

State of Vermont
Department of Environmental Conservation
Waste Management Division
103 South Main Street/West Building
Waterbury, VT 05671-0404
(802) 241-3888
FAX (802) 241-3296

April 27, 2009

RODNEY WINCHESTER
ROD'S MOBIL
RT 5 BOX 30
PUTNEY, VERMONT 05346

RE: Sites Management Activity Complete, Rod's Mobil, SMS Site #97-2309, Putney, Vermont

Dear Mr. Winchester:

The Sites Management Section (SMS) has reviewed the July 2008 report titled, "*Biennial Monitoring of Subsurface Petroleum Contamination at Rod's Mobil, Putney, Vermont*" prepared by KAS, Inc. for ground-water sampling conducted at the Rod's Mobil property on June 8, 2008. The SMS also reviewed information contained in the site file and, with respect to the release associated November 1997 removals of 3 - 4,000 gallon gasoline and one 500 gallon fuel oil underground storage tank, makes the Sites Management Activity Complete (SMAC) determination described further below:

- During the November 1997 fuel dispenser replacement and removal of three 4,000 gallon gasoline and one 500 gallon fuel oil underground storage tanks (USTs), contaminated soil was observed. Volatile organic compounds (VOC) were measured by a photoionization detector (PID). Maximum PID readings of the soils at the fuel dispenser were 340 parts per million (ppm), at the gasoline UST - 200 ppm, at the replacement UST location - 192 ppm, and at the fuel oil UST - 12 ppm. The soil was observed to be sand and small gravel. Groundwater was not encountered at the maximum excavation depth of 8'. Approximately 200 yd³ of contaminated soils were transported off site and stockpiled on the Ray Winchester property in West Brattleboro.
- On September 28, 1999, 4 groundwater monitor wells were installed in order to evaluate potential contamination related to the USTs. Sand and silt were observed from grade to 22 to 27' below the ground surface. No above background PID readings were noted during monitor well installation.
- On October 12, 1999 MW-1 to -4 were sampled for VOCs via EPA 8021B. In MW-1 1,2,4-trimethylbenzene (160 µg/L), 1,3,5-trimethylbenzene (522 µg/L), and naphthalene (60.1 µg/L) were noted above the Vermont Groundwater Enforcement Standards (VGES). Benzene (33.8 µg/L) and MTBE (198 µg/L) were noted in MW-2 above the VGES. MTBE was noted in MW-3 (16.6 µg/L) below the VGES. Total petroleum hydrocarbons at 4.6 mg/L were noted in MW-1. No contamination was found in MW-4.
- The site building and the neighboring building, Curtis Bar-B-Que, share a bedrock water supply well 250' cross gradient to the southeast. The Putney Food Co-op water supply well is

Over



approximately 150' cross gradient to the west. Both wells were sampled on October 12, 1999 using EPA Method 524.2; no VOCs were detected.

- The 200 yd³ soil stock pile on the Ray Winchester property was screened via PID. VOCs at 0.1 to 0.3 ppm in 8 soil samples from 1 to 3' depth were noted. On July 2, 2001 the stockpile was again screened and confirmatory samples collected for lab analysis. No contamination was detected in the lab samples and permission was given to thin spread these soils.
- Long term groundwater sampling was implemented to manage the site. Groundwater was sampled 7 more times and the results showed gradual site improvement. June 12, 2008 was the last sample event; xylene and trimethylbenzene were found below the VGES in monitor well MW-1. MW-2 contained no contamination. In May 2002 MW-3 contained xylene below the VGES and MW-4 contained MTBE below the VGES; sampling of these wells was discontinued at that time.
- Groundwater depth ranged from 11 to 16' below ground surface. The site building and the Curtis Bar-B-Que, are of slab on grade construction and at low risk for soil vapor infiltration. An unnamed stream 300' cross gradient to the east and the Connecticut River 2500' down gradient to the south are the nearest surface waters. The down-gradient extent of the contaminant plume was not defined, however it appears to be in open land bordering the I-91 freeway interchange. No other sensitive environmental receptors were identified. No unacceptable risk to human health and the environment is present due to any residual contamination remaining in the ground from the removed USTs.
- The three remaining groundwater monitoring wells were properly closed to eliminate possible conduits for contaminant migration into the subsurface. This closure involved removal of the protective well cover, pulling out the well casing, filling the well borehole with a grout material to prevent fluid migration into the hole, and finishing to the surrounding grade. MW-3 had been paved over in 2003 and could not be located for abandonment.

Based on the above, the SMS is assigning this site a Site Management Activity Completed designation. This SMAC designation does not release you, Mr. Winchester, of any past or future liability associated with the petroleum contamination onsite. It does, however, mean that the SMS is not requesting any additional work in response to the November 1997 UST removals. Please feel free to call with any questions.

Sincerely,



George Desch, P.E.
Chief, Sites Management Section

CC: Putney Selectboard
Putney Health Officer
DEC Regional Office (via electronic mail)
Caitlin Andrews, KAS, Inc. (via electronic mail)