



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

August 11, 1998

Mr. George Desch,
Sites Management Section
Waste Management Division
Vermont Department of Environmental Conservation
103 South Main Street/West Building
Waterbury, VT 05671-0404

Re: Contained-In Waste Determination for Additional F032 Media, Windsor School Site, Windsor, Vermont

Dear Mr. Desch:

I am pleased to respond to the letter of June 25, 1998 from Ms. Lynda Provencher of your staff in which she requested EPA's clarification on the applicability of EPA's July 25, 1997, "contained-in" determination for media contaminated with an F032 waste for additional F032 media that was found at the same (Windsor) site. As you explained in the June 25, 1998 letter and in previous correspondences between Vermont and the Environmental Protection Agency (EPA), Vermont has not yet adopted the F032 waste listing in its Hazardous Waste Management Regulations and cannot make a "contained-in" determination for this particular waste as outlined in an EPA OSWER policy letter dated September 15, 1995.

The information provided in the June 25, 1998 letter and from a July 23, 1998 telephone conversation with Mr. Michael Smith of your staff indicated that two additional areas of dioxin contamination were detected as part of a more comprehensive dioxin sampling effort to determine the degree and extent of contamination at the Windsor site. This sampling effort was done in conjunction with the remediation effort of August and September 1997 and the July 25, 1997 EPA determination.

The data indicated that the first contaminated area is located in the southeast portion of the football field. Dioxin concentrations of up to 375 ppt-TEQ (at "DS90") were found in this area. A second contaminated area was found in an area that is located to the east of the baseball field. Dioxin concentrations of up to 775 ppt-TEQ (at "DS31") were found in this second area. The letter indicated that the dioxin concentrations in these two areas were considerably less than what was detected in the remediation of the "hot spot" area in 1997. The source of the dioxin contamination is believed to be from the former State Prison wood treatment operation.



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Based on a review of the information provided, EPA believes that the conditions outlined in the July 25, 1997 "Contained-In Policy Determination" apply to the two newly discovered locations. A separate contained-in policy determination will not be necessary at this time.

If you should have any questions concerning the contents of this letter, please do not hesitate to contact Stephen Yee of the Hazardous Waste Program Unit at (617) 565-3550 or me at (617) 565-3559.

Sincerely,



Kevin McSweeney, Associate Director
Waste Policy
Office of Ecosystem Protection

cc: Michael Smith, VTDEC
Peter Marshall, VTDEC
Lynne Hamjian, EPA
Matt Hoagland, EPA
Gary Gosbee, EPA
Sharon Leitch, EPA
Ken Rota, EPA