

THE TOWN OF ADAMS RESPONSE TO PUBLIC COMMENTS RECEIVED

The Town of Adams received two documents in their request for public comment to the Curtis Fine Papers Draft Cleanup Application and Draft Analysis of Brownfield Cleanup Alternatives (ABCAs):

1. Public Comments, dated January 26, 2026, from Caroline Scully (Adams Resident)
2. Public Comments, dated January 26, 2026, from the Friends of the Curtis Paper Mill and Building Admirers (Mary Ciuk/Adams resident, Leni Fried /Co-Owner of The Old Stone Mill Center in Adams, Mike Augspurger /Co-Owner of The Old Stone Mill Center in Adams, Caroline Scully/Adams resident)

The Town of Adams provides the following responses to the general comments received:

Building Preservation:

The structural integrity of some of the buildings is beyond repair and poses a real safety concern. However, for historic properties that may be impacted by the assessment or cleanup of a site, the requirements of the National Historic Preservation Act (NHPA) may apply. If the grant is awarded, the Town will be required to consult with EPA prior to conducting any on-site activity that may affect historic properties to ensure that the requirements of NHPA § 106 are met. In addition, the cleanup activities will generally require coordination with the State Historic Preservation Office (SHPO).

Over the past several years, the Town has experienced multiple fire and police calls to incidents at the project site due to break-ins, vandalism, and illegal squatters. The Town conducted a formal procurement process to solicit private developer interest in the project site but received no response due to the extent of contamination.

Concern for release of hazardous materials during abatement/demolition:

If the grant was awarded, all cleanup activities would be carried out in accordance with applicable Massachusetts Department of Environmental Protection (DEP) and DLS rules and regulations, including 310 CMR 7.09 and 310 CMR 7.15. Clean up Alternatives #2 and #3 both include implementing engineering controls (e.g., dust suppression and air monitoring) during cleanup and demolition activities. This would help to ensure the neighboring properties would not be adversely affected during cleanup activities.

Subsurface Contamination:

Although building slabs can sometimes act as an impervious barrier to the subsurface, may building slabs can include trenches, floor drains, etc. and these can be potential pathways to the subsurface. Therefore, we cannot assume that the subsurface is not contaminated just because a slab is present. In fact, there were previous subsurface investigations completed at the site that identified impacts to the soil and groundwater. Implementing the proposed cleanup activities would remove the hazards associated with the building structures and provide access to the building footprints so that future subsurface assessment can eventually be completed (under additional funding).

Inclusion of Disposal Costs:

Cleanup Alternatives #2 and #3 include costs for transportation and disposal (T&D) of the hazardous materials to a regulated disposal facility. Offsite disposal of contaminated media would be conducted pursuant to 310 CMR 7.15, 454 CMR 28.00 and 40 CFR Part 61 Subpart M.

Community Engagement:

The Town is firmly committed to engaging our community throughout the grant process and ensuring that residents have meaningful opportunities to provide feedback. As future cleanup and reuse planning phases move forward, the Town will carefully consider and address community input so that the project reflects local priorities, supports long-term community goals, and delivers benefits that are responsive to the needs and concerns of our residents. We value the community's voice and will continue to provide clear avenues for participation, transparency, and dialogue as the project progresses.