



State of Vermont

Department of Fish and Wildlife
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Department of Environmental Conservation
State Geologist
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AGENCY OF NATURAL RESOURCES Department of Environmental Conservation

Waste Management Division
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October 7, 1997

Mr. Jack Taylor
Vermont Dowel & Square
P.O. Box 1466
Norwich, VT 05055

RE: Site Management Activity Completed (SMAC) for the former True Temper Mill in St. Johnsbury (Site #77-0188)

Dear Mr. Taylor:

The Sites Management Section (SMS) has received the Johnson Company's October 6, 1997 letter which included recent groundwater analytical results from the former True Temper Mill site in St. Johnsbury. The letter and analytical results indicate non-detect levels of contaminants of concern to be present in the area of MW-2, which was the only onsite monitoring well to historically contain contamination. Based on the results of this recent sampling, the SMS has determined that the Vermont Dowel & Square have met the requirements placed on them by the SMS regarding the contamination which was detected in January, 1990.

This determination was based on the following:

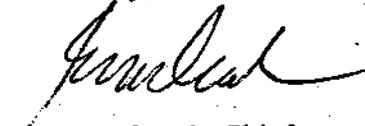
1. The True Temper Mill property was originally placed on the Vermont Hazardous Sites List following completion of an Environmental Site Assessment (ESA) dated February 1990 performed by the Johnson Company, Inc. Results of sampling performed during the ESA indicated levels of acetone and MTBE to be present in groundwater in MW-2 which exceeded the Vermont Groundwater Enforcement Standards.
2. The source of groundwater contamination in MW-2 was never determined. However, since the site has essentially performed the same business practice for over 110 years (a wood working facility), it is likely that contamination resulted from occasional spills over the years.
3. No groundwater contamination is present, based on analytical results from the three onsite monitoring wells which were installed and sampled as part of the Johnson Company's February 1990 ESA, and the above referenced analytical results reported from MW-2 in Johnson Company's October 6, 1997 letter.
4. Little to no risk is posed to sensitive receptors, such as the Moose River, by any residual

contamination which may remain in soil and/or groundwater at the site.

Based on the results of the investigation, the site has been assigned a Site Management Activity Completed (SMAC) designation. Sites which the Waste Management Division (WMD) have determined require no further management are given a SMAC designation. The designation does not release the Vermont Dowel & Square from any past or future liability which may arise from the contamination at the former True Temper Mill site. The SMAC designation does mean that the SMS isn't requiring any additional work be performed at this site in response to the initial contamination. If the monitoring wells are no longer used, then they must be properly closed to eliminate a possible conduit for contaminant migration into the subsurface. This closure typically involves filling the wells with a grout material to prevent fluid migration in the borehole. Specific requirements for well closure are outlined in Section 12.3.5 in appendix A of the Vermont Water Supply Rule-Chapter 21. Also, the road box or stand-up well guard for a monitoring well must be removed before well closure is considered complete.

Please feel free to call either myself or Chuck Schwer with any further questions or comments you may have.

Sincerely,



George Desch, Chief
Sites Management Section

c: Michael Rossi, The Johnson Company
St. Johnsbury Selectboard

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