



Precision Plating Superfund Site Community Involvement Plan

**Prepared by CDM Smith for
U.S. Environmental Protection Agency, Region 1**

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List of Acronyms

ACS	U.S. Census Bureau American Community 5-year Summary Survey
ARARs	Applicable or Relevant and Appropriate Requirements
CAG	Community Advisory Group
CT DEEP	Connecticut Department of Energy and Environmental Programs
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
EPA	U.S. Environmental Protection Agency
MHP	Mobile Home Parks
ROD	Record of Decision
TAG	Technical Assistance Grant

Section 1

Introduction

1.1 Purpose and Goals of the Community Involvement Plan

This Community Involvement Plan has been prepared in accordance with federal regulation to outline the U.S. Environmental Protection Agency (EPA) site-specific strategy for informing and engaging community members in the Superfund process. The Community Involvement Plan will help the EPA engage and inform community members, environmental groups, government officials, the media and other interested parties of the investigation and cleanup activities at the Precision Plating Superfund Site (the “Site”).

This Community Involvement Plan will apply to each remedial decision at the Site. It may be supplemented by decision-specific communication strategies as needed. The Community Involvement Plan is a “living” document and will be updated or revised, as appropriate, as Site conditions change.

The Agencies’ goals for the Community Involvement Plan are:

- Provide community members with accurate, timely and understandable information about Site activities that reflects their communication preferences and culture.
- Initiate and support two-way communication between the EPA and community members, including careful consideration of community member comments.
- Ensure community members have opportunities for involvement in a wide variety of Site-related activities.

EPA will achieve these goals through various means, including published documents, public meetings, and community interviews consistent with the action plan (Section 5). These activities will be based on the community’s needs, as informed by information the EPA gathers from local groups and individuals.

The Community Involvement Plan is meant to be user-friendly and understandable to the public and use of acronyms or scientific terminology has been avoided where possible. The plan was written after community interviews were conducted and research concerning community demographics was completed so the content could be tailored to fit the needs of the community. The purpose of the Community Involvement Plan is not to provide technical answers to the community’s questions, but to show how, when and where EPA will provide information the public needs to understand EPA’s work and to show how the stakeholders can be actively involved in the cleanup process.

Guidance documents and other resources used in drafting this Community Involvement Plan include:

- *National Oil and Hazardous Substances Pollution Contingency Plan* (NCP 1994)

- *Superfund Community Involvement Handbook* (EPA 2020)
- *Community Involvement Toolkit* (EPA 2016b)

1.2 Regulatory Authority

The EPA is investigating and cleaning up the Site pursuant to the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) and the National Oil and Hazardous Substances Pollution Contingency Plan, commonly referred to as the National Contingency Plan (NCP 1994).

Congress enacted CERCLA, also known as *Superfund*, in 1980 to address releases or substantial threat of a release of a hazardous substance that may endanger public health or the environment. CERCLA gives the President broad powers to respond to hazardous substance releases and threats of release as the President deems necessary to protect the public health or welfare or the environment, including enforcement authority with respect to parties responsible for the releases. To implement CERCLA, EPA created the National Contingency Plan, which is a set of regulations that detail how CERCLA cleanups are to be conducted, including requirements for community involvement.

At the Precision Plating Superfund Site, EPA is currently conducting a Remedial Investigation to determine the nature and extent of contamination, identify pathways of migration, and assess associated risks to human health and the environment. The purpose of the Remedial Investigation is to collect data necessary to adequately characterize the Site for the purpose of evaluating effective remedial alternatives. Prior actions to remediate contaminated soil and groundwater and mitigate risk, including the 2017 completion of a Time-Critical Removal Action to connect additional properties to the Connecticut Water Company water main, have also been undertaken at the Site. In March 2021, EPA began field activities to address remedial investigation data gaps and will document the findings in a Remedial Investigation Report.

1.3 Project Structure and Roles

The roles of each of the agencies conducting remedial activities at the Precision Plating Superfund Site are described below:

- **EPA.** EPA is the lead agency for at the Site and is responsible for ensuring work is done in accordance with the Superfund law. EPA and its consultants will conduct field activities and prepare documents (work plans, quality assurance project plans, health and safety plans, and various reports on findings). For more information on EPA, visit www.epa.gov.
- **CT DEEP.** Connecticut Department of Energy and Environmental Protection (CT DEEP) is the state support agency for the Site and will provide input to EPA on investigation and cleanup activities, have the opportunity to comment on documents prior to release to the public and participate in planning meetings. For more information on CT DEEP, visit www.portal.ct.gov/DEEP.



1.4 Community Involvement Plan Structure

This Community Involvement Plan provides outreach information for the Site in a single location. The individual sections provide added information on the Site and on concerns expressed to EPA during community interviews.

The Community Involvement Plan is structured as follows:

- **Section 1 – Introduction.** Purpose and goals of the Community Involvement Plan, regulatory authority, project structure and roles, and plan structure.
- **Section 2 – Site Description.** Location and layout, physical description, history, regulatory history to date.
- **Section 3 – Community Profile.** Demographics, community description, and community involvement activities conducted to date.
- **Section 4 – Community Concerns and Issues.** Distillations of issues and concerns heard by EPA in interviews and in other interactions with the public.
- **Section 5 – Community Involvement Action Plan.** Planned outreach activities at the Site.
- **Section 6 – References.** List of references cited for text and figures in this document.
- **Appendices** – Appendix A lists important contact information for EPA, State and local officials and available information repositories.

Section 2

Site Description

2.1 Location and Layout

The Precision Plating Superfund Site source area is located within the Hillside Industrial Park at 1050 Hartford Turnpike, Vernon, Connecticut (see Figure 2-1). Since 1969, Precision Plating Corporation has conducted chromium plating operations within the 3-acre industrial park. Surrounding land use includes residential and commercial properties, including the High Manor Community, to the south, Santini Villa Apartments to the west, residential properties and Bogner Quality Meats to the north, and The Grand Loft community to the east.

The Hillside Industrial Park consist of a complex of three buildings, identified as Buildings 1 through 3, which were developed off a vacant lot in the mid-1960s. The largest of these buildings (Building 1) is occupied, in part, by Precision Plating. Paved access ways and parking areas are located adjacent to the buildings that form the industrial park and provide access to the property. The main entrance is a paved road with access from Route 30 to the northwest side of the property. Surface water runoff from the paved areas surrounding the buildings discharged from roof drains is intercepted by several catch basins that convey flow to four outfalls along a wooded slope at the west side of the building complex.

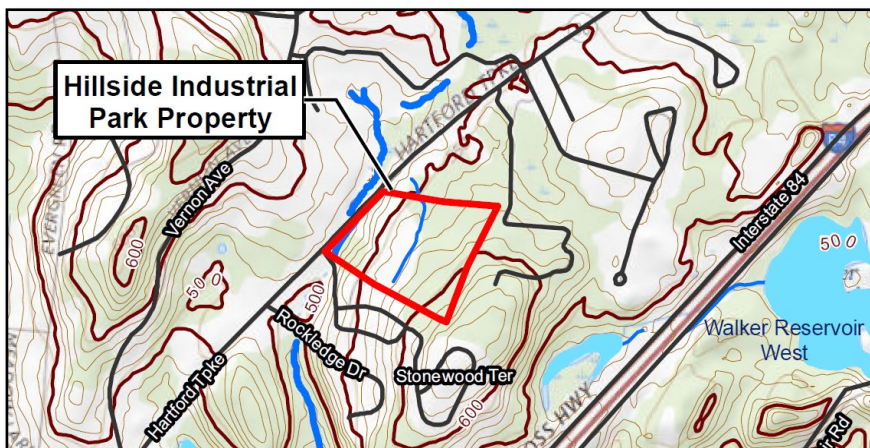


Figure 2-1: Site Location (TRC Draft Remedial Investigation Report, October 2019)

2.2 Physical Description

The Site property is zoned as Industrial and properties in the vicinity of the Site are zoned as Residential, Commercial, and MHP (Mobile Home Parks). The Site is surrounded by a mix of light commercial, residential, and undeveloped land. The property boundary of the Hillside Industrial Park complex is surrounded by undeveloped and heavily vegetated wooded areas. Commercial development is interspersed with residential properties primarily along Route 30 which runs from northeast to southwest immediately west of the Hillside Industrial Park. The High Manor Community abuts the Site to south. Several densely developed residential properties are located further to the south and in the areas to the west, between Route 30 and Vernon Avenue, north and east of the Site.

2.3 Site History

The Hillside Industrial Park was developed in the 1960s on previously undeveloped property and initially included Building 1 and 2. Building 1 was subsequently expanded and Building 3 was constructed in the early 1970s.

Precision Plating was one of the first tenants in Building 1. Precision Plating is a small, metals finishing facility that has operated from 1969 to the present, chrome plating various metal parts and fixtures. The plating process includes alkaline cleaning, chemical etching, rinsing, buffing and polishing. Wastes generated during this process include rinse waters containing heavy metals, batch wastes of alkaline cleaner, and spent plating and etching acids.

Process wastewater generated by Precision Plating during the period between 1969 and approximately 1975 was discharged into a drainage ditch east of Building 1 and to a storm drain on the south side of the building with minimal to no treatment other than the reported neutralization of waste in the former lagoon. Waste was also improperly stored outside the building resulting in documented releases in 1979. In addition, approximately 35 gallons of sodium hydroxide, hydrochloric acid and water were spilled near the northeast corner of Building 1 in 1991.

Waste management and operational practices were identified as a concern by the Connecticut Department of Health and CT DEEP as early as 1975. Subsequent state and federal involvement ultimately resulted in the inclusion of the Site on the National Prirties List in 1989 and the EPA taking responsibility as the lead agency. EPA's Remedial Investigation/Feasibility Study began in May 2012 and is currently ongoing. Figure 2-2 depicts the general layout of features, release areas and prior remedial activities at the Hillside Industrial Park.

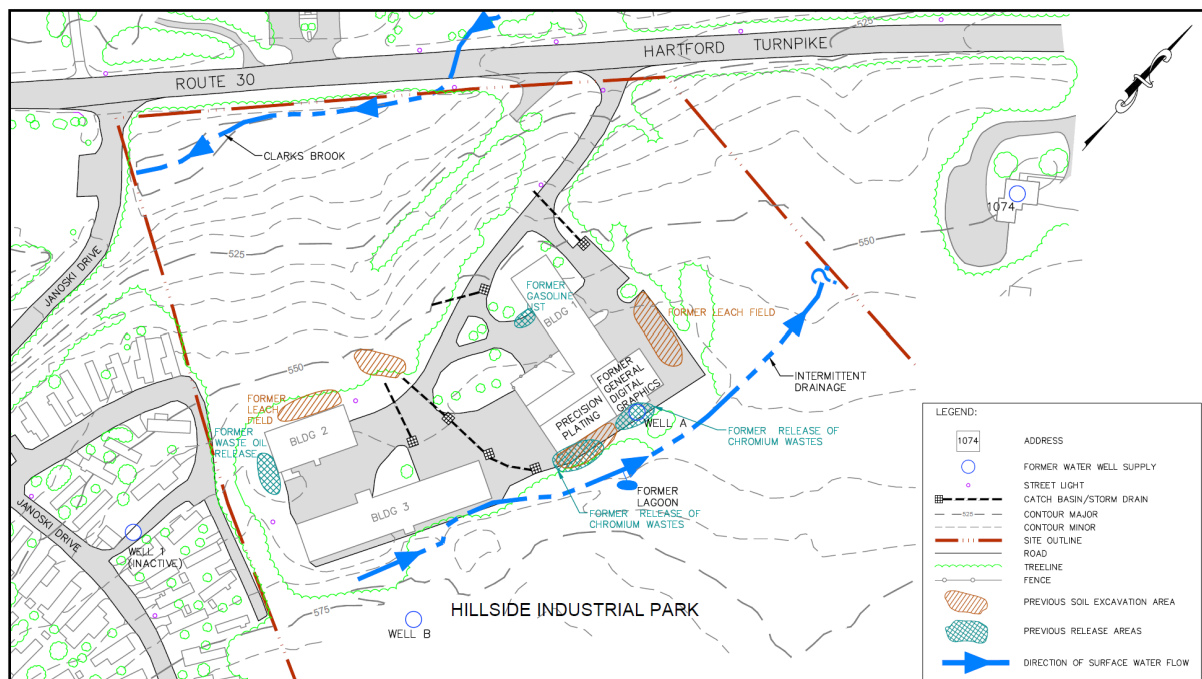


Figure 2-2: Site Features (AECOM/TRC Field Sampling Plan, February 2017)

2.4 Regulatory Involvement to Date

The following provides a brief summary of significant regulatory activities and documentation associated with the Site. Numerous investigations have been conducted at the Site since 1979 and significant remedial actions are also outlined below.

- **1975** - The Connecticut Department of Health conducted an inspection of the plating operations, tanks outside Building 1 were filled to the top with plating wastewater, which resulted in the state issuing a letter outlining the requirements for a waste treatment system and requiring the submittal of an engineering report of construction plans and specifications.
- **1979** - An aboveground storage tank and three 55-gallon drums containing chromium waste were damaged behind the Precision Plating building, releasing their contents. Vernon's Health Department found that the well serving the Hillside Industrial Park was contaminated with hexavalent and trivalent chromium. The rupturing of drums and a storage tank by a snowplow was a likely source of contamination. The company, and later EPA, confirmed that groundwater underlying the Site had become contaminated.
- **1985** - A replacement supply well for the Hillside Industrial Park, as well as nearby residential production wells, are confirmed to exhibit Site-related contaminants.
- **1982 & 1986** - The state issues orders to investigate and perform cleanup activities including excavation contaminated soil, installation of monitoring wells, and providing potable water to affected residences. In response, five shallow monitoring wells installed, surface water is sampled, 20 cubic yards of contaminated soil is removed, and alternate drinking water is supplied to the High Manor Community.
- **1989** - The Site was listed on EPA's National Priorities List of Superfund sites.
- **1992** - A limited groundwater treatment system was placed in operation to clean up contaminated groundwater in the immediate vicinity of the soil removal area. That system is no longer operational. Connection of the Hillside Industrial Park and abutting Mobile Home Community to a public water supply is completed.
- **1998** - EPA entered into an enforcement agreement with the CT DEEP in which the state agreed to take the lead on site management.
- **2002** - An investigation into the nature and extent of contamination at the Site began in October under CT DEEP authority.
- **2011** - The enforcement agreement is mutually terminated and the Site is moved to federal lead.
- **2012** - EPA began its Remedial Investigation. The iterative Remedial Investigation included three primary phases completed between approximately 2012 and 2013, 2014 to 2016, and 2017 to 2019.

- **2015** - An action memorandum for a Time-Critical Removal Action was signed that authorized EPA to provide bottled water to affected residential and commercial properties at the removal Site. The action memorandum was amended in 2016 with a provision of an alternative water supply to select properties. Five affected properties were subsequently connected to the Connecticut Water Company water main within Hartford Turnpike.
- **2021** - EPA begins additional data collection to address Remedial Investigation data gaps.

EPA is currently investigating the nature and extent of contamination, contaminant migration pathways, background conditions, and risks to human health and the environment. Once additional sampling is complete, EPA will complete a Remedial Investigation Report. The Remedial Investigation Report provides a detailed summary of the nature and extent of contamination and the risks to human health and the environment those contaminants pose. This information will be used to determine a range of potential cleanup options to address the risks posed by the Site. This information will be summarized in a Feasibility Study Report.

Section 3

Community Profile

This section includes a profile of Vernon, Connecticut, the community in which the Precision Plating Superfund Site is located. Demographic data presented were obtained from on-line resources, as noted. A description of community outreach activities conducted to date is also provided.



Figure 3-1 Location of Vernon,

3.1 Demographics

Precision Plating is in Tolland County, one of the least populous counties in Connecticut (149,788 as of the 2020 census). The U.S. Census Bureau estimated a slight increase (approximately 0.3%) in population by 2021. Tolland County is comprised of 13 towns and shares a border with Massachusetts and with three other counties in Connecticut (Figure 3-1). Connecticut does not have county-level governments, as legal power is vested in the state, city, and town governments.

Vernon, Connecticut is at the border between Tolland and Hartford counties, with an estimated population of approximately 30,000. Vernon sits at an estimated elevation of 350 feet above mean sea level and has a land area of approximately 17.7 square miles. Vernon was incorporated as a separate township in October 1808. The town was incorporated in 1889 and consolidated with the Town of Rockville in 1965. The nearest town of greater than 50,000 people is nearby Manchester, Connecticut. Vernon operates under a mayor-town council form of government. The mayor is elected at large for a term of two years. The town council has 11 elected members (two-year terms) and meets on the first and third Tuesdays of each month.

Demographics for Vernon were obtained from the U.S. Census Bureau (www.census.gov) and EPA's EJSCREEN (www.epa.gov/ejscreen) environmental justice mapping and screening tool, unless otherwise noted, and are summarized below.

- **Population** - Vernon had a population of 30,125 in 2021, which represents an increase (approximately 3.2%) over the 2010 population count (29,183). The estimated population density (per square mile) within a 1-mile radius of the facility is approximately 2,036 (EJSCREEN Census 2010 Summary Report) to 2,154 (EJSCREEN American Community Summary Survey [ACS] 2015 - 2019), with an estimated 2,952 to 3,165 households.
- **Age** - The median age in Vernon is 40.2 years, which is about the same as that of Connecticut as a whole (39 years) (www.city-data.com). The age distribution within a 1-mile radius of the Precision Plating facility is approximately 81% to 82% greater than 18 years of age and 15% to 18% greater than 65 years of age (EJSCREEN 2010 and 2015-2019).

- **Gender** - The population of Vernon is approximately 52.2% female and 47.8% male(www.city-data.com). The population within a 1-mile radius of the facility is consistent, with approximately 52% female and 48% male according to the 2015 to 2019 EJSSCREEN ACS estimates.
- **Race** - Residents of Vernon are 72% white (alone), 15% Hispanic or Latino, 6% Non-Hispanic Asian (alone), and 7% Black or African American (alone). Foreign born persons make up roughly 11.3% of the population. A higher percentage of the population (approximately 77% to 82%) is white within a 1-mile radius of the Precision Plating facility.
- **Languages spoken** - English is the most common language spoken in the home (approximately 84%) within a 1-mile radius of the facility per the 2015 to 2019 EJSSCREEN ACS estimate. This is generally consistent with Vernon as a whole.
- **Income** - Estimated per capita income in Vernon was \$44,657 (2019) and the median household income was \$73,718. This is below the median county (\$87,809) and state (\$78,833) incomes (www.city-data.com). Roughly 9.7% of the population is below the poverty line.
- **Employment** - Unemployment is low (7.2% in 2020) and roughly the same as for the state (www.city-data.com). The most common occupations are reported as: finance, healthcare, educational services, accommodations and food services, transportation equipment, and construction.
- **Housing** - The owner-occupied housing rate in Vernon is approximately 51.5% in (2016 – 2020); however, the owner-occupied housing rate is slightly lower (approximately 40% to 45%) within a 1-mile radius of the facility. The estimated median value of a home in Vernon is \$211,600 (2016 – 2020), well below the median value of a house in Connecticut (\$279,700) for the same time period. Median gross rent in Vernon was \$1,170 (2016 – 2020).
- **Education** - For those 25 years of age and over (2016 – 2020), 93.6% have a high school diploma and 36.4% have a bachelor’s degree or higher. Vernon has five public elementary schools (Lake Street, Maple Street, Northeast, Center Road and Skinner Road), one middle school (Vernon Center), and one high school (Rockville High). There are approximately 3,100 students reported in the public system. There are seven colleges or universities with over 2,000 students within a 15-mile radius of Vernon.
- **Services** - Vernon has one public library, the Rockville Public Library located at 52 Union Street, five fire stations, three parks, seven lakes and reservoirs, 20 grocery stores, 97 restaurants, and 33 gas stations (www.city-data.com).
- **Connectivity** - Approximately 92.8% of homes in Vernon have a computer (2016 – 2020) and 85.5% have a broadband internet subscription.

3.2 Community Involvement History

The state and federal agencies have conducted a variety of community involvement activities to date at the Precision Plating Superfund Site to enhance engagement and meet regulatory requirements. These include but are not limited to:

- **Agency Contacts** - EPA has maintained one or more designated spokespersons to inform the community of actions taken, respond to inquiries and provide information concerning the release of hazardous substances. These individuals include the Remedial Project Manager and Community Involvement Coordinator (see Appendix A for full contact information).
- **Community Engagement** - EPA has, as needed, engaged residents impacted by Site-related contaminants and updated local government elected and appointed officials. EPA has coordinated property access for investigation and remediation activities, developed fact sheets, and engaged directly with community members and local officials.
- **Website** - EPA maintains a website for the Precision Plating Superfund Site at www.epa.gov/superfund/precision. The website includes information regarding current Site contacts, cleanup activities, news releases, and publicly available documents related to the Site.
- **Information Repository** - EPA has established an information repositories that can be accessed at:
 - **Rockville Public Library**
52 Union Street
Vernon, CT 06066
(860) 875-5892
 - **U.S. EPA Region 1
SEMS Records and Information Center**
5 Post Office Square, 1st Floor
Suite 100 (mail code: 01-5)
Boston, MA 02109-3912
(617) 918-1440

The information repositories are maintained online and contain basic information for public review, documents about Site activities, technical documents, this Community Involvement Plan, and general information about the Superfund program. The repositories can be found online at www.epa.gov/superfund/precision or accessed at the Rockville Public Library.

Section 4

Community Needs, Questions and Concerns

To better understand the community's interest in the Precision Plating Superfund Site, EPA solicited input from local community members, officials, and stakeholders in August/September 2021. Interview findings were supplemented with information gathered during prior interactions between the Agencies and the community.

The following provides a summary of the community interviews and key community needs, question and concern specific to the Precision Plating Superfund Site.

4.1 Summary of Community Interviews

In August 2021, EPA met with Town officials to learn about their concerns relating to the Precision Plating Superfund Site and the community's level of interest in the Site. The officials shared that they had seen limited community interest in the Site. Community interest may have diminished in recent years as result of the Site's long regulatory history (State involvement dates to the 1970s), limited single-family residences near the Site and recent communications. In June 2021, EPA distributed a Site Update Fact Sheet to more than 1,000 owners/occupants and businesses proximate to the Site. The Fact Sheet noted that the development of a Community Involvement Plan was among EPA's next steps at the Site. Subsequently, in September 2021, EPA mailed letters to residents and businesses located proximate to the Site soliciting participation in the development of the Community Involvement Plan.

The recipients' responses seemingly confirmed the current degree of community interest is limited, with five of respondents expressing interest in participating in developing this Community Involvement Plan. EPA subsequently attempted to coordinate interviews with each of the respondents. Three respondents agreed to be interviewed, with the discussions focusing on existing Site knowledge (e.g., familiarity with the Site history and contamination), communication, concerns, and future use of the Site. EPA used the information gained throughout the community engagement process to create this Community Involvement Plan. EPA is grateful for the community's participation.

4.2 Key Community Needs, Questions and Concerns

Community concerns expressed to EPA focused on the following general categories:

- Human Health and Risks to the Public;
- Approach and Timing of Remediation;
- Property Value; and
- Future Site Use/Reuse.

The following provides a summary of the above noted primary concerns raised by the community based on prior information gathering and the recent interviews.

Human Health and Risks to the Public

The Town's highest priority is the health and safety of Vernon's community members. The Town expressed an ongoing priority of understanding the Site conditions as EPA's remedial process advances and the protection of the public, particularly those near the source area and downgradient of the footprint of groundwater contamination. This is best achieved through an open and collaborative relationship with EPA.

Although much of the community surrounding the Hillside Industrial Park has access to the Connecticut Water Company system, there are areas that rely on private well drinking water supplies. Owners and residents proximate to the Precision Plating Superfund Site primarily expressed concerns related to the presence of private drinking water wells and safety associated with drinking the water. Clarification was also provided to those residents serviced by the Connecticut Water Company system, which is not impacted by the Precision Plating Superfund Site.

Approach and Timing of Remediation

The timeframe for implementation and completion of remediation was a commonly expressed concern by both the Town and community members. Although general awareness of past remedial actions (e.g., soil removal, groundwater pumping and treatment system operation, EPA's water main connection/extension, etc.) at the Precision Plating Superfund Site varied, the sentiment that the Site has a lengthy regulatory history and the public would like to see the Site cleaned up was stated by several members of the community.

The Town and community also voiced interest in understanding what the remedial approach will be, how long the clean-up will take, what the impacts the remediation will have on the community, and how the Hillside Industrial Park will be used or redeveloped in the future.

Property Value

Concerns were raised during the interview process regarding the potential for the presence of a local Superfund Site and migration of contamination, particularly to potential downgradient locations, to have detrimental impacts on property values. Furthermore, should the contamination migrate further, concerns were expressed regarding how negative impacts to property value would be mitigated.

Future Site Use/Reuse

A significant interest in the future and beneficial use of the Site was consistently voiced by both the Town and community members. This includes seeing the Hillside Industrial Park brought back onto the tax assessment rolls and under productive use.

In general, a desire for flexibility was expressed for the future use of the Precision Plating Superfund Site. This includes support for potential residential use, ongoing commercial/light industrial use, municipal use, agricultural use (e.g., livestock) and the reestablishment of nature conditions (e.g., forested with reestablished wildlife habitat). The Town is a "built-out" community, meaning that a small percentage of the land designated for housing is currently undeveloped, so residential use is of interested to the community. The Town also currently has a shortage of industrial land; however, that does not necessarily correlate to a desire for continued

or expanded industrial use in the future. The timeframe for remediation will be an important factor, as certain uses may be more or less desirable based on the remediation schedule.

Town and community members also voiced a desire to better understand the plans for remediation to support more fully formed opinions regarding reuse or redevelopment.

4.3 Response to Community Concerns

Concerns raised during the interview process were addressed on an individual basis as they generally involved clarification of the drinking water source (e.g., Connecticut Water Company system) or prior private well results, which are not described herein for privacy purposes.

Section 5

Community Involvement Action Plan

This section describes the specific activities and resources the EPA will use to help the community be actively involved in the cleanup process. Considering the information gathered and level community interest in the Site (Section 4), EPA has developed a focused community involvement program designed to meet the requirements of the National Oil and Hazardous Substances Pollution Contingency Plan while addressing community concerns.




An important objective of a Community Involvement Plan is to ensure that community members and others are aware of their opportunities for involvement in response action selection and implementation activities, including understanding how EPA got to that point in the process. The following action plan provides a blueprint for the work that EPA intends to implement based on the currently understood outreach needs of the community. However, the action plan is a living document that may change as work progresses.

Dates and times for community involvement activities are not specified to allow for flexibility in addressing community needs and interests; however, a summary of general timeframes for various coordination activities is provided in Table 5-2.

Whenever EPA begins work on a site, it identifies at least one point of contact for community issues or concerns. The two principal points of contact for the Precision Plating Superfund Site are the Remedial Project Manager and Community Involvement Coordinator (see Appendix A).

5.1 Planned Actions

Planned actions have been organized into three categories: face-to-face, written materials/news media, and electronic (Table 5-1) and are described below.

Face-to-Face	Written Materials/News Media	Electronic
<ul style="list-style-type: none"> Public meetings/open houses Open communication with key stakeholders Community networking Briefings of elected officials 	<ul style="list-style-type: none"> Community Involvement Plan Fact sheets and other materials Advertisements and notifications Press releases Project technical documents 	<ul style="list-style-type: none"> Repositories Websites Email group Social media 

5.1.1 Face-to-Face Interactions

These interactions are meetings or other exchanges between EPA and the community/stakeholders. They are effective in educating and fostering relationships that increase trust and understanding about work being conducted.

These interactions include:

- Public meetings/Open houses
- Briefings of elected officials
- Open communication with key stakeholders
- Community networking
- Community Advisory Group (CAG) meetings

Public Meetings/Open Houses

EPA will sponsor public meetings/open houses as requested by the community and at various milestones throughout the Superfund process. These meetings may be held in-person or virtually. Meetings will be held at times and days that are judged to be the most convenient for residents and business owners (with community input). The public meetings are organized to convey Site information through presentation and discussion. Handouts and visual aids will be used to explain topics. Advance notice will be provided in the local newspaper(s), the Site's website, in meetings, via emails, and through partner organizations.

When needed, EPA provides an interpreter at its community meetings and translates its fact sheets. Currently, no populations needing translation have been identified.

Briefings of Elected Officials

Briefings for elected officials will be held to communicate significant events during the Superfund process. These briefings will keep leaders involved and informed on progress and will provide an opportunity for questions or resolution of concerns. Briefing packages may also be provided to assist officials in responding to public inquiries.

Open Communication with Key Stakeholders

EPA will coordinate with key stakeholders to keep them informed of project activities and obtain feedback on their concerns, as necessary. This process will foster communication and clarify roles. Stakeholders will help disseminate information to groups with whom they are associated. Communication efforts may include small group meetings to stay in touch and periodic one-on-one conversations. These relaxed settings will provide an atmosphere conducive to maximizing two-way communication. EPA will rely on input from the stakeholders as to how often to meet.

Community Networking

Additional networking activities that may be considered at the request of the community include:

- Partnering with environmental and civic organizations to announce project updates, meetings and community involvement opportunities.

- Engaging local agencies to share information about Site work that may impact their jurisdictions.
- Partnering with existing programs of public education such as local schools, community organizations, and youth organizations.

Community Advisory Group (CAG)

A CAG is a self-forming, self-governing stakeholder group that meets periodically, but regularly, to learn about EPA's cleanup process, discuss their issues and concerns, and provide feedback to EPA. EPA is able to provide support to the CAG by attending the meetings, making presentations, procuring a meeting room, advertising the meetings and providing copies of cleanup documents; however, CAGs are not decision making bodies.

Interested community members may contact Darriel Swatts (EPA Community Involvement Coordinator) for more information regarding CAGs.

5.1.2 Written Materials/News Media

Written materials include a variety of tools that may help to expand understanding and engagement, as well as address the concerns identified in Section 4 (as appropriate). Written materials include the following:

- Community Involvement Plan
- Fact sheets and other materials
- Advertisements and notifications
- Press releases
- Project technical documents

Community Involvement Plan

This Community Involvement Plan is a living document that will be reviewed periodically to ensure it is up to date. If necessary, additional community interviews will be conducted and the plan will be revised with additional pertinent information.

Fact Sheets and Other Materials

EPA will continue to prepare written materials specific to the Site to increase community awareness and knowledge of the Site and its status. These may include topic-specific handouts or posters for meetings and other events.

All materials will use language that is understandable to an audience that is not trained in environmental issues, with graphics and text that are as non-technical as possible. Content may include updates on the Site status, listings of recent documents, names of individuals to contact for more information, and descriptions of study techniques or technologies, and the achievement of Superfund milestones.

EPA will keep in mind the information learned during the interviews when developing these materials. Key points from those interviews are captured in Section 4-2.

Mailing List

EPA maintains a mailing list for distribution of fact sheets and meeting notices. To be added to the list, please contact Darriell Swatts (EPA Community Involvement Coordinator).

Advertisements and Notifications

Advertisements and notifications will be placed in the local newspaper(s) as documents become available for public review and at opportunities for public meetings arise.

Press Releases

EPA will provide news releases, as needed, and develop media contacts with the local newspaper. Media briefings can also be arranged if needed.

Project Technical Documents

EPA will work with the CT DEEP to provide a clear path for stakeholder engagement on technical documents. This effort will include providing:

- Identification of documents that will be available for public review.
- Links to electronic copies of the documents (hardcopies can be mailed upon request).
- Clear direction on what input is needed, how it should be provided and when it must be received.

Significant technical documents that will be developed over the course of the Superfund cleanup process include, but are not limited to:

- **Remedial Investigation Report** - The overall purpose of the Remedial Investigation is to adequately identify the nature and extent of contaminants, migration pathways of the contaminants, and potential threats to human and ecological receptors sufficient to evaluate effective remedial alternatives.
- **Human Health Risk Assessment** - This document provides a qualitative and quantitative evaluation of the current and potential risks posed to human health by the presence of Site contaminants. Risk assessments evaluate both the carcinogenic risks and noncarcinogenic risks to human health from Site contaminants.
- **Ecological Risk Assessment** - This document provides a qualitative and quantitative evaluation of the current and potential risks posed to ecological receptors from exposure to Site contaminants.
- **Feasibility Study** - A report that identifies cleanup objectives and alternatives to meet those objectives, and evaluates each alternative using the first seven of EPA's nine criteria which are: protection of human health and environment; compliance with applicable or relevant and appropriate requirements (ARARs); long-term effectiveness and permanence; reduction of toxicity, mobility or volume through treatment; short-term effectiveness; implementability; cost; state acceptance; and community acceptance. The evaluation of State and community acceptance criteria is completed after the receipt of public comments during the 30-day comment period for the Proposed Plan. Sometimes the Feasibility Study

is supplemented by field experiments called Treatability Studies, where certain techniques or technologies are tested at a reduced scale in the field or in laboratories.

- **Proposed Plan** - When EPA is ready to formally propose a cleanup plan, it generates a Proposed Plan (see below).
- **Record of Decision (ROD)** - A public document that explains which cleanup methods, actions, tools and/or techniques will be used at the Site, including the residual contamination levels (if any) and any restrictions on future land use (where waste is left in place).
- **Remedial Design** - The development of engineering drawings and specifications for a site cleanup. This phase follows the Remedial Investigation/Feasibility Study.

Proposed Plan

The Proposed Plan summarizes the contamination that has been found, compares the various ways that the contamination can be cleaned up, and identifies one preferred alternative that EPA thinks balances all considerations. This is the most important time for community input. EPA distributes the Proposed Plan to its email list (hardcopies can be mailed upon request), adds the document to the Site's website, holds a minimum 30-day public comment period, and conducts a public meeting where the Proposed Plan is discussed and public comments are received.

Responsiveness Summary for the Proposed Plan Comment Period

When EPA makes a final decision about which cleanup methods it will use, it creates a document that explains how it has addressed the public comments that were received. This document is called a Responsiveness Summary and it is a part of EPA's decision document called a Record of Decision (ROD).

Comment Periods

EPA holds a public comment period for certain documents. The comment periods may be announced in several ways, including in a local newspaper, a website update, an announcement at a public meeting or through the email list.

Technical Assistance Grant (TAG)

A TAG is a federal grant awarded to an incorporated nonprofit organization of community members affected by the site. It is used to fund an environmental professional to provide an independent technical review of cleanup documents. A grant is available to help the community understand technical information about their site.

A TAG has not yet been awarded at this site. Interested community members may contact Darriel Swatts (EPA Community Involvement Coordinator) for more information.

5.1.3 Electronic Media, Repositories and Administrative Record

The last category of outreach tools identified in this action plan is electronic media, including websites, an email list, and information repositories.

Websites

The primary website related to the Precision Plating site is:

- www.epa.gov/superfund/precision

EPA will continue to ensure the Precision Plating Site Profile website is up to date.

Email List

EPA maintains an email list for distribution of information on the Site. To be added to the list, please contact Darriel Swatts (EPA Community Involvement Coordinator).

Administrative Records and Information Repositories

The administrative record holds the documents that EPA considers or relies upon in selecting the response action at a Superfund site. Administrative records are kept online and can be accessed anywhere with an internet connection. Community members can access the following locations to review the online materials:

- **Rockville Public Library**
52 Union Street
Vernon, Connecticut 06066
(860) 875-5892
- **U.S. EPA Region 1
SEMS Records and Information Center**
5 Post Office Square, 1st Floor
Suite 100 (mail code: 01-5)
Boston, Massachusetts 02109-3912
(617) 918-1440

The information repositories contain documents useful to the public such as: Community Involvement Plan, fact sheets, work plans and reports, proposed plans, Record of Decision, and other materials (e.g., information sheets, notices).

5.2 Coordination of Community Involvement Activities

The Superfund process for remedial actions includes:

- A Remedial Investigation to determine the nature and extent of contamination; identify pathways of migration; and assess associated potential risks to human health and the environment in support of the evaluation effective remedial alternatives.
- A Feasibility Study evaluating cleanup alternatives.
- A Proposed Plan that identifies the preferred remedial alternative.
- A final decision document in the form of a ROD.

Superfund law requires certain community involvement activities be taken at each step of the Superfund process (Table 5-2). Additional community involvement activities may be undertaken to ensure active and meaningful engagement of all stakeholders with an interest in the cleanup.

This Community Involvement Plan will be applicable to all the actions that may take place at the Precision Plating Superfund Site and will guide community involvement activities throughout investigation and cleanup. EPA may supplement this Community Involvement Plan with decision-specific communication strategies, as needed.

Table 5-2 summarizes the significant phases of the Superfund process and the associated required and potential community outreach that may be conducted by EPA.

Table 5-2: Summary of CERCLA-mandated & Potential Outreach Activities	
When (Phase)	Community Involvement Action
Throughout the Superfund Process	<ul style="list-style-type: none"> ▪ Ensure EPA website is updated with the latest information ▪ Prepare fact sheets on site progress ▪ Use written materials and meetings to address the issues raised by the community (Section 4) ▪ Hold a public meeting/open house ▪ Brief elected officials as needed
Remedial Investigation/ Feasibility Study	<ul style="list-style-type: none"> ▪ Establish information repository and an administrative record. Publish notice of availability information in a local newspaper ▪ Conduct community interviews ▪ Prepare a Community Involvement Plan ▪ TAG notification
Remedial Investigation/ Feasibility Study Completion & Proposed Plan	<ul style="list-style-type: none"> ▪ Publish a notice for the Proposed Plan in a local newspaper ▪ Prepare a fact sheet that summarizes the Proposed Plan and describes where the plan can be obtained and the time and location of the public meeting ▪ Make the Proposed Plan and supporting information available in the administrative record ▪ Provide for a public comment period of at least 30 days for written and oral comments ▪ Conduct a public meeting at or near the site during the public comment period ▪ Have the meeting transcribed and make transcript available in the administrative record
After Proposed Plan comment period	<ul style="list-style-type: none"> ▪ Prepare written summary of significant comments and EPA's response to each (Responsiveness Summary) and make it available with the ROD
Record of Decision	<ul style="list-style-type: none"> ▪ Publish a notice of availability for the ROD in a local newspaper ▪ Make ROD available for public comment ▪ Review and revise Community Involvement Plan (if necessary) ▪ Prepare a ROD fact sheet ▪ Pre-ROD significant changes require public notice, public comment period, public meeting and a Responsiveness Summary
Remedial Design/ Remedial Action	<ul style="list-style-type: none"> ▪ Issue fact sheet on the Remedial Design ▪ Hold a public meeting at the completion of the Remedial Design and prior to the Remedial Action (as appropriate). ▪ Revise the Community Involvement Plan if further activities are needed during the Remedial Design/Remedial Action ▪ Issue a fact sheet on the Remedial Action
Operation & Maintenance	<ul style="list-style-type: none"> ▪ Five-year review ▪ Make five-year review results summary available in information repository
National Priorities List Deletion	<ul style="list-style-type: none"> ▪ Federal Register notice announcing intent to delete ▪ Issue public notice ▪ Provide for a public comment period ▪ Prepare a written summary of significant comments and EPA's response to each (Responsiveness Summary) ▪ Add deletion docket to information repository ▪ Hold ceremony or event to commemorate completion and recognize community members
<p>Bold text is outreach mandated by CERCLA Black text is additional outreach that may be proposed and/or conducted by EPA</p>	

Section 6

References

EPA. 2019. *Community Involvement Toolkit*, www.epa.gov/superfund/community-involvement-tools-and-resources.

EPA. 2020. *Superfund Community Involvement Handbook*, <https://semspub.epa.gov/work/HQ/100002505.pdf>. March 2020.

EPA. 2021. EJSSCREEN: Environmental Justice Screening and Mapping Tool, <https://www.epa.gov/ejscreen>

NCP. 1994. *National Oil and Hazardous Substances Pollution Contingency Plan*, 40 C.F.R. Part 300, www.gpo.gov.

U.S. Census Bureau. 2020/2021. Census Information. Accessed at: www.factfinder.census.gov/faces/nav/jsf/pages/index.xhtml.

Appendix A

Important Contacts

U.S Environmental Protection Agency Region 1 (New England)

- **Jeff Saunders, Remedial Project Manager**, (617) 918-1352, saunders.jeffry@epa.gov
- **Darriel Swatts, Community Involvement Coordinator**, (617) 918-1065, darriel.swatts@epa.gov

Connecticut Department of Energy and Environmental Programs

- **Jeffrey Brais**, (860) 424-3705, Jeffrey.Brais@ct.gov
- **Kevin Neary, Project Manager**, (860) 424-3947, kevin.neary@ct.gov

Local Officials

- **Office of the Mayor**
Vernon Town Hall
14 Park Place, Third Floor
Vernon, CT 06066
(860) 870-3600
- **Town Administrator**
Vernon Town Hall
14 Park Place
Vernon, CT 06066
(860) 870-3670
- **Town Council**
Town Council Chambers
14 Park Place, Third Floor
Vernon, CT 06066
(860) 870-2370

North Central District Health Department (NCDHD)

- **NCDHD Vernon Office**
375 Hartford Turnpike, Room 120
Vernon-Rockville, CT 06066
(860) 872-1501

Administrative Records

- **Rockville Public Library**
52 Union Street
Vernon, CT 06066
(860) 875-5892

- **U.S. Environmental Protection Agency, Region 1
SEMS Records and Information Center**

5 Post Office Square, 1st Floor
Suite 100 (Mail Code: 01-05)
Boston, MA 02109-3912

To request copies of administrative record documents, please call (617) 918-1440.