NARRATIVE INFORMATION SHEET

Applicant Identification
BRI Development, LLC, (EIN 86-3699114) registered to transact business in New Hampshire (11) and is a single-member-owned subsidiary of Bethlehem Reimagined, Inc. (11) an IRS 501(c)(3) nonprofit also registered to transact business in New Hampshire (11). The address for BRI Development, LLC is 54 Ridgewood Lane, Bethlehem, New Hampshire, 03574-4434.

Funding Requested
a) Grant type. Single Site Clean-up
b) Federal Funds Requested.
   (i) $500,000
   (ii) BRI Development, LLC is not requesting a waiver of the 20% cost-share requirement.
   (iii) BRI Development is not requesting a waiver of the $500,000 limit.

Location
Bethlehem, Grafton County, New Hampshire

Property Information
The property is known as the “Sinclair Lot”, the site of the former Sinclair Hotel. The address is Main Street, Bethlehem, NH 03574. There is no street number assigned to the property, tax map 205-020.

Contacts
The Project Director is Mr. Eric Raichle, ph.,; email,; mailing address, BRI Development, LLC, 54 Ridgewood Lane, Bethlehem, NH 03574-4434.
The President of BRI Development LLC is Mr. Paul Greenlaw, ph.,; email,; mailing address, BRI Development, LLC, 54 Ridgewood Lane, Bethlehem, NH 03574-4434.

Population
The site is located in the Bethlehem CDP, New Hampshire and has a population of 826. The Town of Bethlehem proper has a population of approximately 2,500.
### Other Factors

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community population is 10,000 or less</td>
<td>5</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.</td>
<td>N/A</td>
</tr>
<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land</td>
<td>N/A</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>7</td>
</tr>
<tr>
<td>The proposed site(s) is adjacent to a body of water (i.e., the border of the 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>N/A</td>
</tr>
<tr>
<td>The proposed site is in a federally designated flood plain.</td>
<td>N/A</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy; or any energy efficiency improvement projects.</td>
<td>6</td>
</tr>
<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>6</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>N/A</td>
</tr>
</tbody>
</table>

### Letter from State

Please see attached

### Releasing Copies of Applications

The personal phone number and email provided for the Project Director is sensitive information.
The personal phone number for the President of BRI Development, LLC is sensitive information.
EMAIL ONLY

November 12, 2021

Eric Raichle, Vice President
BRI Development, LLC
54 Ridgewood Lane
Bethlehem, NH 03574

Subject: BRI Development, LLC
FY22 Proposal for EPA Brownfields Cleanup Grant
Sinclair Hotel Site, Bethlehem, NH

State Letter of Acknowledgement and Support

Dear Mr. Raichle:

The New Hampshire Department of Environmental Services (NHDES) hereby acknowledges and expresses our support for the BRI Development, LLC’s (BRI) proposal for an EPA Brownfields Cleanup Grant for the Sinclair Hotel site located at the corner of Main Street (Route 302) and Agassiz Street (Route 142) in Bethlehem, New Hampshire.

Should your proposal be successful, NHDES will commit to providing a liaison to provide technical support, facilitate the process of reviewing and approving all cleanup related submittals to NHDES, and participate in any community outreach efforts.

We look forward to working with BRI on this important project within your community. Please contact me should you have any questions.

Sincerely,

Michael McCluskey, P.E.
Brownfields Program
Hazardous Waste Remediation Bureau
Tel: (603) 271-2183
Email: Michael.G.McCluskey@des.nh.gov

cc: Dorrie Paar, EPA New England – Region 1
Karlee Kenison, P.G., Administrator, NHDES-HWRB
Amy Doherty, P.G., State Sites Supervisor, NHDES-HWRB
Melinda Bubier, NHDES-HWRB
NARRATIVE/RANKING CRITERIA

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION
   a. Target Area and Brownfields
   i. Background and Description of Target Area

Bethlehem, New Hampshire is located in northern Grafton County, 52.8% of which is situated in the White Mountain National Forest including the Appalachian Trail. Formerly known as Lloyd Hills, from a 1774 land grant by a Loyalist Governor, the town of Bethlehem was incorporated on December 27, 1799. Today, Bethlehem has a population of approximately 2,500 residents including a Bethlehem CDP population of 826. We’re a small community.

In the 19th century, Bethlehem became a regional destination of choice among vacationers from New York and Boston for its clean air and natural beauty. There were 30 original “grand hotels” and guests included several sitting U.S. Presidents, authors and industrialists. As automobiles replaced rail as a primary form of travel, the hotels faced significant declines in attendance. Many closed, were demolished or otherwise fell into disrepair. As a typical New England town, Bethlehem also had several mills who were once major employers but now remain as vacant, underutilized properties leaving behind the remnants of the textile industry.

Our project property is the former Sinclair Hotel and is within the target area of downtown Bethlehem (EPA Region 1, Census Block Group 330099602002 with a population of 1,243). The hotel building was destroyed by fire in 1978 which similarly left behind lead, asbestos and polycyclic aromatic hydrocarbon (PAH) contamination in its soil and groundwater. For the last forty-three years, the site has been an empty, largely unused, overgrown eyesore and blight on our downtown. The Block Group has a low-income population (86th percentile in New Hampshire), high population over 64 years of age (74th percentile in New Hampshire) and a significant population with less than a high school education (75th percentile in New Hampshire). The cost to repair and maintain structures and land properly is prohibitive for many property owners. As a result, downtown Bethlehem is a mix of newer buildings, older buildings in need of substantial renovation and long-standing vacant lots, many of which are also affected by hazardous materials such as asbestos, lead, PCBs, or other contaminants.

ii. Description of the Target Area

The Sinclair Lot (former Sinclair Hotel) comprises one 4.8-acre parcel of land, which is identified as Lot 20 on Town of Bethlehem Tax Map 205. The site fronts both Main Street (US Route 302) and Agassiz Street (NH Route 142). Abutting property usage is developed, and ranges from private single-family residential, multi-family residential, assisted low-income housing, recreational and commercial uses.

Most of the ash and charred debris from the 1978 fire was left on-site and graded across the northern/northeastern area of the site, possibly used to fill in the basement. Operations at the site included a small manufactured gas plant (MGP) operation which consisted of one 250-gallon, one 500-gallon, and one 1,100-gallon underground storage tanks, which were removed from the site and disposed of in 2017. Since 2011, several Environmental Site Assessments (ESAs) have been performed at the site by different organizations, most recently by Sanborn Head & Associates Inc. of Concord, NH (Sanborn). These studies estimate 3,200 tons of lead and asbestos soil contamination on the site, including an estimated 800 tons of “grossly contaminated” soil. Sanborn performed a Phase II ESA in August 2021 to assess Recognized Environmental Conditions identified in the July 2021 Phase I ESA, as well as to address two of
the requests made by New Hampshire Department of Environmental Services (NHDES) in their January 2020 comment letter issued in response to a 2020 Remedial Action Plan. During the Phase II site investigation, soil and groundwater samples were analyzed. Findings from the Phase II ESA indicated that PAH and lead impacts appear to be limited to the surficial soils and do not appear to extend off-site to the east. X-Ray Fluorescence screening data collected as part of the Phase II ESA identified an exceedance of the NHDES Soil Remediation Standards (SRS) for lead in the topsoil layer collected located in the northeastern corner of the site. Concentrations of lead were also detected in the topsoil layers just below the SRS of 400 mg/kg. Groundwater results from newly installed monitoring wells, as well as additional groundwater samples did not indicate impacts related to historical laundry operations, cyanide from former MGP operations, or concentrations of PAHs and lead above laboratory reporting limits.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Among the key priorities identified by Bethlehem residents as part of its 2016 Master Plan are the town’s high property tax rate, health concerns from a local landfill and preserving the town’s unique character downtown. Nearly 68% of respondents from the town survey would like to see more commercial development, with an emphasis on bringing more small businesses to Main Street to accommodate residents and invite more tourism. The top survey suggestions for new businesses included restaurants, recreation, professional offices, healthcare facilities, hospitality, cottage and home industries. Respondents least wanted to see big box chain stores, fast food establishments, gambling, storage units and heavy industry. The town’s Master Plan identifies several key goals including protecting property values through new economic development, planning for future population increases, and address zoning strategies to protect the town’s scenic and natural resources.

BRI Development, LLC’s (BRI) strategy fully aligns with Bethlehem’s goals to maintain a small-town feel, to market and promote Bethlehem to visitors and investors. Our primary goal is to remediate the site for development, mitigating any and all public health concerns due to site exposure. Enticing commercial and residential development, including expansion of a senior housing complex adjoining the site will be our next area of focus. The owner of the adjoining housing complex, Housing Initiatives of New England Corp. (HINEC), has expressed interest in acquiring a portion of the property. We are planning a mixed-use, solar powered, energy efficient structure for the remaining contaminated portion of the site including ground-level retail space, residential apartments in an architectural style consistent with the former Sinclair Hotel, and parking. Ultimately, we want to ensure reuse addresses the stated interests of residents to support new business investment, providing additional tax revenue to the town, while maintaining the quality of character and charm that is unique to downtown Bethlehem. The site is not in a federally designated flood plain.

ii. Outcomes and Benefits of Reuse Strategy

As a rural, disadvantaged community, with a 9.4% poverty rate and a median household income level 72% of the state household median ($55,556/$76,768 per ACS 2019), the benefits of our reuse strategy are significant. We believe the project will benefit disadvantaged people by providing access to new business start-ups and corresponding employment opportunities that do not currently exist. We anticipate lasting new job creation in property management, retail, professional services and hospitality. The project will also help increase housing availability for individuals and families looking to work and live in the area while growing our tax base.
Public health benefits are evident. Many site abutters are elderly including those of the Hill View Apartments, an adjoining senior living complex. The public sidewalk on the northern boundary, very close to “gross contamination”, is used regularly by the public. Downgradient, the town swimming pool is nearby to the northeast and there is a large playground across Agassiz Street to the east. As mentioned above, we anticipate the opportunity to “start over” and focus on development of a new solar powered, energy efficient structure will provide long-term economic and health benefits to residents and visitors.

Our strategy is designed exclusively for the benefit of Bethlehem, its residents and visitors to the extent that any economic windfall to BRI as a result of property sale, development or net operating income would be used to fund new initiatives and programs locally consistent with economic visions of BRI and the town. BRI is committed to lead Bethlehem by attracting reinvestment in new opportunities and continued growth of the town’s economic base.

c. Strategy for Leveraging Resources

i. Resources Needed for Site Reuse

New Hampshire Department of Environmental Services (NHDES) has funded the full cost to complete the latest Phase I and Phase II Environmental Site Assessments though CERCLA 128(a) funds. Prospectively, NHDES will commit to providing a liaison to provide technical support, facilitate the process of reviewing and approving all cleanup related submittals to NHDES, and participate in any community outreach efforts.

Our relationship with Housing Initiatives of New England (HINEC) is key to our leveraging strategy. Since 1990, HINEC has been serving Maine and New Hampshire's seniors by providing affordable housing solutions and specializing in housing for independent living. This funding resource will be likely a result of purchase and sale, via lot line adjustment, for the non-contaminated area of the site.

We’re planning a robust capital campaign in early 2022 to secure donations (cash and in-kind services) from a select group of area residents who have financial resources and share our commitment to this project. We are receiving consulting advice on a pro bono basis to define and execute this element of our funding strategy. We will also initiate a crowdfunding initiative to capture community-wide financial support. Regarding subsequent reuse, these costs will be the responsibility of any prospective developer who aligns with our vision for the site.

ii. Use of Existing Infrastructure

The site is centrally located in Bethlehem’s Village District at the intersection of US Rte. 302 and NH Rte. 142. These roads and sidewalks are maintained by the Town and New Hampshire Department of Transportation (NHDOT). There are water, sewer, electricity and internet services available and can be easily reused during development and new building construction.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community’s Need for Funding

Given Bethlehem’s low-income population and relatively high cost of living with a property tax rate is historically among the highest in the state (currently $25.20 per $1,000 valuation versus $20.29/$1,000 state average), many property owners are reluctant or unwilling to make repairs or improvements only to see their tax liability increase as a result of increased valuations. The largest taxpayer in Bethlehem has pursued abatement to reduce their tax liability and there are several private schools, churches, non-profit organizations and low-income housing units that...
pay relatively little or no property taxes to the town. Bethlehem’s annual $3M municipal budget and $5M school budget puts significant pressure on property owners to maintain reasonable municipal service levels and some taxpayers find themselves in an ongoing state of arrears. There are also examples of owners simply “walking away” from their properties, leaving the town to take possession and auction the property to satisfy outstanding liens.

In the case of our project, the scale of clean-up cost was far too high for the previous site owner and financially prohibitive for prospective commercial buyers (i.e. Dollar General), leading the property to remain vacant and the owner retaining tax liability. As a result, BRI purchased the property, with its modest financial resources, at a substantial discount. We are grateful for the previous owners’ generosity and vision to return the property to one that is marketable.

The clean-up grant and cost share will be used exclusively for site remediation. Revitalization of this important location will fully support Bethlehem’s Master Plan and expand opportunities for more positive socio-economic outcomes. Otherwise, the site will continue to languish as an environmental hazard to residents and public as it has for the past two generations.

**ii. Threats to Sensitive Populations**

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

Most recent available data provided by the EPA EJSCREEN report, show 22% of Bethlehem’s resident population is over age 64, compared to 17% in NH and 15% nationally. Bethlehem’s low-income population is 38%, compared to 20% across the state. Bethlehem also has a high Lead Paint Indicator (pre-1960s housing) in the 75th percentile for New Hampshire and 73rd percentile nationally.

In 2009, the New Hampshire Department of Health and Human Services (DHHS) began an investigation of a suspected cancer cluster in Bethlehem in response to community concerns. The results of their analysis, discussed further in the following section, show a higher-than-expected incidence of five different cancer types in Bethlehem and eight surrounding towns. Although their conclusions did not draw a correlation between cancer incidence and environmental hazards, their recommendation suggested “members of the community should keep themselves informed about toxic substances, human exposure, and public health hazards associated with the environment. As an important public health measure, everyone should also follow prescribed cancer prevention and screening guidelines including regular screenings for breast, cervical and colon cancer”.

The potential for site-related lead, asbestos and PAH exposure will be addressed directly by this grant leading to positive health outcomes for our sensitive populations. Given the site’s downtown location, centrally in Bethlehem, adjacent to senior housing and proximate to the town pool and playground where our youth congregate, our redevelopment will be within walking distance to a number of downtown services, stores and activities also improving the health and welfare of our target communities.

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

It is our expectation that this grant and subsequent reuse strategy will help mitigate the threat of certain cancers that have been identified in Bethlehem and surrounding towns. Bethlehem’s EJ Index for Air Toxics Cancer Risk ranks in the 85th percentile in the state and 66th percentile in EPA Region 1. Our EJ Index for NATA Diesel PM is in the 90th percentile compared to 74th percentile in EPA Region 1. Our EJ Respiratory Hazard Index is in the 86th percentile state-wide and 68th percentile in EPA Region 1.
The results of the December 14, 2009 Cancer Incidence and Cancer Mortality: Bethlehem NH and Surrounding Towns Follow-Up Analysis and Medical Records Review conducted by the NH DHHS identified 170 cases of primary malignant cancer occurring from 1991 to 2005. A preliminary comparative analysis identified female breast cancer and pancreatic cancer as having elevated incidence in Bethlehem. The most commonly diagnosed cancers for adult males are prostate cancer, lung and bronchus cancer, and colorectal cancer. For women, the most common cancer types diagnosed are breast, lung and bronchus, and colorectal. These accounted for 53% of the 170 cases diagnosed in residents of Bethlehem. Remediation of the site will represent a very visible, positive step toward addressing the reduction of cancer incidences locally. Being within walking distance to a number of downtown services, stores and activities will also lead to healthier lifestyles that, in turn, lead to improved health and reduced disease.

3) Promoting Environmental Justice
At its core, risk-free public access to previously contaminated sites is not only worth promoting, but celebrating! Our environmental justice approach will be one of transparency, inclusiveness and recognition.

We rely on technical expertise to support scientific and engineering transparency to the public. It’s our intent to make sure there are “no surprises” and ensure residents are informed of “what’s happening” and “what’s next” through our website, regular town meeting updates, ad hoc individual and group discussion, public meetings and door to door. We will seek support and guidance from Bethlehem residents, government officials, business community and schools. Our approach to transparency will be key to opening lines of communication to all interested stakeholders. The good people of Bethlehem are community active. We commit to educate, collaborate and above all, be great listeners to those who want to improve soil and water issues, promote economic growth and alleviate local disinvestment.

With ongoing community support we will track, and at times, together celebrate our mutual progress. Achievements, no matter how modest, will be recognized. Disappointing news will be shared as well. Regardless, progress will be measured by achievement of well-defined project goals and articulated in a way where we can all agree environmental justice is served through equitable distribution of environmental benefits.

b. Community Engagement
i. Project Involvement/ ii. Project Roles

<table>
<thead>
<tr>
<th>Name of Organization/Entity/Group</th>
<th>Point of Contact (name, email, phone)</th>
<th>Specific involvement in the project or assistance provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>New Hampshire Department of Environmental Services</td>
<td>Melinda Bubier; <a href="mailto:Melinda.s.bubier@des.nh.gov">Melinda.s.bubier@des.nh.gov</a>; 603-271-1169</td>
<td>Regulator; project overview, technical review; CERCLA 128(a) assessment funding</td>
</tr>
<tr>
<td>North Country Council Regional Planning and Economic Development District</td>
<td>Michelle Moren-Grey; <a href="mailto:mmoren@nccouncil.org">mmoren@nccouncil.org</a>; 603-444-6303</td>
<td>Brownfield's advisor and technical assistance</td>
</tr>
<tr>
<td>UConn/TAB</td>
<td>Nefeli Bompoti, PhD; <a href="mailto:nefeli.bompoti@uconn.edu">nefeli.bompoti@uconn.edu</a>; 860-486-0611</td>
<td>Technical assistance to this clean-up grant application</td>
</tr>
</tbody>
</table>
iii. Incorporating Community Input

The Bethlehem community will have active, open, real-time input to BRI throughout the scope of this project. All stakeholders will have direct access to BRI’s Board members for all project activities. Certain stakeholders may receive preliminary communications directly from BRI before releasing to the general public. We will also solicit real-time community feedback to drive project success including opening all communication channels to the public and engage in dialogue to inform, educate and listen. Upon the achievement of certain milestones such as ABCA finalization, community charrettes, and timelines, we will communicate publicly through press releases, open town meetings (including Zoom meetings due to COVID-19), and media channels. BRI’s website (bethlehemreimagined.org), will provide progress updates against project goals, providing links to EPA and NHDES websites and establishing a ‘Frequently Asked Questions’ page that is reviewed and updated weekly. A video recording of our November 10th public hearing and the opportunity to submit emails to BRI through our website is currently available.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Sanborn Head recommends excavation of lead-impacted soil at concentrations greater than 4,000 mg/kg, implementation of a clean soil cover system and an Activity and Use Restriction (AUR) for the site. This approach would remove lead-impacted soil identified during previous investigations considered ‘grossly contaminated’, consolidate and cap the remaining lead and PAH-impacted soils that exceed the Soil Remediation Standards (SRS) and asbestos-impacted soils detected at greater than 1% by volume, as well as implement an AUR for the portion of the site where exceedances of the SRS remain.

Prior to excavation, a chemical additive (EnviroBlend® CS) would be directly applied to the ‘grossly contaminated’ soils to bind the lead particles making them less likely to leach, so that they could be handled as non-hazardous waste for off-site disposal. A treatability study and additional sampling is also required to further delineate the extent of the grossly contaminated soils. Assuming an approximate 3-foot-deep excavation in this area, the amount of soil to be stabilized and removed is approximately 800 tons (550 CY) and transported as non-hazardous waste to the Casella Waste Services facility in Coventry, Vermont for disposal.
Where areas of impacted soil remaining across the Site at concentrations above the SRS, but less than 4,000 mg/kg, this recommendation includes placing a geotextile marker fabric to separate the contaminated soil remaining in place and importing approximately 2,250 CY of clean, granular backfill and 750 CY of loam to provide a 2-foot-thick cap over an approximately 40,000 sq. ft area where exceedances of the NHDES SRS for lead and PAHs have been observed in the surficial and shallow soils. An additional 550 CY of granular fill has also been included to backfill the excavation in the former building foundation. Prior to placement of the soil cap, additional areas where lead impacts have been identified at concentrations above the SRS of 400 mg/kg will be excavated and consolidated within the former building footprint prior to capping.

This project is shovel ready and a draft Analysis of Brownfield Clean-up Alternatives (ABCA) is prepared. If awarded the grant, pre-award funds will be requested to finalize documents so that cleanup activities can begin promptly in July 2022 with completion expected October 2023.

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

The following tasks are anticipated:

<table>
<thead>
<tr>
<th>Task Activity: 1. Cooperative Agreement Oversight</th>
<th>Discussion of EPA-funded tasks/activities: N/A. Discussion of non-EPA-grant resources:</th>
</tr>
</thead>
<tbody>
<tr>
<td>Project Implementation: The following non-EPA-funded activities will ensure the grant is effectively implemented and cleanup completed in a timely manner</td>
<td></td>
</tr>
<tr>
<td>a. Competitively Procure Qualified Environmental Professional (QEP)</td>
<td></td>
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<tr>
<td>b. Quarterly ACRES Reporting and Annual MBE/WBE Reports</td>
<td></td>
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<tr>
<td>c. Attend Brownfields workshops and seminars</td>
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<tr>
<td>d. Ongoing personal and financial management and coordination with key stakeholders</td>
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<tr>
<td>e. Enroll site in NHDES’ Brownfield’s Covenant Not to Sue Program (VCP)</td>
<td></td>
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<tr>
<td>f. Finalize CRP and establish information repository</td>
<td></td>
</tr>
<tr>
<td>Anticipated Project Schedule: Starting April 2022 through project completion December 2023</td>
<td></td>
</tr>
<tr>
<td>Task/Activity Lead(s): BRI and QEP</td>
<td></td>
</tr>
<tr>
<td>Outputs: EPA Quarterly Reports, MBE/WBE Reports, RFQ</td>
<td></td>
</tr>
</tbody>
</table>

| Task Activity: 2. Community Involvement | |
| Project Implementation: The following non-EPA-funded activities will be performed to continually involve the public and our project partners in the cleanup of the site: | |
| a. Host public meetings for draft ABCA and finalize ABCA | |
| b. Host public charrettes for community input on final design | |
| c. Provide updates at public Board of Selectman’s meetings and Town Hall meetings | |
| d. Notify and update community of cleanup schedules | |
| e. Prepare informational materials and surveys to help ensure community engagement | |
| Anticipated Project Schedule: July 2022 ongoing to December 2023 | |
| Task/Activity Lead(s): BRI and QEP | |
| Outputs: CRP, ABCA, public notices, survey results, meeting minutes, handouts, news articles, mailings, revised design concepts | |

| Task Activity: 3. Cleanup Activities | |
| Project Implementation: The following EPA-funded and non-EPA-funded activities will be performed to cleanup and prepare the site for development: | |
| a. Prepare Remedial Action Plan (RAP) and receive NHDES Notice of Approved Remedial Action Plan (NARAP) | |
| b. Prepare Site-Specific Quality Assurance Project Plan (SSQAPP) | |
c. Finalize Bid Specifications

d. Remediation and removal of contaminated soil above 4,000 mg/kg

e. Consolidation/re-grading of soils meeting final design

f. Site restoration and installation of engineered barrier systems

Anticipated Project Schedule: July 1, 2022 to October 15, 2023

Task/Activity Lead(s): QEP

Outputs: NARAP, SSQAPP, Bid Specifications, Daily Reports, Certified Payrolls, Davis-Bacon Interviews, Disposal Documentation

**Task Activity: 4. Coordination and Final Reporting**

Project Implementation: The following non-EPA-funded activities (20% match) will be performed following completion of cleanup activities:

a. Coordinate with regulatory agencies

b. Submit Remediation Summary Report for NHDES Certificate of Completion

c. Prepare and implement institutional controls (i.e., deed covenant)

Anticipated Project Schedule: October 15, 2023 to March 31, 2024

Task/Activity Lead(s): QEP

Outputs: Remediation Summary Report, Certificate of Completion from NHDES, Covenants

c. Cost Estimates

The proposed tasks and associated budgets are included in the following summary table:

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Project Tasks ($)</th>
</tr>
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<tbody>
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<td></td>
<td>Coop. Agreement Oversight</td>
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<tr>
<td>Personnel</td>
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<td>Fringe Benefits</td>
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<td>Travel</td>
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<td>Contractual</td>
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<td>Other 5% total project cost in-kind match</td>
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<td>Total Direct Costs</td>
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<td>Indirect Costs</td>
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<tr>
<td>Total Federal Funding</td>
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<tr>
<td>Cost Share</td>
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</tr>
<tr>
<td>Total Budget</td>
<td>$10,000</td>
</tr>
</tbody>
</table>

**Task I: Cooperative Agreement Oversight:** This task will include $10,000 cost-share for programmatic management of the grant including procuring a QEP, quarterly reports, ACRES updates, and MBE/WBE reporting. It is estimated BRI will provide grant management oversight and QEP coordination as an in-kind service at an estimated amount of $10,000 (200 hours at $50/hr.).

**Task II: Community Involvement:** It is estimated that $18,000 will be necessary to facilitate public, and community volunteer/partner meetings. This includes a $10,000 cost-share from BRI, (200 hours at $50/hr.), and $5,000 QEP time (100 hours x $50/hr.) plus $3,000 marketing supplies to finalize the ABCA and prepare the Community Relations Plan, QAPP and VCP.
documents (i.e. NHDES Brownfields Covenant Not To Sue application), community outreach, and participation at public meetings.

**Task III: Cleanup Activities:** Preliminary estimates indicate approximately $557,000 will be necessary for the abatement, excavation and disposal of hazardous materials, and soil cap installation. We have allocated $185,606 contractual for excavation and disposal services, $191,716 for soil capping services, $82,678 for scope and bid contingencies, and $97,000 for engineering services. BRI will contribute a cost-share of $57,000 of the total direct expenditure.

**Task IV: Coordination and Final Reporting:** BRI will coordinate with the QEP on all required communications reporting with the EPA and NHDES including a remediation summary report. We estimate BRI time at $10,000 (200 hours at $50 per hour) cost share and $5,000 QEP time (100 hours x $50/hr.) to complete all project communications and reporting.

d. Measuring Environmental Results
If awarded the grant, the BRI will prepare a Cooperative Agreement Work Plan that will outline the overall project schedule, project budget, identify various work tasks, benchmarks, and milestones that will be tracked and measured during grant implementation. A QEP will be procured and be responsible for ensuring that all work is compliant with State and Federal guidelines including Davis-Bacon compliance. The BRI and QEP, and any cleanup contractors will be in constant contact throughout the project to ensure the project remains on schedule to achieve the desired outcomes. The mechanism for tracking, measuring, and evaluating progress and achieving program outcomes will be through our quarterly EPA reports and regular updates in the EPA ACRES database. Connecting outputs to our work plan will provide a link to the results of grant funding within EPA’s strategic plan as well as demonstrate to Congress the tangible results of a successful Brownfields grant program.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure
BRI is a community-based, economic development group with federal grant management experience. The BRI team is staffed by members of the Board, collaborating on all key project decisions, and structured as follows:

ii. Description of Key Staff
President (Paul Greenlaw) has leadership management for all BRI’s business activities. Paul is a life-long resident of Bethlehem and a successful small business owner regionally.

Vice President (Eric Raichle) reports to the President and executes all day-to-day operational and financial activities agreed to by the Board including planning and executing against project goals and financial reporting. Eric has over thirty years of management experience in manufacturing, management consulting and biotechnology industries.

Board Member (Michelle Moren-Grey) works closely with the Vice President as a key operational and technical expert. Michelle is Executive Director of North Country Council Regional Planning Commission and Economic Development District serving 50 communities in New Hampshire working in an advisory role to promote coordinated planning, orderly growth, efficient land use, transportation access, and environmental protection, including Brownfield’s.

Board Member (Leslie Apple) works closely with the President and Vice President on all financial/legal matters. Les is an internationally recognized attorney and twenty-five-year partner of a prestigious law firm practicing primarily in the areas of mergers and acquisitions, investment advisor and broker-dealer compliance, banking and finance.
iii. Acquiring Additional Resources
In the case where additional expertise is required, BRI utilizes a competitive procurement process for obtaining needed expertise. This consists of a proposal review, receiving proposals from multiple firms, evaluating the firms based on established criteria, and awarding the contract to the firm that best meets those criteria.

b. Past Performance and Accomplishments
4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Nonfederal Assistance Agreements; (1) Purpose and Accomplishments
BRI was awarded a $25,000 Rural Business Development Grant from the United States Department of Agriculture (10.351 RBDG) to conduct a feasibility study and determine whether a co-working business in Bethlehem was viable and could improve the quality of our business community. The COVID pandemic nearly stopped the study, however we received extension approval from the USDA and pivoted the study design focusing on co-working “systems” vs. co-working “spaces” to better understand co-working in a post-pandemic world. We shared study results with the Women’s Rural Entrepreneurial Network (WREN). Within months, WREN repurposed a portion of their commercial space into desks and offices and now supports professionals working and learning remotely.

(2) Compliance with Grant Requirements
BRI operated in full compliance with all grant requirements. The study was completed in approximately eighteen months with no issues. Consultant invoices were paid on time and expense reimbursements from the USDA to BRI were promptly approved and paid.
Threshold Criteria for Cleanup Grants

1. Applicant Eligibility
BRI Development, LLC is a New Hampshire limited liability corporation whose sole member is an IRS 501(c)(3) nonprofit and New Hampshire nonprofit organization, Bethlehem Reimagined, Inc.

2. Previously Awarded Cleanup Grants
The proposed site has not received funding from a previously awarded EPA Brownfield’s Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds
BRI Development, LLC does not have an open EPA Brownfield’s Multipurpose Grant.

4. Site Ownership
BRI Development, LLC has owned (by fee simple title) the proposed site since November 2, 2021, and is the sole owner with no outstanding mortgages or liens.

5. Basic Site Information
The proposed site is known as the “Sinclair Lot” on the corner of Main Street (US Rte. 302) and Agassiz Street (NH Rte. 142) in Bethlehem, New Hampshire 03574. There is no assigned street number for the proposed site. The proposed site is owned by BRI Development, LLC, 54 Ridgewood Lane, Bethlehem, NH 03574-4434.

6. Status and History of Contamination at the Site
The proposed site is currently a 4.8-acre open lot. Previously, the Sinclair Hotel operated on the site from 1857 to 1974. The hotel building was destroyed by fire in 1978 which similarly left behind lead, asbestos and polycyclic aromatic hydrocarbon (PAH) contamination in its soil and groundwater including an estimated 800 tons (550 cubic yards) of “grossly contaminated” soil. Environmental concerns include contamination exposure to the general public and sensitive populations including senior-living apartments adjacent to the proposed site, and nearby town playground and swimming pool where families and children congregate.

7. Brownfields Site Definition
The proposed site meets the Brownfield’s Site Definition as real property, of which redevelopment is complicated by the presence of a hazardous substance, pollutant, or contaminant. To date, there is no evidence the proposed site is contaminated by controlled substances, petroleum or petroleum products and is not mine-scarred land.
BRI Development LLC affirms that the site is: a) not listed or proposed for listing on the National Priorities List; b) 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; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications
Sanborn Head & Associates, Inc. of Concord, NH conducted a Phase II Environmental Site Assessment (ESA) in August 2021 on behalf of New Hampshire Department of Environmental Services (NHDES) to assess Recognized Environmental Conditions identified in a July 2021 Phase I ESA and address additional requests by NHDES.

9. Enforcement or Other Actions
There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfield’s Grant funding is sought.

10. Sites Requiring a Property-Specific Determination
The proposed site does not require a “Property-Specific Determination” from the EPA.

11. Threshold Criteria Related to CERCLA/Petroleum Liability
   a. Property Ownership Eligibility – Hazardous Substance Sites
BRI Development LLC affirms it meets the requirements for asserting an affirmative defense to CERCLA liability under provisions of the Bona Fide Purchaser Exemption.
   iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY
      (1) Bona Fide Prospective Purchaser Liability Protection
         (a) Information on the Property Acquisition, BRI Development LLC voluntarily purchased the proposed site from Sinclair Village LLC, Mr. George Moore, Manager (previous owner), via private, negotiated sale November 2, 2021, fee simple title with no outstanding mortgages or liens. Other than a Purchase Option Agreement for the proposed site executed March 10, 2021, between BRI Development LLC and Sinclair Village, LLC, Mr. George Moore, Manager, BRI Development has no previous or current familial, contractual, corporate, or financial relationship or affiliation with any other property owner or operator of the proposed site.
         (b) Pre-Purchase Inquiry, BRI Development LLC completed All Appropriate Inquires as a prospective purchaser August 18, 2021 conducting due diligence prior to acquiring the proposed site and supporting the initiation of a Phase I ESA and subsequent Phase II ESA by Sanborn Head & Associates, Inc. on behalf of New Hampshire Department of Environmental Services.
           (i) A summary of all previous assessments for the proposed site are as follows:
              - Phase I ESA (September 2011), ACT Associates, Inc. for Dollar General Stores
              - Limited Phase II ESA (October 2011), ACT Associates, Inc., for Dollar General Stores
              - Phase I ESA (December 2016), Aries Engineering, Inc., for NHDES
              - Phase II ESA (May 2017), Aries Engineering, Inc., for NHDES
              - UST Removal Observations (June 2017), Aries Engineering, Inc., for NHDES
              - NHDES Response to UST Removal Observations (November 2017), NHDES to Aries Engineering, Inc. and Sinclair Village, LLC, Mr. George Moore, Manager.
              - Site Investigation (April 2018), Aries Engineering, Inc., for NHDES
              - Remedial Action Plan (June 2019 and revised July 2020), Aries Engineering, Inc., for NHDES
              - 2019-2020 Biennial Summary Report (December 2020), Stonecipher & Clark Environmental Solutions, LLC for NHDES
              - Phase I ESA (July 2021), Sanborn Head & Associates, Inc. for NHDES
              - Phase II ESA (August 2021), Sanborn Head & Associates, Inc. for NHDES
         (ii) Sanborn Head & Associates, Inc. (Sanborn) performed the Phase I ESA for NHDES on behalf of BRI Development, LLC as a bona fide prospective purchaser. Sanborn is a
large, environmental engineering firm located in Concord, New Hampshire specializing in Brownfield’s redevelopment services. The Project Director is Jennifer Sanborn. She is a professional engineer with a degree in civil engineering from the University of New Hampshire and a master’s degree in engineering from the University of California, Berkeley.

(iii) The Phase I ESA performed by Sanborn was completed in July 2021. BRI Development, LLC purchased the proposed site within 180 days of this Phase I ESA on November 2, 2021.

(c) Timing and/or Contribution Toward Hazardous Substances Disposal. BRI Development, LLC affirms all disposal of hazardous substances at the site occurred before acquisition of the property and did not contribute to any release of hazardous substances at the site. BRI Development, LLC also affirms it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses. Since acquiring the proposed site November 2, 2021, there have been no uses on the property by BRI Development or any other persons or entities.

(e) Continuing Obligations.

(i) At the time of purchase, the proposed site was largely impassable due to significant overgrowth and forestation. BRI has posted ‘no trespassing’ signs in the area of known contamination to help prevent public exposure.

(ii) With regard to stopping continuous releases, the latest test results by Sanborn show no contamination levels above state limits in the groundwater. BRI is also preventing any property uses that could potentially release contaminated soil into the air.

(iii) BRI is committed to regular groundwater testing and use restrictions to identify and/or prevent future release of contaminated material.

BRI affirms its commitment to comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls; assist and cooperate with those performing the cleanup and provide access to the property; comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.

12. Cleanup Authority and Oversight Structure

(a) BRI Development plans to enroll in the New Hampshire Department of Environmental Service Brownfields Covenant Not to Sue program (i.e. the state’s VCP) and contract with a QEP to oversee/conduct the cleanup, and does not expect the need to acquire additional technical expertise.

(b) The proposed site does not require access from adjacent or neighboring properties.

13. Community Notification

BRI Development provided the community with notice of its intent to apply for an EPA Brownfields Cleanup Grant and allowed the community an opportunity to comment on the draft application and Analysis of Brownfields Cleanup Alternative in accordance with the 14-day application requirement. Please see attached community notification documentation and the ABCA.

14. Statutory Cost Share
(a) BRI Development LLC will meet the 20% statutory cost share equal to $100,000 in the following manner:

- $35,000 loan commitment from the New Hampshire Community Loan Fund (letter attached)
- $30,000 administrative services limited to 5% of total $600,000 project cost
- $20,000 cash from BRI Development, LLC
- $15,000 secured line of credit from Mascoma Bank Corporation (documentation attached)

(b) BRI Development LLC is not requesting a hardship waiver.

15. Waiver of the $500,000 Limit

Although BRI Development is addressing one proposed Brownfield’s site, it does not request a waiver of the $500,000 limit to $650,000.

16. Named Contractors and Subrecipients

BRI Development is not prepared to name procurement contractors (including consultants) or subrecipients in applications for Brownfields grant funding at this time.