

State of Vermont
Department of Environmental Conservation
Commissioner's Office
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(802) 272-5104
Alyssa.schuren@vermont.gov

March 1, 2016

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

RE: FIRST LETTER: Former ChemFab property, North Bennington (SMS Site #20164630)

Dear Mr. Canning:

This letter is a follow up to our meeting held on February 29, 2016 regarding water contamination near the former Chemfab plant located at 1030 Water Street in North Bennington (the Site). As you are aware, 3 private water supply drinking water wells and two commercial wells were found to contain Perfluorinated compounds (PFCs) at levels above Vermont Department of Health Advisory levels. Based on available information, DEC has determined that you may be responsible for the cleanup of the Site and other actions necessary to protect the public health, welfare, or the environment and any costs DEC incurs for cleanup of the Site and other actions necessary to protect the public health, welfare, or the environment.

At our meeting, we discussed a number of critical steps that need to be taken immediately to address the threat to public health, welfare, and the environment posed by the PFCs contamination and the Site. The State of Vermont will sample all of the potentially contaminated wells and water sources, including the surface waters and sediments, within a 1.5 mile radius of the plant. We have committed to providing bottled water to all residents within this radius, both in the short term (water pick-ups locally) and longer term (delivery directly to the impacted homes and businesses) until we determine all of the impacted water sources. Once the water source has been found to be free of PFCs, we will stop delivering water to these residences.

At this time, we formally request that Saint-Gobain commit to the following:

- Provide reimbursement to the State of Vermont for bottled water costs delivered in the designated 1.5 mile radius upon receipt of an invoice;
- Provide reimbursement to the State of Vermont for the sampling costs of the private water supplies, surface waters and sediments in the designated 1.5 mile radius, including the State's contractor's costs, upon receipt of an invoice;
- Install, maintain, and sample Point of Entry Treatment systems (POETs) on each impacted water supply with concurrence from the owner;
- Retain the services of a Vermont licensed professional engineering firm to evaluate the possibility of connecting each impacted residence or business water supply onto municipal water and submit the results of this evaluation to the Department of Environmental Conservation (DEC);
- If connection to the municipal water supply is possible, obtain all necessary approvals and permits and cover all costs associated with connecting each impacted water supply to the municipal water supply at the owner's request;
- Fund a medical monitoring program, including screening of blood samples, for individuals exposed to an impacted water supply;
- Send the DEC Waste Management and Prevention Division (WMPD) a copy of the Phase 1 Environmental Site Assessment within 5 days of receipt of this letter;
- Within 20 days of receipt of this letter, provide the DEC WMPD with any and all historic information concerning the operations at the former Chemfab plant and Site including (1) any and all information



relating to the use of PFCs, including the quantities, how it was used and possible environmental release pathways (air, water, soil) and (2) any and all waste disposal information from the plant including copies of all hazardous waste manifests;

- Retain the services of a qualified environmental consultant and submit a workplan to investigate the former Chemfab plant and Site within 30 days of receipt of this letter to WMPD for review and approval prior to initiation of onsite work. The workplan must comply with the DEC “Investigation and Remediation of Contaminated Properties Procedure” dated April 5, 2012 (IROCPP);
- Immediately implement the approved workplan and submit the results and findings to WMPD within the timeframe established by the approved workplan;
- Develop a corrective action plan in accordance with the IROCPP to remediate releases of PFCs and submit to WMPD for review and approval within the timeframe established by WMPD;
- Implement an approved corrective action plan and report to WMPD within the timeframe established by the approved corrective action plan; and
- Provide reimbursement to the State of Vermont for all management and oversight costs associated with the investigation and remediation of PFCs contamination and the Site and other actions necessary to protect the public health, welfare, and environment.

The DEC may require additional response actions and other reimbursements and payments as DEC collects new information about the Site and PFCs contamination. Please have your consultant submit the Phase 1 Environmental Site Assessment, historic information, workplan, and all other documents related to the site investigation and remediation to Richard Spiese in the Sites Management Section of the WMPD at richard.spiese@vermont.gov.

I look forward to your response and appreciate your cooperation in this matter. My staff and I look forward to working with you and your environmental consultant on the investigation and remediation of the Site and PFCs contamination in North Bennington.

Please feel free to contact either myself or Chuck Schwer if you have any questions.

Sincerely,

A handwritten signature in blue ink that reads "Alyssa B. Schuren". The signature is written in a cursive style with a large initial 'A'.

Alyssa B. Schuren, Commissioner, DEC

CC: Chuck Schwer, Director of WMPD, DEC
Jen Duggan, General Counsel, Agency of Natural Resources
Stuart Hurd, Town of Bennington