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August 28, 1995

Mr. Steven Smith, Esquire
Cain, Hibbard, Myers and Cook
66 West Street
Pittsfield, MA 01201

Reference: Eagle Street Realty Trust
Paper Storage Area Investigation
Bennington Banner Building
425 Main Street, Bennington, Vermont

Dear Mr. Smith:

We are writing to summarize site conditions encountered and field activities undertaken in accordance with the signed letter proposals dated 11 July and 28 July 1995.

Field activities, conducted by Maxymillian Technologies, Inc. (MT), took place between 12 July and 24 August 1995.

Background

Initial site investigations conducted in the spring of 1995 by Environmental Services of America, Inc. (ENSA), for the potential buyer identified the possible existence of an abandoned in place 500-gallon #2 fuel oil storage tank. The tank was reported to be located below the concrete floor slab of the Bennington Banner building paper storage room. Information provided by Eagle Street Realty Trust (ESRT) to ENSA further indicated that the tank, reportedly installed in 1960, was decommissioned (filled with sand) in 1990. No apparent tank leakage or signs of visible contamination were reported to be present in the soils immediately surrounding the tank, at the time of decommissioning.

As part of ENSA's field activities, a soil vapor probe was driven into the soils adjacent to the suspected tank location. Photoionization Detector (PID) readings increased with depth from approximately 30 parts per million (ppm) Volatile Organic Compounds (VOCs) at three-feet below grade to approximately 170 ppm VOCs at eight-feet below grade.

Based on a review of the Vermont Underground Storage Tank Regulations, a suspected release had occurred on-site. Notification of this release was provided by Mr. William Roberts of Cain, Hibbard, Myers and Cook (attorney for the property owned by ESRT),

Given the time of day (3:15 p.m.), further excavation was curtailed to allow for site clean-up.

On 13 July 1995 representatives of MT, in the company of Mr. David Balk of ENSA, returned to the site to continue subsurface soil investigations.

Field activities began with the removal of concrete rubble from Area B and the previous day's rubble, remaining in the building, to facilitate movement of equipment inside the area.

The excavation in Area B was extended to approximately two feet below grade and the surrounding area probed for the presence of a storage tank. No apparent evidence of a tank was identified.

In an effort to determine if the contamination first identified by ENSA also existed at depths in this area, the opening in the concrete floor slab was enlarged to approximately four-feet by six-feet. The excavation was then extended to approximately 7.3 feet below grade. Sidewall caving allowed for further visual evaluation of conditions below the floor slab surrounding the opening. No storage tank was encountered.

During excavation, soil samples were collected from the base of the excavation and screened using a Hnu Photoionization Detector (PID). The following readings in parts per million (ppm) were recorded:

Depth	HNU (ppm)
3	1.0
6	0.5
7.3	0.0

Given the encountered conditions, the excavation was backfilled.

At this point in time a decision was made by MT representatives to return to the first area of excavation and, by excavating down to and into the area of contamination identified by ENSA, attempt to trace the contamination back to the storage tank (if still present), removing the contaminated soils in the process.

Upon returning to the original area of excavation (Area A), the opening in the concrete slab was enlarged in an easterly direction approximately four-feet to allow excavation at depth with the Bobcat's backhoe shovel.

on 6 July 1995 to Mr. Mark Coleman of the Vermont Department of Environmental Conservation (VT DEC).

MT was retained by ESRT to remove the decommissioned storage tank.

Field Activities

A. Initial Site Investigations - 12 to 24 July 1995

On 12 July 1995, MT began site investigations in the paper storage area. Mr. Paul Renouf of ENSA was on-site to observe and document site activities and field conditions for the potential buyer of the property.

Prior to excavation activities on-site, polyethylene sheeting was taped over the northerly and southerly entry points of the work area to limit Bennington Banner (BB) employee access and to lessen dust migration to other areas of the building. Insulating blankets were also placed over the manway door to the office area in an effort to reduce noise migration.

The general consensus of the BB management was that the tank was located within the immediate area of ENSA's probe installation. For this reason exploration for the tank began at Area A, illustrated on Figure 1.

A four-foot by four-foot square of the eight-inch thick, rebar reinforced concrete floor was broken-out using a hi-ram attachment on a Bobcat backhoe. Concrete demolition material was segregated for later disposal at Burgess Brothers Demolition Landfill, Bennington VT. The excavation was advanced to approximately 3.5-feet below slab grade. It should be noted that during excavation a slight solvent-like odor was noted in the soils within the excavation. Soil samples possessing this odor were collected and screened using the PID. No readings above background (0 to 10 ppm) were recorded.

Soils encountered within the excavation consisted of dry, tan brown, inter-mixed fine to medium sand and cobbles, some scrape metal, bricks, broken pottery and ash. Staining, sheen and/or free product was not encountered. Ground water was not encountered.

No apparent visible sign of the decommissioned tank was noted. Probing out and down from the excavation side walls and bottom with a five-foot length of steel rod also did not indicate the presence of a tank.

Further conversations with long time BB employees indicated that the tank was actually located more towards the center of the work area (See Figure 1, Area B).

Based on this information, the first area was backfilled to allow access to the new site and a second four-foot by four-foot section of concrete flooring (Area 2) was broken up.

During the course of this excavation the solvent type odor, noted on 12 July 1995, was again encountered. Soil samples collected during excavation were screened with the PID. The following VOC concentrations were recorded in parts per million (ppm):

Depth	INS (ppm)
3	5.0
5	45.0
6.5	12.0

During excavation short lengths of copper tubing (possibly fuel supply line material) were encountered. At this point in time the supply line stub ends which pass through the basement wall were pushed from the basement back into the excavation in an attempt to locate the lines. One line was found to be cut off just outside of the basement wall. The other line passed through the wall, turned and ran parallel to the wall towards the west and receiving bay doors. Insufficient excavation had been completed by this time to determine the terminus of the copper line.

Given the elevated PID reading (45 ppm) encountered at five-feet below grade, one soil sample was collected for submittal to the laboratory for analysis according to EPA Test Method 8240. Laboratory results (dated 17 July 1995) are presented as part of Appendix A.

A MT representative met with Bennington Banner management, Eagle Street Realty Trust Representatives and telephoned Mr. William Roberts to discuss site conditions. A call was then placed to Mr. Mark Coleman to advise him of encountered site conditions. As Mr. Coleman was not available, the MT representative spoke with Mr. Ted Unkles (Mr. Coleman's supervisor) and summarized site activities to date. The intent of this call was to obtain verbal approval for excavation and stockpiling of materials possessing contaminant concentrations greater than ten ppm, as indicated by PID screening.

Mr. Unkles requested that, before further work be undertaken on-site, a work plan be submitted to the VT DEC for review and approval. Mr. Unkles explained that this work plan approval was necessary should ESRT decide to pursue reimbursement through the Vermont Underground Storage Tank Reimbursement Program.

Following additional conversations with ESRT representatives and Mr. Roberts, further on-site investigation was curtailed until completion and approval of a site work plan. MT's crew utilized the remainder of the day to clean up the job-site and establish site security. Four cubic yards of concrete rubble were disposed of at Burgess Brother Landfill.

A copy of the work plan submitted to Mr. Unkles and the VT DEC letter of response dated 18 July 1995 is presented as Appendix B.

Further conversations with Mr. Richard Spiese of the VT DEC regarding the reimbursement program provided the following information:

- Should this investigation indicate that a release has occurred on-site which requires corrective action, a corrective action plan would need to be prepared. Corrective action is only necessary whenever and wherever a site exhibits free product or a sensitive receptor is directly affected or at risk. The corrective action plan would be submitted to the VT DEC for review and approval prior to work on-site.
- VT DEC approval of this plan is necessary if a claim for reimbursement by the Vermont Petroleum Cleanup Fund (VPCF) is sought.

As of 13 July 1995 work conducted on-site to date did not indicate the need for corrective action.

On 19 July 1995 MT returned to the site to continue exploration for the tank. At approximately 9:30 a.m. the tank was located. The ENSA boring appeared to have just brushed the westerly end wall of the tank. Figure 2 illustrates the tank location. The top of the tank, exposed at approximately 12:00 p.m., was located approximately three feet below slab grade. Fill, vent and fuel feed lines were disconnected.

Upon inspection, the 500-gallon tank was found not to be "decommissioned" (using a sand fill); but rather, was found to contain approximately six-inches (approximately 45-gallons) of free product.

One sample of the tank contents was submitted to MT's Analytical Services Division for analysis according to EPA Test Method 8240 (Volatile Organic Compounds [VOCs]). Laboratory results (dated 10 July 1995) are presented as part of Appendix A. Conversations with MT's laboratory director indicated that the liquid consisted of a mixture of gasoline and #2 heating oil, with a lesser fraction of Acetone and Methylene Chloride. The Acetone and Methylene Chloride do not appear on the laboratory report due to the dilution factor used.

During excavation of the tank soil, samples were collected and screened using a PID. The following readings were recorded. The results are presented in ppm.

Sample Location	Depth (Feet Below Slab Grade)	HNU Reading (ppm)
Top of Tank	3	3
West End of Tank	4	9
East End of Tank	4	22.0
Below Fill Vent	3	1.2
No. Side of Wall of Tank	4	40.0
Southeast Corner of Tank	4	29.0
East End of Tank	5	45.0
West End of Tank	5	5.0
West End of Tank	6	14.0
NE Corner of Tank by Basement Wall	6	70.0

On 20 July 1995 the fill and vent lines were cut off inside of the paper storage area westerly frost wall and the piping stubs plugged at the wall using expansion plugs. Product supply lines were cut off outside and inside of the basement wall and filled with concrete.

The product was transferred via a diaphragm pump to one 55-gallon drum for later disposal. The ports were fitted with screw plugs. The tank was purged with nitrogen and transported to Mass Tank in Chicopee, MA for disposal.

The tank, which measured approximately four-feet in diameter by five-feet in length, was removed from the excavation at approximately 10:40 a.m. The tank (#826134, MH 5601) was found to be rusted and pitted over its entire surface area. Four holes approximately 1/4-inch in diameter were visible along the lower left 1/4 of the tank's easterly end wall. One hole (1/4-inch diameter) was noted within the upper left 1/4 of the tank's easterly end wall. One additional hole was identified at the bottom center of the tank. No additional holes were noted.

Those soils exhibiting VOC levels of greater than ten ppm, as indicated by the PID, were excavated from the tank grave and stockpiled on-site for later disposal. The excavation directly below the tank grave was first extended to a depth of approximately 9.5 feet below grade (in full reach of Bobcat bucket) in an attempt to determine the vertical extent of contamination. At this depth, the bottom of the excavation was located approximately

1.5-feet below the grade of the front office's basement footing. A soil sample was collected from the bottom of the excavation and screened using the PID. A reading of 45 ppm was noted. The sample was retained for laboratory analysis to determine TPH and VOC concentrations. Laboratory results are presented as part of Appendix A and summarized below. The contaminant concentrations are presented in ppm:

Parameter	Concentration (ppm)
Benzene	2.09
Toluene	1.07
Total Xylene	6.63
Total Petroleum Hydrocarbon	27,400

Approximately eight to ten cubic yards of material were excavated during the course of this portion of the investigation and stockpiled on-site (adjacent to the receiving bay doors on polyethylene sheeting and covered with the same) for later disposal. A sample of the stockpiled material was collected on 9 August 1995 and submitted to the laboratory for Disposal Characterization. Laboratory results (14 August 1995) are presented as part of Appendix A.

On 24 July 1995 a site meeting was held with representatives of MT, ESRT and you to discuss site conditions and a potential scenario for further work. Mr. Richard Spiese of the VT DEC was also contacted and invited to attend the site meeting. However, Mr. Spiese indicated that he would be unable to attend.

B. Subsurface Investigations - 25 July to 24 August 1995

On 25 July 1995 MT again contacted Mr. Spiese to discuss site conditions. Conversations with Mr. Spiese provided the following information:

- VT DEC, in general, does not view the excavation of contaminated soil to be a viable option. In this particular case Mr. Spiese suggested that no further excavation of contaminated materials should be undertaken. It was also our opinion that, due to physical site conditions, additional excavation of contaminated material from within the building would not be a cost effective method of remediation. Further excavation at depth, could also adversely effect the structural integrity of the building.

- VT DEC would require information regarding:
 - a) indoor air quality impacts (if any)
 - b) potential for VOC soil gas buildup below the floor slab of the paper storage area
 - c) ground water quality impacts (if any)

Should these investigations indicate that a release had occurred on-site which required corrective action, a corrective action plan would have to be prepared. Corrective action is only necessary whenever and wherever a site exhibits free product or a sensitive receptor is directly affected or at risk. A corrective action plan would have to be submitted to the VT DEC for review and approval prior to work on-site.

Our proposal of 28 July 1995 was based on the information as provided by Mr. Spiese.

On 4 August 1995 representatives of MT were on-site to install a soil vapor monitoring point and riser pipe within the paper storage area.

Site activities were coordinated with the contractor retained by the Bennington Banner to backfill the excavation and repair the concrete floor.

Conversations with the contractor indicated that he intended to excavate the disturbed areas and backfill with stone in order to provide a good base for the new floor. The contractor requested a certification stating that the material to be excavated was "clean". This certification could not be provided due to lack of laboratory analysis. As physical site conditions precluded stockpiling of excavated material, arrangements were made by MT to transport the material off-site to MT's En-Cap Facility, 1801 East Street, Pittsfield, MA for temporary storage pending laboratory analysis. Should laboratory analysis indicate no contaminant concentrations, the material would be disposed of as construction debris. Should contamination be present, the material would be treated/disposed of via asphalt encapsulation. Approximately 15 cubic yards of material were transported to MT En-Cap Facility via a Material Shipping Record and Log (MSR&L). A copy of the MSR&L is presented as Appendix C. Laboratory results dated 16 August 1995 indicate the presence of TPH within the collected sample at 3,090 ppm. As such the material could not be disposed of as construction debris and so was treated/disposed of via asphalt encapsulation.

Prior to backfilling (with 3/4-inch diameter gravel) and repouring/repair of the concrete floor, a vapor monitoring point and riser section were positioned in the open excavation. The vapor monitoring point was constructed of a five-foot length of four-inch diameter PVC, 0.010 slot well screen and a length of four-inch diameter PVC riser to bring the

* Footnote: Mr. Spiese indicated that VT DEC approval of this plan is necessary if a claim for reimbursement by the Vermont Petroleum Cleanup fund (VPCF) is sought.

installation to within approximately two-inches of grade. A bottom plug and locking water tight cap finished the installation. A six-inch diameter road box was positioned to bring the installation to grade and secured in place by the concrete poured for the new floor.

Immediately adjacent to the monitoring point, a vertical section of four-inch diameter solid PVC riser was installed in a similar manner. However, a bottom plug was not installed as the intent of the installation was to allow for the advancement of a boring from the base of the excavation (approximately 8.0 feet below slab grade) to a depth of at least ten-feet below the first encountered apparent ground water level. A subsequent ground water sample would be collected.

Figure 2 illustrates the relative position of the soil vapor monitoring point and boring riser.

On 9 August 1995 the boring installation was attempted using a tripod rig. Refusal was encountered within the first one-foot interval of sampling (at 8.6-feet below slab grade) using a three-inch diameter split-spoon. A second attempt was made using a two-inch diameter split spoon - the intent being to pass by the obstruction. However, refusal was again encountered.

A field boring log is presented as Appendix D.

One soil sample, collected from 8.0 to 8.6 feet below grade was collected and submitted to the laboratory for analysis according to EPA Test Method 8240 and Modified EPA Test method 8100. The reported TPH concentration was 34,900 ppm.

One 9 August 1995 one composite soil sample was also collected from the material stockpiled on-site for disposal.

Disposal Characterization entailed the following analysis:

- Test Method 1010 (Flashpoint)
- SW-846 (Reactivity)
- Test Method 8081 (PCBs)
- Test Method 9045 (pH)
- Test Method 6010A (Metals)
- Test Method 8100M (TPH)
- Test Method 8240(A) (VOCs)

Laboratory results (14 August 1995) are presented as part of Appendix A.

The stockpiled materials were transported to and disposed of at MT's En•Cap Facility via a MSR&L on 18 August 1995. A copy of the MSR&L is presented as part of Appendix C.

On 23 August 1995 MT returned to the site to install one ground water monitoring well on-site. Figure 1 illustrates the monitoring well locations.

The goal of the investigation was to characterize on-site ground water quality and to identify possible ground water impacts to the site as a result of the apparent tank release. The following describes the elements of the soil borings and monitoring well installation.

Digsafe clearance was obtained and site personnel were interviewed to establish the locations of underground utilities, minimizing the potential of encountering underground utilities during advancement of the boring installation.

The soil boring was initiated using 4 1/4-inch I.D. hollow stem augers to evaluate the vertical extent of the permeable fill and confining silt/clay units. However, refusal was encountered at approximately four-feet below grade, and as such, air rotary drilling techniques were employed.

Attempts at split-spoon soil sampling were conducted according to methods outlined in ASTM-D-1586-67 at five-foot intervals. Refusal precluded collection of a soil sample within the upper 15-feet of the boring installation. A boring log is presented as Appendix D.

One soil sample was collected from the silt/clay unit at a depth of 15 to 17-feet below grade. The sample was screened for total ionizable volatile organic vapors using a PID. The soil boring was advanced to approximately ten-feet below the first encountered zone of saturation (i.e., water table).

Following completion of the test boring, attempts were made to install a two-inch diameter PVC monitoring well (flush joint connections). However, caving of the lower portion of the bore hole prevented installation. On 24 August 1995 a four-inch diameter spun casing was advanced to 10-feet below grade to prevent further bore hole caving and facilitate well placement. The well was installed with approximately ten-feet of 0.10-inch slotted PVC screen below the water table and five-feet of screen above the water table. Solid PVC riser pipe was added to bring the well to grade. The annular space between the PVC and the boring was filled with #2 silica sand, one to two-feet above the top of the screened section. A bentonite seal was then installed and the remainder of the boring backfilled with field-screened auger cuttings. A locking, watertight cover was installed on the riser pipe and a protective road box was cemented into place to protect the installation. Monitoring Well Construction Details are presented as Appendix E.

Following installation, the well was developed using compressed air, followed by bailing using a pre-cleaned disposable bailer. The well was developed until the evacuated liquid was relatively sediment free.

Typically, ground water monitoring wells are allowed to stabilize for at least 72-hours prior to sampling. However, given the scheduled realty closing date of 29 August 1995, the well was sampled the same day as development. A ground water sampling log is presented as Appendix F.

Prior to sampling, the well was evacuated three times its volume using a disposable bailer. The water sample was transferred to an appropriate laboratory container and packed on ice for shipment. The ground water sample was submitted to Alpha Analytical Laboratories, Inc. of Westborough, MA. The sample was analyzed according to EPA Test Method 8260 (VOCs) and EPA Test Method 8100 (TPH).

The results of the laboratory analyses are presented as part of Appendix A.

Laboratory results indicate no detectable concentrations of analytes.

C. Indoor/Outdoor Air Monitoring

On 14 August 1995, a representative of The Scott Lawson Group, Ltd. ([SLG] Environmental, Health and Safety Consultants retained by MT) was on-site to conduct indoor and outdoor air monitoring. Field activities consisted of the collection of three samples from within the basement, three samples within the office, two samples within the storage area, one sample outside of the building and the collection of one Analytical Field Blank as a control.

A copy of the SLG Laboratory Report is presented as Appendix G. The report indicates that the level of Xylene in the press room/storage area exceed ambient air guidelines/standards.

On 23 August 1995 the oil vapor monitoring well was opened and screened for volatile organic vapor concentrations using an HNU Photoionization Detector equipped with an 11.7 ev lamp. A reading of 0.0 ppm was recorded.

Conclusions and Recommendations

Field activities and laboratory analysis indicate no apparent impact to ground water quality on-site as a result of the release from the abandoned (now-removed) underground storage tank.

Photoionization Detector Screening at the vapor monitoring point indicate no apparent concentrations of VOC below the floor slab.

The complete SLG Air Monitoring Report was not available at issue of this letter report. However, a review of SLG Laboratory Reports indicate the presence of Xylenes, at a level which exceed Ambient Air Quality Guidelines/Standards.

Conversations with Mr. Scott Lawson suggests that the presence of this compound, given the PID screening results, may not be related to the conditions below the floor slab or abandoned tank removal, but rather to the paper's production activities. Mr. Lawson suggested that a second round of air quality sampling be conducted to determine if the Xylene concentrations are increasing, constant or degrading. Mr. Lawson also suggested that a review of the paper's Material Safety Data Sheets be conducted to determine if the presence of the identified compounds can be attributed to the paper's production activities.

Should you have any questions, please do not hesitate to contact me.

Very truly yours,

MAXYMILLIAN TECHNOLOGIES, INC.

Robert F. MacLean, js

Robert F. MacLean
Licensed Site Professional

Enclosures

cc: File
Steve Smith, Cain, Hibbard, Myers & Cook
Jason Finegold, VT DEC
Mary Van Cleve, Verner, Lipfert, Bernhard, McPherson & Hand

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FAX COVER SHEET

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Number of Pages: 3
Including Cover Sheet

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August 28, 1995

VIA TELECOPIER
802-241-3296

Jason Feingold
Vermont Department of
Environmental Conservation
Hazardous Materials Management Division
103 South Main Street - West Building
Waterbury, VT 05671-0404

Re: Eagle Street Realty Trust Properties in
Bennington, Vermont

Dear Mr. Feingold:

Maxymillian Technologies will be delivering to you by Federal Express tonight two reports related to properties at 530 East Road, Bennington, Vermont and 425 Main Street, Bennington, Vermont.

A. 530 East Road, Bennington.

In the July 18, 1995 report prepared by ENSA Environmental, Inc. related to 530 East Road, Bennington, Vermont, ENSA reports a finding of 1.5 ppb of PCE in the groundwater of monitoring well ER-3 located in the northeast corner of the site. In order to provide additional information, Maxymillian Technologies resampled the same well on August 24, 1995. The Maxymillian Technologies report dated August 28, 1995 indicates non-deductible concentrations of compounds in the resampling.

If this data is sufficient, we would appreciate confirmation of non-site status for 530 East Road. If the Vermont DEC would like any further action taken in regard to this site, please let me know.

B. 425 Main Street, Bennington.

Regarding 425 Main Street, Bennington, Maxymillian Technologies is forwarding to you a report dated August 28, 1995 describing the removal of the underground storage tank beneath the floor of the Bennington Banner

CAIN, HIBBARD, MYERS & COOK

August 28, 1995
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warehouse annex and the subsequent investigation of air quality and groundwater. This report indicates no found contamination from the subsurface oil vapor monitoring point or in the groundwater. The report recommends resampling air quality in the press room/storage area to further investigate the presence of xylenes.

The Maxymillian Technologies report dated August 28 should be read in conjunction with the Maxymillian Technologies report dated July 31, 1995, which has previously been forwarded to you. The July 31st report describes the removal of an underground storage tank outside of the building at 425 Main Street, Bennington, Vermont. The July 31 report also refers to a soil sample at 4 feet below grade showing a concentration of 630 ppm of TPH. In reviewing the reports regarding 425 Main Street, we would appreciate your consideration of whether the Vermont DEC will require any further action with regards to any of the items contained in either the July 31 or August 28 reports.

I will be calling you tomorrow with regard to these matters. As I mentioned to you, this real estate is being transferred and the closing will be occurring between the 29th and 31st of August. Anything that can be done to expedite the DEC's review of these sites would be greatly appreciated.

If I can be of any assistance, please let me know.

Very truly yours,

CAIN, HIBBARD, MYERS & COOK



Steven Taylor Smith

STS/thp
Encl.
BLET#33533
pc: Mary Van Cleve, Esquire (via telecopier)

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 SCOTT LAWSON GROUP
 TEL: 603-228-3871
 CAIN HIBBARD MYERS COOK
 AUG 28 '95
 12:51 NO.005 P.07

THE SCOTT LAWSON GROUP, LTD.
 P.O. BOX 3304, CONCORD, NEW HAMPSHIRE 03302
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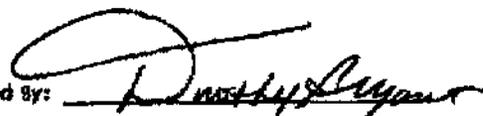
Maxymillian Technologies
 1901 East Street
 Pittsfield
 MA 01201

Report Date : August 28, 1995
 SLG Job No. : 950176
 Project : IH Monitoring

SLG Lab No.	Sample Description	Analyte	Analytical Method	Air Volume liters	mg/m ³	ppm	8Hr-TWA
88577-4	081495-176-A05, Bennington Banner, 1st Floor, Press Rm., Roll Storage, 50' S. of VSI Site.	Xylenes	NIOSH 1501	431.6	0.39	0.086	----
88578-4	081495-176-A06, Bennington Banner, Base Floor, S. Wall, Adj. to VSI Remed. Area.	Xylenes	NIOSH 1501	440.1	0.34	0.077	----
88579-4	081495-176-A07, Bennington Banner, Base Floor, N. Side Adj. to Fuel Storage Tanks.	Xylenes	NIOSH 1501	450.5	0.23	0.054	----
88580-4	081495-176-A08, Bennington Banner Background, Out. Bldg., SW Corner by Storage Doors, 5' Out VSI.	Xylenes	NIOSH 1501	413.1	0.18	0.041	----
88581-4	081495-176-BLD1, Analytical Field Blank.	Xylenes	NIOSH 1501	0.0	<0.0025mg	<0.0025mg	----

Samples analyzed by High Performance Liquid Chromatography are quantitated by matching the retention times of sample peaks with those of known compounds. A matching retention time is not a proof of chemical identity.

* = Breakthrough detected, actual values may be greater than results reported.
 < = Less than.

Reviewed By: 

Approved By: 
 Beverly Bear Drubin, Lab Director

solvent(3)

08/30/95 WED 11:35 FAX 413 443 7694
 SCOTT LAWSON GROUP TEL: 603-228-3871
 CAIN HIBBARD MYERS COOK
 AUG 28, 95
 12:51 No. 005 P.06

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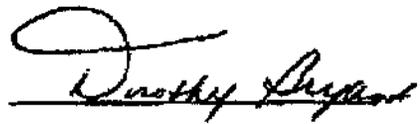
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 Pittsfield
 MA 01201

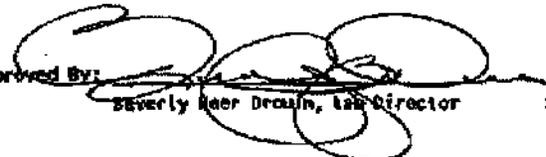
Report Date : August 23, 1995
 SLG Job No. : 950176
 Project : IH Monitoring

SLG Lab No.	Sample Description	Analyte	Analytical Method	Air Volume Liters	mg/m ³	ppm	8HR-TWA
88573-4	081495-176-A01, Bennington Banner, 1st Floor Office Area, Front of Bldg. (North Side).	Xylenes	NIOSH 1501	422.0	0.16	0.037	----
88574-4	081495-176-A02, Bennington Banner, 1st Floor, Circulation Dept. Cor. of Office Area on Desk.	Xylenes	NIOSH 1501	457.9	0.21	0.048	----
88575-4	081495-176-A03, Bennington Banner, 1st Floor, S. Wall, Off. Hall, Adj. to Printing Area, 5' Fire Door	Xylenes	NIOSH 1501	440.8	0.30	0.069	----
88576-4	081495-176-A04, Bennington Banner, 1st Floor, Paper Storage, S. End of Bldg. 15' VST Location.	Xylenes	NIOSH 1501	446.3	0.34	0.079	----

Samples analyzed by High Performance Liquid Chromatography are quantitated by matching the retention times of sample peaks with those of known compounds. A matching retention time is not a proof of chemical identity.

- * = Breakthrough detected, actual values may be greater than results reported.
- < = Less than.

Reviewed By: 

Approved By: 
 Beverly Neer Drouin, Lab Director solvent(3)

CAIN, HIBBARD, MYERS & COOK
A Professional Corporation
Counselors At Law
66 West Street
Pittsfield, MA 01201-5764
(413) 443-4771

FAX COVER SHEET

OUR FAX IS: (413) 443-7694

Date: 8/30/95
From: Steven F. Smith
Client/Matter: 540/092
Number of Pages, Including Cover Sheet: 3

- 1. NAME: Jason Feingold FAX: 802-241-3291
COMPANY: TEL:
- 2. NAME: FAX:
COMPANY: TEL:
- 3. NAME: FAX:
COMPANY: TEL:
- 4. NAME: FAX:
COMPANY: TEL:
- 5. NAME: FAX:
COMPANY: TEL:

Message, if any, to recipients:

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AUG 3 10 23 AM '95
HAZARDOUS MATERIALS
MANAGEMENT DIVISION

July 31, 1995

Mr. Steven Smith, Esquire
Cain, Hibbard, Myers & Cook
66 West Street
Pittsfield, MA 01201

Reference: Eagle Street Realty Trust (ESRT)
Underground Storage Tank Removal
Bennington Banner Building, 425 Main Street, Bennington, VT

Dear Mr. Smith:

We are writing to summarize site conditions encountered and field activities undertaken relative to the removal of one 500-gallon #2 heating oil underground storage tank (UST) from the above referenced site. The tank removal, conducted by Maxymillian Technologies, Inc. (MT), took place between 12 and 25 July 1995, as part of those activities outlined in the signed letter proposal dated 11 July 1995. Those activities not related to this tank removal will be summarized under separate cover.

The tank, which was located immediately west of the paper storage area receiving door and adjacent to the rear wall of the office area, was utilized by an ESRT building tenant. Figure 1 illustrates the tank location.

The initial investigation, conducted on 12 July, 1995, was undertaken to determine the condition of the 30-year-old (estimated) storage tank and to assess subsurface soil conditions adjacent to the tank. Mr. Paul Renouf of Environmental Service of America, Inc. (ENSA) was on-site to observe and document site activities and field conditions for the potential buyer of the property.

The exact location of the storage tank was unknown. However, based on information provided by ENSA a test pit was excavated adjacent to the tank's summarized location (Figure 1). During excavation, the southerly side wall of the tank was encountered (running parallel to the northerly side wall of the test pit excavation).

The test pit excavation continued to a depth of approximately six feet below grade. Soils encountered in the excavation consisted of dry, tan, brown, intermixed fine to medium sand, some scrap metal, broken pottery and ash. Staining sheen and/or free product was not encountered. Ground water was not encountered.



During excavation soil samples were collected and screened using an HNU Photoionization Detector (PID). Screening results are presented below. The results are presented in parts per million (ppm).

Sample Number	Sample Depth (feet) Below Grade	Sample Location	PID (ppm)
1	2.0'	Bottom of Test Pit During Excavation	0.0
2	3.5'	Bottom of Test Pit During Excavation	0.0
3	5.4'	Approximately 0.5 Feet Below Base of Storage Tank	22.0
4	6.5'	Bottom of Test Pit During Excavation	0.0

Given the elevated PID reading (22.0 ppm), encountered at the 5.4 foot depth, ESRT was advised that a suspected release may have occurred and that the Vermont Department of Environmental Conservation (VT DEC) should be notified. Mr. Mark Coleman of the VT DEC Underground Storage Tank Program was contacted at approximately 10:45 a.m. on 12 July, and advised of the situation. Following discussion, it was determined that the UST would remain in place until ESRT could provide the tenant with an alternate storage (a 250-gallon in-basement storage tank). The alternate was to be provided by ESRT as soon as possible. The test pit would be backfilled for reasons of safety. In the interim MT's activities would shift to the other areas of concern. Mr. Coleman provided verbal approval for the above outlined activities.

On 23 July 1995, representatives of MT were on-site to begin excavation and removal of the 500-gallon UST. Mr. David Balk of ENSA was on-site representing the potential buyer.

The top of the tank was exposed at approximately 8:00 a.m. and the fill, vent and fuel feed lines removed. The fill and vent ports were fitted with screw plugs.

During exposure of the top of the tank one composite soil sample was collected from the area around the fill and vent lines and screened with the PID. A reading of 0.0 ppm was recorded.

At 9:40 a.m. a technician from Tuttle's Oil, Depot Street, Bennington, VT, arrived on-site to transfer a portion of the estimated 420 gallons of heating oil remaining in the tank into the new 250-gallon storage tank, located in the tenant's basement. Tuttle's Oil completed product transfer at 10:00 a.m. Remaining product in the UST (estimated to be 170 gallons) was transferred by MT, via a two inch diaphragm pump, into 55 gallon barrels. The ultimate outcome of drummed oil is to be determined by ESRT.

The tank, which measured approximately four feet in diameter by 5 feet in length, was removed from the excavation at 11:20 a.m. No apparent evidence of staining sheen and/or free product was noted in the excavation. However, examination of the tank indicated that tank failure



appeared to be in progress. A small area of staining and noted petroleum odor was observed along the bottom easterly end of the tank. Later removal of rust and dirt from the bottom of the tank revealed one visible hole near the easterly end.

Four soil samples were collected from the tank grave, one was collected from either end of the excavation at a depth of approximately 0.5 feet below base of the tank. A third sample was collected from approximately 1 foot below the bottom of the tank in the center of the excavation. A fourth sample was collected from the easterly end wall of the tank grave approximately 1.6 feet below the bottom of the tank. The following PID Readings were recorded:

Sample #	Sample Location	Sample Depth Below Grade (feet)	PID (ppm)
1	East End Wall	5.75'	0.0
2	West End Wall	5.25'	0.0
3	Bottom	5.66'	8.5
4	Bottom East	6.91'	1.0

No ground water was encountered.

Based on the above information, the excavation was backfilled at approximately 12:30 p.m. Prior to backfilling the point at which the fuel feed lines passed through the basement wall was patched inside and out with concrete. At approximately 2:00 p.m. the tank was purged with nitrogen. The tank was then transported to Mass Tank in Chicopee, MA for disposal.

Site activities were concluded at 3:00 p.m.

Based on field investigations and PID soil sample screening, a release from the 500-gallon #2 fuel oil storage tank has not occurred on-site. No further remedial activities appear necessary.

Site investigations conducted by ENSA as part of Phase I and II Environmental site Investigations conducted for the potential buyer of the property included the installation of a soil boring (SB #1). Figure 1 illustrates the boring location.

A soil sample collected from this boring at a depth of 4.0 feet below grade was analyzed according to EPA Test Method 418.1 for Total Petroleum Hydrocarbon (TPH). A TPH concentration of 630 ppm was reported. Based on our site investigations, the identified contaminant concentration does not appear to be related to the UST and the contaminant concentration, in and of itself, does not appear to present a threat to the environment.



It is our recommendation that a copy of this letter report be submitted to Mr. Chuck Schwer of the VT DEC for review and comment.

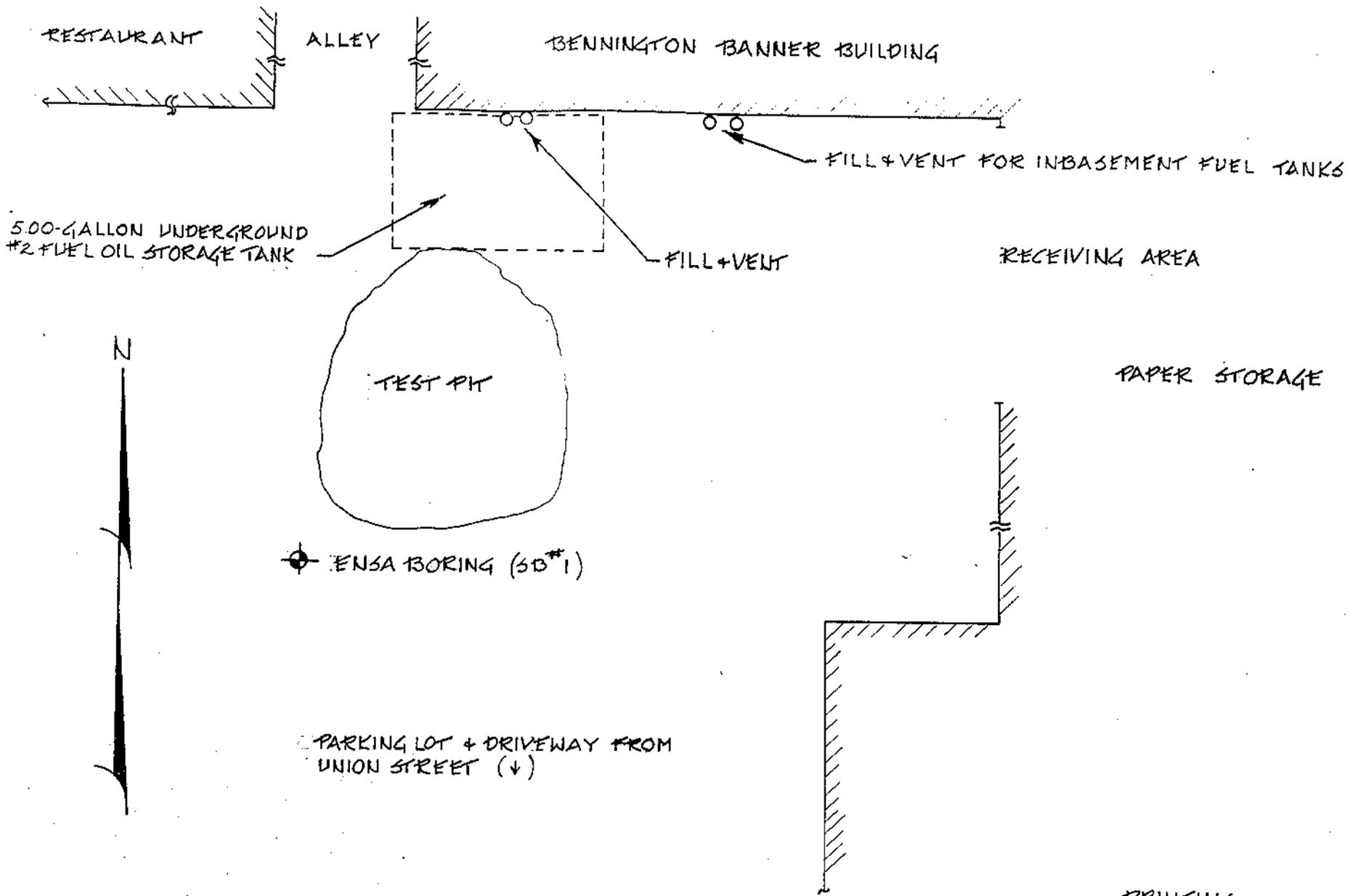
Very truly yours,

MAXYMILLIAN TECHNOLOGIES, INC.

Robert F. MacLean
Licensed Site Professional

Attachment

cc: Chuck Schwer - VT DEC
David Gagnon - ENSA
Mary Van Cleve, Esquire
File



SITE PLAN
Scale: 1" = 4'

PRINTING

Design <u>RFM</u> Drawn <u>RFM</u> Check _____		EAGLE STREET REALTY TRUST SITE INVESTIGATIONS BENNINGTON BANNER BENNINGTON, VERMONT	JOB# 95069 DATE: JULY 1995	FIGURE 1	
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