State of Vermont

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November 1, 1999

JOHN OSGOOD
PHILLIPS CONSTRUCTION SERVICES
PO BOX 1037
WAITSFIELD VERMONT 05673

RE: Phillips Construction Services (Site #98-2511)
Route 100, Waitsfield

Dear Mr. Osgood:

The Sites Management Section (SMS) has reviewed the October 19, 1999 report titled, "*Annual Monitoring of Subsurface Petroleum Contamination at Phillips Construction Services*" prepared by Griffin International. The SMS has also reviewed information contained in the site file on the above mentioned site. Based on this information, the SMS has concluded the following:

- On September 23 and 24, 1998 two diesel fuel underground storage tanks (USTs) and two gasoline USTs were closed in place; one aviation gasoline UST was removed from the Phillips Construction Services property in Waitsfield.

- During the UST removals, soils surrounding the aviation gas UST and at the diesel fuel dispenser were found to be contaminated with petroleum compounds at concentrations above SMS guideline levels, as measured with a photoionization device (PID). No evidence of groundwater contamination (free product) was observed during the UST removal. Additional investigation was required by the SMS. Two new groundwater monitor wells were installed to supplement the 5 existing monitor wells in order to investigate the potential for contamination to the groundwater.

- All 7 wells and the on-site water supply well were sampled in September and October. The 2 monitor well closest to the diesel tanks showed low levels of petroleum contamination. MW-3 contained naphthalene at 68.1 μg/L, which is above the Vermont Groundwater Enforcement Standards (VGES). 1,2,4- and 1,3,5-trimethylbenzene, toluene, xylene, and ethyl benzene were also detected below VGES in MW-3 and GMW-1. No other wells contained detectable contaminants. Because of the VGES exceedence, sampling of the 3 wells closest to the diesel tank was requested, as well as sampling of the water supply well via the more sensitive EPA Method 524.2.

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- Re-sampling was done on September 23, 1999. MW-3 contained 4.0 μg/L of naphthalene and GMW-1 contained 1.2 μg/L of 1,2,4-trimethylbenzene both of these levels are lower than the previous concentrations and below their respective VGES. No volatile organic compound contaminants were detected in the water supply sample.

- The nearest surface waters are a small pond and the Mad River, which is approximately 500' from the source area. The pond was inspected for sheens and seeps along its' bank, and none were found. There are no known underground utilities down gradient of the source area.

- The area is served by a water supply well which has been sampled twice with no detectable petroleum product contamination found. The 4 USTs which were closed in place, are under concrete paving. No unacceptable risk to human health and the environment is present due to any residual contamination remaining in the ground from the removed USTs.

Based on the above, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release Phillips Construction Services 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 1998 UST removals.

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: Waitsfield Selectboard
Waitsfield Health Officer
DEC Regional Office
Robert Higgins, Griffin International

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