Community Relations Plan

Hardwick Yellow Barn Business Accelerator & Corporate Campus

281 Route 15 W, Hardwick

January 14, 2020

Overview

The purpose of the Community Relations Plan (CRP) is to describe the Town of Hardwick's strategy to address the needs and concerns of Hardwick residents potentially affected by the proposed mitigation of environmental contamination present at the site of the proposed Hardwick Yellow Barn Business Accelerator and Corporate Campus (aka "Yellow Barn"). The Town of Hardwick purchased the site on October 16, 2019. The municipality intends to redevelop the site as a multi-tenant business accelerator with a public-facing retail presence for food- and farm-related businesses. The project will consist of a new two-story multi-purpose accelerator with a footprint of approximately 25,000 sq. ft. and an adaptive reuse of the approximately 4,000 historic yellow barn.

This CRP outlines how the Town of Hardwick and redevelopment stakeholders have involved, and will continue to involve, affected residents and local organizations in the decision-making process regarding the environmental cleanup of the site. The success of the environmental cleanup of the Yellow Barn hinges on informed citizen involvement in each step of the cleanup process.

An automotive service business was present on the site for three decades. The site was purchased by the 1781 Group LLC in 2017 and sold to the Town of Hardwick in 2019. There have been no site improvements. Currently, the property is vacant and unused, although some new vehicles from auto dealership across the street have been occasionally parked on the eastern portion of the site over the past three years.

Environmental investigations have detected elevated levels of arsenic, cadmium, and lead in a septic effluent sample from the septic tank located in the western portion of the site. There are also possible polynuclear aromatic hydrocarbon (PAH) concentrations in the soil that may exceed Vermont State Levels (VSL). Both concerns stem from the site's three decades of use as an auto service business. A Corrective Action Plan has been developed to address both concerns. Redevelopment of the site, which is scheduled to commence in June of 2020, will include excavation of existing site soils and ground improvements to provide structural stability for the building's finished concrete floor slabs. Ground improvements will likely include compacted stone columns, to a depth of 4 feet (ft) below ground surface (bgs). Significant fill imported from off-site will likely be required on the western portion of the new building slab to bring the existing ground surface to grade. The site's septic system (tank and leach field piping) will be excavated and removed. During the removal, soil samples will be collected for analysis of arsenic, cadmium, and lead. Soil samples will also be collected from the east end of the storage shed.

Spokesperson and Information Repository

The spokesperson for this project is Shaun Fielder, Town Manager, of the Town of Hardwick. Mr. Fielder can be contacted at:

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Copies of all environmental assessment reports are located at the Town of Hardwick offices at the above address.

Site Description and History

Site Location

The 4.7-acre parcel is on a highly-travelled portion of Route 15, just at the gateway to Hardwick's downtown area. There are no deed restrictions on the use of the property.

The site is developed with three buildings:

1) The main building commonly known as the "Yellow Barn," an approximately 34-foot-wide by 116-foot-long structure with three levels and no basement. It is a wood framed and sided structure with a gambrel roof. The ground floor level has a cement floor.

2) An open storage shed is located to the south of the barn and is approximately 26-feet-wide by 115-feet-long. It is a wood framed and sided (3 sides) structure with a dirt floor and a shed roof pitched toward the south;

3)The barn and the shed are connected to each other on their west ends with an approximately 26-foot-long by 12-foot-wide wooden breezeway structure.

Site History

The barn was used for farming from the mid-19th century until the mid 1970s. While the main building was built in 1913, it encloses within its framing what appears to be a mid-19th century early barn. Castings for troughs and stalls are still present on the western side of the ground floor. A Determination of Eligibility, approved by the Department of Historic Preservation, found that the main barn is eligibility for the National Register of Historic Places because of it architecture, which is considered as a good representative example of an early 20th century ground stable barn. The structure is also architecturally significant because it documents its adaptation over time, as farms began to specialize.

In the mid 1970s, farming ceased and the property was adapted for use as an auto service shop, a use that contined into the previous decade. The ground floor of the barn was finished off with sheetrock walls and ceiling. The second and third floors of the barn, which appear to originally have been a hay loft, were later used to store auto parts.

The proposed renovations of the barn will preserve the distinctive exteriors of the east, north (street facing), and west elevations. The roof will be replaced with 24-gauge standing seam. The foundation will be replaced to stabilize the structure, and exterior siding will be preserved and renovated. Sheetrocked bays associated with the automotive service will be removed to expose the character-defining trusses and supports. The storage shed and breezeway, which were found to be in an extreme state of deterioration, will be demolished.

Summary of past assessment and remediation work and current status of the threat to public health and the environment

The Town of Hardwick had a Purchase Option Agreement with the 1781 Group since the fall of 2018. Because the town was pursuing a grant from the Vermont Community Development Program, the purchase of the property could not occur until an environmental review (which included a Phase I and Phase II assessment) was completed. Other activities associated with the environmental review included the VTrans highway access approval, delineation of flood hazard areas, determination of impacts to wetlands, agricultural soils, archeological resources, the possible abatement of lead, mold, and asbestos, a Determination of Eligiblity (for the National Register of Historic Places), and a Section 106 Review.

Potential environmental concerns at the site were first evaluated in 2017 and 2018. Ross Environmental Associates (REA) conducted a Phase I Environmental Site Assessment in 2017. The Phase I report identified one recognized environmental condition (REC) and two business environmental risks. The REC was the historic use of the site -- over 30 years as an auto garage with bodywork and equipment maintenance. The business environmental risks included accumulated solid waste (tires, car parts, empty containers) and use of hazardous substances and petroleum products on site. REA subsequently conducted a Phase II ESA to investigate the REC. Five test pits were dug between the barn and the storage shed, and the septic tank was located. REA concluded that no Vermont action levels or standards were exceeded for the septic tank effluent or soil samples collected during their assessment. The concentrations of arsenic, cadmium and lead detected in the septic tank sample did exceed the applicable VGES; however, the standards don't apply specifically to septic tank effluent. The absence of VOCs and PCBs in the septic tank sample suggested the former septic system was not a significant threat to the subsurface environment. Although the REA report recommended no further actions, the Vermont Department of Environmental Conservation (VTDEC) did not have an opportunity to review the Phase I ESA recommendations or proposed subsurface work as presented by REA prior to its implementation. Based on their review of the work post-completion, significant portions of the work as described in their report did not satisfy the VTDEC regulatory requirements in place at the time it was conducted.

In 2018, LE Environmental (LEE) completed a Phase I ESA that included an evaluation of the prior REA Phase I/II ESA information. LEE identified several RECs including: a) possible subsurface contamination in the leach field area due to discharges from the septic tank that accepted, in addition to sanitary wastes, effluent from a former shop sink in the Yellow Barn; b) possible subsurface contamination from petroleum, solvents, and polycyclic aromatic hydrocarbons (PAHs) due to historic use (auto repair/maintenance) and nearby off-site uses (south-abutting former rail bed); and c) potential soil gas contamination on the site due to its historic use for auto repairs/maintenance and from the northeasterly-adjoining Lamoille Valley Ford Site. LEE's Phase I ESA recommended the completion of a

supplemental Phase II ESA and a Tier II Vapor Encroachment Study (VES) to determine if contamination was present.

By 2019, the Phase II needed to be updated because more than one year had passed. Stantec reviewed both the REA and LEE ESAs and addressed some data gaps with additional borings, soil samples and soil vapor samples. Although Stantec's Phase II subsurface investigation of the leach field area did not indicate impacts to soil or groundwater above Vermont standards, previous sampling data indicates that heavy metal contamination may be present, and additional investigation is warranted. This issue is addressed in this Corrective Action Plan. Similarly, although the detected PAH concentrations in soil samples did not exceed Vermont Screening Levels, the elevated laboratory reporting limits for these samples were above associated Vermont Screening Level, and so represent a data gap. Therefore, this issue is also being addressed in the Corrective Action Plan.

Summary of Proposed Remedial Actions

The Corrective Action Plan proposes to excavate the site's septic system (tank and leach field piping) and dispose of it off-site. During the removal, soil samples will be collected from effluent discharge points for analysis of arsenic, cadmium, and lead to evaluate soil quality in the vicinity of the septic system. Soil samples will also be collected from the east end of the storage shed. These samples will be analyzed for PAHs using EPA Method 8270 SIM to obtain laboratory reporting limits below Vermont standards.

Based on the findings of the soil sample analysis, two remedial options are possible:

Option 1 – None of the sample results exceed applicable Vermont soil standards, so no further action is required regarding site remediation; and

Option 2 – Sample results do exceed applicable Vermont soil standards, so implementation of a remedial strategy would entail:

- erosion and sediment control measures including a stabilized construction entrance;
- bermed and poly-lined material stockpiles to contain excavated and graded soils prior to sampling to evaluate for off-site disposal at a local, VTDEC-permitted, non-hazardous waste facility;
- ambient air monitoring for volatile organic compounds and particulates by a qualified environmental professional; and
- Installation of an engineered barrier overlying contaminated soils to remain in place on the site. Recording an environmental easement for the site with the local municipality.

Community Background

The site is located in Town of Hardwick, Caledonia County, Vermont. According to the US Census Bureau's 2010 Demographic Profile, the town had a population of 3,010. The project is located within a Census Designated Place (Hardwick Village), which had a population of 1,345. The town and village have one municipal government, governed by a five-member selectboard.

The entire parcel is in Hardwick's "Highway Mixed Use district," which allows for agricultural and forest processing, as well as earth extraction, light industry, and sawmills, retail, and hospitality. The objective of this zoning district is to "allow automobile-oriented businesses and other compatible uses along

major travel corridors contiguous to the historic village centers, while maintaining safe and efficient traffic flow."

The Town of Hardwick serves multiple municipalities because is considered an “emerging regional urban center” in the Regional Plan for the Northeast Kingdom. State highways 14 and 15 converge in the center of the downtown area, and the southern terminus of State Route 16 intersects with Route 15 in the eastern part of Town. Latest Census analysis, based on 2017 W-2s, shows that while 362 Hardwick residents have covered employment in town, the town draws an additional 908 covered employees from outlying towns, including Montpelier, Morristown, Hyde Park, Glover, St. Johnsbury, Greensboro, Newport, Danville, Barton, Barre, and beyond.

Chronology of Community Involvement

In accordance with Vermont Department of Environmental Conservation, neighboring properties were given a notice of the Corrective Action Plan. A public notice was issued by the Vermont Department of Environmental Conservation, and the 30-day public comment period expired on November 7.

Other public notices establishing public comment periods were issued in connection with the Town’s intention to redevelopment the site, including public comment period for a State Wetlands permit, and a Combined Finding of No Significant Impact and Request for Release of Funds.

Summary of Public Comment Hearings/Periods

No comments were received during any of the above-mentioned public comment periods.

Key Community Concerns

To date, no member of the community has voiced concerns about the project.

Continued Community Involvement

The Town of Hardwick maintains a project web site http://nvda.net/yellow_barn/. The web site contains links to the Corrective Action Plan. Additional project information will be disseminated through the web site, Front Porch Forum, and a media list serve maintained by the Northeastern Vermont Development Association, the regional planning commission serving the Town of Hardwick.

If Option 2 of the Corrective Plan were necessary, the neighboring parcel owners would receive an additional notification regarding the scope of work. Following project completion, the Town would make available and a summary Corrective Action Construction Completion report. A qualified consultant would annually inspect the engineering/institutional controls to document their continued performance and effectiveness over time.