Julia Pemberton
First Selectwoman
Office: 203-938-2002

Town Hall
100 Hill Road
Redding, CT 06875

Narrative Information Sheet
U.S. EPA Brownfield Cleanup Grant Application

1. Applicant Identification
   Town of Redding Connecticut
   100 Hill Road, P.O. Box 1028
   Redding, CT 06875

2. Funding Requested
   a. Grant Type = Single Site Cleanup
   b. Federal Funds Requested = $1,991,000

3. Location
   a) Town of Redding
   b) Georgetown (Census-Designated Place)
   c) Fairfield County
   d) Connecticut

4. Property Information
   Gilbert & Bennett Wire Mill Manufacturing Site
   20 North Main St. (primary site)
   Redding, CT 06896

5. Contacts
   a. Project Director
      Julia Pemberton
      First Selectwoman
      Town of Redding Connecticut
      100 Hill Road, P.O. Box 1028, Redding, CT 06875
      203-938-2002 (ext 1)
      jpemberton@townofreddingct.org

   b. Chief Executive/Highest Ranking Elected Official
      Julia Pemberton, First Selectwoman
      Town of Redding Connecticut
      100 Hill Road, P.O. Box 1028, Redding, CT 06875
      203-938-2002 (ext 1)
      jpemberton@townofreddingct.org

6. Population
   8,765 (2020 U.S. Census)

7. Other Factors Checklist

Other Factors	Yes/No	Page #
Community Population is 10,000 or less	Yes	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No	N/A
The proposed brownfield site(s) is impacted by mine-scarred land	No	N/A
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.	No	N/A
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).	Yes	1
The proposed site(s) is in a federally designated flood plain.	Yes	2-3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Yes	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Yes	3
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Yes	2, 3 ABCA 14-15
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	No	N/A

Summary of Other Factors:
Population under 10,000: Redding is a small community of approximately 3,500 households and 8,765 people.
Property is adjacent to a water body: The property includes a 12-acre Factory Pond, an impoundment of the Norwalk River, which flows south over the factory dam bisecting the property. This application proposes environmental cleanup of three sites within the wire mill property: the West Pond and Gateway Areas of 20 North Main St., and the "OMS" Area at 50 Bennett St. The West Pond Area (12.2 acres) surrounds the west side of the pond; The OMS Area (3.7 acres), borders the northeast side of the pond.
Proposed site is within a flood plain: Factory Pond, the bordering shoreline, and the Norwalk River fall within the current 2010 FEMA floodway (FIRM 09001C0243F), and the Mill Center is within the AE Zone. The OMS and Gateway Areas fall within the AE Zone under the proposed 2023 FEMA update (FIRM 02001C0243G) and portions of the Mill Center will fall within the proposed floodway.
Use of renewable energy: The Town intends to incorporate solar panels on the roofs of new housing units, the former industrial buildings, over parking and other site areas.

Use of energy efficient measures: The Town intends to promote the use of the latest building envelope, appliance, water and habitat conservation in new construction and building renovations.

- Climate adaptation: The reuse plan focuses on a walkable mixed-use downtown and adaptive reuse of historic structures, public parks along the pond shoreline, and a pedestrian and bike friendly greenway through the site connecting Georgetown Village and the Branchville commuter railroad station. Flood and climate mitigation measures will be addressed by expanding wetlands and creating greenspace along the pond, and utilizing green infrastructure such as rain gardens, pervious pavement, and infiltration zones where appropriate, and by complementing Redding's tradition of green space through vegetative plantings across the site. The recommended soil remediation alternative is in line with the goals of the Standard Guide for Greener Cleanups (ASTM E2893-16e1), which accomplishes cleanup of these areas while minimizing equipment energy use and emissions. The recommended alternative limits extensive excavation and equipment usage that would result in added energy use and emissions, as well as greater disturbances to land and ecosystems in close proximity to Factory Pond and the Norwalk River. Principles of sustainable resilient remediation (SRR) design will be incorporated into the project to limit environmental impacts, maximize social and economic benefits, and create resilience against the increasing threat of extreme weather events.

8. Releasing Copies of Applications
Not applicable.

Best Regards,

Julia Pemberton

First Selectwoman
Town of Redding, CT

November 12, 2023

Submission Date

NARRATIVE INFORMATION SHEET ATTACHMENT

Letter from State Environmental Authority

November 1, 2023

Ms. Julia Pemberton
First Selectwoman
Town of Redding
100 Hill Road, P.O. Box 1028
Redding, CT 06875

Re: State Acknowledgement Letter for EPA Brownfields Cleanup Grant for FY 24

Dear Ms. Pemberton:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Town of Redding intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2024. The Town of Redding plans to use the grant funding to remediate the properties at 20 North Main Street and 50 Bennett Street in Redding, CT (the Site) that are contaminated with hazardous substances and/or petroleum.

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. The Site may also be eligible for the Brownfields Remediation and Revitalization Program pursuant to CGS §32-769. The Site is not currently enrolled in any of these programs. The Town of Redding 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 the Site:

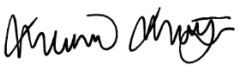
- Phase I Environmental Site Assessment (ESA) by Tighe & Bond, Inc. dated June 2023
- Environmental Data Gap Analysis Report by Tighe & Bond, Inc. dated June 2023
- Hazardous Building Materials Data Gap Analysis Report by Tighe & Bond, Inc. dated June 2023

DEEP concludes there is a sufficient level of site characterization from the ESA and additional Data Gap Analysis Reports 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 on 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,



Meena Mortazavi
Interim Brownfields Coordinator

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

NARRATIVE

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (55 Points)

1. a. Target Area and Brownfields (15 points)

l.a.i. Overview of Brownfield Challenges and Description of Target Area (5 points)

The Target Area is the Georgetown neighborhood within the Town of Redding (population 8,765). Located in the Norwalk River valley at the corner of four towns: Redding, Wilton, Ridgefield and Weston, Georgetown is Redding's only urbanized area and falls within census tract # 09-001-240100. The area is zoned for business and commercial uses, small-lot single-family housing and multifamily housing.

The Georgetown neighborhood developed around the Gilbert and Bennett Wire Mill, a maker of fabricated metal products. Established in 1818, the Wire Mill factory was the main source of employment for Redding residents and the focal point of Georgetown. Three hundred jobs were lost, along with Redding's largest source of commercial tax revenue, when the mill ceased operations in 1989, leaving behind a legacy of soil contamination and abandoned buildings, and depressing the economy of the surrounding commercial district and residential neighborhood.

The Wire Mill property was acquired by a private developer in 2002 for a mixed-use development plan that won an EPA National Smart Growth Achievement award and designation as a "Green Building and Sustainable Design Designation" by the US Treasury Department. In the aftermath of the 2008 financial crisis the development plan failed. By 2014, Redding was faced with more than five million dollars in unpaid taxes and sewer fees, deteriorating historic structures, and unremediated soil. The Town began foreclosure proceedings on the property in 2015. In 2021, after five years of litigation, Redding acquired a 44-acre portion of the property through tax foreclosure, which included the core of the former Wire Mill. The environmental and economic impacts continue to affect the Town and the residents of Georgetown. Given the size and extent of blight and contamination at the property, this grant is necessary to facilitate cleanup and redevelopment, and mitigate the long terms impacts of the site on the surrounding community.

1.a.ii. Description of the Proposed Brownfield Site(s) (10 points)

The Wire Mill property is in a residential area within a Transit Oriented Development District. The Metro North Branchville train station connecting Redding to New York City is located less than one mile north of the property. The 44-acre Wire Mill property is subdivided into several areas around the Factory Pond, including multiple buildings and areas of soil contamination. The property includes the 12-acre Factory Pond, an impoundment of the Norwalk River, which flows south over the factory dam bisecting the property. This application focuses on three areas of the property: the West Pond and Gateway Areas of 20 North Main St., and the "OMS" Area at 50 Bennett St.

The West Pond Area (12.2 acres) surrounds the west side of the pond and was previously used for material and product storage. Several dwellings were located within this area, with one dilapidated dwelling remaining. The OMS Area (3.7 acres), on the northeast side of the pond, lies adjacent to multifamily housing along Portland Ave. and was used for wire cutting operations. Multiple environmental investigations were conducted prior to 2007, and recently updated by the Town through a 2021 grant from the Connecticut Department of Economic and Community Development (DECD) Office of Brownfields Remediation and Redevelopment (OBRD) to perform Phase I/II and limited Phase III investigations and fill data gaps from the prior studies. Targeted Remedial Action Plans were developed for the West Pond and OMS Areas under the 2007 investigations. Recent investigations identified several data gaps, and additional soil and groundwater sampling was conducted in Summer 2023. Based on a review of historical and current data, soil contamination was identified in each of the three areas of this grant application. Impact above the Connecticut Remediation Standard Regulations (RSRs) was identified in these areas and primarily consisted of metals with polycyclic aromatic hydrocarbons (PAHs) and/or extractable total petroleum hydrocarbons (ETPH) identified at the West Pond and OMS Areas. A second DECD grant awarded in 2023 will be used to complete any additional environmental sampling to refine the remedial action plans prior to beginning cleanup work under the scope of this grant application.

The Gateway Area (1.6 acres) is located adjacent to the main commercial area of Georgetown and across

the street from a daycare facility and church. It includes two partially occupied buildings: the original factory Main Office and Machine Shop, where the National Park Service leases space to support Weir Farm. The Machine Shop includes a small Cafeteria addition. These buildings form the gateway to the site from the commercial area and currently have a limited number of tenants. Studies of building structures and hazardous building materials were conducted prior to 2007 and revised as part of the 2021 DECD grant. Asbestos containing pipe insulation, flooring, cement boards and ceiling materials were observed in the Main Office, Machine Shop and Cafeteria addition. Historical inspection data for lead or PCBs was not documented, but these materials are likely present given the age of the buildings and materials observed during the site visits. Water staining from leaks presenting the potential for mold were observed in all buildings. The Cafeteria is in a dilapidated condition, and general trash and debris were noted in unoccupied areas of the Machine Shop which is covered in peeling elastomeric paint. Abating hazardous building materials in these buildings will allow the Town to expand the tenant base and enhance the appearance of the site, improving the value of the surrounding commercial area.

1. b. Revitalization of the Target Area (20 points)

1.b.i. Reuse Strategy and Alignment with Revitalization Plans (10 points)
The Wire Mill property, a key part of the Georgetown National Register Historic District, is listed in both the State and Regional plans for economic development. The property is identified as a priority in the Western CT Comprehensive Economic Development Strategy (CEDS), approved by the State in 2017 and by the Federal government in 2018 and is consistent with the most recent 2023-2028 Western CT CEDS (2017-22; 2022-27). Wire Mill redevelopment has been identified as a priority in the Town of Redding Plan of Conservation and Development (POCD) since 1998. These plans note that redevelopment of the Wire Mill is the Town's best opportunity to realize economic growth, expand its commercial tax base and provide affordable workforce housing.

A major Town goal is to promote the Georgetown's livability for residents, enhancing the character of Redding's commercial zone by cleaning up the blight of the former Wire Mill and investing in a walkable downtown that enlivens the area and stimulates economic growth in an environmentally and culturally sustainable manner. Presently the dilapidated factory buildings loom over Georgetown and present a health and safety hazard to the neighborhood.

Based on feedback from public meetings held in 2022 and 2023, and comments shared in smaller working groups, the emerging vision for redevelopment builds upon the 2005 master plan of a walkable mixed-use downtown, and includes:

- Affordable workforce and senior housing. The Town of Redding currently has no housing that meets State statutes for affordable housing.
- Municipal spaces, public parking, public parks along the pond shoreline and a pedestrian and bike friendly greenway through the site connecting Georgetown Village and the Branchville Metro North railroad station.
- Adaptive reuse of the historic structures with concepts including municipal offices, public meeting space, artist/maker space, shared office, and medical facilities.

The Town plans to develop the Wire Mill in phases, so the community can access portions of the property and envision the potential of the pond setting and historic architecture. We feel this will attract creative uses for the site's historic core and build a rejuvenated Georgetown neighborhood. The first phase is to improve the Gateway Area by improving the Machine Shop and Main Office buildings and providing safe public access to Factory Pond from the West Pond and OMS Areas. The proposed remediation and HBM abatement will directly support these activities and enable residential development in the West Pond and OMS Areas, promote growth in the adjacent commercial area and spur interest in the historical center of the North and South Mill Yard Areas, which will be developed in later phases.

Factory Pond, the bordering shoreline, and the Norwalk River fall **within the current 2010 FEMA**

floodway (FIRM 09001C0243F), and the Mill Center is within the AE Zone. **The OMS and Gateway Areas fall within the AE Zone under the proposed 2023 FEMA update (FIRM 02001C0243G)** and portions of the Mill Center will fall within the proposed floodway. **Flood and climate mitigation measures** will be addressed by **expanding wetlands and creating greenspace along the pond, and utilizing green infrastructure such as rain gardens, pervious pavement, and infiltration zones where appropriate, and by complementing Redding's tradition of green space through vegetative plantings across the site.**

1.b.ii. Outcomes and Benefits of Reuse Strategy (10 points)
The proposed remediation will help redevelop a property that is critical to Redding's future and will reinvigorate development in Georgetown. This project will open the site to public access and provide a foundation for the Town to build needed affordable and workforce housing not feasible anywhere else in Redding. As the site owner, the Town will be able to manage development intensity, complementing the small lot single and multi-family homes that already exist in the Georgetown neighborhood.

In parallel with this remediation program, the Town's 5-year plan for the site is to improve the landscaping and maintenance of open areas and site structures, which will in turn revitalize Georgetown's adjacent main street area. Redevelopment of the site will, over time, create significant benefits for the community through the creation of public meeting and entertainment facilities as well as green open space and walking trails that will provide access to Factory Pond, which is currently inaccessible to the community. The community will also be enriched through the restoration of the industrial heritage of the site as the Town begins to preserve and renovate the former industrial buildings.

The Town's vision is to incorporate **best practice conservation techniques and renewable energy** into the redevelopment plan, starting with **measures to reduce emissions during construction**. As the site's owner, the Town intends to **promote the use of the latest building envelop, appliance, water and habitat conservation, green infrastructure, and climate mitigation measures for renovated and new construction to showcase resource conservation** opportunities, reduce the site's carbon footprint, and enhance operating affordability. Where appropriate, the Town intends to use **solar panels on the roofs of new housing units, the former industrial buildings, over parking and other site areas**.

Town revenues will increase significantly as the site is redeveloped and Georgetown Village improves, benefiting the Town's financial status. The Town plans to reinvest this revenue back into the site and Georgetown thereby further benefiting the neighborhood.

1. c. Strategy for Leveraging Resources (20 points)

1.c.i. Resources Needed for Site Characterization (5 points)
Extensive environmental investigations have been conducted at this site since the factory closure in 1989, including more than $30 million in private and public funds previously invested in the site for redevelopment planning, design and engineering, environmental assessment, abatement of hazardous building materials, demolition, and construction of critical wastewater infrastructure. That funding put the building blocks required for redevelopment into place. Under a $200,000 2021 DEDC assessment grant, the Town has completed Phase I/II environmental site assessments, data gap analysis, building condition and safety assessments and historical review of HBM studies, limited Phase III investigations and cost analysis. A second $200,000 DEDC grant awarded in 2023 will complete characterization of the site for contaminants in soil, groundwater, sediments, and building materials. We expect the currently awarded funding will be sufficient to fully characterize the site.

1.c.ii. Resources Needed for Site Remediation (5 points)
We are confident that the funding requested under this grant will be sufficient to complete the proposed remedial activities as outlined in this scope of work. Should unanticipated expenses arise, site service fees from current tenants are allocated to site management. A local fund balance of $350,000 is available to address unanticipated expenses.

1.c.iii. Resources Needed for Site Reuse (5 points)
The Town plans to apply for additional state funding to support development of the trails and park area adjacent to the pond and to support the development of affordable workforce and senior housing. Additional funding will also be sought from SHPO to assist with the stabilization of the existing mill buildings in the North and South Mill Center Areas supported by a Town match. We anticipate additional EPA and DECD grants will be needed in the future to address contaminated soils in the North and South Mill Center Areas following development of specific reuse plans for these areas of the site.

1. c.iv. Use of Existing Infrastructure (5 points)
The Main Office and Machine Shop buildings at the Gateway Area, are currently connected to the local power grid and served by public water and sewer. These buildings will be abated to expand tenant use. As part of future redevelopment, the public water, sewer, and natural gas services will be extended throughout the site to support development at the West Pond and OMS Areas. Paved areas adjacent to the Machine Shop are available for parking, which will be expanded with the demolition of the Cafeteria addition.

The existing water pollution control facility (WPCF) has already been expanded to provide sewer capacity for a redeveloped Wire Mill site. The WPCF expansion was funded in part by a $5 million USDA rural agriculture program loan to the Georgetown Special Taxing District. The expanded WPCF has a CT DEEP permitted capacity of 245,000 gallons per day (gpd). Of that capacity, 170,000 gpd is committed for the redevelopment of the Wire Mill site.

The Wire Mill site is adjacent to the Metro North Railroad Danbury Branch Line with the existing Branchville train station under one mile from the core of the target site. Commuter rail and local bus service along the Norwalk-Danbury Route 7 corridor is within 1/4 mile of the site. The Norwalk Valley Trail, a 30-mile walking and bicycle path between Norwalk and Danbury, will pass near the site.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (40 Points)

2. a. Community Need (25 points)

2.a.i. The Community's Need for Funding (5 points)
Redding is a small community of approximately 3,500 households and 8,765 people. It lacks a commercial tax base and is overly reliant on residential property taxes to fund public services. The local tax burden on residents is high. 33 percent of Redding households are cost burdened, according to data published in the 2021 United Way Alice Report for Connecticut: A Financial Hardship Study.

The Wire Mill property, traditionally a major component of Redding's tax base, has been off the tax rolls after the bankruptcy of the site's private developer in 2008. A decline in State funding to the Town has unfortunately coincided with the drop in tax revenue from the Wire Mill property's closure nearly 40 years ago. Redding has minimal commercial districts for traditional employment and business development; but Georgetown is one and the redevelopment of the Wire Mill site will have long-term importance to both the tax base and the vibrancy of the community.

Redding lacks the staff capacity and local funds needed to clean up the industrial contamination of the site and to redevelop it on its own. Local funds are needed for immediate building stabilization, management and oversight of the site and its current tenants, and redevelopment planning. State and Federal brownfields redevelopment and infrastructure funding is needed to leverage these limited local funds.

2.a.ii. Threats to Sensitive Populations *(20* points)

(1) Health or Welfare of Sensitive Populations (5 points)
According to EJSCREEN, Census Tract 2401 that includes the Wire Mill, includes several populations that exceed the state and national average, including children under the age of 5 (66th percentile nationally, 74th in state), population over 65 (81st percentile nationally), linguistically isolated and unemployed (both 65th percentile nationally). These populations disproportionately suffer from the welfare issues associated with blight and are exposed to health risks from contamination. There is a daycare facility across the street from

the Machine Shop and the OMS Area is adjacent to a multifamily residential area. Graffiti and debris on-site and in buildings indicate that people can access the site at all times of the day and night. The proposed remediation that will be facilitated by this grant will clean up and secure the areas of the site closest to these populations and the commercial area of Georgetown.

(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 points): According to EJSCREEN, the cancer prevalence in Census Tract 2401 that includes the target site is at the 97th percentile both across the state and the nation. Exposure to hazardous pollutants found at the site, including heavy metals and hazardous building materials exacerbate the risks and health burdens to the sensitive populations in the Target Area. This grant will directly reduce these threats by eliminating contaminated soil and hazardous building materials that are risk factors for cancer and other conditions.

(3) Environmental Justice (10 points)

(a) Identification of Environmental Justice Issues (5 points)

Georgetown is a historically mixed-income immigrant neighborhood located in the only urbanized census tract in Redding. There are several environmental indicators that exceed the national average for Georgetown CDP (Ozone 95th percentile, Pb paint 52nd percentile, Superfund proximity (57th percentile) and USTs (53rd percentile), which indicate additional burdens on the local community beyond the contamination and blight related to the mill. The area is characterized by modest homes on small parcels originally constructed by the Gilbert & Bennett factory workers whose families lived, worked, went to school, and prayed, all within walking distance of the factory. Further deterioration of the site structures could pose environmental risks to families living near the Wire Mill site and cause further degradation of property values in Georgetown.

(b) Advancing Environmental Justice (5 points)

Redevelopment of the Wire Mill property will increase the diversity of housing options in the area, which is expected to lead to a greater diversity of incomes among its residents and provide an opportunity for small businesses to flourish. The redevelopment of the property will not displace current residents or businesses in the Target Area, the Georgetown neighborhood, and the cleanup of the contaminated soil and hazardous building materials at the site will decrease the exposure of individuals sensitive to environmental burdens. The redevelopment is intended to increase amenities in the neighborhood, such as public access to the Factory Pond, other public and municipal uses, and additional parking for businesses. In addition, its location near the Metro North rail line and local bus routes makes the site attractive to those residents who may be dependent on public transportation for their jobs and those traveling to work in the area.

2. b. Community Engagement (15 points)

2. bi. Project Involvement (5 points)

When redevelopment planning for the Wire Mill site was first initiated in 2002, members of the public were actively engaged in the planning process. A 2004 Design Charette, attended by hundreds of residents over 2-3 days, resulted in a master plan for development that garnered tremendous community support and was approved by all of Redding's land use boards after public hearings. While that master plan did not come to fruition, the components of the plan remain popular with Redding residents.

In 2014 Town officials prepared to foreclose on the property and the Town held several public forums to provide opportunities for public input on the disposition of the Wire Mill site. These forums included presentations by experts in brownfield redevelopment and the adaptive reuse of historic mills to help educate citizens about the challenges and successful outcomes of remediating these environmentally contaminated sites. After the Town gained control of the site in 2021, the Board of Selectmen created the Gilbert & Bennett Wire Mill Advisory and the Redding Economic Development Committees to harnesses the expertise of local volunteers to support the redevelopment planning process and town-wide economic growth, and to expand community involvement. Both Committees hold monthly public meetings, and their work is ongoing and covered extensively by the local town newspaper, The Redding Sentinel. The Wire Mill Advisory Committee has coordinated two public meetings to update residents on the environmental

investigations conducted under the DECD grant, and to solicit feedback and input regarding plans for the site. The Town's website also contains a dedicated page to keep residents informed and to provide access to all current documents pertaining to the Wire Mill property.

In 2023, the Town began work with the University of Connecticut's Technical Assistance for Brownfields (UCONN TAB) program to prepare a site conceptual plan to generate community input. The Town is also planning to directly engage a separate planning firm to conduct a formal redevelopment planning process and a market study analysis for all of Georgetown. This public process will include a series of visioning workshops and other tools to solicit input from in the community.

2. bii. Project Roles (5 points)

There are many local organizations that will contribute to this project, and the opinions of residents will be a priority in the Wire Mill redevelopment. The main partners include, but are not limited to:

Entity Name	Point of Contact	Project Role
G&B Wire Mill Advisory Committee	Amy Atamian, Chair 203.300.6162 [redacted]	Leads redevelopment planning, RFP preparation, contractor selection, project oversight, and public communications.
Redding Economic Development Committee	Richard Wenning, Chair 303.601.7454 rich@befoundation.org	Leads community involvement and solicitation of resident and business input in reuse planning.
Georgetown Village Restoration, Inc. (GVR)	Nic Palazzo 203.544.3841 nicpalazzolandscapinginc.com	Represents residents and business in Georgetown Village
Historic Review Committee	Raymond D'Angelo, Chair	Advises on historical preservation and regulatory review.

2. b.iii. Incorporating Community Input (5 points)

The Town will continue to hold regular public meetings, publish information on the Town website and publish articles for the Redding Sentinel to update the community on the progress of the environmental assessment, remediation, and redevelopment planning. Monthly meetings of the Wire Mill Advisory Committee are open to the public, live streamed and recorded with minutes taken and posted to the Town website. The First Selectman hosts an informal monthly "Brown Bag" luncheon for public conversation on current Redding topics, which often includes a discussion about the Wire Mill. The Town website includes a dedicated page for the Wire Mill site that provides a repository for all reports and documents related to the site and the Town keeps residents updated through e-mailed weekly news updates, local media outlets, and on the Town's social media.

Community input from all sources (public workshops, letters to the Town boards and committees and the newspaper, Economic Development Committee outreach, Wire Mill Advisory Committee outreach and input) will be incorporated into the decision-making process for Wire Mill redevelopment planning.

3. **TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS (55 Points**

3. **a. Proposed Cleanup Plan (10 points)**

The proposed cleanup plan consists of hotspot excavation of all identified impacts above the CT DEEP Remediation Standard Regulations (RSRs) at the West Pond, OMS, and Gateway Areas. The areas requiring excavation will be further refined during the remedial design investigation, which will be completed as part of the preparation of the final Remedial Action Plan (RAP) for these areas. Based on the results and the proposed redevelopment plan for these areas, engineered controls (ECs) consisting of asphalt-pavement, clean fill materials, and other materials will be used to cap impacted soils which are above clean-up criteria in the RSRs. Use of ECs will require Environmental Use Restrictions (EURs) and ongoing maintenance and inspections. Details of the remedial approach and cleanup plan are provided in the attached Analysis of Brownfields Cleanup Alternatives (ABCA).

With respect to the Gateway and West Pond Areas, HBM abatement would be completed for the Main Office and former Machine Shop buildings. Given the dilapidated status of the Cafeteria and former residential dwelling in the West Pond Area, these buildings will be demolished under a Connecticut Department of Public Health (CTDPH) approved Alternative Work Practice (AWP) to allow for asbestos abatement variance. All demolition waste from the Cafeteria will be disposed of as mixed friable asbestos and PCB Bulk Product Waste.

3. **b. Description of Tasks/Activities and Outputs (25 points)**

TASK 1: PROGRAM MANAGEMENT (COOPERATIVE AGREEMENT OVERSIGHT)
i. Project Implementation: EPA-Funded: Travel expenses attend the biannual National Brownfields Conference; prepare quarterly reports for EPA and ACRES updates, and annual financial reporting. Non-EPA Funded: Town staff will provide project management and oversee the agreement including tracking project progress. Procurement of qualified environmental professional (QEP) and contractors and coordination/meetings with project partners.
ii. Anticipated Project Schedule: **(Months 1-36)** QEP procurement within 90 days of NTP, quarterly reports within 30 days after the reporting period; continuous ACRES updating and project tracking; annual conference attendance.
iii. Task/Activity Lead: Town Staff and Wire Mill Advisory Committee
iv. Outputs: QEP procurement; Quarterly reports; financial reports; ACRES updates; conference attendance; meeting minutes.
TASK 2: COMMUNITY OUTREACH & ENGAGEMENT
i. Project Implementation: EPA-Funded: Preparation of outreach materials including flyers, newspaper articles, and social media. Non-EPA Funded: Town staff and project partners will conduct community engagement and involve the local community in the decision making. Quarterly public meetings will be conducted to inform the community and solicit public input.
ii. Anticipated Project Schedule: **(Months 1-36)** Activities will begin within 30 days of NTP; bi-annual public meetings; continuous engagement outreach.
iii. Task/Activity Lead: Town Staff, Wire Mill Advisory Committee and Project Partners
iv. Outputs: Outreach materials; newspaper articles; social media updates; meeting presentations; public meetings; meeting minutes; sign-in sheets; public comments.
TASK 3: CLEANUP PLANNING
i. Project Implementation: EPA-Funded: Documents for cleanup implementation, including Analysis of Brownfield Cleanup Alternatives (ABCA), Quality Assurance Project Protocol (QAPP), abatement design technical specifications, and bid documents. Acquisition of the necessary permits and notifications to the CT Department of Public Health and CT DEEP. Develop cleanup plan for (a) West Pond to remediate former soil stockpile area (solid waste management unit), former underground storage tank location (area of concern); (b) develop soil remediation plan for the OMS Area; develop plans for HBM abatement and demolition of (c) residential building at West Pond Area, (d) Machine Shop addition; and HBM abatement plans for the (e) Machine Shop and (f) Administration buildings. The QEP will oversee the completion of these activities for the project. Non-EPA Funded: Town Staff and Advisory Committee will solicit bids and select the cleanup contractor, procurement and oversee the QEP activities.
ii. Anticipated Project Schedule: Remedial design investigation (months 0-3); finalize RAP, ABCA, and develop QAPP and bidding documents (months 3-6) and; permitting and approvals (months 6-12).

iii. Task/Activity Lead: QEP with coordination and oversight from Town Staff, Wire Mill Advisory Committee, and NVCOG Brownfield Program.
iv. Outputs: Outreach materials; newspaper articles; social media updates; meeting presentations; public meetings; meeting minutes; sign-in sheets; public comments.
TASK 4: CLEANUP ACTIVITIES
i. Project Implementation: EPA-Funded: QEP will oversee remedial activities as outlined in the ABCA (cleanup and disposal of contaminated soils and abatement and disposal of hazardous building materials) to be performed by licensed abatement and remediation contractors. Cleanup activities to include: Soil excavation, transportation, testing and disposal; regrading and site earthwork, and site preparation (a,b); visual observation and monitoring of demolition (c,d) and abatement and confirmatory air sampling to document proper abatement conditions (c,d,e,f). Licensed project monitors will oversee all abatement activities as required by the CT Department of Health. Cleanup activities at West Pond and OMS areas will be overseen by the QEP and a CT Licensed Environmental Professional (LEP). Non-EPA Funded: Town Staff and Wire Mill Advisory Committee will oversee progress and QEP activities.
ii. Anticipated Project Schedule: HBM Abatement (months 6 to 18); Soils Remediation (months 12-36)
iii. Task/Activity Lead: The QEP and Licensed abatement project monitors coordinated with Town Staff and the Wire Mill Advisory Committee.
iv. Outputs: Cleanup activities; manifests for proper disposal; abatement report.

3. c. Cost Estimates (15 points)

Task 1: Program management: $10,800 – 72 hours Engineer/Administrator average rate - $150/hr avg (per quarter est: 6 hrs EPA reporting/records management). Town staff hours will not be charged to the grant.
Travel: 2 trips to attend National Brownfield Conference: $2,700 (per trip: travel $600, 4 nights hotel $450, 4 days per diem and incidentals $300 lodging and M/I charges will be capped to CONUS rates)
Task 2: Community Outreach & Engagement: $6,000 (Facilitator: 4 facilitated meetings over 3 years x 10 hrs at $150/hr). Town staff time and consumables will not be charged to this grant.
Task 3: Cleanup Planning: Soil Remediation = $30,000 (Finalize ABCA [$5,000]; prepare QAPP [$5,000], prepare Remedial Action Plans [$10,000]; prepare bid documents [$5,000]; preparation of application for entry into the Abandoned Brownfield Cleanup Program [$5,000]). Cleanup Planning – Abatement and Demolition = $8,500 (prepare bid documents and abatement alternative work practices [$8,500]).
Task 4: Cleanup Activities: Contractual – Soil Remediation = $210,000 (soil remediation oversight [$33,000 = $1,100/day @ 30 days approx. based on an excavation volume of 150 tons/day approx.]; air monitoring [$12,000 = $2,000/week @ 6 weeks approx.]; laboratory analysis [$130,000 = 260 samples @ $500/sample approx.]; sampling equipment and mileage [$10,500 = $350/day @ 30 days]; project oversight and data evaluation [$14,500 = 116 hrs @ $125/hr approx.], Remedial Action Report [$10,000]). Construction – Soil Remediation = $900,000, apportioned to site areas as: West Pond – 40%, OMS Area – 49%, Gateway Area – 11%, (excavate/transport/disposal [$552,000 = 4,600 tons @ $120/ton approx.]; backfill [$345,000 = 4,600 tons @ $75/ton avg.]; site preparation/dust control/fencing [$3,000]). Contractual – Abatement and Demolition – $47,500 (abatement oversight with air monitoring [$33,000 = $1,100/day @ 30 days]; laboratory analysis [$2,450 = 245 samples @ $10/sample approx.]; sampling equipment and mileage [$2,400 = $80/day @ 30 days]; project oversight and data evaluation [$4,650 = 30 hrs @ $155/hr approx.], Abatement Closeout Report [$5,000]). Construction – HBM Abatement and Demolition Contractor = $775,500, apportioned to buildings as Main Office – 15%, Machine Shop – 63%, Demolition – 22%, ([1,735 lf pipe insulation x $50/lf = $86,750]; [10 cy of soil with thermal systems insulation x $1,000/cy = $10,000]; [3 boilers x $5,000/unit = $15,000]; [2 safes with assumed insulation x $250/unit = $500]; [1,165 sf floor tile and mastic x $10/sf = $11,650]; [2,800 sf of glue daubs x $6/sf = $16,800]; [960 sf cement board x $6/sf = $5,760]; [90 lf cement piping x $15/lf = $1,350]; [420 sf foundation mastic/waterproofing x $12/sf = $5,040]; [4,200 sf wood window glazing x $15/sf = $63,000]; [40 sf metal window glazing x $125/sf =

$5,000]; [10,490 sf roofing and siding panels x $4/sf = $41,960]; [4,100 sf exterior foundation waterproofing x $10/sf = $41,000]; [universal and other regulation building waste = $18,000]; [5,800 sf of demolition/abatement of cafeteria and former residential dwelling as mixed asbestos and PCB Bulk Product Waste x $12/sf = $69,600]; [350 tons of processing, transportation, and disposal of cafeteria and former residential dwelling waste (mixed asbestos and PCB Bulk Product Waste) x $315/ton = $110,250 [temporary barriers, sedimentation and erosion controls and backfill = $25,000]; [mobilization and general conditions = $30,000]; [Assumed PCB abatement within Machine Shop and Main Office at 30% of abatement costs for only these buildings = $115,500]; [15% approx. contingency abatement of unknown/unforeseen conditions (voids, plenums, subsurface, etc.) = $103,340).

	Task 1 Program Management	**Task 2** Community Engagement	**Task 3** Cleanup Planning	**Task 4** Cleanup Activities	**Total**
Travel	$ 2,700	$ -	$ -	$ -	**$ 2,700**
Contractual	$ 10,800	$ 6,000	$ 38,500	$ 257,500	**$ 312,800**
Construction	$ -	$ -	$ -	$ 1,675,500	**$ 1,675,500**
Total Direct	$ 13,500	$ 6,000	$ 38,500	$ 1,933,000	**$ 1,991,000**
Total Indirect	$ -	$ -	$ -	$ -	**$ -**
Total Federal (Direct + Indirect)	**$ 13,500**	**$ 6,000**	**$ 38,500**	**$ 1,933,000**	**$ 1,991,000**

3. d. Plan to Measure and Evaluate Environmental Progress and Results (5 points)
The Project Manager will review the schedule monthly to track project progress, adjust the schedule if needed, and will submit Quarterly progress reports to the EPA. The cleanup results will be documented to include amounts of contaminants removed from the site. Project progress will be updated in the ACRES database regularly. For each task, we will track the outputs, outcomes, and layout specific measures. For Task 1, we will document project progress in quarterly reports and ACRES updates; for Task 2, we will track information/outreach materials and report community outreach elements; for Task 3, we will track outputs including ABCA, QAPP, abatement specifications and bid documents and permits, and ensure we meet the deadlines as outlines in the workplan; for Task 4, we will track the outcomes in soil remediation and hazardous building materials abatement and evaluate achievement of cleanup standards.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (30 Points)

4. a. Programmatic Capability (15 points)

4.a.i. Organizational Structure (5 points)
The Office of the First Selectwoman Julia Pemberton will provide general oversight for this grant along with the **Gilbert & Bennett Wire Mill Advisory Committee** which will oversee the scope of work, schedule and subcontractor selection and performance in coordination with the **Naugatuck Valley Council of Governments Brownfield Program** who will provide technical assistance. Professional staff from Town offices will be assigned by the First Selectwoman to perform contract compliance and administrative duties and ensure that the site work complies with zoning, conservation, building and health regulations.

4.a.ii. Description of Key Staff (5 points)
Julia Pemberton, Redding First Selectperson, Redding's CEO for the past 10 years, was responsible for the Town's acquisition of the Wire Mill site and has been instrumental in planning site remediation and reuse. **Jim Sanders, Redding Finance Director,** will serve as the Contract Administrator and oversee grant administration and compliance with regulatory filings. Prior to becoming Finance Director in 2022, Jim had a 30-year career as a finance executive leading business units at IBM. Jim has extensive knowledge of financial planning, accounting, expense management and internal controls. The Finance office has been recognized with Certificates of Excellence for financial reporting for its Comprehensive Annual Financial reports. **Aimee Pardee, Redding Land Use Officer,** will serve as the Project Manager,

responsible for overseeing project schedule, submission of project reports to EPA, regulatory filings and ensuring compliance with land use regulations for site work. Aimee has 30 years of experience in land use: planning, zoning, wetlands, and conservation enforcement. Shaun Donnelly, Redding Chief Building Official and Facilities Director, will provide oversight of HBM abatement and building demolition. Chris Wegrzyn, Redding Health Officer, will provide oversight of health monitoring during construction. Amy Atamian, Chairperson of the Wire Mill Advisory Committee and Water Pollution Control Commission will support program oversight and coordinate public outreach. Amy has over 30 years of experience in the environmental field as a project manager and data analyst, having worked on significant RCRA projects. As a Zoning Commissioner, Amy participated in the review and approval of the prior development plans for the Wire Mill site.

4.a.iii. Acquiring Additional Resources (5 points)

The Town of Redding 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. Redding will hire a QEP/CTDEP-approved LEP to generate required cleanup plans and oversee remedial actions. Bid requests and RFPs will be published in local newspapers and on the state procurement website 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 technical, legal or construction support that may be needed. The Town is a member of the Naugatuck Valley Council of Governments Brownfield Program and works in conjunction with the Wire Mill Advisory Committee comprising subject area experts and representatives from the Economic Development Committee, Georgetown Village Restoration, and Town Boards and Commissions. Prevailing wage (CGS Section 31-53), and other Federal, state, and local laws regarding the procurement of contractors to conduct the cleanup will be followed.

4.b. Past Performance and Accomplishments (15 points)

4.b.i. Currently Has or Previously Received an EPA Brownfields Grant (15 points): N/A

4.b.ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (15 points)

(1) Purpose and Accomplishments (5 points)

The Town has successfully completed 90% of a 2021 Brownfield Assessment grant from the DECD to support environmental investigations at the Wire Mill property. Under this grant, LEP services were procured to perform a Phase I Environmental Site Assessment and supplemental studies. Town staff were responsible for financial tracking and contract compliance. The Wire Mill Advisory Committee managed the technical oversight of work performed by the LEP. The Committee held monthly progress meetings open to the public, provided status updates to Boards and Commissions, and coordinated two public update meetings. LEP reports provided data for the Committee to develop a phased redevelopment vision with near-term recommendations which were presented at public meetings of the Boards of Selectmen and Finance, which will serve to guide budget decisions supporting the site in FY24.

(2) Compliance with Grant Requirements (10 points)

Under the 2021 Assessment grant from DEDC, Tighe & Bond (T&B) was contracted to complete a Phase I ESA, recommend, and conduct supplemental studies to identify data gaps, and refine the understanding of site conditions to begin remediation planning. T&B produced all reports on time, withing scope and budget. During their investigations, T&B identified areas of the site that were not sufficiently sampled under the 2007 RAP, requiring a change order to include a limited Phase II/III sampling program. The sampling program required a delay in the cost estimating task which has now been completed. CT DEEP has acknowledged receipt of the reports documenting the site's environmental conditions. In addition to the environmental assessment reports, T&B performed condition and HBM surveys of building structures and a safety survey of the site. DEEP has concluded that there is a sufficient level of site characterization from the work performed to date for remediation work to begin at the site.

4. b.iii. Never Received Any Type of Federal or Non-Federal Assistance Agreements (8 points): NA.

THRESHOLD CRITERIA

FY24 EPA Cleanup Grant Application

Response to Threshold Criteria

1. Applicant Eligibility

The Town of Redding is an eligible entity for the U.S. Environmental Protection Agency's Brownfield Cleanup Grant as a "General Purpose Unit of Local Government" under 2 CFR § 200.64.

2. Previously Awarded Cleanup Grants

The Town of Redding affirms that the proposed Site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The Town of Redding affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Town of Redding is the sole owner of the 44-acre property, which comprises three tax parcels: 20 North Main St., 30 North Main St., and 50 Bennett St. Ownership is in fee simple title. The Town of Redding began a tax foreclosure proceeding with respect to the property in 2015 and took title to the property on February 16, 2021.The subjects of this grant application are the portions of 20 North Main St. known as the West Pond and Gateway Areas, and 50 Bennett St. known as the OMS Area. The Town of Redding will retain ownership of the Site for the duration of the time in which Brownfield Cleanup Grant funds are disbursed for the cleanup of the Site.

5. Basic Site Information

a. Site Name: Former Gilbert & Bennett Wire Mill Manufacturing Company (G&B)
b. Site Address: 20 North Main St. Redding CT, 06896 (primary address)
c. Current Owner: Town of Redding, Connecticut

6. Status and History of Contamination at the Site

a. Contamination Type: The site is contaminated with hazardous materials and petroleum products from former factory operations conducted between 1818-1989. These operations produced byproducts such as waste acids, alkalis, solvents, oils, paints, lead and zinc galvanizing wastes, skimmings/dross, and metal hydroxide sludge. During factory operations, the metal hydroxide sludge was placed in a surface impoundment area on an adjacent parcel (15 North Main St.) downgradient of the target site which was the subject of USEPA RCRA (Subtitle C) remedial action in 2001 (EPA ID CTD001162775). 15 North Main St. is a separate property not owned by the Town and not part of this grant application.

b. Operational History and Current Uses: G&B operated as a wire mill from 1818-1989 and produced metal fencing, insect screening, sieves, outdoor furniture, animal cages, reinforcing mesh for concrete and a variety of other metal products. The primary operations included:
   - Rod Cleaning: Until 1986, scale was removed from iron rods by rinsing them in acid baths, followed by water rinses and coating with lime, borax, or copper sulfate. After 1986, scale was removed mechanically.

- Rod Drawing: Steel rod was drawn through a series of round dies to produce coarse and fine wire. Soaps and animal fat were used to reduce friction in this process.
- Annealing: Wire was annealed to make the metal more malleable. Coarse wire was annealed in molten lead baths. Fine wire was annealed using direct flame heaters.
- Galvanizing: Prior to galvanizing, wire was run through an acid bath, a water rinse, and a flux bath primer. The wire was then pulled through a molten zinc bath, followed by a water quench. The wire was then coated with a water-soluble oil.
- Fabrication: Fabrication included the bending, twisting, and/or welding of wire.
- Final steps in the fabrication process included painting, lacquering, or vinyl coating.

Manufacturing operations ceased in July 1989. G&B continued to operate administrative office functions from the site until filing for bankruptcy in 1998. In October 2002, Georgetown Land Development Corporation (GLDC) purchased most of the former manufacturing property and American Restoration Resources, Inc. (now Georgetown Redevelopment Corporation), purchased the four-acre parcel containing the surface impoundment area in 2002.

GLDC developed a master plan for the site as a transit-oriented walkable downtown mixed-use village, performed environmental site investigations, developed remedial action plans, performed limited soil remediation, and began hazardous building material (HBM) abatement and removal of non-historical buildings.

In 2008 GLDC became insolvent and was unable to secure new capital investment to advance the project. In 2011, GLDC sold a portion of its property to JP Industrial Park, LLC. GLDC was unable to conduct the planned remedial actions, HBM abatement or stabilization of the remaining historic brick and masonry factory buildings.

The Town of Redding instituted tax foreclosure proceedings with respect to the 44-acre GLDC property in 2015 and acquired the title to the property on February 16, 2021 and intends to remediate the site in preparation for redevelopment.

Currently, the remaining factory buildings are unoccupied except for the Machine Shop, which houses National Park Service operations for Weir Farm and the Main Office Building with offices and a conference room. Areas of the site are used to store dry goods, new car inventory for a Nissan dealership, and by landscapers and a tree service for storing landscape materials, wood, and equipment.

c. Environmental Concerns: elevated metals above and below regulatory criteria were noted throughout the three subject areas and attributed to possible historical fill material and/or atmospheric deposition from historical manufacturing activities. Petroleum impacts and SVOCs (mainly polycyclic aromatic hydrocarbons [PAHs]) above regulatory criteria were identified in the West Pond Area with a few PAHs above regulatory criteria noted at the Gateway Area. Asbestos containing materials including pipe insulation, flooring, cement boards, boiler components, foundation and façade coatings, roofing and ceiling materials were observed in the Machine Shop and Main Office as were potential presence of lead and PCBs in paint, caulking, and exterior elastomeric coating materials.

d. How the site became contaminated: site contamination occurred during the period of manufacturing operations between 1818 and 1989 directly through product manufacturing operations, limited manufactured gas operations, raw material storage, historical fill materials, groundwater infiltration, and air deposition from manufacturing processes.
e. Nature and Extent of contamination: contamination was identified throughout the site and is concentrated within the central portion of the former Wire Mill where manufacturing processes were primarily completed. Contamination identified within the three subject areas appears to be sporadic and typical of fill material and/or atmospheric deposition, although certain impacts identified were attributed to other sources including former underground storage tanks, deterioration of lead-based paint on former structures, and impacts associated with the railroad. Further evaluation of these impacts will be completed as part of the preparation of a Remedial Action Plan (RAP).

7. Brownfields Site Definition

The Town of Redding affirms that the Site meets the definition of a brownfield under CERCLA § 101(39) as described in the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k). The Town of Redding affirms that the Site:

a. Is not listed (or proposed for listing) on the National Priorities List (NPL).
b. 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. Is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

The site has been the subject of multiple environmental investigations and ongoing remediation dating back to the 1980s, when the EPA ordered G&B to perform certain remedial activities. GLDC continued corrective activities after it acquired the site. CT DEEP approved a Remedial Action Plan, dated 2007, prepared by Fuss & O'Neill.

Utilizing a 2021 DECD Assessment Grant obtained by the Town, Tighe & Bond conducted a Phase I Environmental Site Assessment and supplemental studies including: a data gap analysis (DGA), HBM survey, building structural evaluation, and river wall evaluation. The following reports were completed under this grant and provided to CT DEEP:

- Phase I Site Assessment (ESA), Tighe & Bond, Inc., dated June 2023
- Environmental Data Gap Analysis Report, Tighe & Bond, Inc., June 2023
- Hazardous Building Materials Data Gap Analysis Report, Tighe & Bond, Inc., June 2023
- Summary of Phase II Findings Memorandum, Tighe & Bond, Inc., October 12, 2023

The supplemental studies have identified 11 additional AOCs. Tighe & Bond conducted Phase II and limited Phase III investigations from July through August of 2023 to address data gaps associated with the West Pond and North Mill Areas and has developed a draft Analysis of Brownfield Cleanup Alternatives (ABCA) and opinions of probable costs for remediation and HBM abatement of priority areas of the site. The Town received a second DECD grant in 2023 that will be used to perform any additional sampling required to complete site characterization, refine the remediation scope, develop a final ABCA and remedial action plan for the entire site.

9. Site Characterization

b. Applicant other than a State or Tribal Environmental Authority eligible to be enrolled in a voluntary response program

A letter from Meena Mortazavi, Interim Brownfield Coordinator from CT DEEP dated November 1, 2023, is attached certifying the following for the FY24 EPA Brownfield Cleanup Grant:

i. The site is eligible to be enrolled in the Voluntary Remediation Program pursuant to CGS §22a-133x and may also be eligible for the Brownfields Remediation and Revitalization Program pursuant to CGS §22a-133x.
ii. The Town intends to enroll the site in one of these programs if EPA awards cleanup funds.
iii. DEEP concluded there is a sufficient level of site characterization from the ESA and additional Data Gap Analysis Reports performed to date for the remediation work to begin at the Site.

10. Enforcement or Other Actions

The Town of Redding affirms there are no ongoing or anticipated environmental enforcement or other actions related to the Site.

11. Sites Requiring a Property-Specific Determination

The Town of Redding affirms the Site does not require a property-specific determination because there are no planned or ongoing removal actions under CERCLA; no unilateral administrative order, court order or administrative order on consent has been issued or entered into.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes: N/A
(2) Alaska Native Village Corporations & Alaska Native Regional Corporations: N/A
(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

a. Describe in detail the circumstances under which the property was acquired.
The Town of Redding acquired the property through municipal foreclosure of tax liens, which is an exemption from the definition of "transfer of establishment" in the Property Transfer Act.
b. Provide the date on which the property was acquired.
The Town of Redding acquired the property on February 16, 2021.
c. Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.
The applicant is a municipality and has no direct or related liability for contamination of the property. Prior to taking title to the property the Town of Redding entered the property into the State of Connecticut Department of Energy and Environmental Protection Municipal Brownfields Liability Relief (MBLR) Program pursuant to Section 22a-133ii of the Connecticut General Statutes (CGS). The Town is exempt from liability under CERCLA Section 101 (20)(D).
d. Affirm that you have not caused or contributed to any release of hazardous substances at the site.

The Town of Redding affirms it has not caused or contributed to any release of hazardous substances at the Site.

e. Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the site.
The Town of Redding affirms that it has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the Site.

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002: N/A

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection: N/A

b. Property Ownership Eligibility – Petroleum Sites

Current and past owners and site acquisition: The Town of Redding is the current owner of the site, acquiring the property through municipal foreclosure of tax liens against the Georgetown Land Development Company (GLDC) and JP Industrial Park LLC on February 16, 2021.

State designation as a combination of hazardous substances and/or petroleum: The Town of Redding requested a brownfield acknowledgement letter from the CT DEEP on October 16, 2023. A letter from Meena Mortazavi, Interim Brownfield Coordinator from CT DEEP dated November 1, 2023, is attached stating that the subject property is contaminated with both hazardous substances and/or petroleum products.

Manufacturing Operations at the site: The site is the location of the former Gilbert & Bennett Wire Mill Manufacturing Company. Gilbert & Bennett operated a wire mill at the site from 1818 through 1989 and produced metal fencing, insect screening, sieves, outdoor furniture, animal cages, reinforcing mesh for concrete, and a variety of other metal products. Manufacturing operations ceased in July 1989. Gilbert & Bennett continued to operate administrative office functions from the site until filing for bankruptcy in 1998.

Redevelopment and Remediation: In October 2002, Georgetown Land Development Corporation (GLDC) purchased most of the former manufacturing property and developed a master plan for the site as a transit-oriented walkable downtown mixed-use village, performed environmental site investigations, developed remedial action plans, performed limited soil remediation, and began hazardous building material (HBM) abatement and removal of non-historical buildings. In 2008, GLDC became insolvent and was unable to secure new capital investment to advance the project.

Previous remediation/cleanup activities involving petroleum products at the site have included the following:

- Underground Storage Tank (UST) Removal – By 1992, 15 USTs were removed from the site or abandoned.
- Aboveground Storage Tank (AST) Removal – By 1990, two ASTs were removed from the site.
- Hazardous Waste Removal – By 1990, all drummed hazardous wastes had been removed from the manufacturing area.
- Container Storage Area Closure – Eight less than 90-day hazardous waste storage areas were closed. This included removal of more than 340 hazardous waste drums and decontamination of the storage areas. The closure did not address subsurface soils.
- Interim Corrective Measures (ICMs) – ICMs were completed at a former soil stockpile (SWMU-5) and former soluble oil sump pump (AOC-1). At SWMU-5, impacted soils were removed and disposed off-site. At AOC-1, petroleum-impacted water and soil were removed and the sump was cleaned and closed.

Recent data gap analyses performed by Tighe & Bond conducted in 2022-2023 on behalf of the Town of Redding have identified localized areas of soil contamination and two areas previously used by Gilbert & Bennett to produce manufactured gas from coal.

Affirmation regarding the disposal of petroleum substances at the site.
The Town of Redding affirms that it has not, at any time, dispensed or disposed of petroleum or petroleum product contamination, or exacerbated the existing petroleum contamination at the site, and has not owned the site when any dispensing or disposal of petroleum (by others) took place, and has taken reasonable steps regarding contamination at the site.

13. Cleanup Authority and Oversight Structure

a. **Cleanup Oversight**:

The Town of Redding intends to enter the property into the Abandoned Brownfield Cleanup Program. The property will be remediated according to CT Remediation Standard Regulations (RSRs) of the Regulations of Connecticut State Agencies (RCSA), and the Town will comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment. The Town 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 and the state procurement website in compliance with local, state, and federal laws, and competitive procurement provisions of 2 CFR §§ 200.317 through 200.327. 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. Additionally, the Town of Redding will consult with EPA to ensure the cleanup is protective of human health and the environment.

Soil remediation and abatement of contaminated building materials will be conducted by a competitively procured, appropriately licensed remedial contractor pursuant to CT Remediation Standard Regulations 9RSRs 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 coordinate with the Connecticut Department of Public Health (CT DPH) and will be conducted in accordance with CT DPH rules and regulations.

Cleanup Response Activities: The site is accessible by bordering public roads, and the site is owned by the Town of Redding. No adjacent property access is needed. Communications and outreach will be ongoing, notifying neighboring property owners and the greater Georgetown neighborhood to cleanup efforts and project status. Air monitoring will be conducted along the perimeter of the site during soil remediation. During the HBM abatement, access to a local daycare facility may be desirable to monitor air quality at this site. If deemed necessary, the Town Health Officer will contact the daycare facility management to review the abatement process and duration and will request access to a portion of the site to setup and manage a temporary air monitoring station for the duration of the abatement.

14. Community Notification

a. Draft Applications

The Town of Redding provided the community an opportunity to review and comment on the draft application and draft ABCA beginning on October 26, 2023, through November 2, 2023. If the application is selected for funding, the Town will finalize the ABCA and make it available for additional public review and comment as part of pre-cleanup activities.

b. Community Notification Ad

The Town of Redding notified the community of its intent to apply for an EPA Brownfield Cleanup Grant through a Legal Notice published with the Town Clerk's office and posted to the Town Website (townofreddingct.org) and on the Town's official Facebook page on October 19, 2023, and published in the Redding Sentinel (Redding's weekly newspaper) on October 26, 2023. Content of the notice clearly stated: a copy of the grant application and draft Analysis of Brownfields Cleanup Alternatives (ABCA) was available for review and public comments, where the draft application was located, and the date, time, and location of the public meeting.

c. Public Meeting

A Public meeting was held on October 30, 2023, at 7:30 pm in the Redding Town Hall conference room. The draft application and ABCA were presented, and the Town solicited comments and questions from community members. The community demonstrated full support and enthusiasm for the project. From the meeting, the Town has included: a summary of the public comments received, the Town's response to those comments, meeting notes, and meeting sign-in participant list.

d. Submission of Community Notification Documents

- A copy of the draft ABCA,

- A copy of the newspaper ad 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,
- A copy of the social media posting that demonstrates solicitation for comments on the application,
- Summary of comments received,
- The Town's response to those comments,
- Meeting notes, and
- Meeting sign-in participant list.

15. Contractors and Named Subrecipients

Not applicable