

**State of Vermont**  
**Department of Environmental Conservation**  
**Waste Management Division**  
**103 South Main Street/West Building**  
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October 16, 2008

Ms. Ruth Rivers  
Northwest Counseling & Support Services  
107 Fisher Pond Road  
St. Albans, VT 05478

RE: Petroleum Contamination, Project Soar School, St. Albans (SMS Site #2008-3843)

Dear Ms. Rivers:

The Sites Management Section (SMS) has received the Underground Storage Tank Closure Assessment Report for the above referenced property. The report details subsurface contamination that was encountered during the recent fieldwork at this site, which was conducted by KAS Consulting, Inc. (KAS) on August 13, 2008. The following UST was removed from the property:

- UST #1 – 12,000 gallon steel fuel oil UST

The UST was reported to be in excellent condition, with no evidence of rusting or pitting. However, a faulty suction pipe connection was observed during the course of tank removal, and visual and olfactory evidence of petroleum contamination was noted. Groundwater was encountered at approximately 6 ft below ground surface (bgs), with a maximum excavation depth of approximately 11 ft bgs. Soils screened for volatile organic compounds (VOCs) using a photoionization detector (PID) exhibited contaminant concentrations ranging from 7.0 to 254 parts per million (ppm). Soils in the excavation pit consisted primarily of sandy fill and native silty clay.

A brief survey of sensitive receptors was conducted at the property. Potential receptors include groundwater, soils, and nearby water supply wells.

Based on the information presented in the UST Closure Assessment Report, the SMS has determined that additional information regarding the Project Soar School property is necessary. Due to the risk to nearby receptors, the SMS requests that you retain the services of a qualified environmental consultant to 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) has been impacted by the release.** Wall and floor construction and susceptibility to vapor migration should be noted. A PID should be utilized to assess the VOC concentrations in cracks and/or joints likely to be impacted. If it is determined that the airspace has been impacted, the SMS requests confirmatory sampling and laboratory analysis to be performed using EPA Method TO-2.
- **Determine the degree and extent, if any, of contamination to the groundwater.** A sufficient number of monitoring sites should be installed to adequately define the severity of site contamination. Groundwater samples should be analyzed for VOCs using EPA Method 8021B and for 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 this evaluation.

- **Assess the potential for contaminant impacts on sensitive receptors.** Base this on all available information and include basements to adjacent buildings, nearby surface waters, any proximal drinking water supply sources, wetlands, sensitive ecologic areas, outdoor and indoor air, sewers, and other utility corridors. Sample and analyze any on-site 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 addressed 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 depicting the location of any potential sensitive receptors, stockpiled soils, and monitoring and/or sampling 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 receipt of this letter, so that it may be approved prior to the initiation of on-site work. The estimated total costs for the additional work may be eligible for reimbursement through the Petroleum Cleanup Fund (PCF). Please note that the reimbursement of the costs associated with this work is subject to:

- Receipt of complete copies of the applicable property or liability policies for the site at the time the contamination was discovered. Each applicable policy must include the declaration page, with the policy number and period.
- A statement concerning pollution coverage from your insurance carrier(s). The statement must include:
  - The name and address of the insurer, including the name and telephone number of the claims analyst or other person handling the claim for the insurer.
  - The name of the policy holder, the policy number(s), and the dates of coverage.
  - If coverage is denied, 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 costs. The fund will reimburse the tank owner or permittee for additional eligible cleanup costs up to \$1 million. All expenditures must be pre-approved by the Agency of Natural Resources or performed in accordance with the *Site Investigation Procedures Expressway Program*. Please refer to the document titled *Procedures for Reimbursement from the Petroleum Cleanup Fund* (located online at <http://www.anr.state.vt.us/dec/wastediv/sms/smsgdint.htm>) for additional information concerning the PCF.

Please do not hesitate to contact me should you have any questions. I may be reached by telephone at (802) 241-3489, or via email at [sarah.a.bartlett@state.vt.us](mailto:sarah.a.bartlett@state.vt.us).

Sincerely,



Sarah Palmer Bartlett  
Environmental Analyst  
Sites Management Section

CC: Alan Liptak – KAS (submitted electronically)  
DEC Regional Office – Essex Junction (submitted electronically)  
St. Albans City Select Board  
St. Albans City Health Officer