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DEPARTMENT OF ENERGY AND ENVIRONMENTAL PROTECTION REMEDIATION DIVISION LEAKING UNDERGROUND STORAGE TANK COORDINATION PROGRAM

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Part I: Primary Recipient*: Remediation Program (* required)

For Remediation documents:	For LUST documents:
Primary Program*: Other Remediation Program	UST Facility ID:
Rem ID*: 0	Spill Case Number:

Part II: Site Information

Site Name*: Daniel's Mill Site Address*: 98 East Main Street				
City/Town*: Vernon	State: CT	Zip Code: 06066		
Secondary Programs (complete as many as applicable for this document):				
Program: Select Secondary Program		Project ID:		
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Part III: Document Information (document type required for appropriate program[s] only)

Remediation*: Remedial Action Pla	n (RAP)	
LUST*: LUST Document Type		
Date of Document*: 12/8/2021	Version: Final	

Part IV: Submitter Information

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REPORT

December 2021

Town of Vernon

Building Materials PCB Remediation Plan Daniel's Mill Building



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DANIEL'S MILL BUILDING PCB RAP

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EXECUTIVE SUMMARY

The Daniel's Mill Building is located at 98 East Main Street, Vernon, Connecticut (Site), see Figure 1. The structure has a footprint of approximately 9,050 square feet and is six stories tall including the basement and attic. The building has been vacant since 2015, and the Town of Vernon (Town) took ownership of the property on June 21, 2021, through a tax collectors deed. The Town has been awarded a Brownfields Grant to remediate the structure and other Site impacts from the Connecticut Department of Economic and Community Development (CT DECD). The Town has also submitted a Brownfields Grant Application to the United Stated Environmental Protection Agency (EPA). Following abatement of PCB building materials, the building will be restored and developed for mixed residential and commercial uses.

Hazardous building materials (HBM) assessments were performed at the Site in 2015 and 2019 and building materials containing polychlorinated biphenyls (PCBs) were identified throughout the structure. PCB-containing building materials included paint, coatings applied to wood floorings, caulks, and glazings. Samples were also collected of concrete flooring but the source of PCBs in that concrete is most likely due to releases of PCBs during operations within the building and not from building materials. Remediation of impacts to concrete flooring will be described in a separate remedial plan.

Regulatory Background

Federal regulations for PCBs are found in the Code of Federal Regulations, Chapter 40, Part 761 (40 CFR Part 761). In those regulations, PCBs in building materials are not authorized for continued use if PCB concentrations, at the time of application (e.g., when paint was originally applied to a surface), were greater than or equal to (\geq) 50 mg/kg and are defined as PCB bulk product wastes in §761.3. If PCB concentrations have been diluted by subsequent operations (e.g., application of additional paint to a painted surface), such building materials that, as a result, contain less than (<) 50 mg/kg are also classified as PCB bulk product waste.

PCBs in building materials may also release to the building substrates to which they have been applied (e.g., wood to which paint has been applied). The building substrate is classified as a PCB remediation waste if PCBs are found at any concentration. These building substrates can be removed with the PCB bulk product waste that has been applied and disposed of as PCB bulk product waste. If the building substrate is to remain in place following removal of the PCB bulk product waste and PCBs are found in the substrate at a concentration >1 mg/kg, a barrier or encapsulant must be placed over the building substrate.

The Connecticut Department of Energy and Environmental Protection (CT DEEP) has developed guidance for removal of PCBs in building materials based upon Connecticut General Statutes (CGS) 22a-463 through -469, inclusive. CT DEEP guidance requires that building materials >1 mg/kg be removed from the structure. In addition, if the building material removed is not classified as a PCB bulk product waste as defined in the Federal regulations and building substrate PCB concentrations are >1 mg/kg, CT DEEP guidance requires removal of the building substrate as well.

Investigation Findings

Results for PCBs in building materials are summarized as follows:

• A total of 18 samples were collected of wood flooring within the structure from the first floor to the attic. PCBs were detected in all 18 samples with concentrations ranging from 2.8 mg/kg to 147 mg/kg with an average concentration of 42.7 mg/kg. The source of the PCBs is believed to



be a coating applied to the wood as the consistency of the results and spatial distribution of the samples do not suggest a direct release mechanism or tracking. Thus, the wood coating is classified as a PCB bulk product waste. Wood floors will be removed and disposed of as PCB bulk product waste.

- A total of 16 samples were collected of wood flooring subbase within the structure from the first floor to the attic. PCBs were detected in all 16 samples with concentrations ranging from 0.5 mg/kg to 48.1 mg/kg and an average of 5.9 mg/kg. The source of the PCBs is believed to be from releases from the coating that was applied to the wood floor. The wood flooring subbase is classified as a PCB remediation waste and will remain in place because the subbase is structural and cannot be removed. The wood floor subbase will be encapsulated during restoration of the structure following abatement of PCB bulk product wastes.
- A total of 17 paint samples of multiple different colors were collected from all floors of the structure. A history as to when and how many coats of paint have been applied to the structure cannot be determined from available records. However, PCBs were detected in all 17 paint samples at concentrations ranging from 11.8 mg/kg to 163 mg/kg with an average concentration of 69 mg/kg. As such, it is assumed that the concentration of PCBs in the paint was ≥50 mg/kg at the time of application and all paints within the structure will be classified as a PCB bulk product waste. Paint will be removed from the surfaces to which they have been applied and disposed of as PCB bulk product waste.
- A total of 29 samples were collected from painted structural wood (i.e., columns, trusses, and ceilings) within the building. PCBs were detected in 29 of these samples with concentrations ranging from 0.30 mg/kg to 254 mg/kg with an average concentration of 17.4 mg/kg. The source of PCBs in the wood is believed to be paint applied to the structure. As such, the wood is classified as a PCB remediation waste. The structural wood will be encapsulated during restoration of the structure following abatement of PCB bulk product wastes.
- A total of 21 samples of brick or plaster applied over brick were collected within the building. PCBs were detected in 20 samples with concentrations ranging from 0.10 mg/kg to 12.6 mg/kg. The source of the PCBs in the brick and plaster is believed to be paint applied to these surfaces. As such, the brick and plaster are classified as a PCB remediation waste. Plaster materials will be removed with paint during abatement and disposed of as PCB bulk product waste. The brick is structural and will remain in place following abatement and will be encapsulated during restoration of the structure.
- Two samples of window glaze and an additional three samples of door caulk were collected. PCBs were detected in all of these samples but at concentrations much less than 50 mg/kg. A potential source for release of PCBs to these compounds has not been identified. Thus, these materials are classified as Excluded PCB Products under the federal regulations, but removal is required under CT DEEP guidance. The windows and doors will be removed during abatement along with the caulks and all of the materials disposed of as PCB bulk product waste.

Project Objectives and Remedial Goals

The objectives of this remediation are to remove the PCB bulk product wastes (e.g., paint and wood flooring) and non-structural PCB remediation wastes (e.g., plaster over brick) from the building and to dispose of the wastes in an appropriate fashion. Door caulks and window glazings classified as Excluded PCB Products will also be removed and disposed as required under CT DEEP guidance. The



abatement will be performed to the extent required by federal and state regulations. Building restoration will be performed in a manner to be protective of future site users.

Dust control measures, likely consisting of constructed containment structures, will be employed during abatement and removal actions to prevent the release of potentially PCB-containing dust outside of the remediation area. Dust monitoring will be performed outside of the containments to measure the effectiveness of the containments in controlling dust and to determine if corrective measures are needed during the removal actions.

It is anticipated that remaining building substrates (e.g., structural wood members) will have total PCB concentrations >1 mg/kg following removal of PCB-containing building materials and will be classified as PCB remediation wastes. A combination of encapsulants and constructed barriers will be installed during building restoration to protect future Site occupants from direct exposure to remaining PCB-containing materials.

Following the completion of remediation and restoration at the Site, reoccupancy air testing will be performed to determine that inhalation of indoor air does not pose an excess risk to future site users. The continued effectiveness of encapsulants and barriers to prevent direct exposure to remaining PCB-containing building materials will be measured and maintained through implementation of an Inspection, Maintenance, and Monitoring Program.

This PCB Remediation Plan describes the characterization sampling performed, classification of building materials, remedial actions to be performed for PCB bulk product and remediation wastes, post-remediation sampling of building substrates and installation of barriers over PCB remediation waste building substrates following completion of remedial actions. This plan also describes air monitoring to be performed during abatement of PCB bulk product wastes, reoccupancy air sampling, and inspection and maintenance of barriers to be employed to determine that the future residential use of the Daniel's Mill Building does not pose an excess risk to future Site users.

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1.0 INTRODUCTION

The Daniel's Mill Building is located at 98 East Main Street in Vernon, Connecticut (Site), see Figure 1. The Site consists of an irregularly shaped parcel of approximately one acre. The Site is improved with a six-story structure (including basement and attic) with a footprint of approximately 9,050 square feet. The remaining portions of the Site are paved and serve as parking lots and driveways. The building is currently vacant. The Town of Vernon (Town) took ownership of the property on June 21, 2021, through a tax collectors deed. The current zoning of the Site is Historic District – Industrial.

This Remedial Action Plan (RAP) has been prepared to describe sampling and characterization of PCBcontaining building materials and actions to be performed to abate these materials. The Town of Vernon has received a Brownfields Cleanup Grant to the Connecticut Department of Economic and Community Development (CT DECD) and has applied to the United States Environmental Protection Agency (EPA) for a Brownfields Cleanup Grant as well. The cleanup described in this RAP will be performed by the Town, working with the developer Vernon Mill Owner, LLC (Developer), as part of remediation of the entire property if the grant is received. The Site would then be redeveloped for mixed use residential and commercial purposes as part of a larger redevelopment project.

1.1 Site Operations

The Site was reportedly developed in 1855 and the Site building was historically occupied as a textile mill (Sam Fitch's Knitting Mill, Carlisle Mill, S. Fitch & Sons Co. Knitting Mill, Rockville-Worsted Co., M.T. Stevens & Sons Co.) from the mid-1880s through the 1940s. Activities in the Site building during this period included a carpentry shop, a machine shop, knitting, carding, spinning, dyeing, drying and storage. The Site building was heated with coal through the 1940s. From the 1950s to 1970s, the Site was occupied by Double B Products Co., a producer of insecticides and paints, and Albi Manufacturing Company, a producer of fire-retardant paints. Operations by Albi Manufacturing is suspected to be the source of PCB releases not from building materials that will be remediated under a separate RAP to be submitted to EPA and the Connecticut Department of Energy and Environmental Protection (CT DEEP). Since the 1980s, the Site has been occupied by a variety of commercial entities and used as office and warehousing space, as well as self-storage.

Properties adjoining the Site to the west, east, and south were also historically occupied by textile mills. The property adjoining the Site to the south and east at 104 East Main Street was occupied by the Belding Bros. & Co Sewing Silk Mill from the 1880s to the 1920s-1930s, by the American Dyeing Corporation (wool dyeing) in the 1940s to 1960s, then by the Amerbelle Corporation (textile dyeing) from the 1980s until the mid-2000s. The property adjoining the Site to the west at 40 Brooklyn Street (aka 60 East Main Street) was occupied by the American Mills Co. (wool and worsted cloth mill) from the 1880s to the 1920s or 1930s, by the M.T. Stevens & Sons Co. (woolen yarn manufacturer) in the 1940s, by the Granby Corp. in the 1960s, then by Anocoil Corporation (lithographic plate manufacturer) from the 1980s to present.

1.2 Applicable Regulations

Federal regulations for PCBs are found in the Code of Federal Regulations, Chapter 40, Part 761 (40 CFR Part 761). In those regulations, PCBs in building materials are not authorized for continued use if PCB concentrations, at the time of application (e.g., when paint was originally applied to a surface), were greater than or equal to (\geq) 50 mg/kg. These building materials are defined as PCB bulk product wastes in §761.3. PCB concentrations diluted by subsequent operations (e.g., application of additional

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paint to a painted surface) such that the resulting building materials contain less than (<) 50 mg/kg total PCBs may also be classified as PCB bulk product waste.

PCBs in building materials may also release to the building substrates to which they have been applied (e.g., wood to which paint has been applied). The building substrate is classified as a PCB remediation waste if PCBs are found at any concentration. These building substrates can be removed with the PCB bulk product waste and disposed of as PCB bulk product waste. If the building substrate is to remain in place following removal of the PCB bulk product waste and PCBs are found in the substrate at a concentration >1 mg/kg, a barrier or encapsulant must be placed over the building substrate.

CT DEEP has developed guidance for removal of PCBs in building materials based upon Connecticut General Statutes (CGS) 22a-463 through -469, inclusive. CT DEEP guidance requires that building materials >1 mg/kg be removed from the structure. In addition, if the building material removed is not classified as a PCB bulk product waste as defined in the Federal regulations and building substrate concentrations are >1 mg/kg, CT DEEP guidance requires removal of the building substrate as well.

1.3 Remedial Tasks

The tasks for remediation include:

- Removal of those building materials classified as PCB bulk product wastes as their continued use is not authorized;
- Removal of non-structural building materials classified as PCB remediation wastes;
- Removal of Excluded PCB Products with PCB concentrations >1 mg/kg as required by CT DEEP guidance documents;
- Performing removal actions with dust control measures to limit the release of potentially PCB-containing dust from the remediation area;
- Performing dust monitoring to measure the effectiveness of the controls and to implement corrective actions, if needed;
- Sampling of building substrates that are to remain as part of the structure and that were in contact with any PCB-containing building materials removed from the structure to determine PCB concentrations;
- Restoring the structure in a manner that places barriers or encapsulants over remaining PCB remediation wastes with PCB concentrations >1 mg/kg to protect future Site users from direct exposure;
- Performing reoccupancy air sampling following Site restoration to evaluate risk posed by inhalation of indoor air;
- Implementing an Inspection, Maintenance, and Monitoring Program (IMMP) to measure and maintain the effectiveness of the encapsulant barriers in preventing direct exposure; and
- Recording on the land records the presence of PCBs at concentrations regulated for disposal.

1.4 Project Team

It is anticipated that the remediation project team will consist of the parties listed below. The responsibilities for each of these parties regarding the scope of work described in this Notification are described below and further detailed within.



- Owner The Town at the time these remedial actions will be performed, responsible for the performance of the work done by their contractors as described in this Notification and the EPA Approval to be issued for this project. The Town will work with the Developer in implementing the remediation and restoration of the structure after the removal of PCB-containing building materials.
- Remedial Contractor Contracted to the Town, responsible for performance of remediation activities (e.g., paint removal) and other activities designated to be their responsibility as described in this Notification, the EPA Approval, and the Contractor's Work Plan that they will prepare and submit to EPA and CT DEEP for review and comment.
- Remediation Observation Contractor Contracted to the Town and the Developer, responsible for the collection of samples and observation and documentation of the remedial and restoration activities as described in this Notification and the EPA Approval. The Remediation Observation Contractor will prepare closure documents for the Site.



2.0 BUILDING MATERIAL CHARACTERIZATION

Characterization of PCBs in building materials is documented in two reports:

- "Asbestos and Hazardous Building Materials Assessment, Daniel's Mill, 98 East Main Street, Vernon, Connecticut," GZA, September 1, 2015. An electronic copy of the report is provided in Appendix A.
- "Phase III Data Gap Investigation Report, Former Daniel's Mill, 98 East Main Street, Vernon, Connecticut," GZA, December 2019. An electronic copy of the report is provided in Appendix B.

These investigations identified PCB-containing building materials that includes; wood floors, wood floor subbase, paint, brick, window glaze, and door caulks. Concrete flooring was also sampled but PCB impacts to these building materials are likely due to releases of PCBs during manufacturing operations within the structure. The findings from these reports are summarized below. Sampling methods, analytical data reports, and data summary tables are included in the reports provided in Appendices A and B. Sampling methods for porous materials were performed in accordance with United States Environmental Protection Agency (EPA) standard operating procedures.

Figures 2 through 6, inclusive, show floor plans from the basement to the attic. Shown on these figures are the locations of Site Photographs that are attached in Appendix C. Not shown on the floor plans is the loading dock that was constructed on the western side of the first floor, but a photograph of this structure is included in Appendix C.

2.1 Wood Floor

Wood floors are present from the first floor to the attic of the structure and a small section in the basement that was not sampled. Sample data for wood floors collected during the 2019 investigation are summarized in Table 1 below.

Table 1				
	Summary of Wood Floor	Analytical Data		
Building Floor	Total PCB Results (mg/kg)	Min / Max (mg/kg)	Average (mg/kg)	
First	93.2 / 26.9 / 58.6 / 67.6	26.9 / 93.2	61.6	
Second	26.9 / 23.4	23.4 / 26.9	25.2	
Third	88.5 / 8.5 / 21.4 / 74.9	8.5 / 88.5	48.3	
Fourth	6.4 / 19.7 / 56.3 / 147 / 13.9	6.4 / 147	48.7	
Attic	2.9 / 2.8 / 29.1	2.8 / 29.1	11.6	
Overall		2.8 / 147	42.7	

A review of the sample data did not find a pattern in the PCB results that would indicate release areas or tracking from people walking out onto the floor from the elevator. Rather, the wood flooring appears to have been coated with a varnish or other material and the analytical results indicate that wood floors are universally impacted with PCBs. Thus, the source of the PCBs in the wood floors is believed to be from materials applied to all wood floors at the Site and are classified as a PCB bulk product waste.

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2.2 Wood Floor Subbase

A wood subbase is found beneath the wood floors at the Site. Sample data for the wood floor subbase collected during the 2019 investigation are summarized in Table 2 below.

A review of the sample data did not find a pattern in the PCB results that would indicate release areas and PCBs would not have been tracked onto the subbase. The source of PCBs in the wood subbase is believed to be from application of the wood treatments on the wood floors above and then diffusion of PCBs through the wood floors over time. Thus, the wood floors are classified as PCB remediation waste. However, as discussed in Section 3.1, the wood floor subbase is structural and cannot be removed. The wood flooring will be removed and the wood floor subbase will be left in place.

Table 2 Summary of Wood Floor Subbase Analytical Data				
Building Floor	Total PCB Results (mg/kg)	Min / Max (mg/kg)	Average (mg/kg)	
First	48.1 / 8.6 / 0.6	0.6 / 48.1	19.1	
Second	0.5 / 0.7	0.5 / 0.7	0.6	
Third	3.8 / 2.0 / 7.2 / 2.8	2.0 / 7.2	4.0	
Fourth	2.4 / 3.2 / 6.3 / 0.8	0.8 / 6.3	3.2	
Attic	2.3 / 1.4 / 2.9	1.4 / 2.9	2.2	
Overall		0.5 / 48.1	5.9	

2.3 Paint

As shown in the Site photographs included in Appendix C, paint has been applied to both structural wood and brick walls on each floor, the wood loading dock that was added to the west side of the structure on the first floor, and temporary structures within the building. No records are available for painting at the Site and observations of the structure indicate that there are several different types of paints that were applied at different times during use of the structure. Sample data for paint collected during the 2019 investigation are summarized in Table 3 below.

Table 3 Summary of Paint Analytical Data				
Building Floor	Total PCB Results (mg/kg)	Min / Max (mg/kg)	Average (mg/kg)	
First	63.8		63.8	
Second	17 / 37.4 / 17	17 / 37.4	27.2	
Third	79.9 / 102 / 32.1	32.1 / 102	67.1	
Fourth	61.4 / 69.3 / 52.3 / 135 / 140	52.3 / 140	91.6	
Attic	61.5 / 163	61.5 / 163	112	
Basement	11.8 / 58.5 / 67.4	11.8 / 67.4	138	
Overall		11.8 / 163	69	

The source of PCBs in the paint is believed to be from manufacture and not from releases of PCBs. Some of the paint results are <50 mg/kg but, because PCBs were detected in all of the sample and



may have been diluted by application of additional paints, all paints within the structure are classified as PCB bulk product wastes.

2.4 Structural Wood

As shown in the Site photographs included in Appendix C, paint has been applied to much of the structural wood members in the building. No records are available for painting at the Site and observations of the structure indicate that there are several different types of paints that were applied at different times during use of the structure. Sample data for structural wood collected during the 2019 investigation are summarized in Table 4 below.

Table 4 Summary of Structural Wood Analytical Data				
Building Floor	Total PCB Results (mg/kg)	Min / Max (mg/kg)	Average (mg/kg)	
First	3.0 / 1.4 / 4.6 / 254 / 0.9	0.9 / 254	52.8	
Second	2.2 / 11.7 / 1.6 / 6.2	1.6 / 11.7	5.42	
Third	0.5 / 3.7 / 0.3 / 0.6 / 18.4	0.3 / 18.4	23.5	
Fourth	2.6 / 0.7 / 1.6 / 0.4 / 2.6	0.4 / 2.6	1.58	
Attic	0.5 / 0.3 / 0.3 / 0.4	0.3 / 0.5	0.38	
Basement	35.4 / 3.9 / 28.7 / 96.4 / 17.1 / 6.1	3.9 / 96.4	31.3	
Overall		0.3 / 254	17.4	

The source of PCBs in the structural wood is believed to be from the paint that was applied as no pattern that might indicate releases of PCBs was identified and tracking of PCBs onto ceilings, columns, and trusses is considered unlikely. Thus, structural wood members to which paint has been applied are classified as PCB remediation wastes.

2.5 Plaster

Limited areas of plaster applied to brick walls are present throughout the building. Most of the plaster found in the building has been painted. Sample data for painted plaster collected during the 2019 investigation are summarized in Table 5 below.

Table 5 Summary of Plaster Analytical Data		
Building Floor	Total PCB Results (mg/kg)	
First	0.5	
Second	4.4	
Third	0.6 / 0.1	
Fourth	0.6 / 0.9	
Attic	0.8	
Basement	12.6 / 6.5	



Plaster within the building is classified as a PCB remediation waste because the source of the PCBs is believed to be from releases from the paint applied to the surface of the materials. As described in Section 3.1, plaster will be removed for disposal when the paint is also removed and both materials will be disposed of as PCB bulk product waste.

2.6 Brick

Perimeter walls of the structure are constructed of brick. No paint has been applied to exterior brick on the building and only limited areas of brick are painted on the interior. Sample data for painted brick collected during the 2019 investigation are summarized in Table 6 below.

Table 6 Summary of Brick Analytical Data		
Building Floor	Total PCB Results (mg/kg)	
First	0.2 / 0.1	
Second	0.3 / 4.1	
Third	0.5 / 0.2	
Fourth	<0.1 / 0.2	
Attic	0.5	
Basement	9.0 / 0.1 / 0.3	

Painted interior brick within the building is classified as a PCB remediation waste because the source of the PCBs is believed to be from releases from the paint applied to the surface of the materials. As described in Section 3.1, brick will remain in the structure after paint is removed.

2.7 Window Glaze

Most of the windows on the structure appear to be of the same vintage with limited replacements, may be from the original construction, and generally do not have glazing materials. Those glazings that are present on windows may have been applied during repairs or other maintenance on the structure and could be PCB containing. Sample data for window glazing collected during the 2019 investigation are summarized in Table 7 below.

Table 7		
Summary of Window Glazing Analytical Data		
Building Floor	Total PCB Results (mg/kg)	
Third	5.5	
Fourth	17.1	

The window glazes are classified as Excluded PCB Products because no sources of PCB releases were identified, and the source is believed to be from manufacturing of the glazing materials. Many of the windows are painted on the interior, and all paint on the structure are assumed to be PCB bulk product waste. All windows will be removed and replaced as part of the restoration of the building and the windows and glaze will be disposed of as PCB bulk product waste, due to the paint on the interior.

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2.8 Door Caulks

There are eight doors on the structure; they appear to have been installed at different times and are not original to the structure. Caulks were only identified on three separate doors. Sample data for door caulk collected during the 2015 investigation are summarized in Table 8 below.

The door caulks are classified as Excluded PCB Products because no sources of PCB releases were identified, and the source is believed to be from manufacturing of the materials. All doors will be removed and replaced as part of the restoration of the building and will be disposed of as PCB bulk product waste because many of the doors are painted on the interior and all paints are assumed to be PCB bulk product waste.

Table 8		
Summary of Door Caulk Analytical Data		
Building Floor	Total PCB Results (mg/kg)	
First	1.7 / 3.1 / 4.3	

2.9 Concrete Floor

Concrete floor is present throughout the basement area except for a small section of wood flooring in the southern wing of the basement. Sampling data for the Site indicates that concrete floors in the basement were impacted by the direct release of PCB-containing materials and that the releases have impacted soil beneath the concrete floor. Remediation of these impacts are covered in a separate remedial plan to be submitted to EPA and CT DEEP as there are different procedures and remedial goals for remediation of these impacts.

Limited areas of concrete floor are present on the first, second, and third floors of the structure immediately outside the elevator, which is located on the west side of the building. Sample data for concrete floors collected during the 2019 investigation. Evidence for a coating was not observed on the concrete floor and the source for PCBs on the concrete floor is assumed to be from tracking of PCB-impacted materials from the basement level. Thus, the concrete flooring is classified as a PCB remediation waste and remediation of these materials will be covered in the separate remedial action plan.

There was a single sample of mastic installed beneath linoleum tiling applied to the concrete floor on the second floor of the structure. The mastic samples had a total PCB concentration of 46.2 mg/kg. It cannot be determined if the PCBs in the mastic are from the manufacture of the material or if the mastic was applied to PCB-impacted concrete. Remediation of the mastic and the concrete will be discussed in the separate remedial plan.

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3.0 BUILDING MATERIALS REMEDIATION

PCB bulk product wastes identified in the structure include paint and wood floors. Identified PCB remediation wastes include concrete flooring on the first through third floor of the structure, structural wood, plaster, and brick. The wood floor subbase is also classified as a PCB remediation waste. As discussed above, remediation of the PCB remediation waste concrete floors will be covered in a separate remedial plan to be submitted to EPA and CT DEEP and will not be discussed further in this report.

In general, abatement of PCB containing materials will be done from the top down. Specifically, abatement of PCBs will begin on the attic level and be completed in the basement. On each floor, ceiling paints will be removed first, materials designated for removal will be abated from the walls, and wood floors will be removed last.

3.1 Building Materials Abatement

The following demolition and abatement activities will be performed to remove PCB bulk product wastes, non-structural PCB remediation wastes, and Excluded PCB Products for which removal is required to comply with CT DEEP guidance.

- Each floor will be cleared of debris and temporary walls prior to abating paint and removing flooring. Due to the presence of PCBs in all sampled paints, painted debris including painted temporary walls installed within the structure will be disposed of as PCB bulk product wastes. Unpainted debris will be disposed of as municipal solid waste.
- The painted wooden loading dock on the west side of the building will be demolished and disposed of as PCB bulk product wastes.
- Wooden floors will be removed from all locations that it is installed, basement up to and including the attic, and disposed of as PCB bulk product wastes. A second level of floor cover has been installed in some areas of the third floor and above. This second level of cover will be removed with the wood flooring and disposed of as PCB bulk product waste.
- Paint will be removed from walls, ceilings, and other structural members on all levels of the building through media blasting until there are no visual remnants of paint. The paint and blasting wastes will be removed of and disposed of as PCB bulk product wastes.
- Doors (8 total) and windows (190 total) along with any caulk will be removed and disposed of as PCB bulk product wastes.
- The elevator cab and elevator doors on each floor, which are all painted, will be removed and disposed of as PCB bulk product waste.

In total, it is estimated that 160 tons of PCB bulk product wastes will be removed and disposed from the structure. Following the completion of abatement activities, the building will be cleared of debris, constructed temporary walls, and wood floors materials. Paint and plaster will also have been removed from walls, ceilings, and structural members.

3.2 Air Monitoring

Air monitoring will be performed by the remedial contractor during removal actions for PCB-containing building materials. These data will be provided to the remediation oversight contractor on a weekly basis for review and inclusion in the final Remedial Action Report (RAR).

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Prior to performing any removal actions on each floor, the remedial contractor will seal any openings (e.g., stairwells, elevator shaft, any penetrations through the flooring) to the floors above and below. The remedial contractor shall also seal any openings to the exterior. Any openings created for access to the remediation area will be equipped with a decontamination chamber where personnel can don personal protective equipment (PPE) at the start of the day and remove the PPE for disposal with the PCB bulk product wastes generated during removal actions when exiting the remediation area.

The remedial contractor shall perform air monitoring on the floor below the remediation area and on the first floor when PCB-containing building materials are being removed from the basement using a dust monitor. The remedial contractor will determine background dust concentrations and record them at the start of each workday. Dust monitoring will be performed continuously during the performance of remediation activities and dust concentrations will be determined on a 15-minute time-weighted average. The remedial contractor will inspect containments and perform repairs should dust readings exceed background readings by 100 micrograms per cubic meter (μ g/m³). The remedial contractor will stop work if dust readings exceed determined background concentrations by 150 μ g/m³.

The remedial contractor shall perform periodic inspections outside the structure during the performance of removal actions. If the remedial contractor observes any dust exterior to the building, they shall stop work, inspect containments, and perform repairs as needed.

3.3 Post-Abatement Sampling

Post-abatement samples of porous materials will be collected following the EPA Region 1 Standard Operating Procedure and submitted for analysis of total PCBs using EPA Methods 3540 and 8082.

- Wood flooring will be removed from the basement to the attic over a total area of approximately 45,250 square feet. A total of 16 samples of the wood floor subbase have already been collected, (approximately 1 per every 2,830 SF), and PCBs were detected in all of the samples. Thus, all wood floor subbase within the structure will be classified as PCB remediation waste and no additional sampling will be performed.
- Paint will be removed from walls and ceilings from the first floor to the attic and from structural members (e.g., columns) on each floor over an area of approximately 136,000 SF. Following the removal of paint, a total of ten samples of materials remaining will be collected on each story, 60 total (approximately 1 per every 2,270 SF). Thirty of these samples will be collected from previously painted brick and the remainder will be collected of previously painted structural wood.
- Windows and doors will be removed and replaced. One sample will be collected per every three locations with caulk installed. Currently it is known that three doorways have caulk, and one sample would be collected.

No additional remedial actions will be performed for the flooring, walls, or ceilings and the sample results obtained would be used to document remaining PCB concentrations on the deed restriction recorded on the Site following the completion of the project. For the known door caulk locations (3 total), because this is an Excluded PCB Product and removal actions are being performed per state guidance, additional brick would be removed from sampling locations until post-abatement sampling results were <1 mg/kg total PCBs if there are no other PCB-containing materials (e.g., paint) installed at that location.

3.4 Site Restoration

Following the completion of building materials removal actions on each floor, the area will be cleaned to remove any dust remaining on surfaces. Ceilings, walls, and floors will be vacuumed with equipment equipped with high-efficient particulate absorbing (HEPA) filters. Then all surfaces will be wet wiped. The HEPA filters and swabs used in the wiping will be disposed as PCB bulk product wastes. Parts of the vacuum that contacted air flow will be deconned by swabbing with a swab soaked in a performance-based organic decontamination fluid (PODF) prior to demobilizing the equipment from the site.

The following site restoration activities are proposed:

- A barrier material will be placed over floor surfaces. Concrete will then be poured to form a continuous slab over the floor area. The barrier and concrete will serve to prevent direct exposure to any PCBs remaining following abatement. Inspection activities will include an evaluation of the condition of the concrete and performing repairs as needed. No wipe sampling of this constructed barrier is proposed.
- For walls and ceiling, two coats of varying colors of an epoxy-containing material will be applied. Inspection activities include an evaluation of the topcoat to determine that it is in good condition and that no wear is occurring (i.e., bottom coat is showing through) and performing repairs as needed. Wipe sampling of encapsulants will be performed on an annual basis.
- For aesthetic reasons, barriers may be constructed over some walls, ceilings, or columns within the structure. These barriers would be constructed in a manner that would prevent direct exposure. Inspection would involve determining that the constructed barriers were in good condition and repairs performed, if necessary. No wipe sampling of constructed barriers will be performed.
- New doors and windows will be installed to replace existing.
- A new elevator cab and doors will be installed to replace the painted materials to be removed from the structure.
- It is anticipated that a total of 100 floor penetrations will be made to install new utilities (e.g., electrical conduit and wiring, water supply, wastewater discharge). The floor penetrations will be made within containment to prevent discharge of dust potentially impacted by PCBs and all wastes generated will be disposed of as PCB remediation waste.

3.5 Reoccupancy Air Sampling

Following the completion of site restoration activities, reoccupancy air samples will be collected. One air sample will be collected on each floor of the structure (i.e., basement to attic), for six total plus one field duplicate. The samples will be collected using EPA Method TO-10A and analyzed for PCBs by homologs using EPA Method 680. Reoccupancy air samples will be considered acceptable if total PCB concentrations are \leq 5.0 nanograms per cubic meter (ng/m³). If a reoccupancy air sample exceeds 5.0 ng/m³, additional sampling will be performed on that floor until a passing result is achieved.

3.6 Waste Management

Disposal facilities for each of the waste streams described in this remedial plan will be determined by the selected remedial contractor. PCB bulk product wastes will most likely be disposed at the Waste Management Turnkey Landfill and PCB remediation wastes will most likely be disposed at the US Ecology Wayne Landfill. If a different landfill is selected by the remedial contractor, a modification request will be submitted to EPA prior to removing any wastes from the Site for disposal. Prior to

disposal of PCB wastes, waste profiles will be submitted to the selected landfill for review and approval. Sampling required to complete the waste profile will be conducted by the remedial contractor.

PCB bulk product wastes and PCB remediation wastes will be stored in lined containers that are covered when not in active use. An M_L label will be applied to the containers with a date indicating when wastes were first placed in the container. All containers will be removed from the site within 30 days of first use.

Waste storage containers in use will be surrounded with temporary fencing and an additional M_L mark will be placed on the temporary fencing. Because of limited space at the facility, it is not anticipated that full waste containers can be stored onsite for any period of time and will be removed from the Site for transport to the disposal facility after they are filled.

3.7 Decontamination

Following the completion of the cleanup, the selected remediation contractor will be responsible for the decontamination of equipment that has come in contact with PCB impacted media in accordance with the procedures specified in §761.79(c)(2)(i) or (ii). Solid wastes (e.g., personal protective equipment or containment structures) generated during decontamination activities will be stored, handled, and disposed of with the wastes with which they were generated (e.g., containments constructed to contain dust during abatement of PCB bulk product wastes will be disposed of as PCB bulk product wastes). Aqueous decontamination wastes will be tested to determine PCB concentrations. If PCB concentrations are <0.5 μ g/L, they will be sent offsite for decontamination at an appropriately permitted facility that can handle non-federally regulated aqueous wastes. If PCB concentrations are determined to be $\geq 0.5 \mu$ g/L, the aqueous wastes will be incinerated or decontaminated at a facility permitted to accept federal regulated PCB wastes.

3.8 Deed Restrictions

Following completion of the project, the Developer will record a notation on the deed to the property that indicates:

- Building materials impacted by PCBs are present in the building at concentrations regulated for disposal;
- The existence of encapsulants and constructed barriers that serve as a protective barrier to direct exposure; and
- The concentrations of PCBs in the building materials as determined by the post-abatement samples to be collected.

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4.0 PROJECT SUBMITTALS

The following provides the submittals that are required or anticipated during the execution of the remedial project.

4.1 Notification and Certification

In accordance with 40 CFR §761.61(a)(3)(E), this remedial plan serves as the Notification by the Town to the EPA Region 1 PCB Coordinator and will be provided to state (CT DEEP. Attached in Appendix D is a written certification, signed by a representative of the Town (owner of the property when the remediation will be performed) indicating that sampling plans, sample collection procedures, sample preparation procedures, extraction procedures, and instrumental/chemical analysis procedures used to assess or characterize the PCB impacts at the Site are on file at the location designated in the certificate and are available for EPA inspection.

4.2 Owner Submittals

In addition to the attached Certification, the Town will provide a letter to EPA within 10 days of receipt of the Approval agreeing to and accepting the conditions of the Approval. The Town will also notify EPA and CT DEEP in writing as to the planned start date for the remediation program as required in the EPA Approval. The start date notification will be provided a minimum of 14 days in advance of starting the project or as otherwise required in the EPA Approval.

4.3 Remediation Observation Contractor Submittals

It is anticipated that the Remediation Observation Contractor, a third party selected by the Developer, will submit the following to EPA and CT DEEP:

- Written certification indicating that they have read the Notification and the EPA Approval and that they agree to abide by the conditions of the documents;
- Written certification from the analytical laboratory selected by the Remediation Observation Contractor indicating that they have read the Notification and the EPA Approval and that they agree to abide by the conditions of the documents;
- A Remedial Action Report following the completion of the remediation as described in the Notification and further described in Section 5.2.

4.4 Remediation Contractor Submittals

The Remediation Contractor will submit the following to EPA and CT DEEP:

• Written certification indicating that they have read the Notification and the EPA Approval and that they agree to abide by the conditions of the documents; and

4.5 Submittals Schedule

The following provides a schedule for the submittals described above.

- Written certifications will be submitted to EPA following selection of the contractors responsible for that scope of work and described above and prior to initiating any abatement activities.
- The final Remedial Action Report, as described in Section 5.2, will be submitted to EPA following completion of the project and receipt of reoccupancy air samples for review and comment.



5.0 DOCUMENTATION AND REPORTING

Remediation activities will be overseen by a third party (Remediation Observation Contractor) selected by the Developer. This third party will be familiar with the project and the requirements of this Notification and the EPA Approval. They will be responsible for preparing and maintaining a record of the remediation activities performed and for preparation and submittal of the final Remedial Action Report. The Remediation Observation Contractor will document that the project is completed in accordance with these requirements.

5.1 Field Documentation

The following list identifies the specific documentation and reporting requirements required for this project.

- Preparation of submittals to regulatory agencies as described in this remedial plan;
- Maintaining an accounting of PCB bulk product and PCB remediation wastes removed/transported off-site for disposal (including collecting manifests), and any other records related to off-site disposal of these materials and any other PCB wastes generated during the remediation;
- Photographic documentation of executed field activities, and other pertinent observations;
- Documenting that site containment structures are adequately maintained throughout the project;
- Collection of post-abatement and reoccupancy air samples;
- Photographic documentation of Site restoration activities, which shall include installation of barriers and encapsulants; and
- Documenting decontamination of materials that have contacted PCB wastes prior to demobilization from the site.

5.2 Post-Remediation Reporting

Following completion of remediation activities, a Remedial Action Report will be prepared by the Remediation Observation Contractor to document remediation activities. The report will describe the completed work at the site, will be submitted on the schedule required in the EPA Approval, and contain the following items and any additional information required by the EPA Approval:

- Project narrative;
- Record drawing(s) showing the removal of PCB bulk product and PCB remediation wastes, areas to which encapsulants have been applied, and locations where barriers have been constructed;
- Waste disposal documentation (manifests, bills-of-lading, certificates of disposal, etc.);
- Documentation of materials incorporated into the project (e.g., encapsulants);
- Photographs of remediation activities;
- Results from sampling of building substrates following the removal of PCB bulk product and PCB remediation wastes;
- Results from the reoccupancy air sampling;

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- A Final Inspection, Maintenance, and Monitoring Program to be implemented to maintain the effectiveness of the encapsulants as a barrier; and
- The Environmental Use Restriction filed for the property and a certification, signed by the owner, that a notation has been recorded on the land records indicating the presence of PCBs regulated for disposal.



6.0 REFERENCES

"Asbestos and Hazardous Building Materials Assessment, Daniel's Mill, 98 East Main Street, Vernon, CT." GZA, September 1, 2015.

"Phase III Data Gap Investigation Report, Former Daniel's Mill, 98 East Main Street, Vernon, Connecticut," GZA, December 2019.



FIGURES



PLEASANN Site Location is=T-USGS The National Map: National Boundaries Dataset, 3DEP Elevation Program, Geographic Names Information System, National Hydrography Dataset, National Land Cover Database, National Structures Dataset, and National Transportation Dataset; USGS Global Ecosystems; U.S. Census Bureau TIGER/Line data; USFS Road Data; Natural Earth Data; U.S. Department of State Humanitarian Information Unit; and NOAA National Centers for Environmental Information, U.S. Coastal Relief Model. Data refreshed May, 2020. **FIGURE 1** Ν SITE LOCUS MAP 300 0 75 150 **DANIEL'S MILL** Feet **98 East Main Street** Vernon, CT Weston (&) Sampson March 2021













APPENDIX A

ASBESTOS AND HAZARDOUS BUILDING MATERIALS ASSESSMENT DANIEL'S MILL 98 EAST MAIN STREET VERNON, CONNECTICUT

APPENDIX B

PHASE III DATA GAP INVESTIGATION REPORT FORMER DANIEL'S MILL 98 EAST MAIN STREET VERNON, CONNCECTICUT

(Electronic Copies)

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ENVIRONMENTAL ECOLOGICAL WATER CONSTRUCTION MANAGEMENT

655 Winding Brook Drive Suite 402 Glastonbury, CT 06033 860.286.8900 www.gza.com



September 1, 2015 File No. 05.0045441.03

Mr. John D. Ward, Town Administrator Memorial Building 14 Park Place, 3rd Floor Vernon, CT 06066

 Re: Asbestos and Hazardous Building Materials Assessment Daniel's Mill
 98 East Main Street Vernon, Connecticut, 06066

Dear Mr. Ward:

This report presents the results of a pre-demolition asbestos-containing materials (ACM) and hazardous building materials (HBMs) assessment conducted by GZA GeoEnvironmental, Inc. (GZA) for The Town of Vernon (the Client) at Daniel's Mill located at 98 East Main Street in Vernon, Connecticut (the Site). GZA's assessment work was conducted on July 10 and 23, 2015.

This report has been prepared in accordance with the Limitations provided in Appendix A, and is subject to modification if subsequent information is developed or identified by GZA or any other party. Authorization to proceed with the assessment of the building was granted in accordance with our change order dated June 30, 2015.

OBJECTIVE

The objective of the ACM and HBM Survey is to conduct a limited assessment of the Site building materials for presence of asbestos containing materials (ACM), polychlorinated biphenyl (PCB) containing materials, lead based paint, mercury, and other hazardous materials. GZA's evaluation did not include an assessment of roof systems, rooftop structures, nor below-grade asbestos-cement water/sewer piping, steam piping, or exterior foundation wall damp-proofing which may be present at the Site.

SCOPE OF SERVICES

GZA's evaluation of the Site building was completed in general accordance with United States Environmental Protection Agency (USEPA) and United States Occupational Safety and Health Administration (OSHA) methods, the State of Connecticut, and GZA's proposal for services.



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GZA's scope of services consisted of the following activities:

- A walkthrough and visual inspection of accessible building areas by a USEPA-accredited and Connecticut-licensed asbestos inspector to locate, estimate, sample, and assess those materials suspected to contain asbestos;
- Representative bulk sampling of each homogeneous area of suspect asbestos materials in sufficient numbers to comply with USEPA criteria. Analysis of the asbestos bulk samples at a Connecticut-licensed laboratory using polarized light microscopy with dispersion staining (PLM/DS), and visual estimation of resulting asbestos concentrations.
- Portable x-ray fluorescence (XRF) screening of painted surfaces for lead-based paint screening and subsequent paint chip laboratory testing.
- A visual evaluation of the Site building to identify other hazardous or potentially hazardous building materials, such as mercury-containing switches, fluorescent lamps, ballasts potentially containing polychlorinated biphenyls (PCBs) or diethyl-hexyl phthalate (DEHP), chlorofluorocarbons (CFCs), batteries, containerized wastes and other items;
- Representative sampling/screening of building caulk and concrete floors for PCBs; and,
- Preparation of this report of our findings.

This report presents summary of the work completed; laboratory analytical results, a description of ACMs and HBMs identified, locations of samples collected and estimated quantities of ACMs and HBMs.

FACILITY DESCRIPTION

Figure 1 shows the Site building on a U.S. G.S. topographic map. The Site consists of an approximate 1-acre irregularly-shaped parcel of land that is improved with a six-story (including basement and attic) historical mill building built in 1855. The building footprint measures approximately 9,043 square-feet. There is a loading dock on the western side of the building. The Site was historically used for but not limited to textile manufacturing, fire retardant paints and mastic manufacturing, and insecticide manufacturing.



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PROCEDURES

SURVEY TEAM MEMBERS AND LABORATORIES

The asbestos and hazardous materials evaluation was conducted on July 10 and 23, 2015 by John R. Pilling and Anthony Trani. Mr. Pilling is a Connecticut-licensed (AS000060) and United States Environmental Protection Agency (USEPA)-accredited Asbestos Inspector.

Suspect asbestos bulk samples collected during the evaluation were analyzed using Polarized Light Microscopy (PLM) by AEC Laboratories, LLC (AEC) of Weymouth, MA. AEC is certified (PH-0124) for asbestos bulk sample analysis by the State of Connecticut. Samples were analyzed for asbestos content using EPA Method 600/R-93/116: "Method for the Determination of Asbestos in Bulk Building Samples." The visual estimation technique was used to quantify all reported asbestos concentrations, unless otherwise noted. A copy of the AEC analytical report is provided in Appendix B.

XRF screening of painted surfaces for lead-based paint was performed by Hygenix, Inc. of Stamford, Connecticut. Laboratory testing of paint chips for leachable lead was performed by Schneider Laboratories Global, Inc., of Richmond, Virginia.

DEFINITION OF KEY ASBESTOS INSPECTION TERMS

Given the specific purposes and objectives of this inspection, the following USEPA definitions were used for the indicated terms:

- 1. Suspect/Non-Suspect ACM: Suspect ACM includes installed building materials that were pre-formed (i.e., manufactured off-site) or were prepared and installed on the site and are known to potentially contain asbestos. Suspect ACMs include materials such as thermal system insulation, soundproofing material, wall materials, floor tiles and mastic, roofing components, and numerous other materials. For the purposes of this inspection, the following materials were considered non-suspect and were not assessed or sampled if observed:
 - Glass
 - Wood or Wood-Composite Materials
 - Rubber or Synthetic Foam
 - Pink or Yellow Fiberglass Insulation on Pipes, Ducts, or Others
- Plastics
- Cinder Block
- Metal
- Ceramic Tiles
- Concrete
- 2. Homogeneous Materials Applications or Areas: Suspect materials that serve the same function or purpose (e.g., floor or ceiling tiles), have similar color and texture, and are likely to have been installed at or near the same time.


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- 3. Friable Materials: Materials that may be easily reduced to a powder by applying hand pressure (e.g., sprayed fireproofing as opposed to a non-friable material such as vinyl floor tile).
- 4. Inaccessible Building Areas: Building areas, systems, structural components, or surfaces which could not be observed because it was unsafe or impractical to demolish, disassemble, or remove systems or coverings, or because a person could not physically enter or observe the area or component (e.g., tanks or other vessels, permit-required confined spaces, etc.).
- 5. Confirmed Asbestos-Containing Materials: A material where at least one of the collected bulk samples thereof has an asbestos concentration of 1 percent or more. According to USEPA/AHERA criteria, all bulk samples of a homogeneous area of suspect ACM must be found to contain less than 1 percent asbestos to conclude that the material is not regulated as ACM by USEPA under the asbestos NESHAP regulation.

ASBESTOS SURVEY METHODOLOGY

Procedures for locating and identifying ACMs were based on guidelines published by the USEPA. An initial walkthrough survey of the Building was conducted to acquaint the inspector with the work areas and to assess the types, locations, and quantities of suspect materials both inside and outside of the structures. A more extensive survey was then conducted, at which time ventilation equipment, and pipes were visually evaluated for the presence of thermal system insulation (TSI) such as corrugated paper, fibrous chalky mixtures, or plaster-like coatings. Walls, ceilings, floor decking, and beams were assessed for the presence of suspect surface coatings that may have been applied for fireproofing, acoustical, waterproofing, or thermal insulation purposes. An assessment of suspect miscellaneous ACMs was conducted for materials such as asbestos-cement panels, flooring materials, roofing materials, window and door caulking and glazing compounds, and electrical conduits. GZA's scope of work did not include evaluating the possible presence of subsurface damp-proofing (unless exposed) on exterior foundation walls, underground asbestos-cement water/sewer piping, or underground insulated steam piping.

INACCESSIBLE BUILDING AREAS

Although GZA's intent was to conduct a thorough survey of the building, we cannot guarantee that all asbestos or potentially hazardous materials within the surveyed areas have been identified. This is due to ACMs having frequently been used in areas where detection is difficult until renovation, demolition, and/or asbestos abatement work begins and allows access to these remote areas. Where access to portions of the Site was unavailable or limited, GZA has provided an opinion as to the likely presence of hazardous



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materials consistent with our observations and the information available. Should additional ACMs be identified, these materials must be removed by a Connecticut-licensed asbestos abatement contractor.

ASBESTOS BULK SAMPLING PROTOCOL

The number of asbestos bulk samples collected depended on the type of identified suspect material. According to the USEPA/AHERA regulation, materials may be classified as surfacing (i.e., applied to a surface), thermal (i.e., providing thermal insulation), or miscellaneous (e.g., floor tiles).

The number of samples required increases as the potential for either a non-uniform mixture or poor asbestos distribution in the material increases. The following chart summarizes the sampling protocol deemed appropriate by GZA during this inspection:

Type of Suspect Material	Minimum Sampling Criteria			
Surfacing	Statistically random criteria (minimum of 3 samples; maximum of 7 samples per each homogeneous material)			
Thermal	Minimum of 3 samples per homogeneous area of suspect material			
Miscellaneous	Minimum of 2 samples per homogeneous area of suspect material, sinc potential for non-uniform mixture is relatively low			

MINIMUM BULK SAMPLING CRITERIA

A total of 19 PLM bulk samples of suspect ACMs were collected. Samples were placed in airtight, self-sealing plastic bags. The sample bags were then wet wiped of visible debris, assigned an identification number, and shipped for laboratory analysis following chain-of-custody protocol.

ASBESTOS SURVEY RESULTS

Estimated quantities and locations of GZA's identified ACMs are summarized below. A comprehensive ACM inventory is attached in Appendix C - Table 1.

ASBESTOS-CONTAINING MATERIALS

GZA sampled building interior and exterior building materials/surfaces and submitted those samples to the laboratory for testing. GZA notes there is a history of producing paints and mastics at the Site and it is possible that dust from mastic manufacturing could contain asbestos. Since select surface materials (e.g., sheetrock, plaster, floor leveler, tile) were sampled and analyzed, the testing of these surfaces was an assessment of both the building



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material and dust that may have settled on the surface. None of the interior surfaces that were sampled were positive for asbestos and no discernable amounts of dust were observed at the Site. GZA's assessment and laboratory test results identified the following ACMs within the facility:

Building Exterior:

- 8-foot by 3-foot window glazing (grey granular window glazing) on the east side of the building
- 8-foot by 3-foot window glazing on south side of building
- 3-foot by 3-foot window glazing on south side of building
- 8-foot by 3-foot window glazing on west side of building
- 6-foot by 8-foot door glazing on west side of building
- 2-foot round window glazing on west side of building

LEAD-BASED PAINT SAMPLING AND RESULTS

A lead-based paint (LBP) field screening assessment was conducted on July 16, 2015 by Hygenix. A copy of the lead-based paint screening report prepared by Hygenix is attached in Appendix D. The screening assessment was performed with the use of an X-ray fluorescence (XRF) analyzer (Niton Model XLp300A) to provide a field indication of the presence of lead. The assessment included the testing of representative painted surfaces in selected interior and exterior areas of the Site building. Varying concentrations of lead were detected on the interior and exterior surfaces throughout the Site building.

The screening was performed using the guidelines published by the US Department of Housing and Urban Development (HUD) and Connecticut Department of Health Services (CDHS). Hygenix performed 502 readings by XRF. Prior to screening with the XRF, the instrument was calibrated by scanning a surface with a known lead concentration. Twelve of the readings were for calibration purposes and 490 of the readings were from building surfaces or debris.

Samples from the following building materials were observed to have paint on their surface and samples from these surfaces exceeded the HUD and CDHS lead in paint maximum acceptable level of 1.0 milligrams per square centimeter (mg/cm³):

Interior:

- Wood Ceilings
- Ceiling Wood Beams
- Window Components
- Perimeter Door Components



- Proactive by Design
- Metal Window Components
- Exterior Trim
- Wood Walls Attic (southern addition)
- Plaster 4th Floor workshop
- Baseboard 4th Floor workshop
- Plaster/Concrete Walls 4th Floor (eastern side)
- Wood Walls 4th Floor (eastern side)
- Trim 4th Floor (eastern side)
- Plaster/Concrete Walls 4th floor (southern addition)
- Baseboard 4th floor (southern addition)
- Plaster/Concrete Walls 3rd floor (lab facilities)
- Wood Walls 3rd Floor (eastern side)
- Baseboard 3rd floor (southern addition)
- Wood and Brick Walls 2nd Floor (eastern side)
- Wood Walls 2nd Floor (southern addition)
- Metal Pipes 2nd Floor (southern addition)
- Baseboard 2nd Floor (southern addition)
- Brick Walls 1st Floor (south of boiler room)
- Plaster/Concrete Walls (southern wall in shipping area)
- Plaster/Concrete Walls (southern wall of stairwell to basement)
- Piles Of Painted Wood Basement

Exterior:

- Window Components
- Door Components
- Exterior Trim

TOXICITY CHARACTERISTIC LEACHING PROCEDURE LEAD SAMPLING

Lead paint chip samples from the 5 most elevated XRF readings were additionally submitted to the laboratory for toxicity characteristic leaching procedure (TCLP) lead analysis. Samples were submitted to Schneider Laboratories Global, Inc. in Richmond, Virginia. TCLP results ranged from 0.508 mg/L to 126 mg/L. TCLP results were in exceedence of the EPA 5 mg/L criteria at 3 of the 5 locations as follows:

- Window wood composite (126 mg/L)
- Door wood and exterior trim composite (119 mg/L)
- Interior ceiling, beam, and column composite (61.8 mg/L)



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Paint from these materials would be classified as "hazardous waste" and require special handling and disposal if the lead-based paint was removed (stripped off its substrate) during future building renovations. However, if full building demolition is planned, it is recommended, and more appropriate, to conduct composite sampling that is representative of bulk building demolition debris for lead analysis. It is GZA's experience that bulk building demolition debris samples typically do not exhibit hazardous levels of lead; which would allow building demolition debris to be disposed of at a bulky waste landfill rather than a hazardous waste disposal facility.

HAZARDOUS BUILDING MATERIALS

GZA conducted observations of the facility to obtain information on the presence of hazardous materials that should be removed and disposed of prior to demolition. Hazardous materials observed include: mercury switches, fluorescent lamps (containing mercury), fluorescent lamp ballasts (which contain PCBs), and containerized wastes (paint).

GZA also performed a visual assessment of suspect PCB-containing items. Fluorescent light ballasts and equipment-related small capacitors, transformers, cables, and hydraulic oils, are typically suspected to contain PCBs.

FLUORESCENT LIGHTING

GZA performed a visual assessment of the fluorescent light fixtures inside the facility for the potential presence of polychlorinated biphenyls (PCB) or di (2-ethylhexyl) phthalate (DEHP)-containing ballasts. Numerous PCB/DEHP-containing light ballasts were observed throughout the building. Nearly all ballasts manufactured prior to 1979 contain PCBs. All ballasts manufactured after July 1, 1978, which do not contain PCBs, are required to be clearly marked "No PCBs". Ballasts without a "No PCBs" label are generally assumed to contain PCBs in concentrations greater than 50 parts per million.

Connecticut Department of Energy and Environmental Protection (CTDEEP) regulations prohibit the disposal of PCB-containing ballasts in landfills. These ballasts must be disposed of at an incineration/recycling facility. Approximately 25% of ballasts manufactured after 1979 contain DEHP, a regulated substance under the U.S. EPA Superfund regulations. DEHP-contaminated ballasts may be disposed of in the same manner as PCB-contaminated ballasts.

Mercury-containing fluorescent light tubes were observed throughout the facility. CTDEEP regulations prohibit the disposal of mercury-containing lighting in landfills due to their mercury content. We believe the best option for handling these is to re-use (when possible) or recycle the bulbs.



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ADDITIONAL POLY-CHLORINATED BI-PHENYLS

GZA also performed a visual assessment for other suspect PCB-containing items. As noted above, GZA observed light ballasts that likely contain PCBs. We also observed a door closer on the first floor that likely contains PCBs. In addition, caulking was observed around the three doors on the north side of the building facing East Main Street. Three representative samples of the caulk were collected and sent to Phoenix Laboratories in Manchester, Connecticut for PCB analysis. Caulk analytical results are provided on Table 3 in Appendix C. PCBs were detected in the three samples ranging from 1.7 to 4.3 mg/kg.

GZA's Phase II report (submitted separately to Client) indicates PCBs were detected in soils below the basement floor of the building at concentrations between 0.8 and 91 mg/kg. Also Dexsil field screening of basement level concrete floors indicated PCBs may be present in concrete at elevated levels. However, concrete can potentially interfere with Dexsil PCB screening and the positive readings for basement concrete floor samples (indicating the presence of PCBs in concrete at concentrations greater than 50 mg/kg) cannot be compared to regulatory criteria. Dexsil data should only be used as guidance for future testing of concrete floors using laboratory analytical methods to confirm PCB concentrations, if any. We note that Dexsil screening was performed rather than laboratory analysis of concrete so the results obtained would not trigger certain regulatory obligations that the Site owner would have to address.

OTHER REGULATED MATERIALS

GZA performed a visual assessment of additional suspect universal/hazardous materials at the facility.

Locations and estimated quantities of identified universal/hazardous materials are provided in the Hazardous Materials Inventory in Appendix C Table 2.

CONCLUSIONS AND RECOMMENDATIONS

Based on analytical results, field screening and GZA's observations asbestos, lead-based paint and PCB containing building materials are present. None of the interior surfaces that were sampled were positive for asbestos. Certain building components were found to have lead-based paint that exceeded the EPA 5 mg/L criteria for hazardous waste.

GZA has developed the following recommendations in regard to ACM and HBMs:

 Prior to renovation or demolition activities that will impact confirmed ACM at the Site, a Connecticut-licensed asbestos abatement contractor should be retained to remove the ACM.



Proactive by Design

- Prior to conducting demolition activities that will impact the identified building-related hazardous materials, and containerized wastes (paint) identified herein, retain a qualified contractor to properly characterize, remove and dispose of the identified hazardous building materials and containerized wastes (paint).
- PCBs were detected in caulk samples on the three doors on the north side of the building facing East Main Street. A qualified contractor should be utilized to ensure that these materials are properly managed and disposed of at a facility that is licensed to accept low level PCB waste.
- Varying concentrations of lead were detected on interior and exterior surfaces throughout the Site buildings during the survey. For several of these surfaces, the paint would be considered hazardous waste (based upon TCLP sampling). Also, any disturbance of lead-containing paint is subject to the OSHA *Lead in Construction Standard*, 29 CFR 1926.62. A qualified contractor should be utilized to ensure that these materials are properly managed and disposed of. We note that additional composite sampling of the building would likely yield results that would allow most building materials to be disposed of as non-hazardous demolition debris. Composite sampling of the building should be performed if demolition of the building (or large portions of the building) is planned.
- PCBs may be present in the basement concrete floor. Samples of the concrete floor should be collected and submitted to a laboratory for PCB analysis consistent with TSCA guidance.

Thank you for this opportunity to be of service to you. Please contact any of the undersigned with any questions you may have pertaining to the information in this report.

Very truly yours, GZA GEOENVIRONMENTAL, INC.

fames 7. Chitte

James T. Hutton, LEP Senior Project Manager

John R. Pilling Senior Consultant

Jorlon T Busema

Gordon Brookman, LEP Principal

Harry J Cluer

Gary J. Cluen, LEP Consultant/Reviewer



Attachments:Figure 1 – Site Plan
Appendix A – Limitations
Appendix B – AEC Asbestos Analytical Laboratory Reports and PCB Analytical
Reports
Appendix C – ACM Table, Hazardous Materials Inventory Tables, and PCB
Caulk Testing Summary Table
Appendix D – Limited Lead Based Screening Report for 98 East Main Street,
Rockville, CT by Hygenix, Inc. dated July 22, 2015

J:_45,000-45,499\45441 Amerbelle\45441-03.gtb\Haz Bldg Survey\Haz Bldg Mat Survey rpt 09-01-15 FINAL.docx

FIGURES



APPENDIX A LIMITATIONS

LIMITATIONS ASBESTOS/HAZARDOUS MATERIALS

- 1. GZA's asbestos/hazardous materials evaluation was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same geographical area, and GZA observed the degree of care and skill generally exercised by other consultants under similar circumstances and conditions. GZA's findings and conclusions must be considered not as scientific certainties, but rather as our professional opinion concerning the significance of the limited data gathered during the course of the asbestos/hazardous materials evaluation. No other warranty, expressed or implied, is made. Specifically, GZA does not and cannot represent that the Site contains no asbestos-containing materials, hazardous materials, or other latent conditions beyond those observed by GZA during its asbestos/hazardous materials evaluation.
- 2. This survey report, which presents our findings, is not to be used as a bid document/work plan, or in place of a work plan, for conducting asbestos abatement. When an asbestos abatement work plan is prepared, the State of Connecticut requires that the plan be prepared by an EPA-certified and Connecticut-licensed Asbestos Project Designer.
- 3. The observations described in this report were made under the conditions stated herein. The conclusions presented in the report were based solely upon the services described therein, and not on scientific tasks or procedures beyond the proposed Scope of Services.
- 4. The conclusions and recommendations contained in this report are based on limited environmental sampling and visual observations, and were arrived at in accordance with generally accepted standards of industrial hygiene practice. No other warranty, expressed or implied, is made.
- 5. Where sample analyses were conducted by an outside laboratory, GZA has relied upon the data provided, and has not conducted an independent evaluation of the reliability of these data.
- 6. The purpose of this report was to assess the physical characteristics of the subject Site with respect to the presence of the specified hazardous materials in the Site building. No specific attempt was made to check on the compliance by any party with federal, state, or local laws and regulations.
- 7. Observations were made of the Site as indicated within the report. While it was GZA's intent to conduct a thorough survey, it is important to note that we cannot guarantee that all asbestos or potentially hazardous materials within the surveyed area have been identified. ACMs have frequently been used in areas where detection is difficult until renovation, demolition, and/or asbestos abatement work begins and allows access to these remote areas. Where access to portions of the site was unavailable or limited, GZA has provided an opinion as to the likely presence of hazardous materials consistent with the information available.

8. Since GZA has no control over labor and material costs and design, the estimates of abatement costs have been made on the basis of prior experience and discussions with contractors. The actual costs for various items will depend on actual market conditions when the project is bid. GZA does not guarantee the accuracy of cost estimates to contractor's bids for abatement costs.

APPENDIX B AEC ASBESTOS ANALYTICAL LABORATORY REPORTS AND PCB ANALYTICAL REPORTS

SLO		Analysis R	eport 🤇	Schneider 2512 W. Cary St 804-353-6778 • 1	Laborate	Ories I, Virginia 5227) • F	Global, Inc • 23220-5117 Fax 804-359-1475
Customer: Address:	AEC La 814 Bro Weymo	aboratories (44 bad Street buth, MA_0218	406) 39		Order #:	13	35992
Attn: Project: └Location: └Number:	Daniels 98 Eas 13923	s Mill 05.00454 t Main Street	441.00		Received Analyzed Reported PO Number:	07/ 07/ 07/	17/15 17/15 17/15
Method:	EPA 600/R-	93/116 & 600	/M4-82-020		PLM Ana	alysis	
Sample ID	Collected	Cust. ID	Location	Asbestos I	Fibers		Other Materials
Layer 1: Gray, G	Glazing ranular	001A	Courtyard	2% CHRYS	OTILE	98%	NON FIBROUS MATERIAL
135992-002	07/10/15	001B	Courtyard				
Layer 1:	Glazing						
Not ana	lyzed due t	o positive sto	op instructions.				
Layer 1: Beige, E	Glazing Brittle	002A	Building Facing East	None Detec	cted	100%	NON FIBROUS MATERIAL
135992-004	07/10/15	002B	Building Facing East				
Layer 1: Beige, E	Glazing Brittle			None Detec	cted	100%	NON FIBROUS MATERIAL
135992-005	07/10/15	003A	Building Facing East				
Layer 1: Red/Gra	Caulking ıy, Rubbery			None Detec	cted	100%	NON FIBROUS MATERIAL
135992-006	07/10/15	003B	Building Facing East				
Layer 1: Red/Gra	Caulking ıy, Rubbery			None Detec	cted	100%	NON FIBROUS MATERIAL
135992-007	07/10/15	004A	1st Floor Interior				
Layer 1: White, F	Sheetrock ?owdery			None Detec	cted	15% 85%	CELLULOSE FIBER NON FIBROUS MATERIAL
135992-008	07/10/15	004B	1st Floor Interior				
Layer 1: White, F	Sheetrock Powdery			None Detec	cted	15% 85%	CELLULOSE FIBER NON FIBROUS MATERIAL

Method reporting limit is 1%. PLM analysis is based on Visual Estimation and NESHAP recommends that any asbestos content less than 10 percent be verified by PLM Point Count or TEM Analysis. This report must not be reproduced except in full with the approval of the laboratory. The test results reported relate only to the samples submitted.

.

Method:	EPA 600/R	-93/116 & 60	0/M4-82-020	PLM Analysis						
Sample ID	Collected	Cust. ID	Location	Asbestos Fibers		Other Materials				
135992-009	07/10/15	005A	1st Floor Stairwell							
Layer 1: Gray, Ha	Plaster ard			None Detected	100%	NON FIBROUS MATERIAL				
135992-010	07/10/15	005B	1st Floor Stairwell							
Layer 1: Gray, Ha	Plaster ard			None Detected	100%	NON FIBROUS MATERIAL				
135992-011	07/10/15	005C	1st Floor Stairwell							
Layer 1: Gray, Ha	Plaster ard			None Detected	100%	NON FIBROUS MATERIAL				
135992-012	07/10/15	006A	Hardwood Floor 1st Floor							
Layer 1: Gray, G	Floor Lev ranular	eler		None Detected	2% 98%	CELLULOSE FIBER NON FIBROUS MATERIAL				
135992-013	07/10/15	006B	Hardwood Floor 1st Floor							
Layer 1: Gray, G	Floor Lev ranular	eler		None Detected	3% 97%	CELLULOSE FIBER NON FIBROUS MATERIAL				
135992-014	07/10/15	007A	2nd Floor Bath							
Layer 1: Tan, Orț	Tile ganically Bo	ound		None Detected	100%	NON FIBROUS MATERIAL				
135992-015	07/10/15	007B	2nd Floor Bath							
Layer 1: Tan, Org	Tile ganically Bo	ound		None Detected	100%	NON FIBROUS MATERIAL				
135992-016	07/10/15	008A	2nd Floor Bath							
Layer 1: Tan, So	Mastic ft			None Detected	4% 96%	CELLULOSE FIBER NON FIBROUS MATERIAL				
135992-017	07/10/15	008B	2nd Floor Bath							
Layer 1: Tan, So	Mastic ft			None Detected	3% 97%	CELLULOSE FIBER NON FIBROUS MATERIAL				
135992-018	07/10/15	009A	2nd Floor							
Layer 1: Gray, G	Window (ranular	Slaze		None Detected	2% 95% 3%	CELLULOSE FIBER NON FIBROUS MATERIAL WOLLASTONITE				
135992-019	07/10/15	009B	2nd Floor							
Layer 1: Gray, G	Window (ranular	Glaze		None Detected	2% 95% 3%	CELLULOSE FIBER NON FIBROUS MATERIAL WOLLASTONITE				

Method reporting limit is 1%. PLM analysis is based on Visual Estimation and NESHAP recommends that any asbestos content less than 10 percent be verified by PLM Point Count or TEM Analysis. This report must not be reproduced except in full with the approval of the laboratory. The test results reported relate only to the samples submitted.

PLM Analysis

Sample ID Collected Cust. ID Location

Analyst: Wilson, John 135992-07/17/15 11:17 AM

3.

Asbestos Fibers

ali ono

Other Materials

Reviewed By: Ali Eltom Analyst

Method reporting limit is 1%. PLM analysis is based on Visual Estimation and NESHAP recommends that any asbestos content less than 10 percent be verified by PLM Point Count or TEM Analysis. This report must not be reproduced except in full with the approval of the laboratory. The test results reported relate only to the samples submitted.

AEC Lab	AS 814 Broad AS 814 Broad AS 814 Broad AS 814 Broad Phone: 781 781 Fax: 781 781	e (Required): CT BULK SAMPLE CHAIN	TEMChat Lead PCB AEC Laboratories ID:	17-594-5618 Special Instructions:	Pilling	SAMPLE DESCRIPTION 0	Exterior Glazing	DOOR GAUENEO	1 Sheotrat ab	lat Floor Leveler value Hallook	121' Tan Floor Trie	Tan Mastic Interior Window Celeze	135992			T	
: Date/Time: 7/ ve lis	GZA GeoEnvironmental. Inc. Phone. 78	249 Vanderbilt ave, Norwood, MA 02062 245 Mrtl 05, 0045441,00 98 East Main Street, Vernon, CT State	M R Positive Stop Cualitative Point Count NOB Prep	by Jehn Priling Verbal Results 61 e: 7-10-15 Cell #:	v): John Pilling Name: John F	IELD'ID. LOCATION	(A,B Countraid	2 A.B DUI WING FACING POST MAINSI	4 ÅB (St Fleer Tuterior	COMB Hardwood Floor -157 Fl	MAB Zud Floor Buth	SCAJE TRA W 24, BLOOK					



Wednesday, July 29, 2015

Attn: Mr James Hutton GZA GeoEnvironmental, Inc. 655 Winding Brook Drive Suite 402 Glastonbury, CT 06033

Project ID: DANIELLES MILL Sample ID#s: BJ62646 - BJ62648

This laboratory is in compliance with the NELAC requirements of procedures used except where indicated.

This report contains results for the parameters tested, under the sampling conditions described on the Chain Of Custody, as received by the laboratory.

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

A scanned version of the COC form accompanies the analytical report and is an exact duplicate of the original.

If you have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext. 200.

Sincerely yours,

XI.lle

Phyllis/Shiller Laboratory Director

NELAC - #NY11301 CT Lab Registration #PH-0618 MA Lab Registration #MA-CT-007 ME Lab Registration #CT-007 NH Lab Registration #213693-A,B NJ Lab Registration #CT-003 NY Lab Registration #11301 PA Lab Registration #68-03530 RI Lab Registration #63 VT Lab Registration #VT11301



Environmental Laboratories, Inc. 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045 Tel. (860) 645-1102 Fax (860) 645-0823

Custody Information

Collected by:

Received by:

Analysis	Report
----------	--------

July 29, 2015

FOR: Attn: Mr James Hutton GZA GeoEnvironmental, Inc. 655 Winding Brook Drive Suite 402 Glastonbury, CT 06033

Sample Information					
Matrix:	SOLID				
Location Code:	GZACTENG				
Rush Request:	Standard				
P.O.#:	45441.03				

	SOLID
on Code:	GZACTENG
Request:	Standard
	45441.03

Analyzed by: see "By" below Laboratory Data

AT

LK

SDG ID: GBJ62646 Phoenix ID: BJ62646

<u>Time</u>

11:32

15:55

<u>Date</u>

07/23/15

07/23/15

Project ID:	DANIELLES MILL
Client ID:	CAULK 1

		RL/					
Parameter	Result	PQL	Units	Dilution	Date/Time	Ву	Reference
Percent Solid	100	1	%		07/23/15		SW846-%Solid
Caulk Extraction for PCB	Completed				07/24/15	QQ/Z	SW3540C
PCB (Soxhlet SW3540C)							
PCB-1016	ND	530	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1221	ND	530	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1232	ND	530	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1242	ND	530	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1248	ND	530	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1254	1700	530	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1260	ND	530	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1262	ND	530	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1268	ND	530	ug/Kg	5	07/27/15	AW	SW8082A
QA/QC Surrogates							
% DCBP	111		%	5	07/27/15	AW	30 - 150 %
% TCMX	98		%	5	07/27/15	AW	30 - 150 %

Project ID:	DANIELLES MILL					Pho	penix	I.D.: BJ62646
Client ID:	CAULK 1							
			RL/					
Parameter	F	Result	PQL	Units	Dilution	Date/Time	Ву	Reference

RL/PQL=Reporting/Practical Quantitation Level ND=Not Detected BRL=Below Reporting Level

Comments:

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200. This report must not be reproduced except in full as defined by the attached chain of custody.

Phyllis Shiller, Laboratory Director July 29, 2015 Reviewed and Released by: Ethan Lee, Project Manager



Environmental Laboratories, Inc. 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045 Tel. (860) 645-1102 Fax (860) 645-0823

Analysis Report

July 29, 2015

FOR: Attn: Mr James Hutton GZA GeoEnvironmental, Inc. 655 Winding Brook Drive Suite 402 Glastonbury, CT 06033

see "By" below

AT

LK

Sample Information Matrix: SOLID

Maura.	JOLID
Location Code:	GZACTENG
Rush Request:	Standard
P.O.#:	45441.03

Laboratory Data

Custody Information

Collected by:

Received by:

Analyzed by:

_ . .

SDG ID: GBJ62646 Phoenix ID: BJ62647

Time

11:28

15:55

<u>Date</u>

07/23/15

07/23/15

Project ID:	DANIELLES MILL
Client ID:	CAULK 2

Parameter	Result	RL/ POI	Units	Dilution	Date/Time	Bv	Reference
	rtesuit		01110	Diración		By	
Percent Solid	100	1	%		07/23/15		SW846-%Solid
Caulk Extraction for PCB	Completed				07/24/15	QQ/Z	SW3540C
PCB (Soxhlet SW3540	<u>C)</u>						
PCB-1016	ND	440	ug/Kg	2	07/27/15	AW	SW8082A
PCB-1221	ND	440	ug/Kg	2	07/27/15	AW	SW8082A
PCB-1232	ND	440	ug/Kg	2	07/27/15	AW	SW8082A
PCB-1242	ND	440	ug/Kg	2	07/27/15	AW	SW8082A
PCB-1248	ND	440	ug/Kg	2	07/27/15	AW	SW8082A
PCB-1254	*	440	ug/Kg	2	07/27/15	AW	SW8082A
PCB-1260	*	440	ug/Kg	2	07/27/15	AW	SW8082A
PCB-1262	ND	440	ug/Kg	2	07/27/15	AW	SW8082A
PCB-1268	ND	440	ug/Kg	2	07/27/15	AW	SW8082A
Total PCBs	3100	440	ug/Kg	2	07/27/15	AW	SW8082A
QA/QC Surrogates							
% DCBP	95		%	2	07/27/15	AW	30 - 150 %
% TCMX	80		%	2	07/27/15	AW	30 - 150 %

Project ID: DANIELLES	MILL				Pł	noeni	x I.D.: BJ626	47
Client ID: CAULK 2								
		RL/						
Parameter	Result	PQL	Units	Dilution	Date/Time	Ву	Reference	

RL/PQL=Reporting/Practical Quantitation Level ND=Not Detected BRL=Below Reporting Level

Comments:

PCB Comment:

* For PCBs, as per section 11.9.3 of SW846 method 8082, when multiple Aroclor's of PCBs are present and the aroclor is no longer recognizable, quantitation may be performed by comparing the total area of the PCB pattern to that of the aroclor it mostly resembles. The PCB pattern did not resemble any of the standards, but most closely resembles a mixture of the Aroclors 1254 and 1260.

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

If there are any questions regarding this data, please call Phoenix Client Services at extension 200. This report must not be reproduced except in full as defined by the attached chain of custody.

Phyllis Shiller, Laboratory Director July 29, 2015 Reviewed and Released by: Ethan Lee, Project Manager



Environmental Laboratories, Inc. 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045 Tel. (860) 645-1102 Fax (860) 645-0823

Analysis	Report
----------	--------

July 29, 2015

FOR: Attn: Mr James Hutton GZA GeoEnvironmental, Inc. 655 Winding Brook Drive Suite 402 Glastonbury, CT 06033

see "By" below

AT

LΚ

Samp	el	nf	orm	ati	on

Matrix:	SOLID
Location Code:	GZACTENG
Rush Request:	Standard
P.O.#:	45441.03

La	bor	ato	rv	Da	ta
LU	NUI	au	I Y	Du	LU

Custody Information

Collected by:

Received by:

Analyzed by:

_ . .

SDG ID: GBJ62646 Phoenix ID: BJ62648

<u>Date</u>

07/23/15

07/23/15

Time

11:22

15:55

Project ID:	DANIELLES MILL
Client ID:	CAULK 3

_		RL/				_	- <i>i</i>
Parameter	Result	PQL	Units	Dilution	Date/Time	Ву	Reference
Percent Solid	100	1	%		07/23/15		SW846-%Solid
Caulk Extraction for PCB	Completed				07/24/15	NQ/Z	SW3540C
PCB (Soxhlet SW35400	2)						
PCB-1016	ND	810	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1221	ND	810	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1232	ND	810	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1242	ND	810	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1248	ND	810	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1254	*	810	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1260	3 8 5	810	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1262	ND	810	ug/Kg	5	07/27/15	AW	SW8082A
PCB-1268	ND	810	ug/Kg	5	07/27/15	AW	SW8082A
Total PCBs	4300	810	ug/Kg	5	07/27/15	AW	SW8082A
QA/QC Surrogates							
% DCBP	102		%	5	07/27/15	AW	30 - 150 %
% TCMX	91		%	5	07/27/15	AW	30 - 150 %

Project ID:	DANIELLES MILI	-				Ph	oenix	(I.D.: BJ6264	18
Client ID:	CAULK 3								
			RL/						
Parameter		Result	PQL	Units	Dilution	Date/Time	Ву	Reference	

RL/PQL=Reporting/Practical Quantitation Level ND=Not Detected BRL=Below Reporting Level

Comments:

PCB Comment:

* For PCBs, as per section 11.9.3 of SW846 method 8082, when multiple Aroclor's of PCBs are present and the aroclor is no longer recognizable, quantitation may be performed by comparing the total area of the PCB pattern to that of the aroclor it mostly resembles. The PCB pattern did not resemble any of the standards, but most closely resembles a mixture of the Aroclors 1254 and 1260.

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments,

If there are any questions regarding this data, please call Phoenix Client Services at extension 200. This report must not be reproduced except in full as defined by the attached chain of custody.

Phyllis Shiller, Laboratory Director July 29, 2015 Reviewed and Released by: Ethan Lee, Project Manager



Environmental Laboratories, Inc. 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045 Tel. (860) 645-1102 Fax (860) 645-0823

QA/QC Report

July 29, 2015

QA/QC Data

SDG I.D.: GBJ62646

		RIK	1.00	1000	1.00	MC	MCD	MC	% Baa	% 000
Parameter	Blank	RL	%	%	RPD	%	%	RPD	Limits	Limits
QA/QC Batch 314933 (ug/Kg), Q	C Sam	ple No: BJ62998 10X (BJ6264	6, BJ626	647)						
Polychlorinated Biphenyls	- Soli	<u>d</u>								
PCB-1016	ND	170	82	77	6.3	104	106	1.9	40 - 140	30
PCB-1221	ND	170							40 - 140	30
PCB-1232	ND	170							40 - 140	30
PCB-1242	ND	170							40 - 140	30
PCB-1248	ND	170							40 - 140	30
PCB-1254	ND	170							40 - 140	30
PCB-1260	ND	170	89	85	4.6	92	93	1.1	40 - 140	30
PCB-1262	ND	170							40 - 140	30
PCB-1268	ND	170							40 - 140	30
% DCBP (Surrogate Rec)	102	%	98	100	2.0	97	101	4.0	30 - 150	30
% TCMX (Surrogate Rec)	80	%	74	72	2.7	78	83	6.2	30 - 150	30
QA/QC Batch 314954 (ug/Kg), Q	C Sam	ple No: BJ63143 10X (BJ6264	8)							
Polychlorinated Biphenyls	- Soli	<u>d</u>								
PCB-1016	ND	170	97	93	4.2	94	97	3.1	40 - 140	30
PCB-1221	ND	170							40 - 140	30
PCB-1232	ND	170							40 - 140	30
PCB-1242	ND	170							40 - 140	30
PCB-1248	ND	170							40 - 140	30
PCB-1254	ND	170							40 - 140	30
PCB-1260	ND	170	103	100	3.0	116	121	4.2	40 - 140	30
PCB-1262	ND	170							40 - 140	30
PCB-1268	ND	170							40 - 140	30
% DCBP (Surrogate Rec)	101	%	105	103	1.9	96	97	1.0	30 - 150	30
% TCMX (Surrogate Rec)	93	%	93	89	4.4	90	93	3.3	30 - 150	30

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

RPD - Relative Percent Difference

LCS - Laboratory Control Sample

LCSD - Laboratory Control Sample Duplicate

MS - Matrix Spike

MS Dup - Matrix Spike Duplicate

NC - No Criteria

Intf - Interference

Phyllis Shiller, Laboratory Director July 29, 2015

Wednesday,	July 29, 2015		Sample Criteria Exceedences Reno	t				age 1 of 1
Criteria:	None		GBJ62646 - GZACTENG	-				
State:	<u>.</u>						RL	Analysis
SampNo	Acode	Phoenix Analyte	Criteria	Result	R	Criteria	Criteria	Units
*** No Data	to Display ***					10 10		

Phoenix Laboratories does not assume responsibility for the data contained in this report. It is provided as an additional tool to identify requested criteria exceedences. All efforts are made to ensure the accuracy of the data (obtained from appropriate agencies). A lack of exceedence information does not necessarily suggest conformance to the criteria. It is ultimately the site professional's responsibility to determine appropriate compliance.

Reasonable Confidence Protocol Laboratory Analysis QA/QC Certification Form

Laboratory Name: Phoenix Environmental Labs, Inc. Client: GZA	GeoEnvironmental, Inc.						
Project Location: DANIELLES MILL Project Number:							
Laboratory Sample ID(s): BJ62646, BJ62647, BJ62648							
Sampling Date(s): 7/23/2015							
RCP Methods Used:							
☐ 1311/1312 6010 7000 7196 7470/7471 8081	EPH TO15						
✓ 8082 8151 8260 8270 ETPH 9010/9012	VPH						
1. For each analytical method referenced in this laboratory report package, were all specified QA/QC performance criteria followed, including the requirement to explain any criteria falling outside of acceptable guidelines, as specified in the CT DEP method-specific Reasonable Confidence Protocol documents?	I Yes □ No						
1a. Were the method specified preservation and holding time requirements met?	☑ Yes □ No						
1b. EPH and VPH methods only: Was the VPH or EPH method conducted without significant modifications (see section 11.3 of respective RCP methods)	🗆 Yes 🗌 No 🗹 NA						
2. Were all samples received by the laboratory in a condition consistent with that described on the associated Chain-of-Custody document(s)?	☑ Yes □ No						
3. Were samples received at an appropriate temperature (< 6 Degrees C)?	□Yes ☑No □NA						
4. Were all QA/QC performance criteria specified in the Reasonable Confidence Protocol documents achieved?	✓ Yes □ No						
5a. Were reporting limits specified or referenced on the chain-of-custody?	🗆 Yes 🗹 No						
5b. Were these reporting limits met?	🗆 Yes 🗌 No 🗹 NA						
6. For each analytical method referenced in this laboratory report package, were results reported for all constituents identified in the method-specific analyte lists presented in the Reasonable Confidence Protocol documents?	✓ Yes □ No □ NA						
7. Are project-specific matrix spikes and laboratory duplicates included in the data set?	🗆 Yes 🗹 No 🗔 NA						

Note: For all questions to which the response was "No" (with the exception of question #5a, #7), additional information must be provided in an attached narrative. If the answer to question #1, #1A or 1B is "No", the data package does not meet the requirements for "Reasonable Confidence".

I, the undersigned, attest under the pains and penalties of perjury that, to the best of my knowledge and belief and based upon my personal inquiry of those responsible for providing the information contained in this analytical report, such information is accurate and complete.

Authorized Signature:

Ethan See

Date: Wednesday, July 29, 2015

Printed Name: Ethan Lee

Position: Project Manager

Nov 2007





Environmental Laboratories, Inc. 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045 Tel. (860) 645-1102 Fax (860) 645-0823

RCP Certification Report

July 29, 2015

SDG I.D.: GBJ62646

Temperature above 6C:

The samples were received in a cooler with ice packs. The samples were delivered to the Laboratory within a short period of time after sample collection. Therefore no bias is suspected.

PCB Narration

Were all QA/QC performance criteria specified in the Reasonable Confidence Protocol documents achieved? Yes.

Instrument: <u>Au-ecd1 07/27/15-1 (BJ62647, BJ62648)</u>

The initial calibration (PC713AI) RSD for the compound list was less than 20% except for the following compounds: None.

The initial calibration (PC702BI) RSD for the compound list was less than 20% except for the following compounds: None.

The initial calibration (PC713BI) RSD for the compound list was less than 20% except for the following compounds: None.

The continuing calibration %D for the compound list was less than 15% except for the following compounds: None.

Printed Name	Adam Werner
Position:	Chemist
Date:	7/27/2015

Instrument: <u>Au-ecd48 07/27/15-1 (BJ62646)</u>

The initial calibration (PC622AI) RSD for the compound list was less than 20% except for the following compounds: None.

The initial calibration (PC622BI) RSD for the compound list was less than 20% except for the following compounds: None.

The continuing calibration %D for the compound list was less than 15% except for the following compounds: None.

Printed Name	Adam Werner		
Position:	Chemist		
Date:	7/27/2015		





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RCP Certification Report

July 29, 2015

SDG I.D.: GBJ62646

QC (Batch Specific)

------ Sample No: BJ62998, QA/QC Batch: 314933 ------

All LCS recoveries were within 40 - 140 with the following exceptions: None.

All LCSD recoveries were within 40 - 140 with the following exceptions: None.

All LCS/LCSD RPDs were less than 30% with the following exceptions: None.

------ Sample No: BJ63143, QA/QC Batch: 314954 ------

All LCS recoveries were within 40 - 140 with the following exceptions: None.

All LCSD recoveries were within 40 - 140 with the following exceptions: None.

All LCS/LCSD RPDs were less than 30% with the following exceptions: None.

Temperature Narration

The samples were received at 11C with cooling initiated. (Note acceptance criteria is above freezing up to 6°C)

	Eax: Phone: <u>860-878-3/37</u> Email: Arct. A the C 524. Con	Project P.O: 45441. 07	This section MUST be completed with Bottle Quantities.		2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2 2				t MA Data Format ction CW-1 Excel sction CW-1 Excel Sction GW-2 GIS/Key ity GW-3 EQUIS	ity S-1 Other ity S-2 Data Package S-3 Full Data Package* MWRA SSMART Phoenix Std Report Other Other Collected: C7 · SurcHARGE APPI IFS
AIN OF CLISTODY BECODE	dle Turnpike, P.O. Box 370, Manchester, CT 06040 fro@phoenixlabs.com Fax (860) 645-0823 Client Services (860) 645-8726	Project: DANZELIEJ MILL HOPEN	Report to: JAME HUNDAN Invoice to:	Analysis Request					Time: Time: RI Alaction Critect Construction Alaction Critect Construction Alaction Critect Construction Construction Critect Construction	umaround: 1 Day* 1 Day* CB Mobil 2 Days* C Residentia 3 Days* I/C DEC Standard Vance Other Stante where samples were
J.	FHOE/VIX 587 East Mid Snvironmental Laboratories, Inc.	Customer: GZA	Address: ESS WINDING BROOK DR., SWITE 402 GLATTONBURY, CT	Client Sample - Information - Identification Sampler's On Hay Tan Date: フ/33/JC Signature On Harrix Code: Matrix Code: DW=Drinking Water GW=Ground Water SW=Surface Water Ww=Waster Water SE=Sediment SL=Sludge S=Soil SD=Solid W=Wipe OIL=Oil B=Bulk L=Liquid	HOENIX USE ONLY Customer Sample Sample Date Time SAMPLE # Identification Matrix Sampled Sampled	13647 CAULIC-2 1128	LAGLYS CAULK-3 U U IIAN		Relinquished by: Accepted by: Dirylon Signi Accepted by:	T

APPENDIX C ACM TABLE, HAZARDOUS MATERIALS INVENTORY TABLES, AND PCB CAULK TESTING SUMMARY TABLE

Table 1 Asbestos Containing Materials Inventory former Daniel's Mill 98 East Main Street Vernon, Connecticut

Material	Quantity	Hazard	Location	Asbestos Status
Floor Tile & Mastic	121 square feet	Asbestos	2 nd Floor Bathroom	Negative
8-foot by 3-foot window glazing	32 windows	Asbestos	Exterior-South Side	Assumed Positive
3-foot by 3-foot window glazing	4 windows	Asbestos	Exterior-South Side	Assumed Positive
Double door with glazing	2 double doors	Asbestos	Exterior	Negative
8-foot by 3-foot window glazing	48 windows	Asbestos	Exterior-East Side	2% chrysotile - Positive
8-foot by 3-foot window glazing	-	Asbestos	Exterior-North Side	Negative
8-foot by 3-foot window glazing	16	Asbestos	Exterior-West Side	Assumed Positive
6-foot by 8-foot door glazing	5	Asbestos	Exterior-West Side	Assumed Positive
2-foot round window glazing	2	Asbestos	Exterior-West Side	Assumed Positive

Table 2 Hazardous Materials Inventory former Daniel's Mill 98 East Main Street Vernon, Connecticut

Material	Quantity	Hazard	Location	
4' Fluorescent Light Bulbs	4 bulbs	Mercury	Attic	
8' Fluorescent Light Bulbs	200 bulbs	Mercury	4 th Floor	
8' Fluorescent Light Bulbs	100 bulbs	Mercury	3 rd Floor	
4' Fluorescent Light Bulbs	6 bulbs	Mercury	2 nd Floor	
4' Fluorescent Light Bulbs	2 bulbs	Mercury	2 nd Floor	
4' Fluorescent Light Ballasts	2 ballasts	PCB/DEHP	2 nd Floor	
Exit Sign Batteries	2 batteries	Lead-acid	2 nd Floor	
Refridgerator	1 unit	CFC	2 nd Floor	
Paint	2 gallons	-	2 nd Floor	
Fluorescent Light Bulb	1 bulb	Mercury	2 nd Floor	
Compact Fluorescent Light Bulbs	6 bulbs	Mercury	1 st Floor	
8' Fluorescent Light Bulbs	3 bulbs	Mercury	1 st Floor	
8' Fluorescent Light Ballasts	3 ballasts	PCB/DEHP	1 st Floor	
Exit Sign Batteries	1 batteries	Lead-acid	1 st Floor	
Door Closer	1 closer	PCBs/Oils	1 st Floor	
4' Fluorescent Light Bulbs	3 bulbs	Mercury	Basement	
4' Fluorescent Light Ballasts	3 ballasts	PCB/DEHP	Basement	

Table 3 Summary of Caulk Analytical Data former Daniel's Mill 98 East Main Street Vernon, Connecticut

Sample ID	Caulk-1	Caulk-2	Caulk-3				
Date	7/23/2015	7/23/2015	7/23/2015				
Polychlorinated Biphenyls (PCBs) (mg/kg)							
Aroclor 1016	ND <0.53	ND<0.44	ND<0.81				
Aroclor 1221	ND <0.53	ND<0.44	ND<0.81				
Aroclor 1232	ND <0.53	ND<0.44	ND<0.81				
Aroclor 1242	ND <0.53	ND<0.44	ND<0.81				
Aroclor 1248	ND <0.53	ND<0.44	ND<0.81				
Aroclor 1254	1.700	*	*				
Aroclor 1260	ND <0.53	*	*				
Aroclor 1262	ND <0.53	ND<0.44	ND<0.81				
Aroclor 1268	ND<0.53	ND<0.44	ND<0.81				
Total PCBs	1.7	3.1	4.3				

Notes:

1. An "*" indicates the specific aroclor could not be identified.

2. "ND" = Criteria not detected

APPENDIX D LIMITED LEAD BASED SCREENING REPORT FOR 98 EAST MAIN STREET, ROCKVILLE, CT BY HYGENIX, INC. DATED JULY 22, 2015
LIMITED LEAD-BASED PAINT SCREENING

INSPECTION SITE:	98 East Main Street Rockville, CT
CLIENT:	GZA GeoEnvironmental, Inc. 655 Winding Brook Road, Suite 402 Glastonbury, CT 06033 Attn.: James Hutton
INSPECTOR:	Ryan Ebenhack (CT Lead Inspector - 002167)
INSPECTION DATE:	July 16, 2015
SITE INFORMATION:	
Type of Buildings: Type of Survey: # of Samples:	Commercial Lead Screening 502

BACKGROUND

Ryan Ebenhack performed the limited lead-based paint screening, for the above mentioned building, on July 16, 2015. The purpose of the inspection is to give a general idea as to the presence and location of lead-based paint (LBP) on surfaces of the building that will be disturbed during upcoming renovation or demolition activities. The lead content of the paint on building components was analyzed at the site using an X-Ray Fluorescence Analyzer (Niton XLp 300A).

INTRODUCTION

Paint containing high levels of lead has been widely used on houses, apartments and commercial buildings. Although lead-based paint was phased out during the 1970's, many buildings constructed before this time still contain layers of the older lead-based paint.

Exposure to lead-based paint may cause a variety of adverse health effects. Children are particularly susceptible to the effects of lead exposure and may suffer subtle learning deficiencies from ingestion of lead paint chips and/or inhalation of lead dust. Extensive regulations have been developed by State and Federal agencies to address the problem of lead exposure in homes, in child day care facilities, in the workplace, and in the environment.

XRF LEAD-BASED PAINT SCREENING SURVEY (see Attachment 1)

The lead content of paint was tested using an X-Ray Fluorescence Analyzer (Niton Model XLp 300A).

The Niton analyzer is a screening device capable of measuring the lead content of surfaces covered with multiple layers of paint. The Niton XLp 300A readings are not affected by the composition of the substrate materials. Each time the Niton XLp 300A is turned on, an electronic calibration is automatically performed. Prior to testing and periodically throughout the survey, the calibration of the analyzer is checked on a surface with a known lead concentration.

Protocols for the assessment of lead in paint are outlined in guidelines published by the US Department of Housing and Urban Development (HUD) and in regulations enforced by Connecticut Department of Health Services (CT-DOHS). In accordance with these protocols, the results of testing with the Niton XLp 300A may be interpreted as follows:

Toxic Levels of Lead = Readings greater than or equal to 1.0 mg/cm2*

*Note: OSHA does not currently define a threshold level of lead in paint, which may cause exposure above the action level (AL) and/or permissible exposure limit (PEL). OSHA requires exposure monitoring when lead is identified in paint at any amount to determine lead dust levels.

RESULTS

Of the 502 collected at the site, 12 of them were for calibrating the machine and 143 of the surfaces were identified as lead based paint. The following if a summary of the items identified as lead containing:

- Interior wood ceilings
- Interior ceiling wood beams
- Interior wood columns
- Interior & Exterior window components
- Interior perimter & Exterior door components
- Metal Window Components
- Exterior trim
- Area 3 wood walls
- Area 4 plaster
- Area 4 baseboard
- Area 5 plaster / concrete walls
- Area 5 wood walls
- Area 5 trim
- Area 6 baseboard
- Area 6 plaster / concrete walls (Side C)
- Area 8 plaster / concrete walls
- Area 10 wood walls
- Area 11 baseboard

- Area 15 wood walls
- Area 15 brick walls
- Area 16 wood walls
- Area 16 metal pipes
- Area 16 baseboard
- Area 18 brick walls
- Area 19 plaster / concrete walls
- Area 23 plaster / concrete walls (Side C)
- Basement piles of old painted wood

The results of this survey are shown on the attached XRF data sheets

LIMITATIONS

HYGENIX, Inc. has performed its services, within the limits prescribed by our clients, with the usual thoroughness and competence of the industrial hygiene profession.

The findings in this report are based upon observations and information available to the inspector during the time of the rendering of the services as described in this report and are based on procedures currently required by applicable laws, regulations and ordinances. HYGENIX cannot be responsible for conditions or materials the inspector did not observe due to lack of access or was not otherwise reasonably observable. The conclusions in this report are professional opinions based solely upon these findings. The findings and conclusions are intended exclusively for the purpose outlined herein within the scope of work and at the site location and project indicated.

This report is for the sole use of the client. The scope of work performed in execution of this inspection may not be appropriate to satisfy the needs of other users and any reuse of this document or the findings, conclusions, or recommendations presented herein is at the sole risk of said user.

Inspector

Date July 22, 2015













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87	2015-07-16 08:22									2000 C		1.63 ± 0.00	cps	
88	2015-07-16 08:55	98 e main				calibrate				INTACT	Negative	0.00 ± 0.02	:mg / cm ^2	
68	2015-07-16 08:55	98 e main				calibrate				INTACT	Positive	3.80 ± 2.50	mg / cm ^2	
90	2015-07-16 08:55	98 e main				calibrate				INTACT	Null	1.00 ± 0.10	mg / cm ^2	
91	2015-07-16 08:58	98 e main	sixth		A	WALL			WOOD	CRACKED	Negative	0.02 ± 0.04	mg / cm ^2	
92	2015-07-16 08:58	98 e main	sixth		A	WALL			brick	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
56	2015-07-16 08:59	98 e main	sixth		C	WALL			brick	CRACKED	Negative	0.01 ± 0.02	mg / cm ^2	
94	2015-07-16 08:59	98 e main	sixth		Ū	WALL			brick	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
56	2015-07-16 08:59	98 e main	sixth		D	WALL			WOOD	CRACKED	Negative	0.25 ± 0.25	mg / cm ^2	
96	2015-07-16 09:00	98 e main	sixth		D	CEILING			CONCRETE	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
97	2015-07-16 09:00	98 e main	sixth		A	CEILING			WOOD	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
86	2015-07-16 09:01	98 e main	sixth			DOOR			WOOD	CRACKED	Negative	0.50 ± 0.50	mg / cm ^2	
66	2015-07-16 09:01	98 e main	sixth			DOOR	jam		WOOD	CRACKED	Negative	0.17 ± 0.14	mg / cm ^2	
100	2015-07-16 09:01	98 e main	sixth			DOOR	lintel		Metal	CRACKED	Negative	0.80 ± 0.20	ing / cm ^2	
101	2015-07-16 09:02	98 e main	sixth		в	WINDOW	case		WOOD	CRACKED	Null	0.24 ± 0.41	mg / cm ^2	
102	2015-07-16 09:02	98 e main	sixth		в	WINDOW	lintel		METAL	CRACKED	Positive	1.20 ± 0.20	mg / cm ^2	
103	2015-07-16 09:03	98 c main	sixth		в	FLOOR			CONCRETE	CRACKED	Null	0.60 ± 0.10	mg / cm 2	
104	2015-07-16 09:04	98 e main	sixth		в	stair	tread		WOOD	CRACKED	Negative	0.03 ± 0.07	mg / cm ^2	
105	2015-07-16 09:04	98 e main	sixth		в	stair	stringer		WOOD	CRACKED	Negative	0.13 ± 0.87	mg / cm ^2	
106	2015-07-16 09:04	98 e main	sixth		B	stair	rail		WOOD	CRACKED	Negative	0.22 ± 0.16	mg / cm ^2	
107	2015-07-16 09:07	98 e main	FIFTH	-	A	CEILING			WOOD	CRACKED	Negative	0.01 ± 0.03	mg / cm 2	
108	2015-07-16 09:07	98 e main	FIFTH	-	D	WALL			PLASTER	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
109	2015-07-16 09:07	98 e main	FIFTH	4	D	WINDOW	case		WOOD	CRACKED	Positive	19.80 ± 16.70	mg/cm^2	
110	2015-07-16 09:07	98 e main	FIFTH	1	D	WINDOW	stool		WOOD	CRACKED	Negative	0.50 ± 0.30	mg / cm ^2	
111	2015-07-16 09:08	98 e main	FIFTH	÷	D	WINDOW	sash		WOOD	CRACKED	Null	0.50 ± 0.40	:mg / cm ^2	
112	2015-07-16 09:08	98 e main	FIFTH	1	D	FLOOR			WOOD	CRACKED	Negative	0.06 ± 0.14	mg / cm ^2	
113	2015-07-16 09:08	98 e main	FIFTH	-	D	beam			WOOD	CRACKED	Positive	10.50 ± 9.20	mg / cm ^2	
114	2015-07-16 09:09	98 e main	FIFTH		C	beam			WOOD	CRACKED	Positive	10.60 ± 8.20	mg/cm ^2	
115	2015-07-16 09:09	98 e main	FIFTH))	С	CEILING			WOOD	CRACKED	Null	0.02 ± 0.16	mg / cm ^2	
116	2015-07-16 09:10	98 e main	FIFTH	+	С	FLOOR			WOOD	CRACKED	Negative	:0.07 ± 0.10	mg / cm ^2	
117	2015-07-16 09:10	98 e main	EIFTH	-	в	DOOR			METAL	CRACKED	Negative	0.03 ± 0.05	mg / cm ^2	
811	2015-07-16 09:10	98 e main	FIFTH	1	C	DOOR			METAL	CRACKED	Negative	0.12 ± 0.30	mg / cm ^2	
119	2015-07-16 09:10	98 e main	FIFTH	l	Ω	DOOR	Case		METAL	CRACKED	Negative	0.40 ± 0.30	mg / cm ^2	
120	2015-07-16 09:11	98 e main	FIFTH	1	С	DOOR	lintel		METAL	CRACKED	Negative	0.01 ± 0.07	mg / cm ^2	
121	2015-07-16 09:12	98 e main	FIFTH	2	D	WALL			WOOD	CRACKED	Null	0.80 ± 0.20	mg / cm ^2	
122	2015-07-16 09:12	98 e main	FIFTH	2	D	WINDOW			WOOD	CRACKED	Negative	0.01 ± 0.06	mg / cm ^2	
123	2015-07-16 09:12	98 e main	FIFTH	2	D	beam			WOOD	CRACKED	Positive	19.70 ± 16.50	mg / cm ^2	

49. Woodside Street ... Stamford, CT 06902

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98 E. Main St. Rockville, CT

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case	ME	METAL CRACKED
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jam	MET	METAL CRACKED
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49 Woodside Street...Stamford, CT.06902

98 E. Main St. Rockville, CT

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mg / cm ^2 mg / cm ^2	CONCRETE CRACKED Positive	Wood CRACKED Positive	PLASTER CRACKED Null	METAL CRACKED Negative	WOOD CRACKED Negative	CONCRETE CRACKED Null	CONCRETE CRACKED Null	METAL CRACKED Positive	METAL CRACKED Positive	WOOD CRACKED Positive	PLASTER CRACKED Null	WOOD CRACKED Negative	WOOD CRACKED Positive	WOOD CRACKED Negative	PLASTER CRACKED Null	PLASTER CRACKED Null	WOOD CRACKED Negative	WOOD CRACKED Positive	WOOD CRACKED Positive	WOOD CRACKED Positive	WOOD CRACKED Negative	WOOD CRACKED Positive	WOOD CRACKED Positive	PLASTER CRACKED Positive	PLASTER CRACKED Positive	PLASTER CRACKED Positive		WOOD OBACKED Nemine	WOOD CRACKED Positive	METAL CRACKED Negative WOOD CRACKED Positive	METAL CRACKED Negative METAL CRACKED Negative WOOD CRACKED Positive	WOOD CRACKED Negative METAL CRACKED Negative METAL CRACKED Negative WOOD CRACKED Positive	WOOD CRACKED Negative WOOD CRACKED Negative METAL CRACKED Negative METAL CRACKED Negative WOOD CRACKED Negative WOOD CRACKED Negative
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	1.20 + 0	1 USILIYE	CRACKED	MEJAL		case	DOOR	A	6	FOURTH	98 e main	2015-07-16 10:11	33
ŝ	4.70 + 2	INCRALING	CRACKED	METAL			DOOR	A	6	FOURTH	98 e main	2015-07-16 10:11	32
10 2	0.70 + 0.	Negative	CRACKED	WOOD		intenor	DOOR		6	FOURTH	98 e main	2015-07-16 10:10	31
3 CI	0.00 + 0.0	Nomine	CRACKED	WOOD		interior	WALL		6	FOURTH	98 e main	2015-07-16 10:10	30
5 5		Negative	CRACKED	WOOD		sash	WINDOW	D	6	FOURTH	98 e main	2015-07-16 10:10	29
5	7.00 ± 0.	POSITIVE	CRACKED	MOOD		case	WINDOW	D	6	FOURTH	98 e main	2015-07-16 10:09	28
92 92	U.UU ± 0.0	Negative	CRACKED	CONCRETE			WALL	D	6	FOURTH	98 e main	2015-07-16 10:09	27
s č	1.10 ± 0.	NUI	CRACKED	CONCRETE	1		WALL	C	6	FOURTH	98 e main	2015-07-16 10:08	26
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2.10	i3.00 ± 1	Positive	CRACKED	WOOD			CEILING	В	6	FOURTH	98 e main	2015-07-16 10:07	34
/0	4.00 ± 2.	Positive	CRACKED	WOOD		case	DOOR	в	6	FOURTH	98 e main	2015-07-16 10:07	ដ
	ð./0 ± 0	POSITIVE	CRACKED	MOOD			DOOR	в	6	FOURTH	98 e main	2015-07-16 10:07	12
, t	rc = 00.7	POSITIVE	CRACKED	WOOD		sash	WINDOW	в	6	FOURTH	98 e main	2015-07-16 10:07	11
	100 ± 2.	POSITIVE	CRACKED	MOOD		case	WINDOW	B	6	FOURTH	98 e main.	2015-07-16 10:07	0
9		Negative	CRACKED	METAL		case	DOOR	ш	6	FOURTH	98 e main	2015-07-16 10:06	9
5 \$	0.10 ± 0.1	Negative	CRACKED	METAL			DOOR	₿	6	FOURTH	98 e main	2015-07-16 10:06	00
1 0	1,0 ± 010	Null	CRACKED	CONCRETE			WALL	в	6	FOURTH	98 e main	2015-07-16 10:06	7
	0.10 ± 0.1	Negative	CRACKED	MOOD			FLOOR	A	6	FOURTH	98 e main	2015-07-16 10:05	6
з ё	5.10 ± 1.5	Positive	CRACKED	WOOD			BASEBOARD	A	6	FOURTH	98 e main	2015-07-16 10:05	UN
	0.12 ± 0.0	Null	CRACKED	CONCRETE			WALL	A	6	FOURTH	98 e main	2015-07-16 10:05	4
	5,50 ± 2.1	Positive	CRACKED	WOOD			TRIM		Un	FOURTH	98 e main	2015-07-16 10:04	ŝ
	9.20 ± 1.4	Positive	CRACKED	WOOD			CEILING		Un	FOURTH	98 e main	2015-07-16 10:04	2
• ē	8.10 ± 7.1	Positive	CRACKED	WOOD			COLUMN		Un	FOURTH	98 e main	2015-07-16 10:03	1
o io	0.02 ± 0.0	Negative	CRACKED	WOOD			FLOOR		S	FOURTH	98 e main	2015-07-16 10:03	0
-20	10.10 ± 8.	Positive	CRACKED	MOOD		case	DOOR	D	Un	FOURTH	98 e main	2015-07-16 10:03	9
	0.0 ± 0.3	Negative	CRACKED	METAL			DOOR	D	S	FOURTH	98 e main	2015-07-16 10:03	80
	0.00 ± 0.0	Negative	CRACKED	METAL			pipe	C	S	FOURTH	98 e main	2015-07-16 10:02	Ţ
	0.00 + 0.0	Null	CRACKED	brick			WALL	C	S	FOURTH	98 e main	2015-07-16 10:02	6
	0.00 ± 0.0	Negative	CRACKED	CONCRETE			WALL	С	5	FOURTH	98 e main	2015-07-16 10:01	U1
, 4		NUII	CRACKED	CONCRETE			WALL	в	S	FOURTH	98 e main	2015-07-16 10:01	44
00	10.40 ± 9.	Positive	CRACKED	MOOD			WALL	в	S1	FOURTH	98 e main	2015-07-16 10:01	ي.
	9.70 ± 8.0	Positive	CRACKED	WOOD		sash	WINDOW	A	Un	FOURTH	98 e main	2015-07-16 10:00	2
, с	3.60 ± 2.8	Null	CRACKED	WOOD		stool	WINDOW	A	S	FOURTH	98 e main	2015-07-16 10:00	-
	8.00 ± 0.9	Positive	CRACKED	WOOD		case	WINDOW	A	Un	FOURTH	98 e main	2015-07-16 10:00	<u> </u>
, e	6.80 ± 5.8	Positive	CRACKED	WOOD			WALL	A	5	FOURTH	98 e main	2015-07-16 10:00	ç
. 4	0.06 ± 0.0	Negative	CRACKED	CONCRETE			WALL	^	S	FOURTH	98 e main	2015-07-16 10:00	~
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270	269	268	267	266	265	264	263	262	261	260	259	258	257	256	255	254	253	252	251	250	249	248	247	246	245	244	243	242	241	240	239	238	237	236	235
2015-07-16 10:29 2015-07-16 10:29	2015-07-16 10:28	2015-07-16 10:27	2015-07-16 10:27	2015-07-16 10:26	2015-07-16 10:26	2015-07-16 10:25	2015-07-16 10:25	2015-07-16 10:25	2015-07-16 10:24	2015-07-16 10:23	2015-07-16 10:23	2015-07-16 10:23	2015-07-16 10:22	2015-07-16 10:22	2015-07-16 10:22	2015-07-16 10:21	2015-07-16 10:21	2015-07-16 10:20	2015-07-16 10:20	2015-07-16 10:20	2015-07-16 10:20	2015-07-16 10:19	2015-07-16 10:17	2015-07-16 10:16	2015-07-16 10:16	2015-07-16 10:16	2015-07-16 10:15	2015-07-16 10:15	2015-07-16 10:15	2015-07-16 10:14	2015-07-16 10:14	2015-07-16 10:14	2015-07-16 10:14	2015-07-16 10:13	2015-07-16 10:13
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FLOOR	WALL	WALL	FLOOR	beam	COLUMN	WINDOW	WINDOW	Wall	DOOR	DOOR	WALL	WALL	DOOR	DOOR	WALL	DOOR	DOOR	WINDOW	WINDOW	WINDOW	Floor	WALL	stair	stair	stair	WALL	WALL	DOOR	DOOR	WALL	WALL	CEILING	beam	WALL	DOOR
						stool	case		case				case			case		sash	stool	case			таіl	riser	tread			case							
WOOD	CONCRETE	DRYWALL	WOOD	WOOD	WOOD	WOOD	WOOD	CONCRETE	WOOD	WOOD	CONCRETE	WOOD	WOOD	METAL	DRYWALL	METAL	METAL	WOOD	MOOD	WOOD	WOOD	CONCRETE	METAL	DRYWALL	DRYWALL	DRYWALL	brick	METAL	METAL	WOOD	WOOD	CONCRETE	CONCRETE	CONCRETE	METAL
CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED
Negative	Null	Negative	Negative	Positive	Positive	Negative	Positive	Negative	Positive	Positive	Positive	Negative	Negative	Negative	Negative	Negative	Negative	Positive	Null	Positive	Negative	Positive	Negative	Negative	Negative	Negative	Null	Positive	Negative	Negative	Null	Positive	Negative	Negative	Negative
0.03 ± 0.09	0.90 ± 0.00	0.00 ± 0.02	0.19 ± 0.23	18.50 ± 16.30	16.90 ± 14.90	0.50 ± 0.40	12.20 ± 10.50	0.09 ± 0.06	7.90 ± 6.80	4.60 ± 3.30	1.70 ± 0.70	0.05 ± 0.07	0.00 ± 0.02	0.13 ± 0.19	0.00 ± 0.02	0.00 ± 0.03	0.01 ± 0.04	4.40 ± 3.20	1.00 ± 0.30	13.10 ± 11.10	0.04 ± 0.06	2.30 ± 1.20	0.01 ± 0.04	0.50 ± 0.20	0.01 ± 0.03	0.00 ± 0.02	0.04 ± 0.02	13.00 ± 11.60	0.22 ± 0.59	0.05 ± 0.14	0.00 + 0.02	6.30 ± 3.70	0.03 ± 0.05	0.04 ± 0.03	0.06 ± 0.10
mg/cr	mg / cm	mg/cin	mg/cin	mg / cm	mg / cm	mg/cm	mg / cm	mg/cm/	mg / cm	mg/cm	mg / cm /	mg/cm^	tng/cin ^	mg/cm^2	mg / cm /	mg / cm ^	mg / cin ^	mg/cm^	mg / cm ^	mg/cm/	mg / cm ^	mg/ cm /	mg/cm^	mg/cm^	mg/cm/	mg/cm^	mg / cm ^	mg/cm^	mg / cm ^2	mg / cm ^/	mg/cm^	mg/cm^	ing / cm ^2	mg / cm ^2	mg / cm ^2

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nio Gu		товатьс	CNACKED	WOOD		case	DOOK		14	SECOND	98 e main	2015-07-16 11:05	345
	80.0 ± 21.0	Nombing		WOOD			DOOR		14	SECOND	98 e main	2015-07-16 11:05	344
	0.00 ± 0.02	Negative	CRACKED	MEIAL			WINDOW	A	14	SECOND	98 e main	2015-07-16 11:05	343
z., uro / Bui	0.00 ± 0.02	Negative	CRACKED	WOOD			WALL	A	14	SECOND	98 e main	2015-07-16 11:05	342
$m_{\rm e}/m_{\rm e}/m_{\rm e}$	0.02 ± 0.62	Negative	CRACKED	MOOM		case	DOOR		13	SECOND	98 e main	2015-07-16 11:02	341
mg / cm ^{v2}	0.00 ± 0.02	Negative	CRACKED	WOOD			DOOR		13	SECOND	98 e main	2015-07-16 11:02	340
mg / cm / 2	c0.0 ± 10.0	Negative	CRACKED	WOOD			WALL	D	13	SECOND	98 e main	2015-07-16 11:02	339
mg/cm ²	0.01 ± 0.06	Negative	CRACKED	DRYWALL			WALL	C	13	SECOND	98 e main	2015-07-16 11:01	338
mg/cm^2	0.03 ± 0.11	Null	CRACKED	WOOD		sash	WINDOW	С	13	SECOND	98 e main	2015-07-16 11:01	337
mg / cm ^2	0.00 ± 0.02	Negative	CRACKED	WOOD		stool	WINDOW	С	13	SECOND	98 e main	2015-07-16 11:01	336
mg/cm^2	0.01 ± 0.04	Negative	CRACKED	WOOD		case	WINDOW	С	13	SECOND	98 e main	2015-07-16 11:00	335
mg/cm^2	0.01 ± 0.04	Negative	CRACKED	WOOD			WALL	C	-13	SECOND	98 e main	2015-07-16 11:00	334
mg/cm^2	0.00 ± 0.02	Negative	CRACKED	WOOD			BASEBOARD	A	13	SECOND	98 e main	2015-07-16 10:58	333
mg/cm ^2	0.06 ± 0.20	Negative	CRACKED	WOOD			WALL	D	13	SECOND	98 e main	2015-07-16 10:58	332
ing/cm^2	0.01 ± 0.07	Negative	CRACKED	MOOD			WALL	A	13	SECOND	98 e main	2015-07-16 10:58	331
mg / cm ^2	0.00 ± 0.02	Negative	CRACKED	METAL		rail	stair		12	THIRD	98 e main	2015-07-16 10:54	330
mg/cm^2	0.01 ± 0.03	Negative	CRACKED	WOOD		stringer	stair		12	THIRD	98 e main	2015-07-16 10:54	329
ing / cm ^2	0.00 ± 0.02	Negative	CRACKED	WOOD		nser	stair		12	THIRD	98 e main	2015-07-16 10:54	328
,mg / cm ^2	0.00 ± 0.02	Negative	CRACKED	WOOD		tread	stair		12	THIRD	98 e main	2015-07-16 10:53	327
mg/cm^2	0.40 ± 0.60	Negative	CRACKED	WOOD			WALL		12	THIRD	98 e main	2015-07-16 10:53	326
mg/cm^2	0.21 ± 0.30	Null	CRACKED	CONCRETE			WALL	С	12	THIRD	98 e main	2015-07-16 10:53	325
mg / cin ^2	0.04 ± 0.05	Null	CRACKED	brick			WALL	Ö	12	THIRD	98 e main	2015-07-16 10:53	324
mg/cm^2	18.40 ± 15.80	Positive	CRACKED	WOOD			WINDOW	С	12	THIRD	98 e main	2015-07-16 10:52	323
mg/cm^2	0.10 ± 0.15	Negative	CRACKED	METAL		case	DOOR	С	12	THIRD	98 e main	2015-07-16 10:52	322
mg / cm ^2	0.11 ± 0.34	Negative	CRACKED	METAL			DOOR	С	12	THIRD	98 e main	2015-07-16 10:52	321
mg/cm ²	0.00 ± 0.02	Negative	CRACKED	WOOD			DOOR	A	12	THIRD	98 e main	2015-07-16 10:51	320
mg / cm ^{x2}	0.00 ± 0.02	Negative	CRACKED	DRYWALL			WALL	A	12	THIRD	98 e main	2015-07-16 10:51	919
mg / cm ^2	0.05 ± 0.12	Negative	CRACKED	WOOD		case	DOOR		11	THIRD	98 e main	2015-07-16 10:50	318
mg / cm ^2	0.01 ± 0.09	Negative	CRACKED	WOOD			DOOR		11	THIRD	98 e main	2015-07-16 10:50	317
mg/cm^2	13.30 ± 10.90	Positive	CRACKED	WOOD		ceiling	Beam	С	11	THIRD	98 e main	2015-07-16 10:50	316
mg/cm ^2	15.80 ± 12.20	Positive	CRACKED	WOOD			CEILING	ũ	11	THIRD	98 c main	2015-07-16 10:50	315
mg/cm^2	10.00 ± 8.80	Positive	CRACKED	WOOD			WINDOW	Ċ	11	THIRD	98 e main	2015-07-16 10:49	314
mg / cm ^2	0.23 ± 0.24	Null	CRACKED	CONCRETE			WALL	С	11	THIRD	98 e main	2015-07-16 10:49	313
mg/cm^2	0.60 ± 0.20	Negative	CRACKED	METAL		case	DOOR	в	11	THIRD	98 e main	2015-07-16 10:48	312
mg / cm ^2	0.03 ± 0.07	Negative	CRACKED	METAL			DOOR	в	11	THIRD	98 e main	2015-07-16 10:48	311
mg / cm ^2	0.00 ± 0.02	Negative	CRACKED	CONCRETE			WALL	в	11	THIRD	98 e main	2015-07-16 10:47	310
mg / cm ^2	0.11 ± 0.24	Null	CRACKED	CONCRETE			WALL	A	11	THIRD	98 e main	2015-07-16 10:46	309
Units	PDC	Results	Condition	Substrate	Mise 2	Mise 1	Component	Side	Room	Floor	Site	Time	Index
In the second		No. of Concession, Name											

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	418 419	417	416	415	414	413	412	411	410	409	408	407	406	405	404	403	402	401	400	399	398	397	396	395	394	393	392	391	390	389	388	387	386	385	384	383	Index
	2015-07-16 11:33	2015-07-16 11:33	2015-07-16 11:33	2015-07-16 11:33	2015-07-16 11:32	2015-07-16 11:31	2015-07-16 11:31	2015-07-16 11:31	2015-07-16 11:31	2015-07-16 1:30	2015-07-16 11:30	2015-07-16 11:29	2015-07-16 11:28	2015-07-16 11:28	2015-07-16 11:28	2015-07-16 11:28	2015-07-16 11:27	2015-07-16 11:27	2015-07-16 11:25	2015-07-16 11:25	2015-07-16 11:25	2015-07-16 11:24	2015-07-16 11:24	2015-07-16 11:24	2015-07-16 11:24	2015-07-16 11:23	2015-07-16 11:23	2015-07-16 11:23	2015-07-16 11:23	2015-07-16 11:22	2015-07-16 11:22	2015-07-16 11:22	2015-07-16 11:21	2015-07-16 11:21	2015-07-16 11:21	2015-07-16 11:20	Time
	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	Site
	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	Floor
	16	16	16	16	16	16	16	16	16 .	16	16	16	16	16	16	16	16	16	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	16	16	16	Room
	a c	C	c	С		D	D	D	D	D	D	в				С	С	0	A	в	в	В	в	С	C	С	в	в	B	в	B	в	С	в	B	В	Side
	BASEBOARD	WINDOW	WINDOW	WALL	Pipe	Beam	CEILING	WALL	WINDOW	WALL	WALL	WINDOW	DOOR	DOOR	WALL	FLOOR	WALL	WALL	WALL	WALL	WINDOW	WINDOW	WALL	WALL	DOOR	DOOR	DOOR	DOOR	WALL	DOOR	DOOR	WALL	WALL	DOOR	DOOR	WINDOW	e Component
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	11SH	bol	ISE										õ	erior	erior						2				ŭ		Ų			C				õ			ise I Mise
	WOOD WOOD	WOOD	Ise WOOD	CONCRETE	Metal	WOOD	WOOD	WOOD	WOOD	brick	CONCRETE	WOOD	WOOD	erior WOOD	DRYWALL	MOOD	brick	DRYWALL	brick	brick	WOOD	WOOD	brick	brick	METAL	METAL	METAL	METAL	CONCRETE	e WOOD	METAL	brick	brick	METAL	METAL	METAL	ise 1 Mise 2 Substrate
	WOOD CRACKED	wood CRACKED	WOOD CRACKED	CONCRETE CRACKED	Metal CRACKED	WOOD CRACKED	WOOD CRACKED	WOOD CRACKED	WOOD CRACKED	brick CRACKED	CONCRETE CRACKED	WOOD CRACKED	se WOOD CRACKED	erior WOOD :CRACKED	erior DRYWALL CRACKED	WOOD CRACKED	brick CRACKED	DRYWALL CRACKED	brick CRACKED	brick CRACKED	WOOD CRACKED	WOOD CRACKED	brick CRACKED	brick CRACKED	METAL CRACKED	METAL CRACKED	METAL CRACKED	METAL CRACKED	CONCRETE CRACKED	e WOOD CRACKED	METAL CRACKED	brick CRACKED	brick CRACKED	e METAL CRACKED	METAL CRACKED	METAL CRACKED	ise 1 Mise 2 Substrate Condition
	WOOD CRACKED Positive	ool WOOD CRACKED Null	ISE WOOD CRACKED Positive	CONCRETE CRACKED Null	Metal CRACKED Positive	WOOD CRACKED Positive	WOOD CRACKED Positive	WOOD CRACKED Null	WOOD CRACKED Positive	brick CRACKED Null	CONCRETE CRACKED Null	WOOD CRACKED Negative	se WOOD CRACKED Negative	erior WOOD CRACKED Negative	erior DRYWALL CRACKED Negative	WOOD CRACKED Negative	brick CRACKED Null	DRYWALL CRACKED Null	brick CRACKED Null	brick CRACKED Null	WOOD CRACKED Positive	WOOD CRACKED Positive	brick CRACKED Null	brick CRACKED Null	METAL CRACKED Negative	METAL CRACKED Negative	METAL CRACKED Negative	METAL CRACKED Negative	CONCRETE CRACKED Null	e WOOD CRACKED Negative	METAL CRACKED Null	brick CRACKED Null	brick CRACKED Null	e METAL CRACKED Negative	METAL CRACKED Negative	METAL CRACKED Negative	ise 1 Mise 2 Substrate Condition Results
	WOOD CRACKED Positive 3.20 ± 1.80	ool WOOD CRACKED Null 1.50 ± 0.80	se WOOD CRACKED Positive 6.20 ± 4.80	CONCRETE CRACKED Null 0.05 ± 0.07	Metal CRACKED Positive 22.60 ± 20.30	WOOD CRACKED Positive 14.10 ± 10.80	WOOD CRACKED Positive 13.70 ± 11.10	WOOD CRACKED Null (1.80 ± 0.90	WOOD CRACKED Positive 1.60 ± 0.60	brick CRACKED Null 0.00 ± 0.02	CONCRETE CRACKED Null 0.06 ± 0.08	WOOD CRACKED Negative 0.00 ± 0.02	se WOOD CRACKED Negative 0.00 ± 0.02	erior WOOD CRACKED Negative 0.00 ± 0.02	erior DRYWALL CRACKED Negative 0.00 ± 0.02	WOOD CRACKED Negative 0.00 ± 0.02	brick CRACKED Null 0.08 ± 0.12	DRYWALL CRACKED Null 0.00 ± 0.02	brick CRACKED Null 0.01 ± 0.03	brick CRACKED Null 0.01 ± 0.03	h WOOD CRACKED Positive 4.90 ± 3.70	WOOD CRACKED Positive 4.00 ± 2.50	brick CRACKED Null 0.02 ± 0.07	brick CRACKED Null 0.07 ± 0.32	METAL CRACKED Negative 0.00 ± 0.02	METAL CRACKED Negative 0.02 ± 0.05	METAL CRACKED Negative 0.00 ± 0.02	METAL CRACKED Negative 0.00 ± 0.02	CONCRETE CRACKED Null 0.00 ± 0.02	e WOOD CRACKED Negative 0.03 ± 0.08	METAL CRACKED Null 0.22 ± 0.16	brick CRACKED Null 0,03 ± 0.06	brick CRACKED Null 0.05 ± 0.12	e METAL CRACKED Negative 0.00 ± 0.02	METAL CRACKED Negative 0.00 ± 0.02	METAL CRACKED Negative 0.04 ± 0.08	ise I Mise 2 Substrate Condition Results PbC
q	HST WOOD CRACKED Positive 3.20 ± 3.70 mg/cm 2	001 WOOD CRACKED Null 1.50 ± 0.80 mg/cm ^2	se WOOD CRACKED Positive 6.20 ± 4.80 mg/cm^2	CONCRETE CRACKED Null 0.05 ± 0.07 mg/cm ^2	Metal CRACKED Positive 22.60 ± 20.30 mg/cm ^2	WOOD CRACKED Positive 14.10 ± 10.80 mg/cm ^2	WOOD CRACKED Positive 13.70 ± 11.10 mg/cm ^2	WOOD CRACKED Null (1.80 ± 0.90 ;mg/cm ^A 2	WOOD CRACKED Positive 1.60 ± 0.60 mg/cm ²	brick CRACKED Null 0.00 ± 0.02 mg/cm ²	CONCRETE CRACKED Null 0.06 ± 0.08 mg/cm ²	WOOD CRACKED Negative 0.00 ± 0.02 mg / cm 12	se WOOD CRACKED Negative 0.00 ± 0.02 mg / cm $^{\Lambda}2$	erior WOOD CRACKED Negative 0.00 ± 0.02 mg/cm ^{A2}	erior DRYWALL CRACKED Negative 0.00 ± 0.02 mg/cm.^2	WOOD CRACKED Negative 0.00 ± 0.02 mg/cm ²	brick CRACKED Null 0.08 ± 0.12 mg/cm ²	DRYWALL CRACKED Null $:0.00 \pm 0.02$ mg/cm ²	brick CRACKED Null 0.01 ± 0.03 mg/cm ²	brick CRACKED Null 0.01 ± 0.03 mg/cm ²	h WOOD CRACKED : Positive 4.90 ± 3.70 mg/cm 2	WOOD CRACKED Positive 4.00 ± 2.50 mg/cm ^2	brick CRACKED Null 0.02 ± 0.07 mg/cm ²	brick CRACKED Null 0.07 ± 0.32 mg/cm ²	METAL CRACKED Negative 0.00 ± 0.02 mg/cm ²	METAL CRACKED Negative 0.02 ± 0.05 mg/cm ²	METAL CRACKED Negative 0.00 ± 0.02 mg/cm ²	METAL CRACKED Negative 0.00 ± 0.02 mg/cm ²	CONCRETE CRACKED Null 0.00 ± 0.02 mg/cm ²	e WOOD CRACKED Negative 0,03 ± 0.08 mg/cm ²	METAL CRACKED Null 0.22 ± 0.16 mg/cm ^{-/2}	brick CRACKED Null 0.03 ± 0.06 ing / cm 2	brick CRACKED Null 0.05 ± 0.12 ing / cm 12	we METAL CRACKED Negative 0.00 ± 0.02 mg/cm ^A 2	METAL CRACKED Negative 0.00 ± 0.02 mg/cm ²	METAL CRACKED Negative 0.04 ± 0.08 mg/cm ²	ise I Mise 2 Substrate Condition Results PbC Units

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	456	455	454	453	452 2	451 2	450 2	449 2	448 2	447 2	446 2	445 2	444 2	443 2	442 2	441 2	440 2	439 2	438 2	437 2	436 2	435 2	434 2	433 2	432 2	431 2	430 2	429 2	428 2	427 2	426 2	425 2	424 2	423 2	422 2	421 2	420 2
Second SECOND II C WILL Ford WOOP CAUCED Name <	2015-07-16 11:54	2015-07-16 11:53	2015-07-16 11:53	015-07-16 11:53	015-07-16 11:53	015-07-16 11:52	015-07-16 11:52	2015-07-16 11:52	015-07-16 11:52	015-07-16 11:51	015-07-16 11:51	015-07-16 11:51	015-07-16 11:50	015-07-16 11:50	015-07-16 11:50	015-07-16 11:49	015-07-16 11:49	015-07-16 11:49	015-07-16 11:48	015-07-16 11:48	015-07-16 11:48	015-07-16 11:47	015-07-16 11:47	015-07-16 11:47	015-07-16 11:46	015-07-16 11:45	015-07-16 11:45	015-07-16 11:44	015-07-16 11:44	015-07-16 11:41	015-07-16 11:36	015-07-16 11:36	015-07-16 11:35	015-07-16 11:35	015-07-16 11:35	015-07-16 11:35	015-07-16 11:34
SECOND 17 C WINDOW WALL read WOOD CALCKED Name <	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main		98 e main	98 e main	98 c main	98 e main	98 e main	98 e main	98 e main
	FORTH	FORTH	FORTH	FORTH	FORTH	FORTH	THIRD	THIRD	THIRD	THIRD	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND	SECOND						SECOND						
C WINDOW WOOD CRACKED Negrice 0.06 ± 0.07 mg/ m ² sair rind WOOD CRACKED Negrice 0.06 ± 0.07 mg/ m ² sair rindr WOOD CRACKED Negrice 0.06 ± 0.07 mg/ m ² Galibrai singer WOOD CRACKED Negrice 0.02 ± 0.07 mg/ m ² Calibraic WALL CONCRETE CRACKED Nulli 0.02 ± 0.07 mg/ m ² Calibraic Intect Intect NTACT Negrice 0.02 ± 0.07 mg/ m ² A DOOR case Intect NTACT Negrice 0.01 ± 0.02 mg/ m ² A DOOR case MG/D CRACKED Null 0.02 ± 0.07 mg/ m ² A DOOR case MG/T CRACKED Null 0.01 ± 0.05 mg/ m ² A DOOR case METAL CRACKED Negrice 0.01 ± 0.06 mg/ m ² A MINDOW	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE	OUTSIDE						17	17	17	17	17	17	17
WINDOW Fred WOOD CRACKED Negative 0.00 ± 0.00 mg/(m ²) stair riser WOOD CRACKED Negative 0.00 ± 0.00 mg/(m ²) stair riser WOOD CRACKED Negative 0.00 ± 0.00 mg/(m ²) stair riser WOOD CRACKED Negative 0.00 ± 0.00 mg/(m ²) stair riser WOOD CRACKED Null 0.00 ± 0.00 mg/(m ²) stair Intact Intact NTACT Negative 0.00 ± 0.00 mg/(m ²) Calibrate Intact Intact INTACT Negative 0.00 ± 0.00 mg/(m ²) Galibrate Intact Intact INTACT Negative 0.00 ± 0.00 mg/(m ²) Galibrate Lintact Intact INTACT Negative 0.00 ± 0.00 mg/(m ²) Galibrate Lintact Intact Intact INTACT Negative 0.00 ± 0.00 mg/(m ²) Galibrat Casae	A	A	A	A	A	A	A	A	A	A	A	A	A	A	1	A	A	>	A	A	A	A	A	A	A						C	C					С
trad WOOD CRACKED Negative 28.04 ± 22.40 mg/cm 2 tinger WOOD CRACKED Negative 0.00 ± 0.02 mg/cm 2 tinger WOOD CRACKED Negative 0.00 ± 0.02 mg/cm 2 WOOD CRACKED Negative 0.00 ± 0.02 mg/cm 2 WOOD CRACKED Nult 0.00 ± 0.02 mg/cm 2 WOOD CRACKED Nult 0.00 ± 0.02 mg/cm 2 WOOD CRACKED Nult 0.00 ± 0.02 mg/cm 2 Innact INTACT Negative 0.00 ± 0.02 mg/cm 2 Innact INTACT Negative 0.00 ± 0.02 mg/cm 2 METAL CRACKED Nult 0.01 ± 0.05 mg/cm 2 METAL CRACKED Nult 0.01 ± 0.05 mg/cm 2 MOOD CRACKED Nult 0.01 ± 0.05 mg/cm 2 METAL CRACKED Nult 0.01 ± 0.05 mg/cm 2 METAL CRACKED Negative 0.	TRIM	TRIM	DOOR	DOOR	WINDOW	WALL	WALL	DOOR	DOOR	WINDOW	WINDOW	WINDOW	stair	stair	DOOR	DOOR	rail	WINDOW	WALL	DOOR	DOOR	WALL	DOOR	DOOR	WALL	Calibrate	Calibrate	Calibrate	Calibrate		WALL	WALL	stair	stair	stair	WALL	WINDOW
WOOD CRACKED Positive 22.40 mg/m^2 WOOD CRACKED Negative 0.06 ± 0.07 mg/m^2 WOOD CRACKED Negative 0.06 ± 0.07 mg/m^2 WOOD CRACKED Negative 0.02 ± 0.07 mg/m^2 WOOD CRACKED Negative 0.02 ± 0.07 mg/m^2 CONCRETE CRACKED Null 1.78 ± 0.00 mg/m^2 Intact INTACT Negative 0.00 ± 0.02 mg/m^2 Intact INTACT Negative 0.01 ± 0.05 mg/m^2 Intact INTACT Negative 0.01 ± 0.05 mg/m^2 METAL CRACKED Null 0.06 ± 0.14 mg/m^2 METAL CRACKED Null 0.01 ± 0.05 mg/m^2 MOOD CRACKED Null 0.01 ± 0.05 mg/m^2 METAL CRACKED Null 0.01 ± 0.05 mg/m^2 METAL CRACKED Negative 0.06 ± 0.02	upper	upper	case					case		sash	stool	case			case					case			case										stringer	пзсг	tread		
WOOD CRACKED Negative $28.10 \pm 2.2.40$ mg/cm^2 WOOD CRACKED Negative 0.06 ± 0.07 mg/cm^2 WOOD CRACKED Negative 0.06 ± 0.07 mg/cm^2 WOOD CRACKED Negative 0.00 ± 0.02 mg/cm^2 WOOD CRACKED Negative 0.00 ± 0.02 mg/cm^2 WOOD CRACKED Null 0.00 ± 0.02 mg/cm^2 CONCRETE CRACKED Null 0.00 ± 0.02 mg/cm^2 Intact INTACT Negative 0.01 ± 0.02 mg/cm^2 METAL CRACKED Negative 0.01 ± 0.02 mg/cm^2 METAL CRACKED Negative																																					
CRACKED Positive 28.10 ± 22.40 mg/cm 2 CRACKED Negative 0.06 ± 0.09 $mg/cm ^{2}$ CRACKED Negative 0.02 ± 0.07 $mg/cm ^{2}$ CRACKED Negative 0.02 ± 0.07 $mg/cm ^{2}$ CRACKED Negative 0.02 ± 0.07 $mg/cm ^{2}$ CRACKED Null 0.00 ± 0.02 $mg/cm ^{2}$ CRACKED Null 0.00 ± 0.02 $mg/cm ^{2}$ INTACT Negative 0.01 ± 0.02 $mg/cm ^{2}$ INTACT Negative 0.01 ± 0.05 $mg/cm ^{2}$ CRACKED Null 0.02 ± 0.07 $mg/cm ^{2}$ CRACKED Null 0.01 ± 0.05 $mg/cm ^{2}$ CRACKED Null 0.02 ± 0.07 $mg/cm ^{2}$	WOOD	MOOD	METAL	METAL	WOOD	brick	brick	METAL	METAL	WOOD	WOOD	WOOD	METAL	METAL	METAL	METAL	METAL	WOOD	brick	WOOD	WOOD	brick	METAL	METAL	brick	Intact	Intact	Intact	Intact		CONCRETE	CONCRETE	WOOD	WOOD	WOOD	WOOD	WOOD
Positive 28.10 ± 22.40 $mg/cm ^2$ Negative 0.06 ± 0.09 $mg/cm ^2$ Negative 0.02 ± 0.07 $mg/cm ^2$ Negative 0.02 ± 0.07 $mg/cm ^2$ Null 0.02 ± 0.07 $mg/cm ^2$ Null 0.02 ± 0.07 $mg/cm ^2$ Null 0.00 ± 0.02 $mg/cm ^2$ Negative 0.01 ± 0.02 $mg/cm ^2$ Positive 0.01 ± 0.02 $mg/cm ^2$ Null 0.02 ± 0.07 $mg/cm ^2$ Negative 0.04 ± 0.05 $mg/cm ^2$ Null 0.04 ± 0.05 $mg/cm ^2$ Null 0.01 ± 14.70 $mg/cm ^2$ Null 0.01 ± 0.05 $mg/cm ^2$ Null 0.01 ± 0.02 $mg/cm ^2$ Null 0.01 ± 12.20 $mg/cm ^2$ Null 0.01 ± 12.20 $mg/cm ^2$ Null 0.02 ± 0.07 $mg/cm ^2$ Negative 0.01 ± 21.10 $mg/cm ^2$ Negative 0.02 ± 0.07 $mg/cm ^2$	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	CRACKED	INTACT	INTACT	INTACT	INTACT		CRACKED						
28.10 ± 22.40 mg/cm 2 0.06 ± 0.09 mg/cm 2 0.02 ± 0.07 mg/cm 2 0.00 ± 0.02 mg/cm 2 0.01 ± 0.02 mg/cm 2 0.01 ± 0.02 mg/cm 2 0.01 ± 0.05 mg/cm 2 0.04 ± 0.05 mg/cm 2 0.04 ± 0.05 mg/cm 2 0.01 ± 0.05 mg/cm 2 0.04 ± 0.05 mg/cm 2 0.04 ± 0.05 mg/cm 2 0.01 ± 0.05 mg/cm 2 0.02 ± 0.07 mg/cm 2 0.04 ± 12.20 mg/cm 2 0.05 ± 13.10 mg/cm 2 0.02 ± 13.10 mg/cm 2 0.02 ± 0.07 mg/cm 2 0.01 ± 0.02 mg/cm 2 0.02 ± 0.07 <td>Positive</td> <td>Negative</td> <td>Negative</td> <td>Negative</td> <td>Positive</td> <td>Null</td> <td>Null</td> <td>Negative</td> <td>Negative</td> <td>Positive</td> <td>Positive</td> <td>Null</td> <td>Negative</td> <td>Negative</td> <td>Positive</td> <td>Negative</td> <td>Negative</td> <td>Positive</td> <td>Null</td> <td>Positive</td> <td>Positive</td> <td>Null</td> <td>Negative</td> <td>Negative</td> <td>Null</td> <td>Positive</td> <td>Negative</td> <td>Positive</td> <td>Negative</td> <td></td> <td>Null</td> <td>Positive</td> <td>Negative</td> <td>Negative</td> <td>Negative</td> <td>Negative</td> <td>Positive</td>	Positive	Negative	Negative	Negative	Positive	Null	Null	Negative	Negative	Positive	Positive	Null	Negative	Negative	Positive	Negative	Negative	Positive	Null	Positive	Positive	Null	Negative	Negative	Null	Positive	Negative	Positive	Negative		Null	Positive	Negative	Negative	Negative	Negative	Positive
mg / cm ^2 mg / cm ^2	6.70 ± 4.50	0.60 ± 0.30	0.01 ± 0.08	0.03 ± 0.10	28.40 ± 20.60	0.03 ± 0.07	0.02 ± 0.07	0.00 ± 0.02	0.01 ± 0.04	29.10 ± 21.10	15.70 ± 13.10	0.00 ± 0.02	0.16 ± 0.33	0.02 ± 0.07	15.40 ± 12.20	0.00 ± 0.02	0.06 ± 0.09	10.70 ± 9.00	0.01 ± 0.04	6.40 ± 5.20	16.10 ± 14.70	0.01 ± 0.05	0.04 ± 0.06	0.06 ± 0.14	0.02 ± 0.07	3.60 ± 2.40	0.01 ± 0.05	4.30 ± 2.80	0.00 ± 0.02	1.78 ± 0.00	0.00 ± 0.02	3.70 ± 2.70	0.02 ± 0.07	0.00 ± 0.02	0.03 ± 0.07	0.06 ± 0.09	28.10 ± 22.40
	mg / cm ^2	mg/cm^2	mg / cm ^2	ing / cm ^2	mg / cm ^2	ing / cm ^2	Ing / cm ^2	mg / cm ^2	mg / cm ^2	mg / cm ^2	mg / cm ^2	ing / cm ^2	mg / cm ^2	mg / cm ^2	mg / cm ^2	mg / cm ^2	ing / cm ^2	mg / cm ^2	mg / cm ^2	mg / cm ^2	mg / cm ^2	lng / cm^2	mg / cm ^2	mg/cm^2	mg / cm ^2	ing / cm ^2	cps	mg / cm ^2	mg/cm^2								

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Index	Time	Cito	Flow	mm d	2	0	MA	NAL S	0	5		No. of the second se	140	
457	2015-07-16 11:55	98 e main		OUTSIDE	y y	TRIM	Internet 1	7 Denail	ann moon	Condition	Results	Pot	Units	
458	2015-07-16 11:55	98 e main	SECOND	OUTSIDE	A	TRIM	upper		WOOD	CRACKED	Negative	0.02 ± 0.08	mg/cm/2	
459	2015-07-16 11:55	98 e main	SECOND	OUTSIDE	A	WALL			brick	CRACKED	Null	0.02 ± 0.07	mg/cm^2	
460	2015-07-16 11:56	98 e main	SECOND	OUTSIDE	D	WALL			brick	CRACKED	Null	0.02 ± 0.07	mg/cm^{2}	
46 i	2015-07-16 11:56	98 e main	SECOND	OUTSIDE	D	DOOR			WOOD	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
462	2015-07-16 11:56	98 e main	SECOND	OUTSIDE	D	DOOR	case		WOOD	CRACKED	Negative	0.00 ± 0.02	mg/cm^2	
463	2015-07-16 11:56	98 e main	SECOND	OUTSIDE	D	DOOR			WOOD	CRACKED	Null	0.00 ± 0.02	mg/cm^2	
464	2015-07-16 11:56	98 e main	FIRST	OUTSIDE	D	WALL			WOOD	CRACKED	Negative	0.00 ± 0.02	mg/cm^2	
465	2015-07-16 11:57	98 e main	FIRST	OUTSIDE	С	WALL			WOOD	CRACKED	Negative	0.00 ± 0.03	mg / cm ^2	
466	2015-07-16 11:58	98 e main	FIRST	OUTSIDE	D	WALL			WOOD	CRACKED	Negative	0.00 ± 0.02	ing / cm ^2	
467	2015-07-16 11:58	98 e main	FIRST	OUTSIDE	D	DOOR			WOOD	CRACKED	Negative	0.02 ± 0.05	mg / cm ^2	
468	2015-07-16 11:58	98 e main	FIRST	OUTSIDE	D	DOOR	case		WOOD	CRACKED	Negative	0.04 ± 0.11	mg / cm ^2	
469	2015-07-16 11:58	98 e main	FIRST	OUTSIDE	D	DOOR	OH		METAL	CRACKED	Negative	0.01 ± 0.05	mg / cm ^2	
470	2015-07-16 11:59	98 e main	FIRST	OUTSIDE	A	WALL			WOOD	CRACKED	Negative	0.02 ± 0.07	mg / cm ^2	
471	2015-07-16 11:59	98 e main	FIRST	OUTSIDE	A	BASEBOARD			WOOD	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
472	2015-07-16 11:59	98 e main	FIRST	OUTSIDE	D	WALL			WOOD	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
473	2015-07-16 12:00	98 e main	FIRST	OUTSIDE	D	CEILING			WOOD	CRACKED	Null	0.00 ± 0.02	mg / cm ^2	
474	2015-07-16 12:00	98 e main	FIRST	18	D	WALL			WOOD	CRACKED	Negative	0.00 ± 0.02	'mg / cm ^2	
475	2015-07-16 12:01	98 e main	FIRST	18	D	DOOR			WOOD	CRACKED	Negative	0.00 ± 0.02	mg / cm ^2	
476	2015-07-16 12:01	98 e main	FIRST	18	A	WALL			Brick	CRACKED	Negative	0.03 ± 0.06	mg / cm ^2	
477	2015-07-16 12:01	98 c main	FIRST	18	в	WALL			Brick	CRACKED	Null	0.70 ± 0.40	tmg / cm ^2	
478	2015-07-16 12:02	98 e main	FIRST	18	В	WALL			Brick	CRACKED	Null	0.01 ± 0.03	ing / cm ^2	
479	2015-07-16 12:02	98 e main	FIRST	18	в	DOOR			METAL	CRACKED	Null	$0,29 \pm 0.47$	mg / cm ^2	
480	2015-07-16 12:02	98 e main	FIRST	18	в	DOOR	Case		METAL	CRACKED	Negative	0.05 ± 0.14	mg / cm ^2	
481	2015-07-16 12:03	98 e main	FIRST	81	в	flue			METAL	CRACKED	Null	0.80 ± 0.50	mg / cm ^2	
482	2015-07-16 12:03	98 e main	FIRST	18	В	DOOR			METAL	CRACKED	Negative	0.01 ± 0.05	mg / cm ^2	
483	2015-07-16 12:03	98 e main	FIRST	18	в	DOOR	case		METAL	CRACKED	Negative	0.01 ± 0.04	mg / cm ^2	
484	2015-07-16 12:03	98 e main	FIRST	18	в	WALL			Brick	CRACKED	Positive	10.10 ± 7.20	mg/cm^2	
485	2015-07-16 12:04	98 e main	FIRST	18	в	WINDOW			WOOD	CRACKED	Positive	32.80 ± 31.30	mg/cm^2	
486	2015-07-16 12:04	98 e main	FIRST	18	D	DOOR			WOOD	CRACKED	Negative	0.04 ± 0.10	mg / cm ^2	
487	2015-07-16 12:04	98 e main	FIRST	18	D	DOOR	:case		WOOD.	CRACKED	Negative	0.03 ± 0.07	mg / cm ^2	
488	2015-07-16 12:05	98 e main	FIRST	19	С	WALL			CONCRETE	CRACKED	Positive	19.00 ± 16.80	mg/cm^2	
489	2015-07-16 12:06	98 e main	FIRST	19	C	WINDOW			WOOD	CRACKED	Posltive	16.30 ± 14.50	mg/cm^2	
490	2015-07-16 12:06	98 e main	FIRST	61	C	CEILING			WOOD	CRACKED	Negative	0.40 ± 0.30	ing/cm^2	
491	2015-07-16 12:07	98 e main	FIRST	19	С	CEILING			WOOD	CRACKED	Negative	0.27 ± 0.24	mg / cm ^2	
492	2015-07-16 12:09	98 e main	FIRST	19	С	Beam	ceiling		WOOD	CRACKED	Positive	17.90 ± 14.80	mg/cm^2	
493	2015-07-16 12:09	98 e main	FIRST	19	D	WALL			CONCRETE	CRACKED	Negative	0.06 ± 0.14	mg / cm ^2	

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30	529	528	527	526	525	524	523	522	521	520	519	518	517	516	515	514	513	512	511	510	509	508	507	506	505	504	503	502	501	500	499	498	497	496	495	494	Index
2015-07-16 12:28	2015-07-16 12:28	2015-07-16 12:27	2015-07-16 12:27	2015-07-16 12:27	2015-07-16 12:25	2015-07-16 12:25	2015-07-16 12:25	2015-07-16 12:23	2015-07-16 12:23	2015-07-16 12:23	2015-07-16 12:21	2015-07-16 12:20	2015-07-16 12:19	2015-07-16 12:19	2015-07-16 12:19	2015-07-16 12:19	2015-07-16 12:18	2015-07-16 12:18	2015-07-16 12:17	2015-07-16 12:17	2015-07-16 12:17	2015-07-16 12:16	2015-07-16 12:16	2015-07-16 12:15	2015-07-16 12:15	2015-07-16 12:15	2015-07-16 12:15	2015-07-16 12:14	2015-07-16 12:14	2015-07-16 12:13	2015-07-16 12:12	2015-07-16 12:12	2015-07-16 12:12	2015-07-16 12:10	2015-07-16 12:10	2015-07-16 12:09	Time
98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	98 e main	Site				
FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	FIRST	Floor
23	23	23	23	23	23	23	23	22	22	22	22	22	22	22	22	22	21	21	21	21	21	20	20	20	20	20	20	20	20	20	20	20	20	19	19	19	Room
				С	C	C	С	D	D	Ð	С	D				C	в	в	в	в	в							в	В	В	D	D	Α	A	A	D	Side
stair	stair	stair	WALL	WALL	DOOR	DOOR	WALL	Floor	beam	CEILING	DOOR	WINDOW	DOOR	DOOR	WALL	WALL	FLOOR	DOOR	DOOR	BASEBOARD	WALL	COLUMN	FLOOR	BASEBOARD	DOOR	DOOR	WALL	Beam	CEILING	WALL	FLOOR	WALL	WALL	FLOOR	WALL	COLUMN	Component
stringer	riser	tread			case				ceiling				case					case							Case			ceiling									Mise 1
																																					Mis
																																				- 1	c 2
WOOD	WOOD	WOOD	WOOD	Brick	METAL	METAL	CONCRETE	WOOD	WOOD	GOOM.	WOOD	WOOD	METAL	METAL	DRYWALL	DRYWALL	WOOD			WOOD	DRYWALL	WOOD	:WOOD	WOOD	METAL	METAL	DRYWALL	WOOD	WOOD	CONCRETE	WOOD	WOOD	CONCRETE	WOOD	DRYWALL	WOOD	c 2 Substrate
WOOD CRACKED	WOOD CRACKED	WOOD CRACKED	WOOD CRACKED	Brick CRACKED	METAL CRACKED	METAL	CONCRETE CRACKED	WOOD CRACKED	WOOD CRACKED	WOOD CRACKED	WOOD CRACKED	WOOD CRACKED	METAL CRACKED	METAL CRACKED	DRYWALL CRACKED	DRYWALL CRACKED	WOOD CRACKED	CRACKED	CRACKED	WOOD CRACKED	DRYWALL CRACKED	WOOD CRACKED	WOOD CRACKED	WOOD CRACKED	METAL CRACKED	METAL CRACKED	DRYWALL CRACKED	WOOD CRACKED	WOOD CRACKED	CONCRETE CRACKED	WOOD CRACKED	WOOD CRACKED	CONCRETE CRACKED	WOOD CRACKED	DRYWALL CRACKED	WOOD CRACKED	c 2 Substrate Condition
WOOD CRACKED Negative	WOOD CRACKED Negative	WOOD CRACKED Negative	WOOD CRACKED Negative	Brick CRACKED Negative	METAL CRACKED Negative	METAL CRACKED Negative	CONCRETE CRACKED Null	WOOD CRACKED Negative	WOOD CRACKED Positive	WOOD CRACKED Positive	WOOD CRACKED Negative	WOOD CRACKED Negative	METAL CRACKED Negative	METAL CRACKED Negative	DRYWALL CRACKED Negative	DRYWALL CRACKED Negative	WOOD CRACKED Negative	CRACKED Negative	CRACKED Negative	WOOD CRACKED Negative	DRYWALL CRACKED Negative	WOOD CRACKED Positive	WOOD CRACKED Negative	WOOD CRACKED Negative	METAL CRACKED Negative	METAL CRACKED Null	DRYWALL CRACKED Negative	WOOD CRACKED Positive	WOOD CRACKED Positive	CONCRETE CRACKED Negative	WOOD CRACKED Negative	WOOD CRACKED Null	CONCRETE CRACKED Null	WOOD CRACKED Negative	DRYWALL CRACKED Negative	WOOD CRACKED Positive	c 2 Substrate Condition Results
WOOD CRACKED Negative 0.04 ± 0.06	WOOD CRACKED Negative 0.00 ± 0.02	WOOD CRACKED Negative 0.04 ± 0.11	WOOD CRACKED Negative 0.40 ± 0.50	Brick CRACKED Negative 0.12 ± 0.12	METAL CRACKED Negative 0.10 ± 0.06	METAL CRACKED Negative 0.09 ± 0.28	CONCRETE CRACKED Null 1.20 ± 0.40	WOOD CRACKED Negative 0.00 ± 0.02	WOOD CRACKED Positive 26.20 ± 19.80	WOOD CRACKED Positive 3.30 ± 2.20	WOOD CRACKED Negative :0,02 ± 0.08	WOOD CRACKED Negative 0.00 ± 0.02	METAL CRACKED Negative 0.00 ± 0.02	METAL CRACKED Negative 0.00 ± 0.02	DRYWALL CRACKED Negative 0.00 ± 0.02	DRYWALL CRACKED Negative 0.00 ± 0.02	WOOD CRACKED Negative 0.09 ± 0.17	CRACKED Negative 0.00 ± 0.02	CRACKED Negative :0.00 ± 0.02	WOOD CRACKED Negative 0.00 ± 0.02	DRYWALL CRACKED Negative 0.00 ± 0.02	WOOD CRACKED Positive :19.50 ± 16.30	WOOD CRACKED Negative 0.05 ± 0.16	WOOD CRACKED Negative 0.00 ± 0.02	METAL CRACKED Negative 0.00 ± 0.02	METAL CRACKED Null 0.00 ± 0.02	DRYWALL CRACKED Negative :0.00 ± 0.02	WOOD CRACKED Positive 9.70 ± 8.30	WOOD CRACKED Positive 14,10 ± 10,90	CONCRETE CRACKED Negative 0.05 ± 0.08	WOOD CRACKED Negative 0.00 ± 0.02	WOOD CRACKED Null 0.00 ± 0.03	CONCRETE CRACKED Null 0.03 ± 0.10	WOOD CRACKED Negative :0.08 ± 0.09	DRYWALL CRACKED Negative 0.00 ± 0.02	WOOD CRACKED Positive 7,20 ± 5,30	c 2 Substrate Condition Results PbC

49. Woodside, Street ... Stamford, CT. 06902

98 E. Main St. Rockville, CT

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49. Woodside Street., Stamford, CT, 06902

98 E. Main St. Rockville, CT

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49. Woodside Street. Stamford, CT.06902

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Page 14 of 14

Environmental Consultants And Laboratory Services



(203) 324-2222 Fax (203) 324-9857

49 Woodside Street Stamford, CT 06902

July 27, 2015

GZA Geoenvironmental Attn. Jim Hutton

RE: Lead TCLP testing 98 East Main Street Vernon, CT (Rockville)

To Whom It May Concern:

HYGENIX conducted an XRF lead based paint inspection at the above mentioned site on July 15, 2015. Mr. Hutton also requested testing of 5 building materials with high XRF readings for further testing via lead TCLP (Toxicity Characteristic Leaching Procedure).

I collected composite samples of the five building materials mentioned below. The five samples were sent overnight to Schneider Laboratories in Richmond Virginia where they were analyzed by EPA Method 6010C / 1311 (TCLP). The results of the analysis were as follows:

MATERIAL	RESULT	EPA LEVEL
Interior brick composite	1.04 mg/L	5.0 mg/L
Interior concrete / plaster composite	0.508 mg/L	5.0 mg/L
Window wood composite	126 mg/L	5.0 mg/L
Door wood and exterior trim composite	119 mg/L	5.0 mg/L
Interior ceiling, beam, and column composite	61.8 mg/L	5.0 mg/L

According to EPA RCRA (Resource Conservation and Recovery Act) and CT DEP standards, construction waste having TCLP lead levels exceeding 5.0 mg/L are classified as "hazardous waste". Waste streams (i.e., all of the demolition materials mixed together) with TCLP lead content greater than 5.0 mg/l require special handling. The wood window, door / exterior trim, and ceiling, beam, and column samples all had TCLP lead content greater than the 5 mg/l standard – therefore **care must be taken in how these materials are handled and disposed**.

If there are any questions, comments or concerns please do not hesitate to reach me at rebenhack@hygenix.com or (203) 324-2222 x11. Thank-you.

Sincerely

Ryan Ebenhack HYGENIX, Inc. Connecticut Lead Inspector #2167

Attachments: Lead TCLP laboratory results

Attn:

Project:

Analysis Report

Schneider Laboratories Global, Inc

2512 W. Cary Street • Richmond, Virginia • 23220-5117 804-353-6778 • 800-785-LABS (5227) • Fax 804-359-1475

Customer: HYGENIX, INC. (117) 49 Woodside St Address: Stamford, CT 06902

98 E Main St

136218 Order #: Matrix Received Reported

TCLP 07/20/15 07/23/15

-Location: Number:			Р	O Number:	Eber	hack	
Sample ID Parameter	Cust. Sample ID	Location Method	Result	RL*	Units	Analysis Date	Analyst
136218-001	R1	Brick					
Metals An	alysis		4.04	0.200	ma/l	07/23/15	OHE
Lead		EPA 7000B71311	1.04	0.200		07/24/15	W/T
Initial pH		EPA 1311	6.60		ph Units	07/21/15	VVI
Post pH		EPA 1311	1.45		pH Units	07/21/15	VV I
136218-002	R2	Concrete/Plaster					
Metals An Lead	alysis	EPA 7000B / 1311	0.508	0.200	mg/L	07/23/15	OHE
Initial pH		EPA 1311	9.78		pH Units	07/21/15	WT
Post pH		EPA 1311	1.59		pH Units	07/21/15	WT
136218-003	R3	Window Wood					
Metals An	alysis					07/00/45	
Lead		EPA 7000B / 1311	126	4.00	mg/L	07123/15	
Initial pH		EPA 1311	4.37		pH Units	07/21/15	WT
136218-004	R4	Door Wood					
Metals An	alysis					07/00/45	
Lead		EPA 7000B / 1311	119	4.00	mg/L	07/23/15	UHE
(nitial pH		EPA 1311	4.82		pH Units	07/21/15	WT
136218-005	R5	Ceiling & Beam Wood					
Metals Ar Lead	nalysis	EPA 7000B / 1311	61.8	2.00	mg/L	07/23/15	OHE
MS failed o	lue to interference.				all Unite	07/21/15	\A/T
Initial pH		EPA 1311	5.00		pH Units	07/21/15	VV)
Post pH		ÉPA 1311	1.43		pH Units	07/21/15	VVI

136218-07/23/15 01:13 PM

Math H. Sail

Reviewed By: Marti Baird Analyst

All internal QC parameters were met. Unusual sample conditions, if any, are described. Surrogate Spike results designated with "D" indicate that the analyte was diluted out. "MI" indicates matrix interference. Concentration and *Reporting Limit (RL) based on areas provided by client. Values are reported to three significant figures. PPM = mg/kg | PPB = μ g/kg. The test results reported relate only to the samples submitted.

SLG	Analysis Report		25 80	1 10 512 V 94-35	eid V. Ca 3-67	er iry Sf 78 • 5	Laborat treet • Richmor 800-785-LABS	tories nd, Virginia (5227) • F	Global, • 23220-5117 fax 804-359-1475	inc
Customer:	HYGENIX, INC. (117) 49 Woodside St						Order #:	13	6218	
Audress.	Stamford, CT 06902						Matrix Received	TCL 07/2	_P 20/15	
Attn:							Reported	0/12	23/15	
Project: Location: Number:	98 E Main St						PO Number:	Ebe	enhack	
Sample ID Parameter	Cust. Sample ID	Location Method			Re	esult	RL*	Units	Analysis Date	Analyst
Certificatio	ons									
Paramater	Method	Matrix	СТ	NC	PA	VA				
Lead	EPA 7000B	TCLP	Х	Х	Х	Х				
<u>Key</u>										
State CT NC	Regulatory Agend CT DPH NCDENR	cy - Lab ID			Certi PH-0 593	ficate 118	Number			
ΝΥ	INTELAP-11413				02004	-				

009

7936

'X' indicates that the analyte is accredited.

ΡA

VA

If your state is not listed above, call laboratory for accreditation/certification information.

Virginia DCLS/DEQ - 460135

PLAP 68-00968

EPA TCLP Regulatory Limits

Paramater	Reg. Limit	Unit
Lead	5.00	mg/L

All internal QC parameters were met. Unusual sample conditions, if any, are described. Surrogate Spike results designated with "D" indicate that the analyte was diluted out. "MI" indicates matrix interference. Concentration and *Reporting Limit (RL) based on areas provided by client. Values are reported to three significant figures. PPM = mg/kg | PPB = µg/kg. The test results reported relate only to the samples submitted.

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sample # R1 R2	Date Sample F/IG F/IG	Time Sampled PM PM	Sample Ider (e.g. Employee SS Brick Confect	ntification N. Bidg, Material)	Wiped Area (ft [*])	Type1 A.B.P.E	Ti Start	me ²	Start	v Rate ³ Stop	Air Vol			
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PHASE III DATA GAP INVESTIGATION REPORT FORMER DANIEL'S MILL 98 East Main Street Vernon, Connecticut

December 2019 File No. 05.0045441.06



PREPARED FOR:

Town of Vernon Vernon, Connecticut

GZA GeoEnvironmental, Inc.

95 Glastonbury Boulevard, 3rd Floor | Glastonbury, CT 06033 860-286-8900

31 Offices Nationwide www.gza.com

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GEOTECHNICAL ENVIRONMENTAL ECOLOGICAL WATER CONSTRUCTION MANAGEMENT

95 Glastonbury Boulevard 3rd Floor Glastonbury, CT 06033 T: 860.286.8900 F: 860.633.5699 www.qza.com December 13, 2019 GZA File No. 05.0045441.06

Mr. Shaun Gately Economic Development Director Town of Vernon Memorial Building 14 Park Place, 3rd Floor Vernon, Connecticut 06066-3291

Re: Phase III Data Gap Investigation Report Former Daniels's Mill Vernon, Connecticut

Dear Mr. Gately:

GZA GeoEnvironmental, Inc. (GZA), on behalf of the Town of Vernon, has prepared this Phase III Data Gap Investigation Report for the former Daniel's Mill property located at 98 East Main Street in Vernon, Connecticut (Site). The investigations described herein were designed to evaluate certain data gaps identified based on our review of the available reports and our Phase II investigation program. The results of these investigations were used to determine the nature and extent of potential releases to the environment from former Site operations, evaluate the distribution and extent of polychlorinated biphenyl (PCB) impacts within interior building materials to determine the applicability of the Toxic Substances Control Act (TSCA) and potential abatement requirements for future Site development activities. GZA also assessed whether remedial actions will be required to achieve compliance with the remedial criteria established under the Connecticut Remediation Standard Regulations (RSRs).

The work outlined herein was completed in accordance with our Agreement dated November 2, 2015 and Change Notices Nos. 4, 5, and 6 and is subject to the Terms and Conditions of our Agreement and the Limitations presented in Appendix A.

Should you have any questions, please feel free to contact the undersigned.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Benjamin D. Rach Project Manager

David Rusczyk, P

Associate Principal

Kathleen Cyr, LEP, P.E.

Consultant/Reviewer

J:_45,000-45,499\45441 Amerbelle\45441-06\Reports\Daniels Mill Investigation Summary.docx





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- FIGURE 3 SAMPLE LOCATION MAP
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1.0 INTRODUCTION

GZA GeoEnvironmental, Inc. (GZA), on behalf of the Town of Vernon, has prepared this Phase III Data Gap Investigation Report for the former Daniel's Mill property located at 98 East Main Street in Vernon, Connecticut (the "Site"). The investigations described herein were designed to evaluate certain data gaps identified based on our review of the available reports and our Phase II investigation program. The results of these investigations were used to determine the nature and extent of potential releases to the environment from former Site operations and whether remedial actions will be required to achieve compliance with the remedial criteria established under the Connecticut Remediation Standard Regulations (RSRs). The investigations outlined herein were also designed to evaluate the distribution and extent of polychlorinated biphenyl (PCB) impacts within interior building materials to determine the applicability of the Toxic Substances Control Act (TSCA)¹ to potential future Site development activities.

The scope of our Phase III data gap investigation program was developed based on our review of the following reports:

- Apex Companies LLC., Phase I Environmental Site Assessment, Daniel's Management, Inc., October 2011 (2011 Phase I ESA);
- Fuss & O'Neill, Inc., *Phase I Environmental Site Assessment*, Former Daniel's Mill, December 2014 (2014 Phase I ESA); and,
- GZA GeoEnvironmental, Inc., *Phase II Environmental Site Assessment*, September 2015 (Phase II ESA).

This report is subject to the Limitations presented in Appendix A.

2.0 BACKGROUND

Site background information was obtained from a review of the 2011 and 2014 Phase I ESAs and our Phase II ESA. This information was supplemented with a review of available on-line (CT-ECO website) geologic and groundwater classification maps published by the State of Connecticut.

2.1 SITE DESCRIPTION AND HISTORY

The Site is located at 98 East Main Street in an industrial zone of Vernon, Connecticut and consists of an approximate 1acre parcel of land about where shown on Figure 1. The Site is the location of the former Daniel's Mill, which was built in approximately 1855. The Site is improved with a six-story (including basement and attic) historical mill building with a footprint measuring approximately 9,000 square-feet. The north side of the Site building is located approximately 8 to 10 feet off the edge of East Main Street. Several underground storage tanks (USTs) which appear to have been installed within a concrete vault(s) are present within the narrow strip of land between the East Main Street sidewalk and the building. Areas to the west of the Site building are currently predominantly asphalt paved. A narrow-grassed area is located to the east of the building. The Hockanum River runs from east to west through the abutting former Amerbelle Textile Mill property in a stone lined raceway and discharges to the American Mill Pond located adjacent to the south and west of the Site. Historically, a portion of the river was diverted through the Daniel's Mill building via a raceway pipe to provide power to the former mill facility.

¹ TSCA is federal legislation used to regulate the manufacture, use, distribution, storage and disposal of certain substances. For this Site, 40 CFR 761 specifically regulates PCBs.



The Site is abutted by East Main Street to the north, the former Amerbelle Textile Mill to the east, American Mill Pond to the south and west, and by a former industrial facility to the west. The Site was most recently serviced by municipal water and sanitary sewer, natural gas, and electric services; however, the water service has been shut-off since the building is vacant and the building is no longer being heated.

A locus plan showing the Site location and surrounding topographic features is presented in Figure 1 and a Site plan depicting pertinent features is presented in Figure 2.

The Site was reportedly developed as a textile mill which manufactured cotton, stockinet, and wool products between 1855 and 1951. After 1951, the Site was occupied by several different tenants as follows:

Year	Name	Description
1951-1978	Albi Manufacturing Company	Producer of fire-retardant paints and mastic
1952-1971	Double B Products	Producer of insecticides and paints.
1960	Conversion Chemical Corporation	No description in previous reports
1960-1970	Outboard Shop & Sports Center	No description in previous reports
1985-2000	Hockanum Salvage, Inc.	No description in previous reports
1985	C&C Products Inc.	No description in previous reports
1985	Furnace Brokers	No description in previous reports

The 2014 Phase I ESA indicates the Site building was most recently occupied by Band Room & Studio Rentals, Sol Cantor Electric, AI Enterprises (sheet metal workshop), Daniel's Mill Self Storage and Charity Storage in the 2014 timeframe. However, the building is currently vacant.

2.2 PHYSIOGRAPHIC SETTING

The Site is located within the Hockanum River Valley in the northeastern portion of Vernon, Connecticut. The land surface rises steeply to the north and south of the Site. Land to the east of the Site is relatively flat while the ground surface drops away steeply to the west. The elevation of the ground surface at the Site drops off steeply from approximately elevation 466 feet Mean Sea Level (MSL) to elevation 430 MSL (southwest) along the edges of the American Mill Pond which borders the Site to the south and west.

2.3 BEDROCK AND SURFICIAL GEOLOGY

The *Surficial Materials Map of Connecticut, USGS* (Stone, et. al., 1992) indicates that glacial ice-laid deposits consisting of glacial till are present at the Site. In general, overburden materials were observed to consist of sands and silts with various amounts of gravel, cobbles and boulders encountered at depth. Foreign materials, such as glass, brick, and asphalt fragments were observed in shallow soils at several borings indicating the historical placement of fill at the Site at thicknesses up to 15-feet in the southeastern portion of the Site. The thickness of the overburden materials (above bedrock) was found to vary across the Site, from less than 2 feet beneath the basement of the building to 20 feet below grade in the southeastern (at monitoring well MW-2) and southwestern (monitoring well MW-1) portions of the Site. According to the *Bedrock Geological Map of Connecticut* (Rodgers, Yale University, 1985), bedrock beneath the Site is mapped as the Glastonbury Gneiss, consisting of light-colored medium to coarse grained, well foliated, granitic gneiss.



2.4 HYDROGEOLOGY

Groundwater in the Site area is classified by the Connecticut Department of Energy and Environmental Protection (CTDEEP) as GB, which indicates that the groundwater may not be suitable for human consumption due to spills, waste discharges, or other land use impacts. According to the *Water Quality Classifications Map Vernon* (CTDEEP, October 2018), the nearest drinking water supply well is located approximately 3 miles to the southwest of the Site.

GZA's field observations indicated that depth to groundwater ranged from approximately 19 feet below ground surface (bgs) on the west side of the Site building to approximately 32 feet bgs on the east side of the Site building and the surface of the groundwater table at the Site appears to be at or below the bedrock surface. Based on Site topography and GZA's depth to groundwater measurements, groundwater is inferred to flow to the southwest toward American Mill Pond. The American Mill Pond is classified by the State of Connecticut as a Class B Surface Water (CTDEEP, 2013). Such inland surface waters are known or presumed to be suitable for the following designated uses: recreational use, fish and wildlife habitat, agricultural and industrial supply, and other legitimate uses (CTDEEP, 2013).

2.5 SUMMARY OF PREVIOUS INVESTIGATIONS

The 2011 Phase I ESA identified the following 8 Recognized Environmental Conditions (RECs) that could have resulted in the release of hazardous substances or petroleum products at the Site:

- 1. Historic Site usage as former fireproof paint, wax and insecticide manufacturers
- 2. 1,000-gallon aboveground storage tank (AST) located within northeast corner of basement
- 3. Twelve (12) 425-gallon ASTs located on an exterior concrete platform
- 4. Former 1,000-gallon UST located beneath collapsed building
- 5. Two former 2,000-gallon USTs located beneath the loading dock
- 6. Exterior 4,000-gallon UST located along the northern portion of building
- 7. Potential USTs located along northern portion of building
- 8. Abutting Brownfield Site

The 2014 Phase I ESA identified the following 7 RECs associated with the Site:

- 1. Former Furnace & Fuel-Oil AST Area (basement)
- 2. Former Floor Drain (basement)
- 3. Historical AST Storage Area
- 4. Former/Current USTs
- 5. Loading Dock
- 6. Former Pad-Mounted Transformer
- 7. Urban Fill

According to the 2014 Phase I ESA, "activities that would qualify the facility as an "establishment" have not been identified." However, the 2014 Phase I ESA further indicates, wastes may have been generated at the Site prior to the promulgation of the Resource Conservation and Recovery Act (RCRA) in 1976.

After reviewing the findings in the 2011 and 2014 Phase I ESA reports, GZA prepared a consolidated list of RECs for the Site. Note certain RECs identified in the Phase I ESAs were combined by GZA due to their proximity to one another and their similarity in operations. The following RECs were assessed as part of GZA's Phase II investigations in July and August 2015.


- 1. REC 1 Parking lot (urban fill)
- 2. REC 2 Two former fuel oil USTs below former loading dock
- 3. REC 3 Loading dock
- 4. REC 4 Six former/current USTs along northern side of the Site building
- 5. REC 5 Former boiler and AST in northwest corner of basement
- 6. REC 6 Historic use of the building
- 7. REC 7 Former exterior solvent ASTs (on platform adjacent to elevator)
- 8. REC 8 Former transformer area

The locations of these RECs are shown on Figure 3. In addition to these RECs, Site groundwater quality was evaluated during the Phase II investigation program

GZA's Phase II investigation program included the performance of 20 borings, the collection and analysis of 15 soil samples, the collection and analysis of 3 sub-soil vapor samples, collection and analysis of 1 ambient indoor air sample, the installation of 2 groundwater monitoring wells, and the collection and analysis of 2 groundwater samples. Table 1 describes each REC, the conceptual mechanisms for potential releases of contaminants to the environment for each REC, indicates whether a release was detected to the environment during the Phase II investigations, and whether the release exceeded the numeric criteria within the RSRs. The following provides a brief summary of GZA's Phase II subsurface testing program:

- Fill materials were identified below, west, and east of the Site building. These fill materials were found to contain trace concentrations of metals and polycyclic aromatic hydrocarbons (PAHs). Fill materials on the eastern side of the Site appear to be impacted with PCBs, PAHs and metals (arsenic and lead) at concentrations above the Industrial/Commercial Direct Exposure Criteria (I/C-DEC) and the GB Pollutant Mobility Criteria (GB-PMC) (PAHs only).
- A release of PCBs and volatile organic compounds (VOCs) was detected in shallow soils just below pavement within REC-3 (western loading dock). The VOC impacts were below the RSR criteria and the PCB concentration in one soil sample (B-2, 0.5-2') was above the Residential Direct Exposure Criteria (R-DEC) of 1 mg/kg.
- A release of trimethylbenzenes from one or more of the USTs (REC-4) located between East Main Street and the Site building was identified. The sample was collected from a boring within the basement of the building in an inferred downgradient direction from the USTs at a depth of 6 to 6.5 feet below the basement floor. The detected trimethylbenzene concentrations were below the numeric RSR criteria.
- VOCs and PAHs were detected in sub-slab soil samples from certain borings located in the basement of the Site building (REC-6) at concentrations below the numeric RSR criteria but indicative of a release to the environment. Extractable total petroleum hydrocarbons (ETPH) were also detected in sub-slab soils and the detected ETPH concentration in one of the samples exceeded the R-DEC of 500 mg/kg. PCBs were detected beneath the basement floor of the Site building at concentrations ranging from 0.8 mg/kg to 91 mg/kg. The detected PCB concentrations in 3 samples were above the R-DEC of 1 mg/kg and in 2 samples also above the I/C-DEC of 10 mg/kg. The detected VOC, PAH, ETPH and PCB impacts appear to indicate releases from historic Site operations have impacted soils below the basement floor of the building.
- VOC, metals (arsenic, copper, and lead), and PAHs impacts were identified in Site groundwater at monitoring well MW-2, east of the Site building. The metals concentrations were above the numeric Surface Water Protection Criteria (SWPC).



The detected VOC and PAH impacts were below the numeric RSR criteria. Dieldrin impacts were also noted in groundwater samples from both monitoring wells MW-1 (west of the Site building) and MW-2 but at concentrations below the numeric RSR criteria.

As indicated in Table 1, the Phase II subsurface testing program did not identify evidence of releases to Site soil within REC-1, REC-2, REC-5, REC-7, and REC-8.

3.0 PHASE III SCOPE OF WORK

The objectives of our Phase III data gap investigation program were as follows:

- Evaluate the extent and degree of the identified soil impacts at RECs-3, 4 and 6. Subsequent to the performance of the Phase II investigation program, these release areas were renamed as Area of Concern-3 (AOC-3), AOC-4, and AOC-6;
- 2) Further evaluate Site groundwater quality;
- 3) Assess the size of the USTs on the north side of the building and the methods used to install them; and,
- 4) Evaluate PCB concentrations in sub-slab soils and interior building materials (i.e., concrete flooring, wood flooring, and paint).

3.1 TEST BORINGS AND SOIL SAMPLING

Between 2017 and 2019, GZA advanced 56 soil borings at the Site using either a GeoProbe[®] direct-push unit or portable, hand-held sampling equipment. Boring locations are shown on Figure 3. The recovered soil samples were observed in the field by GZA's staff for indicators of a release (e.g., staining, discoloration and/or odors) and grain size descriptions of the samples were recorded using a modified Burmister soil classification system. Soil samples were placed in clean glass jars and field screened for organic vapors with a photo-ionization detector (PID). Soil sample grain size descriptions, field observations and PID field screening readings were recorded on soil boring logs presented in Appendix B of this report.

The soil borings were advanced to depths ranging from 1 to 23 feet bgs. GZA notes, at many boring locations below the Site building, sampler refusal was encountered on the presumed bedrock surface. Exposed bedrock is present in the northeast corner of the basement. Subsurface materials generally consisted of fill containing fine to coarse sands and silts with varying degrees of gravel, cobbles and boulders. Debris observed in fill materials included asphalt fragments, brick and glass as noted on the soil boring logs in Appendix B.

Representative soil samples were placed in certified clean containers supplied by the analytical laboratory and preserved in accordance with the analytical methodology. All soil samples were placed on ice in coolers and submitted under chain of custody control to Phoenix Laboratories (Phoenix) of Manchester, Connecticut, a Connecticut Department of Health Services certified environmental laboratory, for analysis of one or more of the following parameters:

- VOCs via EPA Method 8260 and leachable VOCs via Methods 1312 (SPLP method)/8260B;
- Total PAHs via EPA Method 8270D and leachable PAHs via Methods 1312/8270D;
- ETPH via the Connecticut Department of Health Services methodology;
- Total and SPLP arsenic and lead using EPA Methods 6010, 7471 and 1312; and
- PCBs via EPA Method 3540 (manual soxhlet extraction)/8082.



Chain of custody control was maintained for the samples until they were received by the laboratory. Laboratory analytical reports and chain of custody records for the soil samples are provided in Appendix C. Soil analytical results are summarized in Tables 3A, 3B, 3D, and 3E.

3.2 GROUNDWATER SAMPLING

GZA sampled groundwater from existing bedrock monitoring wells MW-1 and MW-2 to further assess groundwater quality at the Site. Prior to sampling, GZA measured and recorded the depth to groundwater within each well. Groundwater was sampled using peristaltic or bladder pumps with the end of the sampler positioned at the approximate midpoint of the saturated portion of the well screen. Groundwater was purged from the well prior to collecting a sample following EPA low stress/low flow sampling procedures. Under these procedures, groundwater was extracted from the wells at low flow rates that would induce a minimum amount of groundwater drawdown (<0.3 feet) and create minimum turbidity (<5 NTUs) during sampling.

Groundwater quality parameters (oxidation reduction potential [ORP], dissolved oxygen, temperature, specific conductivity, and pH) were monitored during purging within an enclosed flow-through cell using a YSI 556 water quality meter. The turbidity of the purged groundwater was also measured outside the cell using a Micro TPI turbidity meter. Turbidity and water quality parameters were measured at approximately 3 to 5-minute intervals until field parameter readings were stable following EPA guidelines. Groundwater monitoring data was recorded on field data sheets during well purging and sampling. Copies of the field data sheets are included in Appendix D.

When groundwater monitoring parameters were shown to have reached stable conditions, samples were collected at a constant low flow extraction rate. The samples were placed in certified clean pre-preserved containers supplied by the laboratory, placed in coolers on ice, chilled to approximately 4° C and submitted under chain of custody control to Phoenix for analysis of one or more of the following parameters: VOCs via EPA Method 8260, PAHs using EPA Method 8270D, and select metals using EPA Method 6010². Chain of custody control was maintained for the samples from collection until delivery to the laboratory.

Table 5 summarizes the laboratory results for the groundwater samples. Copies of the laboratory reports with sample chains of custody records are presented in Appendix E.

3.3 BUILDING MATERIALS SAMPLING

GZA collected two rounds of samples of building materials to assess the presence and distribution of PCBs within the interior of the building. A total of 120 samples were collected from concrete and wood flooring, wood beams and columns, wood ceilings, wood trusses, mastics, brick and masonry surfaces, plaster surfaces, and paints. Samples were collected in ½-inch increments using concrete hammer drills or wood boring drill bits with the exception of caulk, paint or mastic samples. Caulks, paint, and mastic samples were collected using hand-held tools. Sampling equipment was decontaminated between sampling locations to mitigate potential cross contamination.

The samples were analyzed for PCBs via EPA Method 3540 (manual soxhlet extraction)/8082. The analytical results are summarized in Table 6 and the laboratory analytical reports for the building materials testing are presented in Appendix F.

² Metals include arsenic, barium, cadmium, chromium, copper, and lead.



4.0 SUMMARY OF PHASE III DATA GAP INVESTIGATIONS AND COMPARISON TO THE REMEDIATION STANDARD REGULATIONS (RSRs)

The following sections evaluates the results of our Phase III data gap investigation program in the context of the RSRs. Sampling locations are shown on Figure 3. The results of laboratory analyses of samples collected during this investigation are presented in Tables 3A, 3B, 3C, 3D, 3E, and 5. Boring logs documenting subsurface conditions encountered are included in Appendix B. Copies of laboratory analytical reports for soil samples are included in Appendix C and groundwater reports are in Appendix E.

4.1 AOC 3: LOADING DOCK

In 2015, GZA completed two borings (B-1 and B-2) to depths of approximately 14.5 and 20.5 feet bgs, respectively, immediately adjacent to this loading dock. Both borings were drilled to refusal (presumed to be the top of the bedrock surface). One shallow sample from directly below the asphalt pavement from each boring (0.5 to 2 feet bgs) was submitted to the laboratory for VOC, PAHs, ETPH, PCBs, metals (total and leachable) and pesticide analysis. Boring B-2 was also advanced into bedrock to a depth of 32 feet bgs and converted to a bedrock monitoring well (MW-1).

Pesticides, PAHs, and ETPH were not detected in the two soil samples at concentrations above the analytical reporting limit. In the boring B-2 sample, toluene was detected at a concentration of 0.0057 mg/kg, below the R-DEC and GB-PMC. VOCs were not detected in the sample from boring B-1. Metals (arsenic, barium, chromium, copper, lead, and mercury) were detected in the samples from both borings but at concentrations below the R-DEC. Leachable lead was detected in the sample from boring B-2 at a concentration of 0.015 mg/L below the GB-PMC of 0.15 mg/L. PCBs were also detected at a concentration of 6 mg/kg in the sample from boring B-2 above the R-DEC of 1 mg/Kg. PCBs were not detected in the sample from boring B-1.

Based on these results, a release of VOCs and PCBs was identified proximate to this loading dock and further investigations were necessary to assess the potential source and the degree and extent of impacts in the vicinity of the loading dock.

Phase III Investigations

Two rounds of Phase III investigations were performed within AOC-3. During the first round, GZA performed borings B-21 through B-24 in the vicinity of the loading dock area. As indicated on Figure 3, borings B-21, B-22, and B-24 were performed to the west, south, and north of boring B-2 to evaluate the lateral extent of the VOC and PCB impacts in this area and boring B-23 was performed adjacent to boring B-2 to evaluate the vertical extent of the VOC and PCB impacts at boring B-2. Select soil samples from each boring were analyzed for VOCs (4 samples) and PCBs (5 samples).

VOCs were not detected above the laboratory reporting limits in the samples tested.

PCBs were detected in samples B-22 (0.5-2') and B-23 (2-4') at concentrations of 3.1 mg/kg and 0.3 mg/kg, respectively. The detected PCB concentration in sample B-22 (0.5-2') was above the R-DEC of 1 mg/kg. PCBs were not detected above the laboratory reporting limit in the samples from borings B-21 and B-24 and a deeper sample from boring B-22 (4-6' bgs).

The second round of investigations was designed to evaluate the potential applicability of the TSCA to this area and to further evaluate the extent of PCB impacts. The second round of investigations included the performance of 7 borings (B-22A, B-22B, B-23A, B-23B, B-35, B-35A and B-58) and the collection of soil samples in 3-inches intervals for PCB analysis. As presented in Table 3A, the analytical results indicated the following:



- PCBs were detected in each of the 4 samples from adjacent borings B-22A and B-22B at concentrations ranging from 0.3 mg/kg (B-22B, 45-48") to 2.4 mg/kg (B-22A, 36-39"). The detected PCB concentrations in samples B-22A, 30-33" and B-22A, 36-39" were above the R-DEC of 1 mg/Kg.
- PCBs were detected in samples B-23A (12-15" and 21-24") at concentrations of 2.8 and 1.7 mg/kg, respectively above the R-DEC of 1 mg/kg. The deeper sample from adjacent boring B-23B (33-36") had a reported PCB concentration of 0.55 mg/kg below the R-DEC of 1 mg/kg.
- PCBs were detected in sample B-35 (10.5-13.5") at a concentration of 26 mg/kg above the I/C-DEC of 10 mg/kg. PCBs were not detected in the deeper sample from adjacent boring B-35A (21-24") above the laboratory reporting limit.
- PCBs were detected in sample B-58 (10-13") at a concentration of 0.16 mg/kg below the R-DEC of 1 mg/kg.

Findings

Based upon the results of the Phase II and III investigations, a release of VOC and PCB containing materials was identified in the vicinity of this loading dock. The detected VOC impacts were below the applicable numeric RSR criteria and no further action is proposed for the identified VOC release.

The detected PCB impacts exceeded the R-DEC and the I/C-DEC (one sample) and are bounded laterally to the north by boring B-24, to the west by borings B-21 and B-58, to the east by the building, and by a retaining wall between the paved loading dock area and the steep slope down to American Mill pond to the south. We note, based on historical drawings of the facility, it appears that the loading dock in this area may have extended at one point to the southwest over 2 former USTs. The retaining wall may be remnants of the rear foundation wall for the former loading dock. The PCBs impacts extend to depths ranging from 2 feet to 4 feet bgs.

A potential source of the identified impacts within this AOC is releases of PCB and/or VOC containing materials that were formerly managed at the loading dock to the ground surface. Given this release model, the highest concentrations would be anticipated to be located directly below the asphalt pavement. However, in certain locations (B-22/B-22A, B-23/B-23A and B-35/B-35A), the highest PCB concentrations were observed approximately 10 to 39-inches bgs. Given this discrepancy in the release model, 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 USTs.

4.2 REC 4: CURRENT/FORMER USTs - NORTH SIDE OF BUILDING

The Phase I ESA reports indicated 6 USTs were present along the north side of the building between the building and East Main Street. The contents of these tanks were reported to include butyl acetate, isopropanol, butanol, No. 2 fuel oil, 2-nitropropane, and formoel. The fuel oil tank reportedly had a 6,000-gallon capacity; however, the size of the other 5 USTs are not known.

As part of our Phase II investigation, GZA completed three borings (B-15, B-16, and B-17) to depths of 3, 6.5, and 5 feet below the basement floor, respectively. Due to the limited space available for the performance of explorations proximate to the USTs, the uncertainty regarding the size of the USTs, and the presence of below grade utilities along East Main



Street, the borings were performed inside the building basement in a presumed downgradient direction from the USTs. The borings were drilled to refusal (which is inferred to be the bedrock surface). The 0.5 to 2-foot samples from borings B-15 and B-17 and a deeper sample (6 to 6.5 feet) from boring B-16 were submitted to the laboratory for VOC, PAHs, alcohols, and ETPH analysis. The deeper sample from boring B-16 was selected for analysis due to elevated field screening results and the presence of a chemical odor.

Alcohols, PAHs and ETPH were not detected in the 3 soil samples analyzed at concentrations above the laboratory reporting limit. 1,2,4 trimethylbenzene (19 mg/kg), 1,3,5 trimethylbenzene (5.2 mg/kg), and n-propylbenzene (2.5 mg/kg) were detected in the deeper sample from boring B-16. These compounds do not have promulgated RSR criteria, however concentrations were below the values CTDEEP has indicated are approvable for site-specific use as Additional Polluting Substances (APS). VOCs were not detected above the laboratory reporting limit in the samples from borings B-15 and B-17.

Phase III Investigations

In order to further evaluate the nature of the VOC detections in soil beneath the basement of the building, GZA completed boring B-16A adjacent to previous boring B-16. Boring B-16A was advanced to a depth of 6.5 feet below the basement floor before encountering refusal (which is inferred to be the bedrock surface). A soil sample from 6 to 6.5-feet was submitted to the laboratory for leachable VOC analysis via the Synthetic Precipitation Leaching Procedure (SPLP). As indicated in Table 3B, leachable VOCs were not detected in the B-16A soil sample above the laboratory reporting limit.

GZA also engaged an earthwork contractor to perform test pits on the north side of the building to expose the tops of the USTs and allow evaluation of the size of the tanks and the methods used to install them. During the performance of these test pits, the interiors of the tanks were also accessed via either cutting the fill or vent pipes with a reciprocating saw to determine whether any liquids were present. Samples were collected of the liquids from three of the tanks for analytical testing for VOCs, semi-volatile organic compounds (SVOCs), RCRA-8 metals, total organic carbon, flashpoint, and BTU content. Analytical testing results are summarized in Table 3C and the laboratory analytical data report is included in Appendix G. Upon completion of the work, the fill/vent pipes were sealed with caps.

Based on the observations made during the test pitting, it appears that the USTs are potentially staged within a concrete vault(s) with sand backfill surrounding each tank and a 4 to 5-inch thick concrete pad across the top of the USTs. However due to access constraints, GZA could not excavate along the sides of the USTs or determine whether the vault is equipped with a concrete base. A description of each tank and the amount of liquid present (if any) is as follows:

- Tank No. 1 This tank has an approximately 5-foot diameter and approximately 2-inches of liquid was present within the tank. The liquid was clear and did not have an odor. The liquid did not contain VOCs or SVOCs at concentrations above the reporting limit other than a low detection of methylene chloride (12 μg/L). The flashpoint of the liquid was greater than 200 degrees Celsius and the liquid was not flammable.
- Tank No. 2 This tank has an approximately 5-foot diameter and approximately 2-inches of liquid was present within the tank. The liquid was clear and did not have an odor. The liquid did not contain VOCs or SVOCs at concentrations above the reporting limit other than a low detection of methylene chloride (1.3 μg/L). The flashpoint of the liquid was greater than 200 degrees Celsius and the liquid was not flammable.
- Tank No. 3 This tank has an approximately 5-foot diameter and liquids were not present within the tank.



- Tank No. 4 This tank has an approximately 6-foot diameter and approximately 30-inches of liquid was present within the tank. The liquid contained a fuel oil odor.
- Tank No. 5 This tank has an approximately 5-foot diameter and liquids were not present within the tank.
- Tank No. 6 This tank has an approximately 7-foot diameter and appeared to be full of a liquid that contained a glycol odor. The liquid contained methyl ethyl ketone at a concentration of 26,000 µg/L and toluene at a concentration of 2,500 µg/L. The flashpoint of the liquid was 112 degrees Celsius and the liquid was flammable.

Findings

A release of petroleum related VOCs (trimethylbenzenes and n-propylbenzene) was detected beneath the northwestern portion of the basement of the Site building at concentrations below APS R-DEC and GB-PMC. The source of these VOC impacts is inferred to be the fuel oil UST located directly north and upgradient of the Site building; however due to access constraints and the presence of below grade utilities, it was not feasible to collect samples directly adjacent to or below the USTs. Additional sampling will be required to assess the extent of any releases from the USTs north of the Site building and the need to perform remedial activities. This sampling would be performed after the contents of the tanks are removed and the interiors of the tanks cleaned.

4.3 REC 6: HISTORIC USE OF BUILDING

Based upon a review of the Phase I reports, the Site was first developed as a textile mill and manufactured cotton, stockinet, and wool products. After the Site ceased textile operations, it was used to produce fire retardant paints and mastic and insecticides. Other past tenants at the Site include a salvage company, outboard motor center and furnace brokers. Based on historic drawings of the basement of the building, several open top, "Fixed Century" mixers, and "Hanging Lightning" mixers and a "J.H. Day" mixers were present in the basement of the building. Additional equipment/operations identified within the basement include an exhauster, an "Abbe Ball' mill, a dust collector, a hammer mill, loading points for a "Ball" mill, and a flipping area.

As part of our Phase II investigation, GZA collected 3 soil vapor samples (SV-1, SV-2 and SV-3) from beneath the basement of the building to assess the potential for the migration of impacted soil vapor into the building from releases from former Site operations or releases from upgradient sources. In addition, one ambient air sample (SV-AMB) was collected from the basement of the Site building. Soil vapor sample locations are provided on Figure 3. Chlorinated and aromatic VOCs were detected in the 3 soil vapor samples but at concentrations below the Residential Soil Vapor Volatilization Criteria (R-SVVC). Chlorinated and aromatic VOCs were also detected in the ambient air from the basement but at lower concentrations than the soil vapor samples and below the Residential Target Indoor Air Concentrations. A summary table of the soil vapor sampling results was presented in the Phase II Report.

GZA subsequently completed 14 borings (B-7 through B-20) to evaluate impacts from historical Site activities. Borings B-7 and B-8 were performed to assess soil quality on the east side of the Site near doorways that previously opened onto an alley between the Daniel's Mill property and the adjacent former Amerbelle Textile Mill property and extended to depths of 20 and 14 feet bgs, respectively. Exterior boring B-7 was also extended approximately 12 feet into bedrock so that a monitoring well could be installed at this location (MW-2). Borings B-9 through B-20 were performed beneath the basement floor and extended to depths up to 3.5 feet below the basement floor. Boring B-9 was completed in the portion of the Site building that extends to the south. Boring B-10 was performed in the southeastern portion of the basement. Boring B-11 was performed in the south-central portion of the basement proximate to an elevator. Borings B-12 through



B-17 and B-20 were drilled in the northern part of the basement proximate to concrete pedestals that likely supported former equipment. Borings B-18 and B-19 were performed in the southwestern portion of the basement proximate to above grade piping associated with a former heating oil AST and a floor drain pit. Refusal was encountered (presumably on bedrock) at each of these interior borings. We note, a bedrock outcrop extends into the northwestern portion of the building and the building foundation wall was constructed on top of the bedrock outcrop. Select soil samples were submitted to the laboratory for one or more of the following analyses VOCs, pesticides, PAHs, ETPH, metals, alcohols, and PCBs.

Soils below the basement were observed to generally consist of brown to red-brown sands, similar to the soils found in the western parking lot. Soils to the east of the Site building consisted of up to 14 feet of sandy fill containing brick and asphalt consistent with urban fill overlying sands.

VOCs, PCBs, PAHs, ETPH, and metals were detected within a sample of the fill materials from 3 to 5 feet bgs from boring B-7 to the east of the Site building. The concentrations of PCBs (11 mg/kg), certain PAHs, arsenic (16 mg/kg) and lead (781 mg/kg) exceeded the R-DEC and the concentrations of PCBs, certain PAHs, and arsenic also exceeded the I/C-DEC. PAHs were also detected above the GB-PMC. Leachable lead and arsenic via SPLP were not detected above the laboratory reporting limit. A soil sample was not submitted for analytical testing from boring B-8.

Low levels of VOCs (1,2,4-trimethylbenzenes, 1,3,5-trimeithylbenzene, xylenes, ethylbenzene, n-propylbenzene and tetrachloroethene) and benzo(g,h,i)perylene were detected in the sub-slab soil samples from borings B-10, B-11 and B-17 at concentrations below the R-DEC and the GB-PMC. Petroleum hydrocarbons were detected in 3 of the 8 soil samples analyzed from beneath the basement at concentrations ranging from 72 mg/kg to 1,100 mg/kg (B-14, 0.5-2'). The detected petroleum hydrocarbon concentration in the boring B-14 sample exceeded the R-DEC.

Various metals were also detected in the 3 sub-slab soil samples analyzed. The concentration of lead (1,190 m/kg) in sample B-19, 0.5-3' exceeded the I/C-DEC. Testing of this sample via the SPLP indicated the leachable lead concentration was below the GB-PMC.

Pesticides (3 samples) and alcohols (1 sample) were not detected above the laboratory reporting limits.

PCBs were detected in 4 of the 5 sub-slab soil samples at concentrations ranging from 0.8 mg/kg (B-19, 0.5-3') to 91 mg/kg (B-11, 0.5-2'). The detected PCB concentration in the samples from borings B-11 (91 mg/kg), B-13 (6.3 mg/kg), and B-14 (21 mg/kg) exceeded the R-DEC and the PCB concentration in the samples from borings B-11 and B-14 also exceeded the I/C-DEC.

Phase III Investigations

Based on the results of the Phase II investigations, releases were detected to sub-slab soils and to the soils to the east of the Site building and, as described below, additional investigations were performed in 2017 and 2019 to further evaluate the nature and extent of these soil impacts.

East of the Site Building

To further evaluate the detected PCB, PAH, arsenic, lead, and petroleum hydrocarbon impacts detected in soils from boring B-7, GZA performed two additional rounds of explorations east of the Site building. In 2017, three additional borings (B-25A, B-26, and B-27) were performed to evaluate the vertical and lateral extent of these impacts. PAHs were detected in



3 of the 4 samples analyzed at concentrations above the I/C-DEC and in all 4 samples at concentrations above the GB-PMC. Subsequent SPLP testing did not detect the presence of leachable PAHs.

PCBs were detected in each sample analyzed (4 samples) at concentrations ranging from 0.36 mg/kg to 8.4 mg/kg. The PCB concentration in 2 of the 4 samples exceeded the R-DEC. Arsenic was detected in 2 of the 4 samples and the detected arsenic concentration in 1 of the samples was above the I/C-DEC. Lead was detected in all 4 samples and the lead concentration in 1 of the samples was above the R-DEC. Subsequent SPLP testing indicated compliance with the GB-PMC for these two metals. During these explorations, an UST was also detected proximate to boring B-27. Petroleum hydrocarbons were detected in a soil sample directly above the UST at a concentration of 398 mg/kg below the R-DEC but indicative of a release.

In 2019, 7 additional borings (B-7A, B-25B, B-27A, B-36, B-36A, B-37, and B-37A) were performed east of the Site building. Borings B-7A, B-25B, B-27A, B-36A, and B-37A were performed to evaluate the potential applicability of TSCA to soils in this area and, given this objective, soil samples were collected from these 5 borings in 3-inch intervals. Borings B-36 and B-37 were performed to evaluate the nature and extent of the petroleum hydrocarbon, PAH, lead, and arsenic soil impacts in this area.

PAHs were detected in the 3 samples analyzed from borings B-36 and B-37. The PAH concentrations in sample B-36 (0-2') were above the I/C-DEC and GB-PMC. PAH concentrations in the deeper sample at boring B-36 (4-6') and from the surface soil sample from boring B-37 (0-1.75') were below the R-DEC and GB-PMC.

Petroleum hydrocarbons were detected in 1 of the 3 samples analyzed from borings B-36 and B-37. The petroleum hydrocarbon concentration (320 mg/kg) in the surface soil sample from boring B-36 (0-2') was below the R-DEC and GB-PMC.

Arsenic and lead were detected in the surface soil samples from borings B-36 and B-37 but at concentrations below the applicable criteria.

PCBs were reported in 11 of the 14 samples analyzed from borings B-7A, B-25B, B-27A, B-36A, and B-37A at concentrations ranging from 0.79 mg/kg (B-37A, 1.5-1.75') to 17 mg/kg (B-7A, 1.75-2'). The PCB concentrations in 8 of the samples were above the R-DEC and in 2 of the samples (B-7A, 1.75-2' and B-36A, 1.75-2') also above the I/C DEC.

Findings

PCBs were detected within the fill materials east of the Site building at concentrations ranging from 0.36 mg/kg to 17 mg/kg in sample B-7A (1.75-2'). Eleven samples had PCB concentrations above the R-DEC and 3 samples (B-7, (3-5'), B-7A (1.75-2') and B-36A (1.75-2')) had concentrations also above the I/C-DEC. These PCBs impacts are bounded laterally to the north and west by the building foundation wall and to the south by boring B-37A. These PCB impacts may extend to the east onto the adjacent former Amerbelle Textile Mill property. PCB impacts above the R-DEC extend vertically to a depth of at least 5 feet bgs at borings B-7/B-7A and B-36A. The source of these PCB impacts is potentially related to releases of materials used in the former Site manufacturing operations that were managed and/or handled at a former overhead door into the building in this area.

PAHs, arsenic and lead impacts were also detected within the fill materials east of the Site building. Similar to the PCB impacts, these impacts are bounded horizontally to the north and west by the building foundation wall and south by boring B-37. However, these impacts may also extend to the east onto the former Amerbelle Textile Mill property. Similar



to the adjacent former Amerbelle Textile Mill property, the presence of these compounds may be related to the presence of coal ash in the fill. The full vertical extent of these impacts has not been delineated due to the presence of an UST and the former raceway in this area.

Petroleum hydrocarbon impacts are also present in the fill materials in this area but at concentrations below the numeric RSR criteria. The source of these petroleum hydrocarbons could be related to an UST identified in this area.

Under the Building Basement

To further evaluate the detected sub-slab PCB soil impacts, GZA performed two additional rounds of explorations within the basement of the Site building in 2017 and 2019. The first round consisted of the performance of 9 additional borings (B-11A, B-13A, B-15A, and B-28 through B-33) and the second round consisted of the performance of 20 additional borings (B-38 through B-57) in the locations depicted on Figure 3. Sub-slab soil samples were collected on an approximately 3-meter grid like pattern; however, the grid could not be completed in the eastern portion of the basement due to the thickness of the concrete floor (greater than 15 inches at boring B-34) and the presence of a sub-slab raceway.

The concrete floor was observed to range in thickness from approximately 1-inch (B-41) to greater than 15-inches. Voids were observed directly beneath the concrete floor in 6 of the borings (B-30, B-47, B-52, B-54, B-55, and B-56). These voids ranged in thickness from 4 to 22.5 inches (B-30). The 3-inch interval directly below the floor slab or below the void was collected and analyzed for PCBs from each boring except B-30. The material below the B-30 void space consisted of gravel that precluded the collection of a soil sample.

PCBs were detected in 16 of the 27 samples analyzed from the 3-inch interval directly below the floor slab or the void space at concentrations ranging from 0.09 mg/kg (B-57, 5.5-8.5") to 11 mg/kg (B-51, 1-4"). The PCB concentrations in 9 of these samples exceeded the R-DEC of 1 mg/kg and 1 sample also exceeded the I/C-DEC of 10 mg/kg.

Deeper samples were collected from 7 of the 9 locations where PCBs were detected above 1 mg/kg in the sample directly below the floor slab or void space. PCBs were detected in 2 of these 7 samples at concentrations of 0.57 mg/kg and 0.52 mg/kg (B-11A, 2-2.25' and B-54, 30-33") below the R-DEC of 1 mg/kg.

Findings

PCBs were detected in sub-slab soils at concentrations ranging from 0.1 mg/kg to 91 mg/kg in sample B-11 (0.5-2'). Twelve samples contained PCB concentrations above the R-DEC and 3 samples (B-11, 0.5-2', B-14, 0.5-2' and B-51, 1-4") had PCB concentrations above the I/C-DEC. One sample contained PCBs greater than 50 mg/kg (B-11, 0.5-2'). The highest PCB concentrations were observed in the north-central portion of the basement proximate to former "Ball Mill" loading points and in the south-central portion of the basement proximate to the elevator. The vertical extent of these PCBs is generally delineated except at borings B-14, B-47 and B-56. However, based upon the results from other sub-slab soil samples, the PCB impacts appear to be generally within the upper 2-feet below the concrete floor. Based on testing of the concrete floor of the basement (see Section 5.0 below), the source of these sub-slab soil impacts appears to be related to the former manufacturing activities performed within the basement and these soils, if disturbed, would likely be classified as a PCB Remediation Waste subject to the handling and disposal requirements of the TSCA Regulations included 40 CFR 761.61.

Lead and ETPH were also found in sub-slab soils above the R-DEC and the I/C-DEC (lead only). The highest petroleum hydrocarbon impacts appear to be located proximate to the north foundation wall (boring B-14) downgradient of the USTs



located between East Main Street and the Site building. The highest lead concentration was detected proximate to a floor drain pit in the southwestern portion of the basement.

4.4 SITE GROUNDWATER

As part of our Phase II investigation, GZA installed two bedrock wells (MW-1 and MW-2) in accessible exterior locations to evaluate groundwater quality at the Site³. As shown on Figure 3, monitoring well MW-1 was installed on the western side of the Site building by the loading dock and MW-2 was installed on the eastern side of the Site building, just south of the building addition formerly used as a sheet metal shop. The steep slope between the south side of the building and the American Mill Pond precluded the installation of monitoring wells in this area.

On July 27, 2015, GZA collected groundwater samples from the 2 wells for VOC, PAH, metal, and pesticide analysis. VOCs and PAHs were not detected in the sample from monitoring well MW-1 at concentrations above the laboratory reporting limit. Chromium and barium were detected in the groundwater sample from monitoring well MW-1 but at concentrations below the SWPC.

Trace concentrations of cis-1,2-dichloroethene and tetrachloroethene (5.6 μ g/L and 2.5 μ g/L, respectively) were detected in the sample from monitoring well MW-2 but at concentrations below the Residential Groundwater Volatilization Criteria (RES-GWVC) and the SWPC. Certain PAHs were also detected in the sample from monitoring well MW-2 at concentrations ranging from 0.03 to 0.12 μ g/L and below the SWPC. Arsenic, barium, chromium, copper, and lead were detected in the sample from monitoring well MW-2. The concentration of arsenic (5 μ g/L), copper (75 μ g/L), and lead (78 μ g/L) exceeded the SWPC. GZA notes that the sample from monitoring well MW-2 was collected with a bailer due to the presence of a limited amount of water in the well at the time of sampling. This sampling methodology may have resulted in the presence of suspended solids within the sample matrix which could have resulted in an elevated bias in the reported metals concentrations.

Dieldrin (a pesticide) was also detected in samples from both wells at concentrations of 0.002 and 0.003 μ g/L, below the SWPC.

Phase III Investigations

GZA performed two additional groundwater sampling rounds on August 9, 2017 and June 11,2019 to further evaluate seasonal variations in groundwater quality at the Site and the elevated metal concentrations in the 2015 sample from monitoring well MW-2. Groundwater samples were analyzed for metals (2017 and 2019 samples) and VOCs and PAHs (2019 samples only). The results of these sampling rounds indicate the following:

- The detected metal concentrations in both the 2017 and 2019 sampling rounds were below the SWPC, and other than the concentration of lead in samples from monitoring well MW-1, the metal concentrations were lower than those detected in 2015. The detected lead concentration in monitoring well MW-1 in June 2019 was slightly higher than the concentration detected in July 2015 (< 2 µg/L in July 2015 verses 2 µg/L in June 2019).
- PAHs were not detected in the 2019 samples from samples from monitoring wells MW-1 or MW-2 at concentrations above the laboratory reporting limit.

³ Overburden materials were observed to be dry during the performance of the Phase II explorations.



VOCs were not detected in the 2019 sample from monitoring MW-1 at concentrations above the laboratory reporting limit. Cis-1,2-Dichloroethene was detected in the monitoring well MW-2 sample at a concentration (2 μg/L) below the SWPC of 6,200 μg/L.

Findings

Consistent with the topography in the vicinity of the Site, groundwater within the bedrock matrix at the Site is inferred to generally flow to the southwest towards the American Mill Pond. Groundwater flow within bedrock however is influenced by the location, orientation, and interconnection of bedrock fractures and, given the limited number of bedrock wells at the Site, local variations in groundwater flow direction are possible. This inferred flow direction indicates that the southeastern portion of the Site is located in a hydraulically downgradient direction from a portion of the adjacent former Amerbelle Textile Mill.

VOCs and PAHs were detected in Site groundwater to the east of the Site building (monitoring well MW-2). The source of these impacts is potentially related to the identified releases to the fill materials directly east of the Site building (AOC-6). However, this area is also located in a downgradient direction of an identified release of chlorinated VOCs on the former Amerbelle Textile Mill. Elevated levels of certain metals were also detected in the groundwater east of the Site building during a 2015 sampling event; however, based on additional testing in 2017 and 2019, the 2015 groundwater results appear to be biased high due to the entrainment of fines within the sample matrix.

5.0 BUILDING MATERIALS ASSESSMENT

In 2017, GZA performed a hazardous building materials assessment to evaluate the presence of PCBs in building materials. A total of 120 samples were collected from during this assessment and were analyzed for PCBs via EPA Method 3540 (manual soxhlet extraction)/8082. As presented in Table 6, the following is a breakdown of the number and type of building material samples:

- Wood Flooring 35 Samples
- Concrete Flooring 15 Samples
- Wood Beams 10 Samples
- Wood Ceiling 12 Samples
- Wood Columns 5 Samples
- Wood Truss 2 Samples
- Mastic Material 1 Sample
- Brick 8 Samples
- Plaster- 10 Samples
- Masonry Material 4 Samples
- Paint 16 Samples
- Glazing 2 Samples

All but one of the 120 building material samples were found to contain PCBs. PCB concentrations ranged from 0.1 mg/kg to 254 mg/kg (in wood ceiling sample PCB-2-1-26 on the first floor). PCBs were detected above 1 mg/kg in 88 of the samples and above 50 mg/kg in 24 of the samples. The following table provides a breakdown of the range of detected PCB concentrations by material and by floor:



MATERIAL DESCRIPTION	PCB CONCENTRATIO	N RANGE (PPM)					
1 ST FLOOR	Low	High					
Wood Floor	0.6	93.2					
Concrete Floor	18.6	18.6					
Wood Beam	1.3	3					
Wood Column	4.6	4.6					
Wood Ceiling	0.9	254					
Brick	0.2	0.2					
Plaster	0.5	0.5					
Masonry Wall	0.1	0.1					
Paint	63.8	63.8					
2 ND FLOOR							
Wood Floor	0.5	26.9					
Concrete Floor	5.1	133					
Wood Beam	1.6	6.2					
Mastic	46.2	46.2					
Wood Ceiling	2.2	11.7					
Brick	0.3	4.1					
Plaster	4.4	4.4					
Paint	17	37.4					
3 RD FLOOR							
Wood Floor	2	88.5					
Concrete Floor	79.3	79.3					
Wood Beam	0.3	0.6					
Wood Column	18.4	18.4					
Wood Ceiling	0.5	3.7					
Brick	0.5	0.5					
Masonry Wall	0.2	0.2					
Plaster	0.1	0.6					
Glazing	5.5	5.5					
Paint	32.1	102					
4 [™] FLOOR							
Wood Floor	0.4	56.3					
Wood Beam	0.4	1.6					
Wood Column	2.6	2.6					
Wood Ceiling	0.7	2.6					
Brick	<0.1	0.2					
MATERIAL DESCRIPTION	PCB CONCENTRATIO	N RANGE (PPM					
4 [™] FLOOR (Continued)							
Plaster	0.6	0.9					
Glazing	171	17.1					
Paint	61.4	140.3					



MATERIAL DESCRIPTION	PCB CONCENTRATIO	ON RANGE (PPM)				
5TH FLOOR						
Wood Floor	1.4	29.1				
Wood Truss	0.4	0.5				
Wood Ceiling	0.3	0.3				
Brick	0.5	0.5				
Plaster	0.8	0.8				
Paint	61.5	163				
BASEMENT						
Concrete Floor	0.8	50.9				
Wood Beam	6.1	17.1				
Wood Column	28.7	96.4				
Wood Ceiling	3.9	35.4				
Brick	9	9				
Masonry Foundation	0.1	0.3				
Plaster	6.2	12.6				
Paint	11.8	67.4				

PCBs were detected within non-painted surfaces including the wood flooring, wood ceilings, concrete flooring, brick, plaster, wood beams, and wood columns on each floor of the building. These impacts appear to be related to releases and/or spills associated with the former operations/activities at the Site which include the production of fire-retardant paints and mastic (1950 to 1978 timeframe) and the production of insecticides and paints (1952 to 1971 timeframe). Since the source of the PCB impacts appear to be releases/spills from operations/activities prior to 1978 and the as-found PCB concentrations are greater than 50 mg/kg, these materials would be classified as a PCB Remediation Waste subject to the handling and disposal requirements of the TSCA Regulations included 40 CFR 761.61 if the building was to be renovated or demolished.

PCBs were also detected in paints throughout the building at concentrations above 50 mg/kg. It is unclear whether these paints were manufactured with PCBs or whether the PCB paint impacts were the result of spills or releases from the former operations/activities at the Site. If the paints were manufactured with PCBs, the paints would be classified as a PCB Bulk Product Waste subject to the handling and disposal requirements of the TSCA Regulations included 40 CFR 761.62 which provides more flexibility with respect to disposal. If the PCB paint impacts were however the result of spills/releases from former Site operations/activities, the paint would then be classified as a PCB Remediation Waste. PCBs were also detected in the substrate materials beneath the painted surfaces (wood beams, wood columns, wood ceilings, brick, and plaster) at varying concentrations but in general less than 50 mg/kg. These PCB impacted substrates would be classified similar to the overlying paints provided they were managed as a single unit. If paints were separately managed, the underlying PCB impacted substrates would be PCB remediation wastes.

PCBs were also detected in the limited number of window glazing samples at concentrations up to 17.1 mg/kg. This material was likely manufactured with PCBs and would be classified as an Excluded PCB Product.

6.0 CONCLUSIONS AND RECOMMENDATIONS

GZA completed a Phase III Data Gap Investigation program at the former Daniel's Mill property located at 98 East Main Street in Vernon, Connecticut. This investigation program was designed to evaluate certain data gaps identified based on



our review of a 2011 Phase I ESA, a 2014 Phase I ESA, and our Phase II investigation program. The results of these investigations were used to determine the nature and extent of potential releases to the environment from former Site operations and whether remedial actions will be required to achieve compliance with the remedial criteria established under the RSRs. These investigations were also designed to evaluate the distribution and extent of PCB impacts within interior building materials to determine the applicability of TSCA and potential abatement requirements for future Site development activities. Table 4 presents the Phase III data gap investigation program, including whether a release has occurred and if the release has been fully delineated.

The Phase III Data Gap Investigation program was completed between August 2017 and June 2019 and included the performance of 56 soil borings and the analysis of 79 soil samples from AOCs-3, 4, and 6; the assessment of the contents of and the methods used to install 6 USTs on the north side of the building; and the collection and analysis of 2 rounds of groundwater samples. The Phase III program also included the collection and analysis of 120 samples of interior building materials. The following summarizes the results of our Phase III subsurface testing program and provides our opinion whether remedial actions will be necessary to comply with the RSRs and TSCA.

AOC-3: Loading Dock

A release of VOC and PCB containing materials was identified in the vicinity of this loading dock. The detected VOC impacts were below the applicable numeric RSR criteria and no further action is proposed for the identified VOC release.

The detected PCB impacts exceeded the R-DEC and the I/C-DEC (one sample) and are bounded laterally to the north by boring B-24, to the west by borings B-21 and B-58, to the east by the building, and by a retaining wall between the paved loading dock area and the steep slope down to American Mill pond to the south. The PCBs impacts extend to depths ranging from 2 feet to 4 feet bgs. A potential source of the identified PCB impacts is releases of PCB containing materials that were formerly managed at the loading dock to the ground surface.

Remedial actions will be required to address these identified PCB soil impacts and to comply with the RSRs

AOC-4: Current/Former USTs – North Side of Building

Six USTs are located within a narrow strip of the property directly north of the Site building. Two of the tanks contained approximately 2-inches of unknown liquid, one tank contained approximately 30-inches of a liquid that appeared to be fuel oil, and another tank contained approximately 84-inches of a flammable liquid. The tanks appear to be staged within a concrete vault(s) that is backfilled with sand; however, we were not able to access whether the vaults have a bottom due to the limited space between the USTs and the building and the presence of below grade utilities adjacent to East Main Street.

A release of petroleum related VOCs was detected beneath the northwestern portion of the basement of the Site building at concentrations below the RSR criteria in an inferred downgradient direction from the fuel oil UST. However, additional sampling will be required to access the extent of any releases from the USTs north of the Site building and the need to perform remedial activities. This sampling would be performed after the contents of the tanks are removed and the interiors of the tanks cleaned.



AOC-6: Historic Use of Building – Exterior Area East of the Site Building

PCBs were detected within the fill materials east of the Site building at concentrations up to 17 mg/kg and above the R-DEC and the I/C-DEC. These PCBs impacts are bounded laterally to the north and west by the building foundation wall and to the south by boring B-37A. These PCB impacts may extend to the east onto the adjacent former Amerbelle Textile Mill property. PCB impacts above the R-DEC extend vertically to a depth of at least 5 feet bgs; however, the vertical extent of these impacts was not determined due to the presence of an UST and the former raceway. The source of these PCB impacts is potentially related to releases of materials used in the former Site manufacturing operations that were managed and/or handled at a former overhead door into the building in this area.

PAHs, arsenic and lead impacts were also detected within the fill materials east of the Site building. Similar to the PCB impacts, these impacts are bounded horizontally to the north and west by the building foundation wall and south by boring B-37 and may also extend to the east onto the former Amerbelle property. Similar to the adjacent former Amerbelle Textile Mill property, the presence of these compounds may be related to the presence of coal ash in the fill. The full vertical extent of these impacts has not been delineated due to the presence of an apparent fuel oil UST identified in this area and the former raceway.

Remedial actions will be required to address the soil impacts in this area and to comply with the RSRs. The PCB, PAH, lead, and arsenic impacts appear to be commingled within the fill materials and the remedial compliance approach for this area will be driven by the PCBs. We also note based on the proximity of the property line these remedial activities may potentially need to extend onto the adjacent former Amerbelle Textile Mill property.

During the performance of these remedial activities, the identified UST in this area should be exposed, pumped out, cleaned, and either abandoned in-place or removed.

AOC-6: Historic Use of Building - Under the Building Basement

PCBs were detected in sub-slab soils at concentrations up to 91 mg/kg and above the R-DEC and the I/C-DEC. The highest PCB concentrations were observed in the north-central portion of the basement proximate to former "Ball Mill" loading points and in the south-central portion of the basement proximate to the elevator. The vertical extent of these PCBs appears to be generally within the upper 2-feet below the concrete floor. As described below, elevated concentrations of PCBs were also detected within the concrete floor of the basement and the source of these sub-slab soil impacts appears to be related to releases and/or spills associated with the former operations/activities at the Site which include the production of fire retardant paints and mastic (1950 to 1978 timeframe) and the production of insecticides and paints (1952 to 1971 timeframe). Since the source of the PCB impacts appear to be releases/spills from operations/activities prior to 1978 and the concentrations are greater than 50 mg/kg, if disturbed, the concrete floor and the underlying soil would be classified as a PCB Remediation Waste subject to the handling and disposal requirements of the TSCA Regulations included in 40 CFR 761.61.

Apparently localized lead and ETPH were also found in sub-slab soils above the R-DEC and the I/C-DEC (lead only). The highest petroleum hydrocarbon impacts appear to be located proximate to the north foundation wall (boring B-14) downgradient of the USTs located between East Main Street and the Site building. The highest lead concentration was detected proximate to a floor drain pit in the southwestern portion of the basement.

Remedial actions will be required to address the sub-slab PCB soil impacts and to comply with the RSRs and TSCA.



Site Groundwater

Consistent with the Site and regional topography, groundwater within the bedrock is inferred to flow to the southwest across the Site towards American Mill Pond. Bedrock groundwater flow however is complex and dependent on the location, orientation, and interconnection of bedrock fractures. Relatively low-level concentrations of chlorinated VOCs were detected within groundwater on the east side of the building at concentrations below the applicable regulatory criteria. Based on the inferred groundwater flow direction and the apparent lack of chlorinated VOCs within the fill materials on the east Site of the building, the source of these VOC impacts appears to be from an upgradient source likely the former Amerbelle Textile Mill. Certain metals (arsenic, lead, and copper) were also detected in groundwater on the east Site of the building during the July 2015 sampling event at concentrations above the SWPC; however, these concentrations appear to have biased high due to the entrainment of fines within the sample matrix. The detected metal concentrations were below the SWPC during two subsequent monitoring events. Low concentrations of dieldrin and PAHs were also detected in Site groundwater but at concentrations below the SWPC.

No additional actions are recommended for Site groundwater. However, post remedial groundwater monitoring will be required upon completion of the remedial soil activities within AOCs-3, 4 (if necessary), and 6.

Building Materials

PCBs were detected within interior building materials throughout the building at varying concentrations and up to 254 mg/kg from a wood ceiling sample collected on the 1st floor. Non-painted surfaces impacted with PCBs appear to be related to releases and/or spills associated with the former operations/activities at the Site which included the production of fire-retardant paints and mastic (1950 to 1978 timeframe) and the production of insecticides and paints (1952 to 1971 timeframe). Since the source of the PCB impacts appear to be releases/spills from operations/activities prior to 1978, these materials would be classified as a PCB Remediation Waste subject to the handling and disposal requirements of the TSCA Regulations included 40 CFR 761.61.

PCBs were also detected in paints at concentrations above 50 mg/kg. It is unclear whether these paints were manufactured with PCBs or whether the PCB paint impacts were the result of spills or releases from the former operations/activities at the Site. If the paints were manufactured with PCBs, the paints would be classified as PCB Bulk Product Waste subject to the handling and disposal requirements of the TSCA Regulations included 40 CFR 761.62 which provides more flexibility with respect to disposal. If the PCB paint impacts were however the result of spills/releases from former Site operations/activities, the paint would then be classified as a PCB Remediation Waste. PCBs were also detected in underlying substrate materials (wood beams, wood columns, wood ceilings, brick, and plaster) at varying concentrations. The PCB impacted substrates would be classified similar to the overlying paints so long as the paint and substrate were removed as a single unit. If paints are removed separately, the underlying substrate would require management as a PCB Remediation Waste.

PCBs were also detected in window glazing samples at concentrations up to 17. 1mg/kg. This material was likely manufactured with PCBs and would be classified as an Excluded PCB Product.

Given the premium costs associated with removal, handling and disposal of PCB Remediation and Bulk Product Wastes, the approach to address these impacted materials should be integrated into any Site development or building renovation plan. We also note some of these PCB impacted building materials could be left in place and encapsulated/sealed: however, EPA approval, air monitoring for PCB vapors, and long-term maintenance of the sealed surfaces would be required.



TABLES

Table 1 Summary of Phase II Investigation Program Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Recognized Environmental Condition (REC)	REC Description	Release Mechanism	Release Detected (yes/no)	Released Compound & RSR Exceedance
REC 1 - Parking lot (Urban Fill)	The parking lot area on the west side of the Site was filled between 1892 and 1897 according to Sanborn Map data.	Presence of poor quality fill and leaching of contaminants from fill to groundwater.	No	
REC 2 - Two former fuel oil USTs	Either one or two former USTs were reported beneath a former storage building on the west side of the building. A 1,000-gallon UST oil tank fell into American Mill Pond when a portion of the storage building collapsed in 2008. The tank was reported as empty in Town response documents.	 Release to ground surface due to overfills. Release to sub-surface soils from tank or line leaks. Infiltration to groundwater. 	No	
REC 3 - Loading Dock	A loading dock is located on the west side of the building.	Release of contaminants to the parking lot and seepage through cracks or joints to soils below. Infiltration to groundwater.	Yes	VOCs below the RSRs. PCBs above the R-DEC.
REC 4 - Former/current USTs along northern side of the Site building	Previous Phase I ESA reports by others indicate several USTs are present along the north side of the building between the building and East Main Street.	 Release to ground surface due to overfills. Release to sub-surface soils from tank or line leaks. Infiltration to groundwater. 	Yes	VOCs below the RSRs.
REC 5 - Former Boiler and AST in northwest corner of basement	A boiler and 1,000-gallon AST were formerly located in the northwest corner of the building basement.	Release of contaminants to the floor and seepage through cracks or joints to soils. Infiltration to groundwater.	No	
REC 6 - Historic use of the building	Based upon prior reports, the Site was first developed as a textile mill which manufactured cotton, stockinet, and wool products. After the Site ceased textile operations, it was used to produce fire retardant paints and mastic and insecticides. Other tenants at the Site have been a salvage company, outboard motor center, and furnace brokers.	 Release of contaminants to the floor and seepage through cracks or joints to soils. Infiltration to groundwater. Release of contaminants to the ground surface and infiltration to groundwater. 	Yes	Interior: PCBs above the R-DEC & I/C-DEC. VOCs below RSRs. ETPH above R-DEC. Exterior: PAHs above R-DEC, I/C-DEC and GB-PMC. PCBs above the I/C-DEC. Arsenic above R-DEC and I/C-DEC. Lead above R-DEC and I/C-DEC.
REC 7 - Former exterior solvent ASTs	Twelve 425-gallon ASTs were formerly located on an exterior concrete platform on the south side of the building next to the elevator shaft. The American Mill Pond is below this platform. These tanks are no longer present.	Release of contaminants to the floor and seepage through cracks or joints thru platform. No soils below platform (only pond).	No	
REC 8 - Former Transformer Area	Transformers were formerly located outside the southwest corner of the building. These transformers were first pad-mounted but later relocated to a pole.	Release of contaminants to the ground surface and infiltration to groundwater.	No	
Site Groundwater	-	Impacts related to historic site activities.	Yes	VOCs below the RSRs. PAHs below the RSRs. Arsenic above SWPC. Copper above SWPC. Lead above SWPC.

Legend:

VOCs = Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

R-DEC = Residential Direct Exposure Criteria

I/C-DEC = Industrial/Commercial Direct Exposure Criteria

PCBs = Polychlorinated biphenyls

ETPH = Extractable Total Petroleum Hydrocarbons

AST = Aboveground Storage Tank SWPC = Surface Water Protection Criteria UST = Underground Storage Tank GB-PMC = GB Pollutant Mobility Criteria RSRs = Remediation Standard Regulations

Table 2 Monitoring Well Construction Summary and Groundwater Elevations Former Daniel's Mill 98 East Main Street Vernon, Connecticut

		PVC	Borehole	Depth to	Bedrock		Screen	Screen	Screened	Nominal Well	Screen	July	27, 2015	Augu	ist 5, 2015	Aug	gust 9, 2017	June	e 11, 2019
Monitoring Well No.	Installation Date	Elevation (feet)	Depth (feet)	Bedrock (feet)	Elevation (feet)	Screened Medium	Length (feet)	Interval (feet)	Elevation Interval	Diameter (inches)	Slot Size (inches)	Depth To Water (feet)	Groundwater Elevation (feet)	Depth To Water (feet)	Groundwater Elevation (feet)	Depth To Water (feet)	Groundwater Elevation (feet)	Depth To Water (feet)	Groundwater Elevation (feet)
MW-1	7/22/2015	83.47	32.25	20	63.47	BR	10	22.25-32.25	51.22-61.22	2	0.010	19.87	63.6	19.92	63.6	19.69	63.8	19.51	64.0
MW-2	7/22/2015	100.00	33.75	20	80.00	BR	10	23.75-33.75	66.25-76.25	2	0.010	32.84	67.2	32.66	67.3	30.93	69.1	29.45	70.6
American Mill Pond	-	77.44 (6)	-	-	-	-	-	-	-	-	-	NM	-	13.98	63.5	NM	-	NM	-

Notes:

1. BR indicates well screen is installed in bedrock.

2. Top of PVC riser pipe elevations were surveyed by GZA relative to a benchmark at MW-2 which was assigned an arbitrary elevation of 100 feet.

3. Measurements are from the top of the PVC riser pipe and top of concrete for the American Mill Pond.

4. Depth to bedrock and screened interval elevations are based on field observations and measurements made during well construction.

5. MW-1 & MW-2 were installed by GZA.

6. Measurements for the American Mill Pond were taken from the concrete platform to the west of the elevator along the pond.

Are	Area of Concern				AOC-3								
Sample ID		RSR Criteria		B-1	B-2	B-21	B-22	B-22		B-22A		B-22B	
Date				7/20/2015	7/20/2015	8/7/2017	8/7/2017	8/7/2017		6/3/2019		6/24/2019	
Depth (feet)	R-DEC	I/C-DEC	GB-PMC	0.5-2	0.5-2	0.5-2	0.5-2	4-6	6-9''	30-33''	36-39''	45-48''	
Volatile Organic Compounds (V	OCs) (mg/kg)												
1,1,1-Trichloroethane	500	1,000	40	ND<0.0049	ND<0.0044	ND<0.0048	ND<0.0042	-	-	-	-	-	
Carbon Tetrachloride	5	44	1	ND<0.0049	ND<0.0044	ND<0.0048	ND<0.0042	-	-	-	-	-	
1,2,4 Trimethylbenzene	500*	1,000*	28*	ND<0.0049	ND<0.0044	ND<0.0048	ND<0.0042	-	-	-	-	-	
1,3,5 Trimethylbenzene	500*	1,000*	28*	ND<0.0049	ND<0.0044	ND<0.0048	ND<0.0042	-	-	-	-	-	
Ethylbenzene	500	1,000	10.1	ND<0.0049	ND<0.0044	ND<0.0048	ND<0.0042	-	-	-	-	-	
n-Propylbenzene	500*	1,000*	10*	ND<0.0049	ND<0.0044	ND<0.0048	ND<0.0042	-	-	-	-	-	
Tetrachloroethene	12	110	1	ND<0.0049	ND<0.0044	ND<0.0048	ND<0.0042	-	-	-	-	-	
Toluene	500	1,000	67	ND<0.0049	0.0057	ND<0.0048	ND<0.0042	-	-	-	-	-	
Xylene	500	1,000	19.5	ND<0.0049	ND<0.0044	ND<0.0048	ND<0.0042	-	-	-	-	-	
Polychlorinated Biphenyls (PCB	s) (mg/kg)												
Aroclor 1254	1	10	NE	ND<0.36	6	ND<0.06	3.1	ND<0.05	0.57	1.2	2.4	0.3	
Aroclor 1260	1	10	NE	ND<0.36	ND<1.7	ND<0.06	ND<0.06	ND<0.05	< 0.072	< 0.36	< 0.36	< 0.07	
Total PCBs	1	10	NE	ND<0.36	6	ND<0.06	3.1	ND<0.05	0.57	1.2	2.4	0.3	
Pesticides (mg/kg)											-		
Pesticides	varies	varies	varies	ND	ND	-	-	-	-	-	-	-	
Polynuclear Aromatic Hydrocar	bons (PAHs) (1	mg/kg)											
2-Methylnapthalene	270*	1,000*	5.6*	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Acenaphthene	1,000*	2,500*	84*	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Anthracene	1,000	2,500	400	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Benzo(a)anthracene	1	7.8	1	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Benzo(a)pyrene	1	1	1	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Benzo(b)fluoranthene	1	7.8	1	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Benzo(g,h,i)perylene	8.4*	78*	1.0*	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Benzo(k)fluoranthene	8.4	78	1	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Chrysene	84*	780*	1*	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Dibenz(a,h)anthracene	1*	1*	1*	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Fluoranthene	1,000	2,500	56	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Fluorene	1,000	2,500	56	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Indeno(1,2,3-cd)Pyrene	1*	7.8*	1.0*	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Naphthalene	1,000	2,500	5.6	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Phenanthrene	1,000	2,500	40	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Pyrene	1,000	2,500	40	ND<0.25	ND<0.25	-	-	-	-	-	-	-	
Extractable Total Petroleum Hy	drocarbons (E'	TPH) (mg/kg)								1	-		
ETPH	500	2,500	2,500	ND<54	ND<53	-	-	-	-	-	-	-	
Total Metals (mg/kg)	-	•											
Arsenic	10	10	NE	1.9	3.1	-	-	-	-	-	-	-	
Barium	4,700	140,000	NE	39.2	179	-	-	-	-	-	-	-	
Cadmium	34	1,000	NE	ND<0.36	ND<0.34	-	-	-	-	-	-	-	
Chromium	100/3,900°	100/51,000°	NE	30.9	16.9	-	-	-	-	-	-	-	
Copper	2,500	76,000	NE	12.5	50.5	-	-	-	-	-	-	-	
Lead	400	1,000	NE	19.3	173	-	-	-	-	-	-	-	
Mercury	20	610	NE	ND<0.03	0.2	-	-	-	-	-	-	-	
Selenium	340	10,000	NE	ND<1.4	ND<1.4	-	-	-	-	-	-	-	
Silver	340	10,000	NE	ND<0.36	ND<0.34	-	-	-	-	-	-	-	
SPLP Metals (mg/L)										1			
Arsenic	NE	NE	0.5	-	-	-	-	-	-	-	-	-	
Barium	NE	NE	10	-	-	-	-	-	-	-	-	-	
Lead	NE	NE	0.15	-	0.015	-	-	-	-	-	-	-	

1. R-DEC is the Residential Direct Exposure Criteria

2. I/C-DEC is the Industrial/Commercial Direct Exposure Criteria

3. GB-PMC is the Class GB Pollutant Mobility Criteria

4. "*" = From the 2018 Additional Polluting Substances list (required DEEP approval)

5. "NE" = Criteria are not-established

6. "-" = Sample was not analyzed for this parameter

7. Bold and shaded indicates sample was detected above RSR Criteria.

8. Criteria for total chromium are not established. As a conservative approach, the criteria for hexavalent chromium is used.

9. Only those compounds detected are shown. For a full list of analytes tested for, refer to the analytical laboratory reports.

Table 3A Summary of Soil Analytical Data - Area of Concern 3 Former Daniel's Mill 98 East Main Street Vernon, Connecticut

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Are	a of Concern			AOC-3										
Sample ID		RSR Criteria		B-23		B-23A		B-23B	B-24	B-	35	B-35A	B-58	
Date	D DEC			8/7/2017		6/3/2019		6/24/2019	8/7/2017	6/3/2	2019	6/24/2019	6/24/2019	
Depth (feet)	R-DEC	I/C-DEC	GB-PMC	2-4	6-9''	12-15''	21-24''	33-36''	0.5-2	6-9''	10.5-13.5"	21-24''	10-13''	
Volatile Organic Compounds (V	OCs) (mg/kg)													
1,1,1-Trichloroethane	500	1,000	40	ND<0.0052	-	-	-	-	ND<0.0051	-	-	-	-	
Carbon Tetrachloride	5	44	1	ND<0.0052	-	-	-	-	ND<0.0051	-	-	-	-	
1,2,4 Trimethylbenzene	500*	1,000*	28*	ND<0.0052	-	-	-	-	ND<0.0051	-	-	-	-	
1,3,5 Trimethylbenzene	500*	1,000*	28*	ND<0.0052	_	-	-	-	ND<0.0051	-	-	-	-	
Ethylbenzene	500	1,000	10.1	ND<0.0052	-	-	-	-	ND<0.0051	-	-	-	-	
n-Propylbenzene	500*	1,000*	10*	ND<0.0052	-	-	-	-	ND<0.0051	-	-	-	-	
Tetrachloroethene	12	110	1	ND<0.0052	-	-	-	-	ND<0.0051	-	-	-	-	
Toluene	500	1,000	67	ND<0.0052	-	-	-	-	ND<0.0051	-	-	-	-	
Xylene	500	1,000	19.5	ND<0.0052	-	-	-	-	ND<0.0051	-	-	-	-	
Polychlorinated Biphenyls (PCB	s) (mg/kg)													
Aroclor 1254	1	10	NE	0.3	< 0.071	2.8	1.7	0.55	ND<0.06	0.13	26	< 0.07	0.16	
Aroclor 1260	1	10	NE	ND<0.06	< 0.071	< 0.34	< 0.56	< 0.07	ND<0.06	< 0.072	<6.8	< 0.07	< 0.069	
Total PCBs	1	10	NE	0.3	< 0.071	2.8	1.7	0.55	ND<0.06	0.13	26	< 0.07	0.16	
Pesticides (mg/kg)														
Pesticides	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	
Polynuclear Aromatic Hydrocar	bons (PAHs) (mg/kg)												
2-Methylnapthalene	270*	1,000*	5.6*	-	-	-	-	-	-	-	-	-	-	
Acenaphthene	1,000*	2,500*	84*	-	-	-	-	-	-	-	-	-	-	
Anthracene	1,000	2,500	400	-	-	-	-	-	-	-	-	-	-	
Benzo(a)anthracene	1	7.8	1	-	-	-	-	-	-	-	-	-	-	
Benzo(a)pyrene	1	1	1	-	-	-	-	-	-	-	-	-	-	
Benzo(b)fluoranthene	1	7.8	1	-	-	-	-	-	-	-	-	-	-	
Benzo(g,h,i)perylene	8.4*	78*	1.0*	-	-	-	-	-	-	-	-	-	-	
Benzo(k)fluoranthene	8.4	78	1	-	-	-	-	-	-	-	-	-	-	
Chrysene	84*	780*	1*	-	-	-	-	-	-	-	-	-	-	
Dibenz(a,h)anthracene	1*	1*	1*	-	-	-	-	-	-	-	-	-	-	
Fluoranthene	1,000	2,500	56	-	-	-	-	-	-	-	-	-	-	
Fluorene	1,000	2,500	56	-	-	-	-	-	-	-	-	-	-	
Indeno(1,2,3-cd)Pyrene	1*	7.8*	1.0*	-	-	-	-	-	-	-	-	-	-	
Naphthalene	1,000	2,500	5.6	-	-	-	-	-	-	-	-	-	-	
Phenanthrene	1,000	2,500	40	-	-	-	-	-	-	-	-	-	-	
Pyrene	1,000	2,500	40	-	-	-	-	-	-	-	-	-	-	
Extractable Total Petroleum Hyd	drocarbons (E	TPH) (mg/kg)	2 500											
EIPH	500	2,500	2,500	-	-	-	-	-	-	-	-	-	-	
Total Metals (mg/kg)	10	10	NE											
Arsenic	10	10	NE	-	-	-	-	-	-	-	-	-	-	
Barium	4,700	140,000	NE	-	-	-	-	-	-	-	-	-	-	
	34	1,000	NE	-	-	-	-	-	-	-	-	-	-	
Chromium	100/3,900	100/51,000	NE	-	-	-	-	-	-	-	-	-	-	
Copper	2,500	/6,000	NE	-	-	-	-	-	-	-	-	-	-	
Moroury	400	1,000	NE	-	-	-	-	-	-	-	-	-	-	
Selenium	20	10,000	NE	-	-	-	-	-	-	-	-	-	-	
Silver	240	10,000	NE	-	-	-	-	-	-	-	-	-	-	
SDI D Matala (ma/I)	340	10,000	INE	-	-	-	-	-	-	-	-	-	-	
Arsonic	NE	NE	0.5											
Barium		INE NE	10	-	-	-	-	-	-	-	-	-	-	
Lead		INE NE	0.15	-	-	-	-	-	-	-	-	-	-	
	INE	INE	0.13	-	-	-	-	-	-	-	-	-	-	

1. R-DEC is the Residential Direct Exposure Criteria

2. I/C-DEC is the Industrial/Commercial Direct Exposure Criteria

3. GB-PMC is the Class GB Pollutant Mobility Criteria

4. "*" = From the 2018 Additional Polluting Substances list (required DEEP approval)

5. "NE" = Criteria are not-established

6. "-" = Sample was not analyzed for this parameter

7. Bold and shaded indicates sample was detected above RSR Criteria.

8. Criteria for total chromium are not established. As a conservative

approach, the criteria for hexavalent chromium is used. 9. Only those compounds detected are shown. For a full list of analytes tested for, refer to the analytical laboratory reports.

Table 3A Summary of Soil Analytical Data - Area of Concern 3 Former Daniel's Mill 98 East Main Street Vernon, Connecticut

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Table 3BSummary of Soil Analytical Data - Area of Concern 4Former Daniel's Mill98 East Main StreetVernon, Connecticut

Are	ea of Concern				AO	C-4	
Sample ID		RSR Criteria		B-15	B-16	B-16A	B-17
Date	R-DEC	I/C-DEC	GB-PMC	7/21/2015	7/21/2015	8/8/2017	8/8/2017
Depth (feet)				0.5-2'	6-6.5'	6-6.5'	6-6.5
Volatile Organic Compounds (V	OCs) (mg/kg)	1.000	40				ND 0.0051
1,1,1-1richloroethane	500	1,000	40	ND<0.0047	ND<0.28	-	ND<0.0051
Carbon Tetrachloride	5	44		ND<0.0047	ND<0.28	-	ND<0.0051
1,2,4 Trimethylbenzene	500*	1,000*	28*	ND<0.0047	19	-	ND<0.0051
1,3,5 Trimethylbenzene	500*	1,000*	28*	ND<0.0047	5.2	-	ND<0.0051
Ethylbenzene	500	1,000	10.1	ND<0.0047	ND<0.28	-	ND<0.0051
n-Propylbenzene	500*	1,000*	10*	ND<0.0047	2.5	-	ND<0.0051
Tetrachloroethene	12	110	1	ND<0.0047	ND<0.28	-	ND<0.0051
Toluene	500	1,000	67	ND<0.0047	ND<0.28	-	ND<0.0051
Xylene	500	1,000	19.5	ND<0.0047	ND<0.28	-	ND<0.0051
SPLP VOCs (mg/L)	1	1	1			-	
Various	varies	varies	varies	-	-	ND	-
Polynuclear Aromatic Hydrocar	bons (PAHs) (mg/kg)					
2-Methylnapthalene	270*	1,000*	5.6*	ND<0.25	ND<0.24	-	ND<0.25
Acenaphthene	1,000*	2,500*	84*	ND<0.25	ND<0.24	-	ND<0.25
Anthracene	1,000	2,500	400	ND<0.25	ND<0.24	-	ND<0.25
Benzo(a)anthracene	1	7.8	1	ND<0.25	ND<0.24	-	ND<0.25
Benzo(a)pyrene	1	1	1	ND<0.25	ND<0.24	-	ND<0.25
Benzo(b)fluoranthene	1	7.8	1	ND<0.25	ND<0.24	-	ND<0.25
Benzo(g,h,i)perylene	8.4*	78*	1.0*	ND<0.25	ND<0.24	-	ND<0.25
Benzo(k)fluoranthene	8.4	78	1	ND<0.25	ND<0.24	-	ND<0.25
Chrysene	84*	780*	1*	ND<0.25	ND<0.24	-	ND<0.25
Dibenz(a,h)anthracene	1*	1*	1*	ND<0.25	ND<0.24	-	ND<0.25
Fluoranthene	1,000	2,500	56	ND<0.25	ND<0.24	-	ND<0.25
Fluorene	1,000	2,500	56	ND<0.25	ND<0.24	-	ND<0.25
Indeno(1,2,3-cd)Pyrene	1*	7.8*	1.0*	ND<0.25	ND<0.24	-	ND<0.25
Naphthalene	1,000	2,500	5.6	ND<0.25	ND<0.24	-	ND<0.25
Phenanthrene	1,000	2,500	40	ND<0.25	ND<0.24	-	ND<0.25
Pyrene	1,000	2,500	40	ND<0.25	ND<0.24	-	ND<0.25
Extractable Total Petroleum Hy	drocarbons (E	TPH) (mg/kg)					
ETPH	500	2,500	2,500	ND< 53	ND< 53	_	ND< 53
Alcohols (mg/kg)							
Alcohols	varies	varies	varies	ND	ND	_	ND

Notes:

1. R-DEC is the Residential Direct Exposure Criteria

2. I/C-DEC is the Industrial/Commercial Direct Exposure Criteria

3. GB-PMC is the Class GB Pollutant Mobility Criteria

4. "*" = From the 2018 Additional Polluting Substances list (required DEEP approval)

5. "NE" = Criteria are not-established

6. "-" = Sample was not analyzed for this parameter

7. Bold and shaded indicates sample was detected above RSR Criteria.

8. Only those compounds detected are shown. For a full list of analytes tested for, refer to the analytical laboratory reports.

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Table 3CSummary of UST Analytical Data - Area of Concern 4Former Daniel's Mill98 East Main StreetVernon, Connecticut

Area of Concern		AOC-4	
Sample ID	Tank #1	Tank #2	Tank #6
Date	12/8/2017	12/8/2017	12/8/2017
Volatile Organic Compounds (VOCs) (µg/L)			
Methylene Chloride	12	1.3	< 2,000
Methyl Ethyl Ketone	< 5.0	< 5.0	26,000
Toluene	< 1.0	< 1.0	2,500
Semi-Volatile Organic Compounds (µg/L)			
	ND	ND	ND
Total Metals (mg/L)			
Arsenic	< 0.010	< 0.040	0.045
Barium	0.217	0.048	0.041
Cadmium	0.307	0.127	< 0.010
Chromium	0.221	0.133	< 0.010
Lead	0.853	0.447	< 0.020
Mercury	< 0.002	< 0.002	< 0.002
Selenium	< 0.50	< 0.50	< 0.10
Silver	< 0.010	< 0.010	< 0.010
Miscellaneous			
Flashpoint (°F)	> 200	> 200	112
Ignitability	Passed	Passed	Failed
BTU Value (BTU/lb)	< 500	< 500	< 500
Total Organic Carbon (mg/L)	< 10	< 5	7,100

Notes:

1. "-" = Sample was not analyzed for this parameter

2. Only those compounds detected are shown. For a full list of analytes tested for, refer to the analytical laboratory reports.

3. ND = Not detected above reporting limit.

Are		AOC-6 Outside													
									Out	side	1				
Sample ID		RSR Criteria		B-7		B-7A		B-25A	B-2	25B	B-26	B-	27	B- 2	27A
Date	R-DEC	I/C-DEC	GB-PMC	7/22/2015		6/12/2019		8/9/2017	6/12/	/2019	8/9/2017	8/7/2017	8/7/2017	6/12	/2019
Depth (feet)				3-5'	0-0.25	1.75-2	2.75-3	0-1	0-0.25	0.75-1	5-6	0-2	3-5	0-0.25	1.75-2
Volatile Organic Compounds (VO	OCs) (mg/kg)		1												1
1,1,1-Trichloroethane	500	1,000	40	0.32	-	-	-	-	-	-	-	-	-	-	-
Carbon Tetrachloride	5	44	1	0.0056	-	-	-	-	-	-	-	-	-	-	-
1,2,4 Trimethylbenzene	500*	1,000*	28*	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
1,3,5 Trimethylbenzene	500*	1,000*	28*	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	500	1,000	10.1	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
n-Propylbenzene	500*	1,000*	10*	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
Tetrachloroethene	12	110	1	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
Toluene	500	1,000	67	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
Xylene	500	1,000	19.5	0.0077	-	-	-	-	-	-	-	-	-	-	-
Polychlorinated Biphenyls (PCBs	s) (mg/kg)														0.00
Aroclor 1254	1	10	NE	11	2.8	17	<0.39	8.4	1.7	0.93	0.6	4.8	0.3	8.5	<0.38
Aroclor 1260	1	10	NE	ND<1.8	<1.8	<2.1	<0.39	ND<1.2	<0.38	<0.4	ND<0.06	ND<0.06	0.06	<1.9	<0.38
Total PCBs		10	NE	11	2.8	17	<0.39	8.4	1.7	0.93	0.6	4.8	0.36	8.5	<0.38
Polynuclear Aromatic Hydrocart	oons (PAHs) (m	ng/kg)							-			ND 0.001			
2-Methylnapthalene	270*	1,000*	5.6*		-	-	-	2.22	-	-	ND<0.372	ND<0.801	ND<0.838	-	-
Acenaphthene	1,000*	2,500*	84*		-	-	-	7.08	-	-	ND<0.372	ND<0.801	ND<0.838	_	-
Anthracene	1,000	2,500	400	0.65	-	-	-	14.8	-	-	0.412	ND<0.801	1.2	-	-
Benzo(a)anthracene	1	7.8		1.4	-	-	-	43.2	-	-	1.14	1.35	4.71	-	-
Benzo(a)pyrene	l	1	1	1.9	-	-	-	37	-	-	0.983	1.4/	4.39	-	-
Benzo(b)fluorantnene		/.8		1.9	-	-	-	35.8	-	-	1.04	1.81	5.74	-	-
Benzo(g,ii,i)perylene	8.4*	78*	1.0**	1.0	-	-	-	10.3	-	-	0.430	ND<0.801	1.83	-	-
Chrysone	0.4 0/*	780*	1	1.3	-	-	-	37.9	-	-	0.899	1.33	5.82	-	-
Dibenz(a h)anthracene	04	1*	1*	0.38	-	-	-	37.0 10.3	-	-	0.233	1.30 ND~0.402	5.5 1 11	-	-
Fluoranthene	1 000	2 500	56	2.7				92.4			3.04	3.06	13		
Fluorene	1,000	2,500	56	0.28				7.07			ND<0.372	ND<0.801	ND<0.838		
Indeno(1.2.3-cd)Pyrene	1,000	7.8*	1.0*	16		_		15.9			0.42	ND<0.801	1 79		_
Naphthalene	1,000	2,500	5.6	0.64	_	_	_	5.26	-	-	ND<0.372	ND<0.801	ND<0.838	_	_
Phenanthrene	1.000	2,500	40	2.5	_	_	_	67.2	_	_	1.9	1.36	7.79	_	_
Pyrene	1,000	2,500	40	2.3	_	_	_	78.1	-	_	2.26	1.93	7.83	_	_
SPLP Polynuclear Aromatic Hyd	rocarbons (PA	Hs) (mg/kg)		2.10								100			
Various	varies	varies	varies	-	_	-	-	ND	-	-	-	-	ND	_	-
Extractable Total Petroleum Hyd	rocarbons (ET	PH) (mg/kg)	vuites					112	L				112		
ЕТРН	500	2.500	2,500	280	-	-	-	-	-	-	-	-	398	-	-
Total Metals (mg/kg)		,	,					I			I				I
Arsenic	10	10	NE	16	-	-	-	3.5	-	-	ND<2.27	ND<2.74	15.9	-	-
Barium	4,700	140,000	NE	105	-	-	-	-	-	-	-	-	-	-	-
Cadmium	34	1,000	NE	0.74	-	-	-	-	-	-	-	-	-	-	-
Chromium	100/3,900 ⁸	100/51,000 ⁸	NE	36.9	-	-	-	-	-	-	-	-	-	-	-
Copper	2,500	76,000	NE	46.5	-	-	-	-	-	-	-	-	-	-	-
Lead	400	1,000	NE	781	-	-	-	425	-	-	67.9	150	323	_	-
Mercury	20	610	NE	0.11	-	-	-	-	-	-	-	-	-	-	-
Selenium	340	10,000	NE	ND<1.4	-	-	-	-	-	-	-	-	-	-	-
Silver	340	10,000	NE	ND<0.36	-	-	-	-	-	-	-	-	-	-	-
SPLP Metals (mg/L)															
Arsenic	NE	NE	0.5	ND<0.004	_	-	-	-	-	-	-	-	< 0.025	-	-
Barium	NE	NE	10	-	-	-	-	-	-	-	-	-	-	-	-
Lead	NE	NE	0.15	ND<0.01	-	-	-	0.025	-	-	-	-	< 0.010	-	-

1. R-DEC is the Residential Direct Exposure Criteria

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3. GB-PMC is the Class GB Pollutant Mobility Criteria

4. "*" = From the 2018 Additional Polluting Substances list (required DEEP approval)

5. "NE" = Criteria are not-established

6. "-" = Sample was not analyzed for this parameter

7. Bold and shaded indicates sample was detected above RSR Criteria.

8. Criteria for total chromium are not established. As a conservative

approach, the criteria for hexavalent chromium is used.

 Only those compounds detected are shown. For a full list of analytes tested for, refer to the analytical laboratory reports.

Table 3D Summary of Soil Analytical Data - Area of Concern 6 - Exterior Area Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Are	ea of Concern			AOC-6 Outside											
	-							Out	tside						
Sample ID		RSR Criteria		B-	36			B-36A			B-37	B-3	7A		
Date	R-DEC	I/C-DEC	GB-PMC	6/12/	2019			6/12/2019			6/12/2019	6/12/	2019		
Depth (feet)				0-2	4-6	0-0.25	1.75-2	2.75-3'	4-4.25'	6-6.25	0-1.75	0-0.25	1.5-1.75		
Volatile Organic Compounds (VO	OCs) (mg/kg)		r					1							
1,1,1-Trichloroethane	500	1,000	40	-	-	-	-	-	-	-	-	-	-		
Carbon Tetrachloride	5	44	1	-	-	-	-	-	-	-	-	-	-		
1,2,4 Trimethylbenzene	500*	1,000*	28*	-	-	-	-	-	-	-	-	-	-		
1,3,5 Trimethylbenzene	500*	1,000*	28*	-	-	-	-	-	-	-	-	-	-		
Ethylbenzene	500	1,000	10.1	-	-	-	-	-	-	-	-	-	-		
n-Propylbenzene	500*	1,000*	10*	-	-	-	-	-	-	-	-	-	-		
Tetrachloroethene	12	110	1	-	-	-	-	-	-	-	-	-	-		
Toluene	500	1,000	67	-	-	-	-	-	-	-	-	-	-		
Xylene	500	1,000	19.5	-	-	-	-	-	-	-	-	-	-		
Polychlorinated Biphenyls (PCBs	s) (mg/kg)					-		-		-					
Aroclor 1254	1	10	NE	-	-	8.8	12	8.4	1.4	0.84	-	< 0.37	0.79		
Aroclor 1260	1	10	NE	-	-	<1.9	<1.9	<0.81	< 0.79	< 0.38	-	< 0.37	< 0.36		
Total PCBs	1	10	NE	-	-	8.8	12	8.4	1.4	0.84	-	< 0.37	0.79		
Polynuclear Aromatic Hydrocart	bons (PAHs) (m	ng/kg)													
2-Methylnapthalene	270*	1,000*	5.6*	0.33	< 0.23	-	-	-	-	-	< 0.25	-	-		
Acenaphthene	1,000*	2,500*	84*	0.54	< 0.23	-	-	-	-	-	< 0.25	-	-		
Anthracene	1,000	2,500	400	1.3	< 0.23	-	-	-	-	-	< 0.25	-	-		
Benzo(a)anthracene	1	7.8	1	4.7	0.29	-	-	-	-	-	0.4	-	-		
Benzo(a)pyrene	1	1	1	5.3	0.3	-	-	-	-	-	0.43	-	-		
Benzo(b)fluoranthene	1	7.8	1	5.4	0.32	-	-	-	-	-	0.38	-	-		
Benzo(g,h,i)perylene	8.4*	78*	1.0*	4.9	< 0.23	-	-	-	-	-	< 0.25	-	-		
Benzo(k)fluoranthene	8.4	78	1	4.3	0.27	-	-	-	-	-	0.38	-	-		
Chrysene	84*	780*	1*	5.1	0.33	-	-	-	-	-	0.39	-	-		
Dibenz(a,h)anthracene	1*	1*	1*	1.3	< 0.23	-	-	-	-	-	< 0.25	-	-		
Fluoranthene	1,000	2,500	56	6.3	0.53	-	-	-	-	-	0.65	-	-		
Fluorene	1,000	2,500	56	0.46	< 0.23	-	-	-	-	-	< 0.25	-	-		
Indeno(1,2,3-cd)Pyrene	1*	7.8*	1.0*	4.3	< 0.23	-	-	-	-	-	0.25	-	-		
Naphthalene	1,000	2,500	5.6	0.56	< 0.23	-	-	-	-	-	< 0.25	-	-		
Phenanthrene	1,000	2,500	40	6	0.48	-	-	-	-	-	0.42	-	-		
Pyrene	1,000	2,500	40	5.6	0.46	-	-	-	-	-	0.57	-	-		
SPLP Polynuclear Aromatic Hyd	lrocarbons (PA	Hs) (mg/kg)				•									
Various	varies	varies	varies	-	-	-	-	-	-	-	-	-	-		
Extractable Total Petroleum Hyd	lrocarbons (ET	PH) (mg/kg)	•			•									
ETPH	500	2,500	2,500	320	<49	-	-	-	-	-	<53	-	-		
Total Metals (mg/kg)		·	<u>, , ,</u>			1	1	<u>.</u>	1	1					
Arsenic	10	10	NE	2.96	-	-	-	-	-	-	1.96	-	-		
Barium	4.700	140.000	NE	-	_	-	-	-	-	-	-	-	-		
Cadmium	34	1.000	NE	_	_	-	-	-	-	-	-	_	_		
Chromium	100/3,900 ⁸	100/51,000 ⁸	NE	-	_	-	-	-	-	-	-	-	-		
Copper	2,500	76,000	NE	-	_	-	-	-	-	-	-	-	-		
Lead	400	1,000	NE	183	-	-	-	-	-	-	12.1	-	-		
Mercury	20	610	NE	-	-	-	-	-	-	-	-	-	-		
Selenium	340	10,000	NE	-	-	-	-	-	-	-	-	-	-		
Silver	340	10,000	NE	-	-	-	-	-	-	-	-	-	-		
SPLP Metals (mg/L)															
Arsenic	NE	NE	0.5	-	-	-	-	-	-	-	-	-	-		
Barium	NE	NE	10	-	-	-	-	-	-	-	-	-	-		
Lead	NE	NE	0.15	_	_	-	-	-	-	-	_	-	-		
	·					1	1	1	1	1	1				

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4. "*" = From the 2018 Additional Polluting Substances list

(required DEEP approval)

5. "NE" = Criteria are not-established

6. "-" = Sample was not analyzed for this parameter

- 7. **Bold** and shaded indicates sample was detected above RSR Criteria.
- 8. Criteria for total chromium are not established. As a conservative approach, the criteria for hexavalent chromium is used.
- 9. Only those compounds detected are shown. For a full list of analytes tested for, refer to the analytical laboratory reports.

Table 3D Summary of Soil Analytical Data - Area of Concern 6 - Exterior Area Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Are	ea of Concern			AOC-6															
											Insi	de							
Sample ID		RSR Criteria		B-10	B-11	B-11A	B-12	B-13	B-13A	B-14	B-15	B-15A	B-16	B-16A	B-17	B-19	B-28	B-29	B-31
Date	R-DEC	I/C-DEC	GB-PMC	7/21/2015	7/21/2015	8/8/2017	7/21/2015	7/21/2015	8/8/2017	7/21/2015	7/21/2015	8/8/2017	7/21/2015	8/8/2017	7/21/2015	7/21/2015	8/8/2017	8/8/2017	8/8/2017
Depth (feet)	K-DEC		GD -1 MIC	0.5-2	0.5-2	2-2.25	0.5-1.5	0.25-1	0-0.25	0.5-2	0.5-2'	0-0.25	6-6.5'	6-6.5'	0.5-2	0.5-3	0-0.25	0-0.25	0-0.25
Volatile Organic Compounds (VO	OCs) (mg/kg)	T						1				I	1						
1,1,1-Trichloroethane	500	1,000	40	ND<0.0059	ND<0.01	-	ND<0.006	ND<0.0057	-	ND<0.0059	ND<0.0047	-	ND<0.28	-	ND<0.0051	ND<0.006	-	-	-
Carbon Tetrachloride	5	44	1	ND<0.0059	ND<0.01	-	ND<0.006	ND<0.0057	-	ND<0.0059	ND<0.0047	-	ND<0.28	-	ND<0.0051	ND<0.006	-	-	-
1,2,4 Trimethylbenzene	500*	1,000*	28*	0.56	ND<0.01	-	ND<0.006	ND<0.0057	-	ND<0.0059	ND<0.0047	-	19	-	ND<0.0051	ND<0.006	-	-	-
1,3,5 Trimethylbenzene	500*	1,000*	28*	ND<0.26	ND<0.01	-	ND<0.006	ND<0.0057	-	ND<0.0059	ND<0.0047	-	5.2	-	ND<0.0051	ND<0.006	-	-	-
Ethylbenzene	500	1,000	10.1	ND<0.26	0.029	-	ND<0.006	ND<0.0057	-	ND<0.0059	ND<0.0047	-	ND<0.28	-	ND<0.0051	ND<0.006	-	-	-
n-Propylbenzene Tetrachloroothono	500*	1,000*	10*	ND<0.26	ND<0.01	-	ND<0.006	ND<0.0057	-	ND<0.0059	ND<0.0047	-	2.5	-	ND<0.0051	ND<0.006	-	-	-
Teluene	500	1.000	67	0.013	ND<0.01	-	ND<0.006	ND<0.0037	-	ND<0.0059	ND<0.0047	-	ND<0.28	-	ND<0.0051	ND<0.006	-	-	-
Yulana	500	1,000	19.5	ND<0.0039	0.123	-	ND<0.000	ND<0.0057	-	ND<0.0059	ND<0.0047	-	ND<0.28	-	ND<0.0051	ND<0.000	-	-	-
SPI P VOCs (mg/I)	500	1,000	19.5	0.0078	0.123	-	ND<0.000	ND<0.0037	-	ND<0.0039	ND<0.0047	-	ND<0.28	-	ND<0.0031	ND<0.000	-	-	-
Various	varies	varias	varias					1						ND					
Various Polychlaringtod Binhanyls (PCBs	$\sqrt{ma/ka}$	varies	varies	-	-	-	-	-	-	-	-	-	-	ND	-	-	-	-	-
Aroclor 1254	1	10	NF	ND<0.36	91	0.5	_	63	ND<0.06	21	_	ND<0.06	_	-	-	0.8	0.2	0.2	0.2
Aroclor 1260	1	10	NE	ND<0.36	< 14	0.07		< 1.8	ND<0.06	< 1.9		ND<0.06	_	-		< 0.36	0.2 ND<0.06	0.2 ND<0.06	0.2 ND<0.06
Total PCBs	1	10	NE	ND<0.36	91	0.57	_	6.3	ND<0.06	21	_	ND<0.06	_	_	_	0.8	0.2	0.2	0.2
Pesticides (mg/kg)	-	10		110 (0.50	71	0.57		0.0	112 (0.00	21		110 (0.00				0.0	0.2	0.2	0.2
Pesticides	varies	varies	varies	ND	-	-	_	ND	_	_	_	-	_	-	-	ND	_	_	-
Polynuclear Aromatic Hydrocarb	oons (PAHs) (n	ng/kg)	, unos	112				112								112			
2-Methylnapthalene	270*	1.000*	5.6*	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Acenaphthene	1,000*	2,500*	84*	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Anthracene	1,000	2,500	400	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Benzo(a)anthracene	1	7.8	1	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Benzo(a)pyrene	1	1	1	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Benzo(b)fluoranthene	1	7.8	1	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Benzo(g,h,i)perylene	8.4*	78*	1.0*	0.43	0.42	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Benzo(k)fluoranthene	8.4	78	1	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Chrysene	84*	780*	1*	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Dibenz(a,h)anthracene	1*	1*	1*	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Fluoranthene	1,000	2,500	56	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Fluorene	1,000	2,500	56	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Indeno(1,2,3-cd)Pyrene	1*	7.8*	1.0*	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Naphthalene	1,000	2,500	5.6	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Phenanthrene	1,000	2,500	40	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
Pyrene	1,000	2,500	40	ND<0.26	ND<0.38	-	ND<0.24	ND<0.25	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.26	-	-	-
SPLP Polynuclear Aromatic Hyd	rocarbons (PA	(HS) (Mg/Kg)						1				[ND : 52				
various	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	-	ND< 53	-	-	-	-
Extractable Total Petroleum Hyd	Focarbons (E 1	PH) (mg/kg)	2 500	260			ND < 52	ND < 52		1 100	ND < 52	[ND < 52		ND < 52	72			
EIFH Total Matals (mg/kg)	300	2,300	2,300	300	-	-	ND < 32	ND< 33	-	1,100	ND< 33	-	ND< 35	-	ND< 33	12	-	-	-
Arsonia	10	10	NE	2.1				2.1				[1.4			[
Barium	10	140,000	NE NE	2.1 83.8	-	-	-	62.0	-	-	-	-	-	-	-	1.4	-	-	-
Cadmium	34	1,000	NE	ND< 0.34				ND< 0.37								1.85			
Chromium	$100/3900^8$	1,000	NE	19.4	-	_		74.3					_	-		54.9			-
Copper	2 500	76 000	NE	20.4	-	-	-	24.2	_	_	_	-	-	_	-	59	_	_	_
Lead	400	1.000	NE	58.7	-	-	_	34.6	_	_	_	-	-	_	_	1.190	_	_	_
Mercury	20	610	NE	0.06	_	_	_	0.15	_	_	_	-	_	_	-	0.11	_	_	-
Selenium	340	10,000	NE	ND< 1.4	-	-	-	ND<1.5	-	_	-	-	-	-	-	ND< 1.5	-	-	-
Silver	340	10,000	NE	ND< 0.34	-	-	-	ND< 0.37	-	_	-	-	-	-	-	ND< 0.38	-	-	-
SPLP Metals (mg/L)																			
Arsenic	NE	NE	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Barium	NE	NE	10													0.021			
Lead	NE	NE	0.15	0.01		-		-	_			-	-	-	-	0.029	_		-
Alcohols (mg/kg)																			
Alcohols	varies	varies	varies	-	-	-		-	-	ND	ND	-	ND	-	ND	-	_		-
NT (

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approach, the criteria for hexavalent chromium is used.

9. Only those compounds detected are shown. For a full list of analytes

tested for, refer to the analytical laboratory reports.

10. GZ-99 is a duplicate sample of B-56.

Table 3E Summary of Soil Analytical Data - Area of Concern 6 - Interior Area Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Are	ea of Concern										AOC-6	I							
											Inside								
Sample ID		RSR Criteria		B-32	B-33	B-38	B-39	B-40	B-41	B-42	B	-43		B-44	B-45	B	-46	B-47	B-48
Date				8/8/2017	8/8/2017	6/3/2019	6/3/2019	6/3/2019	6/3/2019	6/3/2019	6/3/	/2019	(5/3/2019	6/3/2019	6/3/	2019	6/3/2019	6/3/2019
Depth (feet)	R-DEC	I/C-DEC	GB-PMC	0-0.25	0-0.25	7-10''	6-9''	4-7''	1-4''	7-10"	3-6''	15-18"	0-3"	12.5-15.5"	5.5-8.5''	4-7''	16-19"	8-11''	4-7''
Volatile Organic Compounds (V	OCs) (mg/kg)	•			·	·		•	·	•				•	•		·		
1,1,1-Trichloroethane	500	1,000	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon Tetrachloride	5	44	1	-	_	_	_	-	_	-	-	-	-	-	_	-	-	_	-
1.2.4 Trimethylbenzene	500*	1.000*	28*	_	_	_	_	_	_	-	-	_	-	-	_	-	-	_	-
1.3.5 Trimethylbenzene	500*	1.000*	28*	_	_	_	_	_	_	_	-	_	-	_	_	_	-	_	_
Ethylbenzene	500	1.000	10.1	_	_	_	_	_	_	-	-	_	-	_	_	-	-	_	-
n-Propylbenzene	500*	1.000*	10*	_	_	_	_	_	_	-	-	_	-	-	_	-	-	_	-
Tetrachloroethene	12	110	1	_	_	_	_	_	_	-	-	_	-	-	_	-	-	_	-
Toluene	500	1.000	67	_	_	_	_	_	_	_	-	-	-	-	_	_	-	_	-
Xvlene	500	1.000	19.5	_	_	_	_	_	_	_	_	_	_	_	_	_	-	_	-
SPLP VOCs (mg/L)		7									1	1	<u>I</u>				1		
Various	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Polychlorinated Binhenyls (PCBs	$(m\sigma/k\sigma)$	Valles	vuites				1												1
Aroclor 1254	1	10	NE	ND<0.06	0.1	<0.074	<0.072	<0.073	0.29	<0.07	18	<0.35	18	<0.38	<0.074	2.1	<0.34	2	< 0.07
Aroclor 1260	1	10	NE	ND<0.06	ND<0.06	<0.074	<0.072	<0.073	<0.078	<0.07	<0.37	<0.35	<0.37	<0.30	<0.074	<0.37	<0.34	<0.38	<0.07
Total PCBs	1	10	NE	ND<0.06	0.1	<0.074	<0.072	<0.073	0.29	<0.07	18	<0.35	1.8	<0.38	<0.074	21	<0.34	2	<0.07
Posticidos (mg/kg)		10	NE	ND<0.00	0.1	<0.074	<0.072	<0.073	0.27	<0.07	1.0	<0.55	1.0	<0.30	<0.074	2.1	<0.34	4	<0.07
Pesticides	Varies	Varias	Varias																
Polymuoloon A romotio Hydrocork	varies		varies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
2 Mathylnanthalana	270*	1 000*	5.6*		1	1	T	T	1	T	1	1	1	T	1	1	1	1	T
	270*	1,000*	3.0 ⁴	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Anthracene	1,000	2,300	<u> </u>	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Anunacene Banzo(a)anthracana	1,000	2,300	400	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
	1	/.0	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Benzo(a)pyrelle	1		1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Benzo(g h i)perglope	1	7.0	1 0*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Denzo(k)fluorenthene	0.4 ⁺	70.	1.0*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chrysono	0.4	790*	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dibonz(a h)anthracana	04	1*	1*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fluorenthone	1.000	2 500	1 [.]	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fluorana	1,000	2,300	56	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Indeno(1.2.2. ad)Pyrona	1,000	2,300	1.0*	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Naphthalana	1,000	2 500	1.0 ⁺	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Phananthrana	1,000	2,500	3.0	_	-	-	-	-	-	-	-	_	-	-	-	-	-	-	-
Puropo	1,000	2,500	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SDI D Dolymysloon A romatic Hyd	1,000	\mathbf{H}_{a} (mg/kg)	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Various	vorios	vorios	vorios																
Vallous	varies	TDII) (mg/lvg)	valles	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
ETTH		2500	2 500																
EIFN Total Matala (ma/ka)	300	2,300	2,300	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Argonia	10	10	NE		1			1		1				1					1
Barium	10	10		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cadmium	4,700	140,000	NE	-	-	-	-	-	-	+ -	-	-	-	+ -	-	-	-	-	-
Chromium	34 100/3 000 ⁸	1,000 $100/51,000^8$	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Copper	2 500	76 000		-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lead	2,300	1 000	NE	_			-	-		-	-	-	-	-	_	_	-	_	-
Mercury	20	610	NE	_	_	-	-	-	-	-	-	-	-	-	-	_	-		-
Selenium	340	10,000	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Sciencia	340	10,000	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SDI D Motols (mg/I)	540	10,000		-	-	-	-	-	-	-		-	I -		-	I -	I -	-	-
Arsenic	NE	NE	0.5							1									
Barium	NE	NE	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lead	NE	NE	0.15	-		_	-	-		-	-	-	-	_	_	_	-		-
Alcohols (mg/kg)			0.13	-	I -	-	-	I		-		-	I -	-		I –	I -	-	-
Alcohols	Vorios	Vorias	Vorias							1									
ALCOHOIS	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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- 8. Criteria for total chromium are not established. As a conservative
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- 9. Only those compounds detected are shown. For a full list of analytes tested for, refer to the analytical laboratory reports.
- 10. GZ-99 is a duplicate sample of B-56.

Table 3E Summary of Soil Analytical Data - Area of Concern 6 - Interior Area Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Area of Concern			AOC-6														
				Inside													
Sample ID		RSR Criteria		B	-49	B-50	B	-51	В	-52	B-53	B-54		B-55	B-56	GZ-99(10)	B-57
Date				6/3/	2019	6/3/2019	6/3/	/2019	6/3/	2019	6/3/2019	6/3/	2019	6/3/2019	6/3/2019	6/3/2019	6/24/2019
Depth (feet)	K-DEC	I/C-DEC	GB-PMC	4-7''	16-19"	4-7''	1-4''	13-16''	6-9''	13-16"	7-10"	18-21''	30-33''	8-11''	8-10"	8-10''	5.5-8.5
Volatile Organic Compounds (V	OCs) (mg/kg)	• •			-				- -								
1,1,1-Trichloroethane	500	1,000	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Carbon Tetrachloride	5	44	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,2,4 Trimethylbenzene	500*	1,000*	28*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
1,3,5 Trimethylbenzene	500*	1,000*	28*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Ethylbenzene	500	1,000	10.1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
n-Propylbenzene	500*	1,000*	10*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Tetrachloroethene	12	110	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Toluene	500	1,000	67	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Xylene	500	1,000	19.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SPLP VOCs (mg/L)									-	-		_	-				
Various	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Polychlorinated Biphenyls (PCB	s) (mg/kg)																
Aroclor 1254	1	10	NE	1.4	< 0.38	< 0.077	11	< 0.45	3.7	< 0.36	< 0.078	1.3	0.52	< 0.057	2.1	2.2	0.09
Aroclor 1260	1	10	NE	< 0.39	< 0.38	< 0.077	<5.9	< 0.45	< 0.54		< 0.078	< 0.33	< 0.52	< 0.057	< 0.41	< 0.36	< 0.07
Total PCBs	1	10	NE	1.4	< 0.38	< 0.077	11	< 0.45	3.7	< 0.36	< 0.078	1.3	0.52	< 0.057	2.1	2.2	0.09
Pesticides (mg/kg)																	
Pesticides	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Polynuclear Aromatic Hydrocar	bons (PAHs) (m	ng/kg)															
2-Methylnapthalene	270*	1,000*	5.6*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Acenaphthene	1,000*	2,500*	84*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Anthracene	1,000	2,500	400	-	-	-	-	-	-	`	-	-	-	-	-	-	-
Benzo(a)anthracene	1	7.8	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Benzo(a)pyrene	1	1	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Benzo(b)fluoranthene	1	7.8	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Benzo(g,h,i)perylene	8.4*	78*	1.0*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Benzo(k)fluoranthene	8.4	78	1	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chrysene	84*	780*	1*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Dibenz(a,h)anthracene	1*	1*	1*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fluoranthene	1,000	2,500	56	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Fluorene	1,000	2,500	56	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Indeno(1,2,3-cd)Pyrene	1*	7.8*	1.0*	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Naphthalene	1,000	2,500	5.6	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Phenanthrene	1,000	2,500	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Pyrene	1,000	2,500	40	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SPLP Polynuclear Aromatic Hyd	lrocarbons (PA	Hs) (mg/kg)															
Various	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Extractable Total Petroleum Hyd	lrocarbons (ET	PH) (mg/kg)															
ETPH	500	2,500	2,500	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Total Metals (mg/kg)	•	-			T	•		T		T	1	1	T	1	•	•	•
Arsenic	10	10	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Barium	4,700	140,000	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Cadmium	34	1,000	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Chromium	100/3,900 ⁸	$100/51,000^8$	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Copper	2,500	76,000	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lead	400	1,000	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Mercury	20	610	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Selenium	340	10,000	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Silver	340	10,000	NE	-	-	-	-	-	-	-	-	-	-	-	-	-	-
SPLP Metals (mg/L)								1		1			1				
Arsenic	NE	NE	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Barium	NE	NE	10	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Lead	NE	NE	0.15	-	-	-	-	-	-	-	-	-	-	-	-	-	-
Alcohols (mg/kg)																	
Alcohols	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	-	-	-	-

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7. Bold and shaded indicates sample was detected above RSR Criteria.

8. Criteria for total chromium are not established. As a conservative approach, the criteria for hexavalent chromium is used.

 Only those compounds detected are shown. For a full list of analytes tested for, refer to the analytical laboratory reports.

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Table 3E Summary of Soil Analytical Data - Area of Concern 6 - Interior Area Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Table 4 Summary of Phase III Data Gap Investigation Program Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Area of Concern (AOC)	Number of Borings/Samples Completed	Phase III Analytical List	Release Detected (yes/no)	Released Compound & RSR Exceedance	Extent of Release Fully Delineated
AOC-3: Loading Dock	7/12	PCBs	Yes	PCBs above the I/C-DEC	Yes
AOC-4: Former/current USTs along northern side of the Site building	1/1	VOCs	Yes	VOCs below R-DEC and GB-PMC.	No, impacts could not be assessed below or directly proximate to USTs.
AOC 6: Historic use of the building	28/45	PCBs, PAHs, Arsenic, Lead, ETPH	Yes	Interior: PCBs above the R-DEC & I/C-DEC. ETPH above R-DEC.	Interior: Sufficiently characterized to develop remedial approach.
				Exterior: PAHs above R-DEC, I/C-DEC and GB-PMC. Arsenic above R-DEC & I/C-DEC. Lead above R-DEC & I/C-DEC. ETPH below RSRs.	Exterior: No, impacts appear to extend laterally to east onto the adjacent former Amerbelle Mill property. Vertical extent of certain impacts could not be determined due to presence of UST and former raceway.
Site Groundwater	2 Wells	VOCs, PAHs, Pesticides, Arsenic and Lead	Yes	VOCs below the RSRs. PAHs below the RSRs. Arsenic above SWPC. Copper above SWPC. Lead above SWPC.	Yes

Legend:

VOCs = Volatile Organic Compounds

PAHs = Polycyclic Aromatic Hydrocarbons

R-DEC = Residential Direct Exposure Criteria

I/C-DEC = Industrial/Commercial Direct Exposure Criteria

PCBs = Polychlorinated biphenyls

ETPH = Extractable Total Petroleum Hydrocarbons

AST = Aboveground Storage Tank SWPC = Surface Water Protection Criteria UST = Underground Storage Tank GB-PMC = GB Pollutant Mobility Criteria RSRs = Remediation Standard Regulations

Table 5Summary of Groundwater Analytical DataFormer Daniel's Mill98 East Main StreetVernon, Connecticut

Sample ID		CT RSRs			MW-1			MW-2		TB061119
Date	SWPC	R-GWVC	I/C-GWVC	7/27/2015	8/9/2017	6/11/2019	7/27/2015	8/9/2017	6/11/2019	6/11/2019
Volatile Organic Compound	s (VOCs) (ug	/L)	-							
cis-1,2-Dichloroethene	6,200*	NE	NE	< 1.0	NA	<1.0	5.6	NA	2	<1.0
Tetrachloroethene	88	1,500	3,820	< 1.0	NA	<1.0	2.5	NA	<1.0	<1.0
Polynuclear Aromatic Hydr	ocarbons (PA	Hs) (ug/L)					-			
Benz(a)anthracene	0.3	NE	NE	< 0.02	NA	< 0.05	0.06	NA	< 0.05	NA
Benzo(a)pyrene	0.3	NE	NE	< 0.02	NA	< 0.19	0.05	NA	< 0.19	NA
Benzo(b)fluoranthene	0.3	NE	NE	< 0.02	NA	< 0.07	0.07	NA	< 0.07	NA
Benzo(k)fluoranthene	0.3	NE	NE	< 0.02	NA	< 0.28	0.03	NA	< 0.28	NA
Chrysene	0.54*	NE	NE	< 0.02	NA	< 0.47	0.04	NA	< 0.47	NA
Indeno(1,2,3-cd)pyrene	14.8	NE	NE	< 0.02	NA	< 0.09	0.03	NA	< 0.09	NA
Pyrene	110,000	NE	NE	< 0.10	NA	< 0.47	0.12	NA	< 0.47	NA
Total Metals (ug/L)	_						-			
Arsenic	4	NE	NE	< 4	<2.5	<4	5	<2.5	<4	NA
Barium	2,200*	NE	NE	240	212	NA	125	55.6	NA	NA
Cadmium	6	NE	NE	< 1	<2.5	NA	< 1	<2.5	NA	NA
Chromium	110+	NE	NE	1	<10	NA	7	<10	NA	NA
Copper	48	NE	NE	< 5	<10	NA	75	<10	NA	NA
Lead	13	NE	NE	< 2	<10	2	78	<10	4	NA
Total Pesticides (ug/L)										
Dieldrin	0.1	NE	NE	0.002	NA	NA	0.003	NA	NA	NA

Notes:

1. CT RSRs = Connecticut Remediation Standard Regulations

2. SWPC is the Surface Water Protection Criteria

3. I/C-GWVC is the Industrial Commercial Groundwater Volatilization Criteria

4. R-GWVC is the Residential Groundwater Volatilization Criteria

5. Only those compounds detected are shown. For a full list of analytes tested for, refer

to the analytical reports.

6. "*" = From the 2018 Additional Polluting Substances (requires DEEP approval)

7. "NE" = Criteria are not-established

8. Bold and shaded indicates sample was detected above RSR Criteria.

9. < 1 = Analyte not detected above detection limits

10. "+" = There are no criteria for total chromium. Criteria shown are for hexavalent chromium.

11. "NA" = Not Analyzed

					CONCENTRA	ATION (PPM) - "	ION (PPM) - TYPE PCB		
SAMPLE NUMBER	DATE SAMPLED	MATER	IAL DESCRIPTION	MATERIAL LOCATION	Arealar 1242	Anaplan 1254	Anadon 1260	Arealon 1269	Total
					Arocior 1242	Arocior 1254	Arocior 1260	Arocior 1268	PCBs
1ST FLOOR									T
PCB-1-1-23	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, first floor, southern loading dock, north overhead door, floor	ND<0.2	18.6	ND<0.2	ND<0.2	18.6
PCB-2-1-19	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 2, first floor, western hallway, northern end of hallway, floor beneath carpet	ND<9.8	93.2	ND<9.8	ND<9.8	93.2
PCB-1-1-20	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, first floor, hallway, southern side, northeast of elevator, floor	ND<5.0	26.9	ND<5.0	ND<5.0	26.9
PCB-1-1-21	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, first floor, hallway, southwest corner, floor	ND<5.0	58.6	ND<5.0	ND<5.0	58.6
PCB-1-1-22	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, first floor, electrical equipment storage room (northwest corner of building), north side, floor	ND<9.8	67.6	ND<9.8	ND<9.8	67.6
PCB-2-1-24	11/2/2017	Wood floor	Top 0.5" of 2nd layer of flooring	Building 2, first floor, western hallway, northern end of hallway, floor, under wood floor first layer (PCB-2-1-19)	ND<5.4	48.1	ND<5.4	ND<5.4	48.1
PCB-1-1-28	11/2/2017	Wood floor, 3/4-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 3/4-inch thick	Building 1, first floor, electrical equipment storage room (northwest corner of building), north side, floor, under wood floor first layer (PCB-1-1-22)	ND<0.1	8.6	ND<0.1	ND<0.1	8.6
PCB-1-1-28B	11/2/2017	Wood floor, 3-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 3-inches thick	Building 1, first floor, electrical equipment storage room (northwest corner of building), north side, floor, under wood PCB-1-1-28	ND<0.1	0.6	ND<0.1	ND<0.1	0.6
PCB-1-1-29	11/2/2017	Wood beam		Building 1 ,first floor, south side, ceiling, three windows west of elevator, under white paint	ND<0.1	3	ND<0.1	ND<0.1	3
PCB-2-1-25	11/2/2017	Wood beam		Building 2, first floor, west wall, four windows south of Building 1 entrance, under black and white paint	ND<0.1	1.4	ND<0.1	ND<0.1	1.4
PCB-1-1-31	11/2/2017	Wood column		Building 1, first floor, electrical equipment storage room, second post from door, under pink, green, and black paint	ND<0.1	4.6	ND<0.1	ND<0.1	4.6
PCB-2-1-26	11/2/2017	Wood ceiling		Building 2, first floor, west wall, ceiling, four windows south of Building 1 entrance, under white paint	ND<53.8	254	ND<53.8	ND<53.8	254
PCB-1-1-30	11/2/2017	Wood ceiling		Building 1 ,first floor, south side, ceiling, three windows west of elevator, under white paint	ND<0.1	0.8	0.1	ND<0.1	0.9
PCB-2-1-27	11/2/2017	Brick		Building 2, first floor, west wall, ceiling, four windows south of Building 1 entrance, under black paint	ND<0.1	0.2	ND<0.1	ND<0.1	0.2
PCB-1-1-32	11/3/2017	Plaster		Building 1, first floor, south wall, hallway, three windows west of elevator	ND<0.1	0.5	ND<0.1	ND<0.1	0.5
PCB-1-1-33	11/3/2017	Masonry wall		Building 1, first floor, south wall, hallway, three windows west of elevator, under PCB-1-1-32	ND<0.1	0.1	ND<0.1	ND<0.1	0.1
PCB-2-1-PAINT-1	11/2/2017	Paint, black		Building 2, first floor, west wall, fourth window south of Building 2 entrance, on wood beam	ND	50.6	13.2	ND<5.3	63.8
2ND FLOOR							•		
PCB-2-2-14	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 2, second floor, eastern hallway, northern end, middle of hallway, floor under mastic	ND<0.2	5.1	ND<0.2	ND<0.2	5.1
PCB-1-2-16	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, second floor, eastern room (machine shop), middle wall, northern end, by lathe, floor	ND<10.2	133	ND<10.2	ND<10.2	133
PCB-1-2-18	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, second floor, elevator threshold, floor	ND<0.2	19.4	ND<0.2	ND<0.2	19.4
PCB-2-2-15	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 2, second floor, western hallway, middle of hallway, middle of floor, floor	ND<5.0	26.9	ND<5.0	ND<5.0	26.9
PCB-1-2-17	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, second floor, southern wall, by entrance to Building 2, north of stairs, floor	ND<4.9	23.4	ND<4.9	ND<4.9	23.4
PCB-2-2-23	11/2/2017	Wood floor, 3-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 3-inches thick	Building 2, second floor, western hallway, middle of hallway, middle of floor, floor, under wood floor first layer (PCB-2-2-15)	ND<0.1	0.5	ND<0.1	ND<0.1	0.5
PCB-1-2-29	11/2/2017	Wood floor	Top 0.5" of 2nd layer of flooring.	Building 1, second floor, southern wall, by entrance to Building 2, north of stairs, floor, under wood floor first layer (PCB-1-2-17)	ND<0.1	0.7	ND<0.1	ND<0.1	0.7
PCB-2-2-22	11/2/2017	Wood ceiling		Building 2, second floor, middle isle, ceiling, under white paint	ND<0.1	2.2	ND<0.1	ND<0.1	2.2
PCB-1-2-25	11/2/2017	Wood ceiling		Building 1, second floor, off elevator, ceiling, under white paint	ND<0.1	8.1	3.6	ND<0.1	11.7
PCB-2-2-21	11/2/2017	Wood beam		Building 2, second floor, middle isle, ceiling, under white paint	ND<0.1	1.6	ND<0.1	ND<0.1	1.6
PCB-1-2-24	11/2/2017	Wood beam		Building 1, second floor, off elevator, under white paint	ND<0.1	4.7	1.5	ND<0.1	6.2
PCB-2-2-19	11/2/2017	Brick		Building 2, second floor, south end, under white paint	ND<0.1	0.3	ND<0.1	ND<0.1	0.3
PCB-1-2-28	11/2/2017	Brick		Building 1, second floor, brick by elevator door	ND<0.1	2.6	1.5	ND<0.1	4.1
PCB-1-2-27	11/2/2017	Plaster		Building 1, second floor, stairs to first floor, south wall, under PCB1-2-26	ND<0.1	4.4	ND<0.1	ND<0.1	4.4
PCB-1-2-26	11/2/2017	Waxy paint layer		Building 1, second floor, stairs to first floor, south wall, under brown paint	ND<2	13.8	3.2	ND<2	17
PCB-2-2-PAINT-5	8/7/2017	Paint, light green		Building 1, second floor, eastern room (machine shop), west wall, on plaster	ND	37.4	ND<5.1	ND<5.1	37.4
PCB-2-2-MASTIC	8/7/2017	Mastic		Building 2, second floor, eastern hallway, northern end, middle of hallway, floor	ND	46.2	ND<5.0	ND<5.0	46.2
PCB-1-2-26	11/2/2017	Waxy paint layer		Building 1, second floor, stairs to first floor, south wall, under brown paint	ND	13.8	3.2	ND<2	17

					CONCENTRATION (PPM) - TYPE PCB						
SAMPLE NUMBER	DATE SAMPLED	MATE	ERIAL DESCRIPTION	MATERIAL LOCATION	Aroclor 1242	Aroclor 1254	Aroclor 1260	Aroclor 1268	Total PCBs		
3RD FLOOR		- · · -					I				
PCB-1-3-13	8/7/2017		Top 0.5" - upper layer of concrete flooring	Building 1, third floor, elevator threshold, floor	ND<10.1	79.3	ND<10.1	ND<10.1	79.3		
PCB-2-3-09	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 2, third floor, eastern hallway, middle of hallway, middle of floor, floor	ND<5.0	88.5	ND<5.0	ND<5.0	88.5		
PCB-2-3-10	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 2, third floor, western hallway, middle of hallway, middle of floor, floor		8.5 21 /	ND<0.1		21 /		
PCB-1-3-11 PCB-1-3-12	8/7/2017	Wood floor	Top 0.5 - upper layer of wood flooring	Building 1, third floor, porthwestern hallway, middle of hallway, floor		74.9	ND<1.9		74.9		
PCB-1-3-14	11/2/2017	Wood floor 1-inch thick	Top 0.5" of 2nd layer of flooring 2nd layer of	Building 1, third floor, northwestern hallway, middle of hallway, floor, under wood floor first layer (PCB-1-3-12)	1	2.8	ND<0.1	ND<0.1	3.8		
	11/2/2017	wood hoor, i men thick	flooring approximately 1-inch thick		-	2.0	110 (0.1	110 (0.1	5.0		
PCB-1-3-14B	11/2/2017	Wood floor, 2-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 2-inches thick	Building 1, third floor, northwestern hallway, middle of hallway, floor, under wood floor PCB-1-3-14	0.6	1.4	ND<0.1	ND<0.1	2		
PCB-2-3-22	11/2/2017	Wood floor, 1-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 1-inches thick	Building 2, third floor, eastern hallway, middle of hallway, middle of floor, floor, under wood floor first layer (PCB-2-3-09)	ND<0.1	7.2	ND<0.1	ND<0.1	7.2		
PCB-2-3-22B	11/2/2017	Wood floor, 3-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 3-inches thick	Building 2, third floor, eastern hallway, middle of hallway, middle of floor, floor, under wood floor PCB-2-3-22	ND<0.1	2.8	ND<0.1	ND<0.1	2.8		
PCB-1-3-19	11/2/2017	Wood ceiling		Building 1, third floor, off elevator, ceiling, under grey and white paint	ND<0.1	0.5	ND<0.1	ND<0.1	0.5		
PCB-2-3-24	11/2/2017	Wood ceiling		Building 2, third floor, ceiling, central hallway by entrance to Building 1	ND<0.1	3.7	ND<0.1	ND<0.1	3.7		
PCB-2-3-23	11/2/2017	Wood beam		Building 2, third floor, central hallway by entrance to Building 1	ND<0.1	0.3	ND<0.1	ND<0.1	0.3		
PCB-1-3-18	11/2/2017	Wood beam		Building 1, third floor, off elevator, under grey and white paint	ND<0.1	0.6	ND<0.1	ND<0.1	0.6		
PCB-1-3-17	11/2/2017	Wood column		Building 1, third floor, off elevator	ND<2.2	18.4	ND<2.2	ND<2.2	18.4		
PCB-2-3-21	11/2/2017	Brick		Building 2, third floor, west wall by entrance to Building 1, under PCB-2-3-21	ND<0.1	0.3	0.2	ND<0.1	0.5		
PCB-1-3-16	11/2/2017	Masonry wall		Building 1, third floor, north wall, under PCB-1-3-15	ND<0.1	0.2	ND<0.1	ND<0.1	0.2		
PCB-1-3-15	11/2/2017	Plaster		Building 1, third floor, north wall, by PCB-1-3-14	ND<0.1	0.6	ND<0.1	ND<0.1	0.6		
PCB-2-3-20	11/2/2017	Plaster		Building 2, third floor, west wall by entrance to Building 1	ND<0.1	0.1	ND<0.1	ND<0.1	0.1		
PCB-1-3-PAINT-1	11/2/2017	Paint, brown		Building 1, third floor, north wall by PCB-1-3-14	ND	66.5	13.4	ND<5.2	79.9		
PCB-1-3-PAINT-2	11/2/2017	Paint, cream		Building 1, third floor, north wall by PCB-1-3-14	ND	102	ND<11.1	ND<11.1	102		
PCB-1-3-PAINT-3	11/2/2017 8/7/2017	Window glazing white		Building 1, third floor, wood beam by elevator Building 1, third floor, porth wall window, on window page		52.1			52.1		
	8/7/2017	window giazing, winte				5.5		ND<0.5	5.5		
PCB-2-4-04	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 2 fourth floor, eastern hallway, southern end, middle of floor, floor	ND<0.1	6.4	ND<0.1	ND<0.1	6.4		
PCB-2-4-05	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 2, fourth floor, western hallway, southern end, middle of floor, floor	ND<2.0	19.7	ND<2.0	ND<2.0	19.7		
PCB-1-4-06	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, fourth floor, east of elevator, floor	ND<9.8	56.3	ND<9.8	ND<9.8	56.3		
PCB-1-4-07	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, fourth floor, west of elevator, middle of floor, floor	ND<20	147	ND<20	ND<20	147		
PCB-1-4-08	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, fourth floor, eastern room, northwest corner, floor	ND<2.0	13.9	ND<2.0	ND<2.0	13.9		
PCB-1-4-09	11/1/2017	Wood floor, 1-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 1-inch thick	Building 1, fourth floor, east of elevator, floor, under wood floor first layer (PCB-1-4-06)	0.9	1.5	ND<0.1	ND<0.1	2.4		
PCB-1-4-09B	11/1/2017	Wood floor, 2-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 2-inches thick	Building 1, fourth floor, east of elevator, floor, under wood floor PCB-1-4-09	0.6	2.6	ND<0.1	ND<0.1	3.2		
PCB-1-4-10	11/1/2017	Wood floor, 1-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 1-inch thick	Building 1, fourth floor, west of elevator, middle of floor, under wood floor first layer (PCB-1-4-07)	0.9	5.4	ND<0.1	ND<0.1	6.3		
PCB-1-4-10B	11/1/2017	Wood floor, 2-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 2-inches thick	Building 1, fourth floor, west of elevator, middle of floor, under wood floorPCB-1-4-10	0.3	0.5	ND<0.1	ND<0.1	0.8		
PCB-1-4-14	11/1/2017	Wood ceiling		Building 1, fourth floor, north room, middle of room, ceiling	ND<0.1	1.5	1.1	ND<0.1	2.6		
PCB-2-4-18	11/1/2017	Wood ceiling		Building 2, fourth floor, east room, center of ceiling	ND<0.1	0.7	ND<0.1	ND<0.1	0.7		
PCB-1-4-13	11/1/2017	Wood beam		Building 1, fourth floor, north room, middle of room	ND<0.1	1.3	0.3	ND<0.1	1.6		
PCB-2-4-19	11/1/2017	Wood beam		Building 2, fourth floor east room, center	ND<0.1	0.4	ND<0.1	ND<0.1	0.4		
PCB-1-4-15	11/1/2017	Wood column		Building 1, fourth floor, northeast room, column	ND<0.1	2.6	ND<0.1	ND<0.1	2.6		
PCB-1-4-12	11/1/2017	Brick		Building 1, fourth floor, north wall, three windows east of northwest corner, under PCB-1-4-11	ND<0.1	ND<0.1	ND<0.1	ND<0.1			
	11/1/2017	Brick		Duniung 2, rourth 11001, northeast wall, under PCB-2-4-10 Puilding 2, fourth floor, portheast wall		0.2			0.2		
	11/1/2017	Plaster		Durining 2, rourth 11001, northeast wall Ruilding 1, fourth floor, north wall, three windows cast of porthwest corpor		0.0			0.0		
PCP-1-4-11 PCP-2-1-DAINIT 2	x1/1/201/ 8/7/2017	Fidstel Daint black		Building 2 fourth floor, north wall, on plaster		61 /			61 /		
PCR-1-Δ-ΡΔΙΝΙΤ-Λ	8/7/2017	Paint white		Building 1, fourth floor, north plaster wall, on top of green paint		60.5	ND<5.0	ND<5.0	69.5		
PCB-1-4-PAINT-5	11/1/2017	Paint white		Building 1, fourth floor, north room, ceiling, by PCB-1-4-13		33.2	19.1	ND<5.1	52.3		
PCB-1-4-PAINT-6	11/1/2017	Paint. red		Building 1, fourth floor, east room, on post	ND	68.1	66.5	ND<10.4	134.6		
PCB-1-4-PAINT-7	11/3/2017	Paint, gray		Building 1, fourth floor, entrance to large room on north side, floor	ND	112	28.3	ND<10.6	140.3		
PCB-2-4-GLAZE-1	8/7/2017	Window glazing, white		Building 2, fourth floor, east wall window, on window pane	ND	17.1	ND<0.5	ND<0.5	17.1		

					CONCENTRATION (PPM) - TYPE PCB						
SAMPLE NUMBER	DATE SAMPLED	MATER	RIAL DESCRIPTION	MATERIAL LOCATION	Aroclor 1242	Aroclor 1254	Aroclor 1260	Aroclor 1268	Total PCBs		
5TH FLOOR									1 625		
PCB-2-5-01	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 2, fifth floor, north wall, in front of tunnel, floor	ND<0.1	1.9	1	ND<0.1	2.9		
PCB-1-5-02	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, fifth floor, east wall, middle of floor, floor	ND<0.1	2.8	ND<0.1	ND<0.1	2.8		
PCB-1-5-03	8/7/2017	Wood floor	Top 0.5" - upper layer of wood flooring	Building 1, fifth floor, west of elevator, middle of floor, floor	ND<2.0	29.1	ND<2.0	ND<2.0	29.1		
PCB-1-5-04	11/1/2017	Wood floor, 1.25-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of	Building 1, fifth floor, west of elevator, middle of floor, under wood floor first layer (PCB-1-5-03)	ND<0.2	2.3	ND<0.2	ND<0.2	2.3		
			flooring approximately 1.25-inches thick								
PCB-1-5-04A	11/1/2017	Wood floor, 1-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 1-inch thick	Building 1, fifth floor, west of elevator, middle of floor, under wood floor PCB-1-5-04	ND<0.2	1.4	ND<0.2	ND<0.2	1.4		
PCB-1-5-04B	11/1/2017	Wood floor, 1.25-inch thick	Top 0.5" of 2nd layer of flooring. 2nd layer of flooring approximately 1.25-inches thick	Building 1, fifth floor, west of elevator, middle of floor, under wood floor PCB-1-5-04A	0.5	1.8	0.6	ND<0.1	2.9		
PCB-1-5-05	11/1/2017	Wood truss		Building 1, fifth floor, west truss north of elevator, under green, gray, and white paint	ND<0.1	0.5	ND<0.1	ND<0.1	0.5		
PCB-1-5-06	11/1/2017	Wood ceiling		Building 1, fifth floor, east of elevator, ceiling, under rolled asphalt roofing	ND<0.1	0.3	ND<0.1	ND<0.1	0.3		
PCB-2-5-08	11/1/2017	Wood ceiling		Building 2, fifth floor, at entrance to Building 2	ND<0.1	0.3	ND<0.1	ND<0.1	0.3		
PCB-2-5-07	11/1/2017	Wood truss		Building 2, fifth floor, at entrance to Building 1	ND<0.1	0.4	ND<0.1	ND<0.1	0.4		
PCB-1-5-10	11/1/2017	Brick		Building 1, fifth floor, west wall, under PCB-1-5-09	ND<0.1	0.4	0.1	ND<0.1	0.5		
PCB-1-5-09	11/1/2017	Plaster		Building 1, fifth floor, west wall, under white paint	ND<0.1	0.6	0.2	ND<0.1	0.8		
PCB-1-5-PAINT-1	8/7/2017	Paint, gray		Building 1, fifth floor, wood truss, north of elevator, on top of green paint	ND	61.5	ND<5.0	ND<5.0	61.5		
PCB-1-5-PAINT-2	8/7/2017	Paint, green		Building 1, fifth floor, wood truss, north of elevator, below white paint, on wood	ND	163	ND<10.2	ND<10.2	163		
BASEMENT		-					•				
PCB-1-B-24	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-31, floor	ND<4.3	39.3	ND<4.3	ND<4.3	39.3		
PCB-1-B-25	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-30, floor	ND<0.2	5.9	1.8	ND<0.2	7.7		
PCB-1-B-26	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-32, floor	ND<0.2	9.4	3.1	ND<0.2	12.5		
PCB-1-B-27	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, between boring B-31 and B-32, floor	ND<0.2	0.8	ND<0.2	ND<0.2	0.8		
PCB-1-B-28	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-33, floor	ND<0.2	9.2	ND<0.2	ND<0.2	9.2		
PCB-1-B-29	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-29, floor	ND<0.2	1.9	ND<0.2	ND<0.2	1.9		
PCB-1-B-30	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-28, floor	ND<0.2	7.8	3.3	ND<0.2	11.1		
PCB-1-B-31	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-34, floor	ND<0.2	0.8	ND<0.2	ND<0.2	0.8		
PCB-1-B11-32	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-11A, floor	ND<4.1	50.9	ND<4.1	ND<4.1	50.9		
PCB-1-B15-33	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-32A, floor	ND<4.2	38.3	ND<4.2	ND<4.2	38.3		
PCB-1-B-38	11/3/2017	Wood ceiling		Building 1, basement, ceiling, above first wood column north of elevator, under white black paint	ND<5.5	24.4	5.5	5.5	35.4		
PCB-2-B-43	11/3/2017	Wood ceiling		Building 2, basement, south end, ceiling, under grey and white paint	ND<0.1	3.2	0.7	ND<0.1	3.9		
PCB-2-B-42	11/3/2017	Wood column		Building 2, basement, middle, under white paint	2.3	21.8	2.3	2.3	28.7		
PCB-1-B-36	11/3/2017	Wood column		Building 1, basement, first wood column north of elevator, under white black paint	ND<5.1	66.2	25.1	5.1	96.4		
PCB-1-B-37	11/3/2017	Wood beam		Building 1, basement, above first wood column north of elevator, under white black paint	ND<2.2	12.7	2.2	2.2	17.1		
PCB-2-B-44	11/3/2017	Wood beam		Building 2, basement, south end, under grey and white paint	ND<0.1	5.4	0.7	ND<0.1	6.1		
PCB-2-B-39	11/3/2017	Brick		Building 2, basement, west wall be exit to exterior deck	ND<0.1	8.8	0.1	0.1	9		
PCB-1-B-34	11/3/2017	Masonry foundation		Building 1, basement, north wall, across from elevator	ND<0.1	0.1	ND<0.1	ND<0.1	0.1		
PCB-2-B-40	11/3/2017	Masonry foundation		Building 2, basement, east wall by southeast corner	ND<0.1	0.1	0.1	0.1	0.3		
PCB-1-B-35	11/3/2017	Plaster		Building 1, basement, south wall, west of elevator	ND<0.1	9.3	3.3	ND<0.1	12.6		
PCB-2-B-41	11/3/2017	Plaster		Building 2, basement, east wall by southeast corner, on masonry foundation	ND<0.1	5.7	0.7	0.1	6.5		
PCB-1-B-PAINT-1	11/3/2017	Paint, white over black		Building 1, basement, above PCB-1-B-36	ND	11.8	ND<0.1	ND<0.1	11.8		
PCB-1-B-PAINT-2	11/3/2017	Paint, white over black		Building 1, basement, above PCB-1-B-37	ND	58.5	ND<5.1	ND<5.1	58.5		
PCB-2-B-PAINT-3	11/3/2017	Paint, gray over white		Building 1, basement, above PCB-2-B-43	ND	50.9	16.5	ND<5.1	67.4		

ND = Not detected at a concentration above the laboratory's reporting limit.

Bold = Sample results exceed 1 ppm.



FIGURES



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APPENDIX C

SITE PHOTOGRAPHS

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Photo B.1 – Basement Area with Concrete Floor Looking West



Photo B.2 – Rock Wall in Basement



Photo B.3 – Painted Brick Wall and Debris, Southern Wing



Photo B.4 – Painted Elevator Cab



Photo E.1 – Loading Dock on West Side and PCB Soil Remediation Area



Photo E.2 – North Side of Building, Typical Windows and Fire Doors





Photo 1.2 – Painted Wood Flooring and Temporary Walls in First Floor Office Area



Photo 2.1 – Painted Ceiling and Temporary Walls for Self-Storage Units



Photo 2.2 – Painted Wall, Boarded Up Window, Temporary Construction Wall



Photo 2.3 – Painted Brick Wall, Replacement Windows, Debris



Photo 2.4 - Original Brick Framed Internal Doorway and Painted Walls



Photo 2.5 – Typical Self-Storage Locker Construction and Debris Within



Photo 3.1 – Typical Cream and Maroon Painting Third Floor Self-Storage Area



Photo 3.2 – Typical Flooring Condition



Photo 3.3 – Typical Storage Lockers, Windows (no caulk), and Debris



Photo 3.4 – Temporary Constructed Wall with Bricked Up Window



Photo 4.1 – Painted Walls, Ceilings, and Interior of Windows (no caulk)



Photo 4.2 – Typical Flooring



Photo 4.3 – Typical Debris



Photo A.1 – Typical Painted Plaster on Brick Wall and Window (no caulk)



Photo A.2 – Painted Elevator Doors



Photo A.3 – Painted Structural Roof Trusses



Photo A.4 – Typical Flooring



Photo A.5 – Typical Paint on Walls

APPENDIX D

OWNER'S CERTIFICATION

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TOWN OF VERNON



14 Park Place • Vernon, CT 06066 Tel: 860-870-3600 • Fax: (860) 870-3580 www.Vernon-ct.gov

March 29, 2021

Shaun Gately, Economic Development Coordinator Town of Vernon 14 Park Place Vernon, CT 06066

I, Shaun Gately, Economic Development Coordinator for the Town of Vernon, Connecticut, certify that I have read and understand the requirements for remediation of PCBs at the Daniel's Mill property at 98 East Main Street, Vernon, CT. To the best of my knowledge, all sampling plans, sample collection procedures, extraction procedures and chemical analysis procedures used to characterize PCB impacts at the Daniel's Mill property are on file at 14 Park Place, Vernon Town Hall (Town Clerk's Office) and are available for EPA inspection. Please note that during the ongoing COVID-19 pandemic, viewing is by appointment only, and can be made by contacting the Town of Vernon Town Clerk's Office at (860) 870-2662.

Shaun Gately/Economic Development Coordinator