

COMMUNITY RELATIONS PLAN

U. S. EPA Brownfields Connecticut Department of Energy and Environmental Protection (CTDEEP)
Abandoned Brownfields Cleanup (ABC) Program | 281 Canal Street, Shelton | Remediation RFA #22401

June 6th, 2024

1.0 Overview

The purpose of the Community Relations Plan (CRP) is to describe the 281 Canal Shelton, LLC. strategy to address the needs and concerns of the City of Shelton residents potentially affected by the proposed cleanup of environmental contamination present at 281 Canal Street, Shelton, Connecticut. The CRP outlines how the Naugatuck Valley Council of Governments (NVCOG), on behalf of the 281 Canal Shelton LLC, has involved and will continue to involve, affected residents, City officials and local organizations in the decision-making process regarding the environmental cleanup at the site. This CRP is funded by the NVCOG via EPA Brownfields Revolving Loan Fund Award #BF00A00823.

Active residents involved in neighborhood issues are essential resources for the success of this project due to residents having a comprehensive understanding of the Canal Street area. The success of the environmental cleanup and subsequent redevelopment of the 281 Canal Street site hinges on informed citizen involvement in each step of the cleanup process. The proposed reuse of the site is residential space. The success of the remediation activities and redevelopment is based on a process that is open and transparent to all affected citizens.

2.0 Spokesperson and Information Repository

The spokesperson for this project is:

Ricardo Rodriguez, Brownfield Program Director
Naugatuck Valley Council of Governments.
49 Leavenworth Street, 3rd Floor
Waterbury, CT 06702
(203) 757-0535; rrodriguez@nvcogct.gov

The Information Repository is located at the Shelton City Hall at 54 Hill Street, Shelton, CT 06484 and is available for public viewing Mondays through Fridays, 8:00 am - 4:00 pm. All public meetings will be held at the Shelton City Hall unless otherwise noted. Digital copies of the repository can be viewed at <http://nvcogct.gov/event/281canalmeeting/>.

3.0 Site Description

A full description of the site and the history of use are contained in the Phase I Environmental Site Assessment. A Phase I site assessment is a report that details the past uses of a site. It contains maps from different periods that indicate when and where buildings may have been constructed. It also helps to define areas where hazardous substances may have been used and where current conditions raise concerns. The data was used as a basis for the sampling of soil and groundwater for contamination that was done under the Phase II study. These studies, and other pertinent documents, are available for public review at the Information Repository.

3.1 Site Location:

The Site is comprised of two (2) adjoining parcels of land located on the east side of Canal Street, at the northern terminus of Canal Street and approximately 1,600 feet north of the intersection of Canal Street and Bridge Street, at 281 Canal Street in Shelton, Connecticut. The southern parcel, known as 281 Canal Street, consists of 1.10 acres of land and the City of Shelton Assessor's Office further defines the Site as Lot 4 on Map 139. The northern parcel, known as 0 Canal Street, consists of 0.77 acres of land and is further defined as Lot 3 on Map 139. The current owner of both parcels is listed as 281 Canal St., LLC, as referenced in Volume 2377, Page 308 of the Shelton Land Records. The Site is located within the Planned Development District / Shelton Riverfront Development (PDD-60) Zone. The Site is developed with an industrial building that has a footprint of 82,321 square feet that extends across both parcels. The building is a composite of several interconnected buildings.

The Shelton Assessor's property cards indicate the building on the Site was constructed in 1905, although Sanborn Fire Insurance Maps (discussed in Section 6.4 of the Phase I report) indicate the building to have been originally constructed prior to 1886. The building, which is of brick construction, is divided into several different rooms and tenant spaces. The southern portion of the building is used primarily for vehicle storage with a shop area used for auto repair and auto body repair and painting in the northern portion. Much of the building is vacant. The building is mostly two (2) stories, with a third story at the northern end. Neighboring properties to the south and west of the Site are included in the PDD-60 Zone. Land to the north is in the Residence (R-1) Zone. Canal Street extends along the west side of the Site, with a strip of vacant land and railroad tracks to the west of Canal Street. A former lock associated with the Shelton Canal is located to the north of the Site. A gravel roadway is present to the north of the Site and extends to a hydroelectric dam. The Shelton Canal is located along the west side of the gravel road.

3.2 History of Site Use and Ownership:

The Shelton Assessor's Office lists the owner of the Site as 281 Canal St., LLC. 281 Canal St., LLC took ownership of the Site on May 21, 2004, from Hasler, Inc.

The Site has been used for industrial purposes since the mid-to-late 1800s. The Site originally contained a paper mill and later contained a crucible manufacturing business and a wire manufacturing business through the 1960s. The Site was later used for the manufacturing and servicing of mailing machines. The Site was most recently used for vehicle storage, automotive repairs, storage, and office space. Please refer to Section 6.1 and 6.2 in the Phase I Environmental Site Assessment report for additional information.



3.3 Nature of the Threat to Public Health and Environment:

Prior investigation of the site indicates multiple concerns that pose a threat to public health and the environment, which include the following:

Phase I Environmental Site Assessments were conducted on the Site in March 2021 by AECOM and in October 2022 by Berkshire Environmental Services & Technology, LLC (Berkshire). The Phase I reports resulted in the identification of seventeen (17) areas of concern (AOCs) on the Site.

The AOCs are defined as follows:

1. Former hazardous waste storage area along the northern side of the Site in a garage building.
2. Cleaning room that was used to clean ink from postage meters.
3. Former exterior transformers located on utility poles along the side of the building.
4. Loading docks and overhead doors located along the east and west sides of the building, further identified as AOC #4a, 4b, 4c, 4d, and 4e.
5. Former 10,000-gallon and 20,000-gallon fuel oil underground storage tanks (USTs) that were formerly located on the southeastern portion of the Site parking lot.
6. Abandoned 9,000-gallon fuel oil UST and two (2) former 5,000-gallon fuel oil ASTs located inside the building, further identified as AOC #6a and 6b.
7. Former gasoline and acid tanks that were historically located on the eastern portion of the Site.

8. Historic Site activities including former occupation of the Site by Driscoll Wire, Naugatuck Crucible, and Hydraulic Repair.
9. Urban fill, as designated on published surficial geologic mapping for the Site area.
10. Shallow release area at the southeast portion of the Site and former acid house location.
11. Release on the eastern side of the Site.
12. Non-aqueous phase petroleum on the Site's northeastern corner.
13. 8,000-gallon fuel oil AST overflow. A spill of 300 gallons of #4 fuel oil due to an overflow was reported on September 27, 2005.
14. Site-wide vehicle storage.
15. Former engine room and machine shops, further identified as AOC #15a, 15b, and 15c.
16. Former oil house.
17. Raceway from the building to the Housatonic River

Subsurface investigations have documented the presence of soils impacted with extractable total petroleum hydrocarbons (ETPH), polynuclear aromatic hydrocarbons (PAHs), metals, and/or polychlorinated biphenyls (PCBs) in sixteen (16) of the seventeen (17) AOCs. Exceedances of criteria outlined in the Connecticut Remediation Standard Regulations (RSRs) have been documented in nine (9) of the AOCs. Based on the findings of the subsurface investigations, remedial action is required at the Site in order to achieve compliance with the requirements of the RSRs. Remedial actions at the Site are anticipated to include a combination of impacted soil excavation and disposal and rendering impacted soil inaccessible and environmentally isolated beneath the new building. Soil in areas of the Site that are not to be beneath the building will require excavation and relocation to the portion of the Site that will be beneath the building. Some impacted soil at certain areas 2 feet beneath paved parking areas or 4 feet below grade will be rendered inaccessible. An Environmental Use Restriction (EUR) will be required for the Site to define the presence of inaccessible and environmentally isolated soils.

4.0 Community Background

4.1 Community Profile:

According to the 2020 United States Census, Shelton has a total population of approximately 42,144 and a population density of 1,336 people per square mile. As of 2020, 71% of residents identified as non-white versus 64% statewide, with 9% identifying as Asian, 4% as Black or African American, 12% as Hispanic, and 4% as a different race or ethnicity. Shelton's population skews older on average, with 28% of the population over 60, compared to the state average of 24%.

The project area, Census Tract 09001110100, within the City of Shelton, Fairfield County, Connecticut, has 5,922 households with a median household income of \$76,389, which is substantially lower than the city average of \$112,366. As of 2019, more than 80 percent of Shelton's 16,185 dwelling units were owner-occupied. Of the project area's 5,992 dwelling units, only 51% are owner-occupied, which is also lower than the statewide average of 78%.

4.2 Chronology of Community Engagement:

In a memo from 2023, the City of Shelton supported the developer's application for a loan request through the Naugatuck Valley Council of Governments' EPA Revolving Loan Fund Grant. The City of Shelton belongs to the Naugatuck Valley Council of Governments' Regional

Brownfields Partnership. The developer's application was followed by its submission to EPA for review and approval. The developer's application was subsequently approved by the NVCOG Revolving Loan Fund Committee in 2023.

4.3 Key Community Concerns:

To date, there have been no direct comments to the NVCOG from the public concerning the proposed cleanup. However, NVCOG staff and the Licensed Environmental Professional have been in contact with the Connecticut Department of Energy and Environmental Protection about the cleanup.

The NVCOG will continue to seek public comment and will seek to address any concerns in a timely manner. An Analysis of Brownfields Cleanup Alternatives/Remedial Action Plan (ABCA/RAP) is being prepared by the Licensed Environmental Professional. It will be presented, along with the Community Relations Plan, at a public meeting. Flyers for the public meeting will be available to area residents and businesses. A news release will be issued when the cleanup has begun. The City's Office of Economic Development and the NVCOG Board of Directors will be notified of the progress. The materials in the Information Repository will be updated periodically. The public meeting to discuss the cleanup will be held at Shelton City Hall. Notification of the meeting will be by legal notice and press release. NVCOG will respond to any feedback or comments from the public as part of its continued community engagement process.

4.4 Benefit to Targeted Community:

The greatest benefit to this project is the remediation, redevelopment, and productive reuse of a blighted and abandoned industrial site that has been vacant since the 1990s. In addition, the community will no longer be exposed to the risk of on-site contact with the contaminants associated with prior manufacturing activities. The investment by EPA and collaboration with the developer is making it possible to clean up the site. The area residents will see a reduction of health risks as a result of remediation efforts. Another Brownfield site will have been returned to productive reuse. The long-standing commitment by the City of Shelton and the NVCOG to reuse brownfields will result in the complete turnaround of the site yielding a mixed-use residential apartment building with approximately 130 units with energy efficient features. Construction will also add the Shelton Riverwalk trail through the site. An estimated 10-30 temporary construction jobs are anticipated.

5.0 Continued Community Involvement:

NVCOG staff will schedule a public meeting at the City Hall to coincide with the 30-day public comment period on the ABCA/RAP/CRP, which is being prepared by the Brownfield Program Director at the Naugatuck Valley Council of Governments and is to be approved by EPA. Among the items on the agenda for this public meeting will be the findings of the ABCA/RAP, the proposed cleanup plan, EPA's Green Remediation Policy, and the redevelopment plan for the site.

Notice of the meetings will be posted at City Hall, 54 Hill Street, Shelton, Connecticut where the meetings will be held and on the NVCOG website <http://nvcogct.gov/event/281canalmeeting/> and in a newspaper legal notice in the Shelton Herald. There will be updates, as needed, on the progress of the cleanup, and area residents will have full access to NVCOG's website where updates will also be posted. A news release will be issued when the cleanup is complete. Public comments will be solicited and responded to on an ongoing basis as needed.

6.0 Proposed Project

The project consists of abatement activities and cleanup planning at 0/280/283 Canal Street East, Shelton. Environmental activities will result in the minimization of human health and environmental risks, providing a positive outcome for the neighborhood. The clean-up of the site will allow redevelopment to proceed.

Project Schedule:

The proposed timeline is as follows:

- Developer secures LEP/contractor for cleanup project – January 2024
- Completion of the CRP and ABCA, RAP documents – June 2024
- Public meeting on proposed cleanup plan – June 27th, 2024
- 30-day public comment period on the CRP/ABCA/RAP – June 13th, 2024 – August 13th, 2024
- Beginning of site cleanup work, excavation of contaminated soils – August 14th, 2024
- Completion of long-term monitoring – 2025/2026