STATE OF CONNECTICUT DEPARTMENT OF ENVIRONMENTAL PROTECTION



February 24, 1987

Mr. Steven Smith Metcalf & Eddy P.O. Box 4043 Woburn, MA 01888-4043

Dear Mr. Smith:

This letter is to follow-up our telephone conversation of last Wednesday. I wish to reiterate the following comments on the Draft AVCO Lycoming Textron Groundwater Monitoring Assessment Plan:

- 1. The plan should be reviewed for basic consistency with the EPA Technical Enforcement Guidance Document.
- 2. The plan should be reviewed for completeness and appropriateness of regulatory references, specifically:
 - o p. 51: soil contaminated above background levels is contaminated.
 o p. 62: Connecticut requires 30 years of post closure monitoring.
 o ensure compliance with state groundwater monitoring reporting regulatory requirements.
- 3. Please provide a location map for the 1982 Haley and Aldrich borings.
- 4. Although replicate indicator parameter samples are not required during assessment monitoring, you should continue replicate sampling if you anticipate a return to detection monitoring.
- 5. The discussion of horizontal gradients (p. 24) should be reviewed for clarity, appropriateness, and technical correctness.
- Although the tidal inlet is identified as a discharge point, later discussion of assessment program design does not fully reflect this flow pattern.
- Please provide a map and cross sections showing the chrome plume, if possible.
- 8. Please identify any trends in site-specific monitoring parameters which are present in existing monitoring data, if possible.

Phone

9. Spatial distribution of deep and shallow wells results in a data gap for shallow parts of the aquifer in the central part of the study area. Please include a proposal to specifically address this data gap.

If you have any further questions or if I can be of further assistance, please call me at 566-1848.

Sincerely,

Kenneth Feathers Sanitary Engineer

Hazardous Waste Management Section

KF/vh

cc: John Fleming, AVCO Lycoming