

State of Vermont
Department of Environmental Conservation
Waste Management and Prevention Division
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gerold.noyes@vermont.gov

October 1, 2018

HENRI MORAIS
PO BOX 44
BEECHER FALLS, VERMONT 05902

Re: Doris's Corner Store (former Noyes Express), SMS Site #97-2252, UST investigation request
Beecher Falls, Vermont

Dear Mr. Morais:

The Sites Management Section (SMS) has reviewed the Gonyaw Environmental Services (GES) report titled '*UST Closure – Doris's Corner Store – Facility ID #525 – Beecher Falls, Vermont*' for the above referenced site. The underground storage tank (UST) closure was performed on July 27, 2018 and GES performed the tank closure assessment. The report is dated September 9, 2018 and summarizes the degree and extent of contamination encountered.

- During site activities screened soils had concentrations up to 1580 parts per million (ppm) under the pump island, as measured by a photoionization detector (PID). The removed underground storage tank (UST) was a 10,000-gallon, two compartment gasoline UST that had been installed in 1997. The property has been a hazardous site, since the removal of six USTs in 1997. An investigation and groundwater monitoring occurred from 1998 until 2010. No further site work has been performed since then. Previous investigations did not include the pump island.

Based on the report information, the SMS has determined that additional work is necessary to determine the severity of contamination. The SMS requests that you retain the services of a qualified environmental professional to prepare a site investigation work plan in accordance with **§ 35-303 of the IRULE** and submit it to the SMS for approval. Failure to conduct the necessary site work is a violation of Vermont Statutes and will result in State Enforcement Actions. The workplan must be submitted to the SMS for approval within 30 days of receipt of this request. All work must be conducted in accordance with IRULE which is located on our website: <http://dec.vermont.gov/waste-management/contaminated-sites/rule> The workplan must be approved by the SMS prior to the initiation of onsite work. The following specific information should be included/evaluated in the workplan:

- ❑ Further define the degree and extent of contamination to the soil.
- ❑ If appropriate, determine if the airspace beneath the site and site adjacent building(s) (e.g. basements) has been impacted by the release using a PID. Wall and floor construction and susceptibility to vapor migration should be noted. PID measurements should be made in cracks and/or joints likely impacted. If the airspace has been impacted, SMS requests confirmatory sampling and laboratory analyses be performed using EPA Method TO-14/15.



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- ❑ Determine the degree and extent of contamination, if any, to groundwater. A sufficient number of monitoring sites should be installed to adequately define the severity of site contamination. Previously installed groundwater monitor wells should also be included, if these monitor wells are still usable. Groundwater samples should be analyzed for volatile organic compounds (VOCs) using EPA Method 8260C and total petroleum hydrocarbons (TPH).
- ❑ Assess the potential for contaminant impact on sensitive receptors. Base this update on all available information and include basements of adjacent buildings, nearby surface water, any nearby drinking water sources, wetlands, sensitive ecologic areas, outdoor or indoor air, sewers, or utility corridors. Sample and analyze any at-risk water supplies for VOCs and TPH.
- ❑ Determine the need for long-term treatment and/or monitoring that addresses groundwater contamination.
- ❑ Actively recover any free phase petroleum product measured in the ground in excess of 1/8 inch. If this is done manually, a log must be maintained which documents the dates product is measured, the thickness of the product and the amount removed.
- ❑ Submit a summary report that outlines the work performed, as well as provides conclusions and recommendations. **As appropriate** include analytical data; a site map showing the location of any potential sensitive receptors and monitoring or sample locations; an area map; detailed well logs; and a groundwater contour map.
- ❑ With the work plan please submit a site location map at an approximate scale of 1:24000 showing the location of the site. Please include a scale, a north arrow, the SMS site number, and a citation of the source map.

The submission of the above referenced UST removal report is considered notification of a release, and this letter represents the agency response and initiation of the process necessary to characterize and remediate the site. A person who may be liable for the release or suspected release of a hazardous material as established in 10 V.S.A. § 6615 shall conduct a site investigation in accordance with the requirements of the Investigation and Remediation of Contaminated Properties Rule (IRULE), dated July 2017 Subchapter 3, § 35-301, Requirement to Perform a Site Investigation.

Based on current information, investigation and remediation related to petroleum contamination at this property is eligible for reimbursement of cleanup and investigation costs of up to \$1.25 million in accordance with the *"Procedures for Reimbursement from the Petroleum Cleanup Fund"*. All expenditures must be pre-approved by the Agency and performed in accordance with the July 2017 IRULE. This document is available at <http://www.anr.state.vt.us/dec/wastediv/sms/smsgdint.htm>. A list of environmental consultants that perform this type of work in Vermont can be found at <http://www.anr.state.vt.us/dec/wastediv/SMS/pubs/consult.lst.pdf>.

The Secretary of the Agency of Natural Resources reserves the right to seek cost recovery of fund monies spent at the Doris's Corner Store site if the Secretary concludes that you, Mr. Henri Morais, are in significant violation of the Vermont Underground Storage Tank Regulations or the Underground Storage Tank statute (10 V.S.A., Chapter 59).

We realize this may be a lot to absorb and respond to. We are here to help make this process as effective and uncomplicated as possible. Please review the referenced guidance documents and if I can be of assistance, feel free to contact me.

October 1, 2018

Sincerely,



Gerold Noyes, P.E.
Environmental Engineer
Sites Management Section

CC: Jay Gonyaw, Gonyaw Environmental Services (via electronic mail)

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