

Electronic Transmittal Form for DEEP Remediation, LUST, and PCB Secure File Transfer (SFT)

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

www.ct.gov/deep

This Electronic Transmittal Form must be completed and included as the cover sheet of your electronic document when uploading a document to the Connecticut SFT website. Requirements for Transmittals through the SFT website:

- Documents submitted through the SFT website must include all applicable figures, tables and laboratory data.
 - Files must be formatted as PDF/A and use the appropriate naming convention:
 - For Remediation Filings: **REM_REMID #_SiteAddress_Town_DocumentType_DateofDocument**
 - For LUST Filings: LUST_SiteAddress_Town_AbbreviationForDocumentType_DateofDocument
 - For PCB Filings: PCB_SiteAddress_Town_AbbreviationForDocumentType_DateofDocument Example: LUST_1MainStreet_Hartford_ESA_01-01-2001
 Note: For "AbbreviationForDocumentType" use appropriate abbreviation at <u>Transmittal of Documents</u>
- If no Rem ID assigned (new filing) or REM ID is unknown leave field blank

Part I: Primary Recipient*: REM, PCB or LUST (* required)

For Remediation documents:	For PCB/LUST documents:	
Primary Program*: Brownfield Program	UST Facility ID: (if applicable)	
Rem ID*: 14919	Spill Case Number: (if known)	

Part II: Site Information

Site Name*: Former Daniel's Mill Site Address*: 98 East Main Street		
City/Town*: Vernon	State: CT	Zip Code: 06066
Secondary Programs (complete as many as appli	cable for this docume	nt):
Program: Select Secondary Program		Project ID:
Program: Select Secondary Program		Project ID:
Program: Select Secondary Program		Project ID:
Program: Select Secondary Program		Project ID:
Provide Project ID for each secondary program if it is kno Each program has a unique ID (i.e. Rem ID, Spill Case #		

Part III: Document Information (document type required for appropriate program[s] only)

Remediation*: Remedial Action Plan

LUST/PCB*: LUST/PCB Document Type

Date of Document*: 5/23/2023

Version: Final

Part IV: Submitter Information

Name*: David Rusczyk

E-mail*: david.rusczyk@gza.com

Name of company/business this document is being submitted on behalf of: *

Vernon Mill Owner, LLC



This form is a summary document to transmit a Remedial Action Plan (the <u>Electronic Document Transmittal Form</u> must be the cover page). When the use of this transmittal form is required or requested by the Commissioner, a Remedial Action Plan approved in writing by the LEP, a copy of public notification of remediation, as well as all other documentation that demonstrates all applicable laws and regulations have been complied with, is to be attached to this transmittal form.

Part I of this form must be completed and signed by the Party responsible to submit a Remedial Action Plan for the remediation of the parcel in accordance with the remediation standards. Part II of this form is to be completed and signed and sealed by a licensed environmental professional (LEP).

All sections of this form must be filled out, as applicable.

PART I: GENERAL INFORMATION

			Remediation I	D No. (Rem#):	14919	
Si	te Identification					
	Site/Establishment Name (as on Form III): Forme	r Daniel's Mill			
	Site/Establishment Addres	s: 98 East Main Street				
	City/Town: Vernon		Stat	e: CT Zip	o Code: 06066	
	Description in Property De	ed:				
	Recorded on page 278	of volume 2729	of the Town of Ve	ernon		
	land records, as lot 5	block 0117	on map 40	in the Tax	Assessor's Office.	

Check the box indicating under which program this documentation is being submitted:

Connecticut General Statutes (CGS) section 22a-134a(a)-(e), Property Transfer filing

CGS section 22a-133x, Voluntary Remediation

CGS section 22a-133y, Voluntary Remediation (leave Rem# blank)

Other (specify) Brownfield Remediation & Revitalization

Upload to the Connecticut Secure File Transfer (SFT) website (<u>https://sft.ct.gov</u>) the <u>Electronic Transmittal Form</u> (page 1), followed by the RAP Transmittal Form, the Remedial Action Plan, copies of the Public Notice, and all supporting documents.

Rem#: 14919

PART I: GENERAL INFORMATION (continued)

The following documentation must be attached to this form. Check boxes, as applicable, to verify that the documentation has been submitted with this form.

REMEDIAL ACTION PLAN -	in accordance with CGS Section 22a-134a(g)(1)
Dated: 5/22/23	Prepared by: GZA GeoEnvironmental, Inc.
 PUBLIC NOTICE OF REMED 22a-134a(i) copy of published notic copy of notice to local E 	
Check the applicable box if additional public notice requirements were implemented and provide documentation.	 sign erected on establishment copies of the notice of remediation mailed to abutting property owners
Note: Certifying Party must	t provide copies of any written public comments and responses.

List all applicable documentation and attach to this form.

DOCUMENT	DATED	PREPARED BY
Remedial Action Plan	5/22/23	GZA GeoEnviromental, Inc.

Certification

"I submit this form and attached remedial action plan approve I shall apply for all permits and approvals that are necessary t ensure that any necessary permit applications are complete and/or approval will be diligently pursued."	to carry out the remedial actions, and I shall
John Gumpert	Manasing member
Printed Name of Authorized Signatory	Title
ML	6-8-2023
Signature of Authorized Signatory	Date
Representing (Name of Company): Vernon Mill Owner, LLC	
Address: 4770 South Atlanta Road, Suite 200	
City/Town: Altanta	State: GA Zip Code: 30339
Phone: 404-456-4688	
Email: johngumpert@camdenmanagment.net	

Rem#: 14919

	o be completed by the LEP Groundwater Classification: GB					
Soi	Soil: Concentrations of Pollutants in Excess of RSR Criteria:					
Crite	erion Exceeded	Rem	edial Measure		COC	
	PMC		In-situ		Non-chlorinated VOCs	
	🗌 GA		Excavation / on-site re-use		Chlorinated VOCs	
	🗌 GB	\boxtimes	Excavation & removal	\boxtimes	Metals	
			Engineered Control	\boxtimes	PAHs	
\square	DEC		Date of Commissioner Approval:		SVOCs	
	🛛 Res	\boxtimes	ELUR	\boxtimes	PCBs	
	🖂 I / C		RSR exemption	\boxtimes	ETPH	
			RSR Alternative Criteria		Pesticides	
			Date of Commissioner Approval:		Other (specify):	
			Other (specify):			
Gro	oundwater: Conce	entrati	ions of Pollutants in Excess of	RSR	Criteria:	
Crite	erion Exceeded	Rem	edial Measure		COC	
			Pump & Treat		Non-chlorinated VOCs	
	GWPC		Air Sparging / Vapor extraction		Chlorinated VOCs	
	Volatilization		Dual-Phase		Metals	
	SWPC		Monitored natural attenuation		PAHs	
			ELUR		SVOCs	
			RSR exemption		PCBs	
			RSR Alternative Criteria		ETPH	
			Date of Commissioner Approval:		Pesticides	

PART II: REMEDIAL ACTION PLAN SUMMARY

Remedial Action Plan	Transmittal Form	(continued)	
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Rem#: 14919

PART II: REMEDIAL ACTION PLAN SUMMARY (continued)

Vapor Intrusion:							
	sub-slab depressurization						
Demodial Massura	vapor barrier						
Remedial Measure	indoor-air monitorii	idoor-air monitoring					
	Date of DPH Comr	missioner Approval of	such plan:				
NAPL present:	Overburden	Bedrock	None				
NAPL present: Other (specify):	Overburden	Bedrock	□ None				
	Overburden	Bedrock	□ None				
-	Overburden	Bedrock	□ None				

LEP Approval

LEP Approval		
"I have personally examined and am familiar with the informat this transmittal form, and I approve the attached remedial actio rendered in accordance with the 'Rules of Professional Conduc Connecticut State Agencies)."	n plan. My pro	ofessional services have been
Malcolm Beeler	586	
Printed Name of LEP	License Nu	mber
Juloln G. Bulu Signature of LEP	June 8, 202	23
Signature of LEP	Date	
Company: Weston & Sampson Address: 712 Brook Street, Suite 103 City/Town: Rocky Hill	State: CT	Zip Code: 06067
Phone: 860-513-1473		Affix Seal Here
Email: BeelerM@wseinc.com		No. 586 No. 586 No. 586 No. 586 No. 586 CENSED



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REMEDIAL ACTION PLAN FORMER DANIEL'S MILL 98 East Main Street Vernon, Connecticut

May 2023 File No. 05.0045441.12



PREPARED FOR: Town of Vernon Vernon, Connecticut

GZA GeoEnvironmental, Inc.

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

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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.gza.com May 23, 2023 GZA File No. 05.0045441.12

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

Re: Remedial Action Plan Former Daniels's Mill Vernon, Connecticut

Dear Mr. Gately:

On behalf of the Town of Vernon, GZA GeoEnvironmental, Inc. (GZA) has prepared this *Remedial Action Plan (RAP)* for the Daniel's Mill property located at 98 East Main Street in Vernon, Connecticut (Site). Environmental investigations performed to date have detected the presence of certain constituents within soil at both interior and exterior locations that will require remediation to comply with the Connecticut Department of Energy and Environmental Protection's Remediation Standards Regulations. The primary elements of this RAP include excavation of impacted soil in localized release areas, cleaning and removal/abandonment of an identified underground storage tank, and compliance groundwater monitoring.

The report is subject to the Terms and Conditions of our Agreement and the Limitations presented in **Appendix A**.

We trust this report satisfies your present requirements; should you require additional information, please call the undersigned at (860)-858-3110.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

David Rusczyk, P.E. Associate Principal

Adam T. Henry, PG, LEP Consultant/Reviewer





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1.0 INTRODUCTION

GZA GeoEnvironmental, Inc. (GZA), on behalf of the Town of Vernon, has prepared this *Remedial Action Plan* (RAP) for the former Daniel's Mill property located at 98 East Main Street in Vernon, Connecticut (the "Site"). A Locus Map depicting the location of the Site is included as **Figure 1**.

In 2015, the Town received a grant from the Connecticut Department of Economic and Community Development (DECD) to assess environmental conditions at the Site to facilitate future redevelopment and reuse of the property. GZA, on behalf of the Town, completed several rounds of investigations to assess environmental conditions at the Site and the potential presence of hazardous building materials. The results of these investigations are summarized in the following reports:

- Phase II Environmental Site Assessment, September 2015;
- Asbestos and Hazardous Building Materials Assessment, September 2015; and,
- Phase III Data Gap Investigation Report, December 2019.

Based on the results and observations made during the investigations outlined in these reports, remedial activities will be necessary within certain Areas of Concern (AOCs) to achieve compliance with the Connecticut Remediation Standard Regulations (RSRs). These AOCs include the following:

- AOC-3: Loading Dock Area;
- AOC-6: Historical Use of Site Building East of the Site Building; and,
- AOC-6: Historical Use of Basement.

A Site plan depicting the locations of these AOCs is attached as Figure 2.

In addition, polychlorinated biphenyls (PCBs) were detected within interior building materials at concentrations up to 254 mg/kg, in soils beneath the basement concrete floor in localized areas at concentrations greater than 50 mg/kg, and in soils in certain exterior areas adjacent to the building at concentrations up to 26 mg/kg. These PCB impacted materials are regulated under the *Toxic Substances Control Act* (TSCA; 40 CFR 761). Weston & Sampson Engineers, Inc. (W&S), on behalf of the Town of Vernon, submitted a RAP to address the PCB-impacted building materials to the Environmental Protection Agency (EPA) and Connecticut Department of Energy and Environmental Protection (CTDEEP) in December 2021 and, based on subsequent discussions with EPA and CTDEEP, a risk assessment will be performed to support submittal of a Modified RAP for the building materials consistent with a Risk-Based Cleanup under 40 CFR 761.61(c). In addition, in January 2023, GZA submitted a *Notification of Self-Implementing Cleanup* to EPA and CTDEEP to remove the PCB impacted concrete flooring in the basement, soils beneath the basement floor slab, and soils in certain exterior areas to meet the levels for unrestricted, high occupancy use (less than 1 mg/kg) under CFR 761.61(a)(4)(i)(A).

The Site is an integral part of a larger proposed mixed residential and commercial development that includes the former Amerbelle Textile Mill (which is owned by the Town of Vernon) located to the east of the Site and the former Anocoil Mill located to the south/southwest of the Site, which is owned by the selected redeveloper. To facilitate this development, the Town of Vernon applied for Brownfield Municipal Liability Relief Protection (BMLRP) in September 2020 and acquired the Site in 2021. The Town also received DECD and EPA grant funding to remediate the impacted soils and perform the hazardous building material abatement work at the Site, in anticipation of its redevelopment.



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This RAP serves to describe the required remedial activities to address the identified exterior and sub-slab soil impacts at the Site consistent with the RSRs. We also note that since characterization was not completed in strict accordance with Subpart N of the TSCA regulations (761.265), EPA approval of the *Notification of Self-Implementing Clean-Up* is required prior to implementation of these remedial activities. This RAP is organized as follows:

- Section 1.0 contains this introduction;
- Section 2.0 provides a background of the Site, the environmental setting, presents the Conceptual Site Model for the fate and transport of the identified releases, and describes the regulatory criteria applicable to the Site;
- Section 3.0 outlines the remedial activities necessary to achieve compliance with the RSRs;
- Section 4.0 outlines groundwater compliance monitoring programs;
- Section 5.0 outlines the anticipated schedule to implement the remedial activities; and,
- Section 6.0 describes the remedial reporting/documentation requirements.

This RAP is subject to the Limitations described in **Appendix A**.

2.0 BACKGROUND

This section describes the Site, the historical use of the Site based on our review of the available information, and the environmental setting of the Site. This section also provides a Conceptual Site Model for the fate and transport of the identified releases at the Site.

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. 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 (Anocoil) to the south/southwest. 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. Six underground storage tanks (USTs) were present within the narrow strip of land between the East Main Street sidewalk and the building. Three of these USTs were removed in October 2021 and the remaining three were abandoned in-place after cleaning the interior of the tanks due to the proximity of the tanks to the building and structural concerns. Areas to the west of the Site building are currently predominantly asphalt paved and 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.

The Site is serviced by municipal water and sanitary sewer, natural gas, and overhead electric; however, the utilities have been shut-off since the building is vacant.

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 woolen products between 1855 and 1951. After the cessation of textile operations, the Site was used to produce fire retardant paints, mastics and insecticides. Other past tenants at the Site include a salvage company, outboard motor center and furnace brokers



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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. However, the building is currently vacant.

2.2 ENVIRONMENTAL 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 south/southwest. 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.

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.

Hydrogeology

Groundwater in the Site area is classified by the 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).

2.3 CONCEPTUAL SITE MODEL

The primary release mechanism at the Site is inferred to be a surface release of virgin or waste fluids or petroleum/oils from former Site activities to the building's floor slab or exterior paved and unpaved surfaces. Given sufficient volume during a single release event or episodic releases over time, these release fluids would migrate to Site soils via cracks and/or joints within the paved and concrete surfaces. Exceptions to this migration pathway would be the release of materials directly to subsurface soils from the USTs or their associated piping located to the north and east of the Site building. Site soils are relatively impermeable and would serve to limit the vertical downward migration of releases to the groundwater table which is coincident or below the bedrock surface.



2.4 APPLYING THE REMEDIATION STANDARD REGULATIONS

The goal of the activities outlined herein are to achieve compliance with the remedial standards within Sections 22a-133k-1 through -3 of the Regulations of Connecticut State Agencies (RCSA), also known as the "Remediation Standard Regulations" (RSRs). The criteria applicable to constituents of concern released to Site soil include the Direct Exposure Criteria (DEC) and the Pollutant Mobility Criteria for a GB groundwater classified areas (GB-PMC), as defined under the Section 22a-133k-2 of the RSRs. The criteria applicable to the Site groundwater include the Surface Water Protection Criteria (SWPC) and Groundwater Volatilization Criteria (GWVC), as defined under Section 22a-133k-3 of the RSRs. A description of each of these criteria as well as their applicability to the Site is presented below.

2.4.1 Direct Exposure Criteria (DEC)

In soil, compliance with Direct Exposure Criteria (DEC) is evaluated through comparison of mass-based concentrations of contaminant constituents to established numerical criteria. The purpose of the DEC standard is to protect human health from risks associated with direct contact and/or ingestion of soil contaminants. Compliance with the DEC can be shown when the 95% upper confidence level of the mean of COC concentrations within a release area are less than the DEC. Otherwise, compliance is shown when all reported concentrations within the release area are less than the DEC.

The DEC are applicable to soil within 15 feet of ground surface. Separate criteria are established for residential (R-DEC) and industrial/commercial (I/C-DEC) areas. However, use of the less stringent industrial/commercial standards requires the owner of the property to place an Environmental Use Restriction (EUR) on the property land records prohibiting use of the property for residential purposes. As the intended use of the Site is residential, the results of sampling have been compared to the R-DEC for evaluation of compliance and the I/C-DEC for reference. The DEC standards do not apply to "inaccessible soils", which are defined as soils more than four feet bgs or two feet below qualifying pavement (>3-inches thick) or below an existing building, provided an EUR is in effect prohibiting the disturbance of the overlying soil, pavement and/or building.

2.4.2 Pollutant Mobility Criteria (PMC)

Concentrations of contaminant constituents in soil are also evaluated based on the Pollutant Mobility Criteria (PMC). The purpose of the PMC standard is to evaluate the potential for constituents to leach from the soil and degrade the underlying groundwater. Separate PMC standards are contained within the RSRs for sites located in Class GA and GAA groundwater areas versus those located in Class GB groundwater areas. Because the Site is located in a Class GB groundwater area, compliance with pollutant mobility criteria was evaluated using the GB-PMC.

The GB-PMC do not apply to soil located below the seasonal high groundwater table, or to soils that have been rendered "environmentally isolated" (i.e., below a building, other permanent structure or approved engineered control), as long as an appropriate EUR has been established.

2.4.3 Surface Water Protection Criteria (SWPC)

The SWPC are intended to provide an indication as to whether polluted groundwater discharging to a surface water could potentially cause degradation to the quality of the surface water body to a level where applicable Water Quality Standards are not being met. Compliance with the SWPC must be met at the point of discharge of the groundwater plume to the surface water body and may be determined by either a direct comparison of constituent concentrations to established numeric standards or by a number of alternative methods, including calculation of alternative SWPC criteria or Site-specific SWPC, with approval of the Commissioner.



2.4.4 Groundwater Volatilization Criteria (GWVC)

GWVC are intended to protect human health from risks associated with inhalation of volatile organic vapors which could potentially migrate up into occupied building areas from VOC constituents present within the underlying groundwater. Separate criteria are established for residential (R-GWVC) and industrial commercial (I/C-GWVC) areas. However, use of the less stringent industrial/commercial standards requires the owner of a property to establish an EUR on the property preventing the use of the property (or the applicable portion of the property) for residential purposes. As the intended use of the Site is residential, the results of sampling have been compared to the R-GWVC for evaluation of compliance. The GWVC are applicable to VOC concentrations in groundwater to depths of 15 feet below ground surface or the lowest level floor slab.

3.0 REMEDIAL ACTIVITIES

The following section outlines the remedial activities designed to address the releases to soil and groundwater identified in the *Phase III Data Gap Assessment Report* and achieve compliance with the RSRs. As indicated above, a separate *Notification of Self-Implementing Cleanup* was submitted to EPA and CTDEEP in January 2023 for the PCB impacted concrete in the basement, the PCB impacted soils beneath the basement floor slab, and the PCB impacted soils in certain exterior areas.

3.1 AOC-3 – LOADING DOCK

A loading dock is located on the western side of the building where virgin/waste materials and petroleum products were reportedly historically received/managed. Between 2015 and 2019, GZA advanced 13 soil borings in the vicinity of this AOC using either a GeoProbe[®] direct-push unit or portable, hand-held sampling equipment and analyzed 19 samples for various constituents including PCBs, volatile organic compounds (VOCs), polynuclear aromatic hydrocarbons (PAHs), extractable total petroleum hydrocarbons (ETPH), pesticides, and/or certain metals. Boring locations are shown on **Figure 2**.

As summarized in **Table 1**, PCB soil impacts in the loading dock area to the west of the building ranged in concentration from 0.13 mg/kg (B-35, 6-9") to 26 mg/kg (B-35, 10.5-13.5"). PCBs were detected above the Residential Direct Exposure Criteria (R-DEC) and Unrestricted, High-Occupancy Use Limit of 1 mg/kg in 7 of the 19 samples analyzed within this AOC. As depicted in **Figures 3** and **4**, the detected PCB impacts above 1 mg/kg appear to be bounded laterally to the north by boring B-24, to the west by borings B-21 and B-58, to the east by the loading dock, and to the south by a retaining wall between the paved loading dock area and the steep slope down to American Mill Pond. We note, based on historical drawings of the facility, it appears that the loading dock may have extended at one point to the southwest and the retaining wall may be remnants of the rear foundation wall for this former loading dock. The PCB impacts above 1 mg/kg extend to depths ranging from 24 inches bgs to 39 inches bgs. A potential source of the identified impacts within this AOC is releases to the ground surface of PCB containing materials that were formerly managed at the loading dock. 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 historical removal of the southwestern portion of the loading dock.

None of the other tested compounds exceeded the regulatory criteria within the RSRs.

Remedial Strategy

As shown on **Figure 4**, the remedial activities within AOC-3 are anticipated to include the following:



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- Removal and disposal of asphalt pavement over an approximate area of 580 square feet;
- Removal of soil over an approximate area of 580 square feet to a depth of 4 feet below the pavement surface (approximately 129 tons); and,
- Since characterization sampling has not been completed on a Subpart N grid, the soil and asphalt generated during the remedial work on the west of the building will be treated as soil/asphalt impacted with PCBs at concentrations <a>> 50 mg/kg and disposed of at a chemical waste landfill or Subtitle C landfill permitted to take PCB remediation waste at a concentration greater than 50 mg/kg in accordance with 40 CFR 761.61(b).

Upon achieving the anticipated excavation limits, verification samples will be collected analyzed on an accelerated turnaround. Verification sampling will be performed on a modified Subpart O basis. Samples will be collected on a 1.5-meter grid pattern from the upper 3-inches of soil. Up to 4 adjacent samples will be composited and analyzed for PCBs by Method 8082 using Method 3546 (Microwave Extraction). If the result of the composite sample is equal to or above 0.25 mg/kg (1/4 of the remedial target of 1 mg/kg), then the individual samples comprising the composite will be analyzed to determine where additional removal of soil is required. Additional remediation will be performed until all individual verification sample results meet the established remedial goal of less than 1 mg/kg or the results of composite samples are below the remedial goal divided by the number of samples (e.g., the target residual concentration for a composite sample consisting of 2 individual samples will be 0.5 mg/kg [1 mg/kg divided by 2 individual samples]).

Once verification sampling demonstrates compliance, the excavation will be backfilled in compacted lifts with clean imported fill from an off-Site source and re-paved.

3.2 AOC-6 HISTORICAL BUILDING USE EAST OF THE BUILDING

Doorways are present on the east side of the building that opened onto a non-paved alley between the Daniel's Mill property and the adjacent former Amerbelle Textile Mill property. Between 2015 and 2019, GZA advanced 11 soil borings within this alley to evaluate potential releases from former Site activities and to assess soil quality. Boring locations are shown on **Figure 2**. A total of 22 soil samples were analyzed for various constituents including VOCs, PCBs, PAHs, ETPH, and/or metals. **Table 2** summarizes the analytical results. Boring B-7 was also extended approximately 12 feet into bedrock (total depth of approximately 34 feet below ground surface) so that a monitoring well could be installed at this location (MW-2).

PCBs were detected within the fill materials in this area at concentrations ranging from 0.36 mg/kg (B-27, 3-5') to 17 mg/kg in sample B-7A (1.75-2'). PCBs were detected above the R-DEC and Unrestricted, High-Occupancy Use Limit of 1 mg/kg in 11 of the 19 samples analyzed within this area. As depicted in **Figures 3** and **5**, the extent of the PCB impacts above 1 mg/kg appear to be 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, which is currently vacant and also owned by the Town. PCB impacts above 1 mg/kg extend vertically to a depth of at least 5 feet bgs at boring B-7. 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 that provides access into the building in this area.

Lead and arsenic were also detected at concentrations above the R-DEC and arsenic was detected in two samples at concentrations above the Industrial/Commercial Direct Exposure Criteria (I/C-DEC). The three samples with the highest lead concentration and the two samples with the highest arsenic concentrations were also analyzed via the Synthetic Precipitation Leaching Procedure (SPLP) and the leachable lead/arsenic concentrations were below the GB Pollutant



Mobility Criteria (GB-PMC). PAHs were detected in several samples at concentrations above the R-DEC, I/C-DEC and GB-PMC (mass based). The two samples with the highest PAH concentrations were also analyzed via the SPLP and leachable PAHs were not detected above the analytical reporting limit, confirming compliance with GB-PMC using this alternative compliance method.

In addition, during the performance of the investigations, an UST was detected proximate to boring B-27. The top of the tank was encountered approximately 4 feet bgs; however, the size and orientation of the tank are unknown at this time. ETPH was detected in soils directly above the UST at a concentration of 398 mg/kg, which is below the R-DEC but indicative of a release.

Other than the petroleum hydrocarbons, it is unclear whether the source of these inorganic and PAH impacts are related to releases from former Site activities or the quality of the fill in this area. We note widespread coal ash fill is present on the former Amerbelle Mill property directly to the east of the Site and the presence of the PAHs and arsenic could be related to this fill material.

Remedial Strategy

As shown on **Figure 5**, the remedial work to the east of the building to address the comingled PCB, lead, arsenic, ETPH and PAH impacts is anticipated to include the excavation and disposal of soil over an area of approximately 824 square feet to depths of 5 to 7 feet bgs (approximately 280 tons). Since characterization sampling has not been completed on a Subpart N grid, the soil generated during the remedial work on the east of the building will be treated as soil impacted with PCBs at concentrations \geq 50 mg/kg and will be disposed of at a chemical waste landfill or Subtitle C landfill permitted to take PCB remediation waste at a concentration greater than 50 mg/kg in accordance with 40 CFR 761/61(b).

During the performance of the excavation, the identified UST will be exposed, the contents removed, and the interior of the tank cleaned, and the tank will be removed. Prior to removal, the contents of any interconnected piping will be drained and the piping subsequently removed.

Upon achieving the initial excavation limits, verification samples will be collected analyzed on an accelerated turnaround. Verification sampling will be performed on a modified Subpart O basis. Verification PCB samples will be collected on a 1.5-meter grid pattern from the upper 3-inches of soil. Up to 4 adjacent samples will be composited and analyzed for PCBs by Method 8082 using Method 3546 (Microwave extraction). If the result of the composite sample is equal to or above 0.25 mg/kg (1/4 of the remedial target of 1 mg/kg), then the individual samples comprising the composite will be analyzed to determine where additional removal of soil is required.

Verification sampling for the other contaminants will be collected and analyzed based on the following:

- At least one sample for every 20-feet of excavation sidewall and one sample every 400 square feet of excavation footprint will be analyzed for PAHs, arsenic, and lead; and,
- Samples will be collected from beneath the tank and the four sidewalls of the tank grave. The tank grave samples will be analyzed for ETPH, aromatic and chlorinated volatile organic compounds (VOCs) via EPA Method 8260, and semi-volatile organic compounds (SVOCs) via EPA Method 8270.

Additional remediation will be performed until all individual verification PCB sample results meet the established remedial goal of less than 1 mg/kg or the results of composite samples are below the remedial goal divided by the number of samples (e.g., the target residual concentration for a composite sample consisting of 2 individual samples will be 0.5



mg/kg [1 mg/kg divided by 2 individual samples]) or until the soil sampling results indicate PAH, arsenic, lead, and ETPH concentrations are below the R-DEC and GB-PMC.

Once verification sampling demonstrates compliance, the excavation will be backfilled in compacted lifts with clean imported fill from an off-Site source.

3.3 AOC-6 HISTORICAL BASEMENT USE

Based on historical drawings of the basement of the building, several open top, "Fixed Century" mixers, and "Hanging Lightning" mixers and a "J.H. Day" mixer 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 summarized in **Table 3**, PCBs were detected in the upper ½-inch of concrete within the basement floor at concentrations ranging from 0.8 mg/kg to 50.9 mg/kg (PCB-1-B11-32). PCBs were detected above 1 mg/kg in 8 of the 10 concrete samples analyzed. As summarized in **Table 4**, PCBs were also detected in sub-slab soils at concentrations ranging from 0.09 mg/kg (B-57, 5.5-8.5") to 91 mg/kg in sample B-11 (0.5-2'). Twelve of the 53 sub-slab soil samples analyzed contained PCB concentrations above 1 mg/kg. As depicted in **Figures 3** and **6**, the highest PCB concentrations in soil and concrete 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 the PCB impacts 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. The source of these sub-slab soil impacts appears to be related to the former manufacturing activities performed within the basement.

As summarized in **Table 5**, ETPH was also detected in one sample (B-14, 0.5-2') at a concentration above the R-DEC and lead was detected in another sample (B-19, 0.5-3') at a concentration above the R-DEC and I/C-DEC. Subsequent testing of sample B-19 by SPLP indicated that the leachable lead concentration was below the GB-PMC.

Remedial Strategy

As shown on Figure 6, the remedial work within the basement is anticipated to include the following:

- Removal of concrete over an area of approximately 2,900 square feet and disposal of approximately 109 tons of concrete;
- Removal of soil over an area of approximately 1,564 square feet to an average depth of 2 feet below the concrete floor (approximately 175 tons of soil);
- Scarification of the remaining approximately 2,350 square feet of concrete;
- Soil and concrete with PCB concentrations greater than 50 mg/kg (one area) will be segregated and disposed of at a chemical waste landfill or Subtitle C landfill permitted to take PCB remediation waste at a concentration greater than 50 mg/kg. Soil and concrete with PCB concentrations less than 50 mg/kg will be segregated and disposed of at a Subtitle D landfill; and,
- Recording of an Environmental Use Restriction (EUR) to render ETPH and lead impacted soils inaccessible.

Upon achieving the initial excavation limits, verification samples will be collected analyzed on an accelerated turnaround. Verification sampling will be performed on a modified Subpart O basis. Verification PCB samples will be collected on a 1.5-meter grid pattern from the upper 3-inches of soil. Up to 4 adjacent samples will be composited and



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analyzed for PCBs using Method 3546 (Microwave extraction) and Method 8082. If the result of the composite sample is equal to or above 0.25 mg/kg (1/4 of the remedial target of 1 mg/kg), then the individual samples comprising the composite will be analyzed to determine where additional removal of soil is required.

Once verification sampling demonstrates compliance, the excavation will be backfilled in compacted lifts with clean imported fill from an off-Site source and the floor slab restored with 6-inches of concrete.

4.0 PUBLIC NOTICE

GZA completed the following actions to provide public notice of the remedial actions proposed within this RAP in accordance with the requirements of Section 22a-134a(i) of the Connecticut General Statutes (CGS):

- A notice of the proposed remedial actions was published in the Journal Inquirer on April 15, 2023;
- A letter of notification of the planned remedial actions was sent to the Director of Health of the North Central District Health Department; and,
- A 4' by 6' sign was installed on the fence adjacent to the Site building that provided notice of the planned remedial actions to be completed at the Site.

The 30-day public notice and comment period ended May 15, 2023.

Comments from the public were limited to a request from the owner of a property proximate to the Site (113 Main Street) for a copy of the draft RAP. A hard copy of the draft RAP was mailed to the owner of the 113 Main Street property on April 26, 2023. No other comments or inquiries were received in response to the notices.

Copies of the letters, documentation of the publication of the notice in the newspaper and a photograph of the posted sign are presented in **Appendix B**.

5.0 GROUNDWATER MONITORING

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. Certain metals (arsenic, lead, and copper) were also detected in groundwater on the east side of the building during the July 2015 sampling event at concentrations above the Surface Water Protection Criteria (SWPC); however, these concentrations appear to have been biased high due to the entrainment of fines within the sample matrix while the samples were being collected with a bailer. 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. **Table 6** presents a summary of the Site groundwater analytical results.

5.1 SUPPLEMENTAL GROUNDWATER MONITORING

Three rounds of groundwater samples have been collected from the two Site monitoring wells and analyzed for various parameters. These samples were collected in the summer timeframe and pesticides, PAHs, arsenic, lead, and copper were



detected at concentrations potentially indicative of a release to groundwater. In order to further evaluate these groundwater impacts and potential seasonal fluctuations in concentrations, an additional round of groundwater samples will be collected from the two monitoring wells in the fall or spring timeframe and the samples analyzed for pesticides, PAHs, arsenic, lead, and copper. If the results from this additional round of sampling do not suggest a release or the presence of a groundwater plume, additional groundwater compliance monitoring will not be required.

5.2 COMPLIANCE GROUNDWATER MONITORING

In accordance with the requirements of the RSRs, a groundwater monitoring program must be developed to determine the effectiveness of remedial activities to address exceedances of the PMC. Monitoring may begin once active remedial actions have been completed and the applicable soil criteria has been achieved and may be discontinued after a minimum of four seasonal quarterly sampling events over a 2-year period demonstrate compliance with the applicable RSR criteria. Based on the available data, the soil remedial activities described above are primarily driven by exceedances of the DEC rather than the PMC. We also note that PCBs are generally considered immobile/stable in the environment and not leachable. In order to further evaluate the potential need for post remedial groundwater monitoring, the supplemental characterization/sampling programs described above will be augmented as follows:

- AOC-3: A representative soil sample with higher PCB concentrations from this AOC will be analyzed for leachable PCBs via SPLP. If PCB concentrations are below the GB-PMC, compliance groundwater monitoring will not be required for this AOC.
- AOC-6 (Exterior): SPLP testing for PAHs, lead and arsenic have already demonstrated compliance with the GB-PMC for these compounds within this AOC. A representative soil sample with higher PCB concentrations from this AOC will be analyzed for leachable PCBs via SPLP. If PCB concentrations are below the GB-PMC and GB-PMC exceedances are not detected upon removal/abandonment of the UST, compliance groundwater monitoring will not be required for this AOC.
- AOC-6 (Interior): SPLP testing for lead has already demonstrated compliance with the GB-PMC for this compound and ETPH concentrations were also below the GB-PMC. During the confirmatory soil sampling program, a representative sample with higher PCB concentrations from this AOC will be analyzed for leachable PCBs via SPLP. If PCB concentrations are below the GB-PMC, compliance groundwater monitoring will not be required for this AOC.

6.0 SCHEDULE

The schedule for completion of these proposed remedial activities is dependent on the proposed development and approvals of a separate PCB Remedial Action Plan by EPA.

7.0 REPORTING

A Remedial Action Report will be prepared following the completion of the remedial activities described within this RAP. The report will include a summary of field activities, analytical results, and figures showing the limits of soil excavation. The summary report will also include a schedule for the compliance groundwater monitoring program, to the extent required by the RSRs.

In addition, once the UST has been removed, the closure will be completed by registering the action with the CTDEEP. Records of the UST closure must be maintained by the owner for a minimum of 5 years.



TABLES

Table 1 Summary of Soil Analytical Data - AOC-3: Loading Dock Former Daniel's Mill 98 East Main Street Vernon, Connecticut

	Area	a of Concern							AOC-3				
Sample ID		RSR Criteria			B-1	B-2	B-21	B-22	B-22		B-22A		B-22B
Date			1	Unrestricted, High	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	Occupancy Use Criteria	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	Bs) (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	1	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) (mg/kg)		2							•	•	•
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)		2							•	•	•
ETPH	500	2,500	2,500	-	ND<54	ND<53	-	-	-	-	-	-	-
Total Metals (mg/kg)		• ·		2							•	•	•
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	100/3,9008	100/51,0008	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)	-	· · ·	<u>.</u>	•							•	•	
Arsenic	NE	NE	0.5	-	-	-	-	-	-	-	-	-	-
Barium	NE	NE	10	-	-	-	-	-	-	-	-	-	-
Lead	NE	NE	0.15	-	-	0.015	-	-	-	-	-	-	-
Notes:											1	1	

Notes:

R-DEC is the Residential Direct Exposure Criteria
 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.

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

Table 1 Summary of Soil Analytical Data - AOC-3: Loading Dock Former Daniel's Mill 98 East Main Street Vernon, Connecticut

	Area	a of Concern							AC	DC-3				
Sample ID		RSR Criteria			B-23		B-23A		B-23B	B-24	E	3-35	B-35A	B-58
Date				Unrestricted, High	8/7/2017		6/3/2019		6/24/2019	8/7/2017	6/3	/2019	6/24/2019	6/24/2019
Depth (feet)	R-DEC	I/C-DEC	GB-PMC	Occupancy Use Criteria	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 (VOCs) (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 (PC	(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	1	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 Hydroca	arbons (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 H			I	i			r	7	1	1		T	1	
ETPH	500	2,500	2,500	-	-	-	-	-	-	-	-	-	-	
Total Metals (mg/kg)	1		1	•			1	1	1			1	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		1		1	1	
Arsenic	NE	NE	0.5	-	-	-	-	-	-	-	-	-	-	-
Barium	NE	NE	10	-	-	-	-	-	-	-	-	-	-	
Lead Notes:	NE	NE	0.15	-	-	-	-	-	-	-	-	-	-	-

Notes:

R-DEC is the Residential Direct Exposure Criteria
 I/C-DEC is the Industrial/Commercial Direct Exposure Criteria

3. GB-PMC is the Industrial Connectian Direct Exposure Crit 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 parameter7. 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 2 Summary of Soil Analytical Data - AOC-6: Historical Building Use East of the Building Former Daniel's Mill 98 East Main Street Vernon, Connecticut

AIG	a of Concern								AO Out						
	RSR Criteria			B-7	[B-7A		B-25A		25B	B-26	R	-27	B.	27A
1			Unrestricted, High	7/22/2015		6/12/2019		8/9/2017		/2019	8/9/2017	8/7/2017	8/7/2017		/2019
R-DEC	I/C-DEC	GB-PMC	Occupancy Use Criteria	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
Cs) (mg/kg)					0 0.20	1	2.100	V I	0 0.25	0.701	50	· · 2		0 0.22	1.70 2
	1.000	40	-	0.32	-	-	-	-	-	-	-	-	-	-	-
5	44	1	-	0.0056	-	-	-	-	-	-	-	-	-	-	-
500*	1,000*	28*	-	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
500*	1,000*	28*	-	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
500	1,000	10.1	-	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
500*	1,000*	10*	-	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
12	110	1	-	ND<0.0049	-	-	-	-	-	-	-	-	-	-	-
	,		-		-	-	-	-	-	-	-	-	-	-	-
	1,000	19.5	-	0.0077	-	-	-	-	-	-	-	-	-	-	-
(mg/kg)		1								-					1
1			-												< 0.38
1			-												< 0.38
1		NE	1	11	2.8	17	< 0.39	8.4	1.7	0.93	0.6	4.8	0.36	8.5	< 0.38
	10 11/	5.74			1			2.22		1	NID -0.272	NID -0.901	ND -0.020		
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,	,	-			-										-
1,000	,				-										-
1		-													-
1	1	1						-							_
8.4*		1.0*			-										-
		1	-		-	-	-		-	-				-	-
84*	780*	1*	-		-	-	-	37.6	-	-	1.06			-	-
1*	1*	1*	-	0.38	-	-	-	10.3	-	-	0.233	ND<0.402	1.11	-	-
1,000	2,500	56	-	2.7	-	-	-	92.4	-	-	3.04	3.06	13	-	-
1,000	2,500	56	-	0.28	-	-	-	7.07	-	-	ND<0.372	ND<0.801	ND<0.838	-	-
1*	7.8*	1.0*	-	1.6	-	-	-	15.9	-	-	0.42	ND<0.801	1.79	-	-
1,000	2,500	5.6	-	0.64	-	-	-	5.26	-	-	ND<0.372	ND<0.801	ND<0.838	-	-
1,000	2,500	40	-		-	-	-	67.2	-	-	1.9	1.36		-	-
,	,	40	-	2.3	-	-	-	78.1	-	-	2.26	1.93	7.83	-	-
		1			l							1			
		varies	-	-	-	-	-	ND	-	-	-	-	ND	-	-
		1			1							1	1		
500	2,500	2,500	-	280	-	-	-	-	-	-	-	-	398	-	-
10						1		0.7		1		100.054	15.0		1
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1															-
	,			0.11	-	-		-	-	-	-	-	-	-	-
			-	ND<1.4	-	-	-	-	-	-	-	-	- 1	-	-
340	/		-		-	-	-	-	-	-	-	-	-	-	-
	.,		•		•					I		1			
NE	NE	0.5	-	ND<0.004	-	-	-	-	-	-	-	-	< 0.025	-	-
NE	NE	10	-	-	-	-	-	-	-	-	-	-	-	-	-
NE	NE	0.15	-	ND<0.01	-	-	-	0.025	-	-	-	-	< 0.010	-	-
	500* 500 500 500 500 500 500 500 500 500 500 500 500 500 12 500 10 1 </td <td>500 1,000 5 44 500* 1,000* 500 1,000* 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 10 1 10 1 1 10 ns (PAHS) (mg/kg) 270* 270* 1,000* 1,000 2,500 1 7.8 1 1 1 7.8 8.4 78 8.4 78 8.4 78 8.4 78 1.000 2,500 1,000 2,500 1,000 2,500 1,000 2,500 1,000 2,500 1,000</td> <td>500 1,000 40 5 44 1 500^* 1,000* 28^* 500^* 1,000* 28^* 500^* 1,000* 28^* 500^* 1,000* 10^* 10^* 1000^* 10^* 12 110 1 500 $1,000$ 67 500 $1,000$ 67 500 $1,000$ 67 500 $1,000$ 19.5 (mg/kg) $mg/kg)$ $mg/kg)$ 270^* $1,000^*$ 5.6^* $1,000^*$ 2.500^* 84^* $1,000^*$ 2.500^* 84^* $1,000$ 2.500 56 $1,000$ <</td> <td>500 1,000 40 - 5 44 1 - 500^* 1,000* 28^* - 500^* 1,000* 28^* - 500^* 1,000 10.1 - 500^* 1,000 10^* - 12 110 1 - 500^* $1,000^*$ 67^* - 500^* $1,000^*$ 67^* - 500^* $1,000^*$ 5.6^* - 1 10^* NE - 1 10^* NE - 1 10^* NE - $1,000^*$ $2,500^*$ 84^* - $1,000^*$ $2,500^*$ 84^* - $1,000^*$ $2,500^*$ 84^* - $1,000^*$ $2,500^*$ 56^* - $1,000^*$ $2,500^*$ 56^* - $1,000^*$ $2,500^*$</td> <td>S3) (mg/kg) 0.32 5 44 1 - 0.0056 500° 1.000* 28* - ND<0.0049</td> 500° 1.000* 28* - ND<0.0049	500 1,000 5 44 500* 1,000* 500 1,000* 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 500 1,000 10 1 10 1 1 10 ns (PAHS) (mg/kg) 270* 270* 1,000* 1,000 2,500 1 7.8 1 1 1 7.8 8.4 78 8.4 78 8.4 78 8.4 78 1.000 2,500 1,000 2,500 1,000 2,500 1,000 2,500 1,000 2,500 1,000	500 1,000 40 5 44 1 500^* 1,000* 28^* 500^* 1,000* 28^* 500^* 1,000* 28^* 500^* 1,000* 10^* 10^* 1000^* 10^* 12 110 1 500 $1,000$ 67 500 $1,000$ 67 500 $1,000$ 67 500 $1,000$ 19.5 (mg/kg) $mg/kg)$ $mg/kg)$ 270^* $1,000^*$ 5.6^* $1,000^*$ 2.500^* 84^* $1,000^*$ 2.500^* 84^* $1,000$ 2.500 56 $1,000$ 2.500 56 $1,000$ 2.500 56 $1,000$ 2.500 56 $1,000$ 2.500 56 $1,000$ 2.500 56 $1,000$ <	500 1,000 40 - 5 44 1 - 500^* 1,000* 28^* - 500^* 1,000* 28^* - 500^* 1,000 10.1 - 500^* 1,000 10^* - 12 110 1 - 500^* $1,000^*$ 67^* - 500^* $1,000^*$ 67^* - 500^* $1,000^*$ 5.6^* - 1 10^* NE - 1 10^* NE - 1 10^* NE - $1,000^*$ $2,500^*$ 84^* - $1,000^*$ $2,500^*$ 84^* - $1,000^*$ $2,500^*$ 84^* - $1,000^*$ $2,500^*$ 56^* - $1,000^*$ $2,500^*$ 56^* - $1,000^*$ $2,500^*$	S3) (mg/kg) 0.32 5 44 1 - 0.0056 500° 1.000* 28* - ND<0.0049	Sol 1,000 40 - 0.32 - 5 44 1 - 0.0056 - 500* 1,000* 28* - ND<0.0049	So (mg/kg) 0.00 40 - 0.32 - - 5 44 1 - 0.0056 - - 500* 1.000* 28* - ND<0.0049	Sh (mg/kg) Image is a strain of the image is strain of	Sol mage Image Image	Sym my by Image of the symmetry of th	$\begin{array}{c c c c c c c c c c c c c c c c c c c $	Spin state Spin st	3) Imply - 0.32 - <th< td=""><td>Shorm 4.20 Solur Solur</td><td>Shorm Area Original A</td></th<>	Shorm 4.20 Solur Solur	Shorm Area Original A

Bold and shaded indicates sample was detected above RSR Criteria.
 Criteria for total chromium are not established. As a conservative

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

Table 2 Summary of Soil Analytical Data - AOC-6: Historical Building Use East of the Building Former Daniel's Mill 98 East Main Street Vernon, Connecticut

	Ar	ea of Concern								DC-6 tside			
Sample ID		RSR Criteria			B	3-36	1		B-36A	tside		B-37	1
Date				Unrestricted, High		2/2019			6/12/2019			6/12/2019	
Depth (feet)	R-DEC	I/C-DEC	GB-PMC	Occupancy Use Criteria	0-2	4-6	0-0.25	1.75-2	2.75-3'	4-4.25'	6-6.25	0-1.75	0-0
Volatile Organic Compounds	(VOCs) (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	-	-	-	-	-	-	-	-	-	-
Polychlorinated Biphenyls (P	CBs) (mg/kg)												
Aroclor 1254	1	10	NE	-	-	-	8.8	12	8.4	1.4	0.84	-	<0.
Aroclor 1260	1	10	NE	-	-	-	<1.9	<1.9	< 0.81	< 0.79	< 0.38	-	<0.
Total PCBs	1	10	NE	1	-	-	8.8	12	8.4	1.4	0.84	-	<0.
Polynuclear Aromatic Hydro	carbons (PAHs)	(mg/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	Hydrocarbons (P	AHs) (mg/kg)											
Various	varies	varies	varies	-	-	-	-	-	-	-	-	-	-
Extractable Total Petroleum													
ETPH	500	2,500	2,500	-	320	<49	-	-	-	-	-	<53	-
Total Metals (mg/kg)								•					
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)				1			T		T	1	1		
Arsenic	NE	NE	0.5	-	-	-	-	-	-	-	-	-	-
Barium	NE	NE	10	-	-	-	-	-	-	-	-	-	-
Lead	NE	NE	0.15	-	-	-	-	-	-	-	-	-	-
Notes:													

Notes:

R-DEC is the Residential Direct Exposure Criteria
 I/C-DEC is the Industrial/Commercial Direct Exposure Criteria

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

S. OB-FINC Is the Class OB Follutant Mobility Chiefla 4. "*" = From the 2018 Additional Polluting Substances list (required DEEP approval)
 "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

Chieffa for foral 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.

B-3	37A
6/12/	2019
0-0.25	1.5-1.75
-	-
-	-
-	-
-	-
-	-
-	-
-	-
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-	-
-	-
-0.27	0.70
<0.37 <0.37	0.79
<0.37	<0.36
<0.37	0.79
-	-
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Table 3 Concrete Analytical Data Summary AOC-6: Basement of Building 98 East Main Street Vernon, Connecticut

	DATE					PCB CONC	CENTRATIC	DN (mg/kg)		Unrestricted, High
SAMPLE NUMBER	SAMPLED		MATERIAL DESCRIPTION	MATERIAL LOCATION	Aroclor	Aroclor	Aroclor	Aroclor	Total	Occupancy Use
	5				1242	1254	1260	1268	PCBs	Criteria
BASEMENT										Critteria
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	1
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	1
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	1
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	1
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	1
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	1
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	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	1
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	1
PCB-1-B15-33	8/7/2017	Concrete Floor	Top 0.5" - upper layer of concrete flooring	Building 1, basement, at boring B-15A, floor	ND<4.2	38.3	ND<4.2	ND<4.2	38.3	1

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

Bold = Sample results exceed 1 mg/kg.

Table 4 PCB Soil Analytical Data Summary - AOC-6: Basement of Building Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Area	of Concern						AOC	6: Basement of	Building				
Sample ID	R-DEC	Unrestricted, High	B-10	B-11	B-11A	B-13	B-13A	B-14	B-15A	B-19	B-28	B-29	B-31
Date		Occupancy Use	7/21/2015	7/21/2015	8/8/2017	7/21/2015	8/8/2017	7/21/2015	8/8/2017	7/21/2015	8/8/2017	8/8/2017	8/8/2017
Depth			0.5-2 ft	0.5-2 ft	2-2.25 ft	0.25-1 ft	0-0.25 ft	0.5-2 ft	0-0.25 ft	0.5-3 ft	0-0.25 ft	0-0.25 ft	0-0.25 ft
Polychlorinated Biphenyls (PC)	Bs) (mg/kg)					•							
Aroclor 1254	1	1	ND<0.36	91	0.5	6.3	ND<0.06	21	ND<0.06	0.8	0.2	0.2	0.2
Aroclor 1260	1	1	ND<0.36	< 14	0.07	< 1.8	ND<0.06	< 1.9	ND<0.06	< 0.36	ND<0.06	ND<0.06	ND<0.06
Total PCBs	1	1	ND<0.36	91	0.57	6.3	ND<0.06	21	ND<0.06	0.8	0.2	0.2	0.2
Area	of Concern						AOC	6: Basement of	Building				
Sample ID	R-DEC	Unrestricted, High	B-32	B-33	B-38	B-39	B-40	B-41	B-42	B·	-43	B·	44
Date		Occupancy Use	8/8/2017	8/8/2017	6/3/2019	6/3/2019	6/3/2019	6/3/2019	6/3/2019	6/3/	2019	6/3/2	2019
Depth			0-0.25 ft	0-0.25 ft	7-10 in.	6-9 in.	4-7 in.	1-4 in.	7-10 in.	3-6 in.	15-18 in.	0-3 in.	12.5-15.5 in.
Polychlorinated Biphenyls (PC)	Bs) (mg/kg)												
Aroclor 1254	1	1	ND<0.06	0.1	< 0.074	< 0.072	< 0.073	0.29	< 0.07	1.8	< 0.35	1.8	< 0.38
Aroclor 1260	1	1	ND<0.06	ND<0.06	< 0.074	< 0.072	< 0.073	< 0.078	< 0.07	< 0.37	< 0.35	< 0.37	< 0.38
Total PCBs	1	1	ND<0.06	0.1	< 0.074	< 0.072	< 0.073	0.29	< 0.07	1.8	< 0.35	1.8	< 0.38
													4
Area	of Concern						AOC-6: Base	ment of Building	Ş				
Sample ID	R-DEC	Unrestricted, High	B-45		-46	B-47	B-48		49	B-50	В-	-	
Date		Occupancy Use	6/3/2019	6/3/2	2019	6/3/2019	6/3/2019	6/3/2	2019	6/3/2019	6/3/2	019	
Depth			5.5-8.5 in.	4-7 in.	16-19"	8-11 in.	4-7 in.	4-7 in.	16-19 in.	4-7 in.	1-4 in.	13-16 in.	
Polychlorinated Biphenyls (PC)	Bs) (mg/kg)	1											
Aroclor 1254	1	1	< 0.074	2.1	< 0.34	2	< 0.07	1.4	< 0.38	< 0.077	11	< 0.45	
Aroclor 1260	1	1	< 0.074	< 0.37	< 0.34	< 0.38	< 0.07	< 0.39	<0.38	< 0.077	<5.9	< 0.45	
Total PCBs	1	1	< 0.074	2.1	< 0.34	2	< 0.07	1.4	< 0.38	< 0.077	11	< 0.45]

Area	of Concern					AOC-6: Base	ment of Buildin	g				
Sample ID	R-DEC	Unrestricted, High	B-52		B-53	B	-54	B-55	B-56	B-57		
Date		Occupancy Use	6/3/2019		6/3/2019	6/3/	6/3/2019		6/3/2019	6/24/2019		
Depth			6-9 in.	13-16 in.	7-10 in.	18-21 in.	30-33 in.	8-11 in.	8-10 in.	5.5-8.5 in.		
Polychlorinated Biphenyls (PCB	Polychlorinated Biphenyls (PCBs) (mg/kg)											
Aroclor 1254	1	1	3.7	< 0.36	< 0.078	1.3	0.52	< 0.057	2.1	0.09		
Aroclor 1260	1	1	< 0.54	< 0.36	< 0.078	< 0.33	< 0.52	< 0.057	< 0.41	< 0.07		
Total PCBs	1	1	3.7	< 0.36	< 0.078	1.3	0.52	< 0.057	2.1	0.09		

Area	of Concern						AOC	-6: Basement of	Building				
Sample ID	R-DEC	Unrestricted, High	B-59	B-60	B-61	B-62	B-63	B-64	B-66	B-67	B-68	B-69	B-70
Date		Occupancy Use	10/11/22	10/11/22	10/11/22	10/11/22	10/11/22	10/11/22	10/13/22	10/13/22	10/13/22	10/13/22	10/13/22
Depth			0-0.25 ft	0-0.5 ft	0-0.25 ft	0-0.25 ft	0-0.25 ft	0-0.25 ft					
Polychlorinated Biphenyls (PCBs) (mg/kg)													
Aroclor 1254	1	1	ND<0.20	ND<0.18	ND<0.19	ND<0.19	ND<0.18	ND<0.18	ND<0.17	ND<0.18	ND<0.19	ND<0.20	ND<0.19
Aroclor 1260	1	1	ND<0.20	ND<0.18	ND<0.19	ND<0.19	ND<0.18	ND<0.18	ND<0.17	ND<0.18	ND<0.19	ND<0.20	ND<0.19
Total PCBs	1	1	ND<0.20	ND<0.18	ND<0.19	ND<0.19	ND<0.18	ND<0.18	ND<0.17	ND<0.18	ND<0.19	ND<0.20	ND<0.19

Area	of Concern			asement of ding
Sample ID	R-DEC	Unrestricted, High	B-71	B-72
Date		Occupancy Use	10/13/22	10/13/22
Depth			0-0.25 ft	0-0.25 ft
Polychlorinated Biphenyls (PC	Bs) (mg/kg)			
Aroclor 1254	1	1	0.37	ND<0.19
Aroclor 1260	1	1	ND<0.19	ND<0.19
Total PCBs	1	1	0.37	ND<0.19

Notes:

1. R-DEC is the Residential Direct Exposure Criteria within CT Department of Energy and Environmental Protection's Remediation Standard Regulations.

2. Bold and shaded indicates sample was detected above the R-DEC and the non-conditional Unrestricted, High Occupancy Use Limit.

3. All depths are measured from ground surface.

Table 5 Summary of Soil Analytical Data - AOC-6: Historical Basement Use Former Daniel's Mill 98 East Main Street Vernon, Connecticut

	Area of Concern									Inside						
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
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	7/21/201
Depth (feet)	K-DEC	I/C-DEC	GD-1 MC	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
olatile Organic Compounds	(VOCs) (mg/kg)															
,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<0.0
arbon 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<0.0
,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<0.0
,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<0.0
thylbenzene	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<0.0
-Propylbenzene	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<0.0
Tetrachloroethene	12	110	1	0.015	ND<0.01	-	ND<0.006	ND<0.0057	-	ND<0.0059	ND<0.0047	-	ND<0.28	-	ND<0.0051	ND<0.0
oluene	500	1,000	67	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<0.0
Cylene	500	1,000	19.5	0.0078	0.123	-	ND<0.006	ND<0.0057	-	ND<0.0059	ND<0.0047	-	ND<0.28	-	ND<0.0051	ND<0.0
PLP VOCs (mg/L)	1 ·	1 .				r	T	1					г			
Various	varies	varies	varies	-	-	-	-	-	-	-	-	-	-	ND	-	-
esticides (mg/kg)	1 ·	1 .				r	T						г	1		
esticides	varies	varies	varies	ND	-	-	-	ND	-	-	-	-	-	-	-	ND
olynuclear Aromatic Hydro		00														
-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.
cenaphthene	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.
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.
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.
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.
Benzo(b)fluoranthene	1	7.8 78*	1.0*	ND<0.26 0.43	ND<0.38 0.42	-	ND<0.24 ND<0.24	ND<0.25 ND<0.25	-	ND<0.27 ND<0.27	ND<0.25 ND<0.25	-	ND<0.24 ND<0.24	-	ND<0.25 ND<0.25	ND<0.
Benzo(g,h,i)perylene	8.4*		1.0*			-			-			-		-	ND<0.25	ND<0.
Benzo(k)fluoranthene		78 780*	1*	ND<0.26 ND<0.26	ND<0.38 ND<0.38	-	ND<0.24 ND<0.24	ND<0.25 ND<0.25	-	ND<0.27 ND<0.27	ND<0.25 ND<0.25	-	ND<0.24 ND<0.24	-	ND<0.25	ND<0.
Chrysene Dibenz(a.h)anthracene	84*	/80*	1*	ND<0.26 ND<0.26	ND<0.38 ND<0.38	-	ND<0.24	ND<0.25	-		ND<0.25 ND<0.25	-	ND<0.24 ND<0.24		ND<0.25	ND<0.
Fluoranthene	1,000	2,500	56	ND<0.26	ND<0.38		ND<0.24	ND<0.25		ND<0.27 ND<0.27	ND<0.25		ND<0.24	-	ND<0.25	ND<0.
Fluorene	1,000	2,500	56	ND<0.26	ND<0.38	-	ND<0.24	ND<0.23	-	ND<0.27	ND<0.25	-	ND<0.24	-	ND<0.25	ND<0.
ndeno(1,2,3-cd)Pyrene	1,000	2,300	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<0.1
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.
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.
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.
SPLP Polynuclear Aromatic	,	<i>,</i>		112 (0120	112 (0150		112 (012)	110 (0120		112 (012)	112 (0120		112 (0121		110 (0120	112 (0).
Various	varies	varies	varies	-	-		-	-	-	· .	-	-	-	-	ND< 53	-
Extractable Total Petroleum			varios												112 (00	
ETPH	500	2,500	2,500	360	-	-	ND< 52	ND< 53	-	1,100	ND< 53	-	ND< 53	-	ND< 53	72
Fotal Metals (mg/kg)		_,	_,							_,_ *						· · -
Arsenic	10	10	NE	2.1	-	-	-	2.1	-	-	-	-	-	-	-	1.4
Barium	4,700	140,000	NE	83.8	-	-	-	62.9	-	-	-	-	-	-	-	1440
Cadmium	34	1.000	NE	ND< 0.34	-	-	-	ND< 0.37	-	-	-	-	-	-	-	1.85
Chromium	100/3,9008	100/51,000 ⁸	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
Aercury	20	610	NE	0.06	-	-	-	0.15	-	-	-	-	-	-	-	0.11
Selenium	340	10,000	NE	ND<1.4	-	-	-	ND< 1.5	-	-	-	-	-	-	-	ND< 1
ilver	340	10,000	NE	ND< 0.34	-	-	-	ND< 0.37	-	-	-	-	-	-	-	ND< 0.
PLP Metals (mg/L)																
Arsenic	NE	NE	0.5	-	-	-	-	-	-	-	-	-	-	-	-	-
arium	NE	NE	10	-	-	-	-	-	-	-	-	-	-	-	-	0.021
ead	NE	NE	0.15	0.01	-	-	-	-	-	-	-	-	-	-	-	0.029
Alcohols (mg/kg)																
Alcohols	varies	varies	varies	-	-	-	-	-	-	ND	ND	-	ND	-	ND	-
lotes: 1. R-DEC is the Residential 2. I/C-DEC is the Industrial/ 3. GB-PMC is the Class GB 4. "*" = From the 2018 Add	Commercial Direc	t Exposure Crito y Criteria	eria													

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

Table 6Summary 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 Compour	nds (VOCs) (u	g/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 Hyd	lrocarbons (PA	AHs) (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.

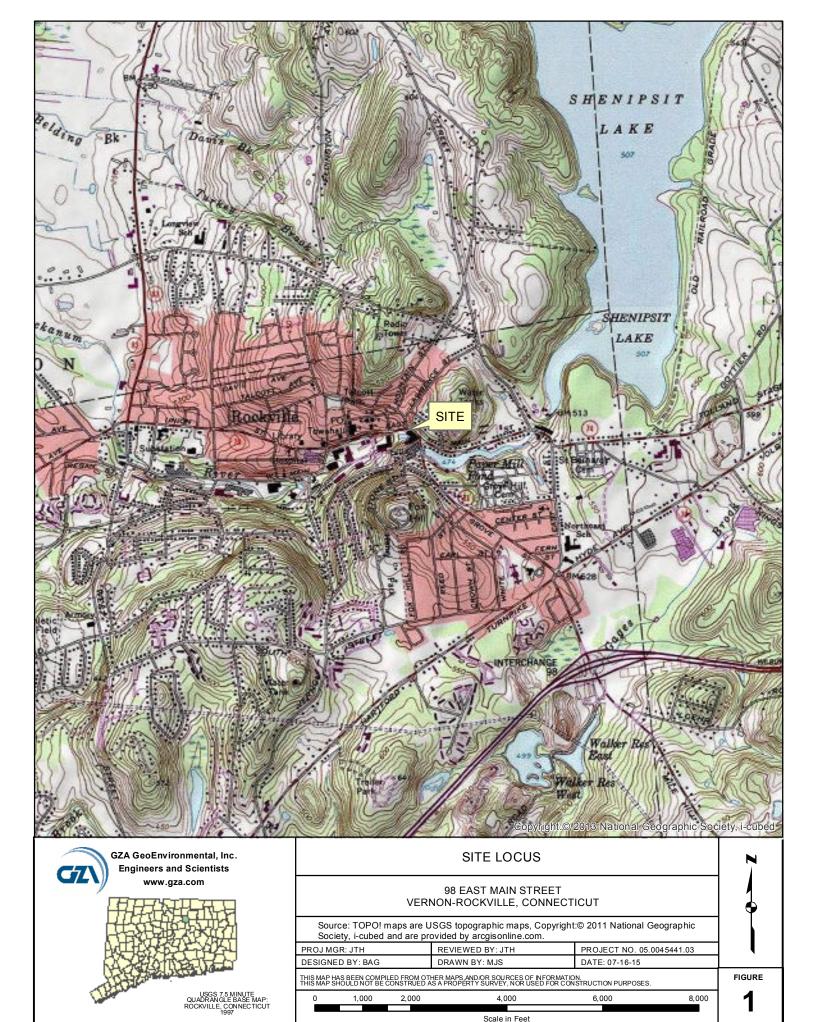
9. < 1 = Analyte not detected above detection limits

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

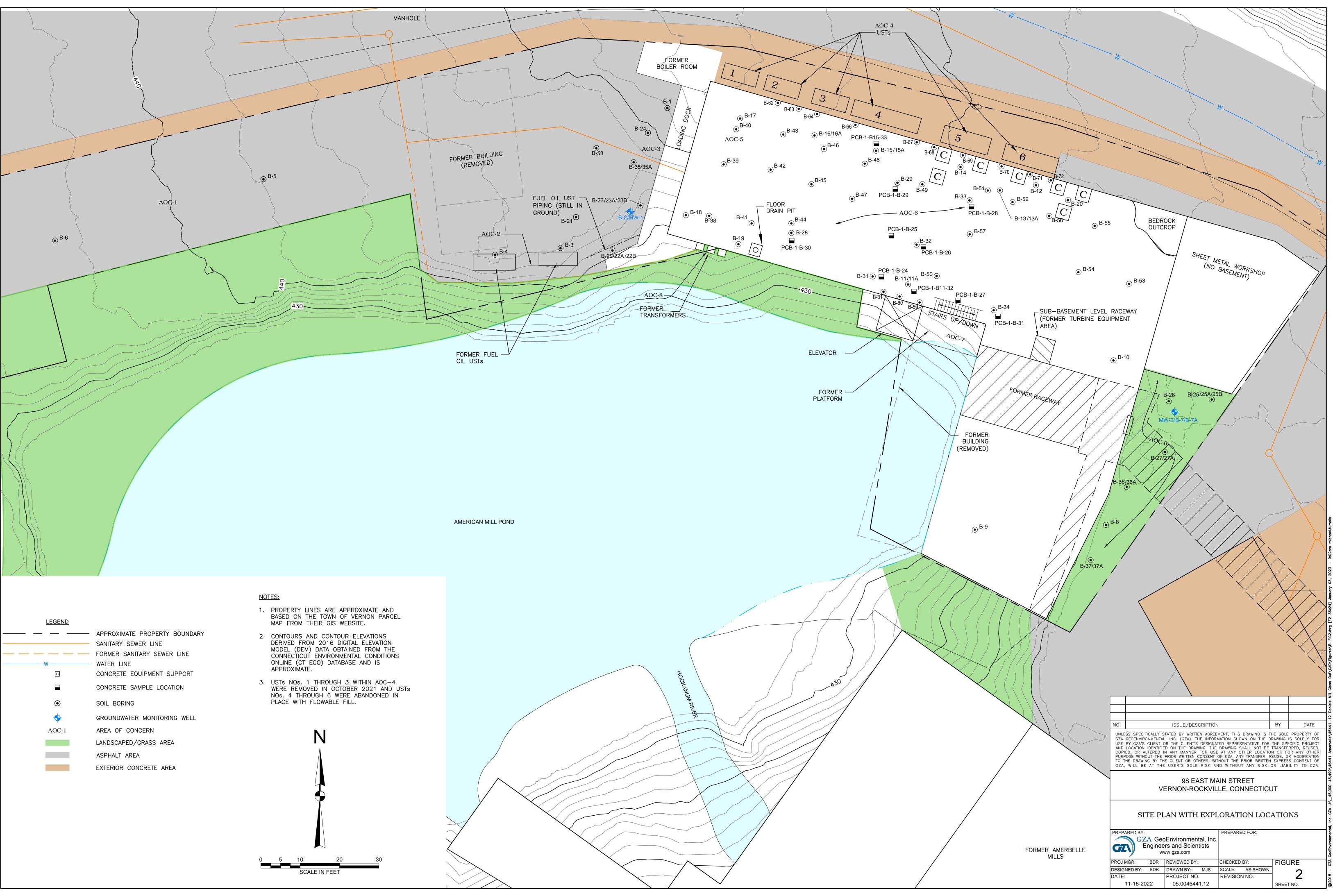
11. "NA" = Not Analyzed

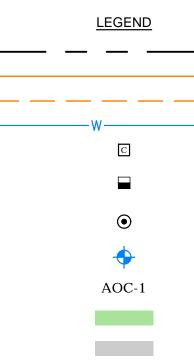


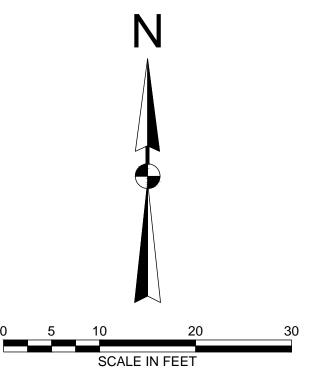
FIGURES

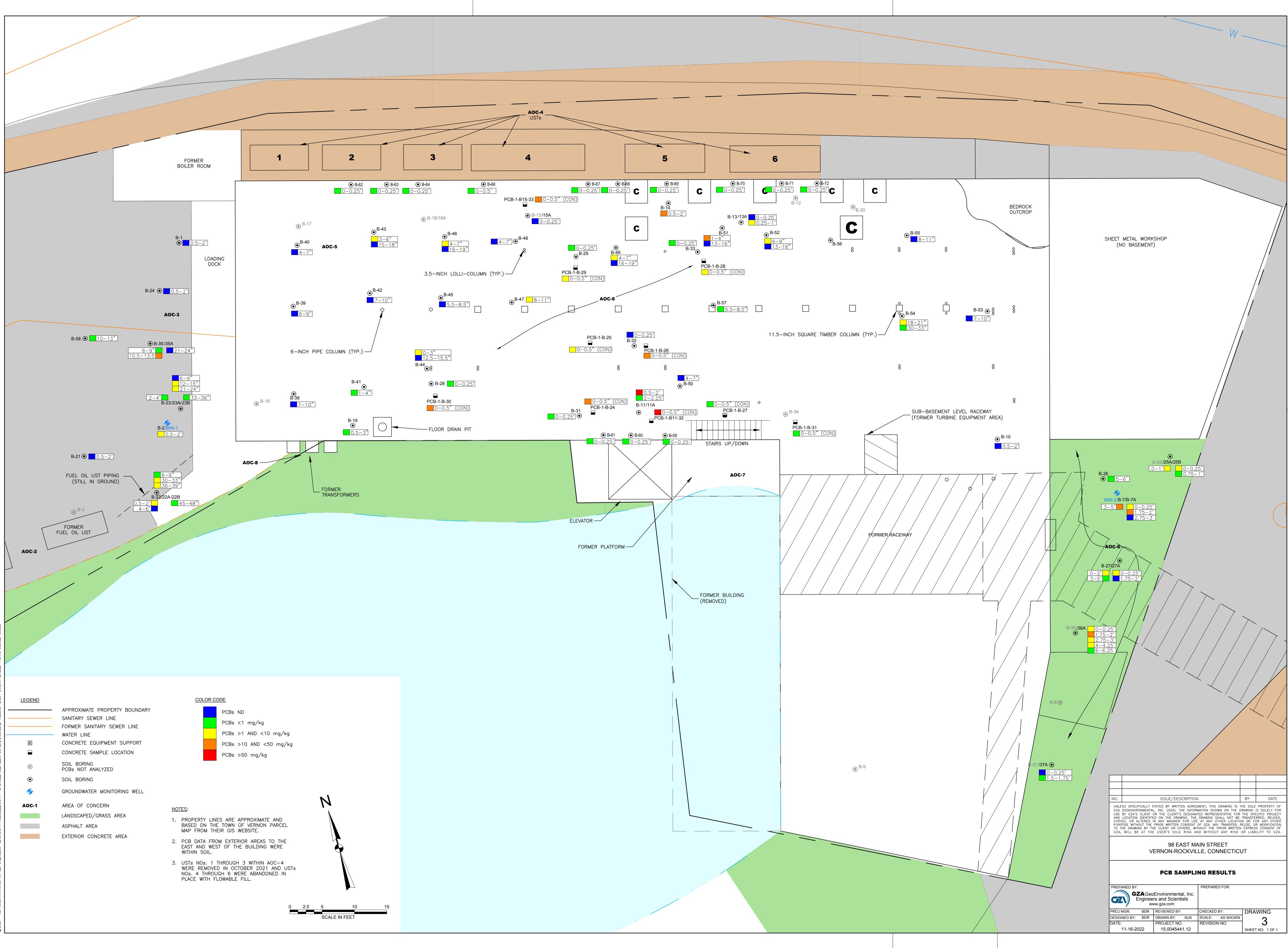


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A GeoEnvironmental, Inc. GZA-J:_45,000-45,499\45441 AMERBELLE\45441-12 DANIELS MILL CLEAN OUT\CAD\FIGURES\B-FIG3.DWG 42X30 JANUARY 5, 2023 11:01AM

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----- APPROXIMATE PROPERTY BOUNDARY ----- FORMER SANITARY SEWER LINE SOIL BORING SOIL BORING PCBs NOT ANALYZED

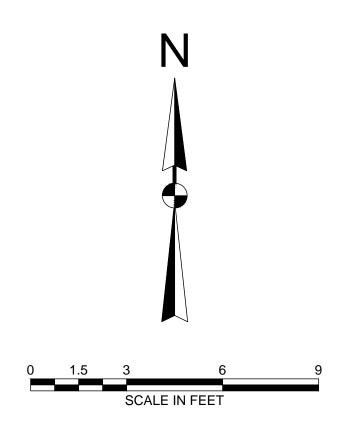
GROUNDWATER MONITORING WELL AREA OF CONCERN LANDSCAPED/GRASS AREA ASPHALT AREA CONCRETE AREA PROPOSED SOIL EXCAVATION AREA

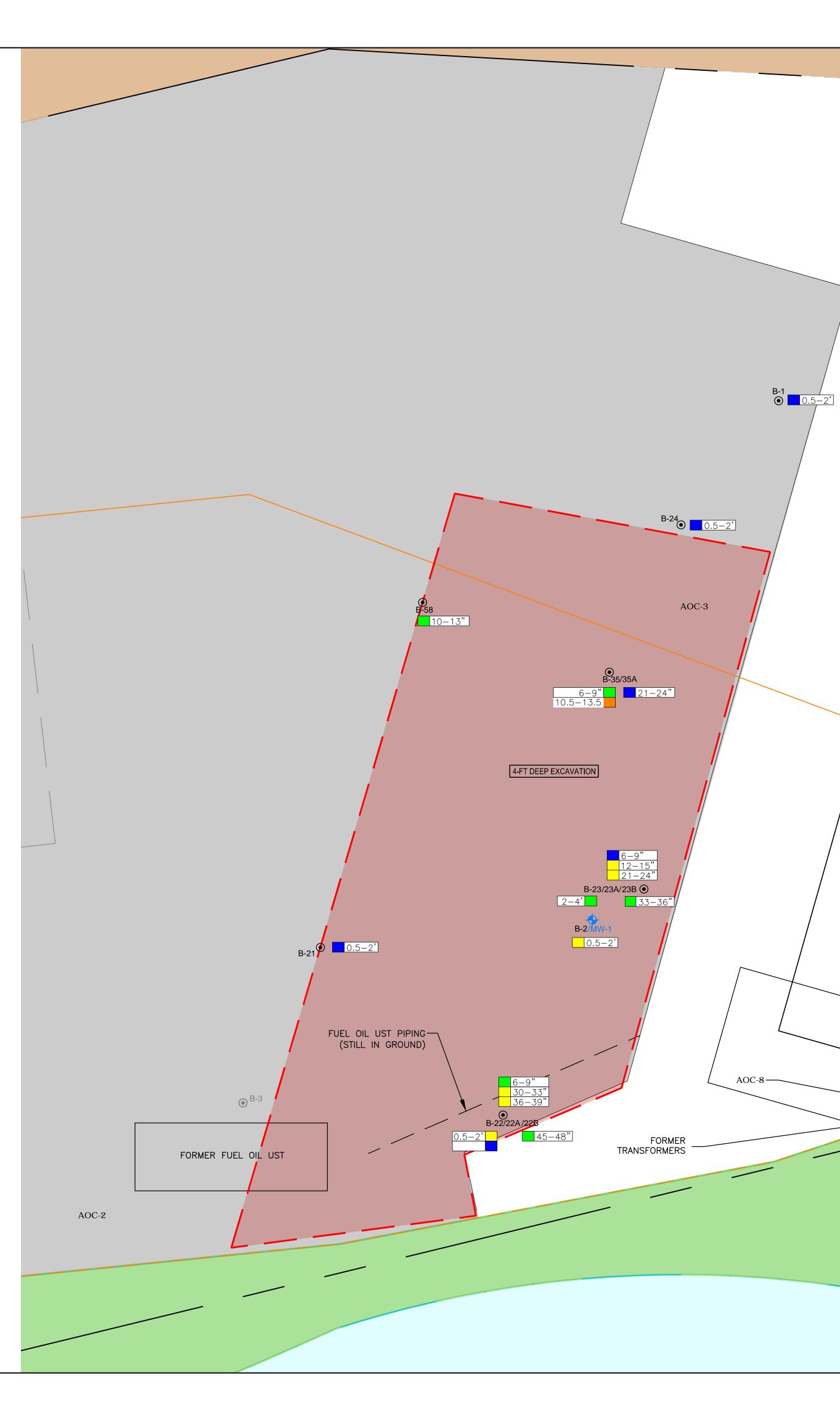
COLOR CODE

	PCBs ND
	PCBs <1 mg/kg
	PCBs >1 AND <10 mg/kg
	PCBs >10 AND <50 mg/kg
	PCBs >50 mg/kg

NOTES:

PROPERTY LINES ARE APPROXIMATE AND BASED ON THE TOWN OF VERNON PARCEL MAP FROM THEIR GIS WEBSITE.





		aal tumoto
• ^{B-18}		DATE PROPERTY OF IS SOLELY FOR ECIFIC PROJECT RRED, REUSED, DR ANY OTHER R MODIFICATION ILITY TO GZA.
	NO. ISSUE/DESCRIPTION BY UNLESS SPECIFICALLY STATED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE GZA GEOENVIRONMENTAL, INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING USE BY GZA'S CLIENT OR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPI AND LOCATION IDENTIFIED ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFE COPIED, OR ALTERED IN ANY MANNER FOR USE AT ANY OTHER LOCATION OR F PURPOSE WITHOUT THE PRIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, O TO THE DRAWING BY THE CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRES GZA, WILL BE AT THE USER'S SOLE RISK AND WITHOUT ANY RISK OR LIAB 98 EAST MAIN STREET VERDNONL DOOCKVILLEE CONNECCTIONT	DATE DATE DATE DATE DATE DATE DATE DATE
	VERNON-ROCKVILLE, CONNECTICUT PCB EXCAVATION AREA WEST OF BUILDING PREPARED BY: GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com PROJ MGR: BDR REVIEWED BY: CHECKED BY: DESIGNED BY: BDR DRAWN BY: MJS SCALE: AS SHOWN	JRE

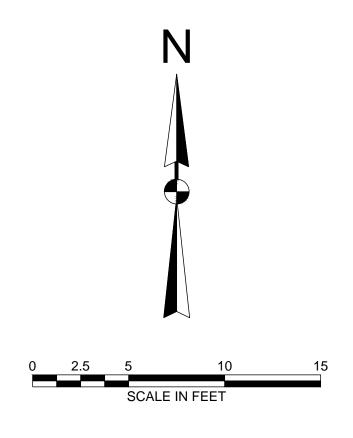
LEGEND APPROXIMATE PROPERTY BOUNDARY ● SOIL BORING ● SOIL BORING PCBs NOT ANALYZED ● GROUNDWATER MONITORING WELL AOC-1 AREA OF CONCERN I I I AOC-1 AREA OF CONCERN I ANDSCAPED/GRASS AREA I CONCRETE AREA I PROPOSED SOIL EXCAVATION AREA

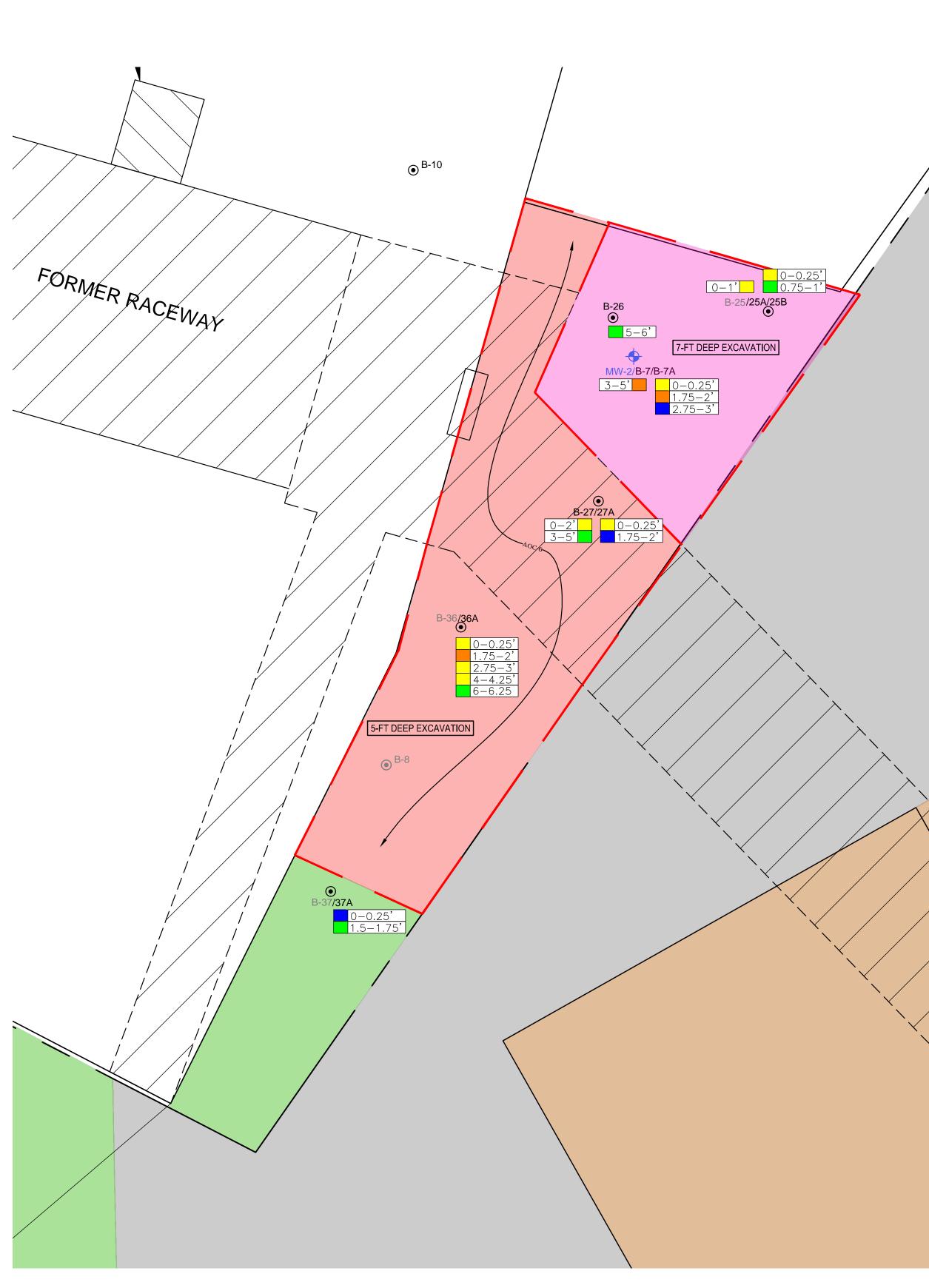
COLOR CODE

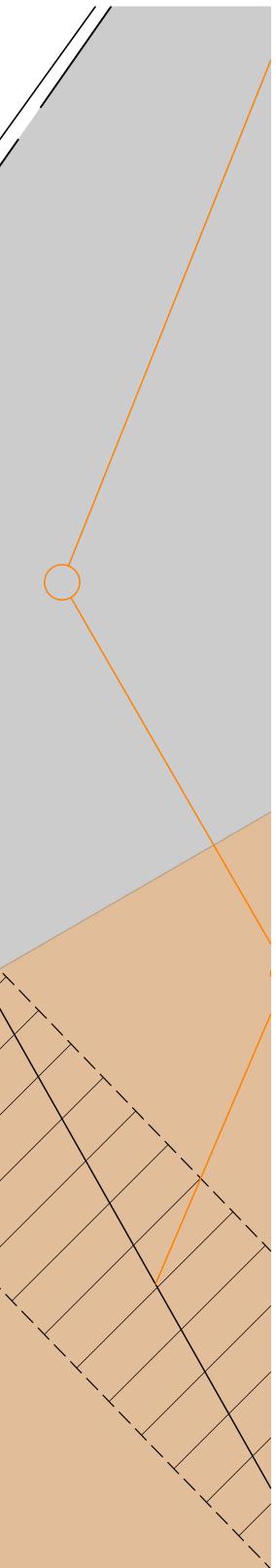
PCBs ND
PCBs <1 mg/kg
PCBs >1 AND <10 mg/kg
PCBs >10 AND <50 mg/kg
PCBs >50 mg/kg

NOTES:

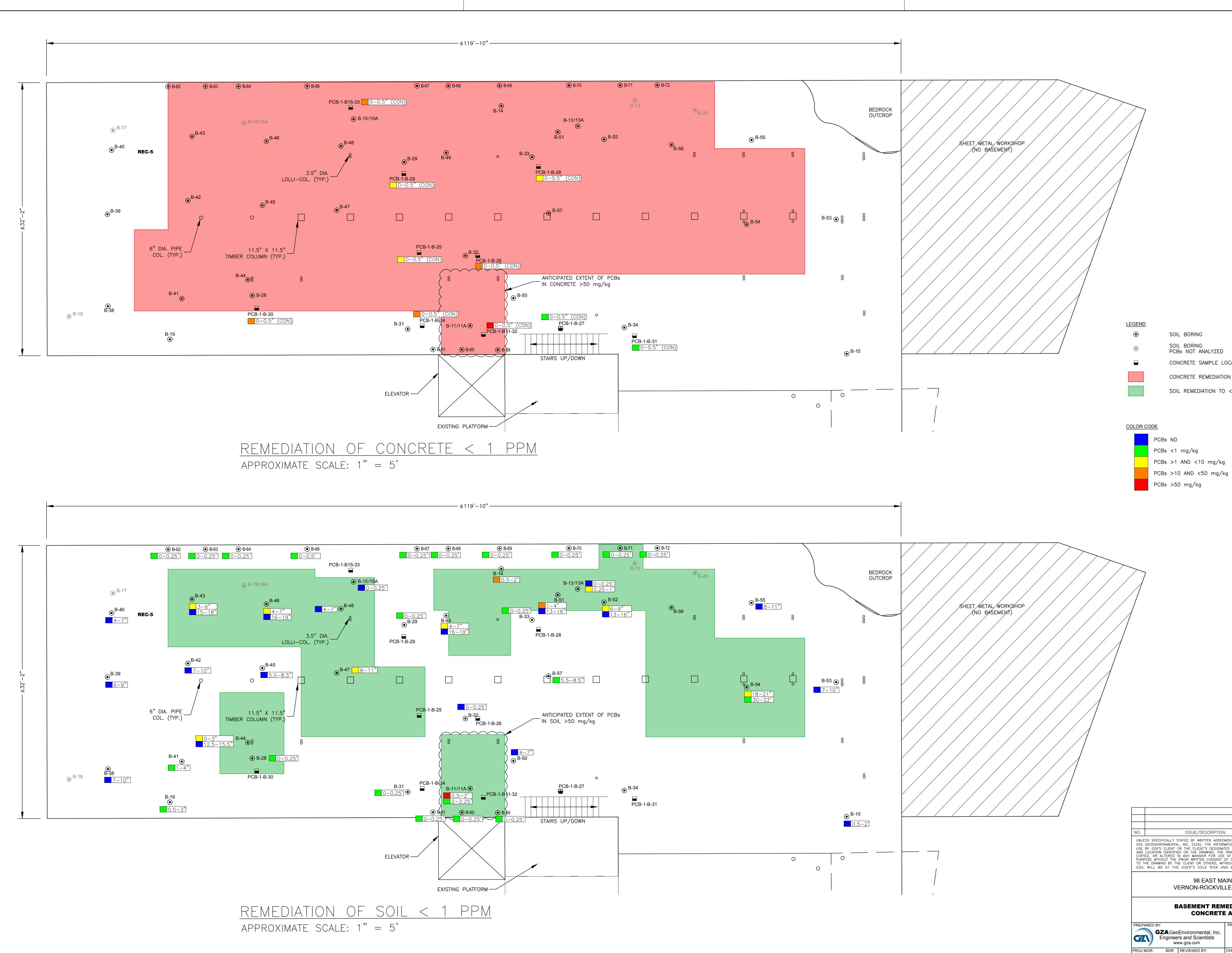
 PROPERTY LINES ARE APPROXIMATE AND BASED ON THE TOWN OF VERNON PARCEL MAP FROM THEIR GIS WEBSITE.

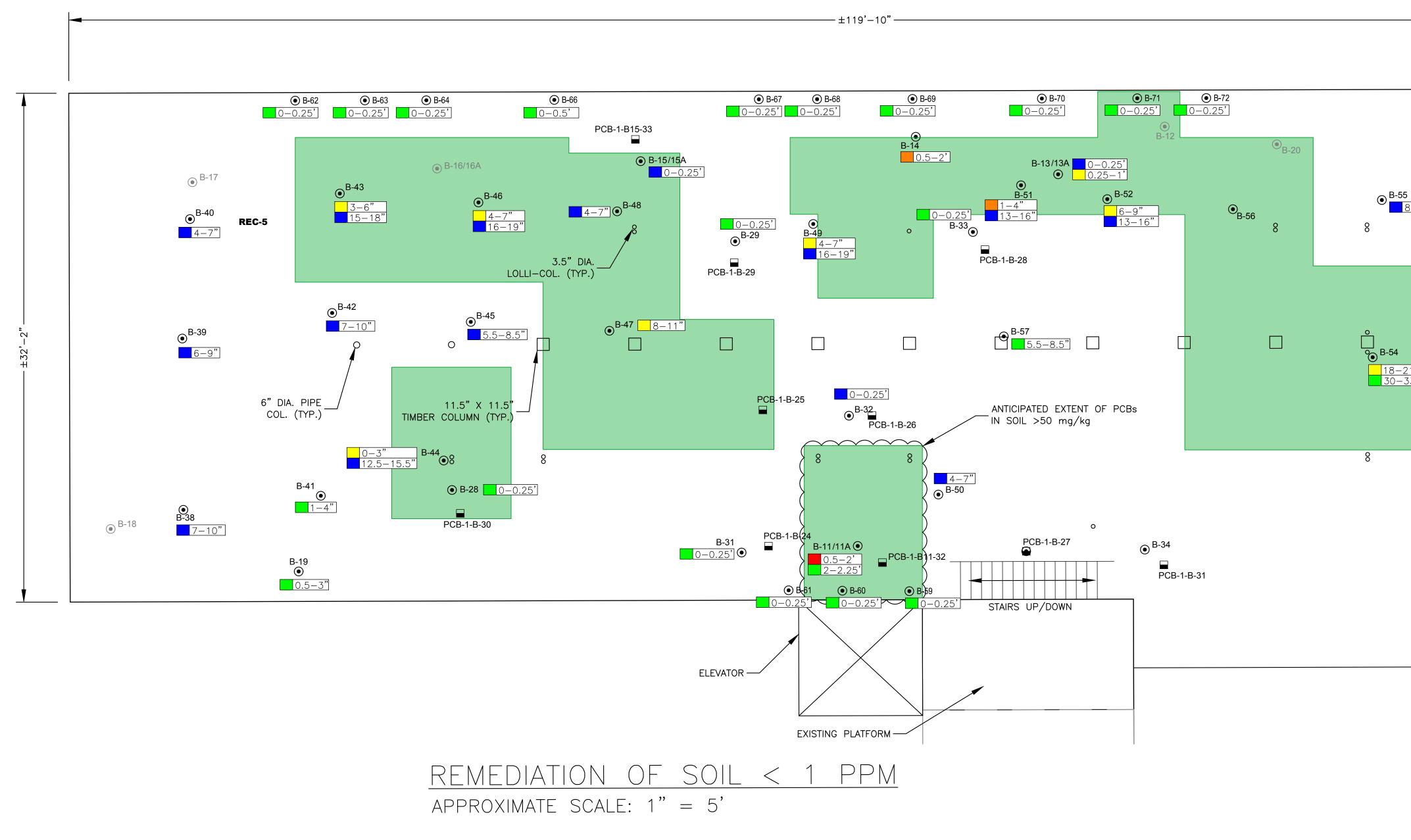






	1					
NO.			ISSUE/DESCRIPTION		BY	DATE
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98 EAST MAIN STREET VERNON-ROCKVILLE, CONNECTICUT						
PCB EXCAVATION AREA						
EAST OF BUILDING						
PREPARED BY:			PREPARED FOR:			
GZA GeoEnvironmental, Inc. Engineers and Scientists www.gza.com						
PROJ	MGR:	BDR	REVIEWED BY:	CHECKED BY:	FIGU	JRE
	NED BY:	BDR	DRAWN BY: MJS	SCALE: AS SHOWN		5
DATE:	11-16-20	<u></u>	PROJECT NO.	REVISION NO.	0.1555	J
	11-10-20	<u></u>	05.0045441.12		SHEET	I NU.





DESIGNED BY: BDR DRAWN PROJE DATE 11-16-2022

PCBs NOT ANALYZED CONCRETE SAMPLE LOCATION CONCRETE REMEDIATION TO <1 PPM SOIL REMEDIATION TO <1 PPM

ISSUE/DESCRIPTION	l	ΒY	DATE	
TED BY WRITTEN AGREEMENT, THIS DRAWING IS THE SOLE PROPERTY OF INC. (GZA). THE INFORMATION SHOWN ON THE DRAWING IS SOLELY FOR THE CLIENT'S DESIGNATED REPRESENTATIVE FOR THE SPECIFIC PROJECT ON THE DRAWING. THE DRAWING SHALL NOT BE TRANSFERRED, REUSED, ANY MANNER FOR USE AT ANY OTHER LOCATION OR FOR ANY OTHER RIOR WRITTEN CONSENT OF GZA. ANY TRANSFER, REUSE, OR MODIFICATION CLIENT OR OTHERS, WITHOUT THE PRIOR WRITTEN EXPRESS CONSENT OF USER'S SOLE RISK AND WITHOUT ANY RISK OR LIABILITY TO GZA.				
98 EAST MAIN STREET RNON-ROCKVILLE, CONNECTICUT				
	EDIATION PLA AND SOIL	N		
nvironmental, Inc. and Scientists v.gza.com	PREPARED FOR:			
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PROJECT NO.	REVISION NO.		U	
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APPENDIX A LIMITATIONS



USE OF REPORT

1. GZA GeoEnvironmental, Inc. (GZA) prepared this report on behalf of, and for the exclusive use of our Client for the stated purpose(s) and location(s) identified in the Proposal for Services and/or Report. Use of this report, in whole or in part, at other locations, or for other purposes, may lead to inappropriate conclusions; and we do not accept any responsibility for the consequences of such use(s). Further, reliance by any party not expressly identified in the agreement, for any use, without our prior written permission, shall be at that party's sole risk, and without any liability to GZA.

STANDARD OF CARE

- 2. GZA's findings and conclusions are based on the work conducted as part of the Scope of Services set forth in the Proposal for Services and/or Report and reflect our professional judgment. These findings and conclusions must be considered not as scientific or engineering certainties, but rather as our professional opinions concerning the limited data gathered during the course of our work. Conditions other than described in this report may be found at the subject location(s).
- 3. GZA's services were performed using the degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property. No warranty, expressed or implied, is made. Specifically, GZA does not and cannot represent that the Site contains no hazardous material, oil, or other latent condition beyond that observed by GZA during its study. Additionally, GZA makes no warranty that any response action or recommended action will achieve all of its objectives or that the findings of this study will be upheld by a local, state or federal agency.
- 4. In conducting our work, GZA relied upon certain information made available by public agencies, Client and/or others. GZA did not attempt to independently verify the accuracy or completeness of that information. Inconsistencies in this information which we have noted, if any, are discussed in the Report.

SUBSURFACE CONDITIONS

- 5. The generalized soil profile(s) provided in our Report are based on widely-spaced subsurface explorations and are intended only to convey trends in subsurface conditions. The boundaries between strata are approximate and idealized, and were based on our assessment of subsurface conditions. The composition of strata, and the transitions between strata, may be more variable and more complex than indicated. For more specific information on soil conditions at a specific location refer to the exploration logs. The nature and extent of variations between these explorations may not become evident until further exploration or construction. If variations or other latent conditions then become evident, it will be necessary to reevaluate the conclusions and recommendations of this report.
- 6. Water level readings have been made, as described in this Report, in and monitoring wells at the specified times and under the stated conditions. These data have been reviewed and interpretations have been made in this report. Fluctuations in the level of the groundwater however occur due to temporal or spatial variations in areal recharge rates, soil heterogeneities, the presence of subsurface utilities, and/or natural or artificially induced perturbations. The observed water table may be other than indicated in the Report.

COMPLIANCE WITH CODES AND REGULATIONS

7. We used reasonable care in identifying and interpreting applicable codes and regulations necessary to execute our scope of work. These codes and regulations are subject to various, and possibly contradictory, interpretations. Interpretations and compliance with codes and regulations by other parties is beyond our control.



SCREENING AND ANALYTICAL TESTING

- 8. GZA collected environmental samples at the locations identified in the Report. These samples were analyzed for the specific parameters identified in the report. Additional constituents, for which analyses were not conducted, may be present in soil, groundwater, surface water, sediment and/or air. Future Site activities and uses may result in a requirement for additional testing.
- 9. Our interpretation of field screening and laboratory data is presented in the Report. Unless otherwise noted, we relied upon the laboratory's QA/QC program to validate these data.
- 10. Variations in the types and concentrations of contaminants observed at a given location or time may occur due to release mechanisms, disposal practices, changes in flow paths, and/or the influence of various physical, chemical, biological or radiological processes. Subsequently observed concentrations may be other than indicated in the Report.

INTERPRETATION OF DATA

11. Our opinions are based on available information as described in the Report, and on our professional judgment. Additional observations made over time, and/or space, may not support the opinions provided in the Report.

ADDITIONAL INFORMATION

12. In the event that the Client or others authorized to use this report obtain additional information on environmental or hazardous waste issues at the Site not contained in this report, such information shall be brought to GZA's attention forthwith. GZA will evaluate such information and, on the basis of this evaluation, may modify the conclusions stated in this report.

ADDITIONAL SERVICES

13. GZA recommends that we be retained to provide services during any future investigations, design, implementation activities, construction, and/or property development/ redevelopment at the Site. This will allow us the opportunity to: i) observe conditions and compliance with our design concepts and opinions; ii) allow for changes in the event that conditions are other than anticipated; iii) provide modifications to our design; and iv) assess the consequences of changes in technologies and/or regulations.



APPENDIX B PUBLIC NOTICE INFORMATION



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GEOTECHNICAL ENVIRONMENTAL ECOLOGICAL WATER CONSTRUCTION MANAGEMENT

95 Glastonbury Boulevard 3rd Floor Glastonbury, CT o6o33 T: 86o.286.8900 F: 86o.633.5699 www.qza.com CERTIFIED MAIL RETURN RECEIPT REQUESTED

April 13, 2023 File No. 05.0045441.12

Ms. Patrice Sulik Director of Health North Central District Health Department 31 North Main Street Enfield, CT 06082

Re: Public Notification of Remedial Activities Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Dear Ms. Sulik:

Pursuant to Connecticut General Statutes Section 22a-133k-1(d)(1), the Town of Vernon, hereby gives public notice of intent to undertake remediation at the former Daniel's Mill property located at 98 East Main Street in Vernon, Connecticut (REM ID# 14919) pursuant to Connecticut General Statutes 22a-133k-1 through 3. The purpose of the remediation is to 1) remove soil from certain exterior areas impacted by polychlorinated biphenyls, certain metals, and petroleum related substances via excavation and offsite disposal; 2) remove soil from beneath the basement floor of the former mill building impacted by polychlorinated biphenyls via excavation and offsite disposal; and 3) render certain subslab soils impacted by petroleum-related substances and certain metals inaccessible at the property using an Environmental Use Restriction. Remediation is anticipated to begin in mid to late 2023 and be completed in late 2023. Interested persons may obtain a copy of the Remedial Action Plan (RAP) and/or provide comments to the proposed activities by contacting the undersigned. Public comments on the RAP may be submitted, in writing or via electronic mail, within 30 days of publication of this notice. This notice is for your information only and no action is required on your part.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

David J. Rusczyk, P.E. Associate Principal Email: david.rusczyk@gza.com Phone: 860-858-3110





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ECOLOGICAL WATER CONSTRUCTION MANAGEMENT

95 Glastonbury Boulevard 3rd Floor Glastonbury, CT 06033 T: 860.286.8900 F: 860.633.5699 www.qza.com April 13, 2023 File No. 05.0045441.12

Mr. Shaun Gately Economic Development Coordinator Town of Vernon 55 West Main Street, 2nd Floor Vernon, CT 06066

Re:

Public Notification of Remedial Activities Former Daniel's Mill 98 East Main Street Vernon, Connecticut

Dear Mr. Gately:

Pursuant to Connecticut General Statutes Section 22a-133k-1(d)(1), the Town of Vernon, hereby gives public notice of intent to undertake remediation at the former Daniel's Mill property located at 98 East Main Street in Vernon, Connecticut (REM ID# 14919) pursuant to Connecticut General Statutes 22a-133k-1 through 3. The purpose of the remediation is to 1) remove soil from certain exterior areas impacted by polychlorinated biphenyls, certain metals, and petroleum related substances via excavation and offsite disposal; 2) remove soil from beneath the basement floor of the former mill building impacted by polychlorinated biphenyls via excavation and offsite disposal; and 3) render certain sub-slab soils impacted by petroleum-related substances and certain metals inaccessible at the property using an Environmental Use Restriction. Remediation is anticipated to begin in mid to late 2023 and be completed in late 2023. Interested persons may obtain a copy of the Remedial Action Plan (RAP) and/or provide comments to the proposed activities by contacting the undersigned. Public comments on the RAP may be submitted, in writing or via electronic mail, within 30 days of publication of this notice. This notice is for your information only and no action is required on your part.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

David J. Rusczyk, P.E. Associate Principal Email: david.rusczyk@gza.com Phone: 860-858-3110

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ENVIRONMENTAL CLEAN UP IN PROGRESS FOR FURTHER INFORMATION CONTACT: DAVID RUSCZYK GZA GEOENVIRONMENTAL, INC. 95 GLASTONBURY BLVD, GLASTONBURY, CT 06033 860-858-3110 David.rusczyk@gza.com



GZA GeoEnvironmental, Inc.