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Phase I Environmental Site Assessment

25 Brixton Road
West Hartford, Connecticut 06170

Prepared by:

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Prepared for:

Town of West Hartford, Connecticut

Department of Public Works
17 Brixton Road
West Hartford, Connecticut 06107

Project No. 16-0361
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1.0 Executive Summary

At the request of The Town of West Hartford Department of Public Works (DPW, Client), Strategic Environmental Services, Inc. (SES) performed a Phase I Environmental Site Assessment (ESA) of the property located at 25 Brixton Street in the Town of West Hartford, Connecticut (herein referred to as the Property). The Property is further identified by the Client as a 2.48-acre portion of a larger parcel identified by the West Hartford Assessor's Office as portion Map 14, Block 701, Lot 17 which is 24.2 acres in size. The Property is improved with a former municipal solid waste incinerator/solid waste transfer station, used oil and used battery recycling drop off and collection area, paved driveway, paved and unpaved parking areas and mulch/compost storage area. The incinerator/transfer station building consists of a 25,712 square foot three-level structure comprised of the partially abandoned former municipal incinerator and smokestack. The focus of this Phase I ESA is identification of Recognized Environmental Conditions (RECs) that may be encountered during demolition and redevelopment activities on the Property.

This ESA was completed in conformance with the scope and limitations of the American Society for Testing and Materials (ASTM) International's Designation E1527-13, "Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process". ASTM E1527-13 is consistent and compliant with the United States Environmental Protection Agency's (USEPA) final rule for All Appropriate Inquires (AAI Standard), codified at 40 CFR Part 312. The purpose of the ESA was to identify RECs, controlled RECs (CRECs), and/or historical RECs (HRECs) in connection with the presence or likely presence, use or release of oil and/or hazardous materials (OHM) on the Property. The definitions of RECS, CRECS, and HRECs and the findings of the ESA are summarized in the sections below.

1.1 Recognized Environmental Conditions

Results of the Phase I Environmental Assessment have identified a number of potential Recognized Environmental Conditions (RECs) at the Site as follows:

- Disposal of solid waste and incinerator ash on the Property and surrounding areas to depths potentially greater than 30 feet below ground surface;
- Operation of a used oil and used battery recycling collection facility on the Property, with the potential for spills and releases during transfer of used oil;

- Current and historical use and storage of oil and/or potentially hazardous materials within the Maintenance Area. This area contained a 500-gallon diesel fuel AST a 300-gallon used oil AST and an open 30-gallon plastic drum partially filled with used oil. A number of other containers of lubricants, paints and oil ranging in size from 5 gallons to one quart were observed in this area. The concrete floor near the used oil AST was stained with oil.
- Several 5-gallon pails of roofing asphalt and roof cement were observed in the unused portion of the incinerator building;
- The suspected presence of an unregistered heavy oil UST with an estimated capacity between 5,000 and 6,000 gallons beneath or adjacent to the north side of the Ash Hopper Area;
- A heavy concentration of bird guano on the Crane Deck;
- Leaking hydraulic oil in the waste compaction equipment located on the east side of the Ash Hopper Area;
- Peeling suspected lead based paint on concrete and metal surfaces throughout the western interior (unused) portion of the incinerator building;
- Suspected ACM thermal insulation on piping throughout the western portion of the incinerator building;
- Suspected ACM or PCB caulk and window glazing throughout the building;
- Suspected ACM transite siding covering the portion of the building enclosing the flue leading from the flue gas from the scrubbers to the smokestack;
- Suspect ACM firebrick within the furnaces and unused firebrick stored in the Ash Hopper Area;
- The potential for PCB and mercury containing electrical equipment in facility controls and switch gear and PCBs in facility transformers;
- Due to close proximity, location (potentially upgradient), three nearby properties represent potential RECs. These include the Dog Pound, the DPW Maintenance Facility and the Former Safety Kleen TSDF facility. A review of Federal Databases revealed the documented use and/or release of oil or hazardous materials at each of these properties. A release of gasoline to subsurface soil and groundwater identified during the removal of one 15,000 gallon UST on the adjacent DPW property. A potential release of home heating oil was identified during the removal of one 275-gallon UST from the Dog Pound. Releases of oil and hazardous materials, contamination of soil and groundwater and numerous hazardous waste regulations leading to a significant enforcement action

that terminated TSDF operations was documented at the former Safety Kleen TSDF facility located across Brixton Street from the Property.

1.2 Recommendations

Our recommendations to address the RECs identified on the Property and surrounding area are as follows:

- Identify and remove contents of containers of materials that are not being actively used in building operations, maintenance or recycling activities, and recycle or dispose of their contents;
- Evaluate the floor tile disposal area located near the lower employee entrance and removed this material from the Property for proper disposal;
- Empty and properly dispose of oil remaining in the trash compactor hydraulic system and the used oil AST. Analysis of these materials should be performed prior to removal to determine if they can be recycled or require disposal as hazardous wastes;
- Clarify the generation of hazardous wastes that took place in December 1987 and February 1988 to determine the activity and location associated with their generation;
- Conduct a hazardous building materials assessment of the incinerator building;
- Conduct a geophysical survey of the northwestern corner of the Ash Hopper Area to determine the presence, size and orientation of the suspected heavy oil UST.
- Conduct a Phase II investigation of portions of the Property that may be disturbed during demolition of the building.
- Should a determination as to the regulatory status of the site with regard to the CT Transfer Law be desired, legal counsel should be consulted.

2.0 Scope of Work and Limitations

This report documents the findings, opinions and conclusions of a Phase I Environmental Site Assessment (ESA) of a 2.48-acre portion of the property located at 25 Brixton Street West Hartford, Connecticut (hereinafter referred to as the "Property")

2.1 Purpose

The purpose of this ESA was to identify *Recognized Environmental Conditions* (RECs) in accordance with the scope of ASTM Practice E 1527-13 for the Property.

2.2 Scope

This ESA is conducted in accordance with the ASTM Standard Practice E 1527-13, consistent with a level of care and skill generally practiced by the consulting profession for services performed under similar circumstances. This ESA does not include an evaluation or quantification of asbestos containing materials (ACM), PCBs in building materials or lead based paint, although observations of the presence of material that may consist of or include suspected ACM, PCBs and lead based paint were recorded during the property reconnaissance. Any other additions, deletions or deviations to ASTM Practice E 1527-13 are noted below or in the corresponding sections of this report. The scope of this assessment includes an evaluation of the following:

- Physical setting characteristics of the Property through a review of referenced sources such as topographic maps and geologic, soils and hydrologic reports.
- History of the uses of the Property, adjoining properties and surrounding area through a review of referenced sources such as fire insurance maps, city directories, aerial photographs, prior reports and interviews.
- Current Property uses and conditions including observations and interviews regarding the following: use, treatment, storage, disposal or generation of hazardous substances, petroleum products and hazardous, regulated, or medical wastes; equipment that is known or likely to contain PCBs; storage tanks and drums; wells, drains and sumps; and pits, ponds or lagoons.
- Uses of adjoining and surrounding area properties and the likelihood of known or suspected releases of OHM to migrate onto the Property.
- Information in referenced environmental agency databases and local environmental records within the specified approximate minimum search distances from the Property.

- Recording of visual observations of suspected ACM, PCB-containing materials, lead based paint and Universal Wastes. These materials were not tested to confirm their presence or quantify their amounts.

2.3 Assumptions, Limitations and Exceptions

SES has prepared this Phase I Environmental Site Assessment using reasonable efforts to identify overt RECs associated with OHM at the Property. Findings within this report are based on information collected from observations made on the days of the Property reconnaissance and from reasonably ascertainable information obtained from certain public agencies and other referenced sources which we are reasonably entitled to rely upon.

This report is not definitive and should not be assumed to be a complete or specific definition of all Property conditions above or below grade. Current subsurface conditions may differ from conditions implied by surface observations or historical sources and can be most reliably evaluated through subsurface assessment ore hazardous building material investigation techniques that are beyond the scope of this report. Information in this report is not intended to be used as a construction document and should not be used for those purposes.

SES makes no representation or warranty that the past or current operations at the Property are, or have been, in compliance with all applicable federal, state and local laws, regulations and codes. This report does not warrant against future operations or conditions, nor does it warrant against operations or conditions not investigated. Regardless of the findings stated in this report, SES is not responsible for consequences or conditions arising from information that were not fully disclosed to SES during the assessment.

As is common practice, an independent data research company provided the governmental agency database report referenced in this report. Surrounding area properties were listed within specific minimum search distances intended to meet the requirements of ASTM Practice E 1527-13. The information in the governmental agency database is assumed to be correct and complete unless obviously contradicted by SES's observations or findings reviewed during the assessment. A deed or title search for the Property or surrounding properties was not performed as part of this ESA.

Reasonable efforts were made to identify evidence of aboveground and underground

storage tanks, aboveground storage tanks, and ancillary equipment, as well as evidence of the historic and current use or release of hazardous materials or petroleum products on the Property during the assessment. These efforts were limited to observation of accessible areas, review of referenced public records and interviews with available officials and persons. These methods may not identify subsurface equipment or evidence hidden from view by things such as, but not limited to, buildings, material stockpiles, paving, construction activities, stored materials, and landscaping.

Any estimates of costs or quantities in this report are approximations based on findings that are limited by the scope of the assessment, schedule demands, cost constraints, accessibility limitations and other factors generally considered inherent in performing an ESA.

This investigation did not include a detailed deed, lien or record of ownership search for the Property or surrounding properties.

2.4 Special Terms and Conditions (User Reliance)

This report is for the use and benefit of, and may be relied upon by The Town of West Hartford Department of Public Works (DPW) their successors and/or assigns and any of its affiliates, and third parties authorized in writing by The Town of West Hartford DPW, their successors and/or assigns, and SES, including lender(s) involved with a secured financing of the Property, and their respective successors and assigns. Any third party agrees by accepting this report that any use or reliance on this report shall be limited by the exceptions and limitations in this report, and with the acknowledgment that actual Property conditions may change with time, and that hidden conditions may exist at the Property that were not discovered within the authorized scope of the assessment.

SES makes no other representation to any third party except that it has used the degree of care and skill ordinarily exercised by environmental consultants in the preparation of the report and in the assembling of data and information related thereto. No other warranties are made to any third party, either expressed or implied.

3.0 Introduction

This Phase I Environmental Site Assessment (ESA) has been prepared by Strategic Environmental Services (SES) on behalf of The Town of West Hartford Department of Public Works (Client) for a 2.48-acre portion of the parcel of land located at 25 Brixton Street Town of West Hartford, Connecticut and is hereinafter referred to as the "Property." The entire parcel is depicted by the West Hartford Assessor as Map 14, Block 701, Lot 17. The following table provides an overview of the project.

Project Information	
Item	
Project Number	16-0361
Subject Property Address	2.48 -acre portion of 25 Brixton Street, West Hartford, Connecticut
Specific Map/Lot Nos.	Portion of Map 14, Block 701, Lot 17
Subject Property Name	Former West Hartford Municipal Solid Waste Incinerator
Property Inspection Date	August 2, and August 10, 2016
Weather Conditions	8-2-16 Cloudy, 73º F occasional showers. 8-10-16 Rain, upper 70's F
Environmental Professional	John L. Meyer, LEP
Property Location	The Property is located at 25 Brixton Street West Hartford, CT and consists of 2.48 acres of land improved with a 25,712 square foot former solid waste incinerator.
General Setting	Mixed Industrial, Commercial
Property Use	Zoned for General Industrial. Occupied by a former solid waste incinerator and transfer station, and incinerator ash landfill. Prior to construction of the incinerator a portion of the property was used as a municipal solid waste landfill. Currently use is a waste reduction and yard waste/wood waste composting facility and used oil and used battery recycling collection area.

3.1 Geographical Location

The Property location is identified on the enclosed **Figure 1**, Site Locus Map. Site coordinates depict the Property at 41.7328170 North Latitude and 72.7215670 West Longitude. The corresponding Universal Trans Mercator (UTM) coordinates are 4622407.5 meters north and meters east, in Zone 18. A site layout plan is included in **Figure 2**, Layout Plan.

Site Description

The Property primarily consists of developed land zoned by the Town of West Hartford for General Industrial (GI) use. The Property encompasses a total area of 2.48 acres of land and is improved with a three story, 25,712 square foot brick, masonry block and steel structure that formerly was the Town's municipal waste incinerator and solid waste transfer facility.
According to West Hartford Assessor records, the incinerator building was constructed in 1959.
The building contains a 4,335 square foot (approximate) scale house area that processes brush and yard wastes for the Town's composting operations and a recycling collection area for residents to recycle used oil and batteries. The lower level of the scale house area is used to store and maintain equipment and fuel used in the composting operations and used oil that supplies the Maintenance Area heating system. The remaining portions of the building contain defunct equipment and controls of the former incinerator and transfer station compactors and support facilities. This section of the building is unoccupied with the exception of a lavatory and break room used by employees of the scale house and composing operator (Supreme Forest Products).

According to former DPW employee Raymond Brignano, a single storage tank that contained either No. 4 or No. 6 fuel oil is located beneath or adjacent to the portion of the building containing the incinerator furnace ash hoppers. Fuel from this tank was used to burn the municipal waste when its moisture content was too high to allow for a self-sustaining combustion.

The portion of the parcel surrounding the Property contains a bituminous/gravel parking area to the northwest, a north-south oriented bituminous drive leading to and from the scale house, a small portion of a composting operation and compost product storage to the southwest and south, and an unpaved area to the east containing finished composite/mulch product storage bins and a covered sand/salt mix storage area.

Seven storm water catch basins are located throughout the property. These basins are presumed to discharge to the South Branch of the Park River. Utilities provided to the Property include underground sewer, water, natural gas, and aboveground electric, telephone and cable. The former incinerator scale house office and break room area is heated by electricity. The maintenance area located beneath the transfer station drop off area is heated by a used oil furnace. Topography at the Property varies by approximately 20 feet across the site with the highest area located near the incinerator stack to the west and the lowest to the east near the compost storage bins. The property reportedly contains an abandoned 500-foort deep water well that is developed in bedrock. The boundary of the Property is further depicted on **Figure 2**.

3.2 Summary of Property Improvement

Project Improvements	
Item	**Description**
Size of Property	2.48 acres
Topography of Property	Generally higher in the southwest and central portions, slopes steeply to the north and moderately to the east.
Unimproved Areas	The area to the south of the incinerator building contains part of the compost/mulch storage operation and a paved drive leading from the scale house. The area to the west is a paved parking area associated with a adjacent fire training operation. The northern portion of the Property contains an unpaved parking area and a bituminous paved ramp leading to the scale house. The eastern portion of the Property is unpaved and contains uncovered mulch/compost storage bins and a covered salt/sand storage bin.
Surface Water	Trout Brook is situated on the western portion of the Lot 17 parcel and discharges into the South branch of the Park River. The confluence of these two waterbodies is located approximately 800 feet to the southeast of the incinerator building.
Utilities	Municipal water and sewer, electric, natural gas, telephone and cable utilities.
Number of Buildings	One 25,712 square foot concrete block/brick veneer structure that was the Town of West Hartford's former municipal waste incinerator. The portion of the building's scale house and tipping floor is used as a processing area for brush and yard wastes and for drop-off and collection area for used oil and batteries.
Current Occupancy Status	The scale house area is occupied by Supreme Forest Products, who operates the on-site used oil/battery recycling collection and drop off and composting operations.
Building Description	The incinerator building was originally constructed in 1959. It consists of approximately 25,712 square feet. Approximately 5,500 square feet are occupied by Supreme Forest Products, with the remainder abandoned and in poor condition.
Heating system	The scale house and break room are heated electrically. The maintenance area located below the scale house floor was formerly heated by used oil.

3.3 Description of Surrounding Properties

The property is located on the south side of Brixton Street approximately 800 feet west of Oakwood Avenue in the Town of West Hartford, Connecticut. Surrounding properties are primarily industrial with some commercial and transportation. Immediately abutting the property to the west is a paved area associated with the Town of West Hartford's fire training facility and Dog Pound (36 Brixton Street). A former cement unloading facility is located in a wooded area further to the northwest. Further to the west is the Conrail railroad right of way, the CTfastrack Busway and Trout Brook.

Immediately abutting properties to the north include a pest management company, a landscaping contractor (Zysk Brothers Contracting, 30 Brixton Road), further to the north is Sayco Paint Distributors, (695A Oakwood Avenue). The eastern property boundary is occupied by the West Hartford DPW maintenance facility and offices (17 Brixton Street). Directly abutting the property to the west is the City of West Hartford's yard waste composting and waste volume reduction facility which is operated by Supreme Forest Products. Further to the west is a forested area abutting Trout Brook and the South Branch of the Park River.

Areas to the north, south, east and west of the abutting properties are developed with commercial/industrial facilities. Underground water, sewer and natural gas are available to the Property and surrounding properties. Surrounding properties have natural gas available to them. Cable, telephone, and electrical utilities are available aboveground. All utilities enter the property from Brixton Street.

3.4 Environmental Resource Areas

Groundwater at the Property and surrounding properties is classified as GB which is not suitable for direct human consumption, due to discharges, chemical spills, or leaks and other possible land use impacts. There are no known Public Water Supply Sources within a ½ mile of the site. Municipal water is available to the Property and all surrounding properties. Based on the location and proximity to Trout Brook and the South Park River, groundwater across the Property is anticipated to flow in a southerly direction. Based on the information contained in the EDR report and observations made during the Site Reconnaissance, the depth to groundwater on the Property is expected to range from 5 to 30 feet below surface grade.

Trout Brook flows in a southeasterly direction, joining the South Park River near the southeastern corner of the property. Trout Brook is classified as a Class A waterway by the CT DEEP. Class A waters meet water quality criteria suitable to support aquatic life, potential drinking water supply, industrial and agricultural water supply and contact recreation. The South Branch of the Park River is classified as a Class B waterway. Class B waters are suitable for

support of aquatic life, agricultural and industrial water supply and recreation but not potable water supply due to the presence of pollution. Based upon a review of public water supply information provided on the CT DEEP GIS website, the Property is not located in a flood plain. However, the nearby banks of Trout Brook and the South Park River are within a 100-year flood plain.

The Property is situated between approximately 62 and 44 feet above mean sea level. Topography at the western and southern perimeters of the Property slope moderately to the south and east and steeply to the north. According to the Quaternary Geology Map of Connecticut and Long Island Sound (Stone, Schafer, London and Thompson, 1992), surficial geology of the Property consists of varved clay glacial lake bed deposits. According to the Bedrock Geology Map of Connecticut (Rogers, 1985), bedrock underlying the Property is Triassic sandstones and mudstones, situated at a depth ranging between 50 and 100 feet below surface grade.

4.0 Standard Historical Record Search

4.1 Historical Record Search Scope of Work

A Historical Records Search in conformance with the scope and limitations of the ASTM Standard Practice E 1527-13 was conducted for the Property. The focus of this research is to determine whether any past use of the Property would suggest the presence of contamination associated with the Property from the present back to historical topographic maps dated 1892. If reasonably ascertainable, sources of data should include fire insurance maps showing the Property, local street directories, historical topographic maps and/or historical aerial photographs. In addition, interviews are also conducted with local municipal officials. SES utilized Environmental Data Resources, Inc. (EDR) to provide an historical database search for the subject property. A copy of the EDR report is included in **Appendix A.**

4.2 Historical Record Search Summary

STANDARD HISTORICAL RECORD SEARCH	
Item	**Reference Source**
Sanborn Fire Insurance Maps	Sanborn Fire Insurance Maps from 1979 and 1950
Historical Aerial Photographs	Historical Aerial Photographs from 1934 to 2012
Historical Topographic Maps	Historical Topographic Maps 1882 to 2012
Other Historical Sources such as: • Previous Environmental Reports • Building & Planning Department Records • Department of Public Works Records • Local Fire Department	Review of DEEP, Public Works, Assessor and Fire and Departments was performed.
Interviews with local officials and employees	Ray Brignano, former supervisor of the incinerator and transfer facility operations. Mark Hallenbeck DPW employee.

Sanborn Fire Insurance Maps

Sanborn Fire Insurance Maps for the Property and the surrounding area was conducted by EDR. Maps for the Property were available for the years 1950 and 1972. **Appendix A**.

Period	Property	Surrounding Area	Comments
1950	Undeveloped	Vacant undeveloped land north and south, wooded undeveloped land and the railroad row to the west. Land to the east is not depicted. Building material and steel product warehouses are located northeast across Brixton Street from the Site.	Records indicate the property was undeveloped. Developed properties in the surrounding area were primarily industrial or commercial

1972	Developed with what appears to be the present day incinerator and a dog pound.	A property to the north contains another building identified as a Dog Pound. A building appears to the north across Brixton Street. The warehouse building is also present.	Records indicate the property and surrounding area were primarily industrial or commercial.

Historical Aerial Photographs

Historical aerial photographs were reviewed for the years 1934, 1941, 1943, 1951, 1957, 1962, 1965, 1970, 1977, 1986, 1989, 1990, 1992, 1995, 2005, 2006, 2008, 2010, and 2012. The following table summarizes the findings of the Historical Aerial Photographs pertaining to the Property and surrounding area uses. Aerial photographs are included in **Appendix A.**

Period	Property	Surrounding Area	Comments
1934	The property and immediately surrounding area contains four bodies of open water, reported to be flooded former brick clay pits.	The area immediately surrounding the site and to the immediate north of Brixton Street is undeveloped. The area to the east of the Oakwood Ave. extension is undeveloped. An oxbow feature is present in the South Park River floodplain.	The rail line is present to the west of the Property. Warehouse building are present well to the north of Brixton Street. The Town purchased the land in 1937.
1941	The property and immediately surrounding area contains one body of open water in its eastern portion. The water bodies to the west have been filled.	The area immediately to the north of Brixton Street and east of Oakwood Avenue Extension remains undeveloped.	The warehouse facility to the north appears to have a larger area of outdoor material storage. The South Park River is obscured in this photo.
1943	The property and immediately surrounding area contains one body of open water in its eastern portion. The water bodies to the west have been filled. Fill appears to be encroaching on the eastern water body.	The area to the north of Brixton and east of Oakwood appear similar to the previous photograph.	The oxbow feature in the South Park River is not present.
1951	All water bodies in the property and immediately surrounding area have been filled. Disturbed soils are widespread in the area surrounding the property.	The area to the north of Brixton Avenue and abutting Oakwood is developed with Commercial/industrial facilities. Fill appears to be present in the area to the south of Dexter Avenue.	Disturbed soils on the property appear to be the result of filling. Commercial development is expanding to the north of Brixton Street.

1957	The incinerator building appears in the photograph. Filling on the property and immediately surrounding area extends to the edge of Trout Brook and the South Park River. Disturbed soils are present throughout the area.	The area to the north of Brixton Avenue and abutting Oakwood appears to be undergoing filling. The area is developed with commercial/industrial facilities. Additional extensive fill appears to be present in the area to the south of Dexter Avenue. Commercial or industrial development is expanding along Oakwood to the north of Brixton and in the area to the west of the railroad.	The incinerator building may be under construction at this time.
1962	The Incinerator building is completed and in operation. Widespread disturbed soils are present on the Site and the surrounding area.	Piles of material are present on land to the north of Brixton and south of Dexter Ave. Commercial and industrial development continues to expand north of Brixton along Oakwood and in the area west of the railroad.	Material piles noted in this photo may be composed of incinerator ash.
1965	The property and immediately surrounding area are similar to the previous photograph. Piles of material are present to the northwest of the incinerator in the current location of the dog pound building.	Commercial and industrial development continues to expand along Oakwood and Dexter and west of the railroad. A large building and parking lot are present on one of the parcels south of Dexter where filling was evident on earlier photos.	Material piles noted in this photo may be incinerator ash.
1970	The property and immediately surrounding area are similar to the previous photograph. Piles of material and soil disturbance are present in the area to the north, northwest and southwest of the incinerator building.	The DPW maintenance facility is present in this photograph. Otherwise, the surrounding area is similar to the 1965 photograph.	Material piles noted in this photo may be incinerator ash.
1977			This photograph is of poor quality
1986	The dog pound and fire training buildings appear in this photograph. Composting operations are evident on the	The current DPW maintenance facility and offices are present in this photograph. Large piles of material are present on	The incinerator and transfer station shut down in 1972 and 1974, respectively. Composting operations

	Property and the immediately surrounding area.	the DPW property. Two buildings have been constructed along Brixton Street north of the Property.	are being performed on the property and surrounding area. The piles of material on the DPW property may be a sand/salt mix.
1989	Conditions are similar to the previous photograph. Windrows of composted material are present in this photograph.	Conditions are similar to the previous photograph.	
1990	Conditions are similar to the previous photograph. Windrows of composted material are present south of the incinerator building.	Conditions are similar to the previous photograph.	
1992	Conditions are similar to the previous photograph. Windrows of composted material are present west and south of the incinerator building.	Conditions are similar to the previous photograph.	
1995	Conditions are similar to the previous photograph.	Conditions are similar to the previous photograph.	
2005	Conditions are similar to the previous photograph.	The DPW salt shed is present in this photograph. The large building constructed in the filled area south of Dexter appears to be vacant.	
2006	Conditions are similar to the previous photograph.	Conditions are similar to the previous photograph	
2008	Conditions are similar to the previous photograph.	Conditions are similar to the previous photograph. The Safety Kleen building located north of Brixton appears to be vacant.	
2010	Conditions are similar to the previous photograph except that compost windrows are concentrated in the southeastern corner of the surrounding area.	Conditions are similar to the previous photograph. The building in the fill area south of Dexter appears to have been demolished.	
2012	Conditions are similar to the previous photograph except that piles of soil or debris appear to have increased in the western portion of the surrounding area.	Conditions are similar to the previous photograph.	

Historical Topographic Maps

Historical Topographic Maps for 1892, 1893, 1906, 1944, 1945, 1952, 1964, 1972, 1976, 1984, 1992 and 2012 were reviewed by using EDR's Historical Topo Map Report. The Report includes a search of a collection of public and private color historical topographic maps, dating back to the late 1800s. The brick pits and brick making operation are not depicted on the 1882 and 1883 maps. The 1944 and 1952 maps show Brixton Street as an unpaved road, with a wetland areas and a small pond present on the property. These two maps show increased development within the surrounding areas. The 1964 map shows Brixton Street as a paved road and depicts both the incinerator building and former DPW building, but not the wetland or small pond seen in earlier maps. The 1964 map depicts a considerable increase in development of the surrounding area. The 1984 and 1992 maps show a new building to the south of the DPW building and continued industrial commercial development of the surrounding area. The 2012 map shows the surrounding area as developed, but does not depict individual buildings.

Municipal Research

On August 2, 2016, SES reviewed records available from the Town of West Hartford Municipal Offices, including the Fire Department, Tax Assessor, DPW and Engineering Department.

Tax Assessor

West Hartford's Assessor records show that the Property has been listed under the ownership of the Town of West Hartford since 1937, when it was purchased it from the Fernwood Corporation. There are no property records available indicating when Fernwood Corporation purchased the property. Records available from the DPW indicated that construction of the incinerator was completed in 1959.

Fire Department

There were no records available for the property from the West Hartford Fire Department.

A letter dated July 10, 1995 from the CT Department of Environmental Protection (DEP) to the Town of West Hartford indicated that UST systems at the 17 Brixton Street facility (Site ID 8133) were temporarily out of service for greater than 90 days. The letter states that the UST systems have exceeded their deadlines for usage based on average life expectancy as defined by CT State Regulations. The letter required the UST systems be permanently closed. A letter dated July 18, 1995 from the Town of West Hartford Department of Community Services to the CT DEP UST Enforcement Program indicated the status of the following USTs at the DPW facility:

- 8,000-gallon steel UST, contents unspecified installed in September 1969, failed a tightness test and was removed in April 1991;
- Two 4,000-gallon USTs, content s unspecified installed in September 1991 removed in April 1991;
- One 15,000-gallon UST date of installation unknown containing gasoline removed in March 1992.
- One 10,000-gallon steel USTs containing gasoline installed in 1989 and one 15,000-gallon steel UST containing diesel fuel installed in January 1977 remained on the Site.

Underground Storage Facility Notifications filed with the Town of West Hartford's Fire Department in December 1998 for the adjacent DPW facility indicated the above referenced 15,000-gallon steel UST containing diesel fuel failed a tightness test in December 1997 and was removed. The above referenced 10,000-gallon steel UST that contained gasoline was converted to diesel in March of 1998. This UST failed a tightness test in November 1999 and was removed.

Fire department records indicated that a fuel spill incident took place on that the DWP facility (Incident 12-21-00). This incident involved a leak of approximately 5 gallons of diesel fuel from a snowplow fuel tank and a small amount entered an on-site catch basin. The fuel did not flow out of the basin. Spill contractor United Oil Recovery responded to the release. The surface spill was absorbed with sand, and the catch basin was pumped out and cleaned. Approximately 55 gallons of solids were removed. The incident was closed.

Department of Public Works

The DPW maintains a set of records, including permits, notices of violation and correspondence with regulatory agencies dating back to1971. These are summarized as follows:

Summary of Property History

The history of the Property was summarized by the DPW as follows:

> 1937 to 1959: The Town acquired the property in 1937. From 1937 to 1959, the property and the surrounding area were used to landfill residential and commercial solid waste and bulky waste. The landfill was unpermitted.
>
> 1959: The Town constructed and operated a solid waste incinerator for West Hartford residential and commercial waste. Incinerator ash was placed on top of the areas land filled with solid waste.

1968: The Town constructed the DPW facility at 17 Brixton Street on a portion of the land filled area. Additional buildings including a vehicle maintenance area and salt storage shed were constructed during the period from 1995 to 1996.

1971: The Environmental Protection Agency (EPA) forced that shut down of the incinerator due to air quality issues. The Town received approval from the DEP to modify the incinerator and install air pollution control equipment. Proper landfill methods were required for disposal of ash residue.

1974: The Town lowered the profile of the ash landfill between 15 and 20 feet by removing ash from the lower tier of the Site. The material was removed to the Rockledge Golf Course with DEP approval dated March 12, 1974.

1972 to 1977: The Town continued to operate the incinerator after EPA approved modification to improve the quality of air emissions. Municipal solid waste was temporarily moved to an off-site location.

1977: The Town received a DEP permit to operate a 150 ton per day transfer station. Incinerator operations were discontinued. Two stationary hydraulic compactors capable of handling up to 1,200 tons of waste per day were installed and operated at the Site.

1989-1990: The Town received a permit to operate a 30,000 cubic foot leaf composting facility on 1.5 acres of land on top of the approved closed ash/solid waste landfill on the lower tier of the property. The upper tier of the property was approved as a compost storage area.

1991: Transfer station operations cease. Municipal waste is collected by private collection services and disposed of at the regional waste incinerator operated by the Connecticut Resources Recovery Authority (CRRA).

1991 to 1994: The Town operated the Property and surrounding area as a yard waste composting facility.

1994: The Town entered into a contract with Green Cycle to manage the transfer station recycling center and process the residential yard waste and leaves from the Town's annual fall leaf collection program.

1998 to 2001: A Notice of Violation was received from DEP for unauthorized wood waste volume reduction activity. The Town was granted a consent order to continue operation while an application for a Volume Reduction Facility was submitted and

processed. The application was submitted in January 1999, with review and response to comments taking place over an 18 to 20-month period. The application reached final technical review then was stalled due to DEP staff changes. The technical review was completed in June of 2010, and required reapplication for the permit. The permit was resubmitted in May 2011. In 2012, the Town requested that DEP table the permit review until further notice.

2014: The contract with Enviro Cycle expired.

Permits and Notices of Violation:

DPW records contained the following permits and Notices of Violation.

November 27, 1995: Registration under a General Permit CGS Section 22a-430b for Storm water Discharge Associated with Industrial Activity.

June 18, 2010: Comments on Application for a Leaf Composting Facility, Solid Waste Volume Reduction and Transfer Station Activities.

March 11, 1999: Notification from DEP to the Town that Application No. 199900190 for a Volume Reduction Facility/Transfer Station is sufficiently complete.

February 22, 1999: Notification from DEP to the Town that Application No. 199900190 for a Volume Reduction Facility/Transfer Station is insufficiently complete.

October 13, 1998: Notice of Violation No. SW-245. West Hartford Transfer Station Green Cycle Volume Reduction Facility. The NOV was based on an inspection of the facility conducted by DEP on September 8, 1998 that found the facility was operating a volume reduction facility that was not included in their facility permit and was mixing solid waste with clean fill and depositing it in a closed landfill located off Route 44 on the West Hartford/Avon line. No solid waste tonnage reports had been filed by the Town as required by the permit.

May 1 1996: Approval of disruption and Continued Post Closure Use of a Solid Waste Disposal Facility. This approval was issued for construction of the DPW salt storage facility. Permit conditions required that disturbed waste be placed beneath the proposed building and covered with at least 1 foot of soil.

September 26, 1989: Submission of registration forms for Town leaf composting facilities at Brixton Road and St. Thomas Seminary, Simsbury, CT.

September 22 1987: Permit to Operate a Solid Waste Transfer Station.

May 31, 1977: Permit to Operate a Solid Waste Transfer Station.

March 12, 1974: Permit for the Town to construct and operate an ash disposal landfill on 2.3 acres of land owned by the Town at the Rockledge County Club (Rockledge). The ash placed in the Rockledge landfill was removed from the 25 Brixton Street facility during site re-grading operations.

April 13, 1971: Approval of plans and specification for modification of the refuse incinerator plant to install air pollution control equipment.

According to information available at the Public Works Department, the Property and surrounding properties are connected to the municipal water and sewer systems. Copies of the DPW, Assessor and Fire Department records are included in **Appendix B**.

State Environmental Agency Records Review

Records available for the property in the Department of Energy and Environmental Protection (DEEP) files included.

Prior Reports

No prior environmental investigation reports were available for the property. According to DPW staff, there is no recollection of an environmental investigation being performed on the property. A geotechnical investigation report was present in the DEEP files that was performed in support of the DPW salt shed construction. Four borings and two test pits were advanced during the investigation. Samples collected during the investigation had organic content ranging from 28.5 to 26.8 percent in three samples to 7.9 to 14 percent in five samples. Soil boring logs indicated 2 to 3 feet of brown sand overlying landfill refuse consisting of trash, organics, ash, metals glass and decomposing wood mixed with fine to coarse sand. Depth of the refuse varied from 22 to 27 feet. The landfill refuse was underlain by gray clay.

Complaints and Notices of Violation

A memorandum of a violation of liquid effluent standards indicated that untreated quench water from the flue gas scrubbers was being discharged to the South Branch of the Park River during the period from February 1967 to April of 1969.

An inspection report described the incinerator ash content in May 1965 as being 20 percent ash, 15 percent glass, 2 percent stones, 7 percent metal (iron), 10 percent tin cans, 5 percent partially burnt organics, 1 percent unburned paper and charcoal and 40 percent sand.

A DEP memorandum dated July 3, 1972 summarized an investigation of air emissions violation complaints. The memorandum states the incinerators capacity was 350 tons per day, but had been reduced to 300 tons per day or 150 tons per furnace due to an increase in the BTU content of the waste being received. The memorandum also states that the incinerator, like most other municipal waste incinerators in Connecticut, has long been operating in violation of clean air regulations. Water spray scrubbers were recently added to the facility's emission control system.

At the time of the inspection only one furnace was in operation, and was exceeding its design capacity by approximately 50 to 70 tons per day. Verbal and written notice was issued to the incinerator operations superintendent regarding violations of the Abatement of Air Pollution regulations. The Town indicated that it would have its other incinerator back on line in several weeks which would eliminate the emissions problems. The memorandum recommended that the incinerator be re-inspected after July 12 1972, to determine if reported problems had been abated. Stack testing of the emissions were also recommended.

An undated DEP Solid Waste Incinerator report indicated that the capacity of the incinerator was 300 tons per day. On site disposal of ash was conducted. Industrial and agricultural waste sources were listed as Colt Industries, Pratt and Whitney, Spencer Turbine, McCauley and Lincoln Diary. Waste accepted at the incinerator during the year from December 1971 to January 1972 totaled 54,997 tons. Generation of incinerator ash during the same period totaled 27,472 tons, all of which was disposed of on the Property or surrounding land area. The inspection report indicated that new gas fired burners were installed in the facility.

The date of a major furnace overhaul was in 1972, with installation of flue gas scrubbers. Ash was removed from the furnaces by a hopper that discharged from the bottom of the furnaces directly into trucks. Quench water for the ash and scrubbers was obtained from an on-site well and discharged to the Park River. Smoke emissions density on the date of the inspection was No. 1 Ringlemann, which is equivalent to a 20% smoke density. Previous inspections reported Ringlemann densities as high as 4 or 5 (dense black smoke).

CT DEEP files for the period from April 24 1972 to July 24, 1973 contained 42 complaints from residents regarding air emissions from the incinerator. Complaints included the persistent presence of black smoke, foul odors and adverse health effects from exposure to the smoke.
DEP inspection indicated that the incinerator was emitting thick black smoke.

A letter from DEP Air Compliance to the Town Manager dated April 16, 1974 states that evaluation of the incinerator operation indicated it does not meet state or federal standards and requests a meeting with the Town to discuss how violation of state and federal standards may be remedied.

State solid waste records contained an analysis report for samples collected in 1981 from the onsite water supply well. Analysis results appeared to meet drinking water standards.

A March 25, 2015 memorandum from John Philips of DWP to Caren Harder of the DEEP Bureau of Material Compliance and Assurance stated that requested changes had been made to the signs indicating the locations of recycling drop off areas for collection of used oil and batteries.

5.0 Regulatory Record Search

5.1 Procedure

The most current database sources maintained by state and federal offices were searched and provided by EDR. Such databases were searched for properties with reported environmental issues within radii specified below, either by using geocoding information that identified the coordinates of the properties in the databases or by checking the street addresses of non-geocoded properties within the same zip code. A copy of the EDR report is included in **Appendix A.** A summary of these records is provided in Section 5.2.

5.2 Federal Agency Records

FEDERAL AGENCY RECORDS		
Source	**Criteria for minimum search distance (miles)**	**No. of properties within search distance**
NPL	1.0	0
De-listed NPL	0.5	0
CERCLIS	0.5	0
RCRA-CORRACTS	1.0	1
RCRA-TSDF	0.5	2
RCRA-Large Quantity Generator	0.25	1
RCRA- Small Quantity Generator	0.25	3
RCRA Conditionally Exempt Small Quantity Generator	0.25	0
Institutional Control Sites	0.5	1
State Hazardous Waste Sites	1	5
Landfill or Solid Waste Disposal Sites	0.5	1
LUST Sites	0.5	38
UST Sites	0.25	28
ERNS	Property Only	0
Federal IC/EC Registries	Property Only	0
Other Federal List	Property and Adjoining Properties	3

Federal CERCLIS List

Federal CERCLIS sites are those that are potentially hazardous waste sites that have been reported to the USEPA by States, municipalities, private companies and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation Liability Act, (CERCLA). CERCLIS contains sites which are either proposed to or on the National

Priorities List (NPL) and sites which are in the screening and assessment phase for possible inclusion on the NPL.

A review of the CERCLIS list, as provided by EDR, and dated 08/01/2016 has revealed that there are no CERCLIS sites within approximately 0.5 miles of the target property.

Federal CERCLIS NFRAP List

Archived sites are sites that have been removed and archived from the inventory of CERCLIS sites. Archived status indicates that, to the best of EPA's knowledge, assessment at a site has been completed and that EPA has determined no further steps will be taken to list this site on the National Priorities List (NPL), unless information indicates this decision was not appropriate or other considerations require a recommendation for listing at a later time. This decision does not necessarily mean that there is no hazard associated with a given site; it only means that, based upon available information, the location is not judged to be a potential NPL site.

A review of the CERCLIS-NFRAP list, as provided by EDR, and dated 08/01/2016 has revealed that there are three (3) CERCLIS-NFRAP sites within approximately 0.5 miles of the Property.

Property	Address	Direction/Distance (mi.) Elev.	EDR Map ID	EDR Page
Safety Kleen Systems	**24 Brixton Street**	**NE (0.063 mi) Lower**	**B24**	**13**
Colt's Manufacturing	**545 New Park Avenue**	**N (0.284 mi) Higher**	**Z164**	**46**
Royal Business Machines*	**1031 New Britain Ave.**	**SW (0.332 mi) Higher**	**AE183**	**52**

***AKA C+A Business Machine**

The closest listed property Safety Kleen Systems is situated on the opposite side of Brixton Road from the DPW facility. This site is listed as a CERCLIS-NRAP property due to the improper storage and disposal and multiple releases of Chlorinated VOCs, Oil and other Solvents. Due to close proximity of this site to the Property, the extent of the releases, severity of regulatory agency enforcement actions and potentially hydraulically upgradient location, this site is considered to represent a REC to the Property.

The listed Colt's Manufacturing and Royal Business Machines sites are not considered to represent RECs to the subject Property. Colt's Manufacturing is a Large Quantity Generator (LQG) of hazardous wastes including plating chemicals, corrosive, ignitable and reactive chemicals, and chlorinated and aromatic solvents. Numerous violations were reported during the 1990's. The most recent violation was reported in June 2007. Compliance was achieved in August 2007.

Royal Business Machines is also a LQG, generating spent halogenated and non-halogenated solvents, caustic washes, chromium and lead. Releases of oil and hazardous materials to soil and groundwater have occurred at this Site. Migration of contamination in groundwater and exposure to human receptors are reported to be under control.

These sites are situated greater than one quarter mile from the Property to the west of the rail line. Violations and releases at these sites appear to have been resolved or are under control. Neither of these Sites are expected to have a direct hydraulic connection to the Property. Further information regarding these sites are included in the attached EDR report.

Federal RCRA CORRCTS

RCRA CORRACTS: CORRACTS is a list of hazardous waste handlers with RCRA Corrective Action Activity. This report shows which nationally-defined corrective action core events have occurred for every handler that has had corrective action activity.

A review of the CORRACTS list, as provided by EDR, and dated 08/01/2016 has revealed that there are five (5) CORRACTS site within approximately 1 mile of the target property.

Property	Address	Direction/Distance (mi.)	EDR Map ID	EDR Page
Safety Kleen Systems	**24 Brixton St.**	**NE (0.063 mi) Lower**	**B24**	**13**
Colt's manufacturing	**545 New Park Ave.**	**N (0.284 mi) Higher**	**Z164**	**46**
Royal Business Machines*	**1031 New Britain Ave.**	**SW (0.332 mi) Higher**	**AE183**	**52**
Pratt and Whitney Co.	**Charter Oak Blvd.**	**NNW (0.559 mi) Higher**	**209**	**59**
Henkel Corp	**705 N. Mountain Rd.**	**SSE (0.801 mi) Higher**	**AK211**	**60**

***AKA C+A Business Machine**

Safety Kleen Systems is located directly across Brixton Avenue from the entrance to the Property. Safety Kleen Systems was an oil and hazardous materials Transportation Storage and Disposal Facility (TSDF) that was the subject of an investigation by the Connecticut DEP RCRA Unit. Wastes handled at the facility included spent chlorinated and non-chlorinated solvents, oil, toxic metal wastes and ignitable wastes.

Numerous significant violations of hazardous waste regulations and releases of contamination to the environmental at facilities operated by Safety Kleen at their Connecticut locations resulted in a Stipulated Judicial Order with penalty against the company in September 1998 that forced them to close and remediate all of their Connecticut operations. As of September 2003, the EDR report indicated that current human exposures and migration of contaminated groundwater at the Brixton Street Site were under control. Due to close proximity of this site to the Property, the extent of the releases, severity of regulatory agency enforcement actions and potentially hydraulically up gradient location, this site is considered to represent a REC to the Property.

The other listed RCRA CORRACTS sites are not considered to represent a REC to the subject Property due to the distance from the Property (0.25 miles or greater) and that these sites are not expected to have a direct hydraulic connection to the Property. Further information regarding these sites is included in the attached EDR report.

RCRA Generator Lists

The Property contains two records of episodic generation of hazardous waste in excess of 100 kg/month but less than 1,000 kg/month that classify the Property as a Small Quantity Generator. One shipment was in February 1998 for 75 gallons on DOO1 wastes consisting of an ignitable mix of gasoline and water. The other shipment was in December 1987 for 150 gallons of a DOO1 Ignitable mixture of gasoline and water. It is possible that these wastes were generated from the DPW garage facility (which is listed at a SQG) rather than the incinerator.

The DPW facility located at 17 Brixton Street is an SQG and periodically generates hazardous waste, including flammable mixtures of gasoline and water.

Other Federal Lists

The Property is listed as a RCRA NonGen/NLR site. A NonGen site does not presently generate RCRA hazardous waste but was previously a generator. No adjoining properties are listed. Further information regarding RCRA NonGen/NLR sites is included in the attached EDR report.

State and Tribal Agency Records

STATE AND TRIBAL AGENCY RECORDS			
Source	**Criteria for minimum search distance (miles)**	**No. of properties within search distance**	**No. of properties within a ¼ mile radius**
State/Tribal Equivalent NPL	1.0	0	0
State/Tribal Equivalent CERCLIS	0.5	2	0
State/Tribal SWLF	0.5	1	1
State/Tribal LUST/LAST	0.5	38	16
State/Tribal UST	0.25	28	28
State/Tribal Voluntary Cleanup Sites	0.5	1	0
State/Tribal Brownfield Sites	0.5	0	0
CT Spills	Subject Property Only	1	1
Drycleaners	0.15	1	1

State/Tribal Equivalent CERCLIS

State/Tribal Equivalent CERCLIS sites are characterized as State Hazardous Waste Sites (SHWS) which are identified as properties where releases of hazardous materials or petroleum have been reported to the CT DEEP. For the purpose of this report, due to proximity to the Property, SHWS sites within a ¼ mile radius are summarized below. Additional information on SHWS sites between ¼ and ½ radius of the subject property is summarized in the Executive Summary of the attached EDR report included in **Appendix A**.

There are two (2) State/Tribal Equivalent CERCLIS sites within a ¼ mile radius of the Property. A summary of the properties is as follows.

Property	Address	Direction/Distance (mi.)	EDR Map ID	EDR Page
Royal Business Machines	**1031 New Britain Ave.**	**SW (0.332 mi)**	**AE108**	**51**
The Yankee Stripper	**30 Sherman Street**	**SSW (0.476 mi)**	**206**	**58**

The listed Royal Business Machines is situated on the opposite side of Trout Brook from the Site. This site is listed CT DEEP spill site and voluntary remediation site due to the use, spills and leaking USTs involving metals, chlorinated VOCs, and petroleum. Due to distance and the fact that the river hydraulically isolates the Site from the Property, this site is not considered to represent a REC to the Property.

The listed Yankee Stripper is situated on the opposite side of Trout Brook from the Site. This site is listed as a CT DEEP spill site due to the use of chlorinated VOCs, acids, bases and other solvents to the on-site septic system. A consent order (HM-417) was issued to the Site. Due to distance and the fact that the river hydraulically isolates the Site from the Property, this site is not considered to represent a REC to the Property.

State/Tribal SWLF

CT SWF/LF: The Solid Waste Facilities/Landfill Sites records typically contain an inventory of solid waste disposal facilities or landfills in a particular state. The data comes from the DEEP's Inventory of Hazardous Disposal Sites.

A review of the CT SWF/LF list, as provided by EDR, and dated 08/01/2016 has revealed that the Property is listed as a CT SWF/LF.

Property	Address	Direction/Distance (mi.)	EDR Map ID	EDR Page
West Hartford Transfer Station	**25 Brixton Street**	**Target Property**	**D32**	**168**

The Property is identified as a transfer station operated by the Town of West Hartford and is identified as a CT SWF/LF site due to solid waste storage and handling operations including bulky waste and recyclables. This classification is a REC to the Property. Further information regarding the Property is included in the attached EDR report.

State/Tribal LUST, LAST

State/Tribal LUST, LAST sites are those within the State Release database that have an inventory of Leaking Underground Storage Tank incidents. Two (2) LUST/LAST sites are listed between 1/8 and ¼ radius of the subject Property and is summarized in the Executive Summary

provided on the attached EDR report included in **Appendix A**.

Property	Address	Direction/Distance (mi.)	EDR Map ID	EDR Page
West Hartford DPW	17 Brixton Street	NE (0.002 mi)I	A11	31
Safety Kleen	24 Brixton Street	NE (0.063 mi)	B23	86
West Hartford Dog Pound	38 Brixton Street	N (0.011 mi)	A16	54
Safelite Auto Glass	996 New Britain Ave.	S (0.177 mi)	J71	343
589 New Park Avenue	589 New Park Ave.	NNW (0.143 mi)	F52	294
CTDOT	642 New Park Ave.	WSW (0.164 mi)	G64	326
Doug Bleiler	579 New Park Ave.	NNW (0.172 mi)	H66	329
Property	**Address**	**Direction/Distance (mi.)**	**EDR Map ID**	**EDR Page**
~~Pep Boys Car Center~~	~~1000 New Britain Ave.~~	~~S (0.179 mi)~~	~~J79~~	~~366~~
Cunningham Supply	705 Oakwood Ave.	NE (0.180 mi)	K83	373
Wilcox Auto Body	988 New Britain Ave.	SSE (0.182 mi)	L88	382
Konover	983 New Britain Ave.	SSE (0.196 mi)	O106	430
GDP Enterprises	571 New Park Ave.	N (0.198 mi)	M109	439
W. Hartford Sunoco	956New Britain Ave	SE (0.231 mi)	T139	535
Intergal	183 Dexter Ave.	ENE (0.237 mi)	U146	549
Office Building	1030 New Britain Ave.	SW (0.248 mi)	V151	564
Fmr. Diamond Lumber	639 Oakwood Ave.	NNE (0.25 mi)	W153	571
949 New Britain Ave.	949 New Britain Ave.	ESE (0.261 mi)	155	574
Framingham Commence	635 New Park Ave.	W (0.272 mi)	X158	581
Sousa Corp	1045 New Britain Ave.	SW (0.278 mi)	Y159	587
Fmr. MACO	630 Oakwood Ave.	NNE (0.286 mi)	AA169	652
Anthony Realty Trust	139 Vanderbilt Ave.	NE (0.286 mi)	171	660
Pam Amazeen	32 South Highland St.	SSW (0.299 mi)	172	664
Savery Tool Co.	39 Talcott Rd.	NNW (0.302 mi)	AB174	668
Acme Auto Parts	540 New Park Ave.	N (0.326 mi)	AC178	678
Firehouse No. 3	1068 New Britain Ave.	WSW (0.331 mi)	AD179	681
On the Go Valeros	1 South Street	SW (0.332 mi)	AE181	697
AC Automotive, Inc.	1072 New Britain Ave.	WSW (0.346 mi)	AD185	715
Faxon Branch Library	1073 New Britain Ave.	WSW (0.358 mi)	189	732
Lilian Brown	25 Hurlbut Street	S (0.410 mi)	F191	736
US Post Office	121 Shield Street	SSE (0.413 mi)	AG193	742
St. Brigid Church	1088 New Britain Ave.	W (0.415 mi)	AH196	748
Mercury Fuel	888 New Britain Ave.	E (0.426 mi)	197	751
Fmr. Al's Mobile Station	522 New Park Ave.	NNW (0.432 mi)	199	759
Wiremold Co.	60 Woodlawn St.	SW (0.447 mi)	AI201	764
Mrs. Townstend	57 Woodlawn St.	WSW (0.453 mi)	AJ203	781
Elmwood Community Ice	1106 New Britain Ave.	W (0.468 mi)	205	786
Ed Page	55 Grant St.	ESE (0.486 mi)	207	791
Elm-Cap Industries	111 South Street	SSW (0.488 mi)	208	795

The listed West Hartford DPW is located adjacent to the Site (0.002 mi) to the north east. This site is listed a LUST site, however no information is available in the EDR report on the size of the leaking UST, the contents, the status of the UST or the response to the release. Due to the close proximity of the 17 Brixton Road Site to the Property this site is considered to represent a REC to the Property.

The listed Safety Kleen Site is a former TSDF located across Brixton Street from the Property (0.063 mi NE). The LUST is associated with a release of hazardous wastes stored at the Site. The Site was remediated and is in the Connecticut Property Transfer Act. Cleanup of the Site was performed under a consent order and stipulated judicial action with penalty. It is considered a REC to the Property because of the severity of the enforcement actions taken against the Site's owners, the potential for a hydraulic connection to the Property, the former storage of hazardous chemicals and the close proximity of this site to the Property. Further information regarding this site is included in the attached EDR report.

The listed West Hartford Dog Pound site is located adjacent to the northern boundary of the Property. The LUST incident occurred on this Site in April 2016 involving a release of heating oil. The size of the leaking UST or the amount released were not reported. Due to the Dog Pound's close location to the Property and the potential for a hydraulic connection this LUST site is considered a potential REC to the Property. Further information regarding this site is included in the attached EDR report.

The other listed LUST sites are either too far from the Property or have no potential for hydraulic connection to represent RECs to the property. Further information regarding these sites is included in the attached EDR report.

State/Tribal Registered UST

State/Tribal UST sites are those within the State Registered database. There are twenty-eight (28 UST sites listed within a ¼ radius of the subject Property.

Property	Address	Direction/Distance (mi.)	EDR Map ID	EDR Page
W. Hartford Transfer Sta.	**17 Brixton St.**	**NE (0.002 mi)**	**A13**	**49**
Dog Pound	**38 Brixton St.**	**N (0.11 mi)**	**A17**	**57**
Safety Kleen Systems	**24 Brixton Ave.**	**NE (0.63 mi)**	**B22**	**85**
Walton Company	**600 New Park Ave.**	**NW (0.111 mi)**	**C27**	**154**
Pontiac Center, Inc.	**612 New Park Ave.**	**W (0.116 mi_**	**E34**	**172**
Har-Conn Chrome Co.	**603 New Park Ave.**	**NW (0.120 mi)**	**C38**	**189**
Elisha Penniman, Inc.	**586 New Park Ave.**	**NNW (0.141 mi)**	**F50**	**292**
Presto-Hartford, Inc.	**585 New Park Ave.**	**NNW (0.154 mi)**	**F54**	**298**
Harte Elmwood Nissan	**631 New Park Ave.**	**WSE (0.162 mi)**	**G60**	**315**
CT DOT New Britain	**642-650 New Park Ave.**	**WSW (0.164 mi)**	**G63**	**324**
General Oil Co.	**650 New Park Ave.**	**WSW (0.176 mi)``**	**I70**	**341**
Penn Glass	**996 New Britain Ave.**	**S (0.177 mi)**	**J72**	**345**
Astna Building Products	**716 Oakwood Ave.**	**ENE (0.178 mi)**	**77**	**363**
Pep Boys Car Center	**1000 New Britain Ave.**	**S (0.179 mi)**	**J78**	**364**
Cunningham Supply, Inc.	**705 Oakwood Ave.**	**NE (0.180 mi)**	**K84**	**377**
Industrial Safety Supply	**574 New Park Ave.**	**WNW (0.181 mi)**	**H85**	**378**
Edgecomb Metals	**679 Oakwood Ave.**	**NE (0.185 mi)**	**K93**	**398**
AAMCO Transmissions	**989 New Britain Ave.**	**SSE (0.185 mi)**	**J92**	**396**

Connecticut Boiler	**694 Oakwood Ave.**	**NE (0.188 mi)**	**K95**	**400**
Elmwood Tire&Auto	**1012 New Britain Ave.**	**SSW (0.196 mi)**	**N104**	**428**
Hartford Electric Supply	**571 New Park Ave.**	**N (0.198 mi)**	**M107**	**437**
Capitol Tire Co.	**1009 New Britain Ave.**	**SSW (0.200 MI)**	**N110**	**245**
Jiffy Lube	**974 New Britain Ave.**	**SE (0.201 mi)**	**P114**	**451**
Meineke Discount Muffler	**1019 New Britain Ave.**	**SSW (0.220 mi)**	**R130**	**519**
West Hartford Sunoco	**956 New Britain Ave.**	**SE (0.231 mi)**	**T136**	**530**
On the Go	**1 South Street**	**SSW (0.238 mi)**	**R147**	**556**
1030 Building	**1030 New Britain Ave.**	**SW (0.248 mi)**	**V149**	**562**
Marjam Supply Co.	**639 Oakwood Ave.**	**NNE 0.250 mi)**	**W152**	**270**

The West Hartford Transfer Station site records pertain to the adjacent DPW facility. Information regarding the USTs at this site indicate that the following tanks were permanently closed:

- 1,000-gallon steel UST that contained used oil installed in 1978, closure date not reported
- Double walled 10,000 steel UST containing diesel fuel installed in January 1989, removed in December 1998.
- Double walled steel 15,000 gallon UST containing gasoline installed in July 1977 removed in September 1988.
- Steel 4,000-gallon UST containing gasoline installed in July 1965 removed in April 1991.
- Steel 8,000-gallon UST containing gasoline installed in July 1968, removed from ground on date unspecified.
- Steel 15,000-gallon steel tank containing gasoline installed in January 1950, removed in March 1992.
- Steel 4,000-gallon UST containing gasoline installed in July 1968 removed in April 1991.

The CT Spills records indicate that a release of diesel fuel was identified in December 1999 during removal of a 10,000-gallon UST. No further information is available on the status of these USTs. Due to the DPW site being adjacent to and potentially hydraulically upgradient of the Property and the lack of information available at the time that the USTs were closed, this site is considered to represent a potential REC to the Property.

The listed Dog Pound is located in close proximity to the northern boundary of the Property. This Site has a 275-gallon underground storage tank containing No. 2 heating oil that was installed in 1966 and removed in 1991. The Site currently has a 500-gallon UST in service that stores No. 2 heating oil for on-site consumption. Due to close distance and location hydraulically up gradient to the Property and the limited information available on the closed UST, this site is considered to represent a REC to the Property.

The listed Safety Kleen site is located across Brixton Street from the Property. Two 12,000-gallon steel USTs storing gasoline and installed in 1980 were permanently closed in February

1997. Due to close distance and location hydraulically up gradient to the Property, the limited information available on the closed USTs and the severity of environmental law violations recorded for this site, it is considered to represent a REC to the Property.

The other listed UST sites are not considered to represent RECs to the Property. These sites are situated at a great enough distance and are not expected to have a direct hydraulic connection to the Property. Further information regarding these properties is included in the attached EDR report.

CT Spills List

There is one (1) listing for the Property on the CT DEEP Spills list.

Date	Case #	Substance	Source	Description	Status
12/28/2004	**200408833**	**Petroleum**	**Tank**	**Tank removal/soil excavation**	**Closed**

Releases to the subsurface, during the removal of a tank in December 2004 November 1998 and April 1999 was identified. According to available information, remedial activities performed upon remove of the tank (it is not specified as an underground or aboveground tank) included the excavation and disposal of petroleum impacted soil. CT DEEP reportedly does not have any open case numbers for this Site. This incident represents a potential REC for the Property.

Additional Environmental Records

A list of Contaminated or Potentially Contaminated properties within the State of Connecticut is included in the EDR report. These represent 'hazardous waste facilities' as defined by the Connecticut General Statutes (CGS). This includes a summary of many of the listings included herein. There are forty-four (44) CT CPCS sites within a ¼ mile radius of the property. Of these sites, two are considered RECs for the Property.

Property	Address	Direction/Distance (mi.)	EDR Map ID	EDR Page
DPW Facility	**17 Brixton Street**	**NE (0.002 mi)**	**A7**	**23**
Safety Kleen	**24 Brixton Street**	**NE (0.115 mi)**	**D31**	**168**

Due to distance, location (up gradient vs. down or laterally gradient) and the information included herein, the DPW and Safety Kleen sites are considered RECs for the Property. The other sites listed in the EDR report are not considered RECs.

6.0 Subject Property Reconnaissance

The site reconnaissance was conducted by Mr. John Meyer, SES Project Manager, on August 2 and August 10, 2016. At that time of the August 2 inspection, the weather was cloudy with a temperature of approximately 72º F and intermittent showers. During the August 10 site visit the weather was cloudy, the temperature was approximately 78 degrees with intermittent showers developing into a steady rain. On August 2 access was provided to the entire interior Property except for the area below the incinerators, which was locked with a pad lock for which no key was available. On August 10, DPW staff cut the lock off to provide access to this area.

The following is a summary of visual and/or physical observations of the Property at the time of the inspection. Photographs of the property are included in **Appendix C**.

6.1 Site Inspection

The purpose of the inspection is to identify RECs defined by ASTM as the presence of any OHM on the Property under conditions that indicate the possibility of an existing release, past release of threat of release of any OHM into structures on the Property or into the ground, groundwater or surface water of the Property.

The Property reconnaissance consisted of visual and/or physical observations of the Property and improvements; adjoining sites as viewed from the Property or from curbside; and the surrounding area based on visual observations made during the trips to and from the Property. The building exterior was observed all around with no obstructions. The building interior was accessible and observed with the exception of a locked electrical room labeled "Danger High Voltage" for which no key was available.

The Property consists of developed land designated by the Town of West Hartford for general industrial use. The Property is further identified as Map 14 Block 701, Lot 17 by the West Hartford Assessor's office. The Property encompasses a total area of 2.48 acres of land and is improved with a 25,712 square foot building that was the Town's former municipal waste incinerator and solid waste transfer facility. Approximately 5,500 square feet of the building is occupied by the Town's used oil and battery recycling center drop off, scale house and break room/lavatory for the Town's lawn waste composting operations. The scale house and composting operation are operated by Supreme Forest Products under contact with the Town.

The remainder of the developed portion of the Property consists of a partially paved parking lot for employee vehicles, a paved driveway leading to and from the scale house area, a compost processing area, finished compost product storage bins and an enclosed sand/salt storage area.

Topography at the Property is higher to the south southwest and west, sloping down steeply to the north and at a moderate grade to the east and southeast. The lowest level of the Site is adjacent to and east of the lower maintenance area of the building. This area is approximately at the elevation of Brixton Street. Concrete block bins of finished compost material and a covered storage bin holding a sand/salt mix for use by Town residents are located in this lower area. The boundary of the Property is further depicted on **Figure 2**.

The area surrounding the Property to the southeast, south and southwest is used by the Town to store leaves, yard wastes (leaves and grass) and tree wastes (trunks and limbs). Tree wastes are reduced in volume and blended and mixed with soil and yard wastes to form compost and mulch products which are made available to Town residents and surrounding municipalities. The area to the northwest of the incinerator building is paved and contains a three story concrete block building used by the Town Fire Department for training. The paved area also contains abandoned vehicles used by the Fire Department for vehicle rescue training. The Town Dog Pound is located on the north side of the paved area. To the north of the Dog Pound is a wooded area that contains the remains of a rail siding and cement off-loading facility. The area to the north of the incinerator building contains a partially paved employee parking area and access roadway to the scale house.

To the north of Brixton street are several buildings. The western most is occupied by a pest control company. The next few buildings to the east are occupied by a landscaping company (Zysk Brothers) landscaping contractors. These building were formerly occupied by the Safety Kleen TSDF facility.

The exterior of the building was inspected, beginning with the stack area to the west. Flue gasses discharging from the incinerators to the stack passed through a narrow enclosed area whose sides are covered with broken suspected ACM transite panels. The interior of the smoke stack may be lined with ACM containing brick. The south side of the incinerator building was partially overgrown with vegetation. Fill has been placed against the southern overhead door leading down to the Ash Hopper Area. Piles of soil used in the composting process and bagged compost on pallets were stored in this area.

The east side of the building contained a set of three overhead doors leading to the maintenance area. The area outside the east side of building is occupied by concrete block bins storing finished compost material and a covered bin of salt/sand mix. The north side of the building contains the access ramp to the scale house and a partially paved parking area for employees. A pass door near the employee parking area gains access to the lower level of the building.
Electrical power enters the Property via overhead wires to a pole with a mounted transformer.

Power them passes below ground from the pole for approximately 50 feet before entering the building near the Ash Hopper Area's northern overhead door. The north Ash Hopper Area overhead door was covered with aluminum paneling and partially blocked by concrete blocks and fill. A natural gas meter was observed near the former overhead door, as was a vent pipe assumed to be associated with the heavy oil UST that supplied fuel to the incinerator furnaces. A small pile of broken tiles was located on the western edge of the employee parking lot. The source of these tiles is unknown. They may contain ACM.

Inspection of the building's interior began in the scale house and used oil and battery recycling drop of and collection area located on the second level of the building. The scale house is located on the northeast side of the building. To the west of the scale house office is a small break room and lavatory that has been renovated for the scale house and composting operations staff. The drop off and collection area contained a tank (estimated volume 500 gallons) for storage of used oil and two 55 gallon open-head drums for storage of small used batteries. A spill-containment pallet and wood palette contained used alkaline and lead acid batteries intended for recycling. A stonework display was between the battery storage area and the entrance to the scale house office.

A plywood partition separated the drop off and collection area from the former Waste Tipping Area. The former Waste Tipping Area was originally used to store trash intended for the incinerator furnaces. When the facility was converted to a transfer station, the floor was removed and steel hoppers installed that led to waste compactors on the lower level. These hoppers have since been filled in with sand. An observation window of a small office area is located in the center of the wall behind (west of) the former tipping area. The incinerator furnaces and associated equipment are located behind this wall on the same level.

The building inspection continued on the third level, one level above the incinerators (the Crane Deck). This area contained an overhead crane that was used to lift waste from the tipping floor and place it into hoppers located atop the incinerators. At the time of this inspection the hoppers contained either sand or ash, old furniture and trash. This area contained two old electric motors reportedly from the overhead crane, the crane bucket and two heating units mounted on the north and south sides of the west wall of the Crane Deck. Piping covered with suspected friable asbestos containing material (ACM) thermal insulation were present on piping of both heating units. Many of the windows in the Crane Deck area were broken. The floor was covered with bird guano. A 5-gallon pain of roofing asphalt was present in this area.

The second floor of the building was approximately level with the tipping deck. The northern portion of this floor contained the break room and lavatory for the scale house employees, a

small empty room that was the former facility superintendent's office, and a locker room and wash room/lavatory used by the incinerator and transfer station operations staff (these rooms are no longer in use). Glazing on the windows of this floor (including the Furnace Deck) may contain asbestos or PCBs. Several 5-gallon pails of roofing asphalt and roof lashing cement were present in this area.

The Furnace Deck is accessed by a short set of stairs (up) from the tipping floor area. The floor of the Furnace Deck consists of concrete and metal decking. Two waste incinerator furnaces and electrical control panels occupy the eastern portion of this area. The western side of the area contains the particulate emissions control apparatus which extends down to the level below. Much of the piping associated with the incinerator water and oil supply were covered in suspected friable ACM insulation, some of which was in poor condition, with some insulation fallen to the floor.

The furnace interiors contained approximately a cubic yard of ash each. Fire bricks lining the interior of the furnaces and may contain asbestos. Peeling paint covered most of the metal structure and concrete block walls within the Furnace Deck. This paint may contain lead. A remote tank fuel gauge on the southeastern side of the Furnace Deck indicated a capacity, when full, of 5,000. This gauge is assumed to be connected to the UST located below the Ash Hopper Area on the lower level. The gauge did not contain units, so it is uncertain if the fuel was measured in gallons or tons. Gas fired blowers that appeared to be flue gas afterburners were located on the particulate scrubbers. Incinerator control panels lined the east wall of the Furnace Deck area. These controls may include mercury containing electrical components or switches.

A set of stairs lead up from the Furnace Deck to a small (approximately 15 by 15 foot) office behind the observation window overlooking the tipping floor. This office contained two desks, a chair, and air conditioner, a mattress, trash and old papers.

The Ash Hopper Area was located below the incinerator deck and is accessed through a door on the North West side of the building's lower level. The Ash Hopper Area contained two overhead doors, one on the south and one on the north side of side of the building that allowed dump truck access to the ash hoppers located below the incinerators. Trucks would be positioned below the hoppers and the ash would drop in through the hopper doors. These doors have been blocked off and filled in from the outside so they are no longer visible from the exterior. This area contained the lower portion of the particulate scrubbers, the incinerator furnace oil supply pumps, and the hydraulic ram equipment that operated the transfer station trash compactors. Heavy oil staining was evident on the concrete mounting pads of the compactor's hydraulic pumps.

The floor of the Ash Hopper Area was covered with a thick layer of incinerator ash. Suspected friable ACM was present on many of the pipes. The northwest corner of the Ash Hopper Area contained a set of three oil pumps. Only one pump was present at the time of the inspection, two having been removed. Supply and return lines covered with suspected ACM insulation lead to and from the manifold supplying the pumps. To the east of the pumps two insulated hot water lines entered a collar set into the ground. It appears that these lines supplied hot water to the oil heaters to keep the heavy oil in a warm, flowable condition. Stockpiles of unused incinerator firebrick were stored in the eastern portion of the Ash Hopper Area.

The facility electrical control room was located on the lower floor of the building. This room was north and east of the incinerator and Ash Hopper Areas and contained several large rows of switch panels that controlled power to the incinerator equipment. A live transformer was located in this area. A locked door labeled "Danger High Voltage" was present in the west wall of the electrical control room. The room behind this door was not inspected due to its inaccessibility. A noticeable humming noise came from the locked room indicating that transformers may be present within.

A pump/furnace room was present below the electrical control room. This room contained what appeared to be a heating system for the personnel support portion of the facility. The floor of this room was damp, indicating that it may flood periodically. Piping wrapped with suspected ACM insulation was observed in this room.

The Maintenance Area is located on the lower level of the building below the former tipping floor. This area is currently used to maintain and store the heavy equipment used in the composting operation. According to Ray Brignano, former facility foreman, the floor of the maintenance area has been raised several feet to prevent flooding at times of high groundwater. A sump located in the northwest corner of the Maintenance Area has its bottom at the level of the former floor. Groundwater was flowing into this sump and exiting via a drain. The discharge point of the drain is not known. The maintenance area contained an AST of approximately 500-gallon capacity used to store diesel fuel for the composting heavy equipment. Minor staining was present on top of this AST.

The Maintenance Area contains a non-operational used oil-fired hot air heating system. An AST of approximately 300-gallon capacity supplied the heating equipment. Three plastic tote tanks belonging to the composting operation and ranging in capacity from 250 to 300 gallons were adjacent to the heating oil AST. These totes were empty but may have contained used oil that supplied the Maintenance Area's heating system. Oil staining was noted below the used oil AST. An open 30-gallon drum containing 10 to 15 gallons of what appeared to be used oil and

trash was present near the used oil AST. A number of small containers ranging in size from to 5 gallon pails and quart sized plastic containers were present in the maintenance area and contained lubricating oil, grease, paint and other products used in maintaining the composting equipment.

6.2 Oil and/or Hazardous Substance Use and Storage

The following is a summary of oils and/or other potentially hazardous materials observed within the facility during the site inspection.

Location	No./Container	Material	Condition
Drop Off Collection Area	1 AST	Motor Oil and used oil product	Good Condition
Drop Off Collection Area	Pallet 2 55-gallon drums	Used batteries, including alkaline and lead acid batteries	Good. No overt evidence of leakage or staining. No spill containment.
Maintenance Area	(2) ASTs	500-gallon Diesel fuel and 300-gallon heating oil/used oil	Fair. No Evidence of significant staining around the diesel AST. No spill containment. Oil staining was observed around the used oil AST.
Maintenance Area	(3) AST	Three plastic totes, 300 to 500 gallons,	Fair. No Evidence of significant staining. No spill containment
Maintenance Area	Approximately 1 dozen	Lubricants, penetrating oil, motor oil, grease and paint	Fair. No evidence of significant staining. One open 30-gallon container holding an oily liquid suspected to be used oil. No spill containment.
Below former Incinerators	(2) former trash compactors hydraulic ram equipment	Hydraulic Oil	Poor. Staining in the vicinity of the hydraulic pumps and storage tanks.

6.3 Storage Tanks

Evidence of a UST that stored fuel oil for the incinerator was identified in the northern portion of the room beneath the floor of the Ash Hopper Area. A rack holding a set of three oil supply pumps (one pump was present the other two has been removed) was located below a piping manifold. Insulated supply and return lines as well as insulated steam or hot water lines lead into the ground on either side of the pump. A tank level gauge located to the west of the pump rack read 7,000. A similar gauge located on the wall of the incinerator room (one level above) read zero, but has a scale range of zero to 6,000. The presence of thermal insulation of the return and supply lines indicated that heavy oil (either No. 4 or No. 6 oil) was used to fuel the incinerators. A vent pipe for this UST was located outside the building. No fill pipe could be found. Fill

placed outside this portion of the building may have covered over the fill pipe. It is not known if the tank is located inside or outside the building.

A 500-gallon AST (estimated capacity) storing diesel fuel for the composting operation's heavy equipment was observed in the Maintenance Area. Another AST of approximately 300-gallon capacity was observed next the Maintenance Areas' used oil-fired heating furnace. This AST is presumed to contain used oil. Oil staining of the concrete floor was observed beneath the used oil AST.

6.4 Polychlorinated Biphenyls (PCBs)

SES did not observe any evidence of the use or storage of PCBs on the Property. One transformer is located in the northern portion of the lower level of the building. No evidence of spills or leakage was observed around the base of the transformer. A locked electrical room with a sign indicating Danger High Voltage to which no access was available is located to the west of the electrical control room. A transformer may be also located in this room. Based on the date of construction, PCBs may be present in the transformer oil. PCBs may also be present in caulking around windows, doors, roof and wall penetrations and other areas of the building. The hydraulic compactors located beneath the incinerator floor were installed in the late 1970's. Hydraulic oil in the compactor ram system may contain PCBs.

6.5 Unidentified Substance Containers

A number of 5-gallon opened containers of roofing asphalt/flashing cement were observed in several locations in the building. A 30-gallon open container of oily liquid and trash, and approximately one dozen containers of paints and lubricants ranging in capacity from 5 gallon to 0ne quart were observed in the maintenance area, SES did not observe the presence of other unidentified substance containers on the Property.

6.6 Waste Generation, Storage and Disposal

The Town representative Mark Hallenbeck, indicated that used oil and used batteries are collected at the recycling center. Mr. Hallenbeck indicated that the heater in the lower maintenance area is designed to operate on used oil, but is not operational. Three empty 250 to 300-gallon plastic totes and a 300-gallon (estimated capacity) steel tank in the maintenance area may be used to store used oil for the heating system. Recent records pertaining to the shipping and recycling of used oil were not available at the time of inspection.

6.7 Sumps, Waste Pits, Ponds, and Lagoons

A sump was located in the southwestern corner of the maintenance area. Water flowing into this sump exited via a drain. The location of the drain discharge was not known.

During operation of the incinerator quench water from the particulate scrubbers discharged to a clarifier and a series of troughs that allowed entrained particles to settle before the effluent was discharged to the South Branch of the Park River. Sludge from the clarifier and the troughs was removed periodically and disposed of in the ash landfill.

6.8 Septic Systems

The Site is serviced by sanitary sewer. No septic system is known to exist.

6.9 Wells

State and Town records indicate that a non-potable water supply well may be located on the Property. This well may have been used to supply process water to the incinerator flue gas particulate scrubbers.

6.10 Interview with the Property Owner

On August 12, 2016 Ms. Kim Holden, Business Operations Manager for the DPW, completed an environmental questionnaire regarding her knowledge of the following: current and past use, treatment , storage, disposal or generation of hazardous substances, petroleum products and hazardous, regulated, or medical wastes; equipment that is known or likely to contain PCBs; storage tanks and drums; wells, drains and sumps; and pits, ponds or lagoons. A copy of the completed environmental questionnaire is included in **Appendix D**. Ms. Holden's answers were compared to the observations made by Mr. Meyer at the time of the inspection and information obtained from other sources as part of this ESA. Ms. Holden's answers were determined to be generally consistent with the observations and findings made with the exception of the following:

- Answer No. 11. Ms. Holden indicated that it was unknown if any vent or fill pipes were present on the Property. During his site reconnaissance, Mr. Meyer observed a vent pipe outside the northwest corner of the Ash Hopper Area near the suspected location of the heavy oil UST.
- Answer No. 12. Ms. Holden indicated that it was unknown if any staining of flooring, drains or wall was present on the Property. During his site reconnaissance, Mr. Meyer observed heavy oil staining on hydraulic equipment and concrete mounting pads of the former trash compactor systems and staining on the floor of the Maintenance Area in the vicinity of the used oil AST.
- Answer No. 18. Ms. Holden indicated that it is unknown if the Property discharges wastewater other than storm water on or adjacent to the Property. In an interview with former Facility foreman Ray Brignano, it was determined that the incinerator operation

formerly discharged clarified quench water to the South Branch of the Park River. During his site reconnaissance investigation groundwater was observed discharging into a sump located in the southwest corner of the maintenance area. The point of discharge of the sump drain is unknown.

Mr. Meyer conducted his second, August 10, 2016 reconnaissance of the Property in the company of Mr. Raymond Brignano, former Incinerator Foreman, and Mark Hallenbeck, DWP Manager of Traffic Safety who formerly worked at the Incinerator. Mr. Brignano indicated that the Property had formerly been a clay mine for a brick making operation that ceased in the 1930's or earlier. After the Town purchased the Property, the brick pits were used for disposal of municipal solid waste including industrial, commercial and residential waste streams. He indicated that the brick pits may have been as deep as 100 feet below the former site grade. Food wastes were segregated out from the land filled waste stream and provided to pig farmers. Once the incinerator was operational in the late 1950's ash from the incinerator was placed over the solid waste. He indicated that the majority of the ash disposal area surrounding the Property was not capped with soil. Ash and solid waste removed from the ground during construction of the adjacent DPW garage was placed on the higher portion of the Site located to the west of the incinerator building.

He indicated that heavy oil was used to fire the incinerators intermittently, particularly when the solid waste had a high moisture content. The oil tank was located beneath the floor, or immediately outside of the north portion, of the Ash Hopper Area.

Mr. Brignano confirmed that particulate scrubbers were installed in the early 1970's to reduce the concentration of particulates in the on the incinerator furnace flue gas. These scrubbers used natural gas burners in their process. The scrubbers used a water quench system to settle fly ash from the flue gas. The water supply for the quench system was the South Branch of the Park River. Quench water discharged to a clarifier and settling trough system then discharged back to the South Branch of the Park River. Sludge from the clarification process was disposed of in the ash landfill.

According to Mr. Brignano, the incinerator was converted to a transfer station during the late 1970's. The hydraulic compaction system was installed at that time. During installation of the compaction system, the floor of the tipping area was raised by approximately four feet.

Mr. Hallenbeck indicated that the heating system in the maintenance area was fueled with used oil and was non-operational. He indicated that the composting operation was planning to have the used oil AST emptied by a qualified contractor.

7.0 Summary of Findings and Conclusions of the Phase I ESA

SES performed a Phase I Environmental Assessment of the Subject Property in conformance with the scope and limitations of ASTM Practice E 1527-13. A summary of our Findings and Conclusions are presented as follows:

7.1 Summary of Findings

Report Component	Summary of Findings
Subject Property Characteristics	The Property consists of developed land designated by the Town of West Hartford for general industrial use. The Property is further identified by the Town of West Hartford Assessor's Office as Map 14, Block 701, Lot 17. The Property encompasses approximately 2.48 acres of land with one former solid waste incinerator that is currently being used as a scale house for a large scale composting operation and a drop off center for Town residents to recycle used oil and used batteries. The incinerator building consists of 25,712 square feet and consists of a scale house and former tipping floor, Crane Deck, Furnace Deck, Ash Hopper Area, Electrical Control Room, Pump and Boiler Room, Maintenance Area, Locker and Wash Room, Break Room, lavatories and several small offices. The brick incinerator exhaust stack is located to the west of the building and is approximately 100 feet high. The remainder of the Property consists of a partially paved parking area, a paved access ramp to and from the scale house, an unpaved area to the east of the building used to store finished compost products and a and salt mix for resident use, and the Town's active brush a yard waste composting operation to the south and north of the building. The West Hartford DPW offices and maintenance /storage facility are located immediately to the east of the Property. The West Hartford Fire Department Training Area and Dog Pound are located adjacent to the property to the northwest. The area to the south, east and west of the property is used by the Town for a large scale yard waste and woody waste composting operation. A pest control company and a landscaping contractor are located to the northeast across Brixton Street. The landscape contractor occupies the buildings and grounds of the former Safety Kleen TSDF operation. Properties to the northeast and east of the Property are all used for commercial or industrial operations. Underground water, sewer and natural gas is available to the Property and surrounding properties. Cable, telephone, and electrical utilities are aboveground.
Standard Historical Record Research	No records of prior buildings have been found for the Property prior to the construction of the existing incinerator in 1959. Municipal records, Historical Aerial Photographs, USGS Maps and interviews with knowledgeable persons support that the Property was used as a clay mine for brick making operations prior to the 1930's. After the Town purchased the property in 1937 it began disposing of municipal solid waste in the flooded brick pits. After construction of the incinerator, incinerator ash was placed over the solid waste. The incinerator was shut down in the late 1970's at which time the Town converted the building to a transfer station. Waste transfer operations ceased in the late 1980's to early 1990's when municipal waste hauling was privatized and municipal solid waste was disposed of at the CRRA incinerator facility in Hartford. RECs were identified from the Historical Research. One unregistered underground storage tank (UST) is suspected to be located on the Property. The USTs contained heavy oil used to fuel the incinerators. The capacity of the UST is approximately 5,000 to 7,000 gallons based on tank gauges found within the building. The precise location and condition of this UST is unknown. Two ASTs are present in the building's Maintenance Area, one 500-gallon AST storing diesel fuel and one 300-gallon AST storing used oil for the Maintenance Area's heating system. Three plastic totes ranging from 250 to 300 gallons also apparently stored

	used oil in the maintenance area. One AST approximately 500 gallons in size was used to store collected used oil in the second floor use oil collection drop-off area. A number of registered USTs, including a leaking 15,000-gallon gasoline tank were located on the adjacent DPW facility site. These USTs were removed. A 275 gallon UST containing No. 2 heating oil was removed from the adjacent Dog Pound and replaced with a 500-gallon UST. A number of USTs containing oil and hazardous wastes were removed from the former Safety Kleen facility located north of the Property across Brixton Street. Surficial oil staining of the concrete floor in the Maintenance Area was observed around the used oil AST. Oil staining was also observed in the Ash Hopper Area surrounding the former trash compactor hydraulic equipment mounting pads.
Federal, State and Local Agency Concerns per Governmental Records Search Database	Records and databases indicate do not contain records of a registered USTs on the property. A number of adjacent Sites have had known releases of petroleum or hazardous materials to the subsurface that required notification and response actions. Based on location and distance RECs associated with these incidents were identified a 38 Brixton Street (Dog Pound), 24 Brixton Street (Safety Kleen) and 17 Brixton Street (DPW).
Subject Property Reconnaissance	The Property consists of developed land designated by the Town of West Hartford for general industrial use. The Property encompasses a total area of 2.48 acres of land has one (1) 25,712 square foot incinerator building that is partially unoccupied and a large brick smoke stack. The occupied portion of the building consists of the Town's used oil and batter drop off and collection area, a scale house and maintenance area for the Town's yard waste composting operation and lavatories and break room for the recycling and composting operation's employees. The remainder of the building contains defunct equipment and facilities associated with the former incinerator operations. Topography at the Property is approximately 30 feet higher to the west than to the east. To the north of the building, the Property consists of a partially paved employee parking lot and paved access drive way to the scale house. The area to the east of the building is at a lower grade than the rest of the property and is used to store finished compost products and a salt/sand mix for use by Town residents. The areas to the south and west of the building are at a higher grade than the rest of the property and are used for composting and woody waste volume reduction. The area to the north west of the building is at a lower elevation and is used by the Town Fire Department as a fire fighter training area. The eastern portion of the building is occupied on the lower level by the composting facility maintenance and storage area. This area contained a non-functioning used oil fired heating unit that served the Maintenance Area. A 500-gallon diesel fuel AST, 300-gallon used oil AST and three empty totes in the 250 to 300-gallon range (all capacities estimated) were present in this area. An open 30-gallon plastic drum was present that contained approximately 10 gallons of used oil and trash. Staining of the concrete floor was evident beneath the 300-gallon used oil AST. A number of small containers of grease, lubricating oil, and paint ranging from 5 gallons to one quart were present in the maintenance area. The second level contained the scale house and used oil/used battery recycling drop off area. A tank of approximately 500-gallon capacity and two 55-gallon drums were present in the used oil collection area whereas a number of batteries, including automotive lead acid batteries were present in the battery collection drop off area. No significant staining was noted. A wood partition separated the recycling drop off area from the former tipping floor of the transfer station compactor hoppers. The western portion of the building contains the incinerators, flue gas scrubbing system and support facilities (electrical and pump rooms, locker room, break room and lavatories). The uppermost level is the Crane Deck and contains an overhead crane and grapple that was used to move waste from the tipping area to two hoppers feeding the incinerators. Many of the windows in the Crane Deck Area were missing, and the floor was covered in bird guano. Two sets of hot water/forced air heating units were attached to the west wall of the Crane Deck. Piping on the

heater was wrapped with suspected ACM thermal insulation. Several large motors, reported to belong to the crane, were on the floor. Several 5-gallon pails of roofing asphalt and flashing cement were observed in these areas.

The second level of this portion of the building contained the furnaces and associated controls, burners and mechanical equipment and the upper portion of the flue gas scrubbers. Remnant ash was present inside the incinerator furnaces. Fire brick lining the interior of the furnaces may contain asbestos. Oil and hot water piping was wrapped in thermal insulation that is suspected to contain asbestos. In several areas the insulation was in poor condition and has fallen to the floor. The furnaces were fueled by oil, although burners located on the flue gas scrubbers were fueled by natural gas. A fuel gauge was located on the north side of the incinerator deck indicated a maximum fuel capacity of 5,000 gallons. This gauge is assumed to be connected to the heavy oil UST. Most of the metal surfaces and concrete walls were covered with flaking paint that may contain lead. A stairway leads up to a small observation/office area that overlooked the tipping area. Windows throughout the building were glazed with putty that may contain asbestos or PCB.

The lower level contained the Ash Hopper Area. Although this area is no longer accessible by vehicle, overhead doors on the south and north side of the area allowed trucks to enter and receive ash from the incinerator via hopper doors on the bottom of each furnace. This area contained the pumps used to supply the furnaces with heavy oil. Insulated piping leading into the ground in the northwestern portion of the area and a fuel gauge mounted on the wall indicated the approximate location of the heavy oil UST. A gauge mounted on the wall indicated the UST was full at a capacity of 7,000. The majority of the thermal insulation appeared to consist of suspected ACM.

The east side of the Ash Hopper Area contained two large hydraulic trash compactors that were installed in the late 1970's when the building was converted to a waste transfer station. Oil staining was noted around the concrete mounting pads of these compactors. Metal surfaces and concrete walls throughout the ash hopper and furnace area were covered with peeling paint that may contain lead. Several stockpiles of unused fire brick were present in the eastern portion of this area. The floor in the western portion of the area was covered with a thick layer of incinerator ash.

The northern portion of the building adjacent to the Furnace Deck contained a locker room and wash room/lavatory on its upper level, a break room and lavatory used by current scale house employees on the tipping floor level and an electrical room on the lower level. The electrical room contained a transformer, switch gear to inoperative incinerator equipment and a room labeled "Danger High Voltage" that was not inspected. No staining was noted around the transformer or switch gear. A partially flooded sub-level contained a combined pump/boiler room. Some of the piping associated with the boiler as wrapped in suspect ACM. Several 5-gallon buckets of asphalt roofing material were observed in this area

Inspection of the building's exterior identified and natural gas meter on the exterior of the Ash Hopper Area's north wall. A UST vent pipe was also identified in this area. A narrow section of the building that surrounded the flue piping connecting the scrubbers to the brick smoke stack was sided with suspected transite ACM siding.

RECs were identified during the site reconnaissance performed on August 2 and 10, 2016.

7.2 Significant Data Gaps

Significant data gaps include missing or unattainable information that affects the ability of the environmental professional to identify conditions indicative of releases or threatened releases of hazardous substances, and as applicable, pollutants and contaminants, petroleum or petroleum products, or controlled substances, on, at, in, or to the subject property. Significant data gaps identified during the performance of this Phase I ESA include:

- The CT Spills records indicate the removal of a number of USTs containing diesel fuel, gasoline and waste oil on the adjacent DPW property. A release of diesel fuel reported in December 1999 during removal of a 10,000-gallon UST. No information was available to indicate if the reported release was cleaned up to meet applicable soil and groundwater standards. No information is available on whether contamination was identified during removal of the other USTs.

- Significant data gaps exist regarding the shipping of regulated hazardous wastes from the Property. This data gap specifically references two episodic shipments of hazardous waste in excess of 100 kg/month but less than 1,000 kg/month that classify. One shipment was in February 1998 for 75 gallons on DOO1 wastes consisting of an ignitable mix of gasoline and water. The other shipment was in December 1987 for 150 gallons of a DOO1 Ignitable mixture of gasoline and water. No USTs containing gasoline are reported to have been present on the Property. It is possible that these wastes were generated from the DPW garage facility (which is listed at a SQG) rather than the incinerator. Verification of the point of generation of this waste is required to determine the status of the Site as a hazardous waste generator.

- Used oil and used batteries are collected at the recycling center located on the Property. Documentation that these materials are being shipped from the Property for reuse is required to verify the Properties status as a hazardous waste generator.

- The point of discharge for the drain in the sump located in the incinerator building maintenance area is required to determine the regulatory status of the Property under the National Pollution Discharge Elimination System (NPDES) regulations.

7.3 Conclusions

Results of the Phase I Environmental Assessment have identified a number of

potential Recognized Environmental Conditions (RECs) at the Property and adjacent properties. Potential RECs identified are as follows:

- Disposal of solid waste and incinerator ash on the Property and surrounding areas.
- Operation of a used oil and used battery drop of and collection area on the Property, with the potential for spills and releases of used oil during transfer to the heating system AST located in the Maintenance Area.
- Full and partially full containers ranging from quart size to 30 gallons that were observed in several parts of the incinerator building, including the Crane Deck, the support area north of the Furnace Deck and in the Maintenance Area.
- Empty and partially filled plastic totes ranging from 250 to 300-gallon capacity that were present in the Maintenance Area.
- Current and historical use or storage of oil, used oil, and/or potentially hazardous materials within the Maintenance Area. Staining of the concrete floor was observed in the immediate vicinity of the used oil AST;
- The suspected presence of an unregistered heavy oil UST with an estimated capacity between 5,000 and 7,000 gallons beneath or adjacent to the north side of the Ash Hopper Area;
- A heavy concentration of bird guano on the Crane Deck;
- Leaking hydraulic oil from the waste compaction equipment located on the east side of the Ash Hopper Area;
- Peeling suspected lead based paint on concrete and metal surfaces throughout the western portion of the building;
- Suspected ACM thermal insulation on piping throughout the western portion of the building;
- Suspected ACM or PCB caulk and glazing throughout the building;
- Suspected ACM transite siding covering the portion of the building enclosing the flue discharging from the scrubbers to the smokestack;
- Suspect ACM firebrick within the furnaces and stockpiled in the Ash Hopper Area;
- The potential for PCB and mercury containing electrical equipment in facility controls and switch gear and PCBs in facility transformers;

Due to close proximity, location (potentially upgradient), of three nearby properties represent potential RECs. These include the Dog Pound, the DPW Maintenance Facility and the Former Safety Kleen TSDF facility. A review of Federal Databases revealed the documented use and/or release of oil or hazardous materials at each location. A release of gasoline to subsurface soil and groundwater identified during the removal of one 15,000 gallon UST on the adjacent DPW

property. A potential release of home heating oil was identified during the removal of one 275-gallon UST from the Dog Pound.

Releases of oil and hazardous materials, contamination of soil and groundwater and a significant enforcement action that terminated TSDF operations was documented at the former Safety Kleen TSDF facility located across Brixton Street from the Property.

Based on the results of the Phase I ESA, a Hazardous Building Material Assessment (HBMA) and a Phase II subsurface investigation is recommended to evaluate potential RECs identified above. Since the purpose of the Phase I investigation was to evaluate the Property in advance of demolishing the incinerator building, it is recommended that the scope of the Phase II investigation focus on soil and groundwater in areas that may potentially be disturbed during building demolition.

8.0 Opinion on the Applicability of the Connecticut Transfer Act to the Property

The Connecticut Property Transfer Act (CTA) Program, administered by the Remediation Division of the Bureau of Water Protection and Land Reuse, requires the disclosure of environmental conditions when ownership of certain real properties and/or businesses meeting the following characteristics of an "establishment" as defined in the Act are transferred.

> Establishment means *any real property at which or any business operation from which*: (A)on or after November 19, 1980, there was generated, except as the result of remediation of polluted soil, groundwater, or sediment, more than one hundred kilograms (220 pounds) of hazardous waste in any one month (defined under the Resource Conservation and Recovery Act [RCRA] as a Small Quantity Hazardous Waste Generator [SQG]); (B) hazardous waste generated at a different location was recycled, reclaimed, reused, stored, handled, treated, transported, or disposed of; (C) the process of dry cleaning was conducted on or after May 1, 1967; (D) furniture stripping was conducted on or after May 1, 1967; or (E) a vehicle body repair facility was located on or after May 1, 1967.

All transfers of establishments require an investigation of the parcel in accordance with prevailing standards and guidelines to evaluate the parcel's environmental condition

The property clearly does not meet the characteristic of C through E above and is not listed in the EDR Database report as a SQG. The EDR Database report indicates records of manifests for two shipments of characteristically hazardous D001 (Ignitability) waste from the Property described as waste gasoline and water. The first shipment was 150 gallons (417 kilograms) and occurre d in December of 1987. The second shipment was 75 gallons (283 kilograms) and occurre d in February 1988. A discussion held with the former Incinerator facility foreman Ray Brignano indicated that those shipments were not waste generated from activities at the Property, but were for waste generated during cleaning of USTs on the former Street Department facility whose address is currently 17 Brixton Street. The 17 Brixton Street site is listed in the EDR report as a SQG (EPA ID CTD982777765) whereas the 25 Brixton Street site is not. A search of the EPA RCRA info data base did not identify the Site as an active or inactive RCRA waste generator. If the two waste shipments were the result of remediation or were from activities located off the Property, the Property would not be subject to the requirements of the Transfer Act.

A center for drop off and collection used oil and batteries operates on the Property. Under RCRA, hazardous materials that are reclaimed and used beneficially are exempted from classification as hazardous waste. Used batteries collected at the Property are recycled and are not therefore a hazardous waste under RCRA or the Connecticut hazardous waste regulations. As long as the used oil is managed in accordance with the Connecticut Used Oil Regulations and either recycled or burned to recovery energy it is also not considered to be a hazardous waste.

If the episodic hazardous wastes generation in excess of 100 kg per month was associated with remediation activities or was due to activities located on an adjacent parcel, the CTA would not currently apply to the Property. The reason for, and point of, generation of these wastes requires clarification to determine the applicability of the Transfer Act to the Property. It should be noted that improper management of the used oil and battery collection operation could result in generation of hazardous wastes in excess of 100 kg/month resulting in the Property being defined as an Establishment.

9.0 Recommendations

SES performed Phase I Environmental Site Assessment and Investigation at the Property. A number of potential RECs, including potentially hazardous building materials and activities that may have the potential to impact soil and groundwater were observed on the Property, including disposal of municipal solid waste and incinerator ash, open or unused containers of petroleum and unknown materials, a suspected UST, several ASTs, collection, storage and shipment of used oil and batteries, disposal of floor tile, and storage of petroleum based fuels. RECs associated with surrounding properties include disposal of municipal solid waste and incinerator ash, leaking USTs, a current SQG, and a former TSDF that was shut down due to numerous violations of hazardous waste regulations. Our recommendations are as follows:

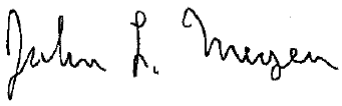
- Identify and remove contents of containers of materials that are not being actively used in building operations, maintenance or recycling activities, and recycle or dispose of their contents;
- Evaluate the floor tile disposal area located near the lower employee entrance and removed this material from the Property for proper disposal;
- Empty and properly dispose of oil remaining in the trash compactor hydraulic system and the used oil AST. Analysis of these materials should be performed prior to removal to determine if they can be recycled or require disposal as hazardous wastes;
- Clarify the generation of hazardous wastes that took place in December 1987 and February 1988 to determine the activity and location associated with their generation;
- Conduct a hazardous building materials assessment of the incinerator building;
- Conduct a geophysical survey of the northwestern corner of the Ash Hopper Area to determine the presence, size and orientation of the suspected heavy oil UST.
- Conduct a Phase II investigation of portions of the Property that may be disturbed during demolition of the building.
- Should a determination as to the regulatory status of the site with regard to the CT Transfer Law be desired, legal counsel should be consulted.

10. Qualifications and Signatures of Environmental Professional

I declare that, to the best of my professional knowledge and belief I meet the definition of Environmental Professional as defined in 40 CFR 313.20.

I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in conformance with the standards and practices set for the in 40 CFR Part 312.

My resume, which summarizes my education, training and experience is attached as Appendix E.



John L. Meyer
Licensed Environmental Professional