

September 26, 2011

Mr. Nick Warner
City of Burlington – Community Economic Development Office
Room 32 - City Hall
149 Church Street
Burlington VT 05401

Re: Moran Plant/Center, Waterfront North, Burlington Vermont
SMS # 2005-3357

Corrective Action Plan Approval

Dear Mr. Warner:

The Vermont Department of Environmental Conservation Sites Management Section (SMS) has reviewed the Moran Center & Waterfront North, Corrective Action Plan (CAP) presented, by Waite Environmental Management, LLC., the consultant for the City of Burlington for redevelopment activities in the former Moran Plant parcel. The CAP presents reasonable measures to control direct contact with contaminated surface soils. The measures presented in the CAP meet the Title 10, Chapter 159, 10 V.S.A. § 6648 Corrective Action Plan objectives, ensuring technical feasibility, an effective engineering design, reasonable costs, protection of human health and the environment, and compliance with the remediation standards.

The corrective action plan activities as described, will not cause, contribute to, or worsen any release or threatened release of hazardous materials. Those areas of the property that will not be completely abated do not and will not pose an unacceptable risk to human health and the environment and are in compliance with remediation standards.

The Vermont Department of Environmental Conservation (VTDEC) and the City of Burlington are providing notice to the public by publishing notice in The Burlington Free Press and by providing written notice to the Town Clerk. We ask that you post this Notice in a location conspicuous to the public. The VTDEC shall review any public comment submitted prior to implementation of the corrective action plan.

The proposed abatement involves a combination of institutional controls, and excavation and capping of onsite soils. The attached Executive Summary presents the general description of the corrective actions. The attached summary of the previous investigation efforts, presents a general summary of the conditions known at the site.

Objectives of the CAP:

- To address those areas of concern, identified by exceedences of Residential EPA RSLs in soils, VTDOH and site specific VTDEC guidance on Arsenic in soils, and by Vermont Groundwater Enforcement Standards, as well as other pertinent federal and state guidance.
- To build a constructed and continuous barrier that will deter direct contact with potentially contaminated soil, and allow use of the Waterfront North/Moran Center area for recreational activity.
- To control potential infiltration of surface runoff through suspected areas of remnant contaminated soil.
- To establish engineered and institutional controls and barriers that will suitably manage exposure risks, to below 2011 residential EPA risk screening levels in soils.
- To install soil vapor intrusion control measures that will be shown to impede the impact of external soil contaminants into the habitable Moran Plant building envelope.
- To properly manage any construction excavation dewatering discharges
- To control erosion and surface water impact at the offsite temporary excavated soil storage facility

To meet all applicable federal and state environmental remediation goals for the known environmental impacts

Under separate cover you will receive the full text of the CAP, which we ask you offer to the interested public for review.

Any public comments should be directed to my attention at the address above on this letterhead. The Public Comment Period shall close no later than October 17, 2011. The City of Burlington, upon receiving the approval of the Corrective Action Plan, shall file the notice of approval in the land records within 15 days of receipt of said approval.



The SMS requests that all submissions be made with an accompanying full electronic file submission. This may be accomplished by sending a “text searchable” portable document format (pdf) disc, or by uploading the files to our FTP server. Scanned files are acceptable. We wish to help make this process as effective and uncomplicated as possible. Please call with any questions you may have. I can be reached at (802) 241-3892.

Sincerely,



Hugo Martínez Cazón, P.E.
Environmental Analyst

CC: Charles Willette

Burlington Electric Department

John Tedesco

Green Mountain Power