

**Community Relations Plan
U.S. EPA Brownfields Cleanup Grant
Former Star Pin Facility 267 Canal Street Remediation Project
Shelton, Connecticut
November 2022**

Introduction and Overview

This Community Relations Plan (CRP) has been developed by the Shelton Economic Development Corporation (SEDC) to document and describe outreach efforts that are proposed to be implemented to engage, inform, and address residents and community members that may potentially be affected by the proposed cleanup of the former Star Pin facility located at 267 Canal Street in Shelton, CT (the site). The CRP explains how the City has involved, and will continue to involve, affected residents, local organizations, and City officials in the decision-making process with regard to environmental remediation at the site.

The cleanup project is being funded by a US EPA Brownfields Cleanup grant awarded to the City in 2020 as well as funding provided by the Connecticut Department of Economic and Community Development (CTDECD). The City's goal is to complete cleanup of the site so it can be transferred to a developer to facilitate site reuse/redevelopment. The redevelopment of the site is part of the City's long-term vision and revitalization of properties along Canal Street and within the City's downtown area.

Spokesperson & Information Repository

The SEDC will oversee implementation of the cleanup activities at the site with assistance from Tighe & Bond, Inc. retained as the Licensed Environmental Professional (LEP) for the project. SEDC contact information is as follows:

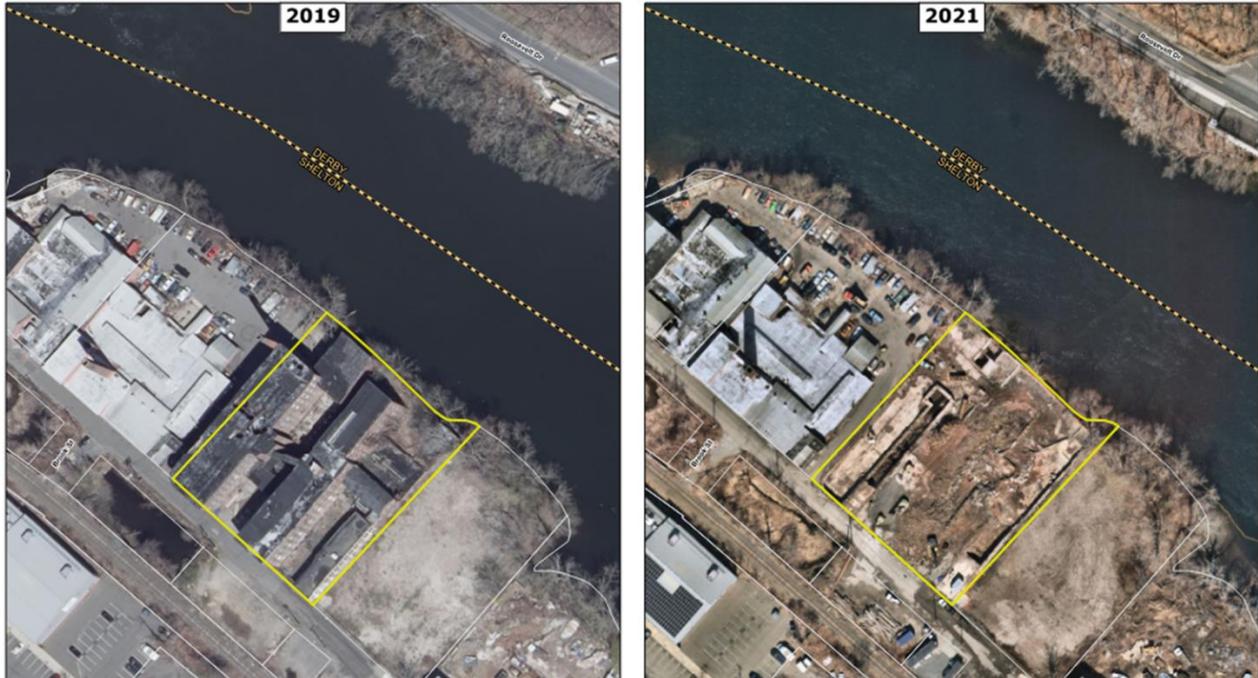
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An Information Repository for the project has been developed and is available for review at the SEDC during normal business hours (Monday-Friday, 9am-5pm).

Additionally, all documents included in the Information Repository will be available digitally from the SEDC webpage at <https://www.sheltonedc.com/notices>. The web address will be provided to the community in all public notices and project signs.

Site Description & History

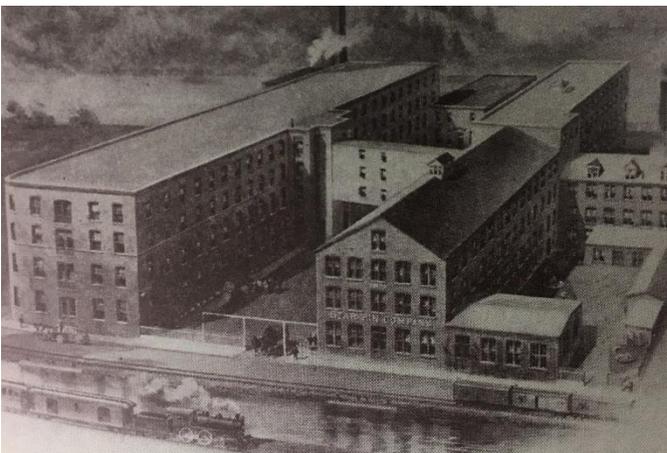
The site includes one parcel of land totaling approximately 1.4-acres located on the eastern side of Canal Street and identified on Map 139 as Lot 5 by the City of Shelton's Tax Assessor's office. The site is currently owned by the City of Shelton.



The site is bounded to the north by the Housatonic River and to the south by Canal Street. A vacant parcel of land formerly occupied by Better Packages, Inc., a manufacturer of water-activated packing tape dispensing systems, borders the site to the East. A multi-tenant industrial facility is located to the immediate west of the site.

Until June 2020, the majority of the site was developed with six industrial buildings originally constructed between 1870 and 1906. In June 2020, a fire destroyed most of the interior and roofs of the site buildings and portions of these structures not destroyed by the fire were subsequently razed. Currently, only remnants of the building foundations, three raceways, and portions of concrete floors and asphalt driveways remain.

The Star Pin Company was founded on September 25, 1866 and originally produced pins and



hair pins within a 5,000 square foot frame mill in the Wells Hollow section of Shelton. One of the founders and early officers of the company, James C. Hubbard, initially operated a pin shop in North Haven and is credited with inventing one of the first automated hair pin making machines in the United States.

By 1906, the firm employed over 125 workers producing its lines of pins, hair pins, and garment hook and eyes. The company continued to grow, hitting its peak during the 1920s when the firm employed 400 people and the facility was expanded to encompass 125,000 feet of total floor space. By this time, the plant had reached its last configuration and was comprised of an adjoining complex of approximately six identifiable red brick buildings with a total frontage of roughly 215 feet on the east side of Canal Street.

The Star Pin Factory utilized three raceways that extended from the former canal northeast to the Housatonic River. Similar to other industrial facilities along Canal Street, the raceways were used by the former Star Pin Company to generate power for its manufacturing operations. Though it is not clear when the use of the raceways to generate power at the Site ceased, a 1973 Hartford Courant article highlighted the fact that the Star Pin Company was one of the last firms in the state continuing to employ water powered generation, which it reportedly used to generate lighting.



In addition to the Former Star Pin Company, the site has a long history of commercial and industrial uses including operations conducted by plating companies, firearms manufacturers, circuit board manufacturers and vacuum cleaner manufacturers. Industrial tenants that occupied the property include but are not limited to: Auto-Swage Products, Inc. (1961-1962), Plating Specialties, Inc. (1977-1997), Genie Home Products, Inc. (1985), Shelton Circuits (1990-1994), Shelton Products (1995-1998), Charter 2000, LLC (1998-2007), and Alegna Corporation (1996-2015).

Site Regulatory Status

An "Establishment" is defined as any real property at which or any business operation from which (A) on or after November 19, 1980, there was generated, except as the result of (i) remediation of polluted soil, groundwater or sediment, or (ii) the removal or abatement of building materials, more than one hundred kilograms of hazardous waste in any one month, (B) hazardous waste generated at a different location was recycled, reclaimed, reused, stored, handled, treated, transported or disposed of, (C) the process of dry cleaning was conducted on or after May 1, 1967, (D) furniture stripping was conducted on or after May 1, 1967, or (E) a vehicle body repair facility was located on or after May 1, 1967.

The site may be identified as an "establishment", as defined by Section 22a-134 (the CT Transfer Act) of the Connecticut General Statutes (CGS), because of the handling and disposing of hazardous waste and the generation of more than one hundred kilograms of hazardous waste in any one month. The site was previously entered into the CT Department of Energy and Environmental Protection (CTDEEP) Property Transfer Program in 1995 under a Form-III filing. The site was subsequently transferred again in 2008. The site was assigned remediation ID 9035 by the CTDEEP. Alegna, LLC was listed as the Certifying Party for both transfers and was therefore responsible for investigating remediating the site in accordance with prevailing standards and guidelines.

State and federal grant funding requires the site to be enrolled in a CTDEEP cleanup program. The site is anticipated to be entered into the Brownfields Remediation and Revitalization Program (BRRP) authorized by Connecticut General Statute (CGS) Section 32-769. The BRRP was created by the Connecticut Office of Brownfield Remediation and Development. The Brownfield Remediation and Revitalization Program (BRRP) is designed to streamline in the redevelopment of brownfields properties.

The site is subject to cleanup requirements set forth in CT's Remediation Standard Regulations (RSRs) including the RES and I/C direct exposure criteria (DEC), GB pollutant mobility criteria (GB PMC), groundwater RES and I/C volatilization criteria (GWVC), and surface water protection criteria (SWPC).

Public Health & Environmental Concerns

The site is located adjacent to the Housatonic River along the east side of Canal Street and within the City's downtown revitalization area. The City has completed several environmental assessments for the site including Phase I, II, and III Environmental Site Assessments (ESAs) to determine the nature, degree, and extent of contamination. In addition, two major removal actions have been completed to remove waste materials and building debris from the site.

In general, various contaminants including petroleum substances, chlorinated solvents, metals, cyanide, and/or asbestos have been detected in multimedia (soil, sediment, concrete, and building debris) at the site. Groundwater is impacted by low levels of chlorinated solvents, metals, and Per- and Polyfluoroalkyl Substances (PFAS). Additional details associated with site investigation findings are provided below.

- The site is underlain by anthropogenic fill up to 20+ feet below ground surface. Fill materials have been found to contain extractable total petroleum hydrocarbons (ETPH), polycyclic aromatic hydrocarbons (PAHs), and metals at concentrations exceeding CTDEEP RSR criterion including the RES and I/C DEC and GB PMC.
- Surface sampling conducted as result of the fire indicated soils and ashy debris contain elevated concentration of ETPH, PAHs, metals, and possibly asbestos.
- VOCs with the exception of relatively minor concentrations of the chlorinated solvents, tetrachlorethylene (PCE) and trichloroethylene (TCE) have not been detected on the site. TCE has been detected at low concentrations in soil and groundwater along the southeast corner of the site.
- ETPH and PAHs have been detected in soils in various areas across the site but are most prevalent and exceed CTDEEP RSR criterion along the southeast corner of the site. ETPH has also been identified in the vicinity of former fuel oil tanks. ETPH and PAHs appears to be associated with both petroleum sources and site wide fill material.
- Polychlorinated Biphenyls (PCBs) have not been detected in any of the soil, sediment, and concrete samples collected at the site.
- Metals including arsenic, lead, cadmium, copper, zinc, nickel, and chromium have primarily been detected along the central and southeast corner of the site and exceed CTDEEP RSR criterion including the RES and I/C DEC. These metals appear to be attributed to former site operations, but particularly former plating and wastewater treatment and manufacturing.

- Cyanide was detected in soil samples where elevated metals were also detected but did not exceed CTDEEP RSR criteria.
- Concrete data indicate concrete is impacted with elevated ETPH and metals, and cyanide.
- Sediment data indicate elevated concentrations of ETPH, PAHs, and metals are present within sediment in site's raceways (particularly the southern raceway) as well as other subsurface structures.
- Depth to groundwater ranges from approximately 10 to 15 feet below ground surface and appears to be tidally influenced. Groundwater has been impacted by low levels of chlorinated solvents (TCE), metals, and Per- and Polyfluoroalkyl Substances (PFAS).



Based on investigation findings a remedial action plan (RAP) has been developed for the site. The RAP includes the removal and off-site disposal of environmental impacted media including soil, sediment, and concrete. However, the primary strategy includes capping impacted soils and site wide fill that can be left place with the future development (buildings, pavement, etc.) as allowed by the CTDEEP RSRs.

At this time, groundwater does not appear to be significantly impacted by site releases or from site wide fill. A combination of soil and sediment removal (source areas) and monitored natural attenuation groundwater monitoring is the proposed remedial strategy. In addition, an alternative surface water protection criterion (SWPC) can be calculated that takes account the dilution effects of the Housatonic River.

The remedial approach above will require the filing of an Environmental Use Restriction (EUR) to allow for residential redevelopment. The EUR would prohibit certain activities such as the disturbance of any cap. The remedial design and final RAP for the site will require integration of the site survey, additional input/plans associated with site redevelopment, regulatory input from CTDEEP and DECD, as well as public notice notifications. The final RAP would be designed to bring the site into compliance with the CTDEEP RSRs as well as address material management of other media such as the handling of impacted sediment and concrete which will require management and/or proper disposal during site redevelopment.

Redevelopment Vision

The redevelopment vision for the site is part of a long-term vision for revitalization of properties along Canal Street. The SEDC's primary objective is to evaluate the environmental conditions on each property located along Canal Street and to evaluate whether the buildings or soil contain any hazardous materials or residual chemical contamination. The goal of this effort is to devise a plan to address the environmental / building contamination issues, effect the successful clean-up and put these properties back into productive reuse.

The redevelopment concept for the site is residential and includes construction of two multi-story buildings designed to mirror the historic Star Pin factory buildings with on-site parking both below and at grade.

Community Background

The area surrounding the site was historically industrial with workforce housing neighborhoods. As the factories and businesses closed and jobs were lost, the area became impoverished and experienced years of disinvestment. Over the last several decades the City and SEDC have successfully redeveloped numerous historic industrial properties in effort to revitalize Canal Street and the City's downtown.

The site is located in Census Tract #1101 which includes an area of 0.3 square miles. According to 2020 census data, this area has a population of 2,976 persons of which 66% are white, 18% Hispanic or Latino, 7% Asian, 7% black, and 1% as other. The median age is reported to be 33.3 years old. The median household income is reported as \$73,107.

Community Involvement

The SEDC is the primary driver for brownfields redevelopment within the City of Shelton. The SEDC is governed by a 37-member Board of Directors comprising of local residents, members of the business community and municipal representatives who have an interest in the economic development efforts of the City of Shelton. The day-to-day operations are managed and supported by a President and Assistant and a 12-member Executive Board, which board is represented on the organization's Board of Directors. SEDC's boards meeting regularly to discuss the City's community development activities and objectives. Meeting agendas and minutes are posted regularly and can be found at the following webpage <https://www.sheltonedc.com/notices>.

SEDC's partners include the Economic Development Commission, Citizens Advisory Board, Planning and Zoning, and Conservation Commission. The Economic Development Commission is active within the following publications

- Shelton Life Community & Business News: A communication piece for the residents of Shelton. Over 18,500 copies are mailed and distributed an average of three times a year.
- Shelton Life City of Shelton Biennial Report: A biennial report of the City of Shelton, the state of its finances, commissions that serve the City and various activities.

Brownfields investigation, cleanup, and redevelopment activities are regularly updated in the above publications. In addition, assessment and cleanup of City brownfields are often highlighted in local newspapers (i.e., the Shelton Herald).

The SEDC has completed several environmental investigations of the former Star Pin Facility and is currently working to publicly bid the remediation project in an effort to further ready the site for redevelopment. Continued community and public involvement will include the following activities.

- As required by grant funding the project will be solicited via public bid and City of Shelton procurement processes. These activities will include input and involvement from regulatory agencies including USEPA, CTDECD, and CTDEEP.
- Public notification of remediation activities will be made to allow public input and comment on the proposed cleanup activities. Public notifications will include posting legal notices, mailing to abutting property owners, and local officials. Public notification

will also include signage at the site and include contact information to address comment or questions regarding site cleanup activities.

- Copies of cleanups plans including the RAP and an Alternative Brownfields Cleanup Analysis (ABCA) will be available for review through the SEDC.

CRP Implementation and Updates

The SEDC will be responsible for implementation of this CRP. This plan will be consulted during the course of the cleanup activities at the site to ensure appropriate community involvement and stakeholder engagement is fulfilled. This plan, and associated contacts and information, will be updated as necessary during the project.