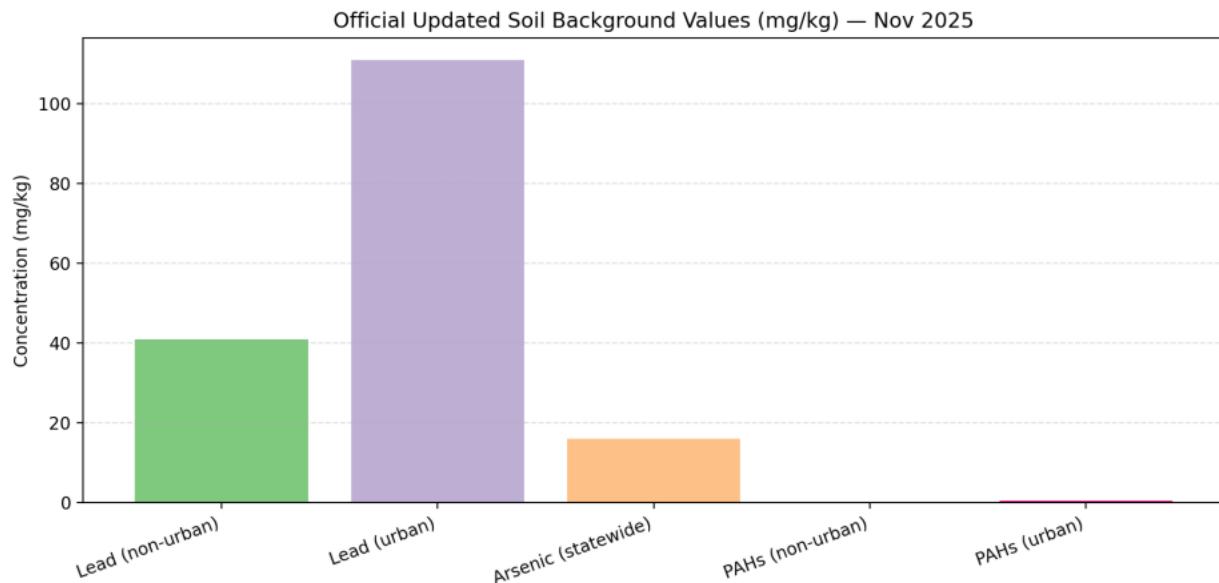


Vermont Soil Standards Update (Nov 2025) & Regulatory Timeline

1) Official Updated Soil Background Values (mg/kg) — November 2025

Contaminant/Context	Updated Value (mg/kg)
Lead — Non-urban	41
Lead — Urban	111
Arsenic — Statewide	16
PAHs — Non-urban	0.076
PAHs — Urban	0.58



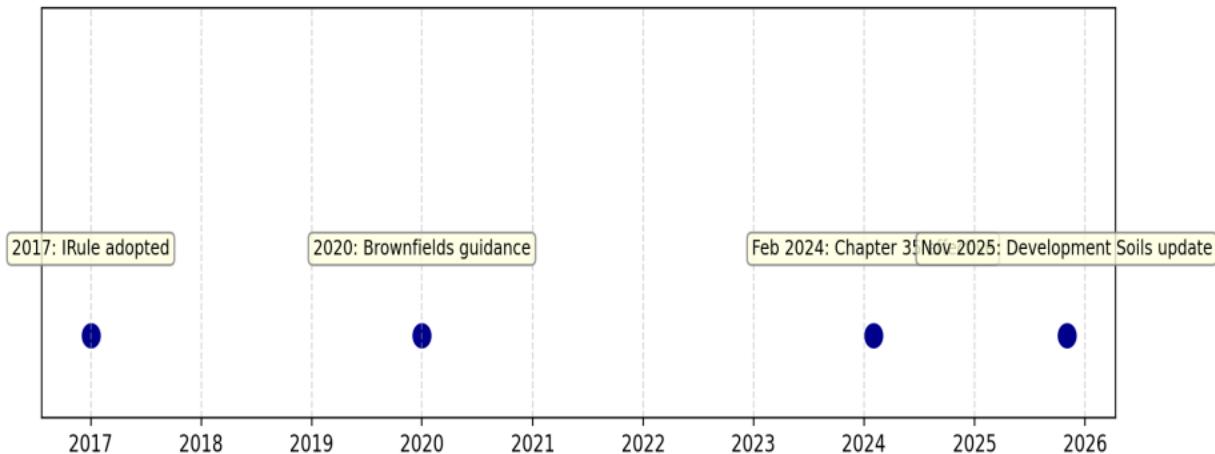
2) Reference Sheet

Citation: Vermont Department of Environmental Conservation (DEC), "Development Soils Factsheet — Updated November 2025." Available from DEC Waste Management & Prevention Division (Sites Management Section).

What triggers reporting & management under the IRule?

- **Threshold exceedance:** If soil analytical results exceed the updated background values listed above for lead, arsenic, or PAHs, the condition must be **reported to DEC**.
- **Redevelopment/soil disturbance:** When excavation or movement of soils occurs, the property owner/developer must submit a **site characterization plan**, perform **soil testing**, and implement **risk-based management** measures.
- **Management measures:** DEC may require **capping or containment, corrective action plans, long-term monitoring, and institutional controls** (e.g., environmental easements) under the Investigation and Remediation of Contaminated Properties Rule (IRule; Environmental Protection Rules Chapter 35, effective Feb 2024).
- **Undisturbed existing properties:** No retroactive cleanup is required solely due to updated values, but any future disturbance or redevelopment will trigger the obligations above.

3) Timeline of Key Vermont Soil Regulatory Changes



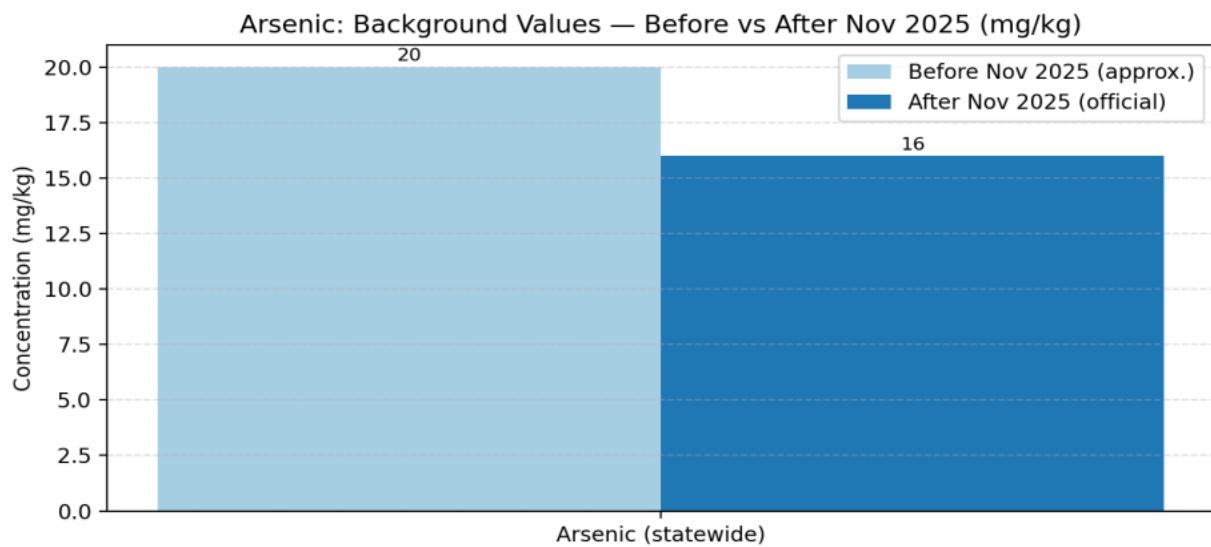
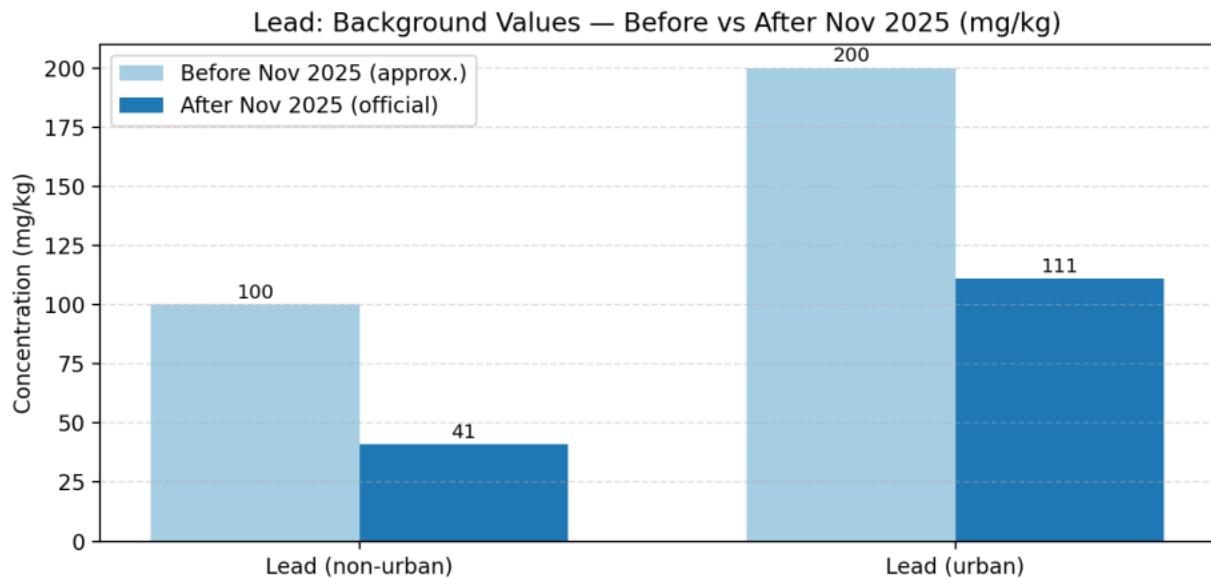
2017: Initial adoption of the Investigation & Remediation of Contaminated Properties Rule (IRule).

2020: Brownfields program expansion guidance issued.

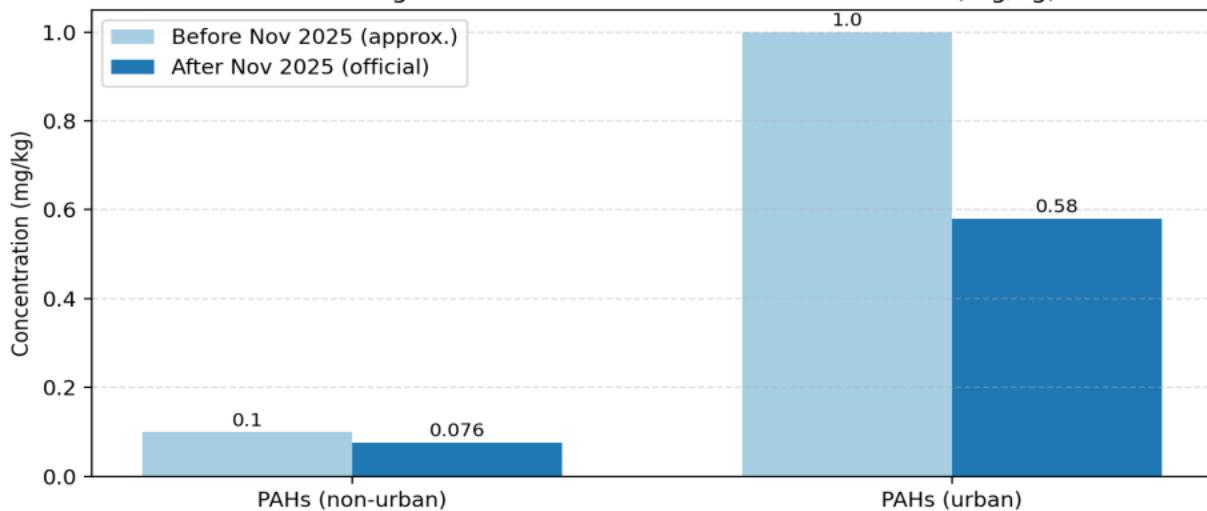
Feb 2024: Environmental Protection Rules Chapter 35 effective (investigation, corrective action, monitoring, public notice, environmental easements).

Nov 2025: DEC publishes updated Development Soils guidance and background values for lead, arsenic, PAHs.

4) Contaminant Specific Comparisons (Before vs After Nov 2025)



PAHs: Background Values — Before vs After Nov 2025 (mg/kg)



: DEC p