



## State of Vermont

Department of Fish and Wildlife  
Department of Forests, Parks and Recreation  
Department of Environmental Conservation  
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AGENCY OF NATURAL RESOURCES  
Department of Environmental Conservation  
Waste Management Division  
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November 17, 1999

Mr. Art Paulin  
Paulin, Inc.  
P.O. Box 213  
Shaftsbury, VT 05262

RE: Paulin, Inc. in Shaftsbury (Site #98-2530)

Dear Mr. Paulin:

The Sites Management Section (SMS) has reviewed the October 7, 1999 letter from Griffin International which included analytical results from MW-4 and the outfall of the cistern. Based on the laboratory data, the SMS has determined the site to be eligible for a Site Management Activity Completed (SMAC) designation.

This determination was based on the following information:

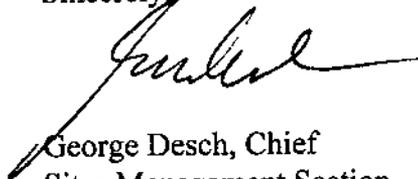
- The likely source of the petroleum contamination was the three underground storage tanks (USTs) which were removed from the ground on October 2, 1998.
- Groundwater does not contain petroleum contaminants at levels which are in excess of Vermont Groundwater Enforcement Standards (VTGWES). This is indicated in laboratory analytical results for MW-1, MW-2, and MW-3 from the May 18, 1999 sampling event, and for MW-4 from the September 29, 1999 sampling event.
- Contamination is not entering the adjacent unnamed stream, as indicated by the non-detect analytical results from the sample which was taken from the outfall of the cistern where it entered the stream.
- Little to no risk is posed to sensitive receptors in the area from any subsurface petroleum contamination which may remain at the site.

Based on the results of the investigation, the site has been assigned a Site Management Activity Completed (SMAC) designation. Sites which the Waste Management Division have determined require no further management are given a SMAC designation. The designation does not release Paulin, Inc. from any past or future liability which may arise from the petroleum contamination which originated from the former USTs at the Paulin, Inc. facility in Shaftsbury. The SMAC designation does mean that the SMS isn't requiring any additional work be performed at this site in response to the initial contamination.

If the monitoring wells at the site 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. The SMS considers reasonable costs to properly close monitoring wells at this site reimbursable by the Petroleum Cleanup Fund if uninsured and eligible costs for cleanup at the site exceed the \$10,000 deductible.

Please feel free to call either me or Chuck Schwer if you have any questions regarding the above.

Sincerely,



George Desch, Chief  
Sites Management Section

c: DEC Regional Office  
Shaftsbury Selectboard