

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: M SWIFT & SONS, INC.  
Facility Address: 10 LOVE LANE, HARTFORD, CT 06112  
Facility EPA ID #: CTD 001139054

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).

**Migration of Contaminated Groundwater Under Control  
Environmental Indicator (EI) RCRIS code (CA750)**

Page 2

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.

  x   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): The groundwater classification for this area is "GB" not suitable for direct human consumption due to waste discharges. The groundwater is within a highly urbanized area of intense industrial activity where public water is available. See July 17, 1997 report to Donna Seresin, CTDEP. Refer also to the Feb. 20, 1998 follow-up report.

Reports dated June 26, 1995, July 27, 1995, January 3, 1997, and January 17, 1997, refer to the company achieving a zero discharge close-loop system. There has been no wastewater discharge to the ground from the machines since February, 1995.

The vacuum matallizing chambers have not been used since June 1995 due lack of work and sales. The gold plating operation does not run continuously due slow down in sales.

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Footnotes:

<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).





**Migration of Contaminated Groundwater Under Control**  
**Environmental Indicator (EI) RCRIS code (CA750)**  
Page 5

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)?

\_\_\_\_\_ 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 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): \_\_\_\_\_  
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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.

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 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): \_\_\_\_\_  
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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.



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).

X 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 M. SWIFT & SONS, INC. facility, EPA ID # CTD001139054, located at 10 Love Lane, HARTFORD 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.

*Please note: Marcie Santa Ana is the contact person. JQ 9/12/00*

Completed by (signature) *Marcie Santa Ana* Date August 24, 2000  
(print) MARCIE SANTA ANA  
(title) CHEMIST

Supervisor (signature) *Matthew R. Hongland* Date 12/8/00  
(print) Matthew R. Hongland  
(title) Chief, RCRA Corrective Action Section  
(EPA Region or State) EPA Reg. I.

*Completed by: Juan A. Peyer Environmental Scientist Date: Sept. 12, 2000*

Locations where References may be found:

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

Contact telephone and e-mail numbers

(name) \_\_\_\_\_  
(phone #) \_\_\_\_\_  
(e-mail) \_\_\_\_\_

# M. SWIFT & SONS

INC.

GOLD LEAF MANUFACTURERS

TEN LOVE LANE

HARTFORD, CONNECTICUT 06141-0150

U. S. A.

July 17, 1997

Ms. Donna Seresin  
Connecticut DEP  
Bureau of Waste Management  
79 Elm Street  
Hartford, Connecticut 06106-5127

Re: Generator Closure Requirements  
for two former hazardous waste storage  
areas identified by Buzz Devine.  
**EPA ID# CTD 001139054**

Dear Ms. Seresin:

The two areas in which Buzz Devine observed as hazardous waste storage areas during his RCRA inspection in June 1983, are located on the left and right side of the 4- car garage adjacent to the loading dock.

## History

The 14 unidentified drums stored in a fenced, partial bermed storage area, observed by Buzz Devine, in 1983, were empty drums to be picked up and sold to Reliable Barrel for \$ 1.00 to \$ 5.00 a piece depending on the condition of the drums. That area is located on the left side of the garage which was also the location of two 5000 gallon underground tanks that needed to be cleaned and abandoned in place in 1989 per Connecticut regulations.

On August 30, 1989, M. Swift & Sons, Inc. contracted Aaron Environmental Specialists to conduct a soil assessment to determine the presence of contamination within the soils, adjacent to the tanks prior to abandonment as per Connecticut regulations. The assessment included the following:

1. Drilling of 4 boreholes
2. Vapor analysis during the drilling
3. Sampling and Lab analysis of each sample from the boreholes.



MAIN OFFICE & FACTORY: HARTFORD, CONN.

BRANCH OFFICES: CHICAGO • ST. LOUIS • LOS ANGELES

M. SWIFT & SONS (CANADA) LTD., MONTREAL, CANADA • M. SWIFT & SONS, BRUSSELS, BELGIUM

TEL: 203-522-1181 • CABLE ADDRESS: SWIFTSONS • TELEX: 99257

### History

The groundwater classification for this area is "GB" not suitable for direct human consumption due to waste discharges. The ground water is within a highly urbanized area of intense industrial activity where public water supply is available.

Laboratory results confirm a low level of Ethyl Alcohol in groundwater ( 3.7 ppm). No Chlorinated organics (EPA Method 601) were identified. All soil samples were free of Ethyl Alcohol and Isopropyl Alcohol which were stored in the two underground tanks.

After the two old tanks were cleaned and filled with gravel, two new 5000 gallon underground tanks were installed in December 1989 to contain Ethyl Alcohol and MEK.

To date, one underground tank contains Ethyl Acetate in place of MEK.

### Closure

In order to meet the generator closure requirements for the two former hazardous waste storage areas, we need to verify that the soils are clean.

On June 30, 1997, four samples were taken from the two identified areas and sent out to Phoenix Laboratories for MEK and 8-Metal Analysis. The soil samples were taken from 6 inches or more below the surface to avoid bias due to volatilization.

Results showed no MEK detected from all the soil samples. The metal compounds analyzed except Arsenic were below the Residential Exposure Criteria.

We believe that the Arsenic compound found were present at a naturally occurring concentration. We do not have any arsenic in the chemicals we use in our formulations since most of our products are stamped on toys, pencils, plastic bags used for food storage and clinical materials.

### Data

1. Samples #1 and #2 were taken from the storage area located between the right side of the garage and the ramp going to the loading dock. Dimension 12' x 4'. Photographs were taken during sample collection.
2. Samples #3 and #4 were taken from the storage area located on the left side of the garage where the groundwater monitoring and soil sampling were done in 1989. Dimensions are 12' x 24'. Photographs were also taken.

M. SWIFT & SONS, INC.

Data

3. Copies of analysis from Phoenix Laboratories attached.

This concludes the generator closure requirements for former hazardous waste storage areas as required by 22a-449 (c) - 102 (a) of the Regulation of Connecticut State Agencies.

Any question may be directed to Marcie or M.A. Swift.

Very truly yours,

Marcie Santa Ana  
Chemist



M.A. Swift



President

Generator Closure Results Compared To Direct Exposure Criteria  
 (22a - 133K) Inorganic and Organic Compounds In Soil

M. Swift & Sons, Inc.  
 10 Love Lane  
 Hartford, Connecticut 06141

Constituents	Closure Sample Designation & Results				Residential Direct Exposure Criteria	MDL
	#1	#2	#3	#4		
Inorganic Compounds - Results in mg/kg						
Barium	90.6	71.7	51.6	54.2	4700	0.10
Cadmium	7.3	9.3	1.7	1.5	34	0.10
Chromium	28.9	20.4	10.0	15.1	100	0.10
Lead	206.0	173.0	14.7	17.2	500	0.10
Mercury	0.13	BDL	BDL	BDL	20	0.10
Arsenic	13.1	10.5	19.8	16.8	10	0.50
Selenium	BDL	BDL	BDL	BDL	340	1.0
Silver	46.6	119.0	1.0	BDL	340	0.10
Organic Compounds - Results in ug/kg - Parts / Billion						
MEK	BDL	BDL	BDL	BDL	Not Applicable	0.10

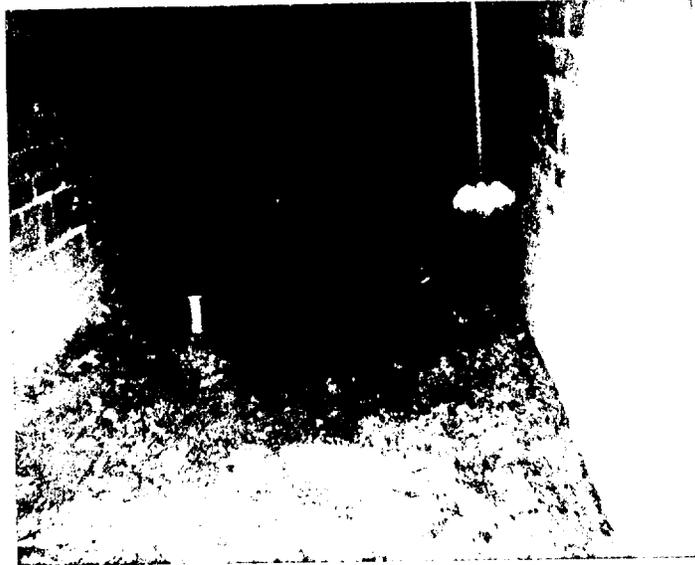
Note:

1. BDL - Below Detectable Limit
2. MDL - Maximum Detectable Limit
3. Soil samples were collected on 6/30/97 and analyzed by Phoenix Laboratory of Manchester, Connecticut.
4. The Proposed standards were obtained from Connecticut DEP's " Remediation Standard Regulations "(22a - 133K)"

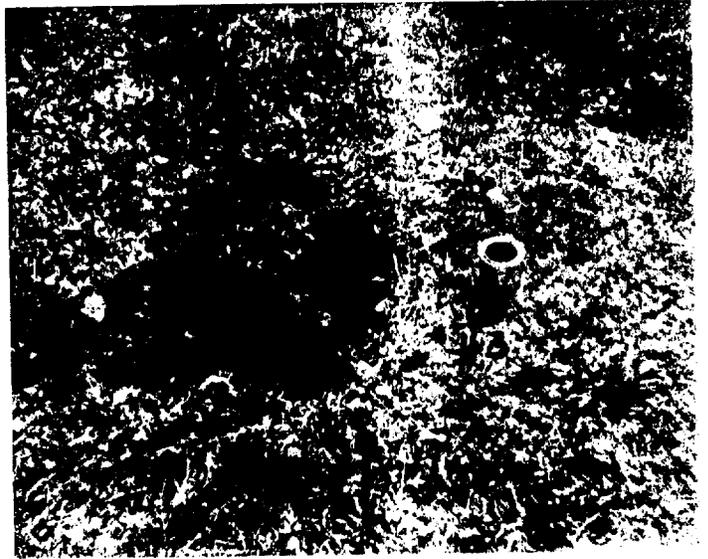


# 1 P. 200 - SAMPLES  
M. SWIFT & SONS NC 6/30/97

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# 1 P. 200 - SAMPLES  
M. SWIFT & SONS NC 6/30/97



#3 & #4 SOIL SAMPLES  
M. SWIFT & SONS, INC. 6/30/97

#3 SOIL SAMPLE  
M. SWIFT & SONS, INC. 6/30/97



#3 & #4 SOIL SAMPLES  
M. SWIFT & SONS, INC. 6/30/97

# M. SWIFT & SONS

INC.

GOLD LEAF MANUFACTURERS

TEN LOVE LANE

HARTFORD, CONNECTICUT 06141-0150

U. S. A.

February 20, 1998

Ms. Donna Seresin  
Connecticut DEP  
Bureau of Waste Management  
79 Elm Street  
Hartford, Connecticut 06106-5127

Re: Generator Closure Requirements  
For Hartford EPA I.D. # CTD 001139054

Dear Ms. Seresin:

We had more arsenic analysis done on soil samples taken:

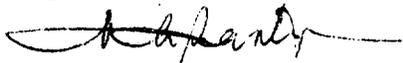
- A. Front side of the building by Love Lane
- B. Behind shipping department near Garden Street
- C. The lot on the right side of the building
- D. The right side of the four car garage-bermed storage area
- E. The left side of the four car garage-loading dock

Results showed that all five samples were below the Residential Direct Exposure Criteria of 10 ppm. D & E samples were taken from the two former hazardous waste storage areas identified by Buzz Devine.

Data:	Sample ID	Arsenic content in PPM
	A	2.82
	B	2.34
	C	2.04
	D	1.84
	E	4.10
	CT. RDE CRITERIA	10.00

Attached are the analysis done by Phoenix Lab. Inc.

Very truly yours;

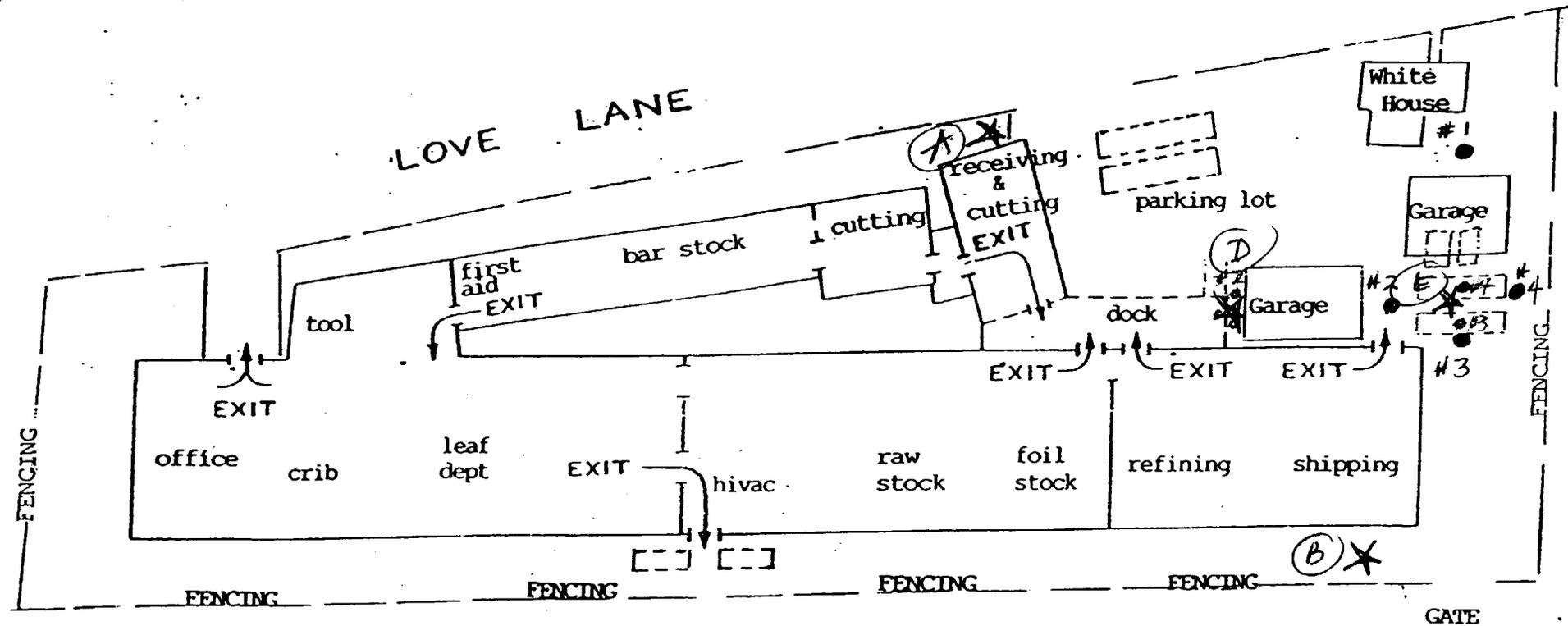
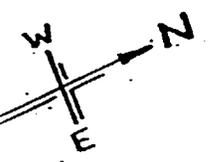


Marcie Santa Ana  
Chemist



MAIN OFFICE & FACTORY: HARTFORD, CONN.

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TEL: 203-522-1181 • CABLE ADDRESS: SWIFTSONS • TELEX: 99257



GARDEN

ST.

FIRST FLOOR

- 1989 BOREHOLES
- 1997 SOIL SAMPLES  
6/30/97
- ★ 1997-98 SOIL SPLS  
2/20/98



Environmental Laboratories, Inc.

587 East Middle Turnpike, P.O. Box 418, Manchester, CT 06040  
Tel. (860) 645-1102 Fax (860) 645-0823

# Analysis Report

November 25, 1997

FOR: Attn: Ms. Marcie Santa Ana  
M. Swift & Sons, Inc.  
10 Love Lane  
Hartford, CT 06141

## Sample Information

Matrix: SOLID  
Location Code: M-SWIFT  
Project Code: A  
P.O.#: 13064

## Custody Information

Collected by:  
Received by: SW  
Analyzed by: see below

## Date

10/29/97  
10/29/97

## Time

10:40  
17:15

## Laboratory Data

Client ID: LOVE LANE SOIL - SIDE

Phoenix I.D. AB59916

Parameter	Result	MDL	Units	Date	by	Reference
Arsenic (Furnace)	2.82	0.50	mg/kg	11/24/97	RS	SW7060/206.2
Total Metals Digest	Completed			10/29/97	A/V	SW846 - 3050

### Comments:

ND=Not detected MDL = Minimum Detectable Limit BDL = Below Detection Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

*John M. Schreiber*  
John M. Schreiber, Laboratory Director  
November 25, 1997



Environmental Laboratories, Inc.  
 587 East Middle Turnpike, P.O. Box 418, Manchester, CT 06040  
 Tel. (860) 645-1102 Fax (860) 645-0823

# Analysis Report

November 25, 1997

FOR: Attn: Ms. Marcie Santa Ana  
 M. Swift & Sons, Inc.  
 10 Love Lane  
 Hartford, CT 06141

## Sample Information

Matrix: SOLID  
 Location Code: M-SWIFT  
 Project Code: B  
 P.O.#: 13064

## Custody Information

Collected by:  
 Received by: SW  
 Analyzed by: see below

## Date

10/29/97  
 10/29/97

## Time

10:30  
 17:15

## Laboratory Data

Client ID: LOVE LANE SOIL BEHIND SHIPPING

Phoenix I.D. AB59915

### Parameter

### Result

### MDL

### Units

### Date

### by

### Reference

Arsenic (Furnace)	2.34	0.50	mg/kg	11/24/97	RS	SW7060/206.2
Total Metals Digest	Completed			10/29/97	A/V	SW846 - 8050

### Comments:

ND=Not detected MDL = Minimum Detectable Limit BDL = Below Detection Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

*John M. Schreiber*  
 John M. Schreiber, Laboratory Director  
 November 25, 1997



Environmental Laboratories, Inc.

587 East Middle Turnpike, P.O. Box 418, Manchester, CT 06040  
Tel. (860) 645-1102 Fax (860) 645-0823

# Analysis Report

October 02, 1997

FOR: Attn: Marci Santana  
M. Swift & Sons Inc  
10 Love Lane  
Hartford CT 06141

Sample Information

Matrix: SOIL  
Location Code: SPECIAL C  
Project Code: 60 LOVELANE  
P.O.#: 12987

Custody Information

Collected by:  
Received by: SW  
Analyzed by: see below

Date

09/23/97  
09/24/97

Time

10:00  
16:38

## Laboratory Data

Client ID: GROUND SOIL

Phoenix I.D. AB56826

Parameter	Result	MDL	Units	Date	by	Reference
Arsenic (Furnace)	2.04	0.50	mg/kg	09/26/97	RS	SW7060/206.2
Mercury	0.12	0.10	mg/kg	09/26/97	RS	SW-7470
Silver	BDL	0.10	mg/Kg	10/01/97	EK	6010/E200.7
Barium	32.7	0.10	mg/Kg	10/01/97	EK	6010/E200.7
Cadmium	1.60	0.10	mg/Kg	10/01/97	EK	6010/E200.7
Chromium	12.6	0.10	mg/Kg	10/01/97	EK	6010/E200.7
Lead	14.7	0.10	mg/Kg	10/01/97	EK	6010/E200.7
Selenium	BDL	1.0	mg/Kg	10/01/97	EK	6010/E200.7
Mercury Digestion	Completed			09/26/97	DF	SW7471
Total Metals Digest	Completed			09/25/97	E/T	SW846 - 3050

Comments:

ND=Not detected MDL = Minimum Detectable Limit BDL = Below Detection Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

John M. Schreiber, Laboratory Director  
October 02, 1997



Environmental Laboratories, Inc.  
 587 East Middle Turnpike, P.O. Box 418, Manchester, CT 06040  
 Tel. (860) 645-1102 Fax (860) 645-0823

**Analysis Report**  
 January 23, 1998

FOR: Attn: Ms. Marcie Santa Ana  
 M. Swift & Sons, Inc.  
 10 Love Lane  
 Hartford, CT 06141

Sample Information

Matrix: SOLID  
 Location Code: M-SWIFT  
 Project Code: D  
 P.O.#: 13194

Custody Information

Collected by:  
 Received by: SW  
 Analyzed by: see below

Date      Time

01/19/98      10:00  
 01/20/98      16:30

Laboratory Data

Client ID: SIDE SOIL BERMED STORAGE AREA      Phoenix I.D. AB68144

Parameter

Result      MDL      Units      Date      by      Reference

Arsenic (Furnace)      1.84      0.50      mg/kg      01/22/98      RS      SW7060/206.2  
 Total Metals Digest      Completed                01/20/98      VS      SW846 - 3050

Comments:

ND=Not detected    MDL = Minimum Detectable Limit    BDL = Below Detection Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

*John M. Schreiber*  
 John M. Schreiber, Laboratory Director  
 January 23, 1998



Environmental Laboratories, Inc.

587 East Middle Turnpike, P.O. Box 418, Manchester, CT 06040  
Tel. (860) 645-1102 Fax (860) 645-0823

# Analysis Report

January 23, 1998

FOR: Attn: Ms. Marcie Santa Ana  
M. Swift & Sons, Inc.  
10 Love Lane  
Hartford, CT 06141

## Sample Information

Matrix: SOLID  
Location Code: M-SWIFT  
Project Code: E  
P.O.#: 18194

## Custody Information

Collected by:  
Received by: SW  
Analyzed by: see below

## Date

01/19/98  
01/20/98

## Time

10:00  
16:30

## Laboratory Data

Client ID: FRONT SOIL *LOADING DOCK*

Phoenix I.D. AB68148

### Parameter

### Result

### MDL

### Units

### Date

### by

### Reference

Arsenic (Furnace)

4.10

0.50

mg/kg

01/22/98

RS

SW7060/206.2

Total Metals Digest

Completed

01/20/98

VS

SW846 - 3050

### Comments:

ND=Not detected MDL = Minimum Detectable Limit BDL = Below Detection Limit

If there are any questions regarding this data, please call Phoenix Client Services at extension 200.

John M. Schreiber, Laboratory Director

January 23, 1998

# M. SWIFT & SONS

INC.

GOLD LEAF MANUFACTURERS

TEN LOVE LANE

HARTFORD, CONNECTICUT 06141-0150

U.S.A.

*copy*  
*Murphy's*

June 26, 1995

State of Connecticut  
Department of Environmental Protection  
Water Management Bureau  
79 Elm Street  
Hartford, Connecticut 06106-5127

Attn: Christine Yario  
Senior Sanitary Engineer

Dear Ms. Yario:

M. Swift & Sons, Inc. would like to withdraw one **Water Management Permit** application No. 94-501 for renewal of **Permit No. SP0001336** submitted in October 1994.

As stated in the application, the company goal is to achieve a zero discharge system. All the water within the gold plating process is recycled in a close-loop system until the presence of oil or bacterial contamination start to affect the quality of the end product.

At this point, the wastewater will be processed through the gold recovery operation which consists of five to eight ion-exchange resin columns to render the water non-hazardous prior to evaporation.

Since December 1994, the only time treated wastewater was discharged from this department was in February 1995. An evaporator will now be used. Attached is the non-hazardous waste certification that is required from us.

The bronzing department and the vacuum metallizing chambers require minor non-contact cooling water to cool down the rolls and the electrical and vacuum pumps. These will be recycled through cooling tower, thus, eliminating non-contact cooling water discharges.



MAIN OFFICE & FACTORY: HARTFORD, CONN.

BRANCH OFFICES CHICAGO • ST. LOUIS • LOS ANGELES

M. SWIFT & SONS (CANADA) LTD. MONTREAL CANADA • M. SWIFT & SONS S.A. NOSSEGEM ZAVENTEM, BELGIUM

M. SWIFT & SONS. INC.

JUNE 26, 1995

Dept. of Environmental Protection  
Continued...

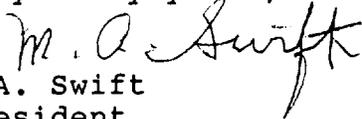
There are two very minor discharges to the sewer that need to be addressed.

1. About 150 gallons of water will be discharged from one air conditioner cooling tower, once a year, in the fall. The water may contain one percent Chlorox and 0.1 percent Trisodium Phosphate.
2. A large humidifier chamber in the basement where the air is blown through and cooled down by a water mist contains 200 gallons of city water that needs to be discharged once a week. The discharged water may contain some airborne dirt only, since no chemicals are added to the water. There is no filter in the chamber.

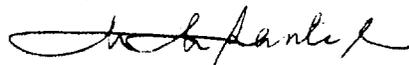
Please let us know what needs to be done and what type of permit may be needed to cover these very minor discharges.

Any questions may be directed to Marcie Santa Ana at 522-1181. We hope to hear from you soon.

Very truly yours;

  
M.A. Swift  
President

MAS/hm

  
Marcie Santa Ana  
Chemist

# M. SWIFT & SONS

INC.

GOLD LEAF MANUFACTURERS

TEN LOVE LANE

HARTFORD, CONNECTICUT 06141-0150

U. S. A.

June 15, 1995

Ms. Christine Yario  
Water Management Bureau/PERD Division  
Department of Environmental Protection  
79 Elm Street  
Hartford, Connecticut 06106

## NON-HAZARDOUS WASTE CERTIFICATION

M. Swift & Sons, Inc. hereby certifies the wastewater that is directed to an evaporator from the Gold Recovery operation prior to treatment is characterized as non-hazardous in accordance with the Federal Regulations 40CFR 262.11 - Hazardous Waste Determination.

Respondent shall submit this certification for the wastestream mentioned above on an annual basis. If any new chemicals or wastestreams are added, a recertification is required.

M. Swift & Sons, Inc.

  
M.A. Swift  
President

MAS/hm



MAIN OFFICE & FACTORY: HARTFORD, CONN.

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M. SWIFT & SONS (CANADA) LTD., MONTREAL, CANADA • M. SWIFT & SONS, BRUSSELS, BELGIUM

TEL: 203-522-1181 • CABLE ADDRESS: SWIFTSONS • TELEX: 99257

M. SWIFT & SONS  
INC.

GOLD LEAF MANUFACTURERS

TEN LOVE LANE

HARTFORD, CONNECTICUT 06141-0150

U. S. A.

*Marcie Santa Ana copy*

July 27, 1995

State of Connecticut  
Dept. of Environmental Protection  
Water Management Bureau  
79 Elm Street  
Hartford, Connecticut 06106-5127

Attn: Christine Yario  
Senior Sanitary Engineer

Dear Ms. Yario:

Enclosed is a copy of a letter from Mr. Randel E. Stong.,  
Professional Engineer from Fuss & O'Neill, Inc. confirming that our  
discharges are below the limits requiring formal registration for  
non contact cooling water and boiler blowdown.

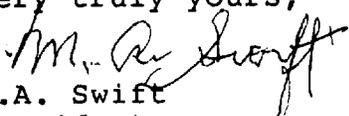
Three sets of samples were sent out to York Analytical Laboratory  
for water analysis and copies of this letter and Randel Stong's  
letter in our files for future references.

Attached is the revised process water line drawing for wastewater  
discharges illustrating the changes made when we switched to zero  
discharge system.

We have no daily discharge of wastewater. Instead, we discharge  
a maximum of 300 gallons of cooling water **once a week** from the  
humidifier and 250 gallons from the cooling tower **once a year**.

We will be closed for shutdown from July 31, until August 13th.  
If you need more information, we will be open on August 14th. Any  
questions may be directed to the undersigned or Marcie Santa Ana  
at 522-1181.

Very truly yours;

  
M.A. Swift  
President

MAS/hm



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TEL: 203-522-1181 • CABLE ADDRESS: SWIFTSONS • TELEX: 98257



Fuss & O'Neill Inc. Consulting Engineers

146 Hartford Road, Manchester, CT 06040-5921  
TEL 203 646-2469 FAX 203 643-6313

1200 Converse Street, Longmeadow, MA 01106-1721  
TEL 413 567-9886 FAX 413 567-8936

Solid Waste Management	Environmental Engineering
Industrial/Hazardous Waste Management	Wastewater Management
Stream Impact Analysis	Site Planning/Engineering
Water Resources Engineering	Hydrogeology
Transportation Engineering	Park Design
Environmental Field Services	Surveying

July 20, 1995

Ms. Marcie Santa Ana  
M. Swift & Sons  
10 Love Lane  
Hartford, CT 06112

Dear Ms. Santa Ana;

I enjoyed meeting with you and discussing your water discharge permitting requirements last Tuesday, July 18, 1995. This letter is written to address the discharge of both noncontact cooling water and boiler blowdown at the Love Lane facility.

While the general permit for the cooling water discharges would apply to your facility, formal registration is required only in the case of discharge to a surface water body, or to a sewer system if the discharge is greater than 5,000 gallons per day. A similar situation exists for boiler blowdown. As such, formal registrations for these discharges, with the attendant certifications by a Professional Engineer, are not necessary for your facility. I have confirmed this in a telephone conversation with Christine Yario.

During my visit to your facility, I observed and generally confirmed that your discharges are below the limits requiring registration.

Please note that your facility is automatically covered under both of these general permits even though registration is not required. The conditions of the permits must therefore be observed, specifically the sampling and analysis, effluent limitations, and management practice and control requirements. I am attaching copies of both of these general permits for your files.

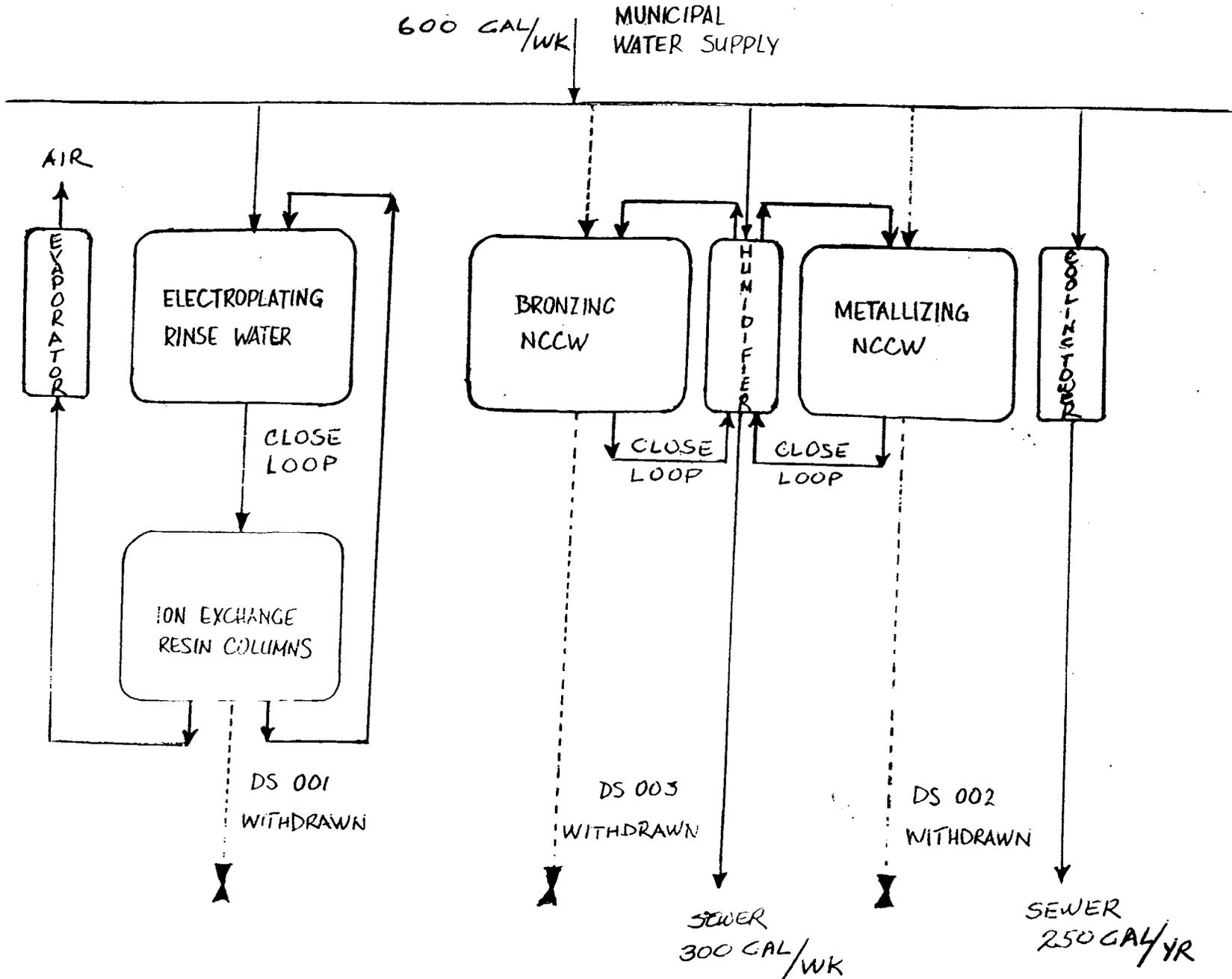
You should retain this letter in your files as evidence of due diligence, together with the copies of the permits and all analytical data, for examination by the DEP in the event of an inspection.

I look forward to an opportunity in the future to assist M. Swift & Sons in environmental compliance matters if such an occasion arises. Please feel free to call me if you have any further questions or comments, and I thank you for contacting Fuss and O'Neill, Inc. in this matter.

Sincerely,

Randel E. Stong, P.E.

ATTACHMENT B  
PROCESS WATER



LINE DRAWING  
22a-430-4(c)(15)  
M SWIFT & SONS, INC  
7-27-95

# M. SWIFT & SONS INC.

GOLD LEAF MANUFACTURERS  
TEN LOVE LANE  
HARTFORD, CONNECTICUT 06141-0150  
U. S. A.

January 03, 1997

Page 1 of 2

State of Connecticut  
Dept. of Environmental Protection  
Water Management Bureau  
79 Elm Street  
Hartford, Connecticut 06106-5127

Attn: Charles C. Nezianya

Dear Mr. Nezianya:

M. Swift & Sons, Inc. does not have an active wastewater discharge from the Flawless Gold Electroplating Department since February 1995 when we used to have a Water Management Permit No. SPO001336.

We have achieved our goal of zero discharge system. All the water within the gold electroplating process is recycled in a closed loop system. We now have a totally enclosed facility.

The spray rinse waste water used to rinse out the electroplating drag-outs goes through 5- ion exchange resin columns in our gold recovery operation before reuse. This gold cyanide complex recovery process renders the wastewater non-hazardous.

In the event when the wastewater could no longer be used for rinsing due to airborne dirt or contamination, the non-hazardous wastewater is directed to the evaporator located at the north end part of the room.

The evaporator is made out of stainless steel steam heated to above the boiling point of water. In case of evaporator malfunction, a collection tank is installed to store any wastewater until the evaporator is operational again. The evaporator is exempt from RCRA and Air Permitting requirements because the wastewater is characterized as non-hazardous after going through the gold recovery operation prior to the introduction to the evaporator.



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TEL: 203-522-1181 • CABLE ADDRESS: SWIFTSONS • TELEX: 99257

M. SWIFT & SONS, INC.

Page 2 of 2

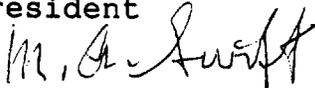
Wastewater discharge continued:

Attached is the non-hazardous waste certification and the reused process water line drawing for wastewater discharges illustrating the changes made when we achieved the zero discharge system.

Any questions may be directed to Marcie Santa Ana at 522-1181.

Very truly yours;

M.A. Swift  
President

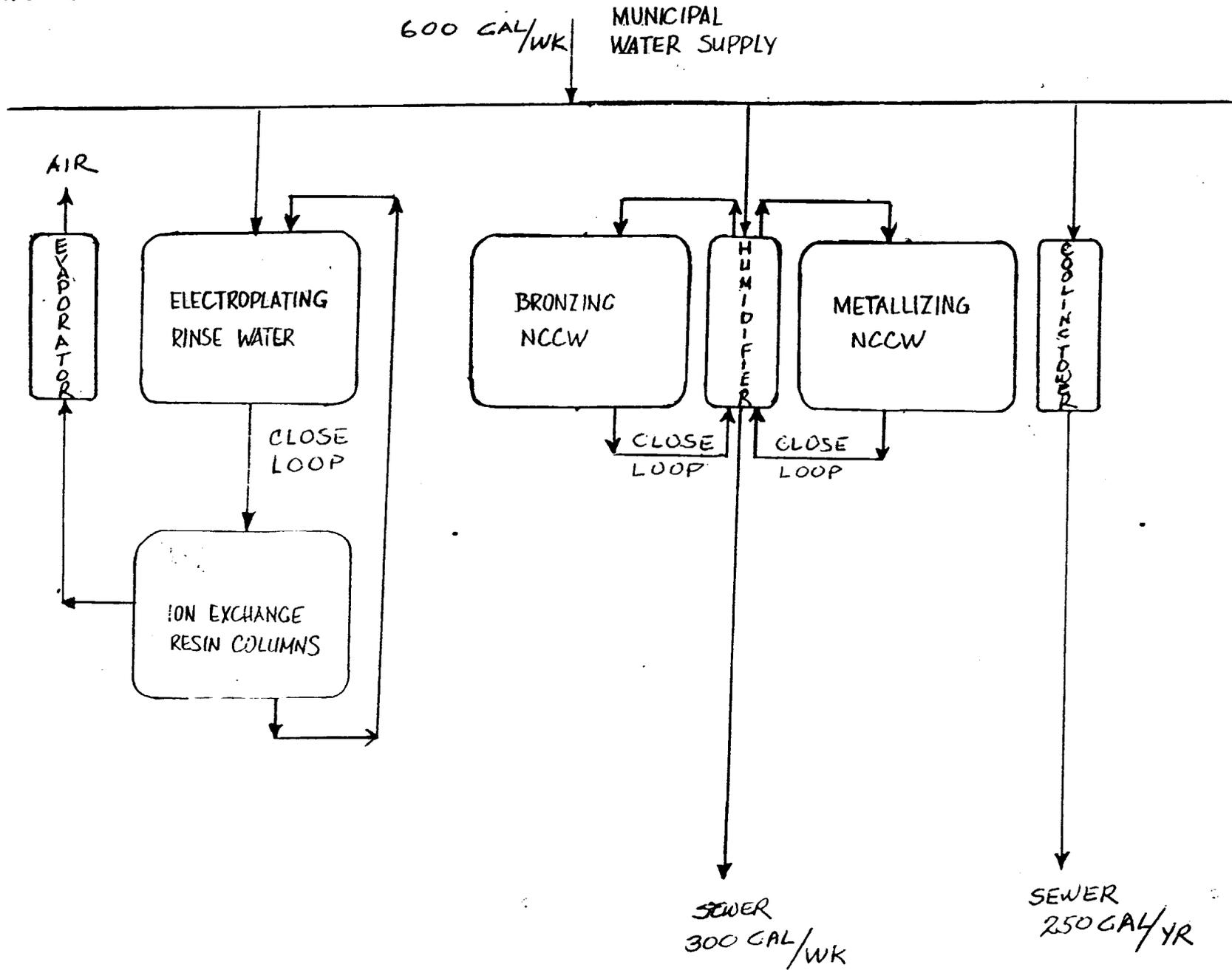


Marcie Santa Ana  
Chemist



MAS/hm

ATTACHMENT # 3  
PROCESS WATER



LINE DRAWING  
22 a-430-4(c)(15)  
M SWIFT & SONS, INC

# M. SWIFT & SONS INC.

GOLD LEAF MANUFACTURERS  
TEN LOVE LANE  
HARTFORD, CONNECTICUT 06141-0150  
U. S. A.

December 16, 1996

Industrial Permitting Engineer  
Bureau of Water Management/Permitting & Enforcement  
Department of Environmental Protection  
79 Elm Street  
Hartford, Connecticut 06106

M. Swift & Sons, Inc. hereby certifies the wastewater that is directed to an evaporator from the Gold Recovery operation prior to treatment is characterized as non-hazardous in accordance with Section 22a-449 (c) - 102 of the Regulation of Connecticut State Agencies, incorporating the Federal Regulations 40CFR 262.11 - Hazardous Waste Determination.

Respondent shall submit this certification for the wastestream mentioned above on an annual basis. If any new chemicals or wastestreams are added, a recertification is required.

M. Swift & Sons, Inc.

  
M.A. Swift  
President

MAS/hm



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# M. SWIFT & SONS INC.

GOLD LEAF MANUFACTURERS  
TEN LOVE LANE  
HARTFORD, CONNECTICUT 06141-0150  
U. S. A.

January 17, 1997

State of Connecticut  
Department of Environmental Protection  
Waste Water Management Bureau  
79 Elm Street  
Hartford, Connecticut 06101-5127

Attention: Charles C. Nezianya

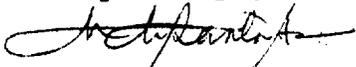
Dear Mr. Nezianya

Enclosed is a photograph of the evaporator we use in the Flawless Department. It is actually a soup kettle.

It is 42 inches in diameter and 36 inches deep, made out of stainless steel, steam heated to at least 225°F. It is totally enclosed and easy to operate and maintain.

Please let me know if you need more information.

Very truly yours;



Marcie Santa Ana  
Chemist

MSA/HM



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# M. SWIFT & SONS

GOLD LEAF MANUFACTURERS  
TEN LOVE LANE  
HARTFORD, CONNECTICUT 06141-0150  
U. S. A.

January 17, 1997

State of Connecticut  
Department of Environmental Protection  
Waste Water Management Bureau  
79 Elm Street  
Hartford, Connecticut 06101-5127

Attention: Charles C. Nesianya

Dear Mr. Nesianya:

Enclosed is a photograph of the evaporator we use in the Flawless Department. It is actually a soup kettle.

It is 48 inches in diameter and 36 inches deep, made out of stainless steel, steam heated to at least 225°F. It is totally enclosed and easy to operate and maintain.

Please let me know if you need more information.

Very truly yours;

  
Marcie Santa Ana  
Chemist

MSA/HM



MAIN OFFICE & FACT

BRANCH OFFICES CHICAGO

M. SWIFT & SONS (CANADA) LTD. MONTREAL, CANADA

TEL: 203-522-0000 • CABLE ADDRESS: SWIFTSONS • TELEX: 689257

# M. SWIFT & SONS INC.

GOLD LEAF MANUFACTURERS  
TEN LOVE LANE  
HARTFORD, CONNECTICUT 06141-0150  
U. S. A.

December 16, 1996

Industrial Permitting Engineer  
Bureau of Water Management/Permitting & Enforcement  
Department of Environmental Protection  
79 Elm Street  
Hartford, Connecticut 06106

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M. Swift & Sons, Inc.

  
M.A. Swift  
President

MAS/hm



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