



*Where People Come First*

**NARRATIVE INFORMATION SHEET**

1. **Applicant Identification:**  
 Springfield Medical Care Systems (SMCS) (dba North Star Health)  
 100 River Street  
 Springfield, VT 05156
  
2. **Funding Requested:**
  - a. *Grant type:* Single Site Cleanup
  - b. *Federal Funds Requested:* \$1,890,000
  
3. **Location:**  
 Town of Springfield, Windsor County, State of Vermont
  
4. **Property Information:**  
 Edgar May Health and Recreation Center (EdgarMay)  
 140 Clinton Street, Springfield, VT 05156
  
5. **Contacts:**
  - a. *Project Director:* Joshua Dufresne, 802-886-8961, [jdufresne@northstarFQHC.org](mailto:jdufresne@northstarFQHC.org)  
 100 River Street, Springfield, VT 05156
  
  - b. *Chief Executive:* Joshua Dufresne, 802-886-8961, [jdufresne@northstarFQHC.org](mailto:jdufresne@northstarFQHC.org)  
 100 River Street, Springfield, VT 05156
  
6. **Population:**  
 Town of Springfield, Vermont has a population of 9,062 (US Census, 2020 Decennial Census).

7. **Other Factors:**

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	n/a

Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The proposed site(s) is in a federally designated flood plain.	n/a
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3, 4
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	3
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.	n/a

8. Releasing Copies of Applications:

No portions of this application are confidential, privileged, or sensitive in nature.

State of Vermont  
Department of Environmental Conservation  
Waste Management & Prevention Division  
1 National Life Drive – Davis 1  
Montpelier, VT 05620-3704  
(802) 828-1138  
[sarah.bartlett@vermont.gov](mailto:sarah.bartlett@vermont.gov)

October 24, 2023

North Star Health  
Attn: Josh Dufresne  
100 River Street  
Springfield, VT 05156

Dear Mr. Dufresne:

Please accept this letter as an acknowledgement that the Vermont Department of Environmental Conservation (VT DEC) has received notice that Springfield Medical Care Systems, Inc. (DBA North Star Health) intends to apply for a FY24 EPA Brownfields Cleanup Grant for the Edgar May Health and Recreation Center, located at 140 Clinton Street in Springfield, VT.

VT DEC affirms that the Edgar May property is currently listed with the Sites Management Section (SMS) voluntary response program as hazardous site #2009-3906, and has been enrolled in the state Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) program since October 16, 2012. The site has been sufficiently characterized to allow for the development of a Corrective Action Plan (CAP) intended to address environmental and human health risks related to the presence of PCBs in building materials, PAHs and PCBs in soil, and benzene in soil gas. Following a 30-day public comment period, the CAP was approved for implementation by VT DEC on February 28, 2022.

VT DEC is appreciative of your intent to support brownfield cleanup and redevelopment in Vermont. Please know that VT DEC is here to support your organization with the cleanup activities at this property, and we look forward to continued collaboration with Springfield Medical Care Systems, Inc. as you progress in your cleanup activities.

Best of luck in the competition.

Sincerely,



Sarah Palmer Bartlett  
Brownfields Program Coordinator  
Sites Management Section/Waste Management & Prevention Division

CC: Annemarie Fortune – Stone Environmental, Inc.  
Dorrie Paar – USEPA



**NARRATIVE**

**1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION**

**a. Target Area and Brownfields**

**i. Overview of Brownfield Challenges and Description of Target Area**

The Proposed Brownfield Site is located within a federally designated Opportunity Zone along the Black River on Clinton Street in the Town of Springfield, Vermont. Springfield became known for its critical global role in precision parts manufacturing, however, by the end of the 20<sup>th</sup> century, five of the six machine manufacturing plants had shuttered their doors. Springfield went from a community with the highest per capita income in Vermont to one that was burdened by high unemployment and over 790,000 square feet of vacant manufacturing space, all located within or near downtown and residential neighborhoods. According to the ACRES database, there are nine brownfield sites in Springfield, one Superfund NPL site, 46 underground storage tank sites, ten active RCRA hazardous waste sites, and 107 inactive RCRA hazardous waste sites. Compounded by the challenges of being a rural community with a population of approximately 9,000, many of the legacy brownfields have lain vacant for the past three to four decades with complex contamination challenges that have hindered the Town's opportunities for economic development. This economic stagnation impacts the town's population trends and well-being, including a decrease in the working-age population.

The Target Area is known as the industrial corridor along Clinton Street that stretches just under one mile from the Springfield Water and Sewer Treatment Plant to Main Street. In this short corridor, the Vermont Natural Resources Atlas identifies twelve hazardous waste sites and five hazardous waste generators. The Target Area, including the Proposed Brownfield Site subject of this application, abuts the Black River. Prior assessments of adjacent properties have identified threats of leaching contaminants into the river. A recent 2022 soil survey study along Clinton Street identified PAH-contaminated urban fill soils, coal tar contaminated soil, and VOC-contaminated soil vapor. The Target Area's contamination has prevented public access to the river as the land also acts as an impasse to the Toonerville Rail-Trail, which abruptly stops as it approaches the industrial district. Additionally, the blighted buildings have attracted trespassers, illicit drug use, and vandalism.

This EPA Clean-Up funding will play a vital role in supporting the redevelopment of a community hub that will provide services to the region. This will spur additional investment in the Target Area, supporting Springfield's economic development goals and enable the reconnection to the Black River.

**ii. Description of the Proposed Brownfield Site**

The Priority Brownfield Site is a 1.6-acre triangular parcel located at 140 Clinton Street in Springfield, Vermont owned by Springfield Medical Care Systems, Inc. (SMCS), a federally qualified health center (FQHC). The Site is bordered by the Black River. The Site includes an industrial building (Plant #4) on the southern side of the site totaling 19,915 square feet and a smaller annex added to the west side of building in the early 1920s. Past land use at the Plant #4 building includes over 50 years of manufacturing use including founding, machining, and painting of machine parts. Operations within the former Plant #4 building ceased in 1966, after which the building has sat largely unused; presently building access is restricted.

Extensive environmental assessments have been conducted on the Site with the support of private, regional, and state funds. These assessments have identified PCBs in Plant #4 building materials that require remediation in accordance with EPA Toxic Substances Control Act (TSCA) regulations. Specifically, PCB contamination is widespread in the building slab, interior paint, and lubricating oils associated with a gantry crane that spans the building. Additional known environmental concerns include PCB and PAH contaminated exterior soil, PAH contaminated groundwater, and benzene contaminated groundwater and soil gas.

Also onsite is the Edgar May Health and Recreation Center (EdgarMay), which SMCS leases to the EdgarMay. The Center is a community asset with an outdoor rock wall, swimming and therapy pools, and

FY24 Brownfield Cleanup Grant

Edgar May Health and Recreation Center – 140 Clinton Street, Springfield, Vermont

exercise space. Constructed in 2006, the facility marks a milestone in the cleanup of the Target Site, including off-site disposal and on-site encapsulation of PAH and metal contaminated soils, and development of a recreation center; this showcases community support and investment in the Site and success implementing environmental remediation and redevelopment.

## **b. Revitalization of the Target Area**

### **i. Reuse Strategy and Alignment with Revitalization Plans**

The Target Site will be redeveloped to expand medical, childcare, and recreational services in a centralized facility and will serve as a regional service and program hub intended for people of all incomes and ages. The historic Plant #4 building will be remediated, renovated, and adapted as an open-concept recreation center including an indoor turf field, second-story walking loop, basketball and pickleball courts, and an indoor rock-climbing wall. In place of the annex, which will be demolished, will be a newly constructed 13,400 square foot addition connecting Plant #4 and the existing recreation center that includes two multipurpose rooms for community health and wellness activities, a lifestyle medicine consultation room for the FQHC to holistically address patient health, and a licensed childcare facility that will provide 32 new child-care spots for infants, toddlers, and preschoolers.

The reuse vision was developed in partnership with a diversity of community partners. This included a member survey to identify desired uses, multiple community meetings and working groups to explore topics further with the broader community, and discussions with community leaders on program-specific topics like childcare. The reuse strategy also directly reflects needs identified in North Star and Springfield Hospital's 2022 Community Health Needs Assessment which surveyed the public and community leaders. The community identified recreation and fitness programs, biking and walking paths, and programs to address body weight as top services residents would utilize if they were made available. Moreover, nearly half (47%) of respondents identified affordable, high-quality childcare as a priority use. The survey also identified the cost of health care services and prescription drugs among the greatest issues facing the community, highlighting the need for preventative strategies to improve mental and physical health.

The EdgarMay is explicitly identified as an important community site within both the Springfield Town Plan and Downtown Master Plan. Reuse plans align directly with the Springfield Town Plan, supporting recreational, health, environmental, economic development, and education objectives and goals. Specifically, the revitalization plan aligns with stated objectives including but not limited to: increasing recreational access to trails; increasing youth recreation programming; expanding recreational opportunities and facilities in town; encouraging a town-wide approach to childcare and early education; and promoting partnerships that facilitate year-round community health, wellness, prevention and early intervention activities for all ages and abilities. Moreover, the Plan explicitly identifies the redevelopment challenges of the town's former machine tool sites and acknowledges their reuse is a critical factor in supporting economic development within the community.

### **ii. Outcomes and Benefits of Reuse Strategy**

The project will result in expanded recreational services and facilities, overseen by a trusted community-based organization including an anticipated 40% increase in usage of the facility, 13 additional fitness classes per week, opportunities to serve youth and adult sports leagues, an indoor walking track to allow seniors a safe space to walk year-round, and additional capacity to serve after-school and summer youth programming. It will also support economic development through the creation of eight full-time childcare worker positions and 32 childcare slots. The Learning Policy Institute estimates that for every dollar invested in early education, there is roughly a \$7.30 return leading to transformational economic impacts and increased economic mobility of town residents. This project will do so by:

- Creating eight jobs directly through the creation of a licensed childcare facility. Childcare also indirectly creates jobs in related industries such as commercial cleaning, food services, and education.
- Raising per capita income: The Center for Economic Development found that investment in childcare is associated with labor force participation and attachment in both men and women but is most impactful

FY24 Brownfield Cleanup Grant

Edgar May Health and Recreation Center – 140 Clinton Street, Springfield, Vermont

for women and women with children under 5, resulting in increased income. They also report that access to affordable childcare supports parents seeking additional education and training, also contributing to higher earnings over an individual’s lifetime.

- Lowering poverty in the region: Quality early childhood education provided through childcare programs lays the foundation for children's development, leading to better academic performance, improved social and emotional skills, and higher future earning potential. Harvard University’s Center on the Developing Child cites three long-term studies that found a range of returns between \$4 to \$9 for every dollar invested in early learning programs for low-income children. This includes not only increases in individual earnings but also benefits to the public including reduced special education, welfare, and crime costs and increased tax revenue from program participants later in life.
- Lowering regional outmigration rates: Childcare is proven to enhance the appeal of a region as a place to live and work, attracting skilled professionals and reducing the risk of talent drain to other regions. The project will also address local climate mitigation as the facility will result in the expansion of an existing solar array to produce onsite, clean energy; moreover, it is located directly adjacent to a public transit station and will include connection to a regional bike bath; combined with the co-location of a diversity of services, patron trips between healthcare and recreational facilities are expected to be reduced. The facility will also promote community resilience by creating indoor recreation space that provide alternative recreation options as extreme weather events and warmer temperatures become more frequent; this is particularly important for the vulnerable populations like children and older adults that are target audiences for the space.

**1.c. Strategy for Leveraging Resources**

i-iii. Resources Needed for Site Characterization, Remediation, and Reuse

The table below outlines identified and leveraged funding sources to support the redevelopment. The subject grant proposal is anticipated to fill the remaining funding gap necessary to fully implement the state-approved Corrective Action Plan (CAP).

<b>Name of Resource</b>	<b>Activity</b>	<b>Status</b>	<b>Additional Details</b>
VT DEC Brownfields Financial Assistance	Assessment	Identified	Not anticipated to be a need; supportive of project.
MARC’s Brownfield Reuse Program	Assessment	Identified	Not anticipated to be a need; have supported the project in the past and is invested its success as a named project partner.
ACCD Brownfield Revitalization Fund	Remediation	Secured	Attachment A -\$1,223,305 to support partial implementation of the approved CAP.
MARC EPA RLF	Remediation	Identified	Not anticipated to be a need but they have expressed support for use of their funds if needed.
USDA Community Facilities Grant	Reuse	Identified	Construct/improve essential community facilities, purchase equipment; anticipated Dec. ’23.
Vermont Community Development Program	Reuse	Identified	Economic development and public services; includes rehabilitation of public facilities and childcare; anticipated winter ’24.
Multiplan Rural Health Grant	Reuse	Identified	Introduce and expand services and programming in rural areas; anticipated summer ’24.
Community Revitalization and Response Program	Reuse	Identified	Capital improvement costs related to renovation/creation of childcare; rolling.

NBRC Catalyst Program	Reuse	Identified	Construction for community infrastructure projects; anticipated summer '24.
EdgarMay capital campaign	Reuse	Identified	In progress.
Identified private foundations	Reuse	Identified	In progress.
Congressionally directed spending request	Reuse	Identified	Anticipated spring '24.

iv. Use of Existing Infrastructure

Existing water, sewer, electricity, and internet services at the Proposed Brownfield Site are of adequate capacity to serve the proposed use. Reuse plans include the renovation of the existing Plant #4 Building, helping to preserve building materials onsite. The revitalization plans include expanding the solar array. Moreover, the site is located directly adjacent to a public bus stop; the site design includes a pedestrian trail intending to eventually connect to a regional trail.

**2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

**a. Community Need**

i. The Community’s Need for Funding.

Springfield is a federally designated Opportunity Zone. Being a small, rural town with a population of 9,062, Springfield faces challenges with population decline (9.9% decrease in working age population over the last decade), limited available public financing, and struggles to attract private investment. Public and private financing is limited due to low tax base, high poverty rates, high unemployment, and low household median income (table below). This is further exacerbated by an aging population, high rates of rental-burdened households, and high rates of people with disabilities.

<b>Indicator</b> (ACS, 2021 5-year estimates)	<b>Springfield</b>	<b>Vermont</b>	<b>United States</b>
Population	9,062	643,077	33,449,281
Senior Population (65+)	<b>23.5%</b>	19.5%	17.3%
Median Household Income	<b>\$52,160</b>	\$73,991	\$74,755
Poverty Rate	<b>17.0%</b>	10.4%	12.6%
Cost Burdened Households (rent ≥30% income)	<b>57.1%</b>	51.0%	51.9%
Unemployment Rate	<b>7.2%</b>	2.8%	4.3%
People with Disability	<b>23.7%</b>	13.8%	13.0%
Education (bachelor’s degree or higher)	<b>23.2%</b>	44.2%	35.7%
Percent change in median home value ('16 – '21)	<b>-2.0%</b>	9.9%	32.6%

*Bolded indicators notate distress factors above/below State and national averages.*

The financial burden and environmental complexity of the legacy brownfield sites within Springfield have limited opportunities for economic mobility and the town’s ability to make large financial investments in the Target Area. This funding will not only fill a gap to complete remediation activities at the Target Site but will showcase the ability of the project to attract both state and federal money that is integral to prove project readiness for redevelopment grants and to stimulate further investment in the Target Area.

ii. Threats to Sensitive Populations

*(1) Health or Welfare of Sensitive Populations*

As noted above, the Town of Springfield is among the most impoverished in the State; according to EPA’s EJScreen, the Target Area is in the 80-90% for low income and within the 95-100% for unemployment. With a poverty rate of 17% and a median household income of more than \$20,000 below the state and nation, Springfield’s population is extremely vulnerable to environmental exposures. Moreover, of those living in poverty, 27.2% are children under the age of 18. Nearly one quarter (24%) of residents are over 65 and this is expected to increase over the next decade. Both older adults and children are more vulnerable to environmental contaminants including those present at the Target Site (i.e., PCBs,

FY24 Brownfield Cleanup Grant

Edgar May Health and Recreation Center – 140 Clinton Street, Springfield, Vermont

PAHs, metals) as they have underdeveloped or compromised immune systems. Coupled with economic hardship, these populations are especially sensitive to the effects of contamination.

Springfield is also the subject of disinvestment. Most notably, while the country and Vermont's median home value rose significantly over the past five years, Springfield's median home value has decreased by 2.0%. Outmigration trends as Windsor County has seen a 9.9% decrease in working-age population over the past decade. Springfield's rental vacancy rate is more than double the State with a rate of 7% compared to 3.2%.

The removal and disposal of the contaminated materials will prevent future exposure to these populations and the greater community especially as the building falls greater into disrepair. The reuse plan will also serve sensitive populations. For one, expanding access to childcare is a proven strategy to promote economic opportunity to working parents, reduce outmigration and poverty rates, and increase household incomes; it also is associated with long term outcomes including reduced crime and increased tax revenue. Moreover, early childhood education is associated with greater lifelong earning potential and more positive educational performance. The expanded EdgarMay is built on an innovative multi-generational model with activities available to all ages to support community connectedness, health, and wellbeing with a particular emphasis on programming for children and older adults.

### *(2) Greater than Normal Incidence of Disease and Adverse Health Conditions*

The Town of Springfield has statistically significant higher rates of lung and bronchus cancer than the state of Vermont and Windsor County ranks in the top quartile of the state for lung disease as well as adults with cancer (VT DOH, 22). Moreover, according to the EPA EJScreen, the Target Area ranks in the 80-90% for both asthma and the 90-95% for persons with disabilities. Additionally, Springfield has a higher prevalence of arthritis, obesity, and diabetes than the State (VT DOH, 22). Mental health is also a concern within the community. The Springfield Hospital Service Area has higher rates of depressive disorder (22%) among adults as well as adults with poor mental health (18%), compared to the state (20%, 11% respectively) (VT BRFS). Research has shown the connection between poverty, economic opportunity, neighborhood blight, and mental health.

The Target Site presents an increased risk of exposure to the community through identified exposure pathways. The cleanup facilitated by this grant would remove exposure pathways to known contaminants and reduce the risk of disease and adverse health conditions. The reuse strategy also improves access to healthcare services, recreation opportunities, and adult and youth programming, ensuring that SMCS and EdgarMay can continue to address physical and mental health within the community.

### *(3)a. Environmental Justice - Identification of EJ Issues*

As described in the above sections, Springfield and Target Area residents experience high rates of low income and poverty and face a plethora of environmental challenges, making environmental justice a particular concern. The Town of Springfield is home to over 790,000 square feet of vacant manufacturing space, much of which has been assessed and contains known harmful contaminants including PCBs, asbestos, VOCs, SVOCs, and metals. Furthermore, the Old Springfield Landfill Superfund Site is sited within the Town. The Landfill once received hazardous industrial waste from the nearby industrial manufacturing sites now sitting vacant. The EPA identified VOC contamination of drinking water and an area spring associated with the Landfill. Moreover, according to EPA's EJScreen EJ Indexes, Springfield ranks in the 80-100% for lead paint, superfund proximity, RMP facility proximity, hazardous waste proximity, and underground storage tanks. Springfield is in the 98% for the state and the 92% for the country for toxicity-weighted concentration/distance for wastewater discharge indicators.

### *(3)b. Environmental Justice – Advancing EJ*

The proposed site reuse will promote environmental justice, particularly in the underserved populations of Springfield including those with low-income, in a variety of ways including by removing known, characterized hazardous chemicals located along a riverway and in a centrally located area of town. This will enable the expansion of an FQHC that serves the most vulnerable populations regardless of



FY24 Brownfield Cleanup Grant

Edgar May Health and Recreation Center – 140 Clinton Street, Springfield, Vermont

ability to pay, and expanding no-cost amenities such as swim classes, e-bike rentals, an walking track, and group fitness classes. Throughout the redevelopment process, there is commitment from a diversity of community partners, including SMCS and EdgarMay, to continue to engage the community to ensure the space truly reflects a multi-generational concept for the region and that those most impacted by Springfield’s legacy brownfields have a voice in its next iteration. Displacement of residents is not anticipated given the projected reuse as a community-based asset.

**b. Community Engagement**

i. & ii. Project Involvement & Project Roles

Collaborative partners and their respective roles are listed below in the table below. Given the broad reach of services within the redevelopment plan, SMCS and EdgarMay intend to partner and collaborate with a diversity of other stakeholders as the project progresses including the school district, youth sports leagues, and community-based organizations. Several key project stakeholders are outlined below:

<b>Organization</b>	<b>Point of contact</b>	<b>Roles and Involvement</b>
EdgarMay	Christian Craig, 802-885-2568 <a href="mailto:ccraig@edgarmay.org">ccraig@edgarmay.org</a>	Trusted community-based organization and recreation/programming provider. Activities: Community engagement and outreach; stakeholder/coalition coordination; redev. planning
MARC	Cindy Ingersoll, 802-674-9201 <a href="mailto:cingersoll@marcvt.org">cingersoll@marcvt.org</a>	Regional Planning Commission; oversees regional Brownfield Reuse Program Activities: Grant administration including reporting, record keeping, contracting and oversight, and accounting support.
Town of Springfield	Jeff Mobus, 802-885-2104 <a href="mailto:tosmanager@vermontel.net">tosmanager@vermontel.net</a>	Assistance in local regulatory matters, redevelopment planning.
Springfield Regional Dev. Corp.	Bob Flint, 802-885-3061 <a href="mailto:bobf@springfielddevelopment.org">bobf@springfielddevelopment.org</a>	Regional economic dev. non-profit -Support with reuse planning; support leveraging funding
VT DEC	Kim Caldwell, 802-461-5857 <a href="mailto:Kimberly.calwell@vermont.gov">Kimberly.calwell@vermont.gov</a>	State regulatory agency - Technical support; regulatory guidance and review/approval.
Let’s Grow Kids	Rachel Hunter, 802-376-5722 <a href="mailto:rachel@letsgrowkids.org">rachel@letsgrowkids.org</a>	Community-based organization advocating for childcare success. Activities: Provide support and best practices for childcare facility.
Building Bright Futures	Dora Levinson, 802-365-1716 <a href="mailto:dlevinson@buildingbrightfutures.org">dlevinson@buildingbrightfutures.org</a>	Public private partnership charged with advancing child health. Activities: Provide technical assistance for youth/childcare programming.
Lincoln Street, Inc.	Bart Mair, 802-886-2883 <a href="mailto:bmair@lincolnstreetinc.org">bmair@lincolnstreetinc.org</a>	Community-based organization focused on supporting people with disabilities. Activities: Provide technical assistance the redevelopment of the site for those with disabilities.

iii. Incorporating Community Input

SMCS and EdgarMay will leverage existing communication channels including trusted community liaisons like front desk staff and program coordinators to regularly address community questions and provide timely updates. The EdgarMay will utilize organizational websites and the neighborhood web-forum to provide quarterly updates on the project and will promote timely opportunities for further input. Updates will increase in frequency during remediation activities so the public is aware of site activities. EdgarMay also hosts monthly Board Meetings that consist of community leaders. Based on need and interest, the Board will create working groups open to the public to explore topics like facilities planning during cleanup activities and programmatic elements like childcare; these groups will be conducive to both in-person and virtual participation. The Board will leverage the above referenced communication channels to advertise engagement opportunities to the broader public. The EdgarMay’s Executive Director

FY24 Brownfield Cleanup Grant

Edgar May Health and Recreation Center – 140 Clinton Street, Springfield, Vermont

will serve as a direct point of contact with the public and has longstanding relationships with many in the community. The ED will directly respond to community concerns and questions via in-person dialogue, email, and phone; concerns and questions will also inform neighborhood newsletter postings and website topics to ensure the community has transparent, timely information regarding project process.

### **3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

#### **a. Proposed Cleanup Plan**

The Site has a state-approved CAP and a risk-based cleanup plan under revision for approval by EPA TSCA. The current plan, which will be reexamined considering public input and further engagement, includes removal of all PCB-containing building materials at concentrations  $\geq 1.0$  mg/kg, with the exception of concrete in the Plant #4 basement. PCB remediation wastes will be disposed of according to concentrations at a Subtitle D landfill or landfill permitted to accept hazardous waste in accordance with 40 CFR §761.75. PAH and PCB contaminated exterior soil excavated during construction will be encapsulated on-site within the Plant #4 basement by an engineered barrier consisting of an indicator fabric, clean fill, and a new concrete slab will be completed in accordance with 40 CFR §761 Subpart O.

Utilizing leveraged funding, we anticipate completing the most urgent activities within the approved CAP in the summer of 2024. This includes, the removal of Plant #4 building interior paint by media blasting and disposed of as a PCB bulk product waste in accordance with 40 CFR §761.62(b)(i); verification sampling of underlying materials will be completed; the decontamination of non-porous surfaces (e.g., the gantry crane) to remove PCB lubricating oils in accordance with 40 CFR §761 Subpart S and post-cleanup verification completed in accordance with 40 CFR §761 Subpart P; and the demolition of the annex portion of the Plant #4 building and associated building materials management according to their waste characteristics. Groundwater sampling will be conducted to determine whether long-term groundwater monitoring for PAHs is required or if monitoring wells can be closed in accordance with the Vermont Water Supply Rule. Subsequent cleanup verification sampling of underlying soil, remaining concrete machine bases will also be conducted with leveraged funds. EPA Cleanup funding will support the Plant #4 concrete slab removal and the installation of vapor barriers below the building slab of the addition and the new Plant #4 slab to mitigate the risk of vapor intrusion. SMCS will receive a Certificate of Completion as an enrollee Vermont’s Brownfields Reuse Environmental Liability Limitation Program that will serve as an institutional control, requiring that the engineered barriers and vapor barriers be maintained in perpetuity, routinely inspected, and repaired as necessary. A corrective action report will be written. All remediation plans have been reviewed and approved for historic preservation impacts by the Preservation Trust of Vermont.

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

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

<b>Task 1: Project Management</b>	<b>iii. Lead: SMCS; Assistance: MARC, EdgarMay, QEP</b>
<b>Non-EPA Funded (in-kind):</b> The SMCS PM will execute a cooperative agreement with MARC to manage the cleanup grant and oversee grant administration and with the EdgarMay to facilitate community engagement activities (Y1Q1).	
<b>EPA Funded:</b> MARC will prepare an RFP to identify and retain a QEP in accordance with organizational, state, and EPA procurement policies (Y1Q1-Q2). MARC will coordinate a project team that will meet quarterly throughout the project and will include SMCS and EdgarMay staff, the QEP, VT DEC, and EPA (Y1Q2-Y2Q2). MARC, with support from the QEP, will prepare quarterly progress reports and closeout documents within the ACRES database (Y1Q1-Y2Q2).	
<b>ii. Anticipated Project Schedule:</b> October 2024 – March 2026	
<b>iv. Outputs:</b> Two executed cooperative agreements, grant management oversight, RFB for QEP Services, one QEP contract, project team meetings, six quarterly reports, six ACRES database updates, and EPA closeout documents.	
<b>Task 2: Community Outreach</b>	<b>iii. Lead: EdgarMay Assistance: QEP</b>

**EPA Funded:** EdgarMay will develop a Community Involvement Plan (Y1Q1). The CIP will be implemented throughout the grant and will include regular project updates and response to community concerns in neighborhood newsletter and website posts (minimum quarterly) (Y1Q1-Y2Q2). A public meeting and comment period will accompany an updated ABCA and CAP (Y1Q2); responses to public comment will be posted on the project webpage. Working groups will be created, based upon need and as identified by the Project Team and the EdgarMay Board to discuss project specific issues and opportunities (Y1Q1-Y2Q3).

**ii. Anticipated Project Schedule:** October 2024 – March 2026

**iv. Outputs:** One Community Involvement Plan, working group meetings, sign-in sheets, and minutes; project webpage, six community newsletter updates, public comments received and responses.

**Task 3: Cleanup Planning**

**iii. Lead: QEP Assistance: MARC**

**EPA Funded:** The QEP will update the ABCA and CAP following public comment and finalization of reuse plans (Y1Q2). The QEP will submit the final CAP and ABCA to the VT DEC and EPA for review and approval (Y1Q2). The QEP, with support from MARC, will develop bid documents in compliance with organizational, state, and federal regulations and will hold a competitive bid process in accordance with EPA policies to identify appropriate subcontractors (Y1Q3). Contracts will be executed for cleanup implementation (Y1Q3).

**ii. Anticipated Project Schedule:** January 2025 – June 2025

**iv. Outputs:** One approved ABCA and CAP/Risk Based Cleanup Plan; bid documents; site walk; subcontractor contracts.

**Task 4: Cleanup Implementation**

**iii. Lead: QEP overseen by MARC**

**EPA Funded:** The QEP will oversee implementation of the outstanding activities within the approved CAP; site cleanup activities will be performed as described in section 3a and in accordance with the approved CAP and TSCA plans; MARC and the QEP will ensure compliance with state/federal standards (Y1Q3-Y2Q2). Upon completion a corrective action report will be prepared by the QEP (Y2Q1-Q3).

**ii. Anticipated Project Schedule:** June 2025 – March 2026

**iv. Outputs:** Installation of ~20,000 ft<sup>2</sup> vapor barrier and concrete slab and as-built drawings; removal of ~20,000 ft<sup>2</sup> contaminated concrete and waste manifests for disposal; One Certificate of Completion, one Corrective Action Construction Completion Report.

**b. Cost Estimates**

Budget Categories		Activity				Total
		Task 1	Task 2	Task 3	Task 4	
Direct Costs	Personnel	--	--		--	--
	Fringe Benefits	--	--		--	--
	Travel	--	--		--	--
	Equipment	--	--		--	--
	Supplies	--	--		--	--
	Contractual	\$25,000	\$20,000	\$30,000	\$215,000	<b>\$290,000</b>
	Construction	--	--	--	\$1,600,000	<b>\$1,600,000</b>
Total Direct Costs		\$25,000	\$20,000	\$30,000	\$1,815,000	<b>\$1,890,000</b>
Total Indirect Costs		--	--	--	--	--
<b>Total Budget</b>		<b>\$25,000</b>	<b>\$20,000</b>	<b>\$30,000</b>	<b>\$1,815,000</b>	<b>\$1,890,000</b>

**Task 1 – Project Management:** Contractual (MARC): assumes \$65/hour\*300 hours (administration of 3 contracts, assistance with procurement and contracting, Davis Bacon oversight, grant reporting, meetings) ≈ **\$20,000**; Contractual (QEP): assumes 2 staff virtually attend 6 project team meetings (avg. rate \$172\*12) + support with 6 ACRES updates/quarterly reports and closeout docs (\$164\*16 hrs.) = **\$5,000**

FY24 Brownfield Cleanup Grant

Edgar May Health and Recreation Center – 140 Clinton Street, Springfield, Vermont

**Task 2 Community Outreach:** Contractual (EdgarMay): assumes \$37.50/hour\*average of 20 hours/month/18 months + \$1,500 Community Involvement Plan = **\$15,000**; Contractual (QEP): assumes 2 staff attend public meeting + travel (avg. rate \$172\*10 hrs.); support preparing public meeting, project updates, CIP preparation (\$164\*16 hrs.) = **\$5,000**

**Task 3 -- Cleanup Planning:** Contractual (QEP): assumes \$179/hr\*40 hours to finalize ABCA and CAP; \$179/hr.\*120 hrs. contractor procurement including development of bid documents, site walk, evaluation of bids, subcontracting = **\$30,000**

**Task 4 -- Cleanup Implementation\*:** Contractual (QEP): assumes 10% markup on subcontracts (\$160,000); \$55,000 for QEP services and equipment to oversee concrete cutting and removal, concrete/vapor barrier installation, and develop Corrective Action Report = **\$215,000** (includes avg. rate \$149/hr.\*355 hrs. +equip./expenses); Construction (subs): assumes concrete cutting = \$1,000,000 (\$20,000 mobilization, ≈20,000 ft<sup>2</sup>, \$11-16/sqft<sup>2</sup> disposal = \$392-1,650/ton based on material/contamination, + additional contaminant, equipment costs) and \$600,000 vapor barrier and concrete installation (\$5,500 mobilization, 6” concrete slab \$1,527/CY\*314 CY + vapor barrier 3.65/ft<sup>2</sup>\*17,000) =**\$1,600,000**. \*costs derived from ‘21 CAP details/costs updated to reflect current cost.

#### **d. Plan to Measure and Evaluate Environmental Progress and Results**

MARC will track, measure, and report project outputs and performance through quarterly reports and timely updates to the ACRES database. The project team will meet at least quarterly to track the project’s progress towards completing tasks and outputs described in the table above. Quarterly reports submitted to the EPA will include project expenditures and progress on the approved work plan. If necessary, the project team will take corrective actions to ensure the project is meeting budget, schedule, and scope requirements as dictated in the work plan. With support from the QEP, other outcomes such as elimination of health and environmental hazards and square footage of remediated property will also be tracked. In addition, the EdgarMay will track leveraged redevelopment funding; eventually, the EdgarMay and NorthStar will track square footage of new facilities, number of new programs/classes, increase in membership, number of patients served, number of jobs created, and number of children served by the childcare facility.

### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

#### **a. Programmatic Capability**

##### **i. Organizational Structure**

SMCS employs 225 staff with a portfolio of accounting, public outreach, business development, and programmatic expertise. SMCS will utilize the same proven organization structure which has led to the success of our recent independence as a standalone FQHC and the management of our various federal, state, and local grant work. The team-based workflow has proven successful grant implementation and management for federal, state, and local grants which happen either independently or with the cooperation with other entities. SMCS’ financial team has extensive knowledge of federal grants, and the federal grant program process; financials are reviewed internally by our finance team who use generally accepted accounting principles, by the North Star Finance Committee, and by the full Board of Directors of North Star Health. In addition, our financials are reviewed annually by an independent auditing firm, which includes federal grant management and reporting.

##### **ii. Description of Key Staff**

The CEO, Joshua Dufresne, MBA, has nearly 15 years of health care administration, with more than eight at the executive level. He is a seasoned health care executive who has guided consistent demonstrable accomplishments in underserved rural areas. Joshua has been instrumental in applying for and being awarded with various capital grants to expand/renovate spaces within the SMCS Network. Andy Majka, CFO, has more than twenty years of experience in health care financial management including CEO duties of the FQHC in years past, health care auditing, and CFO roles within both hospitals and other FQHCs.

## FY24 Brownfield Cleanup Grant

Edgar May Health and Recreation Center – 140 Clinton Street, Springfield, Vermont

Andy has managed multiple grants from the financial aspect which have enhanced patient access, renovation, and new construction. Katrina Taylor, DO, serves as our CMO. Dr. Taylor has worked within the Springfield system for more than 14 years. She has expertise in policy and procedure. Lori Twombly, MSHA is the SMCS COO. This position is the “right-hand” to the CEO in terms of the day-to-day operations. Mrs. Twombly is an experienced practice manager and has contributed to SMCS’ success.

### iii. Acquiring Additional Resources

SMCS plans to work closely with MARC to administer this grant. Cindy Ingersoll (MARC) has over five years’ experience managing complex EPA projects, including brownfield sites. MARC will help to create a work plan and financial workflows to ensure project completion. MARC is well-versed in the procurement of qualified environmental professionals and contractors and all State and Federal requirements, including Davis Bacon to promote equitable labor practices, and has strong relationships with local contractors to promote Vermont-based companies. Through MARC’s Brownfield Program, staff have established relationships with QEPs, the VT DEC, and EPA to ensure proper administration of EPA brownfields funding. MARC will provide technical expertise and guidance to ensure the successful planning and implementation of all site remediation activities that meet both State and Federal requirements. The EdgarMay has vast knowledge and experience in planning for sustainable programming and facilities planning. EdgarMay is instrumental in developing reuse plans and has previously engaged an architecture firm and the Preservation Trust of Vermont to develop cost estimates and ensure compliance with historic preservation requirements. EdgarMay has strong relationships with the community and partners to support community engagement activities.

### **b. Past Performance and Accomplishments**

#### ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

##### *(1) Purpose and Accomplishments*

Every three years, SMCS is required to file a Service Area Competition with Health Resources and Services Administration (HRSA), which directly informs 303 funding. Over the past 13 years, SMCS has successfully secured and managed these awards with an annual budget of two to three million dollars. SMCS was recently awarded the following funds: Coronavirus Supplemental Funding for Health Centers (\$70,452); Health Center Coronavirus Aid, Relief, and Economic Security (CARES) Act Funding (\$1,010,015); FY2020 Expanding Capacity for Coronavirus Testing (ECT) (\$531,634); American Rescue Plan Act for Health Centers (\$4,637,875); and Health Center Infrastructure Support (\$817,757). These funds were to expand COVID-19 testing, stabilize the workforce, and renovate existing space to include negative air pressure rooms for COVID-19 patient care. Major accomplishments for these grants include the investment in negative air pressure rooms at two health center locations, a mobile medical unit to provide care where patients need it most, and payroll stability.

SMCS also received a large capital grant to renovate a brownfield site, 100 River Street, and transform it into a state-of-the-art primary care building. During this time, SMCS leadership worked closely with the Vermont and federal historic preservation teams, to ensure that renovations kept the historic character of the building and helped to cleanup of the site. Since, SMCS has been awarded over \$800,000 to renovate the property and move medical services into this property creating greater access to care.

##### *(2) Compliance with Grant Requirements*

SMCS has an excellent track record complying with grant workplans, schedules, and reporting requirements. For the grants described above, HRSA required quarterly updates regarding spending, barriers, and changes with no faults during this reporting period. To ensure compliance, SMCS works with a project team that meets weekly and uses an agreed upon timeline for project tasks; communication is a priority outside of the meetings and with the funding agency to ensure buy-in on the scope of the project and any necessary changes.

## **ATTACHMENT B. THRESHOLD CRITERIA RESPONSES**

### **1. Applicant Eligibility**

Springfield Medical Care Systems, Inc. (dba North Star Health) is a 501(C)(3) nonprofit organization founded in 1982. See Attachment C. Springfield Medical Care Systems is not exempt from Federal taxation under section 501(c)(4).

### **2. Previously Awarded Cleanup Grants**

Springfield Medical Care Systems, Inc. has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

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

Springfield Medical Care Systems, Inc. does not have an open EPA Brownfields Multipurpose Grant.

### **4. Site Ownership**

Springfield Medical Care Systems, Inc. is the sole owner of the subject site under fee simple title.

### **5. Basic Site Information**

- a. *Site Name:* Edgar May Health and Recreation Center (EdgarMay)
- b. *Address:* 140 Clinton Street, Springfield, Vermont 05156
- c. *Current Owner:* Springfield Medical Care Systems, Inc.

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

- a. *Contamination:* Previous environmental assessments of the Site identified polychlorinated biphenyls (PCBs) in Plant #4 building materials that require remediation in accordance with EPA TSCA regulations. Specifically, PCB contamination is widespread in the building slab, PCBs are ubiquitous in paint applied to all interior surfaces and present a risk of an ongoing release from lubricating oils associated with a gantry crane that spans the Plant #4 building. Additional known environmental concerns include PCB and polycyclic aromatic hydrocarbon (PAH) contaminated exterior soil, PAH contaminated groundwater, and benzene contaminated groundwater and soil gas.
- b. *Operational History and Current Use:* Past land use at the Site includes over 50 years of use for various components of foundering by multiple companies, including the Vermont Snath Company and Vermont Foundries, Inc. (an entity formerly owned by the Fellows Gear Shaper and Jones & Lamson companies). Activities within the former Plant #4 building began with cleaning of cast parts forged at the main foundry using air-powered die grinders. This use evolved to include machining and painting of parts prior to distribution to local machine shops. Operations within the former Plant #4 building ceased in 1966, after which the building sat largely unused until it was donated to the Southern Health and Recreation Center Foundation (SHRCF) in 1985 by Stanley Patch, the owner at that time. The EdgarMay periodically hosted events, such as the First Night Road Running Race, within the former Plant #4 building until contamination was identified in 2010 and access was restricted and remains restricted.

- The Site was purchased by Springfield Medical Care Systems, in October 2012 and leases operations of the EdgarMay. The EdgarMay building is in operation as a recreation facility that serves the surrounding community with swimming and therapy pools, exercise rooms, and associated facilities. The portion of the Site that is currently occupied by the recreation center was previously the home of the main foundry before these operations were moved to a plant located north of the Black River. Activities on the site include rock-climbing programming, open swim and swim lessons, and fitness facility.
- c. *Environmental Concerns:* Previous environmental assessments of the Site identified PCBs in Plant #4 building materials that require remediation in accordance with EPA TSCA regulations. Specifically, PCB contamination is widespread in the building slab, PCBs are ubiquitous in paint applied to all interior surfaces and are present in lubricating oils associated with a gantry crane that spans the Plant #4 building that poses an ongoing risk of release. Additional known environmental concerns include PCB and polycyclic aromatic hydrocarbon (PAH) contaminated soil between the Plant #4 and EdgarMay building, PAH contaminated groundwater, and benzene contaminated groundwater and soil gas.

The following exposure pathways are present onsite posing risk to public health and the environment:

- Direct contact with PCB contaminated building materials,
  - Direct contact with PAH and PCB contaminated soil,
  - Vapor intrusion of benzene into the Plant #4 building following renovations, and
  - PAH groundwater quality at the downgradient property boundary.
- d. *How the Site Became Contaminated and Nature/Extent of Contamination:* Historic industrial practices at the site included use of PCB-containing oils. Machining cutting oils containing PCBs were released to the concrete slab. Oils associated with a large gantry crane also contain PCBs and have contributed to the spread of PCBs to metal surfaces and the underlying slab from incidental leaks. PCB contamination is prevalent across the entire slab with higher concentrations are found near machine bases where cutting oils were in use and below the gantry crane. PCBs were also used as plasticizers in paint that has been applied to interior surfaces of the Plant #4 building.

PAH soil contamination is likely due to combination of several sources including the location of the site in an urban environment, past industrial uses of the site, and importation of contaminated fill. Limited remedy west of the EdgarMay was performed in 2014 to address PAHs in exterior soils. Limited PAH contamination is also present in groundwater. Benzene contaminated groundwater is present in the eastern portion of the property near the Plant #4 building and is likely migrating from an upgradient property that formerly operated as a retail gasoline filling station. Benzene in groundwater is likely the source of benzene soil gas contamination that is limited to below the Plant #4 building at concentrations that warrant remedial actions for the proposed use.

## 7. Brownfields Site Definition

- a. The subject site is not listed or proposed for listing on the National Priorities List (NPL).

- b. The subject site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
- c. The subject site is not subject to the jurisdiction, custody, or control of the U.S. government.

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

Environmental assessments conducted at the site since 2000 are listed below and have revealed the presence of PCBs in the concrete slab from releases of machining and lubricating oils, PCBs in interior paint, and PCB containing lubricating oils contaminating non-porous surfaces.

- Soil sampling results provided to Edgar May, Southern Vermont Recreation Center Foundation in a letter titled “Former Foundry Building – Springfield, Vermont”, prepared by Dufresne and Henry, Inc., October 27, 2000.
- “Sampling of Soil Stockpile, Former J&L Property, Clinton and Bridge Streets, Springfield, Vermont, Soils from the So. VT Recreation Center Property”, Letter to Trish Coppolino, Vermont Department of Environmental Conservation, prepared by M&W Soils Engineering, Inc., November 9, 2007.
- “Phase I Environmental Site Assessment Report, Edgar May Health and Recreation Center, 140 Clinton Street, Springfield, Vermont, SMS #2009-3906,” prepared by Stone Environmental, Inc. August 2009 (ASTM E1527-05)
- “Phase II Environmental Site Assessment Report, Edgar May Health and Recreation Center Draft Report, SMS #2009-3906, Springfield Vermont” prepared by Stone Environmental, Inc. July 2010 (ASTM E1903-11).
- “Supplemental Phase II Environmental Site Assessment Report, Edgar May Health and Recreation Center, Final Report, SMS #2009-3906, Springfield Vermont.” Prepared by Stone Environmental, Inc., December 2011 (ASTM E1903-11).
- “Corrective Action Feasibility Investigation Draft Report, SMS #2009-3906, Edgar May Health and Recreation Center, Springfield Vermont.” Prepared by Stone Environmental, Inc., December 2011.
- “Phase I Environmental Site Assessment Report, Edgar May Health and Recreation Center, 140 Clinton Street, Springfield, Vermont, SMS #2009-3906” prepared by Stone Environmental, Inc. December 2011 (ASTM E1527-05)
- “Phase I Environmental Site Assessment Report, Edgar May Health and Recreation Center, 140 Clinton Street, Springfield, Vermont” prepared by Stone Environmental, Inc. September 2012 (ASTM E1527-05)
- “Partial Corrective Action Plan, Edgar May Health and Recreation Center, SMS #2009-3906, 140 Clinton Street, Springfield Vermont.” Prepared by Stone Environmental, Inc., August 2013.
- “Remedial Action Report, Edgar May Health and Recreation Center, SMS #2009-3906, 140 Clinton Street, Springfield Vermont.” Prepared by Stone Environmental, Inc., October 2014.
- “Corrective Action Plan, Edgar May Health and Recreation Center, SMS #2009-3906, 140 Clinton Street, Springfield Vermont.” Prepared by Stone Environmental, Inc., February 2016.
- “Site Investigation Report: Edgar May Health and Recreation Center, 140 Clinton Street, Springfield, Vermont, SMS #2009-3906.” Prepared by Stone Environmental, Inc., December 2020,



- “Evaluation of Corrective Action Alternatives: Edgar May Health and Recreation Center, 140 Clinton Street, Springfield, Vermont, SMS #2009-3906.” Prepared by Stone Environmental, Inc., May 2021.
- “Corrective Action Plan/Risk-Based Cleanup Plan: Edgar May Health and Recreation Center, 140 Clinton Street, Springfield, Vermont, SMS #2009-3906.” Prepared by Stone Environmental, Inc., November 2021.
- “Analysis of Brownfield Cleanup Alternatives – Edgar May Health and Recreation Center, 140 Clinton Street, Springfield, Vermont.” Prepared by Stone Environmental, Inc., November 2021 in support of the FY22 Brownfield Cleanup Grant application

#### 9. **Site Characterization**

The site is eligible to be enrolled in the Vermont Brownfield Response Program, is currently enrolled, and has a sufficient level of site characterization for remediation work to begin. See Attachment D for a letter from the Vermont Department of Environmental Conservation.

#### 10. **Enforcement Other Actions**

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

#### 11. **Sites Requiring a Property-Specific Determination**

The site requires a Property-Specific Determination as there has been a release of PCBs and part of the property is subject to TSCA remediation. See Attachment E for Property-Specific Determination.

#### 12. **Threshold Criteria Related to CERCLA/Petroleum Liability**

SMCS asserts that we meet the Bona Fide Prospective Purchaser CERCLA Liability Protection. To demonstrate we meet the requirements please see details below:

- Information on Property Acquisition:* The subject property was deeded to Springfield Medical Care Systems on October 30, 2012 from the Southern Vermont Health and Recreation Foundation. Springfield Medical Care Systems has sole, fee simple, ownership of the site. Springfield Medical Care Systems leases operations of the facilities on the subject site to the EdgarMay.
- Pre-Purchase Inquiry:* AAI complaint (ASTM 1527-05) Phase I ESAs were completed by Stone Environmental, Inc., qualified environmental professionals as defined by AAI, for Southern Windsor County Regional Planning Commission (SWCRPC, now Mount Ascutney Regional Commission [MARC]) on behalf of Springfield Medical Care Systems on December 19, 2011 and September 24, 2012.
- Timing and/or Contribution Toward Hazardous Substances Disposal:* Springfield Medical Care Systems has not caused or contributed to the release of any hazardous substances at the site. Any disposal of hazardous substances on the subject Site occurred prior to SMCS acquiring the property. SMCS has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.
- Post-Acquisition Uses:* Following acquisition of the property, Springfield Medical Care Systems has leased the EdgarMay to the Southern Vermont Recreation Center Foundation and the EdgarMay for continued operation as a recreation center serving the

Springfield community. The Plant #4 building has remained vacant with access restricted since 2010. An outdoor climbing tower and turf field were constructed west of the EdgarMay building in 2021.

- e. *Continuing Obligations:* The risk of a threatened release of oil from the gantry crane was identified following purchase of the property. Polyethylene sheeting was installed on the floor below the crane to prevent additional releases of PCB contaminated oil to the slab. Access to the Plant #4 building was restricted to qualified personnel. In 2013, an engineered barrier was installed west of the EdgarMay building, in accordance with a VT DEC approved partial Corrective Action Plan, to prevent direct contact with PAH contaminated soils.

Springfield Medical Care Systems confirms and affirms its committed to:

- i. Complying with any land use restrictions and not impeding the effectiveness or integrity of any institutional controls;
- ii. Assisting and cooperating with those performing the cleanup and providing access to the property;
- iii. Complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- iv. Providing all legally required notices.

### 13. **Cleanup Authority and Oversight Structure**

The Vermont Department of Environmental Conservation (VT DEC) and EPA Region I PCB Coordinator will have authority and oversight of the cleanup activities. SMCS will comply with applicable local, state, and federal laws and regulations and ensure that the cleanup actions will be protective of human health and the environment. Cleanup activities will be completed in accordance with the VT DEC's Investigation and Remediation of Contaminated Properties Rule (IRule) and 40 CFR 761.61(c). Any technical expertise needed to support this cleanup within this award will be retained in a manner that complies with the competitive procurement provisions of 2 CFR 200.317 through 200.327, including a competitively bid process. A QEP will work with Springfield Medical Care Systems and Mount Ascutney Regional Commission to design, prepare specifications and bidding documents, oversee and document remediation activities at the site, as well as assist with the interface between the VT DEC, and EPA. The QEP will also assist with the competitive bid process for selecting the contractor(s) to perform the proposed cleanup actions. The QEP will be selected prior to initiating cleanup activities.

Previous environmental assessments have not identified contaminant migration from the property onto adjoining properties, therefore, access to neighboring properties is not anticipated. All adjoining property owners will be notified of the proposed cleanup activities in accordance with VT DEC IRule and will have an opportunity to provide comments during a 30-day public comment period.

### 14. **Community Notification**

EdgarMay, on behalf of Springfield Medical Care Systems, published and provided opportunities for the public to comment on both the ABCA and subject grant application published on October 17 and 18, 2023 in the Vermont Journal/The Shopper and the Springfield Reporter. Copies of the grant materials and ABCA were made available via an organizational webpage and in-person at

FY24 Brownfield Cleanup Grant

Edgar May Health and Recreation Center – 140 Clinton Street, Springfield, Vermont

the front desk of the Edgar May Health and Recreation Center. Moreover, we facilitated a community meeting to discuss the application and invite public comment on October 25, 2023; the meeting was available to in-person and virtual attendees. A copy of the draft ABCA, Community Notification, Summary of Comments Received and Responses to those Comments, Meeting Notes from the Public Meeting, and Meeting Sign-In sheet can be found in Attachments F-J.

**15. Contractors and Named Subrecipients**

Contractors have not been procured. The subject proposal includes Mount Ascutney Regional Commission and the Edgar May Health and Recreation Center as named Subrecipients. The subrecipients are eligible for a subaward as a unit of government and 501(C)(3) nonprofit organization, respectively.