TO: Chittenden Co. Regional Planning Commission & Brownfields Advisory Committee  
FROM: Town of Westford Planning Commission  
DATE: December 3, 2019  
RE: Brownfield Phase II Environmental Site Assessment & Funding at 1705 VT Route 128

**Project Background:**  
After nearly 50 years the Westford Town Offices have run out of space. The current Town Offices building is not suitable for improvement and a new building is necessary. An adjoining property is for sale and the combined redevelopment of the Town Offices property and this site provides a unique opportunity to shape the future of the Village “Main Street”. The owner is working with the Town on an environmental site assessment preliminary to developing a combined future vision for the site.

The Town Offices/Public Library property and the subject parcel form the core of Westford’s Designated Village Center and Neighborhood Development Area. These properties are located within the Common and Form Base Code Overlay Districts, and can be re-subdivided with a wide variety of development options. Form-based architectural and site design standards will guide building outcomes on each parcel. Redevelopment of the combined properties will provide new residential and non-residential growth that will stimulate the local economy, diversify our grand list, and provide new affordable housing options. Compact density on these properties is enabled by their location within the future service area of a community wastewater system.
Project objectives and progress to date:

In the Fall 2019 the Westford Select Board requested the Westford Planning Commission investigate the feasibility of purchasing and facilitating redevelopment of the subject parcel, approximately 3.3 acres, located at 1705 VT Rt.128. An ad hoc sub-committee was appointed with the following mission:

*Develop a plan to leverage the 1705 Route 128 property to solve the immediate need of new Town Offices and affordable/moderately priced housing as well as incorporate as many value-added uses that surveys and forums have identified as strongly desired by the community. This project will serve the vital role of catalyst, stimulating economic development within our village center while providing critical municipal facilities, affordable/moderately priced housing, commercial development and recreational opportunities.*

The sub-committee has established the following development priorities:

1) Foster revitalization of Westford’s village center as envisioned in the Town Plan and according to the Form-Based Code (FBC). Leverage benefits afforded by status as a Neighborhood Development Area and Designated Village to provide local businesses, municipal services, and new residences in a setting that fosters robust civic life.

2) Pursue opportunities to provide affordable/modestly priced housing in the village center. Westford’s lack of affordable and moderately priced housing dissuades younger people from moving here and prevents older generations from downsizing from homes that no longer meet their needs. A goal of this project is to increase affordable/modestly priced housing options for new and existing residents.

3) Provide public access to the Browns River. There is currently no public access to the Browns River. Public access to the river would fulfill a long-held goal of town residents, and is an amenity that would benefit businesses in the village center. The subject parcel is ideally located to allow public access to an area below waterfalls and covered bridge on the Browns River.

4) Provide for new and expanded Town Offices to establish a strong, civic anchor for the entire village center. A new municipal building is needed to safeguard ever-expanding town documents, and to provide public meeting that is accessible to all residents. Redevelopment could also provide a convenient central location for critical services like a Post Office and/or a day care center. After careful assessment the sub-committee concluded the Town Offices should remain adjacent to the Public Library due to the sharing of staff, equipment, etc. Purchasing the subject parcel will allow for a larger building footprint with improved parking and safer access management for vehicles and pedestrians.
5) Establish a compact pedestrian friendly atmosphere in the village with site design that encourages pedestrian mobility with shared parking located behind buildings so motorists park once to access multiple municipal, residential, commercial and recreational uses, and community events. These include year-round public events on the Town Common, White Church on the Common (performance space) and Brick Meeting House (community space) as well as community recreational assets (public trails, Browns River and Westford Town Lands). Envisioned pedestrian infrastructure includes a sidewalk on Rt. 128, paths connecting buildings and natural areas, and a crosswalk(s) to the adjacent Town Common.

The attached plan illustrates the five economic development priorities stated above, and the development density as Village Main Street infill under the Form-based Code (FBC).

The Planning Commission recognizes that this project is a challenging undertaking for our community of approximately 2100 residents. However, it is crucial to the revitalization our village center and our future as a whole.

In consideration of this application the Town of Westford respectfully requests the CCRPC fund 100% of Phase II Environmental Site Assessment of the 1705 Route 128 property. As we work towards identifying viable funding and redevelopment partners your financial support at this time is timely and sincerely appreciated.

Thank you for your consideration and your valued support.
Designated Village and Neighborhood Development Area status

Water Resources/River Corridor Buffer Area

Remaining 2 acres with development potential for cottage type housing

Paths provide public access to river

Existing crosswalk

Town Common

Library

Town Offices
Many destinations of community value within walking distance of the site

Village Center Context and Zoning:
Common District and Form-based Code

Straightforward and predictable
Form-based standards
November 20, 2019

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

RE: Work Plan and Price Proposal for Brownfields Phase II Environmental Site Assessment
Pigeon Property, 1705 Route 128, Westford, Vermont

Dear Dan,

LEE is pleased to present this price proposal and the attached work plan for a Brownfields Phase II Environmental Site Assessment (ESA) at 1705 Route 128 in Westford, Vermont. The work plan describes the technical approach to addressing Recognized Environmental Conditions (RECs) identified in the Phase I ESA report. Please look these materials over and let me know if there are any questions. To engage the work, please issue a task order per the Master Services Agreement and we will get started as soon as possible.

Pricing

LEE will perform the Brownfields Phase II ESA on a fixed price basis, which includes all labor, equipment, and expenses: $29,750. A task breakdown is included below:

<table>
<thead>
<tr>
<th>Task</th>
<th>Cost</th>
</tr>
</thead>
<tbody>
<tr>
<td>QAPP Preparation</td>
<td>$1,980</td>
</tr>
<tr>
<td>UST Removal and Sampling</td>
<td>$11,260</td>
</tr>
<tr>
<td>Soil Sampling</td>
<td>$8,570</td>
</tr>
<tr>
<td>Groundwater and Drinking Water Sampling</td>
<td>$2,950</td>
</tr>
<tr>
<td>Report Preparation</td>
<td>$4,740</td>
</tr>
<tr>
<td>CCRPC Meeting</td>
<td>$250</td>
</tr>
</tbody>
</table>

This pricing is provided subject to the following assumptions:

- EPA/DEC approves the work as written.
- One, 500 gallon capacity gasoline UST is encountered.
- A $300 allowance is included for snow removal.
- All drill cuttings and purge water are disposed of on-Site. If LEE needs to drum the investigation derived wastes and/or dispose of them in a different manner, there will be additional charges for that.
The final report is issued electronically in PDF format. Hard copies can be provided for an additional fee to cover the printing.

Please call with any questions. Thank you.

Sincerely,

Angela Emerson, PG, EP
Senior Geologist
LEE # 19-138
Brownfields Phase II Environmental Site Assessment
Work Plan

Pigeon Property
1705 Route 128
Westford, Vermont

SMS # Not Assigned

November 20, 2019

Prepared For:
Chittenden County Regional Planning Commission
110 West Canal Street, Suite 202
Winooski, Vermont 05404

LE:Environmental
21 North Main Street
Waterbury, Vermont 05676
(802) 917-2001
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LEE # 19-138
# Contents

1.0  INTRODUCTION AND BACKGROUND ......................................................................... 2  
2.0  PROPOSED WORK SCOPE ...................................................................................... 3  
  2.1  SSQAPP Addendum .................................................................................................. 3  
  2.2  Pre-Excavation Activities ....................................................................................... 3  
  2.3  Abandoned UST Removal ....................................................................................... 4  
  2.4  Soil Boring Investigation ....................................................................................... 4  
  2.5  Soil Sample Collection and Testing .................................................................... 4  
  2.6  Groundwater Monitoring Well Installation, Sampling and Testing ....................... 5  
  2.7  Supply Well Sampling .......................................................................................... 5  
  2.8  Data Validation and Reporting ............................................................................. 6  
  2.9  CCRPC Meeting .................................................................................................... 6  
3.0  ORGANIZATION AND STAFFING ........................................................................ 6  
4.0  PROJECT SCHEDULE .............................................................................................. 6  
5.0  MBE/WBE FAIR SHARE INFORMATION .................................................................. 6  
6.0  REFERENCES ........................................................................................................... 6  

Appendices

Appendix A – Site Location Map  
Appendix B – Proposed Phase II ESA Site Map
1.0 INTRODUCTION AND BACKGROUND

LE Environmental (LEE) of Waterbury, Vermont has prepared this work plan for a Brownfields Phase II Environmental Site Assessment (Phase II ESA) at the Pigeon Property, 1705 Route 128, Westford, Vermont (Site). This work plan was prepared for the Chittenden County Regional Planning Commission (CCRPC) following a request on November 6, 2019. This work is supported by the US Environmental Protection Agency (USEPA), the CCRPC, and the nineteen member municipalities in Chittenden County. CCRPC is funding this work via EPA Brownfields Assessment Grant # BF-BF00A00483. A Site location map is included in Appendix A.

LEE completed a Phase I ESA in September 2019. The property includes a vacant residence and a former bus garage on approximately 3.3 acres of land, on the north side of Route 128, in the center of Westford. The buildings are currently unoccupied and are used for storage.

The Site was developed prior to 1858. Historic Site use has included residential, with a gasoline filling station, and automotive and bus repair. A small store was also once present on the southeastern portion of the property. A building was noted on or near the northeastern property line on historic (1869 and 1915) maps. The building was gone by 1948.

The residence is heated with fuel oil. The garage is not currently heated but appears to have been heated with wood, propane, and/or fuel oil historically. The buildings are served by a private dug supply well and at least one septic system. The configuration and location of the septic system is not known.

Several small quantity containers of petroleum products and/or hazardous substances were noted on the Site. A 55-gallon drum of motor oil, a 5-gallon bucket of an unknown oily substance, a corroded and unlabeled 55-gallon drum with an unknown substance, a 5-gallon bucket of hydraulic oil, and an empty 55 gallon drum in poor condition were noted on the property. A weathered petroleum odor was noted in a wooded area to the north of the garage. A broken lawnmower and heavy vegetation was noted in the general vicinity of the odor. Some staining was noted on the garage floor. No significant cracks were noted in the vicinity of the stains. Pieces of metal, bus parts, lawnmowers, and tires were noted in the wooded portions of the property and on the north side of the garage.

No floor drains or hydraulic lifts were noted in the buildings. There is a stormdrain network under the common, which drains via an outlet pipe beneath Route 128 and below the property, daylighting on the southern end of the ravine. No odors or sheens were noted on the water exiting the outlet pipe.

A geophysical investigation performed at the Site revealed the possible presence of a underground storage tank (UST) and several smaller buried metal objects. The
owner has since confirmed the presence of a UST in front of the garage on the southern portion of the Site.

A tannery was present on the adjoining property to the west (in the presumed upgradient direction with respect to groundwater flow) on a historic 1869 map. It is unknown how long the tannery operated.

LEE identified three Recognized Environmental Conditions (RECs) during the Phase I ESA:

1. Historic use of the property for bus/automotive repair and as a gasoline filling station.
2. Possible presence of an abandoned UST.
3. Historic adjoining property use as a tannery.

A Phase II ESA was recommended to determine whether contamination is present on the property due to the identified RECs.

2.0 PROPOSED WORK SCOPE

LEE will perform a Phase II ESA on the Site to address the RECs identified in the Phase I ESA report. The following work scope tasks will be performed.

1. Site-Specific Quality Assurance Project Plan Addendum (SSQAPP Addendum)
2. Removal of the abandoned UST in order to sample underlying soils
3. Soil boring advancement and groundwater monitoring well installation
4. Collection and testing of soil samples for soil contaminants of concern
5. Sampling and testing of groundwater monitoring wells for groundwater contaminants of concern
6. Sampling and testing of drinking water for contaminants of concern
7. Data validation and preparation of a summary report
8. Meeting with CCRPC to present findings and conclusions

2.1 SSQAPP Addendum

LEE will prepare a SSQAPP addendum for approval by the DEC and USEPA Region 1. The SSQAPP addendum will compliment LEE’s approved generic QAPP document (RFA 19093). The SSQAPP addendum will be submitted to USEPA and DEC and LEE will respond to any comments made during review.

2.2 Pre-Excavation Activities

Prior to the initiation of subsurface activities, LEE will premark the proposed soil boring locations and obtain a Dig-Safe number. A site specific Health and Safety Plan

November 20, 2019
will be developed and reviewed by field staff prior to exploratory work. The Town of Westford will be contacted to discuss the work scope and any potential utility conflicts.

2.3 Abandoned UST Removal

The geophysical investigation revealed the possible presence of a UST in front of the garage. The presence of this UST was confirmed by the owner. The UST is believed to be a 500-gallon capacity gasoline UST. A test pit investigation will be conducted at the Site to investigate the possible USTs. An environmental assessment of subsurface conditions in the vicinity of (above, beside and below) the UST will be performed. This will require that the UST be removed, properly cleaned, and disposed of.

Soil samples will be collected above, below, and on the sides of the UST for screening of Volatile Organic Contaminants (VOCs) with a photoionization detector (PID) in accordance with the Vermont Department of Environmental Conservation (DEC) UST Section Closure Guidelines. A qualified excavating subcontractor will uncover, clean, and dispose of the existing UST.

One soil sample and one duplicate sample will be collected beneath the presumed gasoline UST and it will be submitted for laboratory analysis of the following constituents:

- VOCs via EPA Method 8260c;
- Polycyclic aromatic hydrocarbons (PAHs) via EPA Method 8270d; and,
- RCRA 8 Metals via EPA Method 6020.

Samples will be submitted to Eastern Analytical Laboratories of Concord, New Hampshire (EAI) for analysis.

2.4 Soil Boring Investigation

LEE proposes to conduct a soil boring investigation to evaluate the Site’s soil and groundwater quality. A truck-mounted geoprobe drill rig will be utilized to advance seven soil borings at the locations as shown on the Phase II ESA Site Map in Appendix B. The borings will be advanced to approximately 15 feet below grade.

2.5 Soil Sample Collection and Testing

Continuous soil sampling will be conducted during soil boring advancement. Soil samples will be screened for VOCs using a calibrated photoionization device (PID). One soil sample from each boring will be collected for laboratory analysis of soil COCs including the following constituents and a duplicate will be collected (total of eight samples):
• VOCs via EPA Method 8260c
• PAHs via EPA Method 8270d
• RCRA 8 Metals via EPA Method 6020
• Polychlorinated biphenyl compounds (PCBs) via EPA Method 8082

Samples will be submitted to EAI for analysis. The samples will be collected from the soil horizon exhibiting the greatest degree of contamination in the field as evidenced by PID reading, staining, or odor. If there is no indication of contamination, then the soil sample will be collected from 0-1.5’ bg to gauge surface soil conditions.

2.6 Groundwater Monitoring Well Installation, Sampling and Testing

Groundwater monitoring wells will be installed and groundwater testing will be conducted. LEE plans to install groundwater monitoring wells in five of the proposed soil boring locations. A 1” diameter PVC groundwater monitoring well will be installed in the soil borings. Each well will have up to a 10’ well screen spanning the water table. Each well will be developed following its installation with a peristaltic pump. The locations of the monitoring wells will be measured/surveyed and incorporated into a site plan.

Approximately one week after well installation, LEE will collect groundwater samples using low-flow sampling techniques. Prior to groundwater sample collection, depth to water and depth to product (if present) will be measured in from the top of casing reference point. These data will be used to calculate the water level elevations and to determine the groundwater flow direction and horizontal gradient beneath the site.

Groundwater samples will be collected from the monitoring wells using a peristaltic pump. Purge water will be disposed of on site. Purging will take place at 200 milliliters per minute or less until stabilization of pH, conductivity, turbidity and temperature have taken place, or one hour, whichever comes first. All samples will be analyzed for VOCs via EPA Method 8260c and RCRA 8 metals via EPA Method 6020. A duplicate sample will be tested for VOCs and metals and a trip blank will be collected and analyzed for VOCs. Samples will be submitted to EAI for analysis.

2.7 Supply Well Sampling

LEE will obtain a drinking water sample from the supply well. The collection point will be the residence’s kitchen. The sample will be analyzed by EAI for VOCs via EPA Method 524.2.
2.8 Data Validation and Reporting

Following receipt of analytical data, LEE’s quality assurance officer will validate the data according to the site-specific QAPP and LEE’s generic QAPP procedures. A Brownfields Phase II ESA Report will be prepared for review and approval. A UST Removal Report will also be prepared, and will be added to the Phase II ESA Report. The reporting format specified in the July 2019 DEC I-Rule will be followed. A description of the methodologies and results will be included. Comparison with appropriate environmental and materials quality standards will be made. The report will also contain: a site map, sampling locations map, groundwater contour and contamination maps, conceptual site model, laboratory analytical data, recommendations for additional work if necessary, conclusions, and other recommendations, as applicable.

2.9 CCRPC Meeting

LEE will attend one meeting at CCRPC offices during or after the work is completed to present the findings and conclusions.

3.0 ORGANIZATION AND STAFFING

Angela Emerson of LEE will manage the project including coordination, communications, procurement of supplies, equipment and subcontractor services, and performance of scheduled tasks. Alan Liptak of LEE will serve as the project reviewer and quality assurance officer and will review documents and perform data validation.

4.0 PROJECT SCHEDULE

The work can take place following approval of this work plan by CCRPC. The work will take approximately 14 weeks to complete. This includes the required 4-week EPA QAPP approval period, 6 weeks to perform the fieldwork, 2 weeks for laboratory data generation, and 2 weeks for reporting and validation.

5.0 MBE/WBE FAIR SHARE INFORMATION

LEE is not a MBE/WBE nor are its subcontractors on this project.

6.0 REFERENCES

Appendix A

Site Location Map
Appendix B

Proposed Phase II ESA Site Map
Map created using ANR's Natural Resources Atlas

NOTES
Map created using ANR's Natural Resources Atlas

DISCLAIMER: This map is for general reference only. Data layers that appear on this map may or may not be accurate, current, or otherwise reliable. ANR and the State of Vermont make no representations of any kind, including but not limited to, the warranties of merchantability, or fitness for a particular use, nor are any such warranties to be implied with respect to the data on this map.

September 9, 2019

1: 1,021

WGS_1984_Web_Mercator_Auxiliary_Sphere
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THIS MAP IS NOT TO BE USED FOR NAVIGATION