

State of Vermont

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Waste Management Division
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April 13, 2010

John Rice
Rutland Public Schools
6 Church St.
Rutland, VT 05701

RE: Petroleum Contamination

Site: Rutland Middle School, 67 Library St., Rutland, VT (SMS Site #2010-4045)

Dear Mr. Rice:

The Sites Management Section (SMS) has received the underground storage tank (UST) closure report for the above referenced property, which was submitted by Otter Creek Engineering (OCE). Contamination was encountered at this site following removal of a heating oil UST in July, 2009. The following tanks were removed/closed at the site:

- UST #001, a 10,000-gallon heating oil UST, closed in place
- UST #002, a 550-gallon heating oil UST, removed

No contamination was encountered during the in-place closure assessment work for UST #001. UST #002 was found to have failed, with numerous holes identified in the tank walls. During the removal process, soils screened for petroleum vapors using a photoionization detector (PID) had readings up to 106 parts per million (ppm). Petroleum contamination was observed in contact with the shallow groundwater table beneath the tank. Potential receptors of contamination in this area include soils, groundwater, indoor air and the utility corridors.

Based on the report information, the SMS is requiring additional investigation work at this property. Due to the risk to nearby receptors, the SMS requests that you have your environmental consultant perform the following:

- **Further define the degree and extent of contamination to the soil.** Soil borings should be advanced to determine the limits of soil contamination. Soils should be screened for volatile substances at frequent intervals during the boring installation using a PID. If no groundwater is encountered during the soil boring work, confirmatory soil samples should be collected and analyzed for volatile organic compounds (VOCs) using EPA Method 8021B.
- **Determine the degree and extent of contamination, if any, to groundwater.** At least four monitoring wells should be installed. Analyze groundwater samples for VOCs using EPA Method 8021B and TPH using EPA Method 8015 (DRO).

OVER→



- **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. Any at-risk water supplies should be sampled 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 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, investigation activities related to petroleum contamination at this property may be eligible for reimbursement from the VT Petroleum Cleanup Fund (PCF). Rutland Public Schools must provide written proof that no applicable insurance exists in order to receive reimbursement from the PCF. Documentation must include a complete copy of the **applicable property or liability policies** that were in place on the date the contamination was discovered; and a **pollution coverage statement** from the insurance carrier(s). The statement(s) 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.

The owner or permittee must pay for the initial \$250 of the investigation work. The fund will reimburse the tank owner or permittee for additional eligible cleanup costs of up to \$1 million. All expenditures must be pre-approved by the Agency or performed in accordance with the "Site Investigation Procedure" expressway program. Please refer to the guidance document titled, "Procedures for Reimbursement from the Petroleum Cleanup Fund" for additional information concerning the PCF, which is available with other SMS publications at <http://www.anr.state.vt.us/dec/wastediv/publications.htm>.

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: William Norland, OCE (sent via e-mail)
DEC Regional Office – Rutland (sent via e-mail)
Rutland Board of Alderman (sent via e-mail)
Rutland City Health Officer