

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: _____ **ITW Waterbury Buckle, Inc.** _____
Facility Address: _____ **952 S. Main St., Waterbury, CT** _____
Facility EPA ID #: _____ **CTD001165703** _____

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?

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., non-aqueous 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).

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2. Is **groundwater** known or reasonably suspected to be "**contaminated**" 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):

Groundwater.

Background. During Stabilization investigation activities conducted in the fall of 1997, vinyl chloride and cis-1,2-dichloroethylene (cis-DCE) were detected in MW-2 at 190 and 49 ppb, respectively. MW-2 is located just west of AOC 15, Container Storage Area #1 between AOC 15 and the Mad River. See Site Investigation Report, ITW Waterbury Buckle Facility, Waterbury, Connecticut, dated November 1997. The presence of vinyl chloride and cis-DCE suggests reductive dehalogenation of some chlorinated precursor such as 111-TCA, TCE or PCE which would most likely be attributable to AOC 15. The detected concentrations are below CTDEP's Surface-Water Protection Criteria (SWC) of 15,750 ppb for vinyl chloride (no SWC is provided for cis-DCE), so the presence of vinyl chloride does not pose a current human health threat based on these standards.

However, at the time this evaluation was first conducted in April of 1999, MW-2 was the only well installed to define the extent of this contamination; because no other wells had been installed, it was determined that this plume could not meet the criteria for CA750, *Migration of Contaminated Groundwater Under Control*. In addition, since the plume could not be considered under control, it was still possible that a human health threat existed from surface water as the facility did not sample surface water during the fall of 1997 work activities (only sediments). Therefore, pending results of groundwater samples from another well located further downgradient and/or surface water sampling activities as set forth in a December 14, 1998 letter to the facility, it was recommended that the facility did not meet the criteria for CA725, *Current Human Exposures Under Control*.

1998

Recent Activities. In a letter dated December 14, 1999, EPA requested the facility (1) install an additional groundwater monitoring well downgradient of MW-2 and (2) sample surface water in the Mad River for the presence of vinyl chloride. The results of these activities were presented in a letter from the facility dated July 19, 1999. Briefly, analytical results of surface water sampling did not reveal the presence of vinyl chloride. Similarly, analytical results of the sampling of the groundwater from the new monitoring well, MW-5, did not reveal the presence of either cis-DCE or vinyl chloride. Re-sampling of MW-2 again revealed the presence of vinyl chloride and cis-DCE in concentrations of 46 and 2 ug/l, respectively.

Subsurface Soils as a potential source of contaminants to GW.

The facility has recommended to consolidate many AOCs located on the basement floor of the facility building into a single area, entitled the Basement Waste Management Area (BWMA). It is possible, perhaps

likely, that contamination exists under the building, but for purposes of Stabilization, this contamination is capped and as such, will not leach to GW. The work conducted in the fall of 1997 was designed to determine the possible existence of plumes which may have originated from under the building, but with the exception of the contamination detected at MW-2, the data does not suggest that migration of contaminants from under the facility building is a problem. If at some time in the future the facility is requested to achieve a final remedy, then the BWMA, as a potential source of contaminants to groundwater, will need to be addressed.

Footnotes:

"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"**² 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"²).

If no (contaminated groundwater is observed or expected to migrate beyond the designated locations defining the "existing area of groundwater contamination"²) - 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):

The recent groundwater monitoring investigation activities as presented above answer the remaining concerns associated with the migration of dissolved-phase contamination and reasonably suggest that the migration of contaminated groundwater is under control at this time; the data indicates dissolved-phase contamination is confined to within an area of groundwater in the immediate vicinity of AOC 15.

In addition, the facility has taken steps to control/mitigate sources of potential groundwater contamination exposures including decommissioning activities (accounting for some seventeen (17) interim measures (IM)).

² "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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5. Is the **discharge** of "contaminated" groundwater into surface water likely to be "**insignificant**" (i.e., the maximum concentration³ 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)?

_____ If yes - skip to #7 (and enter "YE" status code in #8 if #7 = yes), after documenting: 1) the maximum known or reasonably suspected concentration³ 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 after documenting: 1) the maximum known or reasonably suspected concentration³ 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 concentrations³ 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): _____

_____ **not applicable** _____

³ 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 implemented⁴)?

_____ 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,⁵ appropriate to the potential for impact, that shows the discharge of groundwater contaminants into the surface water is (in the opinion of a trained specialists, 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): _____

_____ **not applicable** _____

⁴ 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.

⁵ 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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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).

- YE** - 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 **ITW Waterbury Buckle** facility, EPA ID # **CTD001165703**, located at **952 S. Main St., Waterbury, 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 re-evaluated 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) <u></u>	Date: 4/2/99
	(print) <u>Raphael Cody</u>	Revised: 7/21/99
	(title) <u>RCRA Facility Manager</u>	
Supervisor	(signature) <u></u>	Date <u>8/2/99</u>
	(print) <u>Matt Hoagland</u>	
	(title) <u>Chief, RCRA Corrective Action</u>	
	(EPA Region or State) <u>Region I</u>	

Locations where References may be found:

See facility files

STATE contact telephone and e-mail numbers

(name) _____

(phone #) _____

(e-mail) _____

**GPRA: Tracking Interim Measures at AOCs
 (Stabilization as a function of IM's at AOCs)
 ITW Waterbury Buckle
 952 S. Main St., Waterbury, CT
 Revised Mar. 4/2/99**

AOC #	Description	Background: RFA and RFA Response	Status after August 22, 1996 If not possible to determine status of AOC, is it possible to infer status from existing site data? If so, explain. If not, provide date that info is likely to be available.	Removal, decommissioning, or other activity that could constitute an interim measure (IM)?	CA600/CA650
1	<p>Container Storage Area #2</p> <p>located on ground floor at west end of building; used to store spent plating wastes containing cyanide (F007, F008); floor drain located in the area reportedly had discharged to the Mad River.</p>	<p>Final Draft RCRA Facility Assessment (RFA), dated May 7, 1992, concluded a potential for release to all media. RFA at p. 32. Also, recommended "investigation of the floor drain including sampling of potentially contaminated subsurface soil or sediments at its discharge point. RFA at p. 34.</p> <p>ITW indicated floor drain had been plugged and no recorded releases and recommended inclusion of this AOC into the Basement Waste Management Area (BWMA). <u>ITW Waterbury Buckle Company Pre-Resource Conservation and Recovery Act facility Investigation: Evaluation of Areas of Concern</u>, dated May 1993 (RFA Response) at Appendix A.</p>	<p>EPA agreed to consolidate this basement area AOC into the proposed BWMA. See letter entitled, <u>Voluntary Corrective Action Program Requirements and Expectations</u>, dated August 22, 1996 (VCA letter).</p>	No.	

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2	Discharge Outfall to Mad River	<p>RFA. Facility dates back to approximately 1852. Outfall was used for discharge of untreated and treated wastewater to the Mad River. Discharge likely occurred before issuance of a NPDES permit. At time of RFA, oily sheen was observed on surface water and the discharge point. RFA indicated a release to surface water and sediments and recommended sampling of surface water and sediments.</p> <p>ITW indicated all discharges have ceased, the discharge pipe sealed shut to prevent future releases, discharge was regulated under the NPDES program, etc. - and thereby recommended it be eliminated from further consideration.</p>	<p>EPA did not concur with facility's recommendation and requested sampling of sediments. Facility drafted and implemented a workplan to investigate this area, among others. See <u>ITW Waterbury Buckle Company, Investigation Workplan</u>, dated January 1997 (Revised April 1997) (Workplan). Sampling results did not indicate any significant exceedences of criteria for metals or VOCs.</p>	No.	
3	<p>Filter Press System.</p> <p>used from 1984 to 1991 to dewater waste water treatment sludges. Presses were removed in the Spring of 1991. This AOC located on the first floor of facility building above AOC 14.</p>	<p>PA-Plus: unknown release potential.</p> <p>ITW indicated that this area was decommissioned in 1991 and recommended its elimination from further consideration.</p>	<p>EPA essentially concurred with facility's recommendations since, by virtue of being "located on the first or second floor of the main building . . . there are no environmental media to contain [hazardous constituents.]" [N]o past or future releases of [hazardous constituents] to the environment were or will be possible." VAC letter at p. 5 citing RFA response at p. 8.</p>	<p>Yes. RFA indicates this presses were "removed in the Spring of 1991." RFA at p. 34.</p>	<p>CA600: use RFA (May 7, 1992) at p. 34 CA650: use today's date.</p>

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4	1,1,1-TCA Degreaser and associated satellite accumulation area. Degreaser was located on the first floor	RFA indicated potential for release to groundwater and surface water/sediments. RFA indicated degreaser was removed in Spring of 1991. RFA at p. 34. ITW indicated degreaser was removed in Spring of 1991 and no evidence of release. Recommended for elimination from further consideration.	EPA concurred. See rationale for AOC 3 above.	Yes. RFA indicated degreaser was removed in Spring of 1991. RFA at p. 34.	CA600: use RFA (May 7, 1992) at p. 34 CA650: use today's date.
5	Methylene Chloride degreaser. formerly located in basement adjacent to the die cast manufacturing area.	RFA indicated potential for release and the existence of a floor drain located within 25 feet of the degreaser. RFA suggested "sampling of the floor drain contents and the area around and beneath the floor drain. . ." RFA at p. 35. ITW indicated no reported releases, that unit was removed in 1989 and that this AOC should be included in the BWMA.	EPA concurred with facility to include in BWMA.	Yes. RFA noted that unit was removed in 1989.	CA600: use RFA (May 7, 1992) at p. 34 CA650: use today's date.
6	Electroplating Wastewater Treatment System. consisting of several tanks located in the basement and used for wastewater treatment (cyanide-bearing electroplating wastewater).	RFA indicated a release to surface water/sediments and suggested sampling soils beneath cracks in the basement floors. ITW indicates no recorded releases and that the area was decommissioned, cleaned and sealed, but the concrete tanks are still in place. RFA Response at Appendix A. Recommended for inclusion in the BWMA.	EPA concurred to include in the BWMA.	Yes. Although concrete tanks left in place, area was decommissioned including cleaning and sealing.	CA600: use RFA Response (May 1993) at Appendix A. CA650: use today's date.
7	Polypropylene Strong Acid Wastewater Holding Tank. previously used as part of AOC 6.	RFA. Release potential. At time of RFA, tank was used as a temporary holding tank for nonhazardous waste waster from a Soap Roll and Ball Roll process. ITW. No recorded releases, tank cleaned as part of a decommissioning activities (presumably 1991) and recommended for inclusion in the BWMA.	EPA concurred with recommendation to include in the BWMA.	Yes. RFA Response indicated that tank was "cleaned as part of decommissioning process." RFA Response at Appendix A.	CA600: use RFA Response (May 1993) at Appendix A. CA650: use today's date.

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8	Polypropylene Cyanide Wastewater Holding Tank. previously used as part of AOC 6.	RFA. release potential ITW. no reported releases, cleaned as part of decommissioning activities (presumably 1991), and recommended for inclusion in BWMA.	EPA concurred with recommendation to include in BWMA.	Yes. RFA Response indicated that tank was "cleaned as part of decommissioning process." RFA Response at Appendix A.	CA600: use RFA Response (May 1993) at Appendix A. CA650: use today's date.
9	Polypropylene Spill Tank. previously used as part of AOC 6.	RFA. release potential. No further action recommended. ITW. no reported releases, cleaned as part of decommissioning activities in 1991, and recommended for inclusion in BWMA.	EPA concurred with recommendation to include in BWMA.	Yes. RFA indicated tank was removed in Spring of 1991. RFA Response indicated that tank was "cleaned and removed as part of decommissioning process in 1991." RFA Response at Appendix A.	CA600: use RFA (May 7, 1992) at p. 35 CA650: use today's date.
10 A&B	Rack Stripping Operation. consisted of stripping system for plating rack. Also included a Spent Hydrogen Peroxide Stripping Solution Holding Tank.	RFA indicated a release: "[c]ontaminated rinsewater was allowed to overflow and discharge with drippage to the sanitary sewer via the floor drain." RFA at p. 35. ITW. Equipment tanks were removed during decommissioning process in Spring of 1991. Recommended no further action as unit(s) located on the first floor.	EPA concurred with facility recommendations. See rationale for AOC 3.	Yes. RFA indicated associated equipment was removed in the spring of 1991.	CA600: use RFA (May 7, 1992) at p. 35 CA650: use today's date.
11	Tumbling Wastewater Treatment System. consisting of several tanks previously located in the basement and used for wastewater treatment.	RFA indicated a release to surface water/sediments. RFA at p. 32. Recommended sampling soils beneath any cracked areas in the basement floor. ITW. No recorded releases, tanks cleaned as part of decommissioning process and recommended for inclusion in BWMA.	EPA concurred with recommendation to include in BWMA.	Yes. RFA indicated that "although most of the tanks have been removed, a few do remain." RFA at p. 35. RFA Response indicates that "[a]rea cleaned and tanks removed as part of decommissioning process." RFA Response at Appendix A.	CA600: use RFA (May 7, 1992) at p. 35 CA650: use today's date.

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12	Acid Storage Area. consisting of an outdoor shed used to store acid product.	RFA. Unknown release potential. Recommended sampling of surface soils at location of former shed area. ITW. No recorded releases, no evidence of ground staining, shed removed in 1990 because acids were no longer used by facility. No further action recommended.	Based on a site visit on May 20, 1996, EPA concurred with facility recommendation. VCA letter at p. 8.	Yes. Shed removed in 1990.	CA600: use RFA (May 7, 1992) at p. 36 CA650: use today's date.
13	Former Waste Sludge Pile. metal hydroxide sludge pile; undergoing post closure monitoring.	ITW. Pile closed in 1985 by removal of sludge and layer of soil; certified closed by CTDEP 10/18/85. Currently undergoing post closure monitoring.	AOC 13 does not merit further consideration at this time. See VCA letter at p. 6.	No. Closure activities.	
14	Sludge Roll-Off Container. Located beneath the AOC 3 filter presses which were located on the first floor.	RFA. Unknown release potential. Recommended sampling concrete pad on which container was situated. ITW. No recorded releases, unit removed in Spring of 1991 as part of decommissioning activities, recommended for inclusion in BWMA.	EPA concurred with facility's recommendations.	Yes. Container was removed in 1991.	CA600: use RFA (May 7, 1992) at p. 36 CA650: use today's date.
15	Container Storage Area No. 1. Located in basement, used to store hazardous waste for over 11 years.	RFA. Potential release area. "Four manholes to the sewer and 14 to 15 drains in this area were sealed around 1988. The floor is now worn through. The facility has submitted a closure plan for this areas to the State and is awaiting approval. Further action should oversee the closure activities of this area to characterize any releases and to ensure effectiveness of closure activities." RFA at p. 36. ITW. No recorded releases, all manholes to the sewer and drains in the areas sealed around 1988, recommended for inclusion in the BWMA.	EPA concurred with recommendation to include in BWMA. Installation of downgradient GW monitoring wells as proposed in Workplan used to determine possible presence of plume. Investigation results did not suggest subsurface VOC contamination associated with this area. Question. Is this area a RCRA unit?	No.	<p align="center">? - MUST HAVE GOTT MIXED UP w/ OTHER CSA.</p>

This statement is at odds with statement in E/E

- NO, THIS IS CSA # 1 OR 2

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16	Lacquer Spray Booth. Located on the first floor.	RFA. Unknown release potential. ITW. No record of releases, located on the first floor, area decommissioned in Spring of 1991.	EPA concurred with facility's recommendation for no further action since AOC was located on first floor. See rationale for AOC 3 above and VCA letter at p. 5.	Yes. RFA indicates "booth was removed in 1991." RFA at p. 36. RFA Response indicates "[a]rea removed as part of decommissioning process in 1991." RFA Response at Appendix A.	CA600: use RFA (May 7, 1992) at p. 36 CA650: use today's date.
17	20,000 Gal. #4 Fuel Oil Underground Storage Tank. "Located beneath the basement of the eastern tip of Building 4." RFA Response at Appendix A.	RFA. UST reportedly abandoned in place by filling with cement. ITW. Abandoned in place by filling with cement slurry in 1981. Recommended for inclusion in the BWMA.	EPA concurred with recommendation to include in BWMA.	Yes. Abandonment in place is an interim measure. Also, available groundwater monitoring data does not suggest impact to soils or groundwater from fuel oil.	CA600: use RFA (May 7, 1992) at p. 36 CA650: use today's date.
18	Floor Spill Collection Sump. Basement sump collected all floor drain discharge except plating room waste.	RFA. Potential release. "Further action should determine the integrity of [the] floor and sample subsurface soil to determine whether there has been a release." RFA at p. 36. ITW. No record of releases, system "inactive and decommissioned (cleaned and flushed) due to removal of all process and storage areas from basement. No water or other fluids currently enter this system. Drains and sump are still in place." RFA Response at Appendix A. Recommended for inclusion to BWMA.	EPA concurred with recommendation to include in BWMA.	Yes. Decommissioning activities.	CA600: use RFA Response (May 1993) at Appendix A. CA650: use today's date.

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19	Nitric Acid Strip Unit Leak Barrel.	<p>RFA. "This AOC is a result of poor containment from AOC #10. A barrel was used to collect the dripping nitric acid and hydrogen peroxide. Further action should involve the investigation of the integrity of the floor beneath the barrel" with subsurface soils sampling as necessary. RFA at p. 36.</p> <p>ITW. "When full, the barrel was emptied into the acid tank." RFA Response at Appendix A. No reported releases, "[a]rea cleaned and drum removed in 1991 decommissioning process", recommended for inclusion in BWMA.</p>	EPA concurred with recommendation to include in BWMA.	Yes. Area was cleaned and drum removed in 1991 decommissioning process.	CA600: use RFA Response (May 1993) at Appendix A. CA650: use today's date.
20	10,000 Gal. Fuel Oil UST Formerly located at south end of property	<p>RFA. Potential release.</p> <p>ITW. No recorded releases, UST excavated and removed in 1988. No further action recommended.</p>	In VCA letter, because no records of removal exist, EPA could not agree. However, evidence of groundwater contamination would likely have shown up in downgradient monitoring wells.	Yes. "Tank was reportedly removed in 1988." RFA at p. 37. "[T]ank was excavated and removed in 1988." RFA Response at Appendix A.	CA600: use RFA (May 7, 1992) at p. 37 CA650: use today's date.
21	10,000 Gal. Gasoline UST Formerly located at south end of facility property.	<p>RFA. Potential release.</p> <p>ITW. No recorded releases, UST was excavated and removed in 1988. No further action recommended.</p>	In VCA letter, because no records of removal exist, EPA could not agree. However, evidence of groundwater contamination would likely have shown up in downgradient monitoring wells.	Yes. "Tank was reportedly removed in 1988." RFA at p. 37. "[T]ank was excavated and removed in 1988." RFA Response at Appendix A.	CA600: use RFA (May 7, 1992) at p. 37 CA650: use today's date.

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22-25	Safety-Kleen Units consisting of four "units" used for cleaning parts and equipment in a closed-loop self-contained system. Managed by independent subcontractor, Safety-Kleen.	RFA. No further action recommended. ITW. No further action recommended.	EPA concurs.	No.	
26	Assembly Machines manufacturing equipment located on first floor	RFA. No further action recommended. ITW. No further action recommended.	EPA concurs	No.	
27	Area of Compressor Oil Leak area where compressor leaked oil to the outside of the west side of the main building	RFA recorded a release to soil. Recommended sampling of surface soils. ITW. Short term, low volume release to pavement. No further action recommended.	In VCA letter, EPA concluded that this AOC likely did not pose a Corrective Action risk.	No.	

For info on what may constitute and interim measures,

See USEPA, RCRA Corrective Action Interim Measure Guidance, Interim Final, June, 1998, EPA/530-SW-88-029, p. 4.

See also, USEPA, Stabilization Technologies for RCRA Corrective Actions, August 1991, EPA/625/6-91/026; Federal Register, Corrective Action for Releases from Solid Waste Management Units at Hazardous Waste Management Facilities, Proposed Rule (ANPR), Wednesday May 1, 1996; and, Subpart E: Hazardous Substance Response, 40 CFR 300.400 et seq. (providing regulations on Superfund's Removal program).