



## State of Vermont

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Department of Environmental Conservation  
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Department of Environmental Conservation

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January 28, 1997

SHARON ABBOTT  
JW SANDRI OF VERMONT  
PO BOX 760  
GREENFIELD MA 01302-0760

RE: Site Management Activity Completed, Kuhnel's Sunoco, Ludlow, Vermont  
(Site #94-1645)

Dear Ms. Abbott:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has reviewed your August 29, 1996 letter documenting the on-site thin spreading and seeding of approximately 40 cubic yards of contaminated soil at the above referenced site. The soils had been contaminated by the dumping and or spilling of hazardous materials including gasoline, ethylene glycol, and propylene glycol. Areas with stained soils were screened with a photoionization detector (PID), and measurements of volatile organic compounds were as high as 1,422 parts per million (ppm). The soils were excavated and polyencapsulated on August 8, 1995. Soil samples were collected from the pile for analysis of metals and volatile organic compounds using the Toxicity Characteristic Leaching Procedure. Approval to spread the soil was given by the SMS on July 12, 1996, since soils did not exhibit either the characteristic of toxicity, or elevated PID readings. While dismantling the soil pile, no soils samples contained PID readings in excess of 0.2 ppm.

Following the discovery of contamination during the removal of three gasoline underground storage tanks (USTs) in June 1994, additional soils were removed, and a subsurface investigation was conducted. All petroleum contaminated soil, approximately 18 cubic yards, was removed during the tank removals. This soil was subsequently treated by asphalt batching at MTS, Inc. in Epsom, New Hampshire. However, since contaminated soils were encountered in the vicinity of the groundwater table, the SMS requested that groundwater quality be evaluated. Initially, elevated concentrations (1,800 micrograms per liter) of methyl tertiary butyl ether (MTBE) were detected in one of the groundwater monitoring wells. Subsequent sampling demonstrated a progressive decrease in this contaminant. During the last round of sampling conducted in November 1995, MTBE was present at concentrations below the Vermont Health Advisory.

The site is served by municipal water, and no drinking water supplies are located in the area. The nearest potential environmental receptor is the Jewell Brook, which the SMS does not believe is at risk from the low concentrations of dissolved petroleum compounds. Based on the current conditions at this site, the SMS has determined that this site is now eligible for a SMAC (Site Management Activity Completed) designation. This means that the SMS has determined the following:

- the single-wall steel gasoline USTs have been removed from the ground, and are no longer a continuing source of petroleum contamination at this site;
- groundwater contamination was limited to the immediate vicinity of the former tank pit, and dissolved petroleum compounds are no longer present at concentrations above state groundwater standards;
- all petroleum contaminated soil at the site has been properly treated and disposed; and
- any residual contamination does not pose an unacceptable risk to human health or the environment.

Based on these findings, the SMS has determined that site management activities have been completed. The completion of these activities does not release J.W. Sandri of Vermont, Inc. of any past or future liability which may arise from the petroleum contamination discovered to have originated from gasoline USTs or disposal areas at the Kuhnel's Sunoco site. It does mean that the SMS is not requiring any additional work be performed in response to the contamination discovered at this site. If you have any questions or comments, please feel free to contact either me or Matt Moran at (802)-241-3888.

Sincerely,



George Desch, Chief  
Sites Management Section

cc: Ludlow Selectboard  
Ludlow Health Officer  
DEC Regional Office  
Paul Miller, ERD Environmental, Inc.