

United States Environmental Protection Agency

New England, Region I

5 Post Office Square, Suite 100, Mailbox OSSR07-4
Boston, MA 02109-3912



July 11, 2014

Mr. David Fiereck, P.E., L.E.P.
Vice President
Loureiro Engineering Associates, Inc.
An Employee Owned Company
100 Northwest Drive
Plainville, CT 06062

Re: EPA Approval of the Vapor Intrusion Groundwater Investigation Plan, Old Southington Landfill Superfund Site, Southington CT

Dear Mr. Fiereck:

This letter is to inform you that the U.S. Environmental Protection Agency (EPA), in consultation with the CT Department of Energy and Environmental Protection (CT DEEP), has reviewed the report titled, Vapor Intrusion Groundwater Investigation Report (Report), Old Southington Landfill, Southington, CT, dated July 2012, prepared by Loureiro Engineering Associates, Inc. on behalf of the Performing Settling Defendants (PSDs). In addition, EPA has also reviewed a letter submitted by CT DEEP, dated July 16, 2013 where CT DEEP recommends approval of this report. Attached to this letter are EPA comments to be addressed (see Attachment A.)

EPA is in agreement with CT DEEP that the PSDs have met the requirements of the Report including vapor intrusion monitoring requirements and unless there is some unforeseeable release of contamination from the Old Southington Landfill Superfund Site, the Report and monitoring requirements are hereby approved in accordance with Consent Decree, Civil No. 3:09-cv-1515 (SRU), entered on November 24, 2009, Section XI, paragraph 36(b). This does not affect the PSD's requirement to continue the cap effectiveness groundwater monitoring as required in the 1994 ROD.

However, please note that in the Report, the PSDs request the use of the draft 2003 Volatilization Criteria as alternate criteria. EPA cannot grant this request because the PSDs are required to use the criteria set in the 2006 ROD.

If you have any questions, please do not hesitate to contact me at (617) 918-1246 or via email at silva.almerinda@epa.gov. Thank you for your continued cooperation.

Sincerely,



Almerinda P. Silva
Remedial Project Manager

cc: Michael Jasinski, EPA
Ruthann Sherman, EPA
Stephen Gaura, CT DEEP
Christine Lacas, CT DEEP
Liyang Chu, Nobis
Boyd Allen, Nobis

Attachment A

EPA Comments on the Vapor Intrusion Groundwater Report Old Southington Landfill, Southington, CT July 2014

1) Tables 3-1 and 3-2, and well completion logs:

The sample intervals for the CB-MW series of monitoring wells listed in Tables 3-1 and 3-2 are different from those depicted in the well completion reports. For example, on Table 3-1 and 3-2, the CB-MW-01 sample interval is listed as 3.00 – 13.00 feet. In the well completion report, the screened interval is depicted as 5 – 15 feet below ground (bg). While this is not a critical issue for the VI sampling, it could be of importance should water level measurements from these wells be used to develop potentiometric surface maps, which could affect interpretations. Please make correction to the report.

2) Table 3-1:

Do the symbols “X”, “x”, and “f” mean “VOCs detected,” “analyzed for VOCs,” and “filtered samples also collected”, respectively? There were no footnotes for the table. If so, information presented in Table 3-1 do not match those presented in Tables 3-2 or 3-3. For example, both filtered and unfiltered CB-MW-01 samples were collected on 6/15/2011, 9/13/2011, and 12/12/2011, based on Table 3-3. However, Table 3-1 only shows “f” for the 12/12/2011 event. As a suggestion for future reports, eliminate rows for filtered results from the tables for summaries of positive detects. Rather, include “filtered” or “unfiltered” identifiers in the header rows. This way, it will be much easier to compare filtered and unfiltered results for a well from each sampling event with the results displayed side by side. The current table requires constant checking of which rows are labeled “filtered” or “unfiltered.”

3) Page 3-1, Section 3.1.1:

This section indicates that “Although acetone was also detected in the sample from CB-MW-02 in the September 2011 event that result is qualified as acetone was also detected in a laboratory blank.” This statement appears to be incorrect. All method blank results presented in the five groundwater reports found in Appendix C were reviewed. Only one method blank (MB 220-54809/3) had a reported detection. That detection was for methylene chloride at 2.21 ug/L. The only sample associated with this blank that had a detection of methylene chloride was sample 1239909 (220-16485-4), which turned out to be a trip blank. The method blank associated with sample CB-MW-02 sampled in September 2011 was MB 220-52021/3 reported in laboratory report 220-15753. The result for acetone for that sample was ND at 2 ug/L. The significance of this assessment is that acetone is likely present in the sample, and not associated with potential laboratory contamination. However, the result does not substantially change the PSDs’ interpretations in Section 4.0.

4) Page 3-2, Section 3.1.2:

The PSDs state that the MBTE and aromatic hydrocarbons (benzene, toluene, and o-xylene) are attributable to the Chuck and Eddie’s property. This interpretation is reasonable as these are all gasoline constituents and are likely unrelated to the VOCs plume originating from the landfill.

5) Page 4-1 Section 4.1:

The PSDs indicate that vinyl chloride exceeded the ground water Volatilization Criteria in two monitoring wells located on the Chuck & Eddie's property. There were no exceedances of Volatilization Criteria in samples obtained from the Radio Station property. The PSDs indicate that, per the Record of Decision, application of ELURs to both properties will address the potential exposure to groundwater contamination through vapor intrusion.

6) Page 4-3, Sec. 4.3:

The PSDs request the use of the draft 2003 Volatilization Criteria as alternate criteria. The PSDs are required to use the criteria set in the 2006 ROD. Thus, EPA does not grant this request.

7) Appendix C:

A typographical error (repeated multiple instances) is noted in the laboratory reports: "vial," not "vile".