

**Summary and Response to Public Comments  
Supplemental Scope of Study  
Former New Haven Water Company Property  
Hamden, Connecticut**

**July 16, 2004 (Revised July 21, 2004)**

The Remediation Section of the Bureau of Waste Management asked for public comments on the proposed “Supplemental Scope of Study, Former New Haven Water Company Property, Hamden, Connecticut,” dated April 16, 2004, prepared for the Regional Water Authority (“RWA”) by Leggette, Brashears & Graham, Inc. (“LBG”) and the “Addendum and Modification to “Supplemental Scope of Study, Former New Haven Water Company Property, Hamden, Connecticut,”” dated June 28, 2004, prepared for the RWA by LBG (collectively referred to as the “Work Plan”), between April 27, 2004 and June 1, 2004. The public comment period was extended to July 1, 2004. Two public meetings were held for the public to learn about the proposed Work Plan and ask questions. Copies of the Work Plan were available for public review at the Department of Environmental Protection’s office in Hartford, the Miller Library and the Whitneyville Branch Library in Hamden, and at the project’s website. During this time period, in addition to comments made at the public meetings, the Department received one written comment letter on the proposed Work Plan. The Department’s response to the written public comments is summarized below.

***Comment 1: The “Supplemental Scope of Study, Former New Haven Water Company Property, Hamden, Connecticut,” dated April 16, 2004, is missing a list of references.***

Response 1: DEP requested this missing information, which was provided by LBG in the addendum dated June 28, 2004.

***Comment 2: The Scope included discussion of prior detections of bis (2-ethyl hexyl) phthalate in groundwater samples from the Middle School site. LBG suggests detections were related to the use of latex gloves by field personnel and notes that “the absence of bis (2-ethyl hexyl) phthalate in future sampling rounds would suggest the detections were related to some type of field contamination.” The Scope does not include provisions for retesting groundwater for this compound and eliminates semivolatile organic compounds (SVOCs), including phthalates from further Phase III testing. It is not clear if this “future testing” has been completed or is planned for future sampling. While low levels of bis (2-ethyl hexyl) phthalate could be attributable to sampling or laboratory equipment, bis (2-ethyl hexyl) phthalate in groundwater could be the result of leaching from plastic in the fill materials.***

Response 2: DEP has required that bis (2-ethyl hexyl) phthalate and other semivolatile organic compounds will be retained as contaminants of concern for soil and groundwater testing.

***Comment 3: As part of the Phase III data gap investigation outlined in the Scope, LBG will be excavating additional test pits. In the Scope, LBG proposes to refill test pits with excavated material to depths up to 4 ft. below grade, and thereafter, fill the pits with “clean fill brought from off-site”. LBG does not discuss the proposed disposition of the remaining excavated material from test pits (relative to disposal or storage) or how the “clean fill” will be characterized.***

Response 3: DEP has required that the surplus excavated material from the test pits be properly containerized (placed in containers?) and stored at a secure location acceptable to the Town of Hamden, pending receipt of testing results necessary for off-site disposal. In addition, DEP has required that LBG provide laboratory documentation that certifies that any fill brought onto the Middle School site used to complete backfilling the excavations is “clean”.

***Comment 4: Part of the data gap investigation outlined in the Scope includes additional sampling to assess the extent of the soil cap placed on the Athletic Field. Per the Conceptual Site Model, the cap is of varying thickness (minimum 18 inches gravel, overlain by 6 inches top soil in Athletic Field area). The planned testing includes seven surficial samples, depth 0 to 6 inches below grade along the northern berm to assess the extent of the cap. There is no explanation of the rationale for choosing the shallow depth for the samples if the cap is typically at least 2 ft. thick.***

Response 4: DEP has required sampling greater than 6 inches in depth at these locations. DEP did not specify how deep to sample, but the sampling must be deep enough to identify the extent of any fill that is present and the location of native soils.