

Narrative Information Sheet
EPA Cleanup Grant 2026
Environmental Cleanup Former Anaconda-American Brass/EWR Site

1. Applicant Identification:

The City of Waterbury
235 Grand Street
Waterbury, CT 06702

2. Website URL:

URL: <https://www.waterburyct.org/>

3. Funding Requested:

a) Grant Type: Multiple-Site Cleanup

b) Federal Funds Requested:

i. \$4,000,000

4. Location:

a) City: Waterbury

b) County: New Haven

c) State: Connecticut

5. Property Information:

Former Anaconda-American Brass/EWR Site

130 Freight Street (map block lot#0272-0022-0024), 170 Freight Street (map block lot#0272-0022-0021), and 000 West Main Street (map block lot#0272-0022-0022)

Waterbury, CT 06702

6. Contacts:**a) Project Director**

Mansi Doshi Civil and Environmental Engineer, Project Manager

Waterbury Development Corporation

83 Bank Street, 3rd Floor

Waterbury, CT 06702

203-346-2607 ext. 7285

doshi@wdconline.org

b) Highest Ranking Elected Official

Mayor Paul K. Pernerewski

The City of Waterbury

235 Grand Street, 2nd Floor

Waterbury, CT 06702

203-574-6712

ppernerewski@waterburyct.org

7. Population:

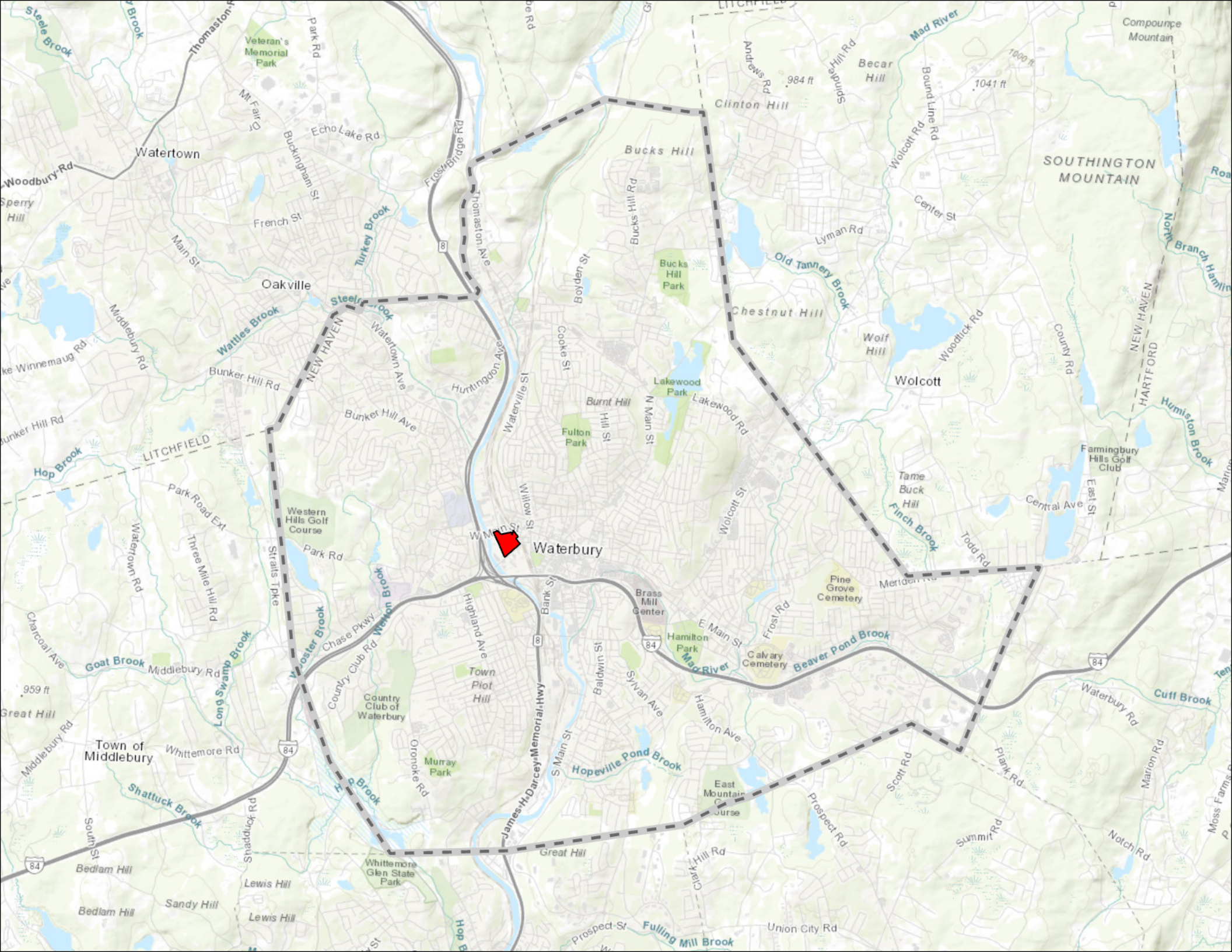
114,990 (U.S. Census, 2023 Redistricting Data)

8. Other Factors:

Other Factors	Page #
Community Population is 15,000 or less	
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	
The proposed site(s) is impacted by mine-scarred land.	
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the remediation/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	3
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).	2
The proposed site(s) is in a federally designated flood plain.	3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	
The target area(s) is impacted by a coal-fired power plant that has recently closed (2015 or later) or is closing.	

9. Releasing Copies of Applications:

N/A



Waterbury

SOUTHINGTON MOUNTAIN

Watertown

Wolcott

LITCHFIELD

NEW HAVEN

HARTFORD

HUMISTON

Town of Middlebury

Waterbury

Bedlam Hill

Sandy Hill

Lewis Hill

Lewis Hill

Union City Rd

Notch Rd

Summer Rd

Prospect Rd

Scott Rd

Plank Rd

Waterbury Rd

Cuff Brook

Hamilton Ave

Frost Rd

Calvary Cemetery

Pine Grove Cemetery

Meriden Rd

Todd Rd

Central Ave

East St

Matine Rd

Wolcott St

N Main St

Hill St

Waterville St

Hurtington Ave

Bunker Hill Ave

Bunker Hill Rd

Middlebury Rd

Bunker Hill Rd

Woodlark Rd

Lyman Rd

Chestnut Hill

Lakewood Rd

Boyd St

Coke St

Foster Bridge Rd

Turkey Brook

French St

Marh St

Woodbury Rd

Sperry Hill

Compound Mountain

1041 ft

984 ft

959 ft

84

84

84

84

84

Steele Brook

Mad River

Bucks Hill

Bucks Hill Park

Lakewood Park

Fulton Park

Hamilton Park

Murray Park

Western Hills Golf Course

Country Club of Waterbury

Town Plot Hill

East Mountain Course

Farmington Hills Golf Club

Tame Buck Hill

Veteran's Memorial Park

Lakewood Park

Fulton Park

Hamilton Park

Murray Park

Western Hills Golf Course

Country Club of Waterbury

Town Plot Hill

East Mountain Course

Farmington Hills Golf Club

Tame Buck Hill

Veteran's Memorial Park

Lakewood Park

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(1) PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION

Target Area & Brownfields

a. Overview of Brownfield Challenges and Description of Target Area The City of Waterbury has a population of 114,900 and is ranked #12 out of 169 on the State of Connecticut's list of Distressed Municipalities. During the 19th and 20th centuries, the city housed many manufacturing companies which operated 3 shifts a day during WWI and WWII. The City experienced a sharp decline starting in the 1950s with the prominent use of plastic over brass, which was exacerbated during the 1970s with cheaper labor and newer technologies, all of which led to these former manufacturing sites closing and becoming blighted, tax delinquent brownfields left for the City to demolish and remediate. The City formerly had 29 brownfield sites, which currently is down to 20 brownfield sites, including the Freight Street District. In addition, 2 of the sites are in negotiations with a developer to complete remediation and redevelopment. The City, experiences funding challenges due to the large number of brownfield sites which require costly demolition and remediation in order to redevelop the sites. Once known as the "brass capital of the world" for over 100 years, the U.S. brass industry collapsed in the 1970s resulting in a severe economic downturn that continues to this day, along with blighted and abandoned factories on large brownfields, such as the former Anaconda-American Brass/Environmental Waste Resources (EWR) Target site (20.59-acres) within (Census Tract 3523) (Target Area). The Site is the most important redevelopment area (Freight Street District) in Waterbury. It is located in a federal Opportunity Zone (Tract #3501.01, and unlike most sites in Waterbury, it is flat and relatively large (20.59 acres). It is a key gateway to the City's downtown historic district. It is across the street from a train station (the "Train Station") serving both a passenger rail line (MetroNorth) and freight rail lines. The City recently joined the Connecticut Municipal Redevelopment Authority which can invest funds into transit-oriented district housing projects within a 1-mile walking distance of a train station. Accordingly, the Site is a perfect candidate for this program.

b. Description of the Proposed Brownfield Site(s): The Site consists of 3 contiguous parcels that once formed the Anaconda-American Brass and later EWR and Phoenix Soil complex (130 and 170 Freight Street, and 000 West Main Street). All 3 parcels are significantly contaminated from historical operations, listed on Connecticut Department of Energy & Environmental Protection (CT DEEP)'s Brownfield Inventory, and on the EPA's Watch List. EPA & CT DEEP have been engaged with these sites on several occasions following the bankruptcy of EWR. In 1998, DEEP removed approximately 1,000 containers of waste, a sludge pile, two 4,500-gallon tanks of acid & caustic liquids, and a combination of approximately 40,000 gallons of other liquid waste left behind by EWR. In 2016/2017, EPA removed an additional 27 tons of hazardous waste solids and 41,383 gallons of hazardous waste liquids. EPA also removed most of the former tanks, storage containers, accumulated non-hazardous debris, and liquids from their secondary containments. A property-specific determination has been received by EPA and CT DEEP. The Site had heavy industrial manufacturing from the 1840's-1977. At its peak, Anaconda-American produced two thirds of the nation's brass products. From 1977 to 1998, the Site housed a hazardous waste treatment, storage, and disposal facility. Phoenix soils continued operations until 2011, after which the Site became vacant. This funding request seeks to advance ongoing remediation activities. The City acquired 130 Freight & 000 West Main Street sites throughout tax foreclosure in 2020. In 2022, all remaining buildings on the 130 Freight Street parcel were demolished and in 2023, Building A (000 West Main Street) was demolished. In 2022, the City used American Rescue Plan Act (ARPA) funding to purchase the 170 Freight Street parcel (\$2.3M). The City matched the state funding with \$5M in ARPA funding, which has now been fully expended. These combined investments enabled the City to complete the demolition and debris removal of the 170 Freight Street Building down to slab. On December 26, 2024, CT DEEP issued a Stewardship Permit (No. DEEP/REM/SP/2024-14605/14606) covering both the 000 West Main and 130 Freight Street parcels. The permit requires the completion of environmental investigation, cleanup, and long-term stewardship obligations in accordance with Connecticut's Hazardous Waste Management

Regulations and the Remediation Standard Regulations (RSRs). In 2026, Waterbury Development Corporation (WDC) will remove the remaining slab at 170 Freight Street and conduct soil remediation beneath it using the Community Investment Fund (CIF) resources. WDC also plans to implement interim remediation activities at 130 Freight and 000 West Main Streets to address target areas of contamination (e.g., remaining underground storage tanks and Resource Conservation and Recovery Act (RCRA)-regulated unit secondary containment), supported by available trust funds (the “Trust Funds”) managed by CT DEEP which were established by settlement of an action against the prior site owner, ERW, and approved by the Superior Court. *See Amey W. Marrella, v. Eviron. Waste Resources, Inc.*, HHD-CV10-6007265S, Order granting Motion 119.00. Targeted areas have been further addressed using and Naugatuck Valley Council of Governments (NVCOG) cleanup grant funding. Significant contamination remains within 92 Areas of Concern (AOCs). The site has a sufficient level of Site Characterization from the foregoing assessments performed to date for the remediation work to begin on site as indicated in the attached Connecticut Department of Energy and Environmental Protection (CT DEEP) letter. Although interim remediation and slab removal efforts will eliminate some localized areas of contamination, significant cleanup needs will remain. The Site continues to exhibit elevated levels of volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), extractable total petroleum hydrocarbon (ETPH), and other pollutants associated with historical fill placement and Site operations, all of which must be remediated in accordance with the Stewardship Permit (130 Freight and 000 West Main) and the Connecticut Voluntary Remediation Program (VRP) (170 Freight). This grant will help further the remediation of the 20.59 acres of the Site located within the Freight Street District of the Central Business District (CBD), increasing public health and safety, promoting the socioeconomic welfare of the community residents, and providing future economic opportunity for the City.

Revitalization of the Target Area

c. Reuse Strategy and Alignment with Revitalization Plans:

The City’s Plan of Conservation and Development (POCD 2015-2025, updated draft in progress) will guide future redevelopment of the Site. The Site is intended for mixed-use, commercial and residential redevelopment. The Freight Street Redevelopment Strategy envisions, a streetscape pass-through connector bridge which would link the train station directly to the Freight Street corridor. Furthermore, the Regional POCD calls for transit-oriented development and improvements to the Waterbury train line, which are underway. Action items of the POCD’s Freight Street Redevelopment Strategy are the creation of mixed-income residential units each year (for 5-7 years) with restaurant, retail, commercial, and green spaces including the extension of the greenway and pocket green spaces. The POCD’s second goal is to preserve the City’s character and natural environment. The Site is close to natural resources like the Naugatuck River and the Waterbury Greenway. Due to proximity to the Naugatuck River, the entirety of the Site is located within FEMA’s 500-year flood zone, but is not located within 100-year flood zone nor Naugatuck’s Regulatory Floodway. Brownfields were listed as one of the top environmental challenges to the Naugatuck Valley Region. The State of Connecticut POCD (2025-2030) prioritizes brownfield remediation to revitalize struggling local economies, potentially providing housing resources, while providing stewardship of existing resources.

d. Outcomes and Benefits of Reuse Strategy: The City has some of the lowest median household incomes in the State. As of the 2024 American Community Survey (ACS), Median Household Income (MHI) for the City is \$47,881, less than 50% of Connecticut’s \$96,049 state-wide MHI. Any EPA funding dedicated to the cleanup efforts at the site will directly influence economic growth and create hundreds of long-term employment and housing opportunities for residents of the Target Area, the City, and for the region. New commercial development will attract businesses, increase local revenue, expand employment opportunities, and strengthen the City’s tax base. The Site is part of the CBD, surrounded by Freight Street & Jackson Street both of which already have updated utilities, with the West Main Street utilities currently being replaced. The Site is located adjacent to a federal Opportunity

Zone, within a State Enterprise Zone, and the new Municipal Redevelopment District, creating prime opportunities for redevelopment. Significant public investment into the Freight Street District has included demolition, remediation, utility upgrades, creating streetscapes, and upgrading the train line and train station in order to leverage private investment to the Site. Significant improvement of stormwater management is anticipated as part of site redevelopment that includes a plan to alleviate the West Main Street flooding due to an undersized storm system. The Freight Street Redevelopment Strategy also includes a fuel cell to utilize low-emission energy sources to enhance the resiliency of the electrical grid during storms and to meet future demands. The redevelopment is anticipated to utilize solar and green energy systems creating modern energy efficient building for their residents. The City recently met with the CT Municipal Redevelopment Authority, which has hired their own architect/engineer to evaluate the best development strategy for the Freight Street District. Recreational opportunities through the City's Raise Project will extend the greenway and green space, which are important components of the revitalization strategy for this project, intended to increase public health outcomes.

Strategy for Leveraging Resources

e. Resources needed for Site Characterization

Extensive environmental investigations have been conducted at this site with the most recent being Phase II and Phase III site assessments for 130 & 170 Freight Street and 000 West Main Street in 2024 and 2025. Although numerous AOCs and RCRA-regulated units are present across the Site, the current level of site characterization will allow for the design and implementation of targeted remedial actions that will support future redevelopment.

f. Resources Needed for Site Remediation:

While the funding requested under this grant will not be sufficient to complete remediation it is a vital piece of the overall funding strategy, and necessary to move the Site towards reuse. Funds requested under this grant will be used as part of a targeted remedial approach that seeks to excavate and remove hot spot areas of contamination that would otherwise be difficult or impossible to cap or achieve compliance with state/federal cleanup regulations by other means (e.g., regulatory exemptions and variances).

g. Resources Needed for Site Reuse:

Targeted remediation of areas of contamination that would hinder or prevent site redevelopment such as contamination that presents an unreasonable human health risk and/or areas that are costly to remediate (e.g., PCB contaminated media, VOC source areas, and hazardous waste level contamination). The recently issued Stewardship Permit (130 Freight and 000 West Main Street) will reduce regulatory uncertainty by providing a framework for compliance with federal and state environmental regulations and a means to manage long-term obligations. Once the site is substantially remediated, the City's intent would be to publicly advertise for a developer. The developer would be able to apply for funding through the new CT Municipal Redevelopment Authority.

Name of Resource	Resource Use	Secured or Unsecured?	Additional Details or Information About the Resource
CT DECD - Community Investment Fund	Remediation	Secured	\$10,000,000 available for remediation at all three sites.
NVCOG EPA RLF Funding (2023)	Remediation Monitoring	Secured	\$350,000 is available for remedial design and oversight services

NVCOG EPA Brownfield Cleanup RLF Funding (2025)	Remediation	Secured	\$500,000 is available to use towards 000 W Main St for remediation
DEEP Trust Funds	Remediation	Secured	\$1,000,000 is available to use towards interim remediation and oversight services

h. Use of Existing Infrastructure: The City is located at the crossroads of Interstate 84 & Connecticut Route 8. The City is home to a passenger rail station and bus terminal. Metro North operates passenger rail with commercial rail freight servicing the area. Freight and Jackson Street just underwent a complete overhaul, with the City utilizing funds from a \$14M federal TIGER grant, followed by a \$23.1M RAISE Grant, allowing for the modernization of all storm and sanitary sewers, larger diameter water main, new sidewalks, for all modes of transportation. This Site is perfectly positioned for an end-user or developer and the Freight Street District can accommodate future expansion because of the improvements made to utilities and streetscape. Water, sewer, gas, electricity, high-speed internet, and phone service is available at the Site. The Site is located 0.3 miles from the City's train station, making this Site the focus of transit-oriented redevelopment.

(2) COMMUNITY NEED AND COMMUNITY ENGAGEMENT

Community Need

a. The Community's Need for Funding: The City is disproportionately impacted by economic burdens and environmental hazards, including dozens of brownfield sites. These challenges not only create hardships for its sensitive populations, but also significantly constrains the City's ability to secure adequate remediation funding to alleviate environmental and health risks at all these sites. Approximately 26% of the City is below the poverty line according to the American Community Survey. Without this EPA cleanup funding, remediation and redevelopment at this Site could not proceed any further. Given the size of the Site and the extent of contamination, multiple funding sources will be required. This EPA Grant would leverage \$11,850,000 invested into in the Freight Street District Redevelopment Project, enabling the City to fully complete remediation of the entire 20.59-acres and bring the Site back to the community.

b. Health or Welfare of Sensitive Populations: Several vulnerable populations live within .25 miles of the Site. This census tract has a population over the age of 64 (10%) and 22.8% of the population is under the age of 19 within a low-income community (30.2%). The population with less than a high school diploma in this area is 13.4%. According to the ACS 5 Year Estimates, census tract 3523 had an unemployment rate of 11.7% compared to the City's unemployment rate of 9.6% and the State's unemployment rate of 6% (2019). SNAP recipients in Waterbury are 31.55% compared to 11.9% in Connecticut (CTData.Org). As of 2024, the percentage of Waterbury residents without health insurance remains higher than the state average. In 2021, approximately 8.4% of Waterbury's population was uninsured, while Connecticut's state average was about 5.9% during the same period. The higher uninsured rate can be partly attributed to factors like income disparities, as well as, other socioeconomic challenges that affect access to health coverage. This grant will help address and reduce to health risks and environmental hazards currently impacting Waterbury. The remediation and ultimate redevelopment of the site will benefit those that live within the neighborhood through updated housing, commercial/retail opportunities, and providing more greenspace options while removing the threat of living near a contaminated site.

c. Greater Than Normal Incidence of Disease and Adverse Health Conditions: According to a five-year estimate from 2023, Waterbury scored 10/10 risk level for childhood lead exposure risk indicating both that the age of housing presents risks, as well as the daily exposure to lead dust in the environment, compounded by poverty levels in the community. According to the 2023 Lead Surveillance Report by DPH, Waterbury has the third highest number of lead poisonings in the State. In 2023, Waterbury

providers screened 3677 children, of whom 185 has a blood lead level above 3.5 µg/dL, 118 had a level above 5 and 31 had a level higher than 10. In addition, poor birth outcomes are prevalent in Waterbury, including a low-birth-weight rate of 10.8% and an infant mortality rate of 5.3 per 1000 live births as compared to the state rate of 4.7. Waterbury had an estimated 35.1% of adults report high blood pressure in 2021, compared to an average of 32% for Connecticut. According to the 2024 CDC update, census tract 3523 has an asthma rate of 12.4% compared to 10.8% in CT and 10.6% national average. These health outcomes could be associated with the contaminants and pollutants present at the site and other properties throughout Waterbury, creating a sense of urgency to secure funding for remediation and cleanup. This grant will help to provide residents with cleaner land and air, improving public health and overall quality of life for the Freight St. District.

d. Economically Impoverished/Disproportionately Impacted Populations: The Freight Street District has an unemployment rate of 11.7% with an economically impoverished and disproportionately impacted population. This EPA cleanup request for funding directly aligns with this goal, as it would continue to fund remediation of hazardous waste and remove contaminants from 20.59-acres of land, which can then be redeveloped so that housing and commercial/retail jobs can be created, which will allow for the residents to have nearby employment and services. The Freight Street District, census tract 3523, would most benefit from these funds as vulnerable and disproportionately impacted populations live in the target area. These cleanup and subsequent redevelopment efforts would promote grand list growth, spurring business activity, and creating job growth in the Corridor.

Community Engagement

e. and f. Project Involvement & Project Roles.

The list below includes our project partners, contact information and their role in the project. All partners will have a meaningful and individualized role in the project, as well as, extensive involvement in the decision-making process in regards to Site cleanup and future reuse plans.

- City of Waterbury-Entity's Mission-Remediation and redevelopment for the benefit of the community; Michael LeBlanc, Director of Finance, mleblanc@waterburyct.org, 203-574-6840 - Applicant and Property Owner
- Waterbury Development Corporation - Entity's Mission- Manage projects and economic development on behalf of the City of Waterbury; James Nardozi, Executive Director, nardozi@wdconline.org, 203-346-2607 ext.7283 - Project Management Entity for Freight Street Corridor
- Connecticut Department of Economic and Community Development - Entity's Mission- The agency takes a comprehensive approach to economic development that incorporates community development, transportation, education, and arts and culture; Binu Chandy, Director of the Office of Brownfield Remediation & Development, bindu.chandy@ct.gov, (860)-500-2454 & Melinda Wilson, Director, Office of Community Development and Community Investment Fund 2030 – Financial Assistance
- Naugatuck Valley Council of Governments - Entity's Mission- Provides a regional framework within which municipalities can jointly address common interests, and coordinate such interests with state and federal plans and programs. Rick Dunne, Executive Director; rdunne@nvcogct.gov, 203-489-0513 - Administers EPA RLF Grants and provides transportation planning assistance.
- Environmental Protection Agency – Entity's Mission- To protect human health and the environment; EPA Region 1 (New England) 5 Post Office Square - Suite 100 Boston, MA 01209 - Financial Assistance RLF Funding (Above)

- Waterbury Neighborhood Council-Entity's Mission-The Waterbury Neighborhood Council strives to encourage citizen involvement in neighborhood and city-wide issues, strengthen existing neighborhood organizations, and foster the creation of new ones. Arthur Denze, Sr.; President (203)-755-5761- Will be invited to participate in community meetings. Represents the various and active neighborhood groups.
- Waterbury Regional Chamber of Commerce – Entity's Mission- The Waterbury Regional Chamber is dedicated to strengthening the regional economy by serving its members as a network, resource and advocate. Lynn Ward, CEO & President lward@waterburychamber.com, 203-757-0701 - Will be invited to participate in community meetings. Represents the business community.
- The Hispanic Coalition of Greater Waterbury – Entity's Mission- To emphasize the importance of advocacy, collaboration, and education to enhance the quality of life for Hispanic families and the diverse population of the City of Waterbury. Victor Lopez, Executive Director vlopez@thehispaniccoalition.org - Will be invited to participate in community meetings. Represents the large Hispanic population within the City.
- Main Street Waterbury – Entity's Mission- To advocate, educate, and collaborate for the revitalization and enhancement of downtown Waterbury following the Main Street Four-Point Approach. Dan Pesce, Director, dpesce@waterburychamber.com, (203)-757-0701 - Will be invited to participate in community meetings. Represents the CBD.
- Northwest Regional Workforce Investment Board – Entity's Mission- To foster economic vitality and prosperity in Northwest Connecticut. Through strategic partnerships, tailored to programs, and innovative initiatives, we aim to equip individuals with the skills they need to succeed in the region's evolving job market. Catherine Awwad, Executive Director catherine.awwad@nrwib.org, (203)-574-6971 - Will be invited to participate in community meetings. Represents manufacturing, and job training.

g. Incorporating Community Input: The City has been collaborating with various community organizations, including Neighborhood Councils and Associations, the two large hospitals (Waterbury and Saint Mary's), major universities (UConn Waterbury, Post University, Naugatuck Valley Community College), public and private schools, financial institutions and foundations, and more throughout the planning and demolition phases of the project. The City will continue to communicate project progress to the local community by way of city websites, social media and the local newspapers (the daily Republican American newspaper and Hartford Business Journal), as well as, public meetings and community events. Any public meetings will be hybrid to increase accessibility and offer an alternative to in-person engagement, with a translator available. Input from the community will be gathered through public visioning sessions to obtain feedback for final site reuse. Residents and stakeholders will have ample opportunities to share comments and ask questions regarding the site via public commentary periods as well as online options (social media, email, etc.) Community input will be considered as part of the decision-making process and used to guide reuse plans. All comments will be responded to at the end of any public commentary period. WDC will hold 2 community meetings a year, providing updates on the site to the public.

(3) TASKS DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS

a. Proposed Cleanup Plan: Site characterization has identified a widespread fill layer made up of ash, coal, brick, concrete, and metal, ranging from 0.5 to 15.6 feet thick. This fill is present beneath a majority of the Site and contains elevated levels of PAHs and metals above RSR criteria at nearly all sampling locations. Releases of VOCs, SVOCs, ETPH, PCBs, and metals to soil have been identified at numerous RCRA-regulated units (HWMUs/SWMUs) and/or AOCs and several large, comingled soil release areas are present with elevated concentrations of site COCs (VOCs, SVOCs, ETPH, metals,

and PCBs) above RSR criteria. Many of these releases are comingled and in some cases, span multiple parcels. Groundwater quality across the Site is severely degraded, with measurable light, non-aqueous phase liquids (LNAPL) and VOCs, SVOCs, ETPH, and metals above RSR criteria in most monitoring wells. Contaminated groundwater is migrating, or has the potential to migrate off-site, to adjacent properties. Investigations at 170 Freight Street confirm that groundwater contamination from 130 Freight Street is moving downgradient. Petroleum and hazardous constituents have also been detected at property boundaries shared with 250 Freight Street, suggesting off-site migration of contaminants from the site. The proposed cleanup plan to be funded by this grant includes targeted remediation of contaminant source areas. Specifically, areas of soil contaminated by releases of PCBs, VOCs, and petroleum at elevated concentrations. These releases have occurred into the widespread polluted fill observed throughout the Site. Areas targeted for soil remediation (excavation and off-site disposal) include areas which present challenges to redevelopment such as: soil impacted with Toxic Substances Control Act (TSCA) regulated PCBs, soil concentrations in excess of RCRA hazardous waste levels, and VOC source areas that present a volatilization hazard. These areas are subject to complex regulatory requirements, and the cost to remediate each area is expensive due to the contaminant concentrations (e.g. transport/disposal). This proposed cleanup plan is part of a more comprehensive remedial approach that will ultimately include several regulatory mechanisms to achieve compliance with the RSRs (e.g., engineer controls, soil capping, and environmental use restrictions). This proposed cleanup plan is consistent with the conceptual Remedial Action Plan (RAP) developed for 170 Freight Street and the conceptual RAP (currently under development) for 130 Freight and 000 West Main Street.

Description of Tasks/Activities and Outputs

Task/Activity 1 – Program Management

b. Project Implementation

EPA funded tasks/activities - Meetings and consulting services for project coordination.

Non-EPA Grant Resources Needed - WDC staff will provide project management and oversee the agreement including tracking project progress. Procurement of qualified environmental professional (QEP) and contractors and coordination/meetings with project partners.

c. Anticipated Project Schedule - (Months 1-24) QEP procurement within 90 days of NTP

d. Task/Activity Lead - WDC is the Task Lead. WDC staff time will not be charged to this grant.

e. Outputs - QEP procurement; project kickoff meeting and periodic status meetings (meeting minutes).

Task/Activity 2 – Community Outreach & Engagement

b. Project Implementation

EPA funded tasks/activities - QEP lead or attended public meetings. QEP will revise the Community Involvement Plan based on community feedback.

Non-EPA Grant Resources Needed - WDC will lead with support from the QEP for community engagement in the decision-making process. Public meetings will be conducted to inform the community and solicit public input.

c. Anticipated Project Schedule - (Months 1-24) Activities will begin within 30 days of NTP; public meetings; continuous engagement outreach.

d. Task/Activity Lead - WDC is the Task Lead. WDC staff time will not be charged to this grant.

e. Outputs - Community Involvement Plan (revisions), outreach materials; newspaper articles (Republican-American); social media updates (WDC website, Facebook, LinkedIn, YouTube); meeting presentations; public meetings; meeting minutes; sign-in sheets; public comments; visible signage.

Task/Activity 3 – Cleanup Planning

b. Project Implementation

EPA funded tasks/activities - Documents for cleanup implementation, including updating the site-specific Quality Assurance Project Protocol (QAPP), preparing an EPA PCB Workplan, design

technical specifications, preparing bid documents, and providing bid assistance. Acquisition of any necessary permits from City or CT DEEP. The QEP will oversee the completion of these activities for the project.

Non-EPA Grant Resources Needed - WDC will solicit bids and select and procure a remediation contractor and oversee the QEP activities.

c. Anticipated Project Schedule - QAPP updates (months 1-3); EPA PCB Workplan (months 3-9); bid documents (months 6-9); permitting and approvals (months 9-12).

d. Task/Activity Lead - QEP with coordination and oversight from WDC.

e. Outputs - Revised QAPP. EPA approved PCB Workplan. Technical specifications, drawings, and bid documents. Applicable permit approvals. Procurement of remediation contractor.

Task/Activity 4 – Cleanup Activities

b. Project Implementation

EPA funded tasks/activities - QEP will oversee remedial activities as outlined in the previously prepared ABCA (removal of “hot spot” contaminated soils impacted with co-mingled releases of VOCs, PCBs, and petroleum into historical fill) to be performed by a licensed remediation contractor. Cleanup activities to include: site preparation, excavation, soil testing, transportation, and disposal; backfill and site restoration; soil remediation oversight, and data evaluation. Cleanup activities will be overseen by the QEP (including a Connecticut Licensed Environmental Professional (LEP)).

Non-EPA Grant Resources Needed - WDC will oversee progress and QEP activities.

c. Anticipated Project Schedule - Cleanup activities will include hot spot excavation of soil from the Target Site (months 12 to 36)

d. Task/Activity Lead - QEP with coordination and oversight from WDC.

e. Outputs - Remedial Action Report (description of remedial activities, summary of materials moved, figures depicting excavation extents and sample locations, summary and discussion of sample results, disposal documentation)

f. Cost Estimates: This budget was developed using estimates from a QEP and based on similar brownfield remediation projects completed in the past.

Task 1: Program Management: \$16,800 = 112 hours Engineer/Administrator average rate - \$150/hr. avg. WDC staff hours will not be charged to the grant.

Task 2: Community Outreach & Engagement: = \$9,440 (Facilitator: 2 meetings/year x 2 years x 8 hrs. at \$220/hr. and 2 meetings/year x 2 years x 8 hrs. at @150/hr. [\$7,040]; Community Involvement Plan Updates [\$2,400]). WDC staff time will not be charged to this grant.

Task 3: Cleanup Planning: Soil Remediation = \$45,500 (update QAPP [\$2,500]; prepare bid documents [\$18,000]); prepare EPA PCB Workplan and Management [\$25,500]).

Task 4: Cleanup Activities: Contractual – Soil Remediation = \$439,600 (soil remediation oversight [\$91,000 = \$1,300/day @ 70 days approx. based on an excavation volume of 120 tons/day approx.]; air monitoring [\$24,500 = \$1,750/week @ 14 weeks approx.]; laboratory analysis for PCB verification sampling [\$108,000 = 1,800 samples @ \$60/sample approx.]; laboratory analysis of post-excavation confirmatory soil samples [\$70,000 = 140 samples @ \$500]; laboratory analysis of waste characterization soil samples [\$28,800 = 24 samples @ \$1,200]; sampling equipment and mileage [\$24,500 = \$350/day @ 70 days]; project oversight and data evaluation [\$52,800 = 240 hrs. @ \$220/hr. approx.], Remedial Action Report [\$40,000]). **Construction – Soil Remediation = \$3,488,005** (excavate/transport/disposal TSCA regulated & RCRA Hazardous soils [\$558,000 = 1,000 tons @ \$550/ton approx.]; (excavate/transport/disposal TSCA regulated & non-RCRA Hazardous soils [\$1,329,861 = 3,472 tons approx. @ \$375/ton approx.]; (excavate/transport/disposal RCRA Hazardous soils [\$1,231,388 = 3,788 tons @ \$325/ton approx.]; backfill [\$330,444 = 5,507 cubic yards approx. @ \$60/cubic yard avg.]; site preparation/dust control/fencing/equipment decontamination [\$8,000]).

TOTAL FEDERAL (Direct + Indirect) = \$3,999,345

g. Plan to Measure and Evaluate Environmental Results:

WDC, with assistance from its QEP will monitor and measure progress. WDC uses Microsoft Project to track schedules along with quarterly reports that will be used to track schedule, expenses, compliance with Davis Bacon and Build America Buy America Act, including the local hiring requirements which is monitored through the Northwest Workforce Regional Investment Bureau and tracked using certified payrolls. Data will be tracked using Microsoft Project, the 16 quarterly reports to Acres documenting the important bidding and contract milestones. The contractor will be required to submit a detailed schedule and remediation work plan which will be used to track project milestones and progress. The output will include a Remedial Action Report (RAR) prepared by the QEP documenting the cleanup activities. This information will be utilized to meet federal and state regulatory requirements, and support future site development within the Freight Street District.

(4) PROGRAMATIC CAPABILITY AND PAST PERFORMANCE

Programmatic Capability

a. Organizational Structure & b. Description of Key Staff: The applicant for this project is the City. WDC, acting through the PAL pursuant to the MMA with the City will serve as Project Manager, overseeing the timeline and budget, as well as, overseeing all contractors. Paul K. Pernerewski, Jr., Esq, served as a member of the city council, then as council president for 14 years prior to being elected as Mayor of the City of Waterbury in 2023. Ms. Mansi Doshi, a Civil Environmental Engineer, is a WDC project manager assigned to the demolition, debris removal, and remediation of this complex. She has successfully overseen the demolition of 8 buildings on the 130 Freight Street parcel in 2021, the demolition of the 170 Freight Street Buildings, and is intimately familiar with the Site. Mansi will use Microsoft project to tract the milestones and schedule of the contractor, which will help when reporting quarterly in Acres. Mansi will be supervised by Ronald Cassella, V.P. of Construction at WDC. Ron has over 40 years industry experience. Zachary Keith, Economic Development and Grants Manager, has been with WDC for 8.5 years, submit the grant and work with the City's Finance Director Michael LeBlanc and his staff on grant requirements and drawdowns. Dr. James Nardozi, Executive Director of WDC, will lead site redevelopment. The WDC will publicly advertise for contractors for remediation, on behalf of the City, invoices and manifests will be reviewed and processed by WDC Staff and submitted to the City Finance Director Michael Leblanc for payment to the contractor. WDC will also work with QEPs, and the City's Finance department on grant drawdowns, reporting to ACRES. The City and WDC have the experience necessary to manage federal grants.

c. Acquiring Additional Resources:

The City & WDC have, for decades, completed many Federal and State funded projects. The City and WDC are intimately familiar with the procurement guidelines of the EPA and will advertise public competitive bids for contractors according to those guidelines. WDC is well versed in both ITB and RFP processes. WDC will publicly advertise and contract with a QEP to prepare remediation specifications and provide remediation oversight. WDC will publicly advertise for the lowest qualified bidder to be selected during the contracting and interviewing phase to perform the remediation. The City and WDC will work closely with CT DEEP to ensure all necessary permits are acquired. All cleanup plans will be forwarded to the appropriate departments at the local, State, and Federal levels as the project progresses. The entire project Site is enrolled in Connecticut's Voluntary Remediation Program. On December 26, 2024, CT DEEP issued a Stewardship Permit (No. DEEP/REM/SP/2024-14605/14606) covering both the 000 West Main and 130 Freight Street parcels. Compliance with these programs will be monitored by WDC and the QEP.

Past Performance and Accomplishments

d. Currently has or Previously Received an EPA Brownfields Grant

(1) Accomplishments - In 2016, the EPA awarded an Assessment Grant (#BF96168301) to WDC to assess building materials and ASTs in advance of building demolition at 130 Freight St and 000 West

Main St. The grant funds were completely expended on time and within budget, with all outputs being achieved. In 2022, the City received EPA funds under cooperative agreement (#4B00A00829) with a grant period of July 1, 2022-September 30, 2025 for assessment, specifications, bidding, and demolition monitoring services at 835 South Main Street. WDC managed this project on behalf of the City, the services were completed including all quarterly reports to Acres, and the grant was closed out on August 26, 2025. In 2022, the City also received a \$1 million EPA grant agreement (#00A01420) with a grant duration of July 1, 2023-September 30, 2027. WDC is managing this project for the remediation at 777 South Main Street on behalf of the City and the remediation will begin this year and all quarterly reporting reports are being completed. When applicable, ACRES Property Profiles for each site have been updated with milestones.

(2) Compliance with Grant Requirements – The City and WDC have remained in compliance with all grant conditions and reporting requirements for BF96168301; 4B00A00829; and 00A01420. All required updated have been submitted to Acres documenting progress with the grant and overall projects. The City and WDC have not had any grants rescinded due to non-compliance. Neither the City nor WDC have been the subject of any disbarment notice.



Threshold Criteria Responses

1. Applicant Eligibility The City of Waterbury (COW) is a General-Purpose Unit of Local Government (City) & as such is an organization that is eligible to receive Federal EPA Cleanup Funding. The Waterbury Development Corporation (WDC) manages the Freight Street Project on behalf of the COW pursuant to a project specific Project Authorization Letter (PAL) which is subject to a Master Municipal Agreement (MMA) between the COW & WDC.

2. Previously Awarded Cleanup Grants The proposed former Anaconda-American Brass/EWR Site has not received funding from a previously awarded EPA Brownfield Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds The COW does not have an open EPA Brownfields Multipurpose Grant for these sites.

4. Site Ownership The COW is the sole owner of 130 Freight, 170 Freight, and 000 West Main Streets. The COW took ownership of the 130 Freight Street/000 West Main Street parcels in 2020 through foreclosure & purchased (warranty deed) the 170 Freight Street Parcel in 2022.

5. Basic Site Information a) Name of the Site: Former Anaconda-American Brass/EWR Site b) Address: 130 Freight Street (map block lot# 0272-0022-0024), 000 West Main Street (map block lot# 0272-0022-0022), & 170 Freight Street (map block lot# 0272-0022-0021), Waterbury, CT 06702 c) Current Owner: The COW (Applicant).

6. Status and History of Contamination at the Site a) The site is contaminated by hazardous substances & incidental petroleum impacts, the majority of the contaminants being hazardous substances. b) From the 1850's-1970's, the site was home to the Waterbury Brass Company and its successors the American Brass Company and Anaconda American Brass. From 1977-1998, the site housed a hazardous waste treatment, storage, and disposal companies named Environmental Waste Resources & Phoenix Soils, which was a Connecticut regulated waste treatment and soil remediation facility. Phoenix soils continued operations on the 130 Freight Street parcel until 2011, at which time the site became vacant. c) The site is contaminated with high levels of PCBs, VOCs, SVOCs, PAHs, and ETPH pollutants (among other select metals & contaminants). d) Due to the site's long industrial use, it is difficult to identify a single "potentially responsible party" for the contamination, but the contamination likely happened during the late 19th & early 20th centuries. At the 130 Freight and 000 West Main Streets sites, there are 62 AOCs and some of these contaminants exceeded the applicable CT RSR criteria. LNAPL was identified in 6 wells and groundwater samples indicated presence of VOCs, SVOCs, PCBs, cyanide, & dissolved RSR 15 metals constituents. The current interim remediation scope includes identification and verification of any underground storage tanks (USTs) present on-site. Should the contractor locate USTs, their removal and proper disposal will be executed as part of this ongoing project, utilizing available Trust Funds and the NVCOG RLF Cleanup Grant. At 170 Freight Street, QEP firm Tighe & Bond identified 30 on-site AOCs & 1 off-site AOC where COCs may have been spilled or released. Many of the AOCs identified have multiple locations and fall within the footprint of the former buildings. Accessible AOCs were investigated by collecting concrete, soil, and/or groundwater samples to determine whether releases of regulated compounds have occurred. COCs included: VOCs, SVOCs/PAHs, ETPH, PCBs, and metals based upon former site industrial/manufacturing operations, the historical placement of fill material, & the potential on-site migration of off-site contamination. The COCs identified in concrete include VOCs, ETPH, and PCBs. The COCs identified in soil include VOCs, SVOCs/PAHs, PCBs, & metals. Concentrations of VOCs, SVOCs, ETPH, & metals were detected in groundwater. Significant progress is expected at all sites once interim remediation is completed, including the removal of building slabs and underlying soils. However, residual

contamination will remain across the sites, & additional comprehensive remediation activities will be required to achieve full regulatory compliance and site readiness for redevelopment.

7. Brownfields Site Definition a) The site is not listed or proposed for listing on the National Priorities List. b) The site is 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. c) The site is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications Below is a list of previous environmental assessments conducted that are applicable to this application.

130 Freight / 000 West Main Streets - Phase I ESA, TRC Companies, October 2017; Limited Phase II Investigation, TRC Companies, March 2019; Soil Sampling Report for PCB Content, TRC Companies, August 2020; Hazardous Building Materials Assessment - August 2022; EWR, Inc.(former), COW – Final Stewardship Application with Attachments, December 2024; Site Characterization Report, August 2025. 170 Freight Street - Phase I ESA, Tighe & Bond, June 2022; Hazardous Building Materials Assessment, Tighe & Bond, March 2023; Phase II/III ESA, Tighe & Bond, March 2024; Quality Assurance Project Plan (QAPP), October 2024; Slab Assessment Work, June 2025; Slab Demolition Design, September 2025; PCB Clean-up Plan, November 2025.

9. Site Characterization Per previous environmental investigations, site shall be remediated under Connecticut's Voluntary Remediation Program, resulting in compliance with the RSRs due to the presence of soil & groundwater impacts observed that exceed applicable Remediation Standard Regulations (RSRs). All 3 addresses are contiguous & part of the same complex & enrolled into a Voluntary Remediation Program for compliance with State remediation standards. 130 & 170 Freight Street are identified on EPA RCRA database whereas all 3 sites are part of CT DECD Brownfield Project's database.

10. Enforcement or Other Actions *130 Freight /000 West Main Streets:* Enforcement: The Site entered into the 22a-133x Voluntary Remediation Program on February 1, 2021 & the COW intends to investigate & remediate the properties in accordance with state & federal requirements including the Remediation Standard Regulations (the "RSR"s), the Resource Conservation & Recovery Act ("RCRA") & the Toxic Substances Control Act ("TSCA"). Other Actions: CTDEEP facilitated limited removal and relocation of wastes from the Site in 1998, but was unable to remove all of the wastes present nor decontaminate certain areas. In 2016 & 2017, the USEPA conducted an emergency removal action to address remaining materials, as well as, accumulated materials on both properties. Many tanks were removed and berms dismantled as part of this action. Reportedly, 8 Solid Waste Management Units. (SWMUs) units regulated under RCRA were located on Site and were part of Site Characterization report. The Site has a complex regulatory and enforcement history, including prior investigations, combined enforcement actions, and extensive site characterization efforts. (Detailed regulatory history, of site characterization in the environmental reports). *170 Freight Street:* Enforcement: The Site was accepted into the Abandoned Brownfield Cleanup (ABC) Program on October 21, 2022. Acceptance into this program requires that remediation of the property occurs in accordance with CGS Section 32-768(f). The COW must enter & remain in the Voluntary Remediation Program (VRP), CGS Section 22a-133x, until the property is remediated pursuant to regulations set forth at Section 22a-133k-1 to -3 to the standards in the RSRs. An environmental condition & assessment form (ECAAF) & transmittal form for the Site's enrollment into the Voluntary Remediation Program was prepared by Tighe & Bond & submitted to CTDEEP on March 21, 2023. An Acknowledgement of Receipt of an ECAAF & Fee Waiver Request was sent December 29, 2023.

Other Actions: The hazardous building materials abatement & demolition project whereby each building was demolished to ground elevation, leaving basement slabs and foundations in place (Buildings 1, 2, and 3). Floor Slabs & potential basements (underneath Building 1 & 3) are anticipated to have contamination by waste materials & are undergoing supplemental site characterization. The impacted concrete slabs were assessed & will be removed under the current contract with Manafort.

11. Sites Requiring a Property Specific Determination Please see the attached Property Specific Determination dated November 26, 2024 for these sites.

12. Threshold Criteria Related to CERCLA/Petroleum Liability a. Property Ownership Eligibility Hazardous Substance Sites

- i) Exemptions to CERCLA Liability
- 3) Property Acquired Under Certain Circumstances by Units of State & Local Government

A & b)

130 Freight /000 West Main Streets: The COW acquired both parcels through foreclosure as a result of tax delinquency. The COW foreclosed on 130 Freight Street parcel 10/21/2020 & 000 West Main Street on 12/31/2020. The certificates of foreclosure for both parcels cites “liens for unpaid real estate taxes, water charges, & sewer charges due to the COW.” The COW foreclosed on 130 Freight Street from Ridan Enterprises Inc. FKA D’Addario Enterprises & on 000 West Main Street from Environmental Waste Resources Incorporated FKA Environmental Waste Removal, Inc. The COW did not cause or contribute to the contamination. WDC on behalf of the COW oversaw the demolition & debris removal & subsequent soil and slab testing.

170 Freight Street: The COW purchased this parcel on December 20, 2022 for \$2,300,000 through a Warranty Sale through ARPA Entitlement funding. The COW did not cause or contribute to the contamination. WDC on behalf of the COW oversaw the demolition & debris removal and subsequent soil & slab testing. c) The disposal of all hazardous substances at these sites occurred prior to the COW acquisition of these parcels. d) The COW has not caused or contributed to any release of hazardous substances at this site. e) The COW has not, at any time, arranged for the disposal of hazardous substances at the site or transported hazardous substances to the site.

13. Cleanup Authority and Oversight Structure a) WDC will manage the project site on behalf of the COW pursuant to the PAL which is subject to the (MMA) between the COW & the WDC. The PAL & the MMA are the vehicles which allow WDC to manage projects on behalf of the COW. WDC on behalf of the COW has enrolled all 3 sites (130 Freight, 170 Freight, & 000 West Main Streets) into CTDEEP’s Voluntary Remediation Program commence to ensure compliance with CT RSRs. WDC will publicly advertise for a QEP to prepare remediation specifications and provide oversight. WDC will then publicly advertise for a remediation contractor, the selected contractor will be responsible for ensuring all local, state, & federal health & safety regulations are met. The selected QEP will also responsible for satisfying the COW’s RFQ, & any Change Orders issued by the COW after the execution of the binding contract between the QEP & WDC. All applicable federal & state laws will be complied with to ensure this project protects human health and the environment. The contractor selected to perform the scope of work related to this project will be chosen through a fair, transparent hiring process outlined in the COW’s Code of Ordinances.; b) The COW & WDC are working diligently to ensure that community stakeholders are engaged in the planning phase and will continue such efforts during demolition & remediation. No neighboring properties will need to be accessed in order to perform the necessary cleanup activities.

14. Community Notification

- a) Analysis of Brownfield Cleanup Alternatives
Please see the attached ABCA

b) Community Notification Ad-Republican American Newspaper-January 2, 2026. Dated images of the community notification from the WDC Website, LinkedIn, and Facebook Pages, and City Website and Facebook pages.

c) Public Meeting: Held on January 8, 2026 5:30-7:30 pm in the Cass Gilbert Room of City Hall 235 Grand St. The city did not receive any public comments and no members of the public attended(see attached sign in sheet).

d) Submission of Community Notification Documents. The following documents are attached to this application: A copy of the ABCA; Republican American Newspaper, A dated image of community notification from the WDC website & LinkedIn/Facebook page, the City website and Facebook page; and the sign in sheet from the public meeting. The city did not receive any public comments or participants at the zoom meeting.

15. Named Contractors and Subrecipients

Contractors: N/A, Not Named

Subrecipients: N/A, Not Named



December 1, 2025

Zachary Keith
Economic Development & Grants Manager
Waterbury Development Corporation
83 Bank Street
Waterbury, CT 06702

Re: State Acknowledgement Letter for EPA Brownfields Cleanup Grant for FY26

Dear Mr. Keith:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the City of Waterbury intends to apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2026. The City of Waterbury has developed an application requesting site-specific federal Brownfields Cleanup funding for the Freight Street Corridor, including 170 Freight Street, 130 Freight Street, and 000 West Main Street, in Waterbury, CT (the Sites).

Cleanup work funded by an EPA grant must be performed in one of Connecticut's formal remediation programs, including but not limited to the Voluntary Remediation Program pursuant to CGS §22a-133x. The Sites are each currently enrolled in the Voluntary Remediation Program.

DEEP acknowledges that the following Environmental Investigations and Reports have been completed at the Sites:

130 Freight Street/000 West Main Street:

- Phase I ESA, TRC Companies, October 2017
- Limited Phase II Investigation, TRC Companies, March 2019
- Soil Sampling Report for PCB Content, TRC Companies, August 2020
- Hazardous Building Materials Assessment - August 2022
- EWR, Inc. (former), City of Waterbury – Final Stewardship Application with Attachments, December 2024
- Site Characterization Report, August 2025

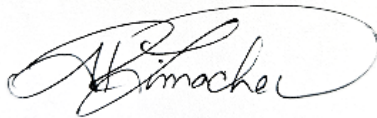
170 Freight Street:

- Phase I ESA, Tighe & Bond, June 2022
- Hazardous Building Materials Assessment, Tighe & Bond, March 2023
- Phase II/III ESA, Tighe & Bond, March 2024
- Quality Assurance Project Plan (QAPP), October 2024
- Slab Assessment Work, June 2025
- Slab Demolition Design, September 2025
- PCB Clean-up Plan, November 2025

DEEP concludes, based upon the environmental site assessments performed to date and information provided by the applicant, that a sufficient level of site characterization has been performed for remediation work to begin at the Sites.

If you have any questions about this letter, please contact me at (860) 424-3351 or by e-mail at Amanda.Limacher@ct.gov. Good luck with your application.

Sincerely,

A handwritten signature in black ink, appearing to read "A. Limacher", enclosed in a light gray oval shape.

Amanda Limacher
Brownfields Coordinator

c: Ms. Katy Deng, EPA (via e-mail)