

HARPER ENVIRONMENTAL

June 10, 2004

Mr. Chuck Schwer, Supervisor
Sites Management Section, VTDEC
Waste Management Division
103 S. Main St./West Building
Waterbury, Vermont 05671-0404

**SUBJECT: Results of the Site Investigation of the Former Springtree Corporation Site,
Brattleboro, VT; SMS Site# 921310**

Dear Mr. Schwer,

A site investigation was completed on May 12, 2004 at the former Springtree Corporation (STC) site in Brattleboro, VT. Harper Environmental Associates, Inc. (HEA) is pleased to submit a summary of our field procedures, and the results from the soil screening, monitoring well (MW) installation and groundwater sampling event. This report is subject to the limitations found in the Appendix B.

Site Background

Mr. Paul Simons, an owner of the property, contracted HEA to determine the degree and extent of contamination, if any, from an old release of gasoline from an underground storage tank (UST #3) removed by James H. Shippee on October 6, 1992. UST #3 had a capacity of 4,000 gallons and stored gasoline according to the Shippee report.

At the time of the UST removal, soil from the excavation was screened with a PID and the soil had results of up to 4,400 parts per million (ppm) of volatile organic compounds (VOCs). The highest PID result was from a depth of approximately 17 feet below grade (bg) in soil described as river silts. According to the UST closure report, the south end of UST #3 had the highest levels of petroleum contaminated soil (PCS). Approximately 32 cubic yards of PCS were segregated, stockpiled onsite, and covered with plastic.

A letter from the VTDEC SMS dated January 14, 2004 was received by the owner and it requested that an additional field investigation be conducted to:

- Further investigate soil and groundwater impact by PCS
- Complete a sensitive receptor survey
- Determine the need for long-term monitoring or treatment
- Submit a report summarizing the site characterization.

The intention of this investigation was to determine if the gasoline loss is impacting soil, groundwater and/or surface water (West River) in the immediate area around and downgradient of the former UST.

General Site Description

This commercial site is located at Spring Tree Road off of Putney Road in Brattleboro Vermont (Figures 1 and 2). The latitude of the site is N 42° 52.162', and the longitude is W 72° 33.527'.

Two commercial buildings are located on the site. They consist of a large office building that was converted from a barn and currently houses the Vermont Department of Corrections facility. The second building is much smaller and contains the Community High School of Vermont.

The surrounding abutters are: the Marina restaurant and bar located to the west and bordering the West River; Thomas' Garage to the north; Putney Road to the east and commercial buildings to the south. The West River is found approximately 75 feet from the western edge of the property. The West River flows in a southerly direction.

Geologically, this area of southeastern VT lies in the Devonian Waits River Formation comprised mostly of north-south trending faults of phyllites, greenschists, garnet schists and quartzite. The meta-igneous Guilford dome is located just to the west of the site.

The soils encountered during the installation of monitoring wells consisted of brown, fine sandy silt and silty fine sand. Some bands of sand and gravel were encountered between 4 and 13 feet below grade (bg).

Depth to water was gauged at approximately 13 feet bg. The groundwater system is under unconfined conditions and groundwater is moving in a northwesterly direction towards the West River (Figure 3).

Table 1: Groundwater Elevations
May 17, 2004

| Well ID | Gauge Date | Casing Elevation*(FT) | Depth To Water (FT) | Depth To SEP. Phase (FT) | Groundwater Elevation (FT) |
|---------|------------|-----------------------|---------------------|--------------------------|----------------------------|
| MW 1 | 05/17/04 | 100.22 | 16.20 | NA | 84.02 |
| MW 2 | 05/17/04 | 100.26 | 16.28 | NA | 84.08 |
| MW 3 | 05/17/04 | 96.39 | 12.96 | NA | 83.43 |
| MW 4 | 05/17/04 | 96.40 | 12.93 | NA | 83.47 |

Preliminary Activities

Prior to field activities, HEA prepared a site- specific Health and Safety Plan in accordance with OSHA 29 Code of Federal Regulations 1910 and 1929. During the investigation, the plan was kept on-site and signed by all field staff.

HEA walked the site prior to field activities and located the potential groundwater sampling locations. All subsurface utilities were marked-out prior to drilling through Vermont's dig-safe services and the town water/sewer department.

The basements of the two-on-site buildings were screened with a Mini Rae 2000 PID on the day of drilling in order to determine if fugitive gasoline vapors were entering the basements. No readings were noted after screening the basements of each location. No stains or odors were noticed on the basement walls or floors.

Monitoring Well Installation

On May 12, 2004, HEA supervised the installation of four soil borings at the site and the installation of 2-inch pvc screen and blank in all of the borings (Appendix B: Well Logs). The location of each monitoring well (MW) is shown on Figure 2. The MWs were located in the following locations:

- MW-1 was drilled next to the former LUST tank pit.
- MW-2 was placed side-gradient from the tank pit approximately 65 feet away from MW 1.
- MW-3 was installed as a downgradient location well towards the West River approximately 85 feet from MW 1.
- MW-4 was installed in a downgradient location between MW 2 and MW 3, approximately 75 feet from MW 1

T&K Drilling from Troy, NH used a 4.25-inch hollow-stem auger, drilling rig to install the MWs. None of the well locations met refusal due to interference by cobbles and gravel, and/or bedrock. Brown, fine sandy silt and silty fine sand with some bands of sand and gravel between 4 and 13 feet below grade (bg) were encountered. The MWs were installed to a depth of approximately 20-25 fbg.

Select soil samples were collected from each MW using a 1.5-inch by 2-foot long split-spoon, discrete sampler driven by a 140-pound hammer over a 30-inch fall. All downhole drilling equipment was cleaned with steam between holes, and soil samples were extracted from the split-spoon sampler for field PID-screening.

The soil samples were brought to the surface and were visually classified by a Certified Professional Geologist. All soil samples were screened in the field for volatile organic compounds (VOC) using a Mini Rae 2000 photoionizer detector (PID). Field soil samples were collected in a sealed plastic bags or glass jars. The tip of the PID was inserted into the bag or jar to measure VOC content.

All of the four borings were completed as 2-inch, 0.010 slot PVC wells. The borehole annulus was filled with pack sand to approximately one foot above the top of the well screen. Granular bentonite was placed above the sand pack and the well annulus was filled to the ground surface with native material and cement grout.

Two stick-up well covers (MW-1 & 2) and two flush-mounted road boxes (MW-3 & 4) were cemented into place over the four MWs. All wells were developed on May 12 and 17, 2004 using an electric peristaltic pump and hand bailing techniques. No phase-separated product was found on the water table during either site visit.

Field Analytical Results-Soil

During the onsite, soil-screening activities conducted during the MW installation on May 12, 2004, the Mini Rae 2000 PID did not detect any VOC readings from the any of the extracted soil samples or from the drill cuttings.

Analytical Results-Groundwater

Groundwater samples from MWs 1, 2, 3 & 4 were submitted to a certified laboratory and analyzed for volatile organic compounds by GC/MS (EPA Method 8021B). The results of the analyses are summarized in the table below. The full laboratory analytical reports can be found attached to this letter report in Appendix A.

TABLE 1
Groundwater Analytical Results
 (Sampled on May 17, 2004)

| ANALYTE EPA 8021B (VT LIST) | MW-1 | MW-2 | MW-3 | MW-4 | Vermont's Primary Groundwater Enforcement Standards |
|-----------------------------------|------|------|------|------|---|
| | ppb | ppb | ppb | ppb | ppb |
| Benzene | ND | ND | ND | ND | 5 |
| Ethylbenzene | ND | ND | ND | ND | 700 |
| Methyl-t-butyl ether | ND | ND | ND | ND | 40 |
| Naphthalene | ND | ND | ND | ND | 20 |
| Toluene | ND | ND | ND | ND | 1,000 |
| 1,3,5- Trimethylbenzene | ND | ND | ND | ND | 4 |
| 1,2,4- Trimethylbenzene | ND | ND | ND | ND | 5 |
| meta & para- Xylene | ND | ND | ND | ND | Total xylenes= 10,000 |
| ortho- Xylene | ND | ND | ND | ND | |

Bold indicates an exceedance with Vermont's Primary Groundwater Enforcement Standards

ND= not detected and below reporting level for the analyte

ppb = parts per billion

Potential Receptors

Identification of the potential receptors in proximity to the site was determined during this investigation. A relative degree of risk, from the contamination identified during this study, was assigned to each receptor. The potential receptors include groundwater, soil, drinking water, surface water, indoor air and subsurface utilities.

Groundwater

Groundwater analytical data from the May 17, 2004 sampling event indicated that no petroleum-type hydrocarbons have impacted the groundwater at the site downgradient from the former UST area.

Potential receptors would include the West River, which is discussed under the surface water heading, and the shallow groundwater system. There is no risk of exposure to groundwater since no petroleum hazard exists based on the recent groundwater results.

Soil

Soil impact by petroleum-type hydrocarbons was not detected during the installation of the four borings. Consequently exposure to humans through direct contact with PCS from this site does not exist.

The 32 cubic yards of PCS that was excavated and stockpiled onsite during the 1992 UST removals has been incorporated into the asphalt paving of the parking area according to the owner of the property. Consequently no exposure from the PCS exists.

Drinking Water

The Town of Brattleboro provides drinking water to the site. No onsite wells were found during the investigation.

Indoor Air

There are two commercial structures onsite. The VT Department of Corrections building, which is located close to the former UST area and the Community High School of Vermont. Both buildings were inspected for vapor intrusion by VOCs on the day of MW installation. No vapors were detected in the basements of either building.

Subsurface Utilities

Subsurface utilities (water and sewer) cross the subsurface near the former location of the USTs. No petroleum odors were detected from the manhole of the sewer line.

Surface Waters

The site is located on a slight slope that topographically drains towards the West River, located approximately 75 feet from the west edge of the property. Surface runoff and groundwater from the site would be expected to flow toward the West River.

The West River is at a low risk from impact by the 1992 petroleum release at this site since no petroleum compounds were detected in the four MWs recently installed on the property. This is also based on a stream bank inspection that was conducted on May 12, 2004. No odors, sheens, or unusual conditions were noticed emanating from the subject property during the stream inspection.

General Discussion of the Soil and Groundwater Analytical Results

A release of gasoline from the former UST #3 during 1992 had occurred at the STC Industries property as determined from soil contamination assessed during the removal of the tank (James Shippee report, 10/92). The PCS from the UST removal was stockpiled and kept onsite until it was used to provide a base for the asphalt parking lot several years ago, according to the owner.

Current groundwater results from the four MWs indicated that no levels of gasoline hydrocarbons including benzene, toluene, ethylbenzene, total xylenes, MTBE and trimethylbenzenes exist in groundwater.

The field, soil-screening results from all of the soil borings did not detect any gasoline hydrocarbons readings. The soil and groundwater results indicate that no petroleum hydrocarbons, as analyzed by the EPA Method 8021B (VT List), are currently impacting

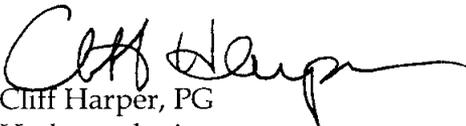
either the soil or groundwater in the immediate vicinity and downgradient of the former LUST tank pit.

Recommendations

We recommend that the monitoring wells be sealed and abandoned as per the VTDEC Water Supply requirements and that the site be offered a Site Management Activity Completed (SMAC) designation based on the information supplied in this report.

If you have any questions with the summary of field procedures or analytical results of this report, please contact us at (802) 672-6112. We look forward to closing this site.

Respectfully submitted,
Harper Environmental Associates, Inc.


Cliff Harper, PG
Hydrogeologist

Attachments: Figure 1: Site Location Map
Figure 2: Site Map
Figure 3: Groundwater Gradient Map
Appendix A: Groundwater Analytical Laboratory Report
Appendix B: Well Logs, Limitations

Cc: Mr. Paul Simons, STC Industries

FIGURE 1: STC Industries
Spring Tree Road
Brattleboro, VT 05302



© 2001 DeLorme, Topo USA® 3.0

Zoom Level: 12-0 Datum: WGS84

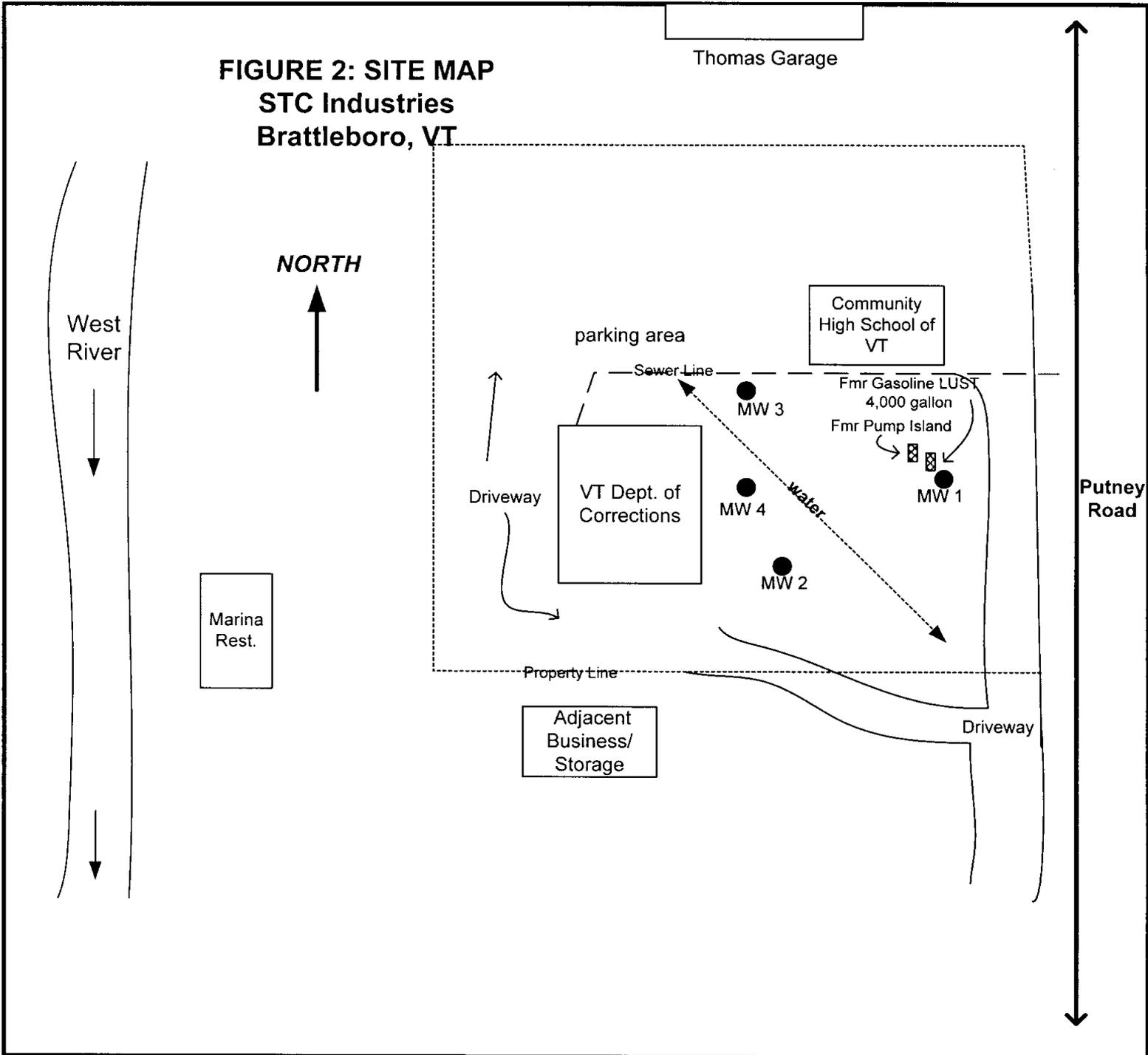
Scale 1 : 50,000

1" = 4,166.67 ft



Harper Environmental Associates

FIGURE 2: SITE MAP
STC Industries
Brattleboro, VT



STC Industries
Spring Tree Road
Brattleboro, VT 05301

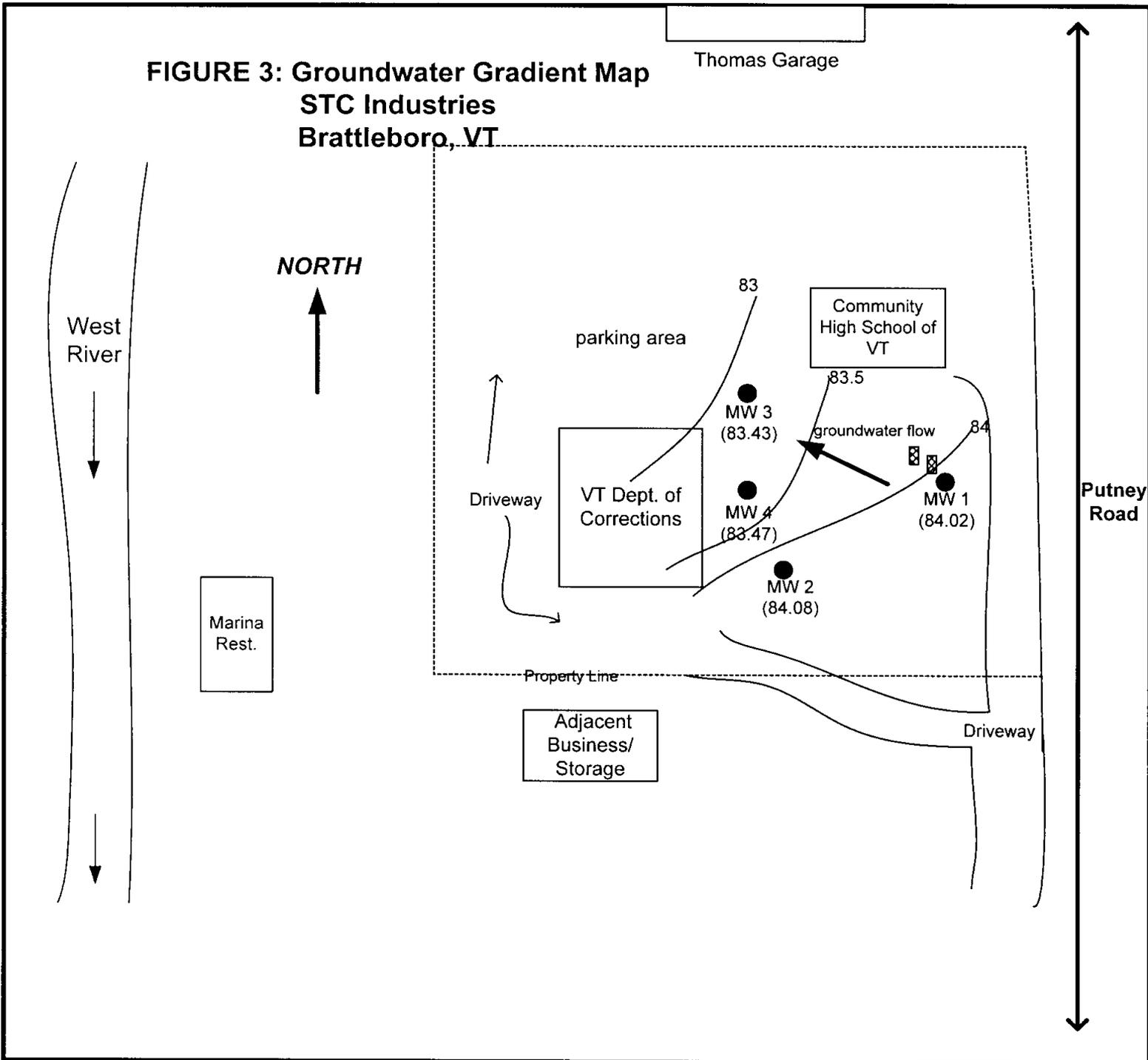
Project: STC Industries Soil/Groundwater Investigation

VTDEC SMS Site # 921310
MW = Monitoring Well

Figure 2 SITE MAP
1 INCH = 55 FEET

Harper Environmental Associates

**FIGURE 3: Groundwater Gradient Map
STC Industries
Brattleboro, VT**



**STC Industries
Spring Tree Road
Brattleboro, VT 05301**

Project: STC Industries Soil/Groundwater Investigation

**VTDEC SMS Site # 921310
MW = Monitoring Well
84 = groundwater elevation**

**Figure 3 Gradient Map
1 INCH = 55 FEET**

GROUNDWATER ANALYTICAL

Groundwater Analytical, Inc.
P.O. Box 1200
228 Main Street
Buzzards Bay, MA 02532

Telephone (508) 759-4441
FAX (508) 759-4475
www.groundwateranalytical.com

June 3, 2004

Mr. Cliff Harper
Harper Environmental Associates
1811 Hale Hollow Road
Bridgewater, VT 05035

LABORATORY REPORT

Project: **STC**
Lab ID: **72799**
Received: **05-19-04**

Dear Cliff:

Enclosed are the analytical results for the above referenced project. The project was processed for Standard turnaround.

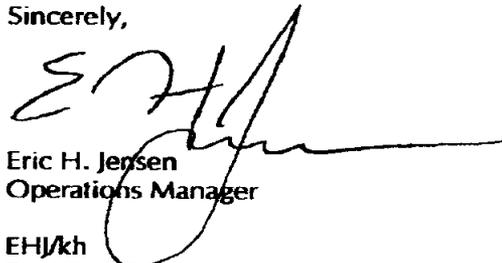
This letter authorizes the release of the analytical results, and should be considered a part of this report. This report contains a sample receipt report detailing the samples received, a project narrative indicating project changes and non-conformances, a quality control report, and a statement of our state certifications.

The analytical results contained in this report meet all applicable NELAC standards, except as may be specifically noted, or described in the project narrative. This report may only be used or reproduced in its entirety.

I attest under the pains and penalties of perjury that, based upon my inquiry of those individuals immediately responsible for obtaining the information, the material contained in this report is, to the best of my knowledge and belief, accurate and complete.

Should you have any questions concerning this report, please do not hesitate to contact me.

Sincerely,



Eric H. Jensen
Operations Manager

EHI/kh
Enclosures

GROUNDWATER ANALYTICAL

Sample Receipt Report

Project: STC
 Client: Harper Environmental Associates
 Lab ID: 72799

Delivery: UPS
 Airbill: 1Z7257ZF0300246700
 Lab Receipt: 05-19-04

Temperature: 3.1°C
 Chain of Custody: Present
 Custody Seal(s): n/a

| Lab ID | Sample ID | | Matrix | Sampled | Method | | | | Name |
|---------|----------------|------------|---------|---------------|-------------------------------|----------|----------|--|------|
| 72799-1 | MW 1 | | Aqueous | 5/17/04 11:00 | EPA 8021B Vermont Target List | | | | |
| Con ID | Container | Vendor | QC Lot | Preserv | QC Lot | Prep | Ship | | |
| C334862 | 40 mL VOA Vial | Industrial | BX8447 | HCl | R-3645F | 06-30-03 | 07-11-03 | | |
| C334850 | 40 mL VOA Vial | Industrial | BX8447 | HCl | R-3645F | 06-30-03 | 07-11-03 | | |
| 72799-2 | WW 2 | | Aqueous | 5/17/04 11:10 | EPA 8021B Vermont Target List | | | | |
| Con ID | Container | Vendor | QC Lot | Preserv | QC Lot | Prep | Ship | | |
| C334860 | 40 mL VOA Vial | Industrial | BX8447 | HCl | R-3645F | 06-30-03 | 07-11-03 | | |
| C334848 | 40 mL VOA Vial | Industrial | BX8447 | HCl | R-3645F | 06-30-03 | 07-11-03 | | |
| 72799-3 | MW 3 | | Aqueous | 5/17/04 11:15 | EPA 8021B Vermont Target List | | | | |
| Con ID | Container | Vendor | QC Lot | Preserv | QC Lot | Prep | Ship | | |
| C334861 | 40 mL VOA Vial | Industrial | BX8447 | HCl | R-3645F | 06-30-03 | 07-11-03 | | |
| C334849 | 40 mL VOA Vial | Industrial | BX8447 | HCl | R-3645F | 06-30-03 | 07-11-03 | | |
| 72799-4 | MW 4 | | Aqueous | 5/17/04 11:30 | EPA 8021B Vermont Target List | | | | |
| Con ID | Container | Vendor | QC Lot | Preserv | QC Lot | Prep | Ship | | |
| C334863 | 40 mL VOA Vial | Industrial | BX8447 | HCl | R-3645F | 06-30-03 | 07-11-03 | | |
| C334851 | 40 mL VOA Vial | Industrial | BX8447 | HCl | R-3645F | 06-30-03 | 07-11-03 | | |

GROUNDWATER ANALYTICAL

EPA Method 8021B VT List Volatile Organics by GC/PID

| | | | |
|----------------|---------------------------------|------------------|----------------|
| Field ID: | MW 1 | Matrix: | Aqueous |
| Project: | STC | Container: | 40 mL VOA Vial |
| Client: | Harper Environmental Associates | Preservation: | HCl/Cool |
| Laboratory ID: | 72799-01 | QC Batch ID: | VG1-1967-W |
| Sampled: | 05-17-04 11:00 | Instrument ID: | GC-1 HP 5890 |
| Received: | 05-19-04 10:00 | Sample Volume: | 5 mL |
| Analyzed: | 05-27-04 18:15 | Dilution Factor: | 1 |
| Analyst: | PO | | |

| | | | | |
|---------------------|--------------------------------|-----|------|------------|
| 1634-04-4 | Methyl tert-butyl Ether (MTBE) | BRL | ug/L | 5 |
| 71-43-2 | Benzene | BRL | ug/L | 1 |
| 108-88-3 | Toluene | BRL | ug/L | 1 |
| 100-41-4 | Ethylbenzene | BRL | ug/L | 1 |
| 108-38-3/106-42-3 | meta-Xylene and para-Xylene | BRL | ug/L | 1 |
| 95-47-6 | ortho-Xylene | BRL | ug/L | 1 |
| 108-67-8 | 1,3-Trimethylbenzene | BRL | ug/L | 1 |
| 95-63-6 | 1,2,4-Trimethylbenzene | BRL | ug/L | 1 |
| 91-20-3 | Naphthalene | BRL | ug/L | 5 |
| 2, 5-Dibromotoluene | | | | 70 - 130 % |
| | | 100 | 105 | 105 % |

Method Reference: Test Methods for Evaluating Solid Waste, US EPA, SW-846, Third Edition, Update III (1996).
Sample preparation performed by EPA Method 5030B.

Report Notations: BRL Indicates concentration, if any, is below reporting limit for analyte. Reporting limit is the lowest concentration that can be reliably quantified under routine laboratory operating conditions. Reporting limits are adjusted for sample size and dilution.

GROUNDWATER ANALYTICAL

EPA Method 8021B VT List Volatile Organics by GC/PID

Field ID: WW 2
 Project: STC
 Client: Harper Environmental Associates
 Laboratory ID: 72799-02
 Sampled: 05-17-04 11:10
 Received: 05-19-04 10:00
 Analyzed: 05-27-04 18:56
 Analyst: PO

Matrix: Aqueous
 Container: 40 mL VOA Vial
 Preservation: HCl/Cool
 QC Batch ID: VG1-1967-W
 Instrument ID: GC-1 HP 5890
 Sample Volume: 5 mL
 Dilution Factor: 1

| | | | | |
|----------------------------|--------------------------------|-----|------|------------|
| 1634-04-4 | Methyl tert-butyl Ether (MTBE) | BRL | ug/L | 5 |
| 71-43-2 | Benzene | BRL | ug/L | 1 |
| 108-88-3 | Toluene | BRL | ug/L | 1 |
| 100-41-4 | Ethylbenzene | BRL | ug/L | 1 |
| 108-38-3/106-42-3 | meta-Xylene and para-Xylene | BRL | ug/L | 1 |
| 95-47-6 | ortho-Xylene | BRL | ug/L | 1 |
| 108-67-8 | 1,3,5-Trimethylbenzene | BRL | ug/L | 1 |
| 95-63-6 | 1,2,4-Trimethylbenzene | BRL | ug/L | 1 |
| 91-20-3 | Naphthalene | BRL | ug/L | 5 |
| 2, 5-Dibromotoluene | | | | |
| | | 100 | 103 | 103 % |
| | | | | 70 - 130 % |

Method Reference: Test Methods for Evaluating Solid Waste, US EPA, SW-846, Third Edition, Update III (1996).
 Sample preparation performed by EPA Method 5030B.

Report Notations: BRL Indicates concentration, if any, is below reporting limit for analyte. Reporting limit is the lowest concentration that can be reliably quantified under routine laboratory operating conditions. Reporting limits are adjusted for sample size and dilution.

GROUNDWATER ANALYTICAL

EPA Method 8021B VT List Volatile Organics by GC/PID

Field ID: MW 3
 Project: STC
 Client: Harper Environmental Associates
 Laboratory ID: 72799-03
 Sampled: 05-17-04 11:15
 Received: 05-19-04 10:00
 Analyzed: 05-27-04 20:17
 Analyst: PO

Matrix: Aqueous
 Container: 40 mL VOA Vial
 Preservation: HCl/Cool
 QC Batch ID: VG1-1967-W
 Instrument ID: GC-1 HP 5890
 Sample Volume: 5 mL
 Dilution Factor: 1

| | | | | |
|----------------------------|--------------------------------|-----|------|------------|
| 1634-04-4 | Methyl tert-butyl Ether (MTBE) | BRL | ug/L | 5 |
| 71-43-2 | Benzene | BRL | ug/L | 1 |
| 108-88-3 | Toluene | BRL | ug/L | 1 |
| 100-41-4 | Ethylbenzene | BRL | ug/L | 1 |
| 100-38-3/106-42-3 | meta-Xylene and para-Xylene | BRL | ug/L | 1 |
| 95-47-6 | ortho-Xylene | BRL | ug/L | 1 |
| 108-67-8 | 1,3,5-Trimethylbenzene | BRL | ug/L | 1 |
| 95-63-6 | 1,2,4-Trimethylbenzene | BRL | ug/L | 1 |
| 91-20-3 | Naphthalene | BRL | ug/L | 5 |
| 2, 5-Dibromotoluene | | | | |
| | | 100 | 104 | 104 % |
| | | | | 70 - 130 % |

Method Reference: Test Methods for Evaluating Solid Waste, US EPA, SW-846, Third Edition, Update III (1996).
 Sample preparation performed by EPA Method 5030B.

Report Notations: BRL Indicates concentration, if any, is below reporting limit for analyte. Reporting limit is the lowest concentration that can be reliably quantified under routine laboratory operating conditions. Reporting limits are adjusted for sample size and dilution.

GROUNDWATER ANALYTICAL

EPA Method 8021B VT List Volatile Organics by GC/PID

Field ID: MW 4
 Project: STC
 Client: Harper Environmental Associates
 Laboratory ID: 72799-04
 Sampled: 05-17-04 11:30
 Received: 05-19-04 10:00
 Analyzed: 05-27-04 20:58
 Analyst: PO

Matrix: Aqueous
 Container: 40 mL VOA Vial
 Preservation: HCl/Cool
 QC Batch ID: VG1-1967-W
 Instrument ID: GC-1 HP 5890
 Sample Volume: 5 mL
 Dilution Factor: 1

| Sample ID | Analyte | Concentration | Units | Reporting Limit |
|-------------------------------|--------------------------------|---------------|-------|----------------------|
| 1634-04-4 | Methyl tert-butyl Ether (MTBE) | BRL | ug/L | 5 |
| 71-43-2 | Benzene | BRL | ug/L | 1 |
| 108-88-3 | Toluene | BRL | ug/L | 1 |
| 100-41-4 | Ethylbenzene | BRL | ug/L | 1 |
| 108-38-3/106-42-3 | meta-Xylene and para-Xylene | BRL | ug/L | 1 |
| 95-47-6 | ortho-Xylene | BRL | ug/L | 1 |
| 108-67-8 | 1,3,5-Trimethylbenzene | BRL | ug/L | 1 |
| 95-63-6 | 1,2,4-Trimethylbenzene | BRL | ug/L | 1 |
| 91-20-3 | Naphthalene | BRL | ug/L | 5 |
| QC Sample: 2,5-Dibromotoluene | | 100 | 103 | 103 % |
| | | | | QC Limit: 70 - 130 % |

Method Reference: Test Methods for Evaluating Solid Waste, US EPA, SW-846, Third Edition, Update III (1996).
 Sample preparation performed by EPA Method 5030B.

Report Notations: BRL Indicates concentration, if any, is below reporting limit for analyte. Reporting limit is the lowest concentration that can be reliably quantified under routine laboratory operating conditions. Reporting limits are adjusted for sample size and dilution.

GROUNDWATER ANALYTICAL

Project Narrative

Project: STC
Client: Harper Environmental Associates

Lab ID: 72799
Received: 05-19-04 10:00

A. Documentation and Client Communication

The following documentation discrepancies, and client changes or amendments were noted for this project:

1. No documentation discrepancies, changes, or amendments were noted.

B. Method Modifications, Non-Conformances and Observations

The sample(s) in this project were analyzed by the references analytical method(s), and no method modifications, non-conformances or analytical issues were noted, except as indicated below:

1. EPA 8021B Non-conformance: Samples 72799-01,-02,-03,-04. Identification of analytes detected is tentative. Confirmation by a secondary column, or GC/MS analysis, was not performed for positive results. Groundwater Analytical recommends utilizing EPA 8260B for definitive identification of any analytes detected.

Drilling Log

Harper Environmental Associates

Well Number MW1

1811 Hale Hollow Road, Bridgewater Corners, VT (802) 672-6112 fax (802) 672-6227

Project STC Owner P. SIMONS Date Drilled 5.12.04

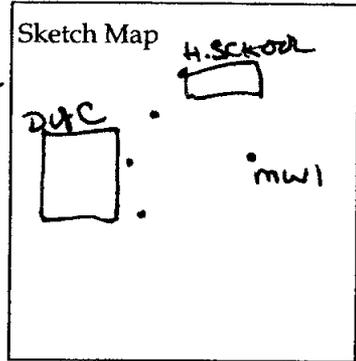
Location BRATTLEBORO Drilling Co. T+K Method HS AURK

Drilled by _____ Logged by CH Diameter 4.25

Total Depth of Borehole 25 Surface Elevation - Slot Size .010"

Water Level, initial -13' 24 hrs. _____ Screen/Casing Type PVC

Screen/Casing Diameter 2" Screen Length 15' Casing Length 10'



| Depth (feet) | Well As-built Detail | Notes | Sample Number | Description of Soil Classification (Color, Texture, Structures) |
|--------------|----------------------|---------------------|--------------------|---|
| - | | Stick-Up Well Cover | | 0-15' BRN. FINE SAND w/ SILTS + MINOR CLAY |
| -5 | | Casing | SS-1 10.19.8.10 | 15-17 BRN SILTS w/ FINE SAND + COBBLES |
| -7.5 | <i>SAND TO 9'</i> | Screen | NO PID READINGS | 17-25 SAME AS 15-17' |
| -10 | <i>7-9'</i> | | NO UDDOR | |
| -15 | | | | |
| -20 | | Bottom of Borehole | | |
| -25 | | | | |
| -30 | | | | |

Drilling Log

Harper Environmental Associates

Well Number MW 2

1811 Hale Hollow Road, Bridgewater Corners, VT (802) 672-6112 fax (802) 672-6227

Project STC LND. Owner P. SIMONS Date Drilled 5.12.04

Location BRATTLEBORO Drilling Co. T+K DRILLING Method HS ABEE

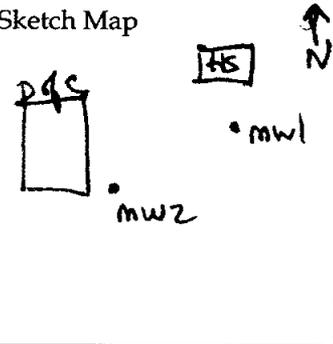
Drilled by — Logged by CH Diameter 4.25

Total Depth of Borehole 20' Surface Elevation — Slot Size 0.010

Water Level, initial ~13' 24 hrs. — Screen/Casing Type PVC

Screen/Casing Diameter 2" Screen Length 10' Casing Length 10'

Sketch Map



| Depth (feet) | Well As-built Detail | Notes | Sample Number | Description of Soil Classification (Color, Texture, Structures) |
|--------------|----------------------|---------------------|--------------------------|---|
| - | | Stick-Up Well Cover | | 0'-13' LT BRN. FINE SAND w/ SILT (SILICA + GRAY CLAY) |
| -5 | | | SS-2 | 13-15' GRAVEL LAYER AT 13' |
| -7.9 | | | 21-18-13-28 | PUSH STONE - NO SAMPLE |
| -10 | | | NO PID READINGS OR ODORS | 15-20' SAME AS 0-13' |
| -15 | | | | |
| -20 | | | | |
| -25 | | | | |
| -30 | | | | |

Drilling Log

Harper Environmental Associates

Well Number MW3

1811 Hale Hollow Road, Bridgewater Corners, VT (802) 672-6112 fax (802) 672-6227

Project STC Owner P. SIMONS Date Drilled 5.12.04

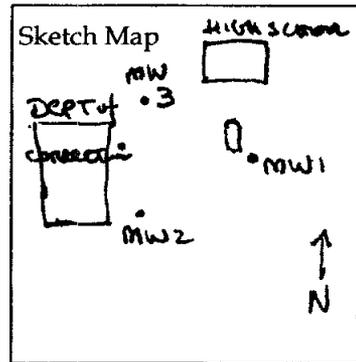
Location BRATTLEBORO Drilling Co. T+K Method HS AUREA

Drilled by JM Logged by CH Diameter 4+

Total Depth of Borehole 20' Surface Elevation — Slot Size .010"

Water Level, initial -13' 24 hrs. Screen/Casing Type PVC

Screen/Casing Diameter 2" Screen Length 10' Casing Length 10'



| Depth (feet) | Well As-built Detail | Notes | Sample Number | Description of Soil Classification (Color, Texture, Structures) |
|-----------------|----------------------|------------------------|---------------|---|
| - | | Flush-mounted Road Box | | 0-4' BRN. FINE SAND w/ SILT |
| - | | | | AT 4' 8" GRAVEL LENS |
| -5 | | | | 5-10 BRN. FINE SAND w/ SILT |
| - | | | | 10-12 SAND + GRAVEL, QUARTZITE SUBANGULAR |
| -7-9 rest water | | | | 12-20 BRN. FINE SAND w/ SILT |
| -10 | | | | |
| - | | | | |
| -15 | | | | |
| - | | | | |
| -20 | | | | |
| - | | | | |
| -25 | | | | |
| - | | | | |
| -30 | | | | |

SS-3
14.27.19.23

NO ODOMS
OR PID
READINGS

Drilling Log

Harper Environmental Associates

Well Number MW4

1811 Hale Hollow Road, Bridgewater Corners, VT (802) 672-6112 fax (802) 672-6227

Project STC INDUSTRIAL Owner P. SIMONS Date Drilled 5-12-04

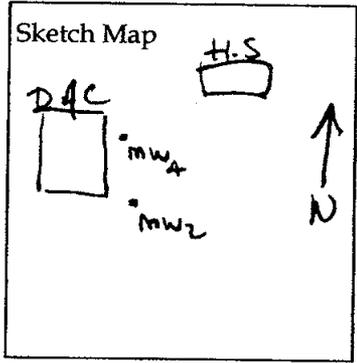
Location BRATTLEBORO Drilling Co. THE DRILLER Method H.S. AUGER

Drilled by Logged by CH Diameter 4.25

Total Depth of Borehole 20' Surface Elevation Slot Size .010"

Water Level, initial ~13 24 hrs. Screen/Casing Type PVC

Screen/Casing Diameter 2" Screen Length 10' Casing Length 10'



| Depth (feet) | Well As-built Detail | Notes | Sample Number | Description of Soil Classification (Color, Texture, Structures) |
|--------------|--|-------|---------------|---|
| - | <p>Flush-mounted Road Box</p> <p>Casing Sand to 9'</p> <p>Screen</p> <p>Bottom of Borehole</p> | | | 0-5' BROWN FINE SAND w/ SILT |
| - | | | | 5-7' SAND, MEDIUM |
| - | | | | 7-9' BROWN F. SAND |
| -5 | | | | 9' GRAVEL LENS (~10") |
| - | | | | 10-12 BRN FINE SAND |
| - | | | | 12-14 NO RECOVERY, STONE W/ |
| -10 | | | | 14-20' BONEY DRILLING |
| - | | | | BRN. FINE SAND w/ GRAVEL |
| - | | | | SS-4 |
| - | | | | 9.9.7.4 |
| - | | | | NO PID READINGS OR ODORS |
| -15 | | | | |
| - | | | | |
| -20 | | | | |
| -25 | | | | |
| -30 | | | | |

LIMITATIONS

1. The observations described in this report were made under the conditions stated therein. The conclusions presented were based solely upon the services described, and not on scientific procedures which were beyond the scope of described services or the time and budgetary constraints imposed by the Client. Where access to portions of the Site or to structures on the Site was unavailable, or was not an Area of Concern, Harper Environmental renders no opinion as to the presence of oil or hazardous material in that portion of the Site or structure.
2. Certain information provided by State or local officials, as well as other parties herein referenced, was used to develop this report. The accuracy or completeness of the information provided by these sources was not independently verified.
3. Harper Environmental did not perform testing or analyses to determine the presence or concentrations of asbestos, radon, lead paint, or UFFI at the Site or in the environment at the Site, unless otherwise stated. Air quality sampling and PCB analyses were also not conducted as part of this project, unless otherwise stated.
4. This report assessed the physical characteristics of the subject Site with respect to the presence of oil or hazardous material. Compliance of present or past owners or operators with any federal, state or local laws and regulations was not verified.
5. The conclusions and recommendations contained in this report are based in part, where noted, upon the data obtained from a limited number of soil and/or groundwater samples obtained from widely spaced subsurface explorations. The nature and extent of variations between these explorations may not become evident until further exploration. Additionally, variations in the types and concentrations of contaminants and variations in their flow path may occur due to seasonal water table fluctuations, past disposal practices, the passage of time, and other factors. Harper Environmental reserves the right to modify the conclusions of this report should further information become available.
6. Any water level readings made in test pits, borings, and/or observation wells were made at the times and under the conditions stated in the report. However fluctuations in the level of groundwater due to variations in rainfall and other factors different from those prevailing at the time measurements were made.
7. Except as noted within the text of the report, no quantitative laboratory testing was performed as part of the site assessment. Where quantitative laboratory testing has been conducted by an outside laboratory, Harper Environmental has relied on the data provided and has not conducted an independent evaluation of the reliability of the data.
8. Chemical analyses have been performed for specific constituents during the course of the site assessment, as described in the report. However, additional chemical constituents not searched for during the current study may be present in soil and/or groundwater at the Site.

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