

Russell T. Posthauer, Jr., P.E., *President*
Michael J. Lillis, P.E., *Vice President*
Steven C. Sullivan, P.E., *Vice President*
Richard A. Bunnell, R.L.S.
Abigail Adams, R.L.A.
Ralph A. Klass, P.E., L.E.P.
Paul J. Connelly, L.E.P.
Nancy Levesque, P.E.
C.J. Osborne, III, R.L.S.
Joseph W. Whynott, R.L.S.
Richard W. Howard, Jr., P.E. *in memoriam*



40 Old New Milford Road
Brookfield, CT 06804
tel 203-775-6207
fax 203-775-3628
www.ccaengineering.com
mail@ccaengineering.com



**PHASE I
ENVIRONMENTAL SITE ASSESSMENT REPORT
NEW MILFORD PUBLIC WORKS SITE
6 & 20 YOUNG'S FIELD ROAD
NEW MILFORD, CONNECTICUT**

Prepared for:

**Mr. Luigi Fulinello
Economic Development Director
Town of New Milford
10 Main Street
New Milford, Connecticut 06776**

Prepared by:

**CCA, LLC
40 Old New Milford Road
Brookfield, Connecticut 06804**

**October 2014
Project No. 8714.01**

TABLE OF CONTENTS

EXECUTIVE SUMMARY	<i>i</i>
1.0 INTRODUCTION	1
1.1 PHASE I SCOPE OF SERVICES	1
2.0 USER PROVIDED INFORMATION.....	3
2.1 TITLE RECORDS, ENVIRONMENTAL LIENS, SPECIALIZED KNOWLEDGE & VALUE REDUCTION ISSUES.....	3
2.2 REASON FOR PERFORMING THE PHASE I ESA	3
2.3 OTHER	3
3.0 SITE DESCRIPTION.....	4
3.1 SITE LOCATION	4
3.2 SITE DESCRIPTION AND ADJACENT PROPERTIES	4
4.0 ENVIRONMENTAL SETTING	7
4.1 SURFICIAL AND BEDROCK GEOLOGY	7
4.2 WATER QUALITY CLASSIFICATION	7
5.0 SITE RECONNAISSANCE.....	10
5.1 EXTERIOR CONDITIONS	10
5.2 BUILDING INTERIOR CONDITIONS	12
6.0 INTERVIEWS	15
6.1 INTERVIEW WITH CURRENT PROPERTY OWNER	15
6.2 INTERVIEW WITH PAST OWNERS, OPERATORS, AND OCCUPANTS	15
6.3 INTERVIEW WITH GOVERNMENT AGENCIES	15
7.0 HISTORIC USE.....	16
7.1 SITE OWNERSHIP AND HISTORICAL USE	16
7.2 SANBORN MAPS, TOPOGRAPHIC MAPS, AND AERIAL PHOTOS REVIEW SUMMARY	17
7.3 HISTORICAL WASTE HANDLING/DISPOSAL.....	21
7.4 HISTORICAL UTILITIES USAGE	21
7.5 OBSERVATIONS RELATED TO HISTORICAL SITE USE.....	22
8.0 RECORDS REVIEWED.....	23
8.1 PREVIOUS ENVIRONMENTAL REPORTS	23
8.2 COMPUTER DATABASE SEARCH	23
8.3 CTDEEP RECORDS DATABASE/FILE REVIEW	25
8.4 SUMMARY OF COMPUTER DATABASE AND CTDEEP STANDARD ENVIRONMENTAL RECORDS SOURCES REVIEW FOR THE SUBJECT SITE AND SURROUNDING VICINITY	25
8.5 SUMMARY OF CTDEEP, LOCAL, & SITE DOCUMENTS REVIEWED.....	35
8.6 EVALUATION OF STATE/FEDERAL/LOCAL/SITE DATA RELATIVE TO POTENTIAL CONTAMINANT SOURCES AND REGULATORY COMPLIANCE CONCERNS.....	40
9.0 EVALUATION	42
9.1 POTENTIAL ON-SITE SOURCES OF CHEMICAL CONTAMINATION	42
9.2 POTENTIAL OFF-SITE SOURCES OF CHEMICAL CONTAMINATION	43
9.3 REGULATORY COMPLIANCE CONCERNS.....	43
9.4 RECOMMENDATIONS.....	44
10.0 LIMITATIONS.....	45

APPENDICES:

- A Figures, Photographs, & Survey Maps
- B Site/Local Records
- C CTDEEP Records
- D EDR Inc. Report
- E CCA Qualification Summary

EXECUTIVE SUMMARY

A Phase I Environmental Site Assessment (ESA) has been performed for the site located at 6 and 20 Young's field Road, New Milford Connecticut. The subject site consists of the entire parcel of land located at 20 Young's field Road (Assessor's Map 35.1, Lot 60) and the northernmost portion of the parcel of land located at 6 Young's Field Road (Assessor's Map 28.4, Lot 10), which are non-contiguous and separated by 8 Young's Field Road (Assessor's Map 35.2, Lot 4). The 20 Young's Field Road parcel is used for road maintenance materials storage (i.e. road salt, gravel, catch basin frames, etc.), the Town of New Milford recycling center, a truck wash, and the Town of New Milford Facilities Maintenance headquarters and workshop. The northernmost portion of the 6 Young's Field Road parcel is used as the Town of New Milford Public Works highway maintenance garage and headquarters, and contains six buildings, designated as the Bradin Building and Building Nos. 1 through 5. The southern portion of the 6 Young's Field Road parcel is used for recreational purposes (i.e. ball fields, etc.) and is not for the purposes of the ESA described herein part of the subject site. The primary purpose of this assessment was to evaluate historic and current on-site activities relative to potential adverse environmental impacts on or adjacent to the study site.

The subject site parcels are serviced by the municipal sanitary sewer system. The northern portion of the 6 Young's Field Road parcel is serviced by an on-site water supply well, while the 20 Young's Field Road parcel is connected to a public water supply system. Electricity, natural gas, and oil heat also service the subject site parcels. The oil heat, which services some of the site buildings on the 6 Young's Field Road parcel, is supplied by heating fuel oil above-ground storage tanks (ASTs). Heating fuel oil was formerly stored in underground storage tanks (USTs) that have been removed. The northern portion of the 6 Young's Field Road parcel subject site formerly contained motor fuel USTs and a fuel station that were removed circa 1989-1991.

The findings of this ESA indicate that the northern portion of the 6 Young's Field Road parcel appears to have been used by the Town of New Milford Public Works highway maintenance garage and headquarters since at least circa the early 1950s.

The southern portion of the 20 Young's Field Road parcel subject site has apparently been used for the storage of road salt stock piles and other miscellaneous storage since circa 1990. This portion of the site appears to have been undeveloped from circa 1951 through 1990. Early twentieth century use of this portion of the subject site, when it was owned by one or more rail road entities, was as a spur yard, turntable, and roundhouse.

The recycling center on the northern portion of the 20 Young's Field Road parcel appears to have been in operation since circa the mid to late 1980s. The recycling center, in addition to such items as newspapers, bottles, and cans, also collects for off-site disposal waste oil and "household hazardous waste". Previous to that use of that portion of the site, it appears to have been used for salt storage since circa 1975.

The northern-most portion of the 20 Young's Field Road parcel, currently occupied by New Milford Facilities Maintenance headquarters and shop, appears to have been previously occupied by New Milford Ambulance from circa 1985 to some time in the 1990s or 2000s. Previous to occupation by New Milford Ambulance, the northern portion of the parcel appears to have used as a residence.

The majority of the subject site is located in a Connecticut Department of Energy and Environmental Protection (CTDEEP) "GB" groundwater classification area, meaning that the groundwater beneath the subject site is presumed unsuitable for human consumption without treatment. Generally, sites that are located within "GB" groundwater classification areas are subject to less stringent standards for the remediation of polluted environmental media than are sites located within areas where the groundwater is presumed suitable as a consumptive resource, classified as "GA" by the CTDEEP. The northernmost portion of the site (on the 20 Young's Field Road parcel) is located CTDEEP "GA" groundwater classification area.

Certain information obtained during this Phase I ESA indicates possible qualification of the 6 Young's Field Road parcel as a hazardous waste "establishment" under the Property Transfer Law of Connecticut (Connecticut General Statutes (CGS) Sections 22a-134 through 22a-134e). Whether this information constitutes qualification of the parcel as an "establishment" under the law is should be determined by qualified legal counsel experienced with the Property Transfer Law. Hazardous waste "establishments" are required to enter the CTDEEP Property Transfer Program upon certain ownership changes. The PTP is a CTDEEP formal remediation program and as such, transferred hazardous waste "establishments" are subject to investigation and remediation if indicated by investigation of site environmental media in accordance with the prevailing guidelines (prescribed by CTDEEP) and to eventual compliance with the Connecticut Remediation Standards Regulations (the RSRs – Regulations of Connecticut State Agencies (RCSA) Sections 22a-133k-1 through 22a-133k-3). For sites that are not in formal CTDEEP remediation programs, the RSRs are applied as general guidance and accordance with the satisfaction of any parties with interest in such a site.

While there is ample indication of off-site "high risk" land use and activity in the vicinity of the subject site, there were no specific conditions identified during the ESA described herein at a location that would be expected to present a material threat of potential significant offsite source impacts to the subject site. It is noted however that undisclosed, undocumented, or undiscovered conditions may exist that could have affected the subject site. Off-site sources of groundwater contamination at a given parcel are not the responsibility of the owner or occupant of such parcel per CTDEEP policy. Furthermore, ingestion or direct exposure risk associated with any impacted groundwater beneath the subject site would be mitigated by connection to a public water supply (as at the 20 Young's Field Road parcel).

The following specific environmental Areas of Concern (AOCs) for the subject site have been identified as a result of the Phase I ESA described herein:

For the 6 Young's Field Road Parcel:

The former motor fuel USTs and fueling station, which were formerly located to the east of Building No. 5 (i.e. since there is no confirmatory soil quality data associated with their closure);

An apparent zone of contaminated soils that was left to remain in place at the completion of a leaking UST (LUST) soil remediation to the north of Building No.1 (where a passive venting system installed);

A floor drain observed inside the Bradin Building (need to confirm that is discharges to the sanitary sewer);

Any current or former hazardous material storage and handling areas, mostly associated with vehicle maintenance in and around the buildings, including but not necessarily limited to ASTs (fuel oil, diesel (for emergency generators), and waste oil), overhead doorways and other portals; and,

An apparent area of oil staining and fill to the rear of Buildings Nos. 2 and 3.

For the 20 Young's Field Road Parcel:

A catch basin sediment disposal pit located on the southern portion of the parcel where currently there is also road salt storage and other miscellaneous outdoor storage (since catch basin sediments are often associated with poly-aromatic hydrocarbons (PAHs), gross petroleum hydrocarbons (PHCs) and metals);

An apparent fill area located along Young's Field Road at the southern end of the parcel (because of unknown source and quality);

Current and past recycling center hazardous material collection and handling areas (documentation indicates a past hazardous material collection and handling area over exposed ground surface on the northeast corner of the recycling center site, which may be the same location as the current area);

The historic railroad spur yard, turntable, and roundhouse on the southern portion of the parcel (since railroad yards are often associated with impact to soil by PHCs, poly-chlorinated biphenyls (PCBs), and metals, primarily arsenic); and,

Current and historical outdoor road salt storage areas, particularly if there are any consumptive water supplies nearby.

It is noted that due to the age of the subject site buildings, lead based paint (LBP), asbestos containing materials (ACMs), and other hazardous building materials (e.g. caulking with PCBs) may be present.

Additionally, it is noted that undisclosed, undocumented, or undiscovered conditions may exist that could have affected the subject site.

The above described AOCs are of the general type cited in the CTDEEP Site Characterization Document, dated September 2007, because of the potential of intentional improper discharge or accidental spillage, seepage, etc. of contaminating substances in such areas. The CTDEEP Draft Site Characterization Document is the current prevailing reference standard for surface/subsurface investigations in the State of Connecticut.

Pursuant to the findings of the Phase I ESA, CCA offers the following recommendations for further action and investigation:

Qualified legal counsel familiar with the Connecticut Property Transfer Law should be consulted to determine the status of the 6 Young's Field Road parcel as a hazardous waste "establishment" under that law. In addition, the status relative to the Property Transfer Law of the 20 Young's Field Road parcel due to the presence of the recycling center should be evaluated since "household hazardous waste" is collected there for disposal.

Dependent upon the environmental liability risk tolerance of any parties associated with the

subject site, CCA recommends a “Phase II ESA” subsurface soil and groundwater quality investigation of the subject site AOCs. A Phase II ESA investigation would involve the performance of soil test borings for the purpose of soil sample collection, screening and laboratory analyses for Substances of Concern (SOCs) commonly associated with the site AOCs (e.g. VOCs, PHCs, etc.), and the installation of shallow groundwater monitoring wells, followed by the collection of groundwater samples for analyses of the site SOC.

If the subject site buildings are to be demolished or renovated, an appropriate survey for the presence of ACMs and LBP (and other hazardous building materials) should be performed.

1.0 INTRODUCTION

In October 2014, CCA, LLC (CCA) was retained by the Town of New Milford to perform a Phase I Environmental Site Assessment (ESA) of the site located at 6 and 20 Young's field Road, New Milford Connecticut. The subject site consists of the entire parcel of land located at 20 Young's field Road (Assessor's Map 35.1, Lot 60) and the northernmost portion of the parcel of land located at 6 Young's Field Road (Assessor's Map 28.4, Lot 10), which are non-contiguous and separated by 8 Young's Field Road (Assessor's Map 35.2, Lot 4). The 20 Young's Field Road parcel is used for road maintenance materials storage (i.e. road salt, gravel, catch basin frames, etc.), the Town of New Milford recycling center, a truck wash, and the Town of New Milford Facilities Maintenance headquarters and workshop. The northernmost portion of the 6 Young's Field Road parcel is used as the Town of New Milford Public Works highway maintenance garage and headquarters. The southern portion of the 6 Young's Field Road parcel is used for recreational purposes (i.e. ball fields, etc.) and is not for the purposes of the ESA described herein part of the subject site. The subject site Figure 1 in Appendix A illustrates the (two) location(s) of the study site. The primary purpose of this assessment was to evaluate historic and current on-site activities relative to potential adverse environmental impacts on or adjacent to the study site.

1.1 PHASE I SCOPE OF SERVICES

This Phase I environmental site assessment included the following scope of services:

A. In-House Site Background Review

CCA performed a detailed review of in-house published background information on the environmental setting of the subject site area.

B. On-Site Inspection

CCA conducted a visual walkover inspection of the site and a drive-by surveillance of the surrounding area for presence of existing and/or potential on-site and off-site sources of environmental degradation and regulatory compliance concerns.

C. Computer Database Search and Local/State Regulatory Agency File Review

Standard environmental record sources (i.e., publications, databases) were reviewed in accordance with Connecticut Department of Energy and Environmental Protection (CTDEEP – formerly known as the Connecticut Department of Environmental Protection (CTDEP)) guidelines and ASTM E 1527-13, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (8.2.1, 8.2.2).

A federal/state database search was performed by CCA prior to visiting local and state regulatory agency offices using the Environmental Data Resources Inc. (EDR) on-line environmental database service.

CCA visited or contacted the Town of New Milford municipal offices, the Connecticut State Library (CSL), and the CTDEEP records room (open to the public) for the purpose of reviewing available files and other pertinent materials relevant to environmental conditions at the subject site and surrounding properties.

Town of New Milford municipal offices visited or contacted included the following:

- Tax Assessor
- Town Clerk
- Planning & Zoning
- Building Department
- Health Department
- Fire Marshal
- Public Works

State of Connecticut DEEP bureaus/file desks visited included the following:

- PCB (poly-chlorinated biphenyls) Program file listings.
- Environmental Quality Records File Room:
 - Superfund (CERCLA);
 - Site Remediation;
 - Property Transfer Program (PTP); and
 - Water Permit List & Files.
 - Solid Waste Management;
 - Underground Storage Tank (UST) and Leaking Underground Storage Tank (LUST) Lists & Files;
 - Emergency Response and Spill Prevention Division (ERSPD) Oil and Chemical Spill (OCS) reports (pre-1991) and Correspondence files (all years deemed necessary by reported releases); and
 - Resource Conservation and Recovery Act (RCRA; a/k/a "Hazardous Waste").
- Public Access Computer Databases:
 - Hazardous Waste Manifests
 - OCS reports (Pre-1991), and
 - Leaking Underground Storage Tank Sites.

The following sections of this report summarize data collected during the assessment and CCA's derived conclusions/recommendations regarding the subject site.

2.0 USER PROVIDED INFORMATION

2.1 *TITLE RECORDS, ENVIRONMENTAL LIENS, SPECIALIZED KNOWLEDGE & VALUE REDUCTION ISSUES*

The Town of New Milford, the user of this Phase I ESA, has not apprised CCA of any environmental concerns associated with title records or environmental liens, specialized knowledge, or of any reason for a reduction in the subject site property value.

2.2 *REASON FOR PERFORMING THE PHASE I ESA*

The Phase I ESA described herein was performed as part of due diligence in anticipation of redevelopment of the subject site.

2.3 *OTHER*

The user or users of this report, to the best of CCA's knowledge, is not aware of any additional direct information regarding the subject site that would indicate any environmental conditions on the subject site that would present a material liability risk.

3.0 SITE DESCRIPTION

3.1 SITE LOCATION

(See Appendix A, Figure 1 for Location Map)

A. Site Address:

6 & 20 Young's Field Road
New Milford, Connecticut

B. Tax Assessor's Property Reference:

6 Young's Field Road: Map 28.4; Lot 10
20 Young's Field Road: Map 35.1; Lot 60

C. Zoning Map Classification of Site:

6 Young's Field Road: B-1 (Restricted Business)
20 Young's Field Road: B-1 (Restricted Business) (southern portion of parcel)
 & R-40 (Residential) (northern portion of parcel)

D. United States Geological Survey (USGS) Quadrangle:

New Milford, Connecticut

3.2 SITE DESCRIPTION AND ADJACENT PROPERTIES

(See Appendix B for copies of current Tax Assessor's field cards for subject site.)

A. Total Acreage:

6 Young's Field Road:

14.0 Acres (total parcel acreage – subject site is approx. 25% of parcel total)

20 Young's Field Road:

4.24 Acres

B. Topographic Gradient Description:

The subject site is primarily flat with the exception of a steep embankment along Young's Field Road at the southwest portion of the 20 Young's Field Road parcel. Overall regional gradient is downward to the west-southwest.

C. *Site Buildings, Roadways, and Parking Areas:*

6 Young's Field Road:

The parcel contains six buildings designated by the numbers one (1) through five (5) and the "Bradin Building", along with associated paved and gravel drives and parking areas. Building Nos. 1 through four 4 are used primarily to park highway maintenance vehicles (plow trucks, sanders, etc.), while Building No. 5 contains administrative offices and a vehicle maintenance and repair shop. Building No. 1 also contains office space, a kitchen, and restrooms. Building No. 2 also contains a road sign shop. Building No. 4 also contains a welding shop. The "Bradin Building" is used for miscellaneous storage (landscaping equipment and tools, bags of concrete, road signs, construction equipment, piping, etc.).

20 Young's Field Road:

The parcel contains one building used by the Town of New Milford Facilities Maintenance (maintenance of Town buildings, etc.) as an office headquarters and a workshop. There is also a large barn-like structure that is currently used as a truck wash (formerly used for road salt storage), a shed, a canopy and several storage containers associated with the Town recycling center, and a large canopy for the storage of treated road salt. The northern portion of the parcel, containing the Facilities Maintenance building, truck wash, and recycling center, is largely paved whereas the southern portion of the parcel, used for road salt storage and other outdoor storage (i.e. gravel, catch basin frames, etc.), is largely unpaved.

D. *Current Site Occupants/Use:*

The subject site is occupied by various Town of New Milford Public Works facilities (i.e. the highway maintenance garage(s), the Town of New Milford recycling center, and the Town of New Milford Facilities Maintenance department.

E. *Utilities:*

6 Young's Field Road:

The parcel buildings are serviced by electricity, municipal sanitary sewers and an on-site water supply well. Building Nos. 1, 2, and 3 are serviced by oil heat, while building Nos. 4 and 5 are serviced by gas heat. The Bradin Building is not heated.

20 Young's Field Road:

The parcel buildings are serviced by electricity, municipal sanitary sewers and the local public water supply company. The Facilities Maintenance building is serviced by gas heat. The truck wash building waste water is treated by an oil/grit-water separator before the discharge to the municipal sanitary sewer system.

F. *On-Site Drainage, Surface Water, Wetlands or Lagoons (current and historical):*

On-site drainage would follow surface topography. Therefore, overall subject site area drainage is to the west-southwest, toward the Housatonic River and the West Aspetuck River (see topographic Site Location Map, Figure 1 in Appendix A). A small strip of apparent wetlands was observed along the railroad to the northeast of the 20 Young's Field Road parcel

G. *Flood Insurance Rating Classification, FIRM (090049 0011D - 6/4/1987):*

The subject site is mapped as being within Zones X and A, which are areas determined to be outside of the 500-year and within the 100-year flood zones, respectively (note: there are several classes of Zones X and A). Generally, areas on the subject site with lower elevations toward the Housatonic river are prone to flooding.

H. *Adjacent Site Usages:*

6 Young's Field Road:

North: Town roadway; Superior Plus Energy Services bulk storage heating fuel oil depot; and Town of New Milford gasoline/diesel fueling station.

East: Town roadway; railroad; and then miscellaneous commercial beyond the railroad.

South: Recreational (Young's Field ball park).

West: Young's Field Road; roadside parking; and small strip of wooded land and Housatonic River.

20 Young's Field Road:

Northwest: Housatonic Avenue; and undeveloped lot used for miscellaneous outdoor storage by the Town of New Milford.

Northeast: Railroad; and then residential and miscellaneous commercial beyond the railroad.

Southeast: Superior Plus Energy Services bulk storage heating fuel oil depot; and Town of New Milford gasoline/diesel fueling station.

Southwest: Young's Field Road; undeveloped wooded land; Superior Plus Energy Services office/headquarters and liquid propane gas (LPG) storage yard; and apparent abandoned Mitchell fuel bulk storage depot.

4.0 ENVIRONMENTAL SETTING

4.1 SURFICIAL AND BEDROCK GEOLOGY

According to the "Surficial Materials Map of Connecticut" (Janet Radway Stone, et. al., 1992), the surficial geologic materials beneath the subject site has been mapped as glacial meltwater deposit of sand and gravel over fines (very fine sand, silt, and clay) and gravel over fines, with possible post-glacial alluvial deposits in certain areas.

The subject parcel appears to lie over the Stockbridge Marble, a white to gray dolomitic marble (Bedrock Geologic Map of Connecticut, John Rodgers, 1985).

4.2 WATER QUALITY CLASSIFICATION

A. *Drainage Basin Reference:*

Majority of the subject site:

6000 Housatonic River Basin; 60 Housatonic Main Stem Regional Basin; 6 Housatonic Major Basin

Northernmost portion of subject site:

6500 Aspetuck River Basin; 65 Aspetuck Regional Basin; 6 Housatonic Major Basin

B. *Inferred Groundwater and/or Surface Water Flow Direction:*

Preliminary estimates of groundwater flow directions usually consider surface topography and nearby surface water bodies, although it is noted that other physical conditions may also affect groundwater flow (i.e., aquifer hydraulic characteristics, pumping wells, recharge/discharge effects, etc.). Based upon observed topographic gradients, the inferred overall natural direction of groundwater flow beneath the subject site would be to the west, toward the Housatonic River and the West Aspetuck River (the West Aspetuck River flows into the Housatonic River near the northern portion of the western subject site property boundary).

C. *Groundwater Classification:*

The CTDEEP developed a system by which they have evaluated and classified all groundwater in the State. The CTDEEP also set goals for maintaining the quality level of groundwater. Groundwater for the majority of the site (i.e. in the 6000 Housatonic River Basin) is classified as "GB" (Water Quality Classifications, Housatonic River, Hudson River, and Southwest Coastal Basins map, April 8, 1997). Therefore the majority of the site is subject to "GB" Groundwater Quality Standards.

Based on CTDEEP's "*Water Quality Standards*" (Effective April 12, 1996 (Groundwater Quality Standards) and February 25, 2011 (Surface Water Quality Standards), the "GB" classification corresponds with the following:

GB - Groundwater Quality Standards (WQS):

- GW4 standard:** The policy of the Department in areas classified as GB is:
- a) to eliminate or reduce in the ground water any pollutant which presents a hazard of fire explosion, or toxic or hazardous emission to the environment or otherwise poses a threat to public safety or an unacceptable risk to public health, and
 - b) to maintain the ground water at a quality that will not adversely affect the quality of the surface waters to which such ground water discharges or prevent the maintenance or attainment of any designated or existing uses in such surface waters, and
 - c) to maintain a quality consistent with all designated and existing uses of the ground water, including its use for drinking without treatment if such ground water has, prior to the adoption of these WQS, been utilized for, and continues to be utilized, for drinking water, and
 - d) to regulate discharges to the ground water in order to prevent further degradation of ground water quality

GB - Groundwater Uses & Classification:

- Designated Uses:** Industrial process water and cooling waters; baseflow for hydraulically- connected surface water bodies; presumed not suitable for human consumption without treatment
- Classification:** Groundwater within a historically highly urbanized area or an area of intense industrial activity and where public water supply service is available. Such ground water may not be suitable for human consumption without treatment due to waste discharges, spills or leaks of chemicals or land use impacts.

Groundwater for northernmost portion of the site (i.e. in the 6500 Aspetuck River Basin) is classified as "GA" (Water Quality Classifications, Housatonic River, Hudson River, and Southwest Coastal Basins map, April 8, 1997). Therefore the northernmost portion of the site is subject to "GA" Groundwater Quality Standards. Based on CTDEEP's "*Water Quality Standards*" (Effective April 12, 1996 (Groundwater Quality Standards) and February 25, 2011 (Surface Water Quality Standards), the "GB" classification corresponds with the following:

GA - Groundwater Quality Standards (WQS):

GW1 standard: The policy of the CTDEEP in areas that are classified as GAA or GA is to maintain or restore all groundwater in such areas to its natural quality.

GW2 standard: If the Commissioner determines that, with respect to a specific pollutant, restoring or maintaining natural quality at a GAA or GA level is not technically practicable, the CTDEEP's policy is to:

a) Maintain or restore quality such that groundwater is suitable for drinking uses without treatments, and

b) Maintain or restore quality such that the groundwater will not adversely affect surface water quality or prevent the maintenance or attainment of any designated uses of surface waters to which that groundwater discharges, and

c) Eliminate sources of pollution to such groundwater to the extent that the Commissioner determines to be technically practicable, and regulate discharges to such groundwater so as to prevent pollution.

GAA - Groundwater Uses & Classification:

Designated Uses: Existing or potential public supply of water suitable for drinking without treatment; baseflow for hydraulically-connected surface water bodies.

Classification: Ground water used or which may be used for public supplies of water suitable for drinking without treatment; ground water in the area that contributes to a public drinking water supply well; and ground water in areas that have been designated as a future water supply in an individual water utility supply plan or in the Area wide Supplement prepared by a Water Utility Coordinating Committee pursuant to Title 25 of the General Statutes.

D. *Inland Surface Waters Classification:*

Overland water runoff originating from the site would ultimately be expected to drain to the Housatonic River (the northernmost portion of the site would drain to the West Aspetuck River, which confluences with the Housatonic River). The portion of the Housatonic River to which site runoff would likely drain is designated a class "D/B" water body. This classification indicates surface water presently may not be meeting applicable Water Quality Criteria or not supporting one or more designated uses. The goal for such surface water is Class B. Class B designated uses (the next upgrade) include habitat for fish and other aquatic life and wildlife; recreation; navigation; and industrial and agricultural water supply.

E. *Coastal and Marine Surface Waters Classification:*

Not applicable.

5.0 SITE RECONNAISSANCE

CCA performed site reconnaissance on October 21, 2014. This visit included a visual inspection of the subject site buildings and exterior areas. CCA was accompanied by Mr. Michael Zarba, New Milford Public Works Director. Mr. Zarba provided general history and other direct knowledge of the subject site.

(See Appendix A for photographs of selected subject site features and a layout map of the six buildings and certain appurtenances for the 6 Young's Field Road portion of the subject site).

5.1 EXTERIOR CONDITIONS

A. *Evidence of Soil Contamination:*

Apparent surficial oil staining was observed at various outdoor vehicle storage areas on the 6 Young's field Road parcel, typical for the type of facility. Otherwise, no direct visible evidence of significant soil contamination was observed on the site at the time of the site walkover inspection. It is noted that the majority of the site soil is covered by buildings, concrete pavement, lawn grass and other vegetation and therefore could not be directly observed.

B. *Evidence of Surface Water Contamination:*

No evidence of surface water contamination was observed on the site at the time of the site walkover inspection.

C. *Odors:*

No unusual odors were noted on the site at the time of the site walkover inspection.

D. *Seeps or Leachate Outbreaks:*

Seeps or leachate outbreaks were not observed at the time of the site walkover inspection.

E. *Evidence of Soil Disturbance:*

Potential fill areas were observed on both the 6 and 20 Young's Field Road parcels. The 6 Young's field Road parcel presented an elevated drive/vehicle storage area to the rear (east) of Building Nos. 2 and 3, as evidenced by a steel I-beam being used as a retaining wall. A steep embankment on the southern portion of the 20 Young's Field Road parcel along Young's Field Road appeared to be comprised of fill per appearance in comparison to the general lay of the surrounding land. Otherwise, other than what can be attributed to grading and excavating associated with historical site

improvements (landscaping, installation of appurtenances, building foundation excavation, etc.), evidence of soil disturbance on the subject site was not observed.

F. Evidence of Oil or Chemical Waste Dumping/Spills:

Mr. Zarba indicated to CCA that a small pit located on the southern portion of the 20 Young's Field Road parcel is used for storm water catch basin sediment cleanout disposal. Exclusive of exterior road salt storage areas, no evidence of oil or chemical waste dumping/spills per se was observed on the site exterior at the time of the site walkover inspection.

G. Virgin Product or Hazardous Waste Storage:

A plastic calcium chloride (for Town road treatment during storm events) above-ground storage tank (AST) and filling station is located to the east of Building No. 1 on the 6 Young's Field Road parcel. A heating fuel oil AST is located to the rear of Building No. 3 on the 6 Young's Field Road parcel (other ASTs are indoors or in a shed). A small LPG tank cage is located at the south exterior wall of Building No. 4 on the 6 Young's Field Road parcel. An LPG tank is located at to the rear of the Facilities Maintenance building on the 20 Young's Field Road parcel. There is a waste oil and other household hazardous materials collection area at the recycling center on the 20 Young's Field Road parcel which is covered by a canopy. Road salt-sand mixture storage areas (stock piles) are located on both the 6 and 20 Young's Field Road parcels, with the storage area on the 6 Young's field Road parcel being relatively small. Treated road salt (unmixed) is also stockpiled on the 20 Young's Field Road parcel which is covered by a canopy. Emergency electrical generators, presumably powered with diesel fuel, are located on both the 6 and 20 Young's Field Road parcels (i.e. at the rear of Building No. 1 and at the rear of the Facilities Maintenance building, respectively).

H. Transformers and Capacitors:

No transformers or capacitors were observed on the site exterior during the site walkover inspection.

I. Monitoring Wells:

No monitoring wells were observed on the site exterior during the site walkover inspection.

J. Summary of Exterior Conditions:

Significant environmental Areas of Concern (AOCs) for the subject site as observed during the site walkover inspection would include the above-described fill areas (both parcels) and the pit that is being used to dispose of storm water catch basin cleanout sediment (20 Young's Field Road parcel). AOCs of a relatively minor nature would include observed surficial staining (the 6 Young's Field Road parcel), the fuel oil AST

(the 6 Young's Field Road parcel), the waste oil and other household hazardous material collection area (the 20 Young's field Road parcel), outdoor salt storage/stockpiling (primarily the 20 Young's Field Road parcel), and the emergency electrical generators (both parcels). The fill areas are AOCs due to the unknown source and quality of such fill. The storm water catch basin cleanout sediment pit is an AOC because such material frequently is impacted with gross petroleum hydrocarbons (PHCs), poly-aromatic hydrocarbons (PAHs), and heavy metals, primarily lead. Salt storage would be an AOC due to the potential to affect drinking water supplies, particularly at such times when stock piles are exposed to the elements. The observed oil staining is common for the type of facility and its significance is ultimately dependent upon vertical penetration and total horizontal extents, potential to affect groundwater that is being used as a water supply, and any change in site use (e.g. as in from commercial/industrial to residential or recreational). The remaining "minor" AOCs may be associated with accidental historic spillage or leakage of fuels or other hazardous materials.

5.2 **BUILDING INTERIOR CONDITIONS**

A. *Virgin Chemical Product or Hazardous Waste Storage:*

Heating fuel oil ASTs are located in Building No. 2 and in a shed attached to Building No 1. on the 6 Young's Field Road parcel. Flammables cabinets were observed inside the sign shop of Building No. 2 and the Bradin Building on the 6 Young's Field Road parcel, and were reported to contain paint products (sign shop) and small gasoline power tools and gasoline cans (Bradin Building). Building No. 5 on the 6 Young's Field Road parcel contains a waste oil AST, ASTs for virgin motor and hydraulic oil, other miscellaneous vehicle maintenance fluid bulk storage, and a parts cleaner that utilizes non-chlorinated solvent. Significant interior storage of virgin chemicals or hazardous waste was not observed on the 20 Young's Field Road parcel.

B. *Floor Drains:*

Only one floor drain was observed during the site walkover inspection. It is located inside the Bradin Building on the 6 Young's Field Road parcel of the subject site. It may be assumed that the outfall/discharge location for the floor drain is the municipal sanitary sewer system per the "Motor Vehicle Service Floor Drain Wastewater Approval and General Permit" on file at the New Milford Public Works department (see Section 8.5 and Appendix B), assuming that the document pertains to the observed floor drain (other floor drains may have been present but their view obstructed by site building storage conditions).

C. *Waste Handling and Disposal:*

A part of the northern portion of the 20 Young's Field Road parcel is the Town of New Milford recycling center, which is a transfer station (i.e. no on-site disposal, incineration, or land filling). The waste oil generated at the vehicle/equipment

maintenance building (Building No. 5 on the 6 Young's Field Road parcel) is disposed of off-site at a permitted facility. Otherwise, general non-hazardous solid waste and recyclables are presumably hauled off-site for disposal/transfer. Past handling and disposal practices of any hazardous materials or regulated wastes (e.g. waste oil) associated with equipment and vehicle maintenance is unknown.

D. Indicators of Contamination:

The concrete floors in all of the buildings on the 6 Young's Field Road parcel exhibit apparent oil staining to some extent, which is a common condition for the type of facility. The extent to which such staining may be indicative of negative impacts is variable and would depend on several factors such as the past associated use of solvents which would serve as penetrating agents through concrete floors to underlying soils and whether such staining historically remained confined to the interior areas.

E. Odors:

No unusual odors were noted inside the subject site buildings at the time of the site walkover inspection.

F. Asbestos Containing Materials:

This Phase I environmental site assessment (ESA) did not include a formal inventory of asbestos containing building materials (ACBMs) and is not intended for such use. It is noted that buildings constructed prior to the mid 1970's might contain ACMs. Therefore, ACMs may be present due to the apparent ages of the site buildings (as indicated in Section 7.0 of this report).

G. Lead Paint:

Testing for lead-based paint (LBP) was not performed as part of this ESA. It should be noted that buildings constructed prior to the mid-1970s might contain lead-based paint. Since the subject site buildings were constructed before the mid-1970s (as indicated in Section 7.0 of this report), lead based paint may be present. It is noted that degraded older paint on building exterior surfaces may be associated with lead-impacted surficial soil adjacent to and nearby such painted surfaces.

H. Transformers and Capacitors:

No transformers or capacitors were observed inside the site buildings during the walkover inspection.

I. Summary of Interior Conditions:

The current and apparent past use of the buildings on the 6 Young's Field Road parcel as a vehicle and equipment storage and maintenance facility is considered to be a significant environmental concern for the subject site. Specific AOCs would include

the floor drain discharge location, overhead doorways and other areas where hazardous materials and petroleum products are or have been stored and handled, and where inadvertent releases of polluting substances may have occurred.

Due to the age of the subject site buildings, LBP and ACMs may be present.

6.0 INTERVIEWS

6.1 *INTERVIEW WITH CURRENT PROPERTY OWNER*

The owner representative, Mr. Michael Zarba, New Milford Public Works Director was able to provide general history and other direct knowledge of the subject site. Mr. Zarba indicated to CCA that a vehicle fueling station with USTs was once located on the 6 Young's Field Road parcel just to the rear (east) of Building No. 5. This indication was confirmed by UST registration documents on-file at CTDEEP (see Section 8.5 and 8.6 for discussion).

6.2 *INTERVIEW WITH PAST OWNERS, OPERATORS, AND OCCUPANTS*

Past property owners, operators, or occupants were not interviewed for this ESA.

6.3 *INTERVIEW WITH GOVERNMENT AGENCIES*

Interviews with local government agency representatives were conducted as needed in conjunction with the review of regulatory records. Information obtained through these interviews is incorporated within the pertinent portions of this report.

7.1 SITE OWNERSHIP AND HISTORICAL USE

Determination of historical site ownership and use was based upon an examination of available records and reference materials (municipal street directories, Assessor's cards, land records (deeds), aerial photographs, and historical maps). Copies of the most recent title deeds and the most recent Assessor's field cards are presented in Appendix B. Historic survey maps and a portion of a historical atlas for the Town of New Milford (indicating historical ownership) are presented in Appendix A. The following summarizes the ascertained historical ownership and usage of the subject site:

6 Young's Field Road (Assessor's Map 28.4 Lot 10)

OWNER OF RECORD	DATES OF OWNERSHIP	ASCERTAINED SITE USE
New Milford, Town of	?* - Present	New Milford Public Works highway maintenance garage

* New Milford Land records Book and Page numbers for current and historical ownership deed(s) not indicated on Assessor's Card. Historical atlas map, however, indicates ownership by the Town of New Milford since at least November 1960 (see Appendix A for a copy of a portion of the Atlas map). Grantee indexes from 1960 to mid 1700s do not clearly indicate the appropriate parcel deed in the land records (i.e. the indexes/land records are not practically reviewable).

20 Young's Field Road (Assessor's Map 35.1 Lot 60)

OWNER OF RECORD	DATES OF OWNERSHIP	ASCERTAINED SITE USE
New Milford, Town of	August 2007 - Present	New Milford Facilities Maintenance headquarters and shop, truck wash, road salt and other road maintenance-related storage, recycling center/transfer station
New Milford, Town of	October 1957/July 1982 – August 2007	Same as above plus New Milford Ambulance headquarters
The Penn Central Corporation	?* – July 1982	Railroad yard with turntable and roundhouse
John M. & Bessie E. Hall	? – October 1957	Apparently Residential

* Historical survey map (see Appendix A) indicates ownership by railroads of portions of the parcel since at least 1941. Early grantee indexes/land records for parcel are not practically reviewable.

7.2 SANBORN MAPS, TOPOGRAPHIC MAPS, AND AERIAL PHOTOS REVIEW SUMMARY

Sanborn Maps, topographic maps, and aerial photographs reviewed at the CSL covering the subject site area are described below.

SANBORN MAPS

MAP YEAR	DESCRIPTION & COMMENTS
1931 Revised 1938	The southern portion of the 20 Young's Field Road parcel is depicted as containing railroad siding tracks (or spurs) with a turntable and a roundhouse (i.e. a building associated with the turntable and used for the storage and/or maintenance of train locomotives) (indicated as the New York, New Haven, & Hartford Rail Road). Otherwise, the subject site is not depicted on Sanborn maps for New Milford.
1931	No significant differences noted compared to the 1938 revision map.
1909	In addition to siding tracks, turntable, and roundhouse for railroad, there is a water tower depicted by the roundhouse. Additionally, the 8 Young's Field Road Parcel to the south of the 20 Young's Field Road parcel is depicted as containing an unspecified structure. Otherwise, no significant differences noted compared to the 1931 edition map.
1904	No significant differences noted compared to the 1909 revision map.
1897	The water tower depicted in the 1909 and 1904 edition maps is not present on map (siding, turntable, and roundhouse are present, however). Otherwise, no significant differences noted compared to the 1904 edition map.

TOPOGRAPHIC MAPS

MAP YEAR	DESCRIPTION & COMMENTS
1955 Photo-revised 1984	<p>The northern portion of the 6 Young's Field Road parcel (i.e. the portion of that parcel that is part of the subject site) is depicted as containing four buildings whereas currently there are six. The 8 Young's Field Road parcel, located between the 6 and 20 Young's Field Road parcels and occupied by Superior Plus Energy Services bulk fuel storage depot, depicted as containing four round ASTs, which is the current condition of that site. There is a railroad spur depicted on the map that leads directly to the 8 Young's field Road ASTs that would cross the 20 Young's field Road parcel if it were still present (it is not currently present). The Mitchell bulk fuel site, located to the southwest of the 20 Young's Field Road parcel across Young's Field Road is also depicted as containing four round ASTs. The northern portion of the 20 Young's Field Road parcel is depicted as containing a single building structure, which is apparently representative of the Facilities Maintenance building; no other structures depicted on the parcel. A road right-of-way that is not currently evident is depicted as traversing the northern portion of the 20 Young's Field Road parcel. Otherwise, mapped features such as roadways, water bodies, and surface topography appear similar to what is currently observed.</p>
1955 Photo-revised 1971	<p>No significant differences noted compared to the 1984 photo-revision map.</p>
1955	<p>The northern portion of the 6 Young's Field Road parcel is depicted as containing two buildings whereas later edition maps show four buildings. Roadways at and around the northern portion of the 20 Young's Field Road parcel configured differently than in later edition maps such that the right-of-way depicted on the later maps is in use. Single building depicted on the northern portion of the 20 Young's Field Road parcel is in a different location than on the later edition maps relative to the right-of-way and other features. Otherwise, no significant differences noted compared to the 1971 photo-revision map.</p>
1951	<p>Young's Field Road depicted as a dirt or gravel roadway. The northern portion of the 6 Young's Field Road parcel is depicted without any buildings (undeveloped). The Superior Plus Energy Services office/headquarters and liquid propane gas (LPG) storage yard site located to the southwest of the 20 Young's Field Road parcel across Young's Field Road depicted as undeveloped. Otherwise, no significant differences noted compared to the 1955 edition map.</p>
1889 Survey; 1904 Edition; 1947 Reprint	<p>There is no Young's Field Road depicted on the map. Both parcels of the subject site are depicted as undeveloped. The 8 Young's Field Road Parcel is also depicted as undeveloped (i.e. no ASTs or railroad spur). The Mitchell bulk fuel site, located to the southwest of the 20 Young's Field Road parcel across Young's Field Road is depicted as undeveloped. Except for the railroad and New Milford town center streets located to the east of the subject site, there is much less overall development in the general area of the subject site than in the later edition maps. Otherwise, no significant differences noted compared to the 1951 edition map.</p>

AERIAL PHOTOGRAPHS

PHOTO No. & DATE	DESCRIPTION & COMMENTS
79-57 4-13-2000	The canopy covering the treated road salt stock pile on the southern portion of the 20 Young's Field Road parcel (observed in the field) is not visible in the photograph. Otherwise, the subject site and immediate surrounding area appear similar to current observed conditions.
14-52 4-15-1996	There is an elongated building located along the northern border of the 6 Young's field Road parcel that was not observed in the field; the building corresponds with what is illustrated on the New Milford Assessor's Geographic Information Systems (GIS) parcel map (see copy in Appendix B). Otherwise, no significant differences noted for the subject site or surrounding area compared to the 2000 photograph.
14-2639 4-13-1990	Building No. 5 on the 6 Young's Field Road parcel is not present in the photograph. There appears to be a motor vehicle fueling station on the 6 Young's Field Road parcel, located to the east of where Building No. 5 is currently located (Note: CTDEEP UST records indicate tanks in this area no longer used after June 1989 – see Appendix C). The middle portion of the 20 Young's Field Road parcel appears undeveloped (currently it is used for outdoor storage) and the southern portion of the parcel appears to be used for stock piling of road salt and sand. Otherwise, no significant differences noted for the subject site or surrounding area compared to the 1996 photograph.
14-737 3-19-1985	The Town of New Milford fueling station that is located to the east of the 8 Young's Field Road parcel is not present as in later photographs (Note: CTDEEP UST records indicate these tanks were installed in June 1989 as replacements for the USTs on the 6 Young's Field Road parcel). The recycling center on the 20 Young's Field Road parcel is not present as in the later photographs; instead there appears to be road salt/sand storage in that area. There is no apparent road salt/sand storage on the southern portion of the 20 Young's Field Road parcel as in the later photographs. The Bradin Building on the 6 Young's Field Road parcel is not present in photograph as in later photographs. Otherwise, no significant differences noted for the subject site or surrounding area compared to the 1990 photograph.
14-5778 4-21-1980	The elongated building along the northern border of the 6 Young's Field Road parcel that is visible in the 1985-1996 photographs is not present in the photograph. There appears to be a house-sized building on the Superior Plus Energy Services office/headquarters site, located to the southwest of the 20 Young's Field Road parcel, instead of the building visible in the later photographs. Otherwise, no significant differences noted for the subject site or surrounding area compared to the 1985 photograph.
28-1119 3-28-1975	There is no truck wash building (reported former road salt storage barn) on the 20 Young's Field Road parcel as observed in the later photographs; the 20 Young's Field Road parcel appears undeveloped except for what is currently the New Milford Facilities Maintenance building on the northernmost portion of the parcel. Otherwise, no significant differences noted for the subject site or surrounding area compared to the 1980 photograph.
28-2911 3-9-1970	No significant differences noted for the subject site or surrounding area compared to the 1975 photograph.
23-3975 4-25-1965	Building No. 4 on the 6 Young's Field Road parcel not present as in the later photographs. The New Milford Facilities Maintenance building is not present in the photograph as in the later photographs; instead there is a road segment that transects that portion of the parcel that with corresponds to the right-of-way illustrated in most of the above-described historical topographic maps. Otherwise, no significant differences noted for the subject site or surrounding area compared to the 1970 photograph.

AERIAL PHOTOGRAPHS (Continued)

PHOTO No. & DATE	DESCRIPTION & COMMENTS
DPC-5H-88 10-20-1951	There is only one building (Building No. 1) on the 6 Young's Field Road parcel. It appears the above-described (1965 photograph) road segment that transects the northern portion of the 20 Young's Field Road parcel is fully incorporated as part of Young's Field Road instead of the current and historical (circa 1965 and after) configuration where heads strait away to the northwest. Young's Field Road appears unpaved. Otherwise, no significant differences noted for the subject site or surrounding area compared to the 1965 photograph.
8494 5839 X-X-1934	No buildings present on the 6 Young's Field Road parcel (undeveloped except for the ball field on the southern portion of the parcel). The Superior Plus Energy Services bulk fuel storage depot at the 8 Young's Field Road parcel not present as in later photographs. Young's Field Road as it currently and historically (circa 1951 and after) exists not present; instead it is a road segment that comes in from the north, crossed the northern portion of the 20 Young's Field Road parcel, and terminates at the Mitchell bulk fuel storage depot located to the southwest of the 20 Young's Field Road parcel. The southern portion of the 20 Young's Field Road parcel appears to contain railroad spurs, a railroad turntable, and a railroad roundhouse (i.e. a building associated with the turntable and used for the storage and/or maintenance of train locomotives) that corresponds with what is illustrated on the Sanborn Maps.

7.3 HISTORICAL WASTE HANDLING/DISPOSAL

The EDR database search report indicates that 450 gallons of hazardous waste was shipped from the 6 Young's Field Road parcel on July 1, 1991. The hazardous waste is classified as "flammable" (D001) and has "UNNA" code 1993 for diesel fuel or fuel oil. It appears possible that this one-time shipment is related to terminating the use of a diesel fuel UST on the parcel in June 1989, with a two year lapse between terminating the use of the UST and removing the product prior to UST removal. In addition to the EDR database listing, hazardous waste manifests for the disposal of liquid residuals associated with LUSTs were on file at the New Milford Public Works department (see Section 8.5).

A portion of the northern end of the 20 Young's Field Road is the Town of New Milford recycling center, which is a transfer station (ultimate disposal is not completed at the site). The recycling center has been in operation since circa the mid-1980s per historic street directories and operations includes the collection for off-site disposal of waste oil and "household hazardous waste".

An anonymous complaint was made to the CTDEEP Waste Engineering and Enforcement Division in December 1993 regarding the delivery of waste drums to the recycling center by the Town highway maintenance crew. The complaint prompted an inspection of the recycling center and the Town Highway Garage, completed shortly after the complaint, in December 1993, and another follow-up inspection in April 1994. A number of irregularities were identified such as the failure to properly label waste containers, failure to maintain disposal records (i.e. manifests), and failure to use secondary containment and the storage of containers with liquid wastes on pervious materials (soil, gravel). The Highway Garage apparently consumed much of its generated waste oil in the form of heating (waste oil furnaces). The latest document in the file regarding the complaint is a letter dated January 30, 1995 from the CTDEEP to the New Milford recycling center inquiring about progress correcting the irregularities identified during the inspections. See Appendix C for copies of the documents associated with the complaint.

Otherwise, no specific information regarding historical waste handling and disposal was identified for the subject site during this assessment.

7.4 HISTORICAL UTILITIES USAGE

The 6 Young's Field Road parcel is currently serviced by the municipal sanitary sewer system and utilizes an on-site water supply well. The date of sanitary sewer connection was not determined.

Various information sources, indicating suspect or confirmed LUST(s), have indicated the historic use of one or more fuel oil USTs on the 6 Young's Field Road parcel. See Sections 8.4, 8.5, and 8.6 for further information.

The 20 Young's Field Road parcel is currently serviced by the municipal sanitary sewer system and the local public water supply company. The sewer was connected to the

Facilities Maintenance building in 1972. Operation of the truck wash on the 20 Young's Field Road parcel was initiated circa February 2013 when the building was converted to its current use after being used for road salt storage.

7.5 OBSERVATIONS RELATED TO HISTORICAL SITE USE

The northern portion of the 6 Young's Field Road parcel appears to have been used by the Town of New Milford Public Works highway maintenance garage and headquarters since at least circa the early 1950s. This is based upon observations in historical photos which show a building on the site in 1951 but not 1934. The southern portion of the 6 Young's Field Road parcel was being used for recreational purposes (i.e. as a ball field), as it is currently, per the 1934 photograph.

The southern portion of the 20 Young's Field Road parcel subject site has apparently been used for the storage of road salt stock piles and other miscellaneous storage since circa 1990. This portion of the site appears to have been undeveloped from circa 1951 through 1990. Early twentieth century use of this portion of the subject site, when it was owned by one or more rail road entities, was as a spur yard, turntable, and roundhouse.

The recycling center on the northern portion of the 20 Young's Field Road parcel appears to have been in operation since circa the mid to late 1980s. Previous to that use of that portion of the site, it appears to have been used for salt storage since circa 1975.

The northern-most portion of the 20 Young's Field Road parcel, currently occupied by New Milford Facilities Maintenance headquarters and shop, appears to have been previously occupied by New Milford Ambulance from circa 1985 to some time in the 1990s or 2000s. Previous to occupation by New Milford Ambulance, the northern portion of the parcel appears to have used as a residence.

8.0 RECORDS REVIEWED

8.1 PREVIOUS ENVIRONMENTAL REPORTS

Environmental reports and other certain environmental-related information for the subject site were provided to CCA by the subject site owner, the Town of New Milford, via various municipal services departments (Public Works, Health, and Fire Marshall). These reports/information are discussed in section 8.5 and 8.6 of this report.

8.2 COMPUTER DATABASE SEARCH

The EDR Inc. database search of "Standard Environmental Records" included at a minimum the following data:

- list of Federal National Priority List (NPL) sites, including proposed sites, and Delisted NPL sites within 1.0 mile and 0.5 mile, respectively, of the target site (and any NPL Liens for the target site only);
- list of Federal Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS) sites and CERCLIS sites for which no further remedial action is planned (NFRAP) within 0.5 mile of the target site;
- list of Federal Resource Conservation and Recovery Act (RCRA) Corrective Action (CORRACTS) facilities within 1.0 mile of the target site;
- list of Federal RCRA non-CORRACTS Treatment, Storage, and Disposal (TSD) facilities within 0.5 mile of the target site;
- list of Federal RCRA generators (large quantity (LQG), small quantity (SQG), and conditionally exempt small quantity (CESQG) hazardous waste generators) within 0.25 mile of the target site;
- list of Federal Institutional Controls/Engineering Controls (IC/EC) sites within 0.5 mile of the target site;
- list of Federal Emergency Response Notification System (ERNS) sites within 0.25 mile of the target site;
- list of State/Tribal equivalent CERCLIS sites – i.e. State Hazardous Waste Sites (SHWS) and Site Discovery and Assessment Database (SDADB) sites within 1.0 mile of the target site;
- list of State/Tribal Landfill and/or Solid Waste Disposal sites (SWL/LF) within 0.5 mile of the target site;

- list of State/Tribal leaking underground storage tanks (LUSTs) within 0.5 mile of the target site;
- list of State/Tribal registered underground and above-ground storage tanks (USTs and ASTs) within 0.25 mile of the target site;
- list of State/Tribal IC/EC sites within 0.5 mile of the target site;
- list of State/Tribal Voluntary Cleanup Program (VCP) sites within 0.5 mile of the target site; and
- list of State/Tribal “Brownfield” sites within 0.5 mile of the target site.

The EDR Inc. database search of “Additional Environmental Records” included at a minimum the following data:

- list of local “Brownfield” (US Brownfields) sites within 0.5 mile of the target site;
- lists of local SWL/LF sites within 0.5 mile of the target site;
- lists of local Hazardous Waste/Contaminated sites (for the target site only);
- lists of local Land Records (i.e. environmental liens and Connecticut PTP) sites within 0.25 mile of the target site;
- lists of Emergency Release Records - i.e. Federal (Department of Transportation) Hazardous Materials Information Reporting System (HMIRS) and CTDEEP Oil and Chemical Spills Database (SPILLS) for the target site and within 0.25 mile of the target site, respectively; and
- lists of Other Ascertainable Records sites (numerous additional databases provided by State and Federal agencies as adjuncts to the above-listed standard and additional primary database search listings – see Appendix D, EDR Inc. database search report for details (Government Records Searched/Data Currency Tracking for descriptions and sources)), within various radii of the subject site.

The EDR Inc. database search of “EDR High Risk Historical Records” included the following data:

- list of EDR Proprietary Manufactured Gas Plants (MGP) within 0.5 mile of the target site;
- list of EDR Exclusive Historic Gas Stations (US Hist Auto Stat) within 0.5 mile of the target site; and

- list of EDR Exclusive & Proprietary Historic Dry Cleaners (US Hist Cleaners) within 0.5 mile of the target site.

The EDR Inc. database search of “EDR Recovered Government Archives” included the following data:

- list of Connecticut Recovered Government Archive State Hazardous Waste Facilities sites (CT RGA HWS) and CT RGA LUST sites for within 1.0 mile and 0.5 mile, respectively of the target site.

A presentation of the EDR Inc. summary report, with maps and database descriptions and sources, and selected notable site detail reports is included as Appendix D.

8.3 CTDEEP RECORDS DATABASE/FILE REVIEW

In addition to the on-line computer database search, CCA reviewed CTDEEP standard environmental record sources (inventory lists, logbooks, etc.) and miscellaneous correspondence/city files, historic OCS reports (i.e. prior to January 1, 1991) and the Bureau of Waste Management (now known as the Bureau of Material Management and Compliance Assurance) and Bureau of Water Management (now known as the Bureau of Water Protection and Land Re-use) individual file listings to determine whether the subject site or surrounding sites had generated activity or were the subject of incidences concerning CTDEEP enforcement, response or permitting. Copies of selected file contents reviewed at the CTDEEP for sites/incidences in the vicinity of the subject site are presented in Appendix C.

8.4 SUMMARY OF COMPUTER DATABASE AND CTDEEP STANDARD ENVIRONMENTAL RECORDS SOURCES REVIEW FOR THE SUBJECT SITE AND SURROUNDING VICINITY

(Note: Computer database inventory details and currency (update) information is presented in the EDR Inc. report, presented in Appendix D.

A. Federal NPL and Delisted NPL sites:

Site: Not listed.

Within 1-mile (NPL) and ½-mile (Delisted NPL) Radius: None.

B. Federal CERCLIS and NFRAP CERCLIS sites:

Site: Not listed.

Within ½-mile Radius: None.

C. Federal RCRA CORRACTS sites:

Site: Not listed.

Within 1-mile Radius:

Century Brass Products, 12 Scovill Street, New Milford CT

D. Federal RCRA TSD sites:

Site: Not listed.

Within ½-mile Radius: None.

E. Federal RCRA Generator sites:

Site: Not Listed.

Within ¼-mile Radius:

Tommy's Cleaners, 78 Railroad Street, New Milford CT

F. List of Federal IC/EC sites:

Site: Not listed.

Within ½-mile Radius: None.

G. Federal ERNS sites:

Site: Not listed.

Within ¼-mile Radius: None.

H. State/Tribal equivalent CERCLIS sites (SHWS and SDADB):

Site: Not listed.

Within 1-mile Radius:

Century Brass Products, Inc., Aspetuck Avenue, New Milford CT
Watkins Brothers Machinery Corp., 19 Wells Road, New Milford CT
Tommy's Cleaners, 78 Railroad Street, New Milford CT
Village Green Cleaners, 47 Main Street, New Milford CT
SNET, 44 Bridge Street, New Milford CT
Mobil Oil Corp. Service Station, 59 Bridge Street, New Milford CT
Diventco Inc., 30 West Street, New Milford CT
Baldor Boehm Co., 285A Wellsville Avenue, New Milford CT
Smoke and Mirrors, LLC, 30 Kent Road, New Milford CT
S. Brien Property, 44 South Kent Road, New Milford CT
Kinsella Auto, Ltd., 12-14 Bridge Street, New Milford CT
A-1 Auto Body Works of New Milford, Bridge Street, New Milford CT
Mobil # Home-3, 10 Spring Street, New Milford CT
Food Ingredients Specialties, 201 Housatonic Avenue, New Milford CT
Walter G. Southworth Inc., 5 Danbury Road, New Milford CT
Robert Auto Sales and Service, 16 Danbury Road, New Milford CT

I. *State/Tribal SWL/LF sites:*

Site: Not listed.

Within ½-mile Radius: None.

J. *State/Tribal LUST sites:*

Site:

Listed as Town of New Milford Hwy. Gar., 6 Young's Field Road, New Milford CT

Within ½-mile radius:

Atchinson, 19 Terrace Place, New Milford CT
Lynn Buffington, 15 Terrace Place, New Milford CT
Robert Witamore, 16 Aspetuck Avenue, New Milford CT
Taylor House, Main Street, New Milford CT
Homestead Inn- Rolf Hammer, 5 Elm Street, New Milford CT
Eb Leili, 51-67 Bank Street, New Milford CT
Gene and Joann Calarco, 1 Marwick Manor, New Milford CT
Cuddy's Service Station, 45 Bridge Street, New Milford CT
Bridge Street Mobil, 59 Bridge Street, New Milford CT
Daryll Ann Carter, 44 East Street, New Milford CT
Canterbury School, 77 Marwick Manor, New Milford CT
Layton Property, 26 West Street, New Milford CT
Edward Baylock, 127 Housatonic Avenue, New Milford CT
Sand & Gravel Yard, Fort Hill Road, New Milford CT
CTDOT Maintenance Garage, 43 Kent Road, New Milford CT
Big Y, 56 Kent Road, New Milford CT
Lindstedt Oil Co., 7 Young's Field Road, New Milford CT
United Water Company Well Field, Fort Hill Road, New Milford CT
Former Home Oil Terminal No. 0, 10 Bridge Street, New Milford CT
Veteran's Plaza, 1 Kent Road, New Milford CT
Auto Technic, LLC, 6 Danbury Road, New Milford CT
Southworth's, 5 Danbury Road, New Milford CT

K. *State/Tribal Registered UST and AST sites:*

Site:

Listed as Hwy. Gar./Town of New Milford, 6 Young's Field Road, New Milford CT

Within ¼-mile radius:

Peter Stone, 119 Housatonic Avenue, New Milford CT
H.H. Taylor & Son, Inc., 85 Railroad Street, New Milford CT

Agway, Inc. New Milford Store, 126 Housatonic Avenue, New Milford CT

L. State/Tribal IC/EC sites:

Site: Not listed.

Within ½-mile Radius: None.

M. State/Tribal VCP sites:

Site: Not listed.

Within ½-mile Radius:

Century Enterprise Center, 12 Aspetuck Road, New Milford CT
Bridge Street Mobil, 59 Bridge Street, New Milford CT
12-14 Bridge Street, New Milford CT

N. State/Tribal Brownfield sites:

Site: Not listed.

Within ½-mile Radius: None.

O. US Brownfield sites:

Site: Not listed.

Within ½-mile Radius:

Century Enterprise Center, 10 Main Street, New Milford CT
29 Church Street, New Milford CT

P. Local SWL/LF sites:

Site: Not listed.

Within ½-mile Radius:

New Milford Transfer Station, 18 Young's Field Road, New Milford CT

Q. Local Hazardous Waste/Contaminated sites:

Site only: Not listed.

Within ¼-mile radius: None.

R. Local Land Records sites:

Site only: Not listed.

Within ¼-mile radius:

Tommy's Cleaners, 78 Railroad Street, New Milford CT

S. *Emergency Release Records (HMIRS and SPILLS) sites:*

Site only:

Listed as Town of New Milford Hwy. Gar., 6 Young's Field Road, New Milford CT

Within 1/4-mile radius:

Young's Field Road, New Milford CT
20 Housatonic Avenue, New Milford CT
5-C Bennett Street, New Milford CT
14 Taylor Street, New Milford CT
110 Housatonic Avenue, New Milford CT
94 Rail Road Street, New Milford CT
Atchinson, 19 Terrace Place, New Milford CT
Lynn Buffington, 15 Terrace Place, New Milford CT
6 Terrace Place, New Milford CT
126 Housatonic Avenue, New Milford CT
27 Terrace Place Ext., New Milford CT
75 Wellsville Avenue, New Milford CT
21 Paylor Street New Milford CT
Culvert City Road, New Milford CT
1 Aspetuck Avenue, New Milford CT
7 Young's Field Road, New Milford CT
Young's Field Road Recycling, New Milford CT
Housatonic Avenue & Young's Field Road, New Milford CT
Edward Baylock, 127 Housatonic Avenue, New Milford CT

T. *Other Ascertainable Records sites:*

Site:

United States Environmental Protection Agency (USEPA) RCRA Non-Generators/No Longer regulated sites (RCRA NonGen/NLR)

Listed as New Milford Public Works, 6 Young's Field Road, New Milford CT

Facility Index System/Facility Registry System sites (FINDS)

Listed as New Milford Public Works & Highway Garage/Town of New Milford, 6 Young's Field Road, New Milford CT

Connecticut Leachate & Wastewater Discharge Sites (LWDS) Within 1-mile Radius

New Milford Town Salt Storage, New Milford CT

Hazardous Waste Manifest database sites (MANIFEST)

Listed as New Milford Public Works, 6 Young's Field Road, New Milford CT

Connecticut Enforcement Case Listing (CT ENF)

Listed as New Milford Public Works, 6 Young's Field Road, New Milford CT

Contaminated or Potentially Contaminated Sites (CPCS)

Listed as Town of New Milford Highway Garage, 6 Young's Field Road, New Milford CT

Within Various Radii:

United States Environmental Protection Agency (USEPA) RCRA Non-Generators/No Longer regulated sites (RCRA NonGen/NLR) Within ¼-mile Radius

H.H. Taylor & Son, Inc., 85 Railroad Street, New Milford CT

Housatonic Valley Publishing Co., 11 Boardman Terrace, New Milford CT

Mines Master Index File (US MINES) Within ½-mile Radius

Town of New Milford, New Milford CT

Historical Federal Insecticide, Fungicide & Rodenticide Act (FIFRA)/Toxic Substances Control Act (TSCA) Tracking System Administrative Case Listing (HIST FTTS) Within ½-mile Radius

New Milford Hospital, 29 Elm Street, New Milford CT

Town of New Milford, New Milford CT

Facility Index System/Facility Registry System sites (FINDS) Within ¼-mile Radius

Housatonic Avenue, New Milford CT

Sega Meadows Park Pond, Housatonic Avenue, New Milford CT

Peter Stone, 119 Housatonic Avenue, New Milford CT

Hansen & Tiers, 119 Housatonic Avenue, New Milford CT

Tommy's Cleaners, 78 Railroad Street, New Milford CT

H.H. Taylor & Son, Inc., 85 Railroad Street, New Milford CT

Housatonic Valley Publishing Co., 11 Boardman Terrace, New Milford CT

Agway, Inc. New Milford Store, 126 Housatonic Avenue, New Milford CT

Connecticut Leachate & Wastewater Discharge Sites (LWDS) Within 1-mile Radius

Diventco Corp., 30 West Street, New Milford CT

Candlewood Animal Hospital, 117 Kent Road, New Milford CT

Century Brass, Aspetuck Road, New Milford CT

Watkins Brothers Machinery Corp., 19 Wells Road, New Milford CT

State of Connecticut, Route 7 & Fort Hill Road, New Milford CT

Connecticut Department of Transportation, Route 25 & Bridge Street, New Milford CT

Texaco, New Milford CT

New Milford Town Sewage Treatment Plant, New Milford CT

Hazardous Waste Manifest database sites (MANIFEST) Within ¼-mile Radius

Danbury Chemical Products Co., 1 Wellsville Avenue, New Milford CT

State of Connecticut Dept. of Transportation, 78 Railroad Street, New Milford CT

Tommy's Cleaners, 78 Railroad Street, New Milford CT

Housatonic Valley Publishing Co., 11 Boardman Terrace, New Milford CT

List of Significant Environmental Hazards Reported to CTDEEP (CT SEH)
Within ½-mile Radius

Westreco, Inc., 201 Housatonic Avenue, New Milford CT

Contaminated or Potentially Contaminated Sites (CPCS) Within ½-mile Radius

Atchinson, 19 Terrace Place, New Milford CT
Lynn Buffington, 15 Terrace Place, New Milford CT
Robert Witamore, 16 Aspetuck Avenue, New Milford CT
Gene Marino, 13 Aspetuck Avenue, New Milford CT
Village Green Cleaners, 47 Main Street, New Milford CT
Canterbury School, Aspetuck Avenue, New Milford CT
Taylor House, Main Street, New Milford CT
Homestead Inn – Rolf Hammer, 5 Elm Street, New Milford CT
Eb Leili, 51-67 Bank Street, New Milford CT
Lindstedt Oil Co., Young’s Field Road, New Milford CT
Bridge Street Mobil, 59 Bridge Street, New Milford CT
Daryll Ann Carter, 44 East Street, New Milford CT
Canterbury School, 77 Marwick Manor, New Milford CT
Edward Baylock, 127 Housatonic Avenue, New Milford CT
Sand & Gravel Yard, Fort Hill Road, New Milford CT
Big Y, 56 Kent Road, New Milford CT
United Water Company Well Field, Fort Hill Road, New Milford CT
Home Fuel Oil Terminal, Spring & Bridge Streets, New Milford CT
Veteran’s Plaza, 1 Kent Road, New Milford CT
FIS-North America, Inc., 201 Housatonic Avenue, New Milford CT
Auto Technic, LLC, 6 Danbury Road, New Milford CT
Walter G. Southworth, Inc., 5 Danbury Road, New Milford CT

Federal 2020 Corrective Action Program List sites (2020 COR ACTION)
Within 1-mile Radius

Century Brass Products, 12 Scovill Street, New Milford CT

U. *EDR Proprietary MGP sites:*

Site: Not listed.
Within ½-mile Radius: None.

V. *EDR Exclusive US Hist Auto Stat sites:*

Site: Not listed.
Within ½-mile Radius:

82 Railroad Street, New Milford CT
26 Bridge Street, New Milford CT
45 Bridge Street, New Milford CT

7 Young's Field Road, New Milford CT
12 Bridge Street, New Milford CT
6 Danbury Road, New Milford CT

W. EDR Exclusive & Proprietary US Hist Cleaners sites:

Site: Not listed.

Within 1/2-mile Radius:

78 Railroad Street, New Milford CT
47 Main Street, New Milford CT
38 Bridge Street, New Milford CT
1 Church Street, New Milford CT

X. EDR Exclusive CT RGA HWS & LUST sites:

Site only:

Listed as Town of New Milford Hwy. Gar., 6 Young's Field Road, New Milford CT

Within 1-mile Radius (HWS) and 1/2-mile (LUST) Radius:

Watkins Brothers Machinery, 19 Wells Road, New Milford CT
Atchinson, 19 Terrace Place, New Milford CT
Lynn Buffington, 15 Terrace Place, New Milford CT
6 Terrace Place, New Milford CT
Gene Marino, 13 Aspetuck Avenue, New Milford CT
Diane Miller-Osborne 14 Aspetuck Avenue, New Milford CT
46 Main Street, New Milford CT
Homestead Inn- Rolf Hammer, 5 Elm Street, New Milford CT
Eb Leili, 51-67 Bank Street, New Milford CT
Cuddy Property, 45 Bridge Street, New Milford CT
Bridge Street Mobil, 57 & 59 Bridge Street, New Milford CT
31 Marwick Manor, New Milford CT
96 Aspetuck Avenue, New Milford CT
Daryll Ann Carter, 44 East Street, New Milford CT
Canterbury School, 77 Marwick Manor, New Milford CT
Layton Property, 26 West Street, New Milford CT
Edward Baylock, 127 Housatonic Avenue, New Milford CT
CTDOT Maintenance Garage, 43 Kent Road, New Milford CT
Big Y, 56 Kent Road, New Milford CT
Veteran's Plaza, 1 Kent Road, New Milford CT
201 Housatonic Avenue, New Milford CT
Texaco Service Station, 6 Danbury Road, New Milford CT
Southworth Chrysler, 5 Danbury Road, New Milford CT

Y. Non-Geo-coded (orphan) sites (all database listings as indicated):

The EDR Inc. report contains a list of sites that have not been mapped (geo-coded) for ready location reference due to insufficient information. These site database listings were reviewed to determine whether the subject site or nearby sites with indication for significant potential to affect the subject site are inventoried as such non-geo-coded sites. None of the listed non-geo-coded sites appeared to be either the subject site, or a site at a location or indicative of a condition expected to present a material threat of potential significant offsite source impacts to the subject site (as qualified by the limited information).

Z. *"Leachate and Wastewater Discharges" Inventory Map, Housatonic River, Hudson River and Southwest Coastal Basins (Revised 1997):*

Site:

Town of New Milford – Active Salt Storage

Within 1/2-mile Radius:

State of Connecticut DOT – Active Salt Storage

New Milford - Active Water Treatment Discharge

Texaco – Inactive Gasoline Spill

Diventco – Active Metal Finishing Discharge

AA. *Public Water Supply(s) within 1/2-mile Radius of Site (from the "Atlas of the Public Water Supply Sources and Drainage Basins of Connecticut," dated June 1982:*

Site: Not listed.

Within 1/2-mile radius:

New Milford Water Company Fort Hill Road Wells

BB. *Aquifer Protection Area:*

The subject property *does* lie within a State of Connecticut stratified drift aquifer protection area (Connecticut Aquifer Protection Areas Map, 2001). The subject site also partially lies within a Town of New Milford Level A Aquifer Protection Area (i.e. northernmost portion of site).

CC. *Site Well Records Reviewed:*

A well head was observed on the northern portion of the 6 Young's Field Road parcel that appeared to be a relatively recent installation, but there were no drilling permits or well logs on file at the New Milford Health Department. Several laboratory reports for well water samples from the 6 Young's Field Road parcel were on file, however. The reports were for samples collected January 1979 through December 1994 and were generated by the Connecticut State Department of Health Services laboratory (earlier

reports) or by the HydroTechnologies Inc. of New Milford laboratory (later reports). Several of the earlier Connecticut State Department of Health Services laboratory reports indicate that the well is 160 feet deep. Test parameters include those for general potability characteristics (i.e. coliform bacteria, pH, color, odor, sulfate, nitrate, etc.) as well as for impacts by polluting substances. Pollution indicator parameters included volatile organic compounds (VOCs), "hydrocarbons" (unspecified), "organohalides" (limited VOCs), methyl tertiary butyl ether (MTBE), and pesticides. The one test for MTBE exhibited a concentration of 0.9 ug/l, a very low concentration; otherwise, polluting substances (VOCs, etc.) were not detected. In one instance (sample date June 11, 1984) the water supply well exhibited the presence of coliform bacteria, but this was not repeated for later sample collection dates. Copies of the laboratory reports are included in Appendix B.

In addition to the laboratory reports on-file at the New Milford Health Department, CCA obtained more contemporary water supply well water quality data for the 6 Young's Field Road parcel from the HydroTechnologies Inc. laboratory. HydroTechnologies Inc. collects and analyzes samples from the water supply well on a regular frequency in accordance with Connecticut State Health Department regulations. Analyses results reports provided were for samples collected from December 2013 through September 2014. Test parameters include those for general potability characteristics (i.e. coliform bacteria, pH, color, odor, turbidity, etc.) as well as for impacts by polluting substances. Pollution indicator parameters included VOCs and pesticides. All potability test parameter results were within State Health Department guidelines, and neither VOCs nor pesticides were detected. Copies of the laboratory reports are included in Appendix B.

DD. CTDEEP Property Transfer Program Status (site only):

The EDR database report contained two indications of possible qualification of the 6 Young's Field Road parcel as a hazardous waste "establishment" under the Property Transfer Law of Connecticut (Connecticut General Statutes (CGS) Sections 22a-134 through 22a-134e). The first was the documented manifested waste shipment of 450 gallons of flammable (D001) waste on July 1, 1991, and may have been related to the terminating the use of a diesel fuel UST on the parcel (see Section 7.3). The second was the listing in the USEPA RCRA NonGen/NLR database, which indicates that the site may have been a generator of hazardous waste in the past but is "no longer regulated" (note: there was no RCRA (hazardous waste) file for the 6 Young's Field Road parcel at the CTDEEP). In addition to the EDR database listing, hazardous waste manifests for the disposal of liquid residuals associated with LUSTs were on file at the New Milford Public Works department (see Section 8.5). Otherwise, there was no indication per site observations and information reviewed for the ESA described herein that the 6 Young's Field Road parcel meets the definition of a hazardous waste "establishment" under CGS Sections 22a-134 through 22a-134e.

Qualified counsel experienced with the Property Transfer Law should be consulted to determine the "establishment" status of the 6 Young's Field Road parcel. Hazardous waste "establishments" are required to enter the CTDEEP Property Transfer Program

(PTP) upon certain ownership changes (e.g. sale between unrelated parties). The PTP is a CTDEEP formal remediation program and as such, transferred hazardous waste "establishments" are subject to investigation and remediation if indicated by investigation of site environmental media in accordance with the prevailing guidelines (prescribed by CTDEEP) and to eventual compliance with the Connecticut Remediation Standards Regulations (the RSRs – Regulations of Connecticut State Agencies (RCSA) Sections 22a-133k-1 through 22a-133k-3).

With the possible exception of the presence of the recycling center, due to the collection for off-site disposal of "household hazardous waste", there were no observations or information reviewed for the ESA described herein indicating that the 20 Young's Field Road parcel would be considered a hazardous waste "establishment" under the Property Transfer Law.

8.5 SUMMARY OF CTDEEP, LOCAL, & SITE DOCUMENTS REVIEWED

Copies of the following items (documents) are enclosed in Appendix B (Local Records):

An application to remove a 550-gallon heating fuel oil UST from behind Building No. 1 of the 6 Young's Field Road parcel dated September 8, 2003, on file at the New Milford Fire Marshalls office. With the application is a laboratory report indicating soils that are impacted with petroleum hydrocarbons at a concentration of 1,050 mg/kg, and a certification that the UST had been removed and disposed of as scrap metal. The reported concentration of 1,050 mg/kg is below the Connecticut clean-up standards for an industrial commercial use site with regard to Direct Exposure Criteria (CEC) and a "GB" groundwater classification area with regard to the Pollutant Mobility Criteria (PMC), both applicable to the 6 Young's Field Road parcel.

A CTDEEP Emergency Response and Spill Prevention Division (ERSPD) Emergency Incident Report, on file at the New Milford Fire Marshall's office, for the above-described LUST. The report indicates that the status of the incident is "open".

The New Milford Public Works department provided additional information with regard to the above-described 550-gallon LUST documentation and associated emergency incident report, including an apparent updated incident report, soil and water quality data (sample analyses reports from HydroTechnologies Inc.), photographs, and disposal manifests for residual liquid and contaminated soil. The updated emergency incident report indicates that the case is closed. The exact context of the soil and groundwater quality data is not clear (i.e. it is not indicated at what point and for what purpose during the emergency incident response the samples were collected), but it does confirm there was a release associated with the UST. The photographs show the installation of a passive soil venting system following the remedial excavation of contaminated soil associated with the UST. The disposal manifests indicate that 450 gallons of Connecticut CR02 regulated waste (oil or petroleum no longer suitable for service - presumed to be residuals from the UST) was removed from the site and disposed of at Bridgeport United Recycling, and that

272 tons of petroleum-contaminated soil was removed from the site and disposed of at Phoenix Soil, LLC of Waterbury Connecticut. Mr. Alan Russo of the Town of New Milford Public Works department informed CCA that the passive soil venting system was installed (to facilitate attenuation of remaining impacted soil) since it was determined that all of the impacted soil associated with the UST had been removed but that otherwise apparent petroleum-contaminated soil that was not attributed to the LUST was present at the limits of the remedial excavation.

A memorandum from the Town of New Milford Fire Marshall to Public Works, dated January 10, 2000, with attached complaint form and phone message, regarding the response to an anonymous complaint of gasoline cans being stored on the floor of Building No. 3 on the 6 Young's Field Road parcel. The response, an inspection by the Fire Marshall, concluded that the condition did not present a current hazard but that storage cabinets would be obtained and "no smoking" signs would be posted.

Selected portions of a letter report regarding the removal of a 500-gallon fuel oil UST associated with Building No. 4 on the 6 Young's Field Road parcel, on file at the New Milford Public Works department. The letter report indicates, as stated, the removal of one UST but contains a tank disposal certification for two USTs (one 500-gallon and one 1,000-gallon). There is no explanation for the discrepancy in the letter report or other attached documents, which include a composite soil sample analyses laboratory report, a UST location diagram, and photographs. The soil sample analyses report indicates PHCs were present in the UST grave soils at a concentration of 95.6 parts per million (PPM), which is below applicable Connecticut State clean-up standards (i.e. the RSRs numerical criteria). It is noted that composite sampling is representative of the average of several data collection points, and is not generally considered the preferred Standard of Care for representative environmental media quality data collection in Connecticut.

A "memo to file" dated January 30, 1997, on file at the New Milford Fire Marshall's office regarding the discovery of a septic tank and a dry well exhibiting a strong oily odor and a nearby apparently abandoned 550-gallon fuel oil UST on the 6 Young's Field Road parcel. The memo indicates that the septic tank was removed and contaminated soil was stockpiled for later removal. Attached with the memo are a letter to CTDEEP "Hazardous Waste Manifest Program" and a manifest indicating the disposal of either the fuel oil or septic tank contents (it is not exactly clear from the documentation if it was the oil tank or the septic tank that was pumped out and removed). The letter also indicates the intention to remediate impacted soil but there was no documentation on file at the Fire Marshall's office indicating that the remediation had been completed.

The New Milford Public Works department provided additional information with regard to the above-described discovery incident. Included are hand notations, a hazardous waste manifest for the disposal of 438 gallons of "waste gasoline solution", a tank removal permit application, a location diagram, disposal manifests for contaminated soil, soil quality data (sample analyses reports from HydroTechnologies Inc.), and a letter to the New Milford Board of Finance from the

Director of Public Works regarding the emergency remediation of contaminated soil and underground storage devices at Public Works. The hazardous waste manifest (dated January 13, 1996) appears to pertain to something other than the discovery incident based upon dates on the document and other documents. The location diagram indicates the location of the fuel oil UST, which is at the northeast corner of Building No. 2 on the 6 Young's Field Road parcel. The soil disposal documents indicate that eight truck loads of petroleum-contaminated soil was removed from the site and disposed of at Phoenix Soil, LLC of Waterbury Connecticut (tonnage could not be ascertained due to copy quality). The soil quality data indicates that the contaminated soil was sufficiently remediated (based upon the results they appear to be post remedial excavation samples). The letter to the Board of Finance is a request to waive formal bid requirements of the Town.

A CTDEEP "Motor Vehicle Service Floor Drain Wastewater Approval and General Permit" for the 6 Young's Field Road parcel, dated July 9, 1991, on file at the New Milford Public Works department. There was no indication as for which building the floor drain permit is issued, but there was only one floor drain observed during the site walkover inspection (see Section 5.5). The document indicates, among other conditions, that the floor drain effluent is to be treated by an oil separator before being discharged to the municipal sanitary sewer,

Two waste characterization certifications ("Land Disposal Restriction Notification/Certification for United Oil Recovery, Inc.") and corresponding hazardous waste manifests reportedly pertaining to the disposal of residuals from two reported former motor fuel USTs (one gasoline and one diesel) on the 6 Young's Field Road parcel, on-file at the New Milford Public Works department. The manifests, both dated July 1, 1991, indicate shipments for disposal of 550 gallons and 450 gallons (a shipment from each former UST) of flammable waste. Other than indication in the CTDEEP UST registration program file that the USTs have been removed (see discussion below and Appendix C), there was no documentation (e.g. soil quality data) of the closure of these two motor fuel USTs.

Hand notations and a laboratory analyses report for a soil sample collected on December 5, 1989, on file at the New Milford Health Department. The documentation is apparently associated with advice from the CTDEEP regarding conditions on the 6 Young's Field Road parcel. The hand notations indicates that (waste) oil should be placed in secure container, that contaminated soil, apparently associated with leaky oil storage drums, is to be excavated, stockpiled, and tested for land fill disposal, that waste oil should be manifested/disposed of at an off-site, licensed facility, that secondary containment is to be employed for storage of wastes, and that the washing of trucks on the site is to be ceased. There was no disposal documentation nor any other indication of remediation associated with the hand notations and the laboratory report on-file.

Several laboratory reports for well water samples from the 6 Young's Field Road parcel, on file at the New Milford Health Department. The reports were for samples collected January 1979 through December 1994 and were generated by the Connecticut

State Department of Health Services laboratory (earlier reports) and by the HydroTechnologies Inc. of New Milford laboratory (later reports). The results are discussed above in Section 8.4.CC.

In addition to the laboratory reports on-file at the New Milford Health Department, CCA obtained more contemporary water supply well water quality data for the 6 Young's Field Road parcel from the HydroTechnologies Inc. laboratory. HydroTechnologies Inc. collects and analyzes samples from the water supply well on a regular frequency in accordance with Connecticut State Health Department regulations. Analyses results reports provided were for samples collected from December 2013 through September 2014. The results are discussed above in Section 8.4.CC.

A CTDEEP "Automotive Service Operation Inspection Form" dated April 11, 1995 for the "New Milford Community Ambulance" on the 20 Young's Field Road parcel (indicated on the form as 12 Young's Field Road), on file at the New Milford Health Department. The inspection was conducted in response to a complaint dated March 30, 1995 (complaint form attached) regarding the washing of vehicles on that site without the proper facilities. The resolution to the complaint, as indicated on the inspection and compliant forms and an attached letter (dated August 17, 1995), was to cease the activity until proper facilities could be installed (i.e. covered area with pitched floor and an oil-water separator for wash water drain).

Hand notations and a laboratory analyses report for a soil sample collected on June 16, 1992, on file at the New Milford Health Department, apparently associated with road salt storage at the 20 Young's Field Road parcel. The context for and purpose of the hand notes and sample analyses is unclear and there is no additional associated documentation on-file indicating remedial action.

In addition to the above, New Milford Building department records noted (copies not provided herewith) included a permit to install two 330-gallon fuel oil ASTs on the 6 Young's Field Road parcel, a permit to convert the salt storage barn to a truck wash on the 20 Young's Field Road parcel, a CTDEEP General Permit Registration for vehicle maintenance waste water (i.e. for the truck wash) for the 20 Young's Field Road parcel, and a permit to add a vehicle wash bay to the south side of the building at 20 Young's Field Road (i.e. from when it was occupied by New Milford Ambulance).

Copies of the following items (documents) are enclosed in Appendix C (CTDEEP Records):

Selected CTDEEP ERSPD OCS reports for various releases in the vicinity (i.e. off-site) of the subject site that would not be included in the EDR database search due to age (pre-1991). No spill reports from the pre-1991 era were identified for the subject site. Most of the reports pertain to the Mitchell bulk fuel site, located to the southwest of the 20 Young's Field Road parcel across Young's Field Road.

The CTDEEP UST registration program file contents for the 6 Young's Field Road parcel, which includes leak detection testing documents for a 6,000-gallon gasoline UST (indicated on other documents as a 5,000-gallon UST) and an 8,000-gallon

diesel fuel UST, EMPH-6 registration forms dated March 1986 through January 2007, historical and current UST location diagrams, a letter report regarding cathodic protection testing on a gasoline and a diesel fuel UST, two CTDEEP UST compliance inspection checklists, and a registration notification form dated March 2010. The documentation indicates two historical USTs on the 6 Young's Filed Road parcel and two current in-use USTs on the parcel to the east of the 6 Young's Field Road parcel (i.e. the fueling station was moved with replacement USTs). The historical USTs include a 1,000-gallon diesel fuel UST and a 1,000-gallon gasoline UST, installed circa 1968 and 1970, respectively. The USTs are indicated as being last used in June 1989 when two replacement USTs were installed off-site on the adjoining Town parcel. It does not appear, however, that the USTs were removed until 1991 (see above discussion regarding hazardous waste manifests). Currently, there does not appear to be any USTs, motor fuel or otherwise, on the northern portion of the 6 Young's Field Road parcel.

A CTDEEP Waste Engineering and Enforcement Division (WEED) "Report of Complaint" (a form), dated December 2, 1993, regarding the transportation of drummed wastes from the Town Highway Garage (the northern portion of the 6 Young's Field Road parcel) to the Town recycling center on the 20 Young's Field Road parcel. Attached with the complaint form are two internal CTDEEP memorandums and a letter from CTDEEP to the New Milford recycling center, dated March 24, 1994, April 13, 1994, and January 30, 1995, respectively regarding inspections at the Town Highway Garage and recycling center. Apparently the Town Highway Garage (a/k/a the Public Works Garage) had been engaged in housekeeping activity as a result of an OSHA (Federal Occupational Health and Safety Administration) inspection. The recycling center does and did at the time accept waste oil and the waste oil was reportedly shipped off-site for disposal at a permitted facility. At the time the waste oil collection area was located at the northeast corner of the recycling center site. The collection/storage area found to be staged on bare soil or gravel. CTDEEP noted a number of record keeping and hazardous materials storage irregularities (e.g. storage of waste oil drums on bare ground surface, container labeling, etc.) at both facilities and advised improved material management practices.

The EDR database search report (see Appendix D) indicates two LUSTs on the 6 Young's Field Road parcel in January 1997 and October 2003. These two inventoried LUSTs are discussed above. There are also two matching OCS reports for the LUST inventory listings.

OCS reports inventoried in the EDR database search report include a January 20, 1996 release of 10,000 gallons at what appears to be the recycling center for which there is no useful information indicated (i.e. circumstances, type of material released, response action, etc.). The release is indicated as being terminated. No additional information regarding the release was identified during the CTDEEP file search of OCS correspondence records.

Additional OCS reports for the subject site parcels inventoried in the EDR database search report include a 10 gallon release of hydraulic oil from a payloader (June 25, 1993), and oily seepage associated with storage that was unsubstantiated (July 21, 2001). There are other spills

reported for "Young's Field Road" that may or may not be for the subject site, but are of relatively minor quantities.

The one MANIFEST listing in the EDR database search report matches one of the documented July 1, 1991 shipment of flammable hazardous waste from the 6 Young's Field Road parcel discussed above.

The UST registration listing in the EDR database report for the 6 Young's Field Road parcel matches the records on-file at the CTDEEP.

Additional items reviewed (historical maps and aerial photographs, land ownership records, etc.) are discussed in the pertinent sections of this report.

8.6 EVALUATION OF STATE/FEDERAL/LOCAL/SITE DATA RELATIVE TO POTENTIAL CONTAMINANT SOURCES AND REGULATORY COMPLIANCE CONCERNS

A. Site:

There are five documented historical petroleum product USTs for the 6 Young's Field Road parcel of the subject site. Of these three had contained heating fuel oil, one had contained gasoline, and one had contained diesel fuel. The heating fuel oil USTs appear to have been associated with buildings Nos. 1, 2, and 4, while the gasoline and diesel fuel USTs were part of a motor vehicle fueling station located to the east of Building No. 5. Two of the heating fuel oil USTs are inventoried LUSTs and were associated with Buildings Nos. 1 and 2. Records indicate remedial response action was performed at these two LUSTs but at one of them (the UST associated with Building No. 1) soil contamination had extended beyond the apparent LUST impact zone, an indication that contaminated soil was present in the area prior to the LUST release incident. For the other LUST (at Building No. 2) it appears that all of the contaminated soil had been remediated. For the UST at Building No. 4, soil quality data associated with its closure indicate that concentrations of PHCs are within applicable Connecticut clean-up criteria, but this is based upon a composite sampling scheme. There is no soil quality data associated with the removal of the gasoline and diesel fuel USTs. Based upon the information provided, the former motor fuel USTs and the former fuel oil UST that was associated with building No. 1 are outstanding AOCs for the 6 Young's Field Road parcel due to the documented termination of the remedial action at the fuel oil UST before all apparent impacted soil was removed and because of the lack of soil quality data associated with the closures if the motor fuel USTs.

Various documents associated with complaints, inspections, spills, etc. in conjunction with current site observations at the subject site indicate that the 6 Young's Field Road parcel may have several scattered AOCs associate with vehicle maintenance and the storage of virgin and waste petroleum based products. The 20 Young's Field Road parcel AOCs would include salt storage areas, particularly if there is the potential to affect a water supply well or other sensitive receptor, and current and historic (i.e. on

the northeast corner of the recycling center site) hazardous material collection areas at the Town recycling center.

It is noted that per historical and recent available water quality data (samples analyzed by a laboratory) it appears that any impacts associated with site AOCs have not affected the on-site water supply at 6 Young's Field Road. The well is reportedly 160 feet deep, however, and therefore may not yield water quality data samples representative of shallow aquifer groundwater.

As discussed in Section 8.4.DD. certain information and observation collected/made during this ESA indicates potential qualification of the subject site for compliance with the Connecticut Property Transfer Law (CGS 22a-134 through 22a-134(e)) and the Connecticut RSRs (RCSA 22a-133k-1 through 22a-133k-3).

Additionally, it is noted that undisclosed, undocumented, or undiscovered conditions may exist that could have affected the subject site.

B Off-Site:

While there is ample indication of off-site "high risk" land use and activity in the vicinity of the subject site (e.g. the Town Public Works motor vehicle fueling station located on the adjoining parcel to the east of the 6 Young's Field Road parcel, a dry cleaning facility located on Railroad Avenue, to the east of the subject site), there were no specific conditions identified during the ESA described herein at a location that would be expected to present a material threat of potential significant offsite source impacts to the subject site. It is noted however that undisclosed, undocumented, or undiscovered conditions may exist that could have affected the subject site.

Off-site sources of groundwater contamination at a given parcel are not the responsibility of the owner or occupant of such parcel per CTDEEP policy. Furthermore, ingestion or direct exposure risk associated with any impacted groundwater beneath the subject site would be mitigated by connection to a public water supply (as at the 20 Young's Field Road parcel).

9.0 EVALUATION

This Phase I ESA of the approximate 8-acre site located at 6 and 20 Young's Field Road in New Milford, Connecticut (the subject site) has been performed in general conformance with the scope and limitations of ASTM Practice E 1527-13 and the CTDEEP Site Characterization Guidance Document (Sept. 2007). It is noted that the subject site is comprised of the entire parcel of land with the assigned address of 20 Young's Field Road and the northern portion of the parcel of land with the assigned address of 6 Young's Field Road, and are non-contiguous, as described in the introductory section of this report. The southern portion of 6 Young's Field Road, which is a Town of New Milford recreational area (ball fields), is not considered to be part of the subject site for the purposes of this ESA. Any exceptions to, or deletions from, this practice are described in appropriate sections of this report. This assessment has revealed evidence of recognized environmental conditions (RECs) in connection with this property as follows:

9.1 *POTENTIAL ON-SITE SOURCES OF CHEMICAL CONTAMINATION*

The following specific environmental AOCs for the subject site have been identified as a result of the Phase I ESA described herein:

For the 6 Young's Field Road Parcel:

The former motor fuel USTs and fueling station that were located to the east of Building No. 5 (i.e. since there is no confirmatory soil quality data associated with their closure);

The apparent zone of contaminated soils that was left to remain in place at the completion of the LUST remediation to the north of Building No.1 (where a passive venting system installed);

A floor drain observed inside the Bradin Building (need to confirm that it discharges to the sanitary sewer);

Any current or former hazardous material storage and handling areas, mostly associated with vehicle maintenance in and around the buildings, including but not necessarily limited to ASTs (fuel oil, diesel (for emergency generators), and waste oil), overhead doorways and other portals; and,

An apparent area of oil staining and fill to the rear of Buildings Nos. 2 and 3 (see Photographs Nos. 19 and 20 in Appendix A).

For the 20 Young's Field Road Parcel:

The catch basin sediment disposal pit located on the southern portion of the parcel where currently there is also road salt storage and other miscellaneous outdoor storage (since catch basin sediments are often associated with PAHs, PHCs and metals);

The apparent fill located along Young's Field Road at the southern end of the parcel (because of unknown source and quality);

Current and past recycling center hazardous material collection and handling areas (documentation indicates a past hazardous material collection and handling area over exposed ground surface on the northeast corner of the recycling center site, which may be the same location as the current area);

The historic railroad spur yard, turntable, and roundhouse on the southern portion of the parcel (since railroad yards are often associated with impact to soil by PHCs, PCBs, and metals, primarily arsenic); and,

Current and historical outdoor road salt storage areas, particularly if there are any consumptive water supplies nearby.

It is noted that due to the age of the subject site buildings, LBP, ACMs, and other hazardous building materials (e.g. caulking with PCBs) may be present.

Additionally, it is noted that undisclosed, undocumented, or undiscovered conditions may exist that could have affected the subject site.

The above described AOCs are of the general type cited in the CTDEEP Site Characterization Document, dated September 2007, because of the potential of intentional improper discharge or accidental spillage, seepage, etc. of contaminating substances in such areas. The CTDEEP Draft Site Characterization Document is the current prevailing reference standard for surface/subsurface investigations in the State of Connecticut.

9.2 POTENTIAL OFF-SITE SOURCES OF CHEMICAL CONTAMINATION

While there is ample indication of off-site "high risk" land use and activity in the vicinity of the subject site (e.g. the Town Public Works motor vehicle fueling station located on the adjoining parcel to the east of the 6 Young's Field Road parcel, a dry cleaning facility located on Railroad Avenue, to the east of the subject site), there were no specific conditions identified during the ESA described herein at a location that would be expected to present a material threat of potential significant offsite source impacts to the subject site. It is noted however that undisclosed, undocumented, or undiscovered conditions may exist that could have affected the subject site.

Off-site sources of groundwater contamination at a given parcel are not the responsibility of the owner or occupant of such parcel per CTDEEP policy. Furthermore, ingestion or direct exposure risk associated with any impacted groundwater beneath the subject site would be mitigated by connection to a public water supply (as at the 20 Young's Field Road parcel).

9.3 REGULATORY COMPLIANCE CONCERNS

As discussed in Section 8.4.DD., the EDR database report contained two indications of possible qualification of the 6 Young's Field Road parcel as a hazardous waste

“establishment” under the Property Transfer Law of Connecticut (CGS Sections 22a-134 through 22a-134e). In addition to the EDR database listing, hazardous waste manifests for the disposal of liquid residuals associated with LUSTs were on file at the New Milford Public Works department (see Section 8.5). Whether these constitute qualification of the parcel as an “establishment” under the law is should be determined by qualified legal counsel experienced with the Property Transfer Law. Hazardous waste “establishments” are required to enter the CTDEEP PTP upon certain ownership changes. The PTP is a CTDEEP formal remediation program and as such, transferred hazardous waste “establishments” are subject to investigation and remediation if indicated by investigation of site environmental media in accordance with the prevailing guidelines (prescribed by CTDEEP) and to eventual compliance with the Connecticut RSRs (RCSA Sections 22a-133k-1 through 22a-133k-3).

9.4 RECOMMENDATIONS

Qualified legal counsel familiar with the Connecticut Property Transfer Law should be consulted to determine the status of the 6 Young’s Field Road parcel as a hazardous waste “establishment” under that law. In addition, the status relative to the Property Transfer Law of the 20 Young’s Field Road parcel due to the presence of the recycling center should be evaluated since “household hazardous waste” is collected there for disposal.

Dependent upon the environmental liability risk tolerance of any parties associated with the subject site, CCA recommends a “Phase II ESA” subsurface soil and groundwater quality investigation of the subject site AOCs. A Phase II ESA investigation would involve the performance of soil test borings for the purpose of soil sample collection, screening and laboratory analyses for Substances of Concern (SOCs) commonly associated with the site AOCs (e.g. VOCs, PHCs, etc.), and the installation of shallow groundwater monitoring wells, followed by the collection of groundwater samples for analyses of the site SOCs.

If the subject site buildings are to be demolished or renovated, an appropriate survey for the presence of ACMs and LBP (and other hazardous building materials) should be performed.

10.0 LIMITATIONS

The conclusions and recommendations presented herein are based solely on the information reviewed by CCA, LLC and described within this submittal. CCA has performed this Environmental Assessment in accordance with standard professional practice using the degree of skill and care exercised for similar projects by similar firms under similar conditions. CCA shall not be held responsible for conditions or consequences resulting from relevant information not fully disclosed at the time of this study. CCA is not responsible for independently verifying the accuracy or completeness of any information provided by the client, client's agents, or third parties including state and local employees. In addition, future events at the site or surrounding properties may alter these findings. The project staff, listed below, certifies that they have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. All appropriate inquiries have been developed and performed in conformance with the standards and practices set forth in 40 CFR Part 312.

Paul J. Connelly, L.E.P.
Site Investigation Manager

Auditor



I declare that to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 312.



Ralph A. Klass, P.E., L.E.P.
Director of Environmental Engineering

Project Manager