

## Roxanne Maher

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**From:** Bruce Edwards <bruce@trvmedia.com>  
**Sent:** Wednesday, December 11, 2024 2:51 PM  
**To:** Anna Wynn  
**Cc:** Roxanne Maher  
**Subject:** GFI QUARRY - THAMES ESTUARY COMMENTARY -P&Z EXHIBIT SUBMISSION  
**Attachments:** 20241201 - CASHMAN GFI QUARRY COMMENTARY - MASTER.docx

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Good Afternoon Anna,

As discussed yesterday, 12/10/2024, I am submitting a commentary as an Exhibit to the Cashman/GFI Special Permit Application process. In my presentation tomorrow night, I expect to provide a brief overview of the commentary to the audience. As mentioned yesterday, I would like to play two very short videos and the links to those YouTube addresses are at the top of the first page of the commentary. I have also supplied the two links to the videos here. Please let me know if we might have any issues with that. I do not anticipate needing more than ten minutes for my presentation.

**Baldwin Blast Dust PSA:** <https://youtu.be/CYpqiYGXr5w>  
**Dust Truck:** <https://youtu.be/rbg0NEyOYRQ>

Thank you very much.

All the Best,  
Bruce G. Edwards  
30 Bluff Road West, Gales Ferry, CT 06335  
860.608.7374

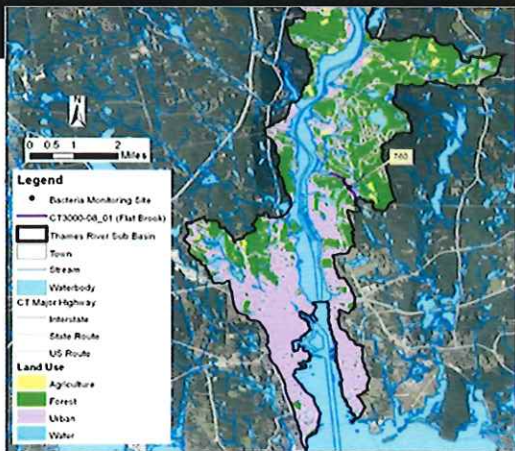
# THE THAMES RIVER ESTUARY VS A GFI QUARRY EXCAVATION

Video links:

Baldwin Blast Dust PSA: <https://youtu.be/CYpqiyGXr5w>

Dust Truck: <https://youtu.be/rbg0NEyOYRQ>

## PART I - FROM HISTORICAL TO UNSTUDIED



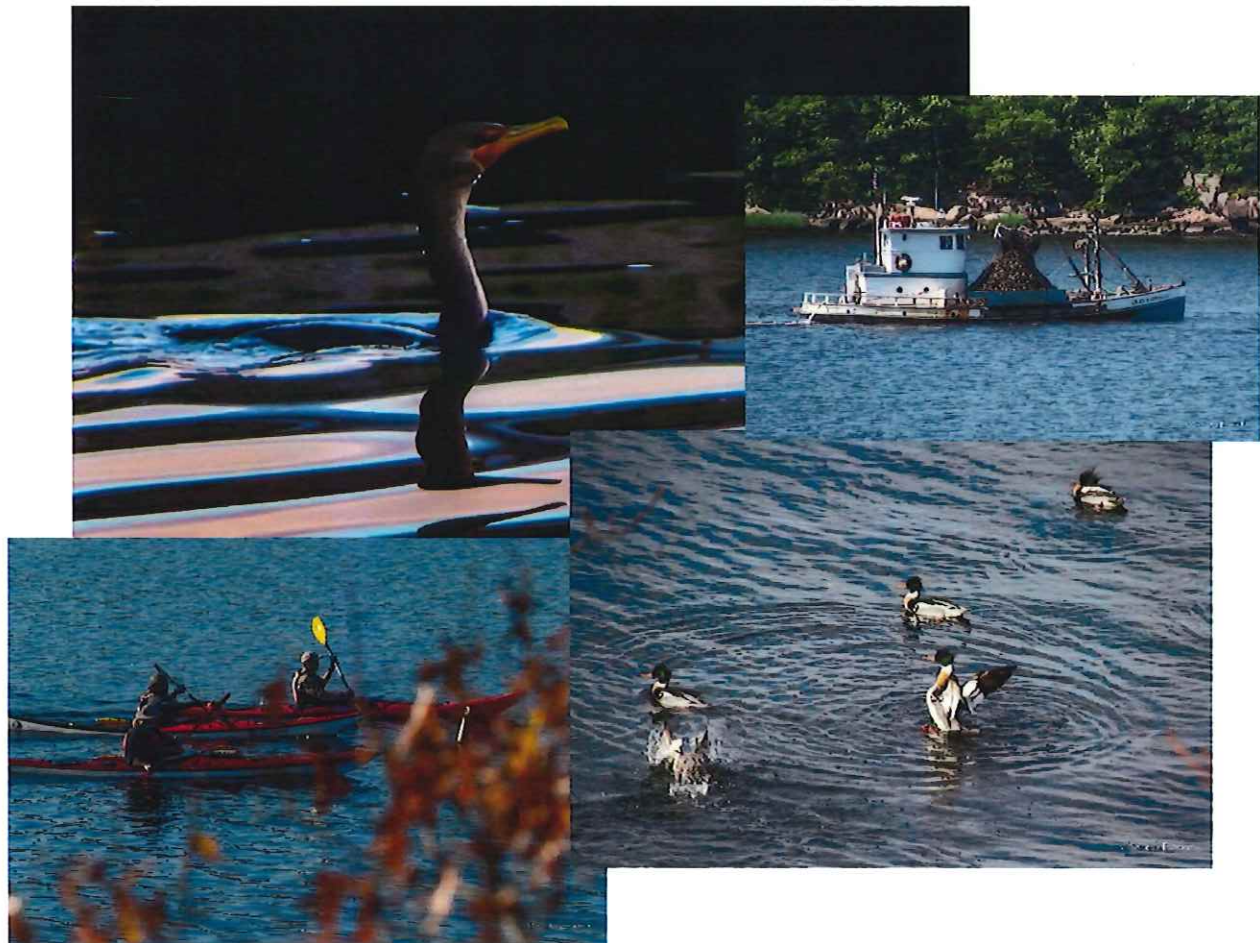
Thames River Sub-Regional Basin Land Use Map  
Created October 2011 MAP Data DEEP

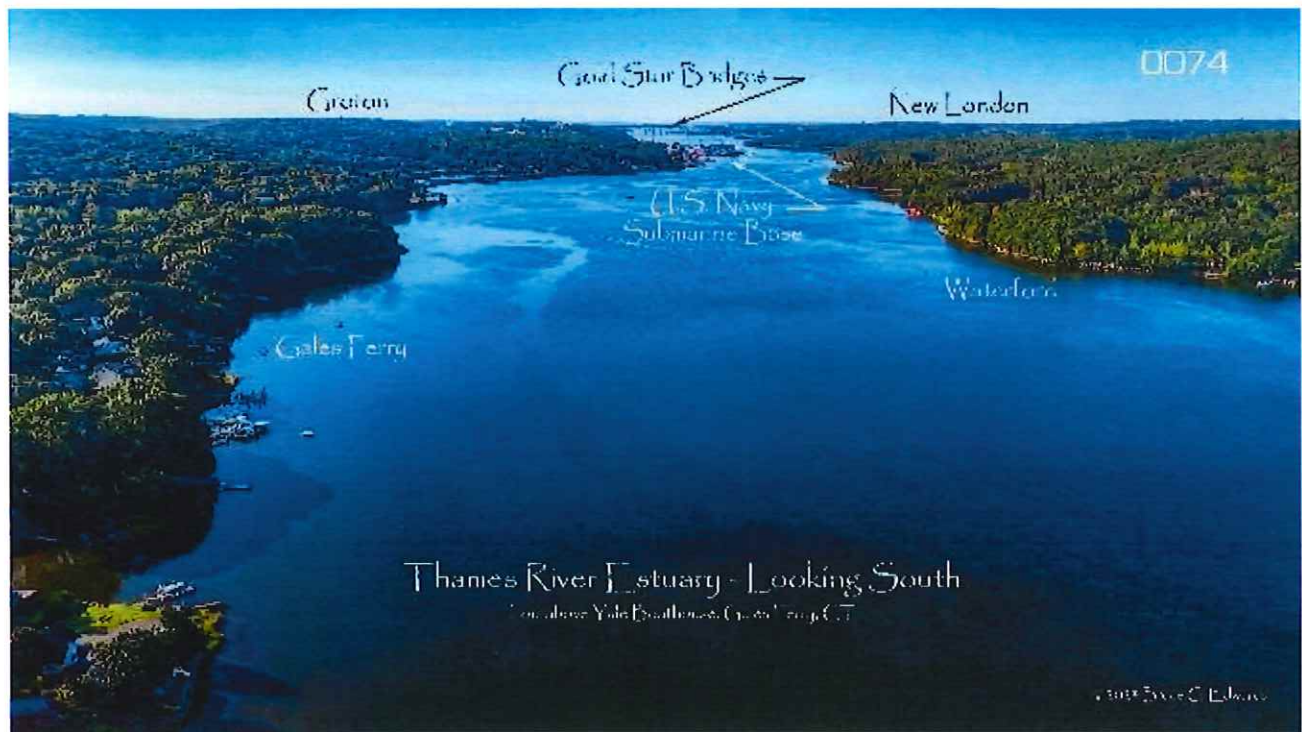
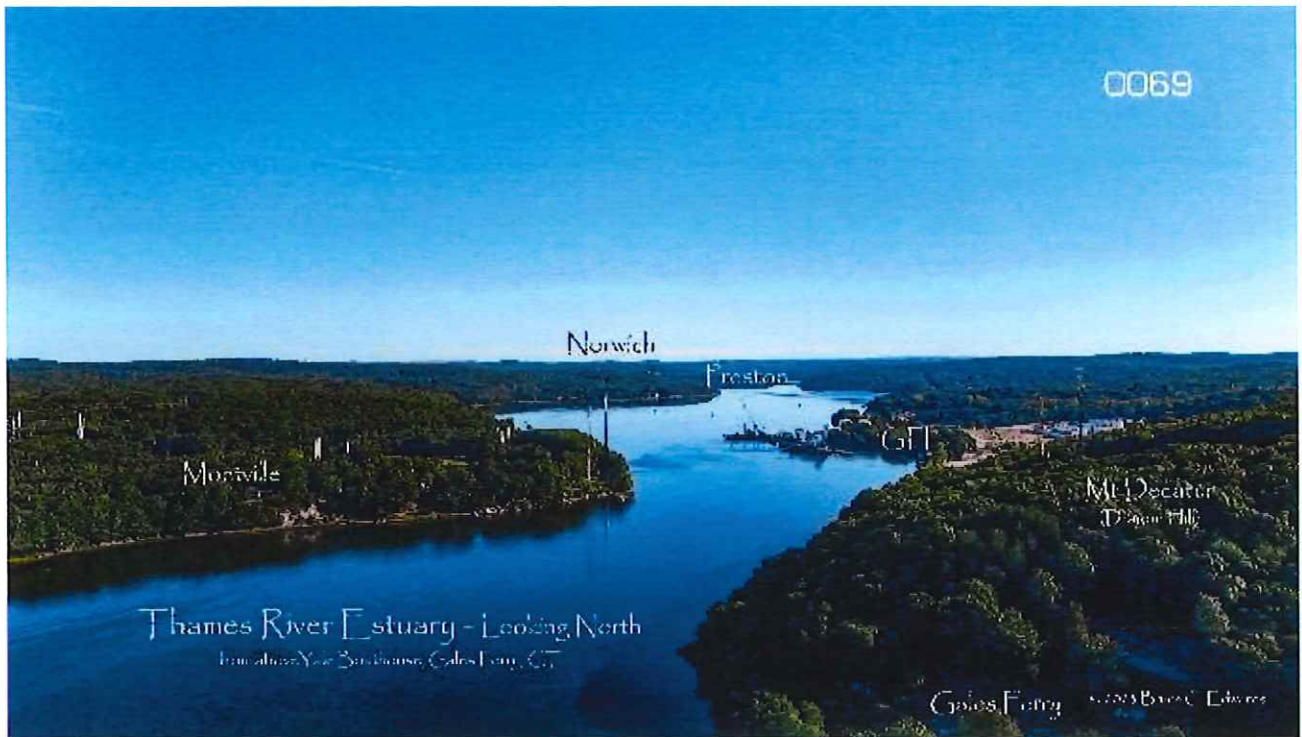
The Thames Valley Estuary is a vital, environmental watershed region, that was damaged and polluted significantly by dirty industry for well over a century. Aside from the glorious endeavors of the past, from submarines to penicillin, over time, we have educated ourselves about hazards not previously understood.

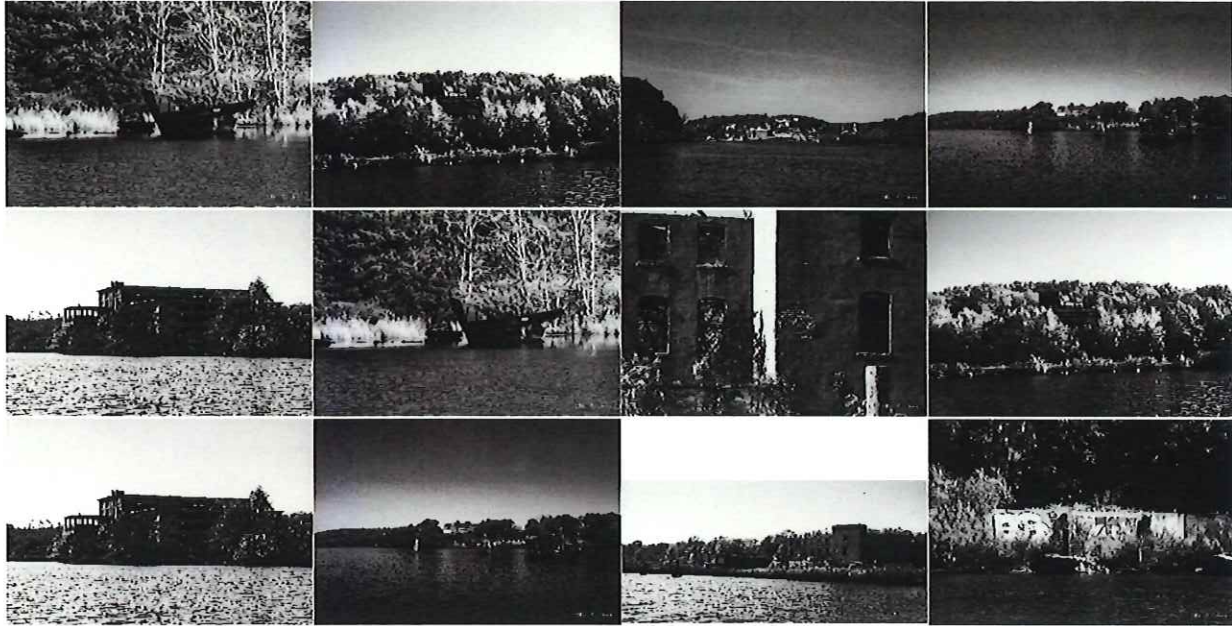


For more than 30 years, I have witnessed a slow and steady recovery to the Thames. This recovery is underscored by the return of Bald Eagles in the last 15 years, the flourishing of osprey, heron, fish and crab populations, the successful farming of river cleansing oysters, and even visits by the occasional bottlenose dolphins and seals. The long recovery of the Thames River from a state of terrible pollution to now, has been challenging, expensive and it is not over yet.

Still, the water is much clearer today, more suitable for Safety, habitat and even recreation

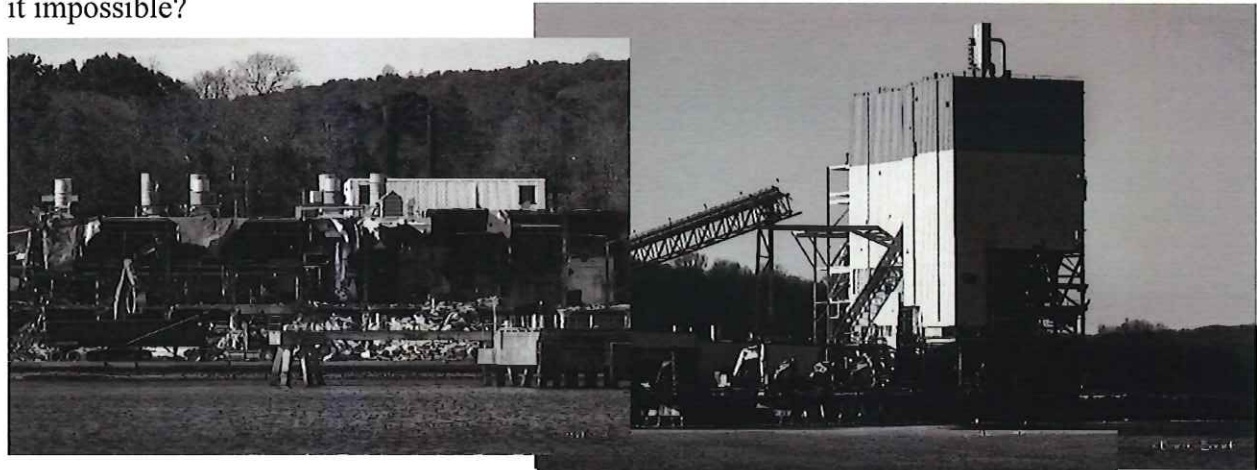






*Abandoned "Industry", including a scrap metal site that was contaminated, a vessel, and industrial level commercial and State facilities such as Norwich hospital, a known river polluter. Oil, fuel, chemical dumping and spills along with raw sewage, has produced quite a cocktail. Today, fertilizers, weed control, invasive species are known hazards that we also still face.*

Cashman/GFI will have you believe that Industry is good for the river and the region. They have made it clear that what used to be here then should blindly entitle them to be here now. GFI suggests a simplistic formula: "If it is "industrial," it should be allowed. Ironically, they have set up shop on the very contaminated grounds of a previous "Industry". Soil that is still identified by the EPA as so contaminated it must be capped and contained. Why did Dow not remove it? Was it impossible?



*Westrock Paper Mill  
AES Thames Power Plant  
Former Dow Chemical Manufacturing site  
A paper mill and a coal fired power plant  
shut down and demolished,  
along with much of Dow Chemical.*



## PART II – CONTAMINATION TRANSPORT VIA GROUND VIBRATION

In more than two years of Public Hearings related to GFI development applications, an extraordinary amount of legitimate, regulatory, scientific, legal, and testimonial Exhibits, that establish an abundance of clear reasons to deny the GFI special application for an excavation, in real terms, a quarry, have been put before the Ledyard Planning & Zoning Commission, and the residents of this fine Town. Some of this very vital information appears to have been summarily, and strategically, discarded when applications were withdrawn by GFI. It should be made clear that the attached Exhibits and Testimonies of the withdrawn applications, do not carry forward to the renewed applications and, therefore, no longer apply, unless resubmitted. My deepest sympathy goes to the commissioners.

The recital of the numerous past and current Exhibits is not necessary to be made by me here, as very many, much more skilled presenters, have already provided the information in good concise, credible form. Collectively, and at the request of the Commission, many of us have made efforts to consolidate and minimize redundant testimony. So much has been presented and still, remarkably, there does remain more unseen, unstudied, information that seriously conflicts with the GFI application for a quarry excavation and, in evaluation, should not be ignored. The bad vibrations of disaster are felt clearly.

For example, let's consider this: If you put gas and water into a jug and let it set, the two liquids separate. Water to the bottom, gas to the top, it is all still in the jug. Shake it really good and the gas and water will mix together into a cloudy solution, but for only a while. Left unmoved, eventually, it will separate again. However, in that period of time, the polluted solution, if poured onto a porous surface, can migrate easily through it. Also, after separation, the two liquids will still migrate. Regardless, the water side is untenably polluted.

Now, put dirt into one side of a tub and the gas & water solution into the other side of the tub. Cover the dirt with an impermeable membrane and vibrate the tub. Soon you have mud, mud that is contaminated with gasoline. The outcome is simple: the solution migrates with vibration, even if the dirt is covered on top. In fact, the dirt itself can migrate, settle, and also move in all kinds of ways. Just ask a gold miner panning for precious metals or a child shaking sand in a bucket to find a shell.

Many of you do not know that Gales Ferry is home to no less than two EPA designated Superfund sites: Dow Chemical/AmSty in the north and the Subbase in the south. We also have ground pollution to the east in Ledyard, that was a quiet gift from Pfizer Biopharmaceutical. If you search all of these sites on an EPA map, we live in a stew of questionable underground ingredients, and it all came from "friendly" industrial sources, bound to transparency but, apparently not immune to ignorance. Including willful ignorance.



*Not without its own controversy, the Quarry at Bozrah, CT, with blasting operations by Maine Blasting. Bozrah resident Lara Stauning filed complaints all of which, including physical home damage and quality of life dismemberment, were dismissed by MB with the reasoning that they complied with regulations. But how do we really know? Lara, shared her sad and unjust experiences to Ledyard P&Z as simply a warning. Will she sue Bozrah? Could Ledyard be sued for careless indifference? Also, Look at MB's fly rock issue that injured two in Westerly. Links below.*

My point is this, if blasting, rock crushing and heavy equipment movement doesn't move the earth, shake the ground, and migrate water, solid and liquid contaminants, then what does? Actually, we know it does, and industry relies on vibration to move material every day.

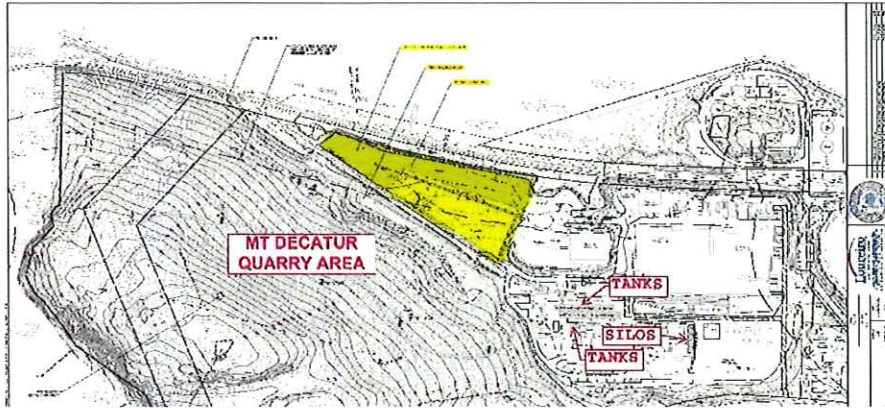


Industrial Sand/rock vibratory separator



Since the GFI excavation/quarry was first presented to the Townspeople of Gales Ferry & Ledyard, I have not seen one study presented on the vibratory effect on an existing, EPA designated, superfund contaminated site. In fact, it is difficult to just identify the contamination remediation zone on the property in either the narrative or the site plan work, and I could find no mention of monitoring or protective safety considerations by Cashman/GFI. What are they thinking of, or, are they not? Significant, and long duration vibration from proposed rock crushers, conveyors, and heavy equipment operations, located literally just feet above a water table and a capped field of contamination at GFI, are designated in their plan. Now, add in quarry blasting to open pathways and help propel things along. What solid/liquid contaminants in the ground will make their way up, down, all around, to the river or to drift along into the water table? Has GFI considered this or is it just too convenient to have a prebuilt space to crush rock? We should know before, not after.

Constant vibration and periodic blast shock waves can change underground geology and destabilize the strata below. Back on the surface, this perpetual earthquake can work destructively as well. Has anyone inspected the support structures for the 20 vertically standing, elevated, AmSty chemical tanks on site? How will these aged structures stand up to the seismic vibrations and rock blasting shock waves? What will a tank spill do? Will the watershed area here be shedding tears of permanent destruction from cancerous Benzene and other contaminates?



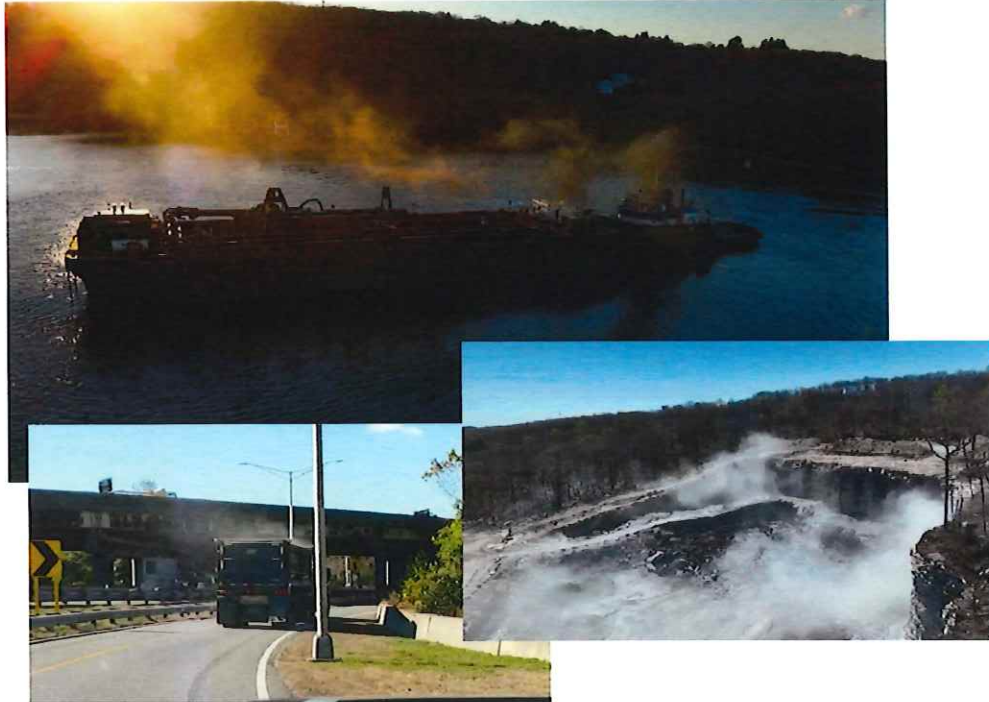
I hate to ask but, isn't the burden of GFI to clearly demonstrate the safety of the total GFI operational envelope? The GFI narrative, with all of the hundreds of pages of plan work and expert testimony, appears very short of meeting this burden. The window is fogged, not transparent. Is this a case of willful ignorance, just shaking the dirt in search of gold?



### **PART III – WATER CONSCIENCE**

Ledyard's boundary extends to the middle of the Thames River, meeting Waterford and Montville. Though Ledyard does not command this designated Federal Waterway, does Ledyard not have a voice or concern in the possible disruption or damage to a Ledyard permitted Oyster Farm from a grounded Cashman tug with barge that, in an effort to drive through the shallows outside the channel to free itself, was turning up and propelling considerable bottom material towards the channel and nearby Oyster Beds? Was the navigation channel altered? That may be for the USCG and ACOE to monitor, but who has checked the river bottom and the oyster beds?





1. *Grounded Cashman tug with empty hopper/dredge barge, apparently attempting to drive through the shallows to get back into the channel by cycling thrust up/down and forward reverse. No bow wake indicates it was not going anywhere. It was however, turning up and propelling the bottom material considerably.*
2. *Trailer dump that exited Long Cove Road in Gales Ferry, gaining speed as it heads towards Gold Star Bridge, increasing its dust cloud trail.*
3. *Maine Blasting P&Z Public Hearing 092624 demonstration video of Blasting at Baldwin Hills Quarry, Gales Ferry.*  
*Note: All images are also available in original video form.*

The quarry is not even active and 2 additional barge/tug groundings have also been mentioned to me. 3 grounding incidents plus a fuel spill at Gateway, all in 1 year. That sounds like Industrial level treatment to me. If we cannot even speak up or question the basics, how will we understand, how will we enforce regulations, like the trucks on our roads and the dust in the air?

#### **PART IV – ABOUT GOOD NEIGHBORS & EXPERTS**

Cashman/GFI could, and should be, a good and welcomed business in this Town. We are actually an extremely friendly, caring community. But they, evidently, are not. They are clearly trying to deceive us all because even though they know what is correct and safe, correct and safe appears to not fit into their agenda. The track record is there to review, in all of the applications strategically withdrawn and this active application as well. GFI supplied critical response information, is often vague, elusive, mis-stated, or even wrongfully interpreted when confronted with accurate, credible, opposition. Cashman is proposing unacceptable harm to this community. Their claim of transparency is a long-lost leader. They are also doing a disservice to their dredging company reputation. They, by the way, are not quarrymen. The GFI investment is their business risk, not ours. Cashman/GFI has funded numerous experts in promoting both the previous review of applications for Solid Waste Processing of Contaminated Dredge Spoils, as

well as the three Quarry excavation special permit applications put forth. It is amazing to me that their application is on the third adjustment because, apparently, their experts did not get it right on the first two tries. What must be an enormous financial investment to fund so many “Expert” witnesses’ testimonies, that presented so many dubious one-sided conclusions and interpretations of conditions and regulations, as well as outright dismissal of the obvious, is just mind boggling. Do they really think this is a simple problem worthy of a thoughtless NIMBY insult to the residents Gales Ferry & Ledyard? Does GFI actually believe that delivering hours upon hours of brain numbing, tasteless word salads, actually improved their position? Their expectation of listener fatigue proved somewhat true, but it has not altered the residents unified resolve and promise to protect health, safety, the environment, historic land, and a quality of life that so many work and live for here.

About the expert, incredulous, financial incentives GFI offered: Why is this even part of the application at Planning and Zoning? Their expert testified that that a \$58,468 annual pay for an employee would allow for 75% discretionary spending in “the Norwich-New London Region”, where a small apartment easily fetches \$24 – 30,000 or more annually, which is also about twice the non-discretionary 25% allowance. Tell me please, I’m an old guy. Is this new math or Harry Potter magic?

Next, a GFI expert projection of a one million-dollar plus tax revenue blast for a single tax year, beginning 12 or 13 years from now, generated from imaginary commercial development, after GFI sells out a Historic Mountain for many millions of dollars in profits was a real eye opener. Add to all of that absurdity, an offer of \$0.25 per loosely estimated cubic yard of stone aggregate, in lieu of Ledyard taxes, an amount that suddenly seemed to drop from an estimated 6-7,000,000 cubic yards total, to somewhere around 4,000,000 cubic yards. Ironically, it all becomes transparent now. Cashman/GFI profit above all. Profit on the backs and lungs of Gales Ferry & Ledyard. It just takes your breath away.

## **PART V – IT IS ALL SO QUESTIONABLE**

Questions beget questions so, I need to ask: Will all of this imaginary town revenue be enough to pay the costs of monitoring, enforcement, legal, emergency, and other services that will be required to support the actual reality of a quarry? It seems that Ledyard cannot even cover and control the small, grandfathered quarry at Baldwin Hill right now. Or is that an just an excavation? It is good that Baldwin should be short lived. But when does this dustup torture stop? Supposedly, a decision this month, but one never really seems to know.

Keep this in mind: The GFI special permit application to “Excavate,” which is a GFI pseudonym for “quarry,” is to provide space for imaginary commercial buildings that will maybe appear 7 – 10 years from now if there is an occupancy market for them at that time and, if GFI is still here after quarry aggregate profits have left. Yet in that same application, GFI seems to be preserving clear concrete pads that were previously designated as processing pile areas for Contaminated Dredge Spoils. Their current proposal shows these pads as aggregate stockpile areas.

One has to wonder. After the quarry there is no aggregate. Would these pads not be good for a building investment now? GFI could forgo the quarry, save expert fees, build imaginary buildings now, with luscious water views, pay us our million in a year and leave us safe, comfortable and happy with many more jobs, but without all the dust, noise & truck traffic? What is wrong with that? A mystery question for sure.

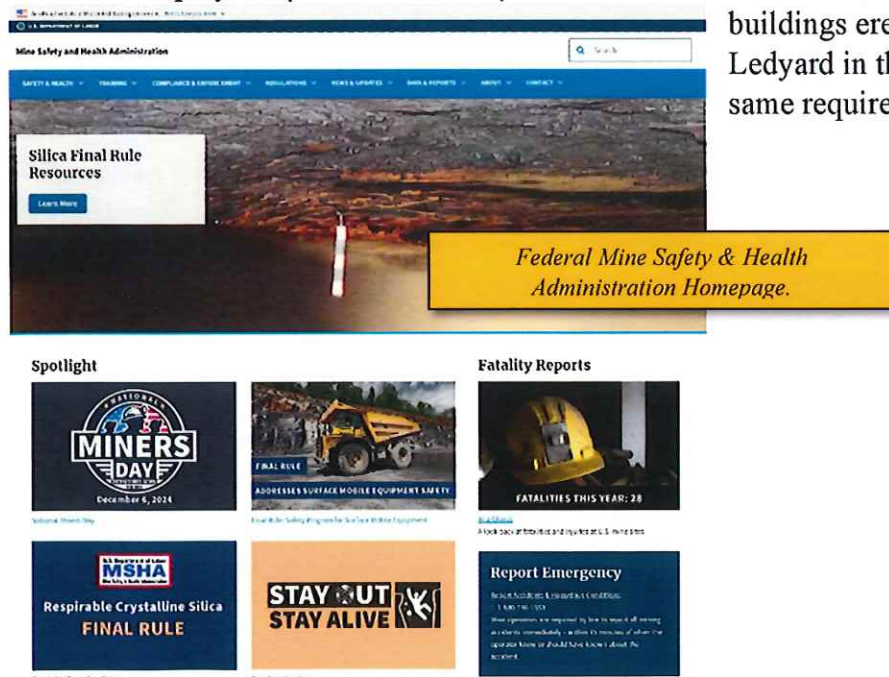
But wait. What is the probability that a Solid Waste Treatment Facility for Contaminated Dredge Spoils will be brought back before the P&Z in a new application? If the quarry were somehow operational then, would there be room for all the quarry aggregate plus Contaminated Solid Waste on site, but not a couple of new buildings on roughly a 100 acres of existing flatland minus the old AmSty plant? This is also just so readable.

Ask yourself this: If Solid Waste Contaminated Dredge Spoil Processing were approved on the first, very quiet application submitted by GFI, would it have opened a door wide enough for the quarry to slip through? I suggest you think of it in reverse as well. Kind of a drop back and punt strategy by GFI. I personally believe that both operations were in design at the outset of GFI's endeavors for Allyn's Point, but that does not really matter. What matters is for well over two years many of our residents have toiled and committed countless hours of research, significant expense of time and money to present legal, credible, responsible evidence opposing both series of applications. The resident effort is unpaid, costly, and will not reap profit. The motive is basic and multifaceted: protect health, safety, an American Historic Mountain and the environment of the Thames River Estuary and Watershed area. This is not greedy. It is common sense that flies in the face of reckless and dangerous industrial development.

Another question: In recent testimony before the P&Z Commission, GFI, via Loureiro Engineering as I recall, noted the strict Federal requirements and monitoring that will be imposed on them for this "excavation" project by the Mine Safety and Health Administration, "MSHA".

How many Town of decade had the MSHA?

buildings erected in the Ledyard in the last same requirement from



## PART VI – JUST BREATHE

Let's start with this. Go to and just look at the MSHA.com home page and then follow the Silicosis leads from there. Why would workers need so much protective gear but not the neighbors, or even AmSty employees that are actually on site?

The info trail is long and broad. Check the silicosis parallel to asbestosis. I once filmed a deathbed testimony about asbestos that the worker was misinformed about the dangers, by a large company with a great reputation, a very profitable company. His wife was also exposed by virtue of handling his work clothes to launder. He died the very next day, and she was left alone, trying to fight for coverage of massive medical bills. It was heartbreaking. Crystalline silica is possibly worse. Isn't it ironic that the reveal of Silicosis symptoms is typically 10 – 20 years and the applicants quarry excavation is projected for up to 10 years?

Before this GFI Public Hearing marathon started, I knew nothing about the existence of silicosis. I do not take claims like this lightly. It was not difficult to do the homework and verify. Go to American Lung Association as one of many avenues. The effects of silica dust pertaining to off-site exposure is shamefully not well studied in the U.S. but is for Asia and South America. But then, how many U.S granite quarries operate right in such close proximity to residents? It seems to be rare, but then look at surface mining for coal. Not the same, but similar dust transports.

About runoff. Just make a few little catch ponds and you got it controlled. But that is not completely how it will all work. Runoff containing contaminated dust will find it's way into the Thames and watershed areas. It is clearly going to happen, and it's harm will affect more than just people.

Recent estimates of 7,000, up to 50,000 gallons a day pumped from the river for dust mitigation control, light's up a bunch of those pesky questions like: where the hell is it all going to go? Into those Harry Potter Goldfish ponds? Would that also not displace and disrupt more than water?

Dust, if not sent into the Thames, will dry, accumulate, get spread about the site and get stirred up and airborne again and again, by equipment, vehicle operation, rain, snow and wind. The breeze is so good on the Thames that we do not have air conditioners in our home. So, how much silica laced dust would you like to breathe or consume today? Even simple dust can be harmful at the levels GFI is expected to generate. Witness exhibits for neighbors of smaller quarries demonstrate that clearly. It does not just go away as GFI would like you to believe.

Water spray is only a light mitigant to dust generation. Covered conveyors are typically open on the sides to allow airflow which allows dust to be ejected. Just like the truck covers do. They are not true dust containment devices as GFI would like you to believe. To that end, they would require total hermetic sealing with air filtration. I doubt the all protective dome is in their budget. GFI's Granite Quarry as planned for, does not have a viable, active, containment process in place and Cashman/GFI has unwittingly made that abundantly clear. So put a quarry in the middle of a residential area? REALLY?

Willful ignorance is wrong. People should learn from mistakes, not propel them into the lungs of innocent children, residents and the regions environment. Children are not to be our test cases in the name of profit. Johnson & Johnson did that with Talcum. Asbestos is another poison that did not get curtailed soon enough. Silicosis is a known serious health threat. We need to reasonably give it an extremely wide berth. This is not unnecessary reactionary; it is responsible determination.

## **PART VII – FINDING THE UNFOUNDED FEAR**

Does GFI actually believe that our residents object to the quarry application based on “unfounded fear”? I must state my feelings plainly: That was a stupid and shameful statement for Attorney Heller to make. To be clear, we actually do fear, but it is not unfounded. We have done our homework and logically fear losing our health, safety and well-being if the quarry special permit gets passed. We are afraid of losing the Town we know and love so much. GFI has not even come close to proving the safety and compatibility with our community, as required in Town Regulations. In my opinion, using the term “Excavation” vs “Quarry” as an anchor to GFI’s argument to bypass serious regulations is wrongful. It is a trick that failed to trick.

Further, and practically speaking, if the GFI quarry is now allowed to happen in Gales Ferry, it could probably happen anywhere in Ledyard based on precedent and applied zone changes. Regardless, the Town residents are not afraid to oppose Cashman/GFI, not afraid at all, and that is because we know and respect what is correct going forward, not backward. Another question we should all ask: When has any application in the planning history of Ledyard, ever met with so much resident opposition with so much testimony, for nearly 2 years, ever happened? Why is that? I suggest that it is because this is our castle, built with hard work, dedication, and rightfully, we will defend it.

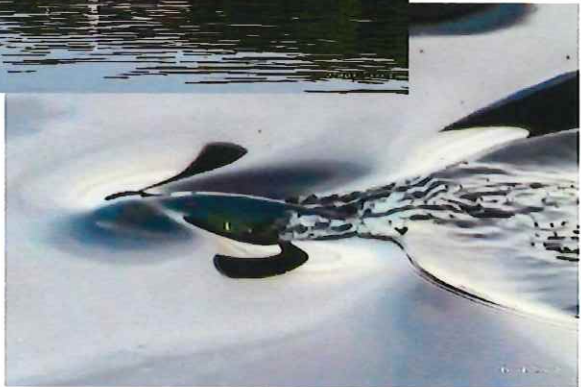
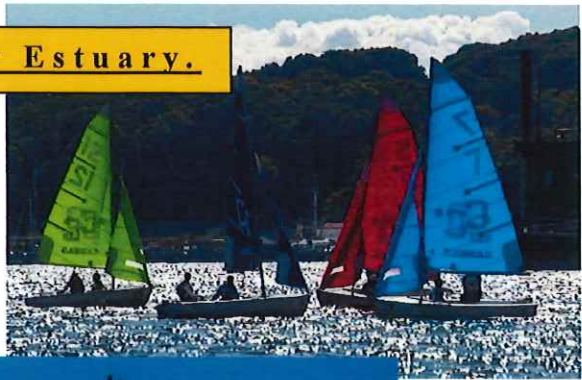
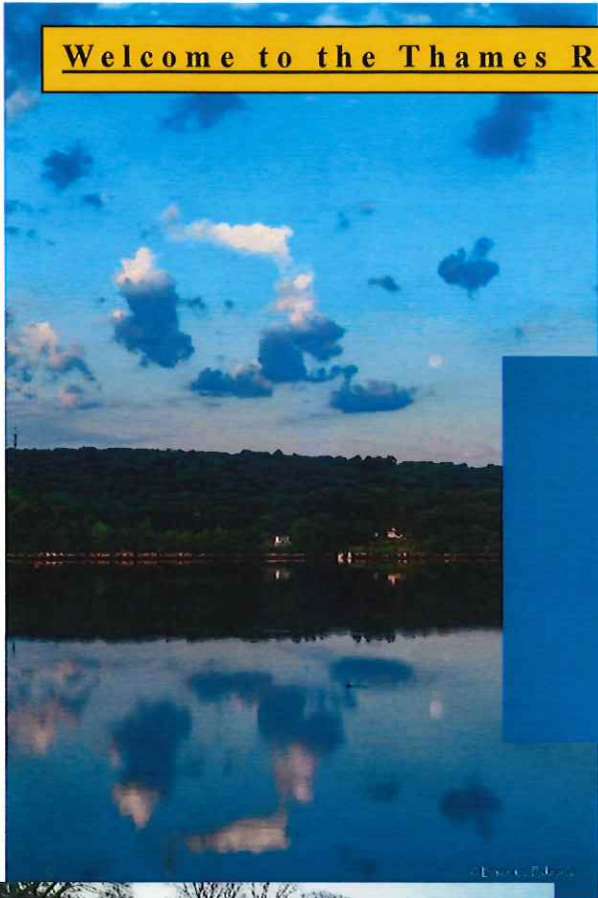


## **PART VIII – TIME TO GO**

Cashman can have a quarry, or contaminated dredge spoils treatment, in the right place with the correct processes, in accordance with regulations, but not at GFI. The correct message to Cashman is that permissible conditions for a quarry excavation just do not exist in Gales Ferry & Ledyard. Take a realistic look around. This needs to end now.

Sincerely,  
Bruce Edwards, 30 Bluff Road West, Gales Ferry.

Welcome to the Thames River Estuary.





20241201 – CASHMAN QUARRY COMMENTARY EXHIBIT for 120524 P&Z PUBLIC HEARING



***The Thames Estuary is an important vital resource for many reasons including health.  
It is historically significant to Native Americans, to all Americans.  
It is better today than it was yesterday.  
We are the stewards of this watershed region and have an obligation to care for and preserve.***



## REFERENCE LINKS

The attached reference EPA Superfund and UDEL links, illustrate and address the past dangerous discrepancies of “Industry on the Thames.”

EPA - Dow/AmSty Superfund:

<https://www.epa.gov/hwcorrectiveactioncleanups/epa-rcra-id-ctd001159730>

EPA - Addressing Groundwater Contamination:

<https://www.epa.gov/superfund/how-superfund-addresses-groundwater-contamination>

EPA – Abandoned Mine Lands:

<https://www.epa.gov/superfund/abandoned-mine-lands>

EPA – U.S. Navy Subbase New London (Groton) Superfund:

<https://cumulis.epa.gov/supercpad/SiteProfiles/index.cfm?fuseaction=second.Cleanup&id=0100261#bkground>

UDEL – SWIFT REPORT (Sustainable Watershed Initiative For Thames River - April 3, 2024)  
University of Delaware River Studies

<https://www.wrc.udel.edu/wp-content/uploads/2024/07/SWIFT-Report.pdf>

Westerly Sun - Questions remain as Westerly Town Council to hear update on quarry

[https://www.thewesterlysun.com/news/questions-remain-as-westerly-town-council-to-hear-update-on-quarry/article\\_84f722d4-423a-5c77-a1e1-1d57a029d73f.html](https://www.thewesterlysun.com/news/questions-remain-as-westerly-town-council-to-hear-update-on-quarry/article_84f722d4-423a-5c77-a1e1-1d57a029d73f.html)

10 WJAR – Company cited for Westerly quarry blast that injured two

<https://turnto10.com/news/local/company-cited-for-westerly-quarry-blast-that-injured-two>

ecoRI News - Quarry Dust Covers Westerly in Concern

<https://ecori.org/2017-4-15-quarry-dust-coats-westerly-in-concern/#:~:text=A%20site%20inspection%20by%20the,agreement%20that%20addressed%20water%20pollution.>