

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
103 South Main Street/West Building
Waterbury, VT 05671-0404
(802) 241-3888
FAX (802) 241-3296
chuck.schwer@state.vt.us

November 7, 2012

ATTN WANDA WAUGH
WWWAUGH LLC
46 CHERRY ST
ST JOHNSBURY VT 05819

RE: Sites Management Activities Completed, Canterbury Inn, St. Johnsbury (SMS Site #20063498)

Dear Ms. Waugh:

The Sites Management Section (SMS) has recently conducted a review of the above referenced site file. Information contained within our site file includes the following:

- On January 11, 2006, one 4,000 gallon heating oil Underground Storage Tank (UST) was removed from the Canterbury Inn property after heating oil had been observed flowing into the boiler room through a conduit that housed the suction and return lines the previous day. At the time of removal, the tank was noted to be in fair condition but the suction and return lines were found to be broken near the top of the UST. During excavation, a photoionization detector (PID) was utilized to screen soils for the presence of petroleum volatile organic compounds (VOCs); readings peaked at 470 parts per million (ppm) under the PVC conduit and at the southeastern portion of the building foundation. Although all accessible impacted soil was removed and soil samples indicated there were no detectable VOCs at the extent of the excavation, fuel odor persisted in basement indoor air. Especially during rain events.
- A soil vapor survey was performed by Ross Environmental Associates and vapor levels up to 2,000ppm were found below the basement floor. A soil vapor extraction (SVE) system was installed to mitigate the fuel oil beneath the basement floor. Vapor concentrations in the SVE system improved significantly over the next number of months but occasional fuel vapors in basement air remained a concern.
- In 2008, WWVaugh, LLC purchased the property from the previous owner and retained Leggette, Brashears and Graham, Inc. to continue environmental consulting work. Additional vapor points were installed and any potential openings of the basement to sub-slab soil were sealed to continue sub-slab fuel impacted soil mitigation and prevent indoor air impacts.
- In 2010, an SVE rebound test was performed after SVE concentrations had declined to less than 5ppm. The SVE system was shut down for 15 days in advance of the test and after the blower had been run for more than four hours, the concentrations in Vapor Point 1R returned to levels similar to those existing when the system was shut down. Although low level contamination remains below the basement floor, it appears that the floor sealing has been effective at preventing intrusion into the basement. However, because some sub-



slab elevated concentrations do remain, a low to no maintenance passive vapor vent was installed to allow any low level accumulated vapors to discharge directly to the exterior of the building above the roofline.

Based on the above, it appears that this site does not pose an unacceptable risk to human health or the environment. Therefore, the SMS is assigning the site a Sites Management Activities Completed (SMAC) designation. The SMAC designation does not release WWVaugh, LLC from any past or future liability associated with the #2 fuel oil contamination at this site. It does, however, mean the SMS is not requesting any additional work in response to the UST release at this time.

Should you have any questions, please do not hesitate to call me; I may be reached at (802) 241-3876.

Sincerely,



Chuck Schwer
Chief, Sites Management Section

CC: Deirdra Ritzer - Leggette, Brashears & Graham, Inc. - (submitted electronically)
Steve Rebillard - DEC St. Johnsbury Regional Office - (submitted electronically)
St. Johnsbury Select Board
St. Johnsbury Health Officer