



**RE: FY2026 EPA Brownfields Cleanup Grant Application**

The Northeastern Vermont Development Association (NVDA) is pleased to submit this proposal for FY2026 Brownfields Cleanup Grant funding. Below we provide the information requested.

**1. Applicant Identification:**

Northeastern Vermont Development Association (NVDA)  
36 Eastern Avenue, Suite 1  
St. Johnsbury, Vermont 05819

**2. Website URL:** <https://nvda.net/>

**3. Funding Requested:**

- (a) Grant Type: Single Site Cleanup
- (b) Federal Funds Requested: \$3,805,838

**4. Location:**

- (a) City: St. Johnsbury
- (b) County: Caledonia
- (c) State or Reservation: Vermont

**5. Property Information:**

- (a) Property Name: True Temper Factory
- (b) Property Address: 575 Concord Avenue, St. Johnsbury, Vermont, 05819
- (c) Figure (Optional): A figure depicting the site location is attached at the end of this letter.

**6. Contacts:**

- (a) Project Director:  
Name: David Snedeker, Executive Director  
Phone: (802) 748-8303 | Email: dsnedeker@nvda.net  
Mailing Address: 36 Eastern Avenue, Suite 1, St. Johnsbury VT 05819
- (b) Chief Executive/Highest Ranking Elected Official:  
Name: David Snedeker, Executive Director  
Phone: (802) 748-8303 | Email: dsnedeker@nvda.net  
Mailing Address: 36 Eastern Avenue, Suite 1, St. Johnsbury VT 05819

**7. Population:** NVDA is a regional organization that represents 55 small towns and villages in the Counties of Caledonia, Essex, and Orleans. The True Temper Factory property is located in the Town of St. Johnsbury. The Town of St. Johnsbury has a population of 7,364.

**8. Other Factors:**

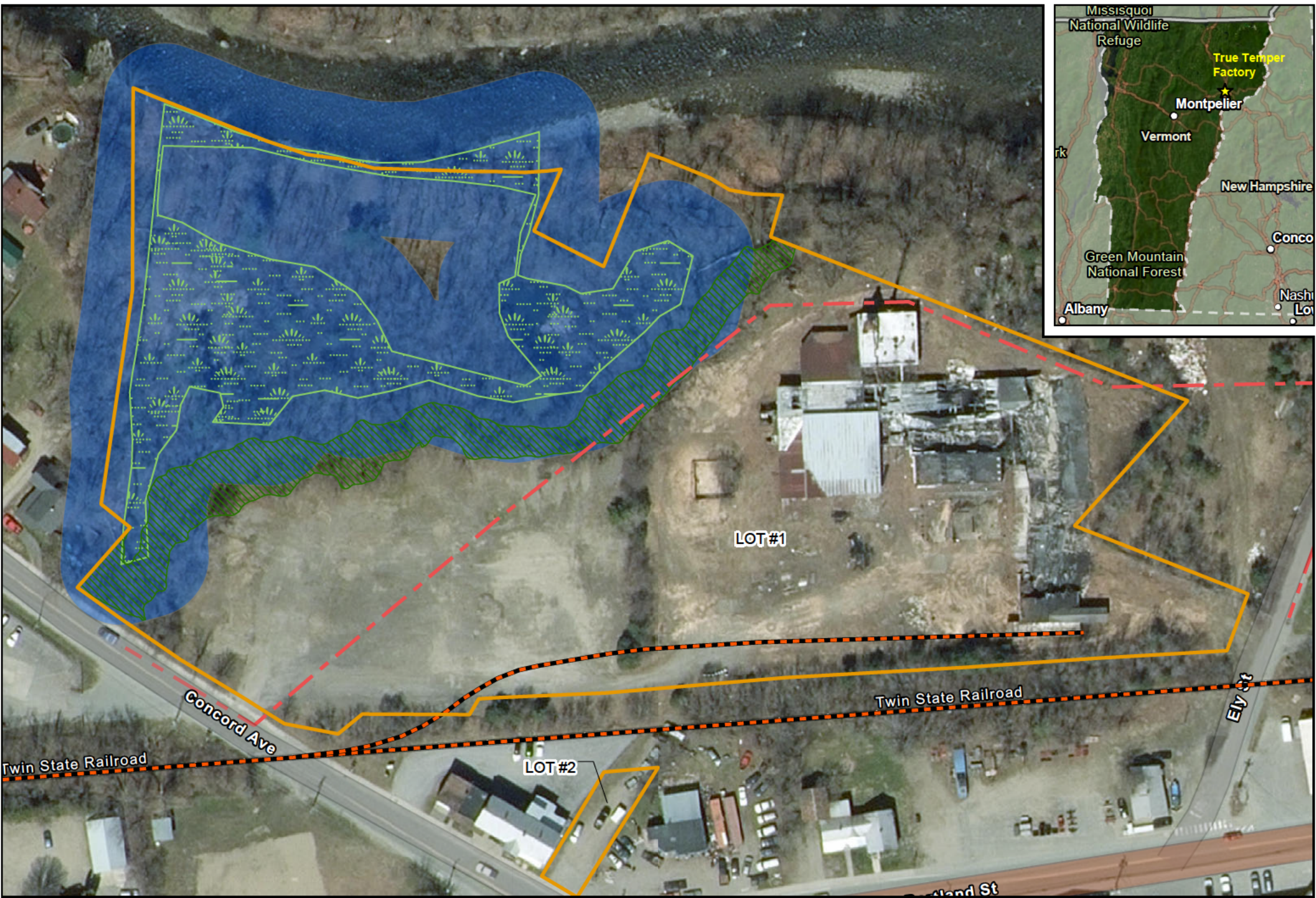
| <b>Other Factors Criteria</b>  | <b>Page #</b> |
|--|---------------|
| Community population is 15,000 or less.  | 1 & 4         |
| The applicant is, or will assist, a federally recognized Indian tribe or United States Territory.  | NA            |
| The proposed brownfield site(s) is impacted by mine-scarred land.  | NA            |
| 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 to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them). | 1**           |
| The proposed site(s) is in a federally designated flood plain.   | NA            |
| The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.   | NA            |
| The reuse of the proposed cleanup 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.   | 2-3           |
| The target area(s) is impacted by a coal-fired power plant has recently closed (2015 or later) or is closing.  | NA            |

NA = Not applicable

\*The development agreement (Attachment I) requires the developer to fund the housing development in full once remediation is complete and the property can be transferred by NVDA to the developer.

\*\*The site borders the Moose River.

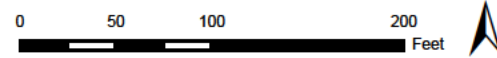
**9. Releasing Copies of Applications:** The table in Section 2.b of the narrative contains contact information for our project partners. Names, phone numbers and email addresses should be redacted prior to release of this grant application. The development agreement included in Appendix I should also be redacted prior to release of the grant application.



**Legend**

- Site Boundary
- Former On-Site Rail Spur & Adjacent Railroad
- Sewer Line
- Wetland Delineation
- Wetland Delineation Buffer
- Embankment

**Notes:**  
 1. Coordinate System: NAD 1983 State Plane Vermont FIPS 4400 (US Feet)  
 2. Source: State of Vermont GIS / ESRI  
 3. All Locations Considered Approximate



|   |  |   |
|---|--|---|
| CREATION DATE:<br><b>JANUARY 05, 2026</b> | PROJECT NO:<br><b>PROJ-225517</b>                          | <b>SITE PLAN</b><br><b>FORMER TRUE TEMPER</b><br><b>FACTORY</b><br><br>Former True Temper Site<br>575 Concord Street, St. Johnsbury, VT |
|   | DRAWN BY: <b>APPRVD BY:</b><br>RM                      KDI |   |
| CHEK'D BY:<br>KDI                         | REVISION:<br>0   |   |

## **1. PROJECT AREA DESCRIPTION & PLANS FOR REVITALIZATION:**

**1.a. Overview of Brownfield Challenges & Description of Target Area:** The Town of St. Johnsbury, Vermont (pop. 7,364; “the Town”) is a tight-knit community on a picturesque landscape located in an area known as the Northeast Kingdom (NEK). The NEK comprises 55 small towns and villages within three counties (Caledonia, Essex, and Orleans) served by the Northeastern Vermont Development Association (NVDA; the applicant) in the northeast corner of Vermont. The NEK is a phrase coined to represent the area’s beauty and way of life. It is known for its quaint small towns, farms, mountains, state forests, lakes, rivers, and some of the best recreational amenities in the State of Vermont. The NEK is one of five Rural Economic Area Partnership (REAP) Zones in the country due to its rural isolation and lack of local capital.<sup>a</sup>

St. Johnsbury, the largest Town in the NEK and geographic area for this project, was settled in 1786 and designated the Caledonia County seat in 1856. The Town became a rail and highway junction as well as the industrial, commercial, and cultural crossroads of the NEK because of its proximity to the Passumpsic, Moose, and Sleepers Rivers, as well as its proximity to Canada. However, the area has lost its economic foundation coupled with continued population decline. Since 2015, Caledonia County has seen significant population loss (-4.0%) while the State of Vermont is seeing a population increase. The Town also has one of the highest senior populations (65+ years) in the State. As the population contracts and ages, businesses no longer have a sufficient base to support them, struggle to find employees, and inevitably close. These business closures vacate buildings on commercial and industrial sites, some of which have had continual use for 100-200 years. This has resulted in abandoned or underutilized brownfields from gas stations to large-scale industrial facilities clustered in our town.

The Target Area (TA) within the Town of St. Johnsbury is the **Summerville District** – an area adjacent to the downtown center and situated at the confluence of the Passumpsic River and Moose River. Due to its location along two rivers (which connect downstream to the Connecticut River and Long Island Sound) and the Twin State Railroad running through its center, this area has been a micro-manufacturing hub of resource extraction and processing for over 200 years. By the 1940s, the TA contained the largest scale producer, largest maple candy manufacturer, and largest candlepin manufacturer in the world. Nearly all these companies are gone, along with the many employees and businesses they supported. Today the TA has one of the lowest annual incomes in Vermont, which coupled with a decline in population (31% since 1950) and disinvestment, creates significant financial hurdles for the Town. Further compounding environmental challenges are four catastrophic floods that occurred in July 2023, December 2023, and twice in July 2024. St. Johnsbury was hit with devastating flash floods during each of these events. The floods caused extensive damage to roads, bridges, and railroads and knocked buildings off their foundations. Just as the area was recovering from cleanup of the 2023 floods, it was hit even harder in July 2024 with more torrential rains and violent floods. These storms flooded commercial and industrial sites carrying contaminated debris through neighborhoods, creating massive sinkholes, and leaving behind an apocalyptic scene after the floodwaters subsided. The TA was struggling to attract new investment and cope with the multitude of brownfield sites prior to the flooding which further compounded these issues. This Cleanup Grant will remediate the largest brownfield site in the TA, support a critical housing project outside of the floodplain, and spur revitalization of surrounding brownfield sites.

**1.b. Description of the Proposed Brownfield Site:** Located along *Moose River*, the **True Temper Factory (“the Site”)**, located at 575 Concord Avenue in St. Johnsbury (“the Site”) is a former wood dowel/tool handle manufacturing facility that operated continuously from the late 1880s through its closure in 1989. A portion of the Site was also used as a lumber yard (“Summerville Wood Yard”) to store the materials needed for manufacturing tool handles by the American Fork and Hoe Company (the original manufacturing operation). For the majority of time manufacturing operations were active, there were not any environmental regulations or standards for proper handling and disposal of chemicals. Health concerns linked to these operations were widely unknown or not a concern. Between 1900 and 1905, five commercial buildings were added to the site for use as a handle storehouse and a handle shop. Additionally, a railroad that operated from 1900-1980 runs through a portion of the property. From 1912 to 1927, several additional buildings were added for handle storage as well as an office building, a wood sawing building, and a coal shed. From 1943 until at least 1964, additional buildings were developed to expand manufacturing. The manufacturing operation was acquired by True Temper, Inc. by the mid-1950s and continued manufacturing wood dowels until ~1989. After the site was sold to a local resident in the 1990s, the site remained vacant but illegal dumping of miscellaneous wastes (including over 100 drums of various hazardous substances) by unknown sources took place from the 1990s through early 2000s. During that time, the owner had relocated out of St. Johnsbury due to declining health and was no longer able to maintain/secure the property. During site assessment activities completed by NVDA in 2022, over 70 drums were discovered stored in the various buildings onsite. To avoid a potential release to the environment, these drums were characterized and the contents properly disposed of by the previous owner. While sitting vacant for over 30 years, the structures have fallen into disrepair, including the main 29,000-square-foot factory building that has completely collapsed.

To prepare for this Cleanup Grant application, a robust Phase II Environmental Site Assessment (ESA) was completed in 2024 followed by a robust Supplemental Phase II ESA in 2025. A brief summary of the findings is provided below:

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<sup>a</sup> Note: The REAP Initiative was established by the USDA to address critical issues related to constraints in economic activity and growth, low density settlement patterns, stagnant or declining employment, and isolation that has led to disconnection from markets, suppliers and centers of information and finance. [\(Source\)](#)

- A wide variety of fill is present onsite, including ash, cinders, metal, brick, concrete blocks, rebar, wood, and glassware. The anthropogenic fill was found to extend from ground surface to depths ranging up to 30 feet (ft) below ground surface (bgs), with the majority of fill observed from 7-18 ft bgs. Many other locations contained re-worked native soil consisting of silt, gravel, and cobbles. The embankment located along the perimeter of the wetland was observed to contain debris, exposed ash, and solid waste from unknown sources that had been attempted to be buried.
- Semi-Volatile Organic Compounds (SVOCs), Polychlorinated Biphenyls (PCBs), metals, and vanadium, were detected in soil in exceedance of urban background and resident Vermont Soil Standards (VSS).
- Volatile organic compounds (VOCs) and total metals were detected in groundwater in exceedance of Vermont Groundwater Enforcement Standards (VGES).
- Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) was detected at concentrations in exceedance of VGES at one location. Six additional monitoring well locations were sampled for PFAS. Five of these locations exhibited detections of the five PFAS compounds included in the VGES; however, the detections are below the current PFAS VGES value.
- Regulated Building Materials (RBMs) including PCBs, asbestos, and lead-based paint were detected in the on-Site buildings. Lead in exceedance of hazardous levels were detected in a portion of the footprint of the 29,000 sq-ft building. The building was condemned in September 2024 with over 70% of the roofing partially or fully collapsed, and a compromised structure, allowing the RBMs and lead to be exposed to potential receptors and atmospheric disbursement.

**1.c. Reuse Strategy & Alignment with Revitalization Plans:** Reuse planning for the True Temper Factory has been underway since 2022 and much has been completed in that time to prepare for redevelopment. In addition to funding two robust Phase II ESAs since 2024, NVDA and the Town of St. Johnsbury have also funded a comprehensive RBM Survey, structural engineering assessment, aquatic resources assessment, wetland delineation and permitting, archaeological resources assessment, vegetation clearing, geophysical survey, topographic and boundary survey, limited demolition, and debris relocation. These activities were completed to position the site for expedited remedial action upon award of a Cleanup Grant. Furthermore, a development agreement (provided in **Attachment I**) was executed between NVDA, the Town of St. Johnsbury, and Kingdom Bent, LLC - a regional developer that specializes in resilient housing design and materials. Kingdom Bent specializes in using "mass timber" for its developments - a family of engineered wood products that combines smaller pieces of wood into stronger, structural components, allowing for a more efficient building process. This product is referred to as "softwood cross-laminated timber panels" and uses a unique technology for development of resilient building materials through alternative use of a fast-growing crop. We believe this project will position NVDA and the Town of St. Johnsbury at the forefront in solving a complicated housing problem throughout the NEK. Furthermore, NVDA and the Town of St. Johnsbury have been working with Kingdom Bent for the past several years on a housing feasibility study and site development plans. This process has included multiple public presentations to solicit community feedback on the various site concepts proposed. Reuse plans include greenspace preservation around the large wetland area and multifamily housing on the developable areas of the property which are divided into two zones. Zone 1 includes three units of row housing which include four housing units per structure (providing a total of 12 housing units). Zone 2 includes four units of rowhousing (providing a total of 16 housing units) plus three duplexes (providing a total of 6 housing units). The project will provide 34 total units of quality housing outside the floodplain.

Cleanup and redevelopment of the True Temper Factory site for quality, affordable housing fits integrally within the revitalization plans for the Summerville District TA and greater area. Unlike other areas of the country, every new service, new job, and new house matters and is a point of pride for our micro-community. Priority site reuses directly support adopted master plan directives laid out in the **2025 St. Johnsbury Town Plan**, **2017 St. Johnsbury Housing Study and Needs Analysis**, and **2019 Opportunity Zone (OZ) Prospectus**. A key theme of all these documents includes addressing the Town's housing crisis (quality, affordable housing outside of floodplain); reducing blight; maintaining and protecting existing assets to grow the local economy through business, tourism, and creative endeavors; and greenspace preservation. At the same time, it is recognized that supporting this endeavor requires providing quality public services and housing to both attract and maintain long-time residents and new residents. NVDA's efforts, through the **2026 Regional Plan for the Northeast Kingdom**, lays out strategies for future land use and development goals, with a focus on a variety of housing types available at different price options to support long-term sustainability. *Additionally, the Town secured Neighborhood Designated Area (NDA) status for the Summerville District to streamline the permitting process for housing developments in this area.*

**1.d. Outcomes & Benefits of Reuse Strategy:** The Town's revitalization plans are focused on vacant and underutilized sites that will provide the most significant near-term benefits for our rural micro-community. Redevelopment of the True Temper Factory is anticipated to provide the following benefits:

- **Provide quality multifamily housing:** The project will provide 34 units of multifamily housing (rowhousing & duplexes) and will have a significant impact on addressing our housing shortage, reduce cost burdening, and building safe housing outside of floodplains. The project not only aligns with local planning priorities but also broader regional/state housing needs.
- **Resiliency Planning & Greenspace Preservation:** Over 50 properties in St. Johnsbury reported substantial damage from the historic flood events in 2023 and 2024 (described in Section 1.a). As the frequency and intensity of storms increases, it is critical to rebuild in areas outside of floodplains and preserve greenspace areas which provide critical buffers during times

of heavy rains and when the water levels rise in our rivers. The True Temper Factory is the largest brownfield site outside of St. Johnsbury's flood zone that provides the greatest redevelopment opportunity for housing. The selected reuse plan includes redevelopment of the previously developed areas of the site and preservation of the large greenspace/wetland area of the site. This approach helps preserve the natural environment and supports flood mitigation efforts.

- **Increase Tax-Based Revenues:** As a small community with limited municipal revenue, every opportunity to increase tax-based revenues makes a difference. Revenues generated by property taxes have declined due to flood-ravaged and condemned buildings caused by catastrophic flooding in 2023 and 2024. Returning vacant and underutilized sites to productive uses will help restore much needed property tax revenue.
- **Stimulate Private Investment:** As evidenced by the development agreement between NVDA, the Town, and Kingdom Bent (provided in **Attachment I**), the proposed revitalization strategy leverages public funding with private investment. Private investment committed by Kingdom Bent for this site is ~\$12M and the development agreement requires them to fund the housing development in full. Remediation of the True Temper Factory will remove barriers to redevelopment and spur new private investment in the surrounding area, which will provide additional community amenities and tax revenues.
- **Utilize Energy Efficient Technologies:** The proposed housing development includes high-efficiency heating systems and double pane windows. Other energy efficient measures under consideration include solar and biomass.
- **Immediate Construction:** The developer is ready to begin construction immediately after cleanup. Initial site designs are complete and extensive development planning has been done by NVDA, the Town, and Kingdom Bent to position the project to move forward quickly after cleanup is complete. Having a clear reuse vision and a developer committed to this project means it will not take years before construction is initiated. Our goal is for cleanup to be complete in 2027 and construction of Zone 1 to be complete in 2028 followed by Zone 2 in 2029 (see Section 1.c for a description of the zones).

**1.e. Resources Needed for Site Characterization:** The True Temper Factory has undergone extensive characterization, with two robust Phase II ESAs completed in 2024 and 2025. These activities also included comprehensive RBM Survey as well as a structural engineering assessment of the remaining buildings, aquatic resources assessment, wetland delineation and permitting, archaeological resources assessment, geophysical survey, topographic and boundary survey, limited demolition, and debris relocation. Site characterization activities are complete (as confirmed by VTDEC in their letter provided in **Attachment B**). Should something warrant further investigation, NVDA has an EPA Brownfield Assessment Coalition Grant that could fund additional site investigation activities.

**1.f. Resources Needed for Site Remediation:** An opinion of probable cost for cleanup was prepared in support of this grant application and is included in the Analysis of Brownfield Cleanup Alternatives (ABCA) provided in **Attachment E**. **The amount of funding requested under this grant application will cover the full cost of remediation for the True Temper Factory.** However, if unforeseen issues arise and additional funds are needed, NVDA will pursue a Brownfield Revitalization Fund (BRF) Grant and/or Brownfield Revolving Loan Fund (RLF) loan from the Vermont Agency of Commerce and Community Development (ACCD). If needed, NVDA could also loan itself money from its EPA Brownfield RLF Grant.

**1.g. Resources Needed for Site Reuse:** As described in Section 1.c, NVDA and its project partner, the Town of St. Johnsbury, have executed a development agreement Kingdom Bent (a local developer) for redevelopment of the site as quality, affordable housing. Upon completion of remediation activities, the developer will acquire the property from NVDA. A copy of the development agreement is provided as **Attachment I**. Although the development agreement requires the developer to fund the housing development in full (which is estimated to be \$12M), should additional funding sources be pursued, NVDA and the Town have experience with leveraging funding from a variety of public and private sources. If needed, NVDA and/or the Town will tap into the following sources to advance reuse of the Site:

- As described in Section 1.a, the Town is located in one of five USDA REAP Zones in the US due to its rural isolation and lack of local capital. Priority consideration of **USDA Rural Development Grants and other federal programs** is given to REAP Zone applications. These funds can be used to further redevelopment of sites.
- **VT Agency of Commerce & Community Development (ACCD)** offers tax credits for redevelopment of brownfield sites.
- **VT Community Development Block Grant (CDBG) Fund** provides federal funding for eligible activities through Implementation Grants (\$50K-\$1M), Planning Grants (\$3K-\$60K), and Scattered Site Grants (\$50K-\$1M) that assist with brownfield redevelopment by funding rehabilitation of existing structures and/or construction of new infrastructure.
- NVDA has an ongoing partnership with the **St. Johnsbury Development Fund** and the **NEK Development Corporation (NEKDC)**. These partnerships provide opportunities to leverage additional funding from private and public sources, including RLFs and redevelopment capital.
- **Tax credits designed to assist with rehabilitation and capital improvements** are available for older and historic buildings located within designated downtowns, village centers, and Neighborhood Designated Areas (such as the **Summerville District TA where the True Temper Factory is located**).

**1.h. Use of Existing Infrastructure:** The Summerville District TA is one of the earliest developed areas of the Town of St. Johnsbury. Therefore, the Site has robust existing infrastructure from roads, water, sewer, power, gas, and telecommunications as well as access to highway, rail, and public transit. When demolition and debris removal is necessary

(as is the case with the collapsed True Temper buildings), NVDA will use architectural salvage strategies to minimize materials sent to landfills. This is a strategy that has been successful for other cleanup projects within the Town of St. Johnsbury.

**2. COMMUNITY NEED & COMMUNITY ENGAGEMENT:**

**2.a. The Community’s Need for Funding:** As a community with a small population, financial resources are extremely limited, and we are unable to draw on other adequate sources of funding to address environmental contamination without an EPA Grant. As described in Section 1.a, the NEK is one of five REAP Zones in the country, identified because of its rural isolation and lack of local capital. With a small population, tax revenues used to fund local government and cleanup projects are very limited. This is further exacerbated by an aging population, declining incomes, and lower than average workforce participation compared to the State and US. Demographic data provided below demonstrate lower than average tax revenues due to high poverty/high low-income population, below average median household income, and above average unemployment (population not in the labor force). Together these factors indicate much lower than average discretionary income, which results in less spending, decreasing business revenues and taxes.

| Table 2.1: Demographic Information <sup>b</sup> | Summerville District<br>(CT #50005957500) | Town of<br>St. Johnsbury | Caledonia<br>County | State of<br>Vermont | United States |
|---|---|--------------------------|---------------------|---------------------|---------------|
| Population                                      | 3,724                                     | 7,364                    | 30,425              | 645,254             | 332.4M        |
| Senior Population (age 65+ years)               | 21.7%                                     | 22.1%                    | 22.5%               | 20.8%               | 16.8%         |
| Disabled Persons Population                     | 19.2%                                     | 19.1%                    | 17.7%               | 14.5%               | 13.0%         |
| Population not in Labor Force (age 16+ years)   | 41.1%                                     | 38.1%                    | 37.1%               | 35.3%               | 36.5%         |
| Median Household Income                         | \$57,336                                  | \$49,033                 | \$66,075            | \$78,024            | \$78,538      |
| Poverty Rate                                    | 18.3%                                     | 20.4%                    | 12.6%               | 10.3%               | 12.4%         |
| Children/Youth Poverty Rate (<18 years)         | 24.7%                                     | 29.0%                    | 16.0%               | 10.8%               | 16.3%         |
| Households Receiving Social Security Income     | 5.9%                                      | 7.0%                     | 6.8%                | 5.3%                | 5.1%          |
| Median Home Value                               | \$165,200                                 | \$171,900                | \$215,900           | \$290,500           | \$303,400     |
| Housing built before 1980s                      | 84.1%                                     | 89.0%                    | 61.6%               | 57.6%               | 51.3%         |
| Vacant Housing Units                            | 4.0%                                      | 8.7%                     | 19.9%               | 20.1%               | 10.4%         |

**Bold** indicates distress factors above or below (depending on factor) US averages. **Shaded** indicates distress factors above or below State averages.

The income and tax revenue characteristics described above demonstrate the inability to allocate funding to brownfields in a meaningful way without an EPA Grant. Over the last few years, tax revenues have increased very little and regional priorities continue to be funding essential public safety functions such as fire, police, and emergency response to natural disasters. The community’s need for funding was further demonstrated by the significant demand for NVDA’s past EPA Brownfield Assessment Grants which greatly exceeded the funds available for assessment and cleanup planning activities. Brownfield Cleanup Grant funding is vital to moving remedial activities forward and helping the NVDA continue the momentum of its Brownfields Revitalization Program.

**2.b. Health or Welfare of Sensitive Populations:** As demonstrated in Table 2.1, St. Johnsbury is among the most impoverished areas of VT. Levels of distress are further compounded within the TA (where 50% of St. Johnsbury’s resident live), resulting in significant welfare impacts to sensitive groups which include low-income residents of all ages but most notably seniors and children.

- **Aging Population:** Vermont has one of the oldest populations in the US, and the TA has some of the highest concentrations of seniors in the State. According to the latest Census, 22% of the TA population is aged 65+. By 2030 this age group is estimated to account for >35% of the population. Residents in the 55+ age bracket are increasing, while those in the 35-54 age bracket are decreasing, reflecting an erosion of the highest earning age bracket and a growing population of those in retirement. As the population dwindles, local business that rely on residents lack a customer base and are forced to close leaving fewer options and services for those remaining.
- **Low Income Population:** As businesses and industries closed due to competition from overseas as well as flood disasters forcing small businesses to fold, those who stay and are under 65 see their good paying job prospects decline. It isn’t feasible for our low-income residents to just commute for another job or for basic goods and services. As shown in Table 2.1, 25% of residents <18 years of age are living in poverty and the TA has a median income \$21K below the state average.
- **Housing:** Addressing the aging housing stock by providing affordable quality housing solutions outside of the floodplain is the primary focus for this project. As shown in Table 2.1, 84% of the homes within the TA were built prior to 1980 and the median home value is <\$50K less than the state average. Additionally, only 4% of houses in the TA are vacant whereas the state average for housing vacancies is 20% (5x higher than the TA!). The lack of vacant housing units demonstrates the critical need for more housing in the TA. Furthermore, low incomes and increasing age of the TA population inhibit the ability to maintain or upgrade a property, thus lowering market values and perpetuating blight. Many homes in the TA were built prior to 1940. These homes are often not equipped to meet the needs of the aging population, high percent of people with disabilities (nearly 1 in 5 for the TA), and the workforce the region seeks to attract. Deferred maintenance and unkempt housing are contributing to negative perceptions of the area. Newer construction most often occurs outside of

<sup>b</sup> Unless noted otherwise, all data reflects 2019-2023 American Community Survey, 5-yr data (obtained from www.factfinder.census.gov).

town, leaving behind unkempt and decaying town centers. This blight acts as a barrier to investment in the community, often steering employers to locate elsewhere. Through the use of this grant, we intend to start a new chapter with quality affordable housing in the TA to meet the needs of the current population and attract new residents to our community.

EPA Cleanup Grant funding will be used to move forward with redevelopment of the True Temper Factory as a multifamily housing project that will provide 34 units of quality housing outside the floodplains. The proximity of the site to St. Johnsbury’s Hospital District will improve medical access for the elderly and providing quality workforce housing for the area’s largest employer (the Northeastern Vermont Regional Hospital).

**2.c. Greater Than Normal Incidence of Disease & Adverse Health Conditions:** Health data is not available at the CT or Town level, so the next closest geographic area, Caledonia County, is being used. Of the 14 counties in VT, Caledonia ranks the 12th in the state, indicating a greater than normal incidence of disease.<sup>c</sup> According to the VT Dept. of Health (DOH) data, lung, colorectal, and cervical cancer rates for Caledonia County were higher than statewide rates. More acutely impacting health impacts, like cancers, could be attributed to largely unregulated use and/or disposal of VOCs, SVOCs, metals, PCBs, and PFAS (all of which have been confirmed at concentrations exceeding cleanup levels at the *True Temper Factory*). This is where our older population spent their working lives and had significant environmental exposure. Cleanup of the True Temper Factory will aid in mitigating the cumulative exposure of TA residents to contamination associated with brownfields and other sources of contamination contributing to these high rates of disease.

Further, asthma prevalence in Vermont has been higher than the nationwide rate since 2007 and Vermont recently ranked among states with the highest rates of asthma in the US.<sup>f</sup> The counties in the NEK have the highest rate of asthma prevalence in the State when compared to other counties, and **St. Johnsbury has the highest asthma rate of any municipality in Vermont.** A persistently damp environment caused by frequent flooding creates a breeding ground for mold. Mold issues as well as housing stock that is old, poorly ventilated, and likely to have LBP, ACM, and PCBs, are factors that contribute to poor indoor air quality. When mold grows indoors, it can release spores which can trigger respiratory issues. This humid environment becomes conducive for dust mite populations and bacteria growth, which further degrade indoor air quality. The EPA Cleanup Grant will allow us to create new, healthy housing options for our residents which will reduce potential for asthma and other respiratory illnesses resulting from ingestion/inhalation of fine particulates.

**Table 2.2: Indicators of Distress for Summerville District**

| Data Type                           | Percentile in VT |
|-------------------------------------|------------------|
| Air Toxics Cancer Risk              | <b>91%</b>       |
| Air Toxics Respiratory Hazard Index | 86%              |
| Lead Paint Indicator                | 87%              |
| Superfund Proximity                 | <b>92%</b>       |
| Hazardous Waste Proximity           | 87%              |
| Underground Storage Tank Proximity  | 89%              |
| Low Income Population               | <b>94%</b>       |
| Demographic Index                   | <b>90%</b>       |

*Red indicates distress factor >90th percentile.*

**2.d. Economically Impoverished/Disproportionately Impacted Populations:** As discussed in Sections 1.a-1.b, the TA was once a small manufacturing hub and is now home to 63% of the residents of St. Johnsbury (see Table 2.1). Now that many of the former manufacturing businesses in the TA are gone, blighted properties awaiting cleanup are scattered throughout the area in close proximity to residences. Residents in the Summerville District TA are essentially trapped by their economic circumstances, living next door to boarded up buildings and contaminated sites. A report generated using geospatial mapping tools (see Table 2.2) demonstrate that the large low-income population in the TA are disproportionately impacted by exposure to hazardous substances, with a large majority living in close proximity to contaminated sites. The *True Temper Factory* provides the largest infill development opportunity for housing in St. Johnsbury. Not only does this project provide the opportunity to cleanup a site with significant contamination, but the project will also provide affordable, healthy homes outside of floodplains – something that is critical to protecting the health and welfare of this underserved community.

**2.e. Project Involvement / 2.f. Project Roles:** NVDA has an active Brownfields Advisory Committee (BAC) that meets on the second Tuesday of each month where we review site nominations for our EPA Brownfield Assessment and RLF Grants, discuss redevelopment projects and progress on sites funded by our grants, and funding strategies for moving sites forward through cleanup and redevelopment. NVDA intends to continue expanding its BAC by inviting additional community partners to help guide grant implementation and bring new voices to the table. These partners will provide input on the site selection and reuse planning process. Below is a summary of current and anticipated project partners and their roles.

| Organization Name              | Point of Contact | Organization Purpose & Project Role   |
|--------------------------------|------------------|---|
| Town of St. Johnsbury*         | [REDACTED]       | <b>Mission:</b> Local government. Project partner.<br><b>Role:</b> Advise on site reuse options and support economic development.                 |
| Summerville Neighborhood Group | [REDACTED]       | <b>Mission:</b> Represent interests of Summerville District.<br><b>Role:</b> Inform cleanup and reuse planning.                                   |
| Kingdom Bent, LLC              | [REDACTED]       | <b>Mission:</b> Housing developer specializing in mass timber production.<br><b>Role:</b> Housing developer (agreement provided in Attachment I.) |

<sup>c</sup> County Health Rankings & Roadmaps. 2025 County Health Rankings, Vermont. [\(Link\)](#)

| Organization Name                           | Point of Contact | Organization Purpose & Project Role   |
|---|------------------|---|
| Northern Forest Center*                     | [REDACTED]       | <b>Mission:</b> Natural resource preservation, recreational tourism & sustainable workforce housing developments.<br><b>Role:</b> Inform reuse planning for housing-focused projects.                           |
| Northeastern VT Regional Hospital (NVRH)*   | [REDACTED]       | <b>Mission:</b> Regional hospital and healthcare provider.<br><b>Role:</b> Outreach, evaluating health issues & planning around cleanup decisions. Connect developers to workforce and senior housing projects. |
| St. Johnsbury Development Fund*             | [REDACTED]       | <b>Mission:</b> Economic Development in Northern VT.<br><b>Role:</b> Identifying/leveraging funds for redevelopment activities.   |
| Vermont Dept. of Historic Preservation      | [REDACTED]       | <b>Mission:</b> Preserving Vermont's historic resources.<br><b>Role:</b> Input on cleanup decisions and relation to preservation.   |
| NEK Development Corporation                 | [REDACTED]       | <b>Mission:</b> Regional economic development corporation.<br><b>Role:</b> Attract and retain business, address regional economic challenges.   |
| NEK Collaborative                           | [REDACTED]       | <b>Mission:</b> Improve quality of life via economic & community development.<br><b>Role:</b> Address economic challenges. Inform site reuse.   |
| NEK Community Action                        | [REDACTED]       | <b>Mission:</b> Provide social services that address poverty through education, community collaborations and community action.<br><b>Role:</b> Outreach to sensitive populations. Inform site reuse.            |
| NEK Division of Developmental Services      | [REDACTED]       | <b>Mission:</b> Help individuals with disabilities lead normal and complete lives.<br><b>Role:</b> Advisory role with outreach to sensitive residents.  |
| VT Agency of Commerce & Community Develop.* | [REDACTED]       | <b>Mission:</b> Enhance business, promote tourism & strengthen communities.<br><b>Role:</b> Municipal grants, planning and community development.   |
| Vermont Dept. of Health (DOH)               | [REDACTED]       | <b>Mission:</b> Protect health, disease prevention.<br><b>Role:</b> Outreach, evaluating health issues & planning.  |
| VTDEC*                                      | [REDACTED]       | <b>Mission:</b> Protection of Human Health and the Environment.<br><b>Role:</b> Project oversight, potential funding support.   |
| Passumpsic Savings Bank*                    | [REDACTED]       | <b>Mission:</b> Local financial institution.<br><b>Role:</b> Connect developers with private lending options.   |

\*Current BAC member.

**2.g. Incorporating Community Input:** NVDA has worked with project partners and community stakeholders to form strong partnerships for all our grant projects. At the beginning of the project, NVDA will develop a Community Involvement Plan (CIP) that provides background information about the project, a timeline of key activities (including public meetings), and information about how to stay informed and provide feedback on cleanup and reuse planning. NVDA will collaborate with the Town of St. Johnsbury on community engagement activities and ensure equal access to project information for all residents. In addition to hosting monthly BAC meetings, NVDA is also a regular participant in the Town of St. Johnsbury's bimonthly Selectboard meetings. The Selectboard meetings are open to the public for in-person and/or virtual participation. The agenda and attendance options for these meetings is advertised in advance of each meeting in four locations: the St. Johnsbury Clerk's Office, the Town Library, the Police Station, and the Town's website. NVDA will use outreach methods previously proven successful on projects in St. Johnsbury to collaborate with project partners and community members. Formal bi-annual or project-specific (as part of the public comment period for each cleanup plan) meetings will be held at the St. Johnsbury Clerk's Office where Selectboard meetings are also hosted. Each meeting will be offered in a hybrid format (in-person and virtually) as is the standard for all Town meetings. In addition to advertising meetings using the Town's traditional methods described above, NVDA will also post meeting notices on VTDEC's Environmental Notice Bulletin (ENB) and in the local newspaper (the *Caledonian Record*). NVDA will also develop a project-specific webpage with background files for the project, reuse plans, and information about how to provide input on cleanup and reuse plans. As a key project partner, the Town of St. Johnsbury will also include a link on their website to NVDA's project webpage.

**3. TASK DESCRIPTIONS, COST ESTIMATES, & MEASURING PROGRESS:**

**3.a. Proposed Cleanup Plan:** The cleanup plan for the True Temper Factory consists of debris removal, controlled demolition of buildings with offsite disposal of asbestos and hazardous waste, embankment surface remediation, limited impacted soils excavation and off-site disposal, and installation of surface caps along with institutional and engineering controls. Controlled demolition must be performed by an appropriately licensed abatement contractor with a written notification to VTDOH of planned removal activities at least 10 working days prior to the commencement of asbestos removal/abatement activities. This work includes installation of erosion and sediment controls (i.e., structural barriers, silt socks, silt fence, etc.), utility terminations, removal of universal wastes, and orphan drum removal. Prior to demolition, dewatering is anticipated in the basement of existing structures to remove standing water, followed by treatment via bag filter with granular activated carbon and discharge to sewer. Additional dewatering may be required during demolition and impacted soils remediation to keep excavations dry. Controlled demolition will be performed using wet methods to control friable asbestos-containing fugitive dust emissions. Waste resulting from controlled demolition will be transported and disposed as Bulk Load asbestos-containing materials (ACM) except for building materials exhibiting a lead Toxicity Characteristic Leaching Procedure (TCLP) > 5.0 mg/L which must be handled and disposed as hazardous lead impacted waste. Lead abatement includes excavation, loading, transportation, and disposal of lead-impacted construction and demolition (C&D) debris from the compromised

east building. Based on the sampling results, it is estimated that the southern half of the compromised east building will be disposed as hazardous waste, totaling approximately 250 tons. All hazardous waste will be transported and disposed at Waste Management Resource Conservation and Recovery Act (RCRA)/Toxic Substances Control Act (TSCA) facility in Emelle, Alabama. Upon completion of demolition, all structures will be backfilled with clean structural fill and graded, followed by topsoil and hydroseed. Imported soil fill shall be analyzed for applicable VTDEC criteria for unrestricted use.

In order to perform intrusive work within the wetland buffer areas including the Site embankment, a Vermont Wetland Individual Permit must be obtained from VTDEC (a Wetland General Permit has already been obtained). Surface remediation of the embankment includes first clearing of all trees and brush necessary to access exposed surface debris. The embankment is approximately 600 feet in length extending approximately 30 feet from the southern leading edge. Exposed debris will be removed to 1-foot bgs, assumed to be non-hazardous, and will be disposed at Casella’s Landfill in Coventry, Vermont. An estimated 800 tons of debris are anticipated for excavation, transportation, and disposal. Restoration of the embankment includes utilizing existing soils to cover exposed ash and uniformly slope the embankment followed by the placement of four inches of topsoil. The slope will then be stabilized using jute-mat and hydroseed.

Limited excavation and off-Site disposal of impacted soils will be completed in three (3) phases. The first phase includes removal of ACM impacted surface soils 25 feet around the perimeter of building footprints to a depth of 0.5 ft bgs. ACM impacted soils will be transported to Casella’s Coventry Landfill for disposal. The second and third phases are included as a contingency to manage impacted soil “hot spots” that cannot be managed in place. The second phase of soil remediation includes the removal of existing soil to access underlying grossly contaminated soils. These soils are assumed to meet resident VSS and will be staged for later use as backfill. The third phase also includes a contingency (two-150 cubic yard areas) for any grossly contaminated areas that may be identified during removal of soils which cannot be managed on-Site, if any.

This remedial approach consists of placing a surface soil cap throughout the re-developable high ground area to minimize exposure and direct contact, while leaving the existing waste and soil contamination in place (i.e., engineering controls). The cleanup plan also includes institutional controls to restrict Site use and Site groundwater use. Clean soil fill will be imported to construct the surface soil cap over the Site, excluding currently developed areas (i.e., building footprints), with 14-inches of clean soil placed and compacted, followed by 4-inches of clean imported topsoil and hydroseed.

Construction duration is estimated to be 85 working days. Institutional and engineering controls will be implemented following completed of construction activities. Institutional controls for the Site include a deed restriction to restrict Site groundwater use and to prevent modification of engineering controls. Engineering controls at the Site will include a surface soil cap to prevent exposure to underlying impacted soils, and the installation of Sub-Slab Depressurization System (SSDS) in all new structures to mitigate potential VOC impacts. Both the cap/cover system and SSDS require annual inspections and reporting to be completed as part of this alternative. Additional reporting includes a Site Management Plan (SMP), VTDEC Correction Action Completion Report, and EPA Final Performance Report.

**3.b. Project Implementation / 3.c. Anticipated Project Schedule / 3.d. Task/Activity Lead / 3.e. Outputs:** The scope of work has been organized into the tasks below. We believe the project will be completed in two years.

|  |
|--|
| <b>Task 1: Project Management, Reporting &amp; Other Eligible Activities</b>   |
| <b>3.b. Project Implementation:</b> Task 1 will include: 1) general Cooperative Agreement (CA) compliance oversight; 2) quarterly progress reporting; 3) annual Federal Financial Report (FFR); 4) Property Profile Form submission and updates in EPA’s Assessment, Cleanup and Redevelopment Exchange System (ACRES) database; 5) a final performance report summarizing accomplishments, expenditures, outcomes, outputs, lessons learned and resources leveraged; 6) biweekly check-in meetings with the consultant to ensure the project is progressing as planned; and 7) participation in national and regional brownfield conferences. |
| <b>3.c. Project Schedule:</b> Activities will be ongoing throughout the project period.  |
| <b>3.d. Task Lead:</b> NVDA with support from the Qualified Environmental Professional (QEP) Contractor.   |
| <b>3.e. Output(s):</b> 8 Quarterly Reports; 2 Annual FFR; prompt ACRES reporting; one Final Performance Report and associated financial documents; two brownfield conferences attended by two NVDA staff; and 48 biweekly check-in meetings with QEP Contractor (24 meetings/year x 1 hr/meeting x 2 years); 24 monthly check-in meetings with VTDEC, EPA and QEP Contractor (12 meetings/year x 1hr/meeting x 2 years)  |
| <b>Task 2: Community Engagement</b>  |
| <b>3.b. Project Implementation:</b> A detailed description of the planned methods for involving the public is provided in Section 2.g. This task includes: 1) preparing a CIP; 2) continuing monthly BAC meetings and attending the Town of St. Johnsbury’s Selectboard meetings; 3) organizing and hosting two public meetings/year; 4) preparing fact sheets and press releases; 5) posting regular updates to the project webpage hosted on NVDA’s website; and 6) providing project updates via press releases in the <i>Caledonian Record</i> and/or mailers to residents in the TA.  |
| <b>3.c. Project Schedule:</b> The CIP, project webpage and fact sheets will be completed by the second quarter (2Q) of the project. Two community meetings will be hosted per year with the first during 2Q. BAC meetings will continue to be held monthly and the Town’s Selectboard meetings are held bimonthly.   |
| <b>3.d. Task Lead:</b> NVDA with support from the QEP Contractor and Town of St. Johnsbury.  |

**3.e: Output(s):** CIP. 12 BAC meetings/year, 24 Selectboard meetings/year, two public meetings/year and meeting materials. Two project fact sheets. Project posters. Mailers. Public notices published in the *Caledonian Record*, NVDA website, and Town of St. Johnsbury website. Develop and maintain project webpage on NVDA's website.

**Task 3: Remedial Activities**

**3.b. Project Implementation:** Property cleanup/cleanup planning will include: 1) Endangered Species Act (Section 7) and National Register of Historic Places (Section 106) consultations (full-time cultural resources monitoring is anticipated for some areas of the site); 2) Update existing Master Quality Assurance Project Plan (QAPP) developed for NVDA's Brownfield Assessment Grant Project; 3) finalize the ABCA; 4) Develop a Corrective Action Plan (CAP) and demolition bid/specification package; 5) QEP oversight of remedial activities (including a Davis-Bacon Act [DBA], Build America Buy America [BABA], and EPA compliant (2 CFR § 200.317-326) request for quotation process to secure cleanup and waste transportation contractors); 6) implement the cleanup plan described in 3.a, including all permitting and pre-work submittals, Health and Safety Plan (HASP) preparation, controls to secure the Site, and remove, load, transport, and dispose of hazardous debris and contaminated soil; importing clean backfill and placement of topsoil and grass seed; 7) preparation of a Site Management Plan; and 8) preparation of a Closure Report documenting all aspects of the cleanup project. Coordination with VTDEC under their Brownfields Reuse & Environmental Liability Limitation Act (BRELLA) Program will also be included.

**3.c. Project Schedule:** Items 1-6 described above will be completed in 2026-2027. Items 7-8 will be completed in 2027-2028. Coordinated with VTDEC will be ongoing throughout the life of the project.

**3.d. Task Lead:** QEP Contractor under the direction of NVDA.

**3.e: Output(s):** Section 7 and Section 106 Consultations, Updated QAPP, HASP, Final ABCA, CAP with Cleanup Specifications, Demolition/Bid Specification Package, DBA & BABA Compliance, Site Cleanup, Cultural Resources Monitoring Report, Closure Report, and Site Management Plan.

**3.f. Cost Estimates:** The estimates below use an average rate of \$200/hour for QEP services. NVDA is requesting 5% of the grant for indirect costs (\$181,230) for administrative expenses. Approximately **93% of grant funds (\$3.54M of contractual and construction services) are allocated for environmental cleanup.**

**Task 1: Project Mgmt., Reporting & Other Activities | Total Budget = \$63,000 (\$60,000 Direct + \$3,000 Indirect)**

**Travel Total = \$10,000**

- National Brownfields Conference: \$7,000 (\$3,500/person x 2 NVDA staff x 1 conference)
- Regional Brownfields Conference: \$3,000 (\$1,500/person x 2 NVDA staff x 1 conference)

*(Note: Travel costs include airfare/mileage, lodging, meals, transportation, and incidental expenses.)*

**Other Total = \$1,200** (Conference Registration Fees [\$300/person x 2 NVDA staff x 2 conferences])

**Contractual Total = \$48,800**

- Compliance Reporting (Quarterly & Final Reports, ACRES updates, & FFRs): \$20,000 (100 hours x \$200/hr)
- Biweekly Project Meetings: \$19,200 (24 meetings/yr x 1 hour/meeting x 2 years x 2 staff x \$200/hr)
- Monthly Project Meetings with EPA & VTDEC: \$9,600 (12 meetings/yr x 1 hour/meeting x 2 years x 2 staff x \$200/hr)

**Task 2: Community Engagement | Total Budget = \$25,200 (\$24,000 Direct + \$1,200 Indirect)**

**Contractual Total = \$24,000**

- Develop CIP, Project Fact Sheets & Project Webpage Content: \$8,000 (40 hours x \$200/hr)
- Public Meetings: \$16,000 (80 hours to periodically attend BAC, Selectboard and other stakeholder meetings)

**Task 3: Remedial Activities | Total Budget = \$3,717,638 (\$3,540,608 Direct + \$177,030 Indirect)**

**Contractual Total = \$1,198,524**

- |   |   |
|---|---|
| <ul style="list-style-type: none"> <li>• Section 106 Consultation &amp; Archaeological Monitoring: \$44,000 (220 hours x \$200/hr)*</li> <li>• Section 7 Consultation: \$6,000 (30 hours x \$200/hr)</li> <li>• Compliance with Other Federal Cross Cutters (prevailing wages, etc.): \$20,000 (100 hours x \$200/hr)</li> <li>• Finalize ABCA &amp; Develop Remedial Design Plan: \$26,600 (133 hours x \$200/hr)</li> <li>• Update Master QAPP: \$4,000 (20 hours x \$200/hr)</li> <li>• Corrective Action Plan: \$30,000 (150 hours x \$200/hr)</li> <li>• Health &amp; Safety Plan (HASP): \$3,800 (19 hours x \$200/hr)</li> <li>• Contract Document Preparation &amp; Bidding Support: \$50,000 (250 hours x \$200/hr)</li> <li>• Review of Contractor Demolition Plan &amp; HASP: \$4,000 (20 hours x \$200/hr)</li> </ul> | <ul style="list-style-type: none"> <li>• Field Event Prep/Coordination &amp; Contractor Oversight: \$435,310 (2176.55 hours x 200/hr)</li> <li>• Asbestos Project Monitoring Oversight (6 weeks): \$55,000 (275 hours x \$200/hr)</li> <li>• Community Air Monitoring (4.1 months): \$18,450 (4.1 months x \$4,500/month)</li> <li>• Field Equipment Rentals/Expenses &amp; QEP Mobilization/Travel Expenses: \$79,884**</li> <li>• Institutional &amp; Engineering Controls: \$311,000**</li> <li>• Analytical Fees for Waste Characterization: \$35,000</li> <li>• Data Validation: \$8,000 (40 hours x \$200/hr)</li> <li>• Site Management Plan &amp; Corrective Action Completion Report: \$67,480 (337.4 hrs x \$200/hr)</li> </ul> |
|---|---|

\*Full-time cultural resources monitoring is anticipated during cleanup in some areas of the site.

\*\*A detailed breakdown of these items is provided in the ABCA (Attachment E).

**Construction Total = \$2,338,584\***

- Remedial Design & Preliminary Activities: \$161,157
- Dewatering & Controlled Demolition (with offsite disposal of hazardous waste; assume 30 days): \$1,159,642
- Embankment Surface Remediation (assume 20 days): \$290,085
- Lead Abatement: \$15,000
- Limited Impacted Soils Remediation (assume 15 days): \$421,350
- 18-inch Surface Soil Cap (assume 20 days): \$291,350

\*A detailed breakdown of costs included for construction activities under each of the categories above is provided in the ABCA (Attachment E).

**Other Total = \$3,500**

- Project Mailers & Press Releases: \$3,000
- Cleanup Signage: \$500

A summary of the proposed budget for grant funded activities is provided in the table below.

| Budget Category      | Task 1: Project Mgmt., Reporting & Other Activities | Task 2: Community Engagement | Task 3: Cleanup Planning & Implementation | Total              |
|----------------------|---|------------------------------|---|--------------------|
| Travel               | \$10,000  | \$0                          | \$0                                       | \$10,000           |
| Contractual          | \$48,800  | \$24,000                     | \$1,198,524                               | \$1,271,324        |
| Construction         | \$0   | \$0                          | \$2,338,584                               | \$2,338,584        |
| Other                | \$1,200   | \$0                          | \$3,500                                   | \$4,700            |
| Total Direct Costs   | \$60,000  | \$24,000                     | \$3,540,608                               | \$3,624,608        |
| Total Indirect Costs | \$3,000   | \$1,200                      | \$117,030                                 | \$181,230          |
| <b>TOTAL BUDGET</b>  | <b>\$63,000</b>                                     | <b>\$25,200</b>              | <b>\$3,717,638</b>                        | <b>\$3,805,838</b> |

**3.g. Plan to Measure & Evaluate Environmental Progress & Results:** Upon notice of award, a project schedule will be prepared with key tasks, milestones, and reporting requirements, including the outputs associated with each task detailed in Sections 3.b-3.e. This schedule will be reviewed on a biweekly basis throughout the project to identify any potential deviations so corrective measures can be developed and implemented (if needed). The status and estimated completion dates for the outputs described in Sections 3.b-3.e will be tracked and reported to EPA via Quarterly Performance Reports and ACRES updates. A summary of community feedback and responses provided will be maintained by NVDA as part of the administrative record. The overall project result is cleanup of nearly 8 acres and a shovel-ready site that will be ready for a housing redevelopment. Eventual project outcomes, and the units that will be used to measure them include: (1) Total acres redeveloped; (2) Number of jobs directly and indirectly created; (3) Number of housing units created; (4) Total acres of greenspace preserved; and (5) Amount of funding leveraged. The consultant will document the project’s alignment with controlling documents such as the ABCA and design package. All outputs and outcomes will be reported in ACRES.

**4. PROGRAMMATIC CAPABILITY & PAST PERFORMANCE:**

**4.a. Organizational Structure / 4.b. Description of Key Staff:** NVDA employs 14 staff, including planning, business development, geographic information system (GIS), accounting, and administrative support. As demonstrated on past EPA Grants, NVDA has the capacity to successfully carry out and manage the programmatic, administrative, and financial requirements of federal programs. As the grantee, NVDA will continue to be responsible for management of the Cooperative Agreement and compliance with grant terms and conditions, overseeing the contractor team, reporting to EPA, financial management, stakeholder engagement, coordination with project partners and the BAC, and coordinating site access. NVDA will continue use a two-person management team that will oversee all aspects of the project to ensure timely completion of key milestones. Key staff involved in the past EPA Grant projects will continue to serve on this project and provide the same level of involvement that has resulted in efficient and successful expenditure of grant funds. These staff include:

- **David Snedeker, Executive Director, NVDA**, was appointed as Executive Director in 2013 and serves on numerous advisory committees and boards throughout the NEK and the State. As NVDA’s Planning Manager from 2007 to 2013, David managed activities in Land Use, Transportation, Natural Resource Planning, and Community Development. During his tenure, he has led efforts to secure the federal designation of the Foreign Trade Zone #286 for the NEK - a significant incentive to attract businesses to the region. David has also provided key leadership for the Vermont-Quebec Enterprise Initiative, which facilitates the expansion of Quebec companies across the border to foster economic development in Vermont. As Project Director of NVDA’s past EPA Grants, David oversaw all phases of the project, meeting established metrics, and completing all projects at least one year ahead of schedule.
- **Annie McLean, Community & Economic Recovery Specialist, NVDA**, supports the NEK’s 55 towns through various stages of the municipal planning process. Annie has supported NVDA’s most recent EPA Brownfield Assessment and RLF Grants, assisting with coordination of community outreach and consultant oversight. Annie has attended all Northern Vermont Economic Development District meetings since joining NVDA and completed annual reporting tasks for the region’s Comprehensive Economic Development Strategy (CEDs). She is currently managing a \$1.5M Build 2 Scale Grant awarded by the US Economic Development Administration (ED) for the NEK region.

**4.c. Acquiring Additional Resources:** NVDA routinely contracts for engineering and consulting services and has expertise complying with federal procurement requirements. NVDA does not intend to award any subgrants but does plan to retain a QEP and remediation contractor team to support project management and all technical aspects of the project. NVDA's systems include development of RFQ/Ps in-house with review by legal staff and/or the Region 1 technical assistance provider (as necessary) prior to issuance. The RFQ/P is distributed via direct email and posting RFQ/Ps on VTDEC's Environmental Notice Bulletin (ENB). When a RFQ/P is posted to the ENB, all environmental consultants registered in the State of Vermont receive an email notifying them of the posting. A selection committee comprised of NVDA staff and key project partners (such as the Town of St. Johnsbury) reviews proposals and may conduct interviews depending on the size of the project and the quality and number of proposals received. Proposals are scored, ranked, and contractors selected based on the scoring/selection criteria specified in the RFQ/P. Contracts are then executed with the selected firm subject to further legal review. NVDA will secure a QEP Contractor upon notice of grant award. NVDA will abide by EPA procurement requirements (2 CFR § 200.317-326 and *Best Practice Guide for Procuring Services, Supplies & Equipment*) for procuring a QEP, cleanup contractor and any additional project resources.

**4.d. Currently Has or Previously Received an EPA Brownfields Grant:** NVDA has received seven EPA Brownfield Grants since 2006. Information for our three most recent EPA Grants is provided below.

**(1) Accomplishments:**

**(1.) 2025 Assessment Coalition Grant (\$1.2M):** This project began in July 2025 and has already had significant accomplishments, demonstrating the positive momentum of NVDA's brownfield revitalization program and strong community support. Activities are being updated in ACRES in January 2026. Accomplishments are summarized below.

- 23 sites (comprised of nearly 30 parcels) nominated for grant funding in the first 6 months.
- Assessments and/or cleanup plans are complete or in progress for 21 sites throughout 9 towns/cities.
- Enrolled 2 sites in DEC's BRELLA Program.
- Supporting 10 adaptive reuse projects.
- The following activities are complete or in progress during the first 6 months of the project: 11 Phase I ESAs, 3 RBM Surveys, 6 Phase II ESAs, 2 Cleanup Plans, and 3 NDPA Checklists.
- Hosted 7 Brownfield Advisory Committee meetings and presented project plans at a one Town Selectboard meeting.
- Attended one national brownfields conference.

**(2.) 2023 Assessment Coalition Grant (\$1M):** Project accomplishments are summarized below and all outputs and outcomes are accurately reflected in ACRES. Additional ACRES updates will be completed to account for future outcomes.

- 36 sites (comprised of 42 parcels) nominated for funding.
- Phase I/II ESAs were completed for over 30 sites throughout 10 towns/cities. Cleanup Plans and NEPA checklists were prepared for two sites.
- Enrolled 10 sites in DEC's BRELLA Program.
- Created/updated over 40 property profiles in ACRES.
- Supported 26 adaptive reuse projects.
- Leveraged \$1.9M of public and private funds to date.
- Updated project-specific webpage and fact sheets.
- Hosted 16 Brownfield Advisory Committee meetings.
- Attended 1 regional brownfields conference and 1 national brownfields conference.
- Completed 8 Quarterly Performance Reports.
- Final Performance Report to be completed in Winter 2026.

**(3.) 2023 RLF Grant (\$1M):** Consultant procurement was completed to select two QEPs to support the RLF Program. The *Brownfield RLF Policy and Procedures Manual* has been completed to establish the framework for NVDA's program. Four site nominations have been received and two sites have completed the eligibility and loan review process. Cleanup activities are anticipated to be initiated in 2026.

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

**(1.) 2025 Assessment Coalition Grant (\$1.2M):** NVDA has maintained compliance with the workplan, schedule (07/01/25-09/30/29), and EPA terms and conditions. As described in the previous section, significant progress has made in the six months since the project started and the grant is on track to complete the project at least two years ahead of schedule. The first quarterly progress report is on track for submittal by 01/30/26 and all other deliverables will be submitted on time and in compliance with EPA standards. Property profiles in ACRES will be updated within 30 days of completing grant-funded activities and will be updated as needed to reflect current conditions as projects continue moving forward.

**(2.) 2023 Assessment Coalition Grant (\$1M):** NVDA maintained compliance with the workplan, schedule (07/01/23-09/30/27), and EPA terms and conditions and achieved the expected results in just over one year (nearly three years ahead of schedule!). Many of the metrics established in the CA were exceeded. All progress reports and other deliverables were submitted on time and in compliance with EPA standards. All grant funds were expended and the Final Performance Reports will be prepared in Winter 2026, at which time the CA will be formally closed. Property profiles in ACRES continue to be updated as needed to reflect current conditions and additional leveraged funds.

**(3.) 2023 RLF Grant (\$1M):** NVDA has maintained compliance with the workplan, schedule (07/01/23-09/30/28), and EPA terms and conditions. All progress reports have been submitted on time and in compliance with EPA standards. We expect to achieve the metrics defined in the workplan within three years.

## **List of Attachments:**

- A Threshold Criteria Responses
- B VTDEC Letter of Acknowledgement
- C Eligibility Documentation
- D Documentation of Property Ownership
- E Analysis of Brownfield Cleanup Alternatives (Draft)
- F Community Ad Notification Documentation
- G Public Meeting Agenda & Notes
- H Meeting Sign-In Sheet & Zoom Participant List
- I Development Agreement & Site Reuse Concepts

# **ATTACHMENT A**

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## **Threshold Criteria Responses**

**1. APPLICANT ELIGIBILITY:**

**1.a. Applicant Type:** The Northeastern Vermont Development Association (NVDA) is a “Regional Council Established under Government Authority.” NVDA is the regional planning commission and economic development corporation for the Northeast Kingdom (NEK) which is comprised of Caledonia, Essex, and Orleans Counties. Established in 1950, NVDA is comprised of a Board of Directors, at large members (including Legislators), and a professional staff. Each of the 55 towns and villages of Caledonia, Essex and Orleans Counties may appoint two representatives for the Board. Operating under the authority of The Vermont Planning and Development Act (24 V.S.A., Chapter 117), NVDA serves approximately 63,500 people and over 2,000 square miles of the NEK. As a representative of local government, NVDA is charged with making policy decisions at the regional level and then helping to implement those decisions within each community.

Eligibility documentation for NVDA is provided in **Attachment C** and includes:

1. Articles of Incorporation
2. Bylaws
3. Governmental Code (24 V.S.A. § 4341) confirming the authority of NVDA as the regional planning commission and economic development commission.

**1.b. Federal Taxation Exemption Status:** Not applicable. (NVDA is not a 501(c)(4).)

**2. PREVIOUSLY AWARDED CLEANUP GRANTS:** The True Temper Factory Site (“the Site”) has never received EPA Brownfield Cleanup Grant funding.

**3. EXPENDITURE OF EXISTING MULTIPURPOSE GRANT FUNDS:** NVDA does not have an open EPA Brownfield Multipurpose Grant, nor have they ever received a Multipurpose Grant.

**4. SITE OWNERSHIP:** NVDA is the sole owner and will retain ownership through cleanup. The property was acquired via purchase by NVDA on January 26, 2026. Proof of ownership is provided as **Appendix D**.

**5. BASIC SITE INFORMATION:**

**5.a. Site Name:** True Temper Factory

**5.b. Site Address:** 575 Concord Avenue, St. Johnsbury, Vermont 05819

**6. STATUS & HISTORY OF CONTAMINATION AT THE SITE:**

**6.a. Type of Contamination:** Hazardous Substances

**6.b. Operational History & Current Use(s):** The True Temper Factory (“the Site”) was used as a wood dowel/tool handle factory from the late 1800s until ~1989. A portion of the Site was also used as a lumber yard (“Summerville Wood Yard”) to store the materials needed for manufacturing wood dowels/tool handles by the American Fork and Hoe Company (the original manufacturing operation). Between 1900 and 1905, five commercial buildings were added to the site for use as a handle storehouse and a handle shop. From 1912 to 1927, several additional buildings were added for handle storage as well as an office building, a wood sawing building, and a coal shed. From 1943 until at least 1964, five additional buildings were developed for manufacturing handles for agricultural tools. The manufacturing operation was acquired by True Temper, Inc. by the mid-1950s and continued manufacturing wood dowels until ~1989. After the site was sold to a local resident in the 1990s, the site remained vacant but illegal dumping of miscellaneous wastes (including over 70 drums of various hazardous substances) by unknown sources took place from the 1990s through early 2000s. During the time, the owner had relocated out of St. Johnsbury

due to declining health and was no longer able to maintain/secure the property. During site assessment activities completed by NVDA in 2022, over 70 drums were discovered stored in the various buildings onsite. To avoid a potential release to the environment, these drums were characterized and the contents properly disposed of by the prior owner. The site has remained vacant since manufacturing operations ceased in 1989 with the exception of temporary vehicle and heavy equipment storage for surrounding businesses.

**6.c. Environmental Concerns:** A robust Phase II ESA was completed in 2024 followed by a robust Supplemental Phase II ESA in 2025. A brief summary of the findings is provided below:

- (1.) A wide variety of fill is present onsite, including ash, cinders, metal, brick, concrete blocks, rebar, wood, and glassware. The anthropogenic fill was found to extend from ground surface to depths ranging up to 30 feet (ft) below ground surface (bgs), with the majority of fill observed from 7-18 ft bgs. Many other locations contained re-worked native soil consisting of silt, gravel, and cobbles. The embankment located along the perimeter of the wetland was observed to contain debris, exposed ash, and including solid waste observed protruding along the embankment and was not observed at depth within the test pits.
- (2.) Semi-volatile organic compounds (SVOCs) were detected in soil in exceedance of urban background Vermont Soil Standards (VSS), and resident VSS.
- (3.) Metals were detected in soil in exceedance of urban background and resident VSSs.
- (4.) Polychlorinated biphenyls (PCBs) were detected in soil in exceedance of resident VSS in one location.
- (5.) Vanadium was detected in soil in exceedance of resident and non-resident VSSs.
- (6.) Volatile organic compounds (VOCs) were detected in groundwater in exceedance of Vermont Groundwater Enforcement Standards (VGES).
- (7.) Total Metals were detected in groundwater in exceedance of VGES.
- (8.) Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) was detected at concentrations in exceedance of VGES (20 ng/L) at one location. Six additional monitoring well locations were sampled for PFAS. Five of these locations exhibited detections of the five (5) PFAS compounds included in the VGES; however, the detections are below the current PFAS VGES value of 20 ng/L. Detections were greatest along the eastern boundary of the on-Site structure and Site.
- (9.) Regulated Building Materials (RBMs) including PCBs, asbestos, and lead were detected in the on-Site building. Lead in exceedance of hazardous levels were detected in a portion of the building footprint. The building was condemned in September 2024 with over 70% of the roofing partially or fully collapsed, and a compromised structure, allowing the RBMs and lead to be exposed to potential receptors and atmospheric disbursement.

**6.d. Nature & Extent of Contamination:** The Site became contaminated from 100 years of manufacturing operations (described under 6.b) followed by years of illegal dumping activities by unknown sources before the site was secured to prevent further dumping. The nature and extent of contamination is described under 6.c above.

## **7. BROWNFIELDS SITE DEFINITION:**

**7.a. National Priorities List Status:** The subject property is not listed nor proposed for listing on the National Priorities List.

**7.b. Enforcement Action Status:** The subject property 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.

**7.c. U.S. Government Control:** The subject property is not subject to the jurisdiction, custody, or control of the U.S. government.

**8. ENVIRONMENTAL ASSESSMENT REQUIRED FOR CLEANUP GRANT APPLICATIONS:** The following Phase II Environmental Site Activities (ESA) have been completed at the property:

- 1990, Multiple Environmental Site Assessments
- 2024, Phase II ESA (including a Regulated Building Materials Survey)
- 2025, Supplemental Phase II ESA

In addition to the activities described above, other work completed at the site to prepare for cleanup activities includes an aquatic resources assessment, wetland permitting and delineation, an archaeological resources assessment, a building structural engineering assessment, vegetation clearing, geophysical survey, site topographic and boundary survey, limited demolition and debris removal activities and consolidation, characterization and emptying of accessible drums illegally dumped on site. All of this work was completed under the oversight of NVDA and its project partner, the Town of St. Johnsbury.

**9. SITE CHARACTERIZATION:** A response to **Part b** (“for an applicant other than a State or Tribal Environmental Authority”) is provided below.

**9.a. Applicant that is a State or Tribal Environmental Authority:** Not applicable.

**9.b. Applicant other than a State or Tribal Environmental Authority (that is proposing a site eligible for enrollment in a voluntary response program):** As indicated in the letter provided by the Vermont Department of Environmental Conservation (VTDEC) (**Attachment B**), an application for enrollment in the Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) Program was submitted for the Site by NVDA on January 7, 2026. The BRELLA Program manages the cleanup of contaminated soil, groundwater and other environmental media at sites across Vermont. When NVDA and its project partner the Town of St. Johnsbury began Phase II ESA activities at the property in 2024, they requested the support of VTDEC in informing the Phase II ESA scope of work and reviewing the report findings. At that time, VTDEC assigned a Site Manager (Ms. Kassandra Blanco) for NVDA and the Town of St. Johnsbury to work with. As the Site Manager, Ms. Blanco has been involved in reviewing/approving all deliverables (work plans and final reports) on behalf of VTDEC since 2024. As part of enrollment in the BRELLA Program, this partnership with VTDEC and oversight by the Site Manager will continue throughout the cleanup process. Additionally, as noted in the letter provided by VTDEC, a sufficient level of site characterization activities have occurred for remediation work to begin.

**9.c. Applicant other than a State or Tribal Environmental Authority (that is proposing a site *not* eligible for enrollment in a voluntary response program):** Not applicable.

**10. ENFORCEMENT OR OTHER ACTIONS:** No enforcement actions are known nor anticipated for the True Temper Factory Site. There have been no inquiries, or orders from federal, state or local government entities that NVDA is aware of regarding the responsibility of any party (including the applicant) for the hazardous substances at the site. Additionally, there are no environmental liens.

**11. SITES REQUIRING A PROPERTY-SPECIFIC DETERMINATION:** None of the special classes of property that require a property-specific determination in order to be eligible for funding apply to the True Temper Factory Site.

**12. THRESHOLD CRITERIA RELATED TO CERCLA/PETROLEUM LIABILITY:**

**12.a. Property Ownership Eligibility – Hazardous Substance Sites:** Responses to **Part iii** are provided below.

**i. Exemptions to CERCLA Liability:** Not applicable.

**ii. Exceptions to Meeting the Requirements for Asserting an Affirmative Defense to CERCLA Liability:**

Not applicable.

**iii. Landowner Protections from CERCLA Liability:** Responses to **Part 1** are provided below.

**(1) Bona Fide Prospective Purchaser (BFPP) Liability Protection:** NVDA acquired the property after January 11, 2002. Information is provided below to demonstrate BFPP Liability Protection.

**(a) Information on the Property Acquisition:**

- (i) **Method of Acquisition:** NVDA purchased the property from a private owner.
- (ii) **Date of Acquisition:** The property was acquired by NVDA on January 26, 2026.
- (iii) **Nature of Ownership:** NVDA acquired the property via fee simple title and is the sole owner. A copy of the deed is provided as **Attachment D**.
- (iv) **Transferor Information:** NVDA acquired the property from ACR, Inc.
- (v) **Relationships or Affiliations with all Prior Owners & Operators:** NVDA does not have any familial, contractual, corporate or financial relationships or with affiliations with any prior owners or operators of the property.

**(b) Pre-Purchase Inquiry:**

(i) **Types of Site Assessment Performed:** Since 2022, three Phase I ESAs have been completed in compliance with ASTM E1527-21 on behalf of NVDA and/or its project partner the Town of St. Johnsbury. Below is a summary of the Phase I ESAs completed, including the 2026 Phase I ESA completed in support of the property acquisition by NVDA.

- October 7, 2022, Phase I ESA: Report Users = NVDA
- June 19, 2025, Phase I ESA: Report User = Town of St. Johnsbury
- January 21, 2026, Phase I ESA: Report User = NVDA

(ii) **Environmental Professional Qualifications:** The Phase I ESAs listed above were completed by professional environmental consultants that meet the definition of an Environmental Professional as defined in §312.10 of 40 CFR 312. These consultants have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. That Phase I ESAs were developed and performed with all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

(iii) **Bona Fide Prospective Purchaser (BFPP) Provision:** To comply with the BFPP Provision, the most recent Phase I ESA was completed on behalf of NVDA within 180 days prior to the date NVDA acquired the property.

(c) **Timing and/or Contribution Toward Hazardous Substances Disposal:** NVDA affirms all disposal of hazardous substances at the site occurred prior to acquisition by NVDA. NVDA has not, at any time, arranged for the disposal of hazardous substances at the site nor transported hazardous substances to the site. All disposal activities occurred under previous private ownership.

(d) **Post-Acquisition Uses:** The property has been vacant since acquisition by NVDA and will remain vacant until cleanup activities are complete.

**(e) Continuing Obligations:**

a. **Reasonable Steps Taken with Respect to Hazardous Substances Found:** NVDA has never caused nor contributed to contamination nor release of hazardous substances at the Site. NVDA and its project partner, the Town of St. Johnsbury, have funded extensive site investigation activities to characterize the nature and extent of contamination and confirm if impacts were migrating offsite. Upon discovery of illegal dumping at the site in 2022, NVDA and the Town of St. Johnsbury requested the prior property owner secure the site to prevent further dumping activities that were a threat to human health and the environment. Additionally, NVDA and the Town also provided support to the property owner in characterizing and properly disposing of the contents of over 70 drums of various wastes that were illegally dumped by unknown sources. These activities were completed in an effort to cease additional dumping activities and remove decaying drums that posed a threat to human health and the environment should they have a release.

b. **Affirmation of Compliance:** NVDA affirms the following:

- (i) NVDA will maintain compliance with land use restrictions and will not impede the effectiveness nor integrity of any institutional controls.
- (ii) NVDA will assist and cooperate with those performing the cleanup and will provide full access to the property.
- (iii) NVDA will comply with all information requests and administrative subpoenas that have or may be issued in connection with the property.
- (iv) NVDA will provide all legally required notices.

**iv. Sites with Hazardous Building Material that is not Released into the Environment:** Not applicable.

**12.b. Property Ownership Eligibility – Petroleum Sites:** Not applicable.

### **13. CLEANUP AUTHORITY & OVERSIGHT STRUCTURE:**

**13.a. Description of Cleanup Oversight Structure:** NVDA will hire a Qualified Environmental Professional (QEP) to oversee cleanup activities. VTDEC oversees all environmental remediation projects in Vermont. Removal of hazardous waste will be completed under EPA and VTDEC oversight. As described under Part 9 above, the site has been enrolled in VTDEC’s Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) Program. NVDA and its QEP will work closely with EPA and VTDEC to confirm cleanup is protective of human health and the environment. NVDA will procure a QEP and remediation contractor in accordance with the competitive procurement provisions of 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

**13.b. Impact of Cleanup Response Activities on Adjacent & Neighboring Properties:** The True Temper Factory Site occupies a 7.68-acre parcel owned by NVDA. The areas of the Site requiring cleanup are fully accessible within the parcel boundary and contamination has not migrated offsite to surrounding properties. Therefore, access to neighboring or adjacent properties will not be required to conduct cleanup activities.

**14. COMMUNITY NOTIFICATION:** NVDA provided the community with notice of its intent to apply for an EPA Brownfield Cleanup Grant and provided the community an opportunity to comment on the draft grant application package, including the draft ABCA. Community notification details are provided below.

**14.a. Draft Analysis of Brownfield Cleanup Alternatives:** A draft ABCA summarizing the following information was prepared: (1.) the Property and contamination issues, cleanup standards, and applicable laws; (2.) the cleanup alternatives considered (including information on the effectiveness, the ability of NVDA to implement, the resilience to address potential adverse impacts caused by extreme weather events, the cost, and an analysis of the reasonableness); and (3.) the proposed cleanup. A copy of the draft ABCA is provided as **Attachment E**.

**14.b. Community Notification Ad:** A community notification ad (provided at **Attachment F**) was published in the Caledonia Newspaper on January 5, 2026. Printed notices were posted at the locations below on the public information boards where all municipal notices are posted. As required by EPA, these activities were completed at least 14 days prior to submittal of this grant application.

- NVDA’s Office
- Town of St. Johnsbury Municipal Office
- Town of St. Johnsbury Police Department
- Town of St. Johnsbury Library

The community notification ad indicated the following:

- a copy of this grant application, including the draft ABCA, was available for public review and comment;
- where the draft application was located;
- the date, time and location of the public meeting; and
- how to comment on the draft application.

**14.c. Public Meeting:** NVDA presented the ABCA and draft application at the Town of St. Johnsbury’s standing SelectBoard meeting that is open to the public. The meeting was held on January 12, 2026 and included 14 in-person attendees and five virtual attendees (via Zoom).

**14.d. Submission of Community Notification Documents:** The following community notification documents are attached as indicated below.

- Draft ABCA – Attachment E
- Community Notification Ads – Attachment F
- Summary of Public Comments Submitted – Not applicable. (No comments were received.)
- Response to Public Comments Submitted – Not applicable. (No comments were received.)
- Public Meeting Agenda & Notes – Attachment G
- Meeting Sign-In Sheet & Zoom Participant List – Attachment H

**15. CONTRACTORS & NAMED SUBRECIPIENTS:**

**15.a. Contractors:** Not Applicable. A contractor will be procured upon grant award. NVDA will comply with all applicable procurement standards, including 2 CFR Part 200, 2 CFR Part 1500, and 40 CFR Part 33.

**15.b. Named Subrecipients:** Not Applicable. No subrecipients are named nor are any anticipated.

State of Vermont  
Department of Environmental Conservation  
Waste Management & Prevention Division  
1 National Life Drive – Davis 3  
Montpelier, VT 05620-3521  
(802) 828-1138  
[sarah.bartlett@vermont.gov](mailto:sarah.bartlett@vermont.gov)

January 22, 2026

Northeastern Vermont Development Association  
Attn: David Snedeker  
36 Eastern Avenue, Suite 1  
St. Johnsbury, VT 05819

Dear Mr. Snedeker:

Please accept this letter as an acknowledgement that the Vermont Department of Environmental Conservation (VT DEC) has received notice that the Northeastern Vermont Development Association (NVDA) intends to conduct cleanup of a brownfield site, and is applying for a FY26 EPA Brownfields Cleanup Grant.

NVDA has developed an application requesting site-specific federal Brownfields Cleanup funding for the former True Temper site, located at 575 Concord Ave. in St. Johnsbury, VT.

VT DEC affirms that:

- NVDA has requested VT DEC oversight for this project, and VT DEC has reviewed and informed site investigation work plans reports.
- The former True Temper property is currently listed for oversight with the Sites Management Section (SMS) as site #2024-5394 and has been enrolled in the Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) program.
- Based on the environmental site assessments performed to date, as well as information provided by the applicant, VT DEC concurs that the former True Temper site has undergone a sufficient level of site characterization for the development of a Corrective Action Plan (CAP) and for remediation work to begin.

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

Best of luck in the competition.

Sincerely,



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

CC: Jim Byrne – US EPA  
Katy Deng – US EPA

