Narrative Information Sheet
NWBRV USEPA FY2022 Brownfields Cleanup Grant Application

1. **Applicant Identification:** Woonsocket Neighborhood Development Corporation d/b/a NeighborWorks Blackstone River Valley (NWBRV)
   719 Front Street, Suite 103
   Woonsocket, Rhode Island 02895

2. **Funding Requested:**
   a. **Grant Type:** Single Site Cleanup
   b. **Federal Funds Requested:**
      i. Requested Amount: $650,000
      ii. A cost share waiver is not requested
      iii. A waiver of the $500,000 limit is requested

3. **Location:**
   a) **City:** North Smithfield
   b) **County:** Providence County
   c) **State:** Rhode Island

4. **Property Information:** Andrews Mill (Lot 29)
   761 Great Road
   North Smithfield, Rhode Island 02896

5. **Contacts:**
   a. **Project Director:** Bill Lewis, Co-Director of Real Estate Development
      NeighborWorks Blackstone River Valley
      719 Front Street, Suite 103
      Woonsocket, Rhode Island 02895
      Phone: (401) 762-0993
      Email: blewis@nwbrv.org

   b. **Chief Executive:** Joseph Garlick, Jr., Executive Director
      NeighborWorks Blackstone River Valley
      719 Front Street, Suite 103
      Woonsocket, Rhode Island 02895
      Phone: (401) 762-0993
      Email: mjgatlick@nwbrv.org
6. **Population:** General Population of the Town of North Smithfield, RI: 12,582

7. **Other Factors:**

<table>
<thead>
<tr>
<th>Other Factors</th>
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<tr>
<td>Community population is 10,000 or less.</td>
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<td>The applicant is, or will assist, a federally recognized Indian tribe or</td>
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<td>United States territory</td>
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<td>The proposed brownfield site(s) is impacted by mine-scarred land.</td>
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<td>Secured firm leveraging commitment ties directly to the project and will</td>
<td>3 and Attachment to Narrative</td>
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<td>facilitate completion of the project/reuse; secured resource is identified</td>
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<td>in the Narrative and substantiated in the attached documentation.</td>
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<td>The proposed site(s) is adjacent to a body of water (i.e., the border of</td>
<td>1, 2, 3, 4, &amp; 5</td>
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<td>the site(s) is contiguous or partially contiguous to the body of water, or</td>
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<td>would be contiguous or partially contiguous with a body of water but</td>
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<td>for a street, road, or other public thoroughfare separating them).</td>
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<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>1</td>
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<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy</td>
<td>2, 6</td>
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<td>from wind, solar, or geothermal energy.</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency</td>
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<td>measures.</td>
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<td>The target area(s) is located with a community in which a coal-fired</td>
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<td>power plant has recently closed (2011 or later) or is closing.</td>
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8. **Letter from the State or Tribal Environmental Authority:** An acknowledgement letter from the Rhode Island Department of Environmental Management (RIDEM) is attached.

9. **Releasing Copies of Applications:** Not applicable

**Attachments:** RIDEM Acknowledgement Letter
October 15, 2021

Bill Lewis, Co-Director of Real Estate Development
NeighborWorks Blackstone River Valley
719 Front Street, Suite 103
Woonsocket, RI 02895

RE: EPA FY2022 Brownfields Cleanup Grant

Dear Mr. Lewis:

The Rhode Island Department of Environmental Management (RIDEM) is pleased to provide this letter in acknowledgment of your proposal to the United States Environmental Protection Agency (EPA) for a FY2022 Brownfields Cleanup Grant for Andrews Mill, located at 761 Great Road, North Smithfield, Rhode Island (Plat Map 5 / Lot 29). As you know, the RIDEM strongly promotes the investigation, cleanup, redevelopment, and productive reuse of Brownfield properties. RIDEM recognizes the increased burdens and challenges that communities face and the importance of transforming Brownfield sites in the Town of North Smithfield into valuable and productive properties.

RIDEM hopes that EPA will look favorably on your proposal. RIDEM is aware of the environmental assessment work that NeighborWorks Blackstone River Valley (NeighborWorks) has performed at 761 Great Road, and this Brownfields Cleanup Grant will be used for remediation of the property to fully remediate the deleterious environmental condition at the Site. With this Cleanup Grant funding, the proposed cleanup project at this property will be able to more adequately improve the environmental conditions present so that the potential exposure to contaminated media will be remediated. Remediation and redevelopment of this property will help to revitalize the area and bring this property, and potentially other properties in the area, back to beneficial reuse, generating jobs and revenue.

Using the partnerships created and the lessons learned from our own efforts under Rhode Island’s Targeted Brownfield Assessment (TBA) Grant program, we are as anxious as you are to see this Brownfield project become a success. RIDEM has actively been working with NeighborWorks and we strongly encourage NeighborWorks to continue to schedule meetings with RIDEM on all future phases of this project so that we can provide assistance to help ensure that the project will proceed in compliance with the RIDEM Rules and Regulations for the Investigation and Remediation of Hazardous Materials Releases.

Please attach this letter to your proposal so EPA will give it favorable consideration.

Sincerely,

Terrence Gray, P.E.
Acting Director

Cc: Kelly Owens, RIDEM/LRSM
Rachel Simpson, RIDEM/LRSM
Jessica Dominguez, EPA Region 1
1. Project Area Description and Plans for Revitalization

1.a.i. Background and Description of Target Area:

The target area is located on Great Road in the historic Branch Village of North Smithfield, RI - census tract 44007012801 - part of Providence County. The specific site for cleanup is located within immediate access to services and amenities along Great Road, and the site is also located approximately 1.5 miles from the commercial center of North Smithfield. Collectively, the surrounding area provides access to services, restaurants, urgent care, medical offices, a pharmacy, various shops, a large food store, business and auto services, a host of restaurants and convenience stores. In addition, the location is very convenient to additional amenities in downtown Woonsocket and enjoys easy access to Route 146, a multilane highway facilitating that runs to both Providence and Worcester, MA.

As for the history of this area, the first half of the 19th century provided a formative period of growth for the Town of North Smithfield. Industry, along with social, commercial, religious and educational institutions formed their way into the very fiber of the community. Although, the initial few decades of the century were in essence a carry-over of the 18th century economy and culture, where the establishment of textile mills and resultant area growth of villages and populations spurred development. By the mid-19th century the mill villages, still prospering, started to slowly give way to the decline of agriculture, and mill life itself, by the end of the decade.

As can be imagined, these rich cultural resources promote a strong variety of historic districts with accompanying structures and sites. As history continued through the noted 18th & 19th century, rural based towns became settlements for industrial developments that brought with it residential and another commercial development. But it is these very historic districts that promote North Smithfield’s great legacy. Slater’s Village – one of the oldest mill villages in America, along with Forestdale and Union Village highlight these communities. In addition, several other settlements have their counterpart in several rural town districts. Most notably the Grange Road district and Smithfield Road which was once part of the Great Road connecting Providence and Worcester. Other notable historic sites include homes, churches, farms, taverns, bridges, schools, roads, family cemeteries, mills, quarries, cemeteries, miles of stone walls and an Indian battleground.

Understanding the future development of North Smithfield requires an appreciation and respect of its cultural resources and beginnings. North Smithfield Branch Village Revitalization, in partnership with NWBRV hold this rich culture at the forefront of developing the Andrews Mill Complex.

1.a.ii. Description of the Brownfield Site:

From the late 18th to the early-20th century industrial enterprises harnessed the Branch River to power manufacturing on this site. As early as 1795 the Branch River powered the forge and scythe works of Elisha Bartlett (1742-1804). By the early 19th century, a small mill spun cotton yarn beside the scythe works. 1858 the Blackstone Manufacturing Company, a producer of both cotton and woolen products, purchased the property. It was in service until 1870, when it leased the site to James Pitts (1811-1895) and Robert Aldrich for the manufacture of shoddy and flock. In 1918 the property was acquired by the Andrews Mill Company. The plant served from 1918 to 1924 as a weaving and finishing plant for worsted cloth. 1936 the Uxbridge Worsted Company occupied the property and would be the site’s final textile use through 1954. In 1955 the property was leased to the Tupperware Corporation, a plastic manufacturing company. The site was used as a research and office facilities. Tupperware operated on the Site until the early to mid-1990s, when the Site was sold to Atlantic Thermo Plastics (ATP) for continued plastic manufacturing use.

The Andrews Mill listed with the National Registry of Historic properties by the RI Historic and Heritage Preservation Commission is located at 761 Great Rd., North Smithfield, RI. The site is a vacant former industrial property, which has federally designated floodplains. The site consists of approximately 32.4 acres and abuts the Branch River along its eastern property line and Great Road along its southern property line and has a long history of industrial use and is developed with a former manufacturing building, office building, machine shop, wastewater treatment plant, other ancillary buildings, landscaped areas, paved driveways, and parking areas.

There are seven structures on the site. The main building (historic manufacturing building) is 55,000 SF, two-story office building is 3,000 SF, machine shop building (historic) is 3,000 SF, two wood-framed wastewater treatment plant buildings totaling 800 SF, and two pump houses. Each building was inspected for hazardous building materials, e.g., asbestos, lead and other miscellaneous hazardous materials. Out of the seven buildings, four have Asbestos-Containing Materials (ACM), four have Lead-Based Paint (LBP), five have Mercury Containing Components, and two have suspected Polychlorinated Biphenyls (PCBs) and other miscellaneous hazardous materials.

After the acquisition, NWBRV have secured the site and its buildings with multiple barriers being installed at the site’s entrances to prevent vehicles from trespassing onto the site and all broken entry ways into the buildings were boarded up. In addition, due to the levels of ACM inside of the buildings warning signs of asbestos were posted around the site and as an
added layer of security NWBRV met with the North Smithfield’s Police Dept. to request additional patrolling. To date there have been no incidents to report.

The results of previous environmental identified that various hazardous building materials were prevalent throughout the site buildings, including asbestos-containing materials (ACM), lead-based paint (LBP), components potentially containing polychlorinated biphenyls (PCBs) or mercury, and other universal wastes. Preliminary cost estimates were also prepared for the abatement and cleanup of the hazardous building materials. Specifically, extensive quantities of building materials containing asbestos at concentrations greater than 1% were identified in building components throughout the former Andrews Mill buildings including over 13,950 square feet of pipe fitting and insulation debris; 560 pipe fittings insulation; and 10,680 square feet of floor tile and mastic. An inspection for the presence of LBP using a direct-reading x-ray fluorescence (XRF) analyzer also identified several painted surfaces throughout the buildings to contain elevated levels of lead, greater than 1.0 mg/cm², which are considered “lead-based” according to the U.S. Housing and Urban Development Lead-Based Paint Guidelines. In accordance with local, state, and federal laws and regulations, these hazardous building materials are required to be abated, removed, and properly disposed of off-site, prior to or during site renovation and redevelopment activities.

1.b.i. Reuse Strategy and Alignment with Revitalization Plans:

NWBRV is committed to preserving the integrity and quality of the Andrews Mill historic building; their projected redevelopment is to take this century-old, deteriorating building and transform it into a fresh, beautiful, self-sustaining, and much-needed affordable housing complex for the town’s disadvantaged populations. The abatement and cleanup of the hazardous building material and the redevelopment of the Site is in line with the goals of the North Smithfield Branch Village Revitalization Plans to create a ‘Mixed-Use Development’ with affordable apartments and live-work studio space. In fact, the town originally approached NWBRV about acquiring the site and redeveloping it. In addition, there have been discussions with the town to expand the town’s library to the site. If approved the library would be located at the front of the building off of Great Road. The project furthers several community goals highlighted in both the Branch Village Revitalization Plans and the North Smithfield Comprehensive Plan including economic development, affordable housing development, efficient and creative use of land, mixed-use development, historic preservation, adaptive reuse of the former Andrews Mill also known as the ATP site, conserving open spaces, incorporating strategies for a walkable community, increasing access to the river by creating a river walk along the Branch River, preserving the architectural character that is original to the area, and plans for innovative land use techniques including low impact development. All of which are in alignment with the town’s revitalization efforts.

The site redevelopment will not only provide the Branch Village benefits listed above but will help the Town in meeting its 10% affordable housing threshold goals as required by the Rhode Island’s Low and Moderate Income Housing Act.

1.b.ii. Outcomes and Benefits of Redevelopment Strategy:

The abatement and cleanup of the hazardous building materials will make the neighborhood a safer place for the target area’s sensitive populations e.g., infants and residents over the age of 64. The seniors within the site’s census tract represent 22% of the population which is higher than the county’s average - 15%, state’s average - 16%, EPA’s region average - 17%, and the country’s average - 15%. This population is more susceptible to damage from environmental pollutants and will benefit from the cleanup. In fact, the community and the Town of North Smithfield will benefit from the outcome of these efforts.

The abatement of the hazardous building and the rehabilitation of the buildings will bring it up to Energy Star standards. Moreover, this project will incorporate a solar photovoltaic system taking advantage of the historic manufacturing building’s southward facing sawtooth roof. This will make the project an environmentally sustainable development. Some of the rehabilitation elements involve roof and gutter systems, windows, doors, insulation, and energy efficiency upgrades, siding and a host of other green elements. The rehabilitation will also include new unit layouts, landscaping, and associated parking. In addition, there will be restoration of the historic façade. Green elements include low flow water conserving fixtures, energy efficient lighting and appliances, energy efficient heating systems, and ventilation systems that reduce moisture in bathrooms and kitchens and promote healthy air. A resident “Green User Manual” will also be provided as part of the Lease package. And lastly, a grand mill building, rich in history, will once again be placed back into a productive and active use.

Additional anticipated outcomes include, job creation, funding leveraged through the economic reuse of the Site, much needed affordable housing to the community, reuse or acres of greenspace created for communities, and eliminate the potential risk of the community being exposed to hazardous building materials. In addition, significant public benefits, beyond employment, is that the development will boost the annual local tax base by an estimated $45,000 and increase property values within several blocks of the Site, due to the physical restoration and enhanced use of the Site. Furthermore,

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1 EPA EJScreen Tools

NWBRV Andrews Mill N. Smithfield, RI - EPA FY2022 Brownfields Cleanup Grant Application
based on a preliminary projection of construction spending impact using the IMPLAN multipliers from a 2010 study for the RI Housing Resources Commission, Andrews Mill construction is estimated to generate 331 direct and indirect construction jobs earning $16.2 million of worker income, and $42.6 million in total economic activity Statewide.

1.c.i. Resources Needed for Site Reuse:

Our development team has completed over $107M in development activity, all of which involved a combination of both Federal and Non-Federal Funds. We are recognized as the Affordable Housing Development leader in Northern Rhode Island and a premier Developer within the State. NWBRV has demonstrated a record of competency for projects similar to the scope of the Andrews Mill project.

NWBRV has already secured and/or is currently working to secure significant resources that are relevant to the cleanup and redevelopment project. The Project’s redevelopment/construction budget for this project is $28,424,653. Part of our fund-raising efforts was getting the Andrews Mill listed with the National Register of Historic Places. We are pleased to say the mill is now registered with the National Register of Historic Places and the Federal Historic Tax Credits ($1,689,167) is all but assured and will be a part of the closing on all the financing. An investor for the Historic Tax Credits will be identified within the next nine months.

To support the $28,424,653 Project’s redevelopment/construction budget, a listing of the funding sources is detailed below. All resources listed are past investors of our economic development projects over the past 20 years.

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<th>Source/Organization</th>
<th>Amount</th>
<th>Status</th>
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<td>LIHTC Equity</td>
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<tr>
<td>AHP 1st/Subsidized Advance/Citizens</td>
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<td>AHP Direct Subsidy/Citizens</td>
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<td>RIH HOME/HTF</td>
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<tr>
<td>Federal Historic TC Equity</td>
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<td>Secured</td>
<td>December, 2023</td>
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<td>State of RI CDBG</td>
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<tr>
<td>State of RI HRC BHRI Bond</td>
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<td>October, 2023</td>
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<tr>
<td>NWC Acquisition Loan</td>
<td>$600,0000</td>
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In addition, NWBRV have leverage $600,000 in the acquisition of the site, stabilizing the roof of the manufacturing building with temporary patch repairs, maintaining, and securing the site and buildings. Documentation that substantiates these commitments of secured funding is attached as Attachment A.

1.c.ii. Use of Existing Infrastructure:

This grant will facilitate the use of existing infrastructure located both at the proposed site and within the target area. First and foremost, the grant will directly support the abatement and cleanup of hazardous building materials identified through the Andrews Mill building complex, an effort which is complementary to its revitalization plans and which will result in a more extensive use of the facility, instead of abandoning and/or demolishing the structures and building a new facility at a greenfield site, which would further exacerbate local sprawl. Additionally, the grant will also facilitate the use of existing infrastructure within the target area and proximate to the proposed site, including but not limited to the current local utilities of (electric, sewer, water, gas and fiber optic internet), streets, and recreational trails along the Branch River. There are no identified infrastructure deficiencies that would prevent the revitalization of this property. The development will also make use of existing public infrastructure such as hospitals and schools within one mile, and public transit services (RIPTA or MBTA) along with culture and/or entertainment opportunities all within one-half mile.

2. Community Need and Community Engagement

2.a.i. The Community’s Need for Funding:

The census tract for the Andrews Mill development [0128.01] is one of three tracts in the Town of North Smithfield and holds a population of 4,968 residents - representing 39% of the overall Town population of 12,582. This population size places North Smithfield 27th out of 39 Rhode Island municipalities in relation to population size. However, for Towns in Rhode Island, low population size tends to equate to higher Median Family incomes. Case in point, of the 12 municipalities ranking below North Smithfield in population size, nine [75%] rank above North Smithfield in Median Family Income.

The difference with North Smithfield is that the Town has ardently fostered the inclusion of affordable housing. Of the Town’s 413 affordable units, 118 [29%] have been developed in partnership with NWBRV. Through the process of working with the Town, we have come to understand that the Town’s lack of affordable housing is having a ripple effect on future generations of resident family members. College graduates cannot afford to purchase in Town and there are no rental and/or affordable units available. In addition, North Smithfield’s population is expected to grow to a total 13,331 by 2040. Based on a household size of 2.47, the Town will require 683 new households to meet their population demands.

NWB RV Andrews Mill N. Smithfield, RI - EPA FY2022 Brownfields Cleanup Grant Application  3
As for their existing housing stock, nearly 72% of homes in North Smithfield were constructed before 1980, making most the Town’s housing stock more than 40 years old. This presents a significant challenge for health, safety and affordability as these homes often lack adequate maintenance updates, proper insulation, and efficient electrical and heating systems. In fact, 80% of the current units are limited to home ownership, while the remaining 20% are assigned as rental. However, 23% of the home ownership units and 56% of the rental units are cost burdened, noting that these households spend more than 30% of their annual income on housing costs.

In keeping with scaling up affordable housing options, redevelopment of the Andrews Mill site directly ties into goals of the North Smithfield Branch Village Revitalization plans to create affordable housing, incubator space for entrepreneurs, retail and office space. The planned uses of the site include remediation of hazardous materials and waste, conserving open spaces, strategies for a walkable community, increasing access to the river by creating a river walk along the Branch River, preserving the architectural character that is original to the area, plans for innovative land use techniques including low impact development, creating a range of housing opportunities, all of which are in alignment with the town’s revitalization efforts. The uses proposed by the town in the Branch Village Revitalization plans are in line with the residential, office, and retail plans for the Initiative.

The project furthers the highlighted goals of the North Smithfield Branch Village Revitalization plans including economic development, affordable housing development, mixed-use development, creating a walkable environment, historic preservation, and reuse. The redevelopment of Andrews Mill will also allow the Town to meet the State mandate of the required 10% affordable housing goal; an achievement that only six of the 39 municipalities have been able to secure.

During the first half of the 20th century, the textile industry of New England underwent a serious decline which adversely affected North Smithfield firms. Tupperware’s purchase of two North Smithfield factories helped stabilize the local economy in the 1950’s. During the same decade, Slatersville village properties, once owned by one company, were sold piecemeal. With the abandonment of mills, came a significant decay of the structures, fostering blight, vandalism, hazardous waste dumping, squatting and crime. As a result, the decline of these structures not only pose a significant burden on Town municipal resources, but such pollutants serve as direct links to decades of extensive contaminated Brownfield exposure and waste for area residents. These hazardous environmental issues inevitably disproportionately affect already vulnerable population including children, women of childbearing age, minority groups, and the elderly. Cumulative effects include possible elevated respiratory illness from dust containing metals, asbestos, and organic vapors; elevated blood lead levels due to decay of lead-based paint at former industrial sites and on older neighborhood housing stock; and cancer risk from eating contaminated fish or exposure to contaminated subsurface vapors. As a result, the target area either exceeds or meets the high rates of chronic lower respiratory disease, asthma, youth lead poisoning and cancer, as compared to the County, State and Nation.

The statistics reveal a small population among whom many possess little or no discretionary income, due to receiving only a fixed income, having limited income earning potential, earning too little income from work, or earning no income from work at all. These sensitive populations are represented in percentages higher than or equal to those found in the County, the State, and the United States – populations over age 64 and Populations with less Than High School Education.

In addition, Brownfields have negatively impacted the welfare of the target area’s sensitive populations, by creating blighted areas, inviting vandalism and crime, discouraging adjacent property owners from maintaining or improving their properties, and causing emigration to surrounding communities with lower property tax rates and housing prices. This grant will complement and facilitate NWBRV’s redevelopment plan, which will generate two important positive outcomes: 1) improving the buildings, property, and area appearance, which will incentivize its neighbors to maintain and/or improve their own properties; and 2) countering emigration, by having NWBRV continue to serve as an, and become a more powerful attractor and retainer of people for the target area.

Regarding the draw on other initial sources of funding, NWBRV has already demonstrated success in securing funds for eventual complete site redevelopment through Historical Tax Credits. However, due to the small population size of both the target area and the community, and the existence of a variety of economically impoverished sensitive populations in higher percentages when compared to the County, State of Rhode Island, and the United States. The ultimate result is an extremely limited amount of initial funding that the community or the target area can potentially contribute to this project, and a demonstration that NWBRV truly needs this Brownfields Cleanup Grant.

2.a.ii.(1) Threats to Sensitive Populations - Health or Welfare of Sensitive Populations:

During the first half of the 20th century, the textile industry of New England underwent a serious decline which adversely affected North Smithfield firms. Tupperware’s purchase of two North Smithfield factories helped stabilize the local economy in the 1950’s. During the same decade, Slatersville village properties, once owned by one company, were sold piecemeal. With the abandonment of mills, came a significant decay of the structures, fostering blight, vandalism,

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2 2020 Housing Fact Book | HousingWorks RI
3 EPA’s EJSCREEN Tool
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hazardous waste dumping, squatting and crime. As a result, the decline of these structures not only pose a significant burden on Town municipal resources, but such pollutants serve as direct links to decades of extensive contaminated Brownfield exposure and waste for area residents. These hazardous environmental issues inevitably disproportionately affect already vulnerable population including children, women of childbearing age, minority groups, and the elderly. Cumulative effects include possible elevated respiratory illness from dust containing metals, asbestos, and organic vapors; elevated blood lead levels due to decay of lead-based paint at former industrial sites and on older neighborhood housing stock; and cancer risk from eating contaminated fish or exposure to contaminated subsurface vapors. As a result, the target area either exceeds or meets the high rates of chronic lower respiratory disease, asthma, youth lead poisoning and cancer, as compared to the County, State and Nation².

In addition to the previously identified sensitive populations, statistics reveal a small population among whom many possess little or no discretionary income, due to receiving only a fixed income, having limited income earning potential, earning too little income from work, or earning no income from work at all. These sensitive populations are represented in percentages higher than or equal to those found in the County, the State of Rhode Island, and the United States – populations over age 64 and Populations with less Than High School Education².

These sensitive populations are more susceptible to damage from environmental pollutants because they have either underdeveloped or compromised biological systems. Within the target area, there is not only a high prevalence of hazardous building materials containing asbestos, but also a high prevalence of LBP, as most occupied housing units that are located there were built prior to the banning of lead paint in 1978. Remediation of these items will facilitate a reduction of the threat to these sensitive populations.

In addition, Brownfields have negatively impacted the welfare of the target area’s sensitive populations, by creating blighted areas, inviting vandalism and crime, discouraging adjacent property owners from maintaining or improving their properties, and causing emigration to surrounding communities with lower property tax rates and housing prices. This grant will complement and facilitate NWBRV’s redevelopment plan, which will generate two important positive outcomes: 1) improving the buildings, property, and area appearance, which will incentivize its neighbors to maintain and/or improve their own properties; and 2) countering emigration, by having NWBRV continue to serve as an, and become a more powerful attractor and retainer of people for the target area.

2.a.ii.(2) Threats to Sensitive Populations - Greater Than Normal Incidence of Disease and Adverse Health Conditions:

As a high burden of environmental pollution is often borne by these aforementioned sensitive populations, the contaminants identified in prior environmental investigations of Andrews Mill have exerted a disproportionate impact upon the sensitive populations located within the target area. This is corroborated by data showing that the target area compares unfavorably to the State of Rhode Island and the United States regarding multiple public health issues, ones that may be associated with exposure to hazardous substances or petroleum.

In fact, per the EPA Website’s ‘MY Environment’ tool the target area for the Andrews Mill development notes “Impaired” for Andrews Mill target area Water Quality Index. In addition, Cancer Risk pollutants also affect this area with the top five pollutants being: Formaldehyde Risk [53.40%], Benzene Risk [14.24%], Carbon Tetrachloride Risk [13.80%], Acetaldehyde Risk [7.02%], and 1,3-Butadiene Risk [4.10%].

Additional EPA EJSCREEN Tool Highlights include:

- Providence County is at or above the 80th percentile compared to the State and to the Nation for the following EJ Indexes; Traffic Proximity and Volume, and Hazardous Waste Proximity.
- Providence County is at or above the 80th percentile when compared to the rest of EPA Region 1 for the following EJ Indexes: NATA Diesel Particulate Matter, NATA Respiratory Hazard Index, Traffic Proximity and Volume, Lead Paint Indicator, Risk Management Plan (RMP) Proximity, and Hazardous Waste Proximity.
- Providence County is in the 82nd percentile both nationally and within the US EPA Region 1 for the demographic indicator of Linguistically Isolated Population.
- The Town of North Smithfield is in the 98th percentile for Proximity to Super Fund sites compared to the State.
- The Site is located on the Branch River, approximately 0.64 miles downstream from the Stamina Mills, Inc. Superfund property.
- The Andrew Mill Census Tract ranks in the 82nd percentile nationally in population over age 64.

Through a controlled cleanup of Andrews Mill, which will involve both preventing dispersed airborne contaminants, as well as ultimately removing these hazards, the risk to these sensitive populations in terms of cancer, asthma, and infant mortality will be reduced.
2.a.ii.(3) Threats to Sensitive Populations – Promoting Environmental Justice:

As previously noted, the target area is home to several economically impoverished, sensitive populations who disproportionately share the negative consequences resulting from the presence of brownfields. Specifically, the abundant brownfields in the North Smithfield area create a disincentive to investors/private companies looking to economically invest in the target area, which prevents expansion of the tax base and reduction of the property tax rate; this has a disproportionately negative effect on these economically-impoverished sensitive population groups, who have fixed incomes, live in poverty, or have reduced or no employment/income opportunities, and are thus especially sensitive to changes in the property tax rate (whether they own or rent their housing). This grant will address or facilitate the identification and reduction of threats to these economically impoverished sensitive populations by complementing and facilitating NWBRV’s redevelopment plan, which will then generate two important positive outcomes: an increase in investment within the target area and a corresponding expansion of the tax base; and an increase in employment, as a result of NWBRV both growing their budget and their audience.

By the sheer fact that the Andrews Mill redevelopment is directed toward fair and affordable housing, President Biden’s Justice40 Initiative will be strictly adhered to in providing no less than 40% investment in the areas of clean energy and energy efficiency, clean transit; affordable and sustainable housing; training and workforce development to disadvantaged populations, as also noted in Section 1.b.ii. Funding from Federal Historic Preservation, along with other federal programs such as HOME and the Housing Trust Fund, guarantee that the 40% parameter will be met in serving these disadvantaged populations.

Actions/items laid out in the attached initial Analysis of Brownfields Cleanup Alternatives [ABCA] Preliminary Evaluation for Andrews Mill serve to detail items pertinent to the Justice40 Initiative requirements. Furthermore, to assure all aspects of Justice40 Initiative are targeted, fervent utilization of the EPA EJSCREEN and EnviroAtlas tools will be employed to actively work with the Town, local partners, as well as our design, engineering, and construction teams.

2.b.i. and 2.b.ii. Project Involvement and Roles:

The following local community partners will have active, meaningful involvement with respect to both cleanup and redevelopment of the site:

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Specific Role(s) in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Engage North Smithfield (ENS)</td>
<td>Cynthia Roberts,</td>
<td>Arrange facilities for public meetings. ENS commits to connecting NWBRV with their constituency and clients to further community engagement relating to the hazardous building material abatement cleanup, the site redevelopment and site reuse. Virtual meeting will be held if necessary due to pandemic.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:Cynthia@ricadv.org">Cynthia@ricadv.org</a>, (401) 864-7890</td>
<td></td>
</tr>
<tr>
<td>Grow Smart RI</td>
<td>John Flaherty,</td>
<td>Participate in public meetings and public engagement. Provide information related to additional state funding for redevelopment technical assistance in smart development and expertise in decision-making with the site’s reuses.</td>
</tr>
<tr>
<td></td>
<td><a href="mailto:JFlaherty@GrowSmartRI.com">JFlaherty@GrowSmartRI.com</a>, (401) 309-8077</td>
<td></td>
</tr>
<tr>
<td>Blackstone Valley Advocacy</td>
<td>Toni Marie Gomes &amp; Kim Demers</td>
<td>Assist in presenting and conducting health-related monitoring and education for public meetings, particularly during the project’s cleanup phase; distribution of community outreach materials to their networks through their various platforms (e-mail groups, e-newsletters, social media, website)</td>
</tr>
<tr>
<td>Health Equity Zone (HEZ)</td>
<td><a href="mailto:Toni@bvdvadvocacycenter.org">Toni@bvdvadvocacycenter.org</a>, (401) 723-3057</td>
<td></td>
</tr>
</tbody>
</table>

2.b.iii. Incorporating Community Input:

Community input is a cornerstone of NWBRV’s development practices and values which requires community engagement. Traditionally to obtain community input the organization engages with indoor public meetings. However, due to the pandemic precautions will be taken and virtual platforms such as Zoom will be used for public meetings. To provide basic information from the public meetings, response to community input, progress with the hazardous building material abatement and redevelopment of the site, NWBRV will share information via social media platforms like Facebook and the organization’s website.

NWBRV will implement an aggressive, multipronged plan for communicating project progress to the local community that will last throughout the duration of the project. In addition, a written Community Relations Plan will be developed for the project. For those who may be unable to speak English or have hearing or reading impairments, NWBRV will provide accommodations including, but not limited to: translators, document reading services, and access to assistive technologies such as teletypewriter relay services. NWBRV and its project partners are also prepared to adhere to CDC guidelines for COVID-19 as it relates to community feedback and outreach. We will use the Socially Distant Engagement Ideas for EPA Brownfield Grant Applicants as a resource for alternatives to face-to-face meeting (e.g. Zoom teleconferences, QR codes, flyers, local TV and radio, etc.).
3. Task Descriptions, Cost Estimates, and Measuring Progress

3.a. Proposed Cleanup Plan:

Primary investigations that documented the extent of current environmental concerns including a Phase I ESA, Phase II ESAs, Hazardous Building Materials Inventory (HBMI), and cleanup planning were completed at the site between 2016 and 2020 under the oversight of the Rhode Island Department of Environmental Management (RIDEM). Overall, the results of the environmental investigations and HBMI identified that various hazardous building materials were prevalent throughout the site buildings, including asbestos-containing materials (ACM), lead-based paint (LBP), components potentially containing PCBs or mercury, and other universal wastes. In accordance with local, State, and Federal laws, these hazardous building materials must be abated, removed, and properly disposed prior to or during site renovation and redevelopment activities.

Specifically, extensive quantities of building materials containing asbestos at concentrations greater than one percent were identified in several components of the former Andrews Mill buildings. These asbestos-containing materials (ACM) include approximately 13,950 square feet of pipe fitting and insulation debris; 560 pipe fittings insulation; 10,680 square feet of floor tile and mastic; 162 windows with impacted glazing/caulking materials; 4,500 square feet of floor leveler material; 970 square feet of ceiling panels; 2,760 square feet of roof flashing; and 595 square feet of roof panels/shingles impacted with asbestos. The HBMI also included an inspection for the presence of lead-based paint (LBP) using a direct-reading x-ray fluorescence (XRF) analyzer. According to the XRF testing, several painted surfaces throughout the former Andrews Mill buildings were found to contain elevated levels of lead, greater than 1.0 mg/cm², which are considered “lead-based” according to the U.S. Housing and Urban Development (HUD) Lead-Based Paint Guidelines. In addition, electrical ballasts, associated with fluorescent lighting fixtures and several wall-mounted electrical transformers, were observed throughout the Andrews Mill buildings, potentially containing PCBs in their dielectric fluid. A total of approximately 1,118 fluorescent light tubes and several heating thermostats, presumed to contain mercury, along with lead-containing batteries for exit/emergency lighting fixtures were also identified in the buildings.

The asbestos, lead-based paint, and universal wastes are potential health risks to future site occupants (residential reuse), workers, and the public. In accordance with the preliminary Analysis of Brownfields Cleanup Alternatives (ABCA) and local, state, and federal laws/regulations, the cleanup plan to mitigate these environmental health risks consists of full abatement, removal, and proper off-site disposal of asbestos-containing building materials (ACM); lead-based paint (LBP), universal wastes, and other hazardous building materials identified in the site buildings.

During cleanup, standard industry abatement and construction practices to protect the public and our sensitive populations will be employed to ensure safe conditions; these measures include dust controls and building/hazard containment systems to contain potentially air-borne hazardous materials and debris during abatement and cleanup activities and air clearance testing following the abatement work. The cleanup work will be conducted by licensed abatement contractors in the State of Rhode Island and materials will be properly disposed of at licensed disposal facilities.

A Community Relations Plan (CRP) will be prepared, a public meeting and 30-day public comment period will be conducted prior to initiating cleanup activities, and the ABCA will be finalized. The Qualified Environmental Professional (QEP) will prepare a Site-Specific Quality Assurance Project Plan (SSQAPP) and will conduct confirmatory sampling, as necessary. The project will implement Green Remediation Principles and Techniques including waste recycling/reuse, reduced energy consumption, engine idling. Furthermore, the site has already been registered with RIDEM Voluntary Cleanup Program (VCP) and final cleanup documentation will be prepared and submitted to RIDEM. RIDEM will oversee and approve final environmental regulatory closure and construction for redevelopment and reuse of the site buildings for affordable housing will begin, once the proposed abatement and cleanup actions are completed.
### 3.b.i. – 3.b.iv. Project Implementation, Schedule, Leads, and Outputs:

#### Task 1: Cooperative Agreement Oversight

**i. Implementation:** Project coordination and oversight; establish a Brownfields Advisory Committee (BAC) that meets quarterly and includes members of the Site development team, Town, RIDEM, EPA, local community partners, and citizen/project stakeholders; Develop a Request for Proposals (RFP) and select a Qualified Environmental Professional (QEP), based on a competitive bid process (40 CFR 30); attend the National Brownfield Conference; facilitate and attend quarterly up to 3 meetings with the BAC at regular intervals throughout the project; prepare performance and financial reports including quarterly reports, MBE/WBE forms, Davis-Bacon Act (DBA) reporting, and routine updates to EPA’s Assessment, Cleanup, and Redevelopment Exchange System (ACRES) online database. **NWBRV will also provide additional in-kind oversight and program coordination at no cost to the grant.**

**ii. Schedule:** RFP and selection of the QEP and establish BAC within the first 3 months (1st Quarter) of funding award; BAC meetings to be held on a quarterly basis; quarterly reports and ACRES database updates each quarter during the 3-year grant period; and other reporting (Davis-Bacon Act, MBE/WBE), as necessary.

**iii. Leads:** NWBRV will lead all programmatic grant activities. NWBRV will develop RFP for QEP selection and establish BAC. QEP will prepare quarterly reports, DBA and MBE/WBE reports, and ACRES updates.

**iv. Outputs:** A BAC will be established and will meet quarterly (12 meetings); competitive RFP and contract for QEP selection; 12 quarterly reports; and DBA and MBE/WBE reporting and ACRES input/updates over 3-year grant period.

#### Task 2: Community Outreach & Engagement

**i. Implementation:** In accordance with our community engagement plan (Section 2b above), NWBRV and its QEP will develop a Community Relations Plan (CRP) for approval by EPA and RIDEM. NWBRV, QEP, and community partners will develop an information repository; notify residents, adjacent landowners, and target communities of public meetings and cleanup schedules; hold public meetings to inform, educate, solicit public input, and provide written responses to comments; update the target community regarding cleanup and redevelopment activities; and prepare public outreach materials. A 30-day public comment period will be held to solicit input on the draft ABCA and the ABCA will be subsequently finalized. NWBRV will provide outreach and communication to the public prior to, during, and following the abatement/cleanup work. Questions received from the public will be incorporated into a FAQ document for public review. **NWBRV will also provide additional public outreach and economic development support at no cost to the grant.**

**ii. Schedule:** Community outreach will be performed throughout the 3-year grant period. The 1st public meeting will be held for the 30-day public comment period on the proposed abatement/cleanup plans and will occur within 6 months (2nd quarter) of the grant award and following preparation of draft cleanup plans and specifications (i.e., to solicit public input on the final draft abatement/cleanup plans). The 2nd meeting will be held during on-going contractor abatement/cleanup work (progress status meeting), and the 3rd meeting will be held at end of abatement/cleanup.

**iii. Leads:** NWBRV and QEP, with BAC assistance will conduct community outreach and engagement tasks.

**iv. Outputs:** Information repository; CRP; at least 3 public outreach meetings and associated informational materials and public meeting documentation (ads, agendas, comments, responses to comments, sign in sheet); FAQs, and final ABCA.

#### Task 3: Site-Specific Cleanup Activities

**i. Implementation:** This is the key task associated with the abatement/cleanup grant, with most of the EPA cleanup funds used to abate/cleanup asbestos, lead-based paint, universal wastes, and other hazardous materials at the Andrews Mill site by a licensed abatement/cleanup contractor. NWBRV will direct all abatement/cleanup and site reuse and redevelopment planning efforts. Prior to start of on-site abatement of hazardous building materials, the QEP (with NWBRV oversight) will prepare final abatement/cleanup plans and specifications for review and approval by the NWBRV, EPA, and RIDEM; prepare updated abatement/cleanup cost estimates, as necessary; conduct a pre-bid site visit with proposed abatement contractors; and prepare a SSQAPP for confirmatory sampling. NWBRV and its QEP will review contractor bids and select an abatement/cleanup contractor. The QEP and selected abatement/cleanup contractor will obtain necessary abatement/construction permits and will coordinate with the local health agency on health monitoring activities during cleanup, as necessary. NWBRV and the QEP will be in communication with the BAC, RIDEM, and EPA team members throughout this phase of work. The selected abatement/cleanup contractor will prepare an abatement project plan and will perform all required abatement and cleanup of hazardous building materials in accordance with the project cleanup plans and specifications.

**ii. Schedule:** The QEP will prepare project documents and cleanup design within 3 to 6 months of selection (winter 2022/spring 2023). A SSQAPP will be prepared, and permits will be obtained at this time. We plan to start cleanup activities in the summer/fall of 2023 and will complete cleanup work within 3-year grant period.

**iii. Lead:** QEP with NWBRV oversight will lead the preparation of final abatement/cleanup plans and specifications, conduct pre-bid site visit, and prepare SSQAPP. NWBRV with assistance from BAC and QEP will make final selection of abatement/cleanup contractor. QEP and selected cleanup contractor will obtain final cleanup permits, as necessary, and selected contractor will perform proposed abatement/cleanup work.

**iv. Outputs:** Abatement/cleanup plans and specifications, bidding documentation, contract with selected abatement/cleanup contractor, SSQAPP, construction/cleanup permits, and abatement/cleanup of hazardous building materials at the Andrews Mill site in accordance with the ABCA and approved design/cleanup plans.
### Task 4: Oversee Site Cleanup

**i. Implementation:** NWBRV and its QEP will monitor and oversee project progress, public health, and welfare during the proposed abatement/cleanup activities; oversee the contractor’s cleanup activities; attend up to three project status meetings with BAC; inspect and oversee the contractor’s abatement/cleanup work; perform the necessary project monitoring and reporting during and after cleanup to ensure compliance with the plans, specifications, and requirements for regulatory closure under the RIDEM VCP; review and approve pay requisitions and Davis-Bacon Act documentation; perform a final site walk-through; and collect confirmatory samples, as necessary. Health monitoring and air sampling will be conducted, as needed. A RIDEM VCP closure report will be prepared to obtain RIDEM approval following completion of the abatement/cleanup work and EPA grant closeout documentation will be completed at the end of project.

**ii. Schedule:** We plan to start cleanup activities in summer/fall 2023 and will prepare closure reports and documentation in spring 2024. We see no impediment to completing this work within the 3-year grant period.

**iii. Leads:** With direction and assistance from NWBRV, the QEP will oversee, monitor, and document site abatement and cleanup activities. NWBRV will assist with project oversight and will be in communication with BAC, RIDEM, and EPA team members throughout the abatement/cleanup phase of work. The QEP will also prepare project closure reports and assist NWBRV with grant closeout documentation.

**iv. Outputs:** 3 project status meetings, payment requisitions and DBA documentation, confirmatory sampling and health monitoring, as necessary, RIDEM VCP Closure Report, RIDEM approval and certification of abatement/cleanup activities, and grant closeout documentation.

### 3.c. Cost Estimates:

<table>
<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1: Cooperative Agreement Oversight</th>
<th>Task 2: Community Outreach and Engagement</th>
<th>Task 3: Site-Specific Cleanup Activities</th>
<th>Task 4: Oversee Site Cleanup</th>
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<td>$17,750</td>
<td>$780,000</td>
</tr>
</tbody>
</table>

**Task 1: Cooperative Agreement Oversight:** $2,500 for NWBRV personnel to oversee the project, select QEP, and attend meetings with Brownfields Advisory Committee (50 hours at $50/hour = $2,500); $2,500 travel total ($500 airfare + $1,000 hotel + $750 food forNWBRV staff to attend EPA national Brownfields conference plus $250 local travel mileage/tolls to meetings); $500 for supplies (copies, phone calls, contract documents); and $5,000 contractual for QEP to assist NWBRV with cooperative agreement oversight. **Total Task 1 = $10,500.**

**Task 2: Community Outreach and Engagement:** $1,000 for NWBRV personnel to conduct public outreach and meetings (20 hours @ $50/hour); $250 travel to meetings (mileage/tolls); $250 for supplies (copies, ads, mailings); and $2,500 contractual for QEP to assist NWBRV on public outreach efforts. **Total Task 2 = $4,000.**

**Task 3: Site-Specific Cleanup Activities:** $2,500 for NWBRV personnel to oversee site-specific abatement and cleanup activities including QEP-prepared abatement/cleanup work plans and contractor bidding (50 hours @ $50/hour); $250 for supplies (copies, mailings); and $615,000 contractual for QEP time/costs (estimated at $15,000) for preparation and submittal of final cleanup/abatement plans to RIDEM, preparation of cleanup design plans and specifications and contractor bidding documents, selection of a cleanup contractor, and project meetings with BAC, EPA, RIDEM, and cleanup/abatement contractors, as needed. The estimated total cleanup contractor costs for performing the abatement/cleanup activities using Federal Funding under this cleanup grant is $600,000. **This task also includes the required 20% cost share of $130,000 toward the abatement/cleanup work. Total Task 3 = $747,750.**

**Task 4: Oversee Site Cleanup:** $2,500 for NWBRV personnel for oversight during the proposed cleanup/abatement activities (50 hours @ $50/hour); $250 local travel to meetings (mileage/tolls); $15,000 contractual for QEP to oversee the cleanup/abatement activities, perform necessary project monitoring and reporting, collect confirmatory samples, attend 3 project status meetings with BAC, and prepare a remediation closure report. **Total Task 4 = $17,750.**
3. d. Measuring Environmental Results: NWBRV and its QEP will routinely update an electronic matrix (Microsoft Excel spreadsheet) of tasks, target dates, and financial expenditures to track and evaluate outputs and progress of the cleanup grant. A summary of measurable outputs are shown above for each task. NWBRV will also track and evaluate project progress on tasks completed, money spent, and project grant compliance through routine submittals of quarterly status reports and EPA’s ACRES online database system; copies of documents will also be kept in a centralized repository. NWBRV will be in regular communication with the QEP, RIDEM, and EPA through regular BAC meetings, construction meetings, and weekly telephone calls to ensure that the project stays on schedule, on budget, and that there are no impediments in achieving the project outputs in a timely manner. We will also track ongoing outcomes including acres of brownfields cleaned up; types of contaminants abated/cleaned up; reduction of environmental risks; number of jobs created; number of affordable housing units constructed, quantity of greenspace; amount of leveraged cleanup funds; leveraged site redevelopment funds; and other leveraged or economic outcomes. The outputs and outcomes will be reviewed and revised regularly in conjunction with regional EPA and MEDEP staff to ensure the project is successful.

4. Programmatic Capability and Past Performance

4.a.i. & 4.a.ii Organizational Structure and Key Staff: Key development staff NWBRV assigned to work on the various components of the project, bring years of experience in construction, business, housing and community development. Staff includes Joe Garlick, Executive Director (28 yrs.) - fundraising and project financing/closing; Terri Barbosa, Real Estate Development Director (23 yrs.) - project development/approvals; Christian Caldarone, Director of Asset Management (13 yrs.) - property management oversight and ongoing asset management; Paula Sterlacci, Finance Director (23 yrs.) - oversee organizational fiscal management, Bill Lewis, Co-Director of Real Estate Development (8 yrs.) - project development and new initiatives; Paula Rezendes, Project Manager (28 yrs.) - project coordination; Paul Brais, Construction Manager (33 yrs.) - contract development and construction oversight; and Stan Eason, Construction Supervisor (20 yrs.) - construction management/oversight. The Project Director for this grant and project is Bill Lewis, NWBRV’s Co-Director of Real Estate Development. Mr. Lewis will oversee programmatic activities, compliance with grant requirements, and in conjunction with a QEP, will oversee actual abatement/cleanup and redevelopment activities. He will be advised and guided by the BAC, NWBRV’s Executive Director, Joseph Garlick, NWBRV’s Board of Directors, and the Town Manager for North Smithfield, Rhode Island, Paul Zwolenski. Decision making at NWBRV will proceed through a two-step process, with preliminary review and approvals by its BAC, then proceeding to its Board of Directors for final approvals.

4.a.iii. Acquiring Additional Resources: Additional expertise and resources, such as the QEP to oversee the environmental work, and the abatement cleanup contractor to perform the environmental work, will be selected via a fair, open, and competitive process (RFP) that meets all relevant local, state, and federal requirements. This process will be overseen by Bill Lewis, Joseph Garlick, and the membership of the Brownfield Advisory Committee, and will be approved by the NWBRV Executive Committee/Board of Directors. If staff turnover should occur at NWBRV during the course of this project and grant, the acting Executive Director of NWBRV at the time will assume an interim hands-on role, while NWBRV undertakes their prescribed and streamlined process for hiring replacement staff in a timely manner.

4.b.i.(1) Currently Has or Previously Received an EPA Brownfields Grant - Accomplishments: NWBRV received two (2) FY2017 EPA Brownfields Cleanup Grants for $200,000 and $400,000, respectively, and one (1) FY2018 EPA Brownfields Cleanup Grant for $200,000 for the cleanup of three parcels associated with The Woonsocket Rubber Company Mill and former Island Machine Company Mill sites in Woonsocket, RI. Our cooperative agreement oversight and program development for these 3 cleanup grants included establishing a Brownfields Advisory Committee (BAC), selection of a QEP, attendance at EPA and RIDEM conferences, and status reporting to EPA (quarterly reports and regular updates to ACRES). Community outreach and public outreach meetings have been conducted. The specific outputs and outcomes that have been accomplished thus far include competitive solicitation and selection (RFP) for QEP services, registration of the sites in ACRES, engagement of the community partner organizations identified in the grant proposals to ensure that commitments are implemented, enrollment of the sites into the RIDEM Site Remediation Program, development and approval of final cleanup plans, design plans and specifications, competitive bidding process, selection, and contact with a cleanup contractor; cleanup activities were initiated in December 2020. These accomplishments and project status have been presented in EPA quarterly reports and ongoing updates within EPA’s ACRES on-line database.

4.b.i.(1) Currently Has or Previously Received an EPA Brownfields Grant - Compliance with Grant Requirements: For each of these 3 grants, NWBRV has an approved workplan and cooperative agreement with EPA and maintained full compliance with its schedules, terms, and conditions throughout the grant periods. Due to impacts to the project timeline from Covid-19, project extensions for these grants have been approved by EPA until September 2022 to allow for additional cleanup work to be completed with the remaining cleanup funds. Out of a total of $800,000 for the 3 grants, expenditures/drawdowns to date total $359,415.37; total remaining balance of $440,584.63. All required quarterly reports, ACRES updates, and financial status reports have also been completed in a timely manner. NWBRV continues to adhere to the updated schedules and meeting project milestones presented in the Workplan and cleanup actions are currently ongoing. NWBRV has made great progress towards achieving the expected results of these cleanup grants and is eager to continue its past success with new cleanup funding for the Andrews Mill site.

NWBRV Andrews Mill N. Smithfield, RI - EPA FY2022 Brownfields Cleanup Grant Application
Attachment B - Threshold Criteria for Cleanup Grants

1. **Applicant Eligibility**

   The Woonsocket Neighborhood Development Corporation d/b/a NeighborWorks Blackstone River Valley (NWBRV) is a non-profit organization and maintains tax-exempt status under section 501(c)(3) of the Internal Revenue Code. Documentation of tax-exempt status is included as *Attachment C*.

2. **Previously Awarded Cleanup Grants**

   NWBRV affirms that the Andrews Mill property in North Smithfield, Rhode Island has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds**

   NWBRV affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership**

   NWBRV affirms that it is the sole owner of the site under fee simple title.

5. **Basic Site Information**

   a) **Site Name:** Andrews Mill (Lot 29);
   b) **Site Address:** 761 Great Road, North Smithfield, Rhode Island 02896; and
   c) **Current Owner:** Woonsocket Neighborhood Development Corporation d/b/a NeighborWorks Blackstone River Valley (NWBRV).

6. **Status and History of Contamination at the Site**

   a) **Type of Contamination:** Hazardous Substances.
   b) **Operational History and Current Uses:** The Site is currently vacant and has a long history of prior industrial and commercial use: edge tool and cotton production; textile flocking; woolen product manufacturing; and plastic manufacturing by Tupperware Company followed by Atlantic Thermoplastics (ATP). The Site was developed circa at least 1795 for scythe and other edge tool manufacturing. Sometime after 1805, a small cotton factory was started in conjunction with the scythe works. Subsequently, after acquisition of the Site by James A. Pitts and Son, the factory was run as a flocking mill until circa 1913, when the textile mill was demolished. Circa 1918, the Andrews Mill was constructed at the Site for use as a worsted mill (manufacturer of woolen products). The Site was used for woolen product manufacturing until the late 1950s when Tupperware purchased and used the Site for plastic manufacturing. Tupperware operated on the Site until the early to mid-1990s, when the Site was sold to Atlantic Thermo Plastics (ATP) for continued plastic manufacturing use. In approximately 2010, the Site was purchased from ATP by 765 Great Road LLC, at which time the Site was used by a waste collection company for truck and vehicle maintenance and the storage of solid...
waste; the waste collection company eventually vacated the Site circa 2014.

c) **Environmental Concerns:** As noted below, multiple investigations have been conducted to characterize the site between 1993 and 2020; however, primary investigations that documented the extent of current environmental concerns were completed between 2016 and 2020 and no abatement or remedial actions have occurred at the site to date. Specifically, Phase I ESAs and Phase II ESAs were completed, and a Hazardous Building Materials Inventory (HBMI) was completed in 2016. The results of the HBMI study identified hazardous building materials such as asbestos-containing materials (ACM), lead-based paint (LBP), components potentially containing polychlorinated biphenyls (PCBs) or mercury, and other universal wastes throughout the site buildings.

d) **Contaminant Sources and Extent:** Due to the types of building materials used in the original construction and maintenance, repairs, and various renovations over the years by prior owners, hazardous building components have been identified throughout the site building, including asbestos-containing materials (ACM); lead-based paint (LBP); components potentially containing polychlorinated biphenyls (PCBs), such as light ballasts; mercury-containing lamps; fluorescent light bulbs; thermostat switches; and other universal wastes.

Specifically, extensive quantities of building materials containing asbestos at concentrations greater than one percent were identified in several components of the former Andrews Mill buildings. These asbestos-containing materials (ACM) include approximately 13,950 square feet of pipe fitting and insulation debris; 560 pipe fittings insulation; 10,680 square feet of floor tile and mastic; 162 windows with impacted glazing/caulking materials; 4,500 square feet of floor leveler material; 970 square feet of ceiling panels; 2,760 square feet of roof flashing; and 595 square feet of roof panels/shingles impacted with asbestos. The HBMI also included an inspection for the presence of lead-based paint (LBP) using a direct-reading x-ray fluorescence (XRF) analyzer. According to the XRF testing, several painted surfaces throughout the former Andrews Mill buildings were found to contain elevated levels of lead, greater than 1.0 mg/cm², which are considered “lead-based” according to the U.S. Housing and Urban Development (HUD) Lead-Based Paint Guidelines.

In addition, electrical ballasts, associated with fluorescent lighting fixtures and several wall-mounted electrical transformers, were observed throughout the Andrews Mill buildings, potentially containing PCBs in their dielectric fluid. A total of approximately 1,118 fluorescent light tubes and 3 heating thermostats were identified at the property, which are presumed to contain mercury. In addition, lead-containing batteries for exit/emergency lighting fixtures were also identified during the HBMI.

In accordance with local, State, and Federal laws and regulations, these hazardous building materials are required to be abated, removed, and properly disposed of off-site, prior to or during site renovation and redevelopment activities that may potentially disturb these materials.
Attachment B - Threshold Criteria for Cleanup Grants

7. **Brownfield Site Definition**

The Andrews Mill site is an eligible site for Brownfields funding. Furthermore, NWBRV 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 United States government.

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

The following environmental assessments have been completed for the site:

- Environmental Site Assessment (ESA), Environmental Science Services, 29 October 1993.
- Limited Phase II Environmental Assessment, Kenyon Environmental (Kenyon), 13 December 2000.
- Hazardous Building Materials Inventory (HBMI), Ransom Consulting, Inc. (Ransom), 7 April 2016.
- ASTM Phase I Environmental Site Assessment (ESA), Ransom, 4 April 2017.
- Addendum to ASTM Phase I ESA, Ransom, 22 May 2017.
- Pre-Site Investigation Public Notice, Ransom, 28 August 2017.
- Phase II Limited Subsurface Investigation, Ransom, 19 September 2017.
- Post-Site Investigation Public Notice, EA, 2 January 2020.

The 2017 Phase I ESA was completed in accordance with ASTM International Designation: E 1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental*
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*Site Assessment Process*, which meets the requirements of the United States Environmental Protection Agency (USEPA) All Appropriate Inquiry (AAI), 40 CFR Part 312. In addition, the subsequent investigations including Phase II ESAs and the HBMI were completed in accordance with ASTM International Designation E1903-11 and constitute equivalent Phase II ESAs for investigation of the site, in accordance with the RIDEM Remediation Regulations.

9. **Enforcement or Other Actions**

There are no ongoing or anticipated environmental enforcement actions, other actions, orders, or local, state, or federal inquiries for the site. Furthermore, the applicant is not aware of any current records of judgments, liens, or other enforcement actions regarding this site.

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

The applicant affirms that a property-specific eligibility determination is not required.

11. **Threshold Criteria Related to CERCLA/Petroleum Liability**

a. **Property Ownership Eligibility – Hazardous Substance Sites**

   iii. **LANDOWNER PROTECTIONS FROM CERCLA LIABILITY**

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

   Based on discussions with EPA Region 1 Brownfields staff and EPA’s legal counsel prior to submission of this grant proposal, although NWBRV did not complete applicable updates to the 2017 Phase I ESA prior to acquiring the property in 2018 (e.g., fully meeting the Bona Fide Prospective Purchaser Liability Protection provision under CERCLA), NWBRV is still eligible to apply for an EPA Brownfield Cleanup Grant, since they are not liable under CERCLA and/or that CERCLA does not apply to the specific cleanup of hazardous building materials at the site. This determination by EPA was supported by the following factors: 1) the contaminants of concern are associated with hazardous building materials (e.g., asbestos, lead-based paint, and hazardous universal wastes), 2) the buildings and hazardous building materials are intact, stable, contained, and bound within their original construction materials and a release of these materials to the environment, as defined under CERCLA, has not occurred at the property, and 3) continuing obligations have been met relative to ensuring that the environmental conditions at the property have not been exacerbated and continue to be secured and maintained by the current owner (NWBRV).

   (a) **Information on the Property Acquisition**: Under a purchase and sale agreement, ownership of the site was transferred to the Woonsocket Neighborhood Development Corporation d/b/a NeighborWorks Blackstone River Valley (NWBRV) from the Trustee of the Chapter 7 Bankruptcy Estate of Anthony.
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Davidson, the transferor, through the execution of a Trustee’s Deed on March 23, 2018. Therefore, NWBRV affirms that it is the sole owner of the site, under fee simple title. NWBRV also affirms that it does not have any familial, contractual, corporate, or financial relationships or affiliations with prior owners or operators (or other potentially responsible parties) of the property.

(b) **Pre-Purchase Inquiry:** Prior to acquisition of the property, a Phase I ESA, dated April 4, 2017, and Addendum, dated May 22, 2017, was completed on behalf of the Woonsocket Neighborhood Development Corporation d/b/a NeighborWorks Blackstone River Valley (NWBRV). The Phase I ESA was conducted in accordance with the requirements of the American Society for Testing and Materials International Designation: E 1527-13, *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, 2013* (ASTM E1527-13) and U.S. EPA All Appropriate Inquiry (AAI), 40 CFR Part 312. Ransom’s project staff, who performed and oversaw the completion of the Phase I ESA, meet the definition of an Environmental Professional as defined in §312.10 of 40 CFR Part 312 and Ransom’s staff has the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site. In addition, the Rhode Island Department of Environmental Management (RIDEM) has certified NWBRV as a Bona Fide Prospective Purchaser (Certification Statement, August 22, 2017). However, although NWBRV did not conduct applicable updates to the Phase I ESA within 180 days, prior to final site acquisition, they are still eligible to apply for an EPA Brownfield Cleanup Grant, since they are not liable under CERCLA and/or that CERCLA does not apply, as previously discussed above (i.e., a release to the environment of hazardous building materials has not occurred).

(c) **Timing and/or Contribution Toward Hazardous Substances Disposal:** According to historical records, the site was first developed circa 1795 for scythe and other edge tool manufacturing. Sometime after 1805, a small cotton factory was started in conjunction with the scythe works. Subsequently, after acquisition of the Site by James A. Pitts and Son, the factory was run as a flocking mill until circa 1913, when the textile mill was demolished. Circa 1918, the Andrews Mill was constructed at the Site for use as a worsted mill (manufacturer of woolen products). The Site was used for woolen product manufacturing until the late 1950s when Tupperware purchased and used the Site for plastic manufacturing. Tupperware operated on the Site until the early to mid-1990s, when the Site was sold to Atlantic Thermo Plastics (ATP) for continued plastic manufacturing use. In approximately 2010, the Site was purchased from ATP by 765 Great Road LLC, at which time the Site was used by a waste collection company for truck and vehicle maintenance and the storage of solid waste; the waste collection company eventually vacated the Site circa 2014. The property has been vacant since 2014.

Therefore, the contaminants of concern in the form of hazardous building materials originated in the site buildings at the time of construction, maintenance, and/or repairs by previous owners, which occurred prior to NWBRV acquisition.
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of the property in 2018. In addition, NWBRV has not arranged for the disposal of hazardous substances to the site or transported hazardous substances to the site.

(d) Post-Acquisition Uses: Since property acquisition in 2018, NWBRV, has maintained and secured the property and site buildings; the property is currently vacant and not utilized, pending final cleanup and redevelopment.

(e) Continuing Obligations: Since the extent of contamination was confirmed during the supplemental site assessments primarily completed between 2016 and 2020, NWBRV has demonstrated appropriate care and taken reasonable steps in addressing the identified hazardous building materials and contaminants of concern, since taking ownership in 2018. No significant repairs, renovations, or modification to the site, resulting in a release of the hazardous building materials to the environment, has occurred, while the property has been owned by NWBRV. The property remains secure, the buildings are currently intact and stable, and access to the property and the site building is restricted and limited to authorized personnel only. Furthermore, the property and area is routinely patrolled by the North Smithfield Police Department.

No continuing or ongoing releases were identified at the site during the supplemental assessments between 2016 and 2020 (e.g., leaking tanks, dumping, etc.). Based on the environmental assessment reports to date, we understand the hazardous building materials and contaminants of concern do not currently pose an imminent hazard, but still pose moderate risks of harm to human health and the environment, if these materials are disturbed during future site redevelopment and/or building renovations. Therefore, the hazardous building materials will be properly abated and cleaned up during future site redevelopment activities in accordance with state and federal regulations to further prevent human and/or environmental exposures (e.g., abatement of asbestos and lead contamination).

Currently, and during proposed future developments at the site, NWBRV will 1) comply with land-use restrictions and institutional controls, 2) assist and cooperate with those performing the cleanup and provide access to the property, 3) comply with information requests and administrative subpoenas that have or may be issued in connection with the property; and 4) provide legally required notices.

12. Cleanup Authority and Oversight Structure

a. Cleanup Oversight Plan: NWBRV will endeavor to ensure that the cleanup of hazardous substances at the site will comply with applicable local, state, and federal laws and regulations, and that the cleanup actions will be protective of human health and the environment. NWBRV will competitively bid and retain a qualified environmental professional (QEP), in accordance with the competitive procurement provisions of 40 CFR Part 30 (for non-profit organizations). The QEP will work with NWBRV to design, prepare specifications and bidding documents, and oversee and document remediation
activities at the site, as well as to assist with the interface between the target community, RIDEM, and EPA. The QEP will also assist with the competitive bid process for selecting an environmental cleanup contractor to perform the proposed cleanup actions. NWBRV will contract with the selected QEP and environmental cleanup contractor prior to initiating cleanup activities. The site has also been enrolled and registered with the RIDEM Remediation Program and Rhode Island State Voluntary Cleanup Program (VCP).

b. **Access Plan for Adjacent or Neighboring Properties:** NWBRV, in conjunction with the Town of North Smithfield, views the adjacent property owners (primarily residential) as project stakeholders and cooperative partners in the proposed cleanup actions at the site. NWBRV will be in frequent communication with these property owners prior to and during cleanup activities. At this time, the proposed cleanup activities are limited to the site and are not anticipated to extend to adjacent properties. However, if the proposed cleanup or confirmatory sampling/monitoring requires access to the adjacent properties, a formal written access agreement will be obtained from the adjoining property owners, if necessary. Furthermore, the Town of North Smithfield and the RIDEM have the regulatory authority to access adjacent properties for emergency situations.

13. **Community Notification**

NWBRV has fulfilled the community notification requirements for the site.

a. **Draft Analysis of Brownfields Cleanup Alternatives:** An Analysis of Brownfields Cleanup Alternatives - Preliminary Evaluation (which includes a description of the site, contamination, and cleanup standards/laws; a description of cleanup alternatives evaluated; and a description of the proposed cleanup) was prepared prior to the public notice and public meeting. The draft ABCA and draft grant proposal were made available for public review at NWBRV offices during regular business hours. The public comment period closed at end of business day (5:00 pm) on November 23, 2021.

b. **Community Notification Ad:** NWBRV published a community notification ad on November 11, 2021 (at least 14 days prior to submittal of the grant application to EPA, per grant guidelines) in the *Valley Breeze, North Smithfield, Blackstone, and Woonsocket Edition*, a local weekly newspaper. This advertisement stated that a copy of the draft ABCA and draft grant application were available for public review and comment; provided instructions for commenting on these draft documents; identified the location where the draft documents were located for review; and presented the date and time of the public meeting.

c. **Public Meeting:** NWBRV subsequently held a public meeting at 6:00 p.m. on Thursday, November 18, 2021. The public meeting was held on-line virtually through Zoom. The purpose of the meeting was to discuss the draft grant application, draft ABCA, and consider and responds to public comments prior to submittal of this grant proposal.
d. *Submission of Community Notification Documents*: The following items are included in *Attachment D*:

1) A copy of the draft ABCA-Preliminary Evaluation;
2) A copy of the newspaper advertisement demonstrating notification to the public and solicitation for comments on the proposal;
3) A summary of the questions/comments received, responses to the questions/comments, and applicable meeting notes from the public meeting; and
4) A list of attendees from the public meeting.

14. **Statutory Cost Share**

a. *Sources of Required Cost Share*: NWBRV has fully committed to the requisite 20% cost share of $130,000 (based on $650,000 grant award, with waiver of the $500,000 limit) in the form of in-kind and cash contributions toward eligible cleanup activities. NWBRV will also seek opportunities to augment matching funds in the form of supplemental contributions of labor, materials, and/or services from a non-federal source including in-kind services, program development, oversight, and documentation.

b. *Hardship Waiver Request*: Not applicable; a Hardship Waiver Request is not requested.

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

NWBRV requests a waiver of the $500,000 limit and requests $650,000 in cleanup funding for the Andrews Mill site. Justification of this waiver request is provided in *Attachment E*.

16. **Named Contractors and Subrecipients**

- **Contractors**: Not Applicable
- **Subrecipients**: Not Applicable