

November 19, 2012

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

RE: EPA Brownfields Cleanup Grant FY2013

Dear Mr. West:

The City of Paterson is submitting its complete proposal package for a \$200,000 cleanup grant to remediate the Paterson Armory property located in the City of Paterson. As indicated in the Proposal Guidelines, this letter will serve as our Transmittal Letter.

- a. **Applicant Identification:** City of Paterson, 155 Market Street, Paterson, NJ 07505
- b. **Applicant DUNS Number:** 067484063
- c. **Funding Requested:**
 - i) Grant Type: Cleanup
 - ii) Federal Funds Requested: \$200,000, and we are requesting a cost-share waiver
 - iii) Contamination: Hazardous Substances
- d. **Location:** Paterson, New Jersey
- e. **Property Name and Complete Site Address, including Zip Code:**
Paterson Armory, 461-473 Market Street, Paterson, NJ 07501
- f. **Contacts:**
 - i) Project Director: Lanisha D. Makle, Director, Department of Community Development, 125 Ellison Street, 2nd Floor, Paterson, NJ 07505
Telephone: (973) 321-1212, Fax: (973) 321-1202, Email: lmakle@patersonnj.gov
 - ii) Chief Executive/Highest Ranking Elected Official: Jeffery Jones, Mayor, City Hall, 155 Market Street, Paterson, NJ 07505, Telephone: (973) 321-1600, Fax: (973) 321-1555, Email: mayorjones@patersonnj.gov

- g. **Date Submitted:** November 19, 2012
- h. **Project Period:** Three Years
- i. **Population:** 146,199 (American Community Survey, 2012)
- j. **Special Considerations Checklist:** Attached

Thank you for your time and consideration of our grant request. Should you have any questions, please feel free to contact me at (973) 321-1212.

Sincerely,

Lanisha D. Makle
Director

cc: Lya Theodoratos, EPA Region 2

RANKING CRITERIA FOR CLEANUP GRANTS

1. Community Need

The City of Paterson is the oldest industrial and the first planned industrial city in the United States with a foot print that spans 8.4 square miles. According to the 2012 Census, the City of Paterson's population totals 146,199 persons. The economic and employment characteristics of the City of Paterson differ from its surrounding communities. The City's unemployment rate, based on the 2010 Census, is 12.4% in comparison with 10.8% for the State of New Jersey. The per capita income for the City of Paterson is \$15,084 with 23.7% of the City's population, ages 18 to 64, living below the poverty line.

According to the State of New Jersey Department of Environmental Protection, the City of Paterson contains over 73 known sites which are contaminated in some manner. The site that the City has identified is a large abandoned site, which remains unproductive and has reduced the value of properties adjacent to it. In addition, it has been the experience of the City that the adjacent property owners have demonstrated a lack of consistency in re-investing in their properties due to the blight of the adjacent contaminated brownfield sites. Families and business who can afford to move from an area adjacent to a brownfield site relocate, leaving behind families who fall below the poverty line. Since 1990, the City of Paterson has experienced a serious decline in its ratables. As a result, the number of vacant and abandoned properties has increased and surrounding property values have declined.

As one of the State of New Jersey's oldest industrial cities, the City of Paterson is one of a specific set of communities that lags behind its peers in economic health and well-being. The City of Paterson has an economic history dominated by manufacturing. In 1970, the majority of Paterson's residents were employed in manufacturing, but with the deindustrialization of our City, there has been a severe decline in manufacturing employment, which has left the City struggling to find its economic industry-sector niche. Between 1990 and 2000, the City of Paterson lost nearly 16% of its jobs. Today, the City of Paterson has a 12.4% unemployment rate, which is the highest in the County of Passaic and is higher than the State of New Jersey's unemployment rate of 10.8%.

For all of its economic challenges, the City of Paterson possesses numerous economic, physical and cultural attributes that, if fully leveraged, could be converted into vital competitive assets for the City's revitalization. The City of Paterson is a historic city with a total of sixteen (16) properties listed on the National Register of Historic Places. In addition, there are a total of twenty (20) properties that have been listed on the city of Paterson's Historic Sites and Landmark Buildings List. The City of Paterson is home to the fastest growing community college in the State of New Jersey, Passaic County Community College. In addition, the City of Paterson is home to St. Joseph's Regional Medical Center, which is the City's largest employer.

The time is ripe to seize upon the assets that the City of Paterson possesses to return Paterson to its former status as a place of innovation, an economic driver for the region and a place with high quality communities where our residents have choices and opportunities available for them to thrive not just survive.

Demographic Information

	Target Community/Census Tract	County/City	State	National
Population:	146,199	501,226	8,791,894	308,745,538 ¹
Unemployment:	12.4%	11.1%	10.8%	8.2% ²
Poverty Rate:	23.8%	12.5%	7.8%	15.1% ³
Percent Minority:	65.3%	37.3%	31.4%	26.7% ¹
Median Household Income:	\$15,084	\$25,244	\$35,555	\$49,445 ³
¹ Data is from the 2010 U.S. Census data and is available at http://www.census.gov/ . ² Data is from the Bureau of Labor Statistics and is available at www.bls.gov ³ Data is from the 2010 American Community Survey and is available at http://www.census.gov/newsroom/releases/archives/income_wealth/cb11-157.html				

For resources to gather demographic information, please go the FAQs at
http://www.epa.gov/brownfields/proposal_guides/FY13_FAQs.pdf.

2. Project Description and Feasibility of Success

a. Project Description

The City of Paterson wants to rehabilitate a historical asset, the Paterson Armory, and convert it into a new facility to provide the community with a place to gather and play. The City has prepared a Redevelopment Plan to designate the area surrounding the Armory as an “area in need of redevelopment” therefore allowing strategic development and revitalization of the site. The site will be converted into a Community Center providing a range of services and opportunities for athletic activities, as well as, educational and training opportunities for the local community.

The site will also be a stop on the list of “Heritage Tourism” to attract residents, businesses and tourists to the City. Heritage Tourism as described by the National Trust for Historic Preservation in the United States defines it as “travelling to experience the places and activities that authentically represent the stories and people of the past.

The site was constructed in 1895 to service the New Jersey State National Guard. It was abandoned in 1990 and has been empty for over 22 years. It occupies an entire city block with a building of approximately 43,000 sq ft. It is half a mile east of the downtown train station and across the street from Eastside High School and the New Roberto Clemente Elementary School. The building was used for the assembly of the Guard staff for group training and exercises as well as for athletic activities including basketball.

The architectural, structural and engineering assessment performed in 2008 identified some environmental hazards. There was a limited hazardous materials assessment performed on building materials for the purpose of identifying the presence and/or absence of asbestos

containing materials, lead based paint and polychlorinated biphenyls / mercury containing electrical items that could affect the redevelopment of the property. Additional assessment and remediation of the contaminants will be required. In addition, an AAI Phase I Environmental Site Assessment (ESA) was completed for the Paterson Armory property in June 2008 and a Phase II Investigation was completed in March 2009. Both the Phase I and Phase II were funded with Passaic County, New Jersey USEPA Assessment Grant Funds.

Connectivity and mobility are crucial to the success of attracting people to the Armory. The city envisions that this sports/community complex will attract many people and wants these visitors to have a positive experience while walking throughout the downtown commercial district.

The city anticipates that the rehabilitation of the site will act as a catalyst for changes in the community including: the improvement of existing structures by current land owners (i.e., new mix uses); the establishment of new retail which may also stimulate the housing market; increased tax ratable; and a reduction in crime. Additionally, the community center will provide a new facility for organized sporting events and educational forums for the over 50 schools located within the city.

The price point for renting or utilizing this facility will be lower than any other similar facility in the area thus providing the private clubs of the surrounding neighborhoods a place to practice and hold tournaments at a more affordable price.

In addition, the development of the site may generate close to 300 construction jobs and 100 full-time jobs at the site.

b. Budget

Budget Categories	Project Tasks				
(programmatic costs only)	[Task 1] Paterson Armory	[Task 2]	[Task 3]	[Task 4]	Total
Personnel	\$0				\$0
Fringe Benefits	\$0				\$0
Travel ¹	\$0				\$0
Equipment ²	\$0				\$0
Supplies	\$0				\$0
Contractual ³	\$200,000				\$200,000
Other (specify)					
Total	\$200,000				\$200,000
Cost Share ⁴	\$0				\$0

- ¹ Travel to brownfields-related training conferences is an acceptable use of these grant funds.
- ² EPA defines equipment as items that cost \$5,000 or more with a useful life of more than one year. Items costing less than \$5,000 are considered supplies.
- ³ Applicants must comply with the procurement procedures contained in 40 CFR 31.36, or for non-profits, with 40 CFR 30.40 through 30.48.
- ⁴ Applicants must include the cost share in the budget even if applying for a cost share waiver. If the applicant is successful and the cost share waiver is approved, it will be removed in preaward negotiations.

c. Leveraging

The City of Paterson has submitted a cost share waiver for consideration by the United States Environmental Protection Agency.

The \$200,000 grant will begin to assist to the City in its ability to finalize the asbestos and interior remediation activities while efforts for overall site wide planning and redevelopment efforts continue to advance the overall redevelopment area.

Through public and private partnership commitments, the City will continue to strengthen existing relationships and identify new funding partners to advance the need for financing as all city wide development is brought to successful completion.

A significant investment of federal and state public funding sources provided to date within the City of Paterson include the following:

- USEPA Funding (Brownfields)
- NJDEP Hazardous Discharge Site Remediation Funding (HDSRF) for Brownfields
- NJ Department of Transportation / NJ Department of Community Affairs Funding (Transportation and Planning)
- NJ Economic Development Authority Funding (Economic Development)
- Green Acres (Open Space)
- Others, Private Sector

d. Programmatic Capability and Past Performance

The Department of Community Development is responsible for managing and administering the City of Paterson's HUD Entitlement funds for its Community Development Block Grant (CDBG); Home Investment Partnership Program (HOME); Emergency Shelter Grant (ESG); and National Stabilization Program (NSP). In this role, the Department of Community Development prepares and submits to the United States Department of Housing and Urban Development the City of Paterson's Five (5) Year Consolidated Plan, as well as its Annual Action Plans. The Department is also responsible for establishing the sub-recipient award process for its entitlement program dollars. With the sub-recipient award process, the Department develops a calendar of activities, develops an annual request for proposal for each funding source and manages the community review process. In addition, the Department is responsible for the fiscal and programmatic monitoring process for CDBG, HOME and ESG

sub-recipient grantees.

Further, the Department and its Director acts as the liaison between the City of Paterson and the Newark Field Office of the United States Department of Housing and Urban Development. The department's director, Ms. Lanisha Makle, was appointed as the Acting Director by Mayor Jeffery Jones on September 7, 2010. She was confirmed by the Paterson City Council as the Director of the Department of Community Development on December 21, 2010. Prior to her appointment, Ms. Makle served as Director of the Passaic County Workforce Investment Board (WIB), a position which she was appointed to in September 2006. Prior to her appointment as the Director, Ms. Makle served as the Planning Aide for the Acting WIB Director, Neil Muller, for a six month period. During her tenure as planning aide, Ms. Makle spent a long amount of her time learning the workforce development system in Passaic County and its partners. Since her appointment, Ms. Makle has made the board make-up one of her top priorities, along with educating the local community about the WIB and its operations. Ms. Makle was born in East Orange, NJ. She graduated high school from Blair Academy. She continued her postsecondary education at Smith College in Northampton, MA. She has a master's degree in Administrative Science from Farleigh Dickinson University. Ms. Makle is currently enrolled in the Masters of Public Administration Program at Kean University.

The City of Paterson received an adverse audit from the United States Department of Housing and Urban Development on December 18, 2009. In the audit, the City of Paterson was cited for utilizing funds for ineligible costs, as well as for non-receipted program income generated as a consequence of the investment of HUD funds. As a result, the United States Department of Housing and Urban Development has instituted remedial action, which has resulted in the City of Paterson having to repay \$2,197,067.28 to satisfactorily address the recommendations contained in the audit report.

The City of Paterson received a grant from the United States Environmental Protection Agency in 1998. The grant was for the Brownfield Economic Redevelopment Initiative Brownfields Assessment Demonstration Pilot. In its grant application, the City of Paterson proposed to implement the following goals and objectives for its Brownfields Program:

- Identify Project Team, including, but not limited to the following disciplines: environmental research, public real estate law with expertise in foreclosure, tax incentives and tax liens, real estate financing, and a community advisory committee which will ensure public outreach/community consensus building and risk communication.
- Development of a draft guidance document which includes the contaminated sites response policy model, redevelopment plans and a financial program model.
- Apply the draft contaminated sites response policy model to six Paterson brownfields sites to test the model and its efficiency. Preliminary assessments, site investigations and remedial investigations will be performed as appropriate.
- Develop an aggressive outreach/educational program for the local community in conjunction with the Community Advisory Committee which will communicate a

clear description of local environmental constraints and incorporate community needs, ideas and assistance in the implementation of the pilot and the redevelopment strategies which are developed.

The final report for the grant was submitted on June 30, 2009. In the final report, the following description of activities and accomplishments were outlined:

As part of the Workplan a Brownfields Strategic Plan was developed. The purpose of the Brownfields Strategic Plan was to establish a policy for implementing brownfields redevelopment in accordance with the goals and objectives of the City's Master Plan and redevelopment plans, and to develop an administrative mechanism for establishing financial budgets and determining what portions can be funded by external resources. The Brownfields Strategic Plan served as a policy document for the City, providing the framework for the redevelopment of Brownfields sites. In addition, the Brownfields Strategic Plan serves as an important element when the City applies for State and Federal funds for brownfields assessment and cleanup, as participating agencies require municipalities to have a comprehensive plan and integrated approach for Brownfields redevelopment before allocating their financial resources.

The Brownfields Strategic Plan consisted of the following: The creation of a Brownfields inventory to identify the property location, ownership status, current use, block and lot numbers, property size, site structures present, qualitative condition of property and site structures, environmental assessment/clean-up status, zoning and special planning considerations for the site, etc. A map was developed to show site zoning and whether they are located in the City's redevelopment areas, historic districts or Urban Enterprise Zone. In addition, the database included a picture of each site. The Strategic Plan also includes an Action Plan with a variety of important factors for the redevelopment of Brownfields in the City. This section contains community education and outreach, site assessment and investigation activities, financial resources, remediation efforts, and planning and policy documentation.

An important goal of this program was the desire for public participation in the redevelopment of the Brownfields. This was accomplished by creating an advisory committee. The name of this group is the Paterson Environmental Revitalization Committee (PERC). This group consists of members with experience in the environmental field, real estate business, legal, banking, housing development, and economic development and community organizations such as Community Development Corporations (CDCs). The mission of the PERC Committee is to provide mechanisms to educate and effectively relay information to the community, allowing the community to participate in the remediation/redevelopment process in an informed manner; and, to advise the Mayor and Council, and other agencies, as necessary, on pertinent redevelopment issues affecting our neighborhoods. The PERC Committee has developed questionnaires for developers regarding Brownfields redevelopment. They have organized outreach meetings to educate the community on how to be involved in the Brownfields redevelopment process. They also have been successful in identifying key members for the committee which is essential in order to

keep their neighborhood in the loop.

Thanks to this pilot program, the PERC Committee was created eight years ago and has been meeting on a monthly basis. The Committee has accomplished important tasks such as the award of a Brownfields Development Area program. The City of Paterson's Brownfields Development Area (BDA) designation, established in 2005 is one of the premier projects managed in the NJDEP Office of Brownfields Reuse (OBR). The BDA boundaries incorporate the National Historic Park, NJ State Park and the City's Great Falls Historic District and overall vision of the redevelopment of the Great Falls area.

To date, the BDA incorporates over 20 subject properties throughout the Great Falls Historic District, which are currently under several phases of investigation and remediation. These efforts are critical in the successful planning and development of the National Historic Park designation project. This year the Great Falls Historic District received the designation of a state park.

Nearly \$3,000,000 of federal and state (public) funding has been provided to the City of Paterson to support the assessment, feasibility, historic preservation and environmental efforts to make this vision a reality.

Additionally, public, private and community stakeholder efforts have been a critical component to the overall planning and development efforts thus far and these groups continue to work diligently in assuring the overall success of the BDA and National Historic Parks project.

The performance of site assessments was an important component of this pilot Workplan. In 2005, the members of PERC, in conjunction with the City, selected three properties from the Brownfields inventory for Preliminary Assessment (PA) studies and a Site Investigation (SI). The selected properties were 52-62 Ryle Avenue, 28-42 Ryle Avenue, and 79 Montgomery Street.

The City of Paterson was in compliance with the reporting for its Brownfield Economic Redevelopment Initiative Brownfields Assessment Demonstration Pilot.

3. Community Engagement and Partnerships

The City of Paterson is committed toward ensuring the future and long-term involvement of our neighborhoods in the redevelopment of local brownfields sites. The City of Paterson will utilize the Paterson Environmental Revitalization Committee as a vehicle to disseminate information about this grant and its activities. In addition, the Department of Community Development will incorporate the communication of its grant activities with its public outreach efforts for its HUD Annual Action Plan process, which consists of two city-wide public meetings. The goal of the meetings is to solicit from the community its priorities for the upcoming program year and incorporate those priorities into the planning and spending of

the City's HUD entitlement dollars. Based on the City's Limited English Proficiency Plan (LEP), the Department of Community Development is required to make documents available to the public in English, as well as Spanish. Due to the number of the staff members of the Department of Community Development who are bi-lingual, we will utilize these staff members for translation purposes. If needed, the City of Paterson can request assistance from Passaic County Community College and William Paterson University for translation and/or interpretations.

The Paterson Environmental Revitalization Committee was formed in 2004 as part of the United States Environmental Protection Agency's funded Brownfields Demonstration Pilot Program. Paterson's Environmental Revitalization Committee consists of a broad-based group of government, attorneys, realtors, developers, community representatives, engineering professionals, bankers and academics. The mission of Paterson Environmental Revitalization Committee is to provide mechanisms to educate and effectively relay information to the community, allowing the community to participate in the remediation/redevelopment process in an informed manner; and to advise the Mayor and City Council, and other agencies, as necessary, on pertinent redevelopment issues affecting neighborhoods within the City. The Paterson Environmental Committee is slated to meet six times in 2012.

Lastly, the Department of Community Development will provide updates about the Brownfields Cleanup Program to the community via its newsletter, City Lights, and its Facebook page. The newsletter is also posted on the City of Paterson's website (www.patersonnj.gov) for viewing by the residents. Information about the public meetings is also posted on Channel 77 to ensure active local community participation.

4. Project Benefits

The City of Paterson is interested in rehabilitating a historical asset and converting it into a new facility to provide the community with a place to gather and play. The city has prepared a Redevelopment Plan to designate the area around the Armory as an "area in need of redevelopment" therefore allowing strategic development and revitalization of the site. The site will be converted into a Community Center providing a range of services and opportunities for athletic activities, as well as, educational and training opportunities for the local community.

The city anticipates that the rehabilitation of the site will act as a catalyst for changes in the community including: the improvement of existing structures by current land owners (i.e., new mix uses); the establishment of new retail which may also stimulate the housing market; increased tax ratable; and a reduction in crime. Additionally, the community center will provide a new facility for organized sporting events and educational forums for the over 50 schools located within the city.

The price point for renting or utilizing this facility will be lower than any other similar facility in the area thus providing the private clubs of the surrounding neighborhoods a place to practice and hold tournaments at a more affordable price.

Connectivity and mobility are crucial to the success of attracting people to the Armory. The city envisions that this sports/community complex will attract many people and wants these visitors to have a positive experience while walking throughout the downtown commercial district.

In addition, the development of the site may generate close to 300 construction jobs and 100 full-time jobs at the site.

THRESHOLD CRITERIA FOR CLEANUP GRANTS

1. Applicant Eligibility

a. Eligible Entity

The City of Paterson is a municipal (local) government entity which makes it an eligible entity to apply for a USEPA Brownfields Cleanup Grant.

b. Site Ownership

The City of Paterson owns the Paterson Armory

2. Letter from the State or Tribal Environmental Authority

A letter from the State of New Jersey Department of Environmental Protection

3. Site Eligibility and Property Ownership Eligibility

a. Basic Site Information

(a) Site Name: Paterson Armory

(b) Site Address: 461-473 Market Street, Paterson, New Jersey

(c) Site Ownership: The City of Paterson is the current owner of the site

b. Status and History of Contamination at the Site

(a) The Paterson Armory site is contaminated with hazardous substances.

(b) the operational history and current use(s) of the site (To Be Inserted)

(c) environmental concerns include asbestos and lead based paint

(d) how the site became contaminated, and to the extent possible, describe the nature and extent of the contamination site (To Be Inserted)

c. Sites Ineligible for Funding

(a) This site is not listed or proposed for listing on the National Priorities List.

(b) This site 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.

(c) This site is not subject to the jurisdiction, custody, or control of the United States government.

d. Sites Requiring a Property Specific Determination

This site does not fall into any of the categories that require a property-specific determination in order to be eligible for funding.

e. Environmental Assessment Required for Cleanup Proposals

A Phase II Site Assessment for this property was completed in March 2009.

f. CERCLA §107 Liability

The City of Paterson did not contribute to the contamination at the site. The City of Paterson did not own or operate the site when hazardous materials were deposited there, or arranged for the treatment or disposal of hazardous substances for transport to disposal or treatment facilities at the site. The City of Paterson believes it is eligible for the CERCLA liability protection as a local government entity that *acquired the property involuntarily through foreclosure*.

g. Enforcement or Other Actions

There are no known ongoing or anticipated environmental enforcement or other actions related to this site. There are no known inquiries or orders from federal, state or local government entities that the City of Paterson is aware of regarding the responsibility of any party for the contamination or hazardous substances at the site.

h. Information on Liability and Defenses/Protection

i) Information on the Property Acquisition

The City of Paterson acquired the site through foreclosure in 2004 from Arthur and Dinorah Bernstein. Ownership is fee simple. The City of Paterson does not have any familial, contractual, corporate, or financial relationships or affiliations with the prior owners or operators of the property.

ii) Timing and/or Contribution Toward Hazardous Substances Disposal

The City of Paterson has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

iii) Pre-Purchase Inquiry
(To Be Inserted)

iv) Post-Acquisition Uses

This does not apply. The City of Paterson acquired the property in 2004, but it has been abandoned since 1990.

v). Continuing Obligations
(To Be Inserted)

The City of Paterson is committed to the following as applicable:

- Complying with all land-use restrictions and institutional controls
- Assisting and cooperating with those performing the cleanup and providing 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.
- i. Petroleum Sites (Disregard this item if you do not have a petroleum site)
This does not apply.

4. Cleanup Authority and Oversight Structure

- a. Cleanup Oversight
The interior remediation of the Armory, which will include asbestos abatement and stabilization and intact removal of lead based paint, will be managed by the City of Paterson, in conjunction with a qualified and licensed environmental consultant with appropriately trained and experienced AHERA building inspectors and NJDHSS lead inspectors/risk assessors. The asbestos abatement plans and specifications will have to be designed in accordance with all applicable federal, state and local laws. Once the abatement contractor is selected, a certified New Jersey Asbestos Safety Technician (AST) will monitor the abatement.
- b. Access to Adjacent Properties
Access to neighboring properties will not be needed since the Armory building comprises the entire city block.

5. Cost Share

The City of Paterson has requested a waiver of the 20% cost share requirement. The request is included in the attachments.

6. Community Notification

The City of Paterson published a newspaper notice in The Herald News and The Record on October 19, 2012 notifying the public of our intent to apply for the EPA Brownfields Cleanup Grant, of the availability of the draft Analysis of Brownfield Cleanup Alternatives (ABCA), and of the opportunity to comment on the applications and the ABCA. This notification was posted more than two weeks prior to the grant submittal due date of November 19, 2012. The notification also informed the public that the City of Paterson Department of Community Development would be holding a public hearing on November 5, 2012 where the community was welcome to submit comments. The draft ABCA, documentation of community notification and the notes summarizing the public hearing are included as attachments to this proposal.

CITY OF PATERSON

DEPARTMENT OF COMMUNITY
DEVELOPMENT



Lanisha D. Makle, Director

Jeffery Jones
Mayor

Re: Hardship Waiver Request

To Whom It May Concern:

As stated in the Brownsfield Law, clean-up grant recipients are required to share 20% of the total cost, however, the City of Paterson is requesting a waiver for the cost share requirement. The City has executed a Transitional Aid Memorandum with the State of New Jersey Department of Community Affairs. Under the MOU, the City has received \$28 million to assist in closing its budget deficit. Per the conditions of the MOU, the City is not able to take on any programs or grants that require cost-sharing. The MOU mandates that the City submit weekly reports on closing its structural deficit and provide a transition plan to eliminate reliance on transitional aid and restrict its hiring and transfer of personnel.

However, the City of Paterson has entered into a new chapter in its history. The City has been granted the pleasure of becoming home to the 397th National Park in the United States, the Great Falls National Historic Park. As a result of months of negotiations, the City of Paterson, the Paterson Municipal Utilities Authority and the National Park Service of the United States Department of the Interior were able to finalize a Memorandum of Understanding that would create a manageable unit for the Great Falls National Historic Park. Under the MOU, the City of Paterson agreed to see outside sources of funding, due to its budget constraints, for monies to remediate the sites that would become part of the National Park.

The City of Paterson is the third largest city in the State of New Jersey with a population of 146,199 individuals. The City is located in the County of Passaic, in the northern part of the State. The City is home to one of the nation's largest and most spectacular waterfalls. The Great Falls was harnessed to power new industries and played a key role in shaping the Industrial Revolution and building the US economy. Today, Paterson is considered one of New Jersey's five older industrial cities and has been characterized by declining economic growth. The City is home to 146,199 persons according to the 2010 US Census. The per capita income for the City of Paterson is \$15,084. For the population of individuals 16 or older, there is a 12.4% unemployment rate, which is higher than the State of New Jersey's unemployment rate of 10.8%. Additionally, there are 21,893 individuals between the ages of 18-64 who are living below the poverty line, which accounts for 23.7% of the City of Paterson's population.

Based on the economic and social factors presented, the City of Paterson respectfully requests a cost share waiver for its 2013 Brownsfield Clean-up Grant submission for the following three sites: The Armory, Columbia Textile Mills and Addy Mill.

DRAFT
Analysis of Brownfield Cleanup Alternatives (ABCA)
For Paterson Armory

Introduction and Background

The City of Paterson is applying for a \$200,000 Cleanup Grant from the US Environmental Protection Agency for the purpose of remediating asbestos contamination at the Paterson Armory site located at 461-473 Main Street, Block 4109, Lot 1, Paterson, New Jersey. The City of Paterson is requesting a waiver of the 20% cost share requirement. A copy of the request is included in the proposal submission. This Analysis of Brownfield Cleanup Alternatives is provided to outline three possible cleanup alternatives for the site.

The site was constructed in 1895 to service the New Jersey State National Guard. It was abandoned in 1990 and has been empty for over 22 years. It occupies an entire city block with a building of approximately 43,000 sq ft. It is half a mile east of the downtown train station and across the street from Eastside High School and the New Roberto Clemente Elementary School. The building was used for the assembly of the Guard staff for group training and exercises as well as for athletic activities including basketball.

The architectural, structural and engineering assessment performed in 2008 identified some environmental hazards. There was a limited hazardous materials assessment performed on building materials for the purpose of identifying the presence and/or absence of asbestos containing materials, lead based paint and polychlorinated biphenyls / mercury containing electrical items that could affect the redevelopment of the property. Additional assessment and remediation of the contaminants will be required. In addition, an AAI Phase I Environmental Site Assessment (ESA) was completed for the Paterson Armory property in June 2008 and a Phase II Investigation was completed in March 2009. Both the Phase I and Phase II were funded with Passaic County, New Jersey USEPA Assessment Grant Funds.

The City of Paterson is interested in rehabilitating a historical asset, the Paterson Armory, and converting it into a new facility to provide the community with a place to gather and play. The City has prepared a Redevelopment Plan to designate the area surrounding the Armory as an "area in need of redevelopment" therefore allowing strategic development and revitalization of the site. The site will be converted into a Community Center providing a range of services and opportunities for athletic activities, as well as, educational and training opportunities for the local community.

Applicable Regulations and Cleanup Standards

For the asbestos abatement and stabilization and intact removal of lead based paint, the City of Paterson, in conjunction with a qualified and licensed environmental consultant, will need to

complete an asbestos and lead based paint survey. Surveys will have to be performed by appropriately trained and experienced AHERA building inspectors and NJDHSS lead inspectors/risk assessors. Asbestos abatement plans and specifications will have to be designed in accordance with all applicable federal, state and local laws. Once the abatement contractor is selected, a certified New Jersey Asbestos Safety Technician (AST) must monitor the abatement.

The removal of the underground storage tanks would be subject to the NJDEP Technical Requirements for Site Remediation (Technical Rules) N.J.A.C. 7:26E and the Administrative Requirements for the Remediation of Contaminated Sites (ARRCS) N.J.A.C. 7:26C. The City of Paterson, in conjunction with a qualified and licensed environmental consultant, will need to complete additional Site Investigation activities and a Remedial Action Workplan in accordance with all applicable state standards. The Remedial Action Workplan will be submitted to the NJDEP and Licensed Site Remediation Professional (LSRP) for comment and approval prior to cleanup and will form the basis for the tank removals.

Evaluation of Cleanup Alternatives

This section identifies various remediation alternatives that could be used to address the environmental contamination issues at the Paterson Armory property. The “No Action Alternative” is used as the baseline against which the other alternatives are analyzed.

Alternative One – No Action / Management Plan for Asbestos and Lead Based Paint

With this alternative, the City of Paterson would take no action to remediate the subject site. They would have management plans for ensuring the asbestos and lead based paint materials are not disturbed.

- Effectiveness: This alternative would not be effective at reducing the contamination or protecting human health and the environment as the asbestos and lead based paint would still be present on site. In addition, this alternative could prove to be a hindrance to potential redevelopers.
- Implementability: This alternative is implementable.
- Cost: The cost would be approximately \$15,000 per year to update the plan and make sure the asbestos and lead based paint materials are in good condition.

Alternative Two – Abatement of Asbestos and Stabilization and Intact Removal of Lead Based Paint and Removal of Tanks

- Effectiveness: This alternative would allow for the removal of hazardous materials and make the property more attractive for redevelopment. The structural integrity of the building is sound.
- Implementability: This alternative is implementable.
- Cost: The estimated cost to implement this strategy is approximately \$1.2 million.

Alternative Three – Demolition and Removal of Structure and Removal of Tanks

- Effectiveness: This alternative would be effective; however, it would still require the abatement of the hazardous materials prior to demolition. In addition, you would be unnecessarily removing a building that has sound structural integrity.
- Implementability: This alternative is implementable.
- Cost: The cost to implement this strategy would be excessive in comparison to the other two alternatives and would remove a building that has structural integrity according to reports.

Recommended Cleanup Alternative

The Remedial Alternatives were evaluated based on their effectiveness, their feasibility of implementation, and the costs of each alternative. The recommendation is alternative number two, abatement of the asbestos and stabilization and intact removal of lead based paint and removal of the tanks. This alternative provides the most effective and efficient cleanup strategy and the best protection for human health and the environment.