

# **SOIL CHARACTERIZATION INVESTIGATION REPORT**

**Merchant's Row Redevelopment Project  
Barre, Vermont 05641**

**Prepared for:**

**Janet E. Shatney  
Director of Planning, Permitting & Assessing Services  
City of Barre  
City Hall  
6 North Main Street, Suite 7  
Barre, Vermont 05641**

**VHB Project No. 58341.00**

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**Prepared by:**



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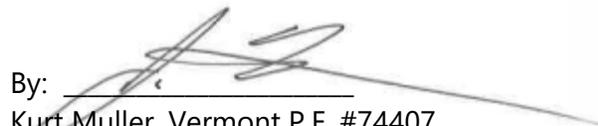
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## CERTIFICATION

This Soil Characterization Investigation Report was prepared under my direction and describes investigation activities performed in support of the Merchant's Row Redevelopment Project, located in Barre, Vermont.

The investigation was conducted in accordance with VHB's *Work Plan for Soil Characterization Assessment* dated April 17, 2019 (the Work Plan). The Work Plan was reviewed by the Vermont Department of Environmental Conservation (VTDEC) prior to the investigation.

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

By:   
Kurt Muller, Vermont P.E. #74407  
Senior Environmental Engineer  
VHB

Date: 08/23/2019

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## EXECUTIVE SUMMARY

VHB (formerly The Johnson Company or "JCO") was retained by The City of Barre (The City) of Barre, Vermont (BPRW) to perform a supplemental soil characterization investigation at the location of the Merchant's Row Redevelopment Project (the Project area) in Barre, Vermont. The Project area is approximately 2.5 acres comprised of portions of multiple parcels and is currently used as a parking lot and associated driveways. The Project area is bound to the east and northeast by buildings along North Main Street, to the northwest by Depot Square, to the south by Prospect Street, and to the southwest by a railroad corridor. The latitude/longitude of the center of the Project area is [44.197648°, -72.502903°]. Historical use of Merchant's Row and adjacent properties include many commercial and industrial enterprises such as, granite manufacturers, automotive service stations, dry cleaners, and a manufactured gas plant. The current property owner (The City) is interested in redeveloping the existing parking area and associated driveways.

The specific objectives of this soil investigation were to provide the City with data regarding the presence, or lack thereof, of soil impacts at the Project area in order to identify any potential exposure risk to construction workers and the populace of Barre and to ascertain appropriate strategies for the management of soil generated during construction. This investigation focused on evaluating soils that were not previously characterized in areas that are most likely to be disturbed in the Project area. Furthermore, this investigation was not intended to determine the full nature and extent of potential impacts to soil or other media, nor was it intended to entirely satisfy the pre-approval requirements for all soil that may be proposed for offsite disposal at a certified landfill.

The investigation was performed in accordance with VHB's *Work Plan for Soil Characterization Assessment* dated April 17, 2019 (the Work Plan). This investigation included the advancement of 10 soil borings for soil screening, sampling, and analysis. Two (2) of the 10 soil borings were advanced at the north end of the Project area to evaluate polycyclic aromatic hydrocarbons (PAH) concentrations in the material below the "black ash material" identified during a Targeted Brownfields Assessment Phase II Investigation conducted in 2012 by Nobis Engineering, Inc. (Nobis). Two (2) of the 10 soil borings were advanced at the center of the Project area to evaluate PAH and lead concentrations in the 0 to 3 feet below ground surface (fbgs) depth interval and the remaining 6 of the 10 soil borings were advanced at the south end of the Project area to collect soil samples from the 3 to 4.5 fbgs depth interval. Two, 3-part composite samples were created with the soil samples collected from the south end of the Project area and were analyzed for volatile organic compounds (VOCs), semi-VOCs (SVOCs), RCRA8 metals, polychlorinated biphenyls (PCBs), and herbicides. Following review of the preliminary analytical results, the subsamples of one of the composite samples were analyzed for tetrachloroethene (PCE) and PAHs. Two samples collected from the Project area were also analyzed for pesticides. Finally, the two samples with the most elevated benzo(a)pyrene (BaP) concentrations were also analyzed for BaP via the Synthetic Precipitation Leaching Procedure (SPLP).

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Based on field observations and analytical data collected during this investigation and review of available historical documentation including the 2012 Nobis investigation, VHB provides the following conclusions and recommendations:

- No visual, olfactory, or photoionization detector (PID) screening evidence of petroleum or other VOC impacts to soil were detected in any of the 10 soil borings advanced at the Project area on May 21, 2019. Visual observations of non-petroleum impacts included trace to some amounts of coal, concrete, metal and brick fragments, and trace amounts of ash. Darker colored strata were observed at select locations and were associated with higher concentrations of coal fragments and coal dust.
- Analytical results from both the 2012 Nobis and this 2019 VHB investigation reported no detections of non-PAH SVOCs, metals, PCBs, pesticides, or herbicides at concentrations exceeding their respective regulatory standards.
- Based on the laboratory analytical results for this study and the analytical results from the 2012 Nobis investigation, PAHs are the primary contaminant of concern. PAHs were detected at concentrations greater than the Vermont Urban Background Soil Concentration in 5 out of 9 soil samples collected from the Project area during this investigation and in 7 out of 24 discrete soil samples collected from the Project area during the 2012 Nobis investigation. PAH impacts generally do not appear to be associated with a particular depth or location and appear to be associated with fill that was placed at the Project area based on the anthropogenic debris that was inconsistently observed at various depths and locations. PAH impacts at the north end of the Project area appear to be associated with the "black ash material" that was identified in shallow soil at various depths and thicknesses.
- SPLP analytical results for BaP indicated that elevated BaP concentrations in Project area soil may pose a risk to groundwater. BaP concentrations in groundwater at the Project area are unknown.
- PCE was detected in only one discrete sample during this investigation at a concentration exceeding the residential Vermont Soil Standard (VSS), but less than the non-residential VSS. No other VOC exceedances of residential or non-residential VSSs or EPA Regional Screening Levels (RSLs) were identified during this 2019 VHB investigation. Analytical results for VOC analysis of the soil samples collected during the 2012 Nobis investigation reported no VOC exceedances of residential or non-residential/industrial soil screening values (SSVs).

## **RECOMMENDATIONS**

Soil impacts consist of PAHs at select locations throughout the Project area and PCE at one location near the southeast end of the Project area. The impacted soil is currently isolated under an impervious surface and, therefore, poses no direct contact risk to the public. The elevated BaP concentrations in soil are unlikely to impact groundwater because the impacted soil is located beneath impervious pavement, and, therefore, precipitation infiltrate is unlikely to contact or mobilize the soil-bound BaP. Additionally, the impacted soil is located in the shallow unsaturated

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zone which does not directly contact groundwater. Confirmatory groundwater sampling for BaP near the location where the SPLP soil samples were collected is recommended to confirm no BaP groundwater impacts exist.

This Soil Characterization Investigation was performed to supplement the 2012 Nobis investigation and to obtain analytical results for soil that is likely to be disturbed during potential redevelopment activities associate with the Project. Supplemental soil sampling is recommended at depths and locations of excavations for the reconstruction or installation of specific features that are proposed as part of the Project (e.g.: utility trenches, catch basins, or significant roadway cuts) to better evaluate the PAH or PCE concentrations in soil that will be disturbed and to determine the potential reuse options for soil that will be disturbed during the Project. If offsite disposal of impacted soil is required due to proposed grade changes or because material is structurally unsuitable for reuse, full characterization of material representative of what may need to be sent to a certified landfill would be required at an interval of one sample for every 200 tons in Vermont or one sample per 500 tons in New York.

Through careful planning it is possible that the material that does not exceed the Vermont Urban Background Concentration for PAHs could be disposed of at a low cost within an "urban background area" as defined by the VT ANR Natural Resources Atlas tool. This approach could generate capacity for material that exceeded the Vermont Urban Background Soil Concentration for PAHs and, therefore, allow it to remain onsite and ultimately be isolated under a VTDEC approved barrier, should it be shown that the elevated BaP concentrations will not impact groundwater.

## 1.0 INTRODUCTION AND BACKGROUND

### 1.1 Introduction

VHB was retained by The City to perform a supplemental soil characterization investigation at the location of the Project area in Barre, Vermont. The soil characterization investigation was designed to assess the gaps in existing soil data in areas that will potentially be disturbed during the redevelopment, and was performed in accordance with the Work Plan.

### 1.2 Project Area Description

The Project area is approximately 2.5-acres comprised of portions of multiple parcels (latitude 44.197648°, longitude -72.502903° at Project area center), and is currently owned by the City, whose contact information is summarized in the table below. The Project area is bound to the east and northeast by North Main Street, to the northwest by Depot Square, to the south by Prospect Street, and to the southwest by a railroad corridor. The Project area is currently used as a parking lot and associated driveways. The location of the Project area relative to its surroundings is shown on **Figure 1**.

Historical use of Merchant's Row and adjacent properties, as identified in an area wide assessment (AWA) for the Project area prepared by Stone Environmental, Inc. in September 2011, include many commercial and industrial enterprises such as, granite manufacturers, automotive service stations, dry cleaners, and a manufactured gas plant (see Section 1.3). With such an industrious past there was also historic railroad traffic likely used to transport materials to and from these enterprises. The Stevens Branch of the Winooski River previously passed through the Project area (Stone, 2011). After the course of the river changed, the former river channel was filled with soil of unknown quality or origin. The former and current locations of Stevens Branch are shown on **Figure 2**.

Multiple investigations have been conducted adjacent to and within the Project area and are described in Section 1.3. VHB understands that the objective of this soil characterization was to provide the City with soil data to address gaps in the existing soil data within the Project area boundaries regarding the presence, or lack thereof, of soil impacts at the Project area. These soil data will be used to establish options for management of soil generated during proposed reconstruction of the parking lot.

#### Information for Current Property Owner

| Role                        | Name                                | Address   | Email                     | Phone          |
|-----------------------------|-------------------------------------|---|---------------------------|----------------|
| Property Owner and Operator | City of Barre<br>(Janet E. Shatney) | City Hall<br>6 North Main Street<br>Suite 7<br>Barre, Vermont 05641 | PPADirector@barrecity.org | (802) 476-0245 |

### 1.3 Previous Investigations

Numerous environmental investigations have been performed at sites adjacent to the Project area and one of these investigations extended onto the Project area. In 2012, Nobis Engineering, Inc. (Nobis) conducted a Targeted Brownfields Assessment Phase II Investigation which included characterization of a large portion of soil in the Project area. Spatially representative soil samples were collected in a grid pattern and analyzed for almost all the environmental contaminants that are typically identified in urban soils.

A summary of the existing soil data from the 2012 Nobis investigation is described below and is presented in **Figure 2**. As shown, Nobis collected soil samples from the north end of the Project area to a depth of 2 fbg and in the middle and south end of the Project area to a depth of 3 fbg and analyzed for VOCs, SVOCs, PCBs, herbicides and metals. Results are listed below:

- No PCB detections.
- No herbicides detected above Vermont's applicable screening criterion.
- No metals detected above Vermont's applicable screening criterion.
- VOC soil results were below screening criterion except for one sample that reported PCE at a concentration of 1.5 mg/kg, exceeding the applicable residential SSV of 1.46 mg/kg at the time, at the south end of the Project area near the Bonacorsi & Sons Property. This elevated PCE detection was expected considering the known extents of soil, soil vapor, and groundwater PCE contamination associated with the former dry-cleaning operation at the Bonacorsi & Sons Property. As of July 6, 2019, VTDEC has revised the residential SSV for PCE to 2.4 mg/kg; therefore, this PCE exceedance previously reported by the 2012 Nobis investigation is no longer considered an exceedance.
- SVOC soil results were below screening criteria with the exception of PAHs, a sub-set of SVOCs, which exceeded the Vermont Department of Environmental Conservation (VTDEC) Urban Background Soil Concentration in approximately one-third of the samples analyzed. Because this Project area is located in an "Urban Area" as mapped by the Vermont Agency of Natural Resources (VTANR) Natural Resources Atlas map, the resulting BaP toxic equivalent quotient (TEQ) value is compared to the VTDEC Urban Background Soil Concentration and not the residential VSL. PAHs and BaP-TEQ, a subset of PAHs, are a by-product of the combustion of hydro-carbons and are therefore contaminants commonly associated with urban areas, historical fill, and railroad operations, all of which are present at the Project area. **Figure 2** also shows the former location of the Stevens Branch riverbed, an area which was filled with soil of unknown quality or origin, after the course of the river changed.

Considering these data are relatively recent and reportedly incorporate appropriate sampling and quality control protocol, they were considered representative of existing soil conditions and were therefore used to identify data gaps and supplement the data that was generated during this soil characterization assessment.

An AWA that encompassed the Project area and adjacent properties was prepared by Stone Environmental, Inc. in September 2011. The objective of the AWA was to identify potentially impacted areas in the vicinity of the Merchants Row Redevelopment Area. VHB prepared an Area

Wide Assessment Addendum (AWA Addendum, dated March 26, 2019), which includes additional information obtained since the initial AWA was issued. The AWA Addendum was submitted to VTDEC on April 30, 2019.

VHB used the representative soil data from prior investigation and information obtained from the preparation of the AWA Addendum to determine where data may be missing and prescribe the sample locations and necessary analyses that were proposed in the Work Plan.

#### **1.4 Soil Characterization Investigation Objective**

The specific objectives of this investigation were to provide the City with soil data regarding the presence, or lack thereof, of soil impacts at the Project area in order to identify any potential exposure risk to construction workers and the populace of Barre and to ascertain appropriate strategies for the management of soil generated during construction.

This investigation focused on evaluating soils that were not previously characterized in areas that are most likely to be disturbed in the Project area. This investigation, however, was not intended to determine the full nature and extent of potential impacts to soil or other media, nor was it intended to entirely satisfy the pre-approval requirements for all soil that may be proposed for offsite disposal at a certified landfill.

### **2.0 INVESTIGATION METHODOLOGY AND RESULTS**

To better assess the extent of and risks posed by potential soil impacts related to the former use of the Project area and adjacent properties (see Section 1.3) and to meet the objectives presented in Section 1.4, VHB evaluated soil that is representative of material that may be disturbed during construction. Prior to the start of intrusive activities at the Project area, VHB conducted a pre-mark for DigSafe and obtained a DigSafe ticket as required by Vermont law. In addition, VHB met with a City employee to discuss the proposed boring locations in relation to subsurface utilities and parking spaces. The locations of a few proposed soil borings were slightly adjusted to avoid utility corridors and the City placed cones in parking spots to reserve access to the proposed soil boring locations.

#### **2.1 Applicable Screening Levels**

Current reuse plans for the Project area are in the development phase; however, it is anticipated that the property will be rehabilitated to include parking, driveways, and green space for the City, classifying the Project area as "industrial/non-residential". Considering the proposed reuse scenario, industrial/non-residential soil screening values (SSV) are appropriate; however, if the zoning for the Project area is considered to be of mixed-use and include some residential use, the residential SSVs, may selectively be applied. As such, soil data were compared to the May 2019 EPA RSLs for both residential and industrial soil and residential and non-residential VSSs presented in VTDEC's July 6, 2019 *Investigation and Remediation of Contaminated Properties Rule* (IRule).

In addition, the PAH soil concentrations were used to calculate the BaP -toxicity equivalence (TEQ). The BaP-TEQ was calculated by summing the product of the detected concentrations for each of the PAHs with the corresponding BaP toxicity equivalence factor (TEF). For the purposes of this calculation, non-detect results were assumed to be one-half of the detection limit. The BaP-TEQ values were compared to the VTDEC Urban Background Soil Concentration value of 0.58 mg/kg because the Project area is located with an “urban area” as defined by the Vermont Agency of Natural Resources (VT ANR) Natural Resource Atlas.

SPLP analysis simulates the potential for contaminants in soil to mobilize when exposed to precipitation infiltrate and generates the resulting aqueous concentration of the analyzed contaminants. The SPLP analysis is a low-cost alternative to installing and sampling groundwater monitoring wells to evaluate the potential for soil contamination to impact groundwater and is a required analysis in order for VTDEC to approve the relocation of PAH impacted soils that exceed the applicable standard to be relocated and reused onsite. Analytical results for the SPLP analysis, performed only for BaP, were compared against the Vermont Groundwater Enforcement Standard (VGES) for BaP to evaluate if the elevated concentrations of BaP identified in Project area soil posed a risk to groundwater. BaP is the only PAH-analyte with a VGES. Analytical results are discussed in Section 2.2.2.

Landfills require Toxicity Characteristic Leaching Procedure (TCLP) analysis to confirm their liquid leachate generated by these soils will not exceed hazardous levels. Therefore, analytical results for analytes that have a TCLP Regulatory Level were divided by 20 per the “Rule of 20” and compared against the TCLP Regulatory Level to determine if the TCLP analysis was required, should the sampled soil require offsite disposal. No samples required TCLP analysis as discussed in Section 2.2.2.

## **2.2 Soil Screening and Sampling**

In order to evaluate for potential soil impacts, soil borings were advanced to screen and sample soil at locations that were anticipated to be disturbed during construction and that were not previously sampled during prior investigations (see Section 1.3).

### **2.2.1 Methodology – soil screening and sampling**

On May 21, 2019, Eastern Analytical, Inc. (EAI) of Concord, NH, with VHB oversight, advanced 10 soil borings at three different areas of the Project area (north end, center, south end). Four (4) of the 10 soil borings were advanced to termination depths of 3 fbg, 2 of these 4 soil borings were located at the north end of the Project area, and 2 soil borings were located at the center of the Project area. The remaining 6 of the 10 soil borings were advanced to termination depths of 5 fbg at the south end of the Project area. The locations and termination depths of these soil borings were pre-determined to collect additional environmental soil data where samples were not collected or particular analytes were not analyzed during prior investigations. The rationale for the soil boring locations and termination depths are provided in the Work Plan. Soil boring locations are shown on **Figure 2**.

A direct push, track-mounted Geoprobe drill rig equipped with dual tube sampling equipment was used to advance the borings and soil cores were extracted using dedicated butyrate liners. The soils were screened for the presence of VOCs with a field calibrated PID. To PID field screen the soil, a decontaminated stainless-steel tool was used to make a small space in the soil core and the PID probe was immediately inserted into the void. A VHB field geologist recorded geologic characteristics, visual/olfactory observations, PID readings, and tactile features on dedicated soil boring logs (see **Appendix A**). Decontamination of metal tools, used during the PID screening process, was accomplished by wiping off gross amounts of soil, washing with Alconox soap, and rinsing with deionized water. Dedicated butyrate liners and nitrile gloves were used to handle the extracted soil cores.

Immediately after PID screening, the appropriate sample containers were filled with soil samples that were collected from the extracted soil cores, starting with the container for VOCs. A multi-part aliquot system with methanol preserved vials was utilized to minimize the loss of VOCs for the composite samples. This approach is described in greater detail below.

All analytical samples were placed in an ice-filled cooler and transported to Eastern Analytical, Inc. of Concord, New Hampshire (EAI) for laboratory analysis. Once soil screening and sample collection were complete, the remaining soil was returned to the respective borehole and bagged sand was used to fill the remainder of the borehole to the base of the surrounding pavement or ground surface. An asphalt cold patch surface completion was installed at each soil boring that was advanced through the paved parking lot to match the surrounding grade of the pavement. VHBs GPS was used to record the locations of the soil borings.

Soil samples were collected from the soil borings at pre-determined depths at various locations within the Project area. The soil sample depth intervals and analyte lists are described by location below.

### **North End of Project Area**

At the north end of the Project area, the Work Plan stated that two discrete soil samples would be collected from the depth interval below the “black ash material” identified in the soil core and above 1.5 fbgs. However, observations made in the field identified “black ash material” in soil boring SB-1 extending to a depth of 2.2 fbgs. The purpose of soil sampling in this area was to generate analytical data for the material immediately underlying the “black ash material”; therefore, the soil sample at this location (SB-1 (2.2-3)) was collected from 2.2 to 3 fbgs. A soil sample collected from the 0.5 to 1.5 fbgs depth interval (SB-1 (0.5-1.5)), representing the “black ash material” was also analyzed to correlate analytical results representative of the “black ash material”. The “black ash material” extended to a depth of 1 fbgs in soil boring SB-2; therefore, the sample of the material underlying the “black ash material” was collected from the 1 to 1.5 fbgs depth interval (SB-2 (1-1.5)). The samples collected from the north end of the Project area were analyzed for PAH analysis, per the Work Plan.

### **Center of Project Area**

Per the approved Work Plan, 2 discrete soil samples (SB-3 (0-3) and SB-4 (0-3)) were collected within the 0 to 3 fbg depth interval at the center of the Project area and analyzed for PAHs and lead.

### **South End of Project Area**

Two, 3-part composite samples were created from soil collected within the 3 to 4.5 fbg depth interval from the 6 soil borings at the south end of the Project area. One composite sample was created with material collected from three soil borings advanced along the west portion of the south end of the Project area (Comp 5,6,7 (3-4.5)) and one composite sample was created with material collected from three soil borings advanced along the east portion of the south end of the Project area (Comp 8,9,10 (3-4.5)). To create the composite samples, approximately equal volumes of sub-sample material (with the exception of sample material for volatiles analyses) were placed in a zip-lock bag, homogenized, and a composite sample (three-part) was created representing the desired sample depth interval. Samples for VOC analysis were composited by placing approximately equal volumes of soil collected directly from the soil core at each sub-sample location into the methanol preserved vial, as opposed to introducing it to a zip-lock bag where volatiles could be lost.

Both composite samples were analyzed for VOCs via EPA Method 8260C, SVOCs via EPA Method 8270D, RCRA 8 metals via EPA Method 6020, PCBs via EPA Method 8082A, and herbicides via EPA Method 8151A. Per the Work Plan, if elevated levels of contaminants were identified in a composite sample, its sub-samples would be analyzed for those contaminants. Subsamples SB-8 (3-4.5), SB-9 (3-4.5), and SB-10 (3-4.5) from composite sample Comp 8,9,10 (3-4.5) were analyzed for PCE via EPA Method 8260C and PAHs via EPA Method 8270D. Analytical results are discussed in Section 2.2.2. The Work Plan also stated that if soil in a particular location was not homogenous and PID, visual, and/or olfactory evidence of impacts were observed, a discrete sample representing this anomalous condition would be collected and analyzed separately from the composite sample. No anomalous conditions were identified in any of the six sub-sample soil borings; therefore, no discrete samples of anomalous conditions were collected.

### **Contingency TCLP and SPLP Analyses**

Additional sample material from each of the two composite samples and all of the discrete samples were collected and placed "on-hold" at the laboratory for contingency TCLP and SPLP analysis pending receipt of the composite analytical results.

No analytes exceeded their TCLP Regulatory Level by 20 times; therefore, no samples were analyzed via TCLP analysis. As previously mentioned in Section 1.3, the soil PAH results from the 2012 Nobis investigation reported BaP at concentrations exceeding the VTDEC Urban Background Soil Concentration of 0.58 mg/kg; therefore, the Work Plan stated that the two samples with the highest BaP concentrations would be analyzed for BaP via SPLP. The two samples with the highest BaP concentrations, samples SB-3 (0-3) and SB-4 (0-3), were analyzed for BaP via SPLP. Analytical results are further discussed in Section 2.2.2.

Per the Work Plan, one of the two composite samples (Comp 5,6,7 (3-4.5)) and one of the four discrete samples (SB-2 (1-1.5)) were also analyzed for pesticides via EPA Method 8081B.

## **2.2.2 Results – soil screening and sampling**

The soils immediately underlying the pavement or from ground surface at locations without “hardscape” were comprised of brown sand and gravel with trace to some coal, concrete, metal and brick fragments, and trace amounts of ash. This material extended to depths ranging from 1 fbgs in select borings to a maximum observed depth of 5 fbgs, the termination depths of the deeper soil borings advanced at the south end of the Project area. Soil borings that extended deeper through this shallow layer encountered a brown, coarse to fine sand with varying amounts of gravel and silt. Groundwater was not encountered in any of the soil borings advanced during this investigation; soil borings did not extend deeper than 5 fbgs, per the Work Plan.

The PID field screening results for the soil encountered in the 10 soil borings were all 0.0 parts per million by volume (ppmv) above a background value of 0.1 ppmv.

### **North End of Project Area**

Analytical results for samples collected from the north end of the Project area reported PAHs (as expressed by the BaP-TEQ) at concentrations less than the VTDEC Urban Background Soil Concentration of 0.58 mg/kg in the material underlying the “black ash material”. Specifically, analytical results for sample SB-1 (2.2-3) reported PAHs at a concentration of 0.33 mg/kg and PAHs (as expressed by the BaP-TEQ) were not detected in sample SB-2 (1-1.5) at concentrations exceeding laboratory reporting limits. Analytical results for the sample collected from the “black ash material” (SB-1 (0.5-1.5)) reported PAHs (as expressed by the BaP-TEQ) at a concentration of 2.13 mg/kg, exceeding the VTDEC Urban Background Soil Concentration of 0.58 mg/kg.

No pesticides were reported at concentrations exceeding laboratory reporting limits in sample SB-2 (1-1.5).

### **Center of Project Area**

Analytical results for samples SB-3 (0-3) and SB-4 (0-3), collected from the center of the Project area, reported PAHs (as expressed by the BaP-TEQ) at concentrations of 4.90 mg/kg and 5.72 mg/kg, respectively, exceeding the VTDEC Urban Background Soil Concentration of 0.58 mg/kg. Lead was not detected at concentrations greater than the residential RSL or the TCLP Regulatory Level for lead multiplied by 20 (100 mg/kg).

### **South End of Project Area**

Results of the SVOC analysis reported that non-PAH SVOCs were not detected at concentrations exceeding the residential or non-residential/industrial SSVs in either of the two composite samples collected from the South End of the Project area (Comp 5,6,7 (3-4.5) and Comp 8,9,10 (3-4.5)). PAHs (as expressed by the BaP-TEQ) were identified at a concentration of 0.26 mg/kg in sample Comp 5,6,7 (3-4.5), less than the VTDEC Urban Background Soil Concentration of 0.58

mg/kg. PAHs (as expressed by the BaP-TEQ) were detected at concentrations exceeding the VTDEC Urban Background Soil Concentration of 0.58 mg/kg in sample Comp 8,9,10 (3-4.5). Due to the elevated PAH concentration reported in sample Comp 8,9,10 (3-4.5), sub-samples SB-8 (3-4.5), SB-9 (3-4.5), and SB-10 (3-4.5) were taken "off-hold" at the laboratory and analyzed for PAHs. Analytical results for sub-samples SB-8 (3-4.5) and SB-9 (3-4.5) reported PAH concentrations (as expressed by the BaP-TEQ) of 1.63 mg/kg and 20.67 mg/kg, respectively, both exceeding the VTDEC Urban Background Soil Concentration of 0.58 mg/kg. The PAH concentration (as expressed by the BaP-TEQ) in subsample SB-10 (3-4.5) was 0.04 mg/kg, less than the VTDEC Urban Background Soil Concentration of 0.58 mg/kg.

Results of the VOC analysis reported no VOC analytes at concentrations exceeding the respective laboratory reporting limits with the exception of PCE in sample Comp 8,9,10 (3-4.5), which was detected at a concentration of 0.34 mg/kg, less than the residential VSS of 2.4 mg/kg. Due to the known PCE impacts identified at the south end of the Project area (see Section 1.3), VHB with authorization from the City of Barre, instructed the laboratory to take sub-samples SB-8 (3-4.5), SB-9 (3-4.5), and SB-10 (3-4.5) "off-hold" for analysis of PCE, to determine if one or more of the subsamples might contain PCE at a concentration exceeding the residential VSS of 2.4 mg/kg. PCE was not detected at a concentration exceeding the laboratory reporting limit in sub-sample SB-8 (3-4.5) and was detected at a concentration of 0.099 mg/kg in sub-sample SB-10 (3-4.5), less than the residential VSS of 2.4 mg/kg. PCE was detected at a concentration of 2.5 mg/kg in sub-sample SB-9 (3-4.5), slightly exceeding the residential VSS of 2.4 mg/kg.

No metals were detected in either composite sample at concentrations exceeding their applicable soil standards and lead was not detected at concentrations greater than the TCLP Regulatory Level for lead multiplied by 20 (100 mg/kg). No PCBs or herbicides were detected in either composite sample at concentrations exceeding laboratory reporting limits.

No pesticides were reported at concentrations exceeding laboratory reporting limits in sample Comp 5,6,7 (3-4.5).

### **Contingency TCLP and SPLP Analyses**

The Work Plan stated that the two samples with the highest lead concentrations at or above 100 mg/kg, equivalent to the TCLP Regulatory Level for lead multiplied by 20, would be analyzed for lead via TCLP. No lead concentrations in any sample analyzed during this investigation were equivalent to or exceeded 100 mg/kg; therefore, no samples were analyzed for lead via TCLP.

The Work Plan also stated that the two samples with the highest BaP concentrations would be analyzed for BaP via SPLP. In order to meet the laboratory's hold time requirements, the two samples with the highest BaP concentrations were selected from the initial round of analyzed samples. The two samples with the highest BaP concentrations were SB-3 (0-3) and SB-4 (0-3) with respective BaP concentrations of 3.5 mg/kg and 4.1 mg/kg. BaP SPLP results for samples SB-3 (0-3) and SB-4 (0-3) were 4.4 ug/L and 4.2 ug/L, respectively, both exceeding the VGES of 0.2 ug/L.

The analytical results discussed in this section are summarized in **Table 1** through **Table 6**, laboratory analytical reports are presented in **Appendix B**, and soil analytical results are summarized in **Figure 2**.

### **2.3 Investigation Derived Waste**

No investigation derived waste (IDW) was generated during the investigation; therefore, no IDW required management during the soil investigation.

## **3.0 CONCEPTUAL SITE MODEL**

Historical use of Merchant's Row and surrounding properties include many commercial and industrial enterprises such as, granite manufacturers, automotive service stations, dry cleaners, and a manufactured gas plant. It is likely that the railroad corridor adjacent to the west side of the Project area was frequently used to transport materials to and from these enterprises. The Stevens Branch of the Winooski River previously passed through the Project area. After the course of the river changed, the former river channel was filled with soil of unknown quality or origin. The Project area is bound to the east and northeast by North Main Street, to the northwest by Depot Square, to the south by Prospect Street, and to the southwest by a railroad corridor. The Project area is currently used as a parking lot and associated driveways.

Project area soils were typically comprised of brown sand and gravel with trace to some coal, concrete, metal and brick fragments, and trace amounts of ash ranging from 1 fbg to a maximum observed depth of 5 fbg. Deeper soil borings encountered a brown, coarse to fine sand with varying amounts of gravel and silt. Depth to groundwater measurements recorded at the property abutting the Project area to the north ranged from approximately 7 to 8 fbg with a reported groundwater flow direction to the west-southwest toward Stevens Branch (Nobis, 2012).

Information obtained during this investigation and the Nobis 2012 investigation indicate that PAHs are the primary contaminant of concern at the Project area, and are present at select locations (12 out of 33 sample locations) at concentrations exceeding the Vermont Urban Background Concentration (0.58 mg/kg). Based on the results of two BaP SPLP analyses, elevated BaP concentrations in Project area soil could potentially impact groundwater should the soil-bound BaP concentrations mobilize as a result of precipitation infiltration. This is unlikely as the impacted soils are located beneath an impervious pavement surface and at depths shallower than the groundwater table.

The PAH data did not confine the most elevated impacts to a particular depth or location within the Project area with the exception of the "black ash material" located in shallow soil at the north end of the Project area. The presence of PAHs in Project area soils is likely the result of mixed industrial activities that previously occurred in and around the Project area and/or associated with the importation of potentially impacted fill from unknown sources to backfill the former river channel.

PCE was also detected at one sample location near the south end of the Project area at a concentration exceeding the residential VSS, but less than the non-residential VSS. This PCE

detection was not surprising given the proximity of the south end of the Project area to the Bonacorsi & Sons Site (SMS# 20023048).

The primary exposure pathway of these isolated soil impacts to site workers and site users is inhalation, ingestion, or dermal contact; therefore, recommended actions include removal or isolation of the soil impacted with PAHs at concentrations exceeding the Vermont Urban Soil Background Concentration. PCE impacts in soil can off-gas causing a potential vapor intrusion in buildings. However, considering the one low-level detection identified in the southern end of the Project area is likely associated with the known chlorinated solvent plume that is actively being remediated, the risk of vapor intrusion occurring to the extent that indoor air quality would be compromised is low.

Based on analytical results, field readings and observations from all 10 soil borings advanced during this investigation and the 20 soil borings advanced during the 2012 Nobis investigation, there is no evidence of petroleum impacts in soil at the Project area. Furthermore, VOCs (with the exception of one PCE exceedance of the residential VSS, mentioned above) RCRA8 metals, PCBs, pesticides, or herbicides were not detected at concentrations exceeding their respective regulatory standards during this investigation or the 2012 Nobis investigation. Therefore, the primary contaminant concern appears to be limited to PAHs, only.

#### **4.0 QUALITY ASSURANCE / QUALITY CONTROL MEASURES**

Field screening, sample collection and laboratory analysis activities were conducted in accordance with the approved Scope of Services. Quality assurance (QA) and quality control (QC) measures appear to have been satisfactory during the course of the project. All samples adhered to laboratory sample acceptance policies; and, laboratory analytical QA/QC criteria are included with the attached laboratory reports. No data were rejected due to improper collection techniques, sample delivery issues, hold times or laboratory analytical procedures.

##### **4.1 Duplicate Samples**

Due to the heterogeneity of soils and because this soil investigation was for construction pre-characterization purposes only, no duplicate samples were collected.

##### **4.2 Trip Blank / Equipment Blanks**

A total of one Trip Blank was transported to EAI for analysis of VOCs by EPA method 8260C along with the soil samples. No VOC's were detected at concentrations above laboratory reporting limits in the trip blank.

##### **4.3 Elevated Reporting Limits**

Laboratory reporting limits for all analytes were below the respective SSVs for all samples analyzed during this investigation.

#### 4.4 QA/QC Conclusions

Laboratory reporting limits were below the applicable SSVs and all samples adhered to laboratory sample acceptance policies; therefore, the analytical data for the project are deemed useable, accurate and complete for the purposes of this report.

#### 4.5 Data Gaps

The Scope of Services was followed and completed by JCO (currently VHB) with assistance from subcontractor EAI. No data gaps associated with field screening, sample collection, and/or laboratory analysis activities have been identified as of the date of this report.

### 5.0 CONCLUSIONS AND RECOMMENDATIONS

Based on the field observations and analytical results of this soil characterization investigation and the analytical results of the 2012 Nobis investigation, VHB concludes the following:

- No visual, olfactory, or PID screening evidence of petroleum or other VOC impacts to soil were detected in any of the 10 soil borings advanced at the Project area on May 21, 2019. Visual observations of non-petroleum impacts included trace to some amounts of coal, concrete, metal and brick fragments, and trace amounts of ash. Darker colored strata were observed at select locations and were associated with higher concentrations of coal fragments and coal dust.
- Analytical results from both the 2012 Nobis and this 2019 VHB investigation reported no detections of non-PAH SVOCs, metals, PCBs, pesticides, or herbicides at concentrations exceeding their respective regulatory standards.
- Based on the laboratory analytical results for this study and the analytical results from the 2012 Nobis investigation, PAHs are the primary contaminant of concern. PAHs were detected at concentrations greater than the Vermont Urban Background Soil Concentration in 5 out of 9 soil samples collected from the Project area during this investigation and in 7 out of 24 discrete soil samples collected from the Project area during the 2012 Nobis investigation. PAH impacts generally do not appear to be associated with a particular depth or location and appear to be associated with fill that was placed at the Project area based on the anthropogenic debris that was inconsistently observed at various depths and locations. PAH impacts at the north end of the Project area appear to be associated with the "black ash material" that was identified in shallow soil at various depths and thicknesses.
- SPLP analytical results for BaP indicated that elevated BaP concentrations in Project area soil may pose a risk to groundwater. BaP concentrations in groundwater at the Project area are unknown.
- PCE was detected in only one discrete sample during this investigation at a concentration exceeding the residential VSS, but less than the non-residential VSS. No other VOC exceedances of residential or non-residential VSSs or EPA RSLs were identified during this 2019 VHB investigation. Analytical results for VOC analysis of the soil samples collected

during the 2012 Nobis investigation reported no VOC exceedances of residential or non-residential/industrial SSVs.

## **RECOMMENDATIONS**

Soil impacts consist of PAHs at select locations throughout the Project area and PCE at one location near the southeast end of the Project area. The impacted soil is currently isolated under an impervious surface and, therefore, poses no direct contact risk to the public. The elevated BaP concentrations in soil are unlikely to impact groundwater because the impacted soil is located beneath impervious pavement, and, therefore, precipitation infiltrate is unlikely to contact or mobilize the soil-bound BaP. Additionally, the impacted soil is located in the shallow unsaturated zone which does not directly contact groundwater. Confirmatory groundwater sampling for BaP near the location where the SPLP soil samples were collected is recommended to confirm no BaP groundwater impacts exist.

This Soil Characterization Investigation was performed to supplement the 2012 Nobis investigation and to obtain analytical results for soil that is likely to be disturbed during potential redevelopment activities associate with the Project. Supplemental soil sampling is recommended at depths and locations of excavations for the reconstruction or installation of specific features that are proposed as part of the Project (e.g.: utility trenches, catch basins, or significant roadway cuts) to better evaluate the PAH or PCE concentrations in soil that will be disturbed and to determine the potential reuse options for soil that will be disturbed during the Project. If offsite disposal of impacted soil is required due to proposed grade changes or because material is structurally unsuitable for reuse, full characterization of material representative of what may need to be sent to a certified landfill would be required at an interval of one sample for every 200 tons in Vermont or one sample per 500 tons in New York.

Through careful planning it is possible that the material that does not exceed the Vermont Urban Background Concentration for PAHs could be disposed of at a low cost within an "urban background area" as defined by the VT ANR Natural Resources Atlas tool. This approach could generate capacity for material that exceeded the Vermont Urban Background Soil Concentration for PAHs and, therefore, allow it to remain onsite and ultimately be isolated under a VTDEC approved barrier, should it be shown that the elevated BaP concentrations will not impact groundwater.

## **6.0 LIMITATIONS**

This information is intended for the use of the City for the specific purpose of documenting Site contamination at the site of the Merchants Row Redevelopment Project, in Barre, Vermont. No other uses, expressed or implied, are warranted. The design of the investigation was based on sound scientific techniques and experience with similar investigations. However, the conclusions of this assessment are based on limited information. Should additional information become available pertaining to environmental concerns, VHB reserves the right to re-evaluate conclusions made herein.

The conclusions of this report were derived from information provided to VHB from the following sources: The City; EAI; Nobis; and Stone Environmental, Inc. Independent verification of the work performed by others was not always possible; therefore, its accuracy and reliability cannot be warranted.

This Report was prepared pursuant to Agreements between VHB and the City. All uses of this Report are subject to the conditions and restrictions contained in the Agreements. The observations and investigations described in this Report are based solely on the Scope of Services provided pursuant to the Agreement. VHB shall not be liable for the existence of any condition the discovery of which would have required the performance of services not authorized under the Agreement. This work has been undertaken in accordance with generally accepted consulting practices. No other warranty, expressed or implied, is made.

This Report reflects Site conditions observed during the last Site visit and described by records available to VHB as of the date of the field investigation. The passage of time may result in significant changes in Site conditions, technology, or economic conditions, which could alter the findings and/or recommendations of the Report. Accordingly, the Client (The City of Barre) and any other party to whom the Report is provided recognize and agree that VHB shall bear no liability for deviations due to observed conditions after the last Site visit or records available after the time of Report preparation.

## **7.0 REFERENCES**

Nobis, 2012. Nobis Engineering, Inc. Targeted Brownfields Assessment Phase II Investigation, Merchants Row, dated December 2012.

Stone, 2011. Stone Environmental, Inc. Area Wide Assessment, Merchants Row Redevelopment Project, dated September 30, 2011.

## **TABLES**

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**The following acronyms are applicable to the text and/or tables**

**Acronyms**

|       |   |   |
|-------|---|---|
| ---   | = | Value Not Available or Not Calculated   |
| BaP   | = | Benzo(a)pyrene  |
| DRO   | = | Diesel Range Organics   |
| DUP   | = | Duplicate   |
| EAI   | = | Eastern Analytical of Manchester, New Hampshire                                       |
| GRO   | = | Gasoline Range Organics   |
| Ind   | = | Industrial Screening Standard   |
| IRULE | = | VTDEC Investigation and Remediation of Contaminated Properties Rule, July 6, 2019     |
| MW    | = | Monitoring Well   |
| PCB   | = | Polychlorinated Biphenyl  |
| PAH   | = | Polycyclic Aromatic Hydrocarbon   |
| PID   | = | Photoionization Detector  |
| Res   | = | Residential Screening Standard  |
| RPD   | = | Relative Percent Difference (not calculated where one or both results are non-detect) |
| RSL   | = | USEPA Regional Screening Level, May 2019  |
| SB    | = | Soil Boring   |
| SIM   | = | Selective Ion Monitoring  |
| SSV   | = | Soil Screening Value  |
| VSS   | = | Vermont Soil Standard from the IRULE. If available, VSS trumps residential RSL        |
| SU    | = | Standard Unit   |
| SVOC  | = | Semi-Volatile Organic Compound  |
| TCLP  | = | Toxicity Characteristic Leaching Procedure  |
| TEF   | = | Toxicity Equivalence Factors, World Health Organization, 2005                         |
| TEQ   | = | Toxicity Equivalency (calculated from toxicity equivalence factors)                   |
| TPH   | = | Total Petroleum Hydrocarbon   |
| USEPA | = | United States Environmental Protection Agency   |
| VDH   | = | Vermont Department of Health  |
| VGES  | = | Vermont Groundwater Enforcement Standard  |
| VOC   | = | Volatile Organic Compound   |
| Comp  | = | Composite Sample  |
| NA    | = | Not Analyzed  |
| Urb   | = | Urban   |

**Cell & Text Shading**

|                            | <b>Regulatory Standards</b>   | <b>Regulatory Standards (applies to BaP TEQ only)</b>   |
|----------------------------|---|---|
| <b>Black w/ White Text</b> | = Analytical Value exceeds:<br>a) Non-Residential VSS, or<br>b) Industrial RSL<br>c) VTDEC Background Soil Concentration, or<br>d) VGES | <b>Orange w/ White Text</b> = Analytical Value Exceeds VTDEC Urban Background Soil Concentration (0.58 mg/kg).  |
| <b>Gray w/ Black Text</b>  | = Analytical Value exceeds:<br>a) Residential VSS, or<br>b) RSL (when applicable)   | <b>Yellow w/ Black Text</b> = Analytical Value Exceeds Residential VSS (0.07 mg/kg), but is Less than the VTDEC Urban Background Soil Concentration (0.58 mg/kg). |
| Regular Text               | = Analytical Value is less than:<br>a) Residential VSS, or<br>b) RSL (when applicable)  | <b>Green w/ Black Text</b> = Analytical Value is less than Residential VSS (0.07 mg/kg).  |
| Grey Text                  | = Analytical Result: value is non-detect  |   |

**Data Results and Qualifiers**

< = not detected, value given is the laboratory reporting limit

**Units**

|                        |   |                                       |
|------------------------|---|---------------------------------------|
| fbgs                   | = | feet below ground surface             |
| ft                     | = | feet                                  |
| mg/kg                  | = | milligrams per kilogram               |
| µg/L                   | = | micrograms per liter                  |
| mg/L                   | = | milligrams per liter                  |
| µg/100 cm <sup>2</sup> | = | micrograms per 100 square centimeters |

Table 1 - Soil VOC Analytical Results  
 Merchants Row Redevelopment Project, Barre, Vermont

| Location within Project Area: |                 |         |       | South End  |             |              | QA/QC    |          |            |
|-------------------------------|-----------------|---------|-------|------------|-------------|--------------|----------|----------|------------|
| Sample ID:                    |                 |         |       | Comp 5,6,7 | Comp 8,9,10 | SB-8         | SB-9     | SB-10    | Trip Blank |
| Sample Depth (ft):            |                 |         |       | 3-4.5      | 3-4.5       | 3-4.5        | 3-4.5    | 3-4.5    |            |
| Sample Date:                  |                 |         |       | 05/21/19   | 05/21/19    | 05/21/19     | 05/21/19 | 05/21/19 | 05/21/19   |
| Analyte                       | Screening Level |         | Units |            |             |              |          |          |            |
|                               | Non-Res.        | Res.    |       |            |             |              |          |          |            |
| 1,2,4-Trimethylbenzene        | --              | --      | mg/kg | < 0.05     | < 0.05      | Not Analyzed |          |          | < 0.05     |
| 1,3,5-Trimethylbenzene        | --              | --      | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| <i>Total Trimethylbenzene</i> | 177             | 144     | mg/kg | ---        | ---         |              |          |          | ---        |
| 1,2-Dibromoethane(EDB)        | 0.14            | 0.02    | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| 2-Butanone(MEK)               | 26991           | 16952   | mg/kg | < 0.5      | < 0.5       |              |          |          | < 0.5      |
| 2-Hexanone                    | 1300*           | 200*    | mg/kg | < 0.1      | < 0.1       |              |          |          | < 0.1      |
| 4-Methyl-2-pentanone(MIBK)    | 140000*         | 33000*  | mg/kg | < 0.5      | < 0.5       |              |          |          | < 0.5      |
| Acetone                       | 100028          | 40609   | mg/kg | < 2        | < 2         |              |          |          | < 2        |
| Benzene                       | 4.2             | 0.7     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Bromobenzene                  | 1800*           | 290*    | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Bromoform                     | 86*             | 19*     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Bromomethane                  | 30*             | 6.8*    | mg/kg | < 0.2      | < 0.2       |              |          |          | < 0.2      |
| Carbon disulfide              | 662             | 608     | mg/kg | < 0.1      | < 0.1       |              |          |          | < 0.1      |
| Dibromomethane                | 99*             | 24*     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Diethyl Ether                 | 230000*         | 16000*  | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Ethylbenzene                  | 22              | 3.7     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| IsoPropylbenzene              | 264             | 256     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Methyl-t-butyl ether(MTBE)    | 4464            | 649     | mg/kg | < 0.1      | < 0.1       |              |          |          | < 0.1      |
| mp-Xylene                     | 257             | 252     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Naphthalene                   | 16              | 2.7     | mg/kg | < 0.1      | < 0.1       |              |          |          | < 0.1      |
| n-Butylbenzene                | 51100           | 3504    | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| n-Propylbenzene               | 261             | 253     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| o-Xylene                      | 2800*           | 650*    | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| p-Isopropyltoluene            | --              | --      | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| sec-Butylbenzene              | 102200          | 7009    | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Styrene                       | 35000*          | 6000*   | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| tert-Butylbenzene             | 120000*         | 7800*   | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| Tetrahydrofuran(THF)          | 94000*          | 18000*  | mg/kg | < 0.5      | < 0.5       |              |          |          | < 0.5      |
| Toluene                       | 798             | 706     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| 1,1,1,2-Tetrachloroethane     | 8               | 1.3     | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| 1,1,1-Trichloroethane         | 36000*          | 8100*   | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| 1,1,2,2-Tetrachloroethane     | 2.7*            | 0.6*    | mg/kg | < 0.05     | < 0.05      |              |          |          | < 0.05     |
| 1,1,2-Trichloroethane         | 5*              | 1.1*    | mg/kg | < 0.05     | < 0.05      |              |          | < 0.05   |            |
| 1,1-Dichloroethane            | 13              | 2.1     | mg/kg | < 0.05     | < 0.05      |              |          | < 0.05   |            |
| 1,1-Dichloroethene            | 1000*           | 230*    | mg/kg | < 0.05     | < 0.05      |              |          | < 0.05   |            |
| 1,1-Dichloropropene           | --              | --      | mg/kg | < 0.05     | < 0.05      |              |          | < 0.05   |            |
| 1,2,3-Trichlorobenzene        | 930*            | 63*     | mg/kg | < 0.05     | < 0.05      |              |          | < 0.05   |            |
| 1,2,3-Trichloropropane        | 0.07            | 0.00311 | mg/kg | < 0.05     | < 0.05      |              |          | < 0.05   |            |
| 1,2,4-Trichlorobenzene        | 110*            | 24*     | mg/kg | < 0.05     | < 0.05      |              |          | < 0.05   |            |

Table 1 - Soil VOC Analytical Results  
 Merchants Row Redevelopment Project, Barre, Vermont

| Analyte                     | Screening Level                                  |         | Units | Comp 5,6,7<br>3-4.5<br>05/21/19 | Comp 8,9,10<br>3-4.5<br>05/21/19 | SB-8<br>3-4.5<br>05/21/19 | SB-9<br>3-4.5<br>05/21/19 | SB-10<br>3-4.5<br>05/21/19 | Trip Blank<br>05/21/19 |
|-----------------------------|--|---------|-------|---------------------------------|----------------------------------|---------------------------|---------------------------|----------------------------|------------------------|
|                             | Non-Res.   | Res.    |       |                                 |                                  |                           |                           |                            |                        |
|                             | Sample ID:<br>Sample Depth (ft):<br>Sample Date: |         |       |                                 |                                  |                           |                           |                            |                        |
| 1,2-Dibromo-3-chloropropane | 0.064*   | 0.0053* | mg/kg | < 0.05                          | < 0.05                           | Not Analyzed              |                           |                            | < 0.05                 |
| 1,2-Dichlorobenzene         | 9300*  | 1800*   | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| 1,2-Dichloroethane          | 1.7  | 0.29    | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| 1,2-Dichloropropane         | 9.1  | 1.5     | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| 1,3-Dichlorobenzene         | --   | --      | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| 1,3-Dichloropropane         | 23000*   | 1600*   | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| 1,4-Dichlorobenzene         | 11*  | 2.6*    | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| 2,2-Dichloropropane         | --   | --      | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| 2-Chlorotoluene             | 23000*   | 1600*   | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| 4-Chlorotoluene             | 23000*   | 1600*   | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Bromochloromethane          | 597  | 193     | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Bromodichloromethane        | 1.3*   | 0.29*   | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Carbon tetrachloride        | 2.2  | 0.37    | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Chlorobenzene               | 726  | 414     | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Chloroethane                | 57000*   | 14000*  | mg/kg | < 0.1                           | < 0.1                            |                           | < 0.1                     |                            |                        |
| Chloroform                  | 1.4*   | 0.32*   | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Chloromethane               | 460*   | 110*    | mg/kg | < 0.1                           | < 0.1                            |                           | < 0.1                     |                            |                        |
| cis-1,2-Dichloroethene      | 1814   | 140     | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| cis-1,3-Dichloropropene     | --   | --      | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Dibromochloromethane        | 39*  | 8.3*    | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Dichlorodifluoromethane     | 370*   | 87*     | mg/kg | < 0.1                           | < 0.1                            | < 0.1                     |                           |                            |                        |
| Hexachlorobutadiene         | 5.3*   | 1.2*    | mg/kg | < 0.05                          | < 0.05                           | < 0.05                    |                           |                            |                        |
| Methylene chloride          | 1000*  | 57*     | mg/kg | < 0.1                           | < 0.1                            | < 0.1                     |                           |                            |                        |
| Tetrachloroethene           | 14   | 2.4     | mg/kg | < 0.05                          | 0.34                             | <0.05                     | <b>2.5</b>                | 0.099                      | < 0.05                 |
| trans-1,2-Dichloroethene    | 18137  | 1402    | mg/kg | < 0.05                          | < 0.05                           | Not Analyzed              |                           |                            | < 0.05                 |
| trans-1,3-Dichloropropene   | --   | --      | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Trichloroethene             | 6*   | 0.94*   | mg/kg | < 0.05                          | < 0.05                           |                           | < 0.05                    |                            |                        |
| Trichlorofluoromethane      | 350000*  | 23000*  | mg/kg | < 0.1                           | < 0.1                            |                           | < 0.1                     |                            |                        |
| Vinyl chloride              | 1.7*   | 0.059*  | mg/kg | < 0.1                           | < 0.1                            | < 0.1                     |                           |                            |                        |

\* Indicates no VSS is listed in IRule, applicable industrial or residential RSL is used

Table 2 - Soil SVOC Analytical Results  
 Merchants Row Redevelopment Project, Barre, Vermont

| Location within Project Area: |                 |          |            |       | North End    |          |          | Center   |          | South End  |             |          |          |          |
|-------------------------------|-----------------|----------|------------|-------|--------------|----------|----------|----------|----------|------------|-------------|----------|----------|----------|
| Sample ID:                    |                 |          |            |       | SB-1         | SB-1     | SB-2     | SB-3     | SB-4     | Comp 5,6,7 | Comp 8,9,10 | SB-8     | SB-9     | SB-10    |
| Sample Depth (ft):            |                 |          |            |       | 0.5-1.5      | 2.2-3    | 1-1.5    | 0-3      | 0-3      | 3-4.5      | 3-4.5       | 3-4.5    | 3-4.5    | 3-4.5    |
| Sample Date:                  |                 |          |            |       | 05/21/19     | 05/21/19 | 05/21/19 | 05/21/19 | 05/21/19 | 05/21/19   | 05/21/19    | 05/21/19 | 05/21/19 | 05/21/19 |
| Analyte                       | Screening Level |          | BaP<br>TEF | Units |              |          |          |          |          |            |             |          |          |          |
|                               | Non-Res.        | Res.     |            |       |              |          |          |          |          |            |             |          |          |          |
| 1,2,4-Trichlorobenzene        | 110*            | 24*      | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 1,2-Dichlorobenzene           | 9300*           | 1800*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 1,3-Dichlorobenzene           | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 1,4-Dichlorobenzene           | 11*             | 2.6*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2,3-Dichloroaniline           | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2,4,5-Trichlorophenol         | 82000*          | 6300*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2,4,6-Trichlorophenol         | 210*            | 49*      | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2,4-Dichlorophenol            | 2500*           | 190*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2,4-Dimethylphenol            | 16000*          | 1300*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2,4-Dinitrophenol             | 1600*           | 130*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2,4-Dinitrotoluene            | 7.4*            | 1.7*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2,6-Dinitrotoluene            | 1.5*            | 0.36*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2-Chloronaphthalene           | 60000*          | 4800*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2-Chlorophenol                | 5800*           | 390*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2-Methylphenol                | 41000*          | 3200*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2-Nitroaniline                | 8000*           | 630*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 2-Nitrophenol                 | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 3,3'-Dichlorobenzidine        | 5.1*            | 1.2*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 3/4-Methylphenol              | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 3-Nitroaniline                | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 4,6-Dinitro-2-methylphenol    | 66*             | 5.1*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 4-Bromophenyl-phenylether     | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 4-Chloro-3-methylphenol       | 82000*          | 6300*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 4-Chloroaniline               | 11*             | 2.7*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 4-Chlorophenyl-phenylether    | --              | --       | --         | mg/kg | Not Analyzed |          |          |          |          |            |             |          |          |          |
| 4-Nitroaniline                | 110*            | 27*      | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| 4-Nitrophenol                 | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Acetophenone                  | 120000*         | 7800*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| alpha-Terpineol               | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Aniline                       | 400*            | 95*      | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Azobenzene                    | 26*             | 5.6*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Benzidine (estimated)         | 0.01*           | 0.00053* | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Benzoic Acid                  | 3300000*        | 250000*  | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Benzyl alcohol                | 82000*          | 6300*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| bis(2-Chloroethoxy)methane    | 2500*           | 190*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| bis(2-Chloroethyl)ether       | 1*              | 0.23*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| bis(2-chloroisopropyl)ether   | 36274           | 2804     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| bis(2-Ethylhexyl)phthalate    | 120             | 20       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Butylbenzylphthalate          | 1200*           | 290*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Carbazole                     | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Dibenzofuran                  | 1000*           | 73*      | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Diethylphthalate              | 660000*         | 51000*   | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Dimethylphthalate             | --              | --       | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Di-n-butylphthalate           | 82000*          | 6300*    | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Di-n-octylphthalate           | 8200*           | 630*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Hexachlorobenzene             | 0.69            | 0.13     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Hexachlorobutadiene           | 5.3*            | 1.2*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |
| Hexachlorocyclopentadiene     | 7.5*            | 1.8*     | --         | mg/kg |              |          |          |          |          |            |             |          |          |          |

Table 2 - Soil SVOC Analytical Results  
 Merchants Row Redevelopment Project, Barre, Vermont

| Sample ID:<br>Sample Depth (ft):<br>Sample Date: |                 |        |            |       | SB-1<br>0.5-1.5<br>05/21/19 | SB-1<br>2.2-3<br>05/21/19 | SB-2<br>1-1.5<br>05/21/19 | SB-3<br>0-3<br>05/21/19 | SB-4<br>0-3<br>05/21/19 | Comp 5,6,7<br>3-4.5<br>05/21/19 | Comp 8,9,10<br>3-4.5<br>05/21/19 | SB-8<br>3-4.5<br>05/21/19 | SB-9<br>3-4.5<br>05/21/19 | SB-10<br>3-4.5<br>05/21/19 |              |  |  |  |  |  |  |  |  |  |
|--|-----------------|--------|------------|-------|-----------------------------|---------------------------|---------------------------|-------------------------|-------------------------|---------------------------------|----------------------------------|---------------------------|---------------------------|----------------------------|--------------|--|--|--|--|--|--|--|--|--|
| Analyte  | Screening Level |        | BaP<br>TEF | Units | Not Analyzed                |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
|  | Non-Res.        | Res.   |            |       |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| Hexachloroethane                                 | 8*              | 1.8*   | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            | Not Analyzed |  |  |  |  |  |  |  |  |  |
| Isophorone                                       | 2400*           | 570*   | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| n-Decane   | --              | --     | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| Nitrobenzene                                     | 22*             | 5.1*   | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| N-Nitrosodimethylamine                           | 0.034*          | 0.002* | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| n-Nitroso-di-n-propylamine                       | 0.33*           | 0.078* | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| n-Nitrosodiphenylamine                           | 470*            | 110*   | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| n-Octadecane                                     | --              | --     | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| Pentachlorophenol                                | 2.9             | 0.48   | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| Phenol   | 250000*         | 19000* | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |
| Pyridine   | 1200*           | 78*    | --         | mg/kg |                             |                           |                           |                         |                         |                                 |                                  |                           |                           |                            |              |  |  |  |  |  |  |  |  |  |

**Polycyclic Aromatic Hydrocarbons (PAHs)**

|                      |         |        |    |       |       |         |         |        |       |         |       |       |      |         |
|----------------------|---------|--------|----|-------|-------|---------|---------|--------|-------|---------|-------|-------|------|---------|
| 1-Methylnaphthalene  | 73*     | 18*    | -- | mg/kg | 0.097 | < 0.008 | < 0.008 | 0.042  | 0.086 | < 0.007 | 0.075 | 0.069 | 0.3  | < 0.007 |
| 2-Methylnaphthalene  | 3000*   | 240*   | -- | mg/kg | 0.085 | < 0.008 | < 0.008 | 0.083  | 0.13  | < 0.007 | 0.067 | 0.072 | 0.25 | < 0.007 |
| Acenaphthene         | 45000*  | 3600*  | -- | mg/kg | 0.083 | < 0.008 | < 0.008 | < 0.04 | 0.048 | 0.0078  | 0.072 | 0.036 | 0.43 | < 0.007 |
| Acenaphthylene       | --      | --     | -- | mg/kg | 0.32  | 0.031   | < 0.008 | 1.8    | 2     | 0.051   | 0.5   | 0.53  | 1.7  | 0.024   |
| Anthracene           | 230000* | 18000* | -- | mg/kg | 0.33  | 0.032   | < 0.008 | 0.61   | 0.86  | 0.038   | 0.56  | 0.28  | 3.6  | 0.0074  |
| Benzo[g,h,i]perylene | --      | --     | -- | mg/kg | 0.9   | 0.18    | < 0.008 | 1.5    | 1.4   | 0.12    | 0.53  | 0.66  | 10   | 0.01    |
| Fluoranthene         | 26371   | 2301   | -- | mg/kg | 2.4   | 0.49    | < 0.008 | 4.2    | 6     | 0.28    | 4.1   | 1.9   | 33   | 0.048   |
| Fluorene             | 26371   | 2301   | -- | mg/kg | 0.099 | 0.018   | < 0.008 | 0.17   | 0.18  | 0.011   | 0.21  | 0.19  | 1.1  | < 0.007 |
| Naphthalene          | 16      | 2.7    | -- | mg/kg | 0.09  | 0.024   | < 0.008 | 0.11   | 0.17  | < 0.007 | 0.11  | 0.072 | 0.53 | < 0.007 |
| Phenanthrene         | --      | --     | -- | mg/kg | 1.3   | 0.32    | < 0.008 | 0.91   | 1.2   | 0.11    | 2.6   | 1     | 20   | 0.028   |
| Pyrene               | 23000*  | 1800*  | -- | mg/kg | 2.4   | 0.47    | < 0.008 | 4.7    | 5.9   | 0.32    | 4     | 1.9   | 33   | 0.049   |

**PAH-Benzo(a)pyrene Toxicity Equivalency (BaP-TEQ)**

|                        |       |       |       |       |             |             |         |             |             |             |             |            |            |         |
|------------------------|-------|-------|-------|-------|-------------|-------------|---------|-------------|-------------|-------------|-------------|------------|------------|---------|
| Benzo[a]anthracene     | 21*   | 1.1*  | 0.1   | mg/kg | <b>1.4</b>  | 0.2         | < 0.008 | <b>3.1</b>  | <b>4</b>    | 0.17        | <b>2.2</b>  | <b>1.1</b> | <b>15</b>  | 0.039   |
| Benzo[a]pyrene         | 1.54  | 0.07  | 1     | mg/kg | <b>1.4</b>  | <b>0.22</b> | < 0.008 | <b>3.5</b>  | <b>4.1</b>  | <b>0.18</b> | <b>2.2</b>  | <b>1.1</b> | <b>14</b>  | 0.029   |
| Benzo[b]fluoranthene   | 21*   | 1.1*  | 0.1   | mg/kg | <b>1.9</b>  | 0.28        | < 0.008 | <b>4.7</b>  | <b>6.1</b>  | 0.21        | <b>3</b>    | <b>1.4</b> | <b>17</b>  | 0.039   |
| Benzo[k]fluoranthene   | 210*  | 11*   | 0.01  | mg/kg | 0.64        | 0.11        | < 0.008 | 1.4         | 2.2         | 0.076       | 1.1         | 0.47       | 5.6        | 0.013   |
| Chrysene               | 2100* | 110*  | 0.001 | mg/kg | 1.8         | 0.26        | < 0.008 | 3.5         | 4.3         | 0.19        | 2.6         | 1.2        | 18         | 0.042   |
| Dibenz[a,h]anthracene  | 2.1*  | 0.11* | 1     | mg/kg | <b>0.28</b> | 0.037       | < 0.008 | <b>0.43</b> | <b>0.42</b> | 0.029       | <b>0.17</b> | <b>0.2</b> | <b>2.3</b> | < 0.007 |
| Indeno[1,2,3-cd]pyrene | 21*   | 1.1*  | 0.1   | mg/kg | <b>1.1</b>  | 0.19        | < 0.008 | <b>1.7</b>  | <b>1.6</b>  | 0.13        | 0.73        | 0.75       | <b>11</b>  | 0.013   |

\* Indicates no VSS is listed in IRule, applicable industrial or residential RSL is used

| Analyte | Screening Level |      |            | Units |             |             |             |             |             |             |             |             |             |             |
|---------|-----------------|------|------------|-------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|-------------|
|         | Non-Res.        | Res. | Urb. Bkrnd |       |             |             |             |             |             |             |             |             |             |             |
| BaP TEQ | 1.54            | 0.07 | 0.58       | mg/kg | <b>2.13</b> | <b>0.33</b> | <b>0.01</b> | <b>4.90</b> | <b>5.72</b> | <b>0.26</b> | <b>2.98</b> | <b>1.63</b> | <b>20.7</b> | <b>0.04</b> |

**Synthetic Precipitation Leaching Procedure (SPLP)**

| Analyte               | Screening Level |  |  | Units |              |  |  |            |            |              |  |  |  |  |
|-----------------------|-----------------|--|--|-------|--------------|--|--|------------|------------|--------------|--|--|--|--|
|                       | VGES            |  |  |       |              |  |  |            |            |              |  |  |  |  |
| Benzo[a]pyrene (SPLP) | 0.2             |  |  | ug/L  | Not Analyzed |  |  | <b>4.4</b> | <b>4.2</b> | Not Analyzed |  |  |  |  |

Table 3 - Soil Metals Analytical Results  
 Merchants Row Redevelopment Project, Barre, Vermont

| Location within Project Area: |                 |       |       | Center       |          | South End  |             |
|-------------------------------|-----------------|-------|-------|--------------|----------|------------|-------------|
| Sample ID:                    |                 |       |       | SB-3         | SB-4     | Comp 5,6,7 | Comp 8,9,10 |
| Sample Depth (ft):            |                 |       |       | 0-3          | 0-3      | 3-4.5      | 3-4.5       |
| Sample Date:                  |                 |       |       | 05/21/19     | 05/21/19 | 05/21/19   | 05/21/19    |
| Analyte                       | Screening Level |       | Units |              |          |            |             |
|                               | Non-Res.        | Res.  |       |              |          |            |             |
| Arsenic                       | 16              | 16    | mg/kg | Not Analyzed |          | 6.1        | 5.6         |
| Barium                        | 127382          | 11247 | mg/kg |              |          | 17         | 29          |
| Cadmium                       | 87              | 6.9   | mg/kg |              |          | < 0.5      | < 0.5       |
| Chromium                      | --              | --    | mg/kg |              |          | 16         | 17          |
| Lead                          | 800             | 400   | mg/kg | 8.2          | 26       | 9.4        | 16          |
| Mercury                       | 3.1             | 3.1   | mg/kg | Not Analyzed |          | < 0.1      | < 0.1       |
| Selenium                      | 4900            | 366   | mg/kg |              |          | < 0.5      | < 0.5       |
| Silver                        | 2483            | 237   | mg/kg |              |          | < 0.5      | < 0.5       |

Table 4 - Soil PCB Analytical Results  
 Merchants Row Redevelopment Project, Barre, Vermont

| Location within Project Area: |                 |       |       | South End  |             |
|-------------------------------|-----------------|-------|-------|------------|-------------|
| Sample ID:                    |                 |       |       | Comp 5,6,7 | Comp 8,9,10 |
| Sample Depth (ft):            |                 |       |       | 3-4.5      | 3-4.5       |
| Sample Date:                  |                 |       |       | 05/21/19   | 05/21/19    |
| Analyte                       | Screening Level |       | Units |            |             |
|                               | Ind             | Res   |       |            |             |
| PCB-1016                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| PCB-1221                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| PCB-1232                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| PCB-1242                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| PCB-1248                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| PCB-1254                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| PCB-1260                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| PCB-1262                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| PCB-1268                      | --              | --    | mg/kg | < 0.02     | < 0.02      |
| Total PCBs                    | 0.68            | 0.114 | mg/kg | ---        | ---         |

Table 5 - Soil Pesticides Analytical Results  
 Merchants Row Redevelopment Project, Barre, Vermont

| Location within Project Area: |                 |        |       | North End | South End  |
|-------------------------------|-----------------|--------|-------|-----------|------------|
| Sample ID:                    |                 |        |       | SB-2      | Comp 5,6,7 |
| Sample Depth (ft):            |                 |        |       | 1-1.5     | 3-4.5      |
| Sample Date:                  |                 |        |       | 05/21/19  | 05/21/19   |
| Analyte                       | Screening Level |        | Units |           |            |
|                               | Non-Res.        | Res.   |       |           |            |
| 4,4'-DDD                      | 9.6*            | 1.9*   | mg/kg | < 0.006   | < 0.005    |
| 4,4'-DDE                      | 9.3*            | 2*     | mg/kg | < 0.006   | < 0.005    |
| 4,4'-DDT                      | 8.5*            | 1.9*   | mg/kg | < 0.006   | < 0.005    |
| aldrin                        | 0.1             | 0.02   | mg/kg | < 0.006   | < 0.005    |
| alpha bhc                     | 0.36*           | 0.086* | mg/kg | < 0.006   | < 0.005    |
| beta bhc                      | 1.3*            | 0.3*   | mg/kg | < 0.006   | < 0.005    |
| delta bhc                     | --              | --     | mg/kg | < 0.006   | < 0.005    |
| gamma bhc                     | 2.5*            | 0.57*  | mg/kg | < 0.006   | < 0.005    |
| chlordane                     | --              | --     | mg/kg | < 0.02    | < 0.02     |
| dieldrin                      | 0.14*           | 0.034* | mg/kg | < 0.006   | < 0.005    |
| endosulfan i                  | --              | --     | mg/kg | < 0.006   | < 0.005    |
| endosulfan ii                 | --              | --     | mg/kg | < 0.006   | < 0.005    |
| endosulfan sulfate            | 4900*           | 380*   | mg/kg | < 0.006   | < 0.005    |
| endrin                        | 250*            | 19*    | mg/kg | < 0.006   | < 0.005    |
| endrin aldehyde               | --              | --     | mg/kg | < 0.006   | < 0.005    |
| endrin ketone                 | --              | --     | mg/kg | < 0.006   | < 0.005    |
| heptachlor                    | 0.63*           | 0.13*  | mg/kg | < 0.006   | < 0.005    |
| heptachlor epoxide            | 0.33*           | 0.07*  | mg/kg | < 0.006   | < 0.005    |
| methoxychlor                  | 4100*           | 320*   | mg/kg | < 0.006   | < 0.005    |
| toxaphene                     | 2.1*            | 0.49*  | mg/kg | < 0.06    | < 0.05     |

\* Indicates no VSS is listed in IRule, applicable industrial or residential RSL is used

Table 6 - Soil Herbicides Analytical Results  
 Merchants Row Redevelopment Project, Barre, Vermont

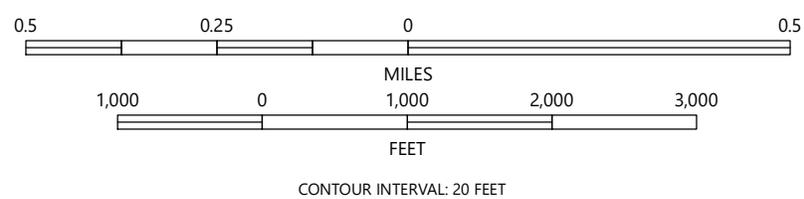
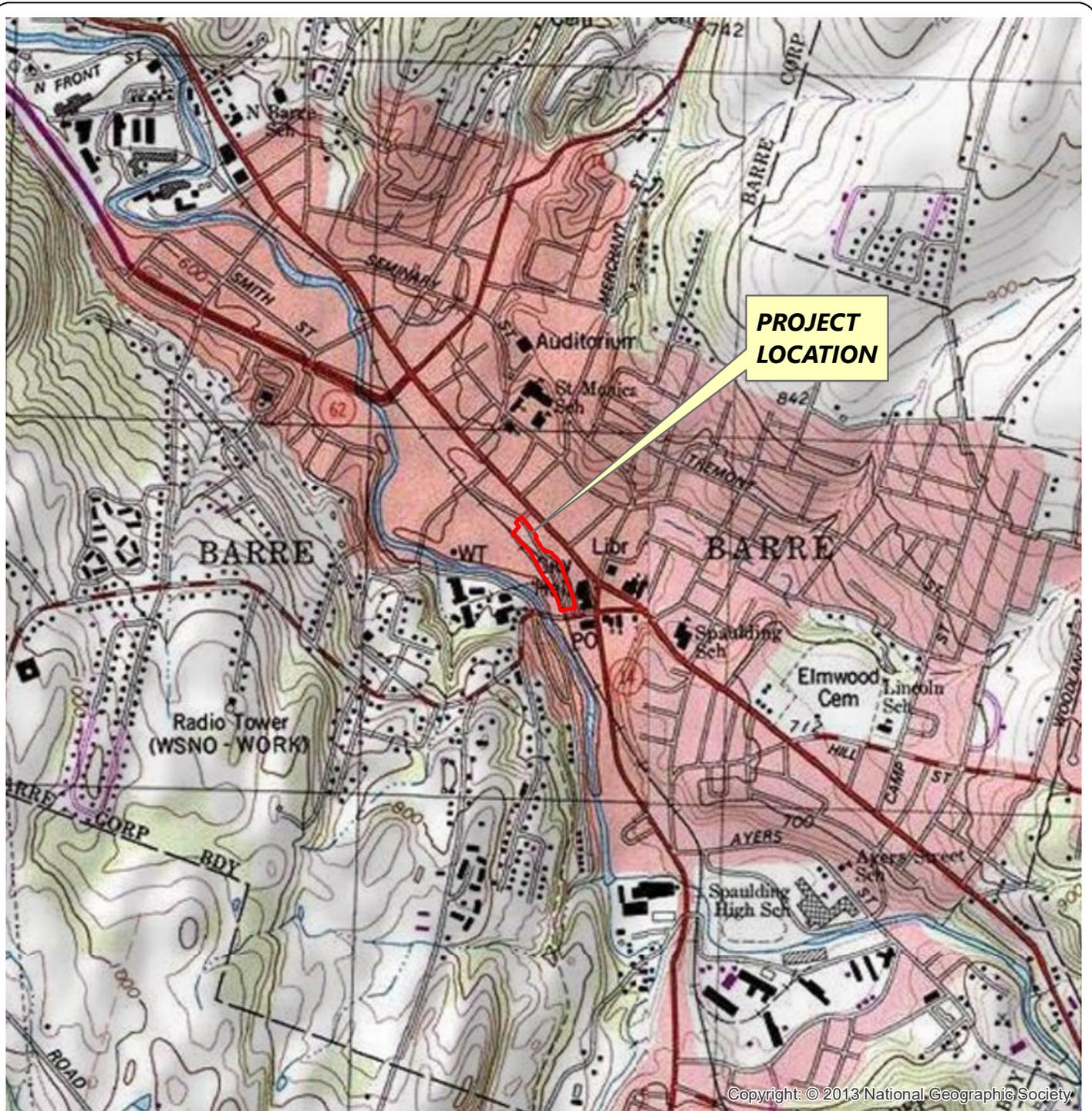
| Location within Project Area: |                 |       |       | South End  |             |
|-------------------------------|-----------------|-------|-------|------------|-------------|
| Sample ID:                    |                 |       |       | Comp 5,6,7 | Comp 8,9,10 |
| Sample Depth (ft):            |                 |       |       | 3-4.5      | 3-4.5       |
| Sample Date:                  |                 |       |       | 05/21/19   | 05/21/19    |
| Analyte                       | Screening Level |       | Units |            |             |
|                               | Ind             | Res   |       |            |             |
| 2,4,5-T                       | 8200*           | 630*  | mg/kg | < 0.089    | < 0.094     |
| 2,4,5-TP (silvex)             | 6600*           | 510*  | mg/kg | < 0.089    | < 0.094     |
| 2,4-D                         | 9600*           | 700*  | mg/kg | < 0.18     | < 0.19      |
| 2,4-DB                        | 25000*          | 1900* | mg/kg | < 0.89     | < 0.94      |
| dalapon                       | 25000*          | 1900* | mg/kg | < 0.089    | < 0.094     |
| dicamba                       | 25000*          | 1900* | mg/kg | < 0.089    | < 0.094     |
| dichloroprop                  | --              | --    | mg/kg | < 0.13     | < 0.14      |
| dinoseb                       | 820*            | 63*   | mg/kg | < 0.089    | < 0.094     |
| MCPA                          | 410*            | 32*   | mg/kg | < 27       | < 28        |
| MCPP                          | 820*            | 63*   | mg/kg | < 27       | < 28        |

\* Indicates no VSS is listed in IRule, applicable industrial or residential RSL is used

## **FIGURES**

**FIGURE 1    SITE LOCATION MAP**

**FIGURE 2    SUMMARY OF 2012 NOBIS AND 2019 VHB SOIL ANALYTICAL RESULTS**

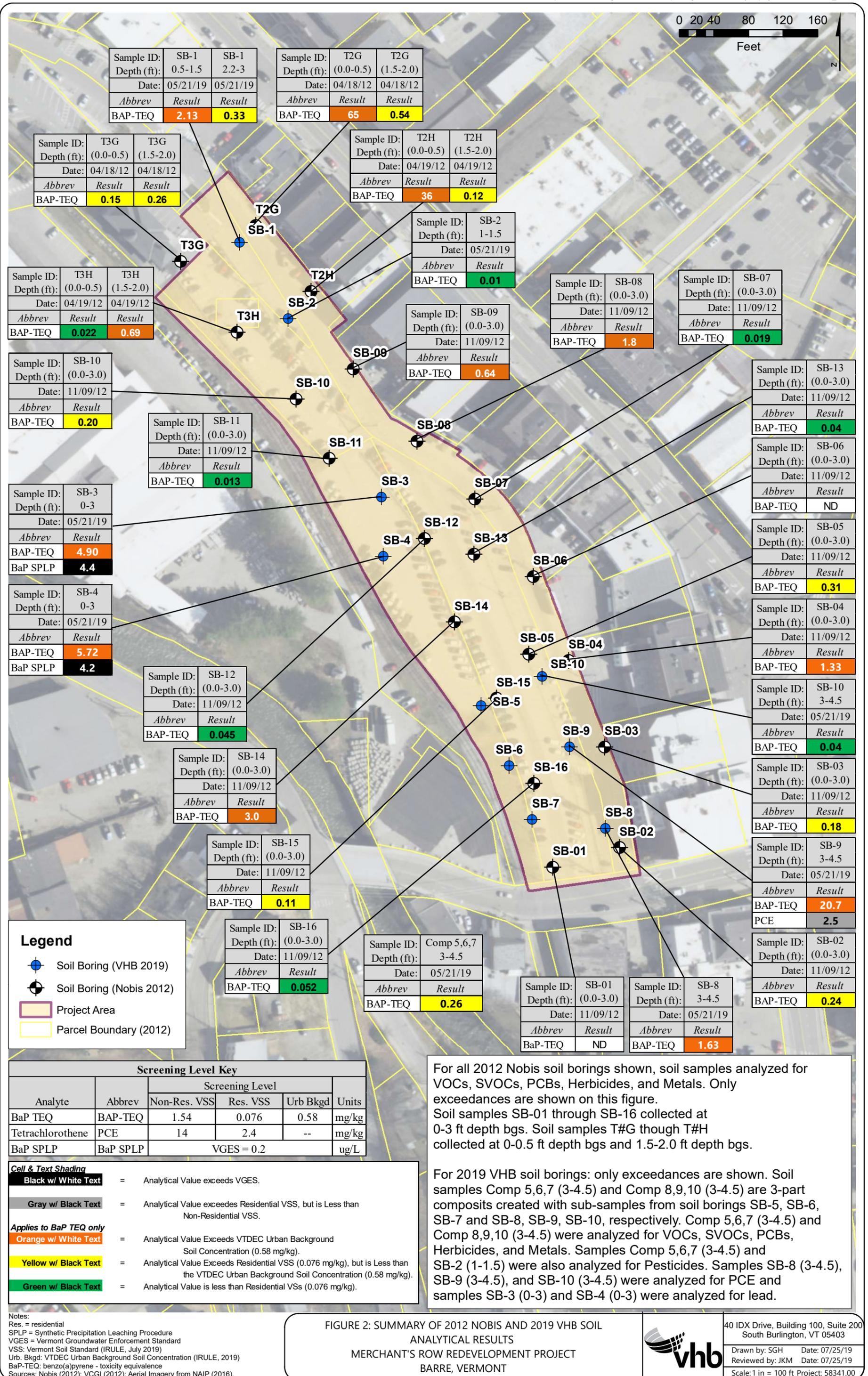


BASE MAP: USGS Seamless iTopo 1:24,000, December 12, 2009

**FIGURE 1: PROJECT LOCATION MAP**  
**MERCHANT'S ROW REHABILITATION PROJECT**  
**BARRE, VERMONT**



40 IDX Drive, Building 100, Suite 200  
 South Burlington, VT 05403  
 Drawn by: SGH Date: 3/28/19  
 Chk'd by: JKM Date: 3/28/19  
 App'd by: JKM Date: 3/28/19  
 Scale: As Shown Project: 58341.00

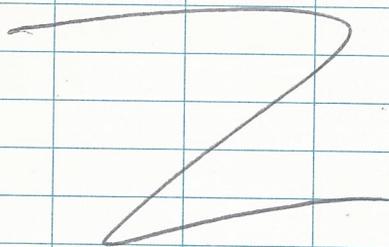


# APPENDICES

## **APPENDIX A    FIELD NOTES AND SOIL BORING LOGS**

Location Merchants Row, Barre Date 5/21/19Project / Client City of Barre0750 - VHB onsite

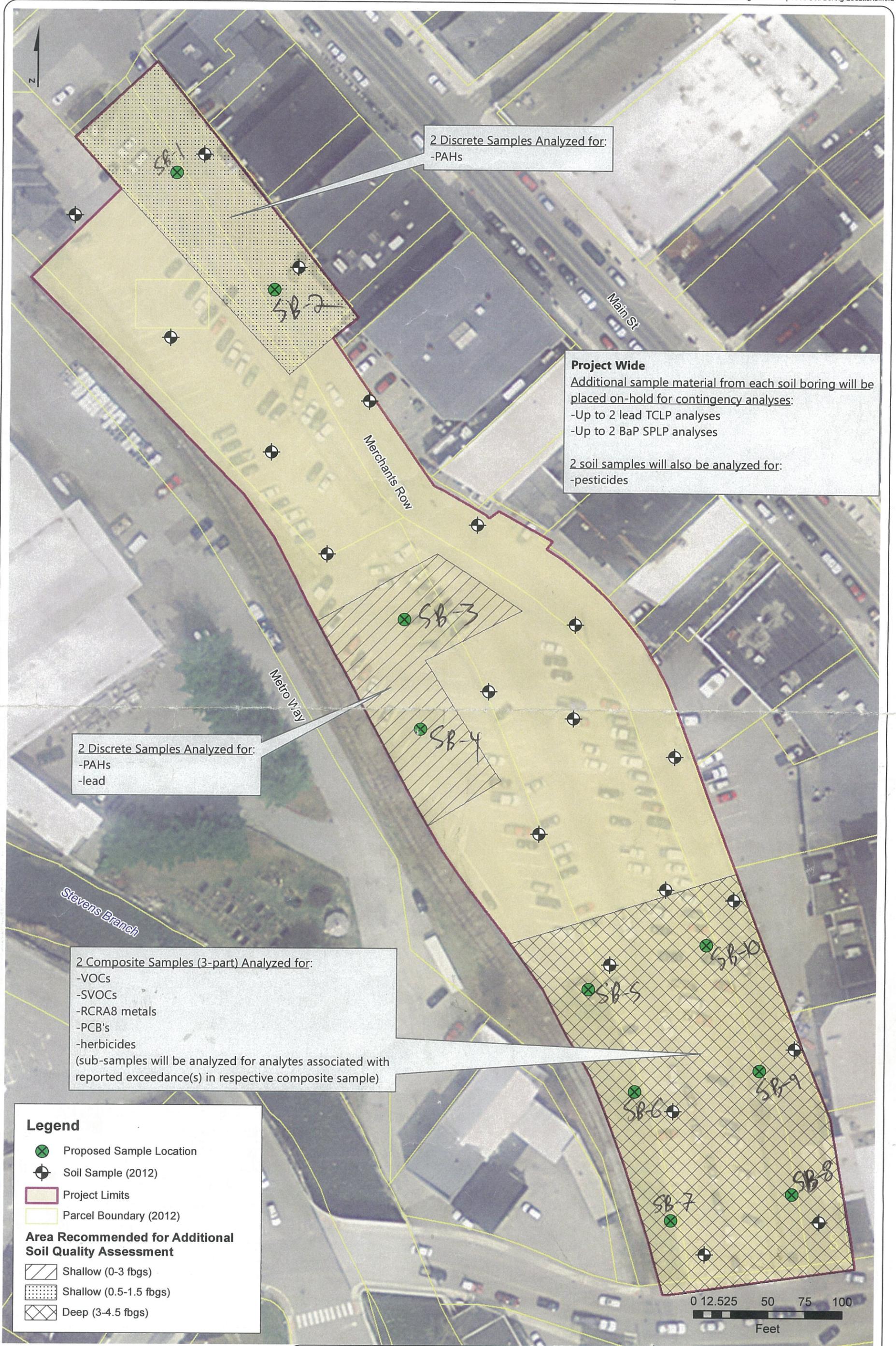
PID: MR#2 (SU: 592-908866) MiniRae300

• Calib. w/ 10ppm isobutylene  
ambient airResults  $[0.2/0.1]$  ppmw0815 GAT onsite1215 GAT offsite (half-day rate)- VHB collected GPS coord. & returned  
cones.- 1345 VHB offsite

522-60296 Janet 477-1465 0

Location \_\_\_\_\_ Date \_\_\_\_\_

Project / Client \_\_\_\_\_



2 Discrete Samples Analyzed for:  
-PAHs

**Project Wide**  
Additional sample material from each soil boring will be placed on-hold for contingency analyses:  
-Up to 2 lead TCLP analyses  
-Up to 2 BaP SPLP analyses  
  
2 soil samples will also be analyzed for:  
-pesticides

2 Discrete Samples Analyzed for:  
-PAHs  
-lead

2 Composite Samples (3-part) Analyzed for:  
-VOCs  
-SVOCs  
-RCRA8 metals  
-PCB's  
-herbicides  
(sub-samples will be analyzed for analytes associated with reported exceedance(s) in respective composite sample)

**Legend**

- ⊗ Proposed Sample Location
- ⊕ Soil Sample (2012)
- Project Limits
- Parcel Boundary (2012)

**Area Recommended for Additional Soil Quality Assessment**

- / / / / / Shallow (0-3 fbg)
- . . . . . Shallow (0.5-1.5 fbg)
- x x x x x Deep (3-4.5 fbg)

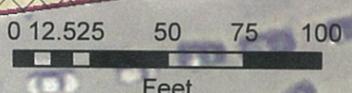


FIGURE 3: PROPOSED SOIL BORING LOCATIONS  
MERCHANT'S ROW REDEVELOPMENT PROJECT  
BARRE, VERMONT



40 IDX Drive, Building 100, Suite 200  
South Burlington, VT 05403  
Drawn by: SGH Date: 4/1/19  
Reviewed by: JKM Date: 4/1/19  
Scale: 1 in = 60 ft Project: 583414.00

Sources: Nobis (2012); VCGI (2012).  
Aerial Imagery from NAIP (2016).

























## **APPENDIX B    LABORATORY ANALYTICAL REPORTS**



# Eastern Analytical, Inc.

*professional laboratory and drilling services*

J. Kurt Muller  
Vanasse Hangen Brustlin, Inc. (VHB)  
40 IDX Drive Building 100  
South Burlington, VT 05403



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 195702  
Client Identification: Merchant's Row | 58341.00  
Date Received: 5/21/2019

Dear Mr. Muller :

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at [www.easternanalytical.com](http://www.easternanalytical.com) for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:

- Solid samples are reported on a dry weight basis, unless otherwise noted
- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery

Eastern Analytical Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269), Vermont (VT1012) and New York (12072).

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the the written approval of the laboratory.

If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample (s) 30 days from the sample receipt date.

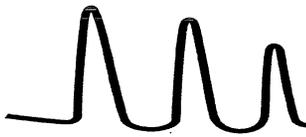
We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

*Lorraine Olashaw*  
Lorraine Olashaw, Lab Director

6.14.19  
Date

35  
# of pages (excluding cover letter)



# SAMPLE CONDITIONS PAGE

EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

**Temperature upon receipt (°C): 1.3**

**Received on ice or cold packs (Yes/No): Y**

Acceptable temperature range (°C): 0-6

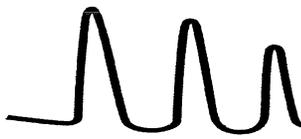
| Lab ID    | Sample ID           | Date Received | Date Sampled | Sample Matrix | % Dry Weight | Exceptions/Comments (other than thermal preservation) |
|-----------|---------------------|---------------|--------------|---------------|--------------|---|
| 195702.01 | SB-1 (2.2-3)        | 5/21/19       | 5/21/19      | soil          | 89.6         | Adheres to Sample Acceptance Policy                   |
| 195702.02 | SB-2 (1-1.5)        | 5/21/19       | 5/21/19      | soil          | 88.9         | Adheres to Sample Acceptance Policy                   |
| 195702.03 | SB-3 (0-3)          | 5/21/19       | 5/21/19      | soil          | 94.0         | Adheres to Sample Acceptance Policy                   |
| 195702.04 | SB-4 (0-3)          | 5/21/19       | 5/21/19      | soil          | 90.5         | Adheres to Sample Acceptance Policy                   |
| 195702.05 | Comp 5,6,7 (3-4.5)  | 5/21/19       | 5/21/19      | soil          | 92.2         | Adheres to Sample Acceptance Policy                   |
| 195702.06 | Comp 8,9,10 (3-4.5) | 5/21/19       | 5/21/19      | soil          | 88.7         | Adheres to Sample Acceptance Policy                   |
| 195702.07 | Trip Blank          | 5/21/19       | 5/21/19      | soil          | 100.0        | Adheres to Sample Acceptance Policy                   |

Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitability, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis. Immediate analyses, pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite, performed at the laboratory were run outside of the recommended 15 minute hold time.

All results contained in this report relate only to the above listed samples.

References include:

- 1) EPA 600/4-79-020, 1983
- 2) Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd Edition or noted Revision year.
- 3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- 4) Hach Water Analysis Handbook, 4th edition, 1992



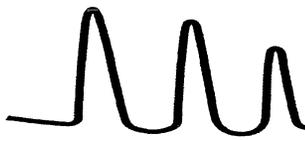
# LABORATORY REPORT

EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Client Designation: Merchant's Row | 58341.00

| Sample ID:                 | Comp 5,6,7 (3-4.5) | Comp 8,9,10 (3-4.5) | Trip Blank |
|----------------------------|--------------------|---------------------|------------|
| Lab Sample ID:             | 195702.05          | 195702.06           | 195702.07  |
| Matrix:                    | soil               | soil                | soil       |
| Date Sampled:              | 5/21/19            | 5/21/19             | 5/21/19    |
| Date Received:             | 5/21/19            | 5/21/19             | 5/21/19    |
| Units:                     | mg/kg              | mg/kg               | mg/kg      |
| Date of Analysis:          | 5/23/19            | 5/23/19             | 5/23/19    |
| Analyst:                   | VG                 | VG                  | VG         |
| Method:                    | 8260C              | 8260C               | 8260C      |
| Dilution Factor:           | 1                  | 1                   | 1          |
| Dichlorodifluoromethane    | < 0.1              | < 0.1               | < 0.1      |
| Chloromethane              | < 0.1              | < 0.1               | < 0.1      |
| Vinyl chloride             | < 0.1              | < 0.1               | < 0.1      |
| Bromomethane               | < 0.2              | < 0.2               | < 0.2      |
| Chloroethane               | < 0.1              | < 0.1               | < 0.1      |
| Trichlorofluoromethane     | < 0.1              | < 0.1               | < 0.1      |
| Diethyl Ether              | < 0.05             | < 0.05              | < 0.05     |
| Acetone                    | < 2                | < 2                 | < 2        |
| 1,1-Dichloroethene         | < 0.05             | < 0.05              | < 0.05     |
| Methylene chloride         | < 0.1              | < 0.1               | < 0.1      |
| Carbon disulfide           | < 0.1              | < 0.1               | < 0.1      |
| Methyl-t-butyl ether(MTBE) | < 0.1              | < 0.1               | < 0.1      |
| trans-1,2-Dichloroethene   | < 0.05             | < 0.05              | < 0.05     |
| 1,1-Dichloroethane         | < 0.05             | < 0.05              | < 0.05     |
| 2,2-Dichloropropane        | < 0.05             | < 0.05              | < 0.05     |
| cis-1,2-Dichloroethene     | < 0.05             | < 0.05              | < 0.05     |
| 2-Butanone(MEK)            | < 0.5              | < 0.5               | < 0.5      |
| Bromochloromethane         | < 0.05             | < 0.05              | < 0.05     |
| Tetrahydrofuran(THF)       | < 0.5              | < 0.5               | < 0.5      |
| Chloroform                 | < 0.05             | < 0.05              | < 0.05     |
| 1,1,1-Trichloroethane      | < 0.05             | < 0.05              | < 0.05     |
| Carbon tetrachloride       | < 0.05             | < 0.05              | < 0.05     |
| 1,1-Dichloropropene        | < 0.05             | < 0.05              | < 0.05     |
| Benzene                    | < 0.05             | < 0.05              | < 0.05     |
| 1,2-Dichloroethane         | < 0.05             | < 0.05              | < 0.05     |
| Trichloroethene            | < 0.05             | < 0.05              | < 0.05     |
| 1,2-Dichloropropane        | < 0.05             | < 0.05              | < 0.05     |
| Dibromomethane             | < 0.05             | < 0.05              | < 0.05     |
| Bromodichloromethane       | < 0.05             | < 0.05              | < 0.05     |
| 4-Methyl-2-pentanone(MIBK) | < 0.5              | < 0.5               | < 0.5      |
| cis-1,3-Dichloropropene    | < 0.05             | < 0.05              | < 0.05     |
| Toluene                    | < 0.05             | < 0.05              | < 0.05     |
| trans-1,3-Dichloropropene  | < 0.05             | < 0.05              | < 0.05     |
| 1,1,2-Trichloroethane      | < 0.05             | < 0.05              | < 0.05     |
| 2-Hexanone                 | < 0.1              | < 0.1               | < 0.1      |
| Tetrachloroethene          | < 0.05             | <b>0.34</b>         | < 0.05     |
| 1,3-Dichloropropane        | < 0.05             | < 0.05              | < 0.05     |
| Dibromochloromethane       | < 0.05             | < 0.05              | < 0.05     |
| 1,2-Dibromoethane(EDB)     | < 0.05             | < 0.05              | < 0.05     |
| Chlorobenzene              | < 0.05             | < 0.05              | < 0.05     |
| 1,1,1,2-Tetrachloroethane  | < 0.05             | < 0.05              | < 0.05     |
| Ethylbenzene               | < 0.05             | < 0.05              | < 0.05     |
| mp-Xylene                  | < 0.05             | < 0.05              | < 0.05     |
| o-Xylene                   | < 0.05             | < 0.05              | < 0.05     |
| Styrene                    | < 0.05             | < 0.05              | < 0.05     |
| Bromoform                  | < 0.05             | < 0.05              | < 0.05     |
| IsoPropylbenzene           | < 0.05             | < 0.05              | < 0.05     |



# LABORATORY REPORT

EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

| Sample ID:                    | Comp 5,6,7 (3-4.5) | Comp 8,9,10 (3-4.5) | Trip Blank |
|-------------------------------|--------------------|---------------------|------------|
| <b>Lab Sample ID:</b>         | 195702.05          | 195702.06           | 195702.07  |
| <b>Matrix:</b>                | soil               | soil                | soil       |
| <b>Date Sampled:</b>          | 5/21/19            | 5/21/19             | 5/21/19    |
| <b>Date Received:</b>         | 5/21/19            | 5/21/19             | 5/21/19    |
| <b>Units:</b>                 | mg/kg              | mg/kg               | mg/kg      |
| <b>Date of Analysis:</b>      | 5/23/19            | 5/23/19             | 5/23/19    |
| <b>Analyst:</b>               | VG                 | VG                  | VG         |
| <b>Method:</b>                | 8260C              | 8260C               | 8260C      |
| <b>Dilution Factor:</b>       | 1                  | 1                   | 1          |
| Bromobenzene                  | < 0.05             | < 0.05              | < 0.05     |
| 1,1,2,2-Tetrachloroethane     | < 0.05             | < 0.05              | < 0.05     |
| 1,2,3-Trichloropropane        | < 0.05             | < 0.05              | < 0.05     |
| n-Propylbenzene               | < 0.05             | < 0.05              | < 0.05     |
| 2-Chlorotoluene               | < 0.05             | < 0.05              | < 0.05     |
| 4-Chlorotoluene               | < 0.05             | < 0.05              | < 0.05     |
| 1,3,5-Trimethylbenzene        | < 0.05             | < 0.05              | < 0.05     |
| tert-Butylbenzene             | < 0.05             | < 0.05              | < 0.05     |
| 1,2,4-Trimethylbenzene        | < 0.05             | < 0.05              | < 0.05     |
| sec-Butylbenzene              | < 0.05             | < 0.05              | < 0.05     |
| 1,3-Dichlorobenzene           | < 0.05             | < 0.05              | < 0.05     |
| p-Isopropyltoluene            | < 0.05             | < 0.05              | < 0.05     |
| 1,4-Dichlorobenzene           | < 0.05             | < 0.05              | < 0.05     |
| 1,2-Dichlorobenzene           | < 0.05             | < 0.05              | < 0.05     |
| n-Butylbenzene                | < 0.05             | < 0.05              | < 0.05     |
| 1,2-Dibromo-3-chloropropane   | < 0.05             | < 0.05              | < 0.05     |
| 1,2,4-Trichlorobenzene        | < 0.05             | < 0.05              | < 0.05     |
| Hexachlorobutadiene           | < 0.05             | < 0.05              | < 0.05     |
| Naphthalene                   | < 0.1              | < 0.1               | < 0.1      |
| 1,2,3-Trichlorobenzene        | < 0.05             | < 0.05              | < 0.05     |
| 4-Bromofluorobenzene (surr)   | 97 %R              | 95 %R               | 97 %R      |
| 1,2-Dichlorobenzene-d4 (surr) | 99 %R              | 96 %R               | 97 %R      |
| Toluene-d8 (surr)             | 94 %R              | 96 %R               | 96 %R      |
| 1,2-Dichloroethane-d4 (surr)  | 85 %R              | 85 %R               | 85 %R      |



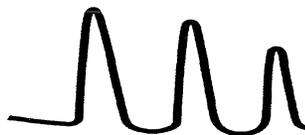
# QC REPORT

EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Client Designation: Merchant's Row | 58341.00

| Parameter Name               | Blank  | LCS          | LCSD                 | Analysis Date | Units | Limits   | RPD | Method |
|------------------------------|--------|--------------|----------------------|---------------|-------|----------|-----|--------|
| Dichlorodifluoromethane      | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Chloromethane                | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Vinyl chloride               | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Bromomethane                 | < 0.2  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Chloroethane                 | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Trichlorofluoromethane       | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Diethyl Ether                | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Acetone                      | < 2    |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,1-Dichloroethene           | < 0.05 | 1.3 (129 %R) | 1.3 (126 %R) (2 RPD) | 5/23/2019     | mg/kg | 59 - 172 | 20  | 8260C  |
| tert-Butyl Alcohol (TBA)     | < 2    |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Methylene chloride           | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Carbon disulfide             | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Methyl-t-butyl ether(MTBE)   | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Ethyl-t-butyl ether(ETBE)    | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Isopropyl ether(DIPE)        | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| tert-amyl methyl ether(TAME) | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| trans-1,2-Dichloroethene     | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,1-Dichloroethane           | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 2,2-Dichloropropane          | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| cis-1,2-Dichloroethene       | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 2-Butanone(MEK)              | < 0.5  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Bromochloromethane           | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Tetrahydrofuran(THF)         | < 0.5  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Chloroform                   | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,1,1-Trichloroethane        | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Carbon tetrachloride         | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,1-Dichloropropene          | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Benzene                      | < 0.05 | 1.1 (112 %R) | 1.1 (114 %R) (2 RPD) | 5/23/2019     | mg/kg | 66 - 142 | 20  | 8260C  |
| 1,2-Dichloroethane           | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Trichloroethene              | < 0.05 | 1.2 (117 %R) | 1.2 (117 %R) (0 RPD) | 5/23/2019     | mg/kg | 62 - 137 | 20  | 8260C  |
| 1,2-Dichloropropane          | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Dibromomethane               | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Bromodichloromethane         | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,4-Dioxane                  | < 3    |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 4-Methyl-2-pentanone(MIBK)   | < 0.5  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| cis-1,3-Dichloropropene      | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Toluene                      | < 0.05 | 1.1 (111 %R) | 1.1 (110 %R) (1 RPD) | 5/23/2019     | mg/kg | 59 - 139 | 20  | 8260C  |
| trans-1,3-Dichloropropene    | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,1,2-Trichloroethane        | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 2-Hexanone                   | < 0.1  |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Tetrachloroethene            | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,3-Dichloropropane          | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Dibromochloromethane         | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,2-Dibromoethane(EDB)       | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |
| Chlorobenzene                | < 0.05 | 1.1 (111 %R) | 1.1 (111 %R) (0 RPD) | 5/23/2019     | mg/kg | 60 - 133 | 20  | 8260C  |
| 1,1,1,2-Tetrachloroethane    | < 0.05 |              |                      | 5/23/2019     | mg/kg |          |     | 8260C  |



# QC REPORT

EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Client Designation: Merchant's Row | 58341.00

| Parameter Name                | Blank  | LCS   | LCSD  | Analysis Date | Units | Limits   | RPD | Method |
|-------------------------------|--------|-------|-------|---------------|-------|----------|-----|--------|
| Ethylbenzene                  | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| mp-Xylene                     | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| o-Xylene                      | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| Styrene                       | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| Bromoform                     | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| IsoPropylbenzene              | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| Bromobenzene                  | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,1,2,2-Tetrachloroethane     | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,2,3-Trichloropropane        | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| n-Propylbenzene               | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 2-Chlorotoluene               | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 4-Chlorotoluene               | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,3,5-Trimethylbenzene        | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| tert-Butylbenzene             | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,2,4-Trimethylbenzene        | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| sec-Butylbenzene              | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,3-Dichlorobenzene           | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| p-Isopropyltoluene            | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,4-Dichlorobenzene           | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,2-Dichlorobenzene           | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| n-Butylbenzene                | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,2-Dibromo-3-chloropropane   | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,3,5-Trichlorobenzene        | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,2,4-Trichlorobenzene        | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| Hexachlorobutadiene           | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| Naphthalene                   | < 0.1  |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 1,2,3-Trichlorobenzene        | < 0.05 |       |       | 5/23/2019     | mg/kg |          |     | 8260C  |
| 4-Bromofluorobenzene (surr)   | 99 %R  | 97 %R | 97 %R | 5/23/2019     | % Rec | 70 - 130 | 20  | 8260C  |
| 1,2-Dichlorobenzene-d4 (surr) | 97 %R  | 96 %R | 98 %R | 5/23/2019     | % Rec | 70 - 130 | 20  | 8260C  |
| Toluene-d8 (surr)             | 96 %R  | 96 %R | 94 %R | 5/23/2019     | % Rec | 70 - 130 | 20  | 8260C  |
| 1,2-Dichloroethane-d4 (surr)  | 85 %R  | 88 %R | 89 %R | 5/23/2019     | % Rec | 70 - 130 | 20  | 8260C  |

Samples were extracted and analyzed within holding time limits.

Instrumentation was calibrated in accordance with the method requirements.

The method blanks were free of contamination at the reporting limits.

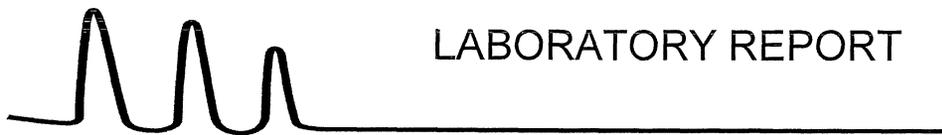
Sample surrogate recoveries met the above stated criteria.

The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria.

There were no exceptions in the analyses, unless noted.

\*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.

Analytes that exceed limits high but are not detected in the field samples do not impact the data. For analytes that show low recovery and are not detected in the field samples, a low point calibration standard has been analyzed to support the reporting limit.



# LABORATORY REPORT

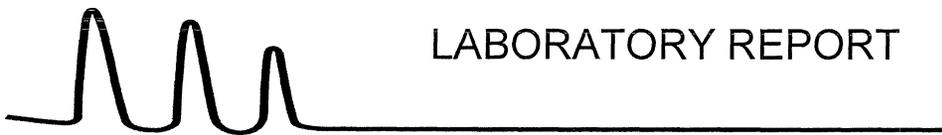
EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

|                          |                    |                        |         |
|--------------------------|--------------------|------------------------|---------|
| <b>Client Sample ID:</b> | Comp 5,6,7 (3-4.5) | <b>Date Prepared:</b>  | 5/22/19 |
| <b>Lab Sample ID:</b>    | 195702.05          | <b>Units:</b>          | mg/kg   |
| <b>Matrix:</b>           | soil               | <b>Method:</b>         | 8270D   |
| <b>Date Sampled:</b>     | 5/21/19            | <b>Analyst:</b>        | JMR     |
| <b>Date Received:</b>    | 5/21/19            | <b>Dilution Factor</b> |         |

|                             |        |   | Date Analyzed | TEF | TEQ |
|-----------------------------|--------|---|---------------|-----|-----|
| alpha-Terpineol             | < 0.4  | 1 | 5/23/19       |     |     |
| Phenol                      | < 0.08 | 1 | 5/23/19       |     |     |
| 2-Chlorophenol              | < 0.08 | 1 | 5/23/19       |     |     |
| 2,4-Dichlorophenol          | < 0.08 | 1 | 5/23/19       |     |     |
| 2,4,5-Trichlorophenol       | < 0.08 | 1 | 5/23/19       |     |     |
| 2,4,6-Trichlorophenol       | < 0.08 | 1 | 5/23/19       |     |     |
| Pentachlorophenol           | < 0.4  | 1 | 5/23/19       |     |     |
| 2-Nitrophenol               | < 0.4  | 1 | 5/23/19       |     |     |
| 4-Nitrophenol               | < 0.4  | 1 | 5/23/19       |     |     |
| 2,4-Dinitrophenol           | < 0.7  | 1 | 5/23/19       |     |     |
| 2-Methylphenol              | < 0.08 | 1 | 5/23/19       |     |     |
| 3/4-Methylphenol            | < 0.08 | 1 | 5/23/19       |     |     |
| 2,4-Dimethylphenol          | < 0.4  | 1 | 5/23/19       |     |     |
| 4-Chloro-3-methylphenol     | < 0.08 | 1 | 5/23/19       |     |     |
| 4,6-Dinitro-2-methylphenol  | < 0.4  | 1 | 5/23/19       |     |     |
| Benzoic Acid                | < 4    | 1 | 5/23/19       |     |     |
| N-Nitrosodimethylamine      | < 0.08 | 1 | 5/23/19       |     |     |
| n-Nitroso-di-n-propylamine  | < 0.08 | 1 | 5/23/19       |     |     |
| n-Nitrosodiphenylamine      | < 0.08 | 1 | 5/23/19       |     |     |
| bis(2-Chloroethyl)ether     | < 0.08 | 1 | 5/23/19       |     |     |
| bis(2-chloroisopropyl)ether | < 0.08 | 1 | 5/23/19       |     |     |
| bis(2-Chloroethoxy)methane  | < 0.08 | 1 | 5/23/19       |     |     |
| 1,3-Dichlorobenzene         | < 0.08 | 1 | 5/23/19       |     |     |
| Acetophenone                | < 0.7  | 1 | 5/23/19       |     |     |
| 1,4-Dichlorobenzene         | < 0.08 | 1 | 5/23/19       |     |     |
| 1,2-Dichlorobenzene         | < 0.08 | 1 | 5/23/19       |     |     |
| 1,2,4-Trichlorobenzene      | < 0.08 | 1 | 5/23/19       |     |     |
| 2-Chloronaphthalene         | < 0.08 | 1 | 5/23/19       |     |     |
| 4-Chlorophenyl-phenylether  | < 0.08 | 1 | 5/23/19       |     |     |
| 4-Bromophenyl-phenylether   | < 0.08 | 1 | 5/23/19       |     |     |
| Hexachloroethane            | < 0.08 | 1 | 5/23/19       |     |     |
| Hexachlorobutadiene         | < 0.08 | 1 | 5/23/19       |     |     |
| Hexachlorocyclopentadiene   | < 0.4  | 1 | 5/23/19       |     |     |
| Hexachlorobenzene           | < 0.08 | 1 | 5/23/19       |     |     |
| 4-Chloroaniline             | < 0.08 | 1 | 5/23/19       |     |     |
| 2,3-Dichloroaniline         | < 0.08 | 1 | 5/23/19       |     |     |
| 2-Nitroaniline              | < 0.4  | 1 | 5/23/19       |     |     |
| 3-Nitroaniline              | < 0.4  | 1 | 5/23/19       |     |     |
| 4-Nitroaniline              | < 0.4  | 1 | 5/23/19       |     |     |
| Aniline                     | < 0.08 | 1 | 5/23/19       |     |     |
| Benzyl alcohol              | < 0.7  | 1 | 5/23/19       |     |     |
| Nitrobenzene                | < 0.08 | 1 | 5/23/19       |     |     |
| Isophorone                  | < 0.08 | 1 | 5/23/19       |     |     |
| 2,4-Dinitrotoluene          | < 0.4  | 1 | 5/23/19       |     |     |
| 2,6-Dinitrotoluene          | < 0.4  | 1 | 5/23/19       |     |     |
| Benzidine (estimated)       | < 0.4  | 1 | 5/23/19       |     |     |



# LABORATORY REPORT

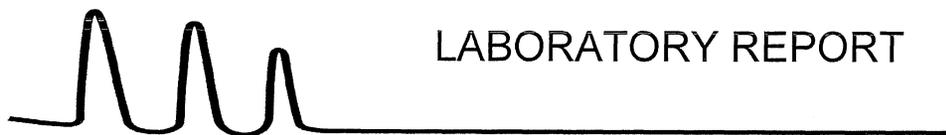
EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
 Client Designation: **Merchant's Row | 58341.00**

|                   |                    |                |         |
|-------------------|--------------------|----------------|---------|
| Client Sample ID: | Comp 5,6,7 (3-4.5) | Date Prepared: | 5/22/19 |
| Lab Sample ID:    | 195702.05          | Units:         | mg/kg   |
| Matrix:           | soil               | Method:        | 8270D   |
| Date Sampled:     | 5/21/19            | Analyst:       | JMR     |
| Date Received:    | 5/21/19            |                |         |

|                             |               | Dilution<br>Factor | Date Analyzed | TEF   | TEQ    |
|-----------------------------|---------------|--------------------|---------------|-------|--------|
| 3,3'-Dichlorobenzidine      | < 0.08        | 1                  | 5/23/19       |       |        |
| Pyridine                    | < 0.4         | 1                  | 5/23/19       |       |        |
| Azobenzene                  | < 0.08        | 1                  | 5/23/19       |       |        |
| Carbazole                   | < 0.08        | 1                  | 5/23/19       |       |        |
| Dimethylphthalate           | < 0.08        | 1                  | 5/23/19       |       |        |
| Diethylphthalate            | < 0.4         | 1                  | 5/23/19       |       |        |
| Di-n-butylphthalate         | < 0.4         | 1                  | 5/23/19       |       |        |
| Butylbenzylphthalate        | < 0.4         | 1                  | 5/23/19       |       |        |
| bis(2-Ethylhexyl)phthalate  | < 0.4         | 1                  | 5/23/19       |       |        |
| Di-n-octylphthalate         | < 0.4         | 1                  | 5/23/19       |       |        |
| Dibenzofuran                | < 0.08        | 1                  | 5/23/19       |       |        |
| Naphthalene                 | < 0.007       | 1                  | 5/23/19       |       |        |
| 2-Methylnaphthalene         | < 0.007       | 1                  | 5/23/19       |       |        |
| 1-Methylnaphthalene         | < 0.007       | 1                  | 5/23/19       |       |        |
| Acenaphthylene              | <b>0.051</b>  | 1                  | 5/23/19       |       |        |
| Acenaphthene                | <b>0.0078</b> | 1                  | 5/23/19       |       |        |
| Fluorene                    | <b>0.011</b>  | 1                  | 5/23/19       |       |        |
| Phenanthrene                | <b>0.11</b>   | 1                  | 5/23/19       |       |        |
| Anthracene                  | <b>0.038</b>  | 1                  | 5/23/19       |       |        |
| Fluoranthene                | <b>0.28</b>   | 1                  | 5/23/19       |       |        |
| Pyrene                      | <b>0.32</b>   | 1                  | 5/23/19       |       |        |
| Benzo[a]anthracene          | <b>0.17</b>   | 1                  | 5/23/19       | 0.1   | .017   |
| Chrysene                    | <b>0.19</b>   | 1                  | 5/23/19       | 0.001 | .00019 |
| Benzo[b]fluoranthene        | <b>0.21</b>   | 1                  | 5/23/19       | 0.1   | .021   |
| Benzo[k]fluoranthene        | <b>0.076</b>  | 1                  | 5/23/19       | 0.01  | .00076 |
| Benzo[a]pyrene              | <b>0.18</b>   | 1                  | 5/23/19       | 1     | .18    |
| Indeno[1,2,3-cd]pyrene      | <b>0.13</b>   | 1                  | 5/23/19       | 0.1   | .013   |
| Dibenz[a,h]anthracene       | <b>0.029</b>  | 1                  | 5/23/19       | 1     | .029   |
| Benzo[g,h,i]perylene        | <b>0.12</b>   | 1                  | 5/23/19       |       |        |
| n-Decane                    | < 0.4         | 1                  | 5/23/19       |       |        |
| n-Octadecane                | < 0.4         | 1                  | 5/23/19       |       |        |
| 2-Fluorophenol (surr)       | <b>56 %R</b>  |                    | 5/23/19       |       |        |
| Phenol-d6 (surr)            | <b>62 %R</b>  |                    | 5/23/19       |       |        |
| 2,4,6-Tribromophenol (surr) | <b>75 %R</b>  |                    | 5/23/19       |       |        |
| Nitrobenzene-D5 (surr)      | <b>61 %R</b>  |                    | 5/23/19       |       |        |
| 2-Fluorobiphenyl (surr)     | <b>66 %R</b>  |                    | 5/23/19       |       |        |
| p-Terphenyl-D14 (surr)      | <b>85 %R</b>  |                    | 5/23/19       |       |        |

TEF: Toxicity Equivalent Factor TEQ: Toxicity Equivalence to Benzo[a]pyrene  
 The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.

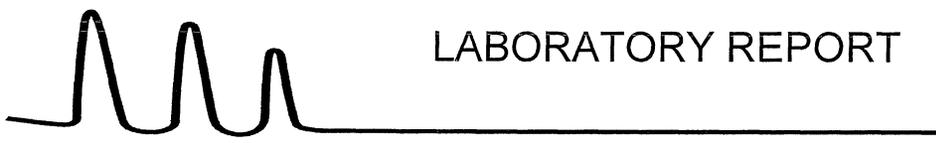


# LABORATORY REPORT

EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
Client Designation: **Merchant's Row | 58341.00**

| Client Sample ID:           | Comp 8,9,10 (3-4.5) | Date Prepared:  | 5/22/19 |
|-----------------------------|---------------------|-----------------|---------|
| Lab Sample ID:              | 195702.06           | Units:          | mg/kg   |
| Matrix:                     | soil                | Method:         | 8270D   |
| Date Sampled:               | 5/21/19             | Analyst:        | JMR     |
| Date Received:              | 5/21/19             | Dilution Factor |         |
|                             |                     | Date Analyzed   | TEF     |
|                             |                     |                 | TEQ     |
| alpha-Terpineol             | < 0.4               | 1               | 5/23/19 |
| Phenol                      | < 0.08              | 1               | 5/23/19 |
| 2-Chlorophenol              | < 0.08              | 1               | 5/23/19 |
| 2,4-Dichlorophenol          | < 0.08              | 1               | 5/23/19 |
| 2,4,5-Trichlorophenol       | < 0.08              | 1               | 5/23/19 |
| 2,4,6-Trichlorophenol       | < 0.08              | 1               | 5/23/19 |
| Pentachlorophenol           | < 0.4               | 1               | 5/23/19 |
| 2-Nitrophenol               | < 0.4               | 1               | 5/23/19 |
| 4-Nitrophenol               | < 0.4               | 1               | 5/23/19 |
| 2,4-Dinitrophenol           | < 0.7               | 1               | 5/23/19 |
| 2-Methylphenol              | < 0.08              | 1               | 5/23/19 |
| 3/4-Methylphenol            | < 0.08              | 1               | 5/23/19 |
| 2,4-Dimethylphenol          | < 0.4               | 1               | 5/23/19 |
| 4-Chloro-3-methylphenol     | < 0.08              | 1               | 5/23/19 |
| 4,6-Dinitro-2-methylphenol  | < 0.4               | 1               | 5/23/19 |
| Benzoic Acid                | < 4                 | 1               | 5/23/19 |
| N-Nitrosodimethylamine      | < 0.08              | 1               | 5/23/19 |
| n-Nitroso-di-n-propylamine  | < 0.08              | 1               | 5/23/19 |
| n-Nitrosodiphenylamine      | < 0.08              | 1               | 5/23/19 |
| bis(2-Chloroethyl)ether     | < 0.08              | 1               | 5/23/19 |
| bis(2-chloroisopropyl)ether | < 0.08              | 1               | 5/23/19 |
| bis(2-Chloroethoxy)methane  | < 0.08              | 1               | 5/23/19 |
| 1,3-Dichlorobenzene         | < 0.08              | 1               | 5/23/19 |
| Acetophenone                | < 0.7               | 1               | 5/23/19 |
| 1,4-Dichlorobenzene         | < 0.08              | 1               | 5/23/19 |
| 1,2-Dichlorobenzene         | < 0.08              | 1               | 5/23/19 |
| 1,2,4-Trichlorobenzene      | < 0.08              | 1               | 5/23/19 |
| 2-Chloronaphthalene         | < 0.08              | 1               | 5/23/19 |
| 4-Chlorophenyl-phenylether  | < 0.08              | 1               | 5/23/19 |
| 4-Bromophenyl-phenylether   | < 0.08              | 1               | 5/23/19 |
| Hexachloroethane            | < 0.08              | 1               | 5/23/19 |
| Hexachlorobutadiene         | < 0.08              | 1               | 5/23/19 |
| Hexachlorocyclopentadiene   | < 0.4               | 1               | 5/23/19 |
| Hexachlorobenzene           | < 0.08              | 1               | 5/23/19 |
| 4-Chloroaniline             | < 0.08              | 1               | 5/23/19 |
| 2,3-Dichloroaniline         | < 0.08              | 1               | 5/23/19 |
| 2-Nitroaniline              | < 0.4               | 1               | 5/23/19 |
| 3-Nitroaniline              | < 0.4               | 1               | 5/23/19 |
| 4-Nitroaniline              | < 0.4               | 1               | 5/23/19 |
| Aniline                     | < 0.08              | 1               | 5/23/19 |
| Benzyl alcohol              | < 0.7               | 1               | 5/23/19 |
| Nitrobenzene                | < 0.08              | 1               | 5/23/19 |
| Isophorone                  | < 0.08              | 1               | 5/23/19 |
| 2,4-Dinitrotoluene          | < 0.4               | 1               | 5/23/19 |
| 2,6-Dinitrotoluene          | < 0.4               | 1               | 5/23/19 |
| Benzidine (estimated)       | < 0.4               | 1               | 5/23/19 |



# LABORATORY REPORT

EAI ID#: 195702

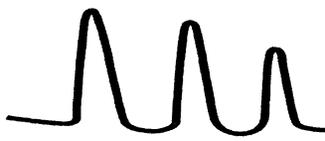
Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
 Client Designation: **Merchant's Row | 58341.00**

|                          |                     |                        |                      |            |            |
|--------------------------|---------------------|------------------------|----------------------|------------|------------|
| <b>Client Sample ID:</b> | Comp 8,9,10 (3-4.5) | <b>Date Prepared:</b>  | 5/22/19              |            |            |
| <b>Lab Sample ID:</b>    | 195702.06           | <b>Units:</b>          | mg/kg                |            |            |
| <b>Matrix:</b>           | soil                | <b>Method:</b>         | 8270D                |            |            |
| <b>Date Sampled:</b>     | 5/21/19             | <b>Analyst:</b>        | JMR                  |            |            |
| <b>Date Received:</b>    | 5/21/19             | <b>Dilution Factor</b> | <b>Date Analyzed</b> | <b>TEF</b> | <b>TEQ</b> |

|                             |              | Dilution Factor | Date Analyzed | TEF   | TEQ   |
|-----------------------------|--------------|-----------------|---------------|-------|-------|
| 3,3'-Dichlorobenzidine      | < 0.08       | 1               | 5/23/19       |       |       |
| Pyridine                    | < 0.4        | 1               | 5/23/19       |       |       |
| Azobenzene                  | < 0.08       | 1               | 5/23/19       |       |       |
| Carbazole                   | <b>0.29</b>  | 1               | 5/23/19       |       |       |
| Dimethylphthalate           | < 0.08       | 1               | 5/23/19       |       |       |
| Diethylphthalate            | < 0.4        | 1               | 5/23/19       |       |       |
| Di-n-butylphthalate         | < 0.4        | 1               | 5/23/19       |       |       |
| Butylbenzylphthalate        | < 0.4        | 1               | 5/23/19       |       |       |
| bis(2-Ethylhexyl)phthalate  | < 0.4        | 1               | 5/23/19       |       |       |
| Di-n-octylphthalate         | < 0.4        | 1               | 5/23/19       |       |       |
| Dibenzofuran                | <b>0.092</b> | 1               | 5/23/19       |       |       |
| Naphthalene                 | <b>0.11</b>  | 1               | 5/23/19       |       |       |
| 2-Methylnaphthalene         | <b>0.067</b> | 1               | 5/23/19       |       |       |
| 1-Methylnaphthalene         | <b>0.075</b> | 1               | 5/23/19       |       |       |
| Acenaphthylene              | <b>0.50</b>  | 1               | 5/23/19       |       |       |
| Acenaphthene                | <b>0.072</b> | 1               | 5/23/19       |       |       |
| Fluorene                    | <b>0.21</b>  | 1               | 5/23/19       |       |       |
| Phenanthrene                | <b>2.6</b>   | 1               | 5/23/19       |       |       |
| Anthracene                  | <b>0.56</b>  | 1               | 5/23/19       |       |       |
| Fluoranthene                | <b>4.1</b>   | 1               | 5/23/19       |       |       |
| Pyrene                      | <b>4.0</b>   | 1               | 5/23/19       |       |       |
| Benzo[a]anthracene          | <b>2.2</b>   | 1               | 5/23/19       | 0.1   | .22   |
| Chrysene                    | <b>2.6</b>   | 1               | 5/23/19       | 0.001 | .0026 |
| Benzo[b]fluoranthene        | <b>3.0</b>   | 1               | 5/23/19       | 0.1   | .3    |
| Benzo[k]fluoranthene        | <b>1.1</b>   | 1               | 5/23/19       | 0.01  | .011  |
| Benzo[a]pyrene              | <b>2.2</b>   | 1               | 5/23/19       | 1     | 2.2   |
| Indeno[1,2,3-cd]pyrene      | <b>0.73</b>  | 1               | 5/23/19       | 0.1   | .073  |
| Dibenz[a,h]anthracene       | <b>0.17</b>  | 1               | 5/23/19       | 1     | .17   |
| Benzo[g,h,i]perylene        | <b>0.53</b>  | 1               | 5/23/19       |       |       |
| n-Decane                    | < 0.4        | 1               | 5/23/19       |       |       |
| n-Octadecane                | < 0.4        | 1               | 5/23/19       |       |       |
| 2-Fluorophenol (surr)       | <b>63 %R</b> |                 | 5/23/19       |       |       |
| Phenol-d6 (surr)            | <b>70 %R</b> |                 | 5/23/19       |       |       |
| 2,4,6-Tribromophenol (surr) | <b>80 %R</b> |                 | 5/23/19       |       |       |
| Nitrobenzene-D5 (surr)      | <b>68 %R</b> |                 | 5/23/19       |       |       |
| 2-Fluorobiphenyl (surr)     | <b>73 %R</b> |                 | 5/23/19       |       |       |
| p-Terphenyl-D14 (surr)      | <b>85 %R</b> |                 | 5/23/19       |       |       |

TEF: Toxicity Equivalent Factor TEQ: Toxicity Equivalence to Benzo[a]pyrene

The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.



# QC REPORT

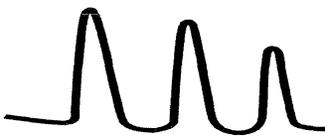
EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Batch ID: 636940-24397/S052119ABN1

Client Designation: Merchant's Row | 58341.00

| Parameter Name              | Blank  | LCS           | LCSD                   | Analysis Date | Units | Limits   | RPD | Method |
|-----------------------------|--------|---------------|------------------------|---------------|-------|----------|-----|--------|
| alpha-Terpineol             | < 0.34 | 1.4 (82 %R)   | 1.1 (67 %R) (20 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Phenol                      | < 0.07 | 2.3 (70 %R)   | 1.9 (58 %R) (17 RPD)   | 5/22/2019     | mg/kg | 15 - 130 | 30  | 8270D  |
| 2-Chlorophenol              | < 0.07 | 2.3 (69 %R)   | 1.9 (57 %R) (18 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 2,4-Dichlorophenol          | < 0.07 | 2.5 (75 %R)   | 2.1 (63 %R) (17 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 2,4,5-Trichlorophenol       | < 0.07 | 2.7 (80 %R)   | 2.3 (70 %R) (13 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 2,4,6-Trichlorophenol       | < 0.07 | 2.8 (84 %R)   | 2.3 (69 %R) (19 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| Pentachlorophenol           | < 0.34 | 2.7 (82 %R)   | 2.5 (74 %R) (11 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 2-Nitrophenol               | < 0.34 | 2.4 (71 %R)   | 2.0 (60 %R) (16 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 4-Nitrophenol               | < 0.34 | 2.8 (83 %R)   | 2.5 (74 %R) (11 RPD)   | 5/22/2019     | mg/kg | 15 - 130 | 30  | 8270D  |
| 2,4-Dinitrophenol           | < 0.7  | 2.5 (75 %R)   | 2.3 (68 %R) (11 RPD)   | 5/22/2019     | mg/kg | 15 - 130 | 30  | 8270D  |
| 2-Methylphenol              | < 0.07 | 2.5 (74 %R)   | 2.0 (61 %R) (19 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 3/4-Methylphenol            | < 0.07 | 2.7 (82 %R)   | 2.2 (67 %R) (20 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 2,4-Dimethylphenol          | < 0.34 | 2.3 (70 %R)   | 1.9 (58 %R) (18 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 4-Chloro-3-methylphenol     | < 0.07 | 2.8 (83 %R)   | 2.4 (71 %R) (15 RPD)   | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 4,6-Dinitro-2-methylphenol  | < 0.34 | 2.6 (77 %R)   | 2.4 (71 %R) (7 RPD)    | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| Benzoic Acid                | < 3.4  | < 3.4 (73 %R) | < 3.4 (65 %R) (11 RPD) | 5/22/2019     | mg/kg | 15 - 130 | 30  | 8270D  |
| N-Nitrosodimethylamine      | < 0.07 | 1.1 (67 %R)   | 0.91 (55 %R) (19 RPD)  | 5/22/2019     | mg/kg | 15 - 140 | 30  | 8270D  |
| n-Nitroso-di-n-propylamine  | < 0.07 | 1.3 (76 %R)   | 1.0 (62 %R) (20 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| n-Nitrosodiphenylamine      | < 0.07 | 1.4 (83 %R)   | 1.3 (76 %R) (9 RPD)    | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| bis(2-Chloroethyl)ether     | < 0.07 | 1.2 (70 %R)   | 0.96 (58 %R) (19 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| bis(2-chloroisopropyl)ether | < 0.07 | 1.3 (78 %R)   | 1.1 (64 %R) (19 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| bis(2-Chloroethoxy)methane  | < 0.07 | 1.2 (75 %R)   | 1.0 (61 %R) (20 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 1,3-Dichlorobenzene         | < 0.07 | 1.0 (60 %R)   | 0.83 (50 %R) (19 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acetophenone                | < 0.7  | 1.1 (65 %R)   | 0.89 (53 %R) (20 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 1,4-Dichlorobenzene         | < 0.07 | 1.0 (61 %R)   | 0.83 (50 %R) (19 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 1,2-Dichlorobenzene         | < 0.07 | 1.0 (62 %R)   | 0.85 (51 %R) (19 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 1,2,4-Trichlorobenzene      | < 0.07 | 1.1 (66 %R)   | 0.93 (56 %R) (17 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2-Chloronaphthalene         | < 0.07 | 1.2 (74 %R)   | 1.0 (62 %R) (18 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 4-Chlorophenyl-phenylether  | < 0.07 | 1.3 (79 %R)   | 1.1 (67 %R) (16 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 4-Bromophenyl-phenylether   | < 0.07 | 1.4 (82 %R)   | 1.2 (71 %R) (13 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Hexachloroethane            | < 0.07 | 0.99 (59 %R)  | 0.80 (48 %R) (21 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Hexachlorobutadiene         | < 0.07 | 1.1 (64 %R)   | 0.88 (53 %R) (18 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Hexachlorocyclopentadiene   | < 0.34 | 0.64 (38 %R)  | 0.57 (34 %R) (12 RPD)  | 5/22/2019     | mg/kg | 15 - 140 | 30  | 8270D  |
| Hexachlorobenzene           | < 0.07 | 1.4 (84 %R)   | 1.3 (75 %R) (11 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 4-Chloroaniline             | < 0.07 | 1.3 (75 %R)   | 1.0 (61 %R) (21 RPD)   | 5/22/2019     | mg/kg | 15 - 140 | 30  | 8270D  |
| 2,3-Dichloroaniline         | < 0.07 | 1.3 (76 %R)   | 1.1 (64 %R) (18 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2-Nitroaniline              | < 0.34 | 1.4 (85 %R)   | 1.2 (73 %R) (15 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 3-Nitroaniline              | < 0.34 | 1.4 (83 %R)   | 1.2 (73 %R) (13 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 4-Nitroaniline              | < 0.34 | 1.4 (82 %R)   | 1.2 (72 %R) (12 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Aniline                     | < 0.07 | 1.1 (68 %R)   | 0.92 (55 %R) (20 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzyl alcohol              | < 0.7  | 1.3 (75 %R)   | 1.1 (63 %R) (17 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Nitrobenzene                | < 0.07 | 1.2 (70 %R)   | 0.98 (59 %R) (18 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Isophorone                  | < 0.07 | 1.3 (76 %R)   | 1.0 (63 %R) (19 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2,4-Dinitrotoluene          | < 0.34 | 1.4 (84 %R)   | 1.2 (75 %R) (11 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2,6-Dinitrotoluene          | < 0.34 | 1.4 (81 %R)   | 1.2 (72 %R) (12 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzidine (estimated)       | < 0.34 | 0.74 (44 %R)  | 0.54 (33 %R) (30 RPD)  | 5/22/2019     | mg/kg | 1 - 200  | 50  | 8270D  |



# QC REPORT

EAI ID#: 195702

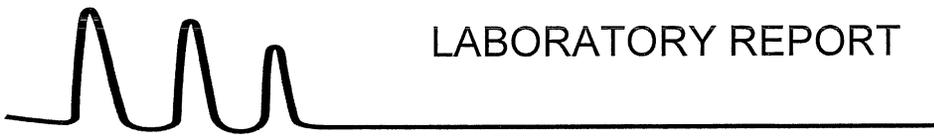
Client: Vanasse Hangen Brustlin, Inc. (VHB)

Batch ID: 636940-24397/S052119ABN1

Client Designation: Merchant's Row | 58341.00

| Parameter Name              | Blank   | LCS          | LCSD                  | Analysis Date | Units | Limits   | RPD | Method |
|-----------------------------|---------|--------------|-----------------------|---------------|-------|----------|-----|--------|
| 3,3'-Dichlorobenzidine      | < 0.07  | 1.5 (90 %R)  | 1.4 (82 %R) (9 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Pyridine                    | < 0.34  | 1.0 (62 %R)  | 0.86 (52 %R) (19 RPD) | 5/22/2019     | mg/kg | 15 - 140 | 30  | 8270D  |
| Azobenzene                  | < 0.07  | 1.4 (86 %R)  | 1.3 (75 %R) (14 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Carbazole                   | < 0.07  | 1.4 (86 %R)  | 1.3 (78 %R) (9 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Dimethylphthalate           | < 0.07  | 1.4 (83 %R)  | 1.2 (73 %R) (13 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Diethylphthalate            | < 0.34  | 1.4 (87 %R)  | 1.3 (77 %R) (12 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Di-n-butylphthalate         | < 0.34  | 1.5 (88 %R)  | 1.4 (83 %R) (6 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Butylbenzylphthalate        | < 0.34  | 1.8 (105 %R) | 1.6 (97 %R) (8 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| bis(2-Ethylhexyl)phthalate  | < 0.34  | 1.7 (105 %R) | 1.6 (96 %R) (9 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Di-n-octylphthalate         | < 0.34  | 1.7 (100 %R) | 1.5 (92 %R) (9 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Dibenzofuran                | < 0.07  | 1.3 (80 %R)  | 1.1 (67 %R) (18 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Naphthalene                 | < 0.007 | 1.1 (68 %R)  | 0.94 (56 %R) (18 RPD) | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2-Methylnaphthalene         | < 0.007 | 1.2 (73 %R)  | 1.0 (61 %R) (17 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 1-Methylnaphthalene         | < 0.007 | 1.2 (73 %R)  | 1.0 (61 %R) (18 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acenaphthylene              | < 0.007 | 1.3 (77 %R)  | 1.1 (63 %R) (19 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acenaphthene                | < 0.007 | 1.4 (83 %R)  | 1.2 (70 %R) (17 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Fluorene                    | < 0.007 | 1.3 (78 %R)  | 1.1 (67 %R) (15 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Phenanthrene                | < 0.007 | 1.4 (82 %R)  | 1.2 (74 %R) (11 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Anthracene                  | < 0.007 | 1.4 (83 %R)  | 1.2 (74 %R) (11 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Fluoranthene                | < 0.007 | 1.4 (82 %R)  | 1.2 (75 %R) (10 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Pyrene                      | < 0.007 | 1.6 (97 %R)  | 1.5 (89 %R) (9 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[a]anthracene          | < 0.007 | 1.4 (86 %R)  | 1.3 (80 %R) (8 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Chrysene                    | < 0.007 | 1.5 (93 %R)  | 1.4 (85 %R) (9 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[b]fluoranthene        | < 0.007 | 1.5 (89 %R)  | 1.4 (84 %R) (7 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[k]fluoranthene        | < 0.007 | 1.5 (88 %R)  | 1.3 (79 %R) (11 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[a]pyrene              | < 0.007 | 1.4 (86 %R)  | 1.3 (78 %R) (10 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Indeno[1,2,3-cd]pyrene      | < 0.007 | 1.5 (88 %R)  | 1.3 (78 %R) (12 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Dibenz[a,h]anthracene       | < 0.007 | 1.4 (86 %R)  | 1.3 (78 %R) (10 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[g,h,i]perylene        | < 0.007 | 1.5 (93 %R)  | 1.4 (83 %R) (12 RPD)  | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| n-Decane                    | < 0.34  | 0.96 (58 %R) | 0.77 (46 %R) (23 RPD) | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| n-Octadecane                | < 0.34  | 1.6 (97 %R)  | 1.5 (90 %R) (7 RPD)   | 5/22/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2-Fluorophenol (surr)       | 61 %R   | 63 %R        | 52 %R                 | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| Phenol-d6 (surr)            | 67 %R   | 72 %R        | 59 %R                 | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 2,4,6-Tribromophenol (surr) | 73 %R   | 84 %R        | 75 %R                 | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| Nitrobenzene-D5 (surr)      | 67 %R   | 69 %R        | 59 %R                 | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| 2-Fluorobiphenyl (surr)     | 75 %R   | 74 %R        | 61 %R                 | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |
| p-Terphenyl-D14 (surr)      | 93 %R   | 98 %R        | 89 %R                 | 5/22/2019     | mg/kg | 30 - 130 | 30  | 8270D  |

Samples were extracted and analyzed within holding time limits. Instrumentation was calibrated in accordance with the method requirements. The method blanks were free of contamination at the reporting limits. Sample surrogate recoveries met the above stated criteria. The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria. There were no exceptions in the analyses, unless noted. \*//Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.



# LABORATORY REPORT

EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
 Client Designation: **Merchant's Row | 58341.00**

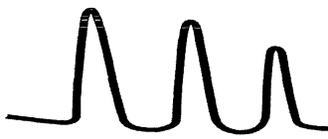
Client Sample ID: SB-1 (2.2-3)  
 Lab Sample ID: 195702.01  
 Matrix: soil  
 Date Sampled: 5/21/19  
 Date Received: 5/21/19  
 Date Prepared: 5/23/19  
 Units: mg/kg  
 Method: 8270D  
 Analyst: JMR

|                        | Results | Dilution Factor | Date Analyzed | TEF   | TEQ    |
|------------------------|---------|-----------------|---------------|-------|--------|
| Naphthalene            | 0.024   | 1               | 5/23/19       |       |        |
| 2-Methylnaphthalene    | < 0.008 | 1               | 5/23/19       |       |        |
| 1-Methylnaphthalene    | < 0.008 | 1               | 5/23/19       |       |        |
| Acenaphthylene         | 0.031   | 1               | 5/23/19       |       |        |
| Acenaphthene           | < 0.008 | 1               | 5/23/19       |       |        |
| Fluorene               | 0.018   | 1               | 5/23/19       |       |        |
| Phenanthrene           | 0.32    | 1               | 5/23/19       |       |        |
| Anthracene             | 0.032   | 1               | 5/23/19       |       |        |
| Fluoranthene           | 0.49    | 1               | 5/23/19       |       |        |
| Pyrene                 | 0.47    | 1               | 5/23/19       |       |        |
| Benzo[a]anthracene     | 0.20    | 1               | 5/23/19       | 0.1   | .02    |
| Chrysene               | 0.26    | 1               | 5/23/19       | 0.001 | .00026 |
| Benzo[b]fluoranthene   | 0.28    | 1               | 5/23/19       | 0.1   | .028   |
| Benzo[k]fluoranthene   | 0.11    | 1               | 5/23/19       | 0.01  | .0011  |
| Benzo[a]pyrene         | 0.22    | 1               | 5/23/19       | 1     | .22    |
| Indeno[1,2,3-cd]pyrene | 0.19    | 1               | 5/23/19       | 0.1   | .019   |
| Dibenz[a,h]anthracene  | 0.037   | 1               | 5/23/19       | 1     | .037   |
| Benzo[g,h,i]perylene   | 0.18    | 1               | 5/23/19       |       |        |
| p-Terphenyl-D14 (surr) | 80 %R   |                 | 5/23/19       |       |        |

TEF: Toxicity Equivalent Factor

TEQ: Toxicity Equivalence to Benzo[a]pyrene

The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.



# LABORATORY REPORT

EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
 Client Designation: **Merchant's Row | 58341.00**

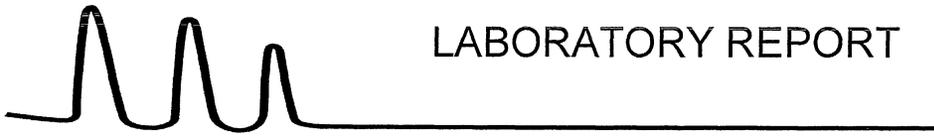
Client Sample ID: SB-2 (1-1.5)  
 Lab Sample ID: 195702.02  
 Matrix: soil  
 Date Sampled: 5/21/19  
 Date Received: 5/21/19  
 Date Prepared: 5/23/19  
 Units: mg/kg  
 Method: 8270D  
 Analyst: JMR

|                        | Results      | Dilution Factor | Date Analyzed | TEF   | TEQ      |
|------------------------|--------------|-----------------|---------------|-------|----------|
| Naphthalene            | < 0.008      | 1               | 5/23/19       |       |          |
| 2-Methylnaphthalene    | < 0.008      | 1               | 5/23/19       |       |          |
| 1-Methylnaphthalene    | < 0.008      | 1               | 5/23/19       |       |          |
| Acenaphthylene         | < 0.008      | 1               | 5/23/19       |       |          |
| Acenaphthene           | < 0.008      | 1               | 5/23/19       |       |          |
| Fluorene               | < 0.008      | 1               | 5/23/19       |       |          |
| Phenanthrene           | < 0.008      | 1               | 5/23/19       |       |          |
| Anthracene             | < 0.008      | 1               | 5/23/19       |       |          |
| Fluoranthene           | < 0.008      | 1               | 5/23/19       |       |          |
| Pyrene                 | < 0.008      | 1               | 5/23/19       |       |          |
| Benzo[a]anthracene     | < 0.008      | 1               | 5/23/19       | 0.1   | < .0008  |
| Chrysene               | < 0.008      | 1               | 5/23/19       | 0.001 | < .00000 |
| Benzo[b]fluoranthene   | < 0.008      | 1               | 5/23/19       | 0.1   | < .0008  |
| Benzo[k]fluoranthene   | < 0.008      | 1               | 5/23/19       | 0.01  | < .00008 |
| Benzo[a]pyrene         | < 0.008      | 1               | 5/23/19       | 1     | < .008   |
| Indeno[1,2,3-cd]pyrene | < 0.008      | 1               | 5/23/19       | 0.1   | < .0008  |
| Dibenz[a,h]anthracene  | < 0.008      | 1               | 5/23/19       | 1     | < .008   |
| Benzo[g,h,i]perylene   | < 0.008      | 1               | 5/23/19       |       |          |
| p-Terphenyl-D14 (surr) | <b>81 %R</b> |                 | 5/23/19       |       |          |

TEF: Toxicity Equivalent Factor

TEQ: Toxicity Equivalence to Benzo[a]pyrene

The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.



# LABORATORY REPORT

EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

Client Sample ID: SB-3 (0-3)  
 Lab Sample ID: 195702.03  
 Matrix: soil  
 Date Sampled: 5/21/19  
 Date Received: 5/21/19  
 Date Prepared: 5/23/19  
 Units: mg/kg  
 Method: 8270D  
 Analyst: JMR

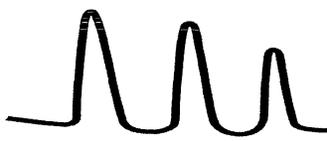
|                        | Results | Dilution Factor | Date Analyzed | TEF   | TEQ   |
|------------------------|---------|-----------------|---------------|-------|-------|
| Naphthalene            | 0.11    | 5               | 5/23/19       |       |       |
| 2-Methylnaphthalene    | 0.083   | 5               | 5/23/19       |       |       |
| 1-Methylnaphthalene    | 0.042   | 5               | 5/23/19       |       |       |
| Acenaphthylene         | 1.8     | 5               | 5/23/19       |       |       |
| Acenaphthene           | < 0.04  | 5               | 5/23/19       |       |       |
| Fluorene               | 0.17    | 5               | 5/23/19       |       |       |
| Phenanthrene           | 0.91    | 5               | 5/23/19       |       |       |
| Anthracene             | 0.61    | 5               | 5/23/19       |       |       |
| Fluoranthene           | 4.2     | 5               | 5/23/19       |       |       |
| Pyrene                 | 4.7     | 5               | 5/23/19       |       |       |
| Benzo[a]anthracene     | 3.1     | 5               | 5/23/19       | 0.1   | .31   |
| Chrysene               | 3.5     | 5               | 5/23/19       | 0.001 | .0035 |
| Benzo[b]fluoranthene   | 4.7     | 5               | 5/23/19       | 0.1   | .47   |
| Benzo[k]fluoranthene   | 1.4     | 5               | 5/23/19       | 0.01  | .014  |
| Benzo[a]pyrene         | 3.5     | 5               | 5/23/19       | 1     | 3.5   |
| Indeno[1,2,3-cd]pyrene | 1.7     | 5               | 5/23/19       | 0.1   | .17   |
| Dibenz[a,h]anthracene  | 0.43    | 5               | 5/23/19       | 1     | .43   |
| Benzo[g,h,i]perylene   | 1.5     | 5               | 5/23/19       |       |       |
| p-Terphenyl-D14 (surr) | 89 %R   |                 | 5/23/19       |       |       |

TEF: Toxicity Equivalent Factor

TEQ: Toxicity Equivalence to Benzo[a]pyrene

The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.

Detection limits elevated due to higher than normal final extract volume.



# LABORATORY REPORT

EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
 Client Designation: **Merchant's Row | 58341.00**

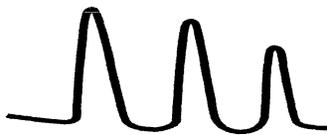
Client Sample ID: SB-4 (0-3)  
 Lab Sample ID: 195702.04  
 Matrix: soil  
 Date Sampled: 5/21/19  
 Date Received: 5/21/19  
 Date Prepared: 5/23/19  
 Units: mg/kg  
 Method: 8270D  
 Analyst: JMR

|                        | Results | Dilution Factor | Date Analyzed | TEF   | TEQ   |
|------------------------|---------|-----------------|---------------|-------|-------|
| Naphthalene            | 0.17    | 6               | 5/23/19       |       |       |
| 2-Methylnaphthalene    | 0.13    | 6               | 5/23/19       |       |       |
| 1-Methylnaphthalene    | 0.086   | 6               | 5/23/19       |       |       |
| Acenaphthylene         | 2.0     | 6               | 5/23/19       |       |       |
| Acenaphthene           | 0.048   | 6               | 5/23/19       |       |       |
| Fluorene               | 0.18    | 6               | 5/23/19       |       |       |
| Phenanthrene           | 1.2     | 6               | 5/23/19       |       |       |
| Anthracene             | 0.86    | 6               | 5/23/19       |       |       |
| Fluoranthene           | 6.0     | 6               | 5/23/19       |       |       |
| Pyrene                 | 5.9     | 6               | 5/23/19       |       |       |
| Benzo[a]anthracene     | 4.0     | 6               | 5/23/19       | 0.1   | .4    |
| Chrysene               | 4.3     | 6               | 5/23/19       | 0.001 | .0043 |
| Benzo[b]fluoranthene   | 6.1     | 6               | 5/23/19       | 0.1   | .61   |
| Benzo[k]fluoranthene   | 2.2     | 6               | 5/23/19       | 0.01  | .022  |
| Benzo[a]pyrene         | 4.1     | 6               | 5/23/19       | 1     | 4.1   |
| Indeno[1,2,3-cd]pyrene | 1.6     | 6               | 5/23/19       | 0.1   | .16   |
| Dibenz[a,h]anthracene  | 0.42    | 6               | 5/23/19       | 1     | .42   |
| Benzo[g,h,i]perylene   | 1.4     | 6               | 5/23/19       |       |       |
| p-Terphenyl-D14 (surr) | 80 %R   |                 | 5/23/19       |       |       |

TEF: Toxicity Equivalent Factor

TEQ: Toxicity Equivalence to Benzo[a]pyrene

The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.



# QC REPORT

EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Batch ID: 636941-98748/S052319PAH1

Client Designation: Merchant's Row | 58341.00

| Parameter Name         | Blank   | LCS         | LCSD                | Analysis Date | Units | Limits   | RPD | Method |
|------------------------|---------|-------------|---------------------|---------------|-------|----------|-----|--------|
| Naphthalene            | < 0.007 | 1.1 (69 %R) | 1.1 (68 %R) (2 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2-Methylnaphthalene    | < 0.007 | 1.3 (79 %R) | 1.3 (76 %R) (4 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 1-Methylnaphthalene    | < 0.007 | 1.3 (78 %R) | 1.2 (74 %R) (5 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acenaphthylene         | < 0.007 | 1.1 (69 %R) | 1.1 (68 %R) (2 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acenaphthene           | < 0.007 | 1.1 (63 %R) | 1.0 (62 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Fluorene               | < 0.007 | 1.2 (70 %R) | 1.2 (70 %R) (1 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Phenanthrene           | < 0.007 | 1.2 (74 %R) | 1.2 (73 %R) (1 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Anthracene             | < 0.007 | 1.3 (75 %R) | 1.2 (75 %R) (1 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Fluoranthene           | < 0.007 | 1.3 (76 %R) | 1.3 (76 %R) (0 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Pyrene                 | < 0.007 | 1.5 (87 %R) | 1.4 (83 %R) (5 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[a]anthracene     | < 0.007 | 1.4 (83 %R) | 1.3 (81 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Chrysene               | < 0.007 | 1.4 (86 %R) | 1.4 (84 %R) (2 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[b]fluoranthene   | < 0.007 | 1.4 (82 %R) | 1.3 (79 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[k]fluoranthene   | < 0.007 | 1.4 (83 %R) | 1.3 (80 %R) (4 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[a]pyrene         | < 0.007 | 1.3 (81 %R) | 1.3 (78 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Indeno[1,2,3-cd]pyrene | < 0.007 | 1.4 (83 %R) | 1.3 (78 %R) (6 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Dibenz[a,h]anthracene  | < 0.007 | 1.4 (83 %R) | 1.3 (81 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[g,h,i]perylene   | < 0.007 | 1.4 (81 %R) | 1.3 (78 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| p-Terphenyl-D14 (surr) | 71 %R   | 84 %R       | 82 %R               | 5/23/2019     | mg/kg | 30 - 130 |     | 8270D  |

Samples were extracted and analyzed within holding time limits.

Instrumentation was calibrated in accordance with the method requirements.

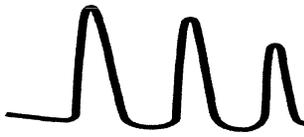
The method blanks were free of contamination at the reporting limits.

Sample surrogate recoveries met the above stated criteria.

The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria.

There were no exceptions in the analyses, unless noted.

\*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.



# LABORATORY REPORT

EAI ID#: 195702

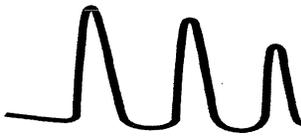
Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

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| Sample ID:               | SB-3 (0-3) | SB-4 (0-3) |
|--------------------------|------------|------------|
| Lab Sample ID:           | 195702.03  | 195702.04  |
| Matrix:                  | soil       | soil       |
| Date Sampled:            | 5/21/19    | 5/21/19    |
| Date Received:           | 5/21/19    | 5/21/19    |
| Units:                   | ug/L       | ug/L       |
| Date of Extraction/Prep: | 6/5/19     | 6/5/19     |
| Date of Analysis:        | 6/5/19     | 6/5/19     |
| Analyst:                 | JMR        | JMR        |
| Method:                  | 8270D      | 8270D      |
| Dilution Factor:         | 1          | 1          |
| Benzo[a]pyrene           | 4.4        | 4.2        |
| p-Terphenyl-D14 (surr)   | 73 %R      | 85 %R      |

Samples prepared by SPLP prior to extraction.



# QC REPORT

EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Batch ID: 636953-14142/A060419PAH1

Client Designation: Merchant's Row | 58341.00

| Parameter Name         | Blank | LCS        | LCSD               | Analysis Date | Units | Limits   | RPD | Method |
|------------------------|-------|------------|--------------------|---------------|-------|----------|-----|--------|
| Naphthalene            | < 0.1 | 16 (64 %R) | 16 (65 %R) (1 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| 2-Methylnaphthalene    | < 0.1 | 17 (67 %R) | 18 (70 %R) (4 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| 1-Methylnaphthalene    | < 0.1 | 17 (68 %R) | 18 (71 %R) (4 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Acenaphthylene         | < 0.1 | 17 (68 %R) | 18 (71 %R) (5 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Acenaphthene           | < 0.1 | 17 (69 %R) | 18 (72 %R) (5 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Fluorene               | < 0.1 | 18 (71 %R) | 19 (74 %R) (4 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Phenanthrene           | < 0.1 | 18 (72 %R) | 18 (74 %R) (2 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Anthracene             | < 0.1 | 18 (74 %R) | 19 (75 %R) (1 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Fluoranthene           | < 0.1 | 19 (76 %R) | 19 (77 %R) (1 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Pyrene                 | < 0.1 | 20 (81 %R) | 20 (79 %R) (2 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Benzo[a]anthracene     | < 0.1 | 20 (79 %R) | 20 (79 %R) (0 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Chrysene               | < 0.1 | 22 (86 %R) | 21 (86 %R) (0 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Benzo[b]fluoranthene   | < 0.1 | 20 (79 %R) | 20 (80 %R) (0 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Benzo[k]fluoranthene   | < 0.1 | 20 (81 %R) | 20 (82 %R) (0 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Benzo[a]pyrene         | < 0.1 | 20 (79 %R) | 20 (79 %R) (0 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Indeno[1,2,3-cd]pyrene | < 0.1 | 19 (75 %R) | 19 (75 %R) (1 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Dibenz[a,h]anthracene  | < 0.1 | 20 (79 %R) | 20 (79 %R) (1 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| Benzo[g,h,i]perylene   | < 0.1 | 19 (74 %R) | 19 (75 %R) (0 RPD) | 6/4/2019      | ug/L  | 40 - 140 | 20  | 8270D  |
| p-Terphenyl-D14 (surr) | 92 %R | 87 %R      | 85 %R              | 6/4/2019      | % Rec | 30 - 130 |     | 8270D  |

Samples were extracted and analyzed within holding time limits.

Instrumentation was calibrated in accordance with the method requirements.

The method blanks were free of contamination at the reporting limits.

Sample surrogate recoveries met the above stated criteria.

The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria.

There were no exceptions in the analyses, unless noted.

\*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.



# LABORATORY REPORT

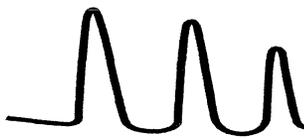
EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

|                                 |              |                       |
|---------------------------------|--------------|-----------------------|
| <b>Sample ID:</b>               | SB-2 (1-1.5) | Comp 5,6,7<br>(3-4.5) |
| <b>Lab Sample ID:</b>           | 195702.02    | 195702.05             |
| <b>Matrix:</b>                  | soil         | soil                  |
| <b>Date Sampled:</b>            | 5/21/19      | 5/21/19               |
| <b>Date Received:</b>           | 5/21/19      | 5/21/19               |
| <b>Units:</b>                   | mg/kg        | mg/kg                 |
| <b>Date of Extraction/Prep:</b> | 5/22/19      | 5/22/19               |
| <b>Date of Analysis:</b>        | 5/24/19      | 5/24/19               |
| <b>Analyst:</b>                 | SG           | SG                    |
| <b>Method:</b>                  | 8081B        | 8081B                 |
| <b>Dilution Factor:</b>         | 1            | 1                     |
| Aldrin                          | < 0.006      | < 0.005               |
| alpha-BHC                       | < 0.006      | < 0.005               |
| beta-BHC                        | < 0.006      | < 0.005               |
| Lindane(gamma-BHC)              | < 0.006      | < 0.005               |
| delta-BHC                       | < 0.006      | < 0.005               |
| Chlordane                       | < 0.02       | < 0.02                |
| 4,4'-DDT                        | < 0.006      | < 0.005               |
| 4,4'-DDE                        | < 0.006      | < 0.005               |
| 4,4'-DDD                        | < 0.006      | < 0.005               |
| Dieldrin                        | < 0.006      | < 0.005               |
| Endosulfan I                    | < 0.006      | < 0.005               |
| Endosulfan II                   | < 0.006      | < 0.005               |
| Endosulfan Sulfate              | < 0.006      | < 0.005               |
| Endrin                          | < 0.006      | < 0.005               |
| Endrin Aldehyde                 | < 0.006      | < 0.005               |
| Endrin Ketone                   | < 0.006      | < 0.005               |
| Heptachlor                      | < 0.006      | < 0.005               |
| Heptachlor Epoxide              | < 0.006      | < 0.005               |
| Methoxychlor                    | < 0.006      | < 0.005               |
| Toxaphene                       | < 0.06       | < 0.05                |
| TMX (surr)                      | <b>62 %R</b> | <b>60 %R</b>          |
| DCB (surr)                      | <b>60 %R</b> | <b>45 %R</b>          |

Florisil clean-up was performed on the sample and associated batch QC.



# QC REPORT

EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Batch ID: 636941-09400/S052219Pest1

Client Designation: Merchant's Row | 58341.00

| Parameter Name     | Blank   | LCS             | LCSD                      | Analysis Date | Units | Limits   | RPD | Method |
|--------------------|---------|-----------------|---------------------------|---------------|-------|----------|-----|--------|
| Aldrin             | < 0.005 | 0.022 (67 %R)   | 0.021 (64 %R) (5 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| alpha-BHC          | < 0.005 | 0.023 (69 %R)   | 0.022 (66 %R) (4 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| beta-BHC           | < 0.005 | 0.023 (70 %R)   | 0.025 (74 %R) (6 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Lindane(gamma-BHC) | < 0.005 | 0.024 (71 %R)   | 0.023 (70 %R) (1 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| delta-BHC          | < 0.005 | 0.021 (62 %R)   | 0.022 (66 %R) (6 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Chlordane          | < 0.02  | < 0.02 (%R N/A) | < 0.02 (%R N/A) (RPD N/A) | 5/24/2019     | mg/kg |          | 30  | 8081B  |
| 4,4'-DDT           | < 0.005 | 0.027 (80 %R)   | 0.026 (79 %R) (1 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| 4,4'-DDE           | < 0.005 | 0.024 (73 %R)   | 0.024 (71 %R) (3 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| 4,4'-DDD           | < 0.005 | 0.025 (75 %R)   | 0.024 (73 %R) (3 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Dieldrin           | < 0.005 | 0.024 (71 %R)   | 0.023 (70 %R) (1 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Endosulfan I       | < 0.005 | 0.025 (75 %R)   | 0.025 (75 %R) (0 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Endosulfan II      | < 0.005 | 0.024 (73 %R)   | 0.026 (77 %R) (5 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Endosulfan Sulfate | < 0.005 | 0.021 (62 %R)   | 0.024 (71 %R) (14 RPD)    | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Endrin             | < 0.005 | 0.026 (78 %R)   | 0.026 (78 %R) (0 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Endrin Aldehyde    | < 0.005 | 0.016 (49 %R)   | 0.019 (58 %R) (17 RPD)    | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Endrin Ketone      | < 0.005 | 0.023 (68 %R)   | 0.024 (73 %R) (7 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Heptachlor         | < 0.005 | 0.024 (71 %R)   | 0.023 (69 %R) (3 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Heptachlor Epoxide | < 0.005 | 0.024 (71 %R)   | 0.023 (70 %R) (1 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Methoxychlor       | < 0.005 | 0.026 (79 %R)   | 0.026 (79 %R) (0 RPD)     | 5/24/2019     | mg/kg | 40 - 140 | 30  | 8081B  |
| Toxaphene          | < 0.05  | < 0.05 (%R N/A) | < 0.05 (%R N/A) (RPD N/A) | 5/24/2019     | mg/kg |          |     | 8081B  |
| TMX (surr)         | 62 %R   | 64 %R           | 62 %R                     | 5/24/2019     | mg/kg | 30 - 150 | 30  | 8081B  |
| DCB (surr)         | 65 %R   | 65 %R           | 64 %R                     | 5/24/2019     | mg/kg | 30 - 150 | 30  | 8081B  |

Samples were extracted and analyzed within holding time limits.

Instrumentation was calibrated in accordance with the method requirements.

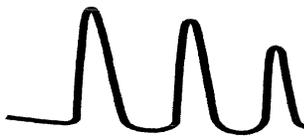
The method blanks were free of contamination at the reporting limits.

Sample surrogate recoveries met the above stated criteria.

The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria.

There were no exceptions in the analyses, unless noted.

\*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.



# LABORATORY REPORT

EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Client Designation: Merchant's Row | 58341.00

| Sample ID:               | Comp 5,6,7 (3-4.5) | Comp 8,9,10<br>(3-4.5) |
|--------------------------|--------------------|------------------------|
| Lab Sample ID:           | 195702.05          | 195702.06              |
| Matrix:                  | soil               | soil                   |
| Date Sampled:            | 5/21/19            | 5/21/19                |
| Date Received:           | 5/21/19            | 5/21/19                |
| % Solid:                 | 92.2               | 88.7                   |
| Units:                   | mg/kg              | mg/kg                  |
| Date of Extraction/Prep: | 5/22/19            | 5/22/19                |
| Date of Analysis:        | 5/23/19            | 5/23/19                |
| Analyst:                 | SG                 | SG                     |
| Extraction Method:       | 3540C              | 3540C                  |
| Analysis Method:         | 8082A              | 8082A                  |
| Dilution Factor:         | 1                  | 1                      |

|            |              |              |
|------------|--------------|--------------|
| PCB-1016   | < 0.02       | < 0.02       |
| PCB-1221   | < 0.02       | < 0.02       |
| PCB-1232   | < 0.02       | < 0.02       |
| PCB-1242   | < 0.02       | < 0.02       |
| PCB-1248   | < 0.02       | < 0.02       |
| PCB-1254   | < 0.02       | < 0.02       |
| PCB-1260   | < 0.02       | < 0.02       |
| PCB-1262   | < 0.02       | < 0.02       |
| PCB-1268   | < 0.02       | < 0.02       |
| TMX (surr) | <b>92 %R</b> | <b>77 %R</b> |
| DCB (surr) | <b>63 %R</b> | <b>58 %R</b> |

Acid clean-up was performed on the samples and associated batch QC.



# QC REPORT

EAI ID#: 195702

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Batch ID: 636941-09444/S052219PCB1

Client Designation: Merchant's Row | 58341.00

| Parameter Name | Blank  | LCS             | LCSD                      | Analysis Date | Units | Limits   | RPD | Method |
|----------------|--------|-----------------|---------------------------|---------------|-------|----------|-----|--------|
| PCB-1016       | < 0.02 | 0.14 (102 %R)   | 0.14 (105 %R) (2 RPD)     | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8082A  |
| PCB-1221       | < 0.02 | < 0.02 (%R N/A) | < 0.02 (%R N/A) (RPD N/A) | 5/23/2019     | mg/kg |          |     | 8082A  |
| PCB-1232       | < 0.02 | < 0.02 (%R N/A) | < 0.02 (%R N/A) (RPD N/A) | 5/23/2019     | mg/kg |          |     | 8082A  |
| PCB-1242       | < 0.02 | < 0.02 (%R N/A) | < 0.02 (%R N/A) (RPD N/A) | 5/23/2019     | mg/kg |          |     | 8082A  |
| PCB-1248       | < 0.02 | < 0.02 (%R N/A) | < 0.02 (%R N/A) (RPD N/A) | 5/23/2019     | mg/kg |          |     | 8082A  |
| PCB-1254       | < 0.02 | < 0.02 (%R N/A) | < 0.02 (%R N/A) (RPD N/A) | 5/23/2019     | mg/kg |          |     | 8082A  |
| PCB-1260       | < 0.02 | 0.13 (96 %R)    | 0.13 (97 %R) (2 RPD)      | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8082A  |
| PCB-1262       | < 0.02 | < 0.02 (%R N/A) | < 0.02 (%R N/A) (RPD N/A) | 5/23/2019     | mg/kg |          |     | 8082A  |
| PCB-1268       | < 0.02 | < 0.02 (%R N/A) | < 0.02 (%R N/A) (RPD N/A) | 5/23/2019     | mg/kg |          |     | 8082A  |
| TMX (surr)     | 97 %R  | 94 %R           | 93 %R                     | 5/23/2019     | % Rec | 30 - 150 | 30  | 8082A  |
| DCB (surr)     | 98 %R  | 95 %R           | 95 %R                     | 5/23/2019     | % Rec | 30 - 150 | 30  | 8082A  |

Samples were extracted and analyzed within holding time limits.

Instrumentation was calibrated in accordance with the method requirements.

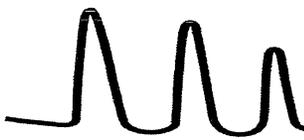
The method blanks were free of contamination at the reporting limits.

Sample surrogate recoveries met the above stated criteria.

The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria.

There were no exceptions in the analyses, unless noted.

\*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.



# LABORATORY REPORT

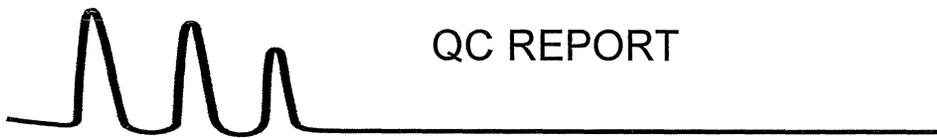
EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

|                       |            |            |                          |              |                         |               |                |
|-----------------------|------------|------------|--------------------------|--------------|-------------------------|---------------|----------------|
| <b>Sample ID:</b>     | SB-3 (0-3) | SB-4 (0-3) |                          |              |                         |               |                |
| <b>Lab Sample ID:</b> | 195702.03  | 195702.04  |                          |              |                         |               |                |
| <b>Matrix:</b>        | soil       | soil       |                          |              |                         |               |                |
| <b>Date Sampled:</b>  | 5/21/19    | 5/21/19    |                          |              |                         |               |                |
| <b>Date Received:</b> | 5/21/19    | 5/21/19    |                          |              |                         |               |                |
| <b>Lead</b>           | <b>8.2</b> | <b>26</b>  | <b>Analytical Matrix</b> | <b>Units</b> | <b>Date of Analysis</b> | <b>Method</b> | <b>Analyst</b> |
|                       |            |            | SolTotDry                | mg/kg        | 5/22/19                 | 6020          | DS             |

|                       |                    |                     |                          |              |                         |               |                |
|-----------------------|--------------------|---------------------|--------------------------|--------------|-------------------------|---------------|----------------|
| <b>Sample ID:</b>     | Comp 5,6,7 (3-4.5) | Comp 8,9,10 (3-4.5) |                          |              |                         |               |                |
| <b>Lab Sample ID:</b> | 195702.05          | 195702.06           |                          |              |                         |               |                |
| <b>Matrix:</b>        | soil               | soil                |                          |              |                         |               |                |
| <b>Date Sampled:</b>  | 5/21/19            | 5/21/19             |                          |              |                         |               |                |
| <b>Date Received:</b> | 5/21/19            | 5/21/19             |                          |              |                         |               |                |
| <b>Arsenic</b>        | <b>6.1</b>         | <b>5.6</b>          | <b>Analytical Matrix</b> | <b>Units</b> | <b>Date of Analysis</b> | <b>Method</b> | <b>Analyst</b> |
| <b>Barium</b>         | <b>17</b>          | <b>29</b>           | SolTotDry                | mg/kg        | 5/22/19                 | 6020          | DS             |
| <b>Cadmium</b>        | < 0.5              | < 0.5               | SolTotDry                | mg/kg        | 5/22/19                 | 6020          | DS             |
| <b>Chromium</b>       | <b>16</b>          | <b>17</b>           | SolTotDry                | mg/kg        | 5/22/19                 | 6020          | DS             |
| <b>Lead</b>           | <b>9.4</b>         | <b>16</b>           | SolTotDry                | mg/kg        | 5/22/19                 | 6020          | DS             |
| <b>Mercury</b>        | < 0.1              | < 0.1               | SolTotDry                | mg/kg        | 5/22/19                 | 6020          | DS             |
| <b>Selenium</b>       | < 0.5              | < 0.5               | SolTotDry                | mg/kg        | 5/22/19                 | 6020          | DS             |
| <b>Silver</b>         | < 0.5              | < 0.5               | SolTotDry                | mg/kg        | 5/22/19                 | 6020          | DS             |



# QC REPORT

EAI ID#: 195702

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

| Parameter Name | Blank | LCS          | LCSD | Units    | Date of Analysis | Limits   | RPD | Method |
|----------------|-------|--------------|------|----------|------------------|----------|-----|--------|
| Arsenic        | < 0.5 | 39 (98 %R)   |      | NA mg/kg | 5/22/19          | 80 - 120 | 20  | 6020   |
| Barium         | < 0.5 | 38 (95 %R)   |      | NA mg/kg | 5/22/19          | 80 - 120 | 20  | 6020   |
| Cadmium        | < 0.5 | 39 (98 %R)   |      | NA mg/kg | 5/22/19          | 80 - 120 | 20  | 6020   |
| Chromium       | < 0.5 | 38 (96 %R)   |      | NA mg/kg | 5/22/19          | 80 - 120 | 20  | 6020   |
| Lead           | < 0.5 | 37 (93 %R)   |      | NA mg/kg | 5/22/19          | 80 - 120 | 20  | 6020   |
| Mercury        | < 0.1 | 0.37 (93 %R) |      | NA mg/kg | 5/22/19          | 80 - 120 | 20  | 6020   |
| Selenium       | < 0.5 | 41 (102 %R)  |      | NA mg/kg | 5/22/19          | 80 - 120 | 20  | 6020   |
| Silver         | < 0.5 | 39 (97 %R)   |      | NA mg/kg | 5/22/19          | 80 - 120 | 20  | 6020   |

Samples were analyzed within holding times unless noted on the sample results page.  
 Instrumentation was calibrated in accordance with the method requirements.  
 The method blanks were free of contamination at the reporting limits.  
 The associated matrix spikes and/or Laboratory Control Samples met the above stated criteria.  
 Exceptions to the above statements are flagged or noted above or on the QC Narrative page.  
 \*! Flagged analyte recoveries deviated from the QA/QC limits.



Thursday, May 30, 2019

Attn: Front Office  
Eastern Analytical  
25 Chenell Drive  
Concord, NH 03301

Project ID: 195702  
SDG ID: GCD20731  
Sample ID#s: CD20731 - CD20732

This laboratory is in compliance with the NELAC requirements of procedures used except where indicated.

This report contains results for the parameters tested, under the sampling conditions described on the Chain Of Custody, as received by the laboratory. This report is incomplete unless all pages indicated in the pagination at the bottom of the page are included.

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

A scanned version of the COC form accompanies the analytical report and is an exact duplicate of the original.

If you are the client above and have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext.200. The contents of this report cannot be discussed with anyone other than the client listed above without their written consent.

Sincerely yours,

A handwritten signature in cursive script that reads "Phyllis Shiller".

Phyllis Shiller

Laboratory Director

NELAC - #NY11301  
CT Lab Registration #PH-0618  
MA Lab Registration #M-CT007  
ME Lab Registration #CT-007  
NH Lab Registration #213693-A,B

NJ Lab Registration #CT-003  
NY Lab Registration #11301  
PA Lab Registration #68-03530  
RI Lab Registration #63  
UT Lab Registration #CT00007  
VT Lab Registration #VT11301



Environmental Laboratories, Inc.  
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045  
Tel. (860) 645-1102 Fax (860) 645-0823

## Sample Id Cross Reference

May 30, 2019

SDG I.D.: GCD20731

Project ID: 195702

---

| Client Id           | Lab Id  | Matrix |
|---------------------|---------|--------|
| COMP 5,6,7 (3-4.5)  | CD20731 | SOIL   |
| COMP 8,9,10 (3-4.5) | CD20732 | SOIL   |



Environmental Laboratories, Inc.  
 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045  
 Tel. (860) 645-1102 Fax (860) 645-0823

**Analysis Report**  
 May 30, 2019

FOR: Attn: Front Office  
 Eastern Analytical  
 25 Chenell Drive  
 Concord, NH 03301

Sample Information

Matrix: SOIL  
 Location Code: EASTANAL  
 Rush Request: Standard  
 P.O.#: 50115

Custody Information

Collected by:  
 Received by: CP  
 Analyzed by: see "By" below

Date      Time

05/21/19      10:50  
 05/23/19      16:42

Laboratory Data

SDG ID: GCD20731  
 Phoenix ID: CD20731

Project ID: 195702  
 Client ID: COMP 5,6,7 (3-4.5)

| Parameter                            | Result    | RL/<br>PQL | Units | Dilution | Date/Time | By  | Reference    |
|--------------------------------------|-----------|------------|-------|----------|-----------|-----|--------------|
| Percent Solid                        | 93        |            | %     |          | 05/23/19  | ML  | SW846-%Solid |
| Soil Extraction for Herbicide        | Completed |            |       |          | 05/24/19  | C/D | SW8151A      |
| <b><u>Chlorinated Herbicides</u></b> |           |            |       |          |           |     |              |
| 2,4,5-T                              | ND        | 89         | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| 2,4,5-TP (Silvex)                    | ND        | 89         | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| 2,4-D                                | ND        | 180        | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| 2,4-DB                               | ND        | 890        | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| Dalapon                              | ND        | 89         | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| Dicamba                              | ND        | 89         | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| Dichloroprop                         | ND        | 130        | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| Dinoseb                              | ND        | 89         | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| MCPA                                 | ND        | 27000      | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| MCPP                                 | ND        | 27000      | ug/Kg | 10       | 05/29/19  | CW  | SW8151A      |
| <b><u>QA/QC Surrogates</u></b>       |           |            |       |          |           |     |              |
| % DCAA                               | 69        |            | %     | 10       | 05/29/19  | CW  | 30 - 150 %   |
| % DCAA (Confirmation)                | 72        |            | %     | 10       | 05/29/19  | CW  | 30 - 150 %   |

| Parameter | Result | RL/<br>PQL | Units | Dilution | Date/Time | By | Reference |
|-----------|--------|------------|-------|----------|-----------|----|-----------|
|-----------|--------|------------|-------|----------|-----------|----|-----------|

RL/PQL=Reporting/Practical Quantitation Level ND=Not Detected BRL=Below Reporting Level  
QA/QC Surrogates: Surrogates are compounds (preceeded with a %) added by the lab to determine analysis efficiency. Surrogate results(%) listed in the report are not "detected" compounds.

**Comments:**

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

If you are the client above and have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext.200.  
The contents of this report cannot be discussed with anyone other than the client listed above without their written consent.



Phyllis Shiller, Laboratory Director

May 30, 2019

Reviewed and Released by: Bobbi Aloisa, Vice President



Environmental Laboratories, Inc.  
 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045  
 Tel. (860) 645-1102 Fax (860) 645-0823

**Analysis Report**  
 May 30, 2019

FOR: Attn: Front Office  
 Eastern Analytical  
 25 Chenell Drive  
 Concord, NH 03301

Sample Information

Matrix: SOIL  
 Location Code: EASTANAL  
 Rush Request: Standard  
 P.O.#: 50115

Custody Information

Collected by:  
 Received by: CP  
 Analyzed by: see "By" below

Date      Time  
 05/21/19      11:50  
 05/23/19      16:42

Laboratory Data

SDG ID: GCD20731  
 Phoenix ID: CD20732

Project ID: 195702  
 Client ID: COMP 8,9,10 (3-4.5)

| Parameter                     | Result    | RL/<br>PQL | Units | Dilution | Date/Time | By  | Reference    |
|-------------------------------|-----------|------------|-------|----------|-----------|-----|--------------|
| Percent Solid                 | 87        |            | %     |          | 05/23/19  | ML  | SW846-%Solid |
| Soil Extraction for Herbicide | Completed |            |       |          | 05/24/19  | C/D | SW8151A      |

Chlorinated Herbicides

|                   |    |       |       |    |          |    |         |
|-------------------|----|-------|-------|----|----------|----|---------|
| 2,4,5-T           | ND | 94    | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| 2,4,5-TP (Silvex) | ND | 94    | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| 2,4-D             | ND | 190   | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| 2,4-DB            | ND | 940   | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| Dalapon           | ND | 94    | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| Dicamba           | ND | 94    | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| Dichloroprop      | ND | 140   | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| Dinoseb           | ND | 94    | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| MCPA              | ND | 28000 | ug/Kg | 10 | 05/29/19 | CW | SW8151A |
| MCPP              | ND | 28000 | ug/Kg | 10 | 05/29/19 | CW | SW8151A |

QA/QC Surrogates

|                       |    |  |   |    |          |    |            |
|-----------------------|----|--|---|----|----------|----|------------|
| % DCAA                | 65 |  | % | 10 | 05/29/19 | CW | 30 - 150 % |
| % DCAA (Confirmation) | 70 |  | % | 10 | 05/29/19 | CW | 30 - 150 % |

Project ID: 195702

Phoenix I.D.: CD20732

Client ID: COMP 8,9,10 (3-4.5)

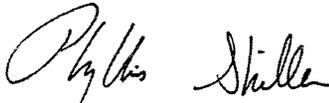
| Parameter | Result | RL/<br>PQL | Units | Dilution | Date/Time | By | Reference |
|-----------|--------|------------|-------|----------|-----------|----|-----------|
|-----------|--------|------------|-------|----------|-----------|----|-----------|

RL/PQL=Reporting/Practical Quantitation Level ND=Not Detected BRL=Below Reporting Level  
QA/QC Surrogates: Surrogates are compounds (preceeded with a %) added by the lab to determine analysis efficiency. Surrogate results(%) listed in the report are not "detected" compounds.

**Comments:**

All soils, solids and sludges are reported on a dry weight basis unless otherwise noted in the sample comments.

If you are the client above and have any questions concerning this testing, please do not hesitate to contact Phoenix Client Services at ext.200.  
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Phyllis Shiller, Laboratory Director

May 30, 2019

Reviewed and Released by: Bobbi Aloisa, Vice President



Environmental Laboratories, Inc.  
 587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045  
 Tel. (860) 645-1102 Fax (860) 645-0823

# QA/QC Report

May 30, 2019

## QA/QC Data

SDG I.D.: GCD20731

| Parameter  | Blk   |       | LCS<br>% | LCSD<br>% | LCS<br>RPD | MS<br>% | MSD<br>% | MS<br>RPD | %<br>Rec<br>Limits | %<br>RPD<br>Limits |
|--|-------|-------|----------|-----------|------------|---------|----------|-----------|--------------------|--------------------|
|  | Blank | RL    |          |           |            |         |          |           |                    |                    |
| QA/QC Batch 480387 (ug/Kg), QC Sample No: CD21069 10X (CD20731, CD20732) |       |       |          |           |            |         |          |           |                    |                    |
| <b>Chlorinated Herbicides - Soil</b>                                     |       |       |          |           |            |         |          |           |                    |                    |
| 2,4,5-T  | ND    | 83    | 77       | 71        | 8.1        | 81      | 77       | 5.1       | 40-140             | 30                 |
| 2,4,5-TP (Silvex)  | ND    | 83    | 84       | 76        | 10.0       | 87      | 83       | 4.7       | 40-140             | 30                 |
| 2,4-D  | ND    | 170   | 67       | 60        | 11.0       | 68      | 86       | 23.4      | 40-140             | 30                 |
| 2,4-DB   | ND    | 1700  | 83       | 79        | 4.9        | 89      | 111      | 22.0      | 40-140             | 30                 |
| Dalapon  | ND    | 83    | 63       | 67        | 6.2        | 75      | 66       | 12.8      | 40-140             | 30                 |
| Dicamba  | ND    | 83    | 98       | 92        | 6.3        | 104     | 94       | 10.1      | 40-140             | 30                 |
| Dichloroprop   | ND    | 83    | 86       | 88        | 2.3        | 108     | 108      | 0.0       | 40-140             | 30                 |
| Dinoseb  | ND    | 83    | 114      | 106       | 7.3        | 85      | 88       | 3.5       | 40-140             | 30                 |
| MCPA   | ND    | 25000 | 70       | 59        | 17.1       | 74      | 63       | 16.1      | 40-140             | 30                 |
| MCPP   | ND    | 25000 | 114      | 118       | 3.4        | 86      | 87       | 1.2       | 40-140             | 30                 |
| % DCAA (Surrogate Rec)   | 61    | %     | 71       | 65        | 8.8        | 71      | 67       | 5.8       | 30-150             | 30                 |
| % DCAA (Surrogate Rec) (Confirm)   | 66    | %     | 76       | 74        | 2.7        | 84      | 79       | 6.1       | 30-150             | 30                 |

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

- RPD - Relative Percent Difference
- LCS - Laboratory Control Sample
- LCSD - Laboratory Control Sample Duplicate
- MS - Matrix Spike
- MS Dup - Matrix Spike Duplicate
- NC - No Criteria
- Intf - Interference

  
 Phyllis Shiller, Laboratory Director  
 May 30, 2019

Thursday, May 30, 2019

Criteria: None

State: VT

Sample No      Acode      Phoenix Analyte

Criteria

Result

RL

Criteria

RL      Analysis  
Criteria      Units

### Sample Criteria Exceedances Report

GCD20731 - EASTANAL

\*\*\* No Data to Display \*\*\*

Phoenix Laboratories does not assume responsibility for the data contained in this exceedance report. It is provided as an additional tool to identify requested criteria exceedances. All efforts are made to ensure the accuracy of the data (obtained from appropriate agencies). A lack of exceedance information does not necessarily suggest conformance to the criteria. It is ultimately the site professional's responsibility to determine appropriate compliance.



**Environmental Laboratories, Inc.**  
587 East Middle Turnpike, P.O.Box 370, Manchester, CT 06045  
Tel. (860) 645-1102 Fax (860) 645-0823



## Analysis Comments

May 30, 2019

SDG I.D.: GCD20731

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The following analysis comments are made regarding exceptions to criteria not already noted in the Analysis Report or QA/QC Report:

### ***Herbicide Narration***

**AU-ECD2 05/28/19-1:** CD20731, CD20732

The following Continuing Calibration compounds did not meet % deviation criteria:

Samples: CD20731, CD20732

Preceding CC 528A064 - None.

Succeeding CC 528A075 - MCPA (6) 16%L (15%)

# CHAIN-OF-CUSTODY RECORD



Sample ID Date Sampled Matrix aParameters

Comp 5,6,7 (3-4.5) | 5/21/2019 | soil | Subcontract - Herbicides 8151

20731

Comp 8,9,10 (3-4.5) | 5/21/2019 | soil | Subcontract - Herbicides 8151

20732

EAI ID# 195702 Page 1

EAI ID# 195702 Project State: VT

Project ID: 0

Company Phoenix Environmental Labs  
Address 587 East Middle Turnpike  
Address Manchester, CT 06040  
Account #  
Phone # (860) 645-1102

Results Needed: Preferred Date: Standard

RUSH Due Date: \_\_\_\_\_

QC Deliverables  
 A  A+  B  B+  C  MA MCP

Notes about project:  
Email login confirmation, pdf of results and  
invoice to customerservice@easternanalytical.com.

PO #: 50115 EAI ID# 195702

Data Deliverable (circle)  
Excel NH EMD EQUIS ME EGAD

Call prior to analyzing, if RUSH charges will be applied

Samples Collected by: *S-23-19*

Relinquished by: *WCP* Date/Time: *5-23-19*  
Received by: *[Signature]* Date/Time: *5-23-19*

Eastern Analytical, Inc. 25 Chenell Dr. Concord, NH 03301

Phone: (603) 228-0525 1-800-287-0525

customerservice@easternanalytical.com

As a subcontract lab to EAI, you will defend, indemnify and hold Eastern Analytical, Inc., its officers, employees, and agents harmless from and against any and all liability, loss, expense or claims for injury or damages arising out of the performance against this chain of custody but only in proportion to and to the extent such liability, loss, expense, or claims for injury or damages are caused by or result from the negligent or intentional acts or omissions of you as a subcontract lab, your officers, agents or employees





# Eastern Analytical, Inc.

*professional laboratory and drilling services*

J. Kurt Muller  
Vanasse Hangen Brustlin, Inc. (VHB)  
40 IDX Drive Building 100  
South Burlington, VT 05403



Subject: Laboratory Report

Eastern Analytical, Inc. ID: 195703  
Client Identification: Merchant's Row | 58341.00  
Date Received: 5/21/2019

Dear Mr. Muller :

Enclosed please find the laboratory report for the above identified project. All analyses were performed in accordance with our QA/QC Program. Unless otherwise stated, holding times, preservation techniques, container types, and sample conditions adhered to EPA Protocol. Samples which were collected by Eastern Analytical, Inc. (EAI) were collected in accordance with approved EPA procedures. Eastern Analytical, Inc. certifies that the enclosed test results meet all requirements of NELAP and other applicable state certifications. Please refer to our website at [www.easternanalytical.com](http://www.easternanalytical.com) for a copy of our NELAP certificate and accredited parameters.

The following standard abbreviations and conventions apply to all EAI reports:

- Solid samples are reported on a dry weight basis, unless otherwise noted
- < : "less than" followed by the reporting limit
- > : "greater than" followed by the reporting limit
- %R : % Recovery

Eastern Analytical Inc. maintains certification in the following states: Connecticut (PH-0492), Maine (NH005), Massachusetts (M-NH005), New Hampshire/NELAP (1012), Rhode Island (269), Vermont (VT1012) and New York (12072).

The following information is contained within this report: Sample Conditions summary, Analytical Results/Data, Quality Control data (if requested) and copies of the Chain of Custody. This report may not be reproduced except in full, without the the written approval of the laboratory.

If you have any questions regarding the results contained within, please feel free to directly contact me or the chemist(s) who performed the testing in question. Unless otherwise requested, we will dispose of the sample (s) 30 days from the sample receipt date.

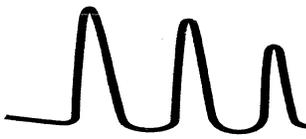
We appreciate this opportunity to be of service and look forward to your continued patronage.

Sincerely,

*Lorraine Olashaw*  
Lorraine Olashaw, Lab Director

6.14.19  
Date

11  
# of pages (excluding cover letter)



# SAMPLE CONDITIONS PAGE

EAI ID#: 195703

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

**Temperature upon receipt (°C): 1.3**

Acceptable temperature range (°C): 0-6

**Received on ice or cold packs (Yes/No): Y**

| Lab ID    | Sample ID      | Date Received | Date Sampled | Sample Matrix | % Dry Weight | Exceptions/Comments (other than thermal preservation)            |
|-----------|----------------|---------------|--------------|---------------|--------------|--|
| 195703.01 | SB-1 (0.5-1.5) | 5/21/19       | 5/21/19      | soil          | 84.8         | Adheres to Sample Acceptance Policy                              |
| 195703.02 | SB-6 (3-4.5)   | 5/21/19       | 5/21/19      | soil          |              | Placed on hold, then cancelled pending results of other samples. |
| 195703.03 | SB-5 (3-4.5)   | 5/21/19       | 5/21/19      | soil          |              | Placed on hold, then cancelled pending results of other samples. |
| 195703.04 | SB-7 (3-4.5)   | 5/21/19       | 5/21/19      | soil          |              | Placed on hold, then cancelled pending results of other samples. |
| 195703.05 | SB-8 (3-4.5)   | 5/21/19       | 5/21/19      | soil          | 83.1         | Adheres to Sample Acceptance Policy                              |
| 195703.06 | SB-9 (3-4.5)   | 5/21/19       | 5/21/19      | soil          | 88.9         | Adheres to Sample Acceptance Policy                              |
| 195703.07 | SB-10 (3-4.5)  | 5/21/19       | 5/21/19      | soil          | 92.8         | Adheres to Sample Acceptance Policy                              |

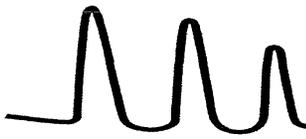
Samples were properly preserved and the pH measured when applicable unless otherwise noted. Analysis of solids for pH, Flashpoint, Ignitability, Paint Filter, Corrosivity, Conductivity and Specific Gravity are reported on an "as received" basis.

Immediate analyses, pH, Total Residual Chlorine, Dissolved Oxygen and Sulfite, performed at the laboratory were run outside of the recommended 15 minute hold time.

All results contained in this report relate only to the above listed samples.

References include:

- 1) EPA 600/4-79-020, 1983
- 2) Standard Methods for Examination of Water and Wastewater, 20th, 21st, 22nd & 23rd Edition or noted Revision year.
- 3) Test Methods for Evaluating Solid Waste SW 846 3rd Edition including updates IVA and IVB
- 4) Hach Water Analysis Handbook, 4th edition, 1992



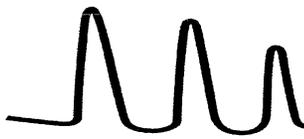
# LABORATORY REPORT

EAI ID#: 195703

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

| Sample ID:                    | SB-8 (3-4.5) | SB-9 (3-4.5) | SB-10 (3-4.5) |
|-------------------------------|--------------|--------------|---------------|
| Lab Sample ID:                | 195703.05    | 195703.06    | 195703.07     |
| Matrix:                       | soil         | soil         | soil          |
| Date Sampled:                 | 5/21/19      | 5/21/19      | 5/21/19       |
| Date Received:                | 5/21/19      | 5/21/19      | 5/21/19       |
| Units:                        | mg/kg        | mg/kg        | mg/kg         |
| Date of Analysis:             | 5/31/19      | 5/31/19      | 5/31/19       |
| Analyst:                      | VG           | VG           | VG            |
| Method:                       | 8260C        | 8260C        | 8260C         |
| Dilution Factor:              | 1            | 1            | 1             |
| Tetrachloroethene             | < 0.05       | 2.5          | 0.099         |
| 4-Bromofluorobenzene (surr)   | 98 %R        | 97 %R        | 97 %R         |
| 1,2-Dichlorobenzene-d4 (surr) | 98 %R        | 96 %R        | 99 %R         |
| Toluene-d8 (surr)             | 96 %R        | 97 %R        | 95 %R         |
| 1,2-Dichloroethane-d4 (surr)  | 86 %R        | 86 %R        | 85 %R         |



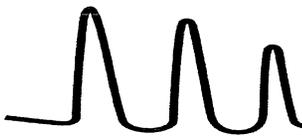
# QC REPORT

EAI ID#: 195703

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Client Designation: Merchant's Row | 58341.00

| Parameter Name               | Blank  | LCS          | LCSD                  | Analysis Date | Units | Limits   | RPD | Method |
|------------------------------|--------|--------------|-----------------------|---------------|-------|----------|-----|--------|
| Dichlorodifluoromethane      | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Chloromethane                | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Vinyl chloride               | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Bromomethane                 | < 0.2  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Chloroethane                 | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Trichlorofluoromethane       | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Diethyl Ether                | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Acetone                      | < 2    |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,1-Dichloroethene           | < 0.05 | 1.1 (113 %R) | 1.3 (128 %R) (13 RPD) | 5/30/2019     | mg/kg | 59 - 172 | 20  | 8260C  |
| tert-Butyl Alcohol (TBA)     | < 2    |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Methylene chloride           | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Carbon disulfide             | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Methyl-t-butyl ether(MTBE)   | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Ethyl-t-butyl ether(ETBE)    | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Isopropyl ether(DIPE)        | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| tert-amyl methyl ether(TAME) | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| trans-1,2-Dichloroethene     | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,1-Dichloroethane           | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 2,2-Dichloropropane          | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| cis-1,2-Dichloroethene       | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 2-Butanone(MEK)              | < 0.5  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Bromochloromethane           | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Tetrahydrofuran(THF)         | < 0.5  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Chloroform                   | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,1,1-Trichloroethane        | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Carbon tetrachloride         | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,1-Dichloropropene          | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Benzene                      | < 0.05 | 1.0 (102 %R) | 1.1 (115 %R) (12 RPD) | 5/30/2019     | mg/kg | 66 - 142 | 20  | 8260C  |
| 1,2-Dichloroethane           | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Trichloroethene              | < 0.05 | 1.0 (104 %R) | 1.2 (118 %R) (13 RPD) | 5/30/2019     | mg/kg | 62 - 137 | 20  | 8260C  |
| 1,2-Dichloropropane          | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Dibromomethane               | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Bromodichloromethane         | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,4-Dioxane                  | < 3    |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 4-Methyl-2-pentanone(MIBK)   | < 0.5  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| cis-1,3-Dichloropropene      | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Toluene                      | < 0.05 | 1.0 (101 %R) | 1.1 (115 %R) (13 RPD) | 5/30/2019     | mg/kg | 59 - 139 | 20  | 8260C  |
| trans-1,3-Dichloropropene    | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,1,2-Trichloroethane        | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 2-Hexanone                   | < 0.1  |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Tetrachloroethene            | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,3-Dichloropropane          | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Dibromochloromethane         | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,2-Dibromoethane(EDB)       | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Chlorobenzene                | < 0.05 | 1.0 (101 %R) | 1.1 (114 %R) (13 RPD) | 5/30/2019     | mg/kg | 60 - 133 | 20  | 8260C  |
| 1,1,1,2-Tetrachloroethane    | < 0.05 |              |                       | 5/30/2019     | mg/kg |          |     | 8260C  |



# QC REPORT

EAI ID#: 195703

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

| Parameter Name                | Blank  | LCS   | LCSD  | Analysis Date | Units | Limits   | RPD | Method |
|-------------------------------|--------|-------|-------|---------------|-------|----------|-----|--------|
| Ethylbenzene                  | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| mp-Xylene                     | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| o-Xylene                      | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Styrene                       | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Bromoform                     | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| IsoPropylbenzene              | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Bromobenzene                  | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,1,2,2-Tetrachloroethane     | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,2,3-Trichloropropane        | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| n-Propylbenzene               | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 2-Chlorotoluene               | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 4-Chlorotoluene               | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,3,5-Trimethylbenzene        | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| tert-Butylbenzene             | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,2,4-Trimethylbenzene        | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| sec-Butylbenzene              | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,3-Dichlorobenzene           | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| p-Isopropyltoluene            | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,4-Dichlorobenzene           | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,2-Dichlorobenzene           | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| n-Butylbenzene                | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,2-Dibromo-3-chloropropane   | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,3,5-Trichlorobenzene        | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,2,4-Trichlorobenzene        | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Hexachlorobutadiene           | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| Naphthalene                   | < 0.1  |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 1,2,3-Trichlorobenzene        | < 0.05 |       |       | 5/30/2019     | mg/kg |          |     | 8260C  |
| 4-Bromofluorobenzene (surr)   | 98 %R  | 96 %R | 98 %R | 5/30/2019     | % Rec | 70 - 130 | 20  | 8260C  |
| 1,2-Dichlorobenzene-d4 (surr) | 97 %R  | 95 %R | 96 %R | 5/30/2019     | % Rec | 70 - 130 | 20  | 8260C  |
| Toluene-d8 (surr)             | 97 %R  | 95 %R | 97 %R | 5/30/2019     | % Rec | 70 - 130 | 20  | 8260C  |
| 1,2-Dichloroethane-d4 (surr)  | 86 %R  | 87 %R | 88 %R | 5/30/2019     | % Rec | 70 - 130 | 20  | 8260C  |

Samples were extracted and analyzed within holding time limits.

Instrumentation was calibrated in accordance with the method requirements.

The method blanks were free of contamination at the reporting limits.

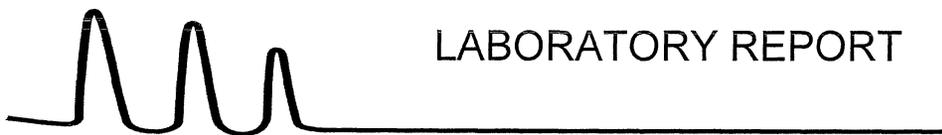
Sample surrogate recoveries met the above stated criteria.

The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria.

There were no exceptions in the analyses, unless noted.

\*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.

Analytes that exceed limits high but are not detected in the field samples do not impact the data. For analytes that show low recovery and are not detected in the field samples, a low point calibration standard has been analyzed to support the reporting limit.



# LABORATORY REPORT

EAI ID#: 195703

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**

Client Designation: **Merchant's Row | 58341.00**

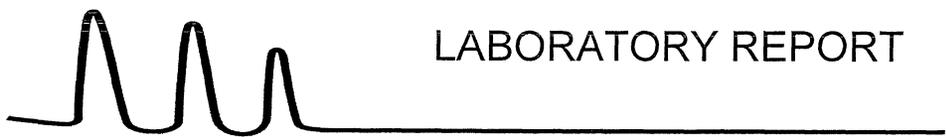
**Client Sample ID:** SB-1 (0.5-1.5)  
**Lab Sample ID:** 195703.01  
**Matrix:** soil  
**Date Sampled:** 5/21/19  
**Date Received:** 5/21/19  
**Date Prepared:** 5/23/19  
**Units:** mg/kg  
**Method:** 8270D  
**Analyst:** JMR

|                        | Results | Dilution Factor | Date Analyzed | TEF   | TEQ   |
|------------------------|---------|-----------------|---------------|-------|-------|
| Naphthalene            | 0.090   | 1               | 5/23/19       |       |       |
| 2-Methylnaphthalene    | 0.085   | 1               | 5/23/19       |       |       |
| 1-Methylnaphthalene    | 0.097   | 1               | 5/23/19       |       |       |
| Acenaphthylene         | 0.32    | 1               | 5/23/19       |       |       |
| Acenaphthene           | 0.083   | 1               | 5/23/19       |       |       |
| Fluorene               | 0.099   | 1               | 5/23/19       |       |       |
| Phenanthrene           | 1.3     | 1               | 5/23/19       |       |       |
| Anthracene             | 0.33    | 1               | 5/23/19       |       |       |
| Fluoranthene           | 2.4     | 1               | 5/23/19       |       |       |
| Pyrene                 | 2.4     | 1               | 5/23/19       |       |       |
| Benzo[a]anthracene     | 1.4     | 1               | 5/23/19       | 0.1   | .14   |
| Chrysene               | 1.8     | 1               | 5/23/19       | 0.001 | .0018 |
| Benzo[b]fluoranthene   | 1.9     | 1               | 5/23/19       | 0.1   | .19   |
| Benzo[k]fluoranthene   | 0.64    | 1               | 5/23/19       | 0.01  | .0064 |
| Benzo[a]pyrene         | 1.4     | 1               | 5/23/19       | 1     | 1.4   |
| Indeno[1,2,3-cd]pyrene | 1.1     | 1               | 5/23/19       | 0.1   | .11   |
| Dibenz[a,h]anthracene  | 0.28    | 1               | 5/23/19       | 1     | .28   |
| Benzo[g,h,i]perylene   | 0.90    | 1               | 5/23/19       |       |       |
| p-Terphenyl-D14 (surr) | 68 %R   |                 | 5/23/19       |       |       |

TEF: Toxicity Equivalent Factor

TEQ: Toxicity Equivalence to Benzo[a]pyrene

The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.



# LABORATORY REPORT

EAI ID#: 195703

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
Client Designation: **Merchant's Row | 58341.00**

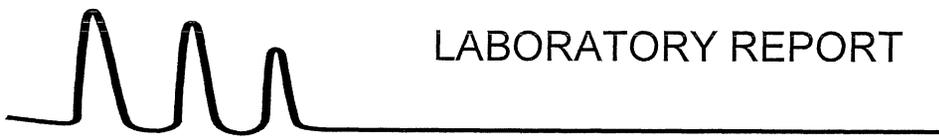
Client Sample ID: SB-8 (3-4.5)  
Lab Sample ID: 195703.05  
Matrix: soil  
Date Sampled: 5/21/19  
Date Received: 5/21/19  
Date Prepared: 5/31/19  
Units: mg/kg  
Method: 8270D  
Analyst: JMR

|                        | Results | Dilution Factor | Date Analyzed | TEF   | TEQ   |
|------------------------|---------|-----------------|---------------|-------|-------|
| Naphthalene            | 0.072   | 1               | 5/31/19       |       |       |
| 2-Methylnaphthalene    | 0.072   | 1               | 5/31/19       |       |       |
| 1-Methylnaphthalene    | 0.069   | 1               | 5/31/19       |       |       |
| Acenaphthylene         | 0.53    | 1               | 5/31/19       |       |       |
| Acenaphthene           | 0.036   | 1               | 5/31/19       |       |       |
| Fluorene               | 0.19    | 1               | 5/31/19       |       |       |
| Phenanthrene           | 1.0     | 1               | 5/31/19       |       |       |
| Anthracene             | 0.28    | 1               | 5/31/19       |       |       |
| Fluoranthene           | 1.9     | 1               | 5/31/19       |       |       |
| Pyrene                 | 1.9     | 1               | 5/31/19       |       |       |
| Benzo[a]anthracene     | 1.1     | 1               | 5/31/19       | 0.1   | .11   |
| Chrysene               | 1.2     | 1               | 5/31/19       | 0.001 | .0012 |
| Benzo[b]fluoranthene   | 1.4     | 1               | 5/31/19       | 0.1   | .14   |
| Benzo[k]fluoranthene   | 0.47    | 1               | 5/31/19       | 0.01  | .0047 |
| Benzo[a]pyrene         | 1.1     | 1               | 5/31/19       | 1     | 1.1   |
| Indeno[1,2,3-cd]pyrene | 0.75    | 1               | 5/31/19       | 0.1   | .075  |
| Dibenz[a,h]anthracene  | 0.20    | 1               | 5/31/19       | 1     | .2    |
| Benzo[g,h,i]perylene   | 0.66    | 1               | 5/31/19       |       |       |
| p-Terphenyl-D14 (surr) | 63 %R   |                 | 5/31/19       |       |       |

TEF: Toxicity Equivalent Factor

TEQ: Toxicity Equivalence to Benzo[a]pyrene

The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.



# LABORATORY REPORT

EAI ID#: 195703

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
Client Designation: **Merchant's Row | 58341.00**

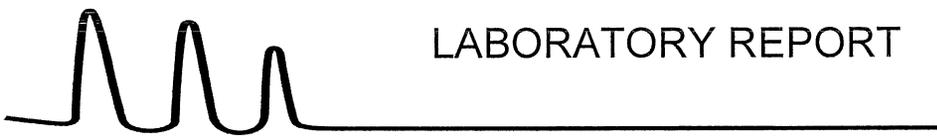
Client Sample ID: SB-9 (3-4.5)  
Lab Sample ID: 195703.06  
Matrix: soil  
Date Sampled: 5/21/19  
Date Received: 5/21/19  
Date Prepared: 5/31/19  
Units: mg/kg  
Method: 8270D  
Analyst: JMR

|                        | Results | Dilution Factor | Date Analyzed | TEF   | TEQ  |
|------------------------|---------|-----------------|---------------|-------|------|
| Naphthalene            | 0.53    | 11              | 6/3/19        |       |      |
| 2-Methylnaphthalene    | 0.25    | 11              | 6/3/19        |       |      |
| 1-Methylnaphthalene    | 0.30    | 11              | 6/3/19        |       |      |
| Acenaphthylene         | 1.7     | 11              | 6/3/19        |       |      |
| Acenaphthene           | 0.43    | 11              | 6/3/19        |       |      |
| Fluorene               | 1.1     | 11              | 6/3/19        |       |      |
| Phenanthrene           | 20      | 11              | 6/3/19        |       |      |
| Anthracene             | 3.6     | 11              | 6/3/19        |       |      |
| Fluoranthene           | 33      | 11              | 6/3/19        |       |      |
| Pyrene                 | 33      | 11              | 6/3/19        |       |      |
| Benzo[a]anthracene     | 15      | 11              | 6/3/19        | 0.1   | 1.5  |
| Chrysene               | 18      | 11              | 6/3/19        | 0.001 | .018 |
| Benzo[b]fluoranthene   | 17      | 11              | 6/3/19        | 0.1   | 1.7  |
| Benzo[k]fluoranthene   | 5.6     | 11              | 6/3/19        | 0.01  | .056 |
| Benzo[a]pyrene         | 14      | 11              | 6/3/19        | 1     | 14   |
| Indeno[1,2,3-cd]pyrene | 11      | 11              | 6/3/19        | 0.1   | 1.1  |
| Dibenz[a,h]anthracene  | 2.3     | 11              | 6/3/19        | 1     | 2.3  |
| Benzo[g,h,i]perylene   | 10      | 11              | 6/3/19        |       |      |
| p-Terphenyl-D14 (surr) | 70 %R   |                 | 6/3/19        |       |      |

TEF: Toxicity Equivalent Factor

TEQ: Toxicity Equivalence to Benzo[a]pyrene

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# LABORATORY REPORT

EAI ID#: 195703

Client: **Vanasse Hangen Brustlin, Inc. (VHB)**  
 Client Designation: **Merchant's Row | 58341.00**

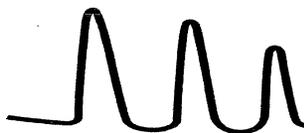
Client Sample ID: SB-10 (3-4.5)  
 Lab Sample ID: 195703.07  
 Matrix: soil  
 Date Sampled: 5/21/19  
 Date Received: 5/21/19  
 Date Prepared: 5/31/19  
 Units: mg/kg  
 Method: 8270D  
 Analyst: JMR

|                        | Results       | Dilution Factor | Date Analyzed | TEF   | TEQ     |
|------------------------|---------------|-----------------|---------------|-------|---------|
| Naphthalene            | < 0.007       | 1               | 5/31/19       |       |         |
| 2-Methylnaphthalene    | < 0.007       | 1               | 5/31/19       |       |         |
| 1-Methylnaphthalene    | < 0.007       | 1               | 5/31/19       |       |         |
| Acenaphthylene         | <b>0.024</b>  | 1               | 5/31/19       |       |         |
| Acenaphthene           | < 0.007       | 1               | 5/31/19       |       |         |
| Fluorene               | < 0.007       | 1               | 5/31/19       |       |         |
| Phenanthrene           | <b>0.028</b>  | 1               | 5/31/19       |       |         |
| Anthracene             | <b>0.0074</b> | 1               | 5/31/19       |       |         |
| Fluoranthene           | <b>0.048</b>  | 1               | 5/31/19       |       |         |
| Pyrene                 | <b>0.049</b>  | 1               | 5/31/19       |       |         |
| Benzo[a]anthracene     | <b>0.039</b>  | 1               | 5/31/19       | 0.1   | .0039   |
| Chrysene               | <b>0.042</b>  | 1               | 5/31/19       | 0.001 | .000042 |
| Benzo[b]fluoranthene   | <b>0.039</b>  | 1               | 5/31/19       | 0.1   | .0039   |
| Benzo[k]fluoranthene   | <b>0.013</b>  | 1               | 5/31/19       | 0.01  | .00013  |
| Benzo[a]pyrene         | <b>0.029</b>  | 1               | 5/31/19       | 1     | .029    |
| Indeno[1,2,3-cd]pyrene | <b>0.013</b>  | 1               | 5/31/19       | 0.1   | .0013   |
| Dibenz[a,h]anthracene  | < 0.007       | 1               | 5/31/19       | 1     | < .007  |
| Benzo[g,h,i]perylene   | <b>0.010</b>  | 1               | 5/31/19       |       |         |
| p-Terphenyl-D14 (surr) | <b>63 %R</b>  |                 | 5/31/19       |       |         |

TEF: Toxicity Equivalent Factor

TEQ: Toxicity Equivalence to Benzo[a]pyrene

The TEF factors set forth in this report are taken from the following EPA document: "Mid- Atlantic Risk Assessment User's Guide: November 2013". This guidance document sets forth a recommended, but not mandatory approach based upon currently available information with respect to risk assessment for response actions at CERCLA sites. This document does not establish binding rules. This document contains the most current TEF values per VT IROCP.



# QC REPORT

EAI ID#: 195703

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Batch ID: 636941-98748/S052319PAH1

Client Designation: Merchant's Row | 58341.00

| Parameter Name         | Blank   | LCS         | LCSD                | Analysis Date | Units | Limits   | RPD | Method |
|------------------------|---------|-------------|---------------------|---------------|-------|----------|-----|--------|
| Naphthalene            | < 0.007 | 1.1 (69 %R) | 1.1 (68 %R) (2 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2-Methylnaphthalene    | < 0.007 | 1.3 (79 %R) | 1.3 (76 %R) (4 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 1-Methylnaphthalene    | < 0.007 | 1.3 (78 %R) | 1.2 (74 %R) (5 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acenaphthylene         | < 0.007 | 1.1 (69 %R) | 1.1 (68 %R) (2 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acenaphthene           | < 0.007 | 1.1 (63 %R) | 1.0 (62 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Fluorene               | < 0.007 | 1.2 (70 %R) | 1.2 (70 %R) (1 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Phenanthrene           | < 0.007 | 1.2 (74 %R) | 1.2 (73 %R) (1 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Anthracene             | < 0.007 | 1.3 (75 %R) | 1.2 (75 %R) (1 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Fluoranthene           | < 0.007 | 1.3 (76 %R) | 1.3 (76 %R) (0 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Pyrene                 | < 0.007 | 1.5 (87 %R) | 1.4 (83 %R) (5 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[a]anthracene     | < 0.007 | 1.4 (83 %R) | 1.3 (81 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Chrysene               | < 0.007 | 1.4 (86 %R) | 1.4 (84 %R) (2 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[b]fluoranthene   | < 0.007 | 1.4 (82 %R) | 1.3 (79 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[k]fluoranthene   | < 0.007 | 1.4 (83 %R) | 1.3 (80 %R) (4 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[a]pyrene         | < 0.007 | 1.3 (81 %R) | 1.3 (78 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Indeno[1,2,3-cd]pyrene | < 0.007 | 1.4 (83 %R) | 1.3 (78 %R) (6 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Dibenz[a,h]anthracene  | < 0.007 | 1.4 (83 %R) | 1.3 (81 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[g,h,i]perylene   | < 0.007 | 1.4 (81 %R) | 1.3 (78 %R) (3 RPD) | 5/23/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| p-Terphenyl-D14 (surr) | 71 %R   | 84 %R       | 82 %R               | 5/23/2019     | mg/kg | 30 - 130 |     | 8270D  |

Samples were extracted and analyzed within holding time limits.

Instrumentation was calibrated in accordance with the method requirements.

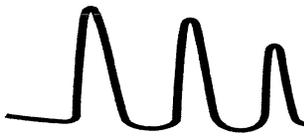
The method blanks were free of contamination at the reporting limits.

Sample surrogate recoveries met the above stated criteria.

The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria.

There were no exceptions in the analyses, unless noted.

\*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.



# QC REPORT

EAI ID#: 195703

Client: Vanasse Hangen Brustlin, Inc. (VHB)

Batch ID: 636948-85821/S053119PAH1

Client Designation: Merchant's Row | 58341.00

| Parameter Name         | Blank   | LCS         | LCSD                 | Analysis Date | Units | Limits   | RPD | Method |
|------------------------|---------|-------------|----------------------|---------------|-------|----------|-----|--------|
| Naphthalene            | < 0.007 | 1.3 (81 %R) | 1.4 (82 %R) (2 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 2-Methylnaphthalene    | < 0.007 | 1.5 (90 %R) | 1.5 (91 %R) (1 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| 1-Methylnaphthalene    | < 0.007 | 1.5 (89 %R) | 1.5 (89 %R) (0 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acenaphthylene         | < 0.007 | 1.3 (79 %R) | 1.3 (79 %R) (0 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Acenaphthene           | < 0.007 | 1.2 (72 %R) | 1.2 (72 %R) (0 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Fluorene               | < 0.007 | 1.4 (81 %R) | 1.3 (77 %R) (6 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Phenanthrene           | < 0.007 | 1.4 (86 %R) | 1.4 (83 %R) (4 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Anthracene             | < 0.007 | 1.4 (86 %R) | 1.4 (81 %R) (5 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Fluoranthene           | < 0.007 | 1.4 (86 %R) | 1.3 (78 %R) (10 RPD) | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Pyrene                 | < 0.007 | 1.6 (96 %R) | 1.6 (93 %R) (3 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[a]anthracene     | < 0.007 | 1.6 (95 %R) | 1.5 (91 %R) (4 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Chrysene               | < 0.007 | 1.6 (98 %R) | 1.5 (92 %R) (6 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[b]fluoranthene   | < 0.007 | 1.5 (93 %R) | 1.5 (88 %R) (5 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[k]fluoranthene   | < 0.007 | 1.5 (93 %R) | 1.4 (82 %R) (12 RPD) | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[a]pyrene         | < 0.007 | 1.5 (92 %R) | 1.4 (84 %R) (9 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Indeno[1,2,3-cd]pyrene | < 0.007 | 1.4 (86 %R) | 1.4 (86 %R) (0 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Dibenz[a,h]anthracene  | < 0.007 | 1.5 (88 %R) | 1.4 (86 %R) (3 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| Benzo[g,h,i]perylene   | < 0.007 | 1.5 (88 %R) | 1.5 (89 %R) (1 RPD)  | 5/31/2019     | mg/kg | 40 - 140 | 30  | 8270D  |
| p-Terphenyl-D14 (surr) | 92 %R   | 100 %R      | 88 %R                | 5/31/2019     | mg/kg | 30 - 130 |     | 8270D  |

Samples were extracted and analyzed within holding time limits.

Instrumentation was calibrated in accordance with the method requirements.

The method blanks were free of contamination at the reporting limits.

Sample surrogate recoveries met the above stated criteria.

The associated matrix spikes and/or Laboratory Control Samples met acceptance criteria.

There were no exceptions in the analyses, unless noted.

\*! Flagged analyte recoveries deviated from the QA/QC limits. Unless noted below, flagged analytes that exceed acceptance limits in the Quality Control sample were not detected in the field samples.





April 17, 2019

Ref: 58341.00

Janet E. Shatney  
Director of Planning, Permitting & Assessing Services  
City of Barre  
City Hall  
6 North Main Street, Suite 7  
Barre, Vermont 05641

**Re: Work Plan for Soil Characterization Assessment  
Merchant's Row Redevelopment Project  
City of Barre, Vermont**

Dear Janet:

On behalf of The City of Barre (TheCity), VHB has prepared this Work Plan for Soil Characterization Assessment (the Work Plan) for the Merchant's Row Redevelopment Project (the Project) located in the City of Barre, Vermont. The Project area relative to its surroundings is shown on **Figure 1**. This proposed soil characterization assessment will be performed to address gaps in the existing soil data for areas that will potentially be disturbed during the Project. The purpose of this Work Plan is to describe the procedures for soil characterization that will be used to obtain the data necessary for making informed soil management decisions.

### **1.0 BACKGROUND**

Numerous environmental investigations have been performed at Sites adjacent to the Project area and one of these investigations extending onto the Project area. In 2012, Nobis Engineering, Inc. (Nobis) conducted a Targeted Brownfields Assessment Phase II Investigation which included characterization of a large portion of soil in the Project area. Spatially representative soil samples were collected in a grid pattern and analyzed for almost all the environmental contaminants that are typically identified in urban soils. Considering these data are relatively recent and reportedly incorporate appropriate sampling and quality control protocol, they will be used to guide and supplement the data that will be generated during this proposed soil characterization assessment. Once the data generated during the 2012 Nobis investigation is combined with the additional soil data proposed in this Work Plan, the resulting data set can be used to plan potential soil management options and associated costs for general planning purposes. As discussed below, the supplemental field investigation being proposed will not determine the full nature and extent of potential impacts to soil, nor will it entirely satisfy the pre-approval requirements for all soil that may be proposed for offsite disposal at a certified landfill.



A summary of the existing soil data from the 2012 Nobis investigation is described below and is presented in **Figure 2**. As shown, soil samples were collected from the north end of the Project area to a depth of 2 feet below ground surface (fbgs) and in the middle and south end of the Project area to a depth of 3 fbgs and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), herbicides and metals. Results are listed below:

- No PCB detections.
- No herbicides detected above Vermont's applicable screening criterion.
- No metals detected above Vermont's applicable screening criterion.
- VOC soil results were below screening criterion except for one sample that reported tetrachloroethylene (PCE) at a concentration above the residential Vermont Screening Level (VSL) at the south end of the Project area near the Bonacorsi & Sons Property. This elevated PCE detection was expected considering the known extents of soil, soil vapor, and groundwater PCE contamination associated with the former dry-cleaning operation at the Bonacorsi & Sons Property.
- SVOC soil results were below screening criteria with the exception of polycyclic aromatic hydrocarbons (PAHs, a sub-set of SVOCs) which exceeded the Vermont Department of Environmental Conservation (VTDEC) Urban Background Soil Concentration in approximately one-third of the samples analyzed. Because this Project area is located in an "Urban Area" as mapped by the Vermont Agency of Natural Resources (VTANR) Natural Resources Atlas map, the resulting benzo[a]pyrene (BaP) toxic equivalent quotient (TEQ) value is compared to the VTDEC Urban Background Soil Concentration and not the residential VSL. PAHs and BaP TEQ, a subset of PAHs, are a by-product of the combustion of hydrocarbons and are therefore contaminants commonly associated with urban areas, historical fill, and railroad operations, all of which are present at the Project area. **Figure 2** also shows the former location of the Stevens Branch riverbed, an area which was filled with soil of unknown quality or origin, after the course of the river changed.

In addition to a review of the 2012 Nobis investigation results, VHB prepared an Area Wide Assessment Addendum (AWA Addendum, dated March 26, 2019) to Stone Environmental, Inc.'s Area Wide Assessment dated September 30, 2011 (AWA) for the Project. As of April 17, 2019, the AWA Addendum is currently under review by the City of Barre and has not yet been submitted to VTDEC. The purpose of the AWA Addendum was to review the environmental hazardous site investigation information related to State listed sites near the Project area and to evaluate how this new information could impact the data gaps, conclusions and recommendations in the 2011 AWA report. VHB used the information obtained from review of the 2011 AWA and preparation of the AWA Addendum to assist in the placement of sample locations and analyses that are proposed in this Work Plan.

### **1.1 Recommendations for Soil Characterization Assessment**

VHB recommends employing a focused investigation approach that obtains additional soil data to supplement the existing 2012 Nobis data set, as well as take into consideration the information identified in VHB's 2019 AWA Addendum (currently under review), rather than reinvestigating the entire Project area. Based on the information from previous investigations, VHB recommends additional investigation locations within the Project area where prior data was limited as described below and shown on **Figure 3**:

- Shallow soil stratification (0.5 – 1.5 fbgs) in a specific area within the northern portion of the Project area;
- Shallow soil (0 – 3 fbgs) in a specific area within the central portion of the Project area;



- Deeper soil (3 – 4.5 fbgs) in an area within the southern portion of the Project area, the area located adjacent to the rail road and within 250 feet of Prospect Street; and,
- Project-wide shallow and deeper soil for specific parameters not previously analyzed.

Again, this supplemental soil assessment is designed to fill some of the data gaps in the 2012 Nobis soil assessment but will not determine the full nature and extent of potential impacts to soil. The data generated from this supplemental assessment coupled with the 2012 Nobis data can be used to determine potential soil management options and support preliminary budgets for project planning purposes.

#### **Shallow soil stratification (north end)**

At two (2) locations in the north end of the Project area, results from the 2012 soil investigation identified soil with elevated BaP-TEQ concentrations that exceeded the industrial VSLs in the surface soil at depths of 0 - 0.5 fbgs; however, the shallow soil at these locations at depths of 1.5 – 2 fbgs had BaP-TEQ levels below the VTDEC Urban Background Soil Concentration. Soil management costs associated with these two types of soil vary considerably; therefore, it is cost beneficial for the City to determine the depth of the PAH-contaminated soil in this area, rather than assuming the contaminated soil extends to 1.5 fbgs. It is likely that this PAH-contaminated soil in the top 6-inches is associated with a “black ash material” below the asphalt that was described in the soil boring logs. Vertical delineation of these PAH impacts within the 0-1.5 fbgs interval could potentially reduce soil management and disposal costs.

#### **Shallow soil (center)**

The shallow soil in the center of the Project area that was not included in the 2012 Nobis investigation should be analyzed for PAHs to close this data gap. Since the previous data indicates that other analytes (VOCs, non-PAH SVOCs, PCBs, metals and herbicides) across the Project area are not present at levels of concern, these analyses are not necessary.

#### **Deeper soil (south end)**

The deeper soil (3 – 4.5 fbgs interval) in the south end of the Project area was not previously investigated and therefore this stratum must be pre-characterized.

#### **Project-wide**

In addition to investigating the specific locations described above, VHB recommends investigating soils across the Project area for specific parameters which can have a significant impact on soil management strategies due to their cost implications, as follows:

- Based on the 2012 soil PAH results, BaP is present in some samples at concentrations exceeding the VTDEC Urban Background Soil Concentration and industrial VSL. To potentially relocate and reuse this soil onsite, which could avoid expensive soil disposal costs, VTDEC requires evidence that this soil will not impact groundwater. Based on our experience at other Vermont sites, a synthetic precipitation leaching procedure (SPLP) analysis can be performed and is a low-cost alternative to installing and sampling groundwater monitoring wells; this approach is also acceptable to VTDEC. The SPLP simulates the potential for contaminants in soil to mobilize when exposed to precipitation infiltrate and generates the resulting aqueous concentration of the analyzed contaminants. Results of the SPLP analysis can be compared to Vermont Groundwater Enforcement Standards (VGES).



- Based on the 2012 soil metals results, lead concentrations are below the residential VSL (400 mg/kg); however, lead concentrations at several locations exceeded the threshold that triggers toxicity characteristic leaching procedure (TCLP) analysis for certified landfills (100 mg/kg). Landfills require this analysis to confirm their liquid leachate generated by these soils will not exceed hazardous levels. An exceedance of the TCLP for lead could have a significant impact on soil disposal costs for material required to be transported and disposed offsite.
- Pesticides were not evaluated during the 2012 investigation and may potentially be present; this will be viewed as a data gap from a waste disposal perspective.

## 2.0 SCOPE OF WORK

This soil characterization assessment will establish a data set that when combined with the data generated during the 2012 Nobis investigation can be used to develop appropriate soil management strategies that may include disposal at Casella-owned landfills, relocation and reuse off-site, and/or on-site reuse of the soil. Additional analyses outside of this Scope of Work may be necessary for pre-disposal waste characterization of soil that is actually representative of the specific waste stream; however, it is VHB's experience that Casella-owned landfills may accept a reduced sample quantity for pre-approval when a robust data set such as this already exists.

VHB anticipates one (1) day of drilling will be required to advance soil borings and collect soil samples from the locations and depth intervals that are representative of soils that would likely be disturbed during the Project, and where prior data was limited.

### 2.1 Preparatory Tasks

After receiving authorization from the City, VHB will forward this Work Plan to the VTDEC for review and approval. Following approval of the Work Plan by the City and VTDEC, VHB will coordinate the work with the subcontracted driller and laboratory. Prior to drilling, VHB will contact Dig Safe and public works officials to obtain utility clearance.

### 2.2 Soil Borings

Ten (10) soil borings will be advanced to collect soil samples from within the Project area at locations and depths that were not previously characterized during the 2012 Nobis investigation and that would likely be disturbed during the Project (see Section 1.1). Soil borings will be advanced at three (3) locations in the Project area: the north end of the Project area to characterize soil from 0.5 - 1.5 fbgs; the central portion of the Project area to characterize soil from 0 - 3 fbgs; and the south end of the Project area to characterize soil from 3 - 4.5 fbgs. Proposed soil boring locations, and proposed sample depth intervals are shown on **Figure 3**.

Two (2) out of the ten (10) soil borings will be advanced at the north end of the Project area to termination depths of 1.5 fbgs and soil samples representing the previously uncharacterized soil located just below the "black ash material" identified below the asphalt and described in the 2012 Nobis soil boring logs will be collected. Two (2) out of the ten (10) soil borings will be advanced near the center of the Project area to termination depths of 3 fbgs and the remaining six (6) out of the ten (10) soil borings will be advanced at the south end of the Project area to termination depths of 4.5 fbgs.



Soil borings will be advanced using a Geoprobe direct-push drill rig and continuous soil cores will be collected in dedicated butyrate liners. The exterior diameter of the boring equipment will be 3 inches and the soil cores will be collected in 5-foot intervals or less, depending on the termination depth of the soil boring. A calibrated photoionization detector (PID) will be used to field screen the soils extracted during soil boring advancement and visual/olfactory/geologic observations will be recorded on dedicated soil boring logs. To PID field screen the soil, a decontaminated stainless-steel tool will be used to make a small space in the soil core and the PID probe will be immediately inserted into the void. Immediately after PID screening, the appropriate sample containers will be filled (see Section 2.3), starting with the container for VOCs. After sampling, any remaining soil will be returned to the bore hole and the remaining void will be backfilled with driller's sand. Surface completions of soil borings advanced through hardscape or softscape features (e.g.: concrete, asphalt, or soil) will be repaired using similar material (e.g.: concrete, asphalt cold-patch, or soil). All soil boring locations will be measured with VHB's Trimble GPS and presented on a sample location figure in the investigation report.

### 2.3 Soil Sampling

VHB understands that the objectives of this soil characterization assessment are to: 1) evaluate whether or not shallow soils present a risk of exposure to construction workers and the nearby populace of Barre; and, 2) establish options for management of soils generated during construction. This soil characterization assessment is not intended to establish formal pre-approval from a landfill for soil disposal but is instead intended to generate the necessary environmental soil data that will be used to develop planning budgets for the soil management associated with the Project.

Immediately after PID screening of the soil cores is completed, soil samples will be collected from the depth intervals and locations presented on **Figure 3**. Specifically, soil samples at the north end of the Project area will be collected from the 0.5 - 1.5 fbg depth interval (the upper bound of this interval will be determined by the base of the "black ash material" identified in the soil core). Soil samples near the center of the Project area will be collected from the 0 - 3 fbg depth interval and soil samples from the south end of the Project area will be collected from the 3 - 4.5 fbg depth interval. Discrete samples will be collected from the soil borings advanced at the north end and center of the Project area for laboratory analysis. Discrete samples and composite samples will be collected from the soil borings advanced at the south end of the Project area.

At each of the six (6) sample locations at the south end of the Project area, equal volumes of sample material (with the exception of VOCs) will be placed in a zip-lock bag, homogenized, and two (2) composite samples (three-part) will be created representing the 3 - 4.5 fbg depth interval. Samples for VOCs will also be composited by placing approximately equal volumes of soil from each sub-sample location into the methanol preserved vial, as opposed to introducing it to a zip-lock bag where volatiles could be lost. If soil in a particular location is not homogenous and PID, visual, and/or olfactory evidence of impacts are observed, a discrete sample representing this anomalous condition will be collected and analyzed separately from the composite sample. VHB is assuming that no more than two (2) discrete samples representing anomalous conditions will be collected. The City will be contacted prior to the analysis of these samples because these samples are not included in the existing Work Plan budget.

Following sample collection, all samples will be shipped in an ice-filled cooler under Chain of Custody protocol to Eastern Analytical, Inc. of Concord, New Hampshire (EAI) for laboratory analysis. The two (2) discrete samples collected from the north end of the Project area will be immediately analyzed for PAHs and the two (2) discrete soil samples collected from the center of the Project area will be analyzed for PAHs and lead. One (1) of the four (4) discrete samples collected from the north end and center of the Project area will also be



analyzed for pesticides. The two (2) composite samples will be immediately analyzed for VOCs, SVOCs, RCRA 8 metals, PCBs, and herbicides. One (1) of the two (2) composite samples will also be analyzed for pesticides. Additional material from each of the six (6) sub-samples that were used to create the two (2) composite samples will also be placed "on-hold" at the laboratory pending receipt of the composite analytical results. For any analyte that exceeds the applicable standard from the composite results, the three (3) sub-samples that comprised the composite will then also be analyzed for that particular analyte only, that exceeded the standard. The discrete samples representing anomalous conditions will be placed on-hold for analysis of VOC, SVOC, RCRA8 metals, and PCBs, and the City will be contacted for authorization to analyze these samples.

Additional sample material from each of the two (2) composite samples and all of the discrete samples will be collected and the laboratory will be instructed to place the material "on-hold" for contingency TCLP and SPLP analysis pending receipt of the composite analytical results. Details regarding contingency analysis of the "on-hold" samples for TCLP and SPLP are provided below:

**Contingency analyses:** Analytical results of the two (2) composite samples and the discrete samples will be reviewed to determine if TCLP and/or SPLP analysis are required.

- **TCLP:** If analytes exceed their TCLP Regulatory Level by 20 times, the additional sample material for the sample(s) associated with the exceedance(s) will be analyzed for the respective analyte(s). Based on both VHB's experience reviewing soil analytical results from urban areas in Vermont and VHB's review of the 2012 Nobis investigation results, it is anticipated that lead is the most likely analyte that may exceed its TCLP Regulatory Level by 10 times. Therefore, the two (2) samples with the highest lead concentrations at or above 100 mg/kg will be analyzed for lead via TCLP.
- **SPLP:** As previously mentioned in Section 1.1, the soil PAH results from the 2012 Nobis investigation reported BaP at concentrations exceeding the VTDEC Urban Background Soil Concentration and industrial VSL. Therefore, the two (2) samples with the highest BaP concentrations collected during this proposed soil characterization assessment will be analyzed for BaP via SPLP.

## **2.4 Quality Assurance/Quality Control**

This soil sampling is for pre-characterization purposes. Considering the heterogeneity of soil, no duplicate sampling is proposed. Samples to be analyzed for VOCs will be accompanied by a laboratory-prepared trip blank. Additionally, all coolers containing samples will be packed with ice and equipped with a laboratory-prepared temperature blank. VHB's standard chain of custody protocol will also be employed.

## **2.5 Reporting**

Following completion of all on-site investigation work and receipt of all analytical data, an investigation report will be prepared. Included in this report will be a description of methodology, summaries of sample collection activities, results of field screening, analytical data summary tables, soil boring logs, laboratory analytical reports, Site and area maps, sample collection forms, and field notes. The applicable 2012 Nobis data will also be included in this report. Both the Nobis data and the new VHB data will be compared to the applicable regulatory standards presented in the July 27, 2017 *Investigation and Remediation of Contaminated Properties Rule* (IRule), and presented in tabular, graphical and text forms. The figures will be user-friendly (typically color-coded) and prepared such that the general public can easily interpret what management options are available for soils throughout the Project area. The report will also contain conclusions regarding the nature



and extent of impacted soil that can be ascertained from the analytical data and field observations. Potential soil management strategies will be discussed and preliminary unit costs for soil management will also be provided. This report will be submitted to VTDEC for review.

### **3.0 WORK SCHEDULE SUMMARY**

VHB proposes to perform the field effort described above within 5 weeks of receiving a formal notice to proceed by the City and will request that drilling and analytical invoices be dated prior to June 1, 2019. VHB will have a draft report available for the City to review within 3 weeks of the receipt of analytical results. VHB will strive to accelerate the work schedule to the best of our ability; however, VHB cannot be responsible for schedule delays caused by other entities (regulators, subcontractors, and/or the property owners).

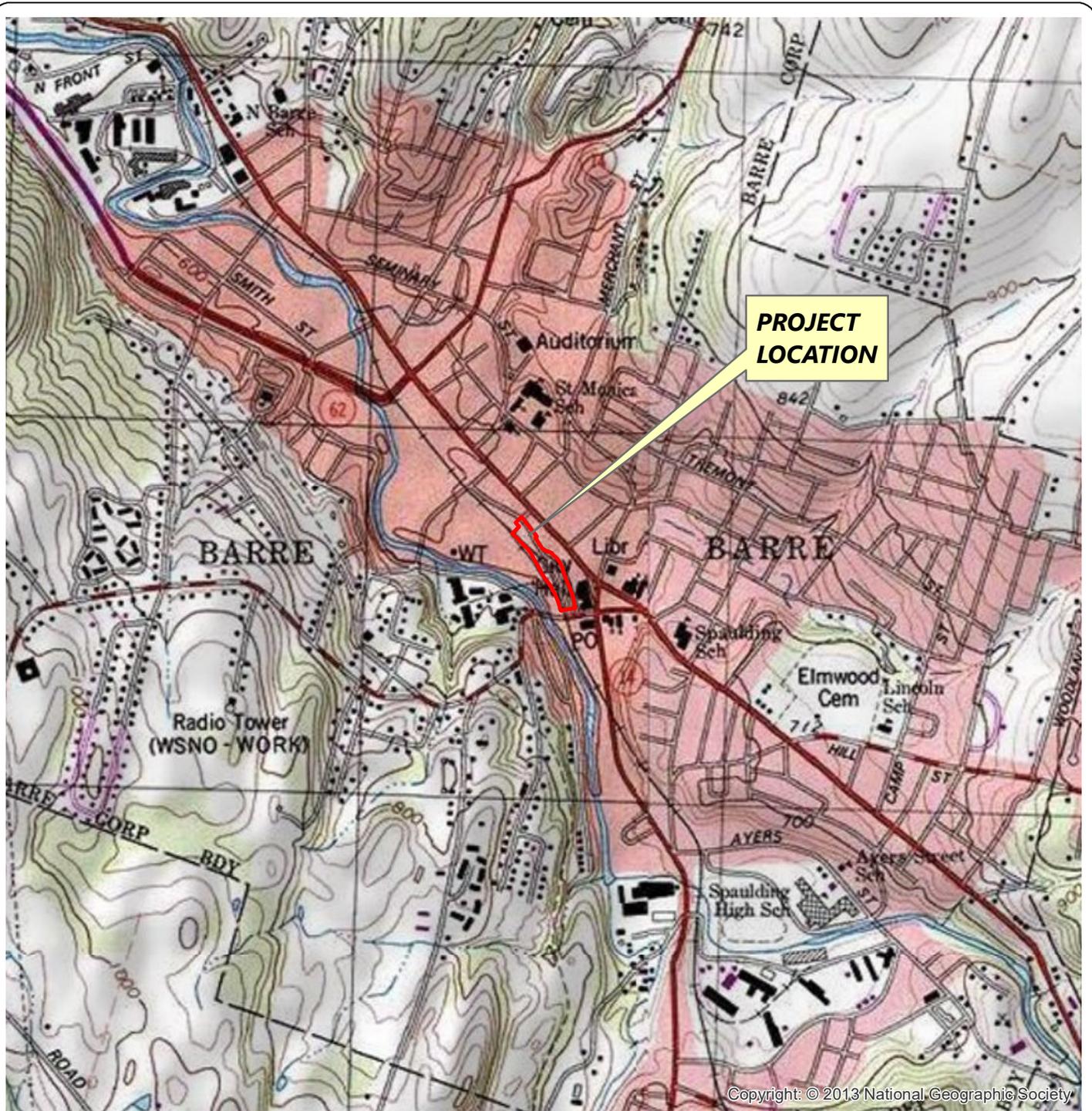
We appreciate the opportunity to present this Work Plan to the City for soil sampling in support of the Merchant's Row Redevelopment Project. We look forward to working with you on this project. Should you have any questions pertaining to this proposal, please feel free to contact me at (802) 778-1278.

Sincerely,

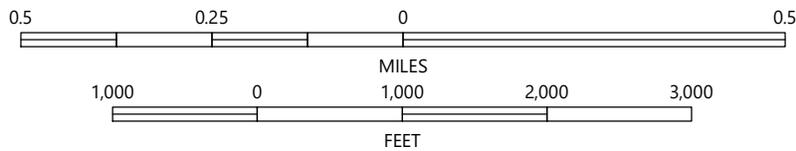


Kurt Muller, P.E.  
Senior Environmental Engineer

Attachments: Figure 1 – Project Location Map  
Figure 2 – Soil Analytical Results from 2012 Nobis Investigation  
Figure 3 - Proposed Soil Boring Locations



Copyright: © 2013 National Geographic Society



CONTOUR INTERVAL: 20 FEET



MAP LOCATION

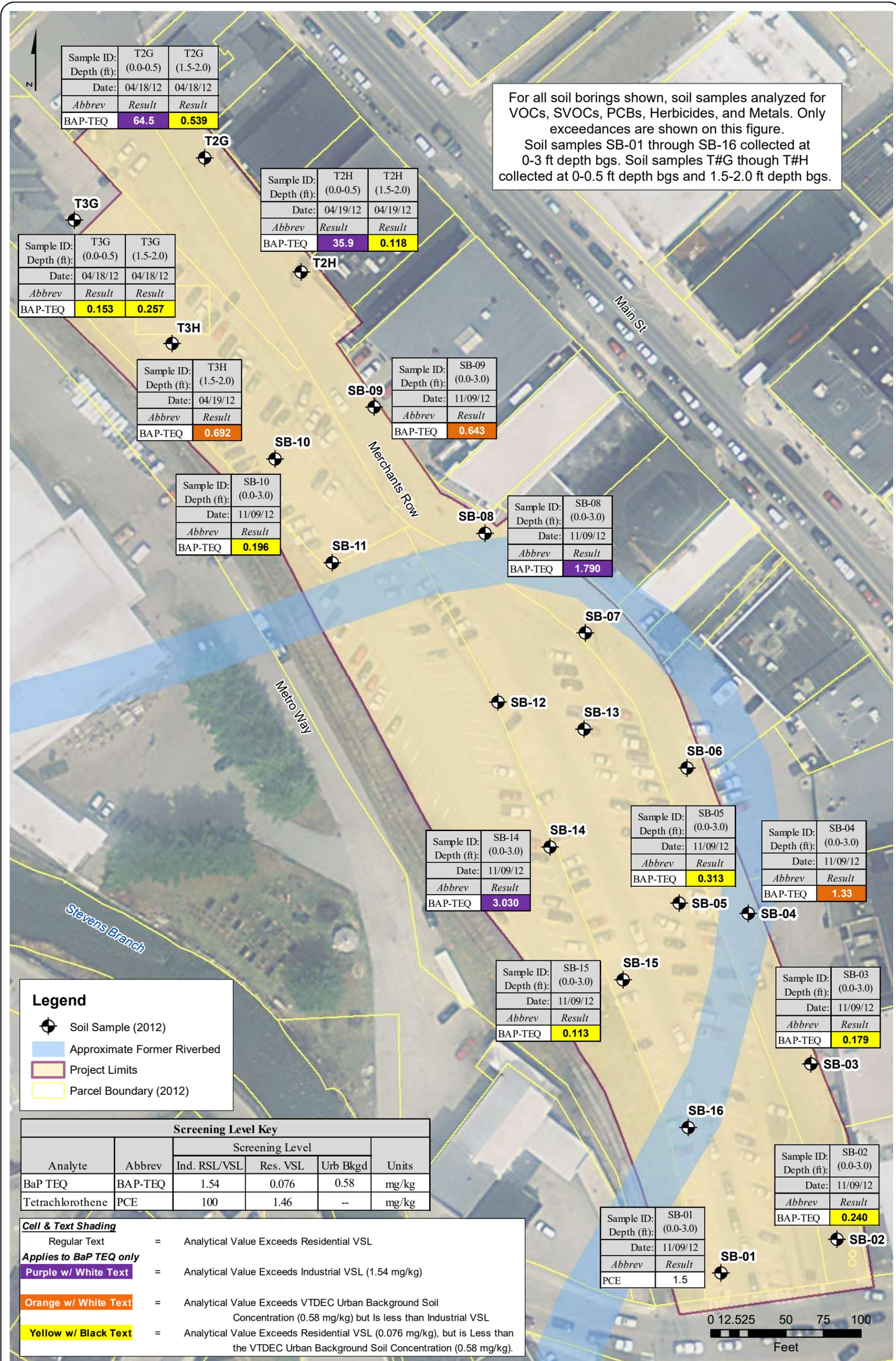
BASE MAP: USGS Seamless iTopo 1:24,000, December 12, 2009

**FIGURE 1: PROJECT LOCATION MAP**  
**MERCHANT'S ROW REHABILITATION PROJECT**  
**BARRE, VERMONT**



40 IDX Drive, Building 100, Suite 200  
 South Burlington, VT 05403

|                 |                   |
|-----------------|-------------------|
| Drawn by: SGH   | Date: 3/28/19     |
| Chk'd by: JKM   | Date: 3/28/19     |
| App'd by: JKM   | Date: 3/28/19     |
| Scale: As Shown | Project: 58341.00 |



**Legend**

- Soil Sample (2012)
- Approximate Former Riverbed
- Project Limits
- Parcel Boundary (2012)

**Screening Level Key**

| Analyte           | Abbrev  | Screening Level |          |          | Units |
|-------------------|---------|-----------------|----------|----------|-------|
|                   |         | Ind. RSL/VSL    | Res. VSL | Urb Bkgd |       |
| BaP TEQ           | BAP-TEQ | 1.54            | 0.076    | 0.58     | mg/kg |
| Tetrachloroethene | PCE     | 100             | 1.46     | --       | mg/kg |

**Cell & Text Shading**

- Regular Text = Analytical Value Exceeds Residential VSL
- Applies to BaP TEQ only**
- Purple w/ White Text** = Analytical Value Exceeds Industrial VSL (1.54 mg/kg)
- Orange w/ White Text** = Analytical Value Exceeds VTDEC Urban Background Soil Concentration (0.58 mg/kg) but is less than Industrial VSL
- Yellow w/ Black Text** = Analytical Value Exceeds Residential VSL (0.076 mg/kg), but is Less than the VTDEC Urban Background Soil Concentration (0.58 mg/kg).

Notes:  
 Ind./Res. = industrial/residential  
 RSL: EPA Regional Screening Level  
 VSL: Vermont Screening Level (IRULE, July 2017)  
 Urb. Bkgd: VTDEC Urban Background Soil Concentration (IRULE, 2017)  
 BaP-TEQ: benzo(a)pyrene toxicity equivalence  
 Sources: Nobis (2012); VCGI (2012).  
 Aerial Imagery from NAIP (2016).

FIGURE 2: SOIL ANALYTICAL RESULTS FROM 2012 NOBIS INVESTIGATION  
 MERCHANT'S ROW REDEVELOPMENT PROJECT  
 BARRE, VERMONT

40 IDX Drive, Building 100, Suite 200  
 South Burlington, VT 05403

Drawn by: DEB Date: 12/10/18  
 Reviewed by: DVR Date: 12/10/18

Scale: 1 in = 60 ft Project: 583414.00

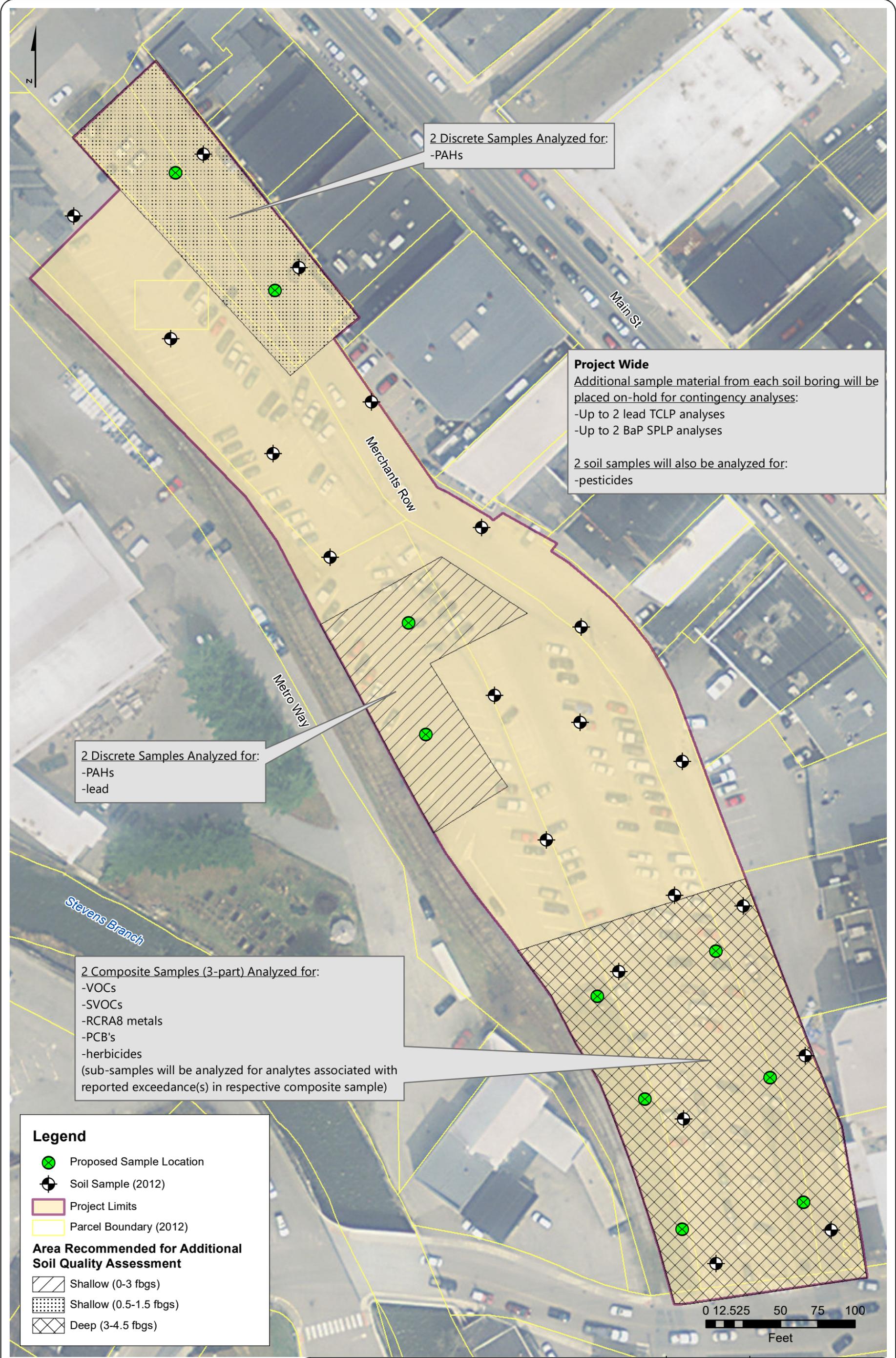


FIGURE 3: PROPOSED SOIL BORING LOCATIONS  
MERCHANT'S ROW REDEVELOPMENT PROJECT  
BARRE, VERMONT



40 IDX Drive, Building 100, Suite 200  
South Burlington, VT 05403

Drawn by: SGH Date: 4/1/19  
Reviewed by: JKM Date: 4/1/19  
Scale: 1 in = 60 ft Project: 583414.00



April 17, 2019

Ref: 58341.00

Janet E. Shatney  
Director of Planning, Permitting & Assessing Services  
City of Barre  
City Hall  
6 North Main Street, Suite 7  
Barre, Vermont 05641

**Re: Work Plan for Soil Characterization Assessment  
Merchant's Row Redevelopment Project  
City of Barre, Vermont**

Dear Janet:

On behalf of The City of Barre (TheCity), VHB has prepared this Work Plan for Soil Characterization Assessment (the Work Plan) for the Merchant's Row Redevelopment Project (the Project) located in the City of Barre, Vermont. The Project area relative to its surroundings is shown on **Figure 1**. This proposed soil characterization assessment will be performed to address gaps in the existing soil data for areas that will potentially be disturbed during the Project. The purpose of this Work Plan is to describe the procedures for soil characterization that will be used to obtain the data necessary for making informed soil management decisions.

### **1.0 BACKGROUND**

Numerous environmental investigations have been performed at Sites adjacent to the Project area and one of these investigations extending onto the Project area. In 2012, Nobis Engineering, Inc. (Nobis) conducted a Targeted Brownfields Assessment Phase II Investigation which included characterization of a large portion of soil in the Project area. Spatially representative soil samples were collected in a grid pattern and analyzed for almost all the environmental contaminants that are typically identified in urban soils. Considering these data are relatively recent and reportedly incorporate appropriate sampling and quality control protocol, they will be used to guide and supplement the data that will be generated during this proposed soil characterization assessment. Once the data generated during the 2012 Nobis investigation is combined with the additional soil data proposed in this Work Plan, the resulting data set can be used to plan potential soil management options and associated costs for general planning purposes. As discussed below, the supplemental field investigation being proposed will not determine the full nature and extent of potential impacts to soil, nor will it entirely satisfy the pre-approval requirements for all soil that may be proposed for offsite disposal at a certified landfill.



A summary of the existing soil data from the 2012 Nobis investigation is described below and is presented in **Figure 2**. As shown, soil samples were collected from the north end of the Project area to a depth of 2 feet below ground surface (fbgs) and in the middle and south end of the Project area to a depth of 3 fbgs and analyzed for volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs), polychlorinated biphenyls (PCBs), herbicides and metals. Results are listed below:

- No PCB detections.
- No herbicides detected above Vermont's applicable screening criterion.
- No metals detected above Vermont's applicable screening criterion.
- VOC soil results were below screening criterion except for one sample that reported tetrachloroethylene (PCE) at a concentration above the residential Vermont Screening Level (VSL) at the south end of the Project area near the Bonacorsi & Sons Property. This elevated PCE detection was expected considering the known extents of soil, soil vapor, and groundwater PCE contamination associated with the former dry-cleaning operation at the Bonacorsi & Sons Property.
- SVOC soil results were below screening criteria with the exception of polycyclic aromatic hydrocarbons (PAHs, a sub-set of SVOCs) which exceeded the Vermont Department of Environmental Conservation (VTDEC) Urban Background Soil Concentration in approximately one-third of the samples analyzed. Because this Project area is located in an "Urban Area" as mapped by the Vermont Agency of Natural Resources (VTANR) Natural Resources Atlas map, the resulting benzo[a]pyrene (BaP) toxic equivalent quotient (TEQ) value is compared to the VTDEC Urban Background Soil Concentration and not the residential VSL. PAHs and BaP TEQ, a subset of PAHs, are a by-product of the combustion of hydrocarbons and are therefore contaminants commonly associated with urban areas, historical fill, and railroad operations, all of which are present at the Project area. **Figure 2** also shows the former location of the Stevens Branch riverbed, an area which was filled with soil of unknown quality or origin, after the course of the river changed.

In addition to a review of the 2012 Nobis investigation results, VHB prepared an Area Wide Assessment Addendum (AWA Addendum, dated March 26, 2019) to Stone Environmental, Inc.'s Area Wide Assessment dated September 30, 2011 (AWA) for the Project. As of April 17, 2019, the AWA Addendum is currently under review by the City of Barre and has not yet been submitted to VTDEC. The purpose of the AWA Addendum was to review the environmental hazardous site investigation information related to State listed sites near the Project area and to evaluate how this new information could impact the data gaps, conclusions and recommendations in the 2011 AWA report. VHB used the information obtained from review of the 2011 AWA and preparation of the AWA Addendum to assist in the placement of sample locations and analyses that are proposed in this Work Plan.

### **1.1 Recommendations for Soil Characterization Assessment**

VHB recommends employing a focused investigation approach that obtains additional soil data to supplement the existing 2012 Nobis data set, as well as take into consideration the information identified in VHB's 2019 AWA Addendum (currently under review), rather than reinvestigating the entire Project area. Based on the information from previous investigations, VHB recommends additional investigation locations within the Project area where prior data was limited as described below and shown on **Figure 3**:

- Shallow soil stratification (0.5 – 1.5 fbgs) in a specific area within the northern portion of the Project area;
- Shallow soil (0 – 3 fbgs) in a specific area within the central portion of the Project area;



- Deeper soil (3 – 4.5 fbgs) in an area within the southern portion of the Project area, the area located adjacent to the rail road and within 250 feet of Prospect Street; and,
- Project-wide shallow and deeper soil for specific parameters not previously analyzed.

Again, this supplemental soil assessment is designed to fill some of the data gaps in the 2012 Nobis soil assessment but will not determine the full nature and extent of potential impacts to soil. The data generated from this supplemental assessment coupled with the 2012 Nobis data can be used to determine potential soil management options and support preliminary budgets for project planning purposes.

#### **Shallow soil stratification (north end)**

At two (2) locations in the north end of the Project area, results from the 2012 soil investigation identified soil with elevated BaP-TEQ concentrations that exceeded the industrial VSLs in the surface soil at depths of 0 - 0.5 fbgs; however, the shallow soil at these locations at depths of 1.5 – 2 fbgs had BaP-TEQ levels below the VTDEC Urban Background Soil Concentration. Soil management costs associated with these two types of soil vary considerably; therefore, it is cost beneficial for the City to determine the depth of the PAH-contaminated soil in this area, rather than assuming the contaminated soil extends to 1.5 fbgs. It is likely that this PAH-contaminated soil in the top 6-inches is associated with a “black ash material” below the asphalt that was described in the soil boring logs. Vertical delineation of these PAH impacts within the 0-1.5 fbgs interval could potentially reduce soil management and disposal costs.

#### **Shallow soil (center)**

The shallow soil in the center of the Project area that was not included in the 2012 Nobis investigation should be analyzed for PAHs to close this data gap. Since the previous data indicates that other analytes (VOCs, non-PAH SVOCs, PCBs, metals and herbicides) across the Project area are not present at levels of concern, these analyses are not necessary.

#### **Deeper soil (south end)**

The deeper soil (3 – 4.5 fbgs interval) in the south end of the Project area was not previously investigated and therefore this stratum must be pre-characterized.

#### **Project-wide**

In addition to investigating the specific locations described above, VHB recommends investigating soils across the Project area for specific parameters which can have a significant impact on soil management strategies due to their cost implications, as follows:

- Based on the 2012 soil PAH results, BaP is present in some samples at concentrations exceeding the VTDEC Urban Background Soil Concentration and industrial VSL. To potentially relocate and reuse this soil onsite, which could avoid expensive soil disposal costs, VTDEC requires evidence that this soil will not impact groundwater. Based on our experience at other Vermont sites, a synthetic precipitation leaching procedure (SPLP) analysis can be performed and is a low-cost alternative to installing and sampling groundwater monitoring wells; this approach is also acceptable to VTDEC. The SPLP simulates the potential for contaminants in soil to mobilize when exposed to precipitation infiltrate and generates the resulting aqueous concentration of the analyzed contaminants. Results of the SPLP analysis can be compared to Vermont Groundwater Enforcement Standards (VGES).



- Based on the 2012 soil metals results, lead concentrations are below the residential VSL (400 mg/kg); however, lead concentrations at several locations exceeded the threshold that triggers toxicity characteristic leaching procedure (TCLP) analysis for certified landfills (100 mg/kg). Landfills require this analysis to confirm their liquid leachate generated by these soils will not exceed hazardous levels. An exceedance of the TCLP for lead could have a significant impact on soil disposal costs for material required to be transported and disposed offsite.
- Pesticides were not evaluated during the 2012 investigation and may potentially be present; this will be viewed as a data gap from a waste disposal perspective.

## 2.0 SCOPE OF WORK

This soil characterization assessment will establish a data set that when combined with the data generated during the 2012 Nobis investigation can be used to develop appropriate soil management strategies that may include disposal at Casella-owned landfills, relocation and reuse off-site, and/or on-site reuse of the soil. Additional analyses outside of this Scope of Work may be necessary for pre-disposal waste characterization of soil that is actually representative of the specific waste stream; however, it is VHB's experience that Casella-owned landfills may accept a reduced sample quantity for pre-approval when a robust data set such as this already exists.

VHB anticipates one (1) day of drilling will be required to advance soil borings and collect soil samples from the locations and depth intervals that are representative of soils that would likely be disturbed during the Project, and where prior data was limited.

### 2.1 Preparatory Tasks

After receiving authorization from the City, VHB will forward this Work Plan to the VTDEC for review and approval. Following approval of the Work Plan by the City and VTDEC, VHB will coordinate the work with the subcontracted driller and laboratory. Prior to drilling, VHB will contact Dig Safe and public works officials to obtain utility clearance.

### 2.2 Soil Borings

Ten (10) soil borings will be advanced to collect soil samples from within the Project area at locations and depths that were not previously characterized during the 2012 Nobis investigation and that would likely be disturbed during the Project (see Section 1.1). Soil borings will be advanced at three (3) locations in the Project area: the north end of the Project area to characterize soil from 0.5 - 1.5 fbgs; the central portion of the Project area to characterize soil from 0 - 3 fbgs; and the south end of the Project area to characterize soil from 3 - 4.5 fbgs. Proposed soil boring locations, and proposed sample depth intervals are shown on **Figure 3**.

Two (2) out of the ten (10) soil borings will be advanced at the north end of the Project area to termination depths of 1.5 fbgs and soil samples representing the previously uncharacterized soil located just below the "black ash material" identified below the asphalt and described in the 2012 Nobis soil boring logs will be collected. Two (2) out of the ten (10) soil borings will be advanced near the center of the Project area to termination depths of 3 fbgs and the remaining six (6) out of the ten (10) soil borings will be advanced at the south end of the Project area to termination depths of 4.5 fbgs.



Soil borings will be advanced using a Geoprobe direct-push drill rig and continuous soil cores will be collected in dedicated butyrate liners. The exterior diameter of the boring equipment will be 3 inches and the soil cores will be collected in 5-foot intervals or less, depending on the termination depth of the soil boring. A calibrated photoionization detector (PID) will be used to field screen the soils extracted during soil boring advancement and visual/olfactory/geologic observations will be recorded on dedicated soil boring logs. To PID field screen the soil, a decontaminated stainless-steel tool will be used to make a small space in the soil core and the PID probe will be immediately inserted into the void. Immediately after PID screening, the appropriate sample containers will be filled (see Section 2.3), starting with the container for VOCs. After sampling, any remaining soil will be returned to the bore hole and the remaining void will be backfilled with driller's sand. Surface completions of soil borings advanced through hardscape or softscape features (e.g.: concrete, asphalt, or soil) will be repaired using similar material (e.g.: concrete, asphalt cold-patch, or soil). All soil boring locations will be measured with VHB's Trimble GPS and presented on a sample location figure in the investigation report.

### 2.3 Soil Sampling

VHB understands that the objectives of this soil characterization assessment are to: 1) evaluate whether or not shallow soils present a risk of exposure to construction workers and the nearby populace of Barre; and, 2) establish options for management of soils generated during construction. This soil characterization assessment is not intended to establish formal pre-approval from a landfill for soil disposal but is instead intended to generate the necessary environmental soil data that will be used to develop planning budgets for the soil management associated with the Project.

Immediately after PID screening of the soil cores is completed, soil samples will be collected from the depth intervals and locations presented on **Figure 3**. Specifically, soil samples at the north end of the Project area will be collected from the 0.5 - 1.5 fbg depth interval (the upper bound of this interval will be determined by the base of the "black ash material" identified in the soil core). Soil samples near the center of the Project area will be collected from the 0 - 3 fbg depth interval and soil samples from the south end of the Project area will be collected from the 3 - 4.5 fbg depth interval. Discrete samples will be collected from the soil borings advanced at the north end and center of the Project area for laboratory analysis. Discrete samples and composite samples will be collected from the soil borings advanced at the south end of the Project area.

At each of the six (6) sample locations at the south end of the Project area, equal volumes of sample material (with the exception of VOCs) will be placed in a zip-lock bag, homogenized, and two (2) composite samples (three-part) will be created representing the 3 - 4.5 fbg depth interval. Samples for VOCs will also be composited by placing approximately equal volumes of soil from each sub-sample location into the methanol preserved vial, as opposed to introducing it to a zip-lock bag where volatiles could be lost. If soil in a particular location is not homogenous and PID, visual, and/or olfactory evidence of impacts are observed, a discrete sample representing this anomalous condition will be collected and analyzed separately from the composite sample. VHB is assuming that no more than two (2) discrete samples representing anomalous conditions will be collected. The City will be contacted prior to the analysis of these samples because these samples are not included in the existing Work Plan budget.

Following sample collection, all samples will be shipped in an ice-filled cooler under Chain of Custody protocol to Eastern Analytical, Inc. of Concord, New Hampshire (EAI) for laboratory analysis. The two (2) discrete samples collected from the north end of the Project area will be immediately analyzed for PAHs and the two (2) discrete soil samples collected from the center of the Project area will be analyzed for PAHs and lead. One (1) of the four (4) discrete samples collected from the north end and center of the Project area will also be



analyzed for pesticides. The two (2) composite samples will be immediately analyzed for VOCs, SVOCs, RCRA 8 metals, PCBs, and herbicides. One (1) of the two (2) composite samples will also be analyzed for pesticides. Additional material from each of the six (6) sub-samples that were used to create the two (2) composite samples will also be placed "on-hold" at the laboratory pending receipt of the composite analytical results. For any analyte that exceeds the applicable standard from the composite results, the three (3) sub-samples that comprised the composite will then also be analyzed for that particular analyte only, that exceeded the standard. The discrete samples representing anomalous conditions will be placed on-hold for analysis of VOC, SVOC, RCRA8 metals, and PCBs, and the City will be contacted for authorization to analyze these samples.

Additional sample material from each of the two (2) composite samples and all of the discrete samples will be collected and the laboratory will be instructed to place the material "on-hold" for contingency TCLP and SPLP analysis pending receipt of the composite analytical results. Details regarding contingency analysis of the "on-hold" samples for TCLP and SPLP are provided below:

**Contingency analyses:** Analytical results of the two (2) composite samples and the discrete samples will be reviewed to determine if TCLP and/or SPLP analysis are required.

- **TCLP:** If analytes exceed their TCLP Regulatory Level by 20 times, the additional sample material for the sample(s) associated with the exceedance(s) will be analyzed for the respective analyte(s). Based on both VHB's experience reviewing soil analytical results from urban areas in Vermont and VHB's review of the 2012 Nobis investigation results, it is anticipated that lead is the most likely analyte that may exceed its TCLP Regulatory Level by 10 times. Therefore, the two (2) samples with the highest lead concentrations at or above 100 mg/kg will be analyzed for lead via TCLP.
- **SPLP:** As previously mentioned in Section 1.1, the soil PAH results from the 2012 Nobis investigation reported BaP at concentrations exceeding the VTDEC Urban Background Soil Concentration and industrial VSL. Therefore, the two (2) samples with the highest BaP concentrations collected during this proposed soil characterization assessment will be analyzed for BaP via SPLP.

## **2.4 Quality Assurance/Quality Control**

This soil sampling is for pre-characterization purposes. Considering the heterogeneity of soil, no duplicate sampling is proposed. Samples to be analyzed for VOCs will be accompanied by a laboratory-prepared trip blank. Additionally, all coolers containing samples will be packed with ice and equipped with a laboratory-prepared temperature blank. VHB's standard chain of custody protocol will also be employed.

## **2.5 Reporting**

Following completion of all on-site investigation work and receipt of all analytical data, an investigation report will be prepared. Included in this report will be a description of methodology, summaries of sample collection activities, results of field screening, analytical data summary tables, soil boring logs, laboratory analytical reports, Site and area maps, sample collection forms, and field notes. The applicable 2012 Nobis data will also be included in this report. Both the Nobis data and the new VHB data will be compared to the applicable regulatory standards presented in the July 27, 2017 *Investigation and Remediation of Contaminated Properties Rule* (IRule), and presented in tabular, graphical and text forms. The figures will be user-friendly (typically color-coded) and prepared such that the general public can easily interpret what management options are available for soils throughout the Project area. The report will also contain conclusions regarding the nature



and extent of impacted soil that can be ascertained from the analytical data and field observations. Potential soil management strategies will be discussed and preliminary unit costs for soil management will also be provided. This report will be submitted to VTDEC for review.

### **3.0 WORK SCHEDULE SUMMARY**

VHB proposes to perform the field effort described above within 5 weeks of receiving a formal notice to proceed by the City and will request that drilling and analytical invoices be dated prior to June 1, 2019. VHB will have a draft report available for the City to review within 3 weeks of the receipt of analytical results. VHB will strive to accelerate the work schedule to the best of our ability; however, VHB cannot be responsible for schedule delays caused by other entities (regulators, subcontractors, and/or the property owners).

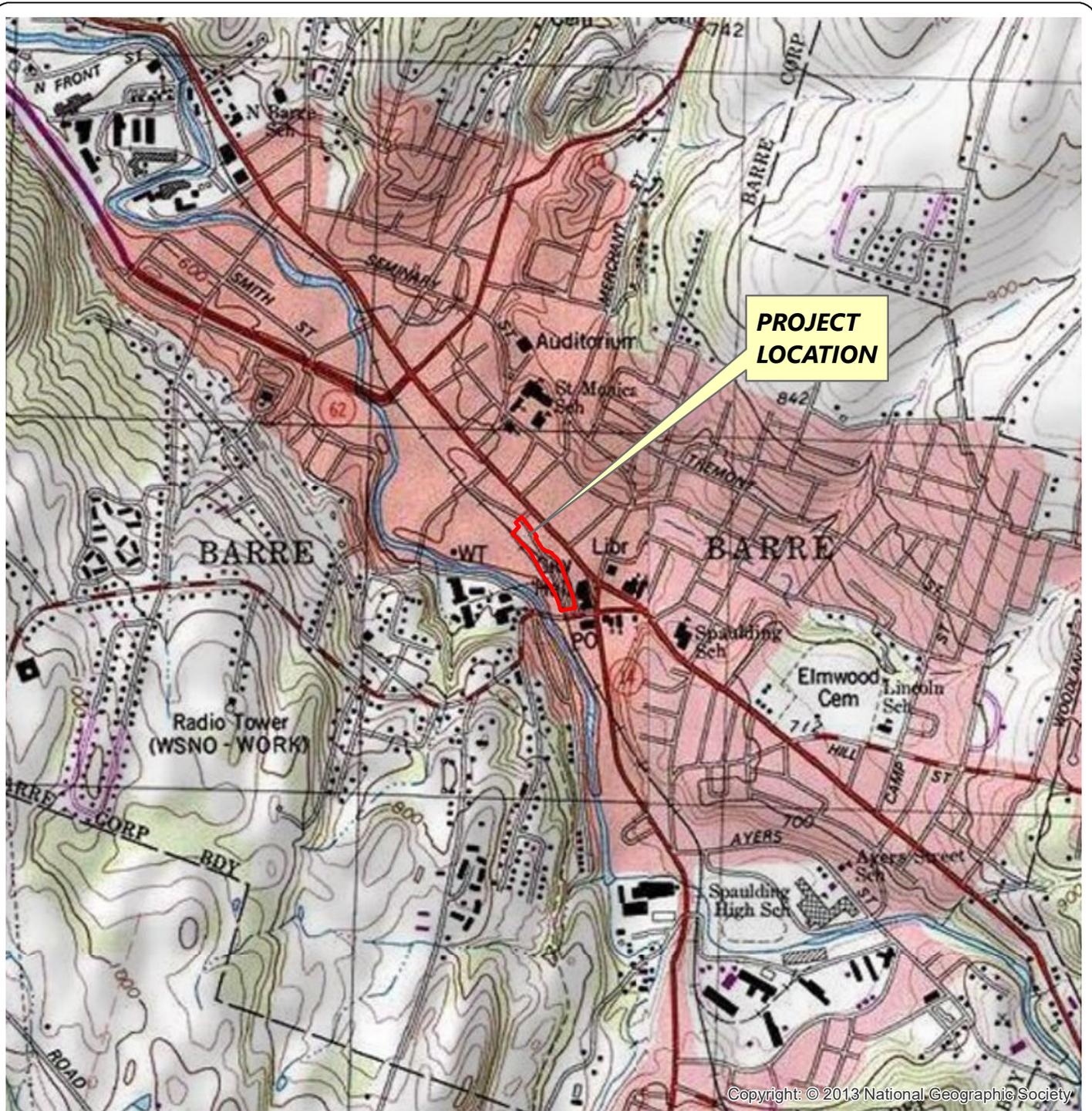
We appreciate the opportunity to present this Work Plan to the City for soil sampling in support of the Merchant's Row Redevelopment Project. We look forward to working with you on this project. Should you have any questions pertaining to this proposal, please feel free to contact me at (802) 778-1278.

Sincerely,

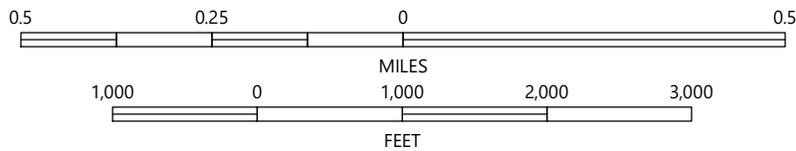


Kurt Muller, P.E.  
Senior Environmental Engineer

Attachments: Figure 1 – Project Location Map  
Figure 2 – Soil Analytical Results from 2012 Nobis Investigation  
Figure 3 - Proposed Soil Boring Locations



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CONTOUR INTERVAL: 20 FEET



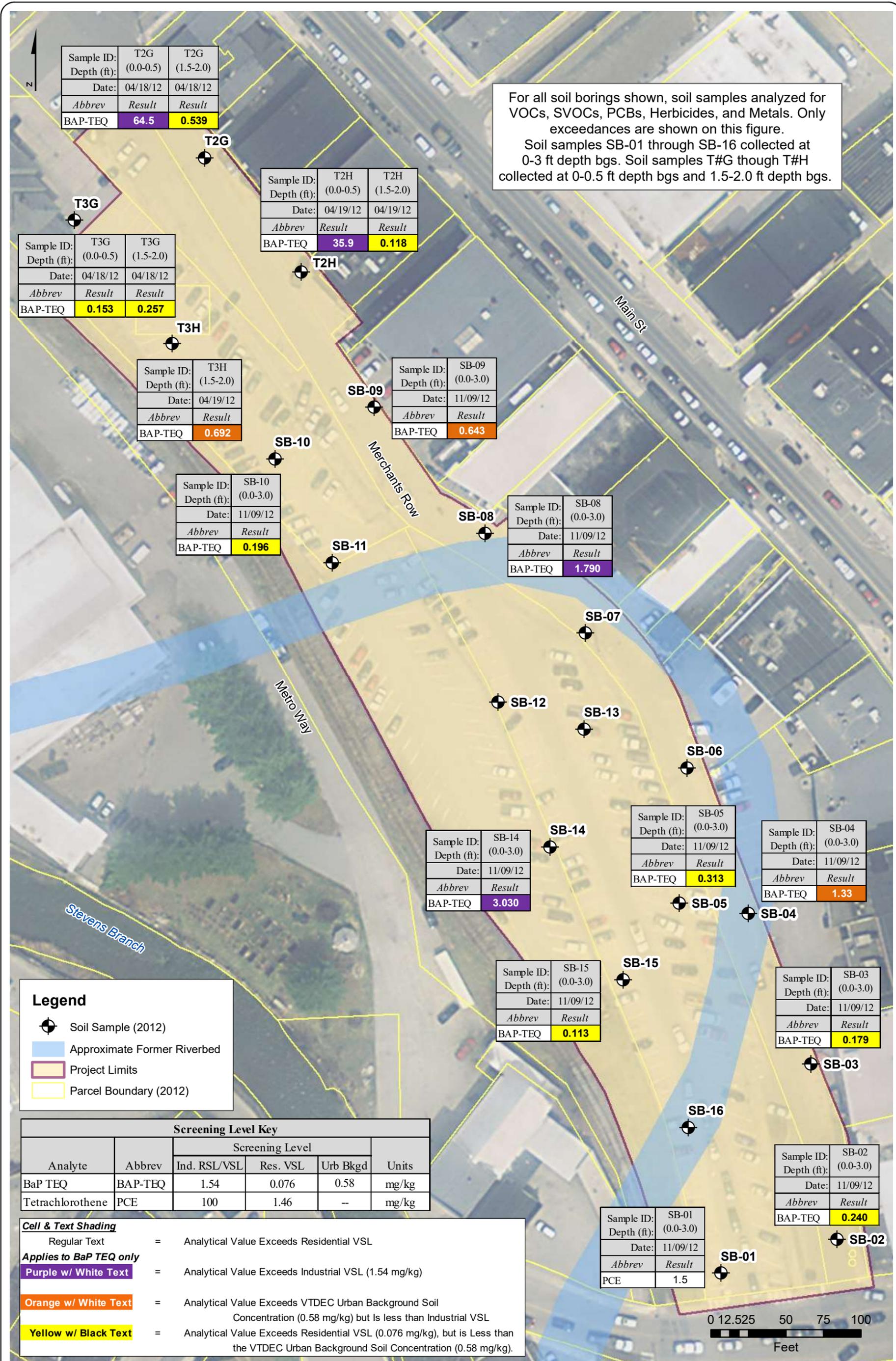
BASE MAP: USGS Seamless iTopo 1:24,000, December 12, 2009

**FIGURE 1: PROJECT LOCATION MAP**  
**MERCHANT'S ROW REHABILITATION PROJECT**  
**BARRE, VERMONT**



40 IDX Drive, Building 100, Suite 200  
 South Burlington, VT 05403

|                 |                   |
|-----------------|-------------------|
| Drawn by: SGH   | Date: 3/28/19     |
| Chk'd by: JKM   | Date: 3/28/19     |
| App'd by: JKM   | Date: 3/28/19     |
| Scale: As Shown | Project: 58341.00 |



**Legend**

- Soil Sample (2012)
- Approximate Former Riverbed
- Project Limits
- Parcel Boundary (2012)

**Screening Level Key**

| Analyte          | Abbrev  | Screening Level |          |          | Units |
|------------------|---------|-----------------|----------|----------|-------|
|                  |         | Ind. RSL/VSL    | Res. VSL | Urb Bkgd |       |
| BaP TEQ          | BAP-TEQ | 1.54            | 0.076    | 0.58     | mg/kg |
| Tetrachlorothene | PCE     | 100             | 1.46     | --       | mg/kg |

**Cell & Text Shading**

- Regular Text = Analytical Value Exceeds Residential VSL
- Applies to BaP TEQ only**
- Purple w/ White Text** = Analytical Value Exceeds Industrial VSL (1.54 mg/kg)
- Orange w/ White Text** = Analytical Value Exceeds VTDEC Urban Background Soil Concentration (0.58 mg/kg) but is less than Industrial VSL
- Yellow w/ Black Text** = Analytical Value Exceeds Residential VSL (0.076 mg/kg), but is Less than the VTDEC Urban Background Soil Concentration (0.58 mg/kg).

Notes:  
 Ind./Res. = industrial/residential  
 RSL: EPA Regional Screening Level  
 VSL: Vermont Screening Level (IRULE, July 2017)  
 Urb. Bkgd: VTDEC Urban Background Soil Concentration (IRULE, 2017)  
 BAP-TEQ: benzo(a)pyrene toxicity equivalence  
 Sources: Nobis (2012); VCGI (2012).  
 Aerial Imagery from NAIP (2016).

FIGURE 2: SOIL ANALYTICAL RESULTS FROM 2012 NOBIS INVESTIGATION  
 MERCHANT'S ROW REDEVELOPMENT PROJECT  
 BARRE, VERMONT

40 IDX Drive, Building 100, Suite 200  
 South Burlington, VT 05403

Drawn by: DEB Date: 12/10/18  
 Reviewed by: DVR Date: 12/10/18

Scale: 1 in = 60 ft Project: 58341.00

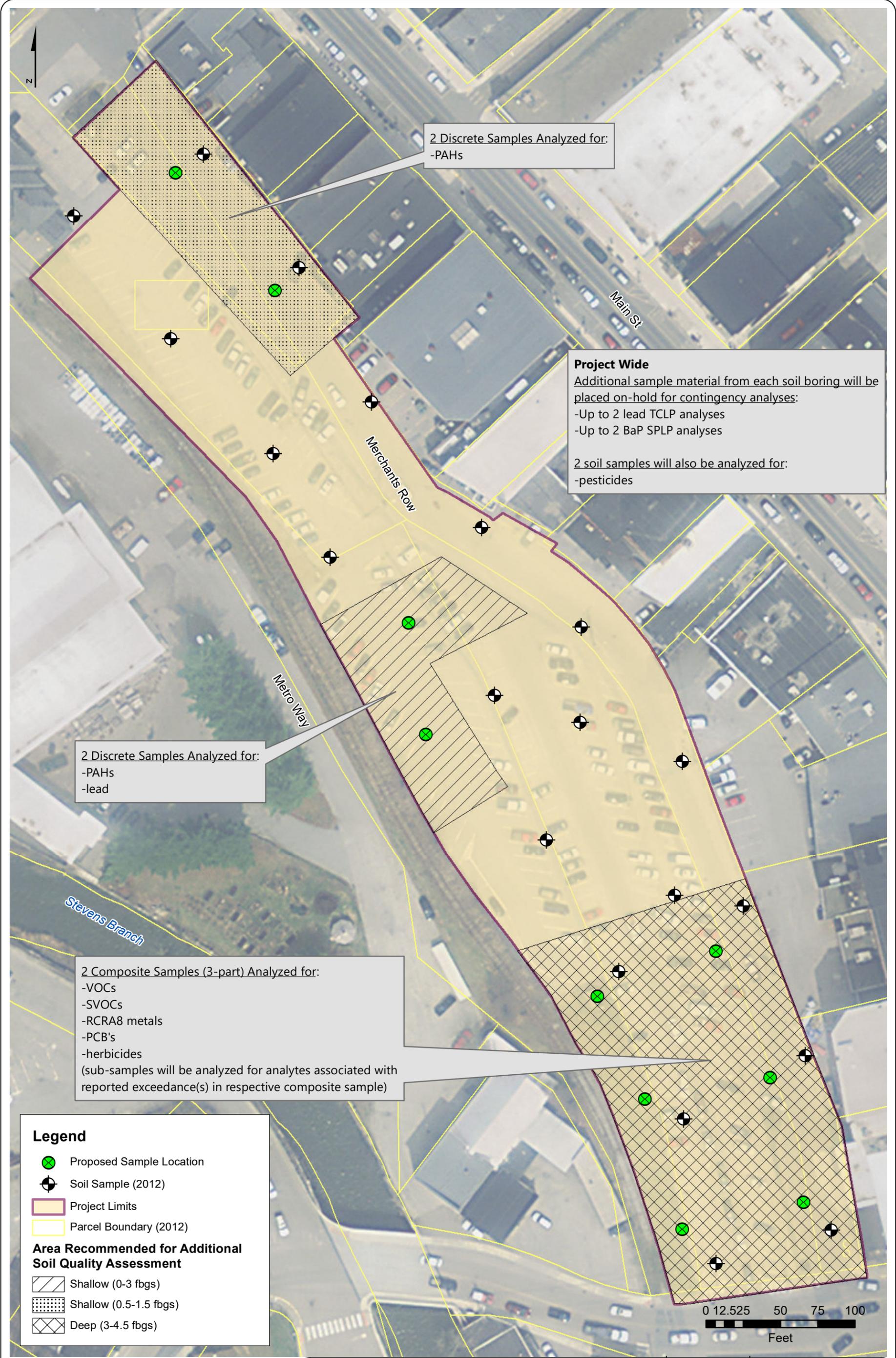


FIGURE 3: PROPOSED SOIL BORING LOCATIONS  
MERCHANT'S ROW REDEVELOPMENT PROJECT  
BARRE, VERMONT



40 IDX Drive, Building 100, Suite 200  
South Burlington, VT 05403

Drawn by: SGH Date: 4/1/19  
Reviewed by: JKM Date: 4/1/19  
Scale: 1 in = 60 ft Project: 583414.00

Sources: Nobis (2012); VCGI (2012).  
Aerial Imagery from NAIP (2016).