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Town of Stafford  
Public Notice

**PUBLIC NOTIFICATION FOR EPA BROWNFIELDS CLEANUP GRANT**



Amber Wakley  
Town of Stafford

The Public is hereby notified that on December 1, 2021 the Town of Stafford will apply for a Brownfield Cleanup Grant from the U.S. Environmental Protection Agency's Brownfields Program. If funded, the grant would provide funding for the cleanup of the former Earl M Witt School site located at 20 Hyde Park Road in Stafford, Connecticut. As part of the application process, the Town of Stafford is required to obtain and submit public comment with the proposal. The application includes an Analysis of Brownfields Cleanup Alternatives (ABCA) for the site. **A copy of the draft application, including the draft ABCA, will be available on the town's website, [www.staffordct.org](http://www.staffordct.org) or [www.explorestaffordct.com](http://www.explorestaffordct.com) for public review and comment beginning November 19, 2021.** Interested parties may submit written comments on the draft application and draft Analysis of Brownfields Cleanup Alternatives document by contacting Amber Wakley, Town of Stafford Grants & Marketing Specialist, at [amberw@staffordct.org](mailto:amberw@staffordct.org) or 860-851-8102. Please use the subject line "EPA Brownfields Cleanup Comment." All comments must be submitted by Monday, November 29, 2021, at 1:00 p.m. and will be attached to the application.

A public Zoom meeting will be held on **November 22, 2021, at 5:00 p.m.** to present the draft application and ABCA and to solicit input from the public, prior to submittal of the application on December 1, 2021. The meeting and instructions on how to access the remote participation platform are provided below and will be posted on the Town's website or may be requested by contacting Amber Wakley, Town of Stafford Grants & Marketing Specialist, at [amberw@staffordct.org](mailto:amberw@staffordct.org) or 860-851-8102.

Members of the public and/or parties with a right and/or requirement to attend this meeting may access via remote participation through any one of the following ways:

- Enter this link into your web browser to open the Zoom website: <https://zoom.us/join>. Enter the Meeting ID# **814 7448 7816**, Passcode: **596002**, as directed on the webpage and click "Join". Enter passcode: 596002. Follow the on-screen instructions to join the meeting.
- Participants can dial **+1 929 205 6099** to join the meeting. When prompted, enter Meeting ID# **814 7448 7816**, Passcode: **596002**, and follow the instructions to join the meeting.

## 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

### 1.a. Target Area and Brownfields

**1.a.i Background and Description of Target Area** - A traditional New England mill-town, Stafford is one of the small and rural Connecticut towns that maintain their colonial character. The Town's natural beauty and famous mineral springs have attracted settlers into the area since its incorporation in 1719. Today, Stafford is an attractive destination for tourists, gathering events and seasonal residents, which attract thousands of people every year. With access to all major Northeast metropolitan areas including New York and Boston, Stafford's central location is appealing to both families and businesses. Although Stafford is the third largest town in the State in terms of land area, it maintains a small community feeling (less than 12,000 residents). A well-developed downtown, commercial corridor, a growing residential community, and unique industrial resources, Stafford is an ideal location for both recreational and business activities. **Like most of New England, Stafford's industrial past was anchored in manufacturing and river mills, leaving behind numerous contaminated and dilapidated properties.** The colonial character of the Town fostered major industrial activities since the 1850s and early 1900s, establishing the Town as one of the largest industrial communities for cotton and wool, machinery, metal products, and others. Stafford is home to major manufacturers such as TTM Technologies and American Woolen Company which are large parts of the current industrial culture. **Once most of these industries closed down in the following years, they left behind abandoned and underutilized properties and the Town experienced significant economic hardship. Today the residents of Stafford are forced to cope with lasting environmental, economic, and health risks associated with these brownfield sites.** Plagued by environmental and welfare challenges, the residents of the Town are in desperate need of economic growth.

**The Target Area for this grant is Stafford, the center of the Town (downtown, census tract 8901003), which is a (< ¼ mile) to a designated Environmental Justice (EJ) community.** The Witt School (the "Site") is located at 20 Hyde Park Road, less than half a mile from the Town Hall in a central area of prime development. Although the Target Area is centrally located in the heart of the community, the presence of several underutilized buildings is an impediment to the economy and revitalization of the area. Hyde Park, where the Witt School is located, provides recreational opportunities for the community, such as hiking trails, concerts, and winter activities. Amongst the other five significant Brownfields sites near the Site, and other potentially contaminated properties, the Witt School was selected by the community as their highest priority due to the centralized location and easy access to the public.

**1.a.ii. Description of the Brownfield Site** - The Site is in Stafford's 157-acre Hyde Park, behind Main Street and Connecticut Route 32 and Route 190. **The Site is currently located in a flood plain (zone B: areas between limits of 100-year flood and 500-year flood),** in near proximity to a pond. The Site was initially Isaac P. Hyde's mansion and then was transferred to the Town of Stafford in the early 1900s. After 1937, the site was remodeled to the Witt School, which first operated in 1939. The vacant, two-story approximate 20,200 square-foot, brick, slab-on-grade structure includes a parking lot area. The building was decommissioned by the Board of Education in 2007 with the responsibility given to the Board of Selectmen. Over the past year, the Stafford Historic Commission, State Historic Preservation Office representatives, Connecticut Trust for Historic Preservation, and Town Selectmen have attempted to determine a reuse plan which preserves the site's historical integrity. **Graffiti, vandalism, and other signs of trespassing and criminal activity are present. The main environmental concern at the Site is the presence of hazardous building materials.** Several Hazardous Building Material (HBM) assessments have been performed at the Site. In 1991 and 2010, Asbestos Containing Materials (ACM) were found in interior rooms including classrooms, offices, stairwells, cafeteria, bathrooms, and other areas. ACM was also found in the pipe insulation and pipe fittings, and on the exterior, in window glazing, the gym roof and the 1953 roof. **Lead paint was also identified on brick walls, window frames, and on doors in the building.** In December 2020, a limited HBM investigation included sampling for Polychlorinated Biphenyls (PCBs) in

caulk, and to evaluate if PCBs were present in air within the building. PCB-containing ballasts and PCB-containing building materials were identified and will have to be removed due to the CT Department of Energy and Environmental Protection (CT DEEP) requirements. **Air sampling also identified concentrations of PCBs exceeding the residential screening level for indoor air that will need to be addressed to reduce the risk posed to potential future building users.** The suspect source of PCBs in air is the significant amounts of damaged / peeling paint. The overall structure of the building appears to be stable, but there is some water damage.

### **1.b. Revitalization of the Target Area**

**1.b.i. Reuse Strategy and Alignment with Revitalization Plans** - Stafford's overarching goals are to preserve the attractiveness of the community, increase growth of employment and tax base, and improve the overall quality of life of its residents. **According to the 2012 Plan of Conservation and Development (POCD), commercial development is encouraged in the downtown where many underutilized buildings are present.**

As part of Stafford's Brownfields Initiative, the Town has an active community survey garnering more than 300 responses that provide feedback on community development needs and ideas for redevelopment uses of the former Witt School. The town also issued a Request for Interest, Ideas, and Innovation to prospective developers. **The most favored redevelopment scenarios derived from community input included improving access to food, public recreational amenities, and affordable senior housing.** The project, a mixed-use, the mixed-income building utilizes the bottom floors to create a permanent farmers/cooperative market, including a farm-to-table dining experience. The vision appeals to Stafford's rich agricultural heritage and robust farming community, while generating a hub for social activity to promote economic growth. **Given that Target Area is a USDA-designated food desert, the suggested reuse would ameliorate the desert conditions by providing access to affordable and nutritious food. The proposed mixed-use space retains the existing gymnasium and kitchen, developing space for much-needed recreation and entertainment opportunities while providing a legal space for farmers and entrepreneurs to pursue certified food ventures.** In addition, and partnership with the Stafford Housing Authority, **the upper floor would be converted into affordable senior housing with an adult day care center.** Up to 25 units of affordable housing for seniors is envisioned, with shared access to the gymnasium and kitchen to augment activities for the adult day care center.

**Since the Site is currently located in a flood plain, the suggested redevelopment will align with the allowable land-uses for the area.** Stafford is a small town that takes pride in agricultural history yet lacks an outlet to express that passion and pride. This development allows for the high utility parking lot, which is attached to the Witt School, to stay intact for other uses within the park. The intended mixed-use facility also offers the opportunity for a minimalistic redevelopment plan, which would be cost-effective. An enhanced facility will breathe new life into the former Witt School while bridging access to healthy food, affordable housing, and recreation amenities. The project encourages entrepreneurship, sustainability and will significantly enhance the quality of life in Stafford.

**1.b.ii. Outcomes and Benefits of Reuse Strategy** - Stafford's revitalizing strategy will stimulate economic development by providing an avenue for the town's farming community and increasing the Target Area and local community's property values. The funds requested will help to transform the blighted property within the heart of downtown Stafford into a space that the whole community can take pride in. The Site currently poses a hazard to human health and the environment, including asbestos, PCBs, and lead HBM. The cleanup and reuse of the site will remove these hazardous substances, allow for the beneficial reuse of this beloved community building, **stimulate economic development by providing vending opportunities to small businesses and farmers in the area. In addition, the proposed project will also provide critically needed senior affordable housing and adult day care center.** Adult Day Centers are necessary for persons with cognitive impairments

that cannot stay in their homes during the day while their families are working. These reuse strategies includes **social and health benefits for residents of Stafford, provide easy access to locally grown, organic, and healthy food while providing a social connection to the seniors, farmers and rest of the community.** The proposed redevelopment will encourage a sense of community among residents, and attract visitors from nearby towns. Reuse of the Witt school will greatly add to the utility of the town by helping to round out the community center and “Main Street” attractions which sit in close proximity to the school. Furthermore, reuse will serve as a catalyst in the effort to revitalize many of the other potential brownfield locations within the town. With some brownfields being located on the river which runs through the town, **further revitalization could provide opportunities for renewable hydro-energy sources and new renewable energy developments.** The proposed site redevelopment is **< ¼ mile from the EJ community (Block Group 1, Census Tract 8901), and the requested EPA funds and site redevelopment would directly benefit disadvantaged communities in Town.** The addition of a sustainable, locally stocked farmers market would complement the objectives of the EJ community well.

### **1.c. Strategy for Leveraging Resources**

**1.c.i. Resources Needed for Site Reuse** - Over \$600,000 is needed for the HBM cleanup at the Witt School according to a April 2021 cost estimate and reuse plan prepared as part of the Town’s FY19 Community Wide Assessment Grant. This grant will drastically help promote clean up and redevelopment of the site to a community needed venue for agricultural/food hub use, indoor/outdoor farmer’s market space, indoor/outdoor dining, and amenities that would lend the property for both recreation, affordable senior housing and care center, and entertainment uses. To complete redevelopment, **Stafford will solicit private investment from the Stafford Housing Authority and prospective developers through Request of Proposals.** Stafford will also leverage additional funding from **Tax Increment Financing program.** Acquiring a clean-up grant will provide a catalyst for potential developers. **EPA Brownfields Revolving Loan Funds (RLF)** available from the Capitol Region Council of Governments in CT would allow the cleanup to move forward if additional resources are needed.

**1.c.ii. Use of Existing Infrastructure** - Existing infrastructure available at the Site includes electricity, high speed internet, and municipal water and sewage, and have the capacity to handle expansion associated with the proposed redevelopment. The surrounding area of the building includes a completely paved parking lot, and accessible roads with streetlights. The structure of the building is in good condition such that after the abatement of HBM, the proposed redevelopment of the site can be supported. This grant will help facilitate the reuse of the existing infrastructure. The parking lot area is large enough to fit stands and tents in front of the former school structure which can be used for entertainment that will attract more residents and even visitors from towns over.

## **2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT**

### **2.a. Community Need**

**2.a.i. The Community’s Need for Funding** - Stafford’s small, rural character lends to its beauty, however, it limits its capacity and resources to fund brownfields remediation. This is reflected in the **Municipal Grand List per Capita, which is only 65% of the State Average,** and the **municipal debt per capita, which is 108% of the state average.**<sup>1</sup> Our community’s population is decreasing; since 2010, there has been a **5.1% decrease in Stafford’s population, further reducing the tax base and town revenue (2021 Equity Profile).** Stafford has an average mill rate of **34.95, which** means that the real estate tax revenue is moderate and barely sufficient to cover the municipal budget for essential services. **The median household income is \$74,386, which is below the state average.** Stafford particularly struggles with pockets of poverty in the Target Area where **27% of households were below the poverty level, compared to 6% average across the town, and 10% average across the state.**<sup>2</sup> **The Target Area has also suffered from persistently higher unemployment rates, averaging 12%,**

<sup>1</sup> Ctdata.org

<sup>2</sup> 2014-2018 ACS, EJSscreen

**compared to 5% across Tolland County in the same period 2014-2018.** This is linked to the low number of jobs in the vicinity (~3,000), requiring reliable transportation and significant travel times for most residents (median ~30 minutes), and disproportionately impacting poorer people with limited mobility. 6% percent of households in Stafford do not have a vehicle<sup>3</sup> and thus limited access to jobs and resources. Overall, the Town of Stafford is focusing its limited resources to provide basic services to its constituents, who have been plagued by years of economic stagnation and further hurt by the COVID-19 pandemic. Investment in the community through cleaning up of brownfields such as the Witt School is crucial to support economic growth, revitalization and maintain the character of the region. Furthermore, in 2012, a leak from a 10,000-gallon underground storage tank (UST) occurred at the Witt School, impacting soil and surface water of the nearby pond. The town had to fully cover the expense of the emergency cleanup at a cost over \$50,000, increasing the financial burden on its residents.

### **2.a.ii. Threats to Sensitive Populations**

**(1) Health of Welfare of Sensitive Populations** - Stafford has an aging population, especially in the Target Area. 22% percent of the population is over age 64, placing it in the 80<sup>th</sup> percentile nationally according to EJSCREEN.<sup>2</sup> Low-income population is 33% of the population, which is at the 75<sup>th</sup> percentile in the state and region, and the 57<sup>th</sup> percentile nationally. 16% have less than high school education (80<sup>th</sup> percentile in state and region, 70<sup>th</sup> nationally), which implies limited opportunities to improve their economic status through higher paying jobs. Sensitive populations also include children, women of child-bearing age, and the Veteran population of around 800 which makes up for about 6.75% of Stafford<sup>3</sup>, among the highest in the state.

These groups, living in the more densely populated Target Area of Stafford, are disproportionately impacted by blight and contamination associated with the presence of brownfields. Vandalism and crime are often related to dilapidated properties and Stafford has a higher crime rate compared to surrounding Tolland County; robbery rate is more than double (16.8 vs. 7.3 per 100,000 in the county) and assault rates ~50% higher (311 compared to 224 per 100K).<sup>3</sup> Mental health conditions such as depression were reported at 15% compared to 9% average in the state in the period 2015-2018, and the pandemic has only exacerbated these conditions, and the need of for support from social and town services. Removal of blight at the Witt School and creation of a community hub to revitalize the neighborhood will provide significant support for these sensitive populations.

**(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions** - Although Stafford is a rural community away from urban centers, the population in the Target Area suffers from disproportionately high incidences of diseases. According to the CT Department of Public Health, the Target Area census tract had one of the highest asthma-hospitalizations rates in Tolland County<sup>4</sup>. 49% of households in Stafford are living in structures built before 1960, compared to the Connecticut average of 42% (Census Bureau ACS 2019). This means there is a higher percentage of people in Stafford who are at risk of being exposed to lead paint and other HBM. In 2016, 5.4% of screened children had lead blood levels exceeding 5 µg/L and an additional 1.6% exceeding 10 µg/L. The lead paint indicator in Stafford is at 81<sup>st</sup> national percentile according to EJSCREEN. Stafford's population also has a high blood pressure rate of 28-31%, among the highest rates in Tolland County. In addition, Stafford residents report a higher incidence of smoking (19%) than the average in Connecticut (14%)<sup>5</sup>. Combined with the low income and the location of the Target Area in a USDA-designated food desert<sup>6</sup>, these health problems are amplified by the presence of numerous brownfields in the community that increase exposure to hazardous materials such as VOCs (liver, kidney, nervous system; birth defects; cancer); HEAVY METALS (immune, cardiovascular, developmental, neurological, reproductive, respiratory, kidney; cancer); PETROLEUM (nervous system, immune, liver, kidney, respiratory; cancer), PAHs

<sup>3</sup> DataHaven, 2021 Equity Profile

<sup>4</sup> DPH Asthma Surveillance Program

<sup>5</sup> DataHaven, 2021 Equity Profile

<sup>6</sup> USDA Food Access Research Atlas

(liver; cancer) and high prenatal exposure to PAHs is associated with cognitive disfunction, childhood asthma and other birth defects; and HBM including asbestos (lung scarring, mesothelioma and lung cancer). The conversion of the Witt School into the proposed mixed-use project will stimulate investment in the community, including lead abatement by landlords and other property owners, reduce exposure to contaminants, decrease rates of disease and adverse health conditions, and be a source of nutritious food for area residents.

**(3) Promoting Environmental Justice** - In addition to its location with a high prevalence of low income and aging population, the Site is also just a 1/4 mile outside of a CT-designated EJ community (#8901001), with a population of 1,988 people where 34% of the population is below 200% of the federal poverty line. The same area has several EJ indices exceeding the 50<sup>th</sup> percentile in the state and region (PM 2.5, Ozone, Diesel PM, Air Toxics, RMP proximity), in addition to the lead paint indicator that is at the 81<sup>st</sup> percentile nationally and the Wastewater Discharge Indicator at the 70<sup>th</sup> percentile nationally. Blight and exposure to additional contamination further adds to the burden faced by these sensitive populations. Remediation of the Site would reduce exposure to lead paint and other hazardous building materials. In addition, the site's reuse will provide citizens with access to locally sourced, healthy food, and contribute to the health, welfare and economic vitality of the Target Area and entire Stafford community.

**2.b. Community Engagement**

**2.b.i/ii Project Involvement/Project Roles** - There are many local organizations/groups that will be relevant to this project. Since Stafford is not a large town, the opinions of residents will be prioritized in the planning and redevelopment process. There are a few main partners that will be key throughout this project, including:

Partner Name	Point of Contact (name, email & phone)	Specific role in the project
Stafford Housing Authority	Ann Marie Perrone aperrone@staffordha.com (860) 684-4973	Partner to support the redevelopment and perhaps help with leveraging resources.
Agriculture Advisory Commission	Dr. David Mordasky dmmordaskydv@gmail.com (860) 729-7921	Participation in reuse planning, and communication throughout the remediation process.
Economic Development Commission	John Wittenzellner jwittenzellner@utilitygroupinc.com (860) 721-0243	Lead community involvement and solicitation of resident input. Participation and input in reuse planning
North Central District Health Department	Westford Lirot, B.S. R.S. wlirot@ncdhd.org (860) 684-5609	Assistance with health risk communication with public
Historic Advisory Commission	Leonard Clark lvclarkey@cox.net (860) 684-3246	Advisement of historical resources/preservation, regulatory review
Stafford Community Center	Grace Parrow parrowg@staffordct.org (860) 684-3906	Assistance with community engagement, venue for meetings.

In order for any redevelopment plans to truly have a positive impact for the town, the neighborhood residents must be informed, involved, and represented during the whole process. *The town is equipped with many strategies for community involvement; with a primary focus on disseminating project-related communications*

*and hosting open town meetings at the Stafford Community Center*, a centralized location. To help create a vision and development that promotes cohesive excitement, Stafford will solicit professional facilitation services, from organizations like the Connecticut Economic Recourse Center. Working with Stafford-based groups identified above, as well as the Board of Finance and Planning and Zoning Commission, Stafford will further ensure meaningful and wide-spread involvement of local leaders, residents, staff, and stakeholders.

**2.b.iii Incorporating Community Input** - The voice and opinions of the Stafford community are essential towards the development and future of the Site. The Stafford Brownfields Initiative has been created to emphasize the town's goals of returning underutilized properties towards productive reuse, as well as protecting human and environmental health, and spur job growth. The Brownfields Initiative website [www.brownfieldsstaffordct.com](http://www.brownfieldsstaffordct.com) has been created to allow the community to learn about the goals of the program and the current progress and vision for brownfield sites in the area, but it also provides the opportunity to engage and solicit feedback and input from the community. By participating in efforts such as surveys and joining in on virtual public presentations, the residents and stakeholders are given a chance to learn about local development plans, give their feedback, and discuss the subject with leaders of the town. Members may also sign up for social media and/or email updates on grant related brownfield activities, which contain a summary of completed and planned site activities, as well as any news on future community meetings. For members who do not have access to the internet, transportation or are occupied in the workforce or with children, the town may deliver fliers to these local residents, including the senior population, with information on contacting the town hall if they have questions or concerns. Public meetings and visioning sessions will be held to receive input on the projected use of the Witt School and to inform and finalize plans for development; these will be broadcast remotely to accommodate social distancing for vulnerable citizens. In addition, an Information Repository at Town Hall, located in the Target Area, will serve as the location for hard copies of all program-related documents for review by the public.

### 3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

**3a. Proposed Cleanup Plan** - The Site is not suitable for redevelopment and reuse without the removal of asbestos-containing materials (ACM), various PCB-containing hazardous building materials (HBM), and lead-painted surfaces of the building. The proposed cleanup plan is to remove / abate ACM, PCB and lead impacted HBM. Abatement of contaminated building materials will be conducted by a competitively procured, appropriately licensed remedial contractor pursuant to CT Remediation Standard Regulations (RSRs) adopted by the Commissioner pursuant to section 22a-133k of the Regulations of Connecticut State Agencies (RCSA). Licensed off-Site disposal of contaminated media will be conducted pursuant to the aforementioned regulations and the Connecticut Hazardous Waste Management Regulations [22a-446d]. Additional applicable local, state and federal regulatory requirements will also be adhered to. Asbestos abatement actions will require notification to and coordination with the Connecticut Department of Public Health (CT DPH) and will be conducted in accordance with CT DPH rules and regulations. This cleanup plan effectively removes the contaminant exposure pathways at the facility and allows for the beneficial reuse of a cherished community building that currently lies vacant and deteriorating. The cleanup plan will invigorate the local economy, provide near-term and long-term employment and affordable senior housing opportunities, and provide much needed access to fresh produce in the USDA designated food desert Target Area and local community.

#### 3b. Description of Tasks/Activities and Outputs

##### i. Project Implementation / ii Anticipated Project Schedule / iii. Task Activity Lead / iv. Outputs

TASK #1 - COOPERATIVE AGREEMENT (C.A.) OVERSIGHT
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**EPA-funded activities:** Management and execution of C.A. oversight : EPA Reporting (ACRES, MBE/WBE, FFR and Quarterly Reports, Close Out); procurement and management of a qualified environmental professional (QEP); maintaining financial records and completing drawdowns; maintaining project files and information repository; project coordination with stakeholders; Site Eligibility Determination Forms; compliance with Section 106 Historic Preservation Act, as applicable; quarterly Steering Committee meetings, ensuring the program remains on schedule/budget. Travel and attend National Brownfields Conference.

**Non-EPA grant resources needed to carry out task:** Town will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted.

**Anticipated Project Schedule:** Town will competitively procure QEP by 12/31/22. Kick off program January 2023. Quarterly Reports submitted within 30 days after the end of each reporting period (Jan / April / July / Oct). Annual FFR and M/W/DBE reports submitted by October 30 of each grant year. ACRES updated when cleanup is started, at a minimum of quarterly intervals, and other major project milestones. Quarterly Steering Committee meetings. Final Closeout report submitted within 90 days of the end of cooperative agreement.

**Task/Activity Lead(s):** Town will lead this task in coordination with and assistance from the QEP, who will provide technical and programmatic assistance, including eligibility forms, QRs, ACRES, etc.

**Output(s):** EPA Reporting (ACRES, 3 annual FFR & M/W/DBE reports, 12 QRs, Closeout Report, etc.), RFQ for QEP, procure QEP, grant drawdown requests, 12 Steering Committee Meetings, general C.A. oversight and management and attendance at National Brownfields Conference.

### TASK #2 - COMMUNITY OUTREACH & ENGAGEMENT

**EPA-funded activities:** Town will lead efforts to inform and engage the Target Area and local community throughout project implementation. Outreach materials will be posted on the Town's website and social media platforms. The QEP will prepare a community relations plan (CRP) in collaboration with the Town which will detail the steps ensuring adequate public notice and opportunity to comment on key plans and documents. An administrative record will be established and also posted to the Town's website. Notice of the updated ABCA and CRP will be presented at a public meeting, published with a 30-day comment period for community stakeholders to respond. Written responses to public comment will be incorporated into the administrative record. The Town anticipates completing a minimum of three (3) public meetings.

**Non-EPA grant resources needed to carry out task:** Town will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted.

**Anticipated Project Schedule:** Community Outreach activities are expected to commence Winter/Spring 2023 and occur over the lifetime of the grant. Town anticipates completing a minimum of three (3) public meetings to occur at key project stages: *Spring 2023* (presentation of CRP/ABCA), *Fall/Winter 2023* (pre-cleanup / reuse planning); and *Fall / Winter 2024* (post - cleanup).

**Task/Activity Lead(s):** Town will lead community engagement activities. QEP will be the Town's partner and will provide technical documents, support and expertise and other community outreach assistance.

**Output(s):** Community Relations Plan (CRP), draft ABCA, outreach materials, website/social media updates, public notices, meeting presentation materials, administrative record and coordination with project partners and stakeholders. A minimum of three (3) public meetings. Engage Target Community and general public.

### TASK #3- SITE SPECIFIC CLEANUP ACTIVITIES

**EPA-funded activities:** The QEP will prepare key documents in preparation for cleanup implementation, including the final ABCA/cleanup plan, Health and Safety Plan (HASP), QAPP, and notification and coordination with CT DPH. The QEP will prepare plans and specifications that the Town will use to put the remediation project out to public bid in order to competitive procurement a cleanup contractor. The QEP will provide bid support during the competitive procurement process. When selected, the contractor will implement the specified cleanup tasks with oversight from the QEP. The QEP will conduct oversight of cleanup activities.



<p><b>Non-EPA grant resources needed to carry out task:</b> Town will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted.</p>
<p><b>Anticipated Project Schedule:</b> <i>Spring/Summer 2023:</i> Complete QAPP, HASP, final ABCA and notification. <i>Winter 2023:</i> complete cleanup plans and specifications, issue invitation for bids for cleanup contractor. <i>Spring 2024:</i> procure cleanup contractor. <b>Summer 2024:</b> Commence cleanup / abatement activities. <i>Fall 2024:</i> Complete removal / abatement of ACM, PCB and lead impacted HBM at Site.</p>
<p><b>Task/Activity Lead:</b> The Town will lead procurement of the cleanup contractor with QEP support. The QEP will generate all cleanup planning documents. The procured licensed cleanup contractor will implement the specified cleanup tasks with QEP support and oversight.</p>
<p><b>Output(s):</b> Final ABCA, HASP, QAPP, plans and bid specifications, FRP for environmental contractor, completion of remedial activities and site ready for reuse.</p>
<p><b>TASK #4 - CLEANUP OVERSIGHT</b></p>
<p><b>EPA-funded activities:</b> During remedial activities, the QEP will perform oversight activities to ensure remedial actions are completed in accordance with the EPA approved ABCA / cleanup plans and meet applicable statewide standards and requirements. The QEP will conduct confirmatory sampling to document post-remedial conditions. QEP will document activities in the <b>Cleanup Completion and Closure Report</b>.</p>
<p><b>Non-EPA grant resources needed to carry out task:</b> Town will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted.</p>
<p><b>Anticipated Project Schedule:</b> Commence <b>Summer 2024</b>. Cleanup activities and oversight are expected to occur through Fall 2024. Final Cleanup Completion report are anticipated in Winter 2024. Town is confident all work can be completed within 3 years.</p>
<p><b>Task/Activity Lead(s):</b> The QEP will provide oversight of site cleanup activities to document compliance with applicable state and federal requirements.</p>
<p><b>Output(s):</b> Cleanup Completion and Closure Report. Site ready for reuse.</p>

**3c. Cost Estimates**

**3.c.i. Development of Cost Estimate/c.ii Application of Cost Estimates/c.iii Cost Share** – The Town seeks \$650,000 in cleanup funding. The estimates below were developed in consultation with the *EPA Interim General Budget Development Guidance for Applicants and Recipients of EPA Financial Assistance guidelines*, the April 2021 HBM Assessment conducted under the Town’s Community Wide Assessment Grant and input from environmental professionals, and other related experience. **Note no equipment or supply costs are requested:**

**Task 1:** Personnel = \$3,500 (70hrs x \$50/hr); Brownfield Conference – 2 attendees (travel, lodging, per diem @ \$1,500pp) = \$3,000; Contractual - General Oversight Assistance, Quarterly Reports (12) and ACRES updates = \$7,000 (70hrs @ \$100/hr average). **Task 2:** Personnel = \$3,500 (70hrs x \$50/hr); Contractual = \$8,000 [(-\$1,500/mtg x 3 public meetings) = \$4,500) + \$3,500 for CRP, draft ABCA and production of technical and/or outreach materials (35 hrs @ \$100/hr average)]. **Task 3:** Contractual: \$542,500 [QEP = \$27,500 (275 hrs @ \$100/hr average for: Final ABCA; QAPP; and technical plans and specifications) + HBM Remediation Contractor \$515,000 {(35,000sf impacted plaster x \$10/sf = \$350,000) + (11,940sf of impacted tiles x \$4/sf = \$47,600) + (45 window glazing x \$350/ea = \$15,750) + (3,357sf insulation x \$30/sf = \$100,710) + (100lf mastic x \$7.8/lf = \$780)}]. **Task 4:** Contractual = Cleanup/Completion Reports = \$82,500. [QEP = \$82,500 (825 hrs @ \$100/hr average) for remediation oversight services (~425hrs) and regulatory cleanup and completion reporting (~400hrs) related activities]. **Cost Share** – The Town will provide \$130,000 in cash contributions of municipal funds towards cleanup activities.

	<b>Task 1 Cooperative Agreement Oversight</b>	<b>Task 2 Community Outreach &amp; Engagement</b>	<b>Task 3 Site Specific Cleanup Activities</b>	<b>Task 4 Site Cleanup Oversight &amp; Cleanup Completion Reports</b>	<b>Total</b>
<b>Personnel</b>	\$3,500	\$3,500	\$ -	\$ -	<b>\$7,000</b>
<b>Fringe</b>	\$ -	\$ -	\$ -	\$ -	<b>\$ -</b>
<b>Travel</b>	\$3,000	\$ -	\$ -	\$ -	<b>\$3,000</b>
<b>Contractual</b>	\$7,000	\$8,000	\$542,500	\$82,500	<b>\$640,000</b>
<b>Total Direct Costs</b>	<b>\$13,500</b>	<b>\$11,500</b>	<b>\$542,500</b>	<b>\$82,500</b>	<b>\$650,000</b>
<b>Indirect Costs</b>	\$0	\$0	\$0	\$0	<b>\$0</b>
<b>Total Fed. Funding</b>	<b>\$13,500</b>	<b>\$11,500</b>	<b>\$542,500</b>	<b>\$82,500</b>	<b>\$650,000</b>
<b>Cost Share</b>	\$ -	\$ -	\$130,000	\$ -	<b>\$130,000</b>
<b>Total Budget</b>	<b>\$13,500</b>	<b>\$11,500</b>	<b>\$ 672,500</b>	<b>\$ 82,500</b>	<b>\$780,000</b>

**3d. Measuring Environmental Results**

The Town will track, measure, and report project performance through its quarterly reports, ACRES database, and website. Quarterly reports and internal project management tools will be used to ensure funds are expended appropriately in a timely and efficient manner within 3 years, including the tracking of DBE expenditures. Data will be regularly entered into ACRES, including long-term outcomes such as the number of jobs created, funding leveraged through the economic reuse of sites; the number of acres made ready for reuse; the number of affordable senior housing units created; and the minimized exposure to hazardous substances contamination. An established EPA approved work plan will guide project results and progress will be evaluated based upon major project milestones and anticipated project goals such as the volume of HBM abated/mediated. This process has been followed in the past for other grants and has been both successful and effective. If the project is not on schedule, the issue will be documented in the quarterly report and a corrective action plan will be implemented immediately.

**4. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS**

**a. Programmatic Capability – i. Organizational Structure / ii. Description of Key Staff**

The Town of Stafford is comprised of approximately 85 employees with diverse and comprehensive professional expertise with a proven ability to effectively manage grant funds and collaborative programming. The Town utilizes an interdepartmental approach to administer projects of this type and scope, leveraging its unique combination of in-house finance, development, environmental, capital project expertise. To guide project results, staff will implement an EPA-approved detailed work plan to establish clear milestones, key personnel, and responsibilities. To ensure that the project is on schedule and budget, status updates will be incorporated into the Town's current reporting structure. The Town will co-manage the EPA Cleanup Grant through the Office of the First Selectman, Building, Zoning & Land Use Office, Treasurer's Office, and Grants & Marketing Office:

The Grants & Marketing Specialist, Amber Wakley, will serve as the Project Manager and have direct oversight of the program. She has a proven ability to effectively manage and administer state and federal grant programs, including the FY19 EPA Brownfields Assessment Grant. Amber maintains and tracks grant requests and reporting, and is responsible for helping develop the Town's economic development and community engagement activities. Additionally, she maintains strong relationships with residents, town boards and commissions, and property owners. Understanding the complexities of the project, the Town has developed a diverse team for active oversight. Dave Perkins, the Land-use Technician and Code Enforcement Officer, has over 40 years of experience in land use matters and geographical information systems. He staffs the Planning and

Zoning Commission, Inland Wetlands Commission, and the ZBA. He has been actively involved in implementing the current FY19 EPA Brownfield Town-wide Assessment Grant. Besides being a licensed Connecticut building official for over 19 years, the Town's Building Official, **Glen Setzler**, offers extensive professional and practical expertise. Glenn has worked in mid-sized architectural firms for over 20 years. He has an in-depth understanding of state building and fire codes, excellent project management skills, and experience with all phases of construction. Accomplishments include the Dutch Point Redevelopment project in Hartford valued at approximately \$73M. As the Director of Public Works, **Devin Cowperthwaite**, is responsible for the management of the Highway Department, Parks Department, and Transfer Station. He oversees a \$2.43M annual municipal budget and administers local, state, and federal funds, including LOTCIP, LOCIP, State Local Bridge Program, and Federal Bridge Program grant funding. The Town's Chief Financial Officer, **Lisa Baxter**, Chief Financial Officer - will be responsible for accounting practices to ensure compliance, and that funds are expended and drawn down in a timely and efficient manner. She has a working knowledge of reporting and financial procedures for state and federal grant processes.

**4.a.iii. Acquiring Additional Resources** - The Town of Stafford is committing its resources and personnel and will augment in-house capabilities with additional expertise solicited through an RFP, a regular practice for many projects and/or products. Stafford will hire a (Qualified Environmental Professional) QEP / CTDEP approved Licensed Environmental Professional (LEP) to generate required cleanup plans and oversee remedial actions. Bid Requests and RFPs will be published in local newspapers in compliance with local, state, and federal laws. The Town has policies and procedures in place for the competitive and equitable procurement of any additional scientific, engineering, legal or construction support that may be needed. The Town will ultimately select the winning proposal(s) and execute the pertinent contracts with the selected remedial contractor. The Town also maintains an active partnership with the Connecticut Brownfields Initiative Municipal Assistance Program through the University of Connecticut and will seek programmatic support and advice from EPA Region 1 Connecticut Office of Brownfield Remediation and Development. The Town works in conjunction with the Stafford Brownfields Advisory Committee, and project partners from the Board of Finance, Economic Development Commission, Agriculture Advisory Committee, Historic Advisory Committee, and Planning and Zoning Commission, among others.

#### **4.b. Past Performance and Accomplishments**

##### **4.b.i Currently Has or Previously Received an EPA Brownfields Grant**

(1) **Accomplishments** - The Town of Stafford received a \$300,000 FY19 EPA Brownfields Community-wide Assessment Grant and is currently facilitating the grant, **Period of Performance: 10/1/2019 - 9/30/2022**. These funds have allowed the Town to develop a prioritized inventory of brownfield properties, a brownfield steering committee – comprised of project partners, staff, stakeholders, residents, and civic leaders – establish needs, prioritize sites and communicate progress. These funds are allowing us to identify and quantify the contaminants that exist within these brownfield sites so that they can eventually be remediated and redeveloped with additional leveraged funding. Outputs include: site inventory of over eleven priority Brownfields sites in the Target Areas, 4 Phase I Environmental Site Assessments (ESAs), 1 HBM Assessment, 1 Phase II ESA (commencing fall 2021), 1 ABCA, 2 QAPPs, Cleanup and Reuse Planning Activities for the Witt School, 2 public meetings, digital and outreach materials, Brownfield Advisory Committee meetings, and a series of public outreach surveys. Stafford attended the 2019 National Brownfields Conference. The project is currently on schedule and there have not been compliance issues with the terms and conditions of the grant agreement. ACRES and MBE/WBE reporting is up to date.

(2) **Compliance with Grant Requirements** - Overall the program is on budget and schedule following an initial delay due to the COVID-19 pandemic. The Brownfields Business Development Public Outreach event that

was scheduled for March 25, 2020, and subsequent steering committee meetings, were postponed due State restrictions on gatherings and pandemic-related interferences. On December 15, 2020, a virtual public meeting was held in conjunction with the Town of Stafford Selectmen meeting. A Brownfields program overview was given and conceptual redevelopment scenarios for the Witt School were presented, and feedback was solicited from the community. Local residents and stakeholders were provided the opportunity to ask questions and give input into site assessment selection and proposed redevelopment options for the Witt School. Public comments were collected, and a community survey was introduced. The public was also directed to the Town's social media outreach (website and Facebook) for project updates and a site nomination form. Steering committee communications resumed virtually. There were also COVID-19 delays associated with the inability to conduct file reviews at CTDEEP offices, etc. In the interim, the Town worked with the private property owners to obtain formal access agreements. In addition, the Town, EPA, and the QEP met with potential purchasers/redevelopers on March 5, 2020; and had a follow-up conference call with the owner of the property on April 1, 2020. Delays and corrective measures were noted in ACRES reporting. The remaining assessment grant funds equal \$155,4031.10, are earmarked for remaining tasks, and will be expended in accordance with the period of performance.

DRAFT

**DRAFT Analysis of Brownfields Cleanup Alternatives (ABCA)**  
**Former Earl M. Witt School**  
**20 Hyde Park Road**  
**Stafford, Connecticut**

**I. Introduction & Background**

This Draft Analysis of Brownfields Cleanup Alternatives (ABCA) has been prepared to evaluate cleanup alternatives for the former Earl M. Witt School building, located at 20 Hyde Park Road in Stafford, Connecticut. The ABCA is a condition of the Town of Stafford's application for a United States Environmental Protection Agency (EPA) Site-Specific Brownfields Cleanup Grant.

As identified in the Town of Stafford's EPA Brownfields Assessment Grant application, the former school building's ultimate reuse is an essential part of the downtown's revitalization. While the former Witt School no longer serves a productive purpose as an educational facility, the building's reactivation - envisioned with new market-viable uses - will help to activate Hyde Park and generate economic benefits that extend well beyond the property itself.

**1. Site Location**

The Site consist of two adjoining parcels of land located at 20 Hyde Park Road and 21 Hyde Park Road in Stafford, Connecticut. The approximate 9-acre, 20 Hyde Park Road property (Parcel ID: 70-82) is currently improved with a vacant, two-story plus basement, approximate 20,200 square-foot, brick, former school building. The majority of the building is slab-on-grade with portions below grade. The building was reportedly originally constructed in 1939 with additions in 1953 and 1991.

The remainder of this parcel also contains tennis courts and ballfields. The Town currently uses this land for Town functions such as concerts and festivals including the construction of amphitheater sometime after 2012. The 148-acre, 21 Hyde Park Road property (Parcel ID: 67-12) consist of a separated 4,700 square foot building constructed in 1900, a small pond known as the "Hyde Park Duck Pond" with an adjacent asphalt paved parking lot, and undeveloped woodlands.

**2. Forecasted Climate Conditions**

EPA requires that the ABCA consider potential impacts due to climate concerns. Specifically, this discussion addresses observed and forecasted climate change conditions for the area of the project and associated site-specific risk factors. Stafford, Connecticut is located approximately 30 miles northeast of Hartford. Stafford is located within 70 miles of the Atlantic coast and portions of the Town are located along tributaries to the Willimantic River.

The northeastern United States, including Stafford, includes warm and often humid summers and cold winters. Rainfall can be severe with summer thunderstorms common and severe weather resulting from regional nor'easter anticyclone storms and/or hurricanes. Winter conditions can also be severe

with ice storms and heavy snow common. Snowfalls of 2-3 feet in one event are not uncommon. Portions of the Town of Stafford located near rivers/streams are within the 100-year flood plain; however, due to its location and elevation, the Site is currently located in a Zone B flood plain (areas between limits of 100-year flood and 500-year flood).

According to the US Global Change Research Program website (<http://www.globalchange.gov/explore/northeast>), as a result of climate change, the northeast region can expect increased temperatures and temperature variability and extreme precipitation events. The website states that "Heat waves, coastal flooding, and river flooding will pose a growing challenge to the region's environmental, social, and economic systems. This will increase the vulnerability of the region's residents, especially its most disadvantaged populations. Infrastructure will be increasingly compromised by climate-related hazards, including sea level rise, coastal flooding, and intense precipitation events."

### 3. Previous Site Use(s) and Any Previous Cleanup / Remediation

According to the Town's Assessor's Department, the property was acquired by the town in 1911 and the building was constructed in 1939; with renovations and/or additions to the structure occurring in 1953 and 1991.

Following construction, the property was used as the Stafford High School until 1968 when another high school was built in Town. This property was then converted into the Stafford Middle School. In 1985, the school was renamed the Earl Witt Intermediate School which remained operational until 2008. The property has been vacant since that time.

In June 2015, an unsecured fill pipe caused heating oil in an underground storage tank (UST) to be displaced by rainwater. The displaced heating oil impacted localized soils and the nearby pond. Fire department used booms to contain the oil on the pond and an environmental contractor (ESI) was contracted to assist with spill containment and cleanup.

ESI removed oil from the pond and the remaining oil and water from the UST into a frac tank for disposal. ESI estimated up to 200-gallons of oil was removed from the pond and UST. ESI subsequently excavated to remove the UST and impacted soils on June 5, 2015. Impacted soils were staged on plastic and stored across the street on the parking lot near the duck pond until the Town could figure out means for paying for the project. According to the Connecticut Department of Energy and Environmental Protection (CTDEEP) field report, ESI also collected confirmatory soil samples from the tank grave. A copy of the formal UST closure documentation report was not available for review at CTDEEP.

## II. Site Assessment Findings

Hazardous Building Materials (HBM) surveys of the Site structure were performed by Brooks Safe and Sound in 1991 and Fuss & O'Neill EnviroScience, LLC (EnviroScience) in 2010. The surveys included sampling of building materials for asbestos-containing materials (ACMs), lead-based paint (LBP), and poly-chlorinated biphenyls (PCBs). Numerous ACMs and LBP building components were noted during the survey. Additionally, window caulking and glazing compounds present at the Site were sampled for PCB content. PCBs were not detected in any of the samples, however some of the

reporting limits were greater than one milligram per kilogram (>1 mg/kg), which are presently considered a regulatory limit, as discussed below.

In the subsequent 10 years following the survey, changes to PCB regulations have been enacted. The CTDEEP now regulates PCBs in concentrations >1 mg/kg in building materials and, despite the not detected sample results obtained previously, the laboratory reporting limits for the samples were 1.7 mg/kg. Per CTDEEP regulation, the samples are considered >1 ppm and thereby regulated by CTDEEP and would require removal of the bulk material and possibly the surrounding substrate. PCB's are also regulated under EPA's PCB regulations found in the Code of Federal Regulations, Chapter 40, Part 761 (40 CFR Part 761).

Weston & Sampson performed a supplemental HBM survey of the Site on behalf of the Town of Stafford Community Development Department (the Town) in December 2020. The HBM assessment and limited sampling of building materials was conducted to identify ACMs, lead paint/coatings, PCBs and other hazardous materials (OHMs) at the Site, as well as to support the property redevelopment and reuse and contribute to the economic revitalization of the surrounding area.

Based on the results of the inspection, sampling, field-screening and laboratory analyses, the majority of contamination at the Site is associated with ACM associated with the above-ground structure. The following is a summary of the HBM survey results:

- ACM has been identified in the building, including floor tiles and mastics, plaster surfaces, various types of thermal system insulation, window glazing and roofing materials/sealants.
- ACM thermal insulation has been identified in above-ground pipes in the buildings. This material appears to have impacted soil in the crawlspace of the basement. The survey did not include an evaluation of underground asbestos cement water/sewer piping, below-grade damp-proofing or underground steam lines that may be present at the Site.
- Various types and colors of suspect PCB materials (i.e., window caulk, window glazing and paint) were identified within the property and a total of 11 samples were collected for PCB analysis. Window glazing compound sampled by Weston & Sampson at the Site was found to contain concentrations above 1 ppm. CTDEEP guidance documents require the removal of PCB containing building materials at concentrations >1 mg/kg (i.e., 1 ppm). The guidance also requires the removal of building substrates in contact with the tested materials if PCB concentrations are >1 mg/kg (i.e., the window sashes and glass in contact with the glazing compound).
- Weston & Sampson collected three (3) air samples to screen indoor air for the presence of PCBs. Indoor air results indicated that sources of PCBs in the building exist and will need to be addressed prior to occupancy to reduce the risk posed to potential future building users.
- While several varied painted surfaces were determined to contain lead, the majority of painted surfaces in the building do not contain lead at levels considered to be hazardous. The Occupational Health and Safety Administration (OSHA) Lead in Construction Standard 29 CFR 1926.62 considers any detectable level of lead to be a potential for exposure if dust is generated from disturbances of surfaces coated with paint containing lead.

- Fluorescent light ballasts and bulbs, Other Hazardous Materials (OHMs) that will require special handling and disposal prior to building renovation / demolition activities were identified throughout the building. These materials do not necessarily represent a hazard but cannot be disposed of in a regular landfill.

### III. Project Goal

Stafford's overarching goals are to preserve the attractiveness of the community, increase growth of employment and tax base, and improve the overall quality of life of its residents. **According to the 2012 Plan of Conservation and Development (POCD), commercial development is encouraged in the downtown where many underutilized buildings are present.**

As part of Stafford's Brownfields Initiative, the Town has an active community survey garnering more than 300 responses that provide feedback on community development needs and ideas for redevelopment uses of the former Witt School. The town also issued a Request for Interest, Ideas, and Innovation to prospective developers as preparation for Request for Proposals. **The most favored redevelopment scenarios derived from community input included improving access to food, public recreational amenities, and affordable senior housing.** The project, a mixed-use, the mixed-income building utilizes the bottom floors to create a permanent farmers/cooperative market, including a farm-to-table dining experience. The vision appeals to Stafford's rich agricultural heritage and robust farming community, while generating a hub for social activity to promote economic growth. **Given that the Target Area is a USDA-designated food desert, the suggested reuse would ameliorate the desert conditions by providing access to affordable and nutritious food.** The proposed mixed-use space retains the existing gymnasium and kitchen, developing space for much-needed recreation and entertainment opportunities while providing a legal space for farmers and entrepreneurs to pursue certified food ventures. In addition, and partnership with the Stafford Housing Authority, the upper floor would be converted into affordable senior housing with an adult day care center. Up to 25 units of affordable housing for seniors is envisioned, with shared access to the gymnasium and kitchen to augment activities for the adult day care center.

**Since the Site is currently located in a flood plain, the suggested redevelopment will align with the allowable land-uses for the area.** Stafford is a small town that takes pride in agricultural history yet lacks an outlet to express that passion and pride. This development allows for the high utility parking lot, which is attached to the Witt School, to stay intact for other uses within the park. The intended mixed-use facility also offers the opportunity for a minimalistic redevelopment plan, which would be cost-effective. An enhanced facility will breathe new life into the former Witt School while bridging access to healthy food, affordable housing, and recreation amenities. The project encourages entrepreneurship, sustainability and will significantly enhance the quality of life in Stafford.

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#### IV. Applicable Regulations and Cleanup Standards

##### 1. Cleanup Oversight Responsibility

The Town of Stafford, as the current property owner, will undertake responsibility to remediate contaminated building materials prior to building renovation. Abatement and monitoring of hazardous building materials will be conducted under state certified and licensed personnel.

##### 2. Cleanup Standards

The Connecticut Department of Energy and Environmental Protection (CTDEEP) is the state authorities that regulates releases of OHMs and PCBs. While the Connecticut Department of Public Health regulates asbestos containing materials. Reportable releases require response actions under the Connecticut's Remediation Standard Regulations (RSRs) Title 22a-133k. RSR response actions are managed by a Licensed Environmental Professional (LEP), licensed by the State of Connecticut.

The Site is currently not regulated under the RSRs; however, asbestos abatement actions would require notification to and coordination with the Connecticut Department of Public Health (CT DPH). ACM abatement will be in accordance with CT DPH rules and regulations.

##### 3. Laws and Regulations

Abatement of contaminated building materials prior to building renovation and/or demolition must be conducted pursuant to Remediation Standard Regulations (RSRs) adopted by the Commissioner pursuant to Section 22a-133k of the Regulations of Connecticut State Agencies (RCSA). Off-Site disposal of contaminated media will be conducted pursuant to the aforementioned regulations and the Connecticut Hazardous Waste Management Regulations [22a-446d]. Additional applicable local, state and federal regulatory requirements will also be adhered to.

#### V. Evaluation of Cleanup Alternatives

##### 1. Cleanup Up Alternatives Considered

EPA requires that this ABCA includes the evaluation of three (3) remedial alternatives. To address the abatement of hazardous building materials at the Site, the following three (3) alternatives were considered, including:

- Alternative #1: No Action
- Alternative #2: Abatement and Renovation
- Alternative #3: Abatement and Demolition

## 2. Cost Estimate of Cleanup Up Alternatives

To satisfy EPA requirements, the effectiveness, implement ability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

### Effectiveness

- Alternative #1: “No Action” is not effective in controlling or preventing the exposure of potential receptors to contamination at the Site.
- Alternative #2: Abatement and disposal of hazardous building materials is an effective option, since the contaminant source is removed, and redevelopment may be accomplished. This alternative also offers long term sustainability.
- Alternative #3: Abatement, demolition and disposal of hazardous building materials is an effective option since the contaminant source is removed.

### Implementability

- Alternative #1: “No Action” is easy to implement, as no actions will be conducted.
- Alternative #2: Abatement and disposal of hazardous building materials as part of redevelopment is a feasible remedial option, but will require additional design and planning, and is therefore moderately easy to implement.
- Alternative #3: Abatement, demolition and disposal of hazardous building materials is a feasible remedial option since removal of contaminated building materials must be accomplished prior to demolition. However, this option is moderately difficult to implement. This alternative requires coordination to maintain environmental controls (e.g., dust suppression and monitoring) during cleanup and demolition activities and greater short-term disturbance to the community (e.g., trucks transporting waste). For these reasons, this alternative is considered the most difficult to implement with the highest impact (truck traffic) to the neighborhood. Additionally, this alternative does not line up with EPA's green cleanup goals and objectives.

### Cost

- Alternative #1: No Action: There are no costs associated with this alternative; however the building would not be viable for redevelopment until HBM were abated.

- **Alternative #2: Abatement and Renovation:** The approximate cost to perform asbestos abatement at the building due to the redevelopment and construction plans which require disturbance and removal of these materials ranges from approximately \$780,000 to \$925,900.
- **Alternative #3: Abatement and Demolition:** The estimated cost to abate and demolish the Former Witt School ranges from \$1,550,000 to \$1,900,000.

### 3. Recommended Cleanup Up Alternatives

*The recommended cleanup alternative for hazardous building materials is Alternative #2: Abatement and Renovation.* Alternative #1: No Action, cannot be recommended because it does not address Site risk. Alternative #3: Demolition, while effective at remediating hazardous building materials, comes at an implementation cost of approximately 2.75 to 3 times more than the cost of controlling the exposure risks in Alternative #2. Additionally, Alternative #3 will require many more trucks, will increase impacts to the neighborhood, and will produce additional waste that will take up more space in landfills. Alternative #2 is a more sustainable approach more in line with EPA's Clean and Green Cleanup guidelines.

Therefore, Alternative #2: Abatement and Renovation is the most cost effective alternative capable of reducing risk while having the smallest impact on the surrounding community and the environment. For these reasons, the recommended cleanup alternative is Alternative #2: Abatement and Renovation.