VERMONT

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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July 10, 2008

Mr. Andy Shively
AOT Operations Division
1 National Life Drive, Drawer 33
Montpelier, VT 05602

RE: Petroleum Contamination
Site: VTrans Garage, Middlebury, VT (SMS Site #2008-3798)

Dear Mr. Shively,

The Sites Management Section (SMS) has received the Underground Storage Tank (UST) Removal and Site Assessment Report for the above referenced property, which was submitted by Lincoln Applied Geology (LAG) and dated May 29, 2008. Subsurface contamination was encountered during the assessment work. The following UST was removed from the property:

- UST #001, an 8,000-gallon diesel UST

During the removal process, the fuel line for the UST was damaged, and product was released into the excavation. A vacuum truck and sorbents were utilized to remove product from the underlying soils and groundwater. The UST and associated piping was found to be in good structural condition when removed. Aside from the spill from the fuel line, it appeared that contamination was also focused around the fill pipe. Groundwater was encountered in the excavation at a depth of approximately 3.5 feet, and was noted to have a sheen. Soils screened for petroleum vapors using a photoionization detector (PID) had a peak reading of 39.2 parts per million (ppm). The limits of contamination were not defined.

A brief survey of sensitive receptors was conducted at the property. Groundwater and soils were identified as potential receptors. Otter Creek is located approximately 500 feet from the former tank, and is unlikely to be impacted. Properties in this area are served by the municipal drinking water system.

Based on the report information, the SMS concurs with the recommendations of LAG 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.

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- **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 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 costs associated with investigation/remediation at this property will be eligible for participation in the Petroleum Cleanup Fund (PCF) after payment of a $10,000 deductible. The fund will reimburse Agency of Transportation (AOT) for additional eligible cleanup costs of up to $1 million. All expenditures must be pre-approved by the Agency.

I will be the SMS contact for this site. 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: Dagan Murray, LAG (sent via e-mail)
DEC Regional Office – Essex Junction (submitted via e-mail)
Middlebury Selectboard
Middlebury Health Officer