R01-22-C-010

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

1. Applicant Identification
   Peter W. Davis, Executive Director
   Renaissance City Development Association, Inc.
   216 Howard Street
   New London, CT 06320
   DUNS # 112472654

2. Funding Requested
   a. Grant Type Single Site Cleanup
   b. Federal Funds Requested
      i. $615,000
      ii. Not requesting a waiver of the 20% cost share requirement.
      iii. Requesting a waiver of the $500,000 limit. ($615,000)

3. Location- City of New London, Connecticut

4. Property Information
   43 Hempstead Street, New London, CT 06320

5. Contacts
   a. Project Director
      Peter W. Davis, Executive Director
      Renaissance City Development Association, Inc.
      216 Howard Street
      New London, CT 06320
      (860)917-5283 pdavis@rcda.co

      Project Manager
      Tom Bombria – Community Development Coordinator
      Office of Development and Planning
      (860)437-6346 tbombria@newlondonct.org

      Chief Executive/Highest Ranking Elected Official
      Linda Mariana, President
      Renaissance City Development Association, Inc.
      216 Howard Street
      New London, CT 06320
      (860)961-7746 lmariana@rcda.co

6. Population
   27,367 (U.S. Census 2020)

7. Other Factors Checklist
   Applicants claiming one or more of the other factors below must provide a summary in the Narrative on the applicable other factor(s). Please identify which of the below items apply to your community/proposed project by noting the corresponding Narrative page number. If the factor do not apply, state N/A.

| **Other Factors** | Page # |
|---|---|
| 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 project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation. | 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). | N/A |
| The proposed site(s) is in a federally designated flood plain. | N/A |
| The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy. | N/A |
| The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures. | N/A |
| The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing. | NA |

8. Letter from the State or Tribal Environmental Authority:
   State: Attached State of Connecticut letter.

9. Releasing Copies of Applications

   **Not applicable.**

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

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November 29, 2021

Mr. Peter Davis, Executive Director
Renaissance City Development Association, Inc.
216 Howard St.
New London, CT 06320

Re: State Acknowledgement Letter for EPA Brownfields Cleanup Grant for FY 22

Dear Mr. Davis:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Renaissance City Development Association, Inc. (RCDA) intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2022. RCDA plans to use the grant funding for cleanup of hazardous substances at its property at 43 Hempstead Street in New London.

Cleanup work funded by an EPA grant must be performed in one of Connecticut's formal remediation programs, including among others the Voluntary Remediation Program pursuant to CGS § 22a-133x. DEEP acknowledges that RCDA has entered the 43 Hempstead Street site into the State's voluntary remediation program pursuant to CGS Section 32-768. RCDA will be required to enroll the site in the Voluntary Remediation Program as a requirement of the Abandoned Brownfields Cleanup Program.

RCDA may want to refer to DEEP's PREPARED Municipal Workbook. This 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) 424-3768 or by e-mail at mark.lewis@ct.gov. Good luck with your application.

Sincerely,

Mark R. Lewis

Mark R. Lewis
Brownfields Coordinator
Office of Constituent Affairs & Land Management

c: Ms. Dorrie Paar, EPA (via e- mail)
Mr. Tom Bombria, City of New London, (via e- mail)

## 1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

### 1.a. Target Area and Brownfields

#### 1.a.i. Background and Description of Target Area

Located at the mouth of Thames River in Connecticut, the City of New London (the "City") is known for its deep harbors and was the epicenter of the whaling industry throughout the 1800s. As whaling declined, the Naval Submarine Base New London and the U.S. Coast Guard Academy took over, bringing the primary operations of General Dynamics' Electric Boat, a major submarine designer, producer, and maintainer. The City is also home to large pharmaceutical companies, including Sheffield Pharmaceuticals and Pfizer. The City is listed as the third most distressed municipality in the State, and the median household income is almost 50% less than the state median.

Our target area, the Hempstead Historic District, is within close proximity to the City's downtown. In this historic district, one of New London's first abolitionists built small homes to sell to newly freed black families, combatting the discrimination they faced during that time in purchasing homes. **Environmental justice is deeply rooted in our target area; a disadvantaged, low-income, and minority community facing additional environmental burdens.** There are seven known brownfields within one mile of the target site and over 120 contaminated or potentially contaminated properties present in the area. The history of illegal dumping and magnitude of contaminated sites has caused the homeownership rates and property values to decline. These combined issues have resulted in increased incidences of illegal dumping and increased crime rates and drug use, resulting in an unsafe neighborhood. Residents lack safe spaces and outdoor areas to utilize in the community. **The target site is centrally located in the neighborhood and is the only space with the potential for a neighborhood park.** The EPA Cleanup funds requested will act as a catalyst to the neighborhood's revitalization and create a chain reaction of cleaning up the other brownfield sites in the City.

#### 1.a.ii. Description of the Brownfield Site

Our target site, 43 Hempstead Street (the "Site"), is a 0.6-acre vacant property with a long industrial history. The Site is located approximately 1,000-feet from the Thames River and is at the corner of Hempstead Street and Home Street. The City has zoned the area as R-3, multi-family medium density residential zone, which includes land-use of public parks and green spaces. Our Site was first developed prior to 1884 by the Pequot Preserving Company, a canning company. Multiple silk manufactures, dry cleaners, and electronic manufacturers would later occupy the Site. The Site was sold to Shiloh Development Corporation in 1998, a local church, Shiloh New London Church (the "Church"). The Church planned on creating a parking lot together with a basketball court but never acquired the funds to redevelop the Site. In 2020, the City of New London City Council purchased the Site for $75,000 after a donation from Lawrence and Memorial Hospital.

Today, the Site has no occupying structures. The final buildings were demolished between 1996 and 2005, but remnants of building foundations remain on the property. The only complete structure remaining is a retaining wall on the northeast property boundary. Several environmental assessments of the Site have been completed since the early 2000s, the most recent in August of 2021. During the latest Phase I site investigation, an **8,000-gallon underground storage tank installed in 1957 and a 5,000-gallon tank from 1939 were determined to be still present on the property**. Historical uses of coal as building fuel indicate **metals and polyaromatic hydrocarbons (PAHs) associated with coal ash**. There is also a documented release of 100 gallons of chemicals and petroleum in one of the buildings in 1997 with no remedial action. In

September of 2021, soil contamination present was confirmed through soil borings. It included the presence of **Semi-Volatile Organic Compounds (SVOCs), including benzene compounds, Pesticides and Polychlorinated Biphenyls (PCBs), heavy metals**, **which exceeded the Connecticut remedial standard regulations for residential use**, including soil and groundwater pollutant mobility criteria. The contamination present at the Site poses a health risk to families and children in the neighborhood that frequent the Site, often disregarding the fence installed by the municipality.

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

**1.b.i. Reuse Strategy and Alignment with Revitalization Plans**

There has been a significant effort to modernize the City's downtown area while maintaining the historic buildings, including the rehabilitation and effective reuse of older structures. New development in New London will capitalize on the **City's unique culturally enriched downtown and its multi-modal transportation hub** (ferry system, bus, Amtrak, heritage park water taxi, etc.). A housing complex with more than 100 energy-efficient units was recently developed downtown, while the City has plans for a new recreation center. In addition to these efforts, the City's economic development strategy prioritizes the preservation and access to open space.

The redevelopment plan for the Site will complement the City's development efforts and incorporate the community's input. The local neighborhood organization, the Freedom Trail Neighborhood Association (FTNA), is highly active on revitalization projects, including restoring old buildings and creating additional housing units. The neighborhood's vision is to provide a community space for children and the elderly, which is currently lacking in the area. **The neighborhood refers to itself as the forgotten neighborhood of New London due to the significant disinvestment in the area**. Once the contamination is removed from this Site, FTNA's vision is to create a sensory and handicap-friendly, natural playground. The community members desire a track around this Site for the neighborhood to utilize for physical activity. The park will be fenced in to help with safety concerns of nearby traffic and will feature a "graffiti/mural wall" to showcase the community's artistic skills. A community garden is envisioned for the Site by collaborating with FRESH, a New London food justice organization whose goal is to empower the youth, connect the community, and grow food to dismantle systemic oppression and build food sovereignty. As the Site is located **near a federally designated flood plain, the new development will feature stormwater landscape installments to mitigate flooding in the area**, promote natural irrigation options, and add to the aesthetic appeal. Recognition of local stakeholders involved in the project will be memorialized in plaques showcased in the park's pathways.

**FTNA is currently soliciting additional input from the community through a survey concerning additional redevelopment suggestions for the Site**. With this survey, the FTNA plans to engage local youth by offering a paying position to teens and young adults to survey their community and collect and evaluate the community's input.

**1.b.ii. Outcomes and Benefits of Reuse Strategy**

The City's general revitalization strategy encourages the beautification of properties and neighborhood stabilization by rehabilitating existing properties. The Site's redevelopment will serve as a new attraction to the area and increase local business revenue while providing a gathering place for the community. Anticipated benefits include **homeownership and local property value increases, physical and mental health improvement, and community pride,**

**in addition to a better environmental quality**. As the only park in the neighborhood, the Site will serve as a safe place for outdoor activities and a gathering place for families, children, and the elderly. Given the 20 years of community efforts, the Site's revitalization will be a significant achievement of the local neighborhood and boost morale among the residents. **The neighborhood is a state-designated environmental justice community whose members will directly benefit from the Site's revitalization**.

**Renewable energy applications will be featured in the proposed redevelopment**. Solar street lamps will be used throughout the park to eliminate utility costs, and best management practices will be implemented to reduce the amount of runoff generated from impervious surfaces during storm events. In addition, revitalizing the Site will create opportunities to work with organizations like FRESH to **generate employment opportunities for local businesses and spur economic development in the area**.

### 1.c. Strategy for Leveraging Resources

#### 1.c.i. Resources Needed for Site Reuse

The Site's redevelopment will be supported through additional grants the RCDA, the City, and FTNA will pursue. Additional remediation costs that might exceed the EPA requested funds will be covered by other grants the Site is eligible for, including the **Connecticut Department of Economic and Community Development (DECD**) Remedial Action and Redevelopment Municipal Grant Program that the City has applied for. In addition, the City currently has **$1M in American Recovery Act funds** committed to brownfields remediation and will cover any unexpected costs including site preparation for redevelopment. Additional grant opportunities will be pursued from local foundations. **Robert Wood Johnson Foundation's Culture of Health Initiative** provides funds to develop park equity, particularly for small urban communities impacted by park and green space inequities. One of the grant types the Foundation currently offers is the, "People, Parks, and Power: A National Initiative for Green Space, Health Equity, and Racial Justice," and could provide up to $500,000 to create the park after the cleanup is complete. An additional $30,000 in grant funding is available through the **Community Foundation of Eastern Connecticut** that targets youth empowerment through environmental education and focuses on environmental justice projects in Southeastern Connecticut towns. This grant would be used to create spaces for youth to engage in active play and explore the environment while improving their physical fitness by creating a natural playground. Securing the funding for the Site's cleanup through the EPA Cleanup funding would increase the success of securing additional funding in the future.

#### 1.c.ii. Use of Existing Infrastructure

The Site is currently served by electricity, municipal water, and sewer. Multi-modal transportation is available within a mile of the Site, including a train station, a greyhound bus line, ten local bus stops, and a ferry. In addition, U.S. Highway 1 and I-95 are within two miles of the Site. The Site reuse will be an open green space requiring limited infrastructure improvements. Stormwater management will be performed on Site by adopting best management practices, incorporated in the redevelopment plan. Fencing of the property will allow children to play without safety concerns to the nearby roadway. Additionally, speed bumps will be installed as an effective measure to manage speeding vehicles.

## 2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

## 2.a. Community Need

### 2.a.i. The Community's Need for Funding

The City of New London does not have the ability to support the remediation and reuse of the Site given the **significant financial difficulties the community is facing**; the median household income of $46,398 is far below the State average ($78,444),[1] and the per capita income also follows the same trend ($25,857 for the City compared to $44,496 for Connecticut)[1]. The **poverty levels within the City are more than double compare to the rest of the State**, with an overall rate of 24.51% compared to State average of 9.92%. Young people under 18 to experience even higher poverty levels that climb at 40.03% in contrast to 13.31% of the state average.[1] In addition to the community's struggles, the impact of COVID-19 pandemic resulted to almost **three times higher unemployment rate** of 13.30% in 2020 from 5% in 2019[1]. The municipality is at the top one third of the towns in Connecticut with the **highest for debt per capita, which has almost doubled** since 2010.[1] The **City's grand list has dropped more than 25% in 2014 but has never been able to recover**,[1] facing significant budget cuts for education and other social services. The Site has been sitting for over 20 years with no progress due to the lack of resources and funding. The census block group (090116905002) where the Site is located has one of the ***highest percentages of low income populations (64%) raking at 94%ile within the State***.[2] In a neighborhood where disadvantaged, low income populations are facing environmental injustice for over 20 years, there is imperative need to receive public funds for the remediation of this property.

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

*(1) Health or Welfare of Sensitive Populations*

Our community has highly sensitive populations including **low income and minorities**, which rank amongst the highest at the State, **82%ile and 94%ile**, respectively (data for census block group 090116905002).[2] **Linguistically isolated populations and people with less than high school diploma are also present in the neighborhood amongst the highest rates at 92%ile** within the State. Our community is disadvantaged, and our people are facing additional health and welfare challenges. The City has a high percentage of impoverished populations who receive **SNAP benefits at almost over double the state average**, at 27.6% compared to 11.9% at the State level.[1] With **a rate more than double the State average**, our residents are enrolled in Medicaid (Title 19) public health insurance program and the Department of Social Services' Temporary Family Assistance.[1] Our young community is also facing significant challenges; **juvenile arrests follow at almost double the State rate** with the City to experience 1,934 arrests per 100,000, compared to the state value of 1,009.[1] With the cleanup of our Site, youth will have a safe place to gather and feel connected to their community, encouraging their community pride and reducing disengaged youth rates. **Clean-up of the Site will directly benefit the disadvantaged community by encouraging neighborhood gatherings,** connect people with different backgrounds, and increase the percentage of people living near a green space which is one of the lowest amongst the state (29% of people living in New London County lived within half a mile of a park compared to 41% for Connecticut)[3].

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

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[1] CT Data Collaborative http://data.ctdata.org/

[2] EPA's EJSCREEN tool

[3] CDC https://ephtracking.cdc.gov/showInfoByLocationExt/?&FIPS=09011

Higher than normal incidence of diseases and adverse health conditions plague our community. New London, and particularly our census tract, has one of the **highest asthma emergency department and hospitalization rates** of 287.9 cases per 10,000 people, amongst the highest within the State.[4] **Children with asthma** also have one of the highest rates in the New London School District; 21% compared to a state average of 13.9.[5] Air quality related indicators and adverse health effects have been reported in the area. **Traffic proximity and NATA Diesel particulate matter** are also amongst the highest within the state, ranking at 94%ile and 87%ile, respectively (Census Block Group 090116905002)[7]. Proximity to contaminated sites such as **Superfund sites and waste facilities** are also amongst the highest, ranking at 84%ile and 74%ile within the State (Census Block Group 090116905002)[7]. **Lung cancer deaths** were also reported higher in New London (age-adjusted mortality rate of 47.22 compared to 39.12 for Connecticut). **Lead poisoning in children less than 6 years old is also high**; 3.4% of the children screened for lead has elevated lead levels compared to a 1.9% statewide.[6] The neighborhood has a record **Lead Paint Indicator** with about 80% pre 1960's housing, ranking at the 91%ile within the state (EJSCREEN, 0.25-mile radius from site)[7]. **Higher than average drug induced deaths** are manifested in the City, almost double the state average at 23.96 per 100,000 people compared to 13.34 for the State.[5] Our populations struggle with mental health problems; the **City's suicide rate** is almost 20% higher than the State.[5] **Motor vehicle accidents caused by substance abuses** are more than double in New London compared to Connecticut, indicating a community that is struggling with multiple issues. The reported disease rates and adverse health effects exhibited in the area are strong indicators of negative health impacts associated with poor environmental quality and welfare issues. The requested funds will address the environmental and health concerns of the community by removing contamination and blight from the disadvantaged neighborhood.

*(3) Promoting Environmental Justice*

Our target area is one of the most prominent examples of environmental injustice; poor, minority populations are compromised on environmental quality and health, and share the disproportionate impact of environmental contamination. **In a 0.25-mile radius around the Site, all 11 EJSCREEN's EJ Indexes rank at the 78-97%ile compared to the State, EPA Region 1, and the nation[7]**. Amongst the highest indexes are the EJ index for lead paint indicator and Superfund Proximity, which rank at the 92-97%ile for the state, region, and nationally. **The State has designated the area an environmental justice community given the distress and the hardship the community is facing[8]**. The residential neighborhood around the Site has been anticipating the cleanup and reuse of the Site for more than 20 years. The long-term contamination at the Site from decades of industrial activities has severely and disproportionately impacted the community, which is predominantly composed of people of color and low income populations. **With more than 65% people of color (82%ile within the State) and 64% low income populations (94%ile within the State),[7] our community is facing economic, environmental, and health challenges.** The requested funds **will promote environmental justice in the area by supporting the equitable development, providing access to green space and fresh food.** It is

[4] CT Department of Public Health (Asthma Data by Census Tract and Town, data 2010-2014)
[5] CT Data Collaborative http://data.ctdata.org/
[6] CT Department of Public Health (Childhood Lead Poisoning in Connecticut CY 2015 Surveillance Report)
[7] EPA's EJSCREEN tool
[8] CT Department of Energy and Environmental Protection, Environmental Justice Communities

anticipated that the redevelopment of the Site will **spur further economic development within the neighborhood that will bring justice** to our disadvantaged community.

**2.b. Community Engagement**

**2.b.i. Project Involvement & 2.b.ii. Project Roles**

Our key stakeholders outlined in the table below will be engaged in providing input and facilitating communication with respect to cleanup and redevelopment of the Site:

| Name of Organization | Point of Contact | Specific Involvement in the Project |
|---|---|---|
| Neighborhood Alliance Freedom Trail Neighborhood Association (FTNA) | Kathleen Barrett ftna1@yahoo.com | Community liaison; Community engagement through neighborhood surveys and meetings; Solicitation of community's input |
| Lawrence and Memorial Hospital (L + M) | Laurel Holmes Laurel.holmes@lmhosp.org | Donated resources for city purchase; provide input on redevelopment; facilitate communication and community outreach |
| FRESH New London | www.freshnewlondon.org | Provide input on redevelopment design that encourages youth involvement in community gardens; participate in community engagement |
| The City of New London Department of Economic Development | Tom Bombria, Comm. Development Project Coordinator 860-437-6346 tbombria@newlondonct.org | Assist with grant management; consultation on the project; Conduct community outreach; leverage financial and technical resources |
| Ledge Light Health District (LLHD) | Steve Mansfield | Risk communication of environmental health impacts; participate in community dialogue |

**2.b.iii. Incorporating Community Input**

The community will be reached through the community liaison, the Freedom Trail Neighborhood Association (FTNA). **Through FTNA, a series of questionnaires will survey the community to solicit public input**. FTNA has recently released a survey, the Freedom Trail Neighborhood Revitalization Survey in both English and Spanish to gather ideas on various redevelopment scenarios with respect to the park creation including accessibility, athletic and other activities that would be supported at the Site.

Community outreach will be performed through postings on the City's website; neighborhood flyers; local newspaper articles and appearances on a local cable TV program. Environmental data, report, and redevelopment plans will be made available to the public. **Public meetings held both by RCDA, the City of New London, and FTNA** will ensure that the proposed cleanup plan will and subsequent redevelopment have the support of community residents. During public meetings, **we will provide the opportunity to the public to answer**

**questions and offer suggestions, and a public comment period will promote input on decisions or concerns**. In addition, a **community mailing list** will be created to send out project information to residents via fliers/newsletters. Contact information will also be added to the community surveys and fliers so that individuals have several ways for their input to be received and responded to directly.

Due to COVID-19, public meetings to discuss the project's progress may be held in a **bimodal format with both virtual and in-person components**. Virtual sessions will offer the opportunity to engage populations that may not have been able to attend in-person meetings.

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

### 3.a. Proposed Cleanup Plan

The proposed cleanup activities to remediate the Site is outlined in the Alternative #3 of the ABCA. Based on the finding of the previous investigation, there are currently **two underground storage tanks (USTs) that would have to be located and removed from the Site**. **Soil impacted from UST releases will also be removed from the Site.** In addition the presence of SVOCs, pesticides and PCBs, and heavy metals in soils require remediation given that those exceed the Connecticut Remedial Standard Regulations (RSRs). The proposed redevelopment use of the Site as a park requires remediation to be performed according to Residential Criteria according to Connecticut RSRs. **Targeted soil excavation down to 4 feet of soil per CT's regulations, of approximately 1000 cubic yards of soil, targeting excavation in less than 50% of the 0.6-acre property,** to meet the definition of inaccessible soil and/or environmentally isolated soil according to the CT RSRs**. An approximate 1,500 tons of soil will be disposed to a permitted soil recycling facility or disposed at a permitted landfill is also included in the remedial activities**. Backfilling with clean soil including the placement of demarcation fabric, and placement and grading of >3-in topsoil are also included in the remedial activities. **An Environmental Land Use Restriction (ELUR) will be ordered according to State's regulations which prohibits soil disturbance.** Groundwater at the Site has not been impacted and therefore, groundwater remediation is not required. Site preparation including conducting additional pre-remedial testing, finalizing remedial action documents, and acquiring the necessary permitting are also required prior the cleanup activities.

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

| **Task/Activity 1: Cooperative Agreement Oversight** |
|---|
| i. Project Implementation: *Discussion of EPA-funded tasks/activities*: RCDA staff will attend regional workshops and conferences, and the annual National Brownfield Conference. *Non-EPA grant resources*: RCDA will provide management and coordination of the project, project reporting including ACRES database updates, procurement of a Qualified Environmental Professional/Licensed Environmental Professional (QEP/LEP), and coordination/meetings with project partners. *(RCDA in-kind contribution towards cost-share).* |
| ii. Anticipated Project Schedule: **Months 1-36.** QEP/LEP Oct-Dec 2022; quarterly progress reports and continuous ACRES updates; annual conference attendance; quarterly meetings. |
| iii. Task/Activity Lead: RCDA Staff |
| iv. Outputs: QEP/LEP procurement; quarterly progress reports; ACRES updates; conference attendance; meetings minutes. |
| **Task/Activity 2: Community Engagement** |

| |
|---|
| i. Project Implementation: *Discussion of EPA-funded tasks/activities:* Preparation of informational materials for public outreach and surveys to solicit community input. *Non-EPA grant resources:* RDCA and project partners will conduct community engagement including producing content for public outreach, semi-annual public meetings (bimodal and bilingual), incorporation of public input *(RCDA in-kind contribution towards cost-share).* |
| ii. Anticipated Project Schedule: **Months 1-36.** Continuous public outreach; semi-annual community meetings - 1st public meeting on Oct 2022, every 6 months thereinafter; semi-annual surveys. |
| iii. Task/Activity Lead: RDCA staff and project partners |
| iv. Outputs: Informational materials; flyers; website updates; meeting minutes; sign-in sheets; surveys. |
| **Task/Activity 3: Cleanup Planning** |
| i. Project Implementation: *Discussion of EPA-funded tasks/activities:* Activities will include additional pre-remedial testing including locating USTs; preparations of the final remedial action documents (RAP) and final ABCA, quality assurance project plan (QAPP), and enrollment to State's Brownfields Program. *Non-EPA grant resources*: Additional activities include the bidding documents and permitting to receive necessary regulatory approvals. |
| ii. Anticipated Project Schedule: **Months 3-9**. Pre-remedial testing (Jan-Apr 2023); Finalize RAP, ABCA and develop QAPP (Mar - Jun 2023); bidding documents (Jun-Aug 2023); permitting (Aug-Oct 2023); |
| iii. Task/Activity Lead: Contractual (QEP/LEP) with coordination from RDCA staff. |
| iv. Outputs: Additional Site Investigation; Final RAP; ABCA; QAPP; Bidding Docs; Permits. |
| **Task/Activity 4: Cleanup Activities and Reporting** |
| i. Project Implementation: *Discussion of EPA-funded tasks/activities:* The cleanup activities include: a) removal of two USTs; b) soil excavation, transportation, testing, and disposal; c) re-grading and site earthwork, and site preparation. *Non-EPA grant resources:* Additional activities include d) backfill with clean soil, e) preparation and filling of ELUR, f) field oversight and post-remedial sampling, and g) verification and grant closure reports. . |
| ii. Anticipated Project Schedule: **Months 10-36.** Cleanup activities (a, b, c, d) and placement of ELUR are anticipated to start on Nov 2023 and take approximately 12-20 months. Post-remedial sampling and verification/closure reports are anticipated to take place months 30-36. |
| iii. Task/Activity Lead: Contractual (QEP/LEP) with coordination from RDCA staff. |
| iv. Outputs: Removal of contaminated soil; Placement of ELUR; Abatement and cleanup in accordance with RAP and ABCA; Site preparation; Verification and closure reports. |

**3.c. Cost Estimates**

| **Budget Categories** | | **Task 1** | **Task 2** | **Task 3** | **Task 4** | **Totals** |
|---|---|---|---|---|---|---|
| **Direct Costs** | Personnel | - | - | - | - | **-** |
| | Fringe Benefits | - | - | - | - | **-** |
| | Travel | $3,000 | - | - | - | **$3,000** |
| | Equipment | - | - | - | - | **-** |
| | Supplies | - | - | - | - | **-** |
| | Contractual | - | - | $40,000 | $571,000 | **$611,000** |
| | Meeting Expenses | - | $1,000 | - | - | **$1,000** |

| | | | | | |
|---|---|---|---|---|---|
| **Total** | $3,000 | $1,00 | $40,000 | $571,000 | **$615,000** |
| **Total Direct Costs** | $3,000 | $1,000 | $40,000 | $571,000 | **$615,000** |
| **Indirect Costs** | - | - | - | - | **-** |
| **Total Federal Funding** | **$3,000** | **$1,000** | **$40,000** | **$571,000** | **$615,000** |
| **Cost share** | $11,000 | $7,000 | $10,000 | $95,000 | **$123,000** |
| **Total Project Budget** | **$14,000** | **$,8,000** | **$50,000** | **$666,000** | **$738,000** |

| **Cost Breakdown** |
|---|
| **Task/Activity 1: Cooperative Agreement Oversight** |
| **Task 1 activities are estimated at $14,000 for both requested and non-requested EPA funds. A total of $3,000** is budgeted for RCDA staff to attend workshops and National Brownfields Conference are budgeted (total $3,000: 1 person; 2 conferences @ $500 per airfare and $250/day/person for lodging and meals for 4 days). The **cost share for Task 1 ($11,000)** is provided by RCDA and City staff time to manage the program and organize the activities ($11,000: 183 hours @ $60/hour) (towards 5% admin costs). |
| **Task/Activity 2: Community Engagement** |
| **Task 2 activities are estimated at $8,000for both requested and non-requested EPA funds. A total of $1,000** is budgeted for outreach materials (fliers, fact sheets) and meeting costs ($400 for materials, $600 for 6 meetings at $100/meeting). The **cost share for Task 2 ($7,000)** is provided by the RDCA and City staff time to conduct engagement/outreach (total $8,000: 116 hours of work @ $60/hour) (towards 5% admin costs). |
| **Task/Activity 3: Cleanup Planning** |
| Task 3 Activities for site preparation of cleanup are **at $50,000 for both requested and non-requested EPA funds.** Planning activities for both sites include enrollment to State's Brownfields Program @ $5,000, pre-remedial testing @ $10,000, assess of 2 USTs @ $5,000, preparation of the final RAP and ABCA, and quality assurance project plan (QAPP)@ $20,000. The **cost share for Task 3 is estimated at $10,000** for bidding documents and permitting which will be prepared by RCDA and City staff, estimated at 167 hours @60/hour (towards programmatic costs). |
| **Task/Activity 4: Cleanup Activities and Reporting** |
| Cleanup Activities are estimated **at $666,000 for both requested and non-requested EPA funds. Federal request at $571,000:** specific activities include removal of two USTs @ $35,000; soil excavation, transportation, testing, and disposal and backfilling @ at $536,000 including re-grading, and site earthwork and 20% contingency; The **cost share requirement for Task 4** will be covered by an additional $95,000 to dispose some of the contaminated soil and backfill with clean soil at $35,000, prepare and file the ELUR at $15,000, field oversight and post-remedial sampling at $30,000, and verification and grant closure reports at $15,000. The cost-share for this task will be provided by a cash commitment of $85,900 and $9,100 estimated as 150 hours by RCDA staff to prepare the grant closure report @$60/hour. |

**d. Measuring Environmental Results**

RDCA staff will track and evaluate the project's progress. The project schedule and goals will be met in accordance with the agreement and entering site information into the **ACRES database**. **An output tracking spreadsheet report will be created and charted on a monthly**

**basis throughout the grant period to track project milestones including contract bidding, remedial tasks, and community meetings. Progress will also be reported through quarterly project management and financial reports**. RDCA staff will also evaluate the project's performance and outcomes including **the quantity of contaminated soil removed and the acreage of land remediated and revitalized**. Overall project outcomes will be tracked by estimating the number of acres of greenspace created, the minimized exposure to hazardous substances, and employment opportunities available for the local community.

## 4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

**Provide responses for the organization that is applying for funding.**

**a.i, a.ii. Programmatic Capability**

The Renaissance City Development Association (RCDA) is the not-for-profit development arm of the City of New London. RCDA is governed by a board of directors and is staffed by an Executive Director, Peter Davis and Project Coordinator/CFO, Jenny Wronowski. It should be noted that RCDA will be coordinating the tasks associated with this grant with City of New London Community Development Coordinator and Brownfields Project Manager Tom Bombria along with the City Finance Department. **The City shall act as fiduciary manager as it did for RCDA's previous successful FY2014 EPA $400,000 clean up grant through an MOU to administer, account for, and monitor funds.** Ms. Wronowski has been employed by RCDA as a project manager for over 20 years, with direct oversight of multiple brownfield assessment and remediation grants related to the 2000 Fort Trumbull Municipal Development Plan. Mr. Davis was the Planning director and the designated brownfield coordinator/grants manager for 17 years in Norwich, CT, responsible for the management of all aspects of federal and state brownfield projects. Mr. Bombria has over 17 years of experience administering EPA, HUD, and State grants.

iii. Acquiring Additional Resources

A Qualified Environmental Professional Contractor will be hired through procurement for direct clean up activity oversight. All remediation procurement will comply with City, State and Federal policies. Federal American Rescue Plan funds have been dedicated to support environmental remediation projects by City Council for this project as needed.

**b. Past Performance and Accomplishments**

i. Currently Has or Previously Received an EPA Brownfields Grant

(1) Accomplishments

Successful Assessment work has led to cleanup grants. Cleanup implementation at Parcel C1 and C2 resulted in the RCDA and the City being able to leverage a $30M, 190 unit market rate residential housing project. Construction began in 2021 and is expected to be completed in late 2022. Assessment work at the former city owned urban renewal Parcel J sold for private investment and development of a recently completed a 140 unit market rate housing development.

(2) Compliance with Grant Requirements

No adverse audit findings were received from any of the work completed by our brownfield staff managers. The RCDA and the City of New London have completed several successful Brownfield assessments and the FY14 400,000 clean up grant. Grant implementation was conducted in compliance with the reporting work plan, and scheduling requirements, with approved modifications. All proper submittals and reporting were completed and the grants fully completed all objectives and goals. The ACRES database was continually maintained and updated for the projects when required.

**FY22 EPA Cleanup Grant Application Threshold Criteria**

1. **Applicant Eligibility**

Renaissance City Development Association, Inc. (RCDA) is the not-for-profit development agency for the City of New London (See attached bylaws)

2. **Previously Awarded Cleanup Grants**

The site has not received a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds**

The applicant affirms it does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership**

Renaissance City Development Association, Inc. Acquired 11/24/21 and will retain ownership for the duration of the grant period.

5. **Basic Site Information**

Hempstead Park, 43 Hempstead Street, New London, CT 06320, RCDA

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

a) The site is contaminated by hazardous substances. d)The area appears to have been a low-lying wet area which was likely partially filled with coal ash so it could be developed. Various manufacturing businesses from the 1800's-1988 likely contributed to the contamination at the site, particularly the previous laundry/dry cleaning facility and its use of petroleum-based cleaning chemicals. Use of coal as a fuel source and the potential presence of related coal ash represents a REC due to the possible presence of metals and PAHs associated with coal ash. This property has been abandoned since 1988, when Cresent Communications last ran an electric instrument manufacturing operation. Several environmental assessments of the Site have been completed since the early 2000s, the most recent in August of 2021. During the latest Phase I site investigation, an 8,000-gallon underground storage tank installed in 1957 and a 5,000-gallon tank from 1939 were determined to be still present on the property. Historical uses of coal as building fuel indicate metals and polyaromatic hydrocarbons (PAHs) associated with coal ash. There is also a documented release of 100 gallons of chemicals and petroleum in one of the buildings in 1997 with no remedial action. In September of 2021, soil contamination present was confirmed through soil borings. It included the presence of Semi-Volatile Organic Compounds (SVOCs), including benzene compounds, Pesticides and Polychlorinated Biphenyls (PCBs), heavy metals, which exceeded the Connecticut remedial standard regulations for residential use, including soil and groundwater pollutant mobility criteria.

7. **Brownfields Site Definition**

This vacant underutilized site with known and unknown hazards is considered a **brownfield site as defined in CERCLA § 101(39)** as real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of hazardous substances, pollutants, contaminants, controlled substances, petroleum or petroleum products, or is mine-scarred land.

The site is not listed or proposed for listing on the National Priorities List; the site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA; and the site is not subject to the jurisdiction, custody, or control of the U.S. government.

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

Delta Environmental completed a Phase II ESA and a draft RAP in 2000 and 2001. KGSNE completed an ASTM Phase I ESA in August of 2021, and submitted a report of findings from an EPA Targeted Brownfields Assessment on November 15,2021. This report includes data and summaries of Phase II investigations and Remedial Alternative Recommendations and cost estimates (Analysis of Brownfields Clean Up Alternatives).

**9. Enforcement or Other Actions**

There are no known ongoing or anticipated environmental enforcement actions on this site.

**10. Sites Requiring a Property-Specific Determination**

This site does not require a property-specific determination

**11. Threshold Criteria Related to CERCLA/Petroleum Liability**

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

**iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY**

**(1) <u>Bona Fide Prospective Purchaser Liability Protection</u>**

The Renaissance City Development Association (RCDA), the applicant, acquired the property through a quick claim deed transfer of property from the City of New London on November 24, 2021. The RCDA is now sole owner of 43 Hempstead St as recorded on land records.
The RCDA is the not-for-profit development agency for the City of New London. The primary role that RCDA serves, as agent for the City, rests with the implementation and management of the 2000 Fort Trumbull Municipal Development Plan. The City also solicits technical advice from RCDA relative to proposed development and brownfield projects. The RCDA does not have any direct contractual or financial relationship with the City of New London. The funding to implement and manage the Fort Trumbull Municipal Development Plan came entirely from the State. Having said that, at various times since 2016 the City has allocated funds for specific contractual projects. Much like they would solicit other contractual services for consultation/project management.

KGSNE JV, LLC (KGSNE) completed and submitted a Phase I Environmental Site Assessment (ESA) on August 10, 2021 on a parcel at 43 Hempstead Street in New London, New London County, Connecticut (the Site). KGSNE conducted this Phase I ESA for the U.S. Environmental Protection Agency (EPA) to support due diligence activities related to redevelopment of the property by the City of New London (the City). KGSNE performed a Phase I ESA in conformance with the American Society for Testing and Materials (ASTM) E1527-13, “Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process”.

The City of New London had acquired 43 Hempstead Street from SHILO Development Corporation in June of 2020 without having completed an updated Phase I ESA. The EPA’s Targeted Brownfield Assessment Program supported an updated Phase I in the summer of 2021.

A lack of resources to clean up this long vacant blighted property required the transfer of this property to the City nonprofit development agency and community partner, RCDA, in order to be eligible for potential funding through the EPA Brownfields Cleanup Grant Program.
A fence surrounding this site is intended to prevent and limit exposure to any previously released hazardous substances until the proper remediation can be completed to provide an open, clean and safe green space for the neighborhood.

The applicant affirms a commitment to:
(i) comply with any land use restrictions and not impede the effectiveness or integrity of any institutional controls;
(ii) assist and cooperate with those performing the cleanup and provide access to the property;
(iii) comply with all information requests and administrative subpoenas that have or may be issued in connection with the property; and
(iv) provide all legally required notices.

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

Not a petroleum site

**12. Cleanup Authority and Oversight Structure**

The applicant will comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment.

a. The property has been accepted into the State of Connecticut Abandoned Brownfield Cleanup Program (11/22/21). And as required under CGS 32-768 (f) will enter and remain in the Voluntary Remediation Program until the property is remediated. . The property will be remediated according to CT Remediation Standard Regulations (RSRs) section 22a-133k of the Regulations of Connecticut State Agencies (RCSA).

b. No adjacent property access is anticipated but, if necessary, the applicant will seek an access agreement with any adjacent property owners.

**13. Community Notification**

The community was notified of the applicant's intent to apply for an EPA Brownfields Cleanup grant as part of the agenda for a public hearing and at a regularly scheduled City Council meeting posted on the city website on November 10, 2021. And, with an ad in the local paper on November 13, 2021.

**a. Draft Analysis of Brownfield Cleanup Alternatives**

A draft Analysis of Brownfield Cleanup Alternatives is attached as part of the Targeted Brownfields Assessment prepared for US EPA by KGSNE

**b. Community Notification Ad**

The community was notified of a draft application and draft ABCA available for public review and comment, by an ad in the local paper on November 13, 2021.

Notification was also placed on City Website on November 10, 2021 as part of the agenda for the meeting on November 15, 2021

**c. Public Meeting**
A Public Hearing/ meeting was held at 6:45 on November 15, 2021 before a regularly scheduled City Council meeting. Discussion and public commenting was also available during council meeting.

**d. Submission of Community Notification Documents**
**see attached notification docs including a summary of community notification and comments, and draft ABCA**

**14. Statutory Cost Share**
The applicant RCDA, and the City of New London will enter into an MOU for the City to act as the fiduciary manager for the EPA grant if awarded. The City of New London has approved a contribution of municipal funds towards the required cost share. Additional cost share will be met through in kind services as described in the cleanup grant application narrative and in the attached narrative information sheet. City staff and RCDA staff share share duties and responsibilities for program administration and for
a. A signed **cost share commitment letter** is attached along with city council approval of the cash match in the form of a **signed executive summary** from council president.
b) A hardship waiver is not requested.

**15. Waiver of the $500,000 Limit**
The applicant is requesting a waiver of the $500,000 limit. See **attached waiver application.**

**16. Named Contractors and Subrecipients**
No contractors or subrecipients have been identified. Applicant will follow all state and federal requirements for procurement.