Introductions

Meeting Purpose:
Review application for Cleanup Grant
Provide opportunity to review/comment on grant scope and cleanup approach
Brief update on status since meeting last May
Recommendations by Wire Mill advisory’s 5-year plan

Grant scope & how this fits into the plan’s phased approach

Cleanup alternatives & recommendation
Current status, and accomplishments under 2021 DECD grant
Planned activities 2023 DECD grant
Future cleanup and planning activities
Current investigations found data gaps and additional AOCs at West Pond and Mill Center.

Findings in West Pond and OMS include sporadic metals and organic compounds above regulatory limits.

Sampling in West Pond found areas beyond what was proposed to cleanup in 2007. 2023 DECD grant will confirm extents of contamination in target areas.

Grant application is not addressing cleanup in the core area. Reuse plan is needed first to determine appropriate measures.
### West Pond

- Arsenic background condition in northwest corner of west pond area, south of Factory Pond.
- Lead and arsenic above RSRs in one sample along off-site railroad tracks.
- Elevated concentrations of petroleum hydrocarbons above RSRs in one sample beneath parking lot/former building where welding was completed.
- Lead above RSRs in samples collected in the vicinity of former dwellings and potentially associated with lead-based paint.
- Petroleum impact above RSRs at former location of a residential heating oil UST.
- Petroleum impact above RSRs at former location of a 10,000-gallon heating oil UST south of the former New Warehouse Building. Additional sampling of this area indicated that petroleum impact naturally attenuated to a concentration below RSRs.
- Low-level petroleum impact, SVOCs (mainly polycyclic aromatic hydrocarbons), and elevated metals above and below RSRs were noted throughout the West Pond Area are attributed to possible historical fill material and/or atmospheric deposition from historical manufacturing activities.

### OMS Area

- Antimony above RSRs between the west side of former OMS building and Factory Pond.
- Arsenic above RSRs in several samples surrounding the former OMS building.
- Low-level petroleum impact below RSRs throughout the OMS area.
- PCBs below RSRs in one sample collected beneath the concrete slab of the former OMS building.
- SVOCs below RSRs in one sample collected within the southwest portion of the OMS Area.

### Gateway Area

- Antimony, arsenic, cadmium, lead, thallium, and zinc were detected above RSRs in a few samples collected from the exterior vicinity of the machine shop.
- Petroleum impact below RSRs and SVOCs above and below RSRs were identified in a few samples collected from the exterior vicinity of the machine shop.

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**Summary of findings for the target soil remediation areas.**

**Metals and organic compounds in “hotspot” areas.**
Environmental Findings:
Building Materials

• Paints, caulks, and glazing within these buildings have been assumed to contain PCBs at concentrations ≥50 parts per million (ppm).
• Extensive asbestos-containing materials are found in each of these buildings including pipe insulation, roofing, flooring, boiler systems, and cement boards.

Summary of findings for building materials in targeted buildings.
Wire Mill Site: 5-Year Plan

• Improve Site Aesthetics
• Stabilize Buildings
• Engage in Georgetown Planning
• Implement Public Access
Phase I of 5-year plan
To be conducted over 4-years (Term of cleanup grant)

Soil Remediation in three areas:
West Pond, OMS, Gateway Area

HBM Abatement for two buildings:
Main Office
Machine Shop

Demo of former Cafeteria adjacent to Machine Shop
## Draft Analysis of Brownfield Cleanup Alternatives (ABCA): Subsurface Soil Remediation

<table>
<thead>
<tr>
<th>Cleanup Alternative</th>
<th>Effectiveness</th>
<th>Implementability</th>
<th>Cost Estimate</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Alternative #1</strong></td>
<td>Not effective in controlling or preventing exposure to soil contaminants</td>
<td>Easy to implement as no action will be conducted</td>
<td>No cost, however, the site would not be viable for redevelopment</td>
</tr>
<tr>
<td><strong>Alternative #2</strong></td>
<td>Prevents direct contact with contaminated materials. Achieves compliance with CTDEP RSR soil and groundwater standard. Requires confirmation sampling to determine the extent of contamination beyond/between hotspots.</td>
<td>Hotspot excavation and compliance groundwater monitoring, areas are easily accessible, excavated, backfilled, and transported. May experience some delays with disposal facility capacity.</td>
<td>$1,140,000</td>
</tr>
<tr>
<td><strong>Alternative #3</strong></td>
<td>Hotspot excavation plus statistical analysis and ECs with EURs – common approach for sites with fill materials.</td>
<td>Combination of hotspot removal with statistical analysis and ECs to render certain impacts inaccessible or environmentally isolated. Capping may be difficult to implement and needs to be monitored and maintained.</td>
<td>Cost depends on the redevelopment of the site which is currently unknown</td>
</tr>
<tr>
<td><strong>Alternative #4</strong></td>
<td>Full excavation prevents direct contact, increases mass removal, but does not require any capping or EUR.</td>
<td>Full excavation of fill at OMS and Gateway, and substantial excavation at West Pond. High level of excavation near Factory Pond and Norwalk River.</td>
<td>$40,000,000</td>
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</table>
# Draft Analysis of Brownfield Cleanup Alternatives (ABCA): Hazardous Building Material Abatement

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<tr>
<td><strong>Alternative #1A</strong> No Action</td>
<td>Not effective in controlling or preventing exposure to HBM contamination at the site.</td>
<td>Easy to implement as no action will be conducted</td>
<td>No cost, however the site would not be viable for redevelopment</td>
</tr>
<tr>
<td><strong>Alternative #2A</strong> Stabilization and encapsulation</td>
<td>Not feasible in the majority of the site and is specifically not allowed or not recommended for asbestos-containing materials.</td>
<td>Not feasible nor allowed in most areas. This Alternative cannot be implemented.</td>
<td>Not feasible or allowed.</td>
</tr>
<tr>
<td><strong>Alternative #3A</strong> Full abatement</td>
<td>Supports building renovations for commercial use in the Machine Shop and Main Office buildings and demolition of the Cafeteria that is scheduled for demolition as a majority of the building is not usable for reuse/rebuilding. This is an effective option since the contaminant source is removed.</td>
<td>Removal of asbestos-containing materials from interior and exterior sections of the Machine Shop and Main Office buildings by a licensed asbestos abatement contractor. Materials scheduled to be impacted that included paints, caulks, and glazing will be removed and disposed of as PCB Bulk Product Waste. Workers will perform lead safe work practices per 29 CFR 1962.62 during renovation work. Demolition of the Cafeteria will be performed under an CTDPH approved Alternative Work Practice (AWP) to allow for asbestos abatement variance. All demolition waste from the Cafeteria to be disposed of as mixed friable asbestos and PCB Bulk Product Waste.</td>
<td>$760,000</td>
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### Summary of Recommendations & Costs

<table>
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<tr>
<th>Cleanup Alternative</th>
<th>Subsurface Soil Recommendation</th>
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<tr>
<td>Alternative #2 (Recommended)</td>
<td>Hotspot Excavation GW Compliance Monitoring</td>
<td>West Pond Area: $ 450,000&lt;br&gt;OMS Area: $ 560,000&lt;br&gt;Gateway Area: $ 130,000&lt;br&gt;Total: $1,140,000</td>
</tr>
<tr>
<td>Alternative #1</td>
<td>No Action</td>
<td>Cannot be recommended because No Action is not protective of human health and the environment and does not provide for beneficial redevelopment of the site.</td>
</tr>
<tr>
<td>Alternative #4</td>
<td>Full Excavation of fill up to 8’ GW Compliance monitoring</td>
<td>Not recommended because soil excavation to this degree would prove to be technically complex and require significant planning efforts and funding. As such, this alternative would be cost-prohibitive, nor would it be a practicable or prudent solution for this site.</td>
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<th>Cleanup Alternative</th>
<th>Hazardous Building Material Abatement Recommendation</th>
<th>Cost Estimate</th>
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<tr>
<td>Alternative #3A</td>
<td>Full abatement</td>
<td>Main Office Abatement: $114,000&lt;br&gt;Machine Shop Abatement: $480,000&lt;br&gt;Cafeteria Abatement/Demolition: $166,000&lt;br&gt;Total: $760,000</td>
</tr>
<tr>
<td>Alternative #1A</td>
<td>No Action</td>
<td>Cannot be recommended because No Action is not protective of human health and does not provide beneficial redevelopment of the site.</td>
</tr>
<tr>
<td>Alternative #2A</td>
<td>Stabilization and encapsulation</td>
<td>Cannot be recommended because it is generally not allowed or recommended given the condition of HBM observed at the site.</td>
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Recommended soil and HBM abatement measures and costs

Total cost: $1,900,000
Additional costs to be added include:
Administration of grant
Health monitoring

Total request: $2,000,000
Copies of the draft ABCA, Cleanup Grant Application and related documents are available for review on the Town’s website: (https://townofreddingct.org/about-redding/boards-commissions/board-of-selectmen/gilbert-bennett-wire-mill/) and at the Town Clerk’s office at Town Hall.

To submit comments, contact: Julia Pemberton at jepemberton@townofreddingct.org or call (203) 938-2002.

All comments must be submitted by Thursday, November 2, 2023 at 5:00 p.m.