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September 29, 2004

BRIAN LEE
WHITE MOUNTAIN AUTO BROKER
466 LANCASTER ROAD
WHITEFIELD, NEW HAMPSHIRE 03598

RE: Former South Main Accessories, SMS Site #99-2664
St. Johnsbury, Vermont

Dear Mr. Lee:

The Sites Management Section (SMS) has reviewed the December 20, 1999 report titled, *"Phase II Environmental Site Assessment, 1733 Memorial Dr., former South Main Accessories Site, St. Johnsbury (Center), Vermont"* prepared by ATC Associates for work conducted at the above referenced site. The SMS has also reviewed other information contained in the site file. With this information, the SMS can now make the following conclusions:

- According to a Phase I Environmental Site Assessment (ESA), the former South Main Accessories has been an auto sales and service garage since the 1960s. Previously an Esso Station was located on the property. In 1988 a 275 gallon waste oil underground storage tank (UST) and a 1,000 gallon gasoline UST were removed from the site. VT DEC personnel were present for these removals and a small amount of contaminated soil from the waste oil UST was reportedly backfilled. No further action was required by the VT DEC.

- On October 5, 1999 one 550 gallon fuel oil UST was removed from the former South Main Accessories property. During the 1999 UST removal, soils surrounding the UST were found to be contaminated with volatile organic compounds (VOCs) at concentrations above SMS guideline levels, as measured with a photoionization detector (PID). The maximum VOC concentration was 68 parts per million (ppm). No evidence of gross contamination, such as free product or sheens, was observed during the UST removal. Groundwater was not encountered at the maximum excavation depth of 9'. Soil around the UST was reported to be sand and was excavated until no odors or above background PID readings were noted. Approximately 7 yds^3 were hauled off site for treatment at the ESMI facility in Loudon, New Hampshire. A confirmatory soil sample from the bottom of the tank pit was analyzed for VOCs via EPA Method 8021B and total petroleum hydrocarbons (TPH) via EPA 8015DRO. No VOCs were noted above test detection limits. The TPH level was 1,890 mg/kg. Additional investigation consisting of a stream impact and indoor air

over

quality assessment was required by the SMS.

- The property is on the bank of the Passumpsic River in St. Johnsbury and is partially located on fill consisting of miscellaneous scrap concrete, field stone, and foundation material from the previous site building(s). On November 3, two stream sediment samples from the Passumpsic River, were collected. These samples were analyzed for VOCs and TPH. No VOCs or TPH above test detection limits were recorded.

- The indoor air quality testing showed low levels of VOCs consistent with the property use as an auto repair facility. No OSHA air quality standards were exceeded.

- The subject building and area are served by a municipal water supply, which is not at risk of contamination from this site. No unacceptable risk to human health and the environment is present due to any residual contamination remaining in the ground from the removed USTs.

- Soil remaining at the former 550 fuel oil UST location appears to have been the only affected environmental receptor. A Notice to Land Records has been recorded on September 22, 2004 (Book #297 and Page #487-8) at the St. Johnsbury town offices regarding the residual contamination on site.

Based on the above, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release White Mountain Auto Brokers, 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 1988 and 1999 UST removals.

Please feel free to call with any questions.

Sincerely,

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

CC: St. Johnsbury Selectboard
St. Johnsbury Health Officer
DEC Regional Office (via electronic mail) 9/30/04 ✓