Remediation and Redevelopment of a Brownfields Site
at the Ludlow Mills Complex, Hampden County, Massachusetts
Submitted by Westmass Area Development Corporation (Westmass), December 1, 2021

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: Site Cleanup
   b. Federal Funds Requested: $500,000.00*
      *We are requesting a waiver on the funding limit to $650,000 (see Attachment F)

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

4. Property Site-Specific Information: 300 Series Warehouse Mill Buildings
   Ludlow Mills, 100 State Street
   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
      413-286-3124 (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)

7. **Other Factors Checklist:**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community population is 10,000 or less.</td>
<td>1</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>1</td>
</tr>
<tr>
<td>The proposed brownfield(s) is impacted by mine-scarred land.</td>
<td>2</td>
</tr>
<tr>
<td>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.</td>
<td>2</td>
</tr>
<tr>
<td>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).</td>
<td>1</td>
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<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>1</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>2</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>2</td>
</tr>
<tr>
<td>The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.</td>
<td>1</td>
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</table>

8. **Letter from the State or Tribal Environmental Authority.** Please see the letter on the following page from the Massachusetts Department of Environmental Protection acknowledging that the applicant plans to conduct cleanup activities and is planning to apply for FY22 federal brownfields grant funds.

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
November 4, 2021

U.S. EPA New England
Attn: Frank Gardner
Via email

Subject: STATE LETTER OF ACKNOWLEDGMENT
Westmass Area Development Corporation, Application for EPA Cleanup Grant Funds

Dear Mr. Gardner:

MassDEP is pleased to support the proposal submitted by Westmass Area Development Corporation (Westmass) under the Fiscal Year 2022 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. Westmass intends to use the funding to complete remediation of all hazardous materials within the eight-story brick building commonly referred to as the 300s Warehouses. This building is not feasible for redevelopment due to low ceiling heights and unlevel floors; however, its demolition will enhance redevelopment of the adjacent mill building, with an anticipated result of the employment of 2,000-2,500 people and potentially stimulate up to $300 million of private investment. Redevelopment at Ludlow Mills has already resulted in several successes, including Independent Senior Housing and Healthsouth Rehabilitation Hospital (now Encompass).

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available incentives. MassDEP, through our regional officers, 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 help Westmass make this project a success.

I hope that this information is helpful, and please feel free to contact Angela Gallagher at (617) 620-2626 or via email at angela.gallagher@mass.gov if you have any questions or concerns.

Sincerely,

Paul Locke, Assistant Commissioner
Bureau of Waste Site Cleanup

ec: Jeffrey Daley, Westmass Area Development Corporation
    Caprice Shaw, Brownfields Coordinator, BWSC-WERO
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
   a. Target Area and Brownfields
      i. Background and Description of Target Area
      Located in the Town of Ludlow, Massachusetts (population of 21,103 [US Census, 2010]),
      the target area for this FY22 Brownfield Cleanup Grant request is census tract 8104.03, which
      includes the historic Ludlow Mills complex and the associated downtown and residential area
      within a federally designated Opportunity Zone. This area is approximately one square mile of
      land bounded by the 52-acre mill complex along the Chicopee River to the south and the
      Massachusetts Turnpike (Interstate 90) to the north. The area includes approximately 4,109
      residents and 1,904 households within the historic mill village. The Mills once employed more
      than 5,000 people for production of jute yarns, twine, and webbing and were one of the primary
      economic generators for the region. With the mill closing in the mid-20th century, thousands of
      jobs were lost and the population shrank as residents relocated in search of new employment.
      The target area surrounding the Ludlow Mills continues to experience extreme economic
      hardship compared to the region and state, as well as a continued downward trend of economic
      and demographic indicators. According to American Community Survey (2015-2019) estimates,
      the target area has seen a loss of population of 5.5% since 2014 (compared to a population
      increase of 2.9% across the state as a whole). Median household income for the target area is just
      $50,341 compared to $81,215 in Massachusetts and $62,843 in the nation. In addition, at 17%,
      the number of individuals living in poverty is nearly double that of Massachusetts (9.4%). The
      current owner, Westmass Area Development Corporation (Westmass), oversees the conversion
      of the 100-year-old historic mill complex into a modern mixed-use development which balances
      residential, commercial, and industrial uses with greenspace and recreational amenities. In
      addition to becoming a renewed employment center, the Mills are developing into a rejuvenated
      residential hub with the 2017 conversion of Mill #10 into mixed-income, senior housing as well
      as the anticipated redevelopment of Mill #8 into an additional 92 senior units. The mill complex
      currently contains approximately 30 businesses and 300 employees which are mostly healthcare,
      light industrial, warehousing uses and recreation and hospitality. Westmass is not, nor will assist,
      a federally recognized Indian tribe or United States territory. The target area is also not located
      within a community in which a coal-fired power plant has recently closed or is closing.
      ii. Description of the Proposed Brownfield Site(s)
      The Ludlow Mills complex is approximately 52 acres and has been identified by the US EPA as
      a 2020 Brownfields Success Story (EPA 560-F-20-011). The more than 100-year-old complex
      runs approximately 1.5 miles along the Chicopee River, placing the site within a federally
      designated flood plain and has been utilized for various manufacturing operations but primarily
      textiles and jute. A majority of the extant mill buildings were constructed at the turn of the 20th
      century and include several 1-8 story, brick and masonry buildings containing approximately 1.2
      million square feet. Westmass analyzed the data from the June 2018 Draft Targeted Brownfields
      Assessment Report, prepared by Nobis Engineering for EPA Region 1, to determine sources of
      asbestos contamination. One site that was identified as needing remediation in order to advance
      redevelopment efforts is the 300s Warehouse buildings where the jute was stored. The 300s
      Warehouses (the Site), which are located adjacent to Mill #11, 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 300s Warehouses contain ACM in the roofing materials, floor tiles and window and door caulking as well as other hazardous materials including lead paint and bulbs and ballasts. The proposed brownfield site is not impacted by mine-scarred land.

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. The remediation and demolition of the 300s Warehouses will provide the necessary space for parking and amenities for the adaptive reuse of Mill #11. The planned mixed-use redevelopment of Mill #11 is a continuation of ongoing redevelopment efforts, in particular the conversion of neighboring Mill #10 into affordable housing completed in 2017, and the anticipated redevelopment of Mill #8 which is set to begin construction in Spring 2022, both projects in partnership with Winn Development. Throughout significant site remediation and redevelopment projects at the mills, 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. 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 Pioneer Valley Planning Commission. The Mills’ location serves an area identified as meeting US Economic Development Administration Economic Distress Criteria as well as a designated federal Opportunity Zone.

   ii. Outcomes and Benefits of Reuse Strategy
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 dollars. Located within an Opportunity Zone, the presence of hazardous material hinders the interest of developers and their lenders. Removing all identified asbestos containing materials and other hazardous materials as part of a comprehensive environmental cleanup is necessary to allow for private investment in adaptive reuse and redevelopment. Massachusetts Regulations (453 CMR 6.00) require asbestos be removed from buildings that are going to be adaptively reused or demolished. In the case of the 300s Warehouses, demolition is necessary given the Warehouses’ low 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 connectivity with the town park and
Riverwalk located within the surrounding mill complex and along the adjacent Chicopee River. As part of Mill #11 redevelopment, rooftop solar will be considered along with other energy efficiency measures. In a 2018 report completed by Green Earth Energy, Mill #11 was reviewed for its solar potential which estimated the building’s capacity for a 668.25 KW DC solar system. Westmass will also 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.

c. Strategy for Leveraging Resources
   i. Resources Needed for Site Reuse
Due to the increased size of Mill #11, a substantial level of investment will be needed (for reference, Mill #10 leveraged $19.3 million and Mill #8 is expected to represent a $29.9 million investment or greater). Westmass is committed to bringing Mill #11 to its full redevelopment potential, including through partnerships with private developers as well as securing public and private financing where available to ensure the project’s success. Within the past year, through the FY21 Massachusetts Community One Stop for Growth, Westmass has been awarded $250,000 from the Underutilized Property Program for capital improvements on nearby mill buildings and $650,000 from the Site Readiness Program to undertake design and engineering of multiple infrastructure projects within the mill complex. These include a new water and sewer loop through the center of the complex adjacent to Mill #11, development of the Ludlow Mills Business Park in the mill complex’s adjacent vacant parcel, four parking lots within the core of the complex and the rerouting of antiquated electrical systems. Once constructed, these projects will advance redevelopment activities across the mill property, and complement the work proposed in this application. 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. In addition, Massachusetts offers several funding programs which may be used to aid the remediation and redevelopment of these sites. The Massachusetts Brownfield Program through MassDEP provides technical assistance and financial incentives for cleanup and redevelopment of contaminated properties. MassDevelopment offers remediation grant funds through the Brownfields Redevelopment Fund. Private investment opportunities will also 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.

   ii. Use of Existing Infrastructure
The Site and adjacent Mill #11 redevelopment activities will be critically supported by the proposed infrastructure upgrades, described above, being made to service the Ludlow Mills property. 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 property. 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 sewer, and storm drainage infrastructure within the mill complex to advance revitalization efforts. Once completed, Riverside Drive will become a public way and will provide key frontage, access and infrastructure for the continued redevelopment of the property. 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 Mills in the mid-20th century and the subsequent loss of employment and tax revenues, the community became 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. Increased policing is needed on the site due to the large number of vacant buildings and adjacent woodland areas. Particularly, during the COVID-19 pandemic, there has been a significant uptick in the frequency of break-ins and vandalism on the site, requiring increased surveillance and police presence. Also, due to the Mills’ aging infrastructure, failures of the fire suppression systems frequently occur requiring regular visits by the Ludlow Fire Department. 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 presence of hazardous materials on the site further compounds the challenge of attracting new investment and hinders the community’s goal of the site once again becoming a major contributor to the local tax base. The cleanup, and ultimate demolition, of the 300s Warehouses will allow for significant redevelopment potential for historic Mill #11 into a mix of residential and commercial uses.
   
   ii. **Threats to Sensitive Populations**

   (1) **Health or Welfare of Sensitive Populations**

   The redevelopment of the mill complex hinges on the cleanup of all asbestos, located within many buildings’ roofing materials as well as on interiors including window glazing and floor tiles. If this situation is not addressed the asbestos will become friable and pose a risk to senior residents, families, workers, and other visitors of the property. Asbestos present at Ludlow Mills is known to cause asbestosis and various forms of cancer. Removal of this hazardous material will remove a direct health threat to the people who are currently employed by the 30 active businesses at the mill complex, the 55+ senior residents living on site at the Residences at Mill #10, the new residential units to be constructed in Mill #8, anticipated in 2022, residents 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 working in the downtown area.

   (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 as one of the 20 largest communities 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 is shown to have a significant impact on Ludlow and across Hampden County due to a variety of mobile and point sources, with risk of cancer from breathing air toxins being 80% higher than the state. Already Massachusetts has one of the highest rates of asthma within the United States; in 2015, 10.2% of Massachusetts residents reported having asthma compared to 9.2% of individuals in the nation (2017 State Health Needs Assessment). The prevalence in Massachusetts children was as high as 12.9%. 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. As roofs and building structures at the Ludlow Mills continue to deteriorate, the emission of toxins related to asbestos contamination could rise.

(3) Promoting Environmental Justice

The Ludlow Mills complex is located within Block Group 3, Census Tract 8104.03. This block group is an Environmental Justice (EJ) population based on low-income characteristics. According to American Community Survey (2015-2019) Estimates, median household income within the EJ area ($50,341) is just 62% that of the Massachusetts median. Median housing value is even lower, just 40% that of the state (approximately $170,000 compared to $420,000). Compounding the threat to vulnerable populations is the comparatively low rate of individuals with health insurance coverage. 6.1% of individuals within the target area are without health insurance, which is more than double that of the county (3.0%) or the state (2.8%). Of those making less than $25,000, a staggering 18.1% of residents in the target area are without health insurance. 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 as well as remediate all environmental risks associated with the historic mill property. Since acquiring the property in 2011, Westmass has worked hard to attract new 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, including the senior residents of Mill #10. The Ludlow Mills Redevelopment Project promotes access to much needed green space in the form of a town park and the heavily used public Riverwalk along the Chicopee River. Through this grant, Westmass will be able to remove a large source of environmental hazard and blight in the form of the 300s Warehouses, as well continue redevelopment activities of the adjacent Mill #11, which is anticipated to be a mixed-use adaptive reuse project with an affordable housing component on the upper floors.

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 redevelopment of the Ludlow Mills brownfield site, including the following:

<table>
<thead>
<tr>
<th>Project Partner</th>
<th>Point of contact</th>
<th>Specific role in the project</th>
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<tbody>
<tr>
<td>Town of Ludlow</td>
<td>Ellie Villano, Town Administrator (413) 583-5600 ext. 1200</td>
<td>The Town of Ludlow’s various boards, commissions, and staff are integral partners in this cleanup effort and are directly involved in the permitting and approvals process for reuse and redevelopment activities on the site.</td>
</tr>
<tr>
<td>Economic Development Council (EDC) of Western Massachusetts</td>
<td>Rick Sullivan, President &amp; CEO (413) 755-1300</td>
<td>The EDC will continue to be an essential partner in helping Westmass disseminate information regarding cleanup activities, as well as working with the local Chambers of Commerce to help market sites for redevelopment.</td>
</tr>
<tr>
<td>MassHire Workforce Board</td>
<td>David M. Cruise (413) 755-1362</td>
<td>Westmass will continue to work together with the MassHire on tracking benefits of the project in the form of job creation and retention.</td>
</tr>
<tr>
<td>Pioneer Valley Planning Commission (PVPC)</td>
<td>Becky Basch, Senior Planner (413) 781-6045</td>
<td>PVPC, the regional planning agency for Hampden and Hampshire County, is a valuable resource of regional social, economic, and health data and monitors the regional impacts of redevelopment activities.</td>
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<tr>
<td>Local Elected Officials</td>
<td>Congressman Richard Neal (413) 785-0325 Eric Lesser, State Senator (413) 526-6501 Jake Oliveira, State Representative (617) 784-5151</td>
<td>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 local elected officials are valuable advocates for Westmass’ work and will continue to help identify new redevelopment opportunities and funding sources to complement all cleanup activities.</td>
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### 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 Westmass office in Springfield and on the westmassdevelopment.com website; (3) engaging the tenants within the Ludlow Mills Complex; (4) posting public notices in various locations, including online, for all public meetings and invite stakeholders and local residents to attend; and (5) 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. Westmass publicized its intent to seek EPA Brownfields Cleanup funding at the Ludlow Mills in both the local newspaper and on its website (Attachments B and C). Westmass remotely held a community wide public meeting to review the pending grant application and the Draft Analysis of Brownfield Cleanup Alternatives (ABCA) (Attachment D) for the proposed cleanup. Westmass did not receive any comments on the ABCA. Upon award, Westmass will hold a post-award public meeting to solicit comments, distribute the cleanup plan and request input by businesses utilizing space at the mill complex as well as other stakeholders including the MassDEP, MDOS, Ludlow Board of Health and Ludlow Building Commissioner.

### 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 a specific site at the Ludlow Mills, the 300s Warehouses, in order to further revitalization activities at this location. As part of the overall Comprehensive Plan for the Ludlow Mills, the cleanup of this site is integral to securing private investment for redevelopment. Removal of the 300s Warehouses is consistent with the long-term vision for the Ludlow Mills and substantial redevelopment of Mill #11. Based on the Draft ABCA, the most effective method to eliminate risk at the site 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, senior residents of Mill #10 and future residents of Mill #8, and recreational users of the site. Cleanup for this project involves Westmass hiring an environmental engineering firm with the appropriate qualifications to prepare an Asbestos Removal Cleanup Plan including a Health & Safety Plan which will meet all EPA and MassDEP requirements. 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 hazardous materials removal and offsite disposal will occur as part of the overall redevelopment of the site property. The abatement contractor will remove all ACM and other hazardous materials, as much as possible intact, and bag and seal for proper disposal offsite.

**b. Description of Tasks/Activities and Outputs**

i. **Project Implementation, Anticipated Project Schedule, Task/Activity Lead, and Outputs**

<table>
<thead>
<tr>
<th>Task 1: Cooperative Agreement Oversight</th>
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<tbody>
<tr>
<td><strong>i. Project Implementation</strong></td>
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<tr>
<td>• 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).</td>
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<tr>
<td>• The QEP will prepare all cleanup plans; will develop an EPA standard QAPP and ACM abatement and post abatement demolition scope, a Public Bid package and conduct the competitive Public Bid Process for Abatement Contractor selection.</td>
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<td><strong>ii. Schedule</strong></td>
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<tr>
<td>Procurement of the QEP and Abatement Contractor to be completed within 1 to 3 months of award, and ongoing through project completion.</td>
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<tr>
<td><strong>iii. Task Lead</strong></td>
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<tr>
<td>Sarah la Cour, Westmass Project Manager and QEP</td>
</tr>
<tr>
<td><strong>iv. Outputs</strong></td>
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<tr>
<td>Final executed Cooperative Agreement; Quality Assurance Project Plan (QAPP); and project progress reports submitted to ACRES database</td>
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<th>Task 2: Community Outreach &amp; Engagement</th>
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<tr>
<td><strong>i. Project Implementation</strong></td>
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<tr>
<td>• Westmass will hold a pre-project public meeting with the QEP to prepare the Community Involvement Plan and notify all appropriate parties in writing of the scheduled cleanup. The QEP will conduct frequent visits, engage in public outreach particularly with the businesses at the Ludlow Mills and finalize ABCA with their input.</td>
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<tr>
<td><strong>ii. Schedule</strong></td>
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<td>Ongoing throughout the project.</td>
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<tr>
<td><strong>iii. Task Lead</strong></td>
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<tr>
<td>Sarah la Cour, Westmass Project Manager and QEP</td>
</tr>
<tr>
<td><strong>iv. Outputs</strong></td>
</tr>
<tr>
<td>Creation of a Community Involvement Plan and final ABCA</td>
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<th>Task 3: Site-Specific Activities</th>
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<tr>
<td><strong>i. Project Implementation</strong></td>
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<tr>
<td>• The abatement contractor licensed by the MADOS will execute all cleanup activities; follow the approved plan; isolate where the asbestos removal is taking place; and will provide all appropriate measures to prevent contamination of workers, disposal and building demolition after abatement. All work will be completed in accordance with State (MADOS and MassDEP) and federal requirements.</td>
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<tr>
<td>• Air quality monitoring on-site will be conducted during cleanup.</td>
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<td><strong>ii. Schedule</strong></td>
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<td>To begin within 3 months of award and continuing for 6 months.</td>
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<tr>
<td><strong>iii. Task Lead</strong></td>
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<tr>
<td>Abatement Contractor with oversight and independent monitoring to be overseen by selected QEP.</td>
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<tr>
<td><strong>iv. Outputs</strong></td>
</tr>
<tr>
<td>Full asbestos abatement of the three sites</td>
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Task 4: Oversee Site Cleanup
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.

### 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, Application of Cost Estimates, and Eligibility of Cost Share Activities

**Task 1: Cooperative Agreement Oversight**

**Personnel:** Preparation of procurement documents, and overall project coordination.

- Senior Project Manager at $100/hr for 47 hours = $4,700.00
- Assistant PM at $80/hr for 42 hours = $3,360.00

**Supplies:** Total cost of $250.00 for printing materials.

**Contractual:** Qualified Environmental Professional (QEP) at $215/hr for 56 hours = $12,040.00 for the preparation of asbestos removal plans, QAPP, and procurement of abatement contractor.

**Task 2: Community Outreach & Engagement**

**Personnel:** Preparation of the pre-project public meeting, Community Involvement Plan, and engagement with the QEP and stakeholders at the project sites.

- Senior Project Manager at $100/hr for 35 hours = $3,500.00
- Assistant Project Manager at $80/hr for 42.5 hours = $3,400.00

**Supplies:** Total cost of $750.00 for printing materials.

**Contractual:** Qualified Environmental Professional (QEP) at $215/hr for 40 hours = $8,600.00 for regular site visits, public outreach, and the finalization ABCA with input from the public.

**Task 3: Site-Specific Activities**

**Personnel:** Project oversight and coordination with project partners, businesses, and other affected stakeholders, as well as reporting on project activities.

- Senior Project Manager at $100/hr for 50 hours = $5,000.00
- Assistant Project Manager at $80/hr for 110 hours = $8,800.00

**Contractual:** Total cost of $710,000.00

**Abatement Contractor:** Total contract of $645,070.00

Abatement of 300s Warehouse Buildings:

- ACM in roofing materials; floor tiles, window and door caulking and adhesives
- Lead based paint to be abated prior to cutting/generating dust
- Regulated hazardous materials including bulbs, ballasts and mercury switches

**Qualified Environmental Professional (QEP)** at $215/hr for 156 hours = $33,540.00 for oversight of all cleanup activities by the licensed abatement contractor.

**Task 4: Oversee Sight Cleanup**

**Personnel:** Tracking and reporting outputs and outcomes of all cleanup activities to EPA’s ACRES database.

- Senior Project Manager at $100/hr for 44 hours = $4,400.00
Assistant Project Manager at $80/hr for 65.5 hours = $5,240.00

**Contractual**: Qualified Environmental Professional (QEP) at $215/hr for 50 hours = $10,750.00 for remainder of project oversight and closeout of cleanup activities.

*Westmass is respectfully requesting a hardship waiver* (Attachment G). If for any reason the hardship waiver is not approved, Westmass will commit financially to the cost share and will dedicate in-kind professional staff time to help oversee and manage the project.

The direct and indirect costs associated with each of the four tasks are presented in the table below:

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Project Tasks ($)</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Task 1</td>
</tr>
<tr>
<td><strong>Direct Costs</strong></td>
<td></td>
</tr>
<tr>
<td>Personnel</td>
<td>$8,060</td>
</tr>
<tr>
<td>Fringe Benefits</td>
<td>$5,370</td>
</tr>
<tr>
<td>Travel</td>
<td>$3,500</td>
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<tr>
<td>Supplies</td>
<td>$250</td>
</tr>
<tr>
<td>Contractual</td>
<td>$12,040</td>
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<tr>
<td><strong>Total Direct Costs</strong></td>
<td>$25,720</td>
</tr>
<tr>
<td><strong>Indirect Costs</strong></td>
<td></td>
</tr>
<tr>
<td><strong>Total Federal Funding</strong></td>
<td>$0</td>
</tr>
<tr>
<td><strong>Cost Share</strong></td>
<td>$25,720</td>
</tr>
<tr>
<td><strong>Total Budget</strong></td>
<td>$25,720</td>
</tr>
</tbody>
</table>

**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 and the entire Ludlow Mills site for future redevelopment. Outside of the regular reporting, Westmass will comprehensively assess costs and potential outcomes of this Cleanup Plan. This will require a Cleanup Planning / Rehabilitation & Redevelopment Study. Progress toward achieving outcomes at the proposed sites will be tracked and evaluated by measurable outcomes including investigating the market for feasible adaptive reuse opportunities, an inventory to identify all hazardous materials on the total floor areas, a cost estimate for the Cleanup Plan, and significant public input and reporting throughout the project.

**4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

**a. Programmatic Capability**

i. **Organizational Structure and ii. Description of Key Staff**

Westmass has a long and successful history of utilizing both federal and state grant funding to complete redevelopment projects and the Westmass team collectively have over 40 years of experience in redevelopment projects, finance, and project management. Westmass has financial and accounting systems in place to track current projects and will set up a separate account to track all expenditures of the EPA cleanup grant. Westmass has experience with issuing Request for Proposals (RFP) to procure a QEP via a competitive procurement process in accordance with federal regulations and will issue an Invitation for Bids (IFB) to hire licensed asbestos abatement contractor in accordance with federal regulations. *Sarah la Cour, Vice President 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. As Project Manager she will be supported by **Sean O’Donnell, Ludlow Mills Facilities Manager**. Sean is a planner with 6 years of experience in mill redevelopment and adaptive reuse. **Jeff Daley, President/CEO** will provide corporate oversight for the grant. Jeff has over 15 years of experience in real estate development, public-private partnership development, construction project development, and government relations.

### iii. 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, the former carpentry building and an annex building within the complex that contained ACM in roofing materials. 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 completion 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 successfully 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 apartment 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.

2. **Compliance with Grant Requirements**

   Westmass has successfully completed four recent 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. 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.
ATTACHMENT A: FY22 Brownfield Cleanup Grant -Threshold Criteria Response

1. Applicant Eligibility

Westmass Area Development Corporation, (Westmass) is a 501c(6) non-profit community development organization eligible to receive EPA Brownfield Cleanup Grant Funding. (Attachment E)

2. Previously Awarded Cleanup Grants

The sites at the Ludlow Mills complex proposed for cleanup under this EPA Brownfield Cleanup Grant application have not been the recipient of EPA Cleanup Grant funds in the past. However, Westmass has 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.

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 Area Development Corporation 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: 300 Series (300s) Warehouses- located in the central portion of the mill complex fronting State and directly north of Mill #11 and east of Mill #10.
B. Address: 100 State Street, Ludlow, MA 01056 (Hampden County)- for the entire mill complex.
C. Current Owner: Westmass Area Development Corporation owns the above site.

6. Status and History of Contamination at the Site

A. Hazardous Substances: ACM has been confirmed in the tar and paper roofing and roof sealant as well as in floor tiles, and window and door caulk. Other hazardous materials have been confirmed in bulbs, ballasts and mercury switches.

B. Operational History and current Use: The site has been used for various manufacturing operations over the past 150 years to create gun barrels, textiles and jute. The historic mill buildings currently 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 mill complex is currently utilized by a mix of small light industrial companies, storage warehouse operations and brewery operations that lease space from Westmass. The 300s Warehouses were used to store the manufactured jute prior to being shipped off property.

C. Known Environmental Concerns: Phase I and Phase II Environmental Site Assessments (ESA) were completed in 2009 and 2011. 18 locations of Recognized Environmental Concerns (REC’s) were identified within the historic mill complex in the Phase II ESA. The majority of these REC’s have been cleaned up under a MA EOEEA $1.5 million State funded site remediation grant. The final Release Action Outcome (RAO) for those cleanup activities was submitted to MA DEP.

In the 2018 Nobis Assessment Report prepared for the EPA Region 1, materials in the 300s Warehouse buildings identified as ACM include 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. LBP (i.e. lead at a concentration greater than 0.5% by weight) was identified in/on green metal doors, yellow/green painted wood, white painted panelboard, and grey painted brick. PCBs were detected above the TSCA 1.0 ppm cleanup standard for “high occupancy areas” in 5 of the 15 samples submitted for analysis. Materials that returned results greater than 1.0 ppm include black floor sealant and white caulk on exterior cement board. None of the sampled materials were identified as PCB bulk product waste (PCBs ≥ 50 ppm). Hazardous materials encountered during the survey also 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.

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 Chicopee River bank. 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.

D. The REC’s were related to activities that occurred prior to the acquisition of the Ludlow Mill Complex by Westmass. They involve previous industrial uses of the property as a jute manufacturing facility, the illegal disposal of hazardous materials, and the existence of an up-gradient gasoline station adjacent to the Ludlow Mills complex. Previous investigation by environmental engineers, Cardno/ATC, Inc., as well as previous reports by O’Reilly, Okun & Talbot Associates retained by Westmass and the Nobis Report commissioned by the EPA, revealed numerous instances of Asbestos Containing Materials (ACM), both on the exterior and interior of buildings in the Ludlow Mills Complex. The ACM and other hazardous materials that are the subject of the site in this EPA Brownfield Cleanup Grant application is within the roofing materials, floor and ceiling tiles and window caulking in the 300s Warehouses.

7. **Brownfields Site Definition**

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

8. **Environmental Assessment Required for Cleanup Grant Applications**

   A Phase II Environmental Site Assessment dated June 2011 was conducted by Advanced Environmental Solutions, Inc. (AES) and for the US Environmental Protection Agency (EPA) Region 1. The Environmental Assessment involved on-site and records investigations as well as and 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. Nobis’ evaluation revealed numerous instances of ACM within 30 mill building roof materials including roof sealant, underlayment, roofing tar, roofing paper, rolled roofing/roll-on shingles, and modified bituminous patches. The 300s Warehouses were included in the list of buildings with ACM and other hazardous materials. 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.
9. **Enforcement or Other Actions**

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 in 2012. Westmass agreed to prevent any future releases of fuel oil. These fuel oil tanks have been removed through a Massachusetts Executive Office of Energy and Environmental Affairs (EOEEA) site remediation grant. Previous releases occurred prior to the acquisition by Westmass of the Ludlow Mills Complex and these have been identified and documented in the Phase I and Phase II ESA reports. There are currently no known enforcement actions associated with the **300s Warehouses** at the Ludlow Mills.

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

No property specific determination is required. This site in the Ludlow Mills is 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.

11. **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 an AAI-ASTM Phase I ESA meeting All Appropriate Inquiry Standards and an ASTM Phase II ESA were conducted. Westmass did not contribute to and is not liable for any contamination on any of the three sites.

1) **Bona Fide Prospective Purchaser Liability Protection**

a. **Information on the Property Acquisition**

Westmass acquired the Ludlow Mills premises from a private entity known as the Ludlow Industrial Realities, Inc. on August 24, 2011. The premise was registered land in the Massachusetts Land Court. The sale was a negotiated sale 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 Environmental Site Assessment (ESA) issued in August of 2011 was conducted by Advanced Environmental Solutions, Inc.
(AES). This document was prepared for Westmass Area Development Corporation. That document updates an AAI ASTM Phase I ESA previously prepared for the US Environmental Protection Agency (EPA) dated March, 2009. In addition, AES prepared a Phase II ESA for the Property with an issuance date of August 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 Environmental Protection Agency (EPA) Region 1 as part of an EPA Targeted Brownfield Technical Assessment.
- US EPA Region 1 has 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 in order to take advantage of the bona fide prospective purchaser, innocent landowner, or contiguous property owner provision.

c. Timing and/or Contribution toward Hazardous Substances Disposal

Westmass did not dispose of hazardous substances at the site 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 any of the three 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 phone tower, to unheated storage, to machine shops, woodworking and distribution.
The 25 tenants and associated uses which are currently leasing space at Ludlow Mills from Westmass as of the date of this application, December 1, 2021 are listed here:

Ludlow Mills - Businesses Active at the Mills, December 1, 2021

<table>
<thead>
<tr>
<th>Company</th>
<th>Business</th>
</tr>
</thead>
<tbody>
<tr>
<td>America’s Box Choice</td>
<td>Packaging Materials</td>
</tr>
<tr>
<td>CanAm Fibers</td>
<td>Paper Distribution</td>
</tr>
<tr>
<td>The Diesel Works</td>
<td>Metal Arts and Makerspace</td>
</tr>
<tr>
<td>Dustbusters</td>
<td>Duct Cleaning Service</td>
</tr>
<tr>
<td>Elite Metal Fabricators</td>
<td>Metal Fabrication</td>
</tr>
<tr>
<td>Emco Tool</td>
<td>Tool Manufacturing</td>
</tr>
<tr>
<td>Fernbro Enterprises</td>
<td>Restaurant Parking and Storage</td>
</tr>
<tr>
<td>Green Earth Roofing Solutions</td>
<td>Solar Installation</td>
</tr>
<tr>
<td>Heron Automation</td>
<td>Tool Manufacturing</td>
</tr>
<tr>
<td>Homeward Vets</td>
<td>Veterans Support Services</td>
</tr>
<tr>
<td>Iron Duke Brewing</td>
<td>Microbrewery</td>
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<tr>
<td>Molta Florist</td>
<td>Florist</td>
</tr>
<tr>
<td>New England Battery</td>
<td>Battery Sales and Servicing</td>
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<td>Outlaw Logistics</td>
<td>Logistics</td>
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<tr>
<td>PAW</td>
<td>Custom Woodworking</td>
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<tr>
<td>Potential Energy</td>
<td>Energy Efficiency</td>
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<tr>
<td>PWE Fabrications</td>
<td>Precision Metal</td>
</tr>
<tr>
<td>Roy Manufacturing</td>
<td>Precision Manufacturing</td>
</tr>
<tr>
<td>Royal Coach</td>
<td>Livery Service</td>
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<tr>
<td>Site Acquisitions, Inc.</td>
<td>Cellular Tower</td>
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<tr>
<td>SPA Brokers of America</td>
<td>Hot Tub Spa Installer</td>
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<tr>
<td>Sturbridge Flea Market</td>
<td>Antique Storage</td>
</tr>
<tr>
<td>Unitech Services Group</td>
<td>Distribution</td>
</tr>
<tr>
<td>Westnet, Inc.</td>
<td>Medical Supplies</td>
</tr>
<tr>
<td>Winn Residential</td>
<td>Storage</td>
</tr>
</tbody>
</table>

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.

• Formally notified one tenant of violations regarding regulations related to the release of hazardous substances. That tenant discontinued use of the substance in question and retained the services of an environmental engineer to evaluate the potential release of hazardous substances in its formerly leased premises.

• 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.
12. **Cleanup Authority and Oversight Structure**

A. Westmass Area Development Corporation will be responsible for oversight of the Asbestos Removal and Remediation under this EPA FY22 Grant. Westmass will enroll the Cleanup in the Massachusetts Department of Environmental Protection’s abatement process. Westmass will conduct a public bid process which while utilizing Federal Funding will for the most part following set procurement guidelines of existing Mass General Law regarding procurement (MGL 30 B) which is consistent with 40 CFR 31.36. Through this process, Westmass will solicit and select an Environmental Engineer for Project Planning and Oversight. The Environmental Engineer 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 it does not anticipate needing access to adjacent properties to conduct the cleanup activity for the site.

13. **Community Notification**

Westmass Area Development Corporation published a legal notice (Attachment B) in the Ludlow Register appeared in the newspaper’s November 10, 2021 and November 17, 2021 edition announcing that a public meeting was scheduled to be held remotely on November 23, 2021.

The Notice was also placed on Westmass’ web page (Attachment C)

The meeting created an opportunity for Westmass to present the proposed cleanup and solicit public review and comments. The presentation was made by Sean O’Donnell, Facilities Manager. The Draft Analysis of Brownfield Cleanup Alternative (ABCA) (Attachment D) summarizing the proposed cleanup proposal, applicable laws / regulations was also made available to the public for review and comments by request.

Comments received – None
Westmass response to comments – Not Applicable
Meeting Notes or Summary – Not Applicable

14. **Statutory Cost Share**

Westmass Area Development Corporation is respectfully requesting a hardship waiver of the cost share (see Attachment F).

15. **Waiver of the $500,000 Limit**

Westmass is requesting a waiver of the $500,000 funding limit (see Attachment G).