STONE ENVIRONMENTAL

535 Stone Cutters Way / Montpelier / VT / 05602 / USA
802.229.4541 / info@stone-env.com / www.stone-env.com

January 28, 2019

Dan Albrecht
Senior Planner
Chittenden County Regional Planning Commission
110 West Canal Street, Suite 202
Winooski, Vermont 05404

Stone Project No. 17-070
Subject: Proposal – HULA Corrective Action Plan/Risk-Based Cleanup Plan and Soil Management Oversight

Dear Dan,

Stone Environmental, Inc. (Stone) is pleased to present Chittenden County Regional Planning Commission (CCRPC) with this proposal to draft a Corrective Action Plan (CAP)/Toxic Substance Control Act (TSCA) Risk-Based Cleanup Plan and perform soil management oversight at the HULA property located at 32 – 50 Lakeside Avenue in Burlington, Vermont (the Site). Based on the results of Stone's Phase II Environmental Site Assessment (ESA) areas of the 50 Lakeside Avenue building concrete slab and walls are contaminated with polychlorinated biphenyls (PCBs) as a result of former commercial oven manufacturing. PCBs are also present in window glazing and caulk in select portions of the 50 and 36 Lakeside Ave. buildings. Polycyclic aromatic hydrocarbons (PAHs) are present in in fill soil near the 50 Lakeside Avenue building loading dock, and a rail spur on the north side of the 50 Lakeside Avenue building where a spur to the Burlington bike path is proposed. Corrective actions are required to prevent unacceptable risk of exposure to PCB-contaminated concrete and caulk and PAH-contaminated soil to Site workers and future Site users. HULA intends to redevelop the Site for office space, ancillary support services, and recreational uses. This proposal has been prepared in response to your request for a CAP and soil management proposal at the January 22, 2019 CCRPC Brownfields Committee meeting.

Site corrective actions are under consideration in the context of an Evaluation of Corrective Action Alternatives (ECAA) report dated January 17, 2017. The ECAA report is currently under review by the Vermont Department on Environmental Conservation (VT DEC) Site Manager, Michael Smith. Preferred corrective actions selected by HULA include:

1. PCBs in 50 Lakeside Avenue building materials: Targeted removal of PCB-contaminated concrete and walls and installation of a 4-inch concrete cap over remaining contaminated concrete.
2. Removal of PCB contaminated caulk and window glazing during renovations to the 36 and 50 Lakeside Avenue buildings.
3. PAH-contaminated soil: Maintain all PAH-contaminated soil on Site by regrading and installation of remedial barriers.

1. Proposed Scope of Work

The proposed scope of work includes preparation of remedial planning documents and project coordination. Stone also presents for CCRPC's consideration proposed scope and estimated costs to perform soil management oversight tasks during implementation of the CAP.

1.1 Corrective Action Plan

Stone will prepare a CAP in accordance with the VT DEC Investigation and Remediation of Contaminated Properties Rule (IRule), effective July 27, 2017. The CAP will include the following tasks:

1. Executive summary;
2. Public notice – the VT DEC requires a 30-day public comment period for all CAPs;
    a. Stone will draft notice of public notice letters to adjoining property owners per IRule requirements.
3. Performance standards;
    a. A discussion of how the remedial action achieves remedial objectives;
    b. A list of applicable environmental media standards;
    c. A map identifying compliance points used to monitor compliance with regulatory standards for each impacted media and a discussion of why these points were chosen;
    d. An explanation of how the remedial actions will eliminate pathways to sensitive receptors;
    e. An estimate of contaminant mass removal; and
    f. A list of permits required for the project.
4. Remedial construction plan including detailed plans to be reviewed by a Vermont licensed professional.
    a. For engineered barriers, figures and plans will include layout and cross-sectional detail drawings. Specifications for Site features that may serve as a barrier (e.g. parking lot, bike path, greenspaces, etc.) will be developed by a structural or civil engineer.
5. Waste management plan.
6. Implementation schedule;
7. Operations and maintenance plan – this will detail monitoring and service intervals required for inspection and maintenance of the engineered barriers;
8. A discussion of institutional controls – The Certificate of Completion received from the Vermont Brownfields Reuse and Environmental Liability Limitation Program (BRELLA) will serve as the Site's institutional control.
9. Quality assurance and quality control plan;
10. An updated set of maps and tabular data sets by environmental media; and

11. A list of all proposed contractors and subcontractors – Stone assumes the Site owner will select construction contractors.

Stone will attend a public meeting in Burlington to present the project, on behalf of Lakeside Oven LLC, as required by the IRule.

1.2 Risk-Based Cleanup Plan

The CAP will also be submitted to US Environmental Protection Agency (EPA) Toxic Substance Control Act (TSCA) Division as an amendment to a Risk-Based Cleanup Plan (RBCP). The RBCP will satisfy requirements for PCB cleanups in accordance with 40 CFR 761.61(c).

1.3 Project Coordination

We anticipate attending up to three meetings in Burlington, Vermont to 1) discuss Site design with the HULA project team, 2) discuss VT DEC/EPA remedial planning document comments prior to drafting a final CAP/RBCP, and 3) present the project at a public meeting. In addition, 1-hour/week for a three month duration has been budgeted for Stone's Project Manager for ongoing coordination between the HULA project team, VT DEC, and EPA.

1.4 Soil Management Oversight

Stone will provide construction oversight and documentation during the period of Site redevelopment when PAH-contaminated soil is disturbed and periodic construction oversight during engineered barrier installation. For the purposes of this proposal and based on our experience with similar projects, Stone assumes that PAH-contaminated soil will be exposed for a two-week period and will require environmental oversight for 8-hours/day 5-days/week (80 hours). Engineered barrier installation will take two weeks requiring environmental oversight for 8-hours/day 2-days/week (16 hours total). Stone has also budgeted 8-hours/week for project management during soil management activities (32 hours total). The project schedule is currently being refined by the construction management team. Stone will provide CCRPC with updates as they become available.

2. Project Resources

Lee Rosberg is Stone's Project Manager and lead technical resource on the project. Mr. Rosberg will be supported by Stone staff experienced in remedial planning document preparation and construction oversight. David Abrahamson will review all project deliverables and serve as the Vermont Licensed Professional Engineer for the CAP/RBCP.

3. Schedule

The proposed schedule to complete the CAP/RBCP is presented in Table 1, below.

Table 1: Proposed CAP/RBCP Schedule

Task	Duration	Anticipated Start Date	Anticipated Completion Date
Draft ECAA	1 week	January 10, 2019	January 16, 2019
Regulatory Review*	2 weeks	January 16, 2019	January 30, 2019
Final ECAA/DEC Approval	1 week	January 30, 2019	February 6, 2019
Draft CAP/EPA Cleanup Plan	2 weeks	February 6, 2019	February 20, 2019
Regulatory Review**	30 Days	February 20, 2019	March 22, 2019
Revised CAP/EPA Cleanup Plan	1 week	March 22, 2019	March 29, 2019
Regulatory Review**	30 Days	March 29, 2019	April 29, 2019
Public Comment Period	30 Days	April 29, 2019	May 29, 2019
Public Meeting***	1 day	Approximately May 20, 2019	

*May be longer or shorter pending Site Manager schedule

**EPA has 30-days to comment on cleanup plan, if no comments are received the plan can be implemented. Revised schedule assumes that EPA comments will require one round of revisions and subsequent 30-day review period.

***Stone will target a regularly warned public meeting, such as the May 20, 2019 City Council Meeting.

4. Cost

Stone's estimated cost to complete the scope of work described above is $34,963 as summarized in Table 2 below and the attached detailed cost estimate.

Table 2: Cost Summary

Cost Summary				
Task	**Professional Services**	**Consultant**	**Expenses**	**Total**
Task 1 – Remedial Planning Documents				
Task 1a - Corrective Action Plan	$8,624	$0	$200	$8,824
Task 1b - Risk-Based Cleanup Plan	$6,768	$0	$200	$6,968
Task 1c - Project Coordination	$4,476	$0	$139	$4,615
SUBTOTAL	$19,868	$0	$539	$20,407
Task 2 - Soil Management Oversight	$13,056	$0	$1,500	$14,556
TOTAL	$32,924	$0	$2,039	$34,963

We appreciate your consideration in supporting the revitalization of the 32-50 Lakeside Avenue property. The proposed remedial actions are an integral part of the successful redevelopment of this key Brownfield property on Burlington's waterfront. Please do not hesitate to contact me with any questions regarding this proposal.

Sincerely,

Lee Rosberg
Project Manager
Direct Phone / 802.229.5378
Mobile / 802.309.1629
E-Mail / lrosberg@stone-env.com

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Lakeside Avenue Remedial Planning Documents, Project Coordination, and Soil Management Oversight
17-070
DETAILED FEE & SCOPE DETAILS

#	Staff Type	Rate Per Unit	Unit	Amount	Subtotal	Scope Details
1	**Task 1a - Corrective Action Plan**					Draft Corrective Action Plan (CAP) in accordance with VT DEC Investigation and Remediation of Contaminated Properties Rule (IRule) for VT DEC review.
	Professional Services					
	Senior Professional 2	$ 145 / hour	12	$1,740		One meeting in Burlington, Vermont to review redevelopment plan and attend one public meeting to present CAP to public.
	Project Professional 2	$ 114 / hour	40	$4,560		
	Staff Professional 3	$ 98 / hour	20	$1,960		Staff:
	Staff Professional 2	$ 91 / hour	4	$364		- Senior Engineer to provide technical review of CAP (12 hours).
	Professional Services Summary		*76*		*$8,624*	- Project Professional to draft CAP (40 hours).
	Stone Equipment					- Staff Professional to draft AutoCAD specification details and compile data summary tables (20 hours)
	EAR AutoCAD Civil 3D	$10 / hr	20	$200		- Staff Professional to update GIS figures (4 hours)
	Expense Summary				*$200*	
	TASK SUBTOTAL				**$8,824**	
2	**Task 1b - Risk-Based Cleanup Plan**					Draft Notification of Risk-Based Cleanup Plan in accordance with 40 CFR 761.61(c) for US EPA Region 1 PCB Coordinator review.
	Professional Services					
	Senior Professional 2	$ 145 / hour	8	$1,160		Prepare final update to to the Risk-based Cleanup Plan based on EPA and VT DEC comments.
	Project Professional 2	$ 114 / hour	32	$3,648		
	Staff Professional 3	$ 98 / hour	20	$1,960		
	Professional Services Summary		*60*		*$6,768*	
	Stone Equipment					
	EAR AutoCAD Civil 3D	$10.00 / hr	20	$200		
	Expense Summary				*$200*	
	TASK SUBTOTAL				**$6,968**	
3	**Task 1c - Project Coordination**					Attend three meetings in Burlington, VT to 1) review redevelopment plan with project team to refine CAP, 2) review proposed cleanup with VT DEC Site Manager and EPA PCB Coordinator, and 3) present the project at one public meeting.
	Professional Services					
	Senior Professional 2	$ 145 / hour	12	$1,740		Project Manager budgeted 1-hour/week for ongoing coordination with HULA's project team, VT DEC, and EPA. Assumes 3-month duration
	Project Professional 2	$ 114 / hour	24	$2,736		
	Professional Services Summary		*36*		*$4,476*	
	Stone Equipment					
	Tacoma Mileage	$0.58 / mile	240	$139.20		
	Expense Summary				*$139*	
	TASK SUBTOTAL				**$4,615**	
4	**Task 2 - Soil Management Oversight**					Stone to provide construction oversight and documentation during period when PAH contaminated soils are exposed and periodic oversight during barrier installation.
	Professional Services					
	Project Professional 2	$ 114 / hour	32	$3,648		Assumptions:
	Staff Professional 3	$ 98 / hour	96	$9,408		
	Professional Services Summary		*128*		*$13,056*	1) Two weeks of soil management oversight by Staff Engineer (8 hours/day, 5 days/week: 80 hours total)
	Stone Equipment					
	EAR Tacoma Usage Fees	$500 / week	3	$1,500		2) Two weeks of periodic barrier installation oversight by Staff Engineer (8 hours/day, 2 days/week: 16 hours total)
	Expense Summary				*$1,500*	
	TASK SUBTOTAL				**$14,556**	3) Assumes 8 hours/week for project manager during soil managment activities (32 hours total)
	PROJECT TOTAL				***$34,963***	

Stone Environmental's standard mark-up on all Consultant and reimbursable project expenses is 10%.