

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
FAX (802) 241-3296

February 19, 2008

A.I.R. Campground, LLC
c/o Uniprop, Marie Hamling
15235 South Tiamiami Trail
Fort Myers, FL 33908-4298

RE: UST Closure

Site: Apple Island Resort, 71 US Route 2, South Hero, VT (SMS Site #2008-3762)

Dear Ms. Hamling,

The Sites Management Section (SMS) has received the Underground Storage Tank (UST) Investigation Report for the above referenced property, which was submitted by Environmental Products & Services of VT (EPS VT) and dated January 2, 2008. Subsurface contamination was encountered at this site in relation to one of the three former tanks. The following USTs were removed from the property:

- UST #001, a 4,000-gallon gasoline UST
- UST #002, a 4,000-gallon gasoline UST
- UST #003, a 6,000-gallon gasoline UST

All three tanks were said to be in excellent condition when removed. No contamination was encountered in relation to UST #001 or UST #002. During the removal of UST #003, visual and olfactory evidence of a petroleum release was present. It is suspected that contamination originated from a leak in the tank piping. Soils screened for petroleum vapors using a photoionization detector (PID) had a peak reading of 885 parts per million (ppm). Groundwater was encountered at a depth of 6.5 feet below grade in the excavation. The limits of contamination were not defined.

A brief survey of sensitive receptors was conducted at the property. Groundwater, soils, surface water and nearby water supply wells were identified as potential receptors. Lake Champlain is located directly across Route 2 from the property. EPS VT was not able to identify the location of the onsite water supply well during their survey.

Based on the report information, the SMS concurs with the recommendations of EPS VT 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 of monitoring sites should be installed to adequately define the severity of site contamination. Analyze groundwater samples for Volatile Organic Compounds (VOCs) using EPA Method 8260, Total Petroleum
OVER→



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 BTEX, TPH, and MTBE compounds.
- **Determine the need for long-term treatment and/or monitoring that addresses groundwater contamination.**
- **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.

Based on current information, the UST investigation work at your property is eligible for participation in the Petroleum Cleanup Fund (PCF). You must provide written proof that you hold no other applicable insurance in order to receive reimbursement from the PCF. Documentation required must include a complete copy of the applicable property or liability policy that was in place on the date the contamination was discovered; and a pollution coverage statement from the insurance carrier. The statement must include name and address of the insurer, the name of the policyholder, policy number(s) and dates of coverage. Also necessary, the name and telephone number of the claims analyst or contact person, and if coverage is denied, then a statement referencing specific policy language invoked to deny coverage of the claim.

The owner or permittee 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 refer to the enclosed guidance document titled, "Procedures for Reimbursement from the Petroleum Cleanup Fund" for additional information concerning the PCF.

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

Enc: (2)

c: Kate Connelly, EPS VT (sent via e-mail)
DEC Regional Office – Essex Junction (submitted via e-mail)
South Hero Selectboard
South Hero Health Officer