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 Application

Narrative Information Sheet

Project Title:	**Strathmore Mill Cleanup**
Applicant:	**Town of Montague** **One Avenue A** **Turners Falls, MA 01376**
Grant Type:	**Single Site Cleanup**
Federal Funds Requested:	**$4,920,400**
Location:	**Turners Falls, Franklin County, Massachusetts**
Property Information:	**20 Canal Road** **Turners Falls, MA 01376**
Project Director:	**Walter Ramsey, Assistant Town Administrator** **One Avenue A Turners Falls, MA 01376** **413 863 3200x 126** **Assistant.townadmin@montague-ma.gov**
Highest Ranking Official:	**Richard Kuklewicz, Selectboard Chair** **413 863 3200x 110** **RichardK@montague-ma.gov**
Population:	**8,463 (2022 ACS)**

Other Factors	**Page #**
Community population is 10,000 or less.	**(1)**
Applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
Targeted brownfield sites are impacted by mine-scarred land	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation	
The proposed site is adjacent to a body of water	**(3)**
The proposed site is in a federally designated floodplain	**(3)**
The reuse of the proposed cleanup site will facilitate renewable energy from wind, solar, or geothermal energy	**(5)**

The reuse of the proposed cleanup site will incorporate energy efficiency measures	**(5)**
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments	**(5)**
The target area(s) is located within a community in which a coal-fired power plan has recently closed (2013 or later)	

Narrative Proposal for Cleanup Grant

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i. Overview of Brownfield Challenges and Description of Target Area: The Town of Montague is located in Franklin County, in Western Massachusetts, the most rural county in the State. The population was 8,463 as of the 2022. Montague is the second largest community in Franklin County and a principal economic and employment center. The Target Community, known as the Village of Turners Falls, is defined by Census Tract 407.01. Turners Falls is the largest village and thus this target area has the highest population and employment density in the Town. Turners Falls was a planned mill community on the Connecticut River- the largest river in New England. The river was dammed, and a canal was built in the 1860s to support rapid industrial growth. Pulp and paper were the predominant industry, but cutlery and cotton were also produced. The steady decline of traditional industry has left the community with 6 vastly underutilized and blighted riverfront mill sites in the "Canal District." In 2016 The Turners Falls Canal District was designated a "slum and blight" area by the Massachusetts Department of Housing and Community Development. The last operating paper mill in Turners Falls abruptly closed its doors in 2017, leaving 60 unemployed, which placed additional stress on the community, and marked the end of the industrial era. This application is to clean up Strathmore Mill. The Site is currently structurally unsound and at an acute risk of collapsing into the Connecticut River. By funding the cleanup of this property, EPA will not only remove blight, but will be the catalyst for the redevelopment of the Canal District, improve stormwater controls and fix the hydroelectric plant.

MassDEP identifies approximately fifty-seven (57) releases in Montague that are designated as brownfield sites according. More than 40 of those are located in the Target Area of Turners Falls. By far the most concentrated population of Brownfields is the Canal District, to which the Site is prominently situated in. This is the highest concentration of brownfields in Franklin County. The Canal District is dying. Over the last 15 years there have been two catastrophic fires in abandoned mill buildings in the Canal District, and the Strathmore Mill is close to collapse. The district and its brownfield sites have potential to become assets to the community but in their current state they are a true drain on community resources, safety and welfare. The scale of the brownfields problem is overwhelming for a community of just over 8,000 people.

1.a.ii. Description of the Proposed Brownfield Site: The Site to be cleaned up under this grant is a vacant riverfront paper mill complex known as Strathmore Mill. The subject site consists of 9 contiguous buildings which range in height from four to six stories. The two lower stories are below the elevation of the adjacent canal. The building has a footprint of approximately 55,000 square feet and was constructed in between 1874 and 1906 as a mill. Historically, mill operations included machining, stamping, forging, grinding, finishing, pulping, cutting, and bleaching. The complex has approximately 200,000 square feet in floor area and is serviced by town water and sewer.

The Town of Montague acquired the mill in 2010 through property tax foreclosure and it has become the primary redevelopment priority for the community given its riverfront access and proximity to downtown Turners Falls. In its current condition, the mill is in imminent risk of collapse, which could impact human life as well as the ecology of the Connecticut River.

The Site was initially listed with the DEP for the presence of arsenic and polyaromatic hydrocarbons (PAHs). A Phase I and Phase II (2004) which included soil and ground water testing did not indicate remediation was required at the site. A 2005 Hazardous materials survey indicated the presence of asbestos and hazardous building materials in the buildings at the mill complex such as TSI piping, flashing cement, transite boards, floor tiles, caulking, and glazing.

Although the Town has secured the property, it is inevitable that youth and vagrants enter the site, given the hundreds of potential access points. Several fires have occurred, at least one of which resulted in the release of ACMs to the environment. Workers and vagrants that enter the site are subject to exposure to hazardous materials. The condition of the Strathmore Site was major impediment to the redevelopment of the Turners Falls Paper Company property when it shut down in 2017.

The objective of the remediation is to remove a health and safety hazard and provide for reuse of the site as riverfront park. The site is currently owned by the Town of Montague, which took the property from Swift River Group via tax title, in February 2010. The parcel is located at 20 Canal Road in the Turners Falls section of the Town of Montague, Franklin County, Massachusetts and is zoned as Historic Industrial. According to the Montague Assessor's office, the site is listed as Map 2, Block 0, Lot 01.

According to a 2007 Site Feasibility Assessment by Finegold Alexander Associates, all of the nine buildings were found to be in "poor" or "fair" condition. Conditions have deteriorated significantly since the 2007 study. The 2023 Master Plan recommends full demolition by 2025. Sections of masonry are actively collapsed into the bank of the Connecticut River and the building has a vertical crack and is unsafe.

1.b. Revitalization of the Target Area

1.b.i. Reuse Strategy and Alignment with Revitalization Plans: The Turners Falls Canal District is comprised of 6 former mill sites on 16 acres along the Connecticut River. The river powered the mills for over a century and now powers one of the largest hydro power generation facilities in Massachusetts. The removal of the mill is one of the Town's top priorities identified in Montague's Municipal Vulnerabilities Prioritization Plan (2018). In 2023, the Town of Montague, with support from MassDevelopment and the Urban Agenda Program, developed a master plan vision to transform six acres of blighted industrial riverfront into an outdoor recreational amenity for an environmental justice (EJ) neighborhood. The plan identified ways to enhance the ecology of the Connecticut River while unlocking potential for renewable energy generation, light manufacturing, and housing development, and removing an unsafe condition, and allow for better stormwater controls.

Despite over 50 years of decline and disinvestment in the Canal District, leaving every property in the District vacant and blighted, Turners Falls is a resilient town that has redefined itself as a

walkable hub for culture and recreation in the CT River Valley. Massive public and private investment is planned. MassDOT has committed to reconstruct 3 of the bridges in the district and the hydropower utility Firstlight Power is committed to provide boatable recreation flows in the river with public launch amenities for the next 50 years. This presents a novel opportunity to expand tourism, recreation, and economic development.

With major public and private investments underway and planned in the core of the District, blight will make way for riverfront access as a pathway to revitalization in the north end of the district. The cleanup of this Site will help Turners Falls embrace the Connecticut River as opposed to turning its back on the river as it has done for most of its industrial history.

1.b.ii. Outcomes and Benefits of Reuse Strategy: The current unsafe condition of the mill is an environmental catastrophe waiting to happen. There have already been 2 catastrophic fires in the District in the past 15 years. Actively collapsing buildings pose an environmental and safety threat to the Connecticut River and the active Power Canal. The removal of the Strathmore Mill will directly benefit an EJ community that is seeing an increased demand for passive and active outdoor recreation, as well as provide stormwater mitigation to improve the ecology of the river.

The project will directly support the sustainability of the hydropower industry in Montague. Hydro power is the largest industry in Montague and this project will support two separate hydropower projects. Hydro is of strategic economic development importance to Montague and the Commonwealth as part of climate impact mitigation measures and energy resiliency. In addition, the project will allow for strormwater controls to be implemented to mitigate runoff. Benefits and Outcomes are summarized below:

- Removes blight in an EJ census tract.
- Restores riparian habitat in an ecologically rich location.
- Proactively prevents an environmental disaster through planned demolition.
- Facilitates stability of hydropower operations as a means for power generation and tax base stability
- Provides riverfront access for over 200 units of affordable housing that will help stimulate the economy in Turners Falls and the Target Area.
- Establishes a regional draw for tourism dependent Franklin County
- Establishes a dedicated space to honor local indigenous lives lost at this location

1.c. Strategy for Leveraging Resources

1.c.i. Resources Needed for Site Characterization: The Town has included funds in this grant request for a supplemental hazardous material inventory to confirm the extent of asbestos and hazardous materials to be abated. These data are part of the remedial design and needed to fine tune quantities. The grant will allow access to an area that will be assessed using state resources (such as MassDevelopment brownfield Program, PARC grant, for open space and potentially funding through Franklin Regional Council of Governments' (FRCOG's) assessment program.

1.c.ii. Resources Needed for Site Remediation: In 2019 the Town invested $350,000 into

abatement and remediation of interior hazardous materials in the complex, leaving ACM on the roof and windows. Now, with the structure's imminent failure, those ACMs that remained need to be remediated. While the Town is actively seeking funding from the State through an Environmental Bond Bill to demolish the mill, that could take years.

1.c.ii. Resources Needed for Site Reuse: The Town's objective is to demolish the buildings in the complex. The total expected cost of that is based on a 2023 estimate of $7,873,530. The hazardous materials abatement element is expected to cost $1,900,000. The Town is actively working with State and Federal partners to fund the remaining demolition costs.

1.c.i. Use of Existing Infrastructure: The site is located in an urban area with water, sewer, and electricity in the vicinity. The Town, through a settlement with FirstLight Power has an appropriation of $200,000 for the purpose of improving infrastructure (water, sewer) to the redeveloped site.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. Community Need for Funding: The Town of Montague and the Target community of Turners Falls have a significant concentration of people living in poverty. One out of every four people in the Target Community are living in poverty. The poverty rates in the Target Community are significantly higher than the Town, County, State and National averages. The median household income of the Target Community is $48,380 less than the state average and $69,021 less than the national average. Additionally, the Town of Montague experiences chronically higher rates of unemployment than the state and national average. Montague is not a wealthy community compared to others in MA.

Table 1: Demographic Information for Montague, Massachusetts

	Targeted Community- Census Tract 407.01	Town of Montague	Franklin County	Massachusetts	National
Population	3,968	8,565	71,085	6,991,852	333,287,562
Unemployment	6.2%	4.9%	5.5%	5.4%	5.5%
Poverty Rate Over last 12 months	10.3%	9.1%	10.6%	9.9%	12.6%
Percent Minority	17.1%	12%	13.8%	37.9%	49.3%
Median Household Income in past 12 months	$48,380	$65,925	$64,949	$89,026	$69,021
Percent of US Median household income	70%	95%	94%	129%	100%

Source: US Census Bureau's 2017-2021 ACS Five-Year Estimates

2.a.ii. Threats to Sensitive Populations

(1) Health or Welfare of Sensitive Populations : The Montague Housing Authority's Keith Apartment Complex houses 31 income restricted senior apartments and is less than 300 feet from the Site. Hundreds of cyclist's bike past the site daily on the Canalside Bike Path. The Franklin County Housing and Redevelopment Authority has offices 650 feet from the site. Besides employing over 30 people the Authority frequently services low-income clientele who walk to the property from downtown. Turners Falls has approximately 220 low-income public housing units, all less than 1,000 feet from the project site.

The cleanup of the Site will eliminate exposure of contaminants to the 31 low-income seniors living in public housing adjacent to the site, hundreds of daily users of the Canalside Rail Trail, the 30 plus employees of the Franklin County Housing and Redevelopment Authority. The removal of PCBs will eliminate potential exposure to PCBS that could cause cancer, as well as a variety of other adverse health effects on the immune system, reproductive system, nervous system, and endocrine system.

The removal of these contaminants from the riverfront removes a pollution source threatening residents and sensitive populations in Montague, Greenfield and every community downstream to Long Island Sound. The Mill in its current state is a deterrent to public access and recreational use of the river, which is a stated priory in Montague Comprehensive Plan and the Turners Falls Downtown Livability Plan. Consequently, the buildings along the Connecticut River are in the poorest condition and provided the most threat of collapsing directly into the river. The threat for direct release of ACMs and PCBs into the river will be eliminated.

In addition to health benefits, the welfare of the public will benefit greatly. The Turners Falls Canal District in particular is in a state of disrepair and has a recognizable pattern of disinvestment. A 2015 Slum and Blight Designation approved by the Town and the MA Department of Housing and Community Development determined the area to be blighted because 70% of the properties within the Canal District have experienced physical deterioration of buildings or improvements, abnormally low property values, chronic high vacancy rates, and known or suspected environmental contamination. Further, the public improvements throughout the area are in a general state of deterioration. Fifty-seven percent of the buildings in the study area have abnormally low property values and 41% of the buildings have been vacant for more than the last two years. In fact, 53% of the total square footage in the study area is vacant. These conditions contribute to the atmosphere of a distressed village of Turners Falls. These sites have attracted illegal dumping, vandalism, and arson.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions: There are numerous health risks associated with the friable deteriorating asbestos and other contaminants at the Strathmore Mill Site. While the lower 2 stories are being secured, there are open windows on the upper 3 floors that are causing contamination to the general area- affecting the senior housing complex that is only 300 feet away, users of the Canalside Bike Path, and the myriad rare species in the Connecticut River. At least 40% of Montague and target area residents can be classified as belonging to a sensitive population as indicated in the following table. As described before the mill is adjacent to a 31 unit low-income elderly housing complex. These residents are at most risk from exposure. The remediation of known contaminants at the Site is an important step toward protecting these sensitive populations from possible exposure to harmful contaminants.

Public health research indicates that poor educational outcomes are directly linked to brownfields-related conditions such as elevated lead levels and asthma. The major health risks attributed to asbestos exposure includes asbestosis, lung cancer, and mesothelioma. The table below shows the higher numbers of vulnerable residents in the target area.

Table 2: Percentage of Target Area and Montague Residents Belonging to a Sensitive Population		
	Targeted Community Census Tract 407.01	**Town of Montague**
Percent Minority	17.1%	12.0%
Over 65 Years Old	21.1%	19.6%
Children (under 18)	18.1%	17.9%
Poverty Rate	10.3%	9.1%
Source: US Census Bureau's 2017-2021 ACS Five-Year Estimates		

(3) Environmental Justice

(a) Identification of Environmental Justice Issues The Massachusetts Executive Office of Energy and Environmental Affairs recognizes the Turners Falls Target Area (Census Tract 407.01) as an EJ Neighborhood because the annual median household income is equal or less than 65% of the statewide median income. The highest concentration of brownfields in Franklin County is located within this EJ Neighborhood.

(b) Advancing Environmental Justice this EJ Neighborhood is at risk. By cleaning up this site in their neighborhood, the future development will offer new affordable housing opportunities and open space to a community that is currently underserved and plagued by blight.

2.b. Community Engagement

2.b.i. Project Involvement: The Town will lead outreach and presented this application and draft ABCA on November 6, 2023. The Town recently completed a Canal District Master Plan which included an extensive public engagement component that included surveys, focus groups, public workshops and participation from underrepresented stakeholder representing affordable housing and local youth. The major outcome of the study was decision to demolish the Strathmore Mill to make way for a riverfront park. The Town will make information readily available to the public through the Montague official website and Facebook page as well as collaboration with the **Connecticut River Conservancy** and their wide network. The town is supported by the following organizations:

Organization	Point of contact	Assistance Provided
Connecticut River Conservancy	Kelsey Wentling, kwentling@ctriver.org	Outreach, Advocacy, mailing list, host meetings
Franklin Regional council of Governments	Jessica Atwood jatwood@frcog.org	Assessment funding if needed, Redevelopment assistance

The Town will provide opportunities for public input and two-way communication to ensure the proposed cleanup activities are conducted in a manner that is protective of stakeholders. The Town will prepare a Community Involvement Plan (CIP) prior to any cleanup planning, which will set forth in greater detail how the community can be involved in the project. The project will include up to eight stakeholder meetings before, during and after the project. Methods of communicating with the public will be adjusted to ensure that they are appropriate and effective.

3. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

3.a. Proposed Cleanup Plan

The first step in the redevelopment of the Site is abatement and remediation. The Town has already received funding from the CDBG program to design and permit the selective demolition of approximately ½ the buildings following the completion of the proposed remediation project. However, given its terrible state of repair and unsafe condition, portions of this building will likely be demolished, and bulk loaded as ACM waste.

Proposed cleanup activities will include the abatement and off-site disposal of above-ground hazardous building materials and soil contamination. The Town will implement sustainable practices throughout the cleanup. First the Town will conduct limited asbestos, hazardous materials and PCB sampling to support the design. The cleanup will include the removal of 135,000 square feet of Asbestos impacted materials and 4,000 tons of contaminated soil. All cleanup activities will be conducted in accordance with the state's voluntary cleanup program know as the Massachusetts Contingency Plan (MCP). As required in Massachusetts, a Licensed Site Professional (LSP), who will serve as the QEP for the project, will be hired by the town to develop the remedial action plan and oversee cleanup and MCP response activities. The cleanup will create a safe site for open space and affordable housing.

3.b. Description of Tasks/ Activities and Outputs

a. Description of Tasks/Activities and Outputs

i. Project Implementation/ii. Anticipated Schedule/iii. Task Activity Lead/iv. Outputs

Task #1 – Cooperative Agreement Oversight
EPA funded tasks/activities: Manage and conduct cooperative agreement (CA) oversight activities which include: EPA Reporting (ACRES, MBE/WBE, FFR and Quarterly Reports, Close Out); Competitively procure and manage qualified environmental professional (QEP) and remediation contractors; Conduct financial reporting and drawdowns; Establish information repository, public website and maintain project files; Project coordination with stakeholders; Ensure program remains on schedule and budget. Travel/attend National Brownfields Conference and local events.
Non- EPA grant resources needed: Montague will provide in-kind services (in the form of staff time, travel, materials) for any additional activities not budgeted as part of this task.
Anticipated Project Schedule: These tasks will be completed over the four (4) year grant period. Montague expects to procure a QEP by November 30, 2024, and to kick off the program Dec 2024 / Jan 2025. Quarterly BAC mtgs. Quarterly reports will be submitted within 30 days of end of each quarter (Jan April/July/Oct), and MBE/WBE and FRR reports annually by Oct. 30 each grant year. ACRES will be updated upon grant award and at regular intervals as project cleanup and redevelopment milestones are achieved and/or new information available. Final closeout report will be submitted within 90-days after the end of the CA performance period (no later than 12/30/28).
Task/Activity Lead(s): Montague will lead CA oversight tasks to ensure compliance with Brownfields Programmatic Requirements. The QEP will provide technical support, as needed and provide updates to ACRES, quarterly and annual reports, and general programmatic assistance related tasks and activities.
Output(s): EPA Reporting (ACRES/DBE/FRR reports, 16 Quarterly Reports, Closeout Report), prepare Request For

Qualifications for QEP & remedial contractor procurement, drawdown requests, 16 BAC Meetings, general CA oversight and attend National Brownfields Conference and local brownfield events.
Task #2 - Community Outreach & Engagement
EPA funded tasks/activities: Town of Montague will establish a public repository at Town Hall and Local Library in Turners Falls. The town will designate a community spokesperson and will develop a CIP. The CIP will outline the steps to ensure adequate public notice and opportunity for the community to provide input / feedback on the proposed cleanup/reuse plan and solicit response to comments. Reports and other materials will also be posted to the Town's website. Public notice of the updated draft ABCA and CIP will be 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 comments will be provided and incorporated into the final CRP and ABCA. The town will establish its Steering committee to include project partners to maximize stakeholder engagement in the target area.
Non- EPA grant resources needed: The Town will provide in-kind services (staff time, mailings, postage, travel, materials, etc.) for any additional activities not budgeted as part of this task.
Anticipated Project Schedule: Outreach activities are anticipated commence in the Spring 2025 with the generation of the CIP and occur over the following three (3) years throughout project implementation, until cleanup related filed work is completed, estimated to be Spring 2028. Outreach anticipated to be conducted at the following project milestones: 1) ***Spring 2025***: Post CIP and present updated draft ABCA. 2) ***Spring 2026***: Pre-cleanup and to solicit feedback from the community regarding proposed redevelopment. 3) ***Fall 2027***: During Cleanup to discuss status of remediation and reuse planning update. 4) ***Spring 2028***: Post cleanup and next steps.
Task/Activity Lead(s): Montague will lead community engagement activities. QEP will be the town's partner and generate the CIP and ABCA, provide technical expertise and support at meetings, including translation services if required. The town will review deliverables to ensure compliance with Brownfields Programmatic Requirements.
Output(s): Outreach materials, website updates, public notices, meeting presentation materials, social media posts. Eight (8) meetings with community, stakeholders and/or public meetings.
Task #3 – Site Specific Cleanup Activities
EPA funded tasks/activities: QEP will prepare documentation required for cleanup implementation, including a Health and Safety Plan (HASP), Quality Assurance Project Plan (QAPP), Remediation / Engineering Plans & Specifications, and MCP/VCP required documents and Remedial Action Plans. The grant will fund a public bid package, with support from QEP, for the procurement of a cleanup contractor. QEP will support the town with bidding assistance. Cleanup contractor will implement cleanup tasks with oversight from QEP.
Non- EPA grant resources needed: Montague will provide in-kind services (staff time & materials) for any additional support activities not budgeted as part of this task. If necessary, town will apply for supplemental funds from MassDevelopment and/or MassDEP and/or other resources.
Anticipated Project Schedule: ***Spring 2025***: Coordination with potential developer to ensure final cleanup plan supports site reuse design features. ***Spring to Winter 2025:*** Generate cleanup plans, remediation / engineering designs and specifications, issue invitation for bids for cleanup contractor. ***Winter 2025 to Spring 2026:*** award cleanup contractor, secure permits. ***Spring/Summer 2026***: Commence site remediation. ***Spring/Summer 2027*****:** Complete site remediation related field tasks.
Task/Activity Lead(s): Montague will procure the cleanup contractor. QEP will prepare ABCA, QAPP, MCP/VCP reports and remedial engineering plans & specifications. Montague will review deliverables to ensure compliance state/federal Brownfields requirements. Cleanup contractor will obtain permits and implement specified cleanup tasks with QEP support / oversight.
Output(s): HASP, QAPP, MCP/VCP report(s), remedial engineering plans & specifications, site remediation & restoration. Removal of 135 square feet of asbestos impacted demolition debris, and removal of 4,000 tons of sub slab impacted soil. Prepare site so that the Risk to reuse is eliminated or mitigated sufficiently.
Task #4 - Site Cleanup Oversight and Cleanup/Completion Reports
EPA funded tasks/activities: During site remediation, the QEP will perform observation activities and document activities in the field to ensure cleanup is performed in compliance with the EPA approved ABCA and the MCP / state VCP requirements. The QEP will prepare and submit state required Remedial Action Plan, Status and Cleanup Completion reports to the MassDEP and EPA. The QEP will oversee construction to ensure consistency

with the drawings and specifications. Site will be surveyed for as-built plan and institutional controls if an Activity and Use Limitation (AUL) is required for site closure. QEP will issue closure report to MassDEP and EPA.
Non- EPA grant resources needed: Montague will provide in-kind services (staff time, travel, materials) for additional activities not budgeted as part of this task.
Anticipated Project Schedule: Cleanup activities and oversight are expected to occur ***Spring/Summer 2026 – Spring/Summer 2027***. Final documentation and Cleanup Completion report is anticipated in ***Spring 2028***.
Task/Activity Lead(s): QEP will provide technical oversight, and document remedial activities for compliance with applicable MassDEP/EPA standards & requirements. AUL (if needed) with be recorded at Registry of Deeds.
Output(s): Bills of Lading/Manifest, Remedial Action Plan, three (3) Status Reports, and Cleanup Completion & Closure Report. AUL. Regulatory closure under MCP/VCP through a Permanent Solution Statement

3.c Cost Estimates

a. Cost Estimates

The Town is requesting $4,920,375 to be used to complete the tasks above. Costs have been estimated based upon past experience and estimates from environmental contractors and in consultation with the EPA's Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance guidelines. *Please note, no fringe, indirect, equipment or supply costs are requested*. **Task 1:** Personnel = $5,000 (~1.5hrs/mo x 48 mo x $65/hr); Travel: $5,000 Brownfield Conferences – 2 attendees (air travel, lodging, per diem = $1,500/pp for national conference + $1,000/pp for mileage/hotel/per diem for local events). Contractual = $30,000 [General Cooperative Agreement Assistance, Quarterly Reports (16) and ACRES updates (~5hrs/mo x 44 mo @ $135/hr average)]. **Task 2:** Personnel = $7,500 (115hrs x $65/hr); Contractual = $25,000 [QEP (~$2,000/mtg x 8 public / stakeholder meetings) + $6,000 for CRP and ABCA + $3,000 for production of outreach materials (22 hrs @ $135/hr average). **Task 3:** Personnel = $7,500 for review of documents, coordination for bidding (115hrs x $65/hr); Contractual: $150,000 [QEP =1035 hrs @ $145/hr average for: HASP, QAPP, Remediation/Engineering Plans & Specifications, and MCP/VCP required documents and Remedial Action Plans]; Construction: Remediation Contractor $4,499,375 *[$2,025,000 in bulk loadout of contaminated materials, $500,000 in soil remediation, $586,875 in mobilization, contingency, site security, utilities, etc. plus $1,320,000 in cover system construction and site restoration* {includes geotextile barrier, import and placement clean material, erosion and stormwater management controls, retaining wall stabilization, loam, grading, seeding). **Task 4**: Personnel = $6,000 (~92hrs x $65/hr); Contractual = $185,000 [QEP = 1050hrs @ $120/hr average) plus $59,000 for 3rd party asbestos air monitoring survey.

Budget Categories		**Project Tasks ($)**				
		Cooperative Agreement Oversight	Community Engagement	Site Specific Cleanup Activities	Cleanup Oversight & Report	**Total**
Direct Costs	Personnel	$5,000	$7,500	$7,500	$6,000	$26,000
	Fringe Benefits					
	Travel[1]	$5,000				$5,000
	Equipment[2]					
	Supplies					
	Contractual	$30,000	$25,000	$150,000	$185,000	$410,000
	Construction[3]			$4,499,375		$4,499,375
	Other (include subawards)					

Total Direct Costs[4]	$40,000	$32,500	$4,656,875	$191,000	$4,920,375
Indirect Costs[4]					
Total Budget	$40,000	$32,500	$4,656,875	$191,000	$4,920,375

All contracts entered into by the applicant with third parties will be in compliance with 40 CFR31.36 and remediation contractor via MGL Chapter 140 and applicable state procurement laws with Massachusetts Prevailing wage and/or Davis Bacon Wage Rates (whichever is higher).

3.d. Plan to Measure and Evaluate Environmental Progress and Results

The town will track and measure progress with support from the QEP, based on progress reports and monthly invoicing with back up. The Project Manager will utilize project management software to track timelines, expenditures, and project progress. Data, and costs will be entered into ACRES as well as long-term outcomes such as the number of jobs created, funding leveraged, the number of acres made ready for reuse, and volume of soil remediated. The town will track project progress versus the proposed schedule. Reports prepared to satisfy state VCP requirements will further document cleanup activities and the effectiveness of the selected remedial action.

Outputs:

- A cleanup plan and scope of work that incorporates community comments, concerns, and suggestions including at least one community meeting.
- Obtaining funding commitments for all funds necessary to complete the cleanup.
- Cleanup by a target date of March 1, 2025.
- Submission of all required reporting until achievement of final closeout

Outcomes:

- An environmentally clean site and river.
- Facilitate creation of riverfront riparian restoration area and public access
- Elimination of exposure routes to target area residents including 31 income restricted senior apartments adjacent to the site

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

4.a. Programmatic Capability

The Town of Montague has a three member Selectboard with the authority to execute grants, expend appropriations, and enter into contracts for services. The project will be managed by The Selectboard Office through the Assistant Town Administrator Walter Ramsey. He will be responsible for the administration, procurement, and reporting requirements of the grant. He is accredited with American Institute of Certified Planners. He has managed about 20 state and federal grants on behalf of the Town of Montague totaling over $10M. He is the Town's representative for the FRCOG's Brownfields Committee In 2017 he managed Mass Development Brownfields Cleanup Grant. The Town of Montague has a history of successfully managing many millions of dollars through state and federal programs and has never had any adverse audit findings. The Town's Chief Procurement Officer is Town Administrator Steve Ellis. He is a Massachusetts Certified Public Purchasing Official and will procurement the QEP and remediation contractors.

4.b. Past Performance and Accomplishments

4b.ii Has Not Received an EPA Brownfield Grant but has Received Other Federal non-Federal Assistance Agreements

MassDevelopment Brownfields Fund Grant- $250,000: The purpose of this grant was to abate select interior hazardous materials of the Strathmore Mill Complex. All work was completed on time and under budget. Completion date was December 2021. The Town provided $132,000 in local funding. The town employed an LSP to oversee the project. Walter Ramsey, Town Planner was the grant manager which included quarterly reporting, reimbursement requests, and preparing documentation for final certification.

Community Development Block Grant Program- Community Development Fund: The Town of Montague has secured a CDBG grant every year since 2010. The Town subcontracts with the Franklin Regional Housing and Redevelopment Authority to manage the grant program on behalf of the Town. Montague is a non-entitlement community, meaning the Town competes for funding each year. Montague has never received any adverse audit findings. The program is extremely well managed, as indicated by the successful track record of securing these critical grants. Most notably, the program in recent years has provided for implementation of Avenue A Streetscape Enhancement Program Phase I and II and the reconstruction of Unity Park in Turners Falls.

Threshold Criteria for Cleanup Grant

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 C

Letter from MassDEP

MassDEP
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

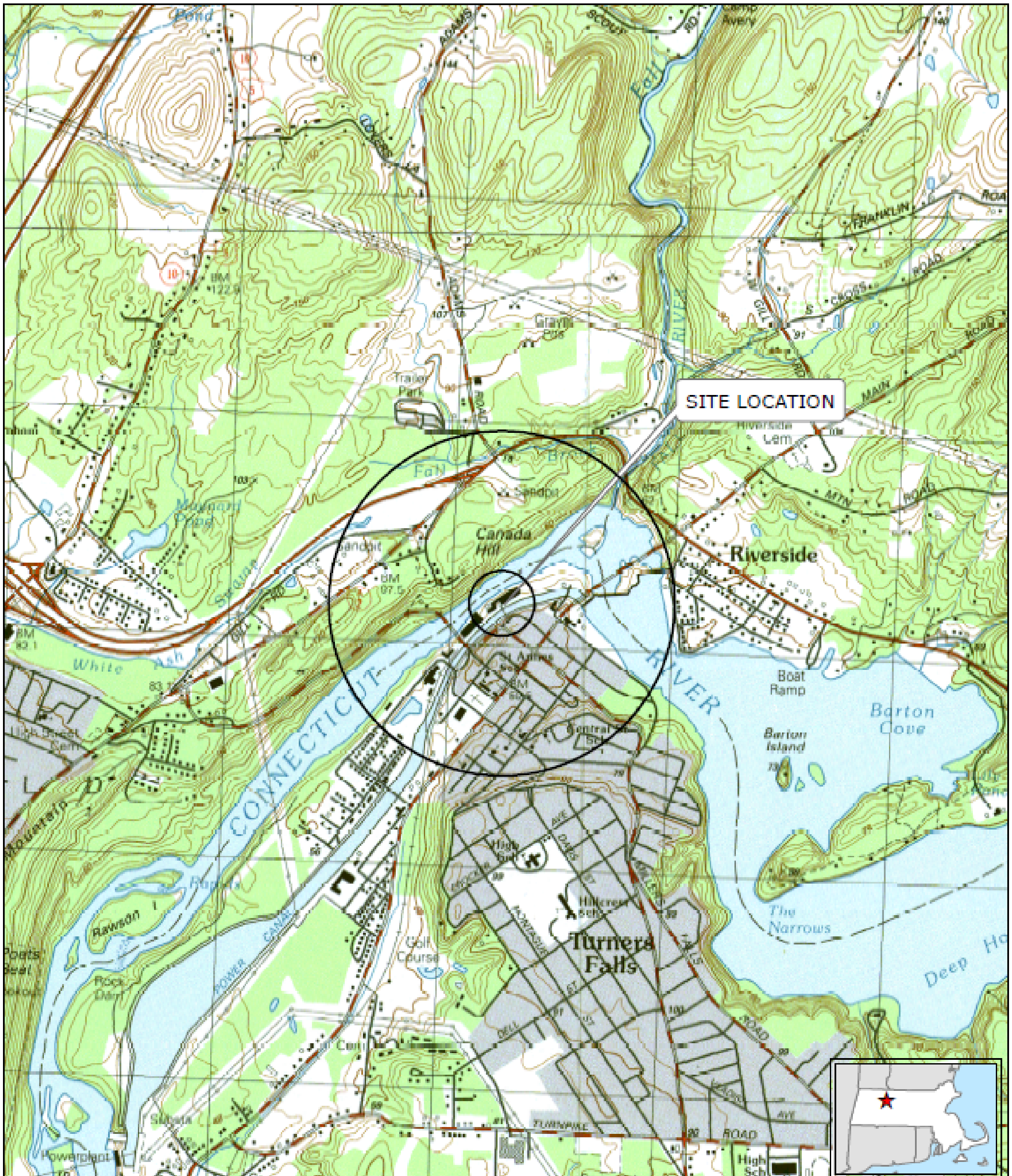

FIGURE 1
SITE LOCATION MAP

Strathmore Mill
20 Canal Road
Montague, MA

April 2013

Tighe&Bond
Consulting Engineers
Environmental Specialists

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

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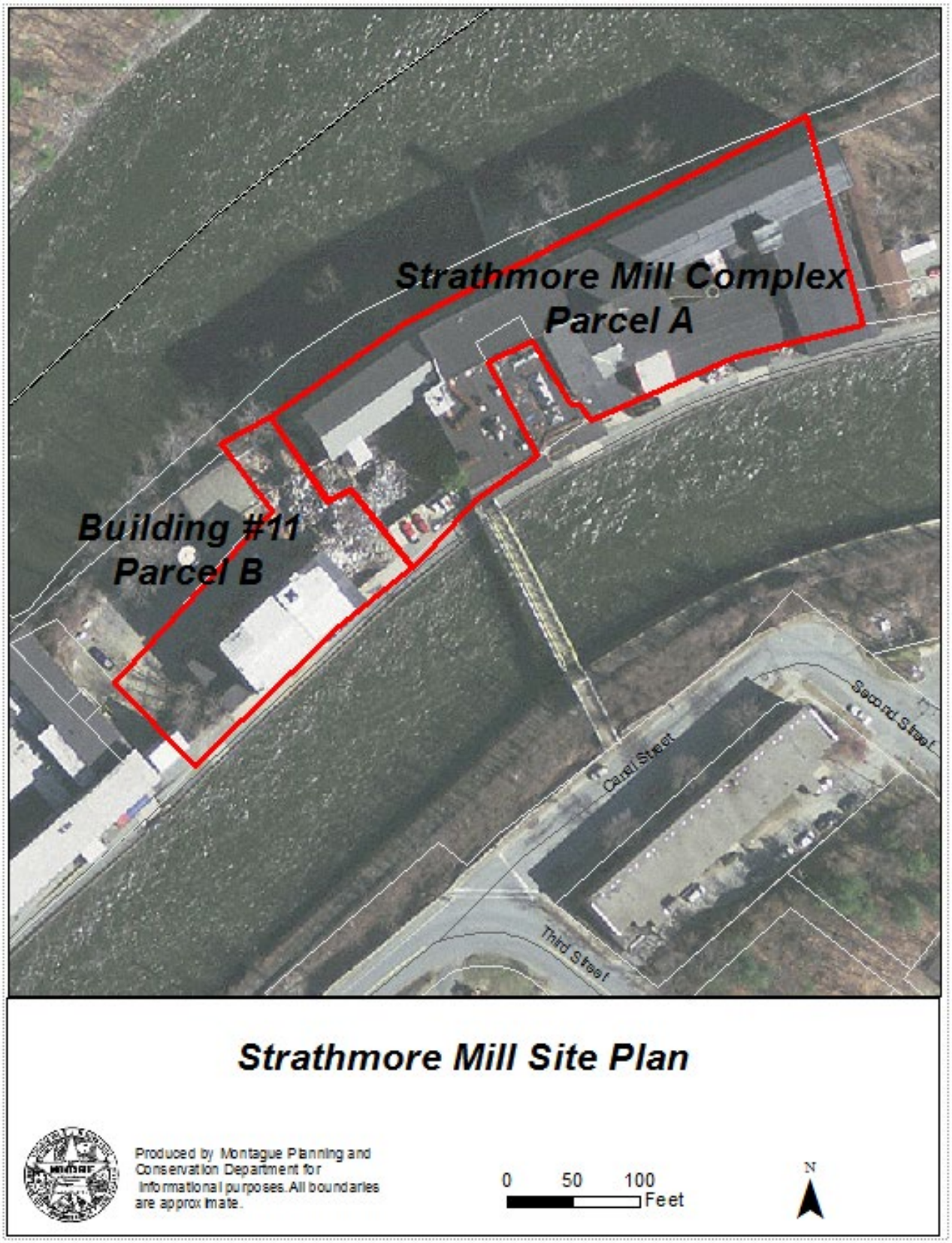
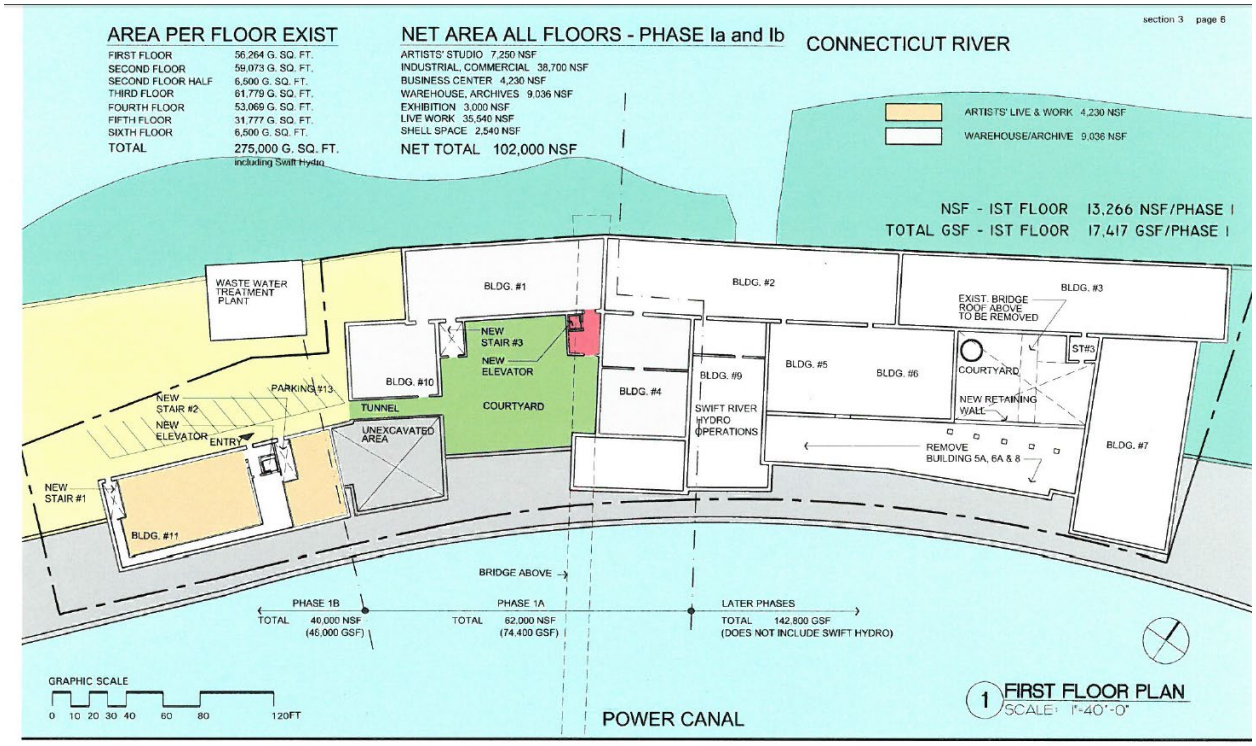
F-0137


Strathmore Mill Complex
Parcel A
Building #11
Parcel B
Second Street
Canal Street
Third Street
Strathmore Mill Site Plan
Produced by Montague Planning and Conservation Department for Informational purposes. All boundaries are approximate.
0 50 100
Feet
N


section 3 page 6
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
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
PARKING #13
NEW STAIR #2
NEW ELEVATOR
ENTRY
TUNNEL
COURTYARD
UNEXCAVATED AREA
BLDG. #4
BLDG. #9
SWIFT RIVER HYDRO OPERATIONS
BLDG. #5
BLDG. #6
COURTYARD
ST#3
NEW RETAINING WALL
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

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 E

Ability to Leverage

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

ATTACHMENT F

Letters of Commitment

Connecticut River Conservancy

Clean water. Healthy habitat. Thriving communities.

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

October 19, 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,

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

Andrea F. Donlon
Massachusetts River Steward

Franklin Regional Council of Governments

October 5, 2017

Walter Ramsey, Town Planner
Town of Montague
1 Avenue A
Turners Falls, MA 01376

Dear Mr. Ramsey:

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 cleanup of the former Strathmore Mill at 20 Canal Road, Turners Falls, MA. The FRCOG is a strong advocate for the cleanup and redevelopment of this site and the revitalization of this community. The cleanup of contaminated sites and their return to productive use are top goals in the 2013 Regional Plan for Sustainable Development for Franklin County, and the 2015 Greater Franklin County Comprehensive Economic Development Strategy (CEDS) Five-year Plan. In both plans, the Strathmore Mill project is highlighted due to its regional importance.

There is movement to invest and re-energize the village of Turners Falls, an economic distressed community. However, this site remains a significant blight and hazard. The cleanup and redevelopment of this property will provide an excellent opportunity to create a mix of residential, commercial, and/or light industrial space, and contribute to this revitalization.

Over the last 18 years, the FRCOG has received six EPA assessment grants and operated an EPA-funded Brownfields Cleanup Revolving Loan Fund. As part of our agreement oversight experience, we use EPA's online ACRES system to maintain records for brownfield sites, including the former Strathmore Mill site.

We commit to work with the Town of Montague on this cleanup project by having FRCOG staff update the project's ACRES record. FRCOG staff will input data into ACRES on behalf of the Town for this project in a consistent and timely manner. In addition, FRCOG staff will support 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 participate in project public information sessions to review potential resources for site redevelopment.

We look forward to continuing to work with you and the Town on this important project. If there are any questions or comments, please contact me at 413-774-3167 x133 or psloan@frcog.org.

Sincerely,

Peggy Sloan, Director of Planning & Development

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

ATTACHMENT G

Community Notification

ATTACHMENT H

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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