

State of Vermont
Department of Environmental Conservation
Waste Management Division
103 South Main Street/West Building
Waterbury, VT 05671-0404
(802) 241-3967
FAX (802) 241-3296
patricia.coppolino@state.vt.us

MEMORANDUM

FROM: Patricia Coppolino, VTDEC Site Manager
TO: Dan Voisin, Stone Environmental
CC: Dan Potter, SWCRPC
Tom Kennedy, SWCRPC
SUBJECT: Comments on Phase II for Edgar May Health and Recreation Center

Figures:

Figure 2 – Please update location of BR11

Figure 2 – Please locate SB24,25,26 on the map

Report:

Page 7, Section 2.2.4, First paragraph, last sentence; I'm not sure that soils with PCBs greater than 1 part per million can be disposed of as alternative daily cover;

Page 7, please identify where the locations are from table 1A on Figure 4? I cannot locate GW-1C;

Page 9, 2.3.4, First paragraph states that GW7 was analyzed for PAHs, Table 3 indicates NS for PAH parameters. Were PAHs analyzed at GW-7? Figure 5 also indicates that PAHs weren't sampled for GW-7;

Page 9, 2.4.2, Sentence starting "Exterior locations.....to approximately 30 ft bgs." Were the soil gas points really 30 feet deep?

Table 4 – why don't the concentrations for Xylene (m,p) and Xylene (o) equal the Xylene (total) concentrations?

Page 11 – 2.5.3, last sentence, reporting of Copper results, the BR11 sample has a relatively low copper result compared to its duplicate, any thought to why the large variance occurred?

Page 15, Section 2.6.6, second sentence, "Of the six wipe samples.....of 11 µg/100cm²....). The compliance value is 10 µg /100cm²;

Page 19, 3.2, last paragraph, last sentence. Although the concentrations of PCBs outside of the foundry building are low, they are still present and may indicate that they have been carried outside of the building by foot traffic;

Page 20, section 4, 5th paragraph, I think it is a stretch to say that it is difficult to assign responsibility of the impacted sediments to the site, especially when the highest concentrations were in the "middle" of the sampling locations. Although I do agree that the methods of dealing with the impacted sediments are warranted along with preventing stormwater discharges from the site;



Next Steps:

Resample PCB at SB-5, SB-19? Composite samples indicate a possible exceedance?

Resample MWs for PAHs

Close the foundry building and post notices about PCB contamination within building in accordance with TSCA regulations

Put Notice to land records on property related to building and site groundwater

Resample metal cuttings on river bank for PCBs

I did not review any of the costs for corrective action that were included in the document.

If you have any questions or comments, please feel free to contact me by phone at (802) 241-3967, by email at patricia.coppolino@state.vt.us, or in writing at the above address.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Patricia Coppolino', with a horizontal line extending to the left.

Patricia Coppolino, Site Manager
Sites Management Section
Brownfields Response Program