State of Vermont

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January 7, 2005

DENNIS G. AMOROSE, P.E.
HERCULES INCORPORATED
RESEARCH CENTER 8139/8
500 HERCULES ROAD
WILIMINGTON DE 19808-1599

RE: Site Management Activity Completed, Hercules Rockingham Site, Rockingham (VTDEC Site #1991-1039).

Dear Mr. Amorose:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS), has recently reviewed the Notice to Land Records which was filed with the Rockingham, Vermont Town's Clerk office on October 17, 2003. From this and other information contained in the site file, the SMS concludes the following:

- The Simmonds Precision Products, Inc., facility was constructed in 1950. Prior to 1972, capillary tubing and thermometers for railroad cars were manufactured on-site. After 1972, items for aircrafts such as aircraft indicators and gauges for Boeing and Lockheed were manufactured on-site.

- In May 1991, an environmental site assessment was completed of the property. Exploratory test pits indicated the presence of Tetrachloroethylene (PCE) and Trichloroethylene (TCE) in the soils located near the paint room sink drain.

- In October 1991, soils were excavated in the vicinity of the paint room sink drain, associated piping and the pipe outfall area. The soils were stockpiled on-site.

- In April 1992, soil venting of the contaminated soil began. The system was run until June 1992 when, based on the reduction of chlorinated hydrocarbon concentrations in the soils, the target clean-up levels were achieved. Consequently, the remedial system was dismantled and the soils were thin spread on-site.

- Monitoring well ERM-8 has historically demonstrated low levels of chlorinated VOC concentrations. The latest monitoring event in November 2002 contained 1.3 ppb of Chloroform, 9.9 ppb of Trichloroethene and 2.8 ppb of Tetrachloroethene.

- Contaminant levels have been decreasing in this well since April 1995.

Based on the above, the SMS has determined that this site is now eligible for a Site Management Activity Completed (SMAC) designation. The SMS concludes that:

- the nature and extent of contamination has been adequately defined;
- any residual contamination does not pose an unacceptable risk to human health or the environment;
- all existing monitoring wells were properly closed on July 7, 2004, pursuant to Section 12.3.5 in Appendix A of the Vermont Water Supply Rule - Chapter 21 and;
- a Notice to Land Records was filed with the City of Rockingham which advises the public that prior to any subsurface work at the property the SMS must be notified. This information was recorded in book 0279, page 0094 on October 17, 2003.

Based on these findings, the SMS has determined that site management activities have been completed. The completion of these activities does not release Hercules of any past or future liability which may arise from the contamination discovered at the Hercules Rockingham Site. It does mean that the SMS is not requiring any additional work to be performed in response to the contamination discovered at this site.

If you have any additional questions or comments, please feel free to contact either me or Bruce Linton at (802) 241-3888.

The SMS appreciates your continued cooperation in this matter.

Sincerely,

George Desch, Chief
Sites Management Section

cc: Joe Hayes, ECS Environmental
Doreen Aldrich, Rockingham Town Clerk
DEC Regional Office