



State of Vermont

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AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation

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December 2, 1996

RICHARD FLEMING
FLEMING OIL COMPANY
ONE PUTNEY ROAD
BRATTLEBORO VERMONT 05301

RE: Site Management Activity Completed, Fleming Texaco-Western Avenue,
Brattleboro, Vermont (Site #95-1832)

Dear Mr. Fleming:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has reviewed the ERD Environmental, Inc. November 14, 1996 report titled, "Additional Site Investigation Report" for the above referenced site. This investigative work was conducted in response to the petroleum contamination encountered during the replacement of underground storage tank (UST) system connective piping during the week of May 2, 1995. Since the full extent of contamination was unknown, all excavated soil was backfilled during the piping replacement. In order to determine the degree and extent of contamination, nine groundwater monitoring wells were installed. During the advancement of the soil boring FT-3, peak volatile organic compound (VOC) concentrations of 1,411 parts per million were measured with a photoionization detector (PID).

Laboratory analysis of groundwater samples collected from the monitoring wells on September 11, 1995, indicated the presence of 990 parts per billion (ppb) 1,3,5-trimethylbenzene (TMB) and 2,000 ppb 1,2,4-TMB, exceeding the respective Vermont Health Advisory concentrations of 4.0 ppb and 5.0 ppb. Additionally, FT-5 contained 8.5 ppb benzene, exceeding the Vermont Groundwater Enforcement Standard of 5.0 ppb. At the time of the September 11 monitoring event, no downgradient monitoring wells from FT-3 or FT-5 were available for sampling. Subsequent groundwater sampling at FT-5 on June 12, 1996 and October 10, 1996 did not indicate the presence of benzene. Although TMBs were not quantified in the analysis of samples collected on June 12, 1996, the analysis of the groundwater sample collected from FT-3 on October 10, 1996 indicated the presence of 100 ppb 1,3,5-TMB and 220 ppb 1,2,4-TMB; a decrease in VOC concentrations of 90% and 89% respectively. A groundwater sample collected from FT-4, on October 10, 1996, contained only 1.1 ppb 1,3,5-TMB. FT-4 is located within the property boundaries and is downgradient from FT-3. In addition, FT-7, located between Whetstone Brook and FT-4, did not contain any evidence of petroleum contamination.

The most proximal residence, located southwest of the property, was screened with a PID and no VOCs were detected. No visual evidence of contamination was observed on the Whetstone Brook and no groundwater seeps were detected downgradient of the site.

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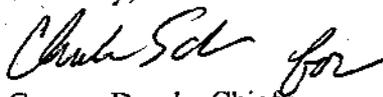
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Based on the current conditions at this site, the SMS has determined that this site is now eligible for a SMAC (Site Management Activity Completed) designation. This means that the SMS has determined the following:

- the UST connective piping has been removed from the ground, and is no longer a potential source of petroleum contamination at this site;
- although groundwater collected from FT-3 still contains TMBs exceeding Vermont Health Advisory levels, the concentrations in this well have been decreasing, and there is a compliance point (FT-4) located downgradient from this well;
- any residual petroleum contaminated soil does not pose a risk of significant contaminant transfer to groundwater, and the asphalt pavement covering the site minimizes the risk of direct human exposure; 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 Fleming Oil Company of any past or future liability which may arise from the petroleum contamination discovered to have originated from the UST piping at the Fleming Texaco-Western Avenue 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: Brattleboro Selectboard
Brattleboro Health Officer
DEC Regional Office
Nancy Hagstrom, ERD Environmental, Inc.