

State of Vermont
Department of Environmental Conservation
Waste Management & Prevention Division
1 National Life Drive – Davis 1
Montpelier, VT 05620-3704
(802) 828-1138
hugo.martinez.cazon@state.vt.us

August 14, 2014

Marie Wojtas
US Army Corps of Engineers
New England District
696 Virginia Road
Concord, MA 01742-2751

RE: **Feasibility Study Draft, Lyndonville Former Air Force Station**, East Haven
Sites **SMS#91-1152, SMS#2009-3914, SMS#2009-3915, SMS#2009-3916, and SMS#2009-3917**
FUDS#: D01VT0363-01
Stone Contract #: W912WJ-11-D-0001

Dear Ms. Wojtas:

I have reviewed the Feasibility Study Draft, submitted on your behalf by Environmental, Inc., dated July 2014.

Below please find my comments and request for clarification, as appropriate.

- The Remedial Investigation presented in 2013 stated that “A determination of applicable, or relevant and appropriate requirements will be made during the FS. Per 40 CFR 761.50, TSCA is potentially relevant and appropriate for the project.”
 - The Feasibility Study should state, whether TSCA is deemed jurisdictional, by your technical team.
- In the document sections addressing the UST area considered the potential source of the observed Naphthalene soil and groundwater impact, please clarify whether the tank in question has been removed, and whether the source area of product has been removed.
- Feasibility Study should clarify that any “fill” considered to perform localized capping should meet the condition of not contributing greater contamination than found in situ.
- Out of service former drinking water supply wells will need to be decommissioned.
- Feasibility Study should indicate whether the wetland areas on the parcels are listed on the Vermont Significant Wetlands Inventory list. In case these are on the list, the consultant should make a statement regarding whether the goal of “no net loss” of such wetlands and their functions will be achieved.
- Although the consideration of alternatives first states that engineering controls would not be considered, the Feasibility Study draft later proposes, appropriately, to implement fencing and postings, to control property access (see Section 5.4).
- The State of Vermont does have the authority to enter a Deed Restriction or can request the recording of an Environmental Covenant, and is not limited to only placing a Notice to Land Record. This should be clarified and developed in the Final Feasibility Study.
 - The State of Vermont sees a Deed Restriction as the more beneficial Land Use Control, as it allows the State to enforce the conditions of the Deed Restriction
- PAHs impacts, described by Stone Environmental, as affecting some areas in the near vicinity of former hydrocarbon storage tanks, may need further lateral characterization. Please clarify.



I am grateful to you and to Stone Environmental Inc, for the opportunity to comment on the Draft Feasibility Study.

Sincerely,

A handwritten signature in blue ink, appearing to read "HMCazon".

Hugo Martinez Cazon

Cc: Joseph Schmidl Stone Environmental, Inc.

DERP-FUDS Property D01VT0363