

COMMUNITY RELATIONS PLAN

SHELTON BROWNFIELD CLEANUP (EPA/DEP)

for the

Rolfite Property

CITY OF SHELTON, CONNECTICUT

1. OVERVIEW

The purpose of this Community Relations Plan (CRP) is to delineate the communication strategies that will address the needs and concerns of the citizens of Shelton, particularly the residents who are directly or potentially affected by the proposed removal of environmental contamination present at the former Rolfite property located in the City of Shelton. This CRP elucidates how the City has involved and will continue to involve affected residents, City officials, and local organizations in the decision-making process regarding the environmental remediation efforts at the site. As with the dissemination of information and the coordination and facilitation of community outreach throughout the previous activities on the site, the City, acting through the Shelton Economic Development Corporation, is primarily responsible for implementing community relations pertaining to the site.

Active residents and institutions in the community are essential resources for the success of the CRP as they hold positions of responsibility within the community. The City of Shelton perceives these citizens and organizations as key points of contact and communication. One measure of success of the environmental remediation and subsequent redevelopment of the former Rolfite property hinges on informed citizen involvement in each step of the remediation process.

There will be a public comment period beginning on Wednesday July 11, 2007. Comments may be submitted at a public meeting which will be held on Wednesday July 18, 2007 at the Shelton Economic Development Corporation at 7 PM. The SEDC is located at 475 Howe Avenue, Suite 202 Shelton, Connecticut 06484. Comment may be submitted at the meeting or in writing via the US Mail or EMAIL (sedc1@snet.net). The meeting will be scheduled in accordance with Freedom of Information requirements and the meeting will be taped and a written record prepared.

2. SPOKESPERSON AND INFORMATION REPOSITORY

The spokesperson for this project is James E. Ryan, President, Shelton Economic Development Corporation, who may be contacted at:

Shelton Economic Development Corporation (SEDC)
475 Howe Avenue Suite 202
Shelton, Connecticut 06484
(203) 924-2521

The Information Repository is located at the Shelton Economic Development Corporation (SEDC) at 475 Howe Avenue, Shelton, Connecticut. The administrative record will be available from 9 AM until 4 PM, Monday through Friday at the SEDC office.

3. SITE DESCRIPTION AND HISTORY

The former Rolfite property is located at 131 East Canal Street, downtown Shelton. Operations at the site prior to 1954 are unknown but the site was likely vacant. Since around that time, the site has been used for manufacturing including fuel blending additives. The process included several above and below ground

storage tanks. All operations were reportedly terminated at the site in 1988. One asbestos-containing building was demolished and several above-ground storage tanks were removed. There are currently no on-site buildings, although foundation outlines are still evident. Likewise, former railroad tracks abut the site. The Rolfite property is currently inactive.

The EPA conducted a Targeted Brownfields Assessment in 2001 at the site (Phase I and II assessments). The TBA revealed the presence of petroleum contamination, including the presence of several underground tanks. The TBA report concluded that one action needed at the site was the removal of the fuel oil storage tanks and associated fuel blending pipe network, along with impacted soils. There have also been EPA removal actions at the site in the late 1980s and early 1990s to remove drums and containers of wastes that were left behind when the site was abandoned. In one report, the EPA noted that the site removal actions were complete in terms of the removal of hazardous substances, but not for the petroleum related issues. The City of Shelton and the Shelton Economic Development Corporation (SEDC) have worked extensively to initiate and sustain the redevelopment of the canal street area, an area located in downtown Shelton. This area, once highly used to support industrial activities, has now been designated as the prime area for redevelopment and growth within the downtown area, including development of land for community use, such as park space. The cleanup of the Rolfite property is instrumental in realizing the redevelopment plans for this area.

In the fall of 2005, the City applied for a cleanup grant from the EPA. In the spring of 2007, the City was awarded \$200,000 for the Rolfite property. The cleanup grant will be used to provide project coordination, provide community outreach services, secure an environmental engineering consultant to prepare the remedial design and specifications and oversee the remediation, and to implement the remedy.

4. NATURE OF THREAT TO PUBLIC HEALTH

The environmental concerns at the site include direct exposure contact to contaminated soils and leaching of contaminants to the groundwater below the site, and eventually into the adjacent Housatonic River (50 feet from the underground storage tanks and hydraulically down gradient). Contaminants include petroleum hydrocarbons (oil). Other compounds present that were related to the fuel oil blending are polycyclic aromatic hydrocarbons (PAHs). These petroleum-related contaminants have been identified at the site above concentrations considered by the CT DEP to indicate health risks (via contact and leaching to the groundwater and surface water).

The site cleanup will reduce threats to human health due to the petroleum hydrocarbons (particularly for children in the nearby school and trespassers) and due to the physical hazards still present due to the deteriorating tanks and associated piping. In addition, the site cleanup will improve ecological and aesthetic conditions along the riverfront by reducing concentrations of contaminants migrating to the adjacent Housatonic River and by removing the unsightly tanks and associated piping and other debris;

5. COMMUNITY PROFILE

In 1999, 3.2 percent of Shelton's population lived below the poverty line. In the same year, 7.9 percent of Connecticut's residents and 7.7 percent of the people within the NVC lived in poverty. Shelton possessed the tenth largest percentage of people in poverty within the NVC in 1999. Waterbury and Derby had the highest percentage of residents living in poverty in the NVC in 1999. Prospect and Oxford had the smallest percentage of residents living in poverty in the NVC in 1999.

* Shelton is lower than CT (4.7 pts) and NVC (4.5) for people living in poverty.
10 out of 17 for percent poverty in NVC

In total, 1,208 of Shelton's residents live in poverty. Shelton possessed the fourth highest number of residents living in poverty in the NVC in 1999. Waterbury and Naugatuck possessed the highest number of

residents living in poverty within the NVC in 1999. Bethlehem and Prospect tied for the lowest number of people living in poverty among NVC cities and towns in 1999.

* High number in poverty – 4 in NVC

* Increases in Poverty in Shelton, 1989-1999

The population living in poverty in Shelton increased by 39 percent (from 867 to 1,208) from 1989 to 1999. The number of residents living in poverty increased by 30 percent in the NVC and 19 percent in Connecticut from 1989 to 1999. Shelton experienced the ninth largest percent increase in people living in poverty within the NVC from 1989 to 1999. Beacon Falls, Southbury, and Thomaston possessed the highest percent increases in poverty population in the NVC from 1989 to 1999. During this ten-year period, five NVC towns (Bethlehem, Prospect, Watertown, Middlebury, and Seymour) experienced a decrease in the number of residents living in poverty.

* 9th highest percent increase in poverty population (39%) in NVC.

Shelton's poverty population increased by 341 residents from 1989 to 1999. Shelton experienced the fourth largest increase in the number of residents living in poverty within the NVC towns from 1989 to 1990. Within the NVC, Waterbury and Naugatuck's poverty populations grew by the largest number of people whereas Watertown and Seymour's poverty populations decreased by the largest number of residents from 1989 to 1999.

The project has been determined to have a regional impact and the benefits are far reaching. In regards to the actual target area it is located in the census tract with the highest percentage of low and moderate income individuals, houses a grammar school with the highest percentage of Title One students, and is several blocks from the site of a proposed homeless shelter. Two homeless individuals have perished at or in the vicinity of these sites.

The community prides itself on its diversity: of populations, interests and facilities.

6. Explain how the Targeted Community will benefit from this Grant

Brownfield's in our community have led to the decline and underutilization of our former Central Business District, currently known as the City of Shelton Downtown Revitalization Area. This has led to job loss and out migration and loss of tax revenue. There are approximately 70 acres of land and building that are known to or most likely have some historical contamination which affects its productive economic use or presents a threat to the public health and safety. The City of Shelton has embarked on a program of Brownfields redevelopment and this initial application is in support of the second phase of that effort.

The targeted community will benefit from this grant in five primary ways. First, the site cleanup will reduce threats to human health in the area. Second, the site cleanup will reduce risks to the environment, particularly in the ecologically sensitive waterfront area. Third, the cleanup will facilitate the site's redevelopment for new private investment and for the extension of the City of Shelton river walk a popular local and regional asset. Fourth, the cleanup will complete the conversion of the site from community blight into a community asset.

7. CHRONOLOGY OF COMMUNITY INVOLVEMENT

1. Creation of Citizens Advisory Committee in late 1980s
2. Adoption of Shelton Enterprise and Commerce Park in 1997 for public approval process and referendum
3. Phase 1 Implementation from 1997-present with monthly citizen meetings
4. Phase 2 Implementation from 2000-present with monthly citizen meetings
5. Shelton Farm and Public Market from 2000-present with monthly citizen meetings
6. Rolfite study through EPA targeted site assessment and community and state review of findings
7. Demolition of all above ground facilities with DECD grant
8. Planning for reuse of site with Citizen Participation

9. Development of grant application with Citizen Committee presentation

The community has already been involved in reuse planning, as this project has been discussed at several community meetings beginning in 2000 and multiple other occasions since then. The community is actively engaged in the support of the redevelopment of the site. The community will continue to be involved through the Citizens Advisory Committee and Community Involvement meetings. This proposal includes plans for two community meetings regarding the site cleanup and redevelopment. The City works with State DEP, State DECD, the Shelton Economic Development Corporation and the Regional Brownfields Pilot and local citizen's advisory committee which is consulted for site inventory, site selection, and reuse planning decisions. Beyond that, there have been a variety of community involvement activities including a newsletter and more recently with the inclusion of an article in the City of Shelton Annual Report for distribution to every residence and business in the community. We have worked closely with the State of Connecticut Department of Environmental Protection (CTDEP) on site assessment and cleanup issues. CT DEP actively worked with Shelton to secure funding for assessment and cleanup activities. Finally, Shelton has representation on the Regional Brownfields Pilot through Mayor Lauretti's appointment to the group. This provides strong linkage to state offerings through the Connecticut Department of Economic and Community Development (DECD).

8. Brownfields Site Identification

The City works with State DEP, State DECD, the Shelton Economic Development Corporation and the Regional Brownfields Pilot and local citizen's advisory committee all of which are periodically consulted for site inventory, site selection, and reuse planning decisions.

9. U.S. EPA Brownfields Cleanup Grant

The US EPA grant will be devoted to implementation of the approved EPA work plan leading to a permanent resolution to site remediation issues governed by the EPA and CT DEP. The City of Shelton will be providing the required match and in-kind assistance as may be necessary.

10. Brownfields Initiative Communications

The City through this cleanup grant will establish a system for communicating its brownfields project progress to the community through the distribution of project fact sheets and press releases to the local media. Periodic update meetings will be focused on providing information on environmental assessment results, cleanup activities, stakeholder negotiations (if any), and redevelopment strategies. Project consultants will present this information to prevent any inaccuracies in disseminating technical information. The City will prepare project update fact sheets that relay project status, redevelopment plans, funding strategies, and the general project timeline, through its Shelton Life publication which is delivered to every Shelton home and business and which is also available on the City of Shelton website. Finally, the City will work closely with the local newspapers to prepare articles on its brownfields initiatives at critical junctures. In order to solicit public comments on the approach to remediation, a clear understanding of the site background, the existing health and environmental risks, and need for response actions will be provided. Summaries of data and applicable State regulations will be presented for review.

11. Outreach to Sensitive Communities

The City is reaching out to those persons with the greatest exposure to the site, and focusing particularly on the sensitive communities identified: African-American minorities, minors, and low-income persons. Many of the children and families who live in the affected community participate in programming at the Boys and Girls Club. Taking advantage of these established activities, the City will present information to the Directors and Staff of the Boys and Girls Club for dissemination to the sensitive communities.

12. KEY COMMUNITY CONCERNS

The goals of Shelton's Brownfields Initiatives are:

- To create developable land within the downtown for business expansion and public uses
- To eliminate blight
- To reconnect the downtown to the riverfront and to reconnect the downtown to adjoining communities through investments in public infrastructure that will promote safe, convenient, and handicapped accessible public streets and sidewalks
- To improve the health and safety of the adjacent residential neighborhoods
- To redevelop industrial and commercial land into appropriate and viable land uses including industrial, commercial, and residential uses, as well as recreational and green space uses.
- To promote new tourism opportunities to attract visitors to the community

These issues form the basis of the recommendations in the redevelopment strategy for the site.

13. Continued Community Involvement during the Implementation Phase of the EPA Brownfields Grant

The following tasks comprise the City's Rolfite Brownfield Cleanup Grant project:

1. The city has verified its enrollment in CT DEP programs required for EPA funding.
2. Work Plan preparation and submittal to EPA and CT DEP
3. Preparation of this Community Relations Plan
4. Implementation of this Community Relations Plan including two public meetings, one in the middle of project implementation.
5. Finalize remediation plans and obtain approvals
6. Procure site remediation contractor possibly going through selected LEP
7. Conducting cleanup of the site
8. Complete grant administration
9. Preparation and submittal of Remedial Action Completion Report CT DEP and EPA
10. All other EPA and DEP required activities

The City, acting through the Shelton Economic Development Corporation intends to contract with Metcalf and Eddy for all qualified environmental professional required services including site remediation through the amendment of an existing agreement following receipt of concurrence from the City of Shelton, Board of Aldermen. Metcalf and Eddy are also CT DEP approved contractors, and the City has submitted the work plan associated to the EPA project manager for approval

14. Future Community Partnerships

Once the remediation planning process and cleanup for the Rolfite site are complete the City will continue to work with the community to develop ongoing strong partnerships for future Brownfields activities anticipated in the Shelton Enterprise and Commerce Park as needed to analyze the plans and to make recommendations and seek funding for implementation. The City considers it important to be practical, yet creative in both the plan and its implementation. Local resources are not sufficient to implement the plans without of federal and state assistance

15. Notice of Actions to the Community and Comment Period

In conformance with EPA guidelines, a legal notice will be placed in the local newspaper announcing the intended response actions at the site and to notify residents of two public meetings regarding management's efforts. The legal notice will also announce the location of the repository of information on this project, which will include this Community Relations Plan, the Draft Remedial Action Plan/Memorandum, environmental assessments, risk assessments, and other environmental. This information will also be posted on the City's

website. A notice will also announce the start of a thirty-day comment period on the draft Remedial Action Plan/Memorandum. The City of Shelton (SEDC) will accept comments on this plan during the comment period and will provide written responses that will become a part of the administrative record. The information repository will be updated with the inclusion of all meeting minutes, status reports, and other communications as they are generated. Information will be specific as it relates to meeting both State and Federal requirements.

16. Shelton Brownfields Cleanup Program/EDA/DEP/DECD

Schedule of Major Milestones

Please see the referenced attachment for a complete preliminary schedule.

**Attachment to Form 4700-4
Schedule
Rolfite Site Cleanup – Shelton, Connecticut**