

State of Vermont
Department of Environmental Conservation
Waste Management Division
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August 27, 2009

Mr. Vince Blaisdell
State of Vermont
Department of Buildings & General Services
2 Governor Aiken Avenue
Montpelier, VT 05633

RE: Petroleum Contamination, Vermont Police Academy, Pittsford (SMS Site #2009-3960)

Dear Mr. Blaisdell:

The Sites Management Section (SMS) has received the Underground Storage Tank (UST) Closure Report for the above referenced property. The report details subsurface contamination that was encountered during recent fieldwork at this site, which was conducted by Ross Environmental Associates, Inc. (REA) on July 7, 2009. The following UST was removed from the property:

- UST #1 – 8,000 gallon fuel oil UST

The UST was noted to be in poor condition at the time of removal, with rusting, pitting, and several holes apparent on the tank exterior. Additionally, it was noted that the tank had been previously closed in-place, and was full of sand. Black staining and odors consistent with a petroleum release was observed in the excavation pit. Groundwater was not encountered at a maximum excavation depth of approximately 12 ft below ground surface (bgs). Soils screened for volatile organic compounds (VOCs) using a photoionization detector (PID) exhibited contaminant concentrations ranging from 1.0 to 236 parts per million (ppm). Soils within the excavation consisted of medium and fine grained light brown sands. At the time of the UST removal, approximately 30 yds³ of petroleum contaminated soils were temporarily stockpiled on the property; these soils were transported, on August 5, 2009, to the Waste USA Landfill in Coventry, VT for use as daily cover.

A brief survey of sensitive receptors was conducted at the property. Potential receptors include groundwater, soils, surface water, two nearby Class II Significant Wetlands, and indoor air. Three soil samples were collected from the UST excavation pit and submitted for laboratory analysis of petroleum VOCs via EPA Method 8260, and for Total Petroleum Hydrocarbons (TPH) via EPA Method 8015 DRO. All three samples contained TPH in excess of the State action level for both residential and industrial properties, and all three samples contained detectable quantities of one or more petroleum related VOCs; two of the samples contained petroleum VOCs in excess of the EPA Risk Screening Levels (RSLs).

Based on the information contained in the UST Closure Report, the SMS has determined that additional information regarding the Vermont Police Academy 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) via EPA Method 8015. 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 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 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 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 the following:

- Complete copies of the applicable property or liability policies for this site at the time the contamination was discovered. Each applicable policy must include the declarations 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 the following address: <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.

Sincerely,



Sarah Palmer Bartlett
Environmental Analyst
Sites Management Section

CC: Megan McConville – REA (submitted electronically)
DEC Regional Office – Rutland (submitted electronically)
Pittsford Town Select Board
Pittsford Town Health Officer