East Haddam Land Trust

March 6, 2024

Application to East Haddam Inland Wetlands and Waterways Commission
For Work at Honey Hill Farm, 103 Honey Hill Road, East Haddam, CT

Executive Summary

East Haddam Land Trust, Inc. (EHLT) must clean up the remains of a small farm dump site in order to receive promised state open space grant money, which will allow EHLT to close on and take ownership of the 126-acre Honey Hill Farm property on Honey Hill Road. (State funding has been promised toward acquisition of only some 123 acres of the property, but the farm dump lies within that 123-acre portion of the lot.) The cleanup has been ordered by the CT State Department of Energy & Environmental Protection (DEEP), under whose oversight the cleanup will conducted.

The cleanup site is small, some 40' x 16' in total, and the work required will be minimally invasive; however, the site does lie in proximity to a wetland; hence this application.

Background

EHLT entered into a contract (the "Contract") to buy Honey Hill Farm (Map 13, Lot 3) on August 1, 2022. The contract was contingent on EHLT receiving a grant under DEEP's Open Space and Watershed Lands (OSWA) program. EHLT was successful in obtaining an OSWA grant of $321,100, which was announced by DEEP in May 2023, at which point the Contract became binding on all parties.

Prior to entering into the Contract, EHLT was aware of a small farm dump on the property. Accordingly, after the Contract was executed and with the Sellers' permission, EHLT removed some six tons of material from the dump site at EHLT's own expense. However, in July 2023 DEEP informed EHLT that further environmental testing of the farm dump site would be required. EHLT then conducted the required testing and, based on the test results received, DEEP directed that further remediation would be required before the above-referenced $321,000 in OSWA acquisition grant funds can be released.

East Haddam Land Trust
P.O. Box 122
East Haddam, CT 06423

(860) 484-3458
info@ehlt.org
www.ehlt.org

EHLT estimated total costs of remediation and related consultant's and testing costs to be in the range of $35,000-$65,000. In light of the magnitude of the estimated costs, EHLT applied for a separate federal/state CERCLA 128(a) grant, administered by DEEP's Brownfields Division, to fund the remediation.

On February 22, 2024, EHLT was awarded the CERCLA 128(a) remediation grant. No work funded by the new grant funds can be commenced before EHLT has entered into a contract with DEEP; however, EHLT expects to receive and execute a contract with DEEP within the next few weeks and wishes to take all steps necessary to begin work as soon as possible. To that end, it is submitting this application so that work can commence immediately upon execution of the contract with DEEP.

EHLT notes that it is essential in this case that all remediation and associated paperwork be completed as quickly as possible, because the terms of the Contract with the Sellers require that EHLT close on the property by August 1, 2024.

Work to be Performed

Attached is a report prepared by EHLT's licensed environmental professional, a representative of EKI Environment and Water, Inc. (the "Report"). The Report was submitted to DEEP along with EHLT's remediation grant application, and lays out, on page 7, the scope of work to be performed at the farm dump site. It should be noted that the enforcement division of DEEP has concluded that no disruption permit is required; hence, the steps remaining to be performed are:

- Excavate for off-Site disposal an estimated 71 – 95 cubic yards of mixed soil and debris. Based on the analytical data conducted, this material is anticipated to be disposed of as a Connecticut regulated, non-hazardous waste. Upon profile acceptance, the waste may be suitable for disposal at a facility such as the Plainville, Connecticut landfill or Clean Earth facility.

- Remove remaining surface debris from an approximately 5,120 square foot area, not included within the excavation area by hand picking and raking. Handle debris as solid waste for disposal.

- Conduct soil confirmation sampling of area for constituents of concern. Confirm the soil mitigation measures meet the appropriate CTDEEP RSR RES DEC and GA PMC standards. If necessary, evaluate background concentration outside of debris/fill area to establish clean up objectives.

- Prepare and submit a mitigation closure report to the CTDEEP.

Conclusion

EHLT would be grateful if this application can be placed on the Commission's agenda for the March 19, 2024 meeting. An EHLT representative would be prepared to attend to answer questions and to provide any additional background that may be requested.

Cameron Beard

EHLT Stewardship and Land Acquisition Chair

Cameron.beard@ehlt.org

(860) 876-3809