



Town of Adams • Massachusetts 01220

ADAMS TOWN HALL
8 PARK STREET
TEL. (413) 743-8300

APPLICATION INFORMATION SHEET

(1) Applicant Identification

Town of Adams
8 Park Street
Adams, MA 01220-2053

(2) Website URL – <https://www.town.adams.ma.us/>

(3) Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested: \$4,000,000

(4) Location

- a. Town: Adams
- b. County: Berkshire
- c. State: Massachusetts

(5) Property Information

Curtis Fine Papers
115 Howland Avenue
Adams, MA 01220

(6) Contacts

a. Project Director
Donna Cesan, Interim Community
Development Director
Phone (413) 743-8300 x131
dcesan@town.adams.ma.us
8 Park Street
Adams, MA 01220

b. Chief Executive
Nicholas Caccamo, Town
Administrator
Phone (413) 743-8300 Ext. 102
ncaccamo@town.adams.ma.us
8 Park Street
Adams, MA 01220

(7) Population – 8,166

(8) Other Factors Checklist

Other Factors	Page #
Community population is 15,000 or less.	1
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3

The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous with a 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).	
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	3
The reuse of the proposed site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	1 & 3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

(9) Releasing Copies of Applications

The application does include confidential business information (CBI), trade secrets or other confidential, privileged, or sensitive information.

NARRATIVE

(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfields Challenges and Description of Target Area

The Town of Adams, MA (pop. 8,166) lies 175 miles west of Boston in the northern Berkshires along the banks of the Hoosic River. Incorporated in 1778, Adams began as a Quaker farming community but was soon caught up in the industrialization across New England. By 1850 industrial workers outnumbered farmers. The Town emerged as a primary manufacturing center with the success of the Berkshire Mills in the late 1800s and reached its peak population of 13,525 residents in 1925. However, Adams has very much changed from its peak in population with the significant decline of the northern Berkshires industrial economy. While some industrial manufacturing employers remain, Adams has become predominantly a bedroom community.

There are 84 known hazardous release sites in Adams according to the Massachusetts Department of Environmental Protection (MassDEP). The Target Area for this project is the Route 8 corridor, a north/south commercial/industrial corridor that runs through the core of the Town. The corridor encompasses the downtown and is intermixed with dense residential neighborhoods, former mill housing, commerce and industry. Vacant often dilapidated brownfields within the Target Area pose a real safety and environmental concern. The brownfield sites within the Target Area are blighted properties that detract from the community character of the Target Area and create a sense of disregard and neglect that discourages investment in the community. Residing and working adjacent to the Brownfield sites in the community put sensitive populations at risk of exposure to contaminants on a daily basis via dermal contact, ingestion, and/or inhalation. This includes contaminated soil, groundwater, and sediments that spread across the Target Area during extreme weather events, as well as soil, gas, air and hazardous building materials (HBM) associated with these sites. **As one of the largest potential development sites in the Town, the blighted, hazardous condition of the former Curtis Fine Papers site presents a severe and urgent need for Adams.** This grant is a critical next step to address the challenges and impacts that result from known and suspected contamination and will advance the most prominent site within the corridor to cleanup and productive reuse.

b. Description of the Proposed Brownfields Site

The Curtis Fine Papers site (the Site) is an 11.8-acre parcel located at 115 Howland Avenue in Adams, Berkshire County, Massachusetts. The Site is located within the Town's northern gateway, in a mixed residential and industrial area approximately 2 miles north of the downtown. It is bounded on the west by Route 8 and on the east by a rail line. The Site includes the former factory building, an office building and three outbuildings. The three outbuildings consist of a workshop and two water processing buildings. Two groundwater extraction well houses, a 100,000-gallon No. 6 fuel oil storage tank, and a non-contact cooling water pond are all located on the Site.

Historically, the Site was owned and operated by several paper companies, including Curtis Papers, Inc., (formerly known as Royal Blue Papers, Inc.) and prior to that by Crown Paper Company and the James River Company, Inc. In October 2003, Curtis Papers filed for bankruptcy and all mill operations ceased. Much of the manufacturing equipment was removed from the facility, and the property remained vacant until MJD Real Estate purchased the property in June 2009. The site has been operated by multiple industrial tenants, which used numerous types of petroleum and hazardous materials including chlorinated solvents for the manufacturing of plastic goods, bicycle frames, and paper.

The Site consists of five (5) main buildings (totaling 228,000 ft²), all in various stages of disrepair. Located on the west side of the facility is a standalone workshop (Building 1). The main mill complex

(Buildings 2, 3, and 4) includes a boiler room, hazardous waste storage room, mill equipment room, and other rooms used for chemical and paper storage. An office building (Building 5) is connected to the main building by a narrow passageway, and a well house on the east side of the main building. A 259,000-gallon open reservoir on site was historically used for fire suppression.

In April 2020, the EPA, Region 1, Emergency Planning and Response Branch (EPRB), EPA's Superfund Technical Assessment and Response Team (START) and EPA's Emergency and Rapid Response Services (ERRS) demolished the on-site smokestack, conducted hazardous categorization of container and drum contents, combined and containerized container and drum contents, excavated lead-contaminated soil, and performed site restoration.

Despite these efforts, the site poses a significant safety risk as the buildings have continued to deteriorate. **The Town took ownership of the site in October 2023 due to tax delinquency.** The Town was awarded an EPA Brownfields Community Wide Assessment Grant in 2023. Under that grant a structural assessment of the buildings and a Hazardous Building Materials Investigation (HBMI) were conducted in 2025. The structural inspection identified building conditions that ranged from fair to significantly damaged throughout the mill complex and roof conditions in Buildings 1, 2, 3 and 4 ranged from poor condition to total collapse. The structural inspection concluded that all the buildings have been exposed to water and moisture causing various levels of damage to the structural members. Building 1 and the south portion of Building 4 may be economically viable to repair, while Buildings 2, 3, and the north portion of Building 4 are beyond repair. Severely degraded sections of the buildings prevented complete access due to safety concerns. The HBMI identified asbestos-containing materials (ACMs) in Buildings 1, 4 and 5. Suspect ACMs were observed in Buildings 2 and 3 that were inaccessible and should be assumed to be ACMs. The investigation also identified lead-based paint (LBP), building components containing polychlorinated biphenyls (PCBs), and various universal wastes inside the buildings.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The proposed project is supported by the 2023-2027 Comprehensive Economic Development Strategy (CEDS) for Berkshire County. **Redevelopment of the Site is listed as a priority project for mixed use and commercial site redevelopment within the CEDS.** The CEDS highlights the need to identify and mitigate development constraints (environmental contaminants, functionally obsolete buildings, etc.) on the property in order for the private sector to transition the property to a higher and better use (and contribute to the local economy and tax base). **The proposed cleanup of the site also supports EPA's "Powering the Great American Comeback Initiative", as it will promote Clean Air Land and Water for every American by removing HBM contamination.**

The Town's Community Development Strategy "CD Strategy" represents a comprehensive and integrated approach or "action plan" to address critical issues including enhancing the local economic base. The CD Strategy specifically identifies the Route 8 Corridor, a major north/south highway with almost 18,000 vehicles per day, as a primary focus for economic activity and recognizes its importance as a location for manufacturing in the northern Berkshires. The project Site is prominently located along the Route 8 Corridor, on the Berkshire Regional Transit Authority bus route, served by all public utilities, and along an active rail line (CSX). The prominent location and poor conditions at the Site present a highly visible source of blight and decline within the immediate gateway to the Adams town center.

d. Outcomes and Benefits of Reuse Strategy

The remediation and reuse of the Site is expected to stimulate economic development in the Target Area post-cleanup. As acknowledged within the CEDS, the Site is prime for redevelopment as it is located adjacent to a major transportation route (Route 8), as well as active rail. Its relatively large size allows the potential for multiple uses. **Remediation and reuse will provide important public health,**

employment, and fiscal benefits to the community at large, and will stimulate economic development and job creation upon completion of the cleanup activities. Given the continuing interest in this Site, its advantageous location on Route 8, the Town’s planning and revitalization goals and zoning regulations, the Town strongly believes remediation of this Site will lead to the redevelopment of this Site, resulting in job creation and additional tax revenue.

While the reuse of the Site is not likely to improve local resilience to the impacts of extreme weather events and natural disasters, **in its current condition, the Site is extremely vulnerable to the impacts of extreme weather events and poses a real hazard.** Local zoning allows rooftop and small-scale solar by-right, providing for the inclusion of renewable energy. The reuse of the Site could facilitate the development of renewable energy from solar, or geothermal energy and will incorporate energy efficiency measures, supporting the Great American Comeback Initiative.

Strategy for Leveraging Resources

e. Resources Needed for Site Characterization

The Town was awarded an EPA Brownfields Assessment Grant in 2023. This funding has allowed for the structural assessment and HBMI conducted at the Site. Grant funding has not yet been exhausted, and the Site remains a priority for the Town if further characterization of the Site is needed for the remediation to continue. If needed, the Town would seek additional support from the Berkshire Regional Planning Commission (BRPC) through their Brownfields Program.

f. Resources Needed for Site Remediation

The Town has committed an additional \$100,000 toward the completion of the remediation and/or reuse planning at the Site if sufficient funds remain. The Town has initiated the process of requesting a \$500,000 subgrant from BRPC’s Brownfields Revolving Loan Fund (RLF) to complete the remediation. RLF funds are available and the Town has BRPC’s full support.

g. Resources Needed for Site Reuse

The Town has successfully leveraged a variety of other funding sources and incentives to help remediate brownfields and bring them back to productive use. The Town is eligible for funding from both federal and non-federal resources and is committed to pursuing these resources that have successfully been utilized in the past to support the reuse of the Site. EPA Brownfields Cleanup Funding is critical as the first step toward leveraging other funding sources. Key funding resources that will be sought to support site reuse include MassDevelopment funds, MassWorks, Rural Development Fund program, and Community Development Block Grant (CDBG) funds.

h. Use of Existing Infrastructure

The Site is within a heavily developed area and is already served by existing infrastructure, including rail. The need is not to expand and extend roads and utility services, but to renew facilities where they already are, in order to continue to serve existing neighborhoods and industry. This grant will facilitate the use of existing infrastructure at the Site, rather than encouraging development in previously undeveloped areas without existing infrastructure. Additional infrastructure is not needed to carry-out revitalization plans for the Site; however, remediation of known contamination is needed in order to take full advantage of the existing infrastructure.

(2) COMMUNITY NEED & COMMUNITY ENGAGEMENT

Community Need

a. The Community’s Need for Funding

The Town of Adams is considered an EPA micro community with a population of just 8,166. According to data from the US Census American Community Survey 2019-2023, the median household income within the Target Area is \$54,000, significantly lower than the national average of \$78,538 and

state median household income of \$101,341. Therefore, the Town's small size and low-income are just two factors that limit the Town's ability to draw on other initial sources of funding to carry out environmental remediation and subsequent reuse of the Site. The pervasive industrial decline and other significant economic disruptions within the Town have resulted in direct impacts to the local economy. The Town has suffered population loss, concentrated in the outmigration of younger, working age residents. Meanwhile the Town's ability to increase its investments in cleanup and reuse of brownfields is hindered by the inability to continually raise taxes on an already-burdened population. More than half of the Town's budget is dedicated to education, and operational and capital costs for the schools continue to increase even as enrollments decline. State Aid to the Hoosac Valley Regional School District has remained flat or declined over the past 6 years, meaning the member towns, including Adams, shoulder more of the financial burden every year. This grant is necessary to meet the needs of the community to advance the remediation of this critical Site and overcome the obstacles to redevelopment and reuse that the community is currently faced with.

b. Health or Welfare of Sensitive Populations

Over half of the people within the Town (58.2%) can be classified as belonging to a sensitive population: minorities (4.3%), children (14.1%), women of childbearing age (14.9%), and over 65 years old (27.3%). The population over 65 years old is notable in that it is significantly higher compared to the 16.8% nationally. Additionally, 14.0% of the population are people with disabilities, compared to 13.0% nationally.¹ According to a recent survey conducted by the Town, people are concerned about the diminishing quality of life in their neighborhoods and perceive a loss of spirit and cohesiveness. The Site is prominently located on the Route 8 corridor, the main highway connecting Pittsfield and North Adams with over 17,500 vehicles per day, which increases risk to exposure, exacerbating health issues. **Within the northern gateway to the town center, the highly-visible Site is vacant, boarded-up, with visible collapsed roofs and broken windows and unable to be used due to hazardous contamination and structurally unsound buildings. The site also represents a lack of investment and resources in the town, causing further loss of community spirit and connectivity.**

The welfare of the community living within the Target Area is impacted by the blight associated with the Site as well as safety concerns. Some of the lowest income families within the Town live in dense neighborhoods within the Target Area that were once mill housing. The existence of brownfields within the Target Area fosters a sense of disinvestment and neglect within an already struggling community.

This grant will address the blight and safety hazard posed by structurally unsafe building conditions and reduce related threats, including those posed by potential exposure to hazardous materials. The ultimate reuse of the Site will be a highly visible, tangible investment in the community which is expected to create job opportunities and increase the tax base.

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

Berkshire County ranks 13th out of 14 Massachusetts counties in the county-wide health rankings released by the Robert Wood Johnson Foundation. The Target Area experiences a higher prevalence of asthma (12.5%) compared to 10.6% nationally and 9.9% prevalence of cancer, compared to 9.0% nationally.² The Massachusetts Community Health Information Profile, which maintains county-level data to monitor health status indicators, and evaluate health programs indicates that the rate of asthma related emergency room visits, deaths from chronic disease, and breast cancer deaths in the County are all above the state rates. Notable differences exist for both women of childbearing age and minorities. According to the Massachusetts Cancer Registry, cancer incidence within the Town of Adams is higher than expected for the following cancers: breast (invasive), brain and other nervous system, Non-Hodgkin

¹ Data from the US Census American Community Survey 2019-2023

² PLACES: Local Data for Better Health

Lymphoma, esophagus, kidney and renal pelvis, leukemia, and Hodgkin Lymphoma. Brownfields sites can lead to disproportionate adverse impacts to sensitive populations including HBM and asbestos (lung scarring, mesothelioma and lung cancer) and PCBs (immune, hormone and neurological system; liver and skin disease). The cleanup activities conducted under this grant will protect against exposure and reduce the threats associated with contamination that can lead to adverse health conditions. Remediation and redevelopment will remove the threats associated with the unsafe buildings, improving public health outcomes and creating a cleaner environment for all Adams residents.

d. Economically Impoverished/Disproportionately Impacted Populations

This grant and the projected site reuse will address and reduce threats to populations in the Target Area that are economically impoverished and disproportionately share the negative environmental consequences resulting from industrial, governmental, and/or commercial operations or policies.

As of November 2025, the unemployment rate in Adams (6.5%) is notably higher than the national average (5.2%).³ The poverty rate (14.7%) is also significantly higher than the state average of 10% and the national average of 12.4%. The median household income within the Target Area is \$54,000, significantly lower than the national average of \$78,538 and just over half of the state median household income of \$101,341.⁴ In addition to the presence of brownfields, the Target Community is impacted by various cumulative environmental issues including those represented by the flood control chutes, the presence of ongoing industrial activity, and impacts to the community associated with both rail and highway traffic. Route 8 is the primary north-south artery through Berkshire County and runs parallel to the site with over 17,500 vehicles per day and Adams is a non-attainment area for Ozone 8-hour. **Traffic studies conducted in the region conclude that the high number and proportion of trucks in the Target Area have significant impacts, including detrimental air quality issues, noise impacts and safety impacts.** These environmental burdens represent an industrial legacy within Adams that has disproportionately and negatively impacted the health and safety of its residents.

This grant will address the blight and safety hazardous posed by structurally unsafe buildings and reduce related threats, including those posed by potential exposure to hazardous materials. The Site cleanup will protect against exposure and reduce the threats associated with contamination that can lead to adverse health conditions, and redevelopment will remove the threats associated with vacant, abandoned buildings. The projected reuse will be a highly visible, tangible investment within the Target Area that will create jobs to minimize poverty and boost local economy and improve the tax base.

Community Engagement

e and f. Project Involvement and Project Roles

Adams is a small town in which organizations across a wide variety of venues tend to know each other and work together consistently, often at a very personal level. The following community-based organizations have committed to providing support to the Town and facilitate community engagement with smaller neighborhood community groups impacted by the Site.

- **Northern Berkshire Community Coalition (NBCC):** a non-profit organization, located in North Adams, whose mission is to improve the quality of life in northern Berkshire County by organizing, supporting, and empowering the community. Role: use their monthly forums as a venue to assist the Town in providing information to affected neighborhoods and facilitate community engagement and involvement. Contact: Amber Besaw abesaw@nbccoalition.org
- **1Berkshires:** the county-wide economic development organization, marketing the region to create jobs and a sound local economy. Role: identify potential reuse opportunities and communicate the project with the business community. Contact: Ben Lamb blamb@1berkshire.com

³ Unemployment Rates in Massachusetts | Mass.gov

⁴ Data from the US Census American Community Survey 2019-2023

- **Youth Center, Inc.:** provides social, educational and recreational opportunities, for the youth and families of Adams, Cheshire and Savoy. Role: help to publicize the project, host presentations, and serve as a liaison for the community. Contact: Sonia DiSantisonia@youthcenterinc.org

g. Incorporating Community Input

The Town will maintain a high level of community engagement by a range of venues. Public discussions held as part of regular meetings of the Selectmen, subcommittees of the Selectmen, the downtown committee, and other meetings involving members of the public are a tried-and-true method for engaging community members. Public meetings concerning the project will be held at the Adams Town Hall or at the Adams Visitors Center (both within the Route 8 corridor). The date and time of any public meetings will be advertised in The Berkshire Eagle at least a week prior, posted on the Town Clerk's Notice Board at Town Hall, and on the Town of Adams website. Meetings of the Selectmen are televised. The Town's Community Development Department will be an on-going source of general information to the public on the site remediation. Various media will also be utilized including public notices, press releases, the Town's website, community access television, and presentations before community organizations.

Town staff is already actively engaged in the Target Area – CD staff already has in place a mailing list of every property owner within the Target Area and frequently sends out mailings to this list regarding upcoming meetings on progress with the Town's community development strategy and the CDBG program. The Town will extend the community engagement process by working in partnership with other organizations, including NBCC, the Youth Center, Inc., and 1Berkshire.

The Town will provide opportunities for public input and two-way communication to ensure the proposed cleanup activities are conducted in a manner that is protective of sensitive populations and nearby residents. The Qualified Environmental Professional (QEP) will complete the site-specific Community Involvement Plan (CIP), which will set forth in greater detail how the community can be involved in the project. The Town will ensure that two-way, responsive communication is maintained throughout the duration of the project to communicate the progress to citizens. This will ensure that community can provide meaningful input and feedback, and that the Town can build trust with residents in addition to answering questions and responding to comments. Methods of communicating with the public are expected to include flyers, social media, and project email/contact will be adjusted as needed to ensure that they are both appropriate and effective.

(3) TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Severe deterioration has compromised the structural integrity of the onsite buildings and has prevented access to potentially impacted soils beneath the building footprints that may require remediation. Asbestos, lead-based paints (LBP) and PCB-containing materials within unstable and exposed areas of the building also provide a direct pathway for release(s) to the environment. Many of the site buildings are derelict, unsafe and cannot be restored or reused for any purpose. As documented in the attached ABCA, two HBM cleanup options were evaluated: abatement and stabilization, and abatement concurrent with full building demolition. The engineer's cost estimates indicated that abatement with full demolition would cost \$1.01M less than abatement and stabilization; the higher cost of the no-demolition option was primarily due to additional engineering design and planning needed to secure the buildings' superstructure and high cost of stabilizing and maintaining the deteriorated buildings to render them safe. Therefore, demolition of Buildings 1, 2, 3 and 4 and bulk removal of the hazardous building materials (HBM) from these structures is necessary and the entire waste stream will be disposed in accordance with State and federal regulations. HBM abatement without full demolition of Building 5 was determined to be cost-effective and the proposed cleanup plan will involve abatement without demolition of Building 5. In addition to the removal of hazardous building materials, numerous drums,

totes and tanks of hazardous substances located within the building interiors will be removed and disposed of at applicable licensed disposal facilities. Hazardous building material abatement will address public safety concerns and decrease the potential release of hazardous substances from the dilapidated structures during the redevelopment process.

Description of Tasks/Activities & Outputs - No Non-EPA grant resources are needed to carry out the tasks/activities described below.

Task 1: Cooperative Agreement Oversight:
b. <u>Project Implementation:</u> The Town will solicit the services of an experienced Brownfields grant manager and a QEP in accordance with all applicable procurement laws. The grant manager will ensure that all federal cross-cutting measures are met, such as Davis Bacon and BABA. EPA quarterly reports (QRs), annual FFR reports, updates to the Assessment, Cleanup and Redevelopment Exchange System (ACRES) database and requests for reimbursement will be prepared and submitted by the grant manager with assistance from the QEP. The Town will maintain project files and information repository. A member of the project team will attend the National EPA Brownfields Conference. Monthly Status meetings with Town, EPA, Grant Manager and QEP
c. <u>Anticipated Project Schedule:</u> The grant manager and QEP will be procured in Q1. Quarterly Reports submitted within 30 days after the end of each reporting period (Jan/April/July/Oct). Annual FFR submitted by October 30 of each grant year. ACRES updated following each milestone. Final Closeout report submitted within 90 days after end of cooperative agreement period.
d. <u>Task/Activity Lead:</u> Town will lead procurement tasks for grant manager and QEP. Grant manager will oversee cooperative agreement (CA) reporting requirements (i.e. QRs, ACRES, FFR). QEP will provide technical & programmatic assistance and oversee construction activities. Attend EPA National Brownfield Conference in May 2027
e. <u>Outputs:</u> Signed contracts with a grant manager and a QEP that meet the recipient’s and EPA’s expectations; information repository developed; monthly status meetings, 16 quarterly reports; ACRES to track program measures; FFR reports; Closeout Report, a member of the Team will attend the EPA National Brownfield Conference.
Task 2: Community Outreach and Engagement
b. <u>Project Implementation:</u> Community outreach and engagement will focus on gathering input from residents and community stakeholders in the Target Area. The QEP will develop a Community Involvement Plan (CIP) which will detail the steps to ensure adequate public notice and the opportunity for the community to provide input on the proposed cleanup plan and respond to comments. Public notice of the draft ABCA will be provided and presented at a public meeting with a 30-day comment period for members of the community to review and provide their input. Written responses to public comments will be incorporated into the finalized CIP and ABCA. Reports and other materials will be posted to the town’s website. The Town will hold four public meetings and provide ongoing communication to EPA and MassDEP.
c. <u>Anticipated Project Schedule:</u> Community engagement activities would begin Spring 2027 with generation of CIP and continue through Spring/Summer 2030.
d. <u>Task/Activity Lead(s):</u> The Town with assistance from the grant manager will lead this task. QEP will be the Town’s partner, providing support with technical expertise and other community outreach assistance. The grant manager and QEP will review deliverables to ensure compliance with state/federal programmatic requirements.
e. <u>Output:</u> CIP, Final ABCA, meeting minutes, presentation materials, and fact sheets responses to community input, four public meetings.
Task 3: Cleanup Activities, Oversight and Compliance
b. <u>Project Implementation:</u> QEP will prepare documentation required for cleanup implementation, including a Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), Remediation /

Engineering Plans & Specifications, and EPA / state required documents and Remedial Action Plans. Town will prepare a public bid package with support from QEP for the procurement of a cleanup contractor in accordance with state regulations. QEP will provide bid support to the Town during competitive procurement process. Cleanup contractor will implement cleanup tasks with oversight from QEP. QEP will oversee building demolition and hazardous building materials abatement, and removal/disposal of drums, totes, tanks and electric transformers. During site remediation, the QEP will perform observation activities and document activities in the field to ensure cleanup is performed in compliance with the EPA approved ABCA and state requirements. QEP will prepare and submit state required Remedial Action Plan, weekly Status Reports, and Cleanup Completion reports to the MassDEP and EPA. QEP will issue closure report to MassDEP and EPA. QEP will also ensure Davis Bacon compliance.

c. Anticipated Project Schedule: Spring / Summer 2027: Generate cleanup plans, remediation / engineering designs and specifications, issue invitation for bids for cleanup contractor. Fall/Winter 2027: award cleanup contractor, secure permits. Spring/Summer 2028: Commence site remediation. Fall / Winter 2028: Complete site remediation related field tasks. Final documentation and Cleanup Completion report is anticipated in Spring/Summer 2029.

d. Task/Activity Lead: Town will lead procurement of cleanup contractor with QEP support. QEP will prepare ABCA, QAPP, EPA & State reports and remedial engineering plans & specifications and provide bidding support. Town will review deliverables to ensure compliance state/federal Brownfields requirements. Cleanup contractor will obtain permits and implement specified cleanup tasks with QEP support / oversight. QEP will provide technical oversight, provide documentation for materials required to be disposed of off-site, and document remedial activities for compliance with applicable MassDEP/EPA standards & requirements. Town will review deliverables to ensure compliance state/federal regulatory and programmatic requirements.

e. Outputs: HASP, QAPP, remedial engineering plans & specifications, bid documents, site remediation & restoration. Bulk loading, transport and disposal of ~12,800 tons of HBM. Bills of Lading/Manifest, Remedial Action Plan, Status Reports, Cleanup Completion & Closure Report.

f. Cost Estimates

The Town is requesting **\$4,000,000** to complete the tasks above. Costs have been estimated based upon past experience and estimates from environmental contractors and in consultation with the EPA's Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance guidelines. No personnel, fringe, indirect, administration, equipment, supply or other costs are requested and therefore are not included in the cost table. **Only costs to be covered by EPA grant funds are included within the cost estimates and within the budget table.** Funding resources that will be leveraged to meet the remediation budget are discussed under Section 1.c.i. and 1.c.ii. *Resources Needed for Site Characterization and Remediation*

Task 1 – Cooperative Agreement Oversight: Total= \$41,950

Contractual: Grant management expenses of \$16,000 for general Cooperative Agreement Oversight and programmatic assistance, including 16 Quarterly Reports (QRs), ACRES updates, and grant closeout reporting (100hrs @ \$160/hr) plus QEP expenses of \$22,950 for monthly status meetings and general programmatic assistance: budget tracking, ACRES, QRs, BABA compliance, and close out reporting (3hrs/mo x ~45mo @ ~\$170/hr average) Travel: \$3,000 for National Brownfield Conference (registration, airfare, lodging, per diem/1 person)

Task 2 – Community Outreach & Engagement: Total = \$34,000

Contractual: Grant management expenses of \$10,000 (62.5hrs @ \$160/hr) and QEP expenses of \$24,000 for 4 public meetings (\$2,500/mtg x 4), CIP (\$5,000), Final ABCA (\$5,000), and outreach materials (\$4,000).

Task 3 – Cleanup Activities, Oversight and Compliance: Total= \$3,924,050

Contractual: Grant management expenses of \$10,000 to ensure all federal cross-cutting measures are met, assistance to procure cleanup contractors, and conduct Davis Bacon wage monitoring (62.5hrs @ \$160/hr). QEP expenses (\$352,200) include: \$222,200 for final ABCA, HASP, QAPP, Design Plans & Specifications, bidding assistance, EPA required remedial action plans and status documents, and Final Clean Up Completion Report (1,388.75hrs x \$160/hr); and \$130,000 for construction administration and oversight (812.5 hrs x \$160/hr). Construction: Total \$3,561,850 includes \$117,650 site preparation (signage/traffic control (\$2,730), erosion controls (\$27,040), clearing/grubbing (\$3,250), vehicle pad wash (\$5,200) temp fencing/wind screen (\$37,180), permits and submittals (\$35,750), water/utility usage (\$2,600), rodent control (\$3,900); \$33,540 utility disconnect and removal; \$473,720 demo and load out; \$2,496,000 (12,800 tons @\$195/ton bulk loading, transport and disposal); \$104,000 abatement; \$217,100 drums/totes/AST removal; \$119,840 Bonding (~4%). Cleanup costs include contingency and factor of safety for inflation as the work is not expected to occur until 2028.

Budget Categories		Project Tasks (\$)			Total
		Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach & Engagement	Task 3 Cleanup Activities, Oversight & Compliance	
	Travel	\$3,000			\$3,000
	Contractual	\$38,950	\$34,000	\$362,200	\$435,150
	Construction			\$3,561,850	\$3,561,850
Total Direct Costs		\$41,950	\$34,000	\$3,924,050	\$4,000,000
Total Budget (Total Direct Costs + \$0 Indirect Costs)		\$41,950	\$34,000	\$3,924,050	\$4,000,000

g. Plan to Measure and Evaluate Environmental Progress and Results

The Town will procure the services of a grant manager who will work with the Town to track, measure and evaluate our progress in achieving project outcomes, outputs and project results. The Town will develop a Workplan for approval by EPA Region 1 which will outline systems to ensure all outputs and outcomes are tracked throughout the project with accuracy so they can be accurately reflected in acres. This information will be reflected in the quarterly and final reports. ACRES will be utilized to report, document, and track information such as funding received, contamination present, acres cleaned up, acres redeveloped and funds leveraged. The Town will also work closely with our Project Officer, and selected QEP to track, measure and evaluate our progress.

(4) PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure

The Adams Community Development Department (CDD) will be the responsible party for ensuring the timely and successful expenditure of funds and completion of the grant’s technical, administrative, and financial requirements. The Town intends to solicit the services of a grant manager for assistance in meeting the project management and reporting requirements of the grant. The CDD, has managed multiple grant projects in the past including EPA Brownfields Grants and CDBG grants demonstrating a high degree of efficiency and effectiveness in the timely and successful expenditure of funds and completion of all technical, administrative and financial requirements of the grant. There have been no adverse findings on the Town’s federal fund audits.

b. Description of Key Staff

The Interim Community Development Department Director, Donna E. Cesan, will oversee the grant for the Town as she has over 35 years of community planning, development, and grants management experience. Ms. Cesan has managed the Town's Community Development Block Grant program (\$25 million) over the past 24 years. As a member of the American Institute of Certified Planners, she has worked at state and local government levels in development review, program development and management, environmental planning, community and economic development, and as a planning consultant. Ms. Cesan has overseen work on two EPA Community-wide Assessment Grants and one Brownfields Cleanup Grant.

c. Acquiring Additional Resources

The Town will follow federal procurement and EPA guidelines to procure the services of a grant manager and QEP. The Town will work with the selected grant manager to hire an experienced QEP. The QEP will be competitively procured and contractually responsible for ensuring compliance with applicable federal and state requirements, particularly those related to labor practices and local hiring. The Town is well versed in conducting competitive bidding and securing qualified contractors, as it has done under its current Assessment Grant and previous Cleanup Grant. In addition, BRPC, in its capacity as the regional planning agency for the Berkshires, has been a valuable resource to the Town with a dedicated and experienced staff responsible for meeting the various requirements of state and federal agencies. BRPC has a strong track record with EPA Brownfields and is serving as the grant manager for the Town's current EPA Assessment Grant. Based on their experience and the benefit of hiring local partners we plan to include BRPC in the invitee list for the solicitation.

Past Performance and Accomplishments

d. Currently or Has Previously Received an EPA Brownfields Grant

(1) Accomplishments

The Town of Adams was awarded an FY16 EPA Assessment Grant (BF00A00103). This grant was successfully completed and closed out. Six sites were identified and deemed eligible for funding. The Town of Adams was awarded an FY18 Brownfields Cleanup Grant for the Hoosac Valley Coal & Grain Site (BF00A00508). This grant was successfully completed and closed out. The Town has been awarded a FY23 Assessment Grant (BF00A01134). Three sites have been prioritized and deemed eligible for funding, including the Curtis Fine Papers Site. Additional work includes MCP compliance activities, Phase I and II ESAs, site-specific QAPPs, and Health & Safety Plans. The outputs and outcomes are accurately reflected in ACRES. Assessment activities are ongoing and ACRES will continue to be updated accordingly.

(2) Compliance with Grant Requirements

The Town has an excellent history of timely and acceptable quarterly performance, grant deliverables, and ongoing ACRES reporting. The Town has consistently reported progress towards achieving the expected results of the grants in a timely manner. No corrective measures have been needed and there were no funds remaining at the end of the Period of Performance for the FY16 and FY18 assessment and cleanup grants. The Town is in compliance with the Workplan, schedule, and terms and conditions for their open Brownfields Grant (BF00A01134). Funds remain and will be expended on eligible activities by the end of the Period of Performance (7/1/23 – 9/30/27). The Town procured the services of BRPC to serve as grant manager and the services of Weston & Sampson to serve as the QEP for the FY23 Community-wide Assessment Grant. The Project Team works closely and collaboratively with their EPA Project Officer. Progress toward achieving the expected results of the grant are being made in a timely manner. The sites have been entered into ACRES. Quarterly and annual reports have been submitted on time and the project is on schedule and within budget.

Threshold Criteria Responses and Attachments

Threshold Criteria for Cleanup Grants

1. Applicant Eligibility

- a) The Town of Adams (applicant) is a General Purpose Unit of Local Government as defined under 2 CFR 200.1.
- b) The Town of Adams is a municipality and is not exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code.

2. Previously Awarded Cleanup Grants

The Town affirms that the proposed site has NOT received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The Town of Adams does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Town of Adams owns fee simple title to the property located at 115 Howland Avenue, Adams, MA ("Site") Parcel ID 000102-000026. Please see the attached Judgment in Tax Lien Case dated October 19, 2023 and the Instrument of Taking dated July 13, 2016.

5. Basic Site Information

- a) The name of the Site is "Curtis Fine Papers".
- b) The address of the Site is 115 Howland Avenue, Adams, MA 01220

6. Status and History of Contamination at the Site

- a) The Site is contaminated by hazardous materials.
- b) The Site is an 1.8-acre parcel that was first developed in the late 1800s and several interconnecting and standalone buildings were added through the 1970's. The Site was owned and operated by several paper manufacturing companies dating back to 1902. All mill operations ceased in 2003. MJD Real Estate purchased the property in 2009. The Site has been mainly vacant since 2003 and the last of the tenants vacated in 2016. The Site has been operated by multiple industrial tenants, which used numerous types of petroleum and hazardous materials including chlorinated solvents for various industrial processes associated with the manufacturing of plastic goods, bicycle frames, and paper.

The sprawling complex is currently unoccupied and derelict with five (5) buildings in various stages of disrepair. Building 1 (5,000 ft²) was used as a workshop; interconnecting Building 2 (46,000 ft²), Building 3 (82,000 ft²) and Building 4 (86,000 ft²) contained the boiler room, hazardous waste storage room, mill equipment room, and other rooms used for chemical and paper storage; and Building 5 (9,000 ft²) was an office building. Also present on the Site are a cooling water/fire water pond, several small auxiliary buildings, a 100,000-gallon aboveground storage tank and both paved and landscaped areas.

- c) The environmental concerns include hazardous building materials including asbestos, lead-based paint, and polychlorinated biphenyl (PCB) containing materials which pose potential threat of exposure and health risks to people in the surrounding area via windblown dust and debris, and to trespassers or others entering the site. Releases of hazardous building materials may have occurred over the years during roof collapse and building decay. There is concern of the hazardous materials impacting nearby businesses and site visitors/trespassers. The condition of the dilapidated buildings is also a safety concern for those that come onsite.

d) Decades of neglect have led to the current run-down conditions of the onsite buildings (totaling 228,000 ft²). Building conditions range from fair to significantly damaged throughout the mill complex and roof conditions range from poor conditions to total collapse. All the buildings have been exposed to water and moisture causing various levels of damage to the structural supports/members. Buildings 2, 3, and the north portion of Building 4 are beyond repair. A hazardous building materials investigation (HBMI) identified asbestos-containing materials (ACMs) in Buildings 1, 4 and 5. Suspect ACMs were observed in Buildings 2 and 3 that were inaccessible and should be assumed to be ACMs. It is estimated that over 12,630 tons of asbestos containing material is present within the buildings . The investigation also identified lead-based paint (LBP), building components containing PCBs, and various universal wastes inside the buildings.

7. **Brownfields Site Definition**

- a) The Site is not listed or proposed for listing on the National Priorities List.
- b) The Site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
- c) The Site is not subject to the jurisdiction, custody, or control of the United States Government.

8. **Environmental Assessment Required for Cleanup Proposals**

The following Phase II ESA equivalent environmental assessment reports have been completed for the site:

Curtis Fine Paper Facility Structural Assessment Report dated April 7, 2025

Weston & Sampson Engineers, Inc. prepared a Structural Assessment Report, on behalf of the Town of Adams, under their existing community wide assessment grant, which was based on a visual inspection conducted on March 13, 2025. The purpose of the visual inspection was to observe and assess the existing structural conditions to offer professional opinions on which buildings are economically viable to repair, and which should be demolished based on their conditions. A drone was used to capture the existing conditions of the roof and exterior of the buildings.

DRAFT Curtis Fine Paper Hazardous Building Material Investigation Report dated January 22, 2026

In November 2025, Weston & Sampson performed a limited Hazardous Building Materials Investigation (HBMI) of accessible areas of the Site buildings on behalf of the Town of Adams. The HBM assessment and limited sampling of building materials was conducted to identify ACMs, lead paint/coatings, PCBs and other hazardous materials (OHMs) at the Site, as well as to support the property redevelopment and reuse and contribute to the economic revitalization of the surrounding area.

Severely degraded sections of the buildings prevented complete access due to safety concerns. The HBMI identified asbestos-containing materials (ACMs) in Buildings 1, 4 and 5. However, additional suspect ACMs were observed in Buildings 2 and 3 that were inaccessible and should be assumed to be ACMs. The investigation also identified LBP, building components containing PCBs, and various universal wastes inside the buildings.

9. **Site Characterization**

- a) Not Applicable
- b) A current letter from the appropriate State or Tribal Environmental Authority is attached.
- c) Not Applicable

10. **Enforcement or Other Actions**

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

11. Sites Requiring a Property-Specific Determination

The Site does not fall into any special classes of property that would require a property-specific determination to be eligible for federal funding. As documented in the attached ABCA, although PCB contamination is present in building materials, the PCB concentrations do not exceed the 50 ppm threshold for bulk product waste under 40 CFR 761, **and therefore, the site is not subject to TSCA remediation.**

12. Threshold Criteria Related to CERCLA/Petroleum Liability**12.a.) Property Ownership Eligibility – Hazardous Substance Sites****12.a)i) EXEMPTIONS TO CERCLA LIABILITY**

The Town did not own or operate a facility at the time of disposal of a hazardous substance, did not arrange for the treatment or disposal of hazardous substances, or accept hazardous substances for transport to disposal or treatment facilities at the site. The Town is eligible for CERCLA liability protections under the exclusion for state or local governments that involuntarily acquire property (CERCLA §101(20)(D)).

12.a)i)(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

- (a) The Town of Adams acquired the Site for non-payment of taxes through a Tax Lien Judgment.
- (b) The Site was acquired on October 27, 2023.
- (c) All disposal of hazardous substances at the site occurred before the Town acquired the property.
- (d) The Town has not caused or contributed to any release of hazardous substances at the site.
- (e) The Town has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

12.a)iv) Sites with Hazardous Building Material That is Not Released to the Environment

Not applicable. See response to 12.a)i) above.

13. Cleanup Authority and Oversight Structure

- a) The proposed clean up includes the abatement and proper disposal of hazardous building materials, including ACMs, lead paint, PCB containing material and miscellaneous universal wastes located within the Site buildings. The cleanup work will be carried out in accordance with applicable Massachusetts Department of Environmental Protection (DEP) and Division of Local Services (DLS) rules and regulations. Abatement of contaminated building materials prior to building renovation and/or demolition will be conducted pursuant to 310 CMR 7.15, 454 CMR 28.00 and 40 CFR Part 61 Subpart M. Off-Site disposal of contaminated media will be conducted pursuant to the aforementioned regulations. Additional applicable local, state and federal regulatory requirements will also be adhered to, including but not limited to, the Federal Small Business Liability Release and Brownfields Revitalization Act, the Federal Davis-Bacon Act, the Bipartisan Infrastructure Law (BIL) and the Build America Buy America (BABA) Act, as well as town by-laws. Required pre-work notifications for asbestos abatement and other permits will also be completed.

The Town of Adams, with the assistance of a grants manager, will engage competitively procured a Qualified Environmental Professional (QEP) to provide technical expertise to conduct, manage and oversee the cleanup activities. These services will be solicited using competitive procurement practices and in accordance with all federal (2 CFR §200.317 through 200.327) and state requirements. The Town has established procedures that include seeking statements of qualifications and price. Professionals with previous EPA Brownfields experience will be encouraged to compete. This technical expertise will be in place prior to beginning any cleanup activities. The QEP will comply with and submit all required state and federal requirements to ensure that the cleanup project

protects human health and the environment. The Site will be monitored during cleanup activities to ensure that off-site migration of contaminants does not occur as a result of remedial activities. The QEP will also develop necessary design and/or institutional control plans, as needed. All reports will be publicly available at the Town Hall.

Access to adjacent or neighboring properties is not anticipated. If access is needed, the Town will work with property owners to acquire access to the relevant property(ies) and coordinate scheduling. The Town is well versed in making and managing similar access agreements.

14. Community Notification

(a) Draft Analysis of Brownfield Cleanup Alternatives

The applicant allowed the community an opportunity to comment on the draft proposal, including an attached draft Analysis of Brownfield Cleanup Alternatives (ABCA). The draft ABCA was made available for public review at the Town Hall on January 14, 2026. The draft ABCA(s) briefly summarized information about:

- the site and contamination issues, cleanup standards, and applicable laws;
- the cleanup alternatives considered (for each alternative and the alternative chosen include information on the effectiveness, the ability of the grantee to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness); and
- the proposed cleanup.

(b) Community Notification Ad

The Town of Adams provided the community, including those within the Target Area, with notice of its intent to apply for an EPA Cleanup Grant on January 14, 2026. The notice indicated that the Town of Adams is seeking public comment on the draft proposal and draft ABCA and that copies of the draft proposal and draft ABCA are available at the Adams Town Hall Office of Community Development. The advertisement also announced that a public meeting would be held in conjunction with a meeting of the Board of Selectmen on January 21, 2026, at 6PM, during which public comments will be accepted. The public were able to submit comments in person, via telephone or e-mail.

(c) Public Meeting

On January 21, 2026, at 6PM, the Town of Adams held a public hearing to discuss the draft application and consider public comments prior to the submittal of this application. The Town's QEP/LSP presented on the draft ABCA and the draft application. Donna Cesan, Interim Community Development Director, responded to comments received during the hearing from the public and the Select Board. Written comments were also accepted through January 26, 2026. A summary of the public comments received, the applicant's response to those comments, meeting notes of the public hearing, and the meeting sign-in sheet are attached.

(d) Submission of Community Notification Documents

A copy of the draft ABCA, the public notice and solicitation for comments on the proposal, public meeting sign-in sheet, and minutes from the January 21, 2026 hearing are attached. A summary of the comments received and the response to those public comments are also attached.

15. Contractors and Named Subrecipients

- *Contractors:* Not applicable. Contractor(s) will be selected in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 subsequent to award. The Town of Adams will follow public procurement best practices including 40 CFR Part 33, EPA's Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements

and Brownfields Grants: Guidance on Competitively Procuring a Contractor, Massachusetts public procurement law, and any additional applicable guidelines and ordinances, including equitable procurement practices.

- *Named Subrecipients*: Not applicable.

Application Information Sheet Attachment

State Acknowledgment Letter



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 14, 2026

[Via Email]

Attn: Donna Cesan, Interim Community Development Director
Town of Adams
8 Park Street, Adams, MA 01220-2053

RE: STATE LETTER OF ACKNOWLEDGMENT

Town of Adams – Brownfields Cleanup Grant

Curtis Fine Papers – 115 Howland Avenue, Adams [RTN 1-18180]

Dear Ms. Cesan:

I am writing to support the application submitted by the Town of Adams under the Fiscal Year 2026 U.S. Environmental Protection Agency (EPA) Brownfield Cleanup Grant Program. We understand that the Town of Adams is proposing to undertake cleanup activities including abatement of hazardous building materials, removal and disposal of numerous drums and totes of hazardous substances occupying large portions of the buildings' interior, demolition of structurally unsafe buildings, and disposal of hazardous building materials. The Town took ownership of the property through eminent domain, and the site is enrolled in the Massachusetts Department of Environmental Protection (MassDEP) waste site cleanup program, which oversees the cleanup of environmental media. Because this cleanup is primarily focused on hazardous building materials, we rely on the applicant to confirm they have conducted sufficient assessment. According to the Town, the level of assessment conducted to date is sufficient to design and initiate the proposed cleanup.

Proposed redevelopment plans include a mix of commercial spaces, cultural institutions (museum, performing arts venue), residential uses, and/or industrial uses with the goal to facilitate the revitalization of the Route 8 Corridor, which includes downtown Adams.

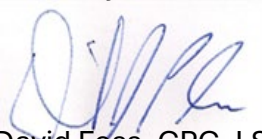
In Massachusetts, state and federal agencies have developed strong partnerships and work together to ensure that parties undertaking Brownfield projects have access to available resources and incentives. MassDEP, through our regional offices, provides technical support to Brownfield project proponents when regulatory issues arise.

STATE LETTER OF ACKNOWLEDGMENT

Town of Adams – Brownfields Cleanup Grant

If this proposal is selected, MassDEP will work with our state and federal partners to support the Town of Adams to help make this project a success. We greatly appreciate EPA's continued support of Brownfield efforts in Massachusetts.

Sincerely,

A handwritten signature in blue ink, appearing to read 'D. Foss', is written over a light blue rectangular background.

David Foss, CPG, LSP

Statewide Brownfields Coordinator, Bureau of Waste Site Cleanup

cc: Melissa Provencher, BRPC
Katy Deng, US EPA Region 1
Caprice Shaw, MassDEP Western Regional Office