



AGENCY OF NATURAL RESOURCES

**State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704**

May 20, 2016

Mr. William Young and Ms. Sally Young
28 N. Williams Street
Burlington, Vermont 05401

RE: Corrective Action Plan approval
SMS 2013-4436

Dear Ms. and Mr. Young:

The Vermont Department of Environmental Conservation (VTDEC) has reviewed the Corrective Action Plan (CAP) presented April 11, 2016 on your behalf by Waite-Heindel Environmental Management (WHEM). The Corrective Action Plan is approved for implementation, pending public comment. The VTDEC requests that the Town Clerk's Office open a two-week comment period, to extend to June 6th.

Corrective Action measures will be implemented, to monitor and control the discharge of petroleum hydrocarbon compounds to the municipal infrastructure, and to monitor and control the migration of associated vapors to the indoor air environment. The chemical of concern is Naphthalene, related to a leaking fuel oil underground storage tank.

These corrective measures will include: 1) Achieving compliance with City/State requirements by operating the basement sump system under a General Discharge Permit 3-9016; 2) Treating the sump discharge with granular activated carbon before discharge to the City combined sewer system; 3) Monitoring of system effluent parameters twice a month and influent parameters once a month, in compliance with General Discharge Permit 3-9016; 4) Ongoing groundwater quality monitoring for a 5-year period. The corrective actions will allow also for the alternative remediation of the source area using REGENESIS ORC Advanced®, a product that optimizes the subsurface for enhanced aerobic degradation of petroleum compounds, and which would be injected into the groundwater at three locations within and immediately upgradient of the identified source area. This alternative is at the discretion of the VTDEC, to achieve corrective action goals. WHEM will reassess the long-term monitoring strategy in an effort to achieve timely site closure.

The system will be deactivated upon achieving consistent groundwater concentrations below the Vermont Groundwater Enforcement Standards, and continued indoor air readings of petroleum fuel related vapors, below the Vermont Indoor Air Standards.



The Corrective Action Plan is approved as amended for implementation, upon closure of the comment period, June 6th, 2016.

Sincerely,

A handwritten signature in blue ink, appearing to read 'HMCazón', is positioned above the printed name.

Hugo Martínez Cazón, PE
Sites Management Section
Vermont Department of Environmental Conservation

Cc: City of Burlington
City of Burlington
VTDEC Regional Office
Miles Waite, Geologist

Town Clerk's Office
Town Health Officer
Waite-Heindel Environmental Management, LLC