

# Task 210

# Subsurface Site Investigation Report ConnDOT Project Number 173-468

August 2019

# Stratford Signalization Project

# **Prepared For:**

State of Connecticut Department of Transportation Division of Environmental Compliance Newington, Connecticut

# Prepared By:

TRC 21 Griffin Road North Windsor, Connecticut 06095





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# **1.0 Introduction**

# 1.1 Overview

Pursuant to TRC's Connecticut Department of Transportation (ConnDOT) Contract for On-Call Environmental Services, TRC performed a Task 210 Subsurface Site Investigation at Intersection 138-250 (Route 110 at the Dock Shopping Center and the Stratford Crossing Shopping Center) in Stratford, Connecticut (Figure 1 and ENV-02). This investigation was conducted as part of the preliminary activities associated with the proposed signalization project improvements under ConnDOT project number 173-468. Specifically, this investigation was conducted within or in the immediate vicinity of proposed work areas, including proposed mast arms, pedestal foundations, and several handholds as identified on project plans provided to TRC for review to determine soil quality to anticipated excavation depths.

Note that a Task 210 Subsurface Investigation was previously conducted by TRC in 2017 within areas of proposed signalization improvements at the intersections of Ferry Boulevard, Barnum Avenue Cutoff, and several private driveways. The results of that investigation were documented in the report entitled *Task 210 Subsurface Site Investigation Report – Stratford Signalization Project* that was prepared by TRC in February 2018.

# 1.2 Objectives

The primary objectives of this Task 210 site investigation were to:

- Determine if the impermeable cap installed at the Raymark Superfund Site (the presentday Stratford Crossing Shopping Center) is present within the proposed construction depths;
- Determine soil quality in the project area;
- Determine if "Raymark Waste", as defined by the USEPA (see Section 3.0) exists within the project area limits, given its proximity to the former Raymark Industries, Inc. (Raymark) Superfund Site;
- Utilize the gathered data to determine how best to manage soil during excavation activities.

# 1.3 Background

Based on a review of project plans provided to TRC by ConnDOT, the Stratford signalization improvements to be conducted as part of this project will include modifications to the existing Connecticut State Route 110 northbound and southbound vehicular and pedestrian traffic. Specifically, the project will involve the reconfiguration of traffic control signals and sidewalk ramps at the driveways to the Stratford Crossing Shopping Center and the Dock Shopping Center.

Proposed improvements include traffic control devices mounted on mast arms and pedestal foundations to a maximum depth of 10 feet below existing grade, and along the proposed sidewalk to a maximum depth of two feet below existing grade.



# 1.3.1 Raymark Superfund Site

As indicated previously, the entire project area is located in close proximity to and partially on the Raymark Superfund Site; specifically, Raymark was previously located at the location of the present-day Stratford Crossing Shopping Center. According to the most recent Five-Year Review Report for the Raymark site prepared by the USEPA in September 2015, the Raymark facility operated from 1919 until 1989 and manufactured friction materials containing asbestos and nonasbestos containing components, metals, phenol-formaldehyde resins and various adhesives. Soils at the facility became contaminated with metals, asbestos, dioxins and polychlorinated biphenyls (PCBs). Groundwater is documented to have become contaminated with volatile organic compounds (VOCs), semi-volatile organic compounds (SVOCs) and metals. During the operational history of the Raymark facility, it was common practice to dispose of manufacturing waste as fill material both on the Raymark facility property and at locations throughout the Town of Stratford. Extensive environmental investigations and remedial activities were conducted both on and off the Raymark site from the early 1990s through the present day. USEPA sampling of process waste found on the former Raymark property identified lead, asbestos, PCBs and copper as the four most common constituents of "Raymark Waste". Remediation of the former Raymark facility itself (designated as Operable Unit (OU) 1 by the USEPA) was completed in 1997 and the site was redeveloped into the present-day Stratford Crossing Shopping Center in the early 2000s. Remediation of OU1 included the installation of an impermeable cap across the majority of the property. A total of nine OUs have since been identified by USEPA in connection with the Raymark Facility. OU2 is related to contaminated groundwater within and downgradient of the former Raymark Facility. OU3 through OU9 are all related to areas where Raymark Waste, as defined by USEPA, is known to have been deposited throughout the Town of Stratford.

According to the OU6 Remedial Investigation (RI) prepared by Tetra Tech NUS, areas of Raymark Waste have been identified in close proximity to the project corridor, specifically on several properties along East Main Street (Connecticut State Route 110), located within the Stratford signalization project area.

# 1.4 Geologic/Physical Setting

As indicated by the Surficial Materials Map of Connecticut (Stone et al, 1992), the site is located in an area underlain by sand. Surficial materials are composed mainly of very coarse to fine sand, commonly in well-sorted layers. Coarser layers may contain up to 25 percent gravel particles, generally granules and pebbles; finer layers may contain some very fine sand, silt and clay (interpreted as delta-foreset beds, very distal fluvial deposits, or windblown sediment).

Based on the descriptions of the soil cores collected during the Task 210 field investigation, the site is generally underlain by sand with varying amounts of silt and gravel. Test pits completed on the Raymark Superfund site indicate that soils above the Raymark liner are comprised of fine processed material mixed with Portland cement.

As indicated by the Bedrock Geological Map of Connecticut (Rogers, 1985), the site is located within an area of Oronoque Schist. The sand deposits at the site are underlain by gray to silver, medium- to fine grained schist and granofels.

The topography in the immediate project area can be characterized as generally flat. Groundwater generally flows from high topographic points to low topographic points, but can also



be heavily influenced by aquifer type, depth to bedrock, nearby watercourses, groundwater use (e.g., withdrawal wells) and subsurface structures. Based on the local topography and features, groundwater is anticipated to flow to the east towards the Housatonic River. Groundwater contour maps presented in the various EPA reports and studies for the Raymark site confirm this generalized direction of groundwater flow.

According to the Connecticut Department of Energy and Environmental Protection (CTDEEP) groundwater classification maps reviewed by TRC, groundwater beneath the site is classified as "GB". Class GB groundwater designated uses are industrial process water, cooling waters and baseflow for hydraulically connected surface water bodies. It is presumed not suitable for human consumption without treatment.



# 2.0 Technical Approach

This section of the report summarizes the soil sampling methods employed during the Task 210 field investigation. Observations made in the field are also summarized in this section.

As indicated above, the focus of the Task 210 Subsurface Site Investigation was to determine if the impermeable cap installed at the Stratford Crossing Shopping Center is present within the proposed construction depths and to determine soil quality in the project area. Specifically, the focus on soil quality was to identify if Raymark Waste (see definition below) is present in the project area. As such, four test pit locations were proposed at the locations of proposed improvements on the western side of Intersection 138-250, specifically to determine if the impermeable liner was present. Note that only three of the original four proposed test pit locations could be completed due to utility conflicts at one location. Each of these test pits was advanced to the depth of the warning layer that is present above the actual liner, approximately two and a half feet below grade. Additionally, two soil borings were advanced to a depth of ten feet below grade on the eastern side of Intersection 138-250.

A total of 15 soil samples were collected (six from the test pits and nine from the soil borings) and submitted to the laboratory for analysis. Samples were generally collected continuously from the test pits/borings at two-foot intervals. Note that at soil boring SIG-SB-1, the 0-2- and 2-4-foot sample intervals, and the 4-6- and 6-8-foot sample intervals were combined as the soil cores contained primarily fractured rock mixed with a small amount of soil.

As the Stratford signalization improvements project is located in close proximity to the former Raymark Superfund Site, soil sample results were also evaluated against "Raymark Waste" criteria. Note that the Raymark Waste definition was developed by USEPA so that Raymark Waste could be uniquely distinguished from other contaminants that may be present in a given area. As previously indicated, lead, asbestos, PCBs and copper were the most common constituents found in Raymark Waste at the former Raymark Facility. Based on these constituents, and the concentration and frequency of their co-location in a single sample, the following definition of the Raymark Waste was formally developed by USEPA in a statement released in May 2010 (see Appendix C): "Raymark Waste" is defined as soil from a single soil sample at a same depth interval that contains lead above 400 milligrams per kilogram (mg/kg), asbestos (chrysotile only) greater than 1 percent and either PCBs (Aroclor 1268 only) above 1 mg/kg or copper above 288 mg/kg.

Historically, data reproducibility issues (particularly with respect to lead and asbestos concentrations) have been documented during investigations of Raymark Waste. As documented in the URS report entitled *Raymark Waste Delineation Final Report – Airport Property Portion of Additional Properties Operable Unit* 6 dated March 2014, these issues have been attributed to the heterogeneity of the Raymark Waste Material. Based on this information, URS developed a modified process for determining if the material sampled was or was not Raymark Waste. Specifically, analytical protocols were modified to allow for further evaluation of lead results between 300 and 400 mg/kg and the criteria for chrysotile asbestos relative to its percentage in Raymark Waste was modified to 0.5%. This modified approach involved the use of primary and replicate sample data for lead. Specifically, if the primary results of the lead analysis was greater than 300 mg/kg, the replicate sample would also be analyzed. If the results of the replicate analysis was greater than 400 mg/kg, and the sample also contained the requisite concentrations of chrysotile asbestos (modified to 0.5%), Aroclor 1268 (1 mg/kg) or copper (288 mg/kg), the



material was determined to be Raymark Waste. Further, if the results of the primary and replicate lead analyses were below 400 mg/kg but the relative percent difference (RPD) between the results was greater than 50%, and the sample contained the requisite concentrations of asbestos, Aroclor 1268 or copper, the material was also determined to be Raymark Waste.

Each of the soil samples collected was sent to the TRC Industrial Hygiene Laboratory in Windsor, Connecticut for Asbestos analysis by EPA Method 600/R-93/116. Sample aliquots were also sent to Phoenix Environmental Laboratories, Inc. (Phoenix) in Manchester, Connecticut and held for potential analysis of volatile organic compounds, (VOCs) by EPA Method 8260, semi-volatile organic compounds (SVOCs) by EPA Method 8270, extractable total petroleum hydrocarbons (ETPH), polychlorinated biphenyls (PCBs) by EPA Method 8082, RCRA 8 metals and copper by EPA Method 6000/7000 pending the results of the asbestos analysis.

# 2.1 Preliminary Activities

Preliminary activities included the preparation of a Health and Safety Plan (HASP) to address the field work to be completed as part of this Task 210. Prior to beginning the investigation, TRC marked the proposed test pit/boring locations at the site with white paint on the ground surface. "Call Before You Dig" (CBYD) was contacted to mark the locations of buried utilities in the proposed work zones. In addition, a private utility mark-out service (Underground Surveying of Brookfield, CT) was contracted to conduct a more detailed mark-out given the presence of several utilities within the work areas.

# 2.2 Test Pitting / Soil Boring Program

# Test Pitting Methodology

A total of three test pits were excavated by Cisco Environmental, LLC (Cisco) of New Haven, Connecticut on April 3, 2019 on the western side of Intersection 138-250. The test pits were completed by Cisco, under direct supervision of TRC, with a mini excavator outfitted with a grading bucket to avoid potential damage to the Raymark liner. Representatives from ConnDOT and the Connecticut Department of Energy and Environmental Protection (CTDEEP) were present as well. Test pits typically measured 2.5 feet wide by 2.5 feet long and were advanced to the depth of the warning layer for the Raymark liner (generally 2.5 to 3.0 feet below grade (ftbg)).

Soil borings were advanced on April 4, 2019 by Cisco Geotechnical, LLC (Cisco) of New Haven, Connecticut, under the direct supervision of TRC personnel. These borings were advanced utilizing a track-mounted GeoProbe<sup>™</sup>. At both sample locations, soil cores were collected in an acetate Macro-Core<sup>®</sup> liner continuously from the ground surface to a maximum depth of 10 ftbg (which represents the proposed maximum depth of construction).

Soils within the test pits and each four-foot soil core was logged with respect to soil characteristics (i.e., grain size, moisture content and any other physical characteristics) and indications of potential impacts (e.g., stains and odors). In addition, soils from the test pits and cores were field-screened using a photo ionization detector (PID) prior to the collection of soil samples for analysis. Test pit / soil boring logs are presented in Appendix A. The test pit / soil boring locations are shown on ENV-02.



Soil samples slated for potential analysis of VOCs were collected in accordance with EPA Method 5035. This method outlines the collection of soil samples, without homogenization and with minimal disturbance, and transfer into extraction solvents. The remaining soil was then homogenized utilizing dedicated/decontaminated stainless-steel bowls and spoons, placed in the appropriate laboratory-supplied sample containers and then placed on ice, in a cooler, for delivery to the laboratories.

The probe tip and Macro-Core<sup>®</sup> sampler were decontaminated between uses to minimize the potential for cross-contamination. The decontamination was completed by washing with an Alconox and tap water mixture, followed by a tap water rinse and a final deionized water rinse.

#### Field Observations

At each of the test pit locations, the top of the Raymark liner was encountered at approximately 2.5 to 3 feet below grade. Soils above the liner were comprised of fine-grained sand and silt with varying amounts of fine-grained processed gravel. A layer of dense compacted sand was encountered directly above the orange warning layer that is present above the Raymark liner at each test pit location. According to CTDEEP personnel present during the test pitting program, this sand layer was mixed with Portland cement to achieve compaction specifications during construction of the cap at the Raymark site.

Soils observed in the soil cores collected on the eastern side of Intersection 138-250 were generally comprised of sand with varying amounts of gravel and silt.

Each soil core was screened with a PID for volatile organic vapors. No elevated PID readings were observed in soils, and TRC did not observe any odors or staining.



# **3.0 Investigation Results**

The following sections provide a summary of the analytical results related to the soil sampling conducted at the site. A total of 15 soil samples were collected and analyzed for asbestos. The asbestos results are summarized in Table 1. Copies of the laboratory reports are provided in Appendix B.

# 3.1 Soil Sample Results

A summary of the asbestos soil sample analytical results is presented in Table 1. A copy of the laboratory analytical reports for the soil samples is included as Appendix B.

# Asbestos

As indicated in the results summary in Table 1, asbestos was not identified in the 15 soil samples collected as part of this investigation. As such, in accordance with the methodology described in Section 2, the soil samples were not submitted for further chemical analysis.



# 4.0 Conclusions and Recommendations

This section briefly summarizes the findings of the Task 210 exploratory site investigation activities conducted at the site in April of 2019. Also included are recommendations based on these findings/conclusions.

# 4.1 Soil

- 1. At each of the test pit locations, the top of the Raymark liner was encountered at approximately 2.5 to 3 feet below grade. Soils above the liner were comprised of finegrained sand and silt with varying amounts of fine-grained processed gravel. A layer of dense compacted sand was encountered directly above the orange warning layer that is present above the Raymark liner at each test pit location. According to CTDEEP personnel present during the test pitting program, this sand layer was mixed with Portland cement to achieve compaction specifications during construction of the cap at the Raymark site.
- 2. Soils observed in the soil cores collected on the eastern side of Intersection 138-250 were generally comprised of sand with varying amounts of gravel and silt.
- 3. Asbestos was not present in any of the soil samples that were collected as part of this investigation. As such, the soil samples were not subjected to further chemical analysis.

<u>Recommendation:</u> Based on the results of this investigation, TRC recommends that appropriate Plans, Specifications, and Estimate (Task 310) be prepared. It is recommended that a Notice To Contractor be prepared to notify all redevelopment contractors of the presence of Raymark liner on the western side of the intersection. Additionally, while asbestos was not identified in samples collected as part of this investigation, its presence at nearby locations (including beneath the liner at the Raymark Superfund site) warrants the preparation of appropriate plans and specifications.



# 5.0 References

Environmental Protection Agency, 2015. Fourth Five-Year Review Report For Raymark Industries, Inc. Superfund Site, Fairfield County, Connecticut.

Rogers, J. 1985. Bedrock Geological Map of Connecticut. State Geological and Natural History of Connecticut. Scale 1:125,000.

Stone, J.R. 1992. Surficial Materials Map of Connecticut. U.S. Department of the Interior, U.S. Geological Survey. Scale1:125,000.

Tetra Tech NUS, Inc. 2005. Final Remedial Investigation, Raymark – OU6 – Additional Properties. Stratford, Connecticut.

URS Corporation, March 2014. Raymark Waste Delineation Final Report – Airport Property Portion of Additional Properties Operable Unit 6.

Figures





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SIG-SB-1 🔶
SIG-TP-1 🖶
(NT33-SB45⊕



Tables

# Table 1Asbestos Soil Sample Analytical ResultsTask 210 Subsurface InvestigationStratford Signalization Project, Stratford, ConnecticutTRC Project No. 237612.5905.210ConnDOT Project No. 173-468

Sample Identification	Sample Date	Sample Interval (ftbg)	Notes	Asbestos EPA 600/R- 93/166	Asbestos Type
SIG-TP-1(0-2)	4/3/2019	0-2		ND	None
SIG-TP-1(2-2.5)	4/3/2019	2-2.5		ND	None
SIG-TP-2(0-2)	4/3/2019	0-2		ND	None
SIG-TP-2(2-2.5)	4/3/2019	2-2.5		ND	None
SIG-TP-3(0-2)	4/3/2019	0-2		ND	None
SIG-TP-3(2-3)	4/3/2019	2-3		ND	None
SIG-SB-1(0-4)	4/4/2019	0-4		ND	None
SIG-SB-1(4-8)	4/4/2019	4-8		ND	None
SIG-SB-1(8-9)	4/4/2019	8-9		ND	None
SIG-SB-1(9-10.6)	4/4/2019	9-10.6		ND	None
SIG-SB-2(0-2)	4/4/2019	0-2		ND	None
SIG-SB-2(2-4)	4/4/2019	2-4		ND	None
SIG-SB-2(4-6)	4/4/2019	4-6		ND	None
SIG-SB-2(6-8)	4/4/2019	6-8		ND	None
SIG-SB-2(8-10)	4/4/2019	8-10		ND	None

NOTES: ftbg - feet below grade ND - Not Detected



Appendix A Test Pit / Soil Boring Logs



BORING/WELL COMPLETION WITH NOTES - TRC\_WINDSOR\_STD.GDT - 9/20/19 ZMAT/GINT/CHRIS/STRATFORD SIGNALIZATION PROJECT.GPJ

				PP				BORING						
	Proje	ect Na	me: S	Stratfo	rd Signa	lization Project	Boring Depth	12	Hole Diamete	r: _				
	Project	Loca	tion:	Stratfo	rd, Conr	necticut	Date Started	4/4/19	Date Completed	: <b>4</b>	/4/1	9		
	Projec	Cli	ient: <b>(</b>	Connee	ticut De	partment of Transportation	North	Not Surveyed	yed East: Not Surv			/ey	ed	
	L	ogged	By:	C. War	ner		Vertical Datum		Ground Elevation	n: 🖪	lot (	Surv	/ey	əd
	Ch	lecked	Ву: _											
D	rilling C	Contra	ctor: (	Disco,		INFORMATION	MEASUREMENT		At End of Drilling		<b>▼</b> A	fter l	Drilli	ng
	Drillin	Drille	r(s): _				DATE	Not Observed		_				
E	Equipme	ent/Mo	odel: _				REFERENCE	Not Observed						
		Sam	pler: 4	8" Ma	crocore		STABILIZATION							
Depth (FT.)	SAMPLE NUMBER	SAMPLE TYPE	PENETRATION (FT.)	RECOVERY (FT.)	ЛОПОНТ	M	ATERIAL DESCRIPTION			◆ VOC SCREENIN RESULTS (ppm)				
	-				$\overline{Z_{I,I}}^{-1} = \overline{Z_{I,I}}$	0 '- 0.5 ' <b>TOPSOIL</b> .					2	4	6	8
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**Appendix B Laboratory Analytical Reports** 

Industrial Hygiene Laboratory 21 Griffin Road North Windsor, CT 06095 (860) 298-6308



Page 1 of 1 53569.CT-DOT.doc

#### BULK ASBESTOS ANALYSIS REPORT

#### CLIENT: CT Department of Transportation

Lab Log #:	0053569
Project #:	237612.5905.0210
Date Received:	04/04/2019
Date Analyzed:	04/05/2019

Site: Proposed Signal Project, Stratford, CT

#### POLARIZED LIGHT MICROSCOPY by EPA 600/R-93/116

Sample No.	Color	Homogenous	Multi- Layered	Layer No.	Other Matrix Materials	Asbestos	Asbestos Type
SIG-TP-1 (0-2')	Brown (soil sample)					ND	None
SIG-TP-1 24"- 33")	Brown (soil sample)					ND	None
SIG-TP-2 (0-2')	Brown (soil sample)					ND	None
SIG-TP-2 (24"- 33")	Brown (soil sample)					ND	None
SIG-TP-3 (0-2')	Brown (soil sample)					ND	None
SIG-TP-3 (24"- 35")	Brown (soil sample)					ND	None

Reporting limit-

ND - asbestos was not detected Present- asbestos was detected

SNA- Sample Not Analyzed- See Chain of Custody for details

Note: Polarized-light microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. In those cases, EPA recommends, and certain states (e.g. NY) require, that negative results be confirmed by quantitative transmission electron microscopy.

The Laboratory at TRC follows the EPA's Interim Method for the Determination of Asbestos in Bulk Insulation 1982 (EPA 600/M4-82-020) Bulk Analysis Code 18/A01 and the EPA recommended Method for the Determination of Asbestos in Bulk Building Materials July 1993, R.L. Perkins and B.W. Harvey, (EPA/600/R-93/116) Bulk Analysis Code 18/A03, which utilize polarized light microscopy (PLM). Our analysts have completed an accredited course in asbestos identification. TRC's Laboratory is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP), for Bulk Asbestos Fiber Analysis, NVLAP Code 18/A01, effective through June 30, 2019. TRC is accredited by the AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC in the Industrial Hygiene Program (IHLAP) for PLM effective through October 1, 2019. Asbestos content is determined by visual estimate unless otherwise indicated. Quality Control is performed in-house on at least 10% of samples and QC data related to the samples is available upon written request from client.

This report shall not be reproduced, except in full, without the written approval of TRC. This report must not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report relates only to the items tested.

Analyzed by:

**Reviewed by:** Kathleen Williamson, Laboratory Manager

Date Issued 04/05/2019

Cathryn Lemire, Approved Signatory

TRC LABORATORY ASBESTOS ANALYTICAL ACCREDITATIONS

NVLAP Lab Code 101424-0 **RI #AAL-007** TX #300354 CO# AL-15020

AIHA-LAP,LLC #100122 CT #PH-0426 VT #AL014538 LA#05011 VA #3333 000283 PHIL# 461

PA#68-03387

ME LA-0075, LB-0071 MA #AA000052 NY #10980 WV# LT000411 AZ #A20944

HI #L-09-004 NJ #CT004 CA #2907

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Industrial Hygiene Laboratory 21 Griffin Road North Windsor, CT 06095 (860) 298-6308



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#### **BULK ASBESTOS ANALYSIS REPORT**

#### CLIENT: CT Department of Transportation

Lab Log #:	0053572
Project #:	237612.5905.0210
Date Received:	04/05/2019
Date Analyzed:	04/05/2019

Site: Proposed Signal Project, Stratford, CT

# POLARIZED LIGHT MICROSCOPY by EPA 600/R-93/116

			Multi-	Layer No.	Other Matrix	Asbestos	Asbestos
Sample No.	Color	Homogenous	Layered		Materials		Туре
SIG-SB-1 (0-4')	Brown (soil sample)					ND	None
SIG-SB-1 (4'-8')	Brown (soil sample)					ND	None
SIG-SB-1 (8'-9')	Brown (soil sample)					ND	None
SIG-SB-1 (9'- 10.6')	Brown (soil sample)					ND	None
SIG-SB-2 (0-2')	Brown (soil sample)					ND	None
SIG-SB-2 (2'-4')	Brown (soil sample)					ND	None
SIG-SB-2 (4'-6')	Brown (soil sample)					ND	None
SIG-SB-2 (6'-8')	Brown (soil sample)					ND	None
SIG-SB-2 (8'- 10')	Brown (soil sample)					ND	None

TRC LABORATORY ASBESTOS ANALYTICAL ACCREDITATIONS

	The Endorm on Hobeston infiniti freek reekelptititions											
NVLAP Lab Cod	le 101424-0	AIHA-LAP,LLC #100122	СТ #РН-0426	ME LA-0075, LB-0071	MA #AA000052	NY #10980	WV# LT000411					
RI #AAL-007	TX #300354	VT #AL014538 LA#05011	VA #3333 000283	AZ #A20944	HI #L-09-004	NJ #CT004	CA #2907					
CO# AL-15020		PHIL# 461	PA#68-03387									



#### POLARIZED LIGHT MICROSCOPY by EPA 600/R-93/116

			Multi-	Layer No.	Other Matrix	Asbestos	Asbestos
Sample No.	Color	Homogenous	Layered		Materials	%	Туре

Reporting limit-ND - asbestos was not detected Present- asbestos was detected

SNA- Sample Not Analyzed- See Chain of Custody for details

Note: Polarized-light microscopy is not consistently reliable in detecting asbestos in floor coverings and similar non-friable organically bound materials. In those cases, EPA recommends, and certain states (e.g. NY) require, that negative results be confirmed by quantitative transmission electron microscopy.

The Laboratory at TRC follows the EPA's Interim Method for the Determination of Asbestos in Bulk Insulation 1982 (EPA 600/M4-82-020) Bulk Analysis Code 18/A01 and the EPA recommended Method for the Determination of Asbestos in Bulk Building Materials July 1993, R.L. Perkins and B.W. Harvey, (EPA/600/R-93/116) Bulk Analysis Code 18/A03, which utilize polarized light microscopy (PLM). Our analysts have completed an accredited course in asbestos identification. TRC's Laboratory is accredited under the National Voluntary Laboratory Accreditation Program (NVLAP), for Bulk Asbestos Fiber Analysis, NVLAP Code 18/A01, effective through June 30, 2019. TRC is accredited by the AIHA Laboratory Accreditation Programs (AIHA-LAP), LLC in the Industrial Hygiene Program (IHLAP) for PLM effective through October 1, 2019. Asbestos content is determined by visual estimate unless otherwise indicated. Quality Control is performed in-house on at least 10% of samples and QC data related to the samples is available upon written request from client.

This report shall not be reproduced, except in full, without the written approval of TRC. This report must not be used by the client to claim product endorsement by NVLAP or any agency of the U.S. Government. This report relates only to the items tested.

Analyzed by: **Reviewed by:** 

Kathleen Williamson, Laboratory Manager

Cathryn Lemire, Approved Signatory

**Date Issued** 04/05/2019

TRC LABORATORY ASBESTOS ANALYTICAL ACCREDITATIONS NVLAP Lab Code 101424-0 AIHA-LAP,LLC #100122 CT #PH-0426 ME LA-0075, LB-0071 MA #AA000052 NY #10980 WV# LT000411 RI #AAL-007 VT #AL014538 LA#05011 VA #3333 000283 TX #300354 AZ #A20944 HI #L-09-004 NJ #CT004 CA #2907 PHIL# 461 CO# AL-15020 PA#68-03387

Edition: October 2009 Supersede Previous Edition	LAB ID #. 53572 TURNAROUND TIME PLM: 8hr 48hr 3day TEM: 24hr 48hr 3day 5day MATERIAL				5.0	3							2		Date: Received by: (Signature)		Time: (Printed)	Page of				
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	21 GRIFFIN I WINDSOR, C	TELEPHONE FAX (860) 298	PROJECT NI	CTOR #	SIGNATIDE	CleDi		FIELD SAMPLE NUMBER	516-58-1 (0-4)	SIG-59-1 (4-8')	510-59-1 (8,21)	S16-58-1 (9-10-6)	516-513-2 (5-2)	516-58-2 (24)	SIG-58-2(4-61)	516-58-2 (6-81)	Sic-36-3 (8'-16)		Relinquished by: (S	C'EXEN h	Calund	Remarks: See Ch



Appendix C Raymark Waste Definition

# **DEFINITION OF RAYMARK WASTE**

# **Raymark Industries, Inc. Superfund Site**

# Stratford, Connecticut

The 33.5 acre Raymark Industries Inc. Superfund Site (Site) located in Stratford, Connecticut, has a long history of disposal of Raymark waste. Low lying areas on the property were filled in with Raymark waste for facility building expansions between 1919 and 1974. The Raymark waste used as fill was the by-product of on-site manufacturing operations and has been determined to contain volatile organic compounds, semi-volatile organic compounds, asbestos, lead, copper, and other metals, waste acids (pickling waste from metal parts cleaning), caustics (used to clean process kettles), and PCBs.

During the initial investigations of the Site, the on-site soils were characterized as fill (imported and process), native materials, and peat. These distinctions were the result of soil borings and an attempt to develop an understanding of which soils contained Raymark waste (ELI RCRA Facility Investigation Report, February 10, 1995) (See Attached Table 1).

When the on-site drilling was occurring, the soils that were categorized as fill were identified as either a granular imported fill (oftentimes with construction debris) or a fibrous process fill (manufacturing waste). The distinctions in fill type are described below:

**Imported fill** – consisted predominately of sand, or sand and gravel, and may have included construction material (i.e. bricks, metal, etc). The level of chemical constituents (contamination) detected within this fill were generally lower (by an order of magnitude) than the process fill. Generally, imported fill was found directly below the pavement at over seventy-five percent of the Site (due to the systematic filling of the property over the years) and varied in thickness from one to two feet. Because the imported fill overlaid the process fill it is considered to have been placed in its location more recently than the process fill.

**Process fill** – consisted of a black, fine grained aggregate that contained asbestos. This unit was typically fibrous and spongy in nature and contained asbestos rope, metal wire, and friction material fragments (brake liners). The distinguishing feature of this material was the visible asbestos fibers and black organic material that is similar in texture to peat. The process fill was found on approximately fifty percent of the Site, usually beneath the imported fill.

Data in historic reports presenting the results of these soil borings indicated that both fill units contained contamination, however, the process fill contained more of the manufacturing wastes from Raymark. In 2004, EPA, in consultation with CTDEP and a technical consultant of the Raymark Advisory Committee (RAC), performed an evaluation of the OU1 soil sampling results comparing historic data of process fill in an effort to develop a definition of Raymark waste (See Attached Table 1). From EPA's previous sampling and work at the Site, it was known that lead, asbestos, PCBs, and copper were the most common constituents of Raymark waste. The 2004 effort focused on these four constituents in an effort to determine the frequency of finding concentrations above risk based levels and to evaluate the frequency of these four constituents being located together (co-location). The risk based levels were lead above 400 ppm (residential exposure level), asbestos above 1% (NESHAPS criteria for indoor workplace), PCBs (Aroclor 1268 only) above 1 ppm (residential exposure level), and copper above 288 ppm (10x background, not risk based). These four constituents were individually found in a high percentage of the samples as follows:

- Lead above 400 ppm was found in 22 of the 27 samples;
- Asbestos (chrysotile only) above 1% was found in 27 of the 27 samples;
- Copper above 288 ppm was found in 23 of the 27 samples; and
- PCBs (Aroclor 1268) above 1 ppm were found in 19 of the 22 samples.

The issue of co-location of the individual constituents was then evaluated. Individually, lead above background (81 ppm) was found consistently in process fill (96% frequency, 26 of 27 samples) as was asbestos above 1% (100% frequency, 27 of 27 samples). However, a strong relationship was observed in their co-location (97% frequency, 26 of 27 samples). When the risk based level of 400 ppm for lead was applied (with asbestos remaining greater than 1%), their relationship remained significant (81% frequency, 22 of 27 samples). Because it was known that both lead and asbestos were widely used by Raymark in their manufacturing processes and because of the frequency of co-location of these two constituents, both lead and asbestos were determined to be inherent components in the identification of Raymark waste. These two constituents alone, however, were not unique to Raymark. Other manufacturers in Stratford (Tilo Industries, Carpenter Steel, and perhaps others) had also disposed of manufacturing wastes as fill throughout the Town that contained asbestos and/or lead as well.

Other constituents that were also used widely in the manufacturing processes at Raymark were then examined. Individually, copper 10x background (288 ppm) was found fairly consistently in process fill (85% frequency, 23 of 27 samples) as was PCBs (Aroclor 1268) above background (background was non-detect) (100% frequency, 27 of 27 samples). The following observations

were made concerning the co-location of copper and PCBs (Aroclor 1268) with that of lead and asbestos:

- The frequency of co-location of lead (400 ppm), asbestos (greater than 1%), <u>and</u> copper (above 288 ppm) was slightly less (78% frequency, 21 of 27 samples) than that of lead and asbestos alone (81% frequency, 22 of 27 samples).
- The frequency of co-location of lead (400 ppm), asbestos (greater than 1%), <u>and</u> PCBs (Aroclor 1268) was also slightly less (77% frequency, 17 of 22 samples) than that of lead and asbestos alone (81% frequency, 22 of 27 samples).
- The frequency of co-location of lead (400 ppm), asbestos (greater than 1%), <u>and either</u> copper (288 ppm) <u>or</u> PCBs (Aroclor 1268) was found to be the same as that of lead and asbestos alone (81% frequency, 22 of 27 samples).

With the frequency of the co-location of either copper and/or PCBs (Aroclor 1268) with both lead and asbestos (81%) being similar to that of observing just lead and asbestos together (81%), a definition of Raymark waste was determined. Given that there are other possible non-Raymark sources of lead and asbestos, requiring either copper and/or PCBs (Aroclor 1268) to be co-located with both lead and asbestos, provides further certainty that the waste originated from the former Raymark facility.

Based on the above, the following is the definition of Raymark waste:

Raymark waste in soil is defined as a single soil sample containing lead above 400 parts per million (ppm), and asbestos (chrysotile only) greater than 1 percent, and either copper above 288 ppm or polychlorinated biphenyls (PCBs) (Aroclor 1268 only) above 1 ppm.

While other contaminants are present in Raymark waste, these four constituents are used as a "fingerprint" to identify Raymark waste locations. Again, the frequency of process fill meeting this definition was 81% (22 of 27 samples).

# TABLE 1

#### EVALUATION OF SOIL RESULTS FROM RAYMARK OU1 LEAD, ASBESTOS, COPPER AND AROCLOR 1268 IN COLOCATED SAMPLES RAYMARK INDUSTRIES, INC. SITE STRATFORD, CONNECTICUT

				Proc	ess Fill			Import		Native Materials				
					Copper	Aroclor 1268			Copper	Aroclor 1268	Lead		Copper	Aroclor 1268
BORING	DEPTH_RANGE	Raymark Waste Present?	Lead (mg/kg)	Asbestos(%)	(mg/kg)	(ug/kg)	Lead (mg/kg)	Asbestos(%)	(mg/kg)	(ug/kg)	(mg/kg)	Asbestos(%)	(mg/kg)	(ug/kg)
MW G4	2 - 10	No					23.2	5	34.4	2800				
MW I4	0 - 6	No					197	10	116	1200				
MW J4	2 - 8	Yes	26000	20	28000	4300								
MW K4-1	2 - 4	Yes	23500	10	23900	60000								
MW K4-1	6 - 12	No	284	5	257									
MW L4	2 - 8	Yes	52700	20	1580									
MW M4	4 - 8	Yes	10900	10	8520	97000								
MW O4	2 - 4	Yes					3840	5	4010					
MW W4	2 - 8	Yes	34500	15	16900	130000								
SB 1	2 - 6	Yes	10800	10	7220	2800								
SB 6	4 - 10	Yes	16200	10	7530	43000								
SB 7	8 - 12	Yes	16700	15	7680	750000								
SB 8	4 - 10	Yes	10300	15	19900									
SB 9-1	0 - 2	Yes					5840	10	18300	6200				
SB 10	2 - 6	No	374	5	113	6400000								
SB 12	6 - 10	Yes	8760	10	13200									
SB 13	2 - 6	Yes	31700	20	19300	16000								
SB 14	1 - 2	Yes	1910	15	1960	15000								
SB 19	6 - 10	Yes	2450	10	4050	1000								
SB 20	6 - 8	Yes	47100	15	56900	150000								
SB 21	2 - 8	Yes	33000	15	8510	150000								
SB 23	3 - 5	Yes					900	15	65.5	4800				
SB 24	2 - 6	No	122	5	440	2700								
SB 26	4 - 8	Yes	16500	15	2480	130000								
SB 26-1	0.5 - 2	No					57.2	20	49	25000				
SB 29	3 - 5	No					206	5	22.6	177				
SB 30	0.583 - 3	Yes					5060	5	2380	60000				
SB 30	5 - 7	Yes	43800	20	3360	450000								
SB 33	1 - 4	Yes					740	10	4100	1100				
SB 41	4 - 6	Yes	1990	25	82.7	160000								
SB 42	0 - 6	Yes	2530	15	2970	39000								
SB 44	1.5 - 4	No					320	5	360	1100				
SB 47	2 - 4	No					208	5	46.6					
SB 48-2	1 - 2	Yes					3180	20	1220	99000				
SB 48-2	5 - 6	No	319	10	8240	380								
SB 49	8 - 9.5	Yes									2090	10	713	
SB 50	2 - 6	No					151	10	55.1	2700				
SB 52-1	2 - 6	Yes	7940	15	19200									
SB 54	2 - 6	Yes	5220	20	3300	2300								
SB 55	2 - 6	No	1				149	5	14.8	3300				
SB 58	2 - 4	No	İ				8.9	5	16	0				
								-		-				

# TABLE 1

#### EVALUATION OF SOIL RESULTS FROM RAYMARK OU1 LEAD, ASBESTOS, COPPER AND AROCLOR 1268 IN COLOCATED SAMPLES RAYMARK INDUSTRIES, INC. SITE STRATFORD, CONNECTICUT

				Proc	ess Fill			Import	ed Fill		Native Materials				
					Copper	Aroclor 1268			Copper	Aroclor 1268	Lead		Copper	Aroclor 1268	
BORING	DEPTH_RANGE	Raymark Waste Present?	Lead (mg/kg)	Asbestos(%)	(mg/kg)	(ug/kg)	Lead (mg/kg)	Asbestos(%)	(mg/kg)	(ug/kg)	(mg/kg)	Asbestos(%)	(mg/kg)	(ug/kg)	
SB 60	1 - 4	No					297	5	228	1800					
SB 68	4 - 8	Yes	30200	10	13400	230000									
SB 70	4 - 8	No					5.2	15	17.5	40					
SB 71	2 - 4	No					18	0	13.9	470					
SB 75	5 - 6	No					1.7	0	13.5	0					
SB 77	1 - 4	No					79.9	10	63.8	4400					
SB 77	5.25 - 8	No	55.2	10	146	220									
		# Samples	27	27	27	22	20	20	20	18	1	1	1	0	
		27	27	27	22	20	18	20	16	1	1	1	0		
		minimum concentration (mg/kg	55	5	83	220	2	0	14	0	2,090	10	713	0	
		maximum concentration (mg/kg	52,700	25	56,900	6,400,000	5,840	20	18,300	99,000	2,090	10	713	0	
		mean concentration (mg/kg)	16,143	14	10,338	401,532	1,064	8	1,556	11,894	2,090	10	713		
		median concentration (mg/kg	10,800	15	7,530	51,500	202	5	59	2,250	2,090	10	713		
		# Samples>bkg	26 (96%)	27 (100%)	27 (100%)	22 (100%)	13 (65%)	18 (90%)	14 (70%)	16 (89%)	1 (100%)	1 (100%)	1 (100%)	NA	
		# Samples>10xbkg	22 (81%)	27 (100%)	23 (85%)	22 (100%)	7 (21%)	18 (90%)	6 (30%)	16 (89%)	1 (100%)	1 (100%)	1 (100%)	NA	
		# Samples>100xbkg	16 (59%)	27 (100%)	19 (70%)	22 (100%)	0 (0%)	18 (90%)	3 (15%)	16 (89%)	0 (0%)	1 (100%)	0 (0%)	NA	
	#	Samples>Raymark Waste Criterion	22 (81%)	27 (100%)	23 (85%)	19 (86%)	6 (30%)	18 (90%)	5 (25%)	13 (72%)	1 (100%)	1 (100%)	1 (100%)	NA	
	# 5	Samples with Lead>bkg where Asb>1		26 of 2	27 (97%)			13 of 20		1 of 1 (100%)					
	# Samples	s with Lead>400 mg/kg where Asb>1		22 of 2	27 (81%)			6 of 20		1 of 1 (100%)					
# Sampl	es Meeting the Def	finition of Raymark Waste (Exceeding													
-		lead, asbestos, and copper		21 of 2	27 (78%)			5 of 20		1 of 1 (100%)					
# Sampl	es Meeting the Def	inition of Raymark Waste (Exceeding													
			17 of 2	22 (77%)			5 of 18		0 of 0 (0%)						
# Sampl	es Meeting the Def	finition of Raymark Waste (Exceeding													
	lead, asbesto	os, and either copper or Aroclor 1268		22 of 2	?7 (81%)			6 of 20		1 of 1 (100%)					

Notes:

-Evaluated data only include Phase IIB soil samples collected by ELI from OU1.

-Bolded values exceed the criterion from the Raymark Waste definition (400mg/kg lead; 1% asbestos; 288 mg/kg copper; 1,000 ug/kg Aroclor 1268).

-Background (bkg) lead and copper concentrations were calculated as the average of results from samples collected at schools, daycare facilities and parks where it was assumed Raymark waste was not disposed (80.8 mg/kg lead;28.8 mg/kg copper; No PCBs and No asbestos).

-48 samples were analyzed for both lead and asbestos. Only 2 samples analyzed for asbestos had no asbestos. Those samples also had lead less than background.

-26 of 27 samples from process fill contained lead above background and asbestos >1.

-22 of 27 samples from process fill contained lead above 400 mg/kg and asbestos >1.

-22 of 27 samples from process fill met the definition of Raymark Waste.