

State of Vermont

*AGENCY OF NATURAL RESOURCES*  
**Department of Environmental Conservation**  
**Waste Management Division**  
**103 South Main Street/West Building**  
**Waterbury, VT 05671-0404**  
**(802) 241-3731**  
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October 10, 2007

Mr. Vincent Blaisdell  
State of Vermont Dept. of Buildings and General Services  
2 Governor Aiken Avenue  
Montpelier, VT 05633-5801

**RE: UST Closure**  
**Site: Woodside Juvenile Rehabilitation Center, Essex, VT (SMS Site #2007-3692)**

#### FIRST LETTER

Dear Mr. Blaisdell,

The Sites Management Section (SMS) has received the Underground Storage Tank (UST) Closure Report for the above referenced property. Subsurface contamination was encountered during the recent fieldwork at this site, which was conducted by Ross Environmental Associates (REA). The following UST was removed from the property:

- UST #001, a 12,000-gallon heating oil UST

The tank was noted to be in fair condition upon removal. Free-phase product was encountered beneath the tank, which is believed to have originated from a hole in the tank wall. Approximately 150 gallons of product was removed from the tank excavation. Groundwater was not encountered in the tank grave. A replacement UST was recently installed in the former tank location. Soils were removed from the excavation to accommodate the new tank. Soils screened for petroleum vapors using a photoionization detector (PID) had maximum readings of 942 parts per million (ppm). The full extent of contamination was not determined. Approximately 57 tons of petroleum contaminated soil was temporarily stockpiled onsite and later transported to ESMI in Loudon, NH for disposal. Potential receptors in this area include soils, groundwater and surface water.

Based on the report information, the SMS concurs with the recommendations of REA for additional investigation at this property. Due to the risk to nearby receptors, the SMS requests that you have an environmental consultant perform the following:

- **Further define the degree and extent of contamination to the soil.**
- **If appropriate, determine if the airspace beneath the site and adjacent building(s) (e.g. basements) has been impacted by the release using a PID.** Wall and floor construction and susceptibility to vapor migration should be noted. PID measurements should be made in cracks and/or joints likely impacted. If the airspace has been impacted, SMS requests confirmatory sampling and laboratory analyses be performed using EPA Method TO-2.
- **Determine the degree and extent of contamination, if any, to groundwater.** A sufficient number

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of monitoring sites should be installed to adequately define the severity of site contamination. Analyze groundwater samples for VOCs using EPA Method 8260 and Total Petroleum Hydrocarbons (TPH) using EPA Method 8015 (DRO). At sites proximal to water supply sources, determine the hydrologic relationship of the contaminated area to the water supply source. Pumping influences should be considered in the evaluation.

- **Assess the potential for contaminant impact on sensitive receptors.** Base this update on all available information and include basements of adjacent buildings, nearby surface water, any proximal drinking water sources, wetlands, sensitive ecologic areas, outdoor or indoor air, sewers, or utility corridors. Sample and analyze any onsite water supply wells and any other at-risk water supplies for VOCs using EPA Method 524.2.
- **Determine the need for long-term treatment and/or monitoring that addresses groundwater contamination.**
- **Submit documentation for the soil disposal at ESML.**
- **Submit a summary report that outlines the work performed, as well as provides conclusions and recommendations.** *As appropriate* include analytical data; a site map showing the location of any potential sensitive receptors, stockpiled soils and monitoring or sample locations; an area map; detailed well logs; and a groundwater contour map.

Please have your consultant submit a preliminary work plan and cost estimate within *fifteen days* of your receipt of this letter, so it may be approved prior to the initiation of onsite work.

As a property of the State of Vermont, the underground storage tank at the Woodside Juvenile Rehabilitation Center will be eligible for participation in the Petroleum Cleanup Fund (PCF). The Department of Buildings and General Services must pay for the removal and/or repair of the failed tank(s), and for the initial \$10,000.00 of the cleanup. The fund will reimburse the tank owner or permittee for additional eligible cleanup costs of up to \$1 million. All expenditures must be pre-approved by the Agency or performed in accordance with the "Site Investigation Procedure" expressway program.

Please feel free to call me with any questions you may have. I can be reached at (802) 241-3731.

Sincerely,



Ashley Desmond, Environmental Analyst  
Sites Management Section

c: Jeff Simone, REA (sent via e-mail)  
DEC Regional Office – Essex Junction (sent via e-mail)  
Essex Selectboard  
Essex Health Officer