City of Gloversville
Office of the Mayor
3 Frontage Road
Gloversville, New York 12078-2897
518-773-4551 (phone) 518-773-2593 (fax)

RISEDPH LEATHER TANNERY
NARRATIVE INFORMATION SHEET

1. Applicant Identification:
   Mayor Vincent DeSantis
   Gloversville, NY City Hall of
   3 Frontage Road
   Gloversville, NY 12078
   518-773-4551
   vdesantis@cityofgloversville.com

2. Funding Requested:
   a. Brownfield Cleanup Grant
   b. Federal Funds Requested
      i. $500,000 is being requested
      ii. Gloversville is not requesting a waiver of the 20% cost share requirement
      iii. Gloversville is not requesting a waiver of the $500,000 limit

3. Location:
   a. City of Gloversville
   b. Fulton County
   c. New York State

4. Target Area and Priority Site/Property Information:

   The Target Area (TA) for this EPA Cleanup Grant (Gloversville census tract 36035970700) is
   located in the western end of the city which was historically occupied by tanneries surrounded
   by modest homes ($68,000 vs. $340,000 NYS, US Census 2019) on small (1/4 acre or less)
   lots. The TA’s population of 3,400 has lived in persistent poverty since the closing of the nearby
   tanneries starting in the 1970s as evidenced by the high rate of poverty (32% vs 13% NYS,
   2019 US Census) and low median household income ($30,000 vs. $72,000 NYS, 2019 US
   Census).

   The proposed project site is the former Risedorph Leather Tannery 13-site located at 130-146
   West Eighth Avenue, Gloversville, NY

   Target Area Names/Addresses:
   (1) Risedorph Leather Tannery, 130-146 West Eighth Street, Gloversville, NY 12078
       Census Tract Number: 36035970700
Contacts:

a. **Project Director:**
   Mayor Vincent DeSantis  
   City Hall of Gloversville  
   3 Frontage Road  
   Gloversville, NY 12078  
   518-773-4551  
   vdesantis@cityofgloversville.com

b. **Chief Executive/Highest Ranking Official:**
   Mayor Vincent DeSantis  
   City Hall of Gloversville  
   3 Frontage Road  
   Gloversville, NY 12078  
   518-773-4551  
   vdesantis@cityofgloversville.com

5. Population = 14,878

6. **Other Factors:**

<table>
<thead>
<tr>
<th>Other Factors Checklist</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community Population is 10,000 or less</td>
<td></td>
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<tr>
<td>The applicant is, or will assist a federally recognized Indian tribe or United States territory</td>
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<td>The proposed site(s) is impacted by mine-scarred land</td>
<td></td>
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<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></td>
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<td>The proposed sites(s) is adjacent to a body of water (i.e. the border of the priority site(s) is contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).</td>
<td>1</td>
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<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
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<tr>
<td>The reuse of the proposed site(s) will facilitate renewable energy from wind, solar or geothermal energy.</td>
<td>3</td>
</tr>
<tr>
<td>The reuse of the proposed site(s) will incorporate energy efficiency measures.</td>
<td>3</td>
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<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>
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7. Letter from State (attachment letter from the NYSDEC)

8. Releasing Copies of Applications: This information is not private and may be made available to the public.
Letter from NYSDEC
November 23, 2021

Mayor Vincent DeSantis  
City of Gloversville  
City Hall  
3 Frontage Road  
Gloversville, NY 12078

Dear Mayor DeSantis:

This is to acknowledge that the New York State Department of Environmental Conservation (DEC) received a request from HRP Associates on behalf of the City of Gloversville, dated November 9, 2021, for a state acknowledgement letter for a Federal Year 2022 United States Environmental Protection Agency (USEPA) Brownfields grant.

I understand that the City of Gloversville plans to submit a Brownfield Cleanup grant application for hazardous substances and petroleum in the amount of $500,000. Focus of the funding will be the cleanup of the Risedorph Tannery, located on West 8th Avenue in the city of Gloversville. The site is known to be contaminated with tannery wastes, including VOCs and metals. Funding will also be allocated to conduct inventory characterization and for associated planning (including reuse and/or remediation planning) and community involvement activities.

DEC encourages initiatives to redevelop brownfields with the goal of mitigating any environmental and health impacts that they might pose.

Sincerely,

Karen Diligent  
Director, Bureau of Program Management

ec: T. Wesley, USEPA Region 2  
A. Devine, USEPA Region 2  
R. Mustico, DEC Albany  
B. Huyck, DEC Region 5  
D. Lisa, HRP Associates
Grant Narrative – Brownfield Cleanup Grant
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i Background and Description of Target Area

The City of Gloversville, New York (General Purpose Unit of Local Government), is seeking a $500,000 Cleanup Grant to mitigate contaminated sediment at the former Risedorph Tannery in Gloversville, NY. The Risedorph Tannery operated for decades, at its peak employing approximately 400 people. The site owner went bankrupt, abandoning the site in the early 1990s leaving behind a partially collapsed 50,000 ft² (est.) tannery building with hazardous chemicals within drums and open tanks scattered throughout the site. The City acquired the site due to tax delinquency and removed the chemicals, demolished the tannery and completed a site investigation. Due to the hazardous conditions posed by the site, it has sat underutilized since 2002 from a lack of funding.

Gloversville, NY (the applicant), a small rural City located in Fulton County in the foothills of the Adirondack Mountains along the Cayadutta Creek, was the birthplace of glove making. Due to historical industrial development along the Creek, numerous contaminated sites are located within a federally designated floodplain. The widespread tannery industry across Gloversville has left little green space for redevelopment; Gloversville is forced to reuse brownfields. Once the glove-making capital of the world, the City of 14,700 (2020 est.) was occupied by over 200 tanneries, located in neighborhoods that once employed thousands of surrounding residents. The tanneries now sit decaying with broken windows, collapsed roofs, exposed asbestos-containing material, and graffiti, inviting vagrants. Many of the tanneries have totally collapsed leaving behind piles of asbestos containing rubble, and according to the City Fire Marshall, two tanneries have been set on fire by an arsonist within the past year. The declining trend has been set, and the sites will only deteriorate and pose a greater threat to nearby residents. Since many of the tanneries have closed prior to the advent of environmental regulations, and the City has not experienced any economic growth in decades, not only are the sites decaying, but they have not been investigated nor are they secured to prevent children from entering.

For over 150 years the industry was the main economic driver for the community. Gloversville once supplied 90% of all gloves sold in the United States. Production peaked in the 1950s with tanneries and glove shops employing 80% of Gloversville residents. Economic and policy changes in the 1940s signaled a decline of the industry. By the 1980s, outsourcing forced 86 tanneries to close and eliminated thousands of jobs. The industry struggled to adjust to regulatory pressure, after decades of dumping toxic tanning agents into local landfills, onto soil, and into the excessively polluted Cayadutta Creek. The Creek changed colors day to day based on the dyes dumped into the water. Suds 10 feet high would float on top of the water. For decades, the Creek was devoid of any life. Leathersellers paid millions for a sewage treatment plant in 1971 and millions more to upgrade the plant in the 1980s. Competitive and regulatory pressure continued to mount on the tanning industry. By the mid-1990s, only a few manufacturers remained, and its population was reduced by 45% from its peak of 23,700 in 1950. The overseas migration and collapse of the glove industry left Gloversville financially depressed, littered with brownfields and a population with persistent poverty, health issues, and a higher-than-expected number of cancers per capita.

The Target Area (TA) for this EPA Cleanup Grant (Gloversville census tract 36035970700) is located in the western end of the city which was historically occupied by tanneries surrounded by modest homes ($68,000 vs. $340,000 NYS, US Census 2019) on small (1/4 acre or less) lots. The TA’s population of 3,400 has lived in persistent poverty since the closing of the nearby tanneries starting in the 1970s as evidenced by the high rate of poverty (32% vs 13% NYS, 2019 US Census) and low median household income ($30,000 vs. $72,000 NYS, 2019 US Census).

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

The proposed project site is the former Risedorph Leather Tannery site located at 130-146 West Eighth Avenue, Gloversville, NY. The 13-acre site is currently vacant except for three separate 8,000 ft² (est) warehouse buildings which are in good condition and used by the City to store DPW equipment. Two ponds (an upper and lower), separated by a concrete spillway, are located along the southern property boundary. A stream (a tributary to the Cayadutta Creek, an important brown trout fishery due to cleanup efforts) enters the site in the southwest corner of the site, connects to the upper pond, flows through a spillway to the lower pond and then enters the Cayadutta...
City of Gloversville, Risedorph Tannery

Creek which flows through the City of Gloversville. A stormwater system (consisting of eight catch basins) collects stormwater and entrained sediments in the developed portion of the sites (former tannery building), and discharges to the lower pond.

Historically, Risedorph Leather Tannery was used to de-hair, tan, dye, and finish animal skins from the mid-1800s to the 1990s. The tanning and finishing of hides involved many processes, each of which utilized chemicals and generated various liquid and solid waste streams. Chemicals and products used in these processes included mineral spirits, aerosols, degreaser, sulfuric acid, formic acid, nitrobenzene, tar, hydrogen peroxide, selenium, sodium hydroxide, methyl ethyl ketone, arsenic, chromium, copper, lead magnesium, dyes, petroleum products, paints, and fungicides. During the early years of operation and prior to the establishment of wastewater treatment facilities in Gloversville, the liquid wastes generated in the various site processes were either released to the ground or discharged directly to the tributary of the Cayadutta Creek. In the late 1970s, tanneries were mandated to construct and maintain wastewater pretreatment plants and monitoring stations. The pretreatment plant at Risedorph Leather began operation around 1980 with liquid waste being discharged to the Gloversville municipal sewer system. In the late 1980s, Risedorph Leather shut down operations and was transferred to Feuer Leather Group, Inc. who used the site for leather storage with no active tanning activities.

Feuer’s Leather’s storage operations ceased in the late 1990s and the site was abandoned, leaving behind a partially collapsed 50,000ft² (est.) tannery building with hazardous chemicals within drums and open tanks scattered throughout the site. The site sat abandoned and deteriorating and was a hazard to the surrounding public. With the site owner in bankruptcy, the City took title of the property (via delinquent taxes) in March of 2000. With limited available funding and no owner to fund the site cleanup, the City entered the site into the NYSDEC’s Environmental Restoration Program (ERP) in 2000 and the site was assigned ERP# B00150. The ERP provided 75% of the funding to demolish the partially collapsed building, remove waste and chemical drums and conduct a site investigation.

From 2000 to 2002, a total of 104 drums of hazardous substances, 6,223 gallons of No. 6 oil and 2,224 gallons of a liquid containing metals were disposed off-site and the collapsed tannery was demolished. Subsequently, a preliminary site investigation was completed under the NYSDEC ERP which determined that 8,700 tons of arsenic and chromium contaminated sediment is present in the on-site ponds and stormwater system (piping and catch basins). In addition, an estimated 32,000 tons of arsenic and chromium contaminated soils are present within a 100,000 ft² area (ranging in depth from the surface to 12 ft. below grade) of the former tannery building and in the northwest section of the site where material was stored outside. Contamination of soils is associated with the historical release of tannery chemicals and wastes to the ground. Sediment contamination is caused by run-off entraining contaminated surficial soils that enter the stormwater system and are discharged to the lower pond, eventually entering Caycatta Creek. Exposure pathways include direct contact with, and ingestion of soils contaminated with heavy metals, by persons accessing the site. Dust generated from these soils could result in an inhalation exposure pathway. In addition, exposure to surface water and eating fish is an issue. The site is partially fenced to restrict access to the property, but evidence of trespassing exists, and children are known to access the site for fishing.

Since the building demolition and removal of hazardous chemicals was completed in 2002 the site has been vacant and underutilized due to a lack of funding. The site is ineligible for additional ERP funding since the estimated remediation cost of $6M exceeds the ERP of $3.5M limit and NYSDEC’s policy is to not segment remediation projects. In the meantime, the City has worked to identify the site’s best use and defines a funding strategy (see Section 1.b.i) that will address the hazards and revitalize the site as a recreational park (see Section 1.a.i). Gloversville realizes the cleanup grant will not be adequate to remediate the site, but the grant will address the contaminated sediment to allow fishing within the on-site ponds and stream and eliminate contaminated sediment from entering the Cayadutta Creek. More importantly, the grant will provide leverage to secure additional funding to improve the quality of life of nearby residents by mitigating environmental hazards, preventing contaminated sediments from entering the stream and creating a recreational park.
1.a.i. Reuse Strategy and Alignment with Revitalization Plans
Gloversville updated its Comprehensive Land Use Plan (GCLUP) in 2015, which lays out a redevelopment vision obtained through public input. The vision includes strengthening the commercial/industrial base; increasing employment; addressing brownfields; providing affordable housing, recreational spaces, and access to the Cayadutta Creek and improving the creek’s water quality, incorporating energy efficient buildings/renewable energy and green development methods (e.g., EV charging stations, solar rooftop installations) and expanding the existing FJ & G Rail Trail to connect the community with the Creek and downtown. Further, the Mohawk River Watershed Management Plan’s vision is to “protect and restore the quality and ecological function of water resources” (i.e., Cayadutta and its tributaries). To achieve this goal the Plan recommends utilizing soil management practices to address brownfields.

The Rail Trail has been completed within the City. The Trail was designed for usage by walkers, joggers, bicyclists, cross-country skiers, etc. and has been an overwhelming success and proud accomplishment for the community. Public outreach completed with an existing NYS Brownfield Opportunity Area (BOA – provide funding to conduct public participation, and plan brownfield revitalization) grant identified Risedorph as a key component for additional development of the City’s trail network due to its size, location adjacent to the existing FJ&G trail and access to the ponds and creek. The City is currently using the BOA grant to complete conceptual plans to revitalize the site as a destination park with a variety of activities including a Bicycle Motocross (BMX) track, recreational open space, fishing along the creek and within ponds, ¼ mile hiking/biking trail to connect the site to the nearby FJ&G trails that provides access to downtown Gloversville.

1.a.ii. Outcomes and Benefits of Reuse Strategy
At completion, Risedorph site will provide a park with access to existing FJ&G trail. The Park will include a parking area, comfort facilities, a BMX track, recreational space, and access to the stream for fishing, as well as a trail that interconnects with FJ&G trail that provides access to downtown Gloversville. The attraction and accessibility of the Creek, and connection afforded by the bike/walking trail will create more interest and attract more people to the outdoors and increase patronization of local businesses and eateries, increasing commerce. Additionally, the proposed clean-up activities will aid in continuing local and state efforts to improve the water quality in the Cayadutta Creek. The Creek today is protected by the New York State Department of Environmental Conservation (NYSDEC) as a Class C(T) stream for its capacity to support a trout population. Continued remediation of tannery waste locations is essential to the continuation of this positive trend.

The plan will assist with the cleanup of a legacy brownfield site, remove contaminated sediment and eliminate the potential for contaminated sediment to enter the creek (tributary to an important brown trout fishery), stimulate economic development (attract outside visitors to BMX park) and provide residents an alternative transportation method (biking) to job opportunities in downtown Gloversville. These activities will have direct and dramatic impacts on the area’s impoverished individuals (32 % TA vs 13% NYS poverty rate) consisting of children (less than 5) and adults with less than high school education that are exposed to lead paint and superfund sites at rates higher than similar populations within NYS and EPA Region 2. These issues have manifested themselves in elevated rates of disease and adverse health conditions as noted in section 2.a.ii(2). Once implemented low-income populations will have access to open space and outdoor activities and an alternative transportation method to downtown Gloversville for job opportunities.

1.b. Strategy for Leveraging Resources
1.b.i. Resources Needed for Site Reuse
As noted earlier the overall site revitalization plan is to redevelop the site as a recreational park with fishing access, BMX track and walking/biking trail that connects to the existing FJ&G trail which provides access to downtown Gloversville. To accomplish this the City has laid out a robust Roadmap of secured and available funding to achieve the sites redevelopment.

Secured Funding
• Site Planning - Gloversville will utilize a portion of the NYS BOA (awarded 2021) grant to assist with site planning
and community input.

- Additional site investigation - the original site remediation plan included excavation and offsite disposal of contaminated soil/sediment at an estimated cost $6M. However, based on public comment it was determined that the best use of the site is as a BMX track and park which would significantly reduce the site remediation costs since the site would be capped. To allow capping the NYSDEC will require additional soil sampling to further define the soil contamination. This investigation would be completed under Brownfield Assessment Grant BF96293821.

- Sediment removal - completed under this grant application

Once the above actions are completed the City will apply for the following funding to develop the site:

**Available Funding**

- Site Cleanup
  - RESTORE NY - provides cleanup and demolition funds ($150M+) to municipalities via an annual application process.
  - NYS Environmental Restoration Program (NYSERP) – provides 90% of funding to remediate eligible municipality owned sites. The site is eligible for funding; however, the current rules of the ERP program require a full implementation of the Record of Decision (ROD).

- Trail/ Park construction
  - NYS Office of Community Renewal (NYSOCR) – provides grants up to $1.75M for infrastructure upgrades and up to $900k in grants to design and construct trails.
  - NYS Parks, Preservation and Heritage (NYSPPH) – funds up to 75% of the total eligible project cost (capped at $500,000) for design and construction of a park.
  - USDOT Recreational Trails Program (RTP) – provides 20% cost share (up to $250,000) for design and construction of trails.

- Energy Conservation
  - NYS Energy Research Development Agency (NYSERDA) – provides grants for energy efficiency, EV Stations and renewable energy installation

In addition, the recently enacted Infrastructure Investment and Jobs Act will be reviewed for potential cleanup, redevelopment, and energy funding.

**1.b.ii. Use of Existing Infrastructure**

The reuse of the site will leverage existing infrastructure including sewer, water, natural gas, roads, and electricity for proposed on-site patron facilities (i.e., parking areas, bathrooms, etc.). The proposed use of the site will also increase use the FJ&G Rail trail which runs past the east side of the Risedorph site. A City redevelopment strategy review in 2018, determined the City’s infrastructure as follows:

- Water System - no capacity issues or immediate needs. However, due to the age of the existing water storage tank, the City is replacing it at cost of $5M ($3M from NYS Environmental Facilities Corporation grant).
- Wastewater - treatment plant has adequate capacity and remains in good condition.

Where necessary, funding is available via state grants and Fulton County IDA (local agency with ability to provide financial assistance via bonding) to upgrade existing infrastructure. Existing infrastructure at priority sites is available and adequate to support the proposed revitalization.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**2.a. Community Need**

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

Gloversville has limited discretionary funding. The City has experienced financial difficulties stemming from long term population loss (down 34% from its peak in 1950) and its inability to raise property taxes as it has nearly exhausted its constitutional taxing limit (NYS constitutionally restricts property tax increases of more than 2%). The constitutional limit is only exacerbated by Gloversville’s low median home values ($76,000 vs $125,000 for Fulton County and $313,000 NYS – 2019 US Census); substantial number of tax foreclosure sites; poor population (27.7% live in poverty compared 14.1% for NYS and 12.3% nationally, 2019 US Census) of 14,878; and flat retail
tax revenue due to loss of retail. The inability to raise revenue severely limits the City’s flexibility to address unforeseen expenses and to make on-going infrastructure investments. Without outside financial support, Gloversville has limited funding to remediate brownfields because it has a limited ability to raise additional funds.

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Population

EPA’s EJSCREEN tool indicated that sensitive populations include:

- Low income in the 84th percentile of NYS/Region 2/USA
- Less than high school education is in the 69th percentile of NYS/Region 2/USA
- Population less than age 5 is in the 77th percentile for NYS/Region 2/USA

The noted sensitive populations are exposed to:

- Lead paint is in the 95th percentile for NYS/Region 2/USA
- Superfund proximity is in the 88th percentile for NYS/Region 2/USA

Children under five years of age are exposed to various sources of lead due to the City’s early 1900’s housing stock and numerous brownfields. Testing has indicated that the children exhibit high blood lead levels (Gloversville 47.8/1000 vs 20.6/1000 Fulton County as reported by NYSDOH). According to the U.S. CDC, lead interferes with the development of the body’s organs, especially in young children, where it impedes learning. In addition, due to the numerous tanneries, residents are potentially exposed to soils and groundwater containing elevated concentrations of VOCs, metals, and PAHs. NYSDOH health statistics indicate that the area exhibits higher than average rates of cancer and infant mortality, which may be due to the presence of the noted contaminants. Beyond the health impacts, the area’s population suffers negative welfare impacts including over 20.7% of the County’s children living with food insecurity which exceeds NYS rate of 10.5% (2019 USDA Economic Research - % of population that lives greater than 1 mile from a supermarket and does not have a car). Further, the Fulton County’s 2019-2021 Community Health Needs Assessment indicated that 15% of Adults Reported 14 or More Days of Poor Physical Health versus 10% for NYS. In addition, the SocioNeeds Index created by Conduent Healthy Communities Institute (which measures socioeconomic need correlated with poor health) indicated that Gloversville is 84.1 (out of 100) and is ranked as a 5 (means highest needs out of a 1 to 5 rank) indicating Gloversville has one of the highest socioeconomic needs in NYS based on preventable hospitalizations and premature death.

The brownfield grant will result in the removal of hazardous substances within the site’s sediments and advance the site revitalization as a park that will improve residents’ quality of life and offer alternative transportation modes (biking) to job opportunities in downtown Gloversville.

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

Based on a review of NYS Department of Health information, Fulton County citizens (no Gloversville-specific information was available) suffer greater rates of the following Chronic Disease when compared to NYS:

- Lung cancer incidence rate - 67.70/100,000 vs 57/100,000 for NYS
- Heart Disease - 259.9/100,000 vs 214.9/100,000 for NYS
- Stroke Incidence rate - 39.2/100,000 vs 34.8/100,000 NYS
- Post Neonatal Deaths - 3.8/100,000 vs 1.5/100,000 NYS
- Incidence of elevated blood lead levels (10+ug/dl) in children < 6 yrs. - 12.2/1,000 vs 6.0/1,000 NYS
- Asthma hospital discharge rates - 19.9/10,000 residents Fulton County vs. 15.8/10,000 NYS

Lung cancer and Post Neonatal Deaths can be partially attributed to the area’s residents’ chronic exposure to PAHs and VOCs present in fill and proximity to RMP and Superfund sites. The elevated blood lead levels of children and elevated levels of lead in soils are due to children living in housing that was built in the early 19th century. Metals such as lead, cadmium, and arsenic can contribute to heart disease. It is not clear what causes asthma; however, there is evidence that exposure to chemicals including VOCs can trigger asthma.

The cleanup completed under this grant will assist in the mitigation of contaminants linked to the noted greater than normal incidence of disease and adverse health conditions.
(3) Promoting Environmental Justice
EJScreen listed the following populations that disproportionately share the negative consensuses from industrial, governmental and/or commercial operation or policies: low income; less than high school education; and children less than 5 years of age. To ensure that these individuals have an appropriate opportunity to participate and can influence rulemaking decisions that impact them, Gloversville will ensure that groups and agency’s representing their issues and concerns are included on all information distribution, meetings, and events. Throughout the process Gloversville will encourage site reuse to advance Environmental Justice objectives (improving property values, eliminating legacy sites and disinvestment and increasing access to open/recreational activities/spaces) to ensure the populations benefit from development that shape their neighborhoods. As needed, Gloversville will recommend program, policy and ordinance revisions to address concerns and ensure proposed revitalization is responsive to underserved populations and vulnerable groups. This grant will assist in obtaining community input regarding site remediation and reuse planning. Completing these items will assist in cleaning up a contaminated site that will provide open space, improved quality of life and elimination of hazardous substances.

2.b. Community Engagement
2.b.i. Project Involvement and 2.b.ii Project Roles
The City will develop a written Community Involvement Plan to document and formalize the process to share information and seek public input on cleanup and reuse planning. The public will be given ample opportunity to comment on the project cleanup and reuse through community meeting participation. The table below includes local organizations that will be included in the Community engagement and be involved in decisions involved with respect to roles in the project.

<table>
<thead>
<tr>
<th>Partner Name</th>
<th>Point of Contact</th>
<th>Specific Role in the Project</th>
</tr>
</thead>
<tbody>
<tr>
<td>Adirondack Velo Club</td>
<td>Doug Mosher (518) 762-1342</td>
<td>BMX track layout and bike trail design</td>
</tr>
<tr>
<td>Mohawk Valley Watershed Coalition, Fulton County Soil &amp; Water Conservation District</td>
<td>Jacob Hart (518) 762-0077</td>
<td>Advise on Creek impacts and sediment removal and park design view</td>
</tr>
<tr>
<td>Foothills Chapter of Adirondack Mountain Club</td>
<td>Gail Livingston, Chapter Chair (518) 441-1758</td>
<td>Provide comments, Assist with trail, recreational and open space design</td>
</tr>
<tr>
<td>Lexington Foundation</td>
<td>Wally Hart, Exec. Dir. (518) 736-3917 <a href="mailto:hartw@thearclexington.org">hartw@thearclexington.org</a></td>
<td>Obtain input from sensitive population &amp; assist in identifying/addressing EJ issues</td>
</tr>
<tr>
<td>Fulton County Depart of Public Health</td>
<td>Laurel Headwell, MS, Director; (518) 736-5720 <a href="mailto:lheadwell@fultoncounty.gov">lheadwell@fultoncounty.gov</a></td>
<td>Local health information, review contamination impacts</td>
</tr>
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2.a.iii Incorporating Community Input
The plan to involve stakeholders and obtain/incorporate community input will include three primary efforts: 1) The City will announce the award in a press release to the local newspaper and in ads placed on local radio stations and the local Public Access Television station to reach residents at all education and access levels. The announcement will also be posted on City websites and social media (Facebook and Twitter) and forwarded to community partners (Section 2.b.i) to distribute and place on their websites. 2) The City, in collaboration with the community partners, will host an initial outreach and “kick-off” meeting to acquaint community partners, stakeholders, (i.e., property owners, city officials, community organizations, etc.) and the media with the project. Meeting outcomes, community input and comments and responses will be posted on the City’s websites and community partner’s websites. 3) Gloversville will continue communication with stakeholders. The City will conduct quarterly public meetings and presentations to provide project progress updates and obtain input and comments from the community. Gloversville will evaluate the inputs in consideration of the task goals, strategy and reuse and provide written responses to the public.

At the close of the project, the City will hold a public meeting to share project outcomes. Presentation materials and minutes will be archived and placed on the City’s websites and social media pages. Social media and other
innovative methods will be used to reach out to and gather input from the public. If requested, news releases, web postings, written materials, etc. will be available in other languages for residents whose first language is not English. If community participation meetings are not possible due to COVID-19 the following will be completed at the frequencies noted above:

- Appropriate COVID-19 procedures will be implemented (i.e., masks, social distancing, etc.).
- **Video stream meetings, and link agendas and documents** - To create an effective online meeting, video segments will be timestamped and linked to agendas, minutes, and supporting documentation; and
- **Optimize for accessibility** - Meeting web pages and content will be checked to ensure documents are screen-reader friendly for accessibility, and closed captioning will be used when streaming video. Public meeting online participation tools, including conference calls for those without digital access, will be used to solicit public comment at each event. Comments submitted during meetings will be responded to immediately. Written or online comments will be responded to individually and presented at the next meeting.

### 3.0 TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS
#### 3.a Proposed Clean-Up Plan
The current estimated site remediation costs are $6M which includes sediment removal from the catch basin and ponds, soil excavation and off-site disposal. The majority of estimated cleanup costs (estimated to be over $5M) are associated with the costs are the excavation and off-site disposal of contaminated soils. However, the sediment within the catch basins is entering the lower pond and stream thereby impacting the aquatic life and restricting on-site fishing. Therefore, to initialize the site’s development Gloversville is proposing to initially remove the sediment for the existing stormwater basins (8) and associated piping and remove the sediment from the stream. Once the contaminated sediment is removed catch basin filters will be installed to capture the contaminated sediment and prevent it from entering the catch basins and in turn the stream. Once the sediment is removed contaminated sediment would be removed in the stream along the former main tannery building to meet Lowest Effect Levels for sediments. Also, the Lower Pond would be remediated to be of concentration and quality to contaminant levels identified in the Upper Pond (to levels of 30 ppm or less for both arsenic and chromium). These levels would meet the Severe Effect Levels of 33 ppm for arsenic and 110 ppm for chromium and meet the Lowest Effect Level for chromium of 26 ppm.

Further, the City will use funding from a Fulton County Center for Regional Growth Assessment Grant (BF96293821) to delineate soil impacts and NYS BOA funding to complete conceptual site design including BMX track, FJ&G interconnect trail, fishing access and parking for patrons’ facilities. Once the extent of the proposed development is defined and the extent of soil impacts is refined, the City will work with NYSDEC to develop a revised ROD that will consist of a realistic clean-up plan. It is likely that the cost of the revised clean-up plan would fall under the $3.5 million funding limit that is imposed on ERP Sites. The Risedorph site is already in the ERP program and final site remediation would be completed under that program. Contractors utilized for cleanup will comply with Davis Bacon wage compliance and be required to document wages with interviews and back-up.

### 3.b. Description of Tasks/Activities and Outputs (i. – iv)

<table>
<thead>
<tr>
<th>Task/Activity: Cooperative Agreement Oversight (Task 1)</th>
</tr>
</thead>
<tbody>
<tr>
<td>i. Project Implementation</td>
</tr>
<tr>
<td>Discussion of EPA-funded activities: Gloversville will serve as the main conduit for disseminating information, encouraging public participation, and retaining a QEP (Qualified Environmental Professional) to develop bid documents and oversee the project and to assist Gloversville with solicitations in selecting a qualified contractor to complete the remedial excavation project. Gloversville will submit quarterly reports and final reports. A Gloversville member will also travel to up to two brownfields conferences during the project timeframe.</td>
</tr>
<tr>
<td>Non-EPA grant resources needed to conduct task/activity: None</td>
</tr>
<tr>
<td>ii. Anticipated Project Schedule: Month 1 to Month 36 reporting quarterly; selection month #; etc.</td>
</tr>
<tr>
<td>iii. Task/Activity Lead: Gloversville</td>
</tr>
<tr>
<td>iv. Outputs: 12 quarterly reports, 12 quarterly financial status reports, participation in two brownfield conference events, QEP, Remedial Contractor(s)</td>
</tr>
<tr>
<td>Task 2: Project Management</td>
</tr>
<tr>
<td>i. Discussion of EPA-funded activities: QEP will prepare project documents including bid specifications and project plans including Stormwater Pollution, Prevention Plan (SWPPP), a Community Air Monitoring Program (CAMP), Odor Control Plan, Health and Safety Plan and a Remedial...</td>
</tr>
</tbody>
</table>
**Action Work Plan (RAWP).** QEP will assist Gloversville in selection of remedial contractor. Once contractor is selected and project plans developed, the project plans will be submitted to the Gloversville, NYSDEC and EPA for approval. Once all plans have been reviewed and approved by the appropriate regulatory agencies, the remedial excavation will start. QEP will oversee field activities. Once remedial activities are completed QEP will prepare a remediation report. In addition, QEP will prepare ACRES and assist Gloversville with preparation of reports.

**ii. Anticipated Project Schedule:** Month 1 to Month 36 reporting quarterly; selection month #; etc.

**iii. Task/Activity Lead:** Gloversville


**Task 3: Community Involvement**

**i. Project Implementation**

Discussion of EPA-funded activities: Gloversville and the QEP will lead public involvement efforts, assisted by remediation contractors as needed. Quarterly public meetings will be held, with information provided in easy-to-understand fact sheets and project summaries that can then be distributed among local community groups that may be interested in project progress. Social media outlets (Internet, Facebook™, Twitter™, Instagram™) and the “Local News Section” of the local newspaper will be utilized to provide a wide assortment of local community coverage. If a community participation meeting is not possible due to COVID-19, the following will be completed:

- **Video stream meetings**, and link agendas and documents. To create an effective online meeting, video segments will be timestamped and linked to agendas, minutes, and supporting documentation; and
- **Optimize for accessibility** - meeting web pages and content will be checked to ensure documents are screen-reader friendly for accessibility and closed captioning will be used when streaming videos. Public meeting online participation tools will be used to obtain public comment. Comments will be responded to during the meeting, and meeting or project revisions will be forwarded to the Steering Committee for consideration.

Non-EPA grant resources needed to conduct task/activity: Community Partners will help advertise public meetings and disseminate the project brochure.

**Anticipated Project Schedule:** Month 1 through Month 36; quarterly public meetings

**Task/Activity Lead:** Gloversville

**Outputs:** 12 public meetings, 1 project brochure, 2 articles for media updates

**Task/Activity 4: Remediation Activities**

**i. Project Implementation:** Discussion of EPA-funded activities: Selected remediation Contractor will complete following tasks:

1) Removal of sediment (estimated 100 tons) from eight catch basins and associated piping
2) Installation of sediment filters on 8 catch basins
3) Removal of sediment (estimated 8,100 tons) from ponds. A final report will be prepared summarizing the remedial activities, EPA and NYSDEC filings, project monitoring, contractor licenses and permits, waste manifests, and landfill receipts for the waste and Davis Bacon reporting.

**ii. Anticipated Project Schedule:** Month 1 through Month 36

**iii. Task/Activity Lead:** QEP

**iv. Outputs:** Contaminated sediment excavation, backfill, remediation report

### 3.c. Cost Estimates

**Budget Details:**

**Task 1 – Cooperative Agreement Oversight**

Personnel Costs: Travel: $2,460 (one committee person attending 2 brownfield conferences $1,230/event)

QEP RFP and Selection – 20 at $50/hr. = $1,000

Reporting – 100 hrs. at $50/hr. = $5,000

Contract Oversight – 100 hrs. at 50/hr. = $5000

**Task 2 – Project Management**

Remediation Contractor Bid document (QEP) - $5,000

Plan preparation (QEP)- $15,000

Review of Contractor Plans (QEP)- 20 hrs. at 110/hr. = $2,200

Remediation oversight/odor/CAMP (QEP)- 300 hrs. at 100/hr. = $30,000

Closure Report (QEP)– $15,000

**Task 3 – Community Involvement**

Personnel Costs: Supplies = $500 (copy paper/folders/printing costs for public handouts)

Contract QEP Project Manager, 3.6 hrs./quarterly meeting, 12 quarterly meetings; $110/hr. = $4,840

**Task 4 – Remediation Activities**

Removal and disposal of sediment from catch basins- Contractor Cost- $29,000

Installation of Sediment Filters- Contractor Cost- $10,000

Removal and disposal of contaminated sediment- $ 460,000

Contracted QEP – Oversight/MGT, including Davis Bacon Reporting = $15,000

Cost Share: The City of Gloversville will contribute 20% cost share of $100,000.00.
3d. Measuring Environmental Results
Gloversville will include an agenda item once per quarter at City Council meetings, which are open to the public, to review project progress and take corrective actions, when necessary, address any community concerns, guide the project and ensure EPA brownfield funds are expended in an efficient and timely manner. Should there be schedule delays or budget issues, these will be discussed with the EPA project managers. The QEP will coordinate activities with the NYSDEC. Required Quarterly Reports will be submitted in a timely manner to the EPA, detailing outputs, and outcomes of the project, and updating site information into the ACRES database. Outputs to be tracked will include the number of City Council meetings; actual outputs will be compared to the estimated number of outputs listed in Section 3.b. Gloversville will document outcomes/outputs that cannot be easily entered into ACRES (i.e., website updates, staff training, and community outreach/meetings) in quarterly reports. Gloversville will evaluate the project progress semi-annually, and, if goals are not being met, will discuss with EPA Project Officer, local stakeholders and the QEP(s) to discuss the shortcomings and adjust the project approach.

4.0 PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE
4.a. Programmatic Capability
4 a.ii Organizational Capacity and 4.a.iii Description of Key Staff
Gloversville is a general-purpose unit of local government within New York State. Gloversville is organized as a Mayor-Council structure under which a full-time Mayor is elected and is the chief executive and administrative head of the City, and the council is the policy making body. The City council meets twice per month to address issues, pass resolutions, and retain services. The council also hires heads of departments to run various City departments including Finance, Public Works, and Division of Buildings.

The project will be managed by Mayor Vincent DeSantis, an Attorney and a former Gloversville City Judge at New York State Unified Court System, has over 30 years of experience as a public servant. As a public servant he has managed Gloversville $18M/yr. budget and developed a keen understanding of brownfields their impacts on residents, environmental concerns and revitalization issues. Mayor DeSantis who served as Project Director on a Brownfield Assessment grant will continue as Project Director and will be assisted by:

- Nick Zabawsky, of the Gloversville Community Development Agency (GCDA), who will serve as interim manager for the grant in the event of the mayor’s departure of until such time as the new Mayor is appointed. Nick Zabawsky has over 30 years of experience in redevelopment, project management, and grants--especially Community Development Block Grants and Economic and Housing Rehabilitation Loan programs.
- James Hannahs Gloversville Development Specialist, who chairs the BOA/LWRP Task Force will assist Mayor DeSantis as Technical Coordinators for Community Outreach including coordinating meeting, preparing materials and conducting the meeting. Mr. Hannahs has extensive knowledge of Gloversville and public outreach.
- Ms. Maryann Reppenhagen, Gloversville Deputy Commissioner of Finance will serve as Financial Director. Ms. Reppenhagen assisted with financial reporting on the previous Brownfield grant and has managed a wide range of grants (including US HUD CDBG and large foundation awards). Ms. Reppenhagen is familiar with federal accounting requirements and standards.

The proposed staff noted above has experience managing state and federal grants including a Brownfield Assessment Grant which was recently successfully completed (administrative close-out pending). Details of the City’s experience are provided in Section 4.b.i(1).

4.a. iv. Acquiring Additional Resources
Additional expertise and resources, such as contractors will be obtained through a competitive qualifications-based procurement process in compliance with the EPA’s “Professional Service” procurement process (2 CFR 200.317-326). Municipal services, such as the City’s attorney and treasurer are available, as necessary.
# 4.b. Past Performance and Accomplishments

## 4.b.i Currently Has or Previously Received an EPA Brownfields Grant
### Purpose and Accomplishments:

<table>
<thead>
<tr>
<th>Category and Site</th>
<th>EPA Funding and Type</th>
<th>Award Year (FY)</th>
<th>Use Of Funds</th>
<th>Fund Balance</th>
<th>Estimated Completion</th>
</tr>
</thead>
<tbody>
<tr>
<td>Community Wide Assessment</td>
<td>$300,000 Haz. Substance</td>
<td>2019</td>
<td>Identification, Inventory and Assessment of Sites</td>
<td>$2,065</td>
<td>January 2022</td>
</tr>
</tbody>
</table>

### 4.b.i.(1) Accomplishments

Under the grant, 25 Phase 1s, 2 Phase 2s, and community participation events were completed and reported on ACRES. Of note:

- Completed six outreach meetings to obtain public input, provide progress updates and respond to comments.
- Identified 168 abandoned, dilapidated, idle, and vacant industrial sites in Gloversville including 47 brownfields encompassing 128 acres.
- Wood & Hyde – Redevelopment of 6.2-acre former tannery as a DPW garage. Investment is $1.1M.
- 52 Church Street – Redevelopment of 2.9-acre former comer site as subsided housing. Investment is $22M; and;
- 129 South Main Street – environmental hazards have been addressed on this former gasoline station. Sale is pending for the redevelopment of the site as retail space in an underserved section of the City.

In addition to the ability to remove environmental barriers to site redevelopment the City gained the knowledge and confidence to tackle brownfields that have sat decaying for decades, and Gloversville’s Mayor has risen to become a champion of the process. In particular, the City has created a task force of local government, citizens, local property owners and community groups that have conducted six public outreach events where the task force was educated on the brownfield process and community outreach, and input was obtained. The City is so invigorated by the brownfield process that outside the brownfield funding the City has become part of a Mohawk Valley Brownfield Developer Summit to attract developers to the brownfield sites. In addition, as part of the process to attract developers the City has utilized other funding to develop brownfield property information sheets that are included on a website and distributed to developers. In addition, the City is utilizing LWRP and BOA funding to complete in depth site development plans and marketing feasibility studies on several selected sites including Tradition Leather and Wood and Hyde.

### 4.b.i.(2) Compliance with Grant Requirements

90% of the previous grant was spent on completing the brownfield inventory, 25 Phase 1s, 2 Phase 2s and public outreach. Gloversville has consistently met its work plan and cooperative agreement requirements and ensured timely achievement of results through effective management of project environmental professionals, budgets, and schedules. The grants/budget coordinator monitors compliance with cooperative agreements, work plans, financial budgets, environmental outputs, and deliverables, and helps assemble data. Site approval requests were submitted on a timely basis. Actual work plan outputs, schedules, and key results were compared against work plan estimates and are reported on a timely basis. Quarterly progress reporting and annual financial reports are up to date and have been completed in a timely manner. The City's quarterly reporting routinely links progress toward achieving grant output goals, for example, numbers of site assessments completed, to actual performance. The City has communicated progress and accomplishments to both its EPA Region 2 Project Officer as well as through the EPA ACRES program as required. Several parameters are calculated including program demand, efficiency, costs, and results which are tracked and reported to the EPA. Gloversville's performance, including the completion of EPA-funded assessment and cleanup projects demonstrates that it is achieving the results expected. Due to the expected completion of the existing grant by November 2021, the new grant is needed to maintain and leverage the accomplishments.
Threshold Criteria Response
The City of Gloversville: Risedorph Tannery
Threshold Criteria Response - Brownfield Cleanup Grant

1. Statement of applicant eligibility as a City
   The City of Gloversville is eligible for funding as a general-purpose unit of local government.

2. Previously Awarded Cleanup Grants
   The site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant funds – Does not apply

4. Site Ownership – Deed- included in attachments

5. Basic Site Information – Risedorph Leather Tannery
   130-146 West Eighth Street
   Gloversville, NY 12078
   Owner of Site: City of Gloversville, NY

6. Status and History of Contamination at the Site:
   a. This site is contaminated by hazardous substances

   b. The operational history and current uses of the site: Risedorph Leather Tannery was used to de-hair, tan, dye, and finish animal skins from the mid-1800s to the 1990s. The tanning and finishing of hides involve many processes, each of which utilizes chemicals and generates various liquid and solid waste streams. Chemicals and products used in these processes and identified at this location include mineral spirits, aerosols, degreaser, sulfuric acid, formic acid, nitrobenzene, tar, hydrogen peroxide, selenium, sodium hydroxide, methyl ethyl ketone, chromium, copper, lead magnesium, dyes, petroleum products, paints, and fungicides. During the early years of operation and prior to the establishment of wastewater treatment facilities in Gloversville, the liquid wastes generated in the various site processes were discharged directly to the tributary to the Cayadutta Creek along the southern wall of the main tannery building. In the late 1970s tanneries were mandated to construct and maintain wastewater pretreatment plants and monitoring stations. The pretreatment plant at Risedorph Leather began operation around 1980 with liquid waste being discharged to the Gloversville municipal sewer system. In the late 1980s, Risedorph Leather shut down operations. The site was transferred to Feuer Leather Group, Inc who used the site for leather storage with no active tanning activities. The leather storage operations ceased in the late 1990s and the site was
abandoned. The City took title of the property (via delinquent taxes) in March of 2000 from the Feuer Leather Group, Inc. From 2002 to the present, the City of Gloversville currently uses part of the site for the Department of Public Works vehicle and equipment storage.

c. Environmental concerns if known at the site: Site Investigations have determined that surface soils (less than two inches below the vegetative cover), subsurface soils (greater than two inches below the ground surface), groundwater, and sediment (within lower pond and stormwater collection system) are contaminated with Semi-Volatile Organics (SVOCs) and metals.

d. How the site became contaminated, and to the extent possible, describe the nature and extent of contamination:

Contamination of soils and groundwater are associated with the historical release of tannery chemicals and wastes to the ground. While contamination of sediment is caused by run-off from contaminated surficial soils that enter the stormwater system and are discharged to the lower pond eventually entering Caycautta Creek. Current exposure pathways include direct contact with and ingestion of soils contaminated with heavy metals, by persons accessing the site. In addition, dust generated from these soils could result in an inhalation exposure pathway. The site is partially fenced to restrict access to the property, but evidence of trespassing exists. Exposures could occur via contact with contaminated sediments in the lower pond and creek.

7. Brownfields Site Definition: To be eligible for Brownfields Grant Funding, sites must meet the definition of a brownfield under CERCLA 101 (39) as described in the Information on Eligibility for Brownfields Funding under CERCLA 104(k)

   a. Site is not listed or proposed for listing on the National Priorities List – N/A
   b. Or judicial consent decrees issued to or entered into by parties under CERCLA – N/A
   c. Not subject to jurisdiction, custody, or control of the US government – N/A

8. Environmental Assessment Required for Cleanup Grant Applications:

   a. Describe the type of environmental assessment conducted: Phase II
   b. And provide the date is was conducted: September 2001, revised Sept. 2004, and revised again August 2006

9. Enforcement or Other Actions – N/A

There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

10. Sites Requiring a Property Specific Determination – N/A

11. Threshold Criteria Related to CERCLA/Petroleum Liability

   a. Property Ownership Eligibility – Hazardous Substance Sites

      i. EXEMPTIONS TO CERCLA LIABILITY

         1. Indian Tribes – N/A
         2. Alaska Native Village Corp. and Alaska Native Regional Corps. N/A
         3. Property Acquired Under Certain Circumstances by Units of State and Local Government
(a) Describe in detail the circumstances under which the property was acquired.

The city of Gloversville instituted a tax foreclosure proceeding. On September 10, 1999, the City filed with the City Clerk a list of delinquent taxes, as required by Section 1122 of the New York Real property Tax Law. On November 29, 1999, the City filed a notice of petition of tax foreclosure, which initiated a 90-day redemption period. The City acquired the property on March 14, 2000.

(b) Provide the date on which the property was acquired:

March 14, 2000

(c) Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.

All disposal of hazardous substances at the site occurred prior to City of Gloversville acquiring ownership.

(d) Affirm that you have not caused or contributed to any release of hazardous substances at the site.

The City of Gloversville did not cause or contribute to the release of hazardous materials at the site.

(e) Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

The City of Gloversville did not at any time, arrange for the disposal of hazardous substances at the site or transported hazardous substances to the site.
i. Exceptions to Meeting the requirements for asserting an Affirmative Defense to CERCLA Liability – N/A

ii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY – N/A

12. Cleanup Authority and Oversight Structure

a. Describe how you will oversee the cleanup at the site.

The site is included within the NYSDEC’s Environmental Restoration Program (site #B00150). The NYSDEC ERP is open to municipalities for the NYSDEC to oversee site investigation and clean-up.

b. Off-site cleanup activities

Based on a review of site investigation the contamination does not extent off-site.

13. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives (ABCA)

A draft ABCA is attached.

b. Public Meeting

A public meeting was noted in local paper and conducted on November 23, 2021.

c. Submission of Community Notification Documents - (attached)

1. A copy the community notification, public comments, responses to public comments, summary of public meeting and meeting sign in sheet/participant list is attached.

14. Statutory Cost Share

a. Demonstrate how you will meet the required cost share, including the sources of the funding or services, as required for this cleanup grant.

The City maintains an Environmental Justice Fund of $250,000. $100,000 of that fund will be allocated as a cost share for this grant. This fund is intended for addressing unsightly areas, streetscape restoration (street tree canopy, lighting, curbs, sidewalks, bike lanes) and other improvements to publicly owned spaces.

b. Hardship Waiver Request is not being requested.

15. Waiver of the $500,000 Limit is not being requested.

16. Named Contractors and subrecipients:

The City of Gloversville has not procured a contractor or subrecipient.