



R01-24-C-003

**Narrative Information Sheet for Cleanup Grant  
EPA-OLEM-OBLR-23-15  
CFDA 66.818  
51-53 South Colony Street, Meriden, Connecticut 06450**

1. Applicant Identification:  
City of Meriden, 142 East Main Street, Meriden, Connecticut 06450
2. Funding Requested:
  - a. Grant Type: Single Site Cleanup
  - b. Federal Funds Requested: \$975,240
3. Location:
  - a. City: Meriden
  - b. County: New Haven
  - c. Connecticut
4. Property Information:  
51-53 South Colony Street, Meriden, CT 06450, Map/Lot: 0109-0044-0058-0000
5. Contacts:
  - a. Project Director  
Joseph Feest, Economic Development Director  
Mailing Address: City of Meriden, City Hall, 142 East Main Street, Meriden,  
CT 06450  
Tel: 203-630-4152  
Email: [jfeest@meridenct.gov](mailto:jfeest@meridenct.gov)
  - b. Chief Executive Officer  
Chief Roberto Rosado, Acting City Manager  
Mailing Address: City of Meriden, City Hall, 142 East Main Street, Meriden,  
CT 06450  
Tel: 203-630-6300  
Email: [rrosado@meridenct.gov](mailto:rrosado@meridenct.gov)
6. Population:  
City of Meriden Population: 60,850 (U.S. Census Bureau 2020 Census)

7. Other Factors Checklist

<b>Other Factors</b>	<b>Page #</b>
Community population is 10,000 or less.	N/A
The applicant is, or will assist, a federally recognized Indian Tribe or United States Territory.	N/A
The proposed brownfield site(s) is impacted by mine-scarred land.	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	Page 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)	Page 1
The proposed site(s) is in a federally designated flood plain	Page 2
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Page 2
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Page 6
The proposed project will improve local climate adaptation/mitigation capacity and resilience to protect residents and community investments.	Page 2
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.	N/A

8. Releasing Copies of Applications:  
Not Applicable

# 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

## 1.a. Target Area and Brownfields

*1.a.i. Overview of Brownfield Challenges and Description of Target Area:* The City of Meriden was originally established as an agricultural community in the mid 1600's. Due to its convenient location and connection to other major commercial areas, it quickly became a key transportation and manufacturing center. In the 1800's, a flood of manufacturing facilities took root in the City and it became famous for the production of fine metal goods, resulting in recognition as the "Silver City". Meriden's manufacturing heyday drastically subsided in the mid 1900's with closure of many manufacturing facilities, leaving a wake of unused buildings and contamination. The industrialized urban core of the City was most impacted, resulting in the creation of hundreds of brownfield sites and blight. The target area, which includes dense multifamily developments (home to 7,413 primarily low income and minority residents) and industrial, manufacturing, and commercial properties consists of four census tracts in the urban core (171000, 170900, 170200, 170100), is centered around the brownfield cleanup site located at the intersection point of the four tracts and is ground zero for Meriden's brownfield challenges. Manufacturing disinvestment and brownfields in the target area caused additional economic regression in a vicious cycle of decay. Historic development, wetlands manipulation, and filling, coupled with climate change have also resulted in substantial flooding issues around Harbor Brook, which borders the cleanup site and bisects the target area.

For 20 years, the City has invested incredible capital and energy into revitalization of the target area to begin to reverse the combined effects of the financial, environmental, and ecological injuries. The target area includes several mixed use/mixed income brownfield success stories which have come as a result of the City's diligence in pressing cleanups. However, significant challenges persist in the target area, including dozens of vacant and underutilized contaminated properties, persistent poverty, flooding challenges, and lack of opportunity. The infusion of brownfield funding at the cleanup site is a keystone to the successful rebirth of the target area.

*1.a.ii. Description of the Proposed Brownfield Site:* The cleanup site is a 0.33-acre vacant former industrial property located at 51-53 South Colony Street, in the heart of the target area, and on the banks of Harbor Brook. It is surrounded by multi-family housing, a railroad, commercial structures, and vacant parcels. Site redevelopment is a key community priority due to the blighting effect on the surrounding neighborhood. The proximity of Harbor Brook, the floodplain, and the environmental contamination has made site reuse impossible without public investment of brownfields funds.

Initial development of the site in the late 1800's resulted in placing of contaminated fill in low lying areas and manipulation and narrowing of the Harbor Brook channel. Operation of the site for a hundred years added to the environmental issues, including soil contamination and use of a petroleum underground storage tank (UST). Prior uses on the site included coal fired electricity generation, a welding facility, and retail and commercial uses until 2012. The presence of the foundation of the former building impedes flow in Harbor Brook, causing a hydraulic choke-point in the river, resulting in persistent flooding throughout the target area.

The City completed Phase I and Phase II environmental assessments, which delineated multiple issues at the site, including the UST, petroleum-impacted soil, and contaminated fill. Soil contains petroleum, metals, and PAH at concentrations exceeding state cleanup standards. The

UST was estimated to be up to 3,000 gallons in size, and approximately 1,800 tons of soil requires excavation and disposal. Following acquisition by eminent domain in 2012, the City secured the site, abated hazardous building materials, and demolished the existing structures down to the street level. However, the 2,400 ft<sup>2</sup> concrete building foundation, the UST, and contaminated soil remain in place. The remaining foundations, including 1,350 tons of concrete, require removal to facilitate access to the contaminated soil and the UST. The cleanup will remove the potential risks to human health and welfare, allow the City to continue construction of the ongoing Harbor Brook Flood Control plan at and adjacent to the site, and enable the installation of a planned greenway linear trail along the river as a public amenity.

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

*1.b.i. Reuse Strategy and Alignment with Revitalization Plans:* The City has a clear and detailed reuse strategy for the site. Once remediated, the site will be repurposed for flood control, open space, and a public greenway trail, and is a keystone property to the Harbor Brook Flood Control plan which is a multi-decade initiative to restore Harbor Brook in the target area to a more natural condition by removing sources of contamination and flow obstacles (obstructions/culverts/bridges), remediating and restoring wetland areas for flood storage, and dechannelization with nature-based solutions. The reuse strategy is aligned with the fact that the site is located entirely in the federally designated floodplain, and other City land use and revitalization plans that seek to improve quality of life, enhance public health and welfare, provide open space for active use, and mitigate continued flood damage and economic hardships to residential and commercial properties in the target area. In addition to the direct and indirect benefits to health and welfare from site cleanup, the reuse strategy will protect over 200 properties, jobs, and homes of underserved populations in the target area from future flooding. The site reuse strategy is also consistent with several long-term plans, including the City's 2020 Plan of Conservation and Development, and the Choice Neighborhood Plan, which engaged over 200 residents and stakeholders in the target area. Each of these plans incorporated significant participation of our project partners to engage in constructive dialogue about challenges and solutions at the site and the target area.

*1.b.ii. Outcomes and Benefits of Reuse Strategy:* The implementation of the site cleanup and reuse strategy will stimulate economic development by removing blight and mitigating persistent flooding throughout the target area which has caused devastating financial impact to business, residents, and property owners. The risks and costs from repeated flooding events and the associated elevated flood insurance premiums has been a substantial impediment to investment and economic development in the target area. The project will also provide new public open space and establish a key link between previously completed sections of the linear greenway trail along Harbor Brook by adding 300 linear feet of new public access greenway trail that connects to 2.5 miles of finished sections to the north and south of the site. The cleanup and reuse strategy has been specifically designed to incorporate strategies to mitigate climate vulnerabilities, including reducing flood risk in the target area caused by climate change driven precipitation intensity by removing fill from the floodplain to provide flood storage capacity at the site, and reducing erosion of contaminated soil into the river. The public greenway trail will incorporate green products and efficient solar lighting.

### 1.c. Strategy for Leveraging Resources

*1.c.i Resources Needed for Site Characterization:* The City has already invested significant funds to advance the site characterization. No additional resources are needed, and we are ready to initiate the cleanup and reuse strategy.

*1.c.ii Resources Needed for Site Remediation:* Based on a detailed Opinion of Cost provided by our engineering design team for the cleanup, the funding requested in this application is sufficient to complete the remediation.

*1.c.iii Resources Needed for Site Reuse:* The implementation of the site reuse strategy is a substantial multiphase project involving remediation, flood resiliency measures and a linear greenway at the site and adjacent properties. Secured commitments of leveraged funding are included below, with documentation attached.

Source	Details	Status	Amount
CT State Bond Commission	Columbus Ave. bridge at Harbor Brook	Secured	\$1.3M
CT State Bond Commission	Harbor Brook channel flood resiliency	Secured	\$6.99M
CT Local Bridge Program	Cooper St. bridge at Harbor Brook	Secured	\$2.5M
FEMA BRIC Grant	Harbor Brook channel flood resiliency	Secured	\$11.17M
FEMA HMPG Grant	Harbor Brook channel flood resiliency	Secured	\$2.46M
CT LOTPIC Grant	Cedar St. bridge at Harbor Brook	Secured	\$4.7M

*1.c.iv. Use of Existing Infrastructure:* The cleanup will facilitate the use of existing infrastructure within the target area, adjacent to the site, including 2.5 miles of linear greenway trail to the north and south that will be connected through the site as part of the site reuse strategy. Cleanup of the site will eliminate blight in proximity to prior investments in infrastructure, housing, and streetscapes.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

### 2.a. Community Need

*2.a.i. The Community's Need for Funding:* Meriden is a low-income community and is a state-designated "Distressed Municipality" that ranks in the top 12% in the state on an index which considers income, poverty, unemployment, aged housing stock, and other indicators. The City has no internal financial capacity to fund cleanups to catalyze economic opportunity. The median household income of Meriden (\$59,792) is almost 30% lower than that of the rest of the State (\$83,572), and 13% lower than the nation (\$69,021). Additionally, 13.6% of the population lives under the poverty level, compared to 10% for the State and 12.6% nationally. Municipal tax revenue is significantly limited since the median value of owner-occupied housing (\$175,700) lags substantially behind the State (\$286,700) and the nation (\$244,900). This income, poverty, and property value gap directly affects the City's ability to generate revenue to invest in brownfield cleanups and redevelopment to spur economic and social improvements. Because the site and a large portion of the target area is located in the 100-year floodplain, there are limited sources of funding to carry out the needed cleanup and subsequent reuse. This brownfield grant is indispensable to further cleanup and redevelopment at the site and in the target area.

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

*2.a.ii(1) Health or Welfare of Sensitive Populations:* The census tract in which the cleanup site is located (170100), as well as all four tracts that make up the target area, are disadvantaged according to CEJST, and classified as low income. Tract 170100 is disadvantaged due to factors including low income (90<sup>th</sup> %), energy cost (92<sup>nd</sup> %), asthma (96<sup>th</sup> %), housing cost (93<sup>rd</sup> %), lack of greenspace (93<sup>rd</sup> %), and proximity to hazardous waste facilities (93<sup>rd</sup> %). The target area is home to a disproportionate density of sensitive populations, including low-income minority residents. Approximately 18% of the residents in the immediate vicinity of the cleanup site (tract 170100) are living below the poverty line and designated as low income with a median household income of \$34,900. According to EJScreen statewide data, target area residents include populations that are low income (93<sup>rd</sup> %), limited English speaking (96<sup>th</sup> %), have less than a high school education (93<sup>rd</sup> %), are exposed to toxic releases to air (98<sup>th</sup> %), and live close to contaminant sources like those at the cleanup site including USTs (96<sup>th</sup> %). The health risks and welfare issues faced by the residents are significantly exacerbated by the blight and disinvestment caused by brownfield sites. The site reuse strategy will reduce threats to the health and welfare of these sensitive populations by removing hazardous materials from the site, eliminating health risks from contamination and flooding, and enhance community wellness by providing open space and opportunity for recreation and exercise on the linear greenway trail.

### *2.a.ii. (2) Greater Than Normal Incidence of Disease and Adverse Health Conditions:*

According to EJScreen, residents of the target area are disproportionately exposed to environmental and socioeconomic stressors and exhibit greater than normal incidents of health conditions. **Asthma:** Target area residents are exposed to air pollution as indicated by the following statewide EJ Indices: 97<sup>th</sup> % Toxic Releases to Air, 90<sup>th</sup> % Ozone, 90<sup>th</sup> % Particulate Matter, and 92<sup>nd</sup> % Traffic Proximity, all of which are asthma risk factors. As a result, target area residents exhibit a significantly elevated asthma prevalence (89<sup>th</sup> % state). **Lead:** Exposure to lead in soil and paint is widely documented to cause birth defects, disabilities, and long term health complications. The EJ Index for Lead Paint indicates the target area is in the 90<sup>th</sup> %ile. The risk of exposure to lead paint is exacerbated for Meriden residents due to the age of the housing stock. In the City, there are over 21,000 housing units built before 1980, over 1,200 of which have children present. The Meriden Health Department provided lead testing results from 2019-2020 reporting that of 153 lead screenings, 41 children reported elevated blood lead levels. **Cancer:** The National Cancer Institute recognizes New Haven County (in which Meriden is located) as having the highest cancer rate in the state, and Susan G. Komen data shows Meriden is one of six urban centers in Connecticut with high rates of late-stage breast cancer. The proposed site cleanup will reduce threats caused by contaminated fill, volatile compounds, petroleum, and water damage from flooding to sensitive populations in the target area that already have greater than normal incidences of asthma, cancer, and blood lead levels.

### *2.a.ii.(3) Environmental Justice*

*2.a.ii.(3) a Identification of Environmental Justice Issues:* According to CEJST, the cleanup site and the three adjacent census tracts that comprise the target area are all designated as disadvantaged. Residents in these underserved communities are suffering the consequences of environmental justice issues including disproportionate incidence of low income, poverty, limited English fluency, minority populations, and limited high school equivalency, coupled with the negative environmental impacts from historic development and social decisions

(disproportionate target area disinvestment, proximity to contaminated properties, diversion of funding and opportunities, blight, air emissions, and traffic proximity). Alarming, for 35 of the 48 primary environmental justice indices presented by EJScreen, the target area ranks higher than 80<sup>th</sup>% at the state or national level. Significant examples include a population that is low income (93<sup>rd</sup>%), limited English speaking (96<sup>th</sup>%), has less than a high school education (93<sup>rd</sup>%), is exposed to toxic releases to air (98<sup>th</sup>%), and lives close to contaminant sources like the cleanup site including USTs (96<sup>th</sup>%), compared to statewide data.

*2.a.ii.(3) b Advancing Environmental Justice:* Cleanup and implementation of the reuse strategy will promote environmental justice in the target area by 1) removing blight signaling investment in this disadvantaged community, 2) improving health outcomes by removing a contaminant source, 3) mitigating flood impacts impacting target area residents and businesses, 4) facilitating the development of a new green space for recreation, and 5) providing a greenway trail connecting nearby completed trail segments within the target area providing opportunity for recreation, exercise, and connectivity and transportation for those without access to an automobile. The benefits of these improvements made possible by federal funding will directly affect disadvantaged community residents as described by the Justice 40 Initiative. No displacement will occur because the site is vacant.

**2.b. Community Engagement**

*2.b.i. Project Involvement and 2.b.ii Project Roles:* The City constantly and proactively engages with many different groups in the community regarding brownfield site reuse planning and implementing of public improvement projects. In addition to the general public, municipal and local stakeholders, advocacy groups, and other community and business based organizations providing resources, the project partners listed below are formally engaged to provide meaningful support.

<b>Organization</b>	<b>Point of Contact</b>	<b>Specific Involvement</b>
Meriden Council of Neighborhoods (Community Based)	Holly Wills [REDACTED]	Engage residents by disseminating information to their individual neighborhood groups and solicit feedback, and provide an organized and efficient data collection system with a designated point of contact to the City to make sure the voices of the residents are acted upon.
Midstate Chamber of Commerce (Business Based)	Rosanne Ford r.ford@midstatechamber.com	As a liaison, the Chamber will engage with the business community by providing information about the project in its monthly newsletter and by organizing community meetings with feedback to the City.
Meriden Flood Control Implementation Agency (Municipal)	Michael Rohde [REDACTED]	The FCIA will keep city residents informed of the project through public meetings providing information on the cleanup. FCIA facilitates funding and administrative components of the flood control plan.
Meriden Land Trust (Community Based)	Harmony Scaglione meridenlandtrust@gmail.com	The passionate members of the Land Trust will help keep residents informed and engaged in the project and advocate for the ongoing funding, expansion, use, and upkeep of the resulting open space/linear trail.

Meriden Business Investment and Growth Program (Business Organization)	Joseph Feest JFeest@meridenct.gov	“Meriden Biz” is an umbrella that connects residents, businesses, EDCs, and job seekers by linking 9 organizations invested in improving the City. They will provide access and support from their members for continued project advancement and funding.
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*2.b.iii. Incorporating Community Input:* The City will routinely communicate project progress and aggressively solicit meaningful input from the community in a multifaceted communication strategy. A Community Engagement Plan consisting of partner organizations, schedules, and outreach and input mechanisms will be prepared and posted on the City’s website as well as the Meriden Biz brownfield hub/repository. We will post signage and prepare fact sheets in English and Spanish, including guidance on how to get information and provide feedback, which will be included in social media and website postings, public meeting notices, and direct mailings in the target area. At least 4 public meetings will be held on a hybrid basis, with in-person and virtual attendance options, to provide updates and seek input from the target area community. We will meet with each of our partner organizations on a quarterly basis to disseminate information and collect input from all of the members represented and served by those groups. Feedback from our project partners and received directly from the public will be consolidated, organized, posted, and incorporated into the reuse strategy for the site as the project progresses.

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

***3.a. Proposed Cleanup Plan:***

The City is decades into planning, design, and construction of the Harbor Brook Flood Control plan in the target area. The site is a keystone in the next phase of that plan, as it is situated on a bend in the river with steeply sloped banks creating a choke point and causing significant erosion and flooding. The site is a critical brownfield focus for the City, as the UST and polluted soil are an ongoing source of contamination affecting sensitive populations in the target area and generating contaminated sedimentation, erosion, and stormwater runoff into Harbor Brook. Brownfield funding is critical to implement the cleanup to address these ongoing environmental impacts, while ultimately facilitating the implementation of the reuse strategy to achieve relief from the on-site contamination and regional impacts in the target area. Closure of the underground storage tank, removal of residual building foundation components, and excavation and disposal of polluted soil and petroleum associated with the UST are essential steps toward the implementation of the reuse strategy.

The City has spent substantial funds to complete the abatement and demolition of the building previously located at the site. However, the residual subsurface foundation components remain, and must be removed to gain access to the contaminated soil and UST. The City has previously retained a design team which conducted an engineering analysis and determined that the remaining foundations require removal to facilitate the soil excavation, UST removal, and implementation of the reuse strategy, and that other remedial alternatives are not feasible. The slope and layout of the site requires shoring to accommodate earthwork activities. Once shoring is installed and foundations are removed, the UST and surrounding polluted soil will be accessible and excavated to achieve cleanup criteria. Excavated material will be managed by off-site disposal, with recycling of materials to the greatest extent feasible to reduce the carbon



footprint of the work. Upon achievement of the excavation goals, clean soil will be utilized to restore the site, and to the extent necessary construct a cap in the area proposed for the linear trail, pending confirmatory analytical results. The project will be overseen by a QEP under the Connecticut Voluntary Remediation Program. To facilitate the implementation and procurement of the project, we will follow a two-stage procurement strategy. First, we will competitively procure a QEP to provide technical expertise to support the cleanup. On behalf of the City, the QEP will prepare remediation permit documents and specifications that the City will then use to competitively procure a cleanup contractor. The QEP will provide construction oversight, documentation, confirmatory testing, waste characterization, communication activities, and closure reporting. Due to this strategy, our costs for QEP services are classified as “Contractual” and the remediation contractor costs are classified as “Construction” in our budget.

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

*3.b.i. Project Implementation/Discussion of EPA-funded Activities:*

<b>Task 1 – Cooperative Agreement Oversight</b>	
<b>Project Implementation:</b> A Selection Committee of our key staff will procure a QEP by competitive process. ACRES data management and quarterly and annual reporting will comply with the Cooperative Agreement and communicate grant status. One City staff member will attend the National Brownfields Conference twice to present and interact with our peers (includes travel).	
<b>Schedule:</b> Q 1 - Q16	<b>Task Lead:</b> City, assisted by QEP
<b>Outputs:</b> Final ABCA, RFP for QEP, Quarterly/Annual Reports, ACRES Work Packages	
<b>Task 2 – Community Outreach &amp; Engagement</b>	
<b>Project Implementation:</b> Work with our QEP to implement community engagement. From previous brownfield initiatives, we have a well-developed community action strategy. We will leverage this experience and formalize a Community Engagement Plan to detail and track the outputs and outcomes. We will prepare signage, 2 fact sheets, mail 4 public notices, host 4 public meetings, and meet with our community partner organizations quarterly (16 meetings).	
<b>Schedule:</b> Q1 - Q16	<b>Task Lead:</b> City, assisted by QEP
<b>Outputs:</b> Community Engagement Plan, sign, 2 fact sheets, 4 public notice mailings, 4 public meeting minutes, 16 stakeholder meeting minutes.	
<b>Task 3 – Cleanup Activities</b>	
<b>Project Implementation:</b> Procure remediation contractor, install excavation shoring and sheeting, dewatering, remove UST, remove concrete foundation and dispose debris (1,350 tons) to access underlying/surrounding UST and soil, and excavate and dispose contaminated soil (1,800 tons), regrade excavated area, construct soil cap as needed.	
<b>Schedule:</b> Q4 -Q14	<b>Task Lead:</b> City, assisted by contractor, and QEP
<b>Outputs:</b> RFP and contract for remediation contractors, field reports, compliance data	
<b>Task 4 – Cleanup Oversight and Documentation</b>	
<b>Project Implementation:</b> QEP and City staff will direct, observe, and document the cleanup to ensure compliance with state requirements. QEP will acquire approval of the remedial plan and permits per State requirements, contractor specifications and a QAPP, provide representation, collect compliance data, issue construction direction, acquire closure approval.	
<b>Schedule:</b> Q3-Q15	<b>Task Lead:</b> City, assisted by QEP
<b>Outputs:</b> Remedial plan/permit, contractor RFP, QAPP, construction notes and directives, cleanup documentation, completion report, regulatory approval, success story fact sheet.	

### 3.c. Cost Estimates

The cost estimates incorporated in the budget table below were developed with the assistance of our external design team which conducted an engineering analysis and prepared a formal Opinion of Construction Cost for the scope of work. Where uncertainty in the cost of construction was anticipated due to the timing of the work (i.e. start of construction services in Quarter 4 of the grant period), an appropriate inflation escalator was applied.

Budget Categories		Task 1 CA Over.	Task 2 Outreach	Task 3 Cleanup	Task 4 Oversight	Total
Direct Costs	Personnel	80hrs@\$45 =\$3,600	100hrs@\$45 =\$4,500	200hrs@\$45=\$9,000	100hrs@\$45 =\$4,500	\$21,600
	Fringe Benefits	80hrs@\$18 =\$1,440	100hrs@\$18 =\$1,800	200hrs@\$18=\$3,600	100hrs@\$18 =\$1,800	\$8,640
	Travel	Conference x 2= \$3,000	-	-	-	\$3,000
	Equipment	-	-	-	-	-
	Supplies	-	Printing = \$2,000	-	-	\$2,000
	Contractual	80 QEP hrs@\$150 =\$12,000	300 QEP hrs@\$150= \$45,000	200 QEP hrs@\$150= \$30,000	600 QEP hrs@\$150= \$90,000 Testing and analysis = \$25,000	\$202,000
	Construction	-	-	Site control and mob. = \$25,000 UST shoring/closure = \$100,000 Earthwork & controls = \$200,000 1,800 tons soil @\$100 = \$180,000 1,350 tons concrete @ \$80 = \$108,000 Restoration/cap = \$125,000	-	\$738,000
	Other	-	-	-	-	-
Total Dir. Costs		\$20,040	\$53,300	\$780,600	\$121,300	\$975,240
Indirect Costs		-	-	-	-	-
Total Budget		\$20,040	\$53,300	\$780,600	\$121,300	\$975,240

### 3.d. Measuring Environmental Results

Project progress, outputs, and outcomes will be measured and tracked by the City with assistance from our QEP. Our Project Director and Finance Director will oversee the QEP and contractor, compile information to track financial progress, provide administrative checks and balances, and communicate progress to EPA. To measure the progress towards the ultimate outcome, which is

the successful cleanup of the site which will directly facilitate the success of the reuse strategy, the City with assistance from our QEP will produce records, documents, and communications that will track the outputs including public and community partner meetings, public notices, fact sheets, permits and regulatory approvals, construction reports, compliance evaluations, quarterly and annual reports to EPA regarding progress, expenditures, MBE/WBE inclusion, ACRES work packages, project profiles, closeout reports, and technical progress of the contractor.

#### **4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE**

*4.a.i Organizational Structure and 4.a.ii Description of Key Staff:* We rely on grant funds to carry out many of the City's functions and are therefore extremely experienced managing grants of this nature. We have a structure tailored to operate in the federal grant realm, have successfully managed USEPA Brownfield grants for over 20 years, and have committed appropriate resources to ensure success. We are a City Manager form of government, with professional department heads reporting directly to the City Manager. City staff have capacity and experience related to the successful expenditure of funds and completion of all technical, administrative, and financial requirements of the project and grant.

Joseph Feest, Economic Development Director, will serve as the Project Director. Mr. Feest has ultimate authority and responsibility for program implementation and is uniquely suited to facilitate success in achieving the desired program outcome. Prior to Mr. Feest's current position of the past 5 years, he was a City Councilor for 8 years, on the Zoning Board of Appeals for 15 years, and president of a successful insurance company for 20 years.

Brian Ennis, PE, City Engineer, will serve as the technical project lead. Mr. Ennis has worked in the Public Works Department for over 15 years. During that time, he led the implementation of over \$35 million in complex multidisciplinary flood control projects and remediation of brownfields sites, oversaw all municipal engineering services, and has acquired detailed familiarity with environmental regulatory programs associated with brownfields projects.

Mr. Feest and Mr. Ennis will be supported by a deep bench of technical and administrative competency, including Jeanette Munoz Allam, the Community Development & Grants Administrator, and Frank Ocskasy, the City Director of Accounting. Mrs. Allam and Mr. Ocskasy have provided administrative, implementation, compliance, reporting, and finance control for several EPA brownfields grants and many other federal grant programs.

*4.a.iii. Acquiring Additional Resources:* The City will utilize two outside resources to achieve success: 1) A QEP will complete bid specifications, permitting, testing, outreach support, and oversight. We will diligently pursue a high-quality QEP, with substantial expertise in ACRES, EPA grant management, remediation, and community engagement. A steering committee, consisting of key staff listed above, will lead the procurement. 2) A cleanup contractor will implement the construction-based services. Once on board, our QEP will join our steering committee and provide technical insight to procure the cleanup contractor. Our internal legal team will assist with contract negotiations, so retention of an external attorney is not needed.

All contracts for engineering and cleanup will be competitively awarded in compliance with the Procurement Standards in 40 CFR Part 30 or 40 CFR Part 31.36, as appropriate. The City has a process in place that encourages proposals from small, disadvantaged, and local businesses, and helps businesses connect and team with other firms which may have synergistic capabilities. We

will utilize the experience and resources of our community partners, including Meriden Biz, to engage quality firms and programs. Any contracts awarded under this cleanup grant will be evaluated using a variety of criteria, including expertise, availability, past work, and cost. We will utilize the resources of our Finance Director and Grants Administrator to ensure all federal procurement and administrative requirements are met during the duration of the cleanup project.

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

*4.b.i. Currently Has or Previously Received and EPA Brownfields Grant:*

*4.b.i (1) Accomplishments:* Over the past 20 years, Meriden has implemented ten EPA brownfields grants: four assessment (2004, 2007, 2009, and 2015), and six cleanup (2006, 2007 [2], 2012, 2013, 2018). The table below summarizes the two most recent grants (last 10 years).

Grant	Awarded	Accomplishments
2018 Cleanup	\$200,000	<p><b>Outcomes:</b> Removal of two USTs; remediated soil and petroleum and PCB oil from the boiler room at the Meriden Hospital.</p> <p><b>Outputs:</b> Public notice, QAPP; bid specs; PCB remediation report; UST removal report; regulatory closure approval certificate; complete, accurate, and timely ACRES and EPA reporting.</p>
2015 Assessment	\$200,000	<p><b>Outcomes:</b> Hazmat building assessments, Phase I ESAs, and Phase III at Mills Housing Complex (5 buildings); Hazmat building assessment, cost estimates, Phase II ESA, and remediation analysis at Meriden Hospital; Areawide brownfield plan implementation.</p> <p><b>Outputs:</b> 6 Hazmat assessment reports; 4 Phase I ESA reports; 2 Phase II ESA reports; 1 Phase III ESA report; 2 remediation cost estimates; 1 remedial action plan; TOD Market Assessment and Reuse Plan; complete, accurate, timely ACRES and EPA reporting.</p>

*4.b.i (2) Compliance with Grant Requirements:* The City successfully implemented the two recent grant programs listed above in compliance with grant requirements. Key program tasks related to each grant were completed in accordance with the associated work plans, and Cooperative Agreement including submission of quarterly progress reports to USEPA, drawdown requests, MBE reports, ACRES updates and annual financial reports were completed.

The City aggressively implemented the 2015 Assessment Grant, completing numerous tasks with positive output and outcomes and successfully closed the grant in a timely fashion. However, challenges were encountered during the 2018 Cleanup Grant at the Meriden Hospital property due to circumstances beyond the control of the City. Our 2018 consisted of \$150,000 for petroleum and \$50,000 for hazardous materials. The City aggressively implemented petroleum grant funded work, and successfully finished those tasks quickly. The hazardous materials funding was earmarked for asbestos abatement on the roof of the building. However, complications were encountered by the selected developer who was unable to assemble a critical \$30M financial commitment package, which delayed the schedule for building transfer and demolition. Since the City’s commitment to utilize the hazardous cleanup grant funds was reliant on the building demolition process, these delays affected the City’s ability to implement the abatement in a timely manner. In 2021 the City acquired an extension from EPA to extend the work into 2022. However, despite intense negotiations and creative option analyses, the developer still was not able to move forward and the hazardous grant funds could not be expended prior to grant expiration.

**Threshold Criteria for Cleanup Grants**  
**EPA-OLEM-OBLR-23-15**  
**CFDA 66.818**  
**51-53 South Colony Street, Meriden, Connecticut 06450**

**1. Applicant Eligibility**

The applicant, the City of Meriden, Connecticut, is an eligible entity for the Environmental Protection Agency's Brownfields Cleanup Grant as a "General Purpose Unit of Local Government".

**2. Previously Awarded Cleanup Grants**

The City of Meriden affirms that that the proposed site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

**3. Expenditure of Multipurpose grant**

The City of Meriden affirms that it does not have an open EPA Brownfields Multipurpose Grant.

**4. Site Ownership**

The City of Meriden is the sole owner of the 51-53 South Colony Street site. Ownership is in fee simple title. The Site was acquired by the City on July 30, 2012 by eminent domain. A Certificate of Taking is on file in the City Land Records. The City will own the site for the duration of time in which Brownfields Cleanup Grant funds are disbursed for the cleanup of the site.

**5. Basic Site Information**

(a) **Site name:** 51-53 South Colony Street

(b) **Site address:** 51 South Colony Street, Meriden, Connecticut 06450 (Map/Lot: 0109-0044-005A-0000)

**6. Status and History of Contamination at the Site**

(a) **Contamination Type:** Co-mingled Petroleum and Hazardous Substances

(b) **Operational History and Current use:** The site includes a 0.33-acre parcel of land situated between South Colony Street and the adjacent Harbor Brook. The site was previously occupied with a two-story building historically utilized for commercial and industrial uses, including electricity generation, welding, storage, and other commercial activities. Initial development appears to have taken place in the mid to late 1800's. The City acquired the site by eminent domain in July 2012 to proactively stem the further deterioration of the building, protect the public from immediate public health and safety hazards, to implement the needed environmental cleanup, and facilitate the implementation of the Harbor Brook Flood Control project which affects the site. The City demolished the building to the street level in 2014 and the site is currently vacant. The basement and foundation of the former building remain.

(c) **Environmental Concerns:** Environmental investigations have been completed at the site by the City including a Phase I Environmental Site Assessment (ESA) on May 18, 2011

and a Phase II ESA in January 2019. Prior environmental assessments reveal five Areas of Concern including historic industrial use, sitewide urban fill, an underground storage tank, former coal storage, and a loading dock. Investigations of each of these areas of concern have confirmed the presence of soil and urban fill containing volatile organic compounds (VOCs), extractable total petroleum hydrocarbons (ETPH), petroleum, metals, and polycyclic aromatic hydrocarbons (PAHs). Each of these Areas of Concern will be addressed under this EPA cleanup grant. In order to implement the soil and tank remediation activities, the remaining portions of the former building basement, foundation, and adjacent sidewalk must be removed.

- (d) ***How the site became contaminated, and to the extent possible, describe the nature and extent of the contamination.*** The Site has a long history of industrial uses prior to the City's acquisition, which contributed to the degradation of environmental media at the site. These industrial uses resulted in the placement urban fill and other fill materials in former low lying and wetland areas along the adjacent Harbor Brook. The filling and industrial uses also resulted in the cross contamination of existing site soils. While the specific origin of the fill material is unknown, it has been documented to contain materials such as coal fragments, coal ash, and petroleum, and is located across a large portion of the Site. Additionally, an underground storage tank previously used to store heating oil for the Site building is located in the northeast corner of the Site, and petroleum related compounds have been detected in surrounding soil. While most of the building has been demolished, the foundation and basement require removal to gain access to the tank to facilitate removal and excavation of soil containing urban fill and petroleum.

## **7. Brownfield Site Definition**

The City affirms that the site meets the definition of a brownfield, and that the site: (a) is not listed or proposed for listing on the National Priorities List, (b) is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrease issued to or entered into by parties under CERCLA, and (c) is not subject to the jurisdiction, custody, or control of the U.S. government.

## **8. Environmental Assessment Required for Cleanup Grant Applications**

A Phase I ESA report was completed for the 0.33 acre site by Fuss & O'Neill on May 18, 2011 prior to acquisition of the property. A ground-penetrating radar survey was performed at the Site in 2018. The survey identified the presence of the underground storage tank adjacent to the former building. A Phase II Environmental Site Assessment was subsequently completed for the Site by Milone & MacBroom, which was documented in a written Phase II assessment report, dated January 16, 2019. The assessment was completed by a State of Connecticut Licensed Environmental Professional (LEP), on behalf of the City of Meriden. The objective of the investigation was to determine if a release had occurred by evaluating soil and groundwater characteristics within the Recognized Environmental Concerns (RECs) identified in the Phase I Environmental Site Assessment conducted in 2011.

The Phase II investigation involved the collection and analysis of 15 soil samples, one sediment sample, and the installation of groundwater monitoring wells. Soil and groundwater results were compared to the Connecticut Remediation Standard Regulations to determine whether releases occurred and/or remediation will be necessary. The Phase II report recommended the tank be removed with sampling following State guidelines for tank removals, and that soil and fill material requires management as polluted soil.

## 9. Site Characterization

- a. Not applicable
- b. The City of Meriden is not a State or Tribal Authority and has therefore attached a letter from the Connecticut Department of Energy & Environmental Protection, which is the jurisdictional State Environmental Authority. This letter is dated October 20, 2023, and provides the following information:
  - i. affirms the site is eligible to be enrolled in the state voluntary response program,
  - ii. indicates that while the site is not currently enrolled in the voluntary program, the City of Meriden intends to enroll the site in the voluntary program, and
  - iii. indicates that there is a sufficient level of characterization completed for the remediation work to begin.
- c. Not applicable

## 10. Enforcement or Other Actions

The City of Meriden affirms there are no known ongoing or anticipated environmental enforcement or other actions related to the site for which Brownfields Grant funding is sought.

## 11. Sites Requiring a Property-Specific Determination

The City of Meriden affirms that the Site does not fall into any of the categories that require a Property-Specific Determination to be eligible for funding.

## 12. Threshold Criteria Related to CERCLA/Petroleum Liability

The site is contaminated with hazardous substances and petroleum. The City of Meriden is providing responses to items a. and b. in this section.

### a. *Property Ownership Eligibility – Hazardous Substance Sites*

#### i. *Exemptions to CERCLA Liability*

- (1) Not Applicable
- (2) Not Applicable
- (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 City of Meriden acquired 51-53 South Colony Street by eminent domain to proactively stem the further deterioration of the building, protect the public from immediate public health and safety hazards, and to demolish the structure in order to implement the Harbor Brook Flood Control plan. A Certificate of Taking is on file in the City Land Records.

(b) *Provide the date on which the property was acquired:* The City of Meriden acquired 51-53 South Colony Street on July 30, 2012.

(c) *Identify whether all disposal of hazardous substances at the site occurred before you acquired the property:* The disposal of hazardous substances at the site occurred prior to City ownership as documented in a 2011 Phase I Environmental Site Assessment.

(d) *Affirm that you have not caused or contributed to any release of hazardous substances at the site:* The City affirms that it has not caused or contributed to any release of hazardous substances at the site. The City has taken steps to prevent any future releases by removing the above ground structures and fencing the property to avoid trespass and non-authorized access to 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 City 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 Requirement for Asserting an Affirmative Defense to CERCLA Liability:* Not Applicable

iii. *Landowner Protection from CERCLA Liability:* Not Applicable

**b. *Property Ownership Eligibility – Petroleum Sites***

A Determination of Eligibility for Brownfields Petroleum Remediation Funding letter, dated October 20, 2023 from the Connecticut Department of Energy and Environmental Protection is attached.

*i. Information required for a petroleum site eligibility determination*

*(1) Current and Immediate Past Owners:*

- i. Current owner of the site and the UST: City of Meriden (applicant)
- ii. Immediate past owner of the site and the UST: Alfred Liseo (an individual)

*(2) Acquisition of Site:* The City acquired the property on July 30, 2012, by eminent domain. A Certificate of Taking is on file in the City Land Records.

*(3) No Responsible Party for the Cleanup of the Site:*

The City of Meriden:

- (i) has not dispensed or disposed of petroleum or petroleum product contamination, or exacerbated the existing petroleum contamination at the site
- (ii) has not owned the site or the UST when any dispensing or disposal of petroleum (by others) took place



- (iii) has undertaken reasonable steps with regard to the contamination at the site.

Immediate Past owner:

- (i) it is not known whether the past owner dispensed or disposed of petroleum or petroleum product contamination, or exacerbated the existing petroleum contamination at the site
- (ii) it is not known whether the past owner owned the site or UST when any dispensing or disposal of petroleum (by others) took place
- (iii) it is not known whether the past owner has undertaken reasonable steps with regard to the contamination at the site

(4) *Cleaned Up by a Person Not Potentially Liable:* The City of Meriden has not dispensed or disposed of petroleum or petroleum product or exacerbated the existing petroleum contamination at the site. The City has taken reasonable steps with regard to the contamination at the site by assessing the property prior to acquisition, further assessing the site conditions after acquisition, and fencing and securing the property.

(5) *Judgments, Orders, or Third-Party Suits:* The City of Meriden affirms that no responsible party (including the applicant) is identified for the site, through either: (a) a judgment rendered in a court of law or an administrative order that would require any person to assess, investigate, or clean up the site; or (b) an enforcement action by federal or state authorities against any party that would require any person to assess, investigate, or clean up the site; or (c) a citizen suit, contribution action, or other third-party claim brought against the current or immediate past owner, that would, if successful, require the assessment, investigation, or cleanup of the site.

(6) *Subject to RCRA:* The Site is not subject to RCRA or any order under § 9003(h) of the Solid Waste Disposal Act.

(7) *Financial Viability of Responsible Parties:* The City of Meriden, as the current owner of the site and the UST, is not responsible for the contamination at the site. The immediate past owner is not financially viable for the purposes of addressing any petroleum contamination present at the site. As indicated in the attached Determination of Eligibility for Brownfields Petroleum Remediation Funding letter, dated October 20, 2023 from the Connecticut Department of Energy and Environmental Protection, the State has determined that the immediate past owner is not financially viable.

### 13. Cleanup Authority and Oversight Structure

- a. **Cleanup oversight:** The City of Meriden plans to enroll the site in the Connecticut Department of Energy and Environmental Protection's Voluntary Remediation Program (VRP) to facilitate cleanup of the property. Remediation will be overseen by a Licensed Environmental Professional in the State of Connecticut. The LEP(s) will keep USEPA and Connecticut Department of Energy and Environmental Protection apprised of remediation progress throughout the project. The Licensed Environmental Professional and the cleanup contractor will be selected by the City of Meriden through a competitive

procurement process consistent with provisions of 2CFR 200.317 through 200.327, as appropriate.

- b. **Impact to neighboring properties:** The City does not expect to need permission of adjoining properties to access the site, but all adjoining property owners will be duly notified of any cleanup actions. The City of Meriden is the owner of 31-33 South Colony Street which abuts the site.

#### 14. Community Notification

- a. **Draft Analysis of Brownfield Cleanup Alternatives:** A Draft ABCA was prepared for this project. The City of Meriden allowed the community an opportunity to review and comment on the draft application and ABCA as part of a Community Notification and Public Comment period (described below). If the application is selected for funding, the City will finalize the ABCA for this project and provide the public opportunity for additional public review and comment as part of pre-cleanup activities. The Draft ABCA is included as an attachment.
- b. **Community Notification Ad:** The City of Meriden published a community notification ad in the Record-Journal Newspaper on October 25, 2023. The notification was also published on the City's website at [www.meridenct.gov](http://www.meridenct.gov) beginning October 30, 2023. The community notification ad indicated 1) that a copy of this grant application, including the draft ABCA, is available for public review and comment; 2) how to comment on the draft application; 3) where the draft application is located; and 4) the date, time, and location of the public meeting.
- c. **Public Meeting:** An online public meeting was held on Monday, November 6, 2023 at 5:30 PM to review and discuss this application and solicit public comments on the application and the draft ABCA. The meeting presentation was also recorded and posted on the City's website to allow additional members of the public to view it at a later date.
- d. **Community Notification Documents:** The following items are included as an attachment to the Threshold Criteria Response:
  - the Draft ABCA,
  - a copy of the newspaper ad published on October 25, 2023 and the website posting dated October 30, 2023, which demonstrates solicitation for comments on the application and that notification to the public occurred 14 calendar days before the application was submitted to EPA,
  - a summary of the comments received,
  - the applicants response to comments,
  - meeting notes from the public meeting, and
  - the meeting participant list

#### 15. Contractors and Named Subrecipients

The City of Meriden has not procured any contractors to implement the work outlined in this application. The City also has named no subrecipients for the Brownfield Grant funding.



October 20, 2023

Mr. Joseph Feest  
Director of Economic Development  
City of Meriden  
142 East Main Street  
Meriden, CT 06450

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

Dear Mr. Feest:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the City of Meriden intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2024. The City of Meriden plans to use the grant funding to remediate the properties at 51-53 South Colony Street in Meriden, CT (the Site) that are contaminated with 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 City of Meriden 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:

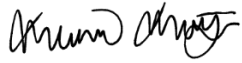
- Phase I Environmental Site Assessment (ESA) by Fuss & O'Neill, Inc. dated May 2011
- Phase II ESA by Milone & Macbroom, Inc. dated January 2019

DEEP concludes there is a sufficient level of site characterization from the ESAs 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 DEEP's web site at <https://portal.ct.gov/DEEP/Remediation--Site-Clean-Up/Brownfields/PREPARED-Municipal-Workbook-Main-Page>.

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

Sincerely,

A handwritten signature in black ink, appearing to read 'Meena Mortazavi', written in a cursive style.

Meena Mortazavi  
Interim Brownfields Coordinator

c: Ms. Dorrie Paar, EPA (via e- mail)



October 20, 2023

Mr. Joseph Feest  
Director of Economic Development  
City of Meriden  
142 East Main Street  
Meriden, CT 06450

RE: Determination of Eligibility for Brownfields Petroleum Remediation Funding  
51- 53 South Colony St. Meriden, CT (the "Site")

Dear Mr. Feest:

The Connecticut Department of Energy and Environmental Protection (DEEP) has reviewed a request (the Request) from the City of Meriden for a Brownfield Petroleum Eligibility Determination for the Site. Mr. Patrick Dowling of Fuss & O'Neill, Inc. provided the Request to DEEP in an e-mail to me on October 16, 2023. The City of Meriden is seeking this determination in support of their application for an EPA Brownfield Cleanup Grant for Federal Fiscal Year 2024. The City of Meriden proposes to use any funding that may be awarded to demolish building foundations and substructures, to remove an underground storage tank from the Site, collect soil samples from the tank grave, and document removal of the tank. Based on the information provided to DEEP and from other sources, DEEP has determined the following:

1. There is no viable responsible party; and
2. The Site will not be assessed, investigated, or cleaned up by a person that is potentially liable for cleaning up the site.
3. The Site is not subject to a corrective action order under the Resource Conservation and Recovery Act (RCRA) § 9003(h).

The City of Meriden (the Current Owner) acquired the Site from Mr. Alfred Liseo (the Immediate Past Owner) on July 30, 2012, by exercising its power of eminent domain. The Request indicates that the Immediate Past Owner is a private individual who owned the Site in his own name.

The Current Owner demolished buildings on the Site in 2014, and currently uses the Site for flood control purposes. The Current Owner (i) has not dispensed or disposed of petroleum or petroleum product contamination or exacerbated the existing petroleum contamination at the Site; (ii) has not owned the Site when any dispensing or disposal of petroleum (by others) took

place; and (iii) has undertaken reasonable steps regarding the contamination at the Site. The Immediate Past Owner acquired the Site in 2009 and used the Site for storage purposes. DEEP has not determined whether the Immediate Past Owner (i) has dispensed or disposed of petroleum or petroleum product contamination or exacerbated the existing petroleum contamination at the Site; and (ii) has owned the Site when any dispensing or disposal of petroleum (by others) took place; and (iii) has undertaken reasonable steps regarding the contamination at the Site.

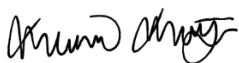
DEEP does not consider the Current Owner to be liable for any petroleum contamination that may be present on the Site because they obtained the Site by exercising the power of eminent domain. DEEP has not determined whether the Immediate Past Owner is potentially liable for any petroleum contamination that may remain on the Site. DEEP does not consider the Immediate Past Owner to be financially viable for the purposes of addressing any petroleum contamination that may be present on the Site as DEEP generally does not consider private individuals to be financially viable.

Based on the above determinations that were made in accordance with current [DEEP Petroleum Eligibility Determination Guidance](#) (dated June 12, 2023), the Site is eligible for petroleum funding from EPA.

Determinations made in this letter pertain solely to the Brownfields Petroleum Eligibility Determination and are not meant to determine liability for pollution on or emanating from the Site.

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

Sincerely,



Meena Mortazavi  
Interim Brownfields Coordinator

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