



SEPTEMBER 2014

TOWN OF STRATFORD - EPA BROWNFIELD CLEANUP GRANT
COMMUNITY RELATIONS PLAN (CRP)



PREPARED BY:
Town of Stratford
Conservation Department
550 Patterson Avenue
Stratford, CT 06615

PROJECT:
Demolition and Remediation of the Former
Mercer Fuel Facility
2350 Stratford Avenue
Stratford, CT 06614

EPA BROWNFIELD ASSISTANCE AGREEMENT
No. BF-96195001

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I. OVERVIEW OF THE COMMUNITY RELATIONS PLAN

A Community Relations Plan “CRP” is a required component of the Environmental Protection Agency (EPA) Brownfield Cleanup Grant program. The purpose of the Community Relations Plan is to describe the Town of Stratford’s strategy to address any needs or concerns which the local residents may have about the proposed demolition and removal of environmental contamination present at the site known as “Mercer Coal” located at 2350 Stratford Avenue, Stratford, Connecticut. A site location map has been provided as **Appendix A**.

The community relations program is designed to address issues of public concern, inform interested citizens and officials about the progress of the site activities, and provide information about opportunities for public involvement at the Site. This CRP and the community relations activities will be an on-going effort by the Town and EPA. Changes to this CRP will be made periodically as needed. Any comments or questions on this CRP should be sent to the spokesperson indicated in the below section.

The 2350 Stratford Avenue site is one of the Town’s initiatives focusing on revitalization as well as future development along the Stratford Avenue corridor. This project will remediate and redevelop the 0.69 acre lot for the purpose of a redevelopment. The redevelopment of 2350 Stratford Avenue will provide a much needed increase in the municipal tax base while also removing a long standing blight from the neighborhood.

SPOKESPERSON AND INFORMATION REPOSITORY

The Community Relations person for this project is Mr. Brian Carey who may be contacted at (203) 385-4006, or email at brownfields@townofstratford.com Information Repository will be maintained by the Town of Stratford and will be updated with the inclusion of community meeting minutes, status reports and other communications and information required. Public meetings will be held within the Town of Stratford in Room 213 of the Town Hall at 2725 Main Street, Stratford, Connecticut.

An Information Repository is located at the following location:
Conservation Department
Town of Stratford – Department of Public Works
550 Patterson Avenue
Stratford, CT 06615

II. SITE INFORMATION

Site Location and Description

The site is currently owned by the Town of Stratford. The subject site is located at 2350 Stratford Avenue, Stratford, Fairfield County, Connecticut and encompasses 0.69 acres. The property is abutted by Metro-North railroad tracks then commercial/industrial properties to the north, Stratford Motor Inn and commercial strip mall to the east, Stratford Sandblasting and Monuments to the west, and Stratford Avenue and then Saint Michael’s Cemetery to the south.

The site is improved with one (1) residential-style structure and six (6) reinforced concrete silos. Asphalt parking areas are located along the western property boundary. The remainder of the site is covered with broken asphalt and gravel. The site is currently vacant.

2350 Stratford Avenue is located on the Stratford Avenue Corridor, a major commercial and industrial corridor that is surrounded by residential homes. Along and around this corridor and within this targeted census tract, there are approximately 1,600 total housing units and about 4,300 residents, 30% of whom are children age 19 and under. The neighborhood contains few green spaces or truly walkable areas- there is one small park and a large cemetery, but for the most part the area is predominately characterized by both vacant and operational light and medium industrial sites. The Town has identified approximately 14 other known or suspected brownfields in the area, including an adjacent site known as Wade's Garage, which is strongly suspected to be contaminated with pollutants typically found at junk yards and operational auto repair shops. The Town is currently pursuing tax foreclosure on this site as well. This corridor has been cited in the Town's Master Plan of Conservation and Development (updated in Winter 2013) as a major priority for economic and community development. While there has been some progress towards cleanup and redevelopment/reuse of two properties here, they represent a "drop in the bucket" when compared to the number of contaminated sites that remain.

Site History

From 1929-1979, the subject site operated as Mercer Fuel Company, a bulk storage coal and petroleum distribution facility. Prior to 1929, the site was undeveloped land. The site has been vacant and inoperable since 1979 and was acquired by the Town through tax foreclosure on March 18th, 2011.

The primary source of the contamination at the site were three (3) 30,000-gallon fuel oil underground storage tanks (USTs), two (2) 10,000-gallon fuel oil USTs, and two (2) 5,000-gallon gasoline USTs. All known and identified USTs were removed from the site for proper disposal in June 2011 by the CT Department of Energy and Environmental Protection Underground Storage Tank Program. The site is also filled with wide spread polluted fill, as well as contaminated building materials in the remaining site structures including a former office building and coal silos as determined during the Phase II and Phase III investigations. As such, the remaining contamination is characterized as primarily hazardous substances with some comingled residual petroleum.

Site Activities to Date

ENVIRONMENTAL SITE ASSESSMENT	CONSULTANT	DATE
Targeted Subsurface Investigation Report	Loureiro Engineering Associates, Inc. (LEA)	August 2010
Underground Storage Tank Closure Report	Loureiro Engineering Associates, Inc. (LEA)	September 2012
Phase I Environmental Site Assessments (ESA)	HRP Associates, Inc. (HRP)	October 2012
Phase II ESA	HRP Associates, Inc. (HRP)	January 2013
Phase III ESA/Remedial Action Plan (RAP)	HRP Associates, Inc. (HRP)	October 2013

Nature of threat to public health and environment

Chemical classes detected at the Site include VOCs, EPH/PAHs, Asbestos and metals.

Volatile Organic Compounds (VOCs)

Petroleum-related VOCs have been detected on-Site, potentially emanating from former storage tanks or past incidental spills. In comparison to other organic compounds, VOCs are generally less complex molecules with lower molecular weights. Therefore, VOCs generally have higher aqueous solubilities, contributing to their propensity to mobilize in groundwater, as well as a higher tendency to volatilize from the groundwater to the vapor phase.

Extractable Petroleum Hydrocarbons (EPH) / Polycyclic Aromatic Hydrocarbons (PAHs)

ETPH and PAH constituents that may have originated from petroleum products are considered petrogenic in nature, while pyrogenic constituents were created as by-products of incomplete combustion. Compounds of this class are generally more complex than VOC, and therefore have heavier molecular weights, contributing to a lower mobility in soil and lower aqueous solubility. These compounds commonly have higher organic carbon partition coefficients are not as likely to be conveyed in the aqueous phase in groundwater, and therefore have low relative mobility.

Asbestos in Soils and Building Materials

Asbestos building materials including floor tiles have been found in the building and in exterior soil piles that were illegally dumped on the site. The demolition and remediation of the property will remove these materials for proper disposal.

Lead in Soils

Moderate levels of lead above RSR standards which is associated with the historic gasoline storage tanks and contaminated fill will be removed from the site for proper disposal as part of the remediation work plan.

III. COMMUNITY INFORMATION

Community Profile

The Town of Stratford is located in the southeast corner of Fairfield County, Connecticut, on the shores of Long Island Sound and the Housatonic River. The town is directly east of the City of Bridgeport and is part of the Greater Bridgeport Region, which includes the Towns of Easton, Fairfield, Monroe and Trumbull, as well as the City of Bridgeport. Stratford is 60 miles from New York City and is in the New York Metropolitan Area. Boston is 120 miles east of the town. The Metro-north commuter railroad has a stop in Stratford. Both I-95 and Merritt Parkway (State

Route 15) traverse the town. A ferry runs from Bridgeport to Port Jefferson, Long Island. Stratford serves as a bedroom community for both Bridgeport and New York City.

Stratford has long-been associated with a local economy characterized by heavy industrial manufacturing. It is an extensively urbanized community and has historically been a center of defense and aviation industry within the region. As the birthplace of the American helicopter industry, Stratford has been home to such private manufacturers as Sikorsky Aircraft, the world's leading helicopter manufacturer, as well as the defunct U.S. Army Engine Plant. It is also the home to the now-defunct Raymark Industries, an EPA Superfund site whose legacy of contamination has left an indelible mark on the Town. The Army Engine Plant and Raymark serve as reminders of the history of irresponsible manufacturers that have polluted the Town, rendered so much of its property dangerous and unusable, and placed residents health and safety at grave risk.

A 1959 Chamber of Commerce brochure on Stratford's industrial and manufacturing businesses listed no fewer than 90 establishments that mainly supported defense manufacturing at the U.S. Army Engine Plant, AVCO and Sikorsky Aircraft. Most of these businesses manufactured such products as boats, machine tools and parts, electrical products, wire and cable, iron and steel forgings, disinfectants and other chemicals, rubber products, and mold castings.

2350 Stratford Avenue is one of a list of 80 properties in Stratford known or strongly suspected by the Town to contain hazardous materials from manufacturing and related operations, ranging in size from a quarter of an acre to 19 acres (exclusive of Raymark Superfund sites). These properties are predominately found in the Town's South End neighborhood, which is the location of the subject property. Stratford's Economic Development Department estimates that at least 20% of the South End's total land area is comprised of contaminated commercial and industrial properties. Many of those are found along what is referred to as the Stratford Avenue corridor, which leads from the border between Stratford and Bridgeport to Main Street. This corridor serves as the entryway into the Town's Stratford Center Historic District and Transit Centered Development district.

Demographic Information

	Targeted Investment Area (South End-Census Tract 802)	Stratford	State of CT	National
Population (1)	4,298	51,384	3,574,097	308,745,538
Unemployment (2)	28.5%	7.5%	6.9%	6.6%
Poverty Rate (3)	10.94%	4.8%	9.15%	13.82
Percent Minority (3)	76.1%	30.8%	22.4%	26.7%
Median Household Income (3)	\$57,308	\$67,530	\$67,740	\$51,914

(1) and (3) Sources: Census.gov, USA.com; (2) Sources: Census.gov, USA.com, State of CT Department of Labor-Office of Research

Chronology of Community Involvement

Date	Subject
March 2011	The Town of Stratford took title to the property through municipal tax foreclosure.
October 2012 – October 2013	The Town of Stratford completed Environmental Assessments of the Property including Phase I – Phase III and prepared a Remedial Action Plan (RAP) and Demolition Specifications
January 2013 – Ongoing	The Town continues to hold monthly public meetings of the Stratford Redevelopment Authority. Agenda items include progress on Town owned Brownfield parcels including the Mercer Coal Property at 2350 Stratford Avenue, Stratford, Connecticut
December 2013	The Town of Stratford held a public meeting regarding the draft Brownfield Grant Application for the Mercer Coal Property. No Comments were received.

Key Community Concerns

Health concerns are noted in prior sections. The Site is a known brownfield and is a historically contaminated property with expected soil and ground water contaminants. This project will remove the threats that currently exist of contaminated soil from past uses of the property. This topic will be updated as the remediation plans develop in the form of the administrative record.

Continued Community Involvement

The Town of Stratford Redevelopment Authority has held several public participation sessions in compliance with the pre-application EPA Brownfield Grant Requirements. The overall goal of the Community Relations Program is to continue to communicate the environmental issues at the Site to all stakeholders, Town, CT DEEP, EPA, local officials, and community residents. The Community Relations Program keeps local officials and residents informed of the status of all site activities and provide opportunities for interested citizens to participate in the Removal Action process.

The high levels of community involvement regarding this proposed redevelopment call for a community relations program that further fosters a good relationship among the neighborhood, Town officials, and other interested parties.

The community relations program at the Site has the following specific objectives:

1. To establish and maintain communication between the Town of Stratford, CT DEEP, EPA, and interested residents, businesses, and organizations. The Town will announce public meetings through a variety of media forums that include notice in the local paper, display on the Town of Stratford's website and postings in Town Hall.
2. To keep local officials informed of and involved in environmental activities for the Site so that they will be prepared to respond to questions from the public and media.

3. To inform all stakeholders of the goals and procedures of the remediation activities. This information will be discussed in a non-technical manner.

IV. OTHER COMMUNITY RELATIONS ACTIVITIES

This section lists specific community relations' activities that will be carried out to meet the objectives of the Community Relations Plan.

1. Maintain Information Repository.

The Town of Stratford Conservation Department is the designated information repository for the Site. The address for this repository is included in Appendix A. EPA will review the information repository periodically to ensure that they are up-to-date and include all pertinent Site information. The Town will ensure that the Town Hall files have all of the required documents for the Site.

2. Provide an Information Contact for the Community.

To meet the information needs of Town officials and community members, the Town has designated Brian Carey, Conservation Administrator as the information contact for this project. The contact information is listed in Appendix B and will be included in all information materials distributed to the public.

3. Hold Public Meetings and Comment Periods.

The Town will hold a public meeting and provide a 30-day comment period on the Analysis of Brownfield Cleanup Alternatives (ABCA) to provide an opportunity for the public to ask questions and comment on the ABCA plan. Other public meetings and comment periods will be held as necessary, including after the remediation activities are complete.

The Town will send an announcement of each public meeting and comment period to the local officials and news media. The meeting notice will be posted at Town Hall and appear on the Town's website.

Meetings will be held at either the Town Hall or the Stratford Public Library which are both located near the Site.

4. Review the Community Relations Plan.

The Town will review the Community Relations' Plan and revise it as needed to ensure that it provides programs of community relations' activities appropriate to on-going activities.

APPENDIX A

Locations for Public Meetings and Information Repository

Public Meetings

Town of Stratford
Stratford Town Hall
2725 Main Street
Stratford, CT 06615

Town of Stratford
Stratford Library Association – Public Library
2203 Main Street
Stratford, CT 06615

Contacts

Brian Carey, Conservation Director
Town of Stratford – Conservation Department
550 Patterson Avenue, Stratford, CT 06615
Phone: (203) 385-4006
brownfields@townofstratford.com

Information Repository

Town of Stratford – Conservation Department
550 Patterson Avenue
Stratford, CT 06615
Office Hours: Monday-Friday 7:00 am to 3:00 pm
(Or as Scheduled in Advanced)

APPENDIX B

Key Contacts

A. U.S. Environmental Protection Agency

Kathleen Castagna, Project Officer
Brownfields Project Officer
Brownfields Project Officer
U.S. EPA, Region 1
5 Post Office Square, Suite 100
Boston, MA 02109-3912
Phone (617)-918-1429
Email: Castagna.Kathleen@epa.gov

B. State Agency

Mark Lewis
CT DEEP Brownfields Coordinator
Department of Energy & Environmental Protection
79 Elm Street, Hartford, CT 06106
Phone: (860) 424-3768
Email: mark.lewis@ct.gov

C. Town of Stratford

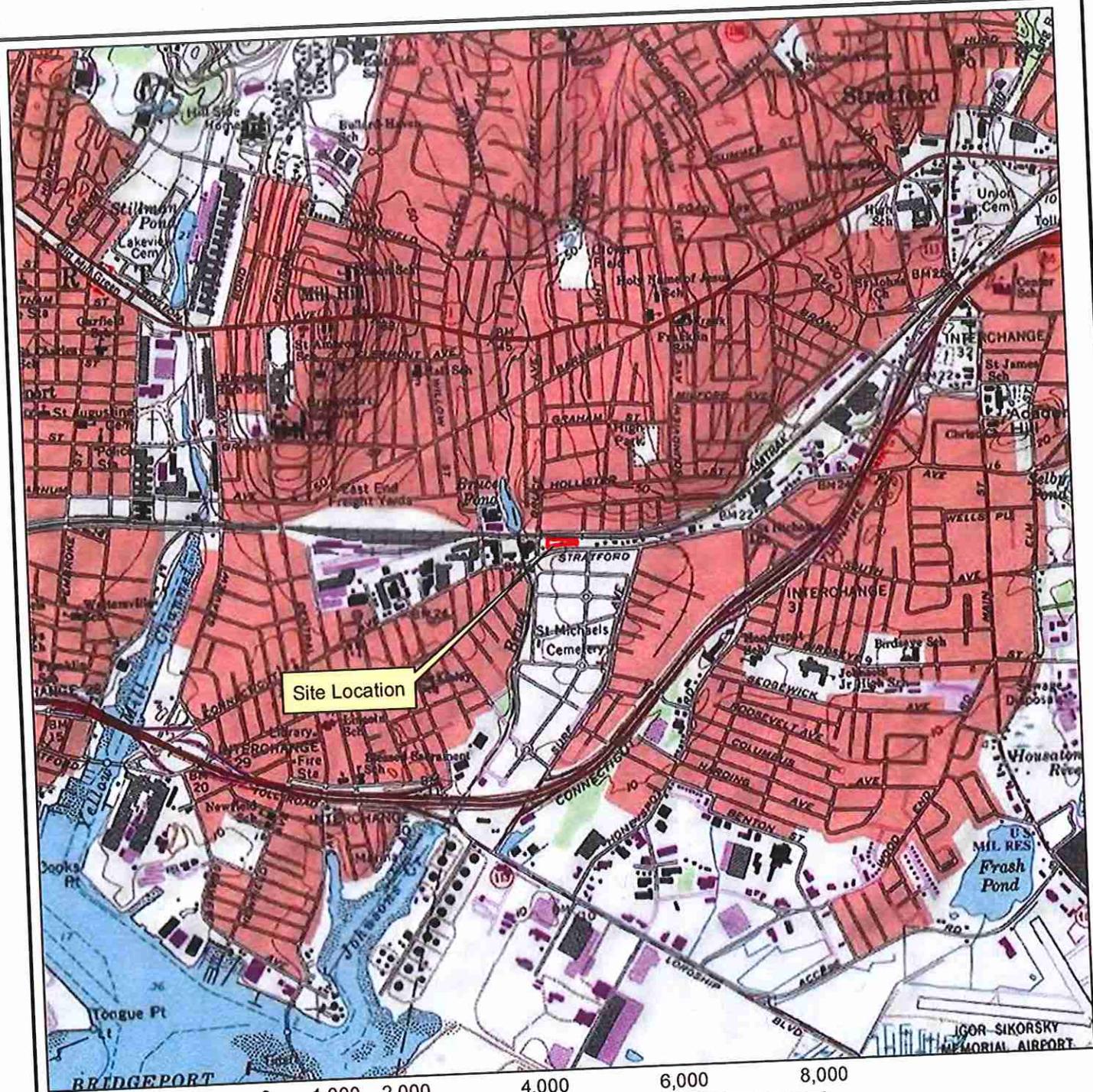
Brian Carey, Conservation Director, 203-385-4006
Stratford Conservation Department
550 Patterson Avenue, Stratford, CT 06615
E-Mail: bcarey@townofstratford.com

D. Local Officials

John A. Harkins, Mayor 203-385-4001
Karen Kaiser, Economic Development Director 978-538-5770
Stratford Town Hall
2725 Main Street, Stratford, CT 06615

FIGURE 1

SITE LOCATION MAP



0 1,000 2,000 4,000 6,000 8,000 Feet

1 inch = 2,000 feet

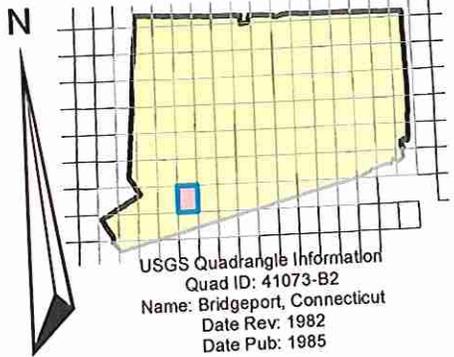


Figure 1
Site Location
2350 Stratford Avenue
Stratford, Connecticut
HRP# STR6008.P2
Scale 1" = 2,000'

HRP Associates, Inc.
 Environmental/Civil Engineering & Hydrogeology
 Creating the Right Solutions Together
 Offices in CT, SC, NY, FL, MA, TX and PA
 999 Oronoque Lane, 2nd Floor
 Stratford, Connecticut, 06614
 Ph:(203)380-1395 Fax:(203)380-1438
 www.hrpassociates.com



Photo 1: Groundwater monitoring well located to the west of the on-site building.

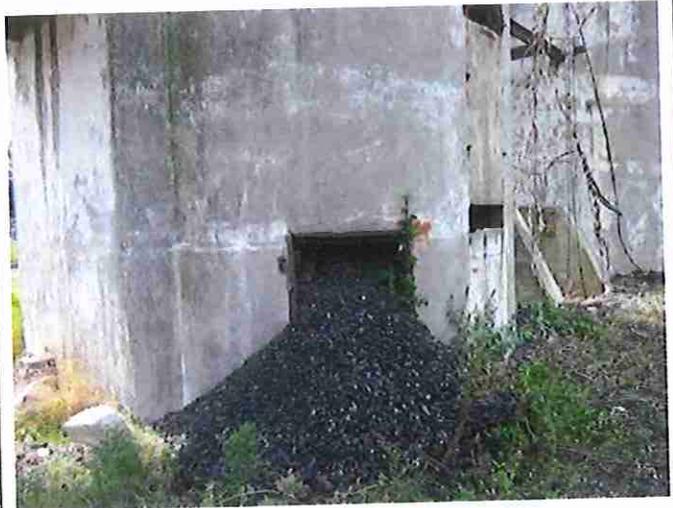


Photo 2: Coal and/or slag emanating from the silos.



Photo 3: Used tires stored beneath the coal silos.



Photo 4: Container of unknown substance beneath the coal towers.



Photo 5: Demolition debris located to the north of the coal towers.

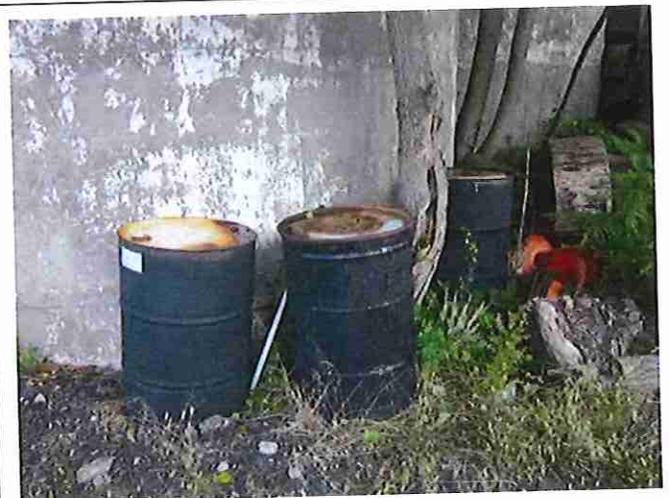


Photo 6: 55-gallon drums of investigation derived waste, left by others, located southwest of the coal towers.



Photo 7: Eastern grouping of silos, with lift shaft to the west.



Photo 8: Staining located within a small paved area on the south-central property boundary.



Photo 9: View of vehicle storage, equipment storage, and 55-gallon drums located to the west of the building.

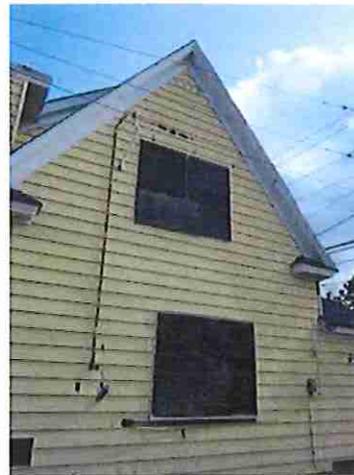


Photo 10: Western façade of the on-site building.

FIGURE 2

Schedule of Community Relations Activities

Community Relation Activities	Completion of CRP	During ABCA Review	Submittal of Generic QAPP to EPA	Start Demolition and Removal Action
Information Repository	Update as Needed			
Information Contract	Update as Needed			
Contact Local Officials	Update as Needed			
Press Release/Public Notices	Update as Needed			
Public Meeting & Comment Period		One during plan review comment period		After Removal Action is Complete
Information Updates	Update as Needed			
Review of CRP	Update as Needed			