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PHASE I ENVIRONMENTAL SITE ASSESSMENT
141 DANBURY ROAD
WILTON, CONNECTICUT

April 2021
File No. 05.0046756.00

PREPARED FOR:
Fuller Development, LLC
South Norwalk, Connecticut

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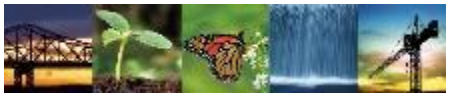

April 29, 2021
File No. 05.0046756.00

Mr. Samuel Fuller, President
Fuller Development, LLC
1 North Water Street, Suite 100
South Norwalk, CT 06854

Re: Phase I Environmental Site Assessment
141 Danbury Road, Wilton, Connecticut

Dear Mr. Fuller,

Pursuant to our proposal dated February 1, 2021, GZA is pleased to submit the attached Phase I Environmental Site Assessment Report for the above-referenced target property ("Site"). GZA completed this Phase I Environmental Site Assessment in general conformance with the guidelines described in ASTM International's Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process - E1527-13 and with the Connecticut Department of Energy and Environmental Protection (CTDEEP) Site Characterization Guidance Document (SCGD, rev 12/2010).

We hope this satisfies your present needs. If you need additional information, please contact Mr. Adam Henry at (860) 965-1081.

Very truly yours,
GZA GEOENVIRONMENTAL, INC.

Anthony Trani
Assistant Project Manager

Adam T. Henry, LEP
Associate Principal/Environmental Professional

Kathleen A. Cyr, LEP
Consultant/Reviewer

Attachment: Phase I ESA Report

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EXECUTIVE SUMMARY

Fuller Development, LLC (also referred to herein as "Client" or "User") retained GZA GeoEnvironmental, Inc. (GZA) to perform a Phase I Environmental Site Assessment (ESA) of the property located at 141 Danbury Road in Wilton, Connecticut (hereafter referred to as the "Site"). GZA performed this Phase I ESA as part of the Client's due diligence for the Site.

This Phase I ESA was performed in general conformance with the scope and limitations of ASTM International's Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process – E1527-13 (ASTM E1527-13) and with the Connecticut Department of Energy and Environmental Protection (CTDEEP) Site Characterization Guidance Document (SCGD, rev 12/2010). The Phase I ESA included our visual observation of the site; a review of historical information, environmental databases, and information provided by the User; and interviews with current Site representative(s). Limiting conditions and/or deviations from ASTM E1527-13 are described in Sections 1.4 and 6.0 of this Phase I ESA Report. GZA prepared this Phase I ESA Report in conformance with the limitations presented in Section 14.0 and with the terms and conditions of our proposal to Fuller Development, LLC, which are included in Appendix A.

The Site consists of an approximately 4.3-acre parcel of commercial land that is improved with a one and two-story, approximately 47,000-square foot (gross area) building, constructed around 1965, and has been occupied by the headquarters (office space) for Melissa & Doug, a maker of toys, since around 2006. At the time of GZA's 2021 Site reconnaissance, Melissa & Doug were in the process of moving out.

Prior to the construction of the eastern half of the current building around 1965, the Site appears to have been farmland and contained several small buildings. From the mid-1960s until around 2006, occupants of the Site included: Angelique and Company, Inc. (1964; perfume manufacturer); Electronics Control, Inc. (1964-1969), T-Bar, Inc. (1972-1988), and Data Switch Inc. (1989-1989) (three electronics manufacturers); Surgical Dynamics (1992-1999) and US Surgical (2010). Reportedly, the electronic manufacturers conducted vapor and dip degreasing and by 1992, the building was used for office purposes only. A former septic system with two drywells was used until 1978 when the Site was connected to the municipal sewer system. An onsite well was utilized for drinking water until 1990 when the Site was connected to the municipal water supply.

Based on the findings of our Phase I ESA and on our professional judgment, GZA has identified the following in connection with the Site:

Recognized Environmental Conditions (REC)/Areas of Concern (AOC)

This Phase I ESA revealed evidence of the following AOCs, some of which are also RECs, in connection with the Site:

- AOC-1 Exterior Doors– According to a 2006 Environmental Condition Assessment Form (ECAF), low concentration of certain polyaromatic hydrocarbons (PAHs) and/or extractable total petroleum hydrocarbons (ETPH) were detected in shallow soil samples collected adjacent to exterior doors of the building that may have been near the former manufacturing areas.

- AOC-2 Loading Dock – A loading dock is located on the southeast side of the building.

- AOC-3 Sub-Floor Conditions - According to the 2006 ECAF, low concentration of certain PAHs and/or ETPH were detected in shallow soil samples collected beneath the floor of the building and certain volatile organic compounds (VOCs) were detected in soil vapor samples collected beneath the building.

- AOC-4 Former 4,000-gallon Underground Storage Tank (UST) – A 4,000-gallon heating oil UST was removed from the Site in 1999. Low concentrations of total petroleum hydrocarbons (TPH) were detected in two soil samples collected from the bottom of the tank grave when it was removed. According to the 2006 ECAF, low concentration of certain PAHs and/or ETPH were detected in soil samples collected from the former tank grave in 2006.

- AOC-5 Former Septic System and Drywell – A septic system was used at the Site prior to 1978. According to the 2006 ECAF, the septic tank and some soil were removed in 1990, and a low concentration of ETPH was detected in a soil sample collected from the former septic system area in 2006.

- AOC-6 Concrete Pads – Two concrete pads, one used for an emergency generator and one for a transformer, are located to the north of the building. According to the 2006 ECAF, low concentration of certain PAHs and/or ETPH were detected in soil samples collected in 2006 from around the concrete pad for the emergency generator, and low concentrations of polychlorinated biphenyls (PCBs) were detected in soil samples from around the transformer.

Controlled Recognized Environmental Conditions (CREC)

- This Phase I ESA revealed no evidence of CRECs in connection with the Site.

Historic Recognized Environmental Conditions (HREC)

- This Phase I ESA revealed no evidence of HRECs in connection with the Site.

De Minimis Conditions

This Phase I ESA revealed no evidence of *de minimis* conditions in connection with the Site.

Data Gaps and Their Significance

- Past owners were not interviewed as part of this assessment. However, it is unlikely that the past owners would provide information not obtained from other sources. It is GZA's opinion that this is not a significant data gap.

Non-ASTM E1527-13 Considerations

This Phase I ESA does not include an evaluation of environmental issues or conditions that ASTM E1527-13 stipulates as non-scope considerations with the exception of limited sampling of building caulk for polychlorinated biphenyls (PCBs). A total of six samples of caulk were collected and submitted for analysis for PCBs; no PCBs were detected.

Transfer Act Establishment Opinion

Based on GZA's review of information discussed in this report, the Site meets the definition of an "establishment" under the Connecticut Transfer Act because more than 100 kg of hazardous waste was generated at the Site in one month. Records indicate between 500 and 6,000 pounds of hazardous waste were shipped offsite between 1981 to 1984 by T-Bar, Inc. (a former tenant at the Site).

A determination as to whether a transaction is subject to the Connecticut Transfer Act is a legal one and advice of environmental council should be obtained.

1.0 INTRODUCTION

This Phase I Environmental Site Assessment (Phase I ESA) presents the field observations, results, and opinions of a Phase I ESA by GZA GeoEnvironmental, Inc. (GZA) for Fuller Development, LLC (also referred to herein as "Client" or "User") at property identified at 141 Danbury Road, Wilton, Connecticut (hereafter referred to as the "Site"). GZA prepared this Phase I ESA Report in conformance with the limitations presented in Section 14.0 and with the terms and conditions of our proposal dated February 1, 2021, which are included in Appendix A. This Phase I ESA Report is subject to modification if GZA or other party develops subsequent information.

1.1 REASON FOR PERFORMING THE PHASE I ENVIRONMENTAL SITE ASSESSMENT

GZA understands that this Phase I ESA was requested as part of environmental due diligence prior to potential acquisition of the Site. We understand that this Phase I ESA is not funded with a federal grant under the US Environmental Protection Agency (EPA) Brownfield Assessment and Characterization Program or the US Small Business Administration, and that an evaluation of controlled substances at the Site is not required.

1.2 PROJECT OBJECTIVES

We designed the Phase I ESA Scope of Services described below in conformance with ASTM International's Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process – E1527-13 (ASTM E1527-13) and with the Connecticut Department of Energy and Environmental Protection (CTDEEP) Site Characterization Guidance Document (SCGD, rev 12/2010). The objectives of this Phase I ESA were:

- To render an opinion as to whether surficial or historical evidence indicates the presence of recognized environmental conditions (RECs) that could result in the presence of hazardous substances or petroleum products in the environment, as defined in ASTM E1527-13;
- To identify potential Areas of Concern (AOCs) as defined by the Connecticut Department of Energy and Environmental Protection's (CTDEEP) Site Characterization Guidance Document (SCGD; 2010); and
- To permit the User of this Phase I ESA to satisfy one of the requirements for qualifying for certain Landowner Liability Protections under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA).

1.3 DEFINITIONS

As defined in ASTM E1527-13:

- A REC indicates "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment."
- The term "Controlled REC" (CREC) applies to a site that has reached regulatory closure with the implementation of an engineering control, such as an impermeable cap, and/or an institutional control, such as a deed restriction or property use restriction.

- A "historic recognized environmental condition" (HREC) is "a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, activity and use limitations, institutional controls, or engineering controls.)" A HREC typically is not a REC. However, if regulatory standards have changed since the HREC achieved closure, and the data used to close the case indicate the occurrence of chemical constituents that are above their respective regulatory standard(s), then we will identify the HREC as a REC in the conclusions Section of this Phase I ESA Report.

- A "*de minimis*" condition, as defined by ASTM E1527-13, is "a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies." ASTM E1527-13 does not consider *de minimis* conditions to be RECs.

- A data gap refers to a lack of or inability to obtain information required by this practice despite good faith efforts by the environmental professional to gather such information. Data gaps may result from incompleteness in any of the activities required by this practice. A data gap is only significant if other information and/or professional experience raises reasonable concerns involving the data gap.

- An AOC or Area of Concern, as defined in the CTDEEP Site Characterization Guidance Document, is a location or area at a site where hazardous waste and/or hazardous substances (including petroleum products) have been or may have been used, stored, treated, handled, disposed, spilled and/or released to the environment.

1.4 SCOPE OF SERVICES

GZA's Scope of Services consisted of the following activities:

- A review of federal and State regulatory agency databases for the Site and the minimum search distance from the Site;
- Contact with certain local regulatory agencies to inquire about environmental conditions at the Site and in its vicinity;
- A review of the Site history through available Standard Historical Sources;
- A review of previous environmental reports;
- A Site reconnaissance to observe current Site conditions for evidence of recognized environmental conditions;
- The completion of a reconnaissance of the Site vicinity;
- A review of adjoining properties to identify the use of hazardous substances or petroleum products;
- Interview(s) with the key site manager, as well as certain other available occupants and major tenants, regarding the current and past Site usage and facility operations;
- Collection of caulk for the analysis of polychlorinated biphenyls (PCBs); and
- The preparation of this Phase I ESA Report of our findings.

Deviations of this Phase I ESA from ASTM E1527-13 include:

- Past owners were not interviewed as part of this assessment. However, it is unlikely that the past owners would provide information not obtained from other sources. Therefore, in GZA's opinion, this is not a significant data gap.

This Phase I ESA does not include an evaluation of environmental issues or conditions that ASTM E1527-13 considers non-scope considerations, except for sampling building caulk for PCBs which is discussed further in Section 10.0.

In addition, it should be noted that, while ASTM E1527-13 includes an evaluation of the potential migration of vapors in the subsurface that originate from hazardous substances or petroleum products, it does not require Vapor Encroachment Screening as defined in ASTM guidance E2600.

2.0 DESCRIPTION OF SITE AND VICINITY

GZA obtained the following information resulting from its Site reconnaissance, its research, and from interviews with people knowledgeable about the Site. Photographs depicting Site conditions during GZA's reconnaissance are presented in Appendix B.

2.1 SITE LOCATION

The Site is situated on the west side of Danbury Road and is located in a primarily commercial and residential section of Wilton, Connecticut. The Norwalk River flows south along the Site's western border.

2.2 DESCRIPTIONS OF SITE AND BUILDINGS

The Site consists of a 4.3-acre parcel of commercial land that is improved with a two-story, approximately 47,000-square foot (gross area) building, constructed in 1965, and approximately 35,000 square feet of asphalt paving. The layout of the Site is shown on Figure 2.

Information regarding the Site building is provided in the tables below.

Feature	Description
Year of Construction	1965 (Assessor's Property Card)
Square Footage	Approximately 33,600 square feet (footprint), 47,000 square feet gross area (Assessor's Property Card)
# Stories/Basement	2 stories, slab on grade
Heating/Cooling Systems	Forced Air/ Central Air
Elevators	One
Other Relevant Building Features	None

The following entities provide utilities to the Site:

Service	Provider
Electricity	Eversource Energy
Natural Gas	Yankee Gas
Drinking Water	Aquarion Water Company
Sanitary Sewer Services	Wilton Water Pollution Control Authority (WPCA)
Other Services	Not applicable

2.3 CURRENT SITE USE

At the time of GZA's visit, the Site was the headquarters (office space) for Melissa & Doug, a maker of toys. Melissa & Doug were in the process of moving out of the building.

2.4 ADJOINING PROPERTIES

The following table lists the properties that adjoin the Site and describes their current use.

Direction	Street Address/Location	Name (as applicable) and Current Use
North	149 Danbury Road 159 Danbury Road	Rings End Lumber, estimating and design services State of Connecticut
South	131 Danbury Road	Offices- Tracy Locke, Enterprise Car Rental, and Alcone
East	46 Lambert Common	Condominiums
West	Norwalk River	Undeveloped land, river

GZA did not observe direct evidence of the use or storage of hazardous chemicals or petroleum products at adjoining properties from public roadways. GZA notes that hazardous chemicals or petroleum products (such as heating fuel or other hazardous household substances) may be stored or used at these properties in a manner not apparent from public thoroughfares.

2.5 VICINITY PROPERTIES

As part of this Phase I ESA, GZA performed a reconnaissance from public properties of the Site vicinity within 1/4-mile of the Site. The Site vicinity is occupied by a mixture of commercial/residential buildings.

3.0 ENVIRONMENTAL SETTING

Section 3.0 provides information regarding the general physiographic, hydrogeologic, hydrologic, and soil conditions in the area of the Site.

3.1 REGIONAL PHYSIOGRAPHY

Based on a review of the U.S. Geological Survey topographic map for Wilton, Connecticut (1997), the Site slopes down to the west and is at an approximate elevation of 150 feet above mean sea level. The topographic gradient near the Site slopes gently to the west.

3.2 GEOLOGIC, HYDROGEOLOGIC, AND HYDROLOGIC CONDITIONS

According to bedrock geology data provided by United States Geological Survey (USGS), bedrock in the Site area consists of Ordovician Granitic Gneiss. Ordovician Granitic Gneiss is described as a “light-colored, foliated granitic gneiss”. According to Connecticut Environmental Conditions Online (CTECO), the surficial materials over the majority of the Site are classified as sand and gravel with smaller portions of alluvial sand and gravel to the west nearer to the Norwalk River.

According to soil data provided by US Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS) Web Soil Survey, soils at the Site consist of Urban land and Rippowam Fine Sandy Loam.

The inferred direction of groundwater flow at the Site is westerly towards the Norwalk River. However, localized flow direction in the area of the Site may vary as a result of underground utilities, septic systems, or heterogeneous subsurface conditions. Subsequent references to upgradient and downgradient properties are based on the inferred westerly groundwater flow direction.

According to CTECO, the CTDEEP has classified groundwater beneath the Site and in the vicinity as Class "GA." According to the CTDEEP Water Quality Standards (October 2013), Class "GA" groundwater is described as "groundwater within the area of existing private water supply wells or an area with the potential to provide water to public or private water supply wells. The Department presumes that groundwater in such area is, at a minimum, suitable for drinking or other domestic purposes".

The nearest surface water body to the Site is the Norwalk River, which abuts the Site to the west. According to CTECO, CTDEEP considers the adjacent reach of the Norwalk River to be a Class B surface water. Designated uses for Class B surface waters include habitat for fish and other aquatic life and wildlife; recreation; navigation; and industrial and agricultural water supply.

4.0 HISTORICAL USE INFORMATION

The Site history was developed from "Standard Historical Sources" as defined in ASTM E1527-13, available files at the Town of Wilton and interviews with knowledgeable parties. A summary of the Site and area history is provided in Section 4.1. Specific information obtained from standard historical sources is contained in following subsections, and Appendix C includes copies of relevant historical documents.

4.1 SITE AND AREA HISTORY SUMMARY

Prior to the 1960s, the Site appears to have been farmland and contained buildings. By the 1960s, the buildings at the Site had been demolished and the Site was redeveloped with the eastern half of the current building. By the 1990s, a major addition occurred when the western half of the building was constructed. At the time of GZA's 2021 Site reconnaissance, the Site building was occupied by Melissa & Doug who were in the process of moving out.

Properties surrounding the Site have primarily been a mix of commercial and industrial properties along Danbury Road with some residences.

4.2 AERIAL PHOTOGRAPH REVIEW

GZA consulted historical aerial photographs provided for online review by the UConn Map and Geographic Information Center (MAGIC). The table below contains GZA's description of the Site and vicinity properties as shown in the aerial photographs.

Year	Description of Site	Description of Vicinity
1934 and 1951	The Site appears to be farmland with three buildings on the eastern half. A stream appears to flow through the middle of the Site and the Norwalk River is present along the western	The Site vicinity appears to consist of farmland and residential properties. By 1951 the areas north, east, and south of the Site

Year	Description of Site	Description of Vicinity
	boundary. By 1951, the farmland appears to be reverting to forested land.	have additional residential development and the farmland appears to be decreasing.
1970	The three buildings are no longer present, and the Site appears to be developed with a building along Danbury Road and the area to the south of the building is paved. This building appears similar to the eastern portion of the current building.	The Site vicinity appears mainly residential with a few commercial properties west and south of the Site along Danbury Road. There is a large pond present west of the Site.
1990, 1995, 2006, and 2010	The Site appears similar to 1970 except a major addition on the western side of the building is present and the asphalt parking lot extends to the Norwalk River.	The Site vicinity appears mixed-use commercial and residential.

4.3 FIRE INSURANCE MAPS

GZA requested historical fire insurance maps (Sanborn Maps) from EDR. According to EDR, the complete Sanborn library was searched and there was no Sanborn coverage for the Site. A letter indicating the lack of coverage from EDR is provided in Appendix C.

4.4 PROPERTY TAX FILES

GZA reviewed property Assessor's Card available online from the Town of Wilton Assessor's office. Records indicate that the current owner of the Site is Fab 5, LLC, which acquired the property on August 6, 2007. According to the Assessor's card, the Site consists of a 3.2-acre parcel with a building that is 47,070 square feet (gross area) which was constructed circa 1965 and is served by public water and sewer and heated with natural gas. Note that according to a survey provided by the Client, the Site is approximately 4.3 acres.

A copy of the Assessor's property card for the Site is included in Appendix C.

4.5 RECORDED LAND TITLE RECORDS

Based upon our review of the ALTA Commitment for Title Insurance by First American Title (provided by the Client a copy of which is provided in Appendix E), no environmental liens, Activity and Use Limitations (AUL) or other institutional or engineering controls associated with the Site were reported.

4.6 HISTORICAL USGS TOPOGRAPHIC MAPS

GZA reviewed historical USGS topographic maps provided by Nationwide Environmental Title Research, LLC (NETR) Online. The table below contains GZA's description of the Site and vicinity properties as shown on the historical topographic maps.

Year	Description of Site	Description of Vicinity
1892, 1903, 1912, 1924, 1937	The Site appears undeveloped. The Norwalk River abuts the Site to the west.	Danbury Road appears developed and there are some residences along Danbury Road.

Year	Description of Site	Description of Vicinity
1947	The Site appears similar to 1937 except wetlands are depicted through the middle of the Site and the Norwalk River is not shown.	The Site vicinity is similar to 1937.
1952, 1961, 1967	A building appears to be present at the Site along Danbury Road. The Norwalk River abuts the Site to the west.	Similar to 1947, except some of the buildings shown may be commercial.
1973 and 1989	The eastern portion of the Site building is shown.	Similar to 1967.
2012, 2015, and 2018	No details of the Site are shown.	No details of the Site vicinity are shown.

4.7 CITY DIRECTORIES

GZA reviewed an EDR City Directory Image Report dated March 22, 2021. City directories for select years between 1960 and 2017 were provided in the EDR report. The following table lists the city directory results for the Site. Based on other records reviewed (Section 7.5), the Site appears to have historically had the address of 139 Danbury Road. Copies of the city directories provided by EDR are included in Appendix C.

Year(s)	Listings for Site
1960	141 Danbury Road address not listed, Angelique & Co Inc., perfume manufacturers, listed at 139 Danbury Road
1965	141 Danbury Road address not listed, Electronics Controls, Inc. listed at 139 Danbury Road
1972	141 Danbury Road address not listed, T-Bar Inc, electronics manufacturer, listed at 139 Danbury Road
1976	T-Bar Inc
1992	Data Switch Corp
1995	Address not listed
2000	Surgical Dynamics Incorporated
2005	Address not listed
2010	United States Surgical Corp.
2014	Gummy Lump, LLC, Melissa & Doug
2017	Melissa & Doug

Properties adjoining the Site along Danbury Road have historically been a mix of commercial and industrial occupants.

4.8 BUILDING DEPARTMENT RECORDS

GZA requested historical building permit records for the Site, maintained in the Town of Wilton Building Department. Building department staff provided GZA with digital documents for the Site (Appendix C) which

included records from the Fire Marshal's office. Based upon GZAs review the following pertinent records were reviewed:

- Building permit (No. 3752) to construct a 100 by 200-foot building for an electronics laboratory, October 31, 1962.
- Building permit (No. 4093) to construct an approximately 35 by 12-foot addition for a sprinkler system storage tank, November 21, 1963.
- Certificate of Occupancy (permit number 8485) for a building addition, July 11, 1977
- Inspection request for the removal of "gas tanks", March 25, 1991. GZA notes the Site was reportedly connected to natural gas in 1991 and this inspection form may be related to the natural gas connection since there are no records of gasoline tanks at the Site based on other historical information.
- Tables and boring logs from an Environmental Impact Investigation, GZA, August 1992. According to the boring logs, eleven borings were advanced, five monitoring wells were installed at the Site, and a soil gas survey was conducted. According to the tables, freon and chlorinated volatile organic compounds (VOCs) were detected in soil gas samples and VOCs were also reported in select soil samples. VOCs were also detected in groundwater.
- Tables from Groundwater Sampling Reports, GZA, February, August, and November 1994 and January 1995. The text from this report was not provided to GZA and figures were not legible. According to the 1995 tables, depth to groundwater ranged from approximately 3 to 12 feet and no VOCs were detected.
- Documents related to the removal of a 4,000-gallon fuel oil underground storage tank (UST) in January 1999 on behalf of US Surgical. Two soil samples were collected from the UST grave and contained total petroleum hydrocarbons (TPH) at 120 and 77 mg/kg. The UST was located on the north side of the building.
- Electrical permit application for the installation of a generator, December 26, 2012. The generator is shown on the north side of the building and has an integrated 2,500-gallon fuel tank.

4.9 OTHER LAND USE RECORDS

GZA requested information for the Site at the Town of Wilton Health Department. The Wilton Health Department provided records indicating a potable well and septic system were installed at the Site in 1963. The well is shown to be 80 feet from the septic system. The document indicates the potable well is on the northwest side of the building.

5.0 PREVIOUS SITE INVESTIGATIONS

The following was provided by the Site owner at the request of the Client:

Status Summary Memo, Leggette Brashears and Graham (LBG), September 13, 2012

According to this memo, three areas at the Site were assessed (transformer pad, shallow interior soil, and the former UST location). According to LBG, sampling was performed around the transformer pad in 2011 and PCBs were detected below applicable criteria and no further effort was needed. LBG collected one sample from an interior location where impacts were previously identified in 2006; reportedly the one sample collected did not contain constituents above applicable soil quality criteria. In 2006, impacts were identified at boring location TB-1 by the former 4,000-gallon heating oil UST. A supplemental investigation was apparently performed in 2011 and indicated soils around TB-1 were impacted (presumably with petroleum-related compounds, although not specified in the memo) above the Class GA-Pollutant Mobility Criteria (GA-PMC). LGB recommended several

options to comply including excavation of these soils, natural attenuation monitoring, and enhanced natural attenuation.

VOC and Formaldehyde Sampling Letter, RTK Environmental, December 2, 2019

According to this letter, 9 VOC and formaldehyde air samples were collected inside the building. According to the report, "normal" levels of VOCs and "moderate to elevated levels" of formaldehyde were reported inside the building.

Visual Inspection and Mold Sampling, RTK Environmental, December 2, 2019

According to this letter, RTK observed areas where roof leaks had occurred in the past and indicated the roof had been repaired. Water staining was reported in the front level storage room, front level loading dock/workroom, front level janitor's closet, and lower-level stairway. Several mold samples were also collected; the results from the janitor's closet were reported to be "unacceptable" while the results from other samples were reported to be "acceptable".

A topographic survey by D'Andrea Surveying & Engineering, P.C., dated April 22, 2021, indicates the Site is approximately 4.3 acres.

Copies of the survey and the previous reports provided by the owner are provided in Appendix E.

6.0 SITE RECONNAISSANCE

The purpose of GZA's Site reconnaissance was to observe current Site conditions for evidence of recognized environmental conditions that could result in the presence of hazardous substances or petroleum products in the environment at the Site. GZA Assistant Project Manager, Anthony Trani conducted a Site reconnaissance at the Site on March 25, 2021. GZA was accompanied by Mr. Tom Pajolek with CBRE, the real estate broker, and by an employee of Melissa & Doug during the Site reconnaissance. GZA documented its observations and photo-documented pertinent features and/or areas of environmental concern, which we reference in this Phase I ESA Report. Selected photographs are included in Appendix B, and Figure 2 - Site Layout, depicts pertinent Site features.

GZA observed the operations (office space) at the Site had ceased and Melissa & Doug were in the process of moving out of the building.

The following table discusses features of potential environmental concern that we identified at the Site.

Feature	Description
Aboveground storage tank (AST) systems	GZA observed an AST associated with the building elevator in the elevator room. The AST contained hydraulic oil used by the elevator. The AST appeared in good condition and GZA did not observe staining or note any petroleum odors. GZA also observed an AST containing diesel fuel below the onsite generator. The AST and generator were on top of a cement pad

Feature	Description
	and appeared to be in good condition; no surficial evidence of leaks was noted.
Underground storage tank (UST) systems	None observed. According to municipal records (Section 4.8), a 4,000-gallon heating fuel UST was removed from a location to the north of the building in 1999.
Chemical or petroleum storage or handling areas	GZA observed several cans of spray paint, and four 5-gallon canisters of gasoline in a cabinet on the loading dock. No staining or odors were observed.
Chemical waste or petroleum waste storage or handling areas	None observed.
Dumpsters	Two empty dumpsters were observed in the southern portion of the parking lot and a large roll-off dumpster was observed on the south side of the building by the loading dock. Melissa & Doug were in the process of moving out of the building and the large roll-off was for trash generated from the moveout. No staining was observed around the dumpsters.
Floor drains, trenches, sumps and associated piping	A floor drain was observed in the model shop. The model shop contained woodworking equipment and was used to make prototype toys. No chemicals were observed in the model shop and no chemicals were observed near the floor drain.
Oil/water separators	None observed.
Stormwater drains, grates and associated piping	None observed.
Drainage swales, culverts, impoundments, and surface water bodies	GZA observed the Norwalk River on the west side of the parking lot along the western property boundary.
Septic systems, leach fields, seepage pits, and dry wells	According to previous reports, a septic system was located to the north of the building.
Open pipe discharges	None observed.
Landfills and solid waste dumping	None observed.
Historical fill or other fill material	None observed.
Staining or stressed vegetation	None observed.
Electrical transformers or capacitors	GZA observed a transformer on the north side of the building next to the generator. A placard indicating PCB content was not observed. GZA did not observe staining or note any petroleum odors.
Hydraulic equipment, including lifts, elevators, and compactors	A hydraulic reservoir for an elevator was observed within the Site building.
Active or inactive production wells	GZA observed a four-foot round concrete cover in the ground on the north side of the building. GZA infers the cover to be related to a drinking water well that was reportedly formerly used at the Site.

Feature	Description
Monitoring wells, former boreholes, or other evidence of environmental investigations	GZA observed three monitoring wells at the Site.
Other observations potentially indicative of the presence of RECs	None observed.

7.0 REGULATORY DATABASE REVIEW

GZA developed the information in this section based on public information obtained from various federal, state, and local agencies that maintain environmental regulatory databases.

7.1 FEDERAL AND STATE ENVIRONMENTAL RECORD SOURCES

GZA obtained data from federal and state databases contained in a report dated March 18, 2021 provided by EDR, a professional data search company. The following table indicates the databases provided in EDR's database report, the minimum search distances from the Site utilized by GZA in evaluating that database, and the number of properties that appear on the database within the minimum search distances used. Descriptions of the federal and state databases and the dates that EDR accessed the federal and state databases are provided in EDR's report (see Appendix D).

Federal and State List	Approximate Minimum Search Distance*	Site and Adjoining Properties	# Sites Within Search Distance	# Potential Sites of Concern
NPL	*1 mile*	0	0	0
Delisted NPL	*½ mile*	0	0	0
SEMS	*½ mile*	0	0	0
SEMS ARCHIVE	*½ mile*	0	0	0
RCRIS CORRACTS	*1 mile*	0	0	0
RCRIS-TSD	*½ mile*	0	0	0
RCRIS-LQG/SQG	*Site and adjoining properties*	0	0	
Federal IC/EC Registries	*Site only*	0	0	
ERNS	*Site only*	0	0	
State Equivalent NPL (State Hazardous Waste Sites, SHWS)	*1 mile*	0	2	0
State Equivalent CERCLIS (Site Discovery and Assessment Database (SDADB)	*½ mile*	0	5	0
State Landfill and/or Solid Waste Disposal Site	*½ mile*	0	0	0
Leaking Underground Storage Tanks (LUSTs)	*½ mile*	0	5	0

Federal and State List	Approximate Minimum Search Distance*	Site and Adjoining Properties	# Sites Within Search Distance	# Potential Sites of Concern
Registered USTs	*Site and adjoining properties*	1-Site	3	
State IC/EC Registries	*Site only*	0	2	
Voluntary/Brownfield Cleanup Program Sites	*½ mile*	0	0	0
Other databases reviewed include: CTPROPERTY, SPILLS, RCRA NonGen, TRIS, TSCA, FTTS, SSTS, ICIS, PADS, MLTS, RADINFO, FINDS, RAATS, LWDS, MANIFEST, INDIAN RESERV, US AIRS, PRP, LEAD SMELTERS, and CPCS. Refer to the EDR Report in Appendix D for definitions of these databases and the radii searched.				

* The approximate minimum search distance indicates the minimum distance measured from the nearest Site boundary for which EDR performed the database review.

7.2 LISTINGS FOR SITE AND ADJOINING PROPERTIES

The Site was listed in the following federal or state databases provided by EDR: UST, FINDS, US AIRS, FINDS, ECHO, ASBESTOS, and CT PROPERTY. According to our review of EDR records, a 4,000-gallon fuel oil UST was removed from the Site in 1999. The Site also has a FINDS Registry ID number 110030406335 and 110001967328 and a US AIRS/ECHO ID number 1006558714; however, no further details are provided. According to the ASBESTOS file, Bestech Inc. of CT performed work at the Site in 2000; however no further details are provided. According to the CT PROPERTY file, in 2006 a Form III Connecticut Property Transfer Act filing was made for the Site. All 4 Kids, LLC is listed as the certifying party.

The Site was not listed in any other databases in the EDR Report.

7.3 LISTINGS FOR OTHER VICINITY PROPERTIES

131 Danbury Road (southern abutter - sidegradient) – According to EDR, this property, listed as Perkin-Elmer Corp., has had several form filings for the Connecticut Property Transfer Act. The most recent Form III filing was in 2018. EDR also had a record of a manifest for the disposal of 55 gallons of mercury and for a spill of No. 2 fuel oil from an inground tank failure in 2002. The tank was reportedly removed.

149 Danbury Road (northern abutter- sidegradient) – According to EDR, 1,051 gallons of D001-ignitable waste were shipped from this property in 1991.

To the extent reasonably practicable, GZA evaluated the type of each property listed in the EDR report, size of release (if any), and relative position to the Site based on the listed address location, and the inferred groundwater flow direction. Based on this evaluation, it does not appear that releases from properties listed in the EDR report have the potential to impact the Site. GZA notes that, based on a preliminary screening, releases from nearby properties do not likely represent a potential vapor encroachment condition (VEC).

7.4 EVALUATION OF UNMAPPED PROPERTIES

GZA also reviewed the list of "orphan" sites, which are properties with insufficient address information to allow the mapping software to plot a location. Based on the incomplete descriptions provided in the database summary, it does not appear the listed properties could impact the Site.

7.5 REGULATORY FILE REVIEW

GZA reviewed the Remediation Files for the Site at the CTDEEP on April 14, 2021 and conducted a review of available CTDEEP electronic records for the Site and selected properties identified in the EDR database report (see Section 7.2).

Based on review of the Site history and information presented in the EDR database report, GZA searched available CTDEEP electronic documents and databases, including the CTDEEP Document Online Search Portal, the 1984-2008 MANIFEST database, UST information available through CTDEEP's ezFile portal and CT Open Data UST database, the CTDEEP Spill Incident Tracking System (SITS, July 1996 to September 2020), GZA's in-house copy of the CTDEEP Remediation (REM)/Environmental Land Use Restriction (ELUR) database (updated September 2020), CTDEEP's List of Contaminated or Potentially Contaminated Sites in Connecticut (updated September 2020) and the CTDEEP LUST Coordination Program database for information relating to the Site and/or adjoining properties.

GZA notes that not all hazardous waste manifest records for the years 2009 through 2020 are available for review through the CTDEEP electronic document search portal. Manifest records may be available from other sources (e.g., generator, destination facility) and such records, if they exist, may not yet be available for review in CTDEEP records.

Site

The UST database and a UST Facility Notification Form dated March 2006 indicate a 4,000-gallon steel heating oil UST was removed from the Site in 1999. Two soil samples were reportedly collected from the bottom of the UST grave and analyzed for total petroleum hydrocarbons (TPH). TPH was detected at 77 and 120 mg/kg in the samples.

Twenty-one manifests were available for review on the CTDEEP Document Online Search Portal. The generator of the waste was listed as T-Bar, Inc., a historical occupant of the Site. The manifests were dated between 1981 to 1984 and were for the removal of F001 and F002 waste (both of which related to spent halogenated solvents). Shipments amounts ranged from 500 to over 6,000 pounds. GZA also reviewed manifests in the CTDEEP files and a hazardous waste generator report dated February 1986 that indicated 17,700 pounds of F001 waste and 2,075 pounds of F002 waste were generated. Based upon a hazardous materials inspection report dated September 1981, T-Bar used trichloroethane for dip degreasing and polymeric isocyanate and urethane resins to form an "InstaPak"

There was also a letter dated April 1985 from T-Bar to the CTDEEP indicating they were in receipt of the notice of violation (NOV) number 188. No other information about this NOV was available for review.

The Site was also listed in the CTDEEP list of potentially contaminated sites and the CTDEEP REM database. GZA reviewed a Property Transfer Act Form III and Environmental Condition Assessment Form (ECAF) from March 2006. According to the Form III, the certifying party was All 4 Kids, LLC. According to the ECAF, a septic system was used at the Site from 1963 to 1978. Prior Site use involved the manufacture of electronic switching components by T-Bar, Inc. (T-Bar). T-Bar also performed vapor degreasing and foam packing. The ECAF indicates the following Areas of Concern (AOCs):

- AOC-1 Exterior Doors
- AOC-2 Loading Dock

- AOC-3 Sub-Floor Conditions
- AOC-4 Former 4,000-gallon UST
- AOC-5 Former Septic System and Drywell
- AOC-6 Concrete Pads

The ECAF indicated releases of extractable total petroleum hydrocarbons (ETPH) and/or semi-volatile organic compounds (SVOCs) at each of the AOCs and the concentration of SVOCs and EPTH in soil at AOC-4 reportedly exceeded Remediation Standard Regulations (RSR) criteria.

GZA reviewed a Phase I ESA by LBG dated December 2005. According to the Phase I, the Site has been occupied by Angelique and Company, Inc., Electronics Control, Inc., T-Bar, Inc., Data Switch Inc, and Surgical Dynamics. The Site was connected to public sewer in 1978, public water in 1990, and natural gas in 1991. According to LBG the former well is still present and should be abandoned. The septic tank and impacted soils were removed by Land Tech in 1990. LBG identified the following recognized environmental conditions and recommended a Phase II investigation: former UST, former septic system, electrical transformer, concrete pad that supported an emergency generator, side doors, loading dock area, and soil quality under the building.

LBG performed a Phase II investigation at the Site as summarized in their February 2006 Phase II ESA Report. LBG investigated soils at the former UST and septic system, transformer pad, concrete pad that supported an emergency generator, loading dock, and by the building doors. LBG also sampled soil and soil vapor beneath the building. LBG performed 21 soil borings, installed two monitoring wells, sampled Site groundwater, tested the drinking water and tested indoor air for radon. LBG detected SVOCs and ETPH in shallow soils by the building doors and loading dock, polychlorinated biphenyls (PCBs) around the transformer pad, and SVOCs and ETPH around the concrete pad for the emergency generator. These detections were below applicable criteria. SVOCs and ETPH were detected in one of the interior soil boring samples and VOCs were detected in interior soil vapor samples. The detections in soil and soil vapor inside the building were reportedly below applicable criteria. SVOCs and ETPH were detected in soil samples from the former UST grave at concentrations above applicable criteria. VOCs were also detected at concentrations below applicable criteria. ETPH was detected in one soil sample from the former septic system at a concentration below applicable criteria. LBG reported that no ETPH or VOCs were detected in the groundwater samples, however naphthalene was detected in one sample below applicable criteria. The radon results were reported at less than 1 picocurie per liter and no lead was reported in the drinking water sample.

Adjoining/Adjacent Properties

<u>131 Danbury Road (southern abutter - sidegradient)</u> – The UST database indicates a 4,000-gallon fiberglass heating oil UST is currently in use at the Site. The database has two listings that appear to be identical. No other information was available for review.

Sixteen manifests were available for review on the CTDEEP Document Online Search Portal. The generator of the waste was listed as Perkin Elmer. The manifests were for the removal of 375 cubic yards of 1,1,1 trichloroethane impacted soils in 1987 and 1988, for the disposal of 539 gallons of freon and domestic sewage in 1988, and for the disposal of 55-gallons of waste poison in 1991.

The property was listed in the CTDEEP list of potentially contaminated sites and the CTDEEP REM database. These records indicate the property is in the Property Transfer Program and the most recent Form III was received in March 2018 and remediation was started in August 2018.

The property was also listed in the spill database for a spill of No. 2 fuel oil from an inground tank failure in 2002. The tank was reportedly removed.

149 Danbury Road (northern abutter) – GZA reviewed a hazardous waste manifest for 149 Danbury Road for the shipment of 1,051 gallons of D001 (waste flammable liquid) hazardous waste in March 1991

Copies of information obtained from CTDEEP electronic resources are included in Appendix C.

8.0 INTERVIEWS

GZA interviewed Mr. Thomas Pajolek of CBRE, the real estate agent for the Site, Doug Bernstein, a representative of the owner of the Site, and certain Town of Wilton municipal officials as part of this assessment. The information provided is discussed and referenced within the text of this Phase I ESA Report.

9.0 USER PROVIDED INFORMATION

GZA requested information from the Client regarding title information, environmental liens, Activity and Use Limitations, and specialized knowledge or commonly known information regarding the Site and, if applicable, the reason for a significantly discounted purchase price.

A completed User Questionnaire was provided on April 21, 2021 by a representative of the User/Client. GZA's review of the User Questionnaire did not identify additional environmental conditions or historical Site uses beyond those indicated by other resources reviewed by GZA during our assessment of the Site including regulatory information, Site reconnaissance and interviews with the exception of several prior reports, discussed in Section 5.0. A copy of the User Questionnaire is attached as Appendix E.

10.0 NON-ASTM E1527-13 CONSIDERATIONS

This Phase I ESA does not include an evaluation of environmental issues or conditions that ASTM E1527-13 stipulates as non-scope considerations with the exception of limited sampling of building caulk for polychlorinated biphenyls (PCBs).

GZA visually identified building construction materials suspected of containing PCBs. GZA did not observe caulk on those accessible areas within the building interior. The assessment was performed by collecting bulk samples from representative accessible caulks on the exterior of the building and analyzing the samples to provide an indication of the presence of PCBs in the tested materials. Samples were placed in individual re-sealable plastic bags, wet wiped of visible debris, labeled with unique sample numbers using an indelible marker, recorded, and dispatched to an accredited laboratory for analysis following Chain of Custody protocol. A total of six samples were collected and submitted for analysis for PCBs.

Phoenix Environmental Laboratories (Phoenix) analyzed the samples for PCB content using gas chromatography by USEPA Method 8082, Test Methods for Evaluating Solid Waste. Phoenix is a State of Connecticut – Department

of Public Health licensed laboratory (Registration No. PH - 0750). A copy of the laboratory's accreditation is included in Appendix F.

As indicated in the laboratory analytical results, PCBs were not detected in the six caulk samples submitted. PCB sampling results are summarized in Table 1 in Appendix F, and a copy of the laboratory analytical report is provided in Appendix F.

11.0 FINDINGS AND CONCLUSIONS

GZA performed a Phase I ESA in general conformance with the scope and limitation of ASTM E1527-13 and with the Connecticut Department of Energy and Environmental Protection (CTDEEP) Site Characterization Guidance Document (SCGD, rev 12/2010) for the property located at 141 Danbury Road in Wilton, Connecticut. Any exceptions to, or deletions from, this practice are described in Section 1.4 of this Phase I ESA Report.

11.1 RECOGNIZED ENVIRONMENTAL CONDITIONS (RECS)

This Phase I ESA revealed evidence of the following AOCs, some of which are also RECs, in connection with the Site:

- AOC-1 Exterior Doors– According to a 2006 Environmental Condition Assessment Form (ECAF), low concentration of certain polyaromatic hydrocarbons (PAHs) and/or extractable total petroleum hydrocarbons (ETPH) were detected in shallow soil samples collected adjacent to exterior doors of the building that may have been near the former manufacturing areas.

- AOC-2 Loading Dock – A loading dock is located on the southeast side of the building.

- AOC-3 Sub-Floor Conditions - According to the 2006 ECAF, low concentration of certain PAHs and/or ETPH were detected in shallow soil samples collected beneath the floor of the building and certain volatile organic compounds (VOCs) were detected in soil vapor samples collected beneath the building.

- AOC-4 Former 4,000-gallon Underground Storage Tank (UST) – A 4,000-gallon heating oil UST was removed from the Site in 1999. Low concentrations of total petroleum hydrocarbons (TPH) were detected in two soil samples collected from the bottom of the tank grave when it was removed. According to the 2006 ECAF, low concentration of certain PAHs and/or ETPH were detected in soil samples collected from the former tank grave in 2006.

- AOC-5 Former Septic System and Drywell – A septic system was used at the Site prior to 1978. According to the 2006 ECAF, the septic tank and some soil were removed in 1990, and a low concentration of ETPH was detected in a soil sample collected from the former septic system area in 2006.

- AOC-6 Concrete Pads – Two concrete pads, one used for an emergency generator and one for a transformer, are located to the north of the building. According to the 2006 ECAF, low concentration of certain PAHs and/or ETPH were detected in soil samples collected in 2006 from around the concrete pad for the emergency generator, and low concentrations of polychlorinated biphenyls (PCBs) were detected in soil samples from around the transformer.

11.2 CONTROLLED RECOGNIZED ENVIRONMENTAL CONDITIONS (CRECS)

In GZA's opinion, this Phase I ESA revealed no evidence of CRECs in connection with the Site.

11.3 HISTORIC RECOGNIZED ENVIRONMENTAL CONDITIONS (HRECS)

In GZA's opinion, this Phase I ESA revealed no evidence of HRECs in connection with the Site.

11.4 *DE MINIMIS* CONDITIONS

This Phase I ESA revealed no evidence of *de minimis* conditions in connection with the Site.

11.5 DATA GAPS AND THEIR SIGNIFICANCE

This Phase I ESA identified the following data gaps in connection with the Site:

- Past owners were not interviewed as part of this assessment. However, it is unlikely that the past owners would provide information not obtained from other sources. It is GZA's opinion that this is not a significant data gap.

11.6 NON-ASTM E1527-13 CONSIDERATIONS

This Phase I ESA does not include an evaluation of environmental issues or conditions that ASTM E1527-13 stipulates as non-scope considerations with the exception of limited sampling of building caulk for polychlorinated biphenyls (PCBs). A total of six samples of caulk were collected and submitted for analysis for PCBs; no PCBs were detected

11.7 CONNECTICUT TRANSFER ACT APPLICABILITY

Connecticut General Statutes (CGS) Section 22a-134 as amended, commonly known as the Connecticut Transfer Act, requires the disclosure of environmental conditions when certain real properties and/or businesses, referred to in the Act as "establishments," are "transferred." Effective October 1, 2020, an "establishment" is defined as follows:

> "'Establishment' means any real property at which or any business operation from which (A) on or after November 19, 1980, there was generated more than one hundred kilograms of hazardous waste in any one month, (B) hazardous waste generated at a different location was recycled, reclaimed, reused, stored, handled, treated, transported or disposed of, (C) the process of dry cleaning was conducted on or after May 1, 1967, (D) furniture stripping was conducted on or after May 1, 1967, or (E) a vehicle body repair facility was located on or after May 1, 1967."

GZA notes that the full definition of "establishment" in the Act contains numerous exceptions to what constitutes an "establishment" including exceptions for one-time shipments of hazardous waste, generation of universal wastes and remediation waste, among others. Similarly, there are a number of exceptions related to the definition of a qualifying "transfer." The terms "transfer of establishment" and "hazardous waste," among others, are also defined in the Act.

Based on GZA's review of information discussed in this report, the Site meets the definition of an "establishment" under the Connecticut Transfer Act because more than 100 kg of hazardous waste was generated at the Site in one month. Records indicate between 500 and 6,000 pounds of hazardous waste were shipped offsite between

1981 to 1984 by T-Bar, Inc. (a former tenant at the Site). A determination as to whether a transaction is subject to the Connecticut Transfer Act is a legal one and advice of environmental council should be obtained.

12.0 REFERENCES

1. ASTM Designation E1527-13 Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process.
2. Environmental Data Resources, Inc. (EDR) EDR Radius Map Report, dated March 18, 2021.
3. EDR Certified Sanborn Map Report, dated March 18, 2021.
4. EDR-City Directory Image Report, dated March 22, 2021.
5. USGS Topographic Map, Wilton, Connecticut, 7.5-minute Series, National Geographic Society, 2011.
6. Town of Wilton property assessment and GIS information, http://wilton.mapxpress.net/
7. USGS Bedrock Geology Map for Connecticut, http://mrdata.usgs.gov/geology/state/map.html.
8. USDA Web Soil Survey Soil Map for Connecticut (CT600), http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx, U.S. Department of Agriculture (USDA) Natural Resources Conservation Service (NRCS).
9. CT ECO Surficial Materials Map (CTDEEP, 2009).
10. CT ECO Water Quality Classifications (CTDEEP, 2016).
11. Historical topographic maps, NETR Online at http://www.historicaerials.com/.
12. Historical aerial photographs, University of Connecticut (UConn) Map and Geographic Information Center (MAGIC) at http://magic.lib.uconn.edu/connecticut_data.html#indexes.
13. Connecticut Department of Energy and Environmental Protection (CTDEEP) Site Characterization Guidance Document (SCGD, rev 12/2010).

13.0 ENVIRONMENTAL PROFESSIONAL OPINION

I declare, to the best of my professional knowledge and belief, that I meet the definition of Environmental Professional as defined in §312.10 of 40 CFR 12; that I have the specific qualifications based on education, training, and experience to assess a property of the nature, history and setting of the subject property; and that I have developed and performed all appropriate inquiries in conformance with the standards and practices set forth in 40 CFR 312. The signature of the Environmental Professional is contained on the cover letter of this Phase I ESA Report. The qualifications of the Environmental Professional are provided in Appendix G.

14.0 LIMITATIONS

GZA prepared this Phase I ESA on behalf of, and for the exclusive use of Fuller Development, LLC for the stated purposes for the Site identified in this Report. Use of this Report, in whole or in part, at other locations, or for other purposes, might lead to inappropriate conclusions, and we do not accept any responsibility for the consequences of such use. Further, reliance by any party not identified in the agreement, for any use, shall be at that party's sole risk, and without any liability to GZA.

GZA performed its services to render an opinion on the presence of RECs in connection with the Site. We performed our services using that degree of skill and care ordinarily exercised by qualified professionals performing the same type of services, at the same time, under similar conditions, at the same or a similar property. We make no warranty, express or implied.

Our findings and conclusions are based on the work conducted as part of the Scope of Services set forth in this Report and reflect our professional judgment. Our findings and conclusions should not be considered as scientific certainties or engineering certainties, but rather as our professional opinions concerning the limited data gathered during the course of our work.

No environmental site assessment can eliminate the uncertainty of the possible presence of RECs. This Report was prepared to help reduce, not to eliminate, such uncertainties. Consistent with ASTM E1527-13, we developed our opinions in light of the constraints imposed by time and budget.

As indicated within this Report, we observed conditions at the Site and at adjoining properties for evidence of RECs at the Site. Where access to portions of the Site or to structures on the Site was unavailable or limited, GZA renders no opinion as to the presence of hazardous substances, hazardous waste, or petroleum products, or to the presence of indirect evidence relating to these materials, in those portions of the Site or structure. In addition, GZA renders no opinion as to the presence of hazardous substances, hazardous waste, or petroleum products, or to the presence of indirect evidence relating to these materials, where direct observation of the interior walls, floors, and/or ceilings of a structure on the Site was obstructed by objects and/or coverings on and/or over such surfaces. We based our opinions on such limited observations. Additionally, some activities or events impacting environmental conditions at the Site or on adjoining properties might have been transient and not observable at the time of GZA's Site reconnaissance.

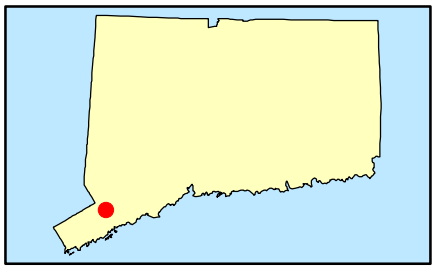
We relied upon information made available by federal, state, and local authorities, the Key Site Manager, and others. We did not attempt to independently verify the accuracy or completeness of that information. We noted inconsistencies in this information within the Report.

The lender, seller, buyer, or other parties that might become involved with the Site might develop additional opinions or information regarding the presence or absence of RECs at the Site. Such additional opinions or information might not fully support the opinions provided in this Report. In the event such additional opinions or information is developed, we recommend retaining GZA to review this material so that we have the opportunity to evaluate and modify, as necessary, the opinions provided in this Report.

Unless otherwise specified within this Report, we have rendered no opinion on the compliance of Site conditions or activities with federal, state, and local codes, laws, or regulations.

GZA based the opinions expressed in this Report on conditions observed during the course of our work on this Site; these conditions might change over time. ASTM E1527-13 specifies that observations and opinions are only valid for 180 days from the date the underlying information is developed. After 180 days, portions of this Report may need to be updated.

FIGURES



SOURCE : USGS TOPOGRAPHIC QUADRANGLES SCANNED BY THE NATIONAL GEOGRAPHIC SOCIETY & I-CUBED, COPYRIGHT 2011

Data Supplied by : esri

0 1,000 2,000 4,000 6,000

SCALE IN FEET

N W E S

PROJ. MGR.: AJT
DESIGNED BY: AJT
REVIEWED BY: AJT
OPERATOR: AJT

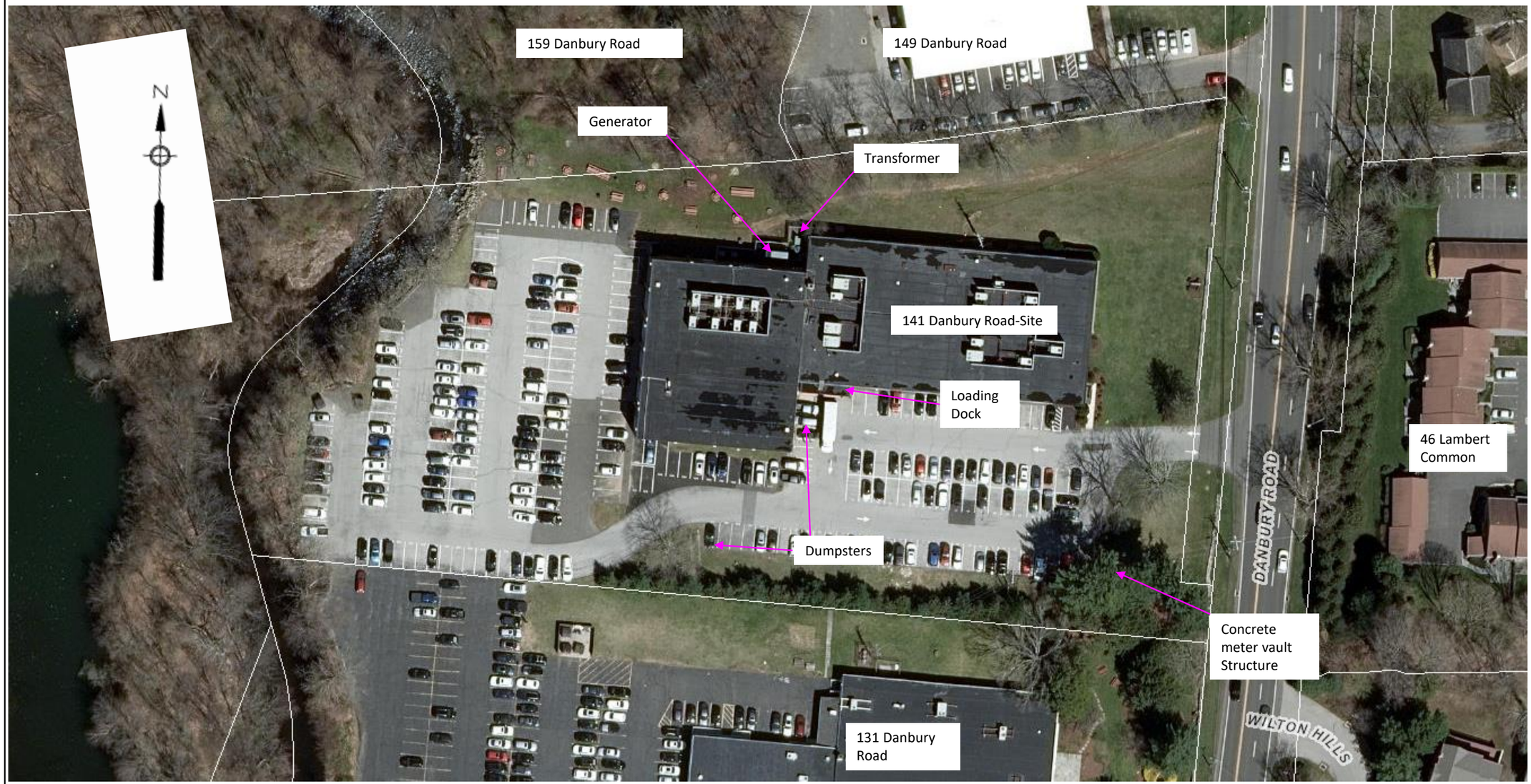
DATE: 03-22-2021

FIGURE 1 - SITE LOCUS

JOB NO.
05.0046756.00

PHASE I - ESA
141 DANBURY RD
WILTON, CONNECTICUT

FIGURE NO.
1



GZA NOTES FOR PLAN:

1. THE BASE MAP WAS DEVELOPED FROM THE TOWN OF WILTON GEOGRAPHICAL INFORMATION SYSTEM MAPPING ON MARCH 22, 2021.

PROJ MGR: AJT
DESIGNED BY: AJT
REVIEWED BY: AJT
DATE: March 22, 2021

GZA GeoEnvironmental, Inc.

NOT TO SCALE

141 Danbury Road
Wilton, CT

Site Plan

GZA JOB NO.
05.0046756.00

FIGURE NO.
2