

# VILLAGE OF VALLEY FALLS, INC.

P.O. Box 157, Valley Falls, New York 12185

## Village of Valley Falls, NY – old Thompson Mill Site Applicant Information Sheet

- 1) Applicant Identification:  
Village of Valley Falls, New York  
PO Box 157, 11 Charles Street, Valley Falls, NY 12185-0151
- 2) Website URL:  
<https://www.HistoricValleyFalls.com>
- 3) Funding Requested:
  - a. *Grant Type:* Single Site Cleanup
  - b. *Federal Funds Requested:* \$4,000,000
- 4) Location:
  - a. *City:* Village of Valley Falls
  - b. *County:* Rensselaer County
  - c. *State:* New York
- 5) Property Information:  
*Property Name:* Old Thompson Mill  
*Site Address:* 273 Poplar Street, Valley Falls, NY 12185  
*See attached map*
- 6) Contacts
  - a. *Project Director*  
Kristina Younger  
518-527-6577  
[vfthompsonmillprojectmanager@gmail.com](mailto:vfthompsonmillprojectmanager@gmail.com)  
PO Box 157, Valley Falls, NY 12185
  - b. *Chief Executive/Highest Ranking Elected Official:*  
Mayor Jay Overocker  
518-753-6230  
[vvftrusteejpo@gmail.com](mailto:vvftrusteejpo@gmail.com)  
PO Box 157, Valley Falls, NY 12185
- 7) Population  
510 residents (2020 Census)

8) Other Factors Checklist:

<b>Other Factor</b>	<b>Page # in Narrative</b>
<b>Community population is 10,000 or less.</b>	<b>1, 4</b>
<b>The proposed site is adjacent to a body of water.</b>	<b>1, 2, 3, 4</b>
<b>The proposed site is in a federally designated flood plain.</b>	<b>1, 2, 3</b>
<b>The proposed site will improve local resilience to the impacts of extreme weather events and natural disasters to protect residents and community investments</b>	<b>2, 3</b>
<i>None of the Other Factors are applicable.</i>	

9) Releasing Copies of this Application:

No portion of this application is confidential, privileged, or sensitive.

Attachments:

Map of Valley Falls, NY and Old Thomspen Mill Site

# ATTACHMENT: MAP OF VALLEY FALLS, NY AND OLD THOMPSON MILL SITE

(Source: *Historic Valley Falls Brownfield Opportunity Area (BOA) Plan*)

**Site 10** is the old Thompson Mill site.

The site includes four tax parcels/sites (22.16-3-2.1, 22.16-3-1.2, 22-9-2.13 and 22.16-3-1.1)

**MAP 3.11. Potential Brownfields + Vacant Sites in the Valley Falls BOA**



# NARRATIVE – Village of Valley Falls, Cleanup of old Thompson Mill

## (1) Project Area Description and Plans for Revitalization

### Target Area and Brownfields

*a. Overview of Brownfield Challenges and Description of Target Area:* Valley Falls, New York, a historic village on the National Register, is a modest rural community of 185 households, a **total population of 510 residents** (Census tract 36083051800) and **considered a micro-community**. **The Village of Valley Falls, the Target Area, is only 0.5 square miles** and lies on the boundary of the towns of Pittstown and Schaghticoke and is divided by the Hoosic River. The Target Area is generally bound by Route 67 and Bunker Hill Rd to the north, Riverview Drive to the east, Coons Road to the south and Powder Mill Rd to the west. The Village was founded at the turn of the 20th century due to its prominent **location on the Hoosic River**. By 1863, the Village was a mini-industrial center with rail line access, the availability of water and waterpower for several mills, general stores, hotels, foundries, cartwright, farrier, and blacksmith shops. Unfortunately, today the Village is a shadow of its former self - a bedroom community with a very small residential tax base. There are no retail establishments, healthcare services, grocery stores or other amenities remaining in the Village, causing residents to travel to meet their basic needs. The closest senior center and grocery store is in Hoosick Falls, 16 miles away. There is no public transportation in the Village. Village life centers on the Free Library, churches, and the Community Hall. Broadband access is also lacking. The housing stock is dominated by houses dating back to or before the turn of the century.

The Thompson Mill represented the soul of the Village of Valley Falls. For over 100 years, this important mill defined the town – employing most of its residents with a workforce of 110 in its heyday. When the James Thompson & Company moved its textile operation to Mexico in 1992, the old mill sat derelict for 25 years, and then in 2009, it went up in arson-created flames. The Village similarly declined. However, the mill’s prominent location is the gateway to the Village, it sits on a remarkably scenic bend of the Hoosic River, where Native American artifacts and Revolutionary War history abound, and it provides hope for a different future- **one that can be an example of a great American comeback!**

In the late 1800’s, when the mill complex was developed, nearby properties were developed for commercial uses that are long gone. The area is struggling with the many effects associated with abandoned and underutilized brownfields, including former dry cleaners, automotive repair facilities and other former commercial and industrial uses that left a wide array of environmental contaminants. As a result, the Thompson Mill, located in the heart of the Target Area, is a visual reminder of the blight and other environmental challenges faced by this rural micro-community following years of decline, resulting in little to no redevelopment, decreased property values, safety issues, diminished investment, and exposure to contaminants. The Thompson Mill site is known to be contaminated by semi-volatile organic compounds (SVOCs), heavy metals, as well as hazardous building materials (HBM) including asbestos containing material (ACMs), lead-based paint (LBP) and polychlorinated biphenyls (PCBs). The Hoosic River, a productive fishery, is impacted upstream with PFAS and PCBs contamination. In February 2024, a freight train derailed in the Village, dumping three hopper cars of polypropylene pellets into the river, many of which washed up on the Thompson Mill property. Sensitive populations living in the Target Area include families with children and women of childbearing age, low-income, underrepresented groups, veterans, and seniors (see 2.a.11.1) and this grant is critical to help reverse some of the environmental, economic, and health and welfare challenges the Village has faced for decades.

*b. Description of the Proposed Brownfield Site(s):* **The Village has identified three (3) of the four (4) parcels that comprise the 23-acre Thompson Mill complex, located at 273 Poplar Street, as well as an adjacent land-locked privately owned parcel potentially impacted by the former mill as its top Priority Sites (labelled as site 10 in Attachment 1).** This mill complex is developed on the north end with one remaining approximately 13,000 sq. ft., three-story brick former mill building, that was structurally damaged by the historic 2009 fire and continues to deteriorate. A number of former mill building foundations are visible along with rubble from their collapsed or demolished structures. The complex is adjacent to both youth recreational fields and residences, separated by a rail line. Located in the center of the Target Area and **along the banks of the Hoosic River, the Thompson Mill Site is in the federal floodplain.** Former onsite mill activities included fabric dyeing and other manufacturing and milling operations. In addition, portions of the site have been used for illegal solid waste dumping. Known contamination identified during limited investigation activities include

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heavy metals (chromium, lead, mercury, arsenic and others), SVOCs, PCBs, LBP and asbestos in building materials. Impacted building debris is in soils around the former mill facility and the adjacent privately owned parcel. The continued building collapses after the 2009 fire have exacerbated the extent and comingling of contaminants and significantly damaged the buildings, which are now a magnet for vandalism and crime, and a significant safety hazard. A structural analysis has deemed the building unsafe to access. Investigational activities around the building can't be safely performed within the 'fall zone' of the building or the building footprint. **The most feasible cleanup alternative requires the structure to be demolished and the contaminated rubble to be transported to a hazardous materials disposal facility.** Since petroleum storage and heating sources were co-located with other mill operations, and because of the fire, there may be residual petroleum compounds co-mingled with hazardous substances at this site. The Village wants to **reclaim its riverfront** and reuse this property to build a passive recreational green space that will provide river access to the public and includes walking trails, fishing/boat access, and historical displays of the significance of the mill in the Village's history. Cleanup of this site is critical to implementing this revitalization plan.

The negative impacts associated with the old Thompson Mill are significant. The mill's peak production years were prior to the advent of environmental regulation and were in fact a reason that the former owner of the mill cited when it abandoned operations in Valley Falls and moved manufacturing to Mexico and other locations in 1992. In addition, the Hoosic River is a food source for area residents, which hosts bass and other sensitive fish and wildlife species in which the types of contaminants released from these sites have the potential to bioaccumulate. There are also several areas at the mill complex where there are known archeological artifacts, and the potential exists for significant artifacts to be uncovered in other areas of the Site where paleosol soils were identified. If the Thompson Mill site remains unremediated, **future flood events** will further spread the known contaminants from the Site downstream. The Valley Falls Census tract is in the 75<sup>th</sup> percentile (compared to NYS) for proximity to facilities with Risk Management Plans (RMPs), despite being rural. This could indicate that the area is exposed to additional, non-regulated contaminants based on the density of facilities and that the health of residents is burdened by documented exposure to PFAS compounds, also known as "forever chemicals", a group of endocrine disrupting chemicals (EDCs) that have been linked to certain cancers and thyroid dysfunction.

### **Revitalization of the Target Area**

*c. Reuse Strategy and Alignment with Revitalization Plans:* The Village's vision, embodied in the 2024 preliminary Waterfront Park designs for passive recreational green space, can only be realized if the hulking skeleton of the burned-out old mill occupying the southern bank of the river in the floodplain, and its impact to the environment, are cleaned up. It is a safety hazard (structurally and due to accessible HBM) and an eyesore as you enter the Target Area. Village Board discussions and community forums on alternate uses of the mill site and revitalization of the Target Area have led to the successful Historic District designation of the Village and its recent designation as a Brownfield Opportunity Area (BOA) by the State of New York. With community involvement already initiated and expected at every step in this tight-knit community, success is guaranteed.

The 2024 Historic Valley Falls BOA Plan ([www.HistoricValleyFalls.com](http://www.HistoricValleyFalls.com)) provides a robust framework for revitalizing the Target Area. Bringing the mill complex and other brownfields sites back to beneficial reuse is a key component. The Village's BOA planning process generated a brownfields revitalization and redevelopment plan to enhance local public-private engagement, stimulate an improved quality of life, and spur investment and economic activity in the Target Area. The proposed riverfront park and redevelopment of vacant brownfields properties will dramatically transform the Target Area in alignment with the community's goals of 1) historic character preservation; 2) celebration of natural beauty by expanding recreational resources; 3) support a lively, multi-generational economy; 4) upgrade the Village's infrastructure; and 5) encourage economic development. Removal of blight is integral to addressing the environmental, health and safety concerns associated with these sites, as well as the introduction of a recreational greenspace that will attract visitors from the region, preserve and enhance river ecology, increase extreme weather resilience, bring much needed commercial business to the Target Area residents and create a destination for local tourism. **The 2024 Historic Valley Falls BOA Plan proposes a comprehensive approach to revitalizing strategic sites (including the waterfront park), new**

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**buildings, adaptive reuse of existing buildings, areas for public parking, new trailheads, and walking loops. Cleanup of the Mill site is the cornerstone to this plan.**

*d. Outcomes and Benefits of Reuse Strategy:* With a 23-acre waterfront park as an anchor and gateway, the historic Village of Valley Falls will retain a stable population and improve housing values and extend the walkability of the Target Area. It will attract visitors that stimulate the establishment of park-related businesses, such as kayak rental, coffee shops, restaurants, and private investment in the historic village, bringing in jobs. Redevelopment of underutilized properties will generate local tax revenue and expanded tax base, create job opportunities, stimulate community pride, and spur economic activity and growth in this small Village. When paired with the 2018 National Historic Register and the 2024 NYS Brownfield Opportunity Area (BOA) designation, the Village will be able to more fully articulate and quantify the economic benefits of this renewal. The creation of local jobs and services is an exciting benefit that assessment and cleanup of the priority sites will allow.

Cleaning up the eyesore at the entrance to the Village will also increase community attractiveness to additional residential and commercial development. The community will also benefit from the decrease in crime (vandalism and trespassing), increased opportunities for recreational activity and a healthier lifestyle and access to the waterfront. As a flood prone site and federally designated floodplain, the future park will be designed for extreme weather resilience.

The location of the mill site adjacent to the Hoosic River, within the 100-year floodplain, is of concern in times of high water, such as extreme weather events. If the site remains unmediated, the contaminants could be spread downstream to other communities if/when the site floods. With the increase in the number and severity of major storm events, the removal of this risk is a significant benefit. The removal of hazardous building materials and contaminants from the site will provide greater flood storage and improve health conditions and allow the site to be opened to the public and provide access to the waterfront. New river access will increase awareness and care of natural resources. Reuse as green space will provide environmental benefits in terms of flood resiliency, increased wildlife habitat, and improved water quality. Return of the site to vegetation will bolster environmental resiliency by providing a flood area buffer zone to the Village that currently does not exist. Use of the site for renewable energy projects is not applicable due to its propensity to flood.

### **Strategy for Leveraging Resources**

*e. Resources Needed for Site Characterization:* No further assessment is required to characterize the site for remediation. However, the Village could seek **EPA TBA** services or NYS BOA funding if supplemental site characterization activities deemed necessary at a future date.

*f. Resources Needed for Site Remediation:* The EPA funding requested should be enough to complete the remediation of the old Thompson Mill site. If the EPA Cleanup grant award is insufficient to complete the remediation needed, the Village can seek additional funding from **NYS Community Development Block Grant (CDBG) Vacant Property Clearance Program** for up to \$1M of demolition costs.

*g. Resources Needed for Site Reuse:* Once the cleanup is complete, the Village will seek funding sources at the state and regional level to support park development. Sources include **the NYS Environmental Protection Fund, the Hudson River Foundation Hudson River Improvement Fund, the Hudson River Greenway, the At-Grade Railroad Crossing Improvement Fund, the Northern Border Regional Commission, and the Restoration Fund administered by the Hudson River Natural Resource Trustees** for redevelopment. In addition, the Village will seek **USDA ReConnect Loan and Grant Program, the NY “connectALL” fund** or other infrastructure sources to provide broadband service, as the lack of broadband is a large economic drag to redevelopment / revitalization. The mill’s location on a major tributary to the Hudson River opens additional potential fund sources. **The Village has a pending application for an additional \$175K in NY State BOA funding** for the development of land use regulations, and a traffic study. Designation on the National Historic Register and BOA are all part of the strategy to bring the necessary resources for brownfields cleanup and redevelopment to the table.

*h. Use of Existing Infrastructure:* The Village will be able to use existing municipal infrastructure readily

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available at the old Thompson mill site, such as water, sewer, gas, and electricity to support proposed redevelopment and reuse activities. Existing infrastructure in the area has the capacity to handle this work. The proposed redevelopment of the Mill Site does not currently include buildings or other facilities requiring electricity, water, heat, or sewer, as only passive recreation is envisioned, but includes sustainable and green design components. However, the existing at-grade railroad crossing on the private road leading to the site will require safety upgrades to accommodate public use. There is a dedicated **NYS transportation funding** resource for this purpose that the Village will apply for at the appropriate time.

### (2) Community Need and Community Engagement

#### Community Need

*a. Community's Need for Funding:* Due to its **extremely small, rural population (510)**, the Village, considered a **micro-community**, does not have the financial resources to complete brownfields cleanup/reuse planning activities on its own. The annual operating budget of the Village is \$168,200. In addition, there is an annual \$104,500 debt service and maintenance costs for the sewage treatment system and plant built in 2004. This \$2.1 million project was a significant undertaking for a Village this small; but was necessary to address raw sewage flowing into the Hoosic River. The service debt costs are borne by the users of the system. The existing debt obligations for the sewer add financial strain on a Village with extremely limited revenue. The **Village's population of 510 people**, and lack of industrial/commercial tax base, also limits its ability to leverage the needed capital from its residents. The Bureau of Economic Analysis data on Personal Income shows income in Rensselaer County, which includes the Target Area, on a per capita basis is dropping relative to the rest of New York State, from 19th in 2012 to 27th in 2013. This is compounded by the current state of the economy and inflation, which impacts the Village and its residents' ability to carry out remediation of brownfields properties in the Target Area.

*b. Health or Welfare of Sensitive Populations:* **As of the 2020 census, there were 510 people in the rural Village of Valley Falls (target area)**, continuing a downward trend in population while the number of households is stable. Of the 185 households, 20.8% had children under the age of 18 living with them. The average household size is 2.33, down from 2.6 in 2016. **The EPA database highlights lead paint exposure above the national average (0.54 vs.0.3), the wastewater discharge indicator (45th percentile in NY), RMP Facility Proximity (75<sup>th</sup> percentile in NY), and aging population (20% vs. 17% in NYS) as relevant pollution and socioeconomic indicators for the Village and Target Area. Veterans (a sensitive population) comprise 6.5% of the population as compared to 3.6% in NY state (ACS). The cancer rate (7) is also higher than NYS (6.3) and the US (6.4).** Other than the 15 residents who work from home / walk to work, all remaining 253 workers commute to their place of employment, with an average commute time of 40 minutes, 43% longer than the average metropolitan commute time of 28 minutes (ACS). This results in the Transportation Access Burden. In addition, the Target Area is a **critical gap service area for broadband at 5% compared to 12% in NYS and 13% in the US**. The NYS DEC Information Locator also notes that **the James Thompson dam is an Intermittent Hazard Dam which denotes a downstream hazard potential of a dam failure neighboring the site.**

In the village, **the sensitive populations include 26.47% under the age of 18 and 15.5% who were 65 years of age or older. Median income is \$77,750 and 1.3% of the population are below the poverty line. 96% of the population 15 or older is not enrolled in college / higher education (2020 Census).** Target Area residents are exposed to contaminants daily via dermal contact, ingestion, and/or inhalation, including children passing sites on their way to the ballfield or school, dust and/or runoff during storm/flood events, consuming fish from the river adjacent to the mill complex or drinking VOC impacted groundwater. **Regional studies of PFAS have shown impact not just to the Hoosic River, but also evidence of PFAS in the air and soil. The state and federal health databases do not take emerging contaminants such as PFAS into consideration. The health of sensitive populations is threatened by an understudied regional contaminant contributed by upstream facilities located in the nearby Village of Hoosick Falls.** This brownfield funding will allow the Village to further assess contaminants and reduce exposure to contaminants in soil, groundwater, indoor air, surface water and/or sediment as well as hazardous building materials. Through this grant, the rural historic village will benefit

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by the identification and reduction of health hazards, reduction of crimes like arson, trespassing, vandalism, and illegal dumping at the mill site, and increased investment in the area.

*c. Greater than Normal Incidence of Disease & Adverse Health Conditions:* Given the very small size and population of the Valley Falls and Target Area community, health data statistics are not readily available from public information databases. According to [www.statecancerprofiles.gov](http://www.statecancerprofiles.gov), Rensselaer County, where the Target Area is located, has a **higher rate of cancer incidence** (536.3 per 100,000) than New York State (487.7) or the US (453.8), which translates into higher mortality from cancer (187.9 per 100,000 vs. 162.3 for NYS). The EPA database indicates that the Target Area's high proportion of children under 5 (66th percentile) suffers from lead paint exposure (81% in US), and according to CDC, **52% of the population suffers from Asthma. According to NY State Department of Health, of the 5,054 births that occurred in Rensselaer County between 2006-2008, 106 were determined to suffer from birth defects.** According to the CDC, **approximately half of the population in Rensselaer County as of 2017-2018 is obese.**

Specific contaminants identified in the brownfields are known contributors to area health issues. Residents, particularly children and the elderly, are at elevated risk from completed exposure pathways, necessitating action to address these hazards. It is reasonable to presume Target Area residents are adversely affected from exposure to VOCs (liver, kidney, nervous system damage; **birth defects; cancer**), heavy metals – including lead (immune, cardiovascular, developmental, gastrointestinal, neurological, reproductive, respiratory, kidney damage; **cancer**), petroleum (nervous system, immune, liver, kidney, respiratory damage; **cancer**), PAHs (liver disorders; **cancer**), as well HBM including asbestos (lung scarring, mesothelioma and lung **cancer**) and PCBs (immune, hormone and neurological system; liver and skin disease). **High prenatal exposure to PAHs is associated with cognitive dysfunction, childhood asthma and other adverse birth outcomes.** The cleanup and/redevelopment of the Target Site as a recreational open space will reduce these threats, create recreational opportunities, and improve the overall physical health and wellbeing of Target Area residents.

*d. Economically Impoverished/Disproportionately Impacted Populations:* Negative health impacts are disproportionate in the Village's sensitive populations (see above). The sensitive populations in the target area (including children under 5, senior citizens, veterans, and low-income individuals) disproportionately share the cumulative negative environmental consequences resulting from multiple stressors, including brownfields. Despite being only 0.5 square miles, the target area contains 16 brownfields, highlighting the disproportionate burden of the historic manufacturing in this former mill town. The mill abandonment and ongoing deterioration has hurt the Village's revitalization potential and adds to the burden faced by sensitive populations in town. The entire Village is underserved due to its rural status, lack of commercial activity, small population, and has unfair exposure to regional PFAS contaminants. This grant will directly address the primary threat of contamination from these priority sites, mitigate exposure, eliminate blight, decrease crime and provide an outlet for outdoor, waterfront recreation – a documented mental health booster! This grant will help to provide the community with access to the waterfront that has been denied due to years of industry and subsequent decay. Implementation of this grant will reduce the loss of population, encourage investment, improve property values, and increase access to services and job opportunities. Valley Falls will ensure that Target Area community groups are included in all information distribution, meetings, and events. Throughout the process, Valley Falls will encourage the reuse of brownfields to eliminate blight, provide jobs, create affordable housing and improve quality of life to ensure the sensitive populations and underserved communities benefit from developments that shape their neighborhoods.

### Community Engagement

*e. Project Involvement:* The Village of Valley Falls Board, together with its Brownfields Advisory Committee (BAC), a panel of citizen advisors from community organizations making partnership commitments to this project, will use three basic strategies in our tool kit – public meetings and workshops, web-based publication, and smaller meetings and consultations. This is consistent with the Village's lack of broadband access, which limits the effectiveness of offering live on-line or hybrid events. The Village's partnerships with community organizations to encourage involvement in the planning and implementation

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of this project are shown in the table below.

*f. Project Roles:*

Name of organization / entity / group & mission	Point of contact (name, email, and/or phone)	Specific involvement in the project or assistance provided
Hudson-Taconic Lands— <i>preserves open space</i>	Bob Crowley [REDACTED]	Cleanup and Reuse planning / Park design and community outreach support / BAC
Hoosic River Watershed Assoc. – <i>citizens group</i>	Andy Kawszak [REDACTED]	Outreach support, BAC, volunteer labor, participate in cleanup and reuse planning
Valley Falls Free Library	Julie Weston <a href="mailto:manager@valleyfallslibrary.org">manager@valleyfallslibrary.org</a>	Outreach support, meeting space and Information Repository
Valley Falls United Methodist Church	Richard Palmer, 518-753-4848 [REDACTED]	Outreach support, volunteer labor, meeting space
Pittstown Historical Society	Constance Khell, <a href="mailto:pittsownhs@gmail.com">pittsownhs@gmail.com</a>	Outreach support, historical information and advice, cleanup/reuse planning activities
Valley Falls VFW Post 1938	Harry Rifenburg, 518-753-7707 No email.	Outreach support to veterans, volunteer labor

There are no business organizations in the Village because there is little commercial activity. Because the desired future use for the top priority mill property is public green space, realtor involvement would come into play as there are several properties currently for sale, where the burned-out mill at the major entrance to the Village is an obstacle to housing sales and a downward influence on home values. The Village will collaborate with area realtors to promote plans to assess, remediate and improve the mill site to improve property values in the Village.

*g. Incorporating Community Input:* In conjunction with the 2024 BOA Plan, the Village held several successful community outreach events and incorporated the feedback into the Plan. For this grant, the Village will require the Qualified Environmental Professional (QEP) to produce project newsletters suitable for distribution to the public at major project milestones. This newsletter will be produced in both paper and electronic formats. Electronic versions will be distributed through our community organization partners, and through the [www.historicvalleyfalls.com](http://www.historicvalleyfalls.com) website. Paper copies will be made available at Town Hall, the Free Library and the Community Hall – the hubs of Village life. The Village Free Library in the Target Area will be the Information Repository and location for hard copies of all program-related documents for review by the public. **As a rural area, broadband internet service is not universally available or subscribed to by all households. Therefore, the village uses paper-based communication in addition to electronic communication.** There is a local paper covering the area, the Express, and this media outlet will be used. The Village has a Facebook page that has achieved 275 followers, which has been a valuable tool to announce and promote the program, communicate progress, solicit input, provide feedback, and advertise meetings. The Village will consider and respond to all community input.

### (3) Task Descriptions, Cost Estimates, and Measuring Progress

*a. Proposed Cleanup Plan:*

Based on the previous Site assessment activities conducted and the intended future redevelopment of the Site for passive recreation, remediation is required to address the unsafe derelict building that contains HBM and any impacted soil within the building footprint. Fire damage to the Site building and its subsequent deterioration have compromised the structural integrity and prevented access to impacted soils beneath the building footprint. Three cleanup alternatives were considered for the Site in the Analysis of Brownfields Cleanup Alternatives (ABCA). The Proposed Cleanup Plan includes complete abatement, complete demolition and removal of one foot of soil within the building footprint and under debris piles.

The demolition of the building will allow for bulk-loading of all HBM for off-site disposal. Any remaining drums and ASTs will also be properly removed and disposed. Once the HBM has been remediated and the dangerous building remnants have been removed, one foot of impacted soil beneath the building and rubble

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piles will be excavated for off-site disposal at an appropriately licensed landfill or recycling facility. Limited conformation soil testing will be performed beneath the building slab, as needed, to complete the delineation and characterization of the soil impacted by releases of HBM and/or waste from former mill operations. A geotextile fabric will be installed and clean backfill will be placed for positive drainage.

### Description of Tasks/Activities and Outputs

<b>Task 1: Cooperative Agreement Oversight</b>
<p><b><u>b. Project Implementation</u></b>  <b>EPA-funded tasks:</b> The Village will procure and manage Project Manager (PM) and Qualified Environmental Professional (QEP); ACRES, Quarterly Reports, Annual FFR reports and Final grant close out reporting; Access Agreements, comply with Section 106 Historic Preservation Act requirements; Brownfield Advisory Committee (BAC); Attend EPA and state workshops, and national conference; Coordination with QEP and remedial contractor, property owners, and relevant State agencies; Maintain financial records and complete drawdowns; maintaining project files and information repository; Ensure program remains on schedule and budget and in compliance with requirements such as Davis Bacon and BABA. <b>No non-EPA funded resources will be needed.</b></p>
<p><b><u>c. Anticipated Project Schedule:</u></b> Competitive procurement of PM &amp; QEP by 6/27. Other activities to be conducted from 10/1/26-9/30/30. Quarterly Reports submitted within 30 days after the end of each reporting period (Jan/April/July/Oct). Annual FFR submitted by October 30 of each grant year. ACRES updated when assessments are started/completed, new information becomes available and other major milestones. Advisory Committee meetings. Final Closeout report submitted within 90 days after end of cooperative agreement period.</p>
<p><b><u>d. Task/Activity Lead:</u></b> Village will lead procurement tasks. Contracted PM will lead BAC and oversee QEP with Village supervision; QEP will provide technical &amp; programmatic assistance (QRs/ACRES/etc.) and oversee construction activities.</p>
<p><b><u>e. Outputs:</u></b> QEP RFQ. Procure QEP; 16 Quarterly Reports; BAC Meetings; Updates ACRES to track program measures; FFR reports; Closeout Report; Grant drawdown requests; executed access agreements. Attend National Brownfields Conference in 2027 and/or regional and local brownfield events (i.e. BCONE events).</p>
<b>Task 2: Community Outreach &amp; Engagement</b>
<p><b><u>b. Project Implementation</u></b>  <b>EPA-funded tasks:</b> The Village, PM and BAC will provide community outreach and engagement, and focus gathering input from the Target Area residents and community stakeholders. Outreach materials will be prepared for posting throughout the Village, on the Historic Valley Falls website, and on the Village’s Facebook page. Newsletters will be generated to provide updates. The Village will publicize meetings and ensure the Target Area audience is fully engaged, as well as the broader community. The Village will conduct outreach to local and regional press/media outlets. The QEP, in collaboration with the Village and PM, will prepare a Community Involvement Plan (CIP) which will detail the steps to ensure adequate public notice and the opportunity for the community to provide input / feedback on the proposed cleanup/reuse plan and response to comments, etc. Online or paper surveys may be provided to the public to solicit feedback. Reports and other materials will be posted to the project’s website. Public notice of the updated draft ABCA will be provided and presented at a public meeting with a 30-day comment period for members of the community to review and provide their input. Written responses to public comments will be provided and incorporated into the finalized CIP and ABCA. Community partners will provide donated outreach services. <b>No non-EPA grant resources will be needed.</b></p>
<p><b><u>c. Anticipated Project Schedule:</u></b> Community engagement activities would begin Winter/Spring 2026/7 with generation of CIP and continue through Spring/Summer 2030. Outreach anticipated to be conducted at the following project milestones: 1) Spring 2027: Post CIP and present updated draft ABCA. 2) Fall / Winter 2027: Pre-cleanup and solicit feedback from the community regarding proposed redevelopment. 3) Spring/Summer 2028: During Cleanup to discuss status of remediation and reuse planning update. 4) Spring 2029: Post cleanup and next steps.</p>
<p><b><u>d. Task/Activity Lead:</u></b> The PM with assistance from the Village will lead this task. BAC and QEP will be the Village’s partners, providing support with technical expertise and other community outreach assistance. The PM and QEP will review deliverables to ensure compliance with state/federal programmatic requirements.</p>
<p><b><u>e. Outputs:</u></b> Engage the community in the cleanup alternatives analysis and reuse strategy, conduct two (2) public meetings, and prepare meeting minutes, presentation materials, newsletters, flyers, handouts, brochures, surveys. Track participation and distribution statistics.</p>

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### Task 3: Site Specific Activities

**b. Project Implementation**

**EPA-funded tasks:** Complete final ABCA, Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP) and Remedial Action Plan (RAP) for the Site in accordance with EPA, NYSDOS, and NYSDEC program requirements. Conduct community meetings as described in Task 2 to confirm RAP. The selected remedial action(s) will be determined based on metrics such as cost, feasibility, and effectiveness in protecting human health and the environment and consider the reuse plans for the site. Prepare bid specifications and competitively bid cleanup activities, prepare cleanup contracts. EPA grant funds will be used. QEP will be directed to investigate additional Brownfields Assessment funds as necessary when supportable/eligible. **No Non-EPA grant resources will be needed.**

**c. Anticipated Project Schedule:** The ABCA, QAPP and RAP will be completed by Spring 2027, bid specification by Fall 2027 and bidding/contracting in Winter 2027/Spring 2028, Final Completion report by Winter 2028/Spring 2029.

**d. Task/Activity Lead:** QEP will prepare ABCA, QAPP, RAP, and remedial engineering plans & specifications and provide bidding support. PM will review deliverables to ensure compliance state/federal Brownfields requirements. QEP will prepare Final Cleanup Completion Report once site remediation is complete.

**e. Outputs:** Final ABCA, HASP, QAPP, RAP, bidding documents and contracts

### Task 4: Cleanup Activities

**b. Project Implementation**

**EPA-funded tasks:** Oversight of building demolition and hazardous building materials abatement, soils excavation and disposal, and disposal of other wastes. QEP to perform oversight and document activities in the field to ensure cleanup is performed in compliance with the EPA approved ABCA. QEP to perform waste characterization and confirmatory sampling, weekly construction reports, Davis Bacon compliance, and preparation of a Remedial Action Implementation report. Public engagement continues through this phase. QEP will prepare and submit required Remedial Action Plan, Status Reports, and Cleanup Completion reports to the EPA, DOL. The QEP will review construction of the cover system to ensure consistency with the drawings and specifications. **No Non-EPA grant resources will be needed.**

**c. Anticipated Project Schedule:** Cleanup will begin in Spring/Summer 2028 with abatement/demolition and continue through Fall/Winter 2028 with soil remediation (weather dependent). The village is confident all work can be completed within 4 years.

**d. Task/Activity Lead:** QEP will oversee and direct cleanup to be performed by selected remediation contractor. Cleanup contractor will obtain permits and implement specified cleanup tasks with QEP support / oversight. QEP will provide technical oversight, provide documentation for materials required to be disposed of off-site, and document remedial activities for compliance with applicable NYSDEC/EPA standards & requirements. PM and Village will review deliverables to ensure compliance state/federal regulatory and programmatic requirements

**e. Outputs:** weekly construction reports, BABA documentation, Bills of Lading/Manifests, site remediation & restoration, Final Cleanup Completion Report.

**f. Cost Estimates** - **The Village requests a \$4,000,000 cleanup grant to complete the tasks above.** Costs have been estimated based upon past experience and estimates from environmental contractors and in consultation with EPA’s Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance guidelines. Costs were estimated based upon scopes provided under past grants, experience with tasks, and estimates from QEPs. Please note that no fringe, indirect, or equipment costs are requested.

### **Task 1 – Cooperative Agreement Oversight: Total = \$170,400**

**Personnel:** **\$10,900** – Treasurer 300 hours @\$35/hour; Clerk 20 hours @\$20/hour to support program administration for the Village.

**Contractual:**

- **Risk Insurance: \$25,000** (Contracted, if needed). To be negotiated upon cooperative agreement award,
- **Contracted Project Management (PM): \$100,000** The Village will competitively procure contract program management support services (1000hr @ \$100/hour over 4 years)
- **QEP: ~\$34,500** General Cooperative Agreement oversight and programmatic assistance, Quarterly Reports (16), ACRES updates, and grant closeout reporting and assistance (~4.5hrs/mo x ~46mo @ ~\$166.50/hr average).

## NARRATIVE – Village of Valley Falls, Cleanup of old Thompson Mill

<b>Task 2 - Community Outreach: Total = \$ 16,750</b>
<u>Personnel:</u> \$750 – Treasurer 10 hours@ \$35/hr; Clerk 20 hours @ \$20/hour for program support of outreach activities <u>Contractual:</u> - <b>PM \$4,000:</b> PM will oversee and lead all community engagement work (40hrs @ \$100/hr over 4 years) - <b>QEP \$12,000:</b> \$5,000 (\$2,500/mtg x 2 public meetings) + \$4,000 for CIP + \$3,000 for production of outreach materials including survey (~18hrs @ \$167/hr average)
<b>Task 3 – Site Specific Activities: Total= \$143,000</b>
<u>Contractual:</u> <b>QEP ~\$143,000</b> (~841hrs@ \$170/hr average) for: final ABCA, HASP, QAPP, Remediation / Engineering Design Plans & Specifications, including public bidding assistance, and EPA required remedial action plans and cleanup status related documents)
<b>Task 4 – Cleanup Activities Total = \$3,664,000</b>
<u>Contractual –QEP \$165,450</u> Construction administration and oversight, weekly construction reports, Davis Bacon compliance, and preparation of Remedial Action Plan, Status Reports, and Cleanup Completion reports (~973hrs @ \$170/hr average). - <b>Construction \$3,498,550</b> includes \$361,500 (site preparation including mob/demob, erosion controls/catch basin protection, clearing and grubbing, temp fencing, permits and submittals) + \$39,650 (utility disconnect and removal- cut& cap water, sewer, electrical, heating) +\$2,325,500 bulk loading (59,000ft <sup>2</sup> @ \$3 ft <sup>2</sup> demo and load out, 5,950 tons @ \$360/ton, drums/AST removal \$6,500) + \$652,600 soil excavation, sampling and T&D (40 confirmatory sampling @ \$650/ea; 1,300 cy soil excavation \$39/cy; 800tons @ \$195/ton non-AMC T&D; 1,200tons @ \$260/ton AMC T&D; 1200 cy \$52/cy backfill; 35,000 ft <sup>2</sup> @ \$1.30 ft <sup>2</sup> geotextile fabric) = \$3,379,250 + Bonding (\$119,300). Cleanup costs include contingency and factor of safety for inflation as the work is not expected to occur until 2028.
<b>Administrative Costs: Total = \$5,850</b>
<u>Personnel:</u> \$3,350 - Treasurer, 90 hours @ \$35/hour; Clerk 10 hours @ \$20/hour for contract administration tasks. <u>Travel:</u> \$2,000 for National Brownfield Conference Attendance for PM for mileage, hotel, per diem and local travel. <u>Supplies:</u> \$500 for Project related supplies including but not limited to printing and postage

Budget Categories	Task 1: Project Oversight	Task 2: Community Outreach	Task 3: Site Specific Activities	Task 4: Cleanup Activities	Administrative Costs	Total	
Direct Costs	Personnel	\$10,900	\$750			\$3,350	\$15,000
	Fringe Benefits						\$0
	Travel					\$2,000	\$2,000
	Equipment						\$0
	Supplies					\$500	\$500
	Contractual - QEP	\$34,500	\$12,000	\$143,000	\$165,450		\$354,950
	Contractual- Insurance	\$25,000					\$25,000
	Contractual – PM	\$100,000	\$4,000				\$104,000
	Construction				\$3,498,550		\$3,498,550
	Other	\$0	\$0	\$0	\$0	\$0	\$0
<b>Total Direct Costs</b>	<b>\$170,400</b>	<b>\$16,750</b>	<b>\$143,000</b>	<b>\$3,664,000</b>	<b>\$5,850</b>	<b>\$4,000,000</b>	
<b>Indirect Costs</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	<b>\$0</b>	
<b>Total Budget</b>	<b>\$170,400</b>	<b>\$16,750</b>	<b>\$143,000</b>	<b>\$3,664,000</b>	<b>\$5,850</b>	<b>\$4,000,000</b>	

*g. Plan to Measure and Evaluate Environmental Progress and Results* - ACRES, quarterly reporting and monitoring of the Work Plan and project schedule are the primary tools to measure Environmental Results. The system established in the previous EPA contract will continue to be used to achieve project goals, effectively manage schedules and costs to ensure timely and effective use of funds. The Village will track the results by regularly scheduling team progress meetings and producing progress reports. If a project is not on schedule, the reasons will be documented in the quarterly report and a corrective action plan to get the project back on track

## NARRATIVE – Village of Valley Falls, Cleanup of old Thompson Mill

will be implemented. Future leveraging funding to build the park will also be tracked. Long-term outcomes such as the number of jobs created, the number of acres made ready for reuse; the volume of soil remediated will be measured and tracked and entered into ACRES as appropriate.

### (4) Programmatic Capability and Past Performance

#### Programmatic Capability

*a. Organizational Structure / b. Description of Key Staff:* The Village of Valley Falls has the experience, knowledge, resources, and ability to obtain and supervise/control those resources it lacks in house to ensure successful completion of all required aspects of this project and grant by procuring resources strategically. **Project Management (PM) and Qualified Environmental Professional (QEP) oversight** services will be competitively procured by the Village. This is consistent with Village practices and was successfully completed for the **administration of the previous site-specific EPA assessment grant, which was completed on time and on budget.** Project **financial oversight** will be provided by the **Village Treasurer, Michelle Moore**, with progress reports to the Board of Trustees. Annual training on accounting, legal, and regulatory matters for Continuing Education Credits are a requirement of the Treasurer position. **Jay Overocker, the Village's Mayor**, and the Village Board of Trustees will oversee the PM and will also serve as interim or replacement project manager in the event of PM loss. ***This organizational structure focuses on working together successfully and provides this small village with the capacity to successfully carry out and manage the programmatic, administrative, and financial requirements of the projects and grant.***

*b. Acquiring Additional Resources:* **Upon award, the Village will initiate a Request for Proposals (RFP) process to competitively procure a PM and QEP following EPA and federal guidelines.** The Village will use a **QEP** overseen by the Village Board of Trustees and PM to assist with outreach and cooperative agreement oversight activities and to accomplish the assessment and cleanup and reuse planning activities at Priority Sites. The QEP will be competitively procured and be contractually responsible for ensuring compliance with all applicable federal and state requirements of the project and the funding sources, particularly those related to labor practices and local hiring. This will explicitly include reporting, community outreach, and safety tasks. Any **legal services or insurance** required, will also be arranged through a competitive contract, as the Village does not employ an attorney. This is consistent with past practice.

#### Past Performance and Accomplishments

##### *d. Current Has or Previously Received an EPA Brownfields Grant*

1. Accomplishments: Valley Falls received a \$200,000 EPA Brownfields Site Specific Assessment grant (BF-96267417-0) in 2017 that was 100% expended and closed by the EPA on July 21, 2021. These grant funds allowed the Village of Valley Falls to complete All Appropriate Inquiries (AAI) and a Phase I ESA Report prior to attaining site ownership of the Thompson Mill after foreclosure on the tax delinquent owner; generated a SAP, HASP, QAPP and a Phase II ESA report for the mill site, which were all reviewed and approved by EPA. EPA and the QEP identified remaining data gaps following the Phase II ESA, due to the requirement to demolish the building in order to complete an adequate assessment of the property; The site was fenced and warning signs were posted to prevent potential exposure to hazardous materials, as well as the structurally unsound building, and prohibit unauthorized access to the site; A site-specific hazardous waste variance was applied for and approved from the NYSDOL; The Village procured legal services to investigate prior owner liability. Conceptual site reuse plans were generated and updated based on community input. Community engagement and outreach on progress on site activities occurred throughout the duration of the project, particularly at major project milestones.

2. Compliance with Grant Requirements: The Village complied with the work plan, schedule and terms and conditions of the EPA grant, with one request for an extension due to a delay relating to the COVID-19 pandemic. Quarterly reports were submitted on time and were complete. ACRES database is up to date including the findings of the site-specific assessment activities. All grant funds were fully expended.

## **THRESHOLD CRITERIA DOCUMENTATION –Village of Valley Falls – Old Thompson Mill Cleanup**

### 1. Applicant Eligibility

- a) The Village of Valley Falls NY is a general-purpose unit of government, incorporated in 1904.
- b) The Village of Valley Falls is NOT exempt from Federal taxation under section 501(c)(4) of the Internal Revenue Code. The Village does NOT engage in lobbying activities with the Federal government or with other organizations.

### 2. Previously Awarded Cleanup Grants

The Village of Valley Falls has NOT received funding from a previously awarded EPA Brownfields Cleanup Grant for the Old Thompson Mill site.

### 3. Expenditure of Existing Multipurpose Grant Funds

The Village of Valley Falls does NOT have an open EPA Brownfields Multipurpose Grant.

### 4. Site Ownership

The Village of Valley Falls is the sole owner of the Old Thompson Mill complex, contained in four tax parcels/sites (22.16-3-2.1, 22.16-3-1.2, 22-9-2.13 and 22.16-3-1.1) in Valley Falls, NY 12185 identified as 273 Poplar Street. This deed was conveyed to the Village by Rensselaer County for \$0.00 on 5/6/2019 in Instruction #2018-538376 after legal foreclosure on the tax-delinquent owner James L. Bent, Jr.

### 5. Basic Site Information

- a) Name of Site: **The Old Thompson Mill site.**
- b) Address of Site: **273 Poplar Street, Valley Falls, NY 12185.**

### 6. Status and History of Contamination at the Site

- a.) *Whether the site is contaminated by hazardous substances or petroleum.*

The site is contaminated by hazardous substances as further detailed in item c of this section.

- b.) *Operational History & Current Use:*

The earliest identified development of the Site was part of a textile mill complex in the late 1800's. The various mills identified historically on-Site included a knitting mill, grist mill, flax mill, and pulp mill, that were operated by James Thompson & Co, Inc. The various mill operations including machining, washing, preparing, knitting, finishing, storage, dyeing, drying, spinning, coal storage, and pulp, yarn, and twine manufacturing occurred through the 1980s.

The Site is currently derelict with only one remaining approximately 13,000 sq. ft., three-story brick former mill building, that is condemned due to a massive arson fire in 2009 and it continues to deteriorate. Site access is restricted, including fencing with warning signs about the presence of asbestos and PCBs. Several former mill building foundations are visible along with rubble from their collapsed or demolished structures.

A recent structural analysis has deemed the remaining building unsafe to access. Investigational activities around the building can't be safely performed within the 'fall zone'

## THRESHOLD CRITERIA DOCUMENTATION –Village of Valley Falls – Old Thompson Mill Cleanup

of the building or the building footprint. Future additional investigations closer to the building and/or below the foundation, where potential impacts are expected, require the structure to be demolished prior to investigation activities being performed.

### *c.) Environmental Concerns:*

The complex is adjacent to both youth recreational fields and residences, separated by a rail line. **The dilapidated building containing the hazardous materials is located along the banks of the Hoosic River, and the Old Thompson Mill Site is in the federal floodplain.** The former operations of the Site as a mill, and the major fire at the Site likely resulted in the release of multiple contaminants including incomplete combustion by products (polycyclic aromatic hydrocarbons, or PAHs), oils, solvents and/or metals. In addition, releases of hazardous building materials may have occurred during the fire and subsequent building collapse. These materials could include polycyclic chlorinated biphenyls (PCBs), lead and asbestos. Since petroleum storage and heating sources were co-located with other mill operations, and because of the fire, there may be residual petroleum compounds co-mingled with hazardous substances at this site. There is concern of the hazardous materials and/or other contaminants impacting nearby and downstream residences, site visitors/trespassers, the Hoosic River and wildlife. The condition of the condemned building is also a safety concern for those that come onsite.

### *d) How Site Became Contaminated & Nature and Extent:*

Former mill activities included fabric dyeing and other manufacturing and milling operations. A combination of the former mill operations with the major fire at the Site likely resulted in the release of multiple contaminants. In addition, portions of the site have been used for illegal solid waste dumping over decades. Known contamination identified during a 2020 Phase II ESA include heavy metals (chromium, lead, mercury, and others), Semi-Volatile Organic Compounds (SVOCs), Polychlorinated Biphenyls (PCBs), Lead Based Paint (LBP) and asbestos in building materials. Impacted building debris is in soils around the former mill facility and the adjacent privately owned Valley Falls Hydro parcel. Continued building deterioration and collapses after the fire in 2009 have exacerbated the extent and comingling of contaminants and significantly damaged the buildings, which are now a magnet for vandalism and crime, and a significant safety hazard.

## 7. Brownfield Site Definition

The Valley Falls old Thompson Mill Site is **NOT**:

- a) listed or proposed for listing on the National Priorities List;
- b) subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and
- c) subject to the jurisdiction, custody or control of the US government.

The site meets the definition of a brownfield site.

## **THRESHOLD CRITERIA DOCUMENTATION –Village of Valley Falls – Old Thompson Mill Cleanup**

### 8. Environmental Assessment Required for Cleanup Grant Applications

The following ASTM International (ASTM) Phase II Environmental Site Assessment (ESA) equivalent environmental assessment report has been completed for the Site:

- Phase II Environmental Site Assessment Report, Former Thompson Mill, dated July 2020

Weston & Sampson, on behalf of the Village of Valley Falls (Village), prepared the Phase II ESA Report in accordance with ASTM requirements for the Site under a Cooperative Agreement between the Village and the EPA through a Brownfields Assessment Grant (96267417-0). The intent of the Phase II ESA was to investigate selected Recognized Environmental Conditions (RECs) identified during the Phase I ESA and to identify potential contaminants of concern (COCs), likely source(s), and the potential extent of contamination in affected media. In addition to evaluating the RECs, Weston & Sampson evaluated the structural condition of the partially collapsed mill building. A secondary goal of the assessment was to evaluate if archaeological artifacts were present.

In October 2019, Weston & Sampson excavated twelve test pits at the Site as part of the Phase II investigation. Soil samples were collected within each test pit, and analyzed for Volatile Organic Compounds (VOCs), SVOCs, Metals, PCBs and Pesticides/Herbicides. During the excavation process, archaeological monitoring was conducted to observe and identify any potential archaeologically significant findings. A Hazardous Building Materials (HBM) assessment was also completed to identify the presence of Asbestos Containing Material (ACMs), PCB containing material and LBP in building materials.

Weston & Sampson concluded that the building structure is unsafe. SVOCs and metals were detected in selected test pits. The areas within the building footprint could not be accessed due to safety concerns. The archaeological evaluation did not identify archaeological artifacts; however, they did observe paleosols that have the potential to contain artifacts in other areas of the site, which could impact site redevelopment. The HBM assessment identified ACMs, PCBs and LBPs in building materials and in rubble.

### 9. Site Characterization

- a) Not Applicable.
- b) Not Applicable.
- c)
  - i.) At this time, the old Thompson Mill site is NOT eligible to be enrolled in the NYS voluntary response program administered by NYS Department of Environmental Conservation (NYSDEC). The attached letter explains that Hazardous Building Materials are not included in the NYSDEC Brownfield Cleanup Program and are regulated by the NYS Department of Labor (DOL). The NYS DOL has previously approved a Variance (20-1313) for bulk removal of Hazardous Building Materials based on the completed environmental assessment at the site that has expired due to lack of funding. It should be noted that confirmation samples collected within the building footprint after cleanup is completed, may indicate that the site is eligible for the NYSDEC voluntary

## THRESHOLD CRITERIA DOCUMENTATION –Village of Valley Falls – Old Thompson Mill Cleanup

cleanup program depending on analytical results. However, this can only be determined once the building is demolished, and the hazardous materials have been removed so that the building footprint can be safely accessed for assessment.

- ii.) Weston and Sampson, an Environmental Professional as defined in 40CFR§312.10, has certified that there is a sufficient level of site characterization from the environmental site assessment performed to date to begin work on the site.

### 10. Enforcement or Other Actions

There are NO known ongoing or anticipated environmental enforcement or other actions related to the Old Thompson Mill site for which this Brownfields Cleanup Grant funding is sought.

### 11. Sites Requiring a Property-Specific Determination

The Old Thompson Mill site does NOT need a Property-Specific Determination.

### 12. Threshold Criteria Related to CERCLA/Petroleum Liability

#### a) *Property Ownership Eligibility – Hazardous Substance Sites*

##### **i. Exemptions to CERCLA Liability.**

##### (3) Property Acquired Under Certain Circumstances by Units of State & Local Government

###### (a) *Describe in detail the circumstances under which the property was acquired.*

The property was acquired by Rensselaer County through foreclosure based on tax delinquency and abandonment. The deed was transferred, as an inter-governmental transfer through uniquely governmental functions, to the Village of Valley Falls. Since the Village is a micro-community, the County had to facilitate the tax title taking and transfer of the property to the Village because of the Village's extremely limited resources.

###### (b) *Provide the date on which the property was acquired.*

The property foreclosure proceeding was filed with the Rensselaer County Clerk on August 21, 2018 and took six months to complete. The Village obtained property access and completed due diligence activities, including conducting an ASTM E1527-13 compliant Phase I ESA and All Appropriate Inquiries (under an EPA Assessment grant) on January 3, 2019. Property transfer from the County to the Village occurred on **May 9, 2019**.

###### (c) *Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.*

All disposal of hazardous substances at the site occurred prior to the Village of Valley Falls acquiring the property.

###### (d) *Affirm that you have not caused or contributed to any release of hazardous substances at the site.*

The Village of Valley Falls has NOT caused or contributed to any release of hazardous substances at the site. The Village has taken reasonable steps to address any releases including preventing exposure to hazardous substances at the site. The Village has restricting access to the site by installing chain link fencing and posting warning signs that asbestos and PCB materials are present on site.

## THRESHOLD CRITERIA DOCUMENTATION –Village of Valley Falls – Old Thompson Mill Cleanup

(e) *Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.*

The Village of Valley Falls has NOT, at any time, arranged for the disposal of hazardous substances at the site, or transported hazardous substances to the site.

*iv. Sites with hazardous building material that is not released into the environment .*

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

### 13. Cleanup Authority and Oversight Structure

- a) The Old Thompson mill site is not eligible for the NYS DEC Brownfields Cleanup Program as cleanup of hazardous materials including ACMs, PCB material and LBP fall outside of the jurisdiction of that program. The cleanup of those types of hazardous material falls under the jurisdiction of the NYSDOL. All NYSDOL regulations and variance procedures will be followed. The Village of Valley Falls will engage competitively procured a Qualified Environmental Professional (QEP) to provide technical expertise to conduct, manage and oversee the cleanup activities. These services will be solicited using competitive procurement practices and in accordance with all federal (2 CFR §200.317 through 200.327) and state requirements. The Village has established procedures which include seeking statements of qualifications and cost proposals. Professionals with previous EPA Brownfields experience will be encouraged to compete. This technical expertise will be in place prior to beginning any cleanup activities. The QEP will comply with and submit all required state and federal requirements to ensure that the cleanup project protects human health and the environment. The Site will be monitored during cleanup activities to ensure that off-site migration of contaminants does not occur as a result of remedial activities. The QEP will also develop necessary design and/or institutional control plans, as needed. NYSDEC may have authority over some of this remedial work. All reports will be publicly available at the Village Hall, the Village Library as well as a dedicated website.
- b) There are three adjacent properties that may be impacted by the cleanup response activities:
- *CSX Railroad:* The Village of Valley Falls will work with the railroad to develop and execute an acceptable access agreement for completing any necessary activities with minimal impact to railroad operations, while also addressing additional safety protocols during clean-up (i.e. flagging services).
  - *The Valley Falls Hydro property* (dam) and associated infrastructure (National Grid substation) may be impacted by the noise and traffic of cleanup activities, and all work will be coordinated with the plant manager and owners. Property access is not anticipated.
  - *The Village of Valley Falls Sewage Treatment Plant* is co-located on the property and adjacent to the available private railroad crossing that will be used for cleanup mobilization. Coordination to ensure lack of disruption to plant operations will be done. Property access to the plant is not anticipated. If access becomes necessary for the Valley Falls Hydro or Sewage Treatment Plant properties, or other properties, the Village of Valley Falls will work with the property owners to develop and execute an acceptable access agreement for completing any necessary activities.

## THRESHOLD CRITERIA DOCUMENTATION –Village of Valley Falls – Old Thompson Mill Cleanup

### 14. Community Notification

The Village of Valley Falls provided the community with notice of its intent to apply for an EPA Brownfields Cleanup Grant, including a notice of a public meeting, and request for comments on the draft application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) on January 8, 2026. The notification also invited the community to comment on the draft ABCA and application. It was posted at the Valley Falls Library, the Post Office, Community Hall, and outside the fire house. Articles appeared in the two weekly papers serving the area, the Express and the Eagle (see attached).

#### a) *Draft Analysis of Brownfield Cleanup Alternatives*

On January 12, 2026, the attached Draft Analysis of Brownfield Cleanup Alternatives (ABCA) was made available for public review at the Valley Falls Free Library (42 State St) and at the Village Hall (11 Charles Street). It was also posted on <https://www.historicvalleyfalls.com> with an ability to download along with a copy of the draft grant application. **119 visits to the website and button clicks on the document were recorded in the period 1/10 to 1/20/2026.**

#### b) *Community Notification Ad*

The community notification ad and screenshots of the Facebook page posting the express article and the [www.historicvalleyfalls.com](http://www.historicvalleyfalls.com) website posting are attached. The ad was published in The Express weekly local newspaper on January 8, 2026, which is more than 14 calendar days prior to the application submission date of January 28, 2026. The second weekly paper serving the area, the Eagle, also published an article on the intent to apply.

#### c) *Public Meeting*

The Village of Valley Falls held an in-person Public Information Meeting on Thursday, January 15, 2026 at 7:30 PM at the Valley Falls Community Hall, to present the Draft ABCA and to describe the project application and seek public input. This was advertised using a newspaper ad, the Village Facebook page, and the HistoricValleyFalls.com website. Four people attended. The response to the proposed application can be characterized as “It’s about time!”. All public comments were reviewed and appropriately addressed. A detailed comment summary with the Villages responses, meeting notes, and the meeting sign-in sheet are attached.

#### d) *Submission of Community Notification Documents*

The following Community Notification Documents are included as attachments:

- A copy of the Draft ABCA
- Community Legal Notice Ad from the Express Newspaper, January 8, 2026
- Article, Express Newspaper January 8, 2026
- Article, Eagle Newspaper, January 15, 2026
- Screenshot Facebook Meeting Express Article, January 21, 2026 - **96 views, 34 shares**
- Screenshot HistoricValleyFalls.com Meeting Notice and online access to the ABCA, January 10, 2026– **119 views and button clicks through January 21, 2026**
- Public Meeting notes/summary from public meeting
- Public Meeting participant list/sign-in sheet
- A summary of public comments received
- The Village of Valley Falls response to public comments.

## THRESHOLD CRITERIA DOCUMENTATION –Village of Valley Falls – Old Thompson Mill Cleanup

### 15. Contractors and Named Subrecipients:

- *Contractors:*  
Not applicable. Contractor(s) will be selected in compliance with the fair and open competition requirements in 2 CFR Part 200 and 2 CFR Part 1500 subsequent to award. The Village of Valley Falls will follow public procurement best practices including 40 CFR Part 33, EPA’s Best Practice Guide for Procuring Services, Supplies, and Equipment Under EPA Assistance Agreements and Brownfields Grants: Guidance on Competitively Procuring a Contractor, New York public procurement law, and any additional applicable guidelines and ordinances, including equitable procurement practices.
- *Named Subrecipients:*  
Not applicable.

### Attachments

- Letter dated January 7, 2026 from NYS Department of Environmental Conservation, regarding eligibility for NYS Brownfield Funding
- A copy of the Draft ABCA
- Community Legal Notice Ad from the Express Newspaper, January 8, 2026
- Express Article – January 8, 2026
- Eagle Article – January 15, 2026
- Screenshot Facebook Express Article, January 21, 2026 - 96 views, 34 shares
- Screenshot HistoricValleyFalls.com Meeting Notice and online access to the ABCA, January 10, 2026
- Public Meeting notes/summary from public meeting
- Public Meeting participant list/sign-in sheet
- A summary of public comments received
- The Village of Valley Falls response to public comments.

**THRESHOLD  
CRITERIA  
ATTACHMENTS –  
Village of Valley Falls  
– Old Thompson Mill  
Cleanup**



**Department of  
Environmental  
Conservation**

**KATHY HOCHUL**  
Governor

**AMANDA LEFTON**  
Commissioner

January 7, 2026

Village of Valley Falls  
Attn: Kristina Younger  
PO Box 157  
Vally Falls, NY 12185

Dear Ms. Younger:

The New York State Department of Environmental Conservation (NYSDEC) has been informed that the Village of Valley Falls plans to conduct the cleanup of a brownfield site and is applying for an FY26 EPA Brownfields Cleanup Grant.

The Village of Valley Falls reportedly has developed an application requesting site-specific federal Brownfields Cleanup funding for the old Thompson Mill site located at 273 Poplar Street in Valley Falls New York.

The NYSDEC has determined that the old Thompson Mill site is not eligible to be enrolled in the NYSDEC Brownfield Cleanup Program (BCP) based on the review of information provided by the Village of Valley Falls, including a Limited Phase 2 Environmental Site Assessment (ESA). The ESA included sampling data that was limited in scope due to the onsite old Thompson Mill building containing asbestos and/or other hazardous building materials, and the questionable safety of the area close to the onsite building. The primary 'contaminants of interest' at the old Thompson Mill site are asbestos and/or other building materials, based on the NYSDEC's data review, which would not make the site eligible for the NYSDEC BCP remedial program at this time.

For any questions regarding this letter, please contact me at 518-402-9729 or Susan Van Patten at 518-402-8240.

Sincerely,

Karen Diligent  
Director, Bureau of Program Management

ec: N. Azzam, USEPA Region 2  
S. Mitchell, USEPA Region 2  
R. Mustico, DEC Albany  
J. Haugh, DEC Region 4