

# PHASE I ENVIRONMENTAL SITE ASSESSMENT

**Old Dalton Hardwood  
North Street  
(Map 215, Lot 13)  
Dalton, MA**



**November 2018**

**TRC Project No: 293334.PETRO.20001**

Prepared For:

Berkshire Regional Planning Commission  
1 Fenn Street  
Pittsfield, MA

On Behalf of:

Town of Dalton  
462 Main Street  
Dalton, MA

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## EXECUTIVE SUMMARY

Subject to the qualifications and limitations stated in Section 1 of this report, TRC Environmental Corporation (TRC) was retained by the Berkshire Regional Planning Commission (BRPC) (also known as “Client”) on behalf of the Town of Dalton (Town/User) to perform a Phase I Environmental Site Assessment (ESA) of the Old Dalton Hardwood facility located on North Street (Map 215, Lot 13) in Dalton, Berkshire County, Massachusetts (herein referred to as the “Site”). TRC’s assessment was conducted in connection with the Town’s planned redevelopment of the Site. The Phase I ESA described in this report was performed in accordance with the scope and limitations of the American Society of Testing and Materials Practice E 1527-13 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (ASTM E 1527-13). Limiting conditions and/or deviations from the ASTM E 1527-13 standard are described in Sections 1.3 and 7.5 of this report.

The approximately 9.5-acre Site is located on North Street (Map 215, Lot 13) in Dalton, Berkshire County, Massachusetts, in a rural area with a few small commercial and residential structures in the area. The Site is described by the Town of Dalton tax assessor as Map 215, Lot 13, is zoned as R4 residential, and is currently owned by Town of Dalton. A Site location map is included as **Figure 1**. The 9.5-acre Site is currently vacant land with one garage structure in poor condition and a visible foundation of a former house.

As a result of the Phase I ESA, including but not limited to our visual observation of the Site; review of historical information, environmental databases, and information provided by the User; interviews with current Site representative(s); and TRC’s professional judgment, the following *recognized environmental conditions* (RECs) and/or *controlled recognized environmental conditions* (CRECs) associated with the Site, as defined by the ASTM E 1527-13 standard were identified:

### Recognized Environmental Conditions (RECs)

#### REC No. 1

During the Site visit, information was provided regarding oil was sprayed on the dirt road for dust suppression during former Site operations. Although no oil was observed along the access road on the Site, the potential exists for oil contamination to be present along the dirt road that runs through the Site and/or under the existing pavement under the access road in the southern portion of the Site. This would constitute the REC by the potential presence of hazardous materials in the environment. Depending upon the duration, amount, and frequency of oil application, the REC may be associated with potential soil and/or groundwater contamination.

#### REC No. 2

During the Site visit, TRC observed a vent pipe along the southeast corner of the garage on the Site. TRC believes a UST may be present near this location, possibly located in front of the garage near the southeast corner of the building due to the lack of large trees in this area. No

additional information was reviewed that indicated the contents, size, or age of this suspected UST. The potential exists for the assumed contents of petroleum in the UST may have impacted the subsurface conditions at the Site which would constitute a REC.

This Executive Summary is part of this complete report; any findings, opinions or conclusions in this Executive Summary are made in context with the complete report. TRC recommends that the User read the entire report for all supporting information related to findings, opinions and conclusions.

### **Legal Notice**

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## 1.0 INTRODUCTION

TRC Environmental Corporation (TRC) has prepared this Phase I Environmental Site Assessment (ESA) for the Town of Dalton (Town/User) using EPA Brownfield Assessment grant funding through the Berkshire Regional Planning Commission (BRPC).

This report was prepared for and may be relied upon by Client for the purposes set forth herein; it may not be relied on by any party other than the Client and reliance may not be assigned without the express approval of TRC. Authorization for third party reliance on this report will be considered by TRC if requested by the Client. TRC reserves the right to deny reliance on this report by third parties.

### 1.1 Purpose and Scope of Services

The following Phase I ESA was performed for the property located on North Street (Map 215, Lot 13) in Dalton, Berkshire County, Massachusetts (hereinafter the “Site”). A Site location map is included as **Figure 1**. This Phase I ESA has been prepared by TRC in accordance with the American Society for Testing and Materials E 1527-13 *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process* (ASTM E 1527-13) and is intended for the sole use of Client/User (*MassDEP approval of the use of EPA Brownfield petroleum grant funding received on September 12, 2018*).

The purpose of this assessment is to identify *Recognized Environmental Conditions* (RECs) at the Site, as defined by the ASTM E 1527-13 standard. The completion of this Phase I ESA report may be used to satisfy one of the requirements for the User to qualify for the *innocent landowner, contiguous property owner, or bona fide prospective purchaser* limitations pursuant to the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), thereby constituting *all appropriate inquiries into the previous ownership and uses of the property consistent with good commercial or customary practice* as defined by 42 U.S.C. §9601(35)(B) of CERCLA.

The Scope of Services for this Phase I ESA included the following tasks:

- Site and vicinity reconnaissance;
- Site and vicinity description and physical setting;
- Historical source review and description of historical Site conditions;
- Interviews with owners, operators, and/or occupants of the Site, and/or local officials;
- Review of environmental databases and regulatory agency records;
- Review of previous environmental reports/documentation, as applicable;
- Review of environmental liens, if provided or authorized to obtain by the User; and
- Preparation of a report summarizing findings, opinions and conclusions.

Pursuant to the ASTM E 1527-13 standard, recommendations to conduct Phase II sampling or other assessment activities are not required to be included in this report. TRC can provide such recommendations upon request.

## 1.2 Additional Services

Items outside the scope of the ASTM E 1527-13 standard include, but are not limited to, the following:

- Asbestos-containing building materials
- Radon
- Lead-based paint
- Lead in drinking water
- Wetlands
- Regulatory compliance
- Cultural and historic resources
- Industrial hygiene
- Health and safety
- Ecological resources
- Endangered species
- Indoor air quality unrelated to *releases of hazardous substances or petroleum products* into the environment
- Biological agents
- Mold

No additional services were performed outside the scope of the ASTM E 1527-13 standard.

## 1.3 Deviations to ASTM E 1527-13 Standard

Notwithstanding additions to the ASTM E 1527-13 standard, as listed in Sections 1.2 and 9, if applicable, no significant deviations or deletions to the ASTM standard were made during this Phase I ESA.



## 2.0 SITE DESCRIPTION

### 2.1 Site Location and Legal Description

The approximately 9.5-acre Site is located on North Street (Map 215, Lot 13) in Dalton, Berkshire County, Massachusetts, in a rural area with a few small commercial and residential in the general vicinity. The Site is described by the Town of Dalton tax assessor as Map 215, Lot 13, is zoned as R4 residential, and is currently owned by Town of Dalton. A Site location map is included as **Figure 1**.

### 2.2 Site Improvements

Current on-site improvements are listed in the following table. A Site plan depicting historic site features circa 2014 is provided as **Figure 2**. A Site layout plan is included as **Figure 3**.

**Table 2.1 - Site Improvements**

Site Feature	Description
Buildings (stories)	One single-story former garage with two service bays located in the southwestern portion of the Site
Construction date(s)	c. 1950
Exterior areas	Mostly unpaved and vegetated, except the access driveway which is paved from North Street up to the garage
On-site roads/rail lines	N/A
Other large equipment	N/A
Potable water supply	None currently. Reported historic on-site production well – location is unknown and if it currently exists
Sewage disposal system(s)	None currently. Reported historic on-site septic system – location is unknown and if it currently exists
Heating/Cooling system fuel source(s)	None currently. Formerly heating oil via one suspected UST near the southeast corner of the garage and via former ASTs near the former saw mill operations near the central portion of the Site.
Back-up fuel source(s)	N/A
Electricity supplier(s)	Electrical lines were present during the Site visit. Electricity provider is Eversource.
Storm water system	N/A

### 2.3 Current and Historical Site Use

#### 2.3.1 Current Site Use(s)

The approximately 9.5-acre Site is currently vacant land with one structure (garage) in poor condition and a foundation from a former house adjacent to the garage.



### 2.3.2 Previous Owner and Operator Information

Based on information provided by the User (Section 3), the historical record review (Section 4), and/or interviews conducted during this Phase I (Section 6), historical Site ownership and operator information is provided in the tables below.

**Table 2.2 - Previous Owner Information**

Site Owner	From	To
Tenant Unknown	c. 1886	Unknown
J. Edgar Bardin	Unknown	9/11/1958
Harrison Family	9/11/1958	2/6/1963
Harrison Family	2/6/1963	12/18/1985
Harrison Family	12/18/1985	3/6/1989
Casey Harrison	3/6/1989	2/24/2014
Town of Dalton	2/24/2014	Present

**Table 2.3 - Previous Operator Information**

Site Operator	Description	From	To
Tenant Unknown	Vacant land (agricultural use)	c. 1886	Unknown
J. Edgar Bardin	Staging yard with several structures.	Unknown	9/11/1958
Harrison Family	Staging yard with several structures.	9/11/1958	2/6/1963
Harrison Family	Staging yard with several structures.	2/6/1963	12/18/1985
Harrison Family	Staging yard with several structures.	12/18/1985	3/6/1989
Casey Harrison	Staging yard with several structures. c. 1990s, vacant land with three small structures.	3/6/1989	2/24/2014
Town of Dalton	Vacant land with one structure (garage) and the foundation of a former house adjacent to the garage.	2/24/2014	Present

### 2.4 Physical Setting

According to the United States Geological Survey (USGS) topographic map, Peru, MA quadrangle dated 2012 (**Figure 1**), the Site is located approximately 1,000-feet northwest from Weston Brook (that empties into Windsor Reservoir located southeast of the Site), the Site topographic elevation is approximately 1,431 feet above mean sea level (MSL), and local topography slopes to the south. The topographic downward slope observed at the Site during the Site reconnaissance confirms the slope is generally towards the south. Based on local topography and the assumed direction of shallow ground water flow is to the south-southeast, towards the Weston Brook. However, a subsurface investigation would be required to determine actual ground water flow direction.

The database radius report supplied by Environmental Data Resources, Inc. (EDR) of Shelton, Connecticut was reviewed to obtain information regarding the dominant soil composition in the Site vicinity. This information is summarized below:

Hydric Status:	Partially hydric soil.
Soil Surface Texture:	Fine sandy loam
Soil Component Name:	Merrimac
Deeper Soil Types:	Sandy loam and stratified gravelly sand

Please refer to the Geocheck Physical Setting Source Summary of the EDR report presented in **Appendix A** for further information regarding the soil composition in the Site vicinity. According to EDR and MassDEP's Priority Resource Map (**Figure 4**), the Site is not located within any mapped areas but is surrounded by protected open space except to the east.

### **3.0 USER PROVIDED INFORMATION**

According to the ASTM E 1527-13 standard, certain tasks that may help identify the presence of RECs associated with the Site are generally conducted by the Phase I ESA User. These tasks include: providing, or authorizing the *environmental professional* to obtain, recorded land title records for environmental liens or activity and land use limitations (AULs); providing specialized knowledge related to RECs at the Site (e.g., information about previous ownership or environmental litigation); providing commonly known or *reasonably ascertainable* information within the local community about the *property* that is material to RECs in connection with the *property*; and informing the *environmental professional* if, as believed by the User, the purchase price of the *property* is lower than the fair market value due to contamination. A list of requested information was included in TRC's questionnaire (see Section 1.1). A copy of the User questionnaire is included in **Appendix B**.

#### **3.1 Title & Judicial Records for Environmental Liens or Activity and Use Limitations**

In addition to reviewing the EDR report (discussed in Section 4.2), local municipal records (Section 4.4), and the Massachusetts Land Records on-line database (Section 4.4), TRC obtained supplemental information regarding AUL-listed properties within Town of Dalton from the Massachusetts Department of Environmental Protection (MassDEP). No evidence of AULs associated with the Site was identified.

#### **3.2 Specialized Knowledge**

The User was not aware of specialized knowledge related to RECs at the Site.

#### **3.3 Property Value Reduction Issues**

The User was not aware of property valuation reduction issues regarding the Site.

#### **3.4 Commonly Known or Reasonably Ascertainable Information**

TRC was supplied with commonly known and/or reasonably ascertainable information regarding the Site by Town. This information was used during this Phase I ESA and has been incorporated in this report as applicable.

#### **3.5 Reason for Conducting Phase I**

It is TRC's understanding the User requires a Phase I to provide a better understanding of possible environmental concerns which may warrant further investigation to aid the Town in evaluating redevelopment options.

## 4.0 RECORDS REVIEW

### 4.1 Historical Use Information

Information regarding Site and vicinity historical uses was obtained from various publicly available and practically reviewable sources including:

- Aerial photographs (scale: 1" = 500') dated 1941, 1952, 1959, 1960, 1971, 1975, 1985, 1995, 2008, 2012, 2016; (scale: 1" = 750') dated 1981 and 1992;
- Topographic maps dated 1886, 1891, 1893, 1897, 1899, 1900, 1944, 1946, 1947, 1959, 1973, 1975, 1988, 1997 and 2012;
- City directories dated 1960, 1964, 1977, 1982, 1987, 1992, 1995, 2000, 2005, 2010 and 2014;
- Local municipal records;
- An environmental database report; and
- Interviews with Site representative(s) and regulatory agency official(s), as necessary.

Historical research documentation is included in **Appendix C**.

Historical Sanborn® Fire Insurance Maps (Sanborn Maps) were originally produced for assessing fire insurance liability in urban areas in the United States. The maps provide detailed information (i.e., building construction, facility occupants, storage tank locations, and hazardous material storage areas), which can be used as a resource to document land use and structural change over time.

Research concerning the availability of Sanborn Maps in the vicinity of the Site was conducted by EDR; however, EDR stated that Sanborn Map coverage does not exist for the Site or the nearby surrounding area. The absence of maps for a specific area may signify the area was not significantly developed at the time at which the maps were published.

#### 4.1.1 Site History

##### Operational History

**Table 4.1 - Site History**

Year	Site History
c.1886 – c.1950s	The Site property appears to be used for agricultural purposes; no structures are present.
c.1950s – c. 1995	The Site is developed as industrial use (saw mill – old Dalton Hardwood) consisting of approximately six or seven structures and several staging areas until c. 1995.
c. 1995 – Present	The Site has ceased operations, most of the structures are removed (three remain) and the staging areas are grass covered. The grass area appears to be use for bailing hay.

It does not appear that topographic contours in the Site area have significantly changed during the time period reviewed, although it has been reported that clean sand from a local sand and gravel quarry was brought to the site sometime after 2014.

## Hazardous Substances

No hazardous substances including raw materials; finished products and formulations; hazardous wastes; hazardous constituents and pollutants including intermediates and byproducts that were historically present at the Site, however the Site was historically operated as a saw mill from 1950s until the 1990s. It was reported by local state police that petroleum was stored in ASTs for former saw mill operations near the central portion of the Site.

### 4.1.2 Adjoining Property History

**Table 4.2 - Adjoining Property History**

Direction	Adjoining Property History
North	The property appears to be undeveloped land until c.1960 when a small section is cleared in the northwest. The cleared area appears to have been a small gravel pit with a small structure appearing in 1985. By 1995, the gravel pit and structure are gone, and the area appears to be used for agricultural purposes until the present. The portion of the property directly north of the Site appears to have been wooded land from at least 1940 to the present.
East	The property appears to be used for agricultural purposes since the 1940s until c. 1985. In c.1985, several structures appear surrounded by a staging yard. In 2008, four smaller structures appear, and the surrounding staging yard is replaced with grass and currently present.
South	The property appears to be used for agricultural purposes since the 1940s until the present.
West	The property appears to be used for agricultural purposes since the 1940s until the present.

### 4.1.3 Surrounding Property History

**Table 4.3 - Surrounding Property History**

Years	Surrounding Property History
1886 - Present	Prior to 1959, this area was a mix of undeveloped wooded and agricultural land. Beginning in 1959 a small residential neighborhood was developed to the south followed by Wahconah State park, which are both present.

## 4.2 Database Report & Environmental Record Review

A database search report that identifies properties listed on state and federal databases within the ASTM-required radii of the Site was obtained from EDR and is included in **Appendix A**.

The environmental database report identified four properties/listings. These properties included those that could be mapped and those that could not (i.e., orphan properties). The Site and adjoining properties were not listed in the database search report.

#### **4.2.1 Adjoining & Surrounding Property Record Review**

TRC evaluated the following factors to determine whether additional environmental records should be reviewed with respect to the potential for contaminant migration from the adjoining and surrounding properties:

- (1) Whether the property is up-gradient or down-gradient of the Site vis-à-vis **ground water migration** based on the local topography, and the assumed ground water depth and south-southeast shallow ground water flow direction;
- (2) Whether the property is up-gradient or down-gradient of the Site vis-à-vis **vapor migration** based on readily available information pursuant to the ASTM E 1527-13 standard including soil and geological characteristics; contaminant characteristics; contaminated plume migration data; and significant conduits that might provide preferential pathways for vapor migration such as major utility corridors, sanitary sewers, storm sewers, and significant natural conduits such as Karst terrain (vapor migration may also be influenced by the age and design of infrastructure features associated with these conduits);
- (3) Property case status (i.e., Massachusetts Department of Environmental Protection [MassDEP] has issued a No Further Action letter or a Response Action Outcome [RAO] Statement or Permanent Solution Statement has been submitted);
- (4) Type of database and whether the presence of contamination is known; and
- (5) The distance between the listed property and the Site.

Based on this evaluation, TRC limited the review of additional environmental records to the properties listed below, since the potential for contamination to be migrating to the Site from the other properties identified by the database search is considered low.

Based on the four listings these locations are located downgradient of the Site.

#### **4.3 Previous Reports and Letters**

The following environmental reports and Letters regarding the Site were provided for TRC's for review:

- July 13, 2018, Release Log Form Attached BWSC-102B, prepared by MassDEP; and
- August 2, 2018, Letter RE: Dalton 1-20617 Former Dalton Hardwood Parcel 215-13: North Street (Route 9) M.G.L Ch. 21E, Prepared by MassDEP.

Information provided in these reports is summarized below.

July 13, 2018, Release Log Form Attached BWSC-102B, prepared by MassDEP

According to this form, MassDEP was on Site to inspect the possible release of contamination. One building and remnants of other foundations were observed. The one building still standing appeared to have been used as a maintenance and repair garage. Several aboveground tanks and metal pipes were observed in the center of the Site. One of the on-Site personnel during the visit indicated the possibility of the Dalton Hardwood Company accepting tanks as scrap metal.

The Town commission previously had a few test pits excavated to determine depth to bedrock and uncovered a car frame, crushed drums and scrap metal. Location of the pits were approximately 400 feet north of the garage. Within the garage, several containers 5 to 30 gallons were observed that contained lube oil and hydraulic oils. Recommendations of a Phase I/II due diligence site assessment should be conducted prior to development.

August 2, 2018, Letter RE: Dalton 1-20617 Former Dalton Hardwood Parcel 215-13: North Street (Route 9) M.G.L Ch. 21E, Prepared by MassDEP

According to the letter MassDEP conducted a Site walk for the purposes of assisting the Town with redevelopment plans. The Site historical industrial use was as a former saw mill (1950 until 1990). Observations were an out of use UST, staining from historical use of oils (hydraulic and lubricating oils). The letter provided regulations and requirements to follow if impacts to the subsurface are identified.

#### **4.4 Other Environmental Record Sources**

Per the ASTM standard, local or additional state records were reviewed to enhance and supplement the ASTM-required federal and state records reviewed and discussed earlier in this report. These additional records include state agency lists of: waste disposal facilities; brownfield properties; hazardous waste/contaminated facilities; registered storage tanks; records of emergency release reports; and records of contaminated public wells. Local sources that were contacted to obtain this information include: Department of Health/Environmental Division; Fire Department; Planning Department; Building Permit/Inspection Department and land records (for AULs). Information from these sources is discussed below:

**Table 4.4 - Other Environmental Record Sources**

MUNICIPAL/STATE REGULATORY AGENCY/ DEPARTMENT	Available Information
Department of Health	TRC contacted the Health Department on October 4, 2018. The health Department attended the Site visit and no additional information was provided.
Fire Department	TRC contacted the Fire Department on October 2, 2018. The Fire Department responded on October 22, 2018 and indicated they had no information regarding the Site



**Table 4.4 - Other Environmental Record Sources**

<b>MUNICIPAL/STATE REGULATORY AGENCY/ DEPARTMENT</b>	<b>Available Information</b>
<b>Planning Department</b>	TRC contacted the Town Planner on September 27, 2018. Ms. Slick provided the User and Owner Questionnaires along with the property card and inspections reports for the Site.
<b>Building Permit/Inspection/ Construction/Engineering Department</b>	TRC contacted the Building Department on October 4, 2018. Mr. Brian Duval responded on October 4, 2018 indicating that no permits were found for the Site.
<b>Land Records</b>	TRC obtained copies of the property card from the Town planner and the online database.
<b>State UST Database</b>	TRC reviewed the online MassDEP UST Query Tool on October 4, 2018. No records for USTs were identified.

Copies of the documents obtained are in Appendix E.

## 5.0 SITE RECONNAISSANCE

### 5.1 Methodology and Limiting Conditions

Mr. Thomas Biolsi, Professional Geologist, TRC, conducted a Site reconnaissance of accessible areas on and around the Site on October 4, 2018 for the purpose of identifying potential RECs, and was accompanied by Rebecca Slick (Town Planner), Mr. Ed Fahey (Health Department), and Mr. John Roughley (Highway Department) of the Town of Dalton who provided access to the property and answered questions during the reconnaissance. Officer Glen Lagerwall of the Massachusetts state police, and a member of the North Mountain Advisory Committee whom are focused (in part) on evaluating redevelopment options for this Site, stopped by the Site and provided knowledgeable information about former Site operations and recent activities since the Town's acquisition of the Site in 2014. Photographs taken during the reconnaissance are provided in **Appendix D**. A Site plan depicting historic site features circa 2014 is provided as **Figure 2**. A Site layout plan is included as **Figure 3**.

### 5.2 Interior and Exterior Site Observations

Unless otherwise noted, the items listed in the table below appeared in good condition with no visual evidence of staining, deterioration or a discharge of hazardous materials; and there are no records of a release in these areas. Items where further description is warranted are discussed in the section(s) following the table. The only building remaining onsite is the former garage. Construction debris and the foundation of a former house is present immediately north of the garage.

**Table 5.1 - Interior and Exterior Site Observations**

Item	Present (Current/ Historic/ No)	Description
Hazardous material storage or handling areas	No	None observed, except for the one drum and bucket identified below.
Aboveground storage tanks (ASTs) and associated piping	Historic	None observed during the Site visit but some were historically present – see Section 5.2.2.
Underground storage tanks (USTs) and associated piping	Current	TRC observed vent line located along the southern garage structure suggesting the presence of one UST – See Section 5.2.3
Drums & containers (≥5 gallons)	Current	A red drum in fair conditions was observed in the garage labeled as containing upper cylinder lube with minor amount of liquid inside. Staining was observed on the floor around the drum.  A 5-gallon bucket half full of Universal Tractor Fluid was also observed with the garage. No staining.
Odors	No	None observed

**Table 5.1 - Interior and Exterior Site Observations**

Item	Present (Current/ Historic/ No)	Description
Pools of liquid, including surface water bodies and sumps (handling hazardous substances or substances likely to be hazardous only)	No	None observed
Polychlorinated Biphenyls (PCBs) / Transformers	No	None observed
Stains or corrosion	Current	Staining was observed near the drum located within the garage.
Drains & sumps	No	None observed
Pits, ponds & lagoons	No	None observed
Stressed vegetation	Current	The vegetation near the Town's test pit location is a different color than the surrounding vegetation at the Site. Most of the Site was covered in tall grasses/vegetation.
Historic fill or any other fill material	Current	Sand was thought to have been brought on Site from a local sand and gravel pit.
Wastewater (including storm water or any discharge into a drain, ditch, underground injection system, or stream on or adjacent to the Site)	No	None observed
Wells (including dry wells, irrigation wells, injection wells, abandoned wells, or other wells)	Historic	A drinking water well was reportedly historically present on Site but one was not observed during the Site reconnaissance. Its location is unknown.
Septic systems or cesspools	Historic	It is believed a septic system may have historically been present on the Site to service the former house and former industrial operations but indications of one were not observed during the Site reconnaissance. The location of the possible septic system is unknown.
Debris	Current	A pile of scrap metal was observed to be in poor condition and rusty near the central portion of the Site. Remnants of a former house (construction-related debris) located adjacent to the garage to the north was observed along with tractor tires, additional scrap metal, and equipment parts.

### 5.2.1 Hazardous Substances

No hazardous substances including raw materials; finished products and formulations; hazardous wastes; hazardous constituents and pollutants including intermediates and byproducts are currently present at the Site; except for one drum containing a small amount of upper cylinder lube, and a 5-gallon bucket half full of universal tractor fluid. It is unknown whether the suspected UST near the southeast corner of the garage currently contains petroleum products.

### 5.2.2 Aboveground Storage Tanks

An unknown number of ASTs were reportedly present on the Site as part of the former Dalton Hardwood operations. The former ASTs were reportedly located adjacent to the former Dalton

Hardwood building near the central portion of the Site. No indications of any ASTs were found during the Site reconnaissance. Empty ASTs brought to the Site from an offsite location is discussed in Section 6.0.

### 5.2.3 Underground Storage Tanks

TRC observed a vent pipe near the southeastern corner of the garage running up alongside the exterior garage wall which may be indicative of an existing UST in the area. The UST may be located in front of the garage near the southeast corner of the building due to the lack of large trees in this area as opposed to along the southern wall of the garage. No fill port was found. No additional information was reviewed to indicate the size; contents or age of the UST but is suspected of being a former fuel oil UST to heat the garage (and possibly the adjacent home).

## 5.3 Adjoining and Surrounding Properties Reconnaissance

### 5.3.1 Adjoining Properties

During the Site reconnaissance, TRC viewed the adjoining properties from the Site and publicly accessible areas (e.g., public roadways, etc.).

**Table 5.2 - Adjoining Properties Reconnaissance**

Direction from Site	Current Land Use Description
North	Wooded land
East	Commercial use (existing Dalton Hardwood operations)
South	Wooded land
West	Wooded and agricultural land

### 5.3.2 Surrounding Properties

Surrounding properties generally include agricultural land some residential to the north; east; south; and west.

## 6.0 INTERVIEWS

The following persons were interviewed to obtain historically and/or environmentally-pertinent information regarding RECs associated with the Site.

- Ms. Rebecca Slick, Town Planner of Town of Dalton, MA – *Key Site Manager* (as defined by the ASTM standard and identified by the property owner/User);
- Officer Glen Lagerwall – Massachusetts State Police and member of the North Mountain Advisory Committee;
- Mr. Ed Fahey (Health Department – Town of Dalton); and
- Mr. John Roughley (Highway Department – Town of Dalton).

The information provided by each is discussed and referenced in the text or provided below. Other references and sources of information are included in **Appendix E**.

Mr. Lagerwall provided knowledge information about the historical operations of the Site. When the saw mill was in operation, oil was reportedly sprayed on the surface of the dirt access road for dust suppression. When the southern portion of the access road was paved (beginning at North Street up to the garage), the application of oil reportedly ceased. According to Mr. Lagerwall, the Site only had ASTs on the property associated with the saw mill operations and no known USTs (except for one suspected UST near the southeastern corner of the garage). When the Town acquired the Site in 2014, numerous ASTs were discovered in the woods just beyond the northern Site boundary. The empty ASTs were pulled from the woods onto the Site to be cut up and transported offsite as scrap metal. The empty ASTs were reportedly brought to the woods just north of the Site in the 1980s from the development the Berkshire Crossing plaza.

Mr. Lagerwall also mentioned the excavation of several test pits dug at the Site in the summer of 2018 to investigate potential environmental concerns from the ASTs. Only visually clean sand was observed in the test pits down to approximately 16 feet below grade except for a car frame, crushed drums and scrap metal found in one test pit (as referenced in Section 4.3). Groundwater was encountered in one or more test pits around 16 feet. The sand was reported to have been brought on the Site from a local sand and gravel pit.

## 7.0 FINDINGS, OPINIONS AND CONCLUSIONS

Potential findings can include RECs, historical RECs (HRECs), controlled RECs (CRECs) and *de minimis* conditions, pursuant to the ASTM E 1527-13 standard.

RECs are defined as the presence or likely presence of any *hazardous substances* or *petroleum products* in, on, or at a *property*: (1) due to any *release* to the environment; (2) under conditions indicative of a *release* to the *environment*; or (3) under conditions that pose a *material threat* of a future *release* to the *environment*.

CRECs are defined as a REC resulting from a past *release* of *hazardous substances* or *petroleum products* that has been addressed to the satisfaction of the applicable regulatory authority (for example, as evidenced by the issuance of a no further action letter or equivalent, or meeting risk-based criteria established by regulatory authority), with *hazardous substances* or *petroleum products* allowed to remain in place subject to the implementation of required controls (for example, *property* use restrictions, *activity and use limitations*, *institutional controls*, or *engineering controls*).

HRECs are defined as a past *release* of any *hazardous substances* or *petroleum products* that has occurred in connection with the *property* and has been addressed to the satisfaction of the applicable regulatory authority or meeting unrestricted use criteria established by a regulatory authority, without subjecting the *property* to any required controls (for example, *property* use restrictions, *activity and use limitations*, *institutional controls*, or *engineering controls*).

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

TRC has performed a Phase I ESA in conformance with the scope and limitations of ASTM E 1527-13 at the property located on North Street (Map 215, Lot 13) in Dalton, Berkshire County, Massachusetts (Site), see **Appendices F and G**. Deviations from this standard are described in Sections 1.3 and 7.6 of this report.

### 7.1 RECs and CRECs

This assessment has revealed no evidence of RECs (including CRECs) in connection with the Site, except for the following:

#### REC No. 1

During the Site visit, information was provided regarding oil was sprayed on the dirt road for dust suppression during former Site operations. Although no oil was observed along the access road on the Site, the potential exists for oil contamination to be present along the dirt road that runs through the Site and/or under the existing pavement under the access road in the southern portion of the Site. This would constitute the REC by the potential presence of hazardous

materials in the environment. Depending upon the duration, amount, and frequency of oil application, the REC may be associated with potential soil and/or groundwater contamination.

#### REC No. 2

During the Site visit, TRC observed a vent pipe along the southeast corner of the garage on the Site. TRC believes a UST may be present near this location, possibly located in front of the garage near the southeast corner of the building due to the lack of large trees in this area. No additional information was reviewed that indicated the contents, size, or age of this suspected UST. The potential exists for the assumed contents of petroleum in the UST may have impacted the subsurface conditions at the Site which would constitute a REC.

### **7.2 HRECs**

This assessment has revealed no evidence of HRECs in connection with the Site.

### **7.3 De Minimis Conditions**

This assessment has revealed no evidence of *de minimis* conditions in connection with the Site, except for the following:

- Construction materials from former buildings;
- Tractor tires located on the Site;
- Buried and piles of metal materials; and
- Staining on the concrete garage floor near a 30-gallon drum.

### **7.4 Data Gaps**

TRC has made an appropriate inquiry into the commonly known and reasonably ascertainable resources concerning the historical ownership and use of the Site back to the first development per 40 CFR Part 312.24 (*Reviews of Historical Sources of Information*). Data gaps identified during this assessment include the following:

1. *Ownership records prior to J. Edgar Bardin selling the property in September 1958.*

Based on historical sources reviewed, Data Gap No. 1 is not considered *significant*. The Site was developed in the 1950s as the saw mill and was agricultural land prior to the industrial use.

### **7.5 Limiting Conditions and Deviations**

#### **7.5.1 Accuracy and Completeness**

The ASTM E 1527-13 standard recognizes inherent limitations for Phase I ESAs that apply to this report, including:



- **Uncertainty Not Eliminated** – No Phase I ESA can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Data gaps identified during this Phase I ESA are listed in Section 7.4.
- **Not Exhaustive** – A Phase I ESA is not an exhaustive investigation.
- **Past Uses of the Property** – A review of standard historical sources at intervals less than five years is not required.

The Client is advised that the Phase I ESA conducted at the Site is a limited inquiry into a property's environmental status, cannot wholly eliminate uncertainty, and is not an exhaustive assessment to discover every potential source of environmental liability at the Site. Therefore, TRC does not make a statement i) of warranty or guarantee, express or implied for any specific use; ii) that the Site is free of RECs or environmental impairment; iii) that the Site is "clean"; or iv) that impairments, if any, are limited to those that were discovered while TRC was performing the Phase I ESA. This limiting statement is not meant to compromise the findings of this report; rather, it is meant as a statement of limitations within the ASTM standard and intended scope of this assessment. Specific limiting conditions identified during the Site reconnaissance are described in Section 5.1. Subsurface conditions may differ from the conditions implied by surface observations and can be evaluated more thoroughly through intrusive techniques that are beyond the scope of this assessment. Information in this report is not intended to be used as a construction document and should not be used for demolition, renovation, or other construction purposes.

This report presents TRC's site reconnaissance observations, findings, and conclusions as they existed at the time of the Site reconnaissance. TRC 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. TRC makes no guarantees as to the accuracy or completeness of information obtained from others during the course of this Phase I ESA report. It is possible that information exists beyond the scope of this assessment, or that information was not provided to TRC. Additional information subsequently provided, discovered, or produced may alter findings or conclusions made in this Phase I ESA report. TRC is under no obligation to update this report to reflect such subsequent information. The findings presented in this report are based upon reasonably ascertainable information and observed Site conditions at the time of the assessment.

This report does not warrant against future operations or conditions, nor does it warrant against operations or conditions present of a type or at a location not assessed. Regardless of the findings stated in this report, TRC is not responsible for consequences or conditions arising from facts that were not fully disclosed to TRC during the assessment.

An independent data research company provided the government agency database referenced in this report. Information regarding surrounding area properties was requested for approximate minimum search distances and was assumed to be correct and complete unless obviously contradicted by TRC's observations or other credible referenced sources reviewed during the assessment.

TRC is not a professional title insurance or land surveyor firm and makes no guarantee, explicit or implied, that any land title records acquired or reviewed, or any physical descriptions or depictions of the property in this report, represent a comprehensive definition or precise delineation of property ownership or boundaries.

### **7.5.2 Warranties and Representations**

This report does not warrant against: (1) operations or conditions which were not evident from visual observations or historical information provided; (2) conditions which could only be determined by physical sampling or other intrusive investigation techniques; (3) locations other than the client-provided addresses and/or legal parcel description; or (4) information regarding off-site location(s) (with possible impact to the Site) not published in publicly available records.

### **7.5.3 Continued Validity/User Reliance**

This report is presumed to be valid, in accordance with, and subject to, the limitations specified in the ASTM E 1527-13 standard, for a period of 180 days from completion, or until the Client obtains specific information that may materially alter a finding, opinion, or conclusion in this report, or until the Client is notified by TRC that it has obtained specific information that may materially alter a finding, opinion, or conclusion in this report. Additionally, pursuant to the ASTM E 1527-13 standard, this report is presumed valid if completed less than 180 days prior to the date of acquisition of the property or (for transactions not involving an acquisition) the date of the intended transaction.

### **7.5.4 Significant Assumptions**

During this Phase I ESA, TRC relied on database information; interviews with Site representatives, regulatory officials, and other individuals having knowledge of Site operations; and information provided by the User as requested in our authorized Scope of Work. TRC has assumed that the information provided is true and accurate. Reliance on electronic database search reports is subject to the limitations set forth in those reports. TRC did not independently verify the information provided. TRC found no reason to question the validity of the information received unless explicitly noted elsewhere in this report. If other information is discovered and/or if previous reports exist that were not provided to TRC, our conclusions may not be valid.

## 8.0 REFERENCES

**Table 8.1 - References Information**

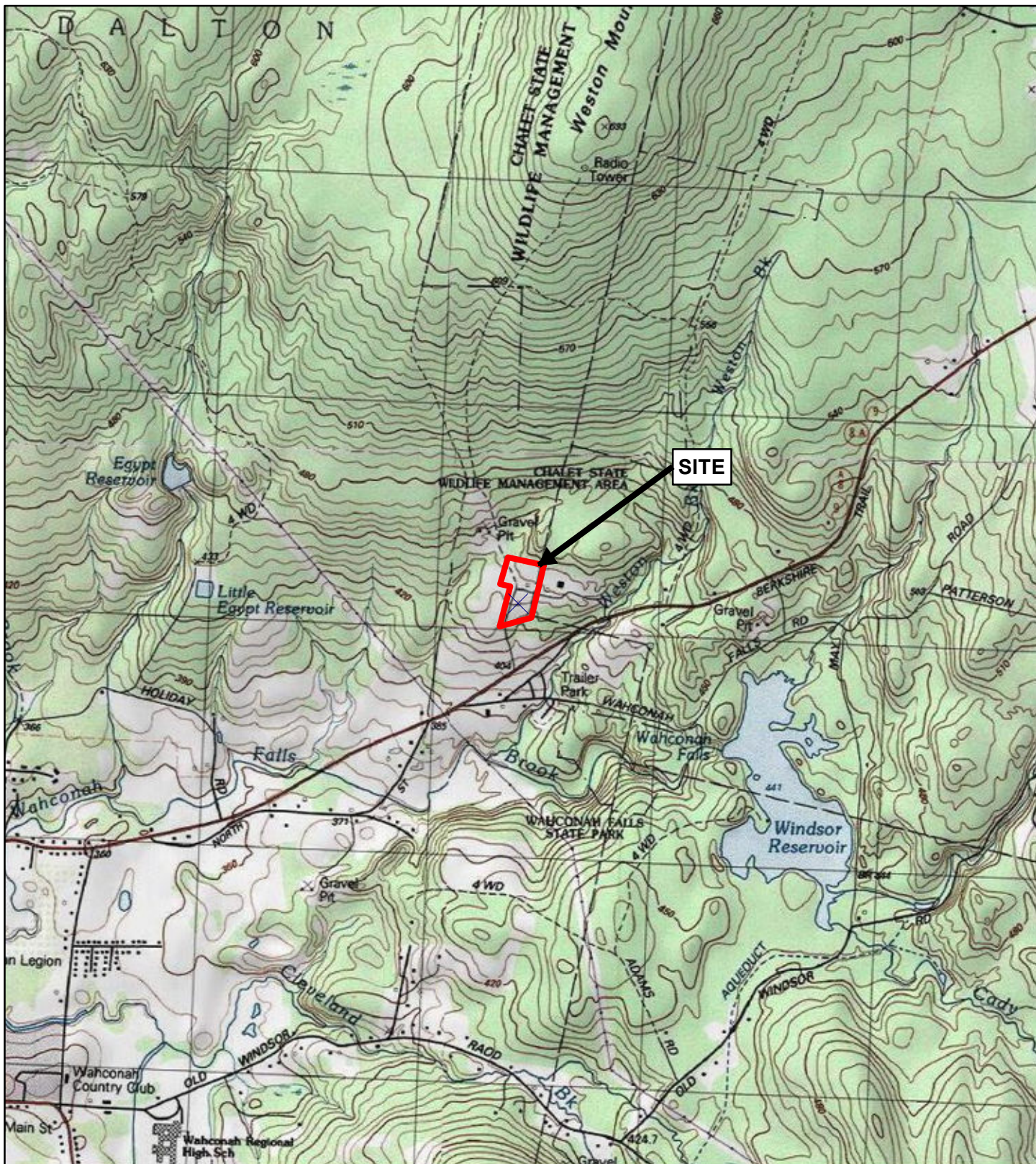
Description/Title of Document(s) Received or Agency Contacted	Date Information Request Filled/Date of Agency Contact	Information Updated	Reference Source
United States Geological Survey <i>7.5 Minute Topographic Quadrangle: Peru, MA</i> , dated 2012	NA	Current	USGS
Aerial photographs dated (scale: 1" = 500') dated 1941, 1952, 1959, 1960, 1971, 1975, 1985, 1995, 2008, 2012, 2016; (scale: 1" = 750') dated 1981 and 1992.	Request No. 5434013.8 on September 25, 2018	Current	EDR
Topographic maps dated 1886, 1891, 1893, 1897, 1899, 1900, 1944, 1946, 1947, 1959, 1973, 1975, 1988, 1997 and 2012.	Request No. 5434013.4 on September 25, 2018	Current	EDR
City Directory dated 1960, 1964, 1977, 1982, 1987, 1992, 1995, 2000, 2005, 2010 and 2014.	Request No. 5434013.5 on September 25, 2018	Current	EDR
Sanborn maps – No Coverage	Request No. 5434013.3 on September 25, 2018	Current	EDR
American Society for Testing and Materials (ASTM). <i>Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process</i> , ASTM Designation E1527-13. 2013.	NA	Current	ASTM
MassDEP Reportable Release Sites	October 4, 2018	Current	MassDEP Website (eDEP)
Google Earth	October 4, 2018	Current	Desktop Application 2018
Radius Map Report / EDR	Request No. 05434013.2r on September 26, 2018	Current	Multiple federal and state agencies

## **9.0 ADDITIONAL SERVICES**

No additional services were performed during this Phase I ESA.

## FIGURES





Site Boundary



0 2,000  
Feet



Wannalancit Mills  
650 Suffolk Street  
Lowell, MA 01854  
978-970-5600

Massachusetts



Map  
Location

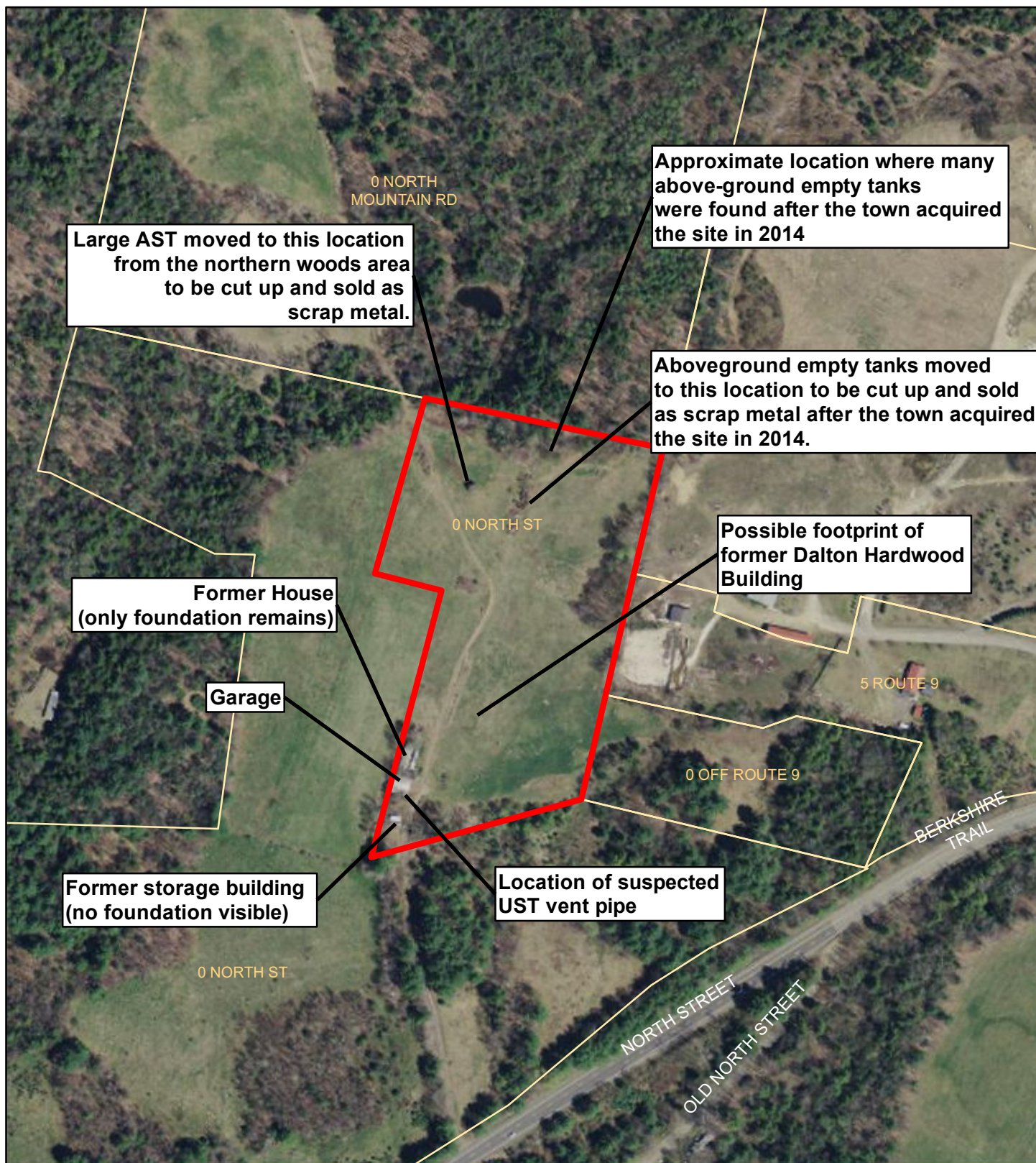
**SITE LOCATION MAP**  
**CITY OF DALTON, MA**  
**LOT 215, LOT 13**  
**DALTON, MA**

FIGURE 1

OCT. 2018

Base Map: ESRI and affiliates





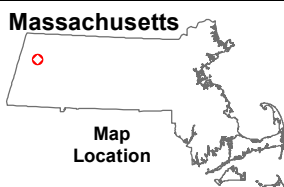
- Site Boundary
- Adjoining parcels



0 300  
Feet



Wannalancit Mills  
650 Suffolk Street  
Lowell, MA 01854  
978-970-5600



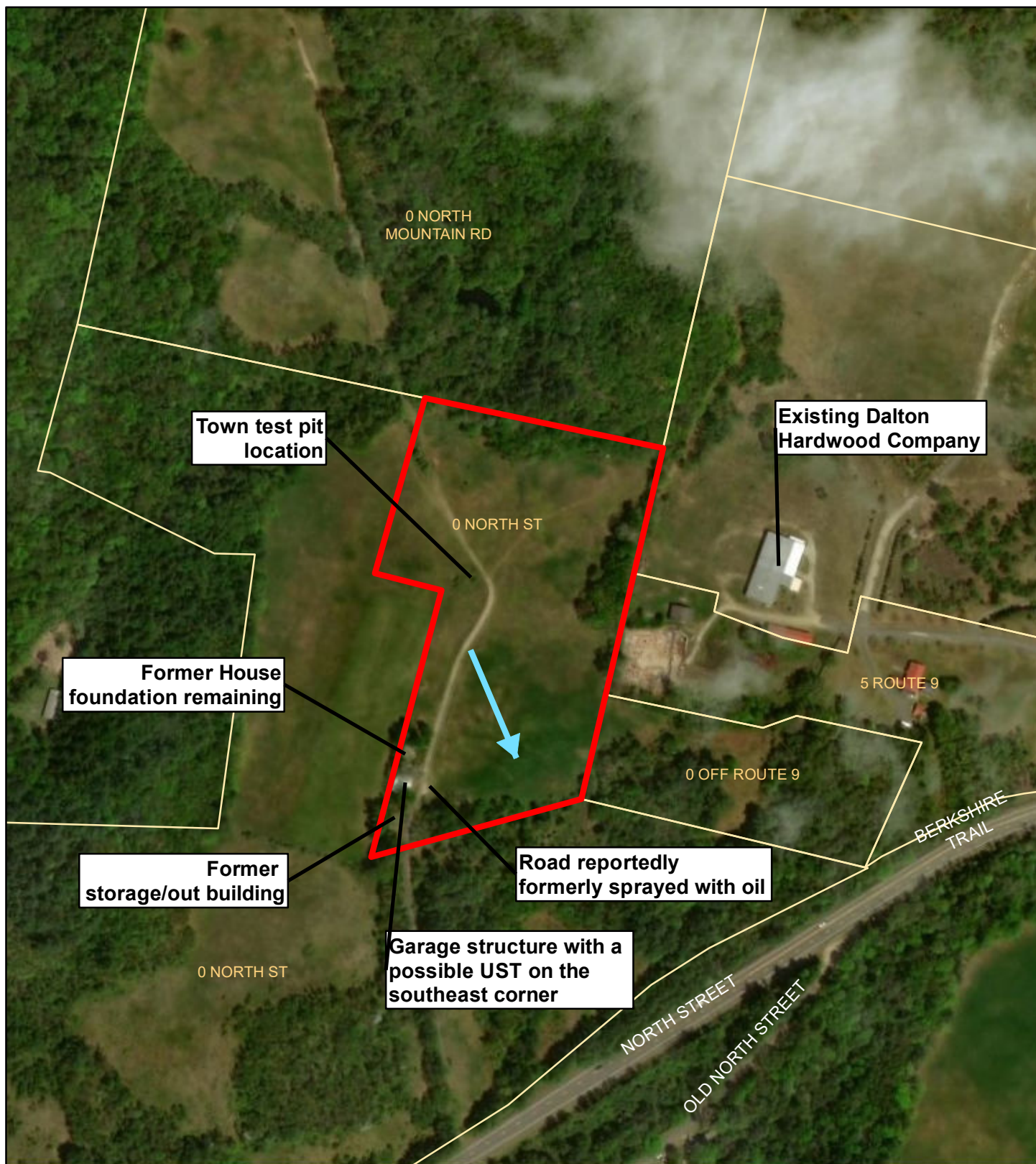
**HISTORIC SITE FEATURES c. 2014  
FORMER DALTON HARDWOOD  
MAP 215, LOT 13  
DALTON, MA**

FIGURE 2

NOV. 2018

Base Map: ESRI and affiliates

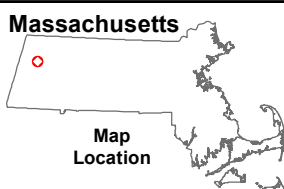




- Site Boundary
- Adjoining parcels
- ← Approximate Direction of Groundwater Flow



0 300  
Feet



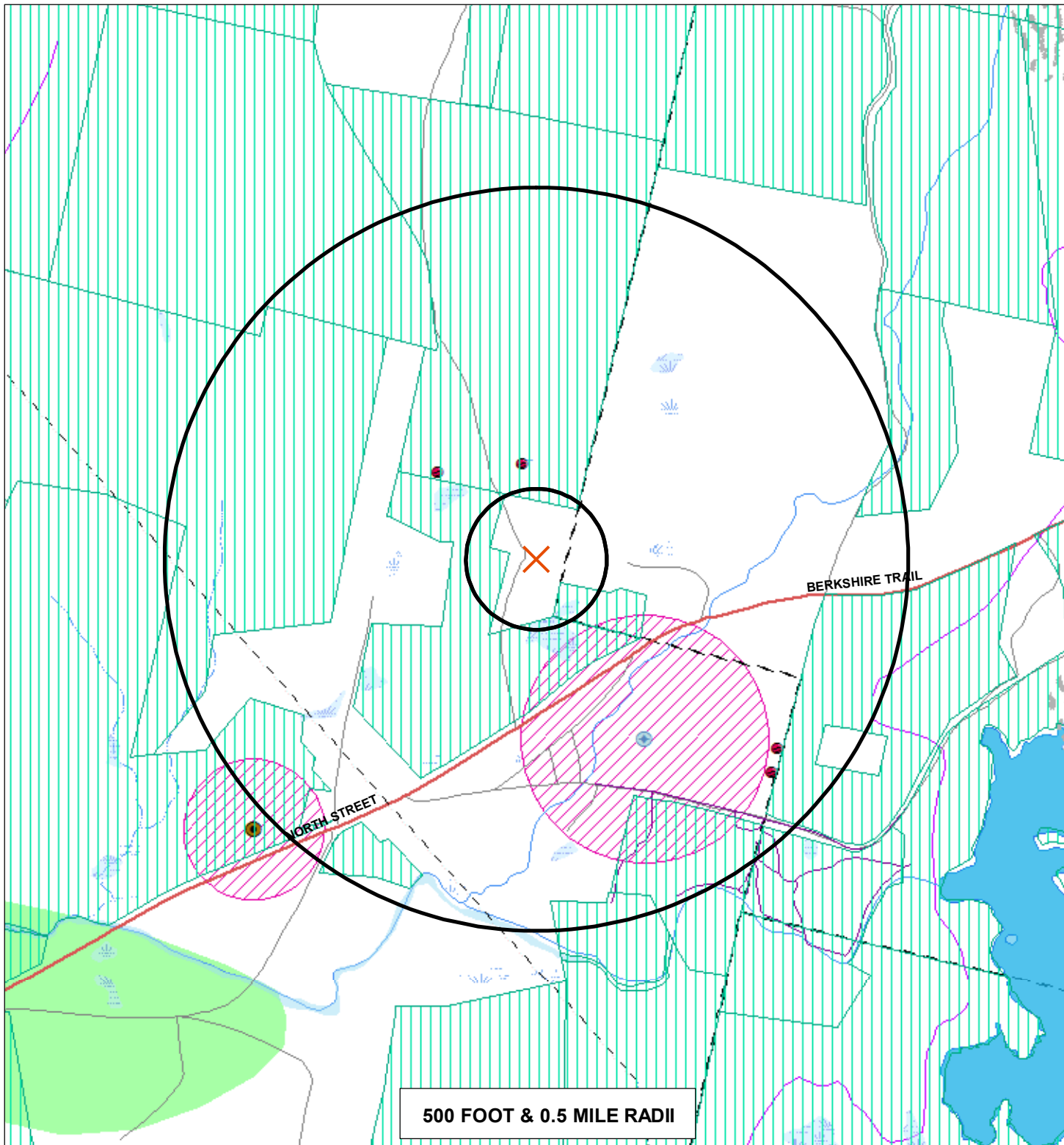
Wannalancit Mills  
650 Suffolk Street  
Lowell, MA 01854  
978-970-5600

**SITE PLAN  
FORMER DALTON HARDWOOD  
MAP 215, LOT 13  
DALTON, MA**

FIGURE 3

NOV. 2018

Base Map: ESRI and affiliates



Roads: Limited Access, Multi-Lane, Major/Minor, Track, Trail  
 Railroad, Pipeline, Powerline  
 Major Basin, Sub Basin, Perennial Stream, Intermittent Stream, Shoreline, Man made Shore, Dam, Aqueduct  
 Wetland, Salt Wetland, Submerged Wetland, Open Water, Reservoir, Tidal Flat/Shoal  
 Potentially Productive Aquifers: Medium, High Yield  
 Non-Potential Drinking Water Source Area: Medium, High Yield  
 EPA Sole Source Aquifer, FEMA 100 Yr. Floodplain, DEP Solid Waste Facility  
 Approved Zone II, IWPA, Surface Water Supply Zone A  
 Protected Open Space, ACEC  
 Priority Habitat, Certified Vernal Pool  
 Boundaries: County and Town  
 Public Water Supplies: Ground, Surface, Non-Community (NTNC, TNC)

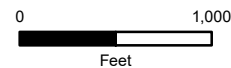
Source: MassGIS/EOEA



Wannalancit Mills  
 650 Suffolk Street  
 Lowell, MA 01854  
 978-970-5600

FIGURE 4

MASSDEP PRIORITY RESOURCES MAP  
 FORMER DALTON HARDWOOD  
 MAP 215, LOT 13  
 DALTON, MA



NOV.  
 2018

**APPENDIX D:**  
**PHOTOGRAPH LOG**



## Appendix D

### Phase I ESA Photograph Log



Photo 1: View of the interior of the garage on Site.



Photo 2: View of the bay located in the garage on Site.



Photo 3: View of a drum located in the garage labeled "Upper Cylinder Lube", with a minimal amount of liquid remaining; staining is visible on the concrete floor.




Photo 4: View of possible former offices located in the garage.



Photo 5: View of possible furnace room in the garage. The hole in the wall near the ceiling appeared to connect to an exterior cinder block chimney.



Photo 6: View of a plastic pipe outside the foundation of a former house located adjacent to the garage.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
293334	Tom Biolsi, TRC	1 of 4	BRPC on behalf of the Town of Dalton	Former Dalton Hardwood, North Street, Dalton, MA	



## Appendix D

### Phase I ESA Photograph Log



Photo 7: View of a 5-gallon bucket half full of Universal Tractor Fluid in the garage. No staining observed.



Photo 8: View of metal debris discarded on Site.



Photo 9: View of a former house adjacent to the garage to the north; construction materials and foundations are visible.




Photo 10: View of construction debris and tractor tires on the Site.



Photo 11: View of the southeast corner of the garage and a suspected vent pipe.



Photo 12: View of the suspected vent pipe visible coming from the ground.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
293334	Tom Biolsi, TRC	2 of 4	BRPC on behalf of the Town of Dalton	Former Dalton Hardwood, North Street, Dalton, MA	



## Appendix D

### Phase I ESA Photograph Log



Photo 13: View of the chimney located on the south side of the garage.



Photo 14: View of the area the Town did excavated a test pit in the central portion of the Site. The vegetation appears discolored.



Photo 15: View of the central of the Site towards the east.



Photo 16: View of the central portion of the Site towards the south.



Photo 17: A pile of metal debris unearthed during the test pit the Town excavated in the central-portion of the Site in the summer 2018.



Photo 18: View from the central of the Site towards the southeast.



## Appendix D

### Phase I ESA Photograph Log



Photo 19: View of the garage facing west.



Photo 20: View of a pile of construction debris from the former house and a pile of metal parts.



Photo 21: View of adjoining property to the east (the current location of the Dalton Hardwood business) from the Site.




Photo 22: View of the northern Site boundary.



Photo 23: View of a pile of metal parts.



Photo 24: View of the remnants of a third former structure (possible outbuilding/storage shed) located to the south of the garage.

TRC Job No.	Photographs Taken By:	Page No.	Client:	Site Name & Address:	
293334	Tom Biolsi, TRC	4 of 4	BRPC on behalf of the Town of Dalton	Former Dalton Hardwood, North Street, Dalton, MA	



**APPENDIX G:**  
**ENVIRONMENTAL PROFESSIONAL STATEMENT**

**DEFINITION OF ENVIRONMENTAL PROFESSIONAL AND RELEVANT  
EXPERIENCE THERETO PURSUANT TO 40 CFR 312**

(1) a person who possesses sufficient specific education, training, and experience necessary to exercise professional judgment to develop opinions and conclusions regarding conditions indicative of releases or threatened releases (see §312.1(c)) on, at, in, or to a property, sufficient to meet the objectives and performance factors in §312.20(e) and (f).

(2) Such a person must: (i) hold a current Professional Engineer's or Professional Geologist's license or registration from a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) and have the equivalent of three (3) years of full-time relevant experience; or (ii) be licensed or certified by the federal government, a state, tribe, or U.S. territory (or the Commonwealth of Puerto Rico) to perform environmental inquiries as defined in §312.21 and have the equivalent of three (3) years of full-time relevant experience; or (iii) have a Baccalaureate or higher degree from an accredited institution of higher education in a discipline of engineering or science and the equivalent of five (5) years of full-time relevant experience; or (iv) have the equivalent of ten (10) years of full-time relevant experience.

(3) An environmental professional should remain current in his or her field through participation in continuing education or other activities.

(4) The definition of environmental professional provided above does not preempt state professional licensing or registration requirements such as those for a professional geologist, engineer, or site remediation professional. Before commencing work, a person should determine the applicability of state professional licensing or registration laws to the activities to be undertaken as part of the inquiry identified in §312.21(b).

(5) A person who does not qualify as an environmental professional under the foregoing definition may assist in the conduct of all appropriate inquiries in accordance with this part if such person is under the supervision or responsible charge of a person meeting the definition of an environmental professional provided above when conducting such activities.

*Relevant experience*, as used in the definition of environmental professional in this section, means: participation in the performance of all appropriate inquiries investigations, environmental site assessments, or other site investigations that may include environmental analyses, investigations, and remediation which involve the understanding of surface and subsurface environmental conditions and the processes used to evaluate these conditions and for which professional judgment was used to develop opinions regarding conditions indicative of releases or threatened releases (see §312.1(c)) to the Site. TRC personnel resume(s) are included in **Appendix F**.

---

I declare that, to the best of my professional knowledge and belief, I meet the definition of environmental professional as defined in §312.10 of 40 CFR 312.

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 forth in 40 CFR Part 312.

Signature of  
Environmental  
Professional:



Date: 11.5.2018