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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
JOHN F. KENNEDY FEDERAL BUILDING
BOSTON, MASSACHUSETTS 02203-0001

RCRA RECORDS CENTER
FACILITY SPORTING GOODS
I.D. NO. CTD001453216
FILE LOC. ADMIN REC
OTHER 617
RDMS Doc ID # 1075

June 1, 1999

Victor Ordija
Vice President, Environmental Affairs
Sporting Goods Properties, Inc.
1207 Prospect Drive
Stratford, CT 06615

Dear Mr. Ordija:

As you are probably aware, your facility, located at 615 Asylum Street in Bridgeport, CT, is listed as a high priority for cleanup on the Resource Conservation and Recovery Act (RCRA) Corrective Action Baseline list of facilities. The United States Environmental Protection Agency (EPA), with input from many States, has developed this Baseline list in response to the Government Performance Results Act (GPRA) which requires federal agencies to develop measures for tracking environmental results. This Baseline list will be used to track progress of EPA, the states, and the listed facilities in accelerating corrective action at the 1700+ sites nation-wide which are included in the Baseline list.

The purpose of this letter is to make you aware that a trade press briefing will take place in mid June 1999, to announce a non-regulatory set of reforms to the RCRA Corrective Action program, referred to as the RCRA Cleanup Reforms. The announcement will be made in Washington, D.C., by the Acting Assistant Administrator of EPA's Office of Solid Waste & Emergency Response, Mr. Timothy Fields, Jr. The list of facilities on the Baseline may be released during the press announcement. I am giving you this advanced notice of the trade press announcement so that you have the opportunity to prepare for any questions that may arise because your facility is included as one of the facilities in the Baseline.

The RCRA Cleanup Reforms will focus on increasing the pace of cleanup at the 1700+ high priority facilities. The Reforms are EPA's comprehensive effort to address the key impediments to cleanups, maximize program flexibility, and spur progress with a set of ambitious national cleanup goals. The national cleanup goals apply to 1700+ RCRA sites identified by EPA and the States as high priority for cleanup over the next several years. The goals, set by EPA under the GPRA, are that by 2005, the States and EPA verify and document that 95 percent of the 1700+ high priority RCRA facilities have "current human exposures under control," and 70 percent of these facilities have "migration of contaminated groundwater under control." To ensure that these ambitious goals are achieved, the RCRA Cleanup Reforms establish aggressive national cleanup targets for each of the next several years.

To ensure that achievement of the two environmental indicators, "current human exposures under control" and "migration of contaminated groundwater under control," is evaluated and documented in a consistent way for all high priority facilities, EPA has developed a checklist, entitled Documentation of Environmental Indicator Determination. This checklist is to be used by EPA, States and facilities for evaluating whether facilities have achieved the two environmental indicators. Enclosed is a copy of the checklist which I have recently completed for your facility. Based on data available to EPA as of the date of this letter, more information is necessary in order to make a determination as to whether the environmental indicators have been achieved. Through the exercise of completing the checklist, I have identified specific information needs which must be addressed before your facility can be considered to have "current human exposures under control" and "migration of contaminated groundwater under control." These information needs are described below.

1. Data should be collected to determine current concentrations of VOCs in groundwater in the vicinity of the guard shack (Phase I RFI data and CAMU monitoring data showed elevated concentrations in wells MW 7S & R). If levels of VOCs in groundwater are still elevated, the potential for migration of vapors into overlying structures (e.g., the guard shack and trailers) should be evaluated as well as the potential for off-site migration of contaminated groundwater.
2. An evaluation of groundwater use in the vicinity of your facility, in areas where groundwater could potentially be impacted by contaminants from your facility, should be conducted to determine whether any private wells are still in use.
3. On-site stream sediments should be sampled to evaluate contaminant levels. If elevated levels of site-related contaminants are detected in sediments in sections of on-site streams, near locations where those streams exit the facility, sediment sampling should be extended to downstream off-site sections.
4. In areas where elevated levels of contaminants have been detected in groundwater, further evaluation needs to be conducted to determine the extent of groundwater contamination. Once the extent of groundwater contamination has been determined in these areas, hydrogeologic information should be used to evaluate the potential for migration of contaminated groundwater and/or groundwater monitoring should be conducted over time to determine whether migration of contaminated groundwater has stabilized.
5. If the additional data on the extent of groundwater contamination and information on hydrogeologic conditions suggests that contaminated groundwater may be discharging into surface water bodies, further evaluation should be conducted to assess any impacts of contaminated groundwater on those surface water bodies.

In your most recent quarterly schedule, submitted in April 1999, you provided a schedule for

conducting on-site sampling of stream and wetland sediments, off-site stream sediment sampling, and an off-site well survey. In your next quarterly schedule, please also include a schedule for conducting the work necessary to address the information needs discussed in paragraphs 1, 4, and 5 above.

Based on an evaluation of the additional work necessary to meet the two environmental indicators at your facility, EPA has set a goal of having "current human exposures under control" at your facility by the end of December 2001 and having "migration of contaminated groundwater under control" at your facility by the end of December 2002. Please keep me informed of any problems you foresee in meeting the environmental indicators in this time-frame. Also, please keep me informed of any new information which could result in a determination that your facility has "current human exposures under control" or "migration of contaminated groundwater under control." In addition, please feel free to contact me if you have any questions on the upcoming trade press briefing on RCRA Cleanup Reforms, the enclosed checklist for evaluating achievement of environmental indicators, or RCRA Corrective Action in general. I can be reached at 617/918-1363.

Sincerely,



Stephanie Carr
RCRA Facility Manager

Enclosure

cc: S. Northey, W-C Diamond (w/enclosure)
L. Jorgensen, W-C Diamond (w/enclosure)
G. Shteynberg, CT DEP (w/enclosure)
K. Sullivan, CT DEP (w/enclosure)