Architecture
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BL Companies

March 13, 2019

Mr. Michael J. Zambo, Ms. Erika Wiecenski
Town of Ashford, Town of Willington
5 Town Hall Road
Ashford, Connecticut 06278

RE: Phase I Environmental Site Assessment
The Cadlerock Property
Squaw Hollow Road
Ashford and Willington, Connecticut
BL Project No.18L6002

Dear Mr. Zambo and Ms. Wiecenski,

BL Companies, Inc. ("BL Companies") has performed a Phase I Environmental Site Assessment (ESA) of the property located at Squaw Hollow Road (Route 44) in Ashford, Windham County, Connecticut, and Boston Turnpike (Route 44) in Willington, Tolland County, Connecticut ("Site"). The approximately 351-acre property consists of 12 contiguous parcels identified on the Town of Ashford Tax Assessor's Map 43 as Lots 3, 6, 7, 8, 9, 10, 13, 14, 19, and 27; and on the Town of Willington Tax Assessor's Map 6 as Lots 11 and 11A. The Site is situated in an area of primarily residential and agricultural land usage. See Figure 1 (Site Location Map) and Figure 2 (Site Plan) attached.

This ESA was conducted in general accordance with the scope and limitations of the American Society for Testing and Materials (ASTM) E1527-13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", in accordance with the Connecticut Department of Energy and Environmental Protection (CTDEEP) Site Characterization Guidance Document (SCGD), and in accordance with BL Companies' contract dated May 22, 2018.

Attached is BL Companies' report ("Report") detailing the methods, findings, opinions, and conclusions of the assessment.

This assessment has revealed the following historical recognized environmental conditions (HRECs) in connection with the Site:

- A Supplemental Subsurface Investigation was conducted by GeoQuest in 2010 at the request of the CTDEEP to determine whether further remediation was necessary in the eastern and northern portions of the Northwest Disposal Area (NWDA) (Lot 11) in Willington. Sampling points were identified based on the levels of antimony reported by Weston Solutions, Inc. in a 2010 Removal Program Action Report. Based on the depth to bedrock encountered at 12 inches or less, 16 soil samples were collected from 0 to 6 inches and 6 to 12 inches whenever possible. Antimony was detected below Remediation Standards Regulations (RSRs) criteria in two of the soil samples analyzed. The report concluded that no further remediation was warranted in those portions of the NWDA.

  Subsequent correspondence from the CTDEEP to GeoQuest in 2011 served as an agreement that no further investigation was warranted beyond the perimeter of the NWDA; however, the CTDEEP requested that the antimony be evaluated in terms of potential ecological exposure pathways in proximity to regulated wetlands. An Ecological Study was conducted by GeoQuest in 2011 to address CTDEEP's concerns. According to the report, low concentrations of antimony were detected in soil samples collected from the NWDA (Lot 11); however, the investigation concluded that no further investigation or remediation was warranted based on the extensive remediation previously conducted, the concentrations of antimony detected were below RSR criteria in two samples analyzed, antimony is slightly soluble, and the distance from the wetlands to the soil with antimony detections made it unlikely for migration, antimony is not a carcinogen, and that remediation activities in the NWDA were successful in protecting the environment, specifically the wetlands. The CTDEEP accepted GeoQuest's analysis that there was unlikely adverse ecological effects to aquatic life from the antimony, and that no additional soil sampling or remediation was required.

This assessment has revealed the following recognized environmental conditions (RECs)/Areas of Concerns (AOCs) in connection with the Site:

- Based on previous investigations and documents on file with the Town of Ashford, the Town of Willington, and the CTDEEP, the Site has historically been utilized for solid waste disposal (Lots 3, 6, 7, 8, 9, 10, 11, 13, and 19) with wire burning activities on Lot 11. A CTDEEP lien was placed on Map 6, Block 11, Parcels 00 and 0A (Lot

11 in Willington) on May 6, 2010 and an EPA lien was placed on Lots 11 and 11A in Willington and Lots 8, 9, 10, 13, and 19 in Ashford on November 24, 2009. The liens are associated with environmental cleanup requirements, for which compliance has not been achieved.

- According to previous investigations, and on-Site observations, a man-made pond is located in the south-central portion of the Site on Lots 8, 9, and 10. Previous surface water sampling events did not detect any Contaminants of Concern (COCs) above RSR criteria; however, sediment samples were detected with chromium, nickel, and mercury exceeding the National Oceanic Atmospheric Administration (NOAA) Screening Quick Reference Table (SQuiRT) threshold limits..

This assessment has identified the following AOCs for the Site:

- AOC-5, AOC-6: The South-Central Disposal Area (SCDA) (Lots 6, 7, 8, 9, and 10 - Ashford): Previous investigations identified potential trenching for the burial of waste, a soil pile, metal debris, and a test pit.

- AOC-5: North of the SCDA (Lot 19 - Ashford): Several areas of stressed vegetation and/or exposed soil were identified through the drone photographs.

- AOC-2: The Northeast Disposal Area (NEDA) (Lot 13 - Ashford); This area was historically excavated and backfilled with materials of unknown origin. Limited investigations were conducted in this area.

- AOC-3: The North-Central Disposal Area (NCDA) (Lot 19 - Ashford): Materials identified in this area included a car engine, two car doors, remains of drums, metal debris, old appliances, drums, and a water heater. investigations were conducted in this area.

- AOC-7: Man-made pond (Lots 8, 9, and 10 - Ashford): Surficial solid waste was observed in this area. Aerial photographs from 1970 and 1986 show disturbed soil around the pond, specifically northwest of the pond. Aerial photographs from 1986 and 1997 show disturbed soil east and southeast of the pond. Sediment samples

were detected with chromium, nickel, and mercury exceeding the NOAA SQuiRT threshold limits.

- AOC-4: Moritz Pond (Lot 19): Historical reports indicate that there was a sand and gravel pit and evidence of dumping at the perimeter of Moritz Pond. Disturbed areas can be seen in the 1969 and 1970 aerial photographs at the northwest and east/southeast borders of the pond. Limited investigations were conducted in this area.

- AOC-1A, AOC-1B, AOC-1C: (Lots 11 and 11A - Willington), outside of the NWDA, have not been investigated in accordance with the CTDEEP Order.

This assessment has revealed the following business environmental risks (BERs)/de minimis conditions in connection with the Site:

- The presence of scrap metal debris observed in the NWDA (Lot 11).

- The presence of mapped and/or suspected wetlands on Lots 3, 6, 7, 8, 11, 13, and 19 of the Site.

Compliance with the Connecticut Transfer Act (CTA) is required when ownership of a Hazardous Waste Establishment is transferred, according to Connecticut General Statutes (CGS) sections 22a-134 to 22a-134e. An Establishment is any real property at which or any business operation from which (a) on or after November 19, 1980, there was generated, except as the result of remediation of polluted soil, ground water or sediment, more than one hundred kilograms of hazardous waste in any one month, (b) hazardous waste generated at a different location was recycled, reclaimed, reused, stored, handled, treated, transported or disposed of, (c) the process of dry cleaning was conducted on or after May 1, 1967, (d) furniture stripping was conducted on or after May 1, 1967, or (e) a vehicle body repair facility was located on or after May 1, 1967.

Based upon the information reviewed as part of this assessment, it is not clear if the any of the lots on the Site meet the requirements set forth in the CTA to be considered an "Establishment" due to historic Site operations including waste burial and wire burning and recovery activities. In addition, no hazardous waste manifests or hazardous waste

documentation was reviewed at the CTDEEP during this assessment that would indicate that the Site would be subject to the CTA. However, based on existing exemptions regarding the definition of a transfer under the Transfer Act, the Site would not likely be subject to the legal and technical requirements of the CTA in the event of a foreclosure and/or future sale by the Towns of Ashford and Willington.

This Phase I ESA was conducted under the supervision/responsible charge of an EP, as defined by ASTM E-1527-13. The interviews and Site reconnaissance portions of this assessment were performed by a person possessing sufficient training and experience necessary to conduct the interviews and Site reconnaissance, and having the ability to identify issues relevant to recognized environmental conditions (RECs) in connection with the Site. The attached Report includes documentation to support the analysis, opinions, and conclusions as presented.

Based on the findings of this ESA, BL Companies recommends completion of additional investigation of soil, groundwater, surface water and sediment in accordance with our proposed Sampling Plan that will be submitted under separate cover.

In addition, BL Companies recommends a legal opinion regarding the Site's status under the Connecticut Transfer Act.

BL Companies appreciates the opportunity to provide our environmental services to you. Should there be any questions regarding this Report, please do not hesitate to contact us.

Sincerely,
BL Companies, Inc.

Carol D. Smith
Project Scientist

Samuel R Haydock
Director, Client Relations and Business Development

BL Companies

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PHASE I ENVIRONMENTAL SITE ASSESSMENT

The Cadlerock Property

Squaw Hollow Road
Ashford and Willington, Connecticut
BL Project No. 18L6002

Prepared For:
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Report Date:
March 13, 2019

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1.0 EXECUTIVE SUMMARY

At the request of the Town of Ashford and the Town of Willington ("Client" or "User"), BL Companies, Inc. ("BL Companies") has completed a Phase I Environmental Site Assessment (ESA) of the property located at Squaw Hollow Road (Route 44) in Ashford, Windham County, Connecticut, and Boston Turnpike (Route 44), Tolland County, Connecticut ("Site").

This ESA was conducted in general accordance with the scope and limitations of the American Society for Testing and Materials (ASTM) E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", in accordance with the Site Characterization Guidance Document (SCGD) promulgated by the Connecticut Department of Energy and Environmental Protection (CTDEEP), and in accordance with BL Companies' contract dated May 22, 2018.

The purpose of the assessment was to evaluate and identify conditions indicative of recognized environmental conditions (RECs) as defined by the ASTM E1527-13 Standard and areas of concern (AOCs) as defined by the CTDEEP SCGD.

The Site is located on Squaw Hollow Road in Ashford, Windham County, Connecticut and Boston Turnpike (Route 44) in Willington, Tolland County, Connecticut. The approximately 351-acre property consists of 12 contiguous parcels identified on the Town of Ashford Tax Assessor's Map 43 as Lots 3, 6, 7, 8, 9, 10, 13, 14, 19, and 27; and on the Town of Willington Tax Assessor's Map 6 as Lots 11 and 11A. Lot 11 in Willington and Lots 7, 8, 9, and Lot 19 are currently utilized for agriculture and Lots 3, 6, 7, portions of Lot 8, 10, 13, 19, and 27 are predominantly undeveloped woodland, wetlands, and open meadows. The Site is situated in an area of primarily residential and agricultural land usage. Figure 1 (Site Location Map) and Figure 2 (Site Plan) are attached.

According to historical sources and previous investigations, a former residence with an attached barn, which was occupied by a tractor sales and service operation, and an additional structure utilized as a restaurant and novelty store were present on the Site (Lots 7, 8, and 9) until approximately 1980. The restaurant and store were reportedly destroyed by fire in 1980 and razed in 1990. The buildings utilized a septic system and leach fields located north of the structures (Lots 7, 8, and 9). Stormwater drainage systems were present on Lots 7, 8, and 9 during a 1992 Site inspection, which reportedly discharged to the man-made pond on the Site. A structure in the central portion of the Site (Lot 8) was reportedly associated with a former golf driving range operation; a scrap metal operation was conducted in the south-central portion of the property (Lots 7 and 8). Reportedly, unauthorized wire burning activities were

conducted in the west-central and south-central portions of the property (Lot 11). Moritz Pond (Lots 8 and 13), which consists of 8 acres surrounded by wetlands, and a man-made pond (Lots 8, 9, and 10) consisting of approximately 1 acre, are located in the southeastern portion of the property. Several small, intermittent streams are situated in low-lying areas of the property.

As described in Sections 4.3, 6.5, and 7.4, the Site has undergone environmental investigation and remediation from approximately 1992 through 2013. The Site was identified in the EDR database search as a Superfund Site. In addition, off-Site facilities with USTs and/or activities involving the generation of hazardous waste were identified in close proximity to the Site; however, none of the facilities were identified on any release-type databases (e.g., CERCLIS, LUST, VCP, Brownfields, etc.). Although the Site has a history of impacts to soil and/or groundwater from past dumping and wire-burning activities, based on the previous investigation and remediation activities conducted at the Site, VOCs at concentrations with the potential to create vapor intrusion have not been identified at the Site, and there does not appear to be a the potential for subsurface vapor conditions. One structure is located on Lot 7 as part of the former driving range; however, the condition of the building is substandard and uninhabitable.

Based on the information presented in this Report, it is the opinion of BL Companies that no *significant* data gaps were encountered during completion of this assessment.

This assessment has revealed the following historical recognized environmental conditions (HRECs) in connection with the Site:

- A Supplemental Subsurface Investigation was conducted by GeoQuest in 2010 at the request of the CTDEEP to determine whether further remediation was necessary in the eastern and northern portions of the NWDA (Lot 11). Sampling points were identified based on the levels of antimony reported by Weston Solutions, Inc. in a 2010 Removal Program Action Report. Based on the depth to bedrock encountered at 12 inches or less, 16 soil samples were collected from 0 to 6 inches and 6 to 12 inches whenever possible. Antimony was detected below RSR criteria in two of the soil samples analyzed. The report concluded that no further remediation was warranted in those portions of the NWDA.

  Subsequent correspondence from the CTDEEP to GeoQuest in 2011 served as an agreement that no further investigation was warranted beyond the perimeter of the NWDA. The CTDEEP requested that the antimony be evaluated in terms of potential ecological exposure pathways in proximity to regulated wetlands. An Ecological Study was conducted by GeoQuest in 2011 to address CTDEEP's

concerns. According to the report, low concentrations of antimony were detected below RSR criteria in soil samples collected from Lot 11 of the NWDA; however, the investigation concluded that no further investigation or remediation was warranted based on the extensive remediation previously conducted. Antimony is slightly soluble, and the distance from the wetlands to the soil with antimony detections made it unlikely for migration. GeoQuest concluded that antimony is not a carcinogen, and that remediation activities in the NWDA were successful in protecting the environment, specifically the wetlands. The CTDEEP accepted GeoQuest's analysis that there was unlikely adverse ecological effects to aquatic life from the antimony, and that no additional soil sampling or remediation was required.

This assessment has revealed the following recognized environmental conditions (RECs)/AOCs in connection with the Site:

- Based on previous investigations and documents on file with the Town of Ashford, the Town of Willington, and the CTDEEP, the Site has historically been utilized for solid waste disposal (Lots 3, 6, 7, 8, 9, 10, 11, 13, and 19) with wire burning activities on Lot 11. A CTDEEP lien and an EPA lien are in place associated with environmental cleanup requirements, for which compliance has not been achieved.

- According to previous investigations, and observations made, a man-made pond is located in the south-central portion of the Site on Lots 8, 9, and 10. Previous surface water sampling events did not detect any COCs above RSR criteria; however, sediment samples had detections of chromium, nickel, and mercury exceeding the NOAA Screening Quick Reference Table (SQuiRT) threshold limits.

This assessment has identified the following areas of concern (AOCs) for the Site:

- AOC-1A, AOC-1B, AOC-1C: Lot 11, outside of the NWDA, and Lot 11A have not been investigated in accordance with the CTDEEP Order.

- AOC-2: The NEDA (Lot 13 - Ashford); This area was historically excavated and backfilled with materials of unknown origin. Limited investigations were conducted in this area.

- AOC-3: The NCDA (Lot 19 - Ashford): Materials identified in this area included a car engine, two car doors, remains of drums, metal debris, old appliances, drums, and a water heater. Investigations were conducted in this area.

- AOC-4: Moritz Pond (Lot 19): Historical reports indicate that there was a sand and gravel pit and evidence of dumping at the perimeter of Moritz Pond. Disturbed areas can be seen in the 1969 and 1970 aerial photographs at the northwest and east/southeast borders of the pond. Limited investigations were conducted in this area.

- AOC-5: North of the SCDA (Lot 19 - Ashford): Several areas of stressed vegetation and/or exposed soil were identified through the drone photographs.

- AOC-5, AOC-6: The SCDA (Lots 6, 7, 8, 9, and 10 - Ashford): Previous investigations identified potential trenching for the burial of waste, a soil pile, metal debris, and a test pit.

- AOC-7: Man-made pond (Lots 8, 9, and 10 - Ashford): Surficial solid waste was observed in this area. Aerial photographs from 1970 and 1986 show disturbed soil around the pond, specifically northwest of the pond. Aerial photographs from 1986 and 1997 show disturbed soil east and southeast of the pond. Sediment samples had detections of chromium, nickel, and mercury exceeding the NOAA SQuiRT threshold limits.

This assessment has revealed the following business environmental risks (BERs)/de minimis conditions in connection with the Site:

- The presence of scrap metal debris observed in the NWDA (Lot 11).

- The presence of mapped and/or suspected wetlands on Lots 3, 6, 7, 8, 11, 13, and 19 of the Site.

Compliance with the Connecticut Transfer Act (CTA) is required when ownership of a Hazardous Waste Establishment is transferred, according to Connecticut General Statutes (CGS) sections 22a-134 to 22a-134e. An Establishment is any real property at which or any business operation from which (a) on or after November 19, 1980, there was generated, except as the result of remediation of polluted soil, ground water or sediment, more than one hundred kilograms of hazardous waste in any one month, (b) hazardous waste generated at a different location was recycled, reclaimed, reused, stored, handled, treated, transported or disposed of, (c) the process of dry cleaning was conducted on or after May 1, 1967, (d) furniture stripping was conducted on or after May 1, 1967, or (e) a vehicle body repair facility was located on or after May 1, 1967.

Based upon the information reviewed as part of this assessment, it is not clear if the any of the lots on the Site meet the requirements set forth in the CTA to be considered an "Establishment" due to historic Site operations including waste burial and wire burning and recovery activities. In addition, no hazardous waste manifests or hazardous waste documentation was reviewed at the CTDEEP during this assessment that would indicate that the Site would be subject to the CTA. However, based on existing exemptions regarding the definition of a transfer under the Transfer Act, the Site would not likely be subject to the legal and technical requirements of the CTA in the event of a foreclosure and/or future sale by the Towns of Ashford and Willington.

BL Companies recommends completion of additional investigation of soil, groundwater, surface water and sediment in accordance with our proposed Sampling Plan that will be submitted under separate cover.

In addition, BL Companies recommends a legal opinion regarding the Site's status under the Connecticut Transfer Act.

2.1 Purpose

At the request of the Town of Ashford and the Town of Willington ("Client" or "User"), BL Companies, Inc. ("BL Companies") has completed a Phase I Environmental Site Assessment (ESA) of the property located at Squaw Hollow Road (Route 44) in Ashford, Windham County, Connecticut, and Boston Turnpike (Route 44) in Willington, Tolland County, Connecticut ("Site").

This ESA was conducted in general accordance with the scope and limitations of the American Society for Testing and Materials (ASTM) E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", in accordance with the Site Characterization Guidance Document (SCGD) promulgated by the Connecticut Department of Energy and Environmental Protection (CTDEEP), and in accordance with BL Companies' contract dated May 22, 2018.

The purpose of the assessment was to evaluate and identify conditions indicative of recognized environmental conditions (RECs) as defined by the ASTM E1527-13 Standard and Areas of Concern (AOCs) as defined by the CTDEEP SCGD.

2.2 Standard Scope of Services

In general, the scope of this ESA included gathering information regarding: (1) current and past property uses and occupancies; (2) current and past uses of hazardous substances and/or petroleum products; (3) waste management and disposal activities; (4) current and past corrective actions and response activities at the Site; (5) engineering and/or institutional controls at the Site; and (6) adjoining and surrounding properties. BL Companies obtained this information through:

- Interviews with readily-available people knowledgeable about the Site;
- Review of reasonably-ascertainable historical record sources;
- Review of federal, state, tribal and local government records; and
- Visual observations of the Site and portions of the surrounding properties.

BL Companies also reviewed database listings to identify potential sources of impact via soil vapor migration. A Vapor Encroachment Screening, as defined in ASTM E-2600-10 "Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions", is outside the scope of this Phase I ESA, and therefore, was not performed. The review of database listings completed for this ESA to identify

potential subsurface vapor concerns at the Site is not intended to fulfill the requirements of ASTM E-2600-10, and does not constitute a Tier 1 Vapor Encroachment Screening. Based on this review, there does not appear to be a the potential for subsurface vapor conditions at the Site.

This Phase I ESA was conducted under the supervision/responsible charge of an environmental professional (EP), as defined by ASTM E-1527-13. The interviews and Site reconnaissance portions of this assessment were performed by a person possessing sufficient training and experience necessary to conduct the interviews and Site reconnaissance, and having the ability to identify issues relevant to RECs in connection with the Site. This Report includes documentation to support the analysis, opinions, and conclusions as presented.

Deviations from (or exceptions to) the ASTM E-1527-13 standard of practice, as well as data gaps encountered during the course of this assessment, are discussed in Sections 2.4 and 11.0 of this report. Limitations of this assessment are described in Section 13.0.

2.3 Additional Services

No additional services outside of the scope of the ASTM E1527-13 Standard or SCGD were performed as part of this assessment.

2.4 Deviations

ASTM E1527-13 characterizes issues which are beyond the scope of assessment as non-scope considerations. Any inclusion of these issues or considerations in this assessment is discussed in Section 2.3 above.

ASTM E1527-13 allows written interview of property owners and occupants, but is structured in a way which promotes oral interview of state and/or local government officials. Nonetheless, many state and governmental officials will provide information only upon receipt of written requests submitted under the Freedom of Information Act (FOIA). Information requested or received as a result of such requests may be employed in this assessment in lieu of oral interview of state and local government officials.

Other limiting conditions/deviations from ASTM E1527-13 are identified in Section 11.0 as data failures and/or data gaps.

2.5 Terminology

Recognized Environmental Condition (REC) - "the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to any release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment."

Historical Recognized Environmental Condition (HREC) - "a past release of any hazardous substances or petroleum products that has occurred in connection with the property and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the property to any required controls (for example, property use restrictions, Activity Usage Limitations (AULs), institutional controls, or engineering controls). Before calling the past release an HREC, the EP must determine whether the past release is a REC at the time the Phase I ESA is conducted (for example, if there has been a change in the regulatory criteria)."

Controlled Recognized Environmental Condition (CREC) - "a REC resulting from a past release of hazardous substances or petroleum products that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a No Further Action (NFA) letter or equivalent, or meeting risk-based criteria established by a regulatory authority), with hazardous substances or petroleum products allowed to remain in place subject to the implementation of required controls (for example, property use restrictions, AULs, institutional controls, or engineering controls)."

Business Environmental Risk (BER) - "a risk which can have a material environmental or environmentally-driven impact on the business associated with the current or planned use of a parcel of commercial real estate, not necessarily limited to those environmental issues required to be investigated in this practice."

De minimis Condition - "a condition that generally does not present a threat to human health or the environment and that generally would not be the subject of an enforcement action if brought to the attention of appropriate governmental agencies." Conditions determined to be de minimis are not RECs nor CRECs.

Area of Concern - "locations or areas at a site where hazardous waste and/or hazardous substances ...have been or may have been used, stored, treated, handled, disposed, spilled, and/or released to the environment".

Environmental Professional (EP) - "a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgement to develop opinions and conclusions regarding AOCs as defined by the SCGD and conditions indicative of releases or threatened releases (see 40 CFR 312.1 (c)) on, at, in, or to a property, sufficient to meet the objectives and performance factors in 40 CFR 312.20(e) and (f)."

2.6 User Reliance

Consultant agrees, subject to the terms and conditions contained herein, that the following parties (Relying Parties), may rely on the contents of the Report as if the Report had been expressly prepared for the Relying Parties. The Relying Parties are:

Connecticut Department of Energy and Environmental Protection (CTDEEP)
Connecticut Department of Economic and Community Development (CTDECD)

The Relying Parties may rely on the Report to the same extent that the Client may rely on the Report. The Relying Parties may rely on the Report subject to (a) the limitations contained in the Report (b) the terms and conditions contained in the contract between Client and Consultant pursuant to which Consultant prepared the Report (c) the limitations contained in the applicable standards referenced in the report and (d) the fact that the Report was prepared for the use of the Client only and was not prepared for the purpose of being relied on by the Relying Parties.

3.1 General Site Description and Operations

The Site is located on Squaw Hollow Road (Route 44) in Ashford, Windham County, Connecticut and Boston Turnpike (Route 44) in Willington, Tolland County, Connecticut. The approximately 351-acre property consists of 12 contiguous parcels identified on the Town of Ashford Tax Assessor's Map 43 as Lots 3, 6, 7, 8, 9, 10, 13, 14, 19, and 27; and on the Town of Willington Tax Assessor's Map 6 as Lots 11 and 11A. Lot 11 in Willington and Lots 7, 8, 9, and Lot 19 are currently utilized for agriculture, and Lots 3, 6, 7, portions of Lot 8, 10, 13, 19, and 27 are predominantly undeveloped woodland, wetlands, and open meadows. The Site is situated in an area of primarily residential and agricultural land usage. Figure 1 (Site Location Map) and Figure 2 (Site Plan) are attached.

Site Details	
Street Address	Squaw Hollow Road
Municipality	Ashford and Willington
County	Windham and Tolland
State	Connecticut
Zip Code	
Tax Parcel Number(s)	43/A/3 (Lot 3), 43/A/6 (Lot 6), 43/A/7 (Lot 7), 43/A/8 (Lot 8), 43/A/9 (Lot 9), 43/A/10 (Lot 10), 43/A/13 (Lot 13), 43/A/14 (Lot 14), 43/A/19 (Lot 19), 43/A/27 (Lot 27), 6-011-00 (Lot 11), 6-011-0A (Lot 11A)
Site Area	351.59 acres
Number of Buildings	One abandoned structure observed
Size of Building(s)	Unknown
Current Site Occupant(s)	Not applicable (vacant land with agricultural fields and wooded, undeveloped areas)
Current Site Owner(s)	Cadlerock Properties, Joint Ventures, LP (Lots 3, 6, 7, 9, 10, 13, 14, 19, 27 (Ashford) Lots 11 and 11A (Willington), Cadle Properties of Connecticut (Lot 8, Ashford) based on online property data
Method of Heat	Not applicable
Potable Water Supply	No public water available
Sewage Disposal	No public system available
Natural Gas	Not applicable
Electric	Eversource serving area

3.2 Structures, Roads, and Other Improvements

Historically, the Site contained a residence, a barn, a restaurant with a novelty shop, a tractor dealership, and a golf driving range on Lots 7, 8 and 9 in Ashford. A structure associated with the driving range remains on Lot 7; however, the condition of the building is substandard and uninhabitable.

A scrap metal operation was formerly located on Lots 3 and 6 in Ashford, and Lot 11 in Willington, in the south-central portion of the Site. Reportedly, unauthorized wire burning activities were conducted on Lot 11 in the west-central and south-central portions of the Site. Moritz Pond, located on Lot 19, consists of 8 acres surrounded by wetlands located on Lots 8 and 13. A man-made pond containing approximately 1

acre, is located on Lots 8, 9, and 10, in the south-central portion of the Site. Several small, intermittent streams are situated in low-lying areas of the Site.

3.3 Current Uses of Adjoining and Surrounding Properties

The area surrounding the Site consists of the following:

Direction	Adjacent Land Use	Surrounding Land Use
North	Undeveloped land	Undeveloped
South	Squaw Hollow Road, residential properties	Squaw Hollow Road, undeveloped land, residential properties
East	Residential properties, undeveloped land	Undeveloped land, residential properties
West	Undeveloped land	Undeveloped

4.1 User Questionnaire

BL Companies provided the Client with a User Questionnaire to obtain information regarding:

- Whether the User has searched for any environmental liens against the Site or is aware of any AULs that have been filed or recorded in reference to the Site;
- Whether the User has any specialized knowledge of the Site and/or the adjoining properties or any relevant experience that would enable the User to identify conditions indicative of releases or threatened releases at the Site;
- Whether the User believes that the purchase price may reflect the presence of contamination at the Site;
- Whether the User has taken into account any commonly known or reasonably ascertainable information about the Site;
- Whether the User has encountered any obvious signs or evidence of contamination at the Site while gathering information for the Phase I ESA; and
- The reason the User is requesting the completion of a Phase I ESA for the Site.

ASTM E1527-13 defines these inquires as "User's responsibilities". To the extent that the Client chose not to provide information requested by the Questionnaire to BL Companies, the absence of such information may be identified as a data gap in this Report. To the extent the Client has performed the additional inquiry(ies) itself and has provided that information on the Questionnaire, BL Companies has relied on the thoroughness and reliability of the Client's information.

A copy of the User Questionnaire is attached (see Appendices).

The following subsections summarize the information provided in the User Questionnaire:

4.1.1 Environmental Liens

The User was aware of environmental cleanup liens against the Site that are filed or recorded under federal, tribal, state, or local law. According to the User, liens associated with the Connecticut Department of Energy and Environmental Protection (CTDEEP) and the United States (US) Environmental Protection Agency (EPA) are

recorded on the land records. Site investigation, remediation, and removal response actions are recorded on the land records/deeds.

4.1.2 AULs

The User was not aware of any AULs against the Site that are filed or recorded under federal, tribal, state, or local law. Furthermore, the Client did not request that BL Companies perform an AUL search as part of this ESA. However, CTDEEP Order No. SRD-088 issued August 15, 1997 required the property owner (Cadlerock Properties Joint Venture, L.P.) to secure the Site from unauthorized vehicular entry, to remove all solid wastes from the Site to a lawfully-operated solid waste facility, to investigate the existing and potential extent and degree of soil, groundwater and surface water pollution on or emanating from the Site, to undertake remedial actions to abate such pollution, and to monitor the effectiveness of those remedial actions.

4.1.3 Specialized Knowledge

The User did not have any specialized knowledge or experience related to the Site or nearby properties.

4.1.4 Valuation Reduction for Environmental Issues

No response was provided for the valuation reduction inquiry.

4.1.5 Commonly Known or Reasonably Ascertainable Information

No response was provided for the commonly known or reasonably ascertainable inquiry.

4.1.6 Obvious Signs of Contamination

Based on previous investigations, areas of the Site (Lots 3, 6, 7, 8, 9, 10, 11, and 19) are documented with areas of disturbance, buried debris, and/or known environmental contamination.

4.2 Reason For Performing Phase I ESA

The User's response indicated that the completion of an ESA of the Cadlerock properties would provide the Towns of Ashford and Willington with the information needed to determine whether to pursue the taking of the properties either through tax sale or foreclosure of tax liens. The intention of both Towns is to eventually return these properties to productive use. The environmental professional has been given access to documentation relating to the properties that is in the possession of the Towns.

4.3 Previous Investigations

Previous environmental assessment reports relative to the Site were provided to BL Companies during the preparation of this Phase I ESA. The reports are summarized below, and copies of the reports are included in the Previous Investigations Appendix.

Hazardous Materials Preliminary Site Assessment (PSA), Route 44, Squaw Hollow Road, Ashford and Willington, Connecticut, prepared for Connecticut National Bank, prepared by Rizzo Associates (Rizzo), March 23, 1992. In 1992, Rizzo Associates, Inc. (Rizzo) was retained by Connecticut National Bank to conduct a Hazardous Materials Preliminary Assessment on the Site. The report indicates that access to the Site was available from three paved entrance aprons along Route 44 at the intersection of Howard Road. In addition, a "paper street" was located in the northeastern section of the Site for emergency services.

According to the report, a former residence maintained an attached barn, which was occupied by a tractor sales and service operation and situated on Lots 7, 8, and 9. An additional structure, adjacent to the residence, was occupied by a restaurant and novelty store until approximately 1980. The restaurant and store were reportedly destroyed by fire in 1980 and razed in 1990. The buildings reportedly utilized a septic system, with leach fields located north of the buildings. At the time of the inspection, stormwater drainage systems were present, which reportedly discharged to a man-made pond (Lots 8, 9, and 10) on the Site. A structure in the central portion of the Site (Lot 7) was reportedly associated with a former golf driving range operation. During a Site reconnaissance conducted by Rizzo, large areas of disturbed soil were discovered in the vicinity of the former residence and barn, in the south-central portion of the Site.

During the PSA, conditions across the Site were reported with discolored soil (Lot 11), a 500-gallon fuel oil aboveground storage tank (AST) on Lot 8, several 55-gallon drums on Lots 7 and 8, a small gravel pit (Lot 19), several backfilled test pits and standpipes (Lots 7 and 8), an approximate 2-acre filled and graded area in the northwest portion of the Site (Lot 11), and construction debris (Lot 19).

The report indicated that prior to the PSA conducted by Rizzo, the CTDEEP had conducted area well sampling from approximately 12 residential parcels adjoining the Site. The water samples detected elevated levels of iron and manganese; however, it was determined that the concentrations were consistent with naturally occurring levels, and not associated with Site activities.

In addition, the report stated that the Site had been targeted for investigation by the CTDEEP since 1991 due to complaints of potentially radioactive waste disposal from the University of Connecticut; however, this information was not confirmed. Based on a conversation with a CTDEEP employee involved in the Cadlerock case, the department's radiation program historically screened the Site for radioactive material, which was not encountered. Therefore, no evidence has been obtained to substantiate the anecdotal concern regarding disposal of radioactive waste on the Site.

According to the PSA, records reviewed indicated that the Ashford Conservation Commission had observed three trench excavations on the Site (location not identified) that were reportedly filled with an unknown material. An investigation was subsequently conducted by the CTDEEP, in which surface soil, pond sediment, and surface water samples were collected. Lead was detected in soil in the northwest portion of the Site at concentrations exceeding regulatory standards. All other parameters of samples analyzed were below regulatory criteria. Recommendations included the removal of the on-Site fuel oil AST on Lot 8, a subsurface investigation to define the extent and degree of lead contamination identified in the northwestern portion of the Site, and a geophysical survey in areas of disturbed soil.

Level 2 ESA, Route 44, Squaw Hollow Road, Ashford and Willington, Connecticut, prepared for Shawmut Bank, prepared by Rizzo Associates (Rizzo), April 24, 1994. During the Level 2 ESA, 8 soil borings (SS-1 through SS-8 - Figure 2 of the report), 28 test pits (TP-1 through TP-28 - Figure 2), and 10 groundwater monitoring wells (RIZ-1 through RIZ-10, Figures 3 and 4) were completed in the northwest portion (Lot 11) and south-central (Lots 7 and 8) portion of the Site. Depth to bedrock was reported as 3 to 10 feet below grade (fbg) and depth to groundwater was approximately 9 fbg. Five monitoring wells (RIZ-1 through RIZ-5) were installed in the northwestern portion of the Site (Figure 3), and 5 monitoring wells (RIZ-6 through RIZ-10) were completed in the south-central portion of the Site (Figure 4). The wells were installed to depths ranging from 18 to 25 fbg. A total of 15 soil samples were submitted for analysis for volatile organic compounds (VOCs), Resource Conservation and Recovery Act (RCRA) 8 metals, total petroleum hydrocarbons (TPH), and/or polychlorinated biphenyls (PCBs). Barium, cadmium, lead, and silver were detected at concentrations exceeding regulatory criteria, and elevated concentrations of TPH were detected in the soil samples analyzed. No VOCs or PCBs were reported in the soil samples analyzed. Low levels of barium, toluene, and TPH were detected in all of the groundwater samples analyzed. The Level 2 ESA concluded that the primary contaminant of concern in the northwest portion of the Site was lead and the primary contaminant of concern in the south-central portion of the Site was determined to be TPH.

Preliminary Damage Analysis for Properties Located at 392 and 460 Squaw Hollow Road, Ashford and Willington, Connecticut, prepared for The Cadle Company, prepared by HRP Associates, Inc. (HRP). The report notes that soils in the Northwest Disposal Area (NWDA), identified as Lot 11, were contaminated with levels of barium, cadmium, lead, silver, mercury, and copper exceeding the Remediation Standards Regulations (RSRs) criteria. Copper and leachable lead were detected in surficial soils, with levels of lead concentrations determined to be hazardous. In addition, TPH was detected at concentrations below RSR criteria. The report indicated that soils in the South-Central Disposal Area (SCDA), identified as Lots 6, 7, 8, 9, and 10, were historically contaminated with TPH, lead, and mercury exceeding RSR criteria. The report states that historical groundwater sampling conducted by Rizzo in 1993 and previous sampling by the CTDEEP detected low levels of petroleum hydrocarbons at Lot 11 (NWDA). However, groundwater sampling conducted by HRP in 1999 did not detect any groundwater contamination.

According to the report, wire burning activities on Lot 11 generated ash, which was removed on a regular basis to reclaim copper. Contaminants of concern (COCs) on Lot 11 and Lots 6, 7, 8, 9, and 10 were identified by HRP as lead, copper, solvents, and petroleum hydrocarbons and associated VOCs and semi-volatile organic compounds (SVOCs). HRP stated that the investigation and remediation activities to date did not adequately define the extent and degree of soil and groundwater contamination and that additional investigation and remediation and solid waste disposal activities were necessary for the Site. The report includes a cost estimate for the scope of work required.

Geophysical Investigation, Cadlerock Properties, prepared by Lockheed Martin, March 9, 2009. This investigation was conducted by Lockheed Martin Response Engineering and Analytical Contract (REAC) in consultation with the EPA Work Assignment Manager (WAM) personnel in September and October 2008, as well as February 2009. A time-domain electromagnetic (TDEM) method was employed with a ground penetrating radar (GPR) system to confirm and refine the locations of anomalies identified, which included surface metal throughout the Site, a potential UST and a 55-gallon drum on Lot 7, Lot 8, or potentially Lot 9.

Copies of these documents are included in the Supporting Documentation Appendix. Additional reports and correspondence regarding investigation and remediation of the parcels are discussed in Sections 6.5 and Sections 7.4.

5.1 Geology

Geologically, the Site is located in the Eastern Uplands Physiographic Province of Connecticut and is underlain by the Bigelow Brook Formation, characterized by gray, medium-grained, well-layered granofels (Rogers, 1985). During previous investigations, depth to bedrock was reported as 3 to 10 feet below grade (fbg). Small bedrock outcrops were observed on Lot 19 during the Site reconnaissance.

5.2 Soils

According to the Environmental Data Resources (EDR) GeoCheck Physical Setting Source Addendum of a Radius Map report reviewed by BL Companies, soils mantling the Site are classified as Canton and Charlton fine sandy loams, well drained; Ridgebury, Leicester, and Whitman soils, poorly drained; Woodbridge fine sandy loam, moderately well drained; Catden and Freetown soils, very poorly drained; Timakwa muck and Natchaug soils, very poorly drained; and Paxton and Montauk fine sandy loams, well drained.

5.3 Topography and Hydrogeology

According to the USGS 7.5-Minute Topographic Map of Spring Hill, Connecticut and the EDR database report, the Site ranges in elevation from approximately 540 to 620 feet above mean sea level. Topography in the northwestern portion of the Site generally slopes to the south-southeast towards Moritz Pond, located in the southeastern portion of the Site. According to online CTDEEP mapping, groundwater beneath the Site is characterized as GAA. The GAA classification indicates that the Site is within the area of influence of private and/or public water supply wells and is presumed suitable for direct human consumption without treatment. Also according to CTDEEP mapping, the Site is not located within an Aquifer Protection Area. Based on previous investigations, groundwater in the south and central portions of the Site was calculated to flow in a northeasterly direction, while the groundwater in the northwest portion of the Site flows in a southeasterly direction.

The usage history of the Site has been reconstructed from reasonably-ascertainable, standard historical sources deemed "likely to be useful" by the EP and reviewed as part of this assessment. Standard historical sources include, but may not be limited to, topographic maps, aerial photographs, Sanborn Fire Insurance Maps, city street directories, property tax files, recorded land title records, building department records, and zoning/land use records. These historical records were provided by Environmental Data Resources, Inc. (EDR). Copies of the historical documentation reviewed during this assessment are included in the Historical Documentation Appendix.

6.1 Topographic Maps

A review of available historical topographic maps revealed the following:

Date	Site	Surrounding Area
1892	The Site appears undeveloped.	Area properties appear sparsely developed.
1915,1921	The Site appears similar to the previous map.	Area properties appear similar to the previous map.
1943	Moritz Pond appears in the southeastern portion of the Site, and an intermittent stream in the central portion of the Site appears to flow to the pond. Several low-lying areas are visible on the westernmost Site boundary.	Area properties appear similar to the previous map.
1945	The Site appears similar to the previous map.	Area properties appear similar to the previous map.
1953,1970,1983	The Site appears similar to the previous map.	Area properties appear with increased development.
2012	This map only shows topography and roadways; other improvements (if present) are not depicted.	This map only shows topography and roadways; other improvements (if present) are not depicted.

6.2 Aerial Photographs

A review of available historical aerial photography revealed the following:

Date	Site	Surrounding Area
1941	The southwestern-most portion of the Site (Lots 11A and Lot 3) appears with agricultural use. Moritz Pond is visible on Lots 8 and 13 of the Site. An additional, cleared area is visible directly north of the pond. A residential structure and outbuildings appear on the southern Site boundary on Lots 7 and 8, along Squaw Hollow Road. The remaining area of the Site (Lots 6, 10, and 19) appears undeveloped and forested.	Surrounding properties appear with several residential structures and agricultural fields, as well as undeveloped areas.
1951	Additional agricultural use appears along the southern Site boundary (Lots 7 and 8), extending to the central and eastern portions.	Area properties appear similar to the previous photograph.

Date	Site	Surrounding Area
1959	The Site appears with a regrowth of vegetation in Lots 7 and 8 of the agricultural portions. An unpaved road appears at the rear of the residential structure on Lot 8, leading to a road along a cultivated field to the west (Lot 7), extending northward to Lot 11.	Area properties appear similar to the previous photograph; however, an additional residential structure appears adjacent to the east on the southern Site boundary.
1963	Several vehicles and/or machinery appear along the western boundary, on the northern edge of the western field (Lot 11). A cleared area of exposed soil appears at the rear of the residential structure on Lot 8.	An additional residential structure appears on an adjacent property to the south, and across Squaw Hollow Road.
1969	An additional structure appears adjacent to the residential dwelling, and appears to be for commercial use. Debris is visible adjacent to the cleared area in the vicinity of the residential dwelling, as well as the area north of the cultivated field, where vehicles and/or machinery were noted on the previous photograph (Lot 11). The road extends farther north on Lot 11, to a cleared area where additional debris is visible.	Area properties appear similar to the previous photograph.
1970	The Site appears similar to the previous photograph.	Area properties appear similar to the previous photograph.
1986	Large cleared areas appear on the southwestern and western Site boundaries (Lots 11, 11A), and in the south-central portion at the rear of the residential structure (Lots 7 and 8). Debris appears to remain in the northern area on the western boundary (Lot 11). What appears to be stockpiled soil is visible in the northern portion of the south-central clearing (lots 7 and 8). Various unpaved roads or trails appear to span the Site from Moritz Pond (Lot 8) to the northwestern debris area in Lot 11. The cleared area north of Moritz Pond (lot 19) appears with debris. An additional pond appears to have been constructed northeast of the residential structure (Lots 8. 9, and 10).	Area properties appear with increased development. Several man-made ponds appear on properties south of the Site.
1991	The residential and commercial structures on the southern Site boundary (Lots 7 and 8) appear to have been razed and the man-made pond (Lots 8, 9, and 10) appears larger. No obvious activity appears on the Site.	Area properties appear similar to the previous photograph.
1997	The Site appears similar to the previous photograph.	Area properties appear similar to the previous photograph.
2005	The majority of the cleared, exposed portions of the Site (Lots 7, 8, 11, and 11A) appear with a regrowth of vegetation; however, the three areas identified with debris (Lot 11) remain devoid of vegetation. Portions of the original access road in the western section of the Site (Lots 3 and 11) are	Area properties appear with increased development.

Date	Site	Surrounding Area
	perceptible, and the constructed pond (lots 8, 9, and 10) remains visible.	
2008	The Site appears similar to the previous photograph; however, the vegetation on the access road (Lot 11A and Lot 11) does not appear, indicating active travel on the road. The northeastern disposal area (Lot 11) appears with some regrowth of vegetation.	Area properties appear similar to the previous photograph.
2012, 2016	The Site appears similar to the previous photograph.	Area properties appear similar to the previous photograph.

6.3 Sanborn Fire Insurance Maps

According to EDR, the complete holdings of the Sanborn Library, LLC collection have been searched based on supplied Site location information, and fire insurance maps covering the Site were not found.

6.4 City Street Directories

According to the EDR City Directory report, the Site is not listed within the researched directories.

Off-Site Listings

According to the EDR City Directory report, adjacent and/or nearby surrounding properties were identified as various residential and commercial listings. No listings of obvious environmental concern were identified in the directories reviewed.

6.5 Municipal/County Records

According to online tax assessment information reviewed, the Site is currently owned by Cadlerock Properties Joint Ventures, LP (Lots 3, 6, 7, 9, 10, 13, 14, 19, 27 (Ashford) and Lots 11 and 11A (Willington), Cadle Properties of Connecticut owns Lot 8 in Ashford. Lots 3, 6, 7, 9, 10, 13, 14, 19, and 27 were obtained in 1997 from Cadle Properties and Lot 8 was obtained in 1996 from Ashford Development. Lots 11 and 11A were obtained in 2002 from Pumpkin-Bebbington, LLC. The Site is zoned in the Residential-Agricultural (RA) District of Ashford and the Designed Recreation (DR) District of Willington. Full chain-of-title information was not researched as part of this assessment. For the purposes of this summary, the Connecticut Department of Environmental Protection (CTDEP) is referenced in the documents reviewed, which is now known as the CTDEEP, and is cited as such below. Information obtained from the municipal offices is summarized as follows:

Pollution Abatement Order SRD-088, Cadlerock Properties, CTDEEP, August 15, 1997. The Order was issued to Cadlerock Properties Joint Venture, L. P., Site owner, citing the following findings for Lots 3, 6, 7, 8, 9,10, 11, 13, and 19:

- Solid waste in excess of 10 cubic yards was disposed of without a permit;
- Unauthorized wire-burning and metal recovery activities with solid waste disposal conducted on the Site;
- Soil pollution consisting of heavy metals, VOCs, and petroleum hydrocarbons;
- Groundwater polluted with VOCs;
- Maintaining a facility or condition creating a source of pollution to waters of the State; and
- Maintaining a solid waste disposal facility without a permit

Requirements of the Order included the following:

- Retention of an environmental consultant to oversee actions required by the Order;
- Secure the Site from unauthorized vehicle entry;
- Removal of all solid waste to a permitted facility with notification of said facility to the State;
- Submittal of a Scope of Study (SOS) for the investigation defining the extent and degree of pollution to soil, surface water, and groundwater with locations of proposed monitoring wells and soil sampling, analytical parameters, and investigation schedule;
- Approval of the proposed SOS and associated schedule;
- Remedial Action Plans with soil, surface water, and groundwater monitoring plans;
- Approval of all permits for remedial actions;
- Remedial actions completed in accordance with approved schedule;
- Supplemental remedial actions, if necessary, on an approved schedule;
- Approval of any revisions to documents submitted;
- Progress reports;
- Full compliance;
- Sample and sampling analyses;
- Access to Site;
- Notification of non-compliance;
- Certification of documents;
- Notice of transfer;
- Notice to Commissioner of changes; and
- Submission of documents to Commissioner.

Memorandum, Cadlerock Properties Site, July 30, 2007, United States Environmental Protection Agency (US EPA). The purpose of the Action Memorandum was to request and document approval of the proposed removal action at the Cadlerock Site. As a request from the CTDEEP, the EPA Removal Program

conducted a Preliminary Assessment/Site Investigation (PA/SI) on the NWDA (Lot 11) at the Site from June 2006 through August 2006. The PA/SI included the collection of surface and subsurface soil, surface water, groundwater and sediment samples. Sample results identified elevated concentrations of antimony, arsenic, copper, lead, and zinc in soils at the surface and subsurface. Following the investigation, a Site Investigation Closure Memorandum was issued on March 29, 2007 recommending that a time-critical removal action be conducted on Lot 11 to address releases of hazardous substances from the Site.

Narrative Chronology (excerpt from the EPA PA/SI), October 2007. Previous activities on the Site are summarized from 1991 through 2006, including the above-referenced events associated with the PA/SI conducted by the EPA. In February 1999, HRP Associates (HRP) was retained by Cadlerock Properties Joint Venture, LP to remediate soil in the northwestern portion of the Site, identified as the NWDA (Lot 11) and the south-central portion, known as the SCDA (Lots 7, 8, and 9). Numerous buried materials were encountered in the SCDA, including concrete, fiberglass insulation, wire, plastic, tires, automotive or farm equipment, ash, metal pipes, septic tanks, propane and acetylene cylinders, sheet metal, steel beams, and metal tanks. In addition, several trenches were discovered ranging from 4 to 12 fbg containing household materials. HRP identified three areas of buried waste in the southern portion of the Site, behind the former restaurant (Lots 8 and 9), an area slightly southwest of the first location (Lots 7 and 8), and in the NWDA (Lot 11). In March and August 1999, HRP collected groundwater samples from the existing monitoring wells and surface water samples from Moritz Pond (Lots 8 and 13). Soil samples were collected from the sides and bottom of excavations completed and analyzed for VOCs, PCBs, RCRA 8 metals, TPH, and cyanide. Reportedly, no contaminants were detected exceeding regulatory criteria in any of the samples analyzed.

In August 2005, EPA and CTDEEP conducted a Site walk to observe existing conditions. In July 2006, the EPA Emergency Response Team (ERT) and the Superfund Technical Assessment and Response Team (START) mobilized to conduct a reconnaissance for future sampling activities. NOTE: The 2007 Narrative Chronology cites an EPA document, *Removal Program Sampling and Analysis Plan for the Cadlerock Properties Site Preliminary Assessment/Site Investigation*; however, this document was not available for BL Companies' review.

In July 2006, 123 surficial soil samples were collected for X-ray Fluorescent (XRF) metals analysis;

- 51 samples were collected from the NWDA (Lot 11)
- 72 samples were collected from the SCDA (Lots 7, 8, and 9)

In August 2006, subsurface soil, sediment, and surface water sampling was conducted, in which a total of 86 soil samples were collected for XRF metals analysis;

- 56 samples from the NWDA (Lot 11)
- 30 samples from the SCDA (Lots 6, 7, 8, 9, and 10)
- 2 samples from an area identified as the North-Central Disposal Area (NCDA) (Lot 19)
- 4 samples from an area identified as the Northeast Disposal Area (NEDA) (Lot 13) and
- 6 samples from an area south of the NWDA (Lot 11).

Field screening results are summarized as follows:

- 36 samples exceeded the Residential Direct Exposure Criteria (Res DEC) for arsenic
- 20 samples exceeded the Res DEC for lead
- 23 samples exceeded the Res DEC for copper
- 1 sample exceeded the Res DEC for silver
- 1 sample exceeded the Res DEC for zinc

A total of 12 soil samples were submitted for analysis for the presence of metals and 10 soil samples were submitted for analysis for the presence of VOCs, SVOCs, pesticides, PCBs, cyanide, hexavalent chromium, and Toxicity Characteristic Leaching Procedure (TCLP) metals.

Samples were submitted for analysis for metals, VOCs, SVOCs, pesticides, PCBs, cyanide, hexavalent chromium, and metals via the TCLP. A total of 9 groundwater samples were collected from the monitoring wells installed on Lot 11 and Lots 7, 8, and 9 by Rizzo in 1994. The samples were submitted for analysis for VOCs, SVOCs, metals, and hexavalent chromium. Results were presented in the report on Tables 2 through 8, Appendix B, pages 46 through 62. The results are discussed in conjunction with the August 2006 sampling event, as summarized below.

Six VOCs were detected in the soil samples below the Res DEC. Fourteen SVOCs were reported with one exceeding the Res DEC in one sample analyzed. Three pesticides and three PCBs were detected in the soil samples analyzed with one pesticide and one PCB exceedance. Seventeen metals were detected in the soil samples with exceedances for antimony, copper, and lead. All of the soil samples exceeding the Res DEC were collected from the NWDA (Lot 11) except for one (location not identified). Samples analyzed via TCLP were detected with barium and lead exceeding the DEC, and sediment samples detected chromium, nickel, and

mercury exceeding the National Oceanic Atmospheric Administration (NOAA) Screening Quick Reference Table (SQuiRT) threshold limits.

Acetone was detected in one groundwater sample analyzed, which was determined to be associated with laboratory contamination. One SVOC and five metals were detected below RSR criteria in the samples analyzed.

Pollution Report, CadleRock Properties Site, November 7, 2007, US EPA. The report presents a chronological timeline of remedial efforts previously conducted on Lot 11 at the Site. Recommendations included conducting a potable supply well investigation to determine if any impacts were migrating off-Site and conducting a public information meeting regarding the environmental status of the Site.

Pollution Report, CadleRock Properties Site, December 21, 2007, US EPA. The report documented activities on the Site and recommended resubmitting a Removal Action Work Plan (RAWP) for removal actions at Lot 11.

Pollution Report, CadleRock Properties Site, August 6, 2008, US EPA. The report documented activities on the Site at Lot 11 and recommended environmental cleanup of the property, including remobilization of heavy equipment and emergency response personnel to begin excavation and removal of contaminated debris on September 2, 2008. Analytical results from the 2007 drinking water sampling event detected metals in the samples analyzed. In addition, SVOCs, PCBs, and mercury were not detected in any of the samples analyzed.

Order No. SRD-191, CTDEEP, August 13, 2008. This Order was issued as a substitute Order for SRD-182, which was originally issued to Benjamin Schilberg as an individual. Due to Mr. Schilberg's death prior to the conclusion of the Order, SRD-191 was issued to the Estate of Benjamin Schilberg, Site tenant. According to documents reviewed, a significant portion of the hearing records was established regarding SRD-182 before Mr. Schilberg's death. The following findings summarize the findings for both Orders:

- The Order finds that the Respondent, Benjamin Schilberg, conducted activities on the Site without a State issued permit between 1967 and 1972, for approximately one year on an approximate 10,000 square foot area of a vacant parcel (Lot 11 of the Site);
- Activities included burning insulated wire to recover metals utilizing materials including accelerants such as gasoline or kerosene;
- Wastes generated from the activity were disposed of on- and off-site;

- Resulting in soil pollution consisting of heavy metals, VOCs, and petroleum hydrocarbons; and
- Groundwater polluted with VOCs;
- Respondent did not obtain a permit to discharge to the waters of the State;
- Respondent is responsible for remediation of such pollution;
- SRD-182 was issued to Benjamin Schilberg; who
- Maintained a facility or condition creating a source of pollution to waters of the State.

Requirements of the Order included the following:

- Retention of an environmental consultant to oversee actions required by the Order;
- Submission of a Scope of Study (SOS) for proposed soil and groundwater sampling locations, a sampling and analytical program, and a schedule for conducting the investigation;
- Performance of investigation in accordance with an approved SOS and notification to the Commissioner of monitoring well installation;
- A Supplemental Plan of Investigation, if the degree of contamination was not fully characterized by the original SOS;
- An Investigation Plan and Remedial Action Plan to define the existing and potential degree of soil, surface water, and groundwater pollution;
- Evaluation of the alternatives for remedial action and approvals required for the actions, and a proposed schedule for the remedial actions;
- Submission of a Groundwater Monitoring Plan and proposed schedule;
- Obtaining the required permits for remediation;
- Performance of the monitoring program on a quarterly basis;
- Additional remedial actions, measures, and reporting, if necessary;
- Progress reports detailing remedial actions, sampling and analyses;
- Full compliance, with any notification of any non-compliance issues.

Memorandum, CadleRock Properties Site, August 14, 2008, US EPA. The purpose of this Action Memorandum was to request and document approval of an increase in the additional removal project ceiling to fund a continued removal action for Lot 11. The EPA determined that actual or threatened releases of hazardous substances from the Site, if not addressed by implementing the response, would present an imminent and substantial endangerment to public health, or welfare, or the environment.

Pollution Report, CadleRock Properties Site, January 5, 2009, US EPA. This report documented the remedial efforts previously conducted on the Site. The report stated that planned removal actions included disposal of the stockpiled soil and debris

throughout the property and securing the Site for the winter months, with plans to remobilize in Spring of 2009 to perform test pit activities and additional excavation at Lot 11, if necessary.

Correspondence from the CTDEEP to Cadlerock Properties, September 10, 2009. The letter stated that Cadlerock Properties failed to comply with DEP Order No. SRD-088. The Order stated that a significant amount of waste materials remained on the surface on the Ashford portion of the Site (Lots 3, 6, 7, 8, 9, 11, 13, and 19.) A directive was given for Cadlerock Properties to conduct an investigation and undertake the remedial actions at the Site in conformance with the requirements of the Connecticut RSRs.

Notice of Federal Lien, United States US EPA, November 24, 2009. The lien identified Lots 11 and 11A in the Town of Willington and Lots 8, 9, 10, 13, and 19 in the Town of Ashford and is attached to the Cadlerock Properties Superfund Site as provided by the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA).

Correspondence from the CTDEEP to Cadlerock Properties, March 4, 2010. According to the letter, the CTDEEP reviewed a draft SOS for the northwest portion of the Site (Lot 11) submitted in December 21, 2009 from the estate of Benjamin Schilberg. The letter cites a US EPA document that stated that 3,700 cubic yards of waste had been removed from EPA activities at the Site. Pending regulatory requirements were noted as the inclusion of additional soil borings in all areas of antimony-impacted soil, the installation of additional groundwater monitoring wells, groundwater sampling for all COCs, and the tabulation of all laboratory analytical results with a completed investigation report.

Correspondence from the CTDEEP to The Estate of Benjamin Schilberg, March 4, 2010. According to the letter, the CTDEEP was unable to approve the SOS submitted for the Supplemental Investigation for the northwest portion of the Site (Lot 11) due to its limited nature. The letter indicated that the Site owner would undertake a soil sampling program without the approval of the Department. However, the CTDEEP states that the Department is under no obligation to accept the findings of the investigation and that the scope of work would not be in accordance with the pollution abatement order previously issued.

Removal Program After Action Report (AAR) for The Cadlerock Properties Site, Willington/Ashford, Connecticut, prepared for EPA, prepared by Weston Solutions, Inc. (Weston), April 2010. Between 1991 and 1995, the CTDEEP and private consultants identified two major areas of concern on the Site, including the

Northwest Disposal Area (NWDA) located in Willington identified as Lot 11, and the South-Central Disposal Area (SCDA) located in Ashford identified as 6, 7, 8, 9, and 10. The report indicated that concentrations of lead exceeded the TCLP regulatory standards and elevated levels of TPH, barium, cadmium, and chromium, as well as trace concentrations of mercury and silver were also detected in soil samples analyzed.

Between 1991 and 1992, inspections of the NWDA were conducted by the CTDEEP, in which an area devoid of vegetation was observed with charred wire, tires, vehicle parts, and blue-green stained soil from former wire-burning activities. In addition, several piles of demolition debris, several 55-gallon drums, and scrap metal were reported as distributed throughout the Site (locations not identified). In 1992, the CTDEEP conducted area well sampling and analysis for VOCs, metals, and cyanide. Detections of iron and manganese were considered naturally occurring and not associated with the Site. In 1992 and 1994, Rizzo was retained to conduct investigations, which are discussed in Section 4.3 of this report.

In 1997, the CTDEEP issued Order No. SRD-088 for Lots 3, 6, 7, 8, 9, 10, 11, 13, and 19 for disposal of solid waste without a permit, burning and disposing of wire insulation to recover metals, VOC contamination of groundwater, TPH and heavy metal contamination of soil, and maintaining a solid waste disposal facility without a permit. The Order required the owner to investigate and remediate contamination on the Site. In 1999, HRP began remedial excavation activities in the NWDA and test pit excavations on existing soil piles. NOTE: The AAR cites an HRP report, *Scope of Study for Environmental Investigation and Remediation at the Cadle Rock Property*; however, this report was not available for BL Companies' review.

In February 1999, HRP Associates (HRP), an environmental consultant for Cadlerock, reportedly conducted test excavations on some of the soil piles located in the SCDA (Lots 6, 7, 8, 9, and 10). Materials encountered included cement, charred wood, pink fiberglass insulation, metal siding, bricks, black ash, lumber, automotive or farm equipment parts, metal pipes, plastic strapping, burnt wood, wire, plastic containers, carpet, four septic tanks, empty propane or acetylene tanks, sheet metal, steel beams, rebar, crushed and cut-up metal tanks, plastic bags and containers, windshield washer fluid containers, and metal scrapping. Soil samples were reportedly collected from excavated and staged soil. In addition, HRP discovered several trenches (location not specified) ranging from 4 to 12 fbg containing household debris.

In March and August 1999, HRP collected soil samples in the vicinity of Moritz Pond (Lots 8 and 13), from the NWDA (Lot 11), the SCDA (Lots 7, 8, and 9), and two cornfield areas in the southwestern and northeastern portions of the Site. The AAR

cites an *HRP Scope of Study for Environmental Investigation and Remediation at the Cadle Property* (unavailable for review), in which groundwater samples were collected from on-Site monitoring wells and surface water samples were collected from the man-made pond and Moritz Pond. Soil was reportedly excavated from the NWDA and the SCDA for off-Site disposal. Soil samples were collected and submitted for analysis for VOCs, PCBs, RCRA 8 metals, TPH, and cyanide. No contaminants were detected exceeding the RSR criteria.

The AAR cites a letter from HRP to The Cadle Company in April 1999 describing the ongoing remediation and solid waste excavation activities at the Site. The letter reportedly noted the presence of three areas of surficial solid waste and buried solid waste located on Lots 8 and 9, measuring approximately 4,871 and 7,798 cubic yards and 1,327 and 3,044 cubic yards. The third area was located on Lot 11 and measured approximately 1,308 and 6,257 cubic yards.

In 2006, the EPA mobilized to conduct surface and subsurface soil, sediment, and surface water sampling on Lots 3, 6, 7, 8, 9, 11, 13, and 19 (as discussed in the above-referenced Chronological Narrative, 2007). During the 2007 removal, the EPA on-Site Coordinator requested that soil samples be collected from the access road and staging area to confirm that these areas were not contaminated. In September 2007, 25 surficial soil samples were collected and submitted for analysis for antimony, arsenic, copper, chromium, lead, mercury, zinc, and/or PCBs. No metals or PCBs exceeding the applicable RSR criteria were detected in any of the samples analyzed. Metals were detected exceeding RSR criteria in surficial soil samples collected from test pits excavated in the NWDA (Lot 11).

Area water supply wells were sampled in November 2007, and in February 2008 additional samples were collected at area properties where elevated lead levels were detected. In May 2008, groundwater samples were collected from existing monitoring wells in the NWDA (Lot 11) and submitted for analysis for VOCs, SVOCs, PCBs, and metals. Low levels of acetone and metals were detected in the samples analyzed. The US EPA reported that 5 tons of scrap metal and 124 tires were removed from Lot 11 in September 2008. In addition, a 10,000-gallon water treatment tank was installed on the western side of the entrance to the NWDA (Lot 11). The excavation of contaminated soil began in September 2008 and post-excavation grid soil samples were submitted for analysis for SVOCs, PCBs, metals, pesticides, and cyanide analysis. Contaminants identified included SVOCs, metals, and PCBs. In October 2008, 14 drum carcasses were encountered on the surface of the SCDA (Lots 6, 7, 8, 9, and 10) and the trail connecting the NWDA to the SCDA. Stockpiled soil was estimated to be 3,500 tons by November 2008. Composite sampling of the stock piles detected concentrations of VOCs, SVOCs, PCBs, metals, pesticides, and herbicides. In January 2009, 2,864.45

tons of soil and 12.04 tons of scrap metal debris were removed from the NWDA (Lot 11).

In June 2009, subsequent to a GPR survey, test pits were excavated in the SCDA (Lots 7, 8, and 9). A UST was encountered in 3 test pits locations, which was determined to be a septic tank. In the NWDA, grid locations were identified for surface soil sampling for antimony in a wooded wetland area. Surface metal was removed and excavation to 2 fbg was conducted. All areas of antimony exceeding criteria were excavated and wetlands restoration were conducted on the Site. On August 29, 2009, the Connecticut Department of Public Health (CT DPH) issued a letter to the EPA concluding that the Time-Critical Removal Action was adequately protective as a short-term solution for any contaminated soil left in the wooded wetland area, which would be addressed in future monitoring.

Correspondence from the CTDEEP to The Estate of Benjamin Schilberg, July 1, 2010, regarding Order No. SRD-182 and SRD-191, July 1, 2010. The letter indicated that an Environmental Land Use Restriction (ELUR) was proposed for a portion of Lot 11 via a limited ownership interest conveyance between the owner, Cadlerock Properties, and Benjamin Schilberg, for the sole purpose of executing and recording an ELUR on a portion of Lot 11 where antimony exceeded the RSR criteria. The ELUR would restrict the use of the property to industrial-commercial use. The request referred to an EPA Consent Order; however, did not recognize the outstanding CTDEEP Orders. The letter notes that the Town of Willington was not consulted regarding the ELUR to determine if the ELUR was acceptable without rezoning the entire Lot 11 to an industrial-commercial use. In addition, the CTDEEP indicated that there was concern regarding potential development of the remaining portion of Lot 11 for residential use or open space. The CTDEEP stated that the proposed request was inconsistent with the requirements of the Connecticut General Statutes (CGS) and was not protective of human health and the environment.

Scope of Services (SOS), Groundwater Monitoring, NWDA (Lot 11), Cadlerock Properties, GeoQuest, March 21, 2011. The correspondence noted that since 2008, approximately 5,000 cubic yards of soil had been excavated from Lot 11 at depths of 1 to 5 fbg, with the top 2 feet contaminated with antimony disposed of as hazardous waste. In addition, 124 tires and 36.2 tons of scrap metal had been removed and backfilled with approximately 4,000 cubic yards of material. The SOS indicates that groundwater samples would be collected for four quarters and included analysis for ETPH, VOCs, SVOCs, PCBs, RCRA metals (arsenic, barium, cadmium, chromium, lead, mercury, and silver), and antimony, copper, nickel, and zinc. The SOS stated that 5 wells would be necessary for the sampling program; however, only two of the existing wells appeared to be suitable for use, therefore, it was assumed that two

up-gradient wells and three down-gradient wells would need to be installed. The SOS indicated that the wells would be installed 5 feet into the water table. Subsequent to the sampling events, a well location map with groundwater flow direction, analytical reports, an assessment of impact, and a discussion of the data as it related to the Connecticut RSRs would be submitted.

Correspondence from Jacobs, Walker, Rice, & Barry, LLC to the CTDEEP dated April 6, 2011 stating that GeoQuest had been retained pursuant to Orders SRD-182 and SRD-191 for the Estate of Benjamin Schilling.

Final Decision, Orders No. SRD-182 and SRD-191, CTDEEP Environmental Protection Office of Adjudications, September 23, 2011. The document states that an appeal of pollution abatement Order issued to Benjamin Schilberg and the Estate of Benjamin Schilberg for activities performed at the property in Willington between 1967 and 1972. The Order required Mr. Schilberg and now, his estate, to investigate, remediate, and monitor for pollution. The hearing began in 2008 and concluded in 2011. The hearing was suspended due to ongoing remediation activities led by the US EPA. In 2008, Mr. Schilberg was deceased and his estate became the substitute respondent. A new Order, SRD-191 was issued to the Estate of Benjamin Schilberg, which incorporated the same allegations as SRD-182, unpermitted burning operations generated waste ash and accelerants, which remained on the parcel at the time of the original Order issued in 2007. Soil and groundwater sampling conducted from 1991 to 1993 detected metals in soil exceeding regulatory criteria and groundwater was impacted with petroleum hydrocarbons.

The EPA completed a Removal Action in 2009, removing 3,700 cubic yards of waste material, of which 2,422 cubic yards were considered hazardous waste (Lot 11). The EPA removal brought the remaining soils into compliance and four quarters of groundwater monitoring were required to achieve compliance for groundwater. The Order states that the respondent filed an acceptable plan for monitoring, which was approved by the CTDEEP. The Department staff agreed that substantial portions of the Order were fulfilled through the EPA Removal Action; however, the respondent has failed to complete four rounds of groundwater sampling as required by the Order. According to the Order, the appeal of the Order contends that the CTDEEP lacks the authority to unilaterally order the follow-up steps without providing the Respondent the opportunity to be heard; without an express provision for a hearing, the Respondent argues that its constitutional due process rights are violated. The Decision states the hearing determined that the allegations were supported by facts, which determined that the Respondent is legally obligated to remediate the Site in accordance with the RSRs. The CTDEEP has met its burden of proof under the statute that the Respondent created a condition that posed a risk for groundwater contamination, therefore, the

implementation of the final groundwater monitoring plan required by the Order and approved by the CTDEEP staff is necessary to assure that no groundwater contamination occurred and that groundwater may be used according to its GA and GAA classification.

Judgement Lien, CTDEEP, Cadlerock Properties, Joint Venture, L. P., December 23, 2011. The lien was attached to the identified Lots 11 and 11A in the Town of Willington.

Correspondence from August 7, 2015 to November 2016 between the Town of Ashford and the CTDEEP regarding the Order existing on the Site, and an agreement for a cooperative resolution to achieving remediation and closure for the Site. These documents recognize the completion of a certain amount of investigation and remediation at the NWDA (Lot 11), but clearly state the need for additional investigation and possibly remediation on Lot 11 in Willington and portions of the Site in Ashford.

Copies of these documents are included in the Supporting Documents Appendix.

7.1 Environmental Database Search

BL Companies retained EDR to conduct a database search for available regulatory records pertaining to the Site and off-site properties located within the search radii as set forth in ASTM E-1527-13. In addition, EDR's database report included several non-ASTM databases with EDR-designated search radii. The attached environmental database report (see Appendices) defines and summarizes the databases reviewed and notes if any facilities, including the Site (referred to as the "Target Property" or "TP" by EDR), were identified within the specified radii. Federal, state, and tribal databases searched by EDR, and corresponding minimum search distances, included, but were not limited to, the following:

Map Findings Summary

Database	Site	Search Distance (Miles)	< 1/8	1/8 - 1/4	1/4 - 1/2	1/2 - 1	> 1	Total Plotted
NPL		1	0	0	0	0	NR	0
Proposed NPL		1	0	0	0	0	NR	0
NPL LIENS		TP	NR	NR	NR	NR	NR	0
Delisted NPL		1	0	0	0	0	NR	0
CORRACTS		1	0	0	0	0	NR	0
RCRA-TSDF		0.5	0	0	0	NR	NR	0
RCRA-LQG		0.25	0	0	NR	NR	NR	0
RCRA-SQG		0.25	0	0	NR	NR	NR	0
RCRA-CESQG		0.25	0	0	NR	NR	NR	0
US ENG CONTROLS		0.5	0	0	0	NR	NR	0
US INST CONTROL		0.5	0	0	0	NR	NR	0
ERNS		TP	NR	NR	NR	NR	NR	0
LUCIS		0.5	0	0	0	NR	NR	0
SEMS		0.5	0	0	0	NR	NR	0
SEMS-ARCHIVE	X	0.5	1	0	0	NR	NR	1
FEDERAL FACILITY		0.5	0	0	0	NR	NR	0
FEMA UST		0.25	0	0	NR	NR	NR	0
CT MANIFEST		0.25	1	0	NR	NR	NR	1
CT UST		0.25	0	0	NR	NR	NR	0
CT AST		0.25	0	0	NR	NR	NR	0
NY MANIFEST		0.25	1	0	NR	NR	NR	1
CT BROWNFIELDS 2		0.5	0	0	0	NR	NR	0
CT BROWNFIELDS		0.5	0	0	0	NR	NR	0
CT LWDS	X	0.25	1	0	NR	NR	NR	1
CT SDADB		0.5	1	0	0	NR	NR	1
CT LUST		0.5	0	0	0	NR	NR	0
CT ENG CONTROLS		0.5	0	0	0	NR	NR	0
CT VCP		0.5	0	0	0	NR	NR	0
CT AUL		0.5	0	0	0	NR	NR	0
CT SWF/LF		0.5	0	0	0	NR	NR	0
CT SHWS		1	0	0	0	0	NR	0
INDIAN LUST		0.5	0	0	0	NR	NR	0
INDIAN UST		0.25	0	0	NR	NR	NR	0
INDIAN VCP		0.5	0	0	0	NR	NR	0
LIENS 2	X	TP	NR	NR	NR	NR	NR	0
PRP	X	TP	NR	NR	NR	NR	NR	0
LEAD SMELTER	X	TP	NR	NR	NR	NR	NR	0

TP = Target Property
NR = Not Requested

7.2 Site Database Findings

The Site was identified on one or more of the databases searched by EDR. However, several listings are inaccurately mapped. The database listings for the Site are as follows:

Facility Name:	CADLEROCK JP LV
Databases:	LWDS
Address:	ROUTE 44
Comments:	The Site is listed as an inactive Leachate Wastewater Discharge Site. The EDR database cites The Wagonshed and Ashford Development in association with the Site.

Facility Name:	CADLEROCK PROPERTIES
Databases:	SEMS-ARCHIVE, LIENS 2, LEAD SMELTER, PRP
Address:	392 AND 460 SQUAW HOLLOW ROAD (ROUTE 44)
Comments:	The Site is listed on the US EPA Superfund Enterprise Management Systems as an archive Superfund Site that has no further interest under the Superfund program and no further remedial action is planned. The Site is listed with an EPA Superfund lien from the expenditure of Superfund monies for investigation of releases and/or threatened releases of contamination. The listing identified Cadlerock Properties Joint Venture L.P., Schilberg Integrated Metals Corporation, Thomas Nigro, and The Cadle Company as Potentially Responsible Parties (PRPs). The Site is listed on a database of former lead smelter site locations. The EDR database cites illegal disposal of batteries, scrap metals, secondary smelting, and precious metal recovery. Primary contaminants are listed as PCBs, lead, copper, antimony, dieldrin, hexachlorobenzene, and zinc. The Site is listed as a Potential Responsible Party (PRP) for payment of Superfund cleanup costs.

7.3 Off-Site Database Findings

As noted in Section 7.1 above, the database report identified database listings at off-site facilities within the ASTM E1527-13 search radii. All of the identified off-site facilities are either located hydraulically down-gradient of the Site (based on the inferred direction of groundwater flow), have a "closed", "archived", "cleanup completed", or "NFRAP" status, or are located outside the minimum search distance for an environmental record source. Therefore, these facilities are not believed to have the potential to adversely impact the Site and are not discussed further.

Orphan (i.e., non-geocoded) listings were identified by the database search, but these facilities could not be located by EDR in reference to the Site due to missing or inadequate address information. According to ASTM E1527-13, these listings are "not practically reviewable," and thus, are not described below.

7.4 Agency File Review Findings

Based on the results of the database search and the historical research, BL Companies performed a regulatory file review at the CTDEEP as part of this assessment, the findings of which are discussed below.

- **Correspondence from the CTDEEP to Jacobs, Walker, Ric, & Barry, LLC, representing Mrs. Joyce Schilberg, August 25, 2010.** According to the letter, the CTDEEP reviewed a revised SOS for a Supplemental Investigation submitted on July 27, 2010 for the NWDA, on behalf of the Estate of Benjamin Schilberg. The COCs required for post-remediation monitoring included VOCs, SVOCs, RCRA 8 metals, including antimony, copper, nickel, and zinc, extractable total petroleum hydrocarbons (ETPH), and PCBs, including arachlors. The letter stipulates that the designated consultant must provide rationale for the grid blocks chosen for surficial and subsurface soil sampling and a Site Plan with locations of proposed groundwater monitoring wells.

- **Correspondence from the CTDEEP to Jacobs, Walker, Ric, & Barry, LLC, October 7, 2010 regarding soil sampling efforts.**The letter indicated that mediation was ongoing between the Department and the Estate and its consultant, GeoQuest, for a proposed SOS for a supplemental investigation for Lot 11. The letter states that the SOS has not been approved based on the limited nature of the investigation, and that the Estate reported to the CTDEEP that soil sampling would be undertaken without the Department's approval. The CTDEEP served notice to the Estate that Order Nos. SRD-182 and SRD-191 required all submittals to conform to the requirements of each step of the administrative orders and that groundwater monitoring was also required for the investigation.

- **Supplemental Subsurface Investigation, prepared for Levy & Droney, P. C. on behalf of the Estate of Benjamin Schilberg, prepared by GeoQuest, October 29, 2010.** The investigation was conducted at the request of the CTDEEP to determine whether further remediation was necessary in the eastern and northern portions of the NWDA (Lot 11). Sampling points were identified based on the levels of antimony reported by Weston in 2010 (Removal Program Action Report). Based on the depth to bedrock encountered at 12 inches or less, 16 soil samples were collected from 0 to 6 inches and 6 to 12 inches whenever possible. Antimony was detected below RSR criteria in two of the soil samples analyzed. The report concluded that no further remediation was warranted in those portions of the NWDA.

- **Correspondence from the CTDEEP to GeoQuest, Inc. (GeoQuest) dated January 5, 2011**. The letter served as an agreement that no further investigation was warranted beyond the perimeter of the NWDA (Lot 11); however, the CTDEEP requested that the antimony be evaluated in terms of potential ecological exposure pathways in proximity to regulated wetlands.

- **Ecological Concerns Regarding the Presence of Antimony in Soil, NWDA, Cadlerock, Route 44, Willington, prepared for CTDEEP, prepared by GeoQuest, January 10, 2011**. According to the report, low concentrations of antimony were detected in soil samples collected from Lot 11 of the NWDA in January 2011. GeoQuest cites a letter from the CTDEEP with concerns of the possible ecological impact on the nearby wetland area. The report concludes that no further investigation or remediation was warranted based on the extensive remediation previously conducted, the concentrations of antimony detected were below RSR criteria in only two samples analyzed, antimony is slightly soluble, and the distance from the wetlands to the soil with antimony detections made it unlikely for migration, antimony is not a carcinogen, and that remediation activities in the NWDA were successful in protecting the environment, specifically the wetlands.

- **Correspondence from the CTDEEP to Jacobs, Walker, Rice, & Barry, LLC**, dated February 7, 2011. The letter stated that the CTDEEP accepted GeoQuest's analysis that there was unlikely adverse ecological effects to aquatic life from the antimony, and that no additional soil sampling or remediation was required. However, the Department required that the Estate submit a final groundwater monitoring plan.

- **Correspondence from the CTDEEP to Jacobs, Walker, Rice, & Barry, LLC,** dated February 22, 2011 responding to a SOS submitted by the Schilberg Estate's environmental consultant, GeoQuest, in January 2011. The letter indicated that four consecutive quarters of groundwater sampling were required and a final sampling plan must be submitted for investigation

- **Correspondence from the CTDEEP to Jacobs, Walker, Rice, & Barry, LLC**, dated March 22, 2011, approving the SOS submitted by GeoQuest for the NWDA groundwater monitoring program.

- **Groundwater Sampling, Cadlerock, NWDA (Lot 11), GeoQuest, July 12, 2011**. On June 8, 2011, groundwater samples were collected from five newly installed monitoring wells and submitted for analysis for TPH, VOCs, PCBs, RCRA 8 metals, copper, nickel, zinc, antimony, and SVOCs. Analytical results

detected barium, lead, copper, and SVOCs below RSR criteria in the samples analyzed. No TPH, VOCs, or PCBs were detected in the samples analyzed.

- **Groundwater Sampling, Cadlerock, NWDA (Lot 11), GeoQuest, September 29, 2011**. On September 14, 2011, groundwater samples were collected from the five monitoring wells and submitted for analysis for TPH, VOCs, PCBs, RCRA 8 metals, copper, nickel, zinc, and antimony, and SVOCs. Analytical results detected SVOCs and copper below RSR criteria in the samples analyzed. No TPH, VOCs, or PCBs were detected in the samples analyzed.

- **Groundwater Sampling, Cadlerock, NWDA (Lot 11), GeoQuest, June 11, 2012**. On March 14, 2012, groundwater samples were collected from the five monitoring wells and submitted for analysis for TPH, VOCs, PCBs, RCRA 8 metals, copper, nickel, zinc, antimony, and SVOCs. Analytical results detected one SVOC below RSR criteria in the samples analyzed. No TPH, VOCs, metals, or PCBs were detected in the samples analyzed.

- **Correspondence from GeoQuest to the CTDEEP dated June 27, 2012** requesting to discontinue groundwater monitoring on Lot 11 based on the results of four rounds of monitoring with no contaminants detected above regulatory criteria.

- **Correspondence from the CTDEEP to GeoQuest dated August 9, 2012** regarding the NWDA (Lot 11). The letter stated that two SVOC compounds, bis(2-ethylhexyl) phthalate and diethyl phthalate, were detected in groundwater samples collected in four wells during the first, third, and fourth rounds of sampling. GeoQuest had determined that the presence of these compounds was a result of laboratory contamination; however, the CTDEEP indicated that this was inconclusive and only addressed one of two issues. According to the letter, one of the two SVOCs had been detected on three occasions at concentrations exceeding the RSR criteria. CTDEEP indicated that although no criteria had been established for bis (2-ethylhexyl) phthalate, the concentrations detected warranted further assessment with additional sampling, including field and laboratory duplicates submitted to determine if the compound was due to laboratory contamination.

Copies of the documents obtained during the file review are included in the Supporting Documentation Appendix.

7.5 Evaluation of the Potential for Vapor Concerns

BL Companies also reviewed database listings to identify potential sources of impact via soil vapor migration. A Vapor Encroachment Screening, as defined in ASTM E-2600-10 "Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions", is outside the scope of this Phase I ESA, and therefore, was not performed. The review of database listings completed for this ESA to identify potential subsurface vapor concerns at the Site is not intended to fulfill the requirements of ASTM E-2600-10, and does not constitute a Tier 1 Vapor Encroachment Screening.

The Site was identified in the EDR database search as a Superfund Site. In addition, off-site facilities with USTs and/or activities involving the generation of hazardous waste were identified in close proximity to the Site; however, none of the facilities were identified on any release-type databases (e.g., CERCLIS, LUST, VCP, Brownfields, etc.). Although the Site has a history of impacts to soil and/or groundwater from past dumping and wire-burning activities, based on the investigation and remediation activities conducted at the Site, VOCs at concentrations with the potential to create vapor intrusion have not been identified at the Site, and there does not appear to be a the potential for subsurface vapor conditions. One structure is located on Lot 7; however, the condition of the building is substandard and uninhabitable.

8.1 Current Owners/Operators

No current Site owners/occupants were available to be interviewed by BL Companies during this assessment.

8.2 Past Owners/Occupants

No past Site owners/occupants were interviewed by BL Companies during this assessment.

8.3 State/Local Government Officials

Municipal records were provided to BL Companies by the Town of Ashford and the Town of Willington. Information reviewed is discussed in Section 6.5. Ms. Christine Abikoff, Town of Ashford, provided information on the User Questionnaire as it relates to the current environmental conditions on the Site. In addition, files were reviewed and/or provided by the CTDEEP and are discussed in Section 7.4.

8.4 Other

No other persons knowledgeable of the Site were interviewed by BL Companies during this assessment.

The Site was visited on July 31, 2018 for the purpose of performing a visual reconnaissance. Selected photographs taken on the reconnaissance date are attached (see Site Photographs appendix).

9.1 Methodology and Limiting Conditions

During the reconnaissance, reasonably-accessible portions of the Site (Lots 6, 7, 8, 9, 11A, 11, and 19) and property boundaries as well as surrounding roadways were traversed on foot or in a vehicle and evaluated for conditions indicative of RECs in connection with the Site. All adjacent properties that could be viewed from the Site were observed; however, no adjacent properties were traversed. BL Companies was unaccompanied during the Site reconnaissance.

In addition, BL Companies employed the use of a drone to perform Site-wide observations. A grid pattern navigating from east to west was conducted to achieve a complete aerial photograph of the Site.

9.2 PCBs

PCBs belong to a broad family of man-made organic chemicals known as chlorinated hydrocarbons and were domestically manufactured from 1929 until their manufacture was banned in 1979. Due to their non-flammability, chemical stability, high boiling point, and electrical insulating properties, PCBs were used in hundreds of industrial and commercial applications including electrical, heat transfer, and hydraulic equipment (e.g., transformers, hydraulic lifts, elevators, etc.). It should be noted that the evaluation of the potential for PCB-containing fluorescent light ballasts is not required by ASTM, and thus, is not addressed as part of this assessment.

During previous investigations, based on historic activities on the Site, soil was analyzed for the presence of PCBs, with exceedances detected in the NWDA (Lot 11).

9.3 Storage Tanks

An abandoned AST was observed in the man-made pond at the time of the Site reconnaissance. In addition, based on previous investigations, a 500-gallon fuel oil AST was observed on Lot 8 during reconnaissance activities. Reportedly, at least 12.04 tons of scrap metal debris were removed from the NWDA (Lot 11) in 2009 by the US EPA.

9.4 Drums and/or Unidentified Substance Containers

An abandoned 55-gallon metal drum was observed in the man-made pond at the time of the Site reconnaissance. However, based on previous investigations, several

55-gallon drums were encountered on Lot 11 during Site reconnaissance activities. The contents of these drums was not established. In January 2009, 2,864.45 tons of soil and 12.04 tons of scrap metal debris were removed from the NWDA (Lot 11) by the USEPA.

9.5 Hazardous Substance and Petroleum Products

No evidence of the current or former use and/or storage of hazardous substances or petroleum products was observed at the time of the Site reconnaissance. However, based on previous investigations, the Site was historically utilized for wire burning activities (Lot 11) and solid waste disposal (Lots 3, 6, 7, 8, 9, 10, 11, 13, and 19).

9.6 Odors

No strong, pungent, or noxious odors were noted at the time of the Site reconnaissance.

9.7 Staining or Stressed Vegetation

No stained soil, stained pavement, or stressed vegetation was observed at the time of the Site reconnaissance. However, based on previous investigations, discolored soil was encountered on Lot 11 and attributed to the former wire burning operations.

9.8 Pools of Liquid

No pools of liquid were observed at the time of the Site reconnaissance.

9.9 Drains and Sumps

No active floor drains or sumps were observed at the time of the Site reconnaissance.

9.10 Pits, Ponds, or Lagoons

According to previous investigations, and on-Site observations, a man-made pond is located in the south-central portion of the Site (Lots 8, 9, and 10). In addition, Moritz Pond is located on Lots 8 and 13. Previous surface water sampling events did not detect any COCs above RSR criteria; however, sediment samples were detected with chromium, nickel, and mercury exceeding the NOAA Screening Quick Reference Table (SQuiRT) threshold limits.

9.11 Solid Waste

Discarded scrap metal parts were observed in the NWDA (Lot 11) during the Site reconnaissance. According to previous investigations, this area and other portions of the Site (Lots 3, 6, 7, 8, 9, 10, 11, 13, and 19) were historically utilized as solid waste disposal areas.

9.12 Waste Water

The Site formerly maintained structures that reportedly utilized a septic system and leach field in the south-central portion.

9.13 Wells

Based on previous investigations, at least 15 groundwater monitoring wells were installed on Lots 8 and 11 between 1991 and 2011. Eight monitoring wells were observed in the SCDA (Lot 8) and the NWDA (Lot 11) of the Site.

9.14 Septic Systems

No evidence of on-Site septic systems was observed at the time of the Site reconnaissance. However, based on previous investigations, a former septic system and leaching fields were located north of the residential and commercial structures located on the southern Site boundary, on Lots 7, 8, and 9.

9.15 Surrounding Properties

No surficial indications of obvious environmental impairment were observed at any of the adjoining or neighboring properties.

No "non-scope considerations" (e.g., ACMs, LBP, PCB-containing building materials, wetlands, radon, lead in drinking water, etc.), as discussed in Section 13 and Appendix X5 of ASTM E-1527-13, were evaluated as part of this assessment.

BL Companies made various efforts to obtain information from the User and review reasonably-ascertainable historical sources to develop a history of the previous uses of the Site and surrounding area, in order to help identify the likelihood of past uses having led to RECs in connection with the Site. The historical research is considered complete when either the above objectives have been met, or when data failure is encountered. Data failure, as defined by ASTM E-1527-13, occurs when all of the standard historical sources that are reasonably-ascertainable and likely to be useful have been reviewed and yet the objectives have not been met. Data failure is one type of data gap. A data gap, as defined by ASTM E-1527-13, is a lack or inability to obtain information required by this practice despite good faith efforts to gather such information. Deviations from the standard practice, including User-imposed constraints, may also represent a data gap. A data gap is only considered significant when it impacts the ability of the consultant to identify RECs.

This assessment has encountered the following data failure(s) and/or data gap(s) during the preparation of this ESA:

- Previous environmental reports cited within the reports reviewed by BL Companies were unavailable upon request at the CTDEEP, thereby limiting a review of additional data regarding Site conditions.

- The inability to interview past owners and/or occupants of the Site.

- The inability to interview current owners and/or occupants of the Site.

- Portions of the Site were densely overgrown with vegetation and inaccessible for inspection, inhibiting visual observations.

Based on the information presented in this Report, it is the opinion of BL Companies that no *significant* data gaps were encountered during completion of this assessment.

This ESA was conducted in general accordance with the scope and limitations of ASTM E1527-13 "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process", in accordance with the CTDEEP Site Characterization Guidance Document (SCGD), and in accordance with BL Companies' contract dated May 22, 2018. Deviations from (or exceptions to) the ASTM E1527-13 standard of practice, as well as data gaps encountered during the course of this assessment, are discussed in Sections 2.4 and 11.0 of this Report. Limitations of this assessment are described in Section 13.0.

12.1 Summary of Site History

According to historical sources and previous investigations, a former residence with an attached barn, which was occupied by a tractor sales and service operation, and an additional structure utilized as a restaurant and novelty store were present on the Site (Lots 7, 8, and 9) until approximately 1980. The restaurant and store were reportedly destroyed by fire in 1980 and razed in 1990. The buildings utilized a septic system and leach fields located north of the structures (Lots 7, 8, and 9). Stormwater drainage systems were present on Lots 7, 8, and 9 during a 1992 Site inspection, which reportedly discharged to the man-made pond on the Site. A structure in the central portion of the Site (Lot 7) was reportedly associated with a former golf driving range operation; a scrap metal operation was conducted in the south-central portion of the property (Lots 7 and 8).

Reportedly, unauthorized wire burning activities were conducted in the northwestern portion of the property (Lot 11). Moritz Pond (Lots 8 and 13), which consists of 8 acres surrounded by wetlands, and a man-made pond (Lots 8, 9, and 10) consisting of approximately 1 acre, are located in the south-central portion of the property. Several small, intermittent streams are situated in low-lying areas of the property.

As described in Sections 4.3, 6.5, and 7.4, the Site has undergone environmental investigation and remediation from approximately 1992 through 2013. The Site was identified in the EDR database search as a Superfund Site. In addition, off-Site facilities with USTs and/or activities involving the generation of hazardous waste were identified in close proximity to the Site; however, none of the facilities were identified on any release-type databases (e.g., CERCLIS, LUST, VCP, Brownfields, etc.). Although the Site has a history of impacts to soil and/or groundwater from past dumping and wire-burning activities, based on the previous investigation and remediation activities conducted at the Site, VOCs at concentrations with the potential to create vapor intrusion have not been identified at the Site, and there does not appear to be a the potential for subsurface vapor conditions. One structure is located

on Lot 7 as part of the former driving range; however, the condition of the building is substandard and uninhabitable.

Compliance with the Connecticut Transfer Act (CTA) is required when ownership of a Hazardous Waste Establishment is transferred, according to Connecticut General Statutes (CGS) sections 22a-134 to 22a-134e. An Establishment is any real property at which or any business operation from which (a) on or after November 19, 1980, there was generated, except as the result of remediation of polluted soil, ground water or sediment, more than one hundred kilograms of hazardous waste in any one month, (b) hazardous waste generated at a different location was recycled, reclaimed, reused, stored, handled, treated, transported or disposed of, (c) the process of dry cleaning was conducted on or after May 1, 1967, (d) furniture stripping was conducted on or after May 1, 1967, or (e) a vehicle body repair facility was located on or after May 1, 1967.

Based upon the information reviewed as part of this assessment, it is not clear if the any of the lots on the Site meet the requirements set forth in the CTA to be considered an "Establishment" due to historic Site operations including waste burial and wire burning and recovery activities. In addition, no hazardous waste manifests or hazardous waste documentation was reviewed at the CTDEEP during this assessment that would indicate that the Site would be subject to the CTA. However, based on existing exemptions regarding the definition of a transfer under the Transfer Act, the Site would not likely be subject to the legal and technical requirements of the CTA in the event of a foreclosure and/or future sale by the Towns of Ashford and Willington.

12.2 HRECs

This assessment has revealed the following historical recognized environmental conditions (HRECs) in connection with the Site:

- A Supplemental Subsurface Investigation was conducted by GeoQuest in 2010 at the request of the CTDEEP to determine whether further remediation was necessary in the eastern and northern portions of the NWDA (Lot 11). Sampling points were identified based on the levels of antimony reported by Weston in a 2010 Removal Program Action Report. Based on the depth to bedrock encountered at 12 inches or less, 16 soil samples were collected from 0 to 6 inches and 6 to 12 inches whenever possible. Antimony was detected below RSR criteria in two of the soil samples analyzed. The report concluded that no further remediation was warranted in those portions of the NWDA.

  Subsequent correspondence from the CTDEEP to GeoQuest in 2011 served as an agreement that no further investigation was warranted beyond the perimeter of

the NWDA. The CTDEEP requested that the antimony be evaluated in terms of potential ecological exposure pathways in proximity to regulated wetlands. An Ecological Study was conducted by GeoQuest in 2011 to address CTDEEP's concerns. According to the report, low concentrations of antimony were detected below RSR criteria in soil samples collected from Lot 11 of the NWDA; however, the investigation concluded that no further investigation or remediation was warranted based on the extensive remediation previously conducted. Antimony is slightly soluble, and the distance from the wetlands to the soil with antimony detections made it unlikely for migration. GeoQuest concluded that antimony is not a carcinogen, and that remediation activities in the NWDA were successful in protecting the environment, specifically the wetlands. The CTDEEP accepted GeoQuest's analysis that there was unlikely adverse ecological effects to aquatic life from the antimony, and that no additional soil sampling or remediation was required.

12.3 RECs

This assessment has revealed the following recognized environmental conditions (RECs)/AOCs in connection with the Site:

- Based on previous investigations and documents on file with the Town of Ashford, the Town of Willington, and the CTDEEP, the Site has historically been utilized for solid waste disposal (Lots 3, 6, 7, 8, 9, 10, 11, 13, and 19) with wire burning activities on Lot 11. A CTDEEP lien and an EPA lien are in place associated with environmental cleanup requirements, for which compliance has not been achieved.

- According to previous investigations, and on-Site observations, a man-made pond is located in the south-central portion of the Site on Lots 8, 9, and 10. Previous surface water sampling events did not detect any COCs above RSR criteria; however, sediment samples had detections of chromium, nickel, and mercury exceeding the NOAA Screening Quick Reference Table (SQuiRT) threshold limits.

This assessment has identified the following areas of concern (AOCs) for the Site:

- AOC-1A, AOC-1B, AOC-1C: Lot 11, outside of the NWDA, and Lot 11A have not been investigated in accordance with the CTDEEP Order.

- AOC-2: The NEDA (Lot 13 - Ashford); This area was historically excavated and backfilled with materials of unknown origin. Limited investigations were conducted in this area.

- AOC-3: The NCDA (Lot 19 - Ashford): Materials identified in this area included a car engine, two car doors, remains of drums, metal debris, old appliances, drums, and a water heater. Investigations were conducted in this area.

- AOC-4: Moritz Pond (Lot 19): Historical reports indicate that there was a sand and gravel pit and evidence of dumping at the perimeter of Moritz Pond. Disturbed areas can be seen in the 1969 and 1970 aerial photographs at the northwest and east/southeast borders of the pond. Limited investigations were conducted in this area.

- AOC-5: North of the SCDA (Lot 19 - Ashford): Several areas of stressed vegetation and/or exposed soil were identified through the drone photographs.

- AOC-5, AOC-6: The SCDA (Lots 6, 7, 8, 9, and 10 - Ashford): Previous investigations identified potential trenching for the burial of waste, a soil pile, metal debris, and a test pit.

- AOC-7: Man-made pond (Lots 8, 9, and 10 - Ashford): Surficial solid waste was observed in this area. Aerial photographs from 1970 and 1986 show disturbed soil around the pond, specifically northwest of the pond. Aerial photographs from 1986 and 1997 show disturbed soil east and southeast of the pond. Sediment samples had detections of chromium, nickel, and mercury exceeding the NOAA SQuiRT threshold limits.

12.4 BERs/De Minimis Conditions

This assessment has revealed the following business environmental risks (BERs)/de minimis conditions in connection with the Site:

- The presence of scrap metal debris observed in the NWDA (Lot 11).

- The presence of mapped and/or suspected wetlands on Lots 3, 6, 7, 8, 11, 13, and 19 of the Site.

12.5 Recommendations

BL Companies recommends completion of additional investigation of soil, groundwater, surface water and sediment in accordance with our proposed Sampling Plan that will be submitted under separate cover.

In addition, BL Companies recommends a legal opinion regarding the Site's status under the Connecticut Transfer Act.

13.0 LIMITATIONS

The assessment of the current condition of the Site is based on visually discernible conditions found at the Site on the dates and at the locations specified and does not include the removal of any soil, water, or air samples, the moving of furniture or fixtures, or any type of inspection that would require extraordinary effort to access. The conclusions and recommendations stated herein are based solely on the information described in this Report.

An independent data research company provided the environmental database report referenced in this ESA. Surrounding properties were listed within specific approximate minimum search distances intended to meet the requirements of ASTM E-1527-13. The information provided within the environmental database report was assumed to be correct and complete unless obviously contradicted by BL Companies' observations or other credible referenced sources reviewed/interviewed during this assessment. Although every attempt has been made, the accuracy of federal, state, and tribal database searches cannot be assured.

Since subsurface exploration, observation, and sampling are beyond the scope of a Phase I ESA, no statements can be made concerning the condition of ground water or subsurface soils beneath the Site. No attempt was made to confirm the compliance of past or present owners or operators of the Site with federal, state, or local laws concerning land usage. Unless specific documentation or evidence indicates that off-site sources have impacted the Site, certainty that such impact has or has not occurred cannot be provided without on-site testing. Conclusions regarding the potential for off-site sources to impact the Site are based upon inferred ground water flow, which is based on surficial topography.

Latent conditions and other information may become evident in the future based on currently unavailable evidence. BL Companies assumes no responsibility for such conditions, or for the inspection, engineering, or repair, which might be required to discover or correct such factors. Should such evidence arise, it should be forwarded to BL Companies so that the conclusions and recommendations of this Report may be modified as necessary. In addition, changes in the applicable or appropriate standards may occur, whether they result from legislation, regulation or judicial decisions, from the broadening of knowledge or from other reasons. Accordingly, the findings of the Report may be invalidated wholly or partially by changes outside the control of BL Companies.

This ESA is not intended to address Site compliance with federal, state or local regulations.

No ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property, and this practice recognizes reasonable limits of time and cost.

The innocent landowner, contiguous owner and prospective purchaser defenses to liability under CERCLA require that a person acquiring property conduct all appropriate inquiry with respect to the Site. BL Companies has conducted this environmental assessment in accordance with the requirements of ASTM E-1527-13. Those standards require the application of scientific principles and professional judgment to certain facts with resultant subjective interpretations and exercise of discretion. Professional judgments expressed herein are based on the facts currently available within the limits of the existing data, and data gaps identified herein, scope of work, budget, and schedule. Those standards also require that the Client undertake certain additional inquiries. In addition, the liability defenses under CERCLA require, among several other things, that the Client, after the acquisition, stop any continuing releases, prevent any future threatened releases and prevent or limit human, environmental, or natural resource exposure to any hazardous substance released at the Site. BL Companies makes no warranties, expressed or implied, including, without limitation, warranties as to merchantability or fitness for a particular purpose, including any warranty that this Phase I ESA will in fact qualify the Client for the innocent landowner, contiguous property owner or prospective purchaser defense to liability under CERCLA.

BL Companies represents that the work was performed using the degree of care and skill ordinarily exercised under normal circumstances by professional consultants practicing in the locality of the Site or similar localities.

Non-scope considerations (as addressed in Section 13 and Appendix X5 of ASTM E-1527-13) include, but may not be limited to, ACMs, LBP, PCB-containing building materials, wetlands, mold, radon, and lead in drinking water. These non-scope items are beyond the scope of ASTM E-1527-13 and were not addressed by this study unless specified in Section 2.3. Observations of non-ASTM considerations were limited to those portions of the Site that were readily visible and accessible at the time of the reconnaissance. Furthermore, the determination of the likelihood of the presence of ACMs and/or LBP is based largely on the estimated age of the structure(s). Where visual observations are included in the Report, they represent conditions at the time of reconnaissance, and may not be indicative of past or future conditions.

14.1 Signatures

This assessment was conducted by the individuals identified below. Professional resumes for these individuals are attached (see Qualifications appendix).

Site Assessor/Author:

Carol D. Smith
Project Scientist

Senior Author/Reviewer:

Samuel Haydock
Director, Client Relations and Business Development

14.2 Certification by the Environmental Professional(s)

We declare that, to the best of our professional knowledge and belief, we meet the definition of an EP as defined in Section 312.10 of 40 CFR 312, and we have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the Site. We have developed and performed all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

All Appropriate Inquiries (AAI) Final Rule, 40 CFR 312.

American Society for Testing and Materials, Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process; Designation E1527-13.

Environmental Data Resources, Inc., (EDR), www.edrnet.com, provider of:

- Regulatory database search (RadiusMap Report).
- Historical topographic maps.
- Historical aerial photographs.
- Sanborn Fire Insurance maps.
- City street directories.

Google Earth, provider of satellite imagery and geolocation services, www.google.com/earth.

Rogers, John, Bedrock Geological Map of Connecticut, USGS, 1985.

USDA, National Resources Conservation Service, Web Soil Survey, http://websoilsurvey.nrcs.usda.gov/app/WebSoilSurvey.aspx.

United States Department of Interior, Fish and Wildlife Service, National Wetland Inventory Map, http://www.fws.gov/wetlands/Data/Mapper.html.

Agencies

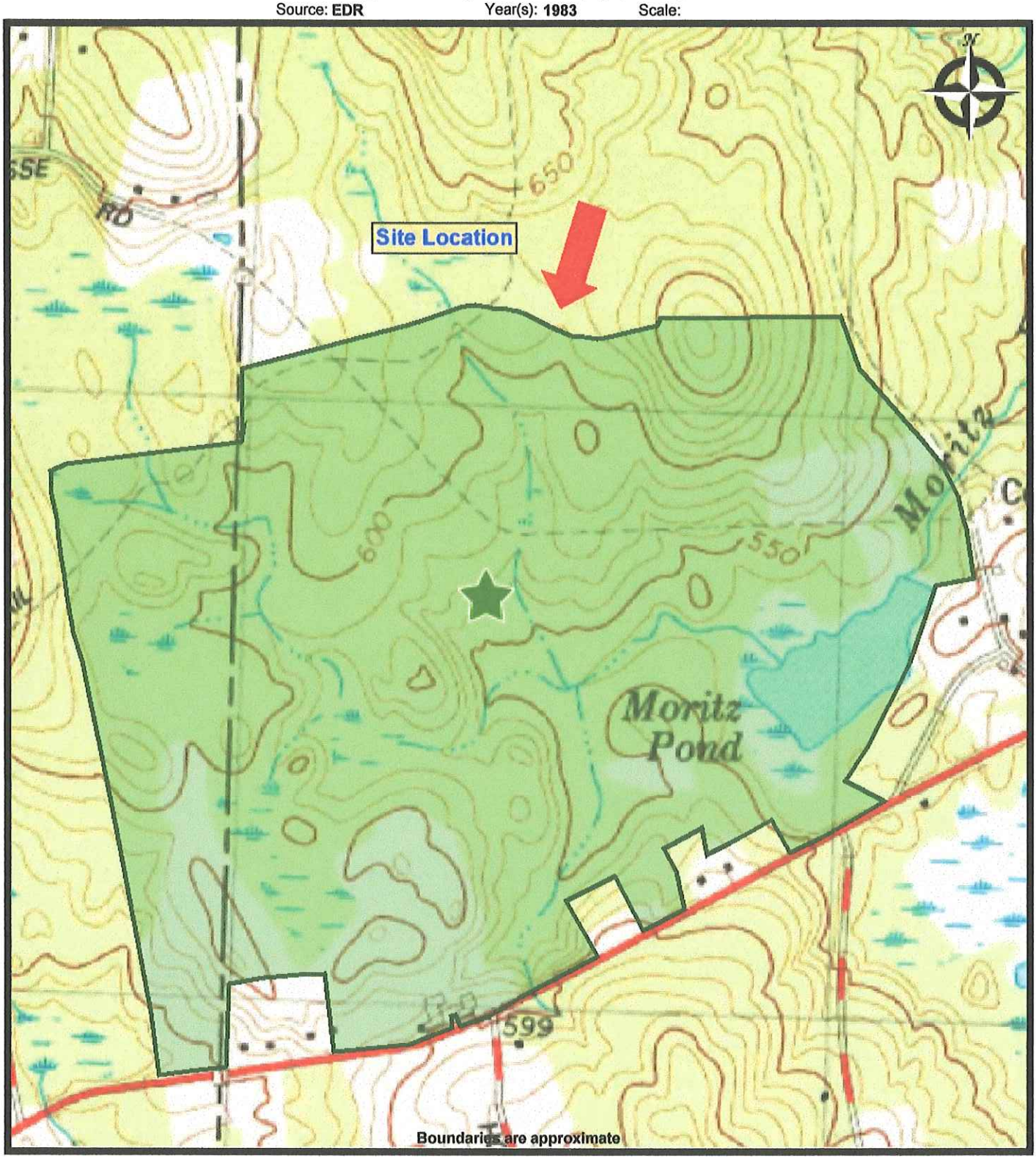
Ashford Town Departments
Willington Town Departments
Connecticut Department of Energy and Environmental Protection

Personal Contacts

Ms. Christine Abikoff, Town of Ashford

ACM - Asbestos Containing Material
AST - Aboveground Storage Tank
ASTM - American Society of Testing and Materials
AULs - Activity and Use Limitations
BER - Business Environmental Risk
BTEX - Benzene, Toluene, Ethylbenzene, and Xylenes
CERCLA - Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERCLIS - Comprehensive Environmental Response, Compensation, and Liability Information System
CESQG - Conditionally Exempt Small-Quantity Generator
COC - Chemical of Concern
CORRACTS - facilities subject to corrective action under RCRA
CREC - Controlled Recognized Environmental Condition
DNAPL - Dense Non-Aqueous Phase Liquid
EC - Engineering Control
EP - Environmental Professional
EPA - United States Environmental Protection Agency
ERNS - Emergency Response Notification System
ESA - Environmental Site Assessment
FOIA - Freedom of Information Act
FINDS - EPA\'s Facility Index System
HREC - Historical Recognized Environmental Condition
HSCA - Hazardous Sites Cleanup Act
IC - Institutional Control
LBP - Lead Based Paint
LQG - Large-Quantity Generator
LNAPL - Light Non-Aqueous Phase Liquid
LUST - Leaking Underground Storage Tank
MSDS - Material Safety Data Sheet
MTBE - Methyl tert-butyl ether
NFA - No Further Action
NFRAP - former CERCLIS sites where no further remedial action is planned under CERCLA
NPDES - National Pollutant Discharge Elimination System
NPL - National Priorities List (a.k.a., Superfund)
OPRA - Open Public Records Act
OWS - Oil-Water Separator
PAHs - Polynuclear Aromatic Hydrocarbons
PCBs - Polychlorinated Biphenyls
RCRA - Resource Conservation and Recovery Act
RCRAGN - RCRA hazardous waste generator
REC - Recognized Environmental Condition
SARA - Superfund Amendments and Reauthorization Act of 1986
SEMS - Superfund Enterprise Management System
SHW - State Hazardous Waste
SQG - Small-Quantity Generator
SVOCs - Semi-Volatile Organic Compounds
SWLF - Solid Waste Landfill
TSDF - hazardous waste Treatment, Storage, or Disposal Facility
USDA - United States Department of Agriculture
USGS - United States Geological Survey
UST - Underground Storage Tank
VEC - Vapor Encroachment Condition
VES - Vapor Encroachment Screening
VOCs - Volatile Organic Compounds
VCP - Voluntary Cleanup Program

Image Provided By EDR USGS Topographic Maps
Source: EDR Year(s): 1983 Scale:



Architecture
Engineering
Environmental
Land Surveying
BL Companies

FIGURE 1 - SITE LOCATION MAP
THE CADLEROCK PROPERTY
Ashford and Willington
Ashford, Connecticut 06278

PREPARED FOR:
DRAWN BY: Carol Smith **DATE: 8/2/2018**
IMAGE YEAR: 1983 **PROJ. #: 18L6002**