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Waste Management and Prevention Division
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April 29, 2021

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

RE: Comments on Former Chemfab 2020 Annual Monitoring Report: Corrective Action Areas-Operable Unit B Report, Prepared by Barr Engineering, North Bennington and 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 March 2021 report titled, “2020 Annual Monitoring Report: Corrective Action Areas-Operable Unit B, North Bennington and Bennington, Vermont”. Overall, Barr has done an excellent job summarizing the activities that occurred at this site in 2020. After a detailed review of this report, the SMS offers the following limited comments on the report:

- Section 1.2 Implementation Overview and Report Organization
 - Sections Bottled Water (Attachment C), POET Operation, Maintenance, and Monitoring (OM&M) (Attachment D), and Long-Term Monitoring (LTM) of Drinking-Water Wells (Attachment E)

Please include in each of these subsections the status of this work at the end of 2020 which will be carried forward into 2021.

- Attachment F: Long-Term Monitored Natural Attenuation for PFAS in Groundwater and Soil
 - Table F4 - 2021 MNA Wells

Would Saint-Gobain be willing to enter into discussions to replace several wells in the MNA sampling program with area-wide springs or shallow wells. Wells to be removed



might be an on-facility well at both facilities (Water Street and Northside Drive) and/or drinking water wells that are non-detect and sampling locations to be added might include springs around the site that have historically been contaminated. VTDEC believes that by switching these sampling locations a better understanding of long-term contaminant trends of the shallow aquifer could be obtained, thereby making decisions to modify future sampling locations/frequency can be better made. Should Saint-Gobain be open to this idea, we can discuss this option on our monthly call.

Other than the two issues raised above, VTDEC has no additional comments on the Annual Report. Please have Barr update the 2020 report with this one minor modifications to the report. Should you have any questions with the content of this letter, please feel free to contact John Schmeltzer or me.

Sincerely,



Richard Spiese, Project Manager
Sites Management Section

Cc: Mary Sands, Barr Engineering
Kirk Moline, CT Male
Kristen Schimpke, Barr Engineering
Gary Remple, Barr Engineering
John Schmeltzer, VT DEC
Chuck Schwer, VT DEC