

State of Vermont
Department of Environmental Conservation
Waste Management and Prevention Division
1 National Life Drive – Davis 1
Montpelier VT 05620-3704
(802) 249-5083
FAX (802) 828-1011
richard.spiese@vermont.gov

June 4, 2019

Christopher Angier
Saint-Gobain Performance Plastics
One Sealants Park
Granville, NY 12832

RE: Follow-up on January 28, 2019 Evaluation of Corrective Action Alternatives, Former Chemfab Facility, Water Street, Prepared by Barr Engineering, North Bennington, Vermont (SMS Site #20164630)

Dear Mr. Angier:

The Vermont Agency of Natural Resources (ANR), Sites Management Section (SMS) has received and reviewed the Barr Engineering January 28, 2019 Evaluation of Corrective Action Alternatives (ECAA) for the Former Chemfab Facility, 1030 Water Street, North Bennington. This ECAA is being prepared as required in the Consent Order. The Consent Order also requires a Corrective Action Plan to mitigate the Water Street facility.

Overall, the SMS concurs with the major determinations in the ECAA, but we have some minor modifications we would like to see in a supplemental ECAA submission. Areas where the SMS agrees with the conclusions in the ECAA include:

-shallow soils located under the northeastern portion of the facility shall be address by maintaining the cap (concrete slab) over these soils while implementing an Institutional Control, thereby ensuring continued protectiveness of human health and the environment. There is a desire by the owner of the building to have you consider removal of the soils impacted above direct contact standards. Should Saint-Gobain decided to perform this work, the SMS is amenable to this approach. Should soil removal be proposed, there would be no need for an Institutional Control. The soil removal approach would need to include this action in the Corrective Action Plan.;

-soft surface building materials (insulation from the outer walls and ceiling) shall be removed, removed materials shall be disposed of, and cleaning of PFOA (PFAS) impacted building materials,



such as the floor, structural framing, and concrete walls, will ensure permanence of the remedy while protecting human health and the environment;

-no further remedial actions are needed in the basement of the building;

-no further characterization or remedial action is needed of the three sumps (Sump01, Sump02, and Sump03) based on the following:

- the sediments have been removed from these sumps;
- Barr determined that Sump01 was constructed of poured concrete with a plastic sediment trap insert above the pipe that discharged to the sanitary sewer; and
- , Sump02 and Sump03 has similar construction to Sump01 construction but with no outlet. Therefore, no further characterization of these sumps is needed; and

-groundwater shall be addressed as part of site-wide corrective actions required in the Consent Order.

Areas where the SMS does not fully agree with Barr on approaches to be used or conclusions concerning the building include:

-further characterization: Barr concluded that no further characterization of building materials at 940 Water Street is necessary. The SMS does not concur. The need for further characterization is addressed in the May 13, 2019 letter to Saint-Gobain and will not be discussed further in this letter;

-performance standards for building materials: Barr rightfully states that PFOA on building materials has not been identified as a direct contact exposure concern nor have any quantitative estimates of the absorption of PFOA through dermal exposure been identified. However, the SMS does have concerns about possible risk to users of the building to particulate inhalation (not evaluated by any entity that we know about) and about potential future environmental risks when the building is deconstructed at some yet unknown future date. The SMS also has concerns with Barr's recommended performance standard of using visual inspection to confirm the exposure pathway to potentially mobile PFOA has been mitigated. Based on these concerns, the SMS would like to see Barr work with the building cleaning contractor to test various cleanup methodologies and determine a more quantitative removal efficiency of PFOA off of these building materials. Obviously, the materials that are removed and disposed of would not need any post remediation sampling to show the PFOA removal efficiency, but the hard surfaces in the building could be test pre and post remediation to show that the selected remedy meets the expected remedial performance standard;

-office/break room, and lab areas: Barr also states that the break rooms, laboratory space, and the mix room located north of the fabrication area, and office space present south of the fabrication area do not indicate accumulation or presence of residues consistent with the former

fabrication area. Based on these observations, corrective actions would focus on residues observed in the former fabrication area only. The SMS is not convinced of this. The industrial area had swipe sample levels of PFOA ranging from 1,400 to 130,000 ng, while the office space samples were all in the thousands of nanograms (ng), with two of the five samples showing 39,000 and 30,000 ng respectively. These levels don't seem that different. Therefore, Barr should either further explain why cleaning of the office space is not needed, or plan on cleaning the office space by removing soft surfaces and cleaning, using a similar approach to that used in the manufacturing area, hard surfaces.

Please have Barr move ahead with addressing the issues. As specified in the signed CD, the revised ECAA is due within 60 days of receiving approval (again, this letter). Once we have resolved all of the issues associated with finalizing the ECAA, Barr should plan on moving on to completing the Corrective Action Plan for our review and eventual public comment. Should you have any questions with the requirements of the Secretary, feel free to contact me.

Sincerely,



Richard Spiese, Project Manager
Sites Management Section

Cc: Mary Sands, Barr Engineering
Chuck Schwer, Director, WM&PD
Matt Chapman, General Counsel, ANR
John Beling, General Counsel, DEC
Laura Murphy, VT Attorney's General Office
Carol M. Gary, Attorney, Saint-Gobain PP
Brett E. Slensky, Attorney, Saint-Gobain PP
David Edelstein, Attorney, Archer Law
Chris Gibson, Attorney, Archer Law
Ray Wuolo, Barr Engineering
Kirk Moline, CT Male
Dan Reilly, CT Male