FY24 EPA Cleanup Grant Application

Response to Threshold Criteria

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

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

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

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

5. Basic Site Information
   a. Site Name: Former Gilbert & Bennett Wire Mill Manufacturing Company (G&B)
   b. Site Address: 20 North Main St. Redding CT, 06839 (primary address)
   c. Current Owner: Town of Redding

6. Status and History of Contamination at the Site
   a. Contamination Type: The site is contaminated with hazardous materials and petroleum products from former factory operations conducted between 1819-1989. These operations produced byproducts such as waste acids, alkalis, solvents, oils, paints, lead and zinc galvanizing wastes, skimmings/dross, and metal hydroxide sludge. The metal hydroxide sludge was placed in a surface impoundment area on an adjacent parcel downgradient of the target site at 15 North Main St., which was the subject of USEPA RCRA (Subtitle C) remedial action in 2001-2023 (EPA ID CTD001162775). 15 North Main St. is a separate property not owned by the Town and not part of this grant application.

   b. Operational History and Current Uses: G&B operated as a wire mill from 1818-1989 and produced metal fencing, insect screening, sieves, outdoor furniture, animal cages,
reinforcing mesh for concrete and a variety of other metal products. The primary operations included:

- Rod Cleaning: Until 1986, scale was removed from iron rods by rinsing them in acid baths, followed by water rinses and coating with lime, borax, or copper sulfate. After 1986, scale was removed mechanically.
- Rod Drawing: Steel rod was drawn through a series of round dies to produce coarse and fine wire. Soaps and animal fat were used to reduce friction in this process.
- Annealing: Wire was annealed to make the metal more malleable. Coarse wire was annealed in molten lead baths. Fine wire was annealed using direct flame heaters.
- Galvanizing: Prior to galvanizing, wire was run through an acid bath, a water, rinse, and a flux bath primer. The wire was then pulled through a molten zinc bath, followed by a water quench. The wire was then coated with a water-soluble oil.
- Fabrication: Fabrication included the bending, twisting, and/or welding of wire.
- Final steps in the fabrication process included painting, lacquering, or vinyl coating.

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

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

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

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

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

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

d. How the site became contaminated: site contamination occurred during the period of manufacturing operations between 1818 and 1989 directly through product manufacturing operations, limited manufactured gas operations, raw material storage, historical fill materials, groundwater infiltration, and air deposition from manufacturing processes.

e. Nature and Extent of contamination: contamination was identified throughout the site and is concentrated within the central portion of the former Wire Mill where manufacturing processes were primarily completed. Contamination identified within the three subject areas appears to be sporadic and typical of fill material and/or atmospheric deposition, although certain impacts identified were attributed to other sources including former underground storage tanks, deterioration of lead-based paint on former structures, and impacts associated with the railroad. Further evaluation of these impacts will be completed as part of the preparation of a Remedial Action Plan (RAP).

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

a. Not listed (or proposed for listing) on the National Priorities List (NPL).

b. Is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA.

c. Is not subject to the jurisdiction, custody, or control of the U.S. government.

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

Utilizing a 2021 DECD Assessment Grant obtained by the Town, Tighe & Bond conducted a Phase I Environmental Site Assessment and supplemental studies including: a data gap analysis (DGA), HBM survey, building structural evaluation, ecological evaluation, and river wall evaluation. The supplemental studies have identified 11 additional AOCs. Tighe & Bond conducted Phase II and limited Phase III investigations to address data gaps associated with the West Pond Area. In addition, Tighe & Bond developed opinions of probable costs for remediation and HBM abatement of priority areas of the site. The Town received a second DECD grant in 2023 that will
be used to complete a site-wide RAP and perform any additional sampling required to refine the remediation scope.

9. Site Characterization – see comments. State letters and LEP statement required
   a. Applicant that is a state or Tribal Environmental Authority
   b. Applicant other than a State or Tribal Environmental Authority eligible to be enrolled in a voluntary response program
   c. Applicant other than a State or Tribal Environmental Authority proposing a site that is not eligible to be enrolled in a voluntary response program (e.g., sites with HBM)

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

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

12. Threshold Criteria Related to CERCLA/Petroleum Liability
   a. Property Ownership Eligibility – Hazardous Substance Sites
      i. EXEMPTIONS TO CERCLA LIABILITY
         (1) Indian Tribes
         (2) Alaska Native Village Corporations and Alaska Native Regional Corporations
         (3) Property Acquired Under Certain Circumstances by Units of State and Local Government
         a. Describe in detail the circumstances under which the property was acquired.
            The Town of Redding acquired the property through municipal foreclosure of tax liens, which is an exemption from the definition of “transfer of establishment” in the Property Transfer Act.
         b. Provide the date on which the property was acquired.
            The Town of Redding acquired the property on February 16, 2021
            Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.
            The applicant is a municipality and has no direct or related liability for contamination of the property. Prior to taking title to the property the town entered the property into the Municipal Brownfield Liability Relief Program. The town is exempt from liability under CERCLA Section 101 (20)(D).
c. Affirm that you have not caused or contributed to any release of hazardous substances at the site.
   The Town of Redding affirms it has not caused or contributed to any release of hazardous substances at the Site.

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

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

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection

a. Information on the Property Acquisition

b. Property Ownership Eligibility – Petroleum Sites

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

Soil remediation and abatement of contaminated building materials will be conducted by a competitively procured, appropriately licensed remedial contractor pursuant to CT Remediation Standard Regulations (9RSRs) adopted by the Commissioner pursuant to section 22a-133k of the Regulations of Connecticut State Agencies (RCSA). Licensed, off-site disposal of contaminated media will be conducted pursuant to the aforementioned regulations and the Connecticut Hazardous Waste Management Regulations [22a-446d]/ Additional applicable local, state, and federal regulatory requirements will also be adhered to. Asbestos abatement actions will require notification to and coordinate with the Connecticut
Town of Redding, Connecticut

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Department of Public Health (CT DPH) and will be conducted in accordance with CT DPH rules and regulations.

a. Cleanup Oversight: Target sites will be entered into the Abandoned Brownfield Cleanup Program. The property will be remediated according to CT Remediation Standard Regulations (RSRs) of the Regulations of Connecticut State Agencies (RCSA).

b. Cleanup Response Activities: The site is accessible by two bordering public roads, and the site is owned by the Town of Redding. No adjacent property access is needed. Communications and outreach will be ongoing, notifying neighboring property owners and the greater Georgetown neighborhood to cleanup efforts and project status.

14. Community Notification

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

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

a. Draft Analysis of Brownfield Cleanup Alternatives

b. Community Notification Ad

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

d. Submission of Community Notification Documents
   • A copy of the draft ABCA,
• A copy of the newspaper ad that demonstrates solicitation for comments on the application and that notification to the public occurred at least 15 calendar days before the application was submitted to EPA,
• Summary of comments received,
• The applications response to those comments,
• Meeting notes, and
• Meeting sign-in participant list.

15. Contractors and Named Subrecipients
Not applicable