TOWN OF VERNON
Narrative Information Sheet
U.S. EPA Brownfield Cleanup Grant Application

1. **Applicant Identification**
   Town of Vernon 14 Park Place, Vernon, CT 06066

2. **Funding Requested**
   a. **Grant Type** - Single Site Cleanup
   b. **Federal Funds Requested**
      i. $650,000
      ii. N/A
      iii. The Town is requesting a waiver of the $500,000 and is making application for $650,000 in funding.

3. **Location**
   a) Vernon b) Tolland and c) Connecticut

4. **Property Information**
   Daniels’ Mill, 98 East Main Street, Vernon, Connecticut 06066

5. **Contacts**
   a. **Project Director**
      Shaun W. Gately
      (860) 870-3637
      sgately@vernon-ct.gov
      55 West Main Street
      Vernon, Connecticut 06066

   b. **Chief Executive/Highest Ranking Elected Official**
      Daniel A. Champagne, Mayor
      (860) 870-3600
      dchampagne@vernon-ct.gov
      14 Park Place
      Vernon, Connecticut 06066

6. **Population**
   The Town of Vernon has a population of 30,215 (2020 Census)
7. **Other Factors Checklist**

<table>
<thead>
<tr>
<th>Other Factors</th>
<th>Page #</th>
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<tbody>
<tr>
<td>Community Population is 10,000 or less</td>
<td>N/A</td>
</tr>
<tr>
<td>The applicant is, or will assist, a federally recognized Indian tribe or United States territory.</td>
<td>N/A</td>
</tr>
<tr>
<td>The proposed brownfield site(s) is impacted by mine-scarred land</td>
<td>N/A</td>
</tr>
<tr>
<td>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.</td>
<td># 3</td>
</tr>
<tr>
<td>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).</td>
<td>#1, #2, #3</td>
</tr>
<tr>
<td>The proposed site(s) is in a federally designated flood plain.</td>
<td>N/A</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.</td>
<td>#3</td>
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<tr>
<td>The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.</td>
<td>N/A</td>
</tr>
<tr>
<td>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.</td>
<td>N/A</td>
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</table>

8. **Letter from the State or Tribal Environmental Authority:**
   CT State Department of Energy and Environmental Protection: See attached Exhibit A.

9. **Releasing Copies of Applications**

   The Town of Vernon, Connecticut is claiming the following portions of their application for Brownfields Cleanup to be confidential, privileged, or contain sensitive information:

   **2.a.ii. Threats to sensitive populations**
   1. *Health or Welfare of Sensitive Populations*
   2. *Greater Than Normal Incidence of Disease and Adverse Health Conditions*
   3. *Promoting Environmental Justice*
November 29, 2021

Mr. Shaun Gately, Economic Development Coordinator
Town of Vernon
55 West Main St.
Vernon CT 06066

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

Dear Mr. Gately:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Town of Vernon intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2022. The Town of Vernon plans to use the grant funding for cleanup of hazardous substances and petroleum at its property at its property located at 98 East Main Street in Vernon, 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 online 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
Brownfields Coordinator
Office of Constituent Affairs & Land Management

c: Ms. Dorrie Paar, EPA (via e-mail)
1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

a. Target Area and Brownfields

  i. Background and Description of Target Area

  Located within the Town of Vernon in Connecticut, Rockville is a State and National Historic District with a rich industrial history anchored in manufacturing and textile mills. Vernon experienced a population increase in the late 1800s and early 1900s as industrial growth in Rockville drew people into the town from rural areas and overseas. After World War II, the majority of textile mills ceased operations, leaving behind the remnants of the textile industry. Currently, Rockville is a diverse area which serves as the civic, business, arts, and cultural center of the Town, and the County. The revitalization of Rockville is one the main priorities of the Town of Vernon due to the significant historic, cultural, and institutional assets that can be leveraged as part of its revitalization. According to the State’s brownfields inventory, there are five existing brownfields in Vernon and many other potentially contaminated properties, all located within close proximity to each other. These brownfields serve as a barrier to economic growth and community development, posing health threats to residents and occupying valuable space for residential and commercial use.

  Our target area within Rockville is a state-designated Environmental Justice (EJ) community, which is additionally compromised by adverse health impacts, high poverty levels, and low environmental quality; as such, it is a disadvantaged community based on the Justice40 Initiative definition. The target area is in need of increased housing and employment opportunities that will stimulate the community’s economy. The redevelopment of our target site, the former Daniel’s Mill, together with the adjacent Amerbelle and Anocoil Mills, will satisfy the community’s need for housing by creating market-rate housing, with additional space on the ground floors available for commercial use. The redevelopment of these mills will act as catalyst in transforming the area and the cleanup of the remaining brownfields, ultimately contributing to the goals of residential expansion, merchant attraction, and cultivation of Vernon’s culture. The Town’s goal is to cultivate a flourishing artistic culture, with the intention to reduce housing prices for artists and transform the local senior center into a community arts center.

  ii. Description of the Priority Brownfield Site

  Daniel’s Mill (hereinafter the “Site”) is one the most historic sites in Rockville located within an area historically occupied by textile mills. Overall, the Daniels, Amerbelle and Anocoil mill complex contains 9 buildings, two waterfalls, an exposed section of an underground brook, an enclosed footbridge over the road, a footbridge along the waterfall, a pond, a central open-air patio, and ample green space. The Site is a 1-acre parcel with an approximately 45,443 square foot, four to six-story mill building, that is currently vacant. The former industrial mill building was originally developed in 1855 and operated as a mill through the 1940s. The Hockanum River runs next to the Site and discharges into the American Mill Pond, picturing one of the most picturesque sceneries in the State, the Hockanum Falls. The Site has historically been used for textile manufacturing, specifically cotton, stockinet, and wool products, and cycling through several different companies. The Site transitioned away from textile manufacturing in 1951 and began the production of fire-retardant paints, mastic, and insecticides until 1978. Various industrial and commercial tenants occupied the Site, with the most recent being Band-room Studio Rentals, Sol Cantor Electric, Al Enterprises and Daniel’s Mill Self Storage and Charity Storage through 2014. A series of environmental investigations have been conducted at the property, with the most recent in September 2015, December 2019, and March 2021. In the 2021 Phase I Environmental Site Assessment (ESA), four Areas of Concern (AOCs) were identified, including the loading dock, seven current and former Underground Storage Tanks (USTs) on the north side of the building, and historic uses of the building including the exterior area and fill materials beneath the building’s basement. During the Phase II and III ESAs, a historical release of Volatile Organic Compounds (VOCs) and Polychlorinated Biphenyls (PCBs) was identified on Site, which resulted in exceedances of the residential remedial criteria set forth in the state Remediation Standard Regulations. Petroleum related VOCs were identified below the northwestern portion of the building’s basement related to a fuel oil UST located directly north and upgradient of the building. PCBs were detected within the fill materials east of the building. Polycyclic Aromatic Hydrocarbons (PAHs) and heavy metals (arsenic and lead) were also identified within the fill materials and may potentially extend...
east towards the former Amerbelle Textile Mill property. In addition to heavy metals and Extractable Total Hydrocarbons (ETPH), PCB impacts were also detected in sub-slab soils of which twelve samples exceeded the remedial regulations. Groundwater has also been impacted: VOCs and PAHs were detected in the Site’s groundwater east of the building. The 2015 Hazardous Building Materials study revealed presence of asbestos containing material in the window glazing in the building exterior, and extensive lead-based paint in caulk samples on the doors, wood composites and building floors, and fluorescent light tubes. In addition, PCBs are present in building materials throughout the site building. A Remedial Action Plan (RAP) was drafted in 2021, followed by a RAP targeting the PCB-impacted soil, concrete and building materials regulated under TSCA.

b. Revitalization of the Target Area
   i. Reuse Strategy and Alignment with Revitalization Plans

   Rockville’s proximity to large employment centers such as Pratt & Whitney, University of Connecticut, Hartford Healthcare, and Hartford’s financial and insurance companies make it an ideal location for young professionals and families to live in. In the 2020 market study, a strong demand for housing and good market occupancy was identified for the target mill complex. The redevelopment of downtown Rockville is a high economic priority for the Town and would fulfill the Town’s vision of a vibrant and livable downtown.

   Daniel’s Mill is the pivotal part of our visionary plan to transform a three-mill complex at the gateway to our city into a destination living, dining, and nature walk experience. The 2021 Economic and Fiscal Impact study identified the revitalization of the mill complex as a high impact project for the Town, and the region. The Town has entered into a purchase and sale agreement with a developer for the Daniel’s Mill and the adjacent Amerbelle Mill, also owned by the Town; this developer has already acquired the adjacent Anocoil Mill. The redevelopment of these mills will feature a path along and around the pond, beautiful outdoor staircases leading to the open patio framed by the ornate brick buildings, and multi-use reclaimed public space. The roadway that runs underneath the enclosed footbridge and between the mill buildings will be shut off to all vehicular traffic and opened instead to public events, restaurant seating, and other non-profit public uses. A total of 200 one- and two-bedroom rental units, and 15,000 square feet of commercial space for use as a brewery/event space are envisioned in the mill complex. The residential units will feature a magnificent view of the Town’s government district while directly overlooking two waterfalls that cascade down within feet of the Site’s outside walls. Although the Site is not currently located in a flood plain, climate change increasingly places disadvantaged populations in and around cities at ever greater risk. The redevelopment of the Site would help alleviate some of those burdens. Accommodating continued population growth and demand for smaller housing units is currently an issue as Vernon lacks vacant land to be developed for new housing and commercial use. This transformative plan was envisioned and honed by the Town of Vernon in collaboration with the local stakeholders including residents, artists, patrons, and business owners. Actively involved community stakeholders include the Vernon Local Historic Property Commission, Rockville Downtown Association, and the Tolland County Chamber of Commerce; these community members have voiced their input regularly throughout the planning process and are expected collaborators moving forward. Multiple residents issued constructive statements at our public hearings and workshops.

   b. Outcomes and Benefits of the Reuse Strategy

   The Rockville mills, including the Daniels Mill, are the visual entrance to the Town Center and provides the initial setting for the expectations of nearly every traveler on the main arterial into the Town. The Town still benefits from a prime location with access to infrastructure but economic opportunities and social welfare of local residents is declining. For investment and vibrant business to once again flourish, Rockville’s revitalization is imperative. The census tract of the target area is the most economically stressed in Tolland county, and among the most distressed within the State of Connecticut. The housing, estimated business investment, and job creation from the completion of this project is poised to turn this tide of disadvantage and disinvestment. In the recent Economic and Fiscal Impact Study, an estimated number of more than 200 jobs will be created during construction, and approximately 35 permanent jobs. Earnings are expected to exceed $23M while the Town expects a future increase in its tax base of approximately $500,000 per year. This will provide much needed relief to this socially vulnerable population, which is a disadvantaged community based on the combination of poverty and environmental issues it faces, as defined in the Justice40 Initiative.
Feasibility studies have demonstrated that market rate housing, including housing that qualifies as “workforce housing,” which would be affordable to the entry-level public servants of Vernon and surrounding towns, are appropriate for the Site. Economic studies determined that the Town of Vernon currently lacks housing options for workers within this income bracket, which includes teachers, police officers, fire-fighters, and EMTs. One avenue of making this plan feasible is the planned use of renewable energy sources and efficient practices. With the project becoming a mixed use residential and commercial site, renewable energy generation becomes feasible as well. The unique aesthetic 80-foot drop waterfall feature at the mill complex presents a unique opportunity for Hydro Power generation. Use of solar power generation is also being explored. While these green infrastructure models certainly allow for lowered operational costs, they also present larger up-front costs to the mills’ redevelopment. Connecticut is a current leader in funding models for these efforts, including available programs from the CT Green Bank which support renewable energy and green infrastructure projects.

Daniels Mill is a short 12-minute walk from a wide, partially paved multi-use trail head that connects Downtown Rockville with a 22-mile rail-trail. The Hop-River Rail Trail is part of the extensive East Coast Greenway (a trail system that links 15 states and over 400 towns across 3,000 miles spanning from Maine to Florida). With the redevelopment of the Rockville Mill Complex, the 4.2-mile Hop River State Park Rockville Spur will attract further attention. The Mill’s green space will provide a beautiful, scenic trailhead for both visitors and residents. Lastly, the community’s small retail and restaurant spaces currently suffer from inconsistent leases and low foot traffic resulting in slow business. By providing additional residents and affordable business leases, we will bolster the local economy.

3. Strategy for Leveraging Resource

a. Resources Needed for Site Reuse

The Town’s ability to secure funding has been proven over the last decade, with numerous state grants awarded to the overall Mill project, including Daniel’s Mill. In June 2021, the Connecticut Department of Community and Economic Development (DECD) Office of Brownfield Remediation and Development (OBRD) identified the Site as a critical project to revitalizing the local region and committed $2M in funding for remediation (See State Award Letter Threshold Exhibit I), which will cover nearly 75% of the estimated cleanup costs. Leverage resources from the DECD grant are estimated at $1,890,000 (remaining funds will be used as cost-share, discussed in Section 3.c). With Town estimates of cleanup costs being approximately $3M, the requested funds would bridge the gap to complete the cleanup. In addition to this recent state grant, the site has received another $300,000 from the State of Connecticut’s Historic Brownfield Revitalization Initiative in 2015 that was used for environmental assessment at the property. Once the Site is close to cleanup, the confirmed developer of the larger complex, Vernon Mill Owner, LLC, will be able to secure investors for the combined residential/commercial complex, and apply for funding from HUD backed lenders utilizing HUD 221 D4 programs (See Acquisition Agreement Exhibit N.) The Site is also eligible for Historic Tax Credits since the current building will be maintained. Furthermore, the Site is located in a Public Investment Community, as defined by the State. This positions the municipality as eligible for certain state programs to assist in funding of projects including Urban Action Bond Assistance, which grants funding for certain physical development projects, and the Community Economic Development (CED) Program, which provides funding to small businesses. This specific funding invests in creating jobs and physically improving distressed neighborhoods. As the Site is in a distressed census block, small businesses owners will be able to apply for the CED Program once the Site is redeveloped. The requested funds from this grant is crucial to clean up the Site, and will act as a catalyst for the Site’s ability to leverage additional resources towards its redevelopment and revitalization of the area.

b. Use of Existing Infrastructure

The Site sits within downtown of Rockville and within a quarter mile of Vernon Town Hall. It is fully served by more than adequate sanitary, drinking water, electrical, and fiber internet services. As the wastewater plant in the Town was designed to handle the large flow from the old mill sites, it has the capacity to support the large development. In addition, the Site sits less than a mile away from Interstate 84 (I-84), a major highway that leads directly into Connecticut’s State Capitol, Hartford. I-84 also offers direct connections to routes into the major urban centers of Boston and New York City. The Site is within immediate walking distance to Connecticut
bus route 84, which takes riders between Rockville and Hartford, through the recently upgraded CT Transit System.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT
   a. Community Need
2.a.i. The Community’s Need for Funding

   The target area, Rockville CDP is a small, low income community of 7,660 residents that is disproportionately impacted by additional environmental burdens. With this grant, the Town will acquire the necessary funds to cleanup Daniel’s Mill which cannot be drawn from another resource given the community’s financial struggle. Within the Tolland County and the State of Connecticut, the Town of Vernon has been one of the most disadvantaged municipalities. The Town’s median household income has been consistently lower compared to the State in the last decade; the Town had a 13% lower household income than the State average in 2010-2014, a difference that has grown to almost 20% in 2015-2019 (ACS 2010-2014 & 2015-2019).\(^1\) Our target area, Rockville CDP is one of the most low income communities with 48% low income populations, ranking at the 85\(\text{th}\)ile, 87\(\text{th}\)ile, and 78\(\text{th}\)ile within the State, region, and the nation, respectively.\(^2\) High unemployment rates in the Town that have been exacerbated due to COVID-19 rising to 7.8% in 2020 from 3.6% in 2019.\(^1\) In addition to a high percentage of SNAP benefits recipients (higher than state average in 2015-2019),\(^1\) our community has experienced financial distress to the extent that is unable to support the cleanup of brownfield sites in the area.

   As a result, there are a high number of blighted properties in the area, resulting in low property values which add an additional burden to our disadvantaged community. Median home values have been consistently lower than the state median values; approximating a difference of 25% lower than the State, a trend that has continued throughout the past decade and causes a lowered taxable revenue for the town.\(^1\) As a result of the low property values, Vernon’s mill rate has increased about 30% since 2011, which brings additional obstacles to development efforts within the Town.\(^1\) Our low income, disadvantaged community does not have the resources to cope with the economic decline brownfield sites have brought in, and it will be directly benefited by the requested funds that will act as a catalyst for the revitalization of the distressed area.

2.a.ii. Threats to sensitive populations
   (1) Health or Welfare of Sensitive Populations

\(^{1}\) CT Data Collaborative [https://www.ctdata.org/]
\(^{2}\) EPA EJSCREEN [https://ejscreen.epa.gov/mapper/]; data for Census block group 09013530200
(2) Greater Than Normal Incidence of Disease and Adverse Health Conditions

3 EPA EJSCREEN https://eiscreen.epa.gov/mapper/: data for 0.25 mile-radius around the target Site
4 CT Department of Public Health (Childhood Lead Poisoning in Connecticut CY 2015 Surveillance Report)
5 CT Data Collaborative https://www.ctdata.org/
6 CT Department of Public Health (Connecticut Cancer Incidence Data, 2010-2014)
7 CT Department of Public Health (Asthma Data by Census Tract and Town, data 2010-2014); data shown for CT 5302
8 EPA EJSCREEN https://eiscreen.epa.gov/mapper/: data for Census block group 09013530200
2.b. Community Engagement

2.b.i. Project Involvement/ 2.b.ii. Project Roles

The Town of Vernon has been working collaboratively with the community on the redevelopment of the mill complex for years. Community stakeholders have been part of the discussions with Town officials and state agencies with respect to the present condition and future reuse of the Site. **Key stakeholders outlined below will take part in the decision-making process and form the Brownfields Steering Committee (BSC).**

<table>
<thead>
<tr>
<th>Name of Organization/Entity/Group</th>
<th>Point of Contact</th>
<th>Specific Involvement in the Project or Assistance Provided</th>
</tr>
</thead>
<tbody>
<tr>
<td>Rockville Downtown Association and Opportunity Works</td>
<td>Rene Lambert 30 Lafayette Square, Vernon, CT 860-966-1374</td>
<td>Non-profit, community-based organization; community liaison; participation in BSC; support redevelopment efforts; conduct community outreach</td>
</tr>
<tr>
<td>Rockville Community Alliance</td>
<td>Jim Sendrak 860-985-8558</td>
<td>Community-based organization; participation in BSC; community liaison; participation in town commissions on brownfield redevelopment; community outreach</td>
</tr>
<tr>
<td>Tolland County Chamber of Commerce</td>
<td>Candice Corcione 30 Lafayette Square, Vernon, CT 860.872.0587 <a href="mailto:tccc@tollandcountychamber.org">tccc@tollandcountychamber.org</a></td>
<td>Liaison for regional businesses; participation in BSC; support business recruitment; conduct outreach; collect input from local businesses</td>
</tr>
<tr>
<td>Vernon Volunteer’s Collaborative</td>
<td>Jon Roe 860-875-4101</td>
<td>Coalition of 14 volunteer groups; preservation of Vernon’s environment and historic properties; encouraging arts appreciation/participation; participation in BSC; provide input on redevelopment plans; collect community’s input</td>
</tr>
<tr>
<td>Vernon Community Network</td>
<td>Teri Lynn Rogers, President 860-794-9381 <a href="mailto:tslingback@comcast.net">tslingback@comcast.net</a></td>
<td>Volunteer community agency; coordinate resources for community enrichment; participation in BSC; provide input on reuse plans and employment opportunities</td>
</tr>
<tr>
<td>Vernon Mill Owner, LLC</td>
<td>John Gumpert 3924 Paces Ferry Road, Atlanta GA john@<a href="mailto:gumpert@camdenmanagement.net">gumpert@camdenmanagement.net</a></td>
<td>Developer; participation in BSC; provide consultation and leverage financial resources towards redevelopment</td>
</tr>
</tbody>
</table>

2.b.iii. Incorporating Community Input

The Town of Vernon has established a plan to conduct community outreach and solicit public input. Given the Town’s success on previous community involvement, the Office of Economic Development is developing a training session on best practices for community engagement at the municipal level that will serve as a framework for other municipalities. Our plan for community engagement for this project includes the involvement of BSC members that will coordinate project progress on the following activities:

**Stakeholder meetings.** Stakeholder meetings will be held semi-annually in the Town Hall and will be open to the public in the form of round-table discussions, public hearings and community visioning workshops. Meeting information will be posted on Town’s website and published in local newspapers through Vernon’s Communication Specialist office. All public meetings will be held at ADA accessible facilities, and translation
and interpretation services will be available. An accessible, bimodal format with in-person and online components will be utilized to accommodate COVID-19 related pandemic shutdowns.

**Informational materials.** The Town’s website will be utilized to provide information on the project, plans, technical information, and a calendar of events. Flyers will be posted in local schools, churches, and stores with public meeting information and where to submit comments. Press releases will be issued periodically to update residents on the brownfield redevelopment process. A series of surveys will also be offered to solicit public input. Information will be posted in two languages, English and Spanish. Informational materials will also be sent directly to the residents’ addresses surrounding the Site to ensure they are informed and invited to comment on the project plans.

**Incorporation of public input.** Public input will be collected during public meetings and surveys, and will be incorporated in the redevelopment plans to ensure consensus with our community. Involvement of key stakeholders including community-based organizations will be instrumental in conducting outreach for the project and soliciting public input.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

3.a. Proposed Cleanup Plan

The proposed cleanup activities to remediate the Site are outlined in Alternative #3 of the Analysis of Brownfields Cleanup Alternatives (ABCA) attachment Exhibit C. Briefly, the most recent environmental site investigations (Phase I, GZA, 2021 & Phase II, GZA, 2015) identified release areas associated with the loading dock (REC #3) where VOCs and PCBs are present in the soils. PCB-impacted soils will require remediation given the exceedance of the RSR Direct Exposure Criteria. Hazardous building materials (ACM, PCBs, lead paint) are present in the Site building including historic uses (REC #6) that resulted in elevated concentrations of VOCs, PCBs, PAHs, ETPH and metals (specifically arsenic and lead) in soils around the building. Additional testing is required in soils directly beneath the USTs (REC #4) to identify the extent of the petroleum product release. The suggested cleanup alternative for the Site includes Hazardous Building Materials (HBM) abatement and soil remediation including the removal of PCB impacted building materials and soil with targeted soil removal actions. Remedial suggestions include:

- **REC #3:** Materials containing PCB levels greater than 1 mg/kg will be excavated and disposed off-Site. An approximate area of 500-square feet extending to a depth of 3.5-feet bgs will be excavated and disposed off-Site to a Subtitle C landfill/TSCA landfill.
- **REC #6:** Materials containing PCB levels greater than 1 mg/kg within this AOC will be excavated and disposed off-Site with an approximate area of 850-square feet extending to depths ranging from 5 to 7 feet bgs. In the basement of the building, slab removal in 5 areas is required to access the underlying impacted soils. PCBs will be disposed off-Site to a Subtitle C landfill/TSCA landfill.

Targeted soil removal will remove source materials for identified groundwater impacts. Post remediation groundwater monitoring will be performed to assess effectiveness of these remedial actions for groundwater. Alternative #3 was considered the most cost-effective alternative to both mitigate risks posed to site receptors and comply with federal and state regulations and guidelines pertaining to the chemicals of concern at the Site. Additional excavation and confirmatory soil sampling will be performed as needed. The requested funds will be utilized to cover part of the remedial activities as outlined in the tasks below.

3.b. Description of Tasks/Activities and Outputs

<table>
<thead>
<tr>
<th>Task/Activity 1: Cooperative Agreement Oversight</th>
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<tbody>
<tr>
<td><strong>i. Project Implementation:</strong> EPA-funded tasks/activities: Town staff will attend workshops and conferences including regional events and the National Brownfield Conference. Non-EPA grant resources: Town staff will manage and coordinate the project, produce quarterly technical and financial project reports, regularly update ACRES database, procure a Qualified Environmental Professional/Licensed Environmental Professional (QEP/LEP), and coordinate meetings with project partners. (in-kind contribution towards cost-share).</td>
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</table>
ii. Anticipated Project Schedule: Continuously throughout the project duration, staff will attend the annual conference; provide quarterly progress reports and continuous ACRES updates; conduct QEP/LEP procurement by Feb 2023; quarterly meetings. (See Exhibit M.)

iii. Task/Activity Lead: Town Staff

iv. Outputs: Conference attendance; project management; quarterly technical and financial project reports; ACRES updates; QEP/LEP procurement; meetings minutes.

Task/Activity 2: Community Engagement

i. Project Implementation: EPA-funded tasks/activities: Preparation of informational materials for public outreach including flyers and surveys, in both English and Spanish. Non-EPA grant resources: Town staff and project partners will form the BSC, coordinate semi-annual stakeholder meetings for community outreach, produce content for public outreach, and solicit community input (in-kind contribution towards cost-share).

ii. Anticipated Project Schedule: Continuously throughout project duration; provide press releases and website updates; conduct semi-annual stakeholder meetings/1st public meeting to be held on Oct 2022, biannually thereafter; annual surveys starting Jan 2023. (See Exhibit M.)

iii. Task/Activity Lead: Town staff and project partners

iv. Outputs: Informational materials in both Spanish and English; flyers; surveys; website updates; meeting minutes; presentations; agendas and sign-in sheets.

Task/Activity 3: Cleanup Planning

i. Project Implementation: EPA-funded tasks/activities: None. Non-EPA grant resources: Remedial planning and site preparation activities include permitting to receive necessary regulatory approvals, contract documents, erosion control, and pre-remediation stake-out survey. (towards cost-share).

ii. Anticipated Project Schedule: Months 3-9. Permitting (Jan-Mar 2023); contract documents (Mar 2023), erosion control (Apr-Jun 2023), and pre-remediation stake-out survey (Apr-Jun 2023). (See Exhibit M.)

iii. Task/Activity Lead: Contractual (QEP/LEP) with coordination from Town staff.

iv. Outputs: Contract documents; permits; erosion control; pre-remedial stake-out survey.

Task/Activity 4: Cleanup Activities and Reporting

i. Project Implementation: Discussion of EPA-funded tasks/activities: As outlined in the ABCA, the cleanup activities include: a) HBM abatement in the interior of the building including painted surfaces, wood flooring, concrete, and windows; b) Excavation, transport & disposal of PCB soil & non-PCB soil; c) waste disposal; and d) PCB-contaminated basement concrete removal. Non-EPA grant resources: Grant closure reports including construction administration and oversight contract closure; post-remedial PCB sampling; and final remedial report to DEEP. (towards cost-share).

ii. Anticipated Project Schedule: Months 10-36. Cleanup activities (a, b, c, d) are anticipated to start on month 10 and take approximately 12-18 months. Grant closure reports are anticipated to take place from months 28-36. (See Exhibit M.)

iii. Task/Activity Lead: Contractual (QEP/LEP) with coordination from Town staff.

iv. Outputs: HBM Abatement in accordance with RAP and ABCA; remediation of PCB-contaminated soil; waste disposal; PCB-contaminated basement concrete removal; post-remedial sampling; closure reports.

3.c. Cost Estimates

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<thead>
<tr>
<th>Budget Categories</th>
<th>Task 1</th>
<th>Task 2</th>
<th>Task 3</th>
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8 | Page
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<td><strong>Total Project Budget</strong></td>
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<td><strong>$47,000</strong></td>
<td><strong>$709,000</strong></td>
<td><strong>$780,000</strong></td>
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### Cost Breakdown

#### Task/Activity 1: Cooperative Agreement Oversight

Task 1 activities are estimated at $15,000 for both requested and non-requested EPA funds. A total of $3,000 is budgeted for Town staff to attend workshops and National Brownfields Conference are budgeted (total $3,000: 1 person; 2 conferences @ $500 per airfare and $250/day/person for lodging and meals for 4 days). The cost share for Task 1 ($12,000) is provided by Town staff time to manage the program and organize the activities ($12,000: 200 hours of work @ $60/hour) (towards 5% admin costs). See Salary and Job description as Threshold Exhibit H.

#### Task/Activity 2: Community Engagement

Task 2 activities are estimated at $9,000 for both requested and non-requested EPA funds. A total of $1,000 is budgeted for outreach materials (flyers, fact sheets) and meeting costs ($400 for materials, $600 for 6 meetings at $100/meeting). The cost share for Task 2 ($8,000) is provided by the Town staff time to conduct engagement/outreach (total $8,000: 133 hours of work @ $60/hour) (towards 5% admin costs). See Salary and Job description as Threshold Exhibit H.

#### Task/Activity 3: Cleanup Planning

Task 3 Activities for site preparation of cleanup are at $47,000 for non-requested EPA funds (no federal funds are requested for this Task). Planning activities include Contract Docs @ $25,000; permitting @ $12,500; Dust control/air monitoring @ $5,000; pre-remake stake out survey @ $4,500. The cost share for Task 3 is estimated at $47,000 and will covered by the State DECD grant funds. See attached Award Letter as Threshold Exhibit I.

#### Task/Activity 4: Cleanup Activities and Reporting

Cleanup Activities are estimated at $709,000 for both requested and non-requested EPA funds. Federal request is estimated at $646,000 and specific activities include a) HBM abatement in the interior of the building including painted surfaces, wood flooring, concrete, and windows estimated @ $390,395; b) Excavation, transport & disposal of PCB soil & non-PCB soil @ $175,050; c) waste disposal $46,955; and d) PCB-contaminated basement concrete removal at $33,600. The cost share requirement for Task 4 is estimated at $63,000 and will be covered by an additional activity including construction administration and oversight, contract closure @ $35,000; post-remedial PCB sampling @ $12,500; and final remedial report @ $15,500 (programmatic costs). The cost share for Task 4 is estimated at $63,000 and will be covered by State DECD grant funds. See attached Award Letter as Threshold Exhibit I.

### 3.4 Measuring Environmental Results

Town staff will track and evaluate the project’s progress. The project will be performed according to the schedule as outlined in the grant proposal and workplan. We will submit quarterly reports to EPA to summarize achievements and project updates. ACRES database will be continuously updated with specific project milestones. An output tracker will be created to track project milestones including remedial activities and community outreach. If needed, corrective actions will be taken to ensure the project remains on schedule and within budget. Town staff will also evaluate the project’s performance and outcomes including the quantity of hazardous materials abated and contaminated soil removed, land and building square footage prepared for effective reuse, and number of jobs created.
4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE

a. Programmatic Capability

i. Organizational Structure

The Town of Vernon Administration, Finance and Economic Development departments will work jointly to administer the EPA Brownfield Clean up grant. Key staff include the town’s Finance Officer, Controller, Economic Development Coordinator and Project Coordinator. The Town has successfully administered numerous state grants related to the continued remediation of Daniels Mill and its adjacent parcels, and is thereby familiar with necessary strategies for timely and successful expenditure of funds, as well as technical, administrative, financial, and reporting requirements.

ii. Description of Key Staff

**Jeffrey O’Neill** - Town Treasurer and Finance Officer. Directs the functional areas of Town finance, including investment programs, procurement, property assessment, revenue collection and grant administration. In addition, he oversees the preparation and planning of budgets and serves as the staff liaison for all matters related to the annual Single Audit process.

**Frank Zitkus** – Controller, 30+ years of governmental accounting and auditing experience. He is responsible for completing the town’s annual Comprehensive Annual Financial Report (CAFR) for which the Town has received a certificate of reporting excellence for 26 consecutive years.

**Shaun Gately** - Economic Development Coordinator - 18 years of real estate and redevelopment experience including numerous brownfield sites.

iii. Acquiring Additional Resources

Per the Town of Vernon Charter, purchases of goods/services of $25,000.00 or more necessitate a sealed bid process. Contract awards are granted to the lowest responsible bidder, after all references are checked. Non-conforming bids/proposals may also be rejected. For transparency, all sealed bids/proposals are opened publicly.

b. Past Performance and Accomplishments

ii. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements/

### (1) Purpose and Accomplishments

<table>
<thead>
<tr>
<th>Awarding Agency</th>
<th>Date/Amount Awarded</th>
<th>Purpose of Project</th>
<th>Date Completed</th>
<th>Outputs/Outcomes</th>
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<tr>
<td>CT Dept of Economic and Community Development Brownfield Municipal Grant Program Round 13</td>
<td>June 2021 $2,000,000</td>
<td>Continued Remediation of the Daniels Mill 98 East Main St.</td>
<td>In Process</td>
<td>Address PCB’s Remove UST’s Structural Repair</td>
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<td>CT Dept of Economic and Community Development Urban Act Grant</td>
<td>November 2016 $500,000</td>
<td>Hockanum Mill Restoration 200 West Main St.</td>
<td>6/30/2019</td>
<td>Phase 1 ESA Buildings 2, 3 and 4</td>
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<td>CT Dept. of Economic and Community Development Remedial Action and Redevelopment Municipal Grant</td>
<td>August 2014 $4,000,000</td>
<td>Remediation and Selective Demolition of the Amerbelle Mill Complex 104 East Main St.</td>
<td>Ongoing</td>
<td>Selective Demolition Phase III RAP</td>
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### (2) Compliance with Grant Requirements

The Town has met and will meet all of the requirements of the grant funding as described above, including consistent and timely communication with the granting agency/their project managers, completing tasks according to the work plan schedules, accomplishing/reporting anticipated results and submitting all required reports in a timely manner.
FY22 EPA Cleanup Grant Application

Threshold Criteria

1. Applicant Eligibility
   The Town of Vernon, CT was incorporated in 1808 and meets the definition of a “municipality” or local government under Connecticut State Statutes, and is therefore eligible to apply for EPA funding.

2. Previously Awarded Cleanup Grants
   The Town of Vernon affirms that the target site has not received funding from a previous EPA Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds
   The Town of Vernon has not been awarded previous EPA multipurpose funds for this site, therefore there are no funds to expend.

4. Site Ownership
   The Town of Vernon is the sole owner of Daniels Mill (98 East Main St.) and took ownership on 6-22-21 through a Tax Sale and Tax Collectors Deed. The Town of Vernon will retain ownership of the site for the duration of the EPA Cleanup grant.

5. Basic Site Information
   The Daniels Mill, which is located at 98 East Main St. (Parcel ID: 40-0117-00005), Vernon, Connecticut, 06066, is owned by the Town of Vernon CT.

6. Status and History of Contamination at the Site
   a) Contamination Type: Hazardous
   b) Operational History of the Site and current uses: The site was historically occupied as a textile mill (Sam Fitch’s Knitting Mill, Carlisle Mill, S. Fitch & Sons Co. Knitting Mill, Rockville-Worsted Co., M.T. Stevens & Sons Co.) from the mid-1880s (or prior) through the 1940s. Activities in the Site building during this period included a carpentry shop, a machine shop, knitting, carding, spinning, dyeing, drying and storage. The Site building was heated with coal through the 1940s. From the 1950s to 1970s, the Site was occupied by Double B Products Co., a producer of insecticides and paints, and Albi Manufacturing Company, a producer of fire-retardant paints and mastic. Since the 1980s, the Site has been occupied by a variety of commercial entities and used as office and warehousing space.
   c) Environmental Concerns: The Site was historically operated as a textile mill, then used for the manufacture of insecticides, fire-retardant paints and mastics. GZA GeoEnvironmental, Inc. (GZA) conducted Phase II and III investigations on behalf of the Town, including soil and soil vapor sampling, in and around the Site building between 2015 and 2019 (See details below). The results of those investigations indicated that volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), polycyclic aromatic hydrocarbons (PAHs), total petroleum hydrocarbons (ETPH), and metals (specifically arsenic and lead) were detected in soil samples at the Site. PCBs, ETPH,
PAHs, arsenic and lead were detected in fill materials to the east of the Site building and/or beneath the building floor at concentrations above the applicable criteria found in the Remediation Standard Regulations. In addition, PCBs have been detected in the building materials in the Site building.

d) How the site became contaminated, and the nature and extent of the contamination:
Historical uses of the site including the manufacturing of insecticides, fire-retardant paints and mastics, have contributed to the contaminate releases. The site building was constructed in 1855 and hazardous building materials are present within the interior and exterior of the building. Contaminant releases also extend to the soil and groundwater at the site.

7. Brownfields Site Definition
Numerous environmental assessments have confirmed that this parcel meets the brownfield definition as “any real property, the expansion, redevelopment, or reuse of which may be complicated by the presence or potential presence of a hazardous substance, pollutant, or contaminant.”

Furthermore, the site is: a) not listed or proposed for listing on the National Priorities List; b) 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; and c) not subject to the jurisdiction, custody, or control of the U.S. government. (Please refer to CERCLA §§ 101(39)(B)(ii), (iii), and (vii) and the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k).)

8. Environmental Assessment Required for Cleanup Grant Applications
GZA completed a Phase II investigation in September 2015 according to ASTM 1903-11 standards. The Phase II consisted of advancing twenty (20) soil borings, installation of two (2) groundwater monitoring wells, and collecting three (3) soil vapor samples. Soil samples were analyzed for VOCs, PAHs, ETPH, Total and SPLP metals, Pesticides, Alcohols, and PCBs. Groundwater samples were analyzed for VOCs, PAHs, Pesticides, and selected metals. Soil vapor samples were analyzed for VOCs. A summary of the Phase II findings are as follows:

- **REC #1 – Parking Lot** - Two borings were completed to refusal. Trace concentrations of metals and PAHs were below the GB-PMC and Res DEC.
- **REC #2 – Two Former USTs** – Two borings were completed to refusal. No concentrations of VOCs, PAHs, or ETPH were detected.
- **REC #3 – Loading Dock** – Two borings were completed to refusal. No concentrations of pesticides, PAHs, or ETPH were detected. Concentrations of metals were detected in both borings below the GB-PMC and Res DEC. PCB concentrations (6.0 mg/kg) exceeded the Res DEC (1.0 mg/kg) and GB-PMC. Identified impacts appear to be related to a potential release from a transformer.
- **REC #4 – Current/Former USTs** – Three borings were completed to refusal. No concentrations of alcohols, PAHs, or ETPH were detected. VOC concentrations of 1,2,4 trimethylbenzene (19 mg/kg) and 1,3,5 trimethylbenzene (5.2 mg/kg) exceeded the GB-PMC.
- **REC #5 – Former Boiler and AST** – One boring was completed to refusal. No concentrations of VOCs, PAHs, and ETPH were detected.
- **REC #6** — *Historic Use of Building* — Three soil vapor samples and one background air sample was collected. VOCs concentration were below the applicable standards. Ten borings were completed to refusal. Exceedances of the Res DEC and/or GB-PMC include VOCs, PCBs, PAHs, ETPH, and total metals were observed. Detected impacts may be related to poor quality fill, or releases from past or current factory operations. PCB concentrations (6 and 11 mg/kg) exceed the Res DEC and GB-PMC. Lead concentration (1,190 mg/kg) exceeds the Res DEC. Further PCB analyses resulted in concentrations ranging from 0.8 mg/kg to 91 mg/kg. Detection of PCBs may have been a result of historic fire-retardant paint and mastic manufacturing.

- **REC #7** — *Former Exterior Solvent ASTs* — One boring was completed to 3 feet below ground surface. VOCs and PAHs were detected below the Res DEC and GB-PMC.

- **REC #8** — *Former Transformer Area* — The boring from REC 3 was in the vicinity of REC 8. The soil sample had a PCB concentration (6.0 mg/kg) that exceeded the Res-DEC and GB-PMC.

- **REC #9** — *Upgradient Brownfield Property* — Two bedrock groundwater monitoring wells were installed. Trace concentrations of VOCs were detected. Metals concentrations exceeding the SWPC included: arsenic (5 µg/L), copper (75 µg/L), and lead (78 µg/L). Concentrations reported may have resulted from releases from upgradient properties, which include former sites of the Amerbelle mill complex.

9. **Enforcement or Other Actions**
The Town of Vernon is not aware of any ongoing or anticipated environmental enforcement or other actions related to the subject site. The Town of Vernon is not aware of any inquiries or orders from federal, state, or local government entities on the subject property.

10. **Sites Requiring a Property-Specific Determination**
A property-specific determination is not required for this site.

11. **Threshold Criteria Related to CERCLA/Petroleum Liability**
The Town is not liable for contamination at the Site. The Town is a “bona fide purchaser” as it performed a robust “all appropriate inquiry” prior to acquisition of the Site. Additionally, CERCLA Section 104(k)(C) provides that municipalities are eligible for funding even if not a BFPP for properties acquired after Jan. 1, 2002, if they did not cause or contribute to the release. The Town did not cause or contribute to the release at the Site. The Town is exempt from liability pursuant to CERCLA§ 101(20)(D), because it acquired ownership of the Site through tax delinquency. The Site was in municipal tax arrears for more than a decade. The Town acquired the Site on June 21, 2021. All of the disposal of hazardous substances at the Site occurred well before the Town acquired the Site.

a. **Property Ownership Eligibility — Hazardous Substance Sites**
The Town is eligible for a Brownfields Grant because they are exempt from CERCLA liability as municipalities are eligible for funding even if not a BFPP for properties acquired after Jan. 1, 2002, if they did not cause or contribute to the release. The Town did not cause or contribute to the release at the Site. They are also eligible because they meet the requirements of a bona fide
purchaser because they completed a “all appropriate inquiry” prior to taking title to the property by having GZA perform the requisite due diligence.

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes

This exemption does not apply as the Town is not an Indian Tribe.

(2) Alaska Native Village Corporations and Alaska Native Regional Corporations

This exemption does not apply as the Town is not an Alaska Native Village Corporation.

(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

The Town is exempt from liability pursuant to CERCLA§ 101(20)(D), because it acquired ownership of the Site through tax delinquency. The Site was in municipal tax arrears for more than a decade. The Town acquired the Site on June 21, 2021. All of the disposal of hazardous substances at the Site occurred well before the Town acquired the Site. The Site was abandoned and vacant for several years before the Town acquired title via tax delinquency. The Town did not cause or contribute to any release of hazardous substances at the Site. The Town has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances at the Site. *(See attached Deed as Exhibit B)*

12. Cleanup Authority and Oversight Structure

a. Application has been made to enroll the site in the State Brownfield Remediation and Revitalization Program, which requires site-wide investigation and remediation pursuant to the State of Connecticut’s RSRs. Because of the unauthorized disposal of PCBs at the Site in the form of releases to soil and the unauthorized use of PCBs in building materials, the Site is also subject to the Toxic Substances and Control Act (TSCA) regulations found at 40 CFR Part 761. Remedial plans to clean up releases of PCBs and to remove building materials not authorized for continued use will be submitted to EPA and CT DEEP for review, comment, and approval by the EPA Region 1 PCB Coordinator. Other non-PCB site impacts will be remediated, and verification reporting will be conducted in accordance with the Connecticut Remediation Standard Regulations (CT RSRs) by a Licensed Environmental Professional (LEP). The procurement of the LEP will be conducted through a competitive bidding process according to the competitive procurement provisions of 2 CFR §§ 200.317 through 200.326. Hazardous building material abatement will require submittal of notifications to the Connecticut Department of Public Health.

b. There are no cleanup response activities which are anticipated to require offsite access.

13. Community Notification
The Town of Vernon held a public meeting to provide an overview of the Town’s intent to apply for the EPA Brownfield Cleanup grant, and to review that application and the draft Analysis of Brownfield Cleanup Alternatives (ABCA), which is provided as Exhibit C. The meeting was held on Thursday, November 18, 2021 from 6:00 pm to 7:00 pm at 14 Park Place, Vernon, CT (3rd Floor Council Chambers). During this meeting, the Town of Vernon discussed the draft application and considered response comments. A copy of the draft ABCA and draft application were also made available in the office of Economic Development located at 55 West Main Street, 2nd floor, Vernon, CT. Public comments were encouraged via email sgately@vernon-ct.gov or in writing. Notice of this public meeting was published in the Journal Inquirer (a local newspaper) on November 8, 2021. The Journal Inquirer has a multi-town circulation of 23,000 households.

a. Draft Analysis of Brownfield Cleanup Alternatives
A copy of the draft ABCA is attached separately. Site contamination, cleanup standards and applicable laws as well as cleanup alternatives and a recommended solution were presented in the public meeting that was held on November 18, 2021.

b. Community Notification Ad
Notice of the public meeting was published in the Journal Inquirer (a local newspaper) on November 8, 2021. The Journal Inquirer has a multi-town circulation of 23,000 and a copy of the public notice is attached. The add provided the date, time and location of the meeting, where drafts of the application could be viewed, and how to comment on the draft.

c. Public Meeting

The meeting was held on Thursday, November 18, 2021 from 6:00 pm to 7:00 pm at 14 Park Place, Vernon, CT (3rd Floor Council Chambers). There were eight (8) attendees at the meeting and the Town received one (1) comment via email. A summary of the comments and meeting sign in sheets are attached. See below.

d. Submission of Community Notification Documents
The applicant must attach the items listed below to the application submitted to EPA:
- a copy of the draft ABCA is submitted as Exhibit C.
- a copy of the newspaper ad is submitted as Exhibit D.
- meeting sign-in sheet/participant list is submitted as Exhibit E.
- meeting minutes/notes from the public meeting(s) is submitted as Exhibit F.
- the summary of the comments received is submitted as Exhibit G.
- the applicant’s response to those public comments is submitted as Exhibit G.

14. Statutory Cost Share
The Town of Vernon will be providing a 20% cost share on this grant. The Town is asking for $650,000 and is seeking a waiver to exceed the $500,000 limit; therefore the 20% cost share is $130,000. The cost share will be met through a combination of in-kind labor from four (4) Town of Vernon staff members performing outreach, project management, cleanup oversight and coordination in conjunction with implementation of Tasks 1 through 4, which is valued at $20,000. Estimates for staff time required for each task were based on time expended on multiple
past projects funded in part through State of CT brownfield cleanup grants (see attached salary tables as Exhibit H.) The remaining $110,000 is as follows and comes from a recent $2 million dollar grant award from the State of Connecticut Department of Economic and Community Development (See attached Award Letter as Exhibit I.), which will cover the following activities:

a) Pre-remedial planning estimated at $47,000, with breakdown: (See Exhibit L.)
   • Contract Docs at $25,000 (Selected activities under Task 1 in soil & groundwater remediation budget table)
   • Permitting at $12,500 (Selected activities under Task 1 in soil & groundwater remediation budget table)
   • Dust control/air monitoring at $5,000 (Selected activities under Task 2 in soil & groundwater remediation budget table)
   • Pre-remediation stake out at $4,500 (Selected activities under Task 2 in soil & groundwater remediation budget table)

b) Cleanup activities & programmatic costs at $63,000, (See Exhibits K. and L.)
   • Construction admin/closure reports at $35,000 (Selective activities under Task 7 in soil & groundwater remediation budget table)
   • PCB sampling at $12,500 (Selective activities under Task 13 in Building Material Remediation Budget table)
   • Final Remedial report at $15,500 (Selective activities under Task 7 in soil & groundwater remediation budget table)

15. Waiver of the $500,000 Limit
The Town of Vernon will be addressing one brownfield site with this cleanup grant and is requesting a waiver of the $500,000 limit to the maximum allowable amount of $650,000 (See attached Waiver Request as Exhibit J.). The attached budgets (See Building Material as Exhibit K., and Soil and Ground Water as Exhibit L., outline the costs of addressing the significant contamination at this Site. Without EPA funding, it will be difficult to put this property, and the adjacent Mills, back into productive reuse. The Town has entered into a purchase agreement with a developer who is prepared to redevelop the Site once the remedial work is substantially complete.

16. Named Contractors and Subrecipients
The Town has not named a procurement contractor.