



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
Natural Resources Conservation Council

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Hazardous Materials Management Division
103 South Main Street/West Building
Waterbury, Vermont 05671-0404
(802) 241-3888
fax (802) 244-5141

August 3, 1993

Mr. Richard Brochu
Brochu Citgo
Box 586
Hardwick, VT 05843

RE: Petroleum Contamination, Brochu's Citgo, Hardwick Village (site #92-1369 ~~93-0439~~)

Dear Mr. Brochu:

On April 14, 1993, the Vermont Department of Environmental Conservation, Sites Management Section (SMS) received and responded to a complaint of gasoline vapors in the Merchants Bank in Hardwick. Preliminary investigation into the impacts of petroleum in the village indicated that high vapor impacts were occurring in the Merchants Bank, lower levels of vapor impacts were occurring in the basement of the Hairport and Entertainment Unlimited Video building, and gasoline sheens were occurring in the Lamoille River at the stormwater drain located between your business and the Merchants Bank. Vapor problems were first noted inside the bank on April 5, 1993. By April 8, 1993, the vapors were so bad that Mary-Jane Fredette, the bank manager, called the environmental consulting firm of Aquatec, Inc. of Colchester, Vermont, to investigate the problem. The bank was closed on April 9 due to the severity of the vapor problem. Aquatec believed the problem to be fuel oil, and performed an indoor air analysis to confirm this belief. The results of the analysis indicated that the problem originated from gasoline, with vapor concentrations in the basement of the bank above the VOSHA standard for worker exposure to benzene.

The SMS checked all possible sources of petroleum contamination in the area of the Merchants Bank, but the source of the vapor problem could not be determined at that time. In response to this problem, the SMS hired the environmental consulting firm of Lincoln Applied Geology, Inc. (LAG) of Bristol, Vermont, to investigate the source of the petroleum vapors. Background investigation indicated that Exxon, then the owner of the station, had a large leak of gasoline from their underground storage system in 1975. This contamination was cleaned-up to 1975 standards. On November 12, 1989, five underground storage tanks were removed from the ground as part of a routine replacement of the fuel system. Groundwater and soil contamination was noted in the Hazardous Materials Management Division's inspector who was on site at the time of the removal.

In mid-1992, a leak of the super unleaded pump check valve was discovered and repaired at Brochu's Citgo. High photoionization (PID) levels were detected in the soils under the gasoline dispenser. On May 10, 1993, a representative of Champlain Oil Company arrived on-site to repair a minor gasoline drip from the gasoline filter in the regular unleaded pump. PID of the soils beneath the pump showed impacts of gasoline contamination.

TDD: 1-800-253-0191

Regional Offices - Barre/Essex Jct./Pittsford/N. Springfield/St. Johnsbury

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LAG submitted a preliminary summary letter report concerning impacts to the Merchants Bank and possible sources for this contamination on April 27, 1993 (see attached report). This letter indicated several possible sources for the impacts on the indoor air in the Merchants Bank and the Lamoille River. LAG recommended more work be performed in order to further investigate the source of this contamination. The SMS approved of LAG's work proposal on April 30, 1993. LAG performed additional investigations in May of 1993. This work included the installation of five monitoring wells and the drilling of numerous other soil borings. The results of this work indicated soils and groundwater between the Merchants Bank and Brochu's Citgo have been significantly impacted by petroleum contamination. Monitoring wells and soils borings drilled upgradient of Brochu's Citgo did not show significant impacts with petroleum contamination. The report went on to state that although the indoor air in the bank was not impacted at that time, that there remained a very good chance that it would again be impacted when seasonal groundwater conditions reappeared at high levels.

Based on all of this information, the SMS has determined that additional work is necessary at the site in order to determine the degree and extent of subsurface contamination. Therefore, the SMS is requesting that Richard Brochu, d.b.a. Brochu's Citgo retain the services of a qualified environmental consultant to perform the following work:

1. Completely define the degree and extent of subsurface petroleum contamination at the site, both in the groundwater and in the soils.
2. Continue with the assessment of potential and impacted receptors at the site.
3. Develop a plan to reduce the risk of adverse impacts on the indoor air in the Merchants Bank, the Hairport Building, and any other buildings in the area which may be impacted by petroleum vapors from this release. In addition to this, develop a plan to reduce the risk of adverse impacts on the Lamoille River.
4. Determine the need for a long term monitoring plan which addresses the contamination present at the site.
5. Submit to the SMS a plan that addresses the requested work in steps one through four above.

Please have your consultant submit a preliminary work plan and cost estimate within fifteen days of your receipt of this letter so that it may be approved prior to the initiation of on-site work. Enclosed, please find a list of consultants who perform this type of work as well as the brochure, "Selecting Your UST Cleanup Contractor", which will help you in choosing an environmental consultant.

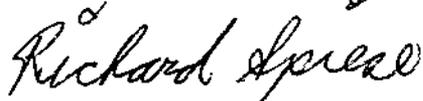
This work is covered under the State's Petroleum Cleanup Fund (PCF), assuming proof can be provided that no private insurance exists which will cover the costs of cleaning up this release. Therefore, all pre-approved work will be covered by the Fund, once you have met the required \$10,000.00 deductible. To date, the SMS has spent \$12,729.90 investigating this problem and mitigating its impacts on the bank. You may reimburse the State of Vermont the required \$10,000.00 deductible, or you may make payments on future work at the site until this deductible is met. At that time, the SMS will reimburse you for all future costs in relation to the investigation and remediation of this problem to the \$1,000,000.00 coverage allowable under the PCF. Please review the enclosed

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Reimbursement Policy, which outlines what expenditures are covered by the PCF.

If you have any questions pertaining to this matter, please feel free to call me at 241-3888.

Sincerely,

A handwritten signature in cursive script that reads "Richard Spiese". There are small marks above the 'i' and 'e' in "Spiese".

Richard Spiese, Site Coordinator
Sites Management Section

rfs/89311.1369

cc: Mary-Jane Fradette, Merchants Bank
Charles Safford, Hardwick Town Manager