Town of Stafford

Connecticut

Office of Selectmen
1 Main Street
Warren Memorial Town Hall
Stafford Springs, CT 06076-1208
Telephone (860) 684-1777 * Fax (860) 684-1785

Sal P. Titus
Kurt Vail
Richard F. Hartenstein Jr.
Board of Selectmen

R01-22-C-026

FY2022 Brownfields Cleanup Grant Application
RFP No.: EPA-OLEM-OBLR-21-06

Narrative Information Sheet

1. **Applicant Information**
   Stafford, Town of
   1 Main Street
   Stafford, CT 06076

2. **Funding Requested**
   a. Grant Type: Single Site Cleanup
   b. Federal Funds Requested:
      i. $650,000
      ii. We are not requesting a cost share waiver
      iii. We are requesting a waiver of the $500,000 limit

3. **Location**
   a. Stafford
   b. Tolland
   c. Connecticut

4. **Property Information**
   Former Earl M. Witt Intermediate School
   20 Hyde Park Road, Stafford, CT 06076

5. **Contacts**
   a. **Project Director:**
      Name: Amber E. Wakley, Grants & Marketing Specialist, Town of Stafford
      Phone: (860) 851-8102
      Email: amberw@staffordct.org
      Mailing Address: 1 Main Street, Stafford, CT 06076

   b. **Chief Executive/Highest Ranking Elected Official**
      Name: Salverio P. Titus, First Selectman, Town of Stafford
      Phone: (860) 684-1777
      Email: firstselectman@staffordct.org
      Mailing Address: 1 Main Street, Stafford, CT 06076

6. **Population**
    a. 11,472 (Source: 2020 Decennial Census)

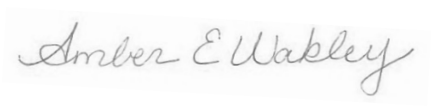
7. **Other Factors**

Other Factors	Yes/No	Page #
Community population is 10,000 or less.	No	n/a
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No	n/a
The proposed brownfield site(s) is impacted by mine-scarred land.	No	
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.	Yes	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).	Yes	2
The proposed site(s) is in a federally designated flood plain.	Yes	1 - 2
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Yes	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Yes	3
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2011 or later) or is closing.	No	n/a

8. **Letter from the State or Tribal Environmental Authority**
   See attached letter from Mark Lewis of the CT Department of Energy and Environmental Protection (CT DEEP).

9. **Releasing Copies of Applications**
   N/A

Best Regards,



Amber Wakley
Grants & Marketing Specialist
Town of Stafford

NARRATIVE INFORMATION SHEET ATTACHMENT

Letter from State Environmental Authority

Connecticut Department of
ENERGY &
ENVIRONMENTAL
PROTECTION

79 Elm Street • Hartford, CT 06106-5127 www.ct.gov/deep Affirmative Action/Equal Opportunity Employer

November 22, 2021

Ms. Amber Wakley
Grants & Marketing Specialist
Office of Grants & Marketing
Town of Stafford
1 Main Street
Stafford, CT 06076

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

Dear Ms. Wakley:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Town of Stafford intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2022. The Town of Stafford plans to use the grant funding for cleanup of hazardous substances at its property at its property known as the Earl M. Witt School, located at 20 Hyde Park Road in Stafford, Connecticut.

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, the Property Transfer Program, (if applicable) pursuant to CGS §22a-134, the Urban Sites Remedial Action Program pursuant to CGS §22a-133m, or the Brownfields Remediation and Revitalization Program pursuant to CGS §32-769.

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) 424-3768 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)

Town of Stafford, Connecticut
FY 2022 EPA Cleanup Grant Application

NARRATIVE

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

1.a. Target Area and Brownfields

1.a.i Background and Description of Target Area - A traditional New England mill-town, Stafford is one of the small and rural Connecticut towns that maintain their colonial character. The Town's natural beauty and famous mineral springs have attracted settlers into the area since its incorporation in 1719. Today, Stafford is an attractive destination for tourists, gathering events and seasonal residents, which attract thousands of people every year. With access to all major northeast metropolitan areas including New York and Boston, Stafford's central location is appealing to both families and businesses. Although Stafford is the third largest town in the State in terms of land area, it maintains a small community feeling (less than 12,000 residents). A well-developed downtown, commercial corridor, a growing residential community, and unique industrial resources, Stafford is an ideal location for both recreational and business activities. **Like most of New England, Stafford's industrial past was anchored in manufacturing and river mills, leaving behind numerous contaminated and dilapidated properties.** The colonial character of the Town fostered major industrial activities since the 1850s and early 1900s, establishing the Town as one of the largest industrial communities for cotton and wool, machinery, metal products, and others. Today, Stafford is home to major manufacturers such as TTM Technologies, 3M, and American Woolen Company which are large parts of the current industrial culture that have continued to utilize industrial-era mills. **Once most of these industries closed down in the following years, they left behind abandoned and underutilized properties and the Town experienced significant economic hardship. Today the residents of Stafford are forced to cope with lasting environmental, economic, and health risks associated with these brownfield sites.** Plagued by environmental and welfare challenges, the residents of the Town are in desperate need of economic growth.

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

1.a.ii. Description of the Brownfield Site - The Site is in Stafford's 157-acre Hyde Park, behind Main Street and Connecticut Route 32 and Route 190. **The Site is currently located in a flood plain, but the building is not** (zone B: areas between limits of 100-year flood and 500-year flood) and in near proximity to a pond. The Site was initially Isaac P. Hyde's mansion and then was transferred to the Town of Stafford in the early 1900s. After 1937, the site was remodeled to the Witt School, which first operated in 1939. The vacant, two-story approximate 20,200 square-foot, brick, slab-on-grade structure includes a parking lot area. The building was decommissioned by the Board of Education in 2007 with the responsibility given to the Board of Selectmen. Over the past year, the Stafford Historic Commission, State Historic Preservation Office representatives, Connecticut Trust for Historic Preservation, and Town Selectmen have attempted to determine a reuse plan which preserves the site's historical integrity. **Graffiti, vandalism, and other signs of trespassing and criminal activity are present. The main environmental concern at the Site is the presence of hazardous building materials**. Several Hazardous Building Material (HBM) assessments have been performed at the Site. In 1991 and 2010, Asbestos Containing Materials (ACM) were found in interior rooms including classrooms, offices, stairwells, cafeteria, bathrooms, and other areas. ACM was also found in the pipe insulation and pipe fittings, and on the exterior, in window glazing, the gym roof and the 1953 roof. **Lead paint was also identified on brick walls, window frames, and on doors in the building.** In December 2020, a limited HBM investigation included sampling for Polychlorinated Biphenyls (PCBs) in caulk, and to evaluate if PCBs were present in air within the building. PCB-containing

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

1.b. Revitalization of the Target Area

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

As part of Stafford's Brownfields Initiative, the Town has an active community survey garnering more than 300 responses that provide feedback on community development needs and ideas for redevelopment uses of the former Witt School. The town also issued a Request for Interest, Ideas, and Innovation to prospective developers. **The most favored redevelopment scenarios derived from community input included improving access to food, public recreational amenities, and affordable senior housing.** The project is a mixed-use, mixed-income building utilizing the bottom floors to create a permanent farmers/cooperative market, including a farm-to-table dining experience. The vision appeals to Stafford's rich agricultural heritage and robust farming community, while generating a hub for social activity to promote economic growth. **Given that Target Area is a USDA-designated food desert, the suggested reuse would ameliorate the desert conditions by providing access to affordable and nutritious food. The proposed mixed-use space retains the existing gymnasium and kitchen, developing space for much-needed recreation and entertainment opportunities while providing a legal space for farmers and entrepreneurs to pursue certified food ventures.** In addition, and **partnership with the Stafford Housing Authority, the upper floor would be converted into affordable senior housing with an adult day care center**. Up to 35 units of affordable housing for seniors is envisioned, with shared access to the gymnasium and kitchen to augment activities for the adult day care center.

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

1.b.ii. Outcomes and Benefits of Reuse Strategy - Stafford's revitalizing strategy will stimulate economic development by providing an **avenue for the town's farming community and increasing the Target Area and local community's property values**. The funds requested will help to transform the blighted property within the heart of downtown Stafford into a space that the whole community can take pride in. The Site currently poses a hazard to human health and the environment, including asbestos, PCBs, and lead HBM. The cleanup and reuse of the site will remove these hazardous substances, allow for the beneficial reuse of this beloved community building, **stimulate economic development by providing vending opportunities to small businesses and farmers in the area**. **In addition, the proposed project will also provide critically needed senior affordable housing and adult day care center**. Adult Day Centers are necessary for persons with cognitive impairments that cannot stay in their homes during the day while their families are working. These reuse strategies includes

social and health benefits for residents of Stafford, provide easy access to locally grown, organic, and healthy food while providing a social connection to the seniors, farmers, and rest of the community. The proposed redevelopment will encourage a sense of community among residents, and attract visitors from nearby towns. Reuse of the Witt school will greatly add to the utility of the town by helping to round out the community center and "Main Street" attractions which sit in close proximity to the school. Furthermore, reuse will serve as a catalyst in the effort to revitalize many of the other potential brownfield locations within the town. With some brownfields being located on the river which runs through the town, further **revitalization could provide opportunities for renewable hydro-energy sources and new renewable energy developments**. The proposed site redevelopment is **< ¼ mile from the EJ community** (Block Group 1, Census Tract 8901), and the **requested EPA funds and site redevelopment would directly benefit disadvantaged communities and Seniors in Town**. The addition of a sustainable, locally stocked farmers market would also complement EJ community objectives.

1.c. Strategy for Leveraging Resources

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

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

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT

2.a. Community Need

2.a.i. The Community's Need for Funding - Stafford's small, rural character lends to its beauty, however, it limits its capacity and resources to fund brownfields remediation. This is reflected in the **Municipal Grand List per Capita, which is only 65% of the State Average**, and the **municipal debt per capita, which is 108% of the state average**.[1] Our community's population is decreasing; since 2010, there has been a **5.1% decrease in Stafford's population, further reducing the tax base and town revenue** (2021 Equity Profile). Stafford has an average mill rate of 34.95, which means that the real estate tax revenue is moderate and barely sufficient to cover the municipal budget for essential services. **The median household income is $74,386, which is below the state average**. Stafford particularly struggles with pockets of **poverty in the Target Area where 27% of households were below the poverty level, compared to 6% average across the town, and 10% average across the state**[2]. **The Target Area has also suffered from persistently higher unemployment rates, averaging 12%, compared to 5% across Tolland County in the same period 2014-2018.** This is linked to the low number of jobs in the vicinity (~3,000), requiring reliable transportation and significant travel times for most residents

[1] Ctdata.org
[2] 2014-2018 ACS, EJSCREEN

(median ~30 minutes), and disproportionately impacting poorer people with limited mobility. 6% percent of households in Stafford do not have a vehicle[3] and thus limited access to jobs and resources. Overall, the Town of Stafford is focusing its limited resources to provide basic services to its constituents, who have been plagued by years of economic stagnation and further hurt by the COVID-19 pandemic. Investment in the community through cleaning up of brownfields such as the Witt School is crucial to support economic growth, revitalization and maintain the character of the region. Furthermore, in 2012, a leak from a 10,000-gallon underground storage tank (UST) occurred at the Witt School, impacting soil and surface water of the nearby pond. The town had to fully cover the expense of the emergency cleanup at a cost over $50,000, increasing the financial burden on its residents.

2.a.ii. Threats to Sensitive Populations

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

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

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

[3] DataHaven, 2021 Equity Profile
[4] DPH Asthma Surveillance Program
[5] DataHaven, 2021 Equity Profile
[6] USDA Food Access Research Atlas

including lead abatement by landlords and other property owners, reduce exposure to contaminants, decrease rates of disease and adverse health conditions, and be a source of nutritious food for area residents and visitors.

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

2.b. Community Engagement

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

Partner Name	Point of Contact (name, email & phone)	Specific role in the project
Stafford Housing Authority	Ann Marie Perrone aperrone@staffordha.com (860) 684-4973	Partner to support the redevelopment and help with leveraging resources.
Agriculture Advisory Commission	Dr. David Mordasky [redacted] (860) 729-7921	Participation in reuse planning, and communication throughout the remediation process.
Economic Development Commission	John Wittenzellner john.w@utilitygroupholdings.com (860) 559-2983	Lead community involvement and solicitation of resident input. Participation and input in reuse planning.
North Central District Health Department	Westford Lirot, B.S. R.S. wlirot@ncdhd.org (860) 684-5609	Assistance with health risk communication with public.
Historic Advisory Commission	Leonard Clark lvclarkey@cox.net (860) 684-3246	Advisement of historical resources/preservation, regulatory review.
Stafford Community Center	Grace Parrow parrowg@staffordct.org (860) 684-3906	Assistance with community engagement, venue for meetings.

In order for any redevelopment plans to truly have a positive impact for the town, the neighborhood residents must be informed, involved, and represented during the whole process. ***The town is equipped with many strategies for community involvement; with a primary focus on disseminating project-related communications and hosting open town meetings at the Stafford Community Center***, a centralized location. To help create a vision and development that promotes cohesive excitement, Stafford will solicit professional facilitation services, from organizations like the Connecticut Economic Recourse Center. Working with Stafford-based groups identified above, as well as the Board of Finance and Planning and Zoning Commission, Stafford will further ensure meaningful and wide-spread involvement of local leaders, residents, staff, and stakeholders.

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

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

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

3b. Description of Tasks/Activities and Outputs

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

TASK #1 - COOPERATIVE AGREEMENT (C.A.) OVERSIGHT
EPA-funded activities: Management and execution of C.A. oversight : EPA Reporting (ACRES, MBE/WBE, FFR and Quarterly Reports, Close Out); procurement and management of a qualified environmental professional (QEP); maintaining financial records and completing drawdowns; maintaining project files and information repository; project coordination with stakeholders; Site Eligibility Determination Forms; compliance with Section 106 Historic Preservation Act, as applicable; quarterly Steering Committee meetings, ensuring the program remains on schedule/budget. Travel and attend National Brownfields Conference.
Non-EPA grant resources needed to carry out task: Town will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted.
Anticipated Project Schedule: Town will competitively procure QEP by 12/31/22. Kick off program January 2023. Quarterly Reports submitted within 30 days after the end of each reporting period (Jan / April / July /

Oct). Annual FFR and M/W/DBE reports submitted by October 30 of each grant year. ACRES updated when cleanup is started, at a minimum of quarterly intervals, and other major project milestones. Quarterly Steering Committee meetings. Final Closeout report submitted within 90 days of the end of cooperative agreement.
Task/Activity Lead(s): Town will lead this task in coordination with and assistance from the QEP, who will provide technical and programmatic assistance, including eligibility forms, QRs, ACRES, etc.
Output(s): EPA Reporting (ACRES, 3 annual FFR & M/W/DBE reports, 12 QRs, Closeout Report, etc.), RFQ for QEP, procure QEP, grant drawdown requests, 12 Steering Committee Meetings, general C.A. oversight and management and attendance at National Brownfields Conference.
TASK #2 - COMMMUNITY OUTREACH & ENGAGEMENT
EPA-funded activities: Town will lead efforts to inform and engage the Target Area and local community throughout project implementation. Outreach materials will be posted on the Town's website and social media platforms. The QEP will prepare a community relations plan (CRP) in collaboration with the Town which will detail the steps ensuring adequate public notice and opportunity to comment on key plans and documents. An administrative record will be established and also posted to the Town's website. Notice of the updated ABCA and CRP will be presented at a public meeting, published with a 30-day comment period for community stakeholders to respond. Written responses to public comment will be incorporated into the administrative record. The Town anticipates completing a minimum of three (3) public meetings.
Non-EPA grant resources needed to carry out task: Town will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted.
Anticipated Project Schedule: Community Outreach activities are expected to commence Winter/Spring 2023 and occur over the lifetime of the grant. Town anticipates completing a minimum of three (3) public meetings to occur at key project stages: ***Spring 2023*** (presentation of CRP/ABCA), ***Fall/Winter 2023*** (pre-cleanup / reuse planning); and ***Fall / Winter 2024*** (post - cleanup).
Task/Activity Lead(s): Town will lead community engagement activities. QEP will be the Town's partner and will provide technical documents, support and expertise and other community outreach assistance.
Output(s): Community Relations Plan (CRP), draft ABCA, outreach materials, website/social media updates, public notices, meeting presentation materials, administrative record and coordination with project partners and stakeholders. A minimum of three (3) public meetings. Engage Target Community and general public.
TASK #3- SITE SPECIFIC CLEANUP ACTIVITIES
EPA-funded activities: The QEP will prepare key documents in preparation for cleanup implementation, including the final ABCA/cleanup plan, Health and Safety Plan (HASP), QAPP, and notification and coordination with CT DPH. The QEP will prepare plans and specifications that the Town will use to put the remediation project out to public bid in order to competitive procurement a cleanup contractor. The QEP will provide bid support during the competitive procurement process. When selected, the contractor will implement the specified cleanup tasks with oversight from the QEP. The QEP will conduct oversight of cleanup activities.
Non-EPA grant resources needed to carry out task: Town will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted.
Anticipated Project Schedule: ***Spring/Summer 2023***: Complete QAPP, HASP, final ABCA and notification. ***Winter 2023****:* complete cleanup plans and specifications, issue invitation for bids for cleanup contractor. **S*pring 2024:*** procure cleanup contractor. **Summer 2024:** Commence cleanup / abatement activities. ***Fall 2024*****:** Complete removal / abatement of ACM, PCB and lead impacted HBM at Site.
Task/Activity Lead: The Town will lead procurement of the cleanup contractor with QEP support. The QEP will generate all cleanup planning documents. The procured licensed cleanup contractor will implement the specified cleanup tasks with QEP support and oversight.
Output(s): Final ABCA, HASP, QAPP, plans and bid specifications, FRP for environmental contractor, completion of remedial activities and site ready for reuse.

TASK #4 - CLEANUP OVERSIGHT
EPA-funded activities: During remedial activities, the QEP will perform oversight activities to ensure remedial actions are completed in accordance with the EPA approved ABCA / cleanup plans and meet applicable statewide standards and requirements. The QEP will conduct confirmatory sampling to document post-remedial conditions. QEP will document activities in the Cleanup Completion and Closure Report.
Non-EPA grant resources needed to carry out task: Town will provide in-kind services in the form of staff time for any additional cooperative agreement oversight activities beyond those that have been budgeted.
Anticipated Project Schedule: Commence Summer 2024. Cleanup activities and oversight are expected to occur through Fall 2024. Final Cleanup Completion report are anticipated in Winter 2024. Town is confident all work can be completed within 3 years.
Task/Activity Lead(s): The QEP will provide oversight of site cleanup activities to document compliance with applicable state and federal requirements.
Output(s): Cleanup Completion and Closure Report. Site ready for reuse.

3c. Cost Estimates

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

Task 1: Personnel = $3,500 (70hrs x $50/hr); Brownfield Conference – 2 attendees (travel, lodging, per diem @ $1,500pp) = $3,000; Contractual - General Oversight Assistance, Quarterly Reports (12) and ACRES updates = $7,000 (70hrs @ $100/hr average). **Task 2:** Personnel = $3,500 (70hrs x $50/hr); Contractual = $8,000 [(~$1,500/mtg x 3 public meetings = $4,500) + $3,500 for CRP, draft ABCA and production of technical and/or outreach materials (35 hrs @ $100/hr average)]. **Task 3:** Contractual: $542,500 [QEP = $27,500 (275 hrs @ $100/hr average for: Final ABCA; QAPP; and technical plans and specifications) + HBM Remediation Contractor $515,000 {(35,000sf impacted plaster x $10/sf = $350,000) + (11,940sf of impacted tiles x $4/sf = $47,600) + (45 window glazing x $350/ea = $15,750) + (3,357sf insulation x $30/sf = $100,710) + (100lf mastic x $7.8/lf = $780)}].**Task 4**: Contractual = Cleanup/Completion Reports = $82,500. [QEP = $82,500 (825 hrs @ $100/hr average) for remediation oversight services (~425hrs) and regulatory cleanup and completion reporting (~400hrs) related activities]. **Cost Share** – The Town will provide a total match of $130,000 ($123,000 in cash contributions of municipal funds towards cleanup related activities plus $7,000 of in-kind, personnel services for oversight).

	Task 1 Cooperative Agreement Oversight	Task 2 Community Outreach & Engagement	Task 3 Site Specific Cleanup Activities	Task 4 Site Cleanup Oversight & Cleanup Completion Reports	Total
Personnel	$3,500	$3,500	$ -	$ -	**$7,000**
Fringe	$ -	$ -	$ -	$ -	**$ -**
Travel	$3,000	$ -	$ -	$ -	**$3,000**
Contractual	$7,000	$8,000	$542,500	$82,500	**$640,000**
Total Direct Costs	$13,500	$11,500	$542,500	$82,500	**$650,000**
Indirect Costs	$0	$0	$0	$0	**$0**
Total Fed. Funding	$13,500	$11,500	$542,500	$82,500	**$650,000**

Cost Share	$ -	$ -	$126,500	$ 3,500	**$130,000**
Total Budget	**$13,500**	**$11,500**	**$ 669,000**	**$ 86,000**	**$780,000**

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

4. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

4a. Programmatic Capability

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

4.a.ii. Description of Key Staff – The Grants & Marketing Specialist, **Amber Wakley**, **will serve as the Project Manager** and have direct oversight of the program. She has a proven ability to effectively manage and administer state and federal grant programs, including the FY19 EPA Brownfields Assessment Grant. Amber maintains and tracks grant requests and reporting, and is responsible for helping develop the Town's economic development and community engagement activities. Additionally, she maintains strong relationships with residents, town boards and commissions, and property owners. Understanding the complexities of the project, the Town has developed a diverse team for active oversite. **Dave Perkins**, the Land-use Technician and Code Enforcement Officer, has over 40 years of experience in land use matters and geographical information systems. He staffs the Planning and Zoning Commission, Inland Wetlands Commission, and the ZBA. He has been actively involved in implementing the current FY19 EPA Brownfield Town-wide Assessment Grant. Besides being a licensed Connecticut building official for over 19 years, the Town's Building Official, **Glen Setzler**, offers extensive professional and practical expertise. Glenn has worked in mid-sized architectural firms for over 20 years. He has an in-depth understanding of state building and fire codes, excellent project management skills, and experience with all phases of construction. Accomplishments include the Dutch Point Redevelopment project in Hartford valued at approximately $73M. As the Director of Public Works, **Devin Cowperthwaite**, is responsible for the management of the Highway Department, Parks Department, and Transfer Station. He oversees a $2.43M annual municipal budget and administers local, state, and federal funds, including LOTCIP, LOCIP, State Local Bridge Program, and Federal Bridge Program grant funding. The Town's Chief Financial Officer, **Lisa Baxter**, Chief Financial Officer - will be responsible for accounting practices to ensure compliance, and that funds are expended and drawn down in a timely and efficient manner. She has a working knowledge of reporting and financial procedures for state and federal grant processes.

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

4.b. Past Performance and Accomplishments

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

(1) Accomplishments - The Town of Stafford received a **$300,000 FY19 EPA Brownfields Community-wide Assessment Grant** and is currently facilitating the grant, **Period of Performance: 10/1/2019 - 9/30/2022.** Funds have allowed the Town to develop a prioritized inventory of brownfield properties, a brownfield steering committee – comprised of staff, stakeholders, residents, and civic leaders – establish needs, prioritize sites, and communicate progress. Funds allow us to identify and quantify the contaminants that exist within these brownfield sites so that they can eventually be remediated and redeveloped with additional leveraged funding. Outputs to date include: site inventory of over eleven priority Brownfields sites in the Target Areas, 4 Phase I Environmental Site Assessments (ESAs), 1 HBM Assessment, 1 Phase II ESA (commencing fall 2021), 1 ABCA, 2 QAPPs, Cleanup and Reuse Planning Activities for the Witt School, 2 public meetings, digital and outreach materials, Brownfield Advisory Committee meetings, and a series of public outreach surveys. Stafford attended the 2019 National Brownfields Conference. The project is currently on schedule and there have been no compliance issues with the terms and conditions of the grant agreement. ACRES and MBE/WBE reporting is up to date.

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

Response to Threshold Criteria for Cleanup Grant
Section III.B.

1. **Applicant Eligibility**
   The Town of Stafford is an eligible entity for the U.S. Environmental Protection Agency's Brownfields Cleanup Grants as a "General Purpose Unit of Local Government" under 2 CFR § 200.64.

2. **Previously Awarded Cleanup Grants**
   The Town of Stafford affirms that the proposed Site has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. **Expenditure of Existing Multipurpose Grant Funds**
   The Town of Stafford affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. **Site Ownership**
   The Town of Stafford is the sole owner of the Site. Ownership is in fee simple title. The building was decommissioned and abandoned by the Board of Education in 2007 and ownership was transferred to the Town of Stafford on November 26, 2007. The Town of Stafford will retain ownership of 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: *[former]* Earl M. Witt Intermediate School
   b. Site Address: 20 Hyde Park Road, Stafford, CT 06076; Map Lot: 70/82
   c. Current Owner: Town of Stafford

6. **Status and History of Contamination**

   a. Contamination Type: Hazardous Substances

   b. Operational History and Current Use(s):
   The Site consist of two adjoining parcels of land. The Site was historically known as Hyde Park and was privately owned. The approximate 9-acre, 20 Hyde Park Road property is currently improved with a vacant, two-story approximate 20,200 square-foot, brick, slab-on-grade school building. The building was constructed in 1939 and was used as the Stafford High School until 1968 when another high school was built in Town, therefore this school was converted into the Stafford Middle School. In 1985 the school was renamed the Earl Witt Intermediate School which remained operational until circa 2008. The remainder of this parcel also contains tennis courts and ballfields. The Town currently uses this land for Town functions such as concerts and festivals including the construction of amphitheater sometime after 2012. The 148-acre, 21 Hyde Park Road property consist of a 4,700 square foot building constructed in 1900, a small pond known as the "Hyde Park Duck Pond" with an

adjacent asphalt paved parking lot and undeveloped woodlands. The building was historically a residence which was converted to the Stafford Family Services department (date unknown).

c. Environmental Concerns:
Several Hazardous Building Material (HBM) assessments have been performed at the Site. In 1991 and 2010, Asbestos Containing Materials (ACMs) were found in interior rooms including classrooms, offices, stairwells, cafeteria, bathrooms, and other areas. ACM was also found in the pipe insulation and pipe fittings, and on the exterior, in window glazing, the gym roof and the 1953 roof. Lead paint was also identified on brick walls, window frames, and on doors in the building. In December 2020, a limited HBM investigation included sampling for Polychlorinated Biphenyls (PCBs) in caulk, and to evaluate if PCBs were present in air within the building. PCB-containing ballasts and PCB-containing building materials were identified and will have to be removed due to the CT Department of Energy and Environmental Protection (CT DEEP) requirements. Air sampling also identified concentrations of PCBs exceeding the residential screening level for indoor air that will need to be addressed to reduce the risk posed to potential future building users. The suspect source of PCBs in air is the significant amounts of damaged / peeling paint. The overall structure of the building appears to be stable, but there is some water damage

d. How the Site Became Contaminated; nature and extent of contamination:
The identified contaminates are consequent of original/historical building and construction materials. There has been no release of HBM to the outside environment. Nature and extent of contamination:

- Asbestos Containing Materials (AMCs) are present throughout the building's interior and contain greater than 1% asbestos. A total of 17 asbestos-containing materials were identified throughout the building's interior.
- The lead paint screening identified hazardous concentrations in numerous lead-based paint (LBP) paints or coatings. LBPs are present in plaster walls, risers, stringers, baseboards, railing caps, newel posts, handrails, brick walls, wall molding, doors, door casings, door jambs, metal and wood window sashes, and trims.
- The indoor air results indicate that sources of Polychlorinated Biphenyls (PCBs) in the building exist and will need to be addressed to reduce the risk posed to potential future building users.
- The water has damaged known ACM within the building. Specifically, approximately 300 square feet of floor tile in the ground floor hallway and plaster in several rooms on upper floors.
- Graffiti, vandalism, and other signs of trespassing and criminal activity are present.
- Inventory of potentially hazardous mechanical equipment is located within the survey area including, fluorescent light bulbs and fluorescent light ballasts.

7. Brownfields Site Definition

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

a. Not listed (or proposed for listing) on the National Priorities List (NPL).
b. Is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrease issued to or entered into by parties under CERCLA
c. Is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Description of Environmental Assessment Conducted

Hazardous Building Materials (HBM) surveys of the Site structure were performed by Brooks Safe and Sound in 1991 and Fuss & O'Neill EnviroScience, LLC (EnviroScience) in 2010.

A Hazardous Building Material (HBM) Assessment Report was performed by Weston & Sampson, Inc. and completed on April 28, 2021. The SSQAPP for the Witt School was approved on December 9, 2021, and the Hazardous Building Materials (HBM) survey was completed on December 22, 2021. In addition, a Site reconnaissance was conducted at the Witt School property on August 12, 2020. Abatement cost estimates associated with redevelopment were provided in the HBMI letter report completed on April 28, 2021. All items were forwarded to EPA for review and comment. The project was funded through a Cooperative Agreement between the Town of Stafford and the United States Environmental Protection Agency (US EPA) through a Brownfields Community Wide Assessment Grant; Brownfields Grant# BF-00A00360-0.

9. Enforcement or Other Actions

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

10. Sites Requiring a Property-Specific Determination

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

11. Threshold Criteria Related to CERCLA/Petroleum Liability

a. **<u>Property Ownership Eligibility – Hazardous Substance Sites</u>**

i. Exemptions to CERCLA Liability
   1) Indian Tribes – n/a
   2) Alaska Native Village Corporations and Alaska Native Regional Corporations – n/a
   3) **Property Acquired Under Certain Circumstances by Units of State and Local Government**

a. Describe in detail the circumstances under which the property was acquired.
The Town of Stafford acquired the Site via abandonment. The building was decommissioned and abandoned by the Board of Education in 2007 and ownership was transferred to the Town of Stafford on November 26, 2007. The Meeting Minutes (agenda item VIII.) of the Stafford of Board of Education meeting are on file in the Town of Stafford Town Clerk's Office.

The Board of Education operates under its own governing board and budget, and is not an agent of the Town, per 25 CS 305, Connecticut General Statutes Title 10, Chapter 170.

b. Provide the date on which the property was acquired.
The Town of Stafford acquired the property on November 26, 2007.

c. Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.
Records obtained at the CTDEEP public file revealed the former use of underground storage tanks (USTs). A 1986 UST notification form reported the use of two 6,000-gallon USTs installed in June 1938 that stored No.4 heating oil. A subsequent UST notification form dated 1989 indicated that these two USTs were removed and replaced with a single, 10,000-gallon No.2 fuel oil UST installed in September 1989. In 2012, a petroleum leakage from a 10,000-gallon underground storage tank (UST) occurred, contaminating the soil and surface water of the nearby pond. The Town performed environmental due diligence, removing the UST and fully covered the expense of the emergency cleanup at a cost over $50,000. The LUST database references a CTDEEP emergency incident field report which summarizes findings and activities observed by the CTDEEP to contain and cleanup the spill. The Town of Stafford has not caused or contributed to any release of hazardous substances at the site.

d. Affirm that you have not caused or contributed to any release of hazardous substances at the site.
The Town of Stafford affirms it has not caused or contribute to any release of hazardous substances at the Site.

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

12. Cleanup and Oversight Structure

a. Cleanup Oversight

The Town of Stafford will hire a Qualified Environmental Professional) QEP / CTDEP-approved Licensed Environmental Professional (LEP) to generate required cleanup plans and oversee remedial actions. Bid Requests and RFPs will be published in local newspapers in compliance with local, state, and federal laws, and competitive procurement provisions of 2 CFR §§ 200.317 through 200.327. The Town has policies and procedures in place for the competitive and equitable procurement of any additional scientific, engineering, legal or construction support that may be needed. Additionally, the Town of Stafford with consult with EPA to ensure the cleanup is protective of human health and the environment.

Abatement of contaminated building materials will be conducted by a competitively procured, appropriately licensed remedial contractor pursuant to CT Remediation Standard Regulations (RSRs) adopted by the Commissioner pursuant to section 22a-133k of the Regulations of Connecticut State Agencies (RCSA). Licensed, off-Site disposal of contaminated media will be conducted pursuant to the aforementioned regulations and the Connecticut Hazardous Waste Management Regulations [22a-446d]. Additional applicable local, state and federal regulatory requirements will also be adhered to. Asbestos abatement actions will require notification to and coordination with the Connecticut Department of Public Health (CT DPH) and will be conducted in accordance with CT DPH rules and regulations.

b. Cleanup Response Activities

The Site is accessible by two bordering public roads and the property is owned by the Town of Stafford; access to neighboring properties cleanup activities is not needed. Communication and outreach will be ongoing, notifying neighboring property owners and greater Stafford community to cleanup efforts and project status.

13. Community Notification

a. Draft Application

The Town of Stafford provided the community an opportunity to review and comment on the draft application and draft ABCA beginning on November 19, 2021 through November 29, 2021. If the application is selected for funding, the Town will finalize the ABCA and make it available for additional public review and comment as part of pre-cleanup activities.

b. Community Notification Ad

The Town of Stafford notified the community with its intent to apply for an EPA Brownfields Cleanup Grant through a Legal Notice, published with the Town Clerk's Office on November 15, 2021 and in the Journal Inquirer (North-Central Connecticut's daily, community newspaper) on the November 17, 2021. Concurrently, the notice was listed on the home page and meeting page of the Town's website, staffordct.org, and on the Town's Brownfields website, explorestaffordct.com/brownfields. Town Staff also direct emailed the Notice to

project partners, Town boards and commissions, and civic organizations *(November 16, 2021)*. The Public Notice was shared on the Town's official Facebook page *(November 16, 2021)*. Content of the notice clearly stated: that a copy of the grant application including the draft ABCA was available for review and public comment; how to comment on the draft application; where the draft application was located; and the date, time, and location of the public meeting. The Notice also instructed how to attend the meeting via remote participation.

c. Public Meeting
A Public Zoom Meeting was held on November 22, 2021, at 5:00 p.m. as a Special Meeting of the Stafford Brownfields Advisory Commission. The draft application and draft ABCA was presented and the Town solicited comments and questions from community members. The meeting was recorded and uploaded to the Town websites for later viewing and to garner additional feedback. The community demonstrated full support and enthusiasm for the project. From the meeting, the Town has included: the comments or a summary of the public comments received; the Town's response to those comments; meeting notes; and meeting sign-in sheet/participant list.

d. Community Notification Documents
- A copy of the draft ABCA(s)
- A copy of the newspaper ad (or equivalent) that demonstrates solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA. An equivalent method may include, for example, a dated image of the website or copy of the listserv message used to notify the public;
- The comments or a summary of the comments received;
- The applicant's response to those public comments;
- Meeting notes or summary from the public meeting(s); and
- Meeting sign-in sheet/participant list.

14. Statutory Cost Share

The Town will provide a total match of $130,000 ($7,000 in in-kind staff time to administer project management, community engagement, and brownfields cleanup efforts and $123,000 in cash contributions) of municipal funds towards cleanup activities.

15. Waiver of the $500,00 Limit

The Town of Stafford seeks $650,000 in Brownfields Cleanup funds and requesting a waiver of the $500,000. Please see attachment. The estimates were developed in consultation with the *EPA Interim General Budget Development Guidance for Applicants* and Recipients of *EPA Financial Assistance guidelines*, the April 2021 HBM Assessment conducted under the Town's Community Wide Assessment Grant and input from environmental professionals, and other related experience. *Note no equipment or supply costs are requested*.

16. Named Contractors and Subrecipients

Non-applicable