

# ENVIRONMENTAL ASSESSMENT

**CITY OF HARTFORD**  
**OFFICE OF CENTRAL GRANTS, DEPARTMENT OF MANAGEMENT AND BUDGET**  
**2021-2022**



**CITY OF HARTFORD**  
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**2021-2022**

**PROJECT NAME:** Pliny Street Supportive Housing

**PROJECT LOCATION:** 102 Pliny Street  
Hartford, CT

**PROJECT SPONSOR:** My Sister's Place

**PROJECT CONTACT:** Ben Bare, Hartford Housing Authority – (860) 723-8508

**ESTIMATED TOTAL PROJECT COST:** Construction Funding sources are estimated to be the following:

CHFA	\$4,500,000
CT DOH Flex	\$3,012,434
Low Income Housing Tax Credit	\$ 277,494
Housing TC Contribution	<u>\$ 365,261</u>
Total	\$8,155,189

Permanent Funding\* sources are estimate to be the following:

CT DOH Flex	\$3,500,000
National Housing Trust Fund	\$1,319,756
Low Income Housing Tax credit	\$3,920,604
Energy Rebates	\$ 43,596
Housing TC Contribution	<u>\$ 365,261</u>
Total	\$9,149,217

\* HUD – Section 8 rent subsidies for 19 project units and State RAP rent subsidies for 5 project units

**RESPONSIBLE ENTITY:** City of Hartford  
Management and Budget Department, Office of Central Grants Admn  
550 Main Street, Room 302, Hartford, CT 06103

**CERTIFYING OFFICER:** Lionel Rigler, Environmental Review Project Manager (860) 757-9277

**CONDITIONS FOR APPROVAL:**

List all mitigation measures adopted by the responsible entity to eliminate or minimize adverse environmental impacts. These conditions must be included in project contracts or other relevant documents as requirements. [24 CFR 58.40(d), 40 CFR 1505.2(c)]

**ENVIRONMENTAL FINDING:** [58.40(g)]

- ☐ Categorical exclusion is made in accordance with § 50.20.
- ☒ Environmental Assessment and a Finding of No Significant Impact (FONSI) is made in accordance with § 50.33.
- ☐ Environmental Assessment and a Finding of Significant Impact is made, and an Environmental Impact Statement is required in accordance with §§ 50.33(d) and 50.41.

**THIS ENVIRONMENTAL ASSESSMENT WAS PREPARED BY:**

**Name:** Lionel Rigler

**Title:** Environmental Review Project Manager  
City of Hartford  
Management and Budget Department  
Office of Central Grants Administration

**Signature:** Lionel Rigler

**Date:** March 16, 2022

## CITY OF HARTFORD

### OFFICE OF CENTRAL GRANTS, DEPARTMENT OF MANAGEMENT AND BUDGET

2021-2022

#### APPROVED BY:

**Name:** Sheryl Horowitz

**Signature:** \_\_\_\_\_

**Title:** Acting Director, Office of Central Grants Administration

**Date:** 3/17/22

## PART ONE: PROJECT DESCRIPTION AND ACTIVITIES

### STATEMENT OF PURPOSE AND NEED FOR THE PROPOSAL: [40 CFR 1508.9(b)]

To rehabilitate a blighted and underdeveloped property in Hartford's Upper Albany neighborhood.

### DESCRIPTION OF THE PROPOSAL: INCLUDE ALL CONTEMPLATED ACTIONS THAT ARE EITHER GEOGRAPHICALLY OR FUNCTIONALLY A COMPOSITE PART OF THE PROJECT, REGARDLESS OF THE SOURCE OF FUNDING. [24 CFR 58.32, 40 CFR 1508.25]

My Sister's Place (MSP) seeks to rehabilitate a building that they own in the North End of Hartford, at 102 Pliny Street. The project is called Pliny Street Supportive Housing. Currently vacant, the property had been used for transitional housing for the homeless until that program ended in 2018. MSP is now securing construction and permanent funding to provide 24 units of permanent supportive housing at the 24,770 square foot, 2-story structure. MSP has secured 24 rent subsidies (from the Hartford Housing Authority and Shelter Plus Care), and related support services to provide assistance to all residents of the building. There are seven (7) 1-BR units, eleven (11) 2-BR units and six (6) 3-BR units.

Funding is coming from the proceeds of Low-Income Housing and Solar Tax Credits, Tax Exempt bonding from CHFA, State bond funding from DOH, Housing Tax Credit Contribution Program and DOH National Housing Trust Fund. The project has been secured by all agencies and a closing on all funding is expected in April of 2022.

Construction is anticipated to commence in July, 2022 with a construction duration of approximately 12 months.

### EXISTING CONDITIONS AND TRENDS: DESCRIBE THE EXISTING CONDITIONS OF THE PROJECT AREA AND ITS SURROUNDINGS, AND TRENDS LIKELY TO CONTINUE IN THE ABSENCE OF THE PROJECT. [24 CFR 58.40(a)]

In the absence of this project, the existing parcel would likely remain blighted and under-developed for some time.

**PART TWO: ENVIRONMENTAL REVIEW****A) STATUTORY CHECKLIST**

Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
<b>Historic Properties</b> [36 CFR 800]	✓						<p>The State Historic Preservation Office has reviewed the information submitted for the above-named property pursuant to the provisions of Section 106 of the National Historic Preservation Act of 1966 and Connecticut Environmental Policy Act.</p> <p>The property located at 102 Pliny Street, known as My Sister's Place, does not appear eligible for listing on the National Register of Historic Places. Based on the information provided, no historic properties will be affected.</p> <p>(Jonathan Kinney, State Historic Preservation Officer) Dec 21, 2021</p>
Floodplain Management [24CFR55, EO 11988]	✓						<p>Project site is not located within the 100- or 500-year flood zone and does not require flood insurance. (indicated on Property Detail Map included in Environmental Review Record)</p>
Wetlands Protection [EO 11990]	✓						<p>Project not in wetland areas defined by City 1987 Designated Inlands, Wetlands, and Watercourses Map. (included in Environmental Review Record)</p>
Coastal Zone Management [Sec. 307(c), (d)]	✓						<p>Hartford is not located in a coastal zone. CT Map. (included in Environmental Review Record)</p>
Water Quality– Aquifers [40 CFR 149]	✓						<p>Hartford is not located on a sole source aquifer. State of CT Aquifer Map. (included in Environmental Review Record)</p>
Endangered Species [50 CFR 402]	✓						<p>None in area, per Natural Diversity Database Digital Data. (indicated on Property Detail Map included in Environmental Review Record)</p>
Wild & Scenic Rivers [Sections 7 (b), (c)]	✓						<p>There are no designated wild and scenic rivers within the City of Hartford. (HUD Tidbits of the Environment #06-017 dated 10/6/05)</p>



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Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
							For each listed statute, executive order or regulation, record the determinations made. Note reviews and consultations completed as well as any applicable permits or approvals obtained. Attach evidence that all required actions have been taken. Categorically Excluded Activities: Determine whether projects are: exempt, need mitigation, need an environmental assessment (EA).
Air Quality [Clean Air Act, Sections 176 (c) and (d), and 40 CFR 6, 51, 93]	✓						No industrial operation or power station is located in the project area. The project will also not create a large number of dwelling units that might generate a high volume of vehicular traffic i.e. 1,000 or more vehicles. <i>(<a href="http://www.hud.gov/offices/cpd/energyenviron/environment/compliance/forms/trngmanual/chapt2compliance.cfm">http://www.hud.gov/offices/cpd/energyenviron/environment/compliance/forms/trngmanual/chapt2compliance.cfm</a>)</i>
Farmlands Protection [7 CFR 658]	✓						Project is on previously developed land, and will have no impact on prime or unique farmland or other farmland of state or local importance. <i>(indicated on Property Detail Map included in Environmental Review Record)</i>
Manmade Hazards Thermal/Explosive [24 CFR 51 C]	✓						Project is an Acceptable Safe Distance from thermal/explosive hazards nor project will expose neither people nor buildings to such hazards. <i>Eagle Environmental, Inc. 8 South Main Street, Suite 3, Terryville, CT 06786, Nov 2021. Phase I Environmental Site Assessment</i>
Noise [24 CFR 51 B]	✓						The noise to be generated by construction equipment between 7AM-6PM on weekdays and Saturdays is considered exempt from ordinance. <i>(Hartford Municipal Code, Ch. 23, Noise, Sec. 23-3(e))</i> The project site is also fully surrounded by existing urban and commercial uses. <i>(area knowledge)</i>
Airport Clear Zones [24 CFR 51 D]	✓						There are no commercial service airports in the area as designated by National Plan of Integrated Airport Systems, prepared by the FAA. <i>(revised HUD Tidbit #06-021 dated 7/21/06)</i>

Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
<b>Toxic Sites</b> [24 CFR 58.5(i)(2)]	✓						<p>The Site is located within approximately 0.5 miles of six (6) air pollution sources, one (1) brownfield site, no Superfund sites, no toxic substance release, and no water pollution discharge sources. No hazardous waste TSDF facilities are located within 0.5 mile of the Site. The project will involve rehabilitation of an existing building and is not anticipated to result in any significant adverse environmental impacts.</p> <p>A Pre-Renovation Hazardous Building Materials Inspection Report was performed by Eagle Environmental Inc, November 8, 2021, see Asbestos and Lead issues below.</p>
Environmental Justice [EO 12898]	✓						The rehabilitation and improvements to twenty-four (24) apartments does not have the potential for new or continued disproportionately high and adverse human health and environmental effects on minority or low-income populations, and is not likely to raise environmental justice issues.
Flood Insurance - 58.6(a)	✓						Project site is not located within the 100 or 500-year flood zone and does not require flood insurance. (See Property Detail Map included in Environmental Review Record)
Coastal Barriers - 58.6(b)	✓						Hartford is not located in a coastal zone. (CT map included in Environmental Review Record)
Airport Clear Zone Notification - 58.6(c)	✓						Project is not located within 2500 feet of runway of a designated FAA facility. (revised HUD Tidbit #06-021, dated 7/21/06)
Water Quality	✓						Groundwater is classified as GB. Class GB groundwater is designated for industrial process water and cooling waters and baseflow for hydraulically-connected water bodies and is presumed not suitable for human consumption without treatment. The project site is served by municipal water and served through the Metropolitan District Commission. Eagle Environmental, Inc. 8 South Main Street, Suite 3, Terryville, CT 06786, Nov 2021. Phase I Environmental Site Assessment Section 4.3 included in Environmental Review Record)
Solid Waste Disposal	✓						<p>The City of Hartford Department of Public Works handles solid waste disposal. Demolition debris must follow disposal pursuant to State and Local guidelines.</p> <p>(<a href="http://www.hartford.gov/Public_Works/Waste_&amp;_Recycling">www.hartford.gov/Public_Works/Waste_&amp;_Recycling</a>)</p>

Area of Statutory or Regulatory Compliance	Not Applicable to This Project	Consultation Required*	Review Required*	Permits Required*	Determination of consistency Approvals, Permits obtained*	Conditions and/or Mitigation Actions Required	Provide compliance documentation. Additional material may be attached.
Fish and Wildlife	✓						Project site occupies land already developed for residential purposes. No endangered species in area, as per Natural Diversity Database Digital Data. (indicated on Property Detail Map included in Environmental Review Record)
Building permits				✓			<b>Must be obtained prior to start of work.</b> ( <a href="http://www.Hartford.gov/Development/lic-inspect/lic-build-permitapp.htm">http://www.Hartford.gov/Development/lic-inspect/lic-build-permitapp.htm</a> )
Asbestos Abatement						✓	<p>During the course of the building inspection one hundred twenty-two (122) bulk samples of suspect ACM were collected and one hundred twenty-one (121) samples were analyzed by PLM based on the "stop on first positive" request to the laboratory. From the one hundred twenty-two (121) samples analyzed, the building materials listed below were found to be ACM: Window glazing compound at stored windows – black</p> <p>The stored windows with asbestos-containing window glazing compound are stacked together in a single location within the basement of the building and appear to be remnants of the previous renovation. The asbestos-containing window glazing compound was not identified on any of the currently installed replacement windows on the building.</p> <p>In addition, the following materials were assumed to be ACM: roof drain insulation, pipe valve packings and Boiler interior refractory materials.</p> <p>All regulated friable and regulated non-friable ACM must be removed prior to renovation activities if the materials will be impacted by renovation work. (Eagle Environmental, Inc., Pre-Renovation Hazardous Building Materials Inspection Report, 102 Pliny Street, Nov 8, 2021)</p> <p>If encountered during project activities, the contractor is responsible to handle and dispose of asbestos according to State and Federal laws, and to notify the Div. of Grants Management of any change in the project scope. <a href="http://www.dph.state.ct.us/BRS/asbestos/40CFR763WHOLE.pdf">http://www.dph.state.ct.us/BRS/asbestos/40CFR763WHOLE.pdf</a></p>

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<b>LBP Abatement</b>						✓	<p>A total of one hundred eighty (180) X-Ray Fluorescence Screen readings, including instrument calibration readings, were collected during the lead-based paint screen performed in limited areas of the building. From the one hundred eighty (180) readings, none of the tested components and surfaces were found to contain high levels of lead. <i>(Eagle Environmental, Inc., Pre-Renovation Hazardous Building Materials Inspection Report, 102 Pliny Street, Nov 8, 2021)</i></p> <p>If encountered during project activities, the contractor is responsible to handle and dispose of lead-based paint according to State and Federal laws, and to notify the Division of Grants Management of any change in the project scope. <a href="http://www.dph.state.ct.us/BRS/Lead/RegsandStatutes/lead_regulations.htm">www.dph.state.ct.us/BRS/Lead/RegsandStatutes/lead_regulations.htm</a></p>
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**B) ENVIRONMENTAL ASSESSMENT**

[Environmental Review Guide HUD CPD 782, 24 CFR 58.40; Ref. 40 CFR 1508.8 & 1508.27] Evaluate the significance of the effects of the proposal on the character, features and resources of the project area. Enter relevant base data and verifiable source documentation to support the finding. Then enter the appropriate impact code from the following list to make a determination of impact. Note names, dates of contact, telephone numbers and page references. Attach additional material as appropriate. Note conditions or mitigation measures required.

Impact Codes: (3) - Potentially adverse; (1) - No impact anticipated; (4) - Requires mitigation; (2) - Potentially beneficial; (5) - Requires project modification		
LAND DEVELOPMENT	CODE	SOURCE OR DOCUMENTATION
<b>Conformance with Comprehensive Plans and Zoning</b>	2	<u>Planning and Zoning Review</u> – The project is awaiting administrative approval for the City of Hartford Planning Staff. The Planning and Zoning Commission approval is not needed for a rehab of an existing building with no additions to the building.
<b>Compatibility and Urban Impact</b>	2	The project is awaiting administrative approval for the City of Hartford Planning Staff. The Planning and Zoning Commission approval is not needed for a rehab of an existing building with no additions to the building.
<b>Slope</b>	1	No comment on the slope
<b>Erosion</b>	1	Construction activities shall be consistent with the Connecticut General Permit for the Discharge of Stormwater and Dewater Wastewater Associated with Construction Activities and will implement appropriate erosion and sediment controls. ( <a href="http://www.cicacenter.org/pdf/ctpermit.pdf">www.cicacenter.org/pdf/ctpermit.pdf</a> )
<b>Soil Suitability</b>	1	Nothing significant about the soil suitability was noted in the Preliminary Environmental Report.

Impact Codes: (1) - No impact anticipated; (2) - Potentially beneficial;			(3) - Potentially adverse; (4) - Requires mitigation; (5) - Requires project modification
<b>Hazards and Nuisances including Site Safety</b>	3	<b>Potential Asbestos Abatement</b>  During the course of the building inspection one hundred twenty-two (122) bulk samples of suspect ACM were collected and one hundred twenty-one (121) samples were analyzed by PLM based on the "stop on first positive" request to the laboratory. From the one hundred twenty-two (121) samples analyzed, the building materials listed below were found to be ACM: Window glazing compound at stored windows – black  The stored windows with asbestos-containing window glazing compound are stacked together in a single location within the basement of the building and appear to be remnants of the previous renovation. The asbestos-containing window glazing compound was not identified on any of the currently installed replacement windows on the building.  In addition, the following materials were assumed to be ACM: roof drain insulation, pipe valve packings and Boiler interior refractory materials.  All regulated friable and regulated non-friable ACM must be removed prior to renovation activities if the materials will be impacted by renovation work. ( <i>Eagle Environmental, Inc., Pre-Renovation Hazardous Building Materials Inspection Report, 102 Pliny Street, Nov 8, 2021</i> )  If encountered during project activities, the contractor is responsible to handle and dispose of asbestos according to State and Federal laws, and to notify the Div. of Grants Management of any change in the project scope. <a href="http://www.dph.state.ct.us/BRS/asbestos/40CFR763WHOLE.pdf">http://www.dph.state.ct.us/BRS/asbestos/40CFR763WHOLE.pdf</a>	
<b>Energy Consumption</b>	1	The project must meet, at a minimum, City of Hartford and State of Connecticut basic building codes, any existing rehabilitation standards, zoning ordinances, HUD Housing Quality Standards, and the Model Energy Code. ( <a href="http://www.hartford.gov/housing/programs/HOME-program/home-program07-10-04.htm">www.hartford.gov/housing/programs/HOME-program/home-program07-10-04.htm</a> ; <a href="http://www.Hartford.gov/Development/planning/Docs/regs_zoning.pdf">www.Hartford.gov/Development/planning/Docs/regs_zoning.pdf</a> ).	
<b>Noise-Contribution to Community Noise Levels</b>	1	The noise to be generated by construction equipment between 7AM-6PM on weekdays and Saturdays is considered exempt from ordinance ( <i>Hartford Municipal Code, Chapter 23, Noise, Section 23-3(e)</i> ). The project site is also fully surrounded by existing urban and commercial uses, and when occupied is anticipated to have no impact on community noise levels.	
<b>Air Quality-Effects of Ambient Air Quality on Project and Contribution to Community Pollution Levels</b>	1	There are no nearby sources for localized pollution (industry, dump, power stations) and the project consisting of rehabilitation in a historic mixed-use building will not contribute significantly to the extent of existing pollution (smog, dust, odors, smoke) in the existing residential and commercial district.	
<b>Environmental Design Visual Quality-Coherence, Diversity, Compatible Use and Scale</b>	1	The State Historic Preservation Office has reviewed the information submitted for the above-named property pursuant to the provisions of Section 106 of the National Historic Preservation Act of 1966 and Connecticut Environmental Policy Act.  The property located at 102 Pliny Street, known as My Sister's Place, does not appear eligible for listing on the National Register of Historic Places. Based on the information provided, no historic properties will be affected.  (Jonathan Kinney, State Historic Preservation Officer) Dec 21, 2021	

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<b>Demographic Character Changes</b>	2	The properties are zoned NX-2, this proposal complies with standard.
<b>Displacement</b>	1	There will be no displacement, as the project will be on currently undeveloped property.
<b>SOCIOECONOMIC</b>	<b>CODE</b>	<b>SOURCE OR DOCUMENTATION</b>
<b>Employment and Income Patterns</b>	2	The project will most likely support the local construction industry on a short term basis. The project site is located in Census Tract 5018; its population contains <b>69.2%</b> low- and moderate- income families. <i>(2015-2020 ACS Census)</i>
<b>Educational Facilities</b>	1	The addition of twenty-four apartments is not anticipated to impact the demand for educational services.
<b>Commercial Facilities</b>	1	In the mile surrounding the project site, there are several commercial entities such as banks, salons, medical offices, markets, pharmacies and eateries.
<b>COMMUNITY FACILITIES AND SERVICES</b>	<b>CODE</b>	<b>SOURCE OR DOCUMENTATION</b>
<b>Health Care</b>	1	Based on the project description of the rehabilitation of 24 apartments, no adverse impact is anticipated to the demand on health services. St. Francis Hospital is a full-service health care facilities located within 1 mile of the project site.
<b>COMMUNITY FACILITIES AND SERVICES</b>	<b>CODE</b>	<b>SOURCE OR DOCUMENTATION</b>
<b>Social Services</b>	1	Based on the project description of production of 24 apartment units, no adverse impact is anticipated to the demand on social services. In addition to services offered by the City's Health and Human Services Department, there are several and varied social service providers within close proximity of the project site.
<b>Solid Waste</b>	1	Site is included in the City's weekly Dept. of Public Works pickup schedule. <i>(www.hartford.gov/Public_Works/Waste_&amp;_Recycling/cllctnad406.pdf)</i> Regulations are detailed in the City's Waste and Recycling Guidelines, Rules, and Regulations 2006 Edition. <i>(hartford.gov/Public_Works/Guide/guidelines.pdf)</i>
<b>Waste Water</b>	1	The City's wastewater is handled by the Metropolitan District Commission sewage plant service. <i>(http://www.themdc.com)</i>
<b>Storm Water</b>	1	Based on the site's urban setting, stormwater likely discharges to the municipal storm sewers. The project developer will ensure that facilities shall be connected to MDC storm water disposal service as other facilities in the area. Storm water is channeled to MDC storm drains, either through direct rain leaders or appropriate site grading. <i>(http://www.themdc.com)</i>
<b>Water Supply</b>	1	The project site is served by municipal water and sewer through the Metropolitan District Commission. <i>(http://www.themdc.com)</i> No change is anticipated as the project site was once occupied by residences.

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<b>Public Safety</b> <b>- Police</b>	1	911 services are available throughout Hartford for public safety emergencies. Hartford Police Department headquarters, located at 253 High Street, is approximately 1.0 miles south of the project site.
<b>- Fire</b>	1	911 service is available throughout Hartford for fire emergencies and the Fire Department is the first responder for medical emergencies. District 1, located at 275 Pearl Street, is approximately 1.5 miles from the project site.
<b>- Emergency Medical</b>	1	911 service is available throughout Hartford for fire emergencies and the Fire Department is the first responder for medical emergencies. District 1, located at 275 Pearl Street, is approximately 1.5 miles from the project site.
<b>Open Space and Recreation</b> <b>-Open Space</b>	1	Keney Park, located less than 1 mile from the project site, features areas for baseball, soccer, picnic areas, playgrounds, recreation center and outdoor swimming pool.
<b>-Recreation</b>	1	Keney Park, located less than 1 mile from the project site, features areas for baseball, basketball, soccer, picnic areas, playgrounds, recreation center and outdoor swimming pools.
<b>COMMUNITY FACILITIES AND SERVICES</b>	<b>CODE</b>	<b>SOURCE OR DOCUMENTATION</b>
<b>-Cultural Facilities</b>	1	Project site is in walking distance/local bus to a variety of cultural facilities such as Mark Twain House; Real Art Ways; Wadsworth Atheneum; Hartford Stage Company; XL Center; Theatreworks, Hartford Public Library; Bushnell Auditorium; and many worship centers. <i>(area knowledge/field observation)</i>
<b>Transportation</b>	1	The project is unlikely to result in significantly more traffic than currently exists or historically existed in the project area. The site is served by Connecticut Transit's 50-54, 56, 58, 901, 902 and 46 bus routes on Albany Avenue. <i>(cttransit.com)</i> The Amtrak train and multi-carrier bus station are located approximately 1.7 mile from the project site. <i>(MapQuest)</i>
<b>NATURAL FEATURES</b>	<b>CODE</b>	<b>SOURCE OR DOCUMENTATION</b>
<b>Water Resources</b>	1	Construction activities shall be consistent with the CT General Permit for the Discharge of Stormwater and Dewater Wastewater Associated with Construction Activities and will implement appropriate erosion and sediment controls <i>(www.cicacenter.org/pdf/ctpermit.pdf)</i> .
<b>Surface Water</b>	1	The nearest watercourse to the site is the Park River approximately 2,700 feet west of the subject site. The classification is C/B, which represents a surface water body that is not currently meeting one or more class B water criteria as a result of one or more sources of pollution. <i>(Phase I, Section 2.2.1)</i>
<b>Unique Natural Features and Agricultural Lands</b>	1	Project site not located in areas of farmland or other such importance. <i>(indicated on Property Neighborhood Map included in Environmental Review Record)</i>



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<b>Vegetation and Wildlife</b>	1	Project site is currently developed as urban land, and is not in the vicinity of any endangered species. <i>(indicated on Property Detail Map included in Environmental Review Record)</i>
<b>OTHER FACTORS</b>	<b>CODE</b>	<b>SOURCE OR DOCUMENTATION</b>
<b>Flood Disaster Protection Act [Flood Insurance] [§58.6(a)]</b>	1	Project site is not located on the 100- or 500- year flood zone, and does not require flood insurance. <i>(indicated on Property Detail Map included in Environmental Review Record)</i>
<b>Coastal Barrier Resources Act- Coastal Barrier Improvement Act [§58.6(c)]</b>	1	Hartford is not a coastal city. <i>(Connecticut map, included in Environmental Review Record)</i>
<b>Airport Runway Clear Zone or Clear Zone Disclosure [§58.6(d)]</b>	1	Project is not located within 2500 feet of runway of a designated FAA facility. <i>(revised HUD Tidbit #06-021 dated 7/21/06).</i>

### PART III: SUMMARY OF FINDINGS AND CONCLUSIONS

#### Alternatives to the Proposed Actions

No significant and unavoidable adverse impacts were identified for the proposed project. Therefore, project alternatives or modifications have not been considered.

#### No Action Alternative [24 CFR 58.40(e)]

The No Action Alternative: This alternative considers the impact of no change at the site; the lots at the project site would remain as a blighted property, which would continue to negatively impact aesthetics, socioeconomic conditions, and public health and safety as compared to the proposed project.

The No Action alternative would result in the loss of 24 apartments.

#### Attached Studies or Summaries

- 1) Phase I Environmental Site Assessment for My Sister's Place, 102 Pliny Street, Hartford, CT; Eagle Environmental, Inc., November 12, 2021.
- 2) Pre-Renovation Hazardous Building Materials Inspection Report, Eagle Environmental, Inc., 102 Pliny Street, Nov 8, 2021.
- 3) SHPO letter – December 21, 2021

#### List of Sources, Agencies and Persons Consulted [40 CFR 1508.9(b)]

- 1) City of Hartford Planning and Zoning Regulations  
([http://www.hartford.gov/images/Planning/POSTING\\_Hartford\\_Zoning\\_Final\\_2016.01.22\\_SECURE.pdf](http://www.hartford.gov/images/Planning/POSTING_Hartford_Zoning_Final_2016.01.22_SECURE.pdf))
- 2) City of Hartford 2016-2020 Consolidated Plan  
(<http://www.hartford.gov/images/Grants/WEB-FINAL%20CONPLAN%20062514.pdf>)
- 3) CT Transit Bus Schedule ([www.cttransit.com](http://www.cttransit.com))
- 4) United States EPA Website ([www.epa.gov](http://www.epa.gov))
- 5) City of Hartford Website ([www.hartford.gov](http://www.hartford.gov))
- 6) Hartford Public Schools Website ([www.hartfordschools.org](http://www.hartfordschools.org))
- 7) Metropolitan District Commission Website ([www.themdc.com](http://www.themdc.com))
- 8) Google Maps
- 9) ESRI/ArcMap

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10) Centers for Disease Control/NIOSH Website ([www.cdc.gov/niosh/](http://www.cdc.gov/niosh/))

11) CT Dept. of Environmental Protection ([www.ct.gov/dep/](http://www.ct.gov/dep/))

12) Riverfront Recapture website ([www.riverfront.org](http://www.riverfront.org))

13) Area Knowledge/Field Observation by Environmental Review Officer

#### **Additional Notes:**

This Environmental Assessment was prepared based on the Phase I Environmental Site Assessment and all related documents submitted to the Department of Development Services Housing and Property Division.

**My Sister's Place** shall provide the Department of Development Services Department, Division of Housing and Property and the Department of Management and Budget, Office of Central Grants with documentation of the remedial action taken, contaminants found in the process, and any additional information that may change the scope of the work recommended on the aforementioned environmental report(s).

**My Sister's Place** shall be aware that this environmental assessment is subject to revision, should conditions change.



Department of Economic and  
Community Development

State Historic Preservation Office

December 21, 2021

Mr. Daniel Gurvich  
Chief Financial Officer  
Community Housing Advocates, Inc.  
221 Main Street, 4th Floor  
Hartford, CT 06106

Subject: My Sisters' Place  
102 Pliny Street  
Hartford, CT  
ENV-22-0454

Dear Mr. Gurvich:

The State Historic Preservation Office has reviewed the information submitted for the above-named property pursuant to the provisions of the Connecticut Environmental Policy Act.

The property located at 102 Pliny Street, known as the My Sisters' Place, does not appear eligible for listing on the National Register of Historic Places. Based on the information provided, no historic properties will be affected.

The State Historic Preservation Office appreciates the opportunity to review and comment upon this project. These comments are provided in accordance with the Connecticut Environmental Policy Act. For further information please contact Marena Wisniewski, Environmental Reviewer, at (860) 500-2357 or [marena.wisniewski@ct.gov](mailto:marena.wisniewski@ct.gov).

Sincerely,

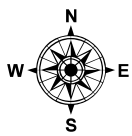
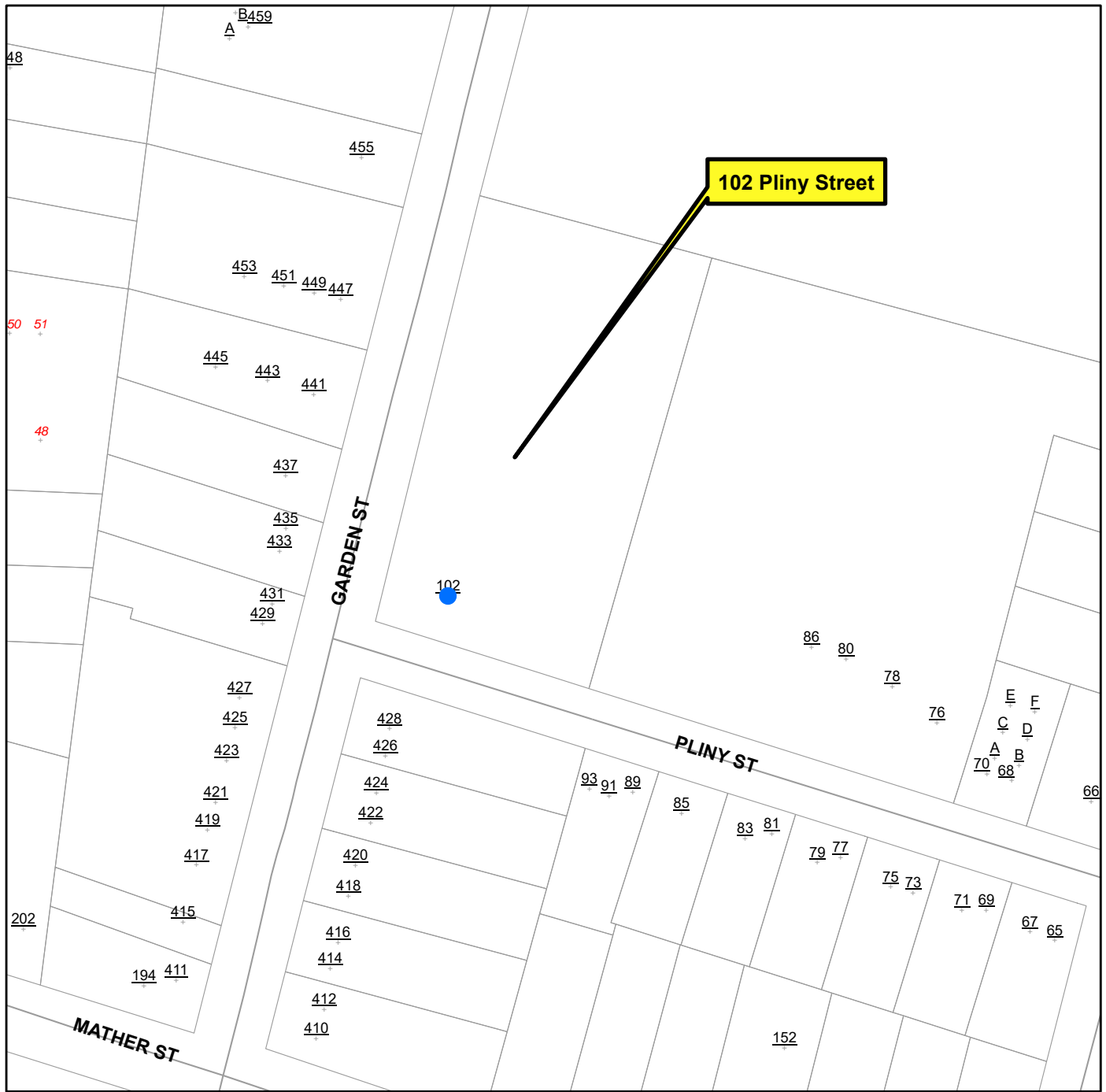
A handwritten signature in dark ink, reading "Jonathan Kinney".

Jonathan Kinney  
State Historic Preservation Officer

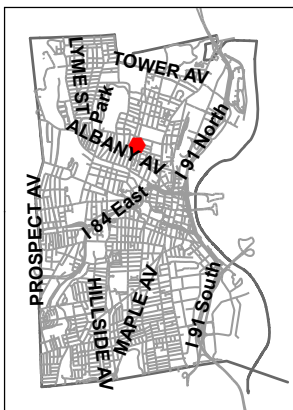
State Historic Preservation Office

450 Columbus Boulevard, Suite 5 | Hartford, CT 06103 | P: 860.500.2300 | [ct.gov/historic-preservation](http://ct.gov/historic-preservation)

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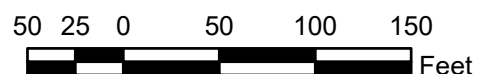


## Property Detail Map 102 Pliny Street Hartford, CT



### Legend

- 100 Year Flood Zone
- 500 Year Flood Zone
- Property Line
- Hydric Soils
- NDDDB Endangered Species
- Swamp



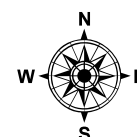


## 102 PLINY STREET, HARTFORD, CT

### Property Details

Located in Historic District: No

Name of Historic District: N/A



### Legend

- Subject Property
- Local Historic District
- State Historic District
- National Historic Districts

0 100 200  
Feet



PHASE I ENVIRONMENTAL SITE ASSESSMENT REPORT  
MY SISTER'S PLACE  
102 PLINY STREET  
HARTFORD, CONNECTICUT

FOR

MR. DANIEL GURVICH  
CHIEF FINANCIAL OFFICER  
COMMUNITY HOUSING AUTHORITY, INC.  
221 MAIN STREET, 4<sup>TH</sup> FLOOR  
HARTFORD, CONNECTICUT 06106

NOVEMBER 2021





November 12, 2021

Mr. Daniel Gurvich  
Chief Financial Officer  
Community Housing Authority, Inc.  
221 Main Street, 4<sup>th</sup> Floor  
Hartford, Connecticut 06106

**RE: Phase I Environmental Site Assessment  
My Sister's Place  
102 Pliny Street, Hartford, Connecticut  
Eagle Project No. 21-175.10T2**

Dear Mr. Gurvich:

Eagle Environmental, Inc. (Eagle) completed a Phase I Environmental Site Assessment for the My Sister's Place, Inc. property located at 102 Pliny Street in Hartford, Connecticut (the "Site"). The Phase I Environmental Site Assessment was performed in general accordance with American Testing and Materials (ASTM) Standard E1527-13 and meets EPA's All Appropriate Inquiry (AAI) standard.

Based on the completed Phase I Site Assessment, Eagle has identified no Recognized Environmental Conditions (RECs) in connection with the Site. One historical REC (HREC) was identified, related to petroleum-impacted soil that was successfully remediated in the late 1980's, but the DEEP indicated in June 1989 that all appropriate remedial actions had been taken with respect to that release, and no further action is deemed necessary.

Details of the investigation activities and findings are provided in the enclosed report. Thank you for the opportunity to assist you with this project. Please contact us directly if you have any questions related to the report.

Sincerely,  
**Eagle Environmental, Inc.**

Report Prepared By:  
Emily-Anne Deutsch  
Environmental Consultant I

Report Reviewed By:  
Robert R. Kovach, II, LEP, CPG  
Senior Manager, Environmental Sciences

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Appendix A Site History Documentation  
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## EXECUTIVE SUMMARY

Eagle Environmental, Inc. (Eagle) performed a Phase I Environmental Site Assessment (ESA) on the My Sister's Place, Inc. property located at 102 Pliny Street in Hartford, Connecticut (the Site). This Phase I ESA was performed in accordance with the scope and limitations of American Society for Testing and Materials (ASTM) standards E1527-13 and meets EPA's All Appropriate Inquiry (AAI) standard. The Phase I ESA included an environmental databases search, review of local, state, and federal regulatory agency files, and a limited reconnaissance of the Site and vicinity for potential off-site contamination sources. No sampling or other intrusive activities were conducted as part of the Phase I ESA. Additionally, an evaluation of building materials for the presence of suspected asbestos-containing material (ACM), lead-based paint (LBP), and poly-chlorinated biphenyls (PCBs) and an evaluation for the presence of radon gas were not included in the scope of work for the Phase I ESA.

The major findings of the Phase I ESA are as follows:

- The Site consists of one parcel of land with an area of approximately 1.12 acres. The Site contains one two-story building, as well as associated landscaped areas and paved parking areas.
- The current Site building was built in 1910. The Site is currently owned by My Sister's Place, Inc. Industrial activities were conducted at the Site prior to 1983. The Site operated as a multi-family apartment building from 1989 until circa 2017, but is currently vacant.
- The Site building has a partial basement with an associated boiler room. The Site building utilizes natural gas heat. The Site has historically been connected to public water and sewer service, but these utility services are currently inactive. No chemical storage was observed in the Site building at the time of the Phase I site inspection.
- No aboveground or underground storage tanks were observed on Site.
- One pad-mounted electrical transformer was observed on the Site. No staining or other evidence of a dielectric fluid release was observed during the Phase I site inspection.
- Several nearby properties with listed hazardous waste generation and/or underground storage tank activity were identified. Based on distance from the Site and/or remediation documentation, potential releases on these properties would not be expected to have adversely impacted the Site.

Based on the completed Phase I Site Assessment, no Recognized Environmental Conditions (RECs) have been identified in connection with the Site.

One Historical REC (HREC) was identified with respect to the Site during the current investigation:

HREC No.1 – Petroleum-Impacted Soil: Previous environmental investigation reports indicate that petroleum-impacted soil was reported to have been encountered beneath a portion of the Site building's basement during environmental investigations in the late 1980's. An unspecified quantity of contaminated soil from this area was reportedly excavated and disposed off-site, and the reports indicate that DEP (now DEEP) issued a concurrence in June 1989 to the environmental consultant's determination that all necessary remedial action had been completed. Given the prior DEEP determination, no further action is deemed necessary regarding this issue.

## 1.0 INTRODUCTION

Eagle Environmental, Inc. (Eagle) performed a Phase I Environmental Site Assessment (ESA) for the My Sister's Place, Inc. property located at 102 Pliny Street in Hartford, Connecticut (the "Site"). My Sister's Place, Inc. currently owns the Site.

The purpose of the Phase I ESA is to determine if Recognized Environmental Conditions (RECs)<sup>1</sup> are present in connection with the Site from past or present property usage in accordance with the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) of 1980 (as amended, 40 USC 9601, et seq.). Furthermore, the Phase I ESA will assess applicable levels of environmental compliance; environmental liability; hazardous material stored, released or disposed of on Site; and the need for characterization investigation, if required.

This Phase I ESA was conducted in conformance with the scope and limitations of American Society for Testing and Materials (ASTM) Standard Practice E1527-13 for the Phase I Environmental Site Assessment Process (ASTM E1527-13) which is compliant with EPA's All Appropriate Inquiry (AAI) rule (40 CFR §312).

### 1.1 Purpose

The purpose of the Phase I ESA was to:

- Identify RECs, defined by ASTM as a condition with the potential for a past, current, or future release of oil or hazardous materials (OHM) at the Property.
- Identify historic RECs (HRECs); defined by ASTM as a past release of OHM that has achieved regulatory closure without required controls or conditions.
- Identify controlled RECs (CRECs); defined by ASTM as a past release of OHM that has achieved regulatory closure with required controls or conditions.
- Evaluate the potential for a release of OHM at the Property.

In addition, this Phase I ESA considers whether the Site may be an "Establishment" as defined under the Connecticut Transfer Act (Sections 22a-134 through 22a -134e of the Connecticut General Statutes), as amended.

### 1.2 Scope

The standard Phase I ESA scope of work includes the following tasks:

- Review of an environmental database search report for sites identified on various Federal and State regulatory databases including: National Priorities List (NPL); Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS); Resource Conservation and Recovery Act (RCRA); emergency response notification sites; State spills; underground storage tanks; leaking underground storage tanks; etc.;
- Review of files and database listings at the Connecticut Department of Energy and Environmental Protection (DEEP) environmental file room in Hartford, Connecticut;
- Review of municipal files at the Tax Assessor's Office, Health Department, Fire Marshal's Office, and Building Department;

---

<sup>1</sup>Recognized environmental conditions-the presence or likely presence of any *hazardous substances or petroleum* products in, on or at a *property*: (1) due to release to the environment; s92) under conditions indicative of a *release* to the *environment*; or (3) under conditions that pose a *material threat* of a future *release* to the *environment*. *De minimis* conditions are not *recognized environmental conditions*

- Site reconnaissance to observe readily apparent current conditions and uses;
- A reconnaissance of surrounding properties to identify potential off-site sources of contamination; and,
- Vapor encroachment screening based on information obtained via the environmental database report, local and/or state research and interview documentation.

Due to temporary access restrictions in place as a result of the ongoing COVID-19 pandemic, certain municipal and State records were not practically reviewable within the timeframe of this report, as discussed in Sections 5.1 and 5.2. In accordance with the approved scope of work, The Phase I ESA does not include collection of samples for suspect asbestos containing material (ACM), lead-based paint (LBP), or radon gas. A Hazardous Building Materials Inspection (HBMI) for the Site is being performed for the project as a separate task.

### **1.3 Significant Assumptions**

Our opinion and conclusions are based on the information sources presented in this report, and a site reconnaissance of the Property. Eagle assumes that all available information obtained as part of this ESA including database records, interview information, and historic information is accurate and reliable.

### **1.4 Limitations and Exceptions**

This report meets the general requirements for a Phase I ESA established by ASTM Standard Practice E1527-13. Eagle's Phase I ESA is subject to the following limitations:

The opinions provided herein are based on the information described in this report. Future investigations or information that was not available to Eagle may result in modification of the findings of this report. In preparing this report, Eagle relied on file information provided by state and local officials and information and representations made available to Eagle at the time of the report. If such information is incomplete or inaccurate, Eagle is not responsible. Eagle's professional services for this project have been performed in a manner consistent with that degree of skill and care ordinarily exercised by members of our profession currently practicing in the same locality, performing similar services under similar conditions. Eagle makes no other representations and no warranties, express or implied.

### **1.5 Special Terms and Conditions**

This Phase I ESA was performed with no Special Terms and Conditions.

### **1.6 User Reliance**

This report was prepared for the use of Community Housing Advocates, Inc.

## **2.0 SITE DESCRIPTION**

### **2.1 Site Ownership and Location**

Site Owner: My Sister's Place, Inc.  
Site Occupant : Vacant – Multifamily Residential  
Site Location: 102 Pliny Street, Hartford, CT 06106  
County: Hartford County  
Parcel ID: 220-225-125  
Latitude (North): 41° 46' 53.52''  
Longitude (West): 72° 41' 02.29''  
Size 1.12 acres  
Elevation: 54 feet above sea level

The 1.12-acre Site is located in Hartford, Connecticut, approximately 50 to 55 feet above sea level. The Site is accessed via Pliny Street and Garden Street. The property contains one two-story apartment building that was utilized as safe, halfway housing and is currently vacant. The location of the Site is depicted on a Locus Map and Topographic Map provided as figures ***SL-1*** and ***SL-2***, respectively.

### **2.2 Current Use of the Property**

The Site was previously utilized as transitional housing and is currently vacant.

### **2.3 Site Reconnaissance**

An Eagle representative performed visual observations of the Site during a Site Reconnaissance on October 13, 2021. The Site was observed by inspecting the property and entering the mechanical and maintenance spaces of the Site building. The purpose of the Site reconnaissance was to observe current Site conditions and assess, based on visual observations, if there were release(s) of OHM to the surface or subsurface. Photographs of the Site are included in ***Exhibit A***.

#### **2.3.1 Water Supply**

The Site building is connected to the public water supply system, but service is currently inactive.

#### **2.3.2 Wastewater Disposal**

The Site is not connected to the municipal sanitary sewer system, but service is currently inactive.

#### **2.3.3 Oil/Chemical Storage**

No raw oil or chemical storage was observed during the Site visit.

##### *2.3.3.1 Stains, Corrosion or Odors*

No staining, corrosion, or odors were observed during the Site visit.

#### *2.3.3.2 Drains, Sumps or Pools of Liquid*

Multiple catch basins were observed in the parking lot. One floor drain was observed in the Boiler Room of the Site building. No sumps or pools of liquid were observed during the Site visit.

### **2.3.4 On-Site Storage Tanks**

#### *2.3.4.1 Underground Tanks*

No underground storage tanks were observed during the Site visit. The Site building's heating system is supplied by natural gas.

#### *2.3.4.2 Aboveground Tanks*

No aboveground storage tanks were observed during the Site visit.

### **2.3.5 Transformers/PCB-Containing Equipment**

One pad-mounted electrical transformer was observed on the Site property. No label was observed indicating the PCB content of the dielectric fluid within the transformer. No staining or other evidence of a dielectric fluid release was observed during the Site inspection.

### **2.3.6 Pits, Ponds, and Lagoons**

No pits, ponds, or lagoons were observed during the Site visit.

### **2.3.7 Stained Soil or Pavement**

Minor stains were observed in the parking lot associated with vehicle parking. No stained soil was observed during the Site visit.

### **2.3.8 Odors and Stressed Vegetation**

No unusual odors or stressed vegetation were observed during the Site visit.

### **2.3.9 Solid Waste**

Two municipal trash receptacles were observed on the Site.

## **2.4 Current Uses of Adjoining Properties**

Eagle conducted an area reconnaissance by walking through the Site and observing the property and adjacent areas on October 13, 2021. Observed land uses in areas surrounding the Site are described below:

<b>Northerly:</b>	Commercial and residential properties, cemetery
<b>Easterly:</b>	Residential properties
<b>Southerly:</b>	Commercial and residential properties
<b>Westerly:</b>	Commercial and residential properties

### **3.0 SITE AND AREA HISTORY**

The Site and area history has been compiled from City Directories, Historical Topographic Maps, Aerial Photographs of the Site and municipal records and interviews.

#### **3.1 Sanborn Fire Insurance Maps**

Certified Sanborn® Fire Insurance Maps were obtained via the EDR Sanborn Fire Insurance Maps Library for the years 1900, 1917, 1920, 1922, 1950, and 1979. The Site is not mapped on the 1900 Sanborn map. The map from 1917 shows the Site occupied by Industrial Title & Guarant Co. The map from 1920 shows the property to be occupied by The Wayleys Bickford. The map from 1922 shows the property being occupied by The Wiley Bickford Sweet Co. and the Manufacturers of Military Equipment & Woolen Slippers. The map from 1950 shows the property being occupied by The Silex Co. Manufacturer Glass Coffee Percolators. The map from 1979 shows the property being occupied by The Silex Co. Copies of the Sanborn Fire Insurance Report are included as *Appendix A*.

#### **3.2 Topographic maps**

Topographic maps were obtained via EDR Topographic Map Library. Specific maps reviewed included the United States Geological Survey (USGS): Hartford 15-minute Quadrangle for 1892, Farmington 30-minute Quadrangle for 1906, Windsor 7.5-minute Quadrangle for 1928, Hartford North 7.5-minute Quadrangle for 1945, 1952, 1964, 1972, 1984, 1992, 1994, and 2012. The Site topography does not appear to have changed significantly since 1892, with higher elevation to the northwest. The Site is located at an elevation between approximately 50 to 55 feet above sea level. Copies of the topographic maps are included in *Appendix A*.

#### **3.3 Aerial Photographs**

Aerial photographs were obtained by Eagle via EDR through their Aerial Photo Decade Package sourced from various state and Federal collections. Aerial photographs reviewed were for the years 1934, 1941, 1943, 1951, 1958, 1962, 1967, 1970, 1972, 1985, 1989, 1992, 1995, 2005, 2008, 2012, and 2016. The aerial photograph from 1934 shows the thinner portion of the Site building to be present, with a connecting passageway to a group of contiguous industrial buildings on the adjacent parcel to the east. A rectangular building is present on the adjacent parcel to the east, extending onto the northeastern corner of the Site, beginning with the 1941 aerial photo, with Site conditions remaining relatively unchanged through the 1951 aerial photo. The connecting passageway leading from the Site building is not present in the 1957 photo, and the current northern, slightly wider portion of the Site building is present beginning with the 1962 aerial photo. Site conditions then are observed to remain relatively unchanged in aerial photos through 1995. The 2005 and 2008 aerial photos show the buildings on the adjacent parcel to the east to have been demolished. The 2012 and 2016 aerial photos show the current configuration of the Site and the adjacent building to the east. Copies of the aerial photographs are included in *Appendix A*.

#### **3.4 City Directories**

City directories from 1920, 1925, 1936, 1941, 1946, 1951, 1956, 1960, 1968, 1986, 1992, 1995, 2000, 2005, 2010, 2014, and 2017 were obtained from the EDR Digital Archive, Johnson's City Directory, and Price & Lee's City Directory and were reviewed by Eagle.

Directory listings from 1960 show Ramondetta Bros Wood Products Inc as the occupant of the property. Directory listings from 1968 show Futuramik Industries Inc as the occupant of the property. Directory listings from 1995, 2000, 2005, 2010, 2014, and 2017 show My Sister's Place Inc. Transitional Housing as the occupant of the property. Directory listings from 1920, 1925, 1936, 1941, 1946, 1951, 1956, 1986, and 1992 do not list the property. Copies of the city directories are included in *Appendix A*.

### **3.5 Site History Summary**

Prior to 1910, the Site was undeveloped land in Hartford. The structure present on the Site today was constructed in 1910. The Site currently houses a vacant two-story apartment building. Site history documentation is provided in ***Appendix A***.



## **4.0 Geology and Hydrology**

### **4.1 Surficial Geology**

According to the DEEP Surficial Materials Map of Connecticut (Stone 1992), the materials beneath the Site are mapped as fines. Fines generally occur at the surface and are composed of well-sorted, thin layers of alternating silt and clay or thicker layers of very fine sand and silt.

### **4.2 Bedrock Geology**

The *1985 Bedrock Geological Map of Connecticut* indicates that the bedrock unit beneath the Site is Portland arkose; a reddish-brown to maroon micaceous arkose and siltstone and red to black fissile silty shale.

### **4.3 DEEP Groundwater Classification and Hydrology**

According to the DEEP Water Quality Classifications Map of Connecticut (2015), the Site has a groundwater classification of GB. Designated uses for Class GB groundwater include industrial process water and cooling waters, and baseflow for hydraulically-connected water bodies. GB groundwater is presumed to not be suitable for human consumption without treatment.

The direction of groundwater flow within the surficial geological unit is influenced by a number of factors, including the physical characteristics of the soil and the local topography, the presence of surface water bodies, the depth to bedrock, and the type of aquifer. For an unconsolidated, unconfined aquifer, groundwater generally flows in the direction of the greatest topographic gradient. Eagle reviewed the area topography as it relates to the Site and determined an inferred direction of groundwater flow through the Site and adjacent area to be southeast, toward the Connecticut River.

### **4.4 DEEP Surface Water Classification**

The nearest USGS-mapped surface water to the site is the Connecticut River, which is located approximately 5,611 feet southeast of the Site. According to the DEEP Water Quality Classifications Map of Connecticut (2015), the DEEP has classified the Connecticut River in the vicinity of the Site as a Class SB surface water. Designated uses for Class SB marine surface waters are as habitat for fish and other aquatic life and wildlife, shellfish harvesting, recreation, and navigation.

## 5.0 REGULATORY REVIEW

### 5.1 Federal and State Environmental Databases

#### 5.1.1 Introduction

Eagle retained Environmental Data Resource, Inc. (EDR) of Milford, Connecticut to perform an on-line radius search (based on AAI standards) of applicable State and Federal environmental databases. The EDR report (see *Appendix B*), dated October 12, 2021, reviewed the following databases for the area within the specified radius of the subject parcel:

Information Source	Search Distance
<b>Federal Files</b>	
National Priorities List (NPL)	1 mile
USEPA NPL Delisted Sites	1 mile
Resource Conservation and Recovery Act (RCRA) CORRACTS list (RCRA Site Subject to Corrective Action)	1 mile
Tribal Lands (boundaries within which recognized tribes have primary governmental authority)	1 mile
Resource Conservation and Recovery Act (RCRA) Treatment, Storage or Disposal Facility (TSDF) List	0.5 mile
Comprehensive Environmental Response Compensation and Liability Information System (CERCLIS) List, including No Further Remedial Action Planned (NFRAP) sites	0.5 mile
Federal Institutional / Engineered Control List	0.5 mile
RCRA Generators List	0.25 mile
Emergency Response and Notification (ERNS) List	property only
<b>State Files</b>	
Hazardous Waste Site List (State sites equivalent to NPL)	1 mile
Hazardous Waste Site List (State sites equivalent to CERCLIS)	0.5 mile
Landfill and Solid Waste Site	0.5 mile
Leaking Underground Storage Tank (LUST) List	0.5 mile
State Voluntary Clean-up or Brownfield Sites	0.5 mile
Oil & Chemical Spills Database	0.5 mile
Registered Underground Storage Tank (UST) List	0.5 mile
State Institutional / Engineered Control List	0.5 mile
State Other (includes CT Property Transfer Program sites)	0.5 mile

Based on the inferred direction of groundwater flow at the Site (southeasterly), properties within the search radii specified above that are located to the northwest and upgradient of the Site were considered as they relate to potential offsite sources of contamination. The location of the Site is depicted on the Topographic Map provided as *Figure SL-2*.

### **5.1.2 Site Regulatory Listings**

The Site is not listed in any of the State or Federal regulatory databases specified in ASTM E1527-13, except the following:

- CT Manifest for 2,800 pounds of D008-Lead being shipped from 76-102 Pliny Street in 2004.
- PA Manifest for 2,000 pounds of D007-Chromium being shipped from 76-102 Pliny Street in 2007.
- CT Manifest for various amounts of D007-Chromium and D008-Lead being shipped from 76-102 Pliny Street in 2007.
- CT NPDES reported a permit for groundwater remediation wastewater to a sanitary sewer in 2008.

Based on information presented in a previous 2017 Phase I ESA for the Site, manifest and permit listings that include the Site address were determined to for waste materials generated during abatement and environmental remediation activities on the adjacent parcel to the east, which had been combined with the Site parcel between the 1930's and the 1980's, and not the Site.

### **5.1.3 Area Regulatory Listings**

Several properties were identified in State and Federal regulatory databases listed above within the specified search radii. Based on distance or direction from the Site, the properties generally not considered to have any significant potential to adversely impact soil or groundwater quality at the Site. The following database listings were evaluated as being of potential interest relative to the Site:

*Blanks CH & Sons Inc, 175 Mather Street, located 0.063 miles south of the Site*

- EDR Hist Auto reports this property as a Toys and Hobby Goods & Supplies store from 1969 to 1972, a Petroleum Products, NEC from 1973 to 1978, and a Fuel Oil Dealer from 1979 to 1980.
- CT Brownfields lists this property as funded by the Brownfield Municipal Grant Program
- US Brownfields lists this property as vacant since 1999, was previously a gas and fuel oil distributor, and stored junk automobiles.

*Hartford Housing Authority, 73 Vine Street, located 0.209 miles west of the Site*

- CT Spills reported the removal of two 2,000 gallon No.2 fuel oil LUSTs in 1998, status listed as CLOSED. In 2011, less than one gallon of transformer oil spilled to the ground surface. The spill was reportedly cleaned, and the status is listed as CLOSED.

*City of Hartford, 100 Vine Street, located 0.210 miles west-northwest of the Site*

- CT LUST reported the removal of a 5,000 gallon No.2 heating oil UST in 1996, and the status is listed as COMPLETED.

*Vine Street School, 104 Vine Street, located 0.213 miles west-northwest of the Site*

- One 5,000 gallon steel heating oil UST (A-1) was permanently closed and removed from the property.

*Exxon Station / R&D Service Center, 550 Albany Avenue, located 0.225 miles south-southwest of the Site*

- CT CPCS reported the removal of a 6,000 gallon LUST and soil, and the status listed as COMPLETED.
- One 6,000 gallon coated and cathodically protected steel (sti-P3) UST (C3) containing gasoline, one 5,000 gallon sti-P3 gasoline UST (C4), one 6,000 gallon steel UST (A1) containing gasoline, and one 4,000 gallon sti-P3 gasoline UST (B2) were permanently closed and removed from the property. One 1,000 gallon fiberglass reinforced plastic (FRP) UST (D5R1) containing used oil is temporarily closed. Three 6,000 gallon FRP gasoline USTs (C3R1, A1R1, and B2R1) and one 550 gallon FRP heating oil UST (E6) are currently listed as being in use.

*Community Health Services, 520 Albany Avenue, located 0.228 miles south-southwest of the Site*

- CT LUST reported the removal of a UST and soil in 1990, status listed as INITIATED.
- CT Spills reported in 1994 an unknown amount of mercury spilled to ground due to damage to a wall mounted unit for blood pressure, status listed as CLOSED.

*Community Health Services, 500 Albany Avenue, located 0.232 miles south-southwest of the Site*

- One 4,000 gallon steel heating oil UST (A1) is currently in use.

*QP Cleaners, 581 Albany Avenue, located 0.232 miles south-southwest of the Site*

- One 1,000 gallon steel heating oil UST (A1) is currently in use.

*Tony's Service, 605 Albany Avenue, located 0.234 miles south-southwest of the Site*

- Two 10,000 gallon steel gasoline USTs (A1 and B2), one 4,000 gallon steel gasoline UST (C3), and one 550 gallon steel gasoline UST (D4) were permanently closed and removed from the property. One 6,000 gallon diesel FRP UST (E5), one 6,000 gallon FRP gasoline UST (F6), and one 8,000 gallon FRP gasoline UST (G7) are listed as currently being in use.

*Howard MC Lendon, 263 Capen, located 0.319 miles north of the Site*

- CT LUST reported in 1998 for the removal of a 550 gallon No.2 fuel oil UST and soil, status listed as COMPLETED.

During the time period of the current investigation, access to the DEEP Records Center was limited, due to emergency personal distancing restrictions associated with the ongoing COVID-19 pandemic, so direct access to DEEP records as a supplement to the State and Federal environmental database review was not possible during the timeframe of this investigation. Eagle obtained additional records via DEEP's Document Online Search Portal, although only limited records are currently available via this method. It was not practical to obtain DEEP records via a freedom of information request during the investigation period, due to current DEEP processing timeframes. Several relevant documents were found pertaining to the Site during that online file review. Any relevant files are provided in **Appendix C**.

## **5.2 Municipal File Review**

During the time period of the current investigation, public access to City of Hartford municipal offices was limited, due to emergency restrictions implemented in association with the ongoing COVID-19 pandemic, so direct access to municipal records was not available. Eagle attempted to obtain municipal records via other available methods such as online portals, telephone interviews, or emailed freedom of information requests, as practically available during the investigation period. Municipal office research performed as part of this Phase I ESA study is summarized in the sections below. Pertinent municipal files are provided in *Appendix C*.

### **5.2.1 Tax Assessor**

Access restrictions to City offices prevented a review of Hartford Tax Assessor files during the period of this investigation. A property information summary was available from the Connecticut Assessor's Online Database.

### **5.2.2 Building Department**

Access restrictions to City offices prevented an in-person review of Hartford Building Department files during the period of this investigation. A Freedom of Information Act Report Request form was submitted to the Hartford Freedom of Information Request Portal on October 12, 2021. There was no response to this request.

### **5.2.3 Fire Marshal's Office**

Access restrictions to City offices prevented an in-person review of Hartford Fire Marshal Office files during the period of this investigation. A Freedom of Information Act Report Request form was submitted to the Hartford Freedom of Information Request Portal on October 12, 2021. There was no response to this request. A letter documenting removal of a 5,000-gallon fuel oil UST from 2007 was found in the Fire Marshal's files during the previous 2017 Phase I ESA, but the letter appears to be associated with the adjacent parcel to the east.

### **5.2.4 Health Department**

Access restrictions to City offices prevented an in-person review of Hartford Health Department files during the period of this investigation. A Freedom of Information Act Report Request form was submitted to the Hartford Freedom of Information Request Portal on October 12, 2021. There was no response to this request.

## **6.0 USER PROVIDED INFORMATION**

A User Questionnaire was completed by Mr. Daniel Gurvich of Community Housing Authority, Inc. A summary of the information provided by Mr. Johnson from the questionnaire is provided below. A copy of the questionnaire is provided in *Appendix D*.

Note that a complete title search, valuation, and other real estate information are beyond the scope of work of this Phase I ESA.

Historical information is provided in *Section 4.0, 5.0 and 6.0* of this report. The information presented in this section was based primarily on the information collected from Mr. Gurvich.

### **6.1 Environmental Liens**

The above-referenced individual indicated in the User Questionnaire that he is unaware of any environmental liens issued against the subject Site.

### **6.2 Environmental Land Use Restrictions**

The above-referenced individual indicated in the User Questionnaire that he is unaware of any environmental land use restrictions that are in place at the Site or that have been recorded in public land records for the Site.

### **6.3 Specialized Knowledge**

The above-referenced individual indicated in the User Questionnaire that he is unaware of specialized knowledge or experience relating to the subject Site that would be relevant to identification of RECs.

### **6.4 Valuation Reduction for Environmental Issues**

The above-referenced individual indicated in the User Questionnaire that he has knowledge of any reduction in the market value of the property due to environmental concerns.

### **6.5 Commonly Known or Reasonable Ascertainable Information**

The above-referenced individual indicated in the User Questionnaire that he is unaware of known or reasonable ascertainable information pertaining to the subject Site that would assist in identification of RECs.

### **6.6 Degree of Obviousness of Contamination**

The above-referenced individual indicated in the User Questionnaire he is unaware of any obvious indicators that point to the presence or likely presence of contamination on the property.

### **6.7 Previous Reports**

The User of this report provided one previous environmental investigation report, a Phase I ESA completed by GeoQuest in 2017, for Eagle to review. A copy of this previous report can be found in *Attachment D*. Pertinent additional findings regarding the Site, based on review of the 2017 Phase I report, are summarized below:

- Until sometime in the 1920's, a small watercourse, Gully Brook, reportedly traversed the northern end of the Site in a west to east direction, then turned southward just to the east of the Site. The brook was then reportedly contained within a conduit in the vicinity of the Site, and no longer appears on mapping after c.1920.

- Several previous environmental investigations were conducted on the Site between 1988 and 2011, some as part of investigations that included the adjacent parcel to the east, based on historical manufacturing activities on these parcels. Although these documents were not provided to Eagle for review, a summary of these investigations was provided by GeoQuest in their 2017 Phase I ESA report. According to GeoQuest, environmental activities on the Site included remediation of a small volume of soil impacted by “oil and grease” in the late 1980’s. Following that activity, subsequent investigations on the Site have reportedly determined that no additional environmental conditions warranting further investigation or remedial action are present at the Site.
- Information obtained from interviews of persons familiar with historical activities at the Site and the adjacent parcel to the east indicate that hazardous waste manifests generated during the 2000’s from the combined “76-102 Pliny Street” address were, in fact, related to building demolition and soil remediation activities on the eastern parcel, not the current Site parcel. Given that the two parcels had presumably been subdivided by that time, the manifests would likely not result in qualification of the Site as an “establishment” under the Connecticut Property Transfer Law.

## **7.0 INTERVIEWS**

### **7.1 User**

The User is typically interviewed about their knowledge of the Site during the Phase I ESA study. The User of the report, Mr. Daniel Gurvich of Community Housing Authority, Inc., referred Eagle to the User Questionnaire discussed in *Section 6* above.

### **7.2 Owner / Key Site Manager**

Mr. Daniel Gurvich, Chief Financial Officer, was interviewed by Eagle on October 15, 2021. Information gathered from Mr. Gurvich is provided below and in other sections throughout this report. Mr. Gurvich indicated in response to the questionnaire that he has prior knowledge of any ASTs or USTs on Site. A copy of the Environmental Site Reconnaissance Questionnaire is provided in *Appendix D*.

### **7.3 Interview with State and/or Local Officials**

See Section 5.2. No information pertinent to identification of RECs was noted in local official interviews.



## **8.0 DATA GAPS**

The following data gaps were identified during performance of the Phase I ESA:

- Site records could not be obtained from the DEEP Records Center during the current investigation to supplement the State and Federal environmental database review, due to temporary access restrictions associated with the COVID-19 pandemic. Only limited records are currently available via DEEP Document Online Search Portal. However, the information available through the online review and by the EDR environmental database report was deemed sufficient to evaluate RECs.
- City of Hartford Building and Health Department records could not be accessed during the course of this investigation and other municipal department inquiries were limited to information available through telephone interviews or online portals, due to temporary public access restrictions that were in place associated with the COVID-19 pandemic. However, based on the information provided by the Environmental Database Review and observations recorded during the Site visit, available information was deemed sufficient to evaluate RECs.

None of the data gaps identified above were classified to be significant in this Phase I ESA.

## 9.0 VAPOR ENCROACHMENT SCREENING

In 2010, ASTM international issued its revised Standard E2600-10 entitled “Standard Guide for Vapor Encroachment Screening on Property Involved in Real Estate Transactions.” This standard guide has been adopted into the ASTM E1527-13 Phase I Environmental Site Assessment Standard. The purpose of the standard is to define good commercial and customary practice for real estate transactions in the United States for conducting a screening assessment directed solely at the likelihood for migrating vapors to encroach upon a target property (i.e. the Site) creating a vapor encroachment condition (VEC). The presence of vapors in a building that has migrated from a release to the environment (i.e. from a release outside of the building) can result in CERCLA liability. Thus, this screening serves to assess the likelihood of a VEC. Determining whether or not encroaching vapors result in a vapor intrusion problem requires further investigation that is beyond the scope of the standard.

A VEC is defined as the presence or likely presence of chemicals of concern (COC) vapors in the subsurface of the Site caused by the release of vapors from contaminated soil or groundwater on or near the Site. An area of concern (AOC) as defined in the E2600-10 is measured 0.33-miles from the Site for known or suspect contaminated sites with volatile organic compound (VOC) or semi-VOCs; 0.1-mile from the Site for known or suspect petroleum hydrocarbon releases. The identification of AOCs may be reduced if the groundwater flow direction is known relative to the Site. Critical distances are taken into account for contaminated groundwater plumes in any direction for COCs including petroleum light non-aqueous phase liquid (LNAPL) accumulating above the water table at a distance of 100 ft. from the edge of the plume to the Site and 30 ft. for dissolved volatile petroleum hydrocarbons.

A Vapor Encroachment Screen (VES) was obtained by Eagle via EDR. Several nearby sources of underground petroleum were identified in the vicinity. However, based on the VES assessment and the Site reconnaissance, there is low potential that a VEC exists at the Site. A copy of the VES report is provided in *Appendix A*.

## 10.0 CONNECTICUT TRANSFER ACT STATUS

The State of Connecticut Property Transfer Law (the “Transfer Act”), described in Sections 22a-134a through 22a-134e of the Connecticut General Statutes, requires the disclosure of environmental conditions when certain real properties and/or businesses are transferred. The law applies only to those properties that are deemed to be “establishments” as defined under the law. As defined by the Transfer Act, an establishment is:

*... any real property at which or any business operation from which (A) on or after November 19, 1980, there was generated, except as the result of (i) remediation of polluted soil, groundwater or sediment, or (ii) the removal or abatement of building materials, more than one hundred kilograms of hazardous waste in any one month, (B) hazardous waste generated at a different location was recycled, reclaimed, reused, stored, handled, treated, transported or disposed of, (C) the process of dry cleaning was conducted on or after May 1, 1967, (D) furniture stripping was conducted on or after May 1, 1967, or (E) a vehicle body repair facility was located on or after May 1, 1967.*

If the Site is determined to be an establishment, DEEP reporting and involvement may be required in order to transfer the property, and DEEP will require identification, delineation, and remediation of all environmental concerns in accordance with Connecticut’s Remediation Standard Regulations.

Several manifests documenting shipments of hazardous waste during the 2000’s were identified for the “76-102 Pliny Street” address during the current investigation. Based on information from previous investigations, these hazardous waste shipments were reportedly related to activities on the parcel adjacent to the Site, and may have resulted from activities that would be exempt from consideration under the Transfer Act, such as soil remediation and lead abatement. Based on the available information, Eagle does not believe the identified hazardous waste manifests would qualify the Site as an Establishment under the Transfer Act. However, determining applicability of the Transfer Act to a property is ultimately a legal decision. Legal counsel should be consulted if a definitive determination of Transfer Act status is desired.

## 11.0 FINDINGS AND CONCLUSIONS

Eagle Environmental prepared this Phase I ESA report in general conformance with the scope and limitations of ASTM Practice E1527-13. Any exceptions to, or deletions from, this practice are described in Section 1.2 of this report.

The major findings of the Phase I ESA are as follows:

- The Site consists of one parcel of land with an area of approximately 1.12 acres. The Site contains one two-story building, as well as associated landscaped areas and paved parking areas.
- The current Site building was built in 1910. The Site is currently owned by My Sister's Place, Inc. Industrial activities were conducted at the Site prior to 1983. The Site operated as a multi-family apartment building from 1989 until circa 2017, but is currently vacant.
- The Site building has a partial basement with an associated boiler room. The Site building utilizes natural gas heat. The Site has historically been connected to public water and sewer service, but these utility services are currently inactive. No chemical storage was observed in the Site building at the time of the Phase I site inspection.
- No aboveground or underground storage tanks were observed on Site.
- One pad-mounted electrical transformer was observed on the Site. No staining or other evidence of a dielectric fluid release was observed during the Phase I site inspection.
- Several nearby properties with listed hazardous waste generation and/or underground storage tank activity were identified. Based on distance from the Site and/or remediation documentation, potential releases on these properties would not be expected to have adversely impacted the Site.

Based on the completed Phase I Site Assessment, no *Recognized Environmental Conditions* have been identified in connection with the Site. One *Historical REC* (HREC) was identified with respect to the Site during the current investigation:

**HREC No.1 – Petroleum-Impacted Soil:** Previous environmental investigation reports indicate that petroleum-impacted soil was reported to have been encountered beneath a portion of the Site building's basement during environmental investigations in the late 1980's. An unspecified quantity of contaminated soil from this area was reportedly excavated and disposed off-site, and the reports indicate that DEP (now DEEP) issued a concurrence in June 1989 to the environmental consultant's determination that all necessary remedial action had been completed. Given the prior DEEP determination, no further action is deemed necessary regarding this issue.

Eagle has followed the guidelines described in ASTM E1527 13 to identify the RECs at this Site in a manner consistent with standard practice in the industry; however, as indicated in the ASTM standard, "No environmental site assessment can wholly eliminate uncertainty regarding the potential for RECs in connection with a property. Performance of this practice is intended to reduce, but not eliminate, uncertainty regarding the potential for RECs in connection with a property, and the practice recognizes reasonable limits of time and cost."

## **12.0 LIMITATIONS**

This report and all associated work products provided in connection with the performance of this Phase I Site Assessment are subject to the following limitations.

The report was based on the observations of Eagle Environmental, Inc. (Eagle) of the Site condition and a review of information provided by the state and local officials and information and representations made by other parties and on information contained in the files of State and/or local agencies made available to Eagle at the time of the Site assessment. To the extent that such files are missing, incomplete or not provided, Eagle is not responsible. Although there may have been some degree of overlap in the information provided by these various sources, Eagle did not attempt to independently verify the accuracy or completeness of all information reviewed or received during the course of this Phase I ESA.

The purpose of this report is to assess the observable characteristics of the subject Site with respect to the presence of potential environmental contamination, such as potentially hazardous waste or petroleum and chemical products and wastes as defined in Connecticut General Statutes section 22a-452. No specific attempt was made to check the compliance of present or past owners or operators of the Sites with Federal, State or local laws and regulations, environmental or otherwise.

Eagle's work presented herein was performed in accordance with generally accepted practices of other consultants undertaking similar studies at the same time and in the same geographical area, and Eagle observed that degree of care and skill generally exercised by other consultants under similar circumstances and conditions. Eagle's findings and conclusions must be considered not as scientific certainties, but as a professional opinion concerning the significance of the limited data gathered during the course of the Program. Specifically, Eagle does not and cannot represent that the Sites contains no hazardous material, oil, or other latent condition beyond that observed by Eagle during preparation of this report.

## 13.0 REFERENCES

Aerial photographs from various sources, accessed via EDR Aerial Photo Decade Package on October 12, 2021. Photographs were reviewed for the years 1934, 1941, 1943, 1951, 1958, 1962, 1967, 1970, 1972, 1985, 1989, 1992, 1995, 2005, 2008, 2012, and 2016.

Certified Sanborn® Fire Insurance Maps, accessed via EDR Certified Sanborn® Map Report on October 12, 2021. Maps were reviewed for the years 1900, 1917, 1920, 1922, 1950, and 1979.

City Directories from EDR Digital Archive, Johnson's City Directory, and Price & Lee's City Directory, accessed via EDR City Directory Image Report on October 15, 2021. City Directories were reviewed for the 1920, 1925, 1936, 1941, 1946, 1951, 1956, 1960, 1968, 1986, 1992, 1995, 2000, 2005, 2010, 2014, and 2017.

Connecticut Assessor's Online Database, Bridgeport Tax Assessor's Database: October 27, 2021.

Connecticut Department of Energy and Environmental Protection (DEEP), Water Quality Standards, regulations adopted October 10, 2013.

Connecticut Environmental Conditions Online (CTECO). Online GIS viewer of environmental database information ([www.cteco.uconn.edu](http://www.cteco.uconn.edu)) provided by the University of Connecticut, in cooperation with DEEP, accessed on October 27, 2021.

GeoQuest, Inc., 2017, Phase I Environmental Site Assessment, 102 Pliny Street, Hartford, Connecticut; prepared for My Sister's Place, dated June 2017.

Google Earth "Street View", 102 Pliny Street, Bristol, Connecticut. October 27, 2021.

Rodgers, John, Bedrock Geological Map of Connecticut, USGS, 1985. October 27, 2021.

Stone, Janet Radway, et al. Surficial Materials Map of Connecticut, USGS, 1992. October 27, 2021.

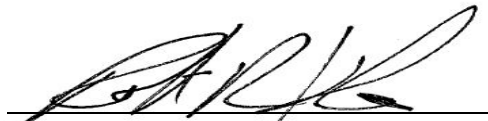
United States Geological Survey (USGS) historical topographic maps, accessed via EDR Historical Topo Map Report on October 12, 2021. Map source sheets were reviewed for the years 1892, 1906, 1928, 1945, 1952, 1964, 1972, 1984, 1992, 1994, and 2012.

Vapor Encroachment Screen, accessed via EDR Vapor Encroachment Screen Report on November 9, 2021.

## **14.0 QUALIFICATIONS OF ENVIRONMENTAL PROFESSIONAL**

I declare that, to the best of my professional knowledge and belief, I meet the definition of an Environmental Professional as defined in “§312.10 of 40 CFR §312” and I have the specific qualifications based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed the all appropriate inquiries in general conformance with the standards and practices set forth in 40 CFR Part 312.

Mr. Robert Kovach is a Licensed Environmental Professional (LEP) in Connecticut and has over 30 years of environmental experience conducting site assessments, field investigations, and remedial actions in Connecticut and has a Bachelor of Science degree in Quantitative Geology and a Master of Science degree in Management.

A handwritten signature in black ink, appearing to read 'R. Kovach', is written over a horizontal line.

Robert R. Kovach, II, LEP, CPG  
Senior Manager, Environmental Sciences

**EXHIBIT A**  
**SITE PHOTOGRAPHS**



## PHOTO LOG

**EAGLE ENVIRONMENTAL, INC.**

**8 SOUTH MAIN STREET SUITE 3, TERRYVILLE, CT 06786**

**Project No: 21-175.10T2**

**Project Address: 102 Pliny Street, Hartford, CT**



Photo #1

102 Pliny Street – East Façade



Photo #2

Basement Mechanical Room



Photo #3

Basement Mechanical Room



Photo #4

Basement Boiler Room



Photo #5

Basement Boiler Room



Photo #6

Basement Boiler Room

## PHOTO LOG

EAGLE ENVIRONMENTAL, INC.

8 SOUTH MAIN STREET SUITE 3, TERRYVILLE, CT 06786

Project No: 21-175.10T2

Project Address: 102 Pliny Street, Hartford, CT



Photo #7

Basement Boiler Room



Photo #8

Basement Boiler Room



Photo #9

Basement Boiler Room



Photo #10

Pad-Mounted Electrical Transformer



Photo #11

Municipal Trash Receptacles



Photo #12

Exterior Storage Sheds

**LIST OF FIGURES**

**SL-1 SITE LOCATION PLAN**

**SL-2 TOPOGRAPHICAL SITE LOCATION PLAN**

**SP-1 SITE PLAN**





## SITE LOCATION PLAN

SCALE: 1" = 200'



**EAGLE**  
Environmental, Inc.

8 SOUTH MAIN STREET, SUITE 3  
TERRYVILLE, CONNECTICUT 06786  
860-589-8257

PHASE I ENVIRONMENTAL SITE ASSESSMENT  
COMMUNITY HOUSING AUTHORITY  
102 PLINY STREET  
HARTFORD, CONNECTICUT

DATE: 10/18/2021

PROJECT NO.: 21-075.10T2

DRAWN BY: BB

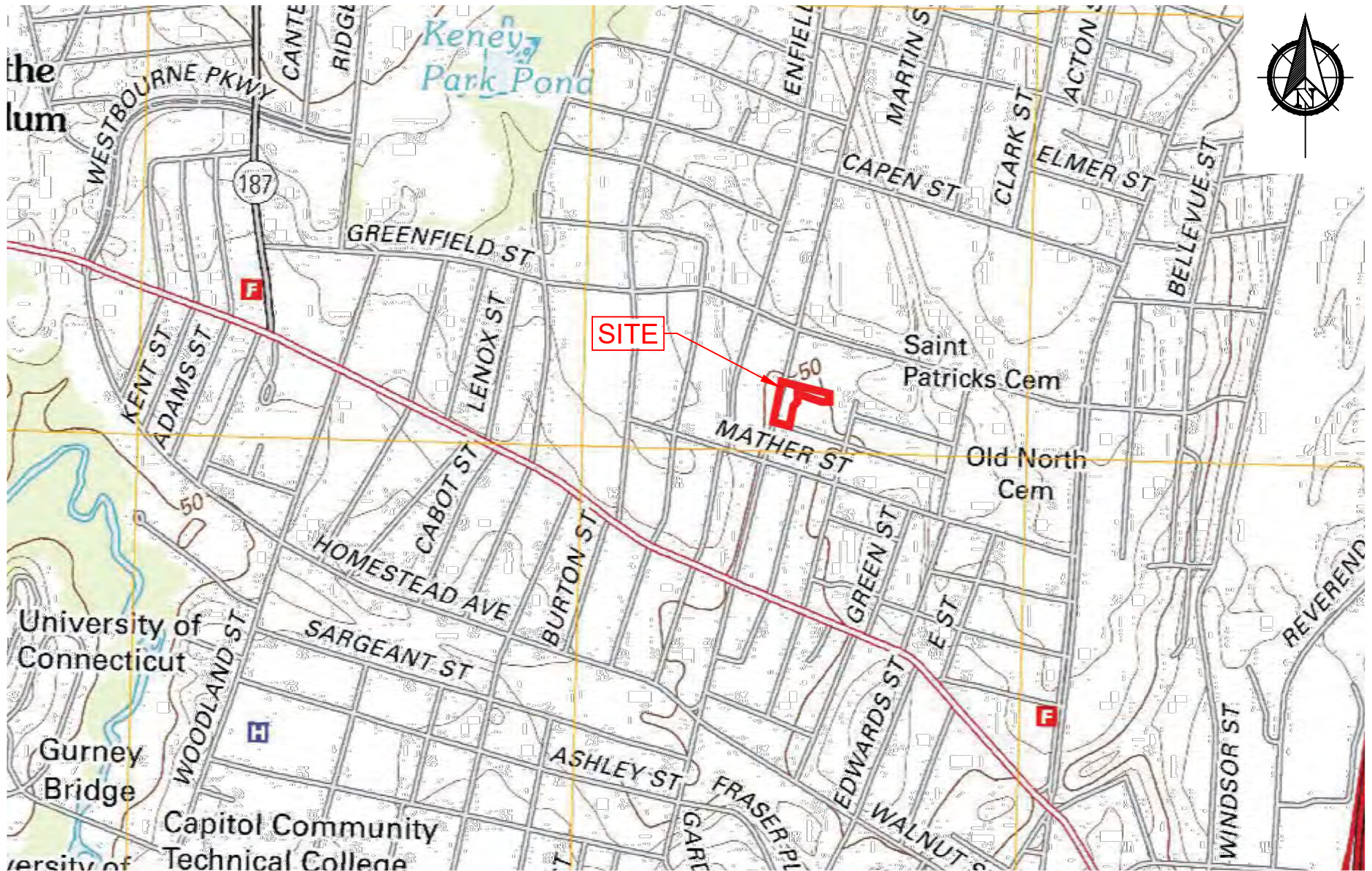
REVIEWED BY: RK

SHEET NO.

**SL-1**

SHEET 1 OF 3





## TOPOGRAPHICAL SITE LOCATION PLAN

SCALE: 1" = 1000'



**EAGLE**  
Environmental, Inc.

8 SOUTH MAIN STREET, SUITE 3  
TERRYVILLE, CONNECTICUT 06786  
860-589-8257

PHASE I ENVIRONMENTAL SITE ASSESSMENT  
COMMUNITY HOUSING AUTHORITY  
102 PLINY STREET  
HARTFORD, CONNECTICUT

DATE: 10/18/2021

PROJECT NO.: 21-075.10T2

DRAWN BY: BB

REVIEWED BY: RK

SHEET NO.

**SL-2**

SHEET 2 OF 3



TRASH RECEPTACLE  
DUMPSTERS

STORAGE SHEDS

102  
PLINY  
STREET

ASPHALT  
PARKING  
AREA

BUILDING NOT  
IN SCOPE

PAD MOUNTED  
TRANSFORMER

GARDEN STREET

PLINY STREET

## SITE PLAN

SCALE: 1" = 60'



**EAGLE**  
Environmental, Inc.

8 SOUTH MAIN STREET, SUITE 3  
TERRYVILLE, CONNECTICUT 06786  
860-589-8257

PHASE I ENVIRONMENTAL SITE ASSESSMENT  
COMMUNITY HOUSING AUTHORITY  
102 PLINY STREET  
HARTFORD, CONNECTICUT

DATE: 10/18/2021

PROJECT NO.: 21-075.10T2

DRAWN BY: BB

REVIEWED BY: RK

**SHEET NO.**

**SP-1**

SHEET 3 OF 3



November 8, 2021

Mr. Daniel Gurvich  
Chief Financial Officer  
Community Housing Authority, Inc.  
221 Main Street, 4<sup>th</sup> Floor  
Hartford, Connecticut 06106

**RE: Pre-Renovation Hazardous Building Materials Inspection Report**  
**102 Pliny Street**  
**Hartford, Connecticut**  
**Eagle Project No. 21-175.10T1**

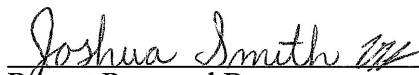
Dear Mr. Gurvich:

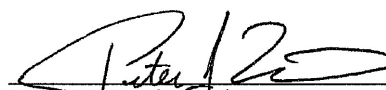
Please find the report for the pre-renovation hazardous building materials inspection conducted at the multi-family residential building located at 102 Pliny Street in Hartford, Connecticut. The scope of services included an asbestos-containing materials inspection, a lead-based paint screen, lead in drinking water sampling, lead in soil evaluation, a visual assessment for Polychlorinated Biphenyls (PCB's) in caulk and window glazing compounds, radon gas testing, a visual inspection for microbial contamination, and an inspection for universal waste materials.

The inspection was performed in general accordance with the Connecticut Housing Finance Authority (CHFA) Construction Guidelines: Environmental & Hazardous Materials Review 2017 and Eagle Environmental, Inc.'s Proposal No. 21-330 dated September 15, 2021.

Please do not hesitate to contact us if you have any questions regarding the contents of this report.

Sincerely,  
**Eagle Environmental, Inc.**

  
Report Prepared By:  
Joshua Smith  
Environmental Consultant II

  
Report Reviewed By:  
Pete Folino  
Principal

Z:\2021 Files\2021 Reports\Community Housing Advocates\Inspection\102 Pliny St - CHFA PreReno Haz Report.doc



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Appendix H	Eagle Environmental Inc. Licenses and Laboratory Certificates

## **1. INTRODUCTION**

On October 12 and 13, 2021 Eagle Environmental, Inc. (Eagle) conducted a pre-renovation hazardous building materials inspection at the multi-family residential building located at 102 Pliny Street in Hartford, Connecticut (Site). The scope of services included an inspection for asbestos-containing materials, a lead-based paint screen, lead in soil evaluation, a visual assessment for Polychlorinated Biphenyls (PCB's) in caulks and window glazing compounds, Radon gas testing, a visual inspection for microbial contamination, and an inspection for universal waste materials.

### **1.1 Building Description**

The subject building located at 120 Pliny Street is a two-story structure of brick construction. The structure was built in 1910 and underwent significant renovations in the 1980's. Site sources indicated that the building was gut renovated under a Department of Housing (DOH) funded project. The building's architectural systems and finishes including walls, ceilings, doors windows and flooring, and mechanical and plumbing systems, appear to all have been replaced during the gut renovation in the 1980's.

The building is partially constructed slab on grade and has a partial basement. The mechanical equipment consists of a gas fired hot water baseboard system with copper fin-tube radiators. The common areas appear to also be serviced by rooftop forced air ventilation systems. The hot water baseboard distribution system is insulated with fiberglass and the rooftop ventilation ducts are uninsulated throughout the building. The basement piping is exposed, and the mechanical and plumbing piping are contained within the walls on the upper floors. A single gas-fired boiler is located in the basement which services all twenty (20) residential units within the structure. The interior walls and ceilings are of sheetrock and joint compound construction. The window frames and sashes are of aluminum construction. The door frames are metal with primarily wood doors. The floors are finished with various resilient flooring finishes including vinyl floor tile, linoleum, ceramic floor tile, and carpet. The exterior facades are brick. The roof is flat and consists of a rubber membrane, which was not included as a part of this inspection.

## **2. SCOPE OF INSPECTION**

The Scope of Services pertained to the accessible interior spaces and exteriors of the Site building excluding the roof. Eagle performed an asbestos-containing materials inspection, lead-based paint screen, an inspection for universal waste materials, Radon testing, a visual assessment for Polychlorinated Biphenyls in caulk and glazing compounds, and a microbial contamination inspection.

The asbestos inspection was intended to meet pre-renovation inspection criteria. The roof was not included as part of the inspection.

Lead-based paint screening was performed within accessible dwelling unit interiors and on the building's exterior. The screening was not comprehensive but included representative testing of large-scale items such as walls, ceilings, doors, windows, and trim. The building's gut renovation in the 1980's resulted in the replacement of original painted surfaces throughout the structure. Lead in soil sampling was also performed around the structure where bare soil areas were identified.

Universal waste materials were quantified throughout the building. A visual inspection for PCB caulks and window glazing compounds was performed, but no sampling was conducted.

Radon testing was conducted in the first floor of the building. The Radon testing was performed concurrently with the other inspection work at the Site.

An inspection for microbial contamination and water incursion into the building was performed throughout the building. The microbial inspection was visual-only in nature and did not include destructive inspection or sampling.

The Scope of Services is further defined by referencing the Connecticut Housing Finance Authority (CHFA) Construction Guidelines: Environmental & Hazardous Materials Review 2017. This document outlines the environmental hazards requiring review. Eagle referenced the CHFA environmental document and has included the required components into this Scope of Services. The Scope of Services is also defined in Eagle's Proposal No. 21-330 dated September 15, 2021.

## **2.1 Asbestos Containing Materials**

The asbestos inspection was conducted in order to satisfy the United States Environmental Protection Agency (USEPA) National Emission Standard for Hazardous Air Pollutants Act (NESHAP) as amended November 20, 1990. The USEPA NESHAP final rule requires the identification and removal of all regulated ACM in an area of renovation prior to renovating the area if the renovation work will impact the ACM.

Asbestos-containing material testing is a required environmental component of the CHFA Environmental and Construction Guidelines: Environmental & Hazardous Material Review 2017.

The asbestos inspection was performed by Mr. Joshua Smith; a State of Connecticut licensed Asbestos Inspector (license #'s 000975).

## **2.2 Lead-based Paint**

### **2.2.1 X-Ray Fluorescence Screen**

Eagle performed a lead-based paint screen of the interior and exterior of the buildings to determine the presence or absence of lead-based paint on painted, stained, and varnished surfaces. Testing was performed utilizing an X-Ray Fluorescence (XRF) analyzer. The lead-based paint screen is not intended to be a comprehensive lead-based paint inspection but is intended to provide an order of magnitude as to the frequency of lead-based paint on painted surfaces. The lead-based paint screen also evaluates the condition of identified lead-based paint to determine if lead-based paint hazards in the form of peeling paint are present.

The lead-based paint testing data presented in this report should give the report user an understanding of the frequency, location, and condition of lead-based paint on building surfaces within and on the Site buildings. Untested surfaces should be assumed to contain lead-based paint until tested and proven otherwise. The testing data should also assist the report user in planning property acquisitions and performing renovation work compliantly with applicable lead-

based paint regulations. Lead-based paint testing is a required environmental component of the CHFA Environmental and Construction Guidelines: Environmental & Hazardous Material Review 2017.

The lead-based paint screen was performed by Ms. Emily-Anne Deutsch; a State of Connecticut licensed Lead Inspector/Risk Assessor (license #002263).

### **2.2.2 Lead In Drinking Water Sampling**

Eagle did not perform Lead (Pb) in drinking water sampling due to water service being disconnected to the building.

Lead in drinking water is a required environmental component of the CHFA Environmental and Construction Guidelines: Environmental & Hazardous Material Review 2017 and will need to be performed once water service is re-established.

### **2.2.3 Lead in Soil Sampling**

Eagle performed a lead in soil evaluation of bare soil areas at the Site. The visual assessment included the assessment of ground cover around the Site building. Bare soil areas, which contain lead above the state and federal standard, may be a potential exposure pathway to children who may occupy the structure in the future. The lead in soil assessment was limited to within the boundaries of the Site. Eagle identified one (1) location of bare soil requiring sampling. The soil assessment was performed by Ms. Emily-Anne Detusch; a State of Connecticut licensed Lead Inspector/Risk Assessor (License #002263).

A lead soil evaluation is a required environmental component of the CHFA Environmental and Construction Guidelines: Environmental & Hazardous Material Review 2017.

## **2.3 Polychlorinated Biphenyls (PCB) in Bulk Source Materials**

Eagle performed a visual inspection for suspect Polychlorinated Biphenyl (PCB) caulk and glazing compound in the Site building. PCBs have been identified by the USEPA as a concern in caulk and glazing compounds. The USEPA has identified numerous cases where PCBs have been added to these materials between 1930 and 1979 to improve adhesion and flexibility.

The USEPA regulates the removal and disposal of PCB-containing materials if the concentration of PCB's are found to contain equal to or greater than fifty (50) parts-per-million (ppm). The USEPA also regulates soil and adjacent substrate materials contaminated by PCB-containing materials containing greater than or equal to fifty (50) ppm if the soil or substrates contain greater than one (1) ppm PCB.

The DEEP regulates the removal and disposal of source materials, soil, or substrate materials with PCB concentrations in excess of one (1) ppm. Materials with PCB concentrations less than one (1) ppm are not regulated by USEPA or DEEP and their unrestricted use or disposal with regard to PCB is not subject to State or Federal Regulation.

PCB testing is a required environmental component of the CHFA Environmental and Construction Guidelines: Environmental & Hazardous Material Review 2017. However, due to the renovations performed at the Site building in the 1980s, Eagle identified only limited quantities of original suspect PCB-containing caulk and glazing compound at the Site building. The limited materials are presumed to be PCB-containing greater than fifty (50) ppm.

## **2.4 Universal Waste Materials and Other Environmental Concerns**

### **2.4.1 Polychlorinated Biphenyls (PCB) and Di-ethylhexylphthalate (DEHP) Containing Items**

PCB and DEHP lighting ballasts and electrical equipment, including capacitors and switches that contain PCBs, are regulated under the Toxic Substances Control Act of 1976 (TSCA) which bans the manufacturing and distribution of PCBs and regulates their storage and disposal.

PCBs and DEHP can be found in a number of items, including lighting ballast and electrical equipment, including capacitors and switches. DEHP and PCB-containing items such as these must be managed and disposed of in accordance with special requirements. A visual inspection for PCB and DEHP containing items was performed within the Site building.

### **2.4.2 Mercury Containing Items**

Fluorescent lamps, thermostats, mercury switches, manometers, natural gas meters and other items can contain enough mercury to be classified as a special waste, and therefore may not be disposed of as regular construction debris. The mercury and mercury vapors associated with these products must be reclaimed prior to disposal or recycling of the products. A visual inspection for the presence of fluorescent lamps, thermostats and switches potentially containing mercury was performed within the limited areas inspected at the Site building.

### **2.4.3 Used Electronics and Batteries**

Used electronics and batteries may contain enough lead, mercury, cadmium or acid electrolytes to be classified as universal waste. In such cases, they may not be disposed of as regular construction debris. A visual inspection for the presence of used electronic devices was performed within the Site building.

### **2.4.4 Chlorofluorocarbons**

Freon gas includes a number of gaseous, colorless chlorofluorocarbons (CFCs) that are commonly used as refrigerants. Freon is listed as a controlled substance by governments around the world. In the United States, the USEPA regulates the emission of Freon gas into the atmosphere due to its ozone depleting capabilities. Through Title VI, Stratospheric Ozone Protection, of the Clean Air Act Amendments of 1990, the USEPA regulates Freon gas and requires mandatory recycling and a ban on the intentional venting or releasing of refrigerants during maintenance, service and or repair. A visual inspection for the presence of building materials potentially containing Freon was performed within the limited areas inspected at the Site building.

### **2.4.5 Radon**

Radon is a naturally occurring gas produced by the breakdown of uranium in soil, rock, and water. Radon gas contributes to thousands of lung cancer deaths each year. Radon gas enters a building where the pressure inside the building is lower than the pressure in the soil around the building's foundation. Radon can also be present in well water and can enter a building during water usage. A small number of building products can also give off radon gas. Radon testing utilizing passive radon sampling canisters was performed.

### **2.4.6 Microbial Contamination**

Eagle performed a visual assessment of accessible areas within the limited areas inspected at the Site buildings where water incursion was evident. Indications of moisture impact such as staining, delamination, swelling, degradation, etc. were noted where present. Accessible surfaces of materials were examined for evidence of visible mold growth and accessible areas were assessed for musty, moldy or other malodors. The visual inspection was non-destructive.

## **3. INSPECTION PROTOCOLS**

### **3.1 Asbestos Containing Materials**

#### **3.1.1 Inspection**

The asbestos-containing materials (ACM) inspection included the accessible interior and exterior portions of the building excluding the roofing systems. Semi-destructive testing techniques were utilized during the inspection process. This included manually removing various layers of flooring materials, where feasible, utilizing hand tools to verify and sample individual layers of suspect ACM. The inspection was semi-destructive and included opening up walls or ceilings for inspection of interstitial spaces. To the best extent feasible, a reasonable effort was made to determine the presence or absence of suspect materials within concealed spaces.

Suspect building materials that are inaccessible for inspection and sampling are assumed to be ACM for the purpose of this report. These suspect materials are generally located in operational equipment, behind rigid walls and ceilings, under slabs or otherwise concealed areas of the building, including below grade materials.

During the inspection, suspect materials are located, sampled, quantified and the friability of the material is determined. Friable materials are those materials that hand pressure can crumble, pulverize or reduce to powder when dry. An estimated quantity of identified ACM is provided for positive materials only. The materials are quantified in linear or square feet, depending on the nature of the material.

#### **3.1.2 Bulk Sampling**

During the sampling process, suspect ACM is separated into three (3) USEPA categories. These categories are: Thermal System Insulation (TSI), Surfacing Materials (SURF) and Miscellaneous materials (MISC). TSI includes all materials used to prevent heat loss or gain or water condensation on mechanical systems.

Examples of TSI are pipe covering, boiler insulation, duct wrap and mudpack fitting cement. Surfacing ACM includes all ACM that is sprayed, towed or otherwise applied to an existing surface. These applications are most commonly used in fireproofing, decorative, and acoustical applications. Miscellaneous materials include all ACM not listed in thermal or surfacing, such as linoleum, vinyl asbestos flooring and ceiling tile.

The quantity of samples collected of each suspect ACM are intended to meet the USEPA sampling protocols for renovation.

### **3.1.3 Bulk Sample Analysis**

The samples of the suspect asbestos containing materials were sent to a State of Connecticut Department of Public Health (DPH) approved laboratory for analysis by Polarized Light Microscopy (PLM). PLM is the USEPA accepted method of analysis for identification of asbestos in bulk matrices. Samples are collected individually or in sets. When sets of samples are collected, each set is systematically analyzed until one (1) sample is determined to contain asbestos. Upon the determination of the presence of asbestos in one (1) sample in the set, analysis of the remaining samples in the set is discontinued. If no asbestos is observed during analysis of the set of samples, the suspect material is determined to be negative for asbestos content.

Sample analysis results are reported in percentage of asbestos and non-asbestos components. The USEPA defines any material that contains greater than one percent ( $>1\%$ ) asbestos, utilizing PLM, as being an asbestos-containing material (ACM). Suspect materials containing greater than one percent ( $>1\%$ ) asbestos utilizing the PLM Point Count Method and the NOB TEM method are also considered to be asbestos-containing. Materials determined to contain greater than one percent ( $>1\%$ ) asbestos is regulated by the USEPA, the State of Connecticut Department of Public Health and Department of Energy and Environmental Protection and the United States Department of Labor. Sample results indicating “no asbestos detected” (NAD) are specified as non-asbestos containing materials. Samples results indicating “Did Not Analyze” (DNA) are not analyzed due to the stop on first positive request to the laboratory.

#### **3.1.3.1 Friable ACM Analysis**

Certain samples of friable materials shown to contain less than ten percent ( $<10\%$ ) asbestos are analyzed further by the “Point Count Method”. This procedure is recommended by the United States Environmental Protection Agency to confirm friable bulk samples shown to have less than ten percent ( $<10\%$ ) asbestos by PLM to be definitively negative or positive for asbestos. This method is accepted as providing statistically reliable results when analyzing bulk samples with very low asbestos concentrations. Friable materials containing “Trace” or “less than one percent ( $<1\%$ )” asbestos must be analyzed by the PLM Point Count Method. No samples were further analyzed by the PLM Point Count Method for this project.

#### **3.1.3.2 Non Friable ACM Analysis**

Certain samples of organically bound non-friable materials shown to contain “less than one percent ( $<1\%$ ) asbestos”, “TRACE” or “NAD” are

recommended for analyses by the “NOB TEM ELAP 198.4 Method”. This procedure is recommended by the United States Environmental Protection Agency to further evaluate non-friable organically bound materials for asbestos. Suspect materials confirmed by NOB TEM to be “less than one percent (<1%) asbestos”, “TRACE” or “NAD” are considered non-asbestos containing. No samples were further analyzed by the NOB TEM Method for this project.

## **3.2 Lead-based Paint**

### **3.2.1 X-Ray Fluorescence Screen**

The lead-based paint screen was performed utilizing an X-Ray Fluorescence (XRF) Radiation Monitoring Device (RMD) Lead Paint Analyzer (LPA-1), serial number 1509 within the limits of the inspection areas. The screen included only accessible areas within the identified inspection areas and accessible building materials.

The lead-based paint screen included testing limited components and or surfaces throughout the structure. It is not the intent to test all painted components, but to identify on a broad scale the impact of lead paint as it relates to the disposal of lead paint contaminated debris and potential worker exposure issues. Generally, wall and ceiling surfaces, painted floors, window and door systems are tested. Other components such as baseboards, cabinets, columns, trim, etc. are tested on a limited basis. Component and surface locations are identified by side designations represented by the letters "A", "B", "C", and "D". The "A"-side is considered the front of the building with the "B", "C", and "D"-sides following in a clockwise order.

The data is presented on computer generated Lead Inspection Reports contained in Appendix C. The Summary Report provides an inventory of each surface coating that contains lead at or above 1.0 mg/cm<sup>2</sup>. The Detailed Report is an inventory of each tested surface on a room-by-room basis.

For the purpose of this report, the XRF results are separated into two (2) categories; high levels of lead ( $\geq 1.0$  mg/cm<sup>2</sup>) and low levels of lead (<1.0 mg/cm<sup>2</sup>). Building materials containing high levels of lead have a greater probability of creating worker exposures during construction than do building materials with low levels of lead. Additionally, lead waste characterization sampling is required for building materials containing high levels of lead ( $\geq 1.0$  mg/cm<sup>2</sup>) and will become a waste product as a result of demolition or renovation activities.

The U.S. Department of Labor Occupation Safety and Health Administration (OSHA) regulates lead dust exposure to workers in the construction industry under 29 CFR 1926.62 Lead Exposure in Construction; Interim Final Rule. Currently, OSHA does not define a threshold level of lead in paint that may cause worker exposure. Any detectable level of lead in paint (>0.0 mg/cm<sup>2</sup> +/- 0.3 mg/cm<sup>2</sup> by XRF or  $\geq 0.01$  % by AAS) requires task specific exposure monitoring.



### **3.2.2 Lead in Drinking Water Sampling**

Eagle did not perform Lead (Pb) in drinking water sampling due to water service not being established at the Site building. The plumbing piping was visually inspected and consists of copper piping soldered at the joints. The solder or flux may contain lead if the piping was installed prior to 1986.

### **3.2.3 Lead in Soil Sampling**

The intent of the soil evaluation was to determine if bare soil areas were present, which could be a potential lead in soil exposure pathway to children who may reside in the Site building in the future. Composite soil sampling was performed where bare soil areas were identified. Soil sampling was performed by collecting sub-samples from each bare soil area identified. A maximum of five (5) sub-samples were collected to form each composite sample. The soil sample was collected utilizing a hard shell fifty (50) mL centrifuge tube to collect the top half inch of bare soil at each sub-sample location. The sub-samples were composited in the field to form one composite sample.

The composite soil samples were transported to the laboratory under proper chain of custody and were analyzed by the Flame Atomic Absorption utilizing the SW846-7000B Method. Soil sample results are reported in mg/Kg.

## **3.3 Polychlorinated Biphenyls (PCB) in Bulk Source Materials**

### **3.3.1 Bulk Source Sampling**

Eagle did not conduct bulk “source” material sampling of caulks and window glazing compounds. The limited quantity of original suspect PCB-containing caulk and glazing compound remaining after the 1980s renovation are presumed to be PCB-containing greater than fifty (50) ppm.

The locations and material descriptions of presumed PCB-containing materials are summarized and attached as Table III.

## **3.4 Universal Waste Materials and Other Environmental Concerns**

### **3.4.1 PCB and Di-ethylhexylphthalate (DEHP) Containing Items**

A visual inspection for the presence of lighting ballasts and electrical equipment potentially containing PCB's or DEHP was performed within the inspection areas. Lighting ballasts and oil-filled capacitor manufactured after 1979 may have “NO PCB's” stamped on its casing. These are filled with oil which does not contain PCB's but may contain DEHP. Lighting ballasts and Capacitors with date stamps prior to 1979 or no date stamps are assumed to contain PCB's. Lighting ballasts and capacitors labeled as “No PCB's” are assumed to contain DEHP if the date stamp is illegible or non-existent. Electronic ballasts are not assumed to contain PCB's or DEHP.

#### **3.4.2 Mercury Containing Items**

During the visual inspection process, fluorescent, metal halide and sodium lamps are assumed to contain mercury vapors. Thermostatic controls, switches, manometers, capacitors and other used electronic components are inventoried during the inspection process.

#### **3.4.3 Used Electronics and Batteries**

An inventory of used electronics that may fall under the Universal Waste regulations was developed during the inspection. These materials include but are not limited to lead acid batteries in emergency lighting and exit signs and stored electronic equipment that may contain hazardous or regulated substances. Electronic components such as computers, copy machines, etc. that are in use at the time of the inspection are generally not included in the inventory.

#### **3.4.4 Chlorofluorocarbons**

Eagle inspected the building for compressor tanks associated with water fountains, portable air conditioning units, the indoor environmental cooling system and walk-in coolers or freezers where applicable. The inspectors also inspected rooftop HVAC units where present. These tanks are all assumed to contain Freon. The size and quantity of tanks are estimated and recorded.

#### **3.4.5 Radon**

Eagle placed five (5) radon canisters, including one blank and one duplicate, in various units throughout the first floor of the Site building. The canisters were placed by Mr. Joshua Smith on October 12, 2021, and were retrieved by Mr. Jonathan Vargas on October 15, 2021. The canisters were placed in dwelling units 2, 9, and 4 located on the first floor of the site building. The duplicate canister (labeled as unit 4A) was placed in unit 4.

The radon testing devices utilized for the radon measurements are Activated Charcoal Adsorption Devices or charcoal canisters. The canisters are placed in the center of each room where feasible. The testing locations are away from any drafts or excessive air movements and windows and doors remained closed during the testing period. The measurements that are taken are considered short-term tests. A short-term test is conducted from two (2) to ninety (90) days.

The charcoal canisters were sent to Radon Testing Corporation of America (RTCA) of Elmsford, New York for analysis. RTCA is listed in the USEPA Radon Measurement Proficiency (RMP) Program.

#### **3.4.6 Microbial Contamination**

Eagle performed a visual assessment of the interior and exterior of the buildings for areas of visible water incursion and visible microbial growth. The visual assessment included accessible areas within the buildings. Interstitial wall and ceiling spaces were evaluated where feasible.

The assessment focused on areas where water incursion could potentially occur through the building envelope. Additionally, a visual assessment of interior

surfaces of building finishes was performed for suspect visible mold growth and microbial or moisture damage, staining, or deterioration and the presence of malodors. No physical microbial sampling was performed.

#### **4. INSPECTION RESULTS**

##### **4.1 Asbestos Containing Materials**

During the course of the building inspection one hundred twenty-two (122) bulk samples of suspect ACM were collected and one hundred twenty-one (121) samples were analyzed by PLM based on the “stop on first positive” request to the laboratory.

From the one hundred twenty-two (121) samples analyzed, the building materials listed below were found to be ACM:

- Window glazing compound at stored windows - black

In addition, the following materials were assumed to be ACM:

- Roof drain insulation
- Pipe valve packings
- Boiler interior refractory materials

The stored windows with asbestos-containing window glazing compound are stacked together in a single location within the basement of the building and appear to be remnants of the previous renovation. The asbestos-containing window glazing compound was not identified on any of the currently installed replacement windows on the building.

The materials assumed to be ACM were not accessible for sampling at the time of the inspection.

The summaries of asbestos and non-asbestos materials are presented in Tables I and II, respectively. The asbestos analysis laboratory reports are provided in Appendix B.

Any suspect material not specifically identified in this report as non-ACM should be assumed to contain asbestos unless sample results prove otherwise. This report is not intended to serve as a Scope of Work or technical specification for asbestos abatement.

All regulated friable and regulated non-friable ACM must be removed prior to renovation activities if the materials will be impacted by renovation work. A State of Connecticut Licensed Asbestos Abatement Contractor must be retained to perform the removal work. Visual inspections and air clearances must be performed within each abatement area at the completion of the abatement work. The visual inspections and air clearances must be performed by a State of Connecticut licensed Asbestos Project Monitor. The abatement areas must meet final visual and air clearance inspection criteria prior to each area being re-occupied.

##### State of Connecticut Regulatory Notification Requirements

The Asbestos Abatement Contractor must submit a notice of asbestos abatement to the State of Connecticut Department of Public Health post marked or hand delivered ten (10) calendar days prior to the commencement of any asbestos abatement activities involving the abatement of greater than ten (10) linear feet or twenty-five (25) square feet of

asbestos-containing materials. The asbestos abatement notification satisfies the DPH regulatory requirements for demolition notification. For asbestos abatement projects involving less than ten (10) linear feet or twenty-five (25) square feet of asbestos-containing materials or projects where no regulated asbestos-containing materials are identified, the facility owner or any person who will be conducting demolition must submit a demolition notification to the State of Connecticut Department of Public Health post marked or hand delivered ten (10) days prior to the commencement of demolition activities.

As of December 14, 2017, the facility owner/operator must provide a notification of demolition and renovation under the USEPA National Emission Standard for Hazardous Air Pollutants (NESHAP) regulation 40 CFR Part 61 Subpart M. The facility owner must submit notification to the USEPA for all demolition projects ten (10) working days prior to all demolition projects, which fall under the NESHAP regulation regardless of the presence of asbestos-containing materials. The facility owner must also provide notification to the USEPA for all renovation project ten (10) working days prior to all renovation projects involving greater than one hundred sixty (>160) square feet or greater than two hundred sixty (>260) linear feet or thirty-five (35) cubic feet of regulated asbestos-containing materials.

State and federal notifications are completely independent of one another and both regulatory agencies must be notified when applicable.

## **4.2 Lead-based Paint**

### **4.2.1 X-Ray Fluorescence Screen**

A total of one hundred eighty (180) XRF readings, including instrument calibration readings, were collected during the lead-based paint screen performed in limited areas of the building. From the one hundred eighty (180) readings, none of the tested components and surfaces were found to contain high levels of lead.

The Summary Report of Lead Paint Inspection located in Appendix C contains a complete inventory of tested surfaces, none of which contain lead-based paint.

The U.S. Department of Labor Occupation Safety and Health Administration (OSHA) regulates lead-dust exposure to workers in the construction industry under 29 CFR 1926.62 Lead Exposure in Construction; Interim Final Rule. Currently, OSHA does not define a threshold level of lead in paint that may cause worker exposure. Any detectable level of lead in paint ( $>0.0 \text{ mg/cm}^2 \pm 0.3 \text{ mg/cm}^2$  by XRF or  $>0.01 \%$  by AAS) requires task specific exposure monitoring. This "initial exposure assessment" must be conducted by trained workers utilizing appropriate personal protective equipment. Exposure assessments must be conducted for each task where painted surfaces or components are disturbed.

Examples of task subject to initial monitoring when detectable levels of lead are identified include but are not limited to surface preparation for repainting, manual demolition of components with detectable levels of lead paint and the welding, cutting or grinding of steel with detectable levels of lead in paint.

A complete inventory of tested building materials is presented in Detailed Reports contained Appendix C.

#### 4.2.2 Lead in Drinking Water Sampling

Eagle did not perform Lead (Pb) in drinking water sampling due to the water service not being established at the building. The copper piping appears to have been replaced during the 1980's gut renovation work of the building but the solder may contain lead if installed after 1986. The kitchen and bathroom sink fixtures may also be sources of lead in the potable water at the Site and water sampling is the best way to determine if lead is leaching into the water system from the pipes and fixtures. Further investigation of lead in drinking water at the Site will be necessary to gain compliance with the CHFA Guidelines.

#### 4.2.3 Lead in Soil Sampling

Eagle performed a visual assessment for bare soil areas on the Site, which may pose a potential lead exposure risk to future occupants of the building. The lead in soil assessment included soil sampling.

Soil sampling is generally performed along the building's drip line, which is approximately 2-3 feet away from the foundation of the building, in bare soil areas in the mid-yard and in play areas. Soil sample results exceeding 400 mg/Kg represent a soil-lead hazard and may be treated with an interim control such as covering with landscaping material or establishing grass. Soil sample results greater than 5,000 mg/Kg along drip lines and mid-yard areas and greater than 1,200 mg/Kg in a child's play area require permanent abatement including soil removal or capping with a permanent material such as concrete or asphalt.

The locations of the soil samples and results of the analysis are presented in the following table:

Sample Number	Location	Result
10-13-ED-S01	Side C Dripline	270 mg/Kg

The soil sample results from the sampled bare soil area did not exceed the threshold of four hundred (400) mg/Kg and is not considered a lead hazard.

The soil testing laboratory report is provided in Appendix D.

#### 4.3 PCB in "Source" Samples

Eagle did not conduct bulk "source" material sampling of caulks and window glazing compounds. The limited quantity of suspect PCB-containing caulk and glazing compound remaining after the 1980s renovation are presumed to be PCB-containing greater than fifty (50) ppm. The only original source material identified during the inspection includes the six (6) original stored window sashes in the building. No other caulk or glazing was identified, which appeared original to the building.

The locations and material descriptions of presumed PCB-containing materials are summarized and attached as Table III.

## **4.4 Universal Waste Materials and Other Environmental Concerns**

### **4.4.1 PCB and Di-ethylhexylphthalate (DEHP) Containing Items**

No PCB containing light ballasts or DEHP containing lighting ballasts were identified within the structure.

Approximately twenty-six (26) capacitors associated with ovens and microwave ovens were identified during the inspection. The capacitors must be removed for recycling as part of the renovation work.

Approximately one hundred thirty-three (133) electronic ballasts were identified during the inspection. No further action is required for the electronic ballasts.

The associated inspection data is provided in Table IV.

### **4.4.2 Mercury Containing Items**

A total of approximately one thousand one hundred-twelve (1112) linear feet of fluorescent light tubes, sixty (60) round lamps, and three hundred thirty-six (336) compact fluorescent lamps were identified within the structure. The light tubes must be removed for recycling if it will become a waste material as a result of renovation activities.

No mercury containing thermostats were identified during the inspection.

The associated inspection data is provided in Table IV.

### **4.4.3 Used Electronics and Batteries**

A total of approximately thirteen (13) exit signs and three (3) fire alarms containing lead-acid/nickel cadmium batteries were identified during the inspection. The batteries must be removed for proper recycling if it will become a waste material as a result of renovation activities.

The associated inspection data is provided in Table IV.

### **4.4.4 Chlorofluorocarbons**

A total of four (4) portable AC units, each containing a one (1) liter Freon tank and 21 refrigerators, each containing a two (2) gallon Freon tank were identified during the inspection. The Freon must be reclaimed from the tanks prior to building renovation.

The associated inspection data is provided in Table IV.

### **4.4.5 Radon**

Radon is measured in Picocuries of radon per Liter of air or pCi/L. The USEPA has set a national action level of 4.0 pCi/L. Ambient concentrations of radon are approximately 0.4 pCi/L of radon for outside air. The USEPA recommends that short term tests that have results of 4.0 pCi/L or greater be confirmed with a

second short-term test. Two (2) short-term tests with results equal to or greater than 4.0 pCi/L require that radon mitigation be performed.

<b>Canister ID#</b>	<b>Test Start</b>	<b>Test Stop</b>	<b>Location</b>	<b>Results (pCi/L)</b>
2977484	10/12/21 11:50 AM	10/15/21 11:43 AM	Unit 2 LR	0.7 pCi/L
2977479	10/12/21 11:53 AM	10/15/21 11:47 AM	Unit 9 BR	0.8 pCi/L
2977500	10/12/21 11:55 AM	10/15/21 11:49 AM	Unit 4 LR	0.9 pCi/L
2977478	10/12/21 11:56 AM	10/15/21 11:50 AM	Unit 4A LR (Duplicate)	0.5 pCi/L
2977492	10/12/21 12:00 PM	10/15/21 12:00 PM	Blank	0.1 pCi/L

The results indicate that the radon levels at each test location was below the USEPA action level of 4.0 pCi/L at the time of the testing. No further action is required at this time. Quality control samples were within acceptable tolerances and the data is considered useable.

The radon testing laboratory report is provided in Appendix E.

#### **4.4.6 Microbial Contamination**

Eagle performed a visual assessment of the interior and exterior of the building to identify potential microbial growth and areas of water incursion. No physical sampling was performed.

Evidence of suspect microbial growth was visually identified on sheetrock walls and ceilings, carpet, upholstered furniture, stored belongings, bases of doors and on wood baseboards. Malodors and a musty smell were noted throughout the building. The building's heating and cooling system was non-operational at the time of the assessment. The microbial growth appeared to be the result of environmental conditions related to humidity in an unconditioned building.

Suspect microbial growth was most prevalent on the first-floor carpeted areas and within dwelling units and common rooms that received less daily sunlight compared to other areas. Moisture readings taken throughout the building using a Surveymaster POL5365 Protimeter indicated that the carpeted areas on the first floor were holding significant moisture. Additionally, evidence of historic water incursion through the roof was observed on the second floor. The site contact indicated that the roof was recently repaired. Provisions for mold remediation during renovation work should be considered.

All mold and water remediation work should be performed in accordance with the recommendations of the Institute of Inspection, Cleaning, and Restoration Certification (IICRC) S-500, Standard and Reference Guide for Professional Water Damage Restoration – Third Edition, the IICRC S-520, Standard and Reference Guide for Professional Mold Remediation – Second Edition, the New York City Department of Health and Mental Hygiene Guidelines on Assessment and Remediation on Fungi in Indoor Environments (issued November 2008) and the Connecticut Department of Public Health, Guidance for Mold Abatement Contractors.

Refer to Appendix F for observation notes.

#### **4.4.7 Urea Foam Formaldehyde**

Eagle inspection did not identify UFFI within the inspected areas. No additional action is recommended at this time.

### **5. COST ESTIMATES**

The cost estimate assumes the removal and disposal of the six (6) window sashes with asbestos-containing glazing compound and microbial remediation allowance. An allowance for microbial remediation has been established in the cost estimate to account for the removal of the microbial impacted building materials, engineering controls, drying, and disinfecting of surfaces. There may be a cost overlap in the overall estimate if the general demolition work (removal of walls, ceilings, flooring, building cleanout, etc.) is accounted for in that portion of the estimate.

This is a budgetary opinion of cost that is expected to be within -15 to + 30 percent of the actual cost. Eagle has no control over the cost of labor, materials, equipment, or services furnished by others, or over the Contractor or Contractors' methods of determining prices, or over competitive bidding or market conditions. Eagle's opinion of probable cost of abatement are made on the basis of Eagle's experience and qualifications and represent Eagle's judgment as an experienced and qualified consultant familiar with the abatement industry; but Eagle cannot and does not guarantee that proposals, bids or actual Total Project or Abatement Cost will not vary from opinions of probable cost prepared by Eagle. If, prior to the bidding or negotiating phase, the Owner wishes greater assurance as to Total Project or Abatement Cost, the Owner shall employ an independent cost estimator.

The cost estimates are provided in Appendix G.