



**DOCUMENTATION OF ENVIRONMENTAL INDICATOR DETERMINATION**

Interim Final 2/5/99

**RCRA Corrective Action  
Environmental Indicator (EI) RCRIS code (CA750)**

**Migration of Contaminated Groundwater Under Control**

**Facility Name:** Bantam River Corporate Park  
**Facility Address:** 607 Bantam Road, Litchfield, Connecticut  
**Facility EPA ID #:** CTD 000791772

- 1. Has all available relevant/significant information on known and reasonably suspected releases to the groundwater media, subject to RCRA Corrective Action (e.g., from Solid Waste Management Units (SWMU), Regulated Units (RU), and Areas of Concern (AOC)), been considered in this EI determination?
  - X** If yes - check here and continue with #2 below.
  - If no - re-evaluate existing data, or
  - if data are not available, skip to #8 and enter "IN" (more information needed) status code.

**BACKGROUND**

**Definition of Environmental Indicators (for the RCRA Corrective Action)**

Environmental Indicators (EI) are measures being used by the RCRA Corrective Action program to go beyond programmatic activity measures (e.g., reports received and approved, etc.) to track changes in the quality of the environment. The two EI developed to-date indicate the quality of the environment in relation to current human exposures to contamination and the migration of contaminated groundwater. An EI for non-human (ecological) receptors is intended to be developed in the future.

**Definition of "Migration of Contaminated Groundwater Under Control" EI**

A positive "Migration of Contaminated Groundwater Under Control" EI determination ("YE" status code) indicates that the migration of "contaminated" groundwater has stabilized, and that monitoring will be conducted to confirm that contaminated groundwater remains within the original "area of contaminated groundwater" (for all groundwater "contamination" subject to RCRA corrective action at or from the identified facility (i.e., site-wide)).

**Relationship of EI to Final Remedies**

While Final remedies remain the long-term objective of the RCRA Corrective Action program the EI are near-term objectives which are currently being used as Program measures for the Government Performance and Results Act of 1993, GPRA). The "Migration of Contaminated Groundwater Under Control" EI pertains ONLY to the physical migration (i.e., further spread) of contaminated ground water and contaminants within groundwater (e.g., nonaqueous phase liquids or NAPLs). Achieving this EI does not substitute for achieving other stabilization or final remedy requirements and expectations associated with sources of contamination and the need to restore, wherever practicable, contaminated groundwater to be suitable for its designated current and future uses.

**Duration / Applicability of EI Determinations**

EI Determinations status codes should remain in RCRIS national database ONLY as long as they remain true (i.e., RCRIS status codes must be changed when the regulatory authorities become aware of contrary information).

BANTAM RIVER  
CTD 000791772  
R-13  
#107911

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2. Is groundwater known or reasonably suspected to be "contaminated"<sup>1</sup> above appropriately protective "levels" (i.e., applicable promulgated standards, as well as other appropriate standards, guidelines, guidance, or criteria) from releases subject to RCRA Corrective Action, anywhere at, or from, the facility?

If yes - continue after identifying key contaminants, citing appropriate "levels," and referencing supporting documentation.

If no - skip to #8 and enter "YE" status code, after citing appropriate "levels," and referencing supporting documentation to demonstrate that groundwater is not "contaminated."

If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): Reference – "RCRA Closure Plan and Verification Report, Parts 1, 2 and 3, Chemical Storage Area, Bantam River Corporate Park, 607 Bantam Road, Litchfield, CT 06759" (RCRA Report) prepared for Bantam River Corporate Park, LLC by CRB Geological & Environmental Services, Inc. dated November 2005.

Revised Summary Status Report, Bantam River Corporate Park, 607 Bantam Road, Litchfield, CT 06759, prepared for Bantam River Corporate Park, P.O. Box 1416, Washington, Connecticut 06793, by CRB Geological & Environmental Services, Inc., 747 Main Street, Suite 121, Concord, Massachusetts 01742, May 2004

Bi-Annual Groundwater Monitoring Report, Bantam River Corporate Park, 607 Bantam Road, Litchfield, Connecticut, prepared for Bantam River Corporate Park, LLC, P.O. Box 1416, Washington, CT 06793, May 27, 2009.

Rationale: The site is in a GA groundwater classification area and is subject to the requirements of Connecticut's Remediation Standard Regulations (RSRs), including the Ground Water Protection Criteria (GWPC), Surface Water Protection Criteria (SWPC) and Residential Volatilization Criteria (RVC). All monitor wells on the site produce groundwater samples that do not contain tested constituents of concern at concentrations exceeding any of these criteria except monitor well MW-9D, which is located at the downgradient corner of the site; potentially downgradient from a former solvent storage tank. The most recent sample from this well (collected May 11, 2009) contained 12 micrograms per liter (ug/l) of 1,1 dichloroethylene (DCE) compared to the most stringent criterion (GWPC) of 7 ug/l.

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<sup>1</sup> "Contamination" and "contaminated" describes media containing contaminants (in any form, NAPL and/or dissolved, vapors, or solids, that are subject to RCRA) in concentrations in excess of appropriate "levels" (appropriate for the protection of the groundwater resource and its beneficial uses).

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3. Has the migration of contaminated groundwater stabilized (such that contaminated groundwater is expected to remain within "existing area of contaminated groundwater"<sup>2</sup> as defined by the monitoring locations designated at the time of this determination)?

- If yes - continue, after presenting or referencing the physical evidence (e.g., groundwater sampling/measurement/migration barrier data) and rationale why contaminated groundwater is expected to remain within the (horizontal or vertical) dimensions of the "existing area of groundwater contamination"<sup>2</sup>.
- If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"<sup>2</sup>) - skip to #8 and enter "NO" status code, after providing an explanation.
- If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): "RCRA Closure Plan and Verification Report, Parts 1, 2 and 3, Chemical Storage Area, Bantam River Corporate Park, 607 Bantam Road, Litchfield, CT 06759" prepared for Bantam River Corporate Park, LLC by CRB Geological & Environmental Services, Inc. dated November 2005. Groundwater quality at the site has been monitored since late 1993 to the present (May 2009) and the concentrations of VOCs in monitor well MW-9D declined steadily until approximately 2002, and since then to the present (May 2009) the concentrations of VOCs have varied within a few micrograms per liter. The sources of VOCs on the site have been remediated, so the groundwater quality will remain stable or improve with time.

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<sup>2</sup> "existing area of contaminated groundwater" is an area (with horizontal and vertical dimensions) that has been verifiably demonstrated to contain all relevant groundwater contamination for this determination, and is defined by designated (monitoring) locations proximate to the outer perimeter of "contamination" that can and will be sampled/tested in the future to physically verify that all "contaminated" groundwater remains within this area, and that the further migration of "contaminated" groundwater is not occurring. Reasonable allowances in the proximity of the monitoring locations are permissible to incorporate formal remedy decisions (i.e., including public participation) allowing a limited area for natural attenuation.

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4. Does "contaminated" groundwater discharge into surface water bodies?
- If yes - continue after identifying potentially affected surface water bodies.
- If no - skip to #7 (and enter a "YE" status code in #8, if #7 = yes) after providing an explanation and/or referencing documentation supporting that groundwater "contamination" does not enter surface water bodies.
- If unknown - skip to #8 and enter "IN" status code.

Rationale and Reference(s): Reference: RCRA Closure Plan and Verification Report, Parts 1, 2 and 3, Chemical Storage Area, Bantam River Corporate Park, 607 Bantam Road, Litchfield, CT 06759" (RCRA Report) prepared for Bantam River Corporate Park, LLC by CRB Geological & Environmental Services, Inc. dated November 2005.

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Bi-Annual Groundwater Monitoring Report, Bantam River Corporate Park, 607 Bantam Road, Litchfield, Connecticut, prepared for Bantam River Corporate Park, LLC, P.O. Box 1416, Washington, CT 06793, May 27, 2009.

Rationale: The contaminated groundwater discharges to the Bantam River located approximately 50 feet south of monitor well MW-9D. The SWPC for 1,1 DCE is 96 ug/l, which is considerably higher than the concentrations in the site well samples. Other detected constituents are also at concentrations that are below the SWPC.

The Bantam River is the largest surface water course in the area and is locally the discharge location for the groundwater. Figures 1, 2 and 3 in the report entitled "RCRA Closure Plan and Verification Report, Parts 1, 2 and 3, Chemical Storage Area, Bantam River Corporate Park, 607 Bantam Road, Litchfield, CT 06759" (RCRA Report) prepared for Bantam River Corporate Park, LLC by CRB Geological & Environmental Services, Inc. dated November 2005, show the topography, the proximity of the Site to the river and a cross section which shows the groundwater discharging to the river. The report concludes "Surface water and groundwater flow at the site is generally towards the Bantam River located in the southern region of the site." The hydrogeologic cross section attached to this report shows the water levels in a deep/shallow well pair located adjacent to the Bantam River. The upward hydraulic head in the vicinity of the well pair shows that the Bantam River is the discharge point for the Site groundwater.

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5. Is the discharge of "contaminated" groundwater into surface water likely to be "insignificant" (i.e., the maximum concentration<sup>3</sup> of each contaminant discharging into surface water is less than 10 times their appropriate groundwater "level," and there are no other conditions (e.g., the nature, and number, of discharging contaminants, or environmental setting), which significantly increase the potential for unacceptable impacts to surface water, sediments, or eco-systems at these concentrations)?

  X   If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of key contaminants discharged above their groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) provide a statement of professional judgement/explanation (or reference documentation) supporting that the discharge of groundwater contaminants into the surface water is not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

       If no - (the discharge of "contaminated" groundwater into surface water is potentially significant) - continue<sup>3</sup> after documenting: 1) the maximum known or reasonably suspected concentration<sup>3</sup> of each contaminant discharged above its groundwater "level," the value of the appropriate "level(s)," and if there is evidence that the concentrations are increasing; and 2) for any contaminants discharging into surface water in concentrations<sup>3</sup> greater than 100 times their appropriate groundwater "levels," the estimated total amount (mass in kg/yr) of each of these contaminants that are being discharged (loaded) into the surface water body (at the time of the determination), and identify if there is evidence that the amount of discharging contaminants is increasing.

       If unknown - enter "IN" status code in #8.

Rationale and Reference(s): Reference: RCRA Closure Plan and Verification Report, Parts 1, 2 and 3, Chemical Storage Area, Bantam River Corporate Park, 607 Bantam Road, Litchfield, CT 06759" (RCRA Report) prepared for Bantam River Corporate Park, LLC by CRB Geological & Environmental Services, Inc. dated November 2005.

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Rationale: The contaminated groundwater discharges to the Bantam River located approximately 50 feet south of monitor well MW-9D. The SWPC for 1,1 DCE is 96 ug/l, which is considerably higher than the concentrations in the site well samples. Other detected constituents are also at concentrations that are below the SWPC.

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<sup>3</sup> As measured in groundwater prior to entry to the groundwater-surface water/sediment interaction (e.g., hyporheic) zone.

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6. Can the discharge of "contaminated" groundwater into surface water be shown to be "currently acceptable" (i.e., not cause impacts to surface water, sediments or eco-systems that should not be allowed to continue until a final remedy decision can be made and implemented<sup>4</sup>)?

\_\_\_\_\_ If yes - continue after either: 1) identifying the Final Remedy decision incorporating these conditions, or other site-specific criteria (developed for the protection of the site's surface water, sediments, and eco-systems), and referencing supporting documentation demonstrating that these criteria are not exceeded by the discharging groundwater; OR

2) providing or referencing an interim-assessment<sup>5</sup>, appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialist, including ecologist) adequately protective of receiving surface water, sediments, and eco-systems, until such time when a full assessment and final remedy decision can be made. Factors which should be considered in the interim assessment (where appropriate to help identify the impact associated with discharging groundwater) include: surface water body size, flow, use/classification/habitats and contaminant loading limits, other sources of surface water/sediment contamination, surface water and sediment sample results and comparisons to available and appropriate surface water and sediment "levels," as well as any other factors, such as effects on ecological receptors (e.g., via bio-assays/benthic surveys or site-specific ecological Risk Assessments), that the overseeing regulatory agency would deem appropriate for making the EI determination.

\_\_\_\_\_ If no - (the discharge of "contaminated" groundwater can not be shown to be "currently acceptable") - skip to #8 and enter "NO" status code, after documenting the currently unacceptable impacts to the surface water body, sediments, and/or eco-systems.

\_\_\_\_\_ If unknown - skip to 8 and enter "IN" status code.

Rationale and Reference(s): \_\_\_\_\_

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<sup>4</sup> Note, because areas of inflowing groundwater can be critical habitats (e.g., nurseries or thermal refugia) for many species, appropriate specialist (e.g., ecologist) should be included in management decisions that could eliminate these areas by significantly altering or reversing groundwater flow pathways near surface water bodies.

<sup>5</sup> The understanding of the impacts of contaminated groundwater discharges into surface water bodies is a rapidly developing field and reviewers are encouraged to look to the latest guidance for the appropriate methods and scale of demonstration to be reasonably certain that discharges are not causing currently unacceptable impacts to the surface waters, sediments or eco-systems.

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7. Will groundwater monitoring / measurement data (and surface water/sediment/ecological data, as necessary) be collected in the future to verify that contaminated groundwater has remained within the horizontal (or vertical, as necessary) dimensions of the "existing area of contaminated groundwater?"

If yes - continue after providing or citing documentation for planned activities or future sampling/measurement events. Specifically identify the well/measurement locations which will be tested in the future to verify the expectation (identified in #3) that groundwater contamination will not be migrating horizontally (or vertically, as necessary) beyond the "existing area of groundwater contamination."

If no - enter "NO" status code in #8.

If unknown - enter "IN" status code in #8.

Rationale and Reference(s): Work Plan and Quality Assurance Project Plan, Bantam River Corporate Park, Litchfield, Connecticut, Prepared for Bantam River Corporate Park, LLC, Prepared by GZA GeoEnvironmental, Inc., 26 Sherman Court, Fairfield, Connecticut 06824, February 2009. Three site monitor wells will be monitored for VOCs and one site monitor well will be monitored for ETPH on a twice per year basis until compliance is achieved, in accordance with a CT DEP-approved plan.

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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting documentation as well as a map of the facility).

YES, "Migration of Contaminated Groundwater Under Control" has been verified. Based on a review of the information contained in this EI determination, it has been determined that the "Migration of Contaminated Groundwater" is "Under Control" at the Bantam River Corporate Park, 607 Bantam Road, Litchfield, CT. Specifically, this determination indicates that the migration of "contaminated" groundwater is under control, and that monitoring will be conducted to confirm that contaminated groundwater remains within the "existing area of contaminated groundwater" This determination will be reevaluated when the Agency becomes aware of significant changes at the facility.

NO - Unacceptable migration of contaminated groundwater is observed or expected.

IN - More information is needed to make a determination.

Completed by (signature) *Robert Lamonica* Date 8/18/09  
(print) Robert Lamonica  
(title) Principal Consultant

DEP Reviewed by: (signature) *Sandy Brunelli* Date 8/26/09  
(print) Sandy Brunelli  
(title) EA 3

DEP Supervisor (signature) *David Ringquist* Date 8-19-09  
(print) David Ringquist  
(title) Supervising Engineer

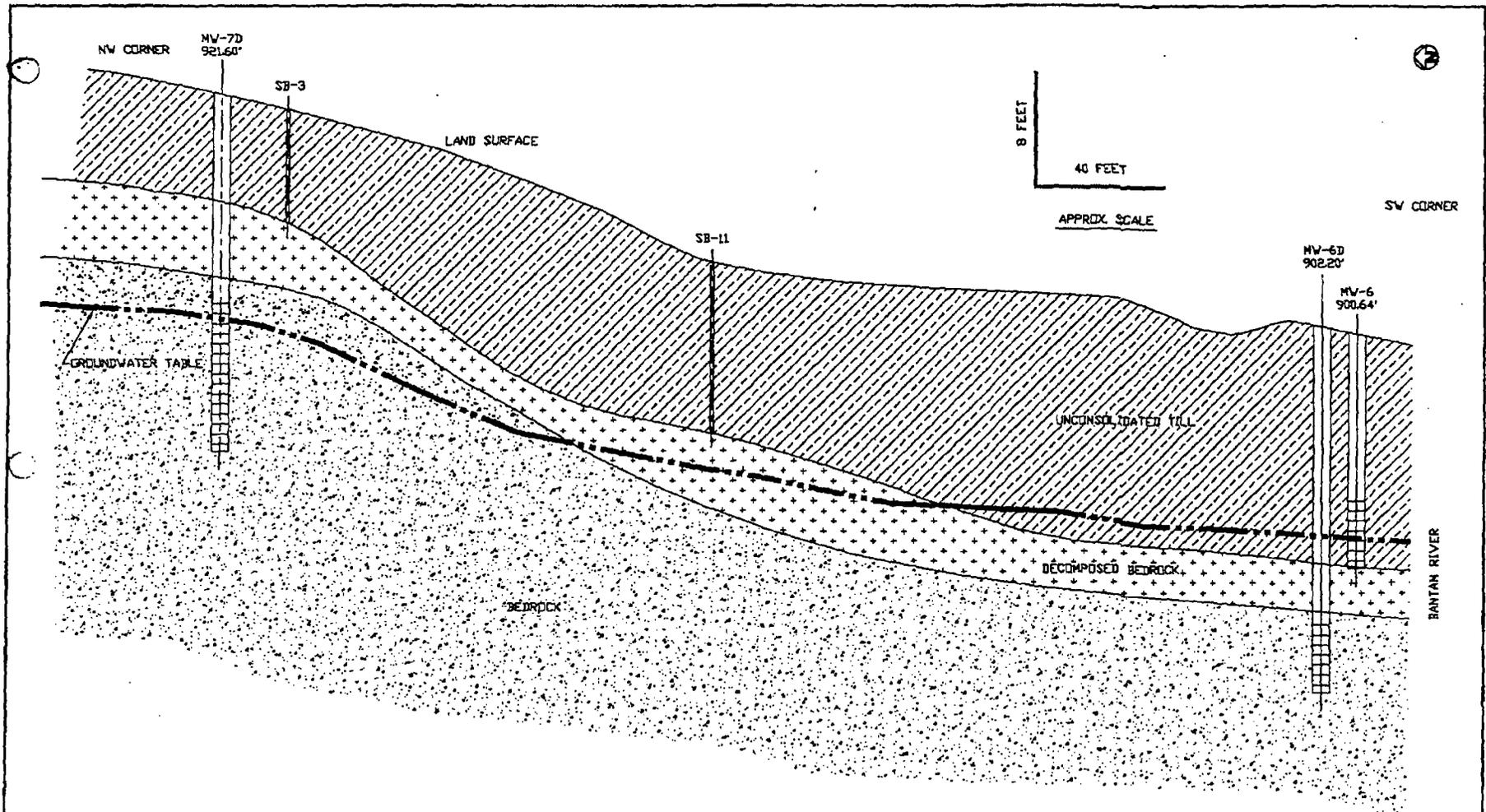
Locations where References may be found:

Connecticut Department of Environmental Protection file room at 79 Elm Street  
Hartford, CT 06106

File Room contact telephone number and e-mail

(name) Terry Parker  
(phone #) 860 424-3936  
(e-mail) Terry.parker@ct.gov

*Revised 10/29/09*  
*James S. K.*  
*Chief, RCRA Corrective Action*



921.60' NORTH RIM CASING ELEVATION (FT) REFERENCED TO N.G.V.D. OF 1929

CADBEA\414\08\VIEW\DATA\FIG-53.MXD

<p>FIGURE 3</p>	<p>VERTICAL CROSS-SECTION B/E AEROSPACE 608 BANTAM ROAD LITCHFIELD, CONNECTICUT</p>	
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APRIL 22, 2002