ANALYSIS OF BROWNFIELDS CLEANUP ALTERNATIVES

FAIRFIELD HILLS CAMPUS HAZARDOUS SUBSTANCES REMOVAL

DANBURY HALL AND EIGHT SINGLE FAMILY HOMES

UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

BROWNFIELDS CLEANUP GRANT

PREPARED FOR:

TOWN OF NEWTON, CONNECTICUT

PREPARED BY:

ELIZABETH STOCKER, AICP

DIRECTOR OF ECONOMIC AND COMMUNITY DEVELOPMENT, TOWN OF NEWTOWN

AND

KIMBERLY M. CLARKE, L.E.P.

EOLAS ENVIRONMENTAL, LLC

APRIL 2013

Table of Contents

1 Introduction

This document presents an Analysis of Brownfields Cleanup Alternatives (ABCA) for Danbury Hall and eight Single Family buildings at the Fairfield Hills Campus property in the Town of Newtown, Connecticut. This ABCA was prepared by Elizabeth Stocker, AICP, Town of Newtown Director of Economic and Community Development, and Kimberly M. Clarke, L.E.P., Eolas Environmental, LLC, on behalf of the Town of Newtown as part of a United States Environmental Protection Agency (EPA) Brownfields Cleanup Grant award. This document is a draft format and will be revised pursuant to public comment and following technical review.

1.1 Purpose and Scope

Under the EPA Brownfields Grant, recipients must supply an ABCA that includes:

- Information about the site and contamination issues (i.e. exposure pathways, identification of contaminant sources, etc.), cleanup standards, applicable laws, alternatives considered, and the proposed cleanup method;
- Effectiveness, implementability, and the cost of alternatives, including the preferred or proposed cleanup alternative;
- A comparative analysis of the alternatives considered; and
- Assessment of whether additional land-use controls will be necessary after the environmental cleanup is complete.

2 Site Description and History

The Fairfield Hills Campus is the location of the former State of Connecticut Mental Health Hospital property. The campus is located to the south of Wasserman Way in Newtown, Connecticut (see the attached “Location Map, Fairfield Hills, Newtown, CT”). The hospital was operated by the State of Connecticut from the mid 1930s until it was closed in 1996. The property was farmland prior to the purchase and development of the property by the State.

The portion of the property that contains the institutional buildings, the “campus” portion of the property, and a portion of the property along Deep Brook, was offered by the State of Connecticut to the Town of Newtown for purchase. As part of the offer, the environmental remediation of soil and groundwater contamination and the removal of hazardous materials and ACM were to be the responsibility of the Town.

After deliberation by town officials, a study by a committee established by the Town, and public input, the Town decided to purchase the property and create a master plan of redevelopment. The master plan indicated a mix of uses through the renovation and leasing of existing buildings or new construction to replace buildings, with the Town retaining ownership of the buildings and land.

Environmental remediation of the soil and groundwater to State of Connecticut Department of Energy and Environmental Protection (CTDEEP) standards is complete and redevelopment is underway. To date, five buildings (Bridgewater, Fairfield, Greenwich, Litchfield, and Yale) have

been demolished. Two additional buildings have been renovated for municipal office space (a new town hall), and one building has been converted into a municipal Emergency Operations Center (EOC). Additionally, a town baseball field has been constructed on the campus. Prior to demolition and renovation of the buildings, hazardous substances and ACM were removed in accordance with state regulations and prevailing guidance.

Hazardous building materials, including ACM, have also been removed from six additional buildings (five duplexes and Stratford Hall) which are now available for renovation and reuse.

Private concerns have expressed interest in leasing and renovating existing buildings for various enterprises, but no deals have yet been consummated. This is likely due, in large part, to the poor economy and lack of financing, but also because of the cost of building renovations. A significant portion of the cost of these renovations is the removal of hazardous substances and ACM from the buildings.

In the Fall of 2011, the Town applied to the United States Environmental Protection Agency (EPA) for a Brownfields Grant to remove hazardous substances and ACM from Danbury Hall and eight single-family dwellings. See the attached annotated "Fairfield Hills Campus Layout Plan" figure for the locations of these buildings on the Fairfield Hills Campus. The purpose of this project is to eliminate the potential exposure of the public, town personnel, and contractors to these materials, and to facilitate demolition of these buildings.

This EPA Brownfields Grant is being used to provide project coordination; provide community outreach services; secure an environmental engineering consultant to prepare the final ABCA, a National Emission Standards for Hazardous Air Pollutants (NESHAPs) and Asbestos Hazard Emergency Response Act (AHERA) asbestos sampling inspection, hazardous substances and asbestos-containing materials removal specifications, to oversee and monitor the removals; and to pay for the removal and disposal of the materials.

3 Hazardous Substances On-Site

The hazardous materials at the buildings include ACM, lead-based paint, and building components and contents containing miscellaneous hazardous substances as summarized below. The inventory of hazardous materials at the buildings were estimated by performing an initial assessment of ACM by a Connecticut licensed asbestos inspector, sampling inspections of lead-based paint of similar campus buildings, and general industry knowledge of materials and equipment containing hazardous substances. A complete sampling inspection and inventory of ACM, lead-based paint, and building components and contents containing miscellaneous hazardous substances will be performed for these buildings as part of the preparation of the abatement plans and specifications to be completed following the determination of the preferred alternative for abatement.

3.1 Asbestos-Containing Materials

A Connecticut Licensed Asbestos Inspector from TRC Environmental Corporation performed an initial assessment on three of the eight single family buildings in 2011. The ACM in each of the buildings are estimated in the reports dated June 2011.

Asbestos is a concern because asbestos minerals have a tendency to separate into microscopic particles that can remain in the air and are easily inhaled. Persons occupationally exposed to asbestos have developed several types of life-threatening diseases, including asbestosis and lung cancer. Although the use of asbestos and asbestos products has dramatically decreased, they are still found in many residential and commercial settings and continue to pose a health risk to workers and occupants.

Exposure to asbestos would be likely to occur in those areas identified as containing friable ACM. Since the ACM identified are currently damaged or have the potential for significant damage, it may be assumed that airborne asbestos fibers are present in the buildings and will continue to be present in the buildings, if the ACM are not abated. The main exposure pathway in this case would be inhalation of airborne particles for those inside the buildings. Additional exposure could occur through ingestion. Indirect exposure could occur through transport of asbestos particles out of the buildings on occupants' clothing or hair, with subsequent inhalation (or ingestion).

Additional exposure to asbestos can be expected from identified areas of non-friable asbestos-containing materials, if any future maintenance or renovation activities will result in damage to these materials. Such damage could occur during activities such as drilling or cutting of existing asbestos-containing flooring/mastic material. Typical maintenance activities such as floor polishing or buffing could also cause release of fibers. Under these conditions, the exposure pathways would be the same as described above.

3.2 Lead-based Paint

Lead-based paint surveys of Fairfield Hills Campus buildings have shown that the white trim paint on the buildings contain significant concentrations of lead. The lead content of Interior paints varies.

Exposure pathways for lead-based paint include inhalation and ingestion of lead dust from the deterioration of lead-based paint and ingestion of paint chips or paint. Increased levels of the metal lead in the blood due to inhalation or ingestion of lead may cause irreversible neurological damage as well as renal disease, cardiovascular effects, and reproductive toxicity.

3.3 Miscellaneous Hazardous Substances

Regulated hazardous substances can be contained in the following building components, and materials that may remain in the buildings. Below are items that may remain in the buildings that can contain hazardous substances:

- Mercury Lamps from fluorescent or mercury vapor light fixtures
- PCB/DEHP Ballasts from fluorescent light fixtures
- PCB caulks and paint

- Smoke detectors
- Exit signs
- Water fountains
- Mercury Thermostat Ampules
- Halogen bulbs
- Unknown liquids
- Disinfectants
- Transformers
- Fire alarm control panels
- Batteries
- Fuel sensor control panels
- Emergency lighting control panels
- Flood lamps

Exposure pathways to regulated hazardous substances contained in the building components and materials remaining in the building will depend upon the state of the hazardous substance but can include inhalation, ingestion, and dermal contact. Health effects to these exposures will vary by the substance, the type of contact, and the level and duration of the exposure.

4 Nature of Threat to Public Health

The current threat to public health is the exposure to asbestos, lead-based paint dust, and miscellaneous hazardous substances by individuals entering the building. Certain ACM and lead-based paint in the buildings are in poor condition that could cause the release of asbestos fibers to the air, and lead paint chips to building floors and surfaces. Lead dust can be created by walking on and disturbing lead-based paint chips on the floors of the buildings.

These buildings are currently vacant and are slated for campus redevelopment that will involve demolition of the buildings. Under current conditions, risk pathways include: ingestion, and inhalation of potentially hazardous materials and substances by site visitors and/or trespassers.

During any renovation or demolition activities, ACM, lead-based paint, and miscellaneous hazardous substances remaining in the building will potentially pose an exposure risk to site construction workers through inhalation, ingestion, and contact.

5 Cleanup Standards

Even though cancer risk from exposure to asbestos is most appropriately viewed as a chronic concern, short-term standards have been established by Occupational Safety and Health Administration (OSHA) to limit exposures of workers in the workplace. There are two types of short-term limits, as follows:

STEL (Short-term exposure limit): 1.0 PCM f/cc (fibers per cubic centimeters as detected using phase-contrast microscopy)

TWA PEL (8-hr time-weighted average [TWA] permissible exposure level [PEL]): 0.1 PCM f/cc (Source: EPA, 2003 - Libby Asbestos Site Residential/Commercial Cleanup Action Level and Clearance Criteria Technical Memorandum, Draft Final - December 15, 2003).

EPA AHERA regulations, (40 CFR 763) require aggressive clearance sampling after asbestos abatement activity. Leaf blowers and fans are used to disturb interior air and air samples are collected according to the standard method set forth in Appendix A of Subpart E of 40 CFR Part 763. The clearance criteria as set forth in this regulation are:

- PCM clearance criteria (for small areas): 0.01 f/cc
- TEM clearance criteria: 70 structures/mm^2 on the filter, or no significant increase from exterior air sample results

Although AHERA regulations apply to abatement in schools, the same standards are generally used for all abatement projects.

The EPA issued a final rule regarding dangerous levels of lead in pre-1978 housing and children-occupied buildings January 5, 2001 (40CFR Part 745). Under the new standards, lead is considered a hazard if there are greater than:

- 40 micrograms of lead in dust per square foot on floors;
- 250 micrograms of lead in dust per square foot on interior window sills; and
- 400 parts per million (ppm) of lead in bare soil in children's play areas or 1200 ppm average for bare soil in the rest of the yard.

6 Applicable Laws and Regulations

The following are applicable laws and regulations for ACM, lead-based paint, and materials containing miscellaneous hazardous substances.

6.1 Asbestos Laws and Regulations

Asbestos is regulated by the AHERA, the Toxic Substances Control Act (TSCA), the Clean Air Act (CAA), the National Emission Standards for Hazardous Air Pollutants (NESHAPs), and Regulations of Connecticut State Agencies (RCSA), Sections 19a-14, 19a-17, 19a-332 to 19a-333, 20-435 to 20-442.

Further, to protect asbestos abatement workers, all asbestos abatement work must be performed in accordance with OSHA asbestos regulations as promulgated in Title 29 of the Code of Federal Regulations (29 CFR), Section 1926.1101.

The following work practices should be followed whenever demolition/renovation activities involving asbestos-containing materials occur:

- Prepare abatement specifications by a Connecticut Department of Public Health licensed Asbestos Designer;
- Notify the Connecticut Department of Public Health of intention to demolish/renovate by the required notification form and receive approval for abatement activities;

- Remove all ACM from facility being demolished or renovated before any disruptive activity begins;
- Handle and dispose of all asbestos-containing materials in an approved manner (EPA, 2006a; Asbestos/NESHAP Regulated Asbestos-Containing Materials Guidance);
- Monitor asbestos abatement activities by a Connecticut Licensed Asbestos Project Monitor and Abatement Supervisor;
- Perform air clearance testing upon completion of ACM abatement; and
- Prepare an asbestos abatement Compliance Report.

6.2 Lead-Based Paint Laws and Regulations

Lead-based paint in pre-1978 housing and children-occupied buildings is regulated under the authority of the Toxic Substances and Control Act (TSCA; 15 U.S.C. 2601 et seq.) as amended by the Residential Lead-Based Paint Hazard Reduction Act of 1992, generally referred to as Title X (of The Housing and Community Act of 1992 - Public Law 102-550). Title X mandates the training, certification and licensing of lead-based paint abatement contractors, inspectors, risk assessors, and the training and certification of abatement workers and project designers. The Act also amended the TSCA section 402 & 403. The provisions of Title X apply to residential buildings and child-occupied facilities.

The EPA issued a final rule regarding dangerous levels of lead in pre-1978 housing and children-occupied buildings on January 5, 2001 (40 CFR Part 745). Under the new standards, lead is considered a hazard if there are greater than:

- 40 micrograms of lead in dust per square foot on floors;
- 250 micrograms of lead in dust per square foot on interior window sills and
- 400 ppm of lead in bare soil in children's play areas or 1200 ppm average for bare soil in the rest of the yard.

The Connecticut Department of Public Health regulates and licenses lead paint consultants and workers under RCSA Sections 20-474 through 20-482 and lead-containing debris must be handled in accordance with the EPA RCRA Hazardous Waste Regulations (40 CFR Parts 260 through 274), and the Connecticut Department of Environmental Protection Hazardous Waste Regulations (22a-209-1 and 22a-449(c).

OSHA has published regulations regarding worker safety during activities involving lead-based paint abatement. The Construction Standards (29 CFR Part 1926) and the Occupational Safety and Health Standards (29 CFR Part 1910) promulgate a PEL for lead construction workers, including workers performing demolition, salvage, or renovation of lead-containing materials at sections 1926.62 and 1910.1025 as follows:

> "The employer shall assure that no employee is exposed to lead at concentrations greater than fifty micrograms per cubic meter of air (50 ug/m^3) averaged over an 8-hour period." (29 CFR 1926.62)

Additional regulations under these chapters address other worker safety precautions such as respiratory protection programs, work practices, and medical monitoring.

Lead-based paint debris (material containing or surfaced with lead-based-paint) from commercial buildings may be classified as hazardous waste if lead concentrations exceed the Toxicity Characteristic Rule (40 CFR 261.24, 40 CFR 262.11) concentration limit of 5.0 milligrams per liter (mg/l) in sample extract prepared according to the Toxicity Characteristic Leaching Procedure, test Method 1311 in "Test Methods for Evaluating Solid Waste, Physical/Chemical Methods", EPA Publication SW-846.

6.3 Miscellaneous Hazardous Substances Laws and Regulations

Activities involving building components and materials left in the building that may contain miscellaneous hazardous substances shall be performed in accordance with, but not limited to, the current revision of the EPA and CTDEEP Hazardous Waste Regulations (40 CFR 260-282, 22a-209 and 22a-449(c)), EPA PCB Regulations (40 CFR 761), EPA Protection of Stratospheric Ozone (40 CFR 82), OSHA Hazard Communication (29 CFR 1910.1200), OSHA Hazardous Waste and Emergency Response Regulations (29 CFR 1910.120), United States Department of Transportation (CTDOT) Hazardous Materials Regulation (49 CFR 171-180), OSHA, RCRA, CERCLA, CAA, TSCA, and all other laws and regulations.

7 Analysis of Cleanup Alternatives

Reasonable Alternatives for hazardous substances abatement considered for the Fairfield Hills Danbury Hall and eight Single Family Dwelling buildings include Alternative 1 the No-Action Alternative; Alternative 2 consisting of removal of high-risk ACM, building components and materials remaining in the buildings containing miscellaneous hazardous substances, and lead-based paint; and Alternative 3 consisting of complete removal/abatement of existing asbestos-containing material and lead-based paint, and removal of building components and materials remaining in the buildings containing miscellaneous hazardous substances. The Town of Newtown prefers Alternative 3 as the method of cleanup for the buildings. A short summary of each of these alternatives is provided below:

Alternative 1: No-Action. A no-action alternative would leave the buildings in their present condition, making them unusable for use, and difficult to obtain private interest for the renovation and reuse of the buildings. The only advantages to no action are those related to immediate avoidance of expenses that would be incurred by taking action. However, in the long term, expenses associated with no action may exceed those related to taking action at the present time due to the continued deterioration of the condition of the buildings, an inability to lease the buildings for renovation and reuse, and potential exposures to and liability associated with unauthorized entrants. Leasing and renovation of the buildings will eliminate potential

impacts to human health and the environment due to their present conditions and generate funds for hazard abatement and reuse of other buildings on the campus.

Alternative 2: Removal of High Risk Asbestos, Lead-Based Paint, and Miscellaneous Hazardous Materials: This alternative would address deteriorated and friable asbestos-containing materials and deteriorated lead-based paint in the interior of the buildings including asbestos pipe insulation, asbestos floor tiles and mastic, asbestos ceiling tiles and/or associated glue daubs, lead-based paint chips, and pealing lead-based paint. This alternative will also remove miscellaneous hazardous substances contained in the buildings.

Alternative 3: Removal all Asbestos-Containing Materials, Lead-Based Paint and Miscellaneous Hazardous Materials: This option would include all of the activities associated with Alternative 2 but also include removal of asbestos-containing window caulking and glazing, removal of asbestos transite roofing shingles and roofing tars, and removal of all lead-based paint. This alternative has all of the advantages of Alternative 2 and has the additional advantage of the removal of all asbestos and lead-based paint. This alternative is the preferred alternative as, once comprehensive hazardous materials, including lead and asbestos, removal is complete, buildings can be demolished allowing for sustained protection of public health and the environment, and overall site redevelopment.

The objective of the Fairfield Hills Campus' Danbury Hall and Single Family Dwelling buildings Brownfields Cleanup Project is to eliminate the potential exposure to asbestos, lead, and other miscellaneous hazardous substances for individuals entering the buildings, and to facilitate the demolition of the buildings. The following sections describe the three alternatives considered in terms of their effectiveness, feasibility of implementation, and costs with regard to achieving the project objectives.

7.1 Alternative 1: No-Action Alternative Analysis

Effectiveness: The effectiveness of the No-Action alternative in achieving project goals would be negligible. The continued presence of ACM, lead-based paint, and miscellaneous hazardous substances in buildings, as would be the case under the no-action alternative, would pose a long-term health risk to the public and also to workers entering the buildings. Also, the presence and projected costs of removal of the materials will make it difficult to obtain private interest in leasing and renovating/reusing the buildings. The no-action alternative would be highly ineffectual in achieving the goals of reduction of health risks and facilitating the demolition of the buildings.

Implementation: Implementation of the No-Action alternative would be fairly straightforward. The buildings would be left in the current unused state in which they currently exist. The identified ACM and lead-based paint would still pose a hazard to those entering the buildings. The buildings would not be demolished and the reclamation of the open space would not occur.

Transfer and/or lease of the property to other parties would require notification of the presence of asbestos-containing materials, lead-based paint, and miscellaneous hazardous substances; and controls would be necessary to manage exposure to those entering the buildings.

Under the No-action Alternative, if the buildings remain unused for an extended period of time, the buildings will continue to deteriorate increasing the risk to those entering the buildings and making it more difficult to obtain private interest in leasing and renovating/reusing the buildings nearby. The buildings do not have reuse value and they are detracting from the redevelopment of the campus.

Cost: Direct costs associated with the No-Action Alternative and associated non-use of the buildings would consist of providing site security. Indirect costs could include the continuing inability to obtain private interest for the leasing and renovation/reuse of buildings nearby and potential liability associated with unauthorized entrants into the buildings.

7.2 Alternative 2: Removal of High Risk Asbestos and Lead-Based Paint Analysis

Alternative 2 would involve removal of high risk deteriorated and friable ACM from the interior of the buildings including asbestos pipe insulation, asbestos floor tiles and mastic, asbestos ceiling tiles and/or associated glue daubs, lead-based paint chips, and pealing lead-based paint. Miscellaneous hazardous substances will also be removed. Non-friable transite roofing tiles and window caulking/glazing, and interior paint would be removed to ready the buildings for demolition.

Effectiveness: Alternative 2 would be effective at removing high risk ACM, lead-based paint, and miscellaneous hazardous substances related health hazards to individuals entering the buildings; however, Alternative 2 would be limited in that all ACM, lead-based paint, and miscellaneous hazardous substances will require eventual removal in order to demolish the buildings.

Implementation: Implementation of Alternative 2 would be performed by certified asbestos and lead abatement contractors. All friable asbestos pipe insulation, asbestos tile debris, floor tile and mastic, and ceiling tile and associated glue daubs would be removed. In addition, interior lead-based paint chips and loose lead-based paint would be removed. Miscellaneous hazardous substances will also be removed by the abatement contractor performing asbestos and lead-based paint removal.

Cost: A State of Connecticut Department of Health approved asbestos abatement contractor has estimated the cost of this work using established state/municipal contract rates at approximately $61,665 for three of the eight single family buildings. In addition, AHERA sampling and analysis of the buildings, paint XRF sampling of paint, inspection report preparation, and management and asbestos abatement monitoring/reporting costs will increase the total estimated cost.

7.3 Alternative 3: Abate all Asbestos-Containing Materials and Lead-Based Paint Analysis

Alternative 3 would completely abate all ACM and lead-based paint from the buildings.

Effectiveness: Alternative 3 would be highly effective in achieving the goal of reduction potential exposures to asbestos and lead for individuals entering the buildings. Alternative 3 would be effective for the goal of facilitating the demolition of the buildings for removal.

Implementation: Implementation of Alternative 3 would be performed by certified asbestos and lead abatement contractors. In addition to the asbestos-containing materials and lead-based paint to be removed in Alternative 2, removal of asbestos-containing window caulking and glazing, removal of asbestos transite roofing shingles and roofing tars, and removal of all lead-based paint including paint in good condition would be removed. This includes windows, layered roofing/flashing, and transite roofing shingles.

8 Alternatives Evaluation and Recommendation

An Analysis of Brownfields Cleanup Alternatives (ABCA) has been performed for hazardous substances abatement alternatives at the Town of Newtown Fairfield Hills Campus' Danbury Hall and Single Family Dwelling buildings that are to be addressed using monies provided by the EPA Brownfields Grant. Three alternatives were considered for implementability, cost, and effectiveness:

1. No Action

2. Removal of High Risk Asbestos, Lead-Based Paint, and Miscellaneous Hazardous Substances.

3. Abate all Asbestos-Containing Materials, Lead-Based Paint, and Miscellaneous Hazardous Substances.

Based upon an evaluation of these criteria, it is determined that Alternative 3 Abate all Asbestos-Containing Materials, Lead-Based Paint and Miscellaneous Hazardous Substances, is the preferred alternative. It meets the implementability and effectiveness criteria at a cost that is compatible with the funds available. Neither of the other two options meets the criteria for demolition and eventual site redevelopment and improvement. The evaluation is summarized in the tables below.

Table 1: Summary of Evaluation Criteria

Alternative		Effectiveness	Implementability
1	No Action	Not Effective	Implementable
2	Removal of High Risk Asbestos and Lead-Based Paint	Effective	Implementable
3	Abate all asbestos-containing materials and lead-based paint	Effective	Implementable

9 Authorization and Implementation

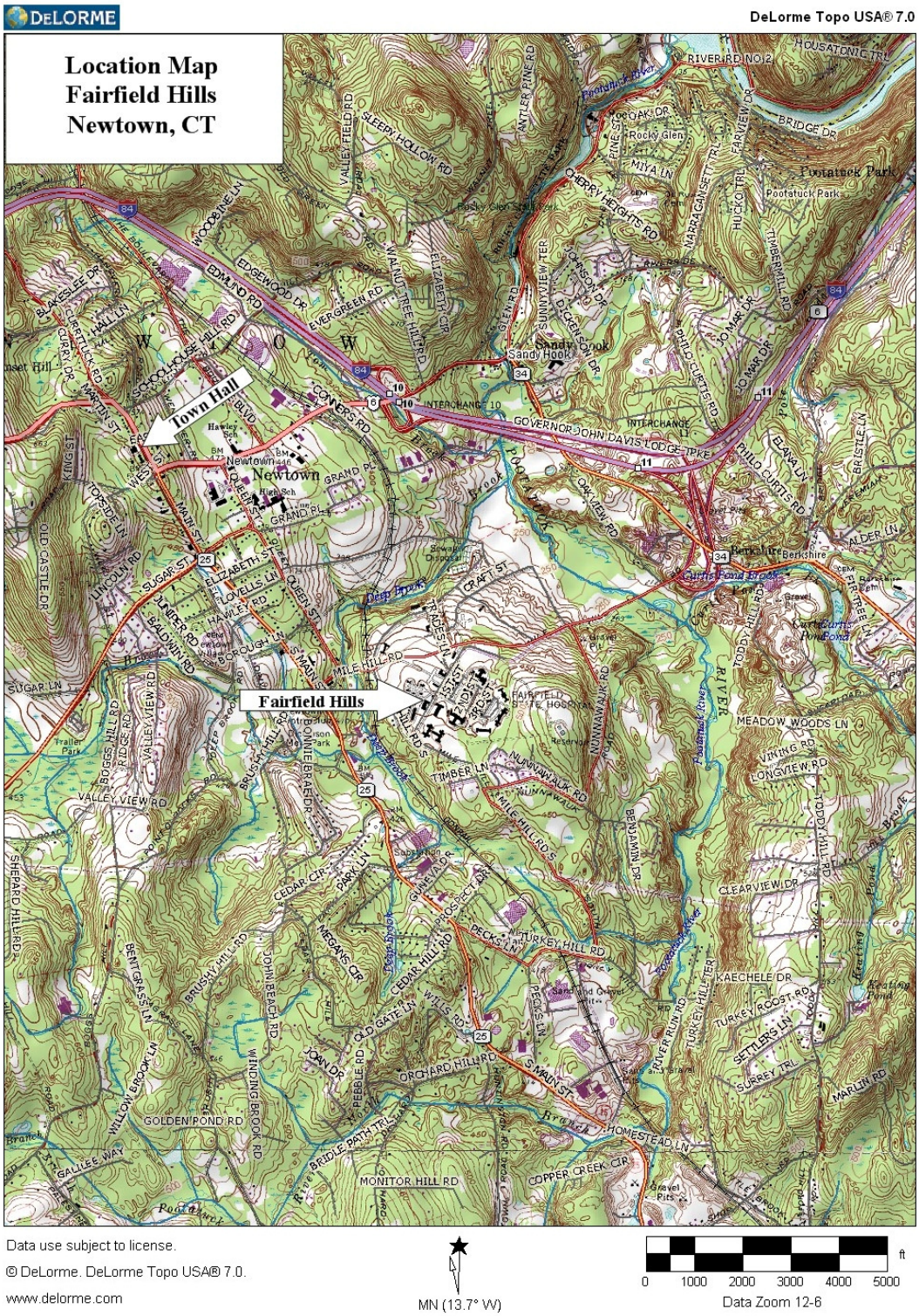
The Town of Newtown, as a government entity, is authorized under CERCLA 104(k) to perform cleanup activities at the Fairfield Hills Campus. The site is eligible as it is not listed or proposed for listing on the National Priorities List. It is not subject to unilateral administrative orders, court orders, administrative orders on consent, or judicial consent decrees issued to or entered into by parties under CERCLA. It is not subject to the jurisdiction custody, or control of the United States government.

The Town of Newtown has contracted with Eolas Environmental, LLC for consulting services on the project. Preliminary assessments of the quantities of ACM have been performed by a State of Connecticut Licensed Asbestos Inspector from TRC Environmental Corporation.

Upon completion of review of this ABCA, the comment period, consideration of comments, and final decision of the Town of Newtown, the selected cleanup will be implemented. Implementation will consist of the performance of detailed ACM and lead-based paint sampling inspections of Danbury Hall and the five remaining single family dwellings, the preparation of abatement plans and specifications, notification of abatement to the CTDPH, implementation of the abatement by award under State of Connecticut existing asbestos and lead abatement contracts containing fixed rates, the monitoring of the abatement work including clearance sampling, and the production of post-abatement compliance reports.

Sufficient grant funds may be available to complete work on all buildings. In addition to the costs detailed herein there are other administrative and engineering costs such as costs associated with public participation and the costs for initial planning and engineering. Also, actual bids and costs may exceed estimates.

The Brownfields Cleanup will conform to all applicable local, state, and federal laws. Connecticut certified asbestos and lead inspectors, designers, and abatement contractors will be used to perform all abatement activities.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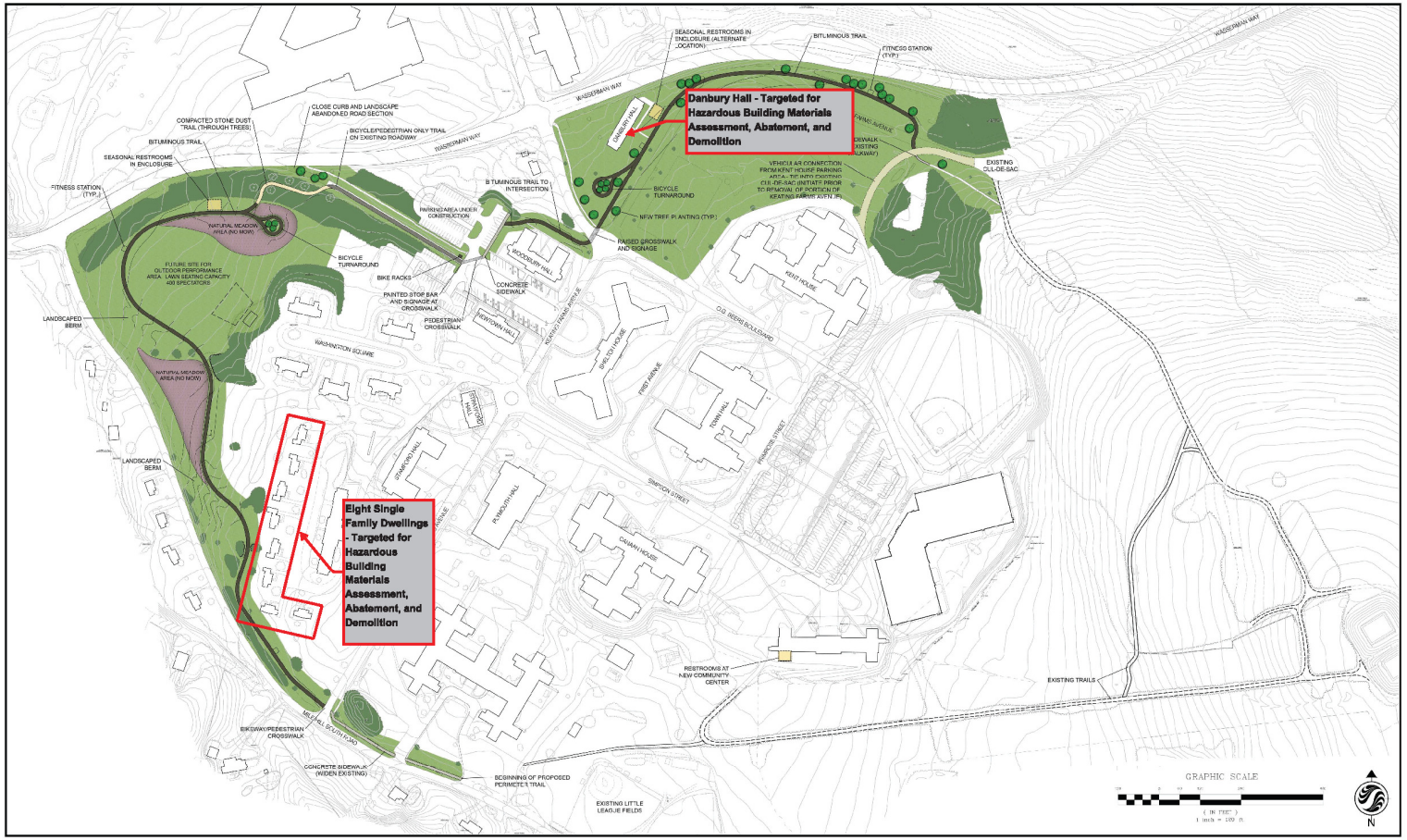

FAIRFIELD HILLS CAMPUS
NEWTOWN, CT

LAYOUT PLAN
MARCH 2013

Stantec