

**Subject:** Fw: FECKERT, DONOVAN; follow up questions  
**From:** Li Shen <lshen@thetfordvt.gov>  
**Date:** 12/2/2024, 3:03 PM  
**To:** Stuart Blood <ssblood@riseup.net>

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**From:** Town Manager <townmanager@thetfordvt.gov>  
**Sent:** Monday, December 2, 2024 2:57 PM  
**To:** Thetford Selectboard <selectboard@thetfordvt.gov>  
**Subject:** Fw: follow up questions

Brian Story

Thetford Town Manager

802.785.2922 x2

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**From:** Fekert, Dennis <Dennis.Fekert@vermont.gov>  
**Sent:** Monday, December 2, 2024 2:55 PM  
**To:** Town Manager <townmanager@thetfordvt.gov>  
**Cc:** Donovan, Shawn <Shawn.Donovan@vermont.gov>; Young, Steven <Steven.Young@vermont.gov>  
**Subject:** follow up questions

Hello Brian,

We've replied to your questions in **green** below. Sorry for the slow reply.

Dennis

Hi Dennis and Shawn,

We have a few more questions, primarily we're looking for any update following the news that GMEDC does not appear to be taking over the property. The following are questions I've received, if you have time we could schedule a phone call or I can wait for your email.

1. I had asked: "ANR has a rule that states '5 years of samples showing contaminants below Ground Water Enforcement Standard, or steadily declining' are required before COMPLETING post-closure care. Does this apply in the case of UVRL and PFAS?" The Solid Waste Program responded, "Yes" and the Legal team responded "No comments."

Is there any change? Since GMEDC has decided not to take ownership of the landfill and there apparently is no other party indicating interest in ownership, who is or will be the party responsible for ongoing maintenance and monitoring? Specifically, what will happen when the Landfill Project Fund is depleted if ownership of the landfill has not been resolved at that time?

Typically, when it comes to PFAS at locations at or below the VGES, if there are 3 concurrent non-detect sampling events then PFAS sampling for that location can cease. As of now the Solid Waste Program manages the closure fund for maintenance and monitoring of the landfill. If the fund is depleted before the landfill can achieve custodial care status, it is an open question how regulation of the facility will continue.

2. Can you explain the process and the timeline for DEC to update the Groundwater Enforcement Standard for PFAS to conform to the EPA standard?

The Vermont Department of Health (DOH) is working on a drinking water health advisory for PFAS. DOH is working with DEC so the health advisory will be concurrent with the VGES. \_

3. What is the process and timeline for the Post Closure Plan? How is it dependent on completion of the BRELLA process?

The understanding that the Solid Waste Program SWP has is that the Brella process is no longer ongoing with the GMEDC decision to not move forward with ownership of the property. However, The State of Vermont DEC previously approved funding for Stone Environmental to complete a PCP/CAP report.-The SWP continues to follow the settlement agreement and post closure plan developed in 2002 and which expired in 2022.

4. Why has the Solid Waste Program discontinued sampling of monitoring wells for which levels of PFAS have exceeded the GWES during the previous 5 years? Specifically, why has sampling of well BR-2 been discontinued? Why has the sampling frequency of BR-3 and MW-101D been reduced? (Table of sampling results is available).

BR-2 has never exceeded the VGES. It was at the VGES of 20 ppt in October 2020. It was sampled 4 times after that, all being non-detect. As stated above, when it comes to PFAS at locations at or below the VGES, if there are 3 concurrent non-detects sampling events PFAS sampling for that location can cease. BR-3 does have 5-years of data and could be reduced as results have been stable and below the VGES, with exception of the statistical outlier in the Phase II study which I think can be explained by the sampler mixing up MW-1 and BR-3 as those wells are right next to each other and MW-1 has never been non-detect outside of that event. BR-3 and MW-101D was missed in Fall 2023 sampling.

2. Since BR-2 is on the opposite and upgradient side of the landfill, in what sense is it redundant to BR-3? Why would the State have required redundant monitoring wells to be installed and why, would redundancy only now be declared, especially with less than five years of PFAS data from BR-2?

They are not redundant. These wells are assessed individually. BR-3 is the well is at the compliance point and important to determine if contaminants are migrating off the property lines.

Brian Story

Thetford Town Manager

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