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Department of Environmental Conservation
Waste Management Division
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June 23, 2010

JOHN BERINO
FAHC ENVIRONMENTAL HEALTH AND SAFETY
111 COLCHESTER AVENUE
BURLINGTON, VERMONT 05401

RE: Sites Management Activity Complete, Fletcher Allen Medical Center,
SMS Site #2002-2973, Burlington, Vermont

Dear Mr. Berino:

The Sites Management Section (SMS) has reviewed the October 14, 2003 report prepared by KD Associates titled *"Site Investigation Report, for Petroleum Contamination at the Engineering Building / Boiler Room, of Fletcher Allen Health Care (FAHC)"*. The SMS also reviewed information contained in the site file and, with respect to the release associated with the removal of two 20,000 gallon fuel oil underground storage tanks (USTs) in January 2002 makes the Sites Management Activity Complete (SMAC) determination described further below:

- During the January 15, 2002 removal of two 20,000 gallon fuel oil underground storage tanks (UST) contaminated soil was observed. Volatile organic compounds (VOCs) were measured by a photoionization detector (PID). PID readings of the soils at the USTs ranged up to 37.5 parts per million (ppm). The tanks were located on a concrete pad and backfilled with sand. Hardpan soil was observed in one test pit north of the slab and PID readings decreased with depth. Based on the new age of the tanks and lack of contamination in the sand backfill, it was surmised that the contamination was residual from the previous USTs, replaced in 1991 with the current USTs. Groundwater was not encountered. All contaminated soils were backfilled. At that time no additional investigation was recommended due to the fact that extensive excavation and construction was planned for the area.
- During foundation and elevator shaft excavation in summer 2002 additional petroleum contaminated soil and petroleum sheens on groundwater were discovered. Approximately 1140 tons of petroleum contaminated soil was excavated and disposed of at the ESMI facility in Loudon, NH. Oily groundwater was pumped from the elevator shaft using a vacuum truck and disposed of by Environmental Products & Services. Additional site investigation was required by the SMS.
- During the week of May 26, 2003 fourteen 55-gallon drums of petroleum contaminated soil were hand excavated from the footing on the east side of the boiler room. The soil was field screened for volatile organic compounds (VOCs) using a photoionization detector. A



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maximum of 49 parts per million (ppm) was observed. Indoor air samples were screened in the adjacent rooms following the soil removal and no elevated VOC readings were noted.

- On June 17, 2003 three soil borings were advanced in the basement through the concrete floor near the elevator shaft where petroleum contaminated water had been previously observed. No water was found in the soil borings. Soil samples recovered from the borings as well as the bore holes themselves were screened by PID and no elevated VOC readings were noted.
- No additional investigation was required by the SMS, however the site was not closed and FAHC was requested to retain KD Associates for environmental consulting services until the building renovation project was completed.
- The site and surroundings are on municipal water. The indoor air of the engineering and boiler rooms was screened using a PID and no elevated VOC levels were noted. It was also reported that during the April 2002 foundation piling drilling that no stained soil, petroleum odors, elevated PID readings, or groundwater were observed.
- In response to a May 2010 project status inquiry Bryan Schultz, KD Associates, confirmed that no additional soil or groundwater contamination were observed during the time following the June 2003 soil investigation until the 2005 Renaissance Project completion¹.

Based on the above, the SMS is assigning this site a Site Management Activity Completed designation. This SMAC designation does not release Fletcher Allen Health Care of any past or future liability associated with the petroleum contamination onsite. It does, however, mean that the SMS is not requesting any additional work in response to the 2002 UST removals or contaminated soil removals performed during site construction.

Please feel free to call with any questions.

Sincerely,



Chuck Schwer
Program Manager, Sites Management Section

CC: Burlington Selectboard
Burlington Health Officer
DEC Regional Office (via electronic mail)
Bryan Schultz, KD Associates (via electronic mail)

¹ May 14, 2010 letter from Bryan Schultz, KD Associates to Gerold Noyes, SMS.