



State of Vermont
Department of Environmental Conservation
Waste Management and Prevention Division
1 National Life Drive-Davis 1
Montpelier, VT 05620-3704

June 2, 2016

Ms. Karen Burrington
Town Clerk
467 Center Street
Pownal, Vermont 05261

Re: Corrective Action Plan (SMS# 2015-4606)
Pownal Dam, North Pownal

Dear Ms. Burrington,

Remedial activities for the above property have been proposed to mitigate polycyclic aromatic hydrocarbon (PAH) impacted river sediments. This work will be conducted under the supervision of the Department of Environmental Conservation.

Lincoln Applied Geology, the site environmental consultant, has prepared a Corrective Action Plan (CAP) to remediate this contamination. Corrective action will include temporarily stockpiling sediments on site prior to off-site landfill disposal. Our standard practice is to allow public comment prior to implementing the CAP. We request that you provide the opportunity for review at Town Hall.

Please post this letter on the appropriate public notice board(s) for 30 days. I have enclosed a copy of the Corrective Action Plan's Executive Summary. The CAP in its entirety may be viewed at <https://anrweb.vt.gov/DEC/ERT/Hazsites.aspx>.

Questions or comments may be directed to me in writing, by telephone 249-5770, or email matthew.becker@vermont.gov.

Sincerely,

Matthew D. Becker
Environmental Analyst



EXECUTIVE SUMMARY

The Pownal Dam is located in North Pownal, Vermont. The dam supplied power to the former Pownal Tannery, and is currently inactive but has a valid FERC Exemption from Licensing and the corresponding rights and responsibilities under that Exemption. The intake was constructed in 1955 to replace an existing dam intake structure. The Pownal Tannery operated from the 1930s to 1988. It later filed for bankruptcy. With the exception of a landfill located upgradient of the dam, the majority of tannery operations and structures were located downstream of the dam. Lagoons were located further downstream of the former tannery structures. Part of the former Pownal Tannery is listed on the EPA's National Priorities List (NPL), but the dam and hydroelectric works are not listed on any searchable database. The hydro parcel is owned by the Town of Pownal and is a separate parcel from the Pownal Tannery site ("Mill Parcel").

In order to redevelop the dam for power generation, it is necessary to remove approximately 1,500 cubic yards of sediment that has accumulated upstream of the dam. Lincoln Applied Geology (LAG) performed a Phase II Environmental Site Assessment to determine contaminant concentrations in sediments upstream of the dam.

Some polychlorinated biphenyls (PCBs) were detected upstream of the dam, due to an upstream source. However, the PCB concentration in sediments slated for removal did not exceed 1 part per million. Based on concentrations of other contaminants such as polynuclear aromatic hydrocarbons (PAHs) in the sediments to be removed, the sediments cannot be used as clean fill. Moreover, they cannot be permanently stockpiled on the adjacent Pownal Tannery site due to its Superfund status. Therefore the sediment will be temporarily stockpiled and dewatered on the Superfund site, if allowable. After dewatering, the sediment will be shipped to a lined landfill for disposal. This Corrective Action Plan (CAP) describes the details of the planned excavation, and also includes the necessary elements of an Analysis of Brownfields Cleanup Alternatives (ABCA). Work is scheduled to occur in the summer of 2016.

Hoosic River Hydro, LLC, lessee to Town of Pownal, Grantor with respect to a certain grant of environmental restrictions, right of access, and easement to Agency of Natural Resources, Grantee, such easement dated December 3, 2013, and recorded on December 3, 2013 at Book 161, Page 1 of the Pownal, Vermont land records ("Easement"), hereby requests a variance from the restrictions set forth in Paragraphs 2(a), (b), and (d) of the Former Mill Building Area Easement to the extent reasonably necessary to carry out this Corrective Action Plan to completion and take such other measures as are necessary to complete the construction scope of the Pownal Tannery project. Approval of this Corrective Action Plan shall constitute approval of this request for a variance.