

Community Relations Plan

Former E.T. & H.K. Ide, Inc. Property, 202 Bay Street St. Johnsbury, VT
May 10, 2022

Overview:

The purpose of the Community Relations Plan (CRP) is to describe Zion Growers (the Property Owner) strategy to address the needs and concerns of St. Johnsbury's residents potentially affected by the proposed remediation of environmental contamination present within the former E.T. & H.K. Ide, Inc. property located at 202 Bay Street in St. Johnsbury, Vermont (the "Site").

The CRP outlines how the Property Owner and redevelopment stakeholders have involved, and will continue to involve, affected residents, Town officials and local organizations in the decision-making process regarding the environmental cleanup at the site. The success of the environmental cleanup and subsequent redevelopment of the Site hinges on informed citizen involvement in each step of the cleanup process.

Zion Growers intends to redevelop the Site as an industrial hemp processing facility, located primarily within the former retail and storage building located closest to Bay Street and hereafter referred to as 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.

Spokesperson and Information Repository:

The Spokespersons for this project are Brandon McFarlane and Travis Samuels, Owners of Zion Growers.

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Copies of all environmental assessment reports are located at the Zion Growers offices at the above address.

Copies of all of these documents are also available in Montpelier, Vermont at the Department of Environmental Conservation, Waste Management and Prevention Division offices.

All public meetings will be held at the St. Johnsbury Welcome Center located at 51 Depot Square, St. Johnsbury, Vermont

Site Description and History:

Site Location

The Site is comprised of one, 0.98-acre parcel, located at 202 Bay Street identified with the Town of St. Johnsbury as Parcel #1V010021. 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.

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 (the “L” building), former office building, and a carriage shed. Site buildings are largely vacant except for storage.

Site History

According to historical records reviewed and interviews with the Site owner completed during a Phase I Environmental Site Assessment (ESA) completed in 2021, 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 in the 1990s, 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 purchased the Site in 2021, with the intention of redeveloping the Site as an industrial hemp processing facility¹.

The following is a chronology of Site development activities.

- 1890: Elmore Ide purchased the Site for construction of a new grain mill.
- 1900: The grain elevator building was constructed by E.T. & H.K. Ide, Inc.
- 1927: A two-story building was constructed to hold 900 tons of bagged feed.

¹ Chronology primarily from <http://etandhkide.com/>

- 1964: The Ides start a home garden supply store at the Site.
- 1986: A 95-foot-tall grain elevator is installed at the Site.
- 1959: Saw Room added to the north of the Machine Operating Room (41 x 135 feet). This room housed several machines, raw materials, storage and a small receiving office space.
- 1990s to 2021: E.T. & H.K. Ide, Inc. ceases Site operations. Site buildings are leased to various contractors and commercial businesses.
- 2021 - Present: Site purchased by Zion Growers. Planned redevelopment as industrial hemp processing facility to begin in 2022.

Summary of past assessment and remediation work and current status of the threat to public health and the environment:

Environmental investigations began on the Site in 2011 as part of an area wide assessment of the Bay Street Area Project in St. Johnsbury, Vermont. Environmental investigations more focused on the Site resumed in 2021 on behalf of Zion Growers in anticipation of their purchase of the Site. The following environmental investigations have produced reports on the Site:

- 2011; Stone Environmental, Inc.; Area Wide Assessment of the Bay Street Project Area; evaluation of the Site and nearby properties for potential environmental concerns
- January 2021; Stone Environmental, Inc.; Phase I ESA
- July 2021; Stone Environmental, Inc.; Phase II ESA
- August 2021; KD Associates, Inc.; Lead Assessment
- March 2022; Stone Environmental, Inc.; Supplemental Site Investigation and Evaluation of Corrective Action Alternatives
- May 2022; Stone Environmental, Inc.; Partial Corrective Action Plan

The Area Wide Assessment 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 several Recognized Environmental Conditions (RECs) and contaminants of concern associated with the Site, including:

- Presence of a rail spur leading to the coal shed for receipt of coal to hoppers located below this building
- Containers of petroleum and/or potentially hazardous materials within the grain elevator building, carriage shed, and exterior areas
- Possible use of fumigants within grain storage areas
- Presence of lubricants and solvents associated with Site maintenance activities

- Potentially polychlorinated biphenyl containing lubricants associated with grain elevator equipment
- Location of the Site adjacent a rail yard
- Use of petroleum solvents associated with a machine shop

A Phase I ESA of the Site was completed 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 (UST) 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.

To determine whether RECs resulted in a release of petroleum and/or hazardous materials at the Site, a Phase II ESA was completed in July 2021. The Phase II ESA 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 polycyclic aromatic hydrocarbons (PAHs) at concentrations above 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.

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:

- The SSD pilot test indicated that this technology would be effective to mitigate vapor intrusion into the "L" building.
- PCE and naphthalene were not detected in soil vapor samples collected from the northern portion of the Site at concentrations exceeding non-resident regulatory standards.
- 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.
- 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). 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
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
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 support remedial design.

An inspection of Site buildings for lead was completed in August 2021. This assessment identified lead in amounts that will require lead safe construction practices on various building surfaces including wood clapboards, metal siding, wood trim, and a door.

Summary of Proposed Remedial Actions:

A Partial Corrective Action Plan (CAP) has been prepared for the Site that details remedial actions 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 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.

The Partial CAP was reviewed by the Vermont Department of Environmental Conservation (VT DEC) and is currently in a 30-day public comment period (May 5 to June 6, 2022).

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.

Key remedial actions to support the renovation and cleanup of the Site will include:

1. The installation of a sub-slab depressurization (SSD) system in the “L” building to mitigate vapor intrusion. It is anticipated that the SSD system will reduce sub-slab soil vapors where operation of this system is no longer required.

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 to prevent potential future discharges to the subsurface.
5. Implementation of an institutional control that requires operation of the SSD system until it can be demonstrated there is no longer a threat of vapor intrusion into the “L” building.

Community Background:

The Site is located in St. Johnsbury, Vermont. According to the *US Census Bureau's 2020 Demographic Profile*, the town of St. Johnsbury had a population of 7,364. The Town is approximately 36.39 square miles with a village in the south-central area. The Site is located approximately on the eastern portion of the village center. There are approximately 3,188 households, median age is 48.2, 91.4% of residents have graduated high school, and the median household income is \$41,182. The town contains an elementary, middle, and high schools, a post office, fire department, public library, police station, hospital, fifteen churches, and various retail businesses.

The predominant use of the area is residential and commercial, though agriculture remains prominent and there are many small, home-based businesses.

Chronology of Community Involvement:

To date, there have not been public meetings that address environmental contamination or proposed remedial actions at the Site.

Key Community Concerns:

Zion Growers has received numerous inquiries regarding the status of the Site from citizens that are eager to see renovations/redevelopment of the Site. To date, community members have not expressed environmental concerns.

Continued Community Involvement:

Dissemination of information to the public will be provided as updates to the Zion Growers website (<https://ziongrowers.com/>) as project milestones are completed.

A public meeting to discuss the Partial CAP will be held on May 27 at 5:00 p.m. at the St. Johnsbury Welcome Center. The Partial CAP is available for review on the State of Vermont's Environmental Notice Bulletin and can be found by entering the site number, 20204966, in the permit space. Additional opportunities for public comment will be

developed based on community interest and during remedial planning for soil and groundwater contamination associated with the former gasoline UST.