



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION I  
JOHN F. KENNEDY FEDERAL BUILDING  
BOSTON, MASSACHUSETTS 02203-0001



RDMS DocID 106519

December 7, 1996

Mr. Daniel Heintz  
Vice President, Environmental Affairs  
Southdown, Inc.  
1200 Smith St.  
Suite 2400  
Houston, Texas 77002

Southdown, Inc.  
CTD 980515290  
R-13  
# 106519

Re: Final Decision and Response to Comments re: remediation activities conducted pursuant to Hazardous and Solid Waste Amendments Permit; Notification for Removal and Abandonment of Existing Groundwater Monitoring Wells  
Southdown, Inc. Facility  
Former Connecticut Treatment Corporation  
0 Cross St., Bristol, CT  
EPA ID No. CTD980515290

Dear Mr. Heintz:

This letter hereby notifies Southdown, Inc. (Southdown) of the United States Environmental Protection Agency's (EPA) final decision regarding Corrective Action obligations at Southdown's 0 Cross St., Bristol, Connecticut facility ("the facility").

EPA has determined that a "No Action" final remedy was appropriate at the facility. This decision therefore fulfills the facility's Corrective Action requirements. The basis on which this determination has been made is set out in the attached Final Decision and Response to Comments document.

As a result of this decision, EPA has determined that the permittee has satisfied the conditions of its Hazardous and Solid Waste Amendments (HSWA) permit, issued on or about May 6, 1986.

In accordance with this determination, the facility may now initiate activities for the removal and abandonment of the existing groundwater monitoring wells. Removal and abandonment of the wells shall be conducted in accordance with generally accepted standard operating procedures for the decommissioning of wells, such as those set out in ASTM's Standard Guide for Decommissioning of Ground Water Wells, Vadose Zone Monitoring Devices, Boreholes, and Other Devices for Environmental Activities, designation number D5299-92, published January, 1993. A copy of these procedures was forwarded to you at an earlier date.



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Upon completion of well decommissioning activities, please forward a copy of all documentation on the removal and abandonment procedures to both Raphael Cody at EPA and Ms. Sandra Brunelli of CTDEP's Waste Engineering and Enforcement Division.

EPA congratulates Southdown on its closure of the facility. EPA is pleased that the property may once again be put to constructive beneficial reuse. If you have any questions regarding this letter, please contact Raphael Cody at 617/573-5769.

Sincerely,



Linda M. Murphy, Director  
Office of Site Remediation and Restoration

cc:

The Honorable Frank N. Nicastro, Sr., Mayor, Bristol, CT

Ms. Sandra Brunelli, CTDEP, Waste Engineering and Enforcement  
Division

Mr. Gary Gosbee, EPA, Office of Ecosystem Protection

Mr. Joshua Secunda, EPA, Office of Environmental Stewardship

## FINAL DECISION AND RESPONSE TO COMMENTS

SOUTHDOWN, INC.

0 Cross Street, Bristol, Connecticut

### Background

The Southdown, Inc. (facility) referred to in this document was formerly known the Connecticut Treatment Corporation (CTC). The facility was used for the storage of a variety of liquid hazardous wastes including waste oils, aqueous wastes bearing acids, heavy metals, cyanide and phenols. Eight underground concrete tanks were constructed in 1979 to accommodate these wastes; the tanks were lined with a chemical resistant epoxy sealant or fiberglass. The facility used the tanks for temporary storage before transport to CTC's Broderick Road facility, where the wastes were treated. In 1984, CECOS Treatment Corporation, now Southdown, Inc. of Houston, Texas (Southdown), purchased the Facility from CTC and continued to store aqueous wastes at the site. Active storage operations ceased in 1987.

The facility was issued a Resource Conservation and Recovery Act (RCRA) Part B operating permit by the State of Connecticut Department of Environmental Protection (CT DEP) on January 18, 1986. In May of 1986, EPA issued the facility a permit under the Hazardous and Solid Waste Amendments Act of 1984 (HSWA Permit). The HSWA Permit required the facility to conduct a Remedial Investigation. This Remedial Investigation is essentially equivalent to a RCRA Facility Investigation (RFI) under RCRA Corrective Action Program.

The results of the RFI demonstrated that minor releases of low concentrations of certain phthalates and cyanide to surficial soils may have occurred. The RFI concluded, however, and EPA concurred, that these releases did not pose an unacceptable risk to public health or the environment. In addition, the RFI concluded that interim measures or a Corrective Measures study were not necessary.

In a December 10, 1992 letter, EPA conditionally approved the RFI and requested that the Facility initiate closure activities under the auspices of the CT DEP. Closure activities included the decontamination and demolition of the eight concrete storage tanks.

Closure of the RCRA permitted units was completed in 1996

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SOUTHDOWN, INC.**

and is documented in correspondence between CT DEP and Southdown. Two key letters include (1) a March 28, 1996 letter from David A. Nash, Director of the Waste Engineering and Enforcement Division of the CT DEP Bureau of Waste Management to Mr. Daniel Heintz of Southdown and (2) a July 26, 1996 letter from David A. Nash to Mr. Bud Molkenbuhr of Wells Fargo Bank. These letters release Southdown from financial (liability insurance and financial assurance) and trust fund requirements, respectively.

Public Participation

On August 14, 1996, EPA issued a public notice in the Bristol Press which opened a 60 day public comment period on EPA's proposal of a "No Action" final remedy for the facility and EPA's intention to terminate the facility's HSWA Permit. Concurrently with the public notice, EPA mailed out a Statement of Basis to the facility mailing list. The Statement of Basis describes the activities completed to date and the rationale for proposing the No Action alternative. The Statement of Basis was also made available with the administrative record on the facility at the Bristol Town Hall, Bristol, Connecticut.

The Statement of Basis set forth EPA's rationale that the closure activities performed by the facility, under the guidance of the CT DEP, satisfied the requirements of a final remedy per Section 264.525 of Proposed Subpart S (Federal Register, July 27, 1990).

The 60 day public comment period officially ended October 14, 1996. EPA received no written comments from the public during this comment period.

Selected Remedy

EPA is selecting the No Action remedy described in the Statement of Basis as the final remedy for the Southdown facility. EPA considered four threshold criteria and five balancing criteria when making this decision. The four threshold criteria are that all RCRA Corrective Action remedies must (1) be protective of human health and the environment; (2) attain media cleanup standards; (3) control

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the source(s) of releases so as to reduce or eliminate, to the extent practicable, further releases of hazardous waste (including hazardous constituents) that might pose threats to human health and the environment; and (4) comply with applicable standards for waste management.

The five balancing criteria include (1) long-term reliability and effectiveness; (2) reduction of toxicity, mobility or volume of wastes; (3) short-term effectiveness; (4) implementability; and (5) cost.

The HSWA Permit will be terminated as a result of this final remedy decision.

Declaration

EPA has determined that this remedy being undertaken in accordance with the RCRA Corrective Action program is appropriate and will be protective of human health and the environment.

*Linda M. Murphy*

Linda M. Murphy, Director

Office of Site Remediation and Restoration

12/7/96  
Date