



Proactive by Design

GEOTECHNICAL

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October 3, 2017
File No. 05.P000361.18

Attorney Lee Hoffman
Pullman & Comley, LLC
90 State House Square
Hartford, CT 06103-3702

Re: Tobacco Valley Solar, Simsbury, CT

Dear Attorney Hoffman:

GZA GeoEnvironmental, Inc. (GZA) has reviewed several documents regarding the proposed Tobacco Valley Solar project in Simsbury, CT (Site) related to the filings made in Siting Council Petition 1313. GZA is providing our opinion regarding the potential for pesticide residues located at the Site to impact nearby wells or the aquifer as a result of the construction of the project contemplated in Petition 1313. This letter is subject to the attached Limitations and the Terms & Conditions of our contract.

As you are aware, GZA conducted a Phase I Environmental Site Assessment (ESA) at the Site in March 2016 which indicated that the Site consists of five (5) adjacent parcels (totaling approximately 289 acres) located on County Road, Hopmeadow Street and Hoskins Road in a primarily residential section of Simsbury, Connecticut. At the time of the ESA, three of the Site parcels (parcels 1, 3 and 5) were being used as agricultural fields for growing vegetables and appeared to have been historically used for tobacco farming. Parcels 2 and 4 have historically consisted of undeveloped wooded land. The ESA identified the potential for residual pesticides to be present in soil and/or groundwater as a result of current or historical Site use.

Testing was not completed at the Site by GZA, nor were any results of previous testing available. However, we note that the Site has been open to infiltration of rainwater for decades and that any leachable soil contaminants, if present, would have long since leached to groundwater and potentially migrated to receptors, if present. GZA notes that, in general, most pesticides adsorb to soil particles, become immobile, and do not leach.

DWW Solar II, LLC has proposed to construct a 26.4-megawatt solar photovoltaic electric generating facility on the Site. Based on plans, dated June 2017 and designed by VHB, GZA understands the project consists of the installation of ground-mounted solar panels, equipment pads, and underground utilities. Other improvements will include access roads covered with crushed stone and fences. Some of these improvements will require penetrations to the subsurface.



It has been GZA's experience that most historically-applied pesticides are present in the upper six inches to one foot of soil. This shallow soil would likely be displaced horizontally as a result of such penetrations rather than driven deeper. Most pole mounted supports are essentially screwed into the ground or through a base into the ground and go several feet. Therefore, it is unlikely that penetrations of the supports would have an adverse impact on local wells or aquifers. Based on our review of VHB's plans, GZA understands that while some regrading of the soil will be conducted, no soil removal will be required.

Provided that a Soil Management Plan (SMP) that includes plans for dust control, erosion control, storm water management, and handling and management of disturbed soil, is implemented during construction activities, it is GZA's opinion that the potential for pesticide residues located at the Site to impact nearby wells or the aquifer as a result of the construction of the project is low.

We hope this information is useful to you. If you have any questions, please contact us.

Very truly yours,

GZA GEOENVIRONMENTAL, INC.

Handwritten signature of Adam T. Henry in blue ink.

Adam T. Henry, LEP
Associate Principal

Handwritten signature of Gordon T. Brookman in blue ink.

Gordon T. Brookman, LEP
Principal

Attachment: Limitations

REPORT REVIEW LIMITATIONS

1. The conclusions presented in the report were based solely upon information obtained from our review of reports prepared by others and provided to us by Client. Our review was carried out in accordance with the Statement of Terms and Conditions that was attached to the proposal/contract for this project.
2. In preparing this report, GZA has relied on certain information provided by other parties referenced therein, and on information contained in reports made available to GZA. GZA did not attempt to independently verify the accuracy or completeness of all information reviewed or received during the course of this review.
3. GZA has not performed a site visit as part of the preparation of this report. GZA renders no opinion as to the presence of hazardous material or oil, or to the presence of indirect evidence relating to hazardous material or oil, on the site which has not been discussed in reports provided to us for review.
4. GZA did not perform any independent testing or analyses to determine the presence or concentrations of asbestos, hazardous materials or petroleum products in the site building or the environment.
5. The purpose of this report was to summarize information contained in previous reports regarding potential environmental issues and areas which would may further evaluation to determine whether or not release(s) to the environment have occurred. No attempt was made to check on the compliance of present or past owners or operators of the site with federal, state, or local laws and regulations, environmental or otherwise.
6. Except as noted within the text of the report, no quantitative laboratory testing was performed by GZA as part of this review. Where such analyses have been conducted by others, GZA has relied upon the data provided, and has not conducted an independent evaluation of the reliability of these data.
7. It should be noted that variations in the types and concentrations of contaminants and variations in their flow paths may occur due to seasonal water table fluctuations, past disposal practices, the passage of time, and other factors. Should additional chemical data become available in the future, these data can be reviewed by GZA, and the conclusions and recommendations presented herein modified accordingly.