

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
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hugo.martinez.cazon@state.vt.us

December 27, 2013

Mr. Thomas Lyons
Cornell Main Street, LP
131 Battery Street
Burlington, VT

Re: 131 Battery Street property, Burlington
SMS# 2001-2892

Dear Mr. Lyons:

Thank you for the December 23, 2013 Testing Scope letter, submitted on your behalf by Waite Environmental and received here December 24, 2013. The work is approved for implementation.

The Vermont Department of Environmental Conservation's (VTDEC) indicated objectives of the continuation of the site investigation include: a better determination of whether there is a path of chlorinated solvent groundwater contaminant migration to the Southwest from the onsite sample point, MW-8, toward the Union Station Building property, and to include additional groundwater, soil, and soil vapor sampling points.

The site investigation indicates that the TCE (trichloroethene) dissolved groundwater plume has been laterally characterized as affecting off property adjacent parcels across Lake St, towards Lake Champlain in a generally Southwest direction from the source area at your property.

The proposed Testing Scope includes quarterly groundwater sampling, as well as the collection of the natural attenuation parameters, to determine whether favorable conditions exists for remediation of the released TCE via Monitored Natural Attenuation. A second round of soil vapor sampling is proposed, to address recent laboratory difficulties, so as to know if there is any potential for indoor air intrusion.

The VTDEC wishes to state, that the next effort will be an evaluation of possible source area control measures, including potential mitigation actions. These will be presented in a Corrective Action Plan (CAP) or if you wish in a Corrective Action Feasibility Investigation (CAFI). As this response is carried out as the voluntary action of the responsible party, you may choose the corrective action you wish to implement. The VTDEC will accept a measure that appropriately halts the offsite migration of chlorinated solvents. That includes the option for demonstrable Monitored Natural Attenuation.



A reasonable schedule to receive the CAFI or CAP, following the February 2014 sampling will be during the first week of May 2014. At that time VTDEC should receive a Monitoring Report accompanied by the CAFI/CAP.

Please prepare a Notice to Land Record for the affected adjacent parking lot area, as excavation and dewatering of those areas pose a potential for environmental release and human risk. The Notice should be recorded within 30 days of the date of this letter to you. The format is the same as the Notice entered for your property 3/19/2008.

I am at your disposal, should you have any questions, at 522-5564, or via email at: hugo.martinez.cazon@state.vt.us

Sincerely,



Hugo Martínez Cazón, PE
Environmental Analyst

Cc: Miles Waite
Nick Warner
Melinda Moulton

Waite & Heindel, LLC
Burlington CEDO
Main Street Landing