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September 29, 2023

Ms. Heidi Britch-Valenta  
Swanton Village Grant Specialist / Program Coordinator  
P.O. Box 279  
120 First Street  
Swanton, VT 05488

Re: Data Gap Analysis – Former Carroll Concrete, 124 First Street, Swanton, VT,  
VT DEC SMS #2023-5349

Dear Ms. Britch-Valenta:

The following is a summary of the data gap analysis completed by KAS, Inc. (KAS) regarding the former Carroll Concrete property located at 124 First Street, Swanton, Vermont ("Site" or "property"). This work was completed in accordance with KAS' Cost Proposal dated August 18, 2023, which was approved by the Village of Swanton. Funding for this work is being provided by the Northwest Regional Planning Commission (NRPC) through the State Brownfields Revitalization Assessment Grant Program per NRPC's grant agreement with Mount Ascutney Regional Commission effective November 1, 2021.

### **Background and Site History**

The property formerly operated as the Carroll Concrete facility until circa 2020. The former building and concrete batch plant have been demolished and currently the property is vacant. The former building was constructed on a concrete slab foundation and reportedly consisted of office space, a concrete batch facility, former maintenance areas and storage areas. Reportedly only light maintenance occurred at the property. Prior to the property being vacated the following operations were reportedly conducted: filling of trucks with diesel fuel, limited truck maintenance in the garage and storage and use of concrete additives.

In June 1999, three (3) 4,000-gallon underground storage tanks (USTs) were closed at the property. An initial site investigation was conducted in 1999 and at this time it was documented that a 2,000-gallon gasoline UST had been closed in place ten years ago. Reportedly the tank was filled with concrete and it is not known if the tank was cleaned prior to backfilling.

In 2007, Heindel and Noyes installed four monitoring wells at the property. Groundwater and soil contamination was noted. Groundwater monitoring was conducted at the property and in 2015, results indicated that all concentrations were below the Vermont Groundwater Enforcement Standards (VGES) and the site received a Sites Management Activity Complete (SMAC) designation in 2017 after the monitoring wells were closed.



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In November 2014, Heindel & Noyes completed a Phase I Environmental Site Assessment (ESA) at the property. At the time of the assessment, the property was owned and operated by Carroll Concrete. The property was being used as a concrete batch plant and had reportedly been used for such use since the 1960's. Two RECs were identified during the Phase I ESA as follows; 1) a release of petroleum with associated state hazardous waste site (SHWS) listing and ongoing monitoring and, 2) the documented presence of floor drains inside the building one of which that discharged to the brook across Robin Hood Drive.

In January 2020, the Verterre Group completed a Phase I ESA at the Site. At the time of this assessment the property was not in active use and contained the former office and concrete batch plant building. One REC and one historical REC were identified during the Phase I ESA, as follows; REC 1) the current and past use of the property as a concrete plant with USTs and above ground storage tanks; and, HREC 1) the past presence of the floor drains and their points of discharge.

In January 2020, The Verterre Group also completed a Phase II ESA at the property which included the advancement of eleven (11) soil borings around the property. The Phase II ESA was conducted to address the REC identified during the completion of a Phase I ESA. Soil contamination was noted in three borings: one proximate to the former USTs located in the northern section of the property, one located proximate to the closed in place UST and one near the former UST located along the southern portion of the property. Groundwater impacts above VGES was present in four of the five temporary wells monitoring wells. Polycyclic aromatic hydrocarbons (PAHs) were not noted above laboratory reporting limits in the samples collected from the upper 2-feet of soil at the site. However, the laboratory reporting limits for PAHs were higher than the Vermont Soil Standard (VSS).

Following completion of the Phase II ESA, The Verterre Group recommended further investigation to determine whether off site migration is occurring towards Elm Street and that the closed in place gasoline UST be exposed with an excavator to determine if it was properly closed. If the UST was not properly closed it was recommended the tank be cleaned and closed. This work has not been completed to date.

### **Summary of Data Gaps**

Following a review of all known historical environmental documents associated with the Site, KAS has identified the following data gaps for the property:

1. The presence of a closed in place gasoline UST without a formal assessment;
2. The absence of full dissolved phase plume delineation to determine whether the contamination is confined to the Site boundary per the State of Vermont Investigation and Remediation of Contaminated Properties Rule (I-Rule);
3. The previous PAH laboratory reporting limits for shallow soil samples were elevated and the data cannot be properly compared to VSS;
4. The shallow soil samples previously collected by the Verterre Group were not obtained from the 0 – 18" interval to properly evaluate shallow conditions in accordance with the I-Rule;



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5. The floor drain which was previously identified to discharge at an offsite location has not been investigated; and,
6. The southern portion of the property across Short Street appears to not have been included in the previous environmental assessments.

KAS recommends a Phase II ESA be completed to address the data gaps identified for the property.

If you have any questions regarding this summary, please call me at 802-383-0486 or email me at [JeremyR@kas-consulting.com](mailto:JeremyR@kas-consulting.com).

Sincerely,

A handwritten signature in black ink, appearing to read "J. Roberts", written over a faint, larger signature.

Jeremy Roberts, P.G.  
Vice-President / Environmental Program Manager

Cc: Mr. William Sheets, Village of Swanton  
Ms. Greta Brunswick, NRPC  
Ms. Stephanie Helburn, VT DEC  
KAS #505230705