7 pages

DRAFT Analysis of Brownfields Cleanup Alternatives (ABCA)
Former Earl M. Witt School
20 Hyde Park Road
Stafford, Connecticut

I. INTRODUCTION & BACKGROUND

This Draft Analysis of Brownfields Cleanup Alternatives (ABCA) has been prepared to evaluate cleanup alternatives for the former Earl M. Witt School building, located at 20 Hyde Park Road in Stafford, Connecticut. The ABCA is a condition of the Town of Stafford's United States Environmental Protection Agency (EPA) funded Site-Specific Brownfields Cleanup Grant.

As identified in the Town of Stafford's EPA Brownfields Assessment Grant application, the former school building's ultimate reuse is an essential part of the downtown's revitalization. While the former Witt School no longer serves a productive purpose as an educational facility, the building's reactivation - envisioned with new market-viable uses – will help to activate Hyde Park and generate economic benefits that extend well beyond the property itself.

1. Site Location

The Site consist of two adjoining parcels of land located at 20 Hyde Park Road and 21 Hyde Park Road in Stafford, Connecticut. The approximate 9-acre, 20 Hyde Park Road property (Parcel ID: 70-82) is currently improved with a vacant, two-story plus basement approximate 20,200 square-foot, brick, former school building. The majority of the building is slab-on-grade with portions below grade. The building was reportedly originally constructed in 1939 with additions in 1953 and 1991.

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 (Parcel ID: 67-12) consist of a separated 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.

2. Forecasted Climate Conditions

EPA requires that the ABCA consider potential impacts due to climate concerns. Specifically, this discussion addresses observed and forecasted climate change conditions for the area of the project and associated site-specific risk factors. Stafford, Connecticut is located approximately 30 miles northeast of Hartford. Stafford is located within 70 miles of the Atlantic coast and portions of the Town are located along tributaries to the Willimantic River.

The northeastern United States, including Stafford, includes warm and often humid summers and cold winters. Rainfall can be severe with summer thunderstorms common and severe weather resulting from regional nor'easter anticyclone storms and/or hurricanes. Winter conditions can also be severe with ice storms and heavy snow common. Snowfalls of 2-3 feet in one event are not uncommon. Portions of the Town of Stafford located near rivers/streams are within the 100-year flood plain; however, due to its location and elevation, the Site is currently located in a Zone B flood plain (areas between limits of 100-year flood and 500-year flood). However, the building is not in or close to the flood plain.

According to the US Global Change Research Program website (globalchange.gov/explore/northeast), as a result of climate change, the northeast region can expect increased temperatures and temperature variability and extreme precipitation events. The website states that "Heat waves, coastal flooding, and river flooding will pose a growing challenge to the region's environmental, social, and economic systems. This will increase the vulnerability of the region's residents, especially its most disadvantaged populations. Infrastructure will be increasingly compromised by climate-related hazards, including sea level rise, coastal flooding, and intense precipitation events."

3. Previous Site Use(s) and Any Previous Cleanup / Remediation

According to the Town's Assessor's Department, the property was acquired by the town in 1911 and the building was constructed in 1939; with renovations and/or additions to the structure occurring in 1953 and 1991.

Following construction, the property was used as the Stafford High School until 1968 when another high school was built in Town. This property was then converted into the Stafford Middle School. In 1985, the school was renamed the Earl Witt Intermediate School which remained operational until 2008. The property has been vacant since that time.

In June 2015, an unsecured fill pipe caused heating oil in an underground storage tank (UST) to be displaced by rainwater. The displaced heating oil impacted localized soils and the nearby pond. fire department used booms to contain the oil on the pond and an environmental contractor (ESI) was contracted to assist with spill containment and cleanup.

ESI removed oil from the pond and the remaining oil and water from the UST into a frac tank for disposal. ESI estimated up to 200-gallons of oil was removed from the pond and UST. ESI subsequently excavated to remove the UST and impacted soils on June 5, 2015. Impacted soils were staged on plastic and stored across the street on the parking lot near the duck pond until the Town could figure out means for paying for the project. According to the Connecticut Department of Energy and Environmental Protection (CTDEEP) field report, ESI also collected confirmatory soil samples from the tank grave. A copy of the formal UST closure documentation report was not available for review at CTDEEP.

II. SITE ASSESSMENT FINDINGS

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. The surveys included sampling of building materials for asbestos-containing materials (ACMs), lead-based paint (LBP), and poly-chlorinated biphenyls (PCBs). Numerous ACMs and LBP building components were noted during the survey. Additionally, window caulking and glazing compounds present at the Site were sampled for PCB content. PCBs were not detected in any of the samples, however some of the reporting limits were greater than one milligram per kilogram (>1 mg/kg), which are presently considered a regulatory limit, as discussed below.

In the subsequent 10 years following the survey, changes to PCB regulations have been enacted. The CTDEEP now regulates PCBs in concentrations >1 mg/kg in building materials and, despite the not detected sample results obtained previously, the laboratory reporting limits for the samples were 1.7 mg/kg. Per CTDEEP regulation, the samples are considered >1 ppm and thereby regulated by CTDEEP and would require removal of the bulk material and possibly the surrounding substrate.

PCB's are also regulated under EPA's PCB regulations found in the Code of Federal Regulations, Chapter 40, Part 761 (40 CFR Part 761).

Weston & Sampson performed a supplemental HBM survey at the Site on behalf of the Town of Stafford Community Development Department (the Town) in December 2020. The HBM assessment and limited sampling of building materials was conducted to identify ACMs, lead paint/coatings, PCBs and other hazardous materials (OHMs) at the Site, as well as to support the property redevelopment and reuse and contribute to the economic revitalization of the surrounding area.

Based on the results of the inspection, sampling, field-screening and laboratory analyses, the majority of contamination at the Site is associated with ACM associated with the above-ground structure. The following is a summary of the HBM survey results:

- ACM has been identified in the building, including floor tiles and mastics, plaster surfaces, various types of thermal system insulation, window glazing and roofing materials/sealants.
- ACM thermal insulation has been identified in above-ground pipes in the buildings. This material appears to have impacted soil in the crawlspace of the basement. The survey did not include an evaluation of underground asbestos cement water/sewer piping, below-grade damp-proofing or underground steam lines that may be present at the Site.
- Various types and colors of suspect PCB materials (i.e., window caulk, window glazing and paint) were identified within the property and a total of 11 samples were collected for PCB analysis. Window glazing compound sampled by Weston & Sampson at the Site was found to contain concentrations above 1 ppm. CTDEEP guidance documents require the removal of PCB containing building materials at concentrations >1 mg/kg (i.e., 1 ppm). The guidance also requires the removal of building substrates in contact with the tested materials if PCB concentrations are >1 mg/kg (i.e., the window sashes and glass in contact with the glazing compound).
- Weston & Sampson collected three (3) air samples to screen indoor air for the presence of PCBs. Indoor air results indicated that sources of PCBs in the building exist and will need to be addressed prior to occupancy to reduce the risk posed to potential future building users.
- While several varied painted surfaces were determined to contain lead, the majority of painted surfaces in the building do not contain lead at levels considered to be hazardous. The Occupational Health and Safety Administration (OSHA) Lead in Construction Standard 29 CFR 1926.62 considers any detectable level of lead to be a potential for exposure if dust is generated from disturbances of surfaces coated with paint containing lead.
- Fluorescent light ballasts and bulbs, Other Hazardous Materials (OHMs) that will require special handling and disposal prior to building renovation / demolition activities were identified throughout the building. These materials do not necessarily represent a hazard but cannot be disposed of in a regular landfill.

III. PROJECT GOAL

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 *2022 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 had conducted 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 proposed 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 by reutilizing the commercial kitchen. This 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 Stafford Springs 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, it is anticipated that the upper floor would be converted into approximately 25 units of affordable / senior housing, with shared access to the gymnasium and kitchen to augment activities, such as an adult day care center or other community benefits.

Since the Site, but not the building, 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 the 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.

IV. APPLICABLE REGULATIONS AND CLEANUP STANDARDS

1. Cleanup Oversight Responsibility

The Town of Stafford, as the current property owner, will undertake responsibility to remediate contaminated building materials prior to building renovation. Abatement and monitoring of hazardous building materials will be conducted under state certified and licensed personnel.

2. Cleanup Standards

The Connecticut Department of Energy and Environmental Protection (CTDEEP) is the state authorities that regulates releases of OHMs and PCBs, while the Connecticut Department of Public Health regulates asbestos containing materials. Reportable releases require response actions under the Connecticut's Remediation Standard Regulations (RSRs); Title 22a-133k. RSR response actions are managed by a Licensed Environmental Professional (LEP), licensed by the State of Connecticut.

The Site is currently not regulated under the RSRs; however, asbestos abatement actions would require notification to and coordination with the Connecticut Department of Public Health (CT DPH). ACM abatement will be in accordance with CT DPH rules and regulations.

3. Laws and Regulations

Abatement of contaminated building materials prior to building renovation and/or demolition must be conducted pursuant to Remediation Standard Regulations (RSRs) adopted by the Commissioner pursuant to section 22a-133k of the Regulations of Connecticut State Agencies (RCSA). 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.

4. Green and Sustainable Remediation Measures for Selected Alternative

To make the selected alternative greener, or more sustainable, several techniques are planned. The most recent Best Management Practices (BMPs) issued under ASTM Standard E-2893: Standard Guide for Greener Cleanups will be used as a reference in this effort. The Town plans to require the cleanup contractor to follow an idle-reduction policy and will encourage the of use heavy equipment with advanced emissions controls operated on ultra-low sulfur diesel and/or fuel-efficient / alternative fuel vehicles and equipment. In addition, and in accordance with the EPA's Principles for Greener Cleanups, the Contractor is encouraged to clean and salvage/reuse/recycle demolition debris and building contents as much as possible.

Other potential measures that will be implemented where applicable, beneficial or feasible to improve the overall sustainability of the project include:

- Protecting and conserving water.
- Carpooling for Site visits and on-site project meetings.
- Scheduling activities efficiently so as to minimize travel to and from the Site.
- Maximizing efficiency in the transportation and disposal of impacted materials off-Site.
- Submitting documents in digital format, rather than hard copy, unless otherwise required by EPA, the Town and/or others, in an effort to save paper and resources.
- Optimizing the use of electronic and centralized communications for all project related correspondence and outreach to the local community, when feasible.

V. EVALUATION OF CLEANUP ALTERNATIVES

1. Cleanup Up Alternatives Considered

EPA requires that this ABCA includes the evaluation of three (3) remedial alternatives. To address the abatement of hazardous building materials at the Site, the following three (3) alternatives were considered, including:

- Alternative #1: No Action

- Alternative #2: Abatement and Renovation - Abatement would be performed assuming a gut rehab back to structural members to offer the most flexible redevelopment options and site conditions.

- Alternative #3: Abatement and Demolition

2. Cost Estimate of Cleanup Up Alternatives

To satisfy EPA requirements, the effectiveness, implement ability, and cost of each alternative must be considered prior to selecting a recommended cleanup alternative.

Effectiveness

- Alternative #1: "No Action" is not effective in controlling or preventing the exposure of potential receptors to contamination at the Site.

- Alternative #2: Abatement and disposal of hazardous building materials is an effective option, since the contaminant source is removed, and redevelopment may be accomplished. This alternative also offers long term sustainability and resiliency to climate change by minimizing the likelihood of contaminants mobilizing during future storm events.

- Alternative #3 Abatement, demolition and disposal of hazardous building materials is an effective option since the contaminant source is removed. This alternative also offers long term sustainability and resiliency to climate change by removing the likelihood of contaminants mobilizing during future storm events.

Implementability

- Alternative #1: "No Action" is easy to implement, as no actions will be conducted.

- Alternative #2: Abatement and disposal of hazardous building materials as part of redevelopment is a feasible remedial option, but will require additional design and planning, and is therefore moderately easy to implement.

- Alternative #3: Abatement, demolition and disposal of hazardous building materials is a feasible remedial option since removal of contaminated building materials must be accomplished prior to demolition. However, this option is moderately difficult to implement. This alternative requires coordination to maintain environmental controls (e.g., dust suppression and monitoring) during cleanup and demolition activities and greater short-term disturbance to the community (e.g., trucks transporting waste). For these reasons, this alternative is considered the most difficult to implement with the highest impact (truck traffic) to the neighborhood. Additionally, this alternative does not line up with EPAs green cleanup goals and objectives due to greatly increasing the quantity of waste and required trucking.

Cost

- Alternative #1: ***No Action***: There are no costs associated with this alternative; however the building would not be viable for redevelopment until HBM were abated.

- Alternative #2: ***Abatement and Renovation***: The approximate cost to perform asbestos abatement at the building due to the redevelopment and construction plans which require disturbance and removal of these materials is approximately $790,000.

- Alternative #3: ***Abatement and Demolition***: The estimated cost to abate and demolish the Former Witt School is approximately $1,825,000.

3. Recommended Cleanup Up Alternatives

The recommended cleanup alternative for hazardous building materials is Alternative #2: Abatement and Renovation. Alternative #1: No Action, cannot be recommended because it does not address Site risk. Alternative #3: Demolition, while effective at remediating hazardous building materials, comes at an implementation cost over twice as much as the cost of controlling the exposure risks in Alternative #2. Additionally, Alternative #3 will require many more trucks, will increase impacts to the neighborhood, and will produce additional waste that will take up more space in landfills. Alternative #2 is a more sustainable approach more in line with EPA's Clean and Green Cleanup guidelines due to reduced greenhouse emissions associated with less waste hauling and the reuse of materials and/or existing structures.

Therefore, Alternative #2: Abatement and Renovation is the most cost effective alternative capable of reducing risk while having the smallest impact on the surrounding community and the environment. For these reasons, the recommended cleanup alternative is Alternative #2: Abatement and Renovation.

COMMUNITY RELATIONS PLAN
for
20 HYDE PARK ROAD
FORMER EARL M. WITT SCHOOL
STAFFORD, CT
SITE CLEANUP PROJECT

In support of US EPA Brownfields Cleanup Grant

OVERVIEW OF COMMUNITY RELATIONS PLAN

Purpose: The purpose of this Community Relations Plan (CRP) is to describe the strategy that the Town of Stafford (the Town), will be employing to redevelop the property known as the Former Earl M. Witt School, located at 20 Hyde Park Road in Stafford, Connecticut (the Site). The Town of Stafford, as the current property owner, will remediate contaminated building materials prior to building renovation. Specifically, abatement and monitoring of hazardous building materials will be conducted utilizing state certified and licensed personnel.

This draft CRP outlines how the Town will involve the public and key stakeholders, including nearby residents, Town officials, nearby business owners, and local community-based organizations, in the decision-making process regarding the environmental cleanup at the Site. The CRP is required because the Town obtained funding from the United States Environmental Protection Agency (USEPA) through a Brownfields Cleanup Grant. This CRP is prepared to fulfill a requirement of the grant. The success of the redevelopment project will be improved by addressing stakeholder concerns through this CRP process.

As a part of Stafford's Brownfields Initiative, the Town of Stafford is anticipated to redevelop this brownfield site into a mixed-use building. The building is anticipated to have commercial uses on the bottom floors, such as a permanent farmer's/cooperative market and/or community space such as adult day care, and the upper floors are anticipated be converted into approximately 25 units of affordable housing. The cleanup of the Site and proposed redevelopment will significantly enhance the quality of life in Stafford, providing employment opportunities, much-needed housing opportunities, and bridging access to healthy food. Additionally, the project will remove human health and environmental impacts due to contamination of hazardous building materials.

SPOKESPERSON AND INFORMATION REPOSITORY

The spokesperson for this project is Ms. Amber Wakley-Whaley, Director of Grants and Community Development, who may be contacted at:

Amber Wakley-Whaley, Director of Grants and Community Development
Stafford Town Hall
1 Main Street
Stafford, CT 06076
860.851.8102
amberw@staffordct.org

The Information Repository is located at Stafford Town Hall. To conduct a review of the Information Repository, please contact Ms. Amber Wakley-Whaley, Director of the Office of Grants & Community Development at (860) 851-8102 or amberw@staffordct.org during normal business hours:
Town Hall Hours:

Monday – Wednesday: 8:00 am - 4:30 pm
Thursday: 8:00 am - 6:30 pm
Friday: Closed

SITE DESCRIPTION AND HISTORY

Site Location

The Site is in Stafford's 157-acre Hyde Park, located behind Main Street and Connecticut Route 32 and Route 190, in downtown Stafford less than half a mile from the Town Hall in a central area of prime development. The property is currently located in a flood plain, but the building itself is not in the floodplain and is located in Zone B: areas between limits of 100-year flood and 500-year flood.

The Site consist of two adjoining parcels of land located at 20 Hyde Park Road and 21 Hyde Park Road in Stafford, Connecticut. The approximate 9-acre, 20 Hyde Park Road property (Parcel ID: 70-82) is currently improved with a vacant, two-story plus basement, approximately 20,200 square-foot, brick, former school building. Much of the building is slab-on-grade with portions below grade. The building was reportedly originally constructed in 1939 with additions in 1953 and 1991.

The remainder of this parcel contains tennis courts, ballfields and open space. The 148-acre, 21 Hyde Park Road property (Parcel ID: 67-12) consists of a separate 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 and open space.

Site History

Operations and Ownership

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 Witt School was constructed, which first operated in 1939; with renovations and/or additions to the structure occurring in 1953 and 1991. The property was used as the Stafford High School until 1968 when another high school was built in Town. The Site was then converted into Stafford Middle School. In 1985, the school was renamed the Earl Witt Intermediate School which remained operational until 2008, as the building was decommissioned by the Board of Education in 2007 with the responsibility given to the Board of Selectmen. The former school building has been vacant since that time.

Over the past years, 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. However, vandalism, trespassing and criminal activity, continue to impact the vacant structure.

Site Investigations

i) Hazardous Building Materials Investigations – 1991, 2010

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. The surveys included sampling of building materials for asbestos-containing materials (ACMs), lead-based paint (LBP), and poly-chlorinated biphenyls (PCBs). Numerous ACMs and LBP building components were noted during the survey. Additionally, window caulking and glazing compounds present at the Site were sampled for PCB content. PCBs were not detected in any of the samples, however some of the reporting limits were greater than one milligram per kilogram (>1 mg/kg), which are presently

considered a regulatory limit, as discussed below.

In the subsequent 10 years following the survey, changes to PCB regulations have been enacted. The Connecticut Department of Energy and Environmental Protection (CT DEEP) now regulates PCBs in concentrations >1 mg/kg in building materials and, despite the not detected sample results obtained previously, the laboratory reporting limits for the samples were 1.7 mg/kg. Per CTDEEP regulation, the samples are considered >1 ppm and thereby regulated by CTDEEP and would require removal of the bulk material and possibly the surrounding substrate. PCBs are also regulated under EPA's PCB regulations found in the Code of Federal Regulations, Chapter 40, Part 761 (40 CFR Part 761).

ii) Underground Storage Tank (UST) Removal – 2015

In June 2015, an unsecured fill pipe caused heating oil in an underground storage tank (UST) to be displaced by rainwater. The displaced heating oil impacted localized soils and the nearby pond. The fire department used booms to contain the oil on the pond, and an environmental contractor (ESI) was contracted to assist with spill containment and cleanup. ESI removed up to 200-gallons of oil from the pond and UST, removed the UST and impacted soils, and collected confirmatory soil samples from the tank grave. There was no formal UST closure documentation on file at CT DEEP.

iii) Supplemental Hazardous Building Material Investigation – 2020

Weston & Sampson performed a supplemental HBM survey at the Site on behalf of the Town as part of their EPA funded Community Wide Brownfields Assessment Grant in December 2020. The HBM assessment and limited sampling of building materials was conducted to identify ACMs, lead paint/coatings, PCBs and other hazardous materials (OHMs) at the Site, as well as to support the property redevelopment and reuse planning efforts to contribute to the economic revitalization of the surrounding area.

Based on the results of the survey, sampling, field-screening and laboratory analyses, the majority of contamination at the Site is associated with ACM associated with the above-ground structure. The following is a summary of the HBM survey results:

- ACM has been identified in the building, including floor tiles and mastics, plaster surfaces, various types of thermal system insulation, window glazing and roofing materials/sealants.

- ACM thermal insulation has been identified in above-ground pipes in the buildings. This material appears to have impacted soil in the crawlspace of the basement. The survey did not include an evaluation of underground asbestos cement water/sewer piping, below-grade damp-proofing or underground steam lines that may be present at the Site.

- Various types and colors of suspect PCB materials (i.e., window caulk, window glazing and paint) were identified within the property and a total of 11 samples were collected for PCB analysis. Window glazing compound sampled by Weston & Sampson at the Site was found to contain concentrations above 1 ppm. CTDEEP guidance documents require the removal of PCB containing building materials at concentrations >1 mg/kg (i.e., 1 ppm). The guidance also requires the removal of building substrates in contact with the tested materials if PCB concentrations are >1 mg/kg (i.e., the window sashes and glass in contact with the glazing compound).

- Weston & Sampson collected three (3) air samples to screen indoor air for the presence of PCBs. Indoor air results indicated that sources of PCBs in the building exist and will need to

be addressed prior to occupancy to reduce the risk posed to potential future building users.

- While several varied painted surfaces were determined to contain lead, the majority of painted surfaces in the building do not contain lead at levels considered to be hazardous. The Occupational Health and Safety Administration (OSHA) Lead in Construction Standard 29 CFR 1926.62 considers any detectable level of lead to be a potential for exposure if dust is generated from disturbances of surfaces coated with paint containing lead.

- Fluorescent light ballasts and bulbs, and other OHMs, that will require special handling and disposal prior to building renovation / demolition activities were identified throughout the building. These materials do not necessarily represent a hazard but cannot be disposed of in a regular landfill.

Nature of Threat to Public Health and Environment

The main environmental concern at the Site is the presence of hazardous building materials. In 1991 and 2010, ACM was 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, PCB-containing ballasts and PCB-containing building materials were identified. They will have to be removed due to the 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 suspected 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.

The Site is not suitable for redevelopment and reuse without the removal of ACM, various PCB-containing 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 need to be conducted by an 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 need to be conducted pursuant to the aforementioned regulations and the Connecticut Hazardous Waste Management Regulations [22a-446d]. Asbestos abatement actions will require notification to and coordination with the Connecticut Department of Public Health (CT DPH) and will need to be conducted in accordance with CT DPH rules and regulations. Additional applicable local, state and federal regulatory requirements may also need to be adhered to

The cleanup will effectively remove the contaminant exposure pathways at the facility and allow 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.

The cleanup of the contamination will eliminate the threat of exposure of ACM and other building contaminants to future occupants and/or residents, construction workers and trespassers. Cleanup and abatement will also eliminate the threat to the general population in the building's currently deteriorating state. Grant funds will be used to reduce threats to human health and the environment by facilitating the abatement and removal of ACM from the Site building.

To address short term risks during cleanup activities, the Town will require the implementation of engineering controls such a perimeter construction fence to restrict access to the Site, dust control, and control of storm water runoff, if necessary.

The cleanup approach has been documented in the draft Analysis of Brownfield Cleanup Alternatives (ABCA). The EPA Brownfields Cleanup Funds will be used to reduce threats to human health and the environment by facilitating the abatement / removal of hazardous building materials.

COMMUNITY BACKGROUND

Community Profile

A traditional New England mill-town, Stafford is one of the more rural Connecticut towns that maintains its historical 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 Town's atmosphere 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 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 the cleanup grant is the center of the Town (downtown, census tract 8901003) which is less than 0.25 miles to a designated Environmental Justice (EJ) community and is a USDA designated food desert. Stafford 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. 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. 6% percent of households in Stafford do not have a vehicle and thus have reduced 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.

Sensitive populations to environmental health risks concerns in the Town are the elderly, children, women of child-bearing age, and the veteran population. Approximately 22% of the population is over

age 64. These groups live in the more densely populated Target Area of Stafford and are disproportionately impacted by blight and contamination associated with the presence of brownfields. Stafford's robbery rate is more than double that of the surrounding Tolland County, and reported mental health conditions were reported higher than the state average (15% in Stafford compared to 9% in CT). Furthermore, the Target Area had one of the highest asthma hospitalization rates and high blood pressure rates in Tolland County, as well as a lead paint indicator at the 81st percentile.

Although the Site is located is centrally located in the heart of the community, the abandoned school and the presence of several other underutilized buildings is an impediment to the economy and revitalization of the area.

Chronology of Community Involvement

The Town has successfully implemented a concentrated outreach and engagement program since 2019, which has served as the cornerstone for the FY19 Community-Wide Assessment Grant and FY22 Cleanup Grant proposal and EPA cooperative agreements. The Town is committed to this active engagement program and understands it is a vital part of the Stafford Brownfields Initiative, which was 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 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 in town.

The Brownfields Initiative website www.explorestaffordct.com was created in 2020 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, are occupied in the workforce or with children, the Town may deliver fliers to these residents, including the senior population, with information on contacting the Town Hall if they have questions or concerns. Public meetings and/or planning/visioning sessions will be held to receive input on the projected cleanup and reuse of the Site to inform plans for development; these will be broadcast remotely to accommodate social distancing for vulnerable citizens. The Town has and continues to utilize EPA Socially Distant Engagement Ideas, offers one-on-one meetings with residents and stakeholder groups, and continues to enhance and expand outreach efforts, as detailed below.

On November 19, 2019, the Stafford Brownfields Advisory Board (BAB) was established to encourage participation in identifying and assessing potentially contaminated properties within the Town of Stafford with the greatest potential for revitalization and redevelopment. An appeal for members was promoted through www.staffordct.org, www.explorestaffordct.com/brownfields, town-wide email, local print media, and online social media. Outreach efforts resulted in the procurement of diverse board members, each representing a cross-section of environmental professionals and engineers, legal and financial experts, business owners, and a local history annalist. The first BAB meeting held on March 3, 2020, involved the Town, the EPA, and the Qualified Environmental Professional (QEP), and discussed the goals and general process of the Community Wide Assessment Grant Program.

On December 15, 2020, a virtual public meeting was held in conjunction with the Town of Stafford Selectmen meeting. The purpose of the public meeting was to give an overview of the Brownfields program and its benefits, explain the purpose and duration of the grant, conceptual redevelopment scenarios for the Witt School and to provide the community an opportunity to ask questions and provide feedback and input into the site selection and proposed redevelopment options for the Witt School. Public comments were collected, and a community survey was introduced. The community survey was opened for responses from December 15 to January 15, 2021. The public was also directed to the Town social media outreach (website and Facebook pages) for project updates and a site nomination form.

On September 14, 2021, a virtual BAB meeting that was open to the public was held. The Town, EPA, and the QEP provided a review of the Community Wide Assessment Grant Program, and presented updates on site selections, work progress on active sites (including the Former Earl M. Witt School), community outreach, future activities, and provided an open discussion opportunity.

The Town of Stafford notified the community of 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, www.staffordct.org and on the Town's Brownfields website, www.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).

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. 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 at 1pm.

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 grant application and draft ABCA were 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. As part of the Town's grant application, the Town submitted 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.

Key Community Concerns

From the ongoing community involvement efforts, it was learned that residents and stakeholders were concerned about the potential demolition and/or private redevelopment of the former school building which is sentimental to many residents and stakeholders in the town.

As part of Stafford's Brownfields Initiative, the Town held an active community survey garnering more than 300 responses that provided 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 proposed conceptual reuse plan for the Site as a mixed-use facility was developed with these goals in mind, and will encourage entrepreneurship, sustainability, and significantly enhanced the quality of life in Stafford. The community has enthusiastically supported the proposed project.

CONTINUED COMMUNITY INVOLVEMENT

The Town of Stafford will continue to implement a concentrated outreach and engagement program, which has served as the cornerstone for the FY19 Community-Wide Assessment Grant and FY22 Cleanup Grant and EPA cooperative agreements since 2019. The Town is committed to this active engagement program and understands it is a vital part of the Stafford Brownfields Initiative, which was 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 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 in town.

The Brownfields Initiative website www.explorestaffordct.com was created in 2020 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. Stakeholders 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 those community members who do not have access to the internet, transportation, are occupied in the workforce or with children, the Town may deliver fliers to these residents, including the senior population, with information on contacting the Town Hall if they have questions or concerns. Public meetings and/or planning sessions will be held to receive input on the projected cleanup and reuse of the Site to inform plans for development; these will be broadcast remotely to accommodate social distancing for vulnerable citizens. The Town has and continues to utilize EPA Socially Distant Engagement Ideas, offers one-on-one meetings with residents and stakeholder groups, and continues to enhance and expand outreach efforts.

In addition, a legal notice will be placed in the local newspaper announcing the intended cleanup at the Site and to notify residents of a public meeting regarding the abatement and remediation efforts. In conformance with Brownfields Cleanup Grant requirements, the legal notice will also announce that the information repository on this project, including the HBM assessments and other environmental information is located at the Town offices and is available for viewing during normal business hours and at other times by appointment. The notice will also announce the start of a thirty-day comment period on the draft ABCA. The Town will accept comments on the ABCA during the comment period and will provide written responses which will become part of the administrative record. The information repository will be updated with the inclusion of all meeting minutes, status reports and other communications.

The draft updated ABCA for the project is expected to be made available to the public for review and comment for the thirty (30) day period, beginning September 15, 2023, and ending October 16, 2023. The Community Relations Plan and ABCA is anticipated to be presented at a public meeting on

September 26, 2023, at 6pm at:

The Stafford Community & Senior Center
3 Buckley Hwy
Stafford, CT
https://www.staffordct.org/departments/community___senior_center/index.php

The public meeting and availability of the draft ABCA for public review and comment will also be advertised online at www.explorestaffordct.com and www.StaffordCT.org, along with other project documents.

The following table provides an estimated schedule for the project.

Task	Estimated Start Date	Estimated Completion Date
Publish Public Notice on the Town's website and social media platforms (which will announce public meeting, timing of 30-day public comment period, and availability of information repository)	September 15, 2023	September 15, 2023
30-day Public Comment Period for Draft ABCA	September 15, 2023	October 16, 2023
Public Meeting #1 - Discuss ABCA	September 26, 2023	September 26, 2023
End of Public Comment Period	October 16, 2023	October 16, 2023
Respond to Comments	Fall 2023	Fall 2023
Finalization of ABCA	Fall 2023	Fall 2023
Public Meeting #2 – Pre Cleanup	Winter 2023	Winter 2023
Implementation of Remedial Alternative	Summer 2024	Fall 2024
Public Meeting #3 – Post Cleanup / Closeout	Winter 2024	Winter 2024