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LEED Green Associate

October 5, 2017

***VIA FEDERAL EXPRESS AND
ELECTRONIC MAIL***

Melanie.bachman@ct.gov
Siting.council@ct.gov

Ms. Melanie A. Bachman, Esq., Executive Director
Connecticut Siting Council
Ten Franklin Square
New Britain, CT 06501

Re: Petition 1313 – DWW Solar II, LLC Petition for Declaratory Ruling that No Certificate of Environmental Compatibility and Public Need Is Required for A 26.4 Megawatt AC Solar Photovoltaic Electric Generating Facility in Simsbury, Connecticut

Dear Attorney Bachman:

This office represents the Town of Simsbury (“Town”). On behalf of the Town, I have enclosed a supplemental disclosure to the interrogatories propounded by DWW Solar I, LLC, specifically a report prepared by Zuvic • Carr and Associates, Inc. (“Zuvic Carr”), dated October 5, 2017. The report pertains to Zuvic Carr’s review of certain Town records and files from the Department of Energy & Environmental Protection. I have enclosed an original and fifteen copies.

Please do not hesitate to contact me with any questions.

Very truly yours,

Jesse A. Langer

Enclosures

cc: *Service List (via regular mail and electronic mail)*

Updike, Kelly & Spellacy, P.C.
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October 5, 2017

Jerome F. Shea, Town Engineer
Town of Simsbury
933 Hopmeadow St.
Simsbury, CT. 06070

RE: Review of Town and CT DEEP Files
DWW Solar II, LLC – Tobacco Valley Solar Project

Dear Mr. Shea:

On behalf of the Town of Simsbury, Zuvic, Carr and Associates, Inc. (Zuvic Carr) conducted a review of certain Town records and State environmental regulatory files associated with the above-referenced project (DWW project). The project site is shown on the attached Figure 1. Specifically, Zuvic Carr reviewed the following files:

- Water testing records for private drinking water wells in the vicinity of the DWW project site, provided by Town Engineering staff; and,
- Files relating to potential releases of hazardous materials to soil and groundwater at the DWW project site, at the Connecticut Department of Energy and Environmental Protection (CT DEEP).
- CTDEEP archived files, maintained at the CT State Library relating to potential releases of hazardous materials to soil and groundwater in the vicinity of the DWW project site.

Additionally, Zuvic Carr reviewed land deed records provided by the Town, pertaining to 45 Hoskins Road.

Water Testing Records

Zuvic Carr reviewed documentation regarding private drinking water well testing completed by the Farmington Valley Health District, the Town of Simsbury or the State of Connecticut during the mid-1980s for properties within a 500 ft. buffer of the DWW project site. The project site and properties within the 500 ft. buffer are shown in the attached Figure 2.

During the 1980s, various wells were sampled on Centerwood Road, Gordon Street, Howard Street, Knollwood Circle and County Road. In addition, there is information in the files indicating that select wells, including those at 15 and 20 Centerwood Road, were sampled by the Connecticut Department of Environmental Protection (CT DEP) in 2003. Also, wells located at 1, 7, 8, 13, 17, 18 and 23 Centerwood Road; 2, 3, 8, 10, 11, 14, 16, 22, 24 and 28 Gordon Street; 2 and 3 Howard Street; and, 7,

8, 11, 13, 15, 17, 19 and 24 Knollwood Circle were apparently sampled in 2004. The results of testing completed in 2003 and 2004 were not contained in the files reviewed by Zuvic Carr. Information concerning potential testing of other wells within 500 ft. of the project site was not present in information reviewed by Zuvic Carr.

Water in wells located at the addresses below contained the pesticides Vorlex (with active ingredients 1,3-dichloropropene, 1,2-dichloropropane and methyl isocyanate) and/or ethylene dibromide (EDB) during one or more of the sampling events conducted in the 1980s. These properties are shown on Figure 2. With the exception of the property on County Road, the properties are topographically downgradient of the former tobacco fields in the northern portion of the project site. The County Road property is topographically downgradient of tobacco fields located west of the southern portion of the project site. Vorlex and EDB were used as pesticides in tobacco cultivation, and were present in water samples collected from wells at the following locations:

- 7 Knollwood Circle;
- 1 Centerwood Road;
- 7 Centerwood Road;
- 25 Gordon Street;
- 5 Howard Street; and,
- 32 County Road.

Based on the results of testing completed in the 1980s, other wells located on County Road and Gordon Street, which are outside of the 500 ft. buffer, were contaminated with Vorlex and/or EDB.

Note that the information reviewed contained results of testing of many properties located near tobacco fields approximately one to two miles west of the project site in the 1980s, 1990s and 2000s. Water in many of the wells tested was contaminated with Vorlex and/or EDB.

Zuvic Carr also reviewed the CT DEEP Leachate and Wastewater Discharge Sources map, compiled December 1991, for information concerning drinking water well contamination in the area of the project site. The following two properties, located within the project site or the 500 ft. buffer of the project site, are shown on the map with wells contaminated with Vorlex:

- 8 Knollwood Circle; and,
- Western portion of the former 45 Hoskins Road property and part of the project site.

In addition, municipal Village Water Well #5, located approximately 0.5 miles east of the project site, is shown on the map, and was contaminated with EDB in 1984.

Review of CT DEEP Archived Files at CT State Library

On September 28, 2017, Zuvic Carr visited the CT State Library to review the following CT DEEP archived files:

H:\Projects\1925 - Town of Simsbury, Tobacco Valley Solar Project\Correspondence\Letters\CTDEEP File Review Results 100317 final.docx

- Bureau of Water Management Correspondence files for the Town of Simsbury from 1926 – 1990
- Simsbury Miscellaneous folders from 1936 (sic)- 1979
- Simsbury Well Contamination files – 1979

Other files were reviewed that did not pertain to the Project site area. No pertinent information related to the Project site area was found during the file review.

Review of CT DEEP Files

On September 28, 2017, Zuvic Carr visited the CT DEEP Public File Room and requested water compliance, hazardous waste, underground storage tank and remediation-related files for Simsbury under the following names:

- Culbro
- General Cigar
- Farm #2
- Hall Farm

The CT DEEP files contained several remediation related documents pertaining to the Project site area. The pertinent documents are described below.

"Preliminary Report – Pesticide Disposal Area, Culbro Corporation", dated April 1986, and prepared by Fuss & O'Neill, Inc. (F&O). This report investigated possible pesticide disposal areas located on Culbro tobacco farms in Simsbury and East Granby, Connecticut. One of the farms investigated was Hall Farm, which comprises project parcels 1-4 (a map of Hall Farm was included as part of the report). The report indicated that waste pesticides, which were buried on-site, and contaminated soil would be excavated and disposed from the properties including Hall Farm. A copy of the report is attached.

"Letter from James Ray of CT DEP to Maurice R. Hamel of F&O on the Proposed Remediation of Pesticide Areas, Culbro Corporation", dated November 21, 1986. This letter requested additional information before authorizing the removal and disposal of pesticides and contaminated soil at the farm sites. Additionally, the letter indicated that DEP did not feel that the proposal would adequately define past disposal or the ?rate, degree, and extent of soil, groundwater and surface water contamination. A copy of the letter is attached.

"Hall Farm Disposal Site – Pesticide Disposal Site Remediation – Culbro Tobacco Farm #2", dated March 1992, and prepared by F&O. This report details pesticide and contaminated soil excavation and disposal activities at the Hall Farm pesticide disposal site. The report indicates that 132, 55-gallon drums of spoiled pesticide were disposed as a hazardous waste (Codes D004, P123, U233, and U036). Additionally, approximately 153 cubic yards (CY) of hazardous waste soil was excavated and disposed off-site over a period of several months. Monitoring wells were installed as part of the investigation work, and groundwater samples were collected and analyzed for pesticide-related constituents. Based on the site map in the report, the pesticide disposal area was located just off the Project site, east of parcel 3. A copy of the report is attached.

"Appendix M – Groundwater Sampling Results, September 7, 1990 – Culbro Tobacco Hall Farm Disposal Site, Simsbury, CT". This document includes the analytical results of groundwater samples

presumably collected from monitoring wells in the vicinity of the Hall Farm disposal site in September 1990. A copy of this document is attached.

"Groundwater Sample Results, Hall Farm, Simsbury, CT", dated April 8, 1992 and prepared by F&O. This report includes the results of groundwater samples collected from monitoring wells in the vicinity of the Hall Farm disposal site in January 1992. A copy of this report is attached.

"Memorandum from Craig Parks, PERD, DEP to Elsie Patton, Water Management Bureau, DEP, regarding PERD review of Culbro Hall Farm Site (Simsbury, CT)", dated April 22, 1994. This internal memo summarizes a review of the environmental status of the pesticide disposal site area at the Hall Farm site by Mr. Parks. Mr. Parks concluded that he could "not determine the environmental conditions on any other parts of the site, based on the information on file at the department". A copy of the memorandum is attached.

Findings

The contaminated drinking water well at 45 Hoskins Road is a Recognized Environmental Condition (REC) pertinent to the project site. The contaminated wells on Knollwood Circle, Centerwood and County Road, and Gordon and Howard Streets are off-site RECs. Well water in the area of the project site that is contaminated with pesticides used in tobacco cultivation indicates the presence of Areas of Concern (AOCs) at the project site.

The hazardous waste manifests included in the "Hall Farm Disposal Site – Pesticide Disposal Site Remediation – Culbro Tobacco Farm #2" were cross-referenced with the hazardous waste generator summary report for Generator EPA ID CTP000010194 that was included in the GZA Phase I ESA report, dated March 2016. Four of the five manifests in the disposal report matched the manifests listed in the generator summary report. The matched manifests indicate that despite the generator summary listed address as "Hoskins Rd", the actual address for EPA ID CTP000010194 was the Hall Farm site.

The lone manifest not included in the 1994 Hall Farm Site disposal report but listed in the generator summary related to 1,966 gallons of corrosive hazardous waste (Manifest RIS0017082) that was shipped from the site in March 1998, approximately eight years after soil remediation was completed at Hall Farm.

The information obtained by Zuvic Carr's file review further demonstrates that the potential environmental impacts posed by the proposed solar project are unknown. There are significant data gaps in the conceptual site model (CSM) presented by DWW that would prevent proper mitigation of environmental hazards related to the development of the site. For example, there is little to no information related to former operations at the project site, including the handling and storage of various pesticides, and what releases may have occurred to site soil, groundwater or surface water bodies as a result of those former activities. This conclusion was apparently shared by CT DEP staff¹.

Zuvic Carr recommends that additional assessment and investigation of the Project site be conducted including a comprehensive review of former site operations to develop a better

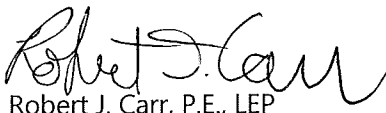
¹ Page 3, CT DEP Memo dated April 22, 1994

understanding of pesticide handling and storage practices at the Project site, and the collection and analysis of soil, groundwater, and sediment from potential release areas. The results of the expanded assessment should be used to develop a project specific soil management plan (SMP) that would mitigate environmental impacts from the excavation, storage, disposal, and regrading of site soil.

Please contact the undersigned at 860-436-4901 if you have any questions.

Sincerely,

Zuvic, Carr and Associates, Inc.



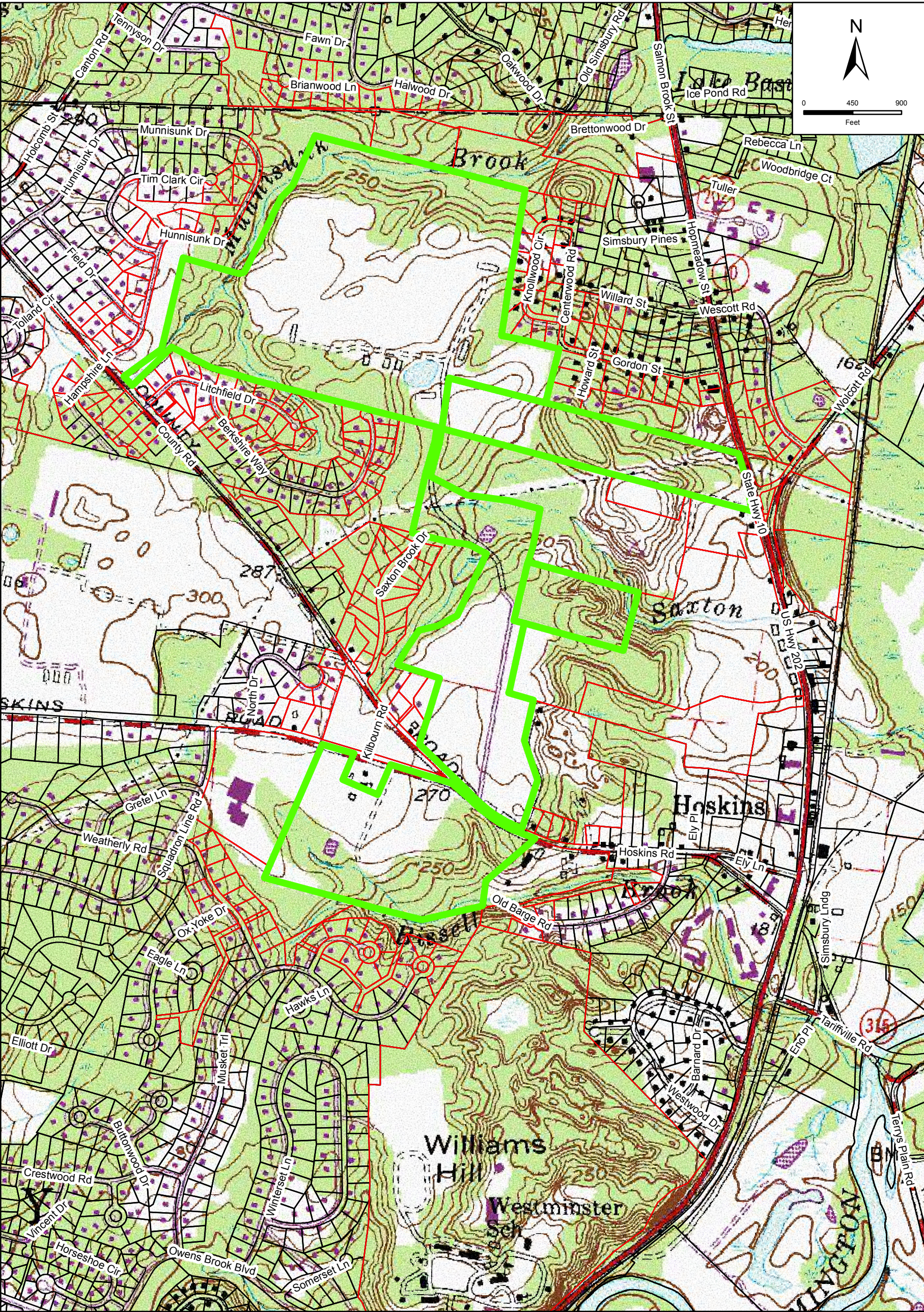
Robert J. Carr, P.E., LEP
Vice President

Attachments: Figure 1 – Project Site Location Map
Figure 2 - Properties with Known Drinking Water Well Contamination Within 500 Feet of the Project Site

Reports Previously Submitted:

"Preliminary Report – Pesticide Disposal Area, Culbro Corporation", dated April 1986
"Letter from James Ray of CTDEP to Maurice R. Hamel of F&O on the Proposed Remediation of Pesticide Areas, Culbro Corporation", dated November 21, 1986
"Hall Farm Disposal Site – Pesticide Disposal Site Remediation – Culbro Tobacco Farm #2", dated March 1992
"Appendix M – Groundwater Sampling Results, September 7, 1990 – Culbro Tobacco Hall Farm Disposal Site, Simsbury, CT"
"Groundwater Sample Results, Hall Farm, Simsbury, CT", dated April 8, 1992
"Memorandum from Craig Parks, PERD, DEP to Elsie Patton, Water Management Bureau, DEP, regarding PERD review of Culbro Hall Farm Site (Simsbury, CT)", dated April 22, 1994

C: Lisa Heavner – Simsbury First Selectman
Jesse Langer, Esq. – Updike, Kelly and Spellacy



SITE LOCATION



- LEGEND
- Site
 - Parcels within 500 feet of the Site
 - Site Location

MAP REFERENCES

1. Parcel, hydrography, and road information from Connecticut Environmental Conditions (CT ECO) Online: <http://www.cteco.uconn.edu/> Accessed October 2017.

2. Parcel data is based on Town of Simsbury Online GIS map viewer: http://simsbury.mapxpress.net/ags_map/ Accessed October 2017.

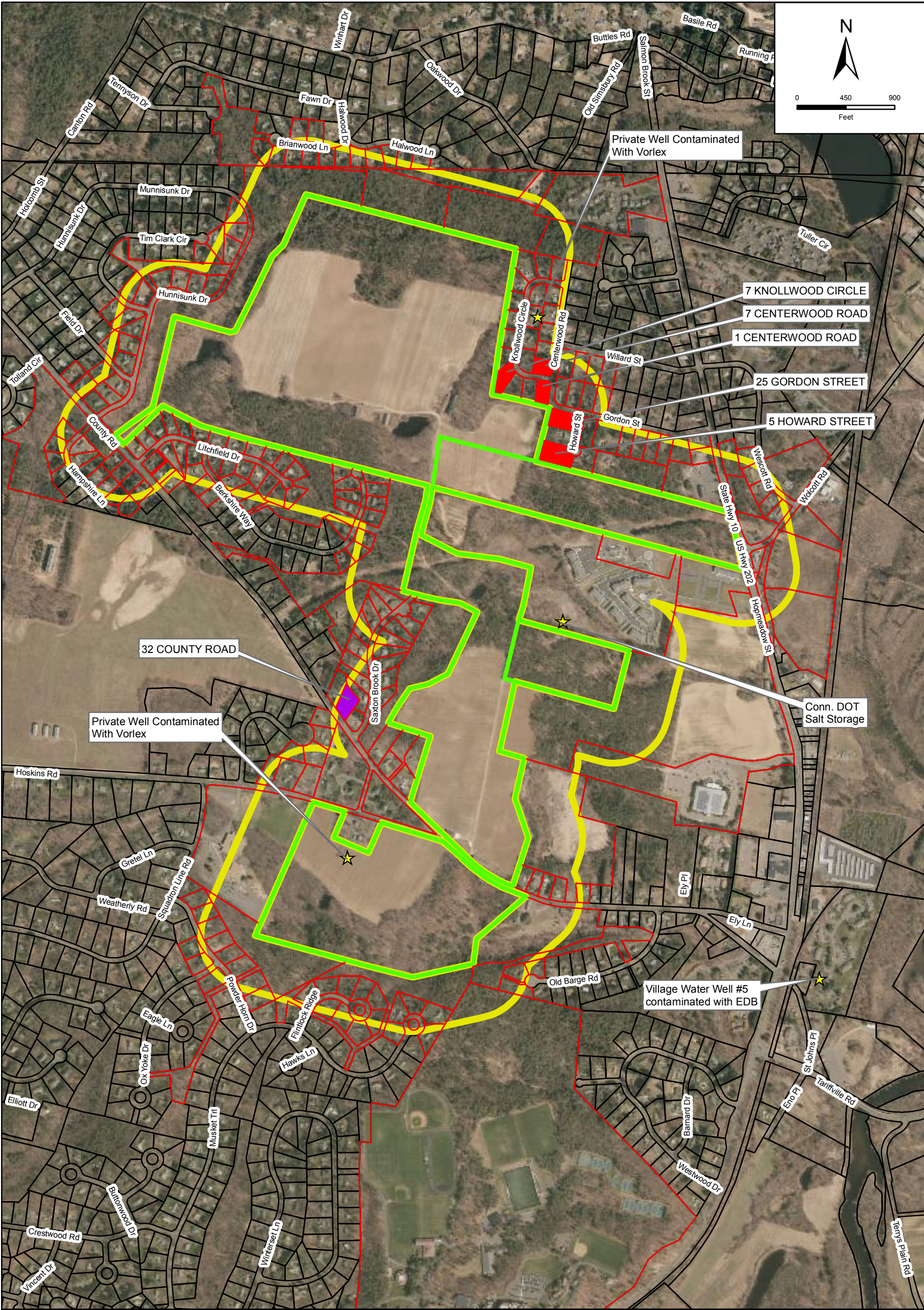
3. USGS Topographic Map, Hartford County, Tariffville Quadrangle Map # 21 from the USDA NRCS Geospatial Gateway: <https://datagateway.nrcs.usda.gov/> Accessed October 2017.







PROJECT SITE LOCATION MAP

DWW SOLAR II - TOBACCO VALLEY SOLAR PROJECT
SIMSBURY, CONNECTICUT

PREPARED FOR:	TOWN OF SIMSBURY 933 HOPMEADOW STREET SIMSBURY, CT, 06070		
PREPARED BY:	ZUVIC, CARR & ASSOCIATES, INC. 40 COLD SPRING ROAD, ROCKY HILL, CT OFFICE (860) 436-4901 FAX (860) 436-4953		
SCALE: 1 in = 900 ft	DATE: OCTOBER 3, 2017	PROJECT NO.: 1925	FIGURE 1

PROJECT NUMBER: 1925 DATE: OCTOBER 3, 2017 / FILE NAME: PROPERTIES WITH KNOWN DRINKING WATER WELL CONTAMINATION WITHIN 500 FEET OF THE PROJECT SITE



LEGEND			
	Site		Private well contaminated with Vorlex
	500 foot buffer around the Site		Private well contaminated with EDB
	Parcels within 500 feet of the Site		Leachate and Wastewater Discharge Sources (address not reported)
MAP REFERENCES			
1. Parcel, hydrography, and road information from Connecticut Environmental Conditions (CT ECO) Online: http://www.cteco.uconn.edu/ Accessed October 2017.			
2. Parcel data is based on Town of Simsbury Online GIS map viewer: http://simsbury.mapxpress.net/ags_map/ Accessed October 2017.			
3. Aerial imagery accessed from CT ECO ArcGIS Image Service: URL: https://cteco.uconn.edu/ctraster/services/images/Ortho_2016_tiled/ImageServer Accessed October 2017			
4. Leachate and Wastewater Discharge Sources accessed October 2017 from UCONN Map and Geographic Information Center: http://magic.lib.uconn.edu/magic_2/vector/37800/leachatewastewaterdischargepointct_37800_0000_1997_s50_ctdep_1_shp.zip/ Accessed October 2017			
PROPERTIES WITH KNOWN DRINKING WATER WELL CONTAMINATION WITHIN 500 FEET OF THE PROJECT SITE			
DWW SOLAR II - TOBACCO VALLEY SOLAR PROJECT SIMSBURY, CONNECTICUT			
PREPARED FOR:	TOWN OF SIMSBURY 933 HOPMEADOW STREET SIMSBURY, CT, 06070		
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SCALE: 1 in = 900 ft	DATE: OCTOBER 3, 2017	PROJECT NO.: 1925	FIGURE 2