

State of Vermont
Department of Environmental Conservation
Waste Management Division
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June 27, 2011

MICHAEL WHITE
49 DEEPWOOD DRIVE
BRATTLEBORO, VT 05301

RE: Sites Management Activity Complete, Kingdom Hall, SMS #2010-4114, Whitingham, Vermont

Dear Mr. White:

The Sites Management Section (SMS) has reviewed the June 10, 2011 report '*Summary Report for Drinking Water Sampling, Kingdom Hall, 610, VT Rt 100, Whitingham, VT*' prepared by Environmental Compliance Services. The SMS also reviewed information contained in the site file and, with respect to the release associated with the removal of one 1,000 gallon fuel oil underground storage tank (UST) in August 2010 makes the Sites Management Activity Complete (SMAC) determination described further below:

- During the removal of a 1,000 gallon heating oil UST black stained soil was encountered. During site activities soil samples were screened for volatile organic compounds (VOCs) using a photoionization detector (PID). The maximum reading was 420 parts per million (ppm). The tank was over excavated and 16.2 tons (11 yd³) of contaminated soil were transported off site for proper disposal at ESMI in Loudon, NH. Groundwater was not encountered at the maximum depth of 10'.
- Black stained soil was reported to have been concentrated in a band from 4-6' depth with PID readings generally decreasing with increasing depth. The UST was adjacent to the foundation of the building and a foundation drain line was encountered at approximately 3' depth. The SMS spoke with Ms. Flammia, ECS, regarding the depth of contamination and potential for impact to the foundation drain and transport of contamination through or along the drain¹.
- Four confirmatory soil samples were collected from the bottom and tank pit sidewalls after excavation. They were screened using a PID and VOC levels ranged from 35.5 ppm (bottom) to 95.6 ppm (northeast wall). These soil samples were also analyzed in a laboratory for total petroleum hydrocarbons (TPH) by EPA method 8015 DRO. The TPH values ranged from 28.2 mg/kg to 86.4 mg/kg along the bottom, southeast, and east walls of the excavation. The northeast wall sample along the foundation had a TPH level of 3,650 mg/kg. TPH does not have a Vermont regulatory standard, but is used as a guideline for general petroleum contamination. Although left in place along the foundation, this soil is under ~4' of clean fill and is not accessible to direct human contact.

¹ February 7, 2011 telephone call between Alicia Flammia, ECS, and Gerold Noyes, SMS.

Over



- The northeast wall sample was also analyzed for VOCs by EPA method 8021B. The highest VOC level was 4.91 mg/kg of 1,2,4-trimethylbenzene; the EPA regional screening level for this compound is 67 mg/kg for residential soils. Confirmatory sampling of the site water supply well and additional investigation of the foundation drain were required by the SMS.
- On May 6, 2011 ECS collected a drinking water sample from the site water supply well for analysis by EPA Method 524.2. No VOC contamination was detected.
- A small stream flows approximately 50' from the site building. The stream bank was inspected for evidence of oil contamination and a sheen was observed on the surface water of the brook. While on site a neighbor reported that he had observed a sheen 2 weeks earlier. The water was sampled and no VOC contamination was detected. ECS returned to the site on May 19 and you, Mr. White, also visited the site on May 25. On both occasions no sheen was observed.
- The stream bank was inspected for a foundation drain outfall and none was found. 4 test pits were dug along the stream bank in an effort to find a foundation drain outfall. Soil from the test pits was screened using a PID, but no elevated PID readings were noted. Sediment disturbed during this activity did not produce a sheen on the water. No source of the reported sheen could be found. ECS suggested that it could also have resulted from stormwater runoff from Rt 100.

Based on the above, the SMS is assigning this site a Site Management Activity Completed designation. This SMAC designation does not release you, Mr. White, of any past or future liability associated with petroleum contamination onsite. It does, however, mean that the SMS is not requesting any additional work in response to the August 2010 1,000 gallon fuel oil UST removal from your property.

Please feel free to call with any questions.

Sincerely,



Chuck Schwer
Program Manager, Sites Management Section

CC: Whitingham Selectboard
Whitingham Health Officer
DEC Regional Office (via electronic mail)
Alicia Flammia, ECS (via electronic mail)