

# Plainfield: A Plan for Progress



## Frequently Asked Questions about the former InterRoyal Mill Site

### Redevelopment Questions

- ***Who owns InterRoyal?***

InterRoyal is an orphan Brownfields site. An orphan Brownfields site is a site where there is known or suspected contamination which poses a threat to the environment or public safety, and where a responsible party is not cleaning up contamination because the responsible party is unable or unwilling to clean up the property or the responsible party is unknown. In the case of InterRoyal, the owner of record is a corporation that no longer exists. Therefore no responsible party can be identified.

- ***Don't they owe a lot of back taxes? Is the Town going to get all that money back?***

The InterRoyal Corporation owes the Town approximately \$750,000 in back taxes. Unfortunately, because the corporation no longer exists, there is no way to recoup these monies. If the Town wishes to see the property cleaned up and redeveloped, it is neither realistic nor fair to expect a new owner to pay the back taxes owed by the former property owner in addition to bearing the costs for site clean-up.

- ***Fixing up InterRoyal is long overdue. Why hasn't anything been done before now?***

In early 2008, an investment group made a presentation to the Town that led to the Town selling the tax liens on InterRoyal to that group. The investment group intended to foreclose on the property and redevelop it. However, the 2008-2009 economic down turn and a loss of investment capital negatively impacted the group's ability to move forward with the project. Under the terms of the Town's agreement with the investor group, the tax liens reverted to the Town and the project was not realized. In 2011 the Town made another attempt to identify resources to complete the environmental assessment of the site and develop a remediation plan and estimated cost. The Town was awarded a \$200,000 Brownfields Assessment Grant from the Environmental Protection Agency (EPA). After working for a year to fulfill legal and grant administration requirements, the Town has completed a rigorous selection process and awarded the site assessment work to BL Companies. Closely overseen by the EPA to assure complete compliance with EPA regulations and procedures, BL Companies will verify the locations of pollution and determine the type and quantity of contaminants that remain. BL Companies will then develop a site remediation plan that meets EPA requirements and generate a cost estimate for that plan.

- ***Is the Town going to buy InterRoyal and fix it up?***

It is not the Town's intention to foreclose on the property for back taxes. As the owner of the property the Town would become liable for any threats to the safety and welfare of the public. What makes better sense for the Town, from both a fiscal and liability perspective is to seek out a qualified private developer and sell the tax liens to that developer for a nominal fee. The developer can then foreclose on the property. The Town will then work with that developer to secure state and/or federal funding to cover as much of the cost of the clean-up as possible.

- ***How long will it take to get InterRoyal back on the tax rolls?***

This is a process that will take years. First, a qualified private developer who is interested in the site must be located. State and federal clean-up funds must be secured through grant and loan programs. The clean-up itself will be a lengthy one. Once the clean-up is complete the developer will need to finalize site plans, secure financing, and go through the permitting process.

- ***Who is going to pay to redevelop the site? How much will it cost?***

State and federal funding may be available to underwrite the cost of the clean-up. The purpose of the current assessment is to determine a cost for the clean-up.

- ***What is the site going to become? Could it be turned into a park or a playground?***

The site has rail access, making it an attractive locale for an industrial or commercial use. The Town's zoning regulations include a floating mixed use zone that would accommodate a project comprised of a mix of housing and commercial uses. The Town will certainly encourage a private developer to incorporate some sort of recreational space into a project, if appropriate, e.g., in conjunction with apartment housing.

## **Public Health and Safety Questions**

- ***Is InterRoyal still a fire & safety hazard?***

The InterRoyal site remains a fire and safety risk to the community. The buildings on the site will continue to deteriorate and be a potential target for arsonists if no pro-active actions are taken. Because there are no utilities on site, such as electrical power to the buildings, the danger from a purely accidental fire is slim. Despite the upgraded security fencing, persons can come and go from the Site virtually undetected. The increased foliage during the summer months hides the movements of unauthorized persons on site. The curiosity factor may entice the adventurous onto the site. An accidental fire as the result of "human hand involvement", or an intentionally set fire of an incendiary nature presents a significant potential life and safety hazard to the area surrounding the Site.

## **Public Health and Safety Questions - continued**

- ***Could the building fall down? What would happen if it did?***

The building is in an advanced state of deterioration, and is in fact, slowly collapsing. A sudden collapse of the entire building is unlikely. If that were to occur, the greatest effect would be to increase the cost for its removal, as the collapse would result in the comingling of potentially hazardous building materials, making it necessary to dispose of much more material as regulated waste as opposed to simple construction debris.

- ***It seems that there are a lot of people in this neighborhood who have gotten sick over the years. I always wondered if it was from InterRoyal.***

People are sometimes concerned about what seems like an elevated number of cancer cases in their neighborhood. The Connecticut Department of Public Health (CT DPH) reports that of the hundreds of cancer cluster inquiries received (from around the state) over the years, only a small handful have resulted in closer study and none of them have been linked to a common environmental cause. More information can be found at <http://www.ct.gov/dph/cwp/view.asp?a=3140&q=514550>.

- ***During the fire, debris was blowing around in my yard. I always wondered if that's why I got cancer a few years later.***

During the 2005 fire, the Connecticut Department of Public Health provided Plainfield residents with asbestos/fire factsheets. The fact sheet indicated that asbestos exposures during/after the fire would be relatively low level and short term. High level, long term asbestos exposures are needed before there are concerns about increased cancer risk. As stated in the fact sheet, there are only two cancers with higher risk after high level, long term asbestos exposure: lung cancer and mesothelioma.

- ***What other health hazards are associated with this site?***

The primary way people could have been exposed to site-related contamination is by trespassing on the site. Based on the limited site data evaluated in 2002, there were not significant exposure concerns that could have caused health impacts. However, the CT DPH did not have a large amount of site data to evaluate in 2002, so this is an uncertainty. New EPA grant-funded project work at the site will determine current site conditions.

- ***What has been done to prevent trespassers from getting on the property?***

InterRoyal is secured by fencing and gates. Warning signs are clearly displayed. The Police Department patrols the area and neighborhood residents have been helpful as well, keeping a watchful eye on the site. However, to guarantee that trespassing will never occur is unrealistic. For instance, in the summer months, when there is dense foliage, it is nearly impossible to detect trespassers on the property.

## **Current Clean-Up Project Questions**

- ***Can the building be salvaged?***

It is not economically feasible to restore any of the buildings on the site, but it may be possible to salvage and/or recycle some of the building materials such as timber, metals and brick. Material salvage could help to offset demolition costs.

- ***How will the site be cleaned up? How will we know it's really safe?***

The site will be cleaned up by first removing the buildings, then addressing contamination in the Site's soil and groundwater. Removal of the buildings will require approval of an Alternate Asbestos Work Plan by the Connecticut Department of Health which will ensure that the building abatement and demolition is performed in a manner that is protective of human health. Cleanup of soil and groundwater will be conducted under a Remedial Action Plan approved by the Connecticut Department of Energy and Environmental Protection (DEEP). Standards for cleanup of soil and groundwater will be performed in compliance with the CTDEEP Remediation Standard regulations. These regulations establish contaminate concentrations limits for soil and groundwater that are protective of human health and the environment.

- ***Will local people be hired to do the work?***

At this point in time it is not known when cleanup of the Site will begin. It is possible that the process for selecting an abatement, demolition and cleanup contractor could include a requirement that they hire local people who are properly trained and qualified to perform the work.

- ***Even if you take down the building, how can you get rid of contamination that's in the ground and the water?***

There are a number of methods by which soil and groundwater contamination can be removed. These methods, which include excavation and disposal of contaminated soil; pumping and treating contaminated groundwater; vacuum extraction of volatile contaminants; or chemical or thermal destruction of contaminants will be determined after the current investigation is completed. It is likely that more than one method will be employed at the site, given the variety of contaminant types.

- ***Could our water be contaminated?***

Groundwater contamination has been identified at the Site during previous investigations. However, the results of those investigations indicate that the plumes of contaminated groundwater are stable and are not migrating. This will be verified during the current investigation.

- ***Why the grant? Doesn't the Town already know where the contamination is?***

Previous investigations have identified up to nineteen Areas of Concern (AOCs) on the Site. However, the last investigation of the Site was completed over 10 years ago. The purpose of the current grant-funded investigation is to verify current Site conditions and use that information to develop the most appropriate methods, and associated costs, to clean up the Site. This information can then be used to support applications for additional grant money to begin site cleanup, or provide prospective developers estimated costs to clean up the Site so that it can be put back into beneficial use.

## **Current Clean-Up Project Questions - continued**

- ***Didn't they take out all the bad stuff when the EPA came years ago?***

EPA has performed several removal actions at the Site. The first action was conducted in 1996 when EPA and the State of Connecticut removed drums of industrial chemicals, cleaned out metal plating vats, removed PCB contaminated transformer oil and pumped out the fuel oil tanks supplying the boiler room. A second removal action took place in 2003 when EPA removed PCB contaminated soil from transformer enclosure areas and asbestos containing roofing material that had blown off the building. A fence was erected around the Site and posted with signs warning that the Site was contaminated. The final removal action was completed in 2006 to clean up contaminated debris from the 2005 fire.

- ***If they start going on the site and disturbing things, how do we know contaminants won't get released into the neighborhood?***

The current investigation of the Site is being conducted under a Health and Safety Plan and an EPA-approved work plan that ensures the work will be performed in a manner protective of human health and the environment. Any work to perform hazardous building materials abatement or building demolition will require Department of Health approval. Remediation of Soil or Groundwater will require approval of a Remedial Action Plan by the Connecticut Department of Energy and Environmental Protection (DEEP).

- ***Could my property be contaminated because of the fire? All this stuff was blowing around. Should my property be tested?***

After the 2005 fire, EPA and DEP workers cleaned up the area downwind of the Mill property that was impacted by fallout from the fire. Seven field crews comprising 35 people worked for two weeks in 12 hour shifts to scour a five mile by one-half mile area north of the mill site and removed fire debris that they identified or that was reported to them. Residents were also informed on how to dispose of any debris they may find. After the fire they also cleaned up on-site debris and soil that contained lead and asbestos. Materials removed included 4,915 tons of brick, 1,582 tons of demolition debris and 49 truckloads of scrap metal. These actions removed significant risks to human health and the environment resulting from the fire.

- ***What else should I be concerned about?***

In its current deteriorated state, the site is not safe for untrained persons to enter. Residents are strongly advised to respect the warning signs on the Site's perimeter fence and should not trespass on the property.

For more information, contact 860-230-3003 or visit [www.plainfieldct.org/plan4progress.asp](http://www.plainfieldct.org/plan4progress.asp)