

November 14, 2008

Environmental Management Support, Inc.  
Attn: Mr. Don West  
8601 Georgia Avenue, Suite 500  
Silver Spring, MD 20910

Dear Mr. West:

The City of Bristol, CT (City) is applying for an FY 2009 U.S. Environmental Protection Agency (EPA) Brownfields Cleanup Grant for the site known as the Former H.J. Mills Property (Mills Property), Assessor's Map 30 Lots 61-1A and 61-2.

**Applicant Identification**

City of Bristol, CT  
111 North Main Street  
Bristol, CT 06010

**Funding Requested**

- i) Grant Type: Cleanup Grant
- ii) Federal Funds Requested: \$145,033; a cost-share waiver is not being requested
- iii) Contamination: Hazardous Substances

**Location to be Served**

City of Bristol, Hartford County, Connecticut

**Property Name and Site Address**

Former H.J. Mills Property  
149-151 Church Street  
Bristol, CT 06010  
Assessor's Map 30 Lots 61-1A and 61-2

**Contacts**

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Chief Executive/Elected Official  
Arthur J. Ward, Mayor  
City of Bristol  
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Bristol, CT 06010  
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**Date Submitted**

Postmark date November 14, 2008 via United States Postal Service (USPS)

**Project Period**

Three years: anticipated start date of August 1, 2009 and end date of July 31, 2012

**Population**

- i) 60,062 per 2000 Census; 60,958 in 2007 per Connecticut Economic Resource Center, Inc.
- ii) Does not apply

The City of Bristol is very excited at the prospect of cleaning up and reusing the Former H.J. Mills Property. The property consists of three parcels: Assessor's Map 30 Lot 49-50; Assessor's Map 30 Lot 61-1A; Assessor's Map 30 Lot 61-2. This application is for cleanup of the Assessor's Map 30 Lots 61-1A and 61-2: two parcels which encompass 0.4 acres of the property. The Mills Property has been an abandoned and blighted site in our downtown business district for twenty-three years. The site housed a paper and cardboard box manufacturing facility dating from approximately 1895 through 1985, at which point the site was abandoned. A fire destroyed the facility in December 1998, and the building remains were immediately demolished and removed from the site by the City. The City acquired the property in July 1999 through foreclosure due to tax arrearage and lack of a living owner. We have had the good fortune to receive funding from and work with EPA in the performance of environmental site assessments of the site. In March 1999, EPA awarded the City a Targeted Brownfields Assessment (TBA) grant, and ASTM E1527-00 Phase I and ASTM E1903-97 Phase II equivalent environmental site assessments of the property were conducted by Metcalf & Eddy. In September 1999, the City engaged an environmental firm to remove a heating-oil underground storage tank and to effectuate a closure of the same on the site. Based in part on the work done through the TBA and the underground storage tank closure, the City applied for and was awarded an EPA Brownfields Assessment Demonstration Pilots (Assessment) grant in August 2001. As part of our Assessment grant, a Phase III environmental site assessment including a conceptual remediation plan and cost estimate was completed for the Mills Property site. The City has determined that the most appropriate reuse of the site is a community parking lot. In September 2008, the City used the data from the environmental site assessments to engage an environmental consulting firm that has additional expertise in engineering and landscape architecture to develop three conceptual designs and cost estimates for concurrent remediation and construction for the site. The last piece of the puzzle needed to enable the City to productively reuse this site is the environmental remediation. We hope to partner once more with EPA in our efforts to revitalize this important property in our downtown business district.

Thank you for your consideration of our enclosed application.

Sincerely,

Arthur J. Ward  
Mayor

## Threshold Criteria

### 1. Applicant Eligibility

#### a. Eligible Entity

The City of Bristol (City) is a general purpose unit of local government that was incorporated in the State of Connecticut in 1911.

#### b. Site Ownership

The City is the sole owner of the Mills Property, Assessor's Map 30 Lots 61-1A and 61-2.

### 2. Letter from the State Environmental Authority

Please see Attachment A for the letter from CT Department of Environmental Protection (CT DEP) acknowledging that the City plans to conduct cleanup activities at the Mills Property, Assessor's Map 30 Lots 61-1A and 61-2 and plans to apply for federal grant funds.

### 3. Site Eligibility and Property Ownership Eligibility

#### Site Eligibility:

#### a. Basic Site Information

The site is the Former H.J. Mills Property, Assessor's Map 30 Lots 61-1A and 61-2. The site address is 149-151 Church Street, Bristol, CT 06010. The site is wholly owned by the City of Bristol, CT.

#### b. Status and History of Contamination at the Site

The site is contaminated by commingled hazardous substances and petroleum. The property was used for the manufacture of paper and cardboard boxes from circa 1895 through 1985, at which time the business and property were vacated. A fire destroyed the facility in December 1998. The City immediately demolished the building remains due to safety concerns. Materials containing asbestos, petroleum soaked wood, and metals were removed from the site and properly disposed; any remaining material was used as on site fill. The City foreclosed on the property in July 1999. The site is currently vacant and surrounded by a fence to prohibit public access. The City has performed ASTM E1527-00 Phase I and ASTM E1903-97 Phase II environmental site assessment equivalents utilizing EPA TBA funds as well as a Phase III environmental site assessment utilizing EPA Assessment grant funds. Based upon an industrial/commercial end use, two proposed remediation areas have been identified on the property as a result of the assessment work. Contaminants identified above the CT DEP Remediation Standard Regulation (RSR) levels for Industrial/Commercial Direct Exposure Criteria (I/C DEC) and/or GB Pollutant Mobility Criteria (GB PMC) include ETPH and various Polyaromatic Hydrocarbons. It is believed that the site contamination is due to the box manufacturing activities including the use of inks, surface spills, and/or contaminated fill. Approximately one-quarter of the 0.4 acre site is impacted with contaminants above CT DEP RSRs. The affected areas will require excavation and soil removal to a depth of two to six and a half feet to achieve I/C DEC and GB PMC compliance, respectively; other areas will not require soil removal but will require Environmental Land Use Restrictions (ELURs). Compliance with ground water criteria is expected to be accomplished through ground water monitoring for a period of two years following soil removal.

**c. Sites Ineligible for Funding**

The Mills Property is not listed or proposed for listing on the National Priorities List. The site is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. The site is not subject to the jurisdiction, custody, or control of the United States government.

**d. Sites Requiring a Property-Specific Determination**

The site does not require a property-specific determination because there are no planned or ongoing removal actions under CERCLA; no unilateral administrative order, court order, or administrative order on consent has been issued or entered into; no judicial consent decree or permit has been issued by the United States or an authorized state under RCRA, FWPCA, TSCA, or SDWA; the site is not subject to RCRA corrective action; the site is not a land disposal unit; there has been no release of PCBs and no part of the property is subject to TSCA remediation; and no monies are being received for cleanup from the LUST trust fund.

**e. Environmental Assessment Required for Cleanup Proposals**

An ASTM E1527-00 Phase I report equivalent entitled “Background Summary Memorandum” was prepared for EPA and the City by Metcalf & Eddy in August 1999. An ASTM E1903-97 Phase II report equivalent entitled “Targeted Brownfields Assessment Final Report” was prepared for EPA and the City by Metcalf & Eddy in January 2001. Both of these reports were prepared under EPA Contract # 68-W6-0042. A Phase III report entitled “Subsurface Environmental Investigation Report” was prepared for the City by HRP Associates, Inc. in May 2005. Funding for the Phase III work was provided by EPA Assessment grant monies awarded to the City.

**Property Ownership Eligibility:**

**f. CERCLA §107 Liability**

The City is not potentially liable for contamination at the Mills Property under CERCLA §107 because the City acquired the property involuntarily (CERCLA §101(20)(D)) through foreclosure action due to tax arrearage and the lack of a known/extant owner.

**g. Enforcement Actions**

The City knows of no ongoing or anticipated environmental enforcement actions related to the Mills Property.

**h. Information on Liability and Defenses/Protections**

**i) Information on the Property Acquisition**

The City acquired the site through foreclosure of real property taxes and no known/extant owner. The property deed was signed on June 7, 1999 and was recorded in the City of Bristol Land Records on July 14, 1999. The City has sole fee simple ownership of the

site. The property was acquired from the “Committee” appointed by the Superior Court for the Judicial District of New Britain, CT. The City has no familial, contractual, corporate or financial relationships or affiliations with the prior owners or operators of the property or with the “Committee” appointed by the Superior Court to sell the property.

**ii) Timing and/or Contribution Toward Hazardous Substances Disposal**

All disposal of hazardous substances at the site occurred prior to the City’s acquisition. The City has not caused or contributed to any releases at the site. At no time has the City arranged for the disposal of hazardous substances at or transported hazardous substances to the site.

**iii) Pre-Purchase Inquiry**

The City acquired the site through tax foreclosure and lack of a known/extant owner in 1999. The only inquiries performed by the City prior to acquisition were those involving the identification of a living owner(s) of the property. ASTM E1527-00 Phase I and ASTM E1903-97 Phase II equivalent site assessments were performed for EPA and the City by Metcalf & Eddy in summer 1999 and spring 2000 respectively under an EPA TBA grant. Metcalf and Eddy were selected by EPA to perform this work. In the fall of 2003, a Phase III environmental site assessment was conducted for the City by HRP Associates, Inc. under an EPA Assessment grant. The City selected HRP Associates, Inc. through a competitive bid process with the advice of EPA Region I staff. All work that was performed by HRP Associates, Inc. was pre-approved by EPA through the submission and approval of a Quality Assurance Project Plan (QAPP). The work performed by both environmental firms was overseen by a Licensed Environmental Professional (LEP) as defined by Connecticut General Statutes §22a-133v(e) that designates the qualifications required of individuals for licensure by the Commissioner of CT DEP for performance of environmental assessment and remediation under the State Voluntary Remediation Program. The City meets the Phase I assessment update requirements since Phase II and Phase III assessments were done subsequent to the Phase I assessment.

**iv) Post-Acquisition Uses**

The site has remained vacant and unused since acquisition by the City.

**v) Continuing Obligations**

Upon acquisition of the property, the City removed and closed a leaking fuel oil underground storage tank, thus stopping any further release of contaminants from the tank. The City has also fully restricted use of the property since the performance of environmental site assessments revealed the presence of contaminants on the property. In addition to restricting use of the property, the City has installed six-foot-high fencing around the perimeter of the property to deny public access to the site.

The City will comply with all land-use restrictions and institutional controls; provide access to and assist and cooperate with those performing the cleanup of the site; comply

with all information requests and administrative subpoenas that have or may be issued in connection with the property; and provide all legally required notices.

#### **4. Cleanup Authority and Oversight Structure**

- a.** The City will enroll in the CT DEP Voluntary Remediation Program (VRP) under §22a-133x of the Connecticut General Statutes. In addition to participating in the VRP, the City will hire an environmental firm that employs an LEP licensed by CT DEP to oversee the cleanup. The firm will be selected through a competitive bid process following the City's procurement procedures: a Request For Proposals (RFP) will be let, proposals received in response to the RFP will be reviewed and rated by a review panel appointed by the Mayor, the three highest ranked proposers will be interviewed and ranked by the review panel, and the review panel will select the firm ranked highest during the interview process as the environmental consultant for the project. Should the City be unable to negotiate an acceptable contract with the highest ranked respondent, it will negotiate with the next lower ranked respondents until an acceptable provider of environmental services is secured. In the event that the City is unable to secure an acceptable provider as a result of the initial RFP, a subsequent RFP will be issued following the procedures outlined above. No cleanup activities will occur on the site until a qualified environmental firm employing a Licensed Environmental Professional is engaged by the City.
  
- b.** It is not anticipated that cleanup activities will impact adjacent or neighboring properties. However, the City has hired AKRF, Inc. to develop three conceptual designs for concurrent remediation and reuse of the site as a community parking lot. Part of AKRF's charge is to engage contiguous and nearby property owners to determine their needs, concerns, and wishes regarding the redevelopment of the site. The relationships that will be fostered and strengthened through this process will enable the City to obtain access to adjacent/neighboring sites if the need arises.

#### **5. Cost Share**

- a.** The required cost share will be met through in kind services.

The in kind services will be provided by City staff and by Community Partners. The City's Grants Administrator will provide general project oversight including oversight of the cooperative agreement. She will also coordinate and perform the planned community outreach and information tasks. The City's Economic Development Director will film public information meetings and the resulting tapes will be provided to Nutmeg Public Access TV for airing. The City's Corporation Counsel will provide in kind legal services associated with development and filing of Environmental Land Use Restrictions and any other legal services that arise during the project period. The City Public Works Department's (PWD) in kind contribution will be clean fill as well as the transportation of the fill to the site. PWD will also provide the staffing and equipment for the paving of the community parking lot; that portion of the paving which serves as an environmental cap over contaminated soils remaining on site will be in kind services to the project. An A-2 Survey and Topo Map will also be provided in kind by City PWD staff.

Following is a chart showing the Community Partners and the in kind services each will provide

to the project:

<b>Community Partner</b>	<b>In Kind Service</b>
Bristol Baptist Church	-Outreach to parishioners -Outreach to other faith-based organizations -Hosting a public informational meeting
Bristol Boys & Girls Club/Imagine Nation Museum	-Outreach to proximal child care families -Hosting a public informational meeting
Bristol-Burlington Health District	-Collection and analysis of school-based asthma data -Participation in all informational meetings
Bristol Community Organization	-Outreach to Hispanic, low-income, and proximal child care families -Provide Spanish language translation of outreach materials -Provide Spanish-speaking translator for all public informational meetings
Bristol Preschool Child Care Center	-Outreach to proximal child care families
Greater Bristol Chamber of Commerce	-Marketing and outreach to the business community -Hosting two informational meetings for the business community

The costs for redevelopment of the site as a community parking lot are currently included in the City's Five-Year Capital Improvement Program. It is anticipated that these funds will be bonded and appropriated by the City's Board of Finance during the City's FY 2009-2010 budget process.

**b.** The City is not requesting a hardship waiver of the cost share.

### **6. Community Notification**

The City placed a notice in *The Bristol Observer*, *The Bristol Press*, and *The Hartford Courant* on October 24, 2008 announcing that the City is applying for an EPA Brownfields Cleanup Grant for the Mills Property, that the draft application will be available for review and comment from October 27 through November 10, 2008, and that a public meeting to provide information and to receive public comment on the application will be held on October 27, 2008 at 5:30 pm in the City of Bristol Council Chambers located in City Hall. Additionally, the Mayor's Office issued a press release on October 22, 2008 regarding the application, the review and comment period, and the public meeting to *The Bristol Observer*, *The Bristol Press*, and *The Hartford Courant*. A link to the press release was placed on the City's website homepage on October 23, 2008. The draft application was placed in the Bristol Public Library, the Manross Library, and the Bristol Development Authority (BDA) office in City Hall for review by the public. Written comments from the public were received in the BDA office. The City's responses to both public meeting and written comments were placed on the City's website via a link on the homepage on November 12, 2008.

In addition to print notice of the application and comment period, the Grants Administrator attended a meeting of the West End Advisory Group to invite them to participate in the public meeting and review and comment period. The West End Advisory Group is comprised of residents of the West End of Bristol who are assisting the City in its West End Study: an effort to define a vision for the future of the area and develop strategies for implementing the vision. The Mills Property is adjacent to the West End Study area.

Please find in Attachment B copies of the notices and press release, the notes and sign-in sheet from the public meeting, a summary of the written comments received from the public, and the City's response to both the public meeting and written comments.

## **Ranking Criteria**

### **1. Community Need**

#### **a. Health, Welfare and Environment**

- i) The City of Bristol, encompassing 27 square miles, has a long history of manufacturing in clock-making, brass products, primary and fabricated metals, specialty springs, wire goods, machinery, and machine and automotive parts. By 1995, the City had lost all of its significant manufacturing businesses. Unfortunately, that history has left a legacy of vacant, underutilized, and contaminated properties throughout the City. Through an informal inventory in 2001, the City identified six Brownfield sites for our EPA Assessment grant application. Since then, as the developable land area in the City has continued to shrink, the list of sites noted as potentially contaminated has become longer and has grown to seventeen. Many more sites would likely be identified as Brownfields if a formal inventory were performed. All of our identified Brownfield sites are under nine acres; ten of the sites are three acres or smaller, four sites are between three and five acres, and only three are in the five to nine acre range. Nearly 60% of the Brownfield sites, ten of seventeen, are located on the gateways to or within our downtown business district. In fact, five, or 30%, of the sites, including the Mills Property for which the City is requesting cleanup funds, are clustered in Census Tract 4061, an area encompassing only 0.62 square miles.

Of the ten sites on the gateways to or in the downtown business district, seven are vacant; within Census Tract 4061, three of the five sites are vacant. This concentration of unused, blighted, and contaminated properties lends a sense of shabbiness and hopelessness to the neighborhood. It also provides opportunity for mischief and vandalism, and promotes the use of the area by the City's indigent population. It is difficult to feel or to foster community pride and activism in an area with a concentration of run down properties.

Data from the Bristol Police Department for the period from October 8, 2007 through October 8, 2008 shows a higher incidence of criminal activity in the area including Census Tract 4061 and the neighboring Federal Hill neighborhood than for the City as a whole in a number of categories.

<b>Criminal Incident Category</b>	<b>Census Tract 4061 &amp; Federal Hill Rate</b>	<b>Citywide Rate</b>
Disturbing the Peace/Alcohol Related Incidents	12.62	8.60
Drug Related Incidents	1.24	0.80
Arrests	4.50	1.30
Assault/Domestic Disturbance Incidents	3.62	2.80
Code Enforcement/Landlord/Tenant Relations	3.20	2.30

ii) Vulnerable populations data show a striking preponderance of indicators within Census Tract 4061 as compared to the City as a whole, to the State of Connecticut, and to the nation.

<b>Data Set</b>	<b>Census Tract 4061</b>	<b>City of Bristol</b>	<b>State of Connecticut</b>	<b>United States</b>
% Elderly Residents – age 65 + <sup>1</sup>	16.9%	14.9%	13.8%	12.4%
% Children – below age 20 <sup>1</sup>	22.6%	25.1%	27.3%	28.6%
% Non English Home Speakers <sup>1</sup>	19.3%	15.8%	18.3%	17.9%
% Minority Residents <sup>1</sup>	14.0%	8.4%	18.4%	24.9%
% Minorities of Hispanic/Latino Descent <sup>1</sup>	10.5%	5.3%	9.4%	12.5%
% Female Headed Households with Children <sup>1</sup>	11.3%	6.6%	7.0%	7.2%
% Births to Mothers with Medicaid <sup>2</sup>	N.A.	35.1%	32.2%	N.A.
% Births to Teen Mothers – below age 20	N.A.	7.9% <sup>3</sup>	6.8% <sup>3</sup>	10.2% <sup>4</sup>
% Low Birth Weight Babies	N.A.	8.9% <sup>3</sup>	8.0% <sup>3</sup>	8.2% <sup>4</sup>
% Unmarried New Mothers	N.A.	33.0% <sup>3</sup>	32.0% <sup>4</sup>	36.9% <sup>4</sup>

Census Tract 4061 contains eight schools with another three schools adjacent to the area. Four of the schools provide Pre-Kindergarten (Pre-K) only with the remaining seven schools providing a range of grades from Pre-K through Grade 8. The capacity of the eleven schools is 3,663 students. Bristol-Burlington Health District (BBHD) collects asthma case data on schools providing Pre-K through High School, but not for those providing Pre-K only. According to the BBHD, asthma cases in these schools have increased over time, from 116 in the 2004-05 school-year to 164 in the 2007-08 school-year. Additionally, the schools in or approximate to Census Tract 4061 account for 31.8% of the schools for which data is collected, but contain 39% of the reported asthma cases. Clearly, the concentration of schools surrounding the Mills Property and the high incidence of asthma cases in those schools indicate the need to remove contaminants that may be impacting the health of children living in or attending school in this area.

#### **b. Financial Need**

i) The Brownfield sites that are on the gateways to and within the City’s downtown district have a detrimental effect on the City’s effort to revitalize our downtown area. Bristol has no direct highway access; therefore, the City’s gateway routes provide the first impression for visitors to our downtown. Nine Brownfield sites are located on these gateways. Of the nine gateway sites, four are located within the downtown district along

with the Mills Property for a total of five sites in the downtown area. The City has been struggling with downtown revitalization for a number of years. At present, it has created the Bristol Downtown Development Corporation (BDDC) to oversee the development of the vacant 17-acre Depot Square area, just a half mile north of the Mills Property. Attraction of interested developers is hindered by the presence of Brownfield sites along the roads leading to Depot Square as well as within walking distance of the site.

In addition to the obstacles to redevelopment posed by Brownfields in the downtown area, Census Tract 4061 is home to a disproportionate number of low income individuals and families within the City. These rates are also disproportionately high compared to the state and nation.

<b>Data Set</b>	<b>Census Tract 4061</b>	<b>City of Bristol</b>	<b>State of Connecticut</b>	<b>United States</b>
Per Capita Income <sup>1</sup>	\$17,863	\$23,362	\$28,766	\$21,587
% Individuals Below Poverty <sup>1</sup>	16.5%	6.6%	7.9%	12.4%
% Families Below Poverty <sup>1</sup>	11.8%	5.6%	4.8%	9.2%
% Families with Children Below Poverty <sup>1</sup>	18.4%	7.7%	8.6%	13.6%
% Students Eligible for Free/Reduced Lunch	N.A.	29.9% <sup>5</sup>	27.3% <sup>5</sup>	41.4% <sup>6</sup>

Unemployment rates are not available at the Census Tract level; however, the City's rate over the past six months has shown a steady increase and equals or exceeds both the state and national rates.

<b>Data Set</b>	<b>Census Tract 4061</b>	<b>City of Bristol</b>	<b>State of Connecticut</b>	<b>United States</b>
Unemployment Rate – March 2008 <sup>7</sup>	Not Available	6.5%	5.3%	5.1%
Unemployment Rate – April 2008 <sup>7</sup>	Not Available	5.0%	4.7%	5.0%
Unemployment Rate – May 2008 <sup>7</sup>	Not Available	5.8%	5.4%	5.5%
Unemployment Rate – June 2008 <sup>7</sup>	Not Available	5.9%	5.5%	5.5%
Unemployment Rate – July 2008 <sup>7</sup>	Not Available	6.2%	5.8%	5.7%
Unemployment Rate – August 2008 <sup>7</sup>	Not Available	6.6%	6.5%	6.1%

Lower educational attainment rates also plague this area of the City.

<b>Data Set</b>	<b>Census Tract 4061</b>	<b>City of Bristol</b>	<b>State of Connecticut</b>	<b>United States</b>
Less than 9 <sup>th</sup> Grade Education – age 25 + <sup>1</sup>	8.9%	6.7%	5.8%	7.4%
9 <sup>th</sup> to 12 <sup>th</sup> Grade, No Diploma – age 25 + <sup>1</sup>	15.9%	12.5%	10.2%	12.1%
% Births to Mothers without High School Diploma	Not Available	13.4% <sup>3</sup>	13.0% <sup>3</sup>	10.0% <sup>4</sup>

Additionally, housing data in Census Tract 4061 reflects a disproportionate level of need within the area.

<b>Data Set</b>	<b>Census Tract 4061</b>	<b>City of Bristol</b>	<b>State of Connecticut</b>	<b>United States</b>
% Housing Stock Pre-1939 <sup>1</sup>	47.9%	20.3%	22.3%	15.0%
% Vacant Housing <sup>1</sup>	11.1%	4.7%	6.1%	9.0%
% Renter Occupied Housing <sup>1</sup>	81.5%	38.1%	33.2%	33.8%

The data clearly shows that the City and particularly Census Tract 4061 in which the Mills Property is located is economically depressed. The State of Connecticut has recognized Bristol’s dilemma and has designated the City as a “Distressed Municipality” for the past nine years. Cleanup and reuse of the Mills Property will provide a spark that will help to ignite revitalization of the surrounding properties and, hopefully, the entire downtown district.

- ii) In addition to being designated a “Distressed Municipality” for the past nine years by the CT Department of Economic and Community Development, the City is experiencing a particularly difficult time fiscally. The state-mandated five-year property revaluation has just been completed. The effect on taxpayers is substantial. Assessments on single family homes increased 46% on average; two to four family homes increased an average of 74%; apartments with five-plus units increased 67% on average; condominiums increased 66% on average; and industrial/commercial properties increased 40% on average. In light of the effect of revaluation on the taxpayers, the City has taken a conservative approach to this year’s budget. The initial plan by the Board of Finance was to increase the mill rate by 1.5; one week before the state mandated date for municipal budget adoption the City Council and Board of Finance held a workshop to find ways to reduce that increase. The City’s adopted budget includes a mill increase of only 0.98. As the economy has deteriorated, the fiscal situation for the City has also deteriorated. On October 7, 2008, the Mayor directed all City Departments to find additional items that can be eliminated or reduced in their current operating budgets. Discussions are taking place regarding the advisability of moving forward at this time with the \$130 million closure of four outdated schools and construction of two new K-8 replacement schools. It is likely that the bulk of the school project will be delayed for at least a three-year period to allow time for positive economic change. A second major project that is being questioned is the completion of the \$4 million revitalization of Rockwell Park. It is clear that the City will not be making major investments in capital projects in the near future. The only way that we will be able to move forward with cleanup and reuse of the Mills Property is if we receive funding from EPA to defray a portion of the costs of the project.

## **2. Project Description and Feasibility of Success**

### **a. Project Description**

- i) The City proposes to perform concurrent remediation and construction of a community parking lot on the Mills Property. The property consists of three parcels. Work under this grant will be performed on two parcels of the property: specifically on the parcels known as Assessor’s Map 30 Lots 61-1A and 61-2. These parcels cover 0.4 acres of the total property acreage of 1.3 acres. The property historically housed a paper and box manufacturer from 1895 to 1985 when the property was abandoned by the owner. The

facility was destroyed by fire in 1998. The concrete building slab remains on the Assessor's Map 30 Lot 49-50 parcel. The entire property is bisected from east to west by a culverted stream historically known as Ivy Brook. Contaminants on the parcels under this grant request include ETPH, PAHs, and heavy metals above CT DEP Remediation Standard Regulation (RSR) criteria.

The City has engaged AKRF, an environmental and planning firm, to develop three conceptual designs for the property that will incorporate cleanup with the construction of the community parking lot. We have asked AKRF to focus on minimizing the cost of remediation through the design of the parking lot, creating an attractive and inviting space through the use of low maintenance native landscaping, possibly reusing the existing concrete slab and stream box culvert, incorporating vehicular and pedestrian connections to adjacent properties, and using Low Impact Development (LID) features. The three conceptual designs are scheduled to be completed by October 27, 2008. As part of this grant, the three conceptual designs will be presented to City officials and the public with an emphasis on reaching out to the residents in Census Tract 4061 in which the property is located. Upon full consideration of the community input, the City will select one of the conceptual designs for implementation. A Request For Proposals (RFP) will be developed for the competitive selection of an environmental/engineering firm to perform final design of the remediation and construction, as well as for the actual performance of the work. The City will provide and transport the necessary clean fill for the project. The City will also perform the paving of the parking lot, a portion of which will constitute an environmental cap as a remediation activity under this grant. All cleanup will meet the CT DEP RSRs.

- ii) Assessor's Map 30 Lots 61-1A and 61-2 parcels of the Mills Property contain two contiguous areas targeted for remediation based upon the ASTM E1527-00 Phase I and ASTM E1903-97 Phase II equivalent reports and the Phase III environmental site assessments that have been performed. The end use of the property as a community parking lot will facilitate remediation to the CT DEP RSR industrial/commercial criteria. It is assumed that compliance with the CT DEP RSRs will require excavation to the water table at six and a half feet in the impacted areas. Clean fill will be provided by the City on an in kind basis. The conceptual remediation plan includes both removal and encapsulation of contaminated soil, the implementation of no disturbance and no residential use ELURs, and monitoring the effect of the remediation on groundwater quality. It is expected that monitoring of groundwater will be ongoing for a two year period upon completion of the soil remediation. Depending upon environmental safety, community input, and cost, landscaping and drainage design will incorporate LID features including reuse of on site fill materials, minimizing paved areas, maximizing opportunities for stormwater treatment, and minimizing lighting impacts and energy consumption.

**b. Budget for EPA Funding and Leveraging Other Resources**

**i) Budget Table, Tasks, and Outputs**

Budget Categories	Project Tasks				
	Cooperative Agreement Oversight	Community Outreach	Legal	Remediation	Total
Personnel	\$0	\$0	\$0	\$0	\$0
Fringe Benefits	\$0	\$0	\$0	\$0	\$0
Travel	\$0	\$0	\$0	\$0	\$0
Equipment	\$0	\$0	\$0	\$0	\$0
Supplies	\$0	\$0	\$0	\$0	\$0
Contractual	\$0	\$4,000	\$0	\$137,533	\$141,533
Other-State VRP Costs	\$0	\$0	\$0	\$3,500	\$3,500
<b>Grant Request Total</b>	<b>\$0</b>	<b>\$4,000</b>	<b>\$0</b>	<b>\$141,033</b>	<b>\$145,033</b>
<b>Cost Share – In Kind</b>	<b>\$5,417</b>	<b>\$8,659</b>	<b>\$4,650</b>	<b>\$17,153</b>	<b>\$35,879</b>

Task 1: Cooperative Agreement Oversight will be provided by City staff and a Community Partner.

- The City Grants Administrator: Oversight of the Cooperative Agreement, including oversight of the RFP process to competitively procure the environmental/engineering firm to perform the project work; oversight of the firm to ensure that work is being performed appropriately and on a timely basis; approval of payments to the firm; completion of quarterly reports to EPA; entry of data into the EPA ACRES system; monitoring of expenditures to ensure compliance with the project budget; drawdown of grant funds from EPA; and evaluation of outputs and outcomes. It is projected that the Grants Administrator will spend an average of one hour per week over the three year grant period performing these tasks: 1 hour per week x 156 weeks x \$33.728 per hour = \$5,262.
- Bristol-Burlington Health District: Staff time for collection and analysis of baseline and project period school-based asthma data = \$155.

All of the above costs in this task will be provided as an in kind cost share.

Task 2: Community Outreach will be conducted by City staff and the City’s Community Partners.

- City Grants Administrator: Staff time to prepare outreach, information, and community comment response materials; receive and respond to public comments via the project’s special e-mail account; and attend 5 information meetings, an average of 1 hour per week x 156 weeks x \$33.728 per hour = \$5,262.
- City Director of Economic Development: Staff time for video taping and editing of 3 public information meetings for airing on public access television, 2.25 hours per meeting x 3 meetings x \$49.513 per hour = \$334.
- Bristol Baptist Church: Supplies and staff time for outreach to parishioners and to other faith-based organizations = \$155; Space to host public information meeting = \$62.

- Bristol Boys & Girls Club/Imagine Nation Museum: Supplies, including paper, copies, and postage; staff time for outreach to proximal child care families; and space to host public information meeting = \$263.
  - Bristol-Burlington Health District: Staff participation in 5 public information meetings = \$186.
  - Bristol Community Organization: Supplies, including paper, printing, and postage; and staff time for outreach to low income and Hispanic populations and to proximal child care families = \$310; Translation of outreach materials into Spanish = \$155; Provision of an interpreter at 3 public information meetings = \$155.
  - Bristol Preschool Child Care Center: Supplies, including paper, copies, and postage; and staff time for outreach to proximal child care families = \$207.
  - Greater Bristol Chamber of Commerce: Supplies, including paper, copies, and postage; and staff time for marketing and outreach to the business community = \$1,407; Space to host 2 information meetings for the business community = \$163.
- All of the above costs in this task will be provided as an in kind cost share.
- Environmental/Engineering Firm: Attendance at 5 information meetings and assistance in preparation of outreach/informational materials, 25 staff hours x \$160 per hour = \$4,000.

Task 3: Legal will be provided by the City's Corporation Counsel and will cover the costs associated with development of an ELUR and with filing the ELUR on the deed in the City's Land Records = \$4,650. This task will be provided as an in kind cost share.

Task 4: Remediation activities will be provided by an environmental/engineering firm and by City staff.

- Pre-Remedial Investigation: Use of Geo-Probe Rig, 1 day x \$1,800 per day = \$1,800; Field staff, 10 hours x \$110 per hour = \$1,100; Licensed Environmental Professional (LEP) management, 12 staff hours x \$160 per hour = \$1,920; Field supplies and expenses = \$300; PAHs analysis, 12 samples x \$90 per sample = \$1,080; SPLP PAHs analysis, 8 samples x \$130 per sample = \$1,040; ETPH analysis, 8 samples x \$85 = \$680; Summary report = \$3,500.
- Remedial Action Plan (RAP): Prepare RAP, 20 staff hours x \$120 per hour = \$2,400; Publications/CAD, 5 staff hours x \$110 per hour = \$550; LEP oversight and review, 10 staff hours x \$160 per hour = \$1,600.
- State Voluntary Remediation Program (SVRP) Participation: Prepare Environmental Condition Assessment Form, 20 staff hours x \$120 per hour = \$2,400; LEP review, 5 staff hours x \$160 per hour = \$800; Prepare filing form, 2 staff hours x \$110 per hour = \$220; Public notice/sign of remedial action = \$500; SVRP filing fee = \$3,000.
- Soil Remediation: Soil excavation and loading, 2 days x \$3,000 per day = \$6,000; Transportation and disposal of PAH/TPH contamination, 800 tons x \$65 per ton = \$52,000; Clean backfill and gravel, 499 cubic yards x \$16.88 per cubic yard = \$8,424; Transportation, placement, and compaction of fill and gravel, City staff hours = \$3,112; Use of City equipment for transportation, placement, and compaction of fill and gravel = \$1,841; Paved cap material, 245 square yards x \$45 per square yard = \$11,025; Laying of pavement cap material, City staff hours = \$150; Use of City equipment for laying of pavement cap = \$63. Clean fill material, transportation,

- placement, and compaction as well as laying of pavement capping material will be provided by the City as an in kind cost share.
- Remediation Coordination: LEP project management, 15 staff hours x \$160 per hour = \$2,400; Remediation oversight, 20 staff hours x \$110 per hour = \$2,200; End point sampling for PAHs and ETPH, 12 samples x \$150 per sample = \$1,800; Publications/CAD, 8 staff hours x \$110 per hour = \$880; Remediation report = \$1,920.
  - Groundwater Monitoring for 4 Quarters: Use of well installation driller, 1 day x \$2,500 per day = \$2,500; Installation of wells, 3 wells x \$350 per well = \$1,050; VOC analysis, 24 samples x \$100 per sample = \$2,400; SVOCs analysis, 24 samples x \$207 per sample = \$4,968; ETPH analysis, 24 samples x \$81 per sample = \$1,944; Total RSR 15 metals analysis, 24 samples x \$104 per sample = \$2,496; Installation oversight and sampling, 70 staff hours x \$110 per hour = \$7,700; Use of field equipment, 6 days x \$400 per day = \$2,400; LEP management, 20 staff hours x \$160 per hour = \$3,200; Annual reports, 2 reports x \$2,500 per report = \$5,000.
  - Environmental Land Use Restriction and Verification: Preparation of decision/declaration documents by LEP, 16 staff hours x \$160 per hour = \$2,560; Public notice = \$500; Preparation of final verification report by LEP, 20 staff hours x \$160 per hour = \$3,200; A-2 Survey and Topo Map, City Surveyor, 22.5 hours x \$43.41 per hour = \$977, Party Chief, 27.5 hours x \$33.63 per hour = \$925, Instrument and Rod Men, 54 hours x \$25.76 per hour = \$1,391, Draftsman, 10.5 hours x \$25.76 per hour = \$270. A-2 Survey and Topo Map preparation will be provided by the City as an in kind cost share.

## ii) Leveraging

EPA has provided funds to the City for the assessment of the Mills Property: a TBA grant that produced a Phase I and Phase II site assessment, and an Assessment grant that produced the Phase III environmental site assessment. The City has since expended \$40,000 to have a remediation and construction feasibility study done for the property. This study has resulted in three conceptual designs for the concurrent remediation of the site and construction of a community parking lot. The City expects to have sufficient funds to complete the cleanup of the property based upon this EPA grant request and the City's in kind match. The costs for construction of the community parking lot are included in the City's Five-Year Capital Improvement Program. Should the City fall short for the complete redevelopment of the property, we will apply for funds from CT Department of Economic and Community Development to fill the funding gap.

## c. Programmatic Capability

### i) Former EPA Brownfield Grants

The City received a Targeted Brownfields Assessment grant from EPA in March 1999 for Phase I and Phase II environmental site assessment at the Mills Property. The City's Grants Administrator, Robyn L. Bugbee, was the contact person for the project. Ms. Bugbee worked closely with EPA Region I staff and EPA's selected consultant, Metcalf

and Eddy, to ensure timely completion of the project. Specifically, Ms. Bugbee coordinated with the City's Corporation Counsel to ensure that ownership, via foreclosure, on the property was accomplished prior to the start of the assessment activities. She also shepherded the Consent for Access to Property form through the City's approval and signature process. Review and comment on all reports generated by Metcalf and Eddy also came under her purview. The City complied with all grant requirements.

The City also received a Brownfields Assessment Demonstration Pilots grant from EPA in April 2001. The grant was for the Phase I and Phase II environmental site assessments of four identified sites: the Gavlick Property, 51 Franklin Street; the Gavlick Property, Terryville Avenue; the J.H. Sessions Property, 273 Riverside Avenue; and the United Auto Property, 360 Riverside Avenue. A Phase III environmental site assessment of the Mills Property was also part of the grant. During the course of the grant period, EPA entered into a consent order with General Motors Corporation for the cleanup of PCB contaminated petroleum product on the Gavlick Property located on Franklin Street. At that time, the City had completed the Phase I assessments of both Gavlick properties and decided with concurrence from EPA Region I staff that further work on the two Gavlick properties by the City should be deferred until completion of work being done under the EPA consent order. Due to the length of time needed to complete the cleanup under the consent order, it became necessary to reconsider the use of the grant funds that were set aside for the Gavlick properties. The City had foreclosed on the Former Trudon & Platt Property located at 15 Downs Street, and due to its location adjacent to the Pequabuck River and its known prior use, wanted to have a Phase I performed on the property. EPA Region I approved a modification to our grant that eliminated the Phase II assessments of the two Gavlick properties and made the funds available for both Phase I and Phase II assessment activities at the Former Trudon & Platt Property. Ms. Bugbee was the project contact for this grant as well. Her involvement in the project and cooperative agreement oversight was broader than with the TBA grant. Ms. Bugbee completed all of the required documents for the development of the cooperative agreement and ensured execution by the City. She was responsible for the development of the format and for the completion and submission of all required grant reports: programmatic, financial, and closeout. EPA had not developed the ACRES system at that time. Additionally, Ms. Bugbee developed the RFP and guided the competitive procurement process for the hiring of a qualified environmental firm, HRP Associates, Inc., to perform the assessment work; acquired site access agreements from all property owners; oversaw the work and reviewed all environmental reports generated by HRP; directed and coordinated all community outreach and education activities; and coordinated with EPA Region I staff to ensure compliance with all grant conditions. The City received a grant award of \$200,000 and expended \$199,943.03; \$56.97 was unexpended. As a result of the grant, the following was accomplished:

- Phase I environmental site assessments for five properties
- Phase II environmental site assessments for three properties
- Phase III environmental site assessment for one property, the Mills Property.

The City complied with all grant conditions and there were no adverse audit findings. One difficulty that the City did experience with the grant was timely submission of

quarterly reports. At the time of the grant, Ms. Bugbee was the sole individual responsible for researching and securing grants for the entire City. These duties impacted her ability to complete the EPA reports in a timely fashion. The City has since hired a Grants Assistant to work with Ms. Bugbee and, therefore, timeliness of reporting will no longer be a concern for future EPA grant funded projects.

**ii) No Former EPA Brownfield Grants**

Does not apply.

**3. Community Engagement and Partnerships**

- a. As discussed earlier, the City has performed a Phase III environmental site assessment of the Mills Property using EPA Assessment grant funds. Part of our responsibility under the grant was community outreach and dissemination of information regarding the outcomes of the Phase III assessment. A public meeting was held upon the conclusion of the assessment to inform the community of the types and degrees of contamination that were found, to propose potential reuse of the site, to answer any questions or concerns from the community, and to receive community input on future site cleanup and reuse. The City proposed cleanup to CT DEP industrial/commercial RSRs and reuse of the property as a parking lot for the Bristol Board of Education. The participants in the public meeting agreed that the property should be redeveloped as a parking lot, but overwhelmingly felt that the usage should not be restricted solely to the Board of Education. The City has continued to reach out to the community regarding the property reuse since the completion of the grant. Based upon community wishes and direction from City planning and land use boards, the City has decided that the site will be used as a community parking lot. This use will be beneficial to nearby social service and arts groups, private businesses, and neighborhood residents.

It is important to the City that the community engagement that occurred with our previous work on the site continues as we move forward with cleanup and redevelopment activities. To that end, the City has engaged AKRF to develop three conceptual designs for the concurrent cleanup and construction of the community parking lot. These conceptual designs will be the subject of the City's first community outreach public meeting so that the community's voice will become a major factor in the final selection of remedial/construction design. Additional public meetings will be held at the mid-point of the project to provide information, answer questions, and receive comments on project progress. A third public meeting will be held close to the conclusion of construction. Two additional information meetings will be held for members of the Greater Bristol Chamber of Commerce (GBCC) to inform the business community of the work and to solicit their input. Meetings will be scheduled in the early evening to accommodate the needs of working families. The meetings for the general public will be held in locations close to the site: The Imagine Nation Museum, the Bristol Baptist Church, and City Hall. Meetings for the business community will be held at the GBCC. In addition to public meetings, the City, in conjunction with our consulting firm and Community Partners, will develop informational flyers that will be distributed to the community at large with special emphasis on residents and businesses located in Census Tract 4061 in which the site is located. All written materials for both meetings and general distribution will be provided in Spanish and English. A Spanish speaking interpreter will

attend all public meetings to ensure that information presented and received is understood by all. Public meetings will be taped by City staff and will be aired on Nutmeg Public Access TV. A link to outreach and informational materials will be placed on the City's website homepage. A special e-mail account will be created by the City for the project. The Grants Administrator will receive and respond to all e-mail sent to the special project account.

- b. The City, as well as its environmental consultant, will work closely with CT DEP through the State Voluntary Remediation Program. The City Planning Commission and Inland Wetlands Commission will continue to provide project input through the approval and permitting processes. The Bristol-Burlington Health District will be a Community Partner in the project by providing baseline and project period collection and analysis of school-based asthma data, and by participating in all project information meetings.
  
- c. Six community-based organizations have committed to being a Community Partner in this project. Letters of commitment are enclosed as Attachment C.
  - Bristol Baptist Church (BBC) is located one building away from the site and houses a preschool child care program. BBC has committed to assist in community outreach with emphasis on its parishioners and other faith-based organizations. BBC will host a community public meeting.
  - Bristol Boys & Girls Club's Imagine Nation Museum (BBGC or Museum) is located diagonally across the street from the site. This children's museum is frequented by approximately 45,000 local and state visitors yearly. It also houses a child care program. BBGC sponsors additional child care facilities in the neighborhood. The Museum has committed to hosting our first community public meeting and to outreach to all the BBGC child care families including distribution of flyers and brochures.
  - Bristol-Burlington Health District (BBHD) is our local public health agency. BBHD has committed to collect and analyze school-based asthma data, both baseline and throughout the project period. BBHD will also provide staff at all information meetings to ensure that the public understands the health and welfare implications of the cleanup.
  - Bristol Community Organization (BCO) is the local community anti-poverty agency and is located in the site neighborhood. BCO has committed to outreach to its middle and low income clients, Head Start families, and to the Hispanic population. Additionally, BCO will translate all outreach and educational materials into Spanish and will provide a Spanish-speaking interpreter for the community public meetings.
  - Bristol Preschool Child Care Center (BPCCC) provides preschool experience and child care to families, with an emphasis on low income families. One BPCCC site is located in the Bristol Baptist Church. BPCCC has committed to provide outreach including distribution of flyers and brochures to its child care families.
  - Greater Bristol Chamber of Commerce (GBCC) serves the business community of six municipalities in central Connecticut and has 1,800 members. GBCC has committed to assist in the marketing of the project including distribution of flyers and brochures. GBCC will also host two information meetings for its members.

#### **4. Project Benefits**

##### **a. Welfare and/or Public Health**

The Mills Property has been vacant since 1985. The City has taken steps to secure the property and to limit public access since the completion of the Phase III environmental assessment. However, this property is an eyesore, at best, in a mixed use neighborhood. The residential population is mostly low to middle income and elderly. It also houses the City's largest Hispanic population. There is a preponderance of child care facilities that cater to low income families in the area as well. The area is also home to small retail and commercial operations as well as to a number of service agencies. This neighborhood needs added parking, but even more importantly it needs to have this property become an asset. The site cleanup will adhere to the CT RSRs for industrial/commercial Direct Exposure Criteria and Pollutant Mobility Criteria for soils, and the Surface Water Protection Criteria and Volatilization Criteria for groundwater. The number and range of sensitive populations in the vicinity of the site will necessitate adherence to stringent health and safety measures during the cleanup. The City will place a strong emphasis on this in the selection of the cleanup/construction firm for the project. The site remediation activities will adhere to a strict on site soil management plan that will include provisions for soil stockpiling including covering stockpiles and minimizing on site storage of contaminated soils, fugitive dust control, and perimeter air monitoring as required. The remediation activities will be monitored on a full time basis by the City's cleanup/construction firm.

##### **b. Economic Benefits and/or Greenspace**

- i) Because the site will be used as a community parking lot owned by the City, there will be no increase in tax base. Employment increases will occur only during cleanup and construction. The primary economic benefit will be the increased accessibility to and use of surrounding businesses and organizations that have suffered due to a lack of parking availability. It is anticipated that pedestrian traffic will also improve in local businesses since a pedestrian walkway from Church Street to Main Street is planned as part of the parking lot construction. Mafale's Plaza and Walgreens Drug Store will benefit from both the extra parking and the vehicular and pedestrian access that will be created. Field trips to The Imagine Nation Museum by local and out of town child care facilities will be facilitated by creation of bus parking spaces. Melnick Metals will gain easier truck access to its adjacent manufacturing facility through the traffic ways within the community parking lot. Bristol Community Organization is anticipating the loss of thirteen parking spaces in its current lot and will use the new community parking lot to compensate for the loss.
- ii) Other non-economic benefits of the project will be the addition to the community parking lot of native landscaping, decorative lighting, decorative fencing/walls, and public art at the entrance located on Church Street. While we are not able to incorporate open space into the project, we will develop an attractive space that will welcome residents and visitors and instill pride in the neighborhood. The City's commitment to an environmentally responsible and aesthetically pleasing parking

area is reflected in our site feasibility/alternatives analysis which relies heavily on Landscape Architecture design.

**c. Environmental Benefits from Infrastructure Reuse/Sustainable Reuse**

The Mills Property contains a concrete slab that was the footprint of the manufacturing facility. This slab is not structurally sound for vehicular use and must be removed. The slab will be crushed on site and be used as fill to replace removed contamination or to alter grades. The City will provide any additional clean fill that may be needed from its reserves on other City owned properties. The site is connected to City utilities and these will be used for the planned lighting and for maintenance of the parking lot. The City charged AKRF, our feasibility study consultant, with creating remediation and construction designs that would incorporate Low Impact Development (LID) features. These may include the use of swales and other LID stormwater containment components. All landscaping will exclusively utilize low maintenance native species. Overall, the project will result in an increase in surface water quality in the area as a result of controlling site run off, minimizing suspended soils in stormwater, and eliminating soil contaminant interface with site stormwater flows.

**d. Plan for Tracking and Measuring Progress**

The City's Grant Administrator will be responsible for tracking, measuring, and reporting project progress. All required EPA programmatic and financial reports will be completed and submitted on a timely basis. Project data will be entered into the ACRES system. Upon completion of the community parking lot, projected users will be contacted semi annually to gather usage data. Crime statistics from the Bristol Police Department will be analyzed annually to determine if the cleanup and reuse of the property has had an effect. Bristol-Burlington Health District will collect and analyze school-based asthma case data. Community Partners will be asked to provide semi annual anecdotal reports regarding the reactions of their constituent populations to the property improvements and any positive changes in neighborhood pride and satisfaction.

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<sup>1</sup> US Census Bureau, Census 2000

<sup>2</sup> CT Voices for Children, *Births to Mothers with Medicaid by Town, 2005*

<sup>3</sup> CT Department of Public Health, CT Registration Report, 2005

<sup>4</sup> US Department of Health & Human Services, National Vital Statistics System, 2005

<sup>5</sup> CT State Department of Education, Strategic School Profile, Bristol, CT School District, 2006-2007

<sup>6</sup> National Center for Education Statistics, Common Core of Data, 2005-2006

<sup>7</sup> CT Department of Labor, Unemployment Statistics