



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



CONDITIONAL APPROVAL

July 19, 2004

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

RE: Supplemental Scope of Study  
Former New Haven Water Company Property  
Hamden, Connecticut  
Consent Order No. SRD-128

Dear Mr. Silverstone:

The Remediation Section of the Department of Environmental Protection has reviewed the Work Plan titled, "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 received on April 16, 2004, 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 and received on July 1, 2004 (collectively referred to as the "Work Plan"). The Work Plan was submitted pursuant to paragraph B.3.b of Consent Order No. SRD-128, issued on April 16, 2003.

The Work Plan proposes soil and ground water investigations to be completed at the portion of the Newhall Street Neighborhood site in Hamden occupied by Hamden Middle School, a portion of the Hamden Community Center, and properties located at 249-251 and 253-255 Morse Street.

The Work Plan is hereby approved with the following conditions:

1. Contaminants of Concern. Polychlorinated dibenzodioxins and polychlorinated dibenzofurans must be analyzed in any soil or fill sample for which chlorinated solvents or polychlorinated biphenyls (PCBs) are detected. The complete list of semivolatile organic compounds, including phthalates, must be analyzed. Analysis for metals must include beryllium, selenium and thallium. Asbestos must be analyzed in any sample collected from waste that appears to contain suspect asbestos-containing materials (construction/demolition debris including, but not limited to, roofing, floor tiles, etc.). All contaminants of concern and landfill leachate parameters must be analyzed in groundwater samples collected from all new and existing groundwater monitoring wells.

2. Geophysics. The grid spacing proposed for the ground penetrating radar (GPR) survey is insufficient to identify the presence of metal drums and must be reduced to be appropriate for the identification of objects of this size.
3. Test Pits. Any surplus excavated materials that are not returned to test pit excavations must be properly containerized and stored at a secure location acceptable to the Town of Hamden, pending the results of waste characterization for off-site disposal. Laboratory certification must be provided for any clean backfill brought from off-site that will be used to return the excavations to grade.
4. Soil Borings. The proposed boring frequency along the northern and southern property lines of the Middle School site is insufficient to adequately identify the limits of fill. Additional soil borings are required to better define the horizontal and vertical extent and chemical characteristics of all fill materials. Along the northern boundary of the site, additional borings must be located north and west of LBG-MW-1 and between LBG-MW-1, LBG-TP-3, LBG-TB-24, LBG-MW-13, LBG-TB-20, LBG-MW-2 and LBG-MW-7 to determine the extent of the fill and associated contamination. Along the southwest boundary of the site, additional borings must be located between LBG-TB-31, LBG-MW-15, LBG-MW-4 and LBG-MW-29. At the southeast boundary of the site, additional borings must be located between LBG-MW-6, LBG-TB-30, and LBG-TB-10. Soil borings must be drilled to a depth sufficient to identify the presence of native materials, and appropriate soil samples must be collected to characterize fill and assess potential impacts to underlying native soils.
5. Extent of Soil Cap Placed on the Athletic Field. Deeper soil sampling is required at the sample locations proposed. Soil borings must be drilled to a depth sufficient to identify the presence of native materials, and appropriate soil samples must be collected to characterize fill and assess potential impacts to underlying native soils.
6. Characterization of Halogenated VOCs. During the initial phase of the supplemental investigation, nested shallow and deep ground water monitoring wells must be installed off-site in the vicinity of 331 or 333 Morse Street and 315-317 Morse Street to evaluate the halogenated VOC plume migrating off-site. The proposed locations of additional off-site monitoring wells, if needed, must be submitted to the Department for review and approval.
7. Quality Assurance Project Plan. The Quality Assurance Project Plan (QAPP) lacks sufficient detail and must be revised and submitted for the Department's review and approval prior to initiating field work. The frequency of duplicate sample collection must be at least one duplicate sample per every 20 samples analyzed or one duplicate sample per day, whichever is more frequent. The frequency of field equipment rinsate blanks must be one per day, at minimum. Analysis of trip blanks must be included. An evaluation of laboratory detection limits for all contaminants of concern must be included. Please consult appropriate EPA guidance documents regarding QAPP preparation.

8. Schedule. A detailed schedule that graphically identifies the anticipated timing of all proposed field activities from mobilization through demobilization must be submitted. The schedule must also include the dates of all required reports submitted under this approved Work Plan. In addition, an interim report that includes the results of geophysical and subsurface investigations must be submitted within three (3) months of completion of field activities. The schedule must include submittal of a final investigation report and evaluation of remedial alternatives by March 31, 2005.

Nothing in this approval shall affect the Commissioner's Authority to institute any proceeding, or take any other action to prevent or abate pollution, to recover costs and natural resource damages, and to impose penalties for violations of law including but not limited to violations of any permit issued by the Commissioner. If at any time the Commissioner determines that the approved actions have not fully characterized the extent and degree of pollution, the Commissioner may institute any proceeding, or take any action to require further investigation. This approval relates only to pollution or contamination identified in the above referenced Work Plan.

In addition, nothing in this determination shall relieve any person of his or her obligations under applicable federal, state and local law.

If you have any questions pertaining to this matter, please contact Shannon W. Pociu of my staff at (860) 424-3546.

Sincerely,



Michael Harder  
Acting Bureau Chief  
Bureau of Waste Management

MH:EP:swp

cc: Thomas Chaplik, Regional Water Authority  
Gregory A. Sharp, Murtha Cullina LLP  
Jeff Lennox, Leggette, Brashears & Graham, Inc.  
Michael Manolakas, Leggette, Brashears & Graham, Inc.  
Mayor Carl Amento, Town of Hamden  
Curt Richards, Olin Corporation  
John M. Looney, AAG  
Shannon Pociu, DEP  
Terry Iacone, DEP  
Meg Harvey, DPH  
Elizabeth Hayes, Community Advocate

Sent Certified Mail – Return Receipt Requested

7002 2030 0007 9641 8944