



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
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Waste Management Division
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September 21, 2001

MICHAEL GAJEWSKI
CANUSA
1616 SHAKESPEAR STREET
BALTIMORE, MD 21231

RE: Northland Sports, Richford, Vermont, Site # 77-0189

Dear Mr Gujewski:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS), has reviewed the request for a Site Management Activity Completed (SMAC) designation as requested by the Johnson Company in a letter dated December 11, 2000 for the above referenced site. Based on the information contained in the request, as well as additional site file information, the SMS has concluded that the Northland Sports site is eligible for a SMAC designation. This conclusion is based on the following:

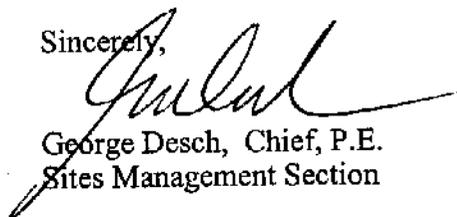
- In November 1994, approximately 160 cubic yards (yds³) of petroleum contaminated soils was excavated and polyencapsulated on site. Screening of soil by photoionization detector (PID) in November 1999 detected organic vapors between 0.0 and 0.2 parts per million (ppm). This meets the 1.0 ppm criteria as outlined in the document entitled "Agency Guidelines Petroleum Contaminated Soils and Debris." The soil has been re-vegetated in place.
- Contaminated soil was identified within a shallow (less than one foot deep) former concrete slab/foundation. PID screening of the soil identified readings up to 2,000 ppm. Analytical results identified the presence of ethylbenzene, xylene and 2 - butanone. TCLP analysis results indicate the soil does not qualify as a hazardous waste. The area was covered, mulched and re-vegetated.
- Analytical results for the two rounds of groundwater sampling (May 1995, November 1995) did not detect any EPA Method 8260 volatile organic compounds (VOCs) above analytical detection limits.
- Any residual contamination does not pose an unacceptable risk to human health or the environment.

Based on these findings, the SMS has determined a Site Management Activities Completed (SMAC) designation is warranted. The SMAC designation means that the SMS is not requiring that any additional work be performed at the site at this time and the site will be removed from the active hazardous sites list. This SMAC designation has no bearing on any other obligations which CANUSA may have under state or federal laws or regulations or the terms of the Assurance of Discontinuance which was filed October 13, 1993 with the State of Vermont Judiciary Department, Environmental Law Department, Docket No. E93-047.

If the monitor wells present at the site are no longer used or maintained, they must be properly closed to eliminate a possible conduit for residual contamination migration into the subsurface. Closure typically involves filling the wells with a grout material to prevent fluid migration into the borehole. Also the road box or well guard must be removed before closure is considered complete. Specific requirements well closure are outlined in Section 12.3.5 in Appendix A of the Vermont Water Supply Rule - Chapter 21.

If you have any questions please feel free to contact me (802) 241-3491 or Mike Young at (802) 241-3887.

Sincerely,



George Desch, Chief, P.E.
Sites Management Section

cc: DEC Regional Office
Richford Selectboard
Sal Spinosa, Director Enforcement Division
Mark Ollmann, WMD Attorney

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