

STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



August 5, 2005

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238230

Mary Jane O'Donnell
EPA New England
1 Congress Street, Suite 1100 (HBT)
Boston MA 02114-2023



SDMS DocID 238230

Subject: Comments on Proposed Plan, Solvents Recovery Service of New England, Inc., (SRS) Superfund Site, Southington, CT

Dear Ms. O'Donnell,

The Connecticut Department of Environmental Protection has reviewed the May 2005 Proposed Plan for the SRS Superfund Site, and offers the following general and specific comments:

In general, the CT DEP supports EPA's proposed remedy for the SRSNE site in Southington, CT. As described in the Proposed Plan (dated May, 2005) that was prepared and issued by EPA in June, EPA is proposing a combination of remedial alternatives including:

- In-situ thermal treatment of the overburden aquifer (Alternative ONOGU-5)
- Excavation, consolidation and capping of contaminated soils and wetland soils on-site (Alternatives OAR-2 and CP-2) and
- Pumping, treating, and monitoring groundwater, and restricting use of contaminated groundwater combined with monitored natural attenuation (Alternatives OGW-3, BGW-3 and NBGU-2)

The remedy proposed by EPA also includes supplemental groundwater containment contingency that would be implemented if the Town of Southington decides to reactivate production wells #4 and/or #6 in the future.

DEP believes that the proposed alternative for the removal of NAPL (Alternative OGONU-5) will result in the greatest removal of non-aqueous phase liquids (NAPL) from the groundwater in the shortest timeframe, and that this alternative, in combination with the other alternatives will be protective of human health and the environment.

However, DEP requests that EPA revise the Preliminary Remediation Goals for soil and that EPA ensure that polluted soil that is not consolidated and capped, as described in Alternatives OAR-2 and CP-2, complies with Section 22a-133k-2(a) of the Regulations of Connecticut State Agencies. Specifically, the PRG for 2,3,7,8-TCDD-TEQ identified on Table 5-2b should be the background concentration found in similar soil that has not been affected by the releases at the SRS Superfund site or any other release.

Connecticut's Remediation Standard Regulations (the RSRs) have been identified as "Applicable" ARARs, and as such any remedy selected for this NPL site must comply with the RSRs, unless a waiver (pursuant to CERCLA) is invoked. Section 22a-133k-2(a) of the Remediation Standard Regulations states that polluted soil at a release area shall be remediated to a concentration which meets direct exposure and

pollutant mobility criteria or the background concentration. Section 22a-133k-1(a)(6) defines background as follows:

(6) "Background concentration for soil" means the representative concentration of a substance in soil of similar texture and composition outside the subject release area and in the general geographic vicinity of such release area, but not within any other release area.

With respect to 2,3,7,8-TCDD-TEQ, neither Appendix A or B of the RSRs specify a direct exposure criteria. Consequently, to comply with the RSRs the PRG for 2,3,7,8-TCDD-TEQ must be no greater than the representative concentration of such compounds in soil in the vicinity of the SRS superfund site, which soil has not been affected by a release.

We want to thank you for giving us the opportunity to comment on the proposed plan. We look forward to the implementation of this plan and the restoration of an important drinking water resource in our State. If you have any further questions please contact me at 860 424-3762.

Sincerely,



Elsie Patton
Director of Planning and Standards
Bureau of Waste Management

**Use This Space to Write Your Comments
or to be added to the mailing list**

EPA encourages you to provide your written comments and ideas about the cleanup options under consideration for addressing the contamination at the Solvents Recovery Service of New England, Inc. Superfund Site. You can use the form below to send written comments, or submit them via the internet. If you have questions about how to comment, please call **Jim Murphy of EPA's Community Affairs Office at 617-918-1028 or toll free at 1-888-372-7341, extension 81028.** Submit written comments, which must be postmarked (in the case of U.S. Mail) or received (in the case of E-mail) no later than **July 8, 2005**, to:

**Karen Lumino
Remedial Project Manager
EPA New England
1 Congress Street
Suite 1100 (HBT)
Boston, MA 02114 - 2023
E-mail: lumino.karen@epa.gov**

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SDMS DocID 238231

THE CLEAN UP PLAN CALLS FOR IMPLEMENTING RESTRICTIONS ON USES OF THE SITE
AND GROUNDWATER. THEREFORE I RECCOMEND CONTINUE THE CURRENT METHOD UNTIL
MORE IS LEARNED 50 YEARS FROM NOW, OR DEWATER THE AREA AS MUCH AS POSSIBLE
REMOVE THE SOIL OR (SOUP BY PUMPING IT) SEAL THE BEDROCK AND CLOSE IT.
TO MAKE THE GOAL MORE ATTAINABLE RECLASSIFY THE GROUNDWATER, IF YOU
NEED A PRIVATE PARTY TO INITIATE IT, I CAN RECCOMEND SOMEONE AND I
WILL FOLLOW IT AT THE LOCAL LEVEL. THE FACT THAT THE PROCESS IS IN MOTION
DES NOT MEAN IT CAN'T BE SLOWED OR CHANGED.

THANK YOU!

(Attach sheets as needed)

Comment Submitted by:



Mr. Severino V. Bovino
285 Hightower Rd.
Southington, CT 06489-2417

Mailing list additions, deletions or changes

- If you did not receive this through the mail and would like to
- be added to the site mailing list
 - note, a change of address
 - be deleted from the mailing list

Name : **Mr. Severino V. Bovino**
Address: **285 Hightower Rd.**
The Jimmy Fund. Southington, CT 06489-2417

Please check the appropriate box and fill in the correct address information above. Send to Karen Lumino at above postal or e-mail address.

16179181291

August 8, 2005
10 Praeli Court
Southington, CT
06489

SRS
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Ms. Karen Lumero
United States EPA
1 Congress St.
Boston, Mass. 02114-2010



SDMS DocID

238232

Dear Karen,

After all these years, after all we've been through (12 cancer cases in the first 15 houses on Lazy Lane) and now a 30 year old young man with kidney cancer who grew up & lived on Lazy Lane died last week - all the cases past, present, & hopefully not future leads us to make only one request before millions of dollars are spent - please do a complete pilot study, trial run, whatever - because the residents deserve the consideration I have faith in the EPA & the PRP's. It's not 1955 anymore. Let's get on with it!

Thanks,

Mame Trucchi

Irene Ahern Najarian
65 Maxwell Drive
Plantsville, Ct. ~~06051~~ 06479
(860) 628-0624

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238233

July 7, 2005

EPA New England
Attn: Karen Lumino
Remedial Project Manager
RE: Solvents Recovery Southington, CT
1 Congress Street
Suite 1100 (HBT)
Boston, MA
02114-2023



SDMS DocID 238233

For the first 25 years of my life, I lived on Kane Street (1965-1990). You know, "Those formative years?" It was there that we, my family and neighbors, played and grew in what was a typical low income, hard working, "wrong side of the tracks", zone. At school we were "walkers", and as we walked, we'd passed by The Beaton and Corbin Mfg. Co. and we'd give a wave to the ladies visibility working hard through the factory's bottom windows. On warm days the windows would be open and we could chat with the ladies about school and things that didn't really matter. If I ever did know those ladies names, I don't remember them now, but my sister, Jackie, tells me, "One lady was named Frankie." Knowing my sister, I bet she's right too. Most of all, I just remember they were nice ladies and when they said, "Hey Red! How was your day?" I didn't mind.

Back then, we often walked to school in small groups. On our trip to school we'd also pass Fire Co. #1 and wave to the firemen and they would always wave back. I remember it was my sister, Sally, who showed me if you ducked down just right you, could see the clock on the back of the firehouse wall and then you'd know just how much more time you had to "goof off" before the day at North Center Elementary School began. I grew up feeling safer and luckier than other families because we had the fire station for our neighbors.

I remember watching and waving to my neighbors Rita and her Dad, Andy, as they walked to work each day at the Beaton & Corbin, a nickel and chrome plating factory. And in the summer I would see them walk back home for lunch and then back to work yet again. No doubt about it, The B&C put food on many a table in my neck of the woods. It was a real living and breathing institution.

On the way home from school, the routine was a just a little different. We would wave to the firemen who by this time would often be sitting outside on folding chairs watching the passing traffic. Then we'd stop and have a pretend picnic or tea party under the big Maple tree that today still grows right there between the Fire Dept. and the Beaton and Corbin property. Sometimes the B&C workers would be outside at their table under an apple tree laughing and chatting and taking a brake from the sweltering heat. I always wondered if

they could eat those apples? But back then, I just knew that there was a fence and that kept me from eating them.

While the view and play on Main St was nice, it was in the back of the B&C building that held a real adventure, it was our unofficial neighborhood playground. There we could toss bits and pieces & odds and ends into the green sludge pond that the factory spewed out more often than not. We'd enthusiastically watch those objects to see if they would sizzle, dissolve and melt like the big kids said they would. I don't really think they ever did. But, even as kids in the late 60's -70's, we knew something was not right with the green lagoon. Its color didn't look good or smell good and instinctively we just knew it wouldn't taste good either. We just called it plain old "acid" back then. I'm sure today someone could give you a complete chemical breakdown on that lagoon (if only they'd want to). Like a choreographed "Right of Passage Dance" the big kids took the little ones to look at the acid pit and every time someone would pretend to push someone else in. Eventually at an early age we all learned to stay back a bit and not get too close. You know, leave a little room for error? Some 25+ years ago, long after she'd weaned her 5 children on well water, troubled with the knowledge and fear that the pollution had leached downward into the wells and ground water my Mom started getting bottled water (you'll have to believe me that was long before bottled water was hip and trendy). Behind the factory we could also investigate the Quinnepiac River and walk the rails of the RR tracks, some kids could even ride their bikes on the rails- I'm still impressed by that today. Often we'd wait for the train (a minimum of 2 passbys daily) to squish bottle caps and such. "And Yes! The engineers would always wave too. Man! That train could rumble the pictures off the walls" & I will never forget the sound of our Fire Station emergency horn "BLAAAAAM!" every evening at 6:00 on the dot. "Wow! Was that loud!" Yet still, I don't remember anyone on Kane St. ever complaining. Those sounds and the sound of the B&C they were all comforting sounds- like "the heart beat of our neighborhood." Everything was operating as should be and as expected. Or so we thought.

Years later when my niece and nephew walked to North Center School, I showed them all the tricks the big kids had taught me. The walk to school along North Main Street still held its magic they knew it and I knew it. This was the early 90's and while the factory had gone "belly up" and closed down, yet enough still seemed the same. Now mixed in among the old trees were new trees- new trees that blossomed pink, much fancier than the old ones. I know it sounds silly but I was happy for the factory. Happy that it had gotten fancy, pretty trees before it closed down. They were a symbol- a sign of hope. Hope that maybe someone would buy it and turn its imperfect legacy around. When the Beaton and Corbin sold for the last time, many hands began to scramble to get hold of the 3+ acres at the beginning of North Main St. "THE GATEWAY TO SOUTHWIGTON" only to find out that the potato they were lusting after was much "hotter" than they had anticipated and so the "hot potato toss" began. Oddly enough no one seems have gotten caught holding it, yet.

In 2003 the new Rails to Trails Liner Park went through our little back street. Now while, I do miss the familiar RR tracks, I enjoy having something nice in the neighborhood and I was

happy for the people of Kane Street -many still original families. Maybe, the trail would help liberate us from our toxic past image or maybe it just left us vulnerable to mischief, lust and/or greed. I'm still not sure yet.

At the beginning of Sept. 2003, just as school was going into session my sister, Josie, mentioned to me that someone had dug up the pretty pink trees in the front of the B&C building. Now, who would do this? You know, just sneak in and strip away what ever it was they coveted? And why now? I guess they thought no one would notice. Perhaps our lack of complaining was interpreted as not caring or not seeing. But then oddly just 2 weeks later, on September 22, 2003 our neighborhood lost the B&C institution for the 2nd time. Later I'd realize that for me personally even more Community and Gov. institutions would go up in smoke that night shaking and taking my trust and faith in the institutions of my home town, and stripping away the human dignity and human rights of the people that lived next to this derelict pit of poison, my friends, family and former neighbors. You see, at least one neighboring resident called 911 to report smoke and flames and were they were told not to worry/ ignore it, it was just a drill. When the fire dept. did arrive residents were ordered to leave immediately and many did, promptly (for approx 24hrs)! Children left in PJs with no clothes for school the next day. Residents without money drove around in their cars hoping to get information on their radios (it never came). Some residents too sick to leave w/o assistance hid in their homes. Some too afraid of the feared toxic smoke hid in their homes as well, elderly left without their much needed medications. People left without their pets. One evacuated citizen asked first responders where he should go? And he was told, "Go get a cup of coffee at Dunkin Donuts!" they did not care, "Just get in your car and go!" Much needed information such as how far to go was far enough? And how long would they be away? This information never came (not ever). Instead of a calm and informative orderly evacuation these citizens were literally and figuratively in the dark (power was cut to all surrounding areas). This a "limited incident" sadly took on the persona of a full fledged panic.

Now the first resident to report the fire is important for several reasons. Not just because he was mishandled and inaccurately misinformed while making a 911 call and reporting what later was labeled as a suspicious 3-alarm blaze and the largest fire Southington has ever seen but because on September 22, 2003 The Southington Fire Co. #1 did have a drill. A car drill and a car was foolishly set on fire a few feet from this abandon and derelict property and a few feet from a Duke Energy above ground gas transfer station making its "No Smoking" sign quite silly and very scary while the B&C was allowed blaze on in what could be called a "controlled burn". Water was not used to control the blaze.

When I was a child the times were freer and we explored our neighborhood unhampered from adults. We explored it from top to bottom on a daily basis. Yes, Solvents Recovery was all

part of the fun as well. When I was a child, I was privileged enough to be able to think like a child. I thought institutions represented and defined the people inside them. As for today, I am older now and I know, "That institutions are not people. People are the institutions: people lend their credibility to the institutions in which they work" Am I naive to expect professionalism, honesty and accountability from individuals? Perhaps? Perhaps many institutions are little more than cardboard props in some cheesy made for TV movie?

It's funny but in all the years of living/loving/playing next to the B&C, I never actually saw the inside of it. Now/today its insides lay spilled out on the earth. And all that remains of our former Superfund Site is a Brownfield, its skeletal "remains" and its toxic soil.

Now approx just ¼ mile as the "crow flies" from the B&C and my family "nesting ground" lays the Solvents Recovery Super Fund Site. Recently, it appeared in our local paper that all questions regarding the proposed cleanup of this site should be address to your office. Our local library held a Q and A session and No I did not attend. The memory of our current town manager sleeping during the B&C superfund meeting 20+ years earlier got the best of me. Anyway, here is my question: currently this land is thankfully slated for a 29 million dollar "clean up" beginning in 2005 ending in 2205. My question is how much % wise would good old Mother Nature clean up from this soil in 200 years? How much would be cleaned up naturally in 200 years?

In my heart, I know I am not alone, I know that the railroad tracks join thousands and thousands of US citizens in similar situations all across the US. Perhaps they don't know the devil that looms large in their future. In many cases it is cost prohibitive to be proactive in this clean up area. If that is the case, then please spend \$\$\$\$ and prepare jurisdictions in appropriate evacuations and mandate all local fire depts. to proactively alert Gas Transmission Line Companies to the possible hazardous situations as they are happening. In our case, the only calls made to Duke Energy were from neighbors that remembered when the gas line went though 20 years earlier and who seriously believed Duke Energy when Duke asked for their help in monitoring the neighborhood lines. My Mom still has her 20 year old complimentary key chain gift from Duke that says, "Remember we're all in this together!" I'd like a response but have learned not to really expect one. I'd really like to know what the Chromium levels were on the night of the B&C fire? All official documentation I've received leaves that information blank. If in the next 200 years the Solvents Recovery site mysteriously goes up in flames (as bothersome, dilapidated properties so often do here) that will make sure that the human beings and families are cared for? Do I care? You'd better believe it! Do I want clean up today? Yes. And if not today I guess 200 years from now will have to be okay too.

Thanks for letting me tell my story.

Irene Ahern Najarian



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or to be added to the mailing list**

EPA encourages you to provide your written comments and ideas about the cleanup options under consideration for addressing the contamination at the Solvents Recovery Service of New England, Inc. Superfund Site. You can use the form below to send written comments, or submit them via the internet. If you have questions about how to comment, please call **Jim Murphy of EPA's Community Affairs Office at 617-918-1028 or toll free at 1-888-372-7341, extension 81028.** Submit written comments, which must be postmarked (in the case of U.S. Mail) or received (in the case of E-mail) no later than **July 8, 2005**, to:

Karen Lumino
Remedial Project Manager
EPA New England
1 Congress Street
Suite 1100 (HBT)
Boston, MA 02114 - 2023
E-mail: lumino.karen@epa.gov

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SDMS DocID 238234

When are we going to have the next De Minimus settlement

with regard to the SRS New England Superfund Site?

The company I represent, Mann Industries, Inc. was

a small quantity generator of 11,655 Gallons.

(Attach sheets as needed)

Comment Submitted by:

Victor Zager

VICTOR ZAGER, Attorney-at-Law
For Mann Industries, Inc.
917 Anderson Street

Bristol, TN 37620

Mailing list additions, deletions or changes

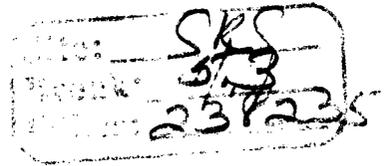
If you did not receive this through the mail and would like to

- be added to the site mailing list
- note a change of address
- be deleted from the mailing list

Name : _____
Address: _____

Please check the appropriate box and fill in the correct address information above. Send to Karen Lumino at above postal or e-mail address.

EPA - New England
Atn: Karen Lumino
One Congress Street
Suite 1100
Boston, MA
02114-2023



July 11, 2005



Ms. Lumino,

SDMS DocID 238235

It has been brought to my attention that the Environmental Protection Agency is looking into a possible clean-up of the Southington, CT former "Solvents Recovery" site. It is my understanding that while cleanup may begin in the coming months it is not expected to be complete for many decades. I am enquiring about the cleanup process itself. Has this method of gasifying the hazardous chemicals been used elsewhere in the USA? And if so where and how often? Have the professionals voiced any pros or cons to this specific process? Have residents in similar situations (perhaps further along in the process voiced valid concerns)? I have been told that an attendant will work a 40 hour week maintaining the site and its equipment. What are the job requirements for said person/position? What type of training and or educational background will this employee have? Are there plans for any of the buildings currently on this site to be removed or demolished to prevent possible vandalism and diminish the chance for a major fire?

It is of course, my hope that this site and the two area wells be fully restored to vitality as soon as possible with little or no risk to the public. I look forward to future cleanup- while if not in my or my children's lifetime then perhaps in the lifetime of my grandchildren or their children.

Please add my name to the mailing list- Thank you!

Respectfully yours,

Kelly Brayfield
36 Kane Street
Southington, CT 06489

**Use This Space to Write Your Comments
or to be added to the mailing list**

EPA encourages you to provide your written comments and ideas about the cleanup options under consideration for addressing the contamination at the Solvents Recovery Service of New England, Inc. Superfund Site. You can use the form below to send written comments, or submit them via the internet. If you have questions about how to comment, please call **Jim Murphy of EPA's Community Affairs Office at 617-918-1028 or toll free at 1-888-372-7341, extension 81028.** Submit written comments, which must be postmarked (in the case of U.S. Mail) or received (in the case of E-mail) no later than **July 8, 2005**, to:

**Karen Lumino
Remedial Project Manager
EPA New England
1 Congress Street
Suite 1100 (HBT)
Boston, MA 02114 - 2023
E-mail: lumino.karen@epa.gov**

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SDMS DocID 238236

1) When ^{will} the rails to trails be completed in this area as promised?

2) A How often will testing ~~inspections~~ be performed on:

a) volatiles

b) equipment

2B) How will these results be accessible to the public?

3) What are the reporting requirements to the EPA + other government agencies on errors + hazards / mishaps / reportables at the facility.
(Attach sheets as needed)

Comment Submitted by: Michelle Allaire
228 Lazy Lane
Southington, CT 06489 860 630 0667

Mailing list additions, deletions or changes

If you did not receive this through the mail and would like to

be added to the site mailing list

note a change of address

be deleted from the mailing list

Name: Michelle Allaire

Address: 228 Lazy Lane
Southington CT 06489

Please check the appropriate box and fill in the correct address information above. Send to Karen Lumino at above postal or e-mail address.



**United States
Environmental Protection
Agency New England**

**One Congress Street Suite 1100 (HBT)
Boston, Massachusetts 02114-2023**

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Proposed Cleanup Plan for Solvents Recovery Service of New England, Inc. Superfund Site

Information Meeting:	Wednesday, June 8, 2005	6:30 p.m.	Southington Public Library	255 Main Street
Public Hearing:	Thursday, June 30, 2005	6:30 p.m.	Southington Town Hall	75 Main Street

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238237

Robert C. Kirsch

60 STATE STREET
BOSTON, MA 02109
+1 617 526 6779
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robert.kirsch@wilmerhale.com

June 24, 2005

Electronic and First Class Mail

Ms. Karen M. Lumino
U.S. EPA, New England Region
One Congress St.
Suite 1100 HBT
Boston, MA 02114-2023

Re: SRSNE
Proposed Plan
Public Comment Period



SDMS DocID 238237

Dear Karen:

Pursuant to the Proposed Plan released in May and the National Contingency Plan, the SRSNE PRP Group respectfully requests that EPA extend the public comment period relating to the above referenced Proposed Plan for an additional 30 days. Please call me if you have any questions.

Very truly yours,

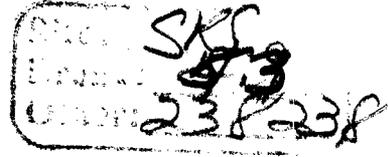
Robert C. Kirsch

RCK/ccd

cc: Audrey Zucker, Esq. (e-mail only)
MaryJane O'Donnell, Esq. (e-mail only)
Cynthia Bailey, Esq. (e-mail only)



200 Day Hill Road, Suite 200
Windsor, CT 06095
Phone: (860) 298-0541
Fax: (860) 298-0561



July 25, 2005

Ms. Karen Lumino
United States Environmental Protection Agency
One Congress Street
Boston, MA 02114-2010



SDMS DocID 238238

**Subject: Initial Group Comments on the Proposed Plan:
Supplements to the Administrative Record File
SRSNE Superfund Site, Southington, CT**

Dear Ms. Lumino:

Attached please find comments from the Solvents Recovery Service of New England, Inc. (SRSNE) Superfund Site PRP Group (the Group) on the May 2005 Proposed Plan for the SRSNE Site. These comments consist of information identified by the Group that was submitted to EPA in connection with the Remedial Investigation / Feasibility Study, and which should be part of the Administrative Record for the Site.

Table 1.0 summarizes the documents provided in .PDF format on the attached CD. The table is in the same format as that portion of the Administrative Record already prepared by EPA, divided into phase activity sections with documents listed in chronological order. Also included are document ID's, which identify the document file name on the data CD. For your convenience we have included 3 copies, so EPA may distribute these promptly to the appropriate public repositories.

These documents: (i) were considered or relied on in the selection of the response action; (ii) were circulated to third-parties for review and comment (e.g., for CTDEP comment); and/or (iii) represent information that is necessary in order to provide to the public a meaningful opportunity to participate in and comment on the remedy selection process for the SRSNE Site.

Please contact me if you have any questions about the attached. Additional substantive comments by the Group on the Proposed Plan will follow.

Sincerely,



Bruce Thompson

cc: SRSNE Site Group Executive Committee (w/o encl.)
SAFE Group (Site TAG Representative)

**Table 1.0
SRSNE Superfund Site
Documents for Administrative Record**

Remedial Investigation	
Title	Groundwater Technical Memorandum, Soils Study, and Additional Studies Report for the SRSNE Superfund Site Volume III - Additional Studies Report
Document Date	Jun-94
Document ID	CD/RI Documents/103
Author Org	ENSR Consulting and Engineering
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	440
Volume ID	Volume III - Additional Studies Report
Document Type	Memorandum
Phase Activity	Remedial Investigation
Title	Sample Identification Numbers/SRSNE
Document Date	21-Nov-94
Document ID	CD/RI Documents/104
Author Org	ENSR Consulting and Engineering
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	22
Document Type	Memorandum
Phase Activity	Remedial Investigation
Title	Results of Comprehensive Groundwater Sampling SRSNE, Southington, CT March/April, 1995
Document Date	19-Jun-95
Document ID	CD/RI Documents/105
Author Org	ENSR Consulting and Engineering
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	52
Document Type	Letter
Phase Activity	Remedial Investigation
Title	Comments on the Draft Remedial Investigation Work Plan Dated November 1995
Document Date	23-Jan-96
Document ID	CD/RI Documents/106
Author Org	State of Connecticut Department of Environmental Protection
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	9
Document Type	Letter
Phase Activity	Remedial Investigation
Title	SRSNE Superfund Site, Southington, CT, EPA Comments on Draft Remedial Investigation Work Plan and Draft Project Operations Plan
Document Date	4-Apr-96
Document ID	CD/RI Documents/107
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	9
Document Type	Letter
Phase Activity	Remedial Investigation

**Table 1.0
SRSNE Superfund Site
Documents for Administrative Record**

Remedial Investigation	
Title	SRSNE Superfund Site, Southington, CT, Approval of Remedial Investigation Work Plan and Draft Project Operations Plan
Document Date	14-Aug-96
Document ID	CD/RI Documents/108
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	3
Document Type	Letter
Phase Activity	Remedial Investigation
Title	SRSNE Superfund Site, Comments on the Draft Remedial Investigation Report
Document Date	22-Jan-98
Document ID	CD/RI Documents/109
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	2
Document Type	Letter
Phase Activity	Remedial Investigation
Title	SRSNE Superfund Site, Comments on the Draft Remedial Investigation Report
Document Date	27-Feb-98
Document ID	CD/RI Documents/110
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	6
Document Type	Letter
Phase Activity	Remedial Investigation
Title	SRSNE NPL Site- Letter to Gary Cameron to Martin Beskind dated July 27, 1999, "Proposal and Rational Regarding Ground-Water Background Location"
Document Date	2-Sep-99
Document ID	CD/RI Documents/111
Author Org	State of Connecticut Department of Environmental Protection
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	2
Document Type	Letter
Phase Activity	Remedial Investigation

**Table 1.0
SRSNE Superfund Site
Documents for Administrative Record**

Feasibility Study	
Title	First- Draft Feasibility Study Volumes I, II, III
Document Date	Nov-98
Document ID	CD/FS Documents/200
Author Org	Blasland, Bouck & Lee, Inc.
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	220
Volume ID	Volumes I, II, III
Document Type	Report
Phase Activity	Feasibility Study
Title	First- Draft Feasibility Study Appendices
Document Date	Nov-98
Document ID	CD/FS Documents/201
Author Org	Blasland, Bouck & Lee, Inc.
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	1005
Volume ID	Appendices
Document Type	Report
Phase Activity	Feasibility Study
Title	SRSNE - EPA Eliminates Soil Excavation From FS!
Document Date	2/28/00
Document ID	CD/FS Documents/202
Author Org	de maximis, inc
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	1
Document Type	email
Phase Activity	Feasibility Study
Title	Transmittal of Notes on the February 1, 2000 Meeting SRSNE, Inc Site RI/FS Oversight RAC I W.A. No. 007RSD-00108
Document Date	3/6/00
Document ID	CD/FS Documents/203
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	6
Document Type	Letter
Phase Activity	Feasibility Study
Title	Second - Draft Feasibility Study Volumes I, II, III
Document Date	Jun-00
Document ID	CD/FS Documents/204
Author Org	Blasland, Bouck & Lee, Inc.
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	310
Volume ID	Volumes I, II, III
Document Type	Report
Phase Activity	Feasibility Study

**Table 1.0
SRSNE Superfund Site
Documents for Administrative Record**

Feasibility Study	
Title	Second - Draft Feasibility Study Appendices
Document Date	Jun-00
Document ID	CD/FS Documents/205
Author Org	Biasland, Bouck & Lee, Inc.
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	1314
Volume ID	Appendices
Document Type	Report
Phase Activity	Feasibility Study
Title	SRSNE PRP Group Letter to USEPA Region 1, Mary Jane O'Donnell
Document Date	1/26/01
Document ID	CD/FS Documents/206
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	7
Document Type	Letter
Phase Activity	Feasibility Study
Title	EPA Response to January 26, 2001 SRSNE PRP Group Letter
Document Date	2/26/01
Document ID	CD/FS Documents/207
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	3
Document Type	Letter
Phase Activity	Feasibility Study
Title	Response to June 2001 Preliminary EPA/CTDEP Comments on June 2000 Draft Feasibility Study
Document Date	Nov-01
Document ID	CD/FS Documents/208
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	9
Document Type	Memorandum
Phase Activity	Feasibility Study
Title	DISTINGUISHING OUTWASH, ABLATION TILL, AND BASAL TILL WITHIN THE SRSNE SITE POTENTIAL OVERBURDEN NAPL ZONE
Document Date	6/21/02
Document ID	CD/FS Documents/209
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	4
Document Type	Memorandum
Phase Activity	Feasibility Study

**Table 1.0
SRSNE Superfund Site
Documents for Administrative Record**

Feasibility Study	
Title	SRSNE Site- Draft Feasibility Study - Remedial Action Objectives, General Response Actions, Technology Types, and Process Options
Document Date	7/11/03
Document ID	CD/FS Documents/210
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	4
Document Type	Table
Phase Activity	Feasibility Study
Title	SRSNE Site- Draft Feasibility Study - Identification and Screening of Remedial Technologies and Process Options for Saturated Soil Containing NAPL
Document Date	8/12/03
Document ID	CD/FS Documents/211
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	3
Document Type	Table
Phase Activity	Feasibility Study
Title	SRSNE Site- Draft Feasibility Study - Summary of Detailed Evaluation Criteria
Document Date	8/20/03
Document ID	CD/FS Documents/212
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	8
Document Type	Table
Phase Activity	Feasibility Study
Title	SRSNE Site- Initial Screening of Alternatives- Risks Posed, Principle Threats, Remedial Action Objectives and Related Process Options
Document Date	8/20/03
Document ID	CD/FS Documents/213
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	4
Document Type	Table
Phase Activity	Feasibility Study
Title	Revised Principle Threats and Remedial Action Objectives SRSNE inc. Site
Document Date	11/13/03
Document ID	CD/FS Documents/214
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	3
Document Type	Table
Phase Activity	Feasibility Study

**Table 1.0
SRSNE Superfund Site
Documents for Administrative Record**

Feasibility Study	
Title	Cost Experience Utilizing In Situ Thermal Processes to Address Chlorinated Solvent Volatile Organic Compound (CVOC) Contamination
Document Date	10/5/04
Document ID	CD/FS Documents/215
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	7
Document Type	Memorandum
Phase Activity	Feasibility Study
Title	Solvent Recovery Service of New England (SRSNE) Draft Feasibility Study - Comments by Eva Davis
Document Date	10/7/04
Document ID	CD/FS Documents/216
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	12
Document Type	Memorandum
Phase Activity	Feasibility Study
Title	Electrical Resistance Heating Technology Screening Report Solvent Recovery Service of New England
Document Date	11/4/04
Document ID	CD/FS Documents/217
Author Org	Thermal Remediation Services
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	18
Document Type	Report
Phase Activity	Feasibility Study
Title	Assessment Report on the Viability of In-Situ Thermal Treatment, Solvent Recovery Service of New England Superfund Site
Document Date	11/22/04
Document ID	CD/FS Documents/218
Author Org	Tetra Tech NUS, Inc.
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	25
Document Type	Report
Phase Activity	Feasibility Study
Title	Solvent Recovery Services of New England Site - Feasibility Study, Letter from SRSNE PRP Group Expressing Concerns About the Process of Finalizing the Feasibility Study and Selecting a Remedy for the Site
Document Date	2/23/05
Document ID	CD/FS Documents/219
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	17
Document Type	Letter
Phase Activity	Feasibility Study

**Table 1.0
SRSNE Superfund Site
Documents for Administrative Record**

Feasibility Study	
Title	Letter Response to Solvent Recovery Service of New England PRP Groups "Solvent Recovery Services of New England Site - Feasibility Study" Letter
Document Date	2/25/05
Document ID	CD/FS Documents/220
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	4
Document Type	Letter
Phase Activity	Feasibility Study
Title	Letter Response to EPA's "Solvent Recovery Services of New England Site - Feasibility Study" Response Letter
Document Date	3/7/05
Document ID	CD/FS Documents/221
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	6
Document Type	Letter
Phase Activity	Feasibility Study
Title	Third - Draft Feasibility Study Report
Document Date	Jun-04
Document ID	CD/FS Documents/222
Author Org	Biasland, Bouck & Lee, Inc.
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	418
Volume ID	Volumes I
Document Type	Report
Phase Activity	Feasibility Study
Title	Third - Draft Feasibility Study Appendices
Document Date	Jun-04
Document ID	CD/FS Documents/223
Author Org	Biasland, Bouck & Lee, Inc.
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	1564
Volume ID	Appendices
Document Type	Report
Phase Activity	Feasibility Study



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238239

August 8, 2005

Ms. Karen Lumino
Remedial Project Manager
US EPA Region 1 (HBO)
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SDMS DocID 238239

**Subject: PRP Comments on Proposed Plan
Solvents Recovery Service of New England (SRSNE) Site
Southington, Connecticut**

Dear Ms. Lumino:

This letter provides the comments of the SRSNE Superfund Site Potentially Responsible Parties (PRP) Group (the Group) on the Proposed Plan for the SRSNE Superfund Site (the Site) issued by United States Environmental Protection Agency (EPA) on May 31, 2005.

The Group's comments on the Proposed Plan are organized as follows:

A. Introduction and Overview

1. Executive Summary
2. Group Response Actions and Current Site Condition

B. Fundamental Flaws in EPA's Remedy Selection Process

1. EPA has not complied with Public Participation Requirements of CERCLA and the NCP.
2. EPA failed to address public concerns and desires as expressed in the Preliminary Reuse Assessment.
3. EPA violated CERCLA and the NCP by failing to contemporaneously compile a complete public administrative record during the remedy selection process.

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4. EPA violated the Administrative Order on Consent (AOC) for the Remedial Investigation / Feasibility Study (RI/FS) by failing to provide coherent, comprehensive comments on the Group's FS drafts.
5. EPA violated the CERCLA and the NCP by failing to specify measurable and achievable Remedial Action Objectives (RAOs) for each remedial alternative considered for the NAPL Zone

C. Selecting an Appropriate Final Remedy

1. No existing technology will fully remove non-aqueous phase liquids (NAPL) from overburden or bedrock at the Site
2. A Technical Impracticability (TI) Determination is appropriate for the SRSNE Site and is consistent with EPA remedy decisions at other Region I NAPL Sites
3. Contamination found in Town Wells No. 4 and No. 6 is the result of sources from other nearby sites, making these wells unlikely to be used in the future, regardless of the SRSNE remedy.
4. If EPA determines that partial mass removal is necessary, the current record supports the selection of Hydraulic Displacement and Enhanced In-Situ Bioremediation.
5. Compliance with the NCP requires that a cost-benefit analysis of partial NAPL mass removal be performed.
6. Any thermal remedy requires a pilot test
7. EPA's cost estimates in the FS and Proposed Plan are misleading and unsupported by the record.

D. Proposed Resolution of Issues

1. Promptly provide and prospectively maintain a complete and contemporaneous Administrative Record.
2. Reclassify the groundwater
3. Make TI determination for the NAPL zone

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4. Reconsider the NAPL zone remedy
5. If EPA nonetheless selects a thermal remedy, then use a pilot study to address major concerns and uncertainties
6. Allow for meaningful public participation and comment in connection with the pilot test.

E. Questions to be Answered by EPA

A. Introduction and Overview

A.1. Executive Summary of Comments

- a. EPA failed to inform and involve the public in the remedy selection process and failed to develop an adequate administrative record

EPA complete failure to inform and involve the public in the remedy selection process over the last 6 years and its failure to create and maintain an adequate, contemporaneous administrative record documenting the process violates the requirements of CERCLA and the NCP. As a result, the public was denied an effective opportunity to provide informed and meaningful comment on EPA's Proposed Plan.

- b. The Remedy proposed by EPA is not legally supportable

EPA's lack of the mandated and appropriate public participation, combined with its statutorily deficient Administrative Record and significant departures from delineation and remediation precedents established at other Region 1 Sites, combined with its lack of an adequate rationale for selecting thermal treatment at the SRSNE Site, make EPA's proposed remedial approach legally unsupportable.

- c. EPA policy and precedent support a Technical Impracticability (TI) determination and groundwater reclassification

Current in-situ remediation technologies are incapable of restoring groundwater to typical concentration and risk-based clean-up standards (ARARs) at sites impacted by dense NAPLs (DNAPLs). Accordingly, EPA has established a policy of determining that restoration of groundwater to drinking water quality at NAPL sites is not technically practicable using currently available technologies. EPA Region 1 has made such

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determinations at other sites with less contamination than exists at SRSNE and based on less compelling information than has been assembled and presented for SRSNE. Based on the Site record, EPA should make a similar TI determination for SRSNE. CTDEP should reclassify the groundwater at the Site to reflect the reality that Town Wells No. 4 and No. 6 will not be used in the future.

- d. Other remedial alternatives identified by the Group offer significantly less uncertainty and risk and lower cost than the thermal option selected by EPA

There is no legal requirement in CERCLA that mandates partial mass removal that will fail to achieve ARARs, and EPA has accordingly not required such treatment at other DNAPL sites in Region 1. However, if it is deemed necessary to perform active remediation of mobile NAPL at SRSNE, other options evaluated in the FS achieve this goal with less uncertainty, lower risks, lower costs, and a much higher degree of public acceptance. Unfortunately, EPA has not provided the public with an explanation of other options it considered and rejected. Therefore, the public remains uninformed of the remedial options and is unable to provide meaningful comment on those options to EPA.

- e. EPA's proposed thermal remedy raises concerns that must be resolved through a pilot test and further public involvement before it is implemented

EPA's decision to select thermal treatment at SRSNE has been seemingly preordained since 2001, despite precedents to the contrary at other Region 1 sites. The Group is concerned about potential risks and uncertainties associated with thermal treatment at this Site. The Group does not want to engage in the design and construction of a remedy that may ultimately be rejected by the public or be prohibitively difficult and costly to permit and operate. A successful pilot test is necessary before proceeding with EPA's proposed thermal remedy.

A.2. The Group's Remedial Actions and Extensive Investigation over the Last Decade have resulted in a Stable, Fully Contained and Well Characterized Site that poses No Current Risk to Public Health

In 1992, EPA notified more than 1,800 companies that had used SRSNE for solvent recycling of their potential liability for CERCLA investigation and clean-up costs. The Group is comprised of 265 of those companies that were not eligible to resolve their liability in the early de minimis settlements. When the Group formed, it established a

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“Strategic Vision” for the Site, which states in relevant part as follows: “The ultimate outcome of the PRPs’ involvement at the SRSNE site is that the site is remediated in a cost-effective manner to pose no unacceptable risk to human health or the environment, future use of the site is controlled to prevent future risks, and the public understands the issues involved and trusts the actions of the PRPs and the government.”

The Groups’ on-Site work started in 1994, with the “Non-Time-Critical Removal Action” (NTCRA 1). The Group has worked cooperatively with EPA and has spent over \$18 million under EPA’s guidance. During the course of the Groups’ work, human health risks posed by the Site have been all but eliminated. The most heavily contaminated soil remains covered with asphalt or concrete and is located inside a fence; and contaminated groundwater has been safely contained and treated. No contaminated water is used for drinking purposes, and deed restrictions prohibit installation or use of drinking water wells.

NTCRA Work Summary¹

- In May 1995, during NTCRA construction, “Non-Aqueous Phase Liquids” or “NAPLs” were encountered while drilling a new well and while abandoning certain existing wells.
- Since July 1995, the most significantly contaminated overburden groundwater has been successfully controlled by the NTCRA 1 system (a sheet-pile wall, 12 wells, and a treatment system). The NTCRA 1 system has consistently operated in compliance with the groundwater containment and treatment standards contained in the NTCRA 1 AOC. EPA informed the public of its intent to have this work conducted in a November 1994 Fact Sheet and at a December 6, 1994 Public Meeting. EPA received comments from the public at a January 5, 1995 Public Hearing, prior to the start of NTCRA construction.
- In 1996, the PRP Group took over the RI/FS process from EPA. Due to the extensive NAPLs located in soil and bedrock at the Site, EPA and the Group concluded that the RI/FS process would also include an evaluation of the technical practicability of restoring groundwater at the Site to drinking water quality within a reasonable time. EPA informed the public of this change in a July 1996 Fact Sheet that explained what additional work would be performed, and that the work would be performed by the PRP Group under EPA and CTDEP oversight.
- A “mitigation wetland” was designed and installed in 1995 to address the potential

¹ Key project milestones and opportunities for public participation are summarized below, and are detailed in Attachment A.

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risk that NTCRA 1 pumping would harm small wetland areas. NTCRA 1 pumping ultimately had no effect on any wetlands area.

- Public water was extended to three properties adjacent to the Site in 1997.
- A second, larger and deeper zone of contaminated groundwater was contained starting in 1998 with the addition of the NTCRA 2 pumping system. Over the last ten years, approximately 12,700 pounds of VOCs contained in more than 84 million gallons of groundwater was destroyed using an advanced oxidation process. Extracted NTCRA 2 water has consistently met the containment and treatment requirements of the NTCRA 2 AOC.
- Groundwater in the Town well field between the NTCRA 1 and 2 containment systems and the Town Wells now meets drinking water standards, due to the Group's installation and operation of those systems.
- The Group initiated a phytoremediation study in 1998. Today, 1.5 acres of willow trees reduce groundwater treatment volumes needed during the spring, summer, and fall months; and contribute to the natural degradation of contaminants.
- The remaining Operations Area buildings, above and below ground tanks, and other equipment abandoned by the owner of SRSNE were removed from the Site by the Group in 1999.
- In 2004, the Group established a clean area to serve as a parking lot to access a proposed northern extension of the town's "rails-to-trails" program. This area is covered with clean fill excavated from the construction of the adjacent mitigation wetlands.

Summary of Remedial Investigation/Feasibility Study Work:

In 1996, the Group took over the Remedial Investigation / Feasibility Study (RI/FS) work. The Group has completed the following significantly expanded RI/FS tasks.

- Completed RI/FS work plans and field work leading to the 1997 (draft) and 1998 (final) RI Reports. Investigations by the Group and others have installed 305 overburden and bedrock monitoring wells within a 50-acre area. Additional investigations further delineated the extent of contamination in Cianci Property soils, assessed whether sediment was contaminated in the adjacent Quinnipiac River, determined the extent of natural degradation, and evaluated whether a new VOC (1,4-dioxane) was present at the Site. An additional study is in progress to establish what level of naturally occurring inorganic groundwater contaminants will be

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considered representative of “background” conditions.

- Estimated the extent of NAPL in overburden and bedrock using a state-of-the art, multiple lines of evidence approach, including multi-component “effective solubility” analysis of VOCs in groundwater. One of the most widely respected DNAPL experts in the world, Bernard Kueper, PhD, PE, Chairman of the Department of Civil and Environmental Engineering at Queens University, assisted the Group. This process identified “probable” and “potential” NAPL zones in the soil and in the fractured bedrock. The resulting estimates of NAPL zone volumes were used when evaluating remedial approaches in the TI Evaluation.
- Funded a 1998 study of potential water supply alternatives for the Southington Water Department in order to improve the understanding of options to the potential future use of Town Wells No. 4 and No. 6. Wells sampled as part of the RI process revealed sources of VOC contamination closer to the Town Wells than SRSNE that will continue to contaminate those wells, regardless of conditions at the SRSNE Site. CTDEP files document other known and suspected sources of contamination of Town Wells No. 4 and 6, some of which are known DNAPL sites currently in the CT remedial process. Groundwater flow modeling concluded that the majority of flow to the Town Wells would be from the Quinnipiac River, with most of the groundwater flow to the wells from the area south of Curtiss Street, and only minimal flow from the direction of SRSNE.
- Prepared the November 1998 draft FS report and Technical Impracticability (TI) Evaluation, and responded to related EPA and CTDEP comments:
- Prepared the revised draft FS and TI Evaluation submitted in June 2000 and responded to EPA and CTDEP comments on same.
- Prepared the revised draft FS submitted in June 2004 and responded to related EPA comments.
- Studies performed in support of the June 2004 Draft FS found that naturally occurring bacteria (*dehalococcoides etheneogenes*) are present in the contaminated groundwater at the Site, and that those bacteria and others naturally and completely degrade the chlorinated solvents that make up most of the NAPL. Other natural processes degrade other VOCs in the NAPL. These studies estimated that natural biodegradation processes had safely and completely degraded significant quantities of NAPL. We estimate that during our ten years of NTCRA work, natural degradation processes have destroyed between 170,000 and 410,000 pounds of contaminants.

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- Alternatives for the NAPL Zone (ONOGU) analyzed in the final FS included:
 - ONOGU-1: No Action
 - ONOGU-2: Hydraulic Displacement and MNA
 - ONOGU-3: Hydraulic Displacement and Enhanced Bioremediation
 - ONOGU-4: Hydraulic Displacement, Chemical Oxidation and MNA
 - ONOGU-5: Thermal Treatment and MNA
 - ONOGU-6: Excavation and Offsite Disposal

The above-described studies and resulting documents demonstrate that there is no available remedy that will clean groundwater to drinking quality standards within the Site, absent hundreds of years of degradation, regardless of the amount of NAPL mass removed from the overburden.² Since the first draft FS was reviewed by EPA in 1999, the Group and EPA have agreed regarding many of the components now proposed for the overall Site remedy, including the following:

- the Operations Area and adjacent railroad grade soils should be capped;
- isolated areas of soil on the Cianci property contaminated with polyaromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), and metals should be placed under that cap;
- the culvert crossing the Cianci property should be replaced, and the wetland soils at the culvert outfall also should be placed under that cap;
- the future use of Site groundwater should be restricted; and
- contaminated groundwater should be contained and treated until it is demonstrated that natural degradation processes balance the ongoing dissolution of contaminants.

The key issue following this decade of site investigation and remediation is what, if any, remedial measures in addition to those outlined above, are appropriate for the overburden NAPL at the Site, consistent with the NCP and EPA guidance.

B. Fundamental Procedural and Substantive Flaws Have Resulted in EPA's Remedy Selection Process Being Arbitrary and Capricious and Otherwise Not in Accordance with Law

² Certain materials prepared by the Group were incorporated into the May 2005 Final FS Report, including the Appendices. However, the Group did not agree to many of the extensive rewrites and other substantive changes that EPA made to the final FS text and tables. Therefore the Group determined that it should not be considered the author of the final FS document.

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B.1. EPA has not complied with public participation requirements of CERCLA and the NCP.³

EPA has not kept the public informed of the remedy selection process as mandated by CERCLA and the NCP. This fundamental failure is reflected in the absence of numerous key documents relating to remedy selection which should have been included in the administrative record, contemporaneously, as they were drafted, reviewed and circulated for comment by EPA (see letter dated July 25, 2005 from Bruce Thompson of *de maximis, inc.* to Karen Lumino and attachments thereto). That failure is reflected in the absence of any substantive communication between EPA and the public about Site conditions and the remedy selection process over a nearly six (6) year period from August 1999 to May 2005.

The absence of meaningful communication over such an extended period would be problematic in the context of any CERCLA site. However, at the SRSNE Site, this failure to comply with the applicable statute and regulations is particularly problematic because of the volume of data EPA omitted, the relative novelty of the selected thermal option, and the extent to which EPA changed significant positions regarding the remedy selection process.

Notably, through late 2000, the PRP Group was working, with close guidance and direction from EPA staff, towards an FS document that was to screen out mass removal remedies for the "NAPL zone" because none would clean the groundwater to meet MCLs within a reasonable time. That process would have incorporated the concept of Technical Impracticability into EPA's selected remedial action. Indeed, as set out elsewhere in these comments, facts known about the Site suggest a TI waiver for groundwater remains the approach that meets Agency criteria for the SRSNE Site conditions and that it should be part of a remedy in an objective, legally compliant remedy selection process. However, in January 2001 EPA dramatically changed the direction of the FS analysis (see letter from Mary Jane O'Donnell of EPA to the PRP Group of January 10, 2001). PRP Group and EPA correspondence, which was not timely included in the administrative record, reflected this significant shift, but due to EPA's failure to maintain a legally compliant administrative record, the public was not made aware of the discussions or the change (see letter from Robert Kirsch, Esq. of Hale and Dorr, LLP to Mary Jane O'Donnell of January 26, 2001; and response from Gretchen Muench, Esq. of EPA to Robert Kirsch of February 26, 2001).

³ EPA's failure to inform the public includes lack of communication (addressed here) and the Agency's failure to prepare an adequate, contemporaneous public record. Section B.3., below, focuses on public record issues. This section (B.1.) explains how the combined lack of communication and absence of necessary records precluded the public from having its intended role under CERCLA and the NCP. There is, consequently, overlap and synergy between the deficiencies identified in Sections B.1 and B.3.

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EPA and the PRP Group have communicated extensively regarding their perspectives about the advantages and disadvantages of certain remedial approaches, and about the risks that may be associated with certain remedial alternatives. Most of these communications are reflected in submissions made by the PRP Group pursuant to the Administrative Orders on Consent (“AOCs”) in this case, and the related comment and response process engaged in by EPA and the PRP Group. However, the public remained completely unaware of these communications and, therefore, had no opportunity to understand and comment on the significant issues involved. No last minute communications blitz can cure the deficiencies in the current process. Nor would it be sufficient for EPA merely to extend its comment period now or to meet quickly with the public in an effort to cure the glaring defects in the process used at this Site.

More recently, as the Group complied with EPA’s instructions to analyze unproven thermal treatment options, and despite the Group’s concern that CERCLA policy and prudent practice called for a remedy that incorporated a Technical Impracticability waiver, EPA and the Group communicated extensively regarding potential remedies. This included a discussion regarding how the use of an artificial discount rates contrary to Office of Management and Budget policy could influence those cost numbers, as well as the need for and benefits of data that would be generated in a thermal pilot study, and potential risks to community members and site workers of vapor release and contaminant migration that may be associated with certain thermal remedies.

Additionally, the remedy EPA has identified in its May 2005 Proposed Plan is highly technical, and understanding it – and the issues surrounding how and why it was selected – has been challenging even for members of the PRP Group who are participating on a regular basis in the remedy selection process. To suggest that any member of the general public could readily understand what EPA proposes to do, and, equally importantly, what it has decided it will not do based on the state of the public record in May 2005, would be disingenuous, at best.

The above list merely offers examples of the deficiencies in the public record and lack of compliance with CERCLA and the NCP. It is not intended to be an exhaustive recitation of the relevant substantive communications between EPA and the PRP Group. What is irrefutable is that, due to the total absence of communication between EPA and members of the public (we are aware of no written or verbal communication describing any of the above developments to the public), there is no reasonable basis to believe that community representatives with previous, clearly expressed concerns about the Site will have the time or resources to understand anything about the recent developments simply by examining EPA’s Proposed Plan or the meager administrative record prepared for EPA by its contractor. Moreover, the absence of any indication in the administrative record of any communications to the public or of the opportunity for

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the public to review or even be aware of the exchange of ideas and information contained in the major draft deliverables provided to EPA by the PRP Group also means that anyone relying on the public record or on EPA's communication plan would not have had the benefit of the information contained in them. Expressed succinctly, this lack of communication and the total inadequacy of the public record make it impossible for even a sophisticated participant to comment meaningfully on EPA's proposed remedy. A method that renders such public participation so difficult, and even virtually impossible, is contrary to the requirements of CERCLA and the NCP. See 42 U.S.C. § 9613 and 9617.

- CERCLA § 113 defines certain minimum procedural requirements that EPA must satisfy in the remedy selection process. Under that Section, EPA must provide notice to the public which includes a brief analysis of the plan and alternative plans that were considered. EPA must provide a reasonable opportunity for the public to comment and provide information regarding the plan.

EPA has failed to meet those obligations in this instance.

- § 117 of CERCLA requires EPA to "publish a notice and brief analysis of the proposed plan and make such plan available to the public" before adopting any plan for remedial action at a site. The notice and brief analysis must include "sufficient information as may be necessary to provide a reasonable explanation of the proposed plan and alternative proposals considered." See 42 U.S.C. § 9617(a). This Section requires EPA to include in the public record all documents that EPA develops or receives in conjunction with the remedy selection process at a site, to the extent those documents are needed in order to provide the public with a reasonable explanation of the proposed plan and any alternative considered. The objective of that Section is to provide to the public an opportunity to comment meaningfully in this significant process.

The total absence of substantive communication from EPA to the public failed to satisfy even the minimum obligations of CERCLA § 117.

As previously noted, EPA's failure in this regard is particularly troubling at this Site. The SRSNE PRP Group has gone to great lengths to address questions posed by EPA and, in many instances, voluntarily provided information and data relevant to the remedy selection process. In its May 2005 Proposed Plan, EPA has selected a complex collection of technologies and work to accomplish certain remedial action objectives. Such measures are presumably necessary, in EPA's view, because of the details of conditions at the SRSNE Site. However, the

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public record and the record of communication between EPA and the public generally, is devoid of information that would provide the foundation for public understanding of these Site conditions and for meaningful public comment regarding EPA's proposed remedy.

The mandate to keep the public informed through the remedy selection process is not limited to CERCLA. Such requirements also are mentioned throughout the NCP and in EPA guidance. The statute, regulations and Agency Guidance all three require EPA to keep the public adequately informed throughout the remedy selection process so that the public will have a "reasonable opportunity" to comment on EPA's remedial plan. The common objective of all three sources is that the public have the opportunity to comment meaningfully on EPA's proposed plan, which requires that the public have access to the information necessary for it to understand the deliberative process.

The NCP mandates that EPA "ensure that all appropriate public and private interests are kept informed that their concerns are considered throughout a response." 40 CFR § 300.155(a). The community relation requirements are "intended to promote active communication between communities affected by discharges or releases and EPA." 40 CFR § 300.155(c). EPA's obligation is not limited to informing the public once it has made a decision. Rather, the NCP anticipates and, indeed, mandates that EPA prepare and implement a community relations plan to inform and involve the public throughout the CERCLA process by providing "appropriate opportunities for involvement in a wide variety of site-related decisions, including site analysis and characterization, alternatives analysis and selection of remedy. 40 CFR § 300.430(c)(2)(ii)(A).

Communications from EPA are to be supplemented and coordinated with materials EPA maintains in an ongoing administrative record, which it must make available to the public. The regulations require that EPA must maintain "at least one information repository at or near the" site, containing information for the public. 40 CFR § 300.430(c)(2)(iii). The record, therefore, should allow interested members of the public to discern the dialogue and analysis that went into the design and completion of the RI/FS over the past ten years and as a result to have at least a basic understanding of the key technical issues and choices inherent in EPA's selection of a remedy at this site.

In its preamble to the NCP (55 FR9768), EPA stated that it:

agrees that the lead agency should provide citizens and PRPs with access to the same technical information about the site throughout the cleanup process and believes that the NCP provides this access. As

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required by the statute, the NCP provides for the establishment and public availability of the administrative record files for each response action. These files generally will become available early in the decision making process and will include the types of documents [used in "decision making" concerning the scope of the sampling programs, definitions of affected populations, assumptions made during risk assessments, establishment of remedial action objectives, and many other issues that are central to the final selection of the remedy period]. Members of the public are provided an opportunity and are encouraged to review the document prior to or during the comment period. In addition, citizen understanding of complex technical issues will be improved if lead agencies and PRPs, where conducting response actions, produce clear and understandable summaries of technical documents. EPA intends to work with PRPs in the preparation of summaries of technical documents for the public to the extent that summaries are not already included in fact sheets, updates, and the proposed plan. Lead agencies should provide copies of these summaries in the information repository and, where appropriate, the administrative record file.

The process and record here have not complied with the above requirements.

To complement the public information requirements, the information repository must contain all items that are made available to the public. See 40 CFR § 300.430(c)(2)(iii). In the NCP, EPA elected not to include an explicit requirement that a lead agency conduct meetings and briefings on the RI development process, in part, based on the expectation that the public would have access to the full administrative record and the information Repository Record as it was being developed, and therefore could advance questions as the work went forward. See 55 FR 8767 (March 8, 1990).

The RI/FS and remedy selection process at the SRSNE Site required nearly 10 years to complete and resulted in a voluminous and highly technical record. Yet, between November 1998 and May 2005, EPA added nothing substantive to the administrative record or the information repository. EPA thus left the public in the dark, despite the active participation earlier in the process of a citizens group (SAFE) that was funded in part by a technical assistance grant.⁴

⁴ EPA last communicated meaningfully with the public in connection with a September 1999 open house. Although a June 1998 update had informed the public of the Technical Impracticability concern raised by the Site, and the 1999 public meeting generally addressed the options reviewed in the 1998 draft, nothing in the record explains EPA's turnabout on that issue. EPA did not share with the public or include in the administrative record the November 1998 draft FS, or the January 2001 – February 2001 communications with the Group, which first articulated EPA's dramatic change of approach. EPA did not put the June

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Nor has the prejudice resulting from the EPA's failure to meet its public information and information repository requirements been limited to the general public. EPA's lapse has had a negative impact on the PRP Group. Rather than being able to rely on EPA to compile a complete administrative record, the Group has undertaken many hours of research to locate and provide to EPA materials that EPA should have contemporaneously placed into the administrative record (see letter of *de maximis, inc.* to Karen Lumino of EPA dated July 25, 2005).

Although the addition of the materials attached to the letter referenced above to the administrative record and to the information repository results in belated compliance with the NCP and CERCLA, it is impossible, both practically and legally, for the late addition of those materials to provide the public with a meaningful opportunity to comment on the proposed plan. The NCP preamble states unequivocally that "the public comment period should be long enough to allow sufficient review of the proposed plan and the key documents in the administrative record, and should take into account the length and complexity of the information under review at such time." 55 FR 8666, 8770 (March 8, 1990). Here, EPA absolutely failed to provide key documents and information to the public, the response action process already has been lengthy, circuitous and complex. EPA is now racing to issue its decision document by the close of its current fiscal year. These factors, taken together, indicate that the process used by EPA can not provide the thoughtful and meaningful public input opportunities mandated by law.

B.2. EPA failed to address public concerns and desires as expressed in the Preliminary Reuse Assessment

Another criterion for EPA's remedy selection process is "public acceptance" of the proposed alternative. Community desires were expressed at the June 30, 2005 Public Hearing on the Proposed Plan, and in the Preliminary Reuse Determination (EPA, September 2003). EPA presumably will address the June 30, 2005 public comments in its Record of Decision (ROD). However, EPA failed to address the clearly stated public desires and priorities that EPA published in its own Preliminary Reuse Determination. Specifically, the "Potential Use/Reuse Issues and Considerations" Section of the determination states: "Neighboring residents would oppose any reuse that would utilize hazardous substances or result in air emissions."

2000 FS draft or its related comments in the administrative record; nor did it otherwise make them available to the public. EPA similarly kept from the public and the administrative record the June 2004 FS draft and its comments on it.

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The “Potential Future Uses” Section then states: “Town officials are extremely interested in the future reuse of this railroad ROW as a component of their existing rails to trails project. This is the only reuse scenario being considered by the stakeholders, which include the PRP Group, neighboring residents, town officials and the CTDEP which owns the railroad corridor. The PRP Group has informally committed to incorporate the construction of the rail line into a protective remedy that allows for that use.”

The “Potential Use/Reuse Issues and Considerations” Section further states: “Local officials and residents would like the rails to trails conversion to be completed as soon as possible and would advocate an appropriate remedy design that provides flexibility in completing construction of the rail trail prior to overall site completion.”

Contrary to these expressed wishes of the local officials and residents, the risks associated with thermal treatment of the ONUGU involving hot soils, vapors and high-voltage electricity means that the rails to trails conversion necessarily will be delayed until the thermal treatment remedy is designed and implemented. The fastest route to rails to trails conversion would, of course, be immediate capping and a TI determination with groundwater reclassification containment and no active NAPL Zone remedy. However, even if active remediation is required, it is clear that the Hydraulic Displacement alternative, which would be several years shorter to completion than the thermal treatment alternative selected by EPA, is preferable in meeting Town and citizen objectives.

The Public’s legitimate concern about the risks associated with vapors at SRSNE likely will be even greater when the community learns that in June 2005 at the Durham Meadows Site (also in Connecticut) EPA’s FS addressed similar thermal options and screened them out from further consideration, stating: “Screened Out: Not as effective due to volatilization concerns to nearby inhalation receptors.” This conclusion stands in stark contrast to what EPA told Southington residents at its Public Meeting held on June 8, 2005, when EPA said that the risks associated with thermal treatment are manageable. The opposition of the residents living near the SRSNE Site to any remedial alternative that results in air emissions cannot be overstated. EPA has dismissed these concerns without providing the residents with sufficient information regarding the emissions issues.

B.3. EPA violated CERCLA and the NCP by failing to contemporaneously compile a complete public administrative record during the remedy selection process

Exacerbating the deficient public communication process outlined above (See B.1.), EPA has failed to comply with the requirements of CERCLA and the NCP to compile a

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complete, contemporaneous administrative record during the Feasibility Study and remedy selection process. EPA's failure to make key documents available from 1998 until May 2005 aggravated its lack of public communication and deprived the public of the opportunity to understand both the Feasibility Study and remedy selection process.

CERCLA § 113(k) requires EPA to establish an administrative record upon which it must base its selection of a response action. 42 U.S.C. § 9613(k)(1); *see also* 40 C.F.R. § 300.800(a) ("the lead agency shall establish an administrative record that contains the documents that form the basis for the selection of a response action"). CERCLA § 113(k) also requires EPA to "provide for the participation of interested persons, including potentially responsible parties ("PRPs"), in the development of the administrative record on which [EPA] will base the selection of remedial actions" 42 U.S.C. § 9613(k)(2)(B). For remedial actions, the administrative record must include "*all items* developed and received under [§ 113(k)(2)(B)]," which include the documents that are necessary to satisfy the CERCLA public participation requirements. *Id.* Accordingly, the administrative record must contain all documents that the public would need, and must contain the documents in a timely manner, so that the public has a "reasonable opportunity" to review and comment on the remedial plan and any alternative plans considered by EPA.

The NCP requires that the administrative record file for the selection of a remedial action "be made available for public inspection *at the commencement of the remedial investigation phase,*" and at such time, "the lead agency must publish in a major local newspaper of general circulation a notice of the availability of the administrative record file." 40 C.F.R. § 300.815(a) (emphasis added). EPA's *Final Guidance on Administrative Records for Selecting CERCLA Response Actions*, ("Administrative Record Guidance"), (OSWER Directive #9833.3A-1, p. 13, December 3, 1990) clarifies that:

"When the remedial investigation/feasibility study (RI/FS) work plan is approved, the lead agency must place documents relevant to the selection of the remedy generated up to that point in the record file. Documents generally available at that time include the preliminary assessment (PA), the site investigation (SI), the RI work plan, inspection reports, sampling data, and the community relations plan. *The lead agency must continue to add documents to the record file periodically after they are generated or received during the RI/FS process.*"

(emphasis added) *see also* 55 FR 8666, 8800 (March 8, 1990) ("PRPs are given a chance to participate in the development of the administrative record *throughout its compilation.*"). The Administrative Record Guidance also describes the following statements as "principles [that] should be applied in establishing the administrative record":

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- the record should be compiled as documents relating to the selection of the response action *are generated or received* by the lead agency;
- the record should include documents that form the basis for the decision, *whether or not they support the response selection*; and
- the record should be a *contemporaneous* explanation of the basis for the selection of a response action.

Id. at 2 (emphasis added). The NCP Preamble, states that “[t]he regulations ... *require* that some of the documents specifically requested by some commenters (sampling results, risk assessments, and others) are placed in the administrative record *as soon as they are available for public review.*” 55 FR 8666, 8769 (March 8, 1990). Moreover, the NCP Preamble specifies that “[l]ead agency staff should complete any necessary reviews of documents *as quickly as possible* so they can be released to the public and placed in the information repository and the administrative record.” *Id.* at 8768 (emphasis added).

EPA is not required to include documents in the administrative record file that do not form a basis for the selection of the response action. 42 U.S.C. § 9613(k)(1) The NCP provides that “such documents include, but are not limited to draft documents, internal memoranda, and day-to-day notes of staff *unless such documents contain information that forms the basis of selection of the response action and the information is not included in any other document in the administrative record file.*” 40 C.F.R § 300.810(b) (emphasis added). EPA then clarifies this requirement by providing that:

“...if a draft document or internal memorandum is circulated by the lead agency to other persons (e.g., the support agency, PRPs, or the general public) *who then submit comments which the decision maker considers or relies on* when making a response action decision, relevant portions of the draft document or the memorandum and comments on that document should be included in the record file.”

Administrative Record Guidance at 13 (emphasis added); *see also* 55 FR 8666, 8800 (“an administrative record will contain the public comments submitted on the proposed action, even if the lead agency rejects the comments, because the lead agency is required to consider these comments and respond to significant comments in making a final decision. Thus, these comments also “form the basis of” the final response selection decision.”) and 8801 (“a draft which has been released to the public for the purpose of receiving comments is also part of the record, along with any comments received”).

At SRSNE, EPA has violated the mandates of CERCLA and the NCP by failing to contemporaneously compile the administrative record file. EPA failed to provide in the

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Site's administrative record the prior draft Feasibility Study documents, which included the Group's proposed drafts and submittals, EPA's and CTDEP's comments thereon, and the Group's responses to EPA's and CTDEP's comments. Moreover, EPA violated the requirements of CERCLA by failing to incorporate into the administrative record all documents upon which it based its selection of the proposed remedy, such as the drafts of the Feasibility Study and additional major deliverables, data and correspondence from 1998 to 2005.

Given the complex nature of the Site, and the associated CERCLA deliverables, informed, meaningful public participation in the remedy selection process would only have been possible if the Group's deliverables were made available by EPA for public review as they were generated and circulated for third-party review (e.g., by CTDEP, other offices within EPA, and by EPA's outside contractors). However, only one document (the NAPL Delineation Report) relating to the Feasibility Study and remedy selection process was added to the administrative record at the Site by EPA between 1998 and the issuance of EPA's Proposed Plan in May 2005. The administrative record for the Old Southington Landfill Site included more than 100 entries of Group RI/FS deliverables. In contrast, the SRSNE administrative record only includes 22 entries pertaining to the Group's RI/FS deliverables. Of these 22 entries, there were no substantive documents added for the time between 1998 and 2005 relating to the Feasibility Study and remedy selection process.

EPA's failure to comply with CERCLA's requirements in compiling the administrative record file not only deprived the public of meaningful opportunities to become informed about and to participate in the remedy selection process, but also compromised potential future judicial review. Indeed, the record as compiled and released by EPA to the public in May 2005 is virtually devoid of information regarding the remedy selection process, remedial alternatives, and the underlying issues at this large and complex site. (Note that the Group provided a list of 27 reports, documents, letters, and data deliverables, and electronic copies of those documents on CD-ROM, under separate cover dated July 25, 2005, to supplement the Site's administrative record.)

B.4. EPA violated the Administrative Order on Consent for the RI/FS by failing to provide coherent, comprehensive comments on the Group's Feasibility Study drafts

EPA further compromised the remedy selection process by failing to comply with the AOC under which the Group performed the RI/FS. Instead of providing the Group with timely, coherent and comprehensive comments on the Group's June 25, 2004 draft FS, and including those comments in the administrative record, EPA provided piecemeal oral and e-mail comments, unilaterally rewrote major portions of the FS and arbitrarily directed the Group to rewrite other portions.

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Paragraph 57 of the RI/FS AOC for the RI/FS and NTCRA, which is titled "Deliverables requiring EPA Approval," allows EPA to take the following actions after review of any deliverable submitted by the Group under the AOC: (i) approve the deliverable; (ii) approve the deliverable upon specified conditions; (iii) disapprove the deliverable and notify the Group of deficiencies; (iv) disapprove the deliverable and modify the deliverable itself to cure any deficiencies; or (v) any combination of the above.

EPA failed to comply with these terms in reviewing the third draft Feasibility Study submitted by the Group, dated June 25, 2004. EPA did not take any of the actions specified in the AOC. Rather than acting in accordance with Paragraph 57, EPA initially provided partial verbal and e-mailed comments regarding the Feasibility Study, and then substantially and unilaterally deleted much of the Group's text and rewrote Sections 1, 2, and 3 of the Feasibility Study text instead of providing comments. EPA's failure to follow the process prescribed in the AOC both compromised the integrity of the Feasibility Study process and prevented the development of an administrative record that included EPA comments on the Group's drafts and the Group's responses to EPA's comments. The absence of such documents in the record obscures from the public key issues on which EPA and the Group disagreed relating to the selection of an appropriate remedy for the Site.

B.5. EPA violated CERCLA and the NCP by failing to specify measurable and achievable Remedial Action Objectives (RAOs) for each remedial alternative considered for the NAPL Zone (ONOGU)

As noted above, the remediation of the "NAPL Zone" is the issue on which EPA and the Group have the greatest difference. While it is clear that no technology currently exists that will achieve applicable groundwater standards (ARARS) at the site in less than 100-200 years, the Group believes the response required in this situation by the NCP is a Technical Impracticability (TI) determination - - i.e., that it is impossible to achieve ARARS within a reasonable time. EPA, on the other hand, has proposed an in-situ thermal technology for the ONOGU which, while it may remove substantial NAPL mass, will inevitably leave in place a long-term source of groundwater contamination. A key factor that contributed to EPA's remedial choice was the Agency's failure to specify an appropriate Remedial Action Objective (RAO) as required by the NCP. That failure leaves the public without any rational benchmark against which to evaluate EPA's proposed remedy for the ONUGU. Moreover, without an NCP-compliant RAO, EPA lacks a principled and legally supportable basis for its ONOGU remedial standard.

The NCP requires EPA to develop remedial alternatives that "protect human health and the environment by recycling waste or by eliminating, reducing, and/or controlling risks posed through each pathway by a site. 40 C.FR § 300.430(e)(2). In developing the

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remedial alternatives, the NCP further requires EPA to “establish *remedial action objectives* specifying contaminants and media of concern, potential exposure pathways, and remediation goals.” 40 C.F.R § 300.430(e)(2)(i) (*emphasis added*). EPA clarified in the NCP Preamble that “remedial action objectives aimed at protecting human health and the environment should specify (1) the contaminants of concern, (2) exposure routes and receptors, and (3) an *acceptable contaminant level or range of levels* for each exposure medium (i.e., a preliminary remediation goal).” 55 FR 8666, 8713 (March 8, 1990) (*emphasis added*) *see also* EPA, Office of Solid Waste and Emergency Response, *GUIDANCE FOR CONDUCTING REMEDIAL INVESTIGATIONS AND FEASIBILITY STUDIES UNDER CERCLA*, Interim Final, OSWER Directive 9355.3-01, p. 4-7, October 1988 (incorporating above-quoted language from the NCP Preamble). EPA has incorporated this guidance in several additional guidance documents. *See e.g.*, EPA, Office of Solid Waste and Emergency Response, *A GUIDE TO PREPARING SUPERFUND PROPOSED PLANS, RECORDS OF DECISION, AND OTHER REMEDY SELECTION DECISION DOCUMENTS*, OSWER Directive 9200.1-23P, p. 6-62, July 1999 (Remedial action objectives (RAOs) should include a “clear statement of the specific RAOs for the operable unit or site (e.g., treatment of contaminated soils above health-based action levels, restoration of ground-water plume to drinking water levels, and containment of DNAPL source areas) and reference a list or table of the individual performance standards.”).

EPA failed to comply with the NCP by not establishing quantitative contaminant and media-specific remedial action objectives for the overburden NAPL zone. Rather, in its January 2001 comments on the June 2000 draft FS, EPA initially proposed a qualitative remedial objective for this media, i.e. to “remove as much mass as practicable,” which bears no clear relationship to quantitative risk-based criteria. That objective was restated in the Proposed Plan as “to reduce VOC concentrations to levels that are not indicative of the presence of pooled or residual NAPL.” Which risks (if any) posed by the Site will be reduced, and to what extent, if the remedial goal is achieved, have not been identified by EPA. As a result, it has been difficult, or indeed impossible, for EPA, the public or the PRP Group to evaluate and compare the remedial alternatives that EPA has been considering for the Site in terms of their relative performance (e.g., risk reduction, etc.) in achieving an objective cleanup standard. And, it will be likewise difficult or impossible to objectively determine the success and completion of the selected remedy.

EPA's plan lacks a remedial goal for the ONOGU media that is measurable and achievable, and does not lead to measurable and meaningful risk reduction. EPA has derived a subjective qualitative set of RAOs for the ONOGU which do not permit a clear determination of a successful remedial end point, nor allow for the achievement of ARARS in a reasonable time frame. Such an approach not only fails to comply with the requirements of NCP, but is by its very nature arbitrary and capricious.

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C. Selecting an Appropriate Final Remedy

C.1. No existing technology will fully remove the NAPL "source" from overburden or bedrock at the Site.

EPA has acknowledged that current in-situ remediation technologies are incapable of restoring groundwater to typical concentration based clean-up standards (ARARs) at sites impacted by DNAPLs. The EPA Assistant Administrator issued direction to all Regional Administrators to incorporate Technical Impracticability in remedial decisions in a July 31, 1995 memorandum titled "*Superfund Groundwater RODs: Implementing Change This Fiscal Year.*" The relevant parts of this memorandum state:

"During our meeting, we discussed the fundamental changes that have occurred in the program's approach to sites with contaminated groundwater where contamination may be "technically impracticable" to restore to drinking water standards (e.g., where contaminants such as dense non-aqueous phase liquids (DNAPLs) warrant our use of a waiver of Federal and/or State clean-up standards (ARARs)). Based on the information now available on the special problems associated with DNAPL sites, OSWER now expects that Technical Impracticability (TI) waivers will generally be appropriate for these sites."

"Beginning immediately, RODs addressing DNAPL contamination that do not follow the policy in favor of TI waivers at such sites must include written justification for that departure from this policy."

The inability to remove sufficient mass to meet groundwater clean-up standards stems primarily from subsurface heterogeneity, DNAPL in fractured bedrock, and the fact that clean-up standards are typically 4 to 5 orders of magnitude lower than existing concentrations at most sites (including the SRSNE Site). Achieving "complete clean-up" translates to removal of nearly 100% of the contaminant mass that is present as DNAPL, dissolved in groundwater, adsorbed to aquifer solids, and diffused into low permeability regions. We are not aware of any site where groundwater has been restored to drinking water quality where appreciable quantities of DNAPL are present below the water table. The technical impracticability of complete restoration of groundwater to desired clean-up standards is recognized in a variety of publications and EPA documents (e.g., EPA, September 1993; January 1995; July 1995; December 2003).

Although it is not possible to restore groundwater completely to otherwise applicable clean-up standards using present day technologies, the question remains as to whether or not partial mass removal efforts should be implemented at sites such as SRSNE. Partial mass removal technologies should be employed only if they can achieve a

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predictable and measurable reduction in risk in a safe, cost-effective, and timely manner. Thermal technologies do not meet these objectives for the following reasons:

- Thermal technologies are still under development with respect to application below the water table and are not yet 'proven' technologies. The extent to which groundwater concentrations would be reduced, the degree of mass reduction, and the risks of unwanted vertical DNAPL mobilization and/or vapor release are not predictable. We are not aware of any sites where thermal technologies have been applied where there is pooled DNAPL in a heterogeneous, low-to-medium permeability overburden above fractured bedrock that contains dipping fractures, as exists at SRSNE. The fact that thermal technologies are not yet 'proven' and the fact that the benefits of partial mass removal cannot be predicted reliably are evidenced by the large number of research projects currently being carried out to address these issues. Major US Government funded current research projects include the following:
 - ESTCP project CU-0314: Critical Evaluation of State-of-the-Art In Situ Thermal Treatment Technologies for DNAPL Source Zone Treatment;
 - SERDP projects CU-1292: Decision support system to evaluate effectiveness and cost of source zone treatment;
 - CU-1293: Development of assessment tools for evaluation of the benefits of DNAPL source zone treatment;
 - CU-1295: Impact of DNAPL source zone treatment: experimental and modeling assessment of benefits of partial source removal;
 - CU-1423: Large scale physical models of thermal remediation of DNAPL source zones in aquifers;
 - CU-1458: In situ thermal remediation of DNAPL source zones.

The uncertainty regarding the benefits and risks of implementing aggressive partial mass removal technologies is also recognized in the EPA expert panel report titled "The DNAPL Remediation Challenge: Is There a Case for Source Depletion?" (December 2003), where it is stated that:

"Adverse impacts of DNAPL source depletion could include: 1) expansion of the DNAPL source zone due to mobilization of residual DNAPL, 2) undesirable changes in the DNAPL distribution, and 3) undesirable changes in the physical, geochemical, and microbial conditions that may cause long-term aquifer degradation, and/or may adversely impact subsequent remediation technologies. All of these adverse impacts could increase life-cycle costs of site clean-up.

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Quantitative predictions of these potential benefits and adverse impacts to aid decision making on whether to implement DNAPL source depletion actions are highly uncertain. These uncertainties remain as significant barriers to more widespread use of source depletion options.”

Numerical models are not yet capable of simulating thermal remediation using a realistic set of input parameters that properly represent overburden heterogeneity and fractures present in bedrock – making evaluation of potential implementation scenarios that much more difficult. It is arbitrary and capricious to commit more than \$17 million to research and develop a technology that is currently unproven and unpredictable for the application being considered at SRSNE, and which, as discussed below, EPA has chosen not to apply at similar sites under EPA’s control.

- Thermal technologies risk vertically mobilizing DNAPL downward into fractured bedrock at the SRSNE site, even if a "hot floor" were to be designed and implemented. The vaporization of DNAPL under thermal treatment can result in condensation fronts leading to increased DNAPL mobility. The transfer of DNAPL from overburden to bedrock at the SRSNE site would be particularly problematic given the fact that the bedrock is most permeable in a direction that dips approximately 22 degrees below horizontal in an east to southeast direction. Given the low storage capacity of bedrock for DNAPL, even small to moderate amounts of DNAPL mobilized into bedrock could migrate a significant lateral distance to the east – southeast. It is certainly possible that thermal treatment could mobilize enough DNAPL into bedrock to bring about DNAPL migration to locations east of the Quinnipiac River. The ratio of overburden to bedrock DNAPL storage capacity can be approximated using the ratio of overburden porosity to bedrock fracture porosity. For the SRSNE site, this ratio is approximately 4,000 to 1 (BBL, June 1998), implying that mobilizing DNAPL that is present in 1 cubic yard of overburden may occupy 4,000 cubic yards of bedrock.
 - Because successful plume recovery and source zone hydraulic containment systems currently exist at the Site, thermal technologies are not a cost-effective means of achieving the stated remedial action objectives, especially in light of the risk of NAPL mobilization into bedrock.
- C.2. A Technical Impracticability Determination is Appropriate for the SRSNE Site and Consistent with EPA Remedy Decisions at Other Region I NAPL Sites**

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EPA's *Guidance for Evaluating the Technical Impracticability of Groundwater Restoration*, Interim Final, OSWER Directive 9234.2-25, September 1995 (the TI guidance) recognizes that groundwater at certain sites is technically impracticable to restore to ARARS due to hydrogeologic complexities and/or chemical-specific limitations. In such cases, the site owner may petition for a waiver of groundwater ARARs by preparing a TI Evaluation describing the site conceptual model, the aspects of the site that render groundwater restoration impracticable, and the specific chemicals for which a TI waiver is sought.

In the RI/FS AOC Statement of Work (SOW), EPA appropriately directed that the RI/FS process for SRSNE include a TI Evaluation (see SOW Section 3.III.C). In the development of the RI Work Plan (BBL, November 1995), the Group documented its agreement with EPA that the SRSNE Site is ideally suited for a TI waiver of groundwater ARARs. With EPA's support and comment, the RI Work Plan presented a preliminary TI Evaluation, including specific sections including: a Preliminary Site Conceptual Model (Section 3.2); Data Requirements for Ground-Water Technical Impracticability Determination (Section 4.2.2); a detailed introduction to DNAPL migration and distribution (Appendix A); and evaluation of remedial technologies that may be considered for application within the potential NAPL zone (Appendix B). EPA approved the RI Work Plan indicating that the extent of the TI Zone remained to be determined, but expressing no disagreement with the Work Plan conclusion that a TI waiver for groundwater ARARs is appropriate for the SRSNE Site.

As part of the FS, and for the express purpose of providing sufficient data to support a TI Evaluation as part of the FS, several types of specialized data acquisition and evaluation techniques, and substantial field investigation activities were performed during the completion of the RI between June 1996 and July 1997. The RI Report presented key aspects of Site conditions considered directly relevant to TI Evaluation, including:

- the presence of a large volume of NAPLs in the overburden and bedrock formations (Sections 4.2 and 5);
- the presence of NAPL at a depth of at least 100 feet below grade (60 feet into bedrock), and potentially as deep as 200 feet or more below grade (160 feet into bedrock) (Section 4.2);
- the relatively large extent of the overburden and bedrock potential NAPL zones, which cover approximately 12.4 and 14.2 acres, respectively (Section 4.2.2);
- the small-scale complexity and heterogeneity of the overburden deposits within the overburden NAPL zone, including silt, sand, and gravel strata with a variety

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of dip angles and hydraulic conductivity values ranging by several orders of magnitude, and pinch out within a few feet; (Sections 3.2.1 and 3.4.2);

- the low to moderate mean hydraulic conductivity of the soils within the overburden NAPL zone (Section 3.4.2);
- the bedrock fracture and matrix characteristics, which indicate that the bedrock hydraulic conductivity is extremely heterogeneous on a minute scale, and that the matrix has a significant storage capacity for VOCs, which will slowly diffuse back out of the matrix and will serve as a long-term VOC source to ground water (Sections 3.2.2 and 4.3.1.4); and
- the low mean hydraulic conductivity of the bedrock (Section 3.4.2).

A TI waiver is justified based on the Site conditions that were extensively characterized during the RI, and this outcome is consistent with the direction of the EPA Assistant Administrator and EPA's TI Guidance (1995). A TI waiver is also consistent with other EPA Region 1 decisions where TI waivers were granted for sites that are smaller in scale and less complex (hydrogeologically and chemically) than the ONOGU at the SRSNE Site. The following precedents are noteworthy in this regard:

- Durham Meadows (Durham, Connecticut) – The Durham Meadows Superfund Site consists of two former manufacturing facilities and a surrounding groundwater study area. EPA has proposed to implement a TI waiver at this site. In support of this waiver, EPA determined that DNAPL in till and fractured bedrock is not technically practicable to clean up in a reasonable time frame. Other aspects of the proposed remedy include: institutional controls, long-term groundwater monitoring and provision of an alternative water supply to affected and other residences in the contaminated area. Notably, the Proposed Plan for the Durham Meadows site states: “Limitations on the hydraulic accessibility of DNAPL, coupled with the low permeability of the till, make removal of DNAPL and restoration of groundwater to background levels within a reasonable time frame (e.g., less than 100 years) very unlikely. There are currently no available technologies that are known to be effective in restoring DNAPL zones in heterogeneous geologic environments to drinking water quality in a reasonable time frame.”
- O'Connor Co. (Augusta, Maine) – This site was the location of former transformer salvaging processes. Contaminants include oil containing PCBs. A 2002 ROD Amendment changed the remedy originally selected in the 1989 ROD. The major components of the remedy specified in the 2002 ROD Amendment include: institutional controls to prevent the use of contaminated

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groundwater, waiver of federal and state drinking water standards in groundwater based on technical impracticability, recovery of separate phase oil, long-term monitoring of site groundwater, and a review of the site every five years. The TI Zone includes overburden and bedrock. (EPA initially had proposed an innovative remedy at this site.)

- Loring Air Force Base (AFB), OU-12, Entomology Shop and Jet Engine Build-Up Shop (Limestone, Maine) – A TI waiver was granted for groundwater ARARs due to the influence of matrix diffusion in bedrock as part of the September 1999 ROD. The TI Zone includes “a ‘buffer zone’ to allow for variability of the fractured rock system.” The plume is contained by natural groundwater discharge to an on-site drainage ditch, with no active groundwater extraction or treatment to contain the source area.
- Loring Air Force Base (AFB), OU-12, Quarry Site (Limestone, Maine) – A TI waiver was granted for groundwater ARARs due to the suspected presence of DNAPL in this area of Loring AFB and the impact of matrix diffusion in bedrock as part of the September 1999 ROD. This TI Zone also includes “a ‘buffer zone’ to allow for variability of the fractured rock system.” The plume is contained by natural groundwater discharge to a wetland and brook, with no active groundwater extraction or treatment to contain the source area. The discharge areas are both on-site and off-site, and the TI Zone extends off-site. As part of the remedial agreement, the Air Force agreed to budget \$250,000 for “DNAPL reduction” research.
- Hocomonco Pond Superfund Site (Westborough, Massachusetts) – A dissolved plume of VOCs and polycyclic aromatic hydrocarbons (PAHs) emanates from an overburden DNAPL (creosote) zone and is controlled by natural discharge to an adjacent, on-site pond. EPA granted a post-ROD TI waiver in 1999 by issuing an ESD, requiring only DNAPL extraction (when found in existing wells), and sediment and groundwater monitoring.
- Pease Air Force Base (Portsmouth/Newington, New Hampshire) – In 1995, EPA granted TI waivers for several of the federal and state chemical-specific ARARs for overburden and bedrock source area groundwater, stating that the “source area is unlikely to be successfully remediated because of its relatively complex hydrogeology and the suspected existence of DNAPL...and the portion of the dissolved-phase contaminant plume which does not meet [ARARs]...can be hydraulically contained by the vertical barrier and groundwater extraction system.”

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- Pinette's Salvage Yard Superfund Site (Washburn, Maine) – EPA granted a front-end TI waiver from compliance with the State of Maine Maximum Exposure Guideline for PCBs due to the difficulty of collecting and treating “particulate-bound PCBs” in overburden groundwater. A 1993 ROD Amendment and 1996 Explanation of Significant Differences continued to support the TI waiver decision. The groundwater remedy included groundwater extraction and treatment to manage migration of the plume, which also included VOCs.
- Sullivan's Ledge (New Bedford, Massachusetts) – EPA granted a TI waiver in the 1989 ROD, stating: “EPA is waiving compliance with certain ARARs relating to groundwater. The waiver covers both federal and state ARARs... The determination of technical impracticability is based primarily on the nature of the wastes and contaminants within the pits and along the bedrock fractures, and the geology of the site. EPA concluded that the quarry pits and bedrock fractures contain dense non-aqueous phase liquids (DNAPLs). The bedrock fractures are irregular both in length and orientation and as such cannot be accurately located, especially at such depths...” The remedy included a pump and treat system to address the dissolved phase plume.
- Tansitor Electronics, Inc. (Bennington, Vermont) – This site was a manufacturing facility for electronic capacitors. Organic solvents and acids had been disposed of on-site between 1956 and 1979. The site is underlain by approximately 35 feet of ablation till, overlying a 15-foot silty sand basal till. EPA waived groundwater ARARs because: 1) “the overburden soils in the area of the contaminated plumes have low hydraulic conductivity”; 2) “the concentrations of certain dissolved contaminants in the groundwater are extremely high”; 3) “the most frequently detected contaminants at the Site tend to adhere to soil particles”; and 4) “computer modeling indicated that an extended period of time would be required to achieve drinking water standards through either natural attenuation or extraction and treatment of the groundwater.”
- South Municipal Water Supply (Peterborough, New Hampshire) – A TI waiver was granted for groundwater ARARs due to the presence of DNAPLs in overburden and bedrock, and a restoration timeframe to restoration estimated as 108 years. Note that the “partial DNAPL mass removal” approach using vapor extraction was abandoned once EPA determined that restoration to drinking water quality was impracticable.

In 2005, the National Research Council for the National Academies issued a report entitled “Source Zone Assessment and Remediation”, which reached the following conclusions:

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“Though there is a significant lack of data and information upon which to make definitive statements about source remediation, the committee did present conclusions and recommendations regarding current technologies of source remediation.

- Available data from field studies do not demonstrate what effect source remediation is likely to have on water quality...
- Performance of most technologies is highly dependent on site heterogeneities...
- Most of the technologies are not applicable in, are negatively impacted by, or have not been adequately demonstrated in low-permeability or fractured materials...
- Each technology has the potential to produce negative side effects that need to be accounted for in the design and implementation of that technology ...
- Development of treatment technologies for explosives source zones is in its infancy because the characterization of explosive source materials and of their interactions with geologic media lags far behind the knowledge base that exists for DNAPLS...

Regarding costs, the committee found that, although anecdotal cost data are available for some source remediation technologies, (particularly surfactant flooding and thermal technologies), actual cleanup costs are highly dependent on site-specific hydrogeologic, geochemical, and contaminant conditions (NRC, 1997), such that absolute statements regarding the relative costs of different technologies are of limited utility.”

The remedy EPA proposes for the SRSNE Site is not consistent with conclusions reached by EPA’s Expert Panel, the National Research Council, or the remedies selected or proposed by EPA at multiple other Superfund Sites in New England, including those summarized above. These inconsistencies are especially highlighted by EPA’s recent actions and associated statements or justifications at two other New England Sites. The first is the Durham Meadows Site in Durham, Connecticut which is another site with chlorinated solvent NAPL in glacial till overburden and in fractured bedrock (similar to SRSNE). The TI Evaluation for Durham Meadows which supports the TI waiver proposed for that Site by EPA (EPA, July 2005) cites EPA’s Expert Panel Report titled “*The DNAPL Remediation Challenge: Is there a Case for Source Depletion*” [USEPA 2003], noting:

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“If the RAO in the source zone is complete restoration, or MCLs, it is unlikely that any of the technologies currently available will be successful, except in situations involving small spills of DNAPL in relatively homogeneous saturated zones”.

The FS and TI Evaluation for the Durham Meadows Site were prepared by an EPA contractor, under EPA’s direction. Section 3.3.1 of the TI Evaluation states:

“An approach based on converging lines of evidence, outlined in *An Illustrated Handbook of DNAPL Transport and Fate in the Subsurface* (the DNAPL Handbook), published by the Environmental Agency, Bristol, England in 2003 (Kueper et al, 2003) was used for the DNAPL assessment. As stated in the handbook, DNAPL presence is often established on the basis of converging lines of evidence rather than direct visual observation...Using the methodology in the above- stated handbook, “potential” and “probable” DNAPL zones were interpreted. The potential DNAPL zone is considered the conceptual maximum extent of DNAPL in the subsurface.”

This is precisely the approach used at the SRSNE Site as outlined in the 1995 RI Work Plan, and detailed in the 1998 Remedial Investigation Report, and 1998 and 2000 draft TI Evaluations. In 2003, EPA directed a change in the approach to NAPL delineation at SRSNE, when it decided to implement a standard of “visual observation” as the basis for delineation, instead of the previously approved standard of converging lines of evidence. This is significant because Dr. Kueper utilized the DNAPL delineation approach developed and applied from 1995-1998 at the SRSNE Site as the basis for the 2003 DNAPL Handbook, which, in turn, was used by EPA in the 2005 DNAPL delineation and TI Evaluation for the Durham Meadows Site. In 2005, therefore, EPA used the very same approach to justify a TI waiver for the Durham Meadows Site that EPA had rejected at SRSNE in 2003. Such a glaring inconsistency highlights the arbitrary and capricious nature of EPA’s remedy selection for this Site.

At Durham Meadows, EPA properly concluded that “There are currently no available technologies that are known to be effective in restoring DNAPL zones in heterogeneous geologic environments to drinking water quality in a reasonable time frame.” In contrast (and with remarkable inconsistency) at SRSNE EPA concluded that a mixture of thermal treatment and MNA could achieve “groundwater clean up levels” and “attain ARARs,” even recognizing that those goals can only be achieved “after a very long time.”

The FS for Durham Meadows evaluated potential remedial technologies, including thermal treatment. Unlike at SRSNE, thermal treatment was screened out, with a simple table entry stating “Screened Out: Not as effective due to volatilization concerns

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to nearby inhalation receptors.” This determination was likely based on the fact that heating volatile organic contaminants in the subsurface necessitates the operation and maintenance of a reliable vapor extraction system in order to contain the volatilized chemicals. However, even well engineered and maintained vapor extraction equipment and systems are prone to mechanical failures which can result in release of volatile organic compounds into the ambient air above the treatment zone. One example of such failure occurred at the Silresim Site in Lowell, Massachusetts during the pilot test of electrical resistance heating (ERH) in October 2002-January 2003. The Silresim Site pilot test covered an area 1% of the size of the ONOGU at the SRSNE Site. Even with a small, pilot scale treatment system, an experienced ERH vendor encountered significant problems with releases of volatile organics into the air. EPA’s project manager characterized the atmospheric release of steam and vapor due to excessive heat, pressure, and chemical attack on equipment as a “significant setback”. The increased likelihood and potential magnitude and severity of an atmospheric release of steam and vapor over an area 100 times larger than the Silresim Site pilot test (the SRSNE Site ONOGU) must be factored into the evaluation of short-term risks posed by EPA’s thermal remedial approach selected for SRSNE. This issue is made all the more acute at the SRSNE Site due to the repeatedly expressed concerns voiced by the Site’s neighbors and other Southington residents that the remedy avoid the creation of air emissions.

Like SRSNE, Silresim is contaminated by VOCs, with DNAPL being present in saturated overburden. At the Silresim Site, EPA performed a pilot study of thermal treatment that removed more than 97% of VOCs, but failed to achieve sufficient removal to meet “risk based clean up goals” established for that Site. The second five-year review at Silresim concluded that, even with application of thermal treatment, achieving clean up goals would take longer than 30-years. Given this conclusion, EPA apparently decided not to implement thermal treatment at Silresim to effect partial DNAPL mass removal, and instead has elected to maintain the existing cap, long-term groundwater treatment and institutional controls for the foreseeable future. EPA has determined that this alternative approach, not including full-scale thermal treatment, is “protective” for the Silresim Site. In contrast, at the SRSNE Site, EPA has determined that proceeding with an aggressive, even more risky and expensive thermal treatment technology to achieve partial mass removal is justifiable, despite acknowledging that clean-up to applicable groundwater standards will still take well over 100 years. This approach is certainly not consistent with the Silresim precedent and with EPA’s determination at the Silresim Site of what constitutes a “protective remedy.”

Although EPA inexplicably reversed its position regarding the applicability of TI for the SRSNE Site in 2001, after 6+ years of TI documentation, data collection and analysis by the Group, the Group continues to believe that the SRSNE Site is suitable for a TI determination. An extensive review of other sites supports the Group’s belief that

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efforts to remediate large NAPL zones have not attained groundwater ARARs at **any** site. Moreover, the SRSNE source area would certainly be among the largest and most complex NAPL zones to implement aggressive source zone remedial technologies, if EPA pursues the approach to the Site set forth in its Proposed Plan.

C.3. Contamination found in Town Wells No. 4 and No. 6 is the result of sources from other nearby sites, making these wells unlikely to be used in the future, regardless of the SRSNE remedy

Over the years there have been serious misconceptions expressed regarding the sources of VOC contamination that have affected Town Wells No. 4 and No. 6. This is significant in light of comments made at the June 8, 2005 SRSNE Site Public Hearing, and in follow-up statements to the press by Mr. Edward Pocock III, the President of the Southington Board of Water Commissioners. At the hearing, Mr. Pocock expressed his concern that the remedy outlined in the Proposed Plan for the SRSNE Site “does not provide compensation for the loss of the town wells.” Accordingly, the Group wishes to address this issue in these comments.

One source of erroneous conclusions regarding the impacts to the Town wells was the Preliminary Ground Water Use and Value Determination submitted to EPA by CTDEP on October 3, 1997. The most egregious error in that document was the conclusion that “The contamination in Well 6 has been directly linked to the SRS Site, while a portion of the contamination in Well 4 is believed to be from the SRS Site.” This conclusion is not supported by either historical or current ground-water quality data, or by CTDEP’s own earlier analysis. The inaccuracies in CTDEP’s October, 1997 analysis is addressed in the Group’s October 26, 1998 comments on the Preliminary Ground Water Use and Value Determination, included as Appendix B to the November 1998, June 2000, and June 2004 draft FS reports. As detailed in the Group’s comments, both available historical and recent groundwater data continue to support the conclusion that CTDEP reached in October 1978, specifically that: “The greatest threat to well No. 6 at this time is the contaminated area southwest of well No. 4 on the other side of the Quinnipiac River.” This conclusion was echoed in a January 1979 CTDEP memorandum that states “The conclusions which have been drawn from the data, most of which we obtained from the [town’s] consultant, is that Well No. 4 is the more severely polluted well and the source of the contamination, although unknown, is not on the Solvents Recovery property” (see CTDEP Memorandum of January 11, 1979 from Robert Taylor, Director of Water Compliance to Melvin Schneidmeyer, Deputy Commissioner).

It is important to note that in the 1980’s, CTDEP issued at least four enforcement orders to “investigate and remediate the source of VOC contamination in soil and groundwater” to owners of property located south and south-east of Town Well No. 4. Groundwater and soil data obtained in 1981 in response to CTDEP Order No. 3045 of May 15, 1981

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at the former Ideal Forging facility (now Northeastern Shaped Wire) located at 411 North Main Street, (800' south-east of Town Well No. 4), indicated that DNAPL was likely present at that site. A review of CTDEP's files further reveals that on May 2, 2002, the owner of that property submitted to CTDEP a "Groundwater/Non-Aqueous Phase Liquid Extraction Workplan." Review of data submitted with that Workplan makes it clear that the presence of DNAPL has been confirmed at the Ideal Forging Site; that up to that date, CTDEP had not required delineation of the nature and extent of off-site contamination associated with that site; and that the VOCs on the Ideal Forging property had not yet been remediated. To our knowledge, CTDEP has not followed up regarding the other 1980's era enforcement orders (see CTDEP Order No. 2672 of February 11, 1980 to Casimer and Joseph Wygonowski regarding 45 Curtiss Street; CTDEP Order No. 2673 of February 11, 1980 to Southington Form Construction regarding 45 Curtiss Street; and CTDEP Order No. 3418 of January 31, 1983 to Josephine Vojtila regarding contamination at the intersection of Darling and Main Street); leaving the nature and extent of other sources of contamination to Town Wells No. 4 and No. 6 (aside from the Ideal Forging property) unknown.

These issues led the Group to fund the 1998 study of alternative water supplies for the Southington Water Department. Significantly, this study concluded that wellhead treatment would need to be designed and installed prior to reuse of either Town Well No. 4 or No. 6, due to the variety of nearby VOC source areas. Town residents, Water Board commissioners, and government regulators have acknowledged that the Town wells now closed because of contamination will never be reactivated, but that the wells remain "on the books", apparently in the hope that CTDEP will authorize alternative water supplies for Southington in exchange for the Water Department relinquishing its right to pump the closed wells.

At the June 30, 2005 Public Hearing on the SRSNE Proposed Plan, a resident (Mr. Sev Bovino) suggested that the groundwater should be reclassified and less stringent standards applied, to reduce the cost of the clean-up. Ms. Chris Lacas of CTDEP responded that CTDEP presumes that all waters of the State are potential sources of drinking water; therefore the groundwater would remain classified as GAA (i.e., a potential drinking water source). CTDEP's presumption of future use drives the need to restore water quality to meet drinking water standards. The Group proposed exactly what Mr. Bovino suggested (reclassification of groundwater) in both the November 1998 and the June 2000 draft FS reports. However, in comments on the June 2000 draft FS, EPA and CTDEP directed the Group to "Eliminate reclassification as an option." The Group is aware of no legal or factual basis for this directive. Since Connecticut law requires that a petition for reclassification accompany a TI request, the Agency directive to eliminate consideration of reclassification would effectively and unjustifiably eliminate the TI option under CTDEP's regulations.

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Significantly, CTDEP does not consistently apply the policy explained by Ms. Lacas (i.e., that CT considers all waters of the State to be potential drinking water supplies), as demonstrated by another Superfund Site within the same town. At the Old Southington Landfill (OSL) Superfund Site, VOC contamination resulted in abandonment of Southington Town Well No. 5. As part of the remedial plan and in response to a petition by PRPs including the Town of Southington, CTDEP changed the classification of the water from GAA (drinking water) to GB (non-drinking water). A subsequent petition from the OSL Site PRPs in 2004 resulted in CTDEP expanding the size of the GB area after delineation of the VOC-plume related to the landfill found VOCs above drinking water quality in groundwater outside the originally designated GB area. For State and Federal action to be other than arbitrary and capricious, the same approach must be applied at the SRSNE Site.

Moreover, maintaining Town Wells No. 4 and No. 6 as an “official public water supply”, with the related groundwater classification and Quinnipiac River diversion rights is a fiction that misleads the public, since it is exceedingly unlikely that Town residents will ever consent to the use of these wells again as a public water supply. Therefore, groundwater at SRSNE should be reclassified as GB to acknowledge the reality that it will not be used as a drinking water source, as was done at the nearby OSL Site.

C.4. If EPA determines that partial mass removal is necessary, the current record supports the selection of Hydraulic Displacement and Enhanced In-Situ Bioremediation

Based on the extensive technical analysis documented in its 2004 draft FS, the Group believes that, if notwithstanding the above considerations relevant to the appropriateness of a TI Waiver, EPA mandates that partial NAPL mass removal is required at the SRSNE Site, hydraulic displacement (HD) followed by enhanced in-situ biodegradation (EISB) is the preferable remedial alternative for the ONOGU. In combination, these technologies comprise the fastest and most aggressive NAPL remedial option that can be safely and reliably implemented at this Site, without significantly increasing short-term risk of downward NAPL mobilization or health-based risks.

HD involves the pumping of groundwater to enhance the groundwater hydraulic gradient through the overburden area containing NAPL so that the mobilizable NAPL accumulations (“pools”) are drawn to extraction wells, where NAPL is removed from the subsurface. HD provides direct removal of NAPL in a manner that is less likely to cause inadvertent, undesired movement of additional NAPL downward into the bedrock. Any NAPL remaining in the subsurface following HD would be immobile. In addition to reducing mass and eliminating NAPL mobility, the HD technology has two additional benefits. First, it will lead to an increase in NAPL–water interfacial area available for

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mass transfer. Thus, hydraulic displacement would be a beneficial means of pre-conditioning the treatment zone prior to the subsequent application of EISB. EISB would then significantly enhance the rate of dissolution and degradation of the remaining NAPL. Second, as HD does not require heating and vaporizing the NAPL to extract it from the ground, HD does not require complex vapor handling and treatment equipment and does not entail the significant risk of VOC vapor releases to the air.

HD is a reliable technology that can be viewed as a form of pump-and-treat, already successfully implemented at the Site by the Group since 1995. HD does not involve phase changes in the subsurface, does not rely on mass transfer (but does enhance it, as mentioned above), does not utilize chemical injection, and does not require a complicated fluids treatment system. There is considerable experience within the contaminant hydrogeology community and at the SRSNE site with respect to the installation of groundwater recovery wells, and the operation of pumping systems. As a result of these factors, full-scale hydraulic displacement can be implemented at the SRSNE Site expeditiously without a field-scale pilot test. The same cannot be stated for in-situ thermal technologies, which clearly require pilot testing to support an effectiveness evaluation and, if successful, full-scale design.

The risk of vertical pool mobilization from HD implementation is minimal given the fact that hydraulic displacement is a 'depleting' technology that does not involve the build up of NAPL banks. Thermal remedies carry greater risk of mobilizing NAPL downward, because cool areas surrounding or within the heated zone can cause volatilized DNAPL to re-condense. These areas, enriched with DNAPL, pose risk of pushing additional DNAPL downward into the bedrock. This is not a risk with HD because the physical factors do not develop during the HD process.

EPA appears to have completely ignored another consideration in technology selection: that is the relative use of natural resources. Thermal technologies utilize significant amounts of electrical power to heat the subsurface and to run vacuum pumps to extract contaminated vapors, and significant amounts of natural gas to fuel "thermal oxidizers" to incinerate extracted vapors. In total, thermal remediation would utilize approximately as much energy as would be used by 910 households in one year. In contrast, HD utilizes electrical power to run pumps used to extract groundwater and NAPL, and lesser amounts of natural gas for vapor treatment. In total, HD would utilize the same amount of power as would be used by about 165 households in one year. Employing estimates of energy usage for the various ONOGU alternatives, the Group estimated the greenhouse gases that would be emitted under each alternative. The attached Table 4-64 summarizes this information. Surprisingly in light of the serious concerns surrounding climate change and the ongoing shortage of electrical generation capacity in Connecticut, this information was eliminated from the FS by EPA.

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As previously discussed, the outcome for groundwater quality is the same regardless of whether HD/EISB or EPA's thermal remedial approach is employed at the Site. After decades of efforts to remediate NAPL source zones, it is clear that the most challenging source zones, such as the ONOGU at the SRSNE Site, cannot be reliably remediated to groundwater ARARs within a reasonable time frame. Therefore, applying either remedial technology, the groundwater within the ONOGU will remain above MCLs for the foreseeable future, well beyond the time period EPA has considered as "reasonable" at any other site.

C.5. Compliance with the NCP requires that a cost-benefit analysis of partial NAPL mass removal be performed

As noted above, the potential benefits and costs of partial NAPL mass removal is an area of active research. In comparison to the costs for HD, the costs of thermal remediation vary widely and cannot be reliably predicted without a detailed pilot test. Although unit costs may decrease during larger full-scale thermal applications, the degree to which a selected pilot test area matches the physical and chemical characteristics of the remaining sources area is unknown. Thus, even a pilot test may leave significant uncertainty regarding the cost of full-scale application. Based on a detailed review of publicly available literature and discussions with thermal treatment vendors regarding thermal remediation sites, the costs of thermal treatment have ranged from \$41 to \$1,300 per cubic yard. Even at an individual site, the cost for remediation on a unit volume basis can vary depending on the calculation process. For example, at a full-scale electrical resistance heating (ERH) site in Skokie, Illinois, the cost has been reported by EPA to be \$41/cy of heated soil; however, based on actual source zone dimensions, we have calculated a cost of \$220/cy of source zone. The lower unit cost number cannot be applied to other sites, because the heated zone cannot be precisely tailored to a target zone proposed for treatment.

One approach used by EPA is illustrated in the "Streamlined Remediation System Evaluation" or "RSE-lite" process conducted in August 2004 for the Cape Fear Wood Preserving Site in Fayetteville, NC. The RSE-lite team was made up of EPA personnel and EPA contractors. The Cape Fear Site is a "Fund lead" site, with confirmed DNAPL (creosote) in overburden and existing hydraulic containment of contaminated groundwater (so, with the exception of the source of funding and the type of NAPL, the site is similar to SRSNE). At the SRSNE Site, a pilot study of thermal treatment will be required if EPA does not modify its proposed ONOGU remedy as requested in these comments. Pertinent to such an SRSNE evaluation process of a thermal remedy for the ONOGU, the RSE-lite study at Cape Fear states:

"It is understood that over the long-term, the State would likely benefit financially if more aggressive remediation were conducted during Long-Term Response

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Activities. However, it is unclear if a full-scale thermal remedy will allow pump and treat to be discontinued or that an estimated cost of \$8 million to \$10 million or higher would be a viable upfront investment for EPA at this site. If funding is available for a large upfront investment, the RSE-lite team suggests that a full-scale thermal remedy might be cost-effective to EPA if it could be conducted for a guaranteed price of \$9 million [note that the RSE-lite team estimated the future cost of long term pump and treat to be \$9 million], and there is a guarantee that active remediation would not be required upon completion of thermal remediation...”

“If a guaranteed cost of approximately \$9 million is achievable, including financial assurance in case of a failed remedy and an insolvent thermal vendor, then the site team should determine the concentrations that need to be achieved by thermal remediation to obviate the need for further active remediation (i.e., continued pump and treat). These concentrations would be an important factor for a thermal contractor to know before offering a guarantee on the thermal remedy performance. The site team might use ground water flow and transport modeling to help determine these target concentrations, but such an evaluation should not be conducted unless it is clearly proven that quality full-scale thermal remedy can be conducted for guaranteed cost of \$9 million or less.”

In contrast to EPA's approach at the Cape Fear Site, where thermal treatment is only expected to be implemented if it can be shown to offset equivalent long-term treatment costs (by eliminating the need for future groundwater containment and treatment), thermal treatment at SRSNE will be in addition to long-term groundwater treatment, not only achieving zero cost savings, but substantially increasing overall Site remedial costs.

C.6. Any Thermal Remedy Selected for the Site Requires a Pilot Test

If EPA remains determined to proceed with a thermal remedy for the SRSNE Site, then a pilot study of the technology must be performed prior to proceeding with full scale remediation. A pilot study is necessary to evaluate the following issues:

1. Minimization of downward NAPL mobilization

Specifically, well design and installation approaches need and to be established to minimize the potential for downward migration during construction; then system operation approaches need to be evaluated to minimize the potential for downward migration during operation. In addition, EPA has suggested that a “hot floor” might be utilized to control the downward migration of NAPL. If such an approach is to be utilized at SRSNE, it would be the first application of its type. Therefore, it must be carefully

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evaluated to determine whether it is appropriate and, if so, how to design and how best to apply it.

2. Air emissions permitting, monitoring, and controls

Volatilizing and removing an estimated 1,000,000 pounds of VOC NAPL from the SRSNE Site would represent the largest quantity of solvent to date for which thermal remediation has been attempted. The specific requirements and duration of review necessary by CTDEP to satisfy the CERCLA "permit equivalency" process are not currently known. The means by which CTDEP will require a demonstration that satisfactory treatment of vapors is being achieved is not known. Monitoring requirements during treatment are also not known.

3. Materials for wells, piping, etc.

Thermal treatment failed at the Rocky Mountain Arsenal Site due to intense corrosion of piping, caused by hydrochloric acid generated during decomposition of chlorinated solvents. Several piping failures also occurred during the pilot study at the Silresim Site that resulted in uncontrolled releases to the atmosphere. These issues must be evaluated at pilot scale prior to expending the resources to construct a full-scale system – which could then require substantial modification in the event that similar issues arise at the SRSNE Site.

4. Performance Metrics and Measures of "Success"

EPA stated in its Proposed Plan that the objective of thermal treatment is "to reduce VOC concentrations to levels that are not indicative of the presence of pooled or residual NAPL." How accomplishing that goal would be evaluated or measured, or what risk reduction would be achieved if the goal was met, remain undefined. It is simply not reasonable to expect the Group to expend an estimated \$17.7 million on a project that lacks defined goals, particularly considering EPA's varying approaches to the Site over the past ten years. A pilot study would provide the opportunity to establish and evaluate meaningful and measurable performance goals for thermal treatment, and to modify those goals, if necessary, based on the real-world experience gained during the pilot study.

5. Cost

As discussed above in Section B.6, the cost to implement thermal treatment at SRSNE cannot be estimated reliably based on the costs for treatment at other sites. Significant uncertainties exist with respect to vapor treatment needs, materials of construction, and performance goals. Some or all of those uncertainties may be accommodated in

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“contingencies” incorporated into the FS cost estimates. However, other costs, such as the treatment of extracted groundwater and condensed vapor, or the design and implementation of a “hot floor” are not accounted for in current estimates. A pilot study is necessary to evaluate the specific application of thermal treatment at SRSNE. It is believed that such a pilot test, coupled with establishment of meaningful performance goals, will also allow thermal vendors to guarantee firm, fixed remedial costs.

7. Acceptance of air emissions/equipment by public.

As discussed above in Sections C.1 and C.2, the public in Southington has consistently expressed its desire that treatment at SRSNE not result in air emissions. Vapor treatment during thermal treatment will require thermal oxidation, cooling of vapors, and acid-gas scrubbing. The result will be a highly visible presence of vapor treatment and air discharge equipment at the Site. Even if the anticipated CTDEP air treatment requirements are met, treatment of 1,000,000 pounds of VOCs could result in emission of 3,000 pounds of VOCs during the 200 days of treatment. Since EPA has so far failed to inform the public regarding the realities of the thermal remedy it proposes, a pilot study will be the first real test of public acceptance of the proposed remedy.

8. Thermal should only be considered for full-scale after success at pilot scale.

The Group recognizes that EPA has proposed thermal treatment, without establishing a contingent remedial approach and without focusing on the multiple issues that remain to be addressed during design and implementation. Full-scale thermal treatment should only be considered after the above issues #1 to #7 are fully addressed, and after a successful pilot test is completed. In addition, the costs to implement full-scale treatment must be evaluated to ensure they comport with the May 2005 FS estimates, based on which EPA selected thermal treatment.

C.7. EPA's Cost Estimates in the FS and Proposed Plan are Misleading and are unsupported by the record

EPA's Proposed Plan misrepresents the estimated costs of the remedy being proposed. During preparation of the June 2004 draft FS, EPA confirmed to the Group that the FS analysis should utilize the discount rate directed by the federal Office of Management and Budget (OMB) for cost benefit analysis. This rate is adjusted annually, and in 2003, EPA agreed that the then current rate of 3.5% should be used. Surprisingly, in 2005, EPA changed its former position that the OMB discount rate was to be used and instead directed use of a 7% discount rate for analysis of O&M costs projected to occur over a 30-year period. This 7% discount rate is in contrast to the current (2005) OMB directed discount rate of 3.1%. EPA's inappropriate and unsupported use of the higher and economically unrealistic 7% discount rate effectively reduced the projections of long-

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term O&M costs by 50%. If the Group funded the actual work based on a 7% discount rate, the result would be insufficient assets to perform the work over time.

EPA's estimated total project cost at the 7% rate is \$29,260,000. If the current OMB rate of 3.1% is used, the total cost grows to \$34,780,000. Thus, EPA's use of the higher discount rate results in a significant underestimation of the actual cost of the remedy. While EPA justifies use of a 7% discount rate based on its outdated "guidance", the use of such a rate is contrary to OMB direction to all US government agencies, and its own actions at other sites. Note that the RSR-lite team review at the Cape Fear Site used "a conservative discount rate of 3%" for evaluation of long-term costs. EPA's direction to use a higher discount rate enabled EPA to avoid an internal review process (the National Remedy Review Board) that is mandated where overall remedy cost exceeds \$30 million. As a result of the financial sleight of hand, EPA has misinformed the public as to the true cost of the proposed remedy.

D. Proposed Resolution of Issues

D.1. Provide a complete administrative record

The Group reviewed all of the documentation provided to EPA over the course of the RI/FS process, and on July 25, 2005, submitted to EPA key documents that it believed must be incorporated into the administrative record in order to provide a reasonably complete, contemporaneous description of EPA's remedy selection process. However, in the interest of efficiency, the Group did not provide every document submitted during the FS process. The attached table summarizes the documents that EPA provided in the administrative record released along with the Proposed Plan, the documents submitted by the Group on July 25, 2005, and the remainder of documents generated during the RI/FS. At a minimum, EPA should add the documents identified by the Group in its July 25, 2005 letter to supplement the seriously inadequate and incomplete record.

D.2. Reclassify the groundwater

As discussed in Section C.3. above, the Group believes that the Town, CTDEP and EPA should recognize the reality of the situation with respect to the Town Well Field, and that CTDEP should accommodate the use of alternative supplies by the Town, which would lead to abandonment of Wells 4 and 6 and their registered diversions. This approach would then allow reclassification of this area to GB, consistent with CTDEP's approach at the Old Southington Landfill Site.

D.3. Make a TI determination for the NAPL zone

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As discussed in Sections C.1. and C.2. above, making a determination that restoration of groundwater to ARARs is technically impracticable is appropriate, and would be consistent with EPA's approach at far less contaminated Superfund Sites in the Region.

D.4. Reconsider the NAPL zone remedy

As discussed in Section C.1. above, EPA has not consistently required partial NAPL mass removal at other sites. The Group does not believe that removal of NAPL for the sake of "rapid mass removal" is justified by NCP criteria, nor will it accomplish a useful or valid remedial objective. Indeed, the Group is convinced that such removal fails to solve the problems at the SRSNE Site, and likewise fails to change the need for or costs associated with groundwater remediation. Moreover, thermal treatment entails risks and costs disproportionate to its potential benefits. The extra risks, costs and complexity (including the possibility for remedy failure) associated with thermal treatment are disproportionate to the decrease in actual Site risks, because at the completion of thermal treatment, there would still be the need to cap the Site and implement institutional controls, hydraulic containment and up to 200 years of monitoring. Thus, the Group requests that EPA reconsider its selection of a thermal remedy. The Group believes that a TI determination, groundwater reclassification, continued groundwater containment and capping of the Operations Area at the Site will provide the most appropriate, protective remedy in compliance with CERCLA and the NCP.

However, if EPA concludes that active remediation is required for NAPL in the ONOGU, then based upon the extensive and well documented analysis in the 2004 FS report that the Group submitted to EPA, the Group believes that the HD + EISB alternative provides an appropriate balance of risk reduction and cost, because it is:

1. Equally effective in achieving the remedial action objectives (RAOs)
2. Less complex, easier and faster to implement (the CTDEP air emissions "permit equivalency" process for thermal treatment is likely to be lengthy and difficult)
3. Poses significantly lower risks than thermal treatment (far fewer potential air emissions and far less risk of release than with thermal treatment)
4. More likely to gain public acceptance (due to substantially lower air emissions and lower potential for unacceptable noise and/or odors than the thermal option)
5. Finally, while the total excavation and off-site disposal remedy was reviewed, it has higher risks to the community (>4,000 truckloads of contaminated soil moving through

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Town), and of release of NAPL to the bedrock (due to gravity drainage of liquids from soils to the excavation bottom)

D.5. If notwithstanding the above considerations, a thermal remedy is selected by EPA, then a pilot study will be necessary to address key concerns and uncertainties

If EPA remains determined to proceed with a thermal remedy for the SRSNE Site, then, as discussed in detail in Section C.6, of these comments, a pilot study must be performed prior to determining whether full-scale thermal remediation is appropriate at this Site.

D.6. Allow for meaningful public participation after the pilot test should thermal treatment be selected

As illustrated above, the remedy selection process for the SRSNE Site deprived the public of any meaningful opportunity to participate or comment. While the Group is sensitive to EPA's schedule, it should not be asked to assume added costs to address public concerns which should have been appropriately accommodated during the remedy selection process. EPA should provide an opportunity for meaningful comments during and after any thermal pilot test. In addition, the public participation requirements of CERCLA and the NCP require that EPA clearly explain its decision making process at SRSNE, and why it consistently has reached such dramatically different decisions at other sites having similar conditions.

E. Questions to be Answered by EPA

In addition to responding to the issues and concerns raised in these comments, the PRP Group requests that EPA consider and respond to the following specific questions, which are based on the comments and concerns expressed above.

Question #1 – What is the rationale for EPA's various determinations of what is a "reasonable" time in which to achieve restoration to ARARs at different sites within Region 1?

Question #2 – What is EPA's justification for departing from the Agency's policy in favor of TI waivers at DNAPL sites at the SRSNE Site, while granting TI waivers for other sites (as noted above in Section C.2) which have conditions that provide less support for such a waiver than those conditions documented to be present at SRSNE?

Question #3 – EPA's initial approach to the SRSNE Site, as documented in the 1995 RI/FS SOW, was that a TI determination was in fact appropriate for the Site. What

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facts, analysis, or other information supports EPA's current position that a TI waiver is not appropriate for SRSNE?

Question #4 – Considering that long-term groundwater institutional controls, containment, treatment and monitoring is expected to be necessary, even with the application of thermal treatment in the ONUGU, what “significant reduction in current or future risk” (as stated in the TI Guidance) does EPA expect to achieve by the incremental mass removal afforded by thermal treatment over Hydraulic Displacement and Enhanced In-Situ Bioremediation?

Question #5 - On what basis did EPA change its mind between November 2004 and June 2005 that a “hot floor” may be necessary at the SRSNE Site? What new information justifies that change in rationale?

Question #6 – What is the status of the efforts to investigate and remediate the other known sources of VOCs (other than SRSNE) that would affect the future use of Town Wells No. 4 and No. 6? When do EPA and CTDEP plan to provide the public and the Town Water Board with accurate information regarding the other known and identified uncontrolled sources?

Question #7 – Considering CTDEP’s statement to the public regarding its policy against reclassifying groundwater from GAA (drinking water) to GB (non-drinking water), why is the groundwater in the vicinity of the Old Southington Landfill not considered a future drinking water source? In other words, what is EPA’s and CTDEP’s rationale for accommodating reclassification of groundwater to GB at one site, but not another, similar site within the same Town?

Question #8 – On what basis did EPA conclude that groundwater as SRSNE will be restored to ARARs?

Question #9 - What specific analysis of the potential risks and benefits of partial DNAPL mass removal was conducted in support of EPA’s decision to propose use of thermal treatment at SRSNE?

Question #10 – What is the rationale for EPA’s different approaches to partial NAPL mass removal at sites with similar restoration time frames, i.e. requiring aggressive removal at SRSNE, while either eliminating this remedial option (South Municipal Water Supply) or not even considering it at other sites (Hocomonco Pond, Durham Meadows)?

Question #11 – Considering EPA’s experience at the Silresim Site, which seemingly informed EPA’s decision to screen out thermal treatment due to “inhalation concerns” at Durham Meadows, on what basis did EPA conclude that thermal treatment can be performed safely at SRSNE? Considering the known sensitivity of the Southington

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public to the potential for air emissions, how can EPA justify not informing the public of its experience at Silresim and contrary conclusions at Durham Meadows?

Question #12 – Why was the public not informed at the Public Meeting of other alternatives, such as Hydraulic Displacement + Enhanced In-Situ Bioremediation that would also achieve the ONOGU RAOs?

Question #13 – EPA's team at the Cape Fear Site recommended that thermal treatment not be considered unless it could be shown that an equivalent future remediation cost could be avoided. Why doesn't this approach to cost/benefit analysis apply to EPA's analysis of the use of thermal treatment at SRSNE?

Question #14 – Why does EPA not follow the direction of OMB, as required of all government agencies, with respect to current discount rates to be used for cost-benefit analysis?

Question #15 - After starting the RI/FS process with an active public communications program (see discussion in Section A.2 above), why did EPA subsequently fail to keep the public informed during the FS process from 1999 to 2005 and fail to add documents to the administrative record as required by CERCLA, the NCP and EPA guidance?

In closing, the Group does not suggest that EPA stop the current decision process, however, we do suggest that if EPA does select a thermal remedy, that full-scale implementation only occur after a successful pilot test. In addition, the Group believes that the opportunity for public comment on a thermal remedy must be reopened, at a minimum, after thermal pilot study results are available and the public has had an opportunity to understand those results.

Sincerely,



Bruce Thompson

cc: SRSNE Group
Mike Beskind, CTDEP
Marie Tuccitto, SAFE Group
Tom West, Southington Water Department

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Attachments:

- A) **Summary of Key Project Milestones**
- B) **Table of Energy Requirements and Associated Air Emissions**
- C) **Table of Documents Produced During the RI/FS Process**



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Attachment A

Attachment A – Summary of Key Project Milestones

Summary of NTCRA Work:

- In May 1995, during NTCRA construction, “Non-Aqueous Phase Liquids” or “NAPLs” were encountered while drilling a new well and while abandoning some existing wells.
- Starting in July 1995, the most significantly contaminated overburden groundwater has been successfully controlled by the NTCRA containment and treatment system. This system consists of a sheet-pile wall, 12 extraction wells, and a treatment system. The NTCRA system has consistently operated in compliance with the groundwater containment and treatment standards contained in the EPA Administrative Order on Consent.
- A “mitigation wetland” was designed and installed in 1995 to address the risk (which never materialized) that NTCRA pumping would impact small wetland areas.
- Public water was extended to three properties adjacent to the Site in 1997.
- A second, even larger zone of contaminated overburden and bedrock groundwater was contained starting in 1998 with the installation and start-up of the NTCRA 2 pumping system. Extracted NTCRA 2 water is treated in the NTCRA system. Groundwater in the Town Well Field downgradient of the NTCRA 1 and 2 systems now meets drinking water standards, due to the Group’s installation and operation of these systems.
- A full-scale phytoremediation study started in 1998, with the result that 1.5 acres of willow trees now reduce the amount of groundwater treatment needed during spring, summer, and fall months.
- The remaining Operations Area buildings, above, and below ground tanks, and other equipment abandoned by SRSNE was removed from the Site in 1999. As part of this work, septic tanks were pumped and closed, and the existing pavement was patched where needed to reduce the influence of precipitation and to eliminate a potential exposure pathway to site trespassers.
- In 2004, the Group established a clean area to serve as a parking lot to access a proposed northern extension of the town’s “rails-to-trails” program. This area is covered with clean fill excavated when constructing the adjacent mitigation wetlands.

Summary of Remedial Investigation/Feasibility Study Work:

In 1996, the Group took over the Remedial Investigation / Feasibility Study (RI/FS) process from EPA. To date, the Group has completed the following RI/FS work tasks.

- Prepared RI/FS work plans and completed field work leading up the 1997 (draft) and 1998 (final) RI Reports. Investigation activities by the Group and others have resulted in the installation of 305 overburden and bedrock monitoring wells within the 50-acre study area. Additional investigations occurred during the FS process, including further delineation of the extent of contamination in Cianci Property soils, whether sediment was contaminated in the adjacent Quinnipiac River, the extent of natural degradation, and whether a particular new VOC (1,4-dioxane) was present at the Site. Indeed, a study is in progress at this time to establish what level of naturally occurring inorganic groundwater contaminants will be considered representative of "background".

The draft Remedial Investigation Work Plan (RIWP) was submitted for EPA and CTDEP review on November 21, 1995. The RIWP outlined data requirements for a groundwater TI Evaluation in accordance with EPA's TI Guidance and as required by the RI/FS SOW. Appendix B to the RIWP was a 28 page analysis entitled "Identification, Preliminary Evaluation and Methods for Future Evaluation of Remedial Technologies within the Potential NAPL Zone." This appendix documented the Group's view that EPA should consider a TI Determination for the Site. The Group responded to EPA and CTDEP comments on the RIWP prior to its approval by EPA on August 15, 1996. EPA and CTDEP did not comment on or propose any changes to the TI-based approach recommended in Appendix B.

- The June 1998 final RI Report included as Appendix V, the "Development and Initial Screening of Remedial Alternatives Report." This report reflected the conclusion that TI was appropriate for the Site and that EPA should make a TI Determination, and accordingly concluded that remediation of NAPL would not need to be considered in the FS.
- On August 11, 1998, representatives of EPA, CTDEP, and the Group met to review the FS and TI Evaluation outlines, which the Group had prepared at EPA's request. The TI Evaluation followed the approach outlined in the RI Work Plan to delineate the likely extent of DNAPL contamination (i.e., using multiple lines of evidence, including multi-component "effective solubility" analysis of VOCs in groundwater to identify "probable" and "potential" NAPL zones in the soil and in the fractured bedrock). At the close of the meeting, EPA instructed the Group to prepare the FS and TI Evaluation pursuant to the outlines as modified at that meeting. Neither outline proposed further evaluation or pilot testing of NAPL mass removal technologies, nor did any EPA or CTDEP representative suggest such a change was appropriate. In fact, EPA regional and headquarters staff complemented the Group on the technical approach.

- In November 1998, the Group submitted the draft FS Report and TI Evaluation. Consistent with the approved outlines and earlier communications between the Group and EPA, the draft FS Report did not recommend treatability testing of new technologies in the NAPL zones. A 32-page attachment to the TI Evaluation entitled "Identification and Evaluation of Remedial Technologies for Restoration of Groundwater at the SRSNE Superfund Site" evaluated a number of potential technologies, concluding that none could restore ground water to drinking quality within a reasonable time.
- On March 12 and 16, 1999, EPA transmitted more than 50 pages of draft comments by EPA and CTDEP on the draft FS. Although a number of comments suggested that the FS might explore certain soil excavation options, EPA informed the Group at a March 30, 1999 meeting that EPA was not interested in a detailed review of large scale excavation alternatives.
- EPA comments on the draft FS of February 25, 2000 instructed the Group to "screen out" vadose zone soil excavation in the initial screening portion of the FS (leaving "no action" and capping options for soil). None of the comments proposed that the Group investigate or pilot test NAPL removal technologies. When it delivered the revised draft FS in June 2000, the Group understood that EPA was committed to the TI waiver approach which the Group had, by then, spent a great deal of effort refining pursuant to EPA directions.
- Responding to EPA and CTDEP comments on the November 1998 draft FS report and TI Evaluation entailed:
 - further field work to sample Cianci property soils (to satisfy CTDEP requirements);
 - sampling of Quinnipiac River sediment;
 - preparation of revised human health and ecological risk assessments, (supplementing previous versions prepared by EPA's contractor), that concluded that the most significant human health risks are associated with the potential current or future use of Site groundwater for drinking purposes,
 - preparation of a "Risk of Remediation" Analysis (which evaluates risks associated with either excavating and transporting for disposal off-Site or capping contaminated soils in the Operations Area, and concludes that risk to workers and residents would be much higher during excavation and transport than they would be with capping).

These studies supported the draft FS and TI Evaluation submitted in June 2000.

- EPA provided comments on the June 2000 draft FS in a January 10, 2001 comment letter. In a major change in direction, EPA required the FS be revised to include evaluation of technologies for in-situ mass reduction, specifically thermal technologies. EPA also announced in these comments that it felt "a pilot study of

thermal treatment would be appropriate.” The Group responded to EPA in a letter dated January 26, 2001 that sets forth the Group’s concerns regarding EPA’s sudden shift in approach to the Site. EPA responded in a letter of February 26, 2001.

- Negotiations over the next several years considered partial mass removal approaches, despite the fact that EPA agreed that no technologies could achieve ARARs. The Group suggested to EPA in 2003 that mobile NAPL in overburden posed the “principal threat risk” at the SRSNE Site; as such NAPL could potentially migrate. Further meetings focused on reaching consensus between the Group and EPA regarding NAPL zone Remedial Action Objectives (RAOs), definition of NAPL source zone volume, preparation of FS screening tables per the RI/FS guidance, and that the discount rate to be used for long-term (30 year) cost analysis would be 3.5% (the then current rate directed by Office of Management and Budget for use by all Federal analysis).
- In June 2003, the Group completed a NAPL zone groundwater sampling program. NAPL delineation field work was completed in November 2003.. Further negotiations between EPA and the Group attempted to define how successful NAPL treatment would be measured and how specific NAPL removal technologies might be evaluated, although no consensus was reached.
- Responding to EPA and CTDEP comments on the June 2000 draft FS and TI Evaluation entailed:
 - Further revisions in response to comments,
 - undertaking to negotiate a rationale for partial NAPL mass removal,
 - reaching an understanding with EPA that, regardless of the degree of partial mass removal from overburden, restoration of groundwater would take several hundred years, due to the effects of NAPL in the fractured rock at the site. EPA implied that several hundred years for restoration would be “reasonable” given Site conditions (note that an assumption that restoration is achievable within a reasonable time eliminates the need for a TI Evaluation and the necessity for EPA to waive groundwater ARARs).
 - conducting sampling and analysis to evaluate ongoing natural processes that are biodegrading VOCs,
 - conducting a field investigation to delineate a target NAPL volume for analysis in the FS, and
 - developing remedial alternatives for the “Observed NAPL in Overburden Groundwater Unit” or “ONOGU” media at the Site. This is the area where NAPL was directly observed in soil cores, and encompasses most of the former Operations Area at the Site. .

These studies supported the draft FS submitted in June 2004.

- On March 12, 2004, EPA directed the Group to prepare and submit the revised draft FS by June 25, 2004. The Group did so, resulting in a thorough technical analysis of remedial alternatives.
- On July 20, 2004, Group representatives made a day-long presentation of the FS to EPA and CTDEP representatives. EPA suggested that FS comments would be forthcoming by August 2004, and that finalization of the FS would occur by spring 2005, with a Proposed Plan targeted for release in May 2005, and a Record of Decision by September 2005.
- In August 2004, the Group was informed that EPA staff “was working on other priorities,” and that SRSNE FS comments would be forthcoming in the fall.
- In November 2004, EPA issued partial comments on the FS, focusing on thermal treatment of the ONOGU. Comments were received from regional staff, the EPA HQ thermal treatment technology proponent, the EPA Ada, OK lab thermal expert, and two thermal treatment contractors. Meetings between EPA and Group representatives occurred on November 17 and 18, 2004, to discuss the comments and approach to FS revisions. EPA directed the Group adopt a less conservative approach to thermal treatment (i.e., to eliminate certain design features in order to reduce the thermal treatment costs. These features included extending heating into the bedrock in order to create a “hot floor” to minimize the risks of downward NAPL migration.. EPA felt that this risk avoidance approach did not justify the increase in treatment costs, noting that “all approaches carried some risk of downward NAPL migration”. (Note that EPA reversed itself on this point when presenting thermal treatment to the public on June 8, 2005, at which time EPA stated that the thermal treatment design may include a “hot floor” notwithstanding EPA’s prior explicit direction to the PRP Group that a “hot floor” and its associated costs were not to be included in the FS).
- In December 2004, Group and Agency representatives met to discuss FS revisions. During these discussions, EPA informed the Group of the following:
 - that EPA would rewrite the draft FS and prepare a red-line/strikeout version of the FS text for the Group to review in order to finalize the FS as soon as possible. This approach is atypical, and, as discussed further below in Section C.4, is not in accordance with the provisions of the AOC. EPA did not provide an estimated date as to when they would provide their revision. The initial demand was for the Group to complete the FS by the end of January 2005, with EPA stating its’ intent to release a Proposed Plan by the end of February 2005 (Note that in July 2004, EPA said the release was scheduled for May 2005).

- EPA directed the Group to further update the June 2000 risk assessment update (all of the RAGs part D tables), based on toxicity data developed between June 2000 and the present.
- EPA directed the Group to include a vadose soil excavation and off-site disposal alternative (VS-3), notwithstanding EPA's February 25, 2000 commitment to screen out this alternative, and the continuation of this approach through all the screening tables jointly developed with EPA in 2003.
- EPA directed the Group to convert (i.e., delete and replace) the FS text analysis based screening of detailed remedial alternatives (about 65 pages of text) to a table based form (about 200 pages of new tables), reportedly to make the analysis easier for the public to understand.
- Other revisions to the FS between January and May 2005 incorporated EPA's directions regarding the discount rate to be used for long-term cost estimation and to modify Preliminary Remediation Goals.
- Responding to EPA and CTDEP comments on the June 2004 draft FS entailed preparing revised cost estimates, a revised evaluation of thermal treatment, a revised risk assessment (to meet new guidance issued between the June 2000 and June 2004 draft FS documents), and preparation of many pages of detailed analysis tables.

Throughout this process, the Group continued to request that EPA define measurable, achievable remedial goals for NAPL zone treatment, and how "success" in such treatment, if performed, would be defined. The Group's concerns were documented in letters to EPA of February 23, 2005 and March 7, 2005. At a meeting with EPA on March 16, 2005, EPA management committed to the Group that the Proposed Plan and *Record of Decision* would contain such measurable and achievable remedial goals.



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Attachment B

**Table 4-64
SRSNE Superfund Site
Feasibility Study**

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Energy Use and Pollutant Emissions from ONOGU Alternatives

Alternatives:	ONOGU-1	ONOGU-2	ONOGU-3	ONOGU-4	ONOGU-5	ONOGU-6
	No Action	Hydraulic Displacement and MNA	Hydraulic Displacement and EISB	Hydraulic Displacement, Chemical Oxidation and MNA	Thermal Treatment and MNA	Excavation and Offsite Disposal
Source of Utility Usage Estimate	Table 4-21	Table 4-24	Table 4-27	Table 4-30	Table 4-33	Table 4-36
Electrical Power Usage (KW Hrs)						
Hydraulic Displacement	0	500,000	500,000	500,000	0	100,000
Chemical Oxidation	0	0	0	32,000	0	0
Thermal Treatment	0	0	0	0	7,700,000	0
Ex-situ water treatment	0					100,000
Total	0	500,000	500,000	532,000	7,700,000	200,000
Natural Gas Usage (Therm or 100 ft3)						
Hydraulic Displacement	0	45,000	45,000	45,000	0	0
Chemical Oxidation	0	0	0	0	0	0
Thermal Treatment	0	0	0	0	80,000	0
Excavation	0	0	0	0	0	30,000
Total	0	45,000	45,000	45,000	80,000	30,000
Remediation Related Air Pollution Emissions						
Total Electric Power Used (KW-Hrs)	0	500,000	500,000	532,000	7,700,000	200,000
Total Natural Gas Used (Therms)	0	45,000	45,000	45,000	80,000	30,000
Conversion from Therms Nat. Gas to KW-Hrs (@ 29.31 KW-Hr/Therm)	0	1,318,950	1,318,950	1,318,950	2,344,800	879,300
Total Power Used (KW-Hr) (Electrical + Natural Gas)	0	1,818,950	1,818,950	1,850,950	10,044,800	1,079,300
Average Monthly Electrical Usage (assumes total power use distributed evenly over 12 months)	0	151,579	151,579	154,246	837,067	89,942
Air Pollutants Emitted by Natural Gas Combustion and Power Generation*						
Nitrogen Dioxides (NOx) (pounds)	0	2,979	2,979	3,031	16,448	1,767
Sulfur Dioxides (SOx) (pounds)	0	7,491	7,491	7,623	41,367	4,445
Carbon Dioxide (CO ₂) (pounds)	0	1,778,653	1,778,653	1,809,948	9,822,280	1,055,394
What Do These Numbers Mean in Real Terms?						
Equivalent "House Years" of Power Consumed (@ 900 KW-Hrs/Month = 10,800 KW-Hr/Year)	0	165	165	168	909	98
Equivalent "Car Years" of CO ₂ Emissions (@ 11,450 pounds of CO ₂ emitted per car per year)	0	155	155	158	858	92

Notes:

- 1) Energy usage estimated in alternative specific cost estimates. Diesel combustion associated with heavy equipment operation not estimated.
- 2) Total electrical and natural gas usage per alternative converted to common units and summed.
- 3) A common assumption was made that all energy would be used evenly over one year.
- 4) Zip Code for SRSNE Site determined from EPA Fact Sheet.
- 5) Site Zip Code was input into EPA "Power Profiler" available at www.epa.gov/powpro/screen1.html.
- 6) Average monthly energy use input into "Option 2: Average Monthly Use" space in "Power Profiler"
- 7) Air emissions associated with use of alternative specific energy calculated by "Power Profiler" (see attached)
- 8) Average annual household power consumption and annual carbon dioxide emissions per car take from EPA "Power Profiler" results.



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Attachment C

Attachment C
 Table of Documents Produced During the RI/FS Process
 Removal Response Administrative Record Files

Title ENGINEERING REPORT FOR OFF-SITE GROUNDWATER INTERCEPTOR SYSTEM INCLUDING FINAL ENGINEERING DRAWINGS AND EQUIPMENT SPECIFICATIONS
Document Date 28-Feb-1984
Document ID 6243
Author Org LOUREIRO ENGINEERING ASSOCIATES INC
 YORK WASTEWATER CONSULTANTS INC
Addressee Org SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 28
Image \6243\00000001.tif 28
VolumelD CD1
Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title ESTIMATES OF VOLATILE ORGANIC COMPOUNDS CAPTURED BY ON-SITE SYSTEM
Document Date 09-Feb-1990
Document ID 5179
Author Name LIYANG CHU
Author Org NUS/TETRA TECH INC
Addressee Org US EPA REGION 1
Addressee Name MATTHEW R HOAGLAND
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 13
Image \5179\00000001.tif 13
VolumelD CD1
Document Type LETTER
Phase Activity REMOVAL RESPONSE

Title DOCUMENTATION FOR SHALLOW WELL INTERCEPTOR SYSTEM, INCLUDING TWO TABLES SUMMARIZING GROUNDWATER LEVELS IN HYDRAULIC VERIFICATION WELLS AND GROUNDWATER INTERCEPTOR WELLS AND 1 FIGURE DEPICTING GROUNDWATER CONTOURS, ALL BASED ON 06/27/1991 DATA
Document Date 23-Jul-1991
Document ID 5094
Author Name SARAH F JOHNSON
Author Org TRC COMPANIES INC
Addressee Org SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Addressee Name BRIAN NADEAU
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 6
Image \5094\00000001.tif 6

Attachment C
Table of Documents Produced During the RI/FS Process
Removal Response Administrative Record Files

VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	REMOVAL PROGRAM SUPPLEMENTAL SITE INVESTIGATION
Document Date	01-Jun-1992
Document ID	5650
Author Org	ROY F WESTON INC
Addressee Org	US EPA REGION 1
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	242
Image	\\5650\00000001.tif 242
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	REQUEST FOR REMOVAL ACTION AT THE SOLVENTS RECOVERY SERVICE OF NEW ENGLAND SITE
Document Date	28-Aug-1992
Document ID	8307
Author Name	GARY LIPSON
Author Org	US EPA REGION 1
Addressee Org	US EPA REGION 1
Addressee Name	JULIE BELAGA
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	13
Image	\\8307\00000001.tif 13
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Document Type	MEMO
Phase Activity	REMOVAL RESPONSE
Title	ENGINEERING EVALUATION / COST ANALYSIS (EE/CA) FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA), FINAL
Document Date	01-Dec-1992
Document ID	5562
Author Org	NUS/TETRA TECH INC
Addressee Org	US EPA REGION 1
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	334
Image	\\5562\00000001.tif 334
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	REQUEST FOR REMOVAL ACTION AT THE SOLVENTS RECOVERY SERVICE OF NEW ENGLAND SITE

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Document Date 01-Apr-1993
Document ID 8330
Author Name MICHAEL NALIPINSKI
Author Org US EPA REGION 1
Addressee Org US EPA REGION 1
Addressee Name PAUL G KEOUGH
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 22
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VolumelD CD1
Document Type MEMO
Phase Activity REMOVAL RESPONSE

Title RESPONSIVENESS SUMMARY FOR NON-TIME CRITICAL
REMOVAL ACTION (NTCRA)

Document Date 01-Apr-1993
Document ID 4883
Author Org US EPA REGION 1
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 52
Image \4883\00000001.tif 52
VolumelD CD1
Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title REQUEST FOR REMOVAL ACTION AT THE SOLVENTS
RECOVERY SERVICE OF NEW ENGLAND SITE, ACTION
MEMORANDUM

Document Date 08-Nov-1993
Document ID 8306
Author Name DOROTHY L GIRTEN
Author Org US EPA REGION 1
Addressee Org US EPA REGION 1
Addressee Name PAUL G KEOUGH
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 8
Image \8306\00000001.tif 8
VolumelD CD1
Document Type MEMO
Phase Activity REMOVAL RESPONSE

Title ENGINEERING EVALUATION / COST ANALYSIS (EE/CA)
REPORT, FOR NON-TIME CRITICAL REMOVAL (NTCRA) 2,
FINAL

Document Date 01-Nov-1994
Document ID 5590

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Author Org	NUS/TETRA TECH INC
Addressee Org	US EPA REGION 1
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	392
Image	\5590\00000001.tif 392
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	100% GROUNDWATER CONTAINMENT AND TREATMENT SYSTEM DESIGN REPORT FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date	01-Dec-1994
Document ID	6258
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	476
Image	\6258\00000001.tif 476
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	CONCEPTUAL WETLANDS MITIGATION PLAN
Document Date	01-Apr-1995
Document ID	225371
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	43
Image	\225371\00000001.tif 43
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	GROUNDWATER CONTAINMENT AND TREATMENT SYSTEM IMPLEMENTATION WORK PLAN FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date	01-Jun-1995
Document ID	6259
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604

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Document Type WORK PLAN
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE PLAN FOR NON-TIME CRITICAL REMOVAL (NTCRA) 1
Document Date 01-Jun-1995
Document ID 6245
Author Org BLASLAND BOUCK & LEE INC
Addressee Org SRS PRP GROUP
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Image \6245\00000001.tif 113
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Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title REQUEST FOR REMOVAL ACTION AT THE SOLVENTS RECOVERY SERVICE OF NEW ENGLAND SITE, SOUTHTON, CT [NON-TIME CRITICAL REMOVAL ACTION (NTCRA) #2]
Document Date 01-Jun-1995
Document ID 8308
Author Name KELLY S MCCARTY
Author Org US EPA REGION 1
Addressee Org US EPA REGION 1
Addressee Name JOHN P DEVILLARS
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Document Type MEMO
Phase Activity REMOVAL RESPONSE

Title NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1 AS-BUILT DESIGN DOCUMENTS, ATTACHMENTS 2-5, WITH TRANSMITTAL
Document Date 30-Aug-1995
Document ID 4930
Author Name EDWARD R LYNCH
Author Org BLASLAND BOUCK & LEE INC
Addressee Org US EPA REGION 1
Addressee Name KELLY S MCCARTY
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND

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Document Type	DRAWING
Phase Activity	REMOVAL RESPONSE
Title	NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1 AS-BUILT DESIGN DOCUMENTS, ATTACHMENT 1
Document Date	30-Aug-1995
Document ID	4931
Author Org	BLASLAND BOUCK & LEE INC
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\4931\00000001.tif 1
VolumelD	CD1
Document Type	DRAWING
Phase Activity	REMOVAL RESPONSE
Title	Non-Time-Critical Removal Action No. 1: Demonstration of Compliance Report #1, July 19, 1995 - August 18, 1995.
Document Date	Aug-1995
Author Org	BLASLAND BOUCK & LEE INC
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Report
Phase Activity	REMOVAL RESPONSE
Title	ON-SITE INTERCEPTOR SYSTEM, MONITORING WELL ABANDONMENT ACTIVITIES DURING NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date	26-Oct-1995
Document ID	5584
Author Name	EDWARD R LYNCH
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	KELLY S MCCARTY
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
Image	\5584\00000001.tif 20
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	DETAILED WETLANDS MITIGATION DESIGN
Document Date	01-Sep-1995
Document ID	225372
Author Org	BLASLAND BOUCK & LEE INC

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Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	66
Image	\\225372\00000001.tif 66
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	APPROVAL OF DEMONSTRATION OF COMPLIANCE PLAN 1 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date	22-Sep-1995
Document ID	5334
Author Name	KELLY S MCCARTY
Author Org	US EPA REGION 1
Addressee Org	SRS PRP GROUP
Addressee Name	A J MOODY
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\5334\00000001.tif 1
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	Non-Time-Critical Removal Action No. 1: Demonstration of Compliance Report #2, August 19, 1995 - September 30, 1995
Document Date	Oct-1995
Author Org	BLASLAND BOUCK & LEE INC
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Report
Phase Activity	REMOVAL RESPONSE
Title	APPROVAL OF DEMONSTRATION OF COMPLIANCE REPORT 2 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date	01-Nov-1995
Document ID	5335
Author Name	KELLY S MCCARTY
Author Org	US EPA REGION 1
Addressee Org	SRS PRP GROUP
Addressee Name	A J MOODY
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
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Document Type	LETTER

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Title	APPROVAL OF DEMONSTRATION OF COMPLIANCE REPORT 3 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date	21-Nov-1995
Document ID	5336
Author Name	KELLY S MCCARTY
Author Org	US EPA REGION 1
Addressee Org	SRS PRP GROUP
Addressee Name	A J MOODY
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\5336\00000001.tif 1
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 3 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 09/01-31/1995
Document Date	01-Nov-1995
Document ID	5337
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	49
Image	\\5337\00000001.tif 49
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	ON-SITE INTERCEPTOR SYSTEM, MONITORING WELL ABANDONMENT REPORT REVIEWED AND FOUND ADEQUATE
Document Date	06-Nov-1995
Document ID	5585
Author Name	MARK R LEWIS
Author Org	CT DEPT OF ENVIRONMENTAL PROTECTION
Addressee Org	US EPA REGION 1
Addressee Name	KELLY S MCCARTY
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\5585\00000001.tif 1
VolumelD	CD1
Document Type	LETTER
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Title	COMMENTS ON ON-SITE INTERCEPTOR SYSTEM AND MONITORING WELL ABANDONMENT DURING NON-TIME CRITICAL REMOVAL ACTION 1 (NTCRA) REPORT AND PRIVATE WELL MONITORING REPORT
Document Date	09-Nov-1995
Document ID	5586
Author Name	LIYANG CHU
Author Org	NUS/TETRA TECH INC
Addressee Org	US EPA REGION 1
Addressee Name	KELLY S MCCARTY
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	3
Image	\\5586\00000001.tif 3
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Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 4 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 11/01-30/1995
Document Date	06-Dec-1995
Document ID	5338
Author Name	JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KELLY S MCCARTY
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	22
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VolumeID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 5 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 12/01-31/1995
Document Date	05-Jan-1996
Document ID	5339
Author Name	JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KELLY S MCCARTY
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
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VolumeID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE

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Title DEMONSTRATION OF COMPLIANCE REPORT 6 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 01/01-31/1996
Document Date 06-Feb-1996
Document ID 5340
Author Name JOSEPH LANDWYN
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE REPORT 7 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 02/01-01/1996
Document Date 06-Mar-1996
Document ID 5341
Author Name JOSEPH LANDWYN
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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VolumelD CD1
Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE REPORT 8 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 03/01-31/1996, LETTER MISDATED, RECEIVED 04/09/1996
Document Date 06-Mar-1996
Document ID 5342
Author Name JOSEPH LANDWYN
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Document Type REPORT
Phase Activity REMOVAL RESPONSE

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Title DEMONSTRATION OF COMPLIANCE REPORT 9 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 04/01-30/1996
Document Date 06-May-1996
Document ID 5343
Author Name JOSEPH LANDWYN
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE REPORT 10 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 05/01-01/1996
Document Date 06-Jun-1996
Document ID 5344
Author Name JOSEPH LANDWYN
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Image \5344\00000001.tif 22
VolumelD CD1
Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE REPORT 11 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 06/01-30/1996
Document Date 03-Jul-1996
Document ID 5345
Author Name JOSEPH LANDWYN
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Document Type REPORT
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Title DESIGN AND STUDY WORK PLAN FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 2
Document Date 01-Aug-1996
Document ID 5593
Author Org BLASLAND BOUCK & LEE INC
Addressee Org SRS PRP GROUP
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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VolumelD CD1
Document Type WORK PLAN
Phase Activity REMOVAL RESPONSE

Title NTCRA 2 – draft Design and Study Work Plan – August 1996
Document Date August 1996
Author Org BLASLAND BOUCK & LEE INC
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Report
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE REPORT 12 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 07/01-31/1996
Document Date 06-Aug-1996
Document ID 5346
Author Name JOSEPH LANDWYN
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE REPORT 13 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 08/01-31/1996
Document Date 05-Sep-1996
Document ID 5348
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604

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Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 14 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 09/01-30/1996
Document Date	04-Oct-1996
Document ID	5349
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
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Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 15 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 09/01-31/1996
Document Date	06-Nov-1996
Document ID	5350
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	21
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VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 16 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 11/01-27/1996
Document Date	06-Dec-1996
Document ID	5351
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
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Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 17 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 11/28-31/1996
Document Date	06-Jan-1997
Document ID	5352
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	21
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Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 18 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 01/01-31/1997
Document Date	06-Feb-1997
Document ID	5353
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
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VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	CERTIFICATION STATEMENT FOR DEMONSTRATION OF COMPLIANCE REPORT 18 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date	06-Jan-1997
Document ID	5354
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
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Document Type	REPORT
Phase Activity	REMOVAL RESPONSE

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Title DEMONSTRATION OF COMPLIANCE REPORT 19 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 02/01-28/1997
Document Date 06-Mar-1997
Document ID 5355
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title CERTIFICATION STATEMENT FOR DEMONSTRATION OF COMPLIANCE REPORT 19 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date 10-Mar-1997
Document ID 5356
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 2
Image \5356\00000001.tif 2
VolumelD CD1
Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE REPORT 20 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 03/01-31/1997
Document Date 04-Apr-1997
Document ID 5357
Author Org HANDEX OF NEW ENGLAND INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
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Document Type REPORT
Phase Activity REMOVAL RESPONSE

Title DEMONSTRATION OF COMPLIANCE REPORT 24 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 07/01-31/1997

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Document Date	08-Aug-1997
Document ID	5358
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	19
Image	\5358\00000001.tif 19
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 25 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 08/01-31/1997
Document Date	08-Sep-1997
Document ID	5359
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	18
Image	\5359\00000001.tif 18
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	Draft NTCRA 2 Interim Technical Memorandum - September 25, 1997.
Document Date	September 25, 1997.
Author Org	BLASLAND BOUCK & LEE INC
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Report
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 26 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 09/01-30/1997
Document Date	06-Oct-1997
Document ID	5360
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	19

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VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 27 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 10/01-31/1997
Document Date	08-Nov-1997
Document ID	5361
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	18
Image	\5361\00000001.tif 18
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING PLAN, 06/1998, REVISED 11/1998
Document Date	01-Nov-1998
Document ID	5620
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	17
Image	\5620\00000001.tif 17
VolumelD	CD1
Document Type	WORK PLAN
Phase Activity	REMOVAL RESPONSE
Title	DEMOLITION OF OPERATIONS AREA
Document Date	01-Jul-1999
Document ID	5623
Author Org	DE MAXIMIS INC
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	190
Image	\5623\00000001.tif 190
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING REPORT 1
Document Date	17-Feb-1999
Document ID	5644

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Author Name	GARY R CAMERON
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Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	45
Image	\5644\00000001.tif 45
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING REPORT 2
Document Date	03-Aug-1999
Document ID	5645
Author Name	GARY R CAMERON
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	BYRON MAH
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	29
Image	\5645\00000001.tif 29
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 21 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 04/01-30/1997
Document Date	07-May-1997
Document ID	5658
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	19
Image	\5658\00000001.tif 19
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 22 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 05/01-05/31/1997
Document Date	09-Jun-1997
Document ID	5659
Author Name	GERALD H CRESAP
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1

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Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
Image	\5659\00000001.tif 20
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 23 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 06/01-30/1997
Document Date	07-Jul-1997
Document ID	5661
Author Name	GERALD H CRESAP
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
Image	\5661\00000001.tif 20
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 28 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 11/01-30/1997
Document Date	05-Dec-1997
Document ID	5662
Author Name	GERALD H CRESAP
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	18
Image	\5662\00000001.tif 18
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 29 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 12/01-31/1997
Document Date	06-Jan-1998
Document ID	5663
Author Name	GERALD H CRESAP
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN

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Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	18
Image	\\5663\00000001.tif 18
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 30 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 01/01-30/1997
Document Date	06-Feb-1998
Document ID	5664
Author Name	JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	SHEILA M ECKMAN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	18
Image	\\5664\00000001.tif 18
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 31 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 01/31-02/27/1998
Document Date	06-Mar-1998
Document ID	5665
Author Name	ELIZABETH M ANDERSON
	JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC
	HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	18
Image	\\5665\00000001.tif 18
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 32 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 03/01-31/1998
Document Date	09-Apr-1998
Document ID	5667
Author Name	ELIZABETH M ANDERSON
Author Org	HANDEX OF NEW ENGLAND INC

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Addressee Org	US EPA REGION 1
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Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	17
Image	\5667\00000001.tif 17
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 33 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 04/01-30/1998
Document Date	07-May-1998
Document ID	5668
Author Name	ELIZABETH M ANDERSON JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
Image	\5668\00000001.tif 20
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 34 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 05/01-31/1998
Document Date	05-Jun-1998
Document ID	5669
Author Name	ELIZABETH M ANDERSON JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
Image	\5669\00000001.tif 20
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 35 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 06/01-30/1998
Document Date	07-Jul-1998

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Document ID	5670
Author Name	ELIZABETH M ANDERSON JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
Image	\5670\00000001.tif 20
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT 36 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 07/01-30/1998
Document Date	07-Oct-1998
Document ID	5674
Author Name	ELIZABETH M ANDERSON JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	25
Image	\5674\00000001.tif 25
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	CERTIFICATION PAGE FOR QUARTERLY DEMONSTRATION OF COMPLIANCE REPORT 36
Document Date	07-Oct-1998
Document ID	5676
Author Name	ELIZABETH M ANDERSON JOSEPH LANDWYN
Author Org	HANDEX OF NEW ENGLAND INC HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	2
Image	\5676\00000001.tif 2
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE

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Title	QUARTERLY DEMONSTRATION OF COMPLIANCE REPORT 37 FOR NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1, 10/01-30/1998
Document Date	07-Jan-1999
Document ID	5678
Author Name	JOSEPH LANDWYN CHRISTOPHER P MCCLURE
Author Org	HANDEX OF NEW ENGLAND INC HANDEX OF NEW ENGLAND INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	26
Image	\5678\00000001.tif 26
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	NON-TIME CRITICAL REMOVAL ACTION (NTCRA) #2 TECHNICAL MEMORANDUM, FINAL; UPDATED BY LETTER 05/25/1999, APPROVED BY US EPA 07/08/1999
Document Date	24-Nov-1998
Document ID	5725
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	135
Image	\5725\00000001.tif 135
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	RESPONSE TO US EPA COMMENTS REGARDING DRAFT NON- TIME CRITICAL REMOVAL ACTION (NTCRA), TWO TECHNICAL MEMORANDUM
Document Date	25-May-1999
Document ID	5726
Author Name	GARY R CAMERON
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	BYRON MAH
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	4
Image	\5726\00000001.tif 4
VolumelD	CD1
Document Type	LETTER

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Phase Activity	REMOVAL RESPONSE
Title	NOTICE OF APPROVAL OF NON-TIME CRITICAL REMOVAL ACTION (NTCRA), TWO TECHNICAL MEMORANDUM
Document Date	08-Jul-1999
Document ID	5727
Author Name	MARY JANE O'DONNELL
Author Org	US EPA REGION 1
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\5727\00000001.tif 1
VolumID	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	FINAL NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 2 100% GROUND WATER SYSTEM DESIGN REPORT
Document Date	01-Nov-1999
Document ID	44020
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SITEWIDE
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	104
Image	\44020\00000001.tif 104
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #41 FOR NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 [WITH TRANSMITTAL]
Document Date	06-Jan-2000
Document ID	222203
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	26
Image	\222203\00000001.tif 26
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #42 FOR NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) 1, [WITH TRANSMITTAL]

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Document Date	07-Apr-2000
Document ID	222204
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	25
Image	\222204\00000001.tif 25
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #43 FOR NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 [WITH TRANSMITTAL]
Document Date	10-Jul-2000
Document ID	222205
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	26
Image	\222205\00000001.tif 26
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING REPORT #4
Document Date	05-Jul-2000
Document ID	18685
Author Name	GARY R CAMERON
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	BYRON MAH
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	29
Image	\18685\00000001.tif 29
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #44 FOR NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 [WITH TRANSMITTAL]
Document Date	21-Oct-2000
Document ID	222206
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP

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Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	27
Image	\\222206\00000001.tif 27
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #45 FOR NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 [WITH TRANSMITTAL]
Document Date	05-Jan-2001
Document ID	222207
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	28
Image	\\222207\00000001.tif 28
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING REPORT #5
Document Date	09-Jan-2001
Document ID	18686
Author Name	GARY R CAMERON
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	BYRON MAH
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	35
Image	\\18686\00000001.tif 35
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #46 FOR NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 [WITH TRANSMITTAL]
Document Date	09-Apr-2001
Document ID	222208
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604

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VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	RESPONSES TO EPA COMMENTS ON THE DRAFT NTCRA 2 100% GROUNDWATER SYSTEM DESIGN REPORT
Document Date	30-May-2001
Document ID	19238
Author Name	GARY R CAMERON
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	4
Image	\\19238\00000001.tif 4
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #47 FOR NON- TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 [WITH TRANSMITTAL]
Document Date	06-Jul-2001
Document ID	222209
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	25
Image	\\222209\00000001.tif 25
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #48 FOR NON- TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 [WITH TRANSMITTAL]
Document Date	08-Oct-2001
Document ID	222210
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	26
Image	\\222210\00000001.tif 26
VolumelD	CD1

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Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	DEMONSTRATION OF COMPLIANCE REPORT #49 FOR NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 [WITH TRANSMITTAL DATED 1/8/01 IN ERROR]
Document Date	08-Jan-2002
Document ID	222211
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	26
Image	\\222211\00000001.tif 26
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING REPORT NO. 7
Document Date	09-Jan-2002
Document ID	225373
Author Name	GARY R CAMERON
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN M LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	35
Image	\\225373\00000001.tif 35
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) NO. 1 AND 2 DEMONSTRATION OF COMPLIANCE REPORT #50, JANUARY 1 THROUGH MARCH 29, 2002, FIRST QUARTER 2002 [WITH TRANSMITTAL DATED 04/18/2002]
Document Date	29-Mar-2002
Document ID	229273
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	38
Image	\\229273\00000001.tif 38
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE

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Title	NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) NO. 1 AND 2 DEMONSTRATION OF COMPLIANCE REPORT #51, APRIL 1 THROUGH JUNE 30, 2002, SECOND QUARTER 2002 [WITH TRANSMITTAL DATED 06/10/2002]
Document Date	30-Jun-2002
Document ID	229274
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	40
Image	\\229274\00000001.tif 40
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) NO. 1 AND 2 DEMONSTRATION OF COMPLIANCE REPORT #52, JULY 1 THROUGH SEPTEMBER 30, 2002, THIRD QUARTER 2002
Document Date	30-Sep-2002
Document ID	229275
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	38
Image	\\229275\00000001.tif 38
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) NO. 1 AND 2 DEMONSTRATION OF COMPLIANCE REPORT #53, OCTOBER 1 THROUGH DECEMBER 31, 2002, FOURTH QUARTER 2002
Document Date	31-Dec-2002
Document ID	229276
Author Org	HANDEX OF NEW ENGLAND INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	38
Image	\\229276\00000001.tif 38
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) NO. 1 AND 2 DEMONSTRATION OF COMPLIANCE REPORT NO. 54, 1 JANUARY THROUGH 31 MARCH 2003, FIRST QUARTER 2003

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 Table of Documents Produced During the RI/FS Process
 Removal Response Administrative Record Files

Document Date	31-Mar-2003
Document ID	229277
Author Org	WESTON SOLUTIONS INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	41
Image	\\229277\00000001.tif 41
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) NO. 1 AND 2 ANNUAL DEMONSTRATION OF COMPLIANCE REPORT NO. 55, 1 JANUARY THROUGH 31 DECEMBER 2003
Document Date	31-Dec-2003
Document ID	229278
Author Org	WESTON SOLUTIONS INC
Addressee Org	SRS PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	89
Image	\\229278\00000001.tif 89
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING REPORT NO. 11
Document Date	06-Jan-2004
Document ID	229279
Author Name	MICHAEL GEFELL
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN M LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	57
Image	\\229279\00000001.tif 57
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING REPORT NO. 12
Document Date	06-Jul-2004
Document ID	229280
Author Name	MICHAEL GEFELL
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN M LUMINO

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 Table of Documents Produced During the RI/FS Process
 Removal Response Administrative Record Files

Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	59
Image	\\229280\00000001.tif 59
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	INTERIM MONITORING AND SAMPLING REPORT NO. 13
Document Date	06-Jan-2005
Document ID	229281
Author Name	MICHAEL GEFELL
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN M LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	59
Image	\\229281\00000001.tif 59
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE
Title	EXTENSION OF OPERATIONS OF NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) CONTAINMENT SYSTEMS
Document Date	15-Feb-2005
Document ID	229284
Author Name	MARY JANE O'DONNELL
Author Org	US EPA REGION 1
Addressee Org	HALE AND DORR LLP
Addressee Name	ROBERT KIRSCH
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\229284\00000001.tif 1
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	PROPOSED WORK, CONTINUED OPERATION OF THE COMBINED NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) 1 AND 2 CONTAINMENT SYSTEMS
Document Date	14-Feb-2005
Document ID	229285
Author Name	ROBERT KIRSCH
Author Org	HALE AND DORR LLP
Addressee Org	US EPA REGION 1
Addressee Name	AUDREY ZUCKER
Access Type	RELEASABLE

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Table of Documents Produced During the RI/FS Process
Removal Response Administrative Record Files

Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\229285\00000001.tif 1
VolumID	CD1
Document Type	LETTER
Phase Activity	REMOVAL RESPONSE
Title	NON-TIME-CRITICAL REMOVAL ACTION (NTCRA) NO. 1 AND 2 ANNUAL DEMONSTRATION OF COMPLIANCE REPORT NO. 56, 1 JANUARY THROUGH 31 DECEMBER 2004
Document Date	31-Dec-2004
Document ID	229289
Author Org	WESTON SOLUTIONS INC
Addressee Org	SRSNE SITE PRP GROUP
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\229289\00000001.tif 1
VolumID	CD1
Document Type	REPORT
Phase Activity	REMOVAL RESPONSE

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Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Title	Letter from David W. Miller to Mr. Richard Woodhull, Connecticut State Department of Health. *
Document Date	September 28, 1965
Author Org	Geraghty & Miller, Consulting Ground-Water Geologists
Addressee Org	Connecticut Department of Environmental Protection (CT DEP).
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Report to Board of Water Commissioners, Southington Connecticut, on Test Wells.*
Document Date	November 24, 1975
Author Org	Walter Amory Consultant Engineers.
Addressee Org	Report to Board of Water Commissioners
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Letter to Mr. Daniel J. Christy, Superintendent, Southington Water Works Department.*
Document Date	August 8, 1978
Author Org	Walter Amory Consultant Engineers.
Addressee Org	Report to Board of Water Commissioners
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Interdepartmental Message, Subject: Hydrogeologic Conditions and Contaminant Levels in the Well Field of the Southington Water Department Wells #4 and #6. *
Document Date	October 19, 1978
Author Org	Connecticut Department of Environmental Protection (CT DEP).
Addressee Org	
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	WORK IN SUPPORT OF EPA ENFORCEMENT CASE, CONTAMINATION OF CURTISS STREET WELL FIELD, SOUTHINGTON, CT, TDD F1-8077-01A, DRAFT
Document Date	31-Oct-1980
Document ID	6414
Author Name	PAUL EXNER



-Records Not Included in the Administrative Record which were Relevant to the Decision Making Process

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Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Author Org ECOLOGY & ENVIRONMENT INC
Addressee Org US EPA REGION 1
Addressee Name MERRILL S HOHMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 148
Image \6414\00000001.tif 148
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Final Draft Hydrogeologic Investigation, Town of Southington, Connecticut.*
Document Date November 12, 1980.
Author Org Warzyn Engineering, Inc.
Addressee Org
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title INFORMATION OBTAINED REGARDING GROUNDWATER
CONTAMINATION SOUTHEAST OF PRODUCTION WELL 4,
SOUTHINGTON, CT, TDD F1-8104-09

Document Date 27-Jul-1981
Document ID 6413
Author Name MARGRET HANLEY
Author Org ECOLOGY & ENVIRONMENT INC
Addressee Org US EPA REGION 1
Addressee Name MICHAEL PARISE
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 4
Image \6413\00000001.tif 4
VolumelD CD1
Document Type LETTER
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Letter to Mr. Ernest Burkhardt, Ideal Forging Corporation, Factory Square, Southington,
Connecticut, regarding North Main Street Ground Water Study*
Document Date July 31, 1981
Author Org Clarence Welti and Associates, Inc. (Welti)
Addressee Org Forging Corporation
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND



-Records Not Included in the Administrative Record which were Relevant to the Decision Making Process

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Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Site ID	CTD009717604
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Letter to Mr. Ernest Burkhardt, Ideal Forging Corporation, Factory Square, Southington, Connecticut, regarding Geohydrological Study at Queen Street Plant. *
Document Date	October 22, 1981.
Author Org	Clarence Welti and Associates, Inc. (Welti)
Addressee Org	Forging Corporation
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Hydrogeologic Assessment and Recommendation for a Remedial Action Plan to Control Contaminant Migration and to Recover and Treat Ground Water. Prepared on behalf of the Solvent Recovery Services of New England, Inc.
Document Date	January 1982.
Author Org	Wehran Engineering Corporation.
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	HYDROGEOLOGIC ASSESSMENT REPORT, FINAL
Document Date	01-Oct-1982
Document ID	5526
Author Org	WEHRAN ENGINEERING CORP
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	55
Image	\5526\00000001.tif 55
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	WOBURN ENVIRONMENTAL STUDIES, PHASE 1 REPORT, REMEDIAL INVESTIGATION (RI), VOLUME 3 OF 3, SUBSURFACE DATA / MAPS / FIGURES
Document Date	01-Apr-1983
Document ID	214537
Author Org	ROUX ASSOCIATES STAUFFER CHEMICAL CO



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Remedial Investigation Administrative Record Files

Access Type	RELEASABLE
Operable Unit	CAP, INTERIM GROUNDWATER
Site Name	INDUSTRI-PLEX
Site ID	MAD076580950
Pages	255
Image	\\214537\00000001.tif 255
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Engineering Report for Multi-Point Shallow Well Groundwater Recovery and Treatment System, Monitoring and Sampling Program, and Preliminary Connecticut DEP Permit Application.
Document Date	June 23, 1983; Revised October 20, 1983.
Author Org	York Wastewater Consultants and Loureiro Engineering Associates, Inc.
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Final Design Plans and Specifications for Multi-Point Shallow Well Groundwater Recovery System.
Document Date	October 20, 1983; Revised November 19, 1984.
Author Org	Loureiro Engineering Associates. Prepared on behalf of the Solvents Recovery Service of New England, Inc., Southington, Connecticut.
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	ENGINEERING REPORT FOR OFF-SITE GROUNDWATER INTERCEPTOR SYSTEM, ADDENDUM 1
Document Date	08-Jun-1984
Document ID	5514
Author Org	ERM NEW ENGLAND INC YORK WASTEWATER CONSULTANTS INC
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	33
Image	\\5514\00000001.tif 33
VolumelD	CD1
Document Type	REPORT



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Remedial Investigation Administrative Record Files

Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	ENGINEERING REPORT FOR OFF-SITE GROUNDWATER INTERCEPTOR SYSTEM, ADDENDUM 1 TO 02/28/1984 SUBMITTAL
Document Date	22-Jun-1984
Document ID	5527
Author Org	YORK WASTEWATER CONSULTANTS INC
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	64
Image	\5527\00000001.tif 64
VolumID	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Off-Site Ground-Water Recovery System, Drawing No. 1, Solvents Recovery Service of New England, Inc., Southington, Connecticut. Design Drawing dated February 1984. Revision dated September 24, 1985. Presented as attachment to Letter from Salvatore A. Palaia, P.E., Loureiro Engineers to James Leonard, US Army Corps of Engineers. July 29, 1986.
Document Date	July 29, 1986.
Author Org	Loureiro Engineering Associates.
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Results of Pumping Test Analysis for Recovery Wells at Solvents Recovery Service of New England, Inc., Southington, Connecticut.
Document Date	October 1986.
Author Org	Ground-Water Associates (GWA).
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Corrective Measures Plan for Primary and Secondary Lagoons, Drum Storage Areas, Tank Farm, Incinerator Site.
Document Date	May 1986; Revised November 1986.
Author Org	York Wastewater Consultants, Inc. (YWC)



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Remedial Investigation Administrative Record Files

Addressee Org USEPA
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title PRELIMINARY HEALTH ASSESSMENT
Document Date 15-Dec-1988
Document ID 5120
Author Org US PUBLIC HEALTH SERVICE/ATSDR
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 11
Image \5120\00000001.tif 11
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title LABORATORY REPORT OF 16 GROUNDWATER SAMPLES
FROM OFF-SITE WELLS, TAKEN ON 05/17-18/1989
Document Date 20-Jun-1989
Document ID 5538
Author Name KEITH E WARNER
Author Org YORK WASTEWATER CONSULTANTS INC
Addressee Org SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Addressee Name JAMES R HULM
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 11
Image \5538\00000001.tif 11
VolumelD CD1
Document Type LETTER
Phase Activity REMEDIAL INVESTIGATION (RI)

Title BIOTOXICITY MONITORING TEST RESULTS, FOR
MONITORING DONE 01/15-19/1990, OF PLANT EFFLUENT AND
WATER FROM QUINNIPIAC RIVER
Document Date 01-Jan-1990
Document ID 5535
Author Org ENVIRONMENTAL SCIENCE CORP
Addressee Org SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Access Type RELEASABLE
Operable Unit SOURCE CONTROL



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Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	20
Image	\5535\00000001.tif 20
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	LABORATORY REPORT FOR WATER SAMPLES TAKEN 01/16/1990 FROM PLANT EFFLUENT AND RIVER EFFLUENT
Document Date	16-Jan-1990
Document ID	5528
Author Org	ENVIRONMENTAL SCIENCE CORP
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Addressee Name	PAUL LETENDRE
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	10
Image	\5528\00000001.tif 10
VolumelD	CD1
Document Type	SAMPLING & ANALYSIS DATA
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	LABORATORY REPORT FOR MONITORING DONE 01/17/1990
Document Date	17-Jan-1990
Document ID	5537
Author Org	ENVIRONMENTAL SCIENCE CORP
Addressee Org	TRC COMPANIES INC
Addressee Name	MICHAEL SUSCA
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	15
Image	\5537\00000001.tif 15
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	LABORATORY REPORT FOR WATER SAMPLES TAKEN 01/17/1990 FROM PLANT EFFLUENT AND RIVER EFFLUENT
Document Date	17-Jan-1990
Document ID	5530
Author Org	ENVIRONMENTAL SCIENCE CORP
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Addressee Name	PAUL LETENDRE
Access Type	RELEASABLE



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Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	10
Image	\5530\00000001.tif 10
VolumelD	CD1
Document Type	SAMPLING & ANALYSIS DATA
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	LABORATORY REPORT FOR WATER SAMPLES TAKEN 01/18/1990 FROM PLANT EFFLUENT AND RIVER EFFLUENT
Document Date	18-Jan-1990
Document ID	5531
Author Org	ENVIRONMENTAL SCIENCE CORP
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Addressee Name	PAUL LETENDRE
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	11
Image	\5531\00000001.tif 11
VolumelD	CD1
Document Type	SAMPLING & ANALYSIS DATA
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	LABORATORY REPORT FOR WATER SAMPLES TAKEN 01/19/1990 FROM PLANT EFFLUENT AND RIVER EFFLUENT
Document Date	19-Jan-1990
Document ID	5532
Author Org	ENVIRONMENTAL SCIENCE CORP
Addressee Org	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Addressee Name	PAUL LETENDRE
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	9
Image	\5532\00000001.tif 9
VolumelD	CD1
Document Type	SAMPLING & ANALYSIS DATA
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	TOXICITY REPORT FOR COMPARATIVE TOXICITY TESTING
Document Date	25-Jan-1990
Document ID	5533
Author Name	CAROL E BOWER
Author Org	NEW ENGLAND BIOASSAY INC
Addressee Org	ENVIRONMENTAL SCIENCE CORP



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Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Addressee Name THOMAS MCGLOIN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 34
Image \5533\00000001.tif 34
VolumelD CD1
Document Type LETTER
Phase Activity REMEDIAL INVESTIGATION (RI)

Title SAMPLING AND ANALYSIS PLAN FOR REMEDIAL INVESTIGATION / FEASIBILITY STUDY (RI/FS), FINAL
Document Date 01-May-1990
Document ID 5002
Author Org NUS/TETRA TECH INC
Addressee Org US EPA REGION 1
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 147
Image \5002\00000001.tif 147
VolumelD CD1
Document Type WORK PLAN
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Estimates of Air Emissions from the Cooling Tower, Solvents Recovery Service (SRSNE) of New England Site RI/FS.
Document Date April 23, 1990.
Author Org Halliburton NUS (HNUS) Environmental Corporation.
Addressee Org US EPA REGION 1
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Letter
Phase Activity REMEDIAL INVESTIGATION (RI)

Title TRANSMITTAL FOR ADDENDUM TO PRELIMINARY HEALTH ASSESSMENT BASED ON 05/1990 SAMPLING DATA
Document Date 15-Oct-1990
Document ID 5605
Author Name MARTHA DEE KENT
Author Org US PUBLIC HEALTH SERVICE/ATSDR
Addressee Org US PUBLIC HEALTH SERVICE/ATSDR
Addressee Name LOUISE A HOUSE
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND



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* Documents included in the Group's comments on the Preliminary groundwater Use and Value Determination; Appendix B of the June 2000 FS and June 2004 FS Documents.

Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Site ID	CTD009717604
Pages	1
Image	\5605\00000001.tif 1
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	ADDENDUM TO PRELIMINARY HEALTH ASSESSMENT BASED ON 05/1990 SAMPLING DATA
Document Date	15-Oct-1990
Document ID	5606
Author Org	US PUBLIC HEALTH SERVICE/ATSDR
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	6
Image	\5606\00000001.tif 6
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	RESIDENTIAL WELL SAMPLING LISTING, WITH REDACTIONS
Document Date	18-Dec-1990
Document ID	222216
Author Name	LIYANG CHU
Author Org	NUS/TETRA TECH INC
Addressee Org	US EPA REGION 1
Addressee Name	MARGARET VELIE
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	4
Image	\222216\00000001.tif 4
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	SURFACE GEOPHYSICAL SURVEYS
Document Date	01-Apr-1991
Document ID	5621
Author Org	HAGER-RICHTER GEOSCIENCE INC
Addressee Org	NUS/TETRA TECH INC
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	28



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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Image	\5621\00000001.tif 28
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	RESPONSE TO REQUEST FOR INFORMATION REGARDING CONTAMINATION IN GROUNDWATER AND SURFACE WATER, INCLUDES TWO TABLES
Document Date	19-Aug-1991
Document ID	5200
Author Name	BETSY SHAW
Author Org	US EPA REGION 1
Addressee Name	DARRELL KERN
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	4
Image	\5200\00000001.tif 4
VolumelD	CD1
Document Type	LETTER
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	PROPOSED TECHNOLOGIES FOR TREATABILITY STUDIES
Document Date	01-Oct-1991
Document ID	5728
Author Org	NUS/TETRA TECH INC
Addressee Org	US EPA REGION 1
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	47
Image	\5728\00000001.tif 47
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	PHASE 2 TECHNICAL MEMORANDUM, FINAL
Document Date	01-Jun-1992
Document ID	5525
Author Org	NUS/TETRA TECH INC
Addressee Org	US EPA REGION 1
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	538



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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Image	\5525\00000001.tif 538
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	Removal Program, Supplemental Site Investigation.
Document Date	June 1992.
Author Org	Roy F. Weston, Inc. Technical Assistance Team (TAT).
Addressee Org	USEPA, Contract No. 68-WO-0036, TAT 01-N-01083, TDD No. 01-9204-04A.
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	SEISMIC REFRACTION SURVEY
Document Date	01-Jun-1992
Document ID	5587
Author Org	HAGER-RICHTER GEOSCIENCE INC
Addressee Org	NUS/TETRA TECH INC
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	39
Image	\5587\00000001.tif 39
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	PUBLIC HEALTH ASSESSMENT
Document Date	21-Jul-1992
Document ID	5178
Author Org	US DHHS/US PUBLIC HEALTH SERVICE
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	75
Image	\5178\00000001.tif 75
VolumelD	CD1
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)
Title	WETLANDS EVALUATION STUDY, TECHNICAL MEMORANDUM, FINAL
Document Date	01-Dec-1993
Document ID	5589



-Records Not Included in the Administrative Record which were Relevant to the Decision Making Process

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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Author Org NUS/TETRA TECH INC
Addressee Org US EPA REGION 1
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 48
Image \5589\00000001.tif 48
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title SOIL, GROUNDWATER, ADDITIONAL STUDIES WORK PLAN, FINAL
Document Date 01-Mar-1994
Document ID 5624
Author Org ENSR CONSULTING & ENGINEERING
Addressee Org SRS PRP GROUP
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 464
Image \5624\00000001.tif 464
VolumelD CD1
Document Type WORK PLAN
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Final Soil, Groundwater, and Additional Studies Work Plan for the SRSNE Superfund Site.
Document Date March 1994
Author Org ENSR Consulting and Engineering
Addressee Org US EPA REGION 1
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title REMEDIAL INVESTIGATION (RI) REPORT, VOLUME 1 OF 4, TEXT, FINAL
Document Date 01-May-1994
Document ID 4877
Author Org NUS/TETRA TECH INC
Addressee Org US EPA REGION 1
Access Type RELEASABLE
Operable Unit SOURCE CONTROL



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Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 462
Image \4877\00000001.tif 462
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title REMEDIAL INVESTIGATION (RI) REPORT, VOLUME 2 OF 4, TABLES, FINAL
Document Date 01-May-1994
Document ID 4878
Author Org NUS/TETRA TECH INC
Addressee Org US EPA REGION 1
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 371
Image \4878\00000001.tif 371
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title REMEDIAL INVESTIGATION (RI) REPORT, VOLUME 3 OF 4, FIGURES, APPENDIX A OF VOLUME 4 OF 4, FINAL
Document Date 01-May-1994
Document ID 4879
Author Org NUS/TETRA TECH INC
Addressee Org US EPA REGION 1
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 330
Image \4879\00000001.tif 330
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title REMEDIAL INVESTIGATION (RI) REPORT, VOLUME 4 OF 4, APPENDICES B THROUGH H, FINAL
Document Date 01-May-1994
Document ID 4880
Author Org NUS/TETRA TECH INC
Addressee Org US EPA REGION 1
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND



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Attachment C
 Table of Documents Produced During the RI/FS Process
 Remedial Investigation Administrative Record Files

Site ID CTD009717604
Pages 533
Image \4880\00000001.tif 533
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title GROUNDWATER TECHNICAL MEMORANDUM, SOIL STUDY & ADDITIONAL STUDIES REPORT, VOLUME 1, DRAFT
Document Date 01-Jun-1994
Document ID 4875
Author Org ENSR CONSULTING & ENGINEERING
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 426
Image \4875\00000001.tif 426
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Groundwater Technical Memorandum, Soils Study, and Additional Studies Report for the SRSNE Superfund Site Volume I - Groundwater Technical Memorandum
Document Date Jun-94
Document ID ENSR - June 1994 - Groundwater Tech Memo
Author Org ENSR Consulting and Engineering
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Pages 380
Volume ID Volume I - Groundwater Technical Memorandum
Document Type Memorandum
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Groundwater Technical Memorandum, Soils Study, and Additional Studies Report for the SRSNE Superfund Site Volume II - Soils Study Report
Document Date Jun-94
Document ID ENSR - June 1994 - Soils Study Report
Author Org ENSR Consulting and Engineering
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Pages 183
Volume ID Volume II - Soils Study Report
Document Memorandum



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Attachment C
 Table of Documents Produced During the RI/FS Process
 Remedial Investigation Administrative Record Files

Type	
Phase Activity	REMEDIAL INVESTIGATION (RI)

Title	Groundwater Technical Memorandum, Soils Study, and Additional Studies Report for the SRSNE Superfund Site Volume III - Additional Studies Report
Document Date	Jun-94
Document ID	ENSR - June 1994 - Additional Study Report
Author Org	ENSR Consulting and Engineering
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	440
Volume ID	Volume III - Additional Studies Report
Document Type	Memorandum
Phase Activity	REMEDIAL INVESTIGATION (RI)

Title	Residential Wells Inventory Map and List, Solvents Recovery Service of New England, Inc. Site, Southington, Connecticut,
Document Date	July 1994.
Author Org	Halliburton NUS (HNUS) Environmental Corporation.
Addressee Org	SRS PRP GROUP
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	
Document Type	REPORT
Phase Activity	REMEDIAL INVESTIGATION (RI)

Title	Sample Identification Numbers/SRSNE
Document Date	21-Nov-94
Document ID	ENSR Memo - November 21, 1994 - GW Snapshot 1
Author Org	ENSR Consulting and Engineering
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	22
Document Type	Memorandum
Phase Activity	REMEDIAL INVESTIGATION (RI)



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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Title	Results of Comprehensive Groundwater Sampling SRSNE, Southington, CT March/April, 1995
Document Date	19-Jun-95
Document ID	ENSR Letter - June 19 - GW Snapshot 2
Author Org	ENSR Consulting and Engineering
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	52
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)

Title Conceptual Wetlands Mitigation Plan
Document Date April-95
Author Org BLASLAND BOUCK & LEE INC
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Document Type Report
Phase Activity REMEDIAL INVESTIGATION (RI)

Title PRIVATE WELL MONITORING REPORT, ASSOCIATED WITH
NON-TIME CRITICAL REMOVAL ACTION (NTCRA) 1
Document Date 01-Oct-1995
Document ID 5648
Author Org BLASLAND BOUCK & LEE INC
Addressee Org SRS PRP GROUP
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 62
Image \5648\00000001.tif 62
VolumelD CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Detailed Wetlands Mitigation Design
Document Date September-95
Author Org BLASLAND BOUCK & LEE INC
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Document Type Report
Phase Activity REMEDIAL INVESTIGATION (RI)

Title REMEDIAL INVESTIGATION (RI) WORK PLAN



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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Document Date 01-Nov-1995
Document ID 5591
Author Org BLASLAND BOUCK & LEE INC
Addressee Org SRS PRP GROUP
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 197
Image \5591\00000001.tif 197
VolumelD CD1
Document Type WORK PLAN
Phase Activity REMEDIAL INVESTIGATION (RI)

Title EPA RI Work Plan Comments
Document Date January 1996
Author Org United States Environmental Protection Agency, Region I
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Document Type Letter
Phase Activity REMEDIAL INVESTIGATION (RI)

Title ADDENDUM TO REMEDIAL INVESTIGATION (RI) WORK
PLAN IN RESPONSE TO COMMENTS BY HALLIBURTON NUS,
CT DEP AND US EPA
Document Date 13-Feb-1996
Document ID 4953
Author Name GARY R CAMERON
Author Org BLASLAND BOUCK & LEE INC
Addressee Org US EPA REGION 1
Addressee Name SHEILA M ECKMAN
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 10
Image \4953\00000001.tif 10
VolumelD CD1
Document Type LETTER
Phase Activity REMEDIAL INVESTIGATION (RI)

Title SRSNE Superfund Site, Southington, CT, EPA Comments on Draft Remedial
Investigation Work Plan and Draft Project Operations Plan
Document Date April 4, 1996
Author Org United States Environmental Protection Agency, Region I
Site Name Solvent Recovery Service of New England



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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Site ID	CTD009717604
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)

Title ADDENDUM 2 TO REMEDIAL INVESTIGATION (RI) WORK
PLAN PREPARED BY BLASLAND, BOUCK & LEE INC, 11/1995

Document Date 07-Jun-1996

Document ID 4959

Author Name GARY R CAMERON

Author Org BLASLAND BOUCK & LEE INC

Addressee Org US EPA REGION 1

Addressee Name SHEILA M ECKMAN

Access Type RELEASABLE

Operable Unit SOURCE CONTROL

Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND

Site ID CTD009717604

Pages 10

Image \4959\00000001.tif 10

VolumelD CD1

Document Type WORK PLAN

Phase Activity REMEDIAL INVESTIGATION (RI)

Title ADDENDUM 3 TO REMEDIAL INVESTIGATION (RI) WORK
PLAN SUBMITTED BY BLASLAND, BOUCK & LEE INC, 11/1995

Document Date 18-Jul-1996

Document ID 4961

Author Name GARY R CAMERON

Author Org BLASLAND BOUCK & LEE INC

Addressee Org US EPA REGION 1

Addressee Name SHEILA M ECKMAN

Access Type RELEASABLE

Operable Unit SOURCE CONTROL

Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND

Site ID CTD009717604

Pages 6

Image \4961\00000001.tif 6

VolumelD CD1

Document Type LETTER

Phase Activity REMEDIAL INVESTIGATION (RI)

Title SAMPLING AND ANALYSIS PLAN, PART 1 OF 2, QUALITY
ASSURANCE PROJECT PLAN (QAPP)

Document Date 01-Aug-1996

Document ID 4967

Author Org BLASLAND BOUCK & LEE INC

Addressee Org SRS PRP GROUP



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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 247
Image \4967\00000001.tif 247
VolumID CD1
Document Type WORK PLAN
Phase Activity REMEDIAL INVESTIGATION (RI)

Title SAMPLING AND ANALYSIS PLAN, PART 2 OF 2, FIELD SAMPLING PLAN

Document Date 01-Aug-1996
Document ID 4968
Author Org BLASLAND BOUCK & LEE INC
Addressee Org SRS PRP GROUP
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 188
Image \4968\00000001.tif 188
VolumID CD1
Document Type WORK PLAN
Phase Activity REMEDIAL INVESTIGATION (RI)

Title SITE MANAGEMENT PLAN
Document Date 01-Aug-1996
Document ID 4969
Author Org BLASLAND BOUCK & LEE INC
Addressee Org SRS PRP GROUP
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 121
Image \4969\00000001.tif 121
VolumID CD1
Document Type WORK PLAN
Phase Activity REMEDIAL INVESTIGATION (RI)

Title SRSNE Superfund Site, Southington, CT, Approval of Remedial Investigation Work Plan and Draft Project Operations Plan
Document Date August 14, 1996
Author Org United States Environmental Protection Agency, Region I
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Document Type Letter



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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Phase Activity	REMEDIAL INVESTIGATION (RI)
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Title CANCER INCIDENCE IN SOUTHLINGTON, CT 1968-1991 IN
RELATION TO EMISSIONS
Document Date 01-Mar-1997
Document ID 5594
Author Org CT DEPT OF ENVIRONMENTAL PROTECTION
US PUBLIC HEALTH SERVICE/ATSDR
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 73
Image \5594\00000001.tif 73
VolumID CD1
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Preliminary Ground Water Use and Value Determination, Solvents Recovery Service
Federal National Priorities List Superfund Site, Southington, Connecticut.
Document Date October 3, 1997.
Author Org Connecticut Department of Environmental Protection (CT DEP)
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Document Type Report
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Draft Remedial Investigation Report
Document Date November 1997
Author Org BLASLAND BOUCK & LEE INC
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Document Type Report
Phase Activity REMEDIAL INVESTIGATION (RI)

Title	SRSNE Superfund Site, Comments on the Draft Remedial Investigation Report
Document Date	22-Jan-98
Document ID	EPA Letter -- January 22, 1998
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	2
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)



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Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Title	SRSNE Superfund Site, Comments on the Draft Remedial Investigation Report
Document Date	27-Feb-98
Document ID	EPA Letter -- February 27, 1998
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	6
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)

Title REMEDIAL INVESTIGATION (RI) REPORT, VOLUME 1 OF 2, TEXT & FIGURES

Document Date 01-Jun-1998

Document ID 4932

Author Org BLASLAND BOUCK & LEE INC

Addressee Org SRS PRP GROUP

Access Type RELEASABLE

Operable Unit SOURCE CONTROL

Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND

Site ID CTD009717604

Pages 248

Image \4932\00000001.tif 248

VolumelD CD1

Document Type REPORT

Phase Activity **REMEDIAL INVESTIGATION (RI)**

Title REMEDIAL INVESTIGATION (RI) REPORT, VOLUME 2 OF 2, APPENDICES

Document Date 01-Jun-1998

Document ID 4933

Author Org BLASLAND BOUCK & LEE INC

Addressee Org SRS PRP GROUP

Access Type RELEASABLE

Operable Unit SOURCE CONTROL

Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND

Site ID CTD009717604

Pages 776

Image \4933\00000001.tif 776

VolumelD CD1

Document Type REPORT

Phase Activity **REMEDIAL INVESTIGATION (RI)**



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Attachment C
 Table of Documents Produced During the RI/FS Process
 Remedial Investigation Administrative Record Files

Title	SRSNE NPL Site- Letter to Gary Cameron to Martin Beskind dated July 27, 1999, "Proposal and Rational Regarding Ground-Water Background Location"
Document Date	2-Sep-99
Document ID	9 2 99 CTDEP Letter
Author Org	State of Connecticut Department of Environmental Protection
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	2
Document Type	Letter
Phase Activity	REMEDIAL INVESTIGATION (RI)

Title Meeting Minutes of February 1, 2000 Meeting
Document Date 6-Mar-00
Author Org Tetra Tech NUS
Site Name Solvent Recovery Service of New England
Site ID CTD009717604
Document Type Memorandum
Phase Activity REMEDIAL INVESTIGATION (RI)

Title INTERIM MONITORING AND SAMPLING REPORT 3
Document Date 05-Jan-2000
Document ID 5647
Author Name GARY R CAMERON
Author Org BLASLAND BOUCK & LEE INC
Addressee Org US EPA REGION 1
Addressee Name BYRON MAH
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 28
Image \5647\00000001.tif 28
VolumID CD1
Document Type LETTER
Phase Activity REMEDIAL INVESTIGATION (RI)

Title LIST OF DATA VALIDATION REPORTS AVAILABLE FOR REVIEW THROUGH EPA NEW ENGLAND SUPERFUND RECORDS CENTER



-Records Not Included in the Administrative Record which were Relevant to the Decision Making Process

- Records Not Included in the Administrative Record which were not Directly Relevant to the Decision Making Process
- Record does not pertain to Site; Recommend Removal from the Administrative Record

* Documents included in the Group's comments on the Preliminary groundwater Use and Value Determination; Appendix B of the June 2000 FS and June 2004 FS Documents.

Attachment C
Table of Documents Produced During the RI/FS Process
Remedial Investigation Administrative Record Files

Document Date 03-May-2000
Document ID 6078
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 3
Image \6078\00000001.tif 3
VolumID CD1
Document Type LIST
Phase Activity REMEDIAL INVESTIGATION (RI)

Title Monthly Progress Reports
Document Date 1991- 2005.
Author Org BLASLAND BOUCK & LEE INC
Addressee Org USEPA
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages
Document Type REPORT
Phase Activity REMEDIAL INVESTIGATION (RI)



-Records Not Included in the Administrative Record which were Relevant to the Decision Making Process

- Records Not Included in the Administrative Record which were not Directly Relevant to the Decision Making Process
- Record does not pertain to Site; Recommend Removal from the Administrative Record

* Documents included in the Group's comments on the Preliminary groundwater Use and Value Determination; Appendix B of the June 2000 FS and June 2004 FS Documents.

Attachment C
Table of Documents Produced During the RI/FS Process
Feasibility Study Administrative Record Files

Title	First Draft Feasibility Study Report Volumes I, II, III
Document Date	November 1998
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Report
Phase Activity	FEASIBILITY STUDY (FS)

Title EPA Comments on Draft Feasibility Study Report
Document Date March 12 and 16, 1999, May 14, 1999
Author Org BLASLAND BOUCK & LEE INC
Addressee Org US EPA REGION 1
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Letter
Phase Activity **FEASIBILITY STUDY (FS)**

Title PROPOSAL AND RATIONAL REGARDING GROUNDWATER
BACKGROUND LOCATION, WITH ATTACHMENTS
Document Date 27-Jul-1999
Document ID 5622
Author Name GARY R CAMERON
Author Org BLASLAND BOUCK & LEE INC
Addressee Org CT DEPT OF ENVIRONMENTAL PROTECTION
Addressee Name MARTIN M BESKIND
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 38
Image \5622\00000001.tif 38
VolumelD CD1
Document Type LETTER
Phase Activity **FEASIBILITY STUDY (FS)**

Title REMEDY IMPLEMENTATION RISK EVALUATION
Document Date 01-Nov-1999
Document ID 6759
Author Org ENVIRON CORP
Addressee Org SRSNE SITE PRP GROUP
Access Type RELEASABLE
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Pages 431
Image \6759\00000001.tif 431
VolumelD CD1



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Attachment C
Table of Documents Produced During the RI/FS Process
Feasibility Study Administrative Record Files

Document Type REPORT
Phase Activity FEASIBILITY STUDY (FS)

Title Group "interim responses" to EPA FS Comments
Document Date July and November 1999, and January 2000.
Author Org BLASLAND BOUCK & LEE INC
Addressee Org US EPA REGION 1
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Letter
Phase Activity FEASIBILITY STUDY (FS)

Title	SRSNE - EPA Eliminates Soil Excavation From FS!
Document Date	2/28/2000
Author Org	de maximis, inc
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	email
Phase Activity	FEASIBILITY STUDY (FS)

Title	Transmittal of Notes on the February 1, 2000 Meeting SRSNE, Inc Site RI/FS Oversight RAC I W.A. No. 007RSD-00108
Document Date	3/6/2000
Author Org	United States Environmental Protection Agency, Region I
Addressee Org	SRSNE PRP Group
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	FEASIBILITY STUDY (FS)

Title EPA comments on February 25, 2000 (November responses) and draft comments (January 2000 responses).

Document Date March 8, 2000
Author Org US EPA REGION 1
Addressee Org BLASLAND BOUCK & LEE INC
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Letter
Phase Activity FEASIBILITY STUDY (FS)

Title	Second Draft Feasibility Study Report Volumes I, II, III
Document Date	June 6, 2000
Author Org	BLASLAND BOUCK & LEE INC



-Records Not Included in the Administrative Record which were Relevant to the Decision Making Process.

-Records Not Included in the Administrative Record which were not Directly Relevant to the Decision Making Process.

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Attachment C
Table of Documents Produced During the RI/FS Process
Feasibility Study Administrative Record Files

Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Report
Phase Activity	FEASIBILITY STUDY (FS)

Title	EPA comments on June 2000 FS -
Document Date	January 10, 2001
Author Name	
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	
Document Type	Letter
Phase Activity	FEASIBILITY STUDY (FS)

Title	SRSNE PRP Group Letter to USEPA Region 1, Mary Jane O'Donnell
Document Date	January 26, 2001
Author Name	Rob Kirsch
Author Org	SRSNE PRP Group
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	FEASIBILITY STUDY (FS)

Title	EPA Response to January 26, 2001 SRSNE PRP Group Letter
Document Date	2/26/01
Author Name	Mary Jane O'Donnell
Author Org	US EPA REGION 1
Addressee Org	SRSNE PRP Group
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	FEASIBILITY STUDY (FS)

Title	Focused Feasibility Study (FFS) Outline
Document Date	May 30, 2001
Author Org	Blasland, Bouck & Lee, Inc. (BBL)
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND



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-Records Not Included in the Administrative Record which were not Directly Relevant to the Decision Making Process.

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Attachment C
Table of Documents Produced During the RI/FS Process
Feasibility Study Administrative Record Files

Site ID CTD009717604
Pages
Document Type Letter
Phase Activity **FEASIBILITY STUDY (FS)**

Title EPA comments on June 2000 draft FS
Document Date June 20, 2001
Author Org US EPA REGION 1
Addressee Org Blasland, Bouck & Lee, Inc. (BBL)
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Letter
Phase Activity **FEASIBILITY STUDY (FS)**

Title	Response to June 2001 Preliminary EPA/CTDEP Comments on June 2000 Draft Feasibility Study
Document Date	November 2001
Author Org	SRSNE PRP Group
Addressee Org	United States Environmental Protection Agency, Region I
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	FEASIBILITY STUDY (FS)

Title	DISTINGUISHING OUTWASH, ABLATION TILL, AND BASAL TILL WITHIN THE SRSNE SITE POTENTIAL OVERBURDEN NAPL ZONE
Document Date	6/21/02
Document ID	SRS Till Memo
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	4
Document Type	Memorandum
Phase Activity	Feasibility Study

Title	SRSNE Site- Draft Feasibility Study - Remedial Response Actions, General Response Actions, Technology Types, and Process Options
Document Date	7/11/03
Document ID	SRSNE RAOs Draft Final
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	4



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Attachment C
 Table of Documents Produced During the RI/FS Process
 Feasibility Study Administrative Record Files

Document Type	Tables
Phase Activity	Feasibility Study

Title	SRSNE Site- Draft Feasibility Study - Identification and Screening of Remedial Technologies and the Process Options for Saturated Soil Containing NAPL
Document Date	8/12/03
Document ID	Solvent Recovery Service of New England PRP Group
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	3
Document Type	Tables
Phase Activity	Feasibility Study

Title	SRSNE Site- Draft Feasibility Study - Summary of Detailed Evaluation Criteria
Document Date	8/20/03
Document ID	FS Evaluation Criteria 8 20 03
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	8
Document Type	Tables
Phase Activity	Feasibility Study

Title	SRSNE Site- Initial Screening of Alternatives Risks Posed, Principle Threats, Remedial Action Objectives and Proposed Process Options
Document Date	8/20/03
Document ID	Table4-0RisksprinciplethreatsRAOsandprocessoptions82003
Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	4
Document Type	Tables
Phase Activity	Feasibility Study

Title	Revised Principle Threats and Remedial Action Objectives SRSNE Inc. Site
Document Date	11/13/03
Document ID	SRSNE RAOs Draft Final



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Attachment C
Table of Documents Produced During the RI/FS Process
Feasibility Study Administrative Record Files

Author Org	Solvent Recovery Service of New England PRP Group
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	3
Document Type	Tables
Phase Activity	Feasibility Study

Title EPA comments on FS Outline
Document Date July 27, 2001
Author Org US EPA REGION 1
Addressee Org Blasland, Bouck & Lee, Inc. (BBL)
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Letter
Phase Activity **FEASIBILITY STUDY (FS)**

Title Draft FS Work Plan Scoping Document
Document Date April 3, 2002
Author Org Blasland, Bouck & Lee, Inc. (BBL)
Addressee Org US EPA REGION 1
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Letter
Phase Activity **FEASIBILITY STUDY (FS)**

Title Draft Clarification Memorandum outline
Document Date September 10, 2002
Author Org Blasland, Bouck & Lee, Inc. (BBL)
Addressee Org US EPA REGION 1
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Memorandum
Phase Activity **FEASIBILITY STUDY (FS)**

Title EPA approval of Clarification Memorandum outline
Document Date September 30, 2002
Author Org US EPA REGION 1
Addressee Org Blasland, Bouck & Lee, Inc. (BBL)
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Letter
Phase Activity **FEASIBILITY STUDY (FS)**

Title Draft FS Screening Tables, RAOs, and Evaluation Criteria
Document Date June – September 2003
Author Org Blasland, Bouck & Lee, Inc. (BBL) and de maximis, inc



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Attachment C
Table of Documents Produced During the RI/FS Process
Feasibility Study Administrative Record Files

Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	FEASIBILITY STUDY (FS)
Title	PRELIMINARY REUSE ASSESSMENT
Document Date	01-Sep-2003
Document ID	222219
Author Org	US EPA REGION 1
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	35
Image	\\222219\00000001.tif 35
VolumID	CD1
Document Type	REPORT
Phase Activity	FEASIBILITY STUDY (FS)
Title	NAPL DELINEATION PILOT STUDY SCOPE
Document Date	24-Oct-2003
Document ID	229282
Author Name	MICHAEL GEFELL
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN M LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	23
Image	\\229282\00000001.tif 23
VolumID	CD1
Document Type	REPORT
Phase Activity	FEASIBILITY STUDY (FS)
Title	NAPL DELINEATION PILOT STUDY
Document Date	12-Dec-2003
Document ID	225370
Author Name	MICHAEL GEFELL
Author Org	BLASLAND BOUCK & LEE INC
Addressee Org	US EPA REGION 1
Addressee Name	KAREN M LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\225370\00000001.tif 1
VolumID	CD1



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Attachment C
 Table of Documents Produced During the RI/FS Process
 Feasibility Study Administrative Record Files

Document Type MEMO
Phase Activity FEASIBILITY STUDY (FS)

Title	Third Draft Feasibility Study Report Volumes I, II, and III
Document Date	June 25, 2004
Author Org	Blasland, Bouck & Lee, Inc. (BBL) and de maximis, inc
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Report
Phase Activity	FEASIBILITY STUDY (FS)

Title	Cost Experience Utilizing In Situ Thermal Processes to Address Chlorinated Solvent Volatile Organic Compound (CVOC) Contamination
Document Date	10/5/04
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	7
Document Type	Memorandum
Phase Activity	Feasibility Study

Title	Solvent Recovery Service of New England (SRSNE) Draft-Feasibility Study, Comments by Eva Davis
Document Date	10/7/04
Author Org	United States Environmental Protection Agency, Region I
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	12
Document Type	Memorandum
Phase Activity	Feasibility Study

Title	Electric Resistance Heating Technology Screening Report Solvent Recovery Service of New England
Document Date	11/4/04
Author Org	Thermal Remediation Services
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	18
Document Type	Report
Phase Activity	Feasibility Study



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-Records Not Included in the Administrative Record which were not Directly Relevant to the Decision Making Process.

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Attachment C
Table of Documents Produced During the RI/FS Process
Feasibility Study Administrative Record Files

Title	Assessment Report on the Viability of In-Situ Thermal Treatment, Solvent Recovery Service of New England
Document Date	11/22/04
Author Org	Tetra Tech NUS Inc.
Site Name	Solvent Recovery Service of New England
Site ID	CTD009717604
Pages	25
Document Type	Report
Phase Activity	Feasibility Study

Title EPA comments on Third Draft Feasibility Study Report
Document Date November and December 2004, and January 2005
Author Org US EPA REGION 1
Addressee Org Blasland, Bouck & Lee, Inc. (BBL) and de maximis, inc
Operable Unit SOURCE CONTROL
Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID CTD009717604
Document Type Report
Phase Activity FEASIBILITY STUDY (FS)

Title	Solvent Recovery Service of New England- Feasibility Study, Letter from SRSNE PRP Group Letter Expressing Concern About the Process of Finalizing the Feasibility Study and Selecting a Remedy for the Site.
Document Date	February 23, 2005
Author Name	Rob Kirsch
Author Org	SRSNE PRP Group
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	FEASIBILITY STUDY (FS)

Title	Letter Response to "Solvent Recovery Service of New England- Feasibility Study" Letter Dated February 23, 2005
Document Date	February 25, 2005
Author Name	
Author Org	US EPA REGION 1
Addressee Org	SRSNE PRP Group
Addressee Name	Rob Kirsch
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Document Type	Letter
Phase Activity	FEASIBILITY STUDY (FS)



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Attachment C
Table of Documents Produced During the RI/FS Process
Feasibility Study Administrative Record Files

Title	Letter Response to EPA's "Solvent Recovery Service of New England- Feasibility Study" Response Letter dated February 25, 2005
Document Date	March 7, 2005
Author Name	Rob Kirsch
Author Org	SRSNE PRP Group
Addressee Org	US EPA REGION 1
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	
Document Type	Report
Phase Activity	FEASIBILITY STUDY (FS)

Title Interim FS revisions – January 2005 PRG, Risk and Cost Tables, February – April 2005 agency submissions

Document Date April 2005

Author Org Blasland, Bouck & Lee, Inc. (BBL) and de maximis, inc

Addressee Org US EPA REGION 1

Operable Unit SOURCE CONTROL

Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND

Site ID CTD009717604

Document Type Report

Phase Activity **FEASIBILITY STUDY (FS)**

Title DRAFT FEASIBILITY STUDY (FS) REPORT

Document Date 01-May-2005

Document ID 222220

Access Type RELEASABLE

Operable Unit SOURCE CONTROL

Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND

Site ID CTD009717604

Pages 1

Image \222220\00000001.tif 1

VolumID CD1

Document Type REPORT

Phase Activity **FEASIBILITY STUDY (FS)**

Title GROUNDWATER USE AND VALUE DETERMINATION

Document Date 12-May-2005

Document ID 222217

Author Org CT DEPT OF ENVIRONMENTAL PROTECTION

Access Type RELEASABLE

Operable Unit SOURCE CONTROL

Site Name SOLVENTS RECOVERY SERVICE OF NEW ENGLAND

Site ID CTD009717604

Pages 19

Image \222217\00000001.tif 19

VolumID CD1



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Attachment C
 Table of Documents Produced During the RI/FS Process
 Feasibility Study Administrative Record Files

Document Type	REPORT
Phase Activity	FEASIBILITY STUDY (FS)
Title	CT DEP REQUEST FOR CLARIFICATION OF EPA'S RECENT APPLICABLE OF RELEVANT AND APPROPRIATE REQUIREMENTS (ARAR) INTERPRETATION
Document Date	24-May-2005
Document ID	229305
Author Name	CHRIS LACAS
Author Org	CT DEPT OF ENVIRONMENTAL PROTECTION
Addressee Org	US EPA REGION 1
Addressee Name	KAREN M LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\229305\00000001.tif 1
VolumelD	CD1
Document Type	MEMO
Phase Activity	FEASIBILITY STUDY (FS)
Title	EPA'S POSITION REGARDING THE CONNECTICUT REMEDIATION STANDARD REGULATIONS (RSRS) AS APPLICABLE OF RELEVANT AND APPROPRIATE REQUIREMENTS (ARARS)
Document Date	01-Jun-2005
Document ID	229306
Author Name	GRETCHEN MUENCH
Author Org	US EPA REGION 1
Addressee Org	US EPA REGION 1
Addressee Name	KAREN M LUMINO
Access Type	RELEASABLE
Operable Unit	SOURCE CONTROL
Site Name	SOLVENTS RECOVERY SERVICE OF NEW ENGLAND
Site ID	CTD009717604
Pages	1
Image	\\229306\00000001.tif 1
VolumelD	CD1
Document Type	MEMO
Phase Activity	FEASIBILITY STUDY (FS)



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