DRAFT Response to Comments – Long Falls Paperboard SSQAPP

Comments received from Mr. Robert Reinhart, US EPA, June 20, 2019.

Comment 1. “Pages 26-28: I do not agree with the approach for VOCs. Where VOCs are a contaminant of concern, it is not appropriate to rule out contamination based solely on the PID reading. Please address.”

Response. In addition to PID readings, Stone will be making visual and olfactory observations as well. In lieu of any PID response, or any visual or olfactory evidence of contamination, Stone will collect and submit soil samples for VOC analysis; the text has been updated to reflect this.

Comment 2. “Pages 26 and 27: In areas where there is no perceived contamination, at what interval will samples be collected? Given that VOCs and dioxins behave quite differently, please discuss what considerations will be given to the sample depth based on the particular contaminant of concern.”

Response. In the absence of perceived contamination (no elevated PID readings or visual or olfactory evidence of contamination), subsurface soil samples for VOCs will be collected at the water table interface. Subsurface soil samples for dioxin/furan analysis (IP-05 and IP-06) will be collected at or immediately beneath the potential source zone (beneath the wastewater conveyance piping for IP-05 and from 1 – 2 feet below the surface of the emergency lagoon). Text has been updated accordingly.

Comment 3. “Table 7: The contaminants of concern for the RECs listed in Table 7 do not match what is included in Table 1 for IP-02, 03, 07, 12, 13, and 15. Please reconcile.”

Response. For RECs 3 & 4, dioxins/furans and PCBs are being targeted in soils only at potential direct release to soil source areas (i.e. IP-05 and IP-06 locations), therefore, they are not included in the sample analyses for IP-02, IP-03, and IP-07. Dioxins/furans and PCBs have been removed from the COC list in Table 7 for REC 8. For RECs 9 and 10, subsurface soil samples have been added for PCBs and PFAS at IP-12 and IP-13. IP-15 is adjacent to an active septic leach field, so subsurface soil sampling COCs are being screened for VOCs, SVOCs and metals to screen if a release has occurred. IP-14 is being used as a screening tool only for stressed vegetation (grass), so COCs have been limited to VOCs, SVOCs and metals. PFAS were inadvertently left off of IP-09 and IP-10 in Table 8 for groundwater samples, and has been added in.

Comments received from Mr. Shawn Donovan, VT DEC, June 24, 2019

Comment 1. Page 17. Table 7. REC 12 “Why limit VOCs and metals as contaminants of concern related to this REC?

Response

LE Environmental, in their December 2018 Phase I ESA, identified VOCs and metals as potential contaminants of concern from the adjacent and potentially upgradient property where The Book Press, a printing press shop, operated beginning in the 1950s and ceased operation in 2000. Primary COCs from printing operations include ink constituents and printing plate making materials, including alcohols, VOCs (ketones (including methyl ethyl ketone), perchloroethylene, dichloromethane, etc.) and metals (primarily metal salts).

Additionally, an investigation of soils was performed due to a potential UST releases at The Book Press property identified during removal of 5 USTs; a 1,000 gallon gasoline UST and a 500-gallon naptha UST were identified as leaking. A follow-up site investigation, including subsurface soil screening and sampling, did not indicate any petroleum products remained, however, the on-site monitoring well near the former tanks was not sampled. Note that no VOCs were detected in a groundwater sample collected from well MW-9, located near the southwest corner of the Site property, potentially downgradient of The Book Press property, in 1994.

It is Stone’s opinion that analyzing a groundwater sample from proposed investigation point IP-16 for VOCs and metals will satisfy initial investigation into this REC.

Comment 2. Page 20, Section 4, 1st paragraph. “December 2018”

Response: Date has been corrected.

Section 4.1, Page 20, 2nd paragraph, 3rd sentence. “Which existing wells were identified during the January 25th site visit?”

Response: Stone “observed” some wells in the former UST area, but did not positively identify them. Stone will attempt to do so during the initial site reconnaissance.

Comment 3. Page 21, Section 4.3, 3rd sentence. “Will these samples be collected from spigot/port at the building?”

Response. Samples will be collected from a spigot or port at the building, nearest the water line entrance to the building. The text has been modified accordingly.

Comment 4. Page 21, Section 4.3, 4th sentence. “Technical questions: can you collect groundwater samples via low-flow methodology using a screen point sampler?”

Response. It can be difficult due to slow recovery and silt clogging the screen point which can lead to delays and standby charges from the drilling contractor, but samples can be pulled from depth with a bladder pump. As an alternative, and discussed with Robert Reinhart of EPA on Friday, July 12, one or one and one-half inch screened PVC wells can be installed, with sand installed in the annulus to above the screened section and a bentonite seal installed above that, then sampled via low-flow techniques. This process would mimic the process using a screen point sampler, but would allow for the driller to continue on to the next investigation locations while the groundwater sample is collected. There will be some added driller costs for temporary well material, but this will lessen the risk of other charges due to delays being borne by the project. The text has been updated to reflect this change.

Comment 5. Section 4.4. “SPLP analysis??

Response. Stone will perform a Synthetic Precipitation Leaching Procedure (SPLP) on the lagoon sludge sample. The extract will be analyzed for PFAS and then undergo a Total Oxidizable Precursor (TOP) Assay procedure to biotransform PFAS precursors, and then be analyzed for PFAS.

Comment 6. Section 4.5. “FYI, it is anticipated that the revised IRule and GW Protection Rule, which are currently under review by legislative committee, will be adopted by the time we get analytical data.”

Response. The revised IRule went into effect on July 6, 2019. Stone will reevaluate screening values and detection limits prior to sample analysis.

Comment 7. “As I understand it, the State Brownfields Program committed $50k and the Town of Brattleboro has committed $20k; need to discuss where additional funds will come from.”

Response. Stone is aware of the current funding shortfall, which is being increased to address EPA and VT DEC comments on the SSQAPP. Stone has reached out to Windham Regional Planning Commission (Susan Westra), who indicated on July 12, 2019 that she will present this in a Brownfields meeting on July 19, 2019 and does not see any reason why it would not be approved. Scope for this Phase II ESA will need to be reduced if additional funds are not allocated to the project.

Comment 8. Page 31, Section 5.4. “SPLP analysis?”

Response. See response to previous comment above regarding SPLP analysis on wastewater treatment lagoon sludge.