

State of Vermont

AGENCY OF NATURAL RESOURCES  
Department of Environmental Conservation  
Waste Management Division  
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August 31, 2009

Bill Tronsen  
Bennington College  
One College Drive  
Bennington, VT 05201

**RE: Petroleum Contamination**

**Site: Orchard Houses C and E, Bennington College, Bennington, VT (SMS Site #2009-3963)**

Dear Mr. Tronsen:

The Sites Management Section (SMS) has received the report titled *Bennington College Underground Storage Tank (UST) Closure Inspections* that outlines the subsurface conditions encountered during the removal of several petroleum USTs. Fieldwork was conducted by KAS, Inc. on August 10-11, 2009. The following USTs were closed at the site:

- UST #001- a 500-gallon fuel oil UST (The Old Farmhouse)
- UST #002- a 1,000-gallon fuel oil UST (Orchard C House)
- UST #003- a 1,000-gallon fuel oil UST (Orchard E House)

No significant contamination was encountered during the removal of the tank at The Old Farmhouse. The tanks at the Orchard C House and Orchard E House were described as being in poor condition. Soils screened for volatile substances using a photoionization detector had peak readings of 537 parts per million (ppm) and 38 ppm, respectively. Groundwater was encountered in contact with contaminated soil at both areas at a depth of approximately 6 feet below grade. The limits of contamination were not defined. The indoor of the Orchard C House was screened using a PID and found to have readings up to 7.1 ppm. This elevated reading was attributed to a paint-like odor detected in the basement. The indoor air of the Orchard E House was not screened during the UST removal. The nearest water supply is located approximately 700 feet from these USTs.

Based on the report information, the SMS concurs with KAS that additional investigation work is necessary to determine the severity of the contamination. Due to the possible contamination to nearby receptors, the SMS requests that you have your consultant perform the following:

- **Further define the degree and extent of contamination to the soil.**
- **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 8021 and total petroleum hydrocarbons (TPH) using 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 the evaluation.

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- **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 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 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 underground storage tank at the Orchard Houses is eligible for participation in the Petroleum Cleanup Fund (PCF). The SMS must receive written proof that Bennington College holds 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. If the same insurance company is covering these properties as the other Bennington College sites, you do not need to submit a duplicate copy of the policy.

The owner or permittee must pay for the removal and/or repair of the failed tank(s), and for the initial \$500 of the cleanup (\$250 for each of the two releases). The fund will reimburse the tank owner or permittee for additional eligible cleanup costs of up to \$1 million per release. All expenditures must be pre-approved by the Agency or performed in accordance with the "Site Investigation Guidance" expressway program.

Please feel free to contact me with any questions at (802)-241-3731.

Sincerely,



Ashley Desmond, Environmental Analyst  
Sites Management Section

C: Jeremy Roberts, KAS (submitted via e-mail)  
DEC Regional Office – Rutland (submitted via e-mail)  
Bennington Health Officer  
Bennington Selectboard