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August 3, 2021
File No. 05.0046756.02

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

Re: 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 respond to inquiries from the Town of Wilton Inland Wetlands Commission regarding a recent submittal of design drawings for the proposed redevelopment of the property located at 141 Danbury in Wilton, Connecticut ("Site"). The redevelopment entails the construction of a four-story residential apartment building with a total of 173 units. The Staff's inquiries in their July 29, 2021, Memorandum are indicated in **bold** below, followed by GZA's response in *italics*.

Inland Wetland Commission Comment #4:

4) On July 22, 2021, Mr. Fuller shared with the Commission a Phase II environmental site investigation has been completed at the site. He explained elevated levels of contaminants were discovered and the site will ultimately be cleaned up because the Connecticut Department of Energy and the Environment (CT DEEP) is requiring remediation. Mr. Fuller agreed to share that report with the Commission.

It is important to understand the current site conditions, the extent of any on-site contamination and how it will be cleaned up. A remediation plan prepared by a Licensed Environmental Professional (LEP) should be provided to the Commission to ensure the applicant will handle the contamination. If the contamination is limited to the soil, then the applicant should show how the contamination will be remediated prior to construction. If the contaminants are in the groundwater, the applicant should be able to present a remediation plan which explains if the remediation will be a short duration or an ongoing program that will last post-development.

In July 2021, the Site was entered into the Connecticut Property Transfer Act through the filing of a Form III Transfer of Establishment with the CTDEEP and FDSPIN 141 DR, LLC, has retained GZA as the LEP to assist them with completing the tasks necessary to achieve compliance with the CTDEEP Remediation Standard Regulations (RSRs). Based on our review of the environmental documents and reports that are available for the Site, only one soil sample associated with a former fuel oil underground storage tank (UST) that has been removed from the Site was identified that contained petroleum-related compounds in soil at concentrations slightly above the RSRs. Remediation of this area will be incorporated into the redevelopment plan for the Site and will be conducted concurrently with the redevelopment. Potential



remedial options include excavation and offsite disposal of the polluted soil or excavation and consolidation of the materials beneath the proposed building structures. Any proposed remediation is anticipated to be short duration and will not last "post-development".

Recent groundwater sampling by GZA indicated no impacts to groundwater above the RSRs, except for results at two locations where petroleum constituents related to parking lot runoff were detected. 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.

Inland Wetland Commission Comment #5:

5) The topic of subsurface environmental contamination is quite concerning as it relates to stormwater infiltration on the site. Is it possible for infiltrated stormwater to come in contact with contaminated soils and possibly leach pollutants into the groundwater or the stormwater management system?

As indicated above, only one soil sample collected at the Site contained petroleum-related compounds in soil at concentrations slightly above the RSRs. The sample was located at 7 to 8 feet below grade and will be remediated as part of site redevelopment; therefore, stormwater will not come into contact with these soils. It is GZA's opinion that there is no reason to believe that contaminants will leach into groundwater or the stormwater management system. Rather, the proposed infiltration will improve water quality on the Site and mitigate the potential for petroleum related compounds from entering the groundwater.

We trust that this response provides the Inland Wetlands Commission with the necessary information to approve the proposed redevelopment plans for the Site. If you should have any questions, feel free to contact Adam Henry at 860-965-1081.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

A handwritten signature in blue ink, appearing to read 'Joseph T. 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