

State of Vermont
Department of Environmental Conservation
Waste Management Division
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August 24, 2007

MR MERLE MILLER
STATE OF VERMONT
BLDG & GENERAL SERVICES
2 GOV AIKEN AVE
MONTPELIER VT 05602

RE: Sites Management Activity Completed (SMAC) at Middlesex General Services Building
Middlesex, Vermont (SMS Site# 1997-2130)

Dear Mr. Miller:

Based review of information contained in the site file, the Sites Management Section (SMS) has the following understanding of the site:

- In October 1996, the Department of Building & General Services (BG&S) notified the Department of Environmental Conservation (DEC) that the photo-processing operation within the Middlesex General Services Facility has been discharging waste water containing silver and chromium into the onsite septic system.
- In March 1997, BG&S submitted a report describing past and current waste management practices associated with the photo-processing operations and providing recommendations to eliminate the waste stream. Initial revisions were made to current practices to eliminate the discharge of photo-processing chemicals into the septic system.
- On behalf of BG&S, Stone Environmental conducted an initial site investigation to determine if photo-processing chemicals, specifically silver and chromium, have migrated beyond the septic system. Based on the report dated October 9, 1997, an investigation was conducted at the Middlesex facility and the Fowler septage field in Plainfield. Six soil borings were advanced within the two onsite leachfield and one soil boring was advanced in the apparent hydraulically downgradient direction from the leachfields. The Fowler septage field in Plainfield was also investigated because approximately 2,500-gallons of septage was pumped from the General Services Building tank and dumped onto a portion of the Fowler field. Soil samples from both the Middlesex facility leachfield and Fowler field had silver and total chromium concentrations below EPA Region 9 Preliminary Remediation Goals (PRGs) and EPA Region 3 Risk Based Concentrations (RBCs) for residential areas.
- In 1998, small concentrations of tetrachloroethene (PCE) were found in the septic tank for Middlesex facility and water supply well for the BG&S Building. Because this water supply is a public system, on-going monitoring is required. The last time a volatile organic compound (VOC) was found above the detection limits was June 9, 1999.

Over

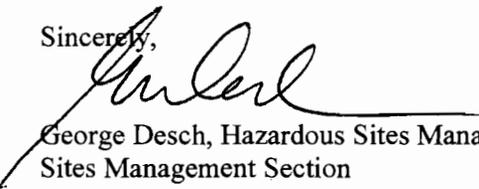


- The three closest neighboring wells (Verizon Complex, Green Mountain Florists, and the Dolan Residence) were sampled several times between 1997 and 2007 for silver, chromium and VOCs. The neighboring wells were last sampled in November 2006. None of the neighboring wells has ever had detectable concentrations of these target metals and VOCs.
- The potential source of PCE and its daughter products was traced back to chemicals used in the print shop. BG&S evaluated the chemicals used in the print operation and eliminated the use of cleaning solutions containing chlorinated solvents. In 2001, BG&S completed the installation of an evaporator which receives waste streams, including drains, from the print shop and photo-processing areas. The waste streams from these areas are now separated from the septic system. In addition, BG&S generated policy and procedures in place to ensure staff and the adjacent police barracks are educated about the prohibition of discharging non-domestic waste into the septic system and that waste generated in the evaporator is properly disposed.
- Since the initial 1997 investigation, several subsequent investigation activities have taken place to better define the degree and extent of the contamination. This included collecting soil samples within the two onsite leachfields; installing monitoring wells and piezometers; and completing groundwater profiles using an investigative method that allows for the collection of discrete groundwater samples within a boring. Depth to groundwater ranged from 32 feet to 38 feet. Tetrachloroethene (PCE) was detected in MW-1 and MW-2 sampled in November 1999. The highest PCE concentration was 7.7 parts per billion (ppb) in MW-2. The Vermont Groundwater Enforcement Standards (VGES) for PCE is 5 ppb.
- Groundwater sampling has been ongoing at the site since monitoring wells were installed in 1999. The highest PCE concentrations in both wells were from the November 1999 sampling event. The concentration in MW-1 have never exceeded the VGES. The PCE have been below the VGES since December 1999. The last monitoring event was in November 2006. PCE was the only detectable concentration in groundwater samples from MW-1 and MW-2. PCE concentrations in MW-1 and MW-2 were 0.5 ppb and 0.9 ppb, respectively. The declining concentrations support Stone Environmental's position that the discharge of PCE into the septic tank has ceased and the small contaminant plume is confined to the site.
- In 2007, MW-3 and MW-4 were permanently closed, following the requirements in Section 12.3.5 in Appendix A of the Vermont Water Supply Rule- Chapter 21. PZ-1 was previously closed. PZ-2 and PZ-3 could not be found. Monitoring wells MW-1 and MW-2 will remain open so that groundwater sampling immediately downgradient of the leachfield is readily available. A monitoring well maintenance plan dated February 8, 2007, is in place and is acceptable to the SMS.

Based on the above understanding of the site, the SMS believes that the residual contamination within the septic system and the subsurface from past releases does not pose an unreasonable risk to human health and safety or the environment. Therefore, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release current or past owners of any past or future liability associated with contamination found at the site. It does, however, mean that the SMS is not requesting any additional work at this time. Also, this SMAC designation does not obviate BG&S responsibility to ensure compliance with other applicable requirements, such as the wastewater and hazardous waste rules.

Please do not hesitate to contact me or John Schmeltzer of my staff. We can be reached at 802.241.3888.

Sincerely,



George Desch, Hazardous Sites Manager
Sites Management Section

c: Middlesex Selectboard
DEC Regional Office
Roger Thompson, Wastewater Division
Peter Marshall, Hazardous Waste Program