

# **Community Relations Plan**

**Former Vermont Tissue South  
1514 North Bennington Road (Route 67A)  
Bennington, Vermont**

**July 26, 2011**



111 South Street, Suite 203, Bennington, VT 05201 (802) 442-0713 (802) 442-0439 fax

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July 26, 2011

**Subject: Community Relations Plan  
Former Vermont Tissue South, Bennington, VT**

On behalf of the Bennington County Regional Commission (BCRC), enclosed for your use is a copy of the Community Relations Plan for the former Vermont Tissue South Parcel located at 1514 North Bennington Road in Bennington, Vermont. This project is being funded by EPA Brownfields Assessment funding through BCRC's Brownfields Environmental Assessment Program (EPA grants #BF96131501 and #BF97186601 ).

Please do not hesitate to contact me at (802) 442-0456 if I can provide clarification or additional information regarding the Community Relations Plan.

Sincerely,

Jim Henderson  
Bennington County Regional Commission

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## **1. OVERVIEW OF THE COMMUNITY RELATIONS PLAN**

The purpose of this Community Relations Plan is to describe the strategy to address the needs and concerns of the residents who will potentially be affected by the proposed remediation and redevelopment at former Vermont Tissue South Parcel (the Site) located at 1514 Bennington Road in Bennington, Vermont. This Community Relations Plan outlines how the BCRC has involved, and will continue to involve, affected residents, Town officials, and local organizations in the decision-making process regarding the development at the Site. This project is being funded by EPA Brownfields Assessment funding through BCRC's Brownfields Program (EPA grant #BF96131501 and EPA grant # 97186601) and The Vermont DEC Brownfields Revolving Loan Fund.

Active residents involved in neighborhood issues are important resources for the success of the Plan because they have an understanding of the Site area and they hold positions of responsibility within the community. The developers of the Site regard these citizens as key points of contact and communication. The long-term success of the development of the site will be enhanced by informed citizen involvement in each step of the cleanup and redevelopment process.

## **2. SPOKESPERSON AND INFORMATION REPOSITORY**

The Spokesperson for this project is Jim Henderson on behalf of the BCRC, who may be contacted at:

Jim Henderson  
Bennington County Regional Commission  
111 South Street, Suite 203  
Bennington, Vermont 05201  
phone: (802)442-0456  
fax: (802)442-0439  
jhenderson@bcrcvt.org

The information repository for this project, including the environmental assessments, remediation plans, and other environmental information is located at the:

Bennington County Regional Commission  
111 South Street, Suite 203  
Bennington, Vermont 05201  
(802)442-0713  
Hours: 9 AM to 4 PM, Monday through Friday

This information is available for viewing during normal business hours.

All public meetings will be held on at the Bennington County Regional Commission, at the following address;

111 South Street, Suite 203  
Bennington, VT 05201  
(802)442-0713

### **3. SITE DESCRIPTION**

#### **3.1 SITE LOCATION AND HISTORY**

The Site is currently vacant and owned by William Scully of AOE, Inc., but formerly hosted a paper manufacturing and processing facility. It is located at 1514 North Bennington Road in the Town of Bennington, Bennington County, Vermont. The surrounding host property is comprised of undeveloped woodlands to the west and south of the mill building and a dam on the southern side of the building in the Walloomsac River immediately to the south (none of which are addressed in this document). The parcel that hosts the Site is bisected by a portion of the Walloomsac River which forks upstream of the Site and forms an island. The former Vermont Tissue South property comprises 2.32 acres of land. The land surrounding the property is largely forested with mixed vegetation and some residential and commercial uses in the immediate vicinity. The Walloomsac River flows from east to west through the Site and joins the Hoosic River approximately 6 miles down-stream. The Hoosic River then joins the Hudson River in New York at a convergence approximately 50 miles west of the Site.

#### **3.2 FUTURE SITE USE**

The Former Vermont Tissue South site is currently vacant. The mill building is planned to be redeveloped into residential units and the hydro facility is planned for revitalization by AOE, Inc.

#### **3.3 SURROUNDING LAND USE**

Land uses adjacent to the subject property are primarily residential and commercial. Adjacent properties currently include the following:

- **North**: Residential and commercial properties along North Bennington Road (Map 22, Lots 16-02, 17-00, 19-00, 20-00, 21-01-, 21-02, and 23-01).
- **East**: Mixed residential and commercial properties along North Bennington Road (Map 22, Lot 43-00)
- **South**: Residential properties along Murphy Road (Map 22, Lots 36-00 and 41-00).
- **West**: Residential property (Map 22, Lot 33-00).

### 3.4 SUMMARY OF ENVIRONMENTAL CONDITIONS

This Corrective Action Plan (CAP) was prepared for BCRC by the Johnson Company and is a report whose scope is designed to clearly communicate the basis and details of the proposed cleanup strategy for contamination from polychlorinated biphenyls (PCBs), dioxin, furans, and polycyclic aromatic hydrocarbons (PAHs) at the Former Vermont Tissue South Site in North Bennington, Vermont. The property is owned by Mr. William Scully of AOE, Inc., and plays host to a former mill building. The building is currently vacant with the exception of some stored material and equipment owned by Mr. Scully. The CAP includes a discussion of why corrective action is needed, a brief summary of the results of previous investigations, a discussion of the chosen remedial techniques, a description of site operations and monitoring activities, and an estimate of the duration of the cleanup.

Potential risks to human health currently exist at the Site due to the presence of PCBs, dioxins, furans, and polycyclic aromatic hydrocarbons (PAHs), and will remain unless corrective action is taken. Affected media at the Site include soil, indoor air, concrete, plumbing, and surface contamination on interior portions of the buildings. It should be noted that not all media are affected by all contaminants. The sources of contamination at the Site are related to releases associated with former paper manufacturing activities at the Site. Any impacts to sediment in the adjacent Walloomsac River are not addressed in this CAP.

The selected corrective actions at this Site include: 1) decommission, removal and disposal of abandoned electrical equipment that may contain PCBs; 2) eliminate contaminant migration pathways by sealing floor drains; 3) removal and disposal of all dioxin containing residual paper pulp; 4) clean all interior surfaces of dioxin containing dust; 5) sealing all PCB impacted concrete surfaces with epoxy paint or sealant; 6) removal and disposal of abandoned and containerized hazardous debris; and 7) establish institutional controls for the Site to be documented in a deed restriction that will identify ongoing maintenance requirements and development limitations for the Site. The deed restriction will also identify and locate an area of PAH impacted soil and buried process water piping which may contain dioxin and PCB contaminated paper pulp. The deed restriction will be filed in the Town of Bennington land records and will include a plan for implementing annual inspections of the property to confirm the exposure risk has not increased.

It was concluded that onsite PCB detections were derived from an excluded product (carbonless paper) in accordance with the requirements of 40 CFR §761.30 (f). Because the use of

carbonless paper prior to 1978 was confirmed and all data thus far indicated that concentrations are below 50 mg/kg total PCBs, this waste did not meet the definition of a “remediation waste” as defined by the Toxic Substances Control Act (TSCA) and therefore the PCB clean-up at the former mill building and the lagoons will not be overseen by TSCA and the VTDEC will be acting as the sole regulating authority managing this clean-up.

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## **4. COMMUNITY BACKGROUND**

Bennington is a community of approximately 16,000 persons located in Bennington County, Vermont. It lies along the border with the State of New York. This vibrant community located between the Taconic and Green Mountains has a thriving historic downtown, hosts three colleges and is surrounded by natural beauty. The Site of the proposed project is located along the banks of the Walloomsac River approximately three miles from the downtown area.

### **4.1 COMMUNITY INVOLVEMENT**

The BCRC has proposed holding one public meeting for this Brownfield site. The public meeting has been scheduled for August 17, 2011 @ 5:30 PM at the BCRC Office on 111 South Street, Bennington, Vermont. The purpose of this initial public meeting will be to provide outreach to the public on the Brownfields cleanup process, the potential benefits of Brownfield site redevelopment, inform the local stakeholders of the results of the previous environmental assessments, describe what remedial measures are to be implemented at the site, and solicit input from the public on their concerns and desires for the site.

### **4.2 KEY COMMUNITY CONCERNS**

Concerns which may be expressed include:

- Concerns over potential health threats;
- Concerns over impacts to sensitive environmental receptors;
- Concerns over the quality of life in the community;
- Concerns that this site and other Brownfield sites in the area create blight in the community.

## 5. CONTINUED COMMUNITY INVOLVEMENT

The BCRC will utilize its existing partnership with the US EPA, the Vermont DEC, the Johnson Company and the Town of Bennington to provide continued community involvement for the project. The EPA and Vermont DEC have provided regulatory oversight of the Brownfields assessment process and will oversee cleanup. This project is being funded by EPA Brownfields Assessment funding (EPA grant #BF96131501 and #BF97186601). Cleanup is being funded through Vermont's Brownfields Cleanup Revolving Loan Fund which is financed by the EPA Brownfield Grant Program.

A public notice will be placed on the Bennington County Regional Commission web site announcing the intended remediation activities at the site and to notify residents of a public meeting regarding the proposed remediation efforts. In conformance with the EPA Brownfields cleanup process requirements, the public notice will also announce that the information repository on this project, including the environmental assessments, and other environmental information is located at the BCRC's offices and is available for review during normal business hours and at other times by appointment. The notice will also announce the start of a thirty-day comment period on the draft Corrective Action Plan for Site Remediation (CAP) and proposed Cleanup Plan which will run from **August 1, 2011 to August 31, 2011**.

In addition, a meeting announcement will be placed in the Bennington Banner notifying residents of the public meeting to be held at the BCRC Office. **This meeting is scheduled for Wednesday, August 17, 2011 at 5:30 PM at the BCRC Office.** The BCRC will accept comments on the draft CAP and proposed Cleanup Plan during the comment period and will provide written responses which will become part of the administrative record. The information repository will be updated with the inclusion of all meeting minutes, status reports and other communications.

Comments can be submitted at the meeting, by email (jhenderson@bcrcvt.org) or in writing to the following address:

Bennington County Regional Commission  
Jim Henderson, Natural Resources Project Manager  
111 South Street, Suite 203,  
Bennington, VT 05201  
(802) 442-0456  
Hours: 9 AM to 4 PM, Monday through Friday

## **6. SCHEDULE**

July 2011 – The BCRC prepares and submits Community Relations Plan to Vermont DEC and EPA for review and approval.

July 2011 – EPA approves Community Relations Plan.

July 2011 – Plan is placed in repository.

August 1, 2011 – The BCRC announces notice of availability of draft of proposed Corrective Action Plan for Site Remediation and Cleanup Plan. The BCRC schedules public meeting to present the plan and solicit comments. The Vermont DEC publishes a legal notice announcing availability of plans, marking the beginning of a 30 day public comment period on the plan.

August 17, 2011 – The BCRC holds public meeting to present the plans and solicit comments.

August 31, 2011 – Public comment period ends.

September 2011 – The BCRC issues final Corrective Action Plan for Site Remediation and receives final approval of plans from EPA and Vermont DEC.

September 2011 – Cleanup project begins.