

State of Vermont
Department of Environmental Conservation
Waste Management and Prevention Division
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August 31, 2016

Edward Canning
Saint-Gobain Performance Plastics
One Sealants Park
Granville, NY 12832

RE: Draft Shallow Soil Sampling Report, Former Chem Fab Site & Surrounding Areas, Prepared by CT Male Assoc., North Bennington, Vermont (SMS Site #20164630)

Dear Mr. Canning:

The Vermont Department of Environmental Conservation, Sites Management Section (SMS) has received and reviewed the July 20, 2016 CT Male Associates DRAFT Shallow Soil Sampling Report, Former Chem Fab Site & Surrounding Areas, Village of North Bennington, prepared for the Saint-Gobain Performance Plastics Site (Chemfab, SMS Site #20164630) located at 1030 Water Street in the Village of North Bennington, Vermont. The DRAFT report presents enough information to conclude that there is not a risk to the public for direct contact with the perfluoro alkyl substances (PFASs) that originated from the former Chemfab facility property. All of the soil results, a total of 145 samples from 40 different locations, were well below the Vermont Soil Screening Value of 300 micrograms per kilogram. (parts per billion). The SMS is willing to accept this report as written, provided that CT Male Associates provide a few additions in an addendum to this report.

The SMS requests that CT Male submit the following information as an addendum to this report:

- As stated in Section 2.2-Data Validation, analytical data will be validated by Environmental Standards of Valley Forge, PA. Once this work is completed the entire validated data package should be submitted to the SMS for review;
- The report discusses the quality control steps taken to show that the quality of the information obtained is accurate. However, CT Male does not discuss the findings of the



Quality Control effort in Section 3.0-Findings. CT Male should prepare a section discussing the findings of the quality control effort;

- The report provides no information (either site-specific or general literature review) nor discussion of background PFASs found in soils. CT Male should either prepare and execute a plan to obtain background soil PFAS concentrations around the Bennington area or review and discuss background PFAS soil concentrations from several peer reviewed articles. This information should be tabulated and compared to the findings of the soils sampling effort reported in this soil sampling report. If a site-specific background study is proposed, then the plan must be submitted to the SMS for review and approval prior to its implementation;
- The addendum to the report should provide more evaluation of the data obtained. This should include an evaluation of the ratios of various analytes aurally and with depth. This evaluation should also include a comparison of PFAS levels with TOC and moisture content. It should also look at PFAS levels in different directions from the former facility (north and south, east and west) to see if there is any difference in PFAS levels based on direction from the former facility;
- Submit all of the data obtained in this report in an excel spreadsheet so that all findings can be evaluated independently if necessary.

Please have CT Male perform the work listed above as an addendum to the DRAFT soils report and submit the addendum to this report for SMS review and final approval. Thank you for your attention to this matter.

Sincerely,



Richard Spiese, Project Manager
Sites Management Section

Cc: Chuck Schwer, Director, WM&PD
Kirk Moline, CT Male