

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: Sanitary Dash Manufacturing Company
Facility Address: River Street, North Grosvenordale, CT
Facility EPA ID #: CTD001153840

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**"¹ 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 monitoring at Sanitary Dash Manufacturing Company (SD) has been conducted since 1984, when monitoring well B-1 was installed in the footprint of and B-2 was installed upgradient of the former surface impoundments, following removal of contaminated soil from the impoundments (see attached Figure 1). Six additional wells (GZ-1 through GZ-6) were installed in 1990 as part of the SD's "Post Closure Part B Application". In 1997, three additional wells (GZ-7 through GZ-9) and four piezometers (PZ-1 through PZ-4) were installed. In 1999, two deep wells (GZ-4D and GZ-8D) were installed and GZ-4, which had been consistently dry, was replaced. Piezometers PZ-5 and PZ-6 were also installed.

Quarterly groundwater monitoring was conducted from March 1984 to 1996, when SD gained approval from CT Department of Environmental Protection (CT DEP) to reduce to a semi-annual monitoring frequency. Monitoring began on wells B-1 and B-2. Then, following the installation of wells GZ-1 through GZ-6 in 1990, wells GZ-5 and GZ-6 were included in groundwater monitoring. Analytical parameters in 1984 were pH, specific conductance, nickel, iron, zinc, copper, and chromium. Since 1985, metals analyses have included the 13 Priority Pollutant Metals. Periodically, groundwater samples have been analyzed for VOCs. In 1997, samples from selected wells were analyzed for SVOCs for inclusion in the 1998 Data Summary report and in 1999, samples from all wells were analyzed for VOCs as part of the RCRA Closure Equivalency Demonstration. Results of analyses for metals reported in the annual groundwater monitoring reports appear to have been performed on filtered samples. However, results of analyses reported in the 1998 Data Summary and the 2001 Closure Equivalency Demonstration were performed on unfiltered samples collected using EPA Region I's Low Stress (Low Flow) Purging and Sampling Procedure.

Exceedances of CT DEP GA/GAA Groundwater Protection Criteria (GWPC) were reported over time, as listed in Table 1 (attached). The data show a pattern of zinc concentrations above the CT DEP surface water protection criteria (SWPC) in well GZ-5, which is approximately 350 feet upgradient of the French River. However, elevated levels of zinc have not been reported in downgradient wells, closer to the French River. The SWPC is designed to be applied to wells immediately upgradient of the receiving surface water body. Therefore, it is unlikely that elevated zinc concentrations in well GZ-5 would adversely impact the surface water. Reported levels of zinc in groundwater at SD have never exceeded the GA/GAA GWPC.

Footnotes:

¹"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).

Isolated exceedances of the GA/GAA GWPC and/or the SWPC have also been reported for other constituents (as noted in Table 1). However, there does not appear to be a pattern in the reported groundwater exceedances that would indicate the presence of a groundwater plume. Only two exceedances of constituents related to SD operations were above the CT DEP GA/GAA GWPC (0.028 mg/l lead in well B-2 in Aug. 1999, and 0.111 mg/l Nickel in well B-2 in December 1 997). These exceedances were in a well that was upgradient of the SD facility. Thallium slightly exceeded GA/GAA criteria in wells GZ-2 and GZ-5 in samples collected in August 1999. However, these exceedances appear to be isolated and do not indicate the presence of a groundwater contaminant plume. In addition, thallium is naturally occurring and is not known to have been used in SD operations.

The SD facility is located in a GB classified area. GB indicates groundwater within a highly urbanized area of intense industrial activity that may not be suitable for direct human consumption due to waste discharges, spills, or leaks of chemicals or land use impacts. For this class of groundwater, CTDEP has established a goal of preventing further degradation of groundwater. The local health department (Windham County Health Department) and the local public water supply (Crystal Water of Danielson) report that all properties in the vicinity of SD are supplied by public water.

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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):

While isolated groundwater concentrations have been reported in excess of the CT DEP GA/GAA GWPC, the results do not suggest the presence of a groundwater plume. Therefore, migration of contaminated groundwater is considered to have stabilized.

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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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):

Groundwater at SD ultimately discharges to the French River. The French River is classified by CT DEP as D/B which means that it is not meeting water quality criteria or supporting one or more designated uses due to severe pollution.

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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)?

 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 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):

Concentrations of contaminants detected in groundwater in excess of appropriate groundwater "levels" are presented in Table 1 (attached). However, none of these exceedances is greater than 10 times the appropriate SWPC or GA/GAA GWPC. A review of data collected since 1984 shows that concentrations of contaminants in groundwater do not appear to be increasing over time. In addition, with the exception of zinc in well GZ-5, these exceedances appear to be isolated and are not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

There does appear to be a pattern of zinc concentrations above the CT DEP surface water protection criteria (SWPC) in well GZ-5, which is approximately 350 feet upgradient of the French River. However, elevated levels of zinc have not been reported in downgradient wells, closer to the French River. The SWPC is designed to be applied to wells immediately upgradient of the receiving surface water body. Therefore, elevated zinc concentrations in well GZ-5 are not anticipated to have unacceptable impacts to the receiving surface water, sediments, or eco-system.

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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):

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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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):

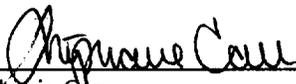
Additional groundwater monitoring may be performed by SD to evaluate compliance with the CT Remediation Standard Regulations. However, as no groundwater contaminant plume has been identified, EPA is not recommending that additional groundwater monitoring be conducted to confirm that migration of contaminated groundwater is under control.

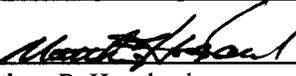
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8. Check the appropriate RCRIS status codes for the Migration of Contaminated Groundwater Under Control EI (event code CA750), and obtain Supervisor (or appropriate Manager) signature and date on the EI determination below (attach appropriate supporting 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 Sanitary Dash Manufacturing Company facility, EPA ID # CTD001153840, located at River Street in North Grosvenordale, 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)  Date 8/9/01
(print) Stephanie Carr
(title) RCRA Facility Manager

Supervisor (signature)  Date 8/13/01
(print) Matthew R. Hoagland
(title) Chief, RCRA Corrective Action Section
(EPA Region or State) EPA Region I

Locations where References may be found:

The following references are available at EPA's RCRA Record Center at 1 Congress Street, Suite 1100 (HBT), Boston, MA

- 1 Groundwater Monitoring Report dated February 1993 prepared by Environmental Laboratories, Inc. for Sanitary Dash Manufacturing Company
- 2 1993 Annual Groundwater Monitoring Report dated January 5, 1994 prepared by Environmental Laboratories, Inc. for Sanitary Dash Manufacturing Company
- 3 Groundwater Monitoring Program Annual Report dated February 1995 prepared by Environmetrix Research & Consulting for Sanitary Dash Manufacturing Company
- 4 Groundwater Monitoring Program Annual Report dated February 1996 prepared by Environmetrix Research & Consulting for Sanitary Dash Manufacturing Company
- 5 Groundwater Monitoring Program Annual Report dated December 1996 prepared by Environmetrix Research & Consulting for Sanitary Dash Manufacturing Company
- 6 Groundwater Monitoring Program Annual Report dated December 1997 prepared by Environmetrix Research & Consulting for Sanitary Dash Manufacturing Company

- 7 Data Summary Connecticut RSR Evaluation/RCRA Closure Equivalency Fieldwork Program, prepared by GZA GeoEnvironmental Inc. for Sanitary Dash Manufacturing Co., Inc. dated June 1998
- 8 RCRA Closure Equivalency Evaluation dated July 2001 prepared by GZA GeoEnvironmental, Inc. for Sanitary Dash Manufacturing Co., Inc.
9. Phase I Environmental Review, prepared by GZA GeoEnvironmental Inc. for Sanitary Dash Manufacturing Co., Inc. dated January 1997(available at EPA Region I).
10. Connecticut Remediation Standard Regulations, June 30, 1996

Contact telephone and e-mail numbers

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Table 1
Groundwater Data in Excess of Applicable Criteria

<i>Date</i>	<i>Well</i>	<i>Constituent</i>	<i>Concentration (mg/l)</i>	<i>GA/GAA GWPC (mg/l)</i>	<i>SWPC (mg/l)</i>	<i>Source of Data</i>
1992/Q1	GZ-5	Zinc	0.22	5	0.123	1
1992/Q3	GZ-5	Zinc	0.16	5	0.123	1
1993/June	GZ-5	Zinc	0.18	5	0.123	2
1993/Sept	GZ-5	Zinc	0.25	5	0.123	2
1994/Q1	GZ-5	Zinc	0.12	5	0.123	3
1994/Q2	GZ-5	Zinc	0.18	5	0.123	3
1994/Q3	GZ-5	Zinc	0.15	5	0.123	3
1995/Q2	GZ-5	Zinc	0.14	5	0.123	4
1995/Q3	GZ-5	Zinc	0.16	5	0.123	4
1995/Q4	GZ-5	Zinc	0.17	5	0.123	4
1996/April	GZ-5	Zinc	0.15	5	0.123	5
1997/Oct	GZ-5	Zinc	0.14	5	0.123	6
1997/Dec	B-2	Nickel	0.111	0.10	0.88	7
1997/Dec	GZ-5	Zinc	0.166	5	0.123	7

<i>Date</i>	<i>Well</i>	<i>Constituent</i>	<i>Concentration (mg/l)</i>	<i>GA/GAA GWPC (mg/l)</i>	<i>SWPC (mg/l)</i>	<i>Source of Data</i>
1998/Oct	GZ-5	Zinc	0.14	5	0.123	8
1999/ Aug	GZ-2	Thallium	0.0072	0.005	0.063	8
1999/Aug	GZ-5	Arsenic	0.0055	0.050	0.004	8
1999/Aug	GZ-5	Thallium	0.0055	0.005	0.063	8
1999/Aug	GZ-5	Zinc	0.127	5	0.123	8
1999/Aug	GZ-8S	Arsenic	0.0086	0.050	0.004	8
1999/Aug	B-2	Arsenic	0.005	0.050	0.004	8
1999/ Aug	B-2	Lead	0.028	0.015	0.013	8
1999/Aug	GZ-3	Arsenic	0.0056	0.050	0.004	8
1999/Aug	GZ-3	Copper	0.0559	1.3	0.048	8
1999/Aug	GZ-7	Arsenic	0.0109	0.050	0.004	8
2000/Fall	GZ-5	Zinc	0.12	5	0.123	8

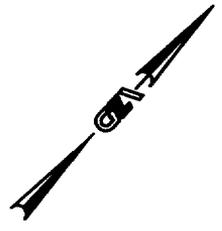
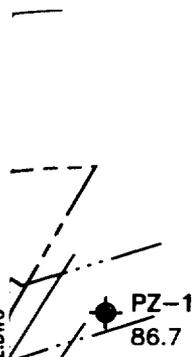
Notes:

- Constituents related to Sanitary Dash's previous operations at the site are in bold type.
- Elevated levels of TPH were detected in the December 1997 groundwater sampling in wells B-2, GZ-1, GZ-2, GZ-6, GZ-7, GZ-8, and GZ-9, but not in the subsequent round conducted in 1999. SVOC were sampled in December 1997 in wells B-1, GZ-5, GZ-6, and GZ-7, but no SVOCs were detected. All wells were sampled for TPH and VOCs in 1999; no TPH was detected and there were only two detections of VOCs (tetrachloroethene at 0.0018 mg/L at GZ-4S and at 0.0012 mg/L at GZ-

9). Based on these results, it does not appear that hazardous constituents were present in the elevated TPH detections and these TPH detections could not be replicated in subsequent sampling.

References:

- 1 Groundwater Monitoring Report dated February 1993 prepared by Environmental Laboratories, Inc. for Sanitary Dash Manufacturing Company
- 2 1993 Annual Groundwater Monitoring Report dated January 5, 1994 prepared by Environmental Laboratories, Inc. for Sanitary Dash Manufacturing Company
- 3 Groundwater Monitoring Program Annual Report dated February 1995 prepared by Environmetrix Research & Consulting for Sanitary Dash Manufacturing Company
- 4 Groundwater Monitoring Program Annual Report dated February 1996 prepared by Environmetrix Research & Consulting for Sanitary Dash Manufacturing Company
- 5 Groundwater Monitoring Program Annual Report dated December 1996 prepared by Environmetrix Research & Consulting for Sanitary Dash Manufacturing Company
- 6 Groundwater Monitoring Program Annual Report dated December 1997 prepared by Environmetrix Research & Consulting for Sanitary Dash Manufacturing Company
- 7 Data Summary Connecticut RSR Evaluation/RCRA Closure Equivalency Fieldwork Program, prepared by GZA GeoEnvironmental Inc. for Sanitary Dash Manufacturing Co., Inc. dated June 1998
- 8 RCRA Closure Equivalency Evaluation dated July 2001 prepared by GZA GeoEnvironmental, Inc. for Sanitary Dash Manufacturing Co., Inc.



NOTES:

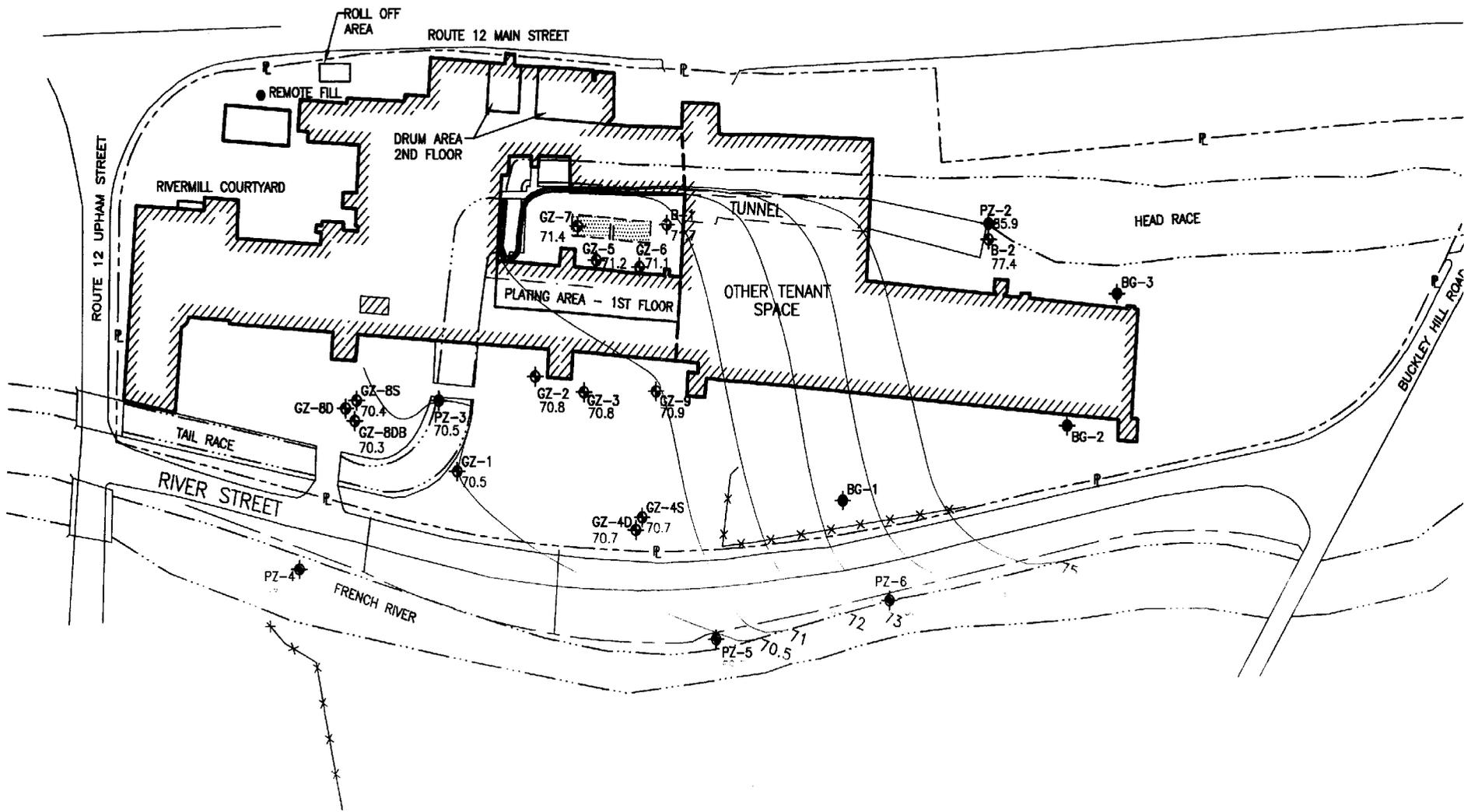
- 1) THE LOCATION OF THE BORINGS WERE APPROXIMATELY DETERMINED BY LINE OF SIGHT FROM EXISTING SITE FEATURES. THIS DATA SHOULD BE CONSIDERED ACCURATE ONLY TO THE DEGREE IMPLIED BY THE METHOD USED.
- 2) THE LOCATION OF THE WATER LINES AND SEWER LINES WERE TAKEN FROM MAP PROVIDED BY THOMPSON SEWER DEPARTMENT ENTITLED "PLAN & PROFILE RIVER STREET LATERAL" REVISION DATE AUGUST 16, 1971, ORIGINAL SCALE 1"=40'.
- 3) "GZ" BORINGS PERFORMED BY GZAD FROM SEPTEMBER 14, TO 18, 1990 AND DECEMBER 11, TO 19, 1997.
- 4) BASE MAP DEVELOPED FROM PLAN PROVIDED BY SANITARY DASH ENTITLED "SITE PLAN, SANITARY DASH MANUFACTURING COMPANY RIVER STREET, NORTH GROSVERNORDALE, CONNECTICUT" DATED DECEMBER, 1988, ORIGINAL SCALE 1"=50', PROJECT No. 88-510-10.

LEGEND:

- PROPERTY LINE
- APPROXIMATE LIMITS OF RIVER
- FENCE
- SLAB DEWATERING TRENCH (APPROXIMATE LOCATION)
- GROUNDWATER CONTOUR (feet)
- GZ-1 BORING/MONITORING WELL GROUNDWATER ELEVATION (feet)
- BG-1 BACKGROUND BORING LOCATION
- PZ-1 RIVER PIEZOMETER LOCATION GROUNDWATER ELEVATION (feet)
- FORMER SURFACE IMPOUNDMENT
- APPROXIMATE AREA OF FORMER VAPOR DEGREASER AREA

REV. No.	DESCRIPTION	BY	DATE	
	DESIGNED BY: DFJ	DFJ	DRAWN BY: MJS	
	CHECKED BY: TFS	TFS	SCALE: 1"=100'	
	REVIEWED BY: TFS	TFS	DATE: SEPT. 21, 2000	
			GZA GeoEnvironmental, Inc.	
SANITARY DASH MANUFACTURING COMPANY RCRA CLOSURE EQUIVALENCY DEMONSTRATION NORTH GROSVERNORDALE, CONNECTICUT		GROUNDWATER TABLE CONTOURS AUGUST 24, 1999		
PROJECT No. 42283				
FIGURE No. 2A				





BUCKLEY HILL ROAD