



State of Vermont

Department of Fish and Wildlife
Department of Forests, Parks and Recreation
Department of Environmental Conservation
State Geologist
RELAY SERVICE FOR THE HEARING IMPAIRED
1-800-253-0191 TDD>Voice
1-800-253-0195 Voice>TDD

AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation
Waste Management Division
103 South Main Street / West Building
Waterbury, Vermont 05671-0404
802-241-3888
Fax 802-241-3296

June 3, 1999

JASON DUNBAR
VICE PRESIDENT
MORGAN-TUTTLE, INC.
MORGAN STREET
BELLOWS FALLS VERMONT 05101

RE: Sites Management Activities Complete (SMAC), Former Keltons CPD
SMS Site #98-2377, Bellows Falls, Vermont

Dear Mr. Dunbar:

The Sites Management Section (SMS) has reviewed the April 13, 1999 Tighe & Bond report titled, "*Site Investigation Report, Former Kelton's CPD, 21 Tuttle Street, Bellows Falls, Vermont*" and the SMS site file. Based on this review, the SMS has determined the following:

- During the December 3, 1998 removal of 2 gasoline and 2 waste oil/#2 fuel oil Underground Storage Tanks (USTs), contaminated soil was observed. A soil sample taken from under UST #1 showed a total petroleum hydrocarbon (TPH) content of 490 mg/kg. No sheens or free product were observed. Contaminated soils were backfilled.
- On February 9, 1999, 3 soil borings were advanced, two of which were finished as groundwater monitor wells in order to evaluate potential contamination related to the USTs. Medium to coarse sand was observed. VOC readings ranging from 0.9 to 17.6 ppm (7.5' below ground surface [bgs]) were noted in the soil samples from MW-4. VOC readings ranging from non-detect to 215 ppm (7.5' bgs) were noted in the soil samples from MW-5. VOC levels in both wells decreased with depth. SB-3 was installed inside the building and no detectable VOCs were found (maximum depth: 32' bgs).
- On February 19, 6 monitor wells (4 wells were pre-existing) were sampled for VOCs via EPA 8260 and TPH via EPA 8100M. Groundwater depth varied from 27 to 29.7' bgs. No target analytes were detected in MW-1, -2, -3, and -5. TPH at 1.5 mg/L was found in MW-4. Toluene (5.8 µg/L), ethylbenzene (2.5 µg/L), and xylene (7.4 µg/L) were noted in MW-NN2. No contaminants were present in the

over

groundwater, above Vermont Groundwater Enforcement Standards.

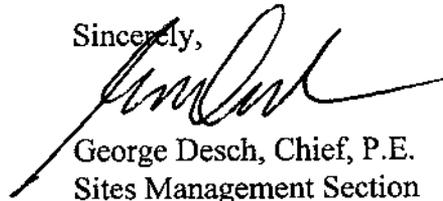
- The extent of the contamination was shown to be confined to the soils at the former UST locations. These soils were identified as the only sensitive receptors.
- The Connecticut River 800' to the east is the nearest potentially at-risk surface water. The site is served by municipal water and sewer. No other at-risk sensitive receptors were identified.
- An approved Notice to Land Records describing the residual contamination on site has been prepared and recorded in the Town of Rockingham land records for this property.

Based on the above, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release the Morgan-Tuttle Inc. of any past or future liability associated with the petroleum contamination on site. It does, however, mean that the SMS is not requesting any additional work in response to the 1998 UST removal.

If the monitoring wells are no longer 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.

Please feel free to call with any questions.

Sincerely,



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

CC: Rockingham Selectboard
Rockingham Health Officer
DEC Regional Office
Paul Renouf, Tighe & Bond