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April 20, 2022

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

RE: Proposal for PCB Inventory and Indoor Air Testing;
Pigeon Property, 1705 Route 128, Westford, Vermont

Dear Dan,

LEE is pleased to present this proposal for conducting an inventory of PCB-containing building materials, and for PCB air sampling and testing, at the Pigeon Property, 1705 Route 128 in Westford, Vermont. The proposed work scope and pricing are presented below. This work scope is for the existing residential structure. The existing garage is not included since the current redevelopment scenarios include its removal prior to redevelopment.

PCB Building Materials Inventory

Prior to the initiation of sampling activities, LEE will perform an inventory of potential PCB-containing building materials. The inventory will be performed using current guidance and forms for non-school buildings provided by the Vermont Department of Environmental Conservation (DEC).

DEC Indoor Air Sampling Plan and SSQAPP Addendum

Following completion of the inventory, LEE will prepare a combined DEC Indoor Air Sampling Plan and EPA Site-Specific Quality Assurance Project Plan (SSQAPP) addendum for approval by the DEC and USEPA Region 1. The Sampling Plan/SSQAPP addendum will compliment LEE's approved generic QAPP document (RFA 19093). The Sampling Plan/SSQAPP addendum will be submitted to USEPA and DEC for review, and LEE will respond to any comments made during review. This document will be prepared using current guidance for non-school buildings provided by DEC and will include the number of proposed samples, proposed sampling locations, sampling and testing methodology, and other information as required.



Indoor Air Sampling and Testing

Following regulatory approval, LEE will perform the indoor air testing. The current sampling and testing assumptions are based on our current knowledge of the building, and a telephone conversation with Kimberly Caldwell at the DEC on April 18, 2022. These include:

1. Four indoor air samples will be collected via EPA Method TO-10A for a 24-hour period at a maximum air flow rate of 5 liters per minute. The specific sampling locations will be determined following completion of the inventory.
2. One duplicate indoor air sample, one outdoor ambient air sample, and one field blank will also be collected / generated during the sampling.
3. Pace Analytical Laboratory of East Longmeadow, MA will analyze a total of six pumped samples and one field blank for PCBs via EPA Method 8082 with Soxhlet extraction via EPA Method 3540C.

Data Validation and Reporting

Following receipt of analytical data, LEE’s quality assurance officer will validate the data according to the SSQAPP addendum and LEE’s generic QAPP procedures. A Brownfields Indoor Air Sampling and Testing Report will be prepared for review and approval. A description of the methodologies and results will be included. The PCB data will be compared to the current DEC release reporting threshold of 22.5 nanograms per cubic meter. If DEC issues additional guidance on acceptable indoor air concentrations for non-school structures prior to reporting then the data would be compared with those as well. The report will also contain: a site map, sampling locations map, laboratory analytical data, recommendations for additional work if necessary, conclusions, and other recommendations, as applicable.

Pricing

LEE will perform the PCB inventory and indoor air sampling on a time and materials basis, which includes all labor, equipment, and expenses for an estimated total price of \$6,480. A task breakdown is included below:

| Task | Cost |
|---|----------|
| PCB Building Materials Inventory | \$ 470 |
| DEC Indoor Air Sampling Plan and SSQAPP Preparation | \$ 1,140 |
| Indoor Air Sampling and Testing | \$ 3,070 |
| Data Validation and Report Preparation | \$ 1,800 |

This pricing is provided subject to the following assumptions:

- EPA/DEC approves the work as written.
- Free and easy site access.



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- Electricity is available at the building upon arrival for sampling.
- 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,

A handwritten signature in black ink that reads "Angela Emerson". The signature is written in a cursive, flowing style.

Angela Emerson, PG, EP
Senior Geologist

LEE # 19-138