



State of Vermont

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August 21, 2000

REGINALD GODDARD
GODDARD'S TRANSPORTATION, INC
PO BOX 185
FAIR HAVEN VERMONT 05743

RE: Site Management Activity Completed, Goddard Transportation, SMS Site #98-2567
Fair Haven, Vermont

Dear Mr. Goddard:

The Sites Management Section (SMS) has reviewed the August 7, 2000 report titled, "*Floor Drain Drywell Removal, Goddard Transportation Terminal, Castleton, Vermont*" prepared by ALX Environmental for work conducted at the above referenced site. The SMS has also reviewed information contained in the site file. With this information, the SMS can now make the following conclusions:

- During the December 1998 removal of one fuel oil underground storage tank (UST), contaminated soil, holes in the UST, and a groundwater sheen were observed. Contaminated soils were backfilled. Additional investigation was required by the SMS.
- On May 4, 1999, three groundwater monitor wells were installed in order to evaluate potential contamination related to the USTs. On May 11, MW-1 to -3 were sampled for volatile organic compounds (VOCs) via EPA 8021B. No target analytes were detected in MW-1. In MW-2, 1,2,4-trimethylbenzene (1.1 µg/L) was noted. Traces below the quantitation limit of ethylbenzene, xylene, 1,2,4-trimethylbenzene, 1,3,5-trimethylbenzene, and naphthalene were noted in MW-2 and MW-3. None of the detected compounds were above the Vermont Groundwater Enforcement Standard. There were numerous unidentified gas chromatogram peaks noted in the analyses for MW-2 and -3. Total petroleum hydrocarbon (TPH) was 0.49 mg/L at MW-2. TPH was not detected at MW-1 or -3. MW-2 is down gradient of a floor drain effluent drainage swale, which is the outfall of a settling pit. MW-3 is down gradient of the floor drain line. Soil sampling performed by WCM Group of Texas, as part of a Phase II site assessment, showed acetone at 240 and 590 µg/kg and methylene chloride at 5 and 8 µg/kg.

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- Confirmatory sampling and floor drain closure was required by the SMS.
- The September 8, 1999 groundwater samples from MW-1 to -3 showed no detectable groundwater contamination. No additional groundwater sampling was required by the SMS. It was agreed in letters and telephone conversations between the SMS and Mr. Goddard that the floor drain inlet would be capped immediately and the outfall drywell/catch basin excavated during Spring 2000.
- The floor drain line was flushed and on June 7, 2000 a Clean Harbors vacuum truck was used to pump 3000 gallons of water and sludge from the drywell. This was sent for proper disposal to their facility in Portland Maine. The outlet of the drain pipe was capped. The drywell was excavated and 194 tons of contaminated soil was transported to the ESMI facility in Ft. Edwards, New York for proper disposal.
- Prior to excavation and disposal, soil samples from the drywell outfall were analyzed for PCBs, RCRA metals, and TPH. No PCBs were detected, metals were found at low levels, and TPH was found at 1,290 and 3,970 mg/kg. Following excavation, 8 confirmatory soil samples were taken for TPH analysis. 6 of 8 samples had no detectable TPH, the other 2 samples were 19.9 and 117 mg/kg - indicating that the majority of contamination has been removed by excavation. The SMS uses 200 and 1000 mg/kg as guidelines for residential and industrial soils.
- The Castleton River is the nearest surface water, approximately 500 feet west and down gradient. The site and surrounding properties have municipal water. No other at-risk sensitive receptors were identified. No unacceptable risk to human health and the environment is present due to any residual contamination remaining in the ground from the removed UST or drywell.

Based on the above, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release Goddard's Transportation, Inc., 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 December 1998 UST removal and July 2000 floor drain closure.

If the monitoring wells are no longer used or maintained, then they must be properly closed to eliminate possible conduits for contaminant migration into the subsurface. This closure typically involves filling the

SMS Site #98-2567

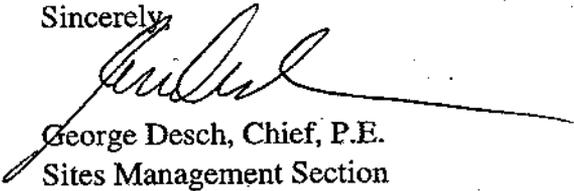
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wells with a grout material to prevent fluid migration in the borehole. Specific requirements for well closure are outlined in Section 12.3.5 in Appendix A of the Vermont Water Supply Rule-Chapter 21.

Please feel free to call with any questions.

Sincerely,



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

CC: Castleton Selectboard
Castleton Health Officer
DEC Regional Office
Nicholas Nolan, P.E., ALX Environmental