



## State of Vermont

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Department of Fish and Wildlife  
Department of Forests, Parks and Recreation  
Department of Environmental Conservation  
State Geologist  
RELAY SERVICE FOR THE HEARING IMPAIRED  
1-800-253-0191 TDD>Voice  
1-800-253-0195 Voice>TDD

AGENCY OF NATURAL RESOURCES  
Department of Environmental Conservation  
WASTE MANAGEMENT DIVISION  
103 South Main Street / West Building  
Waterbury, Vermont 05671-0404  
(802) 241-3888  
FAX (802) 241-3296

April 20, 2004

DOUG GILMOUR  
GILMOUR FORD-CHRYSLER  
US Rt 5, PO Box 39  
ST. JOHNSBURY, VERMONT 05819

RE: Site Management Activity Completed, Gilmour Ford-Chrysler (former Wayne Ford-Chrysler)  
SMS Site #93-1459, St. Johnsbury, Vermont

Dear Mr. Gilmour:

The Sites Management Section (SMS) has reviewed the January 7, 2004 report titled, "*UST Closure and Soil Excavation Report, Gilmour Ford-Chrysler, Route 5, St. Johnsbury, Vermont*" prepared by The Verterre Group for work conducted on November 12, 2003 at your property. The SMS has also reviewed information contained in the site file. With this information, the SMS can now make the following conclusions:

- During the September 1993 closure of one 1,000 gallon gasoline and one 550 gallon waste oil underground storage tank (UST) contaminated soil was observed at the waste oil tank excavation. Volatile organic compounds (VOCs) were measured at up to 40 parts per million (ppm) by a photoionization detector (PID). The soil was observed to be sand backfill around the tank. Approximately 5 yd<sup>3</sup> of contaminated soils were stockpiled on site. Additional investigation was required by the SMS.
- As part of the September 1999 sale of the property, a Phase II Environmental Site Assessment describing the site investigation performed by Provan & Lorber in May 1994 was submitted to the SMS. According to this report, three groundwater monitor wells were installed and sampled in order to evaluate potential contamination related to the UST. No water level data, water flow direction, or quality control data (duplicate sample and trip blank) were collected. The samples were analyzed for VOCs via EPA Method 624. No target compounds were detected. The fate of the soil stockpile was not reported. Floor drains were reported in the service building. Additional investigation was required following evaluation of the Provan & Lorber report.
- On October 21, 1999 the three groundwater monitor wells and stained surface soils in a drum storage area (over an in service 1,000 gallon fuel oil UST) were sampled and analyzed for VOCs via EPA Method 8260 and total petroleum hydrocarbons (TPH) via 8015M. No VOCs were found

over

in the groundwater. TPH was found in the groundwater at 140 to 330  $\mu\text{g/L}$ , however this was also observed in the laboratory method blank and the groundwater results were attributed to lab contamination. PID readings in the soil samples ranged from 0.6 to 143 ppm; the 3 highest reading soils were combined and analyzed for VOCs and TPH. 1,3,5-trimethylbenzene (7,400  $\mu\text{g/kg}$ ), sec-butylbenzene (770  $\mu\text{g/kg}$ ), 4-isopropyl toluene (6,600  $\mu\text{g/kg}$ ), tetrachloroethene (3,300  $\mu\text{g/kg}$ ), and TPH (20,000 mg/kg as motor oil) were found.

- The floor drains were dye tested by the city sewer department and it was confirmed that they discharge to the sewer system. The soil stockpile was reportedly disposed of by Safety Kleen in 1993 or 1994, however no documentation of this exists.
- On April 25, 2000 five soil borings were advanced around the fuel oil UST and drum storage area; three were completed as monitor wells. Three soil samples and three groundwater samples were collected. No contamination was found in the soil and groundwater samples from SB-1/MW-101 and SB-5/MW-105. Toluene (190  $\mu\text{g/kg}$ ), xylene (131  $\mu\text{g/kg}$ ), 1,2,4-trimethylbenzene (14  $\mu\text{g/kg}$ ), and TPH (630  $\mu\text{g/kg}$  as paint thinner) were noted in SB-3. MTBE (8.0  $\mu\text{g/L}$ ) was found in MW-103. Confirmatory sampling was recommended and approved by the SMS. On April 11, 2001 MW-101 and -103 were sampled (the wellhead of MW-105 was submerged and not sampled). No contamination was found in these samples.
- On November 12, 2003 the fuel oil UST was replaced with a double wall UST. 75 tons of fuel and VOC contaminated soil were removed and disposed of at the ESMI facility in Loudon, New Hampshire. Five confirmatory soil samples were taken from the limits of the excavation. Traces of acetone, tetrachloroethene, toluene, and 1,3,5 trimethylbenzene were found in these samples. The levels observed were well below EPA Region III Risk Based Concentrations for residential soils and indicate that soil contamination remaining from this excavation is negligible.
- The nearest surface water, is the Passumpsic River, which borders the property. No other sensitive environmental receptors were identified. Based on the lack of contamination found in the groundwater monitor wells between the UST and drum storage areas and the river, it is not at risk by the site contamination observed.
- One of the site monitor wells was closed to eliminate it as a possible conduit for contaminant migration into the subsurface. This closure involved removal of the protective well cover, filling the wells with a grout material to prevent fluid migration in the borehole, and finishing to the surrounding grade. The remaining monitor wells could not be located since the area had been paved.
- The subject building and area are served by municipal water and sewer, which are not at risk of

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contamination from this site. Residual contamination in the soil and groundwater associated with the UST removal and drum storage area was shown to be confined to the subject property. No unacceptable risk to human health and the environment is present due to any residual contamination remaining in the ground from the removed UST and former drum storage area.

Based on the above, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release you, Mr. Gilmour, of any past or future liability associated with the volatile organic compound contamination onsite. It does, however, mean that the SMS is not requesting any additional work in response to the September 1993 UST closures and the November 2003 UST closure and soil removal from a drum storage area.

Please feel free to call with any questions.

Sincerely,



George Desch, P.E.

Chief, Sites Management Section

CC: Wayne Reganall, former owner  
Edward Zuccaro, Esq., Zuccaro, Willis & Bent  
St. Johnsbury Selectboard  
St. Johnsbury Health Officer  
DEC Regional Office (BY EMAIL)  
Deirdra Diehl, The Verterre Group, Inc. (BY EMAIL)