

State of Vermont
Department of Environmental Conservation
Waste Management and Prevention Division
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AGENCY OF NATURAL RESOURCES

October 8, 2019

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

RE: Concurrence to Prepare Corrective Action Plan for Cleanup of Water Street Chemfab Facility, September 25, 2019 Building Materials Corrective Actions, 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 September 25, 2019 Building Materials Corrective Actions Memorandum for the Former Chemfab Facility, 1030 Water Street, North Bennington. The memorandum summarizes the evaluation of building material cleaning alternatives and performance standards for assessing the effectiveness of cleaning during the proposed corrective actions at the former facility. This work is a continuation of the cleanup of the former facility as required in the Consent Order. The Consent Order also requires a Corrective Action Plan to mitigate the Water Street facility. The SMS review of this information pertains to the mitigation of higher levels of PFAS that could escape the building and get into the environment as well as the eventual disposal of building material, in accordance with the Investigation and Remediation of Contaminated Properties Rule and the performance standards for the Water Street Facility in the Consent Order. The SMS review of this information does not address any potential risk to future occupants of the building.

The SMS approves of the determinations in the ECAA and the proposed work. Although we still have some concerns with not have performance standards measuring the effectiveness of building remediation, the arguments presented in this memorandum has convinced the SMS that the remedial approach recommended by Barr will remove the vast majority of residual PFOA in the building, thereby reducing any potential risk to future occupants of the building and/or any potential additional risk to the environment.



Please have Barr move ahead with addressing the issues. As specified in the signed CD, the revised Corrective Action Plan is due within 60 days of receiving approval (this letter) to proceed. Once the SMS receives the Corrective Action Plan, and assuming it is accepted as written, it will go out for a 30-day public comment period. Once this comment period is passed, and assuming there are no significant changes that need to be addressed based on this public comment, Barr may move ahead with implementing the actions stated in the Plan. 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
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