

State of Vermont
Department of Environmental Conservation
Waste Management Division
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June 18, 2010

JOHN TEDESCO
SAFETY & ENVIRONMENTAL MANAGER
GREEN MOUNTAIN POWER
163 ACORN LANE
COLCHESTER, VERMONT 05446

RE: Sites Management Activity Complete, Green Mountain Power Garage
(former Westminster Realty), SMS Site #2006-3518, Westminster, Vermont

Dear Mr. Tedesco:

I am writing concerning the property referred to as the former Farnsworth Construction site, which was a gravel pit and construction equipment maintenance facility. It was purchased by Westminster Realty and later subdivided. The 7.7 acre parcel containing the Farnsworth building was developed by Green Mountain Power as a utility truck dispatch facility.

The other 13 acre parcel remains undeveloped. This parcel was investigated by Harper Environmental Associates for the State of Vermont Buildings and General Services Department. No contamination was found on the 13 acre parcel and it was not made a site following Sites Management Section (SMS) review of the Harper report.

The SMS reviewed the report '*Green Mountain Power Corporation, Fall 2009 Groundwater Monitoring Report, 1038 Westminster Heights Road, Westminster, Vermont*' submitted by Environmental Compliance Services (ECS) for sampling that occurred on October 14, 2009. The SMS also reviewed information contained in the site file. With respect to the soil and groundwater contamination reported in the Environmental Compliance Services (ECS) Phase I (11/2005) and Phase II (4/2006) Environmental Site Investigations makes the Sites Management Activity Complete (SMAC) determination described further below:

- As a result of the ECS reports Heindel & Noyes (H&N) was hired to perform the following work. In June 2006 an oil-water separator was removed, the septic system sampled, 6 groundwater monitor wells installed, and 4 test pits were excavated to investigate areas of solid waste disposal. Contaminated soil was observed surrounding the separator and was excavated and stockpiled on site. Groundwater and seep samples indicated the presence of elevated levels (above background) of cadmium, chromium, and lead above Vermont Groundwater Enforcement Standards (VGES). Elevated barium levels were also noted, however these were below the VGES. Volatile organic



Over

compounds, semi-volatile organic compounds, and total petroleum hydrocarbons were not detected in the groundwater samples.

- The SMS required additional work, which was conducted by H&N in October 2006. Groundwater monitor wells MW-1, -2R -5, and -6 were sampled for RCRA metals. Lead (22 µg/L and 33 µg/L) was found in MW-2R and -6 above the VGES. Chromium (127 µg/L) was found in MW-6 above the VGES. Arsenic, barium, and cadmium below the VGES were also noted. Seep-1 and -2 both contained arsenic, barium, chromium, and lead below the VGES. Previously lead and chromium had been detected above the VGES. MW-5 up-gradient of the site building, leach field, and oil-water separator, also contained detectable levels of arsenic, barium, chromium, and lead generally at levels below those observed down gradient of these features and below the VGES. The oil-water separator, piping, and 260 tons of contaminated soil and debris were removed for off-site disposal at ESMI in Loudon, New Hampshire. The site septic tanks were sampled, pumped out, and their contents properly disposed of. No evidence of improper waste disposal to the septic system was found.
- Long term groundwater monitoring for metals was required by the SMS. On May 14, 2008 the site monitor wells were sampled by Bell Engineering. 2 or more of arsenic, cadmium, chromium, and lead were found above the VGES in MW-1, -2R, -5, Seep-1, Seep-2, MW-stream-1, and MW-stream-2.
- In October 2009 ECS installed 3 replacement monitor wells (ECS-1, -2, and -3) and sampled MW-1 and MW-2R. All other monitor wells and sample locations had been destroyed. The October 14, 2009 results showed groundwater contamination above the VGES in MW-1 (17 and 41 µg/L) and -2R (19 and 15 µg/L) for arsenic and lead, respectively. The ECS wells had no contamination above the VGES. Previous investigations at other groundwater and surface water sample locations on site have shown maximum levels of arsenic (250 µg/L), cadmium (21 µg/L), chromium (300 µg/L), and lead (173 µg/L). Some of this variation may be due to the fact that 3 different environmental consultants have sampled the site and installed monitoring wells.
- The site water supply well and Morse Brook were identified as sensitive receptors. No other at-risk sensitive receptors were identified. Morse Brook, was sampled up-gradient, at, and down-gradient of the site for metals contamination and no detectable contamination was found by H&N. Bell Engineering samples did, however, find metals contamination above the VGES in Morse Brook. No contamination was found in a water sample from the supply well.
- Based on these previous investigations, sample results, and property use history as a construction equipment maintenance facility the SMS did not accept the ECS conclusion that these metals levels were naturally occurring. A Notice to Land Records was required as a condition of site closure. A Notice to Land Records was recorded on May 27, 2010 (Volume #170 and Page #76) at the Westminster Town Clerk Offices regarding the residual contamination on-site in the groundwater.
- The site monitor wells were closed by removing the well heads, filling the wells with cement, and finishing to the surrounding grade.

Based on the above, the SMS is assigning this site a Site Management Activity Completed designation. This SMAC designation does not release Green Mountain Power of any past or future liability associated with the soil and groundwater contamination onsite. It does, however, mean that the SMS is not

requesting any additional work in response to the contamination reported in the 2006 Phase II Environmental Site Assessment of the former Farnsworth Construction Garage.

Please feel free to call with any questions.

Sincerely,



Chuck Schwer
Program Manager, Sites Management Section

CC: Westminster Selectboard
Westminster Health Officer
E. Joseph Aja, Jr., VT BGS (via electronic mail)
Linda Matteson, DEC Regional Office (via electronic mail)
John Ponsetto, Gravel & Shea (via electronic mail)
Laura Woodard, Environmental Compliance Services (via electronic mail)
Steve LaRosa, Heindel & Noyes (via electronic mail)