

# REPORT

February 20, 2024

## ASTM Phase I Environmental Site Assessment

0 Bridge Street  
Bellows Falls (Rockingham), Vermont

Prepared for:  
Windham Regional Commission



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## EXECUTIVE SUMMARY

Weston & Sampson Engineers, Inc. (Weston & Sampson), on behalf of the Windham Regional Commission (WRC) and the Town of Rockingham, Vermont (the Town), has prepared this Phase I Environmental Site Assessment (ESA) for a 1.1-acre property, located at 0 Bridge Street in Bellows Falls (Rockingham), Vermont (the Subject Property).

Findings of the Phase I ESA are as follows:

- The earliest identified development of the Subject Property was as a railway turntable and residential buildings circa 1885. The railway turntable attached to the rail line running along the western edge of the Subject Property. Residential buildings were developed along the Connecticut River to the southwest. Between 1962 and 1971, the buildings on the Subject Property were demolished and the Subject property remained vacant until use as a parking lot began sometime before 1987.
- The Subject Property was formerly developed as a hardware store with multiple coal storage sheds. One residential building was located along Bridge Street. Multiple rail lines appear to terminate on the Subject Property and were likely used for loading and unloading coal. The former storage of coal on the Subject Property represents a REC.
- As noted above, a rail right-of-way has existed on or adjoining this parcel since at least 1885 (the earliest available record). Additionally, a railroad turntable was located on the Subject Property. Historical railroad operations involved the use of chemicals such as metals, pesticides (including lead arsenate), and constituents of oil or fuel (petroleum products). This historical high-risk use has the potential to impact subsurface media at the Subject Property and represents a REC.
- A degraded 55-gallon drum and an empty gas container were observed during field reconnaissance. The former contents of these containers are not known. Petroleum and/or hazardous materials potentially stored in these containers may have been released to the ground surface at the Subject Property and represents a REC.
- The area around the Subject Property has had a long history of diverse industrial uses including: paper mills, auto repair, machine shops, petroleum storage and railroad operations. Cumulative former uses have likely led to undocumented releases of hazardous substances and/or petroleum. For this reason, it is our opinion that the hazardous substance and/or petroleum impacts to the Subject Property from the long history of area industrial use represents a REC.
- The former Robertson Paper Company is also the recorded location of a measurable amount of Light Non-Aqueous Phase Liquid (LNAPL). Notably, LNAPL has been recorded less than 200 feet upgradient from the Subject Property. It is not known if LNAPL or associated vapors are present on the Subject Property. This represents a REC.
- The nature and extent of tetrachloroethylene (PCE) at the former Bellows Falls Waypoint site, adjacent the Subject Property to the west, has not been adequately defined to rule out potential impacts to subsurface conditions on the Subject Property and represents a REC.
- While no structures are presently located on the Subject Property, the potential for vapor intrusion related to the above-discussed LNAPL plume should be considered during redevelopment.
- The Subject Property is within an area designated by the Vermont Department of Environmental Conservation (VTDEC) as an Urban Background Area. Subsurface soil and fill material may be impacted by common urban contaminants such as arsenic, lead, and polycyclic aromatic hydrocarbons (PAHs). The likely presence of these common urban contaminants in soil is considered a REC.
- Waste manifests associated with the former Robertson Paper Company property suggests that groundwater in the vicinity of the Subject Property is impacted with per- and polyfluoroalkyl

substances (PFAS). PFAS compounds are not currently considered hazardous substances under CERCLA. Despite this, potential PFAS contamination is considered a Business Environmental Risk and should be considered during the proposed redevelopment of the Subject Property.

It is Weston & Sampson's opinion that additional investigation is appropriate to evaluate the RECs identified in this Phase I ESA.

## 1.0 INTRODUCTION

Weston & Sampson Engineers, Inc. (Weston & Sampson), on behalf of Windham Regional Commission (WRC) and the Town of Rockingham (The Town), has prepared this Phase I Environmental Site Assessment (ESA) for a 1.1-acre property located at 0 Bridge Street in Bellows Falls (a village in Rockingham), Vermont (the Subject Property). The Subject Property is vacant and used as a parking lot. **Figure 1** shows the general location of the Subject Property in Rockingham and **Figure 2** is a Site Plan showing pertinent details and surrounding area. **Appendix B** is a photograph log from the Subject Property reconnaissance.

This ESA was performed in accordance with the ASTM Standard Practice for Environmental Site Assessments: Phase I Site Assessment Process, Designation E1527-21 (the ASTM Standard Practice) and conforms with the EPA All Appropriate Inquiry (AAI) Rule. The Phase I ESA was performed to assess the Subject Property with respect to the range of potential contaminants within the scope of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA; 42 U.S.C. §9601). This practice is intended to help WRC meet any obligations detailed in **Section 2.8**.

### 1.1 Purpose

Weston & Sampson was requested by WRC to complete an ASTM Phase I ESA of the Subject Property in advance of potential redevelopment of the Subject Property. This practice is intended to permit the Town of Rockingham, Vermont (the Town) to satisfy one of the requirements to qualify for the innocent landowner, contiguous property owner, or bona fide prospective purchaser limitations on CERCLA liability: that is, the practices that constitute "all appropriate inquiry into the previous ownership and uses of the Subject Property consistent with good commercial or customary practice" as defined in 42 U.S.C. § 9601(35)(B).

The purpose of the Phase I ESA is to identify Recognized Environmental Conditions (RECs) in connection with the Subject Property at the time of the Subject Property evaluation. The term Recognized Environmental Condition refers to "(1) the presence of hazardous substances or petroleum products in, on, or at the subject property due to a release to the environment; (2) the likely presence of hazardous substances or petroleum products in, on, or at the subject property due to a release or likely release to the environment; or (3) the presence of hazardous substances or petroleum products in, on, or at the subject property under conditions that pose a material threat of future release to the environment."

The ASTM definition of REC does not include de minimis conditions, which generally do not present a threat to human health or the environment and would not be the subject of an enforcement action if brought to the attention of the appropriate governmental agencies.

The identification of RECs in connection with the Subject Property may impose an environmental liability on owners or operators of the Subject Property, reduce its value, or restrict its use or marketability. Further investigation may be warranted to evaluate the scope and extent of potential environmental liabilities.

Any significant scope-of-work additions, deletions or deviations to ASTM Practice E1527-21 are noted below or in pertinent sections of this report.

### 1.2 Scope of Work

This Phase I ESA was conducted using a standard of good commercial and customary practice consistent with the ASTM Standard Practice and included the following tasks:

- Review of previous environmental records and reports (if available)
- Regulatory records review
- Interviews (in-person, via phone, or via questionnaire)
- A Subject Property visit
- Evaluation of information and preparation of the report

Any significant scope-of-work additions, deletions, or deviations to the ASTM Standard Practice are noted below or in the corresponding sections of this report. A copy of the scope of services between Weston & Sampson and WRC, specifying the work to be performed and responsibilities of the User, is included in Appendix A.

Releases of contaminants not defined as hazardous substances under CERCLA, but for which state or tribal regulations may require cleanup (including "emerging contaminants"), if documented, are discussed in appropriate sections throughout this report and as findings in Section 9. In accordance with the ASTM Standard Practice, if such a release presents a "risk which can have material environmental or environmentally driven impact on the business associated the current or planned use," it is further defined as a Business Environmental Risk (BER) in Section 9.

Unless requested, a Phase I ESA does not include sampling or testing of air, soil, groundwater, surface water, or building materials. Although this Phase I ESA considers releases to all environmental media, including soil vapor, a formal vapor encroachment screening is not required by the Standard Practice, and is not included in this report.

### **1.3 Significant Assumptions**

There is a possibility that, even with the proper application of these methodologies, there may exist Subject Property conditions that were not reasonably identifiable. Weston & Sampson believes that the information obtained from the record review and the interviews is reliable; however, Weston & Sampson cannot, and does not, warrant or guarantee that the information provided by third-party sources is accurate or complete. The methodologies of this assessment are not intended to produce all-inclusive or comprehensive results, but to provide WRC and the Town with information relating to the presence or likely presence of RECs in connection with the Subject Property.

### **1.4 Limitations and Exceptions**

The findings, opinions, and conclusions provided by Weston & Sampson are based solely on the information provided in this document. Future investigations and/or information that was not available to Weston & Sampson may result in a modification of the report findings. Should additional information become available, that information should be provided to Weston & Sampson for review so that the report conclusions may be modified if necessary. The report conclusions are based on conditions observed at the Subject Property at the time of the investigation, information provided by the Town, information provided by Environmental Data Resources, Inc. (EDR), and information provided by federal, state, and local agencies.

This report has been prepared in accordance with the ASTM Standard Practice and generally accepted engineering and geological practices. No other warranty, express or implied, is made. This assessment did not include a review or audit of operational environmental compliance issues, or of any environmental management systems (EMS) that may exist at the Subject Property.

Section 4.6.2 of ASTM E1527-21 identifies five (5) components of a Phase I ESA that must be conducted or updated within 180 days prior to the date of acquisition, or the transaction, to maintain continued viability of the Report. The five (5) components and the dates on which they were conducted for this Phase I ESA are:

- 1) Interviews with owners, operators, and occupants — January 29, 2024
- 2) Searches for recorded environmental cleanup liens - User responsibility
- 3) Reviews of federal, tribal, state, and local government records - January 10, 2024
- 4) Visual inspections of the Subject Property and adjoining properties - January 10, 2024
- 5) The declaration of the environmental professional responsible for the assessment or update - February 15, 2024

### **1.5 Deviations**

Except for the limitations and exceptions discussed in Section 1.4, this Phase I ESA complies with the ASTM Standard Practice. Weston & Sampson did not deviate from the scope outlined in Section 1.2.

### **1.6 Special Terms and Conditions**

Authorization was given by WRC on December 22, 2023. Instructions as to the location of the Subject Property, access, and an explanation of the Subject Property and facilities to be assessed were provided by WRC and the Town.

### **1.7 Reliance**

This report may be distributed and relied upon only by WRC and the Town. Reliance on the information and conclusions in this report by any other person or entity is not authorized without the written consent of Weston & Sampson and WRC.

## 2.0 SUBJECT PROPERTY DESCRIPTION

### 2.1 Location and Legal Description

The Subject Property is located at 0 Bridge Street, Bellows Falls (a village in the Town of Rockingham), VT, and is identified by parcel identification number: 236060012. The approximate center of the Subject Property is located at:

- Latitude: 43.134752 North
- Longitude: -72.443255 West

### 2.2 Subject Property and Vicinity Description

The Subject Property is currently developed with a parking lot. Topography is generally level with a slight slope to the northwest. Groundcover consists primarily of bituminous asphalt, with a wooded area on the north end of the property. The Subject Property is accessed from Bridge Street to the south.

The surrounding area is primarily residential and commercial.

### 2.3 Current Use of the Subject Property

The Subject Property is currently used as a public parking lot.

### 2.4 Description of Structures and Other Improvements

The Subject Property is developed as a parking lot and has no buildings, structures, or other improvements.

### 2.5 Adjoining Property Information

Weston & Sampson identified the following information regarding adjoining properties:

Adjoining Properties			
Compass Direction	Occupant	Apparent Use	Comments
North	Sustainable Valley Group, Inc.	Commercial	A commercial building adjoins the Subject Property.
South	Great River Hydro, LLC.	Industrial	Hydroelectric dam present on the other side of Bridge Street. The Connecticut River adjoins the southwest property boundary.
East	Town of Rockingham	Commercial	Multiple commercial buildings adjoin the Subject Property
West	35 Chester Road LLC., Bellows Falls Area Development Corporation, Duncan Johnson, David Buckley	Industrial	A rail line adjoins the Subject Property.

### 3.0 SITE RECONNAISSANCE

Mr. Daniel Schuckers, Geologist I, of Weston & Sampson, conducted field reconnaissance on January 10, 2024. Mr. Lee Rosberg, Senior Project Manager at Weston & Sampson (the reviewer of this report), is defined as the Environmental Professional for this Phase I ESA and participated in the planning of the reconnaissance.

#### 3.1 Methodology and Limiting Conditions

Weston & Sampson conducted the Site Reconnaissance in accordance with Section 9 of the Standard Practice. The Site Reconnaissance consisted of observing the Subject Property boundaries from adjacent thoroughfares and/or accessible properties, and systematically traversing the Subject Property to provide an overlapping field of view, wherever possible.

Photographs of taken during the Site Reconnaissance are provided in **Appendix B**.

The following limiting conditions were encountered during the Site Reconnaissance:

- Snow cover limited observation of ground surface in some areas.

#### 3.2 General Setting

The Subject Property is approximately 1.1 acres and is used as a parking lot. Topography at the Subject Property slopes gently down to the west. Groundcover consists primarily of vegetated soil, asphalt, and wooded areas. The Subject Property is accessed from the southeast via an entrance from Bridge Street.

#### 3.3 Site Reconnaissance Findings

The following table contains a summary of the Site Reconnaissance findings:

Site Reconnaissance Findings Summary		
Condition / Feature	Observed	Comments
Hazardous Substances	No	
Petroleum Products	Yes	An empty gas can was observed on the Subject Property. No evidence of a release was observed in the vicinity of this container.
Underground Storage Tanks (USTs)	No	
Aboveground Storage Tanks (ASTs)	No	
Drums	Yes	A degraded, empty 55-gallon drum was observed on the Subject Property. No evidence of a release was observed in the vicinity of this container, however, the former contents of this drum are unknown
Other Suspect Containers	No	
Odors	No	
Equipment Likely to Contain Polychlorinated Biphenyls (PCBs)	No	
Interior Staining and Corrosion	No	
Heating and Cooling Equipment	No	
Drains and Sumps	No	
Pits, Ponds, and Lagoons	No	
Pools of Liquid	No	
Solid Waste Dumping and Landfills	No	

Condition / Feature	Observed	Comments
Stained Soil and Stressed Vegetation	No	
Wells	Yes	Groundwater monitoring wells were observed in Island Street near the former Robertson Paper Mill property but were not located on the Subject Property.
Wastewater and Septic Systems	No	

## 4.0 USER-PROVIDED INFORMATION

The information requested in the User Questionnaire is intended to assist the User in meeting their obligations under the ASTM Standard Practice and to assist the Environmental Professional in gathering evidence to identify RECs. The Town of Rockingham provided the User responses. A copy of the User Questionnaire is provided in Appendix C. The following subsections summarize User responses.

### 4.1 Owner, Property Manager, and Occupant Information

The Town of Rockingham, with offices at 7 The Square, Bellows Falls (Rockingham), Vermont, owns and operates the Subject Property. Gary Fox, Development Director with the Town of Rockingham, has been identified as the Key Site Manager and filled out the User Questionnaire for this project.

The Subject Property currently exists as a parking lot. The Subject Property has no residential occupants.

### 4.2 Environmental Liens

The Town reported no environmental cleanup liens filed against the Subject Property.

### 4.3 Activity and Use Limitations

The Town reported no Activity and Use Limitations (AULs) in place at the Subject Property.

### 4.4 Specialized Knowledge

The Town reported no specialized knowledge as it relates to the current and/or former use of the Subject Property.

### 4.5 Commonly Known or Reasonably Ascertainable Information

The Town reported no commonly known or reasonably ascertainable information about the Subject Property that would be indicative of releases or threatened releases.

### 4.6 Valuation Reduction for Environmental Issues

The Town reported that this Phase I ESA is being performed for reasons other than a property transfer. As such, there is no purchase price to which to compare the value of the Subject Property.

### 4.7 Degree of Obviousness of Contamination

The Town reported no obvious indicators that point to the presence or likely presence of contamination at the Subject Property.

### 4.8 Reason For Performing Phase I ESA

The Town reported that the Phase I ESA is being conducted as part of environmental due diligence prior to the potential redevelopment of the Subject Property.

### 4.9 User-Provided Documents

The Town did not provide any additional documents for review pertinent to the identification of RECs at the Subject Property, with the exception of the documents discussed in **Section 5.4**.

## 5.0 RECORDS REVIEW

Performance of a Phase I ESA in accordance with the ASTM Standard Practice requires the review of practically reviewable publicly available records to define the regulatory history, physical setting, and history of use of the Subject Property, adjoining properties, and pertinent surrounding properties. The regulatory review is performed to understand the nature of any releases that have occurred within approximate minimum search distances of the Subject Property that have the potential to impact environmental media (i.e. soil, groundwater, and vadose zone) at the Subject Property. Physical setting information is reviewed to evaluate the general soil conditions and the presence and movement of groundwater. Historical information sources are evaluated to develop the historical Subject Property uses, to the extent feasible, back to the first development Site or 1940, whichever is earlier. These reviews help identify the likelihood that past releases and/or uses have led to RECs.

Weston & Sampson used a third-party data provider, Environmental Data Resources (EDR) of Shelton, Connecticut, to develop this information and meet the requirements of the ASTM Standard Practice. All data sources are defined in the following sections of this report and are referenced in **Appendices E, F, G, H, and I**.

Weston & Sampson may have reviewed other records. Any additional records that are reviewed are cited in the appropriate section of the report and in **Section 12.0**.

### 5.1 Physical Setting Records Review

In accordance with the ASTM Standard Practice, physical setting sources were reviewed to understand the nature of the topography, geology (soil and bedrock), and hydrogeology of the Subject Property. In addition, observations made during the Subject Property reconnaissance and information provided by EDR were consulted. In general, Weston & Sampson reviews available topographic, soil, and geologic maps, as well as the online Vermont ANR Atlas.

#### 5.1.1 Topography

Topography of the Subject Property is generally flat with a slight slope west towards the Connecticut River. The Subject Property is situated approximately 308 feet above mean sea level. **Figure 1** depicts the Subject Property and surrounding topography based on the United States Geological Survey (USGS) Quadrangle 7.5-minute series topographic map.

#### 5.1.2 Geology

Surficial soil and bedrock geology sources included observation during the Subject Property reconnaissance, the United States Department of Agriculture (USDA) Soil Conservation Service (SCS) information provided by EDR, the online Vermont ANR Atlas, and the Geologic Map of Vermont (Ratcliffe, N.M. et al, 2011).

##### 5.1.2.1 Soil

Surficial soils at the Subject Property are classified as part of the Quonset and Warwick series.

##### 5.1.2.2 Bedrock

Bedrock geology at the Subject Property is mapped as Bethlehem Gneiss dating back to the Early Devonian. Bedrock was not observed during the Subject Property reconnaissance.

##### 5.1.3 Hydrogeology

The direction of local groundwater flow was inferred from a review of local surface topography. Weston & Sampson reviewed topographic maps to identify the nearest surface water bodies and Regulatory Agency (VT ANR Atlas) records for reports of groundwater elevations and flow directions.

5.1.3.1 Groundwater

It is anticipated that local groundwater flow is to the southwest toward the Connecticut River based on a review of available local groundwater elevation data.

5.1.3.2 Surface Water

The nearest surface water is the Connecticut River, adjoining the southwest edge of the Subject Property.

**5.2 Historical Records Review**

For this Phase I ESA, historical property information was compiled and analyzed to develop a history of the previous uses of the Subject Property, adjoining properties and surrounding area to help identify the likelihood of past uses having led to a REC for the subject property. EDR provided the following historical sources: Sanborn fire insurance maps, aerial photographs, topographic maps, and city directories.

5.2.1 Sanborn Fire Insurance Maps

Sanborn fire insurance maps were reviewed and are summarized in the table below. Fire insurance maps are included in **Appendix E**.

Sanborn Fire Insurance Maps Summary			
Year	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
1885	The Subject Property is developed with at least four residential buildings and a railway turntable.	Adjoining Property uses include: North: Skating Rink West: Railroad, Freight Storage Southwest: Connecticut River Southeast: Bridge Street East: Boarding/storage for Fall Mountain Paper Co.  High-risk uses identified in the adjoining properties deemed likely to impact environmental media at the Subject Property include: the railroad to the west.	The Subject Property is located in a mixed commercial, industrial, and residential area.  High-risk uses identified in the surrounding area deemed likely to impact environmental media at the Subject Property include: oil and coal storage on the other side of the railroad to the west and a paper mill to the south.
1891	No significant changes.	Adjoining Property uses include: North: Machine shops West: Railroad, Freight Storage Southwest: Connecticut River Southeast: Bridge Street East: Boarding/storage for Fall Mountain Paper Co.  High-risk uses identified in the adjoining properties deemed likely to impact environmental media at the Subject Property include: the railroad to the west and the machine shop to the north.	The Subject Property is located in a mixed commercial, industrial, and residential area.  High-risk uses identified in the surrounding area deemed likely to impact environmental media at the Subject Property include: oil and coal storage on the other side of the railroad to the west, two machine shops to the north on Depot Street, and a paper mill to the south.
1896	No significant changes.	No significant changes.	No significant changes.
1901	No significant changes.	No significant changes.	The Subject Property is located in a mixed commercial, industrial, and residential area.  High-risk uses identified in the surrounding area deemed likely

Year	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
			to impact environmental media at the Subject Property include: oil and coal storage on the other side of the railroad to the west, two machine shops to the north on Depot Street, a waxed paper plant to the east, and a paper mill to the south.
1906	The Subject Property is developed with multiple buildings including two coal storage sheds, one hardware store, and one dwelling. Additionally multiple rail lines appear to terminate on the Subject Property.	No significant changes.	The Subject Property is located in a mixed commercial, industrial, and residential area.  High-risk uses identified in the surrounding area deemed likely to impact environmental media at the Subject Property include: oil and coal storage on the other side of the railroad to the west, two machine shops to the north on Depot Street, and a paper mill and machine shop to the south.
1912	No significant changes.	Adjoining Property uses include: North: Machine shops West: Railroad, Freight Storage Southwest: Connecticut River Southeast: Bridge Street East: Machine Shops, Boarding/storage for Fall Mountain Paper Co.  High-risk uses identified in the adjoining properties deemed likely to impact environmental media at the Subject Property include: the railroad to the west and the machine shop to the north.	The Subject Property is located in a mixed commercial, industrial, and residential area.  High-risk uses identified in the surrounding area deemed likely to impact environmental media at the Subject Property include: oil and coal storage on the other side of the railroad to the west, multiple machine shops to the north on Depot Street, a steam power plant to the east, and a paper mill and machine shop to the south.
1920	No significant changes.	No significant changes.	The Subject Property is located in a mixed commercial, industrial, and residential area.  High-risk uses identified in the surrounding area deemed likely to impact environmental media at the Subject Property include: oil and coal storage on the other side of the railroad to the west, multiple machine shops to the north on Depot Street, a wax paper factory to the northeast, and paper products manufacturing and paper mill to the south.
1927	The Subject Property is developed with multiple buildings including two coal storage sheds and one hardware	No significant changes.	No significant changes.

Year	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
	store. Additionally multiple rail lines appear to terminate on the Subject Property.		
1949	No significant changes.	<p>Adjoining Property uses include:                      North: Machine shops                      West: Railroad, Freight Storage                      Southwest: Connecticut River                      Southeast: Bridge Street                      East: Newspaper printing, filling station, storage buildings</p> <p>High-risk uses identified in the adjoining properties deemed likely to impact environmental media at the Subject Property include: the railroad to the west, the machine shop to the north, and the filling station to the east.</p>	<p>The Subject Property is located in a mixed commercial, industrial, and residential area.</p> <p>High-risk uses identified in the surrounding area deemed likely to impact environmental media at the Subject Property include: oil and coal storage on the other side of the railroad to the west, multiple machine shops to the north on Depot Street, a wax paper factory to the northeast, a filling station on the corner of Bridge and Island street, and paper products manufacturing and paper mill to the south.</p>
1956	No significant changes.	No significant changes.	No significant changes.
1971	Subject Property buildings appear to have been demolished. One storage shed developed on the Subject Property.	<p>Adjoining Property uses include:                      North: Parking                      West: Railroad                      Southwest: Connecticut River                      Southeast: Bridge Street                      East: Newspaper printing, commercial and storage buildings</p> <p>High-risk uses identified in the adjoining properties deemed likely to impact environmental media at the Subject Property include: the railroad to the west and the filling station to the east.</p>	<p>The Subject Property is located in a mixed commercial, industrial, and residential area.</p> <p>High-risk uses identified in the surrounding area deemed likely to impact environmental media at the Subject Property include: oil and coal storage on the other side of the railroad to the west, multiple machine shops to the north on Depot Street, a wax paper factory to the northeast, and paper products manufacturing and paper mill to the south.</p>

### 5.2.2 Topographic Maps

Topographic maps were reviewed and are summarized in the table below. Topographic maps are included in **Appendix F**.

Topographic Maps Summary				
Year	Quad	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
1927	Bellows Falls	The Subject Property appears to be developed with one or more structures.	Adjoining properties appear to be developed for commercial and industrial use.	Surrounding area appears to be developed for residential, commercial, and industrial uses.
1930	Bellows Falls	No significant changes.	No significant changes.	No significant changes.
1957	Bellows Falls	No significant changes.	No significant changes.	No significant changes.
1985, 1985	Bellows Falls, Walpole	The Subject Property no longer has structures.	No significant changes.	Hydroelectric dam appears to be developed, the course of the river has changed south of the Subject Property.

Year	Quad	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
1998,1998	Walpole,Bellows Falls	No significant changes.	No significant changes.	No significant changes.
2012,2012	Bellows Falls,Walpole	No significant changes.	No significant changes.	No significant changes.
2015,2015	Bellows Falls,Walpole	No significant changes.	No significant changes.	No significant changes.
2018,2018	Bellows Falls,Walpole	No significant changes.	No significant changes.	No significant changes.
2021,2021	Bellows Falls,Walpole	No significant changes.	No significant changes.	No significant changes.

5.2.3 Aerial Photos

Aerial photographs were reviewed and are summarized in the table below. Aerial photographs are included in **Appendix G**.

Aerial Photos Summary			
Year	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
1952	Subject Property appears to be developed with a structure on the north side.	Adjoining properties appear to be developed for commercial and industrial use with a railway to the west.	Surrounding area appears to be developed for residential, commercial, and industrial uses.
1956	No significant changes.	No significant changes.	No significant changes.
1960	Specific details of the Subject Property are not discernable at this resolution	No significant changes.	No significant changes.
1962	No significant changes.	No significant changes.	No significant changes.
1977	No significant changes.	No significant changes.	No significant changes.
1987	Structure on Subject Property appears to have been removed. Subject Property is now a parking lot.	No significant changes.	No significant changes.
1992	No significant changes.	No significant changes.	No significant changes.
1998	No significant changes.	No significant changes.	No significant changes.
2008	No significant changes.	No significant changes.	No significant changes.
2011	No significant changes.	No significant changes.	No significant changes.
2014	No significant changes.	No significant changes.	No significant changes.
2018	No significant changes.	No significant changes.	No significant changes.

5.2.4 City Directories

City directories were reviewed and are summarized in the table below. City directories are included in **Appendix H**.

City Directories Summary			
Year	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
1964	Subject Property is not listed.	Commercial listings, including the following high-risk uses: 6 Island St: Ray's Auto Body Shop	Commercial and industrial listings, including the following high-risk uses: 20 Bridge St: Island Clean-O-Matic, Bristols Gulf Station Island St: Robertson Paper Co Inc 6 Island St: Ray's Auto Body

Year	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
			Shop 32 Island St: Liquidometer Metal Finishing Dept
1966	Subject Property is not listed.	Commercial listings, including the following high-risk uses: 6 Island St: Horley's Auto Body	Commercial and industrial listings, including the following high-risk uses: 20 Bridge St: Island Clean-O-Matic, Bristol's Gulf Station Island St: Robertson Paper Co Inc 6 Island St: Ray's Auto Body Shop 32 Island St: Liquidometer Metal Finishing Dept
1992	Subject Property is not listed.	No high risk uses identified.	Commercial and industrial listings, including the following high-risk uses: 33 Bridge St: Moore & Thompson Paper Co
1995	Subject Property is not listed.	Commercial listings, including the following high-risk uses: 8 Island St: Falzos Truck & Auto Repair, Franklin Auto Parts, Napa	Commercial and industrial listings, including the following high-risk uses: 33 Bridge St: Moore & Thompson Paper Co
2000	Subject Property is not listed.	Commercial listings, including the following high-risk uses: 8 Island St: Falzos Truck & Auto Repair, Franklin Auto Parts, Napa	Commercial and industrial listings, including the following high-risk uses: 22 Bridge St: Cota & Cota 33 Bridge St: Moore & Thompson Paper Co
2005	Subject Property is not listed.	Commercial listings, including the following high-risk uses: 8 Island St: Franklin Auto Parts	Commercial and industrial listings, including the following high-risk uses: 4 Bridge St: Ross Garage
2010	Subject Property is not listed.	Commercial listings, including the following high-risk uses: 8 Island St: B&B Auto, Napa Auto Parts	Commercial and industrial listings, including the following high-risk uses: 4 Bridge St: Ross Garage 33 Bridge St: Moore & Thompson Paper Co 40 Bridge St: Cota & Cota
2014	Subject Property is not listed.	Commercial listings, including the following high-risk uses: 8 Island St: B&B Auto, Napa Auto Parts	Commercial and industrial listings, including the following high-risk uses: 4 Bridge St: Ross Garage 33 Bridge St: Moore & Thompson Paper Co 40 Bridge St: Cota & Cota
2017	Subject Property is not listed.	Commercial listings, including the following high-risk uses: 8 Island St: B&B Auto, Napa Auto Parts	Commercial and industrial listings, including the following high-risk uses: 40 Bridge St: Cota & Cota 56 Bridge St: Cota & Cota Inc
2020	Subject Property is not listed.	Commercial listings, including the following high-risk uses:	Commercial and industrial listings, including the following

Year	Subject Property Comments	Adjoining Properties Comments	Surrounding Area Comments
		8 Island St: B&B Auto, Napa Auto Parts□	high-risk uses: 30 Bridge St: Ross Garage 33 Bridge St: Moore & Thompson Paper Co 40 Bridge St: Cota & Cota

### 5.2.5 Other Land Use Records

No other land use records were reviewed as a part of this Phase I ESA because adequate historical information was obtained from other sources.

### 5.2.6 Historical Records Review Summary

The following historical use summary has been compiled from a review of Sanborn Fire Insurance Maps, aerial photographs, topographic maps, city directories, and other historical records referenced in this section.

The earliest identified development of the Subject Property was as a railway turntable and residential buildings circa 1885. The railway turntable attached to the rail line running along the western edge of the Subject Property. The residential buildings were developed along the Connecticut River to the southwest.

In approximately 1906, the Subject Property was developed as a hardware store with multiple coal storage sheds. One residential building remained along Bridge St. Multiple rail lines appear to terminate on the Subject Property and were likely used for loading and unloading coal.

Between 1962 and 1971, the buildings on the Subject Property were demolished and the Subject property remained vacant until use as a parking lot began sometime before 1987. The Subject Property has continued to be used as a parking lot.

A paper mill is noted to have formerly adjoined the Subject Property to the north.

## 5.3 Standard Environmental Records Review

A review of standard regulatory databases maintained by federal, state, and tribal offices was completed through EDR. The databases were searched for properties with reported environmental conditions located within approximate minimum search distances as specified by the ASTM Standard Practice. As a part of this regulatory review, other non-ASTM standard database listings reported by EDR may have also been evaluated. In these cases, this section includes a supplemental discussion of any findings and our opinion as it relates to the identification of RECs. The detailed EDR Radius report, including the mapping of results and limitations of the search criteria, is contained in **Appendix I**.

The databases use geocoded information to identify the coordinates of the properties or to check the street addresses of practically reviewable non-geocoded orphan properties located within the same zip code. The EDR report defines acronyms that are not explicitly defined in this discussion, lists the names of all of the databases that were searched, the date information was last updated by EDR, and the date information was last updated by the original source.

Plotted locations of all database listings are not always accurate. For listings that are suspected to be inaccurate, Weston & Sampson uses the best available data when evaluating listing locations.

The table below summarizes the number of properties identified for each database. Available records for each of the identified listings were reviewed to assess the potential to impact the Subject Property. In general, releases with sources that are proximate to, and hydraulically upgradient of, the Subject Property have the greatest potential to impact it. Weston & Sampson reviewed the location of each listing to determine if it met these criteria. If one or more of the following conditions were met, the database listing may have been excluded from further consideration:

- Hydrogeologically isolated from the Subject Property (e.g., opposite bank of a river);
- At such distance that migration of contaminants to the Subject Property is unlikely (i.e. greater than 0.25-mile upgradient for hazardous substance sites and greater than 500 feet for petroleum sites);  
or
- Groundwater flow from the listed property is away from the Subject Property.

Those listings that were not excluded were evaluated in more detail to assess if they pose a threat. For these listings, summary tables are provided that include Weston & Sampson's opinion as to whether the Subject Property is likely to be impacted. References to Vermont Department of Environmental Conservation (VTDEC) reports that were reviewed are included in Section 12.0.

The Subject Property was not identified in any databases searched by EDR.

Several database listings associated with nearby and adjoining properties were identified as requiring further review. These listings are discussed in the detail summary tables below. No other listings, including unmapped 'orphan' listings, were identified by Weston & Sampson as likely to have current or former releases with the potential to migrate to the Subject Property.

Map Findings Summary								
Database	Target Property	Search Distance (Miles)	Listings <1/8-mile	Listings 1/8-1/4-mile	Listings 1/4-1/2-mile	Listings 1/2-1-mile	Listings >1-mile	Total Listings
NPL		1	0	0	0	0	NR	0
Proposed NPL		1	0	0	0	0	NR	0
NPL LIENS		1	0	0	0	0	NR	0
Delisted NPL		1	0	0	0	0	NR	0
FEDERAL FACILITY		0.5	0	0	0	NR	NR	0
SEMS		0.5	0	0	0	NR	NR	0
SEMS-ARCHIVE		0.5	0	0	0	NR	NR	0
CORRACTS		1	0	0	0	0	NR	0
RCRA-TSDF		0.5	0	0	0	NR	NR	0
RCRA-LQG		0.25	0	0	NR	NR	NR	0
RCRA-SQG		0.25	0	0	NR	NR	NR	0
RCRA-VSQG		0.25	2	2	NR	NR	NR	4
LUCIS		0.5	0	0	0	NR	NR	0
US ENG CONTROLS		0.5	0	0	0	NR	NR	0
US INST CONTROLS		0.5	0	0	0	NR	NR	0
ERNS		TP	NR	NR	NR	NR	NR	0
US BROWNFIELDS		0.5	8	3	4	NR	NR	15
LUCIS		0.5	0	0	0	NR	NR	0
FEMA UST		0.25	0	0	NR	NR	NR	0
RCRA NonGen / NLR		0.25	6	4	NR	NR	NR	10
PFAS RCRA MANIFEST		0.25	1	0	NR	NR	NR	1
EDR Hist Auto		0.125	3	NR	NR	NR	NR	3
VT MANIFEST		0.25	2	4	NR	NR	NR	6
VT LUST		0.5	3	2	8	NR	NR	13
NH UST		0.25	0	1	NR	NR	NR	1
VT ENG CONTROLS		0.5	0	0	0	NR	NR	0
VT LAST		0.5	0	1	1	NR	NR	2
NY MANIFEST		0.25	1	1	NR	NR	NR	2
VT SHWS		1	11	7	5	2	NR	25
VT VAPOR		0.5	0	1	0	NR	NR	1
NH SHWS		1	0	0	0	1	NR	1
VT DRYCLEANERS		0.25	4	2	NR	NR	NR	6
VT BROWNFIELDS		0.5	5	4	3	NR	NR	12
VT HW GEN		0.25	2	2	NR	NR	NR	4
VT INST CONTROL		0.5	1	1	0	NR	NR	2

Database	Target Property	Search Distance (Miles)	Listings <1/8-mile	Listings 1/8-1/4-mile	Listings 1/4-1/2-mile	Listings 1/2-1-mile	Listings >1-mile	Total Listings
NH AST		0.25	0	1	NR	NR	NR	1
VT SWF/LF		0.5	0	0	0	NR	NR	0
VT AST		0.25	2	0	NR	NR	NR	2
VT UST		0.25	13	8	NR	NR	NR	21
INDIAN LUST		0.5	0	0	0	NR	NR	0
INDIAN UST		0.25	0	0	NR	NR	NR	0
INDIAN VCP		0.5	0	0	0	NR	NR	0

**Subject Property**

<b>Site Name</b>	AXSYS TECHNOLOGIES
<b>Databases</b>	RCRA NonGen / NLR, FINDS, ECHO
<b>Address</b>	33 BRIDGE ST
<b>Distance (ft.)</b>	89
<b>Direction</b>	East-Southeast
<b>Elevation</b>	Higher
<b>Comments</b>	This property is identified in the RCRA NonGen database and it is noted as verified not a generator of hazardous waste. It is unlikely to have impacted environmental media at the Subject Property.

<b>Site Name</b>	TOWN OF ROCKINGHAM, BELLOWS FALLS AREA DEVELOPMENT CORP
<b>Databases</b>	PFAS RCRA MANIFEST
<b>Address</b>	21 ISLAND STREET
<b>Distance (ft.)</b>	180
<b>Direction</b>	North
<b>Elevation</b>	Higher
<b>Comments</b>	<p>This listing pertains to a PFAS RCRA manifest under EPA ID: VTP000015638 which is associated with the Former Robertson Paper Mill. The manifest is associated with drummed groundwater contaminated with AFFF (PFAS containing) that appears to have been purged from a monitoring well.</p> <p>It is reasonable to assume that a broad geographic area is impacted given the nature of PFAS contamination, especially given this location's proximity to the Subject Property. PFAS compounds are not currently considered hazardous substances under CERCLA. Despite this, potential PFAS contamination is considered a Business Environmental Risk and should be considered during the proposed redevelopment of the Subject Property.</p> <p>Note: other environmental considerations related to this location are discussed in the following table as well.</p>

<b>Site Name</b>	ROBERTSON PAPER MILL
<b>Databases</b>	BROWNFIELDS, SHWS, NPDES, RCRA NonGen / NLR, PA MANIFEST, FINDS, US BROWNFIELDS
<b>Address</b>	21 ISLAND STREET
<b>Distance (ft.)</b>	180
<b>Direction</b>	North
<b>Elevation</b>	Higher
<b>Comments</b>	<p>SMS Site # 20134394: This Site was historically used for paper manufacturing, paper conversion, and as a machine shop. The Site was impacted with lead, arsenic, asbestos, petroleum, and PAHs. The building was demolished in 2019 as part of a Brownfields Economic Revitalization Alliance (BERA) project. Asbestos was removed, contaminated soil was excavated, and 18-inches of clean soil was placed to contain remaining contaminated soil.</p> <p>Light Non-aqueous Phase Liquid (LNAPL) was detected in Site monitoring wells from two</p>

<b>Comments</b>	<p>separate sources. In bedrock supply well WS-1, LNAPL was attributed to a release of No. 6 Fuel Oil from former ASTs within the tank house. In monitoring wells along Island Street (MW-4, SH-4, and MW-5) there is LNAPL with TPH fingerprints more consistent with hydraulic or transmission oil and it is believed to be not associated with the release of No. 6 fuel oil. Groundwater flow on the Site is to the southwest towards the Subject Property.</p> <p>Given the likely flow of groundwater towards the Subject Property and unknown nature and extent of LNAPL, Weston &amp; Sampson is of the opinion that conditions at this listing are likely to impact the subsurface conditions on the Subject Property.</p>
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<b>Site Name</b>	BELLOWS FALLS WAYPOINT
<b>Databases</b>	US BROWNFIELDS, SHWS, BROWNFIELDS
<b>Address</b>	DEPOT STREET
<b>Distance (ft.)</b>	186
<b>Direction</b>	Northwest
<b>Elevation</b>	Lower
<b>Comments</b>	<p>SMS Site # 2000-2836: Phase I and II Environmental Site Assessments (ESA) were conducted in 2000 by Stone Environmental. Tetrachloroethene (PCE) was detected in concentrations exceeding the Vermont Groundwater Enforcement Standards (VGES) in one monitoring well (MW-2) during the Phase II ESA. No source was identified. PCE was not detected in monitoring wells closer to the Subject Property. An Additional Site investigation conducted by ATC Associates, Inc. (ATC) in 2001 identified low levels of PCE in soil and VGES exceedances in MW-2. VOCs were not detected in canal surface water and no source of PCE was identified. In 2005, the Site was closed with a Site Management Activity Completed (SMAC) designation.</p> <p>Weston &amp; Sampson is of the opinion that the nature and extent of PCE at the Bellows Falls Waypoint site was not adequately defined to rule out potential impacts to subsurface conditions on the Subject Property. □</p>

<b>Site Name</b>	ROSS' Garage
<b>Databases</b>	Financial Assurance, UST, EDR Hist Auto, SHWS
<b>Address</b>	30 BRIDGE STREET
<b>Distance (ft.)</b>	209
<b>Direction</b>	East-Northeast
<b>Elevation</b>	Higher
<b>Comments</b>	<p>SMS Site #95-1920 : In 1995, the following USTs were removed and replaced with a 12000-gallon UST for gasoline storage:</p> <ul style="list-style-type: none"> <li>-A 2500-gallon gasoline single-wall steel tank</li> <li>-A 1000-gallon No. 2 fuel oil single-wall steel tank</li> <li>-A 3000-gallon gasoline single-wall steel tank</li> <li>-A 4000-gallon gasoline single-wall steel tank</li> </ul> <p>The soil beneath the removed USTs was screened with a PID and volatile organic compounds were detected. This was determined to be a result of a release of gasoline to the subsurface. 30 yards of contaminated soil was stockpiled at the nearby Green Mountain Railroad property. No further investigation has occurred on the Site. Multiple requests for an initial site investigation have been made by VTDEC.</p> <p>Due to the lack of Site closure, distance to Subject Property, and location upgradient of the Subject Property there is a risk of impacts to the Subject Property related to this database listing. □</p>

<b>Site Name</b>	BELLOWS FALLS TRAIN STATION
<b>Databases</b>	SHWS, FINDS, US BROWNFIELDS
<b>Address</b>	50 DEPOT STREET
<b>Distance (ft.)</b>	254
<b>Direction</b>	Northwest

<b>Elevation</b>	Lower
<b>Comments</b>	SMS Site #2022-5159: Listing is in regards to lead and asbestos in building materials. This location was historically used as a train station and office spaces. It is unlikely that this listing has impacted subsurface conditions on the Subject Property.

<b>Site Name</b>	BELLOWS FALLS STATION
<b>Databases</b>	UST
<b>Address</b>	BRIDGE STREET BELLOWS FALLS
<b>Distance (ft.)</b>	280
<b>Direction</b>	Southeast
<b>Elevation</b>	Lower
<b>Comments</b>	<p>This listing is identified in the underground storage tank (UST) database containing a 1000 gallon gasoline UST which was pulled in 1993. There are no known releases associated with this UST. Given the lack of release history, it is unlikely that this listing has impacted subsurface conditions on the Subject Property.</p> <p>NOTE: Although this listing is mapped 146 feet east of the Subject Property, it is actually approximately 280 feet southeast.</p>

<b>Site Name</b>	GMP BELLOWS FALLS TRANSFORMER
<b>Databases</b>	SHWS
<b>Address</b>	47 BRIDGE ST
<b>Distance (ft.)</b>	286
<b>Direction</b>	East-Northeast
<b>Elevation</b>	Higher
<b>Comments</b>	SMS Site #2009-3923 : Arsenic, Lead, PAHs, and TPH encountered in shallow soil during a field investigation. Site is used for the storage of transformers and utility poles. No groundwater impacts have been identified. Due to the lack of recorded impacts to groundwater, and the nature of the contamination detected to date, is unlikely that this listing has impacted subsurface conditions on the Subject Property.

<b>Site Name</b>	GREEN MOUNTAIN RAILROAD CORP
<b>Databases</b>	FINDS, RCRA NonGen / NLR
<b>Address</b>	8 DEPOT ST
<b>Distance (ft.)</b>	378
<b>Direction</b>	West-Northwest
<b>Elevation</b>	Lower
<b>Comments</b>	This property is identified in the RCRA NonGen database and it is noted as verified not a generator of hazardous waste.

<b>Site Name</b>	COTA AND COTA, INC.
<b>Databases</b>	UST
<b>Address</b>	BRIDGE STREET BELLOWS FALLS
<b>Distance (ft.)</b>	394
<b>Direction</b>	South-Southwest
<b>Elevation</b>	Higher
<b>Comments</b>	<p>This listing pertains to the removal of two USTs. A 8500-gallon steel tank storing gasoline was removed in 1994, and a 2000-gallon steel tank storing diesel was removed in 1995. No evidence of a release was noted.</p> <p>NOTE: While this listing was listed on the other side of the Connecticut River to the south-southwest. It is actually located at 56 Bridge Street to the east. Another listing at this address is discussed in the table below.</p>

<b>Site Name</b>	COTA & COTA - BELLOWS FALLS BULK PLANT
<b>Databases</b>	AST, TIER 2
<b>Address</b>	56 BRIDGE STREET
<b>Distance (ft.)</b>	402
<b>Direction</b>	East-Northeast
<b>Elevation</b>	Higher
<b>Comments</b>	<p>This listing pertains to the current operation of at least ten (10) above ground storage tanks (ASTs) used for the storage of diesel fuel, gasoline, and Number 2 fuel oil. The size and location of these tanks is not listed. Based on the distance from the Subject Property and lack of information regarding releases it is unlikely to have impacted environmental media at the Subject Property.</p> <p>NOTE: While this listing was listed on the other side of the Connecticut River to the south-southwest, similarly to the above listing it is actually located at 56 Bridge Street to the east. Another listing at this address is discussed in the table below.</p>

<b>Site Name</b>	COTA MAINTENANCE
<b>Databases</b>	Financial Assurance, UST
<b>Address</b>	56 BRIDGE STREET BELLOWS FALLS
<b>Distance (ft.)</b>	402
<b>Direction</b>	East-Northeast
<b>Elevation</b>	Higher
<b>Comments</b>	<p>This listing pertains to the presence of two 10000-gallon polyethylene jacketed steel USTs. Both contain spill containment buckets and liquid overflow alarms. Gasoline is stored in one of the tanks and diesel fuel in the other. Based on the distance from the Subject Property and lack of information regarding releases it is unlikely to have impacted environmental media at the Subject Property.</p>

## 5.4 Local Records

Weston & Sampson made Freedom of Information Act (FOIA) requests with various Rockingham offices including the Fire Department, Health Services Department, and the Inspectional Services Department and reviewed Tax Assessors records. FOIA requests were made on January 10. Pertinent findings are summarized in the following subsections. Copies of documents reviewed are provided in **Appendix J**.

### 5.4.1 Tax Assessor

Weston & Sampson performed an online file review with the Town of Rockingham Lister's Office on January 11, 2024. No pertinent information was identified regarding potential RECs. The current use of the Subject Property was identified as a parking lot. Copies of any records obtained are included in **Appendix J**.

### 5.4.2 Fire Department

Weston & Sampson performed a file review at the Town of Rockingham Fire Department. The fire department was asked to provide relevant information concerning the current and/or former presence of USTs at the Subject Property. No pertinent information concerning the current or former presence of USTs was identified.

### 5.4.3 Health Services Department

Weston & Sampson performed a file review at the Town of Rockingham Public Health Office. The Public Health Office was asked to provide relevant information concerning the storage and use of petroleum and/or hazardous substances. No information of this nature was obtained during the file review.

#### 5.4.4 Inspectional Services Department

Weston & Sampson performed a file review at the Town of Rockingham Planning/Zoning Department on January 11, 2024. The Planning/Zoning Department was asked to provide relevant information concerning the storage and use of petroleum and/or hazardous substances. The location of two underground storage tanks on Bridge Street were identified (not on the Subject Property). Copies of the records are included in **Appendix J**.

#### 5.4.5 Electric Utility

Weston & Sampson personnel observed one (1) pole-mounted transformer approximately located on the Subject Property boundary and serving adjacent properties. This transformer appeared to be relatively new and in good condition, with a "No PCBs" sticker visible. Evidence of a release from these transformers was not observed. Finally, records of releases from these transformer would have been identified in the Vermont Hazardous Sites database.

### 5.5 Other Environmental Records

Weston & Sampson may consult other environmental records, if necessary, to develop the regulatory history of the Subject Property and surrounding area. In some cases, other records are reviewed to understand the specific nature of certain database listings. For this Phase I ESA, Weston & Sampson reviewed the following records:

The 2016 combined CFAI/CAP was reviewed with regards to the direction of groundwater flow and presence of LNAPL from the Former Robertson Paper Site.

Copies of environmental records reviewed by Weston & Sampson are included in **Appendix K**.

## 6.0 INTERVIEWS

To the extent practicable, Weston & Sampson interviews individuals with knowledge of current and past operations at the Subject Property. For this Phase I ESA, Weston & Sampson conducted interviews with local government officials. Interviews were performed via a written questionnaire. Questions were focused on information that would lead to the identification of RECs in connection with the Subject Property. Pertinent information garnered during the interviews is summarized in the following subsections.

### 6.1 Current Owner

A representative of the Town was interviewed regarding the current and former use of the Subject Property. No findings pertinent to the identification of RECs were reported.

### 6.2 Key Site Manager

Gary Fox, a representative of the Town, was also identified as the Key Site Manager. Pertinent interview responses are summarized in **Section 6.1**.

### 6.3 Current Occupants

The Subject Property is developed with a parking lot and has no occupants.

### 6.4 Current Operators

The Town of Rockingham currently operates the Subject Property. Pertinent responses are summarized in **Section 6.1**.

### 6.5 Past Owners

Past owners were not interviewed during this Phase I ESA because they were not identified by the current Owner.

### 6.6 Local Government Officials

Weston & Sampson interviewed no local government officials because Rockingham department officials were deemed not likely to have a direct working knowledge of past operations at the Subject Property. For this reason, Freedom of Information Action (FOIA) requests OR calls were made to several Rockingham departments. The intent of these file reviews is to procure information that might aid in the identification of RECs that might exist on the Site. Pertinent information garnered from the local file reviews is summarized in Section 5.4.

### 6.7 Other Individuals

Sarah Bartlett from VTDEC was interviewed on February 13 with regards to the Former Robertson Paper Mill site nearby the Subject Property.

## 7.0 OTHER ENVIRONMENTAL CONSIDERATIONS

This section is reserved for a discussion of asbestos-containing materials (ACM), lead-based paint (LBP), and polychlorinated biphenyls (PCBs) in building materials. The project scope did not include the identification of these building materials.

Releases of emerging contaminants or other substances not defined as hazardous substances under CERCLA (e.g., per- and polyfluoroalkyl substances or PFAS) are discussed throughout this report and in Sections 9 and 10. Groundwater contaminated with PFAS compounds was identified in close proximity to the Subject Property. Potential PFAS contamination in the vicinity of the Subject Property is considered a Business Environmental Risk and should be considered during the proposed redevelopment of the Subject Property.

## 8.0 DATA GAPS

A data gap is a lack of, or inability to obtain, required information despite good faith efforts by the Environmental Professional. Significant data gaps are data gaps that affect the ability of the Environmental Professional to identify recognized environmental conditions. The following data gaps were identified:

- Data failure was encountered during the historical use source review related to the 5-year interval requirement.
- The historical use review did not identify Subject Property use back to the date of the original development of the Site.
- Past owners and occupants were not interviewed during this Phase I ESA.

It is Weston & Sampson's opinion that these data gaps do not represent significant data gaps because other information was able to be developed to suggest the nature of original Subject Property use and to define the continuity of use.

## 9.0 FINDINGS AND OPINIONS

A summary of relevant environmental findings, along with Weston & Sampson's professional opinions, are provided below:

- The earliest identified development of the Subject Property was as a railway turntable and residential buildings circa 1885. The railway turntable attached to the rail line running along the western edge of the Subject Property. The residential buildings were developed along the Connecticut River to the southwest.
- In approximately 1906, the Subject Property was developed as a hardware store with multiple coal storage sheds. One residential building was present along Bridge Street. Multiple rail lines appear to terminate on the Subject Property and were likely used for loading and unloading. The former storage of coal on the Subject Property occurred during a timeframe when waste management practices were not equivalent to current practices and represents a REC.
- Between 1962 and 1971, the buildings on the Subject Property were demolished and the Subject property remained vacant until use as a parking lot began sometime before 1987. The Subject Property has continued to be used as a parking lot.
- As noted above, a rail right-of-way has existed on or adjoining this parcel since at least 1885 (the earliest available record). Additionally, a railroad turn-table was located on the Subject Property. Historical railroad operations involved the use of chemicals such as metals, pesticides (including lead arsenate), and constituents of oil or fuel (petroleum products). This historical high-risk use has the potential to impact subsurface media at the Subject Property and represents a REC.
- A degraded 55-gallon drum as well as an empty gas container were observed during field reconnaissance. The former contents of these containers are not known. Petroleum and/or hazardous materials formerly stored in these containers is likely to have impacted subsurface conditions at the Subject Property and represents a REC.
- The area around the Subject Property has had a long history of diverse industrial uses including: paper mills, auto repair, machine shops, petroleum storage, a power plant, and railroad operations. Cumulative former uses occurred during a timeframe when waste management practices were not equivalent to current practices and have likely led to undocumented releases of hazardous substances and/or petroleum. Any releases of this nature would have likely impacted environmental media at the Subject Property. For this reason, it is our opinion that the hazardous substance and/or petroleum impacts to the Subject Property from the long history of area industrial use represents a REC.
- The former Robertson Paper Company is also the recorded location of a measurable amount of LNAPL. Notably, LNAPL has been recorded less than 200 feet upgradient from the Subject Property. It is not known if LNAPL or associated vapors are present on the Subject Property. This represents a REC.
- The nature and extent of tetrachloroethylene (PCE) at the former Bellows Falls Waypoint site, adjacent the Subject Property to the west, has not been adequately defined to rule out potential impacts to subsurface conditions on the Subject Property and represents a REC.
- While no structures are presently located on the Subject Property, the potential for vapor intrusion related to the above-discussed LNAPL plume should be considered during redevelopment.
- The Subject Property is within an area designated by the Vermont Department of Environmental Conservation (VTDEC) as an Urban Background Area. Subsurface soil and fill material may be impacted by common urban contaminants such as arsenic, lead, and polycyclic aromatic hydrocarbons (PAHs). The likely presence of these common urban contaminants in soil is considered a REC.

- Waste manifests associated with the former Robertson Paper Company property suggests that groundwater in the vicinity of the Subject Property is impacted with per- and polyfluoroalkyl substances (PFAS). PFAS compounds are not currently considered hazardous substances under CERCLA. Despite this, potential PFAS contamination is considered a Business Environmental Risk and should be considered during the proposed redevelopment of the Subject Property.

## 10.0 CONCLUSIONS

We have performed a Phase I Environmental Site Assessment in conformance with the scope and limitations of the ASTM Standard Practice of the property located at 0 Bridge Street (Rockingham, Vermont. Any exceptions to, deletions from, this practice are described in Section 1.0. The assessment has revealed no evidence of recognized environmental conditions in connection with the Subject Property except for the following:

- The former storage of coal on the Subject Property represents a REC.
- The rail right-of-way and historical turntable on and adjoining the Subject Property represents a REC.
- The potential release associated with the degraded 55-gallon drum and gas container observed during field reconnaissance represents a REC.
- Potential releases due to the long history of industrial use in the area are likely to have impacted environmental media at the Site and are considered a REC.
- The nearby LNAPL plume represents a REC.
- The nearby release of tetrachloroethylene represents a REC.
- The potential presence of fill from unknown sources represents a REC

In addition to the RECs listed above, Weston & Sampson identified the following conditions as part of this Phase I ESA:

- PFAS-impacted groundwater in the vicinity of the Subject Property represents a BER.

**11.0 SIGNATURES OF THE ENVIRONMENTAL PROFESSIONAL**

This ESA was overseen by [a] Qualified Environmental Professional[s] as defined in the ASTM Standard Practice, CERCLA, and the EPA AAI Final Rule. Qualifications for the Environmental Professional[s] are included in Appendix L.

**Environmental Professional Statement**

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

**Authored by:**

Lee Rosberg  
Senior Project Manager

**Reviewed by:**

Steve LaRosa  
Senior Technical Leader

## 12.0 REFERENCES

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- ATC Associates, Inc. 2001. Additional Site Investigation, Island Redevelopment Property. May 21.
- Cota & Cota, Inc. 1986. Vermont Notification for Underground Storage Tanks. May 28.
- Environmental Data Resources, Inc., The EDR Radius Map Report with GeoCheck, Historical Topographic Map Report, Aerial Photo Decade Package Report, City Directory Image Report, and Historical Fire Insurance Maps, Inquiry Number 7537663.2s dated January 09, 2024.
- Griffin International, Inc. 1995. Inspection and Closure of 4 USTs. November 6.
- New England Power Company. 1986. Vermont Notification For Underground Storage Tanks. April 23.
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- Vermont Department of Environmental Conservation. Environmental Research Tool (ERT). Retrieved from <https://anrweb.vt.gov/DEC/ERT/Default.aspx>, January 2024.
- Vermont Department of Environmental Conservation. 1996. Petroleum Contamination at Ross's Garage. January 26.
- Vermont Department of Environmental Conservation. 2005. Site Management Activities Completed, Waypoint Center. March 10.

# Figures

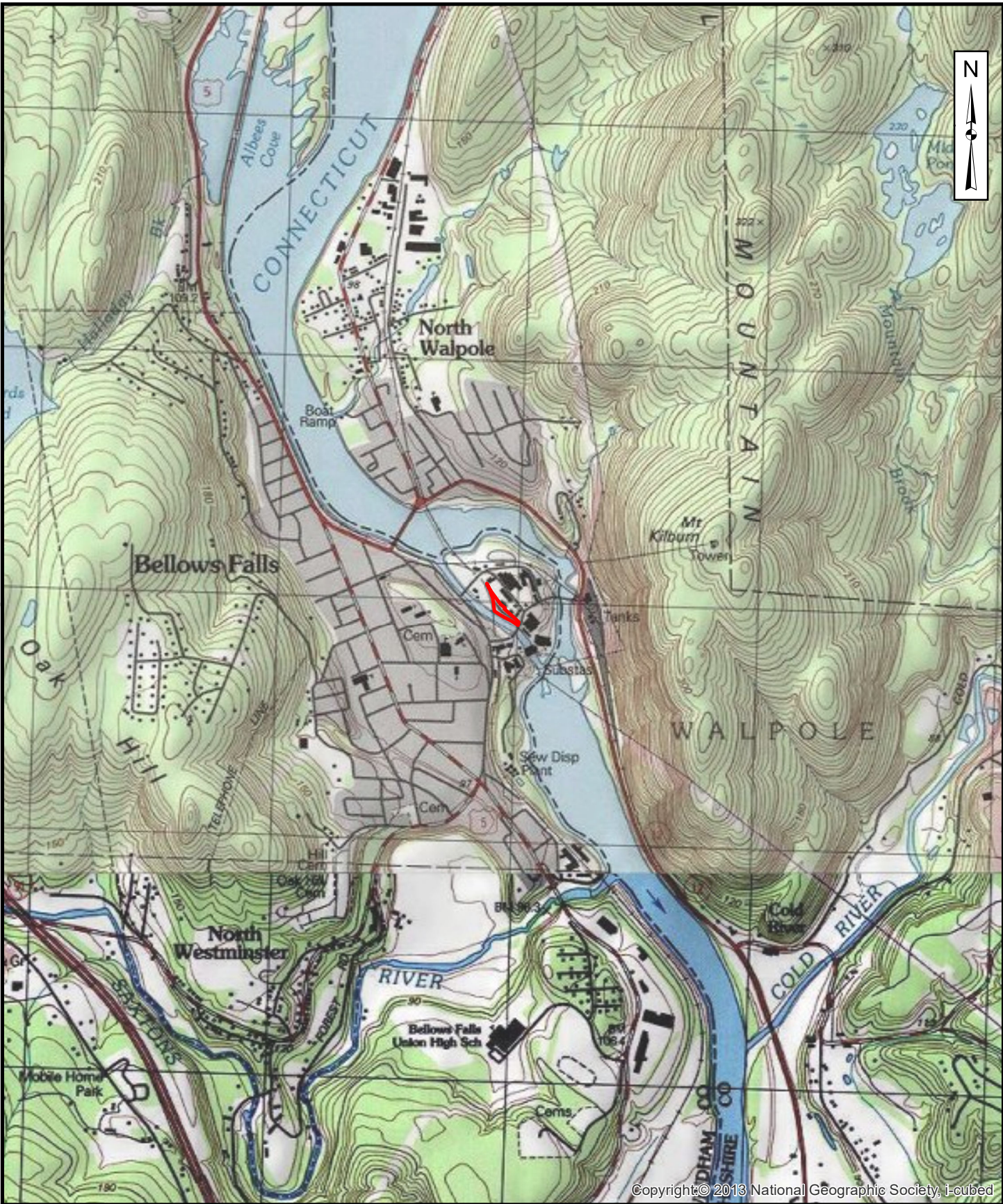
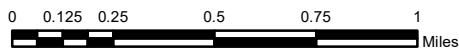


FIGURE 1  
 0 BRIDGE STREET  
 BELLOWS FALLS (ROCKINGHAM), VERMONT

### LOCUS MAP

**LEGEND**

 Subject Property





Service Layer Credits: Source: Esri, DigitalGlobe, GeoEye, Earthstar Geographics, CNES/Airbus DS, USDA, USGS, AeroGRID, IGN, and the GIS User Community

FIGURE 2  
 0 BRIDGE STREET  
 BELLOWS FALLS (ROCKINGHAM), VERMONT

**SITE PLAN**

**LEGEND**

Subject Property



**Appendix A:**  
**Scope of Services**

December 21, 2023

Susan Westa  
Windham Regional Commission  
139 Main Street, Suite 505  
Brattleboro, VT 05301

Approved 12/22/2023  
Susan Westa  
WRC, Associate Director

Re: Revised Proposal: 0 Bridge Street Phase I ESA – Bellows Falls, Vermont

Dear Ms. Westa:

Weston & Sampson is pleased to submit this revised Scope of Services and Cost Estimate for a Phase I Environmental Assessment (ESA) at 0 Bridge Street, Bellows Falls, Vermont (the Subject Property). The Scope of Services has been revised based on your comments and questions received via email on December 20, 2023.

We understand that the Town of Rockingham owns the Subject Property, which is currently developed as a parking lot, and is considering a commercial and residential mix-use redevelopment. Environmental assessment is necessary to understand potential environmental conditions related to historical rail operations at the Subject Property and current and historical industrial operations at nearby properties including paper manufacturing, an electrical substation, and automotive maintenance/gasoline filling.

The Phase I ESA will be conducted in accordance with the EPA All Appropriate Inquiries (AAI) and ASTM E1527-21 standard. The Phase I ESA will identify Recognized Environmental Conditions (RECs) at the Site and evaluate the potential for a release of oil and/or hazardous materials (OHM) to the environment as well as recommend, if warranted, additional environmental investigations.

**Scope of Services:**

A detailed scope of services specifying the work to be performed and your responsibilities is included in **Attachment A**. We understand that the Town of Rockingham will be fulfilling Phase I ESA User Responsibilities listed in **Attachment A**. The following general scope of services will be performed for this project:

- Task 1: Historical, Environmental Site Review, Interviews
- Task 2: Database Review
- Task 3: Site Inspection/Reconnaissance
- Task 4: Questionnaires
- Task 5: Phase I ESA Report
- Task 6: Recommendations to Client regarding further investigations.

Please also refer to “User Responsibilities” in **Attachment A**. It is important for you to provide this required information for us to meet the ASTM and EPA standards.

**Cost Estimate and Schedule:**

Weston & Sampson’s fee for services under this proposal is \$ [REDACTED], invoiced to you on a time and expenses, not-to-exceed basis. We can the Phase I ESA Scope of Services described in this proposal within one month of executing a task order.

Please don’t hesitate to contact me at [Rosberg.lee@wseinc.com](mailto:Rosberg.lee@wseinc.com) with any additional comments or questions.

Sincerely,

WESTON & SAMPSON ENGINEERS, INC.



Lee Rosberg  
Senior Project Manager



Steven D. Shaw, PG  
Regional Manager

APPROVED BY: \_\_\_\_\_ DATE: \_\_\_\_\_

**Attachment A**  
**Weston & Sampson**  
**Phase I Environmental Site Assessment**  
**Scope of Work**

Phase I ESA User Responsibilities

The following user responsibilities must be completed for the work to be considered compliant:

1. Reviewing title and judicial records for environmental liens, or activity and use limitations (AULs).
2. Provide any specialized knowledge or experience that is material to RECs associated with the Subject Property.
3. Provide any actual knowledge of any environmental liens or other encumbrances for the Subject Property.
4. Provide any reasons for a significantly lower purchase price if the Subject Property is involved in a transaction for purchase or sale.
5. Provide any commonly known or reasonably ascertainable information within the local community about the Subject Property.
6. Provide information to the environmental professional why the Phase I ESA is being conducted. If the user does not identify the purpose(s) of the Phase I ESAs, the environmental professional will assume the purpose is to qualify innocent landowner liability protection under CERCLA and will state this in the report.

We will provide you with a user questionnaire that will assist will completing these responsibilities. While you are responsible for reviewing title and judicial records (item #1 above), which typically falls to the responsibility of a title search company, Weston & Sampson can have this completed for an additional cost of \$600.

The following elements will be included in the proposed ASTM E 1527-21 compliant Phase I ESA:

Agency File Reviews and Historical Records Review

The purpose of the records review is to obtain and review reasonably ascertainable records that will help identify recognized environmental conditions in connection with the Subject Property. At a minimum the following standard state and federal environmental record sources will be reviewed and may be available from both government sources and/or third-party vendors specializing in record retrieval: Federal NPL Site List 1.0 mile; Federal CERCLIS List 0.5 mile; Federal RCRA TSD Facilities List 1.0 mile; Federal RCRA Generators List Subject Property and Adjoining Properties; Federal ERNS List Subject (site only); State Leaking UST Sites 0.5 miles; State Registered UST Sites (site and adjoining properties)

Other state agency files will be reviewed to determine the history of use and regulatory status of the Subject Property and of adjoining properties may have the potential to impact the Subject Property. Weston & Sampson may check additional state and local sources to supplement federal and state sources identified above.

Historical sources will be reviewed to ascertain the previous uses or occupancies of the Subject Property and surrounding area and to identify those uses or occupancies that are likely to have led to recognized environmental conditions in connection with the Subject Property. The historical records reviewed generally include at least three of the following (where available) sources:

- |                                     |   |
|-------------------------------------|---|
| ✓ Title Records                     | <input type="checkbox"/> Historical Fire Insurance Maps |
| ✓ Aerial Photographs                | <input type="checkbox"/> Fire Department Records        |
| ✓ USGS Topographic Maps             | <input type="checkbox"/> Historical Tax Records         |
| ✓ Historical City Directory Records | <input type="checkbox"/> Historical Topographic Maps    |
| ✓ Prior Env. Assessment Reports     |   |

Site Reconnaissance

The site reconnaissance will be performed to identify recognized environmental conditions in connection with the Subject Property. To accomplish this objective, visual and physical observations (i.e. noxious or foul odors) will be noted while observing the exterior of the Subject Property and all structures on the site. Observations will also be made in all accessible interior areas of any site structures.

Weston & Sampson will also note the current use(s) of the Subject Property during the site reconnaissance. Visual or physical indications of past uses of the Subject Property that were likely to involve the use, treatment, storage, disposal, or generation of hazardous substances or petroleum products will be described to the extent that this information is noted. Current of adjoining properties will also be described. The observable geologic, hydrogeologic, and topographic conditions on-site and surrounding the site will be described.

During the site reconnaissance, Weston & Sampson will note the presence and/or absence (where applicable) of the following important site conditions:

- |                  |                    |   |
|------------------|--------------------|---|
| ➤ Storage tanks  | ➤ Drains and sumps | ➤ Pits, ponds, lagoons                                      |
| ➤ Noxious Odors  | ➤ Pools of liquid  | ➤ Stressed vegetation                                       |
| ➤ Drums          | ➤ Solid waste      | ➤ Stained soil or pavement                                  |
| ➤ Septic systems | ➤ Monitor Wells    | ➤ Identified and/or<br>unidentified substance<br>containers |
| ➤ Wastewater     | ➤ Heating source   |   |

### Interviews

As required by ASTM E 1527-21, Weston & Sampson will conduct interviews with current and past owners and occupants and the individual identified as the Key Site Manager of the Site. The goal of these interviews will be to obtain information concerning the potential for recognized environmental conditions in connection with the site. As such, interviews will focus on obtaining information about current and/or past uses and conditions noted during the site reconnaissance. We will also ask questions to determine if prior environmental documents exist and if any environmental related threatened, pending, or past litigation, administrative actions, or notices of violation exist relevant to hazardous substances or petroleum products in, on, or from the Subject Property. Reasonable attempts will be made to interview the owners of the site, a representative any site occupants, and/or key site managers.

Interviews with local government officials will also be conducted to obtain information associated with potential RECs in connection with the Subject Property. Reasonable attempts will be made to interview a staff member of the following types of local government agencies: fire department, health agencies, and/or local/regional office of state agency having jurisdiction over hazardous waste disposal or other environmental matters in the area in which the Subject Property are located.

### Phase I ESA Report

Weston & Sampson's Phase I ESA report will document the observations made and work completed. The report will be devised such that we clearly detail our findings and opinions. Conclusions will focus on the likely presence or absence of recognized environmental conditions in connection with the site. The report will include the environmental professional's opinion of the potential impact of recognized generally follow the recommended format environmental conditions detailed in ASTM E 1527-21. If the assessment reveals no evidence of recognized environmental conditions, then a statement to this effect would be made in the report.

**Appendix B:**  
**Photograph Log**



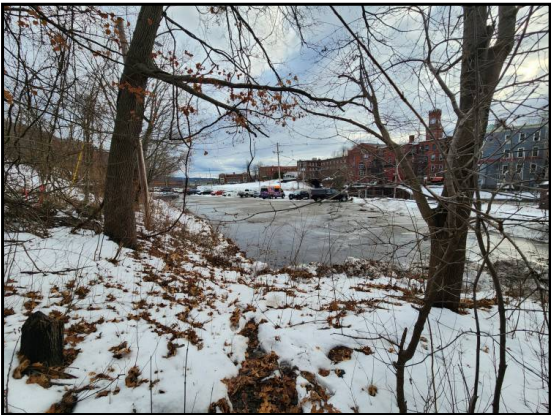
1: View of Subject Property facing southeast.



2: View of Subject Property facing north.



3: View of rail line adjacent to Subject Property, facing north.



4: View of subject property facing south.



5: View of entrance to Subject Property from Bridge St.



6: View of Subject Property from Bridge St., facing north.



7: View of Subject Property and adjacent buildings, facing southeast.



8: View of drum located on the eastern edge of the Subject Property.



9: View of the Former Robertson Paper Mill, facing north.



10: View of Napa Auto Parts, facing northwest.



11: View of monitoring well on Island Street, facing south.



12: View of adjoining commercial buildings from Bridge Street, facing northwest.

**Appendix C:**  
**Questionnaires / Checklists**

# Phase I ESA User Questionnaire

For the Subject Property:

0 Bridge Street, Bellows Falls, VT

To qualify for one of the *Landowner Liability Protections (LLPs)* offered by the Small Business Liability Relief and Brownfields Revitalization Act of 2001 (the "*Brownfields Amendments*"), the *user* must conduct the following inquiries required by 40 C.F.R. §§ 312.25, 312.28, 312.29, 312.30, and 312.31. These inquiries must also be conducted by EPA Brownfield Assessment and Characterization grantees. The *user* should provide the following information to the *environmental professional*. Failure to conduct these inquiries could result in a determination that "*all appropriate inquiries*" is not complete.

**(1.) Environmental liens that are filed or recorded against the *subject property* (40 C.F.R. § 312.25).**

Did a search of *land title records* (or judicial records where appropriate, see Note 1) identify any *environmental liens* filed or recorded against the *subject property* under federal, tribal, state, or local law?

YES  NO

Notes: \_\_\_\_\_

**(2.) Activity and use limitations (AULs) that are in place on the *subject property* or that have been filed or recorded against the *subject property*.**

Did a search of *land title records* (or judicial records where appropriate, see Note 1) identify any *AULs*, such as *engineering controls*, land use restrictions or *institutional controls* that are in place at the *subject property* and/or have been filed or recorded against the *subject property* under federal, tribal, state or local law?

YES  NO

Notes: \_\_\_\_\_

**(3.) Specialized knowledge or experience of the person seeking to qualify for the *LLP* (40 C.F.R. § 312.28).**

Do you have any specialized knowledge or experience related to the *subject property* or nearby *properties*? For example, are you involved in the same line of business as the current or former *occupants* of the *subject property* or an *adjoining property* so that you would have specialized knowledge of the chemicals and processes used by this type of business?

YES  NO

Notes: \_\_\_\_\_

**(4.) Relationship of the purchase price to the fair market value of the *subject property* if it were not contaminated (40 C.F.R. § 312.29).**

Does the purchase price being paid for this *subject property* reasonably reflect the fair market value of the *property*?

YES  NO  N/A

If you conclude that there is a difference, have you considered whether the lower purchase price is because contamination is known or believed to be present at the *subject property*?

YES  NO  N/A

Notes: \_\_\_\_\_

NOTE 1 - In certain jurisdictions, federal, tribal, state, or local statutes, or regulations specify that *environmental liens* and *AULs* be filed in judicial records rather than in *land title records*. In such cases judicial records shall be searched for *environmental liens* and *AULs*.

Phase I ESA User Questionnaire

For the Subject Property:

0 Bridge Street, Bellows Falls, VT

(5.) Commonly known or *reasonably ascertainable* information about the *subject property* (40 C.F.R. § 312.30).

Are you aware of commonly known or *reasonably ascertainable* information about the *subject property* that would help the *environmental professional* to identify conditions indicative of *releases* or threatened *releases*?

YES  NO

Notes: \_\_\_\_\_

Do you know the past uses of the *subject property*?

YES  NO

Notes: \_\_\_\_\_

Do you know of specific chemicals that are present or once were present at the *subject property*?

YES  NO

Notes: \_\_\_\_\_

Do you know of spills or other chemical *releases* that have taken place at the *subject property*?

YES  NO

Notes: \_\_\_\_\_

Do you know of any environmental cleanups that have taken place at the *subject property*?

YES  NO

Notes: \_\_\_\_\_

Phase I ESA User Questionnaire

For the Subject Property:

0 Bridge Street, Bellows Falls, VT

(6.) The degree of obviousness of the presence or likely presence of contamination at the *subject property*, and the ability to detect the contamination by appropriate investigation (40 C.F.R. § 312.31).

Based on your knowledge and experience related to the *subject property*, are there any *obvious* indicators that point to the presence or likely presence of *releases* at the *subject property*?


YES  NO

Notes: \_\_\_\_\_

Completed By:

Name: Gary Fox

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

*Development Director, Town of Rowley*  


Date: February 15, 2024



**ENVIRONMENTAL SITE RECONNAISSANCE QUESTIONNAIRE**  
 (to be completed by an owner's representative)

Site Name: 0 Bridge Street  
 Site Address: 0 Bridge Street, Bellows Falls, VT  
 Site Visit Date: January 10, 2024

What is the current and past use(s) of the subject property?

<b>Current</b>		<b>Past</b>	
Residential – Single Family	<input type="checkbox"/>	Residential – Single Family	<input type="checkbox"/>
Residential – Multi-Family	<input type="checkbox"/>	Residential – Multi-Family	<input type="checkbox"/>
Commercial	<input type="checkbox"/>	Commercial	<input checked="" type="checkbox"/>
Industrial/Manufacturing	<input type="checkbox"/>	Industrial/Manufacturing	<input type="checkbox"/>
Unimproved/Raw Land	<input checked="" type="checkbox"/>	Unimproved/Raw Land	<input type="checkbox"/>
Agriculture	<input type="checkbox"/>	Agriculture	<input type="checkbox"/>

To the best of your knowledge, what are the current and past uses of the adjoining properties?

<b>Adjoining Property</b>	<b>Current</b>		<b>Past</b>	
	Owner	Use	Owner	Use
North:	Sustainable Valley Group, Inc	Food Processing	VT Farm Machine	Manufacturing
South:	Great River Hydro, LLC	Hydro Power Generation	International Paper Co -	Manufacturing
East:	1) Town of Rockingham 2) Great River Hydro LLC 1) Visitor Center 2) Canal			
West:	1) 35 Chester Road LLC 2) BFADC 1) Auto parts, Auto Repair, Food shelf, congregat meals, 2)_ empty lot 3) Duncan Johnson 4) David Buckley 13 Art Studio & residence 4) lght manufacturing, ex - law offices and Elks			

<b>Question</b>	<b>Owner/Property Representative Response</b>		
Is the property used for an industrial use?	YES	XNO	UNK
Is any <i>adjoining</i> property used for an industrial use?	YES	XNO	UNK
Did you observe evidence or do you have any prior knowledge that the property has been used for an industrial use in the past?	YES	XNO	UNK
Did you observe evidence or do you have any prior knowledge that any <i>adjoining</i> property has been used for an industrial use in the past?	YES	XNO	UNK
Is the property used as a gasoline station, motor repair facility, commercial printing facility, dry cleaner, photo developing laboratory, junkyard or landfill, or as a waste treatment, storage, disposal, processing, or recycling facility (if applicable, identify which)?	YES	XNO	UNK

Is any *adjoining* property used as a gasoline station, motor repair facility, commercial printing facility, dry cleaner, photo developing laboratory, junkyard or landfill, or as a waste treatment, storage, disposal, processing, or recycling facility (if applicable, identify which)?

YES     NO    UNK

Did you observe evidence or do you have any prior knowledge that the property has been used as a gasoline station, motor repair facility, commercial printing facility, dry cleaner, photo developing laboratory, junkyard or landfill, or as a waste treatment, storage, disposal, processing, or recycling facility (if applicable, identify which)?

YES     NO    UNK

Did you observe evidence or do you have any prior knowledge that any *adjoining* property has been used as a gasoline station, motor repair facility, commercial printing facility, dry cleaner, photo developing laboratory, junkyard or landfill, or as a waste treatment, storage, disposal, processing, or recycling facility (if applicable, identify which)?

YES     NO    UNK

Are there currently any damaged or discarded automotive or industrial batteries, pesticides, paints, or other chemicals in individual containers of >5 gallons (19 Q) in volume or 50 gallons (190 Q) in the aggregate, stored on or used at the property or at the facility?

YES     NO    UNK

Did you observe evidence or do you have any prior knowledge that there have previously been any damaged or discarded automotive or industrial batteries, or pesticides, paints, or other chemicals in individual containers of >5 gallons (19 L) in volume or 50 gallons (19 L) in the aggregate, stored on or used at the property or at the facility?

YES     NO    UNK

Are there currently any industrial drums (typically 55 gallons (208 Q)) or sacks of chemicals located on the property or at the facility?

YES     NO    UNK

Did you observe evidence or do you have any prior knowledge that there have previously been any industrial drums (typically 55 gallons (208 L)) or sacks of chemicals located on the property or at the facility?

YES     NO    UNK

Did you observe evidence or do you have any prior knowledge that fill dirt has been brought onto the property that originated from a contaminated site?

YES     NO    UNK

Did you observe evidence or do you have any prior knowledge that fill dirt has been brought onto the property that is of an unknown origin?      YES     NO      UNK

Are there currently any pits, ponds, or lagoons located on the property in connection with waste treatment or waste disposal?      YES     NO      UNK

Did you observe evidence or do you have any prior knowledge that there have previously been any pits, ponds, or lagoons located on the property in connection with waste treatment or waste disposal?      YES     NO      UNK

Is there currently any stained soil on the Property?      YES     NO      UNK

Did you observe evidence or do you have any prior knowledge that there has previously been any stained soil on the property?      YES     NO      UNK

Are there currently any registered or unregistered storage tanks (above or underground) located on the property?      YES     NO      UNK

Did you observe evidence or do you have any prior knowledge that there have previously been any registered or unregistered storage tanks (above or underground) located on the property?      YES     NO      UNK

Are there currently any vent pipes, fill pipes, or access ways indicating a fill pipe protruding from or adjacent to any structure located on the property?      YES     NO      UNK

Did you observe evidence or do you have any prior knowledge that there have previously been any vent pipes, fill pipes, or access ways indicating a fill pipe protruding from the ground on the property or adjacent to any structure located on the property?      YES     NO      UNK

Is there currently evidence of leaks, spills, or staining by substances other than water, or foul odor, associated with any flooring, drains, walls, ceilings, or exposed grounds on the property?      YES     NO      UNK

Did you observe evidence or do you have any prior knowledge that there have previously been any leaks, spills, or staining by substances other than water, or foul odors, associated with any flooring, drains, walls, ceilings, or exposed grounds on the property?      YES     NO      UNK

If the property is served by a private well or non-public water system, is there evidence or do you have any prior knowledge that contaminants have been identified in the well or system that exceeded guidelines applicable to the water system?      YES    NO    UNK

If the property is served by a private well or non-public water system, is there evidence or do you have prior knowledge that the well has been designated as contaminated by any government environmental/health agency?      YES    NO    UNK

Does the owner or occupant of the property have any knowledge of environmental liens or governmental notification related to past or recurrent violations of environmental laws with respect to the property or any facility located on the property?      YES    NO    UNK

Has the owner or occupant of the property been informed of the past existence of hazardous substances or petroleum products with respect to the property or any facility located on the property?      YES    NO    UNK

Has the owner or occupant of the facility been informed of the current existence of hazardous substance or petroleum products with respect to the property or any facility located on the property?      YES    NO    UNK

Has the owner or occupant of the property been informed of the past existence of environmental violations with respect to the property or any facility located on the property?      YES    NO    UNK

Has the owner or occupant of the property been informed of the current existence of environmental violations with respect to the property or any facility located on the property?      YES    NO    UNK

Does the owner or occupant of the property have any knowledge of any environmental site assessment of the property or facility that indicated the presence of hazardous substances or petroleum products on, or contamination of, the property, or recommended further assessment of the property?      YES    NO    UNK

Does the owner or occupant of the property know of any past, threatened, or pending lawsuits or administrative proceedings concerning a release or threatened release of any hazardous substance or petroleum products involving the property by any owner or occupant of the property?      YES    NO    UNK

Does the property discharge wastewater (not including sanitary waste or stormwater) onto or adjacent to the property and/or into a stormwater system?      YES    NO    UNK

Does the property discharge wastewater (not including sanitary waste or stormwater) onto or adjacent to the property and/or into a sanitary sewer system? YES X NO UNK

Did you observe evidence or do you have any prior knowledge that any hazardous substances or petroleum products, unidentified waste materials, tires, automotive or industrial batteries, or any other waste materials have been dumped above grade, buried, and/or burned on the property? YES X NO UNK

Is there a transformer, capacitor, or any hydraulic equipment for which there are any records indicating the presence of PCBs? YES X NO UNK

The Owner Questionnaire was completed by:

Name: Gary Fox  
Title: Development Director  
Firm: Town of Rockingham

Address: 7 Square , Bellows Falls, VT 05101  
Phone Number: (802) 376-5425  
Date: January 29, 2024



**Appendix D:**  
**User-Provided Documents**

**No documents have been associated  
with this appendix.**

## **Appendix E:**

# **Sanborn Fire Insurance Maps**

0 Bridge Street

0 Bridge Street

Bellows Falls, VT 05101

Inquiry Number: 7537663.3

January 09, 2024

## Certified Sanborn® Map Report



6 Armstrong Road, 4th floor  
Shelton, CT 06484  
Toll Free: 800.352.0050  
[www.edrnet.com](http://www.edrnet.com)

# Certified Sanborn® Map Report

01/09/24

**Site Name:**

0 Bridge Street  
0 Bridge Street  
Bellows Falls, VT 05101  
EDR Inquiry # 7537663.3

**Client Name:**

Weston & Sampson Engineers, Inc  
P.O. Box 189  
Waterbury, VT 05676  
Contact: Daniel Schuckers



The Sanborn Library has been searched by EDR and maps covering the target property location as provided by Weston & Sampson Engineers, Inc were identified for the years listed below. The Sanborn Library is the largest, most complete collection of fire insurance maps. The collection includes maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow, and others. Only Environmental Data Resources Inc. (EDR) is authorized to grant rights for commercial reproduction of maps by the Sanborn Library LLC, the copyright holder for the collection. Results can be authenticated by visiting [www.edrnet.com/sanborn](http://www.edrnet.com/sanborn).

The Sanborn Library is continually enhanced with newly identified map archives. This report accesses all maps in the collection as of the day this report was generated.

### Certified Sanborn Results:

**Certification #** A0A4-469B-A05B  
**PO #** ENG24-0032  
**Project** 0 Bridge Street

**Maps Provided:**

1971	1896
1956	1891
1949	1885
1927	
1920	
1912	
1906	
1901	



Sanborn® Library search results

Certification #: A0A4-469B-A05B

The Sanborn Library includes more than 1.2 million fire insurance maps from Sanborn, Bromley, Perris & Browne, Hopkins, Barlow and others which track historical property usage in approximately 12,000 American cities and towns. Collections searched:

- Library of Congress
- University Publications of America
- EDR Private Collection

*The Sanborn Library LLC Since 1866™*

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## Sanborn Sheet Key

This Certified Sanborn Map Report is based upon the following Sanborn Fire Insurance map sheets.



### 1971 Source Sheets



Volume 1, Sheet 5  
1971



Volume 1, Sheet 2  
1971



Volume 1, Sheet 3  
1971

### 1956 Source Sheets



Volume 1, Sheet 3  
1956



Volume 1, Sheet 5  
1956

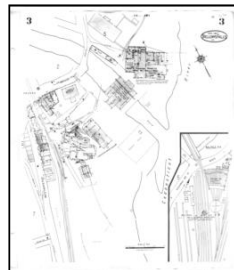


Volume 1, Sheet 2  
1956

### 1949 Source Sheets



Volume 1, Sheet 2  
1949



Volume 1, Sheet 3  
1949

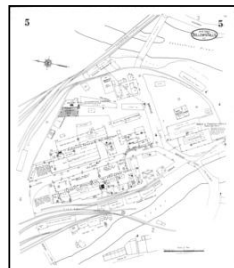


Volume 1, Sheet 5  
1949

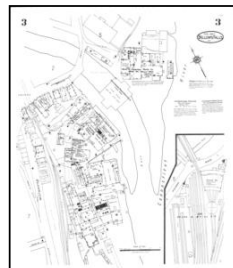
### 1927 Source Sheets



Volume 1, Sheet 2  
1927



Volume 1, Sheet 5  
1927



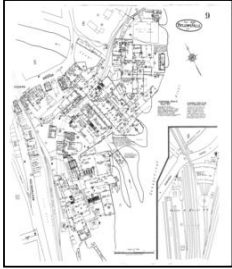
Volume 1, Sheet 3  
1927

## Sanborn Sheet Key

This Certified Sanborn Map Report is based upon the following Sanborn Fire Insurance map sheets.



### 1920 Source Sheets



Volume 1, Sheet 9  
1920



Volume 1, Sheet 6  
1920

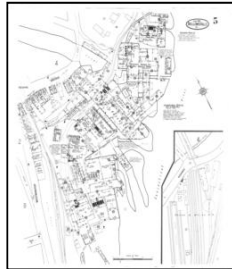


Volume 1, Sheet 8  
1920

### 1912 Source Sheets



Volume 1, Sheet 4  
1912



Volume 1, Sheet 5  
1912



Volume 1, Sheet 2  
1912

### 1906 Source Sheets



Volume 1, Sheet 5  
1906

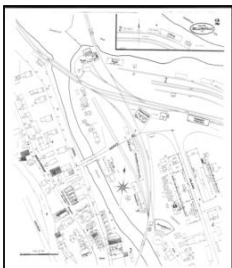


Volume 1, Sheet 8  
1906

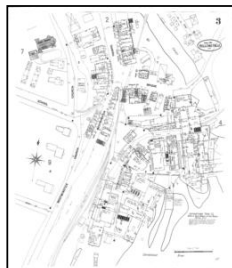


Volume 1, Sheet 7  
1906

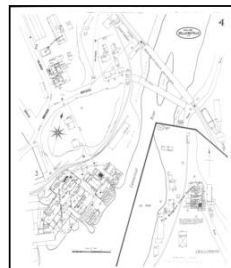
### 1901 Source Sheets



Volume 1, Sheet 2  
1901



Volume 1, Sheet 3  
1901



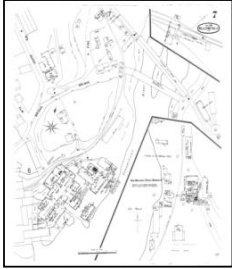
Volume 1, Sheet 4  
1901

## Sanborn Sheet Key

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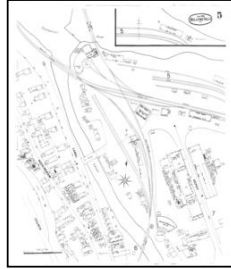
### 1896 Source Sheets



Volume 1, Sheet 7  
1896



Volume 1, Sheet 6  
1896

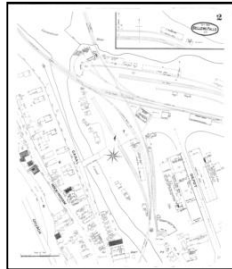


Volume 1, Sheet 5  
1896

### 1891 Source Sheets



Volume 1, Sheet 3  
1891



Volume 1, Sheet 2  
1891



Volume 1, Sheet 4  
1891

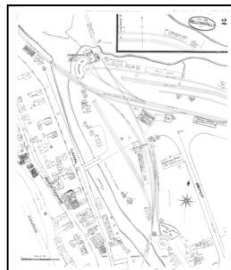
### 1885 Source Sheets



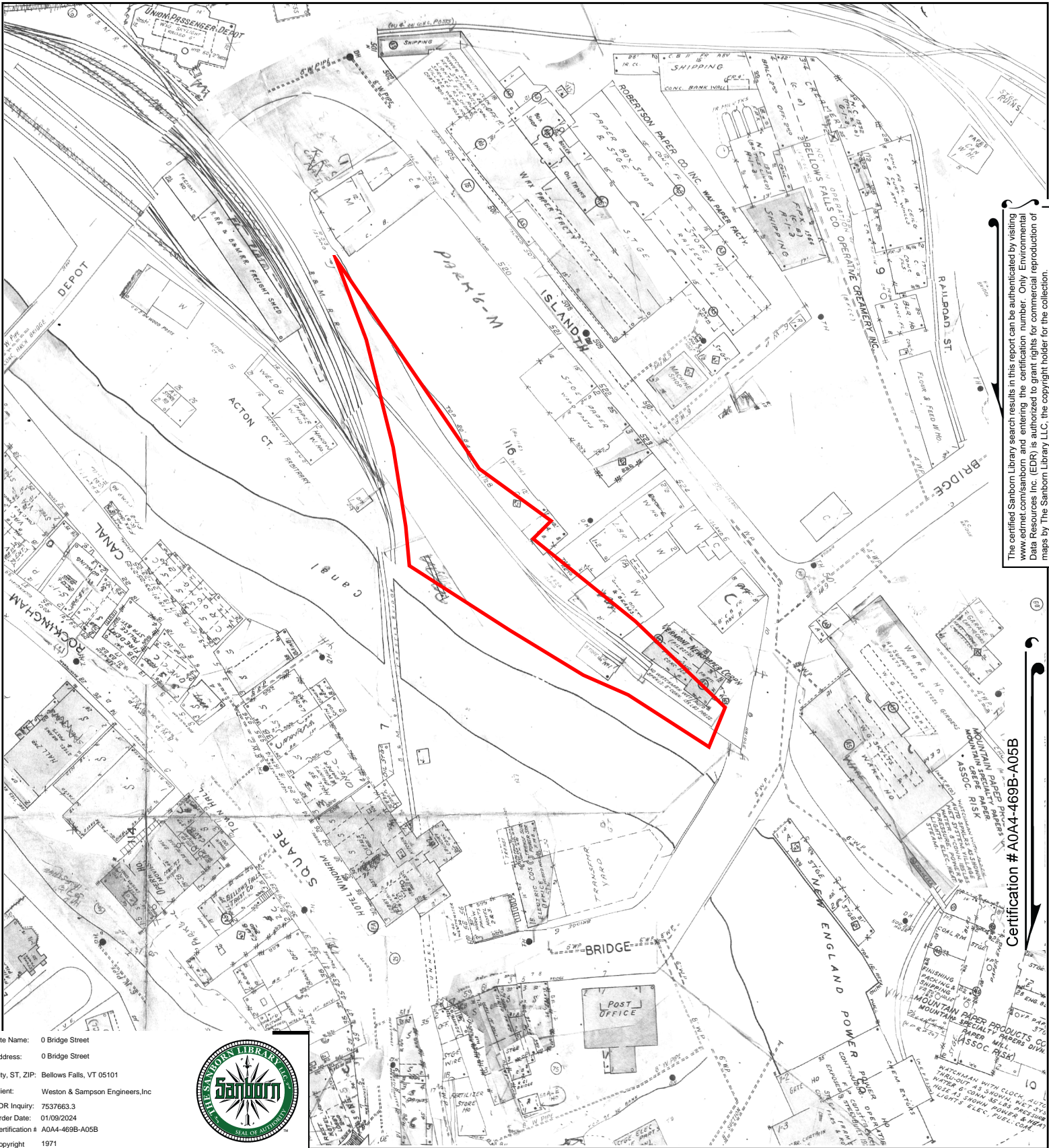
Volume 1, Sheet 4  
1885



Volume 1, Sheet 3  
1885



Volume 1, Sheet 2  
1885



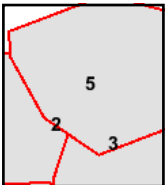
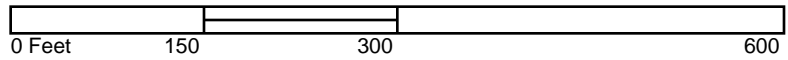
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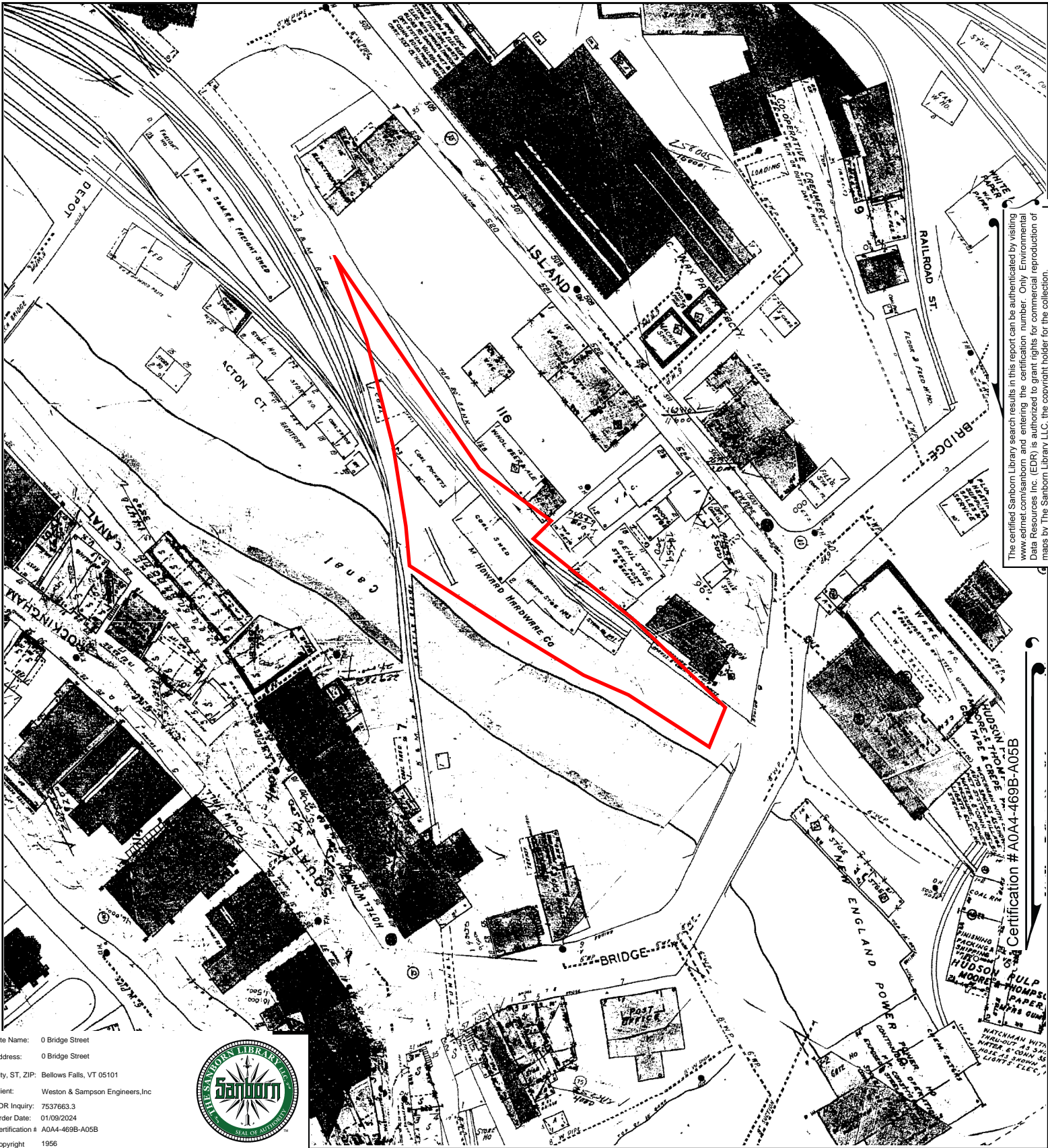


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 Outlined areas indicate map sheets within the collection.



Volume 1, Sheet 3  
 Volume 1, Sheet 2  
 Volume 1, Sheet 5





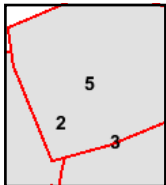
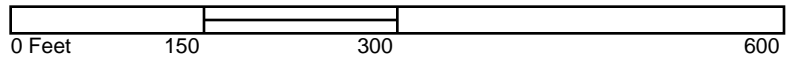
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 Certification # A0A4-469B-A05B  
 Copyright 1956

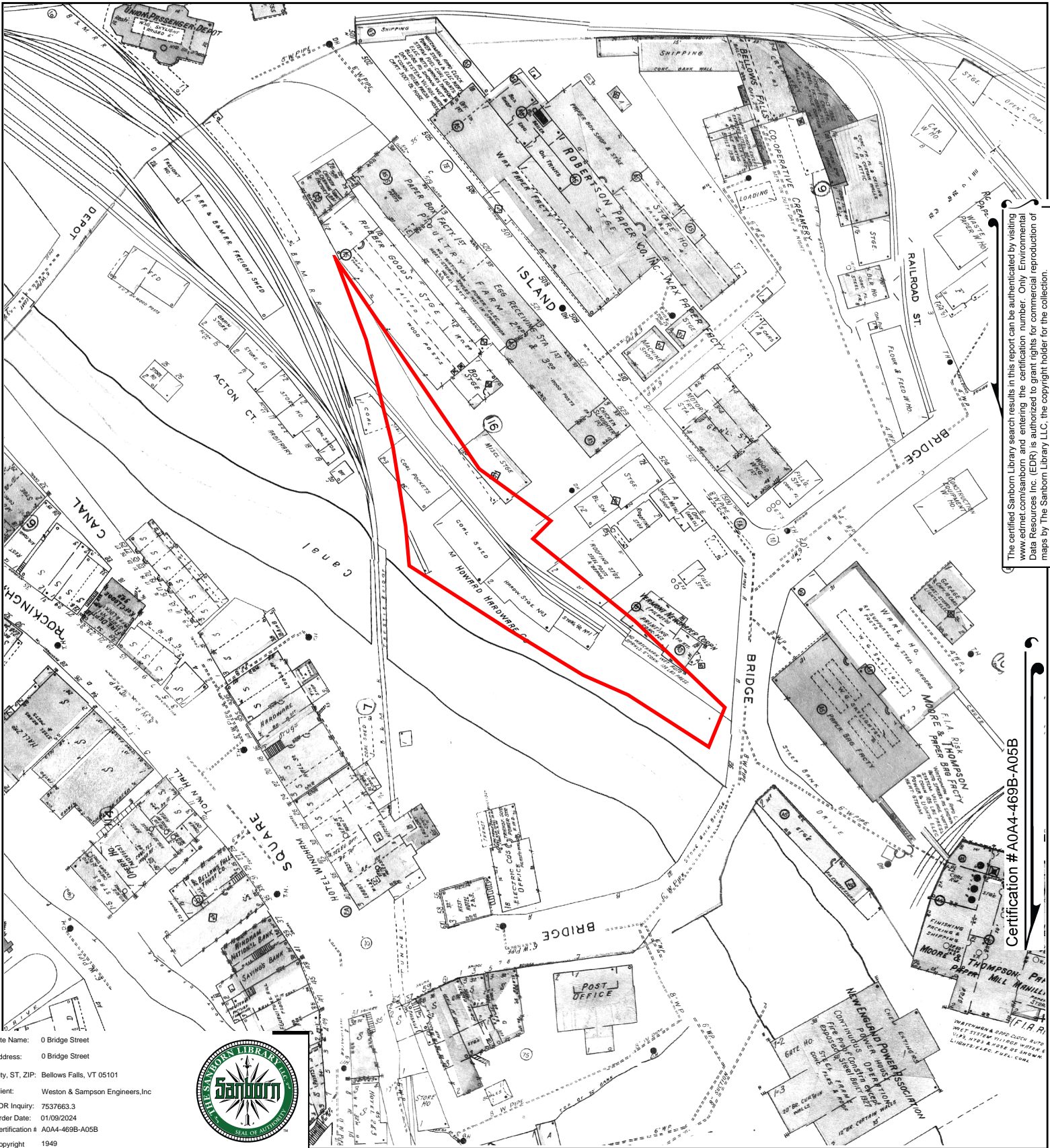


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Volume 1, Sheet 2  
 Volume 1, Sheet 5  
 Volume 1, Sheet 3

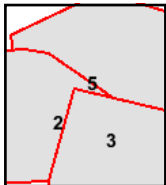
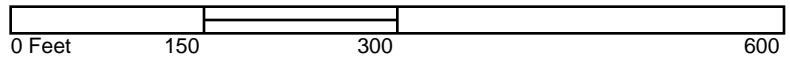




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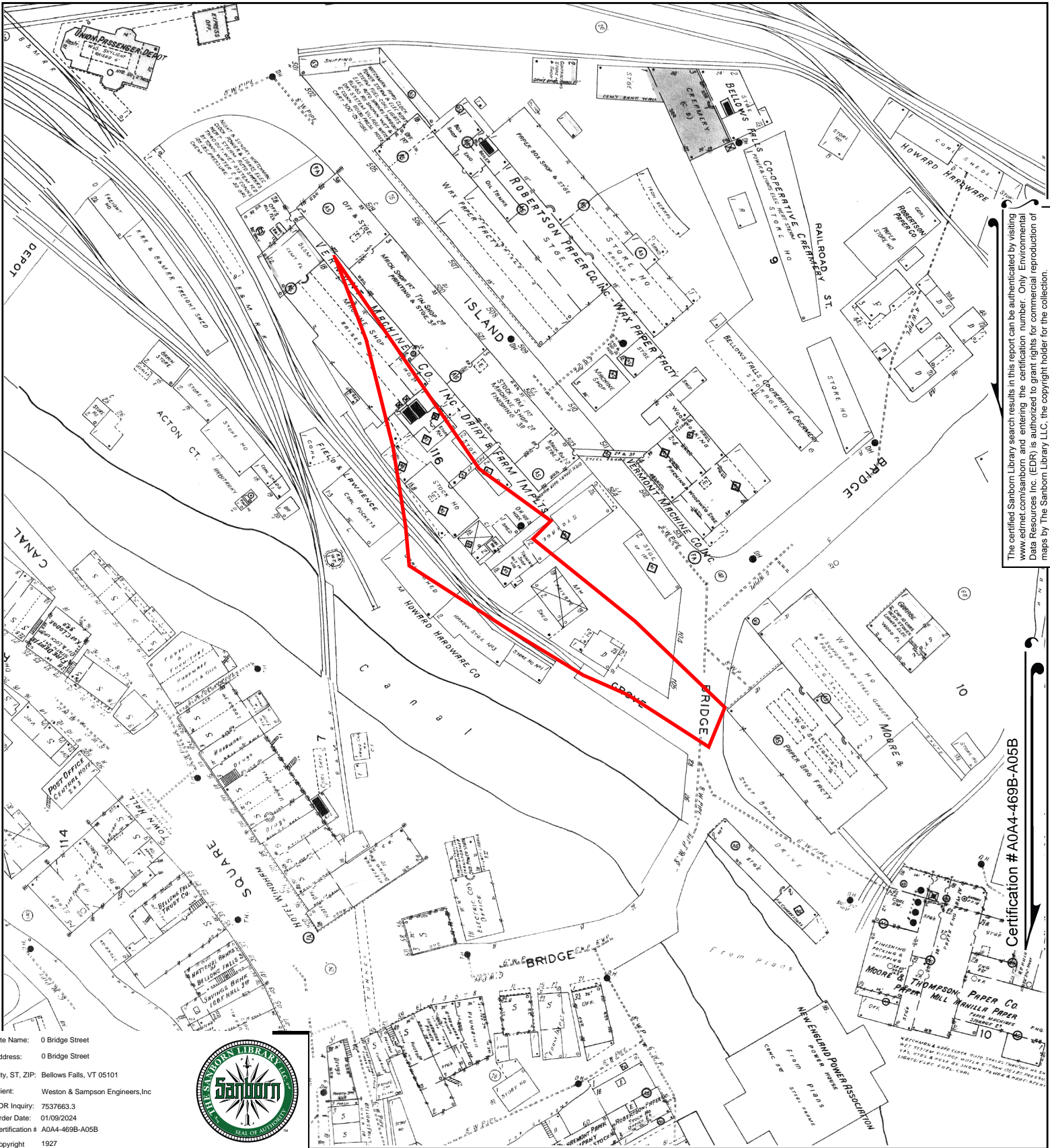


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Volume 1, Sheet 5  
 Volume 1, Sheet 3  
 Volume 1, Sheet 2





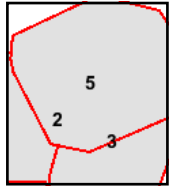
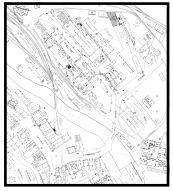
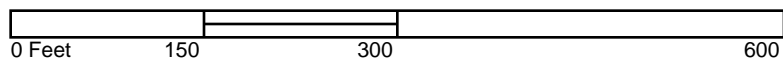
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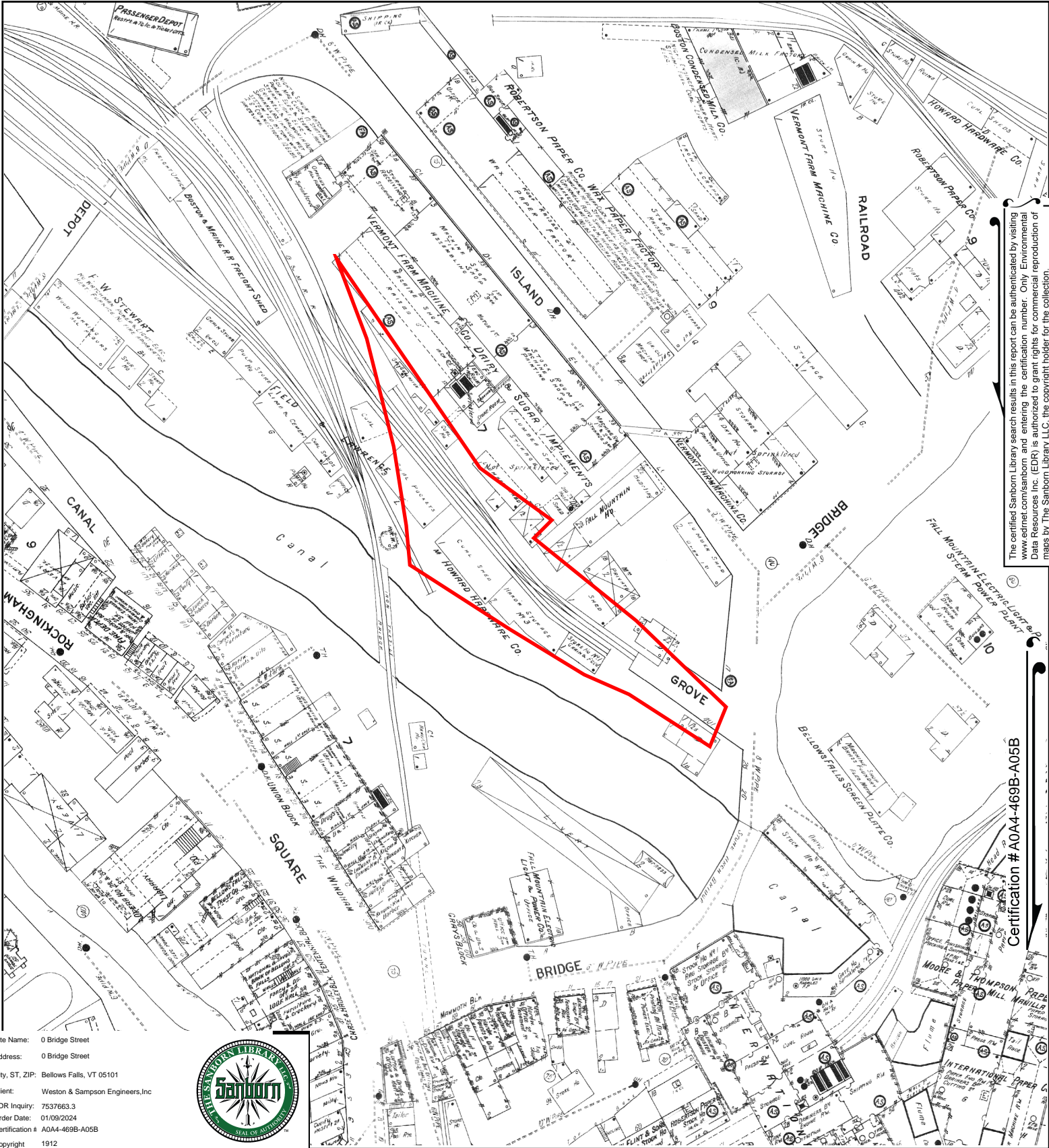
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Volume 1, Sheet 3  
 Volume 1, Sheet 5  
 Volume 1, Sheet 2







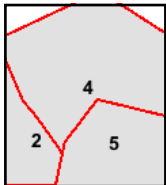
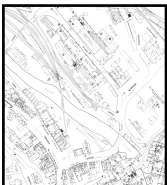
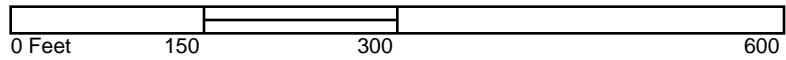
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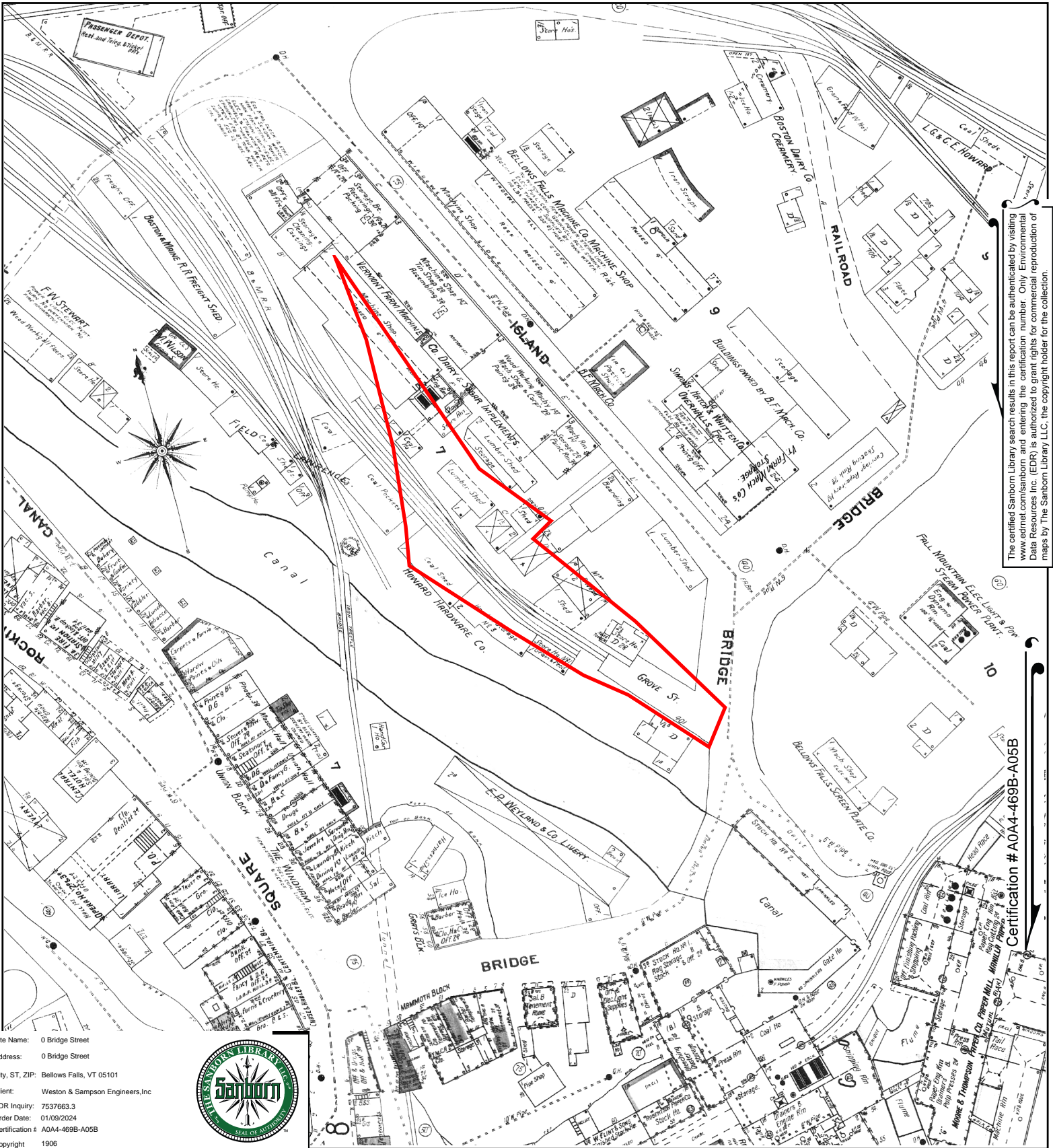


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Volume 1, Sheet 2  
 Volume 1, Sheet 5  
 Volume 1, Sheet 4





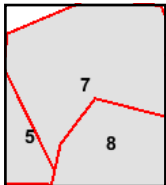
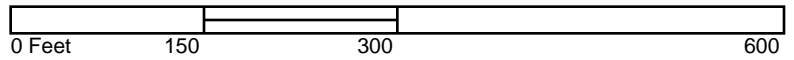
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 Copyright 1906



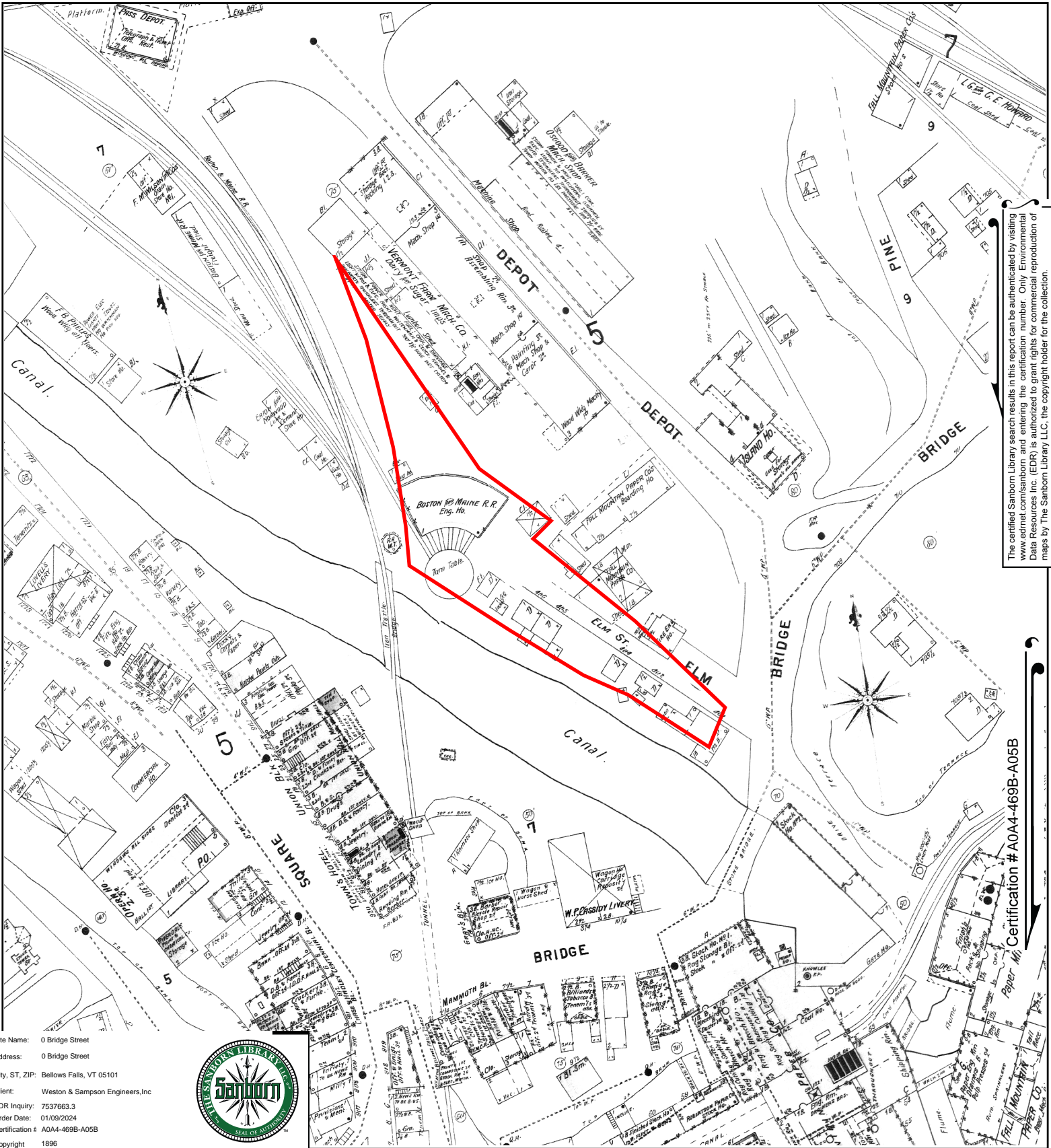
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Volume 1, Sheet 7  
 Volume 1, Sheet 8  
 Volume 1, Sheet 5







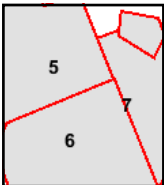
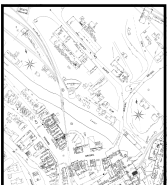
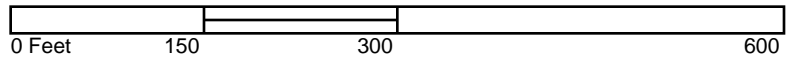
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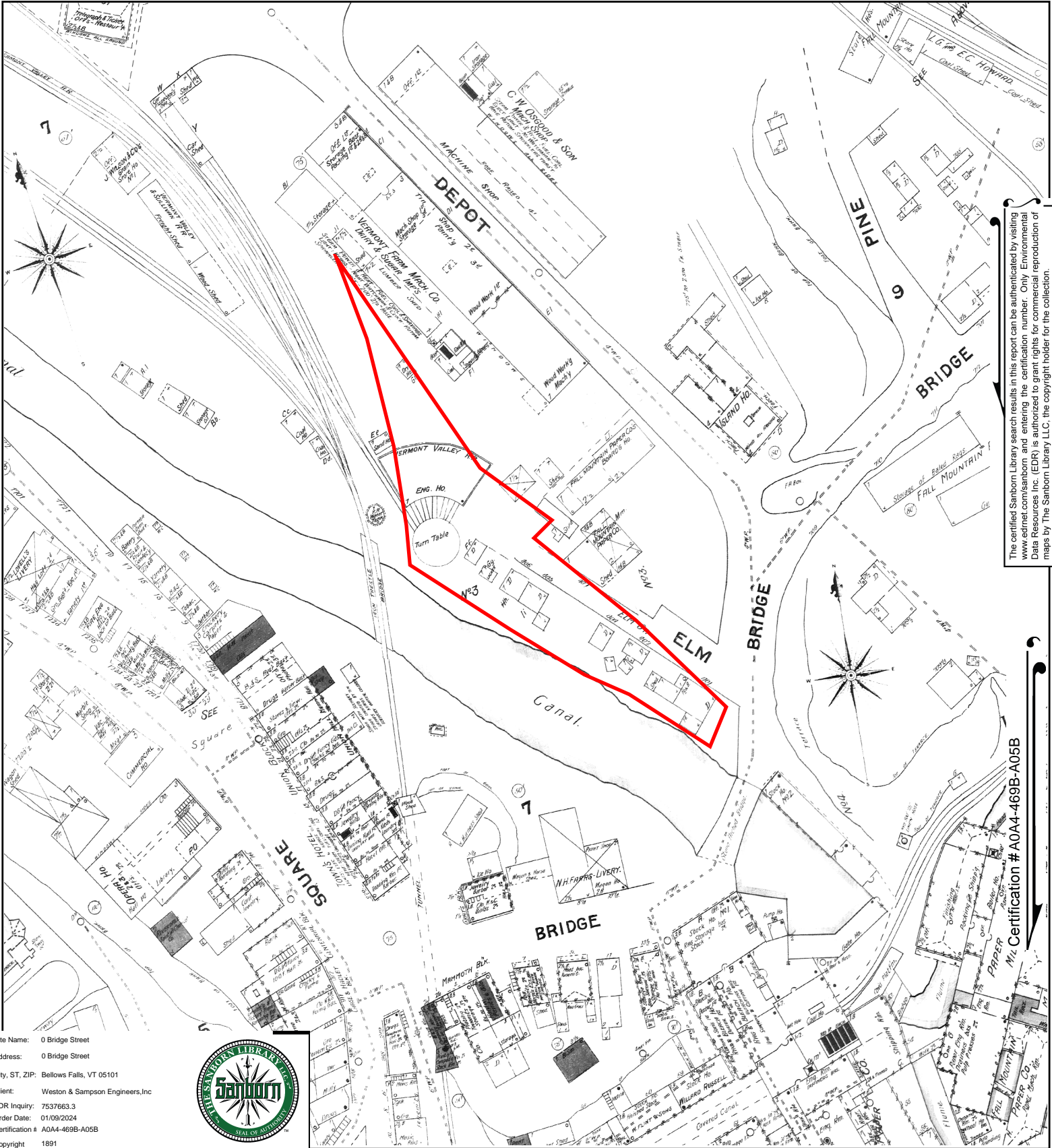


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Volume 1, Sheet 5  
 Volume 1, Sheet 6  
 Volume 1, Sheet 7

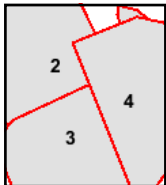
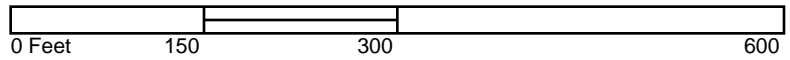




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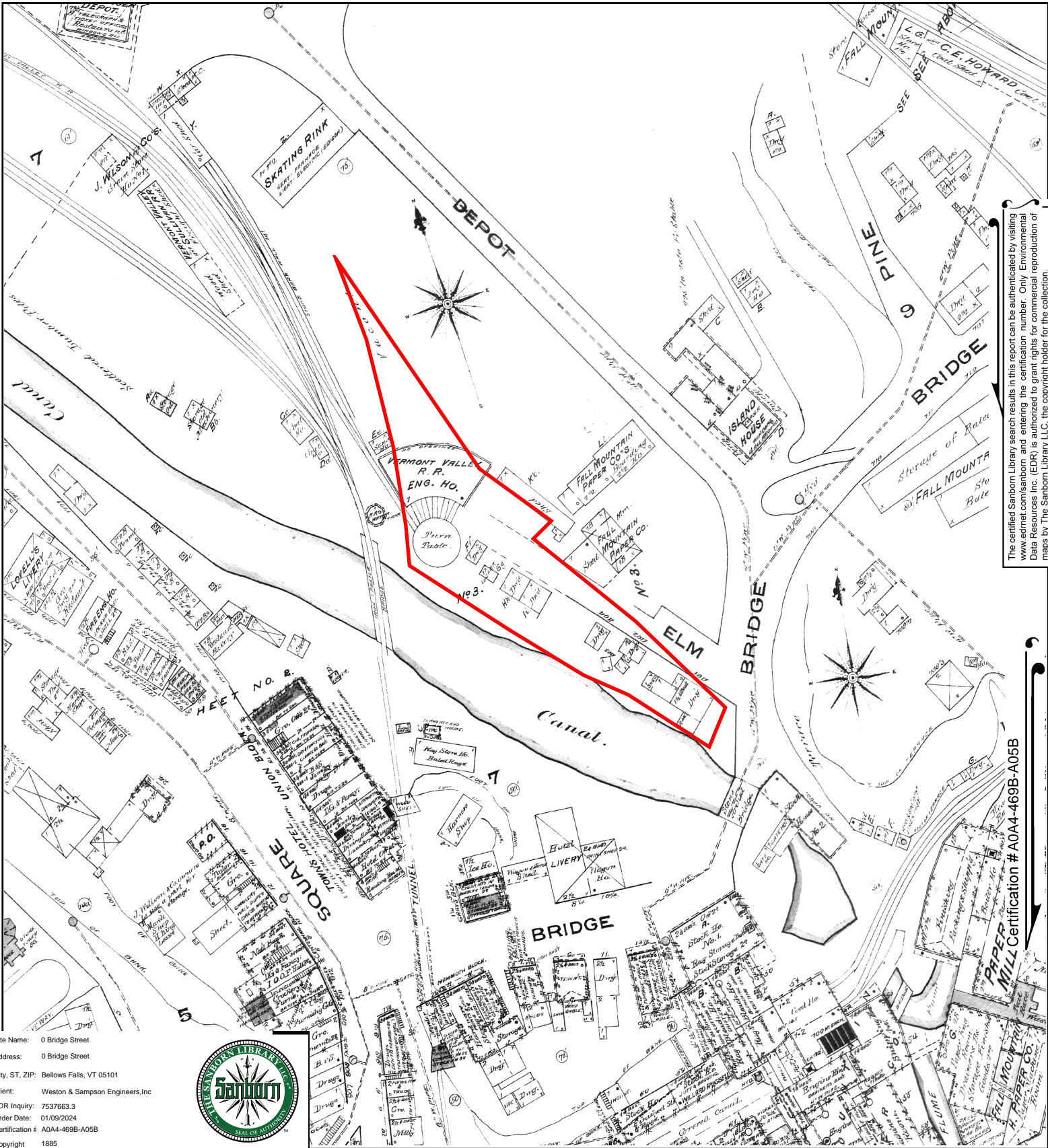


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Volume 1, Sheet 4  
 Volume 1, Sheet 2  
 Volume 1, Sheet 3





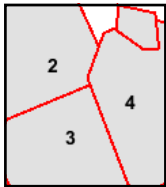
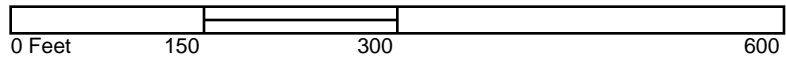
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Volume 1, Sheet 2  
 Volume 1, Sheet 3  
 Volume 1, Sheet 4

