

January 3, 1995

JAN 10 1 29 PM '95

HAZARDOUS WASTE  
PERMIT NO. 123456789

Ms. Sue Thayer  
Vermont Department of Environmental Conservation  
103 South Main Street  
Waterbury, VT 05671

Re: New Country Bennington Auto Park Honda Dealership  
Underground Storage Tank Pull

Dear Ms. Thayer:

Please find enclosed the underground storage tank (UST) pull information, regarding the New Country Auto Park located in Bennington, Vermont, which you requested during our December 15, 1994 telephone conversation. A summary of UST removal activities is included along with the Vermont Department of Environmental Conservation UST form.

If you have any questions, please feel free to contact myself or Eric Holt at your convenience.

Very truly yours,  
Environmental Hydrogeology Corporation

*Stephanie Milvo*  
Stephanie Milvo  
Geologist

SM/sm/thayer

MATT

Enc.

cc: M. Cantanucci

HERE IS THE WRITTEN REPORT  
TO GO WITH THE PULL FORMS  
FOR NEW COUNTRY HONDA  
I REFERRED THIS TO SMS  
(THRU JM) IN DEC 94

SUB

ROUTE 146, CLIFTON PARK, NEW YORK 12065  
28 MADISON STREET, RUTLAND, VERMONT 05701

(518) 371-7940  
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EHG environmental hydrogeology corp.

## 5.0 ADDITIONAL RELATED WORK

### 5.1 Underground Storage Tank (UST) Removal

A 1,000 gallon UST was removed from active service on November 7, 1994 by removing approximately 1,000 gallons of # 2 heating oil by Agway Petroleum, which was later pumped into two newly installed 275 gallon above ground heating oil storage tanks located within the buildings service area. The remaining product was returned to Agway for credit and use at a later date. Until removal from service, the tank has been in continuous use since purchase of the dealership by New Country Motor Car Group and was in current compliance with State of Vermont UST storage procedures. There was no known or reported loss of product during New Country's ownership.

The removal of the UST was performed by Kleen Resources, of Clarksville, New York on November 8, 1994 under the observation of Stephanie Milvo and Eric Holt of Environmental Hydrogeology Corporation. The tank was in excellent condition with no holes or perforations observed upon removal.

No information was available prior to removal of the UST regarding age or condition, however, upon removal it was observed that the UST was a single walled steel shell meeting STiP 3 tank criteria with cathodic protection. The UST was equipped with a sacrificial anode which had sacrificed approximately 90% of the original anode material. There were no signs of corrosion on the tank, including areas which contained scuff marks and nicks through the original tank exterior coating to bare steel. Due to the lack of any signs of corrosion, it is apparent the sacrificial anode had been performing as designed.

Two locations of fuel leakage were observed during excavation activities. The first was at the threaded portion of the vent pipe where it enters the tank. This was observed to have been threaded only hand tight during installation and was not fully sealed. The second location, and most prevalent point of leakage noted, was at the copper supply line connection to the tank for delivery of oil to the dealership's hot water boilers. Apparently, the through tank fittings were threaded on hand tight, which resulted in a small amount of leakage each time the product was pumped into the building.

The soil removed from the excavation consisted of granular (sand and gravel) backfill material and was thoroughly scanned by a HNu photoionization detector (PID) for detection of possible contaminated material. Soil contamination was noted on the supply end of the tank with PID readings of 100 parts per million (ppm) or less. The contamination was noted mainly on the sides, bottom and in

the immediate vicinity of the supply fittings. All contaminated soil was separated from clean materials and was placed on six mil polyethylene in the north corner of the paved parking areas for disposal at a later date.

The Vermont State Department of Environmental Conservation was notified upon observation of contamination. The Vermont representative was unavailable for an on-site inspection, but was advised that the proper procedures for closure and backfill would be performed. The representative approved the continuation of field activities without his presence.

Approximately 8-10 cubic yards of contaminated soil with PID readings of 20 ppm - 100 ppm were removed and, as previously mentioned, stock piled on site. No contaminated soil with a PID reading greater than 20ppm remained in the excavation, with the exception of a peak reading of 30 ppm on the southwest wall which was situated approximately 12.0 feet from the dealership building. Additional excavation activities at that wall were not performed due to the possible detrimental effect on the structural integrity of the building and septic system pipes located at the edge of the excavation wall, running parallel to the building.

At the completion of excavation activities, the pit was lined with polyethylene and back filled with clean material from Burgess Fill and Gravel of Bennington, Vermont and previously excavated soil with a PID reading of <1.0 ppm. The excavation was backfilled to grade and capped with a new asphalt surface on November 23, 1994.

The Vermont State Department of Environmental Conservation (VSDEC) was contacted upon completion of excavation, backfilling and stockpiling activities with regards to further action needed on-site. EHC was informed by Mr. Mark Coleman, a VSDEC representative, that no sampling for analytical laboratory results is necessary, only PID concentration readings. However, Mr. Coleman informed EHC that VSDEC Tank Pull Forms would need to be completed, signed and returned to the VSDEC. The corresponding forms were completed on December 2, 1994 by EHC and forwarded to Mr. Chris Spofford, of New Country Bennington Auto Park, to be signed by him and then forwarded to Mr. Coleman.

On-site treatment and disposal is possible for the stockpiled soil. Once the soil is treated, no further action is required by Vermont State Department of Environmental Conservation.