



STATE OF CONNECTICUT
DEPARTMENT OF ENVIRONMENTAL PROTECTION



CONDITIONAL APPROVAL

October 14, 2004

Mayor Carl Amento
Hamden Government Center
2750 Dixwell Avenue
Hamden, CT 06518

RE: Supplemental Phase III Environmental Investigation Work Plan
Rochford Field and Mill Rock Park
Hamden, Connecticut
Consent Order No. SRD-128

Dear Mayor Amento:

The Remediation Section of the Department of Environmental Protection has reviewed the Work Plan titled, "Supplemental Phase III Environmental Investigation Work Plan, Rochford Field and Mill Rock Park, Hamden, Connecticut," dated July 2004, prepared for the Town of Hamden ("Town") by Haley & Aldrich, Inc. and received on July 13, 2004 ("Work Plan"). The Work Plan was submitted pursuant to paragraph B.3.b of Consent Order No. SRD-128, issued on April 16, 2003.

The Work Plan proposes supplemental soil and ground water investigations to be completed at the Rochford Field and Mill Rock Park portions of the Newhall Street Neighborhood site in Hamden.

The Work Plan is hereby approved with the following conditions:

1. Contaminants of Concern. Polychlorinated dibenzodioxins and polychlorinated dibenzofurans must be analyzed in any soil or fill sample for which chlorinated solvents or polychlorinated biphenyls (PCBs) are detected, and in select soil or fill samples exhibiting the relatively highest concentrations of polynuclear aromatic hydrocarbon compounds, as determined by the Department. Volatile organic compounds (VOCs) must be maintained as contaminants of concern at Mill Rock Park and the sewer pump station. All contaminants of concern, including pesticides, must be analyzed in groundwater samples collected from all new and existing groundwater monitoring wells.
2. Geophysical Survey. The grid spacing proposed for the ground penetrating radar (GPR) and magnetometer survey is insufficient to identify the presence of metal drums and must be reduced to be appropriate for the identification of objects of this size.

3. Test Pits. Laboratory certification must be provided for any clean backfill brought from off-site that will be used to return the excavations to grade. Any surplus excavated materials that are not returned to test pit excavations must be properly containerized and stored at a secure location, pending the results of waste characterization for off-site disposal.
4. Subsurface Investigation Program. Any soil or fill sample analyzed for total metals must also be analyzed for leachable metals using the synthetic precipitation leaching procedure (SPLP). All samples of native soil underlying fill materials must be analyzed for contaminants of concern attributable to the fill to assess potential impacts to the underlying native soils.
5. Surface Soil Sampling. Collection of four additional shallow surface soil samples is required at the playground area at Mill Rock Park. Soil samples must be analyzed for all contaminants of concern attributable to the fill.
6. Groundwater Investigation. One deep groundwater monitoring well must be installed near existing shallow monitoring well RF-HA108-MW to assess potential impacts to deep groundwater and to assess vertical flow gradients.
7. Quality Assurance Project Plan. Table I of the Quality Assurance Project Plan must be revised to reflect additional contaminants of concern identified in the text of the Work Plan. The frequency of field duplicate sample collection must be at least one duplicate sample per every 20 samples analyzed or one duplicate sample per day, whichever is more frequent.
8. Schedule. A detailed schedule that graphically identifies the anticipated timing of all proposed field activities from mobilization through demobilization must be submitted. The schedule must also include the dates of all required reports submitted under this approved Work Plan. An interim report that includes the results of geophysical and subsurface investigations must be submitted by January 31, 2005. The schedule must include submittal of a final investigation report and evaluation of remedial alternatives by April 30, 2005.

Nothing in this approval shall affect the Commissioner's Authority to institute any proceeding, or take any other action to prevent or abate pollution, to recover costs and natural resource damages, and to impose penalties for violations of law including but not limited to violations of any permit issued by the Commissioner. If at any time the Commissioner determines that the approved actions have not fully characterized the extent and degree of pollution, the Commissioner may institute any proceeding, or take any action to require further investigation. This approval relates only to pollution or contamination identified in the above referenced Work Plan.

In addition, nothing in this determination shall relieve any person of his or her obligations under applicable federal, state and local law.

If you have any questions pertaining to this matter, please contact Shannon W. Pociu of my staff at (860) 424-3546.

Sincerely,



Elsie Patton
Acting Director
Planning & Standards Division
Bureau of Waste Management

EP:SWP

cc: Ann M. Catino, Halloran & Sage LLP
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