



BETHEL HEALTH DEPARTMENT

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To: Michael Kozlowski, Chairman, Planning & Zoning Commission
From: Laura L. Vasile, Director of Health *LTV*
Date: February 10, 2026
Subject: 0 Wooster St Bethel-15 Great Pasture Rd Danbury Industrial Building and Property Re-Development

We have reviewed the CCA correspondence dated 9/16/25 prepared by Kerry M. Hanlon, PG, LEP and the Revised CCA project plans including the Grading & Drainage Plan revised dated 2/3/26, Erosion Control Plan dated revised 2/3/26 and the Landscape Plan dated revised 12/1/23 prepared for Eppoliti Industrial Realty Inc.

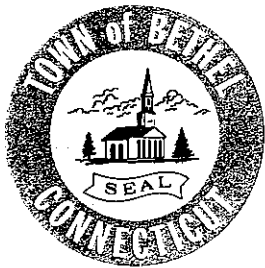
It appears that the changes involve stormwater, drainage, and grading. Screened-in garbage enclosures for garbage and recycling management are still shown on the plans to support the prevention of nuisance conditions. The revised site plans also include construction and other associated site improvements proposed on the original Site plans revised dated 12/1/25 that BHD reviewed and provided comments on previously. *Dust Control and site management during construction appears important in the densely populated area where the re-development is to occur*

We reviewed the Environmental Conditions report dated 9/16/2025 prepared for Eppoliti Industrial Realty, Inc, prepared by Kerry M. Hanlon, PG, LEP, received 1/22/26, concerning the environmental conditions as it relates to proposed re-development. Page five (5) of the report Item #8 states that there is only one engineered barrier that exists and it is located in the Environmental Land Use Restriction and Grant of Easement (ELUR) area against the south and west walls of the south west corner of the building in Danbury. See Barrier location maps and details provided in Exhibit E of the LEP's correspondence. The environmental report page 2 indicates that the *ELUR remains in place and restricts disturbance of soil below 10 feet within the area depicted on Exhibit A*. The ELUR is filed in the City of Danbury and Town of Bethel Land Records. *Kerry Hanlon, PG, LEP advised the health department that most of the ELUR area is under the Danbury building and that a portion of the ELUR approx. a 30 ft strip area outside the Danbury Building will have shallow surface work done related to grading, paving and curbing high above the restricted no soil disturbance area below 10 feet of the ground surface within that ELUR area. The Danbury ELUR area is to be maintained as required.*

The health department Site Plan review dated 1/13/26 issued for the Site Plan dated revised 12/1/25 is still valid and applicable to the project to address public health, environmental and safety concerns. Therefore, the health department requests that the conditions and provisions described and recommended in the BHD Site Plan Review Memo dated 1/13/26 be incorporated with the project approval, if such approval is granted by the Planning and Zoning Commission. See attached original BHD Site Plan review dated 10/17/25 attached that still applies to the Revised Site Plans. The ELUR is to be maintained for environmental health protection.

The applicant will submit an application to the health department as part of the local permit construction process describing the project work to be done in a manner which supports public health protection and safety.

If you have any questions, please contact me.



BETHEL HEALTH DEPARTMENT

(203) 794-8539

To: Michael Kozlowski, Chairman, Planning & Zoning Commission

From: Ryan Boggan, Public Health Official
Laura L. Vasile, Director of Health *LLV*

Date: January 13, 2026

Re: Review of Plans for: 0 Wooster St Bethel-15 Great Pasture Rd Danbury Industrial Building and Property Redevelopment

We have reviewed the Site Development Plans dated revised 12/01/2025 and Development Report dated December 4, 2025 prepared by CCA a Division of Haley Ward, Inc for construction of a 1-story industrial building on the property at 0 Wooster St Bethel-15 Great Pasture Rd Danbury, as part of a larger overall redevelopment project that crosses town lines into the City of Danbury. Submitted plans call for a 9,750 square foot industrial building with tenants to be determined at a later date, as well as associated grading, paving, and other lot improvements on the 2.2-acre Bethel portion of the project. An adjacent 11.854-acre parcel located in Danbury with an existing 74,442 square foot industrial building, to remain, is proposed to be redeveloped with three (3) additional new buildings totaling approximately 50,675 square feet, as well as associated grading, paving, and other lot improvements to be incorporated with the proposed Bethel portion of the project. Based on review of the CT DEEP Comprehensive Environmental Response, Compensation and Liability Information System (CERCLIS database) concerning List of Contaminated or Potentially Contaminated Sites now stored in data.ct.gov, it appears that 15 Great Pasture Road Danbury appears to have been at some time listed in the DEEP CERCLIS List. The Danbury property may also include an Environmental Land Use Restriction (ELUR) filed with DEEP and/or the City of Danbury. *The applicant and property owner can clarify to the Commission the property potential contamination status and whether it is on the CERCLIS List and/or has an ELUR that has to be maintained.* The redevelopment design construction plans should include construction controls and activities to prevent and minimize adverse impacts to the property, buildings, and surrounding area, from the redevelopment completed. Public water and sewer are planned to serve the site. Submitted plans show two (2) separate screened-in garbage enclosures on concrete pads for the use of planned tenants located in the Bethel building portion of the development, and six (6) separate screened-in garbage enclosures proposed for the Danbury portion of the site, totaling eight (8) screened-in garbage enclosures for the overall development.

We offer the following comments with respect to the proposed site development plans:

1. The screened-in garbage & recyclables enclosures are to be maintained for the appropriate collection and storage of garbage and recyclables prior to pick up by a waste hauler to prevent nuisance conditions including attracting wildlife and/or rats on the property. Proper storage of refuse is required on the property including placement of garbage, refuse and recyclables, in sealed paper/plastic bags held in the closed refuse containers within screened-in garbage facility areas. It is important to properly handle trash and food wastes to avoid rodent and insect nuisance conditions on the site.
2. Tenants for the proposed industrial building have not been identified at this time. Tenant(s), when identified, are to submit detailed project narrative(s) to the Bethel

Health Department for review identifying planned use, activities, and any planned construction/modification to the units to accommodate planned use. Property owner/operator and commercial tenants are responsible to control any/all noise, odors, or other potential nuisance conditions that could arise from planned commercial activities on this site in accordance with all applicable regulations.

3. The proposed plans should incorporate *technical design to assure potential surface flooding issues are prevented* to avoid the potential for flooding events to cause water damage, and/or moisture or mold problems in proposed buildings and on the property. If water collects and remains around the structures it could cause dampness and growth of mold within the commercial buildings with potential occupational exposure.
4. Storm drainage systems are shown and construction and installation approvals will be provided by other agencies.
5. Written procedures for chemical/material handling, storage, management plans, spill prevention and control to be provided if applicable for property use.
6. Chemical waste storage and disposal should be outlined if applicable for property use.
7. Prohibition of all non-domestic wastewater type discharges to the ground and/or groundwater in accordance with St of CT DEEP requirements.
8. The building inspector should be advised to review any plans for floor drainage systems which must be directed to holding tanks or other drainage systems reviewed and approved by the Department of Environmental Protection.
9. Due to the emergence of West Nile Virus in Connecticut, the applicant must avoid creating any areas on the property where stagnant water will collect for 7 to 10 days or longer of time and become a stagnant water breeding ground for potentially infected mosquitoes requiring a mosquito breeding prevention and larvicide plan.
10. No food service to the public is proposed as part of this application.

Based upon our review of the information provided, BHD has no objections to approval of the Site Plan by the P&Z Commission with consideration and compliance with the comments described above and as per applicable regulations and industry standards.

If you have any questions, please contact us.

Russell T. Posthauer, Jr., P.E., President
Steven C. Sullivan, P.E., Vice President
Kerry M. Hanlon, P.G., L.E.P.
Nicholas Yuschak Jr., R.L.A.
Douglas Belknap, R.L.S.



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September 16, 2025

Michael Eppoliti
Eppoliti Industrial Realty, Inc.
15 Great Pasture Rd Suite 3
Danbury, CT 06810

RE: Environmental Conditions
15 Great Pasture Road

Dear Mr. Eppoliti

CCA has prepared this letter at your request to address questions raised by the City of Danbury Environmental Impact Commission (EIC) during their July 23, 2025, meeting regarding the environmental condition of 15 Great Pasture Road (the "subject site") as it relates to proposed development.

As CCA understands it, given the extensive environmental regulatory history at the subject site the EIC has questions and concerns regarding the regulatory status, current environmental conditions, and the potential for disturbance of contaminated soil during the proposed development.

CCA reviewed information provided by you, and thousands of pages of publicly available local, state and federal records.

SITE HISTORY

Audio tape was produced in the 75,000 square foot main building from 1957 to 1985. Polyester film was coated with a dispersion mixture comprised of iron oxide, binders, and solvents, principally tetrahydrofuran (THF) and toluene (T). Other solvents including Freon®, methyl isobutyl ketone (MIBK), isobutyl acetate (IBA), butyl acetate (BA), methyl ethyl ketone (MEK), and ethylbenzene (EB) were also used in much lesser quantities for cleaning and other operations. From 1969 to 1985 the dispersion solvents were recovered and reused. Vapors were captured by carbon adsorption, released from the carbon by steam stripping, and then distilled until usable.

REGULATORY STATUS

Connecticut Property Transfer Act

CTDEEP accepted a Connecticut Licensed Environmental Professional's (LEP's) final verification for the latest transfer of the subject site, a Form III filed on April 1, 2003, and considers that filing closed. The final verification is partly reliant on an Environmental Land Use Restriction and Grant of Easement (ELUR) originally filed in 2009 and refiled in 2015 which remains in place and restricts disturbance of soil below 10 feet within the area depicted on Exhibit A. The ELUR is filed with both City of Danbury and Town of Bethel Land Records.

RCRA

There do not appear to be any continuing obligations related to the former RCRA activities of Columbia Magnetics. By letter dated January 25, 2013, CTDEEP notified Eppoliti Industrial Realty, Inc. that an administrative decision was made to:

- Terminate Interim Status for the above referenced facility in accordance with Connecticut General Statutes ("CGS") 22a-6h and the Regulations of Connecticut State Agencies ("RCSA") 22a-449(c)-110, incorporating 40 CFR 270.73 and applicable sections of 40 CFR 124;
- Issue the certificate of completion for clean-up activities; and
- Release CBS Corporation (successor to Columbia Magnetics) from the financial assurance and liability requirements pursuant to RCSA Section 22a-449(c)-105(a), incorporating 40 CFR 265.143(h) and 40 CFR 265.147(e).

A copy of the letter and certificate of completion is provided as Exhibit B.

CERCLA

There do not appear to be any continuing obligations related to CERCLA for the subject site.

- On May 29, 2012, CTDEEP requested USEPA issue a CERCLIS Archive Letter for CERCLIS No. CTD050628148.
- According to EPA database records CERCLIS No. CTD050628148 was archived on June 4, 2012.
- A copy of the database page listing the status of the subject site is provided as Exhibit C

SITE INVESTIGATIONS AND REMEDIAL ACTIONS

The site has been extensively investigated by CTDEP, USEPA and the former property owner and their respective consultants. Reports from CDM, W&C, RFW, NES, GZA, NUS consultants are in the files.

Thirteen Areas of Concern (AOCs) were identified and investigated by various investigators. Investigations comprised:

- 52 Soil Borings and associated soil samples,
- 8 wells installed with 40 quarters of monitoring data,
- 43 soil gas samples,
- 7 surface water samples, and
- 5 sediment samples.

The locations of the sample points are shown in Exhibit A

No releases were identified in eight of the thirteen AOCs. The other five AOCs had elevated solvent concentrations in soil and were remediated as follows:

AOC 1 (Downgradient of RCRA Drum Storage Area) &
AOC 5 (RCRA Drum Storage Area)

- Clean Closed under CTDEP Oversight
- 270 cubic yards of soil was removed and disposed of off- site.
- Post-excavation samples below action levels and RSRs.
- Down-gradient groundwater in compliance

AOC 2 (Solvent Tank Farm) &
AOC 3 (Process UST)

- 490 cubic yards of soil was removed and disposed of off- site.
- Post-excavation samples below action levels and RSRs.
- Down-gradient groundwater was in compliance

AOC 4 (Southwest corner of main building).

- 3,800 cubic yards of soil was removed and disposed of off- site.
- Soil was removed down to bedrock except near the building where it was sloped outward from the building footing and covered with an engineered barrier.
- Post excavation samples along the outer perimeter walls of the excavation were all ND.
- Down-gradient groundwater was in compliance.
- An ELUR limiting disturbance of contaminated soil was filed in Danbury on September 14, 2015, and in Bethel on October 8, 2015 (This is the same ELUR filed in 2009 which refiled to include a missing page). A copy of the ELUR is provided as Exhibit D.

CURRENT ENVIRONMENTAL CONDITIONS.

Investigations and Remedial Actions were conducted after tape manufacturing ceased. No known high-risk activities have been conducted on or releases reported at the subject site since tape manufacturing ceased. Therefore, current environmental conditions should be the same as documented in investigation and/or remedial action confirmation samples and most likely have improved by natural attenuation.

Environmental conditions are discussed below by media.

Soil

About 60 soil borings were advanced on the subject site and upwards of 100 soil samples were collected and laboratory analyzed. Although COCs were detected in soil at five AOCs, the concentrations in four of the areas were relatively low and the soil was successfully “clean closed” by excavation and removal of contaminated soil. Inaccessible soil with COCs above RSR criteria was left in place at the southeast corner of the building. This area is covered by the ELUR and is the only area of the subject site with concentrations of COCs in soil above RSR criteria.

Soil Gas

Forty-three (43) soil gas samples were taken below the building in former solvent handling areas. Solvents were detected in soil gas, but the concentrations were below the RSRs, including near

where the highest concentrations of solvents remain in site soil thus it is very unlikely soil-gas criteria would be exceeded anywhere on the subject site.

Groundwater

From 1986-1996 forty (40) rounds of quarterly groundwater sampling were conducted after completion of remedial actions. Although solvents were detected inconsistently in several wells, there were no exceedances of RSR criteria in the last 19 sampling rounds.

Sediment

Five sediment samples were collected in 1991 (after completion of remedial activities). Site specific COCs were not detected in the samples.

Surface water

Three surface water samples were collected in 1991 (after completion of remedial activities). Site specific COCs were not detected in the samples.

RESPONSES TO SPECIFIC QUESTIONS/ISSUES RAISED BY EIC

Questions and issues raised by the EIC at their July 23, 2025, meeting are paraphrased below in italics followed by our responses.

1. *What is the existing heat supply and what is the status of the two 15,000-gal fuel oil USTs adjacent to the southeast corner of the building?*

The building is heated by natural gas. There were no reported releases from the fuel-oil USTs, and they were removed in 1992. In 2003 a GPR survey was conducted to locate the tank graves, and a series of 10 soil borings were advanced in the areas of the tank graves. No VOCs or petroleum hydrocarbons were detected in soil samples collected from the soil borings. Semi-VOCs (SVOCs) were detected in two samples but were at concentrations below RSR criteria.

2. *Provide a copy of ELUR (possible missing page 2?) and explain why there is a 9-year difference for ELUR filing dates at Danbury and Bethel?*

A copy of the ELUR is provided as Exhibit D. The ELUR was originally filed in both Danbury and Bethel in 2009. The ELUR was refiled in Danbury on September 14, 2015, and in Bethel on October 8, 2015. The 2015 filings was to add page 2 of the Declaration of Environmental Land Use Restriction and Grant of Easement which was missing from both of the 2009 filings.

3. *Were any test pits conducted within the ELUR area? What was the cell tower (leased) install date – was there any ELUR disturbance?*

The owner is unaware of any test pits in the ELUR Area and states there was no ELUR disturbance by cell tower construction. The cell tower was completed in 2018.

4. *There was a historic discharge to the sewer – was there any wastewater discharge into septic?*

Reportedly production wastewater was not discharged to the septic system. In 2005 a GPR survey was conducted to locate the leach field, and two soil test borings were advanced to

bedrock – groundwater was not encountered. One soil sample was collected and analyzed for COCs – they were not detected.

5. *Historic solvent recovery – adjacent to SW corner of building (east of proposed retention pond) - 15k storage tanks for recycled toluene?*

The solvent recovery system utilized 15 aboveground storage tanks containing solvent and solvent contaminated water in the area identified as Former Process Solvent Tank Farm (AOC#2) and 9 underground storage tanks containing spent solvent in the area identified as the Former Underground Storage Area (AOC#3). The entire capacity of the solvent recovery system was reportedly 12,500 gallons.

6. *Sludge disposal offsite – residual from imprinting on magnetic tape (iron oxide sludge)?*

Reportedly all sludge was disposed of off-site. Prior to 1984 the sludge was disposed of at the Danbury Municipal Landfill and thereafter it was drummed and removed from the site.

7. *NFRAP – is it off the Active CERCLIS list? Confirm status with EPA.*

The site was archived on June 4, 2012 (see Exhibit C).

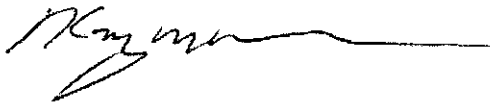
8. *Engineering Control – where are barriers locations, provide a description of the barriers?*

There is only one engineered barrier, it is located in the ELUR area against the south and west walls of the south west corner of the building. The barrier was designed to prevent percolation of water through the contaminated soil and to prevent accidental disturbance of the contaminated soil. Barrier location maps and details are provided in Exhibit E.¹

9. *Former drum storage area – include on site plan.*

Exhibit A is the Proposed Site Plan with Environmental Sampling and Remedial Action Areas overlain

Respectfully submitted,



Kerry M. Hanlon, PG, LEP

CCA LLC

Attachments

- Exhibit A: Proposal Site Plan with Environmental Sampling and Remedial Action Areas
- Exhibit B: RCRA Closure Certificate of Completion
- Exhibit C: CERCLA Database Listing
- Exhibit D: Environmental Land Use Restriction
- Exhibit E: Engineered Barrier Details