

WASTE MANAGEMENT DIVISION
103 South Main Street / West Building
Waterbury, Vermont 05671-0404
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May 22, 2008

Ms. Sue Cobb
Housing Vermont
123 St. Paul Street
Burlington, VT 05401RE: Sites Management Activity Complete
Leader Evaporator
25 Stowell Street
St. Albans, Vermont
SMS# 2005-3412

Dear Ms. Cobb:

This letter shall not take effect until the following have occurred: (1) the letter has been recorded as an attachment to a notice to the land records for this site; and (2) a reference to a book and page in the land records where the notice and this letter are recorded have been sent to the Division.

The Sites Management Section (SMS) has reviewed the following reports submitted on your behalf by the Northwest Regional Planning Commission's Brownfield Program:

1. *Phase I Environmental Site Assessment* dated March 31, 2005
2. *Phase II Environmental Site Assessment* dated August 9, 2005
3. *Additional Phase II Environmental Site Assessment* dated November 16, 2005
4. *Metals Delineation Report* dated April 11, 2006
5. *Corrective Action Plan* dated June 18, 2006
6. *Groundwater Monitoring Report* dated July 11, 2006
7. *Groundwater Monitoring Report* dated October 12, 2006
8. *Corrective Action Plan Amendment* dated November 21, 2006
9. *Corrective Action Plan amendment #2* dated September 14, 2007

The following is a summary of adverse environmental impacts associated with the property and the remedial actions taken to address those impacts:

- Concentrations of lead and arsenic exceeding residential preliminary remedial goals were identified in surface soils to depths of approximately three feet below ground surface along the southern perimeter of the main Leader Evaporator building (see attached figure). In accordance with the corrective action plan and as detailed in a January 16, 2007 remediation notification report, the surficial six inches of soil were removed from this area and disposed of off-site. The remaining soils at depth were covered with an indicator fabric and clean fill material.
- Concentrations of polynuclear aromatic hydrocarbons (PAHs) exceeding residential preliminary remedial goals were identified adjacent to the property boundary with Lewis Auto Body (see attached figure) in surface soils to depths of four feet below ground surface. In accordance with the corrective action plan and as detailed in a



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January 16, 2007 remediation notification report, soils within this area were excavated to a depth of two feet and disposed of off-site. The remaining soils at depth were covered with an indicator fabric and clean fill material.

- Residual petroleum contamination below residential preliminary remedial goals was identified east of the main Leader Evaporator building. Soils within this area were excavated to a depth of two feet and disposed of off-site as detailed in an August 17, 2007 remediation notification report. Clean fill material and an asphalt parking lot were constructed over a large portion of this area (see attached figure).
- Minor exceedances in concentrations of benzene and naphthalene above Vermont Groundwater Enforcement Standards exist east of the main Leader Evaporator building in the area of residual petroleum soil impacts described above (see attached figure). Quarterly monitoring has demonstrated that these concentration are stable and do not pose any risk to indoor air quality. Municipal water is available to the property and surrounding area.
- A former 14,000-gallon concrete No.4 fuel oil vault built into the northeast corner of the main Leader Evaporator building foundation was decommissioned in accordance with the correction action plan and as detailed in a March 16, 2007 remediation notification report.
- Monitoring wells have been properly abandoned in accordance with Vermont regulations.

Based on the above, the SMS is assigning this site a Site Management Activity Completed (SMAC) designation. This SMAC designation does not release you of any past or future liability associated with the above areas of concern. It does, however, mean that the SMS is not requesting any additional work at this time.

The SMAC designation is a determination by the SMS that the investigated conditions summarized above and further described in the site file, no longer constitute an unacceptable risk to human health and the environment under the property's current use. This SMAC designation is not an endorsement for all conceivable future uses of this property. In particular, direct contact and dust control precautions should be taken if any excavations are anticipated to occur within these areas of the property. These soils should be handled in accordance with existing environmental regulations if ever removed off-site.

Sincerely,



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

CC: Mr. Jim Bowes-The Johnson Company