

**Narrative Information Sheet
Former Bristol Babcock Demolition
FY24 U.S. EPA Brownfield Cleanup Grant Application**

1. Applicant Identification

The City of Waterbury
235 Grand Street
Waterbury, CT 06702

The City of Waterbury is a General Purpose Unit of Local Government (City) and as such is an organization that is eligible to receive Federal EPA Brownfields Cleanup Funding.

2. Funding Requested

- a. Grant Type: Single Site Cleanup
- b. Federal Funds Requested
\$2,000,000

3. Location

City: Waterbury
County: New Haven
State: Connecticut

4. Property Information

Former Bristol Babcock Facility
40 Bristol Street
Waterbury, CT 06708
Map Block Lot #: 0546-1159-0043

5. Contacts

- a. Project Director
Thomas Hyde, Interim Director
Waterbury Development Corporation
83 Bank Street, 3rd Floor
Waterbury, CT 06702
203-346-2607 ext. 7283
thyde@nvrldconline.org

- b. Chief Executive/Highest Ranking Elected Official
Mayor Neil M. O'Leary
The City of Waterbury
235 Grand Street, 2nd Floor
Waterbury, CT 06702
203-574-6712
noleary@waterburyct.org

6. Population
115,016 (U.S. Census, 2022 Redistricting Data)

7. Other Factors Checklist

Applicants claiming one or more of the other factors below must provide a summary in the Narrative on the applicable other factor(s). Please identify which of the below items apply to your community/proposed project by noting the corresponding Narrative page number. **If none of the Other Factors apply to your community/proposed project, please provide a statement to that effect.**

Other Factors	Page #
Community Population is 10,000 or less	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed brownfield site(s) is impacted by mine-scarred land	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
The proposed site(s) is adjacent to a body of water (i.e., the border of the proposed site(s) is contiguous or partially contiguous to the body of water, or would be contiguous or partially contiguous with a body of water but for a street, road, or other public thoroughfare separating them).	1
The proposed site(s) is in a federally designated flood plain.	
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	5
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	5
The reuse strategy or project reuse of the proposed site(s) considers climate adaptation and/or mitigation measures.	
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	

8. Letter from the State or Tribal Environmental Authority:
Please see the attached letter from Connecticut DEEP

9. Releasing Copies of Applications
N/A

EPA Cleanup Proposal Narrative

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

i. Overview of Brownfield Challenges and Description of Target Area

The City of Waterbury (population 115,016) is located in west-central Connecticut at the heart of a 19-town area known as the Central Naugatuck Valley Region. Waterbury is conveniently located at the crossroads of two major expressways, Interstate 84 and Connecticut Route 8. The city is home to a passenger rail station and a bus terminal. Waterbury ranks #8 on the State's list of Distressed Municipalities, an Opportunity Alliance District, and an Environmental Justice community.

The city has a vibrant industrial and manufacturing history, and was known as the “brass capital of the world” for almost 100 years. When the American brass industry fell in the 1970s, the city faced challenges due to the successive economic downturn. The fall of an industry left behind contaminated, vacant, and blighted brownfield sites. As of 2019, the city had completed the remediation of 178.24 acres of former brownfield sites, with 140.21 acres of brownfields remaining and the potential to bring these sites back to productive re-use.

The Former Bristol Babcock Facility (circa 1889 to 1989) consists of 6.6-acres consisting of four interconnected buildings having been constructed in 1895, 1915, 1942, and 1954, bordering Waterbury and Naugatuck (Census Tract 3519). The interconnected buildings on this site exceeds CT RSRs. Over 10 REC's were identified within the building, including PCBs, asbestos, lead-based paint, mercury, and lead (among other contaminants). CTDEEP and CT DPH requires the hazardous building materials to be abated and demolished under an alternative work practice to ensure protect human health exposure to hazardous materials. No abatement activities have taken place on this site from 2018 to present.

Ultimately, this EPA funding will enable the city to remove this derelict building that has continuously deteriorated since the 1980s. The site poses an imminent danger to Waterbury's residents per the City's Building Inspector General (2017). Various community stakeholders are well supportive of the demolition of this eyesore; EPA Region 1, CT DEEP, CT DPH, and the city are well aware and engaged in efforts remove the building, indicative of correspondence records and oversight of this building between these state and federal agencies. As such, the City is working diligently to achieve the desired outcome of redevelopment, indicative of the City's acquisition of this property (and neighboring parcels), enrollment into Connecticut's (DECD) Municipal Brownfield Liability Relief Program, commitment of \$1,00,000 from Bristol Street Enterprise (former property owner), and seeking of \$4,000,000 from CT DECD Brownfield Funding toward demolition. Given this site's size, level of hazardous contamination, and deteriorating state, the culmination of local, state and federal funding is essential to remove the Former Bristol Babcock Facility. EPA Cleanup funding will enable the city to proactively abate, demolish, and dispose of contaminates from the site with the #1 priority of ensuring the surrounding public's health and safety.

Revitalization of the former Bristol-Babcock facility is part of a larger revitalization effort to provide housing opportunities, with the potential of supporting future employees with nearby residential opportunities. Less than 0.5mi away from the Bristol-Babcock is the Waterbury Naugatuck-Industrial Park. Upon completion, Amazon Distribution Facility will move into to the Industrial Park, inviting hundreds of employees to the area and generating an estimated \$5M annually in tax revenue (CBIA 2022). Moreover, future redevelopment will catalyze walkability and non-vehicular transportation access via brownfield redevelopment along the Waterbury Portion of the Naugatuck River (0.5-mi from the project site), bolstering interconnectedness and placemaking between Waterbury neighborhoods, spanning across the border of Naugatuck (adjacent to the Waterbury-Naugatuck Industrial Park) to the City's South End.

ii. Description of the Priority Brownfield Site(s)

40 Bristol Street is on CT DEEP's Brownfield Inventory and is defined as an establishment under the CT DEEP Property Transfer Program since 1986, alongside the PCB Program. This project site housed Bristol Babcock Company, a heavy manufacturing company. The former heavy-industrial complex was known to manufacture steel belt lacing, recording pressure gauges (temperature, pressure, electricity, etc.) along with various metal-based manufacturing mechanisms. Operations ceased at the site in the 1980s, an exemplar of the many outsourced manufacturing facilities in Waterbury during this period of globalization. The site has sat vacant for decades, deteriorating and contaminated with PCBs and asbestos, attributed to the previous historic manufacturing on site. In 1992, EPA's Brownfields Assessment team reported various PCBs were present on site following limited soil testing, in addition to the removal of eight vandalized transformers.

This site has remained an eyesore and public safety hazard to Waterbury residents. In 2015, a massive fire significantly damaged the facility, triggering CT DEEP and CT's DPH involvement. Both state agencies in tandem with the city cite this parcel as a priority for brownfield redevelopment; various areas of standing walls are structurally unsound and contaminated with PCBs and asbestos.

In 2017, the City's Building Inspector determined that the existing structure is in need of immediate demolition in order to protect the general public's health and safety. Emergency demolition of a portion of the site (Building D) was issued in 2017, taken 80ft back from Bristol Street. In 2018, CT DECD awarded \$200,000 to conduct limited structural and environmental assessment within selective areas. Subsurface investigations completed using DECD secured funds attribute the historic manufacturing activities to hazardous building materials, asbestos, and contamination throughout the site. However, such investigation was limited in scope, due to the lack of structural integrity of the building. Complete site characterization is contingent upon demolition of the building as indicated in HRP's Subsurface Investigations. The site contains co-mingled contamination, impacting the site soil, groundwater, sediment, and concrete; over 10 RECs/AOCs were identified and 21 AOCs were identified in this Site's Phase I ESA (2023) (available via SharePoint). Additionally, contamination exceeding CT RSRs are present in Stormwater Drainage Systems, the sites' historic storage areas, and above/below ground storage tanks.

b. Revitalization of the Target Area

i. Reuse Strategy and Alignment with Revitalization Plans

Waterbury is challenged with several critical service gaps relating to housing, with project-area community considered "housing burdened" by the USEPA. The housing cost-burden rates are 43% in Waterbury, compared to 35% in the State of Connecticut (DataHaven). One-fifth of Waterbury's housing units are 'affordable' to households with incomes below the AMI. However, 51% of Waterbury households are cost burdened with 57% consisting of renters (Waterbury Housing Plan, 2022). The city views this site's end use as a future asset to address the need for affordable and market rate housing stock in Waterbury. Potential housing in close proximity to a Waterbury-Naugatuck Industrial Park will incentivize workers to use non-vehicular modes of transportation and support the 17% of the City of Waterbury's residents' households who lack access to a vehicle, compared to 8% of residents at the State level and 8.3% at the Federal level (DataHaven & US Census).

This project will support workforce development initiatives and proximity to transit. The prospective end use of the former Bristol Babcock Facility will support future employees housed at the Naugatuck-Waterbury Industrial Park, soon to be redeveloped into the future Amazon Distribution Facility. This census tract experiencing a negative job growth rate since (ACS 2023). As such, any future residential use of this site will serve the surrounding residents, modernizing this former industrial manufacturing hub to support socioeconomic mobility and employment growth. This site parallels the newly established Waterbury Greenway (component of Phase II of the Regional Naugatuck River Greenway); enabling workers to travel via bike to and from this Site and Waterbury.

ii. Outcomes and Benefits of the Reuse Strategy

The former Bristol Babcock Facility is anticipated to be re-established into mixed-income housing stock, providing housing options for the nearby employment hub, serving a census tract experiencing -0.5% job growth rate over the last year (ACS 2023). Future residential use of this site will serve the surrounding residents, modernizing this former industrial manufacturing hub to support economic mobility and employment growth. This site will bolster positive health outcomes and walkability as the site parallels the newly established Waterbury Greenway (component of Phase II of the Regional Naugatuck River Greenway); enabling workers to travel via bike to and from the site, Waterbury, and the Naugatuck Valley Region.

The Bristol Facility is viewed as a prime locational hub for workforce development opportunities due to its land-size (6.6-acres), proximity to multiple (soon to be acquired) vacant lots neighboring this Site, close access to an entrance ramp on Route 8, lying in route of Waterbury’s Branch Line Transit network, and nearby access to the Naugatuck River Greenway multimodal path (0.1-mi away). The city views this site as a potential hub of innovation, entrepreneurship, and a prime area to create a “...live-work-play neighborhood” (POCD 2015). This site will support major initiatives to address aging infrastructure and secure investment toward abatement of hazardous environmental conditions, and remove blight and unsafe infrastructures, all of which are outlined in the City’s POCD.

The former Bristol Facility holds potential to support Green Energy technologies, with potential to house the solar and geothermal technologies (EPA Re-Powering Map, 2023). The City will consider site’s end use to foster clean-energy deployment, using the City’s contracted Clean Energy Consultant (CSW Energy) to identify feasible implementation of such technologies. The project’s redevelopment plan is contingent upon securing State and Federal funds toward the site’s demolition prior to full site characterization, remediation.

The City is prospectively considering this site’s future redevelopment to support the partnerships currently being established between Northwest Regional Workforce Investment Board (NWIRB) as they submit an EDA Recompete Strategy Grant to facilitate the development of an EV maintenance job training program; Blasius Chevrolet, CT DEEP, CT DECD, Joint Apprenticeship Training Committee (JATC), CT Greenbank and more are committed partners to this anticipated job training program. With EPA funding for this site’s demolition, coupled with prospective EDA strategy and implementation funding for job programmatic strategy/planning, the City/WDC will consider redevelopment of this site to serve as an EV technician training facility, contributing to the State’s target goal to sell only fully-electric vehicles by 2035. The strategic acquisition, remediation, and redevelopment of brownfields addresses the City’s POCD goals 48-1, incorporating green energy initiatives into future infrastructure.

The city will continue to work with the existing residents to consider residential and/or mixed-commercial developments that will best suit the existing community. This demolition project will ultimately progress environmental assessment, site characterization, and cleanup, protecting nearby human health and natural resources from various adverse health risks, while also setting up the site as a potential asset to bolster Waterbury’s resident’s residential options and workforce development.

c. Strategy for Leveraging Resource

i. Resources Needed for Site Characterization

The City/WDC is simultaneously moving quickly toward site acquisition prior to securing federal and state funding sources for demolition and redevelopment of this historic, post-industrial brownfield. Upon acquisition, the City will receive \$1,000,000 from Bristol Street Enterprise, LLC (current property owner), along with committing an additional \$1,000,000 toward this demolition project, ensuring pre-demolition assessment, specs, and procurement will be completed prior to prospective awarded funds.

WDC/City submitted a \$4,000,000 CT DECD Brownfields Cleanup Grant to leverage this prospective federal funding toward the long-overdue demolition of this dilapidated infrastructure. By the time DECD funds

are awarded, the City will have finalized necessary negotiations for land acquisition and pre-demolition assessment, oversight of building abatement/removal, site inspections, additional material sampling (as needed), reporting, permitting, and funds toward demolition monitoring to begin. WDC will be the lead project manager for this demolition project, drafting RFPs/ITBs for Licensed Environmental Professional (LEP) Services. WDC contracted Tighe & Bond, Inc. to complete a Phase I ESA prior to site acquisition; due to this LEPs extensive experience and expertise in the City. Waterbury feels strongly that, with culminated investments and key stakeholders' engagement in this demolition project, this historic eyesore can move forward toward redevelopment.

ii. Resources Needed for Site Remediation

Contamination is attributed to the historic manufacturing activities that previously took place on the site. Bristol-Babcock received multiple compliance orders from CTDEEP between 1967 and 1979 for inadequate treatment of metal finishing wastewater and cooling water. CT DEEP issued a Notice of Violation (1992) for PCB releases from transformer oil, triggering remediation to occur within thirty-days. Phase II Subsurface Investigations (NESHAP compliant) define the co-mingled contamination impacting the site's soil, groundwater, sediment, and concrete. exceeding CT RSRs are present in Stormwater Drainage Systems, the sites' historic storage areas, and above/below ground storage tanks. Subsurface investigations (SI) attributes historic manufacturing to the hazardous building materials, asbestos, and contamination on site. A complete SI of the entire site is contingent upon demolition of the building, as indicated by HRP's Phase II – SI (2019).

iii. Resources Needed for Site Reuse

Name of Resource	Is the Resource for (1.c.i.) Assessment, (1.c.ii.) Remediation, or (1.c.iii.) Reuse Activities	Is the Resource Secured or Unsecured?	Additional Details or Information About the Resource
CT DECD Brownfields Round 18 RG	Demolition, Abatement, Debris Removal/Site Restoration	Unsecured	\$4,000,000 – Applied 9/22/23 for Demolition/Abatement
Private Contribution (Bristol Street Enterprise, LLC)	Development of AWP, Procurement, Demolition-Monitoring/Oversight, Abatement, Debris Removal/Site Restoration	Secured	\$1,000,000 – Committed upon Conveyance/Purchase toward Site Restoration

iv. Use of Existing Infrastructure

The City of Waterbury, CT DEEP, and CT DPH view this parcel as a priority for brownfield demolition and cleanup; various areas of standing walls are structurally unsound and contaminated with PCBs and asbestos. The city anticipates surrounding roads and infrastructure are suitable for this site's development. This site's Phase I ESA (2023) states that the Site's public utilities were not able to be determined due to the existing conditions and structural damage associated with the former electrical and phone services. Further site characterization is necessary to determine the availability of public utilities on this site. Ultimately, this project is contingent upon securing investments toward demolition, as the infrastructure continues to deteriorate, intensifying the public health and safety risks for the surrounding residents. Demolition of this eyesore will attract private investment, support workforce development, and promote EJ.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

a. Community Need

i. The Community's Need for Funding

The existing dilapidated, six-story building poses an "imminent threat and danger" to the site's surrounding residents (census tract 3519), indicative of the City of Waterbury's Building Inspector (2015). This site has been an ongoing concern for the city for the past decade. This building sits within a predominantly residential-area, associated with the Hop Brook and Town Plot Neighborhood, both of which have been engaged in past public engagement meetings.

The City/WDC is considering mixed-use development opportunities for this site's end-use, as it holds immense potential to centralize employment opportunities for the neighboring residents', as the surrounding area is challenged with a higher unemployment rate, lined with vacant brownfields. The vast majority of this site is highly developable due to its large acreage, industrial-use zoning, access to utilities, riverfront views, and proximity to multimodal transportation networks. This site lies less than 0.5mi from Route-8, along with the Amazon Distribution Facility to be situated at the former Waterbury-Naugatuck Industrial Park. Waterbury River Greenway, part of the Regional Naugatuck River Greenway, a 44-mi trail connecting municipalities across the State.

Mixed-use development in tandem with above-ground renewable energy technologies on the site would address the community's need for housing stock, workforce development, multimodal transportation, and positive environmental justice outcomes. Resident's living within a 1-mi radius of this site are transportation burdened, live in close proximity to a food insecure area, and grapple with an unemployment rate significantly higher than both state and federal average (9%) (EPA 2022). Demolition of this eyesore will attract private investment, support workforce development initiatives, and promote EJ for this community. Future redevelopment will be advantageous of the Naugatuck River and the newly constructed Greenway paralleling this site. This project will channel the surrounding community's industrial heritage, while being repurposed to suit the economic needs of the area.

ii. Threats to sensitive populations

(1) Health or Welfare of Sensitive Populations

The Bristol Babcock Facility lies between census tracts 3519 & 3516.02 (EJ Screen 2023). The surrounding residents living within the 'Project Area' (1-mi radius of the project site) are burdened with various socioeconomic and EJ supplemental indices (EJ Screen 2023).

The project area is identified as '**disadvantaged community**' per EPA-Inflation Reduction Act spatial mapping tools. This area has a significant population that is linguistically isolated (23%), obtains less than a high school diploma (14%), is low-income (26%) (EJ Screen 2023). This site falls within the 70-80th state percentile for particulate matter (75%), the diesel particulate matter (71%), Toxic Air Releases (76%), Hazardous Waste Disposal (73%), Proximity to Hazardous Waste (79%), and Wastewater discharge (74%). The site itself has posed an imminent threat and danger per the City's Building Inspector, CT DEEP, and USEPA. This site continues to impact the surrounding residents' health and well-being, as blighted-vacant lots are associated with increased risk of violence, chronic illness, and barriers to placemaking (Urban Institute 2017).

Moreover, surrounding residents are challenged with a high unemployment rate 9%, exceeding the region's (3.0%) and State's (3.5%) (2023, CT DOL). Nevertheless, 81% of those living within 1-mi of project area are of age of employment (18-over), displaying the site's potential to establish employment opportunities upon this site's demolition and cleanup (ACS 2023). The removal of blight, creation of grand list growth, and creation of jobs in this disadvantaged community will be supported by this redevelopment project, supporting

the surrounding residents', per capita income, public health & safety, environmental justice, and employment opportunities, and overall quality of life.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

This site is contaminated with hazardous materials that pose an imminent threat to the surrounding public. These historic structures are known to contain asbestos (built c. 1895, 1915, 1942, & 1954), PCBs, and PAHs, all of which are carcinogenic and can be linked to reproductive and other health effects (EPA 2023). This project will directly impact the health, safety and environmental risks associated with the demolition of structurally unsound buildings, as the remaining structures are in danger of imminent collapse. Previous assessment indicates various portions of the standing infrastructure containing asbestos – linked to a number of adverse health outcomes (Bickel 2020). This funding will enable the city to take proactive measures to safely abate hazardous materials, as the infrastructure has continued to deteriorate for decades. The surrounding community is at high risk for health issues surrounding cancer and asthma, indicative of these statistics. Blighted lots may also contribute to an underlying issue - toxic stress (South, 2015). Therefore, remediation of this blighted site will blight neighborhoods will lead to lower levels of toxic stress & greater mental health outcomes (South, 2015).

(3) Promoting Environmental Justice

The main focus of this large-scale urban renewal project is environmental justice by mitigating risk of adverse health effects associated with asbestos -- exposure lung cancer, asbestosis, and mesothelioma (EPA 2023). Inhaling asbestos fibers can lead to scarring of the lung tissue, which can result in the loss of lung function, disability and death (NIEHS 2017). Twenty-sites within this project area are cited for air pollution and toxic release criteria (EPA EJ Screen 2023). Many EJ indices reported in this project area surpass nation’s average, including asthma (11.4) and cancer (6.6) surpass the nations’ average. As such, this grant aims to delineate and eradicate hazardous substances/contaminants at the site by way of asbestos/abatement removal and demolition. This project will ensure asbestos NESHAP requirements for large-scale municipal demolition projects, providing safe practices on removal and disposal of hazardous building materials in an effort to protect human health and safety (USEPA OAR 2017). The city will use these regulatory guidelines throughout the projects, completing a thorough inspection and safe disposal of hazardous building materials to progress demolition. The city will ensure engagement of USEPA Region 1 Office, CT DEEP, CT DECD, and CT DPH before any demolition, or before any renovations of buildings that contain a certain threshold amount of regulated asbestos-containing material.

b. Community Engagement

i. Project Involvement & ii. Project Roles

Name of Organization	Point of Contact	Specific Involvement
City of Waterbury	Michael LeBlanc, Dir. of Finance mleblanc@waterburyct.org 203-574-6840	Applicant and Future Property Owner
Waterbury Development Corporation	Thomas Hyde, Interim Director thyde@nvrddconline.org 203-346-2607 ext.7283	Nonprofit Economic Development Agency and Project Manager for the Site
Environmental Protection Agency	EPA Region 1 (New England) 5 Post Office Square - Suite 100 Boston, MA 01209	Enrolled in EPA Brownfields Project Database Resource Conservation and Recovery Act (RCRA) Non-Generator/ No Longer Regulated (NLR)

Department of Economic and Community Development	Binu Chandy, Director of the Office of Brownfield Remediation & Development bindu.chandy@ct.gov (860)-500-2454	Financial Assistance Brownfield Assessment Funding 2018 - (\$200,000)
Department of Energy and Environmental Protection	Mark R. Lewis Brownfields Coordinator Connecticut Department of Energy & Environmental Protection Remediation Division Mark.Lewis@ct.gov (860) 424-3768	CT DEEP PCB Division Form III ECAF Filing (2000) Application for Enrollment into Municipal Brownfield Liability Relief Program (2023)
Naugatuck Valley Council of Governments	Rick Dunne, Executive Director rdunne@nvcoget.gov 203-489-0513	Administers EPA RLF Grant; submitting site as part of their FY24 EPA Community-Wide Assessment Grant.
Waterbury Neighborhood Council	Arthur Denze, Jr.; President (203)-755-5761	Will be invited to participate in community meetings.
Waterbury Regional Chamber of Commerce	Lynn Ward, CEO & President lward@waterburychamber.com 203-757-0701	Will be invited to participate in community meetings.
Naugatuck Valley Project	Alexander Kolokotronis, President 203-574-2410 alexnpct@gmail.com	Will be invited to participate in community meetings.
Main Street Waterbury	Carl Rosa, CEO crosa@waterburychamber.com (203)-757-0701	Will be invited to participate in community meetings.
Northwest Regional Workforce Investment Board	Catherine Awwad, Exec. Dir. catherine.awwad@nrwib.org (203)-574-6971	Will be invited to participate in community meetings.

iii. Incorporating Community Input

The city is dedicated to collaboration with stakeholders to address the needs of the community and brainstorm feasible solutions through this project's planning phase. EPA, DECD, DPH, DEEP, and NVCOG have had significant involvement with this site; the City/WDC will continue to be solicited for input as the project unfolds. The Naugatuck Valley Project and associated neighborhood representatives (Hop Brook and Town Plot Neighborhood Associations) will continue to be invited to meetings. The Northwest Regional Workforce Investment Board remains a potential partner for vocational programs, bringing jobs, education, and opportunities to the South End. The city will continue to communicate project progress to the local community

by way of city websites, social media and the local newspapers (the Waterbury Observer and the Republican American), taking precautions to ensure social distancing during such meetings and holding Zoom/virtual public meetings when necessary. Public commentary has been considered part of the decision-making process throughout the acquisition and future development planning of this site. The city had their monthly Board of Aldermen meeting, welcoming public input on the city’s acquisition of this site on Oct. 23, 2023 and Oct. 30, 2023. In addition, WDC hosted a community meeting on Oct. 26, 2023 to solicit public commentary on this FY24 EPA grant application and draft ABCA; the presentation, comments, and meeting minutes have been shared.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan

The proposed project will contribute to the following items: abatement of specifically-identified asbestos containing materials (ACMs), PCB materials <50ppm materials, and miscellaneous waste materials; the removal of specific abated portions of the building (est. 8,000-10,000 metric tons).

Non-EPA funded project tasks include the disposal of both non-hazardous contaminated concrete (est. 6,000-10,000 metric tons) and contaminated concrete (est. 2,000-6,000 metric tons). The City anticipates designating private fund commitments (\$1,000,000) to debris disposal costs. Estimated building abatement and removal task items are based on HRP Subsurface Investigation (2019). The city will continue to work diligently to progress site-characterization of the former Bristol Facility to progress the long-awaited removal of this building. Site restoration activities such as grading that prepare a site for reuse and similar activities that improve real property.

b. Description of Tasks/Activities and Outputs

Task/Activity 1: Asbestos Abatement/Removal
i. Project Implementation: abatement of specific-identified asbestos containing materials (ACMs), PCB materials <50ppm materials, and miscellaneous waste materials
ii. Anticipated Project Schedule: August 2024 – October 2024 (2.5 months)
iii. Task/Activity Lead: Contracted LEP & Demolition Contractor
iv. Outputs: One (1) professional service agreement (contract) between City and LEP; Removal of est. 2,000-6,000 metric tons abated materials.
Task/Activity 2: Demolition/Site Restoration
i. Project Implementation: Includes disposal of both non-hazardous contaminated concrete (est. 6,000-10,000 metric tons) and contaminated concrete (est. 2,000-6,000 metric tons).
ii. Anticipated Project Schedule: October 2024 –March 2024 (5 months) (Winter Shutdown)
iii. Task/Activity Lead: Contracted LEP & Demolition Contractor
iv. Outputs: One (1) Construction contract between the City and Demolition contractor; Removal of est. 318,000 Sq. Ft. former manufacturing facility.

c. Cost Estimates

Budget Categories		Task 1 - Asbestos Abatement/Removal	Task 2 - Demolition/Site Restoration	Totals
Direct Costs	Personnel			
	Fringe Benefits			

Travel			
Equipment			
Supplies			
Contractual	\$1,000,000	\$1,000,000	\$2,000,000
Other (subawards, meeting expenses, participant support cost)			
Total	\$1,000,000	\$1,000,000	\$2,000,000
Total Direct Costs	\$1,000,000	\$1,000,000	\$2,000,000
Indirect Costs			
Total Budget	\$1,000,000	\$1,000,000	\$2,000,000

Cost Breakdown
Task/Activity 1: Asbestos Abatement/Removal
Cost estimated for \$1,000,000 for abatement of specific-identified asbestos containing materials (ACMs), PCB materials <50ppm materials, and miscellaneous waste materials
Task/Activity 2: Demolition/Site Restoration
Cost estimated for \$1,000,000 disposal of both non-hazardous contaminated concrete (est. 6,000-10,000 metric tons) and contaminated concrete (est. 2,000-6,000 metric tons).

d. Measuring Environmental Results

Task	Methods of Tracking and Measuring Progress
1- Asbestos Abatement/Removal	<p>Outputs – One (1) professional service agreement (contract) between City and LEP; Removal of est. 2,000-6,000 metric tons abated materials</p> <p>Outcomes – Complete removal and safe disposal of hazardous material and increase public health outcomes through the removal of environmentally hazardous conditions</p> <p>Tracking Methods - deadlines for reports, copies of deliverables provided to EPA, CTDEEP and/or any required government agency.</p>
2- Demolition/Site Restoration	<p>Outputs – One (1) Construction contract between the City and Demolition contractor; Removal of est. 318,000 Sq. Ft. former manufacturing facility.</p> <p>Outcomes – Complete removal and safe disposal of structurally unsound infrastructure and increase public health outcomes through the removal of environmentally hazardous conditions</p> <p>Tracking Methods - deadlines for reports, copies of deliverables provided to EPA, CTDEEP, CT DPH, and/or any required government agency.</p>

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability: Organizational Capacity/Structure and Key Staff

The City of Waterbury has been a Waterbury’s current Mayor (Neil M. O’Leary) was re-elected to a fourth term in office and a second four-year term in 2019. In 2016, the EPA recognized Mayor O’Leary for his work in brownfield redevelopment and community redevelopment in the annual New England Environmental Awards in Boston. Mayor O’Leary was appointed as one of the members to the EPA’s Local Government Advisory Committee. A fierce advocate for Brownfield Revitalization, the city has remediated over 100 acres of brownfield sites under Mayor O’Leary’s administration. The mayor serves on the Board of Directors of “Jane Doe No More” as a result of his career in law enforcement that received national attention. He has worked

tirelessly to encompass a holistic and grassroots approach to community building, becoming commissioner of the City's Board of Education in 2009, and establishing a Police Activity League under his administration to serve at-risk youth throughout the city. Mayor O'Leary has worked collaboratively with neighborhood groups, launching an aggressive anti-blight campaign. Mayor O'Leary announced that he would not seek re-election this year, completing nearly 12-years as the City's top official and dedicated public servant.

Waterbury Development Corporation (WDC) is the City of Waterbury's designated 501-c3 Non-Profit Economic and Community Development Corporation. Governed by a 19-member Board of Directors, WDC represents members of diverse backgrounds, community members, elected officials, the NAACP, and private stakeholders. The Board reviews and approves all projects and contractual obligations at monthly board meetings. WDC runs a highly successful Brownfield Reinvestment and Redevelopment Program; oversees urban blight initiatives; and, manages key capital improvement projects within Waterbury.

The Interim Director of WDC, Thomas Hyde, brings to the organization political prowess & knowledge of economic development best practices, spending several years working under the State of Connecticut DECD's Commissioner, acting as special assistant to Governor Malloy, and more. Thomas takes an interest in working regionally and collaboratively, overseeing the Naugatuck Valley Regional Development Corporation and bringing his networking skills to the project.

A managerial project and economic development staff at Waterbury Development Corporation will assist Mansi, including Ronald Cassella, V.P. of Construction. Ron has over 40 years industry experience and has worked with some of the largest construction organizations in the State.

Ms. Mansi Doshi, a Civil Environmental Engineer, is one of the WDC project managers assigned to the demolition, debris removal, and remediation of this complex. She has successfully overseen the demolition of the 8 buildings on the Anamet parcel in 2022, simultaneously managing pre-demolition assessment on 835 South Main Street; she is intimately familiar with the site. A BIPOC woman who resides in Waterbury, Mansi is committed to improving Waterbury's community in an equitable way.

iii. Acquiring Additional Resources

The city has previously completed many Federal and State funded projects. The City is intimately familiar with the procurement guidelines of the EPA and will bid for contractors according to those guidelines. The project management professionals at WDC are familiar with both ITB and RFP processes. Lowest qualified bidders will be selected during the contracting and interviewing phase. The City will work closely with Connecticut DEEP and DPH to ensure all necessary permits are acquired.

b. Past Performance and Accomplishments

The City of Waterbury's successes in providing oversight and management of direct investments for brownfield revitalization, authenticates their ability to quickly and effectively revitalize abandoned, polluted and underutilized properties. **Since 2021, the City has successfully secured millions of dollars in culminated grant funding** to progress transformative redevelopment projects throughout the City.

Accomplishments:

The City of Waterbury has received numerous investments and oversight from USEPA. Most recent funding has been secured toward redevelopment of the Mad River Corridor (census tract 3505). In FY23, the City of Waterbury received a \$1,000,000 toward cleanup of 777 South Main Street; currently, design and planning is underway for future expansion of the City's Brass City Regional Food Hub – Brass City Harvest 501-c (3). In FY22, the City of Waterbury, was awarded a \$150,000 for the Former Waterbury Button Factory of 835 South Main Street (this project's adjacent parcel). This EPA Site-Specific Assessment Funding (EPA-OLEM-OBLR-21-04) will fund environmental assessment & site-specific re-use planning. Grant funds are currently being expended toward these sites' projects. In addition, the City submitted an CT DECD application toward this site's demolition and debris removal (\$4,000,000), with a matching component of \$2,000,000 funding from local sources and the former property owner.

Former Bristol Babcock Facility Abatement and Demolition
Threshold Criteria for 40 Bristol St
FY24 EPA Cleanup Grant Application

1. Applicant Eligibility

The City of Waterbury
235 Grand Street
Waterbury, CT 06702

The City of Waterbury is a General-Purpose Unit of Local Government (City) and as such is an organization that is eligible to receive Federal EPA Brownfields Cleanup Funding.

2. Previously Awarded Cleanup Grants

This site has not previously received an EPA Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

N/A

4. Site Ownership

The site was recently approved for acquisition by the City of Waterbury's Board of Aldermen on October 30, 2023. The applicant for this project is the City of Waterbury. WDC, on behalf of the City of Waterbury, is the site's Project Manager under a Master Municipal Agreement. WDC will oversee timeline & budget & all contractors, including the LEP, with all contractors providing schedule & budget updates & attending update meetings.

5. Basic Site Information

- a) Name of Site: Former Bristol Babcock Facility
- b) Site Address: 40 Bristol Street, Waterbury, CT 06708, Map Block No. 0546-1159-0043
- c) Current Owner (Pending): City of Waterbury, 235 Grand St, Waterbury, CT 06702

6. Status and History of Contamination at the Site

- a) The site is contaminated by hazardous substances & incidental petroleum impacts, the majority of the contaminants being hazardous substances.
- b) **Operational History/Current Use**: Former Bristol Babcock Facility from circa 1889 to 1989 consists of 6.6-acres consisting of four buildings having been constructed in 1895, 1915, 1942, and 1954. The former heavy-industrial complex was known to manufacture steel belt lacing, recording pressure gauges (temperature, pressure, electricity, etc.) along with various metal-based manufacturing mechanisms. Operations ceased at the site in 1989. The site has sat vacant since 1990, under ownership of Bristol Street Enterprises, LLC, until 2023.
- c) **Environmental Concerns**: The interconnected buildings on this site exceeds CT RSRs. Over ten RECs were identified within the building, including PCBs (below EPA 50mg/kg), asbestos,

lead-based paint, mercury, and lead (among other contaminants). CTDEEP and CT DPH requires the hazardous building materials to be abated and demolished under an alternative work practice to ensure protect human health exposure to hazardous materials. No abatement activities have taken place on this site from 2018 to 2022. In 1992, EPAs Brownfields Assessment team reported various PCBs were present on site following limited soil testing, triggering removal of eight vandalized transformers. The fire that struck the building in 2015 triggering re-engagement of USEPA in addition to CT DPH, CT DEEP, and the City’s Building Inspector involvement per concerns of exposure to aerosolized toxic chemicals and asbestos and planning for prospective emergency demolition. State agencies concluded an alternative work practice (AWP) would be necessary to ensure removal of contaminated building materials are demolished and disposed safely. Site safety, in lieu of resident’s public health and safety, is the #1 priority of this demolition project, as the “imminent threat and danger” of this dilapidated building has increased overtime.

- d) **Source of contamination and the extent:** Over 10 RECs/AOCs and 21 AOCs are reported within building materials, according to this site’s Phase I ESA (2023). However, further site characterization is necessary to delineate the full extent of contamination, as the selected LEP could not enter within the building, creating data gaps in the assessment of the interior structures. Hazardous building materials report (2019) recommends
- e) Contamination is attributed to the historic manufacturing activities that previously took place on the site. Bristol-Babcock received multiple compliance orders from CTDEEP between 1967 and 1979 for inadequate treatment of metal finishing wastewater and cooling water. CT DEEP issued a Notice of Violation (1992) for PCB releases from transformer oil, triggering remediation to occur within thirty-days. Phase II Subsurface Investigations (NESHAP compliant) define the co-mingled contamination impacting the site’s soil, groundwater, sediment, and concrete; further site characterization is contingent upon completion of demolition.

7. Brownfields Site Definition

40 Bristol Street on CT DEEP’s Brownfield Inventory, alongside US Brownfields EPA database.

- a) The Subject Property has an EPA ID No. CTD981898406 and is not currently on the National Priority List.
- b) The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.
- c) The site is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

Building Condition Assessment (HRP) 2018; Phase I ESA (HRP) 2018; Limited Phase II ESA – Subsurface Investigation HRP (2018), and Pre-Demolition Hazardous Survey Report HRP (2019) were previous environmental investigation activities conducted at the site. The HMSR

included a NESHAP-type asbestos-containing materials (ACM) survey; lead based paint screening survey; PCB containing materials survey; and a PCB-containing materials survey; and survey of hazardous materials. Investigation was limited in scope due to the lack of structural integrity of the vast majority of the remaining structures.

Historic Environmental Reports completed for this property include the following:

- Environmental Audit Report, EEW Management – December 5, 1986
- Phase I Environmental Site Contaminant Assessment Report, HRP – November 26, 1990
- Phase I Environmental Site Contaminant Assessment Report, HRP – November 26, 2002
- Final Quality Assurance Project Plan for the Former Bristol Babcock Facility, HRP – May 13, 2003
- DRAFT Subsurface Environmental Investigation Report, HRP – August 1, 2003

9. Site Characterization

- i. The City and WDC recently submitted an application to enroll this site into Connecticut DEEP's Municipal Brownfields Liability Relief (MBLR) Program, ensuring compliance with DEEP's Significant Environmental Hazard (SEH). According to the site's Phase II Subsurface Investigation, the site shall be remediated under Connecticut's Voluntary Remediation Program, the end result of which would be compliance with the RSRs due to the presence of soil and groundwater impacts observed at the site that exceed applicable Remediation Standard Regulations (RSRs).
- ii. The site shall be enrolled in CTDEEP's Voluntary Remediation Program (VRP), ensuring the LEP/contractor abides all CT RSRs per sec.22a-133k-1.
- iii. Please see the attached letter from Connecticut DEEP. CT DEEP requires completion of an Alternative Work Practice (AWP) to enable abatement of contaminants, selective demolition of the ACM materials, and demolition of the remaining structures. Such investigations are necessary to progress demolition. The City has recently submitted an application for this site into USEPA's Targeted Brownfields Assessment Program to develop an Alternative Work Practice (AWP) per Phase I (2023).

10. Enforcement or Other Actions

This site has been enrolled in numerous environmental databases, including CT UST, LUST, CT DEEP PCB Program, CT Property Transfer Program (ID# 3154), State of CT's Hazardous Waste Site database, a RGA Hazardous Waste Site, and one (1) active Leachate and Wastewater Discharge Site permit. Additionally, the site has been listed in EPA's database (EPA ID No. CTD981898406).

This property is listed under the CERCLA as well as in EPA and CT DECD Brownfield Project's database, with CT DECD indicating that this site was presumably "too far gone for rehab"

post-fire of 2015 (CTMills, 2023). As such, the PCB-containing items shall be disposed of in accordance with the TSCA and RCRA regulations.

There were several UST tanks were located on an adjoining property related to the subject site. Bristol Babcock is listed in the leaking underground storage tank (LUST) database for an incident reported in 1993. However, the status of these USTs are listed as complete, meaning there is no significant environmental hazards remaining on the property. Based on the site's most recent Phase I ESA (2023), all identified USTs were closed on September 2nd, 2009. The Site is also listed in the RGA LUST database for 2002-2012, due to the historical LUST at the property.

11. Sites Requiring a Property-Specific Determination

A Property Specific Determination is attached.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility Hazardous Substance Sites

i) Exemptions to CERCLA Liability

4) Property Acquired Under Certain Circumstances by Units of State and Local Government

a) The City of Waterbury acquired the parcel through Purchase and Sales Agreement.

b) The City's Board of Aldermen approved authorization for the acquisition of the parcel on October 30th, 2023 and is working diligently to execute this real-estate contract.

c) The disposal of all hazardous substances at the site occurred prior to the City's acquisition of the site.

d) The City of Waterbury has not caused or contributed to any release of hazardous substances at this site.

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

13. Cleanup Authority and Oversight Structure

- a. Waterbury Development Corporation will manage the project site on behalf of the City of Waterbury per Master Municipal Agreement (MMA) and Project Authorization Letter (PAL). WDC anticipates this site's enrollment in CT DEEP's Voluntary Remediation Program commence to ensure compliance with CT RSRs, as stated in the Phase I ESA (2023). Work to be completed utilizing this funding includes asbestos abatement and demolition of the 310,800 sq. ft building(s). CT DPH and CTDEEP will be involved in this project during the abatement and demolition phase and the LEP/selected contractor for demolition monitoring/oversight will be responsible for acquiring all necessary permits for CTDEEP. The City will utilize the \$1,000,000 from the Property Owner toward obtaining all permits/approvals, updating of a Hazardous

Building Materials Survey, completion of all hazardous building materials abatement work, the development of an Alternative Work Practice (AWP) Plan, all to be completed by a Licensed Professional Engineer who will also be responsible for demolition oversight and monitoring services of this project. The selected contractor will be responsible for ensuring all local, state, and federal health and safety regulations are met. The selected LEP is also responsible for satisfying the City of Waterbury's RFQ, and any Change Orders issued by the City after the execution of the binding contract between the LEP and WDC. All applicable federal and state laws will be complied with to ensure that this project protects human health and the environment. An LEP will be selected for 40 Bristol Street after receiving funding. The contractor that is selected to perform the scope of work related to this project will be chosen through a fair, transparent hiring process outlined in the City's Code of Ordinances.

- b. The City is working diligently to acquire the three (3) properties neighboring this site, two vacant land parcels on Bristol Street, and a parcel of land listed as Elise Drive. The Naugatuck Valley Project and neighborhood associations have offered support for this project, as this building has remained a public health and safety threat in their community. The City and WDC are working diligently to ensure that surrounding residents are engaged in the planning phase and will continue such efforts during demolition and remediation. The contractor will be responsible for compliance with NESHAP, OSHA, and other Federal and State demolition regulatory guidelines.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

Please see attached Draft Analysis of Brownfield Cleanup Alternatives.

b. Community Notification Ad

Please see the attached Community Notification Ad within the Community Notification Documentation.

c. Public Meeting

Please see attached Community Notification Documentation.

d. Submission of Community Notification Documents

The following documentation has been attached to this application.

- A copy of the draft ABCA;
- A copy of the newspaper ad (or equivalent) that demonstrates solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA. An equivalent method may include, for example, a dated image of the website or copy of the listserv message used to notify the public;

- The comments or a summary of the comments received; (no comments received)
- WDC's response to those public comments; (N/A)
- Meeting notes or summary from the public meeting(s); and
- Meeting sign-in sheet/participant list.

15. Named Contractors and Subrecipients

Contractors: N/A, Not Named Subrecipients: N/A, Not Named



November 1, 2023

Mr. Thomas Hyde
Waterbury Development Corporation
83 Bank Street
Waterbury, CT 06702

Re: State Acknowledgement Letter for EPA Brownfields Cleanup Grant for FY24

Dear Mr. Hyde:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the City of Waterbury intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2024. The City of Waterbury plans to use the grant funding to remediate the property at 40 Bristol Street in Waterbury, CT (the Site) that is contaminated with hazardous substances.

Cleanup work funded by an EPA grant must be performed in one of Connecticut's formal remediation programs, including but not limited to the Voluntary Remediation Program pursuant to CGS §22a-133x. The Site is eligible for this program and may also be eligible for the Brownfields Remediation and Revitalization Program pursuant to CGS §32-769. The Site is not currently enrolled in either of these programs. The Site is currently enrolled in the Municipal Liability Relief Program pursuant to CGS §22a-133ii. This program is not a stand-alone cleanup program. The City of Waterbury has indicated that it intends to enroll the Site in one of the above referenced programs if EPA awards funds.

DEEP acknowledges the receipt of the reports documenting the environmental condition at site the Site:

- Phase I Environmental Site Assessment by Tighe & Bond, Inc. dated September 2023
- Phase II Subsurface Investigation Report by HRP Associates, Inc. dated January 2019
- Pre-Demolition Hazardous Materials Survey Report by HRP Associates, Inc. dated January 2019
- Building Condition Assessment Report by HRP Associates, Inc. dated December 2018

DEEP concludes there is a sufficient level of site characterization from the investigations performed to-date for the remediation work to begin at the Site.

You may want to refer to DEEP's PREPARED Municipal Workbook. This on- line guidebook is designed to help municipalities navigate the complex process of remediating and redeveloping brownfields. The Workbook is available [here](#) on DEEP's website.

If you have any questions about this letter, please contact me at (860) 424-3256 or by e-mail at meena.mortazavi@ct.gov. Good luck with your application.

Sincerely,

A handwritten signature in black ink, appearing to read 'Meena Mortazavi', with a stylized flourish at the end.

Meena Mortazavi
Environmental Analyst

c: Ms. Katy Deng, EPA (via e- mail)