Office of the Town Administrator
Town of Montague
One Avenue A
Turners Falls, MA 01376
Phone (413) 863-3200 ext. 108

FY24 EPA Brownfield Grant – THRESHOLD CRITERIA

Project Title: **Strathmore Mill Cleanup**
Applicant: **Town of Montague, MA**

1. Applicant Eligibility
The applicant is the Town of Montague, a municipality in the Commonwealth of Massachusetts.

2. Previously Awarded Cleanup Grants
The Town of Montague has not previously received a Cleanup grant for this Site.

3. Expenditure of Existing Multipurpose Grant funds
This Criterion does not apply. The town of Montague has not received a Multi-purpose Grant.

4. Site Ownership
The Town of Montague is currently the sole owner of the property, which consists of Strathmore Mill Buildings 1-9 on approximately 1.3 acres of land. The property is one of two parcels that compromise the Strathmore Mill Complex. The property was acquired by tax title foreclosure on February 19, 2010. The Deed can be found in the Franklin County Registry of Deeds Book 5494 Page 83 and the Judgment in the tax lien case is found in Book 1826 Page 16.

5. Basic Site Information
A) Name of the Site: "Strathmore Mill"
B) Address :20 Canal Road Turners Falls MA 01376
C) Current owner: Town of Montague (Town)
D) Date acquired property: Feb 19, 2010

6. Status and History of Contamination at the Site
A) The site is contaminated with hazardous substances associated with building materials in the 9 building complex
B) The site is former paper mill. The building is currently vacant and blighted. The Strathmore Mill complex was constructed between 1874 and 1970 and consists of 9 contiguous buildings on 1.3 acres along the Connecticut River, Historically, mill operations included machining, stamping, forging, grinding, finishing, pulping, cutting, and bleaching. The complex has over 200,000 square feet in floor area. The site is sandwiched on a narrow strip of land between a former coal generation power plant and an active paper mill.
C) A January 2004 Phase II and Response Action Outcome which included soil and groundwater testing, concluded no further remediation is required. The contamination consists of hazardous substances and is present in the building structures and boilers.
D) An April 2005 Hazardous Materials Survey report documented a significant number of materials throughout the mill buildings that were classified as asbestos containing

materials. This report was updated in 2015. This identified over 4,000 linear feet of TSI Piping, 130 cubic yards of transite components, 20,000 square feet of transite panels, 4 industrial boilers, and 1,000 square feet of floor tile, window glazing, boiler seams, boiler gaskets, tar covered insulation. As part of the survey, the following hazardous materials were catalogued: light fixtures (with PCB ballasts), hydraulic oil, household wastes, oils, paints, cleaners, bird guano, lead containing paints.

E) Building A is approximately 135,000 square feet and the remainder of the mill is approximately 200,000 square feet in total.

F) The various assessments have detected hazardous building materials such as asbestos containing materials (ACM), Lead-based paint (LBP) and Polychlorinated Biphenyls (PCBs) in building materials. In addition, heavy metals such as arsenic and lead, polycyclic aromatic hydrocarbons (PAHs) and PCBs have been detected in soil. Additionally, two RTNs for 20 Canal Road list petroleum these may have been from spills, overfills and were addressed and closed out. The arsenic, PAHs and lead is associated with historic fill as well as potential releases at the mill through various industrial uses over its lifespan.

7. Brownfields Site Definition

A) The property is not listed or proposed for listing as a Superfund Site

B) The property is not subject to unilateral administrative orders, court orders, administrative order on consent, or judicial consent decree issued by CERCLA

C) The property is not subject to the jurisdiction, custody, or control of the US government

8. Environmental Assessment Required for Cleanup Proposals

Numerous past studies and environmental investigations of the Strathmore Mill have been conducted by various engineers, environmental consultants, planners since 2005. The results of these efforts are documents and summarized in reports which include:

- Phase I Environmental Site Assessment - Tighe + Bond (2004).
- Phase II Environmental Site Assessment and Response Action Outcome- Tighe + Bond (2004).
- Hazardous Materials Survey (2005)- Tighe + Bond. Updated 2015 by Tighe + Bond
- Phase I Environmental Site Assessment (updated 2013)- Tighe+Bond
- Strathmore Feasibility Study (2005) Finegold Alexander + Associates Inc
- Site Development Assessment (2008) Fuss & O'Neill

9. Site Characterization

Please see the attached letter from the Massachusetts Department of Environmental Protection (MassDEP) indicating that this Site is eligible for enrollment into the state cleanup program, known as the Massachusetts contingency Plan (MCP). There is currently one Release Tracking Numbers (RTN) for this Site and two for the Site Address:

- RTN 1-13843 – 20 Canal Road - Fuel Oil – limited amount
- RTN 1-15175 – Strathmore Mill - arsenic
- RTN 1-16634 – 20 Canal road - Oil

Most of these sites were closed under current site conditions, however, for future redevelopment the residual contaminants would need to be addressed. Based on the contaminants detected at the site, plus the presence of ACM, the cleanup could either be conducted under one of these RTNs or can enroll and get a new RTN under the MCP.

For the contaminants there appears to be sufficient data to support cleanup. Because the work needs to be publicly bid, some sampling would be conducted to support and fine tune quantities int eh design. In addition, following cleanup, post remediation data would also be required.

For this site the predominant contaminants of concern include heavy metals, PCBs and PAHs plus building materials such as ACM and LBP. It is likely that some petroleum contamination could still reside and be mixed but petroleum is not the predominant contaminant as it was cleaned up previously as part of earlier MCP response actions.

10. Enforcement and Other Actions

There are no enforcement or other actions on this site.

11. Sites requiring a Property-Specific Determination

The property does not require a property specific determination because the owner has affirmed as such under 3.c. that the property is eligible for funding. In addition the site:

- Is **not** subject to planned or ongoing removal actions under CERCLA
- Has **not** been issued administrative, consent or judicial orders under RCRA, FWPCA, TSCA or SDWA.
- Is **not** subject to a RCRA corrective action.
- Is **not** required to submit a RCRA closure notification and I not subject to RCRA closure requirements.
- The presence of PCBs are **not** subject to TSCA, and
- The Site has **not** received funds from the LUST Trust fund.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

As discussed above the petroleum previously detected is co-mingled and is not the driver for remediation at this site.

(A) Property Ownership Eligibility- Hazardous Substances Sites

(1) CERCLA 107 Liability- The Town of Montague affirms that it is not liable for the contamination at the site:

- The Town has not used the site for the disposal of contaminated or hazardous materials and is seeking assistance to clean up the existing hazardous materials.
- The Town was not an owner or operator at the time of the disposal
- The Town did not arrange for treatment or disposal
- The Town did not accept hazardous substances for transport to disposal or treatment

(2) Information on Liability and Defenses/Protections

(A) Information on Property Acquisition

The Town acquired fee simple ownership in 1.9 acres which included the Strathmore Mill Complex through foreclosure of real property taxes on February 19, 2010. The previous owner was Swift River Strathmore Development, LLC.

(B) Timing and/or Contribution Toward Hazardous Substances Disposal

Hazardous Substances were present on the Property prior to acquisition by the Town of Montague. The Town in no way caused or contributed to the hazardous substances on the property. The Town was involved in a 2011 ACM cleanup of collapsed Building #10. The cleanup project was funded by ad EPA Subgrant from the Franklin County Regional Brownfields Program and thus was overseen by a Qualified Environmental Professional.

(C) Pre-Purchase Inquiry

The Town conducted the following pre-purchase inquires:

- Phase I Environmental Site Assessment (2004) by Tighe + Bond
- Phase II Environmental Site Assessment and Response Action Outcome by Tighe + Bond (2004).
- Hazardous Materials Survey (2005)- Tighe + Bond. Updated 2015 by Tighe + Bond

(D) Post-Acquisition Uses

The Site has not changed since the acquisition and remains under the ownership of the Town of Montague. The mill has remained vacant, secured, and unused. Copies of the Executive summaries from these reports is provided in the attachments. The full reports are 1000s of pages and are available on request.

(E) Continuing Obligations

The Town of Montague has boarded up Strathmore Mill in order to restrict potential access to trespassers or vagrants and direct exposures to asbestos and other chemical hazards present in the building. Security measures are in place to prevent the potential for a release or potential exposure to the public. Currently, the contamination is contained and is not expected to be released to the environment.

However, potential risk to human health, public welfare, safety and the environment exists should a release of hazardous materials (asbestos) occur as a result of a fire. This risk is very real as evidenced by the occurrence of a 2007 arson fire that resulted in co-mingles asbestos debris cleaned up by the Town in 2011. The Town confirms its commitment to comply with all land use restrictions and institutional controls, assist and cooperate with those performing cleanup including access; comply with all information requests; and provide all legally required notices.

12.b – Petroleum Eligibility – this site is a hazardous materials site. Any petroleum is a minor amount and is co-mingled. Petroleum is not the driver for risk at the site and is not considered a contaminant of concern. Therefore a petroleum eligibility is not required for this site.

13. Cleanup Authority and Oversight Structure

(A) Describe how you will oversee the cleanup

The Town will engage the assistance of a Qualified Environmental Professional (QEP) to oversee the cleanup and a certified asbestos inspector. This professional will be in place prior to the start of the cleanup and will be procured using the Commonwealth's public procurement process which is an open, competitive bidding process. Cleanup will be conducted under the direction and/or in coordination with a Massachusetts Licensed Site Professional (LSP), as required under MGL 21E and the Massachusetts Contingency Plan (MCP), 310 CMR 40.0000. the LSP chosen will develop design documents for public procurement of a remediation contractor also specializing in hazardous building material abatement, demolition, and selective deconstruction.

14. Community Notification

A grant informational session was duly posted with the Town Clerk and the official Town Website on October 26, 2023. The notice ran in the Montague Reporter on October 26, 2023. The draft grant application was publicly available for review on the town website. The information session was hosted by the Montague Selectboard on November 6, 2023. The meeting was facilitated by the Assistant Town Administrator Walter Ramsey, AICP. The session was filmed by Montague Community Television and is available on MCTV's Vimeo.com account. A copy of the public meeting advertisement along with and meeting summary are attached to the application.

15. Contractors and named subrecipients

The Town of Montague has not procured a contractor for this work (QEP or remediation contractor), nor any named subrecipients, therefore this section is not applicable.

ATTACHMENT A

State Letter of Acknowledgment

Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection
Western Regional Office • 436 Dwight Street, Springfield MA 01103 • 413-784-1100

Maura T. Healey
Governor

Kimberley Driscoll
Lieutenant Governor

Rebecca L. Tepper
Secretary

Bonnie Heiple
Commissioner

October 30, 2023

U.S. EPA New England
Attn: Frank Gardner
5 Post Office Square, Suite 100
Mail Code: OSRR7-2
Boston, Massachusetts 02109-3912

RE: STATE LETTER OF ACKNOWLEDGEMENT
Town of Montague, EPA Brownfields Cleanup Grant,
Strathmore Mill, 20 Canal Road, Turners Falls

Dear Mr. Gardner:

I am writing to support the application submitted by the Town of Montague (the "Town") under the Fiscal Year 2024, U.S. Environmental Protection Agency (EPA) Brownfield Assessment Grant Program. Funding from EPA will assist the Town in the cleanup of asbestos containing materials and other hazardous materials at the municipally-owned Strathmore Mill, located at 20 Canal Road, in Turners Falls, Massachusetts. The mill is currently dilapidated causing concern to public health and safety. In addition, it also represents a direct threat to an Environmental Justice population as well as the natural resources of the Connecticut River. With EPA funding, the Town's vision to restore the riparian area and create riverfront open space may be achievable.

The Massachusetts Department of Environmental Protection (MassDEP) Western Regional Office provides technical support to Brownfield project proponents when regulatory issues arise. If this proposal is selected, MassDEP will work with our State and Federal partners to support the Town of Montague to help make this project a success. We greatly appreciate EPA's continued support of Brownfield efforts in Massachusetts.

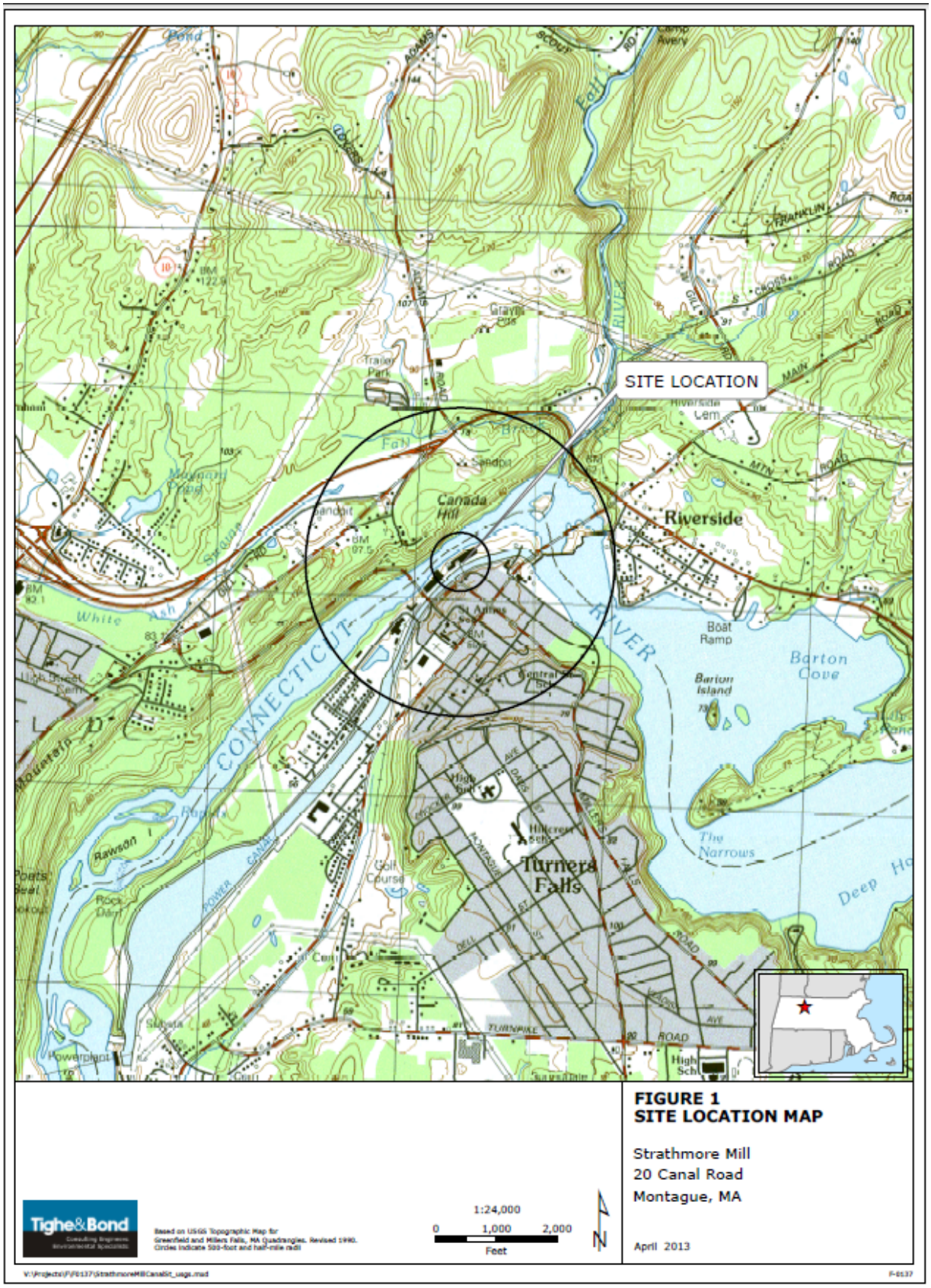
Sincerely,

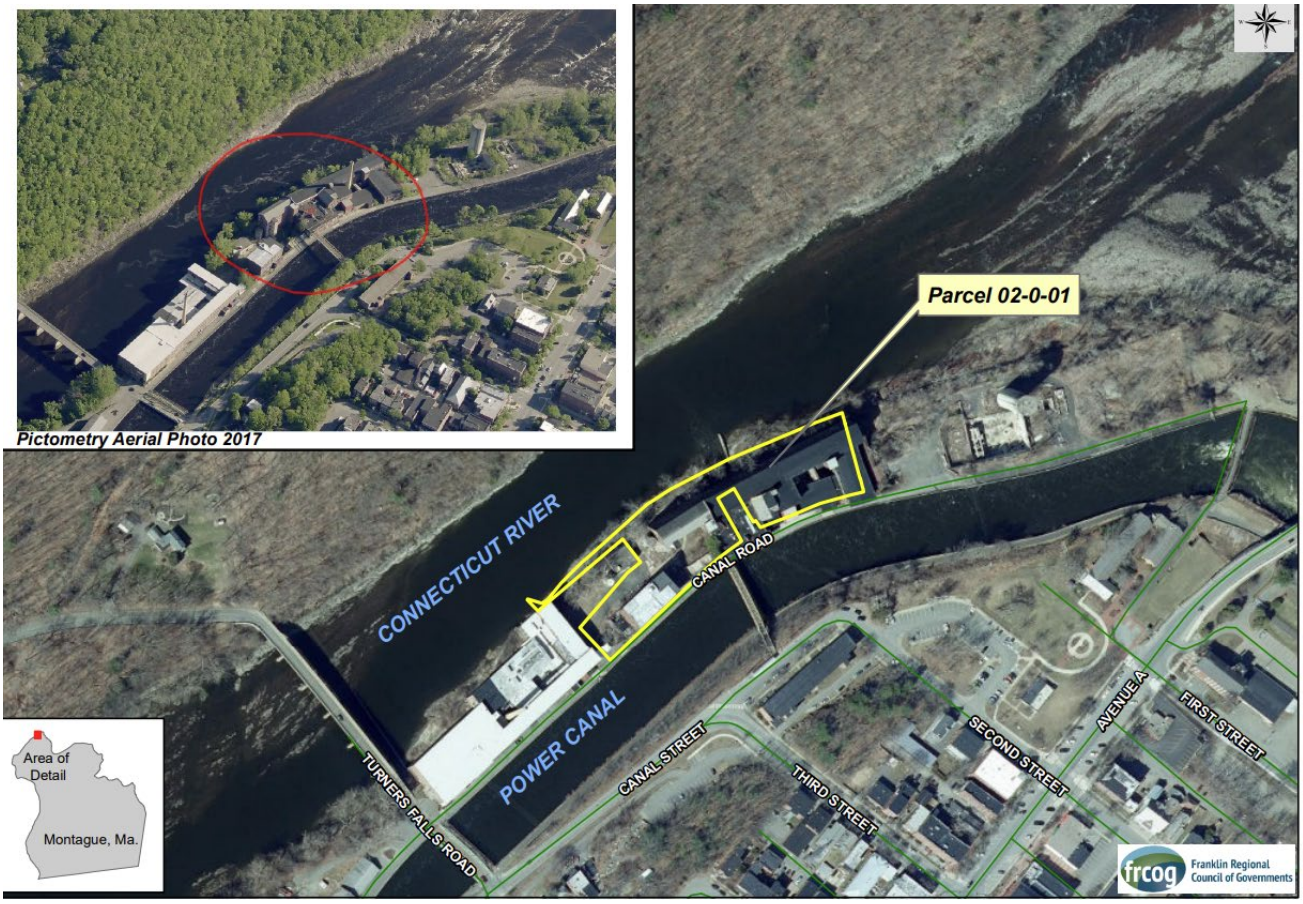
Michael J. Gorski
Regional Director

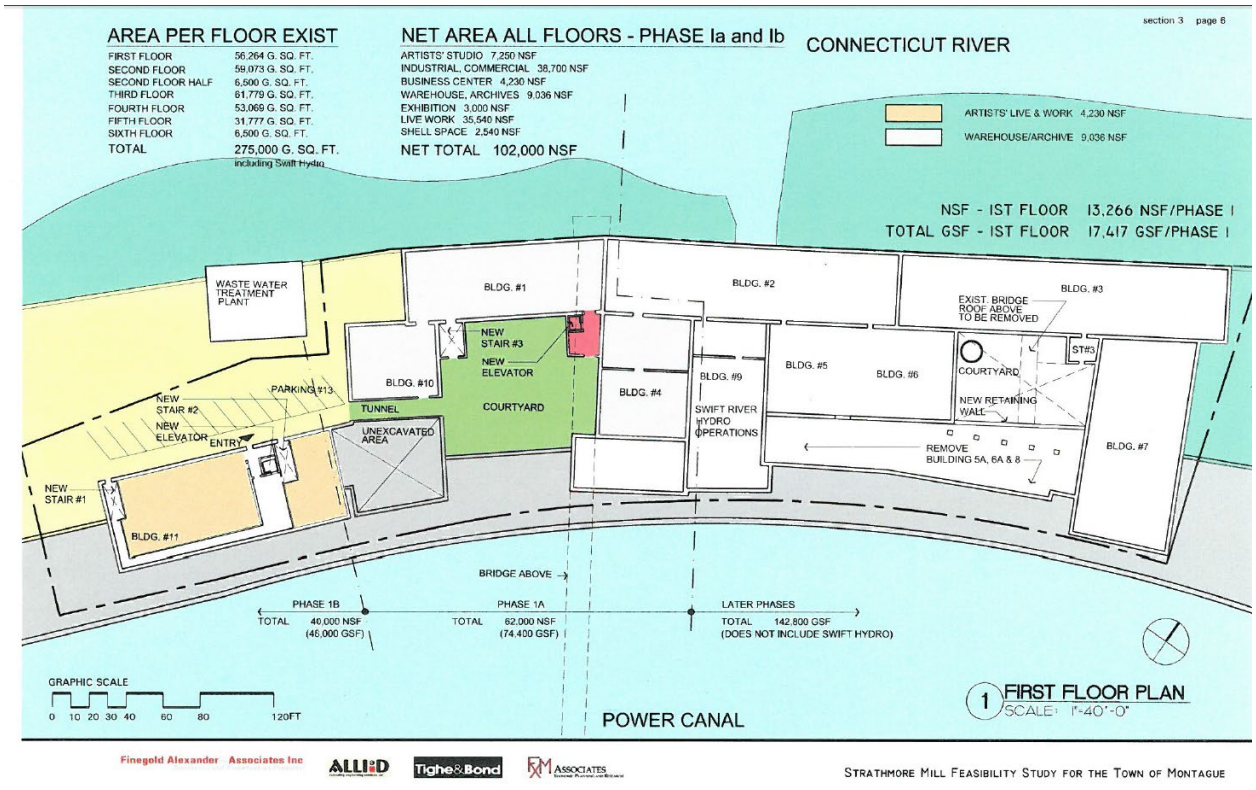
This information is available in alternate format. Please contact Melixza Esenyie at 617-626-1282.
TTY# MassRelay Service 1-800-439-2370

ATTACHMENT B

Project Area Maps


SITE LOCATION
Riverside
Canada Hill
Turners Falls
Barton Cove
Barton Island
Boat Ramp
The Narrows
CONNECTICUT RIVER
Golf Course
Powerplant
Tighe&Bond
Based on USGS Topographic Map for Greenfield and Millers Falls, MA Quadrangles. Revised 1990. Circles indicate 500-foot and half-mile radii
1:24,000
0 1,000 2,000
Feet
N
FIGURE 1
SITE LOCATION MAP
Strathmore Mill
20 Canal Road
Montague, MA
April 2013


Pictometry Aerial Photo 2017
Parcel 02-0-01
CONNECTICUT RIVER
CANAL ROAD
POWER CANAL
CANAL STREET
THIRD STREET
SECOND STREET
AVENUE A
FIRST STREET
TURNERS FALLS ROAD
Area of Detail
Montague, Ma.
frcog
Franklin Regional Council of Governments


AREA PER FLOOR EXIST
FIRST FLOOR 56,264 G. SQ. FT.
SECOND FLOOR 59,073 G. SQ. FT.
SECOND FLOOR HALF 6,500 G. SQ. FT.
THIRD FLOOR 61,779 G. SQ. FT.
FOURTH FLOOR 53,069 G. SQ. FT.
FIFTH FLOOR 31,777 G. SQ. FT.
SIXTH FLOOR 6,500 G. SQ. FT.
TOTAL 275,000 G. SQ. FT.
including Swift Hydro
NET AREA ALL FLOORS - PHASE Ia and Ib
ARTISTS' STUDIO 7,250 NSF
INDUSTRIAL, COMMERCIAL 38,700 NSF
BUSINESS CENTER 4,230 NSF
WAREHOUSE, ARCHIVES 9,036 NSF
EXHIBITION 3,000 NSF
LIVE WORK 35,540 NSF
SHELL SPACE 2,540 NSF
NET TOTAL 102,000 NSF
CONNECTICUT RIVER
section 3 page 6
ARTISTS' LIVE & WORK 4,230 NSF
WAREHOUSE/ARCHIVE 9,036 NSF
NSF - IST FLOOR 13,266 NSF/PHASE I
TOTAL GSF - IST FLOOR 17,417 GSF/PHASE I
WASTE WATER TREATMENT PLANT
BLDG. #1
BLDG. #2
BLDG. #3
EXIST. BRIDGE ROOF ABOVE TO BE REMOVED
NEW STAIR #3
NEW ELEVATOR
BLDG. #10
BLDG. #4
BLDG. #9
BLDG. #5
BLDG. #6
ST#3
COURTYARD
NEW RETAINING WALL
PARKING #13
NEW STAIR #2
NEW ELEVATOR
ENTRY
TUNNEL
COURTYARD
UNEXCAVATED AREA
SWIFT RIVER HYDRO OPERATIONS
REMOVE BUILDING 5A, 6A & 8
BLDG. #7
NEW STAIR #1
BLDG. #11
BRIDGE ABOVE
PHASE 1B
TOTAL 40,000 NSF (46,000 GSF)
PHASE 1A
TOTAL 62,000 NSF (74,400 GSF)
LATER PHASES
TOTAL 142,800 GSF
(DOES NOT INCLUDE SWIFT HYDRO)
GRAPHIC SCALE
0 10 20 30 40 60 80 120FT
POWER CANAL
1 FIRST FLOOR PLAN
SCALE: 1"-40'-0"
Finegold Alexander Associates Inc
ALLIED
Tighe&Bond
FXM Associates
STRATHMORE MILL FEASIBILITY STUDY FOR THE TOWN OF MONTAGUE

ATTACHMENT C

Hazardous Materials Inventory

Strathmore Mill Asbestos Inventory Table					
Building 1					
Sample ID	**Location**	**Material Description**	**Quantity**	**Test Result**	**Comments**
14-A,B,C	First floor	Sheetrock	-	Negative	Negative for asbestos.
15-A,B,C	First floor	Sheetrock tape and compound	-	Negative	Negative for asbestos.
16-A	**First floor, above small offices, two locations**	**Pipe TSI and fittings**	**110 LF**	**Positive**	**The pipe TSI is located above the small offices along the side of the room. Pipe diameters range from 1/4" to 4". All pipe TSI and fittings shall be removed and disposed of as ACM.**
17-A,B,C	**First floor, above small offices**	**Air-O-Cell pipe TSI**	**20 LF**	**Positive**	**The pipe TSI is located above the small offices along the side of the room. Pipe diameter is 1/4". All pipe TSI and fittings shall be removed and disposed of as ACM.**
25-A,B,C and A-19, A-20, A-21	**Throughout all floors**	**Window glaze**	**110 Count**	**Positive**	**Initially tested negative, supplemental samples discovered ACM.**
Same as 24-A,B,C	**Throughout all floors**	**Window caulk**	**110 Count**	**Assumed Positive**	**All window caulking must be removed and disposed of as ACM. Windows are approx. 4' x 6' in size.**
26-A,B,C	Second floor	Sheetrock and tape/compound	-	Negative	Negative for asbestos.
Assumed positive	**Throughout all floors**	**Transite components**	**1/8 Cubic yard**	**Assumed Positive**	**Miscellaneous components inside electrical boxes throughout building. Approx. 15 locations.**
Assumed positive	**Second floor**	**Pipe TSI and fittings**	**120 LF**	**Assumed Positive**	**Pipe diameters range from 1"-4". All pipe TSI and fittings must be removed and disposed of as ACM.**
27-A,B,C	Second floor, small room	12"x12" floor tile and mastic	-	Negative	The floor tile and mastic tested negative for asbestos.
39-A,B,C	Third floor office area hallway	White square pattern linoleum	-	Negative	The flooring tested negative for asbestos.
40-A,B,C	Third floor bathroom	Gray covebase and mastic	-	Negative	The covebase and mastic tested negative for asbestos.
41-A,B,C	Third floor bathroom	Gray spotted linoleum	-	Negative	The flooring tested negative for asbestos.
A-22, A-23, A-24	Third floor throughout	Wall panel adhesive	-	Negative	Adheres wall panels to wall.
A-25, A-26, A-27	Third floor stairwell	Plaster	-	Negative	
42-A,B,C	Third floor offices and hallway	6" brown covebase and mastic	-	Negative	The covebase and mastic tested negative for asbestos.
Assumed positive	**Third floor near door**	**Pipe TSI**	**15 LF**	**Assumed Positive**	**Pipe TSI must be removed and disposed of as ACM.**
49-A,B,C	Fourth floor	2'x4' ceiling tiles	-	Negative	The tiles tested negative for asbestos.
Assumed positive	**Fourth floor**	**Pipe TSI and fittings**	**400 LF/50 fittings**	**Assumed Positive**	**All pipe TSI and fittings shall be removed and disposed of as ACM. Pipe diameters range from 2" to 12" pipe.**
50-A,B,C	Fourth floor	Brown speckled linoleum floor and mastic	-	Negative	The flooring tested negative for asbestos.
Assumed positive	**Attic**	**Pipe TSI and fittings**	**20 LF/5 fittings**	**Assumed Positive**	**All pipe TSI and fittings shall be removed and disposed of as ACM. Pipe diameters range from 2" to 12" pipe.**
Assumed positive	**Roof**	**Roofing and flashing cements**	**7,200 SF**	**Assumed Positive**	**Treat all roofing materials as ACM until bulk sampling proves otherwise.**
Building 2					
7-A,B,C & A-37, A-38, A-39	Throughout all floors	Window glaze	-	Negative	
Assumed positive	**Throughout all floors**	**Window caulk**	**150 Count**	**Assumed Positive**	**The window caulking must be removed and disposed of as ACM. Collect samples to confirm presence of ACM. Windows are approx. 6' x 4' in size.**
Assumed positive	**First floor, main area**	**Pipe TSI**	**70 LF**	**Assumed Positive**	**The pipe TSI must be removed and disposed as ACM. The insulation is on 2" - 6" pipes.**
9-A,B,C	First floor, along ceiling above catwalk	Tar paper	-	Negative	White paper along ceiling

Sample ID	Location	Material Description	Quantity	Test Result	Comments
Assumed positive	**Second floor, main steam line area**	**Pipe TSI**	**150 LF**	**Assumed Positive**	**The pipe TSI must be removed and disposed as ACM. The insulation is on 2" - 6" pipes and is wrapped in a metal jacket.**
Assumed positive	**Third floor**	**Pipe TSI and fittings**	**60 LF/6 Fittings & 1 Cubic yard debris**	**Assumed Positive**	**The TSI is in poor condition and is on the ground in a metal pile. The TSI has a metal jacket around it for protection. All debris and contaminated metals shall be disposed as ACM.**
Assumed positive	**Third floor, around spiral stairs**	**Transite**	**20 SF**	**Assumed Positive**	**All transite shall be removed and disposed of as ACM.**
37-A,B,C	**Third floor, ceiling**	**Transite**	**4,000 SF**	**Positive**	**Transite is attached to large sections of the ceiling throughout the third floor. All transite shall be removed and disposed of as ACM.**
38-A,B,C	Third floor	Plaster and skim coat	-	Negative	Located on all of the columns and beams. Plaster contains a wire lathe for support.
A-31/31A, A-32/32A, A-33/33A	Third floor	12" Gray and white checkerboard floor tile and mastic	-	Negative	25' x 50' area.
Assumed positive	**Fourth floor**	**Pipe TSI and fittings**	**600 LF/60 fittings**	**Assumed Positive**	**All pipe TSI and fittings shall be removed and disposed of as ACM.**
Assumed positive	**Fourth floor, electrical room**	**Pipe TSI and fittings**	**100 LF/10 fittings**	**Assumed Positive**	**All pipe TSI and fittings shall be removed and disposed of as ACM.**
51-A,B,C	Fourth floor	Floor backing	-	Negative	The floor backing tested negative for asbestos.
Assumed positive	**Fourth floor ceiling**	**Transite**	**1,700 SF**	**Assumed Positive**	**All transite that is attached to the ceiling shall be removed and disposed of as ACM.**
Assumed positive	**Roof**	**Roofing and flashing cements**	**8,000 SF**	**Assumed Positive**	**Treat all roofing materials as ACM until bulk sampling proves otherwise.**
Assumed positive	**Fifth floor**	**Pipe TSI and fittings**	**150 LF/15 fittings**	**Assumed Positive**	**All pipe TSI and fittings shall be removed and disposed of as ACM. Pipe diameters range from 2" to 12" pipe.**
Building 3					
8-A,B,C & A-34, A-35, A-36	**First floor**	**Window glaze**	**28 Count**	**Positive**	**Windows are 15'x3' and encased in concrete.**
Assumed positive	**First floor, upper level cat walk area**	**Pipe TSI**	**15 LF**	**Assumed Positive**	**TSI insulates 12" diameter pipe.**
A-28, A-29, A-30	Throughout #3 stairwell	Window glaze	-	Negative	Windows are 4'x5'.
34-A,B,C	Third floor, bathroom by stairs	Linoleum flooring and mastic	-	Negative	The flooring tested negative for asbestos.
Assumed positive	**Third, fourth, fifth and attic floors**	**Window caulk**	**125 count**	**Assumed Positive**	**All window caulking must be removed and disposed of as ACM. Window sizes are approx. 6' x 4'.**
35-A,B,C	Throughout	Window glaze	-	Negative	Windows (primarily upper levels) are 6' x 4' in size. Additional samples of glazing should be collected to confirm as non-ACM.
Assumed positive	**Third floor**	**Pipe TSI**	**10 LF**	**Assumed Positive**	**Metal jacketed TSI must be removed and disposed of as ACM.**
Assumed positive	**Fourth floor**	**Pipe TSI and fittings**	**450 LF/60 fittings**	**Assumed Positive**	**Pipe is 2"-8" inches in diameter. All pipe TSI and fittings shall be removed and disposed of as ACM.**
53-A,B,C	Fourth floor	Sheetrock and tape/compound	-	Negative	The sheetrock and tape/compound tested negative for asbestos.
Assumed positive	**Fifth floor**	**Pipe TSI and fittings**	**35 LF/5 fittings**	**Assumed Positive**	**All pipe TSI and fittings must be removed and disposed of as ACM.**
Assumed positive	**Roof, including 3a stairwell**	**Roofing and flashing cements**	**8,900 SF**	**Assumed Positive**	**Treat all roofing materials as ACM until bulk sampling proves otherwise.**
Building 3A Stairwell					
13-A,B,C	First floor	Window glaze in door	-	Negative	The window glaze tested negative for asbestos.
54-A,B,C	Throughout all floors	Plaster and skim coat	-	Negative	The plaster and skim coat tested negative for asbestos.
Building 4					

Sample ID	Location	Material Description	Quantity	Test Result	Comments
10-A,B,C	Second floor	Black tar coating with cloth on duct work	120 SF	Positive	Fiberglass insulation, wire, and all associated material must be removed.
Assumed positive	Second floor	Pipe TSI and fittings	10 LF	Assumed Positive	1"-4" pipe diameter. Insulation is encased in metal jacket.
11-A,B,C	Second floor by column	Fiberglass pipe wrap	-	Negative	1"-4" pipe diameter.
Assumed positive	Second floor	Window caulk	1 count	Assumed Positive	The window caulking must be removed and disposed of as ACM.
12-A,B,C	Second floor	Pipe wrap on fiberglass insulation	-	Negative	The pipe wrap did not contain asbestos.
Assumed positive	Second floor	Pipe TSI	40 LF	Assumed Positive	6"-12" diameter pipes. All insulation must be removed and disposed of as ACM.
Assumed positive	Third floor	Transite	7,250 SF	Assumed Positive	Entire ceiling has transite on it, some of it multi-layered. Remove and dispose of all transite as ACM.
Assumed positive	Third and fourth floor	Window caulk	30 count	Assumed Positive	Windows are replacement vinyl type and boarded up. Windows are approx. 4' x 6'.
Assumed positive	Fourth floor	Pipe TSI and fittings	30 LF/10 fittings	Assumed Positive	All pipe TSI and fittings are to be removed and disposed of as ACM.
Assumed positive	Roof	Roofing and flashing cements	3,000 SF	Assumed Positive	Treat all roofing materials as ACM until bulk sampling proves otherwise.
			Building 5		
1-A,B,C	First floor, Boiler room	Fiberglass insulation pipe wrap	-	Negative	
2-A	First floor, Boiler room	Pipe TSI	400 LF / 40 Cubic yards debris	Positive	1"-4" pipe diameter. All pipe TSI is to be removed and disposed of as ACM. Debris under and around piping systems has become co-mingled with building debris. It appears some piping has been abated since 2005 inspection.
3-A	First floor, Boiler room	Pipe fittings	60 fittings	Positive	1"-4" pipe diameter. All fittings shall be removed and disposed of as ACM.
4-A,B,C	First floor, Boiler room, oil pump system	Fiberglass insulations with white coating	-	Negative	Located on heat exchangers under metal jacket.
Assumed positive	First floor	Interior Boiler gaskets and rope insulations	(4) 4' x 5' x 5' boiler units	Assumed Positive	Associated with (4) HB smith metal clad boilers.
5-A,B,C & 6-A,B,C	First floor	Interior Boiler gaskets and packing insulation within old boiler system	300 cubic yards	Positive	(3) original boilers are 30'x20'x30' each. All boilers must be dismantled under containment. All boiler components, gaskets, etc. shall be disposed of as contaminated with ACM or fine cleaned and recycled.
Assumed positive	First floor, Boiler room	Breech insulation	75 LF	Assumed Positive	16" diameter breeching piping associated with main boiler system.
Assumed positive	First floor, Boiler room, oil pump system	Fittings	20 count	Assumed Positive	1" to 4" diameter fittings.
Assumed positive	First floor, Boiler room	Breech insulation	-	Assumed Positive	Initially quantified as 400 SF, has been abated.
Assumed positive	First floor, Boiler room	Breech and boiler gaskets	Throughout all boiler breeching	Assumed Positive	All metal mating surfaces shall be opened and cleaned of the ACM gasketing found between them.
Assumed positive	Fourth and fifth floors	Window glazing and caulking	18 Count	Assumed Positive	4' x 5' sized windows. Assume as ACM until bulk sampling proves otherwise.
Assumed positive	Fifth floor and attic	Transite panels	1,300 SF	Assumed Positive	Panels nailed in place to ceilings
Assumed positive	Fourth and fifth floor	Pipe TSI and fittings	90 LF/10 fittings	Assumed Positive	The pipe TSI and fittings shall be removed and disposed of as ACM.
A-43/43A, A-44/44A	Fourth floor	12" floor tile and mastic	375 SF double layered	Negative but treat as ACM	Top layer of double layered floor tile system. Bottom layer tested positive. Treat both layers as ACM due to inability to separate. Remove interior partitions, etc. to access.
A-45/45A	Fourth floor	9" floor tile and mastic	255 SF	Floor tile positive, mastic negative	Applied on wood. Remove interior partitions, etc. to access.
Assumed positive	Fourth floor	Transite panels	300 SF	Assumed Positive	Panels nailed in place in office / locker area.

Sample ID	Location	Material Description	Quantity	Test Result	Comments
A-49, A-50	Fourth floor	Vinyl sheet flooring	-	Negative	Within office area, approx. 1000 SF.
Assumed positive	**Attic**	**Pipe TSI and fittings**	**20 LF/2 fittings**	**Assumed Positive**	**The pipe TSI and fittings shall be removed and disposed of as ACM.**
Assumed positive	**Roof**	**Roofing and flashing cements**	**2,800 SF**	**Assumed Positive**	**Treat all roofing materials as ACM until bulk sampling proves otherwise.**
			Building 6		
Assumed positive (caulking) & A-40, A-41, A-42 (glazing)	**Throughout**	**Window caulk and glazing compounds**	**15 count**	**Assumed Positive**	**All window caulking and glazing shall be removed and disposed of as ACM. Glazing tested positive for asbestos. Windows are approx. 6' x 4'.**
Assumed positive	**Third floor**	**Transite panels and components**	**450 SF & 2 Cubic yards**	**Assumed Positive**	**Located on ceiling and around spiral staircase. Components stored on pallets.**
36-A,B,C	Third floor	Shotcrete and finish coating	-	Negative	pipe is 2"-8" inches in diameter. All pipe TSI and fittings shall be removed and disposed of as ACM.
52-A,B,C	**Fourth floor**	**Floor matting**	**400 SF**	**Positive**	**Located on the floor of the room. Located under a significant amount of stored components and other wood flooring.**
Assumed positive	**Fourth floor**	**Pipe TSI and fittings**	**50 LF/10 fittings**	**Assumed Positive**	**The pipe TSI and fittings shall be removed and disposed of as ACM.**
Assumed positive	**Fourth and fifth floor**	**Transite**	**180 SF**	**Assumed Positive**	**Located around spiral staircase.**
Assumed positive	**Roof**	**Roofing and flashing cements**	**3,600 SF**	**Assumed Positive**	**Treat all roofing materials as ACM until bulk sampling proves otherwise.**
			Building 7		
Assumed positive	**Second floor**	**Pipe TSI and fittings, TSI block & Debris**	**100 LF/100 SF mag block / 3 Cubic yards debris**	**Assumed Positive**	**The pipe TSI is in a metal jacket. There is also a significant amount of pipe and magnesium block debris (on floor and on ducts) that must be removed and disposed of as ACM.**
Assumed positive	**Second floor**	**Transite debris**	**1/2 Cubic yard**	**Assumed Positive**	**Broken transite panel debris observed on ground.**
Assumed positive	**Throughout**	**Window caulk**	**35 count**	**Assumed Positive**	**Windows are approx. 6' x 4'.**
31-A,B,C	Third floor	Linoleum flooring and mastic	-	Negative	The flooring tested negative for asbestos.
32-A,B,C	Third floor	Brown covebase and mastic	-	Negative	The covebase and mastic tested negative for asbestos.
33-A,B,C	Throughout	Window glaze	-	Negative	The window glaze tested negative for asbestos.
Assumed positive	**Third floor**	**Transite**	**2,500 SF**	**Assumed Positive**	**Transite is attached to ceiling.**
Assumed positive	**Fourth floor**	**Pipe TSI and fittings**	**120 LF/10 fittings**	**Assumed Positive**	
Assumed positive	**Roof 7/7A**	**Roofing and flashing cements**	**7,000 SF**	**Assumed Positive**	**Treat all roofing materials as ACM until bulk sampling proves otherwise.**
			Building 7A		
28-A,B,C	Second floor	12"x12" white floor tile and mastic	-	Negative	White and blue floor tile is mixed together.
29-A,B,C	Second floor	12"x12" blue floor tile and mastic	-	Negative	White and blue floor tile is mixed together.
30-A,B,C	**Second floor, back room with pump pit**	**Transite wall**	**250 SF**	**Positive**	**Transite located in unsafe area. Special access plans necessary for safe abatement.**
			Building 8		
Same as 10-A,B,C	**Second floor**	**Fan unit insulation, black tar coating**	**30 SF**	**Assumed Positive**	**All tar coating and insulation shall be removed and disposed of as ACM.**
Building 10-Entire area has been abated, demolished and removed from site in 2012					
			Building 11		
Assumed positive	**First floor, throughout**	**Pipe TSI**	**120 LF**	**Assumed Positive**	**Two areas observed.**
Assumed positive	**First floor**	**TSI debris**	**1/2 Cubic yard**	**Assumed Positive**	**Debris was found in various locations throughout floor.**

Sample ID	Location	Material Description	Quantity	Test Result	Comments
Assumed positive	**West end lowest level, Mezzanine, second level**	**Transite panels**	**1,900 SF**	**Assumed Positive**	**Transite panels nailed to walls and ceilings throughout western area. Some small transite components throughout / within electrical boxes, all floors.**
Assumed positive	**Throughout**	**Transite components**	**1/4 Cubic yard**	**Assumed Positive**	**Transite panels nailed to walls and ceilings throughout western area. Some small transite components throughout / within electrical boxes, all floors.**
A-01, A-02, A-03	Throughout	Paper	-	Negative	Under floorboards.
18-A,B,C & 19-A,B,C	**Throughout**	**Window glazing and caulking**	**120 count**	**Positive**	**Windows are located throughout all levels and are approx. 6' x 5' in size or smaller. Treat all caulking as ACM.**
Assumed positive	**Second floor**	**Pipe TSI**	**120 LF**	**Assumed Positive**	**1"-6" pipe diameter.**
20-A,B,C	Second floor	Fiberglass pipe TSI wrap	-	Negative	The pipe wrap did not contain asbestos. Located near hazardous waste collection area.
21-A,B,C	Second floor, bathroom stalls	9x9 gray floor tile and mastic	-	Negative	The floor tiles are in bad condition and most of them are already lifting.
A-04/04A/04B, A-05/05A/05B, A-06/06A/06B, A-07/07A/07B, A-08/08A/08B, A-09/09A/09B	Second, fourth and fifth floors	Sheetrock/ seam tape/joint compound	-	Negative	Comprises interior walls.
Assumed positive	**Third floor**	**Pipe TSI and fittings**	**90 LF/8 fittings**	**Assumed Positive**	**4"-12" pipe diameter. Some of the pipe TSI is encased in a metal jacket. All TSI and fittings shall be removed and disposed of as ACM.**
Assumed positive	**Fourth floor**	**Pipe TSI and fittings**	**225 LF/35 fittings**	**Assumed Positive**	**4"-12" pipe diameter. Some of the pipe TSI is encased in a metal jacket. All TSI and fittings shall be removed and disposed of as ACM.**
Assumed positive	**Fourth floor**	**Transite**	**3,500 SF**	**Assumed Positive**	**Transite is attached to ceiling.**
45-A,B,C	Fifth floor	12"x12" gray floor tile and mastic	325 SF	Negative	The floor tile and mastic tested negative for asbestos.
46-A,B,C	Fifth floor	Black covebase and mastic	250 LF	Negative	The covebase and mastic tested negative for asbestos.
47-A,B,C	Fifth floor	12"x12" tan floor tile and mastic	300 SF	Negative	The floor tile and mastic tested negative for asbestos.
48-A,B,C	Fifth floor	12"x12" brown floor tile and mastic	45 SF	Negative	The floor tile and mastic tested negative for asbestos.
49-A,B,C	Fifth floor	Sheetrock and tape/compound	4,500 SF	Negative	The sheetrock and tape/compound tested negative for asbestos.
Assumed positive	**Fifth floor**	**Pipe TSI and fittings**	**50 LF/10 fittings**	**Assumed Positive**	**The pipe TSI and fittings shall be removed and disposed of as ACM.**
Assumed positive	**Sixth floor**	**Pipe TSI and fittings**	**35 LF/5 fittings**	**Assumed Positive**	**The pipe TSI and fittings shall be removed and disposed of as ACM.**
A-10, A-11, A-12	Sixth floor	Red paper	-	Negative	Under floorboards.
Assumed positive	**Roof**	**Glazing compound**	**(1) 10' x 10' skylight**	**Assumed Positive**	**Treat skylight as ACM until bulk sampling proves otherwise.**
A-13, A-14, A-15, A-16, A-17, A-18	**Roof**	**Roofing, flashing cements and silver paint layers**	**7,700 SF**	**Assumed Positive**	**Treat all roofing materials as ACM until bulk sampling proves otherwise.**
Exterior areas					
Assumed positive	Courtyard outside building 3A	Breech insulation	-	Assumed Positive	Has been abated.
Assumed positive	Courtyard outside building 1	Fitting	-	Assumed Positive	Has been abated.

Notes:
1. Negative - A negative result contains no asbestos
3. Positive - A positive result contains trace to greater than 1% asbestos or more
4. Assumed Positive - Material that was not sampled but is assumed to contain asbestos
5. Bolded Area - Any material that tested as trace, positive or assumed positive for asbestos.
6. SF - Square Feet
7. LF - Linear Feet
8. ACM - Asbestos Containing Material

Supplemental limited asbestos survey performed by Brian F. Day, Tighe & Bond, December 2014. Massachusetts Inspector # AI061695.

ATTACHMENT D

Ability to Leverage

Franklin Regional Council of Governments

November 2, 2023

Steve Ellis, Town Administrator
Town of Montague
1 Avenue A
Turners Falls, MA 01376

Dear Mr. Ellis,

The Franklin Regional Council of Governments (FRCOG) is pleased to confirm our commitment as a partnering organization to the Town of Montague to support the clean-up of the former Strathmore Mill at 20 Canal Road in the village of Turners Falls, MA. The FRCOG is a strong advocate for the clean-up and redevelopment of this site and the revitalization of this community, which is one of our largest population centers and most economically distressed areas in our rural region. The clean-up of contaminated sites and their return to productive use is a top goal in both the Regional Plan for Sustainable Development for Franklin County (2013) and the 2020-2025 Franklin County Comprehensive Economic Development Strategy (CEDS) Plan. In both plans, the Strathmore Mill project was specifically highlighted due to its regional significance as a site in need of remediation and its potential beneficial reuse.

According to the Climate & Economic Justice Screening Tool, the village of Turners Falls (Census Tract 25011040701) is considered "**disadvantaged**" due to its density of households with low incomes, housing cost burden and prevalence of lead paint in homes. To combat these conditions, local government officials and community leaders are committed to bettering the physical environment so as to improve the health and wellbeing of residents as well as protect the area's natural resources.

This site is a significant blight and hazard to the people of this community and to the environmental health of the Connecticut River. With its proximity to the downtown, and despite local government's attempt to secure the site, the building complex is an attractive nuisance and hazard to anyone who goes on the property. With its deteriorated condition and limited access, if there were another fire or structure collapse, it would be an extremely dangerous situation for public safety officials.

Over the last twenty years, FRCOG has received 10 EPA assessment grants and operated an EPA-funded Brownfields Clean-up Revolving Loan Fund (which is closed out). As part of our agreement oversight experience, we use EPA's online ACRES system to maintain records for brownfield sites in our region, including the former Strathmore Mill site. This property's ACRES record, #15928, reflects past assessment activity as well clean-up activity specifically for the Building #10 debris pile (a standalone building on the property that was destroyed by fire in 2013).

12 Olive Street, Suite 2 | Greenfield, MA 01301-3351 | 413-774-3167 | www.frcog.

We commit to work with the Town of Montague on this clean-up project by having FRCOG staff continue to update the project's ACRES record, as requested. FRCOG staff will input data into ACRES on behalf of the Town for this project in a consistent and timely manner. **In addition, we also commit to supporting the Town's outreach efforts, as requested.** Such assistance may include providing opportunities for the project to be presented at region-wide public meetings as well as offering to have FRCOG staff share expertise in public information sessions. If there are other ways FRCOG staff can assist the Town in the successful execution of this project, we are willing to do so.

For years, the Town of Montague's municipal staff and elected officials have been committed to conducting thoughtful, engaged public planning processes to evaluate current conditions and envision a future for this property and the village's Historic Canal District that benefits all members of the community and protects the natural environment. We are confident that the Town of Montague's municipal staff have the experience and expertise to successfully manage this project and ensure that community members are engaged throughout.

We look forward to continuing to work with you and the Town on this important project, and to seeing this site transform from a blight to a regional asset. If there are any questions or comments, please contact myself or our Director of Planning Jessica Atwood at jatwood@frcog.org or 413-774-3167 x123.

Sincerely,

Linda Dunlavy
Executive Director

TOWN OF MONTAGUE
TOWN CLERK'S OFFICE
One Avenue A
Turners Falls, Massachusetts 01376
413 863-3200 ext 203

townclerk@montague-ma.gov

Debra A. Bourbeau
Town Clerk

Madelyn E. Hampp
Assistant Town Clerk

November 13, 2017

U.S. EPA New England
Attn: Frank Gardner
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

Dear Mr. Gardner.

Please be advised that Montague Town Meeting Members passed the sum of $385,000 for the purpose of abating hazardous and asbestos containing materials within the Strathmore Mill Complex at the Annual Town Meeting held on Saturday, May 7, 2016.

On Monday, June 27, 2016 the Town of Montague passed a debt exclusion vote to exempt from the provisions of Proposition Two and One-Half, so called, the amounts required to pay for the bond issued in order to fund the abatement of hazardous and asbestos containing materials, including any incidental and related costs, within the Strathmore Mill Complex, 20 Canal Road in Turners Falls.

Please see attached certified votes.

If you have any questions or need further information, I can be reached at 413-863-3200, ext 203 or townclerk@montague-ma.gov.

Sincerely,

Debra A. Bourbeau

Debra A. Bourbeau
Montague Town Clerk

Connecticut River Conservancy

Clean water. Healthy habitat. Thriving communities.

15 Bank Row, Greenfield, MA 01301
413.772.2020 · www.ctriver.org

U.S. EPA New England
Attn: Frank Gardner
5 Post Office Square, Suite 100
Mail Code: OSRR07-3
Boston, MA 02109-3912

Dear Mr. Gardner,

The Connecticut River Conservancy (CRC), formerly known as the Connecticut River Watershed Council, is pleased to partner with the Town of Montague on a US EPA Brownfields Cleanup grant project for the Strathmore Mill complex in the village of Turners Falls. CRC's mission is to protect our 4-state watershed to enjoy the beauty and recreational benefits of the Connecticut River, and enhance the environment and water quality. CRC applauds Montague for working to rehabilitate and revitalize an important waterfront property. One of the barriers to redevelopment of the Strathmore Mill property is cleanup of hazardous materials. The grant will help eliminate a threat to the River and help the Town move forward developing a piece of downtown Turners Falls while preserving an element of its industrial history.

CRC and the Town, together with other stakeholders, have been working collaboratively on the hydropower relicensing of the Turners Falls Dam. In negotiating the terms to a new license, we hope to improve flows in the Connecticut River that will support habitat, but also increase the recreational boating and fishing capacity of the river below the dam and adjacent to the Strathmore Mill. Adaptive re-use of the Strathmore property has some interconnections with improving the health and access to the Connecticut River in Turners Falls through relicensing.

CRC is pleased to partner with Montague on this project. We will help notify the public about the cleanup project through our print newsletter, member e-blasts, and through social media. We are happy to help in other ways as they arise. CRC supports Montague's application for a brownfields cleanup grant from US EPA. I can be reached at adonlon@ctriver.org or (413) 772-2020 x. 205. Thank you for your consideration.

Sincerely,

Andrea F. Donlon
Massachusetts River Steward

ATTACHMENT E

Community Notification

STUDY from page A1

by the Clean Energy Extension, points to roughly 11 MW of potential development on town property, 15 MW on commercial and farm roofs, and 37 MW at private residences.

The rest would mostly need to come from large, ground-mounted arrays. The draft recommends the town reach out to owners of already "disturbed" non-wooded and non-agricultural land to ascertain their interest in solar development. Specific areas – the southern part of Route 63, east of Millers Falls, and Montague City – are identified in the report.

The report also suggests that the town consider revising its bylaws to clarify the regulation of parking canopies, allow medium-scale solar "by right," and expand the areas where large-scale arrays are allowed beyond industrial and historic-industrial zones – while both strengthening provisions against clearing woodlands, and permitting some forest clearing with "off-site compensator mitigation."

The next steps, as of the summer, were for this draft to be reviewed by the town's solar planning committee and energy committee, then by other boards including the planning board and selectboard, and then presented to a community forum for more input. "These review processes are expected to result in revisions which will improve the clarity, content, and implementation of the plan," it reads.

"It is a living document that is mainly of bullet points – and how to bring other town boards into the conversation. The committee had already discussed the document at multiple meetings.

Member Ariel Elan, who attends most Montague selectboard meetings, said the committee should go to these boards with a clear game plan for the future. "Here is what we want, and this is what it is," she said.

"Well, Pam is shaking her head, and I am too," said Pick, referring to fellow committee member Pam Hanold. "We are trying to figure out how to be a conduit for this information." Pick added that she had recently approached the planning board with "specific asks," without a great deal of success.

Hanold said that the conservation commission, which was on the list of committees that should be engaged on the solar issue, was concerned almost exclusively with wetlands. Elan pointed out that local con coms had engaged with broader issues during the public debate a decade ago over the proposed natural gas pipeline.

Hanold stressed the role of the Commonwealth in directing local communities to make policy changes. "I can't imagine this is going to happen without the state doing something," she said.

Pick responded that the solar plan developed by the UMass extension was intended as a "tool." "It's not the state shoving something down our throats," she said. She then added that the legislature may soon pass state policy."

Several times Pick cited a study commissioned by the state Department of Energy Resources that estimated that sufficient developable sites exist to meet the Commonwealth's aggressive emissions reduction goals by the 2050s. The study by Synapse Energy, which used data from the Massachusetts Interactive Property Map to rate every parcel of land in the state, estimated that 152 gigawatts (GW) of electricity generation could be sited on "highly suitable" land without disturbing agriculture or woodlands. The report estimates that the state would only require between 27 and 34 GW to reach its climate goals.

However, the same report warns that these numbers "are estimates and are not intended to provide exact amounts of solar that can be built in a specific location. The purpose of this analysis is to be a source of information for policymakers, developers, communities, and other stakeholders; readers should not interpret it as instruction or recommendations about specific locations where solar should be built, or what kind of solar should be built at those locations."

Toward the end of the meeting Pick suggested that committee members email "feedback" about the summary document to her by November 10. A community forum soliciting public input about the UMass report will likely be held at a future date.

TOWN OF MONTAGUE

Notice of Intent to apply for an EPA Brownfields Cleanup Grant

The Town of Montague Selectboard intends to submit a proposal for an EPA Brownfields Cleanup Grant to conduct cleanup activities at the vacant mill at **20 Canal Road** in Turners Falls (Former Strathmore Mill).

A public information session will be held as part of the Selectboard meeting on **Monday, November 6 at 7:00 p.m.** at the Montague Town Hall Second Floor Meeting Room, One Avenue A, Turners Falls, MA to receive public comment and to discuss the draft proposal. Public comments may also be submitted via email to assistantTownAdmin@montague-ma.gov no later than Wednesday, November 8 at 4:00 p.m. Copies of the draft grant application will be available on or before October 27 at www.montague-ma.gov.

ATTACHMENT F

Proof of Ownership

VALLEY TITLE COMPANY, LTD.

377 Main Street, First Floor · Greenfield, MA 01301
413-774-6359 · Fax 413-774-6350 · valleytitle@valleytitleco.com

Title: 3057-D
To: Town of Montague
Walter Ramsey, Town Planner and Conservation Agent
Re: Strathmore site – Turners Falls Canal

TITLE CERTIFICATE

We have examined an abstract of title provided by Valley Title Company, Ltd. from the records of the Franklin County Registry of Deeds and relevant Probate Registries relative to the premises located in Turners Falls, Montague, Franklin County, Massachusetts, and described in the following deed and instrument of taking:

a. Deed from Fabulous Investment Opportunities LLC to Swift River Strathmore Development, LLC dated April 28, 2008 and recorded in Book 5494, Page 83;

b. Instrument of Taking by the Town of Montague dated October 3, 2005 and recorded in Book 4972, Page 251;

c. Judgment in Tax Lien Case dated February 19, 2010 and recorded in Book 5826, Page 165;

and from such examination as of document No. 12597 recorded on October 18, 2012, we are of the opinion that **The Town of Montague** holds good and sufficient record and marketable title thereto free from all matters of record except those set forth on Schedules "A" and "B" attached hereto.

This Certificate only covers "record title" as defined in G.L.C. 93 sec. 70 and does not cover any rights not appearing of record or improperly indexed, any defects, restrictions, or impediments arising from enactment or regulations of the federal government, Commonwealth of Massachusetts, and the municipality in which the land lies, or any agencies thereof, municipal or district taxes and other assessments, validity of corporate or other type existence, any and all boundaries and such state of facts as may be disclosed by an inspection of the premises or a survey, whether or not restrictions or covenants have been violated, bankruptcy proceedings not recorded in said registry of deeds, accuracy of descriptions or surveys, rights of parties in possession and any facts which would establish whether the locus is located within a flood plain.

This Certificate is to be used only in connection with the transaction (purchase and/or mortgage) for which the certificate has been requested and may not be used for future transactions without written permission of Valley Title Company, Ltd.

Searching Franklin and Hampshire Counties since 1986

Date: October 18, 2012

VALLEY TITLE COMPANY, LTD.

By: _____
David J. Singer, Esq.
Counsel for Valley Title Company, Ltd.

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