

**State of Vermont**  
**Department of Environmental Conservation**  
**Waste Management & Prevention Division**  
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September 25, 2014

DG Strategic II, LLC  
100 Mission Ridge  
Goodlettsville, TN 37072  
Attn: Sr. Corporate Counsel/Real Estate

RE: Sites Management Activities Completed, 262 North Main Street, Bennington, Vermont (SMS Site #2013-4361)

To Sr. Corporate Counsel/Real Estate:

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:

- A *Phase II Environmental Site Assessment* was conducted for the 262 North Main Street property by Wilcox & Barton for the prospective purchaser of the property, Zaremba Program Development, LLC. The Phase II report was dated January 22, 2013. The Phase II investigation was conducted due to past uses of the property as well as uses of adjacent properties which may have caused contamination to be present at the 262 North Main Street property.
- Work completed during the Phase II Assessment included a Ground Penetrating Radar (GPR) survey, the advancement of four borings and subsequent installation of four groundwater monitoring wells, and the collection and analysis of soil and groundwater samples. Soil samples were analyzed for volatile organic compounds (VOCs), total petroleum hydrocarbons (TPH), PAHs, RCRA 8 metals and PCBs. Groundwater samples were analyzed for VOCs and RCRA 8 metals.
- Contaminants present in soil at concentrations in excess of Vermont Soil Screening Values (SSVs) included arsenic and benzo(a)pyrene. While arsenic was detected above the SSVs in four soil samples, concentrations were only above what is considered to be representative of background conditions in one soil sample (SB-2). Benzo(a)pyrene was also detected above the SSV in SB-2. No contaminants were detected in groundwater above the Vermont Groundwater Enforcement Standards (VGES).
- Wilcox and Barton submitted a *Work Plan for Remedial Activities* dated August 8, 2013 which addressed soil contamination in the vicinity of SB-2. The work plan proposed a limited excavation and subsequent collection of confirmation soil samples. The work plan was approved by the SMS on August 9, 2013. Approximately eleven cubic yards of soil was excavated from the area surrounding SB-2 on August 16, 2013. Following excavation, five soil samples were collected from the sidewalls and base of the excavation. Soil samples were analyzed for PAHs via EPA Method 8270 and for RCRA 8 Metals via EPA Method 6010. Benzo(a)pyrene was detected in two samples at concentrations of 0.26 mg/kg and 1.6 mg/kg, which is slightly in excess of the industrial Soil Screening Value (SSV) of 0.21 mg/kg. Dibenzo(a,h)anthracene was also detected in one soil sample at 0.31 mg/kg, which is slightly in excess of the industrial SSV of 0.21 mg/kg. Arsenic was detected at concentrations in excess of the SSVs but within what is considered background concentrations in Vermont. The excavation was filled with clean fill. The 11 cubic yards of contaminated soil was disposed of at the Waste USA Landfill in Coventry, Vermont.



- The property was vacant during the completion of the Phase I and Phase II site assessments. In order to address contaminated soil which may be encountered during construction of new building onsite, a Soil Management Plan dated September 6, 2013 was developed. During subsequent construction, all soil encountered was dealt with according to the Soil Management Plan. During construction activities, all native material was paved over, placed under landscaped areas with loam and seed, or capped by the building footprint sidewalks.
- The Phase I Environmental Site Assessment dated October 24, 2012 by Wilcox & Barton stated that the surrounding properties were connected to municipal water and sewer. The property is bordered by commercial properties and one residential property.
- MW-2 was properly abandoned on August 16, 2013 according to the Water Supply Rule, Chapter 21, Section 12.3.5. The casing and roadboxes of the remaining three monitoring wells were removed and disposed of during construction activities and the ground surface was subsequently reworked and paved.

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 DG Strategic II, LLC from any past or future liability associated with the PAH soil contamination at this site. It does, however, mean the SMS is not requesting any additional work in response to the contamination discovered during the Phase II Site Assessment at this time.

Should you have any questions, please do not hesitate to call me; I may be reached at (802) 249-5324.

Sincerely,



Chuck Schwer  
Chief, Sites Management Section

CC: Bob Rooks- Wilcox & Barton (submitted electronically)  
DEC Regional Office - Rutland (submitted electronically)  
Bennington Select Board (submitted electronically)  
Bennington Health Officer (submitted electronically)