

State of Vermont
Department of Environmental Conservation
Waste Management Division
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November 15, 2010

VINCENT GIORDANO
GE HEALTHCARE
101 CARNEGIE CENTER 217 NORTH
PRINCETON, NJ 08540

RE: Site Management Activity Completed – GE Healthcare, 25 Green Mountain Drive, South Burlington
SMS Site #2010-4062

Dear Mr. Giordano:

The Hazardous Sites Management Section (HSMS) has reviewed the October 21 2010 report titled “Corrective Action Plan Implementation Report” prepared by Heindel & Noyes (H&N) for work conducted at the above referenced site. The HSMS has also reviewed information contained in the site file. With this information, the HSMS can now make the following conclusions:

- ! During a Phase II Environmental Site Assessment (ESA) performed in June 2010, concentrations of polynuclear aromatic hydrocarbons (PAHs) above US Environmental Protection Agency Regional Screening Levels (USEPA RSLs) for residential soils were detected at eight specific areas of the site property. PAHs were detected above USEPA RSLs for industrial soils at three of those locations. The Phase II ESA report (dated July 2010) identified PAHs in shallow soils (0 to 6 inches) at the soil boring locations in each of the eight areas. Deeper soils and groundwater did not appear affected based on laboratory analyses.
- ! Arsenic was detected in all soil samples (regardless of depth) above the USEPA RSL for industrial soils of 1.6 milligrams per kilogram. The concentration of arsenic ranged from 1.7 to 7.5 milligrams per kilogram. The range and detection of arsenic in every sample collected suggests that arsenic is naturally present in site soils.
- ! A Corrective Action Plan (CAP) for addressing the PAH contaminated soils was submitted to the HSMS on July 30, 2010. The CAP consisted of excavation and off-site disposal of contaminated soils from the three areas with PAH concentrations above the USEPA RSL for industrial soils and replacement with clean fill material. The goal was to remove soils so that remaining concentrations of PAHs in soils were below USEPA RSLs for industrial soils. The CAP was approved on August 24, 2010 and excavation activities began the first week of September.
- ! Approximately 720 cubic yards (approximately 808 tons) of fill material was excavated from three areas at the site in August and September 2010. The excavated soils were transported under bills of lading by Waste Management, for disposal at the Waste Management Turnkey Landfill in Rochester, New Hampshire.
- ! During excavation activities at the site, approximately 30 cubic yards of asbestos-containing siding materials were discovered in one of the excavation areas. These non-friable asbestos containing materials were removed, transported, and disposed of at the Waste Management Turnkey Landfill in



Rochester, New Hampshire in accordance with a Permit to Operate issued by the Vermont Department of Health, Asbestos and Lead Regulatory Program on September 27, 2010.

- ! Following confirmation that the PAH impacted soil had been removed from the three target areas, each excavated area was backfilled with compacted fill from Fontain's Sand Pit in Williston, Vermont.
- ! To address areas of the site where PAH concentrations in surface and near-surface soil are below the USEPA RSL for industrial soil but above the RSL for residential soil, a land record notice was filed with the City of South Burlington for the property on November 2, 2010. The notice documents the corrective action performed at the site, states that the site is appropriate for its current use as a commercial office building, and requires that any subsurface work, excavation, groundwater extraction or change in land use at the site be noticed to the Department of Environmental Conservation Waste Management Division.
- ! The nearest surface water is North Brook, which borders the property to the east and south.
- ! Several National Wetland Inventory wetlands are mapped within one mile of the site; none is closer than 1/16 mile.
- ! No public or private water supply wells lie within a one mile radius of the site. Water and sewer service to the site and surrounding buildings is provided by the City of South Burlington. That water supply is not at risk from contamination from this site.
- ! No other sensitive environmental receptors were identified.
- ! No unacceptable risk to human health and the environment is present under the current land use due to any remaining residual contamination.

Based on the above, the HSMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release GE Healthcare of any past or future liability associated with the contamination onsite. It does, however, mean that the HSMS is not requesting any additional work in response to the discovery of PAH contaminated soils in June 2010.

Please feel free to call with any questions.

Sincerely,



Chuck Schwer
Chief, Hazardous Sites Management Section
Waste Management Division

CC: South Burlington City Manager
South Burlington Health Officer
DEC Regional Office, Essex (via electronic mail)
Kim Kesler-Arnold, MWH Americas Inc. (via electronic mail)
Steve Larosa, Heindel and Noyes (via electronic mail)