

COMMUNITY RELATIONS PLAN

SHELTON BROWNFIELD CLEANUP (EPA/DEP) for the Axton Cross and Samarius Properties

CITY OF SHELTON, CONNECTICUT

1. OVERVIEW

The purpose of this Community Relations Plan (CRP) is to delineate the communication strategies that will address the needs and concerns of the citizens of Shelton, particularly the residents who are directly or potentially affected by the proposed removal of environmental contamination present at the downtown Canal Street area sites, notably the former Rolfite, Samarius, Chromium Process, Axton Cross and Cel-lastik properties (approximately 37 to 123 Canal Street).

This CRP explains how the City has involved and will continue to involve affected residents, City officials, and local organizations in the decision-making process regarding the environmental remediation efforts on the properties. As with the distribution of information and the coordination and facilitation of community outreach throughout the previous activities on the properties, the City, acting through the Shelton Economic Development Corporation, is primarily responsible for implementing community relations pertaining to the properties.

Active residents and institutions in the community are essential resources for the success of the CRP as they hold positions of responsibility within the community. The City of Shelton perceives these citizens and organizations as key points of contact and communication. One measure of success of the environmental remediation and subsequent redevelopment of the properties hinges on informed citizen involvement in each step of the remediation process.

Note that this plan is a modification of prior plans that have been implemented. For instance, work has already been conducted at the Rolfite site under a former CRP. This plan replaces the former plans in an effort to streamline the communications efforts under one plan.

2. SPOKESPERSON AND INFORMATION REPOSITORY

The spokesperson for this project is James E. Ryan, President, Shelton Economic Development Corporation, who may be contacted at:

Shelton Economic Development Corporation (SEDC)
475 Howe Avenue Suite 202
Shelton, Connecticut 06484
(203) 924-2521

The Information Repository is located at the Shelton Economic Development Corporation (SEDC) at 475 Howe Avenue, Shelton, Suite 202, Connecticut. The administrative record will be available from 9 AM until 4 PM, Monday through Friday at the SEDC office. At any time, the public is welcome to request information and ask questions. Emails are also accepted at sedc1@sheltonedc1.net.

3. SITE DESCRIPTION AND HISTORY

Site descriptions and histories are summarized in the Attachments.

4. NATURE OF THREAT TO PUBLIC HEALTH

Environmental concerns and threats to public health on are summarized in the Attachments.

5. COMMUNITY PROFILE

In 1999, 3.2 percent of Shelton's population lived below the poverty line. In the same year, 7.9 percent of Connecticut's residents and 7.7 percent of the people within the Naugatuck Valley Corridor (NVC) lived in poverty. Shelton possessed the tenth largest percentage of people in poverty within the NVC in 1999. Waterbury and Derby had the highest percentage of residents living in poverty in the NVC in 1999. Prospect and Oxford had the smallest percentage of residents living in poverty in the NVC in 1999.

Shelton is lower than CT (4.7 pts) and NVC (4.5) for people living in poverty (10 out of 17 for percent poverty in NVC). In total, 1,208 of Shelton's residents live in poverty. Shelton possessed the fourth highest number of residents living in poverty in the NVC in 1999. Waterbury and Naugatuck possessed the highest number of residents living in poverty within the NVC in 1999. Bethlehem and Prospect tied for the lowest number of people living in poverty among NVC cities and towns in 1999.

High number in poverty – 4 in NVC

Increases in Poverty in Shelton, 1989-1999. The population living in poverty in Shelton increased by 39 percent (from 867 to 1,208) from 1989 to 1999. The number of residents living in poverty increased by 30 percent in the NVC, and 19 percent in Connecticut, between 1989 and 1999. Shelton experienced the ninth largest percent increase in people living in poverty within the NVC from 1989 to 1999. Beacon Falls, Southbury, and Thomaston possessed the highest percent increases in poverty population in the NVC from 1989 to 1999. During this ten-year period, five NVC towns (Bethlehem, Prospect, Watertown, Middlebury, and Seymour) experienced a decrease in the number of residents living in poverty.

9th highest percent increase in poverty population (39%) in NVC. Shelton's poverty population increased by 341 residents between 1989 and 1999. Shelton experienced the fourth largest increase in the number of residents living in poverty within the NVC towns from 1989 to 1990. Within the NVC, Waterbury and Naugatuck's poverty populations grew by the largest number of people whereas Watertown and Seymour's poverty populations decreased by the largest number of residents from 1989 to 1999.

Brownfields cleanup in this area has been determined to have a regional impact and the benefits are far reaching. In regards to the actual target area it is located in the census tract with the highest percentage of low and moderate income individuals, houses a grammar school with the highest percentage of Title One students, and is several blocks from the site of a proposed homeless shelter. Two homeless individuals have perished at or in the vicinity of these sites. The community prides itself on its diversity: of populations, interests and facilities.

6. Explain how the Targeted Community will Benefit from this Work

Brownfield's in our community have led to the decline and underutilization of our former Central Business District, currently known as the City of Shelton Downtown Revitalization Area. This has led to job loss and out migration and loss of tax revenue. There are approximately 70 acres of land and building that are known to or most likely have some historical contamination which affects its productive economic use or presents a threat to the public health and safety. The City of Shelton has embarked on a program of Brownfields redevelopment and this initial application is in support of the second phase of that effort.

The targeted community will benefit from this grant in four primary ways. First, the site cleanups will reduce threats to human health in the area. Second, the site cleanups will reduce risks to the environment, particularly in the ecologically sensitive waterfront area. Third, the cleanups will facilitate the properties' redevelopment for new private investment and for the extension of the City of Shelton river walk a popular local and regional asset. Fourth, the cleanup will complete the conversion of the properties from community blights into a community assets.

7. CHRONOLOGY OF COMMUNITY INVOLVEMENT

1. Creation of Citizens Advisory Committee in mid 1980s
2. Adoption of Shelton Enterprise and Commerce Park in 1997 for public approval process and referendum
3. Phase 1 Implementation from 1997-present with monthly citizen meetings
4. Phase 2 Implementation from 2000-present with monthly citizen meetings
5. Shelton Farm and Public Market (adjacent brownfield site cleanup) from 2000-present with monthly citizen meetings
6. Demolition of all above ground facilities with DECD grant
7. Planning for reuse of site with citizen participation
8. Development of various grant applications with Citizen Advisory Committee presentations and pre-application public notifications and meetings
9. Planning for Rolfite, Samarius and Axton Cross remediation activities with Citizen review and meeting over a multi year period include various hearing requirements.
10. Continuing designation of SEDC as information depository
11. Ongoing outreach to targeted audiences with each program
12. Coordination with Valley Council of Governments for supplementary activities at Rolfite site.
13. Monthly meeting with Citizens Advisory Committee with regular updates on all Brownfields activities. Monthly meetings with SEDC Executive Committee for program and contract management and review of community engagements
14. Incorporation of Brownfields as a priority in a regional US EDA program strategy.

The community has already been involved in reuse planning, as this project has been discussed at several community meetings beginning in 2000 and multiple other occasions since then. The community is actively engaged in the support of the redevelopment of the property. The community will continue to be involved through the Citizens Advisory Committee and Community Involvement meetings.

City works with State DEP, State DECD, the Shelton Economic Development Corporation and the Regional Brownfields Pilot and local Citizen Advisory Committee which is consulted for site inventory, site selection, and reuse planning decisions. Beyond that, there have been a variety of community involvement activities including a newsletter and more recently with the inclusion of an article in the City of Shelton Annual Report for distribution to every residence and business in the community. We have worked closely with the State of Connecticut Department of Environmental Protection (CTDEP) on site assessment and cleanup issues. CT DEP actively worked with Shelton to secure funding for assessment and cleanup activities. Finally, Shelton has representation on the Regional Brownfields Pilot through Mayor Lauretti's appointment to the group. This provides strong linkage to state offerings through the Connecticut Department of Economic and Community Development (DECD).

8. Brownfields Site Identification

The City works with State DEP, State DECD, the Shelton Economic Development Corporation and the Regional Brownfields Pilot and local citizen's advisory committee all of which are periodically consulted for site inventory, site selection, and reuse planning decisions.

9. U.S. EPA Brownfields Cleanup Grant

The US EPA grant will be devoted to implementation of the approved EPA work plan leading to a permanent resolution to site remediation issues governed by the EPA and CT DEP. The City of Shelton will be providing the required match and in-kind assistance as may be necessary.

10. Brownfields Initiative Communications

The City has established a system for communicating its brownfields project progress to the community through the distribution of project fact sheets and press releases to the local media. Periodic update meetings focus on providing information on environmental assessment results, cleanup activities,

stakeholder negotiations (if any), and redevelopment strategies. Project consultants present this information to prevent any inaccuracies in disseminating technical information. The City prepares project update fact sheets that relay project status, redevelopment plans, funding strategies, and the general project timeline, through its Shelton Life publication which is delivered to every Shelton home and business and which is also available on the City of Shelton website. Finally, the City works closely with the local newspapers to prepare articles on its brownfields initiatives at critical junctures.

In order to solicit public comments on the approach to remediation, a clear understanding of the site background, the existing health and environmental risks, and need for response actions will be provided. Summaries of data and applicable State regulations will be presented for review prior to implementing major cleanup tasks – also a requirement of EPA grantees.

11. Outreach to Sensitive Communities

The City is reaching out to those persons with the greatest exposure to the properties, and focusing particularly on the sensitive communities identified: African-American minorities, minors, and low-income persons. Many of the children and families who live in the affected community participate in programming at the Boys and Girls Club. Taking advantage of these established activities, the City will present information to the Directors and Staff of the Boys and Girls Club, Training Education and Manpower (TEAM) for dissemination to the sensitive communities. The Valley Health Department will also receive information on programmatic activities.

12. KEY COMMUNITY CONCERNS

The goals of Shelton's Brownfields Initiatives are:

- To create developable land within the downtown for business expansion and public uses
- To eliminate blight
- To reconnect the downtown to the riverfront and to reconnect the downtown to adjoining communities through investments in public infrastructure that will promote safe, convenient, and handicapped accessible public streets and sidewalks
- To improve the health and safety of the adjacent residential neighborhoods
- To redevelop industrial and commercial land into appropriate and viable land uses including industrial, commercial, and residential uses, as well as recreational and green space uses.
- To promote new tourism opportunities to attract visitors to the community

These issues form the basis of the recommendations in the redevelopment strategy for the properties.

13. Continued Community Involvement during the Implementation Phase of the EPA Brownfields Grant

The community will be involved prior to implementation of the cleanup activities via public review periods and public meetings announced and held to discuss the cleanup approaches. During work activities, the public will be allowed to request information and submit questions to the SEDC at any time. On behalf of the city, the SEDC will provide the administrative oversight of the contracted work on-going. Progress reports will continue to be provided in the quarterly Shelton Life newsletter distributed to all homes and businesses.

14. Future Community Partnerships

Once the remediation planning process and cleanup for the properties are complete, the City will continue to work with the community to develop ongoing strong partnerships for future Brownfields activities anticipated in the Shelton Enterprise and Commerce Park, and adjoining downtown revitalization neighborhoods, as needed to analyze the plans and to make recommendations and seek funding for implementation. The City considers it important to be practical, yet creative in both the plan and its implementation.

15. Notice of Actions to the Community and Comment Period

In conformance with EPA guidelines, a legal notice will be placed in the local newspaper announcing the intended response actions at the properties. The legal notice will also announce the location of the repository of information on these projects, which will include this Community Relations Plan, the Draft Remedial Action Plans/Memorandums, environmental assessments, risk assessments, and other environmental reports. This information will also be posted on the City's website. Notices for each property will also announce the start of a thirty-day comment period on the draft Remedial Action Plan/Memorandum. The City of Shelton (SEDC) will accept comments on each plan during the comment period and will provide written responses that will become a part of the administrative record. The information repository will be updated with the inclusion of all meeting minutes, status reports, and other communications as they are generated. Information will be specific as it relates to meeting both State and Federal requirements.

Cleanup Plan for Soil and Groundwater Former Axton Cross and Cel-Lastik Properties 93 to 113 Canal Street

1. Background

As a result of former industrial operations at the former Axton Cross (113 East Canal Street) and Cel-Lastik properties, soil and groundwater below the sites became contaminated. Historically the area has been used by a bolt manufacturer (1800s to 1940s), a chemical manufacturer that prepared and mixed cleaning chemicals and powdered metals (1948 to 1971), and later by a roofing company, and a landscaping and carpentry company.

Environmental investigation revealed high concentrations of volatile organic compounds (VOCs), primarily the chlorinated solvents tetrachloroethene (PCE) and trichloroethene (TCE). Petroleum hydrocarbons and heavy metals are also present and those concentrations have exceeded applicable state criteria in some areas of the site.

During initial remedial activities and site revitalization efforts, the city removed many underground tanks and petroleum-contaminated soils. Existing buildings were demolished and removed from the sites and clean soils were put in place at the surface.

The Axton Cross site is still vacant, while its neighboring property at 93 Canal Street has become the new Veteran's Memorial Park.

What is left to do at the park is finalizing groundwater cleanup and providing a cover to surface soils in the corner where there is heavy vegetation. At Axton Cross, the groundwater requires remediation as well as a pocket of soil that contains remnants from what appears to be discharges of solvents to the subsurface soils.

2. Interim Cleanup Plan

The City has secured additional grants from the U.S. EPA and the Connecticut Department of Economic and Community Development (DECD) - Office of Brownfield Remediation and Development (OBRD). Various remedial technologies were evaluated based on cost, remediation time periods, implementability, and redevelopment potential.

The overall remediation approach is to remediate the site in accordance with the Connecticut regulations in phases as funding is made available and as site development is planned and implemented. This cleanup plan focuses on Phases 1 and 2 to target the most

contaminated soil and groundwater that serve as long-term sources and limit site development.

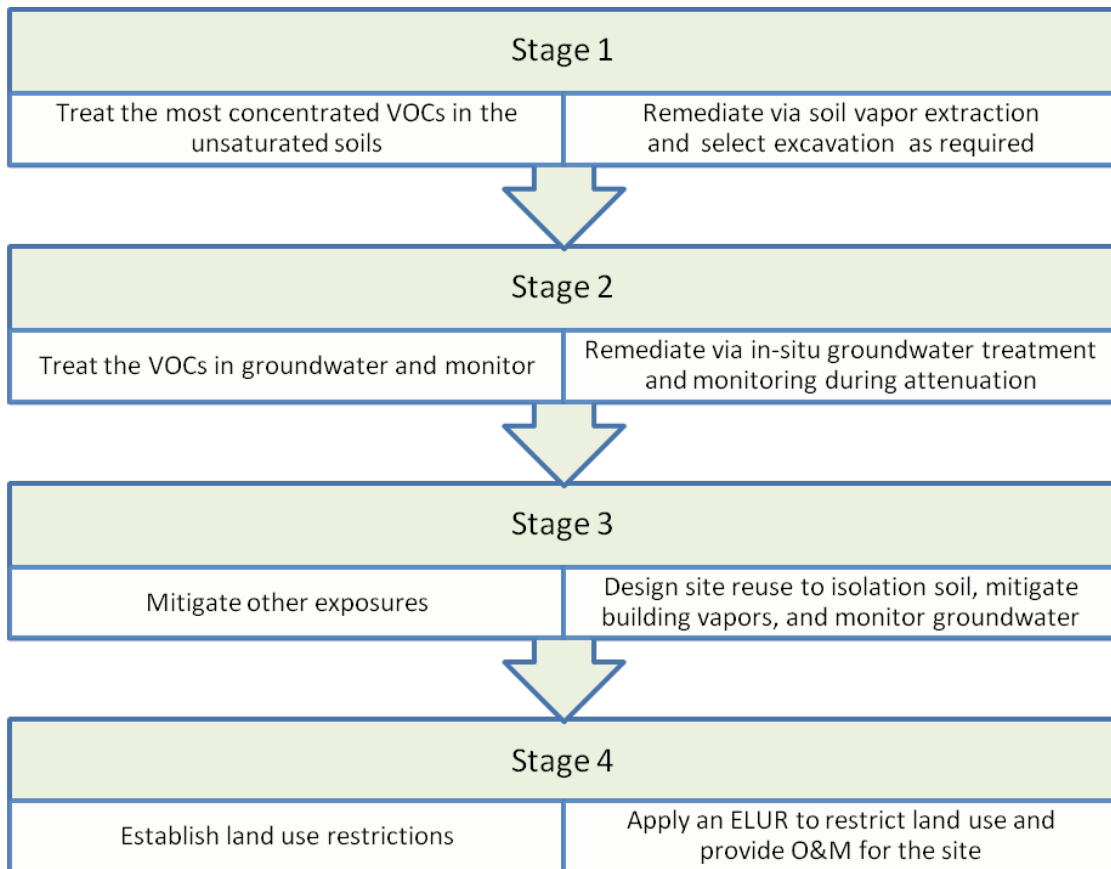
Soil -- For contaminated soil above the water table (surface down to approximately 10 to 12 feet), soil vapor extraction (SVE) was the alternative selected as the primary means of remediating the VOC-impacted soils. SVE extracts volatile chemicals from the subsurface by applying a vacuum to a network of extraction points to create flow in the soil and collect and treat the vapors. The SVE system will operate continuously for a period of 12 to 18 months. Periodic monitoring will be used to optimize system performance and to determine when the system can be shut-down.

Groundwater -- In-situ (in the ground) remediation will be performed for treatment of the most contaminated groundwater and soil below the water table. A remedial solution will be injected consisting of iron (zero valent iron or ZVI) and carbon (benign agents). The iron will react directly with the chlorinated VOCs. In addition, both the iron and the carbon generate conditions in the ground that are favorable for growth of natural bacteria that can degrade the contaminants of concern. Injection activities will be completed over several weeks and then allowed to react in the ground. Groundwater samples will be collected after the injection to evaluate the reduction of contaminants and if any follow-up injection will be necessary. The remediation solutions that will be added have an active lifetime in the subsurface of one to five years, so reduction in concentrations will proceed long after the injection. An additional advantage of in-situ remediation is that there is no active system operation - allowing above ground redevelopment to proceed. It is more cost effective than traditional pump and treat systems.

3. The Future

Following remediation, the site is proposed for mixed use development and will likely include a building for commercial or commercial/residential use. Redevelopment will incorporate green space, and the riverwalk will be extended across this property along the river bank. Additional engineering measures will likely be required to protect site users from other contamination at the site. Such measures may include engineering barriers, vapor mitigation for future building(s), and/or land use restrictions. These future protective measures are required by regulation and will be determined when redevelopment plans are prepared.

A summary of the phased approach:



Cleanup Plan for the Former Samarius Property 123 Canal Street

1. Background

The site is located on a 0.46 acre parcel along East Canal Street in Shelton, Connecticut, bordered by railroad tracks to the north. The site is currently vacant. Two floors of the former Samarius Industries building crossed over Burying Ground Brook, which flows west to east along the southern boundary of the Site. While active, the former Samarius Industries building was serviced by City water and sewer.

The area in which the site is located is zoned for industrial/commercial use, and is included as part of the Shelton Enterprise and Commerce Park (SECP), a brownfield site undergoing redevelopment planning and construction.

The groundwater is classified "GB" in this area, meaning it is assumed to be impacted by historic land uses and unsuitable for human consumption without treatment. Municipal water supplies service the area. Based on topography of the area and the location of the nearby Housatonic River, groundwater flow is to the southeast, toward the Housatonic River. The Housatonic River is abuts the Site to the east and is classified "SC," with a goal of improving its quality to "SB." The Burying Ground Brook, which crosses through the southern portion of the Site is classified as "A".

The Site was formerly occupied by a 19,000-square foot, three story brick building. Built in 1887, with an addition built in 1896, the building was continuously occupied from 1887 through 1985. Various industrial activities took place over this time, including, box manufacturing, brass and silver goods manufacturing, cloth and textile manufacturing, and lastly, Tiffany lamps electronics control (Samarius Industries). Samarius stopped operations in 1985. From 1985 through 2000 the Site was unoccupied and damaged by several fires. In the spring of 2000, under an alternative work practice permit, the Connecticut Department of Public Health razed the building remains. Asbestos containing materials (ACM) were abated from the building debris and disposed of off-site. Non-ACM debris was left on site as backfill material.

During a Phase II site inspection and investigation by CTDEP in 2000 a fuel oil tank was found abandoned in place on the Site. Approximately 1,400-gallons of liquid, primarily water, were pumped from the 2,000-gallon

tank. The tank appeared to be previously damaged due to a triangular hole observed on the top of the tank. The tank was subsequently removed along with 150 tons of impacted soil.

2. Findings of Environmental Assessments

Based on previous investigations, the contaminants of concern (COCs) identified in soil at the site are extractable total petroleum hydrocarbons (ETPH), semi-volatile organic compounds (SVOCs) and metals (specifically lead and arsenic) in soil; and volatile organic compounds (VOCs), and metals (specifically cadmium and arsenic) in groundwater. Surface water samples from Burying Ground Brook did not have any contaminant concentrations of concern. The source of the soil COCs appears to be from previous site on-site and off-site operations, including metal plating and chemical manufacturing, and from the commingled building debris and ash on-site. The COCs in groundwater are possibly from previous on-site and off-site operations.

3. Interim Cleanup Plan

Several remedial alternatives have been considered to address both direct exposure and pollutant mobility exceedances at the site and meet the requirements of the RSRs. These include:

1. Removal and off-site disposal of all contaminated soil and sediments, to concentrations below regulatory levels;
2. Construction of an engineered control (impermeable pavement) across the surface of the site; and
3. Removal of upper contaminated surface soils and installation of an engineered control (impermeable liner) and clean fill.

These options are under evaluation as the design of the city's riverwalk continues. The placement and design of the riverwalk will help conceptualize the site cleanup. To realize cost and energy efficiencies with both projects, attempts to integrate the work for each will be made. For instance, the subbase materials of the riverwalk can be integrated into an engineered barrier that would serve as an isolation barrier to the contaminated soils.

This planning process is progressing under the direction of the SEDC.

Scope of Work Summary – Valley COG Brownfields RLF Program
Rolfite Property – Shelton, Connecticut
June 22, 2010

Task 1. Community Involvement

To support the grant requirement for community involvement, the Qualified Environmental professional (QEP) EP for the SEDC will attend one public meeting, and providing comment/response support within the budget allocated. Minor support and expenses are anticipated (copying fees only).

Task 2. Cleanup Planning and Reporting

Cleanup planning will include the following subtasks:

- a) Revision of the QAPP to include updated sample locations and analyses for confirmatory sampling.
- b) Design of asbestos abatement and demolition of annex building and boiler room. This includes the review of the annex building by a structural engineer to determine how the annex building can be demolished without loss of integrity to the Spongex building. It also includes a utility survey for potentially impacted utilities within the work area.
- c) Prepare specifications and obtain competitive pricing for asbestos abatement, tank removal and demolition of each building (annex and boiler room).
- d) Prepare specifications and obtain competitive pricing for the removal of the floor drain vault and up to 200 tons of non-hazardous waste solids.
- e) Prepare reports for documenting progress including data, photos, costs, labor, and MBE/WBE utilization during the project. Coordinate site activities and communicate with SEDC regularly.
- f) Prepare a report that documents the activities proposed, including all documentation generated as part of the work activities plus data, photos, and field logs.

Pricing for vendors will include measures for documenting inclusion of WBE and MBE firms and application of prevailing wages.

Task 3. Site Cleanup

Services are anticipated to include asbestos abatement of each building (annex and boiler room), removal of tanks and drums from each area, demolition of the buildings, and excavation of the floor drain vault with the removal of contaminated soil. Competitive pricing will be obtained for well drilling, asbestos removal, building demolition, tank removal and soil excavation. In summary, the following key tasks are proposed:

- a) **Floor drain for former manufacturing building.** Excavate the abandoned floor drain vault and associated sludge, concrete and potentially contaminated soils surrounding the system. It is estimated that 100 to 200 cubic yards of sludge and soil will be stockpiled for analysis and disposal. Collect confirmatory samples from the vault excavation and backfill to existing grade.
- b) **Former boiler building.** Remove the AST and characterize and remove the abandoned tanks/vats located in the former boiler room. Abate asbestos insulation from the boiler and pipe system and remove boiler. Note that the building will likely need to be demolished in order to safely remove the AST and the boiler as they are very large items and the building is in poor condition. It is also anticipated that up to 100 cubic yards of contaminated soil and concrete from below the building (AST area) will be characterized and disposed off-site. Collect confirmatory samples.
- c) **Annex building.** Abate asbestos identified in this small annex building and remove the AST located inside. Due to the condition of the building, it is anticipated that the building will require demolition prior to safe removal of the AST.
- d) **Groundwater monitoring.** Per State regulations, new wells need to be installed and monitored to demonstrate compliance with groundwater criteria and demonstrate that subsurface conditions are improving. Four new wells are anticipated.

Project Milestones and Targets

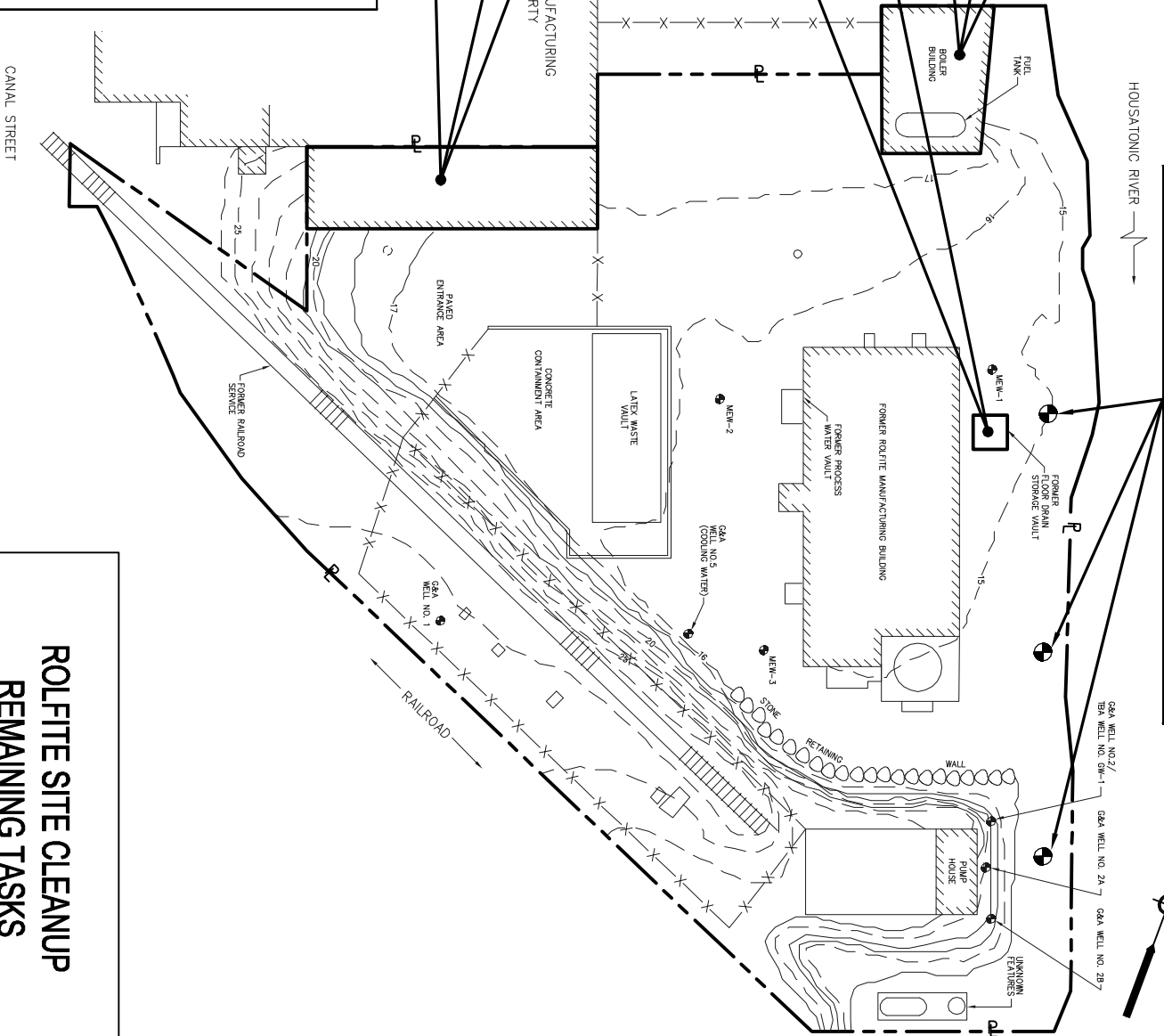
Task	Time frame (from notice to proceed)	Billing cycle (from notice to proceed)
Task 1	Month 1 to 2	1 st quarter
Task 2; subtasks a through d (plans, specs, and QAPP)	Months 1 to 3	1 st quarter
Task 3; subtasks a through c (physical remediation)	Months 4 to 6	2 nd quarter
Task 2; subtasks e and f (documentation and reports)	Months 6 to 9	3 rd quarter
Task 3; subtask d (groundwater evaluation)	One year for completion	4 th quarter

Implement Post Remedy GW Monitoring



- Remove AST and Boiler
- Remove containers and dispose of fluids
- Abate asbestos and demolish
- Remove concrete vault and floor drain system
- Stockpile, characterize and dispose of soil/sludge
- Abate asbestos
- Remove AST
- Demolish unsafe walls/roof section and dispose

- Completed with Other Funding:**
- ✓ 4-story transite building abated and removed
 - ✓ Magnesium oxide silo removed
 - ✓ Tanks/vessels and above ground tanks removed
 - ✓ Three (3) 33,000 gallon USTs were removed
 - ✓ 6,000 gallon fuel UST removed
 - ✓ Waste storage vaults (60,000 gallon) closed
 - ✓ Vault wastes disposed off-site



ROLFITE SITE CLEANUP REMAINING TASKS