

NEPA ENVIRONMENTAL REVIEW REPORT

**Community Development Block Grant – Disaster Recovery
Owner-Occupied Rehabilitation and Rebuilding Program**

**Site ID No. 1034
51 Beckett Avenue
Branford, Connecticut**

January 2015

Ref. No. 104318/33/R01

Prepared for:

Merritt Construction Services, Inc.
1177 High Ridge Road
Stamford, CT 06905

Prepared by:



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1.0 - INTRODUCTION

Triton Environmental, Inc. (Triton) has prepared this National Environmental Policy Act (NEPA) evaluation for the property located at 51 Beckett Avenue in Branford, Connecticut (the site) on behalf of Merritt Construction Services, Inc. (Merritt). The location of the site is depicted on Figure 1. The NEPA review has been prepared as a required component of the Community Development Block Grant – Disaster Recovery (CDBG-DR) program for properties impacted by Superstorm Sandy. The CDBG-DR program, run by the U.S. Department of Housing and Urban Development (HUD), provides funding to address repairs to certain impacted Connecticut properties. In order to receive funding from HUD, an environmental review is required.

The project is considered “categorically excluded” from NEPA. However, the project is still subject to additional statutory requirements. As such, Triton has completed the Statutory Checklist for state and federal laws, regulations, and Executive Orders (other than NEPA) in accordance with 24 CFR 58.5 and 58.6. In addition, Triton has completed specific testing at the site, as described in detail in this report.

1.1 - Proposed Site Modifications and Work Zone

The two-story home was reportedly damaged when the decking was overwashed by 2.5 to 3 feet of waves from Long Island Sound and the basement was filled with water. The proposed work plan for the site includes raising the structure above the flood zone at its current location. As such, the work zone as described by Merritt consists of the interior of demolition of the basement and raising the structure above the FEMA flood zone elevation.

2.0 - PRELIMINARY INSPECTION AND RESOURCE REVIEW

2.1 - Preliminary Site Inspection

As a preliminary step in the NEPA evaluation, Triton completed an initial inspection of the site, focused on the work zone described in Section 1.1. The inspection was completed on December 18, 2014, by Mr. Brian Sirowich of Triton.

During the inspection, the following items were noted within the work zone that required further evaluation:

- Suspect asbestos-containing materials;
- Potential lead-based paint;
- Potential polychlorinated biphenyls (PCBs); and
- Potential mold.

Photographs of the work zone area are included as Appendix B.

2.2 - Preliminary Checklist Review

Following the initial site inspection, a preliminary statutory checklist review was completed in order to determine which items in the checklist did not apply to the site, and which items required additional evaluation and/or on-site surveys. As a component of the preliminary checklist review, Triton reviewed readily available resource maps, as well as online environmental databases. Copies of the maps reviewed are provided in Appendix A.

Based on the site inspection and the review of applicable public resource materials, each of the items identified on the Statutory Checklist have been assigned a code of “Not Applicable to This Project,” with the exception of the items identified below:

2.2.1 - Historic Properties (Item 1)

Consultation with the State Historic Preservation Officer (SHPO) is required. It is our understanding that a programmatic agreement between the Department of Housing (DOH), the SHPO, and the Advisory Council on Historical Preservation is under development.

2.2.2 - Flood Management/Coastal Zone Management Issues (Items 2, 4, 14A and 14E)

The site is located within a flood zone based on the FEMA Flood Insurance Rate Map 09009C0463J dated July 8, 2013. The site is located with an area mapped as an AE zone, which is within the 100-year flood zone.

The site is located within the coastal zone boundary. As such, a Coastal Area Management (CAM) Site Plan Review Application is required to be submitted to the Branford Zoning Commission (unless otherwise exempted). It is our understanding that the DEEP has approved a Flood Management Certificate (No. 201405290-FM) for all CDBG-DR projects. Work shall be conducted in accordance with the conditions of the Certificate.

2.2.3 - Endangered Species/Fish and Wildlife (Items 6 and 13B)

The site appears to be located on a waterfront with a sandy beach and is located in an area with State and Federal listed species and significant natural communities. The Red Knot was identified as threatened and the Roseate Tern was identified as endangered and located within the work zone. The US Fish and Wildlife Service has indicated that the proposed renovations will have no adverse effect on these species. However, consultation with the Department of Energy and Environmental Protection (DEEP) will be required.

2.2.4 - Lead-Based Paint (Item 13C)

Based on the site inspection, potential lead-based paint was observed within the work zone.

2.2.5 - Asbestos-Containing Materials (Item 13D)

Based on the site inspection, potential asbestos-containing materials were observed in the work zone.

2.2.6 - Mold (Item 13F)

Based on the site inspection, the potential for mold was identified within the work zone.

2.3 - Additional Items (Not Included in Statutory Checklist)

Although not specifically listed on the Statutory Checklist, Triton identified the following additional potential issue associated with the project:

- Based on the site inspection, potential PCB-containing building materials were observed in the work zone.

3.0 - HAZARDOUS MATERIALS EVALUATIONS

Based on the preliminary inspection of the subject property, the following hazardous materials surveys were completed.

3.1 - Work Zone Lead Inspection and Lead Hazard Risk Assessment

An inspection of potential lead-based paint was completed within the work zone such that the work can be completed safely and in accordance with the EPA's Renovation, Remodeling, and Painting (RRP) Rule as well as Occupational Safety and Health Organization (OSHA) requirements. The structure was reportedly constructed after 1978; therefore, a lead hazard risk assessment of the property in accordance with the United States Department of Housing and Urban Development (HUD) Lead Safe Housing Rule (24 CFR 35) was not required. The inspection was completed by a State of Connecticut certified lead inspector.

3.1.1 - XRF Lead Testing in Work Zone

As indicated in Section 1.1, the work zone as described by Merritt is considered to be the basement and first floor of the dwelling. Triton conducted testing of the work zone using X-Ray Fluorescence (XRF). The survey was completed by a Connecticut certified lead inspector. The survey was completed using a Niton XL-300A XRF instrument. XRF readings were taken at a total of 26 locations of 18 distinct building materials in the work zone. Appendix C contains a spreadsheet summarizing the results. The results of the XRF testing indicate that none of the painted building materials tested within the work zone contained lead concentrations greater than the action level of 1 mg/cm² (0.5% by weight).

3.2 - Asbestos Sampling

An asbestos survey was completed of the work zone on December 18, 2014. In accordance with the EPA National Emission Standards for Hazardous Air Pollutants (NESHAP) regulation 40 CFR Part 61 (Subpart M), a property owner must ensure that a thorough inspection for asbestos-containing materials is completed prior to possible

disturbance during renovation or demolition. A walk-through and inspection of the building was conducted by a Connecticut licensed asbestos inspector to identify suspect asbestos-containing materials (ACM). Once the location and quantity of each suspect ACM was documented, up to three representative samples of each suspect material were collected.

In accordance with EPA protocols, the samples of each suspect ACM were submitted to a State licensed laboratory and analyzed via the PLM method (EPA 600/R-93/116 Method). To avoid unnecessary sample analysis, the laboratory did not analyze duplicate homogeneous samples once asbestos was detected at concentrations greater than 1% in a related sample.

A total of four samples were collected from two homogeneous building materials within the work zone. Some samples were further subdivided at the laboratory for discrete testing resulting in the reporting of seven results. The results indicated that none of the building materials contained asbestos greater than one percent, which is considered non-asbestos-containing under NESHAP.

A roster of the building materials suspected of containing asbestos (and subsequent samples) is attached as Appendix D. The laboratory analytical report is attached in Appendix E.

3.3 - PCB Sampling

PCB sampling was conducted by Triton on December 18, 2014. Prior to sampling, Triton conducted a visual survey of the work zone for potential PCB-containing materials. A sampling plan was then developed in order to collect a set of samples that was representative of the various materials observed. Where a significant number of homogeneous window units are present, the EPA recommends that a minimum of 5% of windows be sampled to generate a statistically significant data set for each sealant type.

The following table summarizes the various types of materials that were observed, and the number of samples that were collected from each material type.

Sealant Material	Location	Number of Locations	Number of Samples Collected (5% Minimum)
Tan caulk	Basement closet	1	1

As indicated, one sample was collected from the work zone that is believed to provide a representative evaluation of the potential PCB-containing material observed. The sample was collected using hand tools (e.g. utility knife). The sample was analyzed for PCBs by EPA Method 8082 (using the soxhlet extraction method).

PCBs were not detected in the sample (PCB-1) collected from caulk in the basement closet. The laboratory analytical results are provided in Appendix E.

3.4 - Mold Inspection

Triton completed a visual mold inspection of the work area on December 18, 2014. Mold was not observed in the basement or first floor of the dwelling.

4.0 - CONCLUSIONS AND RECOMMENDATIONS

Based on the results of NEPA evaluation and specific on-site surveys, it has been determined that this project cannot convert to Exempt per § 58.34(a)(12) at this time because one or more statutes/authorities require consultation or mitigation, as follows:

1. Historic Preservation - Confirmation from the State Historic Preservation Officer is required that the project will not affect items of historic significance.
2. Flood Management/Coastal Zone Management Issues – The site is located within the coastal zone boundary. As such, a Coastal Area Management (CAM) Site Plan Review Application is required to be submitted to the Branford Zoning Commission (unless otherwise exempted). It is our understanding that the DEEP has approved a Flood Management Certificate (No. 201405290-FM) for all CDBG-DR projects. Work shall be conducted in accordance with the conditions of the Certificate.
3. Endangered Species – The site appears to be located on a waterfront with a sandy beach and is located in an area with State and Federal listed species and significant natural communities. The Red Knot was identified as threatened and the Roseate Tern was identified as endangered and located within the work zone. The US Fish and Wildlife Service has indicated that the proposed renovations will have no adverse effect on these species. However, consultation with the Department of Energy and Environmental Protection (DEEP) will be required.

The above items should be completed such that the project can transition to Exempt status per § 58.34(a)(12).

5.0 - LIMITATIONS

The tasks completed were performed specifically within the work zone that has been specified to Triton by the Merritt project manager (such zone may change as the project develops and re-inspection by Triton will be required). In addition, the scope of work was limited to those items that are part of the NEPA review process with the exception of PCB sampling, which was performed as an emerging concern regarding worker/occupant health and safety and for proper disposal practices. As such, Triton provides no warranty or opinion regarding conditions outside of the work area, or related to additional environmental conditions outside of the NEPA review process.

In some circumstances, Triton has relied upon available resource maps and/or visual observations to evaluate specific statutory items. In these circumstances, actual surveys have not been conducted. For example, a full wetland delineation and elevation survey with respect to the coastal jurisdiction line has not been completed. Rather, Triton has relied upon available inland wetland and tidal wetland maps (and visual observations) to complete this review.

The completion of the NEPA screen process does not constitute completion of an Environmental Assessment (EA) or a Phase I Environmental Site Assessment.

The ACM, LBP, radon, mold, and PCB inspections were completed for accessible materials within the work zone only (as defined in Section 1.1) and involved the use of selective sampling and non-destructive sampling techniques to access visible suspect materials. Although efforts were made to diligently inspect all windows and other building materials, in completing the material survey it should be noted that additional suspect materials or mold may be present behind or beneath building components that were not readily accessible. If suspect ACM-, LBP-, and PCB-containing materials are encountered during replacement activities, work should be halted until the materials are submitted for laboratory analysis. If mold is identified during replacement activities, it should be abated. As such, Merritt should consider having an environmental professional familiar with the project on site to aid in identifying and sampling potential materials. In most instances, CT DPH does not recommend analytical testing of the air or surfaces to find out how much or what kind of mold is present. As such, Triton's scope of

work has focused on a visual and olfactory evaluation. If requested by the homeowner, such testing can be provided both prior to, and following abatement.

In completing the survey, Triton has relied upon information provided by the client and subcontractors (i.e., testing laboratories). Triton provides no warranty regarding the accuracy and completeness of the information provided by subcontractors. A statistical methodology was used during the materials sampling (consistent with the 5% guidance recommended by EPA). Since not all materials were sampled, Triton cannot guarantee that additional materials are not present which contain higher concentrations. Without additional samples of embedded window materials for PCBs, the need for future EPA involvement cannot be confirmed.

All abatement/renovation activities should be conducted in accordance with all applicable local, state, and federal regulations and Occupational Safety and Health Association (OSHA) guidelines.

This report is intended solely to summarize the results of the ACM, PCB, radon, and XRF lead testing, and mold inspection conducted at the site. This report is not intended to serve as a comprehensive hazardous materials survey or a technical specification for abatement and should not be used as such. All abatement activities should be conducted in accordance with applicable local, state, and federal regulations and OSHA guidelines.

This NEPA Report was prepared specifically for Merritt Construction Services, Inc. and the State of Connecticut. No person or other body shall be entitled to rely upon or use information presented in this report without written consent of Merritt Construction Services, Inc., the State of Connecticut, and Triton Environmental, Inc.

6.0 - SIGNATURES OF REPORT AUTHORS

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.



David Vasiliou, LEP
Senior Project Manager

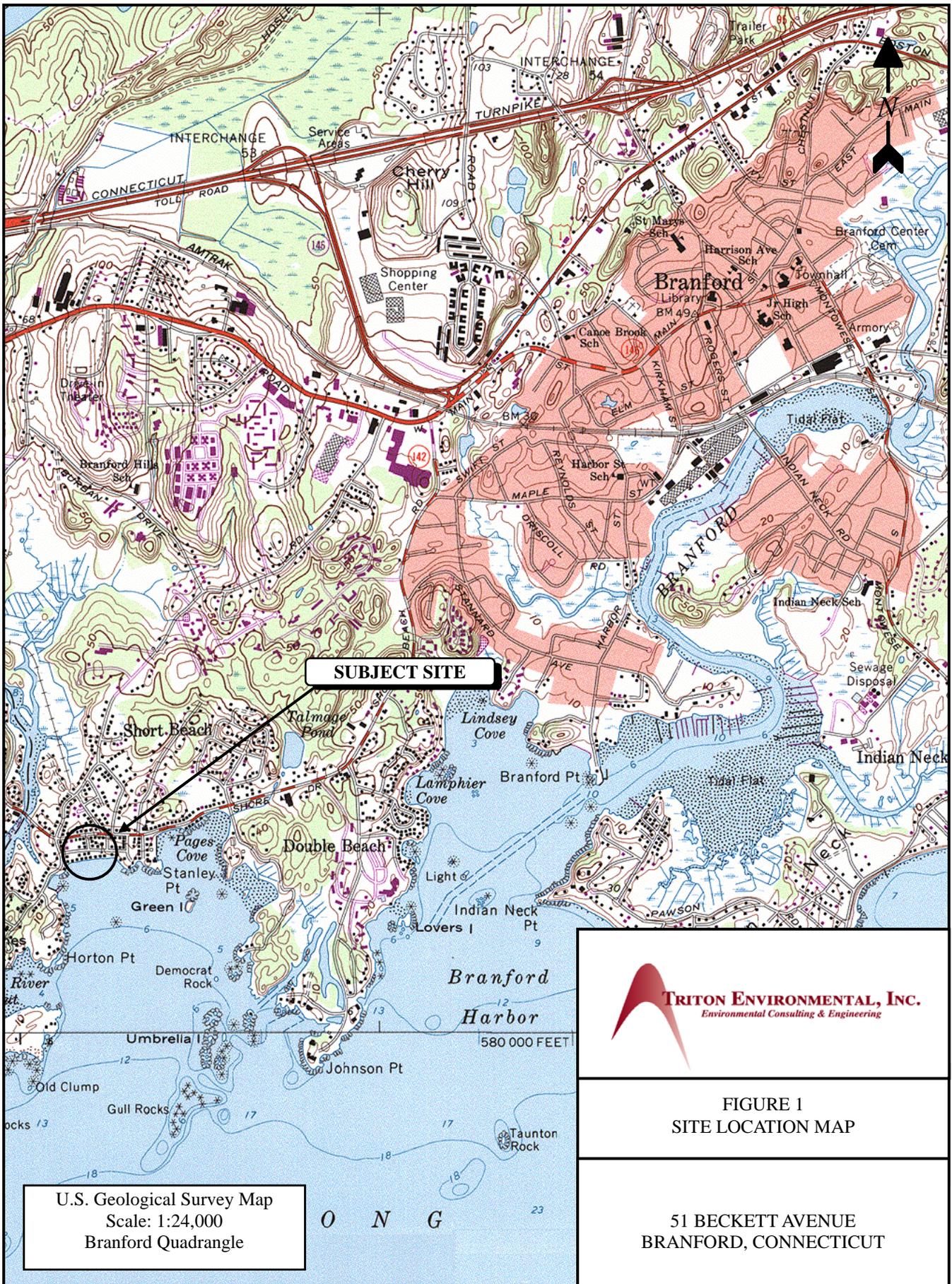


J. Carver Glezen, LEP
Senior Vice President



Christopher E. Marchesi
President

FIGURES



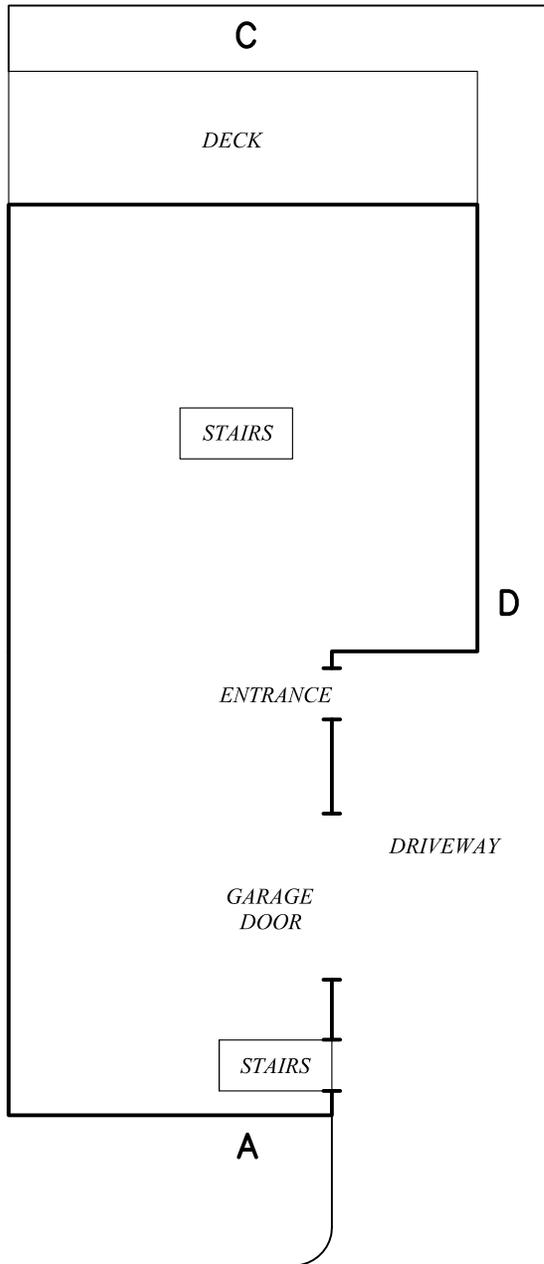
SUBJECT SITE



FIGURE 1
SITE LOCATION MAP

51 BECKETT AVENUE
BRANFORD, CONNECTICUT

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



BECKETT AVENUE

**NOT TO SCALE – SKETCH ONLY
FOR ILLUSTRATIVE PURPOSES**

NOTES:

1. THE LOCATION OF ALL STRUCTURES, EQUIPMENT, DELINEATIONS AND OTHER FEATURES PRESENTED ON THIS DRAWING SHOULD BE CONSIDERED APPROXIMATE. THIS DRAWING SHOULD ONLY BE USED FOR GENERAL PRESENTATION PURPOSES AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES. TRITON MAKES NO WARRANTY AS TO THE CORRECTNESS OR THE COMPLETENESS OF THE INFORMATION CONTAINED IN THIS DRAWING, AND THE USER ASSUMES ALL RISK OF LOSS TO PERSONS AND PROPERTY FROM RELIANCE THEREON.



TRITON ENVIRONMENTAL, INC.
Environmental Consulting & Engineering

385 Church Street, Suite 201 • Guilford, Connecticut 06437 • 203.458.7200

FIGURE 2

SITE DIAGRAM

FIRST FLOOR

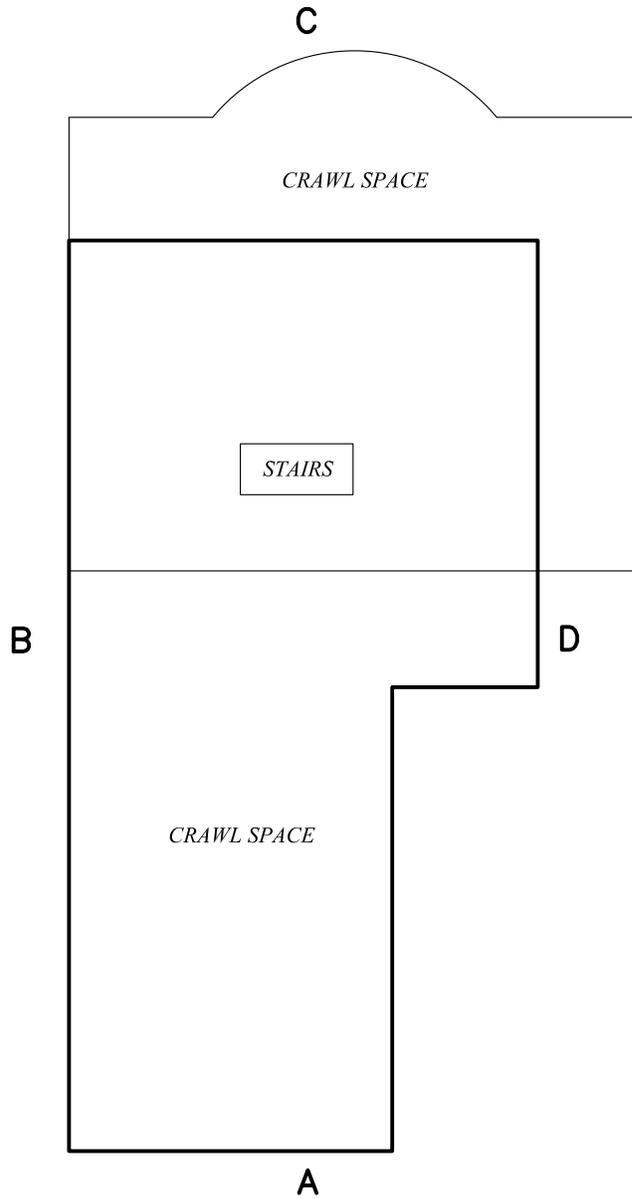
APPLICANT #1034
51 BECKETT AVENUE
BRANFORD, CONNECTICUT

DRAWN BY: FSM

APPROVED BY: BNS

DATE: 1/7/15

SCALE: N.T.S. FILE No.:104318-51BECKETT



**NOT TO SCALE – SKETCH ONLY
FOR ILLUSTRATIVE PURPOSES**

NOTES:

1. THE LOCATION OF ALL STRUCTURES, EQUIPMENT, DELINEATIONS AND OTHER FEATURES PRESENTED ON THIS DRAWING SHOULD BE CONSIDERED APPROXIMATE. THIS DRAWING SHOULD ONLY BE USED FOR GENERAL PRESENTATION PURPOSES AND SHOULD NOT BE USED FOR CONSTRUCTION PURPOSES. TRITON MAKES NO WARRANTY AS TO THE CORRECTNESS OR THE COMPLETENESS OF THE INFORMATION CONTAINED IN THIS DRAWING, AND THE USER ASSUMES ALL RISK OF LOSS TO PERSONS AND PROPERTY FROM RELIANCE THEREON.

 <p>TRITON ENVIRONMENTAL, INC. <i>Environmental Consulting & Engineering</i></p>	
<p>385 Church Street, Suite 201 • Guilford, Connecticut 06437 • 203.458.7200</p>	
<p>FIGURE 2</p>	
<p>SITE DIAGRAM</p>	
<p>BASEMENT</p>	
<p>APPLICANT #1034 51 BECKETT AVENUE BRANFORD, CONNECTICUT</p>	
<p>DRAWN BY: FSM</p>	<p>APPROVED BY: BNS</p>
<p>DATE: 1/7/15</p>	<p>SCALE: N.T.S. FILE No.:104318-51BECKETT</p>

Appendix A
Public Resource Maps



United States Department of the Interior



FISH AND WILDLIFE SERVICE
New England Ecological Services Field Office
70 COMMERCIAL STREET, SUITE 300
CONCORD, NH 3301
PHONE: (603)223-2541 FAX: (603)223-0104
URL: www.fws.gov/newengland

Consultation Code: 05E1NE00-2015-SLI-0193

January 07, 2015

Event Code: 05E1NE00-2015-E-00323

Project Name: #1034 51 Beckett Avenue, Branford, CT

Subject: List of threatened and endangered species that may occur in your proposed project location, and/or may be affected by your proposed project

To Whom It May Concern:

The enclosed species list identifies threatened, endangered, proposed and candidate species, as well as proposed and final designated critical habitat, that may occur within the boundary of your proposed project and/or may be affected by your proposed project. The species list fulfills the requirements of the U.S. Fish and Wildlife Service (Service) under section 7(c) of the Endangered Species Act (Act) of 1973, as amended (16 U.S.C. 1531 *et seq.*).

New information based on updated surveys, changes in the abundance and distribution of species, changed habitat conditions, or other factors could change this list. Please feel free to contact us if you need more current information or assistance regarding the potential impacts to federally proposed, listed, and candidate species and federally designated and proposed critical habitat. Please note that under 50 CFR 402.12(e) of the regulations implementing section 7 of the Act, the accuracy of this species list should be verified after 90 days. This verification can be completed formally or informally as desired. The Service recommends that verification be completed by visiting the ECOS-IPaC website at regular intervals during project planning and implementation for updates to species lists and information. An updated list may be requested through the ECOS-IPaC system by completing the same process used to receive the enclosed list.

The purpose of the Act is to provide a means whereby threatened and endangered species and the ecosystems upon which they depend may be conserved. Under sections 7(a)(1) and 7(a)(2) of the Act and its implementing regulations (50 CFR 402 *et seq.*), Federal agencies are required to utilize their authorities to carry out programs for the conservation of threatened and endangered species and to determine whether projects may affect threatened and endangered species and/or designated critical habitat.

A Biological Assessment is required for construction projects (or other undertakings having similar physical impacts) that are major Federal actions significantly affecting the quality of the human environment as defined in the National Environmental Policy Act (42 U.S.C. 4332(2)(c)). For projects other than major construction activities, the Service suggests that a biological evaluation similar to a Biological Assessment be prepared to determine whether the project may affect listed or proposed species and/or designated or proposed critical habitat. Recommended contents of a Biological Assessment are described at 50 CFR 402.12.

If a Federal agency determines, based on the Biological Assessment or biological evaluation, that listed species and/or designated critical habitat may be affected by the proposed project, the agency is required to consult with the Service pursuant to 50 CFR 402. In addition, the Service recommends that candidate species, proposed species and proposed critical habitat be addressed within the consultation. More information on the regulations and procedures for section 7 consultation, including the role of permit or license applicants, can be found in the "Endangered Species Consultation Handbook" at:

<http://www.fws.gov/endangered/esa-library/pdf/TOC-GLOS.PDF>

Please be aware that bald and golden eagles are protected under the Bald and Golden Eagle Protection Act (16 U.S.C. 668 *et seq.*), and projects affecting these species may require development of an eagle conservation plan (http://www.fws.gov/windenergy/eagle_guidance.html). Additionally, wind energy projects should follow the wind energy guidelines (<http://www.fws.gov/windenergy/>) for minimizing impacts to migratory birds and bats.

Guidance for minimizing impacts to migratory birds for projects including communications towers (e.g., cellular, digital television, radio, and emergency broadcast) can be found at: <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/towers.htm>; <http://www.towerkill.com>; and <http://www.fws.gov/migratorybirds/CurrentBirdIssues/Hazards/towers/comtow.html>.

We appreciate your concern for threatened and endangered species. The Service encourages Federal agencies to include conservation of threatened and endangered species into their project planning to further the purposes of the Act. Please include the Consultation Tracking Number in the header of this letter with any request for consultation or correspondence about your project that you submit to our office.

Attachment



United States Department of Interior
Fish and Wildlife Service

Project name: #1034 51 Beckett Avenue, Branford, CT

Official Species List

Provided by:

New England Ecological Services Field Office
70 COMMERCIAL STREET, SUITE 300
CONCORD, NH 3301
(603) 223-2541
<http://www.fws.gov/newengland>

Consultation Code: 05E1NE00-2015-SLI-0193

Event Code: 05E1NE00-2015-E-00323

Project Type: ** Other **

Project Name: #1034 51 Beckett Avenue, Branford, CT

Project Description: Raising residential dwelling above FEMA flood elevation.

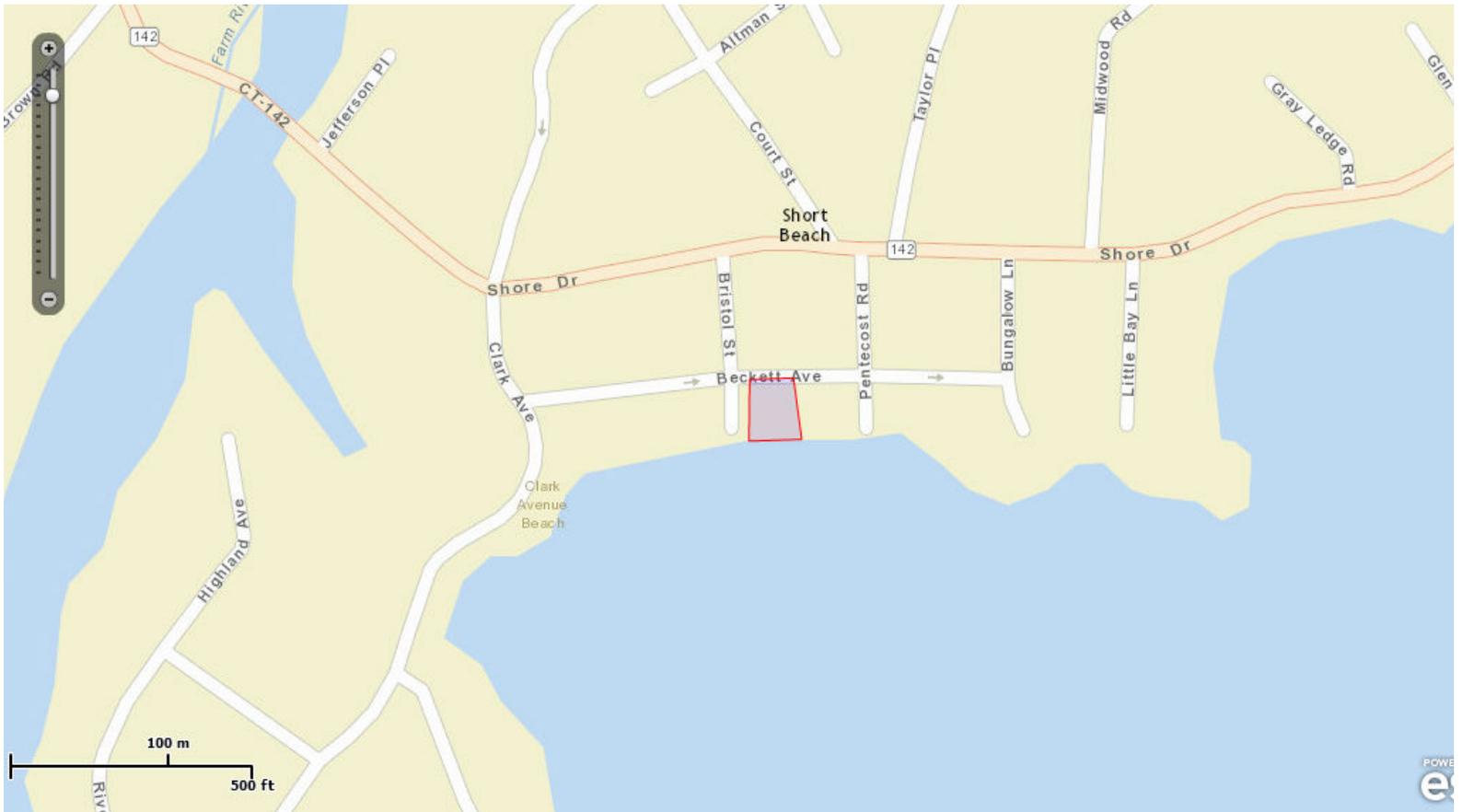
Please Note: The FWS office may have modified the Project Name and/or Project Description, so it may be different from what was submitted in your previous request. If the Consultation Code matches, the FWS considers this to be the same project. Contact the office in the 'Provided by' section of your previous Official Species list if you have any questions or concerns.



United States Department of Interior
Fish and Wildlife Service

Project name: #1034 51 Beckett Avenue, Branford, CT

Project Location Map:



Project Coordinates: MULTIPOLYGON (((-72.8486292 41.2575315, -72.8482939 41.2575397, -72.8482349 41.2571908, -72.8486346 41.2571807, -72.8486292 41.2575315)))

Project Counties: New Haven, CT



United States Department of Interior
Fish and Wildlife Service

Project name: #1034 51 Beckett Avenue, Branford, CT

Endangered Species Act Species List

There are a total of 2 threatened or endangered species on your species list. Species on this list should be considered in an effects analysis for your project and could include species that exist in another geographic area. For example, certain fish may appear on the species list because a project could affect downstream species. Critical habitats listed under the **Has Critical Habitat** column may or may not lie within your project area. See the **Critical habitats within your project area** section further below for critical habitat that lies within your project. Please contact the designated FWS office if you have questions.

Birds	Status	Has Critical Habitat	Condition(s)
Red Knot (<i>Calidris canutus rufa</i>)	Threatened		
Roseate tern (<i>Sterna dougallii dougallii</i>) Population: northeast U.S. nesting pop.	Endangered		



United States Department of Interior
Fish and Wildlife Service

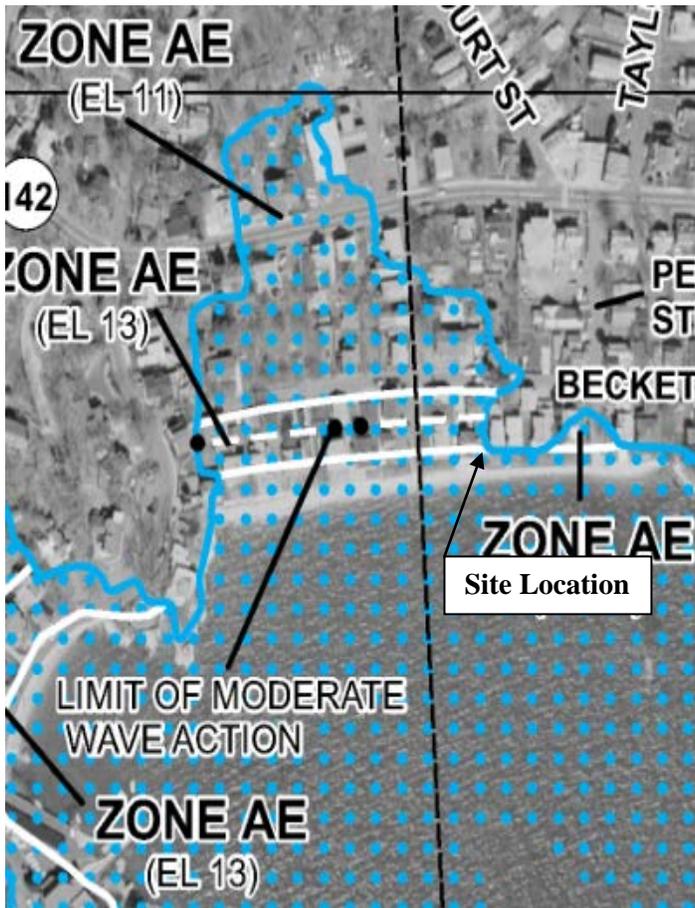
Project name: #1034 51 Beckett Avenue, Branford, CT

Critical habitats that lie within your project area

There are no critical habitats within your project area.

FEMA Flood Insurance Rate Map
(July 2013)

51 Beckett Avenue
Branford, CT



NFIP

NATIONAL FLOOD INSURANCE PROGRAM

PANEL 0463J

FIRM
FLOOD INSURANCE RATE MAP
NEW HAVEN COUNTY,
CONNECTICUT
(ALL JURISDICTIONS)

PANEL 463 OF 635
(SEE MAP INDEX FOR FIRM PANEL LAYOUT)

CONTAINS:

COMMUNITY	NUMBER	PANEL	SUFFIX
BRANFORD, TOWN OF	090073	0463	J
EAST HAVEN, TOWN OF	090076	0463	J

-NOTE-
THIS MAP INCLUDES BOUNDARIES OF THE COASTAL BARRIER RESOURCES SYSTEM ESTABLISHED UNDER THE COASTAL BARRIER RESOURCES ACT OF 1982 AND/OR SUBSEQUENT ENABLING LEGISLATION.

Notice to User: The **Map Number** shown below should be used when placing map orders; the **Community Number** shown above should be used on insurance applications for the subject community.

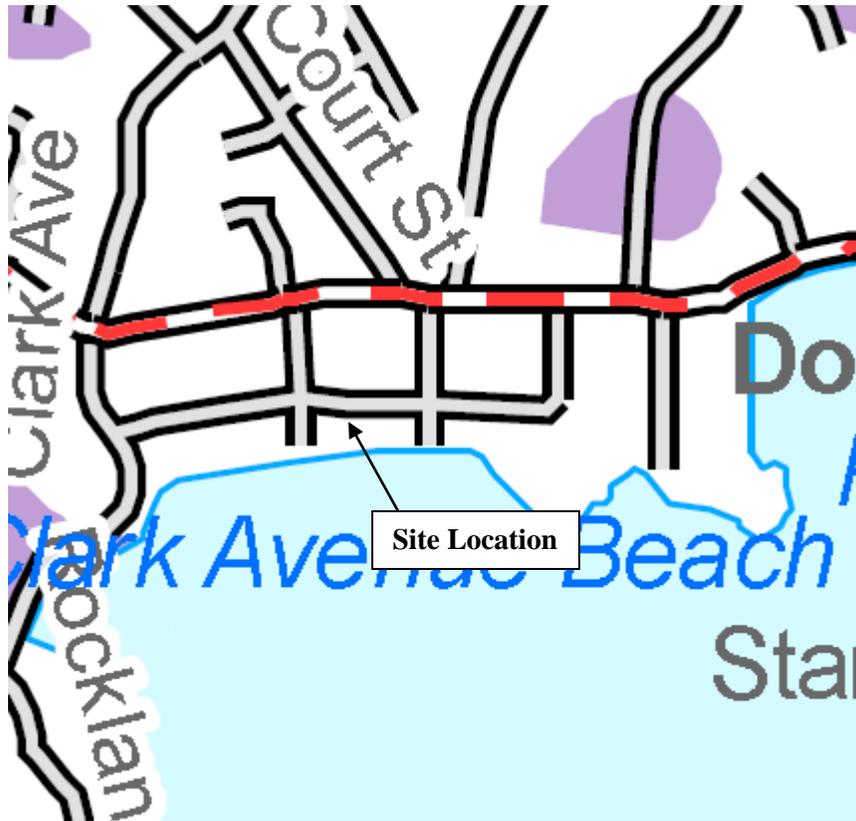
 **MAP NUMBER**
09009C0463J
MAP REVISED
JULY 8, 2013

Federal Emergency Management Agency

**Inland Wetland Soil Map
(October 2009)**

Prepared by CT DEEP

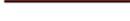
51 Beckett Avenue
Branford, CT



**Inland Wetland Soil Map – Branford
(October 2009)**

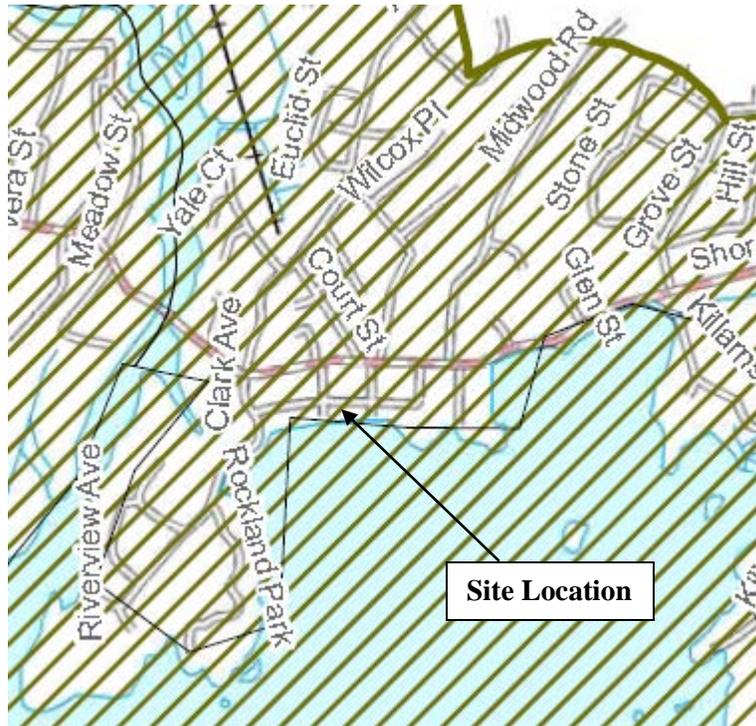
LEGEND

-  **Poorly Drained and Very Poorly Drained soils - Poorly drained soils** occur where the water table is at or just below the ground surface, usually from late fall to early spring. The land where poorly drained soils occur is nearly level or gently sloping. Many of our red maple swamps are on those soils. **Very poorly drained soils** generally occur on level land or in depressions. In these areas, the water table lies at or above the surface during most of the growing season. Most of our marshes and bogs are on these soils.
-  **Alluvial and Floodplain soils** occur along watercourses occupying nearly all level areas subject to periodic flooding. These soils are formed when material is deposited by flowing water. Such material can be composed of clay, silt, sand or gravel. Alluvial and floodplain soils range from excessively drained to very poorly drained.

-  Open Water
-  River, Brook, Stream
-  Town Boundary
-  State Boundary
-  County Boundary
-  Interstate Highway
-  US Route Highway
-  State Route Highway
-  Highway Ramp
-  Local Road
-  Railroad

**Coastal Boundary Map
(January 2013)**

51 Beckett Avenue
Branford, CT



 Coastal Boundary

**Farmland Soil Map
(April 2011)**

51 Beckett Avenue
Branford, CT



Prime Farmland Soils are those soils that have the best combination of physical and chemical characteristics for producing food, feed, forage, fiber, and oil seed crops, and are also available for these uses (the land could be cropland, pastureland, range-land, forestland, or other land, but not urban built-up land or water). It has the soil quality, growing season and moisture supply needed to economically produce sustained high yields or crops when treated and managed, including water management, according to acceptable farming practices.

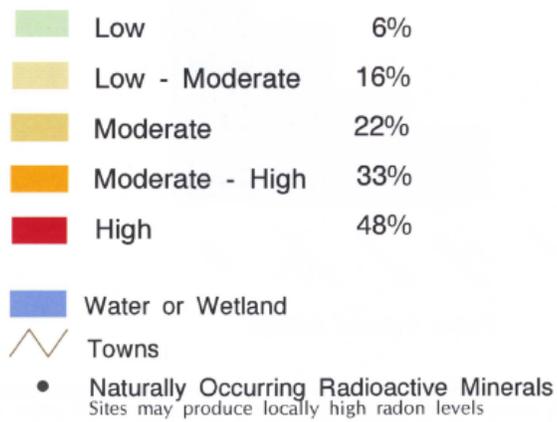
Indoor Radon Potential Map - 1997

51 Beckett Avenue

Branford, CT

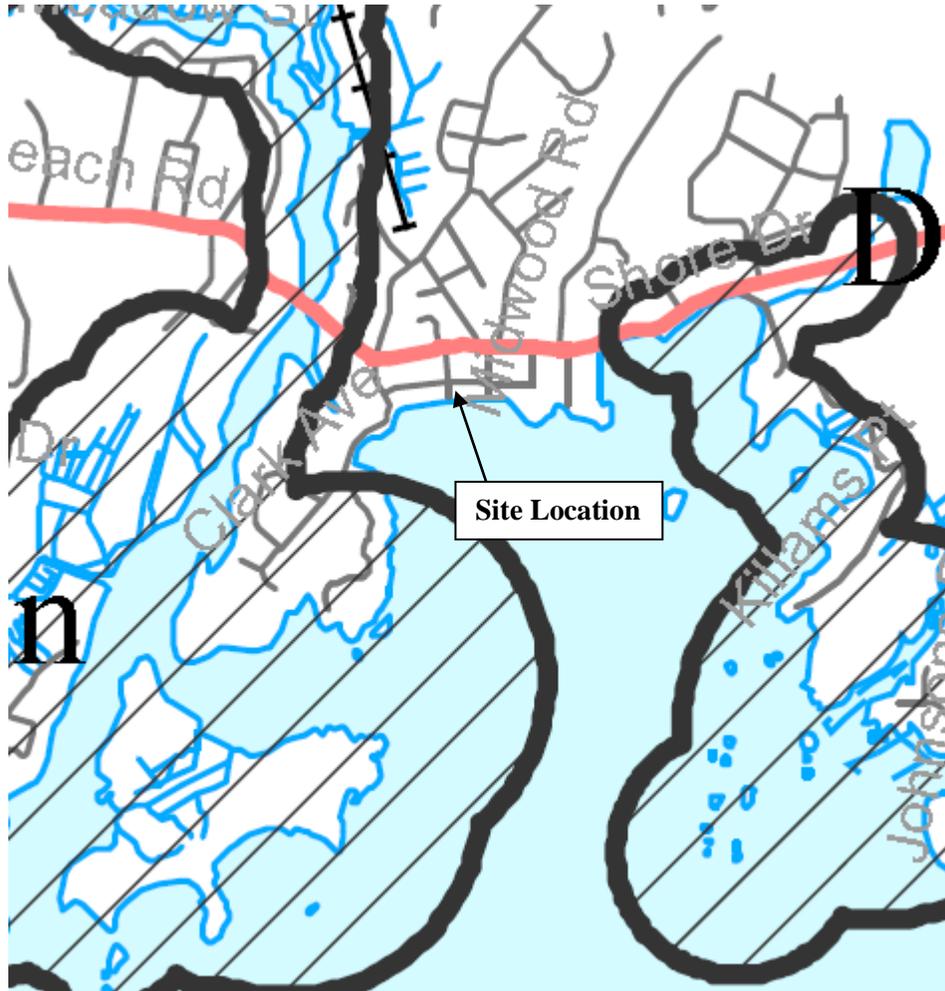


Site location is approximate



Natural Diversity Database Map
(December 2014)

51 Beckett Avenue
Branford, CT



 State and Federal Listed Species
& Significant Natural Communities

**Tidal Wetlands
(1990)**

51 Beckett Avenue
Branford, CT



 Tidal Wetland 1990s

Appendix B
Photographs



Photograph 1
Site building



Photograph 2
Damaged exterior paint



Photograph 3
Basement to be demolished



Photograph 4
Basement to be demolished

Appendix C
XRF Testing Results

Appendix D

Roster of Suspect Asbestos-Containing Materials

Roster of Suspect Asbestos Containing Materials – January 2015
Site # 1034 – 51 Beckett Avenue, Branford, CT

Sample ID	HA	Material	Quantity	Condition	Location
1-3	1	Sheetrock and Joint Compound	500 SF	Good	Basement
4	2	Caulk	8 LF	Good	Basement closet
Notes: SF = Square Feet LF = Linear Feet HA = Homogeneous Area					

Appendix E
Laboratory Analytical Data

**EMSL Analytical, Inc.**

200 Route 130 North, Cinnaminson, NJ 08077

Phone/Fax: (800) 220-3675 / (856) 786-5974

<http://www.EMSL.com>cinnaslab@EMSL.com

EMSL Order:	041437549
CustomerID:	TRIT52
CustomerPO:	104318.33
ProjectID:	

Attn: **Brian Sirowich**
Triton Environmental, Inc.
385 Church Street
Suite 201
Guilford, CT 06437

Phone: (203) 458-7200
 Fax: (203) 458-7201
 Received: 12/22/14 9:00 AM
 Analysis Date: 1/2/2015
 Collected: 12/18/2014

Project: 104318.33

Test Report: Asbestos Analysis of Bulk Materials via EPA 600/R-93/116 Method using Polarized Light Microscopy

Sample	Description	Appearance	Non-Asbestos		Asbestos
			% Fibrous	% Non-Fibrous	% Type
1-Sheetrock 041437549-0001	- Sheetrock & Joint Compound	Brown/White Fibrous Homogeneous	30%	Cellulose	70% Non-fibrous (other) None Detected
			HA: 1		
1-Joint Compound 041437549-0001A	- Sheetrock & Joint Compound	White Non-Fibrous Homogeneous			100% Non-fibrous (other) None Detected
			HA: 1		
2-Sheetrock 041437549-0002	- Sheetrock & Joint Compound	Brown/White Fibrous Homogeneous	30%	Cellulose	70% Non-fibrous (other) None Detected
			HA: 1		
2-Joint Compound 041437549-0002A	- Sheetrock & Joint Compound	White Non-Fibrous Homogeneous			100% Non-fibrous (other) None Detected
			HA: 1		
3-Sheetrock 041437549-0003	- Sheetrock & Joint Compound	Brown/White Fibrous Homogeneous	10%	Cellulose	90% Non-fibrous (other) None Detected
			HA: 1		
3-Joint Compound 041437549-0003A	- Sheetrock & Joint Compound	White Non-Fibrous Homogeneous			100% Non-fibrous (other) None Detected
			HA: 1		
4 041437549-0004	- Caulk	White Non-Fibrous Homogeneous			100% Non-fibrous (other) None Detected
			HA: 2		

Analyst(s)
 Alexis Kum (2)
 Erica Valent (5)

Stephen Siegel, CIH, Laboratory Manager
 or other approved signatory

EMSL maintains liability limited to cost of analysis. This report relates only to the samples reported and may not be reproduced, except in full, without written approval by EMSL. EMSL bears no responsibility for sample collection activities or analytical method limitations. Interpretation and use of test results are the responsibility of the client. This report must not be used by the client to claim product certification, approval, or endorsement by NVLAP, NIST or any agency of the federal government. Non-friable organically bound materials present a problem matrix and therefore EMSL recommends gravimetric reduction prior to analysis. Samples received in good condition unless otherwise noted. Estimated accuracy, precision and uncertainty data available upon request. Unless requested by the client, building materials manufactured with multiple layers (i.e. linoleum, wallboard, etc.) are reported as a single sample. Reporting limit is 1%
 Samples analyzed by EMSL Analytical, Inc. Cinnaminson, NJ NVLAP Lab Code 101048-0, AIHA-LAP, LLC-IHLAP Lab 100194, NYS ELAP 10872, NJ DEP 03036, PA ID# 68-00367

Initial report from 01/02/2015 07:58:07



EMSL ANALYTICAL, INC.
LABORATORY PRODUCTS TRAINING

Asbestos Chain of Custody
EMSL Order Number (Lab Use Only)

041437549

PHONE:
FAX:

Company Name: Triton Environmental, Inc.		EMSL Customer ID:	
Street: 385 Church Street		City: Guilford	State/Province: CT
Zip/Postal Code: 06437	Country: USA	Telephone #: 203-458-7200	Fax #: 203-458-7201
Report To (Name): Brian Sirowich		Please Provide Results: <input type="checkbox"/> Fax <input checked="" type="checkbox"/> Email	
Email Address: bsirowich@tritonenvironmental.com		Purchase Order: 104318.33	
Project Name/Number: 104318.33		EMSL Project ID (Internal Use Only):	
U.S. State Samples Taken: CT		CT Samples: <input type="checkbox"/> Commercial/Taxable <input checked="" type="checkbox"/> Residential/Tax Exempt	

EMSL-Bill to: Same Different - If Bill to is Different note instructions in Comments**
Third Party Billing requires written authorization from third party

Turnaround Time (TAT) Options* - Please Check

- 3 Hour
 6 Hour
 24 Hour
 48 Hour
 72 Hour
 96 Hour
 1 Week
 2 Week

*For TEM Air 3 hr through 6 hr, please call ahead to schedule. *There is a premium charge for 3 Hour TEM AHERA or EPA Level II TAT. You will be asked to sign an authorization form for this service. Analysis completed in accordance with EMSL's Terms and Conditions located in the Analytical Price Guide.

<p>PCM - Air <input type="checkbox"/> Check if samples are from NY</p> <p><input type="checkbox"/> NIOSH 7400 <input type="checkbox"/> w/ OSHA 8hr. TWA</p> <p>PLM - Bulk (reporting limit)</p> <p><input checked="" type="checkbox"/> PLM EPA 600/R-93/116 (<1%) <input type="checkbox"/> PLM EPA NOB (<1%)</p> <p>Point Count</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p>Point Count w/Gravimetric</p> <p><input type="checkbox"/> 400 (<0.25%) <input type="checkbox"/> 1000 (<0.1%)</p> <p><input type="checkbox"/> NYS 198.1 (friable in NY) <input type="checkbox"/> NYS 198.6 NOB (non-friable-NY) <input type="checkbox"/> NYS 198.8 SOF-V <input type="checkbox"/> NIOSH 9002 (<1%)</p>	<p>TEM - Air <input type="checkbox"/> 4-4.5hr TAT (AHERA only)</p> <p><input type="checkbox"/> AHERA 40 CFR, Part 763 <input type="checkbox"/> NIOSH 7402 <input type="checkbox"/> EPA Level II <input type="checkbox"/> ISO 10312</p> <p>TEM - Bulk</p> <p><input type="checkbox"/> TEM EPA NOB <input type="checkbox"/> NYS NOB 198.4 (non-friable-NY) <input type="checkbox"/> Chatfield SOP <input type="checkbox"/> TEM Mass Analysis-EPA 600 sec. 2.5</p> <p>TEM - Water: EPA 100.2</p> <p>Fibers >10µm <input type="checkbox"/> Waste <input type="checkbox"/> Drinking All Fiber Sizes <input type="checkbox"/> Waste <input type="checkbox"/> Drinking</p>	<p>TEM - Dust</p> <p><input type="checkbox"/> Microvac - ASTM D 5755 <input type="checkbox"/> Wipe - ASTM D6480 <input type="checkbox"/> Carpet Sonication (EPA 600/J-93/167)</p> <p>Soil/Rock/Vermiculite*</p> <p><input type="checkbox"/> PLM CARB 435 - A (0.25% sensitivity) <input type="checkbox"/> PLM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - B (0.1% sensitivity) <input type="checkbox"/> TEM CARB 435 - C (0.01% sensitivity) <input type="checkbox"/> TEM Qual. via Filtration Technique <input type="checkbox"/> TEM Qual. via Drop-Mount Technique</p> <p><small>*Can not accept New York State Loose Fill Vermiculite Samples</small></p> <p>Other: <input type="checkbox"/></p>
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Check For Positive Stop - Clearly Identify Homogenous Group Filter Pore Size (Air Samples): 0.8µm 0.45µm

Samplers Name: Brian Sirowich/Craig Smolin **Samplers Signature:** *[Signature]*

Sample #	Sample Description	Volume/Area (Air) HA # (Bulk)	Date/Time Sampled
1-3	Sheetrock and joint compound	HA-1	12/18/14 1500
4	Caulk	HA-2	12/18/14 1500

Client Sample # (s): 1, 2, 3, 4 **Total # of Samples:** 4

Relinquished (Client): *[Signature]* **Date:** 12/19/14 **Time:** 1030

Received (Lab): *[Signature]* EMSL FX **Date:** 12-22-2014 **Time:** 9:00 AM

Comments/Special Instructions:

4

80 Lupes Drive
Stratford, CT 06615



Tel: (203) 377-9984
Fax: (203) 377-9952
e-mail: cet1@cetlabs.com

Client: Mr. Brian Sirowich
Triton Environmental
385 Church St.
Guilford, CT 06437

Analytical Report

CET# 4120482

Report Date: December 23, 2014
Project: 104318-51 Beckett St, Branford
Project Number: 104318

Connecticut Laboratory Certificate: PH 0116
Massachusetts laboratory Certificate.: M-CT903



New York Certification: 11982
Rhode Island Certification: 199

CET #:4120482

Project: 104318-51 Beckett St, Branford

Project Number: 104318

SAMPLE SUMMARY

The sample(s) were received at 17.5°C.

This report contains analytical data associated with following samples only.

Sample ID	Laboratory ID	Matrix	Collection Date/Time	Receipt Date
PCB-1	4120482-01	Caulk	12/18/2014 14:30	12/18/2014

Client Sample ID PCB-1

Lab ID: 4120482-01

PCBs by Soxhlet

Method: EPA 8082A

Analyst: SJ

Matrix: Caulk

Analyte	Result (mg/kg (As Rec))	RL (mg/kg (As Rec))	Dilution	Prep Method	Batch	Prepared	Date/Time Analyzed	Notes
PCB-1016	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
PCB-1221	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
PCB-1232	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
PCB-1242	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
PCB-1248	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
PCB-1254	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
PCB-1260	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
PCB-1268	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
PCB-1262	ND	0.80	4	EPA 3540C	B4L1936	12/19/2014	12/23/2014 07:28	
<i>Surrogate: TCMX</i>	<i>63.5 %</i>	<i>50 - 150</i>			B4L1936	12/19/2014	<i>12/23/2014 07:28</i>	
<i>Surrogate: DCB</i>	<i>67.5 %</i>	<i>50 - 150</i>			B4L1936	12/19/2014	<i>12/23/2014 07:28</i>	

CET #:4120482

Project: 104318-51 Beckett St, Branford

Project Number: 104318

QUALITY CONTROL SECTION

Batch B4L1936 - EPA 8082A

Analyte	Result (mg/kg (As Rec))	RL (mg/kg (As Rec))	Spike Level	Source Result	% Rec	% Rec Limits	RPD	RPD Limit	Notes
Blank (B4L1936-BLK1)					Prepared: 12/19/2014 Analyzed: 12/23/2014				
PCB-1016	ND	0.20							
PCB-1221	ND	0.20							
PCB-1232	ND	0.20							
PCB-1242	ND	0.20							
PCB-1248	ND	0.20							
PCB-1254	ND	0.20							
PCB-1260	ND	0.20							
PCB-1268	ND	0.20							
PCB-1262	ND	0.20							
<i>Surrogate: TCMX</i>					75.3	50 - 150			
<i>Surrogate: DCB</i>					79.6	50 - 150			
LCS (B4L1936-BS1)					Prepared: 12/19/2014 Analyzed: 12/23/2014				
PCB-1016	0.851	0.20	1.000		85.1	50 - 150			
PCB-1260	0.999	0.20	1.000		99.9	50 - 150			
<i>Surrogate: TCMX</i>					76.6	50 - 150			
<i>Surrogate: DCB</i>					85.8	50 - 150			

CET #:4120482

Project: 104318-51 Beckett St, Branford

Project Number: 104318

Batch S4L2308 - EPA 8082A

Analyte	Result (ug/L)	RL (ug/L)	Spike Level	Source Result	% Rec	% Rec Limits	RPD	RPD Limit	Notes
Calibration Check (S4L2308-CCV1)					Prepared: 12/23/2014 Analyzed: 12/23/2014				
PCB-1016	1080		1,000.000		108	80 - 120			
PCB-1260	1190		1,000.000		119	80 - 120			
<i>Surrogate: TCMX</i>					<i>110</i>	<i>50 - 150</i>			
<i>Surrogate: DCB</i>					<i>106</i>	<i>50 - 150</i>			



80 Lupes Drive
Stratford, CT 06615

Tel: (203) 377-9984
Fax: (203) 377-9952
email: cet1@cetlabs.com

Quality Control Definitions and Abbreviations

Internal Standard (IS)	An Analyte added to each sample or sample extract. An internal standard is used to monitor retention time, calculate relative response, and quantify analytes of interest.
Surrogate Recovery	The % recovery for non-tarer organic compounds that are spiked into all samples. Used to determine method performance.
Continuing Calibration Batch	An analytical standard analyzed with each set of samples to verify initial calibration of the system. Samples that are analyzed together with the same method, sequence and lot of reagents within the same time period.
ND	Not detected
RL	Reporting Limit
Dilution	Multiplier added to detection levels (MDL) and/or sample results due to interferences and/or high concentration of target compounds.
Duplicate Result	Result from the duplicate analysis of a sample. Amount of analyte found in a sample.
Spike Level	Amount of analyte added to a sample
Matrix Spike Result	Amount of analyte found including amount that was spiked.
Matrix Spike Dup	Amount of analyte foun in duplicate spikes including amount that was spike.
Matrix Spike % Recovery	% Recovery of spiked amount in sample.
Matrix Spike Dup % Recovery	% Recovery of spiked duplicate amount in sample.
RPD	Relative percent difference between Matrix Spike and Matrix Spike Duplicate.
Blank	Method Blank that has been taken through all steps of the analysis.
LCS % Recovery	Laboratory Control Sample percent recovery. The amount of analyte recovered from a fortified sample.
Recovery Limits	A range within which specified measurements results must fall to be compliant.
CC	Calibration Verification

Flags:

- H- Recovery is above the control limits
- L- Recovery is below the control limits
- B- Compound detected in the Blank
- P- RPD of dual column results exceeds 40%
- #- Sample result too high for accurate spike recovery.



Connecticut Laboratory Certification PH0116
Massachussets Laboratory Certification M-CT903

New York Certification 11982
Rhode Island Certification 199

CET #:4120482

Project: 104318-51 Beckett St, Branford

Project Number: 104318

Questions related to this report should be directed to David Ditta, Timothy Fusco, or Robert Blake at 203-377-9984.

Sincerely,



David Ditta
Laboratory Director

Report Comments:

Sample Result Flags:

- E- The result is estimated, above the calibration range.
- H- The surrogate recovery is above the control limits.
- L- The surrogate recovery is below the control limits.
- B- The compound was detected in the laboratory blank.
- P- The Relative Percent Difference (RPD) of dual column analyses exceeds 40%.
- D- The RPD between the sample and the sample duplicate is high. Sample Homogeneity may be a problem.
- + - The Surrogate was diluted out.
- *C1- The Continuing Calibration did not meet method specifications and was biased low for this analyte. Increased uncertainty is associated with the reported value which is likely to be biased low.
- *C2- The Continuing Calibration did not meet method specifications and was biased high for this analyte. Increased uncertainty is associated with the reported value which is likely to be biased high.
- *F1- The Laboratory Control Sample recovery is outside of control limits. Reported value for this analyte is likely to be biased on the low side.
- *F2- The Laboratory Control Sample recovery is outside of control limits. Reported value for this analyte is likely to be biased on the high side.
- I- The Analyte exceeds %RSD limits for the Initial Calibration. This is a non-directional bias.

All results met standard operating procedures unless indicated by a data qualifier next to a sample result, or a narration in the QC report.

Complete Environmental Testing is only responsible for the certified testing and is not directly responsible for the integrity of the sample before laboratory receipt.

ND is None Detected at the specified detection limit

All analyses were performed in house unless a Reference Laboratory is listed.

Samples will be disposed of 30 days after the report date.

