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35 Nutmeg Drive Suite 325 Trumbull, CT 06611 T: 203:380.8188 F: 203:375.1529 www.gza.com August 10, 2021 File No. 05.0046756.02

Mr. Michael Conklin Wilton Inland Wetlands Commission 238 Danbury Road Wilton, CT 06897

Re: Transmittal of Environmental Documents 141 Danbury Road, Wilton, CT

Dear Mr. Conklin:

GZA GeoEnvironmental Inc (GZA) has prepared this letter on behalf of our client, FDSPIN 141 DR, LLC to convey to the Town of Wilton Inland Wetlands Commission (IWC) certain environmental documents regarding the property located at 141 Danbury in Wilton, Connecticut ("Site") and to summarize the conclusions of these reports to the IWC. The IWC recently reviewed a submittal for the proposed redevelopment of the Site that includes the construction of a new residential apartment building. You have requested copies of the environmental reports. On behalf of FDSPIN 141 DR, LLC, GZA has attached the following documents:

- Phase I Environmental Site Assessment (ESA), GZA, April 2021 (including a Phase I ESA report completed in December 2005 by Legette, Brashears & Graham [LBG] and a Phase II report completed in February 2006 by LBG)¹.
- Transfer of Establishment, Form III (Real Estate) and Environmental Condition Assessment Form (ECAF), July 12, 2021.

A brief summary of the environmental conditions of the Site and actions that are planned to be completed to achieve compliance with Connecticut Transfer Act follows. Additional details are provided in the attached reports.

Environmental Summary

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. From 1965 until the late 1980s, the Site was occupied by manufacturers of electrical components; however, since the early 1990s, the Site has been used solely for office purposes.

As described in further detail in GZA's Phase I report, numerous environmental investigations of the Site have previously been performed including the collection and analysis of several

¹ Since the 2006 Phase II investigation was conducted long after manufacturing activities had ceased at the Site, and no changes to Site use occurred since that time, FDSPIN 141 DR, LLC did not conduct a new Phase II investigation.





dozen soil samples and the installation and sampling of approximately 10 groundwater monitoring wells and no significant impacts to soil or groundwater were identified. The attached figure titled "Site Plan with Sampling Locations" from 2006 depicts the locations of the soil and groundwater samples. Based on GZA's review of the previous environmental investigations, only one soil sample (labeled TB-1 on the attached figure) associated with a former fuel oil underground storage tank (UST) that was removed from the Site 22 years ago in 1999 contained petroleum-related compounds at a concentration slightly above the Connecticut Department of Energy and Environmental Protection's (CTDEEP) Remediation Standard Regulations (RSR) criteria. Remediation of this one small area will be conducted during redevelopment.

Recent groundwater sampling by GZA in June 2021 indicated no impacts to groundwater were identified, except for results at two locations where petroleum constituents related to parking lot surface water runoff were detected (identified as wells LBGMW-1 and MW-8 on the attached figure). A draft summary table of the groundwater quality is attached. We note that runoff from the parking lot is currently uncontrolled sheet flow, and we understand that the redevelopment plans will incorporate stormwater Best Management Practices. The overall site improvements that are proposed as part of the redevelopment will improve water quality on the Site.

Because the Site meets the definition of an "establishment" under the Connecticut Transfer Act due to the historical manufacturing operations, a Form III Transfer of Establishment and Environmental Condition Assessment Form (ECAF) were submitted to the CTDEEP by FDSPIN 141 DR, LLC, when they acquired the Site in July 2021. As described in the attached flow chart, the Transfer Act is a very rigorous process overseen by CTDEEP and requires investigation and, if necessary, remediation of the Site to achieve compliance with the regulations within specified timeframes. FDSPIN 141 DR, LLC, is the Certifying Party to the Form III filing and has retained GZA as their Licensed Environmental Professional (LEP) to assist them with completing the Transfer Act requirements. Investigations are currently being conducted at the Site to meet the requirements of the Connecticut Transfer Act.

If you should have any questions regarding the information included herein, please feel free to contact Adam Henry at 860-858-3166.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

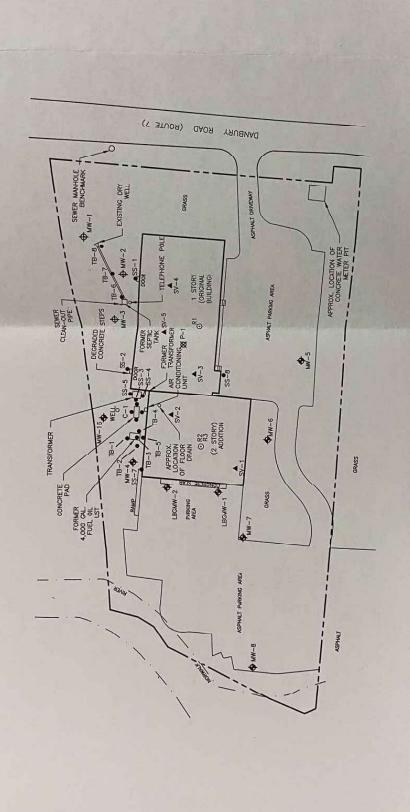
Joseph T. Trzaski, LEP Senior Project Manager

Adam T. Henry, LEP Associate Principal Kathleen A. Cyr, LEP Consultant/Reviewer

Attachments: Site Plan and Sampling Locations, 2006, LBG

Table 1 Summary of Groundwater Analytical Results - Draft

Transfer Act Flow Chart



WILTON, CONNECTICUT 141 DANBURY ROAD

SITE PLAN WITH SAMPLING LOCATIONS

	PREPARED BY: INCRETTE BRASHFARS & CRAHAM INC.	Professional Granni-Water and Invironmental Francisco.	4 Research Drive	Suite 301	Shelton, CT 06484	(203) 929-8555	AB DATE 27/08 BISIDE.
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1. MAP BASED ON FIGURE "SITE PLAN, 141 DANBURY ROAD, WILTON, CONNECTICLT FIGURE 2" PREPARED BY GZA, APRIL 28, 2005. THE LOCATION OF THE MONITOR WELLS AND SAMPLE COLLECTION POINTS WERE MEASURED FROM EXISTING SITE FAURES AND ARE APPROXIMATE. SOIL SAMPLE NOT COLLECTED AT SV-5.

NOTES:

LEGEND

MONITOR WELL CONSTRUCTED BY LAND TECH REMEDIAL, INC. IN 1990 SOIL AND VAPCR SAMPLE COLLECTED BY LBG IN 2006 POTABLE WATER SAMPLE COLLECTED BY LBG IN 2006 MONITOR WELL CONSTRUCTED BY GZA IN 1992 MONITOR WELL CONSTRUCTED BY LGB IN 2006 SOIL SAMPLING LOCATIONS BY LBG IN 2006 RADON SAMPLE COLLECTED BY LEG IN 2006 PROPERTY BOUNDARY MW-5 LBMW-1 SS-8 TB-1 **▲** SV-2 - N <u>«</u>

DWGLCINCFI9-2 dwg, Layouti, 2/3/2006 1:45:54 PM, Canon Graphic Color W2200

Summary of Groundwater Analytical Results DRAFT June 2021

141 Danbury Road Wilton, Connecticut

	Sample ID		CT	CTRSRs		TB062221	LBGMW-1	LBGMW-1 LBGMW-2	9-MW	MW-8	MW-4
	Sample Date	CWPC	JdMS	JAMD-8	JAM5-J/I	6/18/2021	6/18/2021	6/18/2021	6/18/2021	1707/81/9	6/18/2021
Analytical Parameter	Units	Sir.	2		2112-21	1707/01/0	1707 101 10	1707/01/0	1707/01/0	1707/01/0	120210110
Metals											
Arsenic	ug/L	50	4	NE	NE	NT	ND<4	ND<4	ND<4	ND<4	ND<4
Barium	T/gn	1,000	2,200	NE	NE	IN	73	ND<50	210	120	140
Cadmium	T/gu	5	9	NE	NE	NT	ND<5	ND<5	ND<5	S>QN	ND<5
Copper	T/gn	1,300	48	NE	SE	LN	ND<40	ND<40	ND<40	ND<40	ND<40
Chromium	T/gn	50	NE	NE	NE	LN	ND<50	ND<50	ND<50	ND<50	ND<50
Lead	T/gn	15	13	NE	NE	LN	ND<13	ND<13	ND<13	ND<13	ND<13
Nickel	T/gu	100	088	NE	NE	LN	ND<50	ND<50	ND<50	ND<50	ND<50
Selenium	T/gu	50	50	NE	NE	LN	ND<10	ND<10	ND<10	ND<10	ND<10
Silver	T/gn	36	12	NE	NE	IN	ND<12	ND<12	ND<12	ND<12	ND<12
Zinc	T/gu	5,000	123	NE	NE	NT	88	43	ND<20	ND<20	22
Polyaromatic Hydrocarbons (PAHs) by EPA Method 8270											
Phenanthrene	T/gu	200	14	NE	NE	LN	0.17	ND<0.077	ND<0.077	0.33	ND<0.077
Fluoranthene	T/gn	280	3,700	NE	NE	IN	ND<1	ND<1	ND<1	1.6	ND<1
Pyrene	T/gu	200	110,000	NE	NE	LN	ND<1	ND<1	ND<1	1.2	ND<1
Benzo[a]anthracene	T/gn	0.06	0.3	NE	NE	NT	0.2	ND<0.06	ND<0.06	0.48	ND<0.06
Chrysene	T/gn	4.8	0.54	NE	NE	IN	ND<0.5	ND<0.5	ND<0.5	0.89	ND<0.5
Benzo[b]fluoranthene	T/gu	0.08	0.3	NE	NE	NT	0.41	ND<0.08	ND<0.08	1.0	ND<0.08
Benzo[k]fluoranthene	T/gn	0.5	0.3	NE	NE	NT	ND<0.3	ND<0.3	ND<0.3	0.51	ND<0.3
Benzo[a]pyrene	T/gn	0.2	0.3	NE	NE	NT	0.28	ND<0.2	ND<0.2	0.73	ND<0.2
Indeno[1,2,3-cd]pyrene	ng/L	$\theta.I$	0.54	NE	NE	NT	0.3	ND<0.1	ND<0.1	0.61	ND<0.1
Dibenz[a,h]anthracene	ng/L	0.1	0.3	NE	NE	NT	ND<0.1	ND<0.1	ND<0.1	0.12	ND<0.1
Benzo[g,h,i]perylene	T/gn	0.48	150	NE	NE	IN	ND<0.4	ND<0.4	ND<0.4	69.0	ND<0.4
Volatile Organic Compounds (VOCs) by EPA Method 8260											
1,1,1-Trichloroethane	ng/L	200	62,000	059	16,000	ND<1	ND<1	1	ND<1	ND<1	ND<1
Dioxane By Modified EPA 8260B											
1,4-Dioxane	ng/L	3.0	096	NE	NE	NT	ND<2.5	ND<2.5	ND<2.5	ND<2.5	ND<2.5
Extractable Total Petroleum Hydrocarbons (ETPH)											
CT ETPH	T/gu	250	250	*057	250*	LN	ND<100	ND<100	ND<100	260	ND<100

 $\ensuremath{\mathsf{ND}} = \ensuremath{\mathsf{indicates}}$ Non Detected above the laboratory minimum reporting limit.

NE= None Established NT = Not Taken

Italics = No RSR criteria available; 2018 Recommended Criteria Values for Common Additional Polluting

Substances are provided; site specific approval from CTDEEP necessary for use

* = No RSR Criteria available; Recommended Groundwater Volatilization Criteria provided from CTDEEP Technical Support Document: Recommended Criteria Values for Common

Additional Polluting Substances and Alternative Criteria Requests (September 2018)

Only detected constituents are shown.

CT RSRs = Connecticut Remediation Standard Regulations. GWPC = Groundwater Protection Criteria

SWPC = Surface Water Protection Criteria

R-GWVC = Residential Groundwater Volatilization Criteria

I/C-GWVC = Industrial/Commercial Groundwater Volatilization Criteria Bolded values exceeds one or more criteria.

Process for Filing Pursuant to CGS Section 22a-134a Transfer of Establishment Within 10 days of transfer, transferor submits: Transfer filing to DEP and all parties Appropriate fee payment Contaminated Sites or Clean or Previously Environmental Condition Assessment 3) Remediated Sites **Groundwater Monitoring** Form (ECAF) or other required Sites supporting documents Form I or Form II Form III or Form IV Form III - Establishment contaminated or environmental condition unknown Form I - No release of hazardous waste and either 1) no release of hazardous substance or Form IV - LEP verifies investigation and remediation is complete, except 2) hazardous substance release remediated for post remediation or natural attenuation monitoring. For Form IVs, a and verified by LEP schedule must be submitted with Form IV filling. Form II - Release remediated with DEP written approval or LEP verification ECAF must be submitted simultaneously with Form III or IV within 10 days of transfer. ECAF required with Form I, Commissioner's approval letter or LEP verification with Form II Within 30 days of receipt, DEP performs administrative review and notifies certifying party if filing is complete.DEP issues acknowledgment of complete filing. Within 90 days of receipt of filling, DEP performs administrative review and notifies certifying party in writing if filing is complete. DEP reviews ECAF to Yes No determine if DEP review & approval is required LEP oversees investigation and remediation (or monitoring at Form IV sites) DEP sends written notice that DEP review and approval of investigation and Within 75 days of notice of complete Form III, remediation (or monitoring at Form IV certifying party submits schedule for investigation sites) is required and remediation. For Form IVs, a schedule was included with Form IV filing. 1. Complete investigation and submit Within 30 days of written notice from DEP, The certifying party submits schedule for: documentation within 2 years of Commissioner 1. Investigation and remediation (Form III notice of complete Form III. may, at any time, 2. Initiate remediation and submit sites) notify the certifying documentation within 3 years of 2. Providing public notice of remediation party in writing that (Form III sites) notice of complete Form III. DEP review and 3. Submission of plans and reports 3. Complete remediation (final or approval is or is 4. Completion of monitoring. interim verification) within 8 years not required. of notice of complete Form III. Note: Public notice must be provided prior to initiating remediation All actions identified in the approved plans and reports completed pursuant to an approved schedule in accordance with Remediation Standard Regulations. LEP verifies investigation and remediation in accordance with Remediation Standard Regulations. DEP may audit any LEP verification of establishment up to three years after final verification. Approval by Commissioner Complete

This flow chart presents a generalized overview of the procedures and decisions associated with the Property Transfer Program. It does not reflect all decisions and processes associated with this program. Parties who filed a Form III prior to 10/1/09 may not be subject to the automatic 8 year timeframe to submit a verification or interim verification.