

U.S. EPA New England, Region 1

Explanation of Significant Differences

For

Linemaster Switch Superfund Site

Operable Unit 01

Woodstock, Connecticut

December 13, 2004

**DECLARATION
FOR THE
EXPLANATION OF SIGNIFICANT DIFFERENCES**

SITE NAME AND LOCATION:

The Linemaster Switch Superfund Site is located in the Town of Woodstock, Connecticut

IDENTIFICATION OF LEAD AND SUPPORT AGENCIES:

Lead Agency: **United States Environmental Protection Agency**
Support Agency: **Connecticut Department of Environmental Protection**

STATEMENT OF PURPOSE:

This decision document sets forth the basis for the determination to issue the attached Explanation of Significant Differences (ESD) for the Linemaster Switch Superfund Site in Woodstock, Connecticut.

STATUTORY BASIS FOR ISSUANCE OF ESD:

Under Section 117(c) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA), if the U.S. Environmental Protection Agency (EPA) determines that the remedial action being undertaken at a site differs significantly from the Record of Decision (ROD) for that site, EPA shall publish an Explanation of Significant Differences (ESD) between the remedial action being undertaken and the remedial action set forth in the ROD and the reasons such changes are being made. Section 300.435 (c) of the National Contingency Plan (NCP), and EPA guidance (Office of Solid Waste and Emergency Response (OSWER) Directive 9200.1-23-P, July 1999), indicate that an ESD, rather than a ROD amendment, is appropriate where the adjustments being made to the ROD are significant but do not fundamentally alter the remedy with respect to scope, performance or cost. EPA has determined that the adjustments to the ROD provided in this ESD are significant but do not fundamentally alter the overall remedy for the Linemaster site with respect to scope, performance, or cost. Therefore, this ESD is being properly issued.

In accordance with Section 117(d) of CERCLA and Section 300.825(a) of the NCP, this ESD will become part of the Administrative Record, which is available for public review at the EPA Region 1 Record Center in Boston, Massachusetts and the Town Hall in Woodstock, Connecticut.

BACKGROUND:

The July 1993 ROD addressed contamination at this site with both source control and management of migration remedial measures. The source control component included the construction and operation of a combined groundwater/vapor extraction and treatment system to remediate contaminated soil. The management of migration component included the treatment of contaminated groundwater through the operation of an air stripper and/or ultraviolet oxidation, if necessary.

OVERVIEW OF THE ESD:

Based on the information and data generated since the issuance of the July 21, 1993 ROD, as well as completion of several actions specified in the ROD, the source control component of the ROD has been modified. Specifically, the vapor extraction component of the combined groundwater/vapor extraction and treatment system will be decommissioned. The groundwater extraction component of this system and all other remaining parts of the remedy will continue to perform as specified in the 1993 ROD, as will the cleanup objectives for the site. However, the estimated time to achieve the cleanup levels for groundwater has changed from 35 years as provided in the ROD, to 48 years as provided in this ESD.

DECLARATION:

For the foregoing reasons, by my signature below, I approve the issuance of an Explanation of Significant Differences for the Linemaster Switch Superfund Site in Woodstock, Connecticut, and the changes stated therein.

Susan Studlien
Susan Studlien, Director
Office of Site Remediation and Restoration

12/13/04
Date

EXPLANATION OF SIGNIFICANT DIFFERENCES

Linemaster Switch Superfund Site Woodstock, Connecticut

I. INTRODUCTION

A. Site Name and Location

Site Name: **Linemaster Switch Superfund Site**

Site Location: **Town of Woodstock, Connecticut**

B. Lead and Support Agencies

Lead Agency: **United States Environmental Protection Agency**

Support Agency: **Connecticut Department of Environmental Protection**

C. Legal Authority

Under Section 117 (c) of the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA)¹, Section 300.435 (c) of the National Contingency Plan (NCP)², U.S. Environmental Protection Agency (EPA) guidance³, if EPA determines that differences in the remedial action significantly change, but do not fundamentally alter the remedy selected in the Record of Decision (ROD) signed on July 21, 1993, with respect to scope, performance, or cost, EPA shall publish an explanation of the significant differences (ESD) between the remedial action being undertaken and the remedial action set forth in the 1993 ROD and shall include the reasons such changes are being made.

¹ 42 U.S.C. Section 9617(c).

² 40 C.F.R. Section 300.435 (c).

³ Office of Solid Waste and Emergency Response (OSWER) Directive 9200.1-23P

D. Summary of Circumstances Necessitating this Explanation of Significant Differences

Since the 1993 ROD was issued, EPA has gathered additional information regarding the performance of the dual vapor extraction system. Based on that information, decisions were made to: modify the vapor extraction component of the remedy, and revise the estimates for the time it will take for the site to achieve the cleanup levels specified in the ROD. Details regarding modifications to the remedy and cleanup times are presented in Part IV of this ESD.

E. Availability of Documents

In accordance with Section 117 (d) of CERCLA, this Explanation of Significant Differences (ESD) will become part of the Administrative Record. The ESD, supporting documentation for the ESD, and the Administrative Record are available to the public at the following locations and may be reviewed at the times listed:

U.S. Environmental Protection Agency
Records Center
1 Congress Street
Boston, MA 02114

Weekdays from 10:00 am to 1:00 pm and from 2:00 pm to 5:00 pm
(617) 918-1440

Woodstock Town Hall
Route 169, Woodstock, CT 06281
Monday, Tuesday & Thursday 8:30 am to 4:30 pm
Wednesdays 8:30 am to 6:00 pm; Fridays 8:30 am to 3:00 pm
(860) 928-6595

II. SUMMARY OF SITE HISTORY, CONTAMINATION, AND SELECTED REMEDY

A. Site History

Linemaster Switch is an active manufacturing facility. Starting in 1952, the Linemaster Switch Corporation (Linemaster) began manufacturing foot-operated switches at the Site. As part of Linemaster's manufacturing operations, paint thinner, trichloroethylene (TCE), and other volatile organic compounds (VOCs) were used for spray painting and vapor degreasing operations. Approximately 20 to 200 gallons per year of TCE and other chemicals were discharged into an on-site drywell located in front of the east side of Linemaster's manufacturing building. The exact amount of TCE and

other chemicals discharged into the drywell is unknown, but the discharge reportedly occurred from 1969 through 1979.

In July 1980, the Connecticut Department of Environmental Protection (CTDEP) conducted a site inspection of the facility pursuant to the Resource Conservation and Recovery Act (RCRA) and, in July 1984, it conducted a Preliminary Assessment pursuant to CERCLA.

As a result of the 1980 and 1984 CTDEP investigations, EPA conducted site inspections at Linemaster in December 1985 and February 1986. During these inspections, EPA sampled the on-site production well and the back-up production well, in addition to off-site water supply wells. Results of sampling and analysis indicated the presence of VOCs in the production well, the back-up production well, and several off-site wells. VOCs, primarily TCE, were identified at concentrations exceeding state and federal drinking water standards.

On April 8, 1986, CTDEP issued an Abatement Order to Linemaster to investigate the extent of site contamination, and to take the actions necessary to minimize or eliminate any contamination. A Superfund Removal Action took place in mid-1986 to provide bottled water to affected users. In February 1987, in response to State demands, Linemaster initiated design of an interim removal treatment system (IRTS) to address groundwater contamination. This system was completed in 1992 and treats contaminated groundwater extracted from six on-site bedrock wells to drinking water standards using an air stripper and activated carbon. In September 1987, an Administrative Order by Consent (AOC) was signed between EPA and Linemaster requiring Linemaster to perform a site investigation and well monitoring, as well as to provide alternate drinking water supplies, as needed. In June 1989, Linemaster removed the drywell. The site was added to the National Priorities List (NPL) in February 1990. Thereafter, EPA and Linemaster entered into a second AOC in September 1991 under which Linemaster agreed to perform a Remedial Investigation/ Feasibility Study (RI/FS) at the Site.

The RI/FS for the site was completed in 1993. The RI/FS supported the earlier determination that the disposal of TCE and other hazardous substances into the drywell had contaminated soil and on-site groundwater to levels that were above state and federal standards. Consequently, EPA concluded that VOC concentrations in groundwater posed an unacceptable risk to human health and the environment given the present and potential future use of the groundwater as a drinking water supply. This determination led to the selection of a remedy, which was memorialized in a 1993 Record of Decision as specified below. All work related to the remedy has been and continues to be performed in accordance with a Consent Decree signed by EPA and Linemaster in 1994 and later entered in U.S. Court on January 4, 1995.

B. The Selected Remedy

The selected remedy for the Site was contained in the 1993 ROD and included both source control and management of migration (or groundwater control) components:

- In-situ vacuum extraction of contaminated soil to remove volatile organic compounds (VOCs);
- Extraction of contaminated groundwater from the overburden and bedrock using extraction wells;
- Treatment of contaminated groundwater using air stripping with carbon emission controls;
- Environmental monitoring of soil, groundwater, surface water, and private residential wells;
- Institutional controls in the form of deed restrictions to prohibit the use of the groundwater until the cleanup levels are met; and
- Five-year Reviews

III. BASIS FOR DOCUMENT

The 1993 ROD specified that all contaminated soils within Zone 1 (Figure 1) of the Site would be treated by in-situ vapor extraction. Once in-situ vapor extraction commenced, it was estimated that a period of approximately ten years of continuous operation of the system would be required for the soil to be remediated to the cleanup levels specified in the ROD. Thereafter, it was estimated that an additional 35 years would be required to restore the groundwater to beneficial reuse.

Subsequent to the issuance of the 1993 ROD, Linemaster performed a Dual Vapor Extraction (DVE) Pilot Test in December 1994 to gather data that would be used to design the DVE system. A DVE system consists of extracting soil vapors through a series of extraction wells in conjunction with a dewatering system. The vapors are extracted by a high vacuum blower, which transfers the contaminated vapors through carbon filters in order to remove the VOCs from the vapors prior to discharge to the atmosphere. The dewatering system improves the effectiveness of vapor extraction by removing groundwater from the soil targeted for vapor extraction. Contaminated water from the dewatering system is treated to drinking water standards at the IRTS.

Based on the results of DVE pilot test, Linemaster concluded that there was

insufficient data on soil characteristics to develop a Conceptual Remedial Design, and that enhancements to the natural characteristics of overburden would be required to achieve adequate air and groundwater flow for the performance of the DVE system. To address these two issues, Linemaster performed a second pilot test in November 1995 to delineate the extent of soil contamination to be addressed by DVE, and evaluate whether or not the permeability of the overburden could be enhanced through hydraulic fracturing⁴. Based on the results of this test, EPA concluded that hydraulic fracturing would enhance the permeability of the overburden and therefore, design of the DVE system could proceed. However, in recognition that the extremely low permeability of the overburden may limit the ability of this system to meet the cleanup levels specified in the ROD, EPA divided the design of the DVE into two phases (i.e., Phase 1A and 1B), with the implementation of the second phase being delayed until EPA, CTDEP, and Linemaster had the opportunity to evaluate the performance of the DVE system on soil located within the vicinity of the former drywell.

During the Fall of 1996, Linemaster installed a series of hydro-fractured wells in the former drywell area. After testing of the wells was completed, the wells were connected to the IRTS, and dewatering of the Phase 1A area began in April 1998. In December 1998, construction of the DVE system within the Phase 1A area was completed and the system became operational.

EPA, CTDEP, and Linemaster have been monitoring the performance of the DVE system since it became operational in December 1998. In February 2001, Linemaster, in consultation with EPA and CTDEP, developed and implemented a DVE Optimization Plan because monitoring of the DVE system had shown that the hydro-fractured wells had only dewatered 60% of the Phase 1A area, and the VOC removal rates of the vapor extraction component of the DVE system were steadily declining. The optimization plan included, among other things, testing of the dewatering wells, increasing the subsurface vacuum, and redevelopment of the fractured wells. These tasks were intended to improve both dewatering and VOC removal rates within soil. However, as presented in the *Final Dual Vapor Extraction System Optimization Report* (Woodard & Curran, November 2003), none of the tasks performed as part of the optimization plan significantly improved the performance of the DVE system. Based on this report, EPA concluded that the low permeability soil was preventing further dewatering and VOC removal within the Phase 1A area. Consequently, EPA determined that the vapor extraction component of the DVE system was no longer significantly contributing to the remediation of the Site and that further remediation via vapor extraction should not be pursued. This determination resulted in EPA agreeing to a moratorium on the vapor extraction component of the DVE

⁴ Hydraulic fracturing is a technique where water is injected into a groundwater well under high pressure with a goal of expanding the space of existing pores and/or fractures within the subsurface.

system in November 2003. The purpose of the moratorium was to allow EPA the opportunity to perform a formal review and evaluation of the DVE and IRTS systems to determine if the cleanup objectives presented in the 1993 ROD are still achievable. EPA has completed its evaluation and determined that the remedy selected in the 1993 ROD should be modified.

IV. DESCRIPTION OF SIGNIFICANT DIFFERENCES

EPA is revising the remedy for this site by discontinuing operation of the vapor extraction component of the DVE system while maintaining continued operation of the groundwater extraction and treatment component of the system. EPA is not changing the cleanup objectives for the site, or any of the cleanup levels provided in the 1993 ROD. This modification to the remedy is expected to result in the following significant differences:

A. Scope and Role of the Dual Vapor Extraction System

Original Remedy

The 1993 ROD addressed contamination at the Linemaster site through a combination of source control and management of migration measures. Two alternatives were selected for the source control component: Vacuum extraction and vacuum extraction with enhancements. A groundwater extraction system was also included as part of the source control component of the remedy because the soil targeted for remediation was in an area of high groundwater levels. Collectively these two components comprise the DVE system described throughout this document.

The management of migration component of the remedy included treatment of contaminated groundwater through air stripping with the flexibility to modify the treatment technology, as appropriate. Because there are no changes to this component of the remedy as implemented through the IRTS, it is not discussed in detail in the ESD. Groundwater at the site will continue to be extracted through a series of pumping wells then treated via air stripping with carbon polishing prior to being discharged to the on-site pond.

Modified Remedy

As stated previously, this modified remedy will not rely on vapor extraction for further remediation of soil. Rather, the soil cleanup levels presented in the ROD will be achieved through the flushing of contaminants via the continued operation of the groundwater extraction component of the DVE system. The vapor extraction component of the DVE system will be permanently decommissioned, and the operation and maintenance plan for the site will be revised accordingly. The scope of the environmental monitoring will be adjusted to be consistent with the modified remedy. However, EPA will

continue to track the progress of remediating the soil to the cleanup levels specified in the 1993 ROD. All remaining components of the remedy (i.e., management of migration, long-term monitoring) will remain unchanged.

B. Expected Outcomes

Original Remedy

Based on information available at the time of the ROD, EPA estimated that the DVE system would achieve the soil cleanup levels within a ten-year time frame after construction of the system. Thereafter, it would take an additional 35 years to remediate the groundwater at the site. However, it was acknowledged that the actual efficiency of the DVE system and the timeframe to achieve the estimated cleanup levels could not be evaluated until after the system was constructed. For this reason, the ROD stated that the ability of the DVE system to achieve the cleanup levels within the estimated timeframe could not be determined until the extraction system was operated and modified as necessary, and the plume response monitored over time.

Modified remedy

The modified remedy is expected to have the same outcome as the original remedy presented in the 1993 ROD. Although the vapor extraction component of the DVE system will no longer be in operation, the cleanup objectives for soil and groundwater remain unchanged. That is, EPA expects the remedy to achieve all of the cleanup levels presented in the ROD.

EPA estimates that the minimum length of time for the modified remedy to achieve the cleanup goals throughout the site will be 48 years from the start of remediation. Although this time is similar to the total length of time presented in the 1993 ROD as described above, it is possible that it may take longer should the current mass removal rates from the groundwater extraction systems significantly decrease, or there is more contamination in the subsurface than originally estimated. However, EPA does not foresee any of these factors changing the expectation that the groundwater will be remediated within a reasonable period of time. Details regarding the approach and assumptions used to develop revised cleanup times are presented in a technical memo that is included as Attachment A.

Although the modified remedy is expected to achieve the same outcome as the original remedy, it is anticipated that terminating the vapor extraction component of the DVE system will result in considerable costs savings. Based on information presented by Linemaster, it is anticipated that the modified remedy will result in an annual cost savings of approximately \$60,000 per year.

V. SUPPORT AGENCY COMMENTS

CTDEP has participated with EPA in developing the modifications to the selected remedy described herein and concurs with the modifications adopted by EPA (see letter of concurrence provided in Attachment B).

VI. STATUTORY DETERMINATIONS

EPA believes that the remedy as adjusted herein remains protective of human health and the environment and satisfies the requirements in Section 121 of CERCLA. Discontinuation of the vapor extraction component has not changed the remedial action objectives for the Site, nor has it significantly changed the time estimated to meet those objectives. Rather, the modifications to the remedy described herein will allow the remedy to continue to perform in the most cost-effective manner as possible by recognizing that vapor extraction component of the DVE system is no longer contributing significantly to the remediation of contaminated soil.

VII. PUBLIC PARTICIPATION COMPLIANCE

In accordance with Section 117(d) with CERCLA and Section 300.825(a) of the NCP, this ESD will become part of the Site's Administrative Record which is available for public review at both the EPA Region 1 Record Center at One Congress Street, Boston, Massachusetts 02114 (617-918-1440), and the Woodstock Town Hall, Route 169, Woodstock, CT 06281 (860-928-6595). Additionally, a notice that briefly summarizes the changes and the reasons for making such changes described in the ESD will be published in a major local newspaper of general circulation following the signing of this ESD.

Attachment A

Technical Memorandum

Date: June 10, 2004

To: File

From: Bill Lovely

Re: Linemaster Switch Superfund Site
Woodstock, CT

Subject: Re-Evaluation of Cleanup Times Based on Decommissioning of the Vapor
Extraction System

Introduction

In the 1993 Record of Decision (ROD), it was estimated that it would take a total of 10 years for the dual-vapor extraction system (DVE) to remediate contaminated soil at the Linemaster Switch Superfund Site (the Site). Based on data available at the time of the ROD, it was estimated to take 35 years after implementation of the groundwater component of the remedy to remediate the groundwater to beneficial reuse. However, as presented in the *DVE Optimization Report* (Woodard & Curran, November 2003) it is unlikely that the site will be remediated by the DVE system within the timeframe specified in the 1993 ROD. The primary reason for the inability of the DVE system to perform as anticipated is the low permeability of the soils: these site conditions are preventing full dewatering of the area targeted for vapor extraction, and for those areas which have been dewatered, the mass removal rates have been minimal, averaging 1.6 lbs. VOCs per month.

In recognition of the extremely low mass removal rates currently being achieved by the vapor extraction component of the DVE system, EPA approved a temporary moratorium on the vapor extraction system on November 26, 2003. EPA expects to make a final determination on the status of the vapor extraction component of the remedy at a later date. However, before such a determination can be made, EPA must first consider whether or not a permanent decommissioning of the system constitutes a fundamental change to the remedy. Because EPA does not anticipate changing the cleanup objectives for this Site, the determination of whether or not a permanent decommissioning of the system constitutes a fundamental change will be based on the impact that the decommissioning of the system will have on the time to achieve the cleanup objectives presented in the 1993 ROD. Therefore, the objective of this evaluation is to determine whether, by shutting down the vapor extraction component of the DVE System at the Linemaster Switch Superfund Site, the estimated cleanup time will increase so greatly to trigger the need for a ROD amendment.

Comparison of Cleanup Times

As mentioned previously, the 1993 ROD estimated that it would take a total of 35 years for the site to achieve the cleanup levels. EPA re-evaluated the time it would take for the site to achieve cleanup levels by dividing the estimated mass of DNAPL assumed to be in the aquifer by the current mass removal rate as shown in the following expression:

$$\begin{aligned}\text{Cleanup Time} &= \text{Assumed maximum mass of DNAPL} / \text{Current mass removal rate} \\ &\quad * 1 \text{ year} / 12 \text{ months} \\ &= 5651 \text{ lbs.} / 9.8 \text{ lbs. per month} * 1 \text{ year} / 12 \text{ months} \\ &= \text{Approximately 48 years}\end{aligned}$$

Assumptions

These calculations are based on the following assumptions:

- 1.) Assumed maximum mass of DNAPL, as estimated using PRP anecdotal evidence and PRP data, is accurate
- 2.) Mass removal rate via groundwater pumped from the IRTS, GW-08DB, (facility supply well), and from select DVE wells, is accurate, remains constant, and does not trail off

Conclusion

Based on the current performance of the groundwater extraction and treatment systems, and the assumptions presented above, it appears that significant progress towards achieving site cleanup in a reasonable time frame can be made without the vapor extraction component of the DVE system in operation. The incremental loss of contaminant removal achieved by the vapor extraction system does not significantly impact the remedial timeframe, assuming that the IRTS and select groundwater extraction wells from the DVE system, along with the facility supply well, continue to extract groundwater and contamination at the current rate of removal.

Uncertainties

For numerous reasons, groundwater cleanup times cannot be accurately estimated at sites where DNAPL is present. The uncertainties that prevent the prediction of reliable cleanup times are generally related to the two assumptions that were presented above in the cleanup time calculation; i.e., the assumed mass of DNAPL present in the subsurface, and the projected rate of mass removal.

Mass of DNAPL Present. At most sites, the estimation of the amount of waste that was released to the environment is, by necessity, based on secondary evidence. At Linemaster, the estimate of the amount of DNAPL that was released to the dry well was

based on records of chemical usage at the facility, probably with some allowance for losses during use. The estimate was presented as a range. The estimated maximum amount of DNAPL was then used in the cleanup time calculation, in an attempt to calculate a reasonable "worst case" scenario. Nonetheless, the actual amount of DNAPL in the subsurface is uncertain and may exceed the estimated maximum. This inherent uncertainty regarding the amount of DNAPL almost always places constraints on the prediction of a cleanup time for groundwater.

Rate of Mass Removal. In the estimation of cleanup time in this memorandum, the assumption was made that the rate of contaminant removal would remain constant. For a variety of reasons, this assumption may be optimistic. Experience has shown that at sites with DNAPL, the removal rate declines with time. As the DNAPL mass is slowly diminished by passing groundwater, it has less contact with passing groundwater. As a result, amount of dissolution is likely to decrease, and the rate at which the DNAPL is removed as a dissolved phase contaminant is reduced.

Heterogeneities in the subsurface also slow the rate of mass removal. DNAPL typically migrates into the most permeable parts of the subsurface. In these permeable zones, dissolution of the DNAPL will be relatively rapid, as long as the quantity of DNAPL is not so great that the permeability of the zone to groundwater flow has not been significantly diminished. As the DNAPL is removed from these permeable zones, their capacity to transmit groundwater increases. As more groundwater flows through these cleaner zones, less will flow through less permeable zones, with the result that the DNAPL in those zones experiences less groundwater circulation. The overall rate of mass removal thus declines, since DNAPL is dissolved at a slower rate.

Matrix diffusion, a process by which the DNAPL in the dissolved phase moves from the permeable zones or fractures into the adjacent porous medium, is another factor that affects groundwater cleanup times. Since the net effect of matrix diffusion is to slow the release of the contaminants to the passing groundwater, the occurrence of this process also tends to extend the cleanup time.

Attachment B



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



November 22, 2004

Susan Studien, Director
U.S. Environmental Protection Agency
Office of Site Remediation and Restoration
1 Congress St.
Suite 1100 (HIO)
Boston, MA 02114-2023

Subject: Linemaster Switch
Draft Explanation of Significant Differences

Dear Ms. Studien:

The Connecticut Department of Environmental Protection has reviewed EPA's draft "Declaration for the Explanation of Significant Differences (ESD)" document dated June 2004. EPA submitted this document to Mr. Mark Lewis of my staff on June 10, 2004 by e-mail. This document modifies the remedy specified in the July 1993 Record of Decision.

EPA proposes to permanently discontinue operation of the vapor extraction portion of the dual-phase vapor extraction (DVE) system. The groundwater extraction component of this system and all remaining parts of the remedy will continue to operate as specified in the 1993 Record of Decision, and the cleanup objectives for the site remain unchanged. EPA has also put in place deed restrictions on the Linemaster property and several adjacent properties to prevent the use of ground water until cleanup levels are achieved.

The State concurs with EPA's decision to modify the remedy, as documented in the draft ESD. This concurrence is based upon EPA's commitment to continue monitoring of soil and ground water to ensure that cleanup objectives can still be met in a reasonable time-frame. The State will closely examine the effectiveness of the remedy as part of the next Five-Year Review, which is scheduled for 2009.

If you have any questions concerning this matter, please contact Mr. Lewis at (860) 424-3768.

Sincerely,

Elsie Patton, Acting Director
Planning and Standards Division
Bureau of Waste Management

EP:MRL

cc: Mr. William Lovely
U.S. Environmental Protection Agency
Office of Site Remediation and Restoration
1 Congress St.
Suite 1100 (HIO)
Boston, MA 02114-2023

Mark Lewis, CTDEP