

State of Vermont Department of Environmental Conservation Waste Management & Prevention Division 1 National Life Drive – Davis 1 Montpelier, VT 05620-3704

October 18, 2018

AGENCY OF NATURAL RESOURCES

Mr. Francisco Trejo Unicorn Management Consultants, LLC 52 Federal Road, Suite 2C Danbury, CT 06810

*Re:* Interim Evaluation of Corrective Action Alternatives (ECAA) – June 25, 2018 General Cable Site, Pownal, VT SMS# 87-0129

Dear Mr. Ghioureliotis,

The SMS has reviewed the ECCA submitted on June 25, 2018 for the General Cable Site, SMS 87-0129 prepared and signed by Unicorn Management Consultants, Michael Ghioureliotis and Michael O'Connor. The SMS has determined that additional analyses of the alternatives reviewed as part of the report is necessary.

This request is based on the public comment received regarding the above document that was held from June 27 -September 13, 2018. The Vermont Department of Environmental Conservation (VT DEC) also received email correspondence from the Fire District 2 Board on September 27, 2018 indicating that their members had voted in favor (8-3) of construction of a new uncontaminated water supply versus the recommended alternative which was maintaining the current carbon treatment system. In addition, the VT DEC received verbal correspondence from the District Board that they were presently negotiating property access to the former Green Mountain Race Track property (identified in the *Water Supply Well Targeting Report-February 28, 2017* by Otter Creek Engineering but not studied as part of the ECAA due to the inability to obtain an access agreement) to assess the aquifer for the District's water supply needs. In lieu of the lack of District member support for the ECAA, the VT DEC will not approve the proposed alternative of carbon treatment on the existing contaminated supply well. The VT DEC requests that further investigation and evaluation of the former Green Mountain Race Track property be conducted upon receipt of a property access agreement between the property owner and Fire District #2.

Please provide a workplan to conduct the additional analyses of the Green Mountain Race Track to the VTDEC within 30 days. This Workplan should be in compliance with the VTDEC 2010 Water Supply Rule and meet all the objectives of the Environmental Corrective Action Alternatives in the 2017 Investigation and Remediation of Contaminated Properties Rule.

Should you have any questions regarding this correspondence, I may be reached at 802-249-5770.

Sincerely,

Patricia Coppolino, Environmental Program Manager Sites Management Section

Cc: Tim Raymond, DWGWPD (electronically) Dorothy Baker, FD2, Chair (electronically) Michael Ghioureliotis, UMC (electronically) Michael O'Connor, UMC (electronicaly)

