

DRAFT COMMUNITY INVOLVEMENT PLAN

STRATHMORE MILL

SITE CLEANUP PROJECT

20 Canal Road

Turners Falls (Montague), Massachusetts

With Funding from US EPA Brownfield Cleanup Grant

OVERVIEW OF COMMUNITY INVOLVEMENT PLAN

Purpose: The purpose of the Community Involvement Plan (CIP) is to describe the outreach strategy for the cleanup project involving the property known as the former Strathmore Mill (the Site), which will be employed by the Town of Montague (the Town) as the current owner of the Site. This project is being funded, in part, by a Brownfields Cleanup Grant which was awarded by the United States Environmental Protection Agency (US EPA) and is being administered by the Town of Montague. The Town has selected an environmental consulting firm, Tighe & Bond, that is completing project design and permitting for the proper abatement, demolition, and cleanup of the abandoned mill building complex in preparation for the creation of a safe Site for riverfront open space.

The former paper mill Site has a documented release history regulated under the Massachusetts Contingency Plan (MCP) at 310 CMR 40.0000. Response actions to address those earlier releases to the environment were completed and the releases were closed out with Permanent Solutions in accordance with the MCP. Subsequent subsurface investigations have indicated that the remaining impacts to the environment at the Site do not warrant further remediation. However, building materials and/or equipment containing asbestos and other hazardous materials, as well as hazardous waste debris are present in the buildings, with some asbestos containing materials (ACM) also present on the exterior portions of the buildings. With the dilapidated state of the abandoned buildings, this is a potential threat to human health and the environment.

As part of the preparation for future redevelopment, the Town will undertake cleanup of the Site through the following: 1) proper abatement of ACM, hazardous building materials, and other hazardous waste in preparation for the demolition of the mill complex; and 2) the segregation and crushing of the mill complex's painted/coated brick and concrete (which contains low level contaminants) for beneficial reuse as backfill in the lower levels/basement areas of the of the building complex and capped with clean soils. The

reuse of this regulated material will be under a Beneficial Use Determination (BUD) permit to be issued by the Massachusetts Department of Environmental Protection (MassDEP) Solid Waste Division in accordance with 310 CMR 19.060. This cleanup approach will significantly limit the amount of materials to be disposed at off-site receiving facilities and the volume of “new” clean backfill needed, and correspondingly it will reduce the number of trucks to and from the Site during this project.

As one of the public involvement requirements of the Brownfields Cleanup Grant, this CIP outlines how the Town will involve the public, particularly potentially affected residents, nearby business owners, and local community-based organizations in the decision-making process regarding the environmental cleanup at the Site. The success of this cleanup project will be improved by addressing stakeholder concerns through the CIP process.

The goals of the project are to remove blight, protect human health, and prevent an ecological disaster with the condition of the mill building likely to collapse and impact the abutting Connecticut River. These goals will be achieved through the cleanup of the Site for the creation of open space to serve this Environmental Justice Neighborhood.

SPOKESPERSON AND INFORMATION REPOSITORY

The spokesperson for this project is Mr. Christopher Nolan-Zeller, Assistant Town Administrator, Town of Montague, who may be contacted at:

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Turners Falls, MA

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The Information Repository is located at Montague Town Hall, 1 Avenue A, Turners Falls, Massachusetts 01376. To conduct a review of the Information Repository, please contact the Assistant Town Administrator during business hours: Monday, Tuesday, and Thursday: 8:30am to 5:30pm, Wednesday 8:30am to 6:30pm, 413-863-3200 x109. All project related documents are also available for public review on the Town of Montague’s project website, <https://montague-ma.gov/p/1560/>.

SITE DESCRIPTION AND HISTORY

This section summarizes the Site, its location, history and previous environmental investigations.

Site Location

The Site is located at 20 Canal Road. The Site parcel encompasses approximately 1.9-acres and contains a mill building complex located between the Power canal on the south side and the Connecticut River on the north side. The Connecticut River is topographically lower than the power canal (by close to 30 feet) and the head differential has been used to power the mill since its construction in the 1800s. The mill complex consists of eight interconnected buildings (referred to as Buildings #1 through #8), and another separate building referred to as Building #11, ranging in size between four and seven stories. There was a former interconnected building between Buildings #1 and #11 (previously referred to as Building #10) that was destroyed by a fire in 2007 and subsequently demolished. Also as part of the former Strathmore Mill complex, there's another interconnected building (referred to as Building #9) which houses a hydroelectric generating plant. This occupied Building #9 is situated between (and shares supporting walls with) Buildings #5, #2, and #4, but is located on a separate parcel of land not owned by the Town.

The subject mill buildings are in an advanced state of disrepair and are currently unsafe. In some building areas adjacent to the Connecticut River, there are cracks in the exterior walls that extend a number of stories and numerous windows are broken and open to the environment. ACM and other hazardous materials that are present throughout the abandoned buildings have the potential to be exposed to the atmosphere and nearby receptors. The abandoned buildings require proper abatement, demolition, and cleanup which is the focus of this project.

Site History

Operations and Ownership

The Site is a former paper mill, with earlier cutlery operations also documented at the Site. The existing buildings of the Strathmore Mill Complex were constructed between 1877 and the early 1900s for the Keith Paper Company. Industrial use of the Site (and surrounding area) pre-dates 1877, when the Keith Paper Mill Complex was destroyed by fire, but was rebuilt soon thereafter. Expansions of the mill complex occurred between 1893 and 1896, doubling the manufacturing production output. Historically, mill operations included machining, stamping, forging, grinding, finishing, pulping, cutting, and bleaching. The mill complex has over 200,000 square feet in floor area.

The Town of Montague is currently the sole owner of the property. 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.

Site Investigations

Numerous studies and environmental investigations of the Site have been conducted by various engineers, environmental consultants, and 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 Building Materials (HBM) Surveys (2005 through current) - 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
- Visioning Phase Report for the Canal District Master Plan (2023) - Dietz & Company Architects
- Removal Program Preliminary Assessment/Site Investigation (2024) - prepared for EPA by Weston Solutions

Some of these studies evaluated the viability of, and the challenges associated with, renovating the former Strathmore Mill building complex (or portions thereof) for reuse. With no redevelopment plans moving forward over the years, and with the dilapidated state of the abandoned buildings as further documented in Dietz's 2023 report, building demolition and restoration of the Site to future naturalized parkland use was considered the most suitable redevelopment option.

The Site has been subject of reportable release incidents identified under Release Tracking Numbers (RTN) 1-15175, 1-13843, and 1-16634 issued to the Site by MassDEP. Those releases from the early 2000s (as well as from pre-MCP 1990s spill incidents) involved documented impacts to the environment by petroleum-related compounds, heavy metals, PAHs, and/or paper making chemicals. Response actions and risk characterizations were completed for each of the RTNs, which were closed out with Permanent Solutions in accordance with the MCP. Subsurface investigations conducted at the Site under an EPA-funded Brownfields Assessment Grant in 2013 indicated that the remaining impacts to the environment (i.e., Site soils) do not warrant further remediation. However, building materials and/or equipment containing asbestos, oils, polychlorinated biphenyls (PCBs),

lead-based paint and other heavy metals are present on the interior portions of the buildings, and there is miscellaneous debris present on some floor areas that contain hazardous waste. Some ACM is also present on the exterior portions of the buildings.

Regulatory Obligations

Currently, there are no “MCP” cleanup obligations for the Site. However, this project will be overseen by a Commonwealth of Massachusetts Licensed Site Professional (LSP) in accordance with Massachusetts General Law Chapter 21E and the MCP. Therefore, should a new “release” to the environment be encountered during this project requiring reporting to MassDEP and/or if contaminated soil is generated and/or require off-site disposal as part of this project, a Tighe & Bond LSP will oversee those actions.

In preparation for and/or in conjunction with the scheduled mill buildings demolition, the proper abatement and disposal of the ACM is regulated by Massachusetts Department of Labor Standards 454 CMR 28.00 and by MassDEP under 310 CMR 7.00, and 310 CMR 19.000 regulations, as well as by Federal regulations. The removal and proper disposal of oil and hazardous materials (OHM) is regulated by MassDEP under 310 CMR 30.000 regulations, as well as Federal regulations. For ACM that cannot be “traditionally” or properly abated without some level of select demolition also occurring (e.g., some roof areas) a Non-Traditional Work Plan will be filed by the Contractor for review and approval by MassDEP’s Bureau of Air and Waste. The cleanup submittals will include identification of disposal facilities licensed to accept ACM and impacted building debris. The disposal facilities for ACM and other hazardous building materials and OHM will be identified during the design and contractor selection phase.

In accordance with 310 CMR 16.00 – Site Assignment Regulations for Solid Waste Facilities, certain recycling operations or activities do not require a solid waste site assignment. These exempt recycling operations include uncoated Asphalt, Brick and Concrete (ABC) Recycling Operations (310 CMR 16.05(3e)) when the ABC rubble generated from a demolition project is processed and reused at the site of generation. When the ABC is crushed in accordance with this regulatory provision, it is no longer considered a solid waste and may be used as a substitute for stone or aggregate construction material. For this project, a BUD permit application under “Category 3 – Restricted Applications” will be needed for the painted/coated building ABC materials (mostly brick for this Site) that are proposed to be used as backfill. The unpainted/uncoated ABC (mostly concrete for this Site) can also be properly processed and reused as backfill. The use of these secondary materials for backfilling of the Site, with three feet of clean capping material placed over the processed materials, is beneficial for this project for two reasons: 1) it will significantly limit the amount of materials to be disposed off-site and the volume of backfill needed,

and 2) correspondingly it will reduce the number of trucks to and from the Site. It will also pose insignificant potential hazard to public health, safety and the environment, per 310 CMR 16.00.

Other permitting that will be triggered for this project include a wetland permit under 310 CMR 10.00, and there will be determination filings for the Project to Massachusetts Historical Commission and Montague Historical Commission, as well as to Natural Heritage & Endangered Species Program under the Massachusetts Endangered Species Act.

Nature of Threat to Public Health and Environment

In its current condition, the former mill complex is in imminent risk of collapse, which could impact human life as well as the ecology of the Connecticut River. To address short term risks during demolition and cleanup activities, implementation of engineering controls will include dust controls, dust monitoring, and control of storm water runoff.

The cleanup of the Site will eliminate potential exposure to contaminants and other hazards 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 to the 31 low-income seniors living in public housing adjacent to the Site, along with hundreds of daily users of the Canalside Rail Trail. The cleanup of the Site with demolition of the dilapidated buildings along this riverfront property also 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 priority in Montague Comprehensive Plan and the Turners Falls Downtown Livability Plan. Consequently, the five-story buildings that immediately abut Connecticut River are in the poorest condition and are at the greatest threat of collapsing directly into the river. The potential threat for a direct release of contaminants into the river will be eliminated.

COMMUNITY BACKGROUND

Community Profile

Montague is located in Franklin County, in Western Massachusetts, the most rural county in the State. The population was 8,463 as of 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.

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 national average and \$69,021 less than the state average. Additionally, Census Tract 407.01 experiences chronically higher rates of unemployment than the state and national average. Montague is not a wealthy community compared to others in Massachusetts.

Chronology of Community Involvement

The Town has led outreach efforts and presented its EPA Brownfields Cleanup Grant application and draft Analysis of Brownfield Cleanup Alternatives (ABCA) on November 6, 2023. The Town additionally completed a Canal District Master Plan in 2022 which included an extensive public engagement component that included surveys, focus groups, public workshops and participation from underrepresented stakeholders representing affordable housing and local youth. The major outcome of the study was the 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, the Franklin Regional Council of Governments, and their wide networks.

Key Community Concerns

Concerns from the community received in comment or discussed to date include mitigation of public health risks posed by the continued presence of the industrial pollutants that remain at the site. Support for removal of the structures has been widespread.

Another community concern has been how the Town will honor the neighborhood’s industrial heritage once the mill complex has been demolished. It was explained that the

Town will consider a commemorative public art fixture and/or historical marker plaques identifying the Site where the mill stood.

CONTINUED COMMUNITY INVOLVEMENT

A draft ABCA for the project was made available to the public for review and comment in October 2023. The final draft ABCA will again be made available for review for a thirty (30) day period in May 2026, as described below.

Task	Estimated Start Date	Estimated Completion Date
Publish Public Notice in the Montague Reporter and Town website, which will announce public meeting, timing of 30-day public comment period, and availability of information repository.	April 30, 2026	April 30, 2026
30-day Public Comment Period for Draft ABCA	April 30, 2026	May 30, 2026
Public Meeting to discuss ABCA	May 11, 2026	May 11, 2026
Respond to Comments	May 6, 2026	May 30, 2026
Finalization of ABCA	May 26, 2026	June 3, 2026
Implementation of Remedial Alternative	November 2026	August 2028

Public Comments and Questions

The project will be presented at the public meeting by representatives from the Town and Tighe & Bond tentatively scheduled on May 11, 2026. The Town and Tighe & Bond will answer questions related to the Site history, cleanup, and regulatory closure process. Meeting attendance, feedback, and questions will be recorded and made part of the updated CIP and ABCA, as appropriate.