Environmental Site Assessment and Remedial Planning for 19 Bennett Drive, Brattleboro, Vermont

STONE ENVIRONMENTAL
100% EMPLOYEE-OWNED

Services / Expertise
VT Brownfields Reuse and Environmental Liability Limitation Act (BRELLA)
Phase I ESA ASTM E1527-27
Phase II ESA ASTM E1903-11
Risk-based Cleanup and Disposal Plan
Toxic Substances Control Act (TSCA)
Remedial Action Planning (ECAA)
Corrective Action Plan (CAP)

Markets
State Government
Commercial Property Owner

Project Location
Brattleboro, Vermont

Date Completed
2010–2012; 2018–2021

Project Owner
Peter Cooper-Ellis/Coop Hill, LLC

Project ID#
16-047

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Record Concrete, Inc.
US Ecology, Inc.
Witch Enterprises, Inc.

The exterior of 19 Bennett Drive, which has seen 55 years of industrial use.

IN 2010, Stone was retained by the Vermont Department of Environmental Conservation's Brownfields Response Program and Coop Hill, LLC to perform a Phase I/II Environmental Site Assessment (ESA) of an unused site in Brattleboro, Vermont. Since development in the 1960s, the site's been used as a trucking warehouse, truck maintenance facility, newspaper distributor, and printing facility. Past practices at the site, specifically the use of polychlorinated biphenyls (PCBs)-containing printing inks, resulted in PCBs in the concrete slab at concentrations requiring remedial action.

Stone identified three recognized environmental conditions (RECs) during the initial Phase II ESA, warranting corrective actions, including the presence of PCBs in the interior concrete slab of the building and in sludge within the interior/exterior floor drain system. We also detected benzene at a concentration of 12 micrograms per liter in a groundwater sample collected from a monitoring well, exceeding the Vermont Groundwater Enforcement Standard of 4 micrograms per liter.

In 2018, Stone performed a supplemental Phase II ESA that included soil borings along the exterior floor drain system. Results indicated that the total PCB concentration in subsurface soils is above the residential Vermont Soil Standard, warranting a land use restriction at the site. Subsequently, we developed a Corrective Action Plan (CAP) and Risk Based Cleanup Plan to specify actions necessary to prevent exposing site users to PCBs in the concrete floor slab of the site building and to close the remaining portions of the floor drain system. Additional corrective actions included removing concrete in the warehouse, installing a concrete cap over the existing floor slab in the maintenance bay, establishing institutional control on the site (in the form of a deed restriction) to prevent risk of PCB exposure from remaining subsurface soils below the concrete cap in the maintenance bay and along the exterior floor drain system, and performing long term monitoring and maintenance of the concrete cap over the maintenance bay floor slab.

Following regulatory review and acceptance, the CAP was implemented in winter of 2021. Long term monitoring and annual inspections of the concrete cap in the maintenance bay will be held in perpetuity. Additional cleanup measures for the warehouse space are being evaluated including solvent extraction of PCBs.