property to qualify for the bona fide prospective purchaser provision.

c. Timing and/or Contribution toward Hazardous Substances Disposal

Westmass did not dispose of hazardous substances at the sites before or after it acquired the property. Westmass purchased the property after a Phase I ESA meeting All Appropriate Inquiry Standards and a Phase II ESA were completed

under the US Environmental Protection Agency (EPA) Targeted Brownfield Assessment Program (Funded by EPA Region 1). Westmass did not contribute to and is not liable for any contamination on either of these sites.

d. Post-Acquisition Uses

Westmass acquired the Ludlow Mills on August 24, 2011. At the time of acquisition, there were 37 tenants occupying approximately 500,000 square feet of building area. The uses ranged from a cellular tower, to unheated storage, to machine shops, wood and metal working and distribution.

The 20 tenants and associated uses that are currently leasing space at Ludlow Mills from Westmass as of the date of this application, November, 2022 are listed below:

Ludlow Mills - Businesses Active at the Mills, November 1, 2022

Company	Business
America’s Box Choice	Packaging Materials
The Diesel Works	Metal Arts and Makerspace
Dustbusters	Duct Cleaning Service
Elite Metal Fabricators	Metal Fabrication
Emco Tool	Tool Manufacturing
Fernbro Enterprises	Restaurant Parking and Storage
Green Earth Roofing Solutions	Solar Installation
Hampden County Sheriff	Office/Storage
Heron Automation	Tool Manufacturing
Homeward Vets	Veterans Support Services
Iron Duke Brewing	Microbrewery
Molta Florist	Florist
New England Battery	Battery Sales and Servicing
Outlaw Logistics*	Logistics
PAW	Custom Woodworking
Potential Energy	Energy Efficiency
PWE Fabrications	Precision Metal
Roy Manufacturing	Precision Manufacturing
Site Acquisitions, Inc.	Cellular Tower
Winn Residential	Storage

*Outlaw Logistics currently leases the first floor of the 300s Warehouses. Mill buildings 46/58 are vacant.

e. Continuing Obligations

The specific and appropriate care that Westmass has exercised related to hazardous substances at Ludlow Mills includes:

- With funds from a FY21 EPA Brownfields Cleanup grant, Westmass is currently involved in the abatement and removal of ACM in roofing materials, floor and ceiling tiles and window caulking in multiple

stockhouses and the former carpentry building (#44).

- With Funds from the FY12 EPA Brownfield Cleanup grant, Westmass retained the services of Cardno/ATC, Inc., to conduct ACM assessments, assist Westmass with the public bid process as well as the oversight of the contracted Abatement work including Air Quality Monitoring.
- With funds from the EPA FY12 grant Westmass contracted with Abide, Inc for the abatement of the ACM for the decommissioned and demolition of the central steam heating system.
- With funds from the EPA FY13 grants, Westmass contracted with Tighe & Bond, Consultant Engineers for the Abatement and Demolition work on the Two Storehouse Buildings 286-291 & 292-296.
- Westmass retained the services of O'Reilly, Talbot, and Okun, Environmental Engineers, under the Mass EEOEA grant to advise the corporation on matters relating to hazardous substances at Ludlow Mills. Westmass has developed and undertaken a detailed Environmental Remediation Plan that has successfully accomplished the following:
 - Formally reported known releases of hazardous materials to the Massachusetts Department of Environmental Protection, (MA DEP).
 - Characterized the known releases for the purpose of developing a detailed response to the release and, in cooperation with MA DEP, developed extensive Environmental Remediation Plans.
 - Carrying out mitigation measures for all releases of hazardous materials.
 - Specific and appropriate care that Westmass has exercised to prevent any threatened future releases and or prevent or limit exposure to any previously released hazardous substance includes:
 - Westmass has written new language for inclusion in all lease documents that notifies tenants of their responsibilities with respect to the use of hazardous materials. Westmass will inspect leased premises on a regular and ongoing basis to ensure that there are no new releases or potential releases of hazardous materials.
 - Westmass entered into a consent agreement with the Massachusetts Department of Environmental Protection which required the conversion of the existing oil-fired heating system to natural gas and required the removal of existing fuel oil storage tanks and piping which was completed in April 2012.

Westmass is committed to:

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

13. Cleanup Authority and Oversight Structure

A. Westmass will be responsible for oversight of the Hazardous Substance Removal

and Remediation under this EPA FY23 Grant in collaboration with a Qualified Environmental Professional (QEP). Westmass will solicit and select a Qualified Environmental Professional (QEP) for Project Planning and Oversight through a public bid process which, while utilizing Federal Funding, will follow set procurement guidelines of existing Mass General Law regarding procurement (MGL 30 B) which is consistent with 40 CFR 31.36. as well as 2 CFR 200.317-200-327. The QEP will assist Westmass with the selection of a Licensed Abatement/Demolition Contactor / Inspection / Testing Firm as well as project management and reporting. Selections of these firms for the cleanup project will be based on both qualifications and costs.

- B. Because Westmass is the property owner of the 133-acre Ludlow Mills complex that includes the areas adjacent to these two sites, it does not anticipate needing access to other adjacent properties to conduct the cleanup activity for these sites.

14. Community Notification

- A. A presentation was prepared by Westmass personnel which addressed the Draft Analysis of Brownfield Cleanup Alternatives (ABCAs) (ATTACHMENTS E & F) prepared for each site and summarized the sites and contamination issues, cleanup standards, proposed cleanup proposal, and applicable laws / regulations. These materials were also made available to the public for review and comments by request.
- B. Westmass Area Development Corporation published a legal notice in the Ludlow Register appearing in the newspaper's October 19th and October 26th, 2022 editions announcing that a public meeting was to be held. (ATTACHMENT G)
- C. The public meeting was held remotely on November 1, 2022, via Zoom and created an opportunity for Westmass to present the proposed cleanup and solicit public review and comments. No one from the public attended the meeting and no questions or requests for information were received prior to or at the meeting. (ATTACHMENT G)

15. Contractors and Names Subrecipients

- A. Contractors: Westmass has not procured any contractors.
- B. Subrecipients: Westmass has not identified any specific subrecipients to conduct work related to this application.



U. S. TREASURY DEPARTMENT
INTERNAL REVENUE SERVICE
WASHINGTON 25, D. C.

IN REPLY REFER TO
T:R:EO: 5
OFC

NOV 20 1961

Springfield Area Development Corporation
134 Chestnut Street
Springfield, Massachusetts

I. R. CODE
SECTION 501(c) (6)
ADDRESS INQUIRIES & FILE RETURNS WITH DISTRICT DIRECTOR OF INTERNAL REVENUE
Boston, Massachusetts
ACCOUNTING PERIOD ENDING March 31

Gentlemen:

Based upon the evidence submitted, it is held that you are exempt from Federal income tax under the provisions of the Internal Revenue Code section indicated above. Any questions concerning taxes levied under other subtitles of the Code should be submitted to your District Director.

You are not required to file Federal income tax returns so long as you retain an exempt status, unless you are subject to the tax on unrelated business income imposed by section 511 of the Code and are required to file Form 990-T for the purpose of reporting unrelated business taxable income. Any changes in your character, purposes or method of operation should be reported immediately to your District Director for consideration of their effect upon your exempt status. You should also report any change in your name or address. You are required to file an information return, Form 990, annually, after the close of your annual accounting period, indicated above.

Your District Director is being advised of this action.

This ruling is made under section 501(c)(6), rather than section 501(c)(4) which is considered less applicable.

Very truly yours,

J. F. Worley
Chief, Exempt Organizations Branch



The Commonwealth of Massachusetts
Department of the State Secretary
State House, Boston 02133

MICHAEL JOSEPH CONNOLLY
SECRETARY OF STATE

JUNE 11, 1981

TO WHOM IT MAY CONCERN:

I hereby certify that according to records in this office Springfield Area Development Corporation was incorporated by the provisions of Chapter 192 of the Acts of 1960 (Massachusetts Laws).

I also certify that the following Act relating to said corporation appears of record here:- Chapter 246 of the Acts of 1963.

I further certify that Articles of Amendment were filed in this office April 25, 1966.

I also certify that the name of the corporation was changed to Westmass Area Development Corporation by Articles of Amendment filed here June 5, 1981 (which Amendment includes an increase in the number of members of the Board of Directors to not more than 27 members, and that the duration of the corporation be increased to one hundred years.)

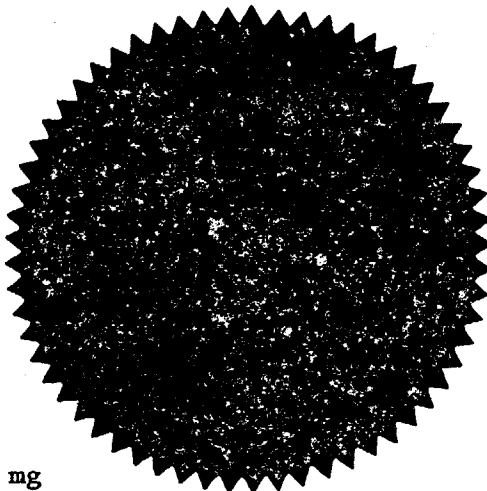
I further certify that no other Amendments or Acts relating to said corporation appear of record in this office and that said corporation still has legal existence.

IN TESTIMONY of which, I have hereunto

affixed the Great Seal of
the Commonwealth on the
date first above written.

A handwritten signature in cursive script that reads "Michael Joseph Connolly".

Secretary of State



mg

ATTACHMENT D: Letter from MA DEP



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

Beth A. Card
Secretary

Martin Suuberg
Commissioner

November 7, 2022

Via Email

Attn: Jeffrey Daley, President / CEO
Westmass Area Development Corporation
One Monarch Place, Suite 1350
Springfield, MA 01144

RE: STATE LETTER OF ACKNOWLEDGMENT
Westmass Area Development Corporation – Brownfields Cleanup Grant
Ludlow Mills, 100 State Street, Ludlow [unenrolled]

Dear Mr. Daley:

I am writing to support the application submitted by the Westmass Area Development Corporation under the Fiscal Year 2023 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. We understand that the Westmass Area Development Corporation is proposing to undertake cleanup activities including the abatement and remediation of hazardous building materials at the subject property, specifically in the buildings identified as the 300's Warehouse and Mill Buildings 46 & 58.

Based on information provided by the Westmass Area Development Corporation, the Development Corporation took ownership of the property in 2012, and the buildings and portion of property targeted for this Cleanup grant are not enrolled in the Massachusetts voluntary cleanup program. According to the Westmass Area Development Corporation, the level of assessment of hazardous building materials conducted to date is sufficient to design and initiate the proposed cleanup activities.

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

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

Sincerely,

David Foss, CPG, LSP
Statewide Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Dorrie Paar, US EPA
Sarah la Cour, Westmass Area Development Corporation
Caprice Shaw, MassDEP Western Regional Office

This information is available in alternate format. Call the MassDEP Diversity Office at 617-556-1139. TTY# MassRelay Service 1-800-439-2370

MassDEP Website: www.mass.gov/dep

Printed on Recycled Paper

ATTACHMENT E: Analysis of Brownfield Cleanup Alternatives (ABCA)
- Preliminary Evaluation Asbestos Removal and Remediation

PROJECT: The 300 Series Warehouses - Roof, Interior Tiles and Window Glazing
Ludlow Mills Complex, 100 State Street, Ludlow, MA 01056

This Analysis of Brownfield's Cleanup Alternatives (ABCA) is intended to provide a cleanup project summary outline in support of a pending Grant Application to the FY 2023 US EPA Brownfield Cleanup program.

Release Tracking Number

The Massachusetts Department of Environmental Protection (MADEP) does not assign specific tracking numbers to asbestos abatement projects such as the one proposed for Ludlow Mills. Release Tracking Numbers (RTNs) however were issued related to the AAI- ASTM Phase I and Phase II Environmental Site Assessment Reports and several other sites at Ludlow Mills where contamination has been cleaned up with State Site Remediation Grant funds. That remediation work was completed in June of 2014.

Prepared by: Westmass Area Development Corporation, Owner of the Property
One Monarch Place, Suite 1350
Springfield, MA 01144
www.westmassdevelopment.com

I. INTRODUCTION & BACKGROUND

a. Site Location

The project is located at 100 State Street in Ludlow, Massachusetts within the historic Ludlow Mills Complex and specifically involves one large mill building and two attached connectors known as the **300 Series Warehouses** (300s Warehouses) located in the central portion of the mill complex.

b. Previous Site Uses and any Previous Site Cleanup / Remediation

Previous Site Use(s):

The project area on the Chicopee River has been utilized by industry since the late eighteenth century. Between 1812 and 1844 the site supported operation of textile and cotton mills. Gun barrels were manufactured at the site of the current Mill No. 8 building from 1840 to 1846. Between 1846 and 1848 the building was used for the manufacturing of textile machinery. Starting in 1850, Jute products were produced on the property and the Ludlow Manufacturing Company was established in 1856, later named the Ludlow Mills Company.

Jute manufacturing remained the primary activity on the site into the mid-20th century. A majority of the historic mill buildings, including the **300s Warehouses**, remain from the early 20th century having been built starting in 1900 with significant mill expansion over time. The historic mill complex is approximately 52 acres in size and contains approximately 35 structures with a total floor space of approximately 1,200,000 square feet. Since the 1960's the complex has been a multi-tenant industrial park and contains a large number of commercial and industrial operations. Of the site's extant mill buildings, five are

large multi-story structures (Mill #s 8, 9, 10 and 11, and the **300s Warehouse** buildings along State Street). The additional buildings consist of a series of small (approximately 6,000-12,000 SF), single story, brick block stockhouses located along the Chicopee River in the south and eastern portion part of the site; the former locomotive building and associated maintenance building (Buildings 46/58) and the former carpentry building (#44). The Ludlow Mills complex is included within the Ludlow Village National Historic District (LUD.F) and listed in the State and National Registers of Historic Places.

Previous Site Clean-up and Remediation:

Under the previous site ownership of Ludlow Industrial Realty Inc., a Phase 1 Environmental Site Assessment (ESA) was prepared in March 2009 by Advanced Environmental Solutions, Inc. (AES) for the US Environmental Protection Agency (EPA). That Phase 1 ESA was updated by AES in August 2011. In addition, AES prepared a Phase II ESA for the property between September 2010 and June 2011.

The Phase II Environmental Site Assessment (ESA), performed in 2010 and 2011, identified several Recognized Environmental Conditions (RECs). Subsequent environmental assessment activities including limited testing were conducted. The results were compiled in the Phase II ESA dated August 2011, in which 18 RECs existed. These RECs related to industrial use of the property and other subsequent tenants, the illegal disposal of materials, and the use of an up-gradient property as a gasoline station. The report indicated recommendations for additional assessment.

Known releases at the Ludlow Mills property identified in the Phase I and Phase II ESAs include releases of polychlorinated biphenyl (PCB) from transformers, #6 fuel oil from the use and storage of heating oil, and diesel fuel from a delivery truck. Releases of PCBs were concentrated around electrical substations to the north of Mill building 10 and on the bank of the Chicopee River. Contaminated soil that was accessible at the time was removed from these areas, however, residual contamination remained underneath the substations and an Activity and Use Limitation (AUL) is in place in order to limit exposure should the contaminated soil be disturbed. The AUL was terminated in 2014. Historically, several releases of fuel oil were reported near stockhouse #205, which served as the Boiler Building, as a result of filling operations of the two 15,000-gallon fuel oil underground storage tanks (USTs) used for fuel oil storage. Soil in the immediate area around the tanks was excavated and impacted water in storm drains was cleaned up. The two USTs were removed in April 2012.

Westmass and its consultant at that time, O'Reilly, Talbot and Okun Associates, Inc. (OTO), developed a Remediation Plan, (excluding asbestos) for implementation. The estimated cost of implementation of the Remediation Plan for the Recognized Environmental Concerns identified in the Phase I and II reports was estimated to be \$1,500,000. Funding was secured from the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA) through a \$1,500,000 grant awarded to Westmass for site remediation of the Ludlow Mills property. Westmass actively implemented the Remediation Plan and finalized this remediation work in June of 2014.

c. Site Assessment Findings – Hazardous Materials

In June 2018, a Draft Targeted Brownfields Assessment Report was prepared by Nobis Engineering for EPA Region 1 in order to determine other sources of asbestos contamination. Westmass analyzed the Report for the **300s Warehouses** and found confirmation of ACM in roofing materials, windows, door caulk and other adhesives and insulation.

The **300s Warehouses** are a series of buildings including a 226,000 square-foot, 8-story warehouse building with a one-story portion on the south side, abutting State Street. The Warehouses were constructed between 1910 and 1930 and are concrete and brick construction with a flat engineered roof (rubber roof on wood/concrete decking). The 8-story building foundation is slab on grade with no basement. Interior construction is brick and concrete. Ceiling height is low (the 8-stories are condensed into what would be considered a 5-story building) and closely-spaced support columns break up the open space throughout. The building interior is unfinished aside from a small office area and associated bathrooms on the first floor. These spaces are finished with sheetrock and fiberboard walls, carpet, and vinyl floors. Currently the building has one tenant on the first floor.

d. Project Goal

The Ludlow Mills Preservation and Redevelopment Project continues to reverse years of neglect at the mill complex and will continue to spur local and regional economic activity and job creation. By remediating numerous environmental hazards & asbestos contamination, the project will protect sensitive environmental resources and provide the community with public access to the Chicopee River for passive recreation.

Redevelopment and revitalization of the Ludlow Mills complex is a regionally significant economic development project and has been cited within the 2019 Annual Comprehensive Economic Development Strategy (CEDS) report of the Pioneer Valley Plan for Progress, as a regional “High Priority Project”. The intent is to serve areas meeting US Economic Development Administration Economic Distress Criteria according to the Pioneer Valley Planning Commission.

Westmass plans to redevelop the complex with green technologies including solar and low impact development storm water (LID) systems. The overall project embraces sustainable development principles and seeks to meet USGBC LEED quality standards for new construction at the site. The project's primary focus will be on commercial and industrial development but with a number of residential housing units created in the larger mill buildings where possible.

Westmass has been successful in obtaining assistance and cooperation from several sources at the Federal, State and Local levels as well as private utilities for redevelopment efforts. The direct involvement and support from the start of this regionally significant project by federal and state officials, numerous elected officials and the community of Ludlow have been instrumental. Westmass is committed to seeing that the Ludlow Mills once again becomes a major contributor to the economic prosperity of the region.

To date, the Ludlow Mills Preservation and Redevelopment Project has achieved

numerous milestones highlighted below:

- In 2022, Westmass was awarded two grants from MassDevelopment through the Massachusetts Community One Stop for Growth Program. \$500,000 was awarded for Electrical upgrades and \$500,000 was awarded for new roofs.
- In 2021, Westmass received two grants from MassDevelopment through the Massachusetts Community One Stop for Growth Program. \$650,000 was received from the Site Readiness Program to fund the design and engineering of infrastructure improvements within the mill complex and \$250,000 was received from the Underutilized Properties Program to fund capital improvements on several stockhouse buildings.
- In 2021, Westmass also received an EPA Brownfields Cleanup Grant to remediate ACM in the roofing of several historic stockhouses as well as the former Carpentry Building.
- Winn Development is currently proposing to adaptively reuse Mill #8 (the iconic clocktower building) as residential housing using historic tax credits. This represents an approximate \$58 million investment.
- With a \$7 million investment, the Town of Ludlow is completed a new Ludlow Senior Center State Street on mill land formerly owned by Westmass on State Street.
- In 2019, the Town of Ludlow, in partnership with Westmass, received \$6.6 million in grant funds from the MassWorks Infrastructure Program and the US Department of Commerce Economic Development Administration to construct a 4,200 linear foot roadway and associated infrastructure within the mill complex to advance revitalization efforts.
- Westmass has received \$2 million of private financing for project development from a consortium of regional lenders.
- Westmass has received approval of the delineation of wetlands and riverfront area under the Massachusetts Wetlands Protection Act from the Ludlow Conservation Commission.
- Westmass secured State permitting from MEPA for the Final Environmental Impact Report in September 2017 with the issuance of a Certificate of the Secretary of Energy and Environmental Affairs.
- With input from Westmass, the Town of Ludlow voted to change the zoning for the site from Industrial A to Mill Redevelopment District, to allow mixed use development. In addition, the Town created a Smart Growth Overlay District, Ludlow Mills Sub-District.
- The Town of Ludlow received \$3.7 million in funding for the reconstruction of State Street and First Avenue, replacement of water lines, and installation of streetscape improvements and a sewer pump station.
- In 2017 Winn Development, utilizing Historic Tax Credits as part of the financing package, completed a \$24 million, adaptive reuse of Mill #10 to provide 55 units of Senior Independent Living.
- The \$27 Million dollar HealthSouth Rehabilitation Hospital Project (Private) was completed in November 2013 and achieved LEED HC Gold certification.
- Westmass received a \$1.5 million grant from the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA) for environmental remediation work (excluding asbestos) at Ludlow Mills.
- Westmass was awarded a total of \$400,000 with two separate FY13 US EPA Brownfield Cleanup Grants for the Phase II portion of the Ludlow Mills

- Asbestos Abatement and Removal involving ACM abatement and demolition of Storehouse building 286-291 and Storehouse building 292-296.
- In 2012, Columbia Gas invested in excess of \$600,000 to complete construction of a new intermediate pressure natural gas line along the length of State Street.
 - Westmass was awarded a \$200,000 FY12 US EPA Brownfield Cleanup Grant for the Phase I portion of the Ludlow Mills Asbestos Abatement and Removal involving ACM Pipe Wrap on existing abandoned steam piping in mill buildings #s8 and 11 and the #300s buildings.
 - Westmass Area Development Corporation purchased the property on August 24, 2011.
 - Between 2009 and 2011, the Project received \$231,000 in funding from the U.S. Environmental Protection Agency for environmental site assessment.

II. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

Cleanup Oversight Responsibility – Westmass Area Development Corporation will be responsible for oversight of the Asbestos Removal and Remediation. In a public bid process following set procurement guidelines, Westmass will solicit and select an Environmental Engineer for project planning, oversight and assistance with the selection of a Licensed Abatement Contactor with a Licensed Inspection / Testing Firm. Selections will be based both on qualifications and costs.

a. **Cleanup Standards for Major Contaminants**

Laws and regulations are applicable to the removal and disposal of Asbestos materials as Hazardous Waste. These standards are in place to prevent it from becoming airborne and harmful to workers or the public. Regulations include Federal laws and worker protection standards from exposures, address transportation of asbestos waste, and limit air pollutants under National Emissions Standards for Hazardous Air Pollutants.

Massachusetts Laws and Regulations require notification and work practices to avoid fiber release for asbestos handling, removal, storage, transport, and disposal. Regulation also requires inspection of demolition/renovation and manufacturing operations and special waste landfilling of asbestos and asbestos-containing material.

b. **Laws and Regulations Applicable to the Cleanup**

Federal Regulations

- Brownfields Revitalization Act
- Davis / Bacon Act
- OSHA: Regulations: 29 CFR Parts 1910 & 1926.
- DOT: Title 49, section 173.1090.
- EPA: (NESHAP): 40 CFR Part 61 Subpart M.
- Emergency Response Act (AHERA) 40 CFR Part 763
- Toxic Substances Control Act (TSCA).

Massachusetts Regulations

- 310 CMR 7.00: AIR POLLUTION CONTROL specifically section 7.09: Dust, Odor, Construction and Demolition,
- Regulations: 310 CMR 4.00 (Air quality notification approval timelines and

fees), 7.00, 7.09(5), 7.15 (Air quality asbestos regulation) and 310 CMR 19.061 (disposal requirements) and 310 CMR 16.00 (landfill siting; asphalt-brick-concrete recycling).

- Massachusetts Department of Environmental Protection and its Bureau of Waste Site Cleanup (DEP-BWSC), regulates cleanup of hazardous materials. Material containing asbestos must be reported if released to the environment or if it poses a threat of release, Regulations: 310 CMR 40.0000.
- The Massachusetts Department of Public Health's (DPH) State Sanitary code requires that property owners must maintain asbestos in good repair. Any repair and removal of asbestos must be done in accordance with all DEP and DPH asbestos regulations, Regulations: 105 CMR 410.353 (Sanitary Code) 105 CMR 670 (Community Right-to-Know).
- Mass Department of Occupational Safety (DOS) prescribes training, certification and/or licensing requirements for persons and firms engaged in asbestos work, inspections, monitoring, laboratories and training providers. DOS also prescribes project notification and work practice requirements for asbestos work.

Local Regulation and Project Coordination

Westmass, along with its Licensed Abatement Contactor and Licensed Inspection / Testing Firm, will coordinate with the Ludlow Building Commissioner and the Ludlow Board of Health as applicable for this cleanup. Westmass, and its contractors, will obtain required sign offs and will take all cautions practicable to prevent any condition that may affect the health or safety of the public or occupants of Ludlow Mills.

Other applicable regulations include Federal, state, and local laws regarding procurement of contractors conducting the cleanup will be followed. In addition, all appropriate permits will be acquired prior to the work commencing such as Dig Safe, Transport and other Asbestos MADEP Asbestos Abatement Notification filings.

III. EVALUATION OF CLEANUP ALTERNATIVES

a. Cleanup Alternatives Considered

To address contamination at the Site, three different alternatives were considered as follows:

- Alternative #1: No Action,
- Alternative #2: Repair, Encapsulation and Ongoing Maintenance, and
- Alternative #3: Removal and Offsite Disposal.

b. Effectiveness, Implementability & Cost of Cleanup Alternatives

Effectiveness

Alternative #1: No Action: This Alternative is not an effective option in controlling or preventing the exposure of persons or the environment to contamination at the site. No Action is included in this evaluation in order to compare and contrast any significant reduction in site risk to other remedial actions to.

The No Action Alternative would severely restrict the ability of Westmass to move forward with the adaptive reuse of some mill buildings as well the demolition of buildings impeding other significant redevelopment projects. As outlined previously there has been

significant investment to date from both public and private funding for the Ludlow Mills project which would be significantly impacted and stranded.

The No Action Alternative does not meet the goal of the redevelopment of the Ludlow Mills because adaptive reuse of the buildings or removal of unusable or unstable buildings cannot occur unless the asbestos is removed.

Alternative #2: Repair, Encapsulation, Operation and Maintenance (O&M): Repair and encapsulation could be an effective way to prevent persons from coming into direct contact with asbestos in the Mill Area if the encapsulation is maintained. However, encapsulation is not an effective means to control other exposures, such as direct contact risks for occupants of the site over time as well as workers performing the adaptive reuse work planned to revitalize Ludlow Mills. Repair and encapsulation limits the reuse options to those without occupied space such as storage and is not a viable option when demolition of the building is necessary.

Asbestos encapsulation is the process of using a product that either coats or creates a membrane to prevent the asbestos fibers from getting into the air or penetrates the asbestos containing material binding the components together. Asbestos encapsulation can also be done by sealing off any areas containing asbestos with an air proof barrier. In some cases asbestos encapsulation can be used in order to avoid the high cost of asbestos removal. Asbestos encapsulation is a cheaper option, and is safe as long as the area does not need to be disturbed.

During repair and encapsulation the Abatement contractor will isolate the portion of the building where repair and encapsulation is taking place most likely with sheets of plastic, and provide self-contained showers and throwaway protective suits to prevent contamination of the workers. All tools and materials used must be sufficiently cleaned and all waste containing asbestos generated by the project such the protective suits will be bagged in plastic, and properly disposed of.

The Environmental Protection Agency does not recommend asbestos encapsulation where the asbestos is more than one inch thick, water damaged, has poor cohesive strength or where the asbestos is accessible to the people who are using the building. In these instances it is better to remove the asbestos to minimize the risk to the occupants of the building.

Alternative #2 would severely restrict the ability of Westmass to move forward with the redevelopment of Ludlow Mills and specifically the demolition of the 300 Series Warehouse.

Alternative #3: Removal and Offsite Disposal: Removal and offsite disposal is the most effective way to eliminate risk to humans and the environment at the site, since ACM contamination will be removed and the exposure pathways will no longer exist. All asbestos-containing materials are totally removed from the roofs and interior spaces of the Mill buildings in question which will facilitate redevelopment activities. No further monitoring or maintenance of the asbestos-containing materials is needed.

The Abatement contractor will isolate and remove the portion of the buildings where the

asbestos removal is taking place with sheets of plastic and provide self-contained showers and throwaway protective suits to prevent contamination of the workers. All asbestos-containing materials will be bagged in plastic, and proper disposal arranged.

An important aspect of asbestos-removal is air quality monitoring by an inspector who will be at the site throughout the abatement work. The selected firm monitoring the project will be completely independent from the contractor performing the work to provide oversight. This independent firm will set up an air monitoring station to ensure that the concentrations of asbestos fibers both inside and outside the work area do not increase beyond standards required by MA DEP.

The Environmental Protection Agency recommends asbestos removal as the best method to minimize the risk to workers or the occupants of the building the public and visitors to the Ludlow Mills complex.

Implementability

Alternative #1: No Action: No Action is a simple alternative to implement since no actions need to be undertaken by the owner.

Alternative #2: Repair, Encapsulation, Operation and Maintenance (O&M): These actions require significant effort and expense to implement given the extent of asbestos contamination on the roof and in the windows on the **300s Warehouses**. Repair and encapsulation will require access to all outside and confined spaces that were identified to have asbestos contamination. Testing will be required when the work is being performed. In addition, this alternative may require the long-term installation and monitoring of air quality monitoring stations. Because the site is active with diverse tenants and leasing space and adaptive reuse being planned for the structures throughout the mills, ongoing air sampling equipment, monitoring and maintenance of the encapsulation would require periodic testing and reporting. Because of these reasons this alternative is considered very difficult to implement over the long term.

Alternative #3: Removal and Offsite Disposal: Removal and offsite disposal is moderately difficult to implement. Coordination and testing will be required during cleanup activities (e.g., site control and air handling enclosures, dust suppression and monitoring). A minor increase in traffic will result from additional trucks transporting materials offsite. Testing will be required when the abatement work is being performed however long-term monitoring and maintenance will not be required after offsite disposal. By taking advantage of the asbestos removal, alternative the hazardous materials can be removed intact, placed in bags, sealed, transported and disposed of offsite. An opportunity currently exists within the 300 Series Warehouse as the building is vacant except for the first floor so remediation work can be performed efficiently.

One significant advantage of the Ludlow Mills Asbestos Removal and Offsite Disposal Alternative for the **300s Warehouses** is that they are essentially a separate structure that can be abated and demolished in a controlled operation. The result of the cleanup and potential demolition would be advantageous to the overall Ludlow Mills Preservation and Redevelopment project and consistent with the approved Ludlow Mills Master Plan, approved Local Comprehensive Plan and Massachusetts Environmental Policy Act (MEPA) permitting.

Cost

Alternative #1: No Action: No direct costs are associated with the “No Action” alternative.

Alternative #2: Repair, Encapsulation, Operation and Maintenance (O&M): Direct costs would be incurred from relocation of business or uses of the buildings being remediated. No new use is projected for these buildings if the asbestos was abated via encapsulation in Alternative #2. An extensive Operation and Maintenance Plan and associated costs will be required. Major private investment and public funding for adaptive reuse and redevelopment, which are enabling other Mill buildings to be revitalized, would not be leveraged if the asbestos contamination remains in place. In addition, asbestos encapsulation typically just defers the time when the asbestos will need to be removed. All future renovations to an area which has asbestos encapsulation will require the removal of the asbestos, adding that cost to the planned renovation.

Alternative #3: Removal and Offsite Disposal: The estimated cost is approximately \$598,000 for remediation and removal of the ACM in the roofing materials, windows, door caulk and adhesive and insulation and other hazardous materials. Some costs may be offset by salvaged materials and recycling.

Recommended Cleanup Alternative

The recommended cleanup alternative is **Alternative #3: Removal with Offsite Disposal.**

Alternative#1: No Action

The No Action alternative cannot be recommended since it does not effectively address public health risks posed by the Hazardous Materials when the site is redeveloped. In addition, this alternative does not allow the achievement of the project goal of reuse, redevelopment and job creation. Extensive redevelopment of the historic mill and the adaptive reuse of several historic buildings could not occur.

Alternative #2: Encapsulation, Repair and Maintenance

The encapsulation, repair and maintenance alternative cannot be recommended since it does not address site risks posed by the hazardous materials. Although Alternative #2 is less expensive than removal and offsite disposal, it would require ongoing costs potentially including air monitoring and maintenance. Using asbestos encapsulation also only defers the time when the asbestos will need to be removed. Any proposed renovations for adaptive reuse and redevelopment to buildings or areas containing asbestos after encapsulation will require the removal of the asbestos, adding to the cost of renovation for the adaptive reuse or demolition planned. This makes Alternative #2 more difficult to implement than Alternative #3. In addition, this alternative does not enable the achievement of the project goals.

Alternative #3: Removal and Remediation with Offsite Disposal

This Alternative would achieve a permanent solution of preventing exposure by removing contamination at the site. Removal of the asbestos from the roof, windows and doors will enable the demolition and/or adaptive reuse redevelopment program at the Mills to proceed. Costs of ACM removal will not be included piece meal as buildings are

rehabilitated and there may be cost savings from bidding a larger project. Removal will also accelerate the overall project timeline by making other nearby buildings readily available including the adjacent Mill 11. In addition, an opportunity currently exists with the abandonment and demolition to efficiently remove whole sections of asbestos roofing, quickly bag these items and remove them for proper disposal. Finally, the removal and remediation with offsite disposal of asbestos and demolition of the resulting unsafe structures is an eligible cleanup cost under the EPA grant. This is not the case with the funds received for the other environmental remediation work at Ludlow Mills from the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA), so this grant funding is critical to the ongoing remediation and redevelopment of the site.

Alternative #3 protects public health to the greatest extent and has the benefit of achieving the desired results for the long-term benefits of the project. For these reasons, Westmass has selected **Alternative #3: Removal and Remediation with Offsite Disposal** and complete cleanup as the preferred Alternative and will be submitting this Alternative as a Grant Application to the FY 2023 US EPA Brownfield Cleanup program.

Sources:

Targeted Brownfields Assessment Report, Nobis Engineering, Inc. June 2018. Prepared for EPA Region 1.

Asbestos and Hazardous Materials Budget, 300s Warehouse Buildings, O'Reilly, Talbot & Okun, December 2021, Prepared for Westmass.

ATTACHMENT F: Analysis of Brownfield Cleanup Alternatives (ABCA) - Preliminary Evaluation Asbestos Removal and Remediation

**PROJECT: Mill Buildings 46 & 58 - Roof, Interior Tiles and Window Glazing
Ludlow Mills Complex, 100 State Street, Ludlow, MA 01056**

This Analysis of Brownfield's Cleanup Alternatives (ABCA) is intended to provide a cleanup project summary outline in support of a pending Grant Application to the FY 2023 US EPA Brownfield Cleanup program.

Release Tracking Number

The Massachusetts Department of Environmental Protection (MADEP) does not assign specific tracking numbers to asbestos abatement projects such as the one proposed for Ludlow Mills. Release Tracking Numbers (RTNs) however were issued related to the AAI- ASTM Phase I and Phase II Environmental Site Assessment Reports and several other sites at Ludlow Mills where contamination has been cleaned up with State Site Remediation Grant funds. That remediation work was completed in June of 2014.

**Prepared by: Westmass Area Development Corporation, Owner of the Property One Monarch
Place, Suite 1350
Springfield, MA 01144
www.westmassdevelopment.com**

I. INTRODUCTION & BACKGROUND

a. Site Location

The project is located at 100 State Street in Ludlow, Massachusetts within the historic Ludlow Mills Complex and specifically involves two attached buildings known as Mill Buildings 46 & 58 which are located in the western portion of the mill complex.

b. Previous Site Uses and any Previous Site Cleanup / Remediation

Previous Site Use(s):

The project area on the Chicopee River has been utilized by industry since the late eighteenth century. Between 1812 and 1844 the site supported operation of textile and cotton mills. Gun barrels were manufactured at the site of the current Mill No. 8 building from 1840 to 1846. Between 1846 and 1848 the building was used for the manufacturing of textile machinery. Starting in 1850, Jute products were produced on the property and the Ludlow Manufacturing Company was established in 1856, later named the Ludlow Mills Company.

Jute manufacturing remained the primary activity on the site into the mid-20th century. A majority of the historic mill buildings, including **Mill Buildings 46 & 58**, remain from the early 20th century having been built starting in 1900 with significant mill expansion over time. The historic mill complex is approximately 52 acres in size and contains approximately 35 structures with a total floor space of approximately 1,200,000 square feet. Since the 1960's the complex has been a multi-tenant industrial park and contains a large number of commercial and industrial operations. Of the site's extant mill buildings, five are large multi-story structures (Mill #s 8, 9, 10 and 11, and the 300s Warehouse buildings along State Street); a series of small (approximately 6,000-12,000 SF), single story, brick block stockhouses located along the Chicopee River in the south and eastern portion part of the site; and the former locomotive building and associated maintenance **building (Buildings 46/58)** and the former carpentry building (#44). The Ludlow Mills complex is included within the Ludlow Village National

Historic District (LUD.F) and listed in the State and National Registers of Historic Places.

Previous Site Clean-up and Remediation:

Under the previous site ownership of Ludlow Industrial Realty Inc., a Phase I Environmental Site Assessment (ESA) was prepared in March 2009 by Advanced Environmental Solutions, Inc. (AES) for the US Environmental Protection Agency (EPA). That Phase I ESA was updated by AES in August 2011. In addition, AES prepared a Phase II ESA for the property between September 2010 and June 2011.

The Phase II Environmental Site Assessment (ESA), performed in 2010 and 2011, identified several Recognized Environmental Conditions (RECs). Subsequent environmental assessment activities including limited testing were conducted. The results were compiled in the Phase II ESA dated August 2011, in which 18 RECs existed. These RECs related to industrial use of the property and other subsequent tenants, the illegal disposal of materials, and the use of an up-gradient property as a gasoline station. The report indicated recommendations for additional assessment.

Known releases at the Ludlow Mills property identified in the Phase I and Phase II ESAs include releases of polychlorinated biphenyl (PCB) from transformers, #6 fuel oil from the use and storage of heating oil, and diesel fuel from a delivery truck. Releases of PCBs were concentrated around electrical substations to the north of Mill building 10 and on the bank of the Chicopee River. Contaminated soil that was accessible at the time was removed from these areas, however, residual contamination remained underneath the substations and an Activity and Use Limitation (AUL) is in place in order to limit exposure should the contaminated soil be disturbed. The AUL was terminated in 2014. Historically, several releases of fuel oil were reported near stockhouse #205, which served as the Boiler Building, as a result of filling operations of the two 15,000-gallon fuel oil underground storage tanks (USTs) used for fuel oil storage. Soil in the immediate area around the tanks was excavated and impacted water in storm drains was cleaned up. The two USTs were removed in April 2012.

Westmass and its consultant at that time, O'Reilly, Talbot and Okun Associates, Inc. (OTO), developed a Remediation Plan, (excluding asbestos) for implementation. The estimated cost of implementation of the Remediation Plan for the Recognized Environmental Concerns identified in the Phase I and II reports was estimated to be \$1,500,000. Funding was secured from the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA) through a \$1,500,000 grant awarded to Westmass for site remediation of the Ludlow Mills property. Westmass actively implemented the Remediation Plan and finalized this remediation work in June of 2014.

c. Site Assessment Findings – Hazardous Materials

In September 2022, a Draft Targeted Brownfields Assessment Report was prepared O'Reilly, Talbot & Okun in order to determine other sources of asbestos contamination in **Buildings 46 & 58**. The Report confirmation ACM in roofing materials, windows, door caulk and other adhesives and insulation as well as lead paint in the interior of both buildings.

Constructed in 1915, **Mill Buildings 46 & 58** are two attached structures that were used as the locomotive barn and machine shop for the historic rail system within the Ludlow Mill complex. Building 46 is a one-story building with a 23' high ceiling that provided storage for the locomotives. It has a dirt floor and 10 large windows on the south and north facades. ACM was found in the roofing as well as the window glazing. Building 58 is a 2-story structure with slab on grade, concrete flooring and 20 windows. ACM was identified in the window glazing and in the bathroom floor tiles.

d. Project Goal

The Ludlow Mills Preservation and Redevelopment Project continues to reverse years of neglect at the mill complex and will continue to spur local and regional economic activity and job creation. By remediating numerous environmental hazards & asbestos contamination, the project will protect sensitive environmental resources and provide the community with public access to the Chicopee River for passive recreation.

Redevelopment and revitalization of the Ludlow Mills complex is a regionally significant economic development project and has been cited within the 2019 Annual Comprehensive Economic Development Strategy (CEDS) report of the Pioneer Valley Plan for Progress, as a regional “High Priority Project”. The intent is to serve areas meeting US Economic Development Administration Economic Distress Criteria according to the Pioneer Valley Planning Commission.

Westmass plans to redevelop the complex with green technologies including solar and low impact development storm water (LID) systems. The overall project embraces sustainable development principles and seeks to meet USGBC LEED quality standards for new construction at the site. The project's primary focus will be on commercial and industrial development but with a number of residential housing units created in the larger mill buildings where possible.

Westmass has been successful in obtaining assistance and cooperation from several sources at the Federal, State and Local levels as well as private utilities for redevelopment efforts. The direct involvement and support from the start of this regionally significant project by federal and state officials, numerous elected officials and the community of Ludlow have been instrumental. Westmass is committed to seeing that the Ludlow Mills once again becomes a major contributor to the economic prosperity of the region.

To date, the Ludlow Mills Preservation and Redevelopment Project has achieved numerous milestones highlighted below:

- In 2022, Westmass was awarded two grants from MassDevelopment through the Massachusetts Community One Stop for Growth Program. \$500,000 was awarded for Electrical upgrades and \$500,000 was awarded for new roofs.
- In 2021, Westmass received two grants from MassDevelopment through the Massachusetts Community One Stop for Growth Program. \$650,000 was received from the Site Readiness Program to fund the design and engineering of infrastructure improvements within the mill complex and \$250,000 was received from the Underutilized Properties Program to fund capital improvements on several stockhouse buildings.
- In 2021, Westmass also received an EPA Brownfields Cleanup Grant to remediate ACM in the roofing of several historic stockhouses as well as the former Carpentry Building.
- Winn Development is currently proposing to adaptively reuse Mill #8 (the iconic clocktower building) as residential housing using historic tax credits. This represents an approximate \$58 million investment.
- With a \$7 million investment, the Town of Ludlow is completed a new Ludlow Senior Center State Street on mill land formerly owned by Westmass on State Street.
- In 2019, the Town of Ludlow, in partnership with Westmass, received \$6.6 million in grant funds from the MassWorks Infrastructure Program and the US Department of Commerce Economic Development Administration to construct a 4,200 linear foot roadway and associated infrastructure within the mill complex to advance revitalization efforts.
- Westmass has received \$2 million of private financing for project development from a consortium of regional lenders.
- Westmass has received approval of the delineation of wetlands and riverfront area under the

- Massachusetts Wetlands Protection Act from the Ludlow Conservation Commission.
- Westmass secured State permitting from MEPA for the Final Environmental Impact Report in September 2017 with the issuance of a Certificate of the Secretary of Energy and Environmental Affairs.
 - With input from Westmass, the Town of Ludlow voted to change the zoning for the site from Industrial A to Mill Redevelopment District, to allow mixed use development. In addition, the Town created a Smart Growth Overlay District, Ludlow Mills Sub-District.
 - The Town of Ludlow received \$3.7 million in funding for the reconstruction of State Street and First Avenue, replacement of water lines, and installation of streetscape improvements and a sewer pump station.
 - In 2017 Winn Development, utilizing Historic Tax Credits as part of the financing package, completed a \$24 million, adaptive reuse of Mill #10 to provide 55 units of Senior Independent Living.
 - The \$27 Million dollar HealthSouth Rehabilitation Hospital Project (Private) was completed in November 2013 and achieved LEED HC Gold certification.
 - Westmass received a \$1.5 million grant from the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA) for environmental remediation work (excluding asbestos) at Ludlow Mills.
 - Westmass was awarded a total of \$400,000 with two separate FY13 US EPA Brownfield Cleanup Grants for the Phase II portion of the Ludlow Mills Asbestos Abatement and Removal involving ACM abatement and demolition of Storehouse building 286-291 and Storehouse building 292-296.
 - In 2012, Columbia Gas invested in excess of \$600,000 to complete construction of a new intermediate pressure natural gas line along the length of State Street.
 - Westmass was awarded a \$200,000 FY12 US EPA Brownfield Cleanup Grant for the Phase I portion of the Ludlow Mills Asbestos Abatement and Removal involving ACM Pipe Wrap on existing abandoned steam piping in mill buildings #s8 and 11 and the #300s buildings.
 - Westmass Area Development Corporation purchased the property on August 24, 2011.
 - Between 2009 and 2011, the Project received \$231,000 in funding from the U.S. Environmental Protection Agency for environmental site assessment.

II. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

Cleanup Oversight Responsibility – Westmass Area Development Corporation will be responsible for oversight of the Asbestos Removal and Remediation. In a public bid process following set procurement guidelines, Westmass will solicit and select an Environmental Engineer for project planning, oversight and assistance with the selection of a Licensed Abatement Contactor with a Licensed Inspection / Testing Firm. Selections will be based both on qualifications and costs.

a. **Cleanup Standards for Major Contaminants**

Laws and regulations are applicable to the removal and disposal of Asbestos materials as Hazardous Waste. These standards are in place to prevent it from becoming airborne and harmful to workers or the public. Regulations include Federal laws and worker protection standards from exposures, address transportation of asbestos waste, and limit air pollutants under National Emissions Standards for Hazardous Air Pollutants.

Massachusetts Laws and Regulations require notification and work practices to avoid fiber release for asbestos handling, removal, storage, transport, and disposal. Regulation also requires inspection of demolition/renovation and manufacturing operations and special waste landfilling of asbestos and asbestos-containing material.

b. Laws and Regulations Applicable to the Cleanup

Federal Regulations

- Brownfields Revitalization Act
- Davis / Bacon Act
- OSHA: Regulations: 29 CFR Parts 1910 & 1926.
- DOT: Title 49, section 173.1090.
- EPA: (NESHAP): 40 CFR Part 61 Subpart M.
- Emergency Response Act (AHERA) 40 CFR Part 763
- Toxic Substances Control Act (TSCA).

Massachusetts Regulations

- 310 CMR 7.00: AIR POLLUTION CONTROL specifically section 7.09: Dust, Odor, Construction and Demolition,
- Regulations: 310 CMR 4.00 (Air quality notification approval timelines and fees), 7.00, 7.09(5), 7.15 (Air quality asbestos regulation) and 310 CMR 19.061 (disposal requirements) and 310 CMR 16.00 (landfill siting; asphalt-brick-concrete recycling).
- Massachusetts Department of Environmental Protection and its Bureau of Waste Site Cleanup (DEP-BWSC), regulates cleanup of hazardous materials. Material containing asbestos must be reported if released to the environment or if it poses a threat of release, Regulations: 310 CMR 40.0000.
- The Massachusetts Department of Public Health's (DPH) State Sanitary code requires that property owners must maintain asbestos in good repair. Any repair and removal of asbestos must be done in accordance with all DEP and DPH asbestos regulations, Regulations: 105 CMR 410.353 (Sanitary Code) 105 CMR 670 (Community Right-to-Know).
- Mass Department of Occupational Safety (DOS) prescribes training, certification and/or licensing requirements for persons and firms engaged in asbestos work, inspections, monitoring, laboratories and training providers. DOS also prescribes project notification and work practice requirements for asbestos work.

Local Regulation and Project Coordination

Westmass, along with its Licensed Abatement Contactor and Licensed Inspection / Testing Firm, will coordinate with the Ludlow Building Commissioner and the Ludlow Board of Health as applicable for this cleanup. Westmass, and its contractors, will obtain required sign offs and will take all cautions practicable to prevent any condition that may affect the health or safety of the public or occupants of Ludlow Mills.

Other applicable regulations include Federal, state, and local laws regarding procurement of contractors conducting the cleanup will be followed. In addition, all appropriate permits will be acquired prior to the work commencing such as Dig Safe, Transport and other Asbestos MADEP Asbestos Abatement Notification filings.

III. EVALUATION OF CLEANUP ALTERNATIVES

a. Cleanup Alternatives Considered

To address contamination at the Site, three different alternatives were considered as follows:

- Alternative #1: No Action,
- Alternative #2: Repair, Encapsulation and Ongoing Maintenance, and
- Alternative #3: Removal and Offsite Disposal.

b. Effectiveness, Implementability & Cost of Cleanup Alternatives

Effectiveness

Alternative #1: No Action: This Alternative is not an effective option in controlling or preventing the exposure of persons or the environment to contamination at the site. No Action is included in this evaluation in order to compare and contrast any significant reduction in site risk to other remedial actions to.

The No Action Alternative would severely restrict the ability of Westmass to move forward with the adaptive reuse of these mill buildings. As outlined previously there has been significant investment to date from both public and private funding for the Ludlow Mills project which would be significantly impacted and stranded.

The No Action Alternative does not meet the goal of the redevelopment of the Ludlow Mills because adaptive reuse of the buildings or removal of unusable or unstable buildings cannot occur unless the asbestos is removed.

Alternative #2: Repair, Encapsulation, Operation and Maintenance (O&M): Repair and encapsulation could be an effective way to prevent persons from coming into direct contact with asbestos in the Mill Area if the encapsulation is maintained. However, encapsulation is not an effective means to control other exposures, such as direct contact risks for occupants of the site over time as well as workers performing the adaptive reuse work planned to revitalize Ludlow Mills. Repair and encapsulation limit the reuse options to those without occupied space such as storage.

Asbestos encapsulation is the process of using a product that either coats or creates a membrane to prevent the asbestos fibers from getting into the air or penetrates the asbestos containing material binding the components together. Asbestos encapsulation can also be done by sealing off any areas containing asbestos with an air proof barrier. In some cases, asbestos encapsulation can be used to avoid the high cost of asbestos removal. Asbestos encapsulation is a cheaper option and is safe as long as the area does not need to be disturbed.

During repair and encapsulation, the Abatement contractor will isolate the portion of the building where repair and encapsulation is taking place most likely with sheets of plastic, and provide self-contained showers and throwaway protective suits to prevent contamination of the workers. All tools and materials used must be sufficiently cleaned and all waste containing asbestos generated by the project such the protective suits will be bagged in plastic, and properly disposed of.

The Environmental Protection Agency does not recommend asbestos encapsulation where the asbestos is more than one inch thick, water damaged, has poor cohesive strength or where the asbestos is accessible to the people who are using the building. In these instances it is better to remove the asbestos to minimize the risk to the occupants of the building.

Alternative #2 would severely restrict the ability of Westmass to move forward with the adaptive reuse of Mill Buildings 46 & 58.

Alternative #3: Removal and Offsite Disposal: Removal and offsite disposal is the most effective way to eliminate risk to humans and the environment at the site, since ACM contamination will be removed, and the exposure pathways will no longer exist. All asbestos-containing materials are totally removed from the roofs and interior spaces of the Mill buildings in question which will facilitate redevelopment activities. No further monitoring or maintenance of the asbestos-

containing materials is needed.

The Abatement contractor will isolate and remove the portion of the buildings where the asbestos removal is taking place with sheets of plastic and provide self-contained showers and throwaway protective suits to prevent contamination of the workers. All asbestos-containing materials will be bagged in plastic, and proper disposal arranged.

An important aspect of asbestos-removal is air quality monitoring by an inspector who will be at the site throughout the abatement work. The selected firm monitoring the project will be completely independent from the contractor performing the work to provide oversight. This independent firm will set up an air monitoring station to ensure that the concentrations of asbestos fibers both inside and outside the work area do not increase beyond standards required by MA DEP.

The Environmental Protection Agency recommends asbestos removal as the best method to minimize the risk to workers or the occupants of the building the public and visitors to the Ludlow Mills complex.

Implementability

Alternative #1: No Action: No Action is a simple alternative to implement since no actions need to be undertaken by the owner.

Alternative #2: Repair, Encapsulation, Operation and Maintenance (O&M): These actions require significant effort and expense to implement given the extent of asbestos contamination on the roof and in the windows in **Mill Buildings 46 & 58**. Repair and encapsulation will require access to all outside and confined spaces that were identified to have asbestos contamination. Testing will be required when the work is being performed. In addition, this alternative may require the long-term installation and monitoring of air quality monitoring stations. Because the site is active with diverse tenants and leasing space and adaptive reuse being planned for the structures throughout the mills, ongoing air sampling equipment, monitoring and maintenance of the encapsulation would require periodic testing and reporting. Because of these reasons this alternative is considered very difficult to implement over the long term.

Alternative #3: Removal and Offsite Disposal: Removal and offsite disposal is moderately difficult to implement. Coordination and testing will be required during cleanup activities (e.g., site control and air handling enclosures, dust suppression and monitoring). A minor increase in traffic will result from additional trucks transporting materials offsite. Testing will be required when the abatement work is being performed however long-term monitoring and maintenance will not be required after offsite disposal. By taking advantage of the asbestos removal, alternative the hazardous materials can be removed intact, placed in bags, sealed, transported, and disposed of offsite. An opportunity currently exists within Mill Buildings 46 & 58 as the buildings are vacant so remediation work can be performed efficiently.

One significant advantage of the Ludlow Mills Asbestos Removal and Offsite Disposal Alternative for Mill Buildings 46 & 58 is that they that can be abated in a controlled operation without impacting other mill structures. The result of the cleanup and potential demolition would be advantageous to the overall Ludlow Mills Preservation and Redevelopment project and consistent with the approved Ludlow Mills Master Plan, approved Local Comprehensive Plan and Massachusetts Environmental Policy Act (MEPA) permitting.

Cost

Alternative #1: No Action: No direct costs are associated with the “No Action” alternative.

Alternative #2: Repair, Encapsulation, Operation and Maintenance (O&M): Direct costs would be incurred from relocation of business or uses of the buildings being remediated. No new use is projected for these buildings if the asbestos was abated via encapsulation in Alternative #2. An extensive Operation and Maintenance Plan and associated costs will be required. Major private investment and public funding for adaptive reuse and redevelopment, which are enabling other Mill buildings to be revitalized, would not be leveraged if the asbestos contamination remains in place. In addition, asbestos encapsulation typically just defers the time when the asbestos will need to be removed. All future renovations to an area which has asbestos encapsulation will require the removal of the asbestos, adding that cost to the planned renovation.

Alternative #3: Removal and Offsite Disposal: The estimated cost is approximately \$50,000 for remediation and removal of the ACM in the roofing materials, window glazing and lead paint abatement. Some costs may be offset by salvaged materials and recycling.

Recommended Cleanup Alternative

The recommended cleanup alternative is **Alternative #3: Removal with Offsite Disposal.**

Alternative#1: No Action

The No Action alternative cannot be recommended since it does not effectively address public health risks posed by the Hazardous Materials when the site is redeveloped. In addition, this alternative does not allow the achievement of the project goal of reuse, redevelopment and job creation. Extensive redevelopment of the historic mill and the adaptive reuse of several historic buildings could not occur.

Alternative #2: Encapsulation, Repair and Maintenance

The encapsulation, repair and maintenance alternative cannot be recommended since it does not address site risks posed by the hazardous materials. Although Alternative #2 is less expensive than removal and offsite disposal, it would require ongoing costs potentially including air monitoring and maintenance. Using asbestos encapsulation also only defers the time when the asbestos will need to be removed. Any proposed renovations for adaptive reuse and redevelopment to buildings or areas containing asbestos after encapsulation will require the removal of the asbestos, adding to the cost of renovation for the adaptive reuse or demolition planned. This makes Alternative #2 more difficult to implement than Alternative #3. In addition, this alternative does not enable the achievement of the project goals.

Alternative #3: Removal and Remediation with Offsite Disposal

This Alternative would achieve a permanent solution of preventing exposure by removing contamination at the site. Removal of the asbestos from the roof and windows will enable the adaptive reuse redevelopment program at the Mills to proceed. Costs of ACM removal will not be included piece meal as buildings are rehabilitated and there may be cost savings from bidding a larger project. Removal will also accelerate the overall project timeline by making these buildings available for immediate redevelopment. Finally, the removal and remediation with offsite disposal of asbestos and demolition of the resulting unsafe structures is an eligible cleanup cost under the EPA grant. This is not the case with the funds received for the other environmental remediation work at Ludlow Mills from the Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA), so this grant funding is critical to the ongoing remediation and redevelopment of the site.

Alternative #3 protects public health to the greatest extent and has the benefit of achieving the desired results for the long-term benefits of the project. For these reasons, Westmass has selected **Alternative #3: Removal and Remediation with Offsite Disposal** and complete cleanup as the preferred Alternative and will be submitting this Alternative as a Grant Application to the FY 2023 US EPA

Brownfield Cleanup program.

Sources:

Asbestos & Hazardous Materials Assessment Report, O'Reilly, Talbot & Okun Engineering, Inc. September 2022. Prepared for Westmass.

PUBLIC NOTICES

Commonwealth of
 Massachusetts
 The Trial Court
 Hampden Probate and
 Family Court
 50 State Street
 Springfield, MA 01103
 (413)748-7758
 Docket No. HD22P2171EA
 Estate of:
 Mary Irene DeMatos
 Date of Death: 08/15/2022
**CITATION ON
 PETITION FOR
 FORMAL
 ADJUDICATION**

To all interested persons:

A Petition for **Formal Probate of Will with Appointment of Personal Representative** has been filed by **Celeste M Fanning of Ludlow MA** requesting that the Court enter a formal Decree and Order and for such other relief as requested in the Petition.

The Petitioner requests that: **Celeste M Fanning of Ludlow MA** be appointed as Personal Representative(s) of said estate to serve **Without Surety** on the bond in **unsupervised administration**.

IMPORTANT NOTICE

You have the right to obtain a copy of the Petition from the Petitioner or at the Court. You have a right to object to this proceed-

ing. To do so, you or your attorney must file a written appearance and objection at this Court before: **10:00 a.m. on the return day of 11/02/2022.**

This is **NOT** a hearing date, but a deadline by which you must file a written appearance and objection if you object to this proceeding. If you fail to file a timely written appearance and objection followed by an affidavit of objections within thirty (30) days of the return day, action may be taken without further notice to you.

**UNSUPERVISED
 ADMINISTRATION
 UNDER THE
 MASSACHUSETTS
 UNIFORM PROBATE
 CODE (MUPC)**

A **Personal Representative appointed under the MUPC in an unsupervised administration is not required to file an inventory or annual accounts with the Court.** Persons interested in the estate are entitled to notice regarding the administration directly from the **Personal Representative** and may petition the Court in any matter relating to the estate, including the distribution of assets and expenses of administration.

WITNESS, Hon. **Barbara M. Hyland**, First Justice of this Court.

Date: October 05, 2022

Rosemary Saccomani
 Register of Probate

10/19/2022

**Notice of Public Meeting
 EPA Brownfields Cleanup
 Grant Application
 for ACM and Hazardous
 Materials Removal /
 Remediation
 Ludlow Mills, Ludlow,
 Massachusetts**

Applicant: **Westmass Area
 Development Corporation**
**Westmass Area
 Development Corporation**
 (Westmass) is applying for a

FY2023 US EPA Brownfield Cleanup Grant for Asbestos and Hazardous Materials Abatement at two sites at the Ludlow Mills. A Public Meeting to solicit and accept public input, as well as review the proposed cleanup project and grant application, is scheduled to be held remotely via **Zoom at 4:00 PM on Tuesday, November 1, 2022.**

Anyone wishing to participate shall, as soon as reasonably possible prior to the meeting, provide notice to Sarah la Cour, VP of Operations at (413)386-3124 Monday-Friday 8:30AM to 4:30AM or by email at s.la-cour@westmassdevelopment.com. Those giving such notice will be provided a link to the meeting. At the start of the meeting, the Westmass representative shall announce those persons participating remotely and the information will be recorded in the meeting minutes. Anyone from the public is invited and welcome to attend. In addition to the grant application, a draft Analysis of Brownfields Cleanup Alternatives (ABCA) for each site will be available, by request, for review and comment.

Westmass will accept comments on the US EPA FY2022 Brownfield Cleanup Grant application and proposed cleanup project prior to the scheduled submittal of the grant application on November 15, 2022. Comments should be submitted in writing to Sarah la Cour, Westmass Area Development Corporation, One Monarch Place Suite 1350, Springfield, MA 01144 or via email at the address above.

10/19, 10/26/2022

Please check the accuracy of your legal notice prior to submission (i.e., date, time, spelling). Also, be sure the requested publication date coincides with the purpose of the notice, or as the law demands. Thank you.



PUBLIC NOTICES

...ing residential struc-
...s, as per submitted
...ns. Lot 1 will require a
...ver of frontage from 140
...110 feet. The plans can
...viewed on the Planning
...rd web site: www.ludlow.
...us/html/planning
...*Please be advised that
...Order of the Governor:
...475. An act relative to
...ending certain COVID-
...measures adopted
...ring the state of emer-
...gency – Please feel free to
...w this meeting via cable
...vision as this meeting
...roadcast live or via live
...eam. Instructions are
...the town's website. You
...y also access the meet-
...by audio by calling
...17-758-8793, attending
...UberConference, or by

attending in person*

If for any reason this hearing is cancelled, it will be rescheduled to Thursday, December 8, 2022 @ 7:00 PM.

Joseph Queiroga
10/26, 11/02/2022

**Notice of Public Meeting
EPA Brownfields Cleanup
Grant Application
for ACM and Hazardous
Materials Removal /
Remediation
Ludlow Mills, Ludlow,
Massachusetts**

Applicant: Westmass Area
Development Corporation

Westmass Area
Development Corporation
(Westmass) is applying for a
FY2023 US EPA Brownfield
Cleanup Grant for Asbestos

and Hazardous Materials
Abatement at two sites at
the Ludlow Mills. A Public
Meeting to solicit and accept
public input, as well as review
the proposed cleanup proj-
ect and grant application, is
scheduled to be held remote-
ly via Zoom at **4:00 PM on
Tuesday, November 1, 2022.**

Anyone wishing to partic-
ipate shall, as soon as
reasonably possible prior to
the meeting, provide notice
to Sarah la Cour, VP of
Operations at (413)386-3124
Monday-Friday 8:30AM to
4:30AM or by email at s.la-
cour@westmassdevelop-
ment.com. Those giving such
notice will be provided a link
to the meeting. At the start
of the meeting, the Westmass
representative shall announce
those persons participating
remotely and the informa-
tion will be recorded in the
meeting minutes. Anyone
from the public is invited and
welcome to attend. In addi-
tion to the grant application, a
draft Analysis of Brownfields
Cleanup Alternatives (ABCA)
for each site will be available,
by request, for review and
comment.

Westmass will accept
comments on the US EPA
FY2022 Brownfield Cleanup
Grant application and pro-
posed cleanup project prior
to the scheduled submit-
tal of the grant application
on November 15, 2022.
Comments should be sub-
mitted in writing to Sarah
la Cour, Westmass Area
Development Corporation,
One Monarch Place Suite
1350, Springfield, MA 01144
or via email at the address
above.

10/19, 10/26/2022

**CITATION ON
PETITION FOR
FORMAL
ADJUDICATION**

To all interested persons:

A Petition for **Formal
Probate of Will with
Appointment of Personal
Representative** has been
filed by **Richard E Patnode
of Westfield MA** requesting
that the Court enter a formal
Decree and Order and for
such other relief as requested
in the Petition.

The Petitioner requests
that: **Richard E Patnode of
Westfield MA** be appointed as
Personal Representative(s)
of said estate to serve
Without Surety on the bond
in **unsupervised administra-
tion.**

IMPORTANT NOTICE

**You have the right to
obtain a copy of the Petition
from the Petitioner or at
the Court. You have a right
to object to this proceed-
ing. To do so, you or your
attorney must file a written
appearance and objection
at this Court before: 10:00
a.m. on the return day of
11/08/2022.**

**This is NOT a hear-
ing date, but a deadline by
which you must file a writ-
ten appearance and objec-
tion if you object to this pro-
ceeding. If you fail to file a
timely written appearance
and objection followed by
an affidavit of objections
within thirty (30) days of
the return day, action may
be taken without further
notice to you.**

**UNSUPERVISED
ADMINISTRATION
UNDER THE
MASSACHUSETTS
UNIFORM PROBATE
CODE (MUPC)**

**in any matter relating to the
estate, including the distribu-
tion of assets and expens-
es of administration.**

WITNESS, Hon. **Barbara
M. Hyland**, First Justice of
this Court.

Date: October 11, 2022
Rosemary A Saccomani
Register of Probate
10/26/2022

**Commonwealth of
Massachusetts
The Trial Court
Probate and Family Court
Hampden Division
Docket No. HD22P2202EA
Estate of:**

**Donald M Scott
Date of Death: 8-28-22
INFORMAL PROBATE
PUBLICATION NOTICE**

To all persons interested
in the above captioned es-
tate, by Petition of Petitioner
Dawn Marie Boghosian of
Ludlow, MA

a Will has been admitted
to informal probate.

Dawn Marie Boghosian
of Ludlow, MA has been
informally appointed as the
Personal Representative of
the estate to serve **without
surety** on the bond.

The estate is being admin-
istered under informal pro-
cedure by the Personal
Representative under the
Massachusetts Uniform Pro-
bate Code without super-
vision by the Court. Inven-
tory and accounts are not
required to be filed with the
Court, but interested parties
are entitled to notice regard-
ing the administration from
the Personal Representative
and can petition the Court
in any matter relating to the
estate, including distribu-
tion of assets and expenses
of administration. Interested

Classifieds

... | SERVING 50 LOCAL COMMUNITIES

...y.com Call us at 413.283.8393

HELP WANTED

TOWN OF WILBRAHAM

**ADMIN. ASSISTANT
ENGINEERING
FIREFIGHTER/EMT
POLICE OFFICER
EMERGENCY DISPATCHER**
...ng to fill several vacancies in
...own of Wilbraham. For applica-
...nd more information please visit
...v.wilbraham-ma.gov. Open
...lled, review of application begins
...ately. EOE

REAL ESTATE

FOR RENT



**EQUAL HOUSING
OPPORTUNITY**

ALL REAL ESTATE advertised
...erein is subject to the Federal Fair

EPA Brownfield Cleanup Grant Application FY23

Westmass Area Development Corporation

Public Meeting

To present and discuss Westmass' application to the EPA for funding for the cleanup of two sites at the Ludlow Mills: The 300s Warehouses and Mill Buildings 46 & 58.

November 1, 2022

Via Zoom

NOTES

The public meeting was opened via Zoom at 4:01 pm on Tuesday, November 1, 2022, by Sarah la Cour, VP of Operations for Westmass Area Development Corporation. Topics for review and discussion were the cleanup grant application narrative and the draft ABCA for each site.

No one from the public attended and no questions or requests for information were received from the public prior to the meeting.

The Zoom meeting was closed at 4:10 pm.