



City of Fitchburg, Massachusetts
DEPARTMENT OF COMMUNITY DEVELOPMENT

HOUSING & DEVELOPMENT ♦ PLANNING ♦ ECONOMIC DEVELOPMENT

ELIZABETH MURPHY
Executive Director

NARRATIVE INFORMATION SHEET

EPA BROWNFIELD CLEANUP GRANT APPLICATION – EPA-I-OLEM-OBLR-25-07

1. Applicant Identification

City of Fitchburg
718 Main Street
Fitchburg, MA 01420

2. Website URL

www.fitchburgma.gov

3. Funding Requested

- a. Grant Type: Multiple Site Cleanup
- b. NFederal Funds Request: \$1,544,000

4. Location

City of Fitchburg, Worcester County, Massachusetts

5. Property Information

- Former Bemis Road Garage, 173 Bemis Road, Fitchburg, MA 01420-6437
- Former Cumberland Farms, 580 John Fitch Highway, Fitchburg, MA 01420-8401

6. Contact Information

Project Director, Amy LeBlanc, Senior Project Manager
718 Main Street, Fitchburg, MA 01420
978-829-1893
aleblanc@fitchburgma.gov

Chief Executive, Samantha M. Squailia, Mayor
718 Main Street, Fitchburg, MA 01420
978-829-1801
mayor@fitchburgma.gov

7. Population

City of Fitchburg - 41,946 Census 2020

8. Other Factors Checklist

Other Factors	Page #
Community population is 15,000 or less.	n/a
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	n/a
The proposed 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.	n/a
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).	2
The proposed site(s) is in a federally designated flood plain.	n/a
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	n/a
The reuse of the proposed site(s) will incorporate energy efficiency measures.	n/a
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	n/a
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	n/a

9. Releasing Copies of Applications: N/A – application does not have confidential, privileged or sensitive information.

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

Fitchburg is a 28.1 square mile city located in north central Massachusetts, with approximately 42,000 citizens. The city was originally incorporated as a town in 1764 and as a City in 1872. This long-established community had a manufacturing-based economy dating back to the 19th century, with a historic emphasis on mill industries situated along the Nashua River. Fitchburg's mill history started in 1750 with a gristmill and sawmill and the third cotton mill in the United States. During the 19th century, industrial expansion grew to include manufacturing of machines, saw, chains, textiles, paper, guns, axle grease, bicycles and shoes. During this time, numerous mills, particularly paper mills, discharged their waste directly into the Nashua River and on adjacent land. The closing of mills and other businesses as our economy declined has resulted in the presence of many vacant sites throughout the city that are polluted by their past uses. According to the state of Massachusetts Waste Site and Reportable Release database, Fitchburg has 415 reported releases of contamination since 1985. This is certainly an undercount considering owners of potentially contaminated sites may not be inclined to assess for contamination if they will be held responsible for costs of clean up.

The City of Fitchburg has a poverty rate of 15.5% (Census Quick Facts 19-23) as opposed to 9.7% for Massachusetts as a whole and a Median Household Income(MHI) of just \$54,683 which is 65% of the MA MHI (BLS via FRED). Nationally, Fitchburg is a Community Development Block Grant (CDBG) Entitlement Community and also serves as the lead city in the Fitchburg-Leominster HOME Program. According to the ACS five-year estimates, 53.83% of the city is defined as low or moderate income. Compounding the issue for our residents is the high cost of living. The World Population Review shows Massachusetts has the 3rd highest cost of living, behind only Hawaii and California.

The proposed target properties, 173 Bemis Road and 580 John Fitch Highway are both located in Block 1 of Census Tract 7101 which is the Target Area for this application and has a MHI just 77% of the Massachusetts state average (BLS via FRED). The U.S. CDC ASTDR shows that tract 7101 is in the 86th national percentile for proximity to Toxic Release Inventory sites. John Fitch Highway is a business hub and a heavily travelled commercial corridor connecting Route 2A, a major state road, to other city areas, with the subject site at a congested intersection. 173 Bemis Road is located in a neighborhood business district and has a mixture of residential, industrial, and commercial uses. Traffic is heavy on Bemis road as commuters head to other local commercial districts and Rte. 2 (a major east-west state highway). Both proposed sites negatively impact our Target Area by posing direct health risks from hazardous contaminants and adding to blight which leads to lower property values, deters investment, and increases public safety concerns.

b. Description of Proposed Brownfield Site(s)

173 Bemis Road, is located in Fitchburg, Massachusetts, on the northeast corner of Intervale Road and Bemis Road. The Site (0.25-acres) is identified by the City of Fitchburg Tax Assessor as Parcel Identification Number (PIN) 123-38-0. The property is improved with an approximately 2,500-square foot single-story, masonry block building with a partial basement which historically operated as an auto repair garage since its construction circa 1945. The building is situated in the center of the Site and is surrounded by paved parking areas. The building and associated property are currently unutilized. Since its initial use as Bemis Road Service Center Inc. (a gasoline filling station and automobile service center) the property continued to be occupied by other auto services businesses through 2010, when the building was abandoned. There are two identified release conditions at this site as documented by the Massachusetts Department of Environmental Protection and outlined in the draft Phase II ESA from December 2025. The first is Oil and Hazardous Materials (OHM) associated with historic fill material,

including heavy metals and PAHs. The second condition is associated with a waste oil release which occurred in 2010 before the city took ownership of the building. OHM associated with the waste oil release include EPH fractions and heavy metals in soil. Fill materials and historic operation of the site for automotive purposes may have also contributed to heavy metals identified in soil beneath the building slab. While 173 Bemis is located in a Commercial Business district, it is adjacent to an Industrial Zone on Intervale Road which plays a role in planned redevelopment of this site.

580 John Fitch Highway (Assessor's map ID: 35-18-0), is a 0.29-acre triangularly shaped parcel located at the intersection with Lunenburg Street in Fitchburg, in a commercial/industrial zone. While the site is not in a designated flood zone, it is directly adjacent to the AE flood zone and regulatory floodway of Falulah Brook and is also in the 200-foot buffer. Work planned for the site will be done under an Order of Conditions from the city's Conservation Commission. The Site is improved with an approximately 1,902-square foot single-story building which historically operated as a Cumberland Farms (gas station chain). The Site was most recently occupied by a Dunkin' Donuts (fast food restaurant chain) before being vacated in 2021. The city acquired the Site in February 2024. The building is situated in the center of the property and is surrounded by paved parking areas. Demolition of the building is planned for spring of 2026. Testing under a Phase II ESA completed in the Spring of 2025 detected SVOC compounds, including biphenyl, acenaphthene, benzo(a)anthracene, benzo(a)pyrene, benzo(b)fluoranthene, dibenz(a,h)anthracene, 2-methylnaphthalene, naphthalene and phenanthrene in exceedance of applicable reportable concentrations within soil samples collected from the subject property. Lead was additionally detected in exceedance of applicable reportable concentrations.

c. Reuse Strategy and Alignment with Revitalization Plans

The reuse planned at both sites includes incorporating a portion of each subject property into the public right-of-way for adjacent intersection improvements in support of economic development and safety initiatives. Fitchburg's Economic Development Strategic Plan (adopted in 2018) identified supporting a mix of businesses as a primary goal. Included in this are thoughtful redevelopment of underutilized sites, such as those along Intervale Rd., and supporting the city's manufacturing businesses. 173 Bemis Road is situated at the corner of Intervale Road which is a gateway to an established industrial area of the city that recently experienced construction of a 98,000 sq. ft. e-commerce warehouse to serve as a 'last mile' facility for Amazon. There are also 2 adjacent industrial parcels (4.3 acres and 2.3 acres respectively) that are well-positioned to accommodate new commercial/industrial development once the acute angle geometry of the Bemis/Intervale intersection is addressed. Fitchburg proactively seeks industrially zoned parcels that are currently in marginal use or nonuse to become a source for both job creation and expanded local commercial tax base. That said, the successful remediation and repurposing of 173 Bemis Road for infrastructure upgrades will lead to further economic development in the immediate vicinity by correcting the current roadway layout that is incompatible with the size and scope of traffic expected from these industrial and commercial uses. Similarly, the successful remediation and reuse of the 580 John Fitch Highway parcel will enable a heavily used commercial intersection to more effectively accommodate right turn movements, particularly at peak periods. This will improve roadway flow and safety for existing businesses in that vicinity as well as consumers, employees, residents and others that regularly must pass through this arterial intersection. Currently, an established manufacturer diagonally adjacent to the 580 John Fitch Highway parcel is contemplating expansion of their facility, which is an indicator that new jobs and expanded commercial tax base for Fitchburg awaits once the intersection improvements are addressed.

d. Outcomes and Benefits of Reuse Strategy

The cleanup of 580 John Fitch Highway will allow the city to incorporate a portion of the area into a reconfiguration of the adjacent intersection, correcting long standing issues at this site and improving safety and efficiency for both pedestrians and vehicles. Additionally, parking for nearby businesses will be improved, potentially providing an economic boon to these established ventures while also improving safety for pedestrians and vehicles by reducing vehicles backing out into traffic and allowing space for improved sidewalks. These improvements are in line with the City's goal of utilizing complete streets concepts along the John Fitch Highway Corridor.

Worth noting is that a prior fast-food business that had been situated at 580 John Fitch Highway has relocated to a more suitable location elsewhere along the corridor. This removed a primary source of many attempted illegal movements by vehicles after completing drive-through transactions at the former fast-food business. Overall, the city has conducted planning and design efforts that will improve the John Fitch Highway corridor for safer use by pedestrians and cyclists. The reuse of 580 John Fitch Highway for intersection improvements was identified by the Commonwealth of MA as a key step prior to the broader John Fitch Highway improvement plans to receive state support toward their implementation.

As mentioned in the above section, reuse of the 173 Bemis Rd. parcel toward intersection improvements will further the economic development goal of supporting a mix of businesses and thoughtful redevelopment of underutilized sites, most specifically those adjacent to this site along Intervale Road.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

The site characterization the city has already completed at 173 Bemis Road is sufficient for cleanup to be undertaken. This work was completed under a Mass Development grant the city secured for the site with additional work completed under the city's FY 2022 EPA Brownfields Assessment Grant. Additional assessment is planned at 580 John Fitch Highway using the FY 2022 EPA Brownfields Assessment Grant. A QAPP Modification to conduct supplemental soil sampling to refine the nature and extent of the soil release conditions and support remedial design is underway. The work will be completed by June 2026. We do not intend to incorporate further assessment as part of the scope for this Cleanup Grant application and do not require any additional resources for this work.

f. Resources Needed for Remediation

The requested EPA Brownfield funding will be sufficient to complete the remediation of the sites.

g. Resources Needed for Site Reuse

The planned reuse of the 173 Bemis Road Site includes reconfiguration of the intersection with Intervale Road to support the opening of a 98,000 sq foot Amazon Logistics Facility at 135 Intervale Road. This reconstruction can not occur until remediation of the site is undertaken. The entire length of Intervale Road requires upgrades to support the exponential increase in traffic that will occur upon the opening of the site. The city recently accepted a gift of \$314,000 from Amazon for the design of these needed improvements. Amazon has committed to support the construction of these improvements once the design is complete.

The planned reuse of 580 John Fitch Highway is to incorporate a portion of the area into a reconfiguration of the adjacent intersection to correct long standing issues. The remainder of the site will be utilized for parking for area businesses to help alleviate the danger of cars backing out into traffic so close to the intersection. The City has secured Community Development Block Grant funding for demolition of the

building which will occur this spring. Remediation of the environmental contaminants is then needed before the site reuse can begin. We will work with MassDOT to fund construction of the intersection improvements.

h. Use of Existing Infrastructure

The target sites are fully served by sewer, storm, drinking water, electrical, telecommunications, natural gas. The city seeks to upgrade the transportation infrastructure at and around the sites as the key component of our reuse plan to better support safety and commercial and industrial development in the target area.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. The Community's Need for Funding The City of Fitchburg is a medium-sized city with a population of 41,946 where 53.83% of residents are defined as low or moderate income according to ACS five-year estimates. At one time, Fitchburg was a thriving industrial/manufacturing city, but with much of the former manufacturing gone, the city has been left with many vacant sites that developers see as risky, considering past uses. Property values have historically been lower in Fitchburg than in much of Massachusetts. The community has a poverty rate of 15.5%, greater than the 10% and 12.4% experienced statewide and nationwide, respectively. Additionally, 13.3% of non-elderly residents are disabled, and only 66.2% of the population over 16 are in the workforce, with most leaving the city to work (2019 ACS). The unemployment rate in Fitchburg is 7%, much higher than the state and nation (5%), also contributing to a lower local tax base (2023 CS 5-Year Estimates).. Although the City is committed to remediating these sites, lower property values, a limited and declining workforce, and higher poverty rates have often meant that the City's budget is stretched thin to accommodate the many acute needs in the community, and little to no city funding is available for proactive brownfields assessment and remediation. Receiving Brownfields Cleanup Grant funding would be instrumental in revitalizing these historically industrialized neighborhoods.

2.b Health or Welfare of Sensitive Populations

As noted above, Fitchburg has significant populations of residents living in poverty (15.5%, and MHI 65% lower than MA), with over a quarter of households receiving food stamps/SNAP compared to just 14% statewide. Additional sensitive populations according to 2023 ACS estimates include children under age 5 (6% vs. 5% MA), persons with disabilities (16.4% vs. 12% MA), and women of childbearing age (25% vs. 23% MA). Specifically in tract 7101, 19% of the population is in a sensitive age category of 65 and older compared to 17% statewide, 10% have low education attainment (8.5% statewide), and 15% are disabled. These populations are already vulnerable and may be disproportionately impacted by the negative environmental impacts of local brownfields. Removing blighted conditions and environmental hazards and redeveloping the roadway and sidewalks for safer transportation options while supporting investment in these target neighborhoods will have a positive effect on these sensitive populations and reduce the threats that site contamination poses to them.

2.c Greater Than Normal Incidence of Disease and Adverse Health Conditions

Data from the MA Environmental Public Health Tracking (EPHT) shows that Fitchburg has a higher incidence of heart attacks, low birth rates, childhood asthma and childhood lead poisoning (20.1 vs. 12 per 1,000) than the state averages. Cancer rates for Fitchburg tracked by the Commonwealth for the 2016-2020 period show above expected rates for fifteen types of cancer. According to the U.S. CDC, the adult asthma rate experienced in tract 7101 of 12.2% is also higher than that of the nation at 10.8%. U.S. CDC data also indicates that Worcester County experiences greater prevalence of birth defects (per 10,000 births) associated with environmental exposures compared to the state, such as cleft lip (2.62 vs.

2.5), gastroschisis (2.46 vs. 2.12), and hypospadias (68.28 vs. 66.27). Clean-up of the sites with proper worker and public safety protocols will reduce the risk of exposure to environmental contaminants and help alleviate the risk to the area’s vulnerable populations and help set the stage for a healthier future population.

2.d Economically impoverished/Disproportionately Impacted Populations

The U.S. CDC ASTDR shows that tract 7101 is in the 86th national percentile for proximity to Toxic Release Inventory sites, 93rd percentile for lead paint (housing built pre-1980), 80th percentile for proximity to railroads, and 97th percentile for proximity to airports. The documented high incidence of poverty and vulnerability of our local population are limiting factors in their opportunity to choose to live in a location less impacted by these hazards.

Remediation and removal of these contaminated and blighted properties will improve the overall value of the neighborhoods and the properties within, increasing the potential for property owners to tap into increased equity to make repairs and investments in their properties. Residents will enjoy a neighborhood with improved aesthetics, reduced hazards, and an increased sense of safety.

2.e Project Involvement

2.f. Project Roles

Name of organization/entity/group	Entity's Mission	Point of contact (name & email)	Specific involvement in the project or assistance provided
Montachusett Regional Planning Commission	Carry out comprehensive planning in the Montachusett Region	Glenn Eaton, geaton@mrpc.org	Assistance with reuse planning, outreach

2.g. Incorporating Community Input

Several methods will be used to communicate progress to the local community residents and businesses to ensure they are aware of and educated about the project with opportunities to provide feedback. The City will utilize existing methods for community engagement, such as the regularly-conducted public meetings as a component of its CDBG planning process. These meetings are held in-person with a virtual attendance option. Residents may also provide feedback in person, by phone, mail, online comment portal, or e-mail to accommodate all residents and their preferred methods of communication. The City will also employ electronic communication to disseminate information about the program. Language services will be provided by bilingual City staff, partner agencies, or the translation service contracted by the City, as appropriate. Comments will be responded to in the manner in which they were received, or through the preferred method of the commenter.

3. TASK DESCRIPTIONS,COST ESTIMATES AND MEASURING PROGRESS.

3.a Proposed Cleanup Plan

The preferred cleanup alternative for both properties includes excavation and off-site disposal of contaminated soil. Soil within an area of the former Cumberland Farms was found to contain semi-volatile organic compounds (SVOC) and lead at levels exceeding risk-based state standards. These conditions were attributed to past automotive service operations. At the former Bemis Garage, a waste oil spill inside the building migrated through floor drains and other openings in the slab, resulting in petroleum compounds and heavy metals in sub-slab soil at concentrations above risk-based standards. An area outside the Bemis Garage was also confirmed to contain anthropogenic fill materials,

which contributed metals in soil at levels exceeding state standards. Prior to removal of the waste oil-contaminated soil at Bemis Garage, the overlying building must be demolished, including abatement of asbestos-containing materials and lead based-painted surfaces. The hazardous building materials will be abated via removal and off-site disposal, including perimeter air monitoring for release of asbestos fibers. Soil samples will be collected from the limits of the soil excavations to confirm that the removal actions have achieved compliance with risk-based standards. A licensed Asbestos Project Monitor will perform clearance of abated areas of the building. Waste characterization samples will be collected from the soil and building materials waste streams to determine whether some or all of the materials must be disposed as RCRA-regulated hazardous waste. The excavated soil and hazardous building materials will be disposed at appropriately-licensed landfills and/or recycling facilities.

3.b.c.d Project Implementation, Schedule, Lead, Outputs

Task 1: Cooperative Agreement Execution and Oversight and Selection of a Qualified Environmental Professional (QEP)

- a. Cooperative Agreement: The City of Fitchburg will execute a Cooperative Agreement with the EPA upon initiation of this grant. Output will be an Executed Cooperative Agreement.
- b. Solicitation and Selection of a QEP: The City will follow federal procurement and contracting protocol to procure an QEP for the project. Output will be an executed contract with a QEP. (QTR
- c. Cooperative Agreement oversight, reporting and drawdowns will be undertaken (City) throughout the course of the grant period.

Task 2: Pre-Construction Activities

The City will work with the QEP and EPA to undertake preconstruction activities for both sites including:

- Confirming the assumptions of the Clean-up Plan (QEP, EPA) (QTR 1)
- Outreach to the public about the planned scope of work (City, QEP) (QTR 1)
- Coordinating with EPA and MassDEP (City, QEP) (As Needed, On-going)
- Developing a clear scope of work to be incorporated into the Clean-up Bid and Contract documents (QEP, City) (QTR 2/3)
- Developing and obtaining approval for the Quality Assurance Project Plan (QAPP) (QEP, EPA) (QTR 3)
- Undertaking procurement of the clean-up contractor following all required procurement guidelines and executing a contract with a qualified firm. (City) (QTR4)

Task 3: Site Clean-up

The City will work with the QEP, EPA and the Site Contractor to complete the Remediation of 173 Bemis Road and 580 John Fitch Highway including:

- The City and QEP will provide Construction Administration and Oversight throughout the project for both project sites. (City/QEP) (QTR 4 – QTR 10)
- Notification of project stakeholders and businesses and residents in close proximity to the project sites before work begins (City) (QTR 4)
- Permitting and pre-work submittals including a health and safety plan (contractor, City) (QTR 4)
- Mobilize, secure the sites, set up erosion control measures (Contractor) (QTR4)
- Building abatement and materials disposal -173 Bemis (Contractor) (QTR 5)
- Demolition of asphalt, concrete, structures (Contractor) (QTR 6)
- Building Demolition -173 Bemis only (Contractor) (QTR 6/7)
- Excavation and Disposal of Contaminated Soils (Contractor) (QTR 7/8)
- Waste Characterization Sampling, PCM, PLM, TEM sampling and confirmatory sampling (QEP)
- Groundwater recovery, disposal and characterization (QEP, Contractor) (QTR 7/8)

- Remedial excavation and backfill (Contractor) (QTR 9)
- Demobilize (Contractor) (QTR 10)
- Remedial Action and Abatement Closure Report (QEM) (QTR 11)

Task 4: Attend EPA Brownfields Conference

Up to two City Staff will attend an EPA Brownfields Conference if recommended by EPA Staff.

3.f. | Cost Estimates

Budget Categories		Task 1 Coop Agree ment Oversite	Task 2 Pre- Construction	Task 3 Site Clean-up	Task 4 Brownfields Conference	Administrative Costs	Totals
Direct Costs	Personnel	5,000	5,000	9,000	1,000		20,000
	Fringe Benefits						
	Travel				8,000		8,000
	Equipment						
	Supplies		500	500			1,000
	Contractual	5,000	30,000	280,000			315,000
	Construction			1,200,000			1,200,000
	Other (include subawards and specific participant support costs such as stipends) (specify type)						
	Total	10,000	35,500	1,489,500	9,000		1,544,000
Total Direct Costs		10,000	35,500	1,489,500	9,000		1,544,000
Indirect Costs							
Total Budget		10,000	35,500	1,489,500	9,000		1,544,000

*The proposed budget was developed from cost estimates prepared by Fuss & O’Neill outlining their opinion of probable cost for contractual and construction work as well as an estimate by the City of the hours that City Staff will spend on oversight for the course of the project. Fringe expenses will be covered by the City. The small amount committed to supplies will be utilized for public outreach activities.

3.g. Plan to Measure and Evaluate Environmental Progress and Results

The City will require that its QEP has on staff at least one Licensed Site Professional (LSP) and one Asbestos Project Designer dedicated to this project. LSPs and Asbestos Project Designers are private practitioners licensed by the Commonwealth of Massachusetts to oversee and certify remediation or abatement projects. The City will communicate at least weekly with its QEP to ensure that adequate progress is being made. Through these communications, we will measure progress relative to cleanup work plans developed by the QEP prior to initiation of cleanup activities. The cleanup work plans will

be comprehensive and include anticipated timelines for development of regulatory submittals, contractor mobilization, cleanup and demolition activities, site restoration, and project closeout. Our Project Manager will also visit the sites during active cleanup on a minimum weekly basis to ensure that actual progress is consistent with communications with our QEP and remediation milestones are being met. We will hold check-in meetings with our QEP and remediation contractor at the beginning of each week during active remediation to establish expectations for specific work planned for that week and will measure progress relative to the weekly projections. Expected outputs that will be tracked during weekly meetings with our QEP include cleanup plans, status reports, analytical data, and closure reports. We will review confirmatory soil data, air monitoring data, and waste characterization data with the QEP to evaluate progress towards achieving outcomes. Our approach of requiring cleanup work plans, regular update meetings, weekly construction projections, and performing site visits will help ensure that the key outcomes of preparing the Sites for the infrastructure improvements will be met in a timely fashion.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Organizational Structure Fitchburg's Community Development Department (CDD) staff has considerable experience in grant management and brownfield remediation. Over the last five years, the CDD has successfully managed over \$10 million in state and federal grant funding. Our Housing and Development Division is the annual recipient of over \$1.3 million in CDBG and HOME funding, and ensures that these funds are spent in a timely and efficient manner. Its Economic Development Division works to encourage development that will stimulate the tax base, improve economic competitiveness, and increase job opportunities. Its Planning Division develops long-term planning for the City, and serves as liaison to both the City's Planning Board and Conservation Committee.

4.b. Description of Key Staff : The Community Development Dept will be primarily responsible for the administration and monitoring of this grant. Amy LeBlanc, Senior Project Manager, will oversee the process by initiating the necessary procurement, working with selected consultants and contractors and ensuring compliance with the cooperative agreement. Amy has two decades of experience in the Department, and has expertly-managed a wide-range of projects, from streetscapes and parks, to rail trails, demolition, and brownfields. She is currently responsible for the management a Brownfields Community Assessment Grant. She well-versed on state and federal brownfields law, procurement law, and possesses a wide range of grant and project-management expertise. Elizabeth Murphy, the Executive Director of the Community Development Department will oversee the project, be available as back up staffing if needed, and direct public outreach.

4.c. Acquiring Additional Resources In the event that the City of Fitchburg requires the services of a contractor or subrecipient, the City would comply with all applicable procurement laws and guidelines. The Community Development Office works closely with the City's Procurement Department to ensure the use of best practices and compliance. All procurement notices are advertised in the COF website, State Publications, CommBuys (the state procurement hub), and the local newspaper. Notices are also sent to the local Chamber of Commerce, bid notification subscribers, and posted on the City's Facebook and LinkedIn pages. Competitively procured on-call engineering contracts are also available for general use by all City departments. Additionally, the City, as a CDBG Entitlement Community has extensive experience complying with Uniform Administrative Requirements under 2 CFR 200 and has experience with EPA's competitive procurement requirements and best practices.

4.d. Currently Has or Previously Received an EPA Brownfields Grant

4.d.1 Accomplishments – The City currently has an FY 2022 EPA Assessment grant which will be completed this calendar year. To-date accomplishments under this grant include Phase I Site Evaluations of seven properties, a Phase II Site Evaluation has been completed on one property and two more are well underway. Remedial Design Investigation and Redevelopment investigation are moving forward on key city brownfields. The City has partnered with the Fitchburg Redevelopment Authority to assess two sites integral to their Urban Renewal Plan in support of their goal of revitalizing the City’s downtown. Through the grant the City also assessed key parcels in our Cleghorn Neighborhood of interest to the non-profit organization Making Opportunity Count as potential sites for affordable housing development. Additionally, through this grant we have been able to more fully understand the remediation needs at 173 Bemis Road and 580 John Fitch highway which has allowed us to move forward with redevelopment plans.

4.d.2. Compliance with Grant Requirements The City is well on its way to a successful completion of our current FY2022 Brownfields Assessment Grant work plan. The City is adhering to the terms and conditions of the grant agreement and reporting on progress in the ACRES system in a timely manner. All grant funds are currently committed to specific approved sites. It is anticipated funds will be fully expended and the grant closed out within the grant period of performance.

ATTACHMENT A THRESHOLD CRITERIA RESPONSE

FY2026 US EPA BROWNFIELD CLEANUP GRANT APPLICATION

Former Bemis Road Garage, 173 Bemis Road.

Former Cumberland Farms, 580 John Fitch Highway,
Fitchburg, Massachusetts

1. Applicant Eligibility

- a. The City of Fitchburg, Massachusetts is a general-purpose unit of local government and is therefore eligible for funding.
- b. The City's tax-exempt status does not fall under section 501(c)(4) of the IRC.

2. Previously Awarded Cleanup Grants

The proposed project sites have not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Multipurpose Grant Status

The City of Fitchburg does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

Both sites are currently owned solely by the City of Fitchburg.

5. Basic Site Information

Former Bemis Road Garage Site, Bemis Road at Intervale Road, 173 Bemis Road, Fitchburg, MA 01420

Former Cumberland Farms Site, John Fitch Highway at Lunenburg Street, 580 John Fitch Highway, Fitchburg, MA 01420

6. Status and History of Contamination at the Sites

The Former Bemis Road Garage, is located on the northeast corner of Intervale Road and Bemis Road. The Subject Property is a flat, quarter-acre lot improved with an approximately 2,500-square foot single-story building with a partial basement, which historically operated as an auto repair garage since its construction circa 1945. Since its initial use as Bemis Road Service Center Inc. (a gasoline filling station and automobile service center), the Property continued to be occupied by other auto services businesses through 2010, when the building was abandoned. The parcel was taken by tax title by the city in 2022. As detailed below, this Site is contaminated by both hazardous materials and petroleum, though petroleum is considered the predominant contaminant type.

Our site assessments have identified two release conditions at 173 Bemis Road. The first is heavy metals in soil associated with historic application of fill containing anthropogenic materials including coal ash. The second condition is associated with a waste oil release which

occurred in 2010 before the City took ownership of the building. The waste oil release was caused by a ruptured pipe connecting two above-ground storage tanks in the basement. Contaminants associated with the waste oil release include extractable petroleum hydrocarbons and heavy metals in soil beneath the building slab. Fill materials, migration pathways (pipes and floor drains), and historic operation of the Property for automotive purposes may have also contributed to heavy metals identified in soil beneath the building slab. Hazardous building materials, including asbestos containing materials, have also been identified in the former garage structure.

The Former Cumberland Farms is located at the intersection of John Fitch Highway and Lunenburg Street in Fitchburg, in a commercial/industrial zone. The Site is improved with an approximately 1,902-square foot single-story building which was constructed circa 1957. A gasoline filling station and automotive service business operated at the Site in the 1960s and 1970s. From circa 1977 to 1995, the Site was operated as a Cumberland Farms (gas station chain). The Site was most recently occupied by a Dunkin' Donuts (fast food restaurant chain) before being vacated in 2021. The City purchased the Site in February 2024. Demolition of the building is planned for spring of 2026. This Site is contaminated by hazardous materials.

Our site assessments identified semi-volatile organic compounds (SVOC) and heavy metals in soil at concentrations exceeding applicable state regulatory standards. These hazardous constituents were co-located with additional contaminants, including volatile organic compounds (VOC) and polychlorinated biphenyls (PCBs), detected at concentrations below state regulatory standards. The presence of these compounds is attributable to historic operation of the Site for automotive repair and service purposes.

7. Brownfields Site Definition

Each site meets the definition of a brownfield site under CERCLA § 101(39) as described in the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k). The sites are a) not listed or proposed for listing on the National Priorities List; b) not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and c) not subject to the jurisdiction, custody, or control of the U.S. government.

8. Provide the date of the Phase II or equivalent report

Draft Phase II Comprehensive Site Assessment Report, 173 Bemis Road, Fitchburg, MA 01420: December 2025.

Limited Hazardous Building Materials Inspection Report, 173 Bemis Road, Fitchburg, MA 01420: July 2022

Phase II Environmental Site Assessment Report, 580 John Fitch Highway, Fitchburg, MA 01420: September 2025

The above-referenced investigations included advancement of soil borings, collection of soil samples for laboratory analysis, installation of shallow groundwater monitoring wells, and collection of groundwater samples for laboratory analysis. Samples of building materials were also collected at both Sites and tested for asbestos. The investigation conducted at 173 Bemis Road also included collection of soil samples and soil gas samples from beneath the building slab. These investigations were performed in accordance with applicable Massachusetts rules and guidance on site investigations pursuant to MassDEP's Waste Site Cleanup Program.

9. Site Characterization

Please find attached a letter from the Massachusetts Department of Environmental Protection (MassDEP) regarding site characterization and the current inclusion of the Sites in MassDEP's Waste Site Cleanup Program. A sufficient level of site characterization has been conducted at the Former Bemis Road Garage for remediation work to begin at that Site. The City is currently conducting a supplemental soil sampling program at 580 John Fitch Highway to further evaluate the soil conditions and support cleanup design. This additional investigation, in conjunction with the previous investigation, will yield a sufficient level of site characterization at the Former Cumberland Farms for remediation work to begin and will be completed by June 15, 2026.

10. Enforcement or Other Actions

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

11. Sites Requiring a Property-Specific Determination

The City affirms that the proposed Sites do not require a Property-Specific Determination as they do not fall under the "special class" of properties listed in CERCLA 104 (k).

12. Threshold Criteria Related to CERCLA/Petroleum Liability

12.a Property Ownership Eligibility - Hazardous Substance Site (Former Cumberland Farms, 580 John Fitch Highway)

12.a.ii Exceptions to Meeting the Requirement for Asserting an Affirmative Defense to CERCLA Liability

12.a.iii. Landowner Protections from CERCLA Liability

12.a.iii.1 Bona Fide Prospective Purchaser Liability Protection

Prior to the City of Fitchburg purchasing **580 John Fitch Hwy**, the City worked with the firm of Fuss & O'Neill to conduct all appropriate inquiries (AAI) through the completion of a Phase I Environmental Site Assessment (ESA) in accordance with ASTM E1527-21 standard practice, as part of our due diligence procedure. The Phase I ESA was initiated in December of 2023 and completed in January 2024, and the City purchased the property in February of 2024. The City of Fitchburg is not liable in any way for the contamination found at the Site nor is the City affiliated with any party potentially liable for the contamination. All disposal of hazardous

substances at the Site occurred prior to the City taking ownership. Since taking ownership the City has monitored the Site for trespassers and maintained impervious ground cover (i.e. asphalt pavement) to mitigate potential exposure to hazardous substances. The City has also completed a Phase II Environmental Site Assessment and a hazardous building survey in anticipation of undertaking demolition of the on-site building planned for the spring of 2026. The City will comply with all CERCLA information requests and provide full cooperation, assistance, and access to authorized persons. Public notices required under MassDEP regulations were distributed in response to discovery of hazardous substances at the Site. The City will continue to provide all legally required notices related to this Site and will not impede performance of a response action or natural resource restoration.

12.a.iii.1.a Information on the Property Acquisition

The City negotiated the purchase (fee simple) of 580 John Fitch Highway with the previous owner of the Site, Lunenburg Realty Donut, Inc. The date of property acquisition by the City is February 29, 2024. The City is now the sole owner of the Site. The City has no familial, contractual, corporate, or financial relationships or affiliations with any prior owners or operators (or other potentially responsible parties) of the property (including Lunenburg Realty Donut, Inc.).

12.a.iii.1.b Pre-Purchase Inquiry

An AAI-compliant Phase I Environmental Site Assessment of 580 John Fitch Highway was completed in January 2024 by an Environmental Professional (as defined in 40 CFR 312.10) from the firm of Fuss & O'Neill on behalf of the City. The Phase I ESA includes the written declaration by the Environmental Professional (in accordance with 40 CFR 312.21(d)) and the Site Assessment was conducted in conformance with American Society for Testing and Materials (ASTM) Practice E1527-21, Standard Practice for Environmental Site Assessments, Phase I Environmental Site Assessment Process (ASTM, 2021). The Site Assessment was initiated in December of 2023 and completed in January of 2024, prior to the City's purchase of the Site in February of 2024.

12.a.iii.1.c Timing and/or Contribution Toward Hazardous Substances Disposal

All disposal of hazardous substances at the Site occurred before the City acquired the property at 580 John Fitch Highway. The City did not cause or contribute to any release of hazardous substances at the Site nor has the City, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

12.a.iii.1.d Post-Acquisition Uses

The Former Cumberland Farms Site at 580 John Fitch Highway has remained unused and vacant since the City's acquisition of the Site in February 2024 to the present.

12.a.iii.1.e | Continuing Obligations

Since taking ownership the City has completed a Phase II Environmental Site Assessment which included an evaluation of risk posed to human health by hazardous substances. This Phase II ESA confirmed that there are no continuing releases or threats of future release. We have also completed a hazardous building survey in anticipation of undertaking demolition of the on-site building planned for the spring of 2026. The City regularly monitors the Site for evidence of

trespassing to ensure the building and Site remains secure. The pavement at the Site is maintained to mitigate potential exposure to impacted soil. The City has filed a Notice of Intent with the Conservation Commission, reviewed by MassDEP, and an order of conditions will be followed for all cleanup work on the site. The City (owner) will provide access to the Site as needed to facilitate cleanup, comply with all CERCLA information requests, and provide all legally required notices related to this Site.

12.b Property Ownership Eligibility - Petroleum Site (Former Bemis Road Garage, 173 Bemis Road)

Please find attached a copy of our State Eligibility Determination Letter for 173 Bemis Road.

12.b.i Information Required for a Petroleum Site Eligibility Determination

12.b.i.1 Current and Immediate Past Owners

The City of Fitchburg is the current owner of the 173 Bemis Road. The immediate past owner is Richard Burt Enterprise LLC.

12.b.i.2 Acquisition of Site

The City took 173 Bemis Road through tax foreclosure in May 2022.

12.b.i.3 | No Responsible Party for the Cleanup of the Site

The current Owner (the City) has not dispensed or disposed of petroleum on the Site, nor exacerbated existing petroleum contamination on the Site. The City did not own the Site during the dispensing or disposal of petroleum. Since acquiring the Site, the City took reasonable steps with regard to the petroleum release, including performance of Phase II ESA activities to ensure that there were no on-going releases. The City also coordinated the legal disposal of drums of waste oil that remained at the Site at the time of the City's acquisition. Because the City took the property via tax title, the City is exempt from liability while it maintains statutory requirements set forth in Section 2 of M.G.L. c. 21E (e.g. municipal tax lien exemption).

The immediate past owner (Richard Burt Enterprise LLC) was responsible for dispensing and disposing of petroleum identified at the Site. Richard Burt Enterprise LLC owned the Site at the time the petroleum was disposed. However, as described in the attached State Eligibility Determination letter, because the immediate past owner was subject to voluntary dissolution by the Secretary of the Commonwealth and the LLC did not appear to own assets other than the Site, that entity is not considered to be a currently financially viable party.

12.b.i.4 Cleaned Up by a Person Not Potentially Liable

The applicant (the City) has had no role in the events that led to the contamination of 173 Bemis Road. As noted above, the City did not dispense or dispose of petroleum or petroleum products, or exacerbate the existing petroleum contamination, at the Site. Since acquiring the Site, the City has taken reasonable steps in response to the contamination, including working diligently to assess the extent of the contamination and now seeks funding to remediate the issue. The City retained a licensed environmental contractor to safely remove and legally dispose of drums of waste oil which were generated prior to the City's acquisition of the Site.

The City has also submitted environmental assessment and response action reports required under MassDEP regulations, which have returned the Site to a status of regulatory compliance.

12.b.i.5 Judgments, Orders, or Third Party Suits

There are no judgments rendered in a court of law, administrative orders, enforcement actions by State or federal authorities, or third-party claims that identify and require a responsible party to assess, investigate, or cleanup this property.

12.b.i.6 Subject to RCRA

This property is not subject to any order under §9003(h) of the Solid Waste Disposal Act.

12.b.i.7 Financial Viability of Responsible Parties

The immediate past owner of the Site, Richard Burt Enterprise LLC, was subject to voluntary dissolution by the Secretary of the Commonwealth and the LLC did not appear to own assets other than the Site. Therefore, the immediate past owner does not have the financial capacity to satisfy obligations under federal or State law to assess, investigate, or cleanup the Site.

13 a. and b. Cleanup Authority and Oversight Structure

The City of Fitchburg will be responsible for oversight of the clean-up work on these Sites. Both Sites are currently enrolled in the State Waste Site Cleanup program. To aid in oversight of the cleanup, the City will work with an outside qualified environmental professional procured in accordance with provisions of 2 CFR §§ 200.317 through 200.326 to provide the technical expertise to guide the project. The Cleanup activity will not extend beyond the boundaries of the Sites and access to adjacent or neighboring properties will not be needed.

14. Community Notification

A Draft Analysis of Brownfield Cleanup Alternatives (ABCA) for each of the proposed Sites are attached. Proof of Publication of the newspaper ad published on January 13, 2026, is attached. The public meeting was held on January 26, 2026. A summary of the public meeting is attached.

15. Named Contractors or Subrecipients

Contractors. N/A

Named Subrecipients. N/A



Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs

Department of Environmental Protection

Address: 100 Cambridge Street, Suite 900, Boston MA 02114 | Phone: 617-292-5500

Maura T. Healey
Governor

Kim Driscoll
Lieutenant Governor

Rebecca Tepper
Secretary

Bonnie Heiple
Commissioner

January 20, 2026

[Via Email]

Attn: Mayor Samantha Squailia
City of Fitchburg
718 Main Street, Fitchburg, MA 01420

RE: STATE LETTER OF ACKNOWLEDGMENT

***City of Fitchburg – Brownfields Cleanup Grant
173 Bemis Road, Fitchburg [RTN 2-18060] and
580 John Fitch Highway, Fitchburg [RTN 2-52757]***

Honorable Mayor Squailia:

I am writing to support the application submitted by the City of Fitchburg (the City) under the Fiscal Year 2026 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. It is the understanding of Massachusetts Department of Environmental Protection (MassDEP) that the City is proposing to undertake cleanup activities at the following two properties:

173 Bemis Road [RTN 2-18060]

Prior to the City taking ownership, historic commercial activities at the property included a gasoline filling station, automotive service center, an auto radiator service shop, and a custom exhaust facility. These operations resulted in contamination [metals, petroleum, and polycyclic aromatic hydrocarbons (PAHs)] in soil and groundwater. The EPA cleanup grant will be utilized to remediate the environmental concerns at this site to facilitate the redevelopment of the property and adjacent Bemis Road/Intervale Road intersection to support new development on Intervale Road. Demolition of the building will be a part of the cleanup efforts to facilitate remediation of waste-oil contamination in soil below the building footprint.

The City took ownership of the property through tax title foreclosure in May 2022, and the site is enrolled in the MassDEP waste site cleanup program. According to information provided by the City, the level of assessment conducted to date is sufficient to design and initiate the proposed cleanup activities.

580 John Fitch Highway, Fitchburg [RTN 2-52757]

Prior to the City taking ownership, historic commercial activities at the property included a gasoline filling station, automotive service facility, and a fast-food restaurant. Operations at the site resulted in contamination (lead and PAHs) in soil. The City plans to utilize the EPA cleanup grant to remediate the environmental concerns at this site to facilitate the redevelopment of the intersection of John Fitch Highway and Lunenburg Road. This infrastructure improvement will improve parking and traffic issues in this high-volume commercial corridor.

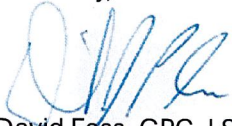
STATE LETTER OF ACKNOWLEDGMENT
City of Fitchburg – Brownfields Cleanup Grant

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The City took ownership of the property in 2024, and the site is enrolled in the Massachusetts Department of Environmental Protection (MassDEP) waste site cleanup program. According to information provided by the City, additional pre-remediation assessment is planned funded with the City's EPA Community Wide Assessment Grant. The City's QEP has prepared a QAPP Modification to conduct supplemental soil sampling to refine the nature and extent of the soil release conditions and support remedial design. The City has committed that the supplemental assessment shall be completed by June 2026.

In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available resources and incentives. MassDEP, through our regional offices, provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our state and federal partners to support the City of Fitchburg to help make this project a success. We greatly appreciate EPA's continued support of Brownfield efforts in Massachusetts.

Sincerely,



David Foss, CPG, LSP

Statewide Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Liz Murphy, Executive Director, Community Development and Planning Department
Amy LeBlanc, Senior Project Manager, Community Development and Planning Department
Katy Deng, US EPA Region 1
Kevin Daoust, MassDEP Central Regional Office