

EPA Community Relations Plan
Long Falls Paperboard
161 Wellington Road
Brattleboro, Vermont 05301

EPA RFA 19093
Vermont DEC Site #2018-4828

March 15, 2021

Prepared For:



76 Cotton Mill Hill
Brattleboro VT 05301
www.brattleborodevelopment.com

Prepared by:



21 North Main Street
Waterbury, Vermont 05676
(802) 917-2001
www.leenv.net

LEE #18-122



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A. Overview and Background

This document is a Community Relations Plan (CRP) for Long Falls Paperboard, 161 Wellington Road, Brattleboro, Vermont (Site, Brattleboro Town Parcel ID# 00080026.000, Vermont Department of Environmental Conservation (DEC) Site #2018-4828). The property consists of a 39.52-acre parcel with an active paperboard manufacturing facility, at the north end of Wellington Road in Brattleboro, Vermont (see Appendix A). Brattleboro Development Credit Corporation (BDCC) owns the Site. Long Falls Paperboard began operating on the Site in late 2018, and continues to operate as of the date of this CRP.

Nature of Threat to Health and Environment

Contaminated soil and other environmental media are present at the Site, including wastewater holding basin sludge, shallow and deep soils. The holding basin sludge will be disposed of at an off Site licensed facility. Cleanup of the unused lagoon will eliminate environmental exposure to waste paper sludge. Additionally, the area currently occupied by the holding basin lagoon will be available to Long Falls Paper for other purposes, potentially making the Site more usable.

Prior releases included fuel oil released to deep soils from underground storage tanks, and releases to shallow soils from the nearby railway line. The shallow and deep contaminated soils do not impact sensitive receptors, and will be addressed via institutional controls.

Previous Reports

Several previous reports are on file with the Vermont DEC and at BDCC's on line repository: <https://brattleborodevelopment.com/development-services/long-falls-paperboard-epa>

A Phase I Environmental Site Assessment (ESA), a Phase II ESA, and a Corrective Action Investigation were completed in the last 24 months. The Phase II ESA included soil, groundwater and sludge sampling and testing. The Corrective Action Investigation included holding basin sludge and soil sampling and testing, and groundwater sampling and testing. An Evaluation of Corrective Action Alternatives (ECAA) was approved by the DEC on December 14, 2020 and a Corrective Action Plan (CAP) was approved by DEC on February 2, 2021. The current estimate for the cleanup work is approximately \$480,000. The work is planned for the spring of 2021.



B. Community Relations Plan

This CRP is a requirement for utilizing EPA Brownfields Cleanup Grant funding for the cleanup. The CRP is necessary because BDCC has a \$500,000 EPA Brownfields Cleanup Grant that will be used to decommission the unused holding basin lagoon. The CRP outlines the public process to date and forthcoming, and how the Town has involved, and will continue to involve, local residents and organizations in the decision-making process regarding the environmental cleanup at the Site. The successful environmental cleanup and subsequent reuse hinges on informed citizen and local government involvement.

C. Spokesperson and Information Repository

The spokesperson for this project is Bobbi Kilburn, Director of Finance and Grant Management for BDCC. BDCC has been working with LE Environmental (LEE) on the environmental cleanup. Contact information is as follows:

Bobbi Kilburn
Brattleboro Development Credit Corporation
76 Cotton Mill Hill
Brattleboro VT 05301
(802) 257-7731
bkilburn@brattleborodevelopment.com

D. Chronology of Community Involvement

In support of BDCC's EPA Brownfields Cleanup Grant application, a public meeting to discuss the cleanup funding was held at BDCC's offices at 76 Cotton Mill Hill on January 15, 2019. A Notice of Application was published in the Brattleboro Reformer on January 7, 2019. No comments were received during the application process.

The CAP was subject to a regulatory 30 day public notice via the DEC's Environmental Notice Bulletin Web Site <https://enb.vermont.gov>. The public notice period began on December 30, 2020 and ran through January 30, 2021. Additionally, BDCC notified all of the abutting landowners of the availability of the CAP and the ability to review and comment on January 4, 2021. No public comments were received during the public comment period. During a project status call on February 2, 2021, LFP representatives provided comments and design input to the cleanup plan including the final site configuration. These suggested changes were not implemented because the CAP had already been approved; however, the suggested changes could be implemented in the future.



E. Key Community Concerns

No community concerns have been expressed in connection with the approved cleanup plan. One comment was received from LFP staff indicating a preference for final design configuration after the cleanup is completed.

F. Continued Community Involvement

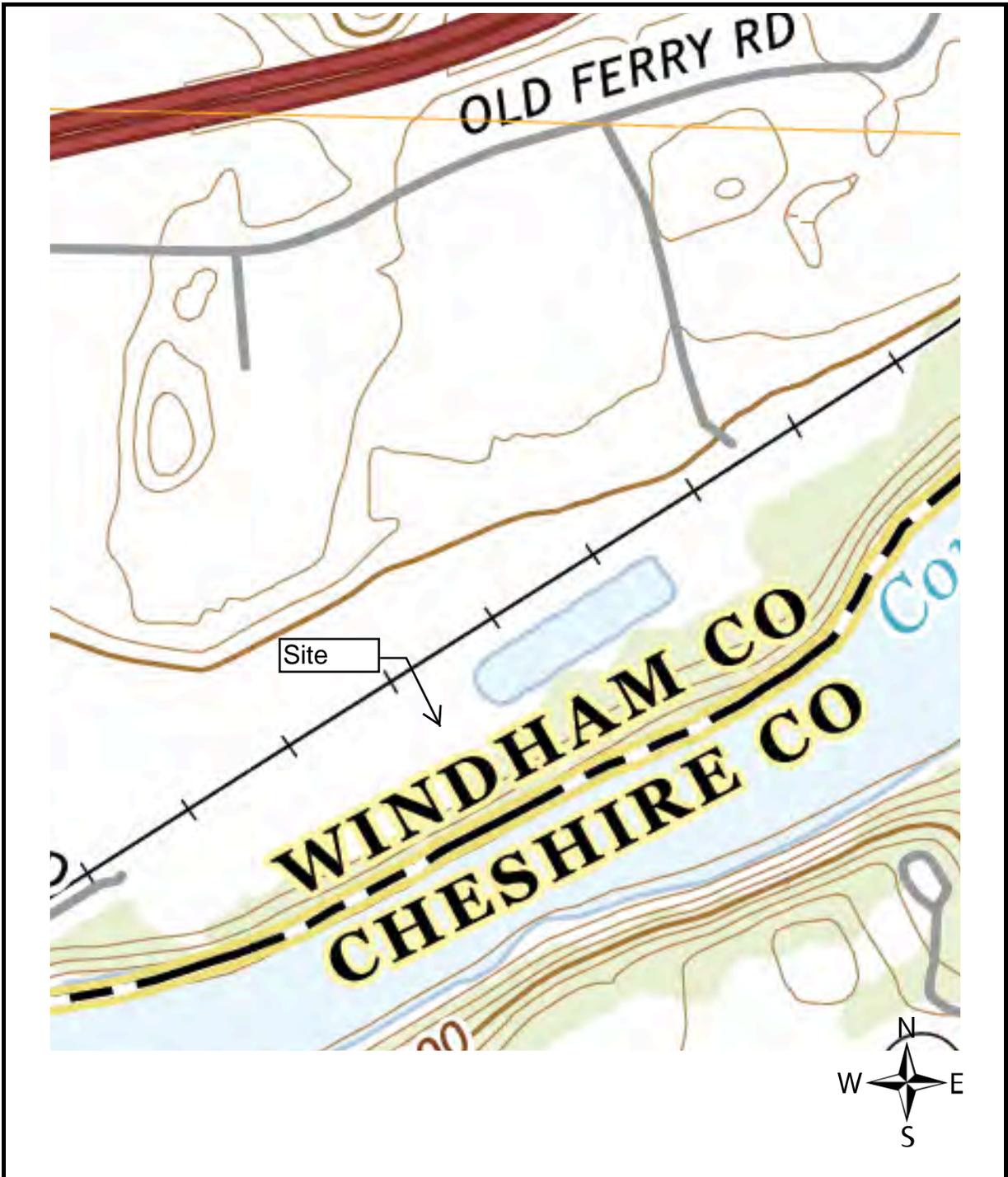
BDCC will provide additional public notice in advance of the cleanup including web site postings of relevant documentation and status updates, as they become available.



Community Relations Plan
Long Falls Paperboard, Brattleboro, VT

APPENDIX A

MAPS



Long Falls Paperboard
161 Wellington Road, Brattleboro, Vermont

2018 USGS Map



LE #: 18-122
Date: March 16, 2020
Source: USGS Store

ALTERNATIVE #3: GRADE ACCESS WINDOW INTO THE HOLDING BASIN AS SHOWN TO GAIN ACCESS AND REMOVE 13,040 CF OF SLUDGE. ASSUMED SLUDGE EXTENDS TO 295' CONTOUR AND AVERAGE OF 2' DEPTH. REMOVE MATERIALS FROM SITE AND REGRADE THE AREA TO BE UTILIZED BY THE PAPER MILL AS PROCESS STORAGE SPACE.

WASTEWATER TREATMENT LAGOON

ALTERNATIVE 3 PROPOSED GRADING

ASSUMED AREA OF SLUDGE
6520 SF X 2' = 13,040 CF (481 CY) OF SLUDGE
TO BE REMOVED FROM THE SITE

PROCESS WASTE PIPE

HOLDING BASIN

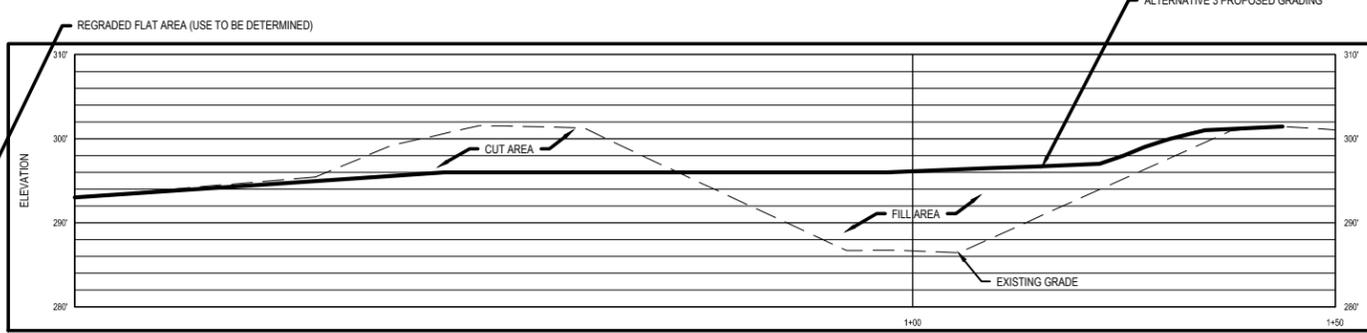
TEMPORARY STOCK PILE AREA

GATE

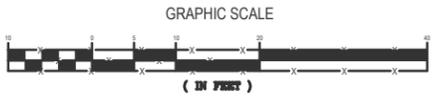
ALTERNATIVE 3 SITE PLAN
SCALE: 1"=10'

- 802' --- INDEX CONTOUR
- 802' --- MINOR CONTOUR
- ==== RAILROAD TRACKS
- ==== PAVED ROAD/DRIVE
- GRVEL ROAD/DRIVE
- WATER
- DRAIN
- UNDERGROUND ELECTRIC
- GAS
- HYDRANT
- MONITOR WELL

Holding Basin Lagoon Remedial Plan and Cross Section



ALTERNATIVE 3- SITE SECTION
H: 1"=10'
V: 1"=10'



| REV. | DATE | DESCRIPTION | BY |
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143 SOUTH BRENDELLE ROAD
WILKESVILLE, OHIO 44094
PHONE: (800) 862-5500
FAX: (800) 862-7598

GREEN MOUNTAIN ENGINEERING
CIVIL WATER WASTEWATER

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|---------------|-----------------------------|-----------------------|
| ALTERNATIVE 3 | LONG FALL PAPER MILL LAGOON | LE ENVIRONMENTAL |
| DESIGNED: AH | PILOT DATE: 9/21/20 | SCALE: 1" = 20' |
| DRAWN: JJB | DATE: SEP. 2020 | PROJECT NO. 25-005.18 |
| CHECKED: AH | DATE: SEP. 2020 | DRAWING NO. 3 |

FILES USE PROJECT FILE 25005.18 LE ENVIRONMENTAL\25005.18\25005.18\FALL PAPER MILL LAGOON\25005.18.DWG



APPENDIX B

PUBLIC MEETING INFORMATION AND MINUTES



FY19 EPA BROWNFIELDS CLEANUP APPLICATION

PUBLIC INFORMATIONAL MEETING

January 15, 2019

5:30 p.m.

Brattleboro Development Credit Corporation

76 Cotton Mill Hill

Brattleboro, Vermont 05301

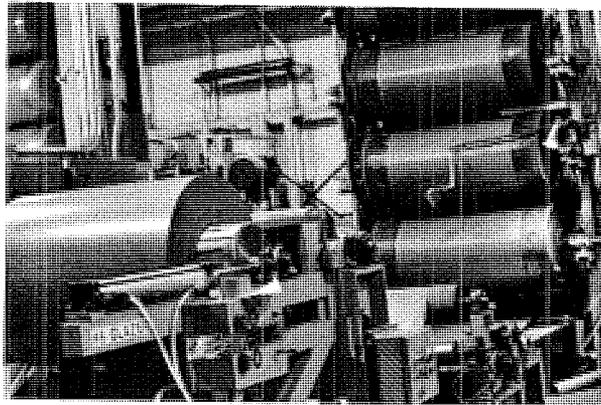
Brattleboro Development Credit Corporation (BDCC) will hold a public informational meeting on the date and time above regarding its draft FY'19 EPA Brownfields Cleanup Grant Application for funding to remediate the Long Falls Paperboard, LLC paper facility located at 161 Wellington Road, Brattleboro, Vermont.

All are welcome to attend the meeting. Copies of the draft grant application for the Long Falls Paperboard, LLC paper facility located at 161 Wellington Road will be available for review beginning January 8, 2019. Please visit BDCC at 76 Cotton Mill Hill, Brattleboro, Vermont 05301 during normal business hours or call Bobbi Kilburn at 802-257-7731 Ext. 220 to request a copy or to submit comments. A copy of the draft grant application will also be available at www.brattleborodevelopment.com.

76 Cotton Mill Hill, Brattleboro, Vermont is wheelchair accessible. To request an ASL interpreter, please call or email Bobbi Kilburn at 802-257-7731 Ext. 220, bkilburn@brattleborodevelopment.com by January 9, 2019.



Long Falls Paperboard EPA



BRATTLEBORO, VT – Long Falls Paperboard (LFP) and Brattleboro Development Credit Corporation (BDCC) announce the sale of the Brattleboro, VT paperboard plant, formerly owned and operated by Neenah Paper, Inc. (Neenah Paper). On December 31, 2018 LFP completed a complex financial transaction to acquire the business. This project has had support from numerous local, regional, and statewide partners ... [Read More](#)

Public Meeting Official Notice:

FY19 EPA BROWNFIELDS CLEANUP APPLICATION PUBLIC
INFORMATIONAL MEETING

January 15, 2019, 5:30 p.m. Brattleboro Development Credit
Corporation

76 Cotton Mill Hill

Brattleboro, Vermont 05301

More information can be found here.

Long Falls Paperboard LLC, Brattleboro, Vermont

Cleanup Grant Application – Hazardous Substances – January
2019

Analysis of Brownfields Cleanup Alternatives – Preliminary
Evaluation

Long Falls Paperboard, 161 Wellington Road, Brattleboro,
Vermont 05301

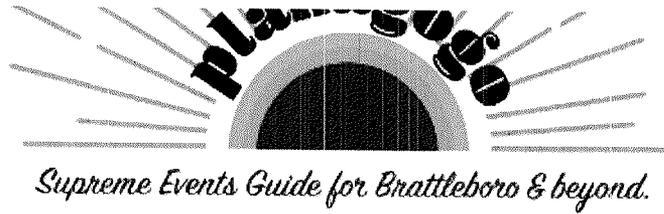
Vermont DEC Site Number 2010-4028

Prepared by Brattleboro Development Credit Corporation

BDCC Brownfields Cleanup draft ABCA



BRATTLEBORO EVENTS CALENDAR



Brattleboro Events Calendar

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Tuesday, Jan
15 

Brattleboro, VT 
20 mi

[+ Add Event](#)

Yoga & Chocolate for Planned Parenthood

118 Elliot | Brattleboro, VT 13.8 mi

5:00 pm

Knit Night

Windham Movement Apparel | Brattleboro, VT 13.9 mi

5:00 pm

Public Hearing on Long Falls EPA Grant

Brattleboro Development Credit Corporation | Brattleboro, VT 14.6 mi

5:30 pm

Old Time Session

McNeill's Brewery | Brattleboro, VT 13.9 mi

6:00 pm

Windham County Organizing Committee for Vermont Worker...

The Root Social Justice Center | Brattleboro, VT 13.5 mi

6:00 pm

SEVT Audubon Society

Brooks Memorial Library | Brattleboro, VT 13.8 mi

7:00 pm

Wednesday, Jan 16

Winter Group 2019

Mitchell Giddings Fine Arts | Brattleboro, VT 13.9 mi

11:00 am

The Nurse is In

Millstream Community Center | Hinsdale, NH 19.5 mi

11:30 am



- Cooking Class: Food as Medicine, for an anti-inflammatory ...** 5:30 pm
The River Garden | Brattleboro, VT 13.9 mi
- Families United** 6:00 pm
The Root Social Justice Center | Brattleboro, VT 13.5 mi
- Workshop: Savvy Social Security Planning for Women** 7:00 pm
Brooks Memorial Library | Brattleboro, VT 13.8 mi
- Savvy Social Security Planning for Women** 7:00 pm
Brooks Memorial Library | Brattleboro, VT 13.8 mi

Thursday, Jan 17

- NAEP Assessment Meeting of Assessment Coordinators an...** 10:00 am
Brooks Memorial Library | Brattleboro, VT 13.8 mi
- 11AM--Preschool Story Time with Susan Hessey** 11:00 am
Putney Public Library | Putney, VT 14.3 mi
- Winter Group 2019** 11:00 am
Mitchell Giddings Fine Arts | Brattleboro, VT 13.9 mi
- LEGO-palooza** 3:00 pm
Brooks Memorial Library | Brattleboro, VT 13.8 mi
- Brattleboro Co-op Producer of the Month: Bravo CBD** 4:00 pm
Brattleboro Food Co-Op | Brattleboro, VT 14.0 mi
- NAACP- Windham County Monthly Meeting** 5:30 pm
The Root Social Justice Center | Brattleboro, VT 13.5 mi
- OPEN MIC 6pm - 9pm** 6:00 pm
The Marina | Brattleboro, VT 13.5 mi
- Traditional Ashtanga Yoga as taught in India** 6:30 pm
Se-tu | West Brattleboro, VT 11.3 mi
- Baker Street Readers present "The Adventure of the Speckl...** 7:00 pm
Hooker-Dunham Theatre | Brattleboro, VT 13.9 mi
- Panel: Food as Artistic Expression** 7:00 pm
Brattleboro Museum & Art Center | Brattleboro, VT 14.0 mi
- LGBTQ AA MEETING** 8:00 pm
St. Michael's Episcopal Church | Brattleboro, VT 13.7 mi

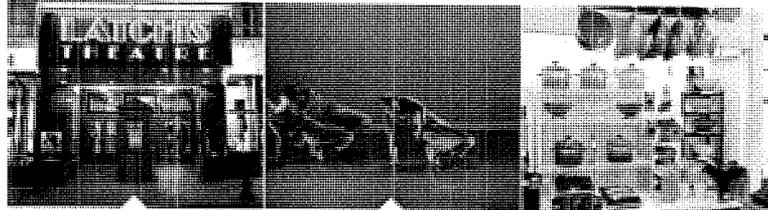


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PLACES OF INTEREST



Latchis Theatre

Brattleboro
School of Dance

Kitchen Sync

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Meeting Minutes

Brattleboro Development Credit Corporation

76 Cotton Mill Hill; Brattleboro, Vermont 05301

Public Informational Meeting: U.S. Environmental Protection Agency; Vermont EPA Brownfields Cleanup Grant

January 18, 2019

Meeting Date: January 15, 2019

Called to order at 5:30 PM.

Brattleboro Development Credit Corporation (BDCC) will be applying for a FY19 \$500,000 hazardous substances EPA Brownfields Cleanup Grant, grant due date is January 31, 2019. This funding request is for a single site cleanup of 161 Wellington Road; Brattleboro, Vermont, \$500,000 with a 20% cost share match, and to address cleanup of hazardous substances.

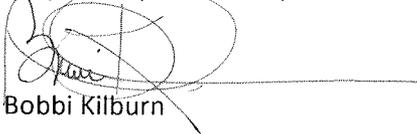
Awaiting the arrival of any members of the public, attendees, including Ms. Bobbi Kilburn, BDCCs Director of Finance & Grant Manager, Mr. Adam Grinold, BDCCs Executive Director, Ms. Jennifer Stromsten, BDCCs Director of Programs, and Mr. Alan Liptak, LE Environmental reviewed the draft grant application dated January 31, 2019, during which Mr. Liptak responded to questions, and accepted comments on the draft as currently written.

With no members of the public joining, Ms. Kilburn noted that inquiries for information had been received prior to the evening's public information meeting from Mr. Jeff Potter, Editor-in-Chief, The Commons, and Mr. Bob Audette, Brattleboro Reformer, each directed to <https://brattleborodevelopment.com/development-services/long-falls-paperboard-epa/> providing them information on the public information meeting, cleanup grant application, and BDCC Brownfields Cleanup draft ABCA. No further questions were received.

Additionally, the public information meeting notice was posted on the Downtown Brattleboro Alliance Events Calendar, at the Town of Brattleboro and Windham Regional Commission offices, with copies of the grant application and draft ABCA made available for interested parties at both office locations.

With no members of the public joining as of 6:00 PM, the public informational meeting was adjourned.

Respectfully submitted,



Bobbi Kilburn

Director of Finance

Brattleboro Development Credit Corporation