

Community Relations Plan
Former Photec Imaging System
330 Cole Avenue
Williamstown, Massachusetts

The Town of Williamstown

March 2018



1550 Main Street
Suite 400
Springfield, MA 01103





FUSS & O'NEILL

March 20, 2018

Ms. Dorrie Paar
United States Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code OSRR07-2
Boston, MA 02109-3912

RE: Community Relations Plan
Town of Williamstown
Former Photec Imaging System
330 Cole Avenue
Williamstown, Massachusetts

Dear Ms. Paar:

On behalf of the Town of Williamstown, we are pleased to present the enclosed Community Relations Plan for the above-referenced site. The Community Relations Plan documented herein has been developed to present a framework to notify the public and solicit public involvement during the cleanup of the Former Photec Imaging System site.

Please contact us if you have any questions or require additional information.

Sincerely,

Timothy Clinton, CPG, LSP
Project Manager

/rlz

Attachment: Community Relations Plan

c: Mr. Andrew Groff, AICP, Williamstown Community Development Director

1550 Main Street
Suite 400
Springfield, MA
01103
t 413.452.0445
800.286.2469
f 413.846.0497

www.fando.com

Connecticut
Maine
Massachusetts
New Hampshire
Rhode Island
Vermont



Table of Contents

Community Relations Plan Former Photec Imaging System Town of Williamstown, Massachusetts

1	Introduction.....	1
2	Spokesperson and Information Repository.....	1
3	Site Description.....	2
3.1	Site Location.....	2
3.2	History of Site Use and Ownership.....	2
3.3	History of Environmental Assessment and Cleanup.....	2
3.4	Nature of Threat to Public Health and the Environment.....	3
4	Community Background.....	3
4.1	Community Profile and Project Goals.....	3
4.2	Chronology of Community Involvement.....	5
4.3	Results of Previous Community Involvement Efforts.....	5
4.4	Benefit to Targeted Community.....	5
5	Continued Community Involvement.....	6
5.1	Information Repository.....	6
5.2	ABCA Notification Process.....	6
5.3	On-Going Outreach Activities.....	7
6	Proposed Project Schedule	7

Table 1: Target Community Demographic Information

Page 4

Figure 1: Site Location Map

End of Text

1 Introduction

In May 2017, the Town of Williamstown (the Town) was selected for a \$200,000 Brownfields Cleanup Grant by the United States Environmental Protection Agency (USEPA) for the cleanup of the Former Photec Imaging property (the Site) in the Town of Williamstown, Massachusetts (the Town). In accordance with the Cooperative Agreement between the Town and USEPA, the Town is required to prepare a *Community Relations Plan* (CRP) that outlines the Town's plan for involving the public during the cleanup process.

The purpose of this CRP is to identify the communication strategies that will address the needs and concerns of the citizens of Williamstown and other project stakeholders, particularly residents who live in close proximity to the Site. This CRP describes how the Town has involved and will continue to involve Town officials, residents, nearby property owners, and pertinent Community-Based Organizations in the decision-making process regarding the environmental remediation efforts at the Site.

Active residents and local organizations in the community are essential resources for the success of the CRP. The Town perceives these citizens and organizations as key stakeholders and points of contact and communication. One measure of success of the cleanup project will be the involvement of well-informed citizens in the abatement process.

2 Spokesperson and Information Repository

The spokesperson for this project is Mr. Andrew Groff of the Town of Williamstown. His contact information is as follows:

Mr. Andrew Groff, AICP
Community Development Director
Town of Williamstown
31 North Street
Williamstown, MA 1267-2003
413-458-9344
AGroff@williamstownma.gov

Key documents prepared as part of this project will be available in the Information Repository. An Information Repository will be located in the Town's office at the above address. To conduct a review of the Information Repository, Mr. Groff should be contacted to make an appointment during normal business hours.

3 Site Description

3.1 Site Location

The Site consists of a single, 4.9-acre former industrial parcel located at 330 Cole Avenue in Williamstown, Massachusetts. The Site is currently occupied by a vacant 8,370 square foot former industrial building. A location map depicting the approximate location of the Site is included as *Figure 1*.

3.2 History of Site Use and Ownership

The Site is an approximately 4.9-acre former industrial parcel, initially developed circa 1865. The Site housed a series of textile mills until 1939, at which time it was purchased by a photographic film company. Manufacturing of photographic film products by a variety of companies continued at the Site until the most recent occupant, Photech Imaging Systems, vacated the Site in 1989. The Site has remained unoccupied since then. The Site was acquired by the Town via eminent domain in 2007.

3.3 History of Environmental Assessment and Cleanup

Numerous environmental response actions were conducted at the Site between 1993 and 2014. The investigations culminated in the preparation of a *Phase II Comprehensive Site Assessment and Class A-3 Response Action Outcome Statement*, which was prepared in May 2014 in accordance with the Massachusetts Contingency Plan (MCP). Previous investigations generally included advancement of soil borings, collection of soil and groundwater samples for laboratory analysis, and performance of a Method 3 Ecological Risk Assessment to evaluate potential impacts to the abutting Hoosic River.

The previous investigations documented the presence of soil at the Site containing heavy metals and polycyclic aromatic hydrocarbons (PAH) at concentrations greater than applicable regulatory standards. The metals concentrations in soil were attributed to past film manufacturing activities, whereas the PAH concentrations in soil were attributed to the historical application of fill materials. Additionally, discrete historical releases of petroleum degraded soil quality in the vicinity of former underground storage tanks (USTs).

In response to the documented environmental impacts at the Site, several cleanup response actions have been conducted to date. The completed cleanup response actions included the following:

- Excavation and off-site disposal of contaminated soil
- Removal of USTs
- Soil capping in areas deemed infeasible for excavation
- Implementation of an Activity and Use Limitation (AUL) to limit the types of residential activity that can occur at the Site

3.4 Nature of Threat to Public Health and the Environment

In October 2015, Fuss & O'Neill prepared a *Limited Hazardous Building Materials Inspection Report* regarding the Site building. The Brownfield Cleanup Grant awarded to the Town is intended to be used for abatement of the following building materials that were determined to contain greater than 1% asbestos included:

- Black tar under terra cotta floor tiles;
- Red glue under terra cotta base cove;
- Black tar on HVAC components;
- Black tar on cork pipe insulation
- Pipe insulation;
- Roofing materials;
- Glazing compounds;
- Boiler gaskets; and
- Tar compounds

Additionally, the following building components determined to contain levels of lead greater than 1.0 milligram per square centimeter (mg/cm²) will also be abated using the Cleanup Grant:

- Interior doors
- Interior door jambs
- Interior door casings

The foreseeable future use of the Site includes selective demolition of the existing building to prepare it for refurbishment as multi-unit housing. However, inhalation and/or ingestion of the above-listed hazardous building materials have the potential to impact the health of human receptors. Therefore, proper abatement of these hazardous materials, prior to demolition, is necessary to protect both construction workers and neighboring residents during demolition, as well as future residential occupants of the existing building.

4 Community Background

4.1 Community Profile and Project Goals

Williamstown is a rural community located in northwest Massachusetts. From the time of settlement in the mid-1700s to the 1820s, the Town's economy was largely driven by agriculture. The Industrial Revolution and advent of the railroad brought change to the Town's economy and, as a result, the first large-scale manufacturing facilities were developed. Walley Mill, a cotton textile mill, was constructed on the Green River circa 1826. Later in the 1800s, Cable Mills was constructed on Water Street and operated as a twine and textile mill into the 1920s, followed by wire and metals manufacturing until the 1990s. The Williamstown Mill was constructed in 1865 at the Site.

The Site is located within Census Block Group 4 of Census Tract 9201.01 (the Target Area), which is an Environmental Justice (EJ) community due to median household income levels below 50% of the Massachusetts statewide median income (MassGIS, 2010). Demographic information for the Target Area is provided in *Table 1* below:

Table 1
Demographic Information

	Target Area (Census Block Group 4 of Tract 9201.01)	Town of Williamstown	Massachusetts	United States
Population	679 ⁴	7,605 ⁴	6,705,586 ⁴	314,107,084 ¹
Unemployment Rate	14% ⁴	5.2% ⁴	7.6% ⁴	5.0% ²
Poverty Rate	15.2% ⁴	10.8% ⁴	11.6% ⁴	15.6% ³
Percent Minority	16.8% ⁴	15.3% ⁴	20.4% ⁴	37.2% ¹
Median Household Income	\$32,357 ⁴	\$72,393 ⁴	\$68,563 ⁴	\$53,482 ³
2000 Population	1,330 ⁵	8,424 ⁵	6,349,097 ⁵	281,421,906 ⁵
Percent Population Change Since 2000	-49%	-10%	+6%	+12%

1) Data are from the 2014 American Community Survey data profile and are available on American FactFinder at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_DP05&src=pt

2) Data are from the Bureau of Labor Statistics (The Employment Situation – March 2016) and are available at <http://www.bls.gov/news.release/pdf/empsit.pdf>

3) Data are from the 2014 American Community Survey data profile and are available on American FactFinder at http://factfinder.census.gov/faces/tableservices/jsf/pages/productview.xhtml?pid=ACS_14_5YR_DP03&src=pt

4) Data are from the 2015 American Community Survey data profile and are available on American FactFinder at <http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

5) Data are from the 2000 American Community Survey data profile and are available on American FactFinder at <http://factfinder.census.gov/faces/nav/jsf/pages/searchresults.xhtml?refresh=t>

Economically disadvantaged residents of the Target Area are particularly susceptible to the health and welfare impacts resulting from the contamination, blight, and stagnation that characterize the Site. Furthermore, the increasing lack of affordable housing options in Williamstown is forcing low income residents from their homes. These circumstances worsened substantially in August 2011, when flooding caused by Hurricane Irene destroyed much of the housing stock occupied by low income residents.

As a result of these challenges facing the Target Area, the Town is pursuing redevelopment of the Site as multi-unit affordable housing. However, the building materials throughout the remaining structure contain significant quantities of asbestos and lead-based products, which pose a health risk to the community, as well as an impediment to redevelopment. The Town intends to use the Cleanup Grant to reduce liabilities and public health risks associated with building material hazards.

The conceptual redevelopment plan includes refurbishment of the existing building as a residential apartment building, as opposed to comprehensive demolition. In addition to renovation of the existing building, construction of new housing units at the Site is also planned. The development is intended to provide much needed affordable housing for the Williamstown community, and will offer past residents who were displaced by 2011 flooding associated with Hurricane Irene an opportunity to return to the

Town. Revitalization of the Site will significantly increase the inventory of affordable housing, thereby easing the trend of rising housing costs which have driven low income families from Williamstown.

4.2 Chronology of Community Involvement

To date, efforts to involve the community in the cleanup planning for the Site have consisted of the following:

- Public meetings were held at the Williamstown Town Hall on December 17, 2015 and November 30, 2016 to discuss and provide the public with information in regards to the cleanup plan and overall plan for Site redevelopment. A representative of Fuss & O'Neill discussed the cleanup project at both meetings as a Qualified Environmental Professional (QEP).
- Preliminary drafts of an *Analysis of Brownfields Cleanup Alternatives* (ABCA) for the Site were prepared by Fuss & O'Neill, on behalf of the Town, as part of the 2015 and 2016 Brownfields Cleanup Grant application processes completed by the Town. The availability of the draft ABCAs for review and comment by the public was publically-advertised via notices in the local newspaper on December 5, 2015 and November 23, 2016.
- An Information Repository of documents pertaining to the environmental condition of the Site was established at the Town's offices in December 2015.

4.3 Results of Previous Community Involvement Efforts

A key objective of the public meetings held in 2015 and 2016 was to provide the public with a summary of the proposed preferred cleanup approach, as documented in the preliminary draft ABCAs. The preliminary preferred remedial alternative – the comprehensive removal and off-site disposal of asbestos- and lead-containing building materials – was selected following the analysis of several cleanup options, which considered financial feasibility, effectiveness at protecting human health, implementability, and consistency with the long-term Site reuse plan.

Meeting attendees inquired about the extent and type of asbestos- and lead-containing materials, potential exposure scenarios, as well as disposal procedures. The abatement procedures, health and safety protocols, and disposal requirements were discussed during the meetings by the QEP.

4.4 Benefit to Targeted Community

By facilitating the redevelopment project, the cleanup will have substantial benefit to the health and welfare of the Target Area. Revitalization of the Site will significantly increase the inventory of affordable housing, thereby easing the trend of rising housing costs which have driven low-income families from Williamstown. This benefit will ensure greater housing stability and cost certainty for

existing residents of the Target Area, as well as provide residents who have migrated from the Target Area or were displaced by the Hurricane Irene flooding with an opportunity to return to their hometown and live in quality, modern housing that is free of hazardous building materials, and which they can afford without being over-burdened. In short, the project will improve the welfare of the Target Area and the Town through helping to control overall housing expenses and reverse the trend of out-migration of working-aged residents and their families.

5 Continued Community Involvement

To solicit public comments on the approach to cleanup of the Site, it is critical that an understanding of Site conditions, the existing health and environmental risks, the need for response actions, and the types of response actions to be implemented be provided to the public. Additional detail regarding how this information will be disseminated to the public is provided in the following subsections.

5.1 Information Repository

As introduced above, a publically-accessible information repository has been established at the Williamstown Town Hall. Environmentally-pertinent documents pertaining to the Site that have been prepared to date are available in the repository. Copies of the May 2014 *Phase II Comprehensive Site Assessment and Class A-3 Response Action Outcome Statement* and October 2015 *Limited Hazardous Building Materials Inspection Report* prepared for the Town are included in the repository. The repository will be updated with the inclusion of meeting minutes (see *Section 5.3*), environmental monitoring reports, and other documents pertinent to cleanup, as they are generated. The information repository will be maintained for a minimum of three years following cleanup.

Arrangements to review documents in the repository during normal business hours can be made by contacting:

Mail: Mr. Andrew Groff
Community Development Director
Town of Williamstown
31 North Street
Williamstown, MA 1267-2003
413-458-9344

Electronically: AGroff@williamstownma.gov

5.2 ABCA Notification Process

As discussed above, preliminary draft ABCAs were developed previously to evaluate abatement approaches to address hazardous building materials at the Site with respect to cost and public benefit, along with other criteria. A draft final ABCA documenting the preferred cleanup plan was submitted for USEPA review in March 2018 and will be provided for public review and comment in accordance with USEPA's cleanup grant requirements, prior to finalizing.

The availability of the draft final ABCA for public review and comment will be advertised on the Town website. The advertisement will announce the start of a 30-day comment period on the final draft ABCA. The advertisement will also provide notification that the ABCA will be discussed and comments will be accepted at an upcoming public meeting. The contact information documented in *Section 5.1* will be provided in the advertisement.

The Town will accept comments on the preferred cleanup plan documented in the ABCA during the comment period and, if warranted, will provide written responses that will become a part of the administrative record maintained in the repository. These comments will also be considered as part of selection of the final preferred cleanup approach. Upon completion of the 30-day comment period, the Town will prepare a final ABCA that will respond to comments received during the comment period, as warranted, and provide the final analysis of cleanup alternatives. The final ABCA will be completed within 60 days of the end of the comment period and will be available in the Information Repository.

5.3 On-Going Outreach Activities

Update presentations will be conducted on a minimum quarterly basis by the Town at public meetings which will be held at the Town's offices. The updates will be used to provide updates on cleanup progress. The frequency of meetings will be increased as needed, if requested by the community or to accommodate key milestones in the design, cleanup, and construction process. In addition to communicating project progress, attendees will also be encouraged to provide input and ask questions regarding the cleanup and redevelopment. A QEP will attend these meetings to ensure that technical expertise is available and appropriate protection of human health is prioritized in cleanup-related decision-making.

The Town will notify the public of the upcoming meetings by placing advertisements on the Town website at least two weeks prior to the meeting date. To ensure that members of the Target Area who may not have internet access are notified, flyers will also be placed in the mailboxes of nearby residents and posted at public places including Town Hall, Town Library, and the Senior Center. Following each meeting, meeting minutes and progress updates will be prepared and posted on the Town website. When applicable, the Town will communicate project progress status updates to Community-Based Organizations and MassDEP through the distribution of progress summaries that will be e-mailed to appropriate personnel and available in the Information Repositories. As the consultant selected by the Town to provide technical oversight of the cleanup activities, Fuss & O'Neill will work with the Town to disseminate complete and accurate information using the means described herein.

6 Proposed Project Schedule

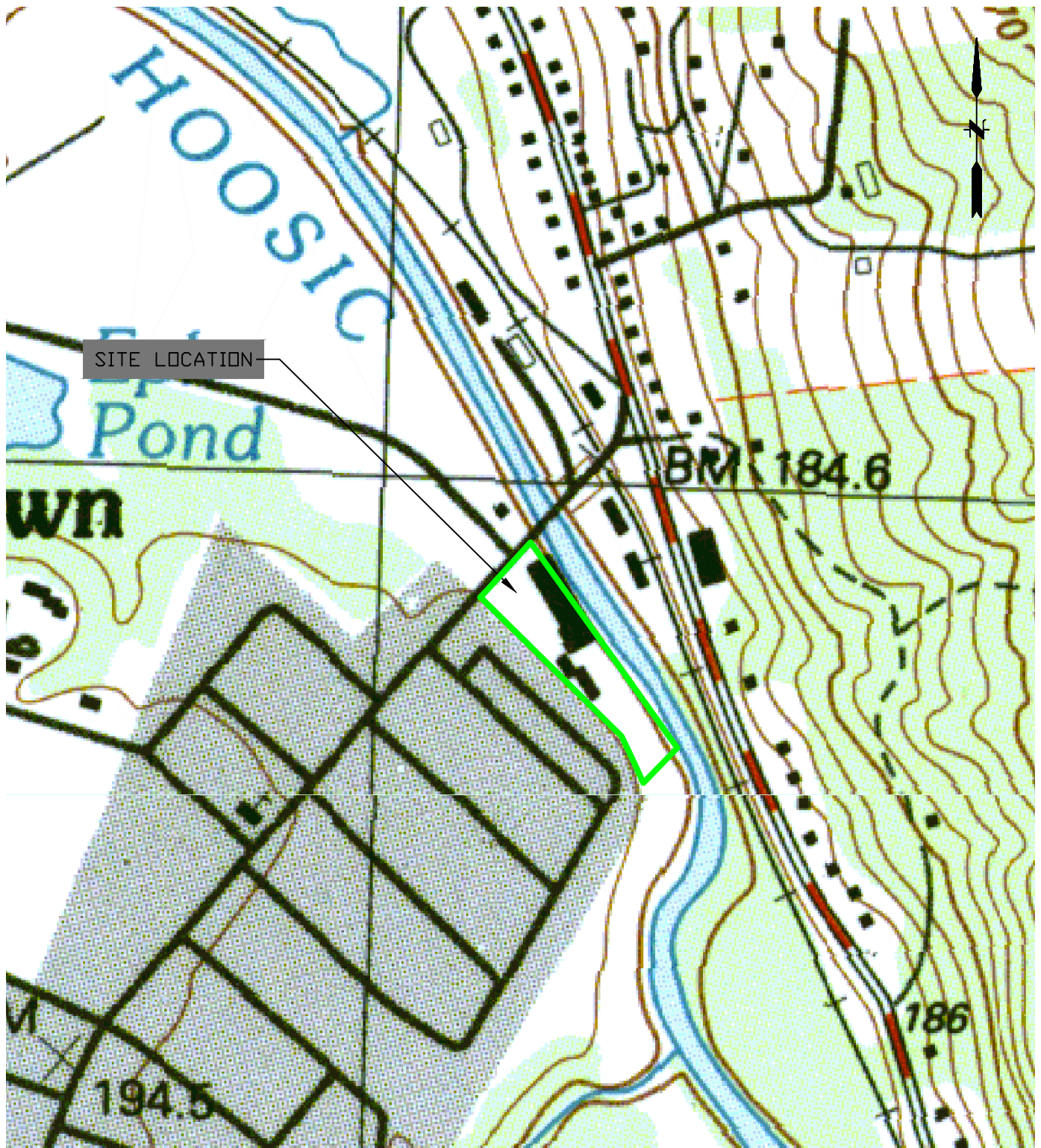
After the completion of project steps with deliverables, the informational repository will be updated. The tentative project schedule includes the following steps:

- March to April 2018 – Prepare and submit CRP to USEPA for review. Prepare and advertise the availability of a draft final ABCA for the Site, as described in *Section 5.2*, marking the beginning of a 30-day public comment period. The Town will also conduct the public

meeting to present draft final ABCA and solicit comments.

- May 2018 – 30-day public comment period on the ABCA ends. Respond to public comments on abatement strategy, as warranted, and finalize ABCA. Initiate the public outreach activities summarized in *Section 5.3*.
- Spring to Summer 2018
 - Finalize abatement planning and permitting documents.
 - Pre-bid meeting, contractor bids submitted, and bid award. Prepare *Quality Assurance Project Plan (QAPP)* for USEPA comment and approval.
- Fall 2018 to Winter 2019
 - Complete Site abatement activities.

Figures



MAP REFERENCE

THIS MAP WAS PREPARED FROM USGS TOPOGRAPHIC QUADRANGLE IMAGES

SOURCE: OFFICE OF GEOGRAPHIC AND ENVIRONMENTAL INFORMATION (MASSGIS), COMMONWEALTH OF MASSACHUSETTS
 EXECUTIVE OFFICE OF ENVIRONMENTAL AFFAIRS

SCALE:
HORZ.: 1" = 500'
VERT.:
DATUM:
HORZ.:
VERT.:
0 250' 500'
GRAPHIC SCALE



FUSS & O'NEILL

1550 MAIN STREET, SUITE 400
 SPRINGFIELD, MA 01103
 413.452.0445
 www.fando.com

TOWN OF WILLIAMSTOWN

SITE LOCATION MAP

330 COLE AVENUE

WILLIAMSTOWN

MASSACHUSETTS

PROJ. No.: 20150720.A20
 DATE: FEBRUARY 2018

Figure 1