



State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
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Montpelier, VT 05620-3704
(802) 522-4595
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November 12, 2021

Mr. Bryan Gamache – *via email*
SB Collins, Inc.
54 Lower Weldon Street
St Albans, VT 05478

RE: Wilmington Jolley, 87 East Main Street, Wilmington; SMS Site #2021-5057; Initial Release Notification Letter

Dear Mr. Gamache:

On September 16, 2021, the Agency of Natural Resources, Department of Environmental Conservation, Waste Management and Prevention Division, Spill Program, received notification of a release of hazardous materials at the above-referenced property. As owner of a retail motor fuel dispensing property located at 87 East Main Street (Vermont Route 9) in Wilmington, SB Collins, Inc. may be considered liable and a potentially responsible party. As established in §10 V.S.A. 6615, a person who is determined to be liable for the release is required to take actions to determine the degree and extent of the contamination at the site. This letter details the actions SB Collins, Inc. must take to continue with investigation and monitoring for this release of gasoline from an apparent release identified during a recent piping replacement and sump upgrade of the underground storage tank (UST) system at the site.

Information gathered to date concerning the release includes the following:

- On September 15, 2021, Vermont HydroGeo, LLC (VHG) completed an environmental assessment during a piping replacement and sump upgrade project for the UST system located at the Wilmington Jolley (UST Facility #2744). During the assessment, VHG used a photoionization detector (PID) to screen soils for the presence of volatile organic compounds (VOCs) in pea stone and fill material located around the piping runs and sumps. Soil samples collected from around the sump for the existing 8,000-gallon gasoline UST (UST #2000-1) exhibited PID readings as high as 800 parts per million by volume (ppmv) at 3 feet below ground surface (bgs). Soil samples collected from beneath the fill port of the UST #2000-1 exhibited a PID reading of 10 ppmv at a depth of 2.5 feet bgs. PID readings of 162 ppmv and 254 ppmv were recorded at 2.5 and 3 feet bgs, respectively, from soil samples collected beneath the fill pipe of the 15,000-gallon gasoline UST (UST #2000-2). PID readings were below action limits in soils screened under the sump of UST #2000-2 and also in soils located at a depth of 1.5 feet bgs at the former fuel dispensers. No work was completed in the vicinity of a 2,000-gallon heating oil UST (UST #2000-3) which is also an active, registered UST at the site.
- Groundwater was not encountered in the excavation which was only extended to a maximum exploratory depth of 3 feet bgs due to the nature of the work being completed. Groundwater is expected to be relatively shallow due to the observation of the two USTs being anchored down with concrete to keep the USTs from floating on the groundwater table. Bedrock was also not encountered. The full extents of contamination in soils and groundwater have not been delineated.



Based upon the information detailed above, SB Collins, Inc. must retain the services of a qualified environmental consultant to conduct the following:

- A. Conduct an Initial Site Investigation (ISI) in accordance with Subchapter 3 – Site Investigation of the *Investigation and Remediation of Contaminated Properties Rule (IRule)*.
- B. Provide the Sites Management Section (SMS) with a work plan for approval prior to implementing the ISI. The work plan must be submitted within 30 days of this letter.

Based on current information, investigation activities related to petroleum contamination at this property may be eligible for reimbursement from the Vermont Petroleum Cleanup Fund (PCF). SB Collins, Inc. must provide written proof that no applicable insurance exists in order to receive reimbursement from the PCF. Documentation required must include a complete copy of the applicable property or liability policies that were in place on the date the contamination was discovered; and a pollution coverage statement from the insurance carrier(s). The statement(s) must include name and address of the insurer, the name of the policyholder, policy number(s) and dates of coverage. The name and telephone number of the claims analyst or contact person is also necessary, and if coverage is denied, then a statement referencing specific policy language invoked to deny coverage of the claim.

If eligibility for the PCF is established, the tank owner or permittee must pay for the initial \$10,000 of the cleanup (deductible). The PCF will reimburse the tank owner or permittee for eligible cleanup costs of up to \$1,240,000 per release. All expenditures must be pre-approved by the SMS to be reimbursed. Site investigation work must follow the IRule, which may be found on our website: <http://dec.vermont.gov/waste-management/contaminated-sites/rule>. In addition, information regarding the PCF may be found in the *Procedures for Reimbursement from the Petroleum Cleanup Fund* document, which is located on our website: http://dec.vermont.gov/sites/dec/files/documents/PCFReimb_11_Rev.pdf.

SMS Site number **2021-5057** has been assigned to the property for tracking purposes. This number must be referenced on all submitted documentation pertaining to the site. Failure to conduct the necessary site work is a violation of Vermont Statutes and may result in State Enforcement Action. Enforcement Action may be a Civil Complaint and penalty pursuant to 10 V.S.A §8019 or an Administrative Order pursuant to 10 V.S.A §8009 including compliance order, penalties, corrective action, and any other measures deemed appropriate.

Feel free to contact me with any questions or if I can be of any assistance.

Sincerely,



Michael Nahmias, Environmental Analyst
Sites Management Section

- C: Eric J. Swiech, Vermont HydroGeo, LLC (*via email*)
DEC Regional Office, Springfield (*via email*)
Wilmington Health Officer (*via email*)
Wilmington Town Manager (*via email*)