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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 (ECAAF), 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 LBG MW-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 (ECAAF) 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.

A handwritten signature in blue ink, appearing to read 'Joe Trzaski'.

Joseph T. Trzaski, LEP
Senior Project Manager

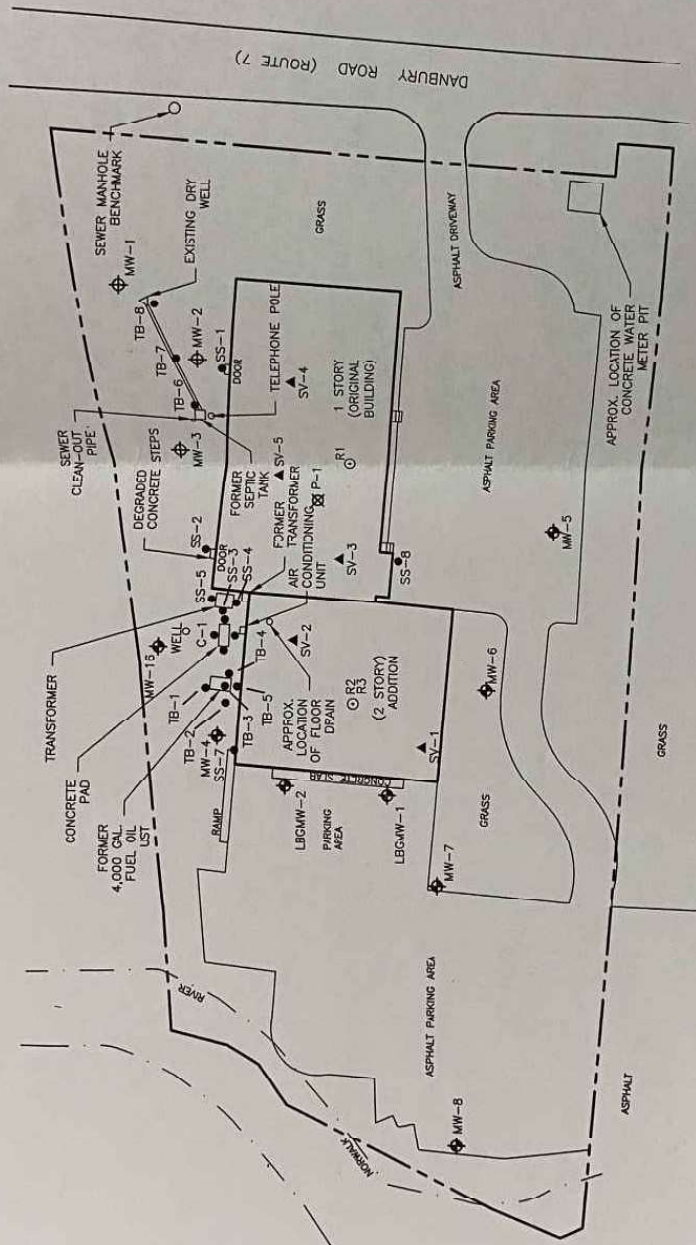
A handwritten signature in blue ink, appearing to read 'Adam Henry'.

Adam T. Henry, LEP
Associate Principal

A handwritten signature in blue ink, appearing to read 'Kathleen A. Cyr'.

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



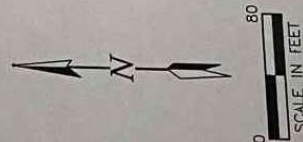
LEGEND

- MW-3
- MW-5
- LEMW-1
- SS-8
- TB-1
- SV-2
- R
- ⊗ P-1

PROPERTY BOUNDARY
 MONITOR WELL CONSTRUCTED BY LAND TECH REMEDIAL, INC. IN 1990
 MONITOR WELL CONSTRUCTED BY GZA IN 1992
 MONITOR WELL CONSTRUCTED BY LGB IN 2006
 SOIL SAMPLING LOCATIONS BY LGB IN 2006
 SOIL AND VAPOR SAMPLE COLLECTED BY LGB IN 2006
 RADON SAMPLE COLLECTED BY LGB IN 2006
 POTABLE WATER SAMPLE COLLECTED BY LGB IN 2006

NOTES:

1. MAP BASED ON FIGURE "SITE PLAN, 141 DANBURY ROAD, WILTON, CONNECTICUT FIGURE 2" PREPARED BY GZA, APRIL 28, 2005.
2. THE LOCATION OF THE MONITOR WELLS AND SAMPLE COLLECTION PONTS WERE MEASURED FROM EXISTING SITE FEATURES AND ARE APPROXIMATE.
3. SOIL SAMPLE NOT COLLECTED AT SV-5.
4. DESIGNATION SS-6 NOT USED.



141 DANBURY ROAD WILTON, CONNECTICUT

SITE PLAN WITH SAMPLING LOCATIONS

DATE	REVISED	PREPARED BY	CHECKED	WB	DATE	DATE	NO. OF
		LEGGETTE, BRASHEARS & GRAHAM, INC.					2
		Professional Civil-Water and Environmental Engineering Services					
		4 Research Drive					
		Suite 301					
		Shelton, CT 06484					
		(203) 929-8555					
DATE	FOR						

TABLE 1
Summary of Groundwater Analytical Results DRAFT
June 2021

141 Danbury Road
Wilton, Connecticut

Analytical Parameter		CTRSRs				I/C-GWVC					
		Sample ID	GWPC	SWPC	R-GWVC						
		Sample Date	Units								
Metals											
Arsenic	ug/L	50	4	NE	NE	NT	ND<4	ND<4	ND<4	ND<4	ND<4
Barium	ug/L	1,000	2,200	NE	NE	NT	73	ND<50	210	120	140
Cadmium	ug/L	5	6	NE	NE	NT	ND<5	ND<5	ND<5	ND<5	ND<5
Copper	ug/L	1,300	48	NE	NE	NT	ND<40	ND<40	ND<40	ND<40	ND<40
Chromium	ug/L	50	NE	NE	NE	NT	ND<50	ND<50	ND<50	ND<50	ND<50
Lead	ug/L	15	13	NE	NE	NT	ND<13	ND<13	ND<13	ND<13	ND<13
Nickel	ug/L	100	880	NE	NE	NT	ND<50	ND<50	ND<50	ND<50	ND<50
Selenium	ug/L	50	50	NE	NE	NT	ND<10	ND<10	ND<10	ND<10	ND<10
Silver	ug/L	36	12	NE	NE	NT	ND<12	ND<12	ND<12	ND<12	ND<12
Zinc	ug/L	5,000	123	NE	NE	NT	88	43	ND<20	ND<20	22
Polyaromatic Hydrocarbons (PAHs) by EPA Method 8270											
Phenanthrene	ug/L	200	14	NE	NE	NT	0.17	ND<0.077	ND<0.077	0.33	ND<0.077
Fluoranthene	ug/L	280	3,700	NE	NE	NT	ND<1	ND<1	ND<1	1.6	ND<1
Pyrene	ug/L	200	110,000	NE	NE	NT	ND<1	ND<1	ND<1	1.2	ND<1
Benzo[a]anthracene	ug/L	0.06	0.3	NE	NE	NT	0.2	ND<0.06	ND<0.06	0.48	ND<0.06
Chrysene	ug/L	4.8	0.54	NE	NE	NT	ND<0.5	ND<0.5	ND<0.5	0.89	ND<0.5
Benzo[b]fluoranthene	ug/L	0.08	0.3	NE	NE	NT	0.41	ND<0.08	ND<0.08	1.0	ND<0.08
Benzo[k]fluoranthene	ug/L	0.5	0.3	NE	NE	NT	ND<0.3	ND<0.3	ND<0.3	0.51	ND<0.3
Benzo[a]pyrene	ug/L	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	ug/L	0.1	0.54	NE	NE	NT	0.3	ND<0.1	ND<0.1	0.61	ND<0.1
Dibenz[a,h]anthracene	ug/L	0.1	0.3	NE	NE	NT	ND<0.1	ND<0.1	ND<0.1	0.12	ND<0.1
Benzo[ghi]perylene	ug/L	0.48	150	NE	NE	NT	ND<0.4	ND<0.4	ND<0.4	0.69	ND<0.4
Volatile Organic Compounds (VOCs) by EPA Method 8260											
1,1,1-Trichloroethane	ug/L	200	62,000	650	16,000	ND<1	ND<1	1	ND<1	ND<1	ND<1
Dioxane By Modified EPA 8260B											
1,4-Dioxane	ug/L	3.0	960	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	ug/L	250	250	250*	250*	NT	ND<100	ND<100	ND<100	260	ND<100

Notes:

ND = 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

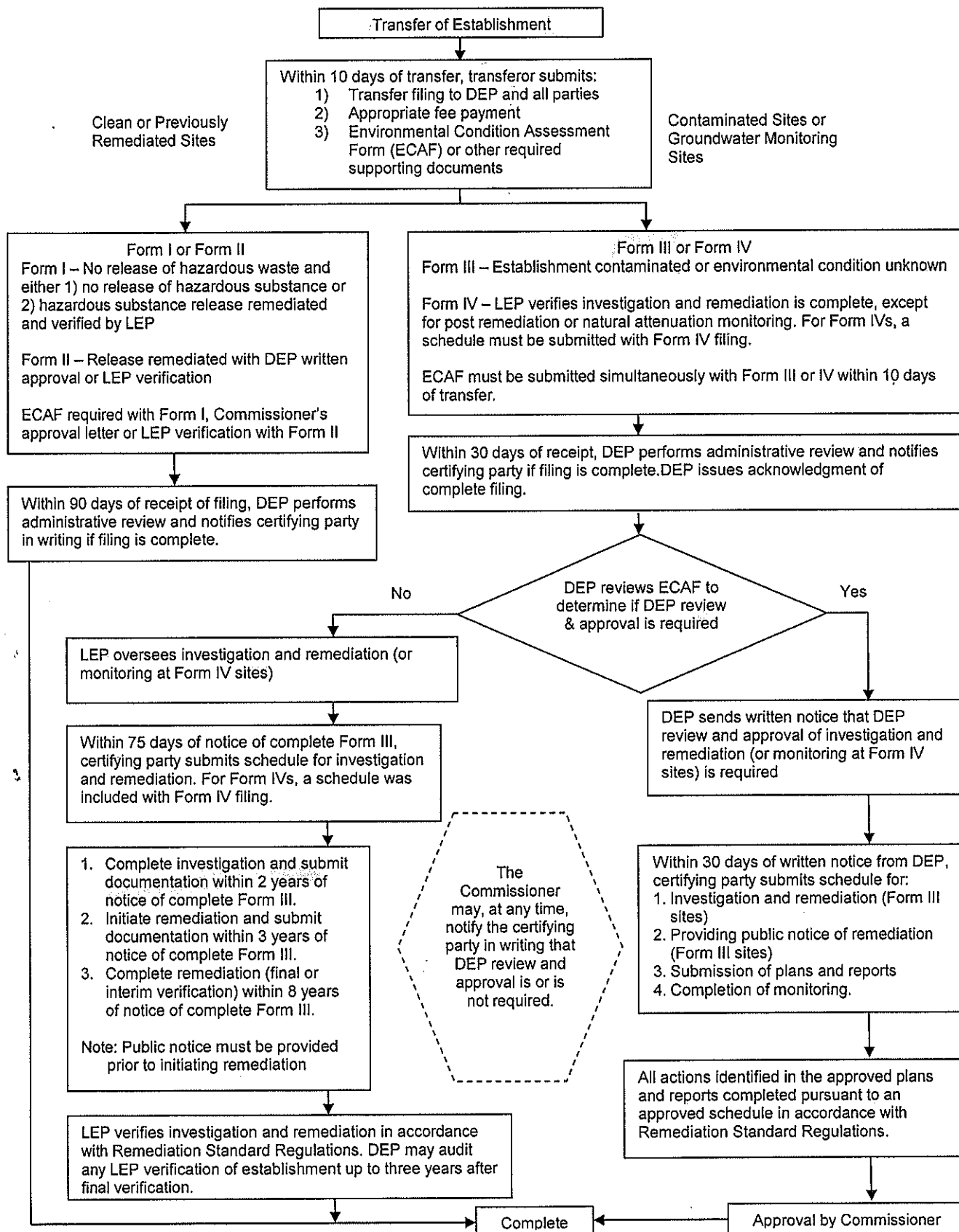
SWPC = Surface Water Protection Criteria

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**



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.