



STATE OF CONNECTICUT  
DEPARTMENT OF ENVIRONMENTAL PROTECTION



CONDITIONAL APPROVAL

December 11, 2006

Mr. David Silverstone  
Chief Executive Officer  
Regional Water Authority  
90 Sargent Drive  
New Haven, Connecticut 06511-5966

Re: Conditional Approval of the Proposed Offsite Supplemental Investigations  
Former Hamden Middle School  
Hamden, Connecticut  
Consent Order No. SRD-128

Dear Mr. Silverstone:

The State of Connecticut Department of Environmental Protection (the Department) has received and reviewed the report titled, *Second Bi-monthly Sample Results and Proposed Offsite Supplemental Investigations* (the Proposal), dated November 15, 2006, submitted by Leggette, Brashears, & Graham, Inc. (LBG), on behalf of the South Central Connecticut Regional Water Authority (RWA).

The former Hamden Middle School site is an area of investigation currently consisting of the former Hamden Middle School and a portion of the Newhall Community Center (also known as Newhall Street School) and two residential properties (249-251 and 253-255 Morse Street). The Site is being evaluated under Consent Order No. SRD-128, dated April 16, 2003, executed by Town of Hamden, RWA, Olin Corporation, State Board of Education and the Department.

The Proposal presents a scope of work to further characterize the extent of the halogenated volatile organic compound (VOC) plume migrating from the southwest portion of the former Hamden Middle School site. LBG proposes to complete a screening level groundwater investigation at 20 locations and analyze the groundwater samples for halogenated VOCs by EPA Method 8260.

The Department has reviewed the Proposal, and based on that review and discussions with RWA and LBG, has the following findings and conditions of approval:

1. Based on the existing groundwater data the locations proposed by LBG appear to be adequate to aid in further characterization of the VOC plume. The Department recognizes that some minor field adjustments to the proposed locations may be necessary based the presence of either overhead or underground utilities. Minor changes to the boring locations made in the field to avoid utilities do not require prior Department approval. However, if significant alterations to the proposed boring locations are necessary, Department approval of the new locations is required prior to commencement of work.

2. LBG proposes to analyze the groundwater samples for halogenated VOCs by EPA Method 8260. Where technically feasible the limits of detection must be less than the lowest applicable Regulations of the Connecticut State Agencies, Remediation Standard Regulations (RSRs).
3. As indicated in the Proposal, the groundwater sample results will be provided to the Department immediately after receipt of the data from the laboratory.
4. At this time, the Department does not approve LBG's request to suspend soil vapor monitoring at 315-317, 319-321, and 330 Morse Street. Soil vapor monitoring at these parcels must continue in accordance with the Department's Conditional Approval letter dated August 17, 2006. However, the Department will re-evaluate this request as additional data is generated regarding the characterization of the plume.
5. Future submittals shall include a discussion of the laboratory results and identify any exceedances of RSR criteria. Furthermore, if warranted, the submittal must include a proposed scope of work for any additional investigation deemed necessary by RWA and LBG to further define the extent and degree of pollution and for any interim remedial actions necessary to protect human health.
6. RWA or LBG shall notify the Department at least three (3) business days before the anticipated commencement of work.
7. Please note that the Proposed Residential Soil Vapor Volatilization Criterion for total xylenes is incorrectly stated on Table 1. The correct criterion is 38,000 parts per billion by volume (ppbv). An explanation of the acronym "NA" used in Table 1 was not provided. These discrepancies in Table 1 should be clarified and corrected for future submittals.

If at any time the Commissioner determines that the actions at the site have not fully characterized the extent and degree of pollution or have not successfully abated or prevented pollution, the Commissioner may institute any proceeding, or take any action to require further investigation or further action to prevent or abate pollution. If you have any questions regarding this matter, please contact Eileen M. Barnes of my staff at (860) 424-3090.

Sincerely,



Patrick F. Bowe

Director

Remediation Division

Bureau of Water Protection and Land Reuse

PFB:emb

G:Hamden/Hamden Middle School/Letter DEP Determinations on LBG's Proposal November 2006

cc: Thomas Chaplik, RWA  
Michael Manolakas, LBG  
Jeff Lennox, LBG  
Raymond Horn, Olin Corporation  
Nelson Walter, MACTEC  
Chris Harriman, Haley & Aldrich, Inc.  
Honorable Mayor Craig Henrici, Town of Hamden  
Brian Cutler, Loureiro Engineering Associates, Inc.

Meg Harvey, DPH  
Leslie Balch, QVHD  
Robert Bell, DEP  
Rep. Peter Villano, Newhall Advisory Committee  
Public Information Repositories