



State of Vermont

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Department of Environmental Conservation
State Geologist
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AGENCY OF NATURAL RESOURCES
Department of Environmental Conservation

Waste Management Division
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July 19, 1999

EDIE COLE
BUSINESS MANAGER
BLACK RIVER ELEMENTARY SCHOOL
16D BRIDGE STREET
LUDLOW VERMONT 05149

RE: Site Management Activity Completed, Black River Elementary School
SMS Site #98-2526
Ludlow, Vermont

Dear Ms. Cole:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has reviewed the Marin Environmental "Initial Site Investigation Report, Black River Elementary School, Ludlow, Vermont" dated July 7, 1999, in which a petition is made for giving the site a Site Management Activity Completed (SMAC) designation. Subsurface investigative work was conducted at this site following the discovery of a petroleum release during the removal of one (1) No. 2 heating oil underground storage tank (UST) on October 20, 1998.

To define the degree and extent of soil and groundwater contamination, four groundwater monitoring wells were installed. The monitor well in the former UST location did contain some residual soil contamination, as evidenced by elevated volatile organic compound levels measured by a photoionization detector during well installation. The groundwater samples collected from the monitoring wells MW-1 (tank location), MW-2 (up-gradient), and MW-3 (down-gradient) did not contain detectable petroleum product contamination. The sample from MW-4 (down-gradient) contained xylene at 1.2 parts per billion (ppb) benzene; the Vermont Groundwater Enforcement Standard (VGES) for xylene is 10,000 ppb. A trace of 1,2,4-trimethylbenzene below the lab quantitation limit was also noted. The site sensitive receptor survey indicates that the release neither threatens human health nor the environment.

Based on the current conditions at this site, the SMS has determined that this site is now eligible for a SMAC designation. This means that the SMS has determined the following:

- residual soil and groundwater contamination is limited to the immediate vicinity of the former UST area and will be naturally attenuated over time; and

over

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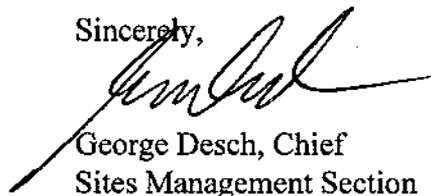
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- any residual contamination does not pose an unacceptable risk to human health or the environment.

Based on the above, it appears that petroleum contamination was confined to the former UST location and does not pose an unreasonable risk to human health and safety or the environment. Therefore, the SMS is assigning this site a SMAC designation. This SMAC designation does not release the Black River Elementary School of any past or future liability associated with the petroleum contamination remaining in the ground from the removed UST. It does, however, mean that the SMS is not requesting any additional work at this time.

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. Also, the road box or stand-up well guard for a monitoring well must be removed before well closure is considered complete. If you have any questions or comments, please feel free to contact either me or Gerold Noyes at 802-241-3888.

Sincerely,



George Desch, Chief
Sites Management Section

CC: Ludlow Selectboard
Ludlow Schoolboard
DEC Regional Office
Michael Laurent, Marin Environmental