

COMMUNITY INVOLVEMENT PLAN

BJAT, LLC SUPERFUND SITE

FRANKLIN, MA



Site prior to clean-up efforts.



Site post 2016 building demolition.



May 2017

INTRODUCTION

The U.S. Environmental Protection Agency (EPA) developed this Community Involvement Plan (CIP) based predominantly upon input gathered through interviews with Town of Franklin (Franklin) officials and residents, along with other stakeholders interested in the BJAT, LLC. ***Superfund***¹ Site (Site). EPA's goals for community involvement at the Site are:

- To provide the public with accurate, timely, accessible, and understandable information about the project as it moves forward;
- To provide opportunities for the public to become actively involved, especially when decisions about the cleanup are being made;
- To enlist the support and involvement of local officials and community leaders; and
- To encourage, respect and fully consider community input as the project moves forward.

EPA will achieve these goals through various means, including published documents, meetings, presentations, and community conversations. These activities will be based on the community's needs, as informed by those with whom EPA met while preparing this plan, as well as all legal requirements.

The CIP is a living document and, as necessary and appropriate, it will be updated with community input. If you are interested in suggesting changes to this plan or have questions about it, please contact:

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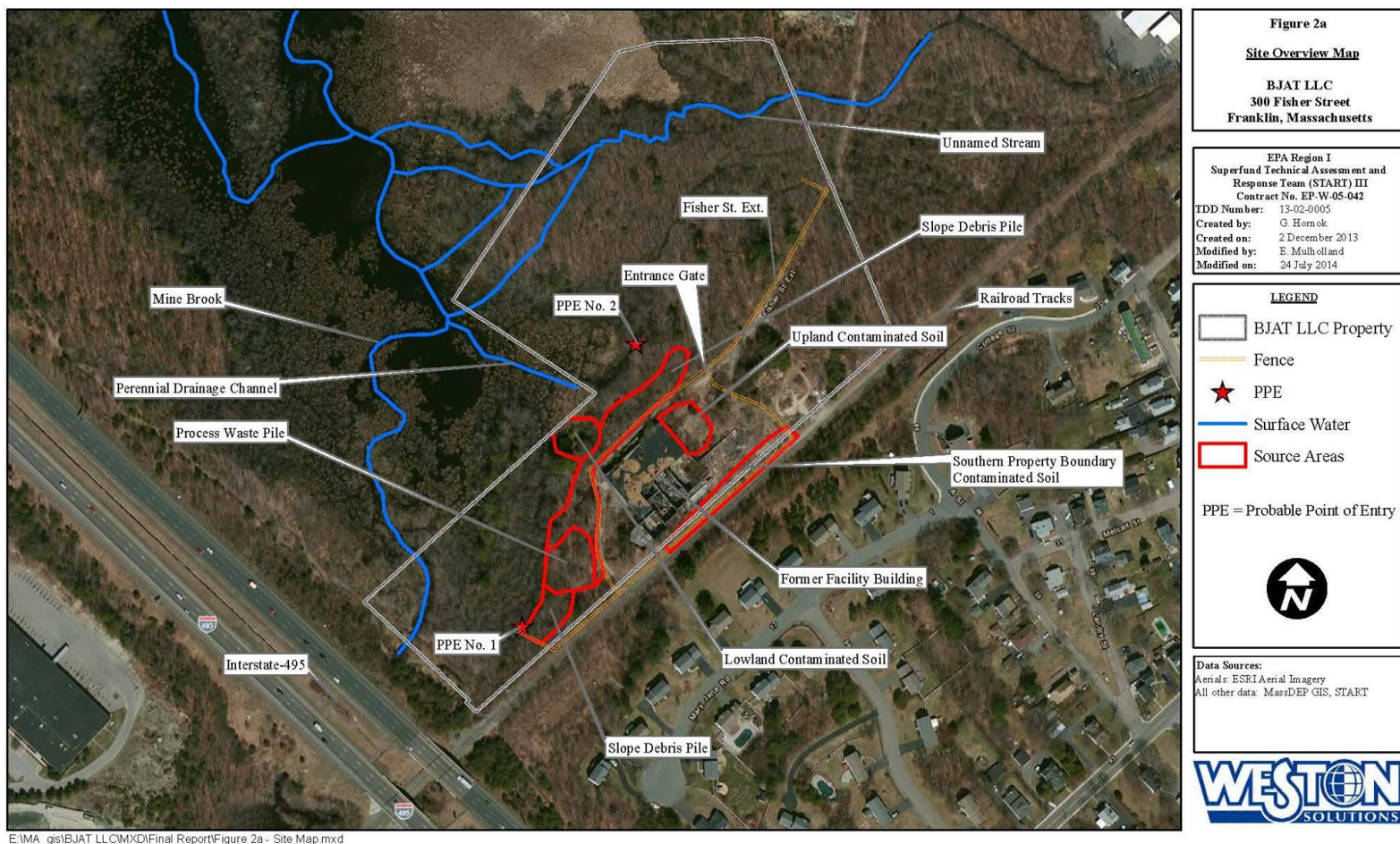
¹ Words written in bold, italic font are defined in the Glossary in Appendix A.

CIP ORGANIZATION

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PART 1

SITE BACKGROUND



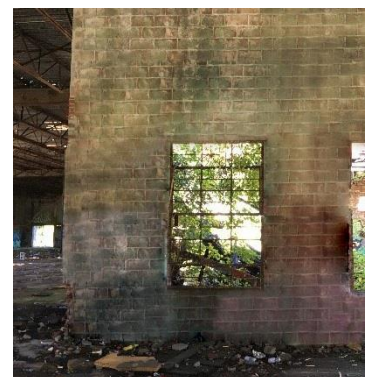
The BJAT, LLC Site (Site) is generally located at 300 Fisher Street in Town of Franklin, MA (Franklin). The property is bordered to the northeast by commercial properties; to the east and southeast by residential properties and railroad tracks; to the southwest by I-495; and to the northwest by several parcels owned by Franklin, consisting of open water, wetlands, woodland, and recreational areas. Surface waters, including Mine Brook and an unnamed stream cross portions of the Site. Habitat supporting a state-listed endangered species, the Least Bittern is present on the Site property adjacent to Mine Brook and elsewhere.

A variety of industries operated at the BJAT property, dating back to the late 1800s, including sugar beet refining, rubber manufacturing, and plastic toy manufacturing. While the Site is no longer occupied, previous operators left areas of process waste and debris disposal. The soil, sediment and groundwater are now contaminated with **lead, mercury, semi-volatile organic compounds (SVOCs)** and **zinc** (please see glossary for more information). The Commonwealth of Massachusetts referred the Site to the EPA because the contaminated groundwater plume may be affecting nearby wetlands, and contamination on the property poses a hazard to people who may come in contact with on-Site soil and debris. Currently, the property is fenced and warning signs have been posted.



In February 2013, EPA initiated investigation of the BJAT property to confirm potential source areas associated with the property, and to investigate impacts to groundwater and to sediments within downgradient surface water bodies and wetlands. On September 30, 2015, based upon the results of the investigation, EPA listed the BJAT Site on the **National Priorities List (NPL)** of **Superfund** sites.

In October 2016, through community interviews, EPA learned that for years, the unoccupied property was used for various purposes, including motorcycle and all-terrain vehicle riding, walking dogs, and playing paintball. The remote location of the Site attracted youth as a place to use drugs and alcohol and adorn the walls with elaborate graffiti. It enticed others as a resource for building bricks and scrap metal. During winters, when trees were bare, neighbors reported seeing bonfires on the property. In December 2015, a large fire occurred in the building and burned for several days.



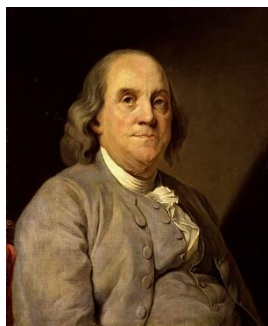


During Fall 2016, BJAT, LLC., the current owner of the Site, conducted particular Site activities pursuant to a state program under the jurisdiction of the Commonwealth of Massachusetts Department of Environmental Protection (MassDEP). Security measures were expanded by placement of lights and a camera at the building, additional signage was posted, and crushed stone was placed over the highly contaminated soil areas. BJAT LLC completed the demolition activities in December 2016. EPA will begin its investigation of the Site in 2017. See Appendix C.

Appendix D provides a general overview of the major steps EPA takes from the time a site is listed on the NPL to the completion of remedial action and eventually, deletion from the NPL.

COMMUNITY PROFILE

The Town of Franklin (Franklin) is a city comprised of 27 square miles in Norfolk County, MA, on the watershed between the Charles and Blackstone Rivers and situated within 30 miles of New England's largest cities; Boston, Providence and



Worcester. It was incorporated in 1778 and named to honor Benjamin Franklin. In recognition of the honor, Dr. Franklin donated books to the city leading to creation of the country's first public library. Franklin's form of government is Home Rule Charter, under which an elected, 9-member Town Council is responsible for policy and the Town Administrator, appointed by the Town Council, is charged with implementing and administering the policies set by the Council. Franklin has been

recognized more than once as one of the country's most desirable places to live. In 2007, Franklin was selected as one of Family Circle's "Ten Best Towns for Families", following the magazine's search for "locations that offer an ideal blend of affordable houses, good jobs, top-rated schools, wide-open spaces, and a lot less stress." The next year, Franklin was ranked #10 on CNNMoney.com's 2008 list of the top 100 best places to live and start a business, for having achieved a desirable balance of business-friendliness and quality lifestyle. Additionally, for the past five years, using population and



Federal Bureau of Investigation crime data, neighborhoodscout.com ranked Franklin one of the top ten safest cities in America and for two of the five years, Franklin was ranked #1.

Franklin's web page indicates that while manufacturing facilities account for roughly 25% of Franklin's jobs, other goods-producing entities and numerous high-tech companies in a variety of industries, such as biotechnology, data storage, and nanotechnology add to the local economy. The Massachusetts Office of Labor and Development documented the average unemployment rate in 2015 in Franklin at 4.1, whereas the U.S. Department of Labor website shows that the average unemployment rate in 2015 for Massachusetts was 5.0, and for the United States, it was 5.3. The average yearly pay in Franklin is \$58,120.00, which is \$3,670.00 lower than that in Massachusetts, but \$8,312.00 higher than the average annual salary in the United States.

Estimated demographic data from the U.S. Census Bureau's 2014 American Community Survey is provided in the chart below.

Total Population	32,393
Median Age	38.6 years
Race <ul style="list-style-type: none"> • White* • Black/African American* • American Indian and Alaska Native*, ** • Asian* • Native Hawaiian and Other Pacific Islander* • Other Race* • Hispanic or Latino (of any race) 	94.5% 1.7% 0.3% 4.6% 0.1% 0.5% 3.1%
*Does not include individuals in this racial group who identify as Hispanic/Latino.	
Population 5 yrs and Over Who Speak English Very Well	98.1%
Living Below Poverty Level ** An estimated 70.4% of those living below poverty are American Indian and/or Alaska Native	3.8%**
Median Home Value	\$381,600
Percent Graduating High School or Higher	98.5%
Percent Bachelor's Degree or Higher	51.5%
Mean Travel Time to Work	33.5 minutes

COMMUNITY CONVERSATIONS

In September 2016, EPA met with Town officials to learn about their concerns relating to the BJAT Site and the community's level of interest in the Site. The officials shared that they had seen very little community interest in the Site, but offered that those most likely to be interested would be the residents in closest proximity to the Site. Subsequently, in early October 2016, EPA mailed over 1,000 letters to residents and businesses located within ¼ mile of the Site (See Appendix B). The recipients' responses confirmed the Town's perception.

Ten residents and two businesses responded, expressing interest in participating in developing this CIP; EPA interviewed all of them.² In addition to the mailings, EPA reached out via email and phone calls to local environmental advocacy groups and local news sources who provided input as well. Finally, EPA held an availability session on October 31, 2016 at the Franklin Department of Public Works facility inviting additional community input. Notice of this session was posted several days prior on the Town's Facebook page, on www.wickedlocal.com, and on www.franklinmatters.org. Three residents attended and shared their views. EPA used the information gained throughout the community engagement process to create this CIP and is grateful for the community's participation.

² *Notably, several of the interested residents are experienced environmental consultants who expressed their intention to be involved as local technical resources for their community.*

Issues/Concerns Voiced During Interviews and EPA Responses

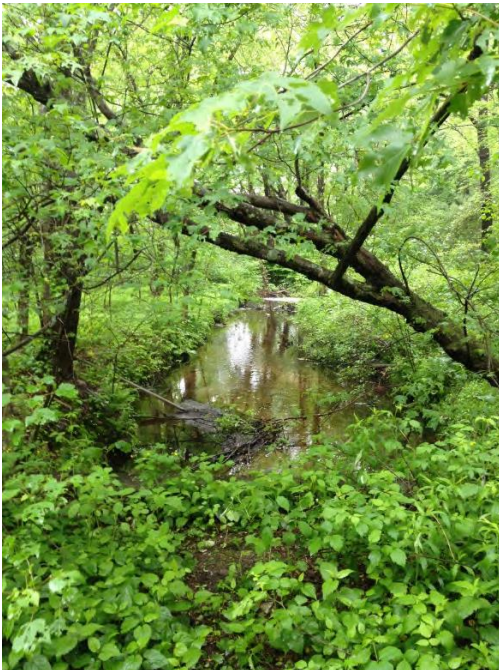
Groundwater

Nearly all persons interviewed expressed protection of the groundwater as one of their greatest concerns. The groundwater aquifer is Franklin's source for drinking water.

*During the **Remedial Investigation**, EPA will collect enough data to: determine the nature and extent of groundwater contamination; analyze potential risks to human health and the environment; and confirm there are no risks to Franklin's drinking water supply relating to the Site. EPA will evaluate alternatives for addressing the risks in a **Feasibility Study (FS)** and will then propose a remedy and invite public input on its **Proposed Plan** for addressing contamination at the Site.*

Surface water

Residents and the participating environmental group identified protection of surface waters as another major concern. Surface waters flowing over the Site flow into Mine Brook, Beaver Pond and wetlands within the Charles River watershed. These resources are important to the community from both recreational and ecological perspectives.



EPA will investigate not only on the BJAT property, but beyond its boundaries, into the wetlands and Mine Brook to evaluate potential risks to human health and ecological receptors via surface water and alternatives for addressing risks present.

View of an Unnamed Stream which empties into Mine Brook, located on the northern portion of the BJAT property. Photograph taken facing west.

Future Use

Another concern shared by most of the interviewees is the future use of the BJAT property. Most expressed a desire for open space or recreational use of the property, yet other ideas conveyed include a solar panel farm, a train storage

area, and relocation of the existing train station to the BJAT property; several spoke of the need to avoid development of the property for the benefit of the wildlife in the area.

It is difficult to know today what will become of the property in the future. Still, EPA will take into consideration the community's stated desires for the future use of the property as it prepares likely risk scenarios and develops various alternatives for remediating the Site.

Site Safety

Residents and city officials want to be sure that the property is secured so that trespassers are not exposed to contamination. Additionally, emergency personnel require guidance to minimize potential risks should they need to enter the property.

EPA will create a Health and Safety Plan for the Site which will address these concerns and will be available to emergency personnel. Several safety measures have already been installed, such as signage and fencing.



One resident cautioned that safety en route to the Site should also be considered, particularly when crossing the railroad track on Fisher St. just before the Site entrance. Some time ago, a low tractor trailer got stuck on the tracks, so this resident suggested that if low vehicles will be entering the property, that crossing may need to be regraded.

EPA will take this potential hazard into consideration while developing the Health and Safety Plan for the Site.

Sampling Data

One resident is concerned that the previous data collected at the Site is insufficient and suggested particular parameters be measured in future sampling. Several people are interested in locations EPA will sample during the Remedial Investigation; one requested samples be taken at locations both upstream and downstream of the Site and in Mine Brook, and another requested sufficient sampling to define the **capture zone** of Franklin's drinking water wells near the Site.

*EPA will take these community concerns into consideration while developing plans for the Remedial Investigation. Sampling is an iterative process; the results of one round of sampling often inform where additional sampling should be conducted. Enough samples from various locations will be collected to define the nature and extent of contamination at the Site and to determine any potential risk. This will include confirming that there is no risk from the Site to public drinking water wells. The data EPA collects will be part of the **Administrative Record** and will be made available to the public when the Remedial Investigation is completed.*

Demolition Activities

While EPA was conducting interviews, a building on the BJAT property was being demolished under a MassDEP program. Residents raised concerns about dust control and safe removal of **asbestos** during the building demolition, along with the worry that disturbance of the slab would potentially cause increased exposure to contaminated soils;

While the work was conducted under a MassDEP program, EPA is aware that dust control measures were in place and that the asbestos was removed in accordance with MassDEP requirements to minimize exposures during the demolition to both workers and residents surrounding the site. In addition, new fencing was erected in an effort to prevent potential exposure to contaminated soils. Any concerns or questions about the demolition are best addressed to the persons identified in the September 2016 Fact Sheet

under the “demolition” heading. See Appendix C. A post-demolition report will be posted on the MassDEP website in 2017.

Potential Costs to Franklin

A few questions were raised about whether the Superfund cleanup will cause an increase in local taxes or other costs to the Town of Franklin.

EPA cannot predict if local taxes will increase because of the cleanup of the property. The funds expended to perform the cleanup, however, will not come directly from the Town of Franklin.

The Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA or Superfund), was enacted by Congress on December 11, 1980. This law created a tax on the chemical and petroleum industries that went into a Trust Fund; it also granted Federal authority to use the Trust Fund to respond directly to releases or threatened releases of hazardous substances that may endanger public health or the environment. CERCLA was amended by the Superfund Amendments and Reauthorization Act (SARA) on October 17, 1986.

Entities suspected of having contaminated a site are called Potentially Responsible Parties (PRPs). Whenever possible, EPA compels responsible parties to cleanup a site they created or contributed to. If EPA is unable to identify the responsible parties or compel them to do the work, EPA will pay for site cleanup using the Trust Fund. In this instance, the State in which the site is located pays a 10% share of the costs of cleanup.

At the BJAT Site, some of the preliminary work such as the building demolition, fencing, and signage has been completed by BJAT, LLC under MassDEP oversight. At this time, EPA expects to conduct the Remedial Investigation/Feasibility Study, and the subsequent cleanup actions with funds from the Trust Fund and the 10% contribution from Massachusetts. In the future, if EPA is able to identify viable responsible parties, EPA may seek recovery from them of the costs expended on the cleanup. For additional information, see <https://www.epa.gov/enforcement/superfund-cost-recovery>.

Jobs

One resident asked whether jobs would be available to residents interested in working with EPA while conducting response activities at the Site.

The EPA Superfund Jobs Training Initiative is a job readiness program that offers training and employment opportunities for people in communities affected by Superfund sites. For more information, see Appendix E and <https://www.epa.gov/superfund/superfund-job-training-initiative>.

Community Involvement Action Plan

Resources for the Community

Contacts for the Site:

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Information Repository and Administrative Record

EPA maintains a local public Site file, which is called the “Information Repository.” The Information Repository contains hardcopies of major site documents, fact sheets and other relevant items. Electronic copies on compact disk will be available for some documents as well. To browse or check-out Site documents, please visit the Information Repository at: Franklin Public Library, 25 Kenwood Circle, Franklin, MA 02038. This is a temporary location for the library, so when remodeling at the main location is completed, the Information Repository will be relocated to: 118 Main St., Franklin, MA 02038.



When EPA is ready to formally propose a cleanup action, it must collect every document that was used to develop and analyze the proposed action. This collection of technical documents is called the Administrative Record, and it will be located in the Information Repository. There is a specific Administrative Record for every proposed cleanup action.

BJAT Site-specific Websites:

EPA: www.epa.gov/superfund/bjat EPA will update this website on an ongoing basis.

MassDEP: <http://public.dep.state.ma.us/fileviewer/Rtn.aspx?rtn=2-0016683>

Resident-created Facebook page³:

<https://www.prod.facebook.com/groups/280715245661894/>

Tools EPA Will Use

Electronic Media

Community members indicated that electronic media is likely the most popular means by which Franklin residents are kept informed. Specifically, the following resources were identified as those most often used for information about what is happening in Franklin:

- Town of Franklin – www.franklinma.gov; Facebook; Twitter
- Franklin Matters – www.franklinmatters.org; Facebook; Twitter
- The Milford Daily news – www.milforddailynews.com
- Friends of Franklin – Facebook; Twitter
- Wicked Local Franklin – www.franklin.wickedlocal.com; Facebook; Twitter
- All About Franklin Mass – Facebook; Twitter
- localtownpages.com/papers/Franklin – a monthly

EPA contacted representatives of The Milford Daily News, Franklin Matters and the Town of Franklin early on to establish open lines of communication with the Franklin community. As work on the Site gets started and progresses, EPA will

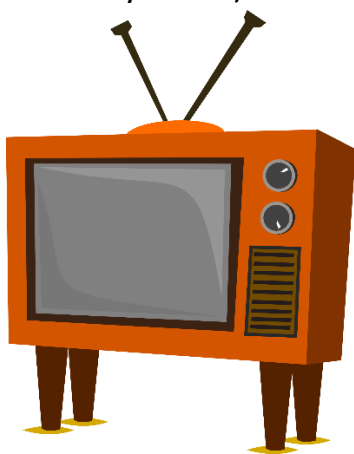
³ Note: Following the interviews, a resident set up a new Facebook page for the BJAT site which can be found at: <https://www.prod.facebook.com/groups/280715245661894/>

refer to this list and the print organizations identified below to seek assistance with keeping the community informed.

Printed Newspapers

The most popular printed newspapers reportedly include:

- The Milford Daily News
- The Country Gazette (owned by the same company which owns The Milford Daily News)



Television

Nearly everyone interviewed reported there are many viewers of Public Access TV in Franklin, and they suggested EPA consider working with the local station to present information to the public. When practical, EPA will reach out to the local television station when a formal public meeting is planned to request the station air the meeting. At other times, when there is significant information to share, EPA may also request assistance from the local station to record an information session for the public.

Mailing

EPA maintains an electronic mailing list for the Site, so whenever there is information to share, EPA will distribute it to everyone on the mailing list. Anyone who would like to be added to the BJAT Site mailing list, please contact the Community Involvement Coordinator. Her contact information is on page 12.

Community Meetings

When EPA is ready to formally propose a cleanup plan, it creates a document called a Proposed Plan. The Proposed Plan summarizes the contamination that has been found, compares the various means by which the contamination can be cleaned up, and identifies one alternative that EPA prefers and the reasons for its preference. **This is the most important time for community input.**

When the Proposed Plan for the BJAT Site is completed, EPA will conduct a public meeting to discuss the Proposed Plan and to invite public comments on the Plan. EPA is required to hold a public meeting at this stage of the project. EPA will refer to the recommendations recorded in this CIP when arranging the public meeting.

EPA will hold **public meetings** at various milestones and when otherwise warranted. The public meetings will be organized to convey Site information via presentations and discussions, and to answer questions from community members. Each meeting will be structured to fit its purpose by using different formats (e.g. town hall meetings, open houses, informal roundtables, PowerPoint presentations, etc.).

Most people with whom EPA spoke prefer small, **informal meetings** over large, public meetings. They said public meetings are not well attended, except meetings involving school issues which generally draw families whose children are enrolled in the schools. Participants also reported that **Public Access television** productions of local meetings receive significant numbers of viewers. EPA welcomes requests to participate in smaller, informal meetings, such as the Town's Technical Review meetings, Town Council meetings, or informational meetings at the Seniors Center or a Housing Development.

In addition to working with the local Public Access TV station, residents suggested that EPA consider reaching out to the Public Schools system to request assistance with distributing materials such as flyers or fact sheets about the Site.

EPA received several ideas for **meeting venues**. Town Hall was mentioned as one, but several residents relayed concern that the acoustics sometimes make it difficult to hear what is being said. A church hall and the Elks Club were also suggested. The high school auditorium was recommended for accommodating large group meetings. Finally, the Franklin Public Library was recommended for meetings held after renovations at the library are completed. EPA will refer to this list and to the suggestions recorded above when planning meetings.

Fact Sheets, Hand-outs and Flyers

Fact Sheets are one of EPA's principal methods of providing site-related information to the community. They are brief (2-4 page) documents, written in non-technical language, that are mailed directly to the site's mailing list and posted on site websites. They often summarize larger, technical documents, provide general Site updates, or announce community meetings. They include EPA contact information and refer people to the internet and Information Repository for more technical information. EPA will create fact sheets as events dictate or in response to community requests for specific kinds of information. Appendix C was the first EPA fact sheet created for the BJAT Site.

Flyers are 1-2 page notices that are sometimes distributed during door-to-door notifications or posted on community bulletin boards. EPA has posted flyers or fact sheets on the BJAT website, the Town of Franklin Facebook page, and in local newspapers.

Handouts provide supplemental information, for example at community meetings. Some are also posted to EPA's website. EPA may use handouts for future updates or in conjunction with presentations or meetings regarding the BJAT site.

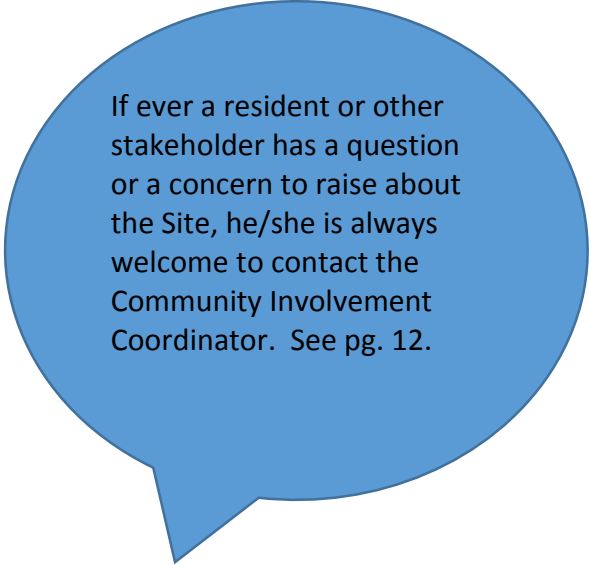
Community Events

EPA will occasionally attend community events to share information and hear public concerns and/or answer questions. During the community interviews, one person suggested that EPA connect with the **Franklin Downtown Partnership** to set up an information booth during their sponsored events in downtown Franklin. EPA will follow-up on this suggestion as another potential means of facilitating informal communications between EPA and communities.

Emergencies

Town officials and others told EPA about the Police Department's "**Blackboard**" which operates as a reverse 911 for any resident who signed up for the program. In the event an emergency occurs at the Site, EPA will be in contact with Franklin officials to discuss how best to reach residents.

Frequency of EPA Contact



If ever a resident or other stakeholder has a question or a concern to raise about the Site, he/she is always welcome to contact the Community Involvement Coordinator. See pg. 12.

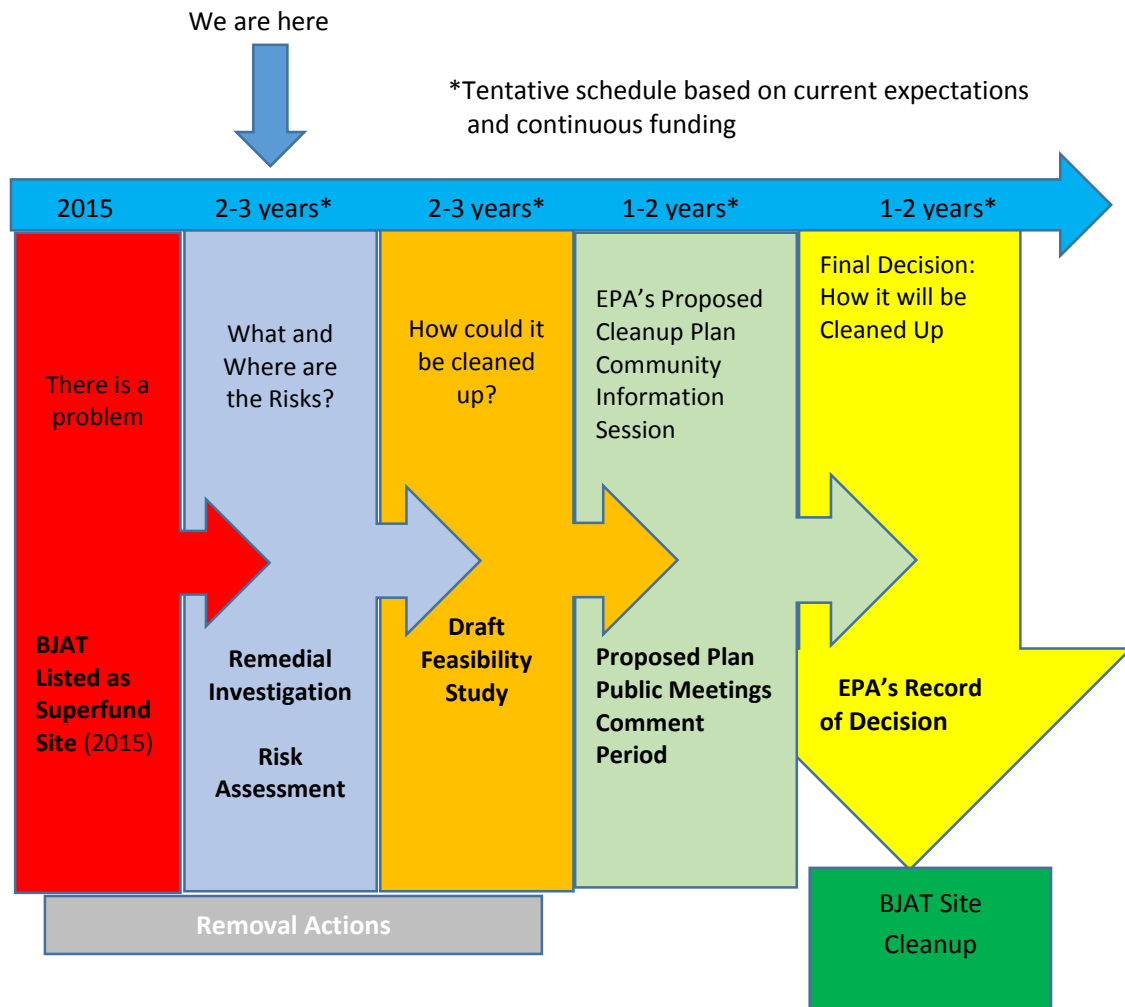
Most participants recommended EPA conduct community outreach whenever a major milestone is reached or there is significant news to relay; some suggested quarterly communications once EPA begins the Remedial Investigation. EPA will conduct outreach when milestones are reached and, when there is significant news to report, EPA will share it in a timely manner.

TENTATIVE SCHEDULE

In order to manage the multi-year investigation and cleanup project, EPA creates a schedule which includes the sampling effort, delivery of technical documents, cleanup decision-making, design of the remedy, construction, and eventually review and evaluation of the results. Throughout this process there are opportunities for community involvement.

ACTIVITY	COMMUNITY INVOLVEMENT
Field Investigation	Town Council Updates Community Involvement Plan
Sampling Results	Available in Information Repository and on website
<i>Risk Assessments</i>	Available in Information Repository and on website
RI/FS Report	Community Meeting and Fact Sheet; Available in Information Repository and on website
Proposed Plan	Fact Sheet Public Meeting Public Comment Period
<i>Record of Decision</i>	Responsiveness Summary Fact Sheet announcing Remedy Decision

Below is a timeline depicting a general framework of the Superfund cleanup process. The Superfund process at this Site may also include ***removal actions*** to address the most immediate threats. See also Appendix D.



APPENDIX A: GLOSSARY

Asbestos: A mineral fiber that can pollute air or water and cause cancer or asbestosis when inhaled. EPA has banned or severely restricted its use in manufacturing and construction.

Capture zone: The portion of a groundwater aquifer that contributes the groundwater extracted by one or more wells or drains.

CERCLA: Comprehensive Environmental Response, Compensation, and Liability Act (commonly known as Superfund). This law, enacted by Congress on December 11, 1980, created the Superfund program. Specifically, CERCLA (1) established prohibitions and requirements concerning closed and abandoned hazardous waste sites, (2) provided for liability of persons responsible for releases of hazardous waste at these sites, and (3) established a trust fund to provide for cleanup when no responsible party could be identified. See <https://www.epa.gov/superfund>.

Groundwater: The supply of fresh water found beneath the Earth's surface, usually in aquifers, which supply wells and springs. Because groundwater is a major source of drinking and irrigation water, there is growing concern over contamination from leaching agricultural or industrial pollutants.

Heavy metals: Metallic elements with high atomic weights; (e.g. mercury, chromium, cadmium, arsenic, and lead); can damage living things at low concentrations and tend to accumulate in the food chain.

Information Repository: A file containing current information, technical reports, and reference documents regarding a Superfund site. The information repository is usually located in a public building that is convenient for local residents, such as a public school, city hall, or library.

Lead: A heavy metal that is hazardous to health if breathed or swallowed. Its use in gasoline, paints, and plumbing compounds has been sharply restricted or eliminated by federal laws and regulations. For more information, see <https://www.epa.gov/lead/learn-about-lead>.

Mercury: is a naturally-occurring chemical element found in rock in the earth's crust, including in deposits of coal. For more information, see <https://www.epa.gov/mercury/basic-information-about-mercury>.

National Priorities List (NPL): The list of national priorities among the known releases or threatened releases of hazardous substances, pollutants, or contaminants throughout the United States and its territories. The NPL is intended primarily to guide the EPA in determining which sites warrant further investigation. For more information, see <https://www.epa.gov/superfund/superfund-national-priorities-list-npl>.

Proposed Plan: EPA's plan for cleaning up the site. When completed, EPA will issue a public notice through the local media to notify the community, so interested members of the community can comment on the Proposed Plan. In addition, the Agency may hold a public meeting to discuss the Proposed Plan. EPA then will develop a Responsiveness Summary to formally respond to public comments received. If, based on public comments, the Proposed Plan is changed substantially, EPA will issue an explanation of the changes made and invite public comment on the changes.

Record of Decision: A public document that explains which cleanup alternative(s) will be used at National Priority List Sites.

Remedial Investigation and Feasibility Study: The remedial investigation (RI) serves as the mechanism for collecting data to characterize site conditions, determine the nature of the waste, assess risk to human health and the environment, and conduct treatability testing to evaluate the potential performance and cost of the treatment technologies that are being considered. The feasibility study (FS) is the mechanism for the development, screening, and detailed evaluation of alternative remedial actions.

The RI and FS are conducted concurrently - data collected in the RI influence the development of remedial alternatives in the FS, which in turn affect the data needs and scope of treatability studies and additional field investigations. This phased approach encourages the continual scoping of the site characterization effort, which minimizes the collection of unnecessary data and maximizes data quality.

Removal Actions: Short-term immediate actions that address releases of hazardous substances that require expedited responses.

Risk Assessment: Qualitative and quantitative evaluation of the risk posed to human health and/or the environment by the actual or potential presence and/or use of specific pollutants.

Semi-Volatile Organic Compounds (SVOCs): A general term for organic compounds composed primarily of carbon and hydrogen atoms that volatilize relatively slowly at standard temperature (20 o C) and pressure (1 atm).

Superfund Amendments and Reauthorization Act (SARA): Legislation that amended the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) on October 17, 1986. SARA reflected EPA's experience in administering the complex Superfund program during its first six years and made several important changes and additions to the program. SARA stressed the importance of permanent remedies and innovative treatment technologies; required Superfund actions to consider the standards and requirements found in other State and Federal environmental laws and regulations; provided new enforcement authorities and settlement tools; increased State involvement; increased the focus on human health problems; encouraged greater citizen participation; and increased the size of the Trust Fund to \$8.5 billion.

Superfund: EPA's program operated under CERCLA and SARA which is responsible for cleaning up some of the nation's most contaminated land and responding to environmental emergencies, oil spills and natural disasters. To protect public health and the environment, the Superfund program focuses on making a visible and lasting difference in communities, ensuring that people can live and work in healthy, vibrant places. See CERCLA, above.

Zinc: Zinc is an element commonly found in the Earth's crust. It is released to the environment from both natural sources and human activity, but mostly from the latter. For more information, see <https://www.atsdr.cdc.gov/toxprofiles/tp60-c6.pdf>

APPENDIX B: EPA LETTER TO AREA RESIDENTS



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
5 POST OFFICE SQUARE, SUITE 100
BOSTON, MA 02109-3912

Dear Current Resident,

The United States Environmental Protection Agency (EPA) listed the BJAT, LLC site (Site), located at 300 Fisher Street, Franklin, MA, as a Superfund site on the National Priorities List nearly a year ago. Sites listed under the Superfund program are investigated and cleaned up, with the goal of eventually putting the properties into productive use by eliminating or reducing environmental contamination and health risks associated with hazardous waste. This process takes many years of work and throughout the entire cleanup process EPA believes that community members like yourself should have every opportunity to help make decisions that affect your community. Therefore, EPA seeks to build relationships in the community to inform, engage, and involve the community in EPA's decision-making plans for the Site.

As the Community Involvement Coordinator for the Site, I am beginning the process of creating a Community Involvement Plan (CIP) to set forth EPA's strategy for engaging and involving the community during the Superfund cleanup process. EPA is very interested in your Site-related expectations, interests, and concerns, as well as learning about how you receive or would prefer to receive Site-related information from EPA. Your input into the development of the CIP will assist EPA in making it a plan that works for your community.

I am planning to visit Franklin on October 6th and 7th, along with Kimberly White, the Remedial Project Manager for the Site, and Elizabeth Murphy, a consultant to EPA who is assisting with the CIP. We would sincerely appreciate the opportunity to meet with you to share information about the Site, to learn about your concerns and needs related to the Site, and to gather your thoughts about how best to communicate with the community. We would like to schedule a meeting at a time that is convenient for you, and at a location where you would feel most comfortable, whether that is at your home, the library, or elsewhere. Please let us know a time and a location you might prefer. The meeting would likely take no more than an hour of your time, probably less.

Please contact Elizabeth Murphy by October 3rd at 203-482-0314 or elizabethomurphy@msn.com, as she is coordinating the schedule of meetings. Feel free to contact me, however, with any questions about this letter or generally about the Site. Please also find a factsheet enclosed with more Site information.

Sincerely,

Marilyn St. Fleur

Marilyn St. Fleur, MPH
Community Involvement Coordinator

Telephone: 617-918-1617
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SUPERFUND

Cleaning Up New England **SITE UPDATE NO. 1**

BJAT Site, Franklin, MA

U.S. EPA | HAZARDOUS WASTE PROGRAM AT EPA NEW ENGLAND



THE SUPERFUND PROGRAM protects human health and the environment by investigating and cleaning up often-abandoned hazardous waste sites and engaging communities throughout the process. Many of these sites are complex and need long-term cleanup actions. Those responsible for contamination are held liable for cleanup costs. EPA strives to return previously contaminated land and groundwater to productive use.

SITE DESCRIPTION:

The BJAT Site located at 300 Fisher Street in Franklin, Massachusetts was historically used for industrial operations including the manufacture of rubber and plastic products. The property is fenced and has not been active since 1985. Prior environmental investigations have found contaminants of concern in soils, groundwater, sediments, and surface water. The Site was added to the National Priorities List (NPL), often referred to as the EPA Superfund list, in September 2015, making it eligible for long-term cleanup action under the federal Superfund program.

EPA'S INVOLVEMENT AT THIS SITE: DEMOLITION (BJAT):

The Commonwealth of Massachusetts Department of Environmental Protection (MassDEP) referred the Site to the EPA because the contaminated ground water plume may impact nearby properties and wetlands, contamination on the property could pose a hazard to people that may come in contact with soil and waste, and it lacked funding to clean up the Site. EPA has begun its evaluation of the Site by collecting samples to more fully understand the nature and extent of contamination.

In the spring of 2015, the Town of Franklin's building inspector issued a letter to the owner of the property, BJAT, LLC ("BJAT"), regarding structural deficiencies in the buildings at the Site. To address these concerns and to remove above ground safety hazards, BJAT has agreed to demolish the Site buildings and remove the debris from the Site. These efforts are expected to begin in September 2016. This will include the removal and management of polychlorinated biphenyls (PCBs) and asbestos associated with certain building materials. During the demolition, air monitoring will be conducted along the perimeter of the Site, ensuring that the public is not at risk. Once demolition is completed, EPA will continue assessment activities on the Site. The current fence and gate will be left in place after demolition to prevent trespasser access.

KEY CONTACTS:

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Community Involvement
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TIM ALDRICH
Site Specific Superintendent
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Site Specific Project Manager
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GENERAL INFO:

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Suite 100
Boston, MA 02109-3912

**TOLL-FREE
CUSTOMER SERVICE**
1-888-EPA-7341



September 2016

APPENDIX C: SEPTEMBER 2016 FACT SHEET

SUPERFUND | HAZARDOUS WASTE PROGRAM AT EPA NEW ENGLAND

SITE UPDATE

BJAT'S ANTICIPATED DEMOLITION ACTIVITIES:

- Set up of Site controls and signage
- Initiation of the Non-Traditional Asbestos Abatement Work Plan¹
- Abatement of Asbestos containing materials
- Remediation and management of PCB containing materials
- Building Demolition Activities
- Site Restoration Activities
- Post Demolition Monitoring

NEXT STEPS:

Following the building demolition conducted by BJAT in the Fall of 2016, EPA will begin a study known as a Remedial Investigation (RI). The RI will identify the nature and extent of Site contamination and the potential human health and environmental risks that the Site may pose. The results of this study will be used to develop a Feasibility Study (FS) which will identify what long-term cleanup measures may be appropriate to address human health and ecological risk at the Site. In addition, EPA will determine if immediate response actions need to be conducted to address any imminent hazards that are identified by sample collection efforts. Community involvement activities will take place throughout the Superfund cleanup process. To sign up to receive updates electronically email: stfleur.marilyn@epa.gov

FOR ADDITIONAL INFORMATION:

State Contact: Janet Waldron, MassDEP, Project Manager, (617) 556-1156, janet.waldron@state.ma.us

EPA: www.epa.gov/superfund/bjat

MassDEP: <http://public.dep.state.ma.us/fileviewer/Rtn.aspx?rtn=2-0016683>

¹These are MassDEP approved practices that are needed to address situations in which the prescribed practices in the Asbestos Regulation cannot be implemented safely (e.g., before demolition of a fire-damaged building; or in areas near high-voltage electrical equipment and other situations where wetting would be dangerous).

APPENDIX D: OVERVIEW OF SUPERFUND PROCESS

The Superfund Process: Discovery and Cleanup for a Long-Term Site



APPENDIX E: SUPERFUND JOBS TRAINING INITIATIVE BROCHURE

Where Can I Learn More About The SuperJTI Program?

For more detailed information, please visit the SuperJTI website at:

www.epa.gov/superfund/community/sfjti

Or contact the SuperJTI Program Managers:

EPA Regions 1-5
Melissa Friedland
(703) 603-8864
friedland.melissa@epa.gov

EPA Regions 6-10
Viola Cooper
(415) 972-3243
cooper.viola@epa.gov

Additional EPA Resources



EPA Home:
www.epa.gov

EPA Community Involvement Program:
www.epa.gov/superfund/community

EPA Community Advisory Groups (CAGs):
www.epa.gov/superfund/community/cag

EPA Technical Assistance Grants (TAGs):
www.epa.gov/superfund/community/tag

EPA Technical Assistance Services for Communities (TASC) Contract:
www.epa.gov/superfund/community/tasc

ABEX Corp., Portsmouth, VA
Agriculture Street Landfill, New Orleans, LA
Douglas Roads, Milwaukee, WI
Dutch Boy, Chicago, IL
Fort Ord, Monterey, CA
Jacksonville Ash, Jacksonville, FL
Kerr-McGee, Chicago, IL
Many Diversified Interests, Inc., Houston, TX
North Denver, Denver, CO
RISK Snelter, Dallas, TX
Savannah River Site, Aiken and Milledale, SC
Tar Creek, Miami, OK
TaraCorp, Granite City, MO
Tennessee Products, Chattanooga, TN
Washington Navy Yard, Washington D.C.
Young Community Developers, Inc., San Francisco, CA



Successful SuperJTI Sites



EPA 540-FS-09-00

The Superfund Job Training Initiative



Does your community need jobs and job training?

If so, the Environmental Protection Agency's Superfund Job Training Initiative can help!

U.S. Environmental Protection Agency
Superfund Job Training Initiative



www.epa.gov

THE SUPERFUND JOB TRAINING INITIATIVE

Making a *Difference* in Communities



What Is The Superfund Job Training Initiative?

The Superfund Job Training Initiative (SuperJTI) is an environmental remediation job readiness program that provides free training and employment opportunities for citizens living in communities affected by Superfund sites.

The Superfund program uses its experience working with communities to create partnerships with local businesses, universities, labor unions, community and social service organizations, and other federal agencies to address local workforce issues. EPA's goal is to help communities develop job opportunities and partnerships that remain long after a Superfund site is cleaned up.

EPA offers SuperJTI training through its Technical Assistance Services for Communities (TASC) contract, which provides independent educational and technical assistance to communities affected by Superfund sites.

How Can SuperJTI Benefit My Community?

Through the SuperJTI program, EPA and its partners can make the most of resources and expertise to help citizens living in communities affected by Superfund sites.

SuperJTI benefits communities by:

- Increasing understanding of site conditions and cleanup efforts.
- Providing individuals with marketable skills that enhance employment potential.
- Enabling community members to play active roles in the protection and restoration of their neighborhoods.
- Providing assistance with job placement.

SuperJTI combines classroom instruction with hands-on training exercises for each participant. SuperJTI graduates have the technical skills to work on a broad range of projects in environmental remediation and construction as well as the cleanup of Superfund sites.

What Are SuperJTI's Accomplishments?

Approximately 400 trainees nationwide have participated in SuperJTI. Graduates of SuperJTI have been placed in a variety of jobs.

- Dump truck drivers
- Environmental technicians
- General production operators
- Heavy equipment operators
- Material handlers
- Radiological control inspectors

Approximately 80 percent of trainees from previous SuperJTI programs have been placed into jobs.



Visit the SuperJTI website at: www.epa.gov/superfund/community/sfjti

APPENDIX F: SELECT NEWS ARTICLES



Franklin site gets Superfund status

Wednesday

Posted Sep 30, 2015 at 4:04 PM

Updated Sep 30, 2015 at 4:04 PM

BOSTON - The former BJAT site in Franklin has been placed on the EPA's priority, or Superfund, list after determining that waste from the former plant poses a hazard to people and wetlands in the area.

The U.S. Environmental Protection Agency (EPA) announced Wednesday it will add the Fisher Street hazardous waste site to the National Priorities List (NPL) of Superfund sites. The Superfund program, a federal program established by Congress in 1980, investigates and cleans up the most complex, uncontrolled or abandoned hazardous waste sites in the country and converts them into productive local resources by eliminating or reducing health risks and environmental contamination associated with hazardous sites.

Beginning in the late 1800s, the BJAT LLC site, was used for industrial operations including the manufacturing of rubber and plastic products. The property has not been active since 1985, however, over the years, manufacturing activity has left areas of industrial waste and debris on the property. The soil, sediment and ground water are now contaminated with lead, mercury and zinc as well as semi-volatile organic compounds (SVOCs). The site was referred to the EPA because the contaminated ground water plume is affecting nearby wetlands, and contamination on the property poses a hazard to people that may come in contact with soil and debris.

"EPA continues to protect public health and the environment in communities with an industrial past that has left contamination behind," said EPA Regional Administrator Curt Spalding. "Now that the BJAT LLC Site is listed on the NPL, we will begin a comprehensive study and cleanup work in Franklin to help ensure that we are protecting health and the environment in this community."

"Superfund designation will promote cleanup of this site," said Commissioner Martin Suuberg of the Massachusetts Department of Environmental Protection. "The required cleanup is potentially extensive and complex, so the Superfund will provide the resources needed for achieving a full and comprehensive cleanup. We look forward to working with the EPA."

As with all NPL sites, EPA first works to identify companies or people responsible for the contamination at a site, and requires them to conduct or pay for the cleanup. For the newly listed sites without viable potentially responsible parties, EPA will investigate the full extent of the contamination before starting substantial cleanup at the site.

The Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), the law establishing the Superfund program, gives EPA the authority to clean up releases of hazardous substances and directs EPA to update the NPL at least annually to protect human health and the environment with the goal of returning these sites to communities for productive use. The NPL contains the nation's most serious uncontrolled or abandoned hazardous waste sites. The list serves as the basis for prioritizing both enforcement actions and long-term EPA Superfund cleanup funding; only sites on the NPL are eligible for such funding.

Federal Register notices and supporting documents for the final and proposed sites: <http://www.epa.gov/superfund/sites/npl/current.htm>



Franklin officials pleased with Superfund designation

Thursday

Posted Oct 1, 2015 at 6:33 PM

Updated Oct 1, 2015 at 6:33 PM

By Mike Gleason/Daily News Staff

FRANKLIN - Area officials reacted favorably to news that a contaminated property on Fisher Street had been added to the Environmental Protection Agency's list of Superfund sites.

The EPA announced Wednesday that the former BJACT LLC property will be placed on the agency's National Priorities List of Superfund sites. The land at 300 Fisher St., according to an EPA release, has been used for industrial purposes since the late 1800s, with rubber and plastic manufacture among its uses. It is currently inactive, and has been so since 1985.

Congressman Joseph Kennedy III said in a statement that he felt the site's addition to the list will speed cleanup efforts.

"This Superfund designation will help Franklin ensure that the future and potential of this site is no longer limited by the pollution of its past," he said. "With our Commonwealth's proud tradition of manufacturing, investing in efforts to remove hazardous waste and clean up local communities is critical to our continued economic growth. I applaud the EPA for adding BJAT LLC to the National Priorities List and look forward to supporting efforts to keep it clean for generations to come."

Town Administrator Jeffrey Nutting said that from Franklin's perspective, the news was welcome.

"We absolutely want it cleaned up," he said. "We don't want pollution."

Nutting, though, noted that it will likely be some time before the property itself is clean.

APPENDIX F: SELECT NEWS ARTICLES

"They've told us this is a ten-to-20-year process, but we have to get it done," he said.

According to Nutting, the news does not come as a surprise - the town has been working to get the land cleaned up for some time.

"We recognized it as an issue, wanted to get it on the list, and filed a formal request with the last governor's office," he said. "We've been going through the process."

The 18-acre parcel, which is near the town Department of Public Works facility and Interstate 495, is said to have high levels of lead, mercury and zinc in its soil.

As part of the land's Superfund designation, the EPA will seek those responsible for contamination and have them either clean the land or pay for clean-up efforts. If no such parties are identified, the agency itself will clean the property.

Mike Gleason can be reached at 508-634-7546 or mgleason@wickedlocal.com. For news throughout the day, follow him on Twitter [@MGleason_MDN](https://twitter.com/MGleason_MDN).

**THE MILFORD
DAILY NEWS**

Franklin: EPA reaching out on Superfund site

Monday

Posted Oct 10, 2016 at 12:01 AM

By **Mike Gleason**

Daily News Staff

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FRANKLIN - The federal Environmental Protection Agency has begun seeking community input regarding a Superfund site in town - an early step in the cleanup process.

EPA representatives were in Franklin on Thursday and Friday last week, looking for ways to better inform residents about the Fisher Street site and future efforts there.

The agency placed the BJAT, LLC property at 300 Fisher St. on its National Priorities List (NPL) in September 2015. That land, according to officials, has been used for industrial purposes since the late 1800s, and was last used for rubber and plastic manufacture. The facility there has been inactive since 1985.

Marilyn St. Fleur, a community involvement coordinator for the EPA, said the department is now in the process of creating a community profile for Franklin.

"We want to learn what's here, the history of the site and the best way to get in touch with residents - how they want to be contacted or notified," she said.

The site, said EPA Remedial Project Manager Kimberly White, is now in the midst of a state-run cleanup, with the building there set to be demolished in the coming weeks. Once the state has finished with its efforts, she said, work will be turned over to the federal government.

APPENDIX F: SELECT NEWS ARTICLES

A feasibility study, she said, would evaluate the nature and extent of the contamination at the property, and ascertain the risks to the environment and human health. The agency will then develop a proposed plan (with input from the community), make a decision on the matter, and move forward with remediation work.

Should that be successful, the agency will continue to monitor the land, with the eventual goal being removal from the NPL and possible re-use.

"We try to keep the community involved throughout this process, which is why we're setting up an involvement plan," White said.

The 18-acre parcel, near the town's Department of Public Works administration building, reportedly has high levels of lead, mercury and zinc in its soil. Officials believe the contamination has spread into the nearby Mine Brook.

Those who wish to learn more about the EPA's efforts are encouraged to contact St. Fleur at stfleur.marilyn@epa.gov.

Mike Gleason can be reached at 508-634-7546 or mgleason@wickedlocal.com. For news throughout the day, follow him on Twitter [@MGleason_MDN](https://twitter.com/MGleason_MDN).



EPA continuing outreach on Franklin Superfund site

Friday

Posted Oct 28, 2016 at 6:42 PM Updated Oct 28, 2016 at 6:42 PM

Share

By [Mike Gleason](#)

Daily News Staff

FRANKLIN - The federal Environmental Protection Agency will be returning to town to continue its outreach efforts on a local Superfund site.

Representatives from the agency will be at the Fisher Street Department of Public Works building on Monday, to get public comment on the BJAT, LLC property, which is also on Fisher Street.

"We will be there all day," said Marilyn St. Fleur, a community involvement coordinator for the EPA.

"We'll have an availability session for individuals who are interested in the site as well."

Agency representatives came to Franklin earlier this month and held a series of appointments to determine the best way to inform the public of developments. St. Fleur said Monday's visit would feature scheduled meetings as well, but that there would be an open session (from 2:30 p.m. to 4 p.m.) for those who simply wish to know more.

The agency added the BJAT land - previously used for rubber and plastic manufacturing - to its National Priorities List of Superfund sites on Sept. 30, 2015. The designation allows the federal government to spend money to remove contamination from the site and turn it into a usable property.

The effort is in its first stages - EPA officials have said they're looking to create a community profile for the town, to make notifying the public and getting feedback easier.

The 18-acre BJAT property has been used for industrial purposes dating back to the 1800s, though it has been inactive since 1985. Officials said the land is contaminated with lead, mercury, zinc and semi-volatile organic compounds, and that pollution has spread into the nearby Mine Brook.

APPENDIX F: SELECT NEWS ARTICLES

Those interested in finding out more may contact St. Fleur at stfleur.marilyn@epa.gov.

Mike Gleason can be reached at 508-634-7546 or mgleason@wickedlocal.com. For news throughout the day, follow him on Twitter [@MGleason_MDN](https://twitter.com/MGleason_MDN).



EPA visits Franklin to discuss Superfund site.

Monday

Posted Oct 31, 2016 at 6:35 PM Updated Oct 31, 2016 at 6:35 PM

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By [Mike Gleason](#)

Daily News Staff

FRANKLIN - Several residents - including members of the Town Council - registered their worries about a local Superfund site with federal Environmental Protection Agency officials Monday afternoon.

The discussion - about the BJAT, LLC property on Fisher Street - took place during a session with the federal agency at the DPW facility on Fisher Street.

Councilors Glenn Jones and Judith Pfeffer were among those who spoke with EPA representatives.

Marilyn St. Fleur, a community involvement coordinator with the agency, said the session was part of an ongoing effort to learn more about Franklin.

"We sent out a mailing with a factsheet about the property," she said. "We got a few people but we wanted more, so we thought an availability session would help."

Officials noted that the state is now demolishing the building on the property, a process slated to end in December. That demolition, they said, will be complete before the federal agency undertakes cleanup work. After that, the agency will take samples from the property, develop a plan and seek public comment.

Jones said he worries about security at the property.

"I actually walked the property some time ago," he said. "At the time, it was completely unsecured."

EPA project manager Kimberly White said while the agency is not directly involved in the demolition - work has been done to prevent trespassing.

APPENDIX F: SELECT NEWS ARTICLES

"There is a camera up, and they've replaced most of the fencing," she said. "People are still trespassing - they're cutting holes in the fence."

Jones also said he is worried demolition could release further contaminants.

"If you demolish the building, you change the topography, and the direction the rainwater drains," he said. "There's a chance of exposing something that may or may not already be exposed."

White said the demolition personnel would not be disturbing some of the areas with contaminants, and that measures will be taken to prevent contamination from spreading.

The subject of what the reclaimed property might look like came up. The agency members said they could not say for sure what the property would be used for, but asked what the community would like to see.

Those present said the land could help expand the town's recreational offerings.

"Unfortunately, one of our nicest pieces of property (Beaver Pond) is wedged between this property and our old dump," said Jones.

The 18-acre BJAT property has been used for industry dating back to the 19th century, and was the site of rubber and plastic manufacture before it shut down in 1985. Officials have said the land is contaminated with lead, mercury, zinc and semi-volatile organic compounds.

The land was added to the EPA's pro of Superfund in September 2015.

Mike Gleason can be reached at 508-634-7546 or mgleason@wickedlocal.com. For news throughout the day, follow him on Twitter [@MGleason_MDN](https://twitter.com/MGleason_MDN).