Julia Pemberton
First Selectwoman
Office: 203-938-2002

Town Hall
100 Hill Road
Redding, CT 06896

Narrative Information Sheet
U.S. EPA Brownfield Cleanup Grant Application

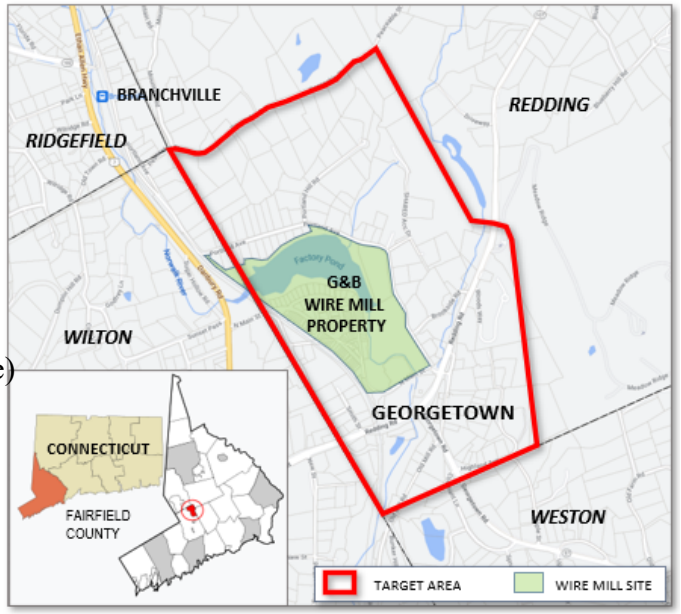
1. Applicant Identification
   Town of Redding Connecticut
   100 Hill Road, P.O. Box 1028
   Redding, CT 06875

2. Website URL:
   a. Town: https://reddingct.gov/
   b. Revitalize Georgetown: https://reddingct.gov/revitalize-georgetown-project/

3. Funding Requested
   a. Grant Type = Single Site Cleanup
   b. Federal Funds Requested = $4,000,000

4. Location
   a) Town of Redding
   b) Georgetown (Census-Designated Place)
   c) Fairfield County
   d) Connecticut

5. Property Information
   Gilbert & Bennett Wire Mill Manufacturing Site
   30 North Main St. (Weaving Parcel = primary site)
   Redding, CT 06896



AREA LOCATION, TARGET AREA AND SITE

6. Contacts
   a. Project Director
      Julia Pemberton
      First Selectwoman
      Town of Redding Connecticut
      100 Hill Road, P.O. Box 1028, Redding, CT 06875
      203-938-2002 (ext. 1)
      jpemberton@reddingct.gov

   b. Chief Executive/Highest Ranking Elected Official
      Julia Pemberton, First Selectwoman
      Town of Redding Connecticut
      100 Hill Road, P.O. Box 1028, Redding, CT 06875

203-938-2002 (ext. 1)
jpemberton@reddingct.gov

7. Population
8,765 (2020 U.S. Census); 8,830 (2025 U.S. Census projection)

8. Other Factors Checklist

Other Factors	Yes/No	Page #
Community Population is 10,000 or less	Yes	1, 4
The applicant is, or will assist, a federally recognized Indian tribe or United States territory.	No	N/A
The proposed brownfield site(s) is impacted by mine-scarred land	No	N/A
Secured firm leveraging commitment ties directly to the project and will facilitate completion of the project/reuse; secured resource is identified in the Narrative and substantiated in the attached documentation.	No	N/A
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).	Yes	1
The proposed site(s) is in a federally designated flood plain.	Yes	2-3
The reuse of the proposed cleanup site(s) will facilitate renewable energy from wind, solar, or geothermal energy.	Yes	3
The reuse of the proposed cleanup site(s) will incorporate energy efficiency measures.	Yes	3
The proposed project will improve local resilience to the impacts of extreme weather events and natural disasters.	Yes	3 ABCA 11-14
The target area(s) is located within a community in which a coal-fired power plant has recently closed (2013 or later) or is closing.	No	N/A

Summary of Other Factors:
Population under 10,000: Redding is a small community of approximately 3,500 households and 8,830 people (2025 Census Bureau projection).
Property is adjacent to a water body: The Gilbert & Bennett Wire Mill property includes a 12-acre Factory Pond, an impoundment of the Norwalk River, which flows south over the factory dam bisecting the property. This application focuses on the 1.4-acre Weaving Parcel in the South Mill area of the property.
Proposed site is within a flood plain: The Norwalk River falls within the current 2010 FEMA floodway (FIRM 09001C0243F), and the South Mill Area including the Weaving Parcel falls partially within Zone A under the proposed 2023 FEMA update (FIRM 02001C0243G).
Use of renewable energy: The Town intends to incorporate solar panels on the roofs of new housing units, the former industrial buildings, over parking and other site areas.
Use of energy efficient measures: The Town intends to promote the use of the latest building envelope, appliance, water and habitat conservation in new construction and building renovations.

- Climate adaptation: The reuse plan focuses on creating a walkable mixed-use downtown with

adaptive reuse of historic structures, public parks along the pond shoreline, and a pedestrian and bike friendly greenway through the Wire Mill site connecting Georgetown Village and the Branchville commuter railroad station. Flood and climate mitigation measures will be addressed by expanding wetlands and creating greenspace along the pond, and utilizing green infrastructure such as rain gardens, pervious pavement, and infiltration zones where appropriate, and by complementing Redding's tradition of green space through vegetative plantings across the site. The recommended soil remediation alternative is in line with the goals of the Standard Guide for Greener Cleanups (ASTM E2893-16e1), which accomplishes cleanup of these areas while minimizing equipment energy use and emissions. The recommended alternative limits extensive excavation and equipment usage that would result in added energy use and emissions, as well as greater disturbances to land and ecosystems in close proximity to Factory Pond and the Norwalk River. Principles of sustainable resilient remediation (SRR) design will be incorporated into the project to limit environmental impacts, maximize social and economic benefits, and create resilience against the increasing threat of extreme weather events.

9. Releasing Copies of Applications
Not applicable.

Best Regards,

Julia Pemberton

January 25, 2024

Julia Pemberton

Submission Date

First Selectwoman
Town of Redding, CT

1. PROJECT AREA DESCRIPTION AND PLANS FOR REVITALIZATION (55 Points)

Target Area and Brownfields (15 points)

l.a. Overview of Brownfield Challenges and Description of Target Area (5 points)

The Target Area is the Georgetown neighborhood within the Town of Redding (population 8,830). Located in the Norwalk River valley at the corner of four towns: Redding, Wilton, Ridgefield and Weston, Georgetown is Redding's only urbanized area and falls within census tract # 09-001-240100. The area is zoned for business and commercial uses, small-lot single-family housing and multifamily housing. The Georgetown neighborhood developed around the Gilbert and Bennett Wire Mill, a maker of fabricated metal products. Established in 1818, the Wire Mill factory was the main source of employment for Redding residents and the focal point of Georgetown. Three hundred jobs were lost, along with Redding's largest source of commercial tax revenue, when the mill ceased operations in 1989, leaving behind a legacy of soil contamination and abandoned buildings, and depressing the economy of the surrounding neighborhood.

The Wire Mill property was acquired by a private developer in 2002 for a mixed-use development plan that won an EPA National Smart Growth Achievement award and designation as a "Green Building and Sustainable Design Designation" by the US Treasury Department. In the aftermath of the 2008 financial crisis the development plan failed. By 2014, Redding was faced with more than five million dollars in unpaid taxes and sewer fees, deteriorating historic structures, and unremediated soil. The Town began foreclosure proceedings on the property in 2015. In 2021, after six years of litigation, Redding acquired a 44-acre portion of the property through tax foreclosure, which includes the core of the former Wire Mill. The environmental and economic impacts continue to affect the Town and Georgetown. Given the size and extent of blight and contamination at the property, this grant is necessary to continue cleanup, facilitate redevelopment, and mitigate the long-term impacts of the site on the neighborhood.

1.b. Description of the Proposed Brownfield Site(s) (10 points)

The Wire Mill property is within a Transit Oriented Development District. The Metro North Branchville train station connecting Redding to New York City is located less than one mile north of the property. The 44-acre Wire Mill property is subdivided into several parcels, including multiple buildings and areas of soil contamination. **The property includes the 12-acre Factory Pond, an impoundment of the Norwalk River**, which flows south over the factory dam bisecting the property. This application specifically focuses on the Weaving Parcel located at 30 North Main St.

The Weaving Parcel (1.4 acres) is in the South Mill area of the property, bounded by the Norwalk River to the north and east and by North Main Street to the south. This property includes the four-story brick Weaving Building, the flagship structure of the Wire Mill property, which dominates the landscape of Georgetown's commercial district and is a prime candidate for adaptive reuse. The Weaving Building was used to produce woven metal fabric for use as cheese and metal safes, ash sifters, coal screens, camouflage netting, and heavy wire cloth. Former structures on this parcel include a lacquer storage and paint shed, copperas building, coal shed, oil recovery well, railroad siding, and USTs.

Multiple environmental investigations were conducted prior to 2007 and recently updated by the Town through 2021 and 2023 grants from the Connecticut Department of Economic and Community Development (DECD) Office of Brownfields Remediation and Redevelopment (OBRD) to perform Phase I/III investigations and fill data gaps from the prior studies. A Targeted Remedial Action Plan was developed for the Weaving Parcel under the 2007 investigations, followed by the successful completion of a soil vapor extraction system. Recent investigations identified several data gaps, and additional soil and groundwater sampling was conducted in Summer 2023. Based on a review of historical and current data, impacts above the Connecticut Remediation Standard Regulations (RSRs) were identified in this area from storage and handling of raw material, potential spills and releases through cracks in paved areas, and facility fill. Contaminants of concern (COCs) include metals, polycyclic aromatic hydrocarbons (PAHs) and extractable total petroleum hydrocarbons (ETPH). Sampling and observations within the Weaving Building identified the presence of asbestos containing materials (ACM), including pipe wrap and window

glazing, possible PCBs in sealants, and lead paint in windows and the building interior. Abating hazardous building materials in this building will allow the Town to expand the tenant base and enhance the appearance of the site to improve the value of the surrounding commercial area.

Revitalization of the Target Area (20 points)

1.c. Reuse Strategy and Alignment with Revitalization Plans (10 points)

The Wire Mill property, a key part of the Georgetown National Register Historic District, is listed in both the State and Regional plans for economic development. The property is identified as a priority in the Western CT Comprehensive Economic Development Strategy (CEDS), approved by the State in 2017 and by the Federal government in 2018 and is consistent with the most recent 2023-2028 Western CT CEDS (2017-22; 2022-27). Wire Mill redevelopment has been identified as a priority in the Town of Redding Plan of Conservation and Development (POCD) since 1998. These plans note that redevelopment of the Wire Mill is the Town's best opportunity to realize economic growth, expand its commercial tax base and provide affordable workforce housing.

A major Town goal is to promote the Georgetown's livability for residents, enhancing the character of Redding's commercial zone by cleaning up the blight of the former Wire Mill and investing in a walkable downtown that enlivens the area and stimulates economic growth in an environmentally and culturally sustainable manner. Presently the dilapidated factory buildings loom over Georgetown and present a health and safety hazard to the neighborhood. With a 2024 Brownfield Area Revitalization planning grant provided by DECD, the Town is in the process of finalizing a Master Plan encompassing the Wire Mill site and surrounding commercial and residential areas of Georgetown.

Based on feedback from public meetings and working groups held from 2022 to 2025, the emerging vision for redevelopment builds upon the 2005 master plan for a walkable mixed-use downtown, and includes:

- Affordable workforce and senior housing.
- Municipal spaces, public parking, public parks along the waterfront and a pedestrian and bike friendly greenway through the site connecting Georgetown Village and the Branchville Metro North railroad station.
- Adaptive reuse of the historic structures with concepts including residential lofts, municipal offices, public meeting space, artist/maker/incubator space, shared office, and medical facilities.

The Town plans to develop the Wire Mill site's multiple parcels in phases, so the community can access portions of the property and envision the potential of the historic architecture and Norwalk River setting. We feel this will attract creative uses for the site's historic core and build a rejuvenated Georgetown neighborhood. Phase I, currently underway and funded by a 2023 USEPA Cleanup Grant for 20 North Main St. and 50 Bennett St., includes HBM abatement of two partially occupied buildings adjacent to Georgetown's commercial district, and soil remediation to provide safe public access to the Norwalk River waterfront. This 2026 grant application is for Phase II on 30 North Main St., for HBM abatement and stabilization of the flagship Weaving Building and adjacent soil remediation to expand the tenant base, enhance the appearance of the site, and improve the value of the surrounding areas.

The Norwalk River falls **within the current 2010 FEMA floodway (FIRM 09001C0243F),** and the South Mill Area including **the Weaving Parcel falls partially within Zone A under the proposed 2023 FEMA update (FIRM 02001C0243G). Flood and climate mitigation measures** are being addressed within the Master Plan and through a program with Trout Unlimited and Save the Sound to lower or remove the Factory Dam and restore the Norwalk River through the Wire Mill Site. The Master Plan calls for **expanding wetlands, creating greenspace along the waterfront, utilizing green infrastructure such as rain gardens, pervious pavement, infiltration zones where appropriate, and by vegetative plantings.**

1.d. Outcomes and Benefits of Reuse Strategy (10 points)

The proposed remediation will help redevelop a property that is critical to Redding's future and will reinvigorate development in Georgetown. This project will provide public access and a foundation for the

Town to build needed affordable and workforce housing. As the site owner, the Town will be able to manage development intensity, complementing the existing Georgetown neighborhood.

In parallel with this remediation program, the Town's 5-year plan for the site is to improve the landscaping and maintenance of open areas and site structures, which will in turn revitalize Georgetown's adjacent Main Street area. Redevelopment of the site will, over time, create significant benefits for the community through the creation of public meeting and entertainment facilities as well as green open space and walking trails that will provide waterfront access, which is currently inaccessible to the community. The community will also be enriched through the restoration of the industrial heritage of the site as the Town begins to preserve and renovate the former industrial buildings.

The Town's vision is to incorporate **regenerative design strategies following the Living Building Challenge** in the Master Plan starting with **adaptive reuse of existing structures and measures to reduce emissions during construction**. As the site's owner, the Town intends to **minimize traffic impacts, encourage business diversity, promote the use of efficient building materials and appliances, restore habitats, utilize renewable energy, green infrastructure, and climate mitigation measures for renovated and new buildings**, reduce the site's carbon footprint, and enhance operating affordability. Where appropriate, the Town intends to use **solar panels on the roofs of new buildings, and over parking and other site areas**.

Town revenues will increase significantly as the site is redeveloped, benefiting the Town's financial status. The Town plans to reinvest this revenue back into the site, further benefitting the neighborhood.

Strategy for Leveraging Resources (20 points

1.e. Resources Needed for Site Characterization (5 points)

Extensive environmental investigations have been conducted at this site since the factory closure in 1989, including more than $30 million in private and public funds previously invested in the site that put the building blocks required for redevelopment into place. Currently awarded funding from DECD has been sufficient to fill data gaps, fully characterize the site, and prepare a Conceptual Remedial Action Plan.

1.f. Resources Needed for Site Remediation (5 points)

We are confident that the funding requested under this grant will be sufficient to complete the proposed remedial activities as outlined in this scope of work. Should unanticipated expenses arise, site service fees from current tenants are allocated to site management. A local fund balance of $600,000 is available to address unanticipated expenses.

1.g. Resources Needed for Site Reuse (5 points)

The Town plans to apply for additional state funding to support development of the trails and park area adjacent to the Norwalk River and to support the development of affordable workforce and senior housing. We anticipate additional federal and state grants will be needed in the future to address additional building stabilization and abatement of contaminated soils in the Mill Center Areas following development of specific reuse plans for these areas of the site.

1.h. Use of Existing Infrastructure (5 points)

The Weaving Parcel is adjacent to the local electric, water, sewer, natural gas and broadband services. The Weaving Building is currently underutilized as a storage facility. The proposed project will improve the potential of this landmark for more active tenant use and provide public access to the Norwalk River.

The existing water pollution control facility (WPCF) has already been expanded to provide sewer capacity for a redeveloped Wire Mill site. The WPCF expansion was funded in part by a $5 million USDA rural agriculture program loan to the Georgetown Special Taxing District. The expanded WPCF has a CT DEEP permitted capacity of 245,000 gallons per day (gpd). Of that capacity, 170,000 gpd is committed for the redevelopment of the Wire Mill site.

The Wire Mill site is adjacent to the Metro North Railroad Danbury Branch Line with the existing Branchville train station under one mile from the core of the target site. Commuter rail and local bus service along the Norwalk-Danbury Route 7 corridor is within 1/4 mile of the site. The Norwalk Valley Trail, a 30-mile walking and bicycle path between Norwalk and Danbury, will pass near the site.

2. COMMUNITY NEED AND COMMUNITY ENGAGEMENT (35 Points)

1.a. Community Need (20 points)

2.a. The Community's Need for Funding (5 points)

Redding is a small community of approximately 3,500 households and 8,830 people. It lacks a commercial tax base and is overly reliant on residential property taxes to fund public services. The local tax burden on residents is high. 33 percent of Redding households are cost burdened, according to data published in the 2021 United Way Alice Report for Connecticut: A Financial Hardship Study.

The Wire Mill property, traditionally a major component of Redding's tax base, has been off the tax rolls since the bankruptcy of the site's private developer in 2008. A decline in State funding to the Town has unfortunately coincided with the drop in tax revenue from the Wire Mill property's closure nearly 40 years ago. Redding has minimal commercial districts for traditional employment and business development; but Georgetown is one, and the redevelopment of the Wire Mill site will have long-term importance to both the tax base and the vibrancy of the community.

Redding lacks staff capacity and local funds needed to clean up the industrial contamination of the site and to redevelop it on its own. Local funds are needed for immediate building stabilization, management and oversight of the site and its current tenants, and to complete redevelopment planning. State and Federal brownfields redevelopment and infrastructure funding is needed to leverage these limited local funds.

2.b. Health or Welfare of Sensitive Populations (5 points)

According to EJSCREEN, Census Tract 2401, that includes the Wire Mill, includes several populations that exceed the state and national average, including children under the age of 5 (66th percentile nationally, 74th in state), population over 65 (81st percentile nationally), linguistically isolated and unemployed (both 65th percentile nationally). These populations disproportionately suffer from the welfare issues associated with blight and are exposed to health risks from contamination. There are a daycare facility and multifamily residential area adjacent to the Wire Mill site. Graffiti and debris on-site and in buildings indicate that people can access the site at all times of the day and night. The proposed remediation that will be facilitated by this grant will clean up and secure the areas of the site closest to these populations.

2.c. Greater Than Normal Incidence of Disease and Adverse Health Conditions (5 points):

According to EJSCREEN, the cancer prevalence in Census Tract 2401 is at the 97th percentile both across the state and the nation. Exposure to hazardous pollutants found at the site, including heavy metals and hazardous building materials exacerbate the risks and health burdens to the sensitive populations in the Target Area. This grant will directly reduce these threats by eliminating contaminated soil and hazardous building materials that are risk factors for cancer and other conditions.

2.d. Economically Impoverished/Disproportionately Impacted Populations (5 points)

Georgetown is a historically mixed-income immigrant neighborhood located in the only urbanized census tract in Redding. There are several environmental indicators that exceed the national average for Georgetown CDP (Ozone 95th percentile, Pb paint 52nd percentile, Superfund proximity (57th percentile) and USTs (53rd percentile), which indicate additional burdens on the local community beyond the contamination and blight related to the mill. The area is characterized by modest homes on small parcels originally constructed by the Gilbert & Bennett factory workers whose families lived, worked, went to school, and prayed, all within walking distance of the factory. Further deterioration of the site structures poses environmental risks to families living near the Wire Mill site and causes further degradation of property values in Georgetown.

Redevelopment of the Wire Mill property will increase the diversity of housing options in the area, which

is expected to lead to a greater diversity of incomes among its residents and provide an opportunity for small businesses to flourish. The redevelopment of the property will not displace current residents or businesses in the Target Area, the Georgetown neighborhood, and the cleanup of the contaminated soil and hazardous building materials at the site will decrease the exposure of individuals sensitive to environmental burdens. The redevelopment is intended to increase amenities in the neighborhood, such as public access to the waterfront, other public and municipal uses, and additional parking for businesses. In addition, its location near the Metro North rail line and local bus routes makes the site attractive to those residents who may be dependent on public transportation for their jobs and those traveling to work in the area.

Community Engagement (15 points)

2.e. Project Involvement (5 points) and 2.f Project Roles (5 points)

There are many local organizations that will contribute to this project, and the opinions of residents will be a priority in the Wire Mill redevelopment. The main partners include, but are not limited to:

Entity Name	Point of Contact	Project Role
G&B Wire Mill Advisory Committee (WMAC)	Amy Atamian, Chair [redacted]	Leads redevelopment planning, RFP preparation, contractor selection, oversight, and communications.
Redding Economic Development Committee (EDC)	Richard Wenning, Chair 303.601.7454 rich@befoundation.org	Leads involvement and solicitation of business/arts input in reuse planning. Provides research on similar brownfield redevelopment projects.
Georgetown Village Restoration, Inc. (GVRI)	Nic Palazzo 203.544.3841 nicpalazzolandscapinginc.com	Represents residents and business in Georgetown Village.
Western Connecticut Council of Governments (WestCOG)	Francis Pickering fpickering@westcog.org	Provides continuity with regional plans, technical assistance and other regional coordination.
Historic Review Committee	Raymond D'Angelo, Chair	Advises on historical preservation and regulatory review.

2.g Incorporating Community Input (5 points)

The Town will continue to hold regular public meetings, publish information on the Town website and publish articles for the Redding Sentinel to update the community on the progress of environmental assessment, remediation, and redevelopment planning. Monthly meetings of the WMAC are open to the public, live streamed and recorded with minutes taken and posted to the Town website. The First Selectman hosts an informal monthly "Brown Bag" luncheon for public conversation on current Redding topics, which often includes a discussion about the Wire Mill. The Town website includes a dedicated page for the current Revitalize Georgetown program and a page for the Wire Mill site that provides a repository for all reports and documents related to the site and the Town keeps residents updated through e-mailed weekly news updates, local media outlets, and on the Town's social media.

Community input from many sources (workshops, public meetings, local news, committee outreach) is incorporated into the decision-making process for Wire Mill redevelopment planning, with the Master Plan on target for Planning Commission approval in Q2 of 2026.

3. TASK DESCRIPTIONS, COST ESTIMATES, AND MEASURING PROGRESS (55 Points)

3.a. Proposed Cleanup Plan (10 points)

This project is vital to the Town's Revitalization Georgetown Plan, and critical to program momentum. $4 million in USEPA funding will abate HBM at the Weaving Building, weatherize the building and remediate soils in the adjacent courtyard preparing this area for future reuse. This building is most visible from Georgetown's commercial district; its enhancement will improve the quality of the business area and

draw-in private development.

The Weaving Building has deterioration from exposure to weathering at the roofs, windows, and facades, and widespread defective paint on walls, beams and ceilings. Roofing includes asbestos-containing materials (ACM). Windows include hazardous lead, PCBs, and asbestos. Defective paints are lead and PCB-containing. Other HBMs include damaged ACM pipe and duct insulation. Under the project scope, the Town will complete weather sealing and HBM abatement of the Weaving Building where there is potential for HBM migration to North Main Street, the Weaving Courtyard and adjacent Norwalk River.

Building envelope sealing includes abatement of ACM roofing layers and roof repairs, exterior abatement of loose and flaking paint (lead and PCB containing), covering or replacing damaged window sashes, and other exterior repairs required to weather seal and prevent further damage to the structure and eliminate the risk of HBM migrating to the environment. Within the Weaving Building, accessible ACM, loose and flaking paint (lead and PCB containing) will be removed from wood ceilings and beams, and brick walls and cleaned off floors. Other abatement activities include removal and infill replacement of damaged wood window systems, and removal of loose and flaking paint from wood window sashes and metal window systems. Soil and groundwater testing indicate impacts from fill material, prior manufacturing, and former underground storage tanks (USTs). Remediation includes obtaining a widespread polluted fill variance to exempt the DEEP Remediation Standard Regulation (RSR) pollutant mobility criteria (PMC) and installing a cap to render soil inaccessible for compliance with the direct exposure criteria (DEC).

Targeted excavation to the groundwater table at seven areas will remove approximately 3,600 tons of impacted soil with non-fill related PMC exceedances and support cap construction in accordance with RSR requirements. Following excavation, confirmatory sampling will demonstrate attainment of remedial objectives. Excavations will be lined with a demarcation liner and backfilled to grade with clean material. This project will help redevelop a property critical to Redding's future and reinvigorate development in Georgetown, opening the site to public access and providing needed mixed-income housing not feasible elsewhere in Redding, which has an AMI of $148,000. As site owner, the Town can manage development intensity, complementing the small lot single and multi-family homes of Georgetown.

Description of Tasks/Activities and Outputs (25 points):

TASK 1: PROGRAM MANAGEMENT (COOPERATIVE AGREEMENT OVERSIGHT)
i. Project Implementation: EPA-Funded: Travel expenses attend the biannual National Brownfields Conference; prepare quarterly reports for EPA and ACRES updates, and annual financial reporting. Non-EPA Funded: Town 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.
ii. Anticipated Project Schedule: **(Months 1-48)** QEP procurement within 90 days of NTP, quarterly reports within 30 days after the reporting period; continuous ACRES updating and project tracking; annual conference attendance.
iii. Task/Activity Lead: Town Staff and WMAC
iv. Outputs: QEP procurement; Quarterly reports; financial reports; ACRES updates; conference attendance; meeting minutes.
TASK 2: COMMUNITY OUTREACH & ENGAGEMENT
i. Project Implementation: EPA-Funded: Preparation of outreach materials including flyers, newspaper articles, and social media. Non-EPA Funded: Town staff and project partners will conduct community engagement and involve

the local community in the decision making. Quarterly public meetings will be conducted to inform the community and solicit public input.
ii. Anticipated Project Schedule: **(Months 1-48)** Activities will begin within 60 days of NTP; bi-annual public meetings; continuous engagement outreach.
iii. Task/Activity Lead: Town Staff, WMAC and Project Partners
iv. Outputs: Outreach materials; newspaper articles; social media updates; meeting presentations; public meetings; meeting minutes; sign-in sheets; public comments.
TASK 3: CLEANUP PLANNING
i. Project Implementation: EPA-Funded: Documents for cleanup implementation, including Analysis of Brownfield Cleanup Alternatives (ABCA), Quality Assurance Project Protocol (QAPP), abatement design technical specifications, and bid documents. Acquisition of the necessary permits and notifications to the CT Department of Public Health and CT DEEP. Develop cleanup plan for (a) soil remediation for the Weaving Parcel and (b) HBM abatement plans for the Weaving Building. The QEP will oversee the completion of these activities for the project. Non-EPA Funded: Town Staff and WMAC will solicit bids and select the cleanup contractor, procurement and oversee the QEP activities.
ii. Anticipated Project Schedule: Remedial design investigation (months 6-9); finalize RAP, ABCA, and develop QAPP and bidding documents (months 9-12) ; permitting and approvals (months 12-15).
iii. Task/Activity Lead: QEP with coordination and oversight from Town Staff and WMAC.
iv. Outputs: Outreach materials; newspaper articles; social media updates; meeting presentations; public meetings; meeting minutes; sign-in sheets; public comments.
TASK 4: CLEANUP ACTIVITIES
i. Project Implementation: EPA-Funded: QEP will oversee remedial activities as outlined in the ABCA (cleanup and disposal of contaminated soils and abatement and disposal of hazardous building materials) to be performed by licensed abatement and remediation contractors. Cleanup activities to include: Soil excavation, transportation, testing and disposal; regrading and site earthwork, and site preparation (a); visual observation and monitoring of remediation activities (a) and abatement and confirmatory air sampling to document proper abatement conditions (a,b). Licensed project monitors will oversee all abatement activities as required by the CT Department of Health. Cleanup activities at the Weaving Parcel will be overseen by the QEP and a CT Licensed Environmental Professional (LEP). Non-EPA Funded: Town Staff and WMAC will oversee progress and QEP activities.
ii. Anticipated Project Schedule: HBM Abatement (months 15 to 36); Soils Remediation (months 36-44); Final Report (months 44-48)
iii. Task/Activity Lead: The QEP and Licensed abatement project monitors coordinated with Town Staff and the WMAC.
iv. Outputs: Cleanup activities; manifests for proper disposal; abatement report.

Cost Estimates (15 points)

Task 1: Program management [$16,200]: Reporting/records management: [$13,000] **(**Engineer/Admin ($150/hr avg.; 6 hrs/quarter) Town staff hours will not be charged to the grant. Attendance at Brownfield Conference: [2,700] (travel $600; 4 nights hotel/per diem; lodging and M/I capped to CONUS rates)
Task 2: Community Outreach & Engagement: [$6,000]: Facilitated meetings [$6,000] (4 meetings over

3 years x 10 hrs at $150/hr). Town staff time and consumables will not be charged to this grant.
Task 3: Cleanup Planning [$107,000]: ***Soil Remediation: [$71,500]*** (Complete remedial design investigation and in-situ waste characterization sampling [$35,000]; finalize/prepare RAP, ABCA, QAPP, bid docs; obtain permitting and approvals [$30,000]; 10% contingency of unknown/unforeseen conditions during remedial design investigation [$6,500]). ***Interior Abatement [$13,500]*** (prepare bid documents and abatement alternative work practices [$13,500]); ***Exterior Abatement/Weather Seal: [$22,000]*** (remediation contract documents (plans & specs, coordination support with SHPO, bidding support)
Task 4: Cleanup Activities (Contractual) [$371,300]: ***Soil Remediation [$132,000]***: remediation oversight and PM [$22,500] ($1,500/day x 15 days @ 250 tons/day); air monitoring [$6,000] ($2,000/week @ 3 weeks); lab analysis [$56,000] (140 samples @ $400/ea); sampling equipment and mileage [$5,250] ($350/day @ 15 days); PM oversight [$5,250] (30 hrs @ $175/hr); install replacement monitoring wells [$15,000], Remedial Action Report [$10,000]; contingency [$12,000] (10% unknown/unforeseen conditions). ***Interior Abatement Oversight [$145,300]:*** abatement oversight with air monitoring [$111,600] ($1,240/day @ 90 days); laboratory analysis [$2,000] (200 samples @ $10/ea); sampling equipment and mileage [$7,200] ($80/day @ 90 days); project oversight/data eval [$16,000]; Closeout Report [$8,500]. ***Exterior Abatement/Weatherization [$94,000]*** architect oversight; design during construction [$94.000].
Task 4: Cleanup Activities (Construction) [$3,499,500]: ***Soil Remediation [$440,000]***: excavate/transport/disposal at South Parcel [$144,000] (3,600 tons @ $40/ton); backfill [$216,000] (3,600 tons @ $60/ton); install geotextile liner [$10,000] (20,000 SF @ $0.50/SF); mobilization/demobilization [$10,000]; site preparation/dust control/fencing [$10,000]; contractor health & safety/sanitary facilities [$5,000]; site clearing and preparation [$5,000]; contingency [$40,000] (10% unknown/unforeseen conditions). ***Interior HBM Abatement [$1,414,500]***, pipe insulation [$45,000] (1,800 lf pipe insulation x $25/lf); duct breaching gaskets [$27,000] (600 sf x $45/sf); loose and flaking paint scraping [$495,000] (55,000 sf wall, beam, ceiling x $9/sf); paint stabilization [$340,000] (136,000 sf x $2.50/sf); wood floor cleanup [$189,000] (63,000 sf x $3/sf); concrete floor cleanup [$42,000] (21,000 sf x $2/sf); Universal and misc. waste removal [$7,500]; mobilization and general conditions [$87,000]; contingency [$182,000] 10% unknown/unforeseen conditions (voids, plenums, subsurface, etc.). ***Exterior HBM Abatement/Weatherization [$1,645,000]:*** roof material removal/disposal as ACM [$220,000] (22,000 sf roofing materials x $10/sf); asphalt roofing [$190,000] (15,000 sf); EPDM roofing [$175,000] (7,000sf); allowance for deck repair [$65,000]; parapet cap repair [$30,000]; flashing [$65,000]; roof drains [$34,000]; cornice/misc carpentry [$35,000]; wood window demolition/disposal [$66,000]; wood window frame and caulk cleanup [$250,000]; metal window loose and flaking paint/glazing cleanup [$50,000]; Weather seal windows/openings [$355,000] (175 wood @ $1600, 50 metal @ 800, 7 door openings @ $5,000); structural repair at roof [$75,000] (brickwork); equipment rental [$35,000] (scaffolding, forklift, material handling).

	Task 1	**Task 2**	**Task 3**	**Task 4**	**Total**
	Program Management	Community Engagement	Cleanup Planning	Cleanup Activities	
Travel	$2,700	$ -	$ -	$ -	**$2,700**
Contractual	$13,500	$6,000	$107,000	$371,300	**$497,800**
Construction	$ -	$ -	$ -	$3,499,500	**$3,499,500**
Total Direct	$16,200	$6,000	$107,000	$3,870,800	**$4,000,000**
Total Indirect	$ -	$ -	$ -	$ -	$ -
Total Federal (Direct + Indirect)	**$16,200**	**$6,000**	**$107,000**	**$3,870,800**	**$4,000,000**

3.g. Plan to Measure and Evaluate Environmental Progress and Results (5 points)
The Project Manager will review the schedule monthly to track project progress, adjust the schedule if needed, and will submit Quarterly progress reports to the EPA. Cleanup results will be documented including amounts of contaminants removed from the site. Project progress will be updated in the ACRES database regularly. For each task, we will track the outputs, outcomes, and layout specific measures. For

Task 1, we will document project progress in quarterly reports and ACRES updates; for Task 2, we will track information/outreach materials and report community outreach elements; for Task 3, we will track outputs including ABCA, QAPP, abatement specifications and bid documents and permits, and ensure we meet the deadlines as outlines in the workplan; for Task 4, we will track the outcomes in soil remediation and hazardous building materials abatement and evaluate achievement of cleanup standards.

4. PROGRAMMATIC CAPABILITY AND PAST PERFORMANCE (30 Points)

Programmatic Capability (15 points)

4.a. Organizational Structure (5 points)

The Office of the First Selectwoman Julia Pemberton will provide general oversight for this grant along with the **Gilbert & Bennett Wire Mill Advisory Committee** which will oversee the scope of work, schedule and subcontractor selection and performance. The **Naugatuck Valley Council of Governments Brownfield Partnership** will provide technical assistance. Professional staff from Town offices will be assigned by the First Selectwoman to perform contract compliance and administrative duties and ensure that the site work complies with zoning, conservation, building and health regulations.

4.b. Organizational Structure (5 points); 4.a.ii Description of Key Staff (5 points)

Program Executive: Julia Pemberton, Redding First Selectperson. Reviews and approves all contracts, provides program oversight and public outreach. Redding's CEO for the past 12 years, responsible for the Town's acquisition of the Wire Mill site and has been instrumental in planning site remediation and reuse.

Contract Administrator: Jim Sanders, Redding Finance Director. Oversees grant administration and compliance with regulatory filings. Prior to becoming Finance Director in 2022, Jim had a 30-year career as a finance executive leading business units at IBM. Jim has extensive knowledge of financial planning, accounting, expense management and internal controls. The Finance office has been recognized with Certificates of Excellence for financial reporting for its Comprehensive Annual Financial reports.

Project Manager: Amy Atamian, Chair GBWAC and WPCC. Oversees project schedule, scope and budget; coordinates submission of project reports to EPA with QEP; supports program oversight and public outreach. Amy has over 30 years of experience in the environmental field as a project manager and data analyst, having worked on significant RCRA projects. As a Zoning Commissioner, Amy participated in the review and approval of the prior development plans for the Wire Mill site and has coordinated subcontractor work for current Wire Mill federal and state grant programs.

Regulatory Compliance: Michael Moran, Redding Land Use Officer. Ensures compliance with land use regulations for site work.

Building Official: Shaun Donnelly, Redding Facility Director. Provides HBM abatement and building demolition oversight.

Health & Safety: Chris Wegrzyn, Redding Health Officer. Provides oversight of health monitoring during construction.

4.c. Acquiring Additional Resources (5 points)

The Town of Redding is committing its resources and personnel and will augment in-house capabilities with additional expertise solicited through an RFP, a regular practice for many projects. Redding will hire a QEP/CTDEP-approved LEP to generate required cleanup plans and oversee remedial actions. Bid requests and RFPs will be published in local newspapers and on the state procurement website in compliance with local, state, and federal laws. The Town has policies and procedures in place for the competitive and equitable procurement of any additional technical, legal or construction support that may be needed. The Town is a member of the Naugatuck Valley Council of Governments Brownfield Program and works in conjunction with the WMAC comprising subject area experts and representatives from the EDC, GVRI, and Town Boards and Commissions. Prevailing wage (CGS Section 31-53), and other Federal, state, and local laws regarding the procurement of contractors to conduct the cleanup will be followed.

Past Performance and Accomplishments (15 points)

4.d. Currently Has or Previously Received an EPA Brownfields Grant (15 points):

4.d (1) Accomplishments (5 points)

In 2024, The Town was awarded a $1.991M USEPA Cleanup Grant to remediate soils, perform HBM abatement and building demolition. The Town contracted Tighe & Bond (T&B) to develop the ABCA, specifications documents for demolition of the former Cafeteria and residential structure, HBM Abatement for the Machine Shop and Main Office, and soil remediation at the OMS and West Pond parcels. The Town also contracted with Architectural Preservation Studio (APS) to coordinate with SHPO regarding building demolition and HBM abatement at building facades and provide restoration specifications following HBM abatement. We conducted material removal testing at the Machine Shop building façade to inform abatement and restoration specifications, prepared a restoration plan for the Main Office, and submitted documentation to SHPO of two historical structures prior to demolition. Specifications for demolition, and HBM abatement at the Machine Shop and Main Office are in progress, with the intention of putting these out to bid early in Q1 2026 for work during the 2026 construction season. We remain on-schedule for soil remediation in 2027.

4.d. (2) Compliance with Grant Requirements (5 points)

Under Task 1: Program Management, procured QEP and Architectural Preservationist, coordinated monthly and as-needed with program partners and EPA program manager; on-time quarterly ACRES submissions documenting work completed and in-progress; implemented strong controls to track subcontractor invoicing, including requirements for timely monthly billing and internal team review of work completed against scope and budget; prompt reimbursement submission and drawdown processing with USEPA. We have currently drawn down 5% of the grant funding and anticipate increasing the rate of draw-down once construction begins in 2026. Amy Atamian attended the 2025 National Brownfield conference in Chicago.

Under Task 2: Community Outreach and Engagement, submitted the Community Relations Plan and established a repository on the Town website for all site investigations and documents for the Wire Mill; established a separate Revitalize Georgetown page with general information about the Georgetown Master Plan program that hosts a StoryMap with interactive details on site history, planning, preservation, and environmental programs about the Wire Mill and Georgetown area.

Additional public outreach includes monthly updates at the WMAC meetings that are recorded, posted to the Town website, and open to the public. This committee also provides periodic updates to the Board of Selectmen and other Town commissions. In addition, our local newspaper, the Redding Sentinel, regularly publishes articles about the work going on at the Wire Mill, the First Selectwoman hosts monthly brownbags, and several local organizations have been instrumental in sharing information and providing feedback.

Under Task 3: Cleanup Planning, attended a kick-off meeting with EPA and QEP; applied for enrollment in the VCP; coordinated with SHPO regarding building demolition and façade repairs; prepared ABCA updates following a 30-day public review and comment period. Revisions note the QEP will manage site activities to reduce air emissions, and the separately funded Revitalize Georgetown planning program is taking a lead in developing plans to incorporate regenerative design and resilience in the master plan. The QEP and architectural review team are in the process of finalizing the remedial design and engineering documents, QAP and HSA after extended discussion regarding the façade abatement/restoration approach.

Bid docs, in review for the Machine Shop and Main Office, are on target for issuance in Q1 2026 with contracting finalized in Q2 2026.

Task 4: Cleanup Activities: Cleanup activities are scheduled to begin by Q3 2026 with HBM abatement at the Main Office and Machine Shop Buildings. Soil Remediation is scheduled after HBM abatement beginning in 2027 with closure by Q3 2028.

4.e. Has Not Received an EPA Brownfields Grant but has Received Other Federal or Non-Federal Assistance Agreements (15 points): NA.

4.f. Never Received Any Type of Federal or Non-Federal Assistance Agreements (8 points): NA.

FY24 EPA Cleanup Grant Application

Response to Threshold Criteria

1. Applicant Eligibility

The Town of Redding is an eligible entity for the U.S. Environmental Protection Agency's Brownfield Cleanup Grant as a "General Purpose Unit of Local Government" under 2 CFR § 200.64.

2. Previously Awarded Cleanup Grants

The Town of Redding affirms that the Site, the Weaving Parcel at 30 North Main Street, has not received funding from a previously awarded EPA Brownfields Cleanup Grant.

3. Expenditure of Existing Multipurpose Grant Funds

The Town of Redding affirms that it does not have an open EPA Brownfields Multipurpose Grant.

4. Site Ownership

The Town of Redding is the sole owner of the 44-acre Gilbert & Bennett Wire Mill (G&B) property, which comprises three tax parcels: 20 North Main St., 30 North Main St., and 50 Bennett St. Ownership is in fee simple title. The Town of Redding began a tax foreclosure proceeding with respect to the property in 2015 and took title to the property on February 16, 2021. The subject of this application is the Weaving Parcel at 30 North Main St. The Town of Redding will retain ownership of the Site for the duration of the time in which Brownfield Cleanup Grant funds are disbursed for the cleanup of the Site.

5. Basic Site Information

a. Site Name: Former Gilbert & Bennett Wire Mill Manufacturing Company (G&B)
b. Site Address: 30 North Main St. Redding CT, 06896 (primary address)
c. Current Owner: Town of Redding, Connecticut

6. Status and History of Contamination at the Site

a. Contamination Type: The Wire Mill property is contaminated with hazardous materials and petroleum products from former factory operations conducted between 1818-1989. These operations produced byproducts such as waste acids, alkalis, solvents, oils, paints, lead and zinc galvanizing wastes, skimmings/dross, and metal hydroxide sludge. During factory operations, the metal hydroxide sludge was placed in a surface impoundment area on an adjacent parcel (15 North Main St.) downgradient of the target site which was the subject of USEPA RCRA (Subtitle C) remedial action in 2001 (EPA ID CTD001162775). 15 North Main St. is a separate property not owned by the Town and not part of this grant application.

b. Operational History and Current Uses: G&B operated as a wire mill from 1818-1989 and produced metal fencing, insect screening, sieves, outdoor furniture, animal cages, reinforcing mesh for concrete and a variety of other metal products. The primary operations included:
   - Rod Cleaning: Until 1986, scale was removed from iron rods by rinsing them in acid baths, followed by water rinses and coating with lime, borax, or copper sulfate. After 1986, scale was removed mechanically.

- Rod Drawing: Steel rod was drawn through a series of round dies to produce coarse and fine wire. Soaps and animal fat were used to reduce friction in this process.
- Annealing: Wire was annealed to make the metal more malleable. Coarse wire was annealed in molten lead baths. Fine wire was annealed using direct flame heaters.
- Galvanizing: Prior to galvanizing, wire was run through an acid bath, a water rinse, and a flux bath primer. The wire was then pulled through a molten zinc bath, followed by a water quench. The wire was then coated with a water-soluble oil.
- Fabrication: Fabrication included the bending, twisting, and/or welding of wire.
- Final steps in the fabrication process included painting, lacquering, or vinyl coating.

Manufacturing operations ceased in July 1989. G&B continued to operate administrative office functions from the property until filing for bankruptcy in 1998. In October 2002, Georgetown Land Development Corporation (GLDC) purchased most of the former manufacturing property and American Restoration Resources, Inc. (now Georgetown Redevelopment Corporation), purchased the four-acre parcel containing the surface impoundment area in 2002.

GLDC developed a master plan for the site as a transit-oriented walkable downtown mixed-use village, performed environmental site investigations, developed remedial action plans, performed limited soil remediation, and began hazardous building material (HBM) abatement and removal of non-historical buildings.

In 2008 GLDC became insolvent and was unable to secure new capital investment to advance the project. In 2011, GLDC sold a portion of its property to JP Industrial Park, LLC. GLDC was unable to conduct the planned remedial actions, HBM abatement or stabilization of the remaining historic brick and masonry factory buildings.

The Town of Redding instituted tax foreclosure proceedings with respect to the 44-acre GLDC property in 2015 and acquired the title to the property on February 16, 2021 and intends to remediate the site in preparation for redevelopment.

Currently, the Weaving Building is the only remaining structure at the 30 North Main St. parcel and is used to store dry goods. Other uses at the Wire Mill site include landscapers and a tree service for storing landscape materials, wood, and equipment. Two of the remaining buildings at the 20 North Main St. parcel are occupied. These are the Machine Shop, which houses National Park Service operations for Weir Farm and the Main Office Building with offices and a conference room.

c. Environmental Concerns: elevated metals above and below regulatory criteria were noted throughout the subject area and attributed to possible historical fill material and/or atmospheric deposition from historical manufacturing activities. Petroleum impacts and SVOCs (mainly polycyclic aromatic hydrocarbons [PAHs]) above regulatory criteria were identified in the Weaving courtyard. Asbestos containing materials including pipe insulation, flooring, cement boards, and roofing were observed in the Weaving Building as were potential presence of lead and PCBs in paint, and caulking.

d. How the site became contaminated: site contamination occurred during the period of manufacturing operations between 1818 and 1989 directly through product manufacturing operations, limited manufactured gas operations, raw material storage, historical fill materials, groundwater infiltration, and air deposition from manufacturing processes.
e. Nature and Extent of contamination: contamination was identified throughout the site and is concentrated within the central portion of the former Wire Mill where manufacturing processes were primarily completed. Contamination identified within the subject area appears to be sporadic and typical of fill material and/or atmospheric deposition, although certain impacts identified were attributed to other sources including former underground storage tanks, deterioration of lead-based paint on structures, impacts associated with paint and lacquer storage, and the railroad.

7. Brownfields Site Definition

The Town of Redding affirms that the Site [and property] meets the definition of a brownfield under CERCLA § 101(39) as described in the Information on Sites Eligible for Brownfields Funding under CERCLA § 104(k). The Town of Redding affirms that the Site:

a. Is not listed (or proposed for listing) on the National Priorities List (NPL).
b. 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. Is not subject to the jurisdiction, custody, or control of the U.S. government.

8. Environmental Assessment Required for Cleanup Grant Applications

The Site and property have been the subject of multiple environmental investigations and ongoing remediation dating back to the 1980s, when the EPA ordered G&B to perform certain remedial activities. GLDC continued corrective activities after it acquired the property. CT DEEP approved a Remedial Action Plan, dated 2007, prepared by Fuss & O'Neill.

Utilizing a 2021 DECD Assessment Grant obtained by the Town, Tighe & Bond conducted a Phase I Environmental Site Assessment and supplemental studies including: a data gap analysis (DGA), HBM survey, building structural evaluation, and river wall evaluation. The following reports were completed under this grant and provided to CT DEEP:

- Phase I Site Assessment (ESA), Tighe & Bond, Inc., dated June 2023
- Environmental Data Gap Analysis Report, Tighe & Bond, Inc., June 2023
- Hazardous Building Materials Data Gap Analysis Report, Tighe & Bond, Inc., June 2023
- Summary of Phase II Findings Memorandum, Tighe & Bond, Inc., October 12, 2023

The supplemental studies have identified 11 additional AOCs. Tighe & Bond conducted Phase II and limited Phase III investigations from July through August of 2023 to address data gaps associated with the West Pond and North Mill Areas of the property and has developed an Analysis of Brownfield Cleanup Alternatives (ABCA) and opinions of probable costs for remediation and HBM abatement of priority areas of the property. The Town received a second DECD grant in 2023 that has been used to perform additional sampling required to complete site characterization, refine the remediation scope, develop a final ABCA and prepare a conceptual remedial action plan for the entire property. The following reports were completed under this grant and provided to CT DEEP:

- Supplemental Phase III Environmental Site Assessment, Tighe & Bond, Inc, July 29, 2025
- Conceptual Remedial Action Plan, Tighe & Bond, Inc, July 29, 2025

9. Site Characterization

b. Applicant other than a State or Tribal Environmental Authority eligible to be enrolled in a voluntary response program

A letter from Amanda Limacher, Brownfield Coordinator from CT DEEP dated January 9, 2026, is attached certifying the following for the FY26 EPA Brownfield Cleanup Grant:

i. The Site is eligible to be enrolled in the Voluntary Remediation Program (VRP) pursuant to CGS §22a-133x.
ii. The Town applied to enroll in the VRP in December 2025.
iii. DEEP concluded there is a sufficient level of site characterization from the ESA and RAP Reports performed to date for the remediation work to begin at the Site.

10. Enforcement or Other Actions

The Town of Redding affirms there are no ongoing or anticipated environmental enforcement or other actions related to the Site.

11. Sites Requiring a Property-Specific Determination

The Town of Redding affirms the Site does not require a property-specific determination because there are no planned or ongoing removal actions under CERCLA; no unilateral administrative order, court order or administrative order on consent has been issued or entered into.

12. Threshold Criteria Related to CERCLA/Petroleum Liability

a. Property Ownership Eligibility – Hazardous Substance Sites

i. EXEMPTIONS TO CERCLA LIABILITY

(1) Indian Tribes: N/A
(2) Alaska Native Village Corporations & Alaska Native Regional Corporations: N/A
(3) Property Acquired Under Certain Circumstances by Units of State and Local Government

a. Describe in detail the circumstances under which the property was acquired.
The Town of Redding acquired the property through municipal foreclosure of tax liens, which is an exemption from the definition of "transfer of establishment" in the Property Transfer Act.
b. Provide the date on which the property was acquired.
The Town of Redding acquired the property on February 16, 2021.
c. Identify whether all disposal of hazardous substances at the site occurred before you acquired the property.
The applicant is a municipality and has no direct or related liability for contamination of the property. Prior to taking title to the property, the Town of Redding entered the property into the State of Connecticut Department of Energy and Environmental Protection Municipal Brownfields Liability Relief (MBLR) Program pursuant to Section 22a-133ii of the Connecticut General Statutes (CGS). The Town is exempt from liability under CERCLA Section 101 (20)(D).
d. Affirm that you have not caused or contributed to any release of hazardous substances at the site.
The Town of Redding affirms it has not caused or contributed to any release of hazardous substances at the Site or property.

e. Affirm that you have not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the site.
The Town of Redding affirms that it has not, at any time, arranged for the disposal of hazardous substances at the Site or transported hazardous substances to the Site.

ii. EXCEPTIONS TO MEETING THE REQUIREMENTS FOR ASSERTING AN AFFIRMATIVE DEFENSE TO CERCLA LIABILITY

(1) Publicly Owned Brownfield Sites Acquired Prior to January 11, 2002: N/A

iii. LANDOWNER PROTECTIONS FROM CERCLA LIABILITY

(1) Bona Fide Prospective Purchaser Liability Protection: N/A

b. Property Ownership Eligibility – Petroleum Sites

Current and past owners and site acquisition: The Town of Redding is the current owner of the Site, acquiring the 44-acre property through municipal foreclosure of tax liens against the Georgetown Land Development Company (GLDC) and JP Industrial Park LLC on February 16, 2021.

State designation as a combination of hazardous substances and/or petroleum: The Town of Redding requested a brownfield acknowledgement letter from the CT DEEP on October 16, 2023. A letter from Amanda Limacher, Brownfield Coordinator from CT DEEP dated January 9, 2026, is attached stating that the subject property is contaminated with both hazardous substances and/or petroleum products.

Manufacturing Operations at the site: The site is the location of the former Gilbert & Bennett Wire Mill Manufacturing Company. Gilbert & Bennett operated a wire mill at the site from 1818 through 1989 and produced metal fencing, insect screening, sieves, outdoor furniture, animal cages, reinforcing mesh for concrete, and a variety of other metal products. Manufacturing operations ceased in July 1989. Gilbert & Bennett continued to operate administrative office functions from the site until filing for bankruptcy in 1998.

Redevelopment and Remediation: In October 2002, Georgetown Land Development Corporation (GLDC) purchased most of the former manufacturing property and developed a master plan for the site as a transit-oriented walkable downtown mixed-use village, performed environmental site investigations, developed remedial action plans, performed limited soil remediation, and began hazardous building material (HBM) abatement and removal of non-historical buildings. In 2008, GLDC became insolvent and was unable to secure new capital investment to advance the project.

The Town acquired the site in 2021through foreclosure. In 2021 and 2023, the Town received grants from DECD to conduct Phase I/II/III investigations to close data gaps, evaluate buildings, complete the Environmental Site Assessment and prepare a Conceptual Remedial Action Plan for the site, which have all been completed. In 2024 the Town received additional state funding to conduct a Brownfield Area Revitalization Master Plan, which will be completed in Q1 2026. Also in 2024 the Town was awarded an EPA Cleanup Grant for soil

remediation, building demolition, and HBM abatement at the 20 North Main St and 50 Bennett St parcels. This work is currently underway.

Previous remediation/cleanup activities involving petroleum products at the wire mill site have included the following:

- Underground Storage Tank (UST) Removal – By 1992, 15 USTs were removed from the site or abandoned.
- Aboveground Storage Tank (AST) Removal – By 1990, two ASTs were removed from the site.
- Hazardous Waste Removal – By 1990, all drummed hazardous wastes had been removed from the manufacturing area.
- Container Storage Area Closure – Eight less than 90-day hazardous waste storage areas were closed. This included removal of more than 340 hazardous waste drums and decontamination of the storage areas. The closure did not address subsurface soils.
- Interim Corrective Measures (ICMs) – ICMs were completed at a former soil stockpile (SWMU-5) and former soluble oil sump pump (AOC-1). At SWMU-5, impacted soils were removed and disposed off-site. At AOC-1, petroleum-impacted water and soil were removed and the sump was cleaned and closed.

Recent data gap analyses performed by Tighe & Bond conducted in 2022-2025 on behalf of the Town of Redding identified localized areas of soil contamination at the 30 North Main St. Site in the South Mill Area previously used by Gilbert & Bennett for manufacturing operations and paint storage.

Affirmation regarding the disposal of petroleum substances at the site.
The Town of Redding affirms that it has not, at any time, dispensed or disposed of petroleum or petroleum product contamination, or exacerbated the existing petroleum contamination at the site, and has not owned the site when any dispensing or disposal of petroleum (by others) took place, and has taken reasonable steps regarding contamination at the site.

13. Cleanup Authority and Oversight Structure

a. **Cleanup Oversight**:

The Town of Redding has applied to enter the Voluntary Remediation Program (VRP). The property will be remediated according to CT Remediation Standard Regulations (RSRs) of the Regulations of Connecticut State Agencies (RCSA), and the Town will comply with all applicable federal and state laws and ensure that the cleanup project protects human health and the environment. The Town will hire a Qualified Environmental Professional QEP/CTDEP-approved Licensed Environmental Professional (LEP) to generate required cleanup plans and oversee remedial actions. Bid Requests and RFPs will be published in local newspapers and the state procurement website in compliance with local, state, and federal laws, and competitive procurement provisions of 2 CFR §§ 200.317 through 200.327. The Town has policies and procedures in place for the competitive and equitable procurement of any additional scientific, engineering, legal or construction support that may be needed.

Additionally, the Town of Redding will consult with EPA to ensure the cleanup is protective of human health and the environment.

Soil remediation and abatement of contaminated building materials will be conducted by a competitively procured, appropriately licensed remedial contractor pursuant to CT Remediation Standard Regulations 9RSRs adopted by the Commissioner pursuant to section 22a-133k of the Regulations of Connecticut State Agencies (RCSA). Licensed, off-site disposal of contaminated media will be conducted pursuant to the aforementioned regulations and the Connecticut Hazardous Waste Management Regulations [22a-446d]. Additional applicable local, state, and federal regulatory requirements will also be adhered to. Asbestos abatement actions will require notification to and coordinate with the Connecticut Department of Public Health (CT DPH) and will be conducted in accordance with CT DPH rules and regulations.

Cleanup Response Activities: The site is accessible by bordering public roads, and the site is owned by the Town of Redding. No adjacent property access is needed. Communications and outreach will be ongoing, notifying neighboring property owners and the greater Georgetown neighborhood to cleanup efforts and project status. Air monitoring will be conducted along the perimeter of the site during soil remediation. During the HBM abatement, access to a local daycare facility may be desirable to monitor air quality at this site. If deemed necessary, the Town Health Officer will contact the daycare facility management to review the abatement process and duration and will request access to a portion of the site to setup and manage a temporary air monitoring station for the duration of the abatement.

14. Community Notification

a. Draft Analysis of Brownfield Cleanup Alternatives

The Town of Redding provided the community an opportunity to review and comment on the draft application and draft ABCA beginning on January 8, 2026 through January 12, 2026. If the application is selected for funding, the Town will finalize the ABCA and make it available for additional public review and comment as part of pre-cleanup activities.

b. Community Notification Ad

The Town of Redding, through its Board of Selectmen, notified the community of intent to apply for an EPA Brownfield Cleanup Grant at a duly noticed meeting of the Redding Board of Selectmen on December 15, 2025. Subsequently a Legal Notice for a Public Meeting to review and comment on the draft application and draft ABCA were published with the Town Clerk's office and posted to the Town Website (reddingct.gov) and on the Town's official Facebook page on January 5, 2026, and published in the Redding Sentinel (Redding's weekly newspaper) on January 8, 2026, and in the Danbury News-Times on January 7, 2026. Content of the public meeting legal notices clearly stated: a copy of the grant application and draft Analysis of Brownfields Cleanup Alternatives (ABCA) was available for review and public comments, where the draft application was located, and the date, time, and location of the public meeting.

c. Public Meeting

A Public meeting was held on January 12, 2026, at 7:00 pm in the Redding Town Hall Hearing Room. The draft application and ABCA were presented, and the Town solicited comments and questions from community members. The community demonstrated full support and enthusiasm for the project. From the meeting, the Town has included: a summary of the public comments received, the Town's response to those comments, meeting notes, and meeting sign-in participant list.

d. Submission of Community Notification Documents

- A copy of the draft ABCA,
- Copies of the newspaper public notices that demonstrate solicitation for comments on the application and that notification to the public occurred at least 14 calendar days before the application was submitted to EPA,
- A copy of the Town website posting that demonstrates solicitation for comments on the application,
- Summary of comments received,
- The Town's response to those comments,
- Meeting agenda, notes, and
- Meeting sign-in participant list.

15. Contractors and Named Subrecipients

Not applicable

January 9, 2026

Julia Pemberton
First Selectwoman
Town of Redding
100 Hill Road
Redding, CT 06875

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

Dear First Selectwoman Pemberton:

The Connecticut Department of Energy and Environmental Protection (DEEP) acknowledges that the Town of Redding intends apply to the US Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant for Federal Fiscal Year 2026. The Town of Redding plans to use the grant funding to remediate the property at 30 North Main Street in Redding, CT (the Site) that is contaminated with hazardous substances and/or petroleum.

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 Property Transfer Program, (if applicable) pursuant to CGS §22a-134, or the Brownfields Remediation and Revitalization Program pursuant to CGS §32-769. The Site is currently enrolled in the Municipal Brownfield Liability Relief (MBLR) Program CGS §22a-133ii; however please note that the MBLR is not considered a formal remediation program. To perform cleanup work funded by an EPA grant, the Site will need to be accepted into one of the programs listed above.

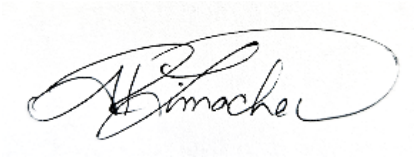
DEEP acknowledges that extensive environmental assessments have been performed on the Site since the 1980s and the receipt of the following reports documenting the environmental condition of the Site:

- Phase I Environmental Site Assessment (ESA) (2022)
- Limited Phase II/III ESA (2024/25)
- Data Gap Analysis
- Hazardous Building Material Data Gap Analysis (2023)
- Analysis of Brownfield Cleanup Alternatives (ABCA) for 20 N. Main parcels: Machine Shop, OMS area, West Pond (for EPA 2024 remediation grant)
- Draft ABCA for 30 N. Main (pre-requisite for 2026 EPA remediation grant application)

DEEP concludes there is a sufficient level of site characterization from the investigations performed to-date for the remediation work to begin at the Site.

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

Sincerely,



Amanda R. Limacher
Brownfields Coordinator

c: Ms. Katy Deng, EPA (via email)