

State of Vermont
Department of Environmental Conservation
Waste Management Division
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July 12, 2006

Paul Merrill Industries, Inc.
601A Danforth Street
Portland, ME 04102

RE: Site Management Activity Completed (SMAC) at the Former Merrill Transport Site
Bennington, Vermont (SMS Site # 93-1362)

Dear Mr. Merrill:

Based on review of the file for Site # 93-1362, the Sites Management Section (SMS) has the following understanding of the site:

- The site was previously assigned a Site Management Activity Completed (SMAC) designation on August 12, 1993. The site was assigned this designation at the time because the groundwater samples collected in April 1993 from the four onsite monitoring wells showed no target volatile organic compounds (VOCs) above detection limits. The four monitoring wells were installed in response to petroleum contamination that was found during the removal of underground storage tanks (USTs) in January 1993.
- In October 1998, Tewhey and Associates conducted a site investigation, which included the installation of two new monitoring wells, to determine if the sludge material in a drain pit had an adverse impact on soil and groundwater quality. Concentrations of 1,3,5-trimethylbenzene (TMB), and 1,2,4-TMB, and naphthalene were found above the Vermont Groundwater Enforcement Standards (VGES) in a groundwater sample from MW-1, which was located next to the drain pit. No contamination above the VGES was found in the hydraulically downgradient monitoring well, which was MW-2. In addition, no target VOCs were found in the onsite water supply.
- On November 6, 1998, the floor drain and drain pit were closed. The drain closure report and UIC registration were submitted to the Vermont Wastewater Management Division.
- In December 1998, groundwater samples were analyzed for VOCs, semi-VOCs, and metals. No metals were detected above the VGES. As in previous sampling results, only MW-1 had target VOCs above the VGES.
- On December 22, 1998, a concrete cap was placed over the former drain pit according to the Tewhey Associates plan dated December 11, 1998.

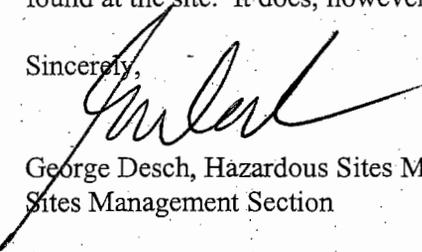
Over



- Regular sampling of the monitoring wells took place at the site from 1998 through November 2004. The last sampling round results were similar with the 1998 results. Monitoring well MW-1 has target VOCs above the VGES, but the other monitoring wells onsite did not detect VOCs above the VGES. The onsite water supply well and three offsite water supply wells were sampled and analyzed for target VOCs using EPA Method 524.2. All the water supply wells, except for the Luther Residence, was sampled in November 2004. The Luther residence well was not sampled until November 2005. No VOCs were detected above the VGES in any of the water supply wells.
- Four of the six monitoring wells were closed in accordance with Appendix A, Section 12.3.5 of the Vermont Water Supply Rule (April 25, 2005). Attempts were made using a metal detector to locate MW-93-2 and MW-93-4, but these monitoring wells could not be found. In 2004, these two monitoring well locations were paved over.
- A notice to land record was filed on May 18, 2006, documenting the presence of volatile organic compounds above the VGES in onsite groundwater. The SMS approved the notice of land record before it was filed at the Town Clerk's office.

Based on the above understanding of the site, the SMS believes that the residual contamination at the site from the hazardous material release does not pose an unreasonable risk to human health and safety or the environment. Therefore, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release current or past owners of any past or future liability associated with the contamination found at the site. It does, however, mean that the SMS is not requesting any additional work at this time.

Sincerely,



George Desch, Hazardous Sites Manager
Sites Management Section

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