

November 25, 2013

Chuck Schwer, Section Chief
VTANR/DEC
Waste Management & Prevention Division
Site Management Section
1 National Life Drive – Davis 1
Montpelier, VT 05620-3074

Re: Request for a Sites Management Action Completed (SMAC) Determination
FairPoint Utility Pole Storage Area
5016 U.S. Route 5, Derby, Vermont
St.Germain Collins File No.: 3440.1

Dear Mr. Schwer:

On behalf of FairPoint Communications (FairPoint), St.Germain Collins is submitting this letter requesting a Sites Management Action Completed (SMAC) Determination for the above-referenced facility (Site) located in Derby, Vermont. By way of background, St.Germain Collins removed soil contaminated by utility pole preservatives between May and August 2013. This remediation was documented in a Corrective Action Report sent to you on September 17, 2013. Since that time, Hugo Martinez Cazon of the Vermont Department of Environmental Conservation (VTDEC) has requested clarification of several issues related to the remediation via email, and it is our understanding that he is satisfied with our responses.

We believe that we have met the corrective action objective of removing soil with contaminant concentrations above the VTDEC Residential Soil Screening Levels (RSSLs). All confirmatory samples were reported with contaminant levels below the RSSLs with one minor exception for dioxin where one sample was reported at 4.7 parts per trillion (ppt), slightly over the RSSL of 4.5 ppt. We believe that quantification of dioxin levels in a heterogeneous soil at such a low detection level is at the limit of laboratory precision and accuracy, and that we have met the intent of the RSSLs at this location.

Groundwater was not considered a media that could be contaminated by the utility pole preservatives because of: 1) the low solubility of the contaminants of concern (e.g., dioxin and pentachlorophenol), 2) the limit in depth of detected contaminants in soil (30 inches), and 3) our experience in sampling groundwater at other pole yard remediation sites in Vermont and New Hampshire, where utility pole contaminants were not found. Contaminant vapor migration was similarly not considered a risk to human health due to the very low vapor pressure of the contaminants.

EXPERIENCE YOU CAN RELY ON
WHEN IT COUNTS

Because the soil was remediated to below the RSSLs, institutional controls such as deed restrictions or future maintenance of the Site are not warranted.

If you have any questions, please contact us at 207-591-7000.

Sincerely,
ST.GERMAIN COLLINS

A handwritten signature in black ink that reads "Keith R. Taylor". The signature is written in a cursive style with a long horizontal flourish at the end.

Keith R. Taylor, ME CG, NH PG
Senior Environmental Geologist

cc: Scott Allocca, FairPoint Communications