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August 28, 2023  
Project Number: 05.0045441.12

Mr. Brian Drake  
RCRA Corrective Action & TSCA Section  
U.S. Environmental Protection Agency, Region 1  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109

Re: Response to Comments  
Former Daniel's Mill  
98 East Main Street  
Vernon, Connecticut

Dear Mr. Drake:

On behalf of the Town of Vernon, GZA GeoEnvironmental, Inc. (GZA) has prepared this letter in response to the comments received from the Environmental Protection Agency (EPA) regarding the January 2023 *Notification of Self-Implementing Cleanup* (the Notification) for the former Daniel's Mill property located at 98 East Main Street in Vernon, Connecticut (herein referred to as the Site). These comments were included in a June 22, 2023 electronic transmission from you. For your convenience, the General and Specific comments followed by our responses (in italics) are provided below.

## BACKGROUND

The Site is currently owned by the Town of Vernon and is an integral part of a larger proposed mixed residential and commercial development that includes the former Amerbelle Textile Mill (which is also owned by the Town of Vernon) located to the east of the Site and the former Anocoil Mill located to the south/southwest of the Site, which is owned by the developer. The specific development plan for the Site is to renovate the building, including the basement, for residential purposes. The remediation of the Site and abatement of the hazardous building materials is being partially funded with a Brownfield grant from the Connecticut Department of Economic and Community Development (CTDECD) and an additional Brownfield grant received from the EPA.

## RESPONSES

### General Comments:

1. Please provide a figure showing the proposed verification sampling locations for the Site.

*Response: As described in the Notification, we acknowledge that characterization of the PCB impacts to the east and west of the building and within the basement area was not completed consistent with Subpart N primarily due to the presence of utilities and obstructions (in exterior areas), the thickness of the concrete floor in the basement, and the amount of material stored within the basement. The Conceptual Site Model (CSM) for the identified PCB impacts are surface releases and, consistent with this CSM, the highest PCB concentrations were generally observed in shallower soils and decreased with depth*



*with the exception of the release to the west of the building. The potential source of the identified PCB impacts within the area to the west of the building is a release of PCB containing materials that were formerly managed at the adjacent loading dock to the ground surface and the highest concentrations would be anticipated to be located within and directly below the asphalt pavement. However, in certain locations, slightly higher PCB concentrations were observed approximately 10 to 39-inches below ground surface. The vertical extent of PCB concentrations greater than 1 mg/kg did not appear to extend beyond 24 to 36 inches below grade in the northern and central portions of this area or 48 inches below grade in the southern portion of this area. Given this discrepancy in the CSM in this area, it is possible that fill was imported to backfill this area after the historic removal of the southwestern portion of the loading dock and the underlying underground storage tanks and the entire area will be conservatively excavated to 4-feet below grade.*

*Figures depicting the approximate locations of the proposed verification sampling points within the soil excavation areas to the east and west of the Site building and beneath the basement floor of the Site building and within the concrete floor removal areas within the basement are attached for reference. While actual sampling locations may vary depending on conditions encountered during the performance of the work, it is our intent to collect verification concrete and soil samples on a 1.5-meter grid pattern consistent with the requirements of Subpart O. As described in the Notification, up to 4 adjacent samples will be composited and analyzed for PCBs using Method 3546 (Microwave Extraction)<sup>1</sup> and Method 8082. If the results of the composited sample are equal to or above 0.25 mg/kg (1/4 of the remedial target of 1 mg/kg), then the individual samples comprising the composite will be analyzed to determine where additional removal is required. Additional remediation will be performed until all individual verification sample results meet the established remedial goal of less than or equal to 1 mg/kg or the results of composite samples are below the remedial goal divided by the number of samples (e.g., the target residual concentration for a composite sample consisting of 2 individual samples will be 0.5 mg/kg [1 mg/kg divided by 2 individual samples]).*

2. As the community in which Daniel's Mill sits is a community with Environmental Justice (EJ) concerns, EPA requests information regarding what type(s) of outreach to the community is being conducted.

*Response: The Town of Vernon has been working collaboratively with the community on the redevelopment of the Site and the adjacent mill complex for years. Community stakeholders have been part of the discussions with Town officials and state agencies with respect to the present condition and future reuse of the Site. Key stakeholders that have been involved in the decision-making process and form the Brownfields Steering Committee (BSC) for the Site include representatives from the following: the Rockville Downtown Association and Opportunity Works (a non-profit, community based organization), the Rockville Community Alliance (a community based organization), the Tolland County Chamber of Commerce (regional business liaison), Vernon's Volunteer Collaborative (coalition of volunteer groups), Vernon Community Network (volunteer community agency), and Vernon Mill Owner, LLC (the developer).*

*Community outreach activities have included stakeholder meetings held in the Town Hall and open to the public, informational materials on the project that are posted on the Town's website, public meetings and surveys to solicit feedback from the community on the development plan, public meetings to present the Site cleanup alternatives evaluated, and notification of the availability of the remedial action plan for the Site for review by the public.*

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<sup>1</sup> Note the Notification indicated that verification samples would be analyzed for PCBs via Method 3540C (Soxhlet Extraction) and Method 8082. However, we now propose to use Method 3546 (Microwave Extraction) instead of Soxhlet Extraction.



*The Town is also in the process of finalizing a Site-Specific Community Relations Plan for submittal and review by EPA.*

#### **Specific Comments:**

1. Section 3.2, pdf p7. Paragraph 2. It is stated that detected PCB impacts above 1 ppm are bounded laterally to the north and the west of AOC-3. It does not appear to EPA that sufficient sampling has been conducted to establish the northern and western boundaries of AOC-3. Specifically, two of the three samples (B-21 and B-24) were taken over an interval of 0.5- 2 fbg. Sampling over too large an interval can result in dilution, and therefore inaccurate characterization. The third sample, B-58, was taken at 10-13 inches (in). A sample at this very discreet depth may or may not accurately characterize the boundary of AOC-3, as PCBs > 1 ppm have been found in AOC-3 at several depths other than 10-13 in (e.g., 12-15 in, 21-24 in, 30-33 in, 36-39 in, etc.). Please provide additional discussion regarding the adequacy of sampling relative to AOC-3's boundaries, including any plans for future sampling.

*Response: Verification sampling will be completed consistent with a Subpart O grid and, since this grid is more robust than the Subpart N sampling grid, we are confident residual PCB soil concentrations in this area will be less than or equal to 1 mg/kg upon completion of the remedial excavation.*

*With respect to the vertical delineation, PCBs at concentrations above 1 mg/kg were observed in soil at depths up to 36 to 39 inches below ground surface (bgs) in one boring (B-22A) in the southern portion of this AOC and appeared to be limited to depths less than 24 and 33 inches bgs at borings (B-35A and B-23B) in the central and northern portions of this AOC. However, the entire area will be conservatively excavated to 4 feet below grade. Upon excavating to 4 feet below grade, verification soil samples will be collected from the base of the excavation on a grid pattern consistent with Subpart O to demonstrate concentrations are less than or equal to 1 mg/kg. Verification soil sampling locations from the base of the excavation are depicted on Figure 4.*

*With respect to the horizontal delineation:*

- *In the northern portion of this AOC, PCBs were only detected above 1 mg/kg in one sample (B-35, 10.5-13.5"). Verification samples will be collected from the sidewalls of the northern portion of the excavation consistent with Subpart O requirements from a depth of 10.5 to 13.5 inches bgs to demonstrate concentrations are less than or equal to 1 mg/kg. Verification soil sampling locations from the sidewalls of the northern portion of the excavation are depicted on Figure 4.*
- *In the central portion of this AOC, PCBs appear to be present above 1 mg/kg in the 6 to 24-inch depth interval. Given this distribution, the verification samples in the central portion of the excavation will be collected consistent with Subpart O requirements and the 12 to 15-inch and 21 to 24-inch interval from each location will be submitted for analytical testing to demonstrate concentrations are less than or equal to 1 mg/kg. Verification soil sampling locations from the sidewalls of the central portion of the excavation are depicted on Figure 4.*
- *In the southern portion of this AOC, PCBs appear to be present above 1 mg/kg from 0.5 to 39 inches below grade. Given this distribution, the verification samples in the southern portion of the excavation will be collected consistent with Subpart O requirements and the 9 to 12-inch, 21 to 24-inch, and 33 to 36-inch intervals from each location submitted for analytical testing to demonstrate concentrations are less than or equal to 1 mg/kg. Verification soil sampling locations from the sidewalls of the southern portion of the excavation are depicted on Figure 4.*



2. Section 3.2, p7. Paragraph 3. It appears that the easternmost portion of the building foundation wall is potentially in contact with soils containing PCBs > 1 ppm in AOC-6. Please clarify whether this wall has been or will be sampled to ensure the cleanup goal of PCBs ≤ 1 ppm has been met.

*Response: The eastern foundation wall of the building adjacent to Area of Concern-6 (AOC-6) has not been previously sampled for the presence of PCBs.*

*Upon excavation of the soil within AOC-6, concrete samples will be collected from the upper 0.5-inch of the exposed concrete foundation wall at a frequency of one sample every 10 linear feet. If the PCB concentrations are greater than 1 mg/kg, the concrete surface will be remediated.*

3. Section 3.2, p7. Paragraph 3. It is stated that AOC-6 (east of the building) is bounded to the south by sample B-37A. It is unclear to EPA that this sample adequately defines the southern boundary of this area. Specifically, sample B-37A was taken between 1.5 to 1.75 fbg, and PCBs > 1 ppm have been found deeper than 1.75 fbg throughout the rest of AOC-6 (e.g., at 1.75-2 fbg, 2.75-3 fbg, 4-4.25 fbg, etc.). Please provide additional discussion regarding the adequacy of sampling to determine the southern boundary of AOC-6 east of the building.

*Response: Verification sampling will be completed consistent with a Subpart O grid and, since this grid is more robust than the Subpart N sampling grid, we are confident residual PCB soil concentrations in this area will be less than or equal to 1 mg/kg upon completion of the remedial excavation.*

*With respect to the 5-foot-deep excavation area:*

- PCBs at concentrations above 1 mg/kg were observed in soil at depths up to 2 feet bgs at boring B-27 and up to 4.25 feet bgs at boring B-36A. However, this entire portion of the excavation will be conservatively excavated to 5 feet below grade. Upon excavating to 5 feet below grade, verification samples will be collected from the base of the excavation on a grid pattern consistent with Subpart O to demonstrate concentrations are less than or equal to 1 mg/kg. Verification soil sampling locations from the base of the excavation are depicted on Figure 5.*
- With respect to the horizontal delineation, PCBs were detected in soils from ground surface to 4.25 feet bgs at concentrations above 1 mg/kg. Given this distribution, verification sidewall samples will be collected consistent with Subpart O requirements and the 0 to 0.25-inch, 21 to 24-inch, and 45 to 48-inch intervals from each sidewall sample location will be submitted for analytical testing to demonstrate concentrations are less than or equal to 1 mg/kg. Verification sidewall sampling locations from the 5-foot-deep excavation area are shown on Figure 5. We note that the west and northwestern limits of this portion of the excavation will extend to the building foundation wall and verification sidewall soil samples will not be collected from these areas.*

*With respect to the 7-foot-deep excavation area:*

- In the northern portion of this AOC, PCBs were detected in soil above 1 mg/kg at depths up to 5 feet bgs (MW-2, 3-5'). However, this entire portion of the excavation will be conservatively excavated to 7 feet below grade. Upon excavating to 7-feet below grade, verification samples will be collected from the base of the excavation on a grid pattern consistent with Subpart O to demonstrate concentrations are less than or equal to 1 mg/kg. Verification soil sampling locations from the base of the excavation are depicted on Figure 5.*



- *With respect to the horizontal delineation, PCBs were detected in soils from ground surface to 5 feet bgs at concentrations above 1 mg/kg. Given this distribution, verification sidewall samples will be collected consistent with Subpart O requirements from the following intervals:*
  - *0 to 0.25-inches, 21 to 24-inches, 45 to 48-inches, and 60-63-inches on the east side of the excavation;*
  - *60-63-inches on the south and west sides of the excavation along the interface with the 5-foot-deep excavation; and,*
  - *Verification soil samples will not be collected from the north side of the excavation since the excavation extends to the foundation wall of the building on this side.*

*Verification sidewall sampling locations from the 5-foot-deep excavation area are shown on Figure 5.*

4. Section 4.0, p9. Paragraph 1. It is stated that "...the horizontal and vertical extent of PCBs have been delineated and the areas requiring remediation defined." It does not appear to EPA that sufficient soil sampling has been conducted to justify the proposed segregation of soils and remediation areas (designated in green on Figure 6). Specifically, there are several areas throughout the basement that have been segregated without any accompanying samples. Please provide additional justification regarding the adequacy of the sampling regime to support the proposed segregation. Additionally, it does not appear that sufficient soil sampling has been completed to vertically characterize basement soils. EPA understands that the proposed excavation in the basement is to 2 fbg, but it appears that vertical delineation is not adequate, a confirmation sampling plan in accordance with Subpart O would be required to ensure the cleanup goal of  $\leq 1$  ppm has been met. (This comment also applies to the comment for Section 5.0, p10, Basement Cleanup Plan)

*Response: The source of the PCB impacts within the basement appears to be related to releases from former manufacturing activities performed within the basement and the highest PCB concentrations would be expected to be observed within the concrete and the soil sampling interval directly below the floor slab in those areas where the release penetrated the floor slab. PCB concentrations in soil and concrete above 50 mg/kg were only detected in 1 concrete (PCB-1-B11-32) and 1 sub-slab soil sample (B-11) within the basement of the building. Both of these samples are located directly adjacent to the elevator shaft suggesting the source of these PCB impacts could be spills/releases of materials transported in and out of the basement from the elevator. However, since the sampling within the basement was not performed on a Subpart N grid, the concrete and soil generated from the remedial activities within the basement will not be segregated and will be disposed of at a chemical waste landfill or Subtitle C landfill permitted to take PCB remediation waste at a concentration greater than 50 mg/kg. We note this is a change from the approach presented in the Notification.*

*Furthermore, since characterization of the PCB soil impacts within the basement was not completed consistent with Subpart N, verification soil sampling from the base and sidewalls of the excavation will be completed consistent with a Subpart O grid. Verification soil sampling locations are depicted on Figure 6.*

5. Section 5.0, p10. Basement Cleanup Plan. It is unclear to EPA where concrete is proposed to be removed and where it is proposed to be scarified. The legend on Figure 6 designates the pink area as "concrete remediation to  $< 1$  ppm"; however, it is EPA's understanding that all concrete within the basement will be remediated to  $\leq 1$  ppm. Please clarify Figure 6 to clearly show where the concrete is to be scarified and where it is to be removed. There appears to be inadequate sampling to define the extent of contamination in the concrete. For purposes of scarification, it is strongly recommended that the extent of contamination is known prior to setting scarification depth. Please provide additional discussion regarding the adequacy of the concrete sampling regime, and/or provide plans for future sampling.





*Response: In the red (or pink) areas depicted on Figure 6, the concrete floor will be removed in its entirety. Outside of the red areas, the concrete will be scarified. The initial scarification depth will be 1-inch. If after removal of this upper inch of concrete PCB concentrations still exceed 1 mg/kg, an additional layer of concrete will be removed until residual PCB concentrations achieve the Clean-Up Goal. Verification sampling locations are depicted on Figure 6.*

6. Section 5.0, p10. Basement Cleanup Plan. Regarding soil and concrete segregation, please see the comment for Section 4.0, p9, Paragraph 1. Additionally, it is unclear to EPA and CTDEEP why the areas west and east of the building are all being disposed as  $\geq 50$  ppm remediation waste, but the basement is proposed to be segregated for disposal purposes. Please provide additional discussion regarding the rationale for the different disposal approaches.

*Response: All soil or concrete removed from the site will be disposed of as PCB remediation waste, and the soil or concrete from the basement will not be segregated for disposal purposes. We note this is a change from the approach presented in the Notification.*

*Since the characterization sampling to the west (AOC-3) and east (AOC-6) of the building was not performed on a Subpart N grid and certain characterization samples were collected over larger intervals (up to 2 feet in length), we acknowledge that PCB concentrations above 50 mg/kg could be present in these areas. We therefore conservatively plan to dispose of these materials at a chemical waste landfill or Subtitle C landfill permitted to take PCB remediation waste at a concentration greater than 50 mg/kg.*

*As indicated above in the response to Comment 4, since the sampling within the basement was not performed on a Subpart N grid, the concrete and soil generated from the remedial activities within the basement will not be segregated and will be disposed of at a chemical waste landfill or Subtitle C landfill permitted to take PCB remediation waste at a concentration greater than 50 mg/kg.*

7. Section 5.0, p 11 The Building Materials RAP identifies that the paint on the remaining columns and beams will be abated, and two layers of epoxy paint will encapsulate the surface of the structures. EPA's understanding is that the basement will be converted into residences. If this is the case PCB concentrations  $> 1$  ppm may not remain in the structures. Please provide discussion concerning the concentrations of PCBs that will remain and the purpose of the encapsulation.

*Response: The focus of the Notification was the remediation of soil in exterior areas and below the basement floor and the concrete in the basement of the building to levels that meet the unrestricted, high occupancy use (less than or equal to 1 mg/kg) under 761.61(a)(4)(i)(A). This comment however appears to be focused on the remediation of PCB impacted building materials. As described in our February 2023 PCB Risk Assessment Workplan (the Workplan), GZA is in the process of completing a risk assessment and numerical modeling to support submission of a Modified Building Materials Remedial Action Plan (RAP) consistent with a Risk-Based Cleanup under 40 CFR 761.61(c). Based on our recent discussion, it is our understanding that EPA and CTDEEP acknowledge that a separate document focused on building materials will be submitted and that any determinations relative to residual PCB concentration levels within building materials will be deferred until this future document is reviewed.*

8. Section 5.0, p11. Please also note that, according to Subpart O, verification samples are to be taken from both excavation bottoms and sidewalls.



*Response: Understood and please refer to the attached figures for the proposed sidewall and bottom verification sampling locations.*

9. Figure 3, p23. Figure 3 shows a Floor Drain Pit on the southwest portion of the basement. EPA could not find any discussion of this pit in the narrative portion of the Notification. Please provide additional discussion regarding this pit, including but not limited to, the depth of the pit, what exists at the bottom of the pit, whether samples have been taken of the pit (and where), and future plans for this pit.

*Response: This pit is approximately 44-inches by 32-inches and 24 inches deep with concrete sidewalls and a concrete base. A 4-inch pipe is present within the center of the pit that reportedly formerly discharged to the sanitary sewer located to the west of the building. Approximately 1-inch of sediments is present within the base of the pit. No sampling of the sediments has been previously performed.*

*The limited sediments within the pit will be removed and conservatively disposed off-Site at a chemical waste landfill or Subtitle C landfill permitted to take PCB remediation waste. After removal of the sediments, the concrete base and sidewalls will be sampled to confirm PCB concentrations are less than or equal to 1 mg/kg. If PCB concentrations in the concrete are less than or equal to 1 mg/kg, the pit will be filled and the opening to the pit sealed with a new concrete floor. If PCB concentrations are greater than 1 mg/kg, the concrete sidewalls and base and underlying soil (if necessary) will be removed until verification sampling demonstrates that PCB concentrations are less than or equal to 1 mg/kg.*

10. Figure 3, p23. Figure 3 shows a "Sub-Basement Level Raceway (Former Turbine Equipment Area)". EPA is unable to find any discussion in the Notification regarding this raceway and former turbine equipment area. From the figure, it also does not appear that this area has been characterized by sampling. Please provide additional discussion regarding the Sub-Basement Level Raceway and Former Turbine Equipment Area, including any sampling planned for the area.

*Response: A water sluice/raceway extended from the Hockanum River into the northern portion of the basement in the southern portion of the building where a water wheel and subsequently a turbine was present to power the former mill. The water sluice/raceway was formerly sealed as it enters the east side of the basement, and all of the former hydro-powered equipment was previously removed from the Site before the Site was acquired by the Town. The base/floor of the water sluice/raceway area is approximately 8 feet below the surrounding basement floor and is comprised of soil that appears to have been used to fill the area after removal of the power generating equipment. A platform constructed of non-painted wood timber and non-painted planking extends over the water sluice/raceway and allows access to the southern portion of the basement in the southern portion of the building. The floor in the southern portion of the basement in the southern portion of the building consists of a concrete floor. Refer to Figure 2 for details on this portion of the basement.*

*No sampling of the concrete floor, sub-slab soil, or soil within the water sluice/raceway area for PCBs has been performed in the southern portion of the basement of the building. The concrete floor in the southern portion of the basement in this portion of the building will be scarified. The initial scarification depth will be 1-inch. If after removal of this upper inch of concrete PCB concentrations still exceed 1 mg/kg, an additional layer of concrete will be removed until verification sampling demonstrates that residual PCB concentrations are less than or equal to 1 mg/kg. The soil within the base/floor of the water sluice/raceway area will be sampled consistent with a Subpart N sampling grid to evaluate PCB concentrations. If PCB concentrations are greater than 1 mg/kg, the soil will be removed and disposed off-Site based on the detected*



*concentrations and verification samples will be collected to confirm residual PCB concentrations are less than or equal to 1 mg/kg.*

*Although it is not painted, the wood platform structure extending over the water sluice/raceway will be conservatively disposed as PCB bulk product waste.*

11. Figure 3, pg. 23. In Figure 3, there appears to be a bedrock outcrop in the northeast portion of the basement. EPA is unable to find any discussion regarding this bedrock. Please provide additional discussion regarding this bedrock outcrop, including but not limited to, whether any sampling is proposed and the future use of this area. EPA also requests additional discussion regarding the competency of the bedrock, especially in this area.

*Response: As indicated above, the building including the basement are being renovated for residential uses and there are no plans to remove the bedrock outcrop since the foundation of the building in this area is bearing directly on the bedrock outcrop. The bedrock is assumed to be structurally competent since it has supported the building since the late 1800s.*

*The bedrock outcrop is non-stained and non-painted and no sampling of the bedrock outcrop has been performed. Since there does not appear to be a direct or secondary (e.g., tracking) release mechanism that would impact the surface of the bedrock, no sampling of the bedrock outcrop is planned.*

12. Figure 3, p23. Figure 3 shows an area on the eastern part of the property called the Sheet Metal Workshop. Is this area considered part of this Site? Is this area also planned for Residential development? If so, have any samples been taken from this area, or is any future sampling planned? This comment also applies to the area designated as the Former Boiler Room in the northwest portion of the property. Please provide additional discussion regarding the areas designated as Sheet Metal Workshop and Former Boiler Room, including but not limited to, whether any sampling is proposed and the future use of these areas.

*Response: The sheet metal workshop is part of the building and the Site; however, this section of the building is not equipped with a basement. Similar to the rest of the building, the sheet metal workshop will be renovated for residential use. Samples have not been collected of the concrete floor within the sheet metal workshop to date. As part of the remedial activities, the concrete floor within the sheet metal workshop will be scarified. The initial scarification depth will be 1-inch. If after removal of this upper inch of concrete verification sampling indicate PCB concentrations exceed 1 mg/kg, an additional layer of concrete will be removed until residual PCB concentrations are less than or equal to 1 mg/kg.*

*The former fuel oil fired boiler room is also part of the building/Site and is not equipped with a basement. The former boiler room and the adjacent loading dock on the west side of the building will be demolished and conservatively disposed of as PCB bulk product waste. The concrete floor of the former boiler room will also be removed as part of the redevelopment. Prior to removal, samples will be collected of the upper 0.5-inch of the concrete floor of the boiler room to evaluate the presence of PCBs and proper disposal methods.*

13. Figure 3, p23. Figure 3 shows an area where transformers were formerly located exterior to the building. In Daniel's Mill's Response to EPA Comments, dated August 29, 2022, it was stated that these former transformer pads would be "addressed in a separate soil and groundwater remedial action plan." EPA is unable to locate any discussion of these former transformer pads in the current Notification, and it is unclear whether these pads were intended to be addressed in the current Notification, or if there is a future





Notification intended to address these pads. Please clarify whether these former transformer pads are intended to be addressed in this or another Notification.

*Response: Based upon information in a 2014 Phase I Environmental Site Assessment (ESA) prepared by Fuss & O'Neill, Inc., three transformers were shown at the southwest corner of the building. Available documents did not indicate if the transformers were pad-mounted or pole-mounted. GZA questioned the owner of property about the transformers in the 2014/2015 timeframe as part of a Phase II ESA and the owner indicated the former transformers were mounted on the southern side of the building at the top of the first floor (not ground-mounted on a concrete pad). GZA observed the area where the transformers were reportedly located and observed heavy metal brackets mounted on the exterior wall of the Site building approximately 10-15 above the ground. GZA accessed the area below the metal brackets via a doorway from the building basement and observed that the ground surface consisted of a steep slope constructed with stones (rip-rap) with little to no soil present in between the stones. GZA did not observe any indications of a release (e.g., oily staining, petroleum odors) on the rip-rap or the building walls in the vicinity of the metal brackets that might indicate a release from the former transformers. Given the absence of soil and visual evidence of a release and the steepness of the slope in this area, no sampling is proposed for this area.*

Should you have any questions or comments regarding the information presented herein, please do not hesitate to contact David Rusczyk at 860-858-3310 or david.rusczyk@gza.com.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

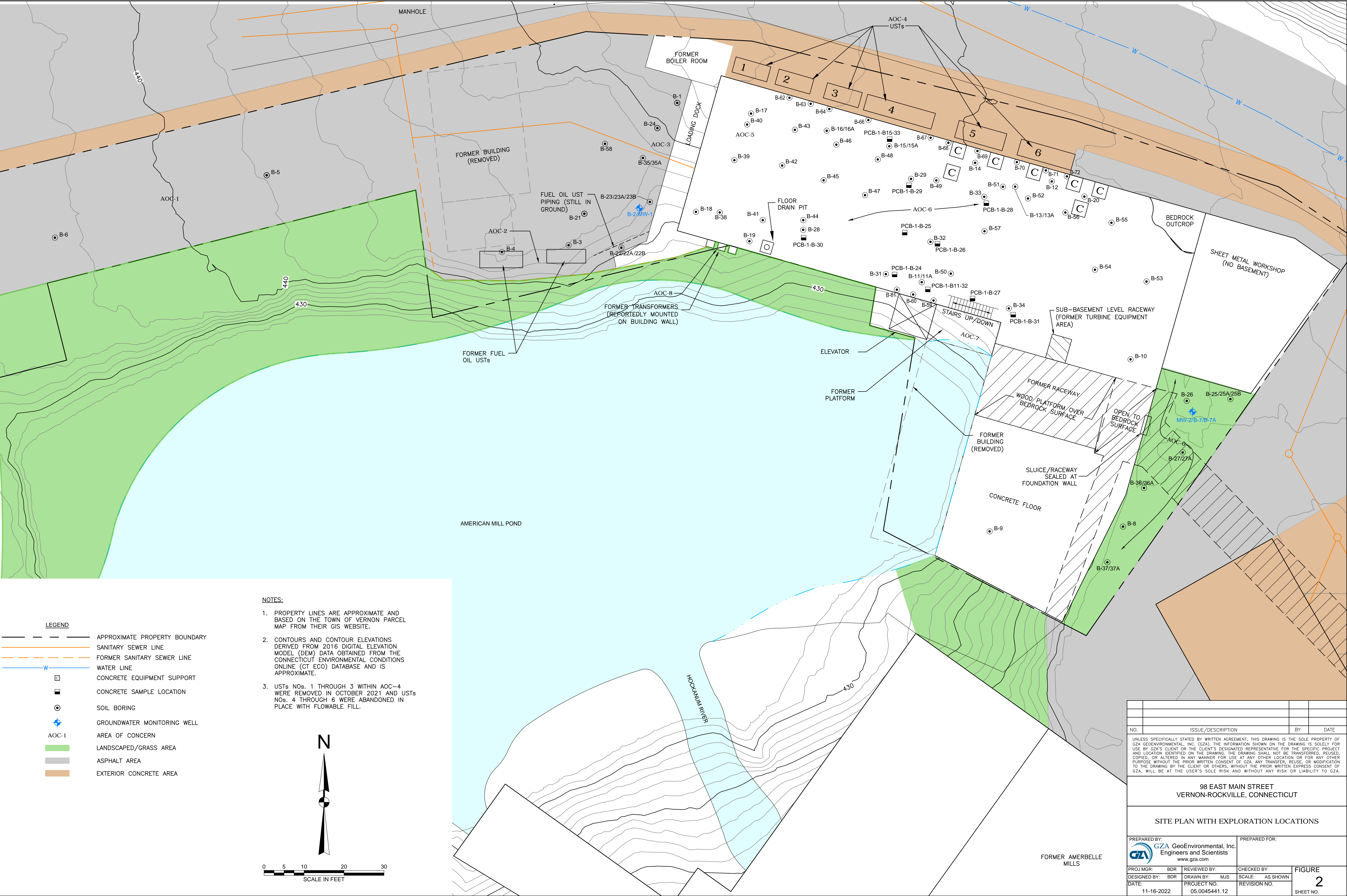
David Rusczyk, P.E.  
Associate Principal

Adam Henry, PG, LEP  
Principal

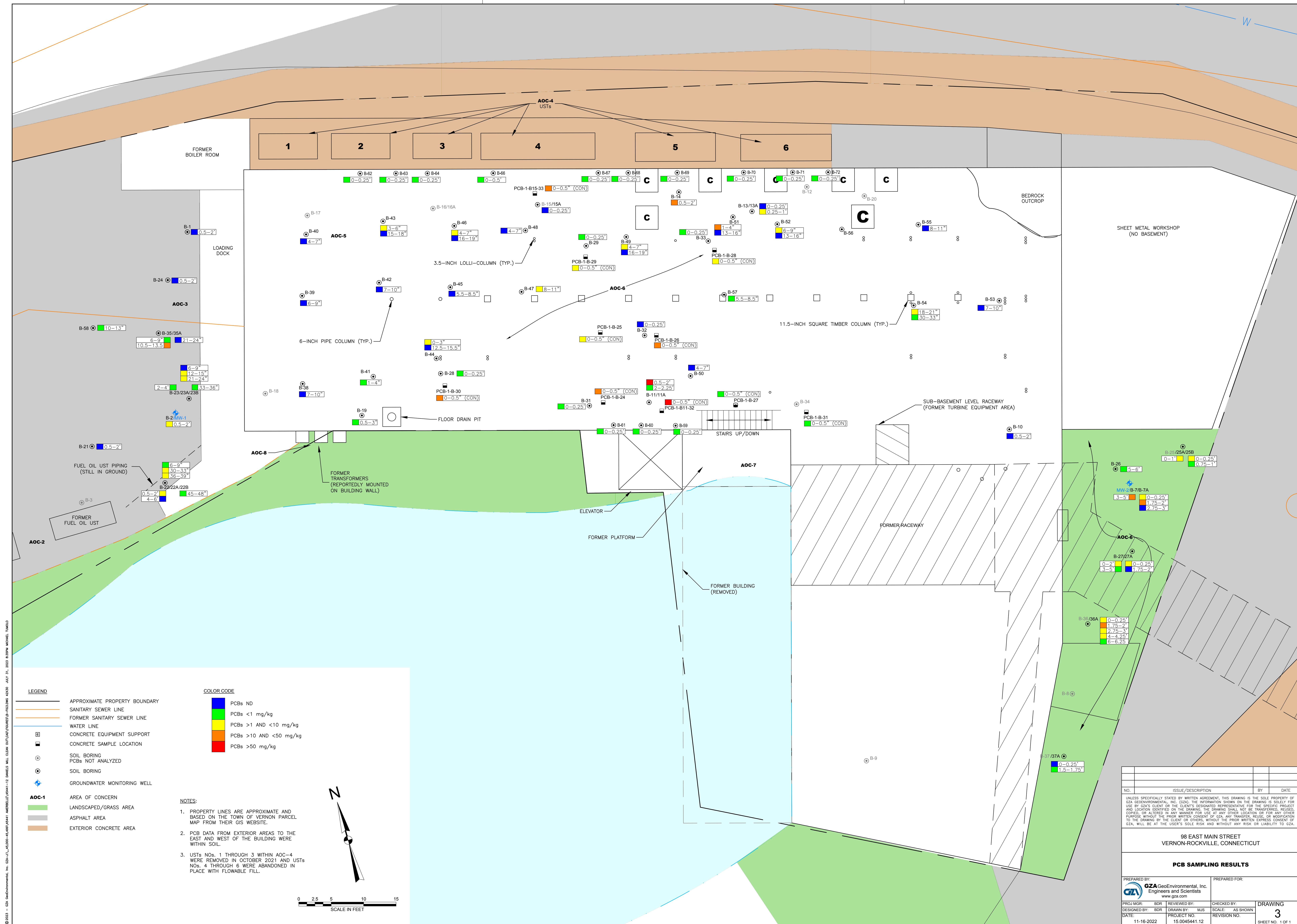
Attachments:      Figure 2: Site Plan With Exploration Locations  
                             Figure 3: PCB Sampling Results  
                             Figure 4: PCB Excavation Area West of Building  
                             Figure 5: PCB Excavation Area East of Building  
                             Figure 6: Basement Remediation Plan Concrete and Soil

cc: Katherine Woodward, Environmental Protection Agency  
      Shaun Gately, Town of Vernon  
      Gary Trombly, CT Department of Energy and Environmental Protection  
      Amber Trahan, CT Department of Energy and Environmental Protection  
      John Gumpert, Vernon Mill, LLC  
      Malcolm Beeler, Weston & Sampson







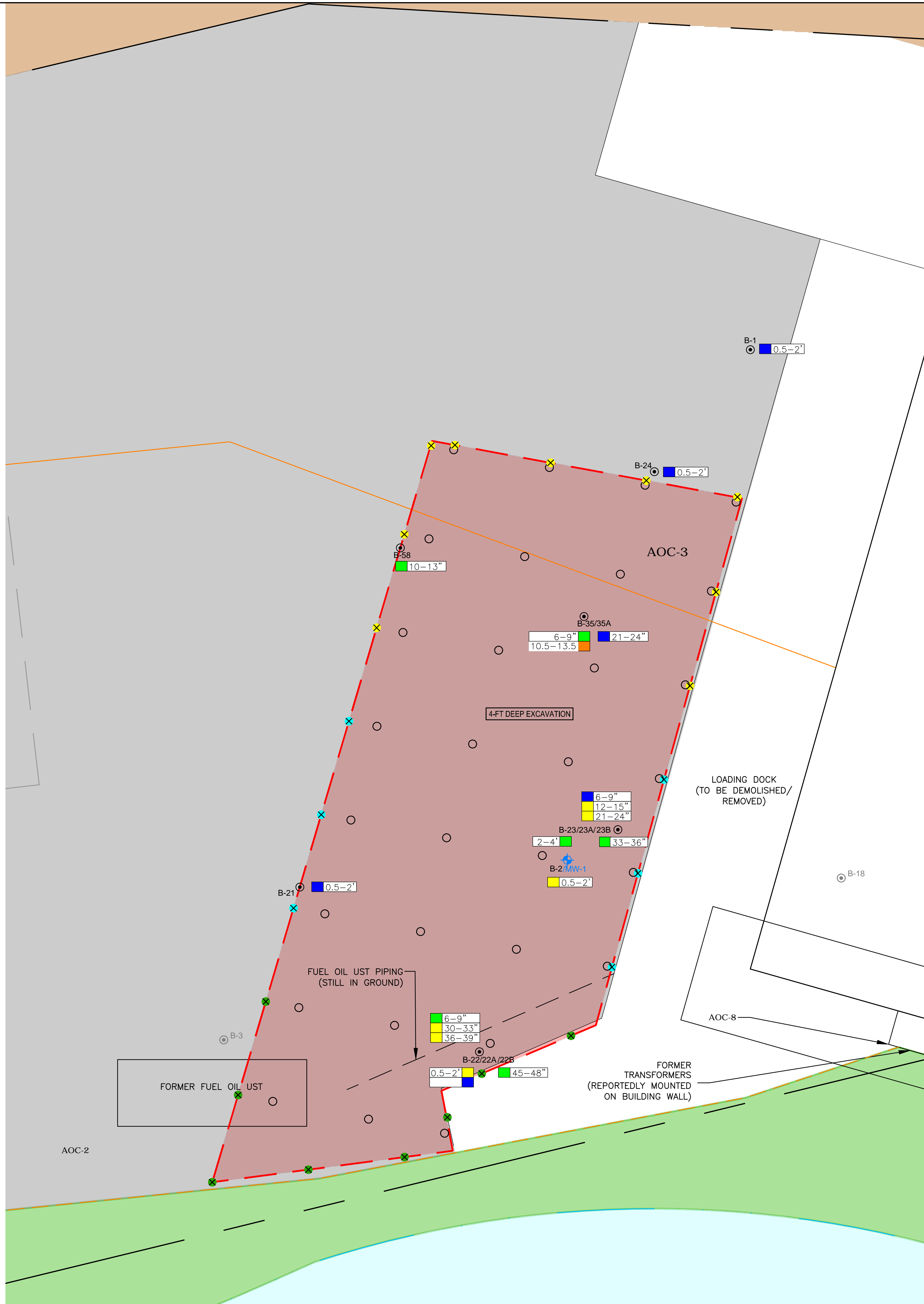
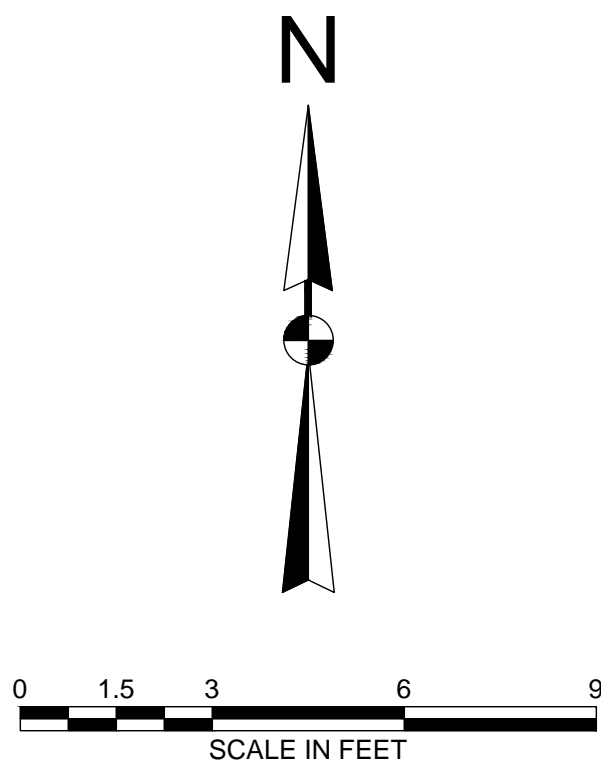




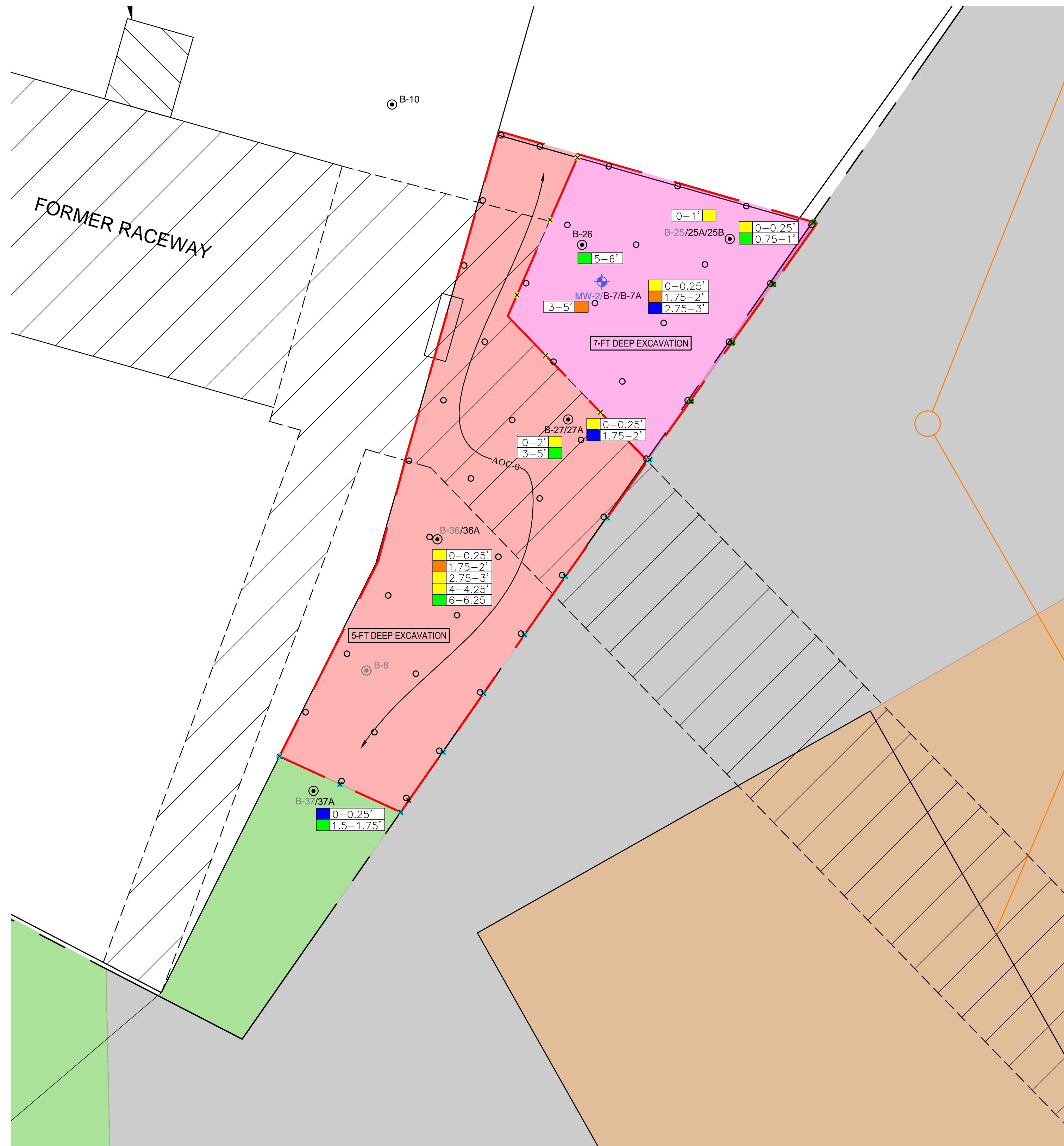
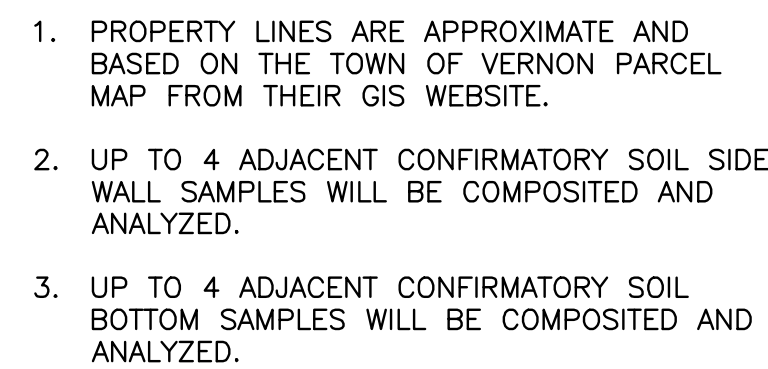
- LEGEND**
- APPROXIMATE PROPERTY BOUNDARY  
--- SANITARY SEWER LINE  
--- FORMER SANITARY SEWER LINE
- ⊙ SOIL BORING  
⊙ SOIL BORING  
PCBs NOT ANALYZED  
⊕ GROUNDWATER MONITORING WELL  
○ VERIFICATION SOIL BOTTOM SAMPLE  
× VERIFICATION SOIL SIDEWALL SAMPLE  
× VERIFICATION SOIL SAMPLING INTERVALS  
10.5"–13.5" BELOW GRADE  
× VERIFICATION SOIL SAMPLING INTERVALS  
12"–15" BELOW GRADE  
21"–24" BELOW GRADE  
⊗ VERIFICATION SOIL SAMPLING INTERVALS  
9"–12" BELOW GRADE  
21"–24" BELOW GRADE  
33"–36" BELOW GRADE
- AOC-1 AREA OF CONCERN  
LANDSCAPED/GRASS AREA  
ASPHALT AREA  
CONCRETE AREA  
PROPOSED SOIL EXCAVATION AREA


- COLOR CODE**
- PCBs ND  
PCBs <1 mg/kg  
PCBs >1 AND <10 mg/kg  
PCBs >10 AND <50 mg/kg  
PCBs >50 mg/kg

- NOTES:**
1. PROPERTY LINES ARE APPROXIMATE AND BASED ON THE TOWN OF VERNON PARCEL MAP FROM THEIR GIS WEBSITE.
  2. UP TO 4 ADJACENT CONFIRMATORY SOIL SIDE WALL SAMPLES WILL BE COMPOSITED AND ANALYZED.
  3. UP TO 4 ADJACENT CONFIRMATORY SOIL BOTTOM SAMPLES WILL BE COMPOSITED AND ANALYZED.

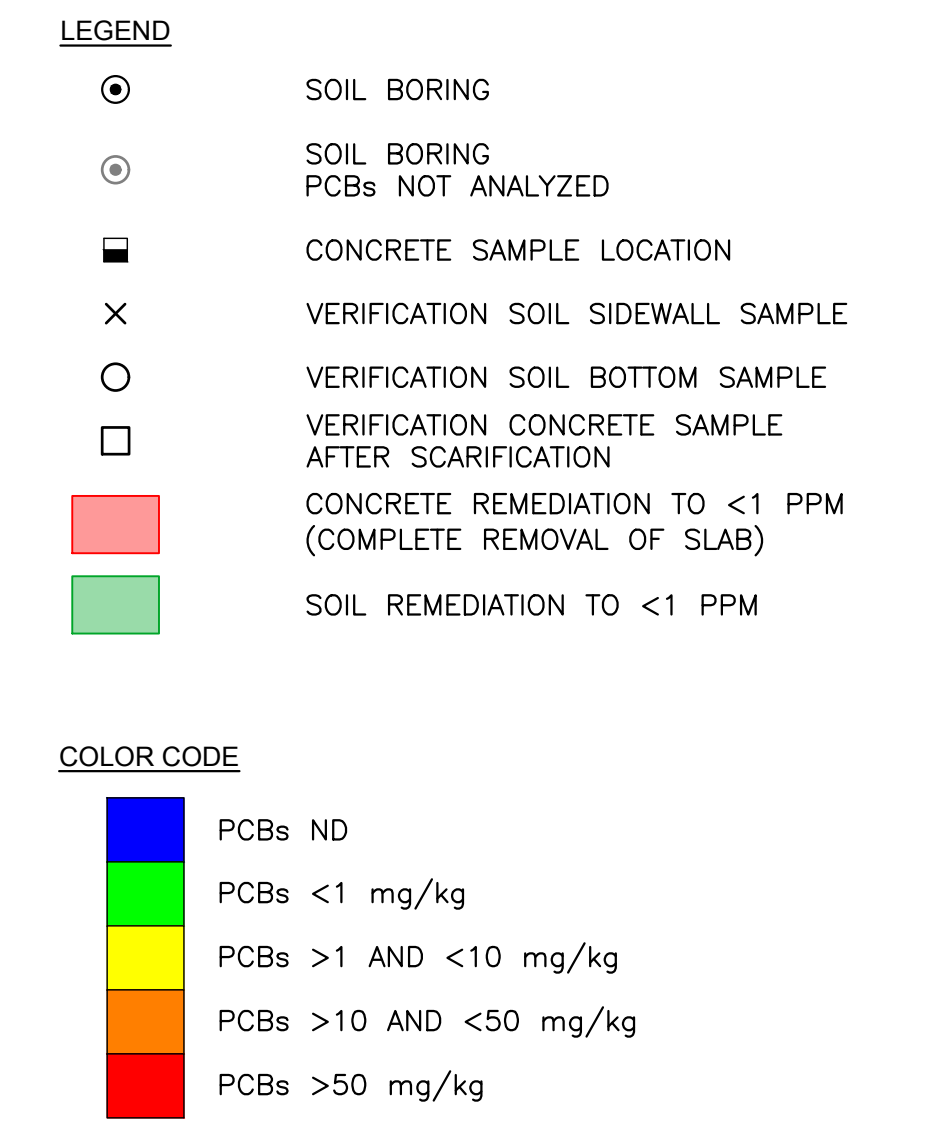


NO.	ISSUE/DESCRIPTION	BY	DATE
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98 EAST MAIN STREET VERNON-ROCKVILLE, CONNECTICUT			
PCB EXCAVATION AREA WEST OF BUILDING			
PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com		PREPARED FOR:	
PROJ MGR: BDR	REVIEWED BY: MUS	CHECKED BY:	FIGURE
DESIGNED BY: BDR	DRAWN BY: MUS	SCALE: AS SHOWN	4
DATE: 11-16-2022	PROJECT NO. 05.0045441.12	REVISION NO.	SHEET NO.



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<p style="text-align: center;"><b>98 EAST MAIN STREET VERNON-ROCKVILLE, CONNECTICUT</b></p>			
<p style="text-align: center;"><b>PCB EXCAVATION AREA EAST OF BUILDING</b></p>			
<p>PREPARED BY:   <b>GZA GeoEnvironmental, Inc.</b>          Engineers and Scientists  <a href="http://www.gza.com">www.gza.com</a> </p>		<p>PREPARED FOR:</p>	
<p>PROJ MGR: BDR          DESIGNED BY: BDR          DATE:</p>	<p>REVIEWED BY: MJS          DRAWN BY: MJS          PROJECT NO:</p>	<p>CHECKED BY:          SCALE: AS SHOWN          REVISION NO.</p>	<p><b>FIGURE</b>  <b>5</b>          SHEET NO.</p>
11-16-2022	05.0045441.12		





- NOTES:**
1. UP TO 4 ADJACENT CONFIRMATORY SOIL SIDE WALL SAMPLES WILL BE COMPOSITED AND ANALYZED.
  2. UP TO 4 ADJACENT CONFIRMATORY SOIL BOTTOM SAMPLES WILL BE COMPOSITED AND ANALYZED.

