



August 30, 2019

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

Emily Nosse-Leirer  
Planner  
Chittenden County Regional Planning Commission  
110 West Canal Street, Suite 202  
Winooski, VT 05404

Re: Proposal – Phase I Environmental Site Assessment, Montpelier Granite Works Site, 43-65 Granite Shed Lane in Montpelier, Vermont

Dear Emily and Dan:

VHB is pleased to present Chittenden County Regional Planning Commission (CCRPC) with the following Proposal for a Phase I Environmental Site Assessment (ESA) of the Montpelier Granite Works Site (SMS# 20170-4714) located at 43-65 Granite Shed Lane in Montpelier, Vermont (the Site).

The Johnson Company (JCO) merged with VHB in March 2019 to integrate and bolster the services available to our clients. For the purposes of this document, the entity performing services prior to the merger will be referred to as JCO and the entity performing services after March 2019 will be referred to as VHB.

Prior to the March 2019 merger with VHB, JCO performed a Phase II Environmental Site Investigation (ESA) at the Site, as summarized in JCO's *Phase II ESA Investigation Report, Montpelier Granite Works* dated May 2018. Results from this investigation identified a layer of a light non-aqueous phase liquid (LNAPL), likely a weathered mineral spirits product, floating on groundwater in monitoring well MW-6, which is located in the north end of the main manufacturing building. The product thickness was measured at 2 feet in January 2018 and 0.7 feet in April 2018 and encountered at approximately 3 – 5 feet below ground surface (the building floor elevation). To further evaluate this release, JCO also performed a soil vapor investigation at the Site in February 2019, as summarized in the *JCO Soil Vapor Investigation Report, Montpelier Granite Works* dated March 2019. Results from the soil vapor investigation indicated exceedances of petroleum-volatile organic compound (VOC) constituents in the soil vapor under the north end of the main manufacturing building, proximate to the location of the LNAPL.

Polycyclic aromatic hydrocarbon (PAH) and polychlorinated biphenyl (PCB) impacts were also identified at select locations in Site soil. VHB is currently in the corrective action planning phase of the project that is

40 IDX Drive, Building 100  
Suite 200

**Engineers | Scientists | Planners | Designers**

South Burlington, Vermont 05403

P 802.497.6100

F 802.495.5130



being funded through the Lamoille County Planning Commission's (LCPC) limited remaining grant funding, which will end on December 30, 2019.

This proposal includes the performance of a Phase I ESA, which will support a potential property transaction between the current property owner (Michelle Parker of Granite Values) and the perspective purchaser, Connor Brothers Redevelopment Company, LLC, located at 1100 US Route 2 in Berlin, Vermont.

### **Proposed Scope of Work**

The primary objective of the Phase I ESA is to identify the presence of recognized environmental conditions (RECs), historical recognized environmental conditions (HRECs), and controlled recognized environmental conditions (CRECs) in the form of hazardous waste, petroleum products and/or solid waste issues that are presently (and/or previously) associated with the Property. These ESAs will be conducted within the scope and limitations of the American Society for Testing and Materials' (ASTM) Standard Practice for Environmental Site Assessments E 1527-13 and in compliance with the federal regulations for environmental due diligence: 40 CFR Part 312, Standards and Practices for All Appropriate Inquiries.

The information gathered during the Phase I ESAs will be used to form an opinion of the nature of the environmental conditions and will provide a basis from which a scope could be developed for Phase II ESA investigations, if warranted. The following tasks will be included in the Phase I ESA for the property:

- Interviews with past and present owners, operators, and occupants (§ 312.23)
  - *Environmental Questionnaire.* A questionnaire concerning background information, solid and hazardous wastes, surface water/water quality, air pollution, spills, underground storage tanks, polychlorinated biphenyls (PCBs), and asbestos is provided to the person deemed to be the most knowledgeable about the site history.
  - *User Questionnaire.* A User questionnaire specific to the AAI standards provided by VHB for preparation by each property owner, or whoever will be considered the User of the ESA information.
  - *General Interviews.* Telephone and / or in-person interviews will be conducted, when possible, with current occupants, former occupants, neighboring property owners, the local fire chief, the local health officer, and other individuals who may be knowledgeable of the Sites and past emergency spill or environmental releases.
- Search for recorded environmental cleanup liens (§ 312.25)
  - VHB will perform a review of the local Land Records. If an environmental lien is identified that is associated with the sites it will be identified in the Phase I reports. In accordance with ASTM standards the lien search is a user responsibility and should be completed by a title professional.
- Review of federal, tribal, state, and local government records (§ 312.26)
  - *Regulatory file review.* VHB will check the site status with applicable regulatory authorities to determine if spills or other events of environmental concern have occurred on the properties. We will determine if the properties are currently on any hazardous sites lists with the state and federal governments.



- Visual inspections of the facilities and of adjoining properties (§ 312.27)
  - *Site Reconnaissance.* We will perform a site reconnaissance at the property to visually assess the site and note any evidence of potential releases of hazardous materials to the environment and any potential receptors in the area. The site reconnaissance will involve looking for products or wastes on the ground, surface soil staining, sheens or discoloration of surface water, areas of dead or stressed vegetation, and other site features such as UST fill and vent lines, evidence of buried materials and drums, all of which may be indicators of existing contamination.
- A declaration by an Environmental Professional as to the presence of RECs and an opinion as to the significance of the environmental conditions identified. (§ 312.21(d)).
- VHB staff will prepare maps in GIS or CAD using available data, including GIS files provided by the City of Montpelier, if available.
- Property history will be gathered to establish the past uses of each of the properties. This will consist of a review of available land records as necessary to determine the ownership history. If available, aerial photographs will be studied to help identify previous structures that might indicate any past disposal and storage practices. VHB will attempt, using a reasonable approach consistent with the AAI standard, to trace the site histories back to their earliest developed use. We will conduct interviews with present and past (if possible) owners or operators of the sites, or others familiar with the history of the area. We will also perform a review of land use records (as necessary), including a search for environmental liens, which is a specific requirement of the newly promulgated AAI standards. We will review available early United States Geological Survey (USGS) topographic maps and/or Sanborn Fire Insurance maps, which may provide us with a historical record of past use of the property dating back to the late 1800s.
- Findings of the assessments and recommendations regarding further investigations will be presented in a written report for the Site that conform with reporting requirements in ASTM E 1527-13 Part 12 and/or 40 CFR Parts 312.21 and 312.31 (AAI Final Rule). The report will include an overview of the scope of the Phase I ESA, a discussion of the methodologies and inquiries, and a results section discussing the physical setting, site background and history, regulatory status and conclusions. The report will include a summary of sensitive receptors and location, using as much information as may be available. Furthermore, for each identified environmental condition (REC, HREC, CREC, and non-scope), VHB will provide a narrative description of the condition, followed by a brief description of recommended investigative actions or methods which would lead to a conclusion about whether or not there is a presence of hazardous or petroleum substances at each site. A site plan or map utilizing icons or descriptive call out arrows will be included in each report to show important site features and any recognized environmental conditions and non-ASTM scope environmental conditions which may be identified. The site plans or maps will also illustrate information about environmental conditions characterized in whole or in part by previous site investigations. VHB will construct the plans or maps needed to clearly illustrate features.

### **Schedule**

This work will be completed such that it is completed within less than 6 months of the property transfer, such that this Phase I ESA is valid and compliant in accordance the ASTM longevity Phase I ESA requirements. A closing date has not yet been established but is anticipated to occur in early 2020.



**Estimated Probable Cost**

VHB estimates the cost of the Phase I ESA to be approximately \$3,900. In addition, VHB assumes two meetings will be required at the CCRPC office, each costing approximately \$300. Therefore, the total estimated budget for the Phase I ESA and the two meetings is **\$4,500**. Should additional time and/or expenses be required to complete this project, a detailed description of the circumstances leading to any needed additional effort, along with a proposed revised budget, will be prepared and submitted to CCRPC for review and approval prior to proceeding with any additional work.

We appreciate the opportunity to provide this proposal to you to conduct a Phase I ESA of the Montpelier Granite Works Site. If you have any questions regarding this proposal or require additional information, please contact me.

Sincerely,

Vanasse Hangen Brustlin, Inc.

A handwritten signature in black ink, appearing to read "Kurt Muller", with a long horizontal line extending to the right.

Kurt Muller, P.E.

Senior Environmental Engineer  
[kmuller@vhb.com](mailto:kmuller@vhb.com)