



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



September 26, 2005

Mr. David Silverstone  
Chief Executive Officer  
Regional Water Authority  
90 Sargent Drive  
New Haven, Connecticut 06511-5966

Re: Middle School Site Hamden, Connecticut  
Groundwater Monitoring Requirements

Dear Mr. Silverstone:

The Connecticut Department of Environmental Protection (the Department) conditionally approved documents titled, "Supplemental Scope of Study, Former New Haven Water Company Property, Hamden, Connecticut," dated April 16, 2004, and "Addendum and Modification to Supplemental Scope of Study, Former New Haven Water Company Property, Hamden, Connecticut," dated June 28, 2004 in a Conditional Approval letter dated July 19, 2004. The abovementioned documents were prepared by Leggette, Brashears & Graham, Inc. (LBG) on behalf of the Regional Water Authority (RWA). The Middle School Site (the Site) is an area of investigation currently consisting of the Hamden Middle School and a portion of the Newhall Community Center (also known as Newhall Street School) and two residential properties (249-251 and 253-255 Morse Street). The investigation and remediation of the Middle School Site is being conducted pursuant to Consent Order No. SRD-128.

The Department's Conditional Approval letter required that, "the groundwater samples collected from all new and existing groundwater monitoring wells be analyzed for all contaminants of concern and landfill leachate parameters." Based on the Department's review of the data for the groundwater sampling events conducted in November and December 2004, and May 2005, the groundwater samples were not analyzed for all of the contaminants of concern and landfill leachate parameters. However, the groundwater samples collected from the February 2005 monitoring were analyzed for all contaminants of concern and landfill leachate parameters.

**Department Determinations:**

1. All new and existing groundwater monitoring wells must be analyzed for all contaminants of concern and landfill leachate parameters. The contaminants of concern include:
  - Extractable Total Petroleum Hydrocarbon (ETPH)
  - Volatile Organic Compounds (VOCs)
  - Semi-VOCs (SVOCs)
  - Polychlorinated Biphenyls (PCBs)
  - Pesticides
  - Metals (antimony, arsenic, barium, beryllium, cadmium, copper, chromium, lead, mercury, nickel, selenium, silver and zinc)
  - Cyanide
  - Landfill Leachate (alkalinity, ammonia, iron, manganese, nitrate, potassium, sodium,

- sulfate, sulfide, total dissolved solids, total suspended solids, B.O.D, pH and ORP)
2. All groundwater monitoring wells at the Middle School Site must be analyzed for all contaminants of concern and landfill leachate parameters on a quarterly basis to evaluate seasonal variations.
  3. Groundwater elevations shall be collected at all groundwater monitoring wells.
  4. Where technically feasible the limits of detection must be less than the lowest applicable Regulations of the Connecticut State Agencies, Remediation Standard Regulations (RSRs).
  5. Table 3 titled, "Summary of Ground-Water Analyses" of the *Final Investigation and Remedial Evaluation Report, Former New Haven Water Company Property Hamden, Connecticut* for the Middle School Site, dated March 31, 2005, indicates that groundwater monitoring wells MW-24A & B, MW-26A&B, and MW-27A & B were analyzed for all of the contaminants of concern, rather than VOCs only. This discrepancy in tables should be clarified and corrected for future submittals.
  6. Any modifications to the groundwater monitoring requirements must be submitted to the Department as a formal request under Consent Order No. SRD-128 for review and written approval.

If at any time the Commissioner determines that the actions at the site have not fully characterized the extent and degree of pollution or have not successfully abated or prevented pollution, the Commissioner may institute any proceeding, or take any action to require further investigation or further action to prevent or abate pollution. If you have any questions regarding this matter, please contact me (860) 424-3090.

Sincerely,



Eileen M. Barnes  
Environmental Analyst  
Bureau of Waste Management  
Remediation Section

EMB

G:Hamden/Hamden Middle School/ Groundwater Monitoring Program

cc: Thomas Chaplik, RWA  
Michael Manolakas, LBG  
Jeff Lennox, LBG  
Brian Cutler, Loureiro Engineering Associates, Inc.  
Meg Harvey, DPH  
Public Information Repositories