

# Partial Corrective Action Plan: 202 Bay Street, St. Johnsbury, Vermont

SMS #20204966  
May 5, 2022



## PROJECT NO.

20-117

## REVIEWED BY:

KJM 041822

## PREPARED FOR:

Brandon McFarlane/  
Owner, CEO  
Zion Growers  
74 Mountain Avenue /  
St. Johnsbury, Vermont  
05819

## PREPARED FOR:

Irene Nagle/ Senior Planner  
Northeastern Vermont  
Development Association  
36 Eastern Avenue, Suite 1 /  
St. Johnsbury, Vermont 05819

## SUBMITTED BY:

Lee Rosberg / Senior Geologist  
Stone Environmental, Inc.  
535 Stone Cutters Way  
Montpelier / VT 05602  
[lrosberg@stone-env.com](mailto:lrosberg@stone-env.com)  
802.229.5378

---

# Acknowledgements

---

This project was undertaken by Stone Environmental, Inc. as a subconsultant to Stantec Consulting Services, Inc. for Zion Growers, with funding provided by the Northeastern Vermont Development Association through a United States Environmental Protection Agency Brownfields Assessment Coalition Grant.

---

# Title and Approval Page

---

## Document Title

Partial Corrective Action Plan: 202 Bay Street, St. Johnsbury, Vermont, SMS #20204966

May 5, 2022

## Document Prepared by:

Stone Environmental, Inc., 535 Stone Cutters Way, Montpelier, VT 05602 (802) 229-4541

## Document Preparer Approvals:

Lee Rosberg, Senior Geologist, Stone Environmental, Inc.

I certify under penalty of perjury that I am an environmental professional and that all content contained within this deliverable is to the best of my knowledge true and correct.



Signature

5/5/2022

Date

Katrina Mattice, PE, Environmental Engineer, Stone Environmental, Inc.

By my signature, as a Vermont Registered Engineer that I hereby certify that I have reviewed this document.



Signature

May 5, 2022

Date



---

# Executive Summary

---

Stone Environmental, Inc. (Stone) has prepared this Partial Corrective Action Plan (CAP) for the Zion Growers property located at 202 Bay Street in St. Johnsbury, Vermont (the Site; Figure 1 in Appendix A). The Partial CAP was prepared for Zion Growers and the Northeastern Vermont Development Association (NVDA) who is providing funding for environmental assessment and remedial planning. Zion Growers enrolled in Vermont's Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) program on March 16, 2021 as a *bona fide* prospective purchaser and is completing corrective actions to allow Site redevelopment as an industrial hemp processing facility.

The Site is comprised of one, 0.98-acre parcel, located at 202 Bay Street in a mixed-use district in the Town of St. Johnsbury, Vermont (Figure 2). The Site was developed by the early 1900s as a retailer of grain and coal. Grain and coal arrived at the Site by a rail spur. Grain was brought to hoppers using a grain elevator powered by an electric motor. The building was designed to hold, mix, and distribute 150 tons of grain. Coal was brought to the coal hoppers from the elevated rail spur. Six buildings remain on-Site including a former grain elevator and storage building, coal hoppers shed, former grist mill, former retail and storage building ("L" building), former office building, and a carriage shed. The Site is bound to the north by the St. Johnsbury Paper Company, the west by a railroad corridor, the east by Bay Street, RK Miles lumber storage yard and lumber retail store, and a bike pavilion associated with the Lamoille Valley Rail Trail, and to the south by an RK Miles lumber storage building.

Since the closure of the grain mill, the Site buildings have been leased for various personal and commercial purposes, such as for storage, operation of a machine shop, an antique shop, storage, shop space for construction contractors, a shop for a board game company, offices, auction house storage, general storage space, an indoor BMX bicycle park, and storage of snow removal equipment, including bulk sand and road salt. Zion Growers recently acquired the Site and plan to redevelop the "L" building has an industrial hemp processing facility. This will require demolition of a former office building (building #1) for construction of loading docks and parking.

A Phase II Environmental Site Assessment (ESA) performed in 2021 at the Site identified vapor intrusion of volatile organic compounds (VOCs) within the "L" building, polycyclic aromatic hydrocarbons (PAHs), metals, and total petroleum hydrocarbons (TPH) exceeding Vermont Soil Standards (VSS) within fill soils, and petroleum-related VOCs in soil and groundwater at concentrations exceeding VSS and Vermont Groundwater Enforcement Standards (VGES), respectively. This Partial CAP has been prepared in accordance with §35-606 of the Vermont Department of Environmental Conservation's (VT DEC) Investigation and Remediation of Contaminated Properties Rule (IRule) to prevent the risk of exposure to Site users through the following pathways:

- 1) Inhalation of VOC contaminated indoor air in the former retail and storage building, hereafter referred to as the "L" building, as a result of vapor intrusion,
- 2) Direct contact with subsurface soil VOC, TPH, and benzo(a)pyrene contamination resulting from releases from a former 500-gallon gasoline underground storage tank (UST),
- 3) Direct contact with PAH, lead, and arsenic contaminated surface soil, and

- 
- 4) Direct contact with containers of petroleum and potentially hazardous materials and associated stained surface soil.

Two sub-slab depressurization (SSD) systems will be constructed in the “L” building to mitigate vapor intrusion of VOCs. The SSD systems induce a negative pressure in the sub-slab environment relative to indoor air. Under these conditions, vapor intrusion cannot occur. Following SSD system startup, quarterly monitoring will be conducted by a qualified environmental professional (QEP) for one year to ensure system efficacy. The Site owner will be responsible for SSD system operation and maintenance after QEP monitoring ceases for as long as there is a risk of vapor intrusion into the “L” building. If VOCs are not detected in SSD system influent at concentrations above Vermont Vapor Intrusion Standards for two consecutive years, the SSD systems may be operated passively (fans turned off).

Groundwater and soil contamination associated with releases from the former 500-gallon gasoline UST requires additional assessment to define the downgradient extent of VOCs and feasibility of in-situ remediation technologies. A separate CAP will be prepared to address groundwater and soil contamination relative to the former UST after data gaps have been filled.

Section 3.7 of the CAP has been prepared as a Soil Management Plan in accordance with §35-804 of the IRule to ensure proper management of PAH, lead, arsenic, and TPH contaminated soil during Site redevelopment. Except as noted above for the UST area of concern, soils containing these contaminants of concern at concentrations exceeding Vermont urban background and/or non-resident soil standards will be excavated for off-Site disposal at a Subtitle D landfill.

A floor drain system in the “L” building will be closed in accordance with Vermont’s Underground Injection Control (UIC) rules. Universal wastes present throughout the Site will be consolidated, inventoried, and properly disposed of.

Remedial activities will commence upon final approval of this Partial CAP, which is estimated to be by May 30, 2022, and will require up to six months to complete. SSD system installation, floor drain closure, and universal waste disposal will be performed during “L” building renovations. Soil management will occur during construction of the parking lot north of the “L” building.

---

# Partial Corrective Action Plan: 202 Bay Street, St. Johnsbury, Vermont, SMS #20204966

---

Cover Photo:  
202 Bay Street,  
St. Johnsbury,  
Vermont. Photo  
taken by Stone  
Environmental,  
Inc. December 2,  
2020.

## Contents

|                                                                                                       |            |
|-------------------------------------------------------------------------------------------------------|------------|
| <b>Acknowledgements .....</b>                                                                         | <b>ii</b>  |
| <b>Title and Approval Page.....</b>                                                                   | <b>iii</b> |
| <b>Executive Summary .....</b>                                                                        | <b>iv</b>  |
| <b>1. Introduction.....</b>                                                                           | <b>9</b>   |
| 1.1. Site Description .....                                                                           | 9          |
| 1.2. Site History .....                                                                               | 10         |
| 1.3. Proposed Redevelopment .....                                                                     | 11         |
| 1.4. Previous Environmental Investigations .....                                                      | 11         |
| 1.4.1. 2011 Area Wide Assessment, Bay Street Area .....                                               | 11         |
| 1.4.2. 2021 Phase I ESA .....                                                                         | 12         |
| 1.4.3. 2021 Phase II ESA .....                                                                        | 13         |
| 1.4.4. 2022 Supplemental Site Investigation and Evaluation of Corrective Action<br>Alternatives ..... | 13         |
| <b>2. Conceptual Site Model .....</b>                                                                 | <b>15</b>  |
| 2.1. Topography.....                                                                                  | 15         |
| 2.2. Geology.....                                                                                     | 15         |
| 2.2.1. Bedrock.....                                                                                   | 15         |
| 2.2.2. Surficial Material.....                                                                        | 15         |
| 2.2.3. Hydrology and Hydrogeology .....                                                               | 16         |
| 2.3. Release Mechanisms and Contaminant Distribution .....                                            | 16         |
| 2.3.1. PAHs/SVOCs .....                                                                               | 17         |
| 2.3.2. Metals.....                                                                                    | 17         |
| 2.3.3. VOCs .....                                                                                     | 17         |
| 2.3.4. TPH .....                                                                                      | 19         |
| 2.4. Sensitive Receptor Evaluation .....                                                              | 19         |
| 2.4.1. Nearby Sensitive Receptors .....                                                               | 20         |
| <b>3. Partial Corrective Action Plan .....</b>                                                        | <b>22</b>  |
| 3.1. Performance Standards .....                                                                      | 22         |
| 3.1.1. Vapor Intrusion Standards .....                                                                | 22         |
| 3.1.2. Soil Standards .....                                                                           | 23         |
| 3.1.3. Corrective Action Objectives .....                                                             | 23         |
| 3.1.4. Permitting .....                                                                               | 24         |
| 3.2. Redevelopment and Reuse Plan .....                                                               | 24         |
| 3.3. Basis of Design and Remedial Construction Plan.....                                              | 24         |
| 3.4. Erosion Control Measures .....                                                                   | 24         |
| 3.5. SSD System .....                                                                                 | 24         |
| 3.5.1. SSD System Startup .....                                                                       | 26         |

|                                                                 |    |
|-----------------------------------------------------------------|----|
| 3.6. Soil Management Plan .....                                 | 26 |
| 3.6.1. PAHs, Arsenic, and TPH-DRO .....                         | 26 |
| 3.6.2. Gasoline Impacted Soil .....                             | 27 |
| 3.6.3. Development Soils .....                                  | 27 |
| 3.7. Container Disposal .....                                   | 28 |
| 3.8. Floor Drain Closure .....                                  | 28 |
| 3.9. Quality Assurance Control Plan .....                       | 28 |
| 3.10. Investigation Derived Waste Plan .....                    | 29 |
| 3.11. Institutional Control Plan .....                          | 29 |
| 3.12. Long-Term Monitoring and Operations and Maintenance ..... | 29 |
| 3.13. Health and Safety .....                                   | 30 |
| 3.14. Reporting .....                                           | 30 |
| 3.15. Schedule and Contracting .....                            | 31 |
| 3.16. Cost .....                                                | 31 |
| 4. References .....                                             | 33 |
| Appendix A: Figures .....                                       | 34 |
| Appendix B: Tables .....                                        | 52 |
| Appendix C: Detailed Cost Estimate .....                        | 88 |
| Appendix D: SSD System Operations and Maintenance Plan .....    | 91 |

## List of Figures

|                                                                           |    |
|---------------------------------------------------------------------------|----|
| Figure 1: Location Map .....                                              | 35 |
| Figure 2: Vicinity Map .....                                              | 36 |
| Figure 3: Site Map .....                                                  | 37 |
| Figure 4: VOC and SVOC Concentrations in Soil .....                       | 38 |
| Figure 5: Metals Concentrations in Soil .....                             | 39 |
| Figure 6: VOC and SVOC Concentrations in Groundwater – Phase II ESA ..... | 40 |
| Figure 7: VOCs in Groundwater – SSI .....                                 | 41 |
| Figure 8: Naphthalene and PCE Concentrations in Soil Gas .....            | 42 |
| Figure 9: SSD Pilot Test Results .....                                    | 43 |
| Figure 10: A-A <sup>1</sup> cross section .....                           | 44 |
| Figure 11: B-B <sup>1</sup> cross section .....                           | 45 |
| Figure 12: Redevelopment Plan .....                                       | 46 |
| Figure 13: L Building Floor Plan – First Floor .....                      | 47 |
| Figure 14: L Building Floor Plan – Second Floor .....                     | 48 |
| Figure 15: SSD System Layout .....                                        | 49 |
| Figure 16: SSD System Details .....                                       | 50 |
| Figure 17: Soil Management Plan .....                                     | 51 |

## List of Tables

|                                                                      |    |
|----------------------------------------------------------------------|----|
| Table 1: 2011 AWA Summary – 202 Bay Street .....                     | 12 |
| Table 2: Release Mechanisms and Contaminants of Concern by REC ..... | 16 |
| Table 3: Sensitive Receptor Evaluation .....                         | 19 |
| Table 4: Adjoining Property Owners .....                             | 20 |
| Table 5: Sensitive Ecological Areas .....                            | 21 |
| Table 6: Site Contaminants of Concern – Soil Vapor .....             | 22 |
| Table 7: Site Contaminants of Concern – Indoor Air .....             | 23 |
| Table 8: Materials of Construction .....                             | 24 |
| Table 9: Excavation Summary .....                                    | 26 |
| Table 10: Development Soil Summary – Near-Term Redevelopment .....   | 28 |
| Table 11: Proposed Schedule .....                                    | 31 |

---

Table 12: Proposed Contractors ..... 31

Table 13: 202 Bay Street CAP Cost Summary ..... 32

---

# 1. Introduction

---

Stone Environmental, Inc. (Stone) has prepared this Partial Corrective Action Plan (CAP) for the Zion Growers property located at 202 Bay Street in St. Johnsbury, Vermont (the Site; Figure 1 in Appendix A). The CAP was prepared for Zion Growers and the Northeastern Vermont Development Association (NVDA) who is providing funding for environmental assessment and remedial planning. Zion Growers enrolled in Vermont's Brownfields Reuse and Environmental Liability Limitation Act (BRELLA) program on March 16, 2021 as a *bona fide* prospective purchaser and is completing corrective actions to allow Site redevelopment as an industrial hemp processing facility. This Partial CAP has been prepared in accordance with §35-606 of the Vermont Department of Environmental Conservation's (VT DEC) Investigation and Remediation of Contaminated Properties Rule (IRule) to prevent the risk of exposure to Site users through the following pathways:

- 1) Inhalation of volatile organic compound (VOC) contaminated indoor air in the former retail and storage building, hereafter referred to as the "L" building, as a result of vapor intrusion,
- 2) Direct contact with subsurface soil VOC, total petroleum hydrocarbon (TPH), and benzo(a)pyrene contamination resulting from releases from a former 500-gallon gasoline underground storage tank (UST),
- 3) Direct contact with polycyclic aromatic hydrocarbon (PAH), lead, and arsenic contaminated surface soil, and
- 4) Direct contact with containers of petroleum and potentially hazardous materials and associated stained surface soil.

Groundwater contamination associated with releases from the former 500-gallon gasoline UST requires additional assessment to define the downgradient extent of VOCs and feasibility of in-situ remediation technologies. A separate CAP will be prepared to address groundwater contamination after data gaps have been filled.

Section 3.7 of the CAP has been prepared as a Soil Management Plan in accordance with §35-804 of the IRule to ensure proper management of PAH, lead, and arsenic contaminated soil during Site redevelopment.

A floor drain system in the "L" building should be closed in accordance with Vermont's Underground Injection Control (UIC) rules.

## 1.1. Site Description

The Site is located at approximately 44.418593° north latitude and - 72.014394° west longitude at an elevation of approximately 557 feet above sea level in the Town of St. Johnsbury, Caledonia County, Vermont (Figure 1 in Appendix A). The Site is comprised of one, 0.98-acre parcel, located at 202 Bay Street and is depicted on Figure 2, Vicinity Map (Appendix A). The Site is identified with the Town of St. Johnsbury as Parcel #1V010021. The current Site owner is Zion Growers:

---

Brandon McFarlane / Owner, CEO  
Zion Growers  
74 Mountain Avenue, St. Johnsbury, Vermont 05819  
(561) 703-9481  
[ziongrowers@gmail.com](mailto:ziongrowers@gmail.com)

The Site is in a commercial area in the Town of St. Johnsbury and is zoned in a mixed-use district. The Site is bound to the north by the St. Johnsbury Paper Company, the west by a railroad corridor, the east by Bay Street, RK Miles lumber storage yard and lumber retail store, and a bike pavilion associated with the Lamoille Valley Rail Trail, and to the south by an RK Miles lumber storage building. The surrounding community is comprised of various commercial and light industrial businesses.

Six buildings are currently located on the Site, including a former grain elevator and storage building, coal hoppers shed, former grist mill, former retail and storage building, former office building, and a carriage shed (Figure 3, Appendix A). Several of the buildings are served by municipal water and sewer. Electrical service to the Site buildings is provided by pole mounted electrical utilities located along Bay Street to the east. An asphalt paved parking lot provides access from Bay Street, with a gravel driveway providing access to the coal hoppers shed. Buildings on the Site are further described as follows:

Building #1 - Former Office Building: A two-story wood framed building with wooden siding. The building is leased to the American Game Table Company, a manufacturer of wooden board game tables, and used as a workshop. The second floor contains an unfinished living space.

Building #2 - Carriage Shed: Two wooden carriage sheds are occupied by a timber framing contractor and are utilized for the storage of timbers and building materials. Former above-ground storage tank (AST) cradle foundations are present in the northern exterior walls of the carriage shed; the former ASTs were used to store maple syrup and molasses.

Building #3 - Former retail and storage building known as the “L” building: A two story, wood framed structure with aluminum siding. The first floor of the building is leased to a general contractor, who utilizes the space for storage and as a workshop, and an auction house, which utilizes the area for storage. The second floor is vacant.

Building #4 - Former Grist Mill: A four story concrete block building with a cut-stone façade. The first floor is leased for storage, while the upper floors are in disrepair.

Building #5 - Former grain elevator and storage building: An eight story, wood-framed building with aluminum siding and an attached grain silo. At the time of the Site walk, the building was vacant, with lower floors being used for storage of grain equipment, such as hand trucks, and household goods.

Building #6 - Coal Hoppers Shed: A wooden structure containing eight, concrete-lined bays situated below an elevated railroad spur. Several of the bays are leased and are used for storage of construction equipment, snow removal equipment, and bulk road salt and sand.

## 1.2. Site History

According to historical records reviewed and interviews with the Site owner completed during the Phase I ESA (Stone, 2021a), the Passumpsic River was moved east circa 1895 and Site buildings were constructed on fill materials used to infill the historic river channel. The Site was developed by the early 1900s as a retailer of grain and coal. Grain and coal arrived at the Site by a rail spur. Grain was brought to hoppers using a grain

---

elevator powered by an electric motor. The building was designed to hold, mix, and distribute 150 tons of grain. Coal was brought to the coal hoppers from the elevated rail spur.

Since the closure of the grain mill, the Site buildings have been leased for various personal and commercial purposes, such as for storage, operation of a machine shop, an antique shop, storage, shop space for construction contractors, a shop for a board game company, offices, auction house storage, general storage space, an indoor BMX bicycle park, and storage of snow removal equipment, including bulk sand and road salt.

### 1.3. Proposed Redevelopment

Zion Growers plans to redevelop the Site as an industrial hemp processing facility, located primarily within the “L” building. “L” building renovations will include removing interior partitions, improving the building envelope, and structural improvements. Hemp processing equipment and offices will be located on the first floor while the second floor will be used for storage of hemp bales. Two pole barns and building #1 in the northern portion of the property will be demolished and the ground surface regraded to accommodate parking and a truck loading dock. Redevelopment plans for remaining Site buildings have not been determined.

### 1.4. Previous Environmental Investigations

A summary of previous environmental investigations at Site is provided below. Previous sample locations and results are depicted on Figures 4 through 11 (Appendix A). Analytical data from previous environmental investigations is tabulated in the following Appendix B tables:

- Table B-1: Volatile Organic Compound Analytical Results – Soil Samples
- Table B-2: Semi-Volatile Organic Compound Analytical Results - Soil Samples
- Table B-3: Priority Pollutant Metals Analytical Results - Soil Samples
- Table B-4: Polychlorinated Biphenyl Analytical Results – Soil Samples
- Table B-5: Herbicide Analytical Results – Soil Samples
- Table B-6: Total Petroleum Hydrocarbon Analytical Results – Soil Samples
- Table B-7: Volatile Organic Compound Analytical Results - Groundwater Samples
- Table B-8: Semi-volatile Organic Compound Analytical Results - Groundwater Samples
- Table B-9: Priority Pollutant Metals Analytical Results - Groundwater Samples
- Table B-10: Soil Gas Sample Analytical Results
- Table B-11: Polychlorinated Biphenyl Analytical Results – Porous Building Materials
- Table B-12: Polychlorinated Biphenyl Analytical Results – Non-Porous Building Materials
- Table B-13: Polychlorinated Biphenyl Analytical Results – Bulk Oil
- Table B-14: Volatile Organic Compound Indoor Air Sample Analytical Results
- Table B-15: TCLP Pesticides and Herbicides Results - Soil Samples
- Table B-16: TCLP Metals Analytical Results - Soil Samples
- Table B-17: TCLP Semi Volatile Organic Compounds Analytical Results - Soil Samples
- Table B-18: TCLP Volatile Organic Compounds Analytical Results - Soil Samples
- Table B-19: Waste Characteristics – Soil Samples
- Table B-20: Polychlorinated Biphenyl Analytical Results - Indoor Air Samples

#### 1.4.1. 2011 Area Wide Assessment, Bay Street Area

In December 2011, Stone completed an area wide assessment (AWA) of the Bay Street Area Project in St. Johnsbury, Vermont. The AWA was completed to provide a preliminary evaluation of environmental conditions and potential environmental concerns within the assessment area, which included 41 industrially

zoned properties along Bay Street, including the Site. Based on a review of historical Site documentation, interview with the Site owner, and a Site inspection, Stone identified the following Recognized Environmental Conditions (RECs) and contaminants of concern associated with the Site:

**Table 1: 2011 AWA Summary – 202 Bay Street**

| REC # | Location                           | Description                                                                                                                                                                                           | Contaminants of Concern                                                           |
|-------|------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------|
| 1     | Coal Shed                          | A rail spur leads cars to this structure for receipt of coal to hoppers located below this building                                                                                                   | PAHs                                                                              |
| 2     | Grain Elevator                     | Containers within grain elevator building                                                                                                                                                             | Petroleum, PAHs                                                                   |
| 3     | Grain silo/storage areas           | Possible fumigant uses within grain storage areas                                                                                                                                                     | Carbon tetrachloride.<br>Small quantities of petroleum lubricants, solvents, etc. |
| 4     | Sitewide                           | Site Maintenance activities                                                                                                                                                                           |                                                                                   |
| 5     | Grain Elevator                     | Freight elevators within grain elevator building and former retail space                                                                                                                              | Petroleum lubricants, PCBs.                                                       |
| 6     | Carriage shed                      | Hazardous materials containers within carriage shed                                                                                                                                                   | VOCs, PAHs                                                                        |
| 7     | Exterior                           | 55-gallon drums along rail line embankment                                                                                                                                                            | Unknown<br>VOCs, PAHs, pentachlorophenol, metals, herbicides                      |
| 8     | Sitewide                           | Location adjacent rail yard                                                                                                                                                                           |                                                                                   |
| 9     | Former retail and storage building | Machine shop located at Site has been in operation at the site for 11 years. Solvent wash tanks are maintained by an industrial service provider. Chlorinated solvents have not been used at the Site | Petroleum solvents                                                                |

Notes: PAHs – polycyclic aromatic hydrocarbons; PCBs – polychlorinated biphenyls; VOCs – volatile organic compounds

#### 1.4.2. 2021 Phase I ESA

Stone completed a Phase I Environmental Site Assessment (ESA) of the Site on January 26, 2021, in accordance with the *Standard Practice for Environmental Site Assessments: Phase I ESA Assessment Process*, published by ASTM International as Standard Practice E1527-13. The Phase I ESA was performed on behalf of the VT DEC and Zion Growers. Zion Growers was performing environmental due diligence as a *bona fide* prospective purchaser of the Site. RECs identified by the Phase I ESA include:

- REC #1: Historic industrial practices and remaining evidence of these practices at the Site including coal and grain storage and machining with oil-staining on building materials adjacent to grain elevator equipment.
- REC #2: Proximity to historic and active rail lines, including the presence of a rail spur on the Site.
- REC #3: Presence of unsecured petroleum and potentially hazardous substance containers throughout the Site, some exhibiting evidence of releases.
- REC #4: Presence of empty and degraded 55-gallon drums on the Site near a rail embankment.
- REC #5: Reported removal of a 500-gallon gasoline underground storage tank from the Site at least thirty years ago.
- REC #6: Occurrence of benzene contamination in groundwater at concentrations exceeding Vermont Groundwater Enforcement Standards (VGES) on the adjoining KNTT Investments property.
- REC #7: Location of the Site as hydraulically downgradient of several State of Vermont Hazardous Waste Sites.
- REC #8: Importation of fill from an unknown source at the time of Site development.

---

#### 1.4.3. 2021 Phase II ESA

Stone completed a Phase II ESA of the Site on June 2 and July 7, 2021, which included soil, groundwater, and sub-slab soil gas assessments. The results of the Phase II ESA indicate that the approximate upper 18-inches of fill soils contain PAHs at concentrations above non-resident VSS and below urban background levels except for an area of coal refuse located west of the “L” building and stained soils associated with a degraded 55-gallon drum located near the southwest corner of the “L” building. PAH concentrations in these locations exceed non-resident VSS and arsenic is present in coal refuse at concentrations exceeding the statewide background. Lead was identified in coal refuse and one soil sample north of the “L” building at concentrations below non-resident VSS but above the resident VSS. Total petroleum hydrocarbons-diesel range organics (TPH-DRO) is present in stained surface soil near a degraded 55-gallon drum located north of the “L” building at concentrations exceeding Vermont non-resident soil screening values. VOCs and TPH-gasoline range organics (TPH-GRO) were identified in soil near the former 500-gallon gasoline UST at concentrations exceeding VSS. VOCs and the PAH, benzo(a)pyrene, were detected in groundwater near the former UST at concentrations above their respective VGES. Tetrachloroethylene (PCE) and naphthalene were detected in sub slab soil gas at concentrations exceeding Vermont’s non-resident vapor intrusion standards (VIS) below the former office (PCE) and “L” buildings (naphthalene). No PCBs were detected during investigation of a release of lubricating and hydraulic oils to building materials.

#### 1.4.4. 2022 Supplemental Site Investigation and Evaluation of Corrective Action Alternatives

A Supplemental Site Investigation (SSI) was completed in February and March, 2022 and included a sub-slab depressurization (SSD) system pilot test within the “L” building to evaluate the efficacy of this technology to mitigate vapor intrusion, additional delineation of VOCs in soil vapor, collection of soil samples to support soil management planning, evaluation of a floor drain system in the “L” building, delineation of VOCs in groundwater downgradient of the former gasoline UST, and an evaluation of PCBs in indoor air. Results of the SSI field work indicated the following:

- Vacuum induced during the SSD pilot testing had good propagation below the slab, indicating that this technology would be effective to mitigate vapor intrusion into the “L” building. High volume samples collected from pilot test effluent did not detect VOCs at concentrations greater than Vermont’s Vapor Intrusion Standards (VIS) for sub-slab soil gas.
- PCE and naphthalene were not detected in soil vapor samples collected from the northern portion of the Site at concentrations exceeding non-resident VIS.
- Evaluation of the floor drain system revealed that the floor drain discharges to a pit in the northwest portion of the “L” building. The pit is constructed as a concrete vault with no outlet.
- The downgradient extent of VOCs in groundwater, specifically 1,2,4-trimethylbenzene and naphthalene have not been defined. Both VOCs were detected in monitoring well MW-2 at concentrations exceeding VGES.
- Several potentially PCB-containing building materials were identified in the “L” building and former grain elevator building. PCBs were not detected in any indoor air samples.

Based on the cumulative results of the SSI and previous environmental investigations, Stone prepared an Evaluation of Corrective Action Alternatives (ECAA) in accordance with §35-604 of the IRule. The ECAA evaluated remedial alternatives to mitigate exposure to contaminated indoor air through vapor intrusion and corrective actions for the gasoline UST release. Remedial alternatives were subjected to a comparative analysis of their appropriateness for mitigating inhalation risk to known Site contaminants and their protectiveness to human health and the environment. Remedial alternatives considered for vapor intrusion mitigation into the “L” building included 1) Alternative 1: No Action, 2) Alternative 2: Apply epoxy-based resin material over the concrete floor slab, 3) Alternative 3: Install an SSD system, and 4) Alternative 4: Source removal. Remedial

---

alternatives considered for soil and groundwater contamination associated with the former 500-gallon UST included 1) Alternative 1: No action, 2) Alternative 2: Monitored natural attenuation, 3) Alternative 3: Source removal via excavation and off-Site disposal, and 4) Alternative 4: In-situ remediation.

Based on the results of the ECAA, the recommended corrective for vapor intrusion into the “L” building was Alternative 3, the installation of an SSD system. The recommended corrective action for soil and groundwater contamination related to the former 500-gallon gasoline UST was Alternative 4, in-situ remediation, which will require additional assessment prior to inclusion in a CAP.

---

## 2. Conceptual Site Model

---

The following Conceptual Site Model (CSM) provides a set of working hypotheses that describe key aspects of the Site. The CSM includes a discussion of the physical, geologic, and hydraulic attributes of the Site and surrounding area, how chemicals were released at the Site, their transport pathways, fate mechanisms, and potential routes of exposure to ecological and human receptors. The CSM provides the context from which the site investigation is developed and a framework to make sound Site management decisions.

### 2.1. Topography

The Site is situated approximately 557 feet above mean sea level and is located approximately 275 feet east of the Passumpsic River. Topography at the Site is generally flat, with an embankment on the western portion of the Site along the railroad corridor. Topography in the vicinity of the Site slopes gently to the east towards the Passumpsic River. The area has undergone significant man-made alterations (Stone, 2021b).

### 2.2. Geology

#### 2.2.1. Bedrock

Bedrock outcrops have not been observed at the Site during environmental investigations completed from 2020 through 2022. According to the Bedrock Geologic Map of Vermont (Ratcliffe, et al., 2011), bedrock below the Site is mapped as a phyllite and metalimestone of the Waits Formation. This is further described as dark gray to silvery-gray, lustrous, carbonaceous muscovite-biotite-quartzite phyllite containing abundant beds of punky-brown-weathering, dark-bluish-gray micaceous quartz-rich limestone in beds ranging from 10 centimeters to 10 meters thick. Bedrock was not encountered while advancing soil borings during the Phase II ESA at a maximum exploratory depth of twenty feet bgs (SB-6). Direct push drilling refusals were encountered at depths from 15 to 16.5 feet bgs during installation of monitoring wells east of the Site in 2022. Refusal on bedrock was not confirmed and depth to bedrock at the Site is unknown.

#### 2.2.2. Surficial Material

According to the Surficial Geologic Map of Vermont (Doll, Ed., 1970), native unconsolidated soils at the Site are mapped as recent alluvium. Based on a review of Sanborn fire insurance maps, the area has undergone significant man-made alterations. Between 1884 and 1900 a large bend of the Passumpsic River, adjacent to Portland Street, was in-filled to make room adjacent to the rail yard for the E.T. & H.K. Ide grain elevator and surrounding businesses.

Soils recovered from soil borings advanced during the Phase II ESA included fill, wetland/lowland, alluvium, and stream channel deposits. Sand and gravel fill was encountered from ground surface to depths ranging between approximately two (SB-3 and -4) and six feet (SB-1 and -7) bgs. The upper approximate 18-inches of sand and gravel fill often contained ash and brick rubble, especially in the northern portion of the Site. Coal refuse was observed to six feet bgs below former coal sheds (SB-2). Fill materials were observed to depths up to ten feet bgs in MW-4 during the SSI. MW-4 is located east of the Site where more significant infilling is likely from filling of the former river channel. Sand and gravel fill was underlain by well sorted fine sand

fining downwards to sandy silt with peat and fine sand lenses to depths ranging between approximately eleven (SB-1) and sixteen (SB-6) feet bgs. We interpret the sand in this stratigraphic sequence to represent alluvium overlaying riparian wetland deposits. Peat lenses, which were more prevalent in soil borings on the western side of the Site (SB-1, -3, and -4), were likely deposited in wetlands formerly adjacent to the Passumpsic River. Sandy silt with peat was in turn underlain by fine sand coarsening downward to poorly sorted gravel and cobbles. Fine sand in this sequence is likely alluvium deposited on the side of the river channel and overlying coarser channel deposits.

### 2.2.3. Hydrology and Hydrogeology

On February 23, 2022, elevations of potentiometric surface in Site groundwater monitoring wells, relative to an assigned Site datum, ranged from 89.96 feet at PZ-6 to 89.31 feet at MW-3. Based on these groundwater elevations, the direction of groundwater flow is to the east towards the Passumpsic River, which is located approximately 275 feet east of the Site and flows in a north to south direction.

## 2.3. Release Mechanisms and Contaminant Distribution

Release mechanisms for known Site contaminants of concern based on RECs identified in the 2021 Phase I ESA are summarized in Table 2, below, and discussed in the following subsections.

*Table 2: Release Mechanisms and Contaminants of Concern by REC*

| REC # | Description                                                                                                                                                                                                      | Release Mechanisms                                                                                                                                                                                                                | Contaminants of Concern | Impacted Media                                                                                                                  |
|-------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|---------------------------------------------------------------------------------------------------------------------------------|
| 1     | Historic industrial practices and remaining evidence of these practices at the Site including coal and grain storage and machining with oil-staining on building materials adjacent to grain elevator equipment. | Coal storage                                                                                                                                                                                                                      | PAHs and Metals         | Shallow soil                                                                                                                    |
|       |                                                                                                                                                                                                                  | Spills (none known) and atmospheric deposition of coal ash from rail spur operation                                                                                                                                               | PAHs and Metals         | Shallow soil                                                                                                                    |
|       |                                                                                                                                                                                                                  | Use of petroleum and hazardous materials in industrial practices                                                                                                                                                                  | VOCs and SVOCs          | Soil and soil vapor                                                                                                             |
| 2     | Proximity to historic and active rail lines, including the presence of a rail spur on the Site.                                                                                                                  | Spills (none known) and atmospheric deposition of coal ash from rail spur operation                                                                                                                                               | PAHs and Metals         | Soil                                                                                                                            |
| 3     | Presence of unsecured petroleum and potentially hazardous substance containers throughout the Site, some exhibiting evidence of releases.                                                                        | Improper handling, storage, and potential disposal of petroleum and hazardous material containers resulting in releases to the ground surface, stormwater catchments, or floor drain system in former retail and storage building | TPH                     | Shallow soil – extent of impacts is <i>de minimis</i> . Presence of unsecure containers present a material threat of a release. |
| 4     | Presence of empty and degraded 55-gallon drums on the Site near a rail embankment.                                                                                                                               | Potential release of petroleum and/or hazardous materials from improperly stored drums                                                                                                                                            | TPH                     | Shallow soil – extent of impacts is <i>de minimis</i> . Presence of unsecure containers present a material threat of a release. |
| 5     | Reported removal of a 500-gallon gasoline underground storage tank from the Site at least thirty years ago.                                                                                                      | Leaks in the UST or piping could result in a release of gasoline to the subsurface                                                                                                                                                | VOCs, TPH, PAHs         | Soil and groundwater                                                                                                            |
| 6     | Occurrence of benzene contamination in groundwater at concentrations exceeding VGES on the adjoining KNTT Investments property.                                                                                  | Leaks from the former 500-gallon gasoline UST system                                                                                                                                                                              | VOCs                    | Soil and groundwater                                                                                                            |

---

Notes: PAHs – polycyclic aromatic hydrocarbons; PCBs – polychlorinated biphenyls; VOCs – volatile organic compounds; SVOCs – semi-volatile organic compounds

### **2.3.1. PAHs/SVOCs**

PAHs are generated during the incomplete combustion of organic material, such as coal, petroleum products, and wood. PAHs are commonly found in surface soil in areas of cities and towns with long industrial histories and near railroad corridors. The Site has been in industrial use since approximately 1900, is in an industrialized area of St. Johnsbury, is adjacent to a railroad line, and historically operated a rail spur for bulk coal and grain storage. Atmospheric deposition of coal ash is common along rail lines. Fills soils used to infill the Passumpsic River corridor circa 1895 could have resulted in the importation of PAHs to the Site.

The upper approximate 18-inches of fill soils were observed to contain ash east of the coal sheds (SB-3) and in the area between the former carriage sheds and former office building (SB-1). PAHs, expressed as a toxicity equivalent to benzo(a)pyrene, are present in these soils at concentrations exceeding non-resident VSS. PAHs at concentrations above resident VSS are more widespread in shallow soil across the Site. Coal refuse, containing PAHs exceeding non-resident VSS, is present to at least six feet bgs along the western Site boundary near the historic rail spur. Except for naphthalene, PAHs are not present at concentrations exceeding VSS in underlying sandy fill or native soils.

Naphthalene was detected in soils throughout soil boring SB-6 resulting from a release from the former gasoline UST. The release from the former gasoline UST has also resulted in impacts to groundwater indicated by detections of benzo(a)pyrene and naphthalene in groundwater collected from PZ-6 with concentrations exceeding their respective VGES. The extent of PAH soil and groundwater contamination associated with the gasoline release has not been defined.

Odors associated with liquids in the former retail and storage building floor drain system have not been tested for Site contaminants of concern, except for VOCs. There does not appear to be an outlet from the pit associated with the floor drain.

### **2.3.2. Metals**

The Site's location in an industrial setting and potential use of contaminated fill, as described above for PAHs, could have also resulted in metal contamination at the Site. Additionally, the improper handling, storage, and potential disposal of petroleum and hazardous material containers could have resulted in releases of metals to the ground surface. Evidence of improper storage and disposal of these types of containers was observed during the Phase I ESA and included containers surrounded by stained soil and a pile of empty and degraded 55-gallon drums near the rail line.

Former industrial practices at the Site have not resulted in widespread metals contamination to soil or groundwater. Arsenic is present in coal refuse sampled near the rail spur on the western Site boundary (SB-2) at a concentration above the Vermont statewide background value. This is due to the natural occurrence of arsenic in coal. Lead was detected in two samples at concentrations above the resident VSS. These samples included coal refuse (SB-2) and shallow soil near the former carriage shed (SB-1) containing coal rubble.

The former retail and storage building floor drain system has not been assessed for metals contamination.

### **2.3.3. VOCs**

Current and past Site practices include the use and storage of hazardous substances, chlorinated solvents, and petroleum products. Petroleum and hazardous materials containers are evident at the Site and release(s) to the ground surface, building materials, and odors in a Site floor drain system were assessed. Past site practices

---

have not resulted in widespread VOC contamination at the Site based on non-detects in soil samples (SB-3, SB-4, SL-1, and SL-2) and a liquid sample (FD-080121) and the absence of visual, olfactory, and elevated PID readings.

The presence of naphthalene below the “L” building (SV-2) and PCE below the former office building (SV-1) indicate that releases of petroleum and chlorinated solvents likely occurred at or near these locations. The presence of naphthalene and PCE in sub-slab soil gas and indoor air in both buildings at concentrations above non-resident VIS and IAS, respectively, indicates the vapor intrusion pathway is complete and indoor air is impacted. The floor drain system includes a concrete-lined pit that contains liquids that have a petroleum odor. There does not appear to be an outlet from the floor drain system, which likely limits subsurface impacts. The extent of PCE and naphthalene soil vapor contamination is limited to below the northern portion of the “L” building and the former office building. The northern portion of the “L” building is currently unheated, and the building envelope is uninsulated and drafty. Vapor intrusion into the “L” building may be exacerbated when the “L” building is improved with a tighter envelope and is heated. Heating buildings creates a “stack effect” where sub-slab vapors are more easily drawn into buildings as make-up air for heating equipment.

Release mechanisms for chloroform related to current or historic Site activities has not been identified. Chloroform soil vapor contamination has been documented upgradient of the Site associated with former and active dry-cleaning operations at several properties on Eastern Avenue (Stone 2021c). Chloroform is also a disinfecting byproduct of municipal drinking water, which serves the Site. Chloroform has been detected at concentrations exceeding the resident VIS, but less than the non-resident VSS, below the northern portion of the “L” building (SV-2 and -3), below the former office building (SV-1), and exterior areas north and east of the “L” building (SV-11, -12, and -14). Chloroform is not a Site contaminant of concern based on proposed industrial reuse. Corrective actions to address vapor intrusion of PCE and naphthalene into the “L” building would also be protective of chloroform vapor intrusion.

The only groundwater and soil VOC contamination identified at the Site is associated with releases to the subsurface from the former 500-gallon UST. Petroleum VOCs 1,2,4-TMB, 1,3,5-TMB, ethylbenzene, naphthalene, and xylenes are present in soil in the vicinity of the former UST at concentrations exceeding non-resident VSS. Groundwater at this location has also been impacted by the same VOCs and toluene. The extent of VOC soil contamination associated with the former gasoline UST is likely limited to the vicinity of the former UST.

The downgradient extent of dissolved phase 1,2,4-TMB and naphthalene have not been defined as both VOCs were detected in groundwater samples from MW-2, located downgradient of the source area, at concentrations exceeding their respective VGES. However, 1,2,4-TMB and naphthalene concentrations attenuate by one and two orders of magnitude, respectively, between PZ-6 and MW-2. Petroleum-related VOCs will degrade more quickly under aerobic conditions than anaerobic conditions. Based on the low dissolved oxygen and oxidation-reduction potential measured at the Site during the Phase II ESA and SSI, it is unlikely that dissolved phase contamination associated with the Site UST and observed on the former KNTT property will attenuate significantly with time. Naphthalene and 1,2,4-TMB concentrations at MW-2 have increased since 2013 when groundwater samples were previously collected on the former KNTT property. This could be due to minor differences in well locations and construction or indicate that the dissolved phase groundwater plume has not stabilized. Increasing concentrations of these contaminants of concern in MW-2 confirm dissolved phase VOCs are not attenuating significantly with time. The presence of VOCs in MW-2, located east of the source area, suggests that migration of the dissolved phase VOC plume is influenced by coarse fill materials, coarse channel deposits, temporal changes in hydraulic conditions, or a combination of these factors.

There have been documented releases of petroleum and chlorinated VOCs at upgradient properties including the Railroad Street Texaco site and several dry-cleaning sites. The downgradient extent of groundwater and soil vapor contamination resulting from these releases has not been defined. However, based on the results of groundwater assessment at locations on the western side of the Site (PZ-1, -2, and -3), contaminated groundwater and soil vapor does not appear to be migrating onto the Site.

#### 2.3.4. TPH

The release mechanism for TPH is the same as described for VOCs. TPH-DRO is present in oil-stained surface soil adjacent a degraded 55-gallon drum immediately southeast of the former carriage shed (SL-2) at concentrations above non-resident Vermont soil screening values. The extent of TPH contaminated soil has not been delineated but is not likely limited to the extent of stained soil.

TPH-gasoline range organics (GRO) is present in stained soil associated with the former 500-gallon gasoline UST (SB-6) at concentrations exceeding non-resident Vermont soil screening values. As discussed above, the extent of subsurface impacts from the gasoline release have not been defined.

## 2.4. Sensitive Receptor Evaluation

Contamination from Site sources has been evaluated for its potential for adversely affecting sensitive receptors. Table 3 presents the potentially affected media, potential pathways, and potential receptors.

*Table 3: Sensitive Receptor Evaluation*

| Potentially Affected Media | Potential Pathways                                                                               | Sensitive Receptors                                                         | Potential Level of Risk                                                                                                                                                                                                                                          |
|----------------------------|--------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Surface Water              | Overland flow of surface water may erode contaminated soils and transport contamination off-Site | Passumpsic River aquatic biota and recreational users                       | Low – Most of the ground surface is paved or has buildings present.                                                                                                                                                                                              |
|                            | Discharge of contaminated water                                                                  |                                                                             | Medium – The downgradient extent of contaminated groundwater associated with the former gasoline UST has not been defined. Contaminated groundwater may discharge to the Passumpsic River.                                                                       |
| Sediment                   | Deposition of contaminated soil from overland flow of surface water                              | Passumpsic River aquatic biota and recreational users                       | Low – Most of the ground surface is paved or has buildings present.                                                                                                                                                                                              |
| Surface Soil               | Direct contact to contaminated materials                                                         | Trespassers<br>Site Workers<br>Site Users<br>Native biota                   | Medium – Most of the ground surface is paved, has buildings present, or access is restricted by locked fences. However, there is a risk for direct contact with PAH, lead, and arsenic contaminated soils in the north of the former retail and storage building |
| Sub Surface Soil           | Direct contact to contaminated materials                                                         | Future users performing excavations for construction or utility maintenance | High – Intrusive activities near the former gasoline UST are likely to encounter contaminated soil.                                                                                                                                                              |
| Groundwater                | Infiltration of surface water through affected soil may leach contaminants                       | Groundwater users – none known                                              | Low – there are no known users of groundwater                                                                                                                                                                                                                    |
|                            | Leaks from gasoline UST system<br>Releases from the floor drain system                           |                                                                             |                                                                                                                                                                                                                                                                  |
| Air                        | Vapor intrusion of volatile constituents                                                         | Building occupants                                                          | High – The vapor intrusion pathway is complete in the former office building                                                                                                                                                                                     |

| Potentially Affected Media | Potential Pathways                                     | Sensitive Receptors | Potential Level of Risk                                                                                                                      |
|----------------------------|--------------------------------------------------------|---------------------|----------------------------------------------------------------------------------------------------------------------------------------------|
|                            | Indoor air quality due to hazardous building materials |                     | and former retail and storage building based on sub-slab soil vapor and indoor air sample results.                                           |
| Building Materials         | Direct contact to contaminated materials               | Building occupants  | Low – building materials are not contaminated with PCBs as a result of incidental spills of oils. PCBs have not been detected in indoor air. |
|                            | Indoor air quality                                     |                     |                                                                                                                                              |

#### 2.4.1. Nearby Sensitive Receptors

Using the VT ANR Natural Resources Atlas, a qualitative receptor analysis was completed to evaluate the occurrence of potential receptors relative to the Site<sup>1</sup>.

##### 2.4.1.1. Adjoining Landowners

Adjoining landowners to the Site are summarized in Table 4, below. These landowners will receive notification of this Partial CAP at the onset of the 30-day public comment period.

**Table 4: Adjoining Property Owners**

| Address        | Grand List SPAN #                               | Owner Name                       | Contact Information                                                      |
|----------------|-------------------------------------------------|----------------------------------|--------------------------------------------------------------------------|
| 136 Bay Street | 558-176-13236                                   | William and Elizabeth Tremblay   | C/O St Johnsbury Paper Company<br>PO Box 96<br>St. Johnsbury, VT 05819   |
| Not Applicable | 558-176-11970                                   | Maine Central Railroad           | C/O Pan Am Railways<br>1700 Iron Horse Park<br>North Billerica, MA 01862 |
| 249 Bay Street | 558-176-10068<br>558-176-12276<br>558-176-10067 | RK Miles Lumber Company          | 502 North Main Street<br>Barre, VT 05641                                 |
| 311 Bay Street | 558-176-10563                                   | Green Mountain Power Corporation | 2154 Post Road<br>Rutland, VT 05701                                      |
| 195 Bay Street | 558-176-12276                                   | Town of St. Johnsbury            | 51 Depot Square<br>Suite 101<br>St. Johnsbury, VT 05819                  |

##### 2.4.1.2. Drinking Water Supplies

There are no public water supplies and eight private water supply wells within one-half mile of the Site. Private water supply wells are depicted on Figure 2.

##### 2.4.1.3. Surface Water and Groundwater Source Protection Areas

There are no surface water or groundwater source protection areas within one-half mile of the Site.

<sup>1</sup> <http://anrmaps.vermont.gov/websites/anra5/> accessed February 8, 2021.

---

#### 2.4.1.4. *Buildings with Basements*

Data regarding the presence of buildings with basements on adjoining properties is not readily available. We expect that residences nearby the Site have basements.

#### 2.4.1.5. *Wetlands*

According to the ANR Natural Resources Atlas, there is one mapped Class II wetland located approximately 500 feet southeast of the Site adjacent to the Passumpsic River (Figure 2).

#### 2.4.1.6. *Sensitive Ecological Areas*

Sensitive ecological areas, including deer wintering yards (0), habitat blocks (2), significant natural communities (0), VT Fish and Wildlife managed lands (0), Indiana Bat hibernacula (0), and uncommon species (2) were assessed within one-half mile of the Site using the ANR Natural Resources Atlas. Results are provided in Table 5 below.

**Table 5: Sensitive Ecological Areas**

| Resource (ID) | Resource Type     | Distance (feet) from Site | Direction from Site |
|---------------|-------------------|---------------------------|---------------------|
| 753           | Vascular Plant    | 1,980                     | North               |
| 13271         | Vertebrate Animal | Adjoining                 | North               |
| 1364          | Habitat Block     | 975                       | Southeast           |
| 1377          | Habitat Block     | 1,250                     | East                |

---

## 3. Partial Corrective Action Plan

---

This section describes the recommended design elements for installation and operation of SSD systems and management of PAH, lead, arsenic, and TPH-DRO contaminated soil. Corrective actions will be performed by contractors under the supervision of a Qualified Environmental professional (QEP). This cleanup plan has been prepared as a Partial CAP and Soil Management Plan in accordance with the IRule. Implementation of corrective actions shall not commence until approval of this Partial CAP by the VT DEC.

Site buildings have been assessed for lead and asbestos containing material (ACM) separately. Any lead and ACM identified should be abated in accordance with Vermont Regulations for Lead Control and Asbestos Control, respectively, prior to remedial actions.

### 3.1. Performance Standards

Corrective action objectives described within this Partial CAP are designed to mitigate exposure to the following known Site contaminants and exposure pathways:

- 1) Inhalation of VOC contaminated indoor air in the “L” building, as a result of vapor intrusion, and
- 2) Direct contact with PAH, lead, arsenic, and TPH-DRO contaminated soil.

#### 3.1.1. Vapor Intrusion Standards

The basis for vapor intrusion corrective actions at the Site is the complete vapor intrusion pathway that was identified in the 2021 Phase II ESA of naphthalene and PCE into the “L” and former office buildings. The former office building will be demolished during Site redevelopment, removing the vapor intrusion pathway into this structure (sample locations SV-1 and IA-1 in Table 6 and 7, below). Soil vapor samples from the 2021 Phase II ESA and 2022 SSI were compared to resident and non-resident sub-slab soil gas Vapor Intrusion Standards (VIS) included in Appendix § 35-APX-A2 of the IRule. Indoor air samples collected during the 2021 Phase II ESA for VOC analysis were compared to resident and non-resident Indoor Air Standards (IAS) included in Appendix § 35-APX-A2 of the IRule.

While redevelopment of the Site is for non-resident use, the SSD system will mitigate vapor intrusion into the “L” building and be protective of indoor air to residential IAS. Tables 6 and 7, below, summarize resident and non-resident VIS and IAS, respectively, for VOCs that have been detected at concentrations exceeding these standards. Maximum soil vapor and indoor air concentrations are provided. Carbon tetrachloride was removed from the list of contaminants of concern for indoor air since background ambient air concentrations were similar to indoor air concentrations and this VOC was not detected in sub-slab soil vapor.

**Table 6: Site Contaminants of Concern – Soil Vapor**

| Contaminant of Concern | Resident VIS ( $\mu\text{g}/\text{m}^3$ ) | Non-Resident VIS ( $\mu\text{g}/\text{m}^3$ ) | Sample Location | Result ( $\mu\text{g}/\text{m}^3$ ) |
|------------------------|-------------------------------------------|-----------------------------------------------|-----------------|-------------------------------------|
| Benzene                | 4.3                                       | 35                                            | SV-1            | 15                                  |
| Chloroform             | 1.3                                       | 12                                            | SV-11           | 11.4                                |
| Naphthalene            | 1.0                                       | 8.0                                           | SV-2            | 180                                 |

| Contaminant of Concern | Resident VIS ( $\mu\text{g}/\text{m}^3$ ) | Non-Resident VIS ( $\mu\text{g}/\text{m}^3$ ) | Sample Location | Result ( $\mu\text{g}/\text{m}^3$ ) |
|------------------------|-------------------------------------------|-----------------------------------------------|-----------------|-------------------------------------|
| Tetrachloroethylene    | 21                                        | 170                                           | SV-1            | <b>280</b>                          |

Notes:  $\mu\text{g}/\text{m}^3$  – micrograms per cubic meter; **bold** indicates analyte was detected; shaded result indicates exceedance of resident Vapor Intrusion Standard (VIS); orange border indicates exceedance of non-resident VIS

**Table 7: Site Contaminants of Concern – Indoor Air**

| Contaminant of Concern    | Resident IAS ( $\mu\text{g}/\text{m}^3$ ) | Non-Resident IAS ( $\mu\text{g}/\text{m}^3$ ) | Sample Location | Result ( $\mu\text{g}/\text{m}^3$ ) |
|---------------------------|-------------------------------------------|-----------------------------------------------|-----------------|-------------------------------------|
| Benzene                   | 0.13                                      | 1.05                                          | IA-2            | <b>0.40</b>                         |
| Chloroform                | 0.04                                      | 0.36                                          | IA-1            | <b>0.25</b>                         |
| Naphthalene               | 0.262                                     | 0.262                                         | IA-1            | <b>0.52</b>                         |
| Tetrachloroethylene (PCE) | 0.63                                      | 5.11                                          | IA-1            | <b>14</b>                           |

Notes:  $\mu\text{g}/\text{m}^3$  – micrograms per cubic meter; **bold** indicates analyte was detected; shaded result indicates exceedance of resident Indoor Air Standard (IAS); orange border indicates exceedance of non-resident IAS

### 3.1.2. Soil Standards

The basis for soil cleanup at the Site is Vermont Soil Standards (VSS) for resident and non-resident properties, urban background values published in the IRule as Appendix A - § 35-APX-A1, and Soil Screening Levels for TPH (VT DEC, 2017). Soil contaminants of concern at the Site include PAHs, expressed as benzo(a)pyrene toxicity equivalence (B[a]P-TEQ), arsenic, lead, and TPH. These contaminants are generally limited to shallow soils (<1.5 feet bgs). Arsenic contaminated soils are limited to coal refuse adjacent the Site's rail spur west of the "L" building (SB-2; Figure 4). Lead is also present at this location and immediately north of the "L" building at concentrations exceeding the resident VSS, but below the non-resident VSS. Soil with concentrations of lead exceeding the resident VSS will be excavated for off-Site disposal. PAH concentrations generally exceed resident VSS, but are below urban background levels, in shallow soils throughout the Site. The only PAH exceedances of the non-resident VSS are associated with coal refuse west of the "L" building and stained surface soil associated with petroleum staining from a leaking 55-gallon drum (SB-3; Figure 4).

Soils within the gasoline UST source area (SB-16) are impacted by gasoline range organics (TPH-GRO). Minor surface staining associated with releases from one 55-gallon drum is impacted by diesel range organics (TPH-DRO).

### 3.1.3. Corrective Action Objectives

Based on redevelopment of the "L" building as an industrial hemp processing facility and restriction of future use of other Site buildings for commercial/industrial uses, corrective actions must achieve the following objectives:

1. Mitigate vapor intrusion of naphthalene vapors into the "L" building such that indoor air concentrations are less than non-resident IAS.
2. Management of PAH, lead, arsenic, and TPH contaminated soils for off-Site disposal.
3. Off-Site disposal of containers of petroleum and potentially hazardous materials and associated stained surface soil according to their waste characteristics.
4. Cleaning and closure of the "L" building floor drain system in accordance with Vermont UIC rules to prevent potential future discharges to the subsurface.

#### 3.1.4. Permitting

Building permits from the Town of St. Johnsbury will be required for the corrective action. Approved special waste profiles will be required for disposal facilities for excess soil that cannot be capped on-Site and disposal of containers, TPH-DRO contaminated soil, and sludge/liquids removed from the floor drain system. A traffic control plan should be prepared to manage the increased amount of truck traffic that will be entering and leaving the Site during Site redevelopment.

### 3.2. Redevelopment and Reuse Plan

The current redevelopment plan for the Site is provided as Figures 12, 13, and 14 and described in Section 1.3 of this CAP.

### 3.3. Basis of Design and Remedial Construction Plan

The basis of design for the SSD system is to ensure that indoor air concentrations of PCE and naphthalene inside the “L” building will not exceed the non-resident IAS. The SSD system will ventilate any accumulating vapors below the building slab. The SSD system to be constructed at the Site will consist of the materials listed in Table 8, below, or other equivalent materials as applicable.

*Table 8: Materials of Construction*

| Sub Slab Depressurization System                                                                                        |
|-------------------------------------------------------------------------------------------------------------------------|
| Four-inch diameter schedule 40 poly-vinyl chloride (PVC) pipe and fittings (sweep elbows, screens, caps, and couplings) |
| Washed 1-inch minus landscaping stone                                                                                   |
| PVC primer and cement                                                                                                   |
| 4-inch pipe mounting hardware                                                                                           |
| Elastomeric PVC flexible couplings                                                                                      |
| Magnehelic gauge and 1/4-inch diameter polyethylene tubing                                                              |
| Radon Fan – RadonAway GX4 or equivalent                                                                                 |
| Roof vent boot                                                                                                          |
| Audible/visual alarm – RadonAway RSA1 or equivalent                                                                     |
| Electrical wire and breaker switches                                                                                    |
| Flexible electrical conduit and mounting hardware                                                                       |

The basis of design to reduce the potential for direct contact with contaminated soils at the Site is excavation and off-Site disposal of soils containing contaminants at concentrations exceeding non-resident VSS or urban background levels.

### 3.4. Erosion Control Measures

Installation of silt fencing at the edge of the disturbed soil area will be required to prevent erosion and migration of sediment into the Passumpsic River, catch basins, and other sensitive areas.

Dust management activities will be performed by the Site contractor and will include wetting of surfaces with water during earthwork that disturbs contaminated soil. Calcium chloride may be added to assist in caking of soils and preventing the need for excessive watering.

### 3.5. SSD System

The objective of the SSD system is to mitigate vapor intrusion of PCE and naphthalene into the “L” building. To accomplish this, two SSD systems will establish a negative pressure of at least -0.008 “WC beneath the building slab. Proposed SSD system layout and details are presented on Figures 15 and 16, respectively, and described below.

---

SSD systems were designed in accordance with the American Society for Testing and Materials International (ASTM) Standard Practice E2121-13, Standard Practice for Installing Radon Mitigation Systems in Existing Low-Rise Residential Buildings, March 1, 2013.

Stone anticipates that four vapor extraction wells (EW-1 through EW-4; Figure 15) will be required to ensure the system provides adequate negative pressure between the sub-slab/foundation wall and indoor air environments. Extraction wells will be installed as follows:

1. Six-inch diameter cores will be removed from the slab and excavated approximately one foot below the base of the slab. Excavated soil will be managed in accordance with the Soil Management Plan (See Section 3.6).
2. Excavations will be backfilled with 1-inch diameter washed stone to the base of the slab elevation.
3. 4-inch diameter schedule 40 polyvinyl chloride (PVC) pipe be installed in each core hole and the annulus sealed with quick setting concrete
4. PVC expansion plugs will be installed to close SSD extraction wells and ventilation piping when the SSD system is not actively being constructed.
5. PVC expansion plugs will be installed to close the SSD extraction well when not in use.

Cox-Colvin Vapor Pins® will be installed at six locations (MP-1 through -6; Figure 15) as differential pressure monitoring points to enable measurement of differential pressures between the sub-slab and indoor air environments to confirm SSD system effectiveness. Vapor Pins® will be installed by advancing a 1.5-inch diameter hammer drill bit approximately 1.5-inches into the slab at each location, then advancing a 3/8-inch diameter drill bit through the slab in the center of each larger recess. After vacuuming debris from the resulting hole, a silicon sleeve will be placed around the base of the Vapor Pins®, which will be set in the foundation. Rubber caps will be placed over the open end of the Vapor Pins®, which will be secured with a stainless-steel flush mount cap when not in use.

Following extraction well and differential pressure monitoring point installation, the radius of influence will be determined at each extraction well by applying vacuum to the extraction wells and monitoring pressure differentials at monitoring points. Data generated during extraction well testing will be used to select the appropriate size fan and make other design alterations as appropriate. Alterations in design could include, but would not be limited to, changes in PVC pipe size, installation of additional extraction wells, or increase in fan size. Stone will document any design alterations, as necessary, in a letter to VT DEC for their approval prior to these changes being made. Based on pilot testing results, we do not expect design alterations will be required to achieve SSD corrective action objectives.

Four inch-diameter PVC pipe will be connected to each extraction well and plumbed together into two 4-inch diameter schedule 40 PVC pipes prior to exiting the building envelope. Gate valves will be installed between each extraction well and the manifold to allow flow adjustment during SSD system startup and subsequent monitoring. Exhaust vent piping will extend at least two feet above the building roofline and will be appropriately secured with brackets and flashed to prevent leaks around the building envelope penetration. A radon fan, with appropriate flow rate versus static pressure will be installed in-line with exhaust piping using elastomeric fittings on the building exterior. With this configuration, potential leaks from the fan and/or pressurized vent piping/fittings will be discharged to the building exterior. Monitoring ports will be installed in each extraction well pipe, prior to the manifold, to allow for air flow and vacuum measurements. Monitoring ports will consist of a 3/8-inch threaded hole in the PVC pipe plugged with a stainless-steel hex dive cap and O-ring when the system is in operation. One Magnehelic® pressure gauge will be installed in each SSD system to monitor the vacuum applied by the fan or blower. Radon fans or blowers will be wired in accordance with building codes by an electrical contractor.

Placards will be placed on the SSD systems that indicate an active remediation system is in operation and not to tamper. Placards will include Stone's contact information in the event the system is not operating properly. An audible/visual alarm (RadonAway RSA1 or equivalent) will monitor vacuum in each SSD system and will be triggered if applied vacuum drops below operating parameters, to be specified within the Operation and Maintenance Plan (OMP).

### 3.5.1. SSD System Startup

SSD system startup will occur upon installation of all components and include the following measurements:

1. Pressure differentials between each monitoring point and the building interior using a micro-manometer,
2. Applied vacuum at each extraction well using a manometer,
3. Air velocity utilizing a thermal anemometer, and
4. Relative levels of VOCs within SSD system effluent streams using a photoionization detector (PID).

One air sample will be collected from each SSD system influent stream using 6-liter Summa canisters equipped with a thirty-minute flow regulator to determine whether effluent requires treatment. Air emissions from SSD systems should be sampled at least three weeks following system startup to allow VOCs associated with PVC cement to off-gas. Effluent samples will be submitted to a NELAP accredited laboratory for analysis of VOCs by EPA Method TO-15. Results will be evaluated to determine if SSD system effluent treatment is required in accordance with Vermont Air Pollution Control Regulations. Based on concentrations of VOCs in sub-slab soil gas, Stone does not anticipate that treatment of SSD system effluent will be required. However, if treatment is required, design adjustments to the SSD systems will be provided as a CAP amendment.

## 3.6. Soil Management Plan

### 3.6.1. PAHs, Arsenic, and TPH-DRO

The extent of soils containing PAHs and arsenic at concentrations exceeding urban background and non-resident VSS and TPH-DRO exceeding non-resident soil screening values is shown on Figure 17. These include stained soils associated with an unsecure 55-gallon drum (SB-3), coal refuse located west of the "L" building (SB-2), and stained surface soil associated with a degraded 55-gallon drum (SL-2). These soils will be excavated for off-Site disposal at the Waste USA landfill in Coventry, Vermont, pending waste profile approval by Casella Waste. Waste characteristics samples will be required from SB-2/SB-3 and SL-2 to support waste profiling. Expected excavation dimensions and soil volume/weight is summarized in Table 9, below and are based on visual observations of soil staining and presence of coal refuse. Excavation dimensions may be expanded or contracted at the direction of a Qualified Environmental Professional based on visual, olfactory, or field screening (e.g. PID screening) evidence of contamination.

*Table 9: Excavation Summary*

| Investigation Location/Excavation Area | Excavation Area (Square Feet) | Depth (feet) | Soil Volume <sup>1</sup> (Cubic Yards) | Soil Weight <sup>2</sup> (tons) |
|----------------------------------------|-------------------------------|--------------|----------------------------------------|---------------------------------|
| SB-2                                   | 600                           | 6            | 160                                    | 240                             |
| SB-3                                   | 100                           | 2            | 9                                      | 14                              |
| SL-2                                   | 100                           | 2            | 9                                      | 14                              |
| <b>Total</b>                           |                               |              | <b>178</b>                             | <b>268</b>                      |

---

Notes: 1 – volume includes a 20% soil expansion factor and are rounded up to the closest whole number; 2 – assumes 1.5 tons/cubic yard of soil

Cleanup verification samples will be collected following exaction of the areas summarized in Table 9. Two soil samples will be collected from the bottom of excavation area SB-2 and one from the bottom of excavation area SB-3. These samples will be analyzed by a NELAP-accredited laboratory for PAHs by EPA Method 8270 with select ion monitoring (SIM) and RCRA 8 Metals by EPA Method 6020. One soil sample will be collected from the bottom of excavation areas SL-2 and will be analyzed by a NELAP-accredited laboratory for TPH-DRO by EPA Method 8015. One field duplicate will be collected for each analytical parameter.

If contaminants of concern are detected in cleanup verification samples at concentrations exceeding urban background (PAHs and arsenic) or non-resident soil screening levels (TPH-DRO), soil will be excavated in one-foot lifts and additional cleanup verification samples collected in the same manner as described above. This will be repeated until cleanup objectives are met.

### **3.6.2. Gasoline Impacted Soil**

Soils at the former gasoline UST location (SB/PZ-6) are contaminated by VOCs and TPH-GRO from depths ranging from approximately 3.5 and 17 feet below ground surface. Disturbance of these soils are not anticipated based on current redevelopment plans. Soil management would be required if future Site renovations require disturbance of these soils prior to UST soil and groundwater remediation, to be described in the full CAP. Pending disposal facility approval, excavated soil can either be disposed of at a Subtitle D landfill, such as the Waste USA landfill in Coventry, Vermont or treated at a thermal treatment facility, such as Clean Earth's facility in Loudon, New Hampshire. For disposal facility approval, Casella would require representative concentration results for every 500 tons of material (minimum) for Resource Conservation Recovery Act (RCRA) 8 Metals, VOCs, semi-volatile organic compounds (SVOCs), herbicides, and pesticides by toxicity characteristics leaching procedure (TCLP), reactivity cyanide and sulfide, corrosivity, and ignitability. Clean Earth, Inc. requires total analyses (non-TCLP) on soil for TPH, VOCs, SVOCs, PCBs, and RCRA 8 metals. If analytes exceed the RCRA 20-times rule, TCLP analyses would be required. Based on Site data, TCLP analysis would be required for TPH-GRO and VOCs. Clean Earth, Inc requires representative analyses for each 200 tons up to 2,000 tons, and every 500 tons thereafter.

### **3.6.3. Development Soils**

The balance of surface soil (0-1.5 feet bgs) not managed according to Section 3.6.1 of this CAP are development soils containing PAHs at concentrations above the resident VSS but below the Vermont urban background concentration. Development soils that remain on-Site do not require special management. Near-term redevelopment plans include the construction of a parking lot and sidewalks north and east of the "L" building that require removal of up to two feet of soil and subsequent installation of two feet of engineered fill and greenspaces that will require removal of six inches of development soils. This area is presented on Figure 17 as "Development Soil Area for Near-Term Redevelopment." Volume of estimated development soils that will be generated during near-term Site redevelopment is summarized in Table 10, below, assuming all development soils are disposed off-Site. Development soils will remain on-Site, to the extent practical. Development soils can be disposed off-Site as follows:

1. At a categorical solid waste facility permitted to receive development soils (none currently exist in Vermont).
2. Use as alternative daily cover at a solid waste disposal facility, such as the Waste USA landfill in Coventry, Vermont.

3. A receiving site within the St. Johnsbury urban soil background area, as delineated on the Vermont Agency of Natural Resources Natural Resources Atlas. At this time, there are no known receiving sites in St. Johnsbury.

**Table 10: Development Soil Summary – Near-Term Redevelopment**

| Redevelopment Feature | Excavation Area (Square Feet) | Depth (feet) | Soil Volume <sup>1</sup> (Cubic Yards) | Soil Weight <sup>2</sup> (tons) |
|-----------------------|-------------------------------|--------------|----------------------------------------|---------------------------------|
| Parking Lot           | 8,400                         | 1.5          | 560                                    | 840                             |
| Sidewalks             | 800                           | 1.5          | 55                                     | 82                              |
| Greenspace            | 3,800                         | 0.5          | 85                                     | 128                             |
| <b>Total</b>          |                               |              | <b>700</b>                             | <b>1,050</b>                    |

Notes: 1 – volume includes a 20% soil expansion factor and are rounded up to the closest whole number; 2 – assumes 1.5 tons/cubic yard of soil

Future Site renovations may generate additional excess development soils that will require management as described above.

### 3.7. Container Disposal

Containers of miscellaneous petroleum and potentially hazardous materials are stored throughout the Site. These articles will be inventoried, consolidated, packed in United States Department of Transportation (DOT) approved containers, and profiled for waste characteristics prior to off-Site disposal. Contractors performing this work shall have current hazardous waste operations and emergency response (HAZWOPER) training certification in compliance with the Occupational Safety and Health Administration (OSHA) standard 29 CFR Part 190.120.

### 3.8. Floor Drain Closure

The floor drain system shall be closed in accordance with Vermont's UIC regulations to prevent the system from serving as a contaminant migration pathway in the future. The wood coverings will be removed and discarded as demolition debris. The floor drain will be flushed, and liquids and sludge cleaned from the pit and contained in 55-gallon drums or other appropriate DOT approved containers for off-Site disposal according to their waste characteristics. The floor drain will be sealed with concrete. The pit associated with the floor drain system will be backfilled with material, to be determined by the Site civil engineer, suitable for structural and architectural plans for this area of the "L" building.

### 3.9. Quality Assurance Control Plan

Differential pressure, air flow, and PID measurements will be made, SSD exhaust air samples collected, and SSD performance testing conducted in accordance with the following Stone Standard Operating Procedures (SOPs), which are available upon request:

- Cox Colvin Vapor Pin® Installation: *SEI-5.51.2 Procedure for Collection of Soil Gas Samples for VOC Analysis*
- Discrete soil sampling for cleanup verification samples: *SEI-5.58.2 Collection, Handling, and Preservation of Discrete Soil Samples*
- Collection of SSD exhaust air samples: *SEI-5.62.0 Procedure for Collection of Indoor Air Samples for TO15 Analysis using Summa Canister*
- PID screening of SSD exhaust: *SEI-5.63.0 Use, Maintenance and Calibration of the Ion Science Tiger Photoionization Detector (PID)*
- SSD interim performance monitoring: *SEI-5.65.1: Sub-Slab Depressurization Pilot Testing Procedures*

- 
- Differential pressure measurements: *SEI-5.67.0 Use and Maintenance of the Omniguard™ 5 Manometer / Differential Pressure Recorder*
  - SSD exhaust airflow measurements: *SEI-5.68.0 Use and Maintenance of the TSI Velocicalc 9535 Anemometer*

### 3.10. Investigation Derived Waste Plan

Remediation wastes derived during the SSD system installation will be limited to construction debris, which will be disposed of as solid waste, and a small amount of excavated soil. Soil will be managed in accordance with Section 3.7 of this CAP. Stone does not anticipate that treatment of the SSD system exhaust will be required, however if treatment is necessary, remediation wastes will include liquids from a moisture knock-out drum and spent granular activated carbon (GAC). Liquid wastes will be disposed of as non-hazardous or hazardous waste according to its waste characteristics. GAC will either be disposed of according to its waste characteristics or regenerated at an appropriate thermal facility.

Remediation wastes derived from soil management, management of existing petroleum/potentially hazardous materials containers, and floor drain system closure will be limited to PPE and will be disposed of as solid waste.

### 3.11. Institutional Control Plan

As a BRELLA participant, Zion Growers will receive a Certificate of Completion (COC) upon completion of corrective actions described in this Partial CAP and those to be described in a full CAP that addresses contamination associated with releases from the former gasoline UST. The COC will serve as the institutional control and will be recorded in the Town of St. Johnsbury, Vermont Land Record for the 202 Bay Street property. Institutional control elements from this Partial CAP that will be included in the COC following completion of all Site remediation will, at a minimum, require that:

- The Site owner submit a certification to the VT DEC that the COC has been recorded on the Site Property deed,
- A brief description of the release of hazardous materials
- A brief description of the corrective actions that were implemented on the property,
- The location of contaminated soil vapor, soil, and groundwater that remains on-Site and a restriction that prevents the use of Site groundwater as a potable water source,
- The SSD system constructed in accordance with this CAP be routinely inspected for failure and maintained in perpetuity or until a VI pathway no longer exists,
- Maintenance of failed SSD system components be repaired promptly (within 30 days) under the supervision of personnel trained in accordance with the requirements of the OSHA HAZWOPER regulations (20 CFR 191.120),
- VT DEC be notified prior to any future Site renovations that could potentially affect the operation of the SSD system or create a potential VI pathway.
- Development soils generated during future Site work be managed in accordance with the Soil Management Plan included as Section 3.6 of the Partial CAP.

Additional institutional controls may be addressed in the full CAP should they be necessary for contamination associated with the former gasoline UST release.

### 3.12. Long-Term Monitoring and Operations and Maintenance

It is expected that the following O&M activities will be required quarterly for one year of SSD system operation to verify system effectiveness:

- 
1. Differential pressure measurements between indoor air and the ventilation layer to verify a negative pressure field in the ventilation layer relative to indoor air exists,
  2. Inspection of all mechanical elements and performance of any necessary maintenance,
  3. Collection of a sub-slab soil vapor sample from monitoring point MP-5 (Figure 15) to evaluate SSD system effectiveness of removing naphthalene from sub-slab soil vapor. Soil vapor samples should be collected in batch certified clean Summa canisters over a 30-minute period and analyzed for VOCs by EPA Method TO-15. One field duplicate will be collected during each monitoring event.

Once it is demonstrated that the SSD systems are effectively mitigating VI for a period of one year, the site owner will be responsible for periodically inspecting mechanical elements and performing any maintenance necessary. Soil vapor samples can be collected annually from MP-5, as described above. If VOCs are not detected in sub-slab soil vapor at concentrations exceeding resident VIS for sub-slab soil gas, the SSD system fan be turned off and the system operated passively and soil vapor samples collected annually from MW-5. If soil vapor VOC concentrations are below resident VIS for two consecutive years with the SSD system operating passively, continued operation of the SSD system can cease.

A licensed electrician will be contracted to perform any electrical repairs, such as the replacement of a fan requiring re-wiring. Any such work will be completed under the supervision of a QEP.

Following SSD system installation and startup, Stone will finalize the O&M plan that is attached in Appendix D as a sample O&M plan. The O&M plan outlines maintenance and monitoring requirements for the SSD system. The O&M plan includes the following key elements:

- An overview of the SSD system,
- Description of SSD system components,
- System operation requirements,
- Performance objectives,
- System troubleshooting guidance,
- Emergency contact information,
- Long-term system maintenance requirements, and
- Reporting requirements.

### 3.13. Health and Safety

Due to the presence of contaminated media at the Site, corrective actions should be performed using appropriate health and safety precautions. Construction and electrical contractors selected for engineered barrier construction, SSD system construction, container disposal, and floor drain system closure shall perform construction services under the auspices of their own site-specific health and safety plan, to be developed for the project. The contractors must make their own determinations as to the appropriate level of health and safety protection required for each of the construction activities described in this CAP.

### 3.14. Reporting

Following implementation of this CAP, a Corrective Action Construction Completion Report (CACCR) will be prepared in accordance with §35-608 of the IRule and submitted to the VT DEC, Sites Management Section. The CACCR will include a description of Site activities including dates of work and as-built construction diagrams.

The VT DEC shall be notified if the SSD systems have failed, or planned Site renovations or maintenance could potentially affect the effectiveness of these systems.

### 3.15. Schedule and Contracting

Upon approval of the CAP, the proposed schedule for completion of the corrective actions is provided in Table 11, below. Reporting will be completed within 30 days of completing Site activities. Quarterly SSD system monitoring will begin three months after SSD system startup. Proposed contractors are summarized in Table 12, below.

*Table 11: Proposed Schedule*

| Task                                                  | Responsible Party | Duration | Anticipated Start Date | Anticipated Completion Date |
|-------------------------------------------------------|-------------------|----------|------------------------|-----------------------------|
| Corrective Action Plan Regulatory Review and Approval | VTDEC             | 3 weeks  | April 20, 2022         | May 1, 2022                 |
| Corrective Action Plan Public Comment Period          | VTDEC/Stone       | 30 days  | May 1, 2022            | May 30, 2022                |
| SSD System Installation and Startup                   | Contractor/Stone  | 3 weeks  | June 13, 2022          | July 1, 2022                |
| Container Disposal                                    | Contractor/Stone  | 1 week   | June 13, 2022          | June 17, 2022               |
| Floor Drain Closure                                   | Contractor/Stone  | 1 day    | Week of June 13, 2022  |                             |
| Waste Characteristics and Soil Management             | Contractor/Stone  | 3 Weeks  | June 13, 2022          | July 1, 2022                |
| Corrective Action Construction Completion Report      | Stone             | 4 weeks  | July 1, 2022           | July 29, 2022               |

*Table 12: Proposed Contractors*

| Address                                                                                                          | Contact       | Title            | Phone         | Email                                                                                    |
|------------------------------------------------------------------------------------------------------------------|---------------|------------------|---------------|------------------------------------------------------------------------------------------|
| <b>Corrective Action Planning, Oversight, and Reporting: Stone Environmental, Inc.</b>                           |               |                  |               |                                                                                          |
| 535 Stone Cutters Way<br>Montpelier, VT 05602                                                                    | Lee Rosberg   | Senior Geologist | 802-229-5378  | <a href="mailto:lrosberg@stone-env.com">lrosberg@stone-env.com</a>                       |
| <b>SSD system, Soil Excavation and Engineered Barrier Construction: Neagley &amp; Chase Construction Company</b> |               |                  |               |                                                                                          |
| Meadowland Business Park<br>66 Bowdoin Street, Suite 100<br>South Burlington, Vermont 05403                      | Andrew Martin | CEO              | 802- 658-6320 | <a href="mailto:amartin@neagleychase.com">amartin@neagleychase.com</a>                   |
| <b>Container Disposal and Floor Drain Closure: Absolute Spill Response, LLC</b>                                  |               |                  |               |                                                                                          |
| 21 Metro Way<br>Unit 7<br>PO Box 309<br>Barre, VT 05641                                                          | Steve Singer  | Branch Manager   | 802-552-4200  | <a href="mailto:ssinger@absolutespillresponse.com">ssinger@absolutespillresponse.com</a> |

### 3.16. Cost

Stone has prepared a cost estimate for the corrective actions specified herein, including soil management, design, installation, startup, and quarterly monitoring of the SSD system, container disposal, floor drain closure, and subsequent corrective action completion report. The costs presented below are representative of the remedial system design elements, as described within this CAP, which are necessary to mitigate exposure to Site contaminants. The costs include one year of quarterly SSD system O&M performed by a QEP. Additional O&M costs following the first year of system operation are not included in the detailed costs.

Stone utilized past project experience to estimate the cost of the proposed remedies. The estimated cost to implement the corrective actions as described within this CAP is approximately \$247,500 as summarized in Table 13. A detailed cost estimate is provided as Appendix C. A 20% contingency has been included to account for variations in contractor bids, and unforeseen circumstances.

*Table 13: 202 Bay Street CAP Cost Summary*

| Task                                                      | Professional Services | Consultant       | Expenses        | Cost             |
|-----------------------------------------------------------|-----------------------|------------------|-----------------|------------------|
| Task 1 - Project Management                               | \$8,460               | \$0              | \$187           | \$8,647          |
| Task 2 - SSD System Installation & Startup                | \$4,368               | \$10,197         | \$4,685         | \$19,250         |
| Task 3 - SSD System Quarterly Monitoring - 1 Year         | \$5,274               | \$2,640          | \$2,148         | \$10,062         |
| Task 4 - Soil Management                                  | \$10,012              | \$121,002        | \$1,665         | \$132,679        |
| Task 5 - Container Disposal                               | \$1,664               | \$22,000         | \$289           | \$23,953         |
| Task 6 - Floor Drain Closure                              | \$832                 | \$5,500          | \$145           | \$6,477          |
| Task 7 - Corrective Action Construction Completion Report | \$5,000               | \$0              | \$160           | \$5,160          |
| <b>TOTAL</b>                                              | <b>\$35,610</b>       | <b>\$161,339</b> | <b>\$9,278</b>  | <b>\$206,227</b> |
| <b>TOTAL (20% Contingency)</b>                            | <b>\$42,732</b>       | <b>\$193,607</b> | <b>\$11,134</b> | <b>\$247,473</b> |

---

## 4. References

---

Ratcliffe, N.M., Stanley, R.S., Gale, M.H., Thompson, P.J., and Walsh, G.J., 2011, *Bedrock Geologic Map of Vermont*, U.S. Geological Survey Scientific Investigations Map 3184, 3 sheets, scale 1:100,000.

Stone Environmental, Inc., 2021a. *Phase I Environmental Site Assessment: 202 Bay Street, St. Johnsbury, Vermont, Revision 1*. January 26.

Stone Environmental, Inc., 2021b. *Phase II Environmental Site Assessment Report: 202 Bay Street, St. Johnsbury, Vermont, Revision 2*. August 9

Stone Environmental, Inc., 2022. *Supplemental Site Investigation Report and Evaluation of Corrective Action Alternatives: 202 Bay Street, St. Johnsbury, Vermont, SMS #20204966*. March 21

Surficial Geologic Map of Vermont, 1970, Stewart and MacClintock, Doll, ed. Digital Data (VT Open Geodata Portal).

Vermont Department of Environmental Conservation, 2017, *Soil Screening Levels for Total Petroleum Hydrocarbons*, May 31.

Vermont Department of Environmental Conservation, 2019, *Investigation and Remediation of Contaminated Properties Rule*, July 6.

---

# Appendix A: Figures

---

*Figure 1: Location Map*

*Figure 2: Vicinity Map*

*Figure 3: Site Map*

*Figure 4: VOC and SVOC Concentrations in Soil*

*Figure 5: Metals Concentrations in Soil*

*Figure 6: VOC and SVOC Concentrations in Groundwater – Phase II ESA*

*Figure 7: VOCs in Groundwater – SSI*

*Figure 8: Naphthalene and PCE Concentrations in Soil Gas*

*Figure 9: SSD Pilot Test Results*

*Figure 10: A-A' cross section*

*Figure 11: B-B' cross section*

*Figure 12: Redevelopment Plan*

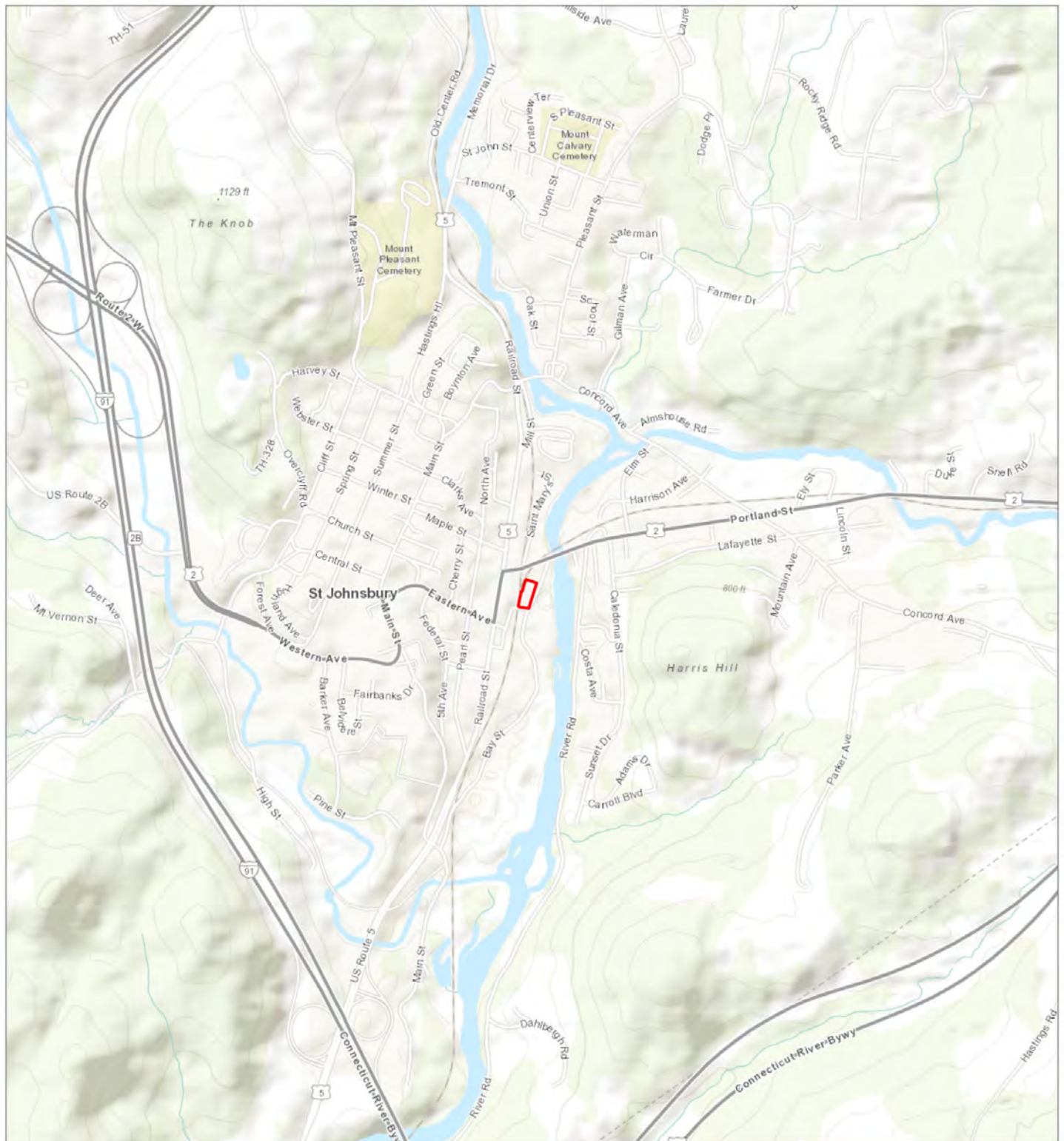
*Figure 13: L Building Floor Plan – First Floor*

*Figure 14: L Building Floor Plan – Second Floor*

*Figure 15: SSD System Layout*

*Figure 16: SSD System Details*

*Figure 17: Soil Management Plan*



# LEGEND

Site Boundary

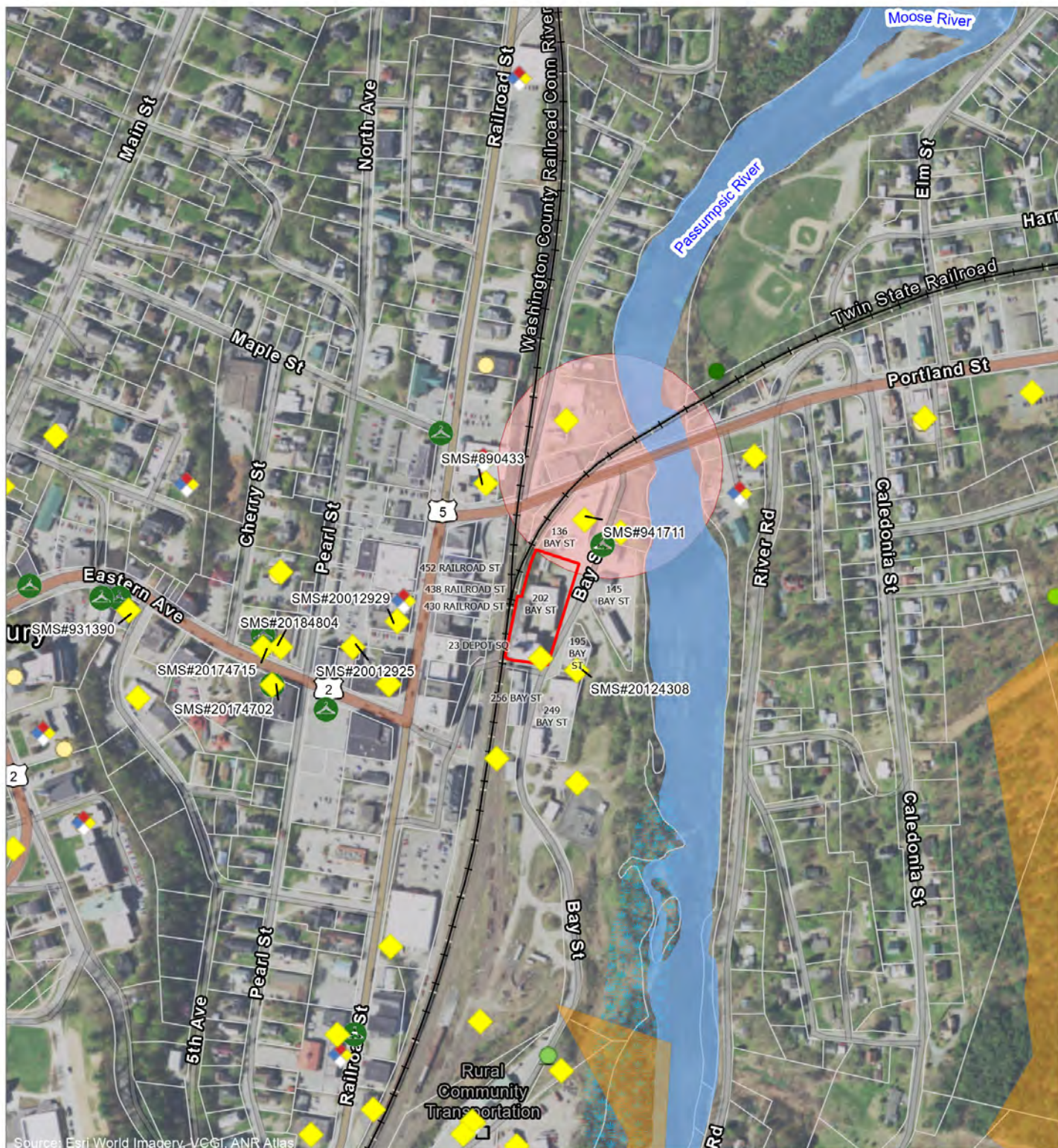


## Figure 1: Location Map

202 Bay Street  
St. Johnsbury, Vermont

Prepared for VT DEC

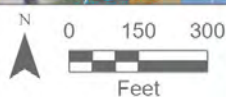
**STONE ENVIRONMENTAL**



Source: Esri World Imagery, VCGI, ANR Atlas

## LEGEND

- |                                                                                                                                                                 |                                                                          |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------|
| <span style="border: 2px solid red; display: inline-block; width: 15px; height: 10px;"></span> Site Boundary                                                    | <span style="color: blue;">◆</span> Hazardous Waste Generators           |
| <span style="border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Parcel Boundary                                                | <span style="color: green;">●</span> Aboveground Storage Tank            |
| <span style="background-color: lightblue; display: inline-block; width: 15px; height: 10px;"></span> River                                                      | <span style="color: green;">●</span> Dry Cleaner                         |
| <span style="background-color: lightblue; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> VT Significant Wetlands Inventory | <span style="color: yellow;">●</span> Underground Storage Tank (working) |
| <span style="background-color: orange; display: inline-block; width: 15px; height: 10px;"></span> Habitat Blocks and Wildlife Corridors                         | <span style="color: green;">●</span> Private Wells                       |
| <span style="background-color: orange; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> 3                                    | <span style="color: green;">●</span> GPS Location                        |
| <span style="background-color: pink; display: inline-block; width: 15px; height: 10px;"></span> Uncommon Species and Other Features                             | <span style="color: green;">●</span> screen digitized                    |
| <span style="background-color: pink; border: 1px solid black; display: inline-block; width: 15px; height: 10px;"></span> Animal                                 | <span style="color: grey;">●</span> E911 Address                         |
| <span style="color: black;">—+—</span> Rail Lines                                                                                                               |                                                                          |
| <span style="color: yellow;">◆</span> Hazardous Waste Sites                                                                                                     |                                                                          |



## Figure 2: Vicinity Map

202 Bay Street  
St. Johnsbury, Vermont

Prepared for VT DEC

**STONE ENVIRONMENTAL**



## LEGEND

- |                                                                                                                                                               |                                                                                                                                                               |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <span style="border: 2px solid red; padding: 2px;"> </span> Site Boundary                                                                                     | <span style="display: inline-block; width: 10px; height: 10px; background-color: black; border-radius: 50%;"></span> Soil Boring                              |
| <span style="display: inline-block; width: 20px; height: 10px; background-color: lightblue; border: 1px solid black;"></span> Building of Interest            | <span style="display: inline-block; width: 10px; height: 10px; background-color: lightgreen; border: 1px solid black;"></span> Soil Gas                       |
| <span style="display: inline-block; width: 20px; height: 10px; background-color: lightblue; border: 1px solid black;"></span> Former Machine Shop             | <span style="display: inline-block; width: 10px; height: 10px; background-color: white; border: 1px solid black;"></span> Wipe Sample                         |
| <span style="display: inline-block; width: 20px; height: 10px; background-color: white; border: 1px solid black;"></span> Parcel Boundary                     | <span style="display: inline-block; width: 10px; height: 10px; background-color: white; border: 1px solid black;"></span> Wood                                |
| <span style="display: inline-block; width: 10px; height: 10px; background-color: yellow; border-radius: 50%;"></span> Hazardous Waste Sites                   | <b>2022 Sample Locations</b>                                                                                                                                  |
| <span style="display: inline-block; width: 10px; height: 10px; background-color: red; border-radius: 50%;"></span> Point of Interest                          | <span style="display: inline-block; width: 10px; height: 10px; background-color: black; border-radius: 50%;"></span> Indoor Air                               |
| <b>2021 Sample Locations</b>                                                                                                                                  | <span style="display: inline-block; width: 10px; height: 10px; background-color: red; border: 1px solid black; border-radius: 50%;"></span> Extraction Well   |
| <span style="display: inline-block; width: 10px; height: 10px; background-color: black; border-radius: 50%;"></span> Bulk Oil                                 | <span style="display: inline-block; width: 10px; height: 10px; background-color: orange; border-radius: 50%;"></span> Soil Boring                             |
| <span style="display: inline-block; width: 10px; height: 10px; background-color: black; border-radius: 50%;"></span> Indoor Air                               | <span style="display: inline-block; width: 10px; height: 10px; background-color: lightgreen; border-radius: 50%;"></span> Soil Gas                            |
| <span style="display: inline-block; width: 10px; height: 10px; background-color: black; border: 1px solid black; border-radius: 50%;"></span> Monitoring Well | <span style="display: inline-block; width: 10px; height: 10px; background-color: black; border: 1px solid black; border-radius: 50%;"></span> Monitoring Well |

**Site Building Key:**  
 1) Former office building  
 2) Carriage sheds  
 3) Former retail and storage building  
 4) Former ginst mill building  
 5) Former grain elevator and storage building  
 6) Coal hoppers shed

**Site Point of Interest Key:**  
 A) 55-gallon drum of motor oil, gasoline canister, 5-gallon bucket of gear oil  
 B) Degraded drum pile along railroad embankment  
 C) Approximately 15-gallon metal drum  
 D) Spilled 5-gallon buckets of motor oil, unlabeled containers, empty drums  
 E) Scale Canopy  
 F) Approximate Location of Former 500-gallon gasoline UST  
 G) Floor Pit  
 H) Floor Drain

Path: O:\PROJ-20\EAR\20-117 202 Bay Street\GIS\20-117 202 Bay Street\20-117 202 Bay Street\_R01.aprx Saved:



## Figure 3: Site Map

202 Bay Street  
 St. Johnsbury, Vermont

Prepared for VT DEC

**STONE ENVIRONMENTAL**

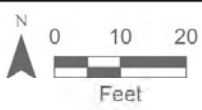
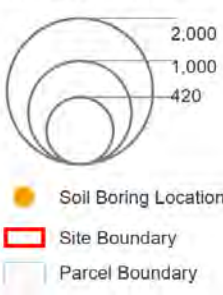


LEGEND

Select VOC Results



Sum of selected Fields



Vermont Soil Standards (mg/Kg) - Resident / Non-Resident

1,2,4-Trimethylbenzene - 144 / 177

1,3,5-Trimethylbenzene - 144 / 177

Ethylbenzene - 3.7 / 22

Naphthalene - 2.7 / 16

Total Xylene - 252 / 257

B(a)P-TEQ - 0.07 / 1.54 / 0.58 (Urban Background)

Notes:

Size of pie chart is proportional to the sum of detections of analytes listed.

Bold results indicate an exceedance of the residential enforcement standard

Red results indicate an exceedance of the non-residential enforcement standard

Italicized results indicate an exceedance of urban background

U - Analyte not detected; limit of quantitation listed

Figure 4 - VOC and SVOC Concentrations in Soil

202 Bay Street  
St Johnsbury VT

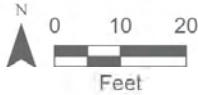
Prepared for VT DEC





LEGEND

- Site Boundary
- Parcel Boundary
- Soil Sample Location



Vermont Soil Standards - Resident / Non-Resident (mg/Kg)  
Arsenic - 16 / 16  
Lead - 400 / 800

Notes:  
Bold results indicate detections of the analyte  
Red results indicate an exceedance of the residential enforcement standard  
Italicized results indicate an exceedance of the non-residential enforcement standard  
U - Analyte not detected; limit of quantitation listed

Figure 5 - Metals Concentrations in Soil

202 Bay Street  
St Johnsbury VT

Prepared for VT DEC





Source: Esri World Imagery, VCGI

LEGEND

Site Boundary

Parcel Boundary

VOC & SVOC Results

Non-Detect

Detection

Select VOC Concentrations



1,2,4-Trimethylbenzene

1,3,5-Trimethylbenzene

Ethylbenzene

Naphthalene

Toluene

Total Xylene

Vermont Groundwater Enforcement Standards (VGES) (µg/L):

1,2,4-Trimethylbenzene - 23

1,3,5-Trimethylbenzene - 23

Ethylbenzene - 700

Naphthalene - 0.5

Toluene - 1000

Total Xylene - 10000

Benzo(a)pyrene - 0.2

Notes:

Red results indicate an exceedance of the VGES

U - Analyte not detected; limit of quantitation listed

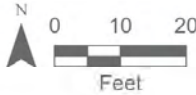


Figure 6 - VOC and SVOC Concentrations in Groundwater - Phase II ESA

202 Bay Street  
St Johnsbury VT

Prepared for VT DEC

STONE ENVIRONMENTAL



LEGEND

- Site Boundary
- Parcel Boundary
- Monitoring Well Location with Groundwater Elevation (ft)
- 0.1' Groundwater Contours
- VOC & SVOC Results
- Non-Detect
- Detection
- Select VOC Concentrations
- 1,2,4-Trimethylbenzene
- 1,3,5-Trimethylbenzene
- Benzene
- Naphthalene

Notes:  
Monitoring wells gauged by Stone 2/23/2022  
and surveyed 2/16/2022, relative to local site datum.  
Red results indicate an exceedance of the VGES

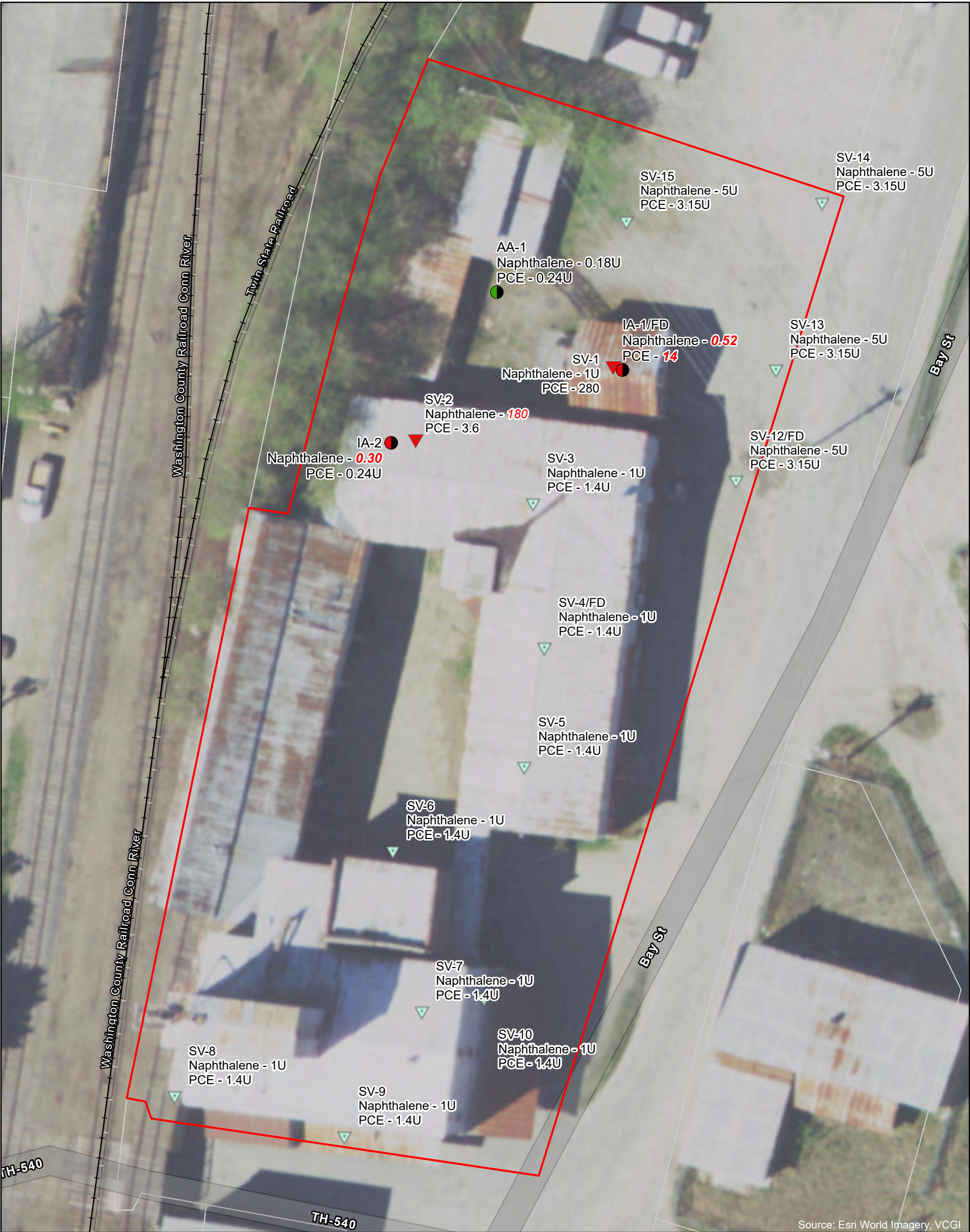


Vermont Groundwater Enforcement Standards (VGES) (µg/L):  
1,2,4-Trimethylbenzene - 23  
1,3,5-Trimethylbenzene - 23  
Benzene - 5  
Naphthalene - 0.5

Figure 7 - VOCs in Groundwater - SSI

202 Bay Street  
St Johnsbury VT

Prepared for VT DEC



LEGEND

Site Boundary

Rail Lines

Parcel Boundary

Soil Gas Sample Location

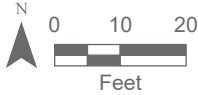
Detection

Non-Detect

Indoor Air Sample Location

Detection

Non-Detect



Vapor Intrusion Standards Resident / Non-Resident ( $\mu\text{g}/\text{m}^3$ ):  
Naphthalene - 1 / 8  
Tetrachloroethylene (PCE) - 21 / 170

Indoor Air Standards Resident / Non-Resident ( $\mu\text{g}/\text{m}^3$ ):  
Naphthalene - 0.262 / 0.262  
Tetrachloroethylene (PCE) - 0.63 / 5.11

Notes:  
Red results indicate an exceedance of the resident standard  
Italicized results indicate an exceedance of the non-resident standard  
U - Analyte not detected; limit of quantitation listed

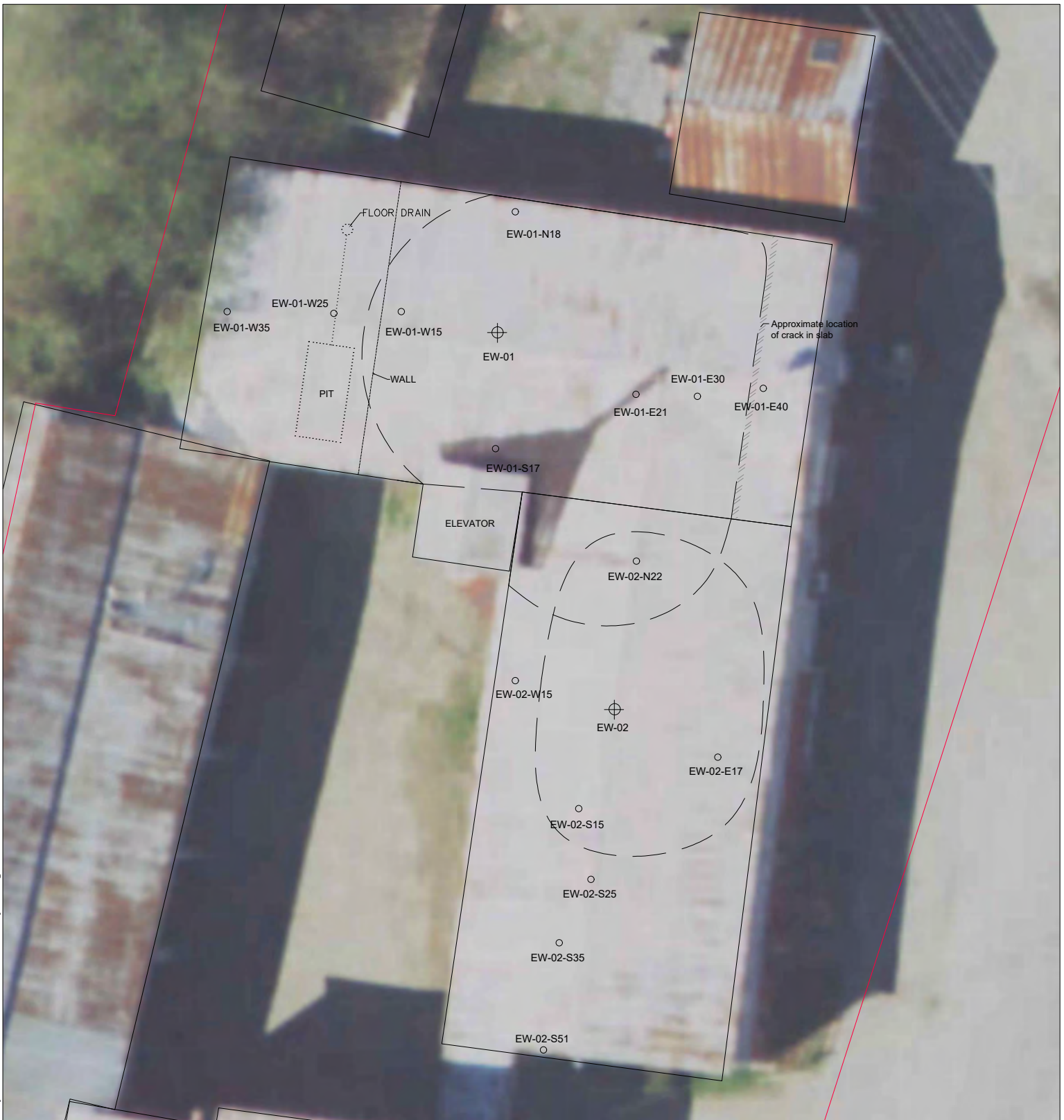
Figure 8 - Naphthalene & Tetrachloroethylene Concentrations in Soil Gas & Indoor Air

202 Bay Street  
St Johnsbury VT

Prepared for VT DEC

STONE ENVIRONMENTAL

File: O:\PROJ-20\EAR\20-117 202 Bay Street\Drawings\AutoCAD\20-117 202 Bay St.dwg



### Legend



EXTRACTION WELL



MONITORING POINT



BUILDING OUTLINE (APPROXIMATE)



SITE BOUNDARY



ZONE OF INFLUENCE

#### APPLIED VACUUM

EW-01: 3.2 inches of water column

EW-02: 2.6 inches of water column

Drawn On: 3/16/2022  
Drawn By: SLW  
Checked On: 3/18/22  
Checked By: KJM  
Project No.: 20-117

DRAWING SCALE

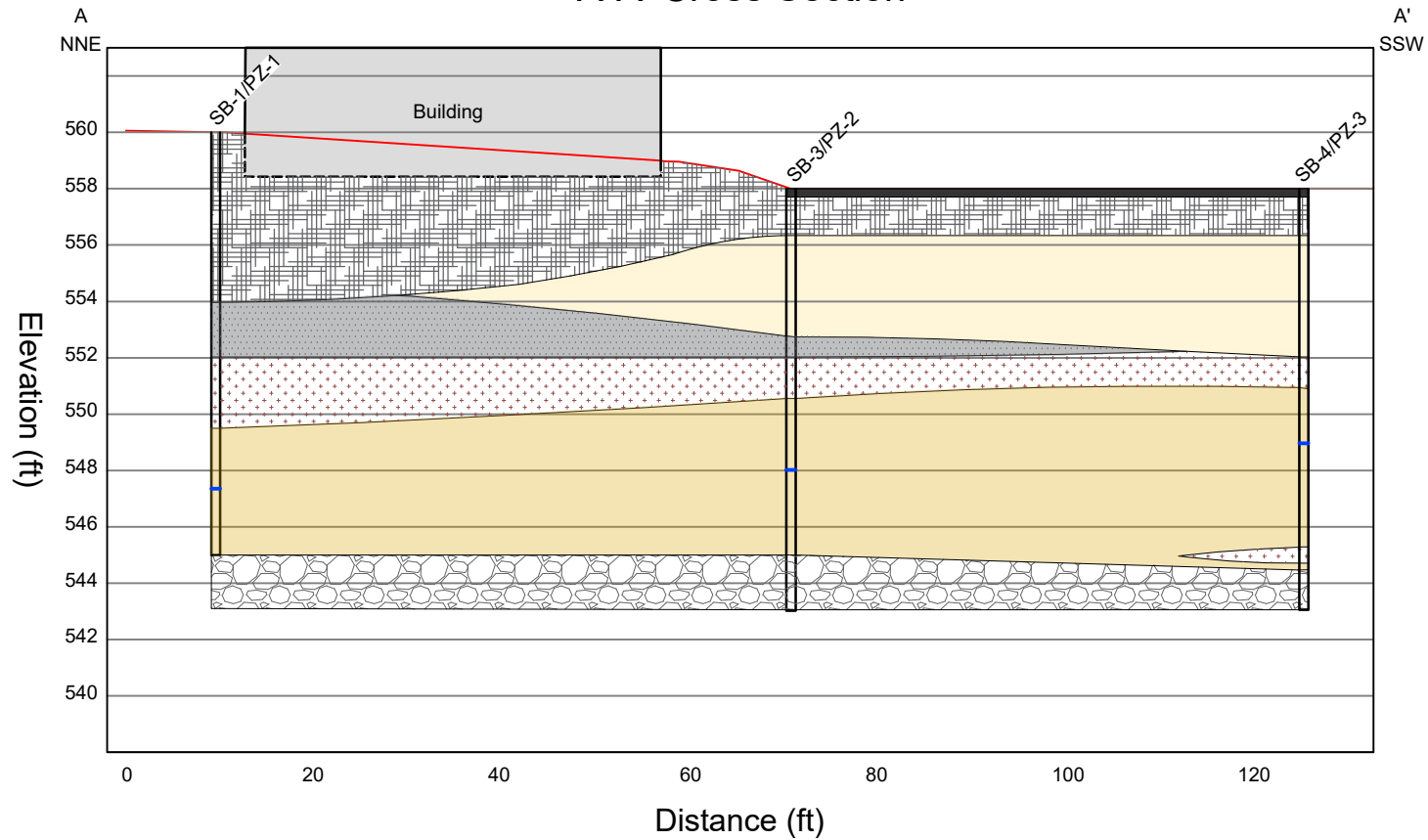


File:



SSD Pilot Test Results  
202 Bay Street  
St. Johnsbury Vermont

# A-A' Cross Section



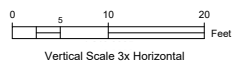
## LEGEND



Sources:  
Ground surface from VCGI 1' Lidar Elevation\_CN1T2016\_N5383E135  
Groundwater elevations from Stone Environmental 7/6/2021 & 7/7/2021

Drawn On: 8/4/2021  
Drawn By: LBR  
Checked On: 8/4/2021  
Checked By: LJR  
Project No.: 20-117

DRAWING SCALE



**STONE ENVIRONMENTAL**

535 Stone Cutters Way / Montpelier / VT / 05602 / USA  
802.229.4541 / info@stone-env.com / www.stone-env.com

A-A' CROSS SECTION  
CORRECTIV ACTION PLAN  
202 BAY STREET

ST JOHNSBURY

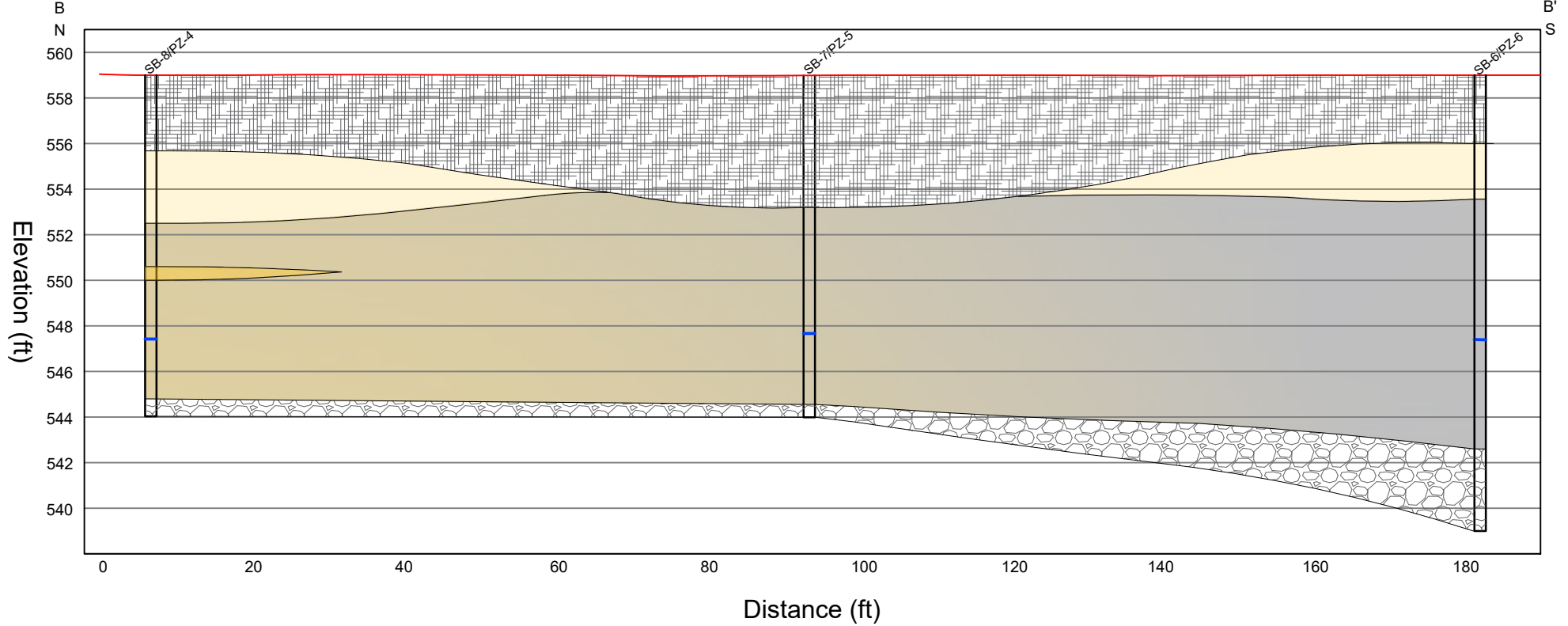
VERMONT

44

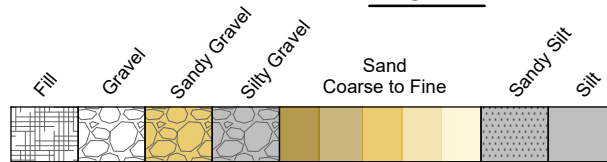
FIGURE NO.

10

# B-B' Cross Section



## LEGEND

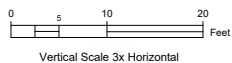


- Soil Boring
- Groundwater
- Ground Surface

Sources:  
Ground surface from VCGI 1' Lidar Elevation\_CN1T2016\_N5383E135  
Groundwater elevations from Stone Environmental 7/6/2021 & 7/7/2021

Drawn On: 8/4/2021  
Drawn By: LBR  
Checked On: 8/4/2021  
Checked By: LJR  
Project No.: 20-117

DRAWING SCALE



**STONE ENVIRONMENTAL**

535 Stone Cutters Way / Montpelier / VT / 05602 / USA  
802.229.4541 / info@stone-env.com / www.stone-env.com

B-B' CROSS SECTION  
CORRECTIVE ACTION PLAN  
202 BAY STREET

ST JOHNSBURY

VERMONT

45

FIGURE NO.

11



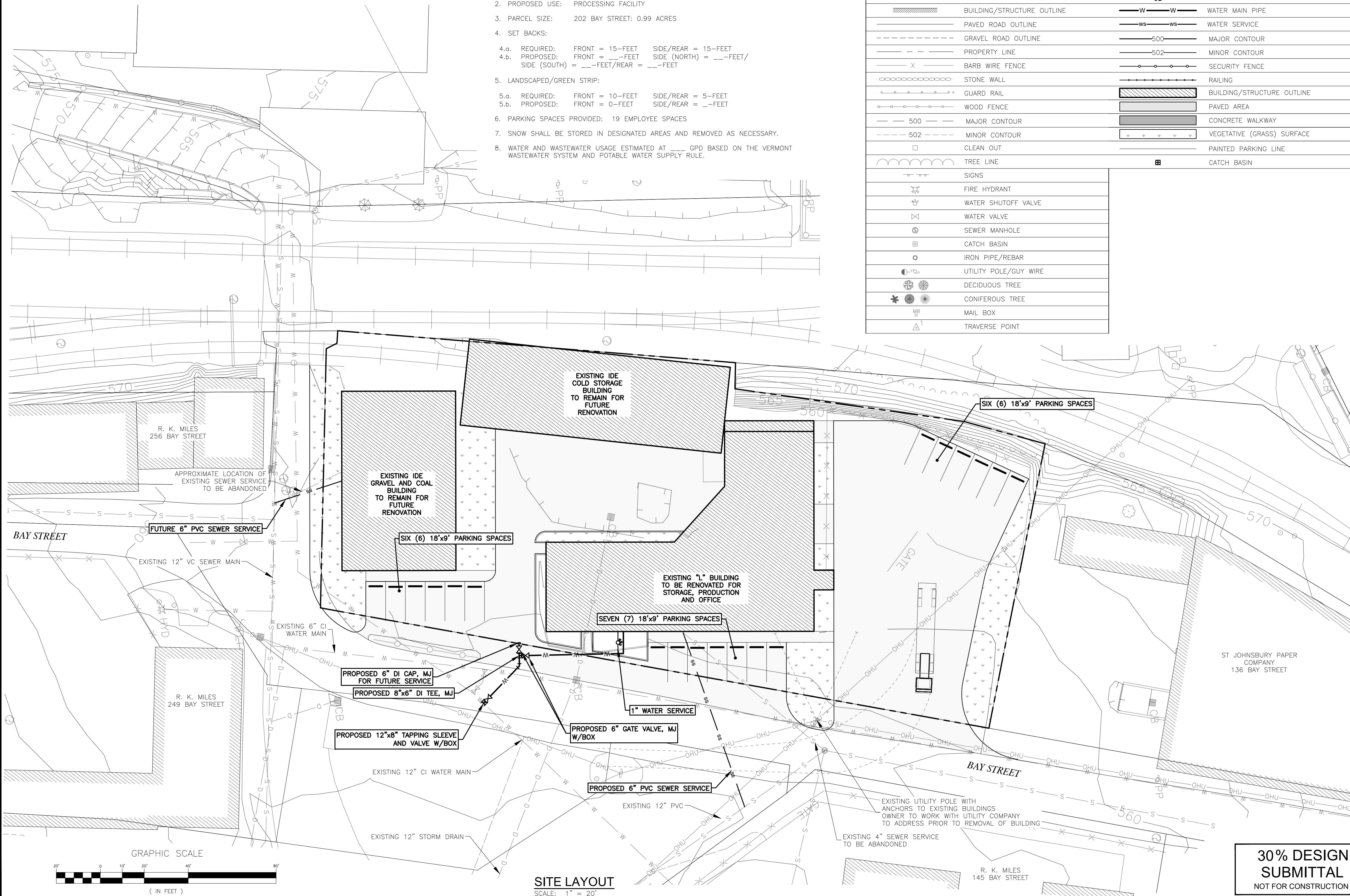
GENERAL NOTES:

1. TOPOGRAPHIC SURVEY IS BASED ON AERIAL SURVEY AND BOUNDARY LINES BASED ON TAX MAP INFORMATION, THIS IS NOT A BOUNDARY SURVEY.
2. THERE ARE BURIED UTILITIES ON THIS SITE. THE LOCATION OF BURIED UTILITIES ARE NOT WARRANTED TO BE EXACT.
3. REFER TO SHEET C2 FOR GENERAL DETAILS.

**ZONING NOTES:**

1. ZONING DISTRICT: MIXED USE
2. PROPOSED USE: PROCESSING FACILITY
3. PARCEL SIZE: 202 BAY STREET: 0.99 ACRES
4. SET BACKS:
  - 4.a. REQUIRED: FRONT = 15- FEET SIDE/REAR = 15- FEET
  - 4.b. PROPOSED: FRONT = \_\_\_- FEET SIDE (NORTH) = \_\_\_- FEET/  
SIDE (SOUTH) = \_\_\_- FEET/REAR = \_\_\_- FEET
5. LANDSCAPED/GREEN STRIP:
  - 5.a. REQUIRED: FRONT = 10- FEET SIDE/REAR = 5- FEET
  - 5.b. PROPOSED: FRONT = 0- FEET SIDE/REAR = \_\_\_- FEET
6. PARKING SPACES PROVIDED: 19 EMPLOYEE SPACES
7. SNOW SHALL BE STORED IN DESIGNATED AREAS AND REMOVED AS NECESSARY.
8. WATER AND WASTEWATER USAGE ESTIMATED AT \_\_\_ GPD BASED ON THE VERMONT WASTEWATER SYSTEM AND POTABLE WATER SUPPLY RULE.

| LEGEND                     |                            |
|----------------------------|----------------------------|
| EXISTING:                  | PROPOSED:                  |
| W                          | S                          |
| S                          | ss                         |
| D                          | D                          |
| OHU                        | UD                         |
| BUILDING/STRUCTURE OUTLINE | W                          |
| PAVED ROAD OUTLINE         | ws                         |
| GRAVEL ROAD OUTLINE        | 500                        |
| PROPERTY LINE              | 502                        |
| BARB WIRE FENCE            | SECURITY FENCE             |
| STONE WALL                 | RAILING                    |
| GUARD RAIL                 | BUILDING/STRUCTURE OUTLINE |
| WOOD FENCE                 | PAVED AREA                 |
| MAJOR CONTOUR              | CONCRETE WALKWAY           |
| MINOR CONTOUR              | VEGETATIVE (GRASS) SURFACE |
| CLEAN OUT                  | PAINTED PARKING LINE       |
| TREE LINE                  | CATCH BASIN                |
| SIGNS                      |                            |
| FIRE HYDRANT               |                            |
| WATER SHUTOFF VALVE        |                            |
| WATER VALVE                |                            |
| SEWER MANHOLE              |                            |
| CATCH BASIN                |                            |
| IRON PIPE/REBAR            |                            |
| UTILITY POLE/GUY WIRE      |                            |
| DECIDUOUS TREE             |                            |
| CONIFEROUS TREE            |                            |
| MAIL BOX                   |                            |
| TRAVERSE POINT             |                            |



Springfield, VT • Tel: (802) 674-2904 Fax: (802) 674-2913  
Barre, VT • Tel: (802) 479-3698  
St. Johnsbury, VT • Tel: (802) 748-8605  
Manchester, VT • Tel: (802) 768-8291

Dufresne Group is owned by Dufresne & Associates, PC

Dufresne Group is owned by Dufresne & Associates, PC

[illegible]

ZION GROWERS  
202 BAY STREET FACILITY

## SITE LAYOUT

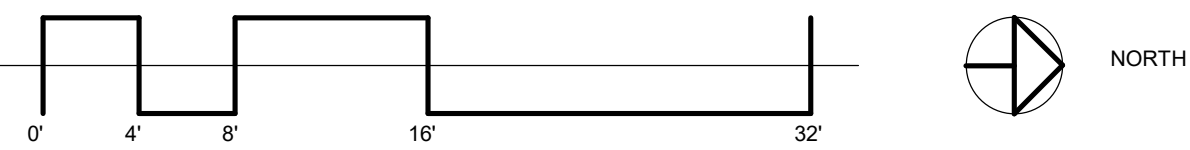
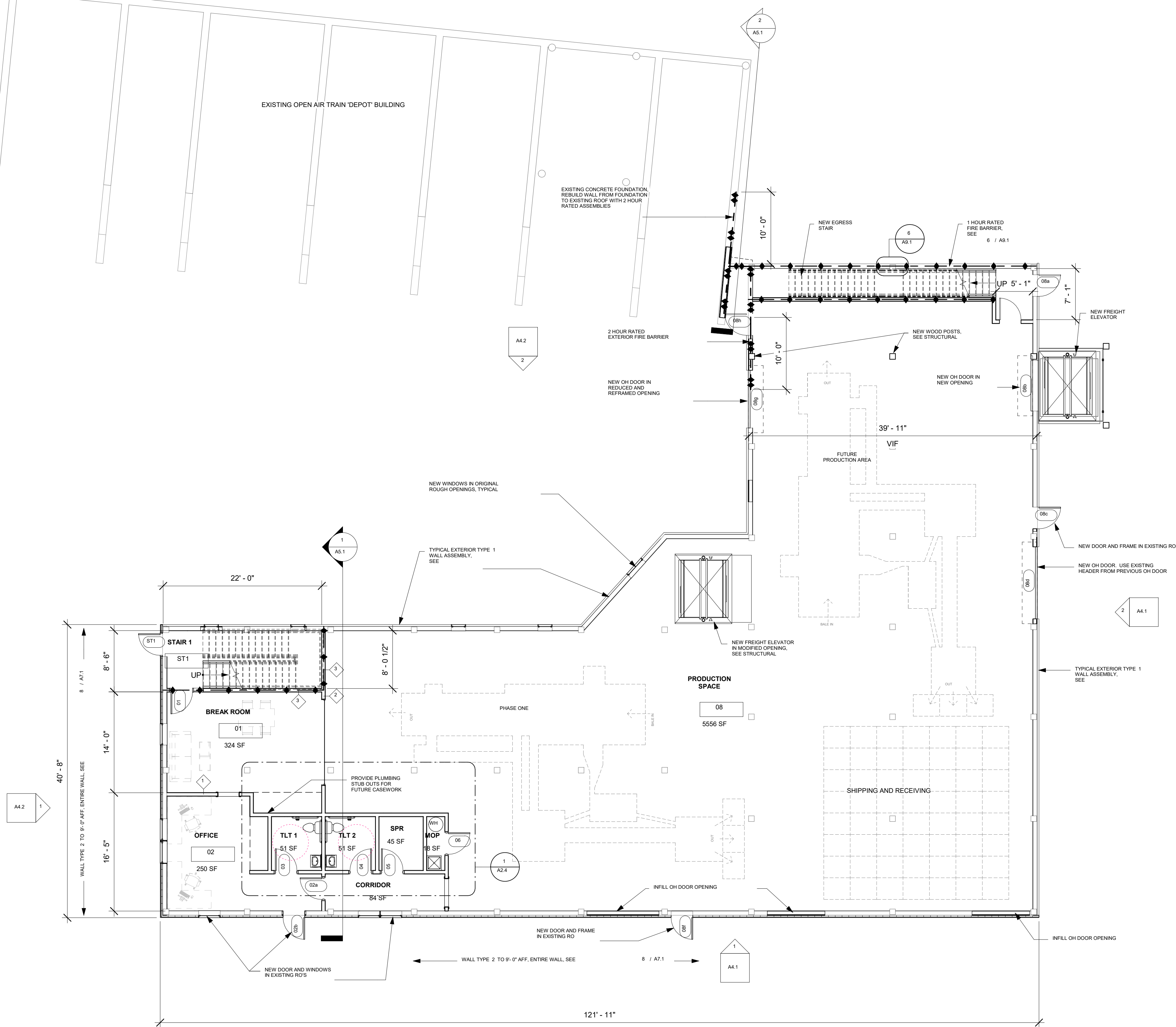
ST JOHNSBURY, VERMONT

|              |               |
|--------------|---------------|
| Project #    | 7121022       |
| Project Mgr. | SMW           |
| Design by    | EAE           |
| Drawn by     | EAE           |
| Reviewed by  | SMW           |
| Approved by  | SMW           |
| Date         | DEC. 30, 2021 |
| Scale        | AS SHOWN      |

30% DESIGN  
SUBMITTAL  
NOT FOR CONSTRUCTION

C1

Figure 13: L Building Floor Plan - First Floor



- FIRST FLOOR GENERAL NOTES:**
1. ADD METAL STRAPPING TO THE EXTERIOR SHEATHING BEFORE INSTALLING NEW SIDING.
  2. REPLACE ALL OH AND MAN DOORS WITH NEW, R-10 MIN FOR OH DOORS, R-2.7 MIN FOR MAN DOORS.
  3. ADD NEW CBES COMPLIANT WINDOWS.
  4. AT EXISTING SLAB, REPAIR AS NECESSARY. SEAL FOR DUST. FINISHES: TILE CARPET AT OFFICE AND MEETING ROOM.
  5. ADD COLUMNS BACK IN AT OVERSIZED OH DOOR, REWORK FRAMING TO RESTORE STRUCTURAL CONNECTIONS.
  6. AT BATHROOMS, BOTH ACCESSIBLE. 5/8\"/>

1 FIRST FLOOR PROPOSED PLAN  
1/8" = 1'-0"

**SCOTT + PARTNERS**  
ARCHITECTURE

7 CANNIBAL ST. ESSEX JUNCTION, VT 05452  
P. 802.872.2294 F. 802.872.2294  
SCOTTPARTNERS.COM

Project Name:  
**ZION GROWERS**

Project Address:  
202 BAY STREET, ST. JOHNSBURY, VERMONT, 05819

|             |              |
|-------------|--------------|
| scale:      | 1/8" = 1'-0" |
| project no. | 21-1454      |
| checked by: | JA           |
| drawn by:   | EK/ CD       |
| proj. date: |              |
| sheet date: | 12/20/21     |

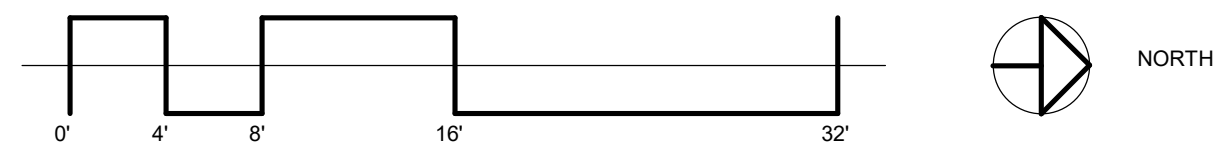
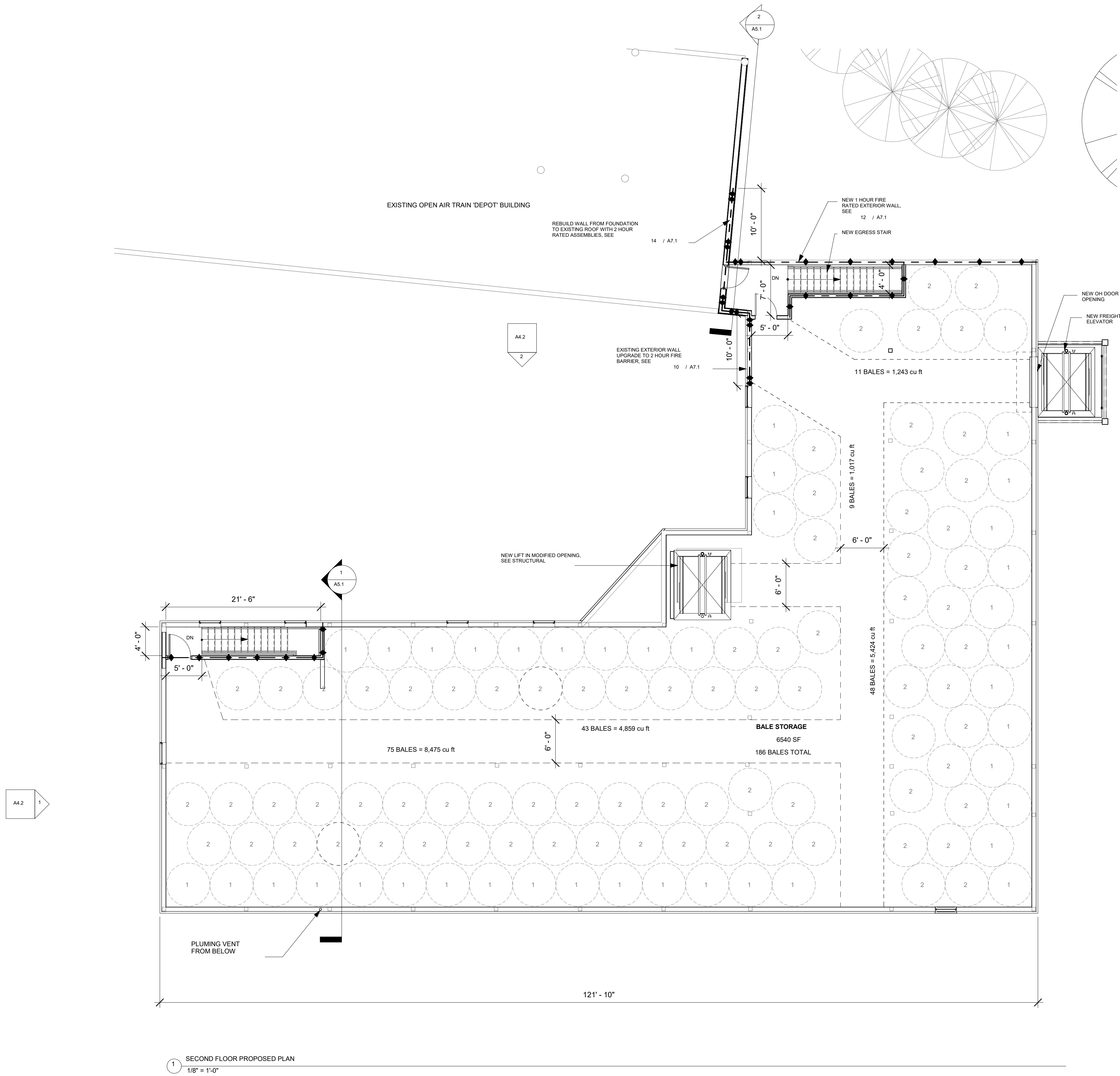
| No | Date | Revisions |
|----|------|-----------|
|----|------|-----------|

sheet title:  
**PROPOSED FIRST FLOOR PLAN**

sheet no.  
**A2.1**

PHASE 1 PRICING SET - 1/7/2021  
NOT FOR CONSTRUCTION

Figure 14: L Building Floor Plan - Second Floor



- SECOND FLOOR GENERAL NOTES:**
1. BALES STORED IN LARGE "PILES" PER NFPA 45 (25,000 CF MAX) PER PILE. PILES SEPARATED BY 5' - 0" MIN WIDE AISLES, NON-COMBUSTIBLE SEPARATION BETWEEN PILES.
  2. TO EXISTING PLANK FLOORING: ADD SHEET AIR BARRIER TO PREVENT DUST/ SMOKE FROM FILTERING DOWN TO FIRST FLOOR LEVEL. ADD 5/8" PLYWOOD ON ENTIRE FLOOR FOR STRUCTURAL DIAPHRAGM AND FORKLIFT TRAFFIC SURFACE.
  3. ADD FIRE-BLOCKING AT FLOOR TO WALL JOINT AND TIE NEW FLOOR TO WALLS.

**SCOTT + PARTNERS**  
ARCHITECTURE

7 CANNONBALL ST. ESSEX JUNCTION, VT 05452  
P. 802.872.2794 F. 802.872.2794  
SCOTTPARTNERS.COM

project name:  
**ZION GROWERS**

project address:  
202 BAY STREET, ST. JOHNSBURY, VERMONT, 05819

|             |              |
|-------------|--------------|
| scale:      | 1/8" = 1'-0" |
| project no. | 21-1454      |
| checked by: | JA           |
| drawn by:   | EK/ CD       |
| proj. date: |              |
| sheet date: | 12/20/21     |

| No | Date | Revisions |
|----|------|-----------|
|----|------|-----------|

sheet title:  
**PROPOSED  
SECOND FLOOR  
PLAN**

sheet no.  
**A2.2**

PHASE 1 PRICING SET - 1/7/2021  
NOT FOR CONSTRUCTION

File: O:\PROJ-20\YEAR\20-117 202 Bay Street\Drawings\AutoCAD\20-117 202 Bay St.dwg

DRAWING CREDITS

Drawn On: 04/05/2022  
Drawn By: LBR  
Checked On: 04/07/2022  
Checked By: LJR  
Project No.: 20-117

| REVISIONS | # | Date | Drwn | Chk'd | App'd | Description |
|-----------|---|------|------|-------|-------|-------------|
|           |   |      |      |       |       |             |
|           |   |      |      |       |       |             |
|           |   |      |      |       |       |             |
|           |   |      |      |       |       |             |

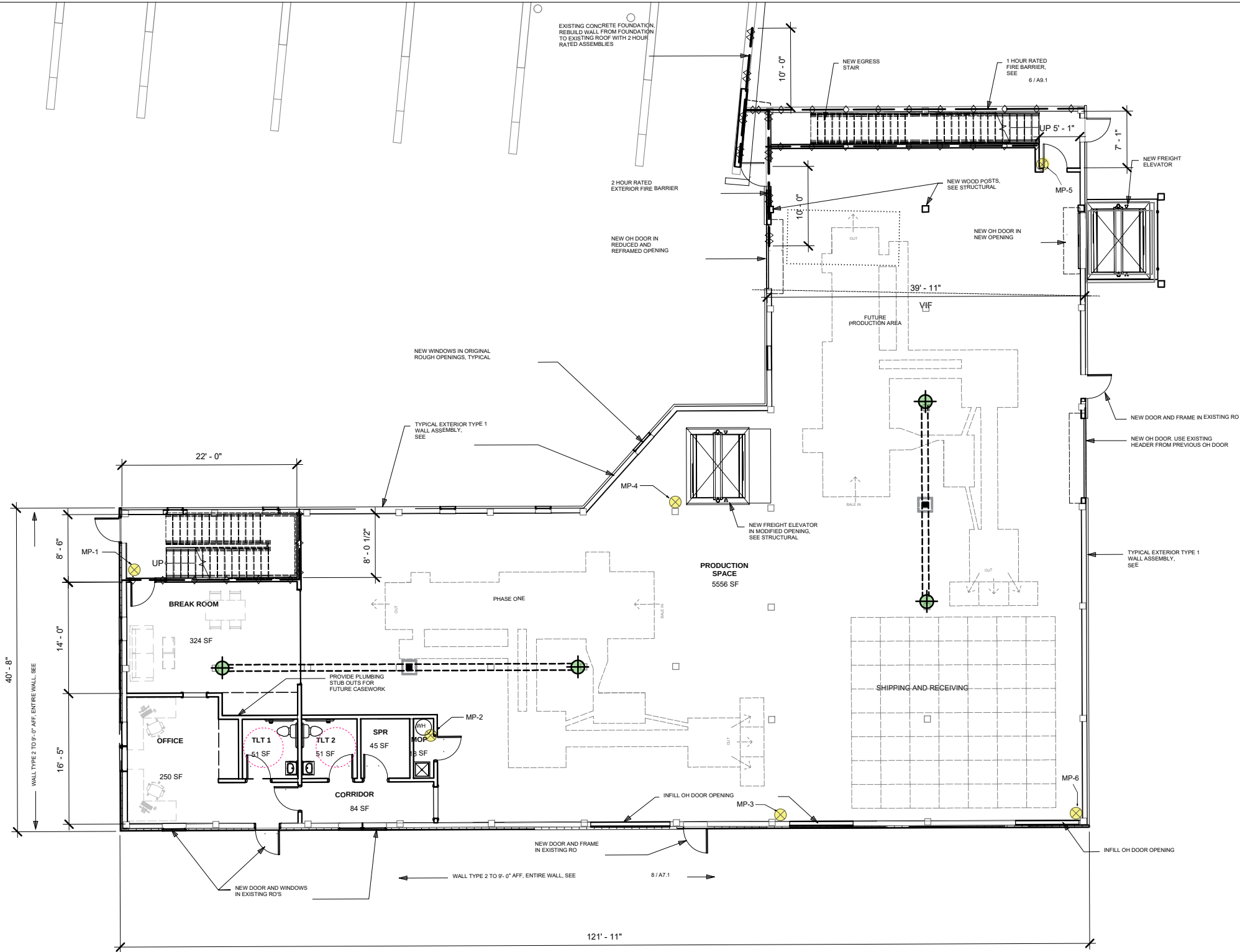
DRAWING SCALE



STONE ENVIRONMENTAL

535 Stone Cutters Way / Montpelier / VT / 05602 / USA  
802.229.4541 / info@stone-env.com / www.stone-env.com

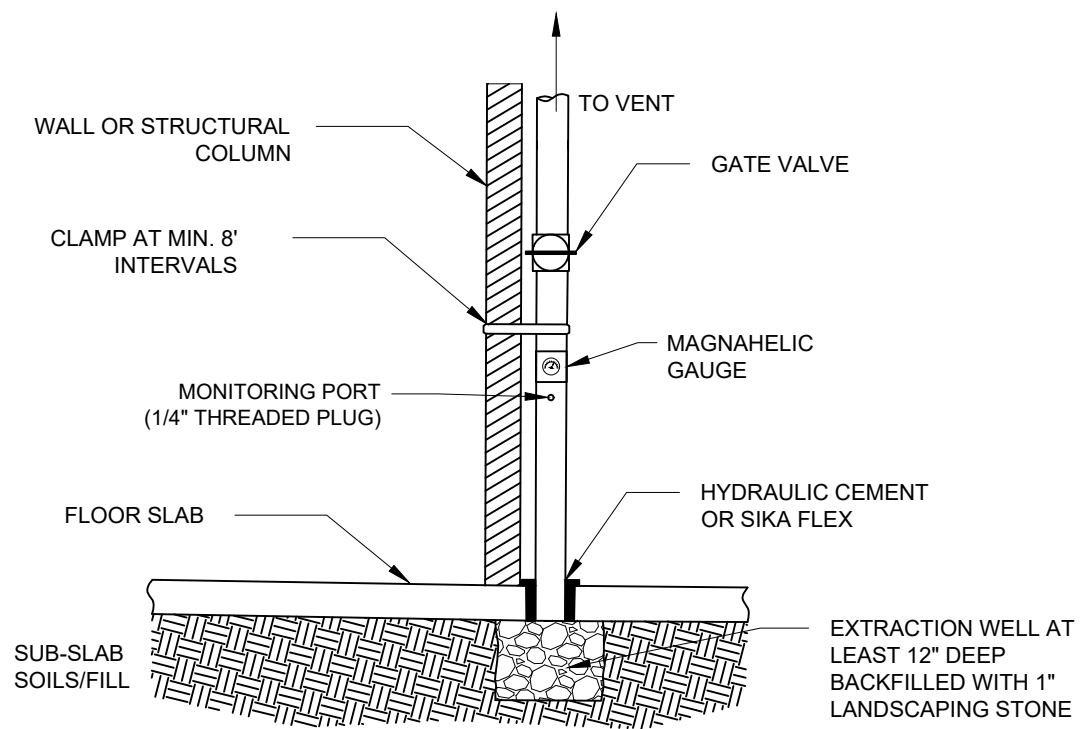
SSD SYSTEM LAYOUT  
CORRECTIVE ACTION PLAN  
202 BAY STREET  
ST JOHNSBURY VERMONT



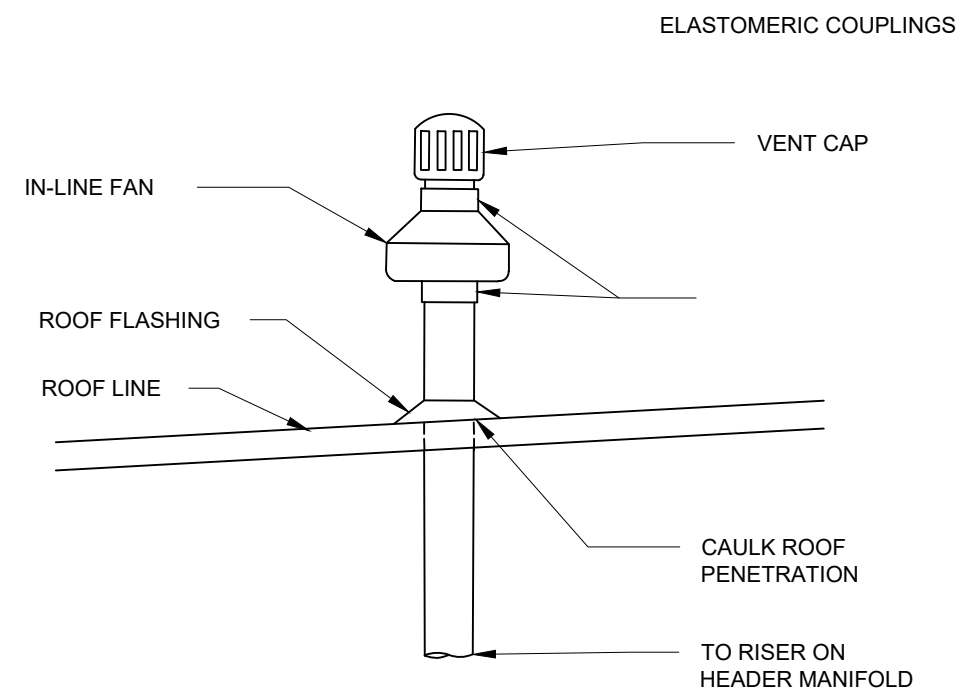
LEGEND

- SSD MONITORING POINT
- SSD EXTRACTION WELL
- SSD EXHAUST ROOF PERFORATION/FAN LOCATION
- SSD EFFLUENT PIPE

Notes:  
Building layout derived from Scott + Partners  
Architecture, Zion Growers, 12/20/21.



**A** EXTRACTION WELL AND COLLECTOR PIPE DETAIL  
NOT TO SCALE



**B** ROOF PENETRATION AND VENT DETAIL  
NOT TO SCALE

File: O:\PROJ-20\YEAR\20-117 202 Bay Street\DrawData\AutoCAD\20-117 202 Bay St.dwg

| DRAWING CREDITS | REVISIONS |            |      |       |       |              |
|-----------------|-----------|------------|------|-------|-------|--------------|
|                 | #         | Date       | Drwn | Chk'd | App'd | Description  |
|                 | 1         | 04/05/2022 | LBR  |       |       | Drawn On:    |
|                 | 2         | 04/07/2022 | LJR  |       |       | Checked On:  |
|                 | 3         |            |      |       |       | Checked By:  |
|                 | 4         |            |      |       |       | Project No.: |

DRAWING SCALE

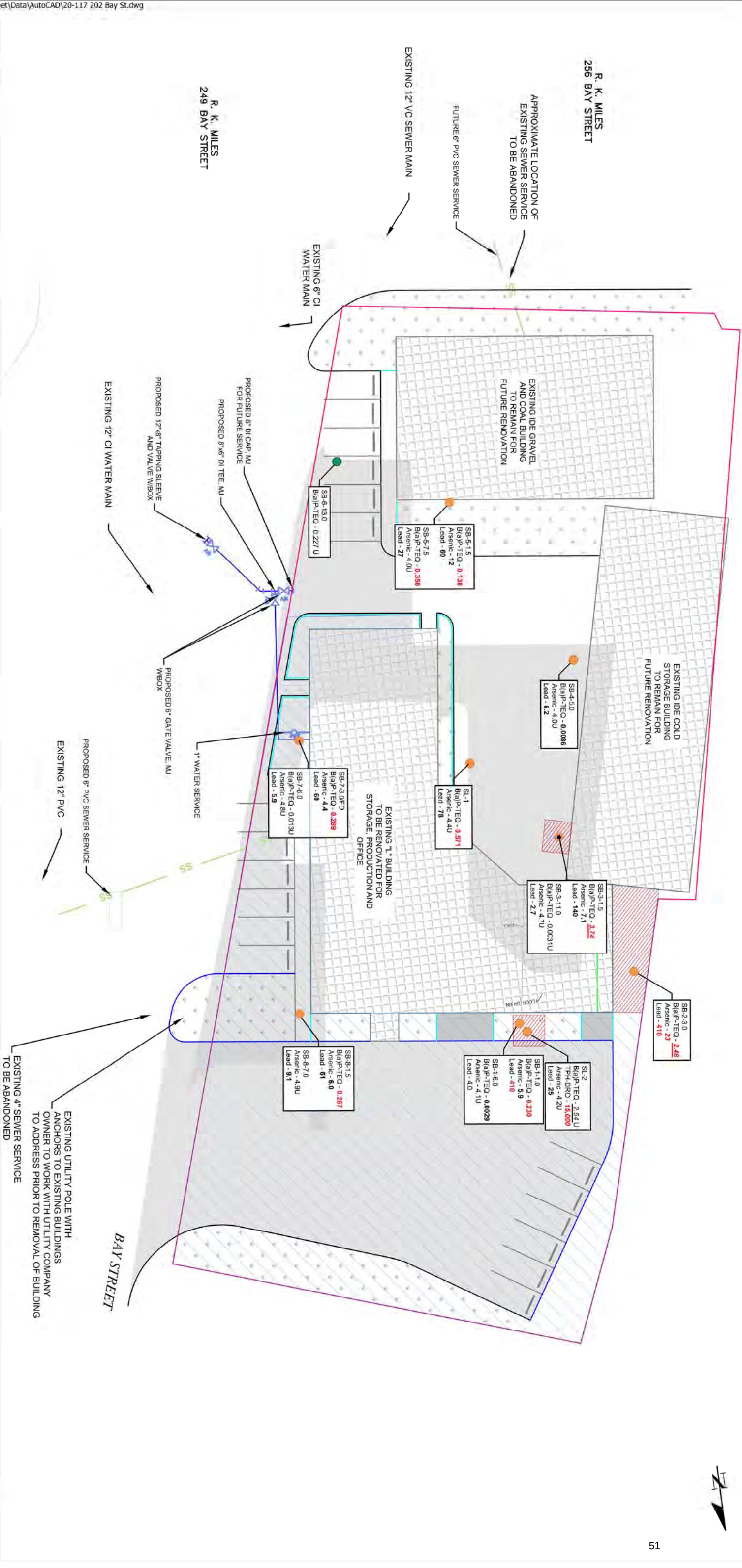


**STONE ENVIRONMENTAL**

535 Stone Cutters Way / Montpelier / VT / 05602 / USA  
802.229.4541 / info@stone-env.com / www.stone-env.com

SSD SYSTEM DETAILS  
CORRECTIVE ACTION PLAN  
202 BAY STREET

ST JOHNSBURY VERMONT



**LEGEND**

**Bi(a)P-TEQ Concentrations:**

- Soil Boring - Non-Detect
- Soil Boring - Detection
- Soils above Urban Background or Non-Resident Screening Values, Requires Off-Site Disposal

**Development Soil Area for near-term development**

**LEGEND**

- Paved Area
- Building/Structure Outline
- Vegetative (Grass) Surface

**NOTES:**

Bi(a)P-TEQ - Benzo(a)pyrene Toxic Equivalency Quotient

TPH-DRO - Total Petroleum Hydrocarbon - Diesel Range Organics

U - Analyte not detected; limit of quantitation listed

**Bold** results indicate an exceedance of the residential enforcement standard

**Underlined** results indicate an exceedance of the non-residential enforcement standard

**Italicized** results indicate an exceedance of the non-residential enforcement standard

**Sources:**

Building layout derived from Scott + Partners Architecture, Zion Growers, 12/20/21.

**Vermont Soil Standards - Bi(a)P-TEQ (mg/kg)**

Resident - 0.07

Urban Background - 0.58

Non-Resident - 1.54

**VT Soil Screening Values - TPH-DRO (mg/kg)**

Resident - 95

Non-Resident - 440

**VT Soil Screening Values - Aroclor (mg/kg)**

Resident - 16

Non-Resident - 16

**DRAWING CREDITS**

| # | Date       | Drawn | Checked | App'd | Description            |
|---|------------|-------|---------|-------|------------------------|
| 1 | 04/05/2022 | LBR   |         |       | Drawn On: 04/05/2022   |
| 2 | 04/07/2022 | LBR   |         |       | Drawn By: LBR          |
| 3 | 04/07/2022 | LBR   |         |       | Checked On: 04/07/2022 |
| 4 | 04/07/2022 | LBR   |         |       | Checked By: LBR        |
| 5 | 04/07/2022 | LBR   |         |       | Project No.: 20-117    |

**DRAWING SCALE**

0 20 40

**STONE ENVIRONMENTAL**

535 Stone Cutters Way / Montpelier / VT / 05602 / USA

802.229.4541 / info@stone-env.com / www.stone-env.com

**SOIL MANAGEMENT PLAN**

**CORRECTIVE ACTION PLAN**

**202 BAY STREET**

**ST JOHNSBURY**

**VERMONT**

**FIGURE NO.**

**17**

---

## Appendix B: Tables

---

Table B-2  
Semi-Volatile Organic Compound Analytical Results - Soil Samples

| Sample ID                        |                | VSS - Resident Soil | VSS - Non-Resident Soil | EPA Residential RSL | EPA Industrial RSL | SB-1-1.0 |   | SB-1-6.0 |   | SB-2-3.0 |   | SB-3-1.5 |   | SB-3-11.0 |   | SB-4-5.0 |   |
|----------------------------------|----------------|---------------------|-------------------------|---------------------|--------------------|----------|---|----------|---|----------|---|----------|---|-----------|---|----------|---|
| Sample Date                      | CAS#           | (mg/Kg)             | (mg/Kg)                 | (mg/Kg)             | (mg/Kg)            | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021  | Q | 7/6/2021 | Q |
| 1,2,4,5-Tetrachlorobenzene       | 95-94-3        | NE                  | NE                      | 23                  | 350                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 1,2,4-Trichlorobenzene           | 120-82-1       | NE                  | NE                      | 24                  | 110                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 1,2-Dichlorobenzene              | 95-50-1        | NE                  | NE                      | 1800                | 9300               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 1,2-Diphenylhydrazine/Azobenzene | 122-66-7       | NE                  | NE                      | 0.68                | 2.9                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 1,3-Dichlorobenzene              | 541-73-1       | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 1,4-Dichlorobenzene              | 106-46-7       | NE                  | NE                      | 2.6                 | 11                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 1-Methylnaphthalene              | 90-12-0        | NE                  | NE                      | 18                  | 73                 | NA       |   | NA       |   | 0.82 U   |   | NA       |   | NA        |   | NA       |   |
| 2,4,5-Trichlorophenol            | 95-95-4        | NE                  | NE                      | 6300                | 82000              | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2,4,6-Trichlorophenol            | 88-06-2        | NE                  | NE                      | 49                  | 210                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2,4-Dichlorophenol               | 120-83-2       | NE                  | NE                      | 190                 | 2500               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2,4-Dimethylphenol               | 105-67-9       | NE                  | NE                      | 1300                | 16000              | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2,4-Dinitrophenol                | 51-28-5        | NE                  | NE                      | 130                 | 1600               | NA       |   | NA       |   | 3.2 U    |   | NA       |   | NA        |   | NA       |   |
| 2,4-Dinitrotoluene               | 121-14-2       | NE                  | NE                      | 1.7                 | 7.4                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2,6-Dinitrotoluene               | 606-20-2       | NE                  | NE                      | 0.36                | 1.5                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2-Chloronaphthalene              | 91-58-7        | NE                  | NE                      | 4800                | 60000              | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2-Chlorophenol                   | 95-57-8        | NE                  | NE                      | 390                 | 5800               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2-Methylnaphthalene              | 91-57-6        | NE                  | NE                      | 240                 | 3000               | 0.25     |   | 0.042 U  |   | 0.82 U   |   | 0.16 U   |   | 0.046 U   |   | 0.040 U  |   |
| 2-Methylphenol                   | 95-48-7        | NE                  | NE                      | 3200                | 41000              | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2-Nitroaniline                   | 88-74-4        | NE                  | NE                      | 630                 | 8000               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 2-Nitrophenol                    | 88-75-5        | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 3,3-Dichlorobenzidine            | 91-94-1        | NE                  | NE                      | 1.2                 | 5.1                | NA       |   | NA       |   | 0.82 U   |   | NA       |   | NA        |   | NA       |   |
| 3/4-Methylphenol                 | 108-39-4/106-4 | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 3-Nitroaniline                   | 99-09-2        | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 4,6-Dinitro-2-methylphenol       | 534-52-1       | NE                  | NE                      | 5.1                 | 66                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 4-Bromophenylphenylether         | 101-55-3       | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 4-Chloro-3-methylphenol          | 59-50-7        | NE                  | NE                      | 6300                | 82000              | NA       |   | NA       |   | 3.2 U    |   | NA       |   | NA        |   | NA       |   |
| 4-Chloroaniline                  | 106-47-8       | NE                  | NE                      | 2.7                 | 11                 | NA       |   | NA       |   | 3.2 U    |   | NA       |   | NA        |   | NA       |   |
| 4-Chlorophenylphenylether        | 7005-72-3      | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 4-Nitroaniline                   | 100-01-6       | NE                  | NE                      | 27                  | 110                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| 4-Nitrophenol                    | 100-02-7       | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 3.2 U    |   | NA       |   | NA        |   | NA       |   |
| Acenaphthene                     | 83-32-9        | NE                  | NE                      | 3600                | 45000              | 0.038 U  |   | 0.010 U  |   | 0.82 U   |   | 0.040 U  |   | 0.012 U   |   | 0.010 U  |   |
| Acenaphthylene (SIM)             | 208-96-8       | NE                  | NE                      | NE                  | NE                 | 0.038 U  |   | 0.010 U  |   | 0.82 U   |   | 0.26     |   | 0.012 U   |   | 0.010 U  |   |
| Acetophenone                     | 98-86-2        | NE                  | NE                      | 7800                | 120000             | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Aniline                          | 62-53-3        | NE                  | NE                      | 95                  | 400                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Anthracene (SIM)                 | 120-12-7       | NE                  | NE                      | 18000               | 230000             | 0.047    |   | 0.0083 U |   | 0.82 U   |   | 0.55     |   | 0.0093 U  |   | 0.0080 U |   |
| B(a)P-TEQ                        | 50-32-8        | 0.07                | 1.54                    | 0.11                | 2.1                | 0.23     |   | 0.0029   |   | 2.48     |   | 3.74     |   | 0.00305 U |   | 0.0086   |   |
| Benzidine                        | 92-87-5        | NE                  | NE                      | 0.00053             | 0.01               | NA       |   | NA       |   | 3.2 U    |   | NA       |   | NA        |   | NA       |   |
| Benzo(a)anthracene (SIM)         | 56-55-3        | NE                  | NE                      | 1.1                 | 21                 | 0.16     |   | 0.0021 U |   | 1.9      |   | 2.7      |   | 0.0023 U  |   | 0.0061   |   |
| Benzo(a)pyrene (SIM)             | 50-32-8        | 0.07                | 1.54                    | 0.11                | 2.1                | 0.14     |   | 0.0021 U |   | 1.4      |   | 2.7      |   | 0.0023 U  |   | 0.0057   |   |
| Benzo(b)fluoranthene (SIM)       | 205-99-2       | NE                  | NE                      | 1.1                 | 21                 | 0.28     |   | 0.0022   |   | 3.4      |   | 3.1      |   | 0.0023 U  |   | 0.0084   |   |
| Benzo(g,h,i)perylene (SIM)       | 191-24-2       | NE                  | NE                      | NE                  | NE                 | 0.12     |   | 0.021 U  |   | 0.97     |   | 1.1      |   | 0.023 U   |   | 0.020 U  |   |
| Benzo(k)fluoranthene (SIM)       | 207-08-9       | NE                  | NE                      | 11                  | 210                | 0.089    |   | 0.0083 U |   | 1.3      |   | 1.0      |   | 0.0093 U  |   | 0.0080 U |   |
| Benzoic Acid                     | 65-85-0        | NE                  | NE                      | 250000              | 3300000            | NA       |   | NA       |   | 4.8 U    |   | NA       |   | NA        |   | NA       |   |
| Bis(2-chloroethoxy)methane       | 111-91-1       | NE                  | NE                      | 190                 | 2500               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Bis(2-chloroethyl)ether          | 111-44-4       | NE                  | NE                      | 0.23                | 1                  | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Bis(2-chloroisopropyl)ether      | 108-60-1       | 2804                | 36274                   | 3100                | 47000              | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Bis(2-Ethylhexyl)phthalate       | 117-81-7       | 20                  | 120                     | 39                  | 160                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Butylbenzylphthalate             | 85-68-7        | NE                  | NE                      | 290                 | 1200               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Carbazole                        | 86-74-8        | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.82 U   |   | NA       |   | NA        |   | NA       |   |
| Chrysene (SIM)                   | 218-01-9       | NE                  | NE                      | 110                 | 2100               | 0.25     |   | 0.0083 U |   | 3.1      |   | 2.4      |   | 0.0093 U  |   | 0.0080 U |   |
| Dibenz(a,h)anthracene (SIM)      | 53-70-3        | NE                  | NE                      | 0.11                | 2.1                | 0.031    |   | 0.0021 U |   | 0.82 U   |   | 0.30     |   | 0.0023 U  |   | 0.0020 U |   |
| Dibenzofuran                     | 132-64-9       | NE                  | NE                      | 73                  | 1000               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |

Table B-2  
Semi-Volatile Organic Compound Analytical Results - Soil Samples

| Sample ID                            |          | VSS - Resident Soil | VSS - Non-Resident Soil | EPA Residential RSL | EPA Industrial RSL | SB-1-1.0 |   | SB-1-6.0 |   | SB-2-3.0 |   | SB-3-1.5 |   | SB-3-11.0 |   | SB-4-5.0 |   |
|--------------------------------------|----------|---------------------|-------------------------|---------------------|--------------------|----------|---|----------|---|----------|---|----------|---|-----------|---|----------|---|
| Sample Date                          | CAS#     | (mg/Kg)             | (mg/Kg)                 | (mg/Kg)             | (mg/Kg)            | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021  | Q | 7/6/2021 | Q |
| Diethylphthalate                     | 84-66-2  | NE                  | NE                      | 51000               | 660000             | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Dimethylphthalate                    | 131-11-3 | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Di-n-butylphthalate                  | 84-74-2  | NE                  | NE                      | 6300                | 82000              | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Di-n-octylphthalate                  | 117-84-0 | NE                  | NE                      | 630                 | 8200               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Fluoranthene (SIM)                   | 206-44-0 | 2301                | 26371                   | 2400                | 30000              | 0.34     |   | 0.021 U  |   | 7.7      |   | 6.1      |   | 0.023 U   |   | 0.020 U  |   |
| Fluorene (SIM)                       | 86-73-7  | 2301                | 26371                   | 2400                | 30000              | 0.15 U   |   | 0.042 U  |   | 0.82 U   |   | 0.16 U   |   | 0.046 U   |   | 0.040 U  |   |
| Hexachlorobenzene                    | 118-74-1 | 0.13                | 0.69                    | 0.21                | 0.96               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Hexachlorobutadiene                  | 87-68-3  | NE                  | NE                      | 1.2                 | 5.3                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Hexachlorocyclopentadiene            | 77-47-4  | NE                  | NE                      | 1.8                 | 7.5                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Hexachloroethane                     | 67-72-1  | NE                  | NE                      | 1.8                 | 8                  | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Indeno(1,2,3-cd)pyrene (SIM)         | 193-39-5 | NE                  | NE                      | 1.1                 | 21                 | 0.14     |   | 0.0083 U |   | 1.2      |   | 1.5      |   | 0.0093 U  |   | 0.0080 U |   |
| Isophorone                           | 78-59-1  | NE                  | NE                      | 570                 | 2400               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Naphthalene (SIM)                    | 91-20-3  | 2.7                 | 16                      | 2                   | 8.6                | 0.16     |   | 0.042 U  |   | 0.82 U   |   | 0.16 U   |   | 0.046 U   |   | 0.040 U  |   |
| Nitrobenzene                         | 98-95-3  | NE                  | NE                      | 5.1                 | 22                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| N-Nitrosodimethylamine               | 62-75-9  | NE                  | NE                      | 0.002               | 0.034              | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| N-Nitrosodi-n-propylamine            | 621-64-7 | NE                  | NE                      | 0.078               | 0.33               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| N-Nitrosodiphenylamine/Diphenylamine | 86-30-6  | NE                  | NE                      | 110                 | 470                | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Pentachloronitrobenzene              | 82-68-8  | NE                  | NE                      | 2.7                 | 13                 | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Pentachlorophenol                    | 87-86-5  | 0.48                | 2.9                     | 1                   | 4                  | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Phenanthrene (SIM)                   | 85-01-8  | NE                  | NE                      | NE                  | NE                 | 0.31     |   | 0.010 U  |   | 2.6      |   | 1.4      |   | 0.012 U   |   | 0.010 U  |   |
| Phenol                               | 108-95-2 | NE                  | NE                      | 19000               | 250000             | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |
| Pyrene (SIM)                         | 129-00-0 | NE                  | NE                      | 1800                | 23000              | 0.29     |   | 0.042 U  |   | 5.1      |   | 4.5      |   | 0.046 U   |   | 0.040 U  |   |
| Pyridine                             | 110-86-1 | NE                  | NE                      | 78                  | 1200               | NA       |   | NA       |   | 1.6 U    |   | NA       |   | NA        |   | NA       |   |

Table B-2  
Semi-Volatile Organic Compound Analytical Results - Soil Samples

| Sample ID                        |                | VSS -         | VSS - Non-    | EPA             | EPA            |          |   |          |   |           |   |          |   |             |   |          |   |     |
|----------------------------------|----------------|---------------|---------------|-----------------|----------------|----------|---|----------|---|-----------|---|----------|---|-------------|---|----------|---|-----|
| Sample Date                      | CAS#           | Resident Soil | Resident Soil | Residential RSL | Industrial RSL | SB-5-1.5 | Q | SB-5-7.5 | Q | SB-6-13.0 | Q | SB-7-3.0 | Q | SB-7-3.0-FD | Q | SB-7-6.0 | Q | RPD |
|                                  |                | (mg/Kg)       | (mg/Kg)       | (mg/Kg)         | (mg/Kg)        | 7/6/2021 |   | 7/6/2021 |   | 7/6/2021  |   | 7/6/2021 |   | 7/6/2021    |   | 7/6/2021 |   |     |
| 1,2,4,5-Tetrachlorobenzene       | 95-94-3        | NE            | NE            | 23              | 350            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 1,2,4-Trichlorobenzene           | 120-82-1       | NE            | NE            | 24              | 110            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 1,2-Dichlorobenzene              | 95-50-1        | NE            | NE            | 1800            | 9300           | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 1,2-Diphenylhydrazine/Azobenzene | 122-66-7       | NE            | NE            | 0.68            | 2.9            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 1,3-Dichlorobenzene              | 541-73-1       | NE            | NE            | NE              | NE             | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 1,4-Dichlorobenzene              | 106-46-7       | NE            | NE            | 2.6             | 11             | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 1-Methylnaphthalene              | 90-12-0        | NE            | NE            | 18              | 73             | NA       |   | NA       |   | 3.9       |   | NA       |   | NA          |   | NA       |   | -   |
| 2,4,5-Trichlorophenol            | 95-95-4        | NE            | NE            | 6300            | 82000          | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2,4,6-Trichlorophenol            | 88-06-2        | NE            | NE            | 49              | 210            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2,4-Dichlorophenol               | 120-83-2       | NE            | NE            | 190             | 2500           | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2,4-Dimethylphenol               | 105-67-9       | NE            | NE            | 1300            | 16000          | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2,4-Dinitrophenol                | 51-28-5        | NE            | NE            | 130             | 1600           | NA       |   | NA       |   | 0.93 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2,4-Dinitrotoluene               | 121-14-2       | NE            | NE            | 1.7             | 7.4            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2,6-Dinitrotoluene               | 606-20-2       | NE            | NE            | 0.36            | 1.5            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2-Chloronaphthalene              | 91-58-7        | NE            | NE            | 4800            | 60000          | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2-Chlorophenol                   | 95-57-8        | NE            | NE            | 390             | 5800           | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2-Methylnaphthalene (SIM)        | 91-57-6        | NE            | NE            | 240             | 3000           | 0.15 U   |   | 0.16 U   |   | 9.7       |   | 0.15 U   |   | 0.15 U      |   | 0.20 U   |   | -   |
| 2-Methylphenol                   | 95-48-7        | NE            | NE            | 3200            | 41000          | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2-Nitroaniline                   | 88-74-4        | NE            | NE            | 630             | 8000           | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 2-Nitrophenol                    | 88-75-5        | NE            | NE            | NE              | NE             | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 3,3-Dichlorobenzidine            | 91-94-1        | NE            | NE            | 1.2             | 5.1            | NA       |   | NA       |   | 0.24 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 3/4-Methylphenol                 | 108-39-4/106-4 | NE            | NE            | NE              | NE             | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 3-Nitroaniline                   | 99-09-2        | NE            | NE            | NE              | NE             | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 4,6-Dinitro-2-methylphenol       | 534-52-1       | NE            | NE            | 5.1             | 66             | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 4-Bromophenylphenylether         | 101-55-3       | NE            | NE            | NE              | NE             | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 4-Chloro-3-methylphenol          | 59-50-7        | NE            | NE            | 6300            | 82000          | NA       |   | NA       |   | 0.93 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 4-Chloroaniline                  | 106-47-8       | NE            | NE            | 2.7             | 11             | NA       |   | NA       |   | 0.93 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 4-Chlorophenylphenylether        | 7005-72-3      | NE            | NE            | NE              | NE             | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 4-Nitroaniline                   | 100-01-6       | NE            | NE            | 27              | 110            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| 4-Nitrophenol                    | 100-02-7       | NE            | NE            | NE              | NE             | NA       |   | NA       |   | 0.93 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Acenaphthene (SIM)               | 83-32-9        | NE            | NE            | 3600            | 45000          | 0.038 U  |   | 0.040 U  |   | 0.24 U    |   | 0.038 U  |   | 0.038 U     |   | 0.050 U  |   | -   |
| Acenaphthylene (SIM)             | 208-96-8       | NE            | NE            | NE              | NE             | 0.038 U  |   | 0.041    |   | 0.24 U    |   | 0.038 U  |   | 0.038 U     |   | 0.050 U  |   | -   |
| Acetophenone                     | 98-86-2        | NE            | NE            | 7800            | 120000         | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Aniline                          | 62-53-3        | NE            | NE            | 95              | 400            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Anthracene (SIM)                 | 120-12-7       | NE            | NE            | 18000           | 230000         | 0.030 U  |   | 0.14     |   | 0.24 U    |   | 0.031 U  |   | 0.030 U     |   | 0.040 U  |   | -   |
| B(a)P-TEQ                        | 50-32-8        | 0.07          | 1.54          | 0.11            | 2.1            | 0.138    |   | 0.35     |   | 0.277 U   |   | 0.289    |   | 0.249       |   | 0.0131 U |   | 15% |
| Benzidine                        | 92-87-5        | NE            | NE            | 0.00053         | 0.01           | NA       |   | NA       |   | 0.93 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Benzo(a)anthracene (SIM)         | 56-55-3        | NE            | NE            | 1.1             | 21             | 0.083    |   | 0.30     |   | 0.24 U    |   | 0.18     |   | 0.15        |   | 0.0099 U |   | 18% |
| Benzo(a)pyrene (SIM)             | 50-32-8        | 0.07          | 1.54          | 0.11            | 2.1            | 0.083    |   | 0.24     |   | 0.24 U    |   | 0.19     |   | 0.16        |   | 0.0099 U |   | 17% |
| Benzo(b)fluoranthene (SIM)       | 205-99-2       | NE            | NE            | 1.1             | 21             | 0.15     |   | 0.29     |   | 0.24 U    |   | 0.30     |   | 0.26        |   | 0.0099 U |   | 14% |
| Benzo(g,h,i)perylene (SIM)       | 191-24-2       | NE            | NE            | NE              | NE             | 0.23     |   | 0.13     |   | 0.24 U    |   | 0.14     |   | 0.12        |   | 0.099 U  |   | 15% |
| Benzo(k)fluoranthene (SIM)       | 207-08-9       | NE            | NE            | 11              | 210            | 0.050    |   | 0.11     |   | 0.24 U    |   | 0.11     |   | 0.096       |   | 0.040 U  |   | 14% |
| Benzoic Acid                     | 65-85-0        | NE            | NE            | 250000          | 3300000        | NA       |   | NA       |   | 1.4 U     |   | NA       |   | NA          |   | NA       |   | -   |
| Bis(2-chloroethoxy)methane       | 111-91-1       | NE            | NE            | 190             | 2500           | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Bis(2-chloroethyl)ether          | 111-44-4       | NE            | NE            | 0.23            | 1              | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Bis(2-chloroisopropyl)ether      | 108-60-1       | 2804          | 36274         | 3100            | 47000          | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Bis(2-Ethylhexyl)phthalate       | 117-81-7       | 20            | 120           | 39              | 160            | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Butylbenzylphthalate             | 85-68-7        | NE            | NE            | 290             | 1200           | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Carbazole                        | 86-74-8        | NE            | NE            | NE              | NE             | NA       |   | NA       |   | 0.24 U    |   | NA       |   | NA          |   | NA       |   | -   |
| Chrysene (SIM)                   | 218-01-9       | NE            | NE            | 110             | 2100           | 0.12     |   | 0.28     |   | 0.24 U    |   | 0.22     |   | 0.19        |   | 0.040 U  |   | 15% |
| Dibenz(a,h)anthracene (SIM)      | 53-70-3        | NE            | NE            | 0.11            | 2.1            | 0.021    |   | 0.034    |   | 0.24 U    |   | 0.034    |   | 0.032       |   | 0.0099 U |   | 6%  |
| Dibenzofuran                     | 132-64-9       | NE            | NE            | 73              | 1000           | NA       |   | NA       |   | 0.48 U    |   | NA       |   | NA          |   | NA       |   | -   |

Table B-2  
Semi-Volatile Organic Compound Analytical Results - Soil Samples

| Sample ID                            |          | VSS - Resident Soil | VSS - Non-Resident Soil | EPA Residential RSL | EPA Industrial RSL | SB-5-1.5     |   | SB-5-7.5    |   | SB-6-13.0   |   | SB-7-3.0    |   | SB-7-3.0-FD |   | SB-7-6.0 |   | RPD |
|--------------------------------------|----------|---------------------|-------------------------|---------------------|--------------------|--------------|---|-------------|---|-------------|---|-------------|---|-------------|---|----------|---|-----|
| Sample Date                          | CAS#     | (mg/Kg)             | (mg/Kg)                 | (mg/Kg)             | (mg/Kg)            | 7/6/2021     | Q | 7/6/2021    | Q | 7/6/2021    | Q | 7/6/2021    | Q | 7/6/2021    | Q | 7/6/2021 | Q |     |
| Diethylphthalate                     | 84-66-2  | NE                  | NE                      | 51000               | 660000             | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Dimethylphthalate                    | 131-11-3 | NE                  | NE                      | NE                  | NE                 | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Di-n-butylphthalate                  | 84-74-2  | NE                  | NE                      | 6300                | 82000              | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Di-n-octylphthalate                  | 117-84-0 | NE                  | NE                      | 630                 | 8200               | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Fluoranthene (SIM)                   | 206-44-0 | 2301                | 26371                   | 2400                | 30000              | <b>0.14</b>  |   | <b>0.69</b> |   | <b>0.28</b> |   | <b>0.28</b> |   | <b>0.22</b> |   | 0.099 U  |   | 24% |
| Fluorene (SIM)                       | 86-73-7  | 2301                | 26371                   | 2400                | 30000              | 0.15 U       |   | 0.16 U      |   | 0.24 U      |   | 0.15 U      |   | 0.15 U      |   | 0.20 U   |   | -   |
| Hexachlorobenzene                    | 118-74-1 | 0.13                | 0.69                    | 0.21                | 0.96               | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Hexachlorobutadiene                  | 87-68-3  | NE                  | NE                      | 1.2                 | 5.3                | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Hexachlorocyclopentadiene            | 77-47-4  | NE                  | NE                      | 1.8                 | 7.5                | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Hexachloroethane                     | 67-72-1  | NE                  | NE                      | 1.8                 | 8                  | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Indeno(1,2,3-cd)pyrene (SIM)         | 193-39-5 | NE                  | NE                      | 1.1                 | 21                 | <b>0.099</b> |   | <b>0.16</b> |   | 0.24 U      |   | <b>0.16</b> |   | <b>0.15</b> |   | 0.040 U  |   | 6%  |
| Isophorone                           | 78-59-1  | NE                  | NE                      | 570                 | 2400               | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Naphthalene (SIM)                    | 91-20-3  | 2.7                 | 16                      | 2                   | 8.6                | 0.15 U       |   | 0.16 U      |   | <b>11</b>   |   | 0.15 U      |   | 0.15 U      |   | 0.20 U   |   | -   |
| Nitrobenzene                         | 98-95-3  | NE                  | NE                      | 5.1                 | 22                 | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| N-Nitrosodimethylamine               | 62-75-9  | NE                  | NE                      | 0.002               | 0.034              | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| N-Nitrosodi-n-propylamine            | 621-64-7 | NE                  | NE                      | 0.078               | 0.33               | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| N-Nitrosodiphenylamine/Diphenylamine | 86-30-6  | NE                  | NE                      | 110                 | 470                | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Pentachloronitrobenzene              | 82-68-8  | NE                  | NE                      | 2.7                 | 13                 | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Pentachlorophenol                    | 87-86-5  | 0.48                | 2.9                     | 1                   | 4                  | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Phenanthrene (SIM)                   | 85-01-8  | NE                  | NE                      | NE                  | NE                 | <b>0.095</b> |   | <b>0.57</b> |   | <b>0.34</b> |   | <b>0.13</b> |   | <b>0.11</b> |   | 0.05 U   |   | 17% |
| Phenol                               | 108-95-2 | NE                  | NE                      | 19000               | 250000             | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |
| Pyrene (SIM)                         | 129-00-0 | NE                  | NE                      | 1800                | 23000              | 0.15 U       |   | <b>0.57</b> |   | <b>0.26</b> |   | <b>0.26</b> |   | <b>0.21</b> |   | 0.20 U   |   | 21% |
| Pyridine                             | 110-86-1 | NE                  | NE                      | 78                  | 1200               | NA           |   | NA          |   | 0.48 U      |   | NA          |   | NA          |   | NA       |   | -   |

Table B-2  
Semi-Volatile Organic Compound Analytical Results - Soil Samples

| Sample ID                        |                | VSS - Resident Soil | VSS - Non-Resident Soil | EPA Residential RSL | EPA Industrial RSL | SB-8-1.5 |   | SB-8-7.0 |   | SL-1     |   | SL-2     |   |
|----------------------------------|----------------|---------------------|-------------------------|---------------------|--------------------|----------|---|----------|---|----------|---|----------|---|
| Sample Date                      | CAS#           | (mg/Kg)             | (mg/Kg)                 | (mg/Kg)             | (mg/Kg)            | 7/6/2021 | Q | 7/6/2021 | Q | 7/7/2021 | Q | 7/7/2021 | Q |
| 1,2,4,5-Tetrachlorobenzene       | 95-94-3        | NE                  | NE                      | 23                  | 350                | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 1,2,4-Trichlorobenzene           | 120-82-1       | NE                  | NE                      | 24                  | 110                | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 1,2-Dichlorobenzene              | 95-50-1        | NE                  | NE                      | 1800                | 9300               | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 1,2-Diphenylhydrazine/Azobenzene | 122-66-7       | NE                  | NE                      | 0.68                | 2.9                | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 1,3-Dichlorobenzene              | 541-73-1       | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 1,4-Dichlorobenzene              | 106-46-7       | NE                  | NE                      | 2.6                 | 11                 | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 1-Methylnaphthalene              | 90-12-0        | NE                  | NE                      | 18                  | 73                 | NA       |   | NA       |   | 0.24 U   |   | 2.2 U    |   |
| 2,4,5-Trichlorophenol            | 95-95-4        | NE                  | NE                      | 6300                | 82000              | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2,4,6-Trichlorophenol            | 88-06-2        | NE                  | NE                      | 49                  | 210                | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2,4-Dichlorophenol               | 120-83-2       | NE                  | NE                      | 190                 | 2500               | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2,4-Dimethylphenol               | 105-67-9       | NE                  | NE                      | 1300                | 16000              | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2,4-Dinitrophenol                | 51-28-5        | NE                  | NE                      | 130                 | 1600               | NA       |   | NA       |   | 0.92 U   |   | 8.6 U    |   |
| 2,4-Dinitrotoluene               | 121-14-2       | NE                  | NE                      | 1.7                 | 7.4                | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2,6-Dinitrotoluene               | 606-20-2       | NE                  | NE                      | 0.36                | 1.5                | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2-Chloronaphthalene              | 91-58-7        | NE                  | NE                      | 4800                | 60000              | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2-Chlorophenol                   | 95-57-8        | NE                  | NE                      | 390                 | 5800               | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2-Methylnaphthalene (SIM)        | 91-57-6        | NE                  | NE                      | 240                 | 3000               | 0.16 U   |   | 0.19 U   |   | 0.24 U   |   | 2.2 U    |   |
| 2-Methylphenol                   | 95-48-7        | NE                  | NE                      | 3200                | 41000              | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2-Nitroaniline                   | 88-74-4        | NE                  | NE                      | 630                 | 8000               | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 2-Nitrophenol                    | 88-75-5        | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 3,3-Dichlorobenzidine            | 91-94-1        | NE                  | NE                      | 1.2                 | 5.1                | NA       |   | NA       |   | 0.24 U   |   | 2.2 U    |   |
| 3/4-Methylphenol                 | 108-39-4/106-4 | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.57     |   | 4.4 U    |   |
| 3-Nitroaniline                   | 99-09-2        | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 4,6-Dinitro-2-methylphenol       | 534-52-1       | NE                  | NE                      | 5.1                 | 66                 | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 4-Bromophenylphenylether         | 101-55-3       | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 4-Chloro-3-methylphenol          | 59-50-7        | NE                  | NE                      | 6300                | 82000              | NA       |   | NA       |   | 0.92 U   |   | 8.6 U    |   |
| 4-Chloroaniline                  | 106-47-8       | NE                  | NE                      | 2.7                 | 11                 | NA       |   | NA       |   | 0.92 U   |   | 8.6 U    |   |
| 4-Chlorophenylphenylether        | 7005-72-3      | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 4-Nitroaniline                   | 100-01-6       | NE                  | NE                      | 27                  | 110                | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| 4-Nitrophenol                    | 100-02-7       | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.92 U   |   | 8.6 U    |   |
| Acenaphthene (SIM)               | 83-32-9        | NE                  | NE                      | 3600                | 45000              | 0.039 U  |   | 0.049 U  |   | 0.24 U   |   | 2.2 U    |   |
| Acenaphthylene (SIM)             | 208-96-8       | NE                  | NE                      | NE                  | NE                 | 0.039 U  |   | 0.049 U  |   | 0.24 U   |   | 2.2 U    |   |
| Acetophenone                     | 98-86-2        | NE                  | NE                      | 7800                | 120000             | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| Aniline                          | 62-53-3        | NE                  | NE                      | 95                  | 400                | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| Anthracene (SIM)                 | 120-12-7       | NE                  | NE                      | 18000               | 230000             | 0.080    |   | 0.039 U  |   | 0.24 U   |   | 2.2 U    |   |
| B(a)P-TEQ                        | 50-32-8        | 0.07                | 1.54                    | 0.11                | 2.1                | 0.267    |   | 0.0129 U |   | 0.571    |   | 2.54 U   |   |
| Benzidine                        | 92-87-5        | NE                  | NE                      | 0.00053             | 0.01               | NA       |   | NA       |   | 0.92 U   |   | 8.6 U    |   |
| Benzo(a)anthracene (SIM)         | 56-55-3        | NE                  | NE                      | 1.1                 | 21                 | 0.21     |   | 0.0098 U |   | 0.30     |   | 2.2 U    |   |
| Benzo(a)pyrene (SIM)             | 50-32-8        | 0.07                | 1.54                    | 0.11                | 2.1                | 0.18     |   | 0.0098 U |   | 0.35     |   | 2.2 U    |   |
| Benzo(b)fluoranthene (SIM)       | 205-99-2       | NE                  | NE                      | 1.1                 | 21                 | 0.24     |   | 0.0098 U |   | 0.57     |   | 2.2 U    |   |
| Benzo(g,h,i)perylene (SIM)       | 191-24-2       | NE                  | NE                      | NE                  | NE                 | 0.11     |   | 0.098 U  |   | 0.24 U   |   | 2.2 U    |   |
| Benzo(k)fluoranthene (SIM)       | 207-08-9       | NE                  | NE                      | 11                  | 210                | 0.096    |   | 0.039 U  |   | 0.24 U   |   | 2.2 U    |   |
| Benzoic Acid                     | 65-85-0        | NE                  | NE                      | 250000              | 3300000            | NA       |   | NA       |   | 1.4 U    |   | 13 U     |   |
| Bis(2-chloroethoxy)methane       | 111-91-1       | NE                  | NE                      | 190                 | 2500               | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| Bis(2-chloroethyl)ether          | 111-44-4       | NE                  | NE                      | 0.23                | 1                  | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| Bis(2-chloroisopropyl)ether      | 108-60-1       | 2804                | 36274                   | 3100                | 47000              | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| Bis(2-Ethylhexyl)phthalate       | 117-81-7       | 20                  | 120                     | 39                  | 160                | NA       |   | NA       |   | 0.47 U   |   | 11       |   |
| Butylbenzylphthalate             | 85-68-7        | NE                  | NE                      | 290                 | 1200               | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |
| Carbazole                        | 86-74-8        | NE                  | NE                      | NE                  | NE                 | NA       |   | NA       |   | 0.24 U   |   | 2.2 U    |   |
| Chrysene (SIM)                   | 218-01-9       | NE                  | NE                      | 110                 | 2100               | 0.23     |   | 0.039 U  |   | 0.33     |   | 2.2 U    |   |
| Dibenz(a,h)anthracene (SIM)      | 53-70-3        | NE                  | NE                      | 0.11                | 2.1                | 0.028    |   | 0.0098 U |   | 0.24 U   |   | 2.2 U    |   |
| Dibenzofuran                     | 132-64-9       | NE                  | NE                      | 73                  | 1000               | NA       |   | NA       |   | 0.47 U   |   | 4.4 U    |   |

Table B-2  
Semi-Volatile Organic Compound Analytical Results - Soil Samples

| Sample ID                            |          | VSS -         | VSS - Non-    | EPA             | EPA            |             |   |          |   |             |   |            |   |
|--------------------------------------|----------|---------------|---------------|-----------------|----------------|-------------|---|----------|---|-------------|---|------------|---|
| Sample Date                          | CAS#     | Resident Soil | Resident Soil | Residential RSL | Industrial RSL | SB-8-1.5    | Q | SB-8-7.0 | Q | SL-1        | Q | SL-2       | Q |
|                                      |          | (mg/Kg)       | (mg/Kg)       | (mg/Kg)         | (mg/Kg)        | 7/6/2021    |   | 7/6/2021 |   | 7/7/2021    |   | 7/7/2021   |   |
| Diethylphthalate                     | 84-66-2  | NE            | NE            | 51000           | 660000         | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Dimethylphthalate                    | 131-11-3 | NE            | NE            | NE              | NE             | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Di-n-butylphthalate                  | 84-74-2  | NE            | NE            | 6300            | 82000          | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Di-n-octylphthalate                  | 117-84-0 | NE            | NE            | 630             | 8200           | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Fluoranthene (SIM)                   | 206-44-0 | 2301          | 26371         | 2400            | 30000          | <b>0.45</b> |   | 0.098 U  |   | <b>0.40</b> |   | 2.2 U      |   |
| Fluorene (SIM)                       | 86-73-7  | 2301          | 26371         | 2400            | 30000          | 0.16 U      |   | 0.19 U   |   | 0.24 U      |   | 2.2 U      |   |
| Hexachlorobenzene                    | 118-74-1 | 0.13          | 0.69          | 0.21            | 0.96           | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Hexachlorobutadiene                  | 87-68-3  | NE            | NE            | 1.2             | 5.3            | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Hexachlorocyclopentadiene            | 77-47-4  | NE            | NE            | 1.8             | 7.5            | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Hexachloroethane                     | 67-72-1  | NE            | NE            | 1.8             | 8              | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Indeno(1,2,3-cd)pyrene (SIM)         | 193-39-5 | NE            | NE            | 1.1             | 21             | <b>0.13</b> |   | 0.039 U  |   | 0.24 U      |   | 2.2 U      |   |
| Isophorone                           | 78-59-1  | NE            | NE            | 570             | 2400           | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Naphthalene (SIM)                    | 91-20-3  | 2.7           | 16            | 2               | 8.6            | 0.16 U      |   | 0.19 U   |   | 0.24 U      |   | 2.2 U      |   |
| Nitrobenzene                         | 98-95-3  | NE            | NE            | 5.1             | 22             | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| N-Nitrosodimethylamine               | 62-75-9  | NE            | NE            | 0.002           | 0.034          | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| N-Nitrosodi-n-propylamine            | 621-64-7 | NE            | NE            | 0.078           | 0.33           | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| N-Nitrosodiphenylamine/Diphenylamine | 86-30-6  | NE            | NE            | 110             | 470            | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Pentachloronitrobenzene              | 82-68-8  | NE            | NE            | 2.7             | 13             | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Pentachlorophenol                    | 87-86-5  | 0.48          | 2.9           | 1               | 4              | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Phenanthrene (SIM)                   | 85-01-8  | NE            | NE            | NE              | NE             | <b>0.36</b> |   | 0.049 U  |   | 0.24 U      |   | 2.2 U      |   |
| Phenol                               | 108-95-2 | NE            | NE            | 19000           | 250000         | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |
| Pyrene (SIM)                         | 129-00-0 | NE            | NE            | 1800            | 23000          | <b>0.39</b> |   | 0.19 U   |   | <b>0.48</b> |   | <b>2.7</b> |   |
| Pyridine                             | 110-86-1 | NE            | NE            | 78              | 1200           | NA          |   | NA       |   | 0.47 U      |   | 4.4 U      |   |

Key:

Vermont Soil Standards from Investigation and Remediation of Contaminated Properties Rule, July 2019

RSL - US Environmental Protection Agency, Regional Screening Levels for Residential (Res) and Industrial (Ind) settings, November 2020

B(a)P-TEQ - Total carcinogenic PAH calculated as benzo(a)pyrene Toxicity Equivalency Quotient, using Toxicity Equivalency Factors (source: EPA RSL User Guide)

mg/kg - milligrams per kilogram (parts per million)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedance of the residential enforcement standard; defaults to EPA RSL if VSS not established

Italicized results indicate an exceedance of the non-residential enforcement standard; defaults to EPA RSL if VSS not established

NE - screening level not established

NA - Analyte not analyzed

U - Analyte not detected; limit of quantitation listed

RPD - Relative percent difference

Table B-1  
Volatile Organic Compound Analytical Results – Soil Samples

| Sample ID                                         |            | VSS - Resident | VSS - Non-Resident | EPA Residential RSL | EPA Industrial RSL | SB-3-1.5  |   | SB-4-2.0  |   | SB-6-13.0 |   | SB-6-3.5 |   | SB-6-3.5-FD |   | SB-6-8.7 |   | RPD |
|---------------------------------------------------|------------|----------------|--------------------|---------------------|--------------------|-----------|---|-----------|---|-----------|---|----------|---|-------------|---|----------|---|-----|
| Sample Date                                       | CAS#       | (mg/Kg)        | (mg/Kg)            | (mg/Kg)             | (mg/Kg)            | 7/6/2021  | Q | 7/6/2021  | Q | 7/6/2021  | Q | 7/6/2021 | Q | 7/6/2021    | Q | 7/6/2021 | Q |     |
| 1,1,1,2-Tetrachloroethane                         | 630-20-6   | 1.3            | 8                  | 2                   | 8.8                | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,1,1-Trichloroethane                             | 71-55-6    | NE             | NE                 | 8100                | 36000              | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,1,2,2-Tetrachloroethane                         | 79-34-5    | NE             | NE                 | 0.6                 | 2.7                | 0.00084 U |   | 0.00073 U |   | 19 U      |   | 3.7 U    |   | 3.9 U       |   | 0.48 U   |   | -   |
| 1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113) | 76-13-1    | NE             | NE                 | 6700                | 28000              | 0.0084 U  |   | 0.0073 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,1,2-Trichloroethane                             | 79-00-5    | NE             | NE                 | 1.1                 | 5                  | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,1-Dichloroethane                                | 75-34-3    | 2.1            | 13                 | 3.6                 | 16                 | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,1-Dichloroethylene                              | 75-35-4    | NE             | NE                 | 230                 | 1000               | 0.0034 U  |   | 0.0029 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,1-Dichloropropene                               | 563-58-6   | NE             | NE                 | NE                  | NE                 | 0.0017 U  |   | 0.0015 U  |   | 76 U      |   | 15 U     |   | 16 U        |   | 1.9 U    |   | -   |
| 1,2,3-Trichlorobenzene                            | 87-61-6    | NE             | NE                 | 63                  | 930                | 0.0017 U  |   | 0.0015 U  |   | 190 U     |   | 37 U     |   | 39 U        |   | 4.8 U    |   | -   |
| 1,2,3-Trichloropropane                            | 96-18-4    | 0.00311        | 0.07               | 0.0051              | 0.11               | 0.0017 U  |   | 0.0015 U  |   | 76 U      |   | 15 U     |   | 16 U        |   | 1.9 U    |   | -   |
| 1,2,4-Trichlorobenzene                            | 120-82-1   | NE             | NE                 | 24                  | 110                | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,2,4-Trimethylbenzene                            | 95-63-6    | 144            | 177                | 300                 | 1800               | 0.0017 U  |   | 0.0015 U  |   | 760       |   | 330      |   | 490         |   | 73       |   | 39% |
| 1,2-Dibromo-3-chloropropane (DBCP)                | 96-12-8    | 0.01           | 0.06               | 0.0053              | 0.064              | 0.0017 U  |   | 0.0015 U  |   | 190 U     |   | 37 U     |   | 39 U        |   | 4.8 U    |   | -   |
| 1,2-Dibromoethane (EDB)                           | 106-93-4   | 0.02           | 0.14               | 0.036               | 0.16               | 0.00084 U |   | 0.00073 U |   | 19 U      |   | 3.7 U    |   | 3.9 U       |   | 0.48 U   |   | -   |
| 1,2-Dichlorobenzene                               | 95-50-1    | NE             | NE                 | 1800                | 9300               | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,2-Dichloroethane                                | 107-06-2   | 0.29           | 1.7                | 0.46                | 2                  | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,2-Dichloropropane                               | 78-87-5    | 1.5            | 9.1                | 2.5                 | 11                 | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,3,5-Trichlorobenzene                            | 108-70-3   | NE             | NE                 | NE                  | NE                 | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,3,5-Trimethylbenzene                            | 108-67-8   | 144            | 177                | 270                 | 1500               | 0.0017 U  |   | 0.0015 U  |   | 240       |   | 110      |   | 160         |   | 23       |   | 37% |
| 1,3-Dichlorobenzene                               | 541-73-1   | NE             | NE                 | NE                  | NE                 | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,3-Dichloropropane                               | 142-28-9   | NE             | NE                 | 1600                | 23000              | 0.00084 U |   | 0.00073 U |   | 19 U      |   | 3.7 U    |   | 3.9 U       |   | 0.48 U   |   | -   |
| 1,4-Dichlorobenzene                               | 106-46-7   | NE             | NE                 | 2.6                 | 11                 | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 1,4-Dioxane                                       | 123-91-1   | 2.8            | 17                 | 5.3                 | 24                 | 0.084 U   |   | 0.073 U   |   | 1900 U    |   | 370 U    |   | 390 U       |   | 48 U     |   | -   |
| 2,2-Dichloropropane                               | 594-20-7   | NE             | NE                 | NE                  | NE                 | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 2-Butanone (MEK)                                  | 78-93-3    | 16952          | 26991              | 27000               | 190000             | 0.034 U   |   | 0.029 U   |   | 760 U     |   | 150 U    |   | 160 U       |   | 19 U     |   | -   |
| 2-Chlorotoluene                                   | 95-49-8    | NE             | NE                 | 1600                | 23000              | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 2-Hexanone (MBK)                                  | 591-78-6   | NE             | NE                 | 200                 | 1300               | 0.017 U   |   | 0.015 U   |   | 380 U     |   | 75 U     |   | 78 U        |   | 9.6 U    |   | -   |
| 4-Chlorotoluene                                   | 106-43-4   | NE             | NE                 | 1600                | 23000              | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| 4-Methyl-2-pentanone (MIBK)                       | 108-10-1   | NE             | NE                 | 33000               | 140000             | 0.017 U   |   | 0.015 U   |   | 380 U     |   | 75 U     |   | 78 U        |   | 9.6 U    |   | -   |
| Acetone                                           | 67-64-1    | 40609          | 100028             | 61000               | 670000             | 0.084 U   |   | 0.073 U   |   | 1900 U    |   | 370 U    |   | 390 U       |   | 48 U     |   | -   |
| Acrylonitrile                                     | 107-13-1   | NE             | NE                 | 0.25                | 1.1                | 0.0051 U  |   | 0.0044 U  |   | 190 U     |   | 37 U     |   | 39 U        |   | 4.8 U    |   | -   |
| Benzene                                           | 71-43-2    | 0.7            | 4.2                | 1.2                 | 5.1                | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| Bromobenzene                                      | 108-86-1   | NE             | NE                 | 290                 | 1800               | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| Bromochloromethane                                | 74-97-5    | 193            | 597                | 150                 | 630                | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| Bromodichloromethane                              | 75-27-4    | NE             | NE                 | 0.29                | 1.3                | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| Bromoform                                         | 75-25-2    | NE             | NE                 | 19                  | 86                 | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| Bromomethane                                      | 74-83-9    | NE             | NE                 | 6.8                 | 30                 | 0.0084 U  |   | 0.0073 U  |   | 76 U      |   | 15 U     |   | 16 U        |   | 1.9 U    |   | -   |
| Carbon Disulfide                                  | 75-15-0    | 608            | 662                | 770                 | 3500               | 0.0051 U  |   | 0.0044 U  |   | 190 U     |   | 37 U     |   | 39 U        |   | 4.8 U    |   | -   |
| Carbon Tetrachloride                              | 56-23-5    | 0.37           | 2.2                | 0.65                | 2.9                | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| Chlorobenzene                                     | 108-90-7   | 414            | 726                | 280                 | 1300               | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| Chlorodibromomethane                              | 124-48-1   | NE             | NE                 | 8.3                 | 39                 | 0.00084 U |   | 0.00073 U |   | 19 U      |   | 3.7 U    |   | 3.9 U       |   | 0.48 U   |   | -   |
| Chloroethane                                      | 75-00-3    | NE             | NE                 | 14000               | 57000              | 0.017 U   |   | 0.015 U   |   | 76 U      |   | 15 U     |   | 16 U        |   | 1.9 U    |   | -   |
| Chloroform                                        | 67-66-3    | NE             | NE                 | 0.32                | 1.4                | 0.0034 U  |   | 0.0029 U  |   | 76 U      |   | 15 U     |   | 16 U        |   | 1.9 U    |   | -   |
| Chloromethane                                     | 74-87-3    | NE             | NE                 | 110                 | 460                | 0.0084 U  |   | 0.0073 U  |   | 38000 U   |   | 7500 U   |   | 7800 U      |   | 960 U    |   | -   |
| cis-1,2-Dichloroethylene                          | 156-59-2   | 140            | 1814               | 160                 | 2300               | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| cis-1,3-Dichloropropene                           | 10061-01-5 | NE             | NE                 | NE                  | NE                 | 0.00084 U |   | 0.00073 U |   | 19 U      |   | 3.7 U    |   | 3.9 U       |   | 0.48 U   |   | -   |
| Dibromomethane                                    | 74-95-3    | NE             | NE                 | 24                  | 99                 | 0.0017 U  |   | 0.0015 U  |   | 38 U      |   | 7.5 U    |   | 7.8 U       |   | 0.96 U   |   | -   |
| Dichlorodifluoromethane (Freon 12)                | 75-71-8    | NE             | NE                 | 87                  | 370                | 0.017 U   |   | 0.015 U   |   | 76 U      |   | 15 U     |   | 16 U        |   | 1.9 U    |   | -   |

Table B-1  
Volatile Organic Compound Analytical Results – Soil Samples

| Sample ID                         |              | VSS - Resident | VSS - Non-Resident | EPA Residential RSL | EPA Industrial RSL | SB-3-1.5  |   | SB-4-2.0  |   | SB-6-13.0   |   | SB-6-3.5     |   | SB-6-3.5-FD  |   | SB-6-8.7     |   | RPD |
|-----------------------------------|--------------|----------------|--------------------|---------------------|--------------------|-----------|---|-----------|---|-------------|---|--------------|---|--------------|---|--------------|---|-----|
| Sample Date                       | CAS#         | (mg/Kg)        | (mg/Kg)            | (mg/Kg)             | (mg/Kg)            | 7/6/2021  | Q | 7/6/2021  | Q | 7/6/2021    | Q | 7/6/2021     | Q | 7/6/2021     | Q | 7/6/2021     | Q |     |
| Diethyl Ether                     | 60-29-7      | NE             | NE                 | 16000               | 230000             | 0.017 U   |   | 0.015 U   |   | 76 U        |   | 15 U         |   | 16 U         |   | 1.9 U        |   | -   |
| Diisopropyl Ether (DIPE)          | 108-20-3     | NE             | NE                 | 2200                | 9400               | 0.00084 U |   | 0.00073 U |   | 19 U        |   | 3.7 U        |   | 3.9 U        |   | 0.48 U       |   | -   |
| Ethylbenzene                      | 100-41-4     | 3.7            | 22                 | 5.8                 | 25                 | 0.0017 U  |   | 0.0015 U  |   | <b>380</b>  |   | <b>9.7</b>   |   | <b>13</b>    |   | <b>22</b>    |   | 29% |
| Hexachlorobutadiene               | 87-68-3      | NE             | NE                 | 1.2                 | 5.3                | 0.0017 U  |   | 0.0015 U  |   | 38 U        |   | 7.5 U        |   | 7.8 U        |   | 0.96 U       |   | -   |
| Isopropylbenzene (Cumene)         | 98-82-8      | 256            | 264                | 1900                | 9900               | 0.0017 U  |   | 0.0015 U  |   | <b>57</b>   |   | 7.5 U        |   | <b>9.0</b>   |   | <b>4.5</b>   |   | -   |
| m+p Xylene                        | 108383/10642 | NE             | NE                 | NE                  | NE                 | 0.0034 U  |   | 0.0029 U  |   | <b>1700</b> |   | <b>62</b>    |   | <b>88</b>    |   | <b>96</b>    |   | 35% |
| Methyl Acetate                    | 79-20-9      | NE             | NE                 | 78000               | 1200000            | 0.0034 U  |   | 0.0029 U  |   | 380 U       |   | 75 U         |   | 78 U         |   | 9.6 U        |   | -   |
| Methyl Cyclohexane                | 108-87-2     | NE             | NE                 | NE                  | NE                 | 0.0017 U  |   | 0.0015 U  |   | <b>69</b>   |   | 7.5 U        |   | 7.8 U        |   | <b>5.3</b>   |   | -   |
| Methyl tert-Butyl Ether (MTBE)    | 1634-04-4    | 649            | 4464               | 47                  | 210                | 0.0034 U  |   | 0.0029 U  |   | 38 U        |   | 7.5 U        |   | 7.8 U        |   | 0.96 U       |   | -   |
| Methylene Chloride                | 75-09-2      | NE             | NE                 | 57                  | 1000               | 0.017 U   |   | 0.015 U   |   | 190 U       |   | 37 U         |   | 39 U         |   | 4.8 U        |   | -   |
| Naphthalene                       | 91-20-3      | 2.7            | 16                 | 2                   | 8.6                | 0.0034 U  |   | 0.0029 U  |   | <b>84</b>   |   | <b>47</b>    |   | <b>67</b>    |   | <b>6.8</b>   |   | 35% |
| n-Butylbenzene                    | 104-51-8     | 3504           | 51100              | 3900                | 58000              | 0.0017 U  |   | 0.0015 U  |   | <b>55</b>   |   | <b>30</b>    |   | <b>47</b>    |   | <b>5.3</b>   |   | 44% |
| n-Propylbenzene                   | 103-65-1     | 253            | 261                | 3800                | 24000              | 0.0017 U  |   | 0.0015 U  |   | <b>130</b>  |   | <b>22</b>    |   | <b>33</b>    |   | <b>11</b>    |   | 40% |
| o-Xylene                          | 95-47-6      | NE             | NE                 | 650                 | 2800               | 0.0017 U  |   | 0.0015 U  |   | <b>300</b>  |   | 7.5 U        |   | 7.8 U        |   | <b>11</b>    |   | -   |
| p-Isopropyltoluene (p-Cymene)     | 99-87-6      | NE             | NE                 | NE                  | NE                 | 0.0017 U  |   | 0.0015 U  |   | 38 U        |   | 7.5 U        |   | <b>8.8</b>   |   | <b>2.5</b>   |   | -   |
| sec-Butylbenzene                  | 135-98-8     | 7009           | 102200             | 7800                | 120000             | 0.0017 U  |   | 0.0015 U  |   | 38 U        |   | 7.5 U        |   | <b>9.8</b>   |   | <b>1.5</b>   |   | -   |
| Styrene                           | 100-42-5     | NE             | NE                 | 6000                | 35000              | 0.0017 U  |   | 0.0015 U  |   | 38 U        |   | 7.5 U        |   | 7.8 U        |   | 0.96 U       |   | -   |
| tert-Amyl Methyl Ether (TAME)     | 994-05-8     | NE             | NE                 | NE                  | NE                 | 0.00084 U |   | 0.00073 U |   | 19 U        |   | 3.7 U        |   | 3.9 U        |   | 0.48 U       |   | -   |
| tert-Butyl Alcohol (TBA)          | 75-65-0      | NE             | NE                 | NE                  | NE                 | 0.084 U   |   | 0.073 U   |   | 760 U       |   | 150 U        |   | 160 U        |   | 19 U         |   | -   |
| tert-Butyl Ethyl Ether (TBEE)     | 637-92-3     | NE             | NE                 | NE                  | NE                 | 0.00084 U |   | 0.00073 U |   | 19 U        |   | 3.7 U        |   | 3.9 U        |   | 0.48 U       |   | -   |
| tert-Butylbenzene                 | 98-06-6      | 7009           | 102200             | 7800                | 120000             | 0.0017 U  |   | 0.0015 U  |   | 38 U        |   | 7.5 U        |   | 7.8 U        |   | 0.96 U       |   | -   |
| Tetrachloroethylene               | 127-18-4     | 2.4            | 14                 | 24                  | 100                | 0.0017 U  |   | 0.0015 U  |   | <b>38 U</b> |   | <b>7.5 U</b> |   | <b>7.8 U</b> |   | 0.96 U       |   | -   |
| Tetrahydrofuran                   | 109-99-9     | NE             | NE                 | 18000               | 94000              | 0.0084 U  |   | 0.0073 U  |   | 380 U       |   | 75 U         |   | 78 U         |   | 9.6 U        |   | -   |
| Toluene                           | 108-88-3     | 706            | 798                | 4900                | 47000              | 0.0017 U  |   | 0.0015 U  |   | <b>91</b>   |   | 7.5 U        |   | 7.8 U        |   | <b>2.9</b>   |   | -   |
| Total Trimethylbenzene            | 25551-13-7   | NE             | NE                 | NE                  | NE                 | 0.0017 U  |   | 0.0015 U  |   | <b>1000</b> |   | <b>440</b>   |   | <b>650</b>   |   | <b>96</b>    |   | 39% |
| Total Xylene                      | 1330-20-7    | 252            | 257                | 580                 | 2500               | 0.0034 U  |   | 0.0029 U  |   | <b>2000</b> |   | <b>62</b>    |   | <b>88</b>    |   | <b>107</b>   |   | 35% |
| trans-1,2-Dichloroethylene        | 156-60-5     | 1402           | 18137              | 70                  | 300                | 0.0017 U  |   | 0.0015 U  |   | 38 U        |   | 7.5 U        |   | 7.8 U        |   | 0.96 U       |   | -   |
| trans-1,3-Dichloropropene         | 10061-02-6   | NE             | NE                 | NE                  | NE                 | 0.00084 U |   | 0.00073 U |   | 19 U        |   | 3.7 U        |   | 3.9 U        |   | 0.48 U       |   | -   |
| trans-1,4-Dichloro-2-butene       | 110-57-6     | NE             | NE                 | 0.0074              | 0.032              | 0.0034 U  |   | 0.0029 U  |   | <b>76 U</b> |   | <b>15 U</b>  |   | <b>16 U</b>  |   | <b>1.9 U</b> |   | -   |
| Trichloroethylene                 | 79-01-6      | 0.68           | 6.5                | 0.94                | 6                  | 0.0017 U  |   | 0.0015 U  |   | <b>38 U</b> |   | <b>7.5 U</b> |   | <b>7.8 U</b> |   | 0.96 U       |   | -   |
| Trichlorofluoromethane (Freon 11) | 75-69-4      | NE             | NE                 | 23000               | 350000             | 0.0084 U  |   | 0.0073 U  |   | 76 U        |   | 15 U         |   | 16 U         |   | 1.9 U        |   | -   |
| Vinyl Chloride                    | 75-01-4      | 0.1            | 0.59               | 0.059               | 1.7                | 0.0084 U  |   | 0.0073 U  |   | <b>76 U</b> |   | <b>15 U</b>  |   | <b>16 U</b>  |   | <b>1.9 U</b> |   | -   |

Table B-1  
Volatile Organic Compound Analytical Results – Soil Samples

| Sample ID                                         |            | VSS - Resident | VSS - Non-Resident | EPA Residential RSL | EPA Industrial RSL | Trip Blank |   | SL-3     |   | SL-4     |   |
|---------------------------------------------------|------------|----------------|--------------------|---------------------|--------------------|------------|---|----------|---|----------|---|
| Sample Date                                       | CAS#       | (mg/Kg)        | (mg/Kg)            | (mg/Kg)             | (mg/Kg)            | 7/7/2021   | Q | 3/1/2022 | Q | 3/1/2022 | Q |
| 1,1,1,2-Tetrachloroethane                         | 630-20-6   | 1.3            | 8                  | 2                   | 8.8                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,1,1-Trichloroethane                             | 71-55-6    | NE             | NE                 | 8100                | 36000              | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,1,2,2-Tetrachloroethane                         | 79-34-5    | NE             | NE                 | 0.6                 | 2.7                | 0.0010     | U | 0.0062   | U | 0.004    | U |
| 1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113) | 76-13-1    | NE             | NE                 | 6700                | 28000              | 0.010      | U | NA       |   | NA       |   |
| 1,1,2-Trichloroethane                             | 79-00-5    | NE             | NE                 | 1.1                 | 5                  | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,1-Dichloroethane                                | 75-34-3    | 2.1            | 13                 | 3.6                 | 16                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,1-Dichloroethylene                              | 75-35-4    | NE             | NE                 | 230                 | 1000               | 0.0040     | U | 0.010    | U | 0.0067   | U |
| 1,1-Dichloropropene                               | 563-58-6   | NE             | NE                 | NE                  | NE                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,2,3-Trichlorobenzene                            | 87-61-6    | NE             | NE                 | 63                  | 930                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,2,3-Trichloropropane                            | 96-18-4    | 0.00311        | 0.07               | 0.0051              | 0.11               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,2,4-Trichlorobenzene                            | 120-82-1   | NE             | NE                 | 24                  | 110                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,2,4-Trimethylbenzene                            | 95-63-6    | 144            | 177                | 300                 | 1800               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,2-Dibromo-3-chloropropane (DBCP)                | 96-12-8    | 0.01           | 0.06               | 0.0053              | 0.064              | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,2-Dibromoethane (EDB)                           | 106-93-4   | 0.02           | 0.14               | 0.036               | 0.16               | 0.0010     | U | 0.0010   | U | 0.00067  | U |
| 1,2-Dichlorobenzene                               | 95-50-1    | NE             | NE                 | 1800                | 9300               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,2-Dichloroethane                                | 107-06-2   | 0.29           | 1.7                | 0.46                | 2                  | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,2-Dichloropropane                               | 78-87-5    | 1.5            | 9.1                | 2.5                 | 11                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,3,5-Trichlorobenzene                            | 108-70-3   | NE             | NE                 | NE                  | NE                 | 0.0020     | U | NA       |   | NA       |   |
| 1,3,5-Trimethylbenzene                            | 108-67-8   | 144            | 177                | 270                 | 1500               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,3-Dichlorobenzene                               | 541-73-1   | NE             | NE                 | NE                  | NE                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,3-Dichloropropane                               | 142-28-9   | NE             | NE                 | 1600                | 23000              | 0.0010     | U | 0.010    | U | 0.0067   | U |
| 1,4-Dichlorobenzene                               | 106-46-7   | NE             | NE                 | 2.6                 | 11                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 1,4-Dioxane                                       | 123-91-1   | 2.8            | 17                 | 5.3                 | 24                 | 0.10       | U | NA       |   | NA       |   |
| 2,2-Dichloropropane                               | 594-20-7   | NE             | NE                 | NE                  | NE                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 2-Butanone (MEK)                                  | 78-93-3    | 16952          | 26991              | 27000               | 190000             | 0.040      | U | NA       |   | NA       |   |
| 2-Chlorotoluene                                   | 95-49-8    | NE             | NE                 | 1600                | 23000              | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 2-Hexanone (MBK)                                  | 591-78-6   | NE             | NE                 | 200                 | 1300               | 0.02       | U | 0.052    | U | 0.034    | U |
| 4-Chlorotoluene                                   | 106-43-4   | NE             | NE                 | 1600                | 23000              | 0.0020     | U | 0.010    | U | 0.0067   | U |
| 4-Methyl-2-pentanone (MIBK)                       | 108-10-1   | NE             | NE                 | 33000               | 140000             | 0.020      | U | 0.052    | U | 0.034    | U |
| Acetone                                           | 67-64-1    | 40609          | 100028             | 61000               | 670000             | 0.10       | U | 0.52     | U | 0.34     | U |
| Acrylonitrile                                     | 107-13-1   | NE             | NE                 | 0.25                | 1.1                | 0.0060     | U | 0.010    | U | 0.0067   | U |
| Benzene                                           | 71-43-2    | 0.7            | 4.2                | 1.2                 | 5.1                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Bromobenzene                                      | 108-86-1   | NE             | NE                 | 290                 | 1800               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Bromochloromethane                                | 74-97-5    | 193            | 597                | 150                 | 630                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Bromodichloromethane                              | 75-27-4    | NE             | NE                 | 0.29                | 1.3                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Bromoform                                         | 75-25-2    | NE             | NE                 | 19                  | 86                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Bromomethane                                      | 74-83-9    | NE             | NE                 | 6.8                 | 30                 | 0.010      | U | 0.010    | U | 0.0067   | U |
| Carbon Disulfide                                  | 75-15-0    | 608            | 662                | 770                 | 3500               | 0.0060     | U | 0.010    | U | 0.0067   | U |
| Carbon Tetrachloride                              | 56-23-5    | 0.37           | 2.2                | 0.65                | 2.9                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Chlorobenzene                                     | 108-90-7   | 414            | 726                | 280                 | 1300               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Chlorodibromomethane                              | 124-48-1   | NE             | NE                 | 8.3                 | 39                 | 0.0010     | U | NA       |   | NA       |   |
| Chloroethane                                      | 75-00-3    | NE             | NE                 | 14000               | 57000              | 0.020      | U | 0.010    | U | 0.0067   | U |
| Chloroform                                        | 67-66-3    | NE             | NE                 | 0.32                | 1.4                | 0.0040     | U | 0.010    | U | 0.0067   | U |
| Chloromethane                                     | 74-87-3    | NE             | NE                 | 110                 | 460                | 0.010      | U | 0.010    | U | 0.0067   | U |
| cis-1,2-Dichloroethylene                          | 156-59-2   | 140            | 1814               | 160                 | 2300               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| cis-1,3-Dichloropropene                           | 10061-01-5 | NE             | NE                 | NE                  | NE                 | 0.0010     | U | 0.010    | U | 0.0067   | U |
| Dibromomethane                                    | 74-95-3    | NE             | NE                 | 24                  | 99                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Dichlorodifluoromethane (Freon 12)                | 75-71-8    | NE             | NE                 | 87                  | 370                | 0.020      | U | 0.010    | U | 0.0067   | U |
| Diethyl Ether                                     | 60-29-7    | NE             | NE                 | 16000               | 230000             | 0.020      | U | NA       |   | NA       |   |
| Diisopropyl Ether (DIPE)                          | 108-20-3   | NE             | NE                 | 2200                | 9400               | 0.0010     | U | NA       |   | NA       |   |

Table B-1  
Volatile Organic Compound Analytical Results – Soil Samples

| Sample ID                         |              | VSS - Resident | VSS - Non-Resident | EPA Residential RSL | EPA Industrial RSL | Trip Blank |   | SL-3     |   | SL-4     |   |
|-----------------------------------|--------------|----------------|--------------------|---------------------|--------------------|------------|---|----------|---|----------|---|
| Sample Date                       | CAS#         | (mg/Kg)        | (mg/Kg)            | (mg/Kg)             | (mg/Kg)            | 7/7/2021   | Q | 3/1/2022 | Q | 3/1/2022 | Q |
| Ethylbenzene                      | 100-41-4     | 3.7            | 22                 | 5.8                 | 25                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Hexachlorobutadiene               | 87-68-3      | NE             | NE                 | 1.2                 | 5.3                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Isopropylbenzene (Cumene)         | 98-82-8      | 256            | 264                | 1900                | 9900               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| m+p Xylene                        | 108383/10642 | NE             | NE                 | NE                  | NE                 | 0.0040     | U | 0.010    | U | 0.0067   | U |
| Methyl Acetate                    | 79-20-9      | NE             | NE                 | 78000               | 1200000            | 0.0040     | U | NA       |   | NA       |   |
| Methyl Cyclohexane                | 108-87-2     | NE             | NE                 | NE                  | NE                 | 0.0020     | U | NA       |   | NA       |   |
| Methyl Ethyl Ketone               | 78-93-3      | 16952          | 26991              | 27000               | 190000             | NA         |   | 0.062    | U | 0.04     | U |
| Methyl tert-Butyl Ether (MTBE)    | 1634-04-4    | 649            | 4464               | 47                  | 210                | 0.0040     | U | 0.021    | U | 0.013    | U |
| Methylene Chloride                | 75-09-2      | NE             | NE                 | 57                  | 1000               | 0.020      | U | 0.021    | U | 0.013    | U |
| Naphthalene                       | 91-20-3      | 2.7            | 16                 | 2                   | 8.6                | 0.0040     | U | 0.010    | U | 0.0067   | U |
| n-Butylbenzene                    | 104-51-8     | 3504           | 51100              | 3900                | 58000              | 0.0020     | U | 0.010    | U | 0.0067   | U |
| n-Propylbenzene                   | 103-65-1     | 253            | 261                | 3800                | 24000              | 0.0020     | U | 0.010    | U | 0.0067   | U |
| o-Xylene                          | 95-47-6      | NE             | NE                 | 650                 | 2800               | 0.0020     | U | 0.010    | U | 0.0067   | U |
| p-Isopropyltoluene (p-Cymene)     | 99-87-6      | NE             | NE                 | NE                  | NE                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| sec-Butylbenzene                  | 135-98-8     | 7009           | 102200             | 7800                | 120000             | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Styrene                           | 100-42-5     | NE             | NE                 | 6000                | 35000              | 0.0020     | U | 0.010    | U | 0.0067   | U |
| tert-Amyl Methyl Ether (TAME)     | 994-05-8     | NE             | NE                 | NE                  | NE                 | 0.0010     | U | NA       |   | NA       |   |
| tert-Butyl Alcohol (TBA)          | 75-65-0      | NE             | NE                 | NE                  | NE                 | 0.10       | U | NA       |   | NA       |   |
| tert-Butyl Ethyl Ether (TBEE)     | 637-92-3     | NE             | NE                 | NE                  | NE                 | 0.0010     | U | NA       |   | NA       |   |
| tert-Butylbenzene                 | 98-06-6      | 7009           | 102200             | 7800                | 120000             | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Tetrachloroethylene               | 127-18-4     | 2.4            | 14                 | 24                  | 100                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Tetrahydrofuran                   | 109-99-9     | NE             | NE                 | 18000               | 94000              | 0.010      | U | 0.021    | U | 0.013    | U |
| Toluene                           | 108-88-3     | 706            | 798                | 4900                | 47000              | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Total Trimethylbenzene            | 25551-13-7   | NE             | NE                 | NE                  | NE                 | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Total Xylene                      | 1330-20-7    | 252            | 257                | 580                 | 2500               | 0.0040     | U | 0.010    | U | 0.0067   | U |
| trans-1,2-Dichloroethylene        | 156-60-5     | 1402           | 18137              | 70                  | 300                | 0.0020     | U | 0.010    | U | 0.0067   | U |
| trans-1,3-Dichloropropene         | 10061-02-6   | NE             | NE                 | NE                  | NE                 | 0.0010     | U | 0.010    | U | 0.0067   | U |
| trans-1,4-Dichloro-2-butene       | 110-57-6     | NE             | NE                 | 0.0074              | 0.032              | 0.0040     | U | 0.021    | U | 0.013    | U |
| Trichloroethylene                 | 79-01-6      | 0.68           | 6.5                | 0.94                | 6                  | 0.0020     | U | 0.010    | U | 0.0067   | U |
| Trichlorofluoromethane (Freon 11) | 75-69-4      | NE             | NE                 | 23000               | 350000             | 0.010      | U | 0.010    | U | 0.0067   | U |
| Trichlorotrifluoroethane          | 76-13-1      | NE             | NE                 | 6700                | 28000              | NA         |   | 0.021    | U | 0.013    | U |
| Vinyl Chloride                    | 75-01-4      | 0.1            | 0.59               | 0.059               | 1.7                | 0.010      | U | 0.010    | U | 0.0067   | U |

Key:

Vermont Soil Standards (VSS) from Investigation and Remediation of Contaminated Properties Rule, July 2019

RSL - US Environmental Protection Agency, Regional Screening Levels for Residential (Res) and Industrial (Ind) settings, November 2020

mg/kg - milligrams per kilogram (parts per million)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedence of the VSS Resident Soil enforcement standard; defaults to EPA Residential if not established

Italicized results indicate an exceedence of the VSS Non-resident enforcement standard; defaults to EPA Industrial if not established

NE - screening level not established

U - Analyte not detected; limit of quantitation listed

RPD - Relative percent difference

NA - Not Analyzed

Table B-3  
Priority Pollutant Metals Analytical Results - Soil Samples

|             |           | VSS - Resident | VSS - Non-Resident | EPA Residential RSL | EPA Industrial RSL |          |   |          |   |          |   |          |   |           |   |          |   |
|-------------|-----------|----------------|--------------------|---------------------|--------------------|----------|---|----------|---|----------|---|----------|---|-----------|---|----------|---|
| Sample ID   |           |                |                    |                     |                    | SB-1-1.0 |   | SB-1-6.0 |   | SB-2-3.0 |   | SB-3-1.5 |   | SB-3-11.0 |   | SB-4-5.0 |   |
| Sample Date | CAS#      |                |                    |                     |                    | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021  | Q | 7/6/2021 | Q |
|             |           | (mg/Kg)        | (mg/Kg)            | (mg/Kg)             | (mg/Kg)            |          |   |          |   |          |   |          |   |           |   |          |   |
| Antimony    | 7440-36-0 | 26             | 319                | 31                  | 470                | 1.9      | U | 2.0      | U | 1.9      | U | 2.0      | U | 2.3       | U | 2.0      | U |
| Arsenic     | 7440-38-2 | 16             | 16                 | 0.68                | 3                  | 5.9      |   | 4.1      | U | 23       |   | 7.1      |   | 4.7       | U | 4.0      | U |
| Beryllium   | 7440-41-7 | 35             | 289                | 160                 | 2300               | 0.47     |   | 0.55     |   | 0.51     |   | 0.80     |   | 0.41      |   | 0.57     |   |
| Cadmium     | 7440-43-9 | 6.9            | 87                 | 71                  | 980                | 0.81     |   | 0.41     | U | 2.8      |   | 1.5      |   | 0.47      | U | 0.40     | U |
| Chromium    | 7440-47-3 | NE             | NE                 | NE                  | NE                 | 21       |   | 19       |   | 33       |   | 16       |   | 19        |   | 18       |   |
| Copper      | 7440-50-8 | 10407          | 139231             | 3100                | 47000              | 64       |   | 16       |   | 180      |   | 46       |   | 8.3       |   | 16       |   |
| Lead        | 7439-92-1 | 400            | 800                | 400                 | 800                | 410      |   | 4.0      |   | 410      |   | 140      |   | 2.7       |   | 6.2      |   |
| Nickel      | 7440-02-0 | 940            | 9707               | 1500                | 22000              | 17       |   | 18       |   | 32       |   | 24       |   | 15        |   | 21       |   |
| Selenium    | 7782-49-2 | 366            | 4900               | 390                 | 5800               | 3.8      | U | 4.1      | U | 38       | U | 4.0      | U | 4.7       | U | 4.0      | U |
| Silver      | 7440-22-4 | 237            | 2483               | 390                 | 5800               | 0.38     | U | 0.41     | U | 0.38     | U | 0.40     | U | 0.47      | U | 0.40     | U |
| Thallium    | 7440-28-0 | NE             | NE                 | 0.78                | 12                 | 1.9      | U | 2.0      | U | 1.9      | U | 2.0      | U | 2.3       | U | 2.0      | U |
| Zinc        | 7440-66-6 | 21986          | 294150             | 23000               | 350000             | 290      |   | 26       |   | 860      |   | 390      |   | 31        |   | 39       |   |
| Mercury     | 7439-97-6 | 3.1            | 3.1                | 11                  | 46                 | 0.15     |   | 0.035    | U | 0.87     |   | 0.41     |   | 0.041     | U | 0.066    |   |

|             |           | VSS - Resident | VSS - Non-Resident | EPA Residential RSL | EPA Industrial RSL |          |   |          |   |          |   |             |   |          |   |          |   |
|-------------|-----------|----------------|--------------------|---------------------|--------------------|----------|---|----------|---|----------|---|-------------|---|----------|---|----------|---|
| Sample ID   |           |                |                    |                     |                    | SB-5-1.5 |   | SB-5-7.5 |   | SB-7-3.0 |   | SB-7-3.0-FD |   | SB-7-6.0 |   | SB-8-1.5 |   |
| Sample Date | CAS#      |                |                    |                     |                    | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021    | Q | 7/6/2021 | Q | 7/6/2021 | Q |
|             |           | (mg/Kg)        | (mg/Kg)            | (mg/Kg)             | (mg/Kg)            |          |   |          |   |          |   |             |   |          |   |          |   |
| Antimony    | 7440-36-0 | 26             | 319                | 31                  | 470                | 1.8      | U | 2.0      | U | 1.8      | U | 1.9         | U | 2.4      | U | 1.9      | U |
| Arsenic     | 7440-38-2 | 16             | 16                 | 0.68                | 3                  | 12       |   | 4.0      | U | 4.4      |   | 4.3         |   | 4.8      | U | 6.0      |   |
| Beryllium   | 7440-41-7 | 35             | 289                | 160                 | 2300               | 0.40     |   | 0.36     |   | 0.38     |   | 0.43        |   | 0.60     |   | 0.66     |   |
| Cadmium     | 7440-43-9 | 6.9            | 87                 | 71                  | 980                | 0.57     |   | 0.4      | U | 0.36     | U | 0.38        | U | 0.48     | U | 0.38     | U |
| Chromium    | 7440-47-3 | NE             | NE                 | NE                  | NE                 | 29       |   | 13       |   | 12       |   | 20          |   | 25       |   | 27       |   |
| Copper      | 7440-50-8 | 10407          | 139231             | 3100                | 47000              | 140      |   | 14       |   | 14       |   | 18          |   | 15       |   | 22       |   |
| Lead        | 7439-92-1 | 400            | 800                | 400                 | 800                | 60       |   | 27       |   | 48       |   | 60          |   | 5.9      |   | 61       |   |
| Nickel      | 7440-02-0 | 940            | 9707               | 1500                | 22000              | 15       |   | 17       |   | 13       |   | 16          |   | 21       |   | 23       |   |
| Selenium    | 7782-49-2 | 366            | 4900               | 390                 | 5800               | 3.6      | U | 4.0      | U | 3.6      | U | 3.8         | U | 4.8      | U | 3.8      | U |
| Silver      | 7440-22-4 | 237            | 2483               | 390                 | 5800               | 0.36     | U | 0.40     | U | 0.36     | U | 0.38        | U | 0.48     | U | 0.38     | U |
| Thallium    | 7440-28-0 | NE             | NE                 | 0.78                | 12                 | 1.8      | U | 2.0      | U | 1.8      | U | 1.9         | U | 2.4      | U | 1.9      | U |
| Zinc        | 7440-66-6 | 21986          | 294150             | 23000               | 350000             | 86       |   | 20       |   | 84       |   | 91          |   | 36       |   | 110      |   |
| Mercury     | 7439-97-6 | 3.1            | 3.1                | 11                  | 46                 | 0.18     |   | 0.034    |   | 0.17     |   | 0.17        |   | 0.043    | U | 0.13     |   |

Table B-3  
Priority Pollutant Metals Analytical Results - Soil Samples

| Sample ID   |           | VSS - Resident | VSS - Non-Resident | EPA Residential RSL | EPA Industrial RSL | SB-8-7.0    |   | SL-1         |   | SL-2       |   |
|-------------|-----------|----------------|--------------------|---------------------|--------------------|-------------|---|--------------|---|------------|---|
| Sample Date | CAS#      | (mg/Kg)        | (mg/Kg)            | (mg/Kg)             | (mg/Kg)            | 7/6/2021    | Q | 7/7/2021     | Q | 7/7/2021   | Q |
| Antimony    | 7440-36-0 | 26             | 319                | 31                  | 470                | 2.4 U       |   | 2.2 U        |   | 2.1 U      |   |
| Arsenic     | 7440-38-2 | 16             | 16                 | 0.68                | 3                  | 4.9 U       |   | 4.4 U        |   | 4.2 U      |   |
| Beryllium   | 7440-41-7 | 35             | 289                | 160                 | 2300               | <b>0.64</b> |   | <b>0.4</b>   |   | 0.21 U     |   |
| Cadmium     | 7440-43-9 | 6.9            | 87                 | 71                  | 980                | 0.49 U      |   | <b>0.84</b>  |   | 0.42 U     |   |
| Chromium    | 7440-47-3 | NE             | NE                 | NE                  | NE                 | <b>27</b>   |   | <b>20</b>    |   | <b>6.6</b> |   |
| Copper      | 7440-50-8 | 10407          | 139231             | 3100                | 47000              | <b>16</b>   |   | <b>30</b>    |   | <b>10</b>  |   |
| Lead        | 7439-92-1 | 400            | 800                | 400                 | 800                | <b>9.1</b>  |   | <b>78</b>    |   | <b>25</b>  |   |
| Nickel      | 7440-02-0 | 940            | 9707               | 1500                | 22000              | <b>23</b>   |   | <b>19</b>    |   | <b>4.8</b> |   |
| Selenium    | 7782-49-2 | 366            | 4900               | 390                 | 5800               | 4.9 U       |   | 4.4 U        |   | 4.2 U      |   |
| Silver      | 7440-22-4 | 237            | 2483               | 390                 | 5800               | 0.49 U      |   | 0.44 U       |   | 0.42 U     |   |
| Thallium    | 7440-28-0 | NE             | NE                 | 0.78                | 12                 | 2.4 U       |   | 2.2 U        |   | 2.1 U      |   |
| Zinc        | 7440-66-6 | 21986          | 294150             | 23000               | 350000             | <b>38</b>   |   | <b>340</b>   |   | <b>150</b> |   |
| Mercury     | 7439-97-6 | 3.1            | 3.1                | 11                  | 46                 | 0.038 U     |   | <b>0.049</b> |   | 0.038 U    |   |

Key:

Vermont Soil Standards from Investigation and Remediation of Contaminated Properties Rule, July 2019

RSL - US Environmental Protection Agency, Regional Screening Levels for Residential (Res) and Industrial (Ind) settings, November 2020

mg/kg - milligrams per kilogram (parts per million)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedance of the residential enforcement standard(s)

Italicized results indicate an exceedance of the non-residential enforcement standard(s)

NE - screening level not established

NA - Analyte not analyzed

U - Analyte not detected; limit of quantitation listed

Table B-4  
Polychlorinated Biphenyl Analytical Results - Soil Samples

| Sample ID    |            | VSS - Resident Soil | VSS - Non-resident Soil | EPA Residential RSL | EPA Industrial RSL | SB-1-1.0 |   | SB-1-1.0-FD |   | SB-2-3.0 |   | SB-3-1.5 |   | SB-5-1.5 |   | SB-5-7.5 |   |
|--------------|------------|---------------------|-------------------------|---------------------|--------------------|----------|---|-------------|---|----------|---|----------|---|----------|---|----------|---|
| Sample Date  |            | (mg/Kg)             | (mg/Kg)                 | (mg/Kg)             | (mg/Kg)            | 7/6/2021 | Q | 7/6/2021    | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q | 7/6/2021 | Q |
| Aroclor-1016 | 12674-11-2 | NE                  | NE                      | 4.1                 | 27                 | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Aroclor-1221 | 11104-28-2 | NE                  | NE                      | 0.2                 | 0.83               | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Aroclor-1232 | 11141-16-5 | NE                  | NE                      | 0.17                | 0.72               | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Aroclor-1242 | 53469-21-9 | NE                  | NE                      | 0.23                | 0.95               | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Aroclor-1248 | 12672-29-6 | NE                  | NE                      | 0.23                | 0.95               | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Aroclor-1254 | 11097-69-1 | NE                  | NE                      | 0.24                | 0.97               | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Aroclor-1260 | 11096-82-5 | NE                  | NE                      | 0.24                | 0.99               | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Aroclor-1262 | 37324-23-5 | NE                  | NE                      | NE                  | NE                 | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Aroclor-1268 | 11100-14-4 | NE                  | NE                      | NE                  | NE                 | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Total PCBs   | 1336-36-3  | 0.114               | 0.68                    | 0.23                | 0.94               | 0.092 U  |   | 0.094 U     |   | 0.096 U  |   | 0.096 U  |   | 0.09 U   |   | 0.096 U  |   |
| Sample ID    |            | VSS - Resident Soil | VSS - Non-resident Soil | EPA Residential RSL | EPA Industrial RSL | SL-1     |   | SL-2        |   |          |   |          |   |          |   |          |   |
| Sample Date  | CAS#       | (mg/Kg)             | (mg/Kg)                 | (mg/Kg)             | (mg/Kg)            | 7/7/2021 | Q | 7/7/2021    | Q |          |   |          |   |          |   |          |   |
| Aroclor-1016 | 12674-11-2 | NE                  | NE                      | 4.1                 | 27                 | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Aroclor-1221 | 11104-28-2 | NE                  | NE                      | 0.2                 | 0.83               | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Aroclor-1232 | 11141-16-5 | NE                  | NE                      | 0.17                | 0.72               | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Aroclor-1242 | 53469-21-9 | NE                  | NE                      | 0.23                | 0.95               | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Aroclor-1248 | 12672-29-6 | NE                  | NE                      | 0.23                | 0.95               | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Aroclor-1254 | 11097-69-1 | NE                  | NE                      | 0.24                | 0.97               | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Aroclor-1260 | 11096-82-5 | NE                  | NE                      | 0.24                | 0.99               | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Aroclor-1262 | 37324-23-5 | NE                  | NE                      | NE                  | NE                 | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Aroclor-1268 | 11100-14-4 | NE                  | NE                      | NE                  | NE                 | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |
| Total PCBs   | 1336-36-3  | 0.114               | 0.68                    | 0.23                | 0.94               | 0.11 U   |   | 0.10 U      |   |          |   |          |   |          |   |          |   |

Key:

Vermont Soil Standards from Investigation and Remediation of Contaminated Properties Rule, July 2019

RSL - US Environmental Protection Agency, Regional Screening Levels for Residential (Res) and Industrial (Ind) settings, November 2020

mg/kg - milligrams per kilogram (parts per million)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedance of the residential enforcement standard(s)

Italicized results indicate an exceedance of the non-residential enforcement standard(s)

NE - screening level not established

U - Analyte not detected; limit of quantitation listed

Table B-5  
Herbicide Analytical Results – Soil Samples

| Sample ID         |           | VSS -<br>Resident Soil | VSS - Non-<br>resident Soil | EPA<br>Residential<br>RSL | EPA<br>Industrial<br>RSL | SB-2-3.0 |   | SL-1     |   |
|-------------------|-----------|------------------------|-----------------------------|---------------------------|--------------------------|----------|---|----------|---|
| Sample Date       | CAS#      | (µg/kg)                | (µg/kg)                     | (µg/kg)                   | (µg/kg)                  | 7/6/2021 | Q | 7/7/2021 | Q |
| 2,4,5-T           | 93-76-5   | 630                    | 8200                        | 8200                      | NE                       | 12 U     |   | 14 U     |   |
| 2,4,5-TP (Silvex) | 93-72-1   | 510                    | 6600                        | 6600                      | NE                       | 12 U     |   | 14 U     |   |
| 2,4-D             | 94-75-7   | 700                    | 9600                        | 9600                      | NE                       | 120 U    |   | 140 U    |   |
| 2,4-DB            | 94-82-6   | 1900                   | 25000                       | 25000                     | NE                       | 120 U    |   | 140 U    |   |
| Dalapon           | 75-99-0   | 1900                   | 25000                       | 25000                     | NE                       | 300 U    |   | 340 U    |   |
| Dicamba           | 1918-00-9 | 1900                   | 25000                       | 25000                     | NE                       | 12 U     |   | 14 U     |   |
| Dichloroprop      | 120-36-5  | NE                     | NE                          | NE                        | NE                       | 120 U    |   | 140 U    |   |
| Dinoseb           | 88-85-7   | 63                     | 820                         | 820                       | NE                       | 60 U     |   | 68 U     |   |
| MCPA              | 94-74-6   | 32                     | 410                         | 410                       | NE                       | 12000 U  |   | 14000 U  |   |
| MCPP              | 93-65-2   | 63                     | 820                         | 820                       | NE                       | 12000 U  |   | 14000 U  |   |

Key:

Vermont Soil Standards from Investigation and Remediation of Contaminated Properties Rule, July 2019

RSL - US Environmental Protection Agency, Regional Screening Levels for Residential (Res) and Industrial (Ind) settings, November 2020

µg/kg - micrograms per kilogram (parts per billion)

Shaded results indicate an exceedance of the residential enforcement standard(s)

Italicized results indicate an exceedance of the non-residential enforcement standard(s)

NE - screening level not established

U - Analyte not detected; limit of quantitation listed

Table B-6  
Total Petroleum Hydrocarbons Analytical Results - Soil Samples

| Sample ID                     |       | VT Soil<br>Screening<br>Value -<br>Resident | VT Soil<br>Screening<br>Value - Non<br>Resident | SB-6-13.0    |   | SL-2         |   | SL-3         |   | SL-4        |   |
|-------------------------------|-------|---------------------------------------------|-------------------------------------------------|--------------|---|--------------|---|--------------|---|-------------|---|
| Sample Date                   |       |                                             |                                                 | 7/6/2021     | Q | 7/7/2021     | Q | 3/1/2022     | Q | 3/1/2022    | Q |
|                               | CAS#  | mg/Kg                                       | mg/Kg                                           |              |   |              |   |              |   |             |   |
| Diesel Range Organics         | C-999 | 96                                          | 440                                             | NA           |   | <b>15000</b> |   | <b>140</b> U |   | <b>59</b> U |   |
| Gasoline Range Organics (GRO) | NA    | 82                                          | 420                                             | <b>11000</b> |   | NA           |   | NA           |   | NA          |   |
|                               |       |                                             |                                                 |              |   |              |   |              |   |             |   |

Key:

Vermont Soil Standards from Investigation and Remediation of Contaminated Properties Rule, July 2019

mg/kg - milligrams per kilogram (parts per million)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedance of the residential enforcement standard(s)

Italicized results indicate an exceedance of the non-residential enforcement standard(s)

NE - screening level not established

Q - laboratory result qualifier

U - Analyte not detected; limit of quantitation listed

NA - Not Analyzed

Table B-7  
Volatile Organic Compound Analytical Results - Groundwater Samples

| Sample ID                             | VGES     | PZ-1     | PZ-2     | PZ-3     | PZ-4     | PZ-5     | PZ-6     | PZ-6-FD  | Trip Blank | FP-090121 | Trip Blank | RPD      |
|---------------------------------------|----------|----------|----------|----------|----------|----------|----------|----------|------------|-----------|------------|----------|
| Sample Date                           | CAS#     | 7/7/2021 | 7/7/2021 | 7/7/2021 | 7/7/2021 | 7/6/2021 | 7/6/2021 | 7/6/2021 | 7/7/2021   | 8/1/2021  | 7/7/2021   |          |
|                                       | (µg/L)   | Q        | Q        | Q        | Q        | Q        | Q        | Q        | Q          | Q         | Q          |          |
| 1,1,1,2-Tetrachloroethane             | 630-20-6 | 70       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,1,1-Trichloroethane                 | 71-55-6  | 200      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,1,2,2-Tetrachloroethane             | 79-34-5  | NE       | 0.5 U    | 0.5 U    | 1 U      | 0.5 U    | 0.5 U    | 20 U     | 50 U       | 0.50 U    | 5 U        | 0.5 U -  |
| 1,1,2-Trichloro-1,2,2-trifluoroethane | 76-13-1  | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,1,2-Trichloroethane                 | 79-00-5  | 5        | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,1-Dichloroethane                    | 75-34-3  | 70       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,1-Dichloroethylene                  | 75-35-4  | 7        | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,1-Dichloropropene                   | 563-58-6 | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2.0 U -  |
| 1,2,3-Trichlorobenzene                | 87-61-6  | 0.9      | 5.0 U    | 5.0 U    | 10.0 U   | 5.0 U    | 5.0 U    | 200 U    | 500 U      | 5.0 U     | 50 U       | 5.0 U -  |
| 1,2,3-Trichloropropane                | 96-18-4  | 0.02     | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2.0 U -  |
| 1,2,4-Trichlorobenzene                | 120-82-1 | 70       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,2,4-Trimethylbenzene                | 95-63-6  | 23       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 3400     | 3300       | 1.0 U     | 10 U       | 1.0 U 3% |
| 1,2-Dibromo-3-chloropropane (DBCP)    | 96-12-8  | 0.2      | 5.0 U    | 5.0 U    | 10 U     | 5.0 U    | 5.0 U    | 200 U    | 500 U      | 5.0 U     | 50 U       | 5.0 U -  |
| 1,2-Dibromoethane (EDB)               | 106-93-4 | 0.05     | 0.50 U   | 0.50 U   | 1 U      | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.50 U    | 5 U        | 0.5 U -  |
| 1,2-Dichlorobenzene                   | 95-50-1  | 600      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,2-Dichloroethane                    | 107-06-2 | 5        | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,2-Dichloropropane                   | 78-87-5  | 5        | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,3,5-Trichlorobenzene                | 108-70-3 | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,3,5-Trimethylbenzene                | 108-67-8 | 23       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 1000     | 950        | 1.0 U     | 10 U       | 1.0 U 5% |
| 1,3-Dichlorobenzene                   | 541-73-1 | 600      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,3-Dichloropropane                   | 142-28-9 | NE       | 0.50 U   | 0.50 U   | 1.00 U   | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.50 U    | 5 U        | 0.5 U -  |
| 1,4-Dichlorobenzene                   | 106-46-7 | 75       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 1,4-Dioxane                           | 123-91-1 | 0.3      | 50 U     | 50 U     | 100 U    | 50 U     | 50 U     | 2000 U   | 5000 U     | 50 U      | 500 U      | 50 U -   |
| 2,2-Dichloropropane                   | 594-20-7 | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 2-Butanone (MEK)                      | 78-93-3  | 511      | 20 U     | 20 U     | 40 U     | 20 U     | 20 U     | 800 U    | 2000 U     | 20 U      | 200 U      | 20 U -   |
| 2-Chlorotoluene                       | 95-49-8  | 100      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 2-Hexanone (MBK)                      | 591-78-6 | NE       | 10 U     | 10 U     | 20 U     | 10 U     | 10 U     | 400 U    | 1000 U     | 10 U      | 100 U      | 10 U -   |
| 4-Chlorotoluene                       | 106-43-4 | 100      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| 4-Methyl-2-pentanone (MIBK)           | 108-10-1 | NE       | 10 U     | 10 U     | 20 U     | 10 U     | 10 U     | 400 U    | 1000 U     | 10 U      | 100 U      | 10 U -   |
| Acetone                               | 67-64-1  | 950      | 50 U     | 50 U     | 100 U    | 50 U     | 50 U     | 2000 U   | 5000 U     | 50 U      | 500 U      | 50 U -   |
| Acrylonitrile                         | 107-13-1 | NE       | 5.0 U    | 5.0 U    | 10.0 U   | 5.0 U    | 5.0 U    | 200 U    | 500 U      | 5.0 U     | 50 U       | 5.0 U -  |
| Benzene                               | 71-43-2  | 5        | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| Bromobenzene                          | 108-86-1 | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| Bromochloromethane                    | 74-97-5  | 8        | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| Bromodichloromethane                  | 75-27-4  | NE       | 0.50 U   | 0.50 U   | 1.0 U    | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.5 U     | 5 U        | 6.0 U -  |
| Bromoform                             | 75-25-2  | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| Bromomethane                          | 74-83-9  | 5        | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2.0 U -  |
| Carbon Disulfide                      | 75-15-0  | NE       | 5.0 U    | 5.0 U    | 10 U     | 5.0 U    | 5.0 U    | 200 U    | 500 U      | 5.0 U     | 50 U       | 5.0 U -  |
| Carbon Tetrachloride                  | 56-23-5  | 5        | 5.0 U    | 5.0 U    | 10 U     | 5.0 U    | 5.0 U    | 200 U    | 500 U      | 5.0 U     | 50 U       | 5.0 U -  |
| Chlorobenzene                         | 108-90-7 | 100      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U -  |
| Chlorodibromomethane                  | 124-48-1 | NE       | 0.50 U   | 0.50 U   | 1.0 U    | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.50 U    | 5 U        | 1.3 U -  |
| Chloroethane                          | 75-00-3  | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2 U -    |
| Chloroform                            | 67-66-3  | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 21 U -   |
| Chloromethane                         | 74-87-3  | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2 U -    |
| cis-1,2-Dichloroethylene              | 156-59-2 | 70       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1 U -    |

Table B-7  
Volatile Organic Compound Analytical Results - Groundwater Samples

| Sample ID                          | VGES          | PZ-1     | PZ-2     | PZ-3     | PZ-4     | PZ-5     | PZ-6     | PZ-6-FD  | Trip Blank | FP-090121 | Trip Blank |       |
|------------------------------------|---------------|----------|----------|----------|----------|----------|----------|----------|------------|-----------|------------|-------|
| Sample Date                        |               | 7/7/2021 | 7/7/2021 | 7/7/2021 | 7/7/2021 | 7/6/2021 | 7/6/2021 | 7/6/2021 | 7/7/2021   | 8/1/2021  | 7/7/2021   | RPD   |
| CAS#                               | (µg/L)        | Q        | Q        | Q        | Q        | Q        | Q        | Q        | Q          | Q         | Q          |       |
| cis-1,3-Dichloropropene            | 10061-01-5    | NE       | 0.50 U   | 0.50 U   | 1.0 U    | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.50 U    | 5 U        | 0.5 U |
| Dibromomethane                     | 74-95-3       | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| Dichlorodifluoromethane (Freon 12) | 75-71-8       | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2.0 U |
| Diethyl Ether                      | 60-29-7       | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2.0 U |
| Diisopropyl Ether (DIPE)           | 108-20-3      | NE       | 0.50 U   | 0.50 U   | 1.0 U    | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.5 U     | 5 U        | 0.5 U |
| Ethylbenzene                       | 100-41-4      | 700      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 2100     | 2600       | 1.0 U     | 10 U       | 1.0 U |
| Hexachlorobutadiene                | 87-68-3       | NE       | 0.60 U   | 0.60 U   | 1.2 U    | 0.60 U   | 0.60 U   | 24 U     | 60 U       | 0.60 U    | 6 U        | 0.6 U |
| Isopropylbenzene (Cumene)          | 98-82-8       | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 260      | 260        | 1.0 U     | 10 U       | 1.0 U |
| m+p Xylene                         | 108383/106423 | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 9300     | 11000      | 2.0 U     | 20 U       | 2.0 U |
| Methyl Acetate                     | 79-20-9       | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| Methyl Cyclohexane                 | 108-87-2      | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 240      | 130        | 1.0 U     | 10 U       | 1.0 U |
| Methyl tert-Butyl Ether (MTBE)     | 1634-04-4     | 11       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| Methylene Chloride                 | 75-09-2       | 5        | 5.0 U    | 5.0 U    | 10 U     | 5.0 U    | 5.0 U    | 200 U    | 500 U      | 5.0 U     | 50 U       | 5.0 U |
| Naphthalene                        | 91-20-3       | 0.5      | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 450      | 350        | 2.0 U     | 20 U       | 2.0 U |
| n-Butylbenzene                     | 104-51-8      | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 180      | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| n-Propylbenzene                    | 103-65-1      | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 550      | 500        | 1.0 U     | 10 U       | 1.0 U |
| o-Xylene                           | 95-47-6       | 10000    | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 1600     | 1900       | 1.0 U     | 10 U       | 1.0 U |
| p-Isopropyltoluene (p-Cymene)      | 99-87-6       | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| sec-Butylbenzene                   | 135-98-8      | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 52       | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| Styrene                            | 100-42-5      | 100      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| tert-Amyl Methyl Ether (TAME)      | 994-05-8      | NE       | 0.50 U   | 0.50 U   | 1.0 U    | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.50 U    | 5 U        | 0.5 U |
| tert-Butyl Alcohol (TBA)           | 75-65-0       | NE       | 20 U     | 20 U     | 40 U     | 20 U     | 20 U     | 800 U    | 2000 U     | 20 U      | 200 U      | 20 U  |
| tert-Butyl Ethyl Ether (TBEE)      | 637-92-3      | NE       | 0.50 U   | 0.50 U   | 1.0 U    | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.50 U    | 5 U        | 0.5 U |
| tert-Butylbenzene                  | 98-06-6       | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| Tetrachloroethylene                | 127-18-4      | 5        | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| Tetrahydrofuran                    | 109-99-9      | NE       | 10 U     | 10 U     | 20 U     | 10 U     | 10 U     | 400 U    | 1000 U     | 10 U      | 100 U      | 10 U  |
| Toluene                            | 108-88-3      | 1000     | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 1300     | 1700       | 1.0 U     | 10 U       | 1.0 U |
| Total Trimethylbenzene             | 25551-13-7    | NE       | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 4400     | 4250       | 1.0 U     | 10 U       | 1.0 U |
| Total Xylene                       | 1330-20-7     | 10000    | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 10900    | 12900      | 2.0 U     | 10 U       | 1.0 U |
| trans-1,2-Dichloroethylene         | 156-60-5      | 100      | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| trans-1,3-Dichloropropene          | 10061-02-6    | NE       | 0.50 U   | 0.50 U   | 1.0 U    | 0.50 U   | 0.50 U   | 20 U     | 50 U       | 0.50 U    | 5 U        | 0.5 U |
| trans-1,4-Dichloro-2-butene        | 110-57-6      | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2.0 U |
| Trichloroethylene                  | 79-01-6       | 5        | 1.0 U    | 1.0 U    | 2.0 U    | 1.0 U    | 1.0 U    | 40 U     | 100 U      | 1.0 U     | 10 U       | 1.0 U |
| Trichlorofluoromethane (Freon 11)  | 75-69-4       | NE       | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2.0 U |
| Vinyl Chloride                     | 75-01-4       | 2        | 2.0 U    | 2.0 U    | 4.0 U    | 2.0 U    | 2.0 U    | 80 U     | 200 U      | 2.0 U     | 20 U       | 2.0 U |

Table B-7  
Volatile Organic Compound Analytical Results - Groundwater Samples

| Sample ID                   | VGES        | MW-1      | MW-2      | MW-3      | MW-4      | PZ-6      | PZ-6-FD   | TRIP BLANK | RPD       |
|-----------------------------|-------------|-----------|-----------|-----------|-----------|-----------|-----------|------------|-----------|
| Sample Date                 |             | 2/23/2022 | 2/23/2022 | 2/23/2022 | 2/23/2022 | 2/23/2022 | 2/23/2022 | 2/23/2022  |           |
| CAS#                        | (µg/l)      | Q         | Q         | Q         | Q         | Q         | Q         | Q          |           |
| 1,1,1,2-Tetrachloroethane   | 630-20-6    | 70        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,1,1-Trichloroethane       | 71-55-6     | 200       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,1,2,2-Tetrachloroethane   | 79-34-5     | NE        | 0.50 U    | 0.50 U    | 0.50 U    | 0.50 U    | 10 U      | 10 U       | 0.50 U -  |
| 1,1,2-Trichloroethane       | 79-00-5     | 5         | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,1-Dichloroethane          | 75-34-3     | 70        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,1-Dichloroethene          | 75-35-4     | 7         | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,1-Dichloropropene         | 563-58-6    | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,2,3-Trichlorobenzene      | 87-61-6     | 0.9       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,2,3-Trichloropropane      | 96-18-4     | 0.02      | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,2,4-Trichlorobenzene      | 120-82-1    | 70        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,2,4-Trimethylbenzene      | 95-63-6     | 23        | 1.0 U     | 70        | 1.0 U     | 1.0 U     | 790       | 690        | 1.0 U -   |
| 1,2-Dibromo-3-chloropropane | 96-12-8     | 0.2       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,2-Dibromoethane           | 106-93-4    | 0.05      | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,2-Dichlorobenzene         | 95-50-1     | 600       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,2-Dichloroethane          | 107-06-2    | 5         | 0.60 U    | 0.60 U    | 0.60 U    | 0.60 U    | 12 U      | 12 U       | 0.60 U -  |
| 1,2-Dichloropropane         | 78-87-5     | 5         | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,3,5-Trimethylbenzene      | 108-67-8    | 23        | 1.0 U     | 13        | 1.0 U     | 1.0 U     | 190       | 200        | 1.0 U 5%  |
| 1,3-Dichlorobenzene         | 541-73-1    | 600       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,3-Dichloropropane         | 142-28-9    | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 1,4-Dichlorobenzene         | 106-46-7    | 75        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 2,2-Dichloropropane         | 594-20-7    | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 2-Chlorotoluene             | 95-49-8     | 100       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 2-Hexanone                  | 591-78-6    | NE        | 5.0 U     | 5.0 U     | 5.0 U     | 5.0 U     | 100 U     | 100 U      | 5.0 U -   |
| 2-Isopropyltoluene          | 527-84-4    | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 4-Chlorotoluene             | 106-43-4    | 100       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| 4-Methyl-2-pentanone        | 108-10-1    | NE        | 5.0 U     | 5.0 U     | 5.0 U     | 5.0 U     | 100 U     | 100 U      | 5.0 U -   |
| Acetone                     | 67-64-1     | 950       | 25 U      | 25 U      | 25 U      | 25 U      | 500 U     | 500 U      | 25 U -    |
| Acrylonitrile               | 107-13-1    | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Benzene                     | 71-43-2     | 5         | 0.70 U    | 2.7       | 0.70 U    | 0.70 U    | 18        | 17         | 0.70 U 6% |
| Bromobenzene                | 108-86-1    | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Bromochloromethane          | 74-97-5     | 8         | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Bromodichloromethane        | 75-27-4     | NE        | 0.50 U    | 0.50 U    | 0.50 U    | 0.50 U    | 10 U      | 10 U       | 0.50 U -  |
| Bromoform                   | 75-25-2     | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Bromomethane                | 74-83-9     | 5         | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Carbon Disulfide            | 75-15-0     | NE        | 5.0 U     | 5.0 U     | 5.0 U     | 5.0 U     | 100 U     | 100 U      | 5.0 U -   |
| Carbon tetrachloride        | 56-23-5     | 5         | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Chlorobenzene               | 108-90-7    | 100       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Chloroethane                | 75-00-3     | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Chloroform                  | 67-66-3     | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Chloromethane               | 74-87-3     | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| cis-1,2-Dichloroethene      | 156-59-2    | 70        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| cis-1,3-Dichloropropene     | 10061-01-5  | NE        | 0.40 U    | 0.40 U    | 0.40 U    | 0.40 U    | 8.0 U     | 8.0 U      | 0.40 U -  |
| Dibromochloromethane        | 124-48-1    | NE        | 0.50 U    | 0.50 U    | 0.50 U    | 0.50 U    | 10 U      | 10 U       | 0.50 U -  |
| Dibromomethane              | 74-95-3     | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Dichlorodifluoromethane     | 75-71-8     | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Ethylbenzene                | 100-41-4    | 700       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 360       | 350        | 1.0 U 3%  |
| Hexachlorobutadiene         | 87-68-3     | NE        | 0.40 U    | 0.40 U    | 0.40 U    | 0.40 U    | 8.0 U     | 8.0 U      | 0.40 U -  |
| Isopropylbenzene            | 98-82-8     | NE        | 1.0 U     | 6.9       | 1.0 U     | 1.0 U     | 59        | 59         | 1.0 U 0%  |
| m&p-Xylene                  | 179601-23-1 | NE        | 1.0 U     | 240       | 1.0 U     | 1.0 U     | 2600      | 2400       | 1.0 U 8%  |
| Methyl ethyl ketone         | 78-93-3     | 511       | 5.0 U     | 5.0 U     | 5.0 U     | 5.0 U     | 100 U     | 100 U      | 5.0 U -   |
| Methyl t-butyl ether (MTBE) | 1634-04-4   | 11        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Methylene chloride          | 75-09-2     | 5         | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Naphthalene                 | 91-20-3     | 0.5       | 1.0 U     | 7.9       | 1.0 U     | 1.0 U     | 97        | 110        | 1.0 U 13% |
| n-Butylbenzene              | 104-51-8    | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| n-Propylbenzene             | 103-65-1    | NE        | 1.0 U     | 5.6       | 1.0 U     | 1.0 U     | 100       | 100        | 1.0 U 0%  |
| o-Xylene                    | 95-47-6     | 10000     | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 150       | 150        | 1.0 U 0%  |
| p-Isopropyltoluene          | 99-87-6     | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| sec-Butylbenzene            | 135-98-8    | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Styrene                     | 100-42-5    | 100       | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| tert-Butylbenzene           | 98-06-6     | NE        | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |
| Tetrachloroethene           | 127-18-4    | 5         | 1.0 U     | 1.0 U     | 1.0 U     | 1.0 U     | 20 U      | 20 U       | 1.0 U -   |

Table B-7  
Volatile Organic Compound Analytical Results - Groundwater Samples

| Sample ID                   | VGES       | MW-1      | MW-2      | MW-3       | MW-4      | PZ-6      | PZ-6-FD     | TRIP BLANK  |           |
|-----------------------------|------------|-----------|-----------|------------|-----------|-----------|-------------|-------------|-----------|
| Sample Date                 |            | 2/23/2022 | 2/23/2022 | 2/23/2022  | 2/23/2022 | 2/23/2022 | 2/23/2022   | 2/23/2022   |           |
| CAS#                        | (µg/l)     | Q         | Q         | Q          | Q         | Q         | Q           | Q           | RPD       |
| Tetrahydrofuran (THF)       | 109-99-9   | NE        | 2.5 U     | 2.5 U      | 2.5 U     | 2.5 U     | 50 U        | 50 U        | 2.5 U -   |
| Toluene                     | 108-88-3   | 1000      | 1.0 U     | 1.0 U      | 1.0 U     | 1.0 U     | <b>190</b>  | <b>190</b>  | 1.0 U 0%  |
| Total Trimethylbenzene      | 25551-13-7 | NE        | 1.0 U     | <b>83</b>  | 1.0 U     | 1.0 U     | <b>980</b>  | <b>890</b>  | 1.0 U 10% |
| Total Xylenes               | 1330-20-7  | 10000     | 1.0 U     | <b>240</b> | 1.0 U     | 1.0 U     | <b>2750</b> | <b>2550</b> | 1.0 U 8%  |
| trans-1,2-Dichloroethene    | 156-60-5   | 100       | 1.0 U     | 1.0 U      | 1.0 U     | 1.0 U     | 20 U        | 20 U        | 1.0 U -   |
| trans-1,3-Dichloropropene   | 10061-02-6 | NE        | 0.40 U    | 0.40 U     | 0.40 U    | 0.40 U    | 8.0 U       | 8.0 U       | 0.40 U -  |
| trans-1,4-dichloro-2-butene | 110-57-6   | NE        | 5.0 U     | 5.0 U      | 5.0 U     | 5.0 U     | 100 U       | 100 U       | 5.0 U -   |
| Trichloroethene             | 79-01-6    | 5         | 1.0 U     | 1.0 U      | 1.0 U     | 1.0 U     | 20 U        | 20 U        | 1.0 U -   |
| Trichlorofluoromethane      | 75-69-4    | NE        | 1.0 U     | 1.0 U      | 1.0 U     | 1.0 U     | 20 U        | 20 U        | 1.0 U -   |
| Trichlorotrifluoroethane    | 76-13-1    | NE        | 1.0 U     | 1.0 U      | 1.0 U     | 1.0 U     | 20 U        | 20 U        | 1.0 U -   |
| Vinyl chloride              | 75-01-4    | 2         | 1.0 U     | 1.0 U      | 1.0 U     | 1.0 U     | 20 U        | 20 U        | 1.0 U -   |

Key:  
 VGES - Vermont Groundwater Enforcement Standard, July 2019  
 µg/L - micrograms per liter (parts per billion)  
**Bold** results indicate detections of the analyte  
 Shaded results indicate an exceedance of the enforcement standard  
 NE - screening level not established  
 U - Analyte not detected; limit of quantitation listed

Table B-8  
Semi-Volatile Organic Compound Analytical Results - Groundwater Samples

| Sample ID                    |          | VGES   | PZ-1         |   | PZ-2          |   | PZ-4          |   | PZ-5         |   | PZ-6        |   | PZ-6-FD     |   |     |
|------------------------------|----------|--------|--------------|---|---------------|---|---------------|---|--------------|---|-------------|---|-------------|---|-----|
| Sample Date                  |          |        | 7/7/2021     | Q | 7/7/2021      | Q | 7/7/2021      | Q | 7/6/2021     | Q | 7/6/2021    | Q | 7/6/2021    | Q | RPD |
|                              | CAS#     | (µg/L) |              |   |               |   |               |   |              |   |             |   |             |   |     |
| 2-Methylnaphthalene (SIM)    | 91-57-6  | NE     | 1.0 U        |   | 0.99 U        |   | 0.99 U        |   | 1.0 U        |   | <b>88</b>   |   | <b>61</b>   |   | 36% |
| Acenaphthene (SIM)           | 83-32-9  | NE     | 0.30 U       |   | 0.30 U        |   | 0.30 U        |   | 0.30 U       |   | <b>0.62</b> |   | <b>0.41</b> |   | 41% |
| Acenaphthylene (SIM)         | 208-96-8 | NE     | 0.20 U       |   | 0.20 U        |   | 0.20 U        |   | 0.20 U       |   | 0.20 U      |   | 0.20 U      |   | -   |
| Anthracene (SIM)             | 120-12-7 | 343    | 0.20 U       |   | 0.20 U        |   | 0.20 U        |   | 0.20 U       |   | <b>0.70</b> |   | <b>0.41</b> |   | 52% |
| Benzo(a)anthracene (SIM)     | 56-55-3  | NE     | 0.050 U      |   | 0.050 U       |   | 0.050 U       |   | 0.051 U      |   | <b>0.72</b> |   | <b>0.46</b> |   | 44% |
| Benzo(a)pyrene (SIM)         | 50-32-8  | 0.2    | 0.10 U       |   | 0.099 U       |   | 0.099 U       |   | 0.10 U       |   | <b>0.55</b> |   | <b>0.34</b> |   | 47% |
| Benzo(b)fluoranthene (SIM)   | 205-99-2 | NE     | 0.050 U      |   | 0.050 U       |   | 0.050 U       |   | 0.051 U      |   | <b>0.65</b> |   | <b>0.40</b> |   | 48% |
| Benzo(g,h,i)perylene (SIM)   | 191-24-2 | NE     | 0.50 U       |   | 0.50 U        |   | 0.50 U        |   | 0.51 U       |   | 0.50 U      |   | 0.51 U      |   | -   |
| Benzo(k)fluoranthene (SIM)   | 207-08-9 | NE     | 0.20 U       |   | 0.20 U        |   | 0.20 U        |   | 0.20 U       |   | <b>0.25</b> |   | 0.20 U      |   | -   |
| Chrysene (SIM)               | 218-01-9 | NE     | 0.20 U       |   | 0.20 U        |   | 0.20 U        |   | 0.20 U       |   | <b>0.63</b> |   | <b>0.41</b> |   | 42% |
| Dibenz(a,h)anthracene (SIM)  | 53-70-3  | NE     | 0.10 U       |   | 0.099 U       |   | 0.099 U       |   | 0.10 U       |   | 0.099 U     |   | 0.10 U      |   | -   |
| Fluoranthene (SIM)           | 206-44-0 | 46     | 0.50 U       |   | 0.50 U        |   | 0.50 U        |   | 0.51 U       |   | <b>2.0</b>  |   | <b>1.3</b>  |   | 42% |
| Fluorene (SIM)               | 86-73-7  | 46     | 1.0 U        |   | 0.99 U        |   | 0.99 U        |   | 1.0 U        |   | <b>1.5</b>  |   | 1.0 U       |   | -   |
| Indeno(1,2,3-cd)pyrene (SIM) | 193-39-5 | NE     | 0.10 U       |   | 0.099 U       |   | 0.099 U       |   | 0.10 U       |   | <b>0.28</b> |   | <b>0.18</b> |   | 43% |
| Naphthalene (SIM)            | 91-20-3  | 0.5    | <b>1.0 U</b> |   | <b>0.99 U</b> |   | <b>0.99 U</b> |   | <b>1.0 U</b> |   | <b>170</b>  |   | <b>120</b>  |   | 34% |
| Phenanthrene (SIM)           | 85-01-8  | NE     | 0.050 U      |   | 0.050 U       |   | 0.050 U       |   | 0.051 U      |   | <b>2.8</b>  |   | <b>1.8</b>  |   | 43% |
| Pyrene (SIM)                 | 129-00-0 | NE     | 1.0 U        |   | 0.99 U        |   | 0.99 U        |   | 1.0 U        |   | <b>1.6</b>  |   | <b>1.1</b>  |   | 37% |

| Sample ID              |          | VGES   | MW-1          |   | MW-2          |   | MW-3      |   | MW-4      |   | PZ-6       |   | PZ-6-FD    |   |     |
|------------------------|----------|--------|---------------|---|---------------|---|-----------|---|-----------|---|------------|---|------------|---|-----|
| Sample Date            | CAS#     |        | 2/23/2022     | Q | 2/23/2022     | Q | 2/23/2022 | Q | 2/23/2022 | Q | 2/23/2022  | Q | 2/23/2022  | Q | RPD |
|                        |          | (µg/l) |               |   |               |   |           |   |           |   |            |   |            |   |     |
| 2-Methylnaphthalene    | 91-57-6  | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | <b>33</b>  |   | <b>28</b>  |   | 16% |
| Acenaphthene           | 83-32-9  | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Acenaphthylene         | 208-96-8 | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Anthracene             | 120-12-7 | 343    | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Benz(a)anthracene      | 56-55-3  | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Benzo(a)pyrene         | 50-32-8  | 0.2    | <b>0.20 U</b> |   | <b>0.20 U</b> |   | 0.19 U    |   | 0.19 U    |   | 0.19 U     |   | 0.19 U     |   | -   |
| Benzo(b)fluoranthene   | 205-99-2 | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Benzo(ghi)perylene     | 191-24-2 | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Benzo(k)fluoranthene   | 207-08-9 | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Chrysene               | 218-01-9 | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Dibenz(a,h)anthracene  | 53-70-3  | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Fluoranthene           | 206-44-0 | 46     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Fluorene               | 86-73-7  | 46     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Indeno(1,2,3-cd)pyrene | 193-39-5 | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Naphthalene            | 91-20-3  | 0.5    | <b>0.50 U</b> |   | <b>8.0</b>    |   | 0.49 U    |   | 0.49 U    |   | <b>120</b> |   | <b>100</b> |   | 18% |
| Phenanthrene           | 85-01-8  | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |
| Pyrene                 | 129-00-0 | NE     | 0.50 U        |   | 0.50 U        |   | 0.49 U    |   | 0.49 U    |   | 0.47 U     |   | 0.49 U     |   | -   |

Key:  
VGES - Vermont Groundwater Enforcement Standard, July 2019  
µg/L - micrograms per liter (parts per billion)  
**Bold** results indicate detections of the analyte  
Shaded results indicate an exceedance of the enforcement standard  
NE - screening level not established  
U - Analyte not detected; limit of quantitation listed  
RPD - Relative percent difference

Table B-9  
Priority Pollutant Metals Analytical Results - Groundwater Samples

| Sample ID   | VGES      | PZ-1     |             | PZ-2       |            | PZ-3        |            | PZ-4       |            | PZ-5       |            |
|-------------|-----------|----------|-------------|------------|------------|-------------|------------|------------|------------|------------|------------|
| Sample Date |           | 7/7/2021 | Q           | 7/7/2021   | Q          | 7/7/2021    | Q          | 7/7/2021   | Q          | 7/6/2021   | Q          |
| CAS#        | (µg/L)    |          |             |            |            |             |            |            |            |            |            |
| Antimony    | 7440-36-0 | NE       | 1.0 U       | 1.0 U      | 1.0 U      | 1.0 U       | 1.0 U      | 1.0 U      | 1.0 U      | 1.0 U      | 1.0 U      |
| Arsenic     | 7440-38-2 | 10       | <b>0.86</b> | <b>1.7</b> | <b>1.0</b> | <b>0.81</b> | 0.8 U      | 0.8 U      | 0.8 U      | 0.8 U      | 0.8 U      |
| Beryllium   | 7440-41-7 | 4        | 0.40 U      | 0.40 U     | 0.40 U     | 0.40 U      | 0.40 U     | 0.40 U     | 0.40 U     | 0.40 U     | 0.40 U     |
| Cadmium     | 7440-43-9 | 5        | 0.20 U      | 0.20 U     | 0.20 U     | 0.20 U      | 0.20 U     | 0.20 U     | 0.20 U     | 0.20 U     | 0.20 U     |
| Chromium    | 7440-47-3 | 100      | 1.0 U       | 1.0 U      | 1.0 U      | 1.0 U       | 1.0 U      | 1.0 U      | 1.0 U      | 1.0 U      | 1.0 U      |
| Copper      | 7440-50-8 | 1300     | <b>2.1</b>  | <b>9.6</b> | <b>12</b>  | <b>3.3</b>  | <b>1.2</b> | <b>1.2</b> | <b>1.2</b> | <b>1.2</b> | <b>1.2</b> |
| Lead        | 7439-92-1 | 15       | 0.50 U      | 0.50 U     | <b>1.5</b> | 0.50 U      | 0.50 U     | 0.50 U     | 0.50 U     | 0.50 U     | 0.50 U     |
| Nickel      | 7440-02-0 | 100      | <b>6.8</b>  | <b>6.4</b> | 5.0 U      | 5.0 U       | 5.0 U      | 5.0 U      | 5.0 U      | 5.0 U      | 5.0 U      |
| Selenium    | 7782-49-2 | 50       | 5.0 U       | 5.0 U      | 5.0 U      | 5.0 U       | 5.0 U      | 5.0 U      | 5.0 U      | 5.0 U      | 5.0 U      |
| Silver      | 7440-22-4 | NE       | 0.20 U      | 0.20 U     | 0.20 U     | 0.20 U      | 0.20 U     | 0.20 U     | 0.20 U     | 0.20 U     | 0.20 U     |
| Thallium    | 7440-28-0 | 2        | 0.20 U      | 0.20 U     | 0.20 U     | 0.20 U      | 0.20 U     | 0.20 U     | 0.20 U     | 0.20 U     | 0.20 U     |
| Zinc        | 7440-66-6 | NE       | <b>11</b>   | <b>18</b>  | 10 U       | 10 U        | 10 U       | 10 U       | 10 U       | 10 U       | 10 U       |
| Mercury     | 7439-97-6 | 2        | 0.0001 U    | 0.0001 U   | 0.0001 U   | 0.0001 U    | 0.0001 U   | 0.0001 U   | 0.0001 U   | 0.0001 U   | 0.0001 U   |

Key:  
 VGES - Vermont Groundwater Enforcement Standard, July 2019  
 µg/L - micrograms per liter (parts per billion)  
**Bold** results indicate detections of the analyte  
 Shaded results indicate an exceedance of the enforcement standard  
 NE - screening level not established  
 U - Analyte not detected; limit of quantitation listed

Table B-10  
Soil Gas Sample Analytical Results

| Sample ID                                          |              | VIS - Resident | VIS - Non-Resident | SV-1     |   | SV-2     |   | SV-3     |   | SV-4     |   | SV-4 -FD |   | RPD |
|----------------------------------------------------|--------------|----------------|--------------------|----------|---|----------|---|----------|---|----------|---|----------|---|-----|
| Sample Date                                        | CAS#         | (µg/m³)        | (µg/m³)            | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q |     |
| 1,1,1-Trichloroethane                              | 71-55-6      | NE             | NE                 | 5000     |   | 260      |   | 390      |   | 5.6      |   | 5.5      |   | 2%  |
| 1,1,2,2-Tetrachloroethane                          | 79-34-5      | NE             | NE                 | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | -   |
| 1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)  | 76-13-1      | NE             | NE                 | 6.1 U    |   | 6.1 U    |   | 6.1 U    |   | 6.1 U    |   | 6.1 U    |   | -   |
| 1,1,2-Trichloroethane                              | 79-00-5      | NE             | NE                 | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | -   |
| 1,1-Dichloroethane                                 | 75-34-3      | 21             | 170                | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | -   |
| 1,1-Dichloroethylene                               | 75-35-4      | 6700           | 23000              | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | -   |
| 1,2,4-Trichlorobenzene                             | 120-82-1     | NE             | NE                 | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | -   |
| 1,2,4-Trimethylbenzene                             | 95-63-6      | 2000           | 7000               | 0.98 U   |   | 76       |   | 2.4      |   | 1.8      |   | 2.0      |   | 11% |
| 1,2-Dibromoethane (EDB)                            | 106-93-4     | NE             | NE                 | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | -   |
| 1,2-Dichloro-1,1,2,2-tetrafluoroethane (Freon 114) | 76-14-2      | NE             | NE                 | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | -   |
| 1,2-Dichlorobenzene                                | 95-50-1      | NE             | NE                 | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | -   |
| 1,2-Dichloroethane                                 | 107-06-2     | NE             | NE                 | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | -   |
| 1,2-Dichloropropane                                | 78-87-5      | NE             | NE                 | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | -   |
| 1,3,5-Trimethylbenzene                             | 108-67-8     | 2000           | 7000               | 0.98 U   |   | 28       |   | 1.8      |   | 0.98 U   |   | 0.98 U   |   | -   |
| 1,3-Butadiene                                      | 106-99-0     | NE             | NE                 | 4.3      |   | 0.44 U   |   | 0.44 U   |   | 0.44 U   |   | 0.44 U   |   | -   |
| 1,3-Dichlorobenzene                                | 541-73-1     | NE             | NE                 | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | -   |
| 1,4-Dichlorobenzene                                | 106-46-7     | NE             | NE                 | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | -   |
| 1,4-Dioxane                                        | 123-91-1     | NE             | NE                 | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | -   |
| 2-Butanone (MEK)                                   | 78-93-3      | NE             | NE                 | 38       |   | 24 U     |   | 24 U     |   | 24 U     |   | 24 U     |   | -   |
| 2-Hexanone (MBK)                                   | 591-78-6     | NE             | NE                 | 1.6 U    |   | 1.6 U    |   | 1.6 U    |   | 1.6 U    |   | 1.6 U    |   | -   |
| 4-Ethyltoluene                                     | 622-96-8     | NE             | NE                 | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | -   |
| 4-Methyl-2-pentanone (MIBK)                        | 108-10-1     | NE             | NE                 | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | -   |
| Acetone                                            | 67-64-1      | NE             | NE                 | 270      |   | 200      |   | 600      |   | 53       |   | 52       |   | 2%  |
| Benzene                                            | 71-43-2      | 4.3            | 35                 | 4.1      |   | 9.5      |   | 5.4      |   | 1.4      |   | 1.5      |   | 7%  |
| Benzyl chloride                                    | 100-44-7     | NE             | NE                 | 1 U      |   | 1 U      |   | 1 U      |   | 1 U      |   | 1.0 U    |   | -   |
| Bromodichloromethane                               | 75-27-4      | NE             | NE                 | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | -   |
| Bromoform                                          | 75-25-2      | NE             | NE                 | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | -   |
| Bromomethane                                       | 74-83-9      | NE             | NE                 | 0.78 U   |   | 0.78 U   |   | 0.78 U   |   | 0.78 U   |   | 0.78 U   |   | -   |
| Carbon Disulfide                                   | 75-15-0      | NE             | NE                 | 6.2 U    |   | 6.2 U    |   | 6.2 U    |   | 6.2 U    |   | 6.2 U    |   | -   |
| Carbon Tetrachloride                               | 56-23-5      | 5.7            | 45                 | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | -   |
| Chlorobenzene                                      | 108-90-7     | NE             | NE                 | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | -   |
| Chloroethane                                       | 75-00-3      | 330000         | 1200000            | 0.53 U   |   | 0.53 U   |   | 0.53 U   |   | 0.53 U   |   | 0.53 U   |   | -   |
| Chloroform                                         | 67-66-3      | 1.3            | 12                 | 7.0      |   | 3.7      |   | 3.3      |   | 0.98 U   |   | 0.98 U   |   | -   |
| Chloromethane                                      | 74-87-3      | NE             | NE                 | 0.83 U   |   | 0.83 U   |   | 0.83 U   |   | 0.83 U   |   | 0.83 U   |   | -   |
| cis-1,2-Dichloroethylene                           | 156-59-2     | NE             | NE                 | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | -   |
| cis-1,3-Dichloropropene                            | 10061-01-5   | NE             | NE                 | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | -   |
| Cyclohexane                                        | 110-82-7     | NE             | NE                 | 0.69 U   |   | 0.69 U   |   | 20       |   | 0.69 U   |   | 0.69 U   |   | -   |
| Dibromochloromethane                               | 124-48-1     | NE             | NE                 | 1.7 U    |   | 1.7 U    |   | 1.7 U    |   | 1.7 U    |   | 1.7 U    |   | -   |
| Dichlorodifluoromethane (Freon 12)                 | 75-71-8      | NE             | NE                 | 0.99 U   |   | 0.99 U   |   | 0.99 U   |   | 0.99 U   |   | 0.99 U   |   | -   |
| Ethanol                                            | 64-17-5      | NE             | NE                 | 77       |   | 490      |   | 89       |   | 53       |   | 51       |   | 4%  |
| Ethyl Acetate                                      | 141-78-6     | NE             | NE                 | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | -   |
| Ethylbenzene                                       | 100-41-4     | 13             | 110                | 1.4      |   | 4.4      |   | 1.6      |   | 1.9      |   | 2.2      |   | 15% |
| Heptane                                            | 142-82-5     | NE             | NE                 | 0.82 U   |   | 0.82 U   |   | 5.6      |   | 2.1      |   | 0.82 U   |   | -   |
| Hexachlorobutadiene                                | 87-68-3      | NE             | NE                 | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | -   |
| Hexane                                             | 110-54-3     | NE             | NE                 | 28 U     |   | 28 U     |   | 28 U     |   | 28 U     |   | 28 U     |   | -   |
| Isopropanol                                        | 67-63-0      | NE             | NE                 | 20 U     |   | 20 U     |   | 20 U     |   | 20 U     |   | 20 U     |   | -   |
| m&p-Xylene                                         | 1330-20-7P/M | NE             | NE                 | 4.2      |   | 12       |   | 5.1      |   | 5.3      |   | 6.4      |   | 19% |
| Methyl tert-Butyl Ether (MTBE)                     | 1634-04-4    | NE             | NE                 | 0.72 U   |   | 0.72 U   |   | 0.72 U   |   | 0.72 U   |   | 0.72 U   |   | -   |
| Methylene Chloride                                 | 75-09-2      | 2000           | 27000              | 6.9 U    |   | 6.9 U    |   | 6.9 U    |   | 6.9 U    |   | 6.9 U    |   | -   |
| Naphthalene                                        | 91-20-3      | 1              | 8                  | 1.0 U    |   | 180      |   | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   | -   |
| o-Xylene                                           | 95-47-6      | NE             | NE                 | 1.6      |   | 5.3      |   | 3.3      |   | 1.8      |   | 2.3      |   | 24% |
| Propene                                            | 115-07-1     | NE             | NE                 | 30       |   | 14 U     |   | 14 U     |   | 14 U     |   | 14 U     |   | -   |
| Styrene                                            | 100-42-5     | NE             | NE                 | 0.85 U   |   | 1.8      |   | 0.85 U   |   | 0.85 U   |   | 0.85 U   |   | -   |
| Tetrachloroethylene                                | 127-18-4     | 21             | 170                | 280      |   | 3.6      |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | -   |
| Tetrahydrofuran                                    | 109-99-9     | NE             | NE                 | 5.9 U    |   | 5.9 U    |   | 5.9 U    |   | 5.9 U    |   | 5.9 U    |   | -   |
| Toluene                                            | 108-88-3     | NE             | NE                 | 8.2      |   | 17       |   | 8.5      |   | 8.9      |   | 10       |   | 12% |
| Total Trimethylbenzene                             | 25551-13-7   | 2000           | 7000               | 0.98 U   |   | 104      |   | 4.2      |   | 1.8      |   | 2.0      |   | 11% |
| Total Xylene                                       | 1330-20-7    | NE             | NE                 | 5.8      |   | 17.3     |   | 8.4      |   | 7.1      |   | 8.7      |   | 20% |
| trans-1,2-Dichloroethylene                         | 156-60-5     | NE             | NE                 | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | -   |
| trans-1,3-Dichloropropene                          | 10061-02-6   | NE             | NE                 | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | -   |
| Trichloroethylene                                  | 79-01-6      | 6.7            | 23                 | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | -   |
| Trichlorofluoromethane (Freon 11)                  | 75-69-4      | NE             | NE                 | 4.5 U    |   | 4.5 U    |   | 4.5 U    |   | 4.5 U    |   | 4.5 U    |   | -   |
| Vinyl Acetate                                      | 108-05-4     | NE             | NE                 | 14 U     |   | 14 U     |   | 14 U     |   | 14 U     |   | 14 U     |   | -   |
| Vinyl Chloride                                     | 75-01-4      | 3.7            | 62                 | 0.51 U   |   | 0.51 U   |   | 0.51 U   |   | 0.51 U   |   | 0.51 U   |   | -   |

Table B-10  
Soil Gas Sample Analytical Results

| Sample ID                                          |              | VIS - Resident | VIS - Non-Resident | SV-5     |   | SV-6     |   | SV-7     |   | SV-8     |   | SV-9     |   | SV-10    |   |
|----------------------------------------------------|--------------|----------------|--------------------|----------|---|----------|---|----------|---|----------|---|----------|---|----------|---|
| Sample Date                                        | CAS#         | (µg/m³)        | (µg/m³)            | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q |
| 1,1,1-Trichloroethane                              | 71-55-6      | NE             | NE                 | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.6      |   | 1.1 U    |   |
| 1,1,2,2-Tetrachloroethane                          | 79-34-5      | NE             | NE                 | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   |
| 1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)  | 76-13-1      | NE             | NE                 | 6.1 U    |   | 6.1 U    |   | 6.1 U    |   | 6.1 U    |   | 6.1 U    |   | 6.1 U    |   |
| 1,1,2-Trichloroethane                              | 79-00-5      | NE             | NE                 | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   |
| 1,1-Dichloroethane                                 | 75-34-3      | 21             | 170                | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   |
| 1,1-Dichloroethylene                               | 75-35-4      | 6700           | 23000              | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   |
| 1,2,4-Trichlorobenzene                             | 120-82-1     | NE             | NE                 | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   |
| 1,2,4-Trimethylbenzene                             | 95-63-6      | 2000           | 7000               | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   |
| 1,2-Dibromoethane (EDB)                            | 106-93-4     | NE             | NE                 | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   | 1.5 U    |   |
| 1,2-Dichloro-1,1,2,2-tetrafluoroethane (Freon 114) | 76-14-2      | NE             | NE                 | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   |
| 1,2-Dichlorobenzene                                | 95-50-1      | NE             | NE                 | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   |
| 1,2-Dichloroethane                                 | 107-06-2     | NE             | NE                 | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   | 0.81 U   |   |
| 1,2-Dichloropropane                                | 78-87-5      | NE             | NE                 | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   |
| 1,3,5-Trimethylbenzene                             | 108-67-8     | 2000           | 7000               | 1.2      |   | 0.98 U   |   | 1.7      |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   |
| 1,3-Butadiene                                      | 106-99-0     | NE             | NE                 | 0.44 U   |   | 0.44 U   |   | 0.44 U   |   | 0.44 U   |   | 0.44 U   |   | 0.44 U   |   |
| 1,3-Dichlorobenzene                                | 541-73-1     | NE             | NE                 | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   |
| 1,4-Dichlorobenzene                                | 106-46-7     | NE             | NE                 | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   | 1.2 U    |   |
| 1,4-Dioxane                                        | 123-91-1     | NE             | NE                 | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   |
| 2-Butanone (MEK)                                   | 78-93-3      | NE             | NE                 | 24 U     |   | 24 U     |   | 24 U     |   | 24 U     |   | 24 U     |   | 24 U     |   |
| 2-Hexanone (MBK)                                   | 591-78-6     | NE             | NE                 | 1.6 U    |   | 1.6 U    |   | 1.6 U    |   | 1.6 U    |   | 1.6 U    |   | 1.6 U    |   |
| 4-Ethyltoluene                                     | 622-96-8     | NE             | NE                 | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   |
| 4-Methyl-2-pentanone (MIBK)                        | 108-10-1     | NE             | NE                 | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   |
| Acetone                                            | 67-64-1      | NE             | NE                 | 270      |   | 19 U     |   | 950      |   | 26       |   | 29       |   | 19 U     |   |
| Benzene                                            | 71-43-2      | 4.3            | 35                 | 15       |   | 0.64 U   |   | 4.1      |   | 1.1      |   | 0.88     |   | 0.64 U   |   |
| Benzyl chloride                                    | 100-44-7     | NE             | NE                 | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   |
| Bromodichloromethane                               | 75-27-4      | NE             | NE                 | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   |
| Bromoforn                                          | 75-25-2      | NE             | NE                 | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   |
| Bromomethane                                       | 74-83-9      | NE             | NE                 | 0.78 U   |   | 0.78 U   |   | 0.78 U   |   | 0.78 U   |   | 0.78 U   |   | 0.78 U   |   |
| Carbon Disulfide                                   | 75-15-0      | NE             | NE                 | 6.2 U    |   | 6.2 U    |   | 6.2 U    |   | 6.2 U    |   | 6.2 U    |   | 6.2 U    |   |
| Carbon Tetrachloride                               | 56-23-5      | 5.7            | 45                 | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   | 1.3 U    |   |
| Chlorobenzene                                      | 108-90-7     | NE             | NE                 | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   | 0.92 U   |   |
| Chloroethane                                       | 75-00-3      | 330000         | 1200000            | 0.53 U   |   | 0.53 U   |   | 0.53 U   |   | 0.53 U   |   | 0.53 U   |   | 0.53 U   |   |
| Chloroform                                         | 67-66-3      | 1.3            | 12                 | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   | 1.2      |   | 0.98 U   |   |
| Chloromethane                                      | 74-87-3      | NE             | NE                 | 0.83 U   |   | 0.83 U   |   | 0.83 U   |   | 0.83 U   |   | 0.83 U   |   | 0.83 U   |   |
| cis-1,2-Dichloroethylene                           | 156-59-2     | NE             | NE                 | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   |
| cis-1,3-Dichloropropene                            | 10061-01-5   | NE             | NE                 | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   |
| Cyclohexane                                        | 110-82-7     | NE             | NE                 | 0.69 U   |   | 0.69 U   |   | 0.69 U   |   | 0.69 U   |   | 14       |   | 0.69 U   |   |
| Dibromochloromethane                               | 124-48-1     | NE             | NE                 | 1.7 U    |   | 1.7 U    |   | 1.7 U    |   | 1.7 U    |   | 1.7 U    |   | 1.7 U    |   |
| Dichlorodifluoromethane (Freon 12)                 | 75-71-8      | NE             | NE                 | 0.99 U   |   | 0.99 U   |   | 0.99 U   |   | 0.99 U   |   | 0.99 U   |   | 0.99 U   |   |
| Ethanol                                            | 64-17-5      | NE             | NE                 | 120      |   | 18       |   | 190      |   | 36       |   | 20       |   | 23       |   |
| Ethyl Acetate                                      | 141-78-6     | NE             | NE                 | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   | 7.2 U    |   |
| Ethylbenzene                                       | 100-41-4     | 13             | 110                | 2.2      |   | 0.87 U   |   | 2.5      |   | 0.87 U   |   | 0.87 U   |   | 0.87 U   |   |
| Heptane                                            | 142-82-5     | NE             | NE                 | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   | 0.82 U   |   |
| Hexachlorobutadiene                                | 87-68-3      | NE             | NE                 | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   | 2.1 U    |   |
| Hexane                                             | 110-54-3     | NE             | NE                 | 28 U     |   | 28 U     |   | 28 U     |   | 28 U     |   | 28 U     |   | 28 U     |   |
| Isopropanol                                        | 67-63-0      | NE             | NE                 | 21       |   | 20 U     |   | 69       |   | 20 U     |   | 20 U     |   | 20 U     |   |
| m&p-Xylene                                         | 1330-20-7P/M | NE             | NE                 | 4.9      |   | 1.7 U    |   | 7.9      |   | 1.7 U    |   | 1.7 U    |   | 1.7 U    |   |
| Methyl tert-Butyl Ether (MTBE)                     | 1634-04-4    | NE             | NE                 | 0.72 U   |   | 0.72 U   |   | 0.72 U   |   | 0.72 U   |   | 0.72 U   |   | 0.72 U   |   |
| Methylene Chloride                                 | 75-09-2      | 2000           | 27000              | 6.9 U    |   | 6.9 U    |   | 6.9 U    |   | 6.9 U    |   | 6.9 U    |   | 6.9 U    |   |
| Naphthalene                                        | 91-20-3      | 1              | 8                  | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   | 1.0 U    |   |
| o-Xylene                                           | 95-47-6      | NE             | NE                 | 1.9      |   | 0.87 U   |   | 3.8      |   | 0.87 U   |   | 0.87 U   |   | 0.87 U   |   |
| Propene                                            | 115-07-1     | NE             | NE                 | 14 U     |   | 14 U     |   | 14 U     |   | 14 U     |   | 29       |   | 14 U     |   |
| Styrene                                            | 100-42-5     | NE             | NE                 | 0.85 U   |   | 0.85 U   |   | 0.85 U   |   | 0.85 U   |   | 0.85 U   |   | 0.85 U   |   |
| Tetrachloroethylene                                | 127-18-4     | 21             | 170                | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   | 1.4 U    |   |
| Tetrahydrofuran                                    | 109-99-9     | NE             | NE                 | 5.9 U    |   | 5.9 U    |   | 5.9 U    |   | 5.9 U    |   | 5.9 U    |   | 5.9 U    |   |
| Toluene                                            | 108-88-3     | NE             | NE                 | 12       |   | 0.87     |   | 12       |   | 2.2      |   | 3.2      |   | 0.75     |   |
| Total Trimethylbenzene                             | 25551-13-7   | 2000           | 7000               | 1.2      |   | 0.98 U   |   | 1.7      |   | 0.98 U   |   | 0.98 U   |   | 0.98 U   |   |
| Total Xylene                                       | 1330-20-7    | NE             | NE                 | 6.8      |   | 2.57 U   |   | 11.7     |   | 2.57 U   |   | 2.57 U   |   | 2.57 U   |   |
| trans-1,2-Dichloroethylene                         | 156-60-5     | NE             | NE                 | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   | 0.79 U   |   |
| trans-1,3-Dichloropropene                          | 10061-02-6   | NE             | NE                 | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   | 0.91 U   |   |
| Trichloroethylene                                  | 79-01-6      | 6.7            | 23                 | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   | 1.1 U    |   |
| Trichlorofluoromethane (Freon 11)                  | 75-69-4      | NE             | NE                 | 4.5 U    |   | 4.5 U    |   | 4.5 U    |   | 4.5 U    |   | 4.5 U    |   | 4.5 U    |   |
| Vinyl Acetate                                      | 108-05-4     | NE             | NE                 | 14 U     |   | 14 U     |   | 14 U     |   | 14 U     |   | 14 U     |   | 14 U     |   |
| Vinyl Chloride                                     | 75-01-4      | 3.7            | 62                 | 0.51 U   |   | 0.51 U   |   | 0.51 U   |   | 0.51 U   |   | 0.51 U   |   | 0.51 U   |   |

Table B-10  
Soil Gas Sample Analytical Results

| Sample ID                     | Resident VIS | Non-resident VIS | SV-11    | SV-12    | SV-12-FD | SV-13    | SV-14    | SV-15    | RPD       |
|-------------------------------|--------------|------------------|----------|----------|----------|----------|----------|----------|-----------|
| Sample Date                   | CAS#         | (µg/m3)          | 3/1/2022 | 3/1/2022 | 3/1/2022 | 3/1/2022 | 3/1/2022 | 3/1/2022 |           |
| 1,1,1,2-Tetrachloroethane     | 630-20-6     | NE               | NE       | 1.90 U   | 1.90 U   | 1.90 U   | 1.90 U   | 1.90 U   | --        |
| 1,1,1-Trichloroethane         | 71-55-6      | NE               | NE       | 1,730    | 30.7     | 28.2     | 13.6 U   | 13.6 U   | 56.7 8%   |
| 1,1,2,2-Tetrachloroethane     | 79-34-5      | NE               | NE       | 1.05 U   | 1.05 U   | 1.05 U   | 1.05 U   | 1.05 U   | --        |
| 1,1,2-Trichloroethane         | 79-00-5      | NE               | NE       | 0.90 U   | 0.90 U   | 0.90 U   | 0.90 U   | 0.90 U   | --        |
| 1,1-Dichloroethane            | 75-34-3      | 21               | 170      | 9.18 U   | 9.18 U   | 9.18 U   | 9.18 U   | 9.18 U   | --        |
| 1,1-Dichloroethene            | 75-35-4      | 6700             | 23000    | 9.9 U    | 9.9 U    | 9.9 U    | 9.9 U    | 9.9 U    | --        |
| 1,2,4-Trichlorobenzene        | 120-82-1     | NE               | NE       | 10.5 U   | 10.5 U   | 10.5 U   | 10.5 U   | 10.5 U   | --        |
| 1,2,4-Trimethylbenzene        | 95-63-6      | 2000             | 7000     | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | --        |
| 1,2-Dibromoethane(EDB)        | 106-93-4     | NE               | NE       | 1.92 U   | 1.92 U   | 1.92 U   | 1.92 U   | 1.92 U   | --        |
| 1,2-Dichlorobenzene           | 95-50-1      | NE               | NE       | 15.0 U   | 15.0 U   | 15.0 U   | 15.0 U   | 15.0 U   | --        |
| 1,2-Dichloroethane            | 107-06-2     | NE               | NE       | 1.01 U   | 1.01 U   | 1.01 U   | 1.01 U   | 1.01 U   | --        |
| 1,2-dichloropropane           | 78-87-5      | NE               | NE       | 1.40 U   | 1.40 U   | 1.40 U   | 1.40 U   | 1.40 U   | --        |
| 1,2-Dichlorotetrafluoroethane | 76-14-2      | NE               | NE       | 17.5 U   | 17.5 U   | 17.5 U   | 17.5 U   | 17.5 U   | --        |
| 1,3,5-Trimethylbenzene        | 108-67-8     | 2000             | 7000     | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | --        |
| 1,3-Butadiene                 | 106-99-0     | NE               | NE       | 0.47 U   | 12.9     | 0.47 U   | 0.47 U   | 0.47 U   | --        |
| 1,3-Dichlorobenzene           | 541-73-1     | NE               | NE       | 15.0 U   | 15.0 U   | 15.0 U   | 15.0 U   | 15.0 U   | --        |
| 1,4-Dichlorobenzene           | 106-46-7     | NE               | NE       | 1.30 U   | 1.30 U   | 1.30 U   | 1.30 U   | 1.30 U   | --        |
| 1,4-Dioxane                   | 123-91-1     | NE               | NE       | 2.80 U   | 2.80 U   | 2.80 U   | 2.80 U   | 2.80 U   | --        |
| 2-Hexanone(MBK)               | 591-78-6     | NE               | NE       | 10.2 U   | 10.2 U   | 10.2 U   | 10.2 U   | 10.2 U   | --        |
| 4-Ethyltoluene                | 622-96-8     | NE               | NE       | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | --        |
| 4-Isopropyltoluene            | 99-87-6      | NE               | NE       | 13.7 U   | 13.7 U   | 13.7 U   | 13.7 U   | 13.7 U   | --        |
| 4-Methyl-2-pentanone(MIBK)    | 108-10-1     | NE               | NE       | 10.2 U   | 10.2 U   | 10.2 U   | 10.2 U   | 10.2 U   | --        |
| Acetone                       | 67-64-1      | NE               | NE       | 22.4     | 20.3     | 25.2     | 59.1     | 35.6     | 56.5 22%  |
| Acrylonitrile                 | 107-13-1     | NE               | NE       | 5.42 U   | 5.42 U   | 5.42 U   | 5.42 U   | 5.42 U   | --        |
| Benzene                       | 71-43-2      | 4.3              | 35       | 0.65 U   | 1.39     | 1.42     | 1.15     | 0.65 U   | 0.65 U 2% |
| Benzyl chloride               | 100-44-7     | NE               | NE       | 1.25 U   | 1.25 U   | 1.25 U   | 1.25 U   | 1.25 U   | --        |
| Bromodichloromethane          | 75-27-4      | NE               | NE       | 1.25 U   | 1.25 U   | 1.25 U   | 1.25 U   | 1.25 U   | --        |
| Bromoform                     | 75-25-2      | NE               | NE       | 25.8 U   | 25.8 U   | 25.8 U   | 25.8 U   | 25.8 U   | --        |
| Bromomethane                  | 74-83-9      | NE               | NE       | 9.7 U    | 9.7 U    | 9.7 U    | 9.7 U    | 9.7 U    | --        |
| Carbon Disulfide              | 75-15-0      | NE               | NE       | 7.78 U   | 7.78 U   | 7.78 U   | 23.6     | 573      | 8.46 --   |
| Carbon Tetrachloride          | 56-23-5      | 5.7              | 45       | 0.23 U   | 0.23 U   | 0.23 U   | 0.23 U   | 0.23 U   | --        |
| Chlorobenzene                 | 108-90-7     | NE               | NE       | 11.5 U   | 11.5 U   | 11.5 U   | 11.5 U   | 11.5 U   | --        |
| Chloroethane                  | 75-00-3      | 330000           | 1200000  | 6.59 U   | 6.59 U   | 6.59 U   | 6.59 U   | 6.59 U   | --        |
| Chloroform                    | 67-66-3      | 1.3              | 12       | 11.4     | 9.27     | 8.44     | 1.25 U   | 3.17     | 1.25 U 9% |
| Chloromethane                 | 74-87-3      | NE               | NE       | 5.16 U   | 5.16 U   | 5.16 U   | 5.16 U   | 5.16 U   | --        |
| Cis-1,2-Dichloroethene        | 156-59-2     | NE               | NE       | 9.9 U    | 9.9 U    | 9.9 U    | 9.9 U    | 9.9 U    | --        |
| cis-1,3-Dichloropropene       | 10061-01-5   | NE               | NE       | 3.50 U   | 3.50 U   | 3.50 U   | 3.50 U   | 3.50 U   | --        |
| Cyclohexane                   | 110-82-7     | NE               | NE       | 8.60 U   | 8.60 U   | 8.60 U   | 28.5     | 8.60 U   | 8.60 U -- |
| Dibromochloromethane          | 124-48-1     | NE               | NE       | 21.3 U   | 21.3 U   | 21.3 U   | 21.3 U   | 21.3 U   | --        |
| Dichlorodifluoromethane       | 75-71-8      | NE               | NE       | 12.4 U   | 12.4 U   | 12.4 U   | 12.4 U   | 12.4 U   | --        |
| Ethanol                       | 64-17-5      | NE               | NE       | 10.4     | 21.8     | 9.9      | 11.9     | 8.96     | 15.5 75%  |
| Ethyl acetate                 | 141-78-6     | NE               | NE       | 9.00 U   | 9.00 U   | 9.00 U   | 9.00 U   | 9.00 U   | --        |
| Ethylbenzene                  | 100-41-4     | 13               | 110      | 5.51 U   | 5.51 U   | 5.51 U   | 5.51 U   | 5.51 U   | --        |
| Heptane                       | 142-82-5     | NE               | NE       | 10.2 U   | 10.2 U   | 10.2 U   | 10.2 U   | 10.2 U   | --        |
| Hexachlorobutadiene           | 87-68-3      | NE               | NE       | 1.87 U   | 1.87 U   | 1.87 U   | 1.87 U   | 1.87 U   | --        |
| Hexane                        | 110-54-3     | NE               | NE       | 8.81 U   | 8.81 U   | 8.81 U   | 8.81 U   | 8.81 U   | --        |
| Isopropylalcohol              | 67-63-0      | NE               | NE       | 6.14 U   | 6.14 U   | 6.14 U   | 6.14 U   | 6.14 U   | 8.89 --   |
| Isopropylbenzene              | 98-82-8      | NE               | NE       | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | --        |
| m,p-Xylene                    | 179601-23-1  | NE               | NE       | 21.7 U   | 21.7 U   | 21.7 U   | 21.7 U   | 21.7 U   | --        |
| Methyl Ethyl Ketone           | 78-93-3      | NE               | NE       | 7.37 U   | 11.1     | 7.37 U   | 7.37 U   | 7.37 U   | 9.28 --   |
| Methyl tert-butyl ether(MTBE) | 1634-04-4    | NE               | NE       | 9.01 U   | 9.01 U   | 9.01 U   | 9.01 U   | 9.01 U   | --        |
| Methylene Chloride            | 75-09-2      | 2000             | 27000    | 8.68 U   | 8.68 U   | 8.68 U   | 8.68 U   | 8.68 U   | --        |
| n-Butylbenzene                | 104-51-8     | NE               | NE       | 13.7 U   | 13.7 U   | 13.7 U   | 13.7 U   | 13.7 U   | --        |
| Naphthalene                   | 91-20-3      | 1.0              | 8.0      | 5.0 U    | 5.0 U    | 5.0 U    | 5.0 U    | 5.0 U    | --        |
| o-Xylene                      | 95-47-6      | NE               | NE       | 10.8 U   | 10.8 U   | 10.8 U   | 10.8 U   | 10.8 U   | --        |
| Propylene                     | 115-07-1     | NE               | NE       | 4.3 U    | 87.4     | 83.6     | 1810     | 110      | 13.8 4%   |
| sec-Butylbenzene              | 135-98-8     | NE               | NE       | 13.7 U   | 13.7 U   | 13.7 U   | 13.7 U   | 13.7 U   | --        |
| Styrene                       | 100-42-5     | NE               | NE       | 10.6 U   | 10.6 U   | 10.6 U   | 10.6 U   | 10.6 U   | --        |
| Tetrachloroethene             | 127-18-4     | 21               | 170      | 3.15 U   | 3.15 U   | 3.15 U   | 3.15 U   | 3.15 U   | --        |
| Tetrahydrofuran               | 109-99-9     | NE               | NE       | 7.37 U   | 7.37 U   | 7.37 U   | 7.37 U   | 7.37 U   | --        |
| Toluene                       | 108-88-3     | NE               | NE       | 9.42 U   | 9.42 U   | 9.42 U   | 9.42 U   | 9.42 U   | --        |
| Total Trimethylbenzene        | 25551-13-7   | NE               | NE       | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | 12.3 U   | --        |
| Total Xylene                  | 1330-20-7    | NE               | NE       | 10.8 U   | 10.8 U   | 10.8 U   | 10.8 U   | 10.8 U   | --        |
| Trans-1,2-Dichloroethene      | 156-60-5     | NE               | NE       | 9.9 U    | 9.9 U    | 9.9 U    | 9.9 U    | 9.9 U    | --        |
| trans-1,3-Dichloropropene     | 10061-02-6   | NE               | NE       | 3.50 U   | 3.50 U   | 3.50 U   | 3.50 U   | 3.50 U   | --        |
| Trichloroethene               | 79-01-6      | 6.7              | 23       | 0.99 U   | 0.99 U   | 0.99 U   | 0.99 U   | 0.99 U   | --        |
| Trichlorofluoromethane        | 75-69-4      | NE               | NE       | 14.0 U   | 14.0 U   | 14.0 U   | 14.0 U   | 14.0 U   | --        |
| Trichlorotrifluoroethane      | 76-13-1      | NE               | NE       | 19.1 U   | 19.1 U   | 19.1 U   | 19.1 U   | 19.1 U   | --        |
| Vinyl Chloride                | 75-01-4      | 3.7              | 62       | 0.55 U   | 0.55 U   | 0.55 U   | 0.55 U   | 0.55 U   | --        |

Table B-10  
Soil Gas Sample Analytical Results

| Sample ID<br>Sample Date      | CAS#        | Resident VIS<br>(µg/m3) | Non-resident VIS<br>(µg/m3) | EW-01       |   | EW-01-FD    |   | EW-02       |   | RPD (EW-01) |
|-------------------------------|-------------|-------------------------|-----------------------------|-------------|---|-------------|---|-------------|---|-------------|
|                               |             |                         |                             | 2/28/2022   | Q | 2/28/2022   | Q | 2/28/2022   | Q |             |
| 1,1,1,2-Tetrachloroethane     | 630-20-6    | NE                      | NE                          | 0.38 U      |   | 0.38 U      |   | 0.38 U      |   | --          |
| 1,1,1-Trichloroethane         | 71-55-6     | NE                      | NE                          | <b>184</b>  |   | <b>200</b>  |   | <b>2.92</b> |   | 8%          |
| 1,1,2,2-Tetrachloroethane     | 79-34-5     | NE                      | NE                          | 0.21 U      |   | 0.21 U      |   | 0.21 U      |   | --          |
| 1,1,2-Trichloroethane         | 79-00-5     | NE                      | NE                          | 0.18 U      |   | 0.18 U      |   | 0.18 U      |   | --          |
| 1,1-Dichloroethane            | 75-34-3     | 21                      | 170                         | 1.84 U      |   | 1.84 U      |   | 1.84 U      |   | --          |
| 1,1-Dichloroethene            | 75-35-4     | 6700                    | 23000                       | 1.98 U      |   | 1.98 U      |   | 1.98 U      |   | --          |
| 1,2,4-Trichlorobenzene        | 120-82-1    | NE                      | NE                          | 2.10 U      |   | 2.10 U      |   | 2.10 U      |   | --          |
| 1,2,4-Trimethylbenzene        | 95-63-6     | 2000                    | 7000                        | 2.46 U      |   | 2.46 U      |   | 2.46 U      |   | --          |
| 1,2-Dibromoethane(EDB)        | 106-93-4    | NE                      | NE                          | 0.38 U      |   | 0.38 U      |   | 0.38 U      |   | --          |
| 1,2-Dichlorobenzene           | 95-50-1     | NE                      | NE                          | 3.00 U      |   | 3.00 U      |   | 3.00 U      |   | --          |
| 1,2-Dichloroethane            | 107-06-2    | NE                      | NE                          | 0.20 U      |   | 0.20 U      |   | 0.20 U      |   | --          |
| 1,2-dichloropropane           | 78-87-5     | NE                      | NE                          | 0.28 U      |   | 0.28 U      |   | 0.28 U      |   | --          |
| 1,2-Dichlorotetrafluoroethane | 76-14-2     | NE                      | NE                          | 3.49 U      |   | 3.49 U      |   | 3.49 U      |   | --          |
| 1,3,5-Trimethylbenzene        | 108-67-8    | 2000                    | 7000                        | 2.46 U      |   | 2.46 U      |   | 2.46 U      |   | --          |
| 1,3-Butadiene                 | 106-99-0    | NE                      | NE                          | 0.10 U      |   | 0.10 U      |   | 0.10 U      |   | --          |
| 1,3-Dichlorobenzene           | 541-73-1    | NE                      | NE                          | 3.00 U      |   | 3.00 U      |   | 3.00 U      |   | --          |
| 1,4-Dichlorobenzene           | 106-46-7    | NE                      | NE                          | <b>0.72</b> |   | 0.26 U      |   | 0.26 U      |   | --          |
| 1,4-Dioxane                   | 123-91-1    | NE                      | NE                          | 0.56 U      |   | 0.56 U      |   | 0.56 U      |   | --          |
| 2-Hexanone(MBK)               | 591-78-6    | NE                      | NE                          | 2.05 U      |   | 2.05 U      |   | 2.05 U      |   | --          |
| 4-Ethyltoluene                | 622-96-8    | NE                      | NE                          | 2.46 U      |   | 2.46 U      |   | 2.46 U      |   | --          |
| 4-Isopropyltoluene            | 99-87-6     | NE                      | NE                          | 2.74 U      |   | 2.74 U      |   | 2.74 U      |   | --          |
| 4-Methyl-2-pentanone(MIBK)    | 108-10-1    | NE                      | NE                          | 2.05 U      |   | 2.05 U      |   | 2.05 U      |   | --          |
| Acetone                       | 67-64-1     | NE                      | NE                          | <b>2.87</b> |   | <b>3.01</b> |   | <b>5.46</b> |   | 5%          |
| Acrylonitrile                 | 107-13-1    | NE                      | NE                          | 1.08 U      |   | 1.08 U      |   | 1.08 U      |   | --          |
| Benzene                       | 71-43-2     | 4.3                     | 35                          | 0.13 U      |   | 0.13 U      |   | 0.13 U      |   | --          |
| Benzyl chloride               | 100-44-7    | NE                      | NE                          | 0.25 U      |   | 0.25 U      |   | 0.25 U      |   | --          |
| Bromodichloromethane          | 75-27-4     | NE                      | NE                          | 0.25 U      |   | 0.25 U      |   | 0.25 U      |   | --          |
| Bromoform                     | 75-25-2     | NE                      | NE                          | 5.17 U      |   | 5.17 U      |   | 5.17 U      |   | --          |
| Bromomethane                  | 74-83-9     | NE                      | NE                          | 1.94 U      |   | 1.94 U      |   | 1.94 U      |   | --          |
| Carbon Disulfide              | 75-15-0     | NE                      | NE                          | 1.56 U      |   | 1.56 U      |   | 1.56 U      |   | --          |
| Carbon Tetrachloride          | 56-23-5     | 5.7                     | 45                          | <b>0.15</b> |   | 0.05 U      |   | 0.05 U      |   | --          |
| Chlorobenzene                 | 108-90-7    | NE                      | NE                          | 2.30 U      |   | 2.30 U      |   | 2.30 U      |   | --          |
| Chloroethane                  | 75-00-3     | 330000                  | 1200000                     | 1.32 U      |   | 1.32 U      |   | 1.32 U      |   | --          |
| Chloroform                    | 67-66-3     | 1.3                     | 12                          | <b>3.34</b> |   | <b>4.18</b> |   | <b>0.41</b> |   | 22%         |
| Chloromethane                 | 74-87-3     | NE                      | NE                          | 1.03 U      |   | 1.03 U      |   | 1.03 U      |   | --          |
| Cis-1,2-Dichloroethene        | 156-59-2    | NE                      | NE                          | 1.98 U      |   | 1.98 U      |   | 1.98 U      |   | --          |
| cis-1,3-Dichloropropene       | 10061-01-5  | NE                      | NE                          | 0.70 U      |   | 0.70 U      |   | 0.70 U      |   | --          |
| Cyclohexane                   | 110-82-7    | NE                      | NE                          | 1.72 U      |   | 1.72 U      |   | 1.72 U      |   | --          |
| Dibromochloromethane          | 124-48-1    | NE                      | NE                          | 4.26 U      |   | 4.26 U      |   | 4.26 U      |   | --          |
| Dichlorodifluoromethane       | 75-71-8     | NE                      | NE                          | 2.47 U      |   | 2.47 U      |   | 2.47 U      |   | --          |
| Ethanol                       | 64-17-5     | NE                      | NE                          | <b>4.03</b> |   | <b>5.31</b> |   | 0.94 U      |   | 27%         |
| Ethyl acetate                 | 141-78-6    | NE                      | NE                          | 1.8 U       |   | 1.8 U       |   | 1.8 U       |   | --          |
| Ethylbenzene                  | 100-41-4    | 13                      | 110                         | 1.10 U      |   | 1.10 U      |   | <b>2.32</b> |   | --          |
| Heptane                       | 142-82-5    | NE                      | NE                          | 2.05 U      |   | 2.05 U      |   | 2.05 U      |   | --          |
| Hexachlorobutadiene           | 87-68-3     | NE                      | NE                          | 0.37 U      |   | 0.37 U      |   | 0.37 U      |   | --          |
| Hexane                        | 110-54-3    | NE                      | NE                          | 1.76 U      |   | 1.76 U      |   | 1.76 U      |   | --          |
| Isopropylalcohol              | 67-63-0     | NE                      | NE                          | <b>5.70</b> |   | <b>9.6</b>  |   | <b>2.90</b> |   | 51%         |
| Isopropylbenzene              | 98-82-8     | NE                      | NE                          | 2.46 U      |   | 2.46 U      |   | 2.46 U      |   | --          |
| m,p-Xylene                    | 179601-23-1 | NE                      | NE                          | 4.34 U      |   | 4.34 U      |   | <b>9.9</b>  |   | --          |
| Methyl Ethyl Ketone           | 78-93-3     | NE                      | NE                          | 1.47 U      |   | 1.47 U      |   | <b>6.78</b> |   | --          |
| Methyl tert-butyl ether(MTBE) | 1634-04-4   | NE                      | NE                          | 1.80 U      |   | 1.80 U      |   | 1.80 U      |   | --          |
| Methylene Chloride            | 75-09-2     | 2000                    | 27000                       | <b>2.81</b> |   | 1.74 U      |   | 1.74 U      |   | --          |
| n-Butylbenzene                | 104-51-8    | NE                      | NE                          | 2.74 U      |   | 2.74 U      |   | 2.74 U      |   | --          |
| o-Xylene                      | 95-47-6     | NE                      | NE                          | 2.17 U      |   | 2.17 U      |   | <b>3.06</b> |   | --          |
| Propylene                     | 115-07-1    | NE                      | NE                          | 0.86 U      |   | 0.86 U      |   | 0.86 U      |   | --          |
| sec-Butylbenzene              | 135-98-8    | NE                      | NE                          | 2.74 U      |   | 2.74 U      |   | 2.74 U      |   | --          |
| Styrene                       | 100-42-5    | NE                      | NE                          | 2.13 U      |   | 2.13 U      |   | 2.13 U      |   | --          |
| Tetrachloroethene             | 127-18-4    | 21                      | 170                         | 0.63 U      |   | 0.63 U      |   | 0.63 U      |   | --          |
| Tetrahydrofuran               | 109-99-9    | NE                      | NE                          | 1.47 U      |   | 1.47 U      |   | 1.47 U      |   | --          |
| Toluene                       | 108-88-3    | NE                      | NE                          | 1.88 U      |   | 1.88 U      |   | <b>4.71</b> |   | --          |
| Total Trimethylbenzene        | 25551-13-7  | NE                      | NE                          | 2.46 U      |   | 2.46 U      |   | 2.46 U      |   | --          |
| Total Xylene                  | 1330-20-7   | NE                      | NE                          | 2.17 U      |   | 2.17 U      |   | <b>3.06</b> |   | --          |
| Trans-1,2-Dichloroethene      | 156-60-5    | NE                      | NE                          | 1.98 U      |   | 1.98 U      |   | 1.98 U      |   | --          |
| trans-1,3-Dichloropropene     | 10061-02-6  | NE                      | NE                          | 0.70 U      |   | 0.70 U      |   | 0.70 U      |   | --          |
| Trichloroethene               | 79-01-6     | 6.7                     | 23                          | 0.20 U      |   | 0.20 U      |   | 0.20 U      |   | --          |
| Trichlorofluoromethane        | 75-69-4     | NE                      | NE                          | 2.81 U      |   | 2.81 U      |   | 2.81 U      |   | --          |
| Trichlorotrifluoroethane      | 76-13-1     | NE                      | NE                          | 3.83 U      |   | 3.83 U      |   | 3.83 U      |   | --          |
| Vinyl Chloride                | 75-01-4     | 3.7                     | 62                          | 0.11 U      |   | 0.11 U      |   | 0.11 U      |   | --          |

Key:  
VIS - Vapor Intrusion Standards - Sub-slab Soil Gas from Investigation and Remediation of Contaminated Properties Rule, July 2015  
µg/m<sup>3</sup> - micrograms per cubic meter  
**Bold** results indicate detections of the analyte  
Shaded results indicate an exceedance of the residential enforcement standard(s)  
Italicized results indicate an exceedance of the non-residential enforcement standard(s)  
NE - screening level not established  
RPD - relative percent difference  
Q - qualifier  
U - analyte not detected, laboratory reporting limit provided

Table B-11  
Polychlorinated Biphenyl Analytical Results – Porous Building Materials

| Sample ID    |            | TSCA: Solid Porous<br>Media High Occupancy<br>Walkaway | TSCA: Solid Porous<br>Media Low Occupancy<br>Walkaway | WD-1     |   | WD-2     |   | WD-2-FD  |   | WD-3     |   | WD-4     |   |
|--------------|------------|--------------------------------------------------------|-------------------------------------------------------|----------|---|----------|---|----------|---|----------|---|----------|---|
| Sample Date  | CAS#       |                                                        |                                                       | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q |
|              |            | (mg/Kg)                                                | (mg/Kg)                                               |          |   |          |   |          |   |          |   |          |   |
| Aroclor-1016 | 12674-11-2 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Aroclor-1221 | 11104-28-2 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Aroclor-1232 | 11141-16-5 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Aroclor-1242 | 53469-21-9 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Aroclor-1248 | 12672-29-6 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Aroclor-1254 | 11097-69-1 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Aroclor-1260 | 11096-82-5 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Aroclor-1262 | 37324-23-5 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Aroclor-1268 | 11100-14-4 | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |
| Total PCBs   | 1336-36-3  | 1                                                      | 25                                                    | 0.94 U   |   | 0.49 U   |   | 0.49 U   |   | 0.49 U   |   | 0.98 U   |   |

| Sample ID    |            | TSCA: Solid Porous<br>Media High Occupancy<br>Walkaway | TSCA: Solid Porous<br>Media Low Occupancy<br>Walkaway | WD-5     |   | WD-6     |   |
|--------------|------------|--------------------------------------------------------|-------------------------------------------------------|----------|---|----------|---|
| Sample Date  | CAS#       |                                                        |                                                       | 6/2/2021 | Q | 6/2/2021 | Q |
|              |            | (mg/Kg)                                                | (mg/Kg)                                               |          |   |          |   |
| Aroclor-1016 | 12674-11-2 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Aroclor-1221 | 11104-28-2 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Aroclor-1232 | 11141-16-5 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Aroclor-1242 | 53469-21-9 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Aroclor-1248 | 12672-29-6 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Aroclor-1254 | 11097-69-1 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Aroclor-1260 | 11096-82-5 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Aroclor-1262 | 37324-23-5 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Aroclor-1268 | 11100-14-4 | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |
| Total PCBs   | 1336-36-3  | 1                                                      | 25                                                    | 0.098 U  |   | 0.98 U   |   |

Key:  
TSCA - Toxic Substance Control Act  
mg/kg - milligrams per kilogram (parts per million)  
Bold results indicate detections of the analyte  
Shaded results indicate an exceedence of the TSCA High Occupancy Walkaway Criteria  
Q - laboratory result qualifier  
U - Analyte not detected; limit of quantitation listed

Table B-12  
Polychlorinated Biphenyl Analytical Results – Non-Porous Building Materials

| Sample ID    |            | TSCA: Solid Non-Porous<br>Media High Occupancy<br>Walkaway | TSCA: Solid Non-Porous<br>Media Low Occupancy | WP-1     |   | WP-2     |   | WP-3     |   | WP-4      |   |
|--------------|------------|------------------------------------------------------------|-----------------------------------------------|----------|---|----------|---|----------|---|-----------|---|
| Sample Date  | CAS#       |                                                            |                                               | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021  | Q |
|              |            | (µg/100 cm2)                                               | (µg/100 cm2)                                  |          |   |          |   |          |   |           |   |
| Aroclor-1016 | 12674-11-2 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1221 | 11104-28-2 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1232 | 11141-16-5 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1242 | 53469-21-9 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1248 | 12672-29-6 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1254 | 11097-69-1 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1260 | 11096-82-5 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1262 | 37324-23-5 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1268 | 11100-14-4 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Total PCBs   | 1336-36-3  | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Sample ID    |            | TSCA: Solid Non-Porous<br>Media High Occupancy<br>Walkaway | TSCA: Solid Non-Porous<br>Media Low Occupancy | WP-5     |   | WP-5-FD  |   | WP-6     |   | EB-060221 |   |
| Sample Date  | CAS#       |                                                            |                                               | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021 | Q | 6/2/2021  | Q |
|              |            | (µg/100 cm2)                                               | (µg/100 cm2)                                  |          |   |          |   |          |   |           |   |
| Aroclor-1016 | 12674-11-2 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1221 | 11104-28-2 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1232 | 11141-16-5 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1242 | 53469-21-9 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1248 | 12672-29-6 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1254 | 11097-69-1 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1260 | 11096-82-5 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1262 | 37324-23-5 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Aroclor-1268 | 11100-14-4 | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |
| Total PCBs   | 1336-36-3  | 10                                                         | 100                                           | 0.20     | U | 0.20     | U | 0.20     | U | 0.20      | U |

Key:

TSCA - Toxic Substance Control Act

mg/kg - milligrams per kilogram (parts per million)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedence of the TSCA High Occupancy Walkaway Criteria

Q - laboratory result qualifier

U - Analyte not detected; limit of quantitation listed

Table B-13  
Solid (Porous) Sample Analytical Results

| Sample ID    |            | TSCA: Solid Porous Media<br>High Occupancy Walkaway | BO-1     |   |
|--------------|------------|-----------------------------------------------------|----------|---|
| Sample Date  | CAS#       |                                                     | 6/2/2021 | Q |
|              |            | (mg/Kg)                                             |          |   |
| Aroclor-1016 | 12674-11-2 | 1                                                   | 0.73     | U |
| Aroclor-1221 | 11104-28-2 | 1                                                   | 0.73     | U |
| Aroclor-1232 | 11141-16-5 | 1                                                   | 0.73     | U |
| Aroclor-1242 | 53469-21-9 | 1                                                   | 0.73     | U |
| Aroclor-1248 | 12672-29-6 | 1                                                   | 0.73     | U |
| Aroclor-1254 | 11097-69-1 | 1                                                   | 0.73     | U |
| Aroclor-1260 | 11096-82-5 | 1                                                   | 0.73     | U |
| Aroclor-1262 | 37324-23-5 | 1                                                   | 0.73     | U |
| Aroclor-1268 | 11100-14-4 | 1                                                   | 0.73     | U |
| Total PCBs   | 1336-36-3  | 1                                                   | 0.73     | U |

Key:

TSCA - Toxic Substance Control Act

mg/kg - milligrams per kilogram (parts per million)

Bold results indicate detections of the analyte

Shaded results indicate an exceedance of the TSCA High Occupancy Walkaway Criteria

Q - laboratory result qualifier

U - Analyte not detected; limit of quantitation listed

Table B-14  
Indoor Air Sample Analytical Results

| Sample ID                                          | Sample Date  | IAS - Resident | IAS - Non-Resident | AA-1         | Q | IA-1        | Q | IA-1-FD     | Q | IA-2        | Q | RPD |
|----------------------------------------------------|--------------|----------------|--------------------|--------------|---|-------------|---|-------------|---|-------------|---|-----|
|                                                    |              | (µg/m³)        | (µg/m³)            | 8/2/2021     |   | 8/2/2021    |   | 8/2/2021    |   | 8/2/2021    |   |     |
| 1,1,1-Trichloroethane                              | 71-55-6      | NE             | NE                 | 0.19 U       |   | <b>34</b>   |   | <b>35</b>   |   | 0.19 U      |   | 3%  |
| 1,1,2,2-Tetrachloroethane                          | 79-34-5      | NE             | NE                 | 0.048 U      |   | 0.048 U     |   | 0.048 U     |   | 0.048 U     |   | -   |
| 1,1,2-Trichloro-1,2,2-trifluoroethane (Freon 113)  | 76-13-1      | NE             | NE                 | 1.1 U        |   | 1.1 U       |   | 1.1 U       |   | 1.1 U       |   | -   |
| 1,1,2-Trichloroethane                              | 79-00-5      | NE             | NE                 | 0.038 U      |   | 0.038 U     |   | 0.038 U     |   | 0.038 U     |   | -   |
| 1,1-Dichloroethane                                 | 75-34-3      | 0.63           | 5.11               | 0.028 U      |   | 0.028 U     |   | 0.028 U     |   | 0.028 U     |   | -   |
| 1,1-Dichloroethylene                               | 75-35-4      | 200            | 700.8              | 0.028 U      |   | 0.028 U     |   | 0.028 U     |   | 0.028 U     |   | -   |
| 1,2,4-Trichlorobenzene                             | 120-82-1     | NE             | NE                 | 0.26 U       |   | 0.26 U      |   | 0.26 U      |   | 0.26 U      |   | -   |
| 1,2,4-Trimethylbenzene                             | 95-63-6      | 60             | 210.24             | 0.17 U       |   | <b>8.9</b>  |   | <b>9.1</b>  |   | <b>0.25</b> |   | 2%  |
| 1,2-Dibromoethane (EDB)                            | 106-93-4     | NE             | NE                 | 0.054 U      |   | 0.054 U     |   | 0.054 U     |   | 0.054 U     |   | -   |
| 1,2-Dichloro-1,1,2,2-tetrafluoroethane (Freon 114) | 76-14-2      | NE             | NE                 | 0.24 U       |   | 0.24 U      |   | 0.24 U      |   | 0.24 U      |   | -   |
| 1,2-Dichlorobenzene                                | 95-50-1      | NE             | NE                 | 0.21 U       |   | 0.21 U      |   | 0.21 U      |   | 0.21 U      |   | -   |
| 1,2-Dichloroethane                                 | 107-06-2     | NE             | NE                 | 0.028 U      |   | 0.028 U     |   | 0.028 U     |   | 0.028 U     |   | -   |
| 1,2-Dichloropropane                                | 78-87-5      | NE             | NE                 | 0.032 U      |   | 0.032 U     |   | 0.032 U     |   | 0.032 U     |   | -   |
| 1,3,5-Trimethylbenzene                             | 108-67-8     | 60             | 210.24             | 0.17 U       |   | <b>2.3</b>  |   | <b>2.3</b>  |   | 0.17 U      |   | 0%  |
| 1,3-Butadiene                                      | 106-99-0     | NE             | NE                 | 0.077 U      |   | 0.077 U     |   | 0.077 U     |   | 0.077 U     |   | -   |
| 1,3-Dichlorobenzene                                | 541-73-1     | NE             | NE                 | 0.21 U       |   | 0.21 U      |   | 0.21 U      |   | 0.21 U      |   | -   |
| 1,4-Dichlorobenzene                                | 106-46-7     | NE             | NE                 | 0.21 U       |   | 0.21 U      |   | 0.21 U      |   | 0.21 U      |   | -   |
| 1,4-Dioxane                                        | 123-91-1     | NE             | NE                 | 1.3 U        |   | 1.3 U       |   | 1.3 U       |   | 1.3 U       |   | -   |
| 2-Butanone (MEK)                                   | 78-93-3      | NE             | NE                 | 4.1 U        |   | <b>4.8</b>  |   | <b>4.4</b>  |   | 4.1 U       |   | 9%  |
| 2-Hexanone (MBK)                                   | 591-78-6     | NE             | NE                 | 0.29 U       |   | 0.29 U      |   | 0.29 U      |   | 0.29 U      |   | -   |
| 4-Ethyltoluene                                     | 622-96-8     | NE             | NE                 | 0.17 U       |   | 0.17 U      |   | 0.17 U      |   | 0.17 U      |   | -   |
| 4-Methyl-2-pentanone (MIBK)                        | 108-10-1     | NE             | NE                 | 0.14 U       |   | 0.14 U      |   | 0.14 U      |   | 0.14 U      |   | -   |
| Acetone                                            | 67-64-1      | NE             | NE                 | <b>8.2</b>   |   | <b>130</b>  |   | <b>110</b>  |   | <b>9.3</b>  |   | 17% |
| Benzene                                            | 71-43-2      | 0.13           | 1.05               | <b>0.24</b>  |   | 0.11 U      |   | <b>0.39</b> |   | <b>0.40</b> |   | -   |
| Benzyl chloride                                    | 100-44-7     | NE             | NE                 | 0.18 U       |   | 0.18 U      |   | 0.18 U      |   | 0.18 U      |   | -   |
| Bromodichloromethane                               | 75-27-4      | NE             | NE                 | 0.047 U      |   | 0.047 U     |   | 0.047 U     |   | 0.047 U     |   | -   |
| Bromoform                                          | 75-25-2      | NE             | NE                 | 0.36 U       |   | 0.36 U      |   | 0.36 U      |   | 0.36 U      |   | -   |
| Bromomethane                                       | 74-83-9      | NE             | NE                 | 0.14 U       |   | 0.14 U      |   | 0.14 U      |   | 0.14 U      |   | -   |
| Carbon Disulfide                                   | 75-15-0      | NE             | NE                 | 1.1 U        |   | 1.1 U       |   | 1.1 U       |   | 1.1 U       |   | -   |
| Carbon Tetrachloride                               | 56-23-5      | 0.17           | 1.36               | <b>0.53</b>  |   | <b>0.52</b> |   | <b>0.54</b> |   | <b>0.52</b> |   | 4%  |
| Chlorobenzene                                      | 108-90-7     | NE             | NE                 | 0.16 U       |   | 0.16 U      |   | 0.16 U      |   | 0.16 U      |   | -   |
| Chloroethane                                       | 75-00-3      | 10,000         | 35,040             | 0.092 U      |   | 0.092 U     |   | 0.092 U     |   | 0.092 U     |   | -   |
| Chloroform                                         | 67-66-3      | 0.04           | 0.36               | <b>0.099</b> |   | 0.034 U     |   | <b>0.25</b> |   | 0.034 U     |   | -   |
| Chloromethane                                      | 74-87-3      | NE             | NE                 | 0.14 U       |   | 0.14 U      |   | 0.14 U      |   | 0.14 U      |   | -   |
| cis-1,2-Dichloroethylene                           | 156-59-2     | NE             | NE                 | 0.028 U      |   | 0.028 U     |   | 0.028 U     |   | 0.028 U     |   | -   |
| cis-1,3-Dichloropropene                            | 10061-01-5   | NE             | NE                 | 0.032 U      |   | 0.032 U     |   | 0.032 U     |   | 0.032 U     |   | -   |
| Cyclohexane                                        | 110-82-7     | NE             | NE                 | 0.12 U       |   | 0.12 U      |   | 0.12 U      |   | 0.12 U      |   | -   |
| Dibromochloromethane                               | 124-48-1     | NE             | NE                 | 0.30 U       |   | 0.30 U      |   | 0.30 U      |   | 0.30 U      |   | -   |
| Dichlorodifluoromethane (Freon 12)                 | 75-71-8      | NE             | NE                 | <b>2.2</b>   |   | <b>2.0</b>  |   | 0.17 U      |   | <b>2.0</b>  |   | -   |
| Ethanol                                            | 64-17-5      | NE             | NE                 | <b>20</b>    |   | <b>34</b>   |   | <b>41</b>   |   | <b>16</b>   |   | 19% |
| Ethyl Acetate                                      | 141-78-6     | NE             | NE                 | 1.3 U        |   | 1.3 U       |   | 1.3 U       |   | 1.3 U       |   | -   |
| Ethylbenzene                                       | 100-41-4     | 0.4            | 3.27               | 0.15 U       |   | <b>1.3</b>  |   | <b>1.3</b>  |   | 0.15 U      |   | 0%  |
| Heptane                                            | 142-82-5     | NE             | NE                 | 0.14 U       |   | <b>0.89</b> |   | 0.14 U      |   | 0.14 U      |   | -   |
| Hexachlorobutadiene                                | 87-68-3      | NE             | NE                 | 0.37 U       |   | 0.37 U      |   | 0.37 U      |   | 0.37 U      |   | -   |
| Hexane                                             | 110-54-3     | NE             | NE                 | 4.9 U        |   | 4.9 U       |   | 4.9 U       |   | 4.9 U       |   | -   |
| Isopropanol                                        | 67-63-0      | NE             | NE                 | 3.4 U        |   | <b>9.0</b>  |   | <b>8.3</b>  |   | 3.4 U       |   | 8%  |
| m&p-Xylene                                         | 1330-20-7P/M | NE             | NE                 | 0.300 U      |   | <b>2.6</b>  |   | <b>2.7</b>  |   | <b>0.38</b> |   | 4%  |
| Methyl tert-Butyl Ether (MTBE)                     | 1634-04-4    | NE             | NE                 | 0.13 U       |   | 0.13 U      |   | 0.13 U      |   | 0.13 U      |   | -   |
| Methylene Chloride                                 | 75-09-2      | 60.34          | 817.6              | <b>2.7</b>   |   | <b>21</b>   |   | 1.2 U       |   | <b>18</b>   |   | -   |
| Naphthalene                                        | 91-20-3      | 0.262          | 0.262              | 0.18 U       |   | <b>0.49</b> |   | <b>0.52</b> |   | <b>0.30</b> |   | 6%  |
| o-Xylene                                           | 95-47-6      | NE             | NE                 | 0.15 U       |   | <b>1.2</b>  |   | <b>1.3</b>  |   | <b>0.18</b> |   | 8%  |
| Propene                                            | 115-07-1     | NE             | NE                 | 2.4 U        |   | 2.4 U       |   | 2.4 U       |   | 2.4 U       |   | -   |
| Styrene                                            | 100-42-5     | NE             | NE                 | 0.15 U       |   | <b>0.42</b> |   | <b>0.43</b> |   | 0.15 U      |   | 2%  |
| Tetrachloroethylene                                | 127-18-4     | 0.63           | 5.11               | 0.24 U       |   | <b>13</b>   |   | <b>14</b>   |   | 0.24 U      |   | 7%  |
| Tetrahydrofuran                                    | 109-99-9     | NE             | NE                 | 1.0 U        |   | 1.0 U       |   | 1.0 U       |   | 1.0 U       |   | -   |
| Toluene                                            | 108-88-3     | NE             | NE                 | <b>0.37</b>  |   | <b>2.1</b>  |   | <b>1.9</b>  |   | <b>0.97</b> |   | 10% |
| Total Trimethylbenzene                             | 25551-13-7   | 60             | 210.24             | 0.26 U       |   | <b>11.2</b> |   | <b>11.4</b> |   | <b>0.42</b> |   | 2%  |
| Total Xylene                                       | 1330-20-7    | NE             | NE                 | 0.15 U       |   | <b>3.8</b>  |   | <b>4.0</b>  |   | <b>0.56</b> |   | 5%  |
| trans-1,2-Dichloroethylene                         | 156-60-5     | NE             | NE                 | 0.028 U      |   | 0.028 U     |   | 0.028 U     |   | 0.028 U     |   | -   |
| trans-1,3-Dichloropropene                          | 10061-02-6   | NE             | NE                 | 0.032 U      |   | 0.032 U     |   | 0.032 U     |   | 0.032 U     |   | -   |
| Trichloroethylene                                  | 79-01-6      | 0.20           | 0.70               | 0.037 U      |   | 0.037 U     |   | 0.037 U     |   | <b>0.19</b> |   | -   |
| Trichlorofluoromethane (Freon 11)                  | 75-69-4      | NE             | NE                 | <b>1.2</b>   |   | <b>1.2</b>  |   | <b>1.3</b>  |   | <b>1.4</b>  |   | 8%  |
| Vinyl Acetate                                      | 108-05-4     | NE             | NE                 | 2.50 U       |   | 2.50 U      |   | 2.50 U      |   | 2.50 U      |   | -   |
| Vinyl Chloride                                     | 75-01-4      | 0.11           | 1.86               | 0.018 U      |   | 0.018 U     |   | 0.018 U     |   | 0.018 U     |   | -   |

Key:

Indoor Air Standards (IAS) from Investigation and Remediation of Contaminated Properties Rule, July 2015  
µg/m³ - micrograms per cubic meter

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedance of the resident IAS

Orange border indicates an exceedance of the non-resident IAS

NE - screening level not established

Q - laboratory result qualifier

U - Analyte not detected; limit of quantitation listed

Table B-15  
TCLP Pesticides and Herbicides Results - Soil Samples

| Sample ID          |            | Maximum<br>Concentration of<br>Contaminants for<br>Toxicity Characteristic | SL-3     |   | SL-4     |   |
|--------------------|------------|----------------------------------------------------------------------------|----------|---|----------|---|
| Sample Date        |            | (µg/l)                                                                     | 3/1/2022 | Q | 3/1/2022 | Q |
|                    | CAS #      |                                                                            |          |   |          |   |
| 4,4' -DDD          | 72-54-8    | NE                                                                         | 1.0 U    |   | 1.0 U    |   |
| 4,4' -DDE          | 72-55-9    | NE                                                                         | 1.0 U    |   | 1.0 U    |   |
| 4,4' -DDT          | 50-29-3    | NE                                                                         | 1.0 U    |   | 1.0 U    |   |
| a-BHC              | 319-84-6   | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Alachlor           | 15972-60-8 | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Aldrin             | 309-00-2   | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| b-BHC              | 319-85-7   | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Chlordane          | 57-74-9    | NE                                                                         | 5.0 U    |   | 5.0 U    |   |
| d-BHC              | 319-86-8   | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Dieldrin           | 60-57-1    | NE                                                                         | 1.0 U    |   | 1.0 U    |   |
| Endosulfan I       | 959-98-8   | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Endosulfan II      | 33213-65-9 | NE                                                                         | 1.0 U    |   | 1.0 U    |   |
| Endosulfan Sulfate | 1031-07-8  | NE                                                                         | 1.0 U    |   | 1.0 U    |   |
| Endrin             | 72-20-8    | NE                                                                         | 1.0 U    |   | 1.0 U    |   |
| Endrin Aldehyde    | 7421-93-4  | NE                                                                         | 1.0 U    |   | 1.0 U    |   |
| g-BHC (Lindane)    | 58-89-9    | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Heptachlor         | 76-44-8    | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Heptachlor epoxide | 1024-57-3  | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Methoxychlor       | 72-43-5    | NE                                                                         | 0.50 U   |   | 0.50 U   |   |
| Toxaphene          | 8001-35-2  | NE                                                                         | 20 U     |   | 20 U     |   |
| 2,4,5-TP (Silvex)  | 93-72-1    | NE                                                                         | 50 U     |   | 50 U     |   |
| 2,4-D              | 94-75-7    | 10                                                                         | 100 U    |   | 100 U    |   |

Key:

µg/L - micrograms per liter (parts per billion)

Q - qualifier

U - Analyte not detected, laboratory reporting limit provided

NE - not established

Table B-16  
TCLP Metals Analytical Results - Soil Samples

| Sample ID     |           | Maximum Concentration<br>of Contaminants for<br>Toxicity Characteristic | SL-3        |   | SL-4        |   |
|---------------|-----------|-------------------------------------------------------------------------|-------------|---|-------------|---|
| Sample Date   |           |                                                                         | 3/1/2022    | Q | 3/1/2022    | Q |
|               | CAS #     | mg/l                                                                    |             |   |             |   |
| TCLP Arsenic  | 7440-38-2 | 5.0                                                                     | 0.10 U      |   | 0.10 U      |   |
| TCLP Barium   | 7440-39-3 | 100                                                                     | <b>0.50</b> |   | <b>0.29</b> |   |
| TCLP Cadmium  | 7440-43-9 | 1.0                                                                     | 0.050 U     |   | 0.050 U     |   |
| TCLP Chromium | 7440-47-3 | 5.0                                                                     | 0.10 U      |   | 0.10 U      |   |
| TCLP Lead     | 7439-92-1 | 5.0                                                                     | 0.10 U      |   | 0.10 U      |   |
| TCLP Silver   | 7440-22-4 | 5.0                                                                     | 0.10 U      |   | 0.10 U      |   |
| TCLP Selenium | 7782-49-2 | 1.0                                                                     | 0.10 U      |   | 0.10 U      |   |
| TCLP Mercury  | 7439-97-6 | 0.2                                                                     | 0.00020 U   |   | 0.00020 U   |   |

Key:

mg/L - milligrams per liter (parts per million)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedance of the residential enforcement standard(s)

NE - screening level not established

Q - qualifier

U - Analyte not detected, laboratory reporting limit provided

Table B-17  
TCLP Semi Volatile Organic Compounds Analytical Results - Soil Samples

| Sample ID<br>Sample Date      | CAS#         | Maximum Concentration of<br>Contaminants for Toxicity<br>Characterisitic<br>(µg/l) | SL-3<br>3/1/2022 |   | SL-4<br>3/1/2022 |   |
|-------------------------------|--------------|------------------------------------------------------------------------------------|------------------|---|------------------|---|
|                               |              |                                                                                    | Q                |   | Q                |   |
| 1,4-Dichlorobenzene           | 106-46-7     | 7,500                                                                              | 83               | U | 83               | U |
| 2,4,5-Trichlorophenol         | 95-95-4      | 400,000                                                                            | 83               | U | 83               | U |
| 2,4,6-Trichlorophenol         | 88-06-2      | 2,000                                                                              | 83               | U | 83               | U |
| 2,4-Dinitrotoluene            | 121-14-2     | 130                                                                                | 83               | U | 83               | U |
| 2-Methylphenol (o-cresol)     | 95-48-7      | 200,000                                                                            | 83               | U | 83               | U |
| 3&4-Methylphenol (m&p-Cresol) | PHNX - M&P C | 200,000                                                                            | 83               | U | 83               | U |
| Hexachlorobenzene             | 118-74-1     | 130                                                                                | 83               | U | 83               | U |
| Hexachlorobutadiene           | 87-68-3      | 500                                                                                | 83               | U | 83               | U |
| Hexachloroethane              | 67-72-1      | 3,000                                                                              | 83               | U | 83               | U |
| Nitrobenzene                  | 98-95-3      | 2,000                                                                              | 83               | U | 83               | U |
| Pentachlorophenol             | 87-86-5      | 100,000                                                                            | 83               | U | 83               | U |
| Pyridine                      | 110-86-1     | 5,000                                                                              | 83               | U | 83               | U |

Key:

µg/L - micrograms per liter (parts per billion)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedance of the residential enforcement standard(s)

NE - screening level not established

Q - qualifier

U - Analyte not detected, laboratory reporting limit provided

Table B-18  
TCLP Volatile Organic Compounds Analytical Results - Soil Samples

| Sample ID<br>Sample Date | CAS#     | Maximum Concentration of<br>Contaminants for Toxicity<br>Characterisitic<br>(µg/l) | SL-3<br>3/1/2022 |   | SL-4<br>3/1/2022 |   |
|--------------------------|----------|------------------------------------------------------------------------------------|------------------|---|------------------|---|
|                          |          |                                                                                    | Q                |   | Q                |   |
| 1,1-Dichloroethene       | 75-35-4  | 7,000                                                                              | 50               | U | 50               | U |
| 1,2-Dichloroethane       | 107-06-2 | 5,000                                                                              | 50               | U | 50               | U |
| Benzene                  | 71-43-2  | 500                                                                                | 50               | U | 50               | U |
| Carbon tetrachloride     | 56-23-5  | 500                                                                                | 50               | U | 50               | U |
| Chlorobenzene            | 108-90-7 | 100,000                                                                            | 50               | U | 50               | U |
| Chloroform               | 67-66-3  | 6,000                                                                              | 50               | U | 50               | U |
| Methyl ethyl ketone      | 78-93-3  | 200,000                                                                            | 50               | U | 50               | U |
| Tetrachloroethene        | 127-18-4 | 700                                                                                | 50               | U | 50               | U |
| Trichloroethene          | 79-01-6  | 500                                                                                | 50               | U | 50               | U |
| Vinyl chloride           | 75-01-4  | 200                                                                                | 50               | U | 50               | U |

Key:

µg/L - micrograms per liter (parts per billion)

**Bold** results indicate detections of the analyte

Shaded results indicate an exceedance of the residential enforcement standard(s)

NE - screening level not established

Q - qualifier

U - Analyte not detected, laboratory reporting limit provided

Table B-19  
Waste Characteristics – Soil Samples

| Sample ID          | SL-3      | SL-4      |
|--------------------|-----------|-----------|
| Sample Date        | 3/1/2022  | 3/1/2022  |
| Flash Point        | >200°F    | >200°F    |
| pH at 25C - Soil   | 7.95      | 7.96      |
| Percent Solid      | 78%       | 83%       |
| Corrosivity        | Negative  | Negative  |
| Ignitability       | Passed    | Passed    |
| Reactivity Cyanide | <6 mg/Kg  | <6 mg/Kg  |
| Reactivity Sulfide | <20 mg/Kg | <20 mg/Kg |
| Reactivity         | Negative  | Negative  |
| Free Liquids       | <2 mL     | <2 mL     |

Key:

mg/kg - milligrams per kilogram (parts per million)

°F - degrees Fahrenheit

mL - milliliter

Table B-20  
Indoor Air Sample Analytical Results

| Sample ID    | Sample Date | CAS#       | VT RAL - PCBs in Indoor Air |  | IA-PCB-01 |   | IA-PCB-02 |   | IA-PCB-03 |   | IA-PCB-04 |   | IA-PCB-05 |   |
|--------------|-------------|------------|-----------------------------|--|-----------|---|-----------|---|-----------|---|-----------|---|-----------|---|
|              |             |            |                             |  | 2/24/2022 | Q | 2/24/2022 | Q | 2/24/2022 | Q | 2/24/2022 | Q | 2/24/2022 | Q |
|              |             |            | (ng/m³)                     |  |           |   |           |   |           |   |           |   |           |   |
| Aroclor-1016 |             | 12674-11-2 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1221 |             | 11104-28-2 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1232 |             | 11141-16-5 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1242 |             | 53469-21-9 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1248 |             | 12672-29-6 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1254 |             | 11097-69-1 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1260 |             | 11096-82-5 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1262 |             | 37324-23-5 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1268 |             | 11100-14-4 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |
| Total PCBs   |             | 1336-36-3  | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U | 7.9       | U |

| Sample ID    | Sample Date | CAS#       | VT RAL - PCBs in Indoor Air |  | IA-PCB-06 |   | IA-PCB-07 |   | OA-PCB-08 |   |
|--------------|-------------|------------|-----------------------------|--|-----------|---|-----------|---|-----------|---|
|              |             |            |                             |  | 2/24/2022 | Q | 2/24/2022 | Q | 2/24/2022 | Q |
|              |             |            | (ng/m³)                     |  |           |   |           |   |           |   |
| Aroclor-1016 |             | 12674-11-2 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1221 |             | 11104-28-2 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1232 |             | 11141-16-5 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1242 |             | 53469-21-9 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1248 |             | 12672-29-6 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1254 |             | 11097-69-1 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1260 |             | 11096-82-5 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1262 |             | 37324-23-5 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Aroclor-1268 |             | 11100-14-4 | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |
| Total PCBs   |             | 1336-36-3  | 22.5                        |  | 7.9       | U | 7.9       | U | 7.9       | U |

Key:

VT RAL - Vermont Department of Environmental Conservation Remedial Action Level for residential and commercial buildings (March 11, 2022)

ng/m³ - nanograms per cubic meter

Q - laboratory result qualifier

U - Analyte not detected; limit of quantitation listed

---

## Appendix C: Detailed Cost Estimate

---

**202 Bay Street CAP Implementation**  
**Stone Project #: 20-117**  
**DETAILED FEE & SCOPE DETAILS**

| #                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | Staff Type | Rate Per Unit | Unit | Amount | Subtotal | Scope Details                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |
|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------|---------------|------|--------|----------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>1 Task 1 - Project Management</b><br><b>Professional Services</b><br>Senior Professional 1 \$ 141 / hour 60 \$8,460<br><i>Professional Services Summary</i> 60 \$8,460<br><br><b>Stone Equipment</b><br>Civic Mileage \$ 0.585 / mile 320 \$187<br><i>Expense Summary</i> \$187<br><br><b>TASK SUBTOTAL</b> \$8,647                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  |            |               |      |        |          | Senior Scientist:<br>1) attend bi-weekly project team meetings for duration of cleanup project (1 hour/meeting for six months (12 meetings).<br>2) coordinate SSD system installation and soil management with general contractor (20 hours)<br>3) Project tracking (2 hours/month for 6 months)<br>4) Up to four site meetings with owner and contractors (4 hours/meeting, including travel)                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              |
| <b>2 Task 2 - SSD System Installation &amp; Startup</b><br><b>Professional Services</b><br>Staff Professional 3 104 / hour 42 \$4,368<br><i>Professional Services Summary</i> 42 \$4,368<br><br><b>Consultants*</b><br>SSD System Install Labor \$65 / hour 48 \$3,432<br>Electrician Contractor \$1,500 / ls 1 \$1,650<br>Roofing Contractor \$3,000 / ls 1 \$3,300<br>Influent Samples: VOCs by TO-15 \$275 / sample 2 \$605<br>Indoor Air Samples: VOCs by TO-15 \$275 / sample 4 \$1,210<br><i>Consultant Summary</i> \$10,197<br><br><b>External Expenses</b><br>PVC Pipe and Fittings \$1,200 / ls 1 \$1,320<br>Pipe Mounting Hardware \$250 / ls 1 \$275<br>SSD System Fan \$200 / ea 2 \$440<br>Extraction Well Materials \$25 / ea 4 \$110<br>Magnehelic Gauge \$125 / ea 2 \$275<br>Fan Failure Alarm \$150 / ea 2 \$330<br>Shipping/Freight \$100 / ea 1 \$110<br>Monitoring Points \$100 / ea 6 \$660<br><br><b>Stone Equipment</b><br>F-150 Usage Fee \$125 / Daily 5 \$625<br>Bosch Hammer Drill \$50 / Daily 1 \$50<br>Omnigaurd Differential Pressure Reco \$50 / Daily 2 \$100<br>PID \$90 / Daily 2 \$180<br>TSI Velocicalc 9535 Anemometer \$35 / Daily 2 \$70<br>EG&G Rotron Blower \$70 / Daily 2 \$140<br><br><b>Stone Consumables</b><br>PPE \$19.50 / Day/Staff 0 \$0.00<br><i>Expense Summary</i> \$4,685<br><br><b>TASK SUBTOTAL</b> \$19,250 |            |               |      |        |          | Staff scientist to oversee SSD system installation to document compliance with CAP. Perform SSD system performance monitoring following extraction well construction and upon startup. Collect two SSD system influent air samples upon startup.<br><br><u>Contractor Labor:</u><br>1) Assumes three days for two laborers to construct SSD system.<br>2) Electrician to provide electrical supply to each SSD system fan from dedicated breaker.<br>3) Roofer to install flashing/roof vent boot for each SSD system as appropriate.<br><br>Stone Labor:<br>Staff scientist<br>1) provide SSD system oversight and perform interim performance testing following extraction well installation (30 hours including travel)<br>2) field preparation - 4 hours<br>3) perform startup performance testing - 8 hours<br>4) collect two indoor air samples, one field duplicate, and one outdoor ambient air sample following completion of building renovations |
| <b>3 Task 3 - SSD System Monitoring - (1 Year Quarterly 2 years Annual)</b><br><b>Professional Services</b><br>Staff Professional 3 \$ 104 / hour 48 \$4,992<br>Senior Professional 1 \$ 141 / hour 2 \$282<br><i>Professional Services Summary</i> 50 \$5,274<br><br><b>Consultants*</b><br>Soil Vapor Samples: VOCs by TO-15 \$200 / sample 12 \$2,640<br><i>Consultant Summary</i> \$2,640<br><br><b>External Expenses</b><br>Shipping/Freight \$100.0 / ea 5 \$550<br><br><b>Stone Equipment</b><br>F-150 Usage Fee \$125 / Daily 5 \$625<br>Omnigaurd Differential Pressure Reco \$50 / Daily 5 \$250<br>PID \$90 / Daily 5 \$450<br>TSI Velocicalc 9535 Anemometer \$35 / Daily 5 \$175<br><br><b>Stone Consumables</b><br>PPE \$19.50 / Day/Staff 5 \$97.50<br><i>Expense Summary</i> \$2,148<br><br><b>TASK SUBTOTAL</b> \$10,062                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               |            |               |      |        |          | Conduct quarterly monitoring for one year following SSD system installation. Startup monitoring will serve as the first event. Measure differential pressure between sub-slab and indoor air environments and airflow, vacuum, and relative VOC levels in SSD system influent pipes. Inspect mechanical components for need or repair/replacement. Collect one sub-slab soil vapor sample (+ 1 field duplicate/event) for VOC analysis by TO-15. Operate SSD system passively for two years and collect sub-slab soil vapor samples from MP-5 annually (+1 FD/event)<br><br>Staff Scientist: Staff Scientist 8 hours/event - 5 events total<br><br>Prepare monitoring report<br>Staff scientist: 8 hours<br>Senior Review: 2 hours                                                                                                                                                                                                                          |

|                                                             |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
|-------------------------------------------------------------|---------------------|------------|----------|-----------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 4 Task 4 - Soil Management                                  |                     |            |          |           | Senior Professional to coordinate soil disposal with Waste USA landfill in Coventry, VT (12 hours)<br><br>Staff professional to provide oversight of contaminated and development soils - assumes work will take two weeks, 8 hours/day including travel |                                                                                                                                                                  |
| Professional Services                                       |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Staff Professional 3                                        | \$                  | 104 / hour | 80       | \$8,320   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Senior Professional 1                                       | \$                  | 141 / hour | 12       | \$1,692   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Professional Services Summary                               |                     |            | 92       | \$10,012  |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Consultants*                                                |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Exc. Contractor Mobilization                                | \$2,500 / ls        | 1          | \$2,750  |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Excavate/Load Disposal Soils                                | \$15.68 / CY        | 178        | \$3,070  |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Excavate/Load Development Soils                             | \$15.68 / CY        | 700        | \$12,074 |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Transport/Disposal of Disposal soils                        | \$80 / ton          | 268        | \$23,584 |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Transport/Disposal of Development sc                        | \$65 / ton          | 1050       | \$75,075 |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Waste Characterisitics Samples                              | \$750 / each        | 4          | \$3,300  |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Cleanup Verification Samples - PAHs                         | \$90 / each         | 5          | \$495    |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Cleanup Verification Samples - Metals                       | \$95 / each         | 5          | \$523    |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Cleanup Verification Samples - TPH                          | \$60 / each         | 2          | \$132    |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Consultant Summary                                          |                     |            |          | \$121,002 |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| External Expenses                                           |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Shipping/Freight                                            | \$100 / ea          | 2          | \$220    |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Stone Equipment                                             |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| F-150 Usage Fee                                             | \$125 / Daily       | 10         | \$1,250  |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Stone Consumables                                           |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| PPE                                                         | \$19.50 / Day/Staff | 10         | \$195.00 |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Expense Summary                                             |                     |            |          | \$1,665   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| TASK SUBTOTAL                                               |                     |            |          | \$132,679 |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| 5 Task 5 - Container Disposal                               |                     |            |          |           |                                                                                                                                                                                                                                                          | Absolute Spill Response to inventory, characterize, and transport universal wastes off-Site for proper disposal. Stone to provide oversight/document activities. |
| Professional Services                                       |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Staff Professional 3                                        | \$                  | 104 / hour | 16       | \$1,664   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Professional Services Summary                               |                     |            | 16       | \$1,664   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Consultants*                                                |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Absolute Spill Reponse                                      | \$20,000 / ls       | 1          | \$22,000 |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Consultant Summary                                          |                     |            |          | \$22,000  |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Stone Equipment                                             |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| F-150 Usage Fee                                             | \$125 / Daily       | 2          | \$250    |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Stone Consumables                                           |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| PPE                                                         | \$19.50 / Day/Staff | 2          | \$39.00  |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Expense Summary                                             |                     |            |          | \$289     |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| TASK SUBTOTAL                                               |                     |            |          | \$23,953  |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| 6 Task 6 - Floor Drain Closure                              |                     |            |          |           | Absolute Spill Response to remove sludge from floor drain system with drum vacuum, clean floor drain/pit, and backfill with flowable fill. Work to be completed under QEP supervision.                                                                   |                                                                                                                                                                  |
| Professional Services                                       |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Staff Professional 3                                        | \$                  | 104 / hour | 8        | \$832     |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Professional Services Summary                               |                     |            | 8        | \$832     |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Consultants*                                                |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Absolute Spill Response                                     | \$5,000 / ls        | 1          | \$5,500  |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Consultant Summary                                          |                     |            |          | \$5,500   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Stone Equipment                                             |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| F-150 Usage Fee                                             | \$125 / Daily       | 1          | \$125    |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Stone Consumables                                           |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| PPE                                                         | \$19.50 / Day/Staff | 1          | \$19.50  |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Expense Summary                                             |                     |            |          | \$145     |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| TASK SUBTOTAL                                               |                     |            |          | \$6,477   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| 7 Task 7 - Corrective Action Construction Completion Report |                     |            |          |           |                                                                                                                                                                                                                                                          | Prepare CACCR in accordance with IRule following completion of cleanup activities.                                                                               |
| Professional Services                                       |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Senior Professional 1                                       | \$                  | 141 / hour | 8        | \$1,128   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Project Engineer 3                                          | \$                  | 136 / hour | 4        | \$544     |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Staff Professional 3                                        | \$                  | 104 / hour | 32       | \$3,328   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Professional Services Summary                               |                     |            | 44       | \$5,000   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Stone Equipment                                             |                     |            |          |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| AutoCAD Civil 3D                                            | \$10.00 / Hour      | 16         | \$160.00 |           |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| Expense Summary                                             |                     |            |          | \$160     |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| TASK SUBTOTAL                                               |                     |            |          | \$5,160   |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| PROJECT TOTAL                                               |                     |            |          | \$206,227 |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |
| PROJECT TOTAL (20% Contingency)                             |                     |            |          | \$247,473 |                                                                                                                                                                                                                                                          |                                                                                                                                                                  |

Stone Environmental's standard mark-up on all Consultant and reimbursable project expenses is 10%.

---

## Appendix D: SSD System Operations and Maintenance Plan

---

**Operations and Maintenance Plan: 202  
Bay Street, St. Johnsbury, Vermont  
Sub-Slab Depressurization Systems**

**SMS #20204966**



**PROJECT NO.**

**17-117**

**PREPARED FOR:**

**Brandon McFarlane/ Owner, CEO  
Zion Growers**

**REVIEWED BY:**

**74 Mountain Avenue / St. Johnsbury, Vermont  
05819**

**SUBMITTED BY:**

**Lee Rosberg / Senior Geologist  
Stone Environmental, Inc.  
535 Stone Cutters Way  
Montpelier / VT 05602  
[lrosberg@stone-env.com](mailto:lrosberg@stone-env.com)  
802.229.5378**

---

# Operations and Maintenance Plan: 202 Bay Street, St. Johnsbury, Vermont Sub-Slab Depressurization Systems

---

## Contents

|                                                            |    |
|------------------------------------------------------------|----|
| 1. Introduction.....                                       | 3  |
| 2. SSD System Operations and Maintenance Requirements..... | 4  |
| 2.1. SSD System Overview.....                              | 4  |
| 2.2. Specific System Components .....                      | 5  |
| 2.3. System Operation.....                                 | 5  |
| 2.4. Performance Objectives.....                           | 5  |
| 2.5. System Troubleshooting.....                           | 6  |
| 2.6. Emergency Contact Information .....                   | 6  |
| 2.7. Periodic System Inspections .....                     | 6  |
| 2.8. Long Term System Maintenance .....                    | 6  |
| 3. Reporting Requirements.....                             | 7  |
| 3.1. Modifications to the OMP.....                         | 7  |
| 4. List of Acronyms.....                                   | 8  |
| Appendix A: Figures.....                                   | 9  |
| Appendix B: SSD Systems Component Manuals .....            | 10 |
| Appendix C: Operations and Monitoring Forms.....           | 11 |

---

# 1. Introduction

---

Stone Environmental, Inc. (Stone) has prepared this Operations and Maintenance Plan (OMP) on behalf of Zion Growers for their property located at 202 Bay Street, St. Johnsbury, Vermont (the Site; Figure 1). Historical Site operations have resulted in vapor intrusion of the volatile organic compounds (VOCs), naphthalene, into a Site building referred to as the “L” building from sub-slab soil vapors. This OMP outlines maintenance and compliance monitoring requirements for proposed sub-slab depressurization (SSD) systems that will be installed in the “L” building. The purpose of the SSD systems is to mitigate vapor intrusion (VI) into the Site building. For additional details concerning subsurface contamination at the Site please refer to the CAP:

- Stone Environmental, Inc., *Partial Corrective Action Plan: 202 Bay Street, St. Johnsbury, Vermont, SMS #20204966*, April 19, 2022.

For the most up to date information regarding subsurface contamination at the Site, please contact the Vermont Department of Environmental Conservation (VT DEC). The current VT DEC site manager is Ms. Kimberly Caldwell (as of the production date for this document).

---

## 2. SSD System Operations and Maintenance Requirements

---

### 2.1. SSD System Overview

The SSD systems operate by inducing a negative pressure beneath the “L” building’s concrete slab relative to indoor air. Air drawn from the subsurface by the fans is exhausted to the outdoors above the building roofline, which is located more than ten feet away from air intake structures and windows. Figures 2 and 3 (Appendix A) provide SSD system layout and component details.

The SSD systems installed beneath the building slab consists of six basic components:

1. **Extraction Wells:** Extraction wells will be constructed by using a concrete core drill with a 6-inch diameter coring bit to core through the building slab and foundation wall, hand excavating approximately 1-foot of soil, backfilling the excavation to the base of the slab/foundation wall using 1-inch minus diameter washed stone, inserting 4-inch diameter schedule 40 polyvinyl chloride (PVC) pipe into the core hole, and sealing the PVC pipe to the slab using hydraulic cement. Four extraction wells will be installed during construction of the SSD systems (EW-1, -2, -3, and -4).
2. **Ventilation Piping:** Ventilation piping will consist of 4-inch diameter schedule 40 PVC pipe solvent welded together and to each extraction well. Couplings, elbows, and other fittings will be used as appropriate to connect piping emanating from each extraction well in the SSD systems. Monitoring ports will be installed at chest height within PVC piping above each extraction well to allow for air flow and vacuum measurements. Monitoring ports will consist of 3/8-inch threaded holes in the PVC pipe and will be plugged with a stainless-steel hex drive cap and O-ring while the system is in use. Gate valves will be installed approximately 8-feet above each extraction well and in-line with effluent piping to allow for balancing flow between extraction wells within each SSD system, if required. Ventilation piping for the SSD system will be plumbed together within the building, exiting the building and extending above the roof-line.
3. **Fan Unit:** The fan used to induce a negative pressure in the sub-slab environment will be installed in-line with ventilation piping outside of the Site building.
4. **Pressure Gauge:** A magnehelic® pressure gauge will be installed as part of each SSD system to monitor differential pressure between the SSD systems and building interior. One quarter inch polyethylene tubing will be connected to each magnehelic® gauge and installed in effluent piping prior to PVC pipe exiting the building, but at a location after where the effluent piping from all extraction wells for each SSD system is plumbed together.
5. **Sub-Slab Monitoring Points:** Six differential pressure monitoring points will be installed in the “L” building slab to confirm the effectiveness of the SSD systems. Differential pressure vapor monitoring points will consist of Cox-Colvin Vapor Pins® installed through, and recessed within the concrete slab/foundation wall, and covered with flush-mount stainless steel covers.
6. **Fan Failure Alarm:** One fan failure alarm will be installed in each SSD system to measure the applied vacuum within ventilation piping prior to the piping exiting the building. If the applied

---

vacuum drops below -0.10 inches of water column (“WC”), a red light will flash and an alarm will sound.

## 2.2. Specific System Components

A summary of specific components included in each SSD system is provided below.

1. **Extraction Wells:**
  - a. 1-inch minus diameter washed stone to a depth of 1 foot below slab/foundation wall,
  - b. 4-inch diameter PVC piping, and
  - c. Hydraulic cement.
2. **Ventilation Piping:** 4-inch diameter schedule 40 PVC pipe and fittings.
3. **Blower Units:** RadonAway model GX4 radon fan with 120-volt power supply (or similar),
4. **Pressure Gauge:**
  - a. Dwyer Instruments series 2000 Magnehelic® differential pressure gauge with a 0 – 5 inches of water column (“WC”) range.
  - b. ¼-inch outside diameter polyethylene tubing.
5. **Sub-Slab Monitoring Points:** Stainless Steel Cox-Colvin Vapor Pins® recessed in concrete slab and capped with silicon caps and flush-mount stainless steel covers.
6. **Fan Failure Alarm:** RadonAway model RSA1 or similar.

Product manuals and manufacturer information for the RadonAway model GX4 radon fan, Dwyer Instruments Magnehelic® differential pressure gauge, and RadonAway model RSA1 fan failure alarm are provided as Appendix B.

## 2.3. System Operation

SSD systems are operated by powering on fan units. For power supply to fans and fan failure alarms, electrical circuit breakers will be labeled “Radon Fan” by the electrician subcontracted to install electrical components.

SSD systems must remain in operation at all times. The only conditions warranting the shutdown of SSD systems are as follows:

1. Emergencies (fire, flood, etc.)
2. System malfunction,
3. System maintenance/inspection (fan replacement, cleaning fan impellers, etc.); and
4. Deactivation approved by the VT DEC. SSD systems may be operated passively if influent samples do not contain VOCs at concentrations exceeding non-resident sub-slab soil gas Vapor Intrusion Standards, published in the VT DEC’s Investigation and Remediation of Contaminated Properties Rule for two consecutive years.

## 2.4. Performance Objectives

SSD systems are designed to:

1. Prevent migration of naphthalene contaminated soil gas into the “L” building at concentrations exceeding non-resident Vermont Indoor Air Standards (IAS). Non-resident IAS for naphthalene is 0.262 micrograms per cubic meter [ $\mu\text{g}/\text{m}^3$ ]. IAS are published in Appendix A - §35-APX-A2 of the Investigation and Remediation of Contaminated Properties Rule (VT DEC, 2019); and
2. Maintain a minimum differential pressure of -0.008 “WC” beneath the concrete slab, if operating actively.

---

## 2.5. System Troubleshooting

System troubleshooting is required if SSD fans fail, operates outside of the performance objectives discussed above, or if other system malfunctions are noted during periodic inspections. In the event of one of these situations, Zion Growers should contact Stone Environmental, Inc. at the phone numbers provided in Section 2.6. SSD system troubleshooting should only be performed by a qualified environmental professional or a professional engineer familiar with operation and maintenance (O&M) of SSD systems. SSD system troubleshooting may also require the retention of additional experts such as a licensed electrician, mechanical engineer, or others. Any such work will be completed under the supervision of a qualified environmental professional (QEP).

## 2.6. Emergency Contact Information

**Zion Growers:** 802-274-0613

Current Contact: Travis Samuels

**Stone Environmental, Inc.:** 802-229-5378

Current Contact: Lee Rosberg

**Vermont Department of Environmental Conservation:** 802-461-5857

Current Contact: Kimberly Caldwell

## 2.7. Periodic System Inspections

Quarterly O&M tasks will be completed by a QEP for the first year of system operation and include:

1. Pressure differential measurements between the sub-slab area and the indoor air to verify a minimum vacuum of -0.008 "WC is maintained. If appropriate, the QEP may adjust the gate valves in-line with extraction well ventilation piping to adjust applied vacuum and airflow rates within the SSD systems.
2. PID measurements will be collected from the exhaust vent to track relative levels of volatile organic compounds (VOC) in SSD system emissions.
3. Airflow and vacuum measurements within each extraction well ventilation piping.

The QEP will also assess each topside SSD system component to ensure they are functioning properly. These components include the fan, fan failure alarm, and Magnehelic® pressure gauge. Quarterly inspections are scheduled to begin three months following SSD system startup.

## 2.8. Long Term System Maintenance

After one year of SSD system operation, long term O&M activities will be carried out by Zion Growers personnel and include:

1. Quarterly inspection of the concrete slab and foundation walls for potential preferential VI pathways, such as cracks or other perforations. Any potential VI pathways should be sealed immediately with Sikaflex 1a elastomeric sealant or other appropriate sealant,
2. Quarterly inspection of all mechanical elements and performance of any necessary maintenance; and
3. Recording Magnehelic® pressure gauge readings on a quarterly basis to verify the fan is inducing a vacuum comparable to those observed during system startup.

O&M forms are provided as Appendix C.

---

## 3. Reporting Requirements

---

An O&M report will be prepared annually – due October 1 – during the first year of operation for review by the VT DEC Sites Management Section (SMS). An annual institutional control inspection form is provided in Appendix C. Salient to the SSD system, the property owner should complete the buildings/structures and sub-slab depressurization system sections of the inspection form and submit to the VT DEC Site Manager by October 1 of every year. In addition, the SMS must be notified immediately if a remedial system is shut down or not functioning properly. O&M reports will include the following information:

- A summary of the remedial system operation and Site status;
- Documentation of periodic concrete slab inspections for potential preferential VI pathways and a summary of any remedial actions taken;
- Documentation of mechanical elements inspections and a summary of any maintenance performed;
- A table of applied vacuums, as recorded quarterly from Magnehelic® gauges;
- Pressure differential measurements between the sub-slab area and the indoor air;
- PID measurements of SSD system exhaust streams; and
- Airflow and vacuum measurements within each extraction well ventilation piping.

All inspection forms, documentation of repairs to either the SSD system, and any other appropriate documentation, such as photographs, will be included as an attachment to the O&M report. An O&M report will be submitted for SMS review at least six weeks prior to any operational changes that may require SMS approval.

### 3.1. Modifications to the OMP

Any changes to the OMP will be incorporated as an addendum or as a complete revision to this document, as appropriate and will be submitted to the SMS for approval.

---

## 4. List of Acronyms

---

µg/m<sup>3</sup>: Micrograms per Cubic Meter

CFM: Cubic Feet per Minute

VOC: Volatile Organic Compound

O&M: Operations and Maintenance

OMP: Operations and Maintenance Plan

PCE: Tetrachloroethene

PVC: Poly-vinyl Chloride

QEP: Qualified Environmental Professional

SMS: Sites Management Section

SSD: Sub-Slab Depressurization

VI: Vapor Intrusion

VT DEC: Vermont Department of Environmental Conservation

"WC: Inches of Water Column

---

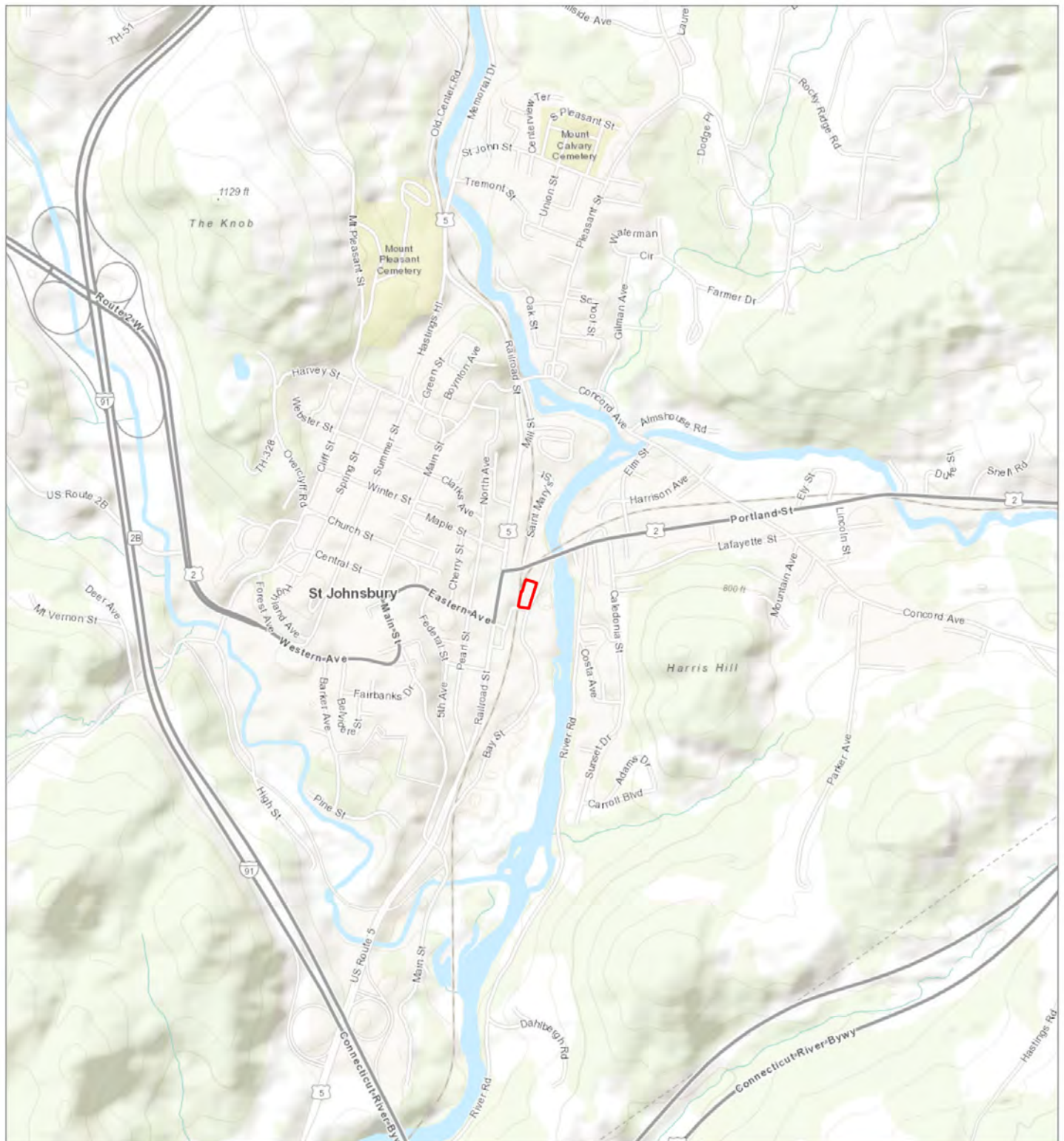
## Appendix A: Figures

---

*Figure 1: Site Location Map*

*Figure 2: SSD System Plan*

*Figure 3: SSD System Details*



# LEGEND

Site Boundary



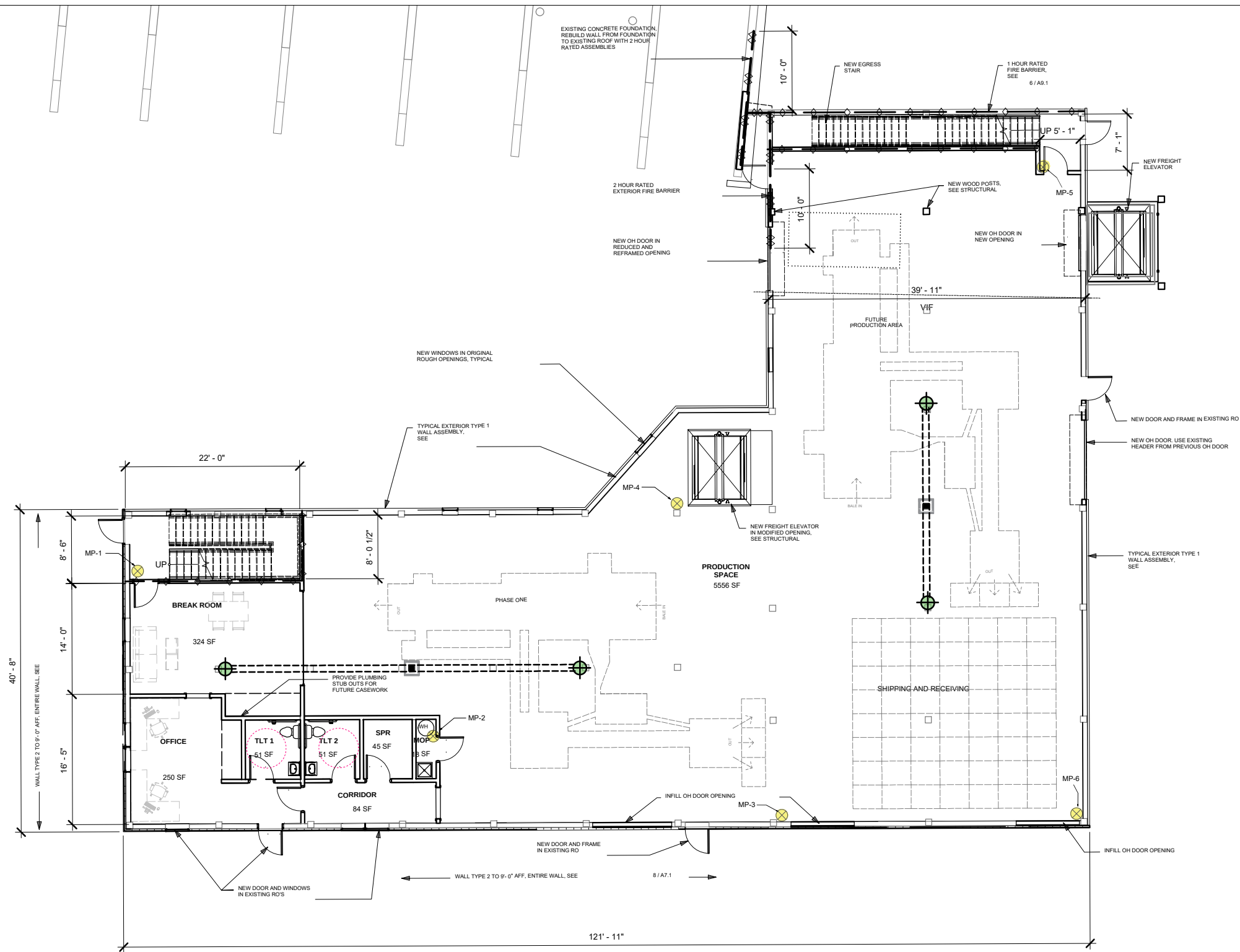
## Figure 1: Location Map

202 Bay Street  
St. Johnsbury, Vermont

Prepared for VT DEC

 **STONE ENVIRONMENTAL**

File: O:\PROJ-20\YEAR\20-117 202 Bay Street\Drawings\AutoCAD\20-117 202 Bay St.dwg



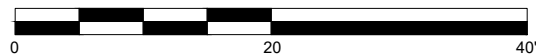
#### LEGEND

- SSD MONITORING POINT
- SSD EXTRACTION WELL
- SSD EXHAUST ROOF PERFORATION/FAN LOCATION
- SSD EFFLUENT PIPE

Notes:  
Building layout derived from Scott + Partners  
Architecture, Zion Growers, 12/20/21.

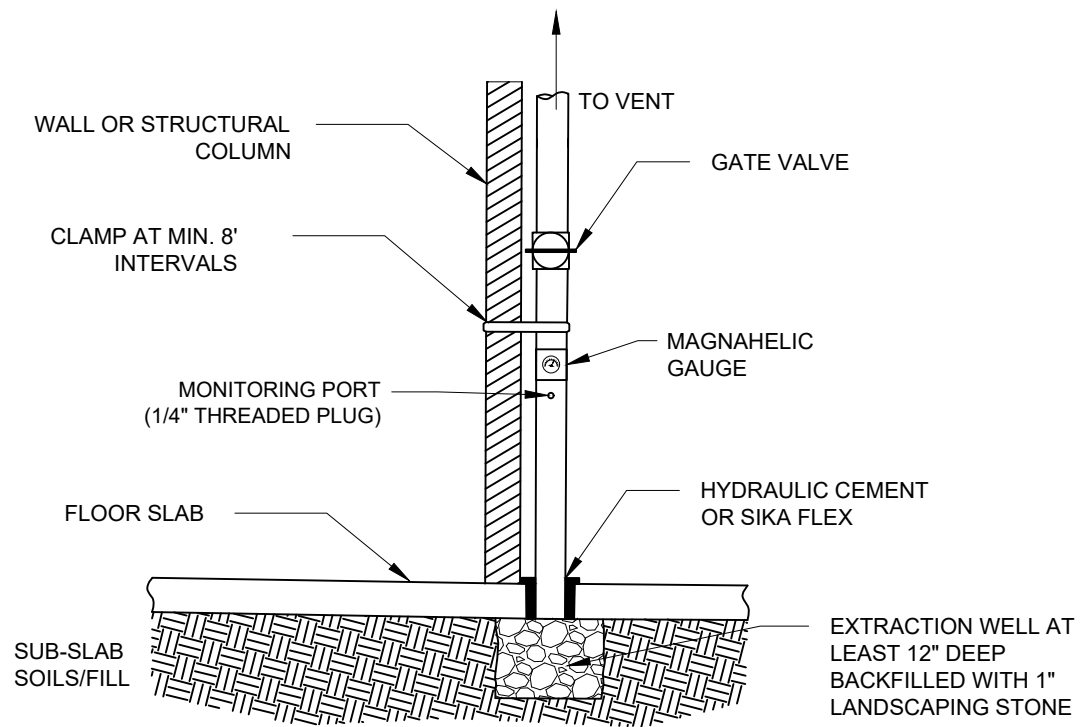
Drawn On: 04/05/2022  
Drawn By: LBR  
Checked On: 04/07/2022  
Checked By: LJR  
Project No.: 20-117

| # | Date       | Drwn | Chk'd | App'd | Description     |
|---|------------|------|-------|-------|-----------------|
| 1 | 04/05/2022 | LBR  |       |       | Initial Drawing |
| 2 | 04/07/2022 | LJR  |       |       | Final Drawing   |

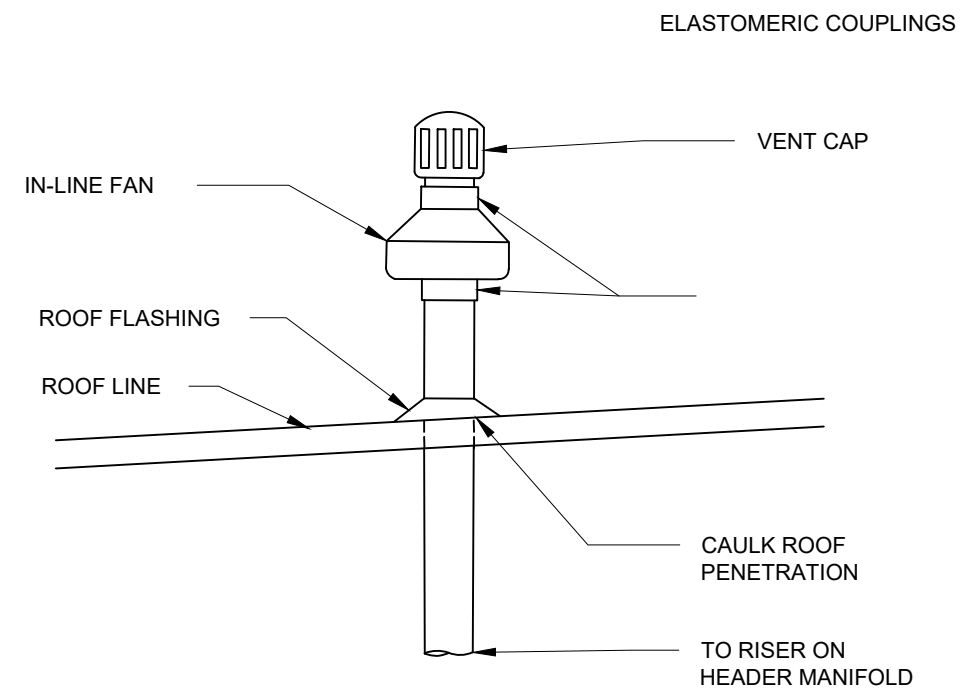


**STONE ENVIRONMENTAL**  
535 Stone Cutters Way / Montpelier / VT / 05602 / USA  
802.229.4541 / info@stone-env.com / www.stone-env.com

SSD SYSTEM LAYOUT  
CORRECTIVE ACTION PLAN  
202 BAY STREET  
ST JOHNSBURY VERMONT



**A** EXTRACTION WELL AND COLLECTOR PIPE DETAIL  
NOT TO SCALE



**B** ROOF PENETRATION AND VENT DETAIL  
NOT TO SCALE

File: O:\PROJ-20\YEAR\20-117 202 Bay Street\DrawData\AutoCAD\20-117 202 Bay St.dwg

| DRAWING CREDITS | REVISIONS |            |      |       |       |              |
|-----------------|-----------|------------|------|-------|-------|--------------|
|                 | #         | Date       | Drwn | Chk'd | App'd | Description  |
|                 | 1         | 04/05/2022 | LBR  |       |       | Drawn On:    |
|                 | 2         | 04/07/2022 | LJR  |       |       | Checked On:  |
|                 | 3         |            |      |       |       | Checked By:  |
|                 | 4         |            |      |       |       | Project No.: |

DRAWING SCALE



**STONE ENVIRONMENTAL**

535 Stone Cutters Way / Montpelier / VT / 05602 / USA  
802.229.4541 / info@stone-env.com / www.stone-env.com

SSD SYSTEM DETAILS  
CORRECTIVE ACTION PLAN  
202 BAY STREET

ST JOHNSBURY VERMONT

---

## Appendix B: SSD Systems Component Manuals

---

**0.025 (64) SPACE CREATED BY 3 SPACER PADS WHEN SURFACE MOUNTED. DO NOT OBSTRUCT PROVIDES PATH FOR RELIEF OF OVERPRESSURE.**

**RUBBER PRESSURE RELIEF PLUG WILL UNSEAT ITSELF WHEN GAGE IS OVERPRESSURIZED**

**(3) 6-32 X 3/16 (4.76) DEEP HOLES EQUALLY SPACED ON A 04-1/8 (104.78) BOLT CIRCLE FOR PANEL MOUNTING**

**1/8 FEMALE NPT HIGH PRESSURE CONNECTION**

**1/8 FEMALE NPT LOW PRESSURE CONNECTION**

**1/8 FEMALE NPT HIGH PRESSURE CONNECTION**

**1/8 FEMALE NPT LOW PRESSURE CONNECTION**

**1/8 FEMALE NPT HIGH PRESSURE CONNECTION**

**1/8 FEMALE NPT LOW PRESSURE CONNECTION**

**04-1/2 (114.3)**

**1-1/4 (31.75)**

**15/32 (11.91)**

**1-11/16 (42.86)**

**17/32 (13.49)**

**7/16 (11.11)**

**04-3/4 (120.65) PANEL CUTOUT**

**05 (127)**

**04-1/2 (114.3)**

**1-1/4 (31.75)**

**15/32 (11.91)**

**04-1/2 (114.3)**

**2-17/32 (64.29)**

**3/16 (4.76)**

**04-47/64 (120.27)**

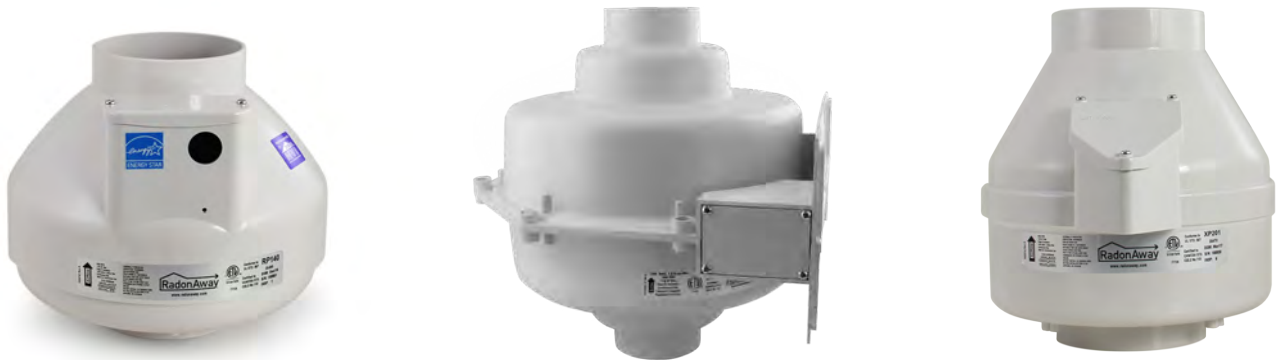
**05-1/2 (139.70) MOUNTING RING**

**11/16 (17.46)**

**1-3/4 (44.45)**

**1/2 (12.70)**

105  
www.dwyer-inst.com  
e-mail: info@dwyer-inst.com



# RP, GP, XP Pro Series Installation Instructions



Fan Installation & Operating Instructions  
RP, GP, XP Pro Series Fans  
*Please Read and Save These Instructions.*

DO NOT CONNECT POWER SUPPLY UNTIL FAN IS COMPLETELY INSTALLED. MAKE SURE ELECTRICAL SERVICE TO FAN IS LOCKED IN “OFF” POSITION. DISCONNECT POWER BEFORE SERVICING FAN.

- 1. **WARNING!** For General Ventilating Use Only. Do Not Use to Exhaust Hazardous, Corrosive or Explosive Materials, Gases or Vapors. See Vapor Intrusion Application Note #AN001 for important information on VI Applications. RadonAway.com/vapor-intrusion
- 2. **NOTE:** Fan is suitable for use with solid state speed controls; however, use of speed controls is not generally recommended.
- 2. **WARNING!** Check voltage at the fan to insure it corresponds with nameplate.
- 3. **WARNING!** Normal operation of this device may affect the combustion airflow needed for safe operation of fuel burning equipment. Check for possible backdraft conditions on all combustion devices after installation.
- 4. **NOTICE!** There are no user serviceable parts located inside the fan unit.  
**Do NOT attempt to open.** Return unit to the factory. (See Warranty, p. 8, for details.)
- 5. **WARNING!** Do not leave fan unit installed on system piping without electrical power for more than 48 hours. Fan failure could result from this non-operational storage.
- 6. **WARNING!** TO REDUCE THE RISK OF FIRE, ELECTRIC SHOCK, OR INJURY TO PERSONS, OBSERVE THE FOLLOWING:
  - a) Use this unit only in the manner intended by the manufacturer. If you have questions, contact the manufacturer. (See p. 8.)
  - b) Before servicing or cleaning unit, switch power off at service panel and lock the service disconnecting means to prevent power from being switched on accidentally. When the service disconnecting means cannot be locked, securely fasten a prominent warning device, such as a tag, to the service panel.
  - c) Installation work and electrical wiring must be done by qualified person(s) in accordance with all applicable codes and standards, including fire rated construction.
  - d) Sufficient air is needed for proper combustion and exhausting of gases through the flue (chimney) of fuel burning equipment to prevent backdrafting. Follow the heating equipment manufacturers’ guidelines and safety standards such as those published by any National Fire Protection Association, and the American Society for Heating, Refrigerating and Air Conditioning Engineers (ASHRAE), and the local code authorities.
  - e) When cutting or drilling into a wall or ceiling, do not damage electrical wiring and other hidden utilities.
  - f) Ducted fans must always be vented to outdoors.
  - g) If this unit is to be installed over a tub or shower, it must be marked as appropriate for the application and be connected to a GFCI (Ground Fault Circuit Interrupter) protected branch circuit.



Fan Installation & Operating Instructions

| RP Pro Series |           | GP Pro Series |           | XP Pro Series |           |
|---------------|-----------|---------------|-----------|---------------|-----------|
| RP140         | P/N 28460 | GP201         | P/N 28465 | XP151         | P/N 28469 |
| RP145         | P/N 28461 | GP301         | P/N 28466 | XP201         | P/N 28470 |
| RP260         | P/N 28462 | GP401         | P/N 28467 |               |           |
| RP265         | P/N 28463 | GP501         | P/N 28468 |               |           |
| RP380         | P/N 28464 |               |           |               |           |

1.0 SYSTEM DESIGN CONSIDERATIONS

1.1 INTRODUCTION

The RP, GP and XP Pro Series Radon Fans are intended for use by trained, professional, certified/licensed radon mitigators. The purpose of these instructions is to provide additional guidance for the most effective use of RP, GP and XP Series Fans. These instructions should be considered supplemental to EPA/radon industry standard practices, state and local building codes and regulations. In the event of a conflict, those codes, practices and regulations take precedence over these instructions.

1.2 FAN SEALING

The RP, GP and XP Pro Series Fans are factory sealed; no additional caulk or other materials are required to inhibit air leakage.

1.3 ENVIRONMENTALS

The RP, GP and XP Pro Series Fans are designed to perform year-round in all but the harshest climates without additional concern for temperature or weather. For installations in an area of severe cold weather, please contact RadonAway for assistance. When not in operation, the fan should be stored in an area where the temperature is never less than 32 degrees F or more than 100 degrees F.

1.4 ACOUSTICS

The RP, GP and XP Pro Series Fans, when installed properly, operate with little or no noticeable noise to the building occupants. The velocity of the outgoing air should be considered in the overall system design. In some cases the “rushing” sound of the outlet air may be disturbing. In these instances, the use of a RadonAway Exhaust Muffler is recommended.

(To ensure quiet operation of inline and remote fans, each fan shall be installed using sound attenuation techniques appropriate for the installation. For bathroom and general ventilation applications, at least 8 feet of insulated flexible duct shall be installed between the exhaust or supply grille(s) and the fan(s). RP, GP and XP Pro Series Fans are not suitable for kitchen range hood remote ventilation applications.)

1.5 GROUND WATER

In the event that a temporary high water table results in water at or above slab level, water may be drawn into the riser pipes, thus blocking air flow to the RP, GP and XP Pro Series Fan. The lack of cooling air may result in the fan cycling on and off as the internal temperature rises above the thermal cutoff. Should this condition arise, it is recommended that the fan be turned off until the water recedes, allowing for return to normal operation.

1.6 SLAB COVERAGE

The RP, GP and XP Pro Series Fans can provide coverage up to 2000+ sq. ft. per slab penetration. This will primarily depend on the sub-slab material in any particular installation. In general, the tighter the material, the smaller the area covered per penetration. Appropriate selection of the RP, GP and XP Pro Series Fan best suited for the sub-slab material can improve the slab coverage. The RP, GP and XP Pro Series have a wide range of models to choose from to cover a wide range of sub-slab materials. The RP140 and 145 are best suited for general purpose use. The RP 260 can be used where additional airflow is required, and the RP265 and RP 380 are best suited for large slab, high airflow applications. Additional suction points can be added as required. It is recommended that a small pit (5 to 10 gallons in size) be created below the slab at each suction hole.

1.7 CONDENSATION & DRAINAGE

Condensation is formed in the piping of a mitigation system when the air in the piping is chilled below its dew point. This can occur at points where the system piping goes through unheated space such as an attic, garage or outside. The system design must provide a means for water to drain back to a slab hole to remove the condensation. The RP, GP and XP Pro Series Fan MUST be mounted vertically plumb and level, with the outlet pointing up for proper drainage through the fan. Avoid mounting the fan in any orientation that will allow water to accumulate inside the fan housing. The RP, GP and XP Pro Series Fans are NOT suitable for underground burial.

For RP, GP and XP Pro Series Fan piping, the following table provides the minimum recommended pipe diameter and pitch under several system conditions.

| Pipe Diameter | Minimum Rise per Ft of Run* |         |          |
|---------------|-----------------------------|---------|----------|
|               | @25 CFM                     | @50 CFM | @100 CFM |
| 4"            | 1/8"                        | 1/4"    | 3/8"     |
| 3"            | 1/4"                        | 3/8"    | 1 1/2"   |

RISE

RUN

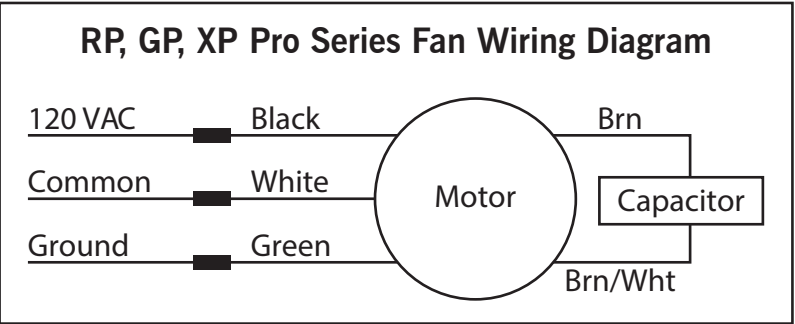
See p. 7 for detailed specifications.

1.8 SYSTEM MONITOR & LABEL

A System Monitor, such as a manometer (P/N 50017) or audible alarm (P/N 28001-2, 28001-4 or 28421), is required to notify the occupants of a fan system malfunction. A System Label (provided with Manometer P/N 50017) with instructions for contacting the installing contractor for service and identifying the necessity for regular radon tests to be conducted by the building occupants must be conspicuously placed in a location where the occupants frequent and can see the label.

1.9 ELECTRICAL WIRING

The RP, GP and XP Pro Series Fans operate on standard 120V, 60Hz AC. All wiring must be performed in accordance with National Fire Protection (NFPA) National Electrical Code, Standard #70, current edition, for all commercial and industrial work, and state and local building codes. All wiring must be performed by a qualified and licensed electrician. Outdoor installations require the use of a UL Listed watertight conduit. Ensure that all exterior electrical boxes are outdoor rated and properly sealed to prevent water penetration into the box. A means, such as a weep hole, is recommended to drain the box.

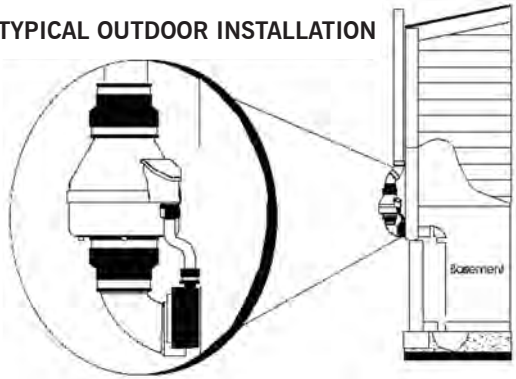


1.10 SPEED CONTROLS

The RP, GP and XP Pro Series Fans are rated for use with electronic speed controls; however, speed controls are generally not recommended. If used, the recommended speed control is Pass & Seymour Solid State Speed Control (Cat. No. 94601-1).

2.0 INSTALLATION

The RP, GP and XP Pro Series Fans can be mounted indoors or outdoors. (It is suggested that EPA and radon mitigation standards recommendations be followed in choosing the fan location.) The GP fans have an integrated mounting bracket; RP and XP Pro Series Fans may be mounted directly on the system piping or fastened to a supporting structure by means of an optional mounting bracket. The ducting from the fan to the outside of the building has a strong effect on noise and fan energy use. Use the shortest, straightest duct routing possible for best performance, and avoid installing the fan with smaller ducts than recommended. Insulation around the ducts can reduce energy loss and inhibit mold growth. Fans installed with existing ducts may not achieve their rated airflow.



2.1 MOUNTING

Mount the RP, GP and XP Pro Series Fan vertically with outlet up. Insure the unit is plumb and level. When mounting directly on the system piping assure that the fan does not contact any building surface to avoid vibration noise.

2.2 MOUNTING BRACKET (optional)

The RP and XP Pro Series Fans may be optionally secured with the RadonAway P/N 25007 mounting bracket. Foam or rubber grommets may also be used between the bracket and mounting surface for vibration isolation.

2.3 SYSTEM PIPING

Complete piping run, using flexible couplings as a means of disconnect for servicing the unit and for vibration isolation. As the fan is typically outside of the building thermal boundary and is venting to the outside, installation of insulation around the fan is not required.

2.4 ELECTRICAL CONNECTION

Connect wiring with wire nuts provided, observing proper connections (See Section 1.9). Note that the fan is not intended for connection to rigid metal conduit.

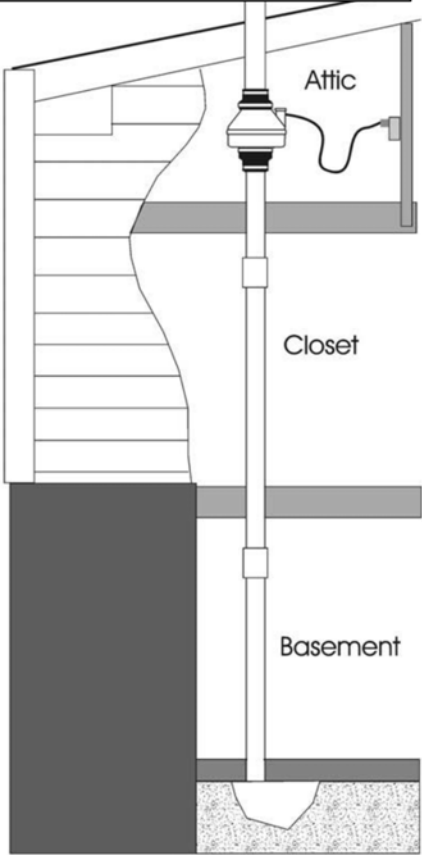
2.5 VENT MUFFLER (optional)

Install the muffler assembly in the selected location in the outlet ducting. Solvent weld all connections. The muffler is normally installed at the end of the vent pipe.

2.6 OPERATION CHECKS & ANNUAL SYSTEM MAINTENANCE

- Verify all connections are tight and **leak-free**.
- Ensure the RP, GP and XP Pro Series Fan and all ducting are **secure and vibration-free**.
- Verify system vacuum pressure with manometer. **Insure** vacuum pressure is within normal operating range and **less than** the maximum recommended operating pressure.  
(Based on sea-level operation, at higher altitudes reduce by about 4% per 1000 feet)  
(Further reduce Maximum Operating Pressure by 10% for High Temperature environments.)  
*See Product Specifications. If this is exceeded, increase the number of suction points.*
- Verify Radon levels by testing to EPA Protocol and applicable testing standards.

TYPICAL INDOOR INSTALLATION



THE FOLLOWING CHARTS SHOW THE PERFORMANCE OF THE RP, GP and XP PRO SERIES FANS

RP Pro Series Product Specifications

| Typical CFM Vs. Static Pressure “WC |     |      |     |      |      |       |      |       |      |
|-------------------------------------|-----|------|-----|------|------|-------|------|-------|------|
| Model                               | 0”  | .25” | .5” | .75” | 1.0” | 1.25” | 1.5” | 1.75” | 2.0” |
| RP140                               | 135 | 103  | 70  | 14   | -    | -     | -    | -     |      |
| RP145                               | 166 | 146  | 126 | 104  | 82   | 61    | 41   | 21    | 3    |
| RP260                               | 251 | 209  | 157 | 117  | 70   | 26    | -    | -     | -    |
| RP265                               | 375 | 330  | 282 | 238  | 204  | 170   | 140  | 108   | 70   |
| RP380                               | 531 | 490  | 415 | 340  | 268  | 200   | 139  | 84    | 41   |

| Model | Power Consumption<br>120VAC, 60Hz, 1.5 Amp Maximum | Maximum Recommended Operation Pressure*<br>(Sea Level Operation)** |
|-------|----------------------------------------------------|--------------------------------------------------------------------|
| RP140 | 15 - 21 watts                                      | 0.7” WC                                                            |
| RP145 | 41 - 72 watts                                      | 1.7” WC                                                            |
| RP260 | 47-65 watts                                        | 1.3” WC                                                            |
| RP265 | 95 - 139 watts                                     | 2.3” WC                                                            |
| RP380 | 96 - 138 watts                                     | 2.0” WC                                                            |

\*Reduce by 10% for High Temperature Operation \*\*Reduce by 4% per 1000 ft. of altitude.

| Model | Size                  | Weight   | Inlet/Outlet                               | L.2 |
|-------|-----------------------|----------|--------------------------------------------|-----|
| RP140 | 8.5”H x 9.7” Dia.     | 5.5 lbs  | 4.5”OD (4.0” PVC Sched 40 size compatible) | 25  |
| RP145 | 8.5”H x 9.7” Dia.     | 5.5 lbs  | 4,5” OD                                    | 15  |
| RP260 | 8.6”H x 11.75” Dia.   | 5.5 lbs  | 6.0” OD                                    | 48  |
| RP265 | 8.6”H x 11.75” Dia.   | 6.5 lbs  | 6.0” OD                                    | 30  |
| RP380 | 10.53”H x 13.41” Dia. | 11.5 lbs | 8.0” OD                                    | 57  |

L.2 = Estimated Equivalent Length of Rigid Metal Ducting resulting in .2” WC pressure loss for Duct Size listed. Longer Equivalent Lengths can be accommodated at Flows Lower than that at .2” WC pressure loss (see CFM Vs Static Pressure “WC Table).

XP Pro Series Product Specifications

| Typical CFM Vs. Static Pressure “WC |     |     |      |      |       |      |
|-------------------------------------|-----|-----|------|------|-------|------|
|                                     | 0”  | .5” | 1.0” | 1.5” | 1.75” | 2.0” |
| XP151                               | 167 | 127 | 77   | -    | -     | -    |
| XP201                               | 126 | 98  | 66   | 26   | -     | -    |

| Model | Power Consumption<br>120VAC, 60Hz, 1.5 Amp Maximum | Maximum Recommended Operation Pressure*<br>(Sea Level Operation)** |
|-------|----------------------------------------------------|--------------------------------------------------------------------|
| XP151 | 53-70 watts                                        | 1.4” WC                                                            |
| XP201 | 38-74 watts                                        | 1.6” WC                                                            |

\*Reduce by 10% for High Temperature Operation \*\*Reduce by 4% per 1000 ft. of altitude.

| Model | Size              | Weight | Inlet/Outlet                               |
|-------|-------------------|--------|--------------------------------------------|
| XP151 | 9.5”H x 8.5” Dia. | 6 lbs  | 4.5”OD (4.0” PVC Sched 40 size compatible) |
| XP201 | 9.5”H x 8.5” Dia. | 6 lbs  | 4.5” OD                                    |

GP Pro Series Product Specifications

| Typical CFM Vs. Static Pressure “WC |      |      |      |      |      |      |      |
|-------------------------------------|------|------|------|------|------|------|------|
|                                     | 1.0” | 1.5” | 2.0” | 2.5” | 3.0” | 3.5” | 4.0” |
| GP201                               | 54   | 42   | 11   | -    | -    | -    | -    |
| GP301                               | 64   | 54   | 41   | 4    | -    | -    | -    |
| GP401                               | -    | 61   | 52   | 44   | 22   | -    | -    |
| GP501                               | -    | -    | 66   | 58   | 50   | 27   | 4    |

| Model | Power Consumption<br>120VAC, 60Hz, 1.5 Amp Maximum | Maximum Recommended Operation Pressure*<br>(Sea Level Operation)** |
|-------|----------------------------------------------------|--------------------------------------------------------------------|
| GP201 | 31-65 watts                                        | 1.8” WC                                                            |
| GP301 | 56-100 watts                                       | 2.3” WC                                                            |
| GP401 | 62-128 watts                                       | 3.0” WC                                                            |
| GP501 | 68 - 146 watts                                     | 3.8” WC                                                            |

\*Reduce by 10% for High Temperature Operation \*\*Reduce by 4% per 1000 ft. of altitude.

| Model | Size              | Weight | Inlet/Outlet                               |
|-------|-------------------|--------|--------------------------------------------|
| GP201 | 13”H x 12.5” Dia. | 12 lbs | 3.5”OD (3.0” PVC Sched 40 size compatible) |
| GP301 | 13”H x 12.5” Dia. | 12 lbs | 3.5” OD                                    |
| GP401 | 13”H x 12.5” Dia. | 12 lbs | 3.5” OD                                    |
| GP501 | 13”H x 12.5” Dia. | 12 lbs | 3.5” OD                                    |

RP, XP and GP Pro Series Additional Specifications

| Model | Recommended Duct            | PVC Pipe Mounting                                                                                                     | Thermal Cutout | Insulation Class   |
|-------|-----------------------------|-----------------------------------------------------------------------------------------------------------------------|----------------|--------------------|
| RP140 | 3” or 4” Schedule 20/40 PVC | Mount on the duct pipe or with optional mounting bracket.<br>For Ventilation: 4”, 6” or 8” Rigid or Flexible Ducting. | 130°C/266°F    | Class B Insulation |
| RP145 |                             |                                                                                                                       | 130°C/266°F    | Class F Insulation |
| RP260 |                             |                                                                                                                       | 150°C/302°F    |                    |
| RP265 |                             |                                                                                                                       | 150°C/302°F    |                    |
| RP380 | 6” Schedule 20/40 PVC Pipe  |                                                                                                                       | 150°C/302°F    |                    |
| XP151 | 3” or 4” Schedule 20/40 PVC | Fan may be mounted on the duct pipe or with integral flanges.                                                         | 120°C/248°F    | Class B Insulation |
| XP201 |                             |                                                                                                                       |                |                    |
| GP201 | 3” or 4” Schedule 20/40 PVC | Fan may be mounted on the duct pipe or with integral flanges.                                                         | 120°C/248°F    | Class B Insulation |
| GP301 |                             |                                                                                                                       |                |                    |
| GP401 |                             |                                                                                                                       |                |                    |
| GP501 |                             |                                                                                                                       |                |                    |

Continuous Duty  
3000 RPM  
Thermally Protected  
RP, GP Residential and Commercial  
XP Residential Only  
Rated for Indoor or Outdoor Use



LISTED  
Electric Fan



Conforms to  
UL STD. 507  
Certified to  
CAN/CSA STD.  
C22.2 No. 113

## IMPORTANT INSTRUCTIONS TO INSTALLER

Inspect the RadonAway® RP, GP and XP Pro Series Fan for shipping damage within 15 days of receipt. **Notify RadonAway of any damages immediately.** RadonAway is not responsible for damages incurred during shipping. However, for your benefit, RadonAway does insure shipments.

There are no user serviceable parts inside the fan. **Do not attempt to open the housing.** Return unit to factory. (See Warranty below).

Install the RP, GP and XP Pro Series Fan in accordance with all EPA, ANSI/AARST standard practices, and state and local building codes and regulations.

**Provide a copy of this instruction or comparable radon system and testing information to the building occupants after completing system installation.**

### Warranty

RadonAway® warrants that the RP, GP (excluding GP500) and XP Pro Series Fan (the "Fan") will be free from defects in materials and workmanship for a period of 12 months from the date of purchase or 18 months from the date of manufacture, whichever is sooner (the "Warranty Term").

RadonAway® will replace any fan which fails due to defects in materials or workmanship during the Warranty Term. This Warranty is contingent on installation of the Fan in accordance with the instructions provided. This Warranty does not apply where any repairs or alterations have been made or attempted by others, or if the unit has been abused or misused. Warranty does not cover damage in shipment unless the damage is due to the negligence of RadonAway®.

The Fan must be returned (at Owner's cost) to the RadonAway® factory. Any Fan returned to the factory will be discarded unless the Owner provides specific instructions along with the Fan when it is returned regardless of whether or not the Fan is actually replaced under this warranty. Proof of purchase must be supplied upon request for service under this Warranty.

#### 5-YEAR EXTENDED WARRANTY WITH PROFESSIONAL INSTALLATION.

RadonAway® will extend the Warranty Term of the fan to 60 months (5 years) from date of purchase or 66 months from date of manufacture, whichever is sooner, provided that the fan is installed by a professional radon mitigation contractor. Proof of purchase and/or proof of professional installation may be required for service under this warranty. No extended warranty is offered outside the Continental United States and Canada beyond the standard 12 months from the date of purchase or 18 months from the date of manufacture, whichever is sooner.

RadonAway® is not responsible for installation, removal or delivery costs associated with this Warranty.

#### LIMITATION OF WARRANTY

**EXCEPT AS STATED ABOVE, THE RP, GP (excluding GP500) and XP PRO SERIES FANS ARE PROVIDED WITHOUT WARRANTY OF ANY KIND, EITHER EXPRESS OR IMPLIED, INCLUDING, WITHOUT LIMITATION, IMPLIED WARRANTIES OF MERCHANTABILITY AND FITNESS FOR A PARTICULAR PURPOSE.**

**IN NO EVENT SHALL RADONAWAY BE LIABLE FOR ANY DIRECT, INDIRECT, SPECIAL, INCIDENTAL, OR CONSEQUENTIAL DAMAGES ARISING OUT OF, OR RELATING TO, THE FAN OR THE PERFORMANCE THEREOF. RADONAWAY'S AGGREGATE LIABILITY HEREUNDER SHALL NOT IN ANY EVENT EXCEED THE AMOUNT OF THE PURCHASE PRICE OF SAID PRODUCT. THE SOLE AND EXCLUSIVE REMEDY UNDER THIS WARRANTY SHALL BE THE REPAIR OR REPLACEMENT OF THE PRODUCT, TO THE EXTENT THE SAME DOES NOT MEET WITH RADONAWAY'S WARRANTY AS PROVIDED ABOVE.**

For service under this Warranty, contact RadonAway for a Return Material Authorization (RMA) number and shipping information. No returns can be accepted without an RMA. If factory return is required, the customer assumes all shipping costs, including insurance, to and from factory.

RadonAway® 3 Saber Way  
Ward Hill, MA 01835 USA TEL (978) 521-3703  
FAX (978) 521-3964  
Email to: Returns@RadonAway.com

Record the following information for your records:

Serial Number: \_\_\_\_\_

Purchase Date: \_\_\_\_\_

# RSA1 ALARM

## RADON SYSTEM ALARM

The RadonAway RSA1 Radon System Alarm is an advanced vacuum monitoring device utilizing piezoresistive pressure sensor (PPS) technology. It provides homeowners with an easy to read, easy to use system monitor that requires no interpretation. Its audible and visual indicators alerts them when the radon system vacuum pressure is too low to be effective. This monitor complies with Section 9.2.2 of the ANSI/AARST *Soil Gas Mitigation Standards For Existing Homes*, which calls for an audible and visual system monitor.

**This monitor does not measure radon levels.**



## FEATURES

- Advanced PPS\* Technology
- Easy Installation
- Pipe or Remote Mount
- Battery-Operated  
(No Wiring Required)
- Visual and Audible Indicators
- 7 Functional Modes
- For Use on 2", 3", 4" or 6" Pipe, or Flat Surface

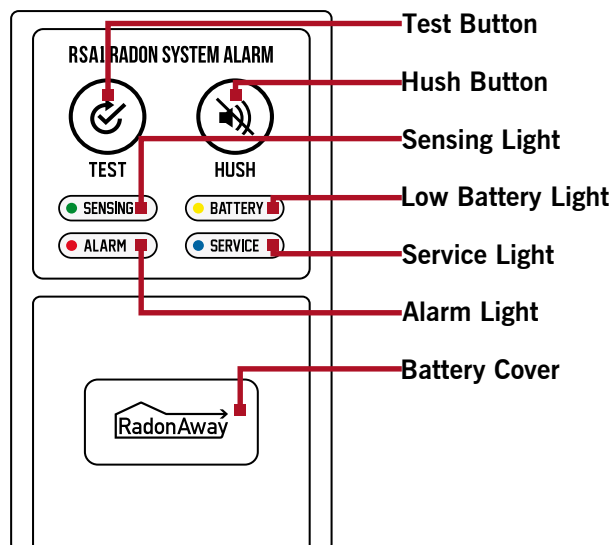
\* piezoresistive pressure sensor

## PACKAGE INCLUDES

- RSA-1 Radon System Alarm
- Wall Mount Adapter
- Pipe Mount Adapter
- 5" Length of Flexible Tubing
- Battery
- Product Instructions

## SPECIFICATIONS

|                           |                                     |
|---------------------------|-------------------------------------|
| <b>Sensing Light:</b>     | -24 to -200 Pa                      |
| <b>Alarm Light:</b>       | ≥90% reduction of baseline pressure |
| <b>Service Light:</b>     | 3+ Pre-Alarm Trig. @ 48 Hrs         |
| <b>Low Battery Light:</b> | <3.35 V                             |
| <b>Hush Button:</b>       | Stops alarm sounds for 7 days       |
| <b>Test Button:</b>       | Sounds alarm / activates lights     |
| <b>Dimensions:</b>        | W x H x D (2.19" x 3.75" x 1.37")   |
| <b>Overpressure:</b>      | ±5KPa (±20"WC)                      |



---

## Appendix C: Operations and Monitoring Forms

---



**Project Name/Number:**

**Date:**

**Staff:**

[illegible]

Signature/Date: \_\_\_\_\_

**LAND USE RESTRICTIONS – ANNUAL INSTITUTIONAL CONTROL INSPECTION FORM**

Our records indicate that this property maintains institutional or engineering controls associated with a land use restriction. Please indicate the state of the following controls, as applicable, on the property.

**SMS Site #:** \_\_\_\_\_  
**Owner Name:** \_\_\_\_\_  
**Site/Property Name:** \_\_\_\_\_  
**Site/Property Address:** \_\_\_\_\_

|                                                                                                                                | YES | NO | COMMENTS |
|--------------------------------------------------------------------------------------------------------------------------------|-----|----|----------|
| <b>Paved Caps:</b>                                                                                                             |     |    |          |
| 1. Is there any cracking, fractures, or breaking of the pavement?                                                              |     |    | _____    |
| 2. Has the pavement been punctured, providing a risk of direct contact?                                                        |     |    | _____    |
| <b>Buildings/Structures:</b>                                                                                                   |     |    |          |
| 1. Are there visible cracks or fractures in the foundation?                                                                    |     |    | _____    |
| 2. Have there been additions or improvements to the structure?                                                                 |     |    | _____    |
| 3. Has there been standing water or flood in the basement of the structure (since receipt of the Certificate of Completion)?   |     |    | _____    |
| <b>Sub-slab Depressurization System (SSD):</b>                                                                                 |     |    |          |
| 1. Has the SSD been operational and appropriately maintained for the past year, as described in the Certificate of Completion? |     |    | _____    |
| <b>Soil/Grass Caps:</b>                                                                                                        |     |    |          |
| 1. Is there any evidence of erosion?                                                                                           |     |    | _____    |
| 2. Are monitoring wells at the site damaged, un-locatable, or otherwise in unacceptable condition?                             |     |    | _____    |
| 3. Have survey pins been repositioned or removed?                                                                              |     |    | _____    |
| 4. Is there any evidence of burrowing wildlife?                                                                                |     |    | _____    |
| 5. Are there bare spots larger than 3 square feet in grassy areas?                                                             |     |    | _____    |
| 6. Has there been any subsurface work conducted on the property?                                                               |     |    | _____    |

*I certify that I have responded to each of the questions above to the best of my knowledge.*

**Signature:** \_\_\_\_\_ **Date:** \_\_\_\_\_

**Submit by email or submit original form to the SMS Project Manager at the address listed below:**

Vermont Department of Environmental Conservation  
Waste Management & Prevention Division/Sites Management Section  
1 National Life Drive – Davis 1  
Montpelier, VT 05620-3704

**SMS Project Manager:** \_\_\_\_\_