

29 May 2002
1200320

Mr. Aaron Gilbert, Project Manager
United States Environmental Protection Agency
One Congress Street, Suite 1100 (HBT)
Office of Site Remediation and Restoration
Boston, MA 02114

Re: Century Brass Site
Brass Mill Center Mall
Waterbury, CT

Dear Mr. Gilbert:

We understand the USEPA has recently identified two items related to the remediation of the Mall site completed in 1996. These items are as follows:

- As part of EPAs reassessment to confirm this site remains stabilized (i.e. Human Exposures and GW Releases remain controlled) you wanted to confirm the proposed remediation discussed by the Connecticut Department of Environmental Protection^[1] was completed; and
- You also indicated that the Mall site (the "Conveyed Parcel") is required to go through a formal Public participation process in order to receive final concurrence from the RCRA Corrective Action (CA) Program.

Proposed Remediation

With respect to the human exposures Environmental Indicator, the remediation referenced in the report prepared by the Connecticut Department of Environmental Protection (CTDEP)^[1] was completed. Documentation pertaining to the soil conditions prior to remediation and subsequent to soil remediation can be found in reports^{[2][3][4]} in the CTDEP files. All soils were remediated to residential use standards and as a result, the potential for exposure to contaminated soils has been eliminated.^[5] Information on the approved long-term groundwater monitoring program^{[6][7]} currently in progress can also be found in various reports in the CTDEP files.

We disagree with the statement by the CTDEP^[1] that "...shoppers may potentially be subject to inhalation of gases...residual VOCs in sub-slab soils...VOC contaminated groundwater". Since the soil remediation work was completed, no residual VOCs remain. In addition, as for groundwater, samples collected both prior to and subsequent to soil remediation did not indicate groundwater contamination exceeding Residential Volatilization Criteria.^[5]

RCRA CA Program

Specifically, the CA Program requires demonstration that the Conveyed Parcel, or any other site subject to this program, demonstrate it is Stabilized using two Environmental Indicators. The two Environmental Indicators are: (1) Current Human Exposures Under Control (CA 725), and (2) Migration of Contaminated Groundwater Under Control (CA 750).^[8]

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Based upon our discussion with the USEPA, we understand the CTDEP prepared an Environmental Indicator Assessment at the request of the USEPA. The results of the CTDEP's 1997 assessment determined that compliance of each Environmental Indicator has been demonstrated and further recommended the "YE" status code be applied to each indicator. The "YE" status code means the site is Stabilized.^[8]

We concur with the CTDEP's conclusions and recommendations that were made back in 1997. Moreover, the long-term groundwater monitoring along with the subsequent soil removals all act as evidence of this. Since the origin of the USEPA's initial concerns pertained to the 1997 assessment, we suggest that any additional information needed by the USEPA be provided by the CTDEP.

If you have any questions, please do not hesitate to call.

Very truly yours,

Langan Engineering and Environmental Services, Inc.

Richard Steiner

Richard Steiner, P.E.

Project Engineer

George P. Kelley

George P. Kelley, P.E.

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C. Harriman, Haley & Aldrich

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- [1] *Environmental Indicators Assessment and Final Remedy Nomination Century Brass Products, Inc., (Conveyed Parcel)*, Waterbury, CT; page 4; prepared by Connecticut Department of Environmental Protection, dated 1 May 1997.
- [2] *Environmental Site Assessment Data Transmittal*, Waterbury Towne Center, Waterbury, CT; Volume 1 of 9; prepared by Halen & Aldrich, Inc., dated September 1993.
- [3] *Report on Phase III Environmental Investigations*, Brass Mill Center, Waterbury, CT; Volume 1 of 5 prepared by Haley & Aldrich, Inc., dated February 1994.
- [4] *Revised Field Report No. 19, Excavation and Handling of Contaminated Soils and Materials*, Former Scovill Brass Industrial Facility, Waterbury, CT; prepared by Fusco-Langan, LLC dated 16 May 1996.
- [5] Remediation Standard Regulations; State of Connecticut Department of Environmental Protection.
- [6] *Revised Long-Term Monitoring Program*, Brass Mill Center, Waterbury, CT; prepared by Haley & Aldrich, Inc.; dated 10 June 1997.
- [7] *Groundwater Monitoring Program*; multiple volumes prepared by Analytical Consulting Technologies, Inc.
- [8] Interim-Final Guidance for RCRA Corrective Action Environmental Indicators; United States Environmental Protection Agency, dated 5 February 1999.