

Phase I Environmental Site Assessment

One Terminal Way
Norwich, Connecticut

Prepared for:

City of Norwich

Submitted by:

Paul Burgess, LLC
36 Elm Street
Stonington, CT 06378

February 2013

PAUL BURGESS, LLC

Environmental Consulting,
Engineering & Permitting

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Paul Burgess, P.E., LEP

I declare that, to the best of my professional knowledge and belief, I meet the definition of Environmental Professional as defined in 40 CFR Part 312.10. 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 all the appropriate inquiries in conformance with the standards and practices set forth in 40 CFR Part 312.

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Executive Summary

Property Description and Ownership

The property is owned by Lehigh Petroleum Supply, Inc. and is currently unoccupied. The previous land use was industrial, most recently by Lehigh Oil (an oil/gasoline distribution and service facility) and several wire manufacturers. Lehigh also operated offsite gasoline service stations that are not part of the subject property or assessment. The three-acre property is located at 1 Terminal Way. There are four masonry structures onsite generally surrounded by pavement: a "Warehouse" structure fronting Terminal Way, an "Office" building attached and perpendicular to Terminal Way, a "Garage" structure on the north side of the property, and a centrally located "Boiler/Hanger" building. These building names are as designated during the use by Lehigh Oil. Previous and post Lehigh uses are discussed in this report. The Norwich Assessor's designation is Map 117, Block 4, Lot 34.

The City of Norwich is considering leasing the property and constructing a boat launch facility for access to the Thames River.

Land Use

The land use in the site vicinity is underutilized former industrial and commercial development. Some residential development exists to the west of the property. Most recently, a scrap yard, Norwich Iron & Metal, existed to the north of the site, abutting the Thames River. Prior industrial use on this northern parcel included an oil storage facility, power plant, and iron works. Directly south of the site, a property storage facility occupies the former American Woolen Co. factory. An uncompleted residential condominium conversion, of portions of this mill building, is located further to the south. Former petroleum bulk storage facilities of Dahl Oil and Lehigh Oil (later address 296 West Thames Street) are located further south on Terminal Way, abutting the Thames River. The Thames River abuts the site to the east and the Central Vermont railroad tracks directly abut the site to the west. Across Terminal Way to the west, at 26 Shipping Street, is an industrial building currently owned by the City of Norwich. CTDEEP records indicate United Metal operated on that parcel from the 1950s until circa 2001, when the City of Norwich foreclosed on the property. CTDEEP records indicate United Metal manufactured involved zinc die-castings for the manufacture of lamps and related products.

Site History

The site is estimated to have been first developed circa mid 1800s. Thames Iron Works and Wickersham Nail Co. were the first known onsite industries. In 1885, the site was occupied by Richmond Stove Co. From circa 1892 through 1938, Norwich Cutlery Co./International Silver occupied the site and conducted silver product manufacturing. Lehigh Oil operated a petroleum (fuel oil and gasoline) distribution facility onsite from circa 1946 through 1998. Various wire manufacturing business operated onsite from circa 1995 through 2003. Other tenants have included Service Station Equipment (late 1980s/early 1990s-petroleum facilities contractor/tank removals) and American Environmental (spill response contractor) 1994.

Site Inspection and Building Description

Paul Burgess, P.E., LEP, of Paul Burgess, LLC, inspected the property on February 8, 21 and 26, 2013. On February 21, 2013, Peter Castle (property owner representative) and John Podurciel (former terminal manager/employee circa early 1960s to 1997.) accompanied Paul Burgess on the site inspection.

There are four masonry structures onsite generally surrounded by pavement. Remnants of the petroleum loading racks (vapor recovery structure, concrete pads, containment facilities, oil water separator) are located on the south side of the property. Petroleum product was pumped to the site, via underground pipes below Terminal Way, from a bulk storage terminal located south of the site at 296 West Thames Street.

The only onsite catch basins observed were associated with the former loading/unloading rack spill collection system. Surface water runoff generally flows over the site pavement and discharges as runoff to the Thames River. Available maps at the Norwich Public Works Department indicate a storm drainage pipe from Shipping Street flows to the Thames River along the southern property line. The storm drain outlet was observed and is still functioning.

The terminal layout and spill containment system is shown on figures included with this report. Spills and rainwater were collected in grates and sumps (some metal covers visible in field), and piped to subgrade concrete collection tanks. The collected water was pumped to an oil water separator facility off the east end of the office building. Collected petroleum products were discharged to a subgrade tank. Water was piped to a dry well located near the northeast corner of the office building. The terminal had a gasoline vapor recovery system used during tank truck loading operations. Collected gasoline residual product was stored in an above ground storage tank above the vapor recovery structure.

A large diameter standpipe is present on the south side of the property, in the former petroleum loading rack area. It was formerly used to recover spilled petroleum product from the groundwater.

Warehouse: The Warehouse building is a long masonry structure that parallels Terminal Way and the railroad tracks. The estimated constructed date is the mid 1800s and the estimated size is approximately 12,000 square feet. The majority of former equipment or stored materials have been removed. It is served by a rear (east) loading dock with two interior concrete loading/unloading ramps. An overhead door also provides access on the south side of the building. Various former electrical components have been significantly vandalized for scrap. The lack of natural light made the interior inspection limited. There were two empty 275-gallon fuel oil above ground tanks inside the building, which formerly supplied fuel to ceiling mounted heating units.

Historically, various operations included grinding and polishing associated with Norwich Cutlery and International Silver. A machine shop and a boiler were located adjacent and east of the warehouse structure near the current loading dock. Lehigh used this building for petroleum product storage (principally pre-package motor fluid cans for use at offsite service stations). The most recent tenant was Metal Processing Assistance, a wire drawing facility.

Office: The Office building connects to the Warehouse (south end) and extends perpendicular to Terminal Way towards the Thames River. It is approximately 8,800 square feet. It has a crawl space (dirt floor) basement under most of the building. The crawl space was not inspected (less than three feet high), but was observed via an access panel below the office floor. Piping was observed in the crawl space. The Office building contained former offices, bathrooms, kitchen and electric/computer room. A large wash sink was present in the men's restroom, formerly used by Lehigh maintenance employees and drivers. In the southwest corner of the building, remaining controls for the outside petroleum terminal facility were observed, as well as electric power supply components. Various former electrical components have been significantly vandalized for scrap.

This building was constructed circa 1909 during the occupancy of International Silver, when it was used for finishing and sizing, and was subsequently used by Lehigh as office space.

Garage: This is a one-story brick structure previously used by Lehigh for vehicle maintenance and washing, and historically by Norwich Cutlery and International Silver as a forge shop. Lehigh conducted vehicle painting in the western bays (east side). Assessor's records indicate the garage floor area is 8844 square feet. It contains five large work bays (three west side and two east side), concrete floors, and a number of overhead access doors. A parts room and office existed on the northeast side of the western bays. Ceiling material has fallen on the floor. An empty 275-gallon fuel oil above ground tank is located in the western

bays and a former 275- empty fuel oil above ground tank was located in the eastern bays (both associated with former fuel oil burners for heat).

Within the western bays there is a concrete lined trench drain formerly used to collect vehicle wash waters. Records indicate this trench floor drain discharged to a floor drain (observed in the eastern bays), then to the Thames River. Subsequently, the floor drains discharged to a dry well near the southeast corner of the Garage.

Floor staining was observed in the eastern bays. Various containers of chemical products were stored on the floor nearby. A small exterior concrete wall containment system was observed outside the eastern bays. Mr. Podurgiel indicated a 275- gallon fuel oil above ground tank was once located above the containments system, and was used by Lehigh service mechanics to dispose of excess fuel oil generated from offsite service calls.

Boiler/Hanger: This is a one story concrete block structure with concrete floors, previously used by Lehigh Oil as a boiler room and parts storage. The Hanger building was originally used for storage of a helicopter. The hanger portion of the building is accessed by a large overhead door on the east side. Assessor's records indicate the garage floor area is 1800 square feet.

The boiler is still present and was served by a fuel oil underground storage tank outside the building. A shower area existed on the east side of the boiler building (three shower sumps with drains). No floor drains were observed in the building, with the exception of the showers. An empty 275- gallon fuel oil above ground tank was present on the north side of the hanger building, which served a separate furnace in that area. A previous inspection report documented one 55 gallon drum (waste oil and associated floor staining) and one 55 gallon drum (lube oil) in this building. A transformer (appeared to be dry type) was observed on the floor of the Hanger building.

Norwich Public Utilities and the Uncas Health District have no records of the onsite structures being connected to the sanitary sewer. Other file information confirms past sanitary discharges are to the Thames River. A map obtained from the Norwich Public Works Department shows two wastewater discharges to the river: one from the Garage floor drains and one from the Office restrooms.

Chemical/Petroleum Storage

Currently, chemical/petroleum storage is limited. Some chemical product storage was noted in the Garage building as previously discussed.

Metal Processing Assistance, and other similar operations, conducted wire drawing in the Warehouse building. Wire was drawn through equipment that used lubricating oil/water. Lubricating oil was previously stored in eleven 275 gallon (approximate size) above ground tanks. Used oil and sludge was stored in 55 gallon drums and were picked up by a disposal company.

Lehigh distributed significant quantities of fuel oil and gasoline from the onsite terminal from circa 1946 through 1998. Other petroleum products and waste oil were stored onsite, including in underground storage tanks. Vehicle maintenance, washing and painting activities took place in the Garage building. Steam cleaning of vehicles took place outside the Garage. Excess water from the spill containments system oil water separator, and floor drains in the Garage building, were discharged to dry wells.

Service Station Equipment (late 1980s/early 1990s-petroleum facilities contractor and tank removals) and American Environmental (spill response contractor- circa 1994) likely stored petroleum products onsite, based on the nature of their business.

Norwich Cutlery and International Silver manufactured silver products onsite from circa 1892 until 1938. Operations included forging, etching, grinding and polishing. A machine shop, boiler and oil house were located onsite. The specific waste management practices are unknown. Silver byproduct wastes are likely.

Petroleum Storage Tanks

Six known steel petroleum underground storage tanks existed onsite as further discussed in this report. There were records of two tanks that leaked (gas vapor collection tank and gasoline tank). Soil cleanup was conducted at the gas vapor collection tank. It is noted that the installation date of the first known underground storage tanks is 1960, and Lehigh has occupied the site since circa 1946. It is likely that other underground storage tanks exists/existed onsite. An "oil house" was noted onsite (near current Boiler/Hanger building) during the occupancy by Norwich Cutlery and International Silver. In addition, available information indicates that three concrete underground storage tanks, associated with the spill containment system, exists onsite. Manholes were observed onsite to suggest these tanks are likely still present.

Above ground petroleum storage tanks exist/existed onsite as discussed in this report.

Fill

The western portion of the site is mapped as underlain by alluvium, which consists of gravel, sand, and silt. The eastern portion of the site is mapped as consisting of artificial fill. It appears

much of the site has historically been filled and was expanded within the Thames River bed. Slag material, indicative of fill, was observed along the river bank at the site.

Interviews

Information requested included knowledge or documentation regarding any past local, state, or federal environmental inspections of the site; any environmental correspondence, orders, violations, liens or institutional controls regarding the property; any past or ongoing releases of hazardous substances or petroleum products; or any other relevant information that would suggest the potential presence of a recognized environmental condition.

Peter Castle, property owner representative, was interviewed. Mr. Castle was a manager onsite from circa 1974 until closing circa 1998. He indicated to his knowledge there have been no environmental orders, cleanup liens or activity and land use limitations filed or recorded for the subject site. He was not aware of the 1973 CTDEP (predecessor agency to CTDEEP) order subsequently discussed in this report. He was generally aware of the various spills reported to CTDEEP and the underground storage tanks removed from the site.

Environmental Regulatory Review

Based on a review of city land records, the electronic environmental database and interviews, no environmental orders, liens, engineering controls or land use restrictions are recorded or filed for the site.

There has been numerous petroleum spills onsite reported to CTDEEP as documented in this report. The CTDEP issued an order to Lehigh Oil in 1973 to construct the spill containment system.

The subject property is included on the State Site Discovery and Assessment list (March 2, 1998) related to a leaking underground storage tank. Chemicals of concern are listed as non-chlorinated volatile organic compounds and semi-volatile organic compounds. This appears to be related to the 500- gallon gasoline vapor underground storage tank removed in September 1997. Additional documentation is provided in this report.

The subject property is listed on the CTDEEP Leaking Underground Storage Tank database. CTDEEP records (September 4, 1997) indicate a 550- gallon kerosene underground storage tank and a 2000- gallon fuel oil underground storage tank as leaking. The CTDEEP report indicates the tanks were removed and contaminated soil removed. The status is listed as *Cleanup Initiated*. Note tank sizes and contents are not consistent between various CTDEEP reports and underground storage tank notification forms.

Soil Vapor Intrusion

Based on the significant number and quantity of petroleum releases at this site, aromatic vapor intrusion into onsite structures could be an issue for re-occupancy of existing building or potential new structures.

Data Gaps

There were no data gaps identified while conducting this project.

Recognized Environmental Conditions

A number of recognized environmental conditions were identified by this Phase I Environmental Site Assessment. A summary of the recognized environmental conditions are as follows:

- Fill was placed at the site in the 1800s of unknown origin and chemical quality. Investigations at 26 Shipping Street indicated the fill at that property contained chemicals at concentrations above CTDEEP standards.
- Chemical/petroleum storage and waste management practices of Norwich Cutlery and International Silver.
- Potential undocumented releases from most recent wire drawing manufacturing operations.
- Several significant petroleum releases from Lehigh terminal operation on the south side of the property, including potential undocumented releases from underground product transfer lines. Some remediation has been conducted but residual soil and groundwater contamination is likely.
- Releases from the operation of the spill containment and oil/water recovery system, associated tanks, and drywell discharge.
- Known former underground storage tanks onsite. Release assessments were not conducted on tanks removed in 1988 and the gasoline tank was noted to have leaked.
- Potential tanks/releases at the site prior to 1960 (first documented tanks onsite).
- Vehicle maintenance and painting activities at the Warehouse structure and floor drain discharge to the Thames River, and then subsequently to a drywell. Records indicate that vehicles were formerly steam cleaned outside the Garage building
- The former junkyard and petroleum terminal on adjacent property to the north, and potential contamination migration onto the subject site.

Recommendations

Based on the understanding the City of Norwich would lease the property and not purchase, it is recommended that a Phase II Site Investigation be designed, in conjunction with the City of Norwich, to investigate areas of the property requiring construction and excavation associated with the proposed boat launch facility. It is likely that any excavated soil will require proper management and offsite disposal. This investigation should also assess if petroleum products may be mobilized and released to the Thames River during construction.

Should the City of Norwich consider purchase of the property, an investigation of all recognized environmental conditions is recommended.

1. Introduction

1.1 Purpose and Scope of Services

The scope of service for this project was to complete a Phase I Environmental Site Assessment (Phase I ESA) for the City of Norwich for property at 1 Terminal Way in Norwich, CT. The City of Norwich is considering leasing the property and constructing a boat launch facility for access to the Thames River. Mr. Peter Castle was the representative of the property owner.

This Phase I Environmental Site Assessment (Phase I ESA) provides a professional opinion regarding the identification of *recognized environmental conditions* pertaining to the potential presence of hazardous substances or petroleum products at this property. The American Society for Testing and Materials (ASTM) *Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process (E 1527-05)* and the Connecticut Department of Environmental Protection (CTDEEP) *Site Characterization Guidance Document (September 2007)* were followed in conducting this project. A recognized environmental condition, as defined by ASTM, means the presence or likely presence of any hazardous substances or petroleum products on a property under conditions that indicate an existing release, a past release, or a material threat of a release of any hazardous substance or petroleum product into structures on the property or into the ground, groundwater, or surface water on the property. In addition, this Phase I ESA was conducted in conformance with the United States Environmental Protection Agency's (EPA), *All Appropriate Inquiries Final Rule*, effective November 1, 2006 (40CFR Part 312).

The scope of the Phase I was as follows:

- Conduct a records review, which includes certain environmental records and historic use information. This information is described in more detail in this report.
- Assess potential receptors (i.e., groundwater, surface water, and water supplies).
- Describe the site geology.
- Perform a reconnaissance of the site and accessible areas of adjacent properties.
- Conduct interviews with current owners, occupants of the property and user of the report.
- Summarize previous environmental assessments and investigations conducted at the site.

- Summarize the findings relative to the potential presence of hazardous substances or petroleum products at the subject property and identify recognized environmental conditions.

This Phase I ESA did not include a hazardous building material survey of the onsite structures.

1.2 Site Description

The property is owned by Lehigh Petroleum Supply, Inc. and is currently unoccupied. The previous land use was industrial, most recently by Lehigh Oil (an oil/gasoline distribution and service facility) and several wire manufacturers. Lehigh also operated offsite gasoline service stations that are not part of the subject property or assessment. The three-acre property (estimated from property dimensions) is located at 1 Terminal Way and abuts the Thames River to the east. There are four masonry structures onsite generally surrounded by pavement: a "Warehouse" structure fronting Terminal Way, an "Office" building attached and perpendicular to Terminal Way, a "Garage" structure on the north side of the property, and a centrally located "Boiler/Hanger" building. These building names are as designated during the use by Lehigh Oil. Previous and post Lehigh uses are discussed in this report. The Norwich Assessor's designation is Map 117, Block 4, Lot 34. The City Assessor's field card is included in Appendix A. The site location is shown on Figure 1. A Schematic Site Plan is provided as Figure 2. A layout of the oil/gasoline distribution facilities is included in Figure 3.

1.3 Title Records

A review of available land title records was conducted to determine previous site ownership to the extent practicable within the limits of this project scope. This review should not be considered a complete title search and was conducted to gain information regarding past site usage. A summary of title information is provided below:

- Eastern Connecticut Petroleum Supply Corp. to Lehigh Petroleum Supply, Inc. (name change), August 10, 1988.
- Lehigh Petroleum Supply Limited Partnership to Eastern Connecticut Petroleum Supply Corp., April 15, 1988.
- Various transactions between Castle family members [current property owners and relatives of Jacob R. Slosberg (previous owner)].
- Trimount Dredging Corp. (bankruptcy), property reverts to Jacob R. Slosberg, October 2, 1945.
- Foreclosure proceedings by Jacob R. Slosberg vs. Trimount Dredging Corp.
- Jacob R. Slosberg to Trimount Dredging Corp. September 11, 1940.
- Sagamore Realty Co. to Jacob R. Slosberg, November 28, 1939. *Deed references conveyance of "two large tanks in front of premises".*
- Isadore Berkman to Sagamore Realty Co., December 27, 1938.

- International Silver to Isadore Berkman, December 12, 1938.

A search of land records at the Norwich City Clerk's offices did not identify any CTDEEP orders, environmental liens, or institutional controls recorded for the subject site.

A copy of the property deed is included in Appendix B.

2. Site History

The objective of evaluating the history of the property is to develop an understanding of previous on-site and adjacent land uses and occupancies that could have caused a release of hazardous substances or petroleum products. This information is used to help identify the potential of past uses having led to recognized environmental conditions in connection with the property. The goal of this aspect of the study is to review standard historical sources to identify obvious uses of the property back to its first developed use. The site history of a property may be compiled from available atlas maps, United States Geological Survey (USGS) topographic maps, Sanborn Fire Insurance (Sanborn) maps, aerial photographs, city directories, property tax files, recorded land title records, building department records and interviews. All site history sources may not be available or may not necessarily be reviewed to meet the stated goal.

The following summarizes the site history based on the reference sources noted above.

In 1868, the Thames Iron Works and Wickersham Nail Co. occupied the central and north portion of the site. A shipyard is depicted on the south side of the property.¹ The original construction dates of the factory buildings are unknown, but are estimated to be mid 1800s. In 1876, Thames Iron Works occupied the site and the property to the north.² In 1885, the site is occupied by Richmond Stove Co., in the current front Warehouse structure.³ The current Office building was not constructed at that time. The current Garage building and a rear structure (not currently present) were depicted as “molasses” storage. Thames Iron Works is depicted to the north. In 1892/1897/1903, Norwich Cutlery Co. occupies the site and expansion occurs.⁴ International Silver Company purchased Norwich Cutlery Co. in 1898.⁵ Various operations in the current Warehouse building included grinding and polishing. A machine shop, etching and a boiler building were located adjacent and east of the Warehouse structure. A forge shop was located in the Garage structure and an oil house near the location of the current Boiler/Hanger building. A small “benzene” – gasoline structure was present in 1903. By 1909/1914, International Silver Co. Factory G operations had further expanded.⁶ The current Office building had been constructed and its use was finishing and sizing. A new rear structure, close to the river, (no longer present) was used for polishing, packing and storage.

¹ 1868 Peterson Map of Norwich, CT.

² 1876 City of Norwich, CT Lithograph, C.H. Vogt.

³ 1885 Sanborn Fire Insurance Map.

⁴ 1892, 1897 & 1903 Sanborn Fire Insurance Maps

⁵ Thomas J. Dodd Research Center, University of Connecticut, website.

⁶ 1909 & 1914 Sanborn Fire Insurance Maps.

In 1926, International Silver remains onsite with similar operations as previously discussed.⁷ Industrial development on the property to the south had expanded to a large factory complex occupied by the American Woolen Co. A power station to the north is depicted as the Connecticut Co. Sub Station. A 1934 aerial photograph was consistent with the 1926 Sanborn Map. By 1949, Lehigh Inc. is shown occupying the property.⁸ The Warehouse building is shown as "storage". The Office building is shown as "office and storage". The Garage structure was used for "storage". The former boiler room, east of the warehouse, and the polishing, packing and storage structures on the east side of the property, near the river, are no longer depicted. The current Boiler structure was depicted at that time. A "gas and oil loading" platform is shown on the south side of the site. Socony Oil Co., on the property to the north, is depicted as an oil distribution depot, with multiple above ground oil tanks. American Woolen Co. is depicted on the property to the south. In 1972, the site is occupied by Lehigh Petroleum and its use is consistent with that previously discussed. The Socony Oil Co remains on the site to the north. At that time, American Thermos Products occupied the factory complex to the south.⁹ Aerial photographs 1965-1990 show site features similar to the 1972 Sanborn Map. They show many large fuel tanker trucks parked on the east side of the site.

A summary of relevant past property tenants from Norwich City Directory information and interviews is included below:

1915-1938 Norwich Cutlery/International Silver (*note- 1915 is first year of city directory listings correlated by address*)
1938-1940 Trimount Dredging
1946- 1998 Lehigh Oil/Petroleum (fuel oil & gasoline)
Nutmeg Wire 1988-1993
Service Station Equipment (late 1980s/early 1990s-petroleum facilities contractor and tank removals)
American Environmental (spill response contractor) 1994
Continental Brass 1995
Hottec Inc. 2000-2003
Stitching Wire Direct 2003
Metal Processing Assistance 1996-2003

Copies of select site historical information are provided in Appendix C.

⁷ 1926 Sanborn Fire Insurance Map.

⁸ 1949 Sanborn Fire Insurance Map

⁹ 1972 Sanborn Fire Insurance Map.

3. Environmental Setting

3.1 Land use

The land use in the site vicinity is underutilized former industrial and commercial development. Some residential development exists to the west of the property. Most recently, a scrap yard, Norwich Iron & Metal, existed to the north of the site, abutting the Thames River. Prior industrial use on this northern parcel included an oil storage facility, power plant, and iron works. Directly south of the site a property storage facility occupies the former American Woolen Co. factory. An uncompleted residential condominium conversion of portions of this mill building, is located further to the south. Former petroleum bulk storage facilities of Dahl Oil and Lehigh Oil (later address 296 West Thames Street) are located further south on Terminal Way, abutting the Thames River.

The Thames River abuts the site to the east and the Central Vermont railroad tracks directly abut the site to the west. Across Terminal Way to the west, at 26 Shipping Street, is an industrial building currently owned by the City of Norwich. CTDEEP records indicate United Metal operated on that parcel from the 1950s until circa 2001, when the City of Norwich foreclosed on the property. CTDEEP records indicate United Metal manufactured involved zinc die-castings for the manufacture of lamps and related products.

3.2 Topography

The topography of the site and vicinity is shown on Figure 1. Based on the City of Norwich GIS mapping, the elevation of the site varies from 5-6 feet mean sea level.

3.3 Site Geology

The western portion of the site is mapped as underlain by alluvium, which consists of gravel, sand, and silt.¹⁰ The eastern portion of the site is mapped as consisting of artificial fill. It appears that much of the site has historically been filled and expanded within the Thames River bed. The site is underlain by approximately 40 feet of saturated coarse-grained stratified drift.¹¹

Bedrock below the site is Putnam Gneiss, a sillimanite-pinite schist phase.¹² The depth to bedrock at the site is unknown.

¹⁰ United States Geological Survey (USGS) Surficial Geology Map of the Norwich Quadrangle, 1962.

¹¹ The USGS Water Resources Inventory of Connecticut Lower Thames and Southeastern Coastal River Basin, 1968.

¹² USGS Bedrock Geology of the Norwich Quadrangle, 1961.

3.4 Groundwater

Groundwater below the site and the site vicinity is classified by the CTDEEP as a GB groundwater area.¹³ The GB classification indicates (1) groundwaters within highly urbanized areas or areas of intense industrial activity, and (2) areas where public water supply service is available. The groundwater may not be suitable for direct human consumption because of waste discharges, spills or leaks of chemicals, or land-use effects. The state's goal is to prevent further degradation by preventing additional discharges that would cause irreversible contamination.

The flow direction of groundwater is controlled mainly by topography. However, flow is also influenced by aquifer type, depth to bedrock, watercourses near the site, groundwater use, and subsurface structures. The groundwater flow direction is anticipated to be east/southeast towards the Thames River.

3.5 Surface Water

The nearest watercourse to the subject site is the Thames River, which forms the easterly property boundary. The Thames River is a tidally influenced estuary that is navigable and supports wildlife and a significant saltwater fishery.

This surface water is classified by the CTDEEP as SC/SB, designating the waters for marine fish, shellfish, and wildlife habitats, recreation, industrial supply, and other legitimate uses, including navigation. The SC/SB classification indicates the water does not meet water-quality criteria for one or more of the designated uses. The state's goal is Class SB.

3.6 Water Supply

The subject site and vicinity are supplied potable water by the Norwich Department of Public Utilities. Norwich Public Utilities was contacted and confirmed that there are no known private wells in the site vicinity.

There are no Community, Non Transient Non-Community, or Transient Non-Community water supply systems regulated by the CT Department of Public Health in the site vicinity¹⁴.

¹³ CTDEEP 1986 Water Quality Classifications Map- Thames, Pawcatuck and Southeast Coastal Basins.

¹⁴ CTDPH website-

4. Summary of Previous Investigations

A Phase I Environmental Site Assessment dated November 29, 2006 was prepared for the property owner by Geoscience Technical Services, Inc. The report identified the following areas of concern, which are repeated verbatim below:

- Areas where spills are documented and where tanks have or may have leaked.
- Underground product transfer lines.
- Locations where lubricating oils or other petroleum products have been used and stored.
- The area where water from the leakage collection system oil water separator was injected into the ground.
- The dry well receiving discharges from garage floor drains.
- Soil from the standpoints of possible origin as fill and metals from the former silver companies.
- Site groundwater that may be impacted by petroleum and metals.
- Any investigation would have to include provisions for determining whether contaminants with offsite origins are reaching the property.

Other previous spill or underground storage tank (UST) related investigation reports, obtained from CTDEEP files, are summarized in Section 5.2.

5. Environmental Records Review

The terms CTDEP and CTDEEP (formerly CTDEP) are used in this report based on which environmental agency was in place at the time of the incident or record.

5.1 Environmental Database Search

The following standard, environmental record sources have been reviewed. The approximate minimum search distances from the subject site are shown as follows. Some search distances were modified based on the urban nature of the site vicinity.

Environmental Record	Approximate Minimum Search Distance
Federal NPL & Delisted NPL Site List	1/2 mile
Federal CERCLIS List	1/2 mile
Federal CERCLIS NFRAP List	1/2 mile
Federal RCRA TSD Facilities List	1/2 mile
Federal RCRA Generators List	1/2 mile
Federal RCRA CORRACTs List	1/2 mile
Federal ERNS List	1/8 mile
Federal FINDs List	1/8 mile
Federal/State/Tribal Engineering & Institutional Controls	1/2 mile
State/Tribal List of Hazardous Waste Sites	1/2 mile
State/Tribal Site Discovery and Assessment Database	1/2 mile
State/Tribal Voluntary Remediation Program	1/2 mile
State/Tribal Landfill and/or Solid Waste Disposal Sites	1/2 mile
State/Tribal Leaking Underground Storage Tank List	1/2 mile
State/Tribal Registered Underground Storage Tank Information	1/4 mile
State Spills	1/8 mile
State/Tribal Brownfields Sites	1/2 mile
CTDEEP Leachate and Wastewater Discharge Source	Site
Municipal Records	Site

The environmental data search was conducted by Environmental Data Resources, Inc. (EDR). The EDR report is included in Appendix D. A summary of the results is provided herein. For additional details about the search and findings, refer to the provided report. Other database search results, which are not summarized below, are provided in the report.

5.1.1 EPA National Priorities List & Delisted NPL Sites

The National Priorities (Superfund) List (NPL) is the EPA database of uncontrolled or abandoned hazardous waste sites identified for priority remedial actions under the Superfund Program.

The subject property (including sites within the specified search distance) is not listed on the NPL or Delisted NPL.

5.1.2 EPA Comprehensive Environmental Response, Compensation, and Liability Information System (CERCLIS)

CERCLIS contains data on potentially hazardous waste sites that have been reported to the EPA by states, municipalities, private companies, and private persons, pursuant to Section 103 of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA). CERCLIS contains sites that are proposed either for, or on the NPL, and sites that are in the screening and assessment phase for possible inclusion on the NPL. CERCLIS sites designated "No Further Remedial Action Planned" (NFRAP) have been removed from CERCLIS.

The subject property (including sites within the specified search distances) is not listed as a CERCLIS or CERCLIS NFRAP site.

5.1.3 Resource Conservation and Recovery Information System (RCRIS)

The Resource Conservation and Recovery Act (RCRA) database includes select information on sites that generate, store, treat, or dispose of hazardous waste as defined by the Act. These sites are referred to as hazardous waste generators (small and large quantity) and treatment, storage, and/or disposal facilities (TSDF).

The subject property (including sites within the specified search distances) is not listed in the EDR report as a RCRA generator or RCRA TSDF site.

CTDEEP files had two records of hazardous waste generation for Lehigh Oil at 1 Terminal Way under generator number CTP000029591 as follows:

- Gasoline (including gasohol) (DOO1) 834 gallons on October 5, 2006.
- Gasoline (including gasohol) (DOO1) 315 gallons on October 9, 2006.

Peter Castle indicated the waste gasoline was generated from the bulk storage terminal at 296 West Thames Street and the product line under Terminal Way, during decommissioning of these facilities; the waste was not generated on the subject property.

5.1.4 RCRA Corrective Action Report (CORRACTS)

CORRACTS identifies hazardous waste handlers with RCRA corrective action activity.

There were no identified CORRACTS sites within the specified search distance.

5.1.5 EPA Emergency Response Notification System (ERNS) List

The ERNS List is a database of information on the sudden and/or accidental release of hazardous substances, including petroleum. This list includes facility spill information reported to the EPA and to the Coast Guard (National Response Center).

The subject property has one ERNS record as follows:

- March 12, 1996 –Shipping Street at Terminal Way- *Material contained in catch basin- a lot of sand was in catch basin. CTDEP is placing sorbent pads in the catch basin- shoveling up sand in the catch basin. CTDEP hired AET for clean-up. Catch basing (sic) leads to Thomas (sic) River.*

5.1.6 Federal FINDS List

The Facility Index System/Facility Registry System (FINDS) is an integrated compliance information system providing enforcement and compliance information across most EPA programs.

Lehigh Oil is on the FINDS list for unspecified environmental records, most likely for the ERNS incident.

5.1.7 Federal/Tribal/State Engineering & Institutional Controls

There were no federal, tribal or state engineering or institutional controls listed for the site or sites within the specified search distance.

5.1.8 State/Tribal Hazardous Waste List

The CTDEEP compiled an inventory of sites in Connecticut (State equivalent CERCLIS). The inventory is used to identify toxic or hazardous waste disposal sites, and to determine the type and amount of such wastes at each site. The inventory does not assess the effect that the sites may present to public health or the environment. This inventory identifies sites that have been used for disposal to prioritize them for the implementation of appropriate cleanup measures.

The subject property (including sites within the specified search distances) is not on the state/tribal hazardous waste list.

5.1.9 State/Tribal Site Discovery and Assessment Database (SDADB)

These are sites reported to CTDEEP where release of hazardous waste or petroleum products may have occurred, including a list of Contaminated or Potentially Contaminated Sites (CPCS).

The subject property is included on the SDADB list (March 2, 1998) related to a leaking UST. Chemicals of concern are listed as non-chlorinated volatile organic compounds and semi-volatile organic compounds. This appears to be related to the 500 gallon gasoline vapor UST removed in September 1997. Additional documentation is provided in this report.

Two additional sites within the search distance are included as follows:

- Thames/Laurel Hill LTD Partnership, One Thermos Avenue (opposite side Thames River).
- Falvey Motors 395 West Thames Street (one-half mile southwest of site).

Based on the location of the properties with respect to the subject site, no impacts to the subject site are anticipated.

5.1.10 State/Tribal Property Transfer/Voluntary Cleanup Site

These are sites that have entered into a CTDEEP voluntary remediation program or the CTDEEP Property Transfer Program.

The subject property has not entered into the CTDEEP Transfer Act or Voluntary Remediation Programs.

The former United Metals at 26 Shipping Street, owned by the City of Norwich, entered into the CTDEEP Voluntary Remediation Program in December 2008.

5.1.11 State/Tribal Landfill List

The subject property (including sites within the specified search distances) is not listed on this database.

5.1.12 State/Tribal Leaking Underground Storage Tank (LUST) List

The subject property is listed on this database. CTDEEP LUST records (September 4, 1997) indicate a 550-gallon kerosene UST and a 2000-gallon fuel oil UST as LUSTs. The LUST report indicates the USTs were removed (Service Station Equipment) and soil removed. The status is listed as *Cleanup Initiated*. Note UST sizes and contents are not consistent between various CTDEEP reports and UST notification forms as subsequently discussed.

Other listed LUST sites are included in the EDR report. The most relevant is for 24 (sic) Shipping Street, City of Norwich. This listing relates to the removal of a 4000 gallon # 6 fuel oil UST in September 2009. Oversight and documentation was provided by Paul Burgess, LLC. The EDR report states *LUST Completed*, although the Paul Burgess, LLC report states a release was detected that will be handled under the Voluntary Remediation Program. Groundwater sampling at this site conducted in December 2007 did not detect chemicals above CTDEEP criteria.

5.1.13 State/Tribal Registered Underground Storage Tanks

There are five registered USTs on the subject property and indicated as removed. A complete discussion of USTs is provided in Section 7.12.1 of this report.

5.1.14 State Spills Records

There are numerous spill records on file for the subject site. Spill reports and other CTDEEP records are as summarized in Section 5.2.

5.1.15 State/Tribal Brownfields Sites

The subject property is not listed on the State/Tribal Brownfields site database. The 26 Shipping Street site is listed as a Brownfield site and has received a USEPA Brownfields grant.

5.1.16 CTDEEP Leachate and Wastewater Discharge Sources

The CTDEEP Leachate and Wastewater Discharge Sources list is an inventory of surface and groundwater discharge sources and other potential environmental areas of concern (e.g., spills, landfills, septage lagoons).

The subject site is not on this database.

5.2 Connecticut Department of Energy & Environmental Protection

A review of specific CTDEEP files was conducted on February 6, 2013. The following property owners and businesses were included in the CTDEEP file search:

- Lehigh Petroleum Supply Limited Partnership
- Eastern Connecticut Petroleum Supply Corp.
- Lehigh Oil Company

Site-specific file information (including, but not limited to, orders, environmental reports, site analytical data, permits, application forms, and other correspondence) was requested regarding

the current/former owners and businesses listed above. The CTDEEP file information is included in Appendix D and is summarized below in chronological order, (other EDR information is included in this summary):

Date	Document	Discussion
8/7/1969	CT Water Resources Commission	Describes Lehigh operations (sales, service, maintenance, truck washing & exterior steam cleaning). Wastes contain oil, grease, and solvents.
May 1973	CTDEP Order to Lehigh	Required construction to correct potential sources of pollution. <i>(Note- apparently, spill recovery/containment system construction was apparent response.)</i>
1/17/1974	CTDEP Memo	Oil Leak (50 gallons) in Thames River from Barge preparing to unload at Lehigh Terminal (likely property to south).
2/5/1974	CTDEP Spill Report	Fuel oil spill (100 gallons) from train at Lehigh crossing (foot of Shipping St). Train hit truck.
12/30/1974	CTTDEP Spill Report	Gas release to river from 2 @ 4000 gallon USTs. Unclear if subject property or former Lehigh terminal to south. List Lehigh Bottle Gas, which was not onsite.
12/4/1975	CTDEP Spill Report	Fuel oil spill (20 gallons) from tractor trailer. Cleanup conducted.
2/16/1978	CTDEP Memo	CTDEP soil borings and soil sampling at site. Oil source thought to be from pumping station or oil lines to distribution island. <i>(Note- a standpipe for petroleum recovery apparently installed at this time.)</i>
3/13/1978	CTDEP Spill Report	Gas release (200 gallons) at stand pipe possibly from gasoline recovery system. Gas recovered from stand pipe.
5/8/1978	CTDEP Memo	Compliant about Lehigh and others discharging raw sewage to river.
8/19/1978	CTDEP Lab Report	Groundwater sample from monitoring well at southwest corner of site. No hydrocarbons detected..
10/1978	US Coast Guard Report	Two feet of oil in scavenger holding tank. Boomed off area was clean.
11/1978	US Coast Guard Report	Two feet of oil in scavenger holding tank. Slight trace of oil at boom area at discharge of drain line.
2/28/1979	CTDEP Spill Report	Fuel oil release (700 gallons) at unloading area. Oil vacuumed and Speedi Dry applied.
3/1979	CTDEP Spill Report	Fuel Oil – no further details.
8/1979	US Coast Guard Report	Scavenger system turned off to see if system still needed. No oil in boom area.
10/30/1979	CTDEP Spill Report	Gasoline release (50 gallons) due to valve leak.
1/28&29/1980	CTDEP Spill Report	Gasoline (regular) release (5000 gallons) due to crack in transfer line to loading dock. Reactivated collection

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Date	Document	Discussion
		system to remove gas for groundwater.
7/1980	US Coast Guard Report	Lehigh reported scavenger holding tank overflowed due to heavy rain. Estimated 15-20 gallons oil to river.
11/22/1980	CTDEP Spill Report	Gasoline release (50-75 gallons) due to open valve.
2/4/1988	CTDEP Spill Report	Fuel oil release (75 gallons) due to equipment failure. Sorbents used and removed. Spill status- closed.
10/14/1988	CTDEP Spill Report	Gasoline release noted during UST removal. Spill status open. (UST A1)
9/1990	Lenard Engineering (consultant to Lehigh)	Describes plan to investigate and remediate historic contamination at the site.
1-31-91	CTDEP Spill Report	Fuel oil release (50 gallons) to site and roadway pavement from delivery truck. Speedi Dry used and disposed. CTDEP did not require further action.
1/3/1994	CTDEP Spill Report	Fuel oil release (quantity not specified) due to minor dispenser leak. Runoff to embankment.
4/13/1994	CTDEP Spill Report	Ongoing oil release from transfer pump to loading rack. Soil remediation conducted.
12/21/1994	Fuss & O'Neill Letter to CTDEP	Describes investigation and further remediation of 4/13/1994 spill report.
3/12/1996	ERNS Report	Shipping Street at Terminal Way- <i>Material contained in catch basin- a lot of sand was in catch basin. CTDEP is placing sorbent pads in the catch basin- shoveling up sand in the catch basin. CTDEP hired AET for clean-up. Catch basing (sic) leads to Thomas (sic) River.</i>
9-/4/1997	CTDEP Spill Report (97-4959)	Describes CTDEP oversight when 2000 gallon gasoline containment and 550 gallon fuel oil USTs (behind office building) removed. Fuel oil UST had "minimal contamination" and the gasoline vapor UST had "contaminated soils with a strong weathered gasoline odor". Note these UST capacities conflict with final UST Notification Form and the Spill report appears incorrect.
9/16/1997	Service Station Eqp. Lab Report	The above gasoline vapor UST detected petroleum hydrocarbons in soils (<2500 parts per million(ppm)). The fuel oil UST had petroleum hydrocarbons less than 500 ppm.
1/12/1998	CTDEP Spill Referral (97-4959) to LUST Program	UST failure & groundwater contamination.
1/14/1998	Recon Engineers Report	Describes removal of UST EI (500 gallon- previously noted as 2000 gal.) vapor recovery for loading rack. Service Station Eqp. removed 60 tons of contaminated soil. Recon collected groundwater sample from grave and

Date	Document	Discussion
		soil confirmation samples after soil excavation. Groundwater sample had elevated levels of gasoline constituents above regulatory standards. Soil analytical results for petroleum hydrocarbons were below numeric criteria (2500 ppm) for commercial/industrial areas.
3/2/1998	CTDEP Site Investigation Summary Sheet	Site summary- no recommendations provided.
6/17/1999	CTDEP Spill Report	Metal Processing Inc. released coolant/cutting oil (20 gallon) near loading dock.
8/6/1999	Louriero Engineering Report	Documents soil remediation (51 tons) related to 6/17/1999 release.

5.3 Municipal Environmental Regulatory Review

Environmental files were requested and reviewed at the City of Norwich Building Department, Norwich Fire Marshal's office and the Uncas Health District. Relevant Building and Health Department file information is summarized below.

The Norwich Building Department has the following relevant files:

- September 6, 1974, Building Permit, Build 30'x40' addition to main building for use as auxiliary building (one story concrete block). *Note-appears to be Hanger building.*
- March 18, 1976, Building Permit, Build concrete pad (8'x30') in the gas & oil bulk plant for gas vapor recovery unit and install steel recovery tank (10.5'x 31' high).
- May 5, 1981, Building Permit, Construct storage structure (28'x21').
- November 1, 1994, Building Permit, Relocate existing truck rack to area adjacent to tanks per plan. *Note- property to south.*
- July 12, 1994, Zoning Board of Appeals submittal, Construct a two bay loading rack on Lehigh property, 500 feet south of subject site and eliminate loading dock at subject site.
- January 1, 1995, Electrical Permit, Install new service and controls on new loading dock. *Offsite at property to south.*
- February 8, 1995, Norwich Building Permit letter to Metal Process Assistance regarding use of building.
- August 19, 1997, Fuel Storage Tank Permit, Remove 2000 gallon UST oil tank and 500 gallon vapor recovery UST, Service Station Equipment.

The Norwich Fire Marshal's office had the UST registration form on file. Tank Removal Logs were on file for the fuel oil and gasoline vapor recovery USTs removal (September 4, 1997). The logs noted the USTs were removed, contamination was found at each UST, and CTDEEP was notified.

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Uncas Health District had no records of the site being connected to the municipal sewer system and no records of onsite septic systems.

6. Interviews

Requested information included knowledge or documentation regarding any past local, state, or federal environmental inspections of the site; any environmental correspondence, orders, violations, liens or institutional controls regarding the property; any past or ongoing releases of hazardous substances or petroleum products; or any other relevant information that would suggest the potential presence of a recognized environmental condition.

Peter Castle, property owner representative, was interviewed. Mr. Castle was a manager onsite from circa 1974 through circa 1998. He indicated to his knowledge there have been no environmental orders, cleanup liens or activity and land use limitations filed or recorded for the subject site. He was not aware of the 1973 CTDEP order. He was generally aware of the various spills reported to CTDEEP and the USTs removed from the site. The 2006 Geoscience Phase I ESA was provided.

7. Site Reconnaissance

The objective of the site is to inspect the subject property and accessible areas of adjacent properties to determine the presence or potential of a release of hazardous substances or petroleum products in order to identify recognized environmental conditions.

7.1 Inspection Personnel

Paul Burgess, P.E., LEP, of Paul Burgess, LLC, inspected the property on February 8, 21 & 26, 2013. On February 21, 2013, Peter Castle (property owner representative) and John Podurgiel (former terminal manager/employee circa early 1960s to 1997.) accompanied Paul Burgess on the site inspection. Photographs are included in Appendix E.

7.2 Site Description and Observation

7.2.1 Site Description

The three acre property (approximate from property dimensions) is located at 1 Terminal Way and abuts the Thames River. There are four masonry structures onsite generally surrounded by pavement: the Warehouse structure fronting Terminal Way, the Office building attached and perpendicular to Terminal Way, the Garage structure on the north side of the property, and a centrally located Boiler/Hanger building. Remnants of the petroleum loading racks (vapor recovery structure, concrete pads, containment facilities, oil water separator) are located on the south side of the property. Petroleum product was pumped to the site, via underground pipes below Terminal Way, from a bulk storage terminal located south of the site at 296 West Thames Street.

7.2.2 Site Drainage

The only onsite catch basins observed were associated with the former loading/unloading rack spill collection system. Surface water runoff generally flows over the site pavement and discharges as runoff to the Thames River. Available maps at the Norwich Public Works Department indicate a storm drainage pipe from Shipping Street flows to the Thames River along the southern property line.

The terminal layout and spill containment system is shown on Figure 3. This map is from CTDEEP files. Spills and rainwater were collected in grates and sumps (some metal covers visible in field), and piped to subgrade concrete collection tanks. The collected water was pumped to an oil water separator facility off the east end of the office building. Collected petroleum products were discharged to a subgrade UST (ID C-1). Water was piped to a dry well located near the northeast corner of the office building. The terminal had a gasoline vapor

recovery system used during tank truck loading operations. Collected gasoline residual product was stored in an above ground storage tank (AST) above the vapor recovery structure.¹⁵

A large diameter standpipe is present on the south side of the property in the former petroleum loading rack area. It was formerly used to recover spilled petroleum product from the groundwater.

7.3 Building Inspections

7.3.1 Warehouse

The Warehouse building is a long masonry structure that parallels Terminal Way and the railroad tracks. The estimated constructed date is the mid 1800s and the estimated size is approximately 12,000 square feet (based on dimensions from the assessor's card). The majority of former equipment or stored materials have been removed. It is served by a rear (east) loading dock with two interior concrete loading/unloading ramps. An overhead door also provides access on the south side of the building. Various former electrical components have been significantly vandalized for scrap. The lack of natural light made the interior inspection limited. There were two empty 275 gallon fuel oil ASTs inside the building, which formerly supplied fuel to ceiling mounted heating units.

Historically, various operations included grinding and polishing associated with Norwich Cutlery and International Silver. A machine shop and a boiler were located adjacent and east of the warehouse structure near the current loading dock. Lehigh used this building for petroleum product storage (principally pre-package motor fluid cans for use at offsite service stations). The most recent tenant was Metal Processing Assistance, a wire drawing facility.

7.3.2 Office

The Office building connects to the Warehouse (south end) and extends perpendicular to Terminal Way towards the Thames River. It is approximately 8,800 square feet based on dimensions from the assessor's card. It has a crawl space (dirt floor) basement under most of the building. The crawl space was not inspected (less than three feet high), but was observed via an access panel below the office floor. Piping was observed in the crawl space. The office building contained former offices, bathrooms, kitchen and electric/computer room. A large wash sink was present in the men's restroom, formerly used by Lehigh maintenance employees and drivers. In the southwest corner of the building, remaining controls for the outside petroleum terminal facility were observed, as well as electric power supply components. Various former electrical components have been significantly vandalized for scrap.

¹⁵ Discussions with Peter Castle and John Podurgiel. It is unclear how UST E1 (noted as gasoline vapor recovery) functioned.

This building was constructed circa 1909 during the occupancy of International Silver, when it was used for finishing and sizing, and was subsequently used by Lehigh as office space.

7.3.3 Garage

This is a one-story brick structure previously used by Lehigh for vehicle maintenance and washing, and historically by Norwich Cutlery and International Silver as a forge shop. Lehigh conducted vehicle painting in the western bays (east side).¹⁶ Assessor's records indicate the garage floor area is 8844 square feet. It contains five large work bays (three west side and two east side), concrete floors, and a number of overhead access doors. A parts room and office existed on the northeast side of the western bays. Ceiling material has fallen on the floor. An empty 275 gallon fuel oil AST is located in the western bays and a former 275 empty fuel oil AST was located in the eastern bays (both associated with former fuel oil burners for heat).

Within the western bays there is a concrete lined trench drain formerly used to collect vehicle wash waters. The August 7, 1969 CT Water Resources Commission inspection report depicts this trench floor drain discharging to a floor drain (observed in the eastern bays), then subsequently to the Thames River. Mr. Podurgiel and Mr. Castle indicated the floor drains discharge to a dry well near the south east corner of the garage. They were not aware of the previous river discharge. The 2006 Geoscience Phase I ESA noted four 55-gallon fuel oil drums were stored in this area from the Metal Assistance operation; they were no longer present.

Floor staining was observed in the eastern bays as shown on Figure 2 and in the provided photographs. Various containers of chemical products were stored on the floor nearby. Mr. Podurgiel speculated this was caused by petroleum storage by Metal Processing (former tenant). A small exterior concrete wall containment system was observed outside the eastern bays. Mr. Podurgiel indicated a former 275 gallon AST was once located above the containments system and was used by Lehigh service mechanics to dispose of excess fuel oil generated from offsite service calls.

7.3.4 Boiler/Hanger

This is a one-story concrete block structure with concrete floors, previously used by Lehigh Oil as a boiler room and parts storage. The Hanger building was originally used for storage of a helicopter. The hanger portion of the building is accessed by a large overhead door on the east side. Assessor's records indicate the garage floor area is 1800 square feet.

¹⁶ John Podurgiel.

The boiler is still present and was served by a fuel oil UST outside the building. A shower area existed on the east side of the boiler building (three shower sumps with drains). No floor drains were observed in the building, with the exception of the showers. An empty 275 gallon fuel oil AST was present on the north side of the hanger building, which served a separate furnace in that area. The 2006 Phase I ESA documented one 55 gallon drum (waste oil and associated floor staining) and one 55 gallon drum (lube oil) in this building. A transformer (appeared to be dry type) was observed on the floor of the Hanger building.

7.4 Sanitary Sewer

Norwich Public Utilities had no records of the onsite structures being connected to the sanitary sewer. Other file information confirms past sanitary discharges are to the Thames River. A map obtained from the Norwich Public Works Department shows two wastewater discharges to the river: one from the Garage floor drains and one from the Office restrooms.¹⁷

7.5 Observed Interior Stains or Corrosion

The building interiors had no interior stains or corrosion except for the petroleum floor stains noted in the eastern bay of the Garage building. Inspection of the floor in the Warehouse building was limited by availability of natural light. The 2006 Phase I ESA noted they appeared "grimy".

7.6 Observed Interior Drains or Sumps

Observed floor drains are discussed in Section 7.3.

7.7 Pits, Ponds, Lagoons, Odors, Stressed Vegetation

None observed.

7.8 Stained Soil or Pavement

None observed.

7.9 Solid Waste

No significant quantities of solid waste were observed onsite.

7.10 Fill

The western portion of the site is mapped as underlain by alluvium, which consists of gravel, sand, and silt.¹⁸ The eastern portion of the site is mapped as consisting of artificial fill. It

¹⁷ Map Lehigh Petroleum Engineering Dept., 1971. From Chandler Palmer King map 1958.

¹⁸ United States Geological Survey (USGS) Surficial Geology Map of the Norwich Quadrangle, 1962.

appears much of the site has historically been filled and was expanded within the Thames River bed. Slag material, indicative of fill, was observed along the river bank at the site.

7.11 Oil/Chemical Storage

Currently, chemical/petroleum storage is limited. Some chemical product storage was noted in the Garage building as previously discussed.

Metal Processing Assistance, and other similar operations, conducted wire drawing in the Warehouse building. Wire was drawn through equipment that used lubricating oil/water. Lubricating oil was stored in eleven 275 gallon (approximate size) ASTs. Used oil and sludge was stored in 55 gallon drums and were picked up by a disposal company.¹⁹

Lehigh distributed significant quantities of fuel oil and gasoline from the onsite terminal from circa 1946 through circa 1998. Other petroleum products and waste oil were stored onsite, including in USTs. Vehicle maintenance, washing and painting activities took place in the Garage building. Excess water from the spill containment system oil water separator, and floor drains in the Garage building, were discharged to dry wells. Steam cleaning of vehicles took place outside the Garage building

Service Station Equipment (late 1980s/early 1990s-petroleum facilities contractor and tank removals) and American Environmental (spill response contractor- circa 1994) likely stored petroleum products onsite, based on the nature of their business.

Norwich Cutlery and International Silver manufactured silver products onsite from circa 1892 until circa 1938. Operations included forging, etching, grinding and polishing. A machine shop, boiler and oil house were located onsite. The specific waste management practices are unknown. Silver byproduct wastes are likely.

7.12 On-Site Storage Tanks

7.12.1 Underground Storage Tanks

The following table summarizes known USTs previously onsite. It is noted that the installation date of the first known UST is 1960, and Lehigh has occupied the site since circa 1946. It is likely that other USTs exist/existed onsite. An "oil house" was noted onsite (near current Boiler/Hanger building) during the occupancy by Norwich Cutlery and International Silver. It is unclear if this was a UST or AST. In addition, available information indicates that three concrete USTs, associated with the spill containment system, exist onsite. Manholes were observed onsite to suggest these tanks are likely still present.

¹⁹ Phase I Environmental Site Assessment, Geoscience Technical Services, November 29, 2006.

Underground Storage Tanks				
Location/ID	Capacity (Gallons)	Material	Install Date	Status
Garage/(east))A1 ²⁰	4000 Gas	Steel	1960	Removed 10/1988. ²¹
Garage(west)/B1	1000 Waste Oil	Steel	1977	Removed 10/1988
Office(south)/C1	2000 Gas/Oil ²²	Steel	1978	Removed 10/1988
Garage(south)/D1	1000 Waste Oil	Steel	1960	Removed 10/1988
Loading Racks/E1	500 Gas (Vapor Recovery) ²³	Steel	1978	1983 ²⁴ Removed 9/1997 and soil cleanup conducted. ²⁵
Behind Office Building ²⁶	2000 Fuel Oil ²⁷	Steel	?	Removed 9/1997 ²⁸

7.12.2 Aboveground Storage Tanks

The following table summarizes information about known ASTs onsite. It is likely that previous ASTs existed onsite associated with former industrial operations.

Location	Capacity (Gallons)	Material	Status
Garage/(west bays- north side)	275 Fuel Oil	Steel	Existing/Empty. No longer in use.
Garage(east bays - north side)	275 Fuel Oil	Steel	No longer present.
Garage (Exterior-east bays)	275 Fuel Oil	Steel	Secondary containment. No longer present.
Hanger Building	275 Fuel Oil	Steel	Existing/Empty. No longer in use.
Warehouse	2 @ 275 Fuel Oil	Steel	Existing/Empty. No longer in use.
Warehouse	11 @ 275 Lubrication Oil	Steel	No longer present.

²⁰ Data from CTDEEP UST Notification Form filed January 22, 1998 after all USTs removed. Tank capacity and content information is not entirely consistent with other records as noted, but is believed most accurate.

²¹ No UST closure sampling or report for USTs removed in October 1988. CTDEEP spill report stated gasoline UST leak.

²² Associated with spill containment oil/water separator.

²³ Recon Engineers Report January 4, 1988.

²⁴ CTDEEP Notification form indicates last used in 1983.

²⁵ Recon Engineers report January 4, 1988.

²⁶ CTDEEP Spill report dated September 4, 1997 and site map.

²⁷ Service Station Equipment building permit and site plan.

²⁸ Recon Engineers report January 4, 1988.

7.13 Polychlorinated Biphenyls

Three transformers owned by Norwich Public Utilities existed onsite in front of the Warehouse Building. They were removed by Norwich Public Utilities in September 2009. The transformers were non-PCB.²⁹ Other onsite transformers likely predated these transformers.

²⁹ Norwich Public Utilities email response to request regarding transformer information.

8. Data Gaps

No significant data gaps were identified for this Phase I ESA.

9. Limitations

This ESA was conducted and prepared on behalf of and for the exclusive use of the City of Norwich, their lenders, and counsel. No other entity may rely upon the results of the ESA or contents of this report for any reason or purpose whatsoever.

The purpose of this ESA is to evaluate whether hazardous substances or petroleum products may be present in the environment at the site. The opinion that is provided is based on the information described in this report. Future investigations or information that was not available to Paul Burgess, LLC may result in modification of the findings of this report.

In preparing this report, Paul Burgess, LLC relied on file information provided by state and local officials, and information and representations made available to Paul Burgess, LLC at the time of the report. To the extent that such information is incomplete or inaccurate, Paul Burgess, LLC is not responsible.

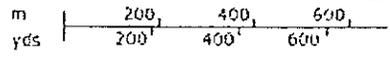
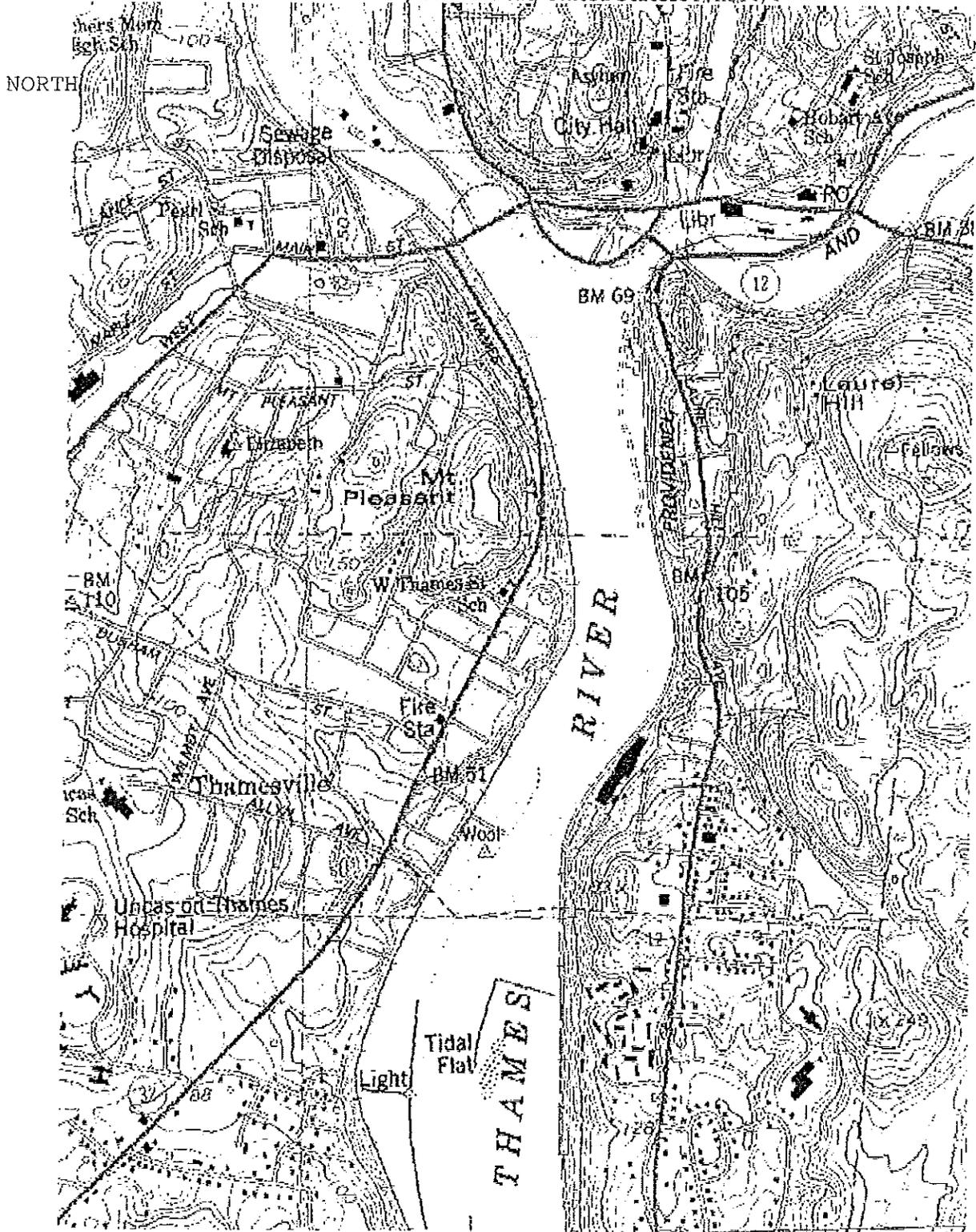
Paul Burgess, LLC performed this ESA in accordance with generally accepted practices of engineers and/or scientists providing similar services at the same time, in the same locale, and under like circumstances. No other warranty, expressed or implied, is made as to the professional opinions included by Paul Burgess, LLC in this report.

PHASE I ENVIRONMENTAL SITE ASSESSMENT
ONE TERMINAL WAY
NORWICH, CONNECTICUT

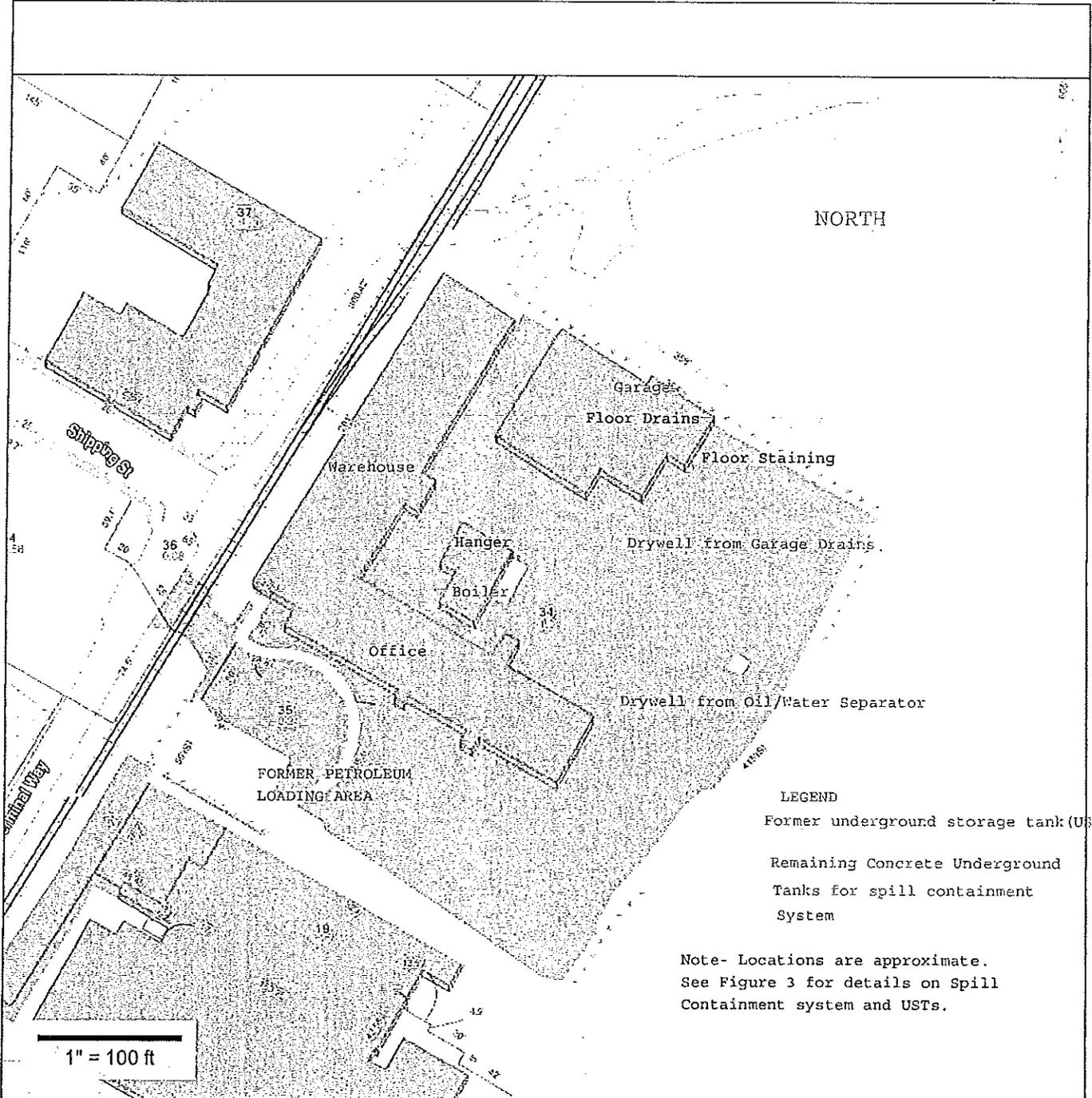
FIGURES

Send To Printer Back To MSR Maps Change to 11x17 Print Size Show Grid Lines Change to Landscape

USGS Norwich, Connecticut, United States 34#kcd1<<



lp djh#frxuhv|*i#k#k#K IV#J#xcr:j fdc#xuyh|



LEGEND
 Former underground storage tank (UST)
 Remaining Concrete Underground Tanks for spill containment System

Note- Locations are approximate.
 See Figure 3 for details on Spill Containment system and USTs.

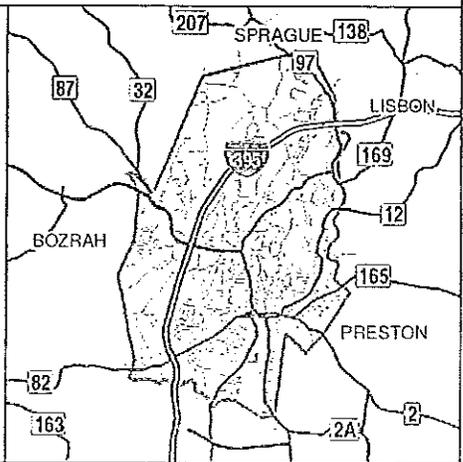
Property Information
 Property ID 117-004-034.000-0000
 Location 1 TERMINAL WAY
 Owner LEHIGH PETROLEUM SUPPLY I
 % EMMET OIL CO



**MAP FOR REFERENCE ONLY
 NOT A LEGAL DOCUMENT**

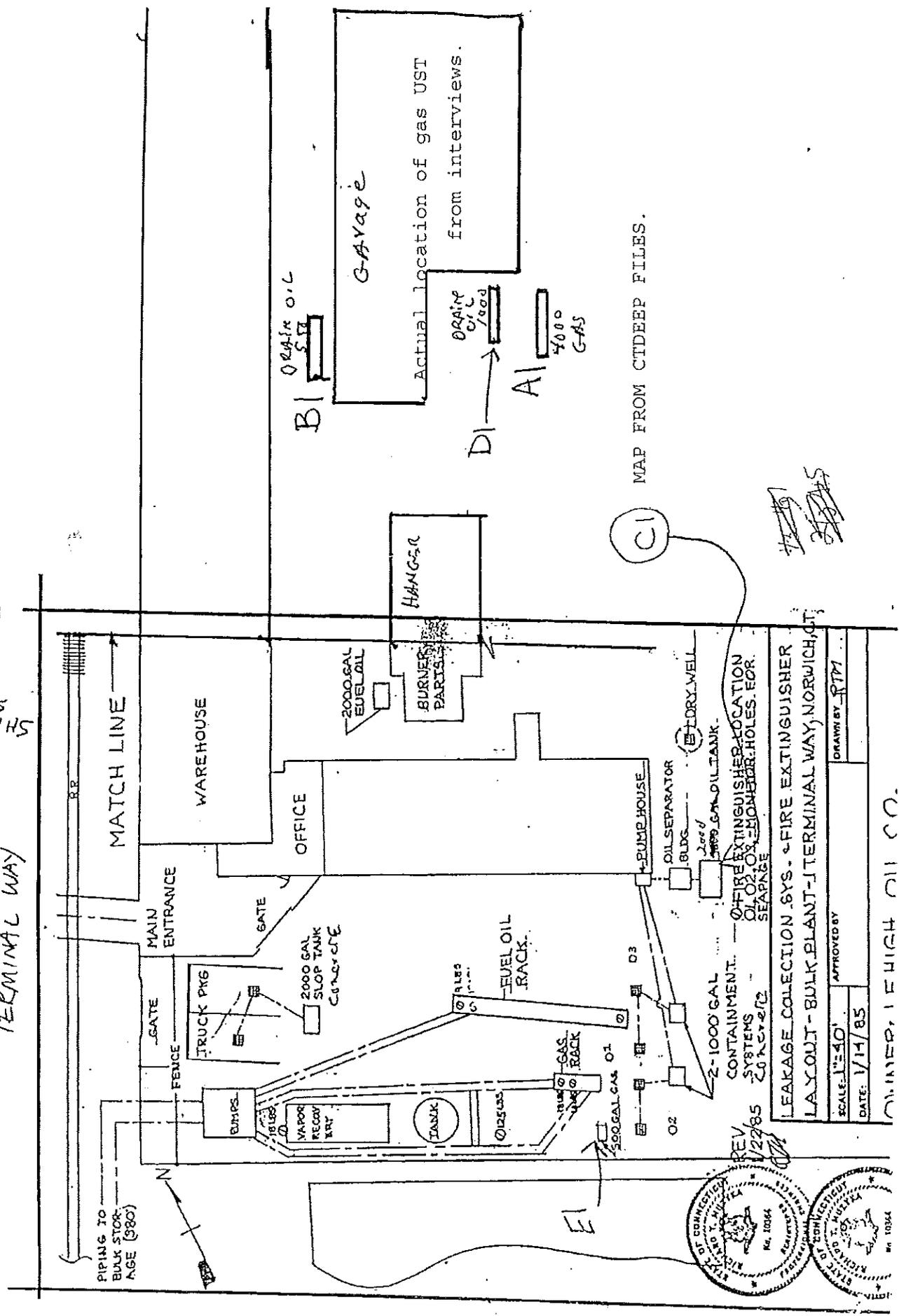
The City makes no claims and no warranties, expressed or implied, concerning the validity or accuracy of the GIS data presented on this map.

Parcels updated October 1, 2011



SHIPPING

TERMINAL WAY



MAP FROM CTDEEP FILES.

Handwritten initials/signature

CONTAINMENT SYSTEMS
 LEAKAGE COLLECTION SYS. - FIRE EXTINGUISHER
 LAYOUT - BULK PLANT - TERMINAL WAY, NORWICH, CT

SCALE: 1"=40'
 DATE: 1/14/85
 APPROVED BY: [Signature]
 DRAWN BY: RTM

UNIVERSITY HIGH OIL CO.

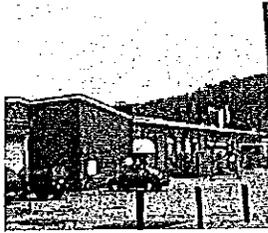


PHASE I ENVIRONMENTAL SITE ASSESSMENT
ONE TERMINAL WAY
NORWICH, CONNECTICUT

Appendix A

Assessors Records

Powered by Vision Government Solutions, Inc.



MBLU : 117/4/34/11
Location: 1 TERMINAL WAY
Owner Name: LEHIGH PETROLEUM SUPPLY INC
Account Number: 0065030001

Parcel Value

Item	Appraised Value	Assessed Value
Buildings	156,000	110,000
Xtra Bldg Features	0	0
Outbuildings	19,000	13,000
Land	83,000	58,000
Total:	258,000	181,000

Owner of Record

LEHIGH PETROLEUM SUPPLY INC
 % EMMET OIL CO
 PO BOX 266
 STONINGTON, CT 06378

Ownership History

Owner Name	Book/Page	Sale Date	Sale Price
LEHIGH PETROLEUM SUPPLY INC	0846/0323	4/20/1988	0

Land Line Valuation

Size	Zone	Appraised Value	Assessed Value
1.00 AC	WD	83,000	58,000

Construction Detail

Building # 1	MODEL Commercial	Grade C-
STYLE Light Indust	Occupancy 1	Exterior Wall 1 Brick/Masonry
Stories: 1	Roof Cover T&G/Rubber	Interior Wall 1 Minlm/Masonry
Roof Structure Flat	Heating Fuel Oil	Heating Type Hot Air-no Duc
Interior Floor 1 Concr-Finished	Bldg Use FACTORY MDL-96	Total Bedrms 00
AC Type None	1st Floor Use: 4000	Heat/AC NONE
Total Baths 0	Baths/Plumbing AVERAGE	Ceiling/Wall NONE
Frame Type MASONRY	Wall Height 14	
Rooms/Prtns AVERAGE		

Building Valuation

Living Area: 24,092 square feet	Replacement Cost: 813,233	Year Built: 1870
Depreciation: 80%	Building Value: 163,000	

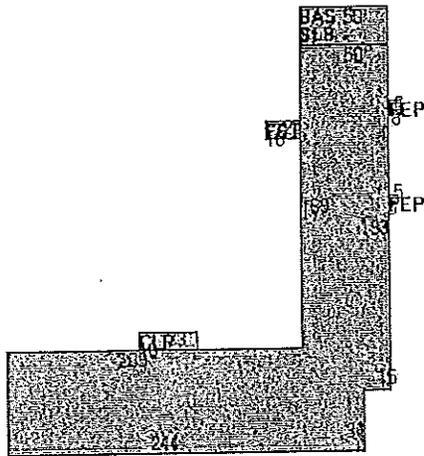
Extra Features

Code	Description	Units	Appraised Value
No Extra Building Features			

Outbuildings

Code	Description	Units	Appraised Value
PAV1	PAVING-ASPHALT	50000 S.F.	9000
FGR2	GARAGE-GOOD	8844 S.F.	9000
FGR1	GARAGE-AVE	1800 S.F.	1000

Building Sketch



Subarea Summary

Code	Description	Gross Area	Living Area
BAS	First Floor	24012	24012
CLP	Loading Platform, Finished	330	0
FEP	Porch, Enclosed, Finished	73	0
FST	Utility, Finished	200	80
SLB	Slab	1050	0

PHASE I ENVIRONMENTAL SITE ASSESSMENT
ONE TERMINAL WAY
NORWICH, CONNECTICUT

Appendix B

Deed

TO ALL PEOPLE TO WHOM THESE PRESENTS SHALL COME, GREETING:

KNOW YE, That Lehigh Petroleum Supply Limited Partnership, a limited partnership existing under the laws of the State of Connecticut, having a principal place of business in the Town of Norwich, County of New London, State of Connecticut, hereinafter referred to as the "Releasor", for the consideration of ONE DOLLAR (\$1.00) and other valuable consideration received to its full satisfaction of EASTERN CONNECTICUT PETROLEUM SUPPLY CORP., a corporation existing under the laws of the State of Connecticut, and having a mailing address of One Terminal Way, Norwich, Connecticut 06360, hereinafter referred to as the "Releasee", does hereby release and forever QUIT CLAIM unto the said Releasee and unto its successors and assigns forever, all that certain piece or parcel of land with the buildings and other improvements thereon, situated on Terminal Way in the Town of Norwich, County of New London and State of Connecticut, which property is more fully described in Schedule A which is attached hereto and made a part hereof.

Said premises are subject to building lines, if established, all laws, ordinances or governmental regulations, including building and zoning ordinances, affecting said premises, taxes on the List of October 1, 1987, and any and all sewer and water use charges not yet due and payable, which taxes and charges the Grantee hereby assumes and agrees to pay as part of the consideration of this deed.

Said premises are also subject to such encumbrances, restrictions and other matters, if any, as are set forth in the aforesaid Schedule A.

TO HAVE AND TO HOLD the premises, with the appurtenances thereof, unto the said Releasee, and unto its successors and assigns forever, so that neither the Releasor nor its successors or assigns nor any other person under it shall hereafter have any claim, right, title in or to the premises, or any part thereof, but therefrom it is and they are by these presents forever barred and excluded.

IN WITNESS WHEREOF, the said Grantor has hereunto caused this instrument to be executed this 15th day of April, 1988.

Signed, sealed and delivered
in the presence of:

LEHIGH PETROLEUM SUPPLY LIMITED
PARTNERSHIP

John J. F. [Signature]
[Signature]

Thomas Castle

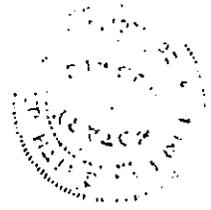
* Thomas Castle, President,
Eastern Connecticut
Petroleum Supply Corp., sole
partner of Lehigh Petroleum
Supply Limited Partnership

100 Conveyance Tax received
P. M. A. [Signature]
No Conn Tax
Town Clerk of Norwich

April 15, 1988

Personally appeared Thomas Castle, President of Eastern Connecticut Petroleum Supply Corp., sole partner of Lehigh Petroleum Supply Limited Partnership, signer and sealer of the foregoing instrument, and he acknowledged the same to be his free act and deed before me.

John R. Smith Jr.
Commissioner of the Superior Court,
Notary Public
My Commission Expires: 3/1/89



Schedule A

A certain tract or parcel of land, together with buildings thereon, situated in the Town of Norwich, County of New London and State of Connecticut and being more particularly bounded and described as follows:

Beginning at a point on the easterly line of the right of way now or formerly of the New London Northern Railroad Company and at the dividing line between this described tract and land now or formerly of the American Thermos Products company and from said point running northerly along the easterly line of said Railroad right of way about 119 feet; thence westerly 24.75 feet; thence northerly along the Railroad 281 feet, more or less, to land now or formerly of the Socony Mobile Oil Company, the last three lines bounding westerly, southerly and westerly on said Railroad land; thence easterly abutting northerly on said Socony Mobile Oil Co. land about 364 feet to the Thames River, this last line following along the fence and the southerly face of a concrete wall; thence southerly along the westerly line of the Thames River 403 feet, more or less, to land now or formerly of the American Thermos Products Co.; thence westerly along the line of the fence about 330 feet to the point of beginning, the last line bounding on said land American Thermos Products Co.

EXCEPTING THEREFROM that portion of the premises heretofore conveyed to the City of Norwich by deeds recorded in Volume 504, Pages 73 and 75 of the Norwich Land Records.

Together with the right to pass and repass over land of the Railroad which rights were reserved in deeds recorded in Volume 59, Page 605; Volume 99, Page 602; Volume 112, Page 171; Volume 113, Page 533; Volume 215, Page 96; Volume 214, Page 93; Volume 214, Page 474; Volume 217, Page 312; Volume 233, Page 433; Volume 232, Page 528; Volume 294, Page 133, and Volume 357, Page 747, of the Norwich Land Records.

Said premises are subject to:

1. Sewer line rights granted to the City of Norwich by virtue of a grant dated September 24, 1903 and recorded in Volume 122, Page 292 of the Norwich Land Records.
2. A notice of authority to convey partnership property by virtue of a notice dated October 28, 1980 and recorded in Volume 544, Page 314 of the Norwich Land Records.

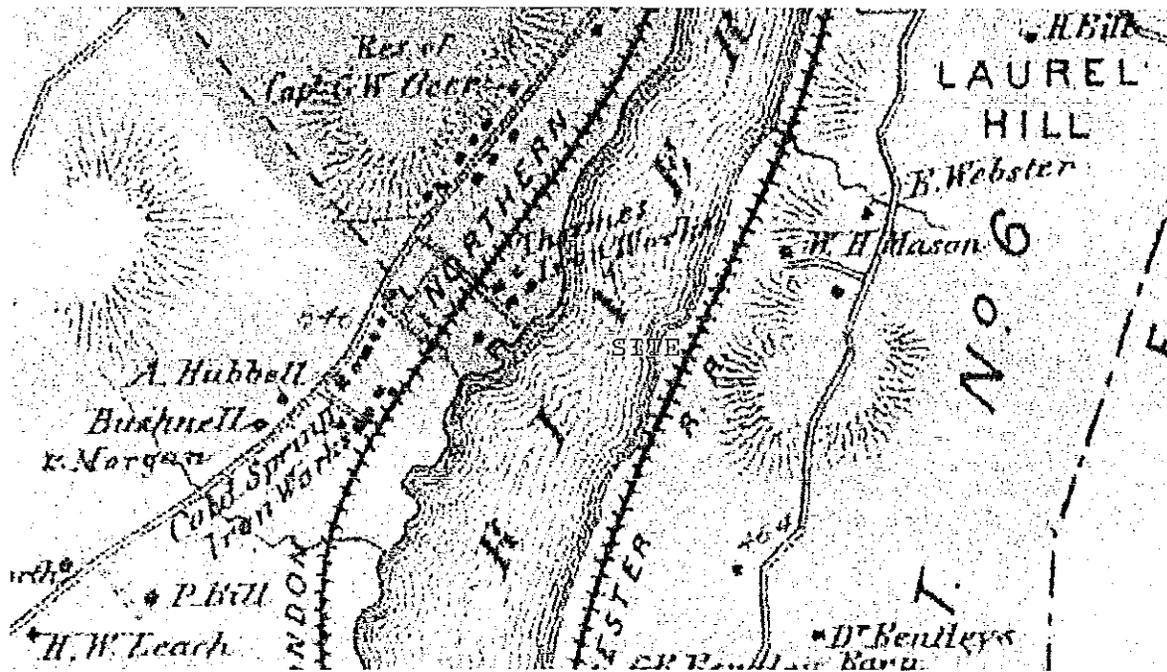
RECORDED FOR RECORD AT NORWICH, CONNECTICUT
ON 4-20-88 AT 10:32 A.M.
By: Beverly G. Hudson, Town Clerk

PHASE I ENVIRONMENTAL SITE ASSESSMENT
ONE TERMINAL WAY
NORWICH, CONNECTICUT

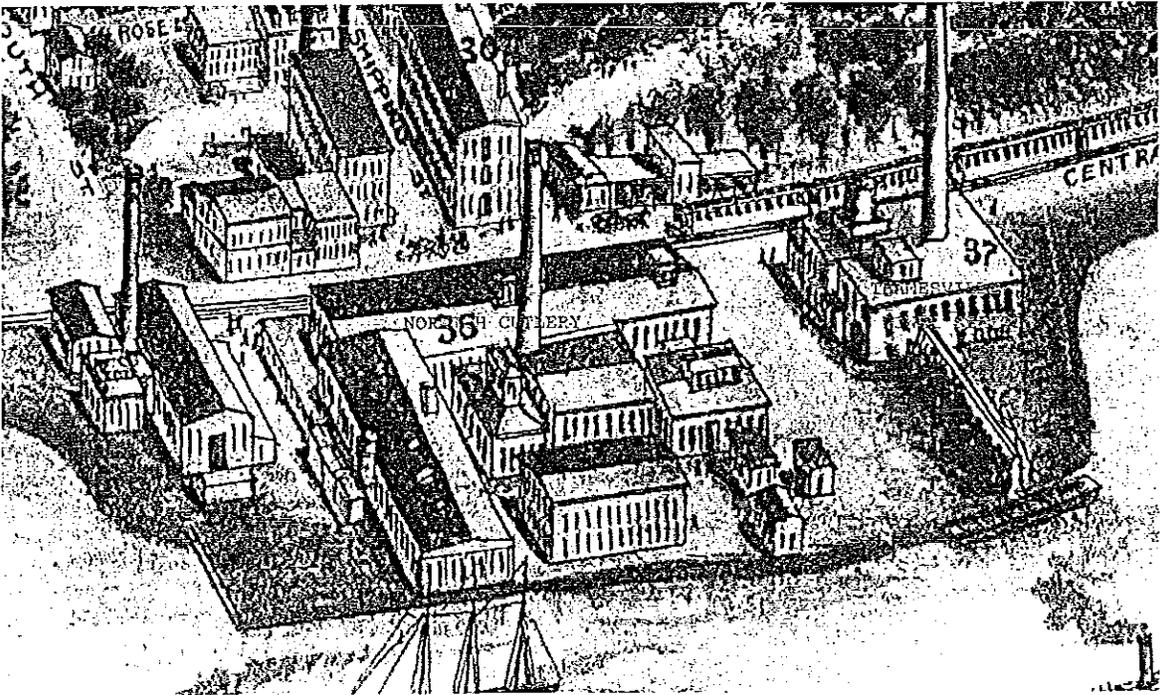
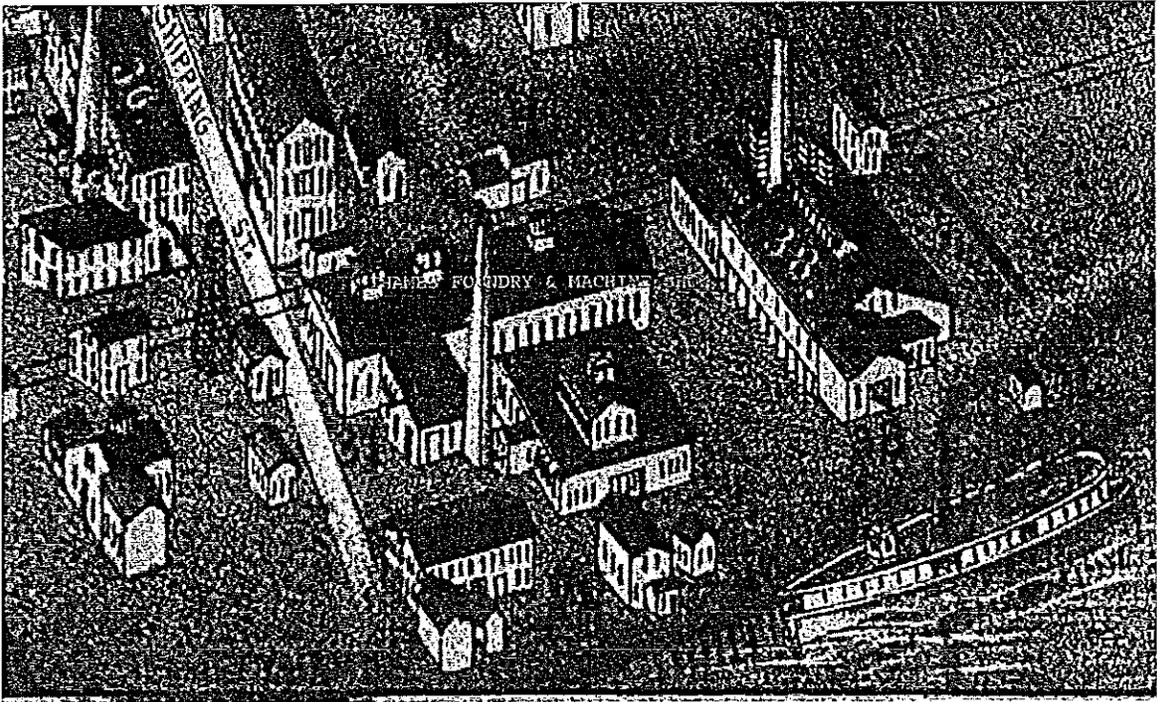
Appendix C

Site History Information

1868 PETERSON MAP



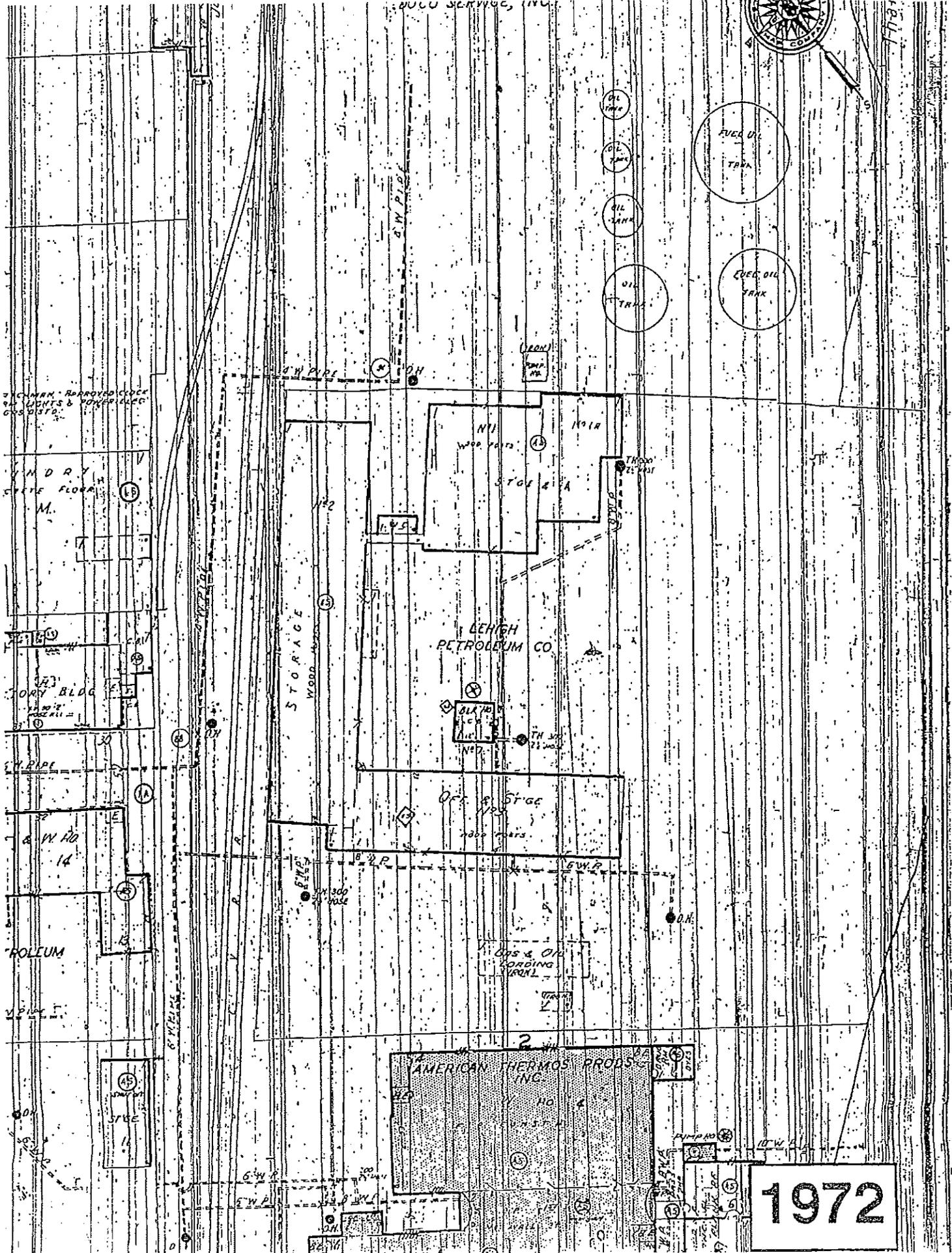
1876 LITHOGRAPH



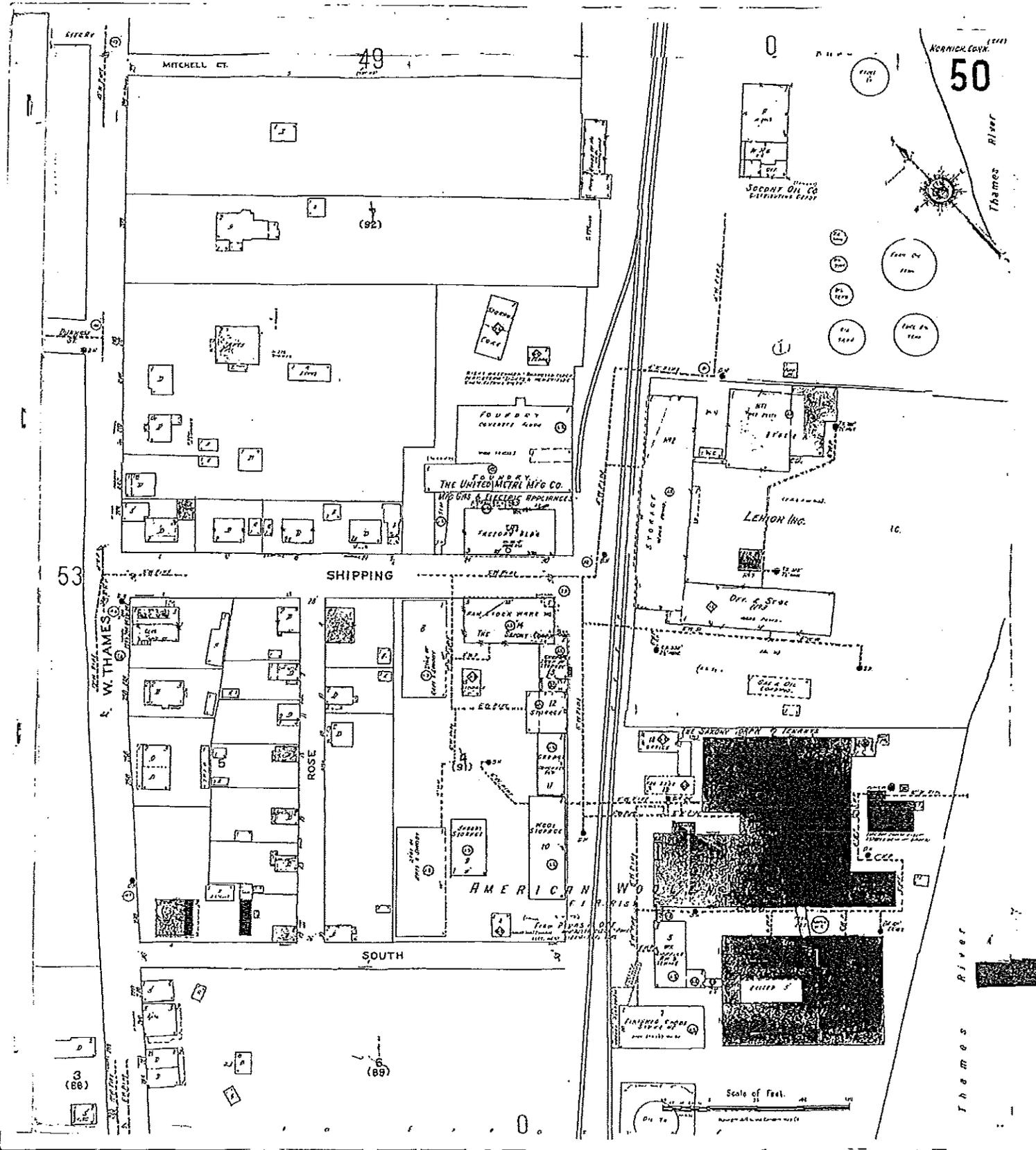
1912 AERO VIEW OF NORWICH

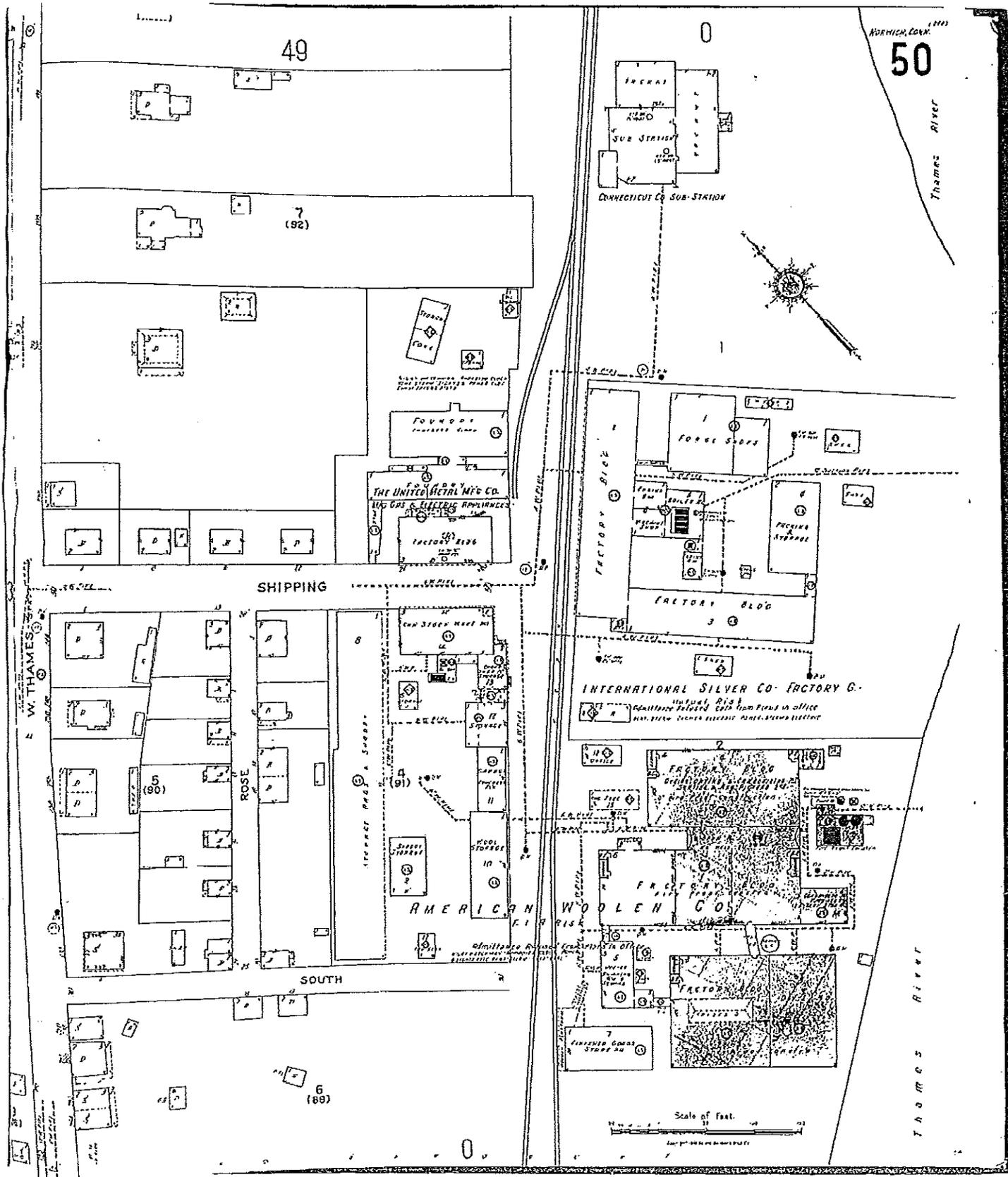


172

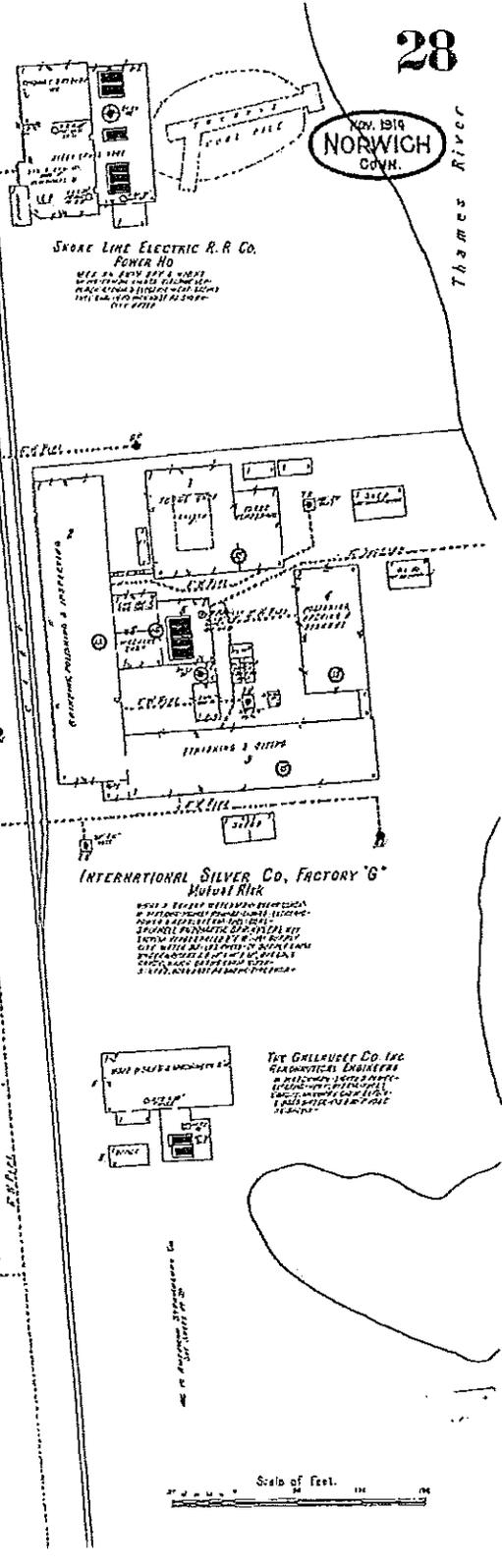
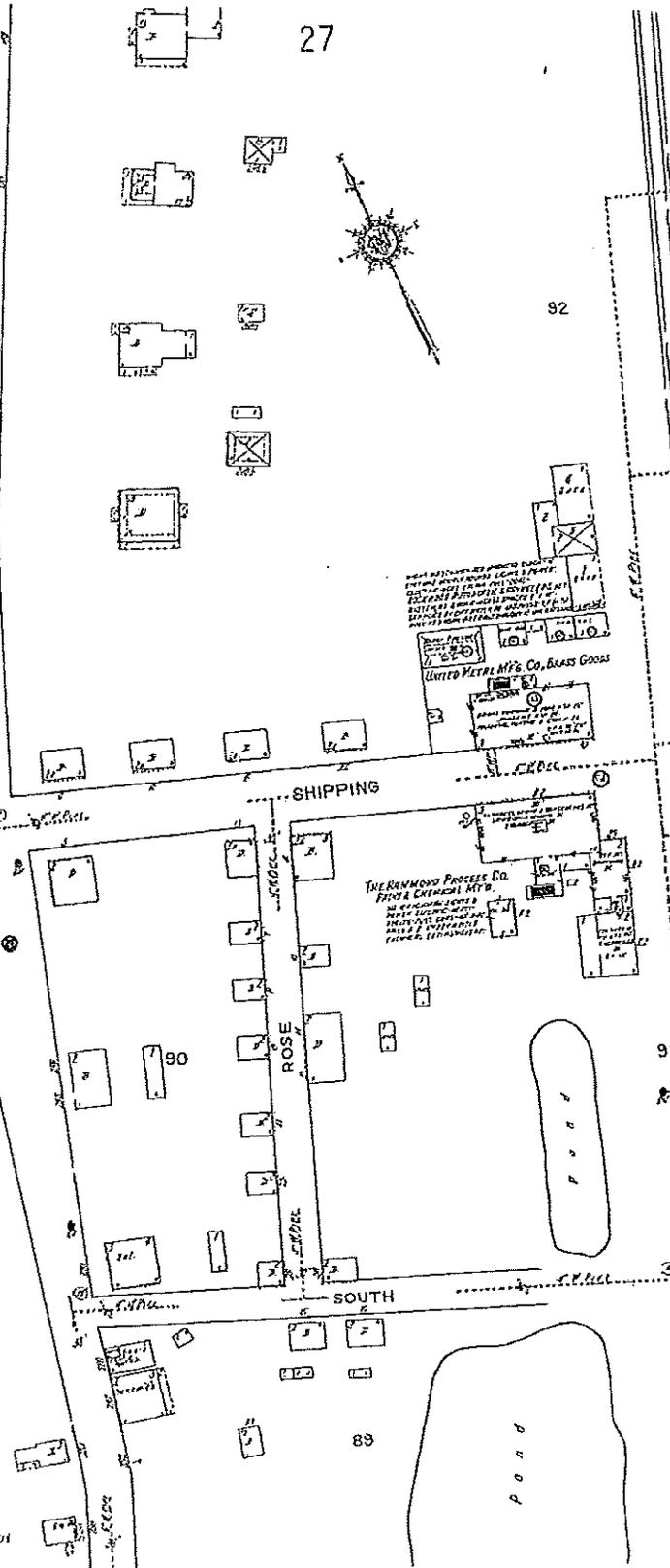


1972





W. THAMES
88
88
88



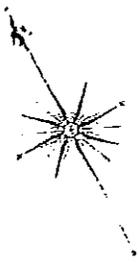
JAN 1909
NORWICH
DORSET

THE CONNECTICUT CONSOLIDATED
STREET RAILWAY CO. POWER STATION
No. 10 1911, 1912, 1913, 1914
Capacity 1,000 H.P.
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM

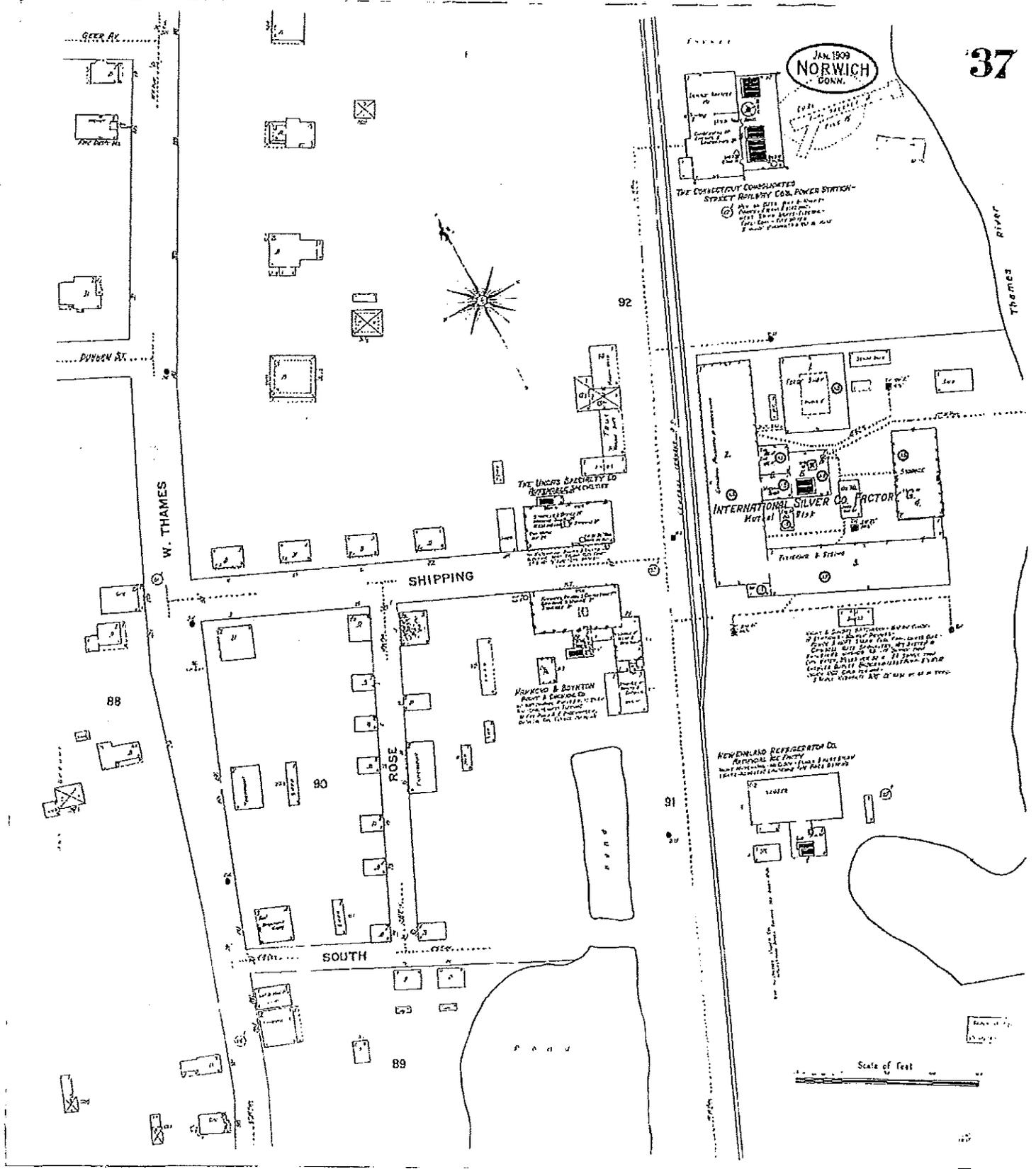
INTERNATIONAL SILVER CO. FACTORY
Hotel

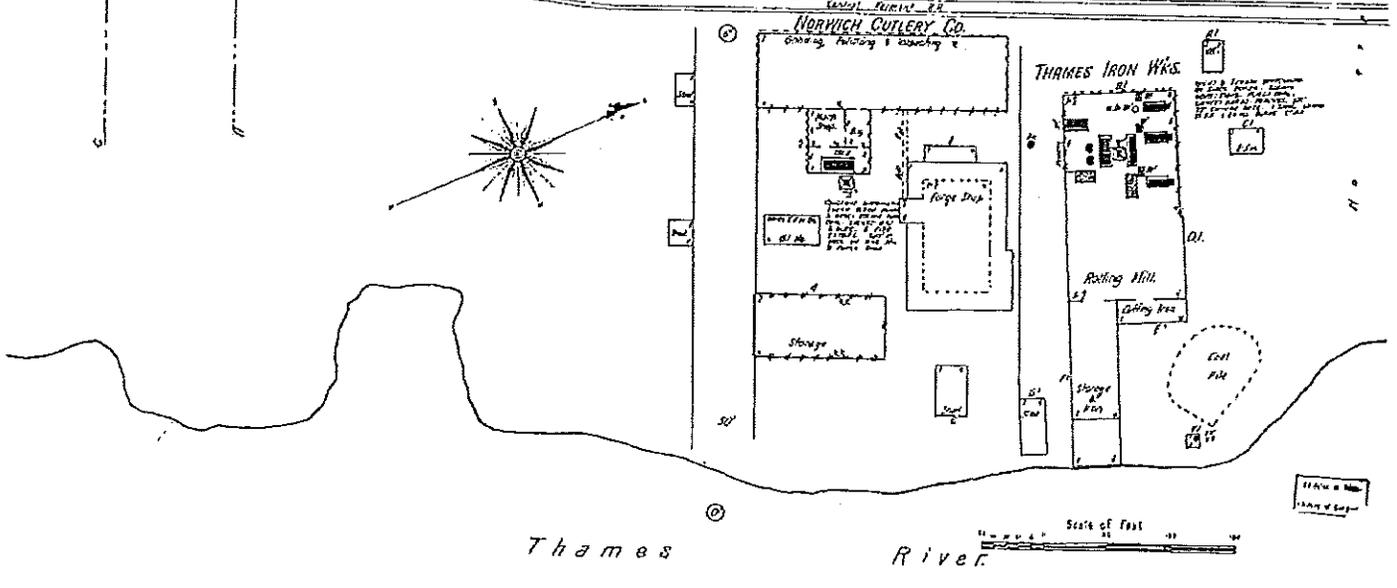
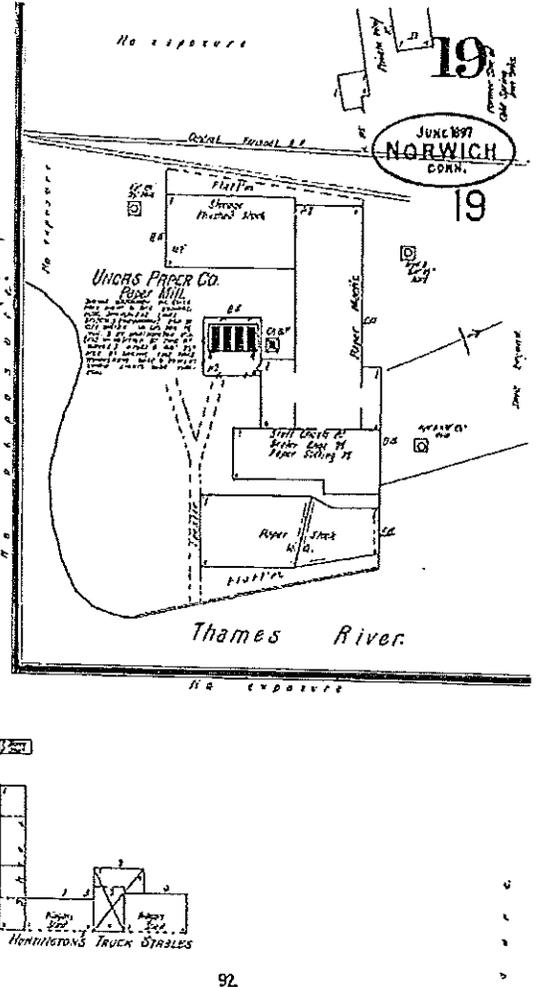
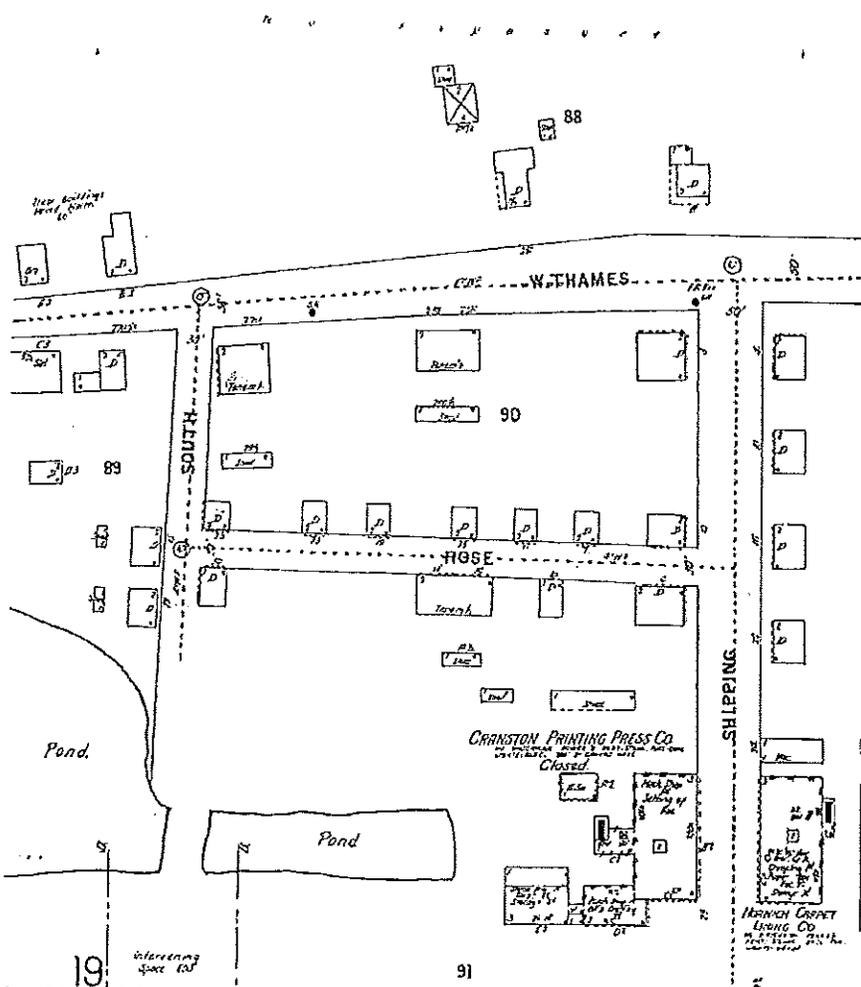
NEWENLAND REFRIGERATOR CO.
REFRIGERATOR FACTORY
No. 10 1911, 1912, 1913, 1914
Capacity 1,000 H.P.
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM

ROSE & BOYNTON
ROSE & BOYNTON CO.
No. 10 1911, 1912, 1913, 1914
Capacity 1,000 H.P.
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM
1000 V. D.C. SYSTEM



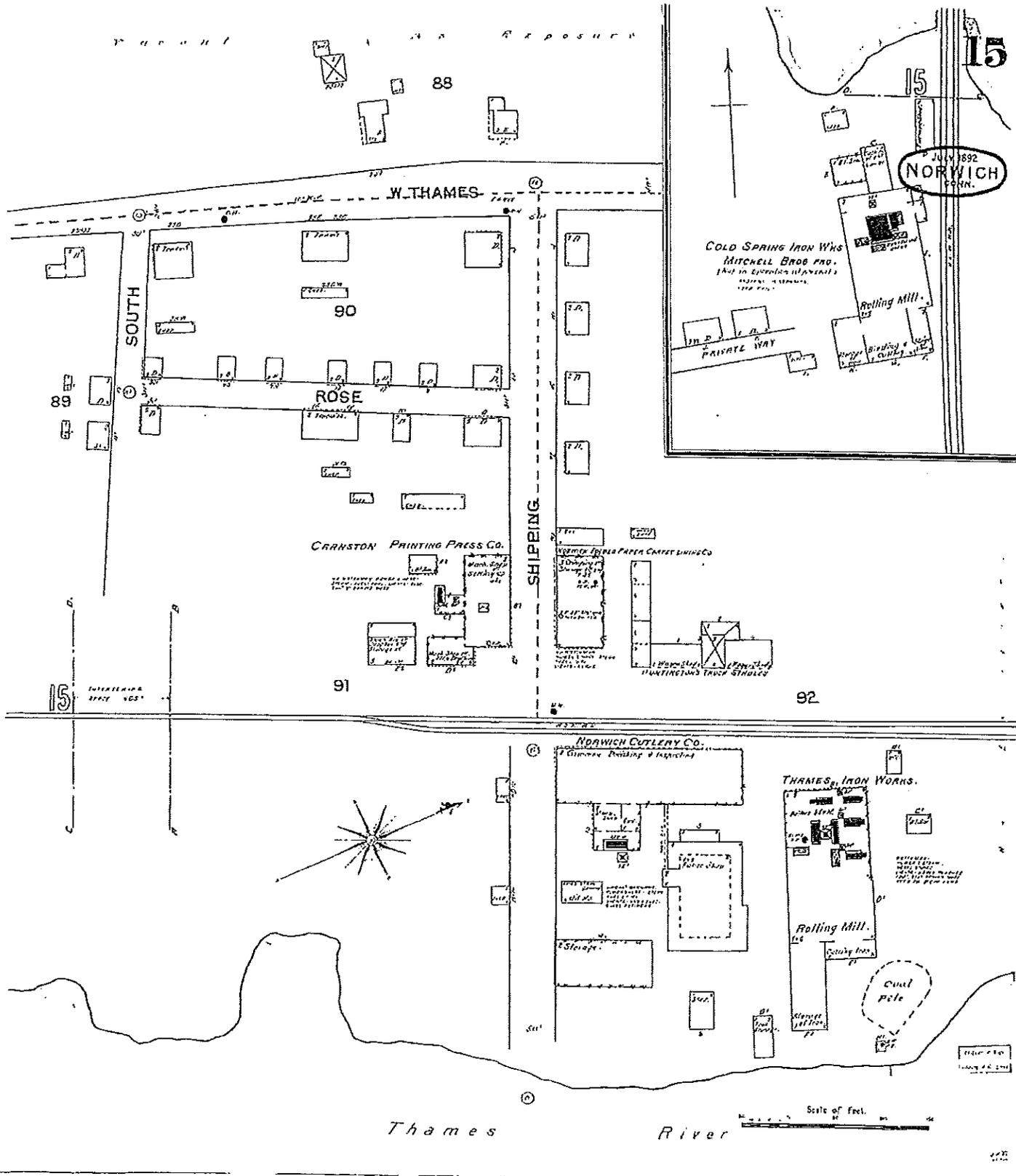
Scale of feet





19
 JUN 1897
 NORWICH
 CORN.
 19

Scale of Feet
 0 10 20 30 40 50 60 70 80 90 100



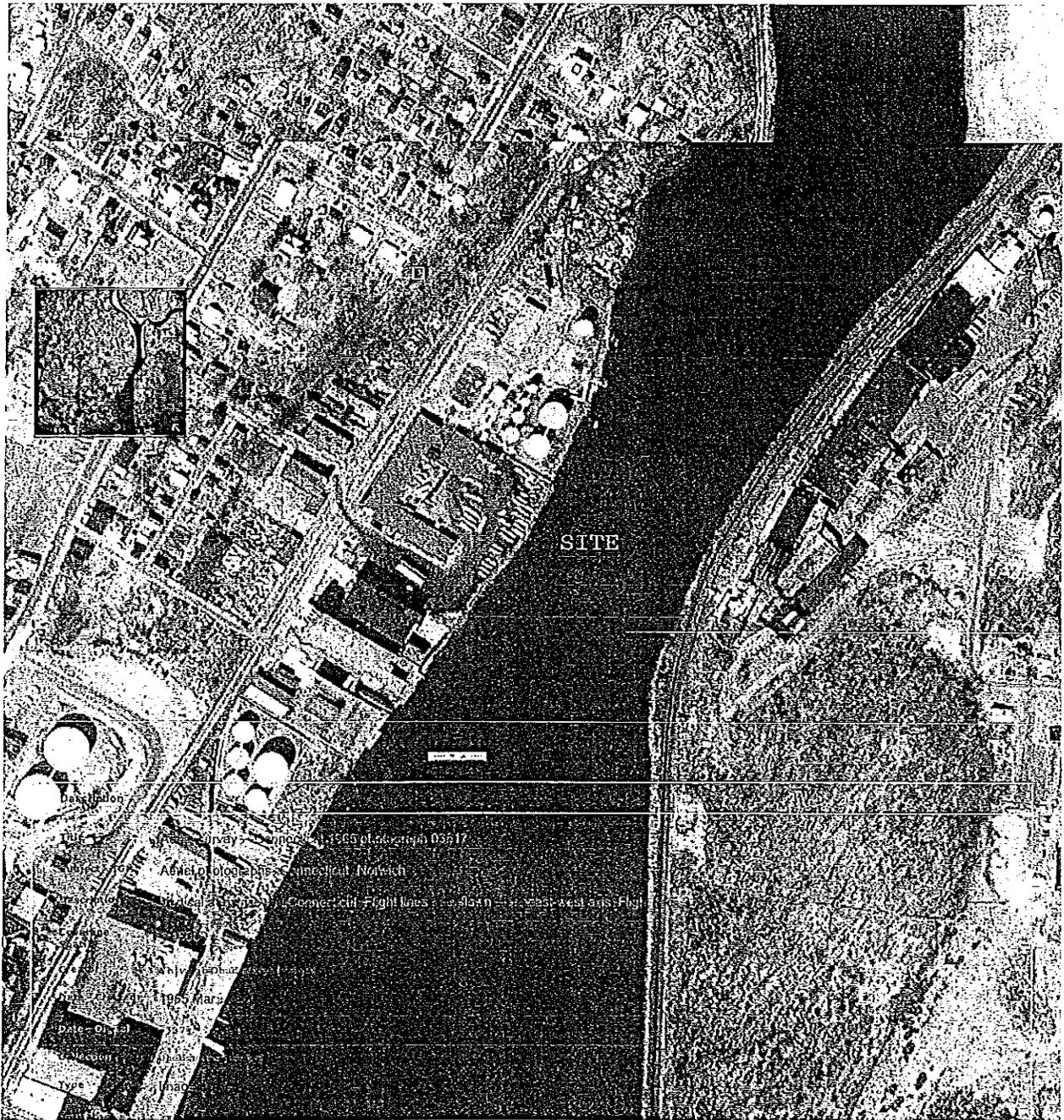

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Title	Aerial survey of Connecticut 1934 photograph 01906
Subject - TGM	Aerial photographs--Connecticut--Norwich
Coverage - Spatial	1:12500
Creator	United States Army Air Corps
Contributors	United States Army Air Corps
Date - Created	1934 / Apr
Date - Digitized	2007
Collection	Aerial Photographs of Connecticut
Image	jpg

Format	jpeg
Source - Location	9 x 7 in., b&w photograph--Connecticut State Library--State Archives--RG 089--41a
Relation	http://www.cslib.org/aerials/
Town(s) Covered	Norwich
X Coord	-72.0783
Y Coord	41.5084
Publisher	United States Army Air Corps
Rights	This work is in the public domain in the United States of America. It is also in the public domain in many other countries. For more information, see http://www.cslib.org/repro.htm
Master File Format	jpeg
File Name	CT1934_01906.jp2



Language eng

Source - Original Photograph/negative/h&w,9 x 9 in

Source - Location Connecticut State Library,State Archives,RG 079-4

Relation <http://www.cslib.org/aerials/>

Town(s) Covered Norwich

X Coord -72.0880

Y Coord 41.5123

Publisher [unreadable]

Rights <http://www.cslib.org/repropub.htm>

Master File Format jpg

PHASE I ENVIRONMENTAL SITE ASSESSMENT
ONE TERMINAL WAY
NORWICH, CONNECTICUT

Appendix D

Regulatory Record Search Information

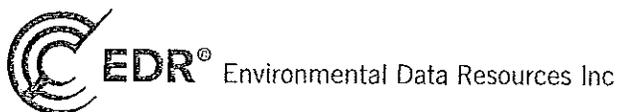
PHASE I ENVIRONMENTAL SITE ASSESSMENT
ONE TERMINAL WAY
NORWICH, CONNECTICUT

EDR Report

1 Terminal Way
1 Terminal Way
Norwich, CT 06360

Inquiry Number: 3510381.1s
February 04, 2013

The EDR Radius Map™ Report



440 Wheelers Farms Road
Milford, CT 06461
Toll Free: 800.352.0050
www.edrnet.com

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Overview Map.....	2
Detail Map.....	3
Map Findings Summary.....	4
Map Findings.....	7
Orphan Summary.....	138
Government Records Searched/Data Currency Tracking.....	GR-1

GEOCHECK ADDENDUM

GeoCheck - Not Requested

Thank you for your business.
Please contact EDR at 1-800-352-0050
with any questions or comments.

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EXECUTIVE SUMMARY

A search of available environmental records was conducted by Environmental Data Resources, Inc (EDR). The report was designed to assist parties seeking to meet the search requirements of EPA's Standards and Practices for All Appropriate Inquiries (40 CFR Part 312), the ASTM Standard Practice for Environmental Site Assessments (E 1527-05) or custom requirements developed for the evaluation of environmental risk associated with a parcel of real estate.

TARGET PROPERTY INFORMATION

ADDRESS

1 TERMINAL WAY
NORWICH, CT 06360

COORDINATES

Latitude (North): 41.5102000 - 41° 30' 36.72"
Longitude (West): 72.0816000 - 72° 4' 53.76"
Universal Transverse Mercator: Zone 18
UTM X (Meters): 743559.1
UTM Y (Meters): 4599297.0
Elevation: 0 ft. above sea level

USGS TOPOGRAPHIC MAP ASSOCIATED WITH TARGET PROPERTY

Target Property Map: 41072-E1 NORWICH, CT
Most Recent Revision: 1983

South Map: 41072-D1 UNCASVILLE, CT
Most Recent Revision: 1984

AERIAL PHOTOGRAPHY IN THIS REPORT

Photo Year: 2010
Source: USDA

TARGET PROPERTY SEARCH RESULTS

The target property was identified in the following records. For more information on this property see page 7 of the attached EDR Radius Map report:

<u>Site</u>	<u>Database(s)</u>	<u>EPA ID</u>
LEHIGH OIL CO LIMITED PARTNERSHIP 1 TERMINAL WAY NORWICH, CT 06360	UST	N/A
1 TERMINAL WAY 1 TERMINAL WAY NORWICH, CT	SPILLS	N/A
LEHIGH OIL 1 TERMINAL WAY NORWICH, CT 06340	MANIFEST	N/A

EXECUTIVE SUMMARY

LEHIGH OIL CO. 1 TERMINAL WAY NORWICH, CT 06360	LUST SPILLS	N/A
LEHIGH OIL 1 TERMINAL WAY NORWICH, CT 06360	FINDS	N/A
LEHIGH OIL CO. 1 TERMINAL WAY NORWICH, CT 06360	SDADB CPCS	N/A

DATABASES WITH NO MAPPED SITES

No mapped sites were found in EDR's search of available ("reasonably ascertainable ") government records either on the target property or within the search radius around the target property for the following databases:

STANDARD ENVIRONMENTAL RECORDS

Federal NPL site list

NPL..... National Priority List
Proposed NPL..... Proposed National Priority List Sites
NPL LIENS..... Federal Superfund Liens

Federal Delisted NPL site list

Delisted NPL..... National Priority List Deletions

Federal CERCLIS list

CERCLIS..... Comprehensive Environmental Response, Compensation, and Liability Information System
FEDERAL FACILITY..... Federal Facility Site Information listing

Federal CERCLIS NFRAP site List

CERC-NFRAP..... CERCLIS No Further Remedial Action Planned

Federal RCRA CORRACTS facilities list

CORRACTS..... Corrective Action Report

Federal RCRA non-CORRACTS TSD facilities list

RCRA-TSDF..... RCRA - Treatment, Storage and Disposal

Federal RCRA generators list

RCRA-LQG..... RCRA - Large Quantity Generators

EXECUTIVE SUMMARY

RCRA-SQG..... RCRA - Small Quantity Generators
RCRA-CESQG..... RCRA - Conditionally Exempt Small Quantity Generator

Federal institutional controls / engineering controls registries

US ENG CONTROLS..... Engineering Controls Sites List
US INST CONTROL..... Sites with Institutional Controls
LUCIS..... Land Use Control Information System

State- and tribal - equivalent CERCLIS

SHWS..... Inventory of Hazardous Disposal Sites

State and tribal landfill and/or solid waste disposal site lists

SWF/LF..... List of Landfills/Transfer Stations

State and tribal leaking storage tank lists

INDIAN LUST..... Leaking Underground Storage Tanks on Indian Land

State and tribal registered storage tank lists

AST..... Marine Terminals and Tank Information
INDIAN UST..... Underground Storage Tanks on Indian Land
FEMA UST..... Underground Storage Tank Listing

State and tribal institutional control / engineering control registries

ENG CONTROLS..... Engineering Controls Listing
AUL..... ELUR Sites

State and tribal voluntary cleanup sites

INDIAN VCP..... Voluntary Cleanup Priority Listing

State and tribal Brownfields sites

BROWNFIELDS..... Brownfields Inventory

ADDITIONAL ENVIRONMENTAL RECORDS

Local Lists of Landfill / Solid Waste Disposal Sites

DEBRIS REGION 9..... Torres Martinez Reservation Illegal Dump Site Locations
ODI..... Open Dump Inventory
SWRCY..... Recycling Facilities

Local Lists of Hazardous waste / Contaminated Sites

US CDL..... Clandestine Drug Labs
CDL..... Clandestine Drug Lab Listing
US HIST CDL..... National Clandestine Laboratory Register

Local Land Records

LIENS 2..... CERCLA Lien Information

EXECUTIVE SUMMARY

LIENS..... Environmental Liens Listing
CT PROPERTY..... Property Transfer Filings

Records of Emergency Release Reports

HMIRS..... Hazardous Materials Information Reporting System

Other Ascertainable Records

DOT OPS..... Incident and Accident Data
DOD..... Department of Defense Sites
FUDS..... Formerly Used Defense Sites
CONSENT..... Superfund (CERCLA) Consent Decrees
ROD..... Records Of Decision
UMTRA..... Uranium Mill Tailings Sites
US MINES..... Mines Master Index File
TRIS..... Toxic Chemical Release Inventory System
TSCA..... Toxic Substances Control Act
FTTS..... FIFRA/ TSCA Tracking System - FIFRA (Federal Insecticide, Fungicide, & Rodenticide Act)/TSCA (Toxic Substances Control Act)
HIST FTTS..... FIFRA/TSCA Tracking System Administrative Case Listing
SSTS..... Section 7 Tracking Systems
ICIS..... Integrated Compliance Information System
PADS..... PCB Activity Database System
MLTS..... Material Licensing Tracking System
RADINFO..... Radiation Information Database
RAATS..... RCRA Administrative Action Tracking System
RMP..... Risk Management Plans
DRYCLEANERS..... Drycleaner Facilities
NPDES..... Wastewater Permit Listing
INDIAN RESERV..... Indian Reservations
SCRD DRYCLEANERS..... State Coalition for Remediation of Drycleaners Listing
PRP..... Potentially Responsible Parties
2020 COR ACTION..... 2020 Corrective Action Program List
EPA WATCH LIST..... EPA WATCH LIST
US FIN ASSUR..... Financial Assurance Information
PCB TRANSFORMER..... PCB Transformer Registration Database
COAL ASH DOE..... Steam-Electric Plant Operation Data
COAL ASH EPA..... Coal Combustion Residues Surface Impoundments List
Financial Assurance..... Financial Assurance Information Listing

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR MGP..... EDR Proprietary Manufactured Gas Plants
EDR US Hist Cleaners..... EDR Exclusive Historic Dry Cleaners

SURROUNDING SITES: SEARCH RESULTS

Surrounding sites were identified in the following databases.

Elevations have been determined from the USGS Digital Elevation Model and should be evaluated on a relative (not an absolute) basis. Relative elevation information between sites of close proximity should be field verified. Sites with an elevation equal to or higher than the target property have been differentiated below from sites with an elevation lower than the target property. Page numbers and map identification numbers refer to the EDR Radius Map report where detailed data on individual sites can be reviewed.

Sites listed in *bold italics* are in multiple databases.

Unmappable (orphan) sites are not considered in the foregoing analysis.

EXECUTIVE SUMMARY

STANDARD ENVIRONMENTAL RECORDS

Federal ERNS list

ERNS: The Emergency Response Notification System records and stores information on reported releases of oil and hazardous substances. The source of this database is the U.S. EPA.

A review of the ERNS list, as provided by EDR, and dated 04/02/2012 has revealed that there are 3 ERNS sites within approximately 0.125 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
Not reported	SHIPPING STREET @ TERMI	W 0 - 1/8 (0.050 mi.)	B7	19
Not reported	SHIPPING STREET @ TERMI	W 0 - 1/8 (0.050 mi.)	B8	19
Not reported	27 TERMINAL WAY	W 0 - 1/8 (0.059 mi.)	B11	25

State- and tribal - equivalent CERCLIS

SDADB: Site Discovery and Assessment Database.

A review of the SDADB list, as provided by EDR, and dated 04/23/2010 has revealed that there are 2 SDADB sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
THAMES/LAUREL HILL LTD PTNRSHIP FALVEY MOTORS	ONE THERMOS AVENUE 395 W THAMES ST	ESE 1/4 - 1/2 (0.318 mi.) SW 1/4 - 1/2 (0.451 mi.)	G49 54	104 122

State and tribal leaking storage tank lists

LUST: The Leaking Underground Storage Tank Incident Reports contain an inventory of reported leaking underground storage tank incidents. The data come from the Department of Environmental Protection's Leaking Underground Storage Tank List.

A review of the LUST list, as provided by EDR, and dated 11/05/2012 has revealed that there are 7 LUST sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
CITY OF NORWICH	24 SHIPPING STREET	WNW 0 - 1/8 (0.101 mi.)	C24	59
CUMBERLAND FARMS #0690	412 LAUREL HILL AVENUE	ESE 1/4 - 1/2 (0.325 mi.)	G50	106
Not reported	431 LAUREL HILL RD	SE 1/4 - 1/2 (0.362 mi.)	51	110
Not reported	495 LAUREL HILL RD	SE 1/4 - 1/2 (0.404 mi.)	52	113
Not reported	296 LAUREL HILL AVENUE	ENE 1/4 - 1/2 (0.413 mi.)	53	118
UNCAS HEALTH CENTER THAMES RIV	401 WEST THAMES ST	SW 1/4 - 1/2 (0.481 mi.)	55	126
DAHL OIL CO.	WEST THAMES ST.	NNE 1/4 - 1/2 (0.486 mi.)	56	134

EXECUTIVE SUMMARY

State and tribal registered storage tank lists

UST: The Underground Storage Tank database contains registered USTs. USTs are regulated under Subtitle I of the Resource Conservation and Recovery Act (RCRA). The data come from the Department of Environmental Protection's "Town Inventory" UST Listing.

A review of the UST list, as provided by EDR, and dated 01/15/2013 has revealed that there are 2 UST sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
26 SHIPPING STREET	26 SHIPPING ST	WNW 0 - 1/8 (0.099 mi.)	C20	44
ANTONINO PONTIAC-BUICK	251 W THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D32	70

State and tribal voluntary cleanup sites

VCP: Sites involved in the Voluntary Remediation Program.

A review of the VCP list, as provided by EDR, and dated 11/27/2012 has revealed that there is 1 VCP site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
UNITED METALS	26 SHIPPING STREET	WNW 0 - 1/8 (0.099 mi.)	C21	44

ADDITIONAL ENVIRONMENTAL RECORDS

Local Brownfield lists

US BROWNFIELDS: The EPA's listing of Brownfields properties from the Cleanups in My Community program, which provides information on Brownfields properties for which information is reported back to EPA, as well as areas served by Brownfields grant programs.

A review of the US BROWNFIELDS list, as provided by EDR, and dated 12/10/2012 has revealed that there is 1 US BROWNFIELDS site within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
UNITED METALS	26 SHIPPING STREET	WNW 0 - 1/8 (0.099 mi.)	C23	57

Records of Emergency Release Reports

SPILLS: The Oil & Chemical Spill Database from the Department of Environmental Protection

A review of the SPILLS list, as provided by EDR, and dated 11/05/2012 has revealed that there are 2 SPILLS sites within approximately 0.125 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
Not reported	27 TERMINAL WAY	W 0 - 1/8 (0.059 mi.)	B10	20
Not reported	13 SHIPPING ST	WNW 0 - 1/8 (0.116 mi.)	C28	67

EXECUTIVE SUMMARY

Other Ascertainable Records

RCRA NonGen / NLR: RCRAInfo is EPA's comprehensive information system, providing access to data supporting the Resource Conservation and Recovery Act (RCRA) of 1976 and the Hazardous and Solid Waste Amendments (HSWA) of 1984. The database includes selective information on sites which generate, transport, store, treat and/or dispose of hazardous waste as defined by the Resource Conservation and Recovery Act (RCRA). Non-Generators do not presently generate hazardous waste.

A review of the RCRA NonGen / NLR list, as provided by EDR, and dated 09/11/2012 has revealed that there are 3 RCRA NonGen / NLR sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
UNITED METAL OF CT	26 SHIPPING ST	WNW 0 - 1/8 (0.099 mi.)	C22	47
ANTONINO PONTIAC-BUICK	251 WEST THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D41	91
SOUTH EAST IND INC	320 W THAMES ST	WSW 1/8 - 1/4 (0.231 mi.)	E44	95

FINDS: The Facility Index System contains both facility information and "pointers" to other sources of information that contain more detail. These include: RCRIS; Permit Compliance System (PCS); Aerometric Information Retrieval System (AIRS); FATES (FIFRA [Federal Insecticide Fungicide Rodenticide Act] and TSCA Enforcement System, FTTS [FIFRA/TSCA Tracking System]; CERCLIS; DOCKET (Enforcement Docket used to manage and track information on civil judicial enforcement cases for all environmental statutes); Federal Underground Injection Control (FURS); Federal Reporting Data System (FRDS); Surface Impoundments (SIA); TSCA Chemicals in Commerce Information System (CICS); PADS; RCRA-J (medical waste transporters/disposers); TRIS; and TSCA. The source of this database is the U.S. EPA/NTIS.

A review of the FINDS list, as provided by EDR, and dated 10/23/2011 has revealed that there are 3 FINDS sites within approximately 0.125 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
26 SHIPPING STREET	26 SHIPPING ST	WNW 0 - 1/8 (0.099 mi.)	C15	32
DESIO INC	18-26 SHIPPING ST	WNW 0 - 1/8 (0.099 mi.)	C18	40
DESIO INC. D/B/A/ UNITED METAL	18-26 SHIPPING ST	WNW 0 - 1/8 (0.105 mi.)	C26	63

LWDS: The Leachate and Waste Water Discharge Inventory Data Layer (LWDS) includes point locations digitized from Leachate and Wastewater Discharge Source maps compiled by the Connecticut DEP.

A review of the LWDS list, as provided by EDR, and dated 07/17/2009 has revealed that there are 2 LWDS sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
NORWICH COMBINED SEWER OVERFLO	SHIPPING STREET	S 0 - 1/8 (0.072 mi.)	12	25
DAHL OIL	ROUTE 32	WSW 0 - 1/8 (0.091 mi.)	13	25

MANIFEST: Facility and manifest data. Manifest is a document that lists and tracks hazardous waste from the generator through transporters to a tsd facility.

A review of the MANIFEST list, as provided by EDR, and dated 11/19/2012 has revealed that there are 21 MANIFEST sites within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
DANIEL MELCHMEN	21 TERMINAL WAY	W 0 - 1/8 (0.056 mi.)	B9	19

EXECUTIVE SUMMARY

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
<i>Not reported</i>	27 TERMINAL WAY	W 0 - 1/8 (0.059 mi.)	B10	20
UNITED METAL OF CONNECTICUT	26 SHIPPING ST	WNW 0 - 1/8 (0.099 mi.)	C16	33
DESIO INC DBA UNITED METAL OF	26 SHIPPING ST	WNW 0 - 1/8 (0.099 mi.)	C17	34
NORWICH CITY OF	26 SHIPPING STREET	WNW 0 - 1/8 (0.099 mi.)	C19	42
UNITED METALS	26 SHIPPING STREET	WNW 0 - 1/8 (0.099 mi.)	C21	44
DESIO INC	18-26 SHIPPING STREET	WNW 0 - 1/8 (0.105 mi.)	C25	62
DESIO INC DBA UNITED METAL OF	18-26 SHIPPING ST	WNW 0 - 1/8 (0.105 mi.)	C27	64
SAWYER DISPLAY	1 SHIPPING STREET	WNW 1/8 - 1/4 (0.146 mi.)	D29	68
ANTONIO BUICK-DATSUN-OPEL INC	251 WEST THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D30	69
HARBORSIDE BUICK NISSAN	251 W THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D33	71
ANTONIO BUICK - NISSAN, INC.	251 WEST THAMES STREET	WNW 1/8 - 1/4 (0.148 mi.)	D34	73
ANTONIO BUICK DATSUN	251 W THAMES ST (RTE 32	WNW 1/8 - 1/4 (0.148 mi.)	D35	75
ANTONIO BUICK DATSUN OPEL INC	251 WEST THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D36	76
ANTONIO BUICK NISSAN, INC.	251 WEST THAMES STREET	WNW 1/8 - 1/4 (0.148 mi.)	D37	79
ANTONIO BUICK - NISSAN, INC.	251 W THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D38	80
ANTONIO BUICK - NISSAN, INC.	251 W THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D39	85
ANTONIO BUICK - NISSAN INC	251 WEST THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D40	90
SOUTH EAST INDUSTRIES INC	320 WEST THAMES ST	WSW 1/8 - 1/4 (0.231 mi.)	E43	94
INTERGRATED CHARTER SCHOOL	68 THERMOS AVENUE	E 1/8 - 1/4 (0.232 mi.)	F46	99
HOUSEHOLD INTERNATIONAL INC	68 THERMOS AVE	E 1/8 - 1/4 (0.232 mi.)	F47	100

AIRS: A listing of permitted air sources in Connecticut.

A review of the AIRS list, as provided by EDR, and dated 05/15/2012 has revealed that there is 1 AIRS site within approximately 0.125 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
UNITED METAL OF CT	26 SHIPPING ST	WNW 0 - 1/8 (0.099 mi.)	C22	47

US AIRS: The database is a sub-system of Aerometric Information Retrieval System (AIRS). AFS contains compliance data on air pollution point sources regulated by the U.S. EPA and/or state and local air regulatory agencies. This information comes from source reports by various stationary sources of air pollution, such as electric power plants, steel mills, factories, and universities, and provides information about the air pollutants they produce. Action, air program, air program pollutant, and general level plant data. It is used to track emissions and compliance data from industrial plants.

A review of the US AIRS list, as provided by EDR, and dated 01/18/2012 has revealed that there is 1 US AIRS site within approximately 0.125 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
DESIO INC	18-26 SHIPPING ST	WNW 0 - 1/8 (0.099 mi.)	C18	40

CPCS: A list of Contaminated or Potentially Contaminated Sites within Connecticut. This list represents the "Hazardous Waste Facilities," as defined in Section 22a-134f of the Connecticut General Statutes (CGS). The list contains the following types of sites: Sites listed on the Inventory of Hazardous Waste Disposal Sites; Sites subject to the Property Transfer Act; Sites at which underground storage tanks are known to have leaked; Sites at which hazardous waste subject to the RCRA; Sites that are included in EPA's (CERCLIS); Sites that are the subject of an order issued by the Commissioner of DEP that requires

EXECUTIVE SUMMARY

investigation and remediation of a potential or known source of pollution; and Sites that have entered into one of the Department's Voluntary Remediation Programs.

A review of the CPCS list, as provided by EDR, and dated 06/04/2012 has revealed that there are 4 CPCS sites within approximately 0.5 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
ANTONINO PONTIAC-BUICK AKA HAR THAMES/LAUREL HILL LTD PTNRSHP	251 WEST THAMES STREET ONE THERMOS AVENUE	WNW 1/8 - 1/4 (0.148 mi.) ESE 1/4 - 1/2 (0.318 mi.)	D42 G49	94 104
UNCAS HEALTH CENTER THAMES RIV DAHL OIL CO.	401 WEST THAMES ST WEST THAMES ST.	SW 1/4 - 1/2 (0.481 mi.) NNE 1/4 - 1/2 (0.486 mi.)	55 56	126 134

EDR HIGH RISK HISTORICAL RECORDS

EDR Exclusive Records

EDR US Hist Auto Stat: EDR has searched selected national collections of business directories and has collected listings of potential gas station/filling station/service station sites that were available to EDR researchers. EDR's review was limited to those categories of sources that might, in EDR's opinion, include gas station/filling station/service station establishments. The categories reviewed included, but were not limited to gas, gas station, gasoline station, filling station, auto, automobile repair, auto service station, service station, etc. This database falls within a category of information EDR classifies as "High Risk Historical Records", or HRHR. EDR's HRHR effort presents unique and sometimes proprietary data about past sites and operations that typically create environmental concerns, but may not show up in current government records searches.

A review of the EDR US Hist Auto Stat list, as provided by EDR, has revealed that there is 1 EDR US Hist Auto Stat site within approximately 0.25 miles of the target property.

<u>Equal/Higher Elevation</u>	<u>Address</u>	<u>Direction / Distance</u>	<u>Map ID</u>	<u>Page</u>
Not reported	251 W THAMES ST	WNW 1/8 - 1/4 (0.148 mi.)	D31	70

EXECUTIVE SUMMARY

Due to poor or inadequate address information, the following sites were not mapped. Count: 20 records.

<u>Site Name</u>	<u>Database(s)</u>
LEHIGH OIL CO	FINDS,AIRS (AFS)
CONNECTICUT DOT	LUST,CPCS
GOODWILL/EASTER SEALS	LUST,CPCS
ROTO-PRINT SITE	VCP,CPCS,HWS,SDADB
NORWICH IRON & METAL CO.	HWS,SDADB,CPCS
STATE PRO. 103-255, RT 82	NPDES
PYTKO CONSTRUCTION CORP	AIRS
NORWICH IRON & METAL CO., INC.	FTTS,FINDS,HIST FTTS
DMH-NORWICH HOSPITAL	MANIFEST
NORWICH HOSPITAL	MANIFEST
STATE OF CONN. D.O.T.	MANIFEST
K & L TRUCK SEVICE	MANIFEST
MAC'S GARAGE, INC.	MANIFEST
	LF
GENERAL DYNAMICS CORPORATION ELECT	FINDS,RCRA-NLR
UNCAS-ON-THAMES HOSPITAL	MLTS
SILVER, JULES	PROPERTY
UNCAS ON THAMES HOSPITAL	SDADB
DAHL OIL	SDADB
SILVER, JULES	SDADB

