



Brownfields Cleanup Community Relations Plan

July 15, 2020

**Former Dalton Hardwood
North Street
Dalton, Massachusetts**

Prepared For:

Town of Dalton
462 Main Street
Dalton, Massachusetts 01226

Prepared By:

TRC
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A handwritten signature in black ink that reads "Maxwell P. Scott".

Prepared by: Maxwell Scott

A handwritten signature in blue ink that reads "Thomas M. Biolsi".

Reviewed by: Thomas Biolsi, PG



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1.0 Introduction

This Community Relations Plan (CRP) has been prepared to describe the Town of Dalton's plan to address the needs and concerns of residents potentially affected by the proposed cleanup (underground storage tank [UST] removal and removal of various containers inside the garage) at the Former Dalton Hardwoods property located at North Street in Dalton, Massachusetts (the Site).

The Site is currently vacant land with one garage structure in poor condition and a visible foundation of a former house. The Town of Dalton intends to redevelop the Site into a park/recreational area (North Mountain Park) for residents and visitors and users of the Town of Dalton. This CRP outlines how the Town of Dalton will involve interested residents, Town officials, and local organizations in the decision-making process regarding cleanup at the Site.

Between 2018 and 2019, two phases of environmental investigations were conducted at the Site using United States Environmental Protection Agency (EPA) Brownfields Assessment Grant funding awarded to the Berkshire Regional Planning Commission (BRPC) in 2017. These investigations revealed a UST potentially containing No. 2 fuel oil to heat the garage and possibly the adjacent house. Additionally, various containers of less than 30 gallons were observed in the old garage on the Site. The various containers are attributed to a past usage of the garage as a maintenance and repair garage.

Additional Brownfields Assessment grant funding through BRPC and a sub-grant awarded to the Town of Dalton in June 2020 from BRPC's Brownfields Revolving Loan fund program will be used to conduct the required cleanup of the Site prior to its redevelopment.

Environmental cleanup at the Site will be conducted in accordance with the Massachusetts Department of Environmental Protection's Massachusetts Contingency Plan (MCP; 310 Code of Massachusetts Regulations 40.0000) under the direction of a Massachusetts Licensed Site Professional.

1.1 Spokesperson and Information Repository

The spokesperson for this project is Ms. Rebecca Slick, Town Planner, who may be contacted at the following address and phone number:

Town of Dalton
462 Main Street
Dalton, Massachusetts 01226
(413) 684-6111 x29

An Information Repository has been established at the office of the Town Planner at the Dalton Town Hall, (413) 684-6111. Persons wishing to review reports and/or other information relative to

environmental conditions at the Site should visit the Town Planner's Office at the Dalton Town Hall, located at 462 Main Street in Dalton, Massachusetts, on Monday between 8:00 AM-5:00 PM or Tuesday through Thursday between 8:00 AM and 3:00 PM. However, due to the ongoing restrictions from the COVID-19 pandemic, access to the Town Hall and other public buildings may be limited. Therefore, persons wishing to review reports and/or other information relative to environmental conditions at the Site may visit the Town's website at <https://dalton-ma.gov/town-planner/>.

Public meetings concerning the project Site will be held at the Dalton Town Hall or the Dalton Senior Center if permitted due to the COVID-19 pandemic or will be held via Zoom or other virtual meeting platform. The date and time of public meetings will be advertised 48 hours prior to the scheduled meeting 1) in the Office of the Town Clerk; and 2) on the Town of Dalton website under the news and events page: <https://dalton-ma.gov/>.

2.0 Site Information

This section summarizes the Site location, history, and existing environmental conditions.

2.1 Site Location

Based on information obtained during TRC's 2018 Phase I Environmental Site Assessment (ESA), the Old Dalton Hardwood Site (the Site) is approximately 9.5 acres located on North Street in Dalton, Berkshire County, Massachusetts, in a rural area with a few small commercial and residential structures in the area. The Site is described by the Town of Dalton tax assessor as Map 215, Lot 13, is zoned as R4 residential, and is currently owned by the Town of Dalton.

The Site is bordered by North Street to the south, undeveloped land to the north and west, and the current Dalton Hardwood Company to the east, just over the Town border in the Town of Windsor. The surface elevation of the Site is approximately 1,431 feet above mean sea level with local topography sloping steeply to the south/southeast. Shallow groundwater is presumed to flow to the south-southeast toward Weston Brook based upon local topography.

2.2 Site History

The Site historically was used as a staging yard and saw mill from approximately 1950, "aka old Dalton Hardwood," until the mid-1990s, when operation ceased and moved to an adjacent property to the east, just over the Town border to the Town of Windsor. The Town of Dalton acquired the Site in 2014. The Site is currently vacant land with one garage structure in poor condition and a visible foundation of a former house.

2.3 Nature of Threat to Public Health and Environment

In July 2018, MassDEP was on Site to inspect the possible release of contamination. One building and remnants of other foundations were observed. The one building still standing appears to have been used as a maintenance and repair garage. Several aboveground storage tanks (ASTs) and metal pipes were observed in the center of the Site. One of the on-Site personnel during the visit indicated the possibility of the Dalton Hardwood Company accepting tanks as scrap metal. The Town Commission previously had a few test pits excavated to determine the depth to bedrock and uncovered a car frame, crushed drums, and scrap metal. The location of the pits was approximately 400 feet north of the garage. No indication of petroleum contamination was observed during test pit excavation activities, which extended down to approximately 16 feet below ground surface. Within the garage, several containers, sized 5 to 30 gallons, were observed containing lubricating and hydraulic oils. It was recommended that a Phase I/due diligence site assessment be conducted prior to development of the Site. Based on the findings of TRC's Phase I ESA report, dated November 2018, two recognized environmental conditions (RECs) were identified as summarized below.

REC No. 1

Information was provided regarding oil sprayed on the dirt road for dust suppression during former Site operations. Although no oil was observed along the access road on the Site, the potential exists for oil contamination to be present along the dirt road that runs through the Site and/or under the existing pavement under the access road in the southern portion of the Site. This would constitute a REC by the potential presence of hazardous materials in the environment. Depending upon the duration, amount, and frequency of oil application, the REC may be associated with potential soil and/or groundwater contamination.

Following the completion of the Phase I ESA, based on information received from contacts with knowledge of historic Site usage, a water truck was used for dust suppression and there was no knowledge of oil being used as a dust suppressant anywhere on the Site. Therefore, TRC concludes a miscommunication likely occurred during the Site visit in October 2018, and as a result, REC #1 was no longer considered a REC. However, as a conservative measure, soil sampling was completed along the dirt road through the Site (as described below) during Phase II investigations.

REC No. 2

TRC observed a vent pipe along the southeast corner of the garage on the Site. TRC believes a UST may be present near this location, possibly located in front of the garage near the southeast corner of the building due to the lack of large trees in this area. No additional information was available that indicated the contents, size, or age of this suspected UST, but TRC assumes that the UST contained No. 2 fuel oil to heat the garage and possibly the former adjacent house and

that the UST is less than 1,000 gallons. The potential exists for the assumed contents of petroleum in the UST to have impacted the subsurface conditions at the Site, which would constitute a REC.

Based on the findings of the Phase I ESA, TRC conducted Phase II ESA activities at the Site in May 2019 consisting of the following:

- The collection of four surface soil samples from 0 to 3 feet below grade along the dirt road through the Site for laboratory analysis of petroleum-related compounds and lead. No petroleum-related compounds or lead were identified in the soil above the State's reporting criteria supporting the historical accounts of only water being sprayed on the dirt roads for dust suppression.
- Excavating a test pit near the location of a suspected UST near the southeast corner of the garage and finding a 1,000-gallon UST. The UST appeared to be roughly half-full of petroleum/water mixture and insufficient funds were available at the time to pump, clean, and remove this UST because of the additional liquid present in the UST and the discovery of a previously unknown 275-gallon AST found discarded in the woods, approximately 50 feet southeast of the garage as described below.
- Finding a newly discovered 275-gallon AST located approximately 50 feet southeast of the garage in the woods containing approximately 6 inches of liquid. This AST was pumped out, cleaned, and removed off the Site. No petroleum staining was observed under the AST.

Based on the findings of the Phase II ESA conducted in May 2019, the following additional response actions are warranted.

- Pump, clean, and remove a 1,000-gallon UST located near the southeast corner of the former garage building and collect confirmatory post-excavation soil samples after the UST is removed.
- Remove and dispose the four containers of various petroleum-based liquids present inside the garage.

The Town of Dalton received an EPA ID number in July 2019 to allow the bulk transport and disposal of petroleum liquids from the UST. TRC will conduct oversight of the above activities using EPA Brownfields Petroleum Assessment grant funding under BRPC. Sub-grant funding awarded to the Town of Dalton in June 2020 from BRPC's Brownfields Revolving Loan Fund program will be used by the Town to procure the services of an environmental contractor to remove and dispose of the UST and petroleum containers.

3.0 Community Involvement Plan

This section summarizes the community background, previous community involvement activities, and the plan for continued community involvement for the Site.

3.1 Community Profile

The Town of Dalton, incorporated 1784, has a total area of 21.9 square miles. According to the 2010 U.S. Census Bureau, the Town is home to 6,756 year-round residents, 44.5 percent are male and 55.5 percent are female.

Census data further indicates that 95.5 percent are white, 0.2 percent are black or African-American, 4 percent are Hispanic, 1.9 percent are Asian, 0.6 percent are American Indian or Alaska Native, and 1.5 percent are from two or more races. The median household income for Dalton is \$59,875.

3.2 Chronology of Community Involvement

The Town of Dalton is the primary stakeholder in the CRP for the cleanup and reuse planning for this Site. The Town of Dalton has kept the target community informed of the progress of the project through regularly scheduled Select Board meetings, which are open to the public and are televised on the Town's local cable access channel, Dalton Community Television (DCTV).

Community connections have been instrumental in making sure the community and neighborhood are aware of the Town of Dalton's activities regarding this project. The Town has worked with BRPC since the Town of Dalton acquired the property in 2014 and discovered that the Site may be eligible for assessment and remediation under EPA's Brownfields program. The Town received EPA assessment grant funds through BRPC in 2018 and 2019 and recently received a sub-grant through BRPC's Revolving Loan Fund program in June 2020 to perform the removal of the UST and various small containers of petroleum inside the garage.

3.3 Key Concerns

Key concerns with the Site cleanup include the safe disposal of all vessels containing potentially contaminated fluids to eliminate exposure by any and all future visitors to the Site. Exposure to contaminants could potentially be experienced via ingestion, inhalation, or dermal exposure. Prior to initiation of cleanup activities, TRC will prepare an Analysis of Brownfields Cleanup Alternatives (ABCA) document that will identify the most appropriate means to cleanup the Site, although the proposed cleanup of this Site is straightforward. The appropriateness of the cleanup alternatives will be evaluated based on the anticipated success of the project to mitigate potential risks from exposure to Site contaminants by construction workers, nearby residents, trespassers, and future Site users. The ABCA will be available for public review 30 days prior to commencement of Site cleanup work.

Following Site cleanup activities, soil samples will be collected to evaluate the success of the project at meeting its remediation objectives. Analytical data from samples collected after remediation will be compared to established environmental criteria to assess potential risks to exposure by future Site users.

3.4 Continued Community Involvement

The Town and BRPC will use its best efforts to engage members of community in the development of the cleanup plan, to provide regular updates on the cleanup activities, and to seek public involvement in the re-development of the Site. The Outreach program throughout the cleanup process will use multi-media including public meetings, website information updates, informational literature, newspaper articles, social media, and/or communicated through the local cable access channel, DCTV. Due to the ongoing COVID-19 pandemic, the Town will record public meetings (if held in person) and make available through the Town's local cable access channel, DCTV, and/or via Zoom meeting. Information will be presented in concise, non-technical language that is understandable by a broad audience. Translators will be present at meetings, if necessary. Press releases and public notices will be developed to inform the community about dates, locations, and agendas of upcoming meetings and will provide project updates. Public informational meetings will be scheduled before and at the completion of the cleanup project within the neighborhood and will be presented by the Town of Dalton with help from the environmental consultant to discuss the objectives, progress, and success of the proposed cleanup and redevelopment of the Site. Throughout the cleanup process, the public may contact the spokesperson for this project for more information or to ask questions.

In conformance with the Brownfields Cleanup Grant requirements, the public notices will also announce that the Town Planner's office has been established as the information repository for this project and that it contains copies of the environmental assessments, risk assessments, and other environmental information related to the Site. The information repository will be updated with the inclusion of meeting materials, status reports, public comments, and other communications related to the Site.

Per EPA's reporting requirements, once a draft ABCA has been completed, a legal notice will be printed in the Berkshire Eagle announcing a 30-day public comment period on the report. During the comment period, the Town of Dalton will provide written responses to comments received, and these written responses will become part of the administrative record. The Town of Dalton will hold a community meeting, tentatively scheduled to be held in conjunction with a Board of Selectmen meeting, during the 30-day comment period, to inform residents of the proposed cleanup plan and answer questions regarding the project. The community is encouraged to ask questions during this public meeting and/or submit any comments or questions during the 30-day comment period on the proposed cleanup of the Site.