

Summary of Previous Assessment & Remediation Activities

Site History

In 2002 and 2005 the Town of Franklin obtained by foreclosure via tax title two parcels (Assessor's Map 276, Lots 022 and 027) at 87 Grove Street known as the former Nu-Style property. When acquired, the two parcels (totaling 53,190 sf [1.22+/- acres]) each contained a former industrial building. Both buildings were condemned in October 2005. The two buildings were once part of a larger mill complex that contained as many as six buildings.

The larger of the two buildings (Building I), which was a two-story building with a footprint of 12,046+/- sf, was demolished by the Town in 2012 as part of an EPA funded brownfields remediation project.

The remaining Town owned building (Building II) is adjacent to Mine Brook on the west side of the property. Originally built in 1945 the building has had at least two additions, one of which joined Building II to an adjacent former Nu-Style building, which is currently privately owned. The former manufacturing facility is a 4,000+ sf one and one-half story building, which is dilapidated, unsafe, blight on the neighborhood, and presents a risk to public health and safety. In 2014 substantial portions of the building collapsed; at that time the site was fenced to limit exposure and enhance safety.

The site had a long manufacturing history (at least 90 years), including textiles and costume jewelry. The buildings were historically occupied by Norfolk Woolen Mills, Unionville Woolen Mills, Franklin Paint Company, and most recently by Nu-Style Company and Image Jewelry. Materials used and stored at the site associated with jewelry manufacturing include cyanides, metals, chlorinated solvents, and petroleum products. Additional substances associated with textile manufacturing were also likely used. Use of oil and hazardous materials ceased at the property in 1989.

Starting in 2006 the Town worked to assess, remediate and redevelop the property. A substantial amount of assessment activities have been conducted to characterize the nature and extent of releases and hazardous building materials at the Town owned Nu-Style Property. The primary environmental concerns at the site are as follows:

- Chlorinated volatile organic compounds (VOC) including TCE and PCE in shallow overburden groundwater
- Chlorinated VOC in groundwater in the bedrock aquifer
- Polycyclic aromatic hydrocarbon (PAH) compounds in soil
- PAH compounds in sediment
- Hazardous building materials including lead and asbestos in the building structures.

The assessment activities mentioned above showed that the majority of the Town's Nu-Style property to the south of Mine Brook was "primarily used for parking and available documentation indicates that no industrial processes occurred on this portion of the Site". Franklin's LSP, Tata & Howard, completed a related assessment document, *Permanent Solution with Conditions - Partial*, in October 2015. The Town's LSP "is of the opinion that a condition of No Significant Risk has been achieved at the Property. "The sources of the release, which are the former manufacturing operations at other areas of the Site, have been terminated and the concentrations of CVOCs in the monitoring wells... have been reduced to background". In addition, an Activity and Use Limitation is not required to maintain the condition of No Significant Risk.

For these reasons the Town decided to separate the relatively clean portion of the property south of Mine Brook from the rest of the former manufacturing property. In December 2015 the Town submitted a plan to Franklin Planning Board for endorsement, which changed the boundaries of lots 022 and 027, created one parcel south of Mine Brook (17,267+/- sf) and a second parcel (35,923+/- sf) mostly north of Mine Brook (see ANR Plan in Attachment B). The parcel south of Mine Brook noted as Lot 2 on the ANR Plan (currently Parcel #276-027-000) was sold during 2016.

The remainder of the Town's former Nu-Style property (currently Parcel #276-022-000), noted in the ANR Plan as **Lot I**, is the subject of this RFP document; this property includes all of the former Lot 22, and more than half of the former Lot 27. The boundaries of Lot 1 have been highlighted in black on the ANR Plan; the location of Building II, which needs to be demolished, is highlighted in red.

Description of Previous Assessment Activities

During 2006 and 2008 the Town of Franklin in partnership with Norfolk County and their LSP contractor conducted Phase I and Phase II assessments of the site. The work was performed using EPA grant funding. The assessment activities between 2006 and 2008 included sediment samples, surface water samples, soil samples, and three groundwater monitoring events on the whole Town owned Nu-Style property.

The majority of contamination at the Nu-Style property was found to be primarily north of Mine Brook, adjacent to and within the footprint of Building I, and was the focus of the majority of previous assessment and remediation work, which included demolition of Building I and removal of over 500 tons of contaminated soil and other materials. For those reasons the focus of the Town's Phase II assessment activities since 2008 has been on former Lot 27.

However, at least some of the more recent sampling was performed on the former Lot 22, which is the western one third of the new Lot 1 and location of Building II; Phase I and Phase II environmental assessment activities performed that include portions of Lot 1 near Building II Include: Phase I Environmental Site Assessments developed in May 2006, January 2007, and May 2008, a Phase II Environmental Site Assessment developed in September 2007, with Addendums in February 2008 and July 2009, and a Phase II Site Assessment Report developed in September 2010. Chlorinated VOC are present in shallow soil to the east of Building II, and in overburden groundwater to the northeast, east, and south of the building. PAH compounds were detected in shallow sediment in one isolated area of Mine Brook to the west of the site. Attachment D is a list of related environmental documents.

A description of assessment activities related to mostly the portion of Lot I formally known as Lot 27 is below. Collectively the reports do not identify the full extent of groundwater hazardous chemical contamination.

Assessment work was performed in 2009 and 2010; funding was provided through a MassDevelopment Reimbursable Grant. The work consisted of groundwater gauging and monitoring activities in order to characterize the site in support of a Phase II Comprehensive Site Assessment (CSA). Environmental site assessments conducted between 2006 and 2010 indicated the presence of chlorinated volatile organic compounds, metals, and polycyclic aromatic hydrocarbon compounds in soil. The Phase II CSA standard requires that the full nature and extent of a disposal site be characterized. Additional Site Assessment activities were necessary in order to characterize deep groundwater at the site, but due to the dilapidated nature of the building, these activities could not be completed until the building was demolished.

In 2010, the Town was awarded a \$200,000 *EPA Brownfield Grant* for remediation of hazardous materials on the former Nu-Style Property, and the Town appropriated additional funds. In 2012, the Town awarded a contract for demolition of Building I and partial remediation of the site. During 2012 Building I was demolished and substantial soil remediation was accomplished.

Release Abatement Measure (RAM) Report, April 2013. In May 2012 the Town's LSP (Fuss & O'Neill, Inc.) developed a Release Abatement Measure (RAM) Plan for soil remediation activities at the site in accordance with the MCP (310 CMR 40.0440), and in April 2013 a related RAM Completion Report was produced, which documented the response actions completed at the site and the completion of activities under the RAM Plan. Below is a summary of activities and findings upon completion of the RAM activities:

- Approximately 523 tons of contaminated environmental media (soil and raceway materials) were removed from the site. Approximately 407 tons of soil containing metals and chlorinated VOC was removed from the site and disposed at ESMI of NY, and approximately 116 tons of

soil/sediment material containing metals and PAH was removed from the site and disposed at ESMI of NH.

- Confirmatory soil samples collected at the extents of the soil excavations generally contained significantly lower, but detectable, concentrations of chlorinated VOC.
- The concentrations of PCE and TCE at the northern end of the subject site adjacent to the sewer line remain in excess of the MassDEP Method 1 S-1 soil standards, but that soil was not removed due to the presence of on-site utilities.
- A permanent solution has not been achieved because of the following conditions:
 - The nature and extent of VOC in bedrock groundwater had not been characterized.
 - Groundwater which historically contained VOC at concentrations greater than the MassDEP Method 1 groundwater standards has not been documented to have attenuated to date.
 - VOC remain in soil at the northern end of the site at concentrations greater than the MassDEP Method 1 S-1 soil standards, which may warrant further evaluation.
 - A comprehensive risk characterization incorporating the post-remediation soil data set has not been completed to date to demonstrate whether this soil warrants further remediation activities.

EPA Targeted Brownfields Assessment. In 2013 the Town received technical assistance through the EPA Brownfields Targeted Assessment Program. In May 2013 an EPA contractor sampled soil on site, installed twelve monitoring wells (six shallow and deep monitoring well couplets), and sampled and analyzed shallow and bedrock groundwater. In August 2013 a second round of groundwater sampling was performed from the 12 new monitoring wells, as well as at several monitoring wells installed previously during other Phase II activities. The resulting Targeted Brownfields Assessment Report (Nobis, September 2013) summarizes the assessment results. The vertical nature and extent of contamination was not fully delineated, and additional well locations were recommended.

Soil and Vapor Intrusion Study Report. During the 2013 Brownfields Targeted Assessment, mentioned above, VOCs above the MCP GW-2 standard were detected, particularly TCE in the shallow groundwater monitoring well MW 101S and PCE in the deeper bedrock monitoring well MW 101D. To assure vapors were not infiltrating an adjacent building, the EPA performed a soil vapor intrusion study. Sub-slab sampling ports were installed on December 9, 2014. On December 15, 2014 sub-slab soil gas and 8-hour indoor air samples were collected. Results of the air sampling are included in the Soil Vapor Intrusion Study Report (ECA, January 2015).

Results of Passive Soil Gas Survey, March 2015. During the first three months of 2015 the Town's LSP conducted a passive soil gas analysis in order to evaluate whether additional sources of contamination are present, and to identify the ideal location for additional ground water monitoring wells. A total of 42 passive soil gas samplers were installed across the site and abutting properties. The results of the passive soil gas survey were summarized in a detailed letter (Tata & Howard, March 2015).

Additional Required Phase II ESA Activities

Even with the substantial Phase II assessment activities performed to date, the nature and extent of releases at the site have not been fully delineated. The number and location of sampling points (soil borings, and monitoring wells) have not been sufficient to characterize the site. The data is both representative and usable to characterize the majority of the disposal site, however, there are at least two important exceptions:

- The area of the site within the footprint of Building II has not been characterized.
- The portion of Lot I formally known as Lot 27 near the Old Grove Street bridge, and on adjacent privately owned property just south south-west of the site has not been fully characterized.

To fully assess the property's soil and groundwater contamination, Building II needs to be removed. In 2015 The Town distributed an Invitation for Bids for demolition of Building II resulting in several bids from demolition contractors. The Town did not go through with the demolition project for the following reasons:

- The cost of demolition of Building II and off-site disposal of asbestos containing materials was somewhat higher than expected.
- Problems with the structural integrity of the privately owned building that is connected to Building II were identified. The adjacent/attached building is owned by World Marble & Granite of 20 Grove Street, Franklin, MA.

Instead of going forward with the demolition of Building II the Town hired a structural engineer to assess the adjacent building's structural problems and provide a scope of work and related estimate of needed improvements. The Town received permission to access the adjacent property from the President of World Marble & Granite, Mr. John Neto. The results of the initial structural assessment showed that the Town's building (Building II) cannot be demolished without first designing and implementing structural improvements to World Marble & Granite's adjacent/attached building.

Reassessment of Project Approach

Since identifying problems with the structural integrity of the adjacent/connected privately owned building the Town has reassessed its project approach and potential alternatives. Given the higher than expected cost of building demolition the Town has decided to distribute this RFP in hopes to obtain a private developer who will make structural improvements to the adjacent privately owned building as needed, demolish Building II and remediate hazardous building materials, complete assessment and remedial response actions including achieving compliance with the MCP (310 CMR 40.0000), MassDEP requirements, and redevelop the site.

Potential Federal Tax Credits

A privately owned organization or individual may be able to access significant Federal tax credits to remediate the property, which the Town is not able to access. Therefore total cost of remediation of the former manufacturing site by a privately owned company or individual may be much less than if the Town of Franklin were to perform the work.

A Note on Demolition of Building II

Demolition specifications, a demolition and segregation plan, wetland/waterway protection plans, and an invitation for bids for a demolition contractor were all prepared during 2015. These documents can be made available to the Developer and can serve as draft specifications for the demolition portion of required work.

Building materials within Building II that were suspect of containing hazardous materials have been quantified and characterized. Asbestos was confirmed to be present, and evidence indicates that lead and PCB-containing materials are presumed to be present in the dilapidated building. Building material data compiled by EnviroScience in the March 2009 *Hazardous Building Materials Inspection* is generally sufficient to solicit bids for building demolition, and the bid documents can specifically solicit qualifications relative to controlled demolition and segregation of building materials proximal to wetland areas, hazardous materials abatement, and other project-specific requirements, in order to ensure that the selected contractor is capable of implementing a project of this magnitude. Interior abatement work is not considered feasible due to the structural condition of the building. To implement this approach it will be necessary for the Developer to apply for and receive a waiver from MassDEP to allow demolition prior to abatement.