

**JOINT SELECTBOARD and BOARD OF HEALTH
MEETING NOTICE**

Due to COVID-19 Public Participation will be by:

Join Zoom Meeting: <https://zoom.us/j/97787605523>

Meeting ID: 977 8760 5523 **Password:** 090997

Dial into meeting: +1 646 558 8656 or +1 312 626 6799 or +1 301 715 8592

Tuesday, January 19, 2021

Topics may start earlier than specified, unless there is a hearing scheduled

Meeting Being Taped

Votes May Be Taken

1. 5:30 PM Selectboard Chair opens the meeting, including announcing that the meeting is being recorded and roll call taken
2. 5:30 Board of Health Chair opens the meeting, roll call taken
3. 5:31 Approve Minutes:
 - Joint Selectboard, Airport Commission, Finance Committee and Capital Improvements Committee: December 21, 2020
 - Joint Selectboard and Board of Health: December 21, 2020
 - Joint Selectboard and Board of Health: January 11, 2021
4. 5:32 Public Comment Period: Individuals will be limited to two (2) minutes each and the Selectboard will strictly adhere to time allotted for public comment
5. 5:35 COVID-19 Updates and Action Items
 - Review of any Updated State Guidance or Orders
 - Update on Montague COVID case counts and other summary data
6. 5:45 Consider motion to seek Final Judgement and Foreclosure with Regard to Property of Solutions Consulting Group, LLC located at 11 Power Street, Turners Falls
7. 5:55 Strategy for IT Support needs for remainder of FY21 and FY22

Upcoming Meetings:

- Selectboard Meeting, **MONDAY, January 25, 6:30 PM** via Zoom



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 1
5 POST OFFICE SQUARE – SUITE 100
BOSTON, MASSACHUSETTS 02109-3912

MEMORANDUM

DATE: September 16, 2020

SUBJ: Request for a Removal Action at the Railroad Salvage/Griswold Cotton Mill Site,
Montague, Franklin County, Massachusetts - **Action Memorandum**

FROM: Allen K. Jarrell, On-Scene Coordinator *Allen K Jarrell*
Emergency Response and Removal I Section

THRU: Edward J. Bazenias, Chief
Emergency Response and Removal I Section **EDWARD BAZENIAS** Digitally signed by EDWARD BAZENIAS
Date: 2020.09.17 09:41:53 -

Carol Tucker, Chief
Emergency Planning & Response Branch **CAROL TUCKER** Digitally signed by CAROL TUCKER
Date: 2020.09.17 12:15:43 -04'00'

TO: Bryan Olson, Director
Superfund and Emergency Management Division

I. PURPOSE

The purpose of this Action Memorandum (AM) is to request and document approval of the proposed time-critical removal action (RA) at the Railroad Salvage/Griswold Cotton Mill Site (the Site), which is located at 11 Power Street in Montague, Franklin County, Massachusetts. Asbestos-Containing Materials (ACM) in building rubble and fire debris piles at the Site, if not addressed by implementing the response actions selected in this AM, will continue to pose a threat to human health and the environment. This RA is considered nationally significant or precedent-setting because asbestos is the principle contaminant of concern. There has been no use of the OSC's \$200,000 warrant authority.

There is considerable uncertainty in regard to the overall costs for this project. EPA and its contractors were unable to fully characterize the extent of asbestos contamination due to the poor condition of the remaining structures and the haphazard nature of the debris piles. The OSC will make every effort to reduce uncertainty and minimize the volume of debris for disposal by collecting additional samples for asbestos screening, segregating (and leaving on-site) the asbestos-free debris, and decontaminating large pieces of debris, if feasible and cost-effective. These activities are included in the Proposed Actions described in Section V.A.1 of this AM.

I. SITE CONDITIONS AND BACKGROUND

CERCLIS ID#: MAN 00010320
SITE ID#: 01QH
CATEGORY: Time-Critical

A. Site Description

1. Removal site evaluation

On July 22, 2020, at the request of the Massachusetts Department of Environmental Protection (MassDEP), an EPA On-Scene Coordinator (OSC) and a Region 1 Superfund Technical Assessment and Response Team (START) contractor mobilized to the Site to conduct a Preliminary Assessment (PA) and Site Reconnaissance (SR). They conducted a perimeter SR, performed air and radiation monitoring and photo-documented site conditions and found no elevated readings above background. Virtually the whole building was collapsed and portions of the western, northern, and eastern walls of the main building were standing. Large demolished building rubble and fire debris piles lay on the basement and first floors inside these walls. There is no way to safely inspect these debris piles; therefore, photos of these piles were taken. Potential sample locations were identified around the periphery of these large piles and outside the remaining standing portions of the brick walls.

On July 29, 2020, an EPA OSC and three START contractors mobilized to the Site to conduct the site investigation (SI). The challenge to sample suspected ACM in locations that could not be safely accessed was discussed. The Site is mostly surrounded by chain-link fencing, except for one section of damaged fencing that allowed complete access to the Site. There were piles rubble consisting of brick, steel I-beams, wood, glass, and piping. Approximately 20 samples of potential ACM were collected from the periphery of the building and debris pile. Suspected ACM samples collected included multi-layered roofing material, a white fibrous material, caulking material, tar roofing paper, tar-like mastic from metal roofing flashing, corrugated roofing material, pipe wrap, window caulking, white tile material, a white tile mastic, white fabric cloth material, grey fiber/fabric material, and roofing material. Following the sample collections, the samples were prepared and sent for analysis at the EPA New England Laboratory. Results from these EPA samples indicated that only one of these samples contained friable ACM. Please refer below to *Section II.A.3. Site Characteristics* for additional information regarding historical data.

2. Physical location

The Railroad Salvage/Griswold Cotton Mill Site is located at 11 Power Street in the Village of Turners Falls in the Town of Montague, Franklin County, Massachusetts. The population is about 8500. There are 2 elementary schools and a special education school in Turners Falls. There is also a long-term nursing home, a homeless shelter, a senior center, and a food distribution center in Turners Falls. The Site geographic coordinates are 42° 36' 26.0" north latitude, 72° 33' 44.4" west longitude. The Site is approximately 2.27 acres and is occupied by two former buildings. The buildings were constructed in approximately 1880. The Site is located between the Connecticut River and a hydroelectric canal. Residential properties are located across the canal to the east; the opposite bank of the Connecticut River to the west is

sloped, undeveloped land; Northeast Utilities Turners Falls #1 hydroelectric station is located to the south; and an office building occupied by the Franklin County Regional Housing and Redevelopment Authority is located to the northeast.

3. Site characteristics

The Site is zoned Historic Industrial. The Site buildings were constructed in approximately 1880. From 1884 to 1914, Turner Falls Cotton Mill owned and operated the buildings. The mill manufactured light sheeting and bandages. Sanborn maps indicate that the building lights were fueled by oil, although there are no underground storage tanks or aboveground storage tanks on site. The buildings are also believed to have been fueled by coal. On the 1914 Sanborn map, an “oil room” is indicated on the south side of the buildings. From 1920 to 1930, Griswoldville Manufacturing owned and operated the buildings. From 1935 to 1950, Turner Falls Plant of Kendall Mills operated a manufacturing plant for cotton gauze. Subsequent occupants of the buildings included Railroad Salvage, a retail store, and other occupants that used the property as a warehouse. Solutions Consulting Group, LLC acquired the Site in 2013.

In 2007, Tighe & Bond completed a limited Phase II ESA report as part of a regional Brownfields investigation. No volatile organic carbons (VOCs), polychlorinated biphenyls (PCBs), or cyanide were detected in the soil samples. Extractable petroleum hydrocarbons and polyaromatic hydrocarbons were detected above method detection limits, but below Massachusetts Contingency Plan (MCP) Reportable Concentrations (RC) or Method 1 Cleanup Standards. Low level concentrations of arsenic, barium, cadmium, chromium, mercury, and lead were detected in several soil samples, but below MCP RC or Method 1 standards. No positive detections were identified in any of the groundwater samples. Asbestos or ACM were not mentioned or identified in the report.

In 2008, Frawley Engineering conducted an on-site investigation and engineering evaluation of the Site which, at that time, consisted of several adjoining structures interconnected to the main four-story building, most of which were about to collapse. The report concluded that the buildings were not safe to enter, that they should be boarded up, and that the existing fence should be made more secure. Also noted during the 2008 evaluation was a Debris Pile located within the main building walls which comprised an approximate 85- by 75-foot area of the main building which collapsed onto itself. The Debris Pile still exists and currently rests on the basement floor which is assumed to consist of both concrete and exposed soil areas. The remaining 135- by 75-foot 4-story portion of the main building has also been subject to partial collapse, with significant building debris resting on the first floor of the building. The basement area underneath this section consists of a concrete floor and continues to be accessible but is likely unsafe to access for remediation of visually identified suspect asbestos and other suspect hazardous components.

In 2011, Tighe & Bond completed a pre-demolition evaluation of the Debris Pile, which included an asbestos survey of the limited accessible areas of the Debris Pile. The following materials represent the ACM that were found to be present throughout the Debris Pile and that would likely be impacted during the Debris Pile remediation:

- Thermal system insulation and debris associated with pipe and fitting coverings.
- Inaccessible floor coverings presumed present near the bottom of the pile.

- Roofing cements typically used as patch work.
- Various window caulking/glazing materials.

Thirty-three samples were collected from various materials suspected of containing asbestos. Analytical results of samples collected for asbestos analysis indicated that asbestos minerals were detected above laboratory reporting limits (RLs) in five of these samples. Chrysotile asbestos was detected at trace amounts in three samples that were collected from floor tiles, and at 10% in two samples, one collected from mastic and one collected from frame caulking. All pipe insulation observed was assumed to contain asbestos due to its age and visual confirmation.

Tighe & Bond also conducted a visual inspection of oil and hazardous materials (HazMat). Their findings listed materials that may be encountered in the building rubble during demolition: mercury-containing fluorescent light tubes; fluorescent light ballasts containing PCBs; refrigerators, air conditioners and other refrigeration equipment; containers of fuel oils and other chemical items associated with boiler systems; various types of batteries (emergency light units, forklift batteries, etc.); mercury thermostats, switches and other mercury-containing products; and expired fire extinguishers. There was no ACM or HazMat removal after this evaluation.

In December 2016, a fire destroyed what remained of the mill complex. Montague Fire Department post fire demolition activities followed that knocked down any free-standing wall remnants into the center of the building to secure the building remains. What remains are large, comingled debris piles.

Although several environmental studies have occurred since 2007 documenting building and environmental conditions, no remediation has occurred. Quantities and concentrations identified in these studies have not changed so it is expected that ACM and potentially other contaminants remain throughout the building rubble and fire debris.

Based on information in EPA's EJSCREEN environmental justice screening tool, 0 out of 11 Environmental Justice Indexes for the area within a one-mile radius of the Site exceed the 80th percentile on a national basis.

4. Release or threatened release into the environment of a hazardous substance, or pollutant or contaminant

The primary contaminant of concern is friable asbestos. Asbestos is a hazardous substance as defined by Section 101(14) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA), 42 U.S.C. §9601(14). Friable ACM throughout the Site has been exposed to the elements and released to the environment. Airborne friable asbestos is a health threat to anyone walking on, traveling by or living near the Site.

5. National Priorities List (NPL) status

The Site is not currently on the NPL and has not received a Hazardous Ranking System rating.

6. Maps, pictures, and other graphic representations



Scene: Suspected ACM Pipe Wrap



Scene: Railroad Salvage/Griswold Cotton Mill

B. Other Actions to Date

At the request of MassDEP, EPA conducted a Site Reconnaissance on July 22, 2020 and a Site Investigation on July 29, 2020. Prior to these actions, EPA was not involved at this Site.

C. State and Local Authorities' Roles

1. State and local actions to date

The MassDEP asbestos program has inspected this Site. In December 2019, MassDEP requested that EPA conduct a PA/SI at the Site to determine if it met the criteria for a time-critical removal action. The town of Montague installed the chain-link security fence around the perimeter of the Site after the 2016 fire.

2. Potential for continued State/local response

The Town and MassDEP will continue to be involved with the Site and the OSC will meet regularly with staff people from these organizations. Initial consultations with the Town indicate a willingness to provide in-kind services such as water for dust suppression and mitigation. However, neither the Town nor MassDEP have the resources to address the imminent and substantial endangerment. MassDEP will address any long-term measures that may be required to address remaining Site risks, including post removal site control.

II. THREATS TO PUBLIC HEALTH OR WELFARE OR THE ENVIRONMENT, AND STATUTORY AND REGULATORY AUTHORITIES

As described below, the conditions at the Site meet the general criteria for a removal action, as set forth in 40 C.F.R. §300.415(b)(1), in that “there is a threat to public health or welfare of the United States or the environment,” and in consideration of the factors set forth in 40 C.F.R. §300.415(b)(2) as described below.

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants; [§300.415(b)(2)(i)];

Asbestos is a hazardous substance as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14) and 40 C.F.R. §302.4. Friable asbestos on the Site poses an inhalation threat to local residents and those who may enter the Site. Friable asbestos fibers cannot be contained because it will become airborne with air gusts. In addition, the collapsed buildings and debris ruins may act as an attractive nuisance, bringing unauthorized individuals in close contact with the friable asbestos present.

Asbestos fibers may enter the body by inhalation or ingestion. Breathing asbestos can cause asbestosis, a buildup of scar-like tissue in the lungs and in the membrane that surrounds the lungs. Symptoms of asbestosis include shortness of breath, coughing, and sometimes heart enlargement. Asbestosis is a serious disease that can lead to disability or death. Asbestos is also a known human carcinogen. Inhalation of asbestos fibers can cause cancer of the lung tissue and mesothelioma, a cancer of the membrane that surrounds the lung and other internal organs.¹

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

As indicated above, friable asbestos is commingled in the building rubble and fire debris. Wind can cause friable asbestos fibers to migrate to the surrounding community. Also, weather/ wearing will continue to degrade asbestos and enable ACM release. Environmental conditions will continue to degrade the buildings' conditions.

Threat of fire or explosion [§300.415(b)(2)(vi)];

Large amounts of wood are in the building rubble and fire debris piles and remain a significant

¹ Agency for Toxic Substances and Disease Registry (ATSDR), U.S. Department of Health and Human Services, Public Health Service, *Tox FAQs Fact Sheet for Asbestos, September 1996.*

fire hazard. In case of a fire, friable asbestos fibers from these piles will become airborne and migrate to the surrounding areas.

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

MassDEP and the Town have both indicated that due to other program priorities, staffing limitations, and lack of funds, they do not have the resources to address the Site.

III. ENDANGERMENT DETERMINATION

Asbestos is a hazardous substance as defined by Section 101(14) of CERCLA, 42 U.S.C. §9601(14) and 40 C.F.R. §302.4. Utilizing primarily the 2011 report and the PA/SI, EPA confirmed the presence of friable asbestos and ACM on the Site which, if not addressed by implementing the response actions selected in this Action Memorandum, will continue to present an imminent and substantial endangerment to public health, or welfare.

In accordance with OSWER Directive 9360.0-34 (August 19, 1993), an endangerment determination is made based on “appropriate Superfund policy or guidance, or on collaboration with a trained risk assessor,” which is outlined and discussed in Section III above. “Appropriate sources include, but are not limited to, relevant action level or clean-up standards, Agency for Toxic Substances and Disease Registry documents or personnel, or staff toxicologists.” In this case, EPA relied on EPA’s National Emission Standard for Hazardous Air Pollutants (NESHAP) and the EPA and MassDEP/Department of Labor Standards sample results for determining risk at the Site.

IV. PROPOSED ACTIONS AND ESTIMATED COSTS

A. Proposed Actions

1. Proposed action description

The removal action covered by this action memo will address actual or potential releases of hazardous substances, which may pose an imminent and substantial endangerment to public health, welfare or the environment. The proposed actions will protect public health, welfare and the environment. The removal action will focus on mitigating the imminent hazards of the areas that are structurally unsound and/or contain ACM.

The specific removal activities will include the following:

- Conduct a Site walk with the Emergency and Rapid Response Services contractor (ERRS).
- The Site will be secured by repairing the perimeter security fence to prevent unauthorized access. Site security may be provided during non-working hours to ensure adequate Site surveillance until the waste is transported off site. Should an extended period of storage be required, some other means of securing the Site may be implemented.
- Evaluate the structural integrity of the remaining standing wall remnants to determine

their stability and potential for collapse. If the standing walls are not structurally safe enough to enable contractor personnel to conduct the removal action, then dismantling the unstable sections will be necessary.

- Conduct personnel and perimeter air monitoring and implement dust control and suppression for worker protection and public health.
- Evaluate the uncertainties and information gaps that could impact the work plan and funding request.
- Conduct the removal and disposal of asbestos and ACM debris. Remove and dispose of any ACM-contaminated soil piles. The process shall also include provisions for onsite decontamination of larger debris, and segregation of asbestos-free debris. Asbestos material and asbestos-contaminated waste will be documented and shipped off site for disposal at EPA-approved facilities. Off-site disposal will be in compliance with the Off-Site Rule (40 CFR §300.440). All wastes will be staged in a secure area on-site while awaiting shipment off site.
- Conduct multi-media sampling as needed to support the above activities and OSWER directive.
- Conduct additional sampling/investigation of the soil/debris, and any drums/containers for hazardous contaminants at the Site. If hazardous substances are found (e.g., lead, mercury, PCBs, solvents) will be removed, categorized, staged, manifested, and shipped off-site for disposal at EPA-approved facilities. If they are exclusively petroleum product, they will be referred to the MassDEP for management.
- After the asbestos-containing debris is removed, conduct grade and backfill activities as needed to secure the open excavated areas of the Site. A visual marker may also be installed to delineate contaminated soils (if any) that may remain at depth or that cannot otherwise be excavated.
- Uncontaminated building rubble, construction debris, and fire debris will remain on-site.
- Repair other response related damage, if any.
- Refer the Site to MassDEP for any long-term measures that may be required to address remaining Site risks, including post removal site control.

Depending on anticipated storage duration prior to shipment for ultimate disposal, the OSC will determine whether waste will be staged on-site or shipped to a properly permitted temporary storage facility. Waste staging options will be evaluated based on cost.

2. Community relations

The Site is located in the central portion of the Town. Upon approval of the AM, the OSC will coordinate with the EPA Community Involvement Office to disseminate information regarding the project to the impacted residents and businesses. An EPA Community Involvement

Coordinator (CIC) staff will produce a Community Relations Plan and coordinate regularly with Town/State partners due to high level of government interest in this Site. EPA will also work closely with the Town/State officials as the project progresses. The CIC will also initiate and maintain an EPA website.

3. Contribution to remedial performance

The cleanup proposed in this AM is designed to mitigate the threats to human health and the environment posed by the Site. The actions taken at the Site would be consistent with and will not impede any future responses. The Site is not proposed for the NPL.

4. Description of alternative technologies

Consistent with the December 23, 2013 memorandum issued by Assistant Administrator Stanislaus as well as the Region 1 Clean and Greener Policy for Contaminated Sites, greener cleanup practices are considered for all cleanup projects. Greener cleanup is the practice of incorporating practices that minimize the environmental impacts of cleanup actions and maximize environmental and human benefit. In this case, where practicable, final disposal of waste from the Site will attempt to utilize an alternative technology. The specific treatment and disposal technology will depend on factors such as the quantity and hazardous characteristics, as well as the availability of alternate technologies. For instance, the ACM debris will be compressed and compacted in order to reduce volume before loading the debris into trucks for shipping off-site. EPA will implement recycling practices including recycling of paper, plastic, metal debris, etc.

The use of alternative technologies with regard to disposal options will be further examined as the site work progresses. On-site field screening and analytical techniques may be utilized during the removal action.

5. Applicable or relevant and appropriate requirements (ARARs)

Pursuant to 40 C.F.R. §300.415(j), removal actions shall, to the extent practicable considering the exigencies of the situation, attain ARARs. EPA has been working in coordination with MassDEP to determine the applicable state ARAR's for the Site. Current ARARs identified, but not limited to, are listed below.

Guidances to be Considered:

Framework for Investigating Asbestos-Contaminated Superfund Sites, OSWER Directive #9200.0-68 (Sept. 2008): Guidance on investigating and characterizing the potential human exposure from asbestos contamination in outdoor soil at Superfund sites.

Federal ARARs:

Clean Air Act, 40 C.F.R. Part 61: 42 U.S.C. §112(b)(1): National Emission Standard for controlling dust. The regulations establish emissions standards for 189 hazardous air pollutants. Asbestos is one of the hazardous air pollutants. Standards have been set for dust and release sources. The removal action will implement measures to meet these standards.

Clean Air Act, National Emission Standards for Hazardous Air Pollutants (NESHAPS: 40 C.F.R. Part 61.151): Standards for inactive waste disposal sites that apply to asbestos mills and manufacturing and fabricating. NESHAPS standards for preventing air releases from inactive asbestos disposal sites, including cover standards, dust suppression, and land use controls. Any areas of asbestos contaminated soil will be consolidated and shipped off-site for disposal at EPA-approved facility.

Clean Water Act, National Pollutant Discharge Elimination System (NPDES), 40 C.F.R. Parts 122 – 125; 122.26: Establishes the specifications for discharging pollutants from any point source into the waters of the U.S. Also, includes storm water standards for construction sites over one acre. Removal activities will be managed to prevent stormwater discharge from the Site. To the extent water generated from the removal action needs to be discharged to the River, applicable discharge standards will be met.

Clean Water Act, 40 C.F.R. §122.26(c)(ii)(C) and 122.44(k): NPDES regulations for storm water control and management.

Toxic Substances Control Act (Transport and Disposal of Asbestos Waste), 40 C.F.R. Subpart E, Appendix D: Provides standards for transport and disposal of materials that contain asbestos. Requires proper wetting and containerization. Asbestos will be managed in compliance with these standards.

State ARARs:

Massachusetts Air Pollution Control Regulations (310 CMR Section 7.00): this regulation stipulates that during construction and/or demolition activities, air emissions (i.e., dust, particulates, etc.) must be controlled to prevent air pollution. Construction activities will be managed to meet standards for visible emission (310 CMR Section 7.06): dust, odor, construction, and demolition (310 CMR Section 7.09) and standards for handling, transporting and disposing asbestos (310 CMR Section 7.15). During the removal action, appropriate measures would need to be taken to comply with these regulations.

Resource Conservation and Recovery Act (RCRA), Subtitle C: (40 C.F.R. Parts 260-262 and 264): Hazardous Waste Identification and Listing Regulations; Generator and Handler Requirements, Closure and Post-Closure. Massachusetts has been delegated the authority to administer these RCRA standards through its state hazardous waste management regulations. Waste generated will be tested to determine whether it exceeds hazardous waste thresholds and, if so, the hazardous waste will be managed on-site and until such time as it is shipped to an EPA-approved off-site disposal location.

314 CMR Section 4.05: Massachusetts Surface Water Quality Standards: These regulations limit or prohibit discharges of pollutants to surface waters to assure that surface water quality standards of the receiving waters are protected and maintained or attained. This may pertain to both discharges to surface water as a result of removal activities and any on-site waters affected by site conditions. On-site discharges to surface waters and adjacent wetlands, shall meet these substantive discharge standards.

The OSC has requested in writing that State officials identify additional State ARARs, if any. In

accordance with the National Contingency Plan (NCP) and EPA Guidance Documents, the OSC will determine the applicability and practicability of complying with each State ARAR that is identified in a timely manner.

6. Project schedule

Duration of the removal action activities shall be 12 months from the day of ERRS mobilization.

7. Estimated Costs

COST CATEGORY		CEILING
<i>REGIONAL REMOVAL ALLOWANCE COSTS:</i>		
ERRS Contractor		\$1,395,000.00
Interagency Agreement		\$ 0.00
<i>OTHER EXTRAMURAL COSTS NOT FUNDED FROM THE REGIONAL ALLOWANCE:</i>		
START Contractor		\$300,000.00
Extramural Subtotal		\$1,695,000.00
Extramural Contingency	12.5%	\$200,000.00
TOTAL, REMOVAL ACTION CEILING		\$1,895,000.00

V. EXPECTED CHANGE IN THE SITUATION SHOULD ACTION BE DELAYED OR NOT TAKEN

A delayed removal action or the absence of a removal action described herein will cause conditions at the Site to remain unaddressed, and threats associated with the presence of hazardous substances will continue to pose a threat to human health and the environment. In addition, there is intense Town, State, and Congressional interest in this Site that will continue throughout the duration of this project.

VI. OUTSTANDING POLICY ISSUES

This RA is considered nationally significant or precedent-setting because asbestos is the principle contaminant of concern. Concurrence of the HQ OEM Director was obtained prior to approval of this AM.

VII. ENFORCEMENT ... For Internal Distribution Only

See attached Confidential Enforcement Strategy.

The total EPA costs for this removal action practices that will be eligible for cost recovery are estimated to be \$1,895,000 (extramural costs) + \$100,000 (EPA intramural costs) = \$1,995,000 X 1.4053 (regional indirect rate) = \$2,803,574².

VIII. RECOMMENDATION

This decision document represents the selected removal action for the Railroad Salvage/ Griswold Cotton Mill Site in Montague, MA, developed in accordance with CERCLA, as amended, and is not inconsistent with the National Contingency Plan. The basis for this decision will be documented in the administrative record to be established for the Site.

Conditions at the Site meet the NCP §300.415 (b) (2) criteria for a removal action due to the following:

Actual or potential exposure to nearby human populations, animals, or the food chain from hazardous substances or pollutants or contaminants [§300.415(b)(2)(i)];

Weather conditions that may cause hazardous substances or pollutants or contaminants to migrate or be released [§300.415(b)(2)(v)];

Threat of fire or explosion [§300.415(b)(2)(vi)];

The availability of other appropriate Federal or State response mechanisms to respond to the release [§300.415(b)(2)(vii)];

I recommend that you approve the proposed removal action. The total extramural removal action project ceiling if approved will be \$1,895,000.

APPROVAL: _____

DATE: _____

DISAPPROVAL: _____

DATE: _____

² Direct Costs include direct extramural costs \$1,895,000 and direct intramural costs \$100,000. Indirect costs are calculated by using regional indirect rate in effect at time cost estimate is prepared and is expressed as a percentage of the direct costs 40.53% x \$1,995,000, consistent with EPA's full cost accounting methodology effective September 30, 2019. These estimates do not include pre-judgment interest, do not take into account other enforcement costs, including Department of Justice costs, and may be adjusted during the course of a removal action. The estimates are for illustrative purposes only and their use is not intended to create any rights for responsible parties. Neither the lack of a total cost estimate nor deviation of actual total costs from this estimate will affect the United States' right to cost recovery.

Scene: View of the Site Showing Standing Walls and Fire/Building Debris.

Google Maps 11 Power St



Imagery ©2020 Maxar Technologies, Map data ©2020 50 ft

Information Technology Budget Scenario with Full Time Staff Member

EXPENDITURES		Actual Spent FY20	Base Budget FY21	FY22 Scenario
5100	IT Administrator Stipend	2,100.00	2,100	
5111	IT Administrator			89,407
	TOTAL WAGES	2,100.00	2,100	89,407
5247	IT Consultant	45,472.50	44,000	7,500
	Professional Development			5,000
5341	Comcast/Crocker DSL Line	1,962.74	2,000	3,000
5346	Anti-Virus (prev Sp Art)see note	875.00	1,100	1,100
5347	Domain Hosting	400.00	400	400
5348	Website Hosting/Maintenance	675.00	600	800
5349	Website Address Reg/Security Cert	399.98	400	400
5350	Zoom licenses			1,500
5580	Miscellaneous Expenses	4,117.02	4,000	4,000
5590	Equipment <\$5K		7,500	10,000
	TOTAL EXPENSES	53,902.24	60,000	33,700
	TOTAL	56,002.24	62,100	123,107