



State of Vermont

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Department of Environmental Conservation
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November 9, 2005

MR JACK APPELMAN
APPLEJACK REAL ESTATE PARTNERS
PO BOX 1527
MANCHESTER CENTER VT 05255

RE: Site Management Activity Completed at Tuttle's True Value
Bennington, Vermont (Site #98-2341)

Dear Mr. Appelman:

Based on review of the file for Site # 98-2342, the Sites Management Section (SMS) has the following understanding of the site:

- Petroleum contamination was discovered at the site during a water line excavation on March 5, 1998. Soil and water samples were screened using a photoionization detector (PID). The PID readings ranged from 4.5 parts per million (ppm) to 200 ppm. The highest PID reading was in the former location of underground storage tanks (USTs). Approximately six cubic yards of soil were stockpiled onsite. According to an employee from Tuttle's True Value and an invoice from Burgess Brothers, three 500-gallon USTs were removed from the site on June 7, 1996. The Waste Management Division (WMD) has no record of notification that petroleum contamination was found during the UST removal.
- In June and July 1999, four monitoring wells (MW-1, MW-2, MW-3, and MW-4) were installed at the site. Contaminant concentrations above the Vermont Groundwater Enforcement Standards (VGES) were present in MW-3. Based on the soil borings, the upper five feet consisted primarily of sandy to gravelly silt. A zone of cobbles was found between a depth of five and eight feet, and the remainder of the 9-ft to 11-ft depth borings consisted primarily of silt. Depth to groundwater was approximately five feet and groundwater flow was to the west. The highest PID reading was 70 ppm for a soil sample collected near the ground surface of MW-1, which is located upgradient of the presumed source of contamination. The site in the area of MW-1 was covered with pavement.
- In the summer of 1999, six soil samples from the six-cubic yards of stockpiled soils were screened with a PID. The highest PID reading was 0.2 ppm. In addition, Griffin International found no visual or olfactory evidence of petroleum contamination in the stockpile. Therefore, the SMS approved the spreading of the soil onsite, which was completed in 1999.

(Over)

- On October 22, 2004, two additional monitoring wells (MW-5 and MW-6) were installed as downgradient compliance wells. Groundwater samples were collected on November 3, 2004, from the six monitoring wells and the sump located in the basement of the main building. No target volatile organic compounds (VOCs) were found in the downgradient compliance wells (MW-5 and MW-6). Also, the basement of the main building was screened for VOCs using a PID. No vapor detects were found.
- As in previous sampling rounds (two in 1999, one in 2000, one in 2001, and one in July 2004), the groundwater sample collected from MW-3 on November 3, 2004, contained target VOCs above the VGES. However, the contaminant plume appears to be confined to the property due to the absence of target VOCs in the downgradient compliance wells (MW-5 and MW-6).
- A notice to land record was filed on February 16, 2005, documenting the presence of groundwater and residual soil contamination at the site. The SMS approved the notice of land record before it was filed at the Town Clerk's office.
- On June 6, 2005, three of six monitoring wells were permanently closed, following the requirements in Section 12.3.5 in Appendix A of the Vermont Water Supply Rule- Chapter 21.
- On May 24, 2005, you, as the owner's representative, signed a maintenance plan for the remaining three monitoring wells (MW-3, MW-5, and MW-6). This plan includes inspecting the monitoring wells, roadboxes, etc., at least once a year and make repairs if necessary. Inspection results will be sent to the SMS documenting that the required maintenance and inspection were completed.

Based on the above understanding of the site, the SMS believes that the residual contamination at the site from the petroleum release 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 the contamination found at the site. It does, however, mean that the SMS is not requesting any additional work at this time.

Also, the SMS understands that the remaining three monitoring wells will be monitored periodically and if the contaminant levels in the three wells decline to below the VGES, then a petition may be submitted to the SMS requesting an additional notice to record be filed stating that contaminant levels in the onsite wells are now below the VGES. Please understand that since the site will have already been closed, it will be the responsibility of the property owner to facilitate any change in the land record. The SMS has no objections with the ongoing monitoring of the remaining wells. However, costs associated with the monitoring wells, including filing of new land record notices are not reimbursable by the Vermont Petroleum Cleanup Fund (PCF).

Sincerely,



George Desch, Hazardous Sites Manager
Sites Management Section

cc: Chris Ward, KAS, Inc.
Walter Freed, Apollo Industries
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