

**State of Vermont**  
**Department of Environmental Conservation**  
**Waste Management and Prevention Division**  
**One National Life Drive – Davis 1**  
**Montpelier, VT 05620-3704**  
**(802) 828-1138 (Main Switchboard)**  
**chuck.schwer@state.vt.us**

November 13, 2013

William and Loretta Brownell  
818 White Creek Road  
Brownell's Auto Wrecking  
No. Bennington, VT 05357

RE: Site Management Activity Completed for Brownell's Auto, North Bennington, VT / SMS Site#20002838

Dear Mr. & Mrs. Brownell:

The Vermont Agency of Natural Resources (ANR), Sites Management Section (SMS) has received Paul Miller's, "Site Investigation Report", dated July 24, 2013 requesting a Sites Management Activity Completed (SMAC) for Brownell's Auto Wrecking located in North Bennington, VT. The SMS has reviewed this letter and historical property information and concludes the following:

- Brownell's Auto Wrecking has operated as a salvage yard on 818 White Creek Road in North Bennington for 50 years. The main property use is for salvaging of junk cars. Currently, the property consists of approximately 1.6 acres of land with three buildings (residence, office and garage). The property is served by a private bedrock well estimated at 220 feet deep.
- On February 4, 2000, the ANR issued a Notice of Alleged Violation 'NOAV' letter, following a site inspection, requesting the hiring of an environmental consultant to determine the degree and extent of contamination observed onsite and an assessment of potential impacts to human health and the environment.
- In 2000-2001, a site investigation was completed by Environmental Compliance Services, Inc. (ECS). Samples were collected from three monitoring wells and two supply wells (onsite well and adjacent shallow well) for the presence of volatile organic compounds (VOCs). Sampling showed the shallow Cook well impacted with MTBE above the drinking water health advisory level. It was reported that the Cook well was not used for drinking but as 'gray water' only. The Cook residence shared the onsite bedrock well for drinking needs. In addition, approximately 50 cubic yards of impacted soils located east of the garage were excavated and stockpiled onsite north of the garage. Soil sampling was collected for laboratory analysis by EPA Method 8021B and 8015 DRO. Results indicated the presence of petroleum compounds however at concentrations below current soil screening values for residential soil. This pile has been presumed to have been thin spread onsite.
- In late November 2009, the ANR returned to the property to evaluate the site for releases of hazardous materials and hazardous waste management practices. Based on the findings, the ANR issued a NOAV to the Brownell's on December 2, 2009, which outlined a number of alleged violations of state statutes, regulations and permits. One of the action items was the hiring of an environmental consultant to submit a work plan to address the petroleum contamination observed on the property.
- Since 2009, Paul Miller / Consulting Hydrogeologist has been retained by the Brownell's to address the immediate response actions and follow up site investigation. Approximately 7cys of oil



contaminated soils were excavated from the area of the former car crusher and stockpiled in an area to the west of the former car crusher. Groundwater samples were collected from the existing three monitoring wells, onsite supply well and former Cook well. In addition, surface water samples were collected from the stream ditch that borders the north side of the property. Samples were analyzed for VOCs and analytical results revealed non detect.

- On November 16<sup>th</sup>, 2011, an Assurance of Discontinuance (AOD) was signed and filed with the Superior Court, Environmental Division to comply with ANR directives including additional site investigation work requested by the WMD. This additional environmental sampling was carried out and summarized in the 'Site Investigation Report' submitted by Paul Miller on July 23, 2013. Requested work included the resampling of the monitoring wells and soil stockpile for RCRA 8 metals, and sediments from depositional area of the onsite unnamed tributary for RCRA 8 metals and total iron. Results of this sampling revealed no exceedances of groundwater standards and the soil and sediment results are within screening values.
- The shallow supply well that once served the former Cook residence has been closed and no longer exists. The mobile home has been removed. On September 10, 2013, Paul Miller abandoned the three onsite monitoring wells in accordance with the ANR Water Supply Rule, Chapter 21, Section 12.3.5.
- At this time, no unacceptable risk to human health and the environment appears to be present from the historical release.

The SMS requests that you continue to coordinate the operation of your salvage yard with the DEC Salvage Yard Program, and the standard monitoring requirements of the Multi Sector General Permit with the Stormwater Management Program.

Based on the above, the SMS is assigning the Brownell Auto a 'Site Management Activity Completed' designation. This SMAC designation does not release the current of any past or future liability associated with any residual contamination that may remain onsite. It does, however, mean that the SMS is not requesting any additional work in response to the historical petroleum release.

Please feel free to call either myself or Linda Elliott at 802-249-5479 if you have any questions.

Sincerely,



Chuck Schwer, Section Chief  
Sites Management Section

c: via email

DEC Regional Office  
John Zaikowski, DEC Environmental Enforcement Attorney  
Shawn Donovan, DEC Salvage Yard Program  
Jenna Calvi-DEC Stormwater Management Program  
Shaftsbury Town Office  
Paul Miller

Y:\site.files\2000.2838.Brownell.Salvage\2013\1002.13.schwer.brownell.smac.let