

**PROPOSED CHANGE IN
GROUND-WATER CLASSIFICATION
HAMDEN AND
NEW HAVEN, CONNECTICUT**

Prepared For:

South Central Connecticut Regional Water Authority
and
Olin Corporation

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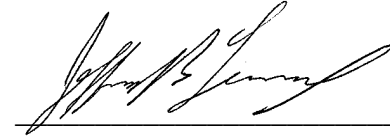
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1.0 INTRODUCTION

On behalf of the South Central Connecticut Regional Water Authority (RWA) and the Olin Corporation (Olin), Leggette, Brashears & Graham, Inc. (LBG) is submitting this application to change the Ground-Water Quality Classification from GAA-impaired to GB for an area located in the southern portion of Hamden and northern portion of New Haven, Connecticut (figure 1). The proposed groundwater reclassification area (PGRA) is an approximately 199 acre area in which portions historically consisted of wetlands and low-lying areas that were filled with household, construction and industrial waste from the late 1800s through the mid 1900s. Included in the PGRA is a portion of south Hamden also known as the Newhall Neighborhood. The Newhall Neighborhood is the primary area which has been subject to the historical filling activities and is identified in Connecticut Department of Environmental Protection (CTDEP) Order SRD-128.

The following application was developed using the CTDEP Draft August 2007 “Guidance for Submission of Applications to Lower Ground Water Quality Classifications to Class GB, as Provided for in the Ground Water Quality Standards.”

2.0 REGULATORY STATUS OF THE NEWHALL NEIGHBORHOOD

The Commissioner of the CTDEP issued Order SRD-128 on July 10, 2001 to Town of Hamden, RWA, Olin, and the State Board of Education (Respondents). The order required that the Respondents investigate and remediate sources of pollution on a “Site” situated in Hamden, Connecticut and known as the Hamden Middle School, Newhall Street School (also known as the Hamden Community Center), two Hamden Housing Authority Properties on Morse Street, Rochford Field, Mill Rock Park (also known as Rochford Field Annex) and the sewage pump station, located at 1099 Winchester Avenue (“the Public Properties”) and certain privately owned properties in the vicinity of the Public Properties, where wetlands formerly existed or where waste materials were historically placed (plate 1). Collectively these areas are referred to as Consent Order Boundary (COB). Order SRD-128 was appealed by all parties, which resulted in

the Order SRD-128 (same number as original order) being accepted as a final decision on April 16, 2003.

The area within the COB is approximately 35 acres, and includes 303 private properties (mostly residential), the former Hamden Middle School, portions of the Newhall Community Center, two Hamden Housing Authority residential properties, a sewer pump station, and two Town parks, Rochford Field and Mill Rock Park.

The following individuals can be contacted for information about the project:

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3.0 DESCRIPTION OF THE PROPOSED RECLASSIFICATION AREA

The existing groundwater classification GAA/GB boundary is within close proximity to the COB and is located in the southern part of Hamden and northern part of New Haven, Connecticut. The approximate western limit of the existing boundary corresponds with Hamden Park Drive; and extends from the intersection of Hamden Park Drive and Morse Street southwest to the approximate intersection of Prospect Street and Huntington Street; the boundary then extends to the north to a point 450 feet east of the intersection of Mill Rock Road and Prospect Street (figure 1).

The PGRA is approximately 159 acres within the Town of Hamden and approximately 40 acres in the northern end of New Haven. The approximate 199 acre PGRA extends from the existing GAA/GB boundary to the north, ending approximately at Mill Rock Road and northern property boundary of the former Hamden Middle School Site (figure 1 and Plate 1). The PGRA has a current groundwater classification of GAA-impaired.

The extent of the PGRA was determined after review of ground-water flow within the Newhall Neighborhood. All the ground water within the PGRA flows towards the existing GB/GAA boundary.

4.0 REGULATORY FRAMEWORK

The Groundwater Quality Standards (GWQS), dated April 12, 1996, set overall CTDEP policy for management of water quality in accordance with the directive of Section 22a-426 of the Connecticut General Statutes. Subparagraph GW8 of the GWQS outlines the procedure to lower the ground-water classification to GB. Subparagraph GW8 states:

“(A) The Commissioner may consider an application to lower a ground-water Classification to GB. Such application shall be subject to the public participation requirements of Section 22a-426 of the General Statutes and shall:

- (i) describe the nature and extent and date of commencement of pollution of the ground-water proposed to be reclassified,
 - (ii) identify all sources of drinking water in the area whose ground-water is proposed to be reclassified and identify all existing uses of ground-water within and down gradient of such area,
 - (iii) assess the potential of the subject area to produce ground-water in an amount suitable for a public water supply,
 - (iv) describe all past and present land uses in the subject area with dates, and
 - (v) provide such other information the Commissioner may reasonably require to determine the most appropriate ground-water classification.
- (B) A ground-water classification shall not be lowered to GB unless the applicant has satisfactorily demonstrated that; any person within or down gradient of the area to be reclassified and extending to an area previously classified as GB or to a surface water body to which the ground-water discharges will be provided with an adequate public water supply, and that lowering of a ground-water classification will not prevent attainment of adjacent surface water quality goals or present unacceptable health risks, and

- (i) that the ground-water to be reclassified is polluted as a result of intense urban, commercial, or industrial development which occurred prior to 1981, and the hydrologic conditions of the subject area are not suitable for the development of a significant public water supply, or
- (ii) the ground-water proposed to be reclassified is polluted and remediation of such ground-water to a quality suitable for drinking without treatment is not technically practicable, or
- (iii) there is an overriding social or economic justification for reclassifying the ground-water to GB and the proposed reclassification is supported by the affected municipality or municipalities, as affirmed, in writing, by the chief executive officer(s) of the municipality or municipalities. For the purpose of this Standard an “affected municipality” is one in which ground-water classifications are to be altered, “social justification” means a specific social need of the affected municipality or the state and “economic justification” means avoidance of an economic impact that would substantially impair or otherwise detrimentally affect the economy of the community or the state. The applicant must also demonstrate that the purposes for the reclassification will not result in development that is inconsistent with the State Policies Plan for Conservation and Development as adopted pursuant to Section 16a-30 of the General Statutes.”

Earlier watershed mapping by CTDEP in the 1980s assumed that the ground water in the area of the PGRA, now known to contain waste fill, was part of the Lake Whitney drainage basin and contributed base flow to that public water supply reservoir. As such, the ground-water in the drainage basin was classified GAA. Ground-water investigations completed as part of Order SRD-128 have shown that the direction of ground-water flow beneath the PGRA is towards the west and southwest, away from the Lake Whitney watershed. The original drainage basin boundaries were established based upon the interpretation of topographic maps. The drainage basin can now be refined utilizing the ground-water elevations and flow described in this application.

5.0 PAST AND PRESENT LAND USES OF THE PGRA

5.1 Past Land Use

Prior to development, the PGRA included a network of watercourses and low lying wetlands. In 1850, much of the area was utilized for farming and residential purposes. By 1924, residential development throughout the PGRA increased, and the Newhall Street Public School (also known as the Hamden Community Center) was constructed. In 1925, Albertus Magnus College was founded on a former estate South of Goodrich Street, between Prospect Street and Winchester Avenue. The college continued to expand, eventually including the entire block. In 1933, the majority of the developed properties within the PGRA were residential except for:

- A machine shop near 327 Goodrich,
- F.R. Cable at 47 Alling Street,
- An auto body shop at 368 Morse Street,
- The Harry Hall Co. Organ Building at 375 Morse Street,
- A bowling alley near 385 Morse Street,
- The Newhall Street Public School at the northwest corner of Morse Street and Newhall Street.
- A business known as VRC at 1036 Winchester Avenue

Residential development continued during the 1930s and 1940s until all blocks in the PGRA had some development. Rochford Field was completed in 1939, and Mill Rock Park was completed in 1941.

Development in the 1950s included:

- The former Hamden Middle School building built in 1956,
- The SNET Garage and Service facility located at 325 Morse Street (currently AT&T) built in approximately 1956, and
- The commercial/industrial buildings along Columbus Street.

There have been no significant changes in the land use within the PGRA since the 1960s, except the construction of what is now the High Precision manufacturing facility at 375 Morse

Street, and the closure of the former Hamden Middle School. The former Hamden Middle School is currently used as a police substation.

5.2 Historic Filling Activities

The following, which is identified in Order SRD-128, documents approximate dates and purposes of the historical filling activities within the COB:

“Historically, and continuing well into the mid to late 1900s, it was a well accepted and customary practice throughout the state to eliminate wetlands and low lying areas which were considered to be mosquito breeding areas in order to protect public from the ills of mosquito borne diseases (e.g., malaria, yellow fever). To that end, public health officials encouraged the filling of wetlands and low lying areas to protect the public health and safety. In the first half of last century substantial portions of this Site contained wetlands and low lying areas.

From as early as 1915, Hamden public health officials solicited owners of such properties containing wetlands and low lying areas to allow refuse to be dumped on these properties. In some instances the town would operate public dumps on these properties and when filled and the public health concerns eliminated, the properties would be developed by the owners. Review of historical records shows that some time prior to 1917 the Town of Hamden had established public dumps between Goodrich Street and Morse Street, an area located in the western portion of the Non-Public Properties. Historical records also show that the Town of Hamden established other public dumps in the area of the Site where Rochford Field and Mill Rock Park are currently located. From at least the mid 1920s to late 1930s two dumps were established in this area and were referred to as the Newhall Street Dump and the Mill Rock Dump. It appears that the Newhall Street Dump closed and Rochford Field was established on at least part of that dump in the late 1930s. The Mill Rock Dump was active until at least 1939 and portions of it were developed as a park in the early 1940s.

Sometime prior to 1934, the New Haven Water Company entered into an agreement with Winchester Repeating Arms Company whereby Winchester Repeating Arms Company was given use of what is currently known as the Hamden Middle School Property for dumping purposes. From at least 1933 respondent Olin Corporation and its predecessors continued the practice of the dumping ash and other waste at the Hamden Middle School Property as fill with

the permission of the New Haven Water Company. Respondent Olin also used public dumps established by the Town of Hamden on the Public and Non-Public Properties to discard ash and other manufacturing wastes generated at its plant on Winchester Avenue in New Haven.”

By 1963, all filling in the Newhall Neighborhood was completed, with the exception of the former Hamden Middle School site, where dumping occurred as late as July 1971.

5.3 Current Land Use

The current land use within the PGRA is primarily residential, and includes industrial, commercial, municipal, educational and vacant land. The municipal lands include the former Hamden Middle School, the Hamden Community Center, Mill Rock Park and Rochford Field. The educational land use is the Albertus Magnus College.

6.0 NATURE AND EXTENT OF POLLUTION

From the 1979 until the present, several environmental investigations were completed at the former Middle School Site. Environmental investigations within the remainder of the COB and outlining areas generally commenced in 2000. Environmental investigations were completed by the CTDEP, United States Environmental Protection Agency (USEPA), property owners and responsible parties (as identified in Order SRD-128). These extensive investigations characterized the extent and quality of historic fill, and ground-water quality throughout the PGRA.

6.1 Fill Extent and Quality

The fill identified within the PGRA contains industrial, construction and domestic wastes. As shown on figure 2, the historic fill areas are located west of Wadsworth Street and Prospect Lane. The thickness of the fill present is generally less than 15 feet, with thicker areas of fill identified within and southwest of the former Middle School Site, and between Butler Street and St Mary Street.

The primary contaminants of concern detected within the fill include metals (primarily arsenic and lead), polynuclear aromatic hydrocarbons (PAHs) and petroleum hydrocarbons.

Additional contaminants detected, though less frequently, include volatile organic compounds (VOCs), polychlorinated biphenyls (PCBs), and pesticides.

6.2 Ground-Water Quality

Plate 1 show the locations in which ground water has been sampled throughout the PGRA. Tables summarizing ground-water quality analytical results are presented in Appendix I. As shown, extensive testing has been completed the area. The contaminants of concern identified in the ground water within the PGRA include PAHs, petroleum hydrocarbons, metals, and VOCs, and these contaminants of concern were detected at concentrations exceeding the CTDEP Remediation Standard Regulation (RSR) Groundwater Protection Criteria (GWPC). In addition, VOCs have been detected at, and southwest of the former Hamden Middle School Site at concentrations exceeding the CTDEP RSR Residential Volatilization Criteria (RVC).

6.3 Surface Water

The mechanism by which surface water could be impacted by site contaminants is through the migration of contaminated ground-water to a surface water body. The ground water beneath the PGRA flows toward the west and southwest (away from Lake Whitney, a public water supply reservoir). The nearest hydraulically downgradient surface water bodies are Beaver Ponds, which are located approximately 2,000 feet southwest from the PGRA. Arsenic was detected above the RSR Surface Water Protection Criteria (SWPC) in one of the wells at the hydraulic downgradient portion of the PGRA. The detection exceeded the criteria by less than 2 parts per billion. By the time the ground water migrates the approximate 2,000 feet to the surface water body, we would anticipate the concentration of arsenic would be below the SWPC as a result of attenuation, diffusion and dispersion. No other constituents were detected above the SWPC along the hydraulic downgradient compliance portion of the PGRA.

7.0 SOURCES OF DRINKING WATER AND USES OF GROUND-WATER

All properties within the PGRA and the 500 foot buffer area (area designated Groundwater Class GAA within 500 feet of PGRA) were evaluated to determine the current sources of drinking water and to determine the existence of ground-water wells that could be

used for drinking. Appendix II includes a list of all parcels within the PGRA and buffer area, status of property, and any water supply information.

A total of 558 unique parcels were identified within the PGRA, including 478 parcels in the Town of Hamden and 80 parcels in the City of New Haven. 126 parcels were identified within the 500-foot buffer area in the Town of Hamden. In order to determine the current sources of drinking water and to determine the existence of ground water wells in the PGRA and buffer area, LBG reviewed the following sources of information:

- Town of Hamden Tax Assessor files,
- City of New Haven Tax Assessor files,
- South Central Connecticut Regional Water Authority (RWA) customer list,
- Quinnipiack Valley Health District files,
- City of New Haven Health Department files, and
- The Connecticut Department of Consumer Protection well permits.

The Tax Assessor field cards were reviewed for each parcel within the PGRA and the buffer area. A Tax Assessor field card (also known as property card or data sheet) displays the information the Assessor's office has about a property including the source of potable water or the presence of a well. The Tax Assessor field cards showed public utilities available for all parcels within the PGRA, and no domestic water wells were recorded. The Tax Assessor field cards showed wells on six properties on Deepwood Drive in the buffer area (Appendix III). These properties are located approximately 400 feet north of the PGRA.

The list of parcels within the PGRA and the buffer area were also compared with the RWA customer list. Twenty seven (27) parcels were identified without public water service; of which, eight (8) parcels are billed for their water service from an adjacent property, and nineteen (19) parcels are vacant.

The Quinnipiack Valley Health District and City of New Haven Health Department files were reviewed for any information or permits regarding domestic water wells within the PGRA. This review found no water well permits in the PGRA or the buffer area.

The Connecticut Department of Consumer Protection Well Drilling Permits was reviewed for any information or permits regarding domestic water wells within the PGRA and the buffer area. This review found no records of any wells in the PGRA or the buffer area.

All properties within the PGRA and the 500-foot buffer area obtain their water from the municipal water supply or, in the cases of vacant land, have access to municipal water. No drinking water wells were identified within the PGRA; however, the tax cards for six properties within the 500-foot buffer area on Deepwood Drive were identified to have wells. The properties are located approximately 400 feet north of the PGRA and all these properties are customers of RWA. LBG was successful in contacting two of the six property owners (120 and 145 Deep Wood Drive); the owners verified that a well is not known to be on their properties and their sole sources of water were from the public water supply system. The remaining five properties are connected to public water system based upon the file review described earlier.

8.0 POTENTIAL OF THE SUBJECT AREA TO PRODUCE GROUND WATER

LBG reviewed the 1979 United States Geological Survey and CTDEP “Connecticut Water Resources Bulletin Part 8 Quinnipiac River Basin” (ref. 1) in order to assess the potential of the PGRA to produce ground-water in an amount suitable for a public water supply. The approximate 61 acres of the PGRA located approximately east of Wadsworth Street is indentified as till. Till is composed of a densely-packed, poorly-sorted mixture of stones, gravel, sand, silt and clay. It is not considered a primary water-bearing deposit because of its poorly-sorted texture and low permeability.

The approximate 138 acres of unconsolidated materials located approximately west of Wadsworth Street are identified as coarse grained stratified drift overlying fine grained stratified drift. The stratified drift materials are reported to consist principally of fine to coarse sand, 10 to 30 feet thick, overlying significant thicknesses of clay, silt and very fine sand. The materials mapped on the central and eastern portions of the PGRA are similar to those mapped for the southern and western hydraulically downgradient and abutting existing GB ground-water classification area. The water-bearing and water-yield properties of stratified drift aquifers vary from excellent to poor. These characteristics depend largely upon the relative amounts of fine-grained versus coarse-grained interbeds the material contains, and their stratigraphic

position, and proximity and hydraulic connection to surface-water bodies. These coarser grained materials were identified during the environmental investigations completed in this area to often be overlain by finer grained organic materials, which are remnants of the wetlands and watercourses deposits which previously dominated this area. Although no production wells were identified within ¼-mile of the PGRA, wells located in the general area that are screened within the coarse-grained materials are reported to have potential yields between 50 to 500 gpm (gallons per minute), with highest yields obtained from the thickest most transmissive areas; especially those near streams.

The PGRA is in a densely developed urban area and is completely serviced by municipal water. The dense urban setting likely has a high quantity of aging residential heating oil storage tanks, and contains industrial and commercial operations. While the stratified drift aquifer in the central and eastern portion of the PGRA would likely support a community system well, the dense urban setting is not a reliable groundwater source because of the constant threat of contamination.

The long-term average annual precipitation for Hamden is approximately 48 inches (as reported at nearby Mt. Carmel gage). Typically, approximately half of this precipitation results in recharge to ground water, with less than that amount occurring in areas containing a greater percentage of impervious cover, such as the case with the PGRA. Using a conservative estimate of 24 inches of recharge to the stratified drift aquifer, this would result in a theoretical potential yield of 169 gpm. The actual sustainable yield would be less than this theoretical yield because the area of contribution for any potable supply well would not include all of the stratified drift in the PGRA. There are no surface-water bodies in close proximity of the stratified drift aquifer in the PGRA to act as a secondary source of recharge, and, therefore, during periods of drought, the sustainable yield would additionally be reduced. While the stratified drift aquifer may be able to support a yield greater than 100 gpm, a well in the range of 100 to 150 gpm is much smaller than existing wells in the RWA's water system. Concerns related to the dense urban setting also make this an unappealing area as a source of potable water.

The PGRA has not been identified by RWA in their master plan and water-supply plan as potential water source, and RWA has no plans of developing a source well within the PGRA.

9.0 NOTIFICATION LETTERS TO MUNICIPAL OFFICIALS

Letters notifying the appropriate municipal officials that an application to reclassify the ground-water within the PGRA were sent to the Mayors of the Town of Hamden and the City of New Haven and the Director of the Quinnipiack Valley Health District and the City of New Haven Health Department. Copies of the notification letters are attached in Appendix IV.

10.0 APPLICATION REQUIREMENTS

Below presents a summary of the satisfied base criteria and track (i) criteria requirements identified with the CTDEP Draft August 2007 “Guidance for Submission of Applications to Lower Ground Water Quality Classifications to Class GB, as Provided for in the Ground Water Quality Standards”.

1) Ground water within the PGRA and 500 foot buffer area is not in use as potable supply. Ground water within the PGRA flows towards an adjoining GB ground-water classification area and, therefore, would not be used for potable purposes.

2) Arsenic was the only constituent detected above the CTDEP RSR Surface Water Protection Criteria at the hydraulic downgradient portion of the PGRA. By the time the ground water migrates the approximate 2,000 feet to the surface water body, we would anticipate the concentration of arsenic would be below the SWPC as a result of attenuation, diffusion and dispersion. Lowering the groundwater classification will not relieve the obligation to obtain compliance with this criteria and therefore will not prevent attainment of the surface-water quality goals.

3) Fill and soil quality within the COB has been fully characterized by the responsible parties as required by Order SRD-128. The CTDEP issued a Remedy Selection Plan in October 2007 to address constituents detected above RSR criteria. The responsible parties are currently preparing detailed remedial action plans which will satisfy the CTDEP RSR Direct Exposure Criteria (DEC) and Pollutant Mobility Criteria (PMC). Lowering of the ground water classification will not prevent the attainment of compliance with the DEC (which is unrelated to

the ground-water class) and PMC, and therefore, lowering of the classification will not present unacceptable health risks.

4) Metals, PAHS, VOCs and petroleum hydrocarbons within the PGRA have been shown to exceed the CTDEP RSR Groundwater Protection Criteria. The primary source of the widespread ground-water quality impacts is the widespread historical fill. Remedial actions proposed for the area generally include the removal and/or covering of fill. In addition, VOCs have been detected at, and southwest of the former Hamden Middle School Site above the CTDEP RSR RVC. While the source of the VOCs in groundwater will be addressed through implementation of a focused remedial action; the site-wide remedial actions will likely not result in the attainment of the Groundwater Protection Criteria.

5) Filling within the Newhall Neighborhood initiated in the mid 1800s, with the majority of fill being deposited prior to 1963. This fill is the source of the majority of contamination identified within the COB. Therefore, the cause of the pollution occurred prior to 1981.

6) The public water system is available throughout the PGRA. The stratified drift aquifer in the central and eastern portion of the PGRA would likely support a low yielding community well; however, the dense urban setting is not a reliable groundwater source because of the constant threat of contamination. While the stratified drift aquifer may be able to support a yield somewhat greater than 100 gpm, concerns related to the dense urban setting make this an unappealing area as a source of potable water. Therefore, the PGRA is considered unsuitable for the development of a public water supply source.

Additionally the PGRA has not been identified by RWA in their master plan and water supply plan as a potential water source, and RWA has no plans of developing a source well within the PGRA.

11.0 CONCLUSION

All requirements of the CTDEP August 2007 draft guidance to change the ground-water quality classifications to class GB for the PGRA have been satisfied. Ground water within the PGRA flows towards an existing GB ground-water classification area, and the land use within the PGRA is similar to the land use in the abutting GB ground-water classification area. Change of ground-water quality classification to GB will not create an unacceptable health risk and would likely result in expediting the enactment of remedial actions necessary for the Newhall Neighborhood. Therefore, on behalf of RWA and OLIN, LBG requests that the ground-water classification within the PGRA be changed from GAA-impaired to GB.

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FIGURES