

# LEGGETTE, BRASHEARS & GRAHAM, INC.

## PROFESSIONAL GROUND-WATER AND ENVIRONMENTAL ENGINEERING SERVICES

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August 5, 2004

RECEIVED  
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Waste Management Bureau  
Planning & Standards Division

Ms. Elsie Patton  
Planning and Standards Division  
Bureau of Waste Management  
Connecticut Department of Environmental Protection  
79 Elm Street  
Hartford, CT 06106-5127

RE: Request for Modification to Sampling Plan  
Former New Haven Water Company Property

Dear Ms. Patton:

Thank you for meeting with us on August 4. Based on our discussions, Leggette, Brashears & Graham, Inc. (LBG), on behalf of the South Central Connecticut Regional Water Authority (RWA), requests approval of the following modifications to the sampling plan.

1. Dioxin Analysis in VOC Areas – The CTDEP has requested dioxins and furans be analyzed in any sample that contains chlorinated solvents. As part of the supplemental scope of work, the VOC hot spot identified in the vicinity of MW-7A/B will be characterized. This will potentially involve the collection of several samples to define the extent of the VOCs, more than needed to determine if dioxins and furans are present in the VOCs. Therefore, LBG requests that two samples from two separate borings with the highest detections of VOCs be submitted for analysis of dioxins and furans. This will provide sufficient data to determine if this one VOC area of concern contains these constituents, because while the release mechanism is currently unknown, the occurrence in the one area is mostly likely from a single event/source.
2. Dioxin Analysis in PCB Areas – As above, CTDEP has requested dioxins and furans be analyzed in any sample that contains PCBs. We request that in any one boring, only the sample with the highest PCB detection be analyzed for dioxins and furans. On the horizontal plane, if the PCB detections are few and scattered, then each boring with PCBs would have a sample tested for the compounds. If a unique release area is identified through several detections of PCBs in different borings, the RWA may propose to the CTDEP for a subset to be tested for dioxins and furans, similar to the plan for the known VOC hotspot.

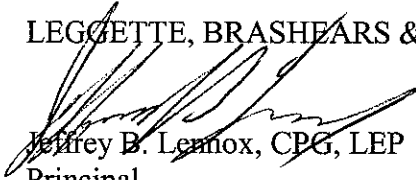


3. Metals – After testing of approximately 102 soils samples, with several samples of all types of fill on the property, total and SPLP thallium has not been detected. It, therefore, is clearly not a contaminant of concern for our site, thus we request it be dropped from future testing. We have similar concerns with respect to beryllium and selenium (not being detected above background levels), but because there are detections, we understand the Department is not in a position to conclude whether those detections are background or not, thus we do not request removal of those metals at this time.
4. Semi-Volatile Organic Compounds – The only non polynuclear aromatic hydrocarbon (PAH) SVOC detected in soils is bis(2-ethylhexyl)phthalate, a common sampling/laboratory artifact. There were 4 detections out of 104 samples. However, it cannot be conclusively determined it is not related to a release on the site. No other non-PAH compounds were detected in the detailed SVOC sampling to date; therefore, we request that the sampling for SVOCs include only PAHs and bis(2-ethylhexyl)phthalate, as we have clearly documented that this will cover all potential semi-volatile contaminants of concern at our site.
5. Limit of Fill Test Borings – The CTDEP requested to better define the limits of fill. LBG will drill borings, 50 feet apart, along lines perpendicular to the currently mapped edge of fill in the identified locations. If any type of fill is evident, no samples will be collected for laboratory analysis (unless a unique field observation is made). At the first boring where there is no visual evidence of fill, it will be subjected to laboratory analysis in accordance the standard soil sampling protocol.

If you have any questions or comments, please do not hesitate to contact me. We understand a technical meeting is being scheduled for Friday, August 13 to address these requests.

Very truly yours,

LEGGETTE, BRASHEARS & GRAHAM, INC.

  
Jeffrey B. Lemox, CPG, LEP  
Principal

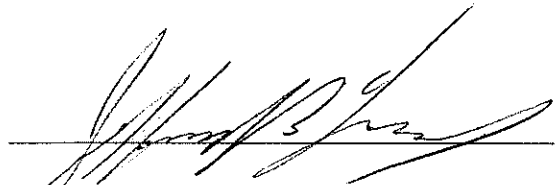
JBL:

cc: T. Chaplik J. Looney  
G. Sharp M. Harvey  
S. Pociu E. Hayes  
C. Amento K. Hood  
C. Richards

“I have personally examined and am familiar with the information submitted in this document and all attachments thereto, and I certify, based on reasonable investigation, including my inquiry of those individuals responsible for obtaining the information, that the submitted information is true, accurate and complete to the best of my knowledge and belief. I understand that any false statement made in the submitted information is punishable as a criminal offense under §53a-157b of the Connecticut General Statutes and any other applicable law.”

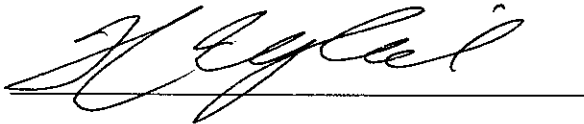
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South Central Connecticut Regional Water Authority  
Thomas V. Chaplik  
Vice President

A handwritten signature in black ink, appearing to read "Jeffrey B. Lennox", is written over a horizontal line.

Leggette, Brashears & Graham, Inc.  
Jeffrey B. Lennox  
Principal

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South Central Connecticut Regional Water Authority  
Thomas V. Chaplik  
Vice President

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Leggette, Brashears & Graham, Inc.  
Jeffrey B. Lennox  
Principal