NARRATIVE INFORMATION SHEET

1. Applicant Identification:
   Sustainable Valley Group INC (SVG)
   50 Depot Street
   PO Box 406
   Bellows Falls, Vermont 05151

2. Website URL:
   https://www.sustainablevalleygroup.org/

3. Funding Requested:
   a. *Grant type:* Single Site Cleanup
   b. *Federal Funds Requested:* $2,590,000

4. Location:
   Village of Bellows Falls, Town of Rockingham, Windham County, State of Vermont

5. Property Information:
   The Former Mill TLR Complex
   10 & 16 Mill Street, Bellows Falls, VT 05101

6. Contacts:
   a. *Project Director*: Gary Fox, Executive Director, 802-376-9534, [redacted]
      50 Depot Street, PO Box 406, Bellows Falls, VT 05101

   b. *Chief Executive:* Dave Bonta, President, 802-376-3838, [redacted]
      50 Depot Street, PO Box 406, Bellows Falls, VT 05101

7. Population:
   Town of Rockingham, Vermont has a population of 4,832 (US Census, 2020 Decennial Census)

8. Other Factors:

Other Factors	**Page #**
Community population is 15,000 or less.	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	n/a
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the 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.	n/a
The reuse of the proposed site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	n/a
The reuse of the proposed site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	3
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	n/a

9. Releasing Copies of Applications/Confidential Business Information:
No portions of this application are confidential, privileged, or sensitive in nature.

NARRATIVE

1. PROJECT AREA DESCRTIPTION AND PLANS FOR REVITALIZATION

Target Area and Brownfields

a. Overview of Brownfield Challenges and Description of Target Area

The Village of Bellows Falls Vermont was once of historical importance due to transportation and industrial capacity garnered from the Connecticut River, which spurred the development of large-scale paper manufacturers and associated rail infrastructure. Bellows Falls is an incorporated village within Rockingham and has a population of 2,747 (2020 Census). Within Bellows Falls, is Bellows Falls Island, which was created due to the building of canals to support early paper mill activities. The proposed Target Area for this cleanup grant is the Bellows Falls Island and Under the Hill District. The Target Area is located within a federally designated Opportunity Zone, along the Connecticut River. For more than a century, the Target Area was a regional employment center and contributed significantly to the prosperity of Bellows Falls. However, with the closure of major mills in the 1980s, the area entered a period of prolonged economic decline. Today, the legacy of these historic industrial uses has resulted in a high density of contaminated, underutilized properties, greatly exceeding other parts of the town and region. Within a 47-acre area, there are 14 identified brownfield sites, including three with institutional controls or environmental restrictions, representing approximately one-third of all parcels. The corridor also contains six active or inactive RCRA sites, and the portion of the Connecticut River bordering the Target Area is classified as Integrated Reporting Category 5, indicating that at least one designated use is impaired or threatened (EnviroAtlas). Nearly 50% of the land area is dedicated to rail and hydroelectric operations, underscoring the intensity of industrial modification. Across the Target Area, properties have documented contamination from petroleum compounds, chlorinated solvents, polycyclic aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), dioxin, and metals.

These brownfield conditions have a substantial and lasting impact on the Bellows Falls community. Vacant and blighted mill buildings, many of which contain asbestos, lead-based paint, and PCBs, pose health and safety hazards. Structural deterioration, exacerbated by deferred maintenance, further limits access and redevelopment potential. The combination of contamination, aging infrastructure, and uncertainty surrounding environmental conditions has suppressed private investment and hindered economic mobility, contributing to broader demographic and fiscal challenges in the community including low household median income, outmigration, above average prevalence of disease, and high rates of poverty. The Village of Bellows Falls experienced a 1.3% population decline between 2010 and 2020; declining school enrollment in the Rockingham School District has resulted in school closures. The physical isolation of the Island, combined with limited riverfront access, has constrained community use, business growth, recreation, and tourism opportunities; it also has led to greater impacts on the downtown district due to decreased traffic and employment.

The EPA Brownfield Cleanup Grant proposed herein will directly address these longstanding challenges by enabling remediation of a key contaminated site identified as a catalytic opportunity in multiple planning efforts. Cleanup will remove significant barriers to investment, protect public health, stabilize historic buildings, and support the revitalization goals in the EPA-supported Bellows Falls Area-Wide Plan (AWP). This investment will advance the transformation of the Bellows Falls Island and Under the Hill District into a vibrant, connected neighborhood supporting economic growth, tourism, housing, education, cultural interpretation, preservation of historic structures central to the community's identity, and public access to the Connecticut River.

b. Description of the Proposed Brownfield Site

The Proposed Brownfield Site is the 0.66-acre Former TLR Complex, located at 10 and 16 Mill Street, within the Target Area. The Site was used for industrial paper manufacturing by several owners from the early 1800s until 1986. Three structures remain onsite: the Russell Building (formerly a carpentry and repair shop located at 10 Mill Street), the Moore Building (formerly used for shipping, office, and storage functions and containing a covered canal segment located at 16 Mill Street), and a small brick outbuilding historically used as a pump house. All buildings are currently vacant and in deteriorated condition due to decades of deferred maintenance and vacancy. Former structures on-Site included a pulp mill and paper manufacturing building that were demolished in 2003 during an EPA removal action. Extensive environmental assessments, including the most recent 2023 Supplemental Phase II ESA and a Supplemental Site Investigation and Evaluation of Corrective Action Alternatives in 2025, document

contamination across multiple media including soil gas, surface and subsurface soil, groundwater, and building materials. More specifically, soil gas beneath and adjacent to both buildings contains benzene, naphthalene, TCE, and PCE at concentrations exceeding Vermont's Vapor Intrusion Standards. These conditions create a significant vapor intrusion risk for any future building use and data indicates that PCE in soil gas is migrating onto the abutting Adam's Grist Mill property. Historic paper mill operations are the likely source of the chlorinated and petroleum VOCs. Surface and subsurface soil contain contaminants consistent with long-term industrial use for paper manufacturing, including PAHs above the Vermont Soil Standards (VSS), low-level dioxins/furans, and metals such as arsenic and lead, along with petroleum-related staining near a former 13,500-gallon fuel oil UST location. In the former building footprints and proposed amphitheater area, PAHs and VOCs exceed the resident VSS in surface soil. Groundwater contains low levels of VOCs and PFAS below VGES, with evidence of VOC natural attenuation and reductive dechlorination. Floor tiles and window glazing contain asbestos in the Moore Building, and lead-based paint was identified on multiple interior and exterior surfaces throughout both buildings, including leachable lead in building materials. Hydraulic oil splashed on the elevator pulley system in the Moore Building contains PCBs and another pulley system in the Russell Building is assumed to be contaminated with PCBs, as it could not be assessed due to deteriorated flooring beneath the system. These materials will require abatement or controlled management.

The TLR Complex is identified as a Tier I Catalyst Site in the 2021 EPA-supported Bellows Falls Island and Under the Hill AWP. Its cleanup is essential not only to address documented environmental and structural hazards but also to address migrating contamination onto adjacent properties. This will enable the redevelopment vision for the Connecticut River Cultural Heritage Center (CRCHC) and surrounding district.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans

The Proposed Brownfield Site is central to the long-standing vision for the CRCHC, first conceived in a 2002 community-led architectural and feasibility study that was later reinforced by a 2009 strategic planning study. The studies established a unified vision to preserve and interpret the region's industrial heritage while activating the buildings with artist studios, galleries, and retail space, workshops, markets, and programming reflecting the area's paper mill, rail, and river-based history. This concept continues to guide community planning efforts as seen in the EPA-supported 2022 Bellows Falls Island and Under the Hill AWP, which reaffirms the TLR Complex as a Tier I Catalyst Site whose redevelopment is essential to revitalizing the Target Area. Each of these studies was deeply rooted in stakeholder engagement, including representatives from a diversity of organizations including the Bellows Falls Historical Society, Town of Rockingham, Preservation Trust of Vermont, Bellows Falls Downtown Development Alliance, Windham Regional Commission (WRC), and the Vermont Arts Council as well as community engagement opportunities with the general public.

Cleanup is essential for enabling this reuse. Environmental assessments have documented vapor intrusion risks from chlorinated and petroleum VOCs, PAHs, VOCs and metals in soil, asbestos and lead-based paint, and PCBs in hydraulic oil, as well as structural deterioration and slab instability. These conditions prevent safe occupancy, hinder renovation, and limit public access. EPA Cleanup Grant funding will allow SVG to mitigate vapor intrusion, abate hazardous building materials, and manage impacted soil. Once cleanup is complete, the buildings will be suitable for the proposed use, which will help catalyze the broader revitalization of the Target Area, advancing economic development, tourism, cultural preservation, housing, and riverfront access as envisioned in the AWP. Redevelopment of this historic site, located outside the floodplain, will reinvigorate an important community asset by creating new opportunities for local artists and small businesses, supporting storytelling, workforce and creative-economy development, and intergenerational learning, all while preserving and reactivating historic architecture and transforming the district into a vibrant cultural and economic destination for residents and visitors.

d. Outcomes and Benefits of Reuse Strategy

Cleanup and redevelopment of the TLR Complex will generate significant public health, environmental, economic, and cultural benefits for the Target Area, particularly for the children, older adults, and low-income households who have lived closest to the Site and are most vulnerable to its effects. Remediation of vapor intrusion risks, contaminated soil, and hazardous building materials will eliminate current exposure pathways to chlorinated and petroleum VOCs, PAHs, metals, asbestos, lead-based paint, and PCBs, risks that disproportionately impact residents

with limited economic or health resources. This will result in 0.66 acres cleaned, and two buildings equating to 11,200 square feet ready for revitalization. Following cleanup, the TLR Complex will be activated as part of the CRCHC. This reuse will provide direct benefits to the very populations most affected by the brownfield conditions. Low-income households, seniors, and children, many of whom lack access to year-round cultural, educational, and recreational programming will benefit from accessible community workshops, intergenerational learning opportunities, and events hosted by trusted local organizations. The creative-economy programming, including artisan studios and workshops, will support emerging artists and small creative businesses, offering new avenues for income generation and job training in a community with high poverty rates and limited employment opportunities. The location of the project, adjacent to the downtown core and within walking distance of many older homes, makes it especially valuable for residents who lack reliable transportation. Redevelopment will improve walkability, add safe pedestrian connections between the Island and Under the Hill, and create inclusive gathering spaces such as a public amphitheater. These improvements expand healthy, no-cost community amenities for households that may not otherwise have access to recreational or cultural facilities. By stabilizing and reusing historic mill buildings, the project preserves a meaningful part of Bellows Falls' identity while creating welcoming, accessible spaces for people of all ages and income levels. The project also supports long-term climate resilience through improved stormwater management, engineered barriers, and the reuse of existing structures. Collectively, these outcomes ensure that the people who have lived for decades with the burdens of contamination will be the first to benefit from the Site's transformation into a vibrant cultural and economic anchor that advances community priorities.

Strategy for Leveraging Resources

e-g. Resources Needed for Site Characterization, Remediation, and Reuse

The project has identified sufficient resources for characterization and remediation, with EPA Cleanup Grant funds requested herein being sufficient to cover cleanup planning and implementation costs. Should project needs arise, the VT DEC Brownfields Financial Assistance, WRC Brownfield Reuse Initiative, and the WRC RLF have been identified for assessment and cleanup. Initial identified site reuse resources are included below.

Name of Resource *(identified not secured)*	**Additional Details**
Northern Borders Regional Commission Catalyst Program	Community infrastructure and economic development; awards up to $1mil; fits CRCHC public access and connectivity improvements.
Vermont Community Development Program - Implementation Grant	Supports rehabilitation of community facilities and public infrastructure; up to $1mil for eligible projects.
Vermont Arts Council – Cultural Facilities Grants	Supports interior cultural space upgrades, accessibility, and energy improvements; awards up to $30,000.
Vermont Building Communities Facility Grant	Supports facility improvements in underinvested communities, aligned with CRCHC reuse.
USDA Rural Community Development Initiative Grant	Supports community facility improvements and economic development; awards up to $500,000.

h. Use of Existing Infrastructure

The reuse plan for the Proposed Site includes revitalizing and improving two historic buildings onsite, a 6,000 square foot, three story brick building known as the Russell/Carpenter Building and a 5,200 square foot brick building known as the Moore/TLR Building built in approximately 1869. The Proposed Site benefits from substantial existing infrastructure that supports efficient and cost-effective redevelopment including municipal water, public wastewater, and roadway access. Leveraging this existing capacity will facilitate adaptive reuse, reduce redevelopment costs, and support improved pedestrian and vehicle connections to downtown and the Island as envisioned in the AWP.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. The Community's Need for Funding.

The Target Area is located within a federally designated Opportunity Zone and within one of the most economically distressed communities in Vermont. Bellows Falls is a small, rural community with a population of 2,747. Bellows Falls has limited fiscal capacity, as demonstrated by a poverty rate of 19%, more than double the state (9%); the

median income is nearly $30,000 below that of the state ($54,836 and $82,730, respectively). This significantly hinders the ability to address brownfield conditions.

Indicator (ACS, 2023 5-year estimates, unless noted)	**Bellows Falls**	**Vermont**	**United States**
Population change (2010 to 2020; 2010/2020 Decennial Census)	**-1.3%**	2.8%	7.4%
Senior Population (65+)	**20.9%**	22.9%	18.0%
Median Household Income	**$54,836**	$82,730	$81,604
Poverty Rate	**19.1%**	9.0%	12.1%
Cost Burdened Households (rent ≥30% income)	**57.1%**	49.8%	50.4%
Unemployment Rate	**2.9%**	1.7%	2.9%
Education (bachelor's degree or higher)	**29.3%**	45.1%	36.8%
Occupied Housing Units Built Before 1980	**92.3%**	55.2%	47.7%
Vacancy Rate	**16.7%**	16.8%	5.7%

Bolded indicators notate distress factors above/below State or national averages.

The scale and complexity of contamination within the Target Area exceed local financial resources. The Village's limited tax base and long-standing economic challenges prevent it from undertaking costly brownfield remediation, and private-sector investment has been deterred by environmental uncertainty and cleanup liability. Without EPA Cleanup Grant funding, the TLR Complex will remain vacant and blighted, continuing to impede economic recovery and revitalization efforts. EPA funding is therefore essential to advance the community's vision in the AWP, demonstrate progress, and attract additional investment to the Target Area.

b. Health or Welfare of Sensitive Populations

Nineteen percent of the population of Bellows Falls lives in poverty and the median household income is about two-thirds of Vermont's statewide average. According to ACS data, 19% of households receive food stamps/SNAP, indicating a high level of economic insecurity that limits a family's ability to absorb additional health or environmental burdens. According to EnviroAtlas, 90.3% of households in the Target Area are below the quality-of-life threshold income. Bellows Falls also has a high proportion of sensitive age groups: approximately 19.8% of residents are under 18, and over a quarter (27%) are over age 62. Children and older adults are more vulnerable to environmental exposures because of developing or compromised immune systems, higher respiratory sensitivity, and mobility limitations that may restrict their ability to avoid or respond to environmental hazards. These vulnerabilities intersect with brownfield conditions in the Target Area. The Proposed Site contains documented vapor intrusion risks from chlorinated and petroleum VOCs. Children are particularly susceptible to these contaminants because of higher breathing rates and developmental sensitivities, while older adults, especially those with pre-existing respiratory or cardiovascular conditions, face elevated health risks from chronic exposure even at lower concentrations. Hazardous building materials, including asbestos and lead-based paint, present additional risks to these age groups if left unaddressed. Economic insecurity further amplifies sensitivity to environmental conditions.

The cleanup of the Proposed Site will directly reduce these exposure pathways by addressing vapor intrusion risks, removing hazardous materials, and stabilizing deteriorating structures. Remediation will also reduce blight-related stressors, improve safety, and create healthier public spaces that serve children, older adults, and low-income households disproportionately affected by current conditions. In doing so, the project will lessen cumulative environmental health burdens and support improved long-term health and welfare for the most vulnerable residents of Bellows Falls and the Target Area.

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

According to the CDC Places tool, the census tract encompassing the Target Area has higher prevalence of adult asthma (11.8%), cancer (9.5%), coronary heart disease (7%), and depression (28.8%) than national averages (10.5%, 7.8%, 6.5%, and 22.1%, respectively). Moreover, according to the Vermont Department of Health, an estimated 23% of blood level tests for 1- and two-year-olds are elevated, higher than statewide. Exposure to contamination from brownfield sites places an additional health burden on sensitive populations and may exacerbate conditions such as asthma, cancer, and other chronic diseases. Research also has shown the connection between poverty, economic opportunity, neighborhood blight, and mental health. The Proposed Brownfield Site presents an increased risk of exposure to the community through identified exposure pathways. The cleanup facilitated by this grant would

remove exposure pathways to known contaminants, reduce the risk of disease and adverse health conditions, and promote a safer, cleaner environment for residents.

d. Economically Impoverished/Disproportionately Impacted Populations

As described above, the Target Area experiences high rates of people living in poverty, significantly lower median incomes, and a higher unemployment rate than the State of Vermont (2.9% and 1.7%, respectively). The Target Area once hosted numerous paper mill companies that physically altered the environment to promote operational efficiencies and productivity. As the industry shuttered, the Target Area and many historic buildings have deteriorated with little private investment, leading to unsafe structures, blight, and widespread environmental contamination such as VOCs, metals, and petroleum. These challenges have greatly impacted businesses in downtown Bellows Falls, leading to cascade effects such as outmigration (population decrease of 1.3% compared to VT increase of 2.8%, 2010-2020), increased vacancy rates, and aging infrastructure and homes.

This EPA Cleanup Grant will directly help to reduce these challenges by cleaning up an identified catalyst site in the Target Area. The Proposed Brownfield Site is envisioned as an integral part of the CRCHC and will celebrate and share the rich history of the Target Area through experiential learning and hands-on displays and an on-site amphitheater which will host educational programming and community performances. The Proposed Brownfield Site will also support local artists and businesses by creating a marketplace designed to attract people of all ages and tourists from the region. This is expected to have ripple effects on the greater Bellows Falls community and is expected to increase employment and median household income.

e-g. Project Involvement and Project Roles

Organization/Contact	Mission/Role in Project
WRC: Sue Westa, Associate Director / Brownfields Program Manager swesta@windhamregional.org 802-257-4547 ext. 108.	**Mission**: Assist towns in Southeastern VT in providing effective local governance and collaboratively addressing regional issues. **Role**: Support with grant admin, including EPA coordination, ACRES assistance, budget tracking, guidance on contracting, and recordkeeping.
VT DEC: Lynda Provencher, Sites Manager lynda.provencher@vermont.gov 802-249-5562	**Mission**: Preserve, enhance, restore, and conserve VT's natural resources and protect human health for current and future generations. **Role**: State regulatory authority providing environmental review, technical assistance, and regulatory guidance and oversight to ensure compliance with state and federal requirements.
Town of Rockingham: Alex Torpey, Interim Municipal Manager: manager@rockbf.org 802-376-9780	**Mission**: Provide municipal services and governance to support the health, safety, and economic well-being of the community. **Role:** Local regulatory coordination, support with community outreach efforts, and integration with land use, permitting, and redevelopment planning.
Bellows Falls Historical Society: Cathy Bergmann, bfhistoricalsociety@gmail.com 802-376-9876	**Mission**: Preserve and promote the history of the Village of Bellows Falls. **Role:** Historical documentation and guidance to support culturally appropriate redevelopment and identification of historic resources.
Bellows Falls Downtown Development Alliance: Casey Griffin, bfdda1@gmail.com 802-460-2333	**Mission**: Promote and support revitalization initiatives and economic development within the Bellows Falls Designated Downtown through collaboration with community organizations and municipal leadership. **Role:** Support community engagement, redevelopment advocacy, and coordination with downtown revitalization initiatives.
Vermont Arts Council: Susan Evans McClure, sevanmcclure@vermontartscouncil.org 802.402.4573	**Mission**: Build a VT where artists thrive and everyone has access to creativity in their lives, education, and communities. **Role:** Support integration of arts, culture, and heritage into reuse strategy to promote placemaking and equitable outcomes.

g. Incorporating Community Input

The vision for the Priority Brownfield Site has been deeply built upon a shared community vision for decades and is reliant on collaboration amongst a diversity of organizations, institutions, and businesses to be successful. SVG plans to implement this cleanup grant under the same guiding values of collaboration and transparency. SVG will leverage established relationships with community-based organizations, the Town of Rockingham, and community leaders to understand community concerns, ideas, and questions. To do so, SVG will invite relevant representatives from community-based organizations, many previously involved in the reuse visioning efforts, to participate in a stakeholder coalition. The stakeholder coalition will meet at least three times, with in-person and virtual options, during the grant period to support integration of community concerns and priorities into the ABCA/cleanup plan, inform the development and implementation of a reuse resource roadmap, build consensus on next steps and opportunities, and celebrate the successful cleanup effort. SVG will host a kick-off meeting with in-person and virtual attendance options to review cleanup objectives and the ABCA, and the redevelopment vision including historic preservation elements, and provide opportunities to understand community ideas, concerns, and questions. The community will be able to ask questions or comment on the project through a submittal form on the website or by calling or emailing directly. SVG will regularly (min. quarterly) address community questions and provide timely updates on platforms such as a dedicated project page on SVG's website and SVG's established newsletter; additional outreach methods will be explored with the stakeholder coalition and may include social media updates, project flyers, and site visits. Updates will be given at Town Selectboard meetings on at least an annual basis. Major milestones and updates will be published in popular local channels such as the local newspaper.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

Based on cumulative results of testing and previous site investigation results, the Proposed Cleanup Plan will include installation of a soil vapor extraction (SVE) system to conduct source area removal of soil gas contaminated with chlorinated and petroleum VOCs. This will eliminate the vapor intrusion risk to Site users as well as reduce the toxicity, mobility and mass of contamination in sub-slab soil gas. Pilot testing demonstrated that the SVE system will achieve cleanup goals within one year of operation. Pilot testing also indicated that structural improvements to the buildings are necessary for the SVE system to operate effectively. As such, the Cleanup Plan will include sealing cracks in the floor, replacing a section of collapsed floor in the northern building, and reinforcing a deteriorating canal wall in the southern building to eliminate short circuiting and leaks from the applied vacuum of the SVE system. Source area remediation will enable safe reuse of the historic mill buildings and prevent offsite migration of PCE and petroleum VOCs to the adjacent property. In addition, the Proposed Cleanup will include asbestos abatement prior to redevelopment including all friable asbestos or asbestos containing building materials. Exterior and interior surfaces with deteriorating lead-based paint will be abated or encapsulated to mitigate direct exposure risk and potential migration of exterior flaking paint to soil. Moreover, the Proposed Cleanup Plan will include the decontamination of the elevator pulley system in the southern building contaminated with hydraulic oil containing PCBs. A pulley system in the northern building is assumed to be contaminated with hydraulic oil containing PCBs, however, has not been tested due to safety concerns including a collapsed floor beneath the pulley system. This collapsed floor is planned to be replaced and will assist with both effective operation of the SVE system and the decontamination of the pulley system. Lastly, soil management and the installation of engineered barriers will mitigate direct contact risk to contaminated soil across the Site. Engineered barriers will consist of green space and landscaping around the exterior of the buildings, including an earthen amphitheater designed to accommodate the current topographic relief at the Site and designed in accordance with the VT DEC IRule prescriptive thickness. Hardscaping engineered barriers will include a pedestrian walkway and a road connecting the Island to the Under the Hill District. The Site is currently overgrown with vegetation and Site clearing will be performed to support the installation of engineered barriers. A small volume of soil is planned to be managed offsite to accommodate exterior features including a stage associated with the amphitheater and a viewing platform exhibiting the historical canal wall in the Moore Building (southern building). Construction debris generated during CAP implementation will be properly managed.

Description of Tasks/Activities and Outputs

b-e. Project Implementation, Anticipated Project Schedule, Task/Activity Lead, and Outputs

Task 1: Project Management and Administration	**d. Lead:** SVG **Assistance:** WRC, QEP

b. Project Implementation:

EPA-Funded: SVG will administer and implement all required grant responsibilities including financial and reporting. SVG will execute a cooperative agreement with WRC to support the grant and assist SVG with grant management. SVG and WRC will prepare an RFP to identify and retain a QEP in accordance with applicable procurement policies. SVG and WRC will coordinate meetings at least quarterly with the QEP, VT DEC, and EPA. SVG, with support from WRC, will prepare quarterly progress reports and closeout documents within ACRES. Non-EPA Funded: SVG will identify and pursue reuse funding.

c. Anticipated Project Schedule: October 2026 – June 2029

• Cooperative Agreement: Oct. '26 • Prepare RFP and administer: Dec '26- Jan '27 • Meetings, reporting, closeout: Jan '27 – June '29

e. Outputs: 1 cooperative agreement, bid document for QEP services, 1 QEP contract, meeting minutes and agendas, 11 quarterly reports, 11 ACRES database updates, and EPA closeout documents.

Task 2: Community Outreach	**d. Lead:** SVG **Assistance:** QEP, WRC

b. Project Implementation:

EPA-Funded: SVG will host a public meeting to kick off the grant and gather input on the proposed cleanup plan/ABCA. SVG will develop a Community Involvement Plan (CIP). The CIP will be implemented throughout the grant and will include project updates/response to community concerns; this approach will ensure meaningful community involvement (min. quarterly) and will include strategies such as a project webpage, newsletter updates, articles in the local paper, social media posts, and flyers around town, and presentations to the selectboard. SVG will facilitate 3 stakeholder meetings to support planning and outreach.

c. Anticipated Project Schedule: February 2027 – June 2029

• CIP: Feb. '27 • Public Meetings: Nov '26 and May '27 • CIP Implementation: Feb. '27 – June '29

e. Outputs: One CIP; public meeting sign-in sheet and minutes; project webpage, 6 public updates, 3 selectboard updates, public comments received and responses issued, agendas and meeting minutes from stakeholder coalition meetings, newsletter updates, project flyers, and social media posts.

Task 3: Cleanup Planning	**d. Lead:** QEP **Assistance:** SVG, WRC

b. Project Implementation: EPA-Funded: The QEP will facilitate the completion of applicable historical assessments and submit to EPA for review and submission to State Historic Preservation Office to ensure the proposed cleanup complies with applicable state and federal requirements such as the National Historic Preservation Act. QEP will facilitate a structural assessment to inform building enhancements required for corrective action implementation. QEP will update the ABCA following public comments and finalization of reuse plans. The QEP will prepare and submit a Corrective Action Plan (CAP) to the VT DEC and EPA. The QEP will develop a SSQAPP for data collection efforts anticipated during CAP implementation and bid documents in compliance with organizational, state, and federal regulations. The QEP will hold a competitive bid process in accordance with federal rules, including 2 CFR 200, 2 CFR 1500, and EPA rules 40 CFR 33 and applicable policies to select appropriate contractors/subcontractors. Contracts will be executed for cleanup construction.

c. Anticipated Project Schedule: April 2027 – August 2027

• Historic Assessments: April '27 • Update ABCA and Prepare CAP: May '27 • SSQAPP: June'27 • Bid Process for Contractors/Subcontractors: July '27 • Contractor/Subcontractor Contracts Executed: August '27

e. Outputs: Archeological Resource Assessment, Historic Structure Assessment, Structural Assessment; Final ABCA; approved CAP; cleanup bid documents; site walk; cleanup contractor contract(s).

Task 4: Cleanup Implementation	**d. Lead:** QEP **Assistance:** SVG, WRC

b. Project Implementation: EPA-Funded: The QEP will obtain all necessary permits. Contractors/subcontractors will mobilize/demobilize to site for CAP implementation. Section 106 mitigation measures, if required by SHPO and EPA, will be implemented. QEP will oversee the implementation of the CAP as described above; all applicable iron, steel, and manufactured products will comply with Build America Buy America (BABA). The QEP will ensure the corrective actions meet state and federal standards. Upon completion a CACCR will be prepared by the QEP; institutional control will be recorded in land record.

c. Anticipated Project Schedule: August 2027 – June 2029
• CAP Implementation: August '27 – March '29 • CACCR: April '29 - June '29

e. Outputs: Permits including asbestos and lead abatement DOH permits, soil management waste profile, electrical and building permits, stormwater construction permit; BABA and DBRA documentation; historic mitigation (as applicable); engineering barriers installed; as-built drawing for engineered barriers; SVE system installed; as-built drawing and operation and maintenance manual for SVE system; data from SVE monitoring efforts; asbestos and lead abated/encapsulated; PCB decontamination completed; soil excavated; canal wall/floor reinforced; waste manifests; CACCR; institutional control recorded.

f. Cost Estimates

Budget Categories		Project Tasks ($)					
		Project Management	Community Outreach	Cleanup Planning	Cleanup Implementation	Administrative Costs	**Total**
Direct Costs	Personnel	$8,700	$6,120	--	--	$4,800	**$19,620**
	Fringe Benefits	--	--		--	--	--
	Travel	--	--		--	--	--
	Equipment	--	--		--	--	--
	Supplies	--	--		--	--	
	Contractual	$17,180	$15,900	$65,400	$461,200	$12,200	**$571,880**
	Construction	--	--	--	$1,998,500	--	**$1,998,500**
Total Direct Costs		$25,880	$22,020	$65,400	$2,459,700	$17,000	**$2,590,000**
Total Indirect Costs		--	--	--	--		--
Total Budget		**$25,880**	**$22,020**	**$65,400**	**$2,459,700**	**$17,000**	**$2,590,000**

Task 1 – Project Management: Personnel (SVG): assumes $60/hr*145 hours = $8,700 (MOU development, meetings, review QEP proposals, project oversight); Contractual (WRC): assumes $65/hour*200 hours = $13,000 (MOU, support with QEP RFB and contracting, attendance at meetings); Contractual (QEP): assumes two staff virtually attend 11 project team meetings (assumes rate $190/hour*22 hours) = $4,180

Administrative Costs: Personnel (SVG): assumes $60/hr*80 hours = $4,800 (ACRES reporting, Davis Bacon and BABA compliance review, revisions to EPA budget and scope of work, payment requests); Contractual (WRC): technical assistance with compliance, support with grant reporting/admin, ($65*100) = $6,500; Contractual (QEP): support with ACRES /quarterly reports and closeout docs ($190*30 hrs.) = $5,700

Task 2 Community Outreach: Personnel (SVG): facilitation of stakeholder coalition, including initial engagement, 3 meetings, and regular updates (assumes $60/hr*48 hrs); 3 selectboard updates ($60/hr*6); monthly newsletter updates ($60/hr*36); 3 public meetings ($60/hr*12) = $6,120; Contractual (QEP): CIP preparation ($190*10 hrs) = $1,900; public meeting preparation and attendance, assumes 4 public meetings, 2 staff attending in person ($2,000/meeting = $8,000); Support with 3 stakeholder coalition meetings including prep and facilitation ($2,000/meeting = $6,000)

Task 3 -- Cleanup Planning: Contractual (QEP): conduct historical and structural assessments ($20,000, estimated from experience with similar task); finalize ABCA and prepare CAP ($190/hr*20hrs+$155/hr*40hrs = $10,000); prepare a Health and Safety Plan and SSQAPP = $5,000 (estimated from like reports); contractor procurement including development of bid documents, site walk, evaluation of bids, subcontracting ($190/hr.*160 hrs.= $30,400) = $65,400 (estimate provided by QEP opinion of probable cost)

Task 4 -- Cleanup Implementation: Construction (Subcontractors): Cost estimate provided by QEP in opinion of probable cost, based on like projects and Vermont Dept. of Transportation construction cost estimating tool. Asbestos abatement –2,800 sf @ $37/sf = $103,600; Lead abatement –5,520 sf @ $27.5/sf = $151,800; SVE = $179,600 (includes 12 carbon changeouts = $138,400, shakedown and startup = $15,900, monitoring for 1 year = $20,700; electrical costs/year = $4,600); Site Clearing = $44,100; Installation of Engineered Barriers: landscape – 21,300 sf @ $6/sf = $127,800, amphitheater – 7,000 sf @ $11/sf = $77,000, hardscape – 4,000 sf @ $24.5/sf = $98,000; Soil excavation – 1000 cy @ 26.20/cy = $26,200; Soil Management – 1,500 tons @ $164/ton = $246,000; Decon of

Pulley Systems = 2 @ $30,000/each = $60,000; Foundation reinforcement – Northern Building – 3,100 sf @ $20/sf = $62,000; construction and debris waste transportation and disposal – 1,500 tons @ $20/ton = $30,000; Canal wall reinforcement – 4 @ $54,400 = $217,600, Historic Mitigation = $5,500; Mobilization/Demobilization (10% construction costs) = $142,400; BABA compliance (10% construction costs to source and purchase construction materials produced in the US) = $142,400; Contingency (20% per 2 CFR 200.433) = $284,700; Contractual (QEP) Permitting = $60,000 (asbestos and lead abatement Dept. of Health permits, soil management waste profile, electrical and building permits, stormwater construction permit); Construction Oversight = $45,600; CACCR = $10,000; Project Management (assumes 10% of budget) = $203,200, Contractor Markup (assumes 10%) = $142,400

g. Plan to Measure and Evaluate Environmental Progress and Results

SVG will track, measure, and report project outputs and performance through quarterly reports and updates to ACRES. The project team will meet at least quarterly to track progress towards completing tasks and outputs described in the table above. Quarterly EPA reports will include project expenditures and progress updates. If necessary, the project team will take corrective actions to ensure the project is meeting budget, schedule, and scope requirements. Project outputs, including square footage abated, volume of soil managed, SVE system installation milestones, and reductions in contaminant concentrations, will be tracked by the QEP and verified through field documentation and sampling results. Upon completion of cleanup activities, the QEP will prepare a CACCR documenting all remedial actions, confirmation sampling results, volumes of material managed, installation of engineered barriers, and all regulatory approvals. This report will be submitted to EPA and VT DEC to document the achievement of cleanup objectives and ensure transparency and accountability throughout the project lifecycle.

PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure

SVG maintains strong internal controls and oversight systems that ensure effective grant administration and financial stewardship. The Board conducts annual performance reviews of the Executive Director (ED) and receives monthly financial statements, grant expenditure reports, and accounts-payable/receivable updates, which the Board reviews for accuracy and alignment with the approved budget. The Board meets regularly with the ED to monitor progress on grant tasks, procurement, and compliance with federal and organizational policies. SVG uses standardized accounting software with segregation of duties, where a bookkeeper manages day-to-day transactions, the ED approves expenditures and monitors grant budgets, and a CPA performs annual filings and compliance reviews. For each grant, SVG maintains structured task schedules, budget trackers, and compliance checklists, and preserves organized digital and physical records for contracts, leases, permits, inspections, and grant documents to ensure readiness for reporting and audits. Volunteers assist with limited operational tasks under ED oversight.

a. Description of Key Staff

The ED, Gary Fox, will be responsible for overall grant implementation and will work closely with WRC on the procurement, project development, and implementation. Mr. Fox has worked extensively on brownfield assessment and redevelopment projects throughout Bellows Falls. In his role as ED of the Bellows Falls Area Development Corporation, he worked with state agencies on the clean-up of the Robertson Papermill, which had a mix of state and federal grants including EPA RLF and direct cleanup grant. Mr. Fox managed all 5 funding sources through closeout including quarterly reporting needs and ACRES updates, and requisition requests. The Founding Director and President, Dave Bonta, lead and oversaw facility improvements at 30 Island Street; he brings knowledge of adaptive reuse of buildings, including weatherization needs, as well as an understanding of developing robust funding stacks inclusive of bonds and tax credits to make projects a reality. His experience conducting community outreach and education has led to robust community support and input on past projects.

b. Acquiring Additional Resources

WRC will support administration of grant and brownfield redevelopment processes such as procuring qualified professionals. WRC has been in continuous operation for over 50 years with a plethora of experience supporting communities with planning, community outreach, and coordination with state and federal government across the region. WRC has ten highly qualified staff with a combined more than 80 years of professional experience including

staff with experience in grant administration and finance, planning, and brownfield redevelopment. More specifically, Sue Westa, WRC's Associate Director, has over seven years' experience managing EPA Community-Wide Assessment Grants and EPA Brownfields RLF and over 35 years working in community development and planning. Over this time, she has overseen a roster of QEPs conducting site-specific assessment and remedial planning efforts across the region, including the Proposed Brownfield Site. WRC will help to create a work plan and financial workflows to ensure project completion. From past experience, Sue is well-versed in the procurement of QEPs and all requirements, such as BABA. Through WRC's Brownfield Program, Sue has established relationships with the VT DEC and EPA; this will help to ensure proper administration of EPA brownfields funding. She is also familiar with ACRES and EPA reporting requirements. SVG will procure a QEP early in the grant process to support technical needs and compliance with applicable state and federal regulations, including fair and open competition requirements at 2 CFR 200, 2 CFR 1500, and 40 CFR 33. Apart from cost, experience preparing bid specifications, procuring qualified contractors, and successful implementation of cleanups at brownfield sites within Vermont will be key criteria of the selection process. We anticipate the QEP supporting proper procurement of qualified, experienced, and professional contractors to implement the Proposed Cleanup Plan. If necessary, we will work with the VT DEC and EPA to identify expertise and resource gaps.

Past Performance and Accomplishments

e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements

(1) Purpose and Accomplishments

SVG has not previously received an EPA Brownfields Grant**,** but has successfully managed multiple federal, state, and non-profit funding sources for community redevelopment, economic development, and infrastructure projects. As a Local Development Corporation, we see adaptive reuse of historic buildings as an impactful strategy, that when paired with our mission to advance a local green economy through workforce development, energy efficiency, renewable energy, and sustainable business incubation, holistically addresses brownfield challenges from a variety of angles. Since 2003, SVG has implemented redevelopment projects in post-industrial communities, including Springfield and Bellows Falls, Vermont. For example, SVG purchased and rehabilitated a long-vacant, water-damaged industrial mill building, transforming it into a productive 5,500 square foot incubator facility. As part of the effort, in partnership with Vermont Department of Vocational Rehabilitation and the Vermont Department of Corrections' Non-Violent Offender Workforce Training Program, eight workers were trained in construction and building trades. The revitalized space then supported two businesses. With a USDA Rural Business Development Grant, SVG established a commercial kitchen incubator facility, which when full, provided 12 FTE. These efforts demonstrate SVG's capacity to successfully administer a variety of federal, state, and institutional grants, and to translate that public investment into lasting community and economic outcomes.

(2) Compliance with Grant Requirements

SVG has a strong track record of complying with grant workplans, schedules, reporting requirements, and financial oversight standards including USDA Rural Business Development Program, USDA Community Facilities Program, and the Community Development Block Grant Program, as well as state grants and private funding. SVG leadership also has experience working with Federal Transit Administration grants as well as EPA RLF and grants. SVG routinely implements federally funded projects in communities with high proportions of low- and moderate-income residents and complex environmental conditions. Grant compliance practices include timely reporting, transparent financial management, community engagement documentation, outcome tracking, and coordination with state and federal partners. SVG's experience managing multi-partner, multi-funding-source projects directly supports its ability to successfully administer an EPA Brownfields Cleanup Grant and ensure compliance with all applicable requirements.

ATTACHMENT A. THRESHOLD CRITERIA RESPONSES

1. **Applicant Eligibility**
    a. Sustainable Valley Group, Inc. is a 501(C)(3) nonprofit organization founded in 2003. See Attachment C.
    b. Sustainable Valley Group, Inc. is not exempt from Federal taxation under section 501(c)(4).

2. **Previously Awarded Cleanup Grants**
   The proposed Site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Funds**
   Sustainable Valley Group, Inc., does not have an open EPA Multipurpose Brownfields Grant.

4. **Site Ownership**
   Sustainable Valley Group, Inc. is the sole owner of the subject Site under fee simple title, and intends to retain ownership for the full duration of the proposed brownfield grant-funded project period

5. **Basic Site Information**
    a. *Site Name*: Former TLR Complex
    b. *Address*: 10 & 16 Mill Street, Bellows Falls, Vermont 05101

6. **Status and History of Contamination at the Site**
    a. *Contamination*: Previous environmental assessments of the Site identified releases of petroleum products from a No. 6 fuel oil UST and chlorinated solvents from an unknown source, likely from use of the Site for paper manufacturing. VOC contamination is primarily in soil gas and soil; groundwater concentrations of VOCs are below applicable standards. PAHs and metals are present in shallow soil across the Site. Asbestos containing materials is present in the buildings and lead-based paint is present on both the interior and exterior of the building. PCB contamination from hydraulic oil is on an elevator pulley system in the southern building and a pulley system in the northern building may also be contaminated but has not been tested for PCBs due to undermined flooring beneath the pulley, currently making the pulley system inaccessible. PCBs are present at levels above 10 micrograms per 100 square centimeters (µg/100 cm^2) on non-porous surfaces. PCBs are presumed to have been released from a source or sources with unknown PCB concentrations before 1979.

    b. *Operational History and Current Use*: Past land use at the Site dates to at least 1802 when the Site contained portions of two of the seven mills residing in Bellow Falls on the banks of the Connecticut River. The complex of paper mills changed ownership several times until activities ceased in 1986. The three remaining buildings on the Site were formerly used as a carpenter repair shop;

shipping, office, and storage with a former covered canal running through the building; and a pump house. Portions of the Site became vacant and the canal was eventually in-filled as the paper mill industry declined. In the early 2000s the United States Environmental Protection Agency performed a removal action for asbestos containing material and razed buildings on the eastern portion of the Site. The Site was purchased by Sustainable Valley Group, Inc. in 2023 and has remained vacant. The remaining buildings require structural restoration due to years of delayed maintenance, repair, and upkeep.

c. *Environmental Concerns*: Previous environmental assessments of the Site identified petroleum and chlorinated solvent VOCs in soil gas near and beneath the remaining buildings on the Site. VOCs, PAHs, and metals are present in soil on the open space of the Site.

   The following exposure pathways are present on-Site posing risk to public health and the environment:
   - Vapor intrusion of benzene, naphthalene, PCE, and TCE, into the on-Site buildings following renovations;
   - Vapor intrusion of PCE and TCE into the adjacent Adams Grist Mill building at 20 Mill Street.
   - Direct contact to contaminated soil in the proposed amphitheater area and other open green spaces.
   - Direct contact to PCB containing hydraulic oil in the southern building and possibly the northern building.
   - Inhalation of friable asbestos in the buildings.
   - Ingestion and inhalation of lead-based paint.

d. *How the Site Became Contaminated and Nature/Extent of Contamination*: The apparent sources of both petroleum and chlorinated VOCs are from historical use of the property as a paper mill, where the Site previously housed industrial paper manufacturing facilities for over a century. Chlorinated and non-chlorinated solvents are inferred to have been used during the maintenance and cleaning of paper making machinery and ancillary equipment. Benzene and naphthalene, and other aromatic hydrocarbons are, at least in part, derived from a release of bunker oil in 1991. Residual bunker oil remains in soils in the immediate area of the former UST west of the Southern Site building. Other releases of petroleum products, from either stored fuel or maintenance, are likely given the Site's long history of industrial uses.

   VOC contamination is primarily on the western side of the Site near Mill Street. Previous environmental assessments of groundwater and soil gas along the upgradient property boundary suggest that contaminants are not migrating onto the Site from an upgradient source. Contamination also does not appear to be leaving the Site above applicable standards in groundwater or soil gas, except for the southwestern edge of the Site where a soil gas sample on the adjacent Adams

Grist Mill property detected PCE at concentrations exceeding the applicable standards.

PAHs and metals are present in soil from use of industrial fill material and the location of the Site being in an urban setting. PAHs and metals are more prevalent in soil where there is evidence of fill material including wood, brick, and coal rubble.
Existing sources of PCBs at the Site include hydraulic fluids within the pulley system for the elevator on the second floor of the southern building. PCBs were not released to the building floor beneath the pulley, but splashing is present on the wooden beams and walls. There is a pulley system in the northern building that was not assessed due to safety concerns; however, this pulley system may also be contaminated with PCBs.

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

8. **Environmental Assessment Required for Cleanup Grant Applications**
Environmental assessments conducted at the site since 1991 are listed below and have revealed the presence of petroleum and chlorinated VOCs, PAHs, metals, PCBs, asbestos containing building materials and lead-based paint.
   - Response to release of 1,500 gallons of No. 6 fuel oil. Included tank closure and contaminated soil removal. Identified petroleum VOC and PCE and TCE contamination at the Site.
     - Griffin International Inc. completed a Limited Site Assessment in 1991
     - Griffin International, Inc. completed an Underground Storage Tank Closure and Site Assessment in May 1993
     - Griffin International, Inc. completed a Site Cleanup Report: Phase I and II in 1993
     - Griffin International, Inc. completed a Soil Boring Installation: Phase III in 1994
   - Tetra Tech completed a Targeted Brownfield Assessment in September 2001 where they identified large quantities of asbestos containing material.
   - USEPA Removal Action to address asbestos containing material
     - USEPA completed a Pollution Report 2 in November 2003
     - USEPA completed a Pollution Report 3 in February 2004
   - Tighe and Bond completed a Phase I ESA in January 2004
   - Tighe and Bond completed a Targeted Brownfield Assessment in September 2004
   - Stone Environmental completed a Partial Brownfields Assessment III Report in 2008
   - LE Environmental completed an Environmental Data Gap Analysis in March 2018
   - Stone Environmental completed a Phase I ESA in 2022

- Stone Environmental completed a Supplemental Phase II ESA in 2023 to address the data gaps identified in the 2018 Environmental Data Gap Analysis. This Supplemental Phase II ESA represents the date of the Phase II for the purpose of meeting the assessment requirements for this Cleanup Grant Application.
- Stone Environmental completed an Evaluation of Corrective Action Alternatives (ECAA) in December 2025 to assess remediation alternatives for petroleum and chlorinated solvent VOCs.

9. **Site Characterization**
   The Site is eligible to be enrolled in the Vermont response program, is currently enrolled, and has a sufficient level of Site characterization for remediation work to begin. See Attachment D for a letter from the Vermont Department of Environmental Conservation.

10. **Enforcement Other Actions**
    There are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

11. **Sites Requiring a Property-Specific Determination**
    The Site does require a Property-Specific Determination as there has been a release of PCBs and part of the property is subject to TSCA remediation. See Attachment E for Property-Specific Determination.

12. **Threshold Criteria Related to CERCLA/Petroleum Liability**
    Sustainable Valley Group, Inc. asserts that we meet the Bona Fide Prospective Purchaser CERCLA Liability Protection. Both hazardous substances and petroleum contaminants are present and co-mingled at the Site; the hazardous substances are considered the predominant contaminant, therefore, we have decided to respond to the property ownership eligibility questions for hazardous substance sites in the USEPA *FY26 Guidelines for Brownfield Cleanup Grants*.
    To demonstrate alignment with EPA requirements please see details below:
    - ***a.*** *Information on Property Acquisition:* The subject Site was deeded to Sustainable Valley Group, Inc. on December 1, 2022 from the Town of Rockingham. Sustainable Valley Group, Inc. has sole, fee simple, ownership of the Site. There are no familial, contractual, corporate, or financial relationships or affiliations between Sustainable Valley Group, Inc. and all prior owners or operators (or other potential responsible parties) of the subject Site.
    - ***b.*** *Pre-Purchase Inquiry:* AAI compliant (ASTM 1527-21) Phase I ESA was completed by Stone Environmental, Inc., qualified environmental professionals as defined by AAI, for Sustainable Valley Group on November 20, 2022.
    - ***c.*** *Timing and/or Contribution Toward Hazardous Substances Disposal:* Sustainable Valley Group, Inc. has not caused or contributed to the release of any hazardous substances at the Site. Any disposal of hazardous substances on the subject Site occurred prior to Sustainable Valley Group, Inc. acquiring the property. Sustainable Valley Group, Inc. has not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

d. *Post-Acquisition Uses:* Following acquisition of the property, Sustainable Valley Group, Inc. has continued to restrict access to the Site while it remained vacant. There have been no users of the Site since Sustainable Valley Group, Inc., acquired the Site.

e. *Continuing Obligations:* Sustainable Valley Group, Inc. has continued to maintain fencing to restrict access to the buildings, maintained locks on the building doors, and has conducted additional Site assessments (Phase II ESA in 2023 and ECAA in 2025) to assess potential remedial cleanup solutions.

Sustainable Valley Group, Inc. confirms and affirms its committed to:

i. Complying with any land use restrictions and not impeding the effectiveness or integrity of any institutional controls;

ii. Assisting and cooperating with those performing the cleanup and providing access to the property;

iii. Complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and

iv. Providing all legally required notices.

13. **Cleanup Authority and Oversight Structure**

The Vermont Department of Environmental Conservation (VT DEC) will have authority and oversight of the cleanup activities. Sustainable Valley Group, Inc. will comply with applicable local, state, and federal laws and regulations and ensure that the cleanup actions will be protective of human health and the environment. Cleanup activities will be completed in accordance with the VT DEC's Investigation and Remediation of Contaminated Properties Rule (IRule) and 40 CFR 761.61(c). Any technical expertise needed to support this cleanup within this award will be retained in a manner that complies with the competitive procurement provisions of 2 CFR 200.317 through 200.327, including a competitive bid process. A QEP will work with Sustainable Valley Group, Inc. to design, prepare specifications and bid documents, oversee and document remediation activities at the Site, as well as assist with the interface between the VT DEC, and EPA. The QEP will also assist with the competitive bid process for selecting the contractor(s) to perform the proposed cleanup actions. The QEP will be selected prior to initiating cleanup activities.

Previous environmental assessments have not identified contaminant migration from the property onto adjoining properties, except for PCE and TCE detected in soil gas on the abutting Adams Grist Mill property at 20 Mill Street. Access to the Adams Grist Mill property is not anticipated for initial remediation activities. However, if access is needed an access agreement will be attained. The owners of the Adams Grist Mill site have been accommodating of previous environmental assessment activities. All adjoining property owners will be notified of the proposed cleanup activities in accordance with VT DEC IRule and will have an opportunity to provide comments during a 30-day public comment period.

14. **Community Notification**
    Sustainable Valley Group, Inc., published and provided opportunities for the public to comment on both the ABCA and subject grant application, which were made available in the Rockingham Town Clerk's office and SVG's website. The public notice was published in the local newspaper, the Brattleboro Reformer on January 6, 2026; the notice was also linked on the Town of Rockingham Public Notice webpage. A community meeting was held on 1/20/26 to discuss the application and invite public comment; the meeting was held in-person with a virtual attendance option. The meeting included a time for public comment; moreover, the public notice offered an opportunity for written or verbal feedback to be shared with SVG via email or phone. To support additional engagement, presentations on the grant application and ABCA were also given at the Bellows Falls Historical Society meeting on January 22, 2026 and Bellows Falls Rotary meeting on January 22, 2026; these meetings also had an opportunity for question and comment. A copy of the draft ABCA, Community Notification, Summary of Comments Received and Responses to those Comments, Meeting Notes from the Public Meeting, and Meeting Sign-In sheet can be found in Attachments F-J.

15. **Contractors and Named Subrecipients**
    Contractors have not been procured. The subject proposal includes Windham Regional Planning Commission as named Subrecipient. Windham Regional Commission is eligible for a subaward as a unit of government and meets all applicable criteria for a subrecipient pursuant to 2 CFR 200.332.

VERMONT

AGENCY OF NATURAL RESOURCES

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

January 5, 2026

Sustainable Valley Group, Inc.
Attn: Dave Bonta, President
30 Island Street
Bellows Falls, VT 05101

Dear Mr. Bonta:

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

SVG has developed an application requesting site-specific federal Brownfields Cleanup funding for the TRL Complex brownfield site, located at 10 & 16 Mill Street in Bellows Falls, VT.

VT DEC affirms that:

- SVG has requested VT DEC oversight for this project.
- The TRL Complex is currently listed for oversight with the Sites Management Section (SMS) as site #2002-2989 and has been enrolled in the Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) program.
- Based on the environmental site assessments performed to data, as well as information provided by the applicant, VT DEC concurs that the TRL Complex 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 SVG as you progress in your cleanup activities.

Best of luck in the competition.

Sincerely,

Sarah Palmer Bartlett

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

CC: Dorrie Paar – USEPA
Annemarie Fortune – Stone Environmental