

State of Vermont
Department of Environmental Conservation
Waste Management Division
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AGENCY OF NATURAL RESOURCES

May 19, 2008

Mr. Andrew Shively
VTrans Operations Division
1 National Life Drive
Montpelier, VT 05633

RE: Site Management Activity Completed Designation, LaCroix Property (former District #2 Maintenance Garage)
U.S. Route 5, Brattleboro, Vermont (Site #94-1692)

Dear Mr. Shively:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has had the opportunity to review this site for a Site Management Activity Completed (SMAC) designation. Given this review, a SMAC designation is appropriate as described below.

In 1989, Mr. Michael Lacroix purchased the District #2 Maintenance Garage. At the time of the sale, VTrans had cleaned up visible surface contamination and removed seven abandoned underground storage tanks. The SMS opened this site in October 1994, after reviewing a Phase II Environmental Site Assessment performed by The Johnson Company. The Merchant's Bank initiated the assessment in response to their acquisition of another bank that was a mortgager for the property. Though there were several potential areas of concern, the advancement of 14 soil borings and installation of four monitoring wells only indicated one significant finding, the presence of tetrachloroethylene (PCE) above the "Enforcement Standard" of the "Vermont Groundwater Protection Rule and Strategy." Due to prior contractual agreement, VTrans undertook retaining an environmental consultant to further investigate. They hired Nelson, Heindel and Noyes (NH&N), who installed seven additional groundwater monitoring wells in July 1996. Five of the eleven monitoring wells contained chlorinated solvents, with violations of the PCE enforcement standard in each.

In August 1996, NH&N identified evidence of onsite surface disposal of petroleum and paint products, and flagged concerns about floor drains remaining open. Michael Lacroix retained Environmental Compliance Services (ECS) to investigate these disposal practices, and had the floor drains sealed and grouted. In October 1997, ECS advanced eight shallow soil borings, screened 16 soil samples using a photoionization detector, and collected two composite soil samples for analysis of volatile organic compounds. There were no findings evidencing significant contamination and no further work was requested.

Concentrations of PCE and other chlorinated hydrocarbon breakdown products steadily declined over the 11 groundwater sampling rounds conducted between July 1994 and October 2005. The data obtained from the October 2005 event indicated that compliance with enforcement standards had been attained site-wide. In July 2006, Heindel and Noyes decommissioned remaining monitoring wells yet to be closed.

(Over)



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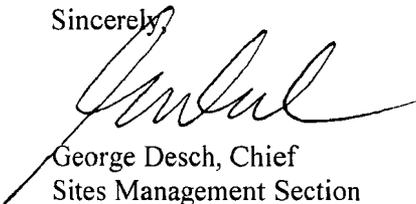
The only potential sensitive receptor identified by both The Johnson Company and NH&N was the West River. No evidence of impact to the river was ever observed and the downgradient groundwater monitoring wells at the top of the river bank never contained evidence of contamination. The area is served by municipal drinking water.

Based on the above, the SMS has determined that this site is eligible for a SMAC designation. The following conclusions have been made by the SMS:

- there is no longer an ongoing environmental contaminant source for PCE and other volatile organic compounds given the sealing of all floor drains, and the improvement in waste disposal practices;
- all monitoring wells attained compliance with enforcement standards through monitored natural attenuation over an eleven year period;
- all groundwater monitoring wells have been properly closed to ensure that they cannot serve as a potential conduit between surface releases and groundwater;
- any residual soil and groundwater solvent contamination is limited to the area between former MW-16 and downgradient wells MW-17, MW-18 and MW-19, and will be naturally attenuated over time; and
- any residual contamination does not pose an unacceptable risk to human health or to the environment.

Based on the above, the solvent contamination no longer poses an unreasonable risk to human health and safety or to the environment. Therefore, the SMS is assigning this site a SMAC designation. This designation does not release VTrans or Michael Lacroix of any past or future liability associated with any residual solvent contamination originating from the Lacroix property. It does, however, mean that the SMS is not requesting any additional work at this time. 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: Michael Lacroix
Brattleboro Selectboard
Brattleboro Health Officer
DEC Regional Office ✓
Steve LaRosa, H&N ✓