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COMMUNITY RELATIONS PLAN FORMER DANIEL'S MILL 98 East Main Street Vernon, Connecticut

October 2023

File No. 05.0045441.12



PREPARED FOR:

Town of Vernon

Vernon, Connecticut

GZA GeoEnvironmental, Inc.

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October 2, 2023
GZA File No. 05.0045441.12

United States Environmental Protection Agency Region I
5 Post Office Square, Suite 100
Boston, Massachusetts 02109-3912

Attention: Ms. Lorraine Byrne

Re: Community Relations Plan
Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup
Cooperative Agreement - Grant #: 00A00826
Former Daniel's Mill
98 East Main Street
Vernon, CT

Dear Ms. Byrne:

As required under the Brownfields Multipurpose, Assessment, Revolving Loan Fund, and Cleanup Cooperative Agreement between the Town of Vernon, Connecticut and the Environmental Protection Agency (EPA), GZA GeoEnvironmental, Inc. (GZA), on behalf of the Town of Vernon, has prepared the enclosed Site-Specific Community Relations Plan (CRP) for the Former Daniel's Mill facility located in Vernon, Connecticut for your review and approval.

Should you have any questions or comments regarding the enclosed Site-Specific Community Relations Plan, please feel free to contact either David Rusczyk at 860-858-3110 or Shaun Gately at 860-870-3637.

Very truly yours,

GZA GeoEnvironmental, Inc.

David J. Rusczyk, P.E.
Associate Principal

Adam T. Henry, LEP
Consultant/Reviewer



**COMMUNITY RELATIONS PLAN
FORMER DANIEL'S MILL
98 EAST MAIN STREET
VERNON, CONNECTICUT**

OVERVIEW

This Community Relations Plan (CRP) has been prepared consistent with Section V.B of the Brownfields Cleanup Revolving Loan Fund (BCRLF) Administrative Manual, 40 CFR 300.415(n), 40 CFR 300.820(a)(3) and 40 CFR 35.6105(a)(2)(iv). The goal of this Site-Specific Community Relations Plan (CRP) is to outline the Town of Vernon's strategy to address the needs and concerns of residents potentially affected by the proposed remedial and redevelopment activities at the Former Daniel's Mill facility located at 98 East Main Street (herein referred to as the Site). The CRP outlines how the Town and the developer has involved, and will continue to involve, affected residents, Town officials and local organizations in the decision-making process regarding the environmental cleanup and redevelopment of the Site.

The goals of the CRP are to:

- Provide community members with accurate, timely and understandable information about Site activities that reflects their communication preferences and culture.
- Initiate and support two-way communication between the Town and community members, including careful consideration of community member comments.
- Ensure community members have opportunities for involvement in a wide variety of Site-related activities.

Resident involvement in neighborhood issues are essential resources for the success of the CRP because residents have a comprehensive understanding of the project area and hold positions of responsibility within the community. The Town perceives these citizens as key points of contact and communication with the neighborhood. The success of the environmental cleanup and subsequent redevelopment of the 98 East Main Street property hinges on informed citizen involvement in each step of the process.

SPOKESPERSON AND INFORMATION REPOSITORY

The Spokesperson for this project is Mr. Shaun Gately, who may be contacted at:

Town of Vernon
Director of Development Services and Economic Development
55 West Main Street
Vernon, CT 06066-3991
860-870-3637
sgately@vernon-ct.gov



The Information Repository for this project will be the Town of Vernon's website. A link to the webpage is as follows:

<https://www.vernon-ct.gov/government/community-projects/vernon-brownfields>

The website contains technical reports that summarize the environmental testing completed at the Site, the nature of the contaminants detected, an evaluation of remedial alternatives, and the selected remedial approach to address the contaminants and allow redevelopment of the Site. Response to public comments and verification of the cleanup of the Site will be added as the information becomes available. Copies of technical documents will also be available for review by appointment at:

Development Services and Economic Development Office
Town of Vernon
55 West Main Street
Vernon, CT 06066-3991

Appointments can be made by contacting Mr. Shaun Gately at 860-870-3637 or at sgately@vernon-ct.gov

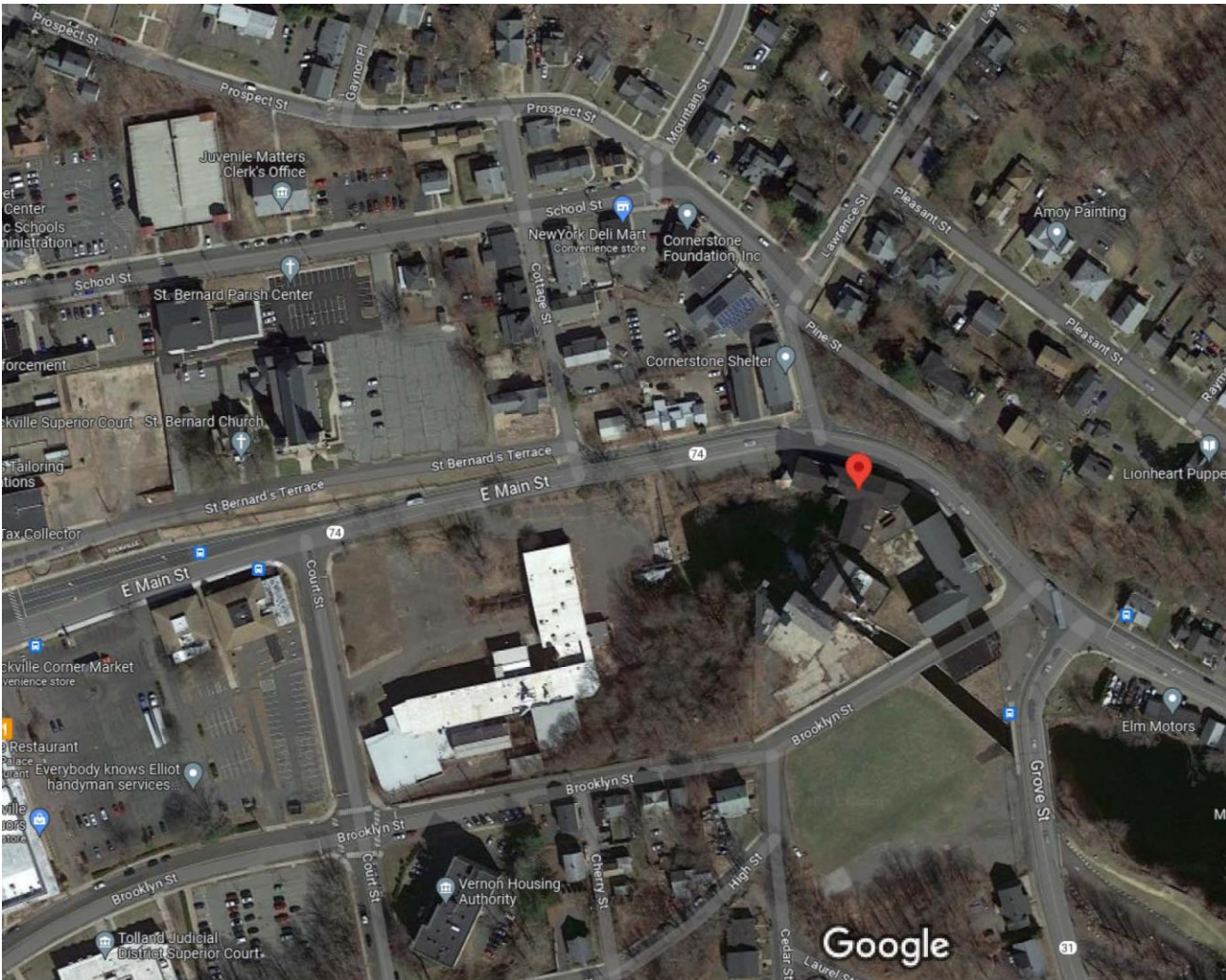
All public meetings will be held at Town Hall at the following address:

Town of Vernon Council Chambers
Memorial Building
14 Park Place
Vernon, CT 06066

The Memorial Building is an ADA accessible facility. Translation and interpretation services will be available at the meetings and an online (virtual) option will be available to further enhance the public accessibility/engagement.

SITE DESCRIPTION

The Site is located at 98 East Main Street in an industrial zone of Vernon, Connecticut and consists of an approximate 1-acre parcel of land. The Site is abutted by East Main Street to the north, the former Amerbelle Textile Mill to the east, American Mill Pond to the south and west, and by a former industrial facility (Anocoil) to the southwest. A Site Locus Plan is provided as **Figure 1** and a Site Plan is included as **Figure 2**.



The Site is the location of the former Daniel's Mill facility, which was built in approximately 1855. The Site is improved with a six-story (including basement and attic) historical mill building with a footprint measuring approximately 9,000 square-feet. Areas to the west of the Site building are currently predominantly asphalt paved and a narrow-grassed area is located to the east of the building. The Hockanum River runs from east to west through the abutting former Amerbelle Textile Mill property in a stone-lined raceway and discharges to the American Mill Pond located adjacent to the south and west of the Site. Historically, a portion of the river was diverted through the Daniel's Mill building via a raceway pipe to provide power to the former mill facility.

The Site is serviced by municipal water and sanitary sewer, natural gas, and electric services; however, Site utilities have been shut-off since the building has been vacant since 2014.

SITE HISTORY

The Site was reportedly developed as a textile mill which manufactured cotton, stockinet, and wool products between 1855 and 1951. Between 1951 and 1985, the Site was occupied by several tenants including:



Year	Name of Tenant	Description of Tenant Activities
1951-1978	Albi Manufacturing Company	Producer of fire-retardant paints and mastic
1952-1971	Double B Products	Producer of insecticides and paints.
1960	Conversion Chemical Corporation	Unknown
1960-1970	Outboard Shop & Sports Center	Unknown
1985-2000	Hockanum Salvage, Inc.	Unknown
1985	C&C Products Inc.	Unknown
1985	Furnace Brokers	Unknown

Subsequent to 1985, the Site building was occupied by various entities including: Band Room & Studio Rentals, Sol Cantor Electric, AI Enterprises (sheet metal workshop), Daniel's Mill Self Storage and Charity Storage. The Town of Vernon applied for Brownfield Municipal Liability Relief Protection (BMLRP) in September 2020 and acquired the Site in 2021. The building is currently vacant.

NATURE OF THREAT TO PUBLIC HEALTH AND ENVIRONMENT

In 2015, the Town of Vernon received a grant from the Connecticut Department of Economic and Community Development (DECD) to assess environmental conditions and facilitate future redevelopment and reuse of the Site. GZA GeoEnvironmental, Inc. (GZA), on behalf of the Town, completed several rounds of investigations to assess environmental conditions at the Site and the presence of hazardous building materials. Between 2015 and 2023, GZA completed several rounds of Site investigations which included the performance of 76 explorations, the installation of two monitoring wells, the laboratory analysis of over 100 soil, groundwater, and sub-slab soil vapor samples, and the laboratory analysis of 120 samples of concrete and wood flooring, wood beams and columns, wood ceilings, wood trusses, mastics, brick and masonry surfaces, plaster surfaces, and paints.

The results of these investigations identified the presence of certain compounds including polychlorinated biphenyls (PCBs), polyaromatic hydrocarbons (PAHS), lead, and petroleum hydrocarbons in soil at concentrations above the Residential Direct Exposure Criteria, the Industrial/Commercial Direct Exposure Criteria, and/or the GB Pollutant Mobility Criteria (GB-PMC) within the Connecticut Department of Energy and Environmental Protection (CTDEEP) Remediation Standard Regulations (RSRs) (RCSA 22a-133k-1 through 3). Copper, lead, and arsenic were also detected in groundwater at the Site at concentrations above the Surface Water Protection Criteria (SWPC) within the RSRs.



The PCB concentrations within building materials, in soils beneath the basement concrete floor, and in soils in certain exterior areas adjacent to the building are also regulated under the Toxic Substances Control Act (TSCA; 40 Code of Federal Regulations [CFR] 761).

The proposed remedial activities to address these identified impacts and facilitate development of the Site are outlined in the Remedial Action Plan (RAP), the Notification of a Self-Implementing Clean-Up, the Building Materials PCB Remediation Plan, and the Analysis of Brownfield Clean-up Alternatives (ABCA) submitted to the EPA and/or CTDEEP. These documents are also available to the community for review in the information repository listed above.

COMMUNITY BACKGROUND



Vernon, Connecticut is at the border between Tolland and Hartford counties, with an estimated population of approximately 30,000. Vernon sits at an estimated elevation of 350 feet above mean sea level and has a land area of approximately 17.7 square miles. Vernon was incorporated as a separate township in October 1808. The Town was incorporated in 1889 and consolidated with the Town of Rockville in 1965. Vernon operates under a mayor-town council form of government. The mayor is elected at large for a term of two years. The Town council has 11 elected members (two-year terms) and meets on the first and third Tuesdays of each month.

The former Daniel's Mill facility is located within the Rockville section of the Town. 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.

Rockville is a small, low-income community of 7,660 residents that are disproportionately impacted by legacy environmental burdens. The former Daniel's Mill facility is also within 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.



CHRONOLOGY OF COMMUNITY INVOLVEMENT

The Town of Vernon has been working collaboratively with the community on the redevelopment of the Former Daniel's Mill facility and the adjacent mill complexes (the Amerbelle and Anocoil Mills) 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 community stakeholders that form the Town's Brownfields Steering Committee (BSC) include the following:

Name of Organization/Entity/Group	Specific Involvement in the Project or Assistance Provided
Rockville Downtown Association and Opportunity Works	Non-profit, community-based organization; community liaison; support redevelopment efforts; conduct community outreach
Rockville Community Alliance	Community-based organization; community liaison; participation in town commissions on brownfield redevelopment; community outreach
Tolland County Chamber of Commerce	Liaison for regional businesses; support business recruitment; conduct outreach; collect input from local businesses
Vernon Volunteer's Collaborative	Coalition of 14 volunteer groups; preservation of Vernon's environment and historic properties; encouraging arts appreciation/participation; provide input on redevelopment plans; collect community's input
Vernon Community Network	Volunteer community agency; coordinate resources for community enrichment; provide input on reuse plans and employment opportunities
Vernon Mill Owner, LLC	Developer; provide consultation and leverage financial resources towards redevelopment

As part of the submittal of the BCRLF application, the Town held a public meeting to provide an overview of the Town's intent to apply for the grant and to review the application and the draft Analysis of Brownfield Cleanup Alternatives (ABCA) for the Site. The meeting was held on Thursday, November 18, 2021, from 6:00 pm to 7:00 pm at Town Hall's Council Chambers at 14 Park Place, Vernon, Connecticut. During this meeting, the Town 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@vernonct.gov or in writing. 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 households. A draft of the ABCA was also submitted to EPA for review.

After addressing comments from EPA, the Town held a subsequent public meeting to present the final version of the ABCA to the community. The meeting was held on Thursday, February 18, 2023, from 6:00 pm to 7:00 pm at Town Hall's Council Chambers at 14 Park Place, Vernon, Connecticut. A copy of the final version of the ABCA was also made available in the office of Economic Development located at 55 West Main Street, 2nd floor, Vernon, CT. Notice of this public meeting was published in the Journal Inquirer on February 8, 2023.



In addition to these meetings, notice was provided to the community in April 2023 of the planned remediation at the Site and the availability of a draft Remedial Action Plan. Notices included a legal advertisement in the Journal Inquirer, written notifications to the local Director of Public Health, and posting of a sign on the property regarding the planned remediation. Comments from the community were limited to a request from adjacent property owner for a copy of the draft Remedial Action Plan. A hard copy of the draft Remedial Action Plan was mailed to the property owner on April 26, 2023. No other comments or inquiries were received in response to the notice of remediation and final version of the Remedial Action Plan was submitted to the CTDEEP.

The following table provides a chronology of Community Involvement:

Date	Item	Subject
11/8/2021	Legal Notice of Public Meeting	Present Drafts of the Analysis of Brownfields Cleanup Alternatives Report and the BCLRF Application
11/18/2021	Public Meeting	Present Drafts of the Analysis of Brownfields Cleanup Alternatives Report and the BCLRF Application
2/8/2023	Legal Notice of Public Meeting	Present the final version of the Analysis of Brownfields Cleanup Alternatives Report
2/18/2023	Public Meeting	Present the final version of the Analysis of Brownfields Cleanup Alternatives Report
4/15/2023	Legal Notice of Remediation and the Availability of the draft Remedial Action Plan Report	Availability of draft Remedial Action Plan Report

CONTINUED COMMUNITY INVOLVEMENT

The redevelopment of the Former Daniel's Mill facility combined with the adjacent mill complexes is a multi-year, multi-phase project. Beyond the initial community outreach/involvement described above, neighborhood communities or members of the public may from time-to-time request updates or have questions, comments or concerns regarding the project and/or environmental conditions on the property and actions taken or planned to protect public health and safety. All comments, questions and public input are welcome and will be specifically addressed in a timely fashion. The Spokesperson for this project, Mr. Shaun Gately, will act as the point person to answer or direct the answering of any questions that are asked by members of the public.

The Spokesperson may, from time-to-time also schedule additional community meetings if significant public interest is expressed or similar questions are asked by a number of members of the public, indicative of a community-based concern. Additionally, if environmental problems are discovered on the property that have the potential to adversely affect the community, the Spokesperson will solicit input and address any concerns so that the needs of both the project and the community are addressed.

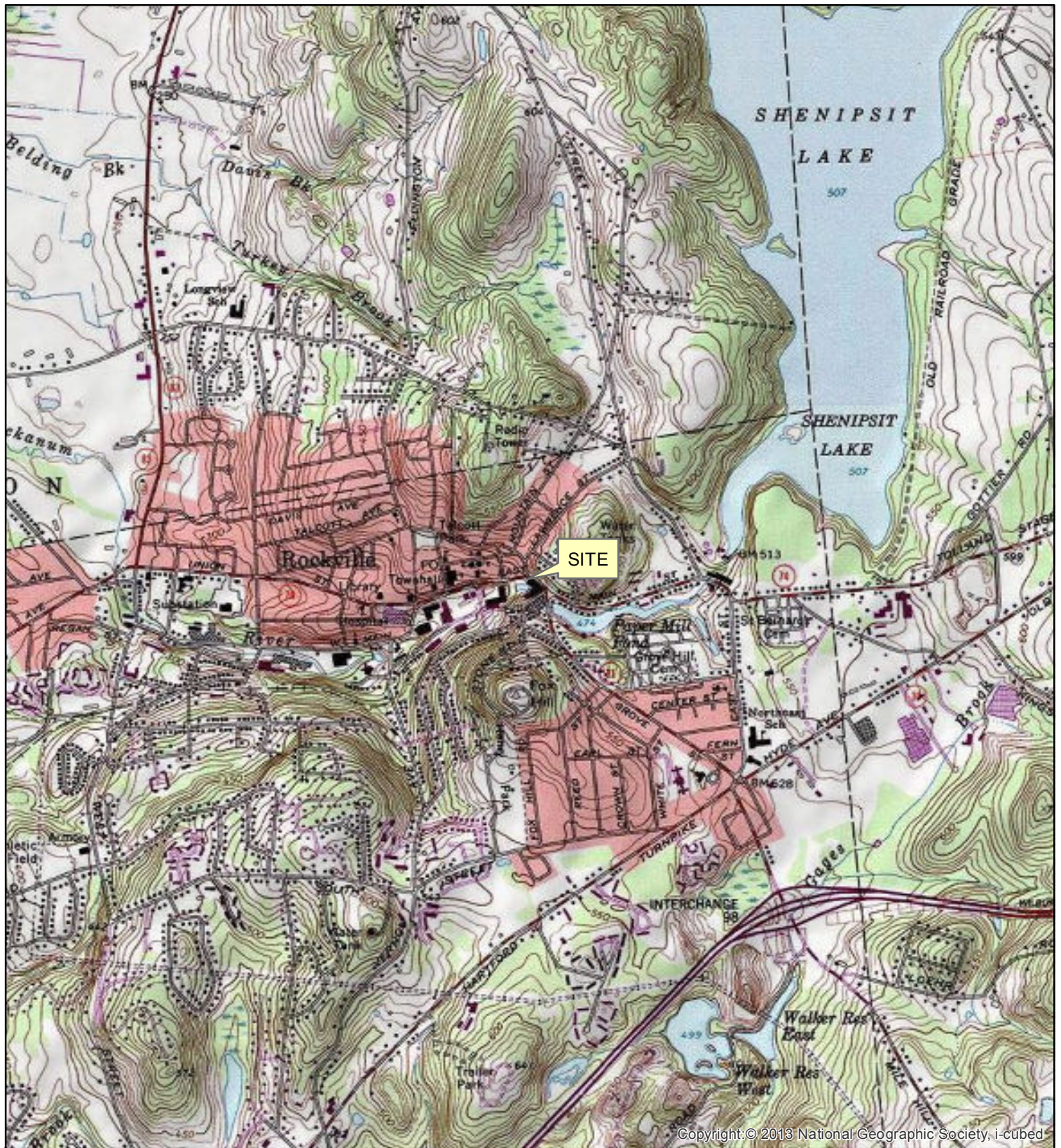


The Town's plan for continued community engagement for this project includes the involvement of BSC members and the following activities:

- **Stakeholder Meetings:** Stakeholder meetings will be held semi-annually in Town Hall and will be open to the public. The meetings will be utilized to update stakeholders and the community on the status of the project, answer questions, and to solicit input. Notice of the meetings will be posted on the Town's website and published in the Journal Inquirer a minimum of 20 days in advance through the Town's Communication Specialist office. All public meetings will be held at the Town's Council Chambers with the Memorial building which is an ADA accessible facility. Translation and interpretation services will be available as well as an online virtual option for participation.
- **Informational Materials:** The Town's website will be utilized to provide information and updates on the project, technical information and reports, and a calendar of events. A Fact Sheet will be developed for the project that provides background information on the project, the status of the work, and anticipated schedule. The Fact Sheet will be periodically updated upon achieving certain milestones such as receipt of regulatory approvals, issuance of bid packages to complete the work, and initiation of remedial activities. The Fact Sheet will be posted in English and Spanish and available on the Town's website and at future public meetings. Informational materials in English and Spanish will also be sent directly to the residents' addresses directly 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 incorporated into the development plans to extent feasible. Involvement of key stakeholders including community-based organizations will be instrumental in conducting outreach for the project and soliciting public input.
- **Signage:** A sign will be posted at the Site that lists the name of the project, includes contact information for questions and information about the project, and identifies the names of the funding sources (the Environmental Protection Agency and Connecticut Department of Economic Development with their logos).



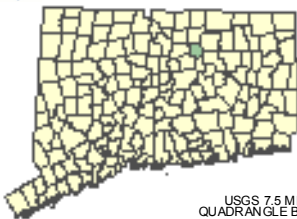
FIGURES



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GZA GeoEnvironmental, Inc.
Engineers and Scientists
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USGS 7.5 MINUTE
QUADRANGLE BASE MAP:
ROCKVILLE, CONNECTICUT
1997

SITE LOCUS

98 EAST MAIN STREET
VERNON-ROCKVILLE, CONNECTICUT

Source: TOPO! maps are USGS topographic maps, Copyright: © 2011 National Geographic Society, i-cubed and are provided by arcgisonline.com.

PROJ MGR: JTH

REVIEWED BY: JTH

PROJECT NO. 05.0045441.03

DESIGNED BY: BAG

DRAWN BY: MJS

DATE: 07-16-15

THIS MAP HAS BEEN COMPILED FROM OTHER MAPS AND/OR SOURCES OF INFORMATION.
THIS MAP SHOULD NOT BE CONSTRUED AS A PROPERTY SURVEY, NOR USED FOR CONSTRUCTION PURPOSES.

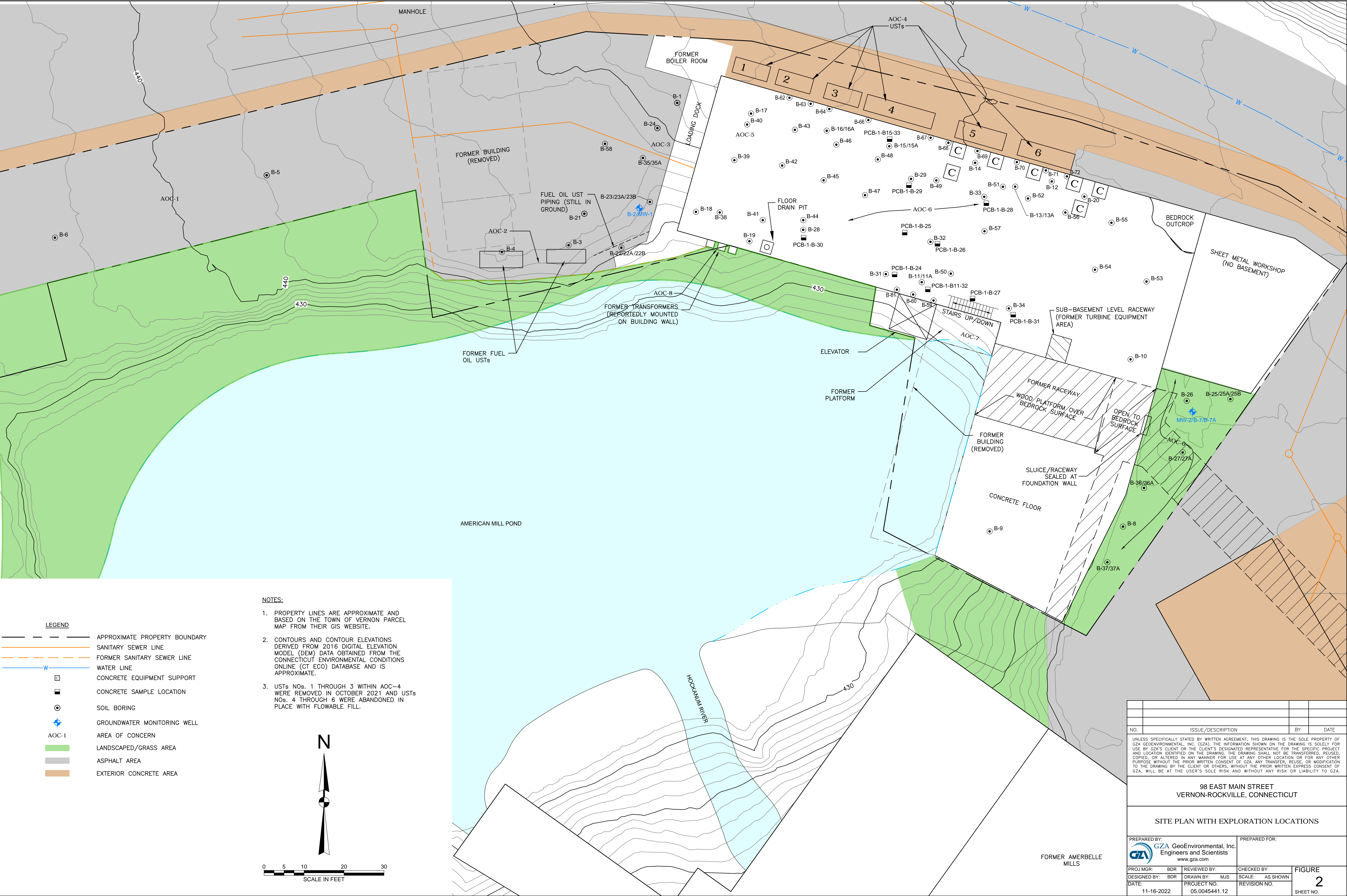
0 1,000 2,000 4,000 6,000 8,000

Scale in Feet



FIGURE

1



NOTES:

1. PROPERTY LINES ARE APPROXIMATE AND BASED ON THE TOWN OF VERNON PARCEL MAP FROM THEIR GIS WEBSITE.
2. CONTOURS AND CONTOUR ELEVATIONS DERIVED FROM 2016 DIGITAL ELEVATION MODEL (DEM) DATA OBTAINED FROM THE CONNECTICUT ENVIRONMENTAL CONDITIONS ONLINE (CT ECO) DATABASE AND IS APPROXIMATE.
3. USTs NOS. 1 THROUGH 3 WITHIN AOC-4 WERE REMOVED IN OCTOBER 2021 AND USTs NOS. 4 THROUGH 6 WERE ABANDONED IN PLACE WITH FLOWABLE FILL.

LEGEND

- APPROXIMATE PROPERTY BOUNDARY
- SANITARY SEWER LINE
- FORMER SANITARY SEWER LINE
- WATER LINE
- CONCRETE EQUIPMENT SUPPORT
- CONCRETE SAMPLE LOCATION
- SOIL BORING
- GROUNDWATER MONITORING WELL
- AOC-1
- AREA OF CONCERN
- LANDSCAPED/GRASS AREA
- ASPHALT AREA
- EXTERIOR CONCRETE AREA



0 5 10 20 30
SCALE IN FEET

NO.		ISSUE/DESCRIPTION	BY	DATE
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98 EAST MAIN STREET VERNON-ROCKVILLE, CONNECTICUT				
SITE PLAN WITH EXPLORATION LOCATIONS				
PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com			PREPARED FOR:	
PROJ MGR: BDR	REVIEWED BY: MJS	CHECKED BY:	FIGURE	
DESIGNED BY: BDR	DRAWN BY: MJS	SCALE: AS SHOWN	2	
DATE: 11-16-2022	PROJECT NO. 05.0045441.12	REVISION NO.	SHEET NO.	