

# **PHASE I ENVIRONMENTAL SITE ASSESSMENT**

**382-394 Grand Avenue  
New Haven, Connecticut**

**February 2020**

Ref. No. 105285R01

*Prepared for:*

New Haven Bank  
299 Whalley Avenue  
New Haven, CT 06511

*Prepared by:*



**TRITON ENVIRONMENTAL, INC.**  
*Environmental Consulting & Engineering*

385 Church Street, Suite 201, Guilford, Connecticut 06437 • Phone 203.458.7200 Fax: 203.458.7201

## TABLE OF CONTENTS

1.0 - PURPOSE, SCOPE OF SERVICES, AND EXCEPTIONS TO ASTM E 1527-13 .....	1
1.1 - Purpose .....	1
1.2 - Scope of Services .....	2
1.3 - Exceptions to ASTM E 1527-13 .....	2
2.0 - SITE DESCRIPTION AND PHYSICAL SETTING .....	3
2.1 - Location and Legal Description .....	3
2.2 - Site and Vicinity Description .....	3
2.3 - Current Uses of the Site .....	3
2.4 - Description of Existing Structures and Improvements .....	4
2.5 - Current Heating Source .....	4
2.6 - Historical Heating Source(s) .....	4
2.7 - Sanitary Waste Disposal Methods (Current and Past) .....	5
2.8 - Potable Water Supply .....	5
2.9 - Current Surrounding Land Use .....	5
2.10 - Geologic and Hydrogeologic Setting .....	5
3.0 - USER-PROVIDED INFORMATION .....	7
4.0 - HISTORICAL SITE SUMMARY .....	8
5.0 - RECORDS REVIEW .....	11
5.1 - Records Pertaining to the Subject Site .....	12
5.2 - Records for Nearby Properties .....	12
5.3 - Manual Records Review .....	12
5.3.1 - DEEP Manual Records Review – Subject Site .....	13
5.3.2 - DEEP Manual Records Review – Adjacent Properties .....	13
5.3.3 - Municipal Manual Records Review .....	14
5.4 - Physical Setting Sources .....	15
6.0 - SITE RECONNAISSANCE .....	16
6.1 - General Site Setting .....	16
6.2 - Site Visit Findings .....	17
6.2.1 - Hazardous Wastes .....	17
6.2.2 - Petroleum Products .....	17
6.2.3 - Underground Storage Tanks .....	17
6.2.4 - Aboveground Storage Tanks .....	17
6.2.5 - Other Suspect Containers .....	17
6.2.6 - Materials/Equipment Likely to Contain PCBs .....	18
6.2.7 - Interior Staining Corrosion .....	18
6.2.8 - Discharge Features .....	18
6.2.9 - Pits, Ponds and Lagoons .....	18
6.2.10 - Solid Waste Dumping/Landfills .....	18
6.2.11 - Evidence of Fill Deposition .....	18
6.2.12 - Stained Soil/Stressed Vegetation .....	18
6.2.13 - Wells .....	18

**TABLE OF CONTENTS (continued)**

6.2.14 - Other..... 19  
6.3 - Limiting Conditions ..... 19  
7.0 - INTERVIEWS..... 20  
    7.1 - Interview with Site Owner ..... 20  
8.0 - OTHER NON-SCOPE ENVIRONMENTAL CONSIDERATIONS..... 22  
    8.1 - Asbestos-Containing Materials ..... 22  
    8.2 - Lead-Based Paint ..... 23  
    8.3 - Polychlorinated Biphenyls ..... 23  
    8.4 - Radon ..... 23  
    8.5 - Wetlands ..... 24  
    8.6 - Microbial Contamination (Mold)..... 24  
9.0 - TRANSFER ACT STATUS ..... 25  
10.0 - PRELIMINARY CONCEPTUAL SITE MODEL..... 27  
    10.1 - Potential Receptors..... 30  
    10.2 - Preliminary Ecological Risk Assessment..... 30  
    10.3 - Other Environmental Considerations ..... 30  
11.0 - FINDINGS, CONCLUSIONS AND RECOMMENDATIONS..... 31  
    11.1 - Findings and Conclusions ..... 31  
    11.2 - Data Gaps ..... 32  
    11.3 - Recommendations ..... 32  
12.0 - REFERENCES..... 34  
13.0 - LIMITATIONS..... 35  
14.0 - QUALIFICATIONS STATEMENT..... 37  
15.0 - SIGNATURES OF REPORT AUTHORS AND DECLARATION OF ENVIRONMENTAL PROFESSIONAL..... 38

## **TABLE OF CONTENTS (continued)**

### **FIGURES**

- Figure 1 Site Location Map
- Figure 2 Site Plan Showing Identified Areas of Concern

### **APPENDICES**

- Appendix A User Provided Information
- Appendix B Historical Research Information
- Appendix C Electronic Database Report
- Appendix D Regulatory Records
- Appendix E Site Photographs and Reconnaissance Checklist
- Appendix F Interview Form
- Appendix G Selected Resumes

## **1.0 - PURPOSE, SCOPE OF SERVICES, AND EXCEPTIONS TO ASTM E 1527-13**

Triton Environmental, Inc. (Triton) was retained by New Haven Bank to conduct a Phase I Environmental Site Assessment (ESA) of the four contiguous properties collectively known as 382-394 Grand Avenue in New Haven, Connecticut (the "site").

The Phase I ESA was conducted in general accordance with the American Society of Testing and Materials (ASTM) "*Standard Practice for Environmental Site Assessments: Phase I Environmental Site Assessment Process, E 1527-13*", the United States Environmental Protection Agency (USEPA) All Appropriate Inquiry (AAI) Final Rule (40 CFR Part 312) as well as the Connecticut Department of Energy and Environmental Protection (DEEP) *Site Characterization Guidance Document* (September 2007, Revised December 2010). The work was completed in accordance with the terms, conditions, and limitations of Triton's proposal dated January 21, 2020, which was executed on January 21, 2020.

### **1.1 - Purpose**

The primary purpose of the Phase I ESA was to evaluate the current and historical conditions of the subject site in an effort to identify potential environmental concerns associated with the site.

A recognized environmental condition (REC) is defined by ASTM as:

*"the presence or likely presence of any hazardous substances or petroleum products in, on, or at a property: (1) due to release to the environment; (2) under conditions indicative of a release to the environment; or (3) under conditions that pose a material threat of a future release to the environment. De minimis conditions are not recognized environmental conditions."*

The DEEP Site Characterization Guidance Document defines an area of concern (AOC) as:

*"locations or areas at a site where hazardous waste and/or hazardous substances (including, but not limited to, petroleum products) have been or may have been used, stored, treated, handled, disposed, spilled, and/or released to the environment."*

The identification of RECs or AOCs in connection with the site may impose an environmental liability on owners or operators of the site, reduce the value of the site, or

restrict the use or marketability of the site, and therefore, further investigation may be warranted to evaluate the scope and extent of potential environmental liabilities. The specific purpose for completing the Phase I ESA is further identified in Section 3.0.

### **1.2 - Scope of Services**

The scope of work for this Phase I ESA was designed to generally conform with ASTM Standard E 1527-13 for performing Phase I ESAs for real estate transactions, the USEPA AAI Final Rule, as well as the DEEP *Site Characterization Guidance Document*.

The scope of work for this assessment included the following:

1. an inspection of accessible portions of the site by Triton;
2. an interview with the property owner (Mr. Zeynullah Yeroz);
3. a visual inspection (from public areas) of properties within 500 feet of the site;
4. a review of municipal, state and federal USEPA regulatory records (see Section 6.0); and
5. a review of available historical aerial photographs, Sanborn Fire Insurance Maps (if available), USGS historical topographic maps, and historic city directories.

### **1.3 - Exceptions to ASTM E 1527-13**

This Phase I ESA was completed in accordance with the requirements outlined in ASTM E 1527-13 with the following exception: a title report was not provided to Triton by the user/client. As such, Triton could not review the title report to ascertain whether environmental liens or environmental land use restrictions are recorded for the site.

## 2.0 - SITE DESCRIPTION AND PHYSICAL SETTING

### 2.1 - Location and Legal Description

The subject site consists of four contiguous parcels that are located southwest of the intersection of Grand Avenue and James Street. Information obtained from the City of New Haven municipal offices indicated the following addresses and tax assessment parcel numbers for the site:

Address	Map/Block/Lot	Other Known Addresses	Lot Size (sq ft)	Description
382 Grand Avenue	173/0746/02500	384 Grand Avenue 386 Grand Avenue	7,888	Mixed use commercial (restaurant and pharmacy) and residential building.
388 Grand Avenue	173/0746/02400	None	3,600	Parking lot
390 Grand Avenue	173/0746/02300	392 Grand Avenue	3,100	Parking lot
394 Grand Avenue	173/0746/02200	396 Grand Avenue	4,753	Parking lot

Every known address for the site was researched as part of Triton's records review (see Section 5.0).

### 2.2 - Site and Vicinity Description

The subject site consists of four contiguous parcels that total approximately 0.44 acres. A mixed use commercial/residential building is located on the eastern portion of the site. The ground surface at the site is level. Ground cover throughout the site generally consists of a combination of gravel and paved parking. Concrete sidewalks associated with Grand Avenue and James Street are present along the north and west boundaries of the site, respectively.

The area surrounding the site is urban and consists largely of residential properties. Fair Haven Community Health Care is located east of the site.

### 2.3 - Current Uses of the Site

The four story site building is currently used for both commercial and residential purposes. Avellino's Pizza, New Haven Pharmacy, and a small office used by the site owner

are located on the first floor. The three above floors contain residential apartments that are each occupied.

The remainder of the site is used for parking of customer and tenant vehicles.

#### **2.4 - Description of Existing Structures and Improvements**

The site contains an approximately 14,000 square-foot (gross area) four story commercial/residential building on the eastern portion of the site. The building is of wood frame construction with vinyl exterior siding. The interior walls of the building are reportedly constructed of a combination of plaster and drywall. The foundation of the building consists of a field stone basement that largely spans the entire footprint. The rear portion of the building appears to be an addition that was constructed on a poured concrete slab.

#### **2.5 - Current Heating Source**

Natural gas is supplied to the site. New Haven Pharmacy and each residential apartment are reportedly equipped with natural gas-fired furnaces. Avellino's Pizza is not equipped with a heating system.

#### **2.6 - Historical Heating Source(s)**

Municipal records indicated that the current site building was historically heated with coal. In addition, former site building(s) at "392/394/396 Grand Avenue" were historically heated with oil that was supplied from a 275-gallon tank.

It should be noted that records regarding historical sources of heat for the current and former site buildings were limited. As such, the date of operation of the identified former heating systems, as well as their former location(s), is unknown. In addition, records were not observed regarding the use of other heating systems at the site, including those associated with other former site buildings.



## 2.7 - Sanitary Waste Disposal Methods (Current and Past)

Sanitary wastes are discharged to the municipal sewer system. Records regarding historical on-site septic systems were not observed during the completion of the Phase I ESA.

## 2.8 - Potable Water Supply

The site is connected to the municipal water supply system.

## 2.9 - Current Surrounding Land Use

The table below summarizes the land usage of the properties which abut the subject site.

Current Surrounding Land Use	
Direction	Description
North	Residential apartments
East	Fair Haven Community Health Care
South	Residential dwellings
West	Residential dwellings

## 2.10 - Geologic and Hydrogeologic Setting

Triton has reviewed readily available maps regarding the geologic and hydrogeologic setting of the site. Pertinent information is summarized in the table below.

Geologic and Hydrogeologic Information Summary	
Item	Description
<b>Mapped Surficial Geologic Unit<sup>1</sup></b>	The surficial geology at the site consists of sand and gravel overlying sand overlying fines.
<b>Mapped Bedrock Geologic Unit<sup>2</sup></b>	Bedrock underlying the site consists of New Haven Arkose consisting of red to brown, medium- to coarse-grained, sandstone-like, sedimentary rock containing quartz, feldspar, and rock fragments. It is the most common sedimentary rock of the central lowlands; locally known as brownstone.
<b>Wetlands<sup>3</sup></b>	According to the Inland Wetlands and Watercourses Map, wetlands and watercourses are not present at the site.
<b>Groundwater Classification<sup>4</sup></b>	Groundwater at the site is classified as GB. Class GB groundwater is designated for industrial process water and cooling waters; base flow for hydraulically connected surface water bodies; and presumed not suitable for human consumption without treatment.
<b>Nearest Surface Water Body<sup>5</sup></b>	The nearest surface water body is Mill River located approximately 800 feet west of the site.

<b>Geologic and Hydrogeologic Information Summary</b>	
<b>Item</b>	<b>Description</b>
<b>Topography</b> <sup>5</sup>	The site is located at an elevation approximately 30 feet above sea level and is flat. The topography in the vicinity of the site is slightly sloped downward to the west.
<b>Inferred Direction of Shallow Groundwater Flow</b> <sup>5</sup>	Based on the topography, the inferred direction of groundwater flow is to the west towards Mill River. However, the site is located in close proximity to Quinnipiac River, Mill River, and New Haven Harbor, which are tidally influenced. As such, groundwater flow may vary given the tide.

<sup>1</sup>Based on Surficial Materials Glacial and Postglacial Deposits Map of New Haven, Connecticut (DEEP, August 2009).

<sup>2</sup>Based on Bedrock Geology Map of Connecticut, (Rodgers, 1985)

<sup>3</sup>Based on City of New Haven Inland Wetlands and Watercourses Map (November 16, 1988). Triton has not completed a formal wetland survey at the site.

<sup>4</sup>Based on Water Quality Classifications Map of New Haven, Connecticut (DEEP, October 2018)

<sup>5</sup>Source: Based on topography from USGS Quadrangle map (see Figure 1).

### 3.0 - USER-PROVIDED INFORMATION

During the completion of this Phase I ESA, Triton requested certain “User”-provided information pertaining to the subject property from New Haven Bank (the “User” of the Phase I report as defined by ASTM E 1527-13). The following table summarizes user-provided information (if any) regarding the subject site, which is also documented on the questionnaire provided in Appendix A.

User-Provided Item	Information Provided
Title Records	A title report was not provided.
Environmental Liens or Activity and Use Limitations	A title report was not provided, and as such, the presence/absence of environmental liens or use restrictions could not be verified.
Specialized Knowledge	Information was not provided.
Commonly Known or Reasonably Ascertainable Information	Information was not provided.
Valuation Reduction for Environmental Issues	The User is not aware of any reduction in value of the property for environmental issues.
Owner, Property Manager, and Occupant Information	According to Tax Assessor records, the site is owned by Zeynullah Yeroz.  The site is occupied by Avellino’s Pizza, New Haven Pharmacy, and residential tenants.
Previous Environmental Reports	Previous environmental reports were not provided to Triton by the User.
Reason for Performing the Phase I ESA	Due diligence evaluation of site prior to potential purchase.
Other	The User provided Triton with an appraisal for the site dated January 4, 2017. Information regarding environmental concerns was not provided on the appraisal.

#### 4.0 - HISTORICAL SITE SUMMARY

During the completion of this Phase I ESA, Triton attempted to determine the past uses of the site by reviewing readily available historical data and conducting interviews with persons familiar with the site. Source data used to determine the site history include aerial photographs (1934, 1949, 1951, 1959, 1963, 1966, 1972, 1980, 1985, 1991, 1995, 2005, 2008, 2012, and 2016) provided by Environmental Data Resources (EDR); available municipal and state documentation, historical city directories from (1936 to 2019); Sanborn Fire Insurance Maps from the years (1886, 1901, 1924, 1950, 1973); and historical topographic maps (1943, 1954, 1967, 1984, and 2018). Copies of these historical sources are included in Appendix B. A summary of the interview(s) with persons familiar with the site is included in Section 7.0. The following provides a brief summary of the site history based on the above information reviewed:

Based on review of Sanborn Fire Insurance maps (Sanborn maps), the site was undeveloped in 1886. However, the area surrounding the site appeared to have been developed with dwellings and stores. According to available municipal records, the current site building on the 382 Grand Avenue parcel and the former building on the 394 Grand Avenue parcel were constructed in 1900. The Sanborn maps indicated that by 1901 another building was constructed on the 390 Grand Avenue parcel and a series of buildings were constructed on the 388 Grand Avenue parcel. Stables were also constructed on the rear portions of the 382 and 388 Grand Avenue parcels. The 388 Grand Avenue parcel also contained a wood yard and the southernmost building on this parcel contained an apparent vertical steam boiler. The site use at the time appeared to be primarily commercial with the buildings on the 382, 390, and 394 Grand Avenue parcels identified as containing stores. It is also likely that, based on historical city directories and the configuration of the current site building, that the buildings were also used for residential purposes and contained apartments above the indicated stores.

Based on a review of Sanborn maps, aerial photographs, and municipal records, the site appeared to be largely unchanged from the early 1900s to the 1980s, with the exception of the construction of automobile garages at the rear of the 382 and 394 Grand Avenue parcels and a building addition at the rear of the 390 Grand Avenue parcel by 1950. In addition, it appeared

that the former structures on the 388 Grand Avenue parcel were replaced or reconfigured sometime between 1901 and 1924 into a store building on the northern portion of the parcel and storage buildings on the southern portion of the parcel. On the 1924 Sanborn map, one of the storage buildings was labeled as being dilapidated. The storage buildings appeared to have been razed by 1950. By the late 1980s, the buildings on the 388, 390, and 394 Grand Avenue parcels and the automobile garage on the 382 Grand Avenue parcel were razed. The 388, 390, and 394 Grand Avenue parcels were reconfigured into a parking lot for the site. Since that time to present that site has remained largely unchanged.

Based on a review of historical city directories and municipal records, occupants of the site have largely been residential in nature; however, the following apparent commercial type occupants were identified:

382 Grand Avenue (aka 384 and 386 Grand Avenue)

- Cronin T C Restaurant (approximately 1936)
- DeMitteo P Trucking (approximately 1936)
- Marra G E Tavern (approximately 1941)
- Barbato M Mrs Restaurant (approximately 1946)
- Delucia C Restaurant (approximately 1951 through 1956)
- Palm Beach Apizza & Restaurant (approximately 1967 through 1996)
- Pizza Parlor (approximately 1985)
- Avellino's Apizza (approximately 2001 to current)
- Kennedy Fried Chicken (approximately 2006 through 2011)
- Hancock Pharmacy (approximately 2013)
- New Haven Pharmacy (approximately 2012 to current)
- A D M H L Investment LLC (approximately 2019)
- Zino's Pizza (date unknown)

388 Grand Avenue

- Rascatti F E Meat/Grocer (approximately 1941 through 1956)
- Rossetti A Cleaner (approximately 1961)
- Community Progress, Inc. (approximately 1967)
- American Cleaning and Decorating Painters (approximately 1971)
- Fair Haven Community Health Clinic, Inc. (approximately 1974 through 1976)

390 Grand Avenue (aka 392 Grand Avenue)

- Ursini J V Plumber (approximately 1936 through 1946)
- Fusco L A Barber (approximately 1936)

- Windsor Furniture and Decorators (approximately 1961)
- Stanton Furniture Co. (approximately 1966 through 1967)
- Community Progress, Inc. (approximately 1968 through 1972)
- Gonzalez Louis Furniture (approximately 1974)
- Fair Haven Parent Ministry (approximately 1976)

394 Grand Avenue (aka 396 Grand Avenue)

- Grand Cooperative Store Grocers (approximately 1936 through 1951)
- Musco V A Druggist/Pharmacy (approximately 1936 through 1966)
- Rossetti A Cleaner (approximately 1956)
- Arnold Amusement Company (approximately 1961 through 1975)
- Arnold Cigarette Co. Inc. (approximately 1966 through 1971)
- Wil-Mor Pharmacy (approximately 1967 through 1972)
- Editorial America (approximately 1974)
- Garage 2 Amusements (approximately 1975)
- C.P.L. Office (date unknown)

The site is currently occupied by Avellino's Pizza, New Haven Pharmacy, and residential tenants.

## 5.0 - RECORDS REVIEW

Triton completed a records review in order to obtain and review records to help identify potential environmental concerns in connection with the site. The records reviewed and results are summarized in the following sections. The ASTM standard specifies both the *Standard Environmental Record Sources* as well as *Additional Environmental Record Sources* to be reviewed. The EDR report (which is attached as Appendix C) contains searches of both the standard and additional database sources in order to satisfy ASTM requirements within the search radii specified by the ASTM standard.

The *Standard Environmental Records Sources* required to be reviewed are as follows:

- NPL – National Priority Sites List
- Proposed NPL – Proposed National Priority Sites List
- NPL LIENS – Federal Superfund Liens
- Delisted NPL – National Priority List Deletions
- Federal Facility – Federal Facility Site information Listing
- RCRA-TSDF – RCRA Treatment, Storage, and Disposal Facilities
- RCRA-LQG – RCRA Large Quantity Generator
- RCRA-SQG – RCRA Small Quantity Generator
- US ENG Controls – Engineered Controls Site List
- US INST Controls – Sites with Institutional Controls
- LUCIS – Land Use Control Information System
- ERNS – Emergency Response Notification System
- SWF/LF – Solid Waste Facility/Landfills
- Tribal LUST – Leaking Underground Storage Tanks on Indian Land
- AST – Marine Terminals and Tank Information
- Tribal UST – Underground Storage Tanks on Indian Land
- FEMA UST – Underground Storage Tank Listing
- Tribal VCP – Voluntary Cleanup Priority Listing

The search radii used for each of the above databases varies, according to the ASTM standard.

To enhance and supplement the *Standard Environmental Record Sources* listed above, local records and/or additional federal, state, or tribal records are checked when, in the judgment of the environmental professional, such additional records are: (1) reasonably ascertainable, and (2) sufficiently useful, accurate, and complete in light of the objective of the records review.

Information from these supplemental sources is included from both reviewing the electronic databases provided in the EDR report, as well as through manual records reviews.

It should be noted that plotted locations of listed sites are not always accurate. With regard to listings that are determined or suspected to be inaccurate, based on information from other sources such as direct observation or consultation with individuals familiar with the site, Triton uses the best available data when evaluating the location of listed sites discussed below. The records also often pertain to properties that are out of business or no longer present in the site vicinity.

The following sections provide a summary of the findings of the environmental database review.

### **5.1 - Records Pertaining to the Subject Site**

The subject site was not identified in any of the Federal, State, or Tribal record sources (see Appendix C).

### **5.2 - Records for Nearby Properties**

One or more nearby properties were identified in either the *Standard Environmental Record Sources* or *Additional Environmental Record Sources* within the ASTM search radii of the EDR report (as shown on the EDR Overview and Detail Maps). Please refer to the database report in Appendix C for a full listing of the records identified for the nearby properties and the databases in which the properties were identified.

### **5.3 - Manual Records Review**

In accordance with ASTM E 1527-13, if the site or any of the adjoining properties is identified on one or more of the *standard environmental record sources*, pertinent regulatory files and/or records associated with the listing should be reviewed. The purpose of the regulatory file review is to obtain sufficient information to assist the environmental professional in determining if a recognized environmental condition, historical recognized environmental condition, controlled recognized environmental condition, or a de minimis condition exists at the property in connection with the listing.



If, in the environmental professional's opinion, such a review is not warranted, the environmental professional must explain in the report the justification for not conducting the regulatory file review.

It should be noted that at the time of Triton's file review, certain electronic databases were not available for review, including the 2008 to present hazardous waste manifest database and the scanned spill report database. Triton was able to review the 1984 to 2008 hazardous waste database and supplemental spill report databases that dated between 1972 to current. However, given the volume of spill records and outdated status of these available databases, Triton cannot guarantee their accuracy.

#### **5.3.1 - DEEP Manual Records Review – Subject Site**

Triton conducted a manual review of available files at the DEEP Public File Room in Hartford, Connecticut. During Triton's manual file review, records regarding the subject site were not identified.

#### **5.3.2 - DEEP Manual Records Review – Adjacent Properties**

The Fair Community Health Care Center, located east of the site at 362 and 374 Grand Avenue, was identified in the EDR report. In addition, the intersection of Grand Avenue and James Street, which is located northwest and adjacent to the site, was also identified in the EDR report. Triton conducted a manual review of available files at the DEEP Public File Room in Hartford, Connecticut for these locations. In addition, Triton completed a cursory review of other adjacent properties that were not identified in the EDR report.

Two records of releases were identified for the intersection of Grand Avenue and James Street, including a release of five gallons of antifreeze from a motor vehicle accident that occurred on August 26, 2003 and a release of raw sewage on January 25, 2013. These releases are identified as closed by the DEEP. Copies of these records are provided in Appendix D.

### **5.3.3 - Municipal Manual Records Review**

Triton visited the City of New Haven offices on January 22, 2020 in an attempt to identify available and accessible environmental records pertaining to the subject site, including the Assessor's Department, City Clerk, Building Department, City Plan Department, Bureau of Environmental Health, and Fire Department. At the time of the file review, Triton was unable to review records maintained by the Bureau of Environmental Health. Triton submitted Freedom of Information Act (FOIA) request to review files and to date has not received a response. If information is provided that changes the conclusions presented in this Phase I ESA, then Triton will prepare an addendum report. Information obtained at the City of New Haven municipal offices included past and present Tax Assessor card information, tax map, and recent deed for the site. The following records of interest were identified at the Town offices: Copies of these documents are provided in Appendix D.

#### *Tax Assessor*

The property cards for 382 Grand Avenue indicated that the site building was constructed in 1900. The current property card indicated that the fuel source for the site building is "gas/oil." At the time of the site reconnaissance, Triton observed natural gas connections and associated heating systems. Oil-fired heating equipment, including boilers/furnaces and tanks were not observed.

The historical property card for 388 Grand Avenue indicated that a former site building was razed in 1977.

The historical property card for 394 Grand Avenue indicated that a former store and garage were razed in 1984.

#### *Building Department*

An application and permit to construct a three car garage at 394-396 Grand Avenue, dated February 2, 1949, were obtained from the City of New Haven Building Department

An application and permit to demolish a three story residential wood structure at 394-396 Grand Avenue, dated March 1984, were obtained from the City of New Haven Building Department.

#### Fire Department

A building record card for 382/384/386 Grand Avenue was obtained from the City of New Haven Fire Department. According to the record card, the site building was historically heated with coal. Inspection notes on the back of the card indicated that after-hours burning was being completed at the site. The nature of this burning was not indicated on the record card.

A building record card for 390 Grand Avenue was obtained from the City of New Haven Fire Department. The record card indicated that the former building on this parcel was demolished by March 20, 1980.

A building record card for "392/394/396 Grand Avenue" was obtained from the City of New Haven Fire Department. According to the record card, the former building(s) on this parcel was heated with oil that was supplied from a 275-gallon tank.

#### **5.4 - Physical Setting Sources**

Several physical setting sources were reviewed for the subject site. These include the USGS 7.5 minute topographic map (Figure 1) and additional sources provided in "Physical Source Setting Summary" of the EDR report (Appendix C). Pertinent information regarding the physical setting of the site is summarized in Section 2.0.

## **6.0 - SITE RECONNAISSANCE**

The site reconnaissance was conducted on January 22, 2020 by Mark Paulsson, Project Manager of Triton, accompanied by Mr. Zeynullah Yeroz, the current owner of the site. A summary of the site inspection findings and limiting conditions (if any) is presented below. Site photographs and the site reconnaissance checklist are included in Appendix E.

### **6.1 - General Site Setting**

The approximately 0.44 acre site contains an approximately 14,000 square-foot four story commercial/residential building on the eastern portion of the site. The building is of wood frame construction with the exterior walls comprised of vinyl siding. The building is largely constructed over a field-stone basement, except for an apparent rear addition that is constructed on top of a grade-level poured concrete slab. The first floor of the building contains Avellino's Pizza and New Haven Pharmacy within the west and east portions, respectively. An office that is reportedly used by the site owner is located within the southwest portion of the building. This portion of the building appeared to have been used for restaurant purposes based on the presence of a not-in-service walk-in refrigerator. A currently in-service walk-in refrigerator is located within Avellino's Pizza.

The second and third floors of the site building each contain two residential apartments units. The fourth floor of the site building contains a single residential apartment unit. The basement is currently used for storage and contains the natural gas meters and water heaters. The basement was reportedly previously used for residential purposes and contained a single apartment unit that consisted of several bedrooms, bathrooms, and kitchen. Portions of the interior walls and floors of the basement were gutted due to a reported sewer backup.

The ground surface at the site is level. Groundcover consists of a combination of asphalt-pavement and gravel. Concrete sidewalks are located along the north and west site boundaries.

The site limits are generally defined by a chain link fencing along the northern, western and southern boundaries. The eastern exterior wall of the site building is generally located

along the eastern boundary. The subject site is accessed from the north via an entrance from Grand Avenue.

## **6.2 - Site Visit Findings**

The following sections provide a summary of the site visit findings.

### **6.2.1 - Hazardous Wastes**

Based on the site inspection, it does not appear that hazardous waste is currently generated at the site. New Haven Pharmacy reportedly generates limited quantities of expired medicine.

### **6.2.2 - Petroleum Products**

A small gasoline container (capacity less than 5 gallons) was observed within the rear office portion of the site building.

### **6.2.3 - Underground Storage Tanks**

Evidence of current or former underground storage tanks (USTs) was not identified during site reconnaissance. However, Triton observed disconnected piping penetrations through the north wall of the basement. The purpose of this piping could not be confirmed at the time of the site reconnaissance.

### **6.2.4 - Aboveground Storage Tanks**

Aboveground storage tanks (ASTs) were not observed during the site inspection.

### **6.2.5 - Other Suspect Containers**

A 55-gallon polyethylene drum was observed along the south exterior wall of the site building. The drum appeared to contain a minor amount of liquid. Labeling identifying the contents of the drum was damaged and was not legible. According to the site owner, the drum previously stored plant food that was used for a garden that was once present at the site.

#### **6.2.6 - Materials/Equipment Likely to Contain PCBs**

The potential for polychlorinated biphenyl (PCB)-containing building materials to be present in the site building(s) is discussed in Section 8.3. Other than the potential for PCB containing building materials and fluorescent light fixtures, equipment likely to contain PCBs was not observed during the site inspection.

#### **6.2.7 - Interior Staining Corrosion**

Staining indicative of a release was not noted during the site inspection.

#### **6.2.8 - Discharge Features**

Discharge features were not observed at the site.

#### **6.2.9 - Pits, Ponds and Lagoons**

Pits, ponds or lagoons were not observed at the site.

#### **6.2.10 - Solid Waste Dumping/Landfills**

Readily apparent evidence of solid waste dumping or landfills was not identified on the subject property during the site reconnaissance.

#### **6.2.11 - Evidence of Fill Deposition**

Readily apparent evidence of filling was not identified on the subject property during the site reconnaissance. However, the presence of fill material is often not apparent from visual observations.

#### **6.2.12 - Stained Soil/Stressed Vegetation**

Stained soil or stressed vegetation was not observed on site during the site reconnaissance.

#### **6.2.13 - Wells**

Groundwater monitoring wells and potable water supply wells were not observed during the site reconnaissance.

#### **6.2.14 - Other**

Avellino's Pizza is equipped with a small grease trap that is connected to the commercial kitchen sink. A grease dumpster is located at the rear of the site building within the parking lot. The area surrounding the grease dumpster was covered in snow at the time of the site inspection, which limited the ability to observe the ground surface for staining.

Discarded solid debris, including a vehicle bumper and various cardboard, plastic, and wooden materials were observed at the rear of the 382 Grand Avenue parcel. Other materials may be present within this area that could not be viewed due to the presence of a brush and leaf pile.

#### **6.3 - Limiting Conditions**

Triton was not provided access to the second floor west apartment, the third floor east apartment, and a few rooms within the fourth floor apartment. In addition, thorough observations of the rear first floor office were limited due to the presence of clutter (e.g. automotive tires, trash cans, boxes, etc.). These limitations do not appear to be significant due to the known current and historical site uses.

At the time of the site reconnaissance, numerous vehicles were parked within the site parking lot. In addition, a coating of snow was present along the southern portions of the site. These conditions limited observations of the ground surface.

## 7.0 - INTERVIEWS

Triton completed interviews with the current site owner in order to obtain information regarding potential environmental concerns. Pertinent information from this interview is summarized in the section below. The interview form is included in Appendix F.

### 7.1 - Interview with Site Owner

At the time of the site reconnaissance, Triton interviewed Mr. Zeynullah Yeroz, the current owner of the site. Mr. Yeroz accompanied Triton for the majority of the site inspection and provided information regarding the site, which is largely summarized within this section and/or referenced throughout the report. Mr. Yeroz purchased that site in 2004 and since that time has acted as a landlord for the site occupants. According to Mr. Yeroz, the site building is supplied with natural gas for gas-fired furnaces located in each residential apartment and the New Haven Pharmacy space. Avellino's Pizza is not equipped with a heating system. Mr. Yeroz indicated that a former apartment that was located in the basement of the site building was heated with a natural gas-fired boiler system. This system had been removed sometime prior to Triton's site reconnaissance. According to Mr. Yeroz, the site is connected to the municipal water supply system and sewer system. Mr. Yeroz indicated that a sewage pipe overflow occurred last year that flooded portions of the basement and necessitated the removal of water damaged drywall.

Mr. Yeroz stated that the plastic 55-gallon drum observed on the south exterior of the site building was formerly stored plant food that was used for a garden that was once present at the site. Mr. Yeroz indicated that the former contents of the drum were completely used and that the limited volume of liquid within the drum is accumulated rainwater since the bung has been removed from the top of the drum.

Mr. Yeroz is unaware of environmental cleanups (with exception of sewage overflow), environmental cleanup liens, environmental issues associated with nearby properties, activity and use limitations, previous heating systems (including those associated with former buildings), past and present underground structures, hazardous building materials, and the generation and handling of hazardous waste.



According to Mr. Yeroz, environmental testing was previously completed at the site sometime between 2009 and 2012 as part of a refinance with Wells Fargo. Mr. Yeroz was not provided a copy of this report, but indicated that no environmental issues were found.

## **8.0 - OTHER NON-SCOPE ENVIRONMENTAL CONSIDERATIONS**

Although not within the scope of ASTM E 1527-13 or our contract with the Client, the following additional environmental topics are described for consideration.

### **8.1 - Asbestos-Containing Materials**

Asbestos-containing materials (ACM) began to be regulated by the USEPA in the 1970s with the promulgation of the Clean Air Act (CAA) and in the 1980s under the Toxic Substance Control Act (TSCA). The use of the most friable ACMs, including spray-applied asbestos for fireproofing and insulation as well as thermal system insulation and joint compound, was banned between 1973 and 1978 under the CAA. On July 12, 1989, USEPA issued a final rule banning most remaining ACM products. However, in 1991, this regulation was overturned by the Fifth Circuit Court of Appeals and as a result the ban was limited to flooring felt, rollboard, and corrugated, commercial, or specialty paper. Other uses of ACM, including, but not necessarily limited to, roofing felt, roof coatings, vinyl-asbestos floor tile, and certain asbestos cement shingles, are no longer subject to the 1989 TSCA ban.

Based on the lack of a complete ban on ACM, it is difficult to rule out the presence of ACM in a building solely based on its age. However, as a general rule, buildings constructed prior to the 1989 TSCA ban are more likely to contain ACM than those constructed after the 1989 TSCA ban (although stockpiles of building materials continued to be used after the date of the initial ban). Furthermore, asbestos containing materials continue to be manufactured outside of the U.S. and have the potential to be used in newer buildings. Where present in a friable condition, ACM can pose a health risk, can result in increased cost for building demolition and/or renovation, and can become released to surroundings soils.

Based on the age of the current site building (circa 1900), it is possible that ACM were used in the construction. However, Triton did not conduct an asbestos survey of the site building and therefore cannot offer any definitive conclusions regarding the presence or absence of asbestos.

## **8.2 - Lead-Based Paint**

Lead based paint (LBP) was banned in 1978 (although stockpiles of paint continued to be used after the date of the initial ban). Buildings constructed prior to 1978 may contain paint containing lead or other metals. The presence of LBP can create additional liabilities for properties that undergo renovation or demolition. In addition, deteriorating paint in structures can present a health risk through inhalation and/or ingestion of paint chips and metals contaminated dust. Lastly, the peeling/chipping of LBP on exterior surfaces of buildings can cause elevated concentrations of lead or other metals in the surficial soils located around the structure.

Given the age of the existing site building (circa 1900) and former buildings, it is possible that lead and other metals are present in paint at the site. However, Triton did not perform a specific LBP survey or sampling program and therefore, cannot offer any definitive conclusions regarding the presence or absence of lead or other metals in paint.

## **8.3 - Polychlorinated Biphenyls**

Prior to 1980, PCBs were used in a variety of applications including, but not limited to, paint formulations, rubber gaskets, caulks and other sealants, and dielectric fluids used in various electrical equipment. Where present, PCB containing building materials can pose health risks, can result in increased costs for renovation/demolition, and can also be released into adjacent building materials or exterior soils.

Given the age of the existing site building (circa 1900) and former buildings, it is possible that PCB containing building materials are present. Although a comprehensive inspection was not performed for the potential presence of PCBs (nor was analytical testing performed), Triton did note the presence fluorescent light fixtures that may be equipped PCB-containing ballasts.

## **8.4 - Radon**

Radon gas is a product of the decay series that begins with uranium. Radon is produced directly from radium, which can be commonly found in bedrock that contains black shale and/or granite. Radon gas can migrate through the ground and enter buildings through

porous concrete or fractures. Radon tends to accumulate in poorly ventilated basements. Long-term exposure to radon has been associated with lung cancer.

According to published information provided in the EDR report, the EPA Radon Zone for all of New Haven County is 1. A Zone 1 radon designation indicates that the indoor average level is greater than 4 pico Curries per liter (4 pCi/L). Radon test results for sites tested in New Haven were either less than 4 pCi/L (76.2% of sites tested) or greater than 4 pCi/L and less than 10 pCi/L (23.8% of sites tested).

Triton did not perform a radon analysis for this site and therefore, cannot offer any conclusions regarding the presence or absence of radon.

### **8.5 - Wetlands**

Based on the City of New Haven Inland Wetlands and Watercourses Map, wetlands are not mapped at the site. Triton has not conducted a formal wetland survey at the site to verify mapped information and cannot offer any conclusions regarding the presence or absence of wetlands or watercourses.

### **8.6 - Microbial Contamination (Mold)**

Triton did not perform a microbial contamination (mold) inspection and therefore offers no conclusions regarding the potential presence or absence of microbial contamination (mold) at the site. However, it should be noted that a sewer back-up reportedly occurred last year that flooded the basement of the site building. Portions of the interior drywall walls were removed as a result. Some apparent mold staining was observed on several sections of drywall in the basement.

## 9.0 - TRANSFER ACT STATUS

During the completion of this Phase I ESA, Triton attempted to determine whether the subject parcel meets the definition of an Establishment, as defined by the Connecticut Transfer Act.

An Establishment is defined by the Transfer Act any real property at which or any business operation from which (A) on or after November 19, 1980, there was generated more than one hundred kilograms of hazardous waste in any one month, (B) hazardous waste generated at a different location was recycled, reclaimed, reused, stored, handled, treated, transported or disposed of, (C) the process of dry cleaning was conducted on or after May 1, 1967, (D) furniture stripping was conducted on or after May 1, 1967, or (E) a vehicle body repair facility was located on or after May 1, 1967. "Establishment" does not include any real property or any business operation from which more than one hundred kilograms of hazardous waste was generated in any one month solely as a result of either:

- (i) The one-time generation of hazardous waste in any one month, as a result of either the first time such waste was generated or such a one-time generation since the last time a Form I, Form II, Form III or Form IV was required to be submitted; or
- (ii) One or more of the following:
  - (I) Remediation of polluted soil, groundwater or sediment;
  - (II) The removal or abatement of building materials or removal of materials used for maintaining or operating a building;
  - (III) The removal of unused chemicals or materials as a result of the emptying or clearing out of a building, provided such removal is supported by facts reasonably established at the time of such removal; or
  - (IV) The complete cessation of a business operation, provided the waste is removed not later than ninety days after such cessation and such cessation is supported by facts reasonably established at the time of such cessation;

Based on the information collected by Triton during the completion of this Phase I ESA, no direct evidence was identified that would suggest that the site meets the definition of an "Establishment" as defined by the Transfer Act. Although historical city directories identified a

potential dry cleaner at the site during the 1950s and 1960s (Rossetti A Cleaner), this occupant was not identified at the site in 1966, which is prior to the May 1, 1967 date for qualification of an Establishment.

Any final opinion as to whether a transaction is subject to the Transfer Act is a legal one, and advice of legal counsel is recommended.

## 10.0 - PRELIMINARY CONCEPTUAL SITE MODEL

Triton has reviewed available information regarding the history of the site, the known activities, which have been conducted on-site, and the available environmental data in order to develop a preliminary conceptual site model (CSM) in accordance with the DEEP Site Characterization Guidance Document.

Based on a review of available historical information, the site appeared to have been used for commercial and residential purposes since at least the early 1900s when buildings were constructed on each of the site parcels. It is believed, based on a review of historical city directories and the configuration of the current site building, that commercial occupants were present on the first floor of each building and residential apartments were located above. In general, commercial occupants of the site have generally consisted of restaurants and pharmacies at the 382 Grand Avenue parcel, a grocer and apparent painter at the 388 Grand Avenue parcel, a plumber and apparent furniture retailers at the 390 Grand Avenue parcel, and a grocer, pharmacies, and apparent arcade (Arnold Amusements) at the 394 Grand Avenue parcel. In addition, Rossetti A Cleaner was identified at the 394 Grand Avenue parcel in 1956 and the 388 Grand Avenue parcel in 1961. Although additional information regarding the operations associated with this occupant was not identified during the completion of the Phase I ESA, it is possible that the term “cleaner” indicates a potential former dry cleaner.

By the late 1980s, most of the site structures were razed with only the commercial/residential building on the 382 Grand Avenue parcel remaining. In place of the former buildings a parking lot was created. Since that time to present the site has largely remained unchanged. Currently the site building is occupied by Avellino’s Pizza and New Haven Pharmacy on the first floor and residential apartments on the second, third, and fourth floors.

A total of five AOCs were identified at the site during the completion of this Phase I ESA. Of these AOCs, none are considered RECs, as summarized in the table below.

**Summary of AOCs**  
382-394 Grand Avenue, New Haven, Connecticut

AOC/REC	Description	Substances of Concern	Potential Release Mechanisms
AOC 1	Potential Site-Wide Fill Material	PAHs, Metals, ETPH, PCBs	Impacted fill material deposited at surface of site, impacts from paving.
AOC 2	Potential Releases from Past and Present Building Components	Metals, PCBs, Asbestos	Releases surficial soil from peeling/chipping paint, leaching from caulks sealants or other materials.
AOC 3	Historical Heating Oil Systems	ETPH, PAHs, Metals	Releases from material handling, leaking tanks and piping.
AOC 4	Historical Site Activities	VOCs	Releases associated with potential historical dry cleaner.
AOC 5	Potential Releases from Off-Site Sources	ETPH, PAHs, VOCs, Metals	Migration of impact from off-site sources to the site.

ETPH = Extractable Total Petroleum Hydrocarbons

PAHs = Polynuclear Aromatic Hydrocarbons

PCBs = Polychlorinated Biphenyls

VOCs = Volatile Organic Compounds

*AOC 1 – Potential Site-Wide Fill Material*

The site is located in a historically urban area, and the potential for use of urban debris for fill material is possible. Historically, fill material containing ash, cinder, or slag has been deposited in urbanized areas and often contains elevated levels of metals, PAHs, or other compounds of concern.

According to municipal records, the current site building was formerly heated with a coal. In addition, other former site buildings may have also at one time been heated with coal. Coal ash generated from the burning of coal may have been placed at the site and contain elevated concentrations of PAHs and metals.

*AOC 2 – Potential Releases from Past and Present Building Components*

Buildings constructed between approximately 1950 and 1980 may contain a variety of caulks, sealants or other materials that may contain PCBs. Furthermore, it is also possible that vintage buildings constructed/renovated during or prior to that time may contain paint with elevated lead (or other metals) or asbestos. Over the years, these constituents may have been released to the soil within the building envelope during the process of normal deterioration of these materials or building maintenance/demolition. Furthermore, it was historically common practice during the demolition of buildings to fill in basement foundations with building debris.



Absent additional information regarding the composition of the current and former building materials on the exterior of the current site building and/or former site buildings, the potential impacts to soil are considered an AOC. Should additional information be provided that indicates that these materials are not (or have not) been used as part of the construction of past and present site buildings, then the need for soil testing can be re-evaluated.

#### AOC 3 – Historical Heating Oil Systems

According to the Fire Department records, a heating oil-fired system was used at the 390 and/or the 394 Grand Avenue parcels. This heating system was reportedly supplied with oil from a 275-gallon tank. Additional records regarding the location of this tank (above or belowground) and removal were not identified during the completion of the Phase I ESA. Records regarding heating systems at the other site parcels were also not identified. It is possible that the other former buildings and the current site building were historically heated with oil at one time. It is possible that releases associated with former tanks and piping had occurred at the site. In addition, if USTs were present at the site, it is possible that they could have been abandoned in place.

#### AOC 4 – Historical Site Activities

According to historical city directories, Rossetti A Cleaner was located at the 394 Grand Avenue parcel in 1956 and the 388 Grand Avenue parcel in 1961. The term “cleaner” may indicate that a potential historical dry cleaner operated at one or both of these parcels. Dry cleaners are known to use solvents (i.e. VOCs) as part of their operation that could be released. However, “cleaner” may also refer to a laundromat, a pick up and drop off dry cleaner (where dry cleaning activities are completed elsewhere), or a housekeeping service. Rossetti A Cleaner does not appear in the 1966 city directory, indicating that if dry cleaning operations did historically take place, they would have ceased prior to the May 1, 1967 effective date of the Connecticut Transfer Act.

#### AOC 5 – Potential Releases from Off-Site Sources

Several properties of concern were identified within ¼ mile of the site on the EDR report. One of these properties consisted of Fairhaven Community Center at 367 and 372 Grand Avenue, which is located east and adjacent to the site. Records for Fairhaven Community Center consisted of manifests for the generation of 1,200 pounds of hazardous waste solids (EPA waste code D008 for lead) in 1995 and 100 pounds of environmentally hazardous substances solid (EPA waste code D009 for mercury) in 1998. However, based on the apparent nature of the hazardous wastes generated at this property (solids) and the distance of other potential properties of the concern from the site, the risk to site subsurface conditions is believed to be minimal.

### **10.1 - Potential Receptors**

Sensitive receptors, including but not limited to high density residential neighborhoods, schools, daycare facilities, community recreational facilities, or elderly housing facilities were identified in the immediate vicinity of the site. Potable wells were not identified at the site during the site inspection. According to municipal records, the site is supplied with municipal water. Triton has not completed a formal well receptor survey, and as such, cannot offer a conclusion regarding the potential for drinking waters wells to be in use in the area.

### **10.2 - Preliminary Ecological Risk Assessment**

Based on the City of New Haven Inland Wetlands and Watercourses Map, wetlands are not mapped at the site. The nearest named surface water body is Mill River, located approximately 800 feet west of the site. Triton has not conducted a formal wetland survey at the site to verify mapped information and cannot offer any conclusions regarding the presence of wetlands or watercourses. According to the flood insurance rate map 09009C0442J dated July 8, 2013, the site is located within a Zone X flood zone (area of minimal flood hazard). According to the DEEP's Natural Diversity Database (December 2019), the site does not appear to be located in an area mapped with ecologically sensitive species.

### **10.3 - Other Environmental Considerations**

Although outside of the scope of this assessment, and not considered AOCs or recognized environmental conditions, additional items of potential environmental concern were identified including: ACM, LBP, PCBs, and mold. Recommendations regarding these non-scope considerations have been provided in the following section.

## 11.0 - FINDINGS, CONCLUSIONS AND RECOMMENDATIONS

Triton has performed a Phase I Environmental Site Assessment (ESA) in general conformance with the scope and limitations of *ASTM Practice E 1527-13* as well as the DEEP Site Characterization Guidance Document for the four contiguous properties collectively known as 382-392 Grand Avenue in New Haven, Connecticut. Any exceptions to, or deletions from, this practice are described in Section 1.3 of this report.

### 11.1 - Findings and Conclusions

The site has been used for commercial and residential uses dating back to early 1900s when apparent mixed use buildings were constructed on each parcel. Commercial occupants of these buildings typically consisted of restaurants, grocers, pharmacies, furniture retailer, and arcade. In addition, Rossetti A Cleaner was identified at the 394 Grand Avenue parcel in 1956 and the 388 Grand Avenue parcel in 1961. Although additional information regarding the operations associated with this occupant were not observed during the completion of the Phase I ESA, it is possible that the term “cleaner” indicates a potential former dry cleaner. However, if dry cleaning activities did occur at the site, they appear to have ceased by the May 1, 1967 effective date of the Connecticut Transfer Act.

By the late 1980s the majority of the site buildings were razed, with only the commercial/residential building on the 382 Grand Avenue parcel remaining. Since that time, the site appeared to have remained largely unchanged. Currently, the site is occupied by Avellino’s Pizza, New Haven Pharmacy, and residential tenants.

This assessment has revealed no evidence of RECs in connection with the property. However, the following five AOCs were identified in accordance with the *Site Characterization Guidance Document*:

- AOC 1 Potential Site-Wide Fill Material
- AOC 2 Potential Releases from Past and Present Building Components
- AOC 3 Historical Heating Oil Systems
- AOC 4 Historical Site Activities
- AOC 5 Potential Releases from Off-Site Sources

In addition to the AOCs identified above, Triton has identified additional environmental concerns at the site which, although outside of the scope of this assessment, may pose environmental risk. These include:

- The potential presence of building toxins within the building, including ACM, LBP, PCBs, mold, or other hazardous substances.

Based on the information reviewed during this assessment, the site is not believed to be subject to the Connecticut Transfer Act.

### **11.2 - Data Gaps**

As indicated in Section 1.3, a title report for the site was not provided and as such, the potential presence of environmental liens or use restrictions for the site could not be assessed.

The site owner indicated that environmental testing was completed at the site sometime between 2009 and 2012; however, Triton was not able to obtain the results of the testing for review.

A grease dumpster was present on the southwestern portion of the site. The surrounding area of the dumpster could not be directly observed due to snow cover.

### **11.3 - Recommendations**

Based on the information obtained during this assessment, Triton has developed the following recommendations to address the identified RECs/AOCs, data gaps, and other environmental concerns:

1. Triton recommends that a Phase II ESA be performed for all identified RECs/AOCs and that any other findings, conclusions, and/or data gaps be considered.
2. Given the age of the building, hazardous building materials including ACM, LBP, and PCBs and other constituents may be present. Triton recommends that a hazardous materials survey be completed should demolition and/or renovation activities be planned for the site. Even if such activities are not planned, such a survey may be warranted in order to identify potential health risks and to develop an appropriate management plan for any identified materials.

3. According to the site owner, a sewer backup occurred within the basement of the site building. Sections of water damaged drywall were removed as a result. It is possible that as a result of the flooding, and the inherent dampness typical of sub-grade basements, that mold may be present. Triton recommends that a mold survey be performed.

## 12.0 - REFERENCES

1. Environmental Data Resources, Inc. report (5942219.2s), dated January 21, 2020.
2. Surficial Materials Glacial and Postglacial Deposits Map of New Haven, Connecticut, Connecticut DEEP, dated August 2009.
3. Bedrock Geology Map of Connecticut, compiled by John Rodgers in cooperation with the U.S. Geological Survey, dated 1985.
4. Water Quality Classifications Map of New Haven, Connecticut, Connecticut DEEP, dated October 2018.
5. Historical Aerial Photographs dated 1934, 1949, 1951, 1959, 1963, 1966, 1972, 1980, 1985, 1991, 1995, 2005, 2008, 2012, and 2016, provided by EDR.
6. Historic Sanborn Fire Insurance Company Maps dated 1886, 1901, 1924, 1950, and 1973, provided by EDR
7. Historic Topographic Maps dated 1943, 1954, 1967, 1984, and 2018, obtained from the U.S. Geological Survey.
8. Historic City Directories dated 1936 to 2019.
9. USGS 7.5 minute topographic map of the New Haven, CT quadrangle dated 2012 provided by EDR
10. State of Connecticut Department of Energy and Environmental Protection, file review.

### 13.0 - LIMITATIONS

1. This report was completed by Triton for the sole use of New Haven Bank concerning an assessment of on-site environmental conditions. Use of this report by any other person for any other purpose is not authorized without the prior consent of Triton.
2. The work was undertaken to assess environmental conditions specifically at the subject site in general accordance with ASTM E 1527-13 and generally accepted industry practices. The exceptions to ASTM E 1527-13 have been noted in Section 1.3 of this report. No other warranty, expressed or implied, is made. Absolute assurance that any and all possible contamination at the site was identified cannot be provided. Unless otherwise noted, no specific attempt was made to check the compliance of present or past owners or operators of the site with federal, state, or local laws and regulations, environmental or otherwise. This Phase I does not constitute a Regulatory Compliance Review.
3. This Phase I ESA did not involve inspections, surveys or sampling of any kind including soil, groundwater, building toxins (e.g. asbestos containing materials, lead based paint, PCBs) radon or mold. Triton has not conducted a formal wetland delineation at the site.
4. As building materials surveys have not been completed, Triton cannot determine the potential for risk of materials such as exterior paint or caulk to have released compounds of concern (i.e. PCBs, asbestos, lead) into soils surrounding the structure(s). Therefore, unless otherwise indicated in the report, this potential risk has not been identified as an AOC. Should absolute assurance be needed regarding the lack of such substances in the soils around the building, testing can be conducted.
5. Where visual observations have been included in this report, they represent conditions at the time of the site inspection and may not be indicative of past or future site conditions. As several apartment units were occupied and access was not permitted, not all site areas could be viewed during the site inspection.
6. In completing this Phase I ESA, Triton relied upon information provided by state and local officials and information and representations made by other parties referenced in the report, and on information contained in the files of state and/or local agencies made available to Triton. To the extent such files are missing, incomplete, or not provided to Triton, Triton is not responsible. Although there may be some degree of overlap in the information provided by these various agencies, Triton did not attempt to independently verify the accuracy or completeness of all information reviewed or received during the course of this assessment. Triton is also not responsible for information that may be contained in files or other material not available or accessible at the time the file review was conducted.
7. If previous environmental reports were provided to Triton by either its client or the owner of the property, it is assumed that Triton can utilize the information contained in those reports in formulating its conclusions as part of this assessment.

8. Fill materials are commonly utilized to elevate grades at sites during construction or re-grading activities. Although not necessarily an environmental concern, fill materials can include debris that may potentially contain elevated concentrations of regulated compounds. This is particularly the case in urban settings. It is often difficult to determine the potential presence and quality of fill material during the completion of a Phase I ESA inspection. Unless specifically identified in this report, Triton has not considered historical filling to be an area of concern at this site. However, the user should be aware of the potential for historical filling (and associated impacts) to be present.
9. The DEEP has developed regulations regarding the re-use of soils in Connecticut. Unless soil is "natural soil," free of all impact, such soil is not considered clean fill and must be pre-approved to re-use at other sites (even if in compliance with DEEP cleanup standards). If excavation activities are anticipated that could generate excess soils, these re-use requirements should be taken into account.
10. Environmental impacts can often travel significant distances. Releases may have occurred at off-site properties that are not identified in the standard environmental records or additional records reviewed as part of the scope of this assessment. Although off-site impacts may not have been identified as an AOC/REC at this site, there is always some risk that these impacts may be present (particularly in heavily developed areas). If absolute assurance is needed regarding the absence of impact from off-site sources, testing would be required.
11. During the course of this assessment, standard record sources were reviewed relative to hazardous waste manifests associated with the site, including databases maintained by the State of Connecticut and other states. However, these databases are often not kept up-to-date by the agencies. Furthermore, certain states may not have this information available in a searchable electronic database. Triton cannot be held responsible for any missing or incomplete information associated with these records.
12. Unless specifically requested by the client, the scope of work does not include completion of a vapor intrusion assessment in accordance with ASTM E 2600-08.



## 14.0 - QUALIFICATIONS STATEMENT

Triton Environmental, Inc. (Triton) is a full-service environmental consulting company with extensive experience in the completion of Phase I ESAs. The staff of environmental scientists, hydrogeologists, and Licensed Environmental Professionals (LEPs) within Triton's Assessment and Remediation Section have completed hundreds of Phase I ESAs. Triton staff responsible for preparation of Phase I ESAs (including this document) have extensive experience in completing Phase I ESAs in accordance with the current American Society of Testing and Materials standard practice document (ASTM E 1527-13). The resumes of the individual environmental professionals responsible for the completion of this Phase I ESA are included in Appendix G.

This Phase I ESA was completed under the direction of an "Environmental Professional" as defined in ASTM E 1527-13 and 40 CFR 312.10. The Environmental Professional was involved in the planning of the site reconnaissance and the interviews, as well as the review and preparation of the report.

**15.0 - SIGNATURES OF REPORT AUTHORS AND DECLARATION OF ENVIRONMENTAL PROFESSIONAL**

This report has been prepared by Triton Environmental, Inc. The names listed below are the principal authors of this report. Requests for information regarding the content of this report should be directed to those individuals.

***Prepared By:***

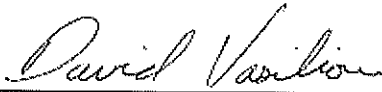


---

Mark E. Paulsson  
Project Manager

*I declare that to the best of my professional knowledge and belief, I meet the definition of an Environmental Professional as defined in ASTM E 1527-13 and 40 CFR 312.10. I have the specific qualification based on education, training, and experience to assess a property of the nature, history, and setting of the subject property. I have developed and performed all appropriate inquiries in conformance with the standard and practices set forth in 40 CFR Part 312.*

***Reviewed By:***



---

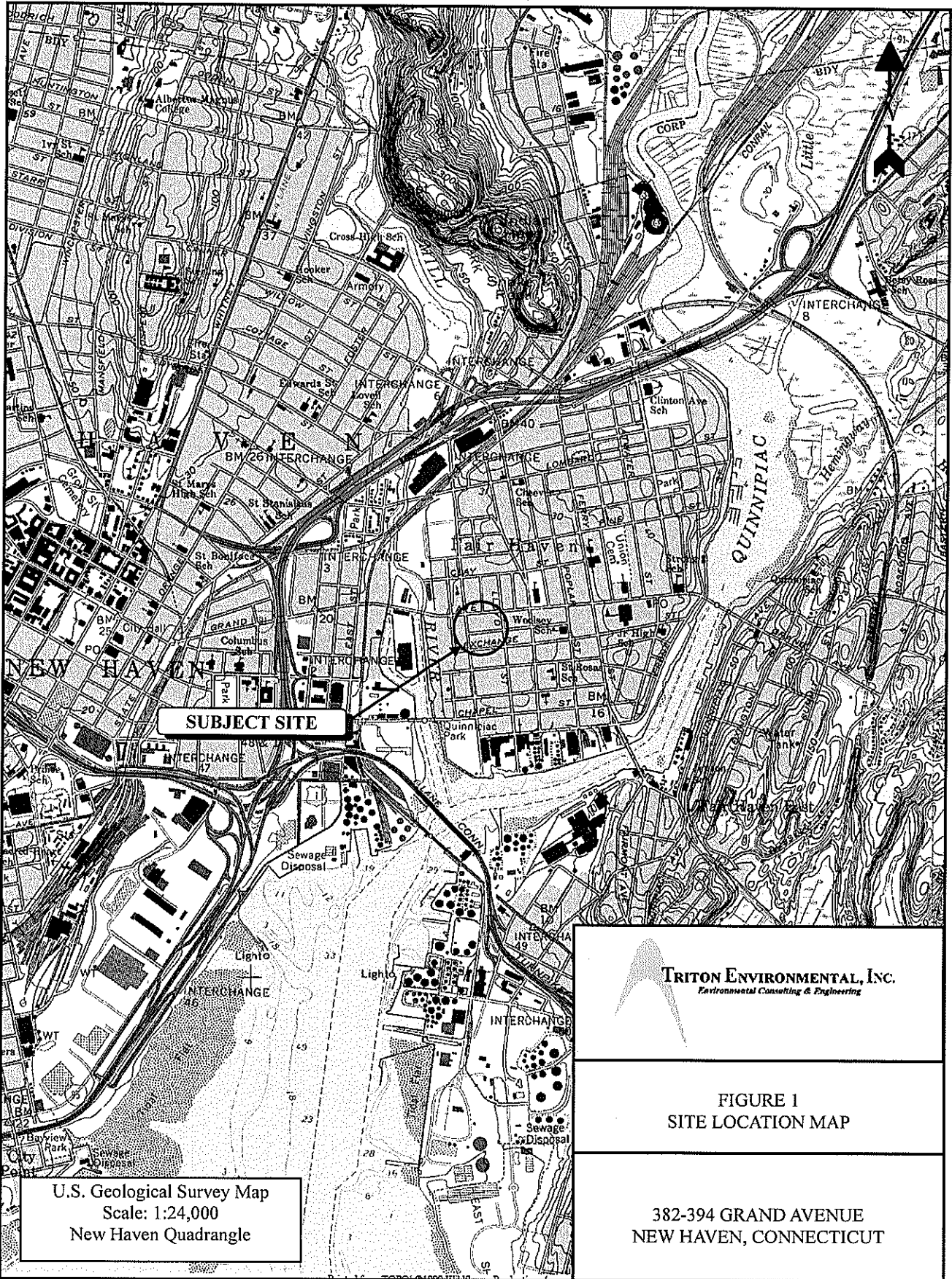
David S. Vasiliou, LEP  
Senior Project Manager



---

J. Carver Glezen, LEP  
Senior Vice President

## FIGURES



**SUBJECT SITE**

U.S. Geological Survey Map  
 Scale: 1:24,000  
 New Haven Quadrangle



**FIGURE 1**  
**SITE LOCATION MAP**

**382-394 GRAND AVENUE**  
**NEW HAVEN, CONNECTICUT**