

# **COMMUNITY INVOLVEMENT PLAN**

# 226 Rubber Avenue, Naugatuck, CT 06770

U. S. EPA Brownfields and Connecticut Department of Energy and Environmental Protection (CTDEEP) Abandoned Brownfields Cleanup (ABC) Program

September 9, 2025

#### **1.0 OVERVIEW**

The Community Involvement Plan (CIP) aims to detail how the Borough of Naugatuck (BON) will address the concerns and needs of residents potentially impacted by the planned environmental cleanup at 226 Rubber Avenue in Naugatuck, Connecticut. This plan sets out the strategies that the Naugatuck Valley Council of Governments (NVCOG), acting on behalf of BON, uses to involve residents, city officials, and local organizations in decisions about the site's environmental remediation. Funding for this CIP is provided by the NVCOG through the EPA Community Wide Assessment Grant #BF00A01460.

Active residents who are involved in neighborhood issues are invaluable to the success of this project, as they possess a deep understanding of the Rubber Avenue project area. The success of the environmental cleanup and future redevelopment of the Site relies on informed citizen involvement throughout each stage of the cleanup process. The proposed reuse of the site is for industrial/commercial use. Achieving successful remediation and redevelopment depends on a process that is transparent, inclusive, and responsive to the concerns of all affected community members. The success of the remediation activities and redevelopment is based on a process that is open and transparent to all affected citizens.

The Borough of Naugatuck will take the lead in notifying and engaging the community throughout the redevelopment project, keeping residents informed about response actions and the use of federal funding for site activities on behalf of the Naugatuck Valley Council of Governments, which is administering the grant.

#### 2.0 SPOKESPERSON FOR INFORMATION REPOSITORY

The spokesperson for this project is James McGrath, Executive Assistant to the Mayor of the BON. He may be contacted at the following:

Borough of Naugatuck
229 Church Street, 4<sup>th</sup> Floor
Naugatuck, CT 06770
(203) 720-7064
JMcGrath@naugatuck-ct.gov
http://www.naugatuck-ct.gov/newhome

The Information Repository is located at the Naugatuck Town Hall at 229 Church Street, Naugatuck, CT 06770 and is available for public viewing Mondays through Fridays, 8:00 am - 4:00 pm. All public meetings will be held at the Naugatuck Town Hall unless otherwise noted. Digital copies of the repository can be viewed on the BON website <a href="http://www.naugatuck-ct.gov/local-news?FeedID=1831">http://www.naugatuck-ct.gov/local-news?FeedID=1831</a>] and the NVCOG website <a href="https://nvcogct.gov/project/current-projects/brownfields/naugatuck-recycling-center-226-rubber-ave/">https://nvcogct.gov/project/current-projects/brownfields/naugatuck-recycling-center-226-rubber-ave/</a>].

## **3.0 SITE DESCRIPTION AND HISTORY**

The Site is a 1.76-acre parcel located at 226 Rubber Avenue in Naugatuck. The BON Assessor identifies the property as Map Block Lot 6.5-40W18 located in a residential district. The site is currently vacant with no structural improvements remaining beyond the asphalt entrance from Andrew Avenue and a guard rail in the central portion of the site dividing the parcel from north to south. The general vicinity includes mixed-use commercial and retail development along Rubber Avenue to the north, east, and west of the property and former industrial property to the south.

The Site was part of the Goodyear's Metallic Rubber Shoe Co. complex from approximately 1887 through approximately 1923. During this time, the western portion of the property was developed with three buildings. Based on historical Sanborn maps, it is assumed that the westernmost building was used for packaging, manufacturing, and

storage. Products were varnished and stored in the central building and the easternmost building was primarily used as storage space. By 1960, the Site was operated by United States Rubber Co., which changed its name to Uniroyal, Inc. in 1967. The operations at the Site appear to have included the use of petroleum-based products, solvents, varnishes, and metals in the manufacturing processes in 1970, Uniroyal, Inc. conveyed the property to the BON, which demolished the buildings by 1972.

From May 1991 through July 2, 2020, the Site operated as the Naugatuck Recycling Center. The center accepted various wastes, including car batteries, antifreeze, scrap metal, motor oil, and motor oil filters. The recycling center was relocated in 2020. Currently, the western portion of the site is being leased to a seasonal flower vendor, and the remainder of the site is vacant.

#### 3.1 Nature of Threat to Public Health and Environment

An All-Appropriate Inquiry (AAI)/ Phase I Environmental Site Assessment, completed by SLR, dated November 2020 identified the following recognized environmental conditions (RECs) also referred to as AOCs at the Site:

- AOC-1: Former Manufacturing Operations
- AOC-2: Former Recycling Operations
- AOC-3: Offsite Groundwater Impacts
- AOC-4: Temporary Storage of Hazardous Waste

Since 2020, the following environmental investigations have been conducted at the Site:

- Phase I Environmental Site Assessment, prepared by SLR dated November 2020
- Phase II Environmental Site Investigation, prepared by SLR dated February 2022
- Soil and Groundwater Investigation, prepared by SLR dated June 2025

The results of the soil and groundwater investigations suggest that soil impacts at the Site (soil samples with concentrations of contaminants that exceed CTDEEP RSR criteria) appear to exist within the central portion of the Site where three samples from the shallow materials contained polynuclear aromatic hydrocarbons (PAH) at concentrations above the RSR criteria, and two samples contained extractable total petroleum hydrocarbons (ETPH) at concentrations exceeding criteria. The presence of the exceeding concentrations of petroleum and PAH compounds in this area could have resulted from a former petroleum-related release, the presence of non-soil fill materials, or may be incidental, as these compounds are commonly found in asphalt and asphalt-related demolition debris.

Arsenic and/or lead impacts were encountered in certain areas along the southern and eastern portions of the Site. Given the widespread presence of urban fill materials observed in soil borings and test pits, the elevated concentrations of lead and arsenic are likely indicative of fill materials rather than an on-site release.

Impacts to groundwater were observed in one monitoring well (MW-3), with RSR exceedances for ETPH, lead, benzene, and xylenes in two sampling events (2021 and 2025). The sewer odor, discoloration, and foam noted in the MW-3 groundwater sample are indicative of a potential leak in an unmarked sewer line in the vicinity and is not presumed to represent a release from former manufacturing operations (AOC-1) or from former recycling center storage (AOC-2). However, to date, no such sewer line has been identified. Groundwater collected from the downgradient monitoring well, MW-5 did not contain any concentrations above the laboratory detection limits. Due to the lack of downgradient groundwater impacts, the contamination detected in MW-3 does not appear to migrate off site.

#### **4.0 COMMUNITY BACKGROUND**

# **4.1 Community Profile**

According to the 2020 United States Census Bureau estimates, the BON has a total population of approximately 31,519 and a population density of approximately 1,934 people per square mile. The area, Census Tract 3453 within the Borough of Naugatuck, has 2,251 households per the 2019 5-year ACS estimates, about 7% of which are single-parent households with children under the age of 18. As of 2019, 20% of the population identifies as Hispanic or Latino, 65% identifies as non-Hispanic White, and 8% identifies as Black or African American. About 6% of the neighborhood speaks Spanish at home.

The area is economically stable and has a median household income of \$67,000 per year which is slightly lower than the Borough median income of \$75,000. The unemployment rate is 3%, and 18% of persons live below the 185% of the federal poverty line. The area unemployment rate is slightly lower than the Borough rate of 4.5% and the poverty status of this area is in line with the Borough overall. The project area has 2,631 housing units. About 54% of occupied housing units are renter occupied. About 38% of housing units in the neighborhood were built prior to 1940. The age of the housing stock in the area may contribute to a vacancy rate of 8.6% which is slightly higher than the Borough overall which is 6%.

# **4.2 Chronology of Community Engagement:**

In 2024, the BON applied to receive funding through the NVCOG FY24 EPA Community Wide Assessment Grant. The BON belongs to the NVCOG's Regional Brownfields Partnership of Western Connecticut. The BON's application was followed by its submission to EPA for review and approval. The application was subsequently approved by the NVCOG Regional Brownfields Partnership Executive Committee in December of 2024.

# **4.3 Key Community Concerns:**

To date, there have been no direct comments to the NVCOG from the public concerning the proposed cleanup. However, NVCOG staff and the Licensed Environmental Professional have been in contact with the Connecticut Department of Energy and Environmental Protection about the cleanup.

The NVCOG will continue to seek public comment and will seek to address any concerns in a timely manner. The Licensed Environmental Professional has prepared an Analysis of Brownfields Cleanup Alternatives/Remedial Action Plan (ABCA/RAP). It will be presented, along with the Community Involvement Plan, at a public meeting. A news release will be issued when the cleanup has begun. The Borough's Office of Economic Development and the NVCOG Board of Directors will be notified of the progress. The materials in the Information Repository will be updated periodically. The public meeting to discuss the cleanup will be held at the Naugatuck Town Hall. Notification of the meeting will be by legal notice and press release. NVCOG will respond to any feedback or comments from the public as part of its continued community engagement process.

## **4.4 Benefit to Targeted Community:**

The greatest benefit to this project is the remediation, redevelopment, and productive reuse of a blighted and vacant site. In addition, the community will no longer be exposed to the risk of on-site contact with the contaminants associated with prior manufacturing activities. The investment by EPA and collaboration with the BON is making it possible to clean up the site. The residents will see a reduction in health risks as a result of remediation efforts. Another Brownfield site will have been returned to productive reuse. The long-standing commitment by the Borough of Naugatuck and the NVCOG to reuse brownfields will result in the complete turnaround of the site yielding an expansion of a local business that will provide more services and part-time and full-time employment opportunities for the surrounding community.

#### **5.0 CONTINUED COMMUNITY INVOLVEMENT**

NVCOG staff will hold a public meeting at the BON Town Hall on **Wednesday, October 22, 2025, at 6PM** to present information on the project. This will coincide with the 30-day public comment period on the ABCA/RAP/CIP, which will begin on **Monday, September 15, 2025**. Among the items on the agenda for this public meeting will be the findings of the ABCA/RAP, the proposed cleanup plan, EPA's Green Remediation Policy, and the redevelopment plan for the site.

Notice of future meetings will be posted at the BON Town Hall, 229 Church Street, Naugatuck, Connecticut where the meetings will be held and on the BON [http://www.naugatuck-ct.gov/local-news?FeedID=1831] and NVCOG websites [https://nvcogct.gov/calendar/] and in a newspaper legal notice in the Republican American. There will be updates, as needed, on the progress of the cleanup, and area residents will have full access to NVCOG's website where updates will also be posted. A news release will be issued when the cleanup is complete. Public comments will be solicited and responded to on an ongoing basis as needed.

Translation services are available upon request.

## **6.0 CIP IMPLEMENTATION AND UPDATES**

The BON will be responsible for implementation of this CIP. This plan will be consulted during the cleanup program at 226 Rubber Avenue to ensure appropriate community involvement and stakeholder engagement. This plan and associated contacts and information will be updated as necessary during the project.