



## State of Vermont

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Department of Environmental Conservation  
State Geologist  
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AGENCY OF NATURAL RESOURCES  
Department of Environmental Conservation

Waste Management Division  
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December 28, 1999

BOB MORIN  
GREEN MOUNTAIN METALS  
PO BOX 83  
WINDSOR VERMONT 05089

RE: Site Management Activity Completed, Green Mountain Metals, 737 Route 5 South  
Windsor, Vermont (Site #97-2174)

Dear Mr. Morin:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has received confirmation from the Windsor Town Clerk that a Notice has been added to the Land Record for the above referenced property. This Notice describes the type and location of residual soil contamination remaining at the site, and also delineates where subsurface disturbance is prohibited. With this institutional control established, the site is now eligible for a SMAC (Site Management Activity Completed) designation. This determination is elaborated on below.

The contamination at the site was associated with cutting oil and other wastes from prior metal turning operations. The contaminants of concern include chromium, lead, and petroleum hydrocarbons (TPH). Deeper soil contamination (7' to 16' below ground surface) is associated with metal shavings used as fill material in the 1960's. Shallower contamination is limited to the area around a wastewater discharge pipe. A total of 15 tons of the shallow contaminated soils were excavated, and later thermally treated and recycled at Environmental Soil Management, Inc. in Loudon, New Hampshire. Currently, all residual soil contamination is at depths that preclude frequent human exposure, and therefore poses minimal human health risks. Frequent future soil exposure should be adequately minimized by emplacement of a Notice to the Land Records. In addition to the Notice, you also decided to include the "No Subsurface Soil Disturbance Zone" within the deed and any other document of title transfer.

To determine if there was any groundwater contamination, four groundwater monitoring wells were installed and sampled. The groundwater analytical results contained no evidence of contamination above Vermont Groundwater Enforcement Standards. The area around the site is served by municipally supplied drinking water. A sensitive receptor survey performed by Dufresne-Henry, the environmental consultant retained by Green Mountain Metals, indicated that the contamination neither threatens human health nor the environment.

Based on the current conditions at this site, the SMS has determined that this site is now eligible for a SMAC designation. This means that the SMS has concluded the following:

(Over)

- metal turning operations at the site have ceased and are no longer a potential source of additional contamination at the site;
- 15 tons of petroleum contaminated soil was excavated and thermally treated at ESMI in New Hampshire;
- residual soil contamination is limited to the "*No Subsurface Soil Disturbance Zone*" delineated in the Notice to the Land Records; and
- any residual contamination does not pose an unacceptable risk to human health or the environment.

Based on the above, it appears that contamination is limited to the No Subsurface Soil Disturbance Zone, and does not pose an unreasonable risk to human health and safety or to the environment. Therefore, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release Green Mountain Metals of any past or future liability associated with the contamination remaining in the ground from the former metal turning operation. It does, however, mean that the SMS is not requesting any additional work at this time. If the monitoring wells are no longer to be used or maintained, then they must be properly closed to eliminate a possible conduit for contaminant migration into the subsurface. This closure typically involves filling the wells with a grout material to prevent fluid migration in the borehole. Specific requirements for well closure are outlined in Section 12.3.5 in Appendix A of the Vermont Water Supply Rule-Chapter 21. Also, the road box or stand-up well guard for a monitoring well must be removed before well closure is considered complete. 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: Windsor Selectboard  
Windsor Health Officer  
DEC Regional Office  
Bruce Cox, Dufresne-Henry