

**COMMUNITY INVOLVEMENT PLAN**  
for  
**39 WEBSTER STREET**  
**FORMER W.W. CROSS SITE**  
**JAFFREY, NEW HAMPSHIRE**  
**SITE CLEANUP PROJECT**

In support of US EPA Brownfields Cleanup Grant

## **OVERVIEW OF COMMUNITY INVOLVEMENT PLAN**

This Community Involvement Plan (CIP) outlines the strategy that the Town of Jaffrey (the Town) will employ to redevelop the property known as the Former W.W. Cross Site, located at 39 Webster Street in Jaffrey, New Hampshire (the Site). As the current property owner, the Town intends to remove hazardous building materials and remediate contaminated soil within the portion of the Site associated with the former manufacturing building and Site operations. The goal is to facilitate future Site redevelopment. The HBM abatement and monitoring, as well as the removal of contaminated soil, will be conducted by state-certified and licensed professionals

This CIP outlines how the Town will involve the public and key stakeholders, including nearby residents, Town officials, nearby business owners, and local community-based organizations, in the decision-making process regarding the environmental cleanup. The CIP is required because the Town obtained funding for the proposed cleanup from the United States Environmental Protection Agency (US EPA) through a Brownfields Cleanup Grant. This CIP fulfills a requirement of the grant and will improve the success of the future redevelopment by addressing stakeholder concerns through the community engagement process.

### **Project Description**

The Town plans to conduct cleanup activities to support Site redevelopment, which is anticipated to include mixed-use commercial and residential space. The Site cleanup and future redevelopment will significantly enhance the quality of life in Jaffrey by providing employment opportunities, affordable housing, a community gathering space, and access to healthy food. Additionally, the cleanup will remove human health and environmental impacts associated with known contaminated soils, groundwater, and hazardous building materials.

Site cleanup will be completed in two phases. Phase 1 will involve the removal of hazardous building materials and demolishing the aboveground portion of the former W.W. Cross manufacturing building and associated Site features. The goal of Phase 1 is to address the immediate public safety concerns related to the dilapidated manufacturing structure and allow access for subsequent soil remediation beneath the building's foundation. Phase 2 will include removal of the building foundations, contaminated soil remediation, and final Site restoration. In total, cleanup is expected to take between 16 to 20 months.

### **SPOKESPERSON AND INFORMATION REPOSITORY**

The spokesperson for this project is Jo Anne Carr, Director of Planning and Economic Development, who may be contacted at:

Jo Anne Carr, Director of Planning and Economic Development  
 Jaffrey Town Hall  
 10 Goodnow Street  
 Jaffrey, NH03452  
 603.532.7880 x110  
[jacarr@townofjaffrey.com](mailto:jacarr@townofjaffrey.com)

Relevant project documents pertaining to the Site will be retained in an information repository. The information repository is located at the Jaffrey Town Offices. Information in the repository may be reviewed by scheduling an appointment with the project spokesperson during normal business hours:

Town Office Hours:

Monday – Wednesday: 8:00 am - 3:30 pm

Thursday: 11:00 am - 6:00 pm

Friday: 8:00 am - 12:00 pm

Relevant project documents will also be posted to a webpage for the Site. The page is accessible using the following link:

<https://www.townofjaffrey.com/planning-economic-development/pages/ww-cross39-webster-street-site>

## SITE DESCRIPTION AND HISTORY

### Site Location

The Site consists of an approximately 11.29-acre parcel located at 39 Webster Street in Jaffrey, New Hampshire. The Site is partially developed with the remains of an approximately 98,000 square foot (sf) former manufacturing building, paved parking lot, and various accessory Site features such as an aboveground storage tank (AST) building, exterior transformers, and utility poles in the western part of the Site. The eastern part of the Site contains a capped waste tack pile landfill, and two retention ponds separated by an earthen berm. Site access is restricted by a chain link security fence.



Located in downtown Jaffrey, the area surrounding the Site features mixed residential and commercial use. To the south and west, the area is primarily residential, with a few commercial businesses, an American Legion Hall, and a ballfield. A former railroad right-of-way and commercial development border the Site to the north. Undeveloped land, which includes a former surface impoundment / lagoon related to historic Site operations lies to the east.

## Site History

### Operations and Ownership

According to previous reports, the Site consisted of undeveloped land with a small pond before the W.W. Cross Company constructed a tack factory around the early 1920s. The original factory footprint occupied the northeast portion of the Site and was later expanded to include additional factory and storage space by the early 1940s. Further expansion by 1953 shaped the present-day layout of the main building. Between 1955 and 1975, the AST structure and 20,000-gallon No. 6 fuel oil AST were added to the west of the main building.

Historic Site operations by the W.W. Cross Company included manufacturing tacks and fasteners for several industries, including upholstery, carpeting, and shoemaking. Operation by W.W. Cross ceased around 2000, after which the building was subdivided and repurposed for various commercial tenants. A major fire in June 2020 severely damaged the eastern part of the former manufacturing building, prompting an EPA-led cleanup in 2021 that involved demolishing part of the former manufacturing building and removing some associated asbestos-containing materials (ACM) and fire debris. Presently, the Site is vacant. The Town acquired the Site in October 2023 through a tax title taking and has since been working to develop a plan for its remediation and redevelopment that will contribute to the greater revitalization efforts in downtown Jaffrey.

### Summary of Site Conditions

The Site is regulated by the New Hampshire Department of Environment (NHDES) for the historic release of oil and hazardous materials (OHM) to soil and groundwater from former manufacturing operations and on-Site waste management/disposal practices (Site ID 198708007). In general, soil and groundwater impacts in the eastern portion of the Site are related to the waste tack pile landfill and historic industrial wastewater discharges to the off-Site lagoon. Impacts in the western portion of the Site have been attributed to former manufacturing operations and to a lesser extent historic fill.

The Town will use grant funds to facilitate the cleanup of the former manufacturing building and associated impacted soil and groundwater in the western portion of the site. The former Site operator previously oversaw cleanup activities in the eastern portion of the Site. The former operator is also responsible for ongoing long-term monitoring of residual impacts to groundwater. A summary of the major activities in each area of the Site follows. Information about the eastern portion of the Site is provided for informational purposes only.

### *Tack Pile Landfill and On-Site Waste Disposal Area – East Area*

Soil and groundwater in the eastern portion of the Site was historically impacted by chlorinated volatile organic compounds (CVOCs), metals, petroleum hydrocarbons, and cyanide. The source of these impacts was the reported on-Site disposal of waste tacks, nails, and spent kerosene in the tack pile landfill and former industrial wastewater discharges to the lagoon on the adjacent property to the east.

Response actions to address contaminated soil and groundwater in this portion of the Site were completed in 1980s and 1990s by the former Site operator. Closure of the former lagoon was completed

between 1982 and 1995 and involved contaminated soil and sludge removal and capping the former disposal area. Assessment and remediation of the waste tack pile landfill was conducted between 1994 and 1999 and involved contaminated soil removal and constructing a soil cap over the former landfill.

Currently, routine inspections of the tack pile cap along with long-term monitoring to track changes in groundwater and surface water quality in the eastern part of the Site are on-going. The monitoring is performed according to a Groundwater Management Permit (GMP, GWP-198708007-J-006) from the NHDES. The monitoring focuses on the area around the waste tack pile landfill and nearby retention ponds. Recent sampling results (April 2024) indicate Site conditions have improved; however, some parameters continue to exceed NHDES's Ambient Groundwater Quality Standards (AGQS) at select monitoring wells along the southern end of the landfill. The compounds of concern include cyanide, cadmium, 1,4-dioxane, sulfate, and chlorinated volatile organic compounds (VOCs), primarily tetrachloroethylene (PCE). Per- and polyfluoroalkyl substances (PFAS) have also been identified.

#### Former Manufacturing Area – West Area

Former manufacturing activities in the western portion of the Site impacted soil and groundwater around and below the main manufacturing building. The primary contaminants of concern in this area are metals (primarily cadmium and lead), polycyclic aromatic hydrocarbons (PAHs), cyanide, chlorinated VOCs, and to a lesser extent PFAS. The remains of the dilapidated former manufacturing building also contain various ACM, lead-based paint (LBP), and polychlorinated biphenyl (PCB)-containing materials.

To date, numerous site assessment and EPA-led cleanup activities have been conducted to address contaminated soil, groundwater, and/or hazardous building materials in this portion of the Site. A chronology and summary of the findings from this work are described below.

##### i.) Phase I Environmental Site Assessment (ESA) – 2017

In 2017, a Phase I ESA was conducted to support Site redevelopment. According to the Phase I ESA report, the assessment identified several areas of potential concern related to:

- Presence of hazardous building materials in the former manufacturing building,
- The reported presence and use of a former underground storage tank (UST),
- The presence and historic use of the 20,000-gallon No. 6 fuel oil AST,
- The presence of floor drains and sumps for industrial wastewater disposal, and
- Off-site properties associated with the known release of VOCs to groundwater

##### ii.) Hazardous Building Materials Survey – 2017

In 2017 a Hazardous Building Materials Investigation (HBMI) survey of the former manufacturing building identified ACM in several areas along with LBP and low concentrations of PCBs in select building materials. Surficial soil (i.e., up to 2-inches below ground surface) collected from locations along building perimeter also contained lead, which at some locations exceeded the NHDES's Soil Remediation Standards (SRS). The source of lead impacts to surficial soil is believed to be former LBP on the building exterior.

##### iii.) Phase II ESA Activities – 2019 to 2020

Based on the 2017 Phase I and HBMI findings, a Phase II and supplemental Phase II ESA was conducted. The investigation included drilling soil borings, installing groundwater monitoring wells, and collecting and analyzing soil, groundwater, and concrete floor slab samples from the former

manufacturing building. Overall, the assessment identified PAHs, VOCs, PCBs, petroleum hydrocarbons, and cyanide in the soil and groundwater beneath and around the building. The contamination was primarily attributed to former Site operations, specifically the discharge of liquid wastes to floor drains and sumps in the former plating and wastewater treatment area as well as a suspect creosote-type material that was identified in shallow soil around the southwest corner of the building.

iv.) EPA Removal Action – 2020 to 2022

In June 2020, a fire severely damaged the eastern portion of the former manufacturing building. A subsequent investigation by the EPA in October and December 2020 confirmed the presence of ACM fire debris. To address concerns about potential exposure to ACM, as well as Site access and the condition of the fire-damaged building, the EPA conducted preliminary cleanup activities. The cleanup involved demolishing a structurally unsafe portion of the building, removing an estimated 900 cubic feet (cf) of ACM, and installing a security fence. Cleanup activities concluded in April 2022.

v.) Phase II ESA Activities – 2023 to 2024

In 2023 and 2024, additional Phase II investigations were conducted to inform cleanup decisions for the Site. The additional investigation involved drilling more soil borings, installing new groundwater monitoring wells, and collecting and analyzing additional soil and groundwater samples. They also included a supplemental hazardous material survey and investigating a suspected UST below the building. The results were consistent with previous findings, identifying contaminants such as CVOCs, 1,4-dioxane, PFAS, cadmium, cyanide, the creosote-type material and PAHs in the soil and/or groundwater. No UST was identified. Hazardous building materials within the remaining part of the building were also confirmed in several locations.

### **Nature of Threat to Public Health and Environment**

The Town's cleanup grant will be used to facilitate the cleanup and redevelopment of the former manufacturing area in the western portion of the Site. The main environmental concern in this area is the presence of contaminated soil and groundwater as well as the presence of hazardous building materials that pose a risk of release to the environment. Based on previous investigations, contaminants of concern include CVOCs, 1,4-dioxane, metals (primarily cadmium), cyanide and PFAS in groundwater; PAHs, metals and cyanide in soil; and ACM, LBP, and PCBs in building materials.

The proposed cleanup plan will remove hazardous building materials and targeted contaminated soil. A phased approach to Site cleanup will be implemented because the building is no longer suitable for reuse and must be removed to address contaminated soils beneath the former plating and wastewater treatment areas, as well as PAH-impacted soil next to the southwest corner of the building. Phase 1 will include demolishing the aboveground building and accessory features to enable subsequent soil remediation activities during Phase 2. The Phase 1 execution will also involve abating ACM, LBP, PCB-containing materials, and removing several former electrical transformers located south of the existing building. The demolition phase will include removing ACM and the 20,000-gallon No. 6 fuel oil AST to demolish the on-Site accessory AST building. All materials will be removed for proper disposal off-site.

The Phase 2 soil remediation scope of work will be conducted after the existing building and accessory features are demolished and removed. The Phase 2 soil remediation plan involves excavating and removing cadmium-impacted soil beneath the former plating and wastewater treatment area, as well as PAH-impacted soil associated with the suspected creosote-type materials. Before soil removal, a remedial design characterization study will be performed to assess each area, with the goal to

precharacterize the limits of soil containing contaminant concentrations above the NHDES SRS. Below grade building foundations will also be removed during this phase to verify sub slab soil conditions prior to Site restoration. All materials will be removed for proper disposal off-site, and the Site will be restored using clean backfill.

To address short term risks during cleanup activities, the Town will require the implementation of engineering controls such a perimeter construction fence to restrict access to the Site, dust control, and control of storm water runoff. The combined efforts of the hazardous building materials abatement and soil remediation will support beneficial Site reuse. The remedial scope of work will control or eliminate of threats to human health and environment by effectively removing contaminant exposure pathways to future occupants, construction workers, and trespassers. The removal of impacted soil, particularly from below the former plating area, is also expected to eliminate an on-going source of groundwater contamination at the Site.

The cleanup approach was documented in a draft Analysis of Brownfield Cleanup Alternatives (ABCA), dated October 2023. Prior to implementation, a final draft ABCA will be prepared for Phase 1 and Phase 2 of the proposed remediation and presented to the community for input and feedback prior to finalization.

## COMMUNITY BACKGROUND

### Community Profile

The Town of Jaffrey is in the Monadnock region of southwestern New Hampshire. Incorporated in 1773, Jaffrey is a small, rural community with an estimated current population of 5,297. Like many other New England mill towns, Jaffrey experienced a period of industrial growth in the late 1800s and early 1900s. Manufacturing businesses such as W. W. Cross and the Warwick Textile Mills were developed in downtown Jaffrey along the Contoocook River and its connecting waterways. Today, many of these factories have closed, leaving behind vacant, dilapidated, and underutilized structures.

The target area for the cleanup is downtown Jaffrey, a neighborhood primarily consisting of multifamily units occupied by low- and moderate-income, and single head of household families with young children. Jaffrey faces pockets of poverty, with 12% of residents classified as low-income and 4% living below the poverty level. The estimated median per capita income for residents is approximately \$42,000. According to the EPA's environmental justice (EJ) mapping and screening tool (EJScreen), Jaffrey has an average unemployment rate of 5% and is affected by critical service gaps, such as a lack of health insurance coverage (8%, 75th state percentile) and limited broadband internet access (10%, 61st state percentile). The town also has limited access to grocery markets and is classified as 'low access' by the United States Department of Agriculture (USDA).

Sensitive populations to environmental health risks in Jaffrey include the elderly, children, women of childbearing age, low-income individuals, those with less than a high school education, and veterans. These groups primarily reside in densely populated areas and are disproportionately affected by blight and contamination associated with brownfields. According to United States Census data, approximately 17% of the population is over age 65. The Town ranks high in the prevalence of health issues that can be exacerbated by environmental contaminants, including asthma (53rd state percentile), cancer (64th state percentile), and heart disease (68th state percentile). The lead paint indicator, a value that represents the potential for potential lead-based paint exposure in a given area, is in the 68th national percentile.

## Evaluation of Displacement Effects

According to the EJScreen mapper, the Town is not a designated disadvantaged community. The Site cleanup and future redevelopment are not anticipated to result in the unintended displacement of the local population. Conversely, the cleanup and future reuse of the Site aligns with community goals of supporting at-risk residents by offering affordable housing, access to local food markets, and a community space. The Town will adhere to its Residential Anti-displacement and Relocation Assistance Plan as necessary during the Project.

## Chronology of Community Involvement

Over the past several years, the Town has held community forums, workshops, and public meetings to provide information, gather input, and assist the community in developing a shared vision for the future of the of the W. W. Cross site.

A table summarizing community involvement activities is provided below.

Date	Activity	Goals
June 2019	Community workshop: "Re-imagining the W. W. Cross Site" facilitated by the New Jersey Institute of Technology	Gather ideas from community members for future uses of the W. W. Cross Site.
October and November 2022	Community workshops: "Downtown Revitalization – Community Conversations" facilitated by NH Listens, UNH Carsey School	Gather community input on the priorities, values, and opportunities for the revitalization of Jaffrey's downtown.
July 2023	Real Estate Market Analysis completed for the Site consisting of public meetings, interviews with stakeholders, and market research conducted by Camoin Associates	Understand the potential redevelopment opportunities for the Site.

The Brownfields Advisory Committee (BrAC), will advise the Site cleanup, serving as a steering committee and offering recommendations to the Town Manager, Project Manager, and Select Board. The BrAC represents a diverse range of stakeholders. BrAC partners include the following organizations:

- Southwest Regional Planning Committee (SWRPC)
- Monadnock Economic Development Corporation (MEDC)
- Jaffrey Energy Committee
- Jaffrey Climate Initiative
- TEAM Jaffrey (Jaffrey's Main Street program)

The BrAC will convene at the first quarter of the grant period and will hold regular meetings to report on project progress, make recommendations, and gather community feedback. Meetings will be open to the public and be available in both in-person and hybrid options. Project information and updates will be shared on various online platforms including the Town website and a project Facebook page. Written updates will be posted regularly to the Town website and provided in print at the Town library and Town office. Additionally, periodic press releases will be issued to the local newspaper.

## Key Community Concerns

Jaffrey community members are concerned about preserving the historical character of downtown while also incorporating elements such as environmental sustainability, affordable housing, access to healthy food, walkability, retail opportunities, and community gathering space into the future Site redevelopment.

## CONTINUED COMMUNITY INVOLVEMENT

The Town of Jaffrey will continue to implement a concentrated outreach and engagement program to share regular updates on project progress and provide community members with opportunities to ask questions and share feedback.

A legal notice will be placed in the local newspaper announcing the intended cleanup at the Site and to notify residents of a public meeting regarding the abatement and remediation efforts. In conformance with Brownfields Cleanup Grant requirements, the legal notice will also announce that the information repository on this project, including the hazardous building material assessments and other environmental information is located online and at the Town offices and is available for viewing during normal business hours and at other times by appointment. The notice will also announce the start of a thirty-day (30) comment period on the CIP and Phase 1 and Phase 2 ABCAs. The Town will accept comments on the ABCAs during each comment period and will provide written responses which will become part of the administrative record. The information repository will be updated with the inclusion of all meeting minutes, status reports and other communications.

An ABCA for the proposed Phase 1 and Phase 2 cleanup activities will be prepared for the project. The ABCA for Phase 1 is expected to be made available to public for review and comment for a minimum thirty (30) day period beginning, 21 October 2024, and ending 25 November 2024. The CIP and ABCA are anticipated to be presented at a public meeting in late November 2024.

The following table provides the general sequence and estimated schedule for the proposed cleanup activities. As described earlier in the CIP, the schedule assumes Site cleanup activities will be performed during two (2) phases. Phase 1 will include abatement of hazardous building materials and demolition of the existing aboveground buildings and site features. Phase 2 will involve removal of the building foundation, excavation and removal of contaminated soil, and site restoration.

Task	Estimated Start	Estimated Completion
<b>PHASE 1 – HAZARDOUS MATERIALS ABATEMENT &amp; BUILDING DEMOLITION</b>		
Publish Phase 1 Public Notice on the Town's website and social media platforms*	21 October 2024	21 October 2024
30-day Public Comment Period for Draft CIP and Phase 1 ABCA	21 October 2024	6 December 2024
Public Meeting #1 - Discuss CIP and Phase 1 ABCA	25 November 2024	25 November 2024
End of Phase 1 Public Comment Period	6 December 2024	6 December 2024
Respond to Comments	6 December 2024	20 December 2024
Finalization of CIP, Phase 1 ABCA, Plans & Specifications	20 December 2024	6 January 2025
Public Meeting #2 – Pre-Cleanup Phase 1 Scope of Work	10 March 2025	21 March 2025
Phase 1 Abatement/Demolition Implementation	31 March 2025	30 June 2025
Public Meeting #3 – Post Cleanup / Closeout Phase 1	4 August 2025	15 August 2025
<b>PHASE 2 – SOIL REMEDIATION AND SITE RESTORATION</b>		
Publish Phase 2 Public Notice on the Town's website and social media platforms*	7 April 2025	7 April 2025
Phase 2 Remedial Design Characterization (after Phase 1)	May 2025	June 2025
30-day Public Comment Period for Draft Phase 2 ABCA	7 April 2025	7 May 2025
Public Meeting – Discuss Phase 2 ABCA	21 April 2025	21 April 2025
End of Phase 2 Public Comment Period	7 May 2025	7 May 2025
Respond to Comments	7 May 2025	23 May 2025

Finalize Phase 2 ABCA	23 May 2025	30 May 2025
Phase 2 Remedial Design Characterization (after building demo)	30 May 2025	20 June 2025
Public Meeting – Pre-Remediation: Phase 2 Scope of Work	4 August 2025	15 August 2025
Phase 2 Soil Remediation/Demolition Activities	1 September 2025	22 December 2025
Public Meeting – Post Cleanup / Closeout Phase 2	19 January 2026	6 February 2026
Submit Final Closeout Documentation to EPA and NHDES	July 2026	August 2026

\*Notice will announce public meeting, timing of 30-day public comment period, and availability of information repository.

The schedule dates may change based on community feedback, remedial design characterization findings, and review/approval of the relevant cleanup documents by EPA and NHDES. The schedule updates will be provided periodically, as needed.