



**Town of Hillsborough  
Office of Community Planning  
29 School Street  
P.O. Box 7  
Hillsborough, NH 03244  
(603) 464-5378 x 227**

December 8, 2006

Environmental Management Support, Inc.  
Attn: Mr. Don West  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910

Re: Town of Hillsborough Brownfields Cleanup Grant Application

Dear Mr. West:

Enclosed please find an application for a Brownfields Cleanup Grant from the Town of Hillsborough, New Hampshire. Hillsborough, which is located in the southwestern part of the State, is primarily a rural community, but it also has an urban core with a history of industrial uses. This legacy has left several sites in the downtown, most notably the former Woods Woolen Mill, either underutilized or abandoned due to environmental contamination. Hillsborough is actively pursuing the revitalization of its downtown. Brownfields in general, and the former Woods Woolen Mill in particular, are major impediments in this effort for our small community.

The Woods Woolen Mill property has a prominent location in the downtown, bordering the south side of the Contoocook River. It consists of approximately 2.6 acres of land and is adjacent to dense mixed use and single family neighborhoods. The site is located at the eastern terminus of a section of railroad right-of-way (ROW) owned by the State of New Hampshire; the ROW, which bisects the property and has a high potential for recreational use, extends approximately ten miles and travels through two nearby towns.

The Town has recently completed a Phase I Environmental Site Assessment (ESA) and a limited Phase II ESA. The results of this assessment indicate a high risk of subsurface contamination of hazardous substances. Funding would allow the Town to mitigate hazards after a comprehensive subsurface investigation of the site is completed. The Town's ultimate goal is to clean up the site and create a park that will provide much needed access to the river and to the rail trail. The additional green space will serve as a hub of recreational activity in the heart of our downtown and will spur economic development.

**APPLICANT:** Town of Hillsborough  
29 School Street  
Post Office Box 7  
Hillsborough, NH 03244

**FUNDING REQUESTED:**

GRANT TYPE: Cleanup  
AMOUNT: \$200,000  
CONTAMINATION: Hazardous Substances (commingled with petroleum)

**LOCATION:** Town of Hillsborough, Hillsborough County, State of New Hampshire

Gary Snair, Chairman, Board of Selectmen  
Town of Hillsborough  
P.O. Box 7  
Hillsborough, NH 03244  
Tel: (603) 464-3877  
Fax: (603) 464-4270

**CONTACT:** Matthew Taylor, Community Planning Director  
Town of Hillsborough  
P.O. Box 7  
Hillsborough, NH 03244  
Tel: (603) 464-5378 x227  
Fax: (603) 464-4270  
Email: [planner@hillsboroughnh.net](mailto:planner@hillsboroughnh.net)

**DATE SUBMITTED:** December 8, 2006

**PROJECT PERIOD:** Three years

**POPULATION:** 5,402 (Source: 2005 estimate, US Census)

**COOPERATIVE PARTNERS:**

Central New Hampshire Regional Planning Commission  
Contact: Sharon Wason, Executive Director  
Tel: (603) 226-6020

Contoocook/North Branch River Local Advisory Committee  
Contact: Marian Baker, Hillsborough Representative  
Tel: (603) 478-5650

Hillsborough Area Community Service Corporation  
Contact: Tammy McClure  
Tel: (603) 464-3595

Hillsborough Chamber of Commerce  
Contact: Meg Curtis, Member, Executive Board  
Tel: (603) 478-5550 x204

Hillsborough Historical Society  
Contact: Christina Chadwick, President  
Tel: (603) 478-5500

Hillsborough Pride, Member, New Hampshire Main Street Program  
Contact: Nancy Egner Denu, Chair  
Tel: (603) 464-2953

New Hampshire Department of Resources and Economic Development  
Contact: Jennifer Codispoti, Program Specialist, Trails Bureau  
Tel: (603) 271-3254 x216

New Hampshire Department of Transportation  
Contact: Christopher Morgan, Administrator, Bureau of Rail and Transit  
Tel: (603) 271-2468

The Town is committed to the successful redevelopment of this site and has a strong coalition of stakeholders to make it happen. I look forward to completing this next phase of the project; thank you for considering this application. If you have any questions, please do not hesitate to contact me.

Sincerely,



Matthew A. Taylor  
Community Planning Director

cc: Ms. Diane Kelley, EPA Region 1

## PROJECT DESCRIPTION

### **THRESHOLD CRITERIA**

#### **A. Applicant Eligibility**

As an incorporated municipality of the State of New Hampshire, the Town of Hillsborough is eligible to receive brownfields cleanup funds as a "General Purpose Unit of Local Government."

#### **B. Letter from State Environmental Authority**

A letter from the New Hampshire Department of Environmental Services (NHDES) in support of this application is attached.

#### **C. Site Eligibility and Property Ownership Eligibility**

##### **1. Basic Site Information**

**Name of site:** Woods Woolen Mill

**Address:** 23/25 West Mill Street, Hillsborough, NH 03244

**Current Owner:** Town of Hillsborough

##### **2. Status and History of Contamination at the Site**

**Type of Contamination:** Hazardous substances (co-mingled with petroleum)

#### **Operational History and Current Uses:**

The manufacture of textiles, specifically wool, began on the site in 1880. The original mill had fifteen cards and sixty looms and manufactured woolen goods, suits, overcoats and cloaks. In the early days of the operation, part of the complex was rented and used as a silk mill. The mill was originally powered by river water from the Contoocook River via energy created by a dam that was located at the southern end of the primary mill building. By the middle of the 20th century, the mill was powered by coal which was brought in by railroad and off-loaded into a bin which was located between the Boiler House and office building. After circa 1950, the operation was powered by electricity. The flood of 1936 took out the dam and flooded the dye house and finishing rooms in the lower mill building.

In 1920, the mill had approximately 175 employees and was making woolen cloth up until 1952. During the later years, many of the mill workers walked to work via a covered wooden bridge which crossed over the Contoocook River. The closing of the mill in 1952 was devastating to the town as it was the main industry, having employed approximately 325 persons at its peak. In 1956, the machinery, tools and equipment were sold at auction to Edmund Woods at which time the mill was renamed Woods Woolen Mill and continued to manufacture wool, synthetic yarns (i.e. acrylic) and later silk textiles. By the 1950s, woolen manufacturing was greatly reduced and operations continued primarily only in the main section of the mill building. The mill closed its doors and ceased all production in the mid 1980s.

After the closing of the mill, the site became an attractive nuisance and was visited by the

Hillsborough Police Department on numerous occasions due to trespass, underage drinking, vandalism, illegal dumping, and even several arson attempts. The covered bridge, which was crossed by trains and mill workers alike for almost 100 years, was destroyed in an arsonist's fire in 1985. There is recent evidence of vandalism and trespass on the site, including evidence of forced entry into the buildings.

The railroad ROW has been used in the past for recreation (hiking and biking), but this use is currently much less viable due to the condition of the property. There are three structures still standing on the site: a decaying boiler house, a warehouse building in a partial state of collapse and an office building in a state of serious disrepair. The open foundation of the original mill, which is littered with debris, is all that remains of that structure. The town acquired the property by tax deed in December 2004. The site is unoccupied and is un-useable in its present physical condition and it poses a serious threat to the environment and to public health, safety and welfare.

### **Environmental Concerns:**

Previous studies confirmed that the site is contaminated with asbestos containing material (ACM) and that the clapboards on the remaining buildings and the wood debris are contaminated with lead based paint (LBP). The recently-completed Phase I ESA identified the presence of other potential contaminants including petroleum, herbicides/pesticides, metals, petroleum, polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), and volatile organic compounds (VOC). A limited Phase II ESA has been completed, but additional subsurface investigation can not be undertaken until the buildings near collapse and the contaminated debris have been removed.

### **Mode and Extent of Site Contamination**

Due to the variety of past industrial uses, the site would have become contaminated in a number of different ways. ACM and LBP were used during construction of the buildings on the site and contamination would have occurred during construction and also during the demolition of the main mill building, as well as occurring gradually during the decay and collapse of the other buildings. Herbicides and pesticides were routinely sprayed within and alongside railroad ROWs; this may have served as a route for site contamination. The railroad ROW and the former dye house may also be a source of metal contaminants. Petroleum products were stored on the site in barrels and in underground storage tanks (USTs), providing another mode of contamination. PAH contamination may have occurred along the railroad ROW, as well as in the area of the former coal bin. Three large transformers that were located on the site may have contained oil with PCBs and might also be a source of contamination. Drums removed from the site in a past joint effort of NHDES and EPA indicate the possibility of VOCs (including solvents) as well.

The extent of subsurface contamination is unknown. A comprehensive subsurface investigation is not possible until existing buildings and ACM and LBP-contaminated building debris is removed.

### **3. Sites Ineligible for Funding**

The site is not listed or proposed for listing on the National Priorities List; it is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial

consent decrees issued to or entered into by parties under CERCLA; and it is not subject to the jurisdiction, custody, or control of the United States Government.

**4. Sites Requiring a Property-Specific Determination**

Based on Appendix 3, Section 3.4 of the Proposal Guidelines, the site does not require a property-specific determination in order to be eligible for funding. The site/property under the name "Woods Woolen Mill" located at 25 West Mill Street is listed as "closed" on CERLCIS under the number NHD986467777 as of July 25, 2006. The database report indicates that non-NPL assessment and removal was conducted and financed by the USEPA.

**5. Environmental Assessment Required for Cleanup Proposals**

A Draft Phase I ESA, written in accordance with ASTM E1527-05, was completed in November, 2006. The report was finalized on December 7, 2006. A limited Phase II ESA was completed, but additional subsurface investigation is impossible until the dilapidated buildings and contaminated debris are removed from the site.

**6. Liability for Contamination**

The Town of Hillsborough is not potentially liable for contamination at the site under CERCLA Section 107. All disposal of hazardous substances at the site occurred before the Town acquired the property. The Town did not cause or contribute to any release of hazardous substances at the site. The Town of Hillsborough has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**7. Enforcement Action**

There are no known ongoing or anticipated environmental enforcement actions related to the site. The Town is not aware of any inquiries or orders related to the responsibility of any party for the contamination of the site.

**8. Information on Liability and Defenses/Protections Where Applicant Owns the Site**

**Property Acquisition**

The property was acquired by the Town from Leon Griffin III on December 22, 2004 by foreclosure for failure to pay property taxes. The Town of Hillsborough has no familial, contractual, corporate, or financial relationship with any prior owner, operator, or other potentially responsible party of the property, including Leon Griffin III.

**Timing of Hazardous Substance Disposal**

All disposal of hazardous substances at the site occurred before the Town acquired the property. The Town did not cause or contribute to any release of hazardous substances at the site. The Town of Hillsborough has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

**Pre-Purchase Inquiry**

The Town was very familiar with the property and did not make any special inquiries prior to foreclosure. The extent of contamination was not known prior to acquisition, and it will not be

fully known until funding is available for further assessment.

### **Post-Acquisition Uses**

The property has been vacant and unused since acquisition.

### **Continuing Obligations**

The Town's primary focus after acquisition of the site was to secure it and limit access. The buildings' doors and windows have been boarded up. Access to the site can not be completely restricted by the Town, however, because an abutter has an easement on part of the site's driveway and the State of New Hampshire controls access to the railroad ROW. Household waste and junk vehicles left by the previous owner have been removed and disposed of properly. Eviction of the previous owner occurred a considerable time after acquisition and hindered the process of cleanup and securement.

The Town of Hillsborough is committed to:

- complying with all land use restrictions and institutional controls;
- assisting and cooperating with those performing the assessment and cleanup and to provide access to the property;
- complying with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
- providing all legally required notices.

### **D. Cleanup Authority and Oversight Structure**

#### **1. Oversight**

The Town will enlist the services of a qualified environmental consulting firm. The Town uses a Qualifications-Based Selection process when contracting with consultants.

#### **2. Access to Adjacent Properties**

If warranted to assess the extent of a release of hazardous materials from the site, the Town will seek access to adjacent privately-owned properties. Access agreements outlining the planned objectives, scope and timing of work will be prepared. All contractors performing work will be required to provide proof of insurance.

### **E. Cost Share**

The Town will provide a variety of in-kind services to cover most, if not all of the twenty percent cost share. The Town will provide the use of equipment and personnel for the project for police details, trucking, outreach and the like. The Town will make up any difference with a financial contribution to be raised by the voters at the Annual Town Meeting.

## **RANKING CRITERIA FOR ASSESSMENT GRANTS**

### **A. Cleanup Grant Proposal Budget**

<b>Budget Categories (programmatic costs only)</b>	<b>Task 1 Community Involvement</b>	<b>Task 2 Demolition Contaminated Debris Excavation</b>	<b>Task 3 Contaminated Soil/Debris Disposal</b>	<b>TOTAL</b>
Personnel				
Fringe Benefits				
Travel				
Equipment				
Supplies	\$2,500			\$2,500
Contractual	\$2,500	\$80,000	\$115,000	\$197,500
Other				
<b>TOTAL</b>	<b>\$5,000</b>	<b>\$80,000</b>	<b>\$115,000</b>	<b>\$200,000</b>
In-Kind Services	\$20,000	\$7,500	\$12,500	\$40,000

The proposed cleanup of the site involves three primary tasks. The first task is development and implementation of a community involvement plan. The Town will provide resources to prepare newsletters, post public meeting notices, hold quarterly public meetings, and develop an informational repository. The Town will contract with an environmental consultant to support these services. The second task is selected demolition of failing, dangerous structures and abatement and removal of hazardous material - impacted debris. The Town will contract with a qualified environmental contractor to provide these services and will provide health monitoring, site security, and other in-kind services. The third task is disposal of contaminated soil and debris. Petroleum, heavy metal (i.e. lead), asbestos, and polycyclic aromatic hydrocarbon contaminated soils were discovered during the on-going Phase II assessment. Substantial amounts of hazardous material contaminated building structures that are in serious disrepair (some in complete collapse) with increasing an increasing threat of spreading hazardous material are present at the site and require cleanup to address this threat.

### **B. Community Need**

#### **1. Description of Target Community**

The Town of Hillsborough is a small rural community in southwestern New Hampshire. Within the Town, industrial sites developed along the Contoocook River in the 19<sup>th</sup> Century and around these sites, including the subject property, a dense urban village was formed. The village



is composed primarily of mixed use (commercial/multifamily) buildings, modest single family homes, and tenement houses. Many of the buildings in the downtown are underutilized and poorly maintained.

According to the 2000 Census, the Town of Hillsborough as a whole had a median household income of \$44,500. This did not compare favorably to Hillsborough County which had a median household income of \$53,384. In fact, it has been determined that 44.4 % of the population falls into the low/moderate income category (*Census 2000 Low and Moderate Income Summary Data*). Although data does not exist specifically for the downtown area, income levels are likely to be considerably lower due to the predominance of low-rent, run-down tenement houses. There is a significant population of children and teenagers in close proximity to the mill site that is negatively impacted by this property as noted previously.

The Town's industrial legacy has left it with many financial commitments disproportionate to its size for maintaining and improving infrastructure. This fact, when coupled with a stagnant downtown tax base, make it very difficult for the Town to expand its financial commitments to include cleanup of this site.

## **2. Benefit to Targeted Community**

Some of the poorest households in our community are located near this brownfields site. The redevelopment of this site will benefit the targeted community in numerous ways. It will eliminate significant health hazards due to site contamination, including the risk for children of direct exposure to ACM and LBP contaminants. Removing the blight will help to spur further economic activity in the downtown which will lead to job creation. Cleaning up the site will encourage better maintenance of surrounding properties; it will also inspire building rehabilitation projects that will provide additional, better quality, affordable housing. The targeted community has very limited access to greenspace. The proposed use will provide much needed public open space in the downtown with access to the river and to the recreational trail. The community's access to these two important amenities is currently severely restricted. Access will also have an added health benefit, giving members of the community a safe, attractive place to walk or ride a bicycle.

## **3. Impact of Brownfields on Community**

The Phase I ESA for this property identified numerous potential brownfields within close proximity to the site. There were four sites near the subject property listed in the Resource Conservation and Recovery Information System (RCRIS) as generators of hazardous waste. Four nearby properties are found on the EPA's Emergency Response Notification System (ERNS) list. Seventeen properties were identified as being on the Groundwater Hazardous Waste Inventory Sites List within a one-mile radius of the mill property; this list is maintained by NHDES. Eighteen properties were identified to be on the New Hampshire Hazardous Material Spills List within ¼-mile radius of the site; this list is maintained by the New Hampshire Office of Emergency Management (NHOEM). Finally, nine properties were identified to be on the New Hampshire Leaking Underground Storage Tanks (LUST) List within ½-mile radius of the subject property.

The impact of brownfields on Downtown Hillsborough is very significant and disproportionate considering the size of the Town. The cycle of urban decline caused by abandoned brownfields is very evident in our community. The economic impact is demonstrated by the vacant

storefronts, disuse of upper floors, and overall poor property maintenance that is prevalent in the downtown. While the health impacts of brownfields in Town have not been fully assessed, the sheer number of contaminated sites would suggest that it is very significant. The environmental impact is spread both locally and regionally through the degradation of groundwater and surface water quality. Alarms have been raised in recent years at the decline in water quality of the Merrimack River, and its tributary, the Contoocook River. It should be noted that the City of Concord, the State Capital, is downstream from this site and uses the Contoocook River to supplement its water supply on a regular basis. Textile mills, and their ancillary industrial uses, which once lined these rivers, continue to pollute even after the mill operations have long since closed.

### **C. Sustainable Reuse of Brownfields**

#### **1. Pollution Prevention and Reduction of Resource Consumption**

Financial support for this project will help to prevent pollution in a number of ways. Removing the debris and buildings will eliminate the potential for friable asbestos being released into the air. Removing LBP-contaminated material, as well as mitigating subsurface contaminants, will eradicate pollution from stormwater runoff from the site, which discharges into the Contoocook River that is in turn used as a public drinking water supply downstream. LBP-contaminated material and subsurface contaminants will no longer leach into the groundwater as well. This success will serve as a model for other local brownfields sites and will help prevent future ones through community education.

The project will also aid in the goal of reducing resource consumption. Construction materials will be reused for the redevelopment of the site. The quarried granite and other stone from the foundations will be used for retaining walls that will be necessary for redevelopment due to topography. Bricks from the boiler house can be used as paving stone for the park. The small office building, which is the only viable structure on the site, will be repaired with local support and used as a community facility; the building will be rehabilitated to meet current energy efficiency standards. The project will also help to reduce the reliance on fossil fuels by encouraging in-fill development and redevelopment in the downtown, rather than automobile-oriented sprawl. By opening access to the rail trail, which extends approximately ten miles through three towns, the project also promotes alternative modes of transportation other than motor vehicles.

#### **2. Economic Benefits**

The Town will reap multiple economic benefits if this project is funded. Efforts to revitalize the downtown are beginning to bear the fruit of success; each new project acts as a catalyst for others and a small initial investment garners big rewards in the form of an expanded tax base. By removing blight and replacing it with an attractive greenspace, the project will encourage more redevelopment that will take advantage of the amenity. The public open space and river access will enhance property values in the downtown. This project would also help Hillsborough promote its downtown as a tourist destination by providing access to the river and to the recreational trail within its central core. Redevelopment and increased tourism create jobs that can help replace the ones that were lost when the mill closed.

### **3. Promoting Vibrant, Equitable, and Healthy Community**

Redevelopment of the mill site will promote a vibrant, equitable, and healthy community. The addition of greenspace in the downtown will encourage foot and bicycle traffic to and from the site. It will also encourage the use of the trail and will potentially bring visitors from other towns. The removal of the blight on this property will enhance the downtown's potential as a tourist destination.

Cleaning up the site will promote an equitable community by eliminating serious health hazards that threaten some of the most vulnerable in our community, including children and families of modest means. This project will spur future redevelopment which will provide additional, better quality, affordable housing.

The end result will be a healthier community. The physical health of citizens will be protected by removing contaminants on the site that pose serious health risks. Providing greenspace for residents also promotes their physical health by providing a location for recreation and exercise. The economic health of the community will benefit from the clean up and redevelopment of the site. The project will act as a catalyst for future redevelopment and will lead to job creation. Finally the environmental health of the community will improve by removing contaminants that threaten air, groundwater, and surface water quality.

### **D. Creation and/or Preservation of Greenspace/Openspace or Nonprofit Purpose**

This proposal will create much needed public open in the heart of the downtown. It will provide access to the river and to the rail trail, which is currently severely restricted. The site will be integrated into the Town's park system. The Town has a Park Board that oversees maintenance, and Parks Department staff. The cost of long term maintenance and care for the site will be included in future Town operating budgets. The State of New Hampshire owns the railroad ROW and it will also be involved in maintenance. The State Bureau of Trails will likely assist the Town in maintaining the rail trail.

### **E. Pre-Award Community Notification**

#### **1. Notification of Targeted Community**

At two past, duly noticed Annual Town Meetings, the voters approved funds for work related to the mill property. At the Annual Town Meeting in March, 2006, voters approved an expenditure of \$10,000 to hire a firm to conduct a Phase I and limited Phase II ESA and assist the Town in preparing a brownfields grant applications for the site. Notice of intent to make this application was given nearly a year ago, and the voters of the Town of Hillsborough overwhelmingly supported it.

The Town held a pre-application meeting on December 5, 2006 to again give notice of intent to apply for a brownfields cleanup grant and to solicit comments and ideas. A notice for this meeting was posted at the Town Office and the Post Office and on the Town's web site on November 21, 2006. An article, with the notice, was published in a local weekly newspaper on November 30, 2006. Cooperative partners were personally notified of the meeting by phone and/or email. Drafts of the application and the Phase I ESA were made available at the Town Office and were distributed and discussed at the pre-application meeting. Ideas put forth at this meeting were incorporated into the final application.

A pre-award meeting is anticipated to be held in mid January. A thirty day comment period

will be provided prior to this meeting. Notices will be posted in the same manner as described above. As new stakeholders/partners are identified, they will be added to a list to be contacted personally for any upcoming meeting. This meeting will be a brainstorming session with stakeholders to identify additional resources that can be leveraged for this project.

## **2. Justification of Notification Method**

The methods for notification were designed to reach the widest audience and catch the attention of stakeholders and cooperative partners. The physical postings of notices were located in the normal places for legal notices where people would look to become informed of public meetings. The free weekly newspaper, where notice was published, is widely read in town. The notice was published in the form of an article with a headline and a reporter's comments to gain the attention of the reader. Personal contact is critical to maintain involvement with stakeholders and cooperative partners, some of whom do not live or work in Hillsborough. This is particularly important for regional and State officials involved in the project. These methods of notification will continue to be used as the project progresses.

## **3. Comment Period**

The comment period for the pre-application meeting was less than two weeks due to the Thanksgiving holiday. The comment period for the pre-award meeting will be thirty days. Outreach will be in the form of personal phone calls, emails, press releases and posted notices.

## **4. Plans for Addressing Comments**

Comments, ideas, and new information that were received by the pre-application meeting were directly incorporated into the final application. Additional stakeholders were identified who will be contacted.

Comments received by the pre-award meeting will be incorporated into a draft Phase II ESA scope of work. Newly identified partners/stakeholders will be contacted and potential leveraged resources will be explored.

## **F. Ongoing Community Involvement**

### **1. Community Involvement Plans**

The Town will ensure continued community involvement during all phases of this project by doing the following:

- Forming a steering committee of partners/stakeholders,
- Expanding the contact list of stakeholders/partners and notifying all on the list of upcoming events or meetings directly by phone or email; listed contacts will receive copies of all pertinent documents related to the project,
- Developing a web page for the project,
- Encouraging media coverage and promoting community education for the project and for the brownfields program,
- Posting all notices at normal locations for legal notices, in the local newspaper, and on the Town's web site,
- Holding neighborhood meeting(s) advertised with flyers delivered door to door to aid in soliciting residents' input.

To date, the community has supported clean up and assessment of the mill site by voting overwhelmingly to expend funds on the property at two past Annual Town Meetings. At the Annual Town Meeting in March, 2006, voters approved an expenditure of \$10,000 to hire a firm to conduct a Phase I ESA and assist the Town in preparing a brownfields grant application for the site. A pre-application meeting was held on December 5, 2006 to solicit input regarding the draft application.

## **2. Partnership Development**

The Town has been successful in the past in forming partnerships directly related to the clean up of this site and it will continue to do so in the future. In 1999, when it became apparent that the demolition initiated at the mill site posed an immediate threat to public health and safety, the Town formed a partnership with NHDES, New Hampshire Department of Transportation (NHDOT), EPA, and the New Hampshire Attorney General's Office that resulted in direct action. The outcome of this partnership was the removal of the most immediate threats on the site.

The Town has sought partners that have a direct stake in the redevelopment of the site in preparing for this application. State agencies that own and manage the railroad ROW have been enlisted. The regional planning commission was contacted due to the potential regional impact of contamination, particularly upon the City of Concord's supplemental water supply downstream. The Contoocook/North Branch River Local Advisory Committee, an organization with a goal of enhancing the water quality and natural, scenic, cultural, and recreational values of the river, was enlisted for obvious reasons. Organizations with an interest in economic development were contacted and enrolled as partners for this project. The local historical society was also enlisted due the importance of this site and its past uses to the Town. It is critical that all stakeholders are brought to the table in order to bring about a sustainable redevelopment of the site. As the project progresses, new stakeholders will inevitably be identified and they will be welcomed as partners.

## **3. Plan for Communicating Progress of Projects**

The Town will post progress reports on the project's web site. Press releases will also be sent to local newspaper(s) to inform residents of progress. Newsletters will be sent out at six month intervals via bulk mail to keep residents informed. Also a progress report of the project will be given in the Annual Town Report.

## **4. Community-based Organizations Involved in Project**

Central New Hampshire Regional Planning Commission

Contact: Sharon Wason, Executive Director

Tel: (603) 226-6020

*CNHRPC advises local governments in the greater Concord, NH area with regional land use issues.*

Contoocook/North Branch River Local Advisory Committee

Contact: Marian Baker, Hillsborough Representative

Tel: (603) 478-5650

*CNBRLAC is committed to the enhancement of water quality and natural, scenic, cultural, and recreational values of the river.*

Hillsborough Area Community Service Corporation

Contact: Tammy McClure, Chair

Tel: (603) 464-3595

*HACSC is a 501(c)(3) umbrella agency dedicated to serving a wide range of community needs.*

Hillsborough Chamber of Commerce

Contact: Meg Curtis, Member, Executive Board

Tel: (603) 478-5550 x204

*HCofC is a local business development organization.*

Hillsborough Historical Society

Contact: Christina Chadwick, President

Tel: (603) 478-5500

*HHS is a local organization involved in historic preservation.*

Hillsborough Pride.

Contact: Nancy Egner Denu, Chair

Tel: (603) 464-2953

*Organization committed to revitalization of downtown Hillsborough. Member of the New Hampshire Main Street Program.*

New Hampshire Department of Resources and Economic Development

Contact: Jennifer Codispoti, Program Specialist, Trails Bureau

Tel: (603) 271-3254 x216

*NHDRED is the State economic development agency and manages trails program.*

New Hampshire Department of Transportation

Contact: Christopher Morgan, Administrator, Bureau of Rail and Transit

Tel: (603) 271-2468

*NHDOT has multiple responsibilities, including ownership and management of former railroad ROWs.*

## **G. Reduction of Threats to Human Health and the Environment**

### **1. Reducing Risks Associated with Brownfield Site Contaminants**

The proposed brownfields cleanup project at the former Woods Woolen Mill site will provide a substantial reduction in serious threats to human health and the environment. The location of the property, being in close proximity to a dense residential neighborhood and the Contoocook River, presents a serious hazard to public health and safety. It poses risks to both human health and the environment. In particular, in its current state, the site presents a threat of exposure to

asbestos, heavy metals, lead paint, carcinogenic PAHs and other potential contaminants such as chlorinated solvents and PCBs. There is a wide range of reasons why the exposure potential at the site is high. Pollutants have impacted and potentially permeated surface soils that are accessible to people and environmental receptors. Clear evidence of trespassing is observable, indicating that potentially large numbers of people may be visiting the site; reports from the Hillsborough Police Department confirm this. The risk of direct exposure of children to contaminants is particularly high due to the site's status as an attractive nuisance. Conditions at the site are worsening because of the continuing decline in the structural integrity of the buildings, and because on-going releases of asbestos and lead from building material are occurring with serious potential for air-borne contaminants spreading to nearby properties. As conditions at the site continue to worsen, there is also increased potential for contaminants to impact the adjacent river. Not only is there likely subsurface discharge of contaminated groundwater to the river, which cannot be assessed because of the severe safety risks posed by dilapidated structures, but also an increased risk of complete collapse of portions of the contaminated buildings directly into the river. With continued exposure of the interiors of the buildings and contaminated debris to weather, the potential for direct discharge of contaminants to the river through run-off increases. It is important to note that the Contoocook River is used downstream as a source of public drinking water.

The Phase I ESA identified several environmental issues involving releases and potential releases of hazardous materials. Former activities at the site included the storage of drummed materials with several rusted drums still on-site; the use of coal as fuel for boilers with associated ash disposal; the use of dyes likely containing heavy metals; the use of pesticides and/or herbicides in the woolen materials, the use of asbestos containing building materials (as discussed above); and the use of lead paint on the structure. Transformers formerly present on site had the potential to contain polychlorinated biphenyls. The on-going Phase II ESA included the sampling of soil for laboratory analysis that revealed elevated concentrations of antimony, arsenic, beryllium, lead, benzo(a)anthracene, and benzo(a)pyrene.

The former mill complex is structurally unsound with portions of buildings partially demolished or collapsed. The collapsed structures have resulted in releases of asbestos and lead paint to the surrounding area, substantially increasing the potential for exposure to these and other hazardous materials at the site.

EPA cleanup grant funds would be used by the Town to abate lead paint and asbestos, complete demolition of contaminated structures and to abate any other contaminants identified in a Phase II ESA in order to eliminate the health and safety threats.

## **2. Intergovernmental Cooperation to Protect Public Health and Environment**

Following the start of the demolition of the mill in 1999, it became very apparent that the activity at the site posed an immediate threat to the health and safety of those performing the work as well as to public health and safety. The Town partnered with NHDES, NHDOT, EPA, and the New Hampshire Attorney General's Office to deal with the situation; this partnership resulted in the successful abatement of the imminent hazards caused by the demolition activity. Serious threats still exist and the Town will continue to work with appropriate agencies, such as the ones noted above, to mitigate the hazards on the site once and for all.

## **3. Describe Proposed Cleanup**

The first phase of the physical clean up of the site will involve selected demolition of failing, dangerous structures and abatement and removal of hazardous material - impacted debris. The Town will contract with a qualified environmental contractor to provide these services and will provide health monitoring, site security, and other in-kind services. Disposal of contaminated soil and debris will occur in the final phase. Petroleum, heavy metal (i.e. lead), asbestos, and polycyclic aromatic hydrocarbon contaminated soils were discovered during the on-going Phase II assessment. Substantial amounts of hazardous material contaminated building structures that are in serious disrepair (some in complete collapse) with increasing an increasing threat of spreading hazardous material are present at the site and require cleanup to address this threat. The approximate cost of cleanup is \$200,000.

## **I. Leveraging of Additional Resources**

### **1. Other Available Town Funds and Resources**

At past Annual Town Meetings, Hillsborough has raised \$29,000 for assessment and cleanup of the site. Additional funds may be raised at future Town Meetings, as warranted. The Town will also commit staff time to meet the assessment needs not met through this grant. The Town Health Officer will review and sign off on the scope of work for the Phase II ESA. The Town's Planning Director will act as the project manager. Planning Department staff will manage the outreach program and provide administrative support.

### **2. Ability to Leverage Funds**

The Town will actively pursue other sources of funds to make up any shortfall not covered by the grant. Two cooperative partners, NHDRED and NHDOT, have funding sources that could be applied to this project. The Town will request assistance from the two local economic development agencies that are cooperative partners, the Hillsborough Chamber of Commerce and Hillsborough Pride, in raising funds from private individuals and corporations. Funding opportunities through NHDES will be explored and that agency's assistance will be requested for air and water quality monitoring. As the project has a major transportation component by which an alternative mode of transit will be provided, the Planning Department may pursue federal Transportation Enhancement (TE) and Congestion Mitigation and Air Quality (CMAQ) funds. The Planning Department will also investigate funding opportunities through the New Hampshire Community Development Finance Authority (NHCDFA).

## **J. Programmatic Capability**

### **1. Ability to Manage Grant**

The Town's Planning Director, Matthew Taylor, will act as the project manager. Mr. Taylor has a Masters of Science degree in Urban and Regional Planning and ten years of experience successfully managing land development projects, including ones that were federally funded. Three additional Town administrative staff members will assist with project management. The Town uses a Qualifications-Based Selection (QBS) process when contracting with consultants and would use this method when acquiring additional expertise for this project.



**2. History of Managing Federal Funds**

The Town of Hillsborough has successfully managed funds from a variety of federal sources, including the Transportation Enhancement Program (TEP), the Federal Emergency Management Agency (FEMA), and the Community Development Block Grant Program (CDBG). The Town has always complied with all audit requirements and has never had an adverse finding from any audit. The Town's accounting system is audited annually. The Town has never had to comply with any special "high risk" terms or conditions for grants from any agency. The Town has an "A" bond rating from Standard and Poor's.

**3. Past Brownfields Cooperative Agreements or Other Federal Assistance Agreements**

The Town has never been the recipient of an EPA Brownfields cooperative agreement or of any other federal assistance agreement.

**4. Plans for Tracking and Measuring Progress**

A project review team consisting of the Town Engineer, Finance Manager, Health Officer, and Planning Director will be established. The team will meet at a minimum on a monthly basis to review the schedule, overall budget, and general progress of all aspects of the project. The project manager will use Microsoft Project for tracking and will develop a scope of work, project time line with milestones, a detailed budget with a schedule of costs, an analysis of stakeholders, and a risk management plan, as needed. Consultants will be required to provide weekly status reports that will include the percent of work completed to date.



The State of New Hampshire  
**Department of Environmental Services**



December 5, 2006

Carol Tucker  
US Environmental Protection Agency  
Region 1, New England  
One Congress Street, Suite 1100 (HIO)  
Boston, MA 02114-2023

**Subject:** Brownfields Assessment Grant Proposal  
Town of Hillsborough, New Hampshire

Dear Ms. Tucker:

I am writing on behalf of the New Hampshire Department of Environmental Services (NHDES) to express support for the Brownfields Assessment Grant Proposal being submitted by the Town of Hillsborough. Hillsborough hosts a rich history and several historic landmarks, including the home of the 14th U.S. President, Franklin Pierce, but has not escaped the impacts of abandoned brownfields. The Town has already made progress revitalizing its downtown area by promoting a comprehensive redevelopment strategy, and now wishes to further that progress by targeting redevelopment of the Woods Woolen Mill property ("property") as a recreational park and greenspace.

The property was formerly home to a 19<sup>th</sup> century textile mill located immediately adjacent to the scenic Contoocook River and a recreational right-of-way maintained by the NH Department of Transportation. This setting and the site's proximity to Hillsborough's village center make it an ideal location for recreational redevelopment.

NHDES and the U.S. Environmental Protection Agency have worked closely with the Town in the performance of remedial actions at the property, which were conducted in 1999 and 2000. These actions included removal of drums and containers of petroleum and hazardous wastes stored within the main mill building and removal of asbestos containing materials from within the former boiler room. Despite these actions, comprehensive site investigations have yet to be conducted. The proposed grant activities will complete this work and enable an appropriate remedial action plan to be developed, thereby positioning the property for successful cleanup and redevelopment.

In closing, I wish to confirm NHDES's support for the Town of Hillsborough's application for brownfields assistance, and encourage your positive consideration of their proposal.

Carol Tucker  
Brownfields Assessment Grant Proposal  
December 5, 2006  
Page 2 of 2

If you have questions about NHDES's support of this proposal, please do not hesitate to contact me at (603) 271-2908. Thank you.

Sincerely,

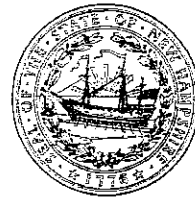
A handwritten signature in black ink, appearing to read "Michael J. Wimsatt", with a stylized flourish at the end.

Michael J. Wimsatt, P.G.  
Brownfields Coordinator  
Waste Management Division  
Tel: (603) 271-6422  
Fax: (603) 271-2181  
Email: [mwimsatt@des.state.nh.us](mailto:mwimsatt@des.state.nh.us)

cc: Matthew Taylor – Community Planning Director, Town of Hillsborough



The State of New Hampshire  
*Department of Environmental Services*



December 5, 2006

Carol Tucker  
US Environmental Protection Agency  
Region 1, New England  
One Congress Street, Suite 1100 (HIO)  
Boston, MA 02114-2023

**Subject:** Brownfields Cleanup Grant Proposal  
Town of Hillsborough, New Hampshire

Dear Ms. Tucker:

I am writing on behalf of the New Hampshire Department of Environmental Services (NHDES) to express support for the Brownfields Cleanup Grant Proposal being submitted by the Town of Hillsborough. Hillsborough hosts a rich history and several historic landmarks, including the home of the 14th U.S. President, Franklin Pierce, but has not escaped the impacts of abandoned brownfields. The Town has already made progress revitalizing its downtown area by promoting a comprehensive redevelopment strategy, and now wishes to further that progress by targeting redevelopment of the Woods Woolen Mill property ("property") as a recreational park and greenspace.

The property was formerly home to a 19<sup>th</sup> century textile mill located immediately adjacent to the scenic Contoocook River and a recreational right-of-way maintained by the NH Department of Transportation. This setting and the site's proximity to Hillsborough's village center make it an ideal location for recreational redevelopment.

NHDES and the U.S. Environmental Protection Agency have worked closely with the Town in the performance of remedial actions at the property, which were conducted in 1999 and 2000. These actions included removal of drums and containers of petroleum and hazardous wastes stored within the main mill building and removal of asbestos containing materials from within the former boiler room. Despite these activities, further remedial actions are required, including abatement and removal of asbestos-containing materials from site structures and debris piles. Award of this grant request will make this work possible and enable the Town to create a valuable recreational space for the local community.

In closing, I wish to confirm NHDES's support for the Town of Hillsborough's application for brownfields assistance, and encourage your positive consideration of their proposal.

Carol Tucker  
Brownfields Cleanup Grant Proposal  
December 5, 2006  
Page 2 of 2

If you have questions about NHDES's support of this proposal, please do not hesitate to contact me at (603) 271-2908. Thank you.

Sincerely,

A handwritten signature in black ink, appearing to read "Michael J. Wimsatt", with a stylized flourish at the end.

Michael J. Wimsatt, P.G.  
Brownfields Coordinator  
Waste Management Division  
Tel: (603) 271-6422  
Fax: (603) 271-2181  
Email: [mwimsatt@des.state.nh.us](mailto:mwimsatt@des.state.nh.us)

cc: Matthew Taylor – Community Planning Director, Town of Hillsborough

CNBRLAC  
(CONTOOCCOOK AND NORTH BRANCH RIVERS LOCAL ADVISORY COMMITTEE)



6 December, 2006

To Whom it May Concern

REF: SUPPORT OF HILLSBORO'S APPLICATION FOR BROWNFIELD GRANTS

We were glad to hear of the town of Hillsborough's application for Brownfield grants to complete an environmental assessment and a cleanup of the old woolen mills along the river in downtown Hillsboro.

Our committee is strongly in favor of this application and glad to be a cooperative partner in this endeavor.

The mills are in bad shape and a potential hazard to the river. Based on the recent experience of the town of Antrim where a loose piece of construction plywood was able to destroy the dam and bridge in their downtown, the deteriorating old mill in Hillsboro has a greater potential of causing significant damage to the dam, bridge, and to the river downstream of the site. We encourage Hillsboro in its efforts to get this site cleaned up as soon as possible.

Since at least one downstream town, (the City of Concord) gets much of its water supply from the river, we are also grateful for any efforts being made to remove pollution and potential pollution from the river.

The famous freight train rapids (a section of the river that is well known for kayaking and rafting, as well as for trout fishing) is located just below this site. We feel that making the site into a park with an access to the river, is a very applicable use of this property.

We hope you will give an opportunity to this small town of Hillsboro to begin their cleanup work soon.

Thank you,

On behalf of CNBRLAC

  
Marian K. Baker, CNBRLAC Secretary

10 Crosby Rd  
Hillsborough, NH 03244

phone: 603-478-5650  
email: mkbaker@mcttelecom.com

Serving the towns of Antrim, Bennington, Boscawen, Concord, Contoocook, Deering, Greenfield, Hancock, Henniker, Hillsborough, Hopkinton, Jaffrey, Penacook, Peterborough, Stoddard, Rindge