



State of Vermont

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December 20, 1999

MARTIN NITKA
NITKA AND GLOVER
92 MAIN STREET
PO BOX N
LUDLOW VT 05149

RE: Site Management Activity Completed, Plymouth Cheese Corporation, Plymouth (Site #99-2632)

Dear Mr. Nitka:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has reviewed Griffin International, Inc.'s November 5, 1999 report titled, "*Initial Site Investigation of Subsurface Petroleum Contamination at Plymouth Cheese Corporation*," in which a petition is made for giving the site a SMAC (Site Management Activity Completed) designation. Subsurface investigative work was conducted at this site following the discovery of a petroleum release during the removal of a 1,500-gallon No. 2 heating oil underground storage tank (UST) on May 24, 1999. The most significantly contaminated soils were noted at the groundwater table, 5-7 feet below ground surface. However, since the full extent of soil contamination was unknown, all petroleum contaminated soils were backfilled.

To define the degree and extent of soil and groundwater contamination, four soil borings were advanced on September 20, 1999, with each being completed as a groundwater monitoring well. During the boring advancements, a total of 13 split spoon soil samples were collected and screened with a photoionization detector (PID). The highest PID reading was only one (1) part per million (ppm), found at a sample depth of 10-12 feet below ground surface within the boring drilled in the former UST area (completed as MW-1). The groundwater sample collected from MW-1, contained only 1.6 parts per billion (ppb) 1,2,4-trimethylbenzene and 1.8 ppb naphthalene. The Vermont Groundwater Enforcement Standards (VGESs) for 1,2,4-trimethylbenzene and naphthalene are 5 ppb and 20 ppb respectively. No other petroleum constituents were quantified above detection limits in any of the groundwater samples. Furthermore, laboratory analysis of water samples collected from both the onsite supply well and the newly installed one contained no evidence of petroleum contamination. The Griffin International, Inc. sensitive receptor survey indicated 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 concluded the following:

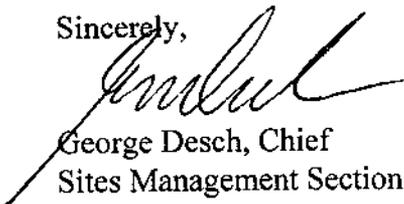
- the No. 2 heating oil UST has been removed from the ground, and is no longer a continuing source of petroleum contamination at this site;

(over)

- residual soil and groundwater contamination is limited to the immediate vicinity of the former UST area and will be naturally attenuated over time; and
- 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 Site Management Activity Completed (SMAC) designation. This SMAC designation does not release the Plymouth Cheese Corporation or its successors 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 Matt Moran at 802-241-3888.

Sincerely,



George Desch, Chief
Sites Management Section

cc: Plymouth Selectboard
Plymouth Health Officer
DEC Regional Office
Beth Stopford, Griffin International, Inc.
Terance Shearer, Springfield Regional Office
Merle Miller, State Buildings Department
John Dumville, State Historic Preservation Division
Jacob Humbert, Agency of Commerce and Community Development.