

**State of Vermont**  
**Department of Environmental Conservation**  
**Waste Management & Prevention Division**  
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**March 11, 2013**

Richard Pembroke  
Southwestern Vermont Supervisory Union  
246 South Stream Road  
Bennington, VT 05201

RE: Sites Management Activities Completed, Former Museum of Black WWII History  
179 Oak Hill School Road, Pownal, Vermont (SMS Site #2012-4321)

Dear Mr. Pembroke:

The Sites Management Section (SMS) has recently conducted a review of the above referenced site file. Information contained within our site file includes the following:

- On July 23, 2012, a 550 gallon No. 2 heating oil underground storage tank (UST) was permanently closed and removed from the site. There was heavy rusting of both the UST and the fuel lines, and a ¼" diameter hole was noted at the bottom of the west end of the tank. The UST had not been in use for over ten years and was found to be empty. The excavation extended to about eleven feet below ground surface. Cream or gray layered clay was found from approximately seven feet below ground surface to the bottom of the excavation. Some soil staining from heating oil was encountered. The maximum photoionization detector (PID) reading was 223 parts per million (ppm), directly below where the hole on the west end of the tank was located. Petroleum odors were significant in the excavation. The lateral extent of contamination could not be determined due to the UST being up against the site building foundation and between two outdoor stairways. Deeper excavation was not possible due to the size of the excavator. Groundwater was not encountered.
- The area is served by the Pownal Fire District #2 Water System. The air within the site building (including the partial basement and crawl space) was screened on July 23, 2012 and evidence of contamination was not found by either PID or olfactory observations. The Hoosic River is the closest surface water, approximately 1,600 feet west of the site.
- On October 11, 2012, six soil borings were advanced using a hollow stem auger. One boring was advanced in the former UST pit and the other five were advanced outside the pit to delineate the degree and extent of contamination. All borings were advanced to approximately 22 feet below ground. No groundwater table was encountered in any boring, with only moist soils perched on the initial clay layer at approximately seven feet below ground surface. The only evidence of contamination was found at the location of the former UST pit. There, the maximum PID reading was found in a soil sample between seven to nine feet below ground surface. A soil sample from this interval was analyzed at a laboratory for individual volatile organic compounds (VOCs). The sample contained low levels of petroleum hydrocarbons below the SMS "Soil Screening Values." No evidence of contamination below nine feet was encountered.

(Over)



- A plan was formulated for removing an exterior stairway to access and remove the contaminated soil. On February 5, 2013, the soil analysis of a representative sample for soil treatment at ESMI of New York contained 3,200 mg/kg of total petroleum hydrocarbons, and resembled No. 2 heating oil. From February 12-14, 2013, a total of 34.53 tons of contaminated soil was excavated, shipped and treated at ESMI in New York.
- Any residual soil contamination does not pose an unacceptable risk to human health or to the environment and should be naturally attenuated over time.

Based on the above, it appears that this site does not pose an unacceptable risk to human health or the environment. Therefore, the SMS is assigning the site a Sites Management Activities Completed (SMAC) designation. The SMAC designation does not release Southwestern Vermont Supervisory Union from any past or future liability associated with the heating oil contamination at this site. It does, however, mean the SMS is not requesting any additional work in response to the petroleum UST contamination at this time.

Should you have any questions, please do not hesitate to call me; I may be reached at (802) 828-1138.

Sincerely,



Chuck Schwer  
Chief, Sites Management Section

CC: **Mailed Electronically**

Paul Miller, Consulting Hydrogeologist ✓  
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